Recording in progress

AB 2143 Webinar: Most Frequently Asked Contractor Questions

Wednesday, October 14th, 2026 | 11:00 AM

Microsoft Teams Webinar

California Public Utilities Commission

SURGE
Solar-Utilities Reporting Guidance & Education

The Solar-Utilities Reporting, Guidance, and Education (SURGE) is an initiative directed by the California Public Utilities Commission.

Presentation Disclaimer

- The following presentation has been provided for informational purposes and may be subject to change based on legislation or regulatory requirements.
- Please refer to official sources from the CPUC or contact SURGE for the most up-to-date information.

Webinar Ground Rules

Webinar is being recorded and will be available for review.

A copy of the presentation slides will be available after the webinar.

Microphones & cameras will be disabled for participants.

Be respectful to all presenters and participants.

Use Q&A feature for submitting your questions.

The webinar will be delivered in a Q&A format based on contractor FAQs.

Today's Agenda

- **Introductions**
- **AB 2143 Updates**
- **Most Frequently Asked Contractor Questions**
  - General
  - Compliance
  - SURGE Compliance Portal
- **SURGE Reminders**
- **Wrap Up and Q&A**

Introductions

California Public Utilities Commission (CPUC)

- **Amber Murakami-Fester**, Program Manager/Regulatory Analyst

SURGE Team (GCAP Services, Inc.)

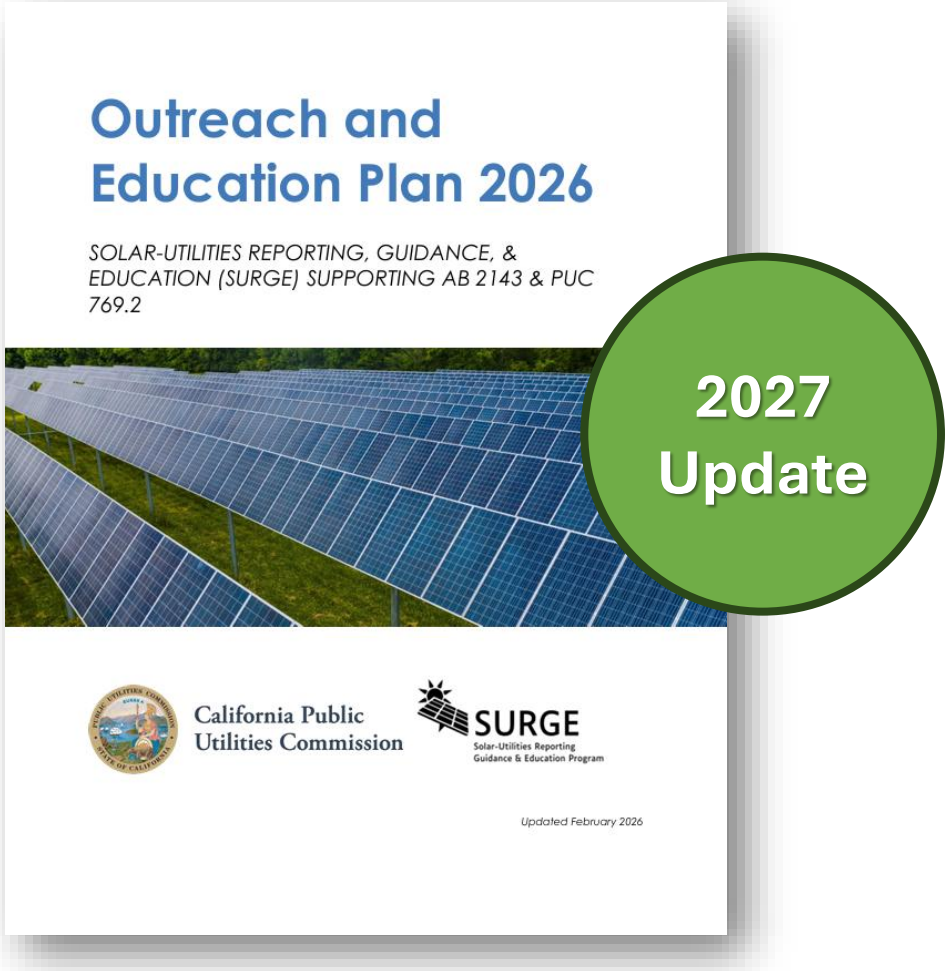
- **Sylvia Linn**, SURGE Project Manager
- **Ariana Fernandez**, Senior Prevailing Wage Consultant
- **Christina Salcedo**, Senior Compliance Consultant
- **Brittany Yamagata**, Senior Outreach & Education Consultant
- **Grace Turney**, Project Coordinator
- **Vanessa Marquez**, Project Coordinator

AB 2143 Updates

What's New?

Outreach & Education Plan 2027 Update

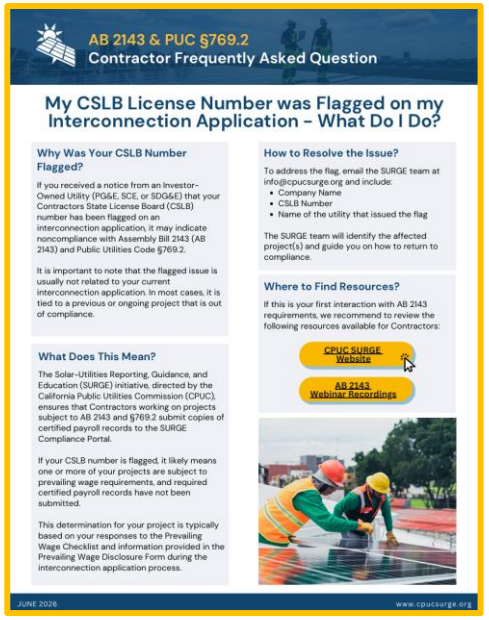
- SURGE is working on updating the Outreach and Education (O&E) Plan for 2027.
- Report 2026 progress and plan for 2027 activities.
- Draft 2027 plan will be available end of October.
- Take the following survey for a chance to win a $25 gift card: AB 2143 Survey

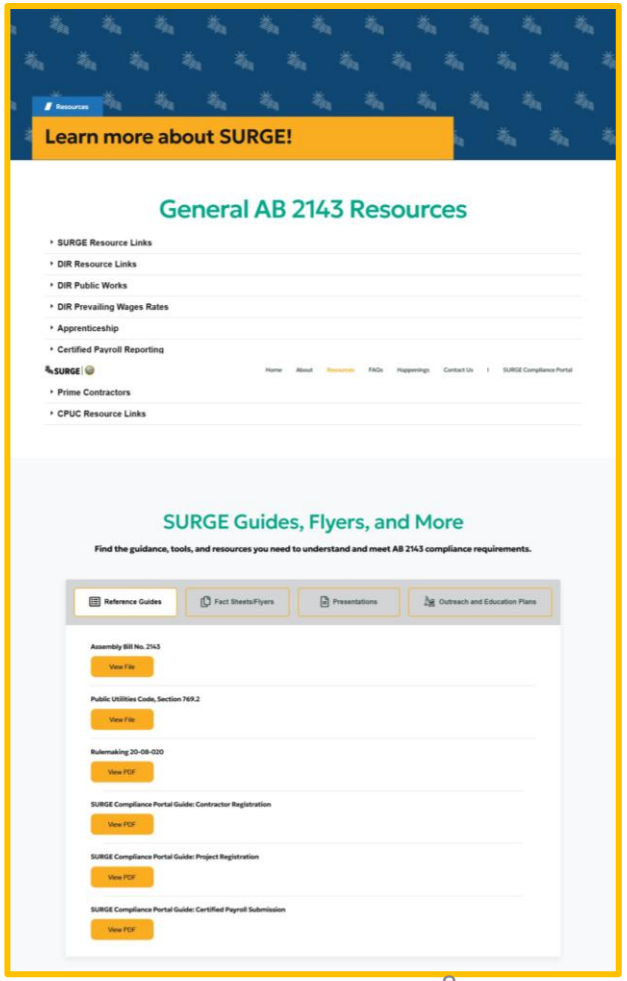


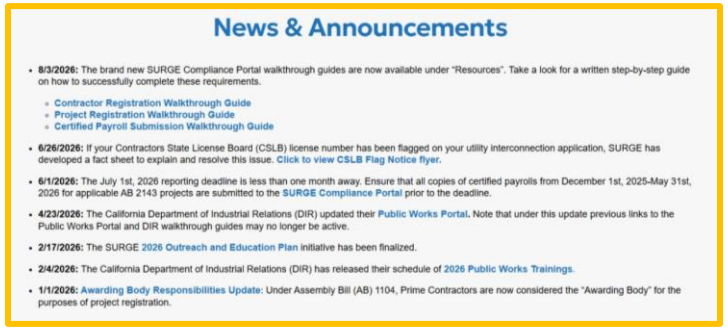
SURGE Website & Resources Enhancements

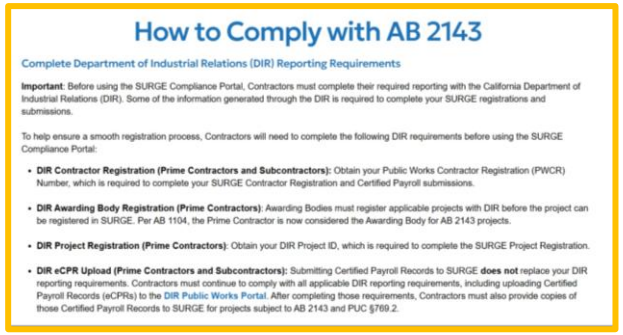
SURGE website and resource updates include:

- New flyers
- New written content
- New layout updates
- Addition of “News and Announcement” section

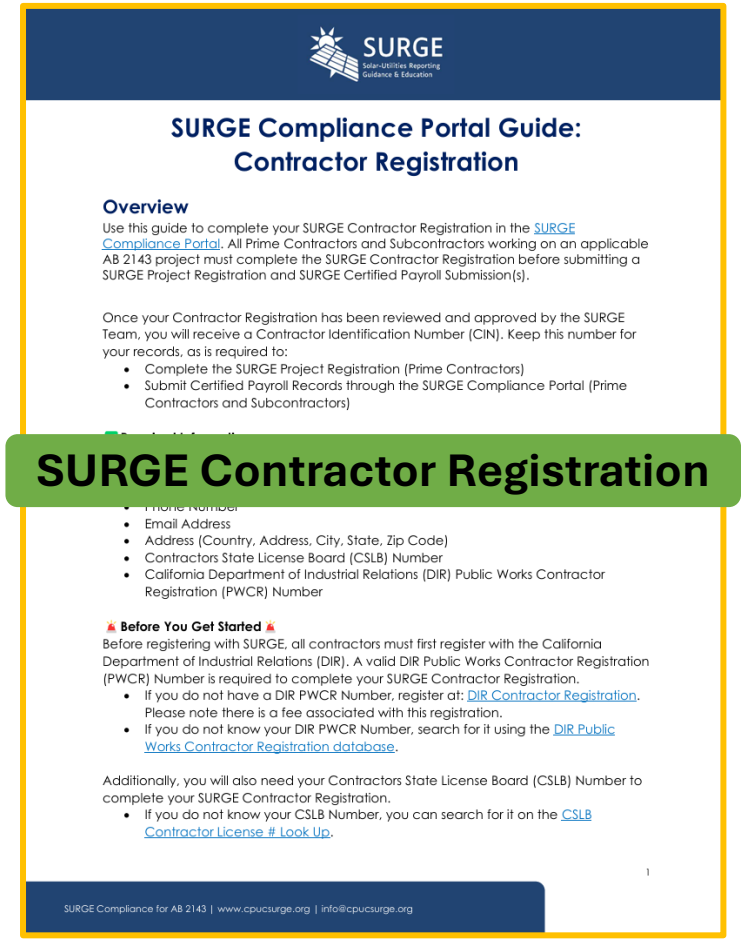








SURGE Compliance Portal Walkthrough Guides



SURGE Solar-Utilities Reporting Guidance & Education

SURGE Compliance Portal Guide: Contractor Registration

Overview

Use this guide to complete your SURGE Contractor Registration in the SURGE Compliance Portal. All Prime Contractors and Subcontractors working on an applicable AB 2143 project must complete the SURGE Contractor Registration before submitting a SURGE Project Registration and SURGE Certified Payroll Submission(s).

Once your Contractor Registration has been reviewed and approved by the SURGE Team, you will receive a Contractor Identification Number (CIN). Keep this number for your records, as is required to:

- Complete the SURGE Project Registration (Prime Contractors)
- Submit Certified Payroll Records through the SURGE Compliance Portal (Prime Contractors and Subcontractors)

- Email Address
- Address (Country, Address, City, State, Zip Code)
- Contractors State License Board (CSLB) Number
- California Department of Industrial Relations (DIR) Public Works Contractor Registration (PWCR) Number

🚨 **Before You Get Started** 🚨

Before registering with SURGE, all contractors must first register with the California Department of Industrial Relations (DIR). A valid DIR Public Works Contractor Registration (PWCR) Number is required to complete your SURGE Contractor Registration.

- If you do not have a DIR PWCR Number, register at: DIR Contractor Registration. Please note there is a fee associated with this registration.
- If you do not know your DIR PWCR Number, search for it using the DIR Public Works Contractor Registration database.

Additionally, you will also need your Contractors State License Board (CSLB) Number to complete your SURGE Contractor Registration.

- If you do not know your CSLB Number, you can search for it on the CSLB Contractor License # Look Up.

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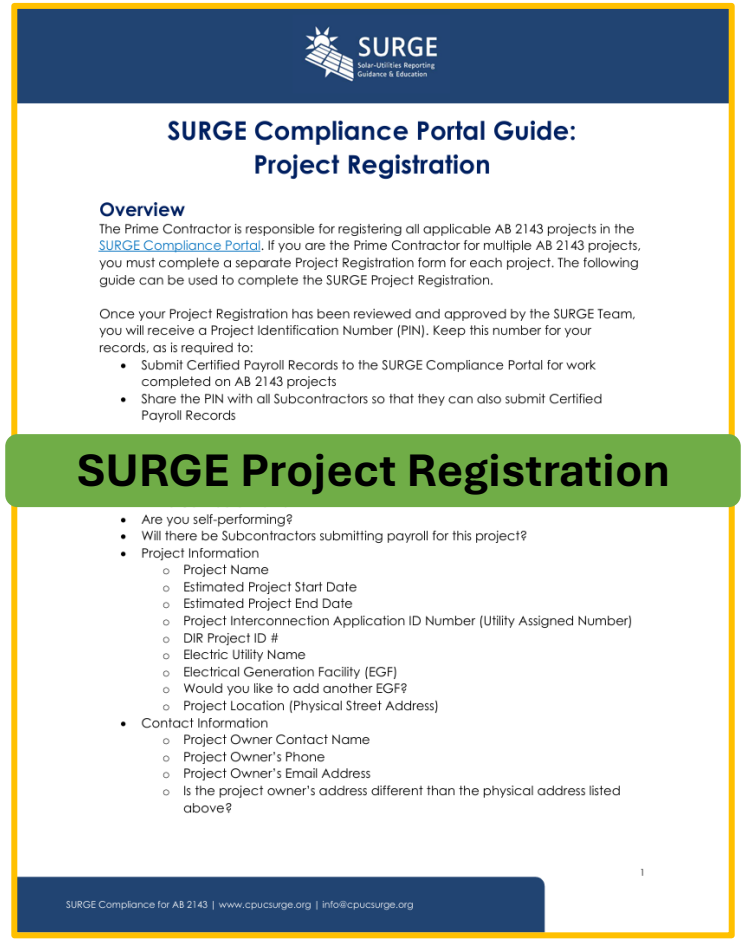
SURGE Compliance for AB 2143 | www.cpucsurge.org | info@cpucsurge.org

SURGE Contractor Registration



SURGE Solar-Utilities Reporting Guidance & Education

SURGE Compliance Portal Guide: Project Registration

Overview

The Prime Contractor is responsible for registering all applicable AB 2143 projects in the SURGE Compliance Portal. If you are the Prime Contractor for multiple AB 2143 projects, you must complete a separate Project Registration form for each project. The following guide can be used to complete the SURGE Project Registration.

Once your Project Registration has been reviewed and approved by the SURGE Team, you will receive a Project Identification Number (PIN). Keep this number for your records, as is required to:

- Submit Certified Payroll Records to the SURGE Compliance Portal for work completed on AB 2143 projects
- Share the PIN with all Subcontractors so that they can also submit Certified Payroll Records

- Are you self-performing?
- Will there be Subcontractors submitting payroll for this project?
- Project Information
  - Project Name
  - Estimated Project Start Date
  - Estimated Project End Date
  - Project Interconnection Application ID Number (Utility Assigned Number)
  - DIR Project ID #
  - Electric Utility Name
  - Electrical Generation Facility (EGF)
  - Would you like to add another EGF?
  - Project Location (Physical Street Address)
- Contact Information
  - Project Owner Contact Name
  - Project Owner's Phone
  - Project Owner's Email Address
  - Is the project owner's address different than the physical address listed above?

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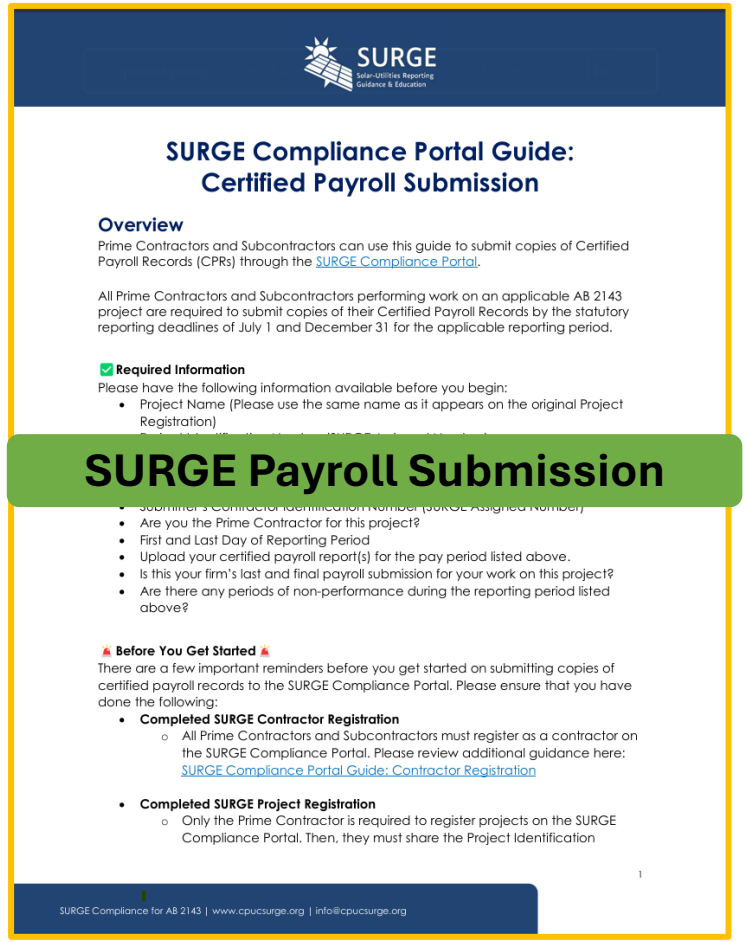
SURGE Project Registration



SURGE Solar-Utilities Reporting Guidance & Education

SURGE Compliance Portal Guide: Certified Payroll Submission

Overview

Prime Contractors and Subcontractors can use this guide to submit copies of Certified Payroll Records (CPRs) through the SURGE Compliance Portal.

All Prime Contractors and Subcontractors performing work on an applicable AB 2143 project are required to submit copies of their Certified Payroll Records by the statutory reporting deadlines of July 1 and December 31 for the applicable reporting period.

✅ **Required Information**

Please have the following information available before you begin:

- Project Name (Please use the same name as it appears on the original Project Registration)

- Are you the Prime Contractor for this project?
- First and Last Day of Reporting Period
- Upload your certified payroll report(s) for the pay period listed above.
- Is this your firm's last and final payroll submission for your work on this project?
- Are there any periods of non-performance during the reporting period listed above?

🚨 **Before You Get Started** 🚨

There are a few important reminders before you get started on submitting copies of certified payroll records to the SURGE Compliance Portal. Please ensure that you have done the following:

- **Completed SURGE Contractor Registration**
  - All Prime Contractors and Subcontractors must register as a contractor on the SURGE Compliance Portal. Please review additional guidance here: SURGE Compliance Portal Guide: Contractor Registration

- **Completed SURGE Project Registration**
  - Only the Prime Contractor is required to register projects on the SURGE Compliance Portal. Then, they must share the Project Identification

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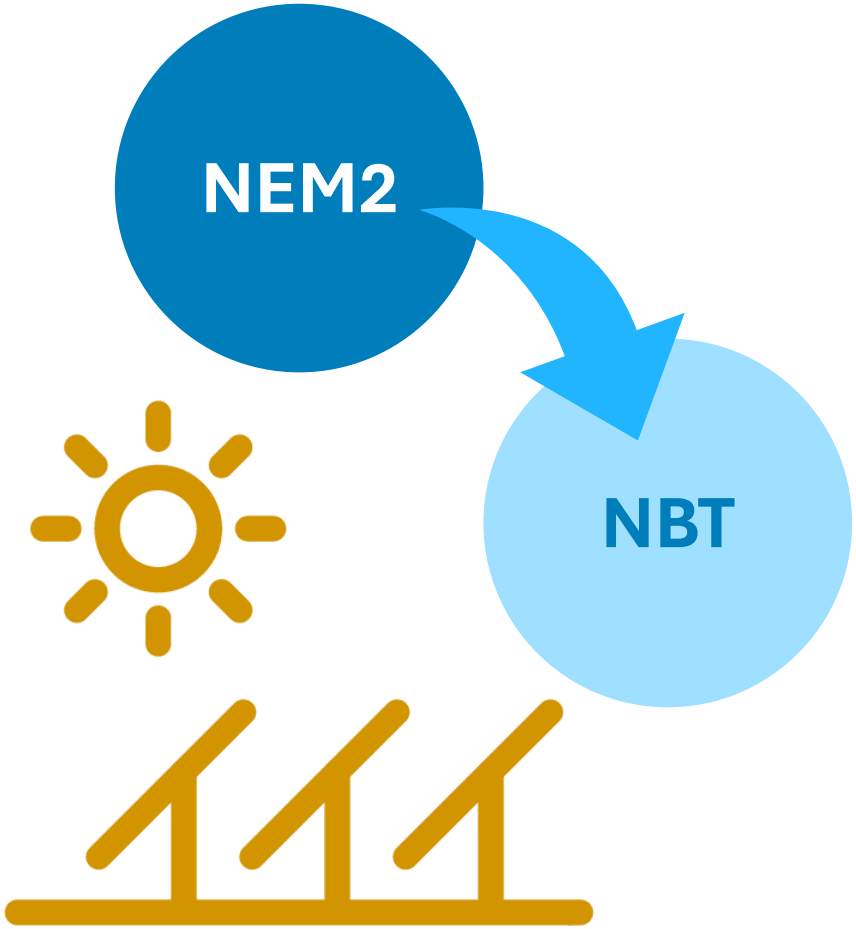
SURGE Payroll Submission

Projects Transitioning from NEM2 to NBT

- The IOUs have provided guidance on projects transitioning from NEM2 to NBT tariffs.
- Please note that AB 2143 prevailing wage requirements will not apply to projects making this transition.
- Projects where contractors applied for NEM2 before April 15, 2023, **AND**
  - Did not submit final building permit sign-off for their projects on or before April 14, 2026, **AND**
  - Do not have an approved utility-related extension.
- Send an email to the SURGE Team at info@cpucsurge.org for assistance with:
  - Determining whether AB 2143 and PUC 769.2 requirements apply to your specific situation, and how to remain compliant.
  - Resolving any issues if your NEM2 project has been flagged by the IOU/SURGE after transitioning to NBT.



General Questions

What is AB 2143 and PUC §769.2?

Purpose

- Ensure construction workers and apprentices involved in qualified customer-sited renewable electrical generation (largely solar and solar with storage) facilities are paid prevailing wages.

Effective Date

- January 1, 2024

Renewable Energy Facility Qualifications

- Renewable energy generation facility, and any associated battery storage, that seeks to use the contract or tariffs pursuant to PUC 2827.1 will constitute as **PUBLIC WORKS** (PUC §769.2(a)).
- The PUC 2827.1 tariffs include the net energy metering and net billing tariffs.

Ensures that Contractors are paying workers prevailing wages on qualified solar projects.

Who does AB 2143 apply to?

All Prime Contractors and Subcontractors (all tiers) working on eligible renewable energy projects must meet AB 2143 and PUC §769.2 requirements.

What do Contractors need to do?

Pay construction workers & apprentices prevailing wages (PUC 769.2(b)(1)).

Maintain and verify certified payroll records through the California Department of Industrial Relations (PUC 769.2(b)(2)).

Submit digital copies of certified payroll records to the Commission twice a year on July 1 and December 31 of each year (PUC 769.2(b)(3)).

What projects are subject to AB 2143?

The following projects are subject to AB 2143 requirements unless they fall under a current eligibility exception:

- ✓ All commercial projects
- ✓ Some residential projects over 15 kilowatts (more information on slide 26)

Project Eligibility Exceptions PUC §769.2(f)(1-4):

- Is the project a residential facility with a **maximum** generating capacity of **15 kilowatts** or **less** or installed on a single-family home?
- Is the projects already classified as a public work under existing law?
- Do the facilities serve only a modular home, a modular home community, or multiunit housing with 2 or fewer stories?

If you answer "yes" to any of these questions, the project may not be subject to AB 2143.

Compliance Questions

Do Contractors need to comply with DIR and SURGE?

- Yes, Contractors need to comply with both DIR and SURGE.
- Per PUC §769.2, contractors are required to submit digital copies of its certified payroll records to the CPUC [via SURGE Compliance Portal] biannually on July 1st and December 31st of each year.
- Per Labor Code Section 1771.4 (3) (A) (i) (ii), contractors must furnish the records specified in Section 1776 directly to the Labor Commissioner [via DIR] at least monthly, or more frequently if specified in the contract with the awarding body.

How do I comply with AB 2143?

Complete DIR Requirements

- Awarding Body Registration (Prime)
- Project Registration (Prime)
- Public Works Contractor Registration (Primes & Subs)

Complete SURGE Requirements

- AB 2143 Contractor Registration (Primes & Subs)
- AB 2143 Project Registration (Primes)

Work on the Project (Primes & Subs)

Report Certified Payroll Records (CPRs)

- Report CPRs to DIR (Primes & Subs)
- Report Copies of CPRs to SURGE (Primes & Subs)

Do I need a DIR Project ID # to register my project on SURGE even if it is not a public works project?

- Yes. Prime Contractors must have a DIR Project ID # to register projects on the SURGE Compliance Portal.
- AB 2143 applies to privately funded commercial solar projects and designates them as "public works", making them subject to the same requirements as construction projects funded by state and/or federal funding.
- Per AB 1104, Prime Contractors are now the Awarding Body for AB 2143 projects and are responsible for registering the project and obtaining the DIR Project ID.

Can you explain AB 1104 and the new Awarding Body information?

- AB 1104 became effective on January 1, 2026, and amends PUC 769.2 and impacts AB 2143 projects.
- Under AB 1104:
  - ✓ The Prime Contractor is now considered the "Awarding Body" for AB 2143 project registration.
  - ✓ The Prime must register as an Awarding Body for AB 2143 and then register the project with DIR.
  - ✓ Prime Contractors are now responsible for DIR Project Registration which was previously completed by the project owner.

Where do I submit payrolls for AB 2143?

- ✓ Submit digital copies of payroll records to the SURGE Compliance Portal to meet AB 2143 requirements.
- ✓ Before submitting, all Contractors must complete the Contractor Registration, and the Prime must complete the Project Registration.

Urgent! My CSLB got flagged, what do I do?

- Contractors might experience trying to register a project with an IOU for interconnection and receiving a hold.
- May indicate noncompliance with AB 2143 and PUC 769.2 on a previous or ongoing project.
- Noncompliance means that copies of certified payroll records have not been submitted to SURGE.
- To resolve, send an email to info@cpucsurge.org and include:
  - ✓ Company Name
  - ✓ CSLB Number
  - ✓ Name of the utility that issued the flag
- SURGE will identify affected projects and guide you on how to return to compliance.

What projects are exempt?

Here are some Project Examples that may qualify for review and possible exemption from AB 2143 requirements.

Project started in 2023 (or earlier) and completed or ongoing in 2024, with an Interconnection Application submitted and approved on or before December 31, 2023.

Project completed in 2023 (or earlier), with an Interconnection Application filed with an IOU in 2023, but still pending approval on or after January 1, 2024.

Project completed in 2023 (or earlier), but Interconnection Application filed with an IOU on or after January 1, 2024.

Project contract executed and work started in 2023, but extended into 2024, with the Interconnection Application subsequently submitted in 2024.

Project is on Tribal Land. Location must be verified.

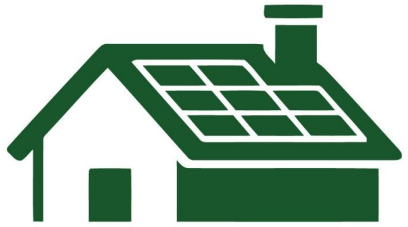
Project is with a municipal utility or a small multi-jurisdictional utility like Liberty Utilities, Bear Valley Electric Service, or PacifiCorp.

How do I request an exemption?

- Contractors must send an email to info@cpucsurge.org requesting a possible project exemption and must provide verifiable evidence.
- The SURGE Team will review the request and determine if the exemption is accepted or denied.
- Examples of **verifiable evidence** may include:
  - ✓ Final approved inspection record/building permit (or equivalent)
  - ✓ Affidavit attesting contract execution and project start date in 2023, accompanied by:
    - A copy of the executed contract (personal information may be redacted)
    - Any other documentation identifying the project details and start date

My project is under 15kW. Does that mean I'm exempt?

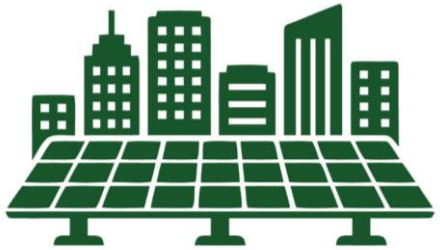
- Only residential projects under 15kW may be exempted from AB 2143 requirements.
- If you are working on a commercial project that is under 15kW, it is subject to AB 2143 reporting requirements.
- Commercial projects, no matter the size of the generating capacity, are subject to AB 2143.



Residential Projects

Under 15kW **x Not Applicable**

Over 15kW ✓ **Applicable**

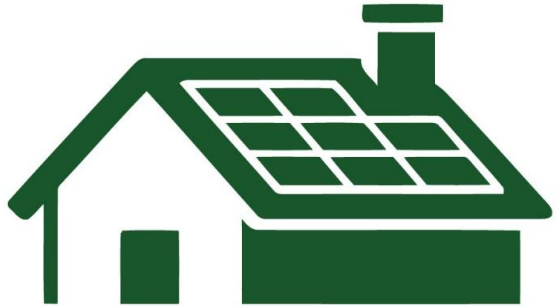


Commercial Projects

✓ **All projects are applicable regardless of size.**

Are there any exemptions for residential projects over 15kW?

- Yes, there are some instances where exemptions may apply for residential projects over 15kW:
  - All single-family homes
  - Projects servicing modular homes/modular home communities
  - Multiunit housing that has two or fewer stories



How do I know what prevailing wages to pay?

- For AB 2143 projects, the SURGE team reviews submitted certified payroll records to ensure all required information is included. However, SURGE does not determine or advise on the appropriate wage rates.
- Contractors are responsible for identifying the correct prevailing wages, including applicable classifications and rates.
- Refer to the California Department of Industrial Relations (DIR) for official prevailing wage determinations, classifications, and requirements. Please visit www.dir.ca.gov/Public-Works to get started.
- Contractors may use consultant services to assist them through this prevailing wage process if needed.

What are Certified Payroll Records (CPRs)?

- CPRs are reports that Contractors must submit on certain public works projects to ensure they are paying workers correctly under prevailing wage laws.
- Per Labor Code §1776, CPRs must include:
  - Employee Name, Address, and SSN
  - Work Classification
  - Daily & Weekly Straight-Time and Overtime Hours
  - Hourly Rate and Actual Wages Paid
- "Certified" means that the payroll record is accompanied by a signed Statement of Compliance which is required by Labor Code §1776(b).
- For more information, you can reference the Public Works Manual Section 3.1.1. (Link)

Can a project that receives state and/or federal funding still be subject to AB 2143 prevailing wage requirements?

- Projects receiving state and/or federal funding are already subject to public works requirements under existing law (e.g., Labor Code Section 1720-1815) and are exempt from AB 2143 SURGE requirements.
- Contractors must still comply with applicable DIR/DOL public works requirements, including paying prevailing wages and certified payroll reporting.

Does the presence of a solar component on a project subject all contractors working on the project to AB 2143 prevailing wage requirements, or only the contractors performing solar-related work?

- This situation requires a **coverage determination** to find out which part of the project is subject to AB 2143.
- SURGE is not authorized to provide any coverage determinations.
- Contractors must direct questions to the DIR at pwcoverage@dir.ca.gov.
  - Note: Add “AB 2143” in the subject line and the body of your email so that DIR can provide the correct guidance.
- Include the following in your email:
  - Specific question regarding coverage determination and description of the scenario
  - Bid advertisement date or contract execution date
  - Location of the project (county)
  - Detailed description of the scope of work

When does the prevailing wage obligation end for a project? For example, if a project is complete, are prevailing wage requirements still applicable if a contractor must return to replace a faulty component?

- Prevailing wage requirements apply to all covered on-site labor, including warranty work and repairs.
- If a contractor returns to the project to replace a faulty component after submitting final payroll, the contractor must resume prevailing wage compliance for the additional work.
- The contractor must do the following:
  - ✓ Resubmit the previously final payroll as not final
  - ✓ Submit a Statement of Non-Performance covering the period between the last payroll submission and the start of the additional work
  - ✓ Continue payroll reporting from that point forward

SURGE Compliance Portal Questions

What is the SURGE Compliance Portal?

- The SURGE Compliance Portal (hosted on Submittable) is the official records collection system used by the CPUC's SURGE initiative.
- The SURGE team uses it to collect and store AB 2143 certified payroll records from all qualified renewable energy projects.

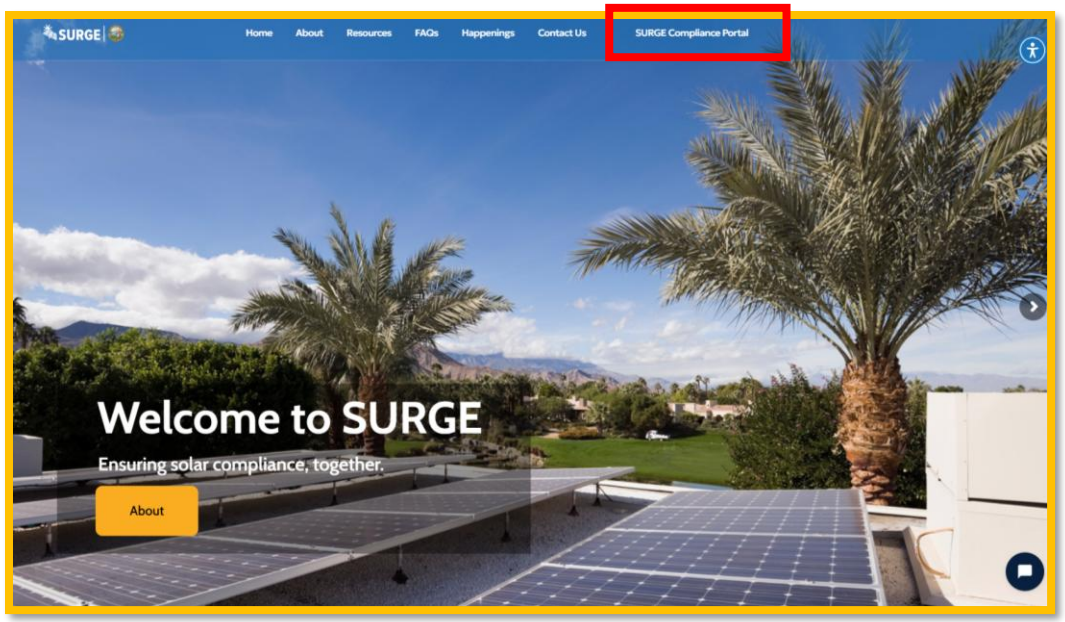
Portal Activity	Primes	Subs
Create a Free Submittable Account (One time)	Yes	Yes
Register as an AB 2143 Contractor (One time)	Yes	Yes
Register AB 2143 Projects (For each project)	Yes	No
Submit copies of CPRs for AB 2143 Projects (For each project; from project start to end date)	Yes	Yes

How do I access the Portal?

Contractors can access the SURGE Compliance Portal in two (2) ways.

Direct Link: cpucsurge.submittable.com/submit

SURGE Website: cpucsurge.org (top right corner)

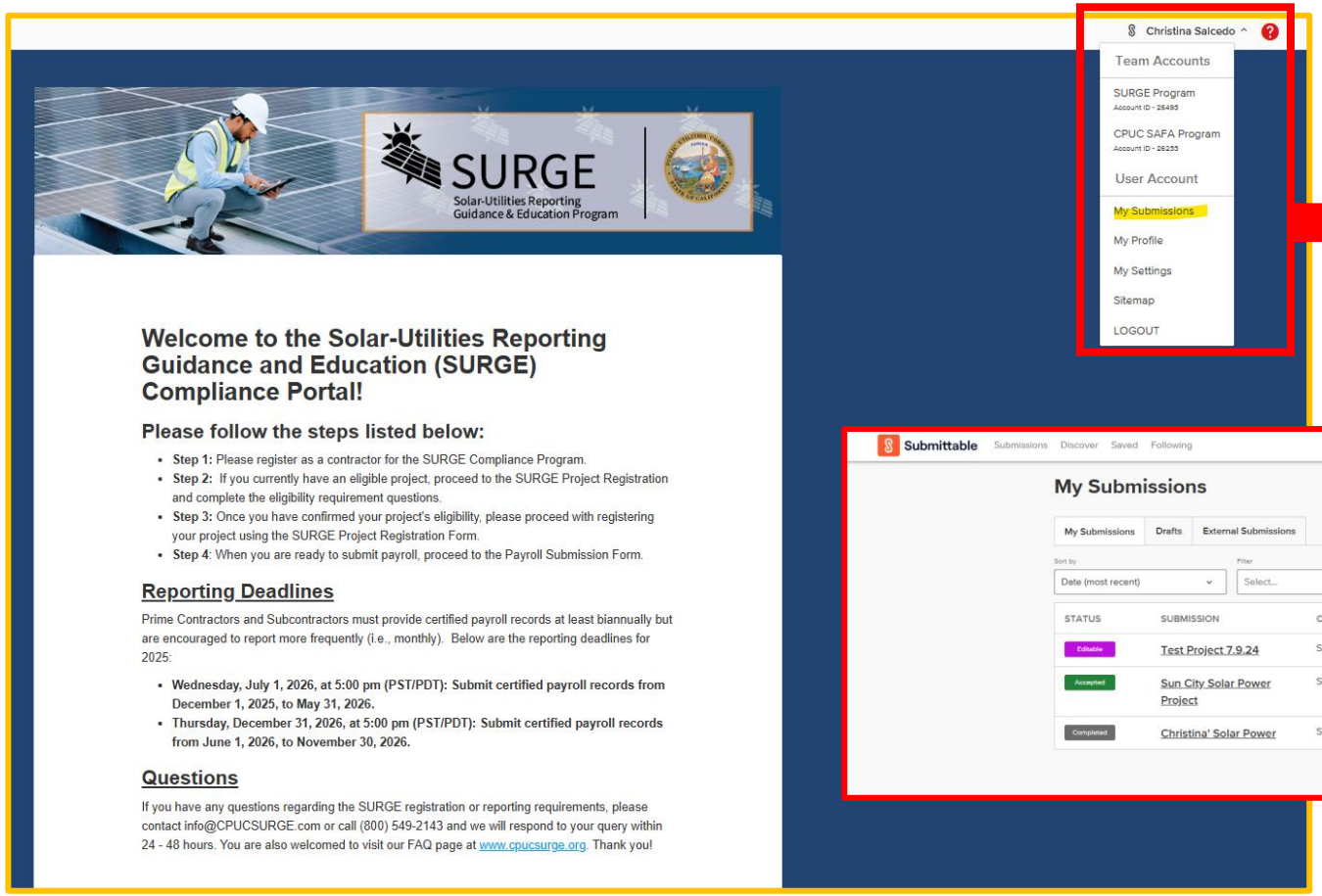


Who needs to use the Portal?

- Both Prime Contractors and Subcontractors must use the SURGE Compliance Portal to submit required AB 2143 documentation and copies of project CPRs.
  - Are you a first-time user? Create a FREE Submittable account. This setup is only required once.
  - Do you already have an account? Use login credentials to sign in.
- Helpful Tips
  - ✓ Use an email that is checked frequently
  - ✓ Maintain one login per organization
  - ✓ Share login credentials with your team to:
    - Ensure continuous access
    - Prevent compliance issues if staff changes occur

How do I see what I submitted?

Click your name and under the menu go to User Account > My Submissions to view your form submissions.



Important Reminder: December 31st Deadline

- The December 31st biannual deadline is coming up soon!
- Prime Contractors and Subcontractors with AB 2143 projects are required to submit copies of CPRs to the SURGE Compliance Portal.
  - Frequent submissions are encouraged! Don't wait until the day of the deadline to submit.
- Deadline: December 31st, 2026, at 5:00 PM (PST/PDT)
- Reporting Period for CPRs: June 1st, 2026 – November 30th, 2026
- Failure to meet this deadline may result in interconnection application processing delays.

Days left until the next deadline from today's webinar

Contact Us

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