



ADVICE LETTER SUMMARY



ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Peninsula Clean Energy Authority ("PCE")

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person: Jenna Sharp

Phone #: (650) 562-5668

E-mail: jsharp@peninsulacleanenergy.com

E-mail Disposition Notice to: jsharp@peninsulacleanenergy.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

September 27, 2024

Advice Letter (AL) #:38-E

Tier Designation: 2

Subject of AL: PENINSULA CLEAN ENERGY AUTHORITY'S DISADVANTAGED COMMUNITIES GREEN TARIFF AND COMMUNITY SOLAR GREEN TARIFF UPDATES PURSUANT TO DECISION 24-05-065

Keywords (choose from CPUC listing): Compliance, Tariffs

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.24-05-065

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: n/a

Summarize differences between the AL and the prior withdrawn or rejected AL: n/a

Confidential treatment requested? Yes No

If yes, specification of confidential information: n/a

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 10/28/24 No. of tariff sheets: 1

Estimated system annual revenue effect (%): n/a

Estimated system average rate effect (%): n/a

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: See Advice Letter

Service affected and changes proposed¹: See Advice Letter

Pending advice letters that revise the same tariff sheets: n/a

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Jenna Sharp
Title: Regulatory Analyst
Utility Name: Peninsula Clean Energy Authority
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ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	



September 27, 2024

California Public Utilities Commission
Energy Division
Attention: Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102-3298

PCE Advice Letter 38-E

RE: PENINSULA CLEAN ENERGY AUTHORITY'S DISADVANTAGED COMMUNITIES GREEN TARIFF AND COMMUNITY SOLAR GREEN TARIFF UPDATES PURSUANT TO DECISION 24-05-065

PURPOSE

Peninsula Clean Energy Authority ("PCE") hereby submits to the California Public Utilities Commission ("Commission" or "CPUC") this advice letter ("AL") for approval of modifications to its Disadvantaged Community Green Tariff ("DAC-GT") and Community Solar Green Tariff ("CSGT") reflecting the latest program availability, eligibility, and rules outlined in Decision ("D.") 24-05-065.

TIER DESIGNATION

Pursuant to D. 24-05-065, Ordering Paragraph ("OP") 9, this AL is submitted with a Tier 2 designation.

EFFECTIVE DATE

Pursuant to General Order 96-B and General Rule 7.3.4, PCE requests that this Tier 2 AL become effective 30 days following submittal, which is October 28, 2024.

BACKGROUND

On June 22, 2018, the Commission issued D.18-06-027 adopting three new programs to promote the installation of renewable generation among residential customers in disadvantaged communities

(“DACs”),¹ as directed by the California Legislature in Assembly Bill (“AB”) 327.² The three programs include the DAC Single Family Solar Homes (“DAC-SASH”) program, which provides up-front incentives for the installation of solar at low-income homes in DACs. The other two programs, the DAC-GT and the CSGT programs, are community solar programs that offer 100% renewable energy to residential customers and provide a 20% discount on the electricity portion of the customers’ bills.

Pursuant to D.18-06-027, Community Choice Aggregators (“CCAs”) may also develop and implement their own DAC-GT and CSGT programs.³ D.18-06-027 provides that CCAs must submit a Tier 3 AL to implement the CCA DAC-GT and CSGT programs (“Implementation AL”).⁴ Accordingly, PCE submitted its Tier 3 Implementation AL on December 22, 2020, to create DAC-GT and CSGT programs (PCE AL 11-E). On April 15, 2021, the Commission issued Resolution E-5124, which approved PCE’s DAC-GT and CSGT Implementation AL with modifications.⁵ Additionally, Resolution E-5124 approved PCE’s ability to procure new renewable energy resources specifically to serve DAC-GT customers.

On June 7, 2024, the Commission issued D.24-05-065 (“Decision”) which made several modifications to the DAC-GT and CSGT programs. The Decision discontinued the CSGT program and any program capacity was consolidated into the DAC-GT program.⁶ The Decision also modified siting requirements to allow eligible projects to be located no more than five miles from eligible DAC census tracts.⁷ The Decision also allocated additional DAC-GT program capacity to each Program Administrator who is close to being fully procured to allow the enrollment of an additional 50 percent of eligible customers.⁸ As a result of these modifications, PCE’s DAC-GT program capacity increased from 3.37 MW to 6.0125 MW.

PCE includes herein proposed modifications to its DAC-GT Tariff.

¹ DACs are defined under D.18-06-027 as communities that are identified in the CalEnviroScreen as among the top 25 percent of census tracts statewide, plus the census tracts in the highest five percent of CalEnviroScreen’s Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data. In October 2022, the Commission issued Resolution E-5212 approved the inclusion of CalEnviroScreen DACs into the DAC-GT and CSGT programs. Resolution E-5212 also amended program eligibility to be “additive” starting from the time at which a Program Administrator’s DAC-GT and CSGT implementation advice letter is approved and expanded eligibility to participate in these programs to all California Indian Country. OP 4 of Resolution E-5212 requires Program Administrators to submit updated DAC-GT and CSGT tariffs, solicitation protocols, and ME&O plans that reflect the latest program eligibility rules within 150 days of the issuance of Resolution E-5212 in a Tier 2 AL.

² AB 327 (Perea), Stats. 2013, ch 611.

³ D.18-06-027 at 104 (OP 17).

⁴ *Id.*

⁵ Resolution E-5124 at 32 (OP 1).

⁶ D.24-05-065 at 169 (OP 2).

⁷ D.24-05-065 at 170 (OP 3).

⁸ *Id.*

SUMMARY OF PCE TARIFF MODIFICATIONS

PCE requests approval of modifications to its DAC-GT and CSGT tariffs. The modifications in the DAC-GT and CSGT tariffs are reflected in the attached appendix and listed below:

Appendix A: DAC-GT Tariff Schedule (redline):

- *Applicability:* Edits were made to Section 1 related to paired storage, new siting requirements, and program availability. The definition of Qualified Facilities (“**QF**”) is expanded to include Renewable Portfolio Standard-eligible generating facilities paired with storage, to specify that QFs are located within or no more than 5 miles from a DAC in Pacific Gas and Electric Company’s service territory, and to clarify customers are enrolled via auto-enrollment.
- *Terms and Conditions:* Edits were made to Section 3 related to customer enrollment to clarify that auto-enrollment is used. Additionally, Section 3 now specifies that customers are eligible to remain on DAC-GT for up to 20 years or until there are not sufficient dedicated resources to support the program.
- *CSGT:* All mentions of the CSGT program are removed.

In addition to the DAC-GT tariff updates, PCE is updating the CSGT tariff by discontinuing per the Decision.

Lastly, PCE will continue to procure new renewable energy resources to serve DAC-GT customers under the modified DAC-GT program. Per Resolution E-5124, PCE will submit executed Power Purchase Agreements (PPA) under the DAC-GT program to the CPUC as a Tier 2 advice letter.⁹ These PPA submissions shall include sufficient detail to ensure the proposed projects are new incremental resources.

APPENDICES

The following appendices are included as a part of this AL:

- **Appendix A:** DAC-GT Tariff Schedule (redline)

CONCLUSION

PCE respectfully requests that the Commission approve its updated DAC-GT tariff with the updated eligibility language.

NOTICE

A copy of this AL is being served on the consolidated, official Commission service list for Rulemaking (“**R.**”) 14-07-002 and Application (“**A.**”) 22-05-022.

⁹ Resolution E-5124 at 34 (OP 8).

For changes to this service list, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

PROTESTS

Anyone wishing to protest this AL may do so electronically no later than 20 days after the date of this AL. Protests should be submitted to:

CPUC, Energy Division
Attention: Tariff Unit
Email: EDTariffUnit@cpuc.ca.gov

In addition, protests and all other correspondence regarding this AL should be sent by letter or transmitted electronically to the attention of:

Jenna Sharp
Regulatory Analyst
Peninsula Clean Energy Authority
2075 Woodside Road
Redwood City, CA 94061
Email: jsharp@peninsulacleanenergy.com

There are no restrictions on who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

CORRESPONDENCE

For questions regarding this AL, please contact Jenna Sharp by electronic mail at jsharp@peninsulacleanenergy.com.

/s/ Jeremy Waen

Jeremy Waen
Senior Director of Regulatory Policy
Peninsula Clean Energy Authority

cc: Service List: R.14-07-002 and A.22-05-022

Appendix A

**Electric Schedule DAC-GT, *Disadvantaged Communities
Green Tariff Program***

Effective Date: [TBD upon PCE Board approval]

Proposed by Peninsula Clean Energy Authority



Peninsula Clean Energy Authority Disadvantaged Communities Green Tariff Program¹

The purpose of the DAC-GT program is to provide eligible customers residing in disadvantaged communities (“DACs”) as defined in the Terms and Conditions below with a bill credit while also having their usage met with up to 100% renewable energy from qualified renewable generating facilities in DACs (“Qualified Facilities”).

APPLICABILITY

This program is available to residential ~~PCE~~Peninsula Clean Energy Authority (“PCE”) customers who are eligible for the California Alternate Rates for Energy (“CARE”) or Family Electric Rate Assistance (“FERA”) program and reside within a DAC.

Qualified Facilities are defined as new Renewable Portfolio Standard (RPS) eligible generating facilities and RPS-eligible generating facilities paired with storage with a nameplate rated generating capacity between 500 kW to 20 MW, that are located within or no more than 5 miles from a DAC in Pacific Gas and Electric Company’s (“PG&E”) service territory, and that supply energy to PCE via a Power Purchase Agreement for the purposes of ~~meeting~~supplying customer subscriptions under ~~this~~the DAC-GT program. Prior to new ~~qualified facilities~~Qualified Facilities coming online, PCE will serve DAC-GT customers on an interim basis utilizing existing resources that otherwise meet all of the requirements of the DAC-GT program. Once the new DAC-GT facilities come online, PCE’s DAC-GT customer subscriptions will be served by these projects.

This program is available to customers via auto-enrollment on a first-come, first-served basis until customer subscriptions reach PCE’s DAC-GT program cap. ~~Enrollment in the DAC-GT program will occur as specified in the Terms and Conditions below.~~ Once PCE reaches its DAC-GT program cap, a ~~wait list~~waitlist will be maintained for new subscriptions. When program capacity becomes available, PCE will auto-enroll new eligible customers on a first-come, first-served basis.

This program is not available to customers served under standby service, master-metered schedules, non-CARE/FERA eligible rates, Net Energy Metering rates, non-residential rates, ~~customers enrolled in PCE’s CSGT rate,~~ or to Direct Access customers or PG&E bundled customers.

This program ~~will be~~was available for customer participation as of ~~{date TBD, to be specified by PCE Board of Directors}~~February 1, 2022.

¹ The Disadvantaged Communities (“DAC-GT”) ~~and Community Solar Green Tariff (“CSGT”)~~ schedule ~~forms~~form in this appendix ~~are~~is provided for informational purposes to further support the California Public Utilities Commission’s (“Commission”) review of this Advice Letter. ~~These documents are~~This document is pending Peninsula Clean Energy Authority (“PCE”) Board review and approval and may be updated to reflect the disposition of the PCE Board but ~~are~~is provided herein as ~~examples~~an example of the ~~documents~~document PCE will utilize in implementing the ~~programs~~program upon Commission approval of the Advice Letter.

RATES AND CREDITS

Customers taking service on this rate schedule will receive a 20% discount on the electric portion of the bill compared to their otherwise applicable tariff (“OAT”), including PCE generation charges, PG&E transmission and distribution charges, and PG&E CCA CRS charges, and will be applied prior to the application of state and local taxes. This discount applies as long as customers are enrolled under the program and compliant with all the eligibility and enrollment terms.

For low-income customers enrolled in the CARE or FERA programs, the OAT is the customer’s existing CARE or FERA rate. Accordingly, the 20% discount for these customers will be applied to low-income customer bills after the CARE/FERA discount has been applied.

~~For customers who are not enrolled in CARE or FERA programs, the OAT is the customer’s existing rate schedule before program enrollment.~~ Residential customer Service Agreement IDs (“SA IDs”) that are already enrolled in PCE’s 100 % renewable energy generation service option when enrolling under the program will be defaulted to PCE’s base rate for the purposes of calculating the 20% discount.

TERMS AND CONDITIONS

1. **Customer eligibility.** To enroll in this program customers must meet the following eligibility criteria:
 - a. **PCE enrollment:** Program participants must be residential PCE customers. PG&E bundled customers and customers served by Direct Access providers are not eligible to participate in this program.
 - b. **CARE/FERA eligibility:** Customers must be eligible for the CARE or FERA program. If a customer is not already enrolled in CARE or FERA they may enroll in CARE or FERA prior to signing up for the DAC-GT. If they elect not to enroll in CARE or FERA, they will be required to certify their eligibility for one of these programs as part of the process of enrolling in the DAC-GT.
 - c. **Disadvantaged community:** The customer’s service address must be located in a DAC. For the purposes of this tariff, the California Public Utilities Commission (“Commission”) has defined a DAC as a census tract identified by the version of CalEnviroScreen in effect when a Program Administrator’s DAC-GT implementation plan was approved by the CPUC or any subsequent versions -as either scoring among the top 25% of census tracts statewide, or census tracts scoring in the highest 5% of the CalEnviroScreen’s Pollution Burden and that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data, or in California Indian Country as defined in 18 United States Code Section 1151, with the exception of privately held in-holdings, which are defined as non-Indian owned fee land located within the exterior boundaries of California Indian Country; in the event of multiple owners, such land shall be considered Indian owned if at least one owner is a tribe or tribal member,

regardless of the use of the land.

Pursuant to Resolution E-5212, census tract using CES criteria eligibility is additive. In the event the CalEnviroScreen tool is updated, customers whose service addresses are located in census tracts that either scored among the top 25% of census tracts statewide in a prior version of the CalEnviroScreen tool in effect on or after the date the Commission has approved a Program Administrator's DAC-GT implementation plan or as one of the census tracts in the top 5% of pollution burden as determined in a prior version of the CalEnviroScreen tool in effect on or after the date the Commission has approved a Program Administrator's implementation plan, may retain eligibility for DAC-GT, so long as such customer continues to meet all other eligibility criteria.

2. **Ineligible rates.** Customers served under the following rate schedules cannot concurrently participate in the DAC-GT:

- ~~a. Net Energy Metering Standby service;~~
- ~~a.b. Master-metered rate schedules;~~
- ~~b. Other 100% renewable energy rates including PCE's 100% ECO100 rate and CSGT;~~
- ~~c. Customers served under a master meter rate schedule;~~
- ~~d.c. Non-CARE/FERA eligible rates; and rate schedules;~~
- d. Net Energy Metering rate schedules;
- e. Non-residential rate schedules;
- f. Direct Access customers; and
- e.g. PG&E bundles customerd.

3. **Customer enrollment and term.** After the program start date, service under this program will become effective within two billing periods after PCE ~~receives a request from a customer to enroll in this program and PCE~~ has confirmed that the customer meets program eligibility requirements and that there is sufficient capacity to ~~serve~~auto-enroll the customer.

Customers subscribe to a percentage of the total capacity of all solar resources under the program based on their previous 12-month average monthly usage.² This percentage allocation is set at the time of customer subscription but may be revisited periodically to ensure accurate allocations of project capacity.

There is no minimum length of time that a customer must take service under this program. There is also no termination fee associated with de-enrolling from the DAC-GT program. In the event a customer elects to no longer receive service under this program, the change will become effective no later than two billing periods after the date that PCE receives the customer's request to de-enroll from the DAC-GT.

Customers are eligible to remain on the DAC-GT for a period of up to 20 years ~~from the~~

² If previous 12-month historical usage is not available, the average monthly usage will be derived from as many months as available. For customers establishing new service, the class average monthly usage will be used.

~~date they first began service under this, or until there are not sufficient dedicated resources to support the~~ program.

In the event that a customer turns off electric service at their current address and moves to a new location, ~~they will retain their status as a program participant if they still meet the eligibility requirements. Additionally, the customer's turn-on date at the new location must be within 90 days of the final billing date at their original location and PCE must receive the customer application within 90 days of the customer's turn-on date. If the customer opens up their new account at the new address under a different name,~~ the customer will need to recertify eligibility at the new location for service under this program. If they still meet the ~~eligibility~~forementioned requirements, the customer will retain their status as a program participant ~~as long as the customer's turn-on date at the new location is within 90 days of the final billing date at their original location and PCE receives the customer application within 90 days of the customer's turn-on date.~~

Customers who, after enrollment into the DAC-GT, become ineligible for CARE or FERA will be ~~de-enrolled~~unenrolled from this program.

4. **Maximum subscription per customer.** Enrollment in this program is capped at 2 megawatts for any single customer.
5. **Metering.** All customers must be metered according to the requirements of their OAT.