



# ADVICE LETTER SUMMARY

## ENERGY UTILITY

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

Company name/CPUC Utility No.:

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person:

Phone #:  
E-mail:  
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type:  Monthly     Quarterly     Annual     One-Time     Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL?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

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested?  Yes     No

If yes, specification of confidential information:

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:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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:

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<sup>1</sup>Discuss 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](mailto:EDTariffUnit@cpuc.ca.gov)

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

## 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	



Serving the San Mateo County Community

December 22, 2020

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

### **PCE Advice Letter 11-E**

**RE: ESTABLISH AND IMPLEMENT THE DISADVANTAGED COMMUNITIES GREEN TARIFF PROGRAM RATE AND THE COMMUNITY SOLAR GREEN TARIFF PROGRAM RATE**

Pursuant to Ordering Paragraph (“OP”) 17 of California Public Utilities Commission (“Commission or CPUC”) Decision (“D.”) 18-06-027, *Alternate Decision Adopting Alternatives to Promote Solar Distributed Generation in Disadvantaged Communities*, issued in Rulemaking (“R.”) 14-07-002 on June 22, 2018, and Resolution E-4999, issued on June 3, 2019, Peninsula Clean Energy Authority (“PCE”) hereby submits this Advice Letter (“AL”) to establish and implement the Disadvantaged Community Green Tariff (“DAC-GT”) and the Community Solar Green Tariff (“CSGT”) programs.

### **TIER DESIGNATION**

This AL has a Tier 3 designation pursuant to OP 17 of D.18-06-027.

### **EFFECTIVE DATE**

Pursuant to General Order 96-B, General Rule 7.3.4 and Energy Industry Rule 5.3, this Tier 3 AL will become effective upon adoption by the Commission of a resolution approving the AL. In order to most expediently and effectively serve its customers and to ensure sufficient time to incorporate the proposed budgets in PG&E’s 2022 ERRA Forecast Application, PCE requests an effective date on or before February 28, 2021.

### **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”)<sup>1</sup>, as directed by the California Legislature in Assembly Bill (“AB”) 327.<sup>2</sup> The three programs include the DAC Single Family Solar Homes 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% solar energy to 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 develop and implement their own DAC-GT and CSGT programs.<sup>3</sup> CCA tariffs must abide by all DAC-GT or CSGT rules and requirements adopted in D.18-06-027. D.18-06-027 also provides that CCAs must file a Tier 3 AL to implement the CCA DAC-GT and CSGT programs.<sup>4</sup> Resolution E-4999 provides that such advice letters must be filed on or before January 1, 2021.<sup>5</sup>

Clean Power Alliance of Southern California (“CPA”) was the first CCA to submit an AL to create both a DAC-GT and CSGT program. On November 9, 2020, the Commission issued Resolution E-5102 approving, with modifications, CPA’s AL and program documents. Marin Clean Energy and East Bay Community Energy also submitted program implementation ALs on May 7, 2020 (MCE AL 42-E) and September 11, 2020 (EBCE AL 14-E), respectively, which are pending disposition.

## **PURPOSE**

PCE files this Tier 3 AL to create DAC-GT and CSGT programs and tariffs consistent with all provisions in D.18-06-027, D.18-10-007<sup>6</sup>, Resolution E-4999, as well as guidance received from the Commission’s Energy Division.

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

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<sup>1</sup> DACs are defined under D.18-06-027 as communities that are identified in the CalEnviroScreen 3.0 as among the top twenty-five 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. Resolution E-4999 clarified that Program Administrators must file a Tier 1 Advice Letter to update program eligibility rules within thirty days of a new release of the CalEnviroScreen tool.

<sup>2</sup> AB 327 (Perea), Stats. 2013, ch 611.

<sup>3</sup> D.18-06-027 at 104 (OP 17).

<sup>4</sup> *Id.*

<sup>5</sup> Resolution E-4999 at 16.

<sup>6</sup> D.18-10-007, *Decision Correcting and Clarifying Decision 18-06-027* (October 18, 2018).

1. Appendix A: Implementation Plan for the DAC-GT and CSGT programs;
2. Appendix B: Schedule DAC-GT, *Disadvantaged Community Green Tariff Program* and Schedule CSGT, *Community Solar Green Tariff Program*;
3. Appendix C: Forecasted program budgets for program years (“PYs”) 2021 and 2022;
4. Appendix D: Marketing, education, and outreach (“ME&O”) plan for PYs 2021 and 2022;
5. Appendix E: Joint Letter re: CCA Program Capacity Transfer; and
6. Confidential Appendix F: Workpapers supporting the calculation of the generation cost delta and the 20% bill discount.

PCE respectfully requests that the Commission approve PCE’s program implementation plan, tariff sheets, and ME&O plan for the DAC-GT and CSGT programs as described in the appendices. Furthermore, PCE requests the Commission approve the budgets proposed budgets for PYs 2021 and 2022, as detailed in Appendix C, and direct Pacific Gas and Electric Company (“PG&E”) to:

1. Modify its DAC-GT and CSGT balancing accounts to include a sub-account to track the funding and costs of PCE’s DAC-GT and CSGT programs;
2. Include the total forecasted budget request for PYs 2021 and 2022 for PCE’s DAC-GT and CSGT programs in PG&E’s 2022 Energy Resource Recovery Account (“ERRA”) Forecast Application;
3. Within 30 days of the Commission’s approval of PCE program funds in PG&E’s 2022 ERRA Forecast Application, transfer all PCE program funds for the 2021 PY to PCE; and
4. Transfer PCE program funds for the 2022 PY to PCE in either an annual-basis disbursement for the upcoming PY, or in four quarterly installments by January 1, April 1, July 1 and October 1 for the upcoming quarter.

### **REQUEST FOR CONFIDENTIAL TREATMENT**

In support of this Advice Letter, PCE provides certain confidential information that is contained in Confidential Appendix F, which includes protected market sensitive/competitive data and corporate financial records. PCE requests confidential treatment of this information and provides the basis for this request in a confidentiality declaration submitted concurrently with this AL. The confidential information can be made available to non-market participants as required by D.20-07-005 after they have executed a nondisclosure agreement with PCE. To execute a nondisclosure agreement, please contact Joseph Wiedman at [jwiedman@peninsulacleanenergy.com](mailto:jwiedman@peninsulacleanenergy.com).

## **CONCLUSION**

PCE respectfully requests that the Commission approve the implementation details and budgets proposed herein by PCE to establish and implement its DAC-GT and CSGT programs pursuant to D.18-06-027.

## **NOTICE**

A copy of this AL is being served on the official Commission service lists for R.14-07-002.

For changes to this service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

## **PROTESTS**

**\*\*\*Due to the COVID-19 pandemic and shelter-at-home orders, PCE is currently unable to receive protests or responses to this AL via U.S. Mail or fax. Please submit protests or responses to this AL to [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov) and [jwiedman@peninsulacleanenergy.com](mailto:jwiedman@peninsulacleanenergy.com)\*\*\***

Anyone wishing to protest this AL filing may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this AL filing. Protests should be mailed to:

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

Copies should also be mailed to the attention of the Deputy Executive Director, Energy Division, Room 4004 (same address above).

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

Joseph F. Wiedman  
Director of Legislative and Regulatory Affairs  
Peninsula Clean Energy Authority  
2075 Woodside Ave  
Redwood City, CA  
Email: [jwiedman@peninsulacleanenergy.com](mailto:jwiedman@peninsulacleanenergy.com)

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

**CORRESPONDENCE**

For questions, please contact Joseph Wiedman by electronic mail at [jwiedman@peninsulacleanenergy.com](mailto:jwiedman@peninsulacleanenergy.com).

*/s/ Joseph F. Wiedman*

Joseph Wiedman  
Director of Legislative and Regulatory Affairs  
Peninsula Clean Energy Authority

cc: Service List: R.14-07-002



**Declaration of Joseph Wiedman Supporting Confidentiality Claim for Submission of Peninsula Clean Energy Authority Advice Letter 11-E, Establish and Implement the Disadvantaged Communities Green Tariff Program Rate and the Community Solar Green Tariff Program Rate**

In accordance with General Order 66-D, Decision (“D.”) 06-06-066, D.08-04-023, and D.20-07-005 for the submission of confidential information to the California Public Utilities Commission (“Commission”) in an Advice Letter (“AL”) filing, Peninsula Clean Energy Authority (“PCE”) submits the following declaration in support of its claim of confidentiality for the below-specified information provided in PCE Advice Letter 11-E: *Establish and Implement the Disadvantaged Communities Green Tariff Program Rate and the Community Solar Green Tariff Program Rate* (“PCE AL 11-E”).

The undersigned declares, under penalty of perjury, as follows:

1. In my capacity as the Director of Legislative and Regulatory Affairs, I have knowledge of the information provided in this declaration and am authorized to make this declaration on PCE’s behalf by PCE’s Chief Executive Officer, Jan Pepper.
2. In this Advice Letter Submission, PCE is securely and confidentially uploading the following documents to the Energy Division through the Commission’s File Transfer Protocol (“FTP”) system:
  - a. “PCE AL 11-E – Confidential”
  - b. “PCE Confidentiality Declaration”
3. In this Advice Letter Submission, PCE is publicly submitting the following documents to the Energy Division and the service list for Rulemaking 14-07-002 via email:
  - a. “PCE AL 11-E – Public”
  - b. “PCE Confidentiality Declaration”
4. Through this declaration, PCE requests that the “Confidential Appendix F – Workpapers Supporting the Calculation of the Generation Cost Delta and the 20% Bill Discount,” be treated as confidential and kept under seal.
5. This request for confidentiality is being made pursuant to the requirements and authority of Commission Decisions 06-06-066, 08-04-023, and 20-07-005, Commission General Order 66-D, California Civil Code 3426, California Evidence Code 1060, and California Government Code Sections 6254(k), 6255(a).

6. The attached “Table of Confidential Information” identifies the specific information that is subject to this confidentiality request, provides specific citations to the authority upon which each request is based, provides a granular justification for confidential treatment, and specifies the length of time that the information is to be kept confidential.
7. PCE is complying with the limitations on confidentiality specified in the D.06-06-066 Matrix (as amended by subsequent decisions) for the types of data being submitted subject to a request for confidentiality.
8. To the best of my knowledge, the information being submitted subject to this request for confidentiality is not already public.
9. As set forth below, Confidential Appendix F contains confidential and highly market-sensitive supporting documentation for PCE AL 11-E.
10. Confidential Appendix F cannot be aggregated, redacted, summarized, masked, or otherwise protected in a way that allows partial disclosure.
11. The following person is designated as the person for the Commission to contact regarding potential release of this information by the Commission:

Joseph Wiedman  
Director of Legislative and Regulatory Affairs  
Peninsula Clean Energy Authority  
2075 Woodside Road  
Redwood City, California 94061  
jwiedman@peninsulacleanenergy.com

Executed on December 22, 2020 at Redwood City, California

    /s/ Joseph Wiedman    

Joseph Wiedman  
Director of Legislative and Regulatory Affairs  
Peninsula Clean Energy Authority

**TABLE OF CONFIDENTIAL INFORMATION**

**PCE Advice Letter 11-E:**

Establish and Implement the Disadvantaged Communities Green Tariff Program Rate and the Community Solar Green Tariff Program Rate

<b>Redaction Reference</b>	<b>Authority For Confidentiality Request</b>	<b>Justification for Confidential Treatment</b>	<b>Length of Time Data To Be Kept Confidential</b>
<p>Confidential Appendix F – Workpapers Supporting the Calculation of the Generation Cost Delta and the 20% Bill Discount</p>	<p>ESP/CCA Matrix, Items II(A), (B)</p> <p>Commission General Order 66-D</p> <p>California Civil Code 3426</p> <p>California Government Code Sections 6254(k), 6255(a)</p> <p>California Evidence Code 1060</p>	<p>Appendix F contains information regarding PCE’s forecasted need for energy and resource adequacy capacity. This information falls into the identified protected categories in the ESP/CCA Matrix.</p> <p>Additionally, Appendix F contains information regarding PCE’s market position and price-related information. This information must be protected as market-sensitive and/or trade secret information. Even if no other authority applied to protect this information, the Commission must protect this information because the public interest in protecting the information clearly outweighs the public interest in disclosure. Disclosure here could provide valuable market sensitive information to market participants, erode PCE’s current or future contract negotiations, and create distortions in the resource adequacy and energy markets. In contrast, the public interest is minimal in public disclosure of pricing, forecasting, and procurement data for a single load serving entity.</p>	<p>Under Item II(A), (B), data is confidential for the first 3 years of the forecast period.</p>

# **APPENDIX A**

# Implementation Plan for the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs

Proposed by Peninsula Clean Energy Authority



**Joseph F. Wiedman**

Director of Legislative and Regulatory Affairs  
Peninsula Clean Energy Authority  
2075 Woodside Ave  
Redwood City, CA  
Email: [jwiedman@peninsulacleanenergy.com](mailto:jwiedman@peninsulacleanenergy.com)

December 22, 2020

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## 1. Introduction

In June 2018, the California Public Utilities Commission (CPUC or Commission) issued Decision (D.) 18-06-027, creating three new programs to promote the installation of renewable generation among residential customers in disadvantaged communities (DACs). One program is 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 Green Tariff (DAC-GT) and the Community Solar Green Tariff (CSGT) programs are community solar programs that offer 100% solar energy to customers and provide a 20% discount on the electric portion of participating customers' bills.

The DAC-GT program is available for residential customers who live in DACs and meet the income eligibility requirements for the California Alternate Rates for Energy (CARE) or Family Electric Rate Assistance (FERA) programs. The CSGT program is structured similarly to the DAC-GT program but is intended to drive more local, community-developed solar projects. The CSGT program requires community involvement with the solar project through a local sponsor and will result in a solar facility serving a nearby community.<sup>1</sup> The CSGT program is open to all residential customers located in a DAC, with at least 50% of the program's capacity reserved for CARE and FERA eligible customers.

Both programs are funded first through greenhouse gas (GHG) allowance proceeds. If such funds are exhausted, the programs will then be funded through public purpose program (PPP) funds.

Pursuant to D.18-06-027, Community Choice Aggregators (CCAs) may develop and implement their own DAC-GT and CSGT programs in addition to the Investor-Owned Utilities' (IOUs) programs. Resolution E-4999 allocated a portion of the program capacity to CCAs and determined that any CCA interested in running the programs must file an Implementation Advice Letter (AL) with the CPUC by January 1, 2021.

Peninsula Clean Energy Authority (PCE) is a joint powers authority consisting of the County of San Mateo and all of its cities. PCE operates a Community Choice Aggregation program for the 750,000 residents of San Mateo County. On October 22, 2020, the PCE Board of Directors voted to authorize the City of Los Banos as a new member of PCE. PCE anticipates expanding service and programs to the City of Los Banos starting in 2022.

PCE hereby submits this Implementation Plan for the DAC-GT and CSGT programs. This Implementation Plan includes the following sections:

- Customer Eligibility & Enrollment;

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<sup>1</sup> D.18-06-027 at 64.

- Rate & Discount Design;
- Procurement;
- Budget and Cost Recovery;
- Marketing, Education, and Outreach;
- Reporting; and
- Program Measurement & Evaluation

## 2. Customer Eligibility and Enrollment

This section establishes customer and sponsor eligibility and enrollment terms. These terms can also be found in the DAC-GT and CSGT tariff schedules, included as Appendix B.

### 2.1 DAC-GT Program

#### 2.1.1. Customer Eligibility

The DAC-GT program is available to residential customers who live in DACs, receive generation service from PCE, and meet the income eligibility requirements for the CARE program and/or the FERA program.<sup>2</sup> DACs are defined under D.18-06-027 as communities that are identified in the CalEnviroScreen 3.0 as among the top 25% of census tracts statewide, plus the census tracts in the highest 5% of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.<sup>3</sup>

Customer eligibility for the DAC-GT program is verified at the level of the Service Agreement ID (SA ID). Service accounts enrolled under the following rate schedules are not eligible to participate in PCE's DAC-GT program:

- IOU bundled service;
- Schedule S, where a customer's demand is regularly served by non-CCA supply;
- Net energy metering rates;
- Non-metered service;
- Rates that are not CARE- or FERA-eligible;
- Direct access customers;
- Non-residential rates; and

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<sup>2</sup> Customers must be eligible to participate in either the CARE or FERA programs, however customers are not required to be enrolled under those programs in order to be eligible to participate in DAC-GT. CARE/FERA eligibility is established as currently defined under those programs. Resolution E-4999 at 20.

<sup>3</sup> D.18-06-027, *Alternative Decision Adopting Alternatives to Promote Solar Distributed Generation in Disadvantaged Communities*, at 16 and 53.



- Master-metered customers<sup>4</sup>
- Schedule CSGT, Community Solar Green Tariff.

A customer's service under this schedule is portable within PCE electric service area as long as the customer continues to live in a DAC as defined under the program and continues to meet all other eligibility requirements. Customers who move can retain their status as a program participant provided that they have moved to an eligible service address. If the customer is found to still be eligible, they are not required to go on a waitlist, as long as capacity is available and the customer's turn-on date at the new location is within 90 days of their final billing date at their original location.

In the event that the CalEnviroScreen tool is updated and PCE has unsubscribed program capacity available, PCE will file a Tier 1 Advice Letter within 30 days of the release of the new version to update program eligibility rules. Customers who are already enrolled in DAC-GT will retain their eligibility even if their census tract is no longer considered a top 25% DAC under the revised CalEnviroScreen. PCE adopts this approach to minimize attrition from the program among eligible participants.

### **2.1.2. Customer Enrollment**

Customer enrollment under Schedule DAC-GT occurs at the level of the SA ID. Subscribing customers will receive 100% solar energy from the DAC-GT facility up to the enrollment cap and will receive a 20% discount on their otherwise applicable tariff for the enrolled SA IDs. Customer enrollment is capped at a maximum of 2 megawatts (MW) solar equivalent per SA ID.<sup>5</sup>

The DAC-GT program allows eligible customers to purchase renewable electricity produced by a pool of program solar projects for up to 100% of their electric usage. More specifically, customers subscribe to a percentage of the total program's capacity based on their previous 12-month average monthly usage.<sup>6</sup> The following example describes the calculation of the customer's subscription allocation in more detail: We assume for this example that a residential customer has an average historical usage at the time of enrollment based on the previous 12-months of 500 kilowatt hours (kWh) per month. The customer subscribes to a 100 kW program solar project with an estimated average monthly output of 21,900 kWh.<sup>7</sup> The customer's subscription allocation is then

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<sup>4</sup> PCE cannot ensure that all tenants under one master-meter are eligible for the CARE or FERA program, as the sub-metered tenants are not PCE direct customers. Hence, master-metered accounts are not eligible for the DAC-GT program.

<sup>5</sup> This limitation does not apply to a federal, state, or local government, school or school district, county office of education, the California Community Colleges, the California State University, or the University of California.

<sup>6</sup> 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.

<sup>7</sup> Based on a capacity factor of 30%.

calculated as a percentage of the average monthly output of the solar system (500 kWh/ 21,900 kWh = 2.3% of average monthly output). In this example, the customer will subscribe to 2.3% of the project's generation. This percentage allocation is set at the time of customer subscription but may be revisited periodically to ensure accurate allocations of project capacity.

In D.20-07-008, the Commission required Pacific Gas and Electric Company (PG&E) to implement automatic enrollment of certain eligible customers in their DAC-GT program.<sup>8</sup> D.20-07-008 does not explicitly direct CCAs to also implement automatic enrollment provisions under their DAC-GT programs. However, PCE is exploring the possibility of automatically enrolling customers in its DAC-GT program based on a prioritization of those at high risk of disconnection.

Customers interested in enrolling in the DAC-GT program can sign up with PCE online, by phone, or with a hardcopy application. PCE will verify customer eligibility based on service account address (to verify DAC census tract) and CARE/FERA enrollment status. If a customer is not currently enrolled in the CARE or FERA programs, they will be encouraged to enroll in the CARE/ FERA programs through the existing IOU enrollment process. PCE will support the customer as needed in the CARE/FERA application process with the utility. Once a customer's CARE/FERA eligibility has been established, PCE will enroll the customer under the DAC-GT program.

Customer enrollment will be available immediately upon program launch. Upon confirmation, the customer will be placed on the DAC-GT rate within two billing periods. There is no contract required when enrolling in the DAC-GT program. Customers may be enrolled for any number of months, and there is no enrollment or cancellation fee. Once a customer proactively un-enrolls from the program, they are prohibited from re-enrolling in the program for 12 months. A participating customer can remain on the DAC-GT tariff for the remaining duration of the project's contract term, or up to 20 years, whichever is less. Customers who, after enrollment into the DAC-GT Program, become ineligible for CARE or FERA will be de-enrolled from the DAC-GT program. Customer participation in the program automatically terminates should the power purchase agreement (PPA) between PCE or other load-serving entity and the developer for the DAC-GT facility to which the customer is subscribed be terminated or the delivery term ends.

Eligible customers may enroll in the program until customer subscriptions reach the capacity of the PCE DAC-GT program, based on the capacity required to meet the customer's forecasted annual load. Once PCE reaches its program cap, a wait list will be maintained for new subscriptions. When program capacity becomes available, PCE will enroll new eligible customers on a first-come, first-served basis up to the program cap.

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<sup>8</sup> D.20-07-008, *Decision Implementing Automatic Enrollment of Disadvantaged Communities Green Tariff*, at Ordering Paragraph (OP) 1.

## 2.2. CSGT Program

### 2.2.1. Customer Eligibility

The CSGT program is available to residential customers who live in DACs (as defined above) and receive generation service from PCE.<sup>9</sup> Non-residential customers are not eligible to participate, except for the project sponsor (see more information on sponsor eligibility rules below). A solar generation project supporting the program must be sited in a DAC within the same IOU service territory as the customers being served and must also be located within five miles of the participating customers' DAC census tract.<sup>10</sup> At least 50% of a project's capacity must be reserved by low-income customers, defined as those meeting the income qualifications for either the CARE or FERA programs.<sup>11</sup>

Customer eligibility is verified at the level of the SA ID. Service accounts enrolled under the following rate schedules are not eligible to participate in the CSGT program:

- IOU bundled service;
- Taking service under Standby Rates, where a customer's demand is regularly served by non-CCA supply;
- Net energy metering rate;
- Non-metered service;
- Direct access customers; and
- Schedule DAC-GT – Disadvantaged Communities Green Tariff.

Master-metered customers may participate in the CSGT program so long as they enroll all of their usage under the master-metered account in the program. Individual tenants of a master-meter customer are not eligible to participate on an individual basis. Master-metered customers must also meet all other eligibility requirements.

A customer's service under this schedule is portable within PCE electric service area as long as the customer continues to live in a DAC as defined under the program and

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<sup>9</sup> Customers who live in the San Joaquin Valley (SJV) pilot program communities (as defined in Rulemaking (R.) 15-03-010) are also eligible for the program even if their community is not among the top 25% DACs as defined by CalEnviroScreen. Currently, there are no CCAs in existence in the SJV pilot communities. However, if the SJV pilot communities expand, an existing CCA expands or a new CCA is created, those customers would also be eligible for the CCA CSGT program.

<sup>10</sup> Per D.18-12-015, *Decision Approving San Joaquin Valley Disadvantaged Communities Pilot Projects*, CSGT projects in SJV pilot communities can be located within a 40-mile radius of the pilot communities that the projects serve. As discussed above, there are currently no CCAs in existence in SJV pilot communities. However, if this changes, these locational requirements would also apply to CCA CSGT programs.

<sup>11</sup> As under the DAC-GT program, customers do not need to be currently enrolled under CARE/FERA to be eligible for the CSGT program. However, they will be encouraged to enroll under the CARE or FERA program through the existing IOU enrollment process when enrolling under the CSGT program.

continues to meet all other eligibility requirements (including the locational requirement). Customers who move retain their status as a program participant provided they have moved to an eligible service address. If the customer is found to still be eligible, they are not required to go on a waitlist, as long as capacity is available and the customer's turn-on date at the new location is within 90 days of their final billing date at their original location.

In the event that CalEnviroScreen is updated, PCE will file a Tier 1 AL within 30 days of the release of the new version to update program eligibility rules. As with the DAC-GT program, all customers in an eligible DAC at the time of a project's initial energy delivery date will remain eligible to subscribe to that CSGT project, even if their DAC designation changes in subsequent iterations of CalEnviroScreen. This grandfathered eligibility will apply to both existing subscribers and customers not previously subscribed to the project in that same DAC, in order to ensure that the project's output can be fully subscribed by customers whose census tract is within five miles of the project.

### **2.2.2. Customer Enrollment**

As with DAC-GT, customer enrollment will occur at the SA ID level. Customer enrollment is capped at a maximum of 2 MW solar equivalent per SA ID.<sup>12</sup>

The CSGT program allows eligible customers to purchase renewable electricity produced by a local community solar project for up to 100% of their electric usage. More specifically, customers subscribe to a percentage of the forecasted solar system's project generation based on their previous 12-month average monthly usage.<sup>13</sup> As previously described, participating customers will receive a 20% discount on their otherwise applicable tariff for enrolled SA IDs. Customers cannot be subscribed to more than one community solar facility at any time.

The following example describes the calculation of the customer's subscription allocation in more detail: We assume for this example that a residential customer has an average historical usage at the time of enrollment based on the previous 12-months of 500 kWh per month. The customer subscribes to a 100 kW community solar project with an estimated average monthly output of 21,900 kWh.<sup>14</sup> The customer's subscription allocation is then calculated as a percentage of the average monthly output of the solar system (500 kWh / 21,900 kWh = 2.3% of average monthly output). In this example, the customer will subscribe to 2.3% of the project's capacity. This percentage allocation is

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<sup>12</sup> This limitation does not apply to a federal, state, or local government, school or school district, county office of education, the California Community Colleges, the California State University, or the University of California.

<sup>13</sup> 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.

<sup>14</sup> Based on a capacity factor of 30%.

set at the time of customer subscription but may be revisited periodically to ensure accurate allocations of project capacity.

Customers interested in enrolling in the CSGT program can sign up with PCE online, by phone, or with a hardcopy application. PCE will verify customer eligibility based on service account address to verify DAC census tract and five-mile locational requirement. CARE/FERA enrollment status will also be identified to track subscription of low-income customers. Enrollment of new customers is available until 100% of project generation is subscribed. Enrollment attrition will be reviewed on a monthly basis, and the program will be available for new enrollments until the project is fully subscribed.

Low-income customers will be enrolled on a first-come, first-served basis. Once 50% of project capacity is subscribed by low-income customers, non-low-income qualified customers located in DACs will become eligible for enrollment. These customers can be recruited before the 50% subscription requirement for low-income customers is met. However, they will be placed on a waitlist until 50% of the project capacity is subscribed by low-income customers.

PCE will assess the subscription rate of low-income customers on a monthly basis after the PPA is awarded. If the low-income subscription rate drops below 50% over the life of the project, existing non-low-income customers are not required to go back on a waitlist. However, new enrollments of non-low-income program participants will be barred until the 50% low-income threshold is met again. During this time, new enrollments of non-low-income participants will be put on a waitlist. PCE will inform the Commission's Energy Division Director in writing if the low-income enrollment rate drops below 35% of project capacity.

Customer enrollment will be available immediately upon program launch. There is no contract required when enrolling for the CSGT program. Customers may be enrolled for any number of months, and there is no enrollment or cancellation fee. Once a customer proactively unenrolls from the program, they are prohibited from re-enrolling in the program for 12 months. A participating customer can remain on the CSGT tariff for the remaining duration of the project's contract term, or up to 20 years, whichever is less. Customer participation in the program automatically terminates should the PPA between PCE and the developer for the CSGT facility to which the customer is subscribed be terminated or the delivery term ends.

### **2.2.3. Sponsor Eligibility**

Under the CSGT program, community involvement must be demonstrated by a non-profit community-based organization (CBO) or a local government entity "sponsoring" a community solar project on behalf of residents.<sup>15</sup> Local government entities include

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<sup>15</sup> A CCA may not act as a sponsor for any CSGT projects in its own service territory. Resolution E-5102 (Clean Power Alliance of Southern California AL 4-E/E-A) at 11.

schools. The sponsor's role is to work with the project developer to encourage program participation in the community. Sponsors are also required to include job training and workforce development in their efforts to benefit the local communities which would benefit from their projects. Additional sponsor requirements are described in the Procurement section below.

To receive the 20% discount as described below, the sponsor must fulfill all of the following requirements:

1. The sponsor must be a PCE electric customer;
2. The sponsor must take service on the CSGT;
3. The sponsor must be located in the same geographic areas as any other customer, i.e., within a DAC with the solar project being located 5 miles from the sponsor's census tract;
4. 50% of the project's capacity must be subscribed by low-income customers; and
5. The sponsor must meet all other eligibility requirements of any participating customer as described in the section on CSGT customer eligibility above (including ineligible rate schedules).

CBOs or local government entities that do not fulfill all or any of these requirements may still become project sponsors; however, they are not eligible to receive the 20% discount.

There may be more than one sponsoring entity supporting a single community solar project. Multiple sponsors may receive the 20% discount as long as all sponsors meet the eligibility requirements outlined above. More detail on the sponsor bill discount can be found below.

A sponsor may also be (although is not required to be) a site host.<sup>16</sup>

#### **2.2.4. Sponsor enrollment**

Sponsors of a CSGT project are subject to the same enrollment rules and requirements as described above for residential customers participating in the program. For example, enrollment occurs at the level of the SA ID and is capped at a maximum of 2 MW of solar equivalent per SA ID.<sup>17</sup>

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<sup>16</sup> For the purposes of this program, the concept of a "host" only refers to a customer site where the project is located. The community solar project must be located in-front-of-the meter, even if located at a customer host site. Accordingly, all concepts and rules of an in-front-of-the-meter program continue to apply.

<sup>17</sup> This limitation does not apply to a federal, state, or local government, school or school district, county office of education, the California Community Colleges, the California State University, or the University of California.

The sponsor's subscription allocation is also calculated the same way as for any other participating customer, with one modification: a sponsor's subscription allocation is limited to a maximum of 25% of the project's energy output (not to exceed the sponsor's energy needs).

To illustrate this in more detail, we use the same example as before (100kW solar project with a monthly output of 21,900 kWh). We assume now that the total monthly usage among all the sponsor's eligible SA IDs is 10,000 kWh, which is larger than 25% of monthly project output (5,475 kWh). In this example, the sponsor's subscription allocation is limited to 25% of project output per month, and the sponsor will receive the discount on only 5,475 kWh.

If two or more sponsors are designated, the sponsors will need to inform PCE in writing of how the "discountable usage" (in this example, 5,475 kWh/monthly) are to be allocated between them.

### 3. Rate and Discount Design

This section describes the rules and requirements for providing the 20% bill discount to participating customers.

#### 3.1 Customer Bill Discount

Participants in both the DAC-GT and CSGT programs will receive a 20% discount on the electric portion of their bills compared to their otherwise applicable rates (OAR).<sup>18</sup> The discount applies as long as customers are enrolled under the programs and they comply with all the eligibility and enrollment terms described in PCE's DAC-GT and CSGT tariff sheets.

For low-income customers enrolled in CARE or FERA programs, the OAR is the customer's existing CARE or FERA rate.<sup>19</sup> 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, but are otherwise eligible to participate in those programs, the OAR is the customer's existing rate schedule before program enrollment. Residential customer SA IDs that are already enrolled in PCE's 100% renewable energy generation service option (i.e., PCE's "ECO100" rate) when enrolling under the programs, will be defaulted to PCE's base rate (i.e., PCE's "ECOplus" rate) for the purposes of calculating the 20% discount. In other words, PCE's ECOplus rate becomes the de-facto OAR for residential customers who are not on the CARE or FERA rate.

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<sup>18</sup> D.18-06-027 at 53, 74.

<sup>19</sup> Resolution E-4999, Conclusion 28 at 55.

A customer's electric portion of the bill consists of two main parts: (1) generation portion; and (2) delivery portion. CCAs, as the generation service provider, only have timely access to customers' generation charges, and therefore will only calculate the 20% discount for the generation portion of the electric bill. The respective utility (in PCE's case, PG&E) will be responsible for calculating the 20% discount of the delivery portion of the bill for CCA program participants.

More specifically, PCE proposes the following monthly discount calculation and billing procedures for PCE program participants:

1. PG&E sends PCE customer usage information;
2. PCE calculates the 20% discount of the generation portion of the electric bill;
3. PG&E applies the CARE/ FERA discount and then calculates the 20% discount of the delivery portion of the electric bill;
4. PCE sends PG&E generation charges for inclusion on the bill (reduced by the 20% bill discount);
5. PG&E compiles the bill, sends it to customer;
6. Customers send payment to PG&E;
7. PG&E transfers to PCE the appropriate generation charges (reduced by 20% bill discount) per established processes;
8. PCE recovers the revenue shortfall for providing the discount on the generation portion of the bill through the program's cost recovery mechanisms (see details below); and
9. PG&E recovers the revenue shortfall for providing the discount on the delivery portion of the bill through the program's cost recovery mechanisms.

In regards to bill presentment, the 20% bill discount on the generation portion of the bill will be shown on the PCE portion of the bill and the 20% discount on the delivery portion of the bill will be displayed on the PG&E portion of the bill.

### **3.2 Sponsor Bill Discount**

CSGT project sponsors who meet all of the eligibility requirements outlined above, will receive a 20% bill discount on enrolled SA IDs. The sponsor bill discount will be calculated based on the same methodology as described above for residential program participants with one modification. The sponsor bill discount is only applied to a sponsor's subscription allocation, i.e., limited to a maximum of 25% of the project's energy output (not to exceed the sponsor's energy needs under the enrolled SA IDs). The discount applies as long as sponsors are enrolled under the program and comply with all of the sponsor eligibility and enrollment terms described above. If two or more sponsors are designated, both sponsors must inform PCE in writing of how the "discountable usage", capped at 25% of the project's energy output, are to be allocated among them. PCE will then calculate the applicable discount to each sponsor accordingly.



The sponsor’s discount is available to sponsors only after the community solar project has reached its required minimum 50% low-income subscription rate. If, after reaching the required minimum 50% low-income subscription requirement, the subscription rate of low-income customers drops below 50% of project capacity at any time throughout the life of the project, the sponsor bill discount will not be revoked.

#### 4. Procurement

Per Resolution E-4999, Peninsula Clean Energy has been allocated 0.900 MW for its DAC-GT program and 0.230 MW for its CSGT program based on the proportional share of residential customers in DACs that PCE serves.<sup>20</sup>

Resolution E-4999 also allows CCAs that serve customers in the same IOU service territory to share and/or trade program capacity.<sup>21</sup> Some CCAs in PG&E’s service territory have elected to not pursue one or either of these programs and to forego their allocations per Resolution E-4999. These non-participating CCAs have elected to transfer their allocations to the participating CCAs in PG&E’s service territory. The CCA’s involved, both participating and non-participating, have agreed to equally distribute the transferred capacity in equal portions among the participating CCAs and have signed a joint letter of support to that effect. That letter is attached to this filing as Appendix E. As shown in the figures below, this transfer results in an increase of PCE’s program capacity by 0.336 MW for the DAC-GT program and 0.1725 MW for the CSGT program. As a result, PCE’s total capacity allocations are 1.236 MW for its DAC-GT program and 0.4025 MW for its CSGT program.

Figure 1: Capacity Transfer under the DAC-GT Program

Transferring CCA	Capacity being Transferred (MW)	Receiving CCAs				
		EBCE	CleanPowerSF	MCE	PCE	SJCE
SVCE	0.5	0.100	0.100	0.100	0.100	0.100
SCP	0.5	0.100	0.100	0.100	0.100	0.100
3CE	0.68	0.136	0.136	0.136	0.136	0.136
<b>TOTAL</b>	<b>1.68</b>	<b>0.336</b>	<b>0.336</b>	<b>0.336</b>	<b>0.336</b>	<b>0.336</b>

<sup>20</sup> Resolution E-4999, Table 1 at 14. Due to the continued growth and expansion of CCAs, PCE recommends that the Commission review CCA capacity allocations biennially and adjust the allocation of remaining program capacity in each IOU’s distribution service territory proportional to the then current share of residential customers in DACs. The first capacity allocation adjustment should occur by January 1, 2022 and every two years thereafter.

<sup>21</sup> E-4999, Findings and Conclusions 17 at 54.

Figure 2: Capacity Transfer under the CSGT Program

Transferring CCA	Capacity being Transferred (MW)	Receiving CCA			
		EBCE	CleanPowerSF	MCE	PCE
SJCE	0.36	0.0900	0.0900	0.0900	0.0900
SVCE	0.09	0.0225	0.0225	0.0225	0.0225
SCP	0.06	0.0150	0.0150	0.0150	0.0150
3CE	0.18	0.0450	0.0450	0.0450	0.0450
<b>TOTAL</b>	<b>0.69</b>	<b>0.1725</b>	<b>0.1725</b>	<b>0.1725</b>	<b>0.1725</b>

On October 21, 2020, the City Council of the City of Los Banos voted to join PCE and on October 22, 2020, the PCE Board of Directors voted to authorize the City of Los Banos as a member. PCE anticipates completing the associated expansion of its service and program offerings in 2022 which will include the addition of DAC census tracts. PCE has reached out to PG&E to discuss how to transfer any customers in Los Banos that are enrolled in PG&E’s programs to PCE’s programs so as not to disrupt the customers’ receipt of bill credits.

CCAs who serve customers in the same IOU service territory may elect to pool capacity allocations to offer a shared RFO for projects to serve their DAC customers provided that projects meet all eligibility requirements for the respective program.<sup>22</sup> PCE may exercise this option with other CCAs in PG&E’s service territory and will coordinate with those CCAs to explore offering a shared RFO. If an agreement to pool resources is reached among the CCAs, PCE will coordinate with Energy Division staff.

All renewable energy resources procured on behalf of customers participating in the DAC-GT and CSGT programs, as well as interim resources (if any), will comply with the California Air Resources Board’s (CARB) Voluntary Renewable Electricity Program. California-eligible GHG allowances associated with these purchases will be retired on behalf of participating customers as part of CARB’s Voluntary Renewable Electricity Program.

#### 4.1 DAC-GT Program

DAC-GT projects must be located in a DAC<sup>23</sup> within the same IOU service territory as the customers being served. Existing DAC-GT projects located in census tracts that were previously considered a DAC under the program but are no longer scored as such

<sup>22</sup> Resolution E-4999 at 16.

<sup>23</sup> As defined under the program, see above.

due to updates to the CalEnviroScreen tool, will continue to be eligible to serve customers under the DAC-GT program.<sup>24</sup>

PCE was assigned a capacity allocation of 0.900 MW for the DAC-GT program and allocated an additional capacity of 0.336 MW from non-participating CCAs for a total program capacity of 1.236 MW. Eligible projects must be sized between 500 kW and 20 MW. PCE will consider both full deliverability and energy-only projects in the solicitations.

PCE will issue DAC-GT solicitations once a year until the program cap is reached. The solicitation process will follow these guiding principles:

1. The project is selected through a competitive solicitation;
2. PCE executes a PPA with a developer for a solar project;
3. There is no direct relationship between the customer and the project developer;
4. Subscribing customers receive 100% renewable energy; and
5. Subscribing customers receive a defined bill credit.

Eligibility for procurement under the DAC-GT program requires that bid pricing must be at or below the statewide CCA cost cap provided to CCAs by the CPUC's Energy Division Staff via email on September 5, 2019.<sup>25</sup>

## 4.2 CSGT Program

CSGT projects must be sited in a DAC<sup>26</sup> within the same IOU service territory as the customers being served and must also be located within five miles of the benefitting customers' DAC census tract. CSGT projects located in census tracts that were previously considered a DAC under the program but are no longer scored as such due to updates to the CalEnviroScreen tool, will continue to be eligible to serve customers under the CSGT program.<sup>27</sup>

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<sup>24</sup> If the CalEnviroScreen tool is updated, Peninsula Clean Energy will file a Tier 1 Advice Letter within 30 days of the release of the new version to update program eligibility rules.

<sup>25</sup> Energy Division staff explains in the email from September 5, 2019 that CCAs are expected to compare the unadjusted project bids to the price cap. In other words, CCAs should use the price cap to screen the submitted bid prices before making adjustments to those prices such as time of delivery adjustments. Energy Division staff also clarified in the September 16, 2020 DAC-GT and CSGT Stakeholder Workshop that the value of the CCA cost cap will change when all three IOUs procure new resources under the Green Tariff Shared Renewables program or under the Renewable Auction Mechanism as-available-peaking category. Energy Division will notify the CCAs when this occurs. Workshop slides available at <https://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=6442462561>.

<sup>26</sup> As defined under the program, see above.

<sup>27</sup> In the event that the CalEnviroScreen tool is updated, Peninsula Clean Energy will file a Tier 1 Advice Letter within 30 days of the release of the new version to update program eligibility rules.

PCE was assigned a capacity allocation of 0.230 MW in Resolution E-4999 for the CSGT program and was also allocated 0.1725 MW from non-participating CCAs for a total program capacity of 0.4025 MW.<sup>28</sup> Eligible projects have no minimum size and a maximum size of 3 MW. PCE will consider both full deliverability and energy-only projects in the solicitations.

PCE will issue CSGT solicitations once a year until the program cap is reached. Solicitations will be run in conjunction with the DAC-GT program's solicitations. However, the DAC-GT and CSGT program will each have separate capacity allocations and bid requirements under the same solicitation. The solicitation process will follow the same guiding principles as for the DAC-GT program:

- The project is selected through a competitive solicitation;
- PCE executes a PPA with a developer for a solar project;
- There is no direct relationship between the customer and the project developer;
- Subscribing customers receive 100% renewable energy<sup>29</sup>; and
- Subscribing customers receive a defined bill credit.

Eligibility for procurement under the CSGT program requires that bid pricing must be at or below the statewide CCA cost cap provided to CCAs by the CPUC's Energy Division Staff via email on September 5, 2019.<sup>30</sup>

25% of each project's capacity must be subscribed by eligible low-income customers prior to permission to operate. If this requirement is not met, the project will not be able to begin delivery under the contract.<sup>31</sup>

Community sponsorship of the project by a CBO or local government is required to be eligible to bid for the CSGT program. Developers will be required to obtain and provide a letter of commitment from sponsors as part of the solicitation process. A letter of commitment from a sponsor must include all of the following:

1. Demonstration of substantial interest of community members in subscribing to the project;
2. Estimated number of subscribers, with justification to ensure project is sized to likely demand;
3. A preliminary plan to conduct outreach and recruit subscribers (which may be conducted in conjunction with the developer and/or PCE); and

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<sup>28</sup> Resolution E-4999, Table 1 at 14.

<sup>29</sup> See footnote with more details on the price cap in the DAC-GT program section above.

<sup>30</sup> Energy Division staff clarifies in its September 5, 2019, email that CCAs are expected to compare the unadjusted CSGT project bids to the price cap. In other words, CCAs should use the price cap to screen the submitted bid prices before making adjustments to those prices such as time of delivery adjustments.

<sup>31</sup> No interconnection or other project development processes will be influenced. The project can be finalized but payment on the delivery will not be started until 25% low-income customer subscription is achieved.

4. Siting preferences, including community-suggested host sites, and verification that the site chosen for the bid is consistent with community preference.

In addition to these solicitation requirements, D.18-06-027 also established several metrics for prioritization of CSGT project bids.<sup>32</sup> First, PCE will prioritize projects located in the top 5% census tracts of DACs per CalEnviroScreen 3.0. (if applicable). Second, PCE will grant priority for projects that leverage other government funding, or projects that provide evidence of support or endorsements from programs such as Transformative Climate Communities or other local climate initiatives. Third, PCE will also prioritize job training and workforce development factors and will require workforce development for all projects, including local hiring and targeted hiring, to enable creation of job opportunities for low-income communities.

To encourage the development of CSGT projects, PCE will provide support to local CBOs and project developers to identify potential community solar sites within its service territory as needed. As a local government agency, PCE has existing relationships within its communities that can be leveraged to enhance the success of the CSGT program.

## 5. Budget and Cost Recovery

This section describes the rules and requirements regarding program costs and budget, funding and cost recovery mechanisms, and the process of reviewing program costs.

### 5.1 Budget

Program Administrators (PAs) must submit annual program budget forecasts via a Tier 1 Advice Letter by February 1 of each year for the following program year (PY). Each Advice Letter must include separate program budget forecasts for the DAC-GT and CSGT programs and must clearly identify any costs that are shared between the programs.

Annual budget submissions will include, at a minimum, the following budget line items:

1. Generation cost delta, if any;<sup>33</sup>
2. 20% bill discount for participating customers;

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<sup>32</sup> D.18-06-027 at 82.

<sup>33</sup> Resolution E-4999 establishes that *above market* generation costs should include net renewable resource costs in excess of the otherwise applicable class average generation rate that will be used to calculate the customers' bills. In conversations with the CPUC's Energy Division after the release of the Resolution, it was clarified that this budget line item is intended to cover both a potential higher, as well as lower, cost of the DAC-GT/ CSGT resources than the otherwise applicable class average generation rate. Hence, the term is updated to state the "*Delta of generation costs* between the DAC-GT/ CSGT resources and the otherwise applicable class average generation rate."

3. Program administration costs; and
4. Marketing, education, and outreach (ME&O) costs.

### **Generation Cost Delta**

For subscribed energy, the generation cost delta is the net renewable resource costs and other generation-related costs used to support the program that are more or less than the customers' otherwise applicable class average generation rate.

PCE will calculate the generation cost delta by comparing the generation cost for DAC-GT and CSGT resources to the generation cost for the base product that customers would otherwise receive if they were not participating in the programs (i.e., PCE's ECOplus rate). The cost components are defined as follows:

- The generation cost for the base product (PCE's ECOplus rate) will be a weighted average of the generation costs of the product's renewable and non-renewable content, including Resource Adequacy;
- The generation cost for the DAC-GT program will be the weighted average of the generation costs of all solar projects under the program; and
- The generation costs for the CSGT program will be the generation costs of the specific solar project that the customer subscribes to.

The delta between the weighted average cost of the base rate and the generation cost of the DAC-GT or CSGT resource will then be multiplied by the volume served each month by each program to arrive at the total above-market generation cost or below-market generation savings from the program.

The above/below market generation costs, if any, will not be charged to participating customers and thus will not appear on the customers' bills. Instead, the cost delta, if any, will be tracked in the background and will be charged as program costs (or credits) and recovered through GHG allowance revenue and PPP funds as outlined below.

Because the facility will be contracted to PCE to provide all of its output, any potential above-market costs associated with unsubscribed output will also be covered by the same program funds that cover the above-market costs for subscribed customers of the program.<sup>34</sup> Unsubscribed project energy will be trued-up annually, and PCE will seek ways to create value in other avenues as deemed appropriate. Any revenue received will be applied as a credit towards program funds.

### **Participant Bill Discount**

As described above, program participants will receive a 20% discount on the otherwise applicable rate of eligible SA IDs. PCE's annual program budget will include the estimated total amount of revenue loss to be experienced by providing the 20% discount on the generation portion of the bill. More specifically, this calculation will be

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<sup>34</sup> D.18-06-027 at 83.

based on forecasted monthly enrollment in each program and average monthly bills by customer class.

### **Program Administration and ME&O Costs**

Under the DAC-GT and CSGT programs, PAs can recover all program administration and ME&O costs from program funds. PCE will track program costs for the DAC-GT and CSGT programs in separate accounts.

Administrative budget must be broken out into:

1. Program management;
2. Information technology (IT);
3. Billing operations'
4. Regulatory compliance; and
5. Procurement.

Marketing, education and outreach (ME&O) costs must be broken out into:

1. Labor costs;
2. Outreach and material costs; and
3. Local CBO/sponsor costs (for CSGT only).

Resolution E-4999 establishes a budget cap of 10% of the total budget for program administration costs and a budget cap of 4% of the total budget for ME&O costs.<sup>35</sup> However, administrative and ME&O costs may be higher than these budget allocations in the first two years of program implementation, acknowledging that program start-up costs may be higher.

### **Program Evaluation Costs**

The DAC-GT and CSGT programs must be reviewed by an independent evaluator every three years. The first independent evaluator review of the utilities' DAC-GT and CSGT programs is scheduled for January 1, 2021.

As CCA programs will launch after the utilities' programs, PCE proposes that the first evaluation of the CCAs' programs not occur before January 1, 2023. Responsibilities for funding the independent evaluator review will remain with the IOU for each service territory in which a CCA resides. One statewide Independent Evaluator will evaluate all IOU and CCA DAC-GT and CSGT programs statewide.<sup>36</sup> Thus, program evaluation costs will not be included in SJCE's program budget.

In addition to budget forecasts, annual program budget submissions must also include the following details on program capacity and customer enrollment numbers for both programs:

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<sup>35</sup> Resolution E-4999 determines that PAs can submit a Tier 3 Advice Letter requesting an adjustment to the budget allocations if the need arises. Resolution E-4999 at OP 2.

<sup>36</sup> Resolution E-5102 at 8.

1. Existing capacity at previous PY's close;
2. Forecasted capacity for procurement in the upcoming PY;
3. Customers served at previous PY's close; and
4. Forecasted customer enrollment for the upcoming PY.

Finally, Confidential Appendix F includes the following confidential information:

1. Workpaper for the calculation of the generation cost delta; and
2. Workpaper for the calculation of the 20% bill discount to participating customers.

Supporting worksheets used in substantiating cost estimates, including direct labor, management and/or supervisor costs, and any vendor costs, along with a breakdown of staff or contractor position descriptions, loaded hourly rates, and total hours anticipated for each task, will be provided if available.

Program costs will not be charged to participating customers and will thus not appear on customers' bills. Instead, the cost categories described above will be tracked and charged as program costs to the DAC-GT and CSGT programs.

PCE submits a budget estimate for PYs 2021 and 2022 in Appendix C to the Implementation Advice Letter.

## **5.2 Budget Forecasting and Reconciliation Procedures**

PCE will file, by February 1 of each PY, a Tier 1 Budget Advice Letter.<sup>37</sup> In this Annual Budget Advice Letter filing, PCE will, for each program separately:

1. Request approval of its **forecasted budget** for the upcoming PY (e.g., by February 1, 2022 for the 2023 PY);
2. Report its **actual expenditures** during the prior PY (e.g., by February 1, 2022 for the 2021 PY); and
3. **Reconcile** the prior year's budget forecast with actual expenditures.

### **Budget Forecast**

PCE will forecast estimated program cost for the upcoming PY for all budget categories described above. For the projected revenue loss associated with providing the 20% discount to customers, PCE will estimate the total expected revenue loss for the generation portion of the electric bill. PG&E will estimate the total expected revenue loss for the delivery portion of the electric bill.

### **Report Actual Expenditures**

PCE will report on actual expenditures for the previous PY for all budget categories described above. For the actual revenue loss associated with providing the 20% discount to customers, PCE will report on the actual total revenue loss for the

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<sup>37</sup> The budgets for PY 2020 and 2021 are included in Appendix C, hence no additional Tier 1 Advice Letter will be required by February 1, 2020 for the 2021 PY.



generation portion of the electric bill. PG&E will report on the total actual revenue loss for the delivery portion of the electric bill.

The Annual Budget Advice Letter will be the mechanism for the Commission and stakeholders to review PCE actual program costs and performance. Based on the information provided in PCE's Annual Budget Advice Letter, PG&E can include a summary of actual program expenditures for the previous PY in the Energy Resource Recovery Account (ERRA) Compliance Review.

### **Budget Reconciliation**

In the Annual Budget Advice Letter, PCE will true up forecasted program costs against actual expenditures by budget category for the prior PY. Any unspent funds from the prior PY will be used to offset the forecasted budget for the upcoming PY. If actual expenditures exceeded the forecast in the previous PY, PCE will add the shortfall to the forecasted budget for the upcoming PY.

### **5.3 Cost Recovery Procedures**

Pursuant to D.18-06-027, the DAC-GT and CSGT programs are funded first through available GHG allowance proceeds. If such funds are exhausted, the programs will be funded through PPP funds. More specifically, if total forecasted annual program costs for the programs for all PAs in an IOU's service territory (i.e., IOU and CCAs) are less than the estimated GHG allowance revenues available for the programs in that IOU's service territory, all estimated program costs will be set aside from GHG allowance revenues. If total forecasted annual program costs for all PAs in an IOU service territory are greater than the GHG allowance revenues available for the programs, all available GHG allowance revenues will be set aside for the programs, and the shortfall in funds will be allocated to PPP funds.

D.18-06-027 authorizes CCAs to access GHG allowance revenues and/or PPP funds to run the DAC-GT and CSGT programs.<sup>38</sup> The IOUs administer the GHG allowance revenues and collect PPP funds, and have established balancing accounts for the DAC-GT and CSGT programs. CCAs are not in the position to either access those funds directly or establish balancing accounts to track program costs. Therefore, PCE requests that the Commission direct PG&E to modify its DAC-GT and CSGT balancing accounts to include a sub-account to track the funding and costs of PCE's DAC-GT and CSGT programs. Additionally, PG&E will be responsible for determining and tracking whether and how much of the funding for PCE's DAC-GT and CSGT programs comes from GHG-allowance revenues versus PPP funds, in accordance with the methodologies defined above.

Once the Commission approves PCE's Annual Budget Advice Letter, PG&E will include the total budget estimate for the upcoming PY for PCE's DAC-GT and CSGT programs in the ERRA Forecast filing due in early June of each year. Once PG&E receives

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<sup>38</sup> D.18-06-027, OP 17 at 104.

approval of its ERRA Forecast from the Commission, PG&E will set aside the requested PCE budget for the following budget categories in a sub-account of its DAC-GT and CSGT balancing accounts:

1. Generation cost delta
2. Bill discount (generation portion)
3. Program administration costs
4. ME&O costs
5. Program evaluation costs

PG&E will then transfer program funds for these budget categories to PCE in either an annual-basis disbursement for the upcoming PY, or in four quarterly installments (by January 1, April 1, July 1 and October 1 of each year) for the upcoming quarter.

If the ERRA Forecast is not approved by January 1 of a given PY, PG&E will transfer all past due funds to PCE within 30 days of issuance of such approval.<sup>39</sup>

## 6. Marketing, Education, and Outreach

PCE will establish an ME&O program to promote customer participation in the DAC-GT and CSGT programs. PCE plans to directly implement the ME&O program and execute outreach.

PCE is submitting an ME&O plan for PYs 2020-2021 as Appendix D.<sup>40</sup> The ME&O plan discusses specific methods for customer outreach, including any coordination with CBOs and community sponsors, for each of the programs separately. The plan addresses how PCE will work to identify residential customers in DACs who are likely eligible for the CARE and FERA programs, but who are not yet enrolled. Finally, the plan discusses how to leverage existing customer programs to market the DAC-GT and CSGT programs.

PCE will file annual ME&O plans and detailed budgets by February 1 of each year for the upcoming PY, starting in 2022.

## 7. Reporting

Within 30 calendar days after the end of each calendar quarter, PCE will file a quarterly report for both programs, distinguishing between the DAC-GT and CSGT program data. The quarterly report will detail:

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<sup>39</sup> In 2021, depending on the timing of the Commission's approval of this Advice Letter, PG&E will include both the PY 2021 and PY 2022 budget estimates in its 2022 ERRA Forecast filing in early June or its 2022 ERRA November update. Once the 2022 ERRA Forecast is approved, PG&E will transfer all past due PY 2021 funds within 30 days of issuance of such approval.

<sup>40</sup> The ME&O plan and budget for PY 2021 are subject to change depending on the date of approval of the Implementation Advice Letter.

- Procured capacity;
- Online capacity;
- Identify the DAC(s) in which project(s) are located;
- Number of participating customers in each DAC within PCE's service territory; and
- Number of customers who have successfully enrolled in CARE and FERA in the process of signing up for the DAC-GT or CSGT programs.

The quarterly report will be filed in R.14-07-002 and served onto the same service list.

Semi-annually, within 30 calendar days after the end of each six-month period of the year, PCE will report the following information for CSGT projects to the Commission's Energy Division Central Files:

- Number of income-qualified customers subscribed to each project and the capacity those customers are receiving;
- Whether a waitlist of non-income-qualified customers exists and the number of customers on that list;
- If project sponsors are receiving bill credits under CSGT projects and the size of each sponsor's subscription; and
- The number of master-metered properties served on the CSGT tariff and the total capacity those properties are subscribed to receive

PCE's first quarterly or semi-annual report will be filed on the first scheduled due date after customer enrollment begins.

## 8. Program Measurement and Evaluation

An independent evaluator will review the utilities' DAC-GT and the CSGT programs every three years beginning in 2021.<sup>41</sup> The CSGT program must also be assessed by the same independent evaluator one year after program launch.<sup>42</sup>

PCE proposes commencing independent evaluation for CCA DAC-GT and CSGT programs at the beginning of the upcoming PY after customers have been enrolled under the program for a minimum of one full year (e.g., if the DAC-GT program were to launch with interim resources by the spring of 2021, the first program evaluation would

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<sup>41</sup> The CPUC's Energy Division will select the independent evaluator through a Request for Proposal (RFP) process managed by San Diego Gas & Electric Company on behalf of the Commission. The RFP process will be led by staff from the Commission's Energy Division, and Energy Division staff will make the final decision on the winning bidder.

<sup>42</sup> Resolution E-4999 clarified that it is appropriate to interpret the first year of the CSGT program as the first-year customers are able to subscribe to projects. Thus, if no customers have subscribed to CSGT projects by 2021, the initial independent evaluator review in 2021 will replace the evaluation of the CSGT program after the first year.

occur on January 1, 2023). Responsibilities for funding the independent evaluator review will remain with the IOUs for each service territory in which a CCA resides. One statewide Independent Evaluator will evaluate all IOU and CCA DAC-GT and CSGT programs statewide.<sup>43</sup>

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<sup>43</sup> Resolution E-5102 at 8.

# **APPENDIX B**

**Electric Schedule DAC-GT, *Disadvantaged Communities Green Tariff Program*, and Schedule CSGT, *Community Solar Green Tariff Program***

*Effective Date: [TBD upon Commission approval]*

Proposed by Peninsula Clean Energy Authority



**Peninsula Clean Energy Authority**  
**Disadvantaged Communities Green Tariff**  
**Program<sup>1</sup>**

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 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 eligible generating facilities with a nameplate rated generating capacity between 500 kW to 20 MW that are located within 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 customer subscriptions under this program. Prior to new 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 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 will be maintained for new subscriptions. When program capacity becomes available, PCE will 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 available for customer participation as of [date TBD, to be specified by PCE Board of Directors].

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<sup>1</sup> The Disadvantaged Communities (“DAC-GT”) and Community Solar Green Tariff (“CSGT”) schedule forms in this appendix are provided for informational purposes to further support the California Public Utilities Commission’s (“Commission”) review of this Advice Letter. These documents are pending Peninsula Clean Energy Authority (“PCE”) Board review and approval and may be updated to reflect the disposition of the PCE Board but are provided herein as examples of the documents PCE will utilize in implementing the programs 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, identified by the CalEnviroScreen 3.0 as scoring among the top 25% of census tracts statewide, or census tracts scoring in the highest 5% of the CalEnviroScreen’s Pollution Burden, but that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data. In the event the census tract in which a customer resides is not scored as a top 25% DAC in a subsequent version of the CalEnviroScreen tool or as one of the census tracts in the top 5% of pollution burden, the customer may retain their eligibility for DAC-GT.
2. **Ineligible rates.** Customers served under the following rate schedules cannot concurrently participate in the DAC-GT:



- a. Net Energy Metering 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. Non-CARE/FERA eligible rates; and
  - e. Non-residential rate schedules.
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 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.<sup>2</sup> 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 date they first began service under this program.

In the event that a customer turns off electric service at their current address and moves to a new location, the customer will need to recertify eligibility at the new location for service under this program. If they still meet the eligibility 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 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.

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<sup>2</sup> 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.

**Peninsula Clean Energy Authority**  
**Community Solar Green Tariff Program**

The purpose of the Community Solar Green Tariff (“CSGT”) program is to provide eligible customers in disadvantaged communities (“DACs”) with a bill credit while also having their usage met with up to 100% renewable energy from qualified renewable generating facilities in disadvantaged communities (“Qualified Facilities”).

**APPLICABILITY**

This program is available to Peninsula Clean Energy Authority (“PCE”) residential customers who meet the following eligibility requirements:

1. Customer must be eligible for the California Alternate Rates for Energy (“CARE”) or Family Electric Rate Assistance (“FERA”) program (“Qualifying Customers”);
2. Customer must reside in a census tract that is within a DAC as defined in the Terms and Conditions below; and
3. Customer must reside in a census tract that is within five miles of a community solar facility (“CS Facility”) as defined below.

Once 50% of a CS Facility’s output is subscribed by Qualifying Customers, this program is also available to:

1. Residential customers who are not eligible for the CARE or FERA program but reside within a DAC as well as a census tract that is within five miles of the CS Facility (“Non-qualifying Customers”); and
2. Community Sponsors, as defined in the Community Sponsor section of this tariff.

This program will be available for Qualifying Customer participation once a CS facility has achieved commercial operation and for Non-qualifying Customers once the subscription rate for Qualifying Customers reaches the 50% threshold. This program is not available to customers served under a Net Energy Metering rate schedule, Standby service, Non-metered service, customers enrolled in PCE’s Disadvantaged Communities Green Tariff (“DAC-GT”) rate, or to Direct Access or Pacific Gas and Electric Company (“PG&E”) bundled customers.

Customers served under a master-metered schedule are eligible for this program once 50% of the CS Facility output is subscribed with Qualifying Customers. Master-metered customers may participate in the CSGT program so long as they enroll all of their usage under the master-metered account in the program. Individual tenants of a master-meter customer are not eligible to participate on an individual basis. Master-metered customers must also meet all other eligibility requirements.

This program is available to customers until PCE’s CSGT program cap is reached. However, an individual CS Facility may be smaller, and enrollment toward each CS Facility will be capped at

the capacity of that facility. Once PCE's CSGT program cap is reached for one or all CS Facilities, a wait list will be maintained for new subscriptions. When program capacity becomes available, PCE will enroll new eligible customers on a first-come, first-served basis with priority given to Qualifying Customers.

## **COMMUNITY SOLAR FACILITIES**

For the purpose of this tariff, a CS Facility is defined as a Renewable Portfolio Standard ("RPS") eligible generating facility that is located within a DAC and within five miles of the census tracts in which subscribing customers reside. CS Facilities may have a nameplate rated generating capacity no larger than 3 MW for any one project. The developer of a CS Facility must enter into a Power Purchase Agreement ("PPA") with PCE for the sale and purchase of the power produced by the facility, and is responsible for developing and operating the CS Facility and partnering with one or more Community Sponsors for the project (see below for more information). Customers served by this program are not parties to the PPA and are not third-party beneficiaries to the PPA.

A CS Facility will retain its eligibility to serve customers under this program throughout the life of that project, even if the local qualified DAC designations change in subsequent iterations of CalEnviroScreen.

## **COMMUNITY SPONSORS**

Each CS facility must have one or more Community Sponsors. Community Sponsors are local non-profit community-based organizations or local government entities, including schools, located in PCE's service territory. Community Sponsors must demonstrate community involvement and awareness by sponsoring a CSGT project on behalf of the residents.

A Community Sponsor located within a DAC and in a census tract that is within five miles of the CS facility may take service under this program and is eligible for a 20% bill credit for usage up to 25% of the project's estimated output, not to exceed the Community Sponsor's energy needs. Any usage above 25% of the project's energy output will be billed at the Community Sponsor's OAT and is not eligible for the 20% bill credit. The 20% bill credit will apply to the eligible portion of the Community Sponsors bill once 50% of the project's capacity has been subscribed by Qualified Customers. Multiple Community Sponsors can sponsor a single CSGT project and share in the 20% percent bill credit up to 25% of the project's energy output provided that all sponsors meet the eligibility requirements above.

## **RATES AND CREDITS**

### **1. Residential Customer Rates**

Customers taking service under this rate schedule will receive a 20% discount on the electric portion of the bill compared to their otherwise applicable tariff ("OAT"). This discount applies as long as customers are enrolled under the program and compliant with all the eligibility and enrollment terms.

For 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 or 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 programs will be defaulted to PCE's base rate for the purposes of calculating the 20% discount.

## 2. Sponsor Rates

CSGT project sponsors who meet all of the eligibility requirements outlined above receive a 20% bill discount on enrolled SA IDs. The sponsor bill discount will be calculated based on the same methodology as described above for residential program participants with one modification. The sponsor bill discount is only applied to a sponsor's subscription allocation, i.e., limited to a maximum of 25% of the project's energy output (not to exceed the sponsor's energy needs under the enrolled SA IDs). This discount applies as long as sponsors are enrolled under the programs and compliant with all the sponsor eligibility and enrollment terms described above.

If two or more sponsors are designated, both sponsors must inform PCE in writing of how the "discountable usage," capped at 25% of the project's energy output, are to be allocated among them. PCE will then calculate the applicable discount to each sponsor accordingly.

The sponsor's discount is available to sponsors only after the CSGT project has reached its required minimum 50% Qualifying Customer subscription rate. If the subscription rate of Qualifying Customers drops under 50% of project capacity at any time throughout the life of the project, the sponsor bill credit will not be revoked.

## TERMS AND CONDITIONS

1. **Customer eligibility.** To enroll in this program customers must meet the following eligibility criteria:
  - a. **PCE enrollment:** To receive service under this program, participants must be PCE customers. PG&E bundled customers and customers served by Direct Access providers are not eligible to participate in this program.
  - b. **Disadvantaged community:** The customer's service address must be located in a DAC, identified by the CalEnviroScreen 3.0 as scoring among the top 25% of census tracts statewide, or census tracts scoring in the highest 5% of the CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

In the event the census tract in which a customer resides is not scored in a subsequent version of the CalEnviroScreen tool as a top 25% DAC or as one of the census tracts in the top 5% of pollution burden, the customer may retain their eligibility for CSGT.

- c. **Proximity to CS Facility:** Customers must reside in a DAC census tract that is within five miles of a CS Facility.
  - d. **CARE or FERA eligibility:** The first 50% of the output of a CS Facility will be reserved for residential customers who meet the other eligibility requirements and are eligible for the CARE or FERA program (“Qualifying Customers”). 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 CSGT.
  - e. **Non-qualifying Customers:** After 50% of the output of a CS Facility has been subscribed by Qualifying Customers, non-qualifying residential customers as defined in the Applicability section of this tariff, including customers served under a master-meter rate schedule, may enroll in the program and receive the 20% CSGT credit.
  - f. **Community Sponsors:** After 50% of the output of a CS Facility has been subscribed by Qualifying Customers, Community Sponsors may enroll eligible service accounts and receive the 20% CSGT credit, subject to the conditions and limitations listed in the Community Sponsors section of this tariff.
2. **Participation in Demand Response programs.** Customers served by this program can concurrently participate on any Demand Response (“DR”) Programs for which they are otherwise eligible. All DR payments and credits are based on a customer’s metered usage and are not impacted by participation in this program.
  3. **Ineligible rates.** Customers served under the following rate schedules cannot concurrently participate in the CSGT:
    - a. Net Energy Metering schedules;
    - b. Standby service; and
    - c. PCE’s DAC-GT Program.
  4. **Customer enrollment and term.** After a CS Facility has achieved commercial operation, service under this Schedule shall become effective within two billing periods after PCE receives an enrollment request from a customer and PCE has confirmed that the customer meets program eligibility requirements.

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 CSGT.

In the event that a customer turns off electric service at their current address and moves to a new location, the customer will need to recertify eligibility at the new location for service under this program. The customer will retain their status as a program participant as long as the customer meets all eligibility criteria, program capacity is available, the customer's turn-on date at the new location is within 90 days of the final billing date at his/her previous location and the application is received by PCE within 90 days of the turn-on date.

Service under this program will automatically terminate at the start of the next billing period if the PPA between PCE and the developer of the CS facility to which the customer is subscribed is terminated or the delivery term ends.

7. **Maximum subscription per customer.** The load served by PCE to an individual customer under this program (subscription) is capped at 2 megawatts of nameplate rated generating capacity from a CS Facility. Customers cannot be subscribed to more than one CS Facility at any time.
8. **Metering.** All Customers must be metered according to the requirements of their OAT.

# **APPENDIX C**

**Budget Forecast for the Disadvantaged Communities Green  
Tariff and Community Solar Green Tariff Programs for the  
Program Years 2021 and 2022**

Proposed by Peninsula Clean Energy Authority





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## 1. PURPOSE

Pursuant to Ordering Paragraph 17 of California Public Utilities Commission (“Commission” or “CPUC”) Decision 18-06-027, *Alternate Decision Adopting Alternatives to Promote Solar Distributed Generation in Disadvantaged Communities*, issued in Rulemaking 14-07-002 on June 22, 2018, and Resolution E-4999, issued on June 3, 2019, Peninsula Clean Energy Authority (“PCE”) hereby submits this budget forecast for its Disadvantaged Communities Green Tariff (“DAC-GT”) and the Community Solar Green Tariff (“CSGT”) programs for Program Years (“PYs”) 2021 and 2022.<sup>1</sup>

PCE requests that budgets proposed herein be approved by the Commission and that the Commission direct Pacific Gas and Electric (“PG&E”) to transfer funds sufficient to meet PCE’s approved annual budgets per the funding mechanisms discussed below.

## 2. BACKGROUND

Per Resolution E-4999, estimated budget forecasts must be presented by program and include the following budget line items:<sup>2</sup>

1. Generation cost delta,<sup>3</sup> if any;
2. 20% bill discount for participating customers (generation portion);
3. Program administration costs, including:
  - a. Program management;
  - b. Information technology (“IT”);
  - c. Billing operations;
  - d. Regulatory compliance; and
  - e. Procurement
4. Marketing, education, and outreach (“ME&O”) costs, including:
  - a. Labor costs;
  - b. Outreach and material costs; and
  - c. Local CBO/sponsor costs for the CSGT program
5. Program Evaluation Costs.

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<sup>1</sup> In future PYs, this annual program budget will also include actual program costs from the previous PY, as well as a reconciliation of forecasted versus actual costs.

<sup>2</sup> A detailed description of each budget line item can be found in PCE’s Implementation Plan, submitted in Appendix A to the Implementation Advice Letter.

<sup>3</sup> Resolution E-4999 establishes that *above market* generation costs should include net renewable resource costs in excess of the otherwise applicable class average generation rate that will be used to calculate the customers’ bills. In conversations with the Commission’s Energy Division after the release of Resolution E-4999, it was clarified that this budget line item is intended to cover both a potential higher, as well as lower, cost of the DAC-GT/CSGT resources than the otherwise applicable class average generation rate. Hence, the term is updated to state the “Delta of generation costs between the DAC-GT/CSGT resources and the otherwise applicable class average generation rate.”

In addition to budget forecasts, annual program budget submissions also include details on program capacity and customer enrollment numbers for both programs. More specifically, PCE will report on:

1. Existing capacity at the close of the previous PY;
2. Forecasted capacity for procurement in the upcoming PY;
3. Customers served at the close of the previous PY; and
4. Forecasted customer enrollment for the upcoming PY.

Finally, Confidential Appendix F contains the following information:

1. Workpaper for the calculation of the generation cost delta; and
2. Workpaper for the calculation of the 20% bill discount to participating customers.

For the reasons set forth in the attached declaration of Joseph Wiedman, these two workpapers are confidential, not included in the public versions of this Advice Letter, and will only be made available to those who execute a nondisclosure agreement. Further information on how to execute a nondisclosure agreement can be found in the cover letter of this Advice Letter.

Supporting worksheets used in substantiating cost estimates, including direct labor, management and/or supervisor costs, and any vendor costs, along with a breakdown of staff or contractor position descriptions, loaded hourly rates, and total hours anticipated for each task, will be provided if available.

### **3. BUDGET FORECAST FOR PY 2021 and 2022**

For PYs 2021-2022, PCE requests a total budget of \$810,558.37 for the DAC-GT and CSGT programs. A detailed budget forecast for each program and PY by budget line item can be found in the figure below.

Figure 1: PCE Budget Forecast for PYs 2021 and 2022

Category	DAC-GT			CSGT		
	2021	2022	Total	2021	2022	Total
Generation Cost Delta	\$ -	\$ 55,857.45	\$ 55,857.45	\$ -	\$ 34,604.54	\$ 34,604.54
20% Bill Discount	\$ -	\$ 5,072.19	\$ 5,072.19	\$ -	\$ 3,139.93	\$ 3,139.93
<b>Program Administration</b>						
Program Management	\$ 61,406.25	\$ 60,468.75	\$ 121,875.00	\$ 61,406.25	\$ 60,468.75	\$ 121,875.00
Information Technology	\$ 13,031.25	\$ 7,927.34	\$ 20,958.59	\$ 13,031.25	\$ 7,927.34	\$ 20,958.59
Billing Operations	\$ 7,591.26	\$ 16,093.47	\$ 23,684.73	\$ 1,939.99	\$ 4,112.78	\$ 6,052.77
Regulatory Compliance	\$ 7,625.00	\$ 16,015.00	\$ 23,640.00	\$ 7,625.00	\$ 16,015.00	\$ 23,640.00
Procurement	\$ 52,175.00	\$ 44,165.00	\$ 96,340.00	\$ 52,175.00	\$ 44,165.00	\$ 96,340.00
<b>Subtotal Program Administration</b>	<b>\$ 141,828.76</b>	<b>\$ 144,669.57</b>	<b>\$ 286,498.33</b>	<b>\$ 136,177.49</b>	<b>\$ 132,688.87</b>	<b>\$ 268,866.36</b>
Marketing, Education & Outreach	\$58,587	\$19,673	\$ 78,259.78	\$58,587	\$19,673	\$ 78,259.78
EM&V	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

<b>Total</b>	\$ 200,415.45	\$ 225,272.31	\$ 425,687.75	\$ 194,764.18	\$ 190,106.44	\$ 384,870.61	\$ 810,558.37
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PCE provides the following clarifying notes regarding the budget summary.

### **Generation Cost Delta**

PCE does not anticipate having new DAC-GT or CSGT projects come online in 2021 since it first needs to solicit such projects. Hence, the generation cost delta budget forecast for the DAC-GT and CSGT programs is based on the cost of a generic project that is sized to match the program criteria. More detail is provided in the Implementation Plan in Appendix A to the Implementation Advice Letter.

### **20% Bill Discount**

As described in more detail in PCE's Implementation Plan, PCE proposes to only calculate the 20% discount for the generation portion of the electric bill. The respective utility (in PCE's case, PG&E) will be responsible for calculating the 20% discount on the delivery portion of the bill for Community Choice Aggregator ("CCA") program participants. Hence, the budget forecasted for providing the bill discount to customers for the DAC-GT and CSGT programs is based on the revenue loss experienced by providing a 20% discount on the generation portion of the electric bill, not the full electric bill. As mentioned, PCE does not expect to enroll customers in the DAC-GT or CSGT program in PY 2021 as new solar resources will need to be procured for these programs.

### **Program Administration Costs**

Program management includes program development and management, budgeting, and reporting. IT costs include the cost to develop program tools and update existing systems to accommodate program enrollment and billing. Billing operations covers costs for ongoing billing operations and customer support once all systems are developed. Regulatory Compliance covers costs for regulatory compliance and related program filings with the Commission. Procurement covers the costs to develop and manage solicitations for solar resources under the program, as well as annual renewable energy credit retirement and compliance functions.

### **Marketing, Education, and Outreach**

ME&O budgets are split into three categories – (1) PCE labor costs; (2) PCE direct costs for the outreach and materials; and (3) funds provided to the local CBOs who function as the sponsor for the CSGT program.

### **Evaluation, Measurement and Verification**

PCE proposes commencing independent evaluation for the CCA DAC-GT program at the beginning of the upcoming PY after customers have been enrolled under the program for a minimum of one full year. Hence, PCE does not include any budget

forecast for evaluation, measurement and verification in the budget for PYs 2021 and 2022.

#### 4. BUDGET CAPS

Resolution E-4999 establishes a budget cap of 10% of the total budget for program administration costs and a budget cap of 4% of the total budget for ME&O costs.<sup>4</sup> However, administrative and ME&O costs may be higher than these budget allocations in the first two years of program implementation (i.e., PYs 2021 and 2022 for PCE), acknowledging that program start-up costs may be higher. Hence, PCE will include information on budget caps in subsequent submissions of the Annual Budget Advice Letter.

#### 5. PROGRAM CAPACITY AND ENROLLMENT NUMBERS

PCE reports forecasted program capacity and customer enrollment numbers for PYs 2021 and 2022 in the figure below. PCE is unable to report on existing program capacity and customer enrollment numbers to date as the programs have not launched yet.

PCE is reporting estimated program capacity and enrollment numbers for the DAC-GT and CSGT programs.

Figure 2: Program Capacity and Enrollment Count for DAC-GT

Category	DAC-GT		
	2021	2022	Total
Estimated capacity to be procured (MW)	N/A	1.236	1.236
Estimated customer enrollment (#)	N/A	383	383

Category	CSGT		
	2021	2022	Total
Estimated capacity to be procured (MW)	N/A	0.0425	0.0425
Estimated customer enrollment (#)	N/A	125	125

#### 6. COST RECOVERY AND FUND TRANSFER PROCEDURES

Once the Commission approves PCE’s budget request, PG&E will be responsible for including the total budget request for PCE’s DAC-GT and CSGT programs in its next Energy Resource Recovery Account (“ERRA”) Forecast application. Once PG&E receives approval of its ERRA Forecast from the Commission, PG&E is advised to set

<sup>4</sup> Resolution E-4999 determined that Program Administrators can submit a Tier 3 Advice Letter requesting an adjustment to the budget allocations if the need arises. See Resolution E-4999 at 27.

aside the requested PCE budget in a sub-account of its DAC-GT and CSGT balancing accounts. PG&E will then transfer program funds to PCE in either an annual-basis disbursement for the upcoming PY, or in four quarterly installments (by January 1, April 1, July 1, and October 1 of each year) for the upcoming quarter.

For 2021 program funds, PG&E must transfer all past due funds within 30 days of approval of the 2022 ERRA Forecast filing.

## **7. CONCLUSION**

PCE respectfully requests the Commission approve the budgets proposed herein and direct PG&E to transfer funds sufficient to meet PCE's approved annual budgets per the funding mechanisms discussed above.

# **APPENDIX D**



**Marketing Education and Outreach Plan for the Disadvantaged  
Communities Green Tariff and Community Solar Green Tariff  
Programs for Program Years 2021 and 2022**

Proposed by Peninsula Clean Energy Authority



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## **A. Purpose and Goals**

Peninsula Clean Energy Authority (PCE) will develop and implement a targeted customer marketing, education, and outreach (ME&O) campaign to ensure potential customers in disadvantaged communities (DACs) are aware of the opportunity to benefit from the Disadvantaged Communities Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT) programs. PCE's ME&O strategy has four main goals:

1. Enroll eligible customers in the DAC-GT and CSGT programs;
2. Increase awareness of and enrollment in CARE and FERA discount programs;
3. Increase customer awareness of energy use, savings, and other customer incentives, rate options (i.e., time-of-use), discounts, or programs; and
4. Conduct research, as needed, on barriers to participation and ensure outreach to DAC and hard-to-reach customers is accessible and equitable.

Throughout this process, PCE aims to achieve meaningful and diverse customer engagement through a culturally-competent, multilingual approach. To achieve these goals, PCE will develop a targeted customer engagement campaign that leverages community-based marketing best practices such as:

- A mix of multilingual and culturally-competent communications including community advertising (e.g., banners, newsprint), geo-targeted digital ads, and direct mail; and
- Direct customer outreach and partnerships with community-based organizations (CBOs), and local government agencies.

Ultimately, PCE will measure program success by the number of customers enrolled in the DAC-GT and CSGT programs. We will also measure program success by the overall number of customers reached, and the diversity of customers reached.

The following subsections provide additional details about PCE's ME&O approach for the DAC-GT and CSGT programs.

## **B. Guiding Principles**

PCE is committed to developing diverse and culturally appropriate communication strategies to ensure that stakeholders can participate in decisions and actions that impact their communities. As such, PCE commits to the following guiding principles throughout the ME&O engagement process for the DAC-GT and CSGT programs. PCE aims to:

- Achieve diverse and meaningful engagement that reflects the demographics of DACs to ensure equitable outreach across race, income and age barriers;
- Maintain transparency and accessibility of information by bringing the information directly to customers in their neighborhood, in their community, or interest space to better engage them in the process; and

- Build a collaborative process with community partners to ensure barriers and benefits to participation are considered in ME&O activities to the maximum extent possible.

**C. Target Audience**

Given enrollment specifications around the programs, the primary target audience for the ME&O strategy are customers living in DACs per CalEnviroScreen. In PCE’s service area, this includes customers in the following neighborhoods<sup>1</sup>:

Figure 1: Qualifying Neighborhoods in PCE Service Territory

<b>Census Tract</b>	<b>Nearby City (to approximate location only)</b>	<b>Zip</b>	<b>California County</b>
6081602100	South San Francisco	94080	San Mateo
6081602300	South San Francisco	94080	San Mateo
6081604200	San Bruno	94066	San Mateo
6081612000	East Palo Alto	94303	San Mateo
6081610201	Redwood City	94063	San Mateo
6081611900	East Palo Alto	94303	San Mateo

**D. ME&O Tactics and Strategies**

**1. Communications and Media Content**

A variety of communications and media content will be necessary to promote the programs. This material will be translated and improved throughout the ME&O strategy via message testing to ensure it is culturally competent and effective. Additionally, PCE

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<sup>1</sup> Source: SB535 Disadvantaged Communities using CalEnviroScreen 3.0, June 2018 Update (available at <https://oehha.maps.arcgis.com/apps/View/index.html?appid=c3e4e4e1d115468390cf61d9db83efc4>).

will run a number of print and digital advertisements in multiple languages to encourage program enrollment. Direct mailing, social media outreach and email blasts will also be utilized to target customers.

## **2. Community Outreach**

To meet our ME&O goals, PCE will develop an outreach and engagement strategy leveraging the key tactics summarized below. The ME&O strategy will include a multilingual and culturally competent approach to engagement and consider the specific needs of DACs in PCE's service area.

Grassroots Outreach: PCE will conduct grassroots outreach to engage directly with community members at community events. PCE already regularly attends and sponsors many community events throughout its service area, including neighborhood festivals, farmers markets, holiday celebrations, and special events. Despite the lack of such opportunities currently due to local health directives, it is expected that these events will again become available during the implementation timeframe. During the ME&O process for the DAC-GT and CSGT programs, PCE will focus on expanding the breadth of events attended in DAC neighborhoods. PCE will utilize the expertise of CBO partners to identify impactful events. Outreach will be informed by data (census tracks, 4013, etc.) in order to identify customers who are most likely to enroll in the programs.

Partnerships with Community-Based Organizations: Partnering with CBOs is a critical facet of PCE's ME&O plan. CBOs have intimate knowledge of the local communities they serve and will serve as valuable resources for how best to conduct outreach that makes sense for members of their communities. As PCE engages with CBO partners, we seek to establish open dialogue, build awareness and understanding among community members, identify community-specific issues, and develop methods for disseminating relevant information.

Specifically, PCE will provide funding for CBOs to conduct outreach around the DAC-GT and CSGT programs, CARE and FERA enrollment, and other energy efficiency programs. CBOs will help coordinate program-specific workshops to disseminate program information to their constituencies. As community events and workshops are held, we will closely track the diversity in race, age and income of participants, to ensure that participation reflects census distribution demographics of the DACs. Additionally, we will maximize convenience of meetings and events to public transportation, and ensure events are accessible in accordance with the Americans with Disabilities Act.

Additionally, many other local City departments already conduct outreach in the same communities that we will conduct program outreach. There may be an opportunity to partner and include DAC-GT and CSGT program information in their ongoing efforts. PCE will investigate and pursue opportunities to collaborate.

Similarly, if other Community Choice Aggregators (CCAs) have launched their DAC-GT programs prior to PCE, PCE will connect with those CCAs to obtain ME&O lessons learned.

### 3. Program Leveraging

California offers a plethora of clean energy, energy efficiency, and storage incentives, with several of them targeting income-qualified customers or customers in DACs. Complementing the State’s programs, PCE also has developed a wide range of in-house program offerings with many of them focusing on low-income customers or disadvantaged communities. PCE’s community outreach grants fund local nonprofits that are deeply engaged in our communities to communicate our program offerings directly to their clients and constituents. These organizations support residents in understanding which PCE programs residents are eligible for and helping them enroll. Through our outreach grant relationships we provide program information in Spanish, Mandarin, Cantonese, and English.

Under the DAC-GT/CSGT ME&O plan, PCE will leverage its relationships and interactions with customers through existing programs to inform, educate and encourage program participation. For example, PCE will leverage the following programs for joint outreach efforts:

- PCE’s Community Outreach Grant program that supports customer education about utility discount programs as well as PCE programs for hard-to-reach communities in multiple languages;
- PCE’s Low-Income Home Upgrade program that leverages and supplements existing home upgrade programs by funding gaps such as roof repairs; and
- PCE’s Low-Income EV discount program that assists low-income families in buying used electric vehicles through a loan and financial education program coupled with rebates.

Figure 2: PCE ME&O Tactics and Strategies

<p><b>Grassroots Outreach</b></p> <ul style="list-style-type: none"> <li>• Community Events and Workshops</li> <li>• Community Leaders</li> </ul>	<p><b>Partnerships with Community Organizations</b></p> <ul style="list-style-type: none"> <li>• Direct Outreach</li> <li>• Presentations</li> <li>• Enrollment Assistance</li> </ul>
<p><b>Communications and Media Content</b></p> <ul style="list-style-type: none"> <li>• Digital Ads</li> <li>• Social Media Content</li> <li>• Flyers</li> </ul>	<p><b>Customer Identification and Messaging</b></p> <ul style="list-style-type: none"> <li>• A/B Message Testing</li> <li>• Census Tract Information</li> <li>• Outreach Tracking</li> </ul>

<ul style="list-style-type: none"> <li>• Signage</li> <li>• Website</li> <li>• Emails</li> <li>• Direct Mail</li> </ul>	<ul style="list-style-type: none"> <li>• Culturally Competent Messaging and Translations</li> </ul>
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#### **4. Metrics Tracking**

Because PCE is using multiple tactics for ME&O, a variety of metrics will be used to evaluate the effectiveness of each effort. Our primary measure of effectiveness is the number of customers reached, which can be measured by:

- Total number of enrollees in both the DAC-GT and CSGT programs;
- Total CARE and FERA enrollment;
- Total number of customers reached;
- Diversity in race, age and income of event participants, with participation that reflects census distribution demographics of the DACs;
- Direct mail and email - Email click-through and open rates;
- Indirect - Website visits and page views, social media engagement and impressions; and
- Total number of events and distribution of events by neighborhood.

PCE will track these engagement metrics along with overall program enrollment metrics. By regularly monitoring these measures, PCE will be able to make changes in its approach or shift the mix of ME&O channels to improve the effectiveness of outreach, if necessary. Additionally, feedback from CBO partners, and interactions with members of the community along with message testing could alter the strategy pursued.

# **APPENDIX E**





December 2, 2020

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

**RE: CCA Capacity Transfer under the Disadvantaged Community Green Tariff and Community Solar Green Tariff Programs**

Resolution E-4999 allows Community Choice Aggregators (“CCAs”) that serve customers in the same investor-owned utility (“IOU”) service territory to share and/or trade program capacity.<sup>1</sup> The resolution also stipulates that if a CCA elects to trade or share capacity, the trade must be affirmed in writing by all CCAs whose program capacity is implicated in the proposal. This letter affirms the trading of capacity between CCAs under the Disadvantaged Community Green Tariff (“DAC-GT”) and the Community Solar Green Tariff (“CS-GT”) programs as authorized under Resolution E-4999. As confirmed in an email with Energy Division staff on November 25, 2020, this letter is being submitted as an alternative to, and in lieu of, the CCAs implicated by this proposal submitting separate written comments in response to the CCAs’ advice letters.

Some CCAs in PG&E’s service territory have elected to not pursue one or both of the DAC-GT and CS-GT programs and to forego their capacity allocations per Resolution E-4999. These non-participating CCAs have elected to transfer their allocations to the participating CCAs in PG&E’s service territory. The CCA’s involved, both participating and non-participating, have agreed to distribute the transferred capacity in equal parts among the participating CCAs and are confirming such transfer in this letter.

**Capacity Transfer under the DAC-GT Program**

Sonoma Clean Power (“SCP”), Central Coast Community Energy (“3CE”), formerly known as Monterey Bay Community Power, and Silicon Valley Clean Energy Authority (“SVCE”) have determined to not implement the DAC-GT program and to trade their program capacity to the participating CCAs in equal parts.<sup>2</sup> The CCAs that will implement the DAC-GT program include East Bay Community Energy (“EBCE”), CleanPowerSF, Marin Clean Energy (“MCE”), Peninsula Clean Energy Authority (“PCE”) and City of San José, in its capacity as administrator of San Jose Clean Energy (“SJCE”). The following table shows the assigned program capacity for

<sup>1</sup> Resolution E-4999 at 16 and 54 (Findings and Conclusions 17).

<sup>2</sup> Valley Clean Energy Authority has also chosen to not implement the DAC-GT program but was not included in the capacity transfer process due to its negligible program capacity allocation.



each of the non-participating CCAs per table 1 in Resolution E-4999,<sup>3</sup> as well as the capacity being transferred to each participating CCA.

Transferring CCA	Capacity being Transferred (MW)	Receiving CCAs				
		EBCE	CleanPowerSF	MCE	PCE	SJCE
SVCE	0.5	0.100	0.100	0.100	0.100	0.100
SCP	0.5	0.100	0.100	0.100	0.100	0.100
3CE	0.68	0.136	0.136	0.136	0.136	0.136
<b>TOTAL</b>	<b>1.68</b>	<b>0.336</b>	<b>0.336</b>	<b>0.336</b>	<b>0.336</b>	<b>0.336</b>

#### Capacity Transfer under the CS-GT Program

SCP, 3CE, SVCE, and SJCE have determined to not implement the CS-GT program and to trade their program capacity to the participating CCAs in equal parts. The CCAs that will implement the CS-GT program include EBCE, CleanPowerSF, MCE, and PCE. The following table shows the assigned program capacity for each of the non-participating CCAs per table 1 in Resolution E-4999,<sup>4</sup> as well as the capacity being transferred to each participating CCA.

Transferring CCA	Capacity being Transferred (MW)	Receiving CCA			
		EBCE	CleanPowerSF	MCE	PCE
SJCE	0.36	0.0900	0.0900	0.0900	0.0900
SVCE	0.09	0.0225	0.0225	0.0225	0.0225
SCP	0.06	0.0150	0.0150	0.0150	0.0150
3CE	0.18	0.0450	0.0450	0.0450	0.0450
<b>TOTAL</b>	<b>0.69</b>	<b>0.1725</b>	<b>0.1725</b>	<b>0.1725</b>	<b>0.1725</b>

All of the undersigned CCAs affirm the capacity transfers under the DAC-GT and CS-GT programs as described above.

Sincerely,

<sup>3</sup> Resolution E-4999 at 14

<sup>4</sup> Id.



*Shalini Swaroop*  
/s/ Shalini Swaroop (Dec 15, 2020 15:24 PST)

Shalini Swaroop  
General Counsel & Director of Policy  
Marin Clean Energy

*Michael A. Hyams*  
/s/ Michael A. Hyams (Dec 15, 2020 15:36 PST)

Michael Hyams  
Deputy Manager, CleanPowerSF  
San Francisco Public Utilities Commission

*JP Ross*  
/s/ JP Ross (Dec 15, 2020 22:04 PST)

JP Ross  
Senior Director, Local Development,  
Electrification and Innovation  
East Bay Community Energy

*[Signature]*  
/s/

Leland Wilcox  
Chief of Staff, Office of the City Manager  
City of San José - San José Clean Energy

*Neal Reardon*  
/s/ Neal Reardon (Dec 16, 2020 07:50 PST)

Neal Reardon  
Director, Regulatory Affairs  
Sonoma Clean Power Authority

*Poonum Agrawal*  
/s/ Poonum Agrawal (Dec 16, 2020 08:31 PST)

Poonum Agrawal  
Senior Regulatory Analyst  
Silicon Valley Clean Energy Authority

*[Signature]*  
/s/ Joseph Wiedman (Dec 16, 2020 11:23 PST)

Joseph Wiedman  
Director of Legislative and Regulatory Affairs  
Peninsula Clean Energy Authority

*Stephen Keehn*  
/s/ Stephen Keehn (Dec 16, 2020 12:13 PST)

Stephen Keehn  
Int. Director, Regulatory Affairs  
Central Coast Community Energy

cc: Service List: R.14-07-002

# APPENDIX F