



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Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: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 proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

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

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

Name:
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	



February 1, 2022

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

PCE Advice Letter 24-E

RE: PENINSULA CLEAN ENERGY AUTHORITY 2023 BUDGET REQUEST AND OUTREACH PLAN FOR THE DISADVANTAGED COMMUNITIES GREEN TARIFF AND COMMUNITY SOLAR GREEN TARIFF PROGRAMS, AND CONFIRMATION OF AUTOMATIC ENROLLMENT

PURPOSE

Peninsula Clean Energy Authority (“PCE”) hereby submits to the California Public Utilities Commission (“Commission” or “CPUC”) this advice letter (“AL”) for approval of its program budget estimates and marketing, education, and outreach (“ME&O”) plan for PCE’s 2023 Disadvantaged Communities Green Tariff (“DAC-GT”) and Community Solar Green Tariff (“CSGT”) programs. In addition, PCE confirms that it will be employing automatic enrollment for eligible customers under its DAC-GT program, as further described below.

TIER DESIGNATION

Pursuant to General Order (“GO”) 96-B, Energy Industry Rule 5.2, and Ordering Paragraph (“OP”) 2 of Resolution E-5125, this AL is submitted with a Tier 2 designation.

EFFECTIVE DATE

Pursuant to GO 96-B and General Rule 7.3.4, PCE requests that this Tier 2 AL become effective 30 days following submittal, which is March 3, 2022.

BACKGROUND

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

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

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

On June 14, 2021, PCE submitted AL 14-E, *Peninsula Clean Energy Authority’s Disadvantaged Communities Green Tariff Program and Community Solar Green Tariff Program Revised Budget Estimates for Program Years 2021 and 2022*, providing budget updates requested in Resolution E-5124, including the “CCA integration” costs, defined as “administrative, IT, or other discrete activities taken by PG&E in order to facilitate implementation of the DAC-GT and CSGT CCA programs.”⁶ AL 14-E was approved on July 21, 2021. On August 31, 2021, PCE submitted jointly with PG&E AL 15-E, *Proposed Capacity Transfer Under the Disadvantaged Communities Green Tariff Program to Accommodate Service to The City of Los Banos*, which included the most recent budget forecast update to accommodate DAC-GT program capacity expansion for PCE to serve the City of Los Banos. The Energy Division approved AL 15-E on September 30, 2021.

On November 2, 2021, PCE submitted AL 17-E, *Peninsula Clean Energy Authority Revised Budget Request For The Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs For Program Years 2021 and 2022*. PCE’s revised budget forecast incorporated CCA integration costs which had not been captured in the prior budget due to a formula error.

¹ DACs are defined under D.18-06-027 as communities that are identified in the CalEnviroScreen 3.0 as among the top 25 percent of census tracts statewide, plus the census tracts in the highest five percent of CalEnviroScreen’s Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data. Resolution E-4999 clarified that Program Administrators must submit a Tier 1 AL to update program eligibility rules within 30 days of a new release of the CalEnviroScreen tool. PCE satisfied this requirement by submitting PCE AL 18-E on November 12, 2021, reflecting the release of CalEnviroScreen 4.0.

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

³ D.18-06-027 at 104 (OP 17).

⁴ *Id.*

⁵ Resolution E-5124 at 32 (OP 1).

⁶ Resolution E-5124 at 11.

PROGRAM YEAR 2023 BUDGET

PCE hereby submits its budget request for program year (“PY”) 2023 for the DAC-GT and CSGT programs. Per Resolution E-4999, the budget request covers the budget reconciliation for the previous PY (i.e., PY 2021) and the budget forecast for the upcoming PY (i.e., PY 2023). PCE requests a total budget of \$671,036.90 for the DAC-GT and CSGT programs for PY 2023. Additional details can be found in Appendix A.

As further described in Appendix A, PCE is requesting an adjustment to the CSGT Program Administration and ME&O caps for PY 2023, PCE’s third program year. Resolution E-4999 established 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, these caps taking effect after the first two program years, while also describing a process that Program Administrators could follow to propose an adjustment.⁷ Resolution E-5125 provided further direction, stating that Program Administrators can request an adjustment to the budget caps through their Tier 2 Annual Budget AL.⁸ PCE forecasts that the soonest any new permanent CSGT resources will come online is 2024. Because the CSGT program cannot utilize interim resources, the timing of the rollout for resources will result in no Generation Cost Delta or Bill Discount costs, as defined in Appendix A, for CSGT PY 2023.⁹ Consequently, PCE’s expenditures on Program Administration and ME&O make up the entirety of the CSGT forecasted budget for 2023. Therefore, PCE is requesting an adjustment to the 2023 Program Administration and ME&O caps for the CSGT Program. The table below represents the forecasted DAC-GT and CSGT PY 2023 Program Administration and ME&O costs as a percent of the total forecasted budget.

		% of Total 2023 PY Budget	
		DAC-GT	CSGT
Program Administration	Max 10% of total budget after start-up years	6%	52%
ME&O	Max 4% of total budget after start-up years	1%	48%

ME&O PLAN FOR PY 2023

In addition to the budget request, PCE submits its ME&O plan for PY 2023 as Appendix B. Per Resolution E-5124, and as originally contemplated in PCE’s Implementation AL, PCE confirms that

⁷ See Resolution E-4999 at 67 (OP 2) (noting that Program Administrators can submit a Tier 3 AL requesting an adjustment to the budget allocations if the need arises).

⁸ Resolution E-5125 at 11, OP 2.

⁹ In addition, these budget categories will likely only amount to partial costs of PCE’s total program budget for CSGT PY 2024.

it will be employing automatic enrollment for its DAC-GT program for PY 2023.¹⁰ As also described in the ME&O Plan, PCE will employ a three-tier process to automatically enroll eligible customers. First, PCE will identify customers that are currently participating in the Arrearage Management Program (“AMP”) with service addresses in a PCE DAC and meet all other DAC-GT eligibility criteria. Second, PCE will identify customers that are currently eligible for the AMP but are not participating and with service addresses in a PCE DAC, and meet all other DAC-GT eligibility criteria. Third, PCE will identify all remaining DAC-GT eligible PCE customers and use a random selection protocol to enroll customers into the DAC-GT program. When program capacity becomes available in the future due to unenrollment or other reasons, PCE will perform the same three-tiered process to ensure that new AMP enrollees, newly AMP-eligible customers, and new residential PCE customers that meet the other DAC-GT eligibility criteria will be considered in the automatic enrollment selection process.

APPENDICES

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

1. Appendix A: Disadvantaged Communities Green Tariff Program and Community Solar Green Tariff Program Budget Forecast for Program Year 2023;
2. Appendix B: Projected Marketing Education and Outreach Plan for the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs for Program Year 2023; and
3. Confidential Appendix C: Workpapers supporting the calculation of the generation cost delta and the 20% bill discount.

REQUEST FOR CONFIDENTIAL TREATMENT

In support of this AL, PCE provides certain confidential information that is contained in Confidential Appendix C, 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 Jeremy Waen at jwaen@peninsulacleanenergy.com.

CONCLUSION

PCE respectfully requests that the Commission approve PCE’s PY 2023 budget forecast and ME&O plan proposed herein.

¹⁰ See Resolution E-5124 at 31 (OP 25), “It is reasonable for participating CCAs to automatically enroll eligible DAC-GT customers as long as their enrollment criteria are in alignment with the spirit of D.20-07-008 and target customers at high risk of disconnection.” See also PCE AL 11-E, Appendix A, at 6.

NOTICE

A copy of this AL is being served on the consolidated, official Commission service list for Rulemaking (“R.”) 14-07-002 and Application (“A.”) 16-07-015. For changes to this service list, please contact the Commission’s Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Pursuant to the March 20, 2020 order from the Commission’s Executive Director waiving the hard copy filing requirements for the AL pursuant to GO 96-B Rule 1.3, the Joint CCAs will not be filing a hard copy of this AL.

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 and jwaen@peninsulacleanenergy.com.*****

Anyone wishing to protest this AL 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. Protests should be mailed to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Copies of the protest should also be mailed to the attention of the 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:

Jeremy Waen
Director of Regulatory Policy
Peninsula Clean Energy Authority
2075 Woodside Road
Redwood City, CA 94061
Email: jwaen@peninsulacleanenergy.com

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

CORRESPONDENCE

For questions regarding this AL, please contact Jeremy Waen by electronic mail at jwaen@peninsulacleanenergy.com.

/s/ Jeremy Waen

Jeremy Waen
Director of Regulatory Policy
Peninsula Clean Energy Authority

cc: Service List: R.14-07-002
Service List: A.16-07-015

Declaration of Jeremy Waen Supporting Confidentiality Claim for Submission of Peninsula Clean Energy Authority Advice Letter 24-E, Peninsula Clean Energy Authority 2023 Budget Request and Outreach Plan for the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs, and Confirmation of Automatic Enrollment

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”) submission, 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 24-E: *Peninsula Clean Energy Authority 2023 Budget Request and Outreach Plan for the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs, and Confirmation of Automatic Enrollment* (“PCE AL 24-E”).

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

1. In my capacity as the Director of Regulatory Policy, 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 24-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 consolidated service list for Rulemaking 14-07-002 and Application 16-07-015 via email:
 - a. “PCE AL 24-E – Public”
 - b. “PCE Confidentiality Declaration”
4. Through this declaration, PCE requests that the “Confidential Appendix C – 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 C contains confidential and highly market-sensitive supporting documentation for PCE AL 24-E.
10. Confidential Appendix C 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:

Jeremy Waen
Director of Regulatory Policy
Peninsula Clean Energy Authority
2075 Woodside Road
Redwood City, California 94061
jwaen@peninsulacleanenergy.com

Executed on February 1, 2022 at Redwood City, California

 /s/ Jeremy Waen

Jeremy Waen
Director of Regulatory Policy
Peninsula Clean Energy Authority

**TABLE OF CONFIDENTIAL INFORMATION
PCE Advice Letter 24-E:**

Peninsula Clean Energy Authority 2023 Budget Request and Outreach Plan for the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs, and Confirmation of Automatic Enrollment

Redaction Reference	Authority For Confidentiality Request	Justification for Confidential Treatment	Length of Time Data To Be Kept Confidential
Confidential Appendix C – Workpapers Supporting the Calculation of the Generation Cost Delta and the 20% Bill Discount	ESP/CCA Matrix, Items II(A), (B) Commission General Order 66-D California Civil Code 3426 California Government Code Sections 6254(k), 6255(a) California Evidence Code 1060	<p>Appendix C 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 C 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>	Under Item II(A), (B), data is confidential for the first 3 years of the forecast period.

APPENDIX A

**Disadvantaged Communities GreenTariff Program and
Community Solar Green Tariff Program Budget Forecast for
Program Year 2023**

Proposed by Peninsula Clean Energy Authority



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1. BACKGROUND

Per Resolution E-4999, estimated budget forecasts must be presented by program and include the following budget line items:¹

1. Generation cost delta,² if any;
2. 20% bill discount for participating customers;
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 Community Based Organization/sponsor costs for the Community Solar Green Tariff (“CSGT”) program
5. Program Evaluation Costs.

In addition to budget forecasts, annual program budget submissions must also include details on program capacity and customer enrollment numbers for both programs. More specifically, Peninsula Clean Energy Authority (“PCE”) must report on:

1. Existing capacity at the close of the previous program year (“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 C 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.

¹ Resolution E-4999 at 67 (Ordering Paragraph (“OP”) 2). A detailed description of each budget line item can be found in PCE’s Implementation Plan, submitted in Appendix A to PCE Advice Letter (“AL”) 11-E submitted on December 22, 2020.

² 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 California Public Utilities Commission’s (“Commission”) 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 Disadvantaged Communities Green Tariff (“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.”

For the reasons set forth in the attached declaration of Jeremy Waen, these two workpapers are confidential, not included in the public versions of this AL, 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 AL.

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.

2. BUDGET FORECAST FOR PY 2023

For PY 2023, PCE forecasts a total budget of \$977,778.36 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.

Table 1: PCE Budget Forecast for PY 2023

Tab	Category	DAC-GT	CSGT
1	Generation Cost Delta	\$ 550,015.39	\$ -
2a/b	20% Bill Discount	\$ 322,317.27	\$ -
	Program Administration		
3a	Program Management	\$ 10,125.00	\$ 1,125.00
3b	Information Technology	\$ 13,230.00	\$ -
3c	Billing Operations	\$ 3,803.34	\$ 971.96
3d	Regulatory Compliance	\$ 8,412.94	\$ 8,412.94
3e	Procurement	\$ 19,906.36	\$ 10,533.75
3b	CCA Integration	\$ 2,430.00	\$ -
	Subtotal Program Administration	\$ 47,107.63	\$ 21,043.65
4	Marketing, Education & Outreach	\$ 7,247.21	\$ 19,247.21
5	EM&V	\$ -	\$ -
	Total	\$ 937,487.50	\$ 40,290.86
			\$ 977,778.36

PCE provides the following clarifying notes regarding the budget summary.

Generation Cost Delta

PCE has identified an interim resource to serve its full DAC-GT program capacity allocation while new projects are being solicited and built. Therefore, the generation cost delta budget forecast for the DAC-GT program is based on the cost of the interim resource selected. PCE does not anticipate having a new CSGT permanent resource online in 2023 and therefore does not forecast a generation cost delta for the CSGT program as it cannot be served with an interim resource.

20% Bill Discount

As described further in PCE AL 14-E and as directed in Resolution E-5124, PCE's 2023 forecasted bill discount costs include both the generation portion of the electric bill as set by PCE as well as the delivery portion of the electric bill as set by Pacific Gas and Electric Company ("PG&E"). PCE only expects to have customers enrolled in the DAC-GT program in PY 2023, and therefore does not include a forecasted bill discount cost for the CSGT program.

Program Administration Costs

Program management costs includes program development and management, budgeting, and reporting. IT costs include the costs to develop program tools and update existing systems to accommodate program enrollment and billing.

As directed in Resolution E-5124, PCE's Program Administration costs also include a separate line item that capture Community Choice Aggregator ("CCA") Integration Costs ("CIAs"), which are forecasted by PG&E and provided to the CCAs for inclusion in their program budgets. These costs reflect the labor and programming work necessary to reflect the bill discount for these programs on the bills of participating customers. PG&E has provided the CCAs with a forecast for the CIAs for 2023 but has indicated that the existing 2022 CIA set asides approved in prior budgets will be sufficient to cover CIA costs in 2023. Therefore, PCE requests that incremental funds not be set aside for these costs, as indicated in Section 6 below.

ME&O

PCE's ME&O budget includes costs associated with PCE labor, direct costs for outreach and materials, and funds provided to the local Community Based Organizations who function as the sponsor for the CSGT program. The PY 2023 DAC-GT budget also includes lower forecasted ME&O costs as PCE will be employing automatic enrollment for this program.

3. BUDGET CAPS

Resolution E-4999 established a budget cap of 10% of the total program budget for Program Administration costs and a budget cap of 4% of the total program budget for ME&O costs.³ However, the Commission recognized that administrative and ME&O costs may be higher than these budget allocations in the early years of program implementation, and allowed administrative costs above the budget caps for the first two program years. For subsequent years, Resolution E-4999 described a process that Program Administrators could follow to propose an adjustment to the spending thresholds.⁴ Resolution E-5125 provided further direction, stating that Program Administrators can request an adjustment to the budget caps through their Tier 2

³ See Resolution E-4999 at 67 (OP 2) (noting that Program Administrators can submit a Tier 3 AL requesting an adjustment to the budget allocations if necessary).

⁴ Resolution E-4999 at 67 (OP 2); Resolution E-5124 at 11.

Annual Budget AL if the need arises.⁵

PCE anticipates that it will exceed the designated budget caps for its CSGT program in 2023. Although PYs 2021 and 2022 are the first two years of PCE’s approved budget to develop and offer these programs, PCE forecasts that the *soonest* any new permanent CSGT resources will come online is 2024. Further, unlike the DAC-GT program, the CSGT program cannot utilize interim resources. Due to the timing of the rollout for CSGT resources, PCE will not incur any Generation Cost Delta or Bill Discount costs for PY 2023.⁶ As such, PCE’s expenditures on Program Administration and ME&O make up the entirety of the CSGT forecasted budget for 2023, and PCE is projected to exceed the CSGT Program Administration and ME&O budget limits. PCE is therefore requesting an adjustment to the PY 2023 Program Administration and ME&O caps for the CSGT program. Table 2 below represents the forecasted DAC-GT and CSGT PY 2023 Program Administration and ME&O costs as a percent of the total forecasted budget.

Table 2: 2023 Program Administration and ME&O Forecasts

		% of Total 2023 PY Budget	
		DAC-GT	CSGT
Program Administration	Max 10% of total budget after start-up years	6%	52%
ME&O	Max 4% of total budget after start-up years	1%	48%

4. BUDGET RECONCILIATION FOR PY 2021

PCE submitted a budget for PY 2021 as an attachment to its Revised Budget Request AL 17-E which was filed with the Commission on November 2, 2021. The table below shows the forecasted costs for 2021 compared to actual costs, resulting in true-ups per line item and per total program budget that will be carried forward to future PYs.

⁵ Resolution E-5125 at 11 (OP 2).

⁶ In addition, these budget categories will likely only amount to partial costs of PCE’s total budget in CSGT PY 2024.

Table 3: Budget Reconciliation for PY 2021

Tab	Category	DAC-GT			CSGT		
		Forecast	Actual	True-up	Forecast	Actual	True-up
1	Generation Cost Delta	\$ -		\$ -			\$ -
2a/b	20% Bill Discount	\$ -		\$ -			\$ -
	Program Administration						
3a	Program Management	\$ 61,406.25	\$ 4,664.06	\$ 56,742.19	\$ 61,406.25	\$ 1,875.00	\$ 59,531.25
3b	Information Technology	\$ 49,731.25	\$ 6,000.00	\$ 43,731.25	\$ 13,581.25	\$ -	\$ 13,581.25
3c	Billing Operations	\$ 7,591.26	\$ 12,621.40	\$ (5,030.14)	\$ 1,939.99	\$ 3,225.47	\$ (1,285.48)
3d	Regulatory Compliance	\$ 7,625.00	\$ 16,534.50	\$ (8,909.50)	\$ 7,625.00	\$ 7,625.00	\$ -
3e	Procurement	\$ 52,175.00	\$ 41,760.55	\$ 10,414.45	\$ 52,175.00	\$ 15,448.05	\$ 36,726.95
3f	CCA Integration	\$ 15,870.00	\$ 15,556.00	\$ 314.00	\$ -	\$ -	\$ -
	Subtotal Program Administration	\$ 194,398.76	\$ 97,136.52	\$ 97,262.24	\$ 136,727.49	\$ 28,173.52	\$ 108,553.97
4	Marketing, Education & Outreach	\$ 58,586.69	\$ 9,339.06	\$ 49,247.63	\$ 58,586.69	\$ 9,339.06	\$ 49,247.63
5	EM&V	\$ -		\$ -			\$ -
Total		\$ 252,985.45	\$ 106,475.58	\$ 146,509.87	\$ 195,314.18	\$ 37,512.58	\$ 157,801.59

5. 2023 BUDGET REQUEST

Based on the budget forecast for PY 2023 presented in Section 3 and the budget reconciliation for PY 2021 presented in Section 5, PCE is requesting a total budget of \$671,036.90 for the DAC-GT and CSGT programs in this AL.

Table 4: Total Budget Request for PY 2023

	DAC-GT	CSGT	Total
Budget Forecast for 2023	\$ 937,487.50	\$ 40,290.86	\$ 977,778.36
Budget Carryover from 2021	\$ 146,509.87	\$ 157,801.59	\$ 304,311.46
CCA Integration Cost 2022 Carryover	\$ 2,430.00		\$ 2,430.00
Total	\$ 788,547.63	\$(117,510.73)	\$ 671,036.90

6. PROGRAM CAPACITY AND ENROLLMENT NUMBERS

PCE reports forecasted program capacity and customer enrollment numbers for PY 2023 in the figure below. PCE is unable to report on existing program capacity and customer enrollment numbers to date as the DAC-GT and CSGT programs have not yet launched.

For PY 2023, PCE is forecasting full capacity procurement and customer enrollment using either the procured interim resource or some combination of interim and new permanent resources. PCE is not forecasting any capacity procurement or customer enrollment in the CSGT program for PY 2023.

Table 5: Program Capacity and Enrollment Count for DAC-GT and CSGT Programs

Category	DAC-GT		CSGT	
	2023 Forecast	Total	2023 Forecast	Total
Estimated capacity to be procured (MW)	2.75	2.75	0	0
Estimated customer enrollment (#)	956	956	0	0

7. CONCLUSION

PCE respectfully requests the Commission approve PCE's PY 2023 budget proposed herein.

APPENDIX B

**Projected Marketing Education and Outreach Plan for the
Disadvantaged Communities Green Tariff and Community
Solar Green Tariff Programs for Program Year 2023**

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 two main goals:

1. Enroll eligible customers in the DAC-GT and CSGT programs; and
2. Increase awareness of and enrollment in California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) discount programs.

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 direct customer outreach and partnerships with community-based organizations (CBOs) based in eligible DAC communities. PCE has well-developed relationships with such CBOs through our community outreach grant program that has funded collaboration with local organizations since 2018. In 2022, this program funded 11 CBOs to conduct multilingual outreach about energy discounts and programs in English, Spanish, and Chinese (Mandarin and Cantonese).

Our outreach will also reflect PCE's service territory expansion to the City of Los Banos in Merced County. We are building relationships with the City's local CBOs who conduct outreach to eligible populations in both English and Spanish.

Ultimately, PCE will measure program success by the number of customers enrolled in the DAC-GT and CSGT programs, as well as in other discount programs such as CARE.

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 that the barriers to and benefits of 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 eligible DACs under CalEnviroScreen 4.0. In PCE’s service area this includes customers in the following neighborhoods¹:

Figure 1: Qualifying Neighborhoods in PCE Service Territory

Census Tract	City for Approx. Location	County
6081602100	South San Francisco	San Mateo
6081602300	South San Francisco	San Mateo
6081604101	San Bruno	San Mateo
6081610201	Redwood City	San Mateo
6081610202	Redwood City	San Mateo
6081606200	San Mateo	San Mateo
6081612000	East Palo Alto	San Mateo
6047002302	Los Banos	Merced
6047002202	Los Banos	Merced
6047002201	Los Banos	Merced

D. ME&O Tactics and Strategies

In 2023, PCE plans to take a two-pronged approach to ME&O for the DAC-GT program, and an intensive outreach approach for the CSGT program.

- **DAC-GT program:** PCE will be employing automatic enrollment in PY 2023 based on California Public Utilities Commission guidance.² PCE will use a three-tier customer identification process to automatically enroll customers until the program is fully

¹ Source: SB535 Disadvantaged Communities using CalEnviroScreen 4.0, October 20, 2021, <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>.

² See Resolution E-5124 at 31 (OP 25), “It is reasonable for participating CCAs to automatically enroll eligible DAC-GT customers as long as their enrollment criteria are in alignment with the spirit of D.20-07-008 and target customers at high risk of disconnection.”

subscribed. First, PCE will identify customers that are currently participating in the Arrearage Management Program (“AMP”) with service addresses in a PCE DAC and meet all other DAC-GT eligibility criteria. Second, PCE will identify customers that are currently eligible for the AMP but are not participating and with service addresses in a PCE DAC and meet all other DAC-GT eligibility criteria. Third, PCE will identify all remaining DAC-GT eligible PCE customers and use a random selection protocol to enroll customers into the DAC-GT program. When program capacity becomes available in the future due to unenrollment or other reasons, PCE will perform the same three-tiered process to ensure that new AMP enrollees, newly AMP-eligible customers, and new residential PCE customers that meet the other DAC-GT eligibility criteria will be considered in the auto-enrollment selection process.

- **CSGT program:** PCE will again partner with our extensive and growing network of local CBOs and other community partners to conduct outreach to residents in eligible census tracts through an active enrollment process as further detailed in this plan.

Both programs will utilize the following tactics and strategies.

1. Communications and Media Content

A variety of communications and media content will be necessary to promote the programs. Direct mailing, social media outreach, and email blasts will be utilized to target customers. Bilingual (English/Spanish) fact sheets and an enrollment letter have been developed for DAC-GT customers, and additional materials will be developed for the CSGT program as it launches.

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 will consider the specific needs of DACs in PCE’s service area.

Partnerships with CBOs: Partnering with CBOs is a critical facet of PCE’s ME&O plan. In San Mateo County outreach for DAC programs needs to be highly targeted to eligible census tracts, while avoiding messaging to non-eligible census tracts to prevent customer confusion. CBOs have intimate knowledge of the local communities they serve and will be valuable resources for how best to conduct outreach that makes sense for these specific neighborhoods. 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. PCE has a strong track record of partnering with local CBOs. In 2022 we launched our fourth annual round of community outreach grants to partner with 11 CBOs, several of which are located directly in our DAC communities and which serve these residents in multiple languages.

Specifically, PCE will provide funding and collateral material for CBOs to conduct outreach around the DAC-GT and CSGT programs, CARE and FERA enrollment, and other energy efficiency programs. CBOs will engage in one-on-one support for customers seeking help with

their utility bills and avoiding the disconnection process. CBOs will also provide outreach at events, workshops, community gathering places, and through social services such as food distribution programs.

As DAC census tracts cover much of the area of the City of Los Banos, we will partner with City staff in addition to local CBOs to leverage their communications channels to reach all local residents about these programs. Many low-income Los Banos residents already come to City Hall in person to pay their water bills, creating an excellent opportunity for City staff to provide one-on-one education about energy bill discounts as well.

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, 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 program implementation timeframe. PCE will utilize the expertise of CBO partners to identify impactful events. Outreach will be informed by data (i.e., census tracts, 4013, etc.) in order to identify customers who are most likely to enroll in the programs.

Additionally, many other social service programs 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 ongoing social service efforts. PCE will investigate and pursue opportunities for collaboration.

3. Program Leveraging

California offers a plethora of clean energy, energy efficiency, and storage incentives, with several of the incentives 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 the programs focusing on low-income customers or DACs. 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 residents 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.

Figure 2: PCE ME&O Tactics and Strategies

<p>Grassroots Outreach</p> <ul style="list-style-type: none"> • Community Events and Workshops • Relationships with Community Leaders 	<p>Partnerships with Community Organizations</p> <ul style="list-style-type: none"> • Outreach Grant Program • Presentations • Enrollment Assistance
<p>Communications and Media Content</p> <ul style="list-style-type: none"> • Social Media Content • Flyers/Fact Sheets • Website • Emails • Direct Mail 	<p>Customer Identification and Messaging</p> <ul style="list-style-type: none"> • Census Tract Information • Outreach Tracking • Culturally Competent Messaging and Translations

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;
- Direct mail and email - Email click-through and open rates, website visits tracked by QR code or shortlink;
- Indirect - Website visits and page views, social media engagement and impressions; and
- Total number of events, distribution of events by neighborhood, and number of personal contacts made.

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 C
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