

**PUBLIC UTILITIES COMMISSION**

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May 11, 2022

Sidney Bob Dietz c/o Megan Lawson  
Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale St., Mail Code B13U  
San Francisco, California 94177  
PGETariffs@pge.com

**Subject: Energy Division Disposition Approving Pacific Gas and Electric (PG&E) Advice Letter 6490-E-A: 2023 Budget Request for the DAC-GT and CSGT Programs**

Dear Mr. Dietz,

This letter approves advice letter (AL) 6490-E-A containing Pacific Gas and Electric's (PG&E's) 2023 Budget Request for the Disadvantaged Community Green Tariff (DAC-GT) and Community Solar Green Tariff (CS-GT) Programs, as filed

CleanPowerSF, East Bay Community Energy (EBCE), Marin Clean Energy (MCE), Peninsula Clean Energy Authority (PCE), and San José Clean Energy (SJCE) (or the Joint CCAs) filed a timely protest on February 22, 2022. PG&E filed a timely reply to the protest on March 1, 2022.

PG&E filed supplemental AL 6490-E-A on April 1, 2022. The Joint CCAs filed a timely protest to PG&E 6490-E-A on April 21, 2022. PG&E filed a timely reply to the protest on April 28, 2022.

Energy Division (ED) finds that PG&E meets the requirements Resolution E-5125 OP 3 by submitting AL 6490-E-A as a Tier 2 AL instead of a Tier 1. ED also finds that PG&E meets the requirements of Resolution E-5124 Ordering Paragraph (OP) 4 by detailing the billing solution it has pursued as well as efforts to eliminate manual data transfers between PG&E and participating CCAs. The remaining issues raised in the Joint CCAs' protest are valid and PG&E's 2023 proposed plan does not fully resolve these concerns. The Joint CCAs and PG&E should propose any remaining changes to the existing process during the forthcoming May 31, 2022 IOU DAC-GT and CSGT Applications and subsequent proceeding.<sup>1</sup> Therefore, PG&E 6490-E-A is approved with an effective date of May 11, 2022.

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<sup>1</sup> D.18-06-027 established that each IOU would file an Application for Review for the DAC-GT and CSGT programs by January 1, 2021. The CPUC Executive Director has since extended the deadline until May 31, 2022 (the 60th day following issuance and service of the Independent Evaluation Final Report). The proceeding(s) that may be initiated by these applications will review program goals, budget, capacity, design, implementation, and consumer protections.

Attachment 1 contains a discussion of the background, protests, replies, and staff's determinations. Please contact Josh Litwin of the Energy Division at [joshua.litwin@cpuc.ca.gov](mailto:joshua.litwin@cpuc.ca.gov) if you have any questions.

Sincerely,

Handwritten signature of Pete Skala in black ink, followed by the word "FOR" in a simple, sans-serif font.

Pete Skala

Interim Deputy Executive Director for Energy and Climate Policy/  
Interim Director, Energy Division/California Public Utilities Commission

cc:

Feby Boediarso, Regulatory Analyst, EBCE

Stephanie Chen, Senior Policy Counsel, MCE

Matthew DS Rutherford, Senior Regulatory Analyst, PCE

Michael Hyams, Director, CleanPowerSF

Kari Smith, Division Manager of Regulatory and Legislative Policy, SJCE

R.14-07-002 Service List

## Attachment 1:

### Staff Review and Disposition

#### Background

On June 3, 2019, the CPUC issued Resolution E-4999, which approved, with modifications, tariffs to implement the Disadvantaged Communities Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT) programs. Resolution E-4999, Ordering Paragraph (OP) 2 directs PG&E to submit an annual program budget estimate and an annual Marketing, Education, and Outreach (ME&O) plan via tier 1 advice letter by February 1<sup>st</sup> of every year, starting in 2020, for the next program year.

Resolution E-5124, issued April 16, 2021, further required that PG&E include information detailing its efforts to eliminate manual data transfers between PG&E and participating Community Choice Aggregators (CCAs) in its 2023 Annual Budget AL (ABAL).<sup>2</sup> Specifically, the Resolution ordered PG&E to:

- 1) convene a billing working group meeting by December 15, 2021 to present its proposal(s) for long-term solutions to eliminate manual data transfers to the Joint CCAs and Energy Division staff,
- 2) include in its ABAL information detailing which billing option has been pursued as a long-term solution and the efforts taken by PG&E to eliminate manual data transfers between PG&E and participating CCAs through IT software updates or other automated processes, and
- 3) base its proposal(s) on the discussion and solutions identified during the billing working group (and in subsequent conversations, if necessary).

Resolution E-5125, issued August 6, 2021, required DAC-GT and CSGT Program Administrators to submit their ABALs as Tier 2 rather than Tier 1 advice letters to allow for additional review and oversight.<sup>3</sup>

On December 15, 2021, PG&E held a DAC Billing Working Group with CleanPowerSF, East Bay Community Energy, Marin Clean Energy, Peninsula Clean Energy Authority, and San José Clean Energy (or Joint CCAs) and their billing vendors. Energy Division staff also attended. The participants discussed how they had begun resolving data transfer and billing automation issues through bi-weekly meetings among staff. PG&E had also developed an automated customer billing report or file to be delivered to the CCAs on a more regular schedule.

However, despite the progress achieved through the bi-weekly staff meetings between the parties, there are still many outstanding challenges regarding data duplication, consistency and timing, and formatting among other issues. While no resolution was reached during the meeting, the parties had

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<sup>2</sup> Resolution E-5124, pg. 13, COL 18 and OP 4.

<sup>3</sup> Resolution E-5125, pg. 10-11, COL 14 and OP 3.

the opportunity to continue their informal working group discussions or resolve any disagreements through the formal AL process. PG&E held additional follow-up meetings with participating CCAs and ED staff on February 7, 2022 and April 13, 2022 to further discuss billing in whole or in part.

On February 1, 2022, PG&E submitted AL 6490-E seeking approval of its 2023 DAC-GT and CSGT ABAL. The Joint CCAs filed a timely protest on February 22, 2022. PG&E filed a timely reply to the protest on March 1, 2022.

On April 1, 2022, PG&E filed supplemental AL 6490-E-A replacing AL 6490-E in its entirety. The Joint CCAs filed a timely protest to PG&E 6490-E-A on April 21, 2022. PG&E filed a timely reply to the protest on April 28, 2022.

### **Protests and Reply**

CleanPowerSF, East Bay Community Energy, Marin Clean Energy, Peninsula Clean Energy Authority, and San José Clean Energy (or Joint CCAs) filed a timely protest on February 22, 2022.

The Joint CCAs' protest argued that PG&E improperly filed its ABAL as a Tier 1 rather than a Tier 2 as required by Resolution E-5125 Ordering Paragraph (OP) 3. They request that PG&E refile its advice letter as a Tier 2 to ensure that its Program Year (PY) 2023 budget estimates are subject to the same review process as the budgets of other Program Administrators (including CCA administrators).

The protest also argues that PG&E did not provide a long-term billing solution in its February ABAL, which is inconsistent with Resolution E-5124 OP 4. The Joint CCAs go on to detail a set of issues and solutions which they discussed with PG&E during the DAC-GT and CSGT billing working group meeting held in December 2021. The list outlines remaining challenges faced by the CCAs related to data duplication, consistency and timing, formatting, and eligibility checks. The Joint CCAs requested that the Commission direct PG&E to file an amended advice letter that includes this missing information.

PG&E filed a timely reply to the protest on March 1, 2022. In its reply to the Joint CCAs, PG&E agreed to submit a supplemental AL with the correct Tier to address the deficiencies noted in the protest. Specifically, PG&E stated that this supplemental AL would allow for greater review and oversight of its estimated annual budget as well as include additional information on billing and data transfer efforts between PG&E and the participating CCAs.

### **Supplemental AL**

On April 1, 2022, PG&E filed supplemental AL 6490-E-A replacing AL 6490-E in its entirety. The Tier 2 supplemental AL updated PG&E's 2023 DAC-GT and CSGT budget request and addressed the joint CCAs' protest. While PG&E does not directly respond to the CCAs' detailed list of remaining billing and data transfer issues, it does refer to the current "semi-autonomous" data transfer and billing system developed through a collaborative process between itself and

participating CCAs. Noting limitations outlined below, PG&E acknowledges that despite having some newly automated elements, customers must be manually added and removed from the customized DAC-GT billing report.

PG&E notes that it is currently unable to implement a fully automated DAC-GT and CSGT billing process at this time due to other billing system upgrades currently underway.<sup>4</sup> PG&E cannot simultaneously update its DAC-GT and CSGT billing processes until the larger billing system update is completed. However, PG&E states that it will continue to collaborate with the Joint CCAs to discuss improvements to the current process. PG&E did not request that CCAs set aside additional funds for investments in its billing and data system for PY 2023, as it estimates that unspent funds from 2022 CCA allocations are sufficient to fund PY 2023 improvements. Under Resolution E-5124, each CCA is responsible for forecasting, reporting and tracking their share of these CCA integration costs.<sup>5</sup>

### **Protest to Supplemental AL and Reply**

The Joint CCAs filed a timely protest to PG&E 6490-E-A on April 21, 2022. The Joint CCAs argue that PG&E's supplemental AL 1) does not address how PG&E is concretely moving forward to eliminate manual data transfers and 2) does not provide a detailed enough timeline for Program Administrators to properly plan for the duration of the DAC-GT and CSGT programs.

The Joint CCAs argue that PG&E did not respond to the specific challenges and proposed automated solutions they presented in their original protest regarding timing, content, and quality of the billing data. They emphasize that PG&E did not provide any response to how these issues will be addressed and contend that PG&E must identify actionable steps to eliminate manual data transfers in a more definitive and timely manner.

The Joint CCAs also argue that PG&E's "2023" timeline provided in its supplemental AL<sup>6</sup> is vague. They request to know when and how PG&E's proposed cost-benefit analysis of a complete billing solution will be conducted and whether CCA program administrative costs will be included, as this will impact the CCAs' administrative cost caps submitted as part of their ABALs. Finally, the Joint CCAs oppose continued delay of an automated billing solution and emphasize that the current

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<sup>4</sup> PG&E describes its planned Billing System Modernization project in the following regulatory documents: Decision 22-04-004 Authorizing PG&E Medical Discount for Non-Tiered Rates, pp. 12-13, issued April 11, 2022; 2023 GRC Phase 1, Exhibit 6, Chapter 10, Customer Care Technology Projects, pp. 10-9 to 10-20, November 5, 2021, published November 8, 2021; PG&E's Request for An Extension of Time to Comply with Ordering Paragraph 2 of Decision 20-03-019, Power Charge Indifference Adjustment (PCIA) Rulemaking 17-06-026, Pursuant to Rule 16.6, October 19, 2021, approved Nov 2, 2021; PG&E's GRC 2 RTP Track Rebuttal Testimony, July 30, 2021, pp. 1-10 to 1-11.

<sup>5</sup> CCA integration costs are those costs defined as administrative, IT, or other discrete activities taken by PG&E in order to facilitate implementation of DAC-GT and CSGT CCA programs.

<sup>6</sup> PG&E AL 6490-E-A p. 4 states "In 2023, PG&E will evaluate the costs and benefits of a complete billing solution, including an analysis of the costs and benefits of the current system as compared to a fully automated solution."

process is unsustainable and risks billing and enrollment errors. They request that the Commission require that PG&E provide an expedited timeline for implementing an automated data transfer process.

PG&E filed a timely reply to the protest on April 28, 2022. In its reply to the Joint CCAs, PG&E more fully summarizes how it has addressed each aspect of Resolution E-5124 OP 4 (the type of long-term billing solution pursued and efforts to eliminate manual data transfers) and notes that it is open to considering additional automation once the CCAs' programs have all reached a steady state and PG&E's global billing system work is complete.

In meeting the requirements of Resolution E-5125 OP 4, PG&E notes that it has held three billing-related meetings with participating CCAs and ED staff since December 2021. PG&E further elaborates that it has created an automated daily customer billing data report that is uploaded to a secure data transfer site for the participating CCAs to calculate participants' bills. PG&E states that it has worked with the CCAs to ensure that the cadence and content of this information meets their needs; the remaining manual process includes either removing or adding customers on a bi-weekly basis. PG&E emphasizes that any manual steps beyond this process<sup>7</sup> are the responsibility of the CCAs under the current "Bill Ready" construct.<sup>8</sup>

Lastly, PG&E responds to the challenges raised by the Joint CCAs in their original protest regarding timing, content, and quality of billing data. Regarding timing, PG&E argues that it is not worth the time and effort to improve the efficiency of CCA programs given that 1) the CCAs programs are nascent and have or are likely to exceed administrative cost caps during startup and 2) the programs are highly complex and have a small number of enrolled customers, especially for CCA-administered programs. PG&E argues that any further improvements achieved during its proposed billing process for 2022 and 2023 would only *decrease* CCAs' administrative efforts. Regarding content and quality, PG&E notes that it continues to work with the CCAs to identify billing and enrollment errors and streamline its process. Specifically, PG&E states that it worked with the CCAs to clarify the process to remove customers with closed accounts from the DAC CCA Report which will reduce the number of manual requests to remove participants and associated errors.

## **Discussion**

Energy Division (ED) finds that PG&E meets the requirements Resolution E-5125 OP 3 by submitting AL 6490-E-A as a Tier 2 AL instead of a Tier 1. ED also finds that PG&E meets the requirements of Resolution E-5124 Ordering Paragraph (OP) 4 by detailing the billing solution it has pursued as well as efforts to eliminate manual data transfers between PG&E and participating CCAs.

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<sup>7</sup> such as pulling data from PG&E's secure site and processing it to calculate bills

<sup>8</sup> PG&E Electric Rule 23, sheets 42 and 43, available here:

[https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC\\_RULES\\_23.pdf](https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_RULES_23.pdf)

The remaining issues raised in the Joint CCAs' protest are valid and PG&E's 2023 proposed plan does not fully resolve these concerns. We are hesitant to direct changes here given that the DAC-GT and CSGT programs are to be reviewed during the forthcoming Applications process. It is more prudent to wait until these data transfer and billing automation issues can be fully considered during the Applications proceeding, than to spend time and resources now at the risk of the outcome changing again in short order.

Accordingly, the Joint CCAs and PG&E should propose any remaining changes to the existing process during the forthcoming May 31, 2022 IOU DAC-GT and CSGT Applications and subsequent proceeding.<sup>9</sup>

Therefore, PG&E 6490-E-A is approved as filed with an effective date of May 11, 2022.

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<sup>9</sup> D.18-06-027 established that each IOU would file an Application for Review for the DAC-GT and CSGT programs by January 1, 2021. The CPUC Executive Director has since extended the deadline until May 31, 2022 (the 60th day following issuance and service of the Independent Evaluation Final Report). The proceeding(s) that may be initiated by these applications will review program goals, budget, capacity, design, implementation, and consumer protections.

April 1, 2022

**Advice 6490-E-A**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Supplemental: 2023 Budget Request for the Disadvantaged Community Green Tariff (DAC-GT) and Community Solar Green Tariff (CS-GT) Programs**

**Purpose**

In conformance with Ordering Paragraphs (OPs) 2 and 4 of Resolution E-4999 and as defined in Resolution E-5124 and Resolution E-5125, Pacific Gas and Electric Company (PG&E) hereby submits this Tier 2 Advice Letter including 2023 program budget estimates for the Disadvantaged Community Green Tariff (DAC-GT) and the Community Solar Green Tariff (CS-GT) programs, an annual Marketing, Education, and Outreach (ME&O) plan, and additional details on data transfers with participating Community Choice Aggregators (CCAs). This Tier 2 advice letter replaces AL 6409-E in its entirety and incorporates the changes described below.

**Background**

On June 3, 2019, the California Public Utilities Commission (Commission or CPUC) issued Resolution E-4999, which approved with modification, tariffs to implement the Disadvantaged Communities Green Tariff and Community Solar Green Tariff programs. Resolution E-4999, OP 2 and Resolution E-5125, OP 3, direct PG&E to submit an annual program budget estimate and an annual Marketing, Education, and Outreach (ME&O) plan via tier 2 advice letter by February 1 of every year, starting in 2020, for the next program year.<sup>1</sup>

Resolution E-4999, OP 4 directs that any unspent balance from the prior year be applied to the requested program funding, thereby reducing the amount of Public Purpose Program (PPP) funds needed or greenhouse gas (GHG) allowance proceeds that need to be set aside in the next Energy Resource Recovery Account (ERRA) Forecast.<sup>2</sup>

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<sup>1</sup> Resolution E-4999, p. 67, OP 2; Resolution E-5125, p. 11, OP 3.

<sup>2</sup> Resolution E-4999, p.68, OP 4.

PG&E outlines these program expenditures for DAC-GT and CS-GT and defines a budget request for 2023 in the following tables. The table presentations below update the previous table presentations in Advice Letter 6490-E to better capture unspent GHG allowance proceeds and align the available GHG funding with eligible budget expenditures in 2019 through 2022. Similarly, PGE has added a table that presents the status of requested PPP funding to date and aligns that revenue source with PPP-eligible budget expenditures in 2021 through 2022. The 2022 ERRA Forecast was the first filing where PPP and GHG eligible expenditures were differentiated.

Below are summary funding and expenditure tables for DAC-GT and CS-GT:

**Table 1: DAC-GT Greenhouse Gas (GHG) Summary Expenditures<sup>3</sup>**

Description	2019	2020	2021	2022
Remaining GHG Program Funds set-aside	\$ -	\$ (10,206,975)	\$ (9,556,568)	\$ (4,086,428)
Annual GHG Set Aside	\$ (11,499,000)	\$ (2,012,392)	\$ (740,831)	\$ (4,153,484)
Annual GHG-eligible Expenditures (Actuals) <i>2022 values represent forecasts</i>	\$ 1,292,025	\$ 2,662,799	\$ 6,210,971	\$ 4,153,484
Remaining GHG Program Funds set-aside (Cumulative balance (over)- / under- collected)	\$ (10,206,975)	\$ (9,556,568)	\$ (4,086,428)	\$ (4,086,428)

**Table 2: DAC-GT Public Purpose Program (PPP) Summary Expenditures**

Description	2019	2020	2021	2022
Remaining PPP Funding balance	\$ -	\$ -	\$ 48,534 <sup>4</sup>	\$ 5,220,321
Annual PPP Revenue (Actual / Forecast)	\$ -	\$ -	\$ -	\$ (4,149,775)
Annual PPP-funded Expenditures <i>2022 values represent forecasts</i>	\$ -	\$ 48,534 <sup>4</sup>	\$ 5,171,787	\$ 4,149,775
PPP Program Revenue (Cumulative balance (over)- / under- collected)	\$ -	\$ 48,534 <sup>4</sup>	\$ 5,220,321	\$ 5,220,321

<sup>3</sup> PG&E's 2022 ERRA Forecast Filing November Update Footnote 47: As described in PG&E AL 6308-E, the CARB prohibits using GHG funds to deliver volumetric discounts. Beginning in its 2022 ERRA Forecast filing, for both PG&E and the CCAs' DAC-GT and CS-GT programs, PG&E will set aside generation costs from GHG proceeds and all other costs from PPP. For PG&E, MCE, and EBCE, the set asides for DAC-GT and CS-GT programs will separate costs by funding source starting with Program Year (PY) 2022, and true-ups will separate carryovers by funding source starting with PY 2020. For SJCE, PCE, and CPSF, the set asides will separate costs by funding source starting with PY 2021, and true ups will separate carryovers by funding source starting with PY 2021 in the 2023 ERRA Forecast.

<sup>4</sup> This 2020 DAC-GT PPP-eligible program true-up cost is here separated from the original 2020 expenditures outlined in AL 6075-E-A, consistent with the note above. PG&E requested these true-up funds in the Annual Electric True-Up Advice Letter (AL 6509-E).

**Table 3: CS-GT Greenhouse Gas (GHG) Summary Expenditures**

<b>Description</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Remaining GHG Program Funds set-aside	\$ -	\$ (2,824,523)	\$ (5,060,184)	\$ (7,648,263)
Annual GHG Set Aside	\$ (3,000,000)	\$ (3,141,869)	\$ (2,887,113)	\$ -
Annual GHG-eligible Expenditures (Actuals) <i>2022 values represent forecasts</i>	\$ 175,477	\$ 906,208	\$ 299,034	\$ 39,448
Remaining GHG Program Funds set-aside (Cumulative balance (over)- /under- collected)	\$ (2,824,523)	\$ (5,060,184)	\$ (7,648,263)	\$ (7,529,919)

**Table 4: CS-GT Public Purpose Program (PPP) Summary Expenditures**

<b>Description</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Remaining PPP Funding balance	\$ -	\$ -	\$ -	\$ 1,273,421
Annual PPP Request (Actual / Forecast)	\$ -	\$ -	\$ -	\$(1,254,778)
Annual Expenditures <i>2022 values represent forecasts</i>	\$ -	\$ -	\$ 1,273,421	\$ 1,254,778
PPP Program Funding balance (Cumulative balance (over)- / under- collected)	\$ -	\$ -	\$ 1,273,421	\$ 1,273,421

**Community Choice Aggregation (CCA) Integration cost set aside and actuals from 2021**

In addition to expenses associated with PG&E programs, PG&E incurred costs associated with supporting the implementation of CCA programs in 2021 – the first year where these costs were tracked. These costs were forecasted and set aside in the CCAs' 2021 budgets as outlined below in Table 5, compared to actual expenses. Subsequent to disposition of this AL, PG&E will withhold the actual costs from the subsequent 2022 CCA disbursements consistent with conversations with both the CCAs and Energy Division.

**Table 5: 2021 CCA Integration Cost Summary**

Allocation	PY 2021 Actuals PG&E CCA Integration Costs	CCA PY 2021 Integration Cost Set Asides <sup>5</sup>	CCA PY 2022 Integration Cost Set Asides	CCA PY 2022 Integration Cost Expected Spend
CPSF	\$15,556	\$14,120	\$62,028	\$10,000
EBCE	\$15,556	\$14,120	\$62,028	\$10,000
MCE	\$15,556	\$14,120	\$62,028	\$10,000
PCE	\$15,556	\$15,870	\$62,028	\$10,000
SJCE	\$15,556	\$14,120	\$62,028	\$10,000
Total	\$77,780	\$70,600	\$310,141	\$50,000

In May 2021, PG&E updated its integration cost estimates for 2022 to include a contingency amount for development of a potential automated billing solution in 2022. Since then, PG&E and CCAs have worked collaboratively through the second half of 2021 to develop a semi-automated process that leverages existing CCA billing workflows to provide a customized report for billing DAC-GT participants.<sup>6</sup>

2021 does not provide a good baseline for understanding what steps in the current data transfer and billing system would benefit from additional automation, as it was reflective of the creation and startup of the current semi-automated process. PG&E anticipates that 2022 will reflect a steady state of the current semi-automated process that can provide a baseline for evaluating the cost and benefit of further automation.

Currently, PG&E is not planning to pursue a fully automated billing process due to other high-priority billing system projects through 2023. In 2022, PG&E will continue the collaboration with the CCAs to discuss what improvements, if any, should be considered for the current semi-automated process. In 2023, PG&E will evaluate the costs and benefits of a complete billing solution, including an analysis of the costs and benefits of the current system as compared to a fully automated solution. For these reasons, PG&E did not request that CCAs set aside additional costs for integration in 2023, as unspent funds from 2022 would be sufficient.

### **2023 Budget Request**

In conformance with Resolution E-4999, OP 2, PG&E submits the following DAC-GT and CS-GT budget request for 2023.<sup>7</sup>

<sup>5</sup> CPSF AL 15-E, EBCE AL 24-E, MCE AL 51-E (filed June 14, 2021) PCE AL 15-E (filed August 31, 2021) and SJCE AL 20-E (filed September 21, 2021).

<sup>6</sup> While the customized report has automated elements, customers must manually be added and removed from the report through a standardized data exchange.

<sup>7</sup> Resolution E-4999, p. 67, OP 2 - Beginning with the 2021 program budgets, no more than 10% of each program's budget may be allocated to program administration and no more than 4% allocated to ME&O.

As of January 23, 2021, DAC-GT has effectively been fully enrolled through the auto-enrollment process detailed in Resolution E-4999, OP 1(l) and D.20-07-008. Therefore, PG&E assumes that 2023 will have 12 months of full capacity enrollment<sup>8</sup> under the DAC-GT program, with associated generation costs, and costs for the 20% discount. The 2023 DAC-GT budget request is shown below.

**Table 6: DAC-GT 2023 Program Budget**

Generation Costs	\$ 3,771,794
Subtract available GHG carryover funds for Generation	\$ (3,771,794)
<i>2023 DAC-GT GHG Budget Request</i>	\$ -
20% Bill Discount	\$ 4,996,680
Program Management Costs	\$ 196,158
IT Costs	\$ 30,286
Add 2021 PPP Deficit Spending Actual (True-up)	\$ 5,171,787
<i>2023 DAC-GT PPP Budget Request</i>	\$ 10,394,911
<b>2023 DAC-GT Total Program Funding Request</b>	<b>\$ 10,394,911</b>

The 2023 DAC-GT generation costs reflect the cost of interim resources being used to serve current DAC-GT customers while dedicated resources are being procured and constructed. For DAC-GT and CS-GT, PG&E initiated procurement in the Spring of 2020 and submitted Advice Letter 5996-E on November 20, 2020 requesting Commission approval for five projects supporting the DAC-GT and CS-GT programs. The five 20-year power purchase agreements (PPAs) resulted in new solar photovoltaic (PV) projects located in eligible DACs within PG&E's service territory for a total of 10.65 megawatts (MW). Two of the five contracts will support the DAC-GT program and the remaining three contracts will support the CS-GT Program.<sup>9</sup>

On October 15, 2020, PG&E launched its second DAC-GT and CS-GT solicitation (the "Fall Solicitation"). From February 2021 through May 2021, PG&E executed five additional contracts resulting from the Fall Solicitation for an additional 27.11 MWs. PG&E submitted Advice Letter 6229-E on June 18, 2021 seeking approval for these five contracts.

In May 2021, PG&E launched its Spring 2021 DAC-GT and CS-GT solicitation<sup>10</sup> and has been working to submit an Advice Letter seeking approval of executed contracts with selected participants, which will be summarized in the quarterly report subsequent to that filing.

<sup>8</sup> Advice Letter 6075-E-A, p. 3 Outlines the transfer of 2.5 MW in May of 2022 to Peninsula Clean Energy DAC-GT program, adjusting the PG&E DAC-GT MW program cap to 52.32.

<sup>9</sup> [https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC\\_5996-E.pdf](https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_5996-E.pdf)

<sup>10</sup> Advice Letter 6127-E, seeking approval of solicitation documents to be used in a Spring 2021 DAC-GT and CS-GT solicitation, was approved in April 2021.

In December 2021, PG&E launched its Fall 2021 DAC-GT and CS-GT solicitation and is seeking offers from participants. PG&E anticipates working to submit an Advice Letter seeking approval of any executed contracts with selected participants resulting from the solicitation in approximately Q2 2022, which will be summarized in the quarterly report after that filing.

As of the date of this letter, there are no CS-GT projects online. Resultingly, no bill discount or generation costs have yet been incurred for the CS-GT program; however, PG&E estimates that the first CS-GT project will begin delivery in 2022. In its 2022 program year budget Advice Letter, PG&E included an expectation of bill discount and generation costs associated with these initial projects. At this point, PG&E expects two of three initially planned projects from 2022 to instead begin operating in 2023. This reduced 2022 expected spend is reflected in Tables 3 and 4 above. In the 2023 CS-GT forecast budget, PG&E applies unspent funds from 2021 and expected 2022 unspent funds due to the delayed projects to the 2023 CS-GT budget and budget request as shown below in Table 7.

**Table 7: CS-GT 2023 Program Budget**

Generation Costs <sup>11</sup>	\$ 507,981
Subtract available GHG carryover funds for Generation	\$ (507,981)
2023 CS-GT GHG Budget Request	\$ -
20% Bill Discount	\$ 1,342,619
Program Management Costs <sup>12</sup>	\$ 243,230
IT Costs	\$ 119,625
Add 2021 PPP Deficit Spending Actual (True-up)	\$ 1,273,421
2023 CS-GT PPP Budget Request	\$ <b>2,978,895</b>
<b>2023 CS-GT Total Program Funding Request</b>	<b>\$ 2,978,895</b>

The 2023 DAC-GT and CS-GT Combined budget and budget request, for 2023 is shown below in Table 8.

<sup>11</sup> PG&E anticipates a total of 6 CS-GT projects may come online as part of this program by the end of 2023. PG&E also assumes there will be enrollees in these projects who will receive the 20% discount.

<sup>12</sup> PG&E's Program Management request includes planned ME&O expenses from Table 9, except for website charges which are included in the planned IT costs. PG&E has also adjusted its Program Management request with an increase of \$24,796 per CPUC direction to account for independent program evaluator costs. PG&E has also decreased its ME&O request in 2023 to avoid duplicating "CBO and Sponsor Marketing" funding already requested in 2022. PG&E will carryover \$150,000 of expected remaining ME&O funds from 2022 ME&O funding to 2023 for this purpose.

**Table 8: DAC-GT and CS-GT 2023 Budget Request**

	<b>DAC-GT</b>	<b>CS-GT</b>	<b>Total</b>
DAC-GT and CS-GT 2023 Budget Forecast Request	\$ 10,394,911	\$ 2,978,895	\$ 13,373,806

### **Marketing, Education, and Outreach (ME&O) Plan**

#### ***2023 DAC-GT “Green Saver” ME&O Plan***

Because the DAC-GT program is fully enrolled through the automatic process defined in Resolution E-4999 and D.20-07-008, there is no active marketing, education, and outreach for the DAC-GT program.

#### ***2023 CS-GT “Local Green Saver” ME&O Plan***

Due to the expected timeline for program implementation, PG&E has shifted portions of the previously submitted CS-GT ME&O budget forward such that the 2021 CS-GT marketing budget submitted in AL 5749-E serves as the basis for the 2023 budget and ME&O plan.

PG&E plans to support CS-GT program enrollment by developing educational materials, resources, and supporting Community Based Organizations (CBO) and CS-GT project sponsors. PG&E’s CBO and CS-GT sponsor support includes:

1. PG&E marketing labor to create marketing collateral and support CBOs’ outreach, education, and enrollment activities efforts.
2. PG&E’s website will provide potential sponsors and customers with CS-GT program information and direct sponsors to resources to get started.
3. Marketing collateral for sponsors and potential enrollees highlighting program eligibility, benefits, and steps to becoming a sponsor.

PG&E must approve CBO and sponsor outreach plans with the budget for approved plans to be allocated on a first come, first served basis. To allow fair access to marketing budgets and fair compensation for CBO and sponsor time, we have established an estimate of \$30,000 per project (estimating \$180,000 total for 6 planned CS-GT projects for marketing, education and outreach (details below in Table 10)).

PG&E expects to review sponsor marketing materials before they are used to market to customers. All marketing materials must:

- Comply with the CPUC CCA Code of Conduct, including marketing and outreach requirements relative to community choice aggregation,
- Be truthful, accurate and not false or misleading,
- Conform with PG&E’s brand and logo usage guidelines, and
- Conform to Green-e guidelines.

Cost estimates for CS-GT budgets are preliminary until more details are available regarding the exact timing of projects to come online, and until the outreach efforts of (and the impacts of COVID-19 on) CBOs and sponsors can be more clearly defined.

**Table 9: CS-GT ME&O Breakdown**

Labor	\$ 18,000
CS-GT Website	\$ 5,000
Collateral Updates (Fact Sheet)	\$ 1,500
CBO and Sponsor Marketing Funding <sup>13</sup>	\$ -
Bill, Print, Mail Costs	\$ 522
<b>Total 2023 CS-GT Estimated Marketing Spend</b>	<b>\$ 25,022</b>

PG&E's CS-GT marketing budget conforms to the 4 percent ME&O budget cap required by Resolution E-4999.

### **Protests**

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than April 21, 2022, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

Sidney Bob Dietz II  
Director, Regulatory Relations  
c/o Megan Lawson  
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name and e-mail address of the protestant; and

<sup>13</sup> PG&E has also decreased its ME&O request in 2023 to avoid duplicating "CBO and Sponsor Marketing" funding already requested in 2022. PG&E will carryover \$150,000 of expected remaining ME&O funds from 2022 ME&O funding (outlined in AL 6075-E-A) to 2023 for this purpose.

statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

**Effective Date**

PG&E requests that this Tier 2 advice letter submittal become effective May 1, 2022 (30 days from the date of submission).

**Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.14-07-002. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

\_\_\_\_\_  
/S/

Sidney Bob Dietz II  
Director, Regulatory Relations

cc: Service List R.14-07-002



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39 E)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 6490-E-A

Tier Designation: 2

Subject of AL: Supplemental: 2023 Budget Request for the Disadvantaged Community Green Tariff (DAC-GT) and Community Solar Green Tariff (CS-GT) Programs

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Resolution E-4999

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

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: 5/1/22

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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

Tariff schedules affected: N/A

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

Pending advice letters that revise the same tariff sheets: N/A

<sup>1</sup>Discuss in AL if more space is needed.

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

California Public Utilities Commission  
Energy Division Tariff Unit Email:  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson  
Title: Director, Regulatory Relations  
Utility/Entity Name: Pacific Gas and Electric Company  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email: PGETariffs@pge.com

Contact Name:  
Title:  
Utility/Entity Name:  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

CPUC  
Energy Division Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

Clear Form

**PG&E Gas and Electric  
Advice Submittal List  
General Order 96-B, Section IV**

AT&T  
Albion Power Company

Alta Power Group, LLC  
Anderson & Poole

Atlas ReFuel  
BART

Barkovich & Yap, Inc.  
Braun Blasing Smith Wynne, P.C.  
California Cotton Ginners & Growers Assn  
California Energy Commission

California Hub for Energy Efficiency  
Financing

California Alternative Energy and  
Advanced Transportation Financing  
Authority  
California Public Utilities Commission  
Calpine

Cameron-Daniel, P.C.  
Casner, Steve  
Center for Biological Diversity

Chevron Pipeline and Power  
City of Palo Alto

City of San Jose  
Clean Power Research  
Coast Economic Consulting  
Commercial Energy  
Crossborder Energy  
Crown Road Energy, LLC  
Davis Wright Tremaine LLP  
Day Carter Murphy

Dept of General Services  
Don Pickett & Associates, Inc.  
Douglass & Liddell

East Bay Community Energy Ellison  
Schneider & Harris LLP  
Engineers and Scientists of California

GenOn Energy, Inc.  
Goodin, MacBride, Squeri, Schlotz &  
Ritchie  
Green Power Institute  
Hanna & Morton  
ICF  
International Power Technology

Intertie

Intestate Gas Services, Inc.  
Kelly Group  
Ken Bohn Consulting  
Keyes & Fox LLP  
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated  
Waste Management Task Force  
MRW & Associates  
Manatt Phelps Phillips  
Marin Energy Authority  
McClintock IP  
McKenzie & Associates

Modesto Irrigation District  
NLine Energy, Inc.  
NRG Solar

OnGrid Solar  
Pacific Gas and Electric Company  
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

Redwood Coast Energy Authority  
Regulatory & Cogeneration Service, Inc.  
SCD Energy Solutions  
San Diego Gas & Electric Company

SPURR  
San Francisco Water Power and Sewer  
Sempra Utilities

Sierra Telephone Company, Inc.  
Southern California Edison Company  
Southern California Gas Company  
Spark Energy  
Sun Light & Power  
Sunshine Design  
Tecogen, Inc.  
TerraVerde Renewable Partners  
Tiger Natural Gas, Inc.

TransCanada  
Utility Cost Management  
Utility Power Solutions  
Uplight  
Water and Energy Consulting Wellhead  
Electric Company  
Western Manufactured Housing  
Communities Association (WMA)  
Yep Energy