

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



April 10, 2023

**Advice Letter 6869-E-A**

Sidney Bob Dietz II  
Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, California 94177  
E-mail: PGETariffs@pge.com

**SUBJECT: Joint Investor-Owned Utility Notice of Solar on Multifamily Affordable Housing Program Funding True-Up for 2022 Recorded Greenhouse Gas Allowance Revenues Pursuant to Decision 22-09-009**

Dear Mr. Dietz:

Pacific Gas and Electric Company Advice Letter 6869-E-A is effective as of March 1, 2023.

Sincerely,

Handwritten signature of Leuwam Tesfai in black ink.

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

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March 28, 2023

**ADVICE 4978-E-A**  
**(Southern California Edison Company ID U 338-E)**

**ADVICE 6869-E-A**  
**(Pacific Gas and Electric Company ID U 39-E)**

**ADVICE 4167-E-A**  
**(San Diego Gas & Electric Company ID U 902-E)**

**ADVICE 214-E-A**  
**(Liberty Utilities (CalPeco Electric) LLC Company ID U 933-E)**

**ADVICE 712-E-A**  
**(PacifiCorp Company ID U 901 E)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
ENERGY DIVISION

**SUBJECT:** Supplement to Joint Investor-Owned Utility Notice of Solar on Multifamily Affordable Housing Program Funding True-Up for 2022 Recorded Greenhouse Gas Allowance Revenues Pursuant to Decision 22-09-009

Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Liberty Utilities Company (Liberty), and PacifiCorp Company (PacifiCorp), collectively the “Joint IOUs,” hereby submit to the California Public Utilities Commission (Commission or CPUC) the following supplemental notice of final 2022 Solar on Multifamily Housing (SOMAH) funding allocations for each IOU.

**PURPOSE**

Pursuant to Ordering Paragraph (OP) 4 of Decision (D.)22-09-009, this supplemental advice letter establishes the final proportionate share of the \$100 million cap in annual SOMAH funding and the final 2022 true-up to be incorporated into the Joint IOUs’ respective Energy Resource Recovery Account (ERRA) or Energy Cost Adjustment Clause (ECAC) forecast proceedings that are filed in 2023 for the 2024 forecast year.

This supplemental advice letter replaces original Advice 4978-E *et al* in its entirety.

## **BACKGROUND**

Pursuant to Assembly Bill (AB) 693 (Stats. 2015, Ch. 582), D.17-12-022 established the SOMAH program to provide financial incentives for installation of solar energy systems on multifamily affordable housing properties, as specified in the statute. Public Utilities Code Section 2870(c) provides:

The Commission shall annually authorize the allocation of one hundred million dollars (\$100,000,000) or ten percent of available funds, whichever is less, from the revenues described in subdivision (c) of Section 748.5 for the Multifamily Affordable Housing Solar Roofs Program, beginning with the fiscal year June 30, 2020. The commission shall continue authorizing the allocation of these funds through June 30, 2026, if the commission determines that revenues are available after 2020 and that there is adequate interest and participation in the program.

The statute provides for a maximum annual budget of \$100 million, and also creates a structure wherein each IOU's annual contribution amount is based on the total allocated allowance auction proceeds of all the other IOUs. Funding for the SOMAH program is set aside annually by the IOUs' ERRA forecast application and ECAC applications. Pursuant to D.17-12-022, the Commission in D.20-04-012 continued authorizing the allocation of SOMAH funds through June 30, 2026.

On May 13, 2022, SCE filed a petition for modification (PFM) of D.17-12-022 and D.20-04-012, requesting to modify the process by which the IOUs initially set aside SOMAH funds, asserting that the IOUs were likely setting aside SOMAH funding in excess of \$100 million (prior to their annual true-up). The PFM proposed to clarify that the IOUs may submit a SOMAH funding set-aside in their respective ERRA Forecast and ECAC proceedings by applying the \$100 million cap on a forecast basis. Of particular relevance to this advice letter, SCE also requested that the IOUs coordinate to submit a joint true-up advice letter, rather than each IOU submitting its own advice letter as directed by D.20-04-012.

On September 25, 2022, the Commission adopted D.22-09-009, which modified D.17-12-022 and D.20-04-012 to simplify the process for forecasting and setting aside funding for the SOMAH program, including approving the request for a Joint IOU advice letter true-up.

While D.22-09-009 does not alter the existing true-up advice letter process, pursuant to OP 4, through modification of language on page 11 of D.20-04-022, the Joint IOUs may jointly submit a Tier 1 advice letter showing each IOU's prior year recorded greenhouse gas (GHG) allowance revenue and, if the \$100 million cap is reached, a calculation of each IOU's proportionate share of \$100 million.

D.22-09-009 modified the language on page 11 of D.20-04-012 as follows (additions underlined):

The true-up for the final three months of each year shall occur via a joint (i.e., jointly submitted by all five electric IOUs) Tier 1 advice letter, and submitted by one of the three large electric IOUs (PG&E, SCE, or SDG&E) on behalf of all five electric IOUs, as soon as this information becomes available, and no later than March 1 of the following year.

## **DISCUSSION**

Consistent with the requirements of D.20-04-012 as modified by D.22-09-009, Table 1 below reflects a final accounting of each IOU's total GHG allowance revenues for 2022 as tracked in the IOUs' respective GHG revenue balancing account. The true-up or credit amount for 2022 is the difference between the IOUs' share of the \$100 million cap and the previously approved set aside in the 2022 ERRAs or ECAC filings. These 2022 true-up or credit amounts will be incorporated into each of the IOU's 2024 ERRAs and ECAC forecast proceedings.

**Table 1**

**2022 Recorded GHG Allowance Revenue and Allocation of SOMAH Funding**

<b>IOU</b>	<b>2022 Recorded GHG Proceeds</b>	<b>Proportion of Total Proceeds</b>	<b>Share of \$100M</b>	<b>Previously Approved Set Aside in 2022 ERRAs or ECAC</b>	<b>True-up/Difference (Share of \$100M Less Previously Approved Set Aside)*</b>
SCE	700,179,282	50.13%	50,134,994	73,364,564	(18,592,218)
PG&E	486,243,930	34.82%	34,816,563	46,409,172	(11,592,609)
SDG&E	189,236,214	13.55%	13,549,896	14,949,939	(1,400,043)
Liberty	5,365,389	0.38%	384,178	446,231	(62,053)
PacifiCorp	15,563,147	1.11%	1,114,369	1,556,315	(441,946)
Total	1,396,587,962	100.00%	100,000,000	136,726,221	(32,088,869)

\* SCE includes two years of reconciliation in the current year true up. See tables below for details.

The annual true-up accounting tables, unique to each IOU, are shown below in Tables 2 through 6 below.

**Table 2 - SCE**

Line No.	SOMAH Funding Prior Years True Up	Recorded GHG Allowance Revenues	Set-Aside Based		Difference
			On 10% Of Recorded GHG Allowance Revenue (or \$100M limit)	Previously Approved "Actual" Set-Aside*	
1	2016	\$188,087,539	\$18,808,754	\$0	\$18,808,754
2	2017	\$384,894,152	\$38,489,415	\$8,077,000	\$30,412,415
3	2018	\$389,316,108	\$38,931,611	\$39,125,783	(\$194,173)
4	2019	\$421,170,202	\$42,117,020	\$40,853,635	\$1,263,386
5	2020	\$420,965,362	\$42,096,536	\$73,281,647	(\$31,185,111)
6	2021*	\$551,751,564	\$49,498,366	\$63,966,285	(\$14,467,919)
7	2022	\$709,100,721	\$50,134,994	\$ 73,364,564	(\$23,229,570)
<b>8</b>	<b>Total</b>	<b>\$3,065,285,646</b>	<b>\$280,076,697</b>	<b>\$298,668,914</b>	<b>(\$18,592,218)</b>

Funding true-up through 2022 (or credit) entry in the GHGRBA) **(\$18,592,218)**

**Table 3 - PG&E**

Year	Recorded GHG Allowance Revenues	Set Aside Based on 10% of Recorded GHG Revenue (or \$100M limit)	Actual Set Aside <sup>(a)</sup>	Difference (Actual Set Aside - 10% Recorded Set Aside or \$100M limit)
2016 <sup>(b)</sup>	\$301,670,155	\$15,083,508	\$15,083,508	\$0
2017	\$345,513,934	\$34,551,393	\$34,551,393	\$0
2018	\$348,098,763	\$34,809,876	\$34,809,876	\$0
2019	\$389,040,958	\$38,904,096	\$38,904,096	\$0
2020	\$385,893,957	\$38,589,396	\$38,589,396	\$0
2021	\$384,773,215	\$34,518,517	\$34,518,517	\$0
2022 <sup>(c)</sup>	\$486,243,930	\$34,816,563	\$46,409,172	\$11,592,609
<b>TOTAL</b>	<b>\$2,641,234,913</b>	<b>\$231,273,349</b>	<b>\$242,865,958</b>	<b>\$11,592,609</b>

- (a) Years 2016-2018 include true-ups for previous under-collections, which were collected in 2020 (\$29.52 million) per D.20-02-047 and 2021 (\$4.45 million) per D.20-12-038. Year 2019 includes the true-up (\$1.17 million), which was collected in 2019. Year 2020 includes the netting of the over-collection from the 2022 set aside request (\$187 thousand), which was performed in 2022 per D.22-02-002. Year 2021 includes the true-up (\$2.91 million), which was collected in 2023 per D.22-12-044. Year 2022 is the actual set aside performed quarterly in 2022 based on the forecast approved in D.22-02-002. Year 2022 is the only year with a pending true-up (credit) collection.
- (b) AB 693 implemented SOMAH mid-way through 2016; therefore, GHG Revenues and set aside amount are pro-rated 50 percent and totals reflect the pro-rated amounts.
- (c) Based on 2022 recorded GHG allowance revenues and the IOU \$100 million cap, PG&E over-forecasted the 2022 set aside by \$11.59 million. In the 2024 ERRA Forecast Filing, PG&E plans to propose enacting the true-up by netting the 2022 reserve of \$11.59 million from the 2024 SOMAH set aside request.

**Table 4 - SDG&E**

<b>SOMAH Reconciliation</b>				
<b>Calendar Year ERRA Forecast</b>	<b>Recorded GHG Allowance Revenues</b>	<b>Set-Aside Based On 10% of Recorded GHG Allowance Revenue or the Proportionate Amount of \$100M</b>	<b>Actual Set-Aside</b>	<b>Difference (Actual Less Set-Aside Requirement)</b>
2016	40,779,160	4,077,916	-	(4,077,916)
2017	92,539,677	9,253,968	-	(9,253,968)
2018	93,727,555	9,372,756	10,300,000	927,245
2019	104,156,909	10,415,691	10,115,640	(300,051)
2020	104,691,923	10,469,192	18,222,844	7,753,652
2021	161,825,842	14,517,611	35,975,035	21,457,424
2022	189,236,214	13,549,896	14,949,939	1,400,043
<b>Total</b>	<b>786,957,280</b>	<b>71,657,029</b>	<b>89,563,458</b>	<b>17,906,429</b>

**Table 5 – Liberty**

<b>ECAC Year</b>	<b>Recorded GHG Allowance Revenues</b>	<b>Set-Aside</b>	<b>Previously Approved Set-Aside</b>	<b>Difference</b>
2017	\$ 3,286,196	\$ 304,838	\$ 287,032	\$ 17,806
2018	\$ 3,401,885	\$ 365,809	\$ 349,673	\$ 16,136
2019	\$ 3,819,620	\$ 425,082	\$ 466,130	\$ (41,048)
2020	\$ 3,794,503	\$ 379,450	\$ 362,585	\$ 16,865
2021	\$ 4,220,989	\$ 378,671	\$ 333,475	\$ 45,196
2022	\$ 5,365,389	\$ 384,178	\$ 446,231	\$ (62,053)
<b>Total</b>	<b>\$ 23,888,582</b>	<b>\$ 2,238,028</b>	<b>\$ 2,245,126</b>	<b>\$ (7,098)</b>

**Table 6 – PacifiCorp**

Calendar Year ECAC Forecast	Recorded GHG Allowance Revenues	Set-Aside Based on 10% of Recorded GHG Allowance Revenue or Share of \$100M Limit	Actual Set-Aside]	Difference  (Actual Set-Aside - 10% Set-Aside)
2016	\$9,387,611	\$469,380	\$469,380	\$0
2017	\$10,681,011	\$1,068,101	\$1,068,101	\$0
2018	\$11,216,803	\$1,121,680	\$1,121,680	\$0
2019	\$12,783,641	\$1,278,364	\$1,278,364	\$0
2020	\$13,082,153	\$1,308,215	\$1,308,215	\$0
2021	\$12,114,799	\$1,086,835	<u>\$ 1,211,479</u>	\$124,644
2022	\$15,563,147	\$1,114,369	\$1,556,315	\$441,946

**TIER DESIGNATION**

Pursuant to OP 4 of D.22-09-009, this advice letter is submitted with a Tier 1 designation, which is the same tier designation as original Advice 4978-E.

**EFFECTIVE DATE**

This Tier 1 advice letter will become effective on March 1, 2023, which is the same date requested in the original Advice 4978-E.

**NOTICE**

Anyone wishing to protest this advice letter may do so electronically. Protests must be received no later than 20 days after the date of this advice letter. Protests should be submitted to the CPUC Energy Division at:

E-mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

In addition, protests and all other correspondence regarding this advice letter should also be sent electronically to the attention of:

SCE: Connor Flanigan  
 Managing Director, State Regulatory Operations  
 E-mail: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)

Tara S. Kaushik  
 Managing Director, Regulatory Relations  
 c/o Karyn Gansecki

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E-mail: [Karyn.Gansecki@sce.com](mailto:Karyn.Gansecki@sce.com)

PG&E: Sidney Bob Dietz II  
Director, Regulatory Relations  
c/o Megan Lawson  
E-mail: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)

SDG&E: Greg Anderson  
Regulatory Tariff Manager  
E-mail: [GAnderson@sdge.com](mailto:GAnderson@sdge.com)  
[SDGETariffs@sdge.com](mailto:SDGETariffs@sdge.com)

PacifiCorp: Joe Dallas  
Senior Attorney  
Pacific Power  
825 NE Multnomah, Suite 2000  
Portland, OR 97232  
Telephone: (503) 813-5701  
E-mail: [joseph.dallas@pacificcorp.com](mailto:joseph.dallas@pacificcorp.com)

Liberty: Liberty Utilities (CalPeco Electric) LLC  
Attn: Advice Letter Protests  
933 Eloise Avenue  
South Lake Tahoe, CA 96150  
Email: [CaseAdmin@libertyutilities.com](mailto:CaseAdmin@libertyutilities.com)

There are no restrictions on who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached GO 96-B and R.14-07-002 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com) or at (626) 302-6838. For changes to all other 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).

To view other SCE advice letters submitted with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>. For questions, please contact Matt Sheriff at (626) 302-1895 or by electronic mail at [Matt.Sheriff@sce.com](mailto:Matt.Sheriff@sce.com).

**Southern California Edison Company**

/s/ Connor Flanigan  
Connor Flanigan

CF:ms:lp



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Darrah Morgan  
 Phone #: (626) 302-2086  
 E-mail: AdviceTariffManager@sce.com  
 E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE  
 ELC = Electric      GAS = Gas      WATER = Water  
 PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4978-E-A et al.

Tier Designation: 1

Subject of AL: Supplement to Joint Investor-Owned Utility Notice of Solar on Multifamily Affordable Housing Program  
 Funding True-Up for 2022 Recorded Greenhouse Gas Allowance Revenues Pursuant to Decision  
 22-09-009

Keywords (choose from CPUC listing): Compliance, Solar

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:   
 Decision 22-09-009

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: 3/28/23

No. of tariff sheets: -0-

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: None

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

Pending advice letters that revise the same tariff sheets: None

<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: Connor Flanigan  
Title: Managing Director, State Regulatory Operations  
Utility/Entity Name: Southern California Edison Company  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email: AdviceTariffManager@sce.com

Contact Name: Tara S. Kaushik c/o Karyn Gansecki  
Title: Managing Director, Regulatory Relations  
Utility/Entity Name: Southern California Edison Company  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email: karyn.gansecki@sce.com

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

Clear Form

## 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	

**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 Blaising 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  
Downey Brand LLP  
Dish Wireless L.L.C.

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

GenOn Energy, Inc.  
Green Power Institute  
Hanna & Morton  
ICF

iCommLaw  
International Power Technology  
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin  
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.

Resource Innovations

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  
Stoel Rives LLP

Tecogen, Inc.  
TerraVerde Renewable Partners  
Tiger Natural Gas, Inc.

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