

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 13, 2023

Advice Letter 6905-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: 2024 Budget and Funding Request for the Disadvantaged Community Green Tariff (DAC-GT) and Community Solar Green Tariff (CS-GT) Programs

Dear Mr. Dietz:

Pacific Gas and Electric Company Advice Letter 6905-E-A is effective as of June 18, 2023.

Sincerely,

A handwritten signature in black ink that reads "Leuwam Tesfai".

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

May 19, 2023

Advice 6905-E-A

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Supplemental: 2024 Budget and Funding 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 further detailed in Resolution E-5124 and Resolution E-5125, Pacific Gas and Electric Company (PG&E) hereby submits this Supplemental Tier 2 Advice Letter replacing Advice Letter 6905-E in its entirety. This supplement sets forth PG&E's 2024 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 detail concerning under collection of Public Purpose Program (PPP) funds associated with disbursements to participating Community Choice Aggregators (CCAs).

Background

This supplement addresses issues raised by the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) in their protest to Advice Letter 6905-E served on April 24, 2023. Cal Advocates' protest primarily stems from a tabulation error which resulted in omission of approximately \$6 million in DAC-GT 2024 expected PPP spend associated with bill discounts. Cal Advocates also asserted that the advice letter failed to include marketing, education and outreach costs as a separate line item in the budget requests. In addition to addressing these issues, a detailed description of the 2022 PPP under collection associated with CCA disbursements has been added to this supplement.

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 a tier 2 advice letter by February 1 of every year, starting in 2020, for the next program year.¹

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 PPP funds needed or greenhouse gas (GHG) allowance proceeds that need to be set aside in the next Energy Resource Recovery Account (ERRA) Forecast.²

By program, PG&E outlines GHG and PPP prior year carry-overs, separately, in Tables 1 through 4. These carry-overs are used to establish a 2024 funding request outlined in Table 7 and 8. The 2022 ERRA Forecast was the first filing where PPP and GHG eligible expenditures were differentiated.

Tables 1 and 3 present unspent GHG allowance proceeds from prior years with actual GHG-eligible expenditures in 2022 and forecasted expenditures and set asides in 2023.

Tables 2 and 4 present uncollected PPP-expenditures from prior years with actual PPP-eligible expenditures in 2022 and forecasted expenditures and revenues in 2023.

The 2023 forecasted expenditures presented here are consistent with the 2023 Budget AL³, and 2023 forecasted GHG set asides and PPP revenues are consistent with PG&E's 2023 ERRA Forecast filing.⁴

Below are summary funding and expenditure tables for DAC-GT and CS-GT in 2022 and 2023: ⁵

¹ Resolution E-4999, p. 67, OP 2; Resolution E-5125, p. 11, OP 3. Additionally, on February 1, 2023, the Executive Director of the CPUC, granted PG&E and SCE an extension to file their 2024 Annual Budget AL requests for the DAC-GT and CS-GT programs on April 3, 2023.

² Resolution E-4999, p.68, OP 4.

³ PG&E AL 6490-E-A

⁴ D.22-12-044 approved PG&E's 2023 ERRA Forecast filing

⁵ Prior year carry-overs have been reconciled to the 2022 program balancing account subledgers as presented in PG&E's 2022 ERRA Compliance filing. The primary impact of this is to now include interest, which was not included in the prior year carryovers in prior PG&E budget advice letters.

Table 1: DAC-GT Greenhouse Gas (GHG) Summary Expenditures ⁶

Description	Actuals	Forecasts
	2022	2023
Prior Year GHG Carry-Over	\$ (4,046,469)	\$(6,696,403)
Annual GHG Set Aside	\$ (4,803,921) ⁷	\$ -
Annual GHG-eligible Expenditures	\$ 2,153,987	\$ 3,771,794
Remaining GHG Program Funds set-aside (Cumulative balance (over)- / under- collected)	\$ (6,696,403)	\$ (2,964,568)

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

Description	Actuals	Forecasts
	2022	2023
Prior Year PPP Carry-Over	\$5,171,787	\$7,780,628
Annual PPP Revenue	\$ (3,494,269)	\$ (10,394,911)
Annual PPP-funded Expenditures	\$ 6,103,111 ⁸	\$ 5,223,124
PPP Program Revenue (Cumulative balance (over)- / under- collected)	\$7,780,628	\$2,608,841

⁶ PG&E's 2022 ERRRA 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 ERRRA Forecast filing, for both PG&E and the CCAs' DAC-GT and CS-GT programs, PG&E sets aside generation costs from GHG proceeds and requests PPP funding for all other program costs. For PG&E, MCE, and EBCE, the set asides for DAC-GT and CS-GT programs separated costs by funding source starting with Program Year (PY) 2022, and true-ups were separated by funding source starting with PY 2020 carryovers. For SJCE, PCE, and CPSF, the set asides separated costs by funding source starting with PY 2021, and true-ups were separated by funding source starting with PY 2021 carryovers in the 2023 ERRRA Forecast.

⁷ Consistent with lines 5 and 7 of Table H of PG&E's approved 2022 ERRRA Forecast Application, PG&E set aside \$4.8M in DAC-GT GHG funds from the GHG Revenue Balancing Account.

⁸ Consistent with Table 5-1 in PG&E's 2022 ERRRA Compliance Filing.

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

Description	Actuals	Forecasts
	2022	2023
Prior Year GHG Carry-Over	\$(7,936,092)	\$(5,818,644)
Annual GHG Set Aside	\$ 2,117,448 ⁹	\$ -
Annual GHG-eligible Expenditures	\$ - ¹⁰	\$ 507,981
Remaining GHG Program Funds set-aside (Cumulative balance (over)- /under- collected)	\$(5,818,644)	\$(5,310,663)

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

Description	Actuals	Forecasts
	2022	2023
Prior Year PPP Carry-Over	\$ 1,273,421	\$ 331,305
Annual PPP Revenue	\$ (1,044,357)	(\$2,978,895)
Annual Expenditures	\$ 102,241	\$ 1,705,474
PPP Program Funding balance (Cumulative balance (over)- / under- collected)	\$ 331,305	\$ (942,116)

Community Choice Aggregation (CCA)**Integration Costs**

In addition to expenses associated with PG&E programs, PG&E incurred costs associated with supporting the implementation of CCA programs on an ongoing basis beginning in 2021. Since 2021 PG&E has forecasted these costs and provided the forecast to CCAs for inclusion in the CCA budget requests, which are then approved in the ERRA Forecast proceeding and disbursed on a quarterly basis over the applicable program year. In 2022, PG&E anticipated withholding its 2021 actual CCA integration costs from the 2022 disbursements; however, several CCAs required PG&E to provide the full disbursements and instead invoice for 2021 actual costs in the first half of 2022.

⁹ Consistent with lines 6 and 8 of Table H of PG&E's approved 2022 ERRA Forecast Application, PG&E refunded \$2.1M in CS-GT GHG funds to the GHG Revenue Balancing Account.

¹⁰ PG&E expected to have numerous projects online in 2022 which were delayed, resulting in zero GHG-eligible expenditure. These projects are planned to come online starting in 2023.

PG&E anticipates again invoicing CCAs in 2023 for 2022 actual costs, as the 2022 CCA integration costs were again budgeted for in CCA funding requests and included in PG&E's 2022 disbursements to CCAs. Finally, PG&E anticipates invoicing CCAs in the first half of 2024 for 2023 actual CCA integration costs as these were again included in the CCA 2023 budget requests and will again be included in the 2023 disbursed amounts.

Starting in 2024, PG&E anticipates using a simplified approach to track CCA integration costs that avoids PG&E disbursing integration-related funds to the CCAs only to invoice them back based on actuals the following year.

This simplification was discussed throughout 2022 among PG&E, Energy Division and CCAs. Consistent with these discussions, PG&E submitted AL 6872-E¹¹ which was disposed with an effective date of April 1, 2023. That AL requests that PG&E add a new line in its own DAC-GT subaccount for purposes of tracking CCA Integration costs so that PG&E would request and track these funds internally rather than via each CCA's budget requests. On an annual basis, PG&E would then true-up the budgeted amount versus actuals and carry over any unspent funds or true-up overspending from the prior year in its subsequent budget AL. In this anticipated process, CCA Integration costs would still be provided to CCAs consistent with OP5 of Resolution 5124¹² and be presented separately in each PG&E budget advice letter so that these costs can be considered in any analysis of total CCA program administrative expenses.

For 2024, PG&E has provided 2022 actual and 2024 forecasted CCA integration costs to the CCAs, consistent with OP5 of Resolution 5124,¹³ but consistent with AL 6872-E, PG&E anticipates that the CCAs would not include these forecasted amounts in their 2024 budget requests. In the CCA integration cost summary table below, PG&E reflects that for 2024, each CCA expects to request zero dollars for CCA integration costs; instead, PG&E would request \$20,000 in PPP funding to cover forecasted 2024 CCA integration expense. Note this table is updated from PG&E's 2023 Budget AL¹⁴ to capture the actual CCA Integration cost funding amounts in 2022, rather than the forecasted amounts that PG&E provided to the CCAs (in some cases the CCAs requested different amounts).

¹¹ Available at: https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_6872-E.pdf

¹² Available at:

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M378/K421/378421442.PDF>

¹³ Available at:

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M378/K421/378421442.PDF>

¹⁴ PG&E AL 6490-E-A

Table 5: CCA Integration Cost Summary

Entity	2021 CCA Funding Request	2021 Actuals ¹⁵	2022 CCA Funding Request	2022 Actuals ¹⁶	2023 CCA Funding Request	PY 2023 Expected Spend ¹⁷	PY 2024 Funding Request	PY 2024 Expected Spend
CPSF	\$(14,119)	\$15,556	\$(62,028)	\$3,941	\$(2,430)	\$4,000	\$-	\$4,000
EBCE	\$(14,119)	\$15,556	\$(62,028)	\$3,941	\$(2,430)	\$4,000	\$-	\$4,000
MCE	\$(14,119)	\$15,556	\$(62,028)	\$3,941	\$(2,430)	\$4,000	\$-	\$4,000
PCE	\$(15,870)	\$15,556	\$(62,028)	\$3,941	\$(2,430)	\$4,000	\$-	\$4,000
SJCE	\$-	\$15,556	\$-	\$3,941	\$-	\$4,000	\$-	\$4,000
PG&E	\$-	\$-	\$-	\$-	\$-	\$-	\$(20,000)	\$-
Total	(58,227)	\$77,780	(248,112)	\$19,703	\$(9,720)	\$20,000	(20,000)	\$20,000

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 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. Throughout 2022 PG&E has provided a bi-weekly update of the customers included in this report, and in late 2022, also began delivering an additional quarterly report of all customers identified as CCA DAC-GT or CS-GT customers in PG&E's billing system. As of the end of 2022, through these regular processes, PG&E was providing DAC-GT/CS-GT related bill information for approximately 7,000 customers, enabling all five CCAs to run their programs, which collectively planned to deliver approximately \$1.3 million in bill savings throughout 2023.

Consistent with the Energy Division's disposition of PG&E's 2023 Budget AL,¹⁸ the Joint CCAs and PG&E are evaluating proposals to further reduce manual CCA billing processes in the Green Access Programs proceeding, which arose from the IOUs' DAC-GT/CS-GT Applications for Review. In that Proceeding, the Joint CCAs' testimony discussed inefficiencies in the current process and suggested several improvements. PG&E has requested information from the CCAs that would enable quantification of the efficiency benefit of these proposed improvements so that a cost and benefit analysis can be made of these proposals. PG&E anticipates that the Commission will decide on any proposed improvements in that proceeding based on the information presented.

¹⁵ 2021 Actuals were invoiced in the first half of 2022

¹⁶ 2022 Actuals will be invoiced in the first half of 2023

¹⁷ 2023 Actuals will be provided to CCAs per OP 5 of Resolution 5124 and are anticipated to be invoiced in the first half of 2024

¹⁸ Available here: https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_6490-E-A.pdf

PPP Under-collection True-up

2022 was the first year for which both GHG and PPP funds were requested, approved and subsequently delivered to the CCAs in quarterly disbursements. This was through the 2022 budget advice letters (establishing 2022 requirements for both GHG and PPP funds across all PAs), the 2022 ERRA Forecast decision (formally approving the collective GHG set-aside of funds for 2022) and Annual Electric True Up filings (formally placing the collective 2022 PPP revenue requirement in rates). In contrast to GHG funds, the PPP revenues over the year do not precisely align with the requested amount. Because the PPP rate component and revenue allocations are all based on 2022 forecasted sales, there is inevitably variation between the PPP funding need that is established in the annual budget advice letters and the actual PPP revenue that is allocated to each PA's balancing account.

For 2022, PPP revenue was below the funding need across all DAC-GT and CS-GT programs in PG&E's service area. For PG&E's programs, this variation is reflected in Tables 2 and 4, where PG&E presents the actual revenue relative to actual expense.

In contrast to PG&E programs, the CCAs receive quarterly disbursements based on the 2022 funding needs for both GHG and PPP funds. Hence PG&E has disbursed funds based on anticipated PPP revenue rather than actual PPP revenue. Consequently, for 2022 PG&E under collected a total of \$0.811M relative to the 2022 disbursements to CCAs due to the variance in PPP revenue. The CCA-specific disbursement amounts are provided below. To reconcile this variance, PG&E is requesting additional PPP funds for 2024, which will be allocated to each CCA's balancing account accordingly.

Table 6: CCA PPP True-up

	2022
MCE	
Disbursement	\$ 1,892,301
Actual Funding (GHG Set Aside + PPP Revenue)	\$ 1,702,469
Additional PPP Request to Reconcile	\$ 189,832
EBCE	
Disbursement	\$ 1,341,840
Actual Funding (GHG Set Aside + PPP Revenue)	\$ 1,217,040
Additional PPP Request to Reconcile	\$ 124,800
SJCE	
Disbursement	\$ 1,566,122
Actual Funding (GHG Set Aside + PPP Revenue)	\$ 1,418,645
Additional PPP Request to Reconcile	\$ 147,477
PCE	
Disbursement	\$ 1,592,208

Actual Funding (GHG Set Aside + PPP Revenue)	\$	1,421,302
Additional PPP Request to Reconcile	\$	170,906
CPSF		
Disbursement	\$	1,723,701
Actual Funding (GHG Set Aside + PPP Revenue)	\$	1,545,054
Additional PPP Request to Reconcile	\$	178,647
Total CCA Additional PPP Reconciliation	\$	811,662

2024 Budget Request for PG&E programs

In conformance with Resolution E-4999, OP 2, PG&E submits the following DAC-GT and CS-GT budgets and funding requests for 2024.¹⁹ Note that the prior year carryovers applied to the 2024 budgets to determine the 2024 funding requests are the expected 2023 carryover rather than the 2022 actuals-based carryovers. This is different from prior budget advice letters, wherein the prior year carryovers were based only on the actuals-based carryover from the prior year, rather than the expected carryover from the present year.

PG&E takes this approach to avoid requesting unnecessarily large PPP revenues for 2024. Due to the transition from full GHG funding to combined GHG and PPP funding, which first occurred in the 2022 ERRA Forecast proceeding and the 2023 DAC-GT/CS-GT Budget Advice Letter, PG&E ended 2022 with significant uncollected PPP expenses, especially in the DAC-GT program. However, this will largely be offset by expected PPP revenue throughout 2023. Rather than ignore this expected revenue and incorporate the uncollected PPP expense as of 2022 year-end into the 2024 funding requests, PG&E carries forward the expected amounts as of 2023 year-end into its 2024 funding request.

¹⁹ 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.

Table 7: DAC-GT 2024 PG&E Program Funding Request

DAC-GT GHG Funding Request

2024 Generation Costs	\$ 2,539,377
Subtract expected 2023 GHG carryover funds for Generation	\$ (2,924,609)
2024 DAC-GT GHG Funding Request	\$ -

DAC-GT PPP Funding Request

2024 20% Bill Discount	\$ 6,495,460
2024 Program Management Costs	\$ 511,078
2024 IT Costs	\$ 34,972
2024 Program Evaluator Costs	\$ 44,000
2024 DAC-GT PPP Budget Subtotal	\$ 7,085,510
Add 2023 Estimated PPP Deficit Spending/(True-up)	\$ 2,608,841
Add 2024 CCA Integration Costs	\$ 20,000
2024 DAC-GT PPP Funding Request	\$ 9,714,351

DAC-GT Total Funding Request

2024 DAC-GT Total Program Funding Request	\$ 9,714,351
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The 2024 DAC-GT budgets presented above assume that 2024 will have 12 months of full enrollment²⁰ under the DAC-GT program, with associated generation costs, and costs for the 20% discount. 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.

The 2024 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.²¹

²⁰ Advice Letter 6075-E-A, p. 3 Outlines the transfer of 2.5 MW in May of 2022 to Peninsula CleanEnergy DAC-GT program, adjusting the PG&E DAC-GT MW program cap to 52.32.

²¹ https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_5996-E.pdf

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 April 2021, PG&E filed and receiving approval to solicitation document updates in Advice Letter 6127-E before launching its Spring 2021 DAC-GT and CS-GT solicitation cycle in May 2021. PG&E later launched its Fall 2021 solicitation in December. Through these solicitations, PG&E reach a fully procured status for its DAC-GT program.²² Therefore, in 2022, PG&E completed both a Fall and Winter request for offer cycle only for CS-GT program capacity. Ultimately, neither solicitation request produced any acceptable CS-GT responses and as a result, CS-GT still has a small remaining MW balance left to procure.

The 2024 CS-GT budgets above reflect the current state of the CS-GT program: PG&E estimates that the first CS-GT projects will begin delivering energy and enrolling customers in 2023 and additional projects will begin delivering energy and enrolling customers in 2024. PG&E includes the estimated discount and generation costs associated with these new CS-GT projects in its 2023 and 2024 program spending forecasts and estimated budget request as shown below in Table 8.

²² The Commission later approved PG&E's request for approval of these DAC-GT contracts in Q4 2022 through AL 6775-E.

Table 8: CS-GT 2024 PG&E Program Funding Request**CS-GT GHG Funding Request**

2024 Generation Costs	\$ 228,570
Subtract 2023 available GHG carryover funds for Generation	\$ (5,310,663)
2024 CS-GT GHG Funding Request	\$ -

CS-GT PPP Funding Request

2024 20% Bill Discount	\$ 584,658
2024 Program Management Costs	\$ 511,545
2024 IT Costs	\$ 34,972
2024 Program Evaluator Costs	\$ 44,000
2024 CS-GT PPP Budget Subtotal	\$ 1,175,175
Add Forecasted 2023 PPP Deficit Spending/(True-up)	\$ (942,116)
2024 CS-GT PPP Budget Request	\$ 233,059

CS-GT Total Funding Request

2024 CS-GT Total Program Funding Request	\$ 233,059
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The total 2024 funding request is shown below Table 9.

Table 9: Total 2024 Funding Request

DAC-GT 2024 Funding Request	\$ 9,714,351
CS-GT 2024 Funding Request	\$ 233,059
DAC-GT and CS-GT 2024 Funding Subtotal	\$ 9,947,410
CCA 2023 PPP CCA Under-collection Request	\$ 811,662
Total 2024 Funding Request	\$ 10,759,072

Marketing, Education, and Outreach (ME&O) Plan***2024 DAC-GT "Green Saver" ME&O Plan***

Because the DAC-GT program was fully enrolled through the automatic process defined in Resolution E-4999 and D.20-07-008 and has a large waitlist, there is no ME&O activities planned in 2024 to attract and subscribe new participants. PG&E does conduct

other ME&O activities for awareness purposes only. These include compliance communications required by the Green-e Certification guidelines sent to enrolled customers.

PG&E's 2024 DAC-GT ME&O costs total \$17,140 (\$4,504 in labor and \$12,636 in non-labor), and these costs are embedded within its 2024 DAC-GT program management costs outlined in Table 7. PG&E's DAC-GT marketing budget also conforms to the 4 percent ME&O budget cap required by Resolution E-4999.

2024 CS-GT "Local Green Saver" ME&O Plan

PG&E plans to support CS-GT project sponsors with program enrollment by developing educational materials and resources which they may use to support the implementation of their outreach plans. Beginning in 2022 with the first CS-GT projects and continuing as projects come online in 2023 and 2024, these activities include:

- PG&E marketing labor to create marketing collateral and support CBOs' outreach, education, and enrollment activities.
- PG&E website which provides potential sponsors and customers with CS-GT program information and directs sponsors to resources to get started.
- Development of marketing collateral for sponsors and potential enrollees highlighting program eligibility, benefits, and steps to participate.

In addition to the activities outlined above, for each project PG&E must also approve CBO and sponsor outreach plans. 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 Certification guidelines.

The available budget for each community sponsor to execute their marketing plan is \$30,000 per project, as approved in prior budget ALs. These funds will be provided to community sponsors beginning in 2023 and continue thereafter based on each project's construction and enrollment progress.

PG&E's 2024 CS-GT ME&O costs total \$17,607 (\$4,504 in labor and \$13,103 in non-labor) for activities such as program manager time and dedicated marketing labor costs associated with conducting community sponsor marketing plan reviews, website updates, and communications for enrollment and Green-e Certification compliance. All costs associated with PG&E's CS-GT ME&O plan are embedded within its 2024 CS-GT program management costs outlined in Table 8. PG&E's CS-GT marketing budget also conforms to the 4 percent ME&O budget cap required by Resolution E-4999.

Due to changes in the expected timelines for CS-GT projects to come online, PG&E has shifted forward portions of the CS-GT ME&O budget outlined in its 2021 Budget AL 5749-E, such that components of this previous budget are not requested in duplication here in PG&E's 2024 Budget AL. These include the funding for CS-GT community-based organizations (CBO) and sponsor outreach and a program fact sheet.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than June 8, 2023, 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 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

Pursuant to General Order (GO) 96-B, Rule 5.2, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice letter submittal become effective June 18, 2023 (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 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 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) #: 6905-E-A

Tier Designation: 2

Subject of AL: Supplemental: 2024 Budget and Funding Request for the Disadvantaged Community Green Tariff (DAC-GT) and Community Solar Green Tariff (CS-GT) Programs

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 #: 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: 6/18/23

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 proposed¹: N/A

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

¹Discuss 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

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 Blaising Smith Wynne, P.C.
California Community Choice Association
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