



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: Clean Power Alliance of Southern California

Utility type:

☒ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Karen Schmidt

Phone #: (805) 507-0255 ext.1010

E-mail: kschmidt@cleanpoweralliance.org

E-mail Disposition Notice to: kschmidt@cleanpoweralliance.org

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

July 17, 2020

Advice Letter (AL) #: 0004

Tier Designation: 2

Subject of AL: Supplement to Advice 0004-E, Clean Power Alliance's Disadvantaged Communities
Green Tariff Program and Community Solar Green Tariff Program Advice Letter

Keywords (choose from CPUC listing):

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

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

Does AL replace a withdrawn or rejected AL?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

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information: N/A

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: N/A

Resolution required? ☒ Yes ☐ No

Requested effective date:

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

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

Name: Karen Schmidt
Title: Interim Director of External Affairs
Utility Name: Clean Power Alliance of Southern California
Address: 801 S. Grand Ave., Ste. 400
City: Los Angeles
State: California Zip: 90017
Telephone (xxx) xxx-xxxx: (805) 507-0255 ext.1010
Facsimile (xxx) xxx-xxxx:
Email: kschmidt@cleanpoweralliance.org

Name: Nancy Whang
Title: General Counsel
Utility Name: Clean Power Alliance of Southern California
Address: 801 S. Grand Ave., Ste. 400
City: Los Angeles
State: California Zip: 90017
Telephone (xxx) xxx-xxxx: (213) 595-7818
Facsimile (xxx) xxx-xxxx:
Email: nwhang@cleanpoweralliance.org

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 |
| Curtailable 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 | |



July 17, 2020

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

ADVICE 0004-E-A

RE: Supplement to Advice 0004-E, Clean Power Alliance's Disadvantaged Communities Green Tariff Program and Community Solar Green Tariff Program Advice Letter

EFFECTIVE DATE

Clean Power Alliance of Southern California ("CPA") requests that this Tier 3 Advice Letter ("Advice Letter") become effective after Commission approval.

TIER DESIGNATION

Pursuant to D.18-06-027, CPA's Advice Letter is submitted with a Tier 3 designation, which is the same Tier Designation as the original advice letter, Advice 0004-E.

PURPOSE

Clean Power Alliance of Southern California ("CPA") files this supplemental advice letter amending Advice 0004-E to reflect updates to its proposed approach to customer billing for Disadvantaged Communities Green Tariff Program ("DAC-GT") and Community Solar Green Tariff Program ("CSGT").

BACKGROUND

In its reply to CPA's Advice 0004-E filing, Southern California Edison ("SCE") submitted a reply on January 16, 2020, supporting CPA's cost recovery proposal but requesting that the Commission "direct CPA to use the billing information that SCE currently provides to calculate an accurate bill discount or direct SCE and CPA to develop a process to share delivery component bill data for only those commercial customers enrolled in CPA's CSGT."

After meeting with SCE, CPA has reached agreement with SCE that the two entities will develop a process by which SCE will share delivery bill data for commercial customers enrolled in CPA's CSGT program, and that the full bill discount will be applied to the CPA components of the customers' bills.

AMENDMENT TO ADVICE 0004-E

CPA has adjusted the language in section **2. Rate and discount design** on pages 10-11 of Advice 0004-E to address the issues raised by SCE in its January 16, 2020 reply letter. For DAC-GT and CSGT residential customers, CPA will calculate the full bill discount on the generation and delivery Otherwise Applicable Tariffs (“OATs”), and CPA will not require SCE to take any additional action. The redlined language is reflected below:

~~In order to expedite DAC-GT program launch and customer access to program benefits in advance of Southern California Edison’s (“SCE”) Customer Service Re-Platform (“CSRP”) implementation in PY 2020-2021, CPA proposes as an interim approach to~~ CPA will calculate the full bill discount for DAC-GT and CSGT residential customers based on the generation and delivery OATs, before taxes and fees, and ~~to~~ apply that discount as a line item credit to CCA charges on the customers’ monthly bills. This ~~interim~~ billing approach ~~does not require any additional action by SCE as it~~ will be solely implemented by CPA ~~and does not require any additional action by SCE.~~

For CSGT commercial customers, CPA and SCE will work collaboratively to establish an implementation process that allows SCE to transmit delivery charges electronically to CPA on a regular basis, so CPA can apply the discount on the bills for these customers. The redlined language is reflected below:

~~CPA expects to begin enrolling customers in CSGT programs starting in 2022. The CSGT program will involve provide discounts to Community Sponsors who are commercial customers on more diverse and complex IOU tariffs for which CPA may not be able to calculate discounts without additional billing information from SCE, including commercial tariffs for Community Sponsors that may include demand charges. CPA and SCE will work together to establish a process by which SCE will transmit delivery charges electronically for these customers on a regular schedule so that CPA can calculate and apply the full CSGT discount on the CCA side of customers’ bills on a timely basis each month or, if necessary, with a one month lag. CPA requests the ability to revisit this approach at a future date if CPA and SCE are not able to devise a workable implementation process. While CPA is able to calculate discounts on the entire bill for residential customers under the DAC-GT, doing so for commercial customers in the CSGT may not be practicable. Accordingly, beginning January 1, 2022, CPA proposes that SCE calculate and apply the discount to SCE’s portion of the customers’ bill while CPA continues to calculate and apply the discount to CPA’s portion of the bill. CPA therefore requests that the CPUC direct SCE to ensure that the systems and processes are in place for SCE to calculate and apply the customer bill discount on the SCE portion of the bill by no later than January 1, 2022.~~

CPA’s proposed ~~interim and long-term approaches are~~ approach is driven by the unique circumstances in CPA and SCE territories, in particular SCE’s **Customer Service Re-Platform (“CSRP”)** implementation, and may not be the appropriate or best solutions for the billing of customer discounts in other IOU service territories.

SCE has provided a letter indicating their support for CPA's amended Advice Letter, included as Attachment 1 to this Advice Letter.

NOTICE

CPA served its original Advice Letter 0004-E on December 27, 2019. Pursuant to General Order 96-B, protests were due 20 days after the filing of CPA's original advice letter on January 16, 2020. All correspondence regarding this advice letter should be sent by letter or transmitted electronically to the attention of:

Karen Schmidt
Interim Director of External Affairs
Clean Power Alliance
801 S. Grand, Suite 400
Los Angeles, CA 90017
Email: kschmidt@cleanpoweralliance.org

In accordance with General Rule 4 of GO 96-B, CPA is serving copies of this advice filing to the interested parties shown on the R. 14-07-002 service list. For changes to these service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

END OF AL

Attachment 1

**SCE Letter of Support for
CPA Supplemental Advice Letter 0004-E-A**

July 17, 2020

Clean Power Alliance
Karen Schmidt, Interim Director of External Affairs
555 W. 5th Street, 35th Floor
Los Angeles, CA 90013

Dear Ms. Schmidt,

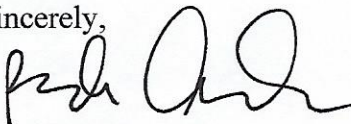
Southern California Edison Company (SCE) supports the supplemental advice letter of Clean Power Alliance (CPA), amending their Advice (AL) 0004-E, requesting approval to implement CPA's Disadvantaged Communities Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT) programs.

On January 16, 2020, SCE submitted its Reply to CPA's DAC-GT and CSGT Programs requesting that the Commission "direct CPA to use the billing information that SCE currently provides to calculate an accurate bill discount or direct SCE and CPA to develop a process to share delivery component bill data for only those commercial customers enrolled in CPA's CSGT."

In a conference call on July 2, 2020, and as stated in CPA's supplemental advice letter, CPA and SCE reached an agreement in which, for residential customers on CPA's DAC-GT and CSGT residential customers, CPA will calculate the full bill discount on the generation and delivery Otherwise Applicable Tariffs ("OATs"), and CPA will not require SCE to take additional action. For CSGT commercial customers, CPA and SCE agreed to work collaboratively to establish an implementation process that allows SCE to transmit total delivery charges electronically to CPA on a monthly basis to enable CPA to apply the discount on the generation and delivery portions of the bills for these customers.

SCE supports the efforts of CPA to develop and implement their own DAC-GT and CSGT programs as described in the advice letter and revised in the supplemental advice letter and looks forward to working with CPA in the future.

Sincerely,



Brandi Anderson

Director, Revenue Services Organization