



November 12, 2021

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

CPA Advice Letter 0012-E

SUBJECT: Clean Power Alliance of Southern California's Update to its Tariffs for the Disadvantaged Communities Green Tariff Program and Community Solar Green Tariff Program

In compliance with California Public Utilities Commission's ("Commission") Resolution E-4999¹, Clean Power Alliance of Southern California ("CPA") respectfully submits this Advice Letter ("AL"), which details the following changes to its Disadvantaged Communities Green Tariff Program ("DAC-GT") and Community Solar Green Tariff Program ("CSGT") tariffs. The revised tariffs are attached hereto as Attachment A.

PURPOSE

Pursuant to Resolution E-4999, CPA submits this AL to update its Schedule DAC-GT, Disadvantaged Community Green Tariff Program ("DAC-GT Tariff"), and Schedule CSGT, Community Solar Green Tariff Program ("CSGT Tariff") to reflect the new version of the California Communities Environmental Health Screening Tool's ("CalEnviroScreen" or "CES") thresholds.

In addition to the CES updates, CPA also proposes updates to its tariff that are either no longer applicable and/or updated to provide additional clarity regarding program eligibility as it relates to the updates to CalEnviroScreen.

¹ Resolution E-4999 at pages 38-39 and Ordering Paragraph ("OP") 1(p).

BACKGROUND

On June 21, 2018, the Commission issued D.18-06-027 (“Decision”) adopting three new programs to promote the installation of renewable generation among residential customers in DACs,² as directed by the California Legislature in Assembly Bill (AB) 327 (Perea), Stats. 2013, ch 611. Pursuant to the Decision, Community Choice Aggregators (“CCAs”) may develop and implement their own DAC-GT and CSGT programs.³ CCA programs must abide by all DAC-GT or CSGT rules and requirements adopted in the Decision.⁴ The Decision provides that CCAs must file a Tier 3 advice letter to implement the CCA DAC-GT and CSGT programs and allows CCAs to combine DAC-GT and CSGT proposals into one Tier 3 advice letter.⁵ Resolution E-4999 further stipulates that such advice letters must be filed on or before January 1, 2021 or the capacity allocated to the CCA will be reverted to an IOU or another CCA.⁶

CPA filed its Tier 3 Advice Letter on December 27, 2019, to create DAC-GT and CSGT programs consistent with all provisions in D.18-06-027, D.18-10-007,⁷ Resolution E-4999, as well as guidance received from the Commission’s Energy Division. Subsequently, the Commission issued Resolution E-5102 on November 5, 2020, and approved CPA’s DAC-GT and CSGT program Advice Letter.

Resolution E-4999 orders the IOUs to “update program eligibility rules to reflect the new CalEnviroScreen thresholds by filing a Tier 1 advice letter within 30 days of the release of the new version.”⁸ In addition, Resolution E-4999 addressed, amongst other things, “aspects of program implementation that were inconsistent across the IOUs, that contradicted direction provided in the Decision, or that warranted clarification.”⁹

On October 13, 2021, the Office of Environmental Health Hazard Assessment, under the California Environmental Protection Agency, implemented its latest version of the CalEnviroScreen tool (version 4.0) to help identify California communities that are disproportionately burdened by multiple sources of pollution.

² DACs are defined under D.18-06-027 as communities that are identified in the CalEnviroScreen 3.0 as among the top 25 percent of census tracts statewide, plus the census tracts in the highest five percent of CalEnviroScreen’s Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data. Program eligibility is subject to be updated based on the latest version of CalEnviroScreen (pages 38-39).

³ D.18-06-027 at page 104, OP 17. The third program established by the Decision is the DAC-Single-family Affordable Solar Housing program which is to be managed by a statewide program administrator.

⁴ *Id.* at page 104, OP 17.

⁵ *Id.* at page 56, FN 36.

⁶ Resolution E-4999 at page 54, Findings and Conclusions 19.

⁷ D.18-10-007 issued on October 18, 2018, corrected and clarified certain matters in the D.18-06-027 including application of the DAC-GT and CSGT customer bill discount and the definition of “5 miles” with regard to maximum distance between CSGT facilities and subscribing customers.

⁸ Resolution E-4999 at page 38.

⁹ *Id.*

SUMMARY OF TARIFF CHANGES

1. Schedule DAC-GT, Disadvantaged Community Green Tariff Program

a. CES Changes

In compliance with Resolution E-4999, CPA removes the “CalEnviroScreen 3.0” language to “the latest version of CalEnviroScreen” in the following sections of its DAC-GT Tariff:

- Terms and Conditions – Customer Eligibility

b. Other Changes

Customer Eligibility

CPA proposes to add the following language to paragraph 1(c) in the Terms and Conditions section of the DAC-GT Tariff, clarifying that the customer can stay on the program as long as their situation has not changed (changes in underline):

In the event the census tract in which a customer resides is not scored as a top 25 percent DAC in a subsequent version of the CalEnviroScreen tool or as one of the census tracts in the top 5 percent of pollution burden, the customer may retain their eligibility for DAC-Green Tariff, so long as such customer continues to meet all other eligibility criteria.

2. Schedule CSGT, Community Solar Green Tariff Program

In compliance with Resolution E-4999, CPA removes the “CalEnviroScreen 3.0” language to “the latest version of CalEnviroScreen” in the following sections of its CSGT Tariff:

a. CES Changes

- Terms and Conditions – Customer Eligibility

b. Other Changes

CSGT Program Capacity

CPA updates the CSGT program capacity amount from 3.13 megawatts (“MW”) to 3.37 MW pursuant to a capacity transfer to CPA as approved by the Commission in Resolution E-5130.¹⁰

¹⁰ Resolution E-5130, pages 7-8.

Customer Eligibility

CPA proposes to add the following language to paragraph 1(b) in the Terms and Conditions section of the CSGT Tariff, clarifying that the customer can stay on the program as long as their situation has not changed (changes in underline):

In the event the census tract in which a customer resides is not scored in a subsequent version of the CalEnviroScreen tool as a top 25 percent DAC or as one of the census tracts in the top 5 percent of pollution burden, the customer may retain their eligibility for CS-Green Tariff, so long as such customer continues to meet all other eligibility criteria.

ATTACHMENTS

This AL contains the following attachment:

Attachment A: Schedule DAC-GT, Disadvantaged Community Green Tariff Program and Schedule CSGT, Community Solar Green Tariff Program

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.1, this advice letter is submitted with a Tier 1 designation.

EFFECTIVE DATE

This AL will become effective on November 12, 2021, the same day as the date submitted.

NOTICE

Anyone wishing to protest this AL may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received by the Energy Division and CPA no later than 20 days after the date of this AL. Protests should be submitted to:

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

In addition, protests and all other correspondence regarding this AL should be sent by letter or transmitted electronically to the attention of:

C.C. Song
Director of Regulatory Affairs
Clean Power Alliance of Southern California
801 S. Grand Ave., Suite 400
Los Angeles, CA 90017
Email: csong@cleanpoweralliance.org

Francis Choi
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There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

In accordance with General Rule 4 of GO 96-B, CPA is serving copies of this AL to the interested parties shown on the R. 14-07-002 and A.16-07-015 service lists. Pursuant to the March 20, 2020 order from Executive Director waiving the hard copy filing requirements for the AL pursuant to GO 96-B Rule 1.3, CPA will not be filing a hard copy of this AL. 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.

ATTACHMENT A

SCHEDULE DAC-GT, DISADVANTAGED COMMUNITY GREEN TARIFF PROGRAM

AND

SCHEDULE CSGT, COMMUNITY SOLAR GREEN TARIFF PROGRAM¹

Clean Power Alliance of Southern California Disadvantaged Communities Green Tariff Program

The purpose of the Disadvantaged Communities Green Tariff Program (“DAC-Green Tariff Program”) is to provide eligible customers residing in disadvantaged communities with a bill credit from having Clean Power Alliance of Southern California (“CPA”) procure 100 percent renewable resources from qualified renewable generating facilities in disadvantaged communities (“Qualified Facilities”) to serve their electricity needs.

APPLICABILITY

This program is available to residential CPA customers who are eligible for the California Alternate Rates for Energy (“CARE”) or Family Electric Rate Assistance (“FERA”) program and reside within a Disadvantaged Community (“DAC”) as defined in the Terms and Conditions below.

Qualified Facilities are defined as new Renewable Portfolio Standard (“RPS”) eligible generating facilities with a nameplate rated generating capacity between 500 kW to 20 MW that are located within a DAC in Southern California Edison’s (“SCE”) service territory and that supply energy to CPA via a Power Purchase Agreement for the purposes of meeting customer subscriptions under this program. Prior to new qualified facilities coming online, CPA will serve DAC-Green Tariff Program customers on an interim basis utilizing existing resources that otherwise meet all of the requirements of the DAC-Green Tariff Program. Once the new DAC-Green facilities come online, CPA’s DAC-Green Tariff customer subscriptions will be served by these projects.

This program is available to customers on a first-come, first-served basis until customer subscriptions reach 12.19 megawatts (“MW”) (CPA’s DAC-Green Tariff Program Cap). Enrollment in the DAC-Green Tariff Program will occur as specified in the Terms and Conditions below. Once CPA reaches its DAC-Green Tariff Program Cap, a wait list will be

¹ The DAC-GT and CSGT schedule forms in this attachment are provided for informational purposes to further support the Commission’s review of this AL. These documents are pending CPA Board review and approval and may be updated to reflect the disposition of the CPA Board, but are provided herein as examples of the documents CPA will utilize in implementing the programs.

maintained for new subscriptions. When program capacity becomes available, CPA will enroll new eligible customers on a first-come, first-served basis.

This program is not available to customers served under master metered schedules (i.e., Schedules DM, DMS-1, DMS-2, DMS-3), non-CARE/FERA eligible rates such as TOU-EV-1, Net Energy Metering rates, or the Community Solar Green Tariff, or to Direct Access customers or SCE bundled customers.

This program will be available for customer participation as of [date TBD, to be specified by CPA Board of Directors].

RATES AND CREDITS

All customers enrolling in CPA's DAC-Green Tariff Program rate will receive 100% renewable electricity generation priced the same as CPA's Clean Power rate tier and will remain on their current applicable SCE rate schedule(s) for transmission and delivery charges. All charges, credits, and provisions of a customer's otherwise applicable tariffs ("OAT") apply.

The total amount billed to the customer will be adjusted by applying a credit to the customer's CPA charges equivalent to a 20 percent discount on their total bill under the OAT (including CPA generation charges, SCE transmission and distribution charges, and SCE CCA-CRS charges) prior to the application of state and local taxes.

Existing CARE or FERA customers, and customers eligible for CARE or FERA who enroll in CARE or FERA in the process of signing up for DAC-Green Tariff, will retain their CARE or FERA discount and the 20 percent DAC-Green Tariff credit will be applied to the customer's CARE or FERA rate.

TERMS AND CONDITIONS

1. **Customer eligibility.** To enroll in this program customers must meet the following eligibility criteria:
 - a. **CPA enrollment:** Program participants must be residential CPA customers. SCE bundled customers and customers served by Direct Access providers are not eligible to participate in this program.
 - b. **CARE/FERA eligibility:** Customers must be eligible for CARE or FERA program. If a customer is not already enrolled in CARE or FERA they may enroll in CARE or FERA prior to signing up for the DAC-Green Tariff program. If they elect not to enroll in CARE or FERA, they will be required to certify their eligibility for one of these programs as part of the process of enrolling in the DAC-Green Tariff.
 - c. **Disadvantaged community:** The customer's service address must be located in a DAC, identified by the latest adopted version of CalEnviroScreen as scoring among the top 25 percent of census tracts statewide, or census tracts scoring in the

highest 5 percent of the CalEnviroScreen's Pollution Burden, but that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data. In the event the census tract in which a customer resides is not scored as a top 25 percent DAC in a subsequent version of the CalEnviroScreen tool or as one of the census tracts in the top 5 percent of pollution burden, the customer may retain their eligibility for DAC-Green Tariff, so long as such customer continues to meet all other eligibility criteria.

2. **Participation in Demand Response programs.** Customers served by this program can concurrently participate in any Demand Response ("DR") Programs for which they are otherwise eligible. All DR payments and credits are based on a customer's metered usage and are not impacted by participation in this program.
3. **Ineligible rates.** Customers served under the following rate schedules cannot concurrently participate in the DAC-Green Tariff Program:
 - a. Net Energy Metering ("NEM") schedules or RES-BCT schedules.
 - b. Other 100% renewable energy rates including CPA's 100% Green Power rate and Community Solar-Green Tariff Program.
 - c. Customers served under a master meter rate schedule (i.e., Schedules DM, DMS-1, DMS-2, or DMS-3).
 - d. TOU-EV-1 or other non-CARE/FERA eligible rates.
 - e. Non-residential rate schedules.
4. **Customer enrollment and term.** After the Program start date, service under this program will become effective within two billing periods after CPA receives a request from a customer to enroll in this program and CPA has confirmed that the customer meets program eligibility requirements.

There is no minimum length of time that a customer must take service under this program. There is also no termination fee associated with de-enrolling from the DAC-Green Tariff Program. In the event a customer elects to no longer receive service under this program, the change will become effective no later than two billing periods after the date that CPA receives the customer's request to de-enroll from the DAC-Green Tariff Program. Customers are eligible to remain on the DAC-Green Tariff Program for a period of up to 20 years from the date they first began service under this program.

In the event that a customer turns off service at their current address and moves to a new location, the customer will need to recertify eligibility at the new location for service under this program. If they still meet the eligibility requirements the customer will retain their status as a program participant as long as the customer's turn-on date at the new location is within 90 days of the final billing date at their original location and CPA receives the customer application within 90 days of the customer's turn-on date.

Customers who, after enrollment into the DAC-Green Tariff Program, become ineligible for CARE or FERA will be de-enrolled from this program.

5. **Maximum subscription per customer.** Enrollment in this program is capped at 2 MW for any single customer.
6. **Metering.** All customers must be metered according to the requirements of their OAT.

**Clean Power Alliance of Southern California
Community Solar Green Tariff Program**

The purpose of the Community Solar Green Tariff Program (“CS-Green Tariff Program”) is to provide eligible customers residing in disadvantaged communities with a bill credit from having Clean Power Alliance of Southern California (“CPA”) procure 100 percent renewable energy from qualifying Community Solar facilities (“CS Facilities”) located within their communities to serve their electricity needs.

APPLICABILITY

This program is available to CPA residential customers who:

1. are eligible for the California Alternate Rates for Energy (“CARE”) or Family Electric Rate Assistance (“FERA”) program (“Qualifying Customers”);
2. reside in a census tract that is within a Disadvantaged Community (“DAC”) as defined in the Terms and Conditions below; and
3. reside in a census tract that is within five miles of a CS Facility as defined below.

Once 50 percent of a CS Facility’s output is subscribed by Qualifying Customers, this program is also available to:

1. Residential customers who are not eligible for the CARE or FERA program but reside within a DAC and in a census tract that is within five miles of the CS facility (“Non-qualifying Customers”); and
2. Community Sponsors, as defined in the Community Sponsor section of this tariff.

This program is available to customers until total program capacity of 3.37 megawatts (“MW”) (CPA’s CS-Green Tariff Program Cap) is reached, however, an individual CS Facility may be smaller and enrollment toward each CS Facility will be capped at the capacity of that facility. Once CPA’s CS-Green Tariff Program Cap is reached for one or all CS Facilities, a wait list will be maintained for new subscriptions. When program capacity becomes available, CPA will enroll new eligible customers on a first-come, first-served basis with priority given to Qualifying Customers.

Customers served under a master metered schedule (i.e., Schedules DM, DMS-1, DMS-2, and DMS-3) are eligible for this program once 50 percent of the CS Facility output is subscribed with Qualifying Customers. This program is not available to customers served under a Net Energy Metering rate schedule, or to Direct Access or SCE bundled customers.

This program will be available for Qualifying Customer participation once a CS facility has achieved commercial operation and for Non-qualifying Customers once the subscription rate for Qualifying Customers reaches the 50% threshold.

COMMUNITY SOLAR FACILITIES

For the purpose of this tariff, a CS Facility is defined as a Renewable Portfolio Standard (“RPS”) eligible generating facility that is located within a DAC and within five miles of the census tracts in which subscribing customers reside. CS Facilities may have a nameplate rated generating capacity no larger than 3 MW for any one project. The developer of a CS Facility must enter into a Power Purchase Agreement (“PPA”) with CPA for the sale and purchase of the power produced by the facility and is responsible for developing and operating the CS Facility and partnering with one or more Community Sponsors for the project (see below for more information). Customers served by this program are not parties to the PPA and are not third-party beneficiaries to the PPA.

A CS Facility will retain its eligibility to serve customers under this program throughout the life of that project, even if the local qualified DAC designations change in subsequent iterations of CalEnviroScreen.

COMMUNITY SPONSORS

Each CS facility must have one or more Community Sponsors. Community Sponsor are local non-profit community-based organizations or local government entities, including schools, located in CPA’s service territory. Community Sponsors must demonstrate community involvement and awareness by sponsoring a CS-Green Tariff project on behalf of the residents.

A Community Sponsor located within a DAC and in a census tract that is within five miles of the CS facility may take service under this program and is eligible for a 20 percent bill credit for usage up to 25 percent of the project’s estimated output, not to exceed the Community Sponsor’s energy needs. Any usage above 25 percent of the project’s energy output will be billed at the Community Sponsor’s OAT and is not eligible for the 20 percent bill credit. The 20 percent bill credit will apply to the eligible portion of the Community Sponsors bill once 50 percent of the project’s capacity has been subscribed by Qualified Customers. Multiple Community Sponsors can sponsor a single CS-Green Tariff project and share in the 20 percent bill credit up to 25 percent of the project’s energy output provided that all sponsors meet the eligibility requirements above.

RATES AND CREDITS

All customers enrolling in the CS-Green Tariff will receive 100% renewable electricity generation priced at CPA’s Clean Power rate and will remain on their current applicable SCE rate schedule(s) for transmission and delivery charges. All charges, credits, and provisions of a customer’s otherwise applicable tariffs (“OAT”) apply.

The total amount billed to the customer each month will be adjusted by applying a 20 percent credit to the customer’s CPA and SCE charges under the OAT (including CPA generation charges, SCE transmission and distribution charges, and SCE CCA-CRS charges) prior to the application of state and local taxes and fees.

If a customer who is eligible for CARE or FERA enrolls in CARE or FERA in the process of signing up for this Schedule, the 20 percent credit will be applied to the customer's new CARE or FERA bill.

Community Sponsors taking service under this program will be eligible for a 20 percent bill credit on load up to 25 percent of the CS Facility's capacity. Any usage above 25 percent of the project's energy output will be billed at the Community Sponsor's OAT and not subject to the 20 percent bill credit. The Community Sponsor will receive the 20 percent bill credit will once 50 percent of the project's capacity has been subscribed by qualified customers.

TERMS AND CONDITIONS

1. **Customer eligibility.** To enroll in this program customers must meet the following eligibility criteria:
 - a. **CPA enrollment:** To receive service under this program participants must be CPA customers. SCE bundled customers and customers served by Direct Access providers are not eligible to participate in this program.
 - b. **Disadvantaged community:** The customer's service address must be located in a DAC, identified by the latest adopted version of CalEnviroScreen as scoring among the top 25 percent of census tracts statewide, or census tracts scoring in the highest 5 percent of the CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

In the event the census tract in which a customer resides is not scored in a subsequent version of the CalEnviroScreen tool as a top 25 percent DAC or as one of the census tracts in the top 5 percent of pollution burden, the customer may retain their eligibility for CS-Green Tariff, so long as such customer continues to meet all other eligibility criteria.
 - c. **Proximity to CS Facility:** Customers must reside in a DAC census tract that is within five miles of a CS Facility.
 - d. **CARE/FERA eligibility:** The first 50 percent of the output of a CS Facility will be reserved for residential customers who meet the other eligibility requirements and are eligible for the CARE or FERA program ("Qualifying Customers"). If a customer is not already enrolled in CARE or FERA they may enroll in CARE or FERA prior to signing up for the DAC-Green Tariff program. If they elect not to enroll in CARE or FERA, they will be required to certify their eligibility for one of these programs as part of the process of enrolling in the CS-Green Tariff.
 - e. **Non-qualifying Customers:** After 50 percent of the output of a CS Facility has been subscribed by Qualifying Customers, non-qualifying residential customers as defined in the Applicability section of this tariff, including customers served under a master meter rate schedule (i.e., Schedules DM, DMS-1, DMS-2, or

DMS-3), may enroll in the program and receive the 20 percent CS-Green Tariff credit.

- f. **Community Sponsors:** After 50 percent of the output of a CS Facility has been subscribed by Qualifying Customers, Community Sponsors may enroll eligible service accounts and receive the 20 percent CS-Green Tariff credit, subject to the conditions and limitations listed in the Community Sponsors section of this tariff.
2. **Participation in Demand Response programs.** Customers served by this program can concurrently participate on any Demand Response (“DR”) Programs for which they are otherwise eligible. All DR payments and credits are based on a customer’s metered usage and are not impacted by participation in this program.
3. **Ineligible rates.** Customers served under the following rate schedules cannot concurrently participate in the CS-Green Tariff Program:
 - a. Net Energy Metering (“NEM”) and RES-BCT schedules.
 - b. CPA’s Disadvantaged Communities Green Tariff Program.
4. **Customer enrollment and term.** After a CS Facility has achieved commercial operation, service under this Schedule shall become effective within two billing periods after CPA receives an enrollment request from a customer and CPA has confirmed that the customer meets program eligibility requirements.

In the event a customer elects to no longer receive service under this program, the change will become effective no later than two billing periods after the date that CPA receives the customer’s request to de-enroll from the CS-Green Tariff Program.

In the event that a customer moves and turns off service at their current address and moves to a new location, the customer will need to recertify eligibility at the new location for service under this program. The customer will retain their status as a program participant as long as the customer meets all eligibility criteria, program capacity is available, the customer’s turn-on date at the new location is within 90 days of the final billing date at his/her previous location and the application is received by CPA within 90 days of the turn-on date.

Service under this program will automatically terminate at the start of the next billing period if the PPA between CPA and the developer of the CS facility to which the customer is subscribed is terminated or the delivery term ends.
7. **Maximum subscription per customer.** The load served by CPA to an individual customer under this program (subscription) is capped at 2 MW of nameplate rated generating capacity from a CS Facility. Customers cannot be subscribed to more than one CS Facility at any time.
8. **Metering.** All Customers must be metered according to the requirements of their OAT.