



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

☐ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person:

Phone #:

E-mail:

E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

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Does AL replace a withdrawn or rejected AL?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:

Summarize differences between the AL and the prior withdrawn or rejected AL: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:

No. of tariff sheets:

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:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

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:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
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State: Zip:
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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	



February 1, 2023

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

Advice Letter CPA 0021-E

SUBJECT: Clean Power Alliance of Southern California's Disadvantaged Communities Green Tariff Program and Community Solar Green Tariff Program Budget Estimates for 2024

PURPOSE

Pursuant to California Public Utilities Commission's ("Commission") Resolution E-4999,¹ Resolution E-5102,² Resolution E-5125,³ and Resolution E-5212,⁴ Clean Power Alliance of Southern California ("CPA") respectfully submits this Advice Letter ("AL") for approval of its program budget estimates and marketing, education, and outreach ("ME&O") plan for CPA's Disadvantaged Communities Green Tariff ("DAC-GT") and Community Solar Green Tariff ("CSGT") programs.

BACKGROUND

On June 21, 2018, the Commission issued Decision ("D.") 18-06-027 adopting new programs to promote the installation of renewable generation among residential customers in Disadvantaged Communities ("DACs"), as directed by the California Legislature in Assembly Bill 327 (Perea), Stats. 2013, Ch. 611. Pursuant to D.18-06-027, Community Choice Aggregators ("CCAs") may develop and implement their own DAC-GT and CSGT programs. CCA programs must abide by all DAC-GT or CSGT rules and requirements adopted in D. 18-06-027. D. 18-06-027 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. 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. Accordingly, 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, Resolution E-4999, and guidance received from the Commission's Energy Division.

¹ Commission Resolution E-4999 at 67 (Ordering Paragraph ("OP") 2) and 68 (OP 4).

² Commission Resolution E-5102 at 7-8.

³ Commission Resolution E-5125 at 11 (OPs 2 and 3).

⁴ Commission Resolution E-5212 at 15 (OP 4).

Subsequently, the Commission approved CPA’s DAC-GT and CSGT programs by issuing Resolution E-5102 on November 5, 2020. Resolution E-5102 requires CPA to “submit an annual program budget estimate and an annual ME&O plan by February 1st of every year, starting in 2021, for the next program year.”⁵ Resolution E-4999 provides similar reporting and budgeting requirements and outlines the descriptions to be provided for each budget line item.⁶ In Resolution E-5125, the Commission ordered program administrators to submit any above-cap program administration costs and ME&O expenses with an accompanying rationale for why an exceedance is warranted in a tier 2 advice letter. In Resolution E-5212, the Commission ordered program administrators to update their marketing plans to reflect updated program eligibility rules. Accordingly, CPA files this tier 2 AL in compliance with Resolution E-4999, Resolution E-5102, Resolution E-5125, and Resolution E-5212 and submits the annual budget estimate detailed herein for Commission approval.

DISCUSSION

1. Previous Program Year Balances

On February 1, 2021, CPA submitted Advice Letter 0008-E, which was subsequently modified by supplemental Advice Letter 0008-E-A, dated as of March 1, 2021 (collectively, the “2021 Budget AL”), which included budget projections for CPA’s DAC-GT and CSGT programs for Program Year (“PY”) 2021 and PY 2022. The proposed budgets set forth in the 2021 Budget AL were subsequently approved by the Commission. A summary of CPA’s approved PY 2022 budget is presented below in Table 1.

Table 1. CPA’s Approved PY 2022 Budget

Category	DAC-GT	CSGT	Overall Total
Above Market Generation Costs	\$1,571,524	\$35,557	\$1,607,081
20% Bill Discount	\$1,119,006	\$12,328	\$1,131,334
Program Administration	\$362,544	\$362,544	\$725,088
Marketing, Education & Outreach	\$355,000	\$155,000	\$510,000
Independent Evaluator	\$0	\$0	\$0
Total	\$3,408,073	\$565,429	\$3,973,502

⁵ Resolution E-5102 at 8.

⁶ Resolution E-4999 at 8 and OPs 2-4.

CPA's PY 2022 approved budget, actual expenses, and unspent balance are indicated in Table 2 below.

Table 2. CPA's PY 2022 Expenses and Unspent Balance⁷

	DAC-GT	CSGT	Total
Above Market Generation Costs	\$280,967	\$0	\$280,967
20% Bill Discount	\$697,434	\$0	\$697,434
Program Administration	\$176,106	\$176,106	\$352,212
Marketing, Education & Outreach	\$278,877	\$62,846	\$341,724
Independent Evaluator	\$0	\$0	\$0
PY 2022 Actual Expenses Total	\$1,433,384	\$238,952	\$1,672,336
PY 2022 Approved Program Budget	\$3,408,073	\$565,429	\$3,973,502
PY 2022 Unspent Balance	\$1,974,690	\$326,477	\$2,301,167

CPA's figures include all realized and accrued expenses for 2022 as of the date of this AL.⁸ CPA anticipates receipt of additional invoices that may alter the calculation of the PY 2022 expenses and reserves for further adjustments to this figure along with corresponding accounting treatment, which shall be reflected in a subsequent budget advice letter if necessary.

Additionally, CPA submits adjustments to its PY 2021 expenses, which were initially submitted in CPA AL 0014-E.⁹ Table 3 details two adjustments that account for realized expenses that CPA was unable to calculate until after the February 1, 2022 submission deadline for its prior budget advice letter, including one accrued expense (as of the date of the submission of AL 0014-E) for marketing, education, and outreach that was not realized. As a result of this update, CPA will credit \$17,305 to DAC-GT program expenses and requests an additional \$9,281 in CSGT program expenses. This updated amount will be incorporated into the netting of unspent funds, remittances, and the PY 2024 budget as calculated in Table 5 below.

[Continues on next page]

⁷ Reflects realized and accrued expenses for PY 2022 as of February 1, 2023.

⁸ "Above Market Generation Costs" refers to "net renewable resource costs in excess of the otherwise applicable class average generation rate that will be used to calculate DAC-GT and CSGT customers' bills" (Resolution E-4999, at 27, FN 61).

⁹ CPA AL 0014-E at 3.

Table 3. CPA's Adjusted DAC-GT and CSGT Expenses for PY 2021

Category	DAC-GT Submitted Amount	DAC-GT Realized Amount	DAC-GT Adjusted Difference	CSGT Submitted Amount	CSGT Realized Amount	CSGT Adjusted Difference
Above Market Costs	\$280,967	\$280,967	\$0	\$0	\$0	\$0
Bill Discount	\$119,515	\$119,505	\$10	\$0	\$0	\$0
Program Administration	\$111,138	\$120,419	\$(9,281)	\$111,138	\$120,419	\$(9,281)
ME&O	\$411,930	\$385,354	\$26,576	\$10,756	\$10,756	\$0
Total	\$923,550	\$906,244	\$17,305	\$121,894	\$131,175	\$(9,281)

2. Program Budget Estimates for Program Year 2024

For PY 2024, CPA is proposing a total budget of \$3,605,243 for the DAC-GT and CSGT programs. This includes \$3,135,371 for DAC-GT and \$469,872 for CSGT. Table 4 shows the proposed program budgets using the budget categories required in Resolution E-4999. The specific budget categories are discussed further below along with detailed budget information for both programs.

Table 4. CPA's Proposed Budgets for DAC-GT and CSGT for PY 2024

Category	DAC-GT	CSGT	Total
Above Market Generation Costs	\$930,317	\$69,377	\$999,694
20% Bill Discount	\$1,924,346	\$113,288	\$2,037,633
Program Administration	\$255,208	\$255,208	\$510,416
ME&O	\$25,500	\$32,000	\$57,500
Independent Evaluator	\$0	\$0	\$0
PY 2024 Budget Total	\$3,135,371	\$469,872	\$3,605,243

For PY 2024, CPA requests \$1,656,292 in total remittances, which shall be the total amount of CPA's requested PY 2024 budget less CPA's PY 2022 unspent funds and accounting for PY 2021 budget adjustments. Of this amount, CPA requests \$33,820 to be applied toward Above Market Generations Costs and \$1,630,496 to be applied to the remaining budget items, as detailed in Table 5 below. CPA's PY 2022 unspent funds related to DAC-GT Above Market Generations Costs exceeds its requested PY 2024 budget for DAC-GT Above Market Generations Costs in the amount of \$360,240. CPA will use \$930,317 from PY 2022 unspent DAC-GT Above Market Generations Costs to offset its PY 2024 budget request for DAC-GT Above Market Generations Costs and will apply \$360,240 (the remaining amount of the PY 2022 unspent funds for DAC-GT Above Market Generations Costs) to its future PY 2025 DAC-GT Above Market Generations Costs budget request. CPA accordingly requests no remittances for PY 2024 DAC-GT Above Market Generations Costs.

Table 5. CPA's Remittance Request for DAC-GT and CSGT for PY 2024

Category	DAC-GT	CSGT	Total
<i>Above Market Generation Costs</i>			
Generation Cost Delta	\$930,317	\$69,377	\$999,694
Subtract PY 2022 Unspent Funds	\$1,290,557	\$35,557	\$1,326,114
Net Difference of PY 2024 Request and PY 2022 Unspent Funds	(\$360,240)	\$33,820	(\$326,420)
Remittance Request for Above Market Generation Costs	\$0	\$33,820	\$33,820
<i>Other Budget Items</i>			
20% Bill Discount	\$1,924,346	\$113,288	\$2,037,633
Program Administration	\$255,208	\$255,208	\$510,416
Marketing, Education & Outreach	\$25,500	\$32,000	\$57,500
Independent Evaluator	\$0	\$0	\$0
Other Budget Items Subtotal	\$2,205,054	\$400,496	\$2,605,549
Subtract PY 2022 Unspent Funds	\$684,133	\$290,920	\$975,053
Remittance Request for Other Budget Items	\$1,520,921	\$109,576	\$1,630,496
<i>Total Remittance Request</i>			
PY 2024 Budget Total	\$3,135,371	\$469,872	\$3,605,243
Subtract PY 2021 Budget Corrections	\$17,305	(\$9,281)	\$8,024
Subtract PY 2022 Unspent Funds	\$1,614,450 ¹⁰	\$326,477	\$1,940,927
PY 2024 Remittance Request	\$1,503,616	\$152,676	\$1,656,292

a. Budget Details

Resolution E-4999 requires that annual budget submissions include the following:¹¹

- Line items for Above Market Generation Costs
- 20 percent bill discount for all participating customers (“20 Percent Bill Discount” or “20% Bill Discount”)

¹⁰ This amount is the sum of \$930,317 to be applied from unspent funds that were previously allocated for PY 2022 DAC-GT Above Market Generation Costs (the remaining \$360,240 of unspent funds in this category will be applied in the PY 2025 budget request) and \$684,133 from unspent funds related to other PY 2022 DAC-GT budget items.

¹¹ Resolution E-4999 at 67 (OP 2).

- Program administration costs (“Program Administration Costs”)
- ME&O funding (“ME&O Costs”)
- Independent evaluator

CPA addresses these five requirements in the following subsections.

i. Above Market Generation Costs

CPA entered into its first power purchase agreement in connection with a DAC-GT project (such project, the “Minneola Project”) on September 3, 2021, with an initial delivery date for project energy scheduled to begin on December 31, 2024.¹² CPA subsequently entered into five power purchase agreements on December 2, 2022 for five new projects, each with an initial delivery date for project energy scheduled to begin on December 30, 2023, with an aggregate nameplate capacity of 5.92 MWs.¹³ DAC-GT customers will continue to be served by interim DAC-GT resources in PY 2024 in addition to generation from operational projects.

CPA anticipates having two new CSGT projects online by December 21, 2023, with an aggregate nameplate capacity of 0.67 MW.¹⁴

The Above Market Generation Costs for DAC-GT and CSGT in PY 2024 will be calculated by comparing the generation cost for DAC-GT and CSGT resources to the generation cost for the base product – CPA’s “Clean Power” product – that customers would otherwise receive if they were not participating in the programs. The generation cost for the base product is a weighted average of the generation costs of the product’s renewable and non-renewable content, including Resource Adequacy. The delta between this weighted average cost and the generation cost of the DAC-GT resource was then multiplied by the forecasted volume to be served each month to arrive at the total Above Market Generation Costs from the program. The budget estimates for the Above Market Generation Costs in PY 2024 are summarized in Table 6.

Table 6: CPA’s Estimated Above Market Generation Costs for DAC-GT and CSGT for PY 2024

	DAC-GT	CSGT	TOTAL
Total customer load (kWh)	32,035,320	1,760,760	33,796,080
Total unsubscribed output (kWh)	0	0	0
Total volume (kWh)	32,035,320	1,760,760	33,796,080
Above Market Generation Costs	\$930,317	\$69,377	\$999,694

¹² See CPA Advice Letter 0010-E, dated as of October 29, 2021 and CPA Advice Letter 0020-E, dated as of December 15, 2022.

¹³ See CPA Advice Letter 0019-E, dated as of December 14, 2022.

¹⁴ *Id.*

ii. 20 Percent Bill Discount

As described in this AL, program participants will receive a 20 percent discount on the otherwise applicable rate, to be applied as a bill credit to their CPA utility charges. CPA's PY 2024 budget includes the estimated total amount of the customer bill discount to be recovered, as summarized in Table 7. The budget estimates are based on forecasted monthly enrollment in the DAC-GT program and average monthly CARE customer bills in CPA's service territory.

Table 7: CPA's Estimated 20 Percent Bill Discount Costs for DAC-GT and CSGT for PY 2024

Category	DAC-GT	CSGT	Total
Total New Customer Enrollment PY 2024	0	330	330
Cumulative Customers Enrolled ¹⁵	6,060	330	6,390
20 Percent Bill Discount	\$1,924,346	\$113,288	\$2,037,633

iii. Program Administration Costs

Administration costs are broken into Program Management, Information Technology ("IT"), Billing Operations, Regulatory Compliance, and Procurement. These cost categories are discussed further in the following subsections. Resolution E-4999 adopts a cap of 10 percent of each program's total annual budget to be allocated to Program Administration Costs.¹⁶ However, Resolution E-5125 acknowledges that delayed implementation of DAC-GT and CSGT programs may lead to no or low implementation costs, resulting in a high percentage of Program Administration Costs relative to the overall program budget.¹⁷

For PY 2024, CPA estimates total Program Administration Costs of \$255,208 for DAC-GT, which is 8% of the total DAC-GT budget of \$3,135,371. For CSGT in PY 2024, CPA estimates total Program Administration Costs of \$255,208, which is 54% of the total CSGT budget of \$469,872.

The percentage of the CSGT Program Administration budget compared to the overall program budget is currently higher than the 10 percent cap because we anticipate an enrollment of 330 customers for the CSGT program in PY 2024, and therefore the total program budget for PY 2023 does not include fully enrolled costs for the 20 Percent Bill Discount or Above Market Generation Costs. The CPUC recognized in Resolution E-5125 that "[u]ntil a program begins delivering customer benefits and accruing implementation costs, the program administration and ME&O costs will automatically exceed the 10 and 4 percent thresholds."¹⁸ Resolution E-5125 further recognized that full enrollment into the DAC-GT and CSGT programs may take longer than two start-up years.¹⁹ CPA requests that the Commission applies the same logic in consideration of

¹⁵ Program enrollment cap changes quarterly based on the ongoing average monthly kWh consumption. Enrollment cap for DAC-GT is 6,060 for Q1 of 2023.

¹⁶ Resolution E-4999 at 57 (Findings and Conclusions ¶ 41).

¹⁷ Resolution E-5125 at 6-7.

¹⁸ *Id.* at 10 (Findings and Conclusions ¶ 12).

¹⁹ *Id.* at 7

CPA's request to exceed the 10 percent cap on Program Administration Costs for its CSGT program.

Table 8 shows the total proposed Program Administration Costs for the two programs for PY 2024 and the estimates are discussed in further detail as follows.

Table 8: CPA's Proposed Program Administration Budgets for DAC-GT and CSGT for PY 2024

Category	DAC-GT	CSGT	Total
Program Management	\$215,808	\$215,808	\$431,616
Information Technology	\$14,400	\$14,400	\$28,800
Billing Operations	\$0	\$0	\$0
Regulatory Compliance	\$0	\$0	\$0
Procurement	\$25,000	\$25,000	\$50,000
Total	\$255,208	\$255,208	\$510,416

1. Program Management

CPA estimates program management costs of \$431,616 in PY 2024 for staff time to design and initiate program implementation, marketing, procurement, and ensure coordination with SCE and the Commission for budgetary and regulatory compliance. Program management costs are shared across the two programs and split evenly between the two program budgets. Table 9 shows the details of the program management budget proposed for PY 2024.

Table 9: Program Management Budget Details

Position	2024 Fully Loaded Hourly Rate	2024 % Yr	2024 Hours	2024 Total Labor Spend
Program Manager	\$156.74	80%	1,664	\$260,813
Program Associate	\$88.30	25%	520	\$45,914
Financial Manager	\$169.40	10%	208	\$35,234
Procurement & Contracts Manager	\$148.12	10%	208	\$30,808
Procurement/Contracts Associate	\$101.54	10%	208	\$21,119
Marketing Manager	\$120.92	15%	312	\$37,727
Total			3,120	\$431,616

2. Information Technology (IT)

CPA estimates costs of \$14,400 for the DAC-GT program and \$14,400 for the CSGT program in PY 2024 for vendor services related to information technology. For the DAC-GT and CSGT programs, these costs will cover improvements to Customer Relationship Management system reporting and procedures for messaging customers.

3. Billing Operations

CPA does not expect to incur any incremental billing operations costs for the DAC-GT or CSGT program during PY 2024 beyond the website enhancements that are included in the ME&O budget.

4. Regulatory Compliance

CPA does not estimate any specific regulatory compliance costs associated with the DAC-GT and CSGT programs. CPA assumes the regulatory support for these two programs will be absorbed in its general Regulatory Affairs budget.

5. Procurement

CPA estimates total procurement costs of \$50,000 for the DAC-GT and CSGT programs in PY 2024, as set forth in Table 10. Procurement cost estimates were determined by taking actual costs from prior CPA distributed resource solicitations and adjusting them based on the size, scope, and complexity of the solicitations for these programs. These costs are shared among the two programs and are spread evenly across the two programs for purposes of setting program-specific budgets.

Table 10: Procurement Budget Details for PY 2024

Category	DAC-GT	CSGT	Total
RFO Administration	\$0	\$0	\$0
RFO Valuation	\$0	\$0	\$0
Community Solar Consulting	\$0	\$0	\$0
Legal	\$25,000	\$25,000	\$50,000
Total	\$25,000	\$25,000	\$50,000

RFO Administration represents costs for a third party to conduct RFO administration services, including a web-based platform to take in bids, manage communications from and with bidders, and ensure the RFO is conducted in conformance with the RFO Protocol. RFO Valuation represents costs for a third party to conduct RFO valuation services, including ensuring that bid submissions are in conformance with the RFO project eligibility requirements and performing analysis to determine quantitative and qualitative assessment of bids.

There are no current costs reflected in RFO Administration and RFO Valuation because CPA anticipates conducting these activities using in-house resources, rather than using a third party,

which is reflected in this budget. In-house resource costs are detailed in the Program Management Budget. In addition, CPA will partner with its member jurisdictions to take an active role in identifying community solar sites within its service territory. However, this will be performed by CPA staff and not a third party consultant. Legal includes costs for external legal counsel to support PPA negotiations, assuming use of the standard pro forma contract with minimal edits.

iv. ME&O Costs

For PY 2024, CPA estimates total ME&O Costs of \$25,500 for DAC-GT, which is 1% percent of its total budget of \$3,135,371. For CSGT for PY 2024, CPA estimates total ME&O Costs of \$32,000, which is 7% percent of its total budget of \$469,872. Resolution E-4999 adopts a cap of 4 percent of each program's total annual budget to be allocated to ME&O.²⁰ Resolution E-5125 requires Program Administrators to include a rationale for why an exceedance of the 4% ME&O budget cap is warranted, which is provided below for both programs.²¹

The percentage of the CSGT ME&O Costs is higher than 4% of the overall CSGT budget because CPA anticipates partial enrollment for the CSGT program in PY 2024, and therefore the total program budget for PY 2024 does not include fully enrolled costs for the 20 Percent Bill Discount or Above Market Generation Costs. Resolution E-5125 acknowledges that delayed implementation of DAC-GT and CSGT programs may lead to no or low implementation costs, resulting in a high percentage of ME&O Costs relative to the overall program budget.²² As mentioned in discussion of CSGT Program Administration Costs above, Resolution E-5125 recognizes that budget caps may be unnecessary in such scenarios and CPA requests that the Commission applies the same logic in consideration of CPA's request to exceed the 4 percent cap on ME&O Costs for its CSGT program.

CPA plans to implement the proposed ME&O efforts with a combination of third party creative and digital agencies and other print and media vendors. These vendors will be awarded contracts in accordance with all CPA procurement policies and procedures. To determine the budget estimates for ME&O Costs for DAC-GT and CSGT, CPA worked with its current third party vendors to develop proxy estimates based on detailed estimated and/or actual spend for similar ME&O activities for similar programs. These estimates include costs for graphic design and production, translation, printing and mailing, website design, and social media and paid media buys. Further details are included in CPA's annual ME&O plan, which is attached hereto as Appendix A.

The ME&O Costs also include a line item for outreach grants to community-based organizations ("CBOs") (including eligible Community Sponsors) with whom CPA will collaborate to support customer outreach, education, and enrollment in DACs and California Indian Country (as defined in Resolution E-5212).²³ A detailed account of the PY 2024 ME&O Costs is available in Table 11 below.

²⁰ Resolution E-4999 at 57 (Findings and Conclusions ¶ 41).

²¹ Resolution E-5125 at 11 (OP 2).

²² *Id.* at 6-7.

²³ Resolution E-5212, at 11 and 14 (OP 3).

Table 11: CPA's Proposed ME&O Budget for DAC-GT and CSGT for PY 2024

Category	DAC-GT	CSGT	Total
Grassroots Marketing			
CBO grants	\$0	\$0	\$0
Event display materials/ handouts/supplies	\$2,000	\$0	\$2,000
<i>Subtotal</i>	<i>\$2,000</i>	<i>\$0</i>	<i>\$2,000</i>
Targeted Marketing			
Direct mail postage/printing	\$3,500	\$3,500	\$7,000
Ethnic media radio ads	\$0	\$0	\$0
Ethnic media print ads	\$0	\$0	\$0
Graphic design	\$6,000	\$8,000	\$14,000
Translation services	\$2,000	\$2,500	\$4,500
<i>Subtotal</i>	<i>\$11,500</i>	<i>\$14,000</i>	<i>\$25,500</i>
Broad-based Marketing			
Social media ads	\$8,000	\$12,000	\$20,000
Digital ads	\$0	\$0	\$0
Graphic design	\$0	\$0	\$0
Flyers/fact sheets printing	\$0	\$0	\$0
Translation services	\$0	\$0	\$0
Website graphic design	\$3,000	\$5,000	\$8,000
Web page translations	\$1,000	\$1,000	\$2,000
<i>Subtotal</i>	<i>\$12,000</i>	<i>\$18,000</i>	<i>\$30,000</i>
Research			
Customer focus groups (participant incentives)	\$0	\$0	\$0
Translation services	\$0	\$0	\$0
Focus group meeting expenses (childcare)	\$0	\$0	\$0
<i>Subtotal</i>	<i>\$0</i>	<i>\$0</i>	<i>\$0</i>
TOTAL	\$25,500	\$32,000	\$57,500

v. Independent Evaluator Funding

Resolution E-4999 requires IOUs to include a budget for a proportional share of funding for an independent evaluator to review the DAC-GT and CSGT programs every three years beginning in PY 2021²⁴ and to review the CSGT program after the first year that customers are able to subscribe

²⁴ Resolution E-4999 at 68, OP 5.

to the program.²⁵

Resolution E-5102 states that “responsibilities for funding the independent evaluator review remain with the IOUs for each service territory in which a CCA resides.”²⁶ Pursuant to Resolution E-5102, CPA will not budget any funds for the statewide independent evaluator.

b. Program Capacity and Customer Details

Resolution E-4999 states, “for each program, the budget submission must include details on the program’s existing capacity, the capacity targeted for procurement in that program year, the number of customers currently served, and the number of additional customers estimated to be served.”²⁷ Table 12 provides this information for the PY 2024 budget.

Table 12. CPA Targeted DAC-GT and CSGT Program Capacity and Enrollment

Program Detail	DAC-GT		CSGT	
	PY 2023	PY 2024	PY 2023	PY 2024
Existing Capacity at beginning of period	0 MW ²⁸	8.92 MW	0 MW	0.67 MW
Incremental Capacity targeted for procurement	8.92 MW	3.27 MW	0.67 MW	2.7 MW
Number of customers served at beginning of PY	6,060	6,060	0	330
Number of additional customer enrollments estimated	0	0	330	0
Total customer load	32,035 MWh	32,035 MWh	0 MWh	1,760 MWh

c. GHG Revenue and Public Purpose Program Fund Set Asides

Upon approval of this AL, SCE will include CPA’s PY 2024 program budget in its 2024 ERRRA Forecast in May 2023. Going forward, SCE will remit program funds to CPA in quarterly installments (by January 1, April 1, July 1 and October 1 of each year).

In accordance with Resolution E-4999, once received, CPA will track the program funds in separate accounts for CSGT and DAC-GT programs and will record all generation cost deltas, customer bill discounts, and program expenses for each program.²⁹ CPA’s 2024 Annual Budget Advice Letter will include a reconciliation of the PY 2023 budget estimate with actual expenditures, along with its PY 2025 budget forecast.

²⁵ *Id.* at 31.

²⁶ Resolution E-5102 at 8.

²⁷ Resolution E-4999 at 27.

²⁸ DAC-GT program participants will be serviced using interim resources.

²⁹ Resolution E-4999 at 26-27.

CONCLUSION

For the reasons stated in this AL, CPA requests approval of its PY 2024 budgets for its DAC-GT and CSGT programs. In accordance with Resolution E-5125, CPA further requests that its PY 2024 budget to be exempt from the 4% budget cap for ME&O Costs for the CSGT program and the 10% budget cap for Program Administration Costs for the CSGT program.

APPENDICES

Appendix A: Annual Marketing, Education, and Outreach Plan

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.2, Resolution E-4999, Resolution E-5102, Resolution E-5125, and Resolution E-5212, this AL is submitted with a Tier 2 designation.

EFFECTIVE DATE

This AL will become effective on March 3, 2023, which is the 30th calendar day after the date of its submission.

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

Francis Choi
Senior Advisor, Regulatory Affairs
Clean Power Alliance of Southern California

801 S. Grand Ave., Suite 400
Los Angeles, CA 90017
Email: fchoi@cleanpoweralliance.org

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.

Pursuant to Resolution E-5174, this document will be submitted in electronic form only to EDTariffUnit@cpuc.ca.gov. 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. 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.

Appendix A: Power Share Program Marketing, Education and Outreach Plan

Power Share Program Marketing, Education and Outreach Plan (ME&O Plan)

Overview

In January 2021, Clean Power Alliance (CPA) launched its Disadvantaged Communities – Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT) programs, which provide 20 percent bill discounts and renewable energy to eligible Disadvantaged Community (DAC) and California Indian Country (as defined in Resolution E-5212) customers. These programs are meant to advance energy equity by providing affordable access to clean energy in underserved communities. Prior to launching the program, CPA branded the programs as “Power Share” (for DAC-GT) and “Community Solar” (for CSGT) to be better understood by the public.

CPA fully enrolled the Power Share program in September of 2022. The program utilizes a waitlist to fill in for customers who unenroll or lose eligibility due to their CARE or FERA status. CPA has seen unenrollment vary between 50-175 customers per month. Marketing, education and outreach efforts will be used to maintain a program waitlist and ensure that the program does not drop below full enrollment. CPA plans to use similar ME&O strategies, but at a smaller scale. Additionally, a small portion of ME&O funds will be used to promote the 2024 CSGT RFO and encourage participation amongst solar developers, site hosts, and community sponsors.

This ME&O plan includes an outline of objectives, strategies, and tactics as well as associated budgets for 2024.

Program Objectives

The Power Share program will provide eligible low-income customers living in disadvantaged communities with access to 100% renewable energy as well as a 20 percent discount on their electricity bills. CPA will achieve the following program objectives:

- Support energy equity and help to build sustainable communities by allowing eligible residents in disadvantaged communities and California Indian Country to receive renewable energy and a 20% discount on their electricity bills.
- CPA will maintain full enrollment of the program at approximately 6,200 eligible customers as part of the DAC-GT component of the program accounting for the 12.19 megawatts allocated by the CPUC. These customers will receive 100% renewable energy at a 20% bill discount.
- Increase awareness about how DAC-GT benefits the community.

The Community Solar program will provide low-income customers living in disadvantaged communities with access to locally generated, 100% renewable energy as well as a 20 percent discount on their electricity bills. CPA will achieve the following program objectives:

- Increase awareness about how the CSGT program benefits the community
- CPA will work with communities and energy developers to support the development of small-scale solar projects in eligible DACs and California Indian Country as part of CPA's capacity allocation of 3.37 megawatts of solar for the CSGT program.
- CPA will sign up approximately 340 eligible customers located anywhere in the census tracts within five miles of project sites accounting for the 0.67 megawatts of procured power. These customers will receive 100% renewable energy at a 20% discount.

Target Audiences

<p>DAC-GT</p> <p>An estimated 95,000 CPA-eligible customer accounts in DACs and California Indian Country Customers include:</p> <ul style="list-style-type: none"> • Renters • CARE and FERA recipients • Individually metered residents of affordable housing complexes • Monolingual speakers (including Spanish, Chinese, and/or Tagalog) 	<p>CSGT</p> <ul style="list-style-type: none"> • Energy developers • DAC communities within five miles of CPA service area • Board Members • Member Agencies • Community Advisory Committee Members • Elected Officials and Community Leaders • Eligible residential customers who reside within five miles from a Community Solar site • Non-profit sponsors and site host • For profit buildings who can participate as site host • Media <p>Customers include:</p> <ul style="list-style-type: none"> • Renters • CARE and FERA recipients • Individually metered residents of affordable housing complexes • Monolingual speakers (including Spanish, Chinese, and/or Tagalog)
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Key Messages

DAC-GT	CSGT
<ul style="list-style-type: none">• OVERARCHING MESSAGE – Qualifying customers save 20% off their monthly electric bill and receive 100% renewable power.• CARE and FERA customers, you qualify for an additional 20% discount off your monthly bill.• The CPA program makes clean energy more affordable to low-income communities which otherwise may not have access to solar, wind, or other clean energy sources.• CALL TO ACTION – Find out if you qualify today, learn more at SaveWithCPA.org or call 1-888-585-3788.• Maintain enrollment waitlist and move customers into program monthly.• Economic benefits: Meaningful monthly electric bill savings for eligible customers; No need to purchase or install any equipment.• Equity: Access to clean power in underserved communities.• Environmental: Customers will benefit from local renewable energy, while helping lead the way to a greener future for all.	<ul style="list-style-type: none">• Economic: Non-profit site sponsors as well as eligible customers receive 20% discounts.• Local pride: Clean energy projects located in customers’ neighborhoods and supported by community stakeholders.• Equity: Access to clean power in underserved communities.• Environmental: Customers will benefit from local renewable energy while helping lead the way to a greener future for all.

Strategies

Overarching	
<ul style="list-style-type: none">• Emphasize 20% discounts for customers, as well as site sponsors.• Communicate the impact of both programs to each qualifying community.	
DAC-GT <ul style="list-style-type: none">• Use broad-reach media to build program awareness and impact.• Leverage CPA customer database to specifically target our CARE and FERA customers via email and direct mail.	CSGT <ul style="list-style-type: none">• ME&O efforts will initially support recruiting efforts for developers, community sponsors, site hosts and, then shift to end-user marketing and community outreach where projects are being placed.• CPA Team Members and Member Agencies will assist with reaching out to, building relationships with and working towards identifying sponsors, site locations, and developers.• Since program beneficiaries will be local, there is an opportunity to engage local elected officials and advocacy group leaders to promote this program to their communities.

Tactics

Overarching	
<ul style="list-style-type: none">• Press Releases for milestones such as new projects or reaching enrollment goals.• CPA staff will continue to work with its board members and member agencies to achieve support and endorsement of the Power Share and Community Solar programs.• CPA will continue to target CARE and FERA customers via targeted marketing tactics.• CPA's Community Advisory Committee will be given additional materials on how to do outreach and enrollment within their community networks.• CPA will continue to monitor and refresh outreach materials, messaging, social media, and website content and create communication kits for the member agencies and coordinate with their Public Information Officers to disseminate. The content will be available to be placed on city and board members' websites, newsletters, social media channels, public television channels, and bulletin boards and accessible to use in co-branded mail and email to their contact lists and networks in DACs and California Indian Country (e.g., via neighborhood councils).	
DAC-GT <ul style="list-style-type: none">• Paid Media:<ul style="list-style-type: none">○ Direct mail○ Targeted emails○ Social media○ Digital○ Interviews/Endorsements• Partners<ul style="list-style-type: none">○ Member Agencies• Landing page updates• Owned media including social media, website updates, monthly emails to CPA list• Community event tabling with in-language collateral.	CSGT <ul style="list-style-type: none">• Paid Media:<ul style="list-style-type: none">○ Direct mail○ Targeted emails○ Social media○ Trade publication• Owned media including social media, website updates, emails, webinars• Pairing Tool to help developers, hosts, and sponsors to find each other.• Partners<ul style="list-style-type: none">○ CBOs○ Member Agencies• Presentations at Chambers or other groups to identify sponsors and developers

Campaign Metrics

CPA will collect the following metrics for each applicable ME&O channel for 2023 and 2024. We will evaluate the projections below and optimize them accordingly.

DAC-GT Overall Media Impressions: 225,000 Website pageviews: 151,000 Program enrollment email open rate: 35.5% Social Media Engagement Rate: 15% Call center calls (by language about Power Share): 45-50 English language, 5-15 Spanish language, and 2-5 Mandarin or Cantonese language calls/month	CSGT Overall Media Impressions: 720,000 Solar developer email open rates: 40% Number of targeted community meetings conducted: 2-5 per year Sponsors that sign up for the partnering resource: Help identify and match at least 7 partnerships through pairing resource Community outreach: 2-5 presentations or webinars in 2024
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