



March 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-A

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

PURPOSE

Clean Power Alliance of Southern California ("CPA") respectfully submits this supplemental Advice Letter ("Supplemental Advice Letter") amending Advice Letter CPA 0021-E ("2024 Budget Advice Letter") to reflect updates to its proposed program year ("PY") 2024 Above Market Generation Cost estimates for CPA's Disadvantaged Communities Green Tariff ("DAC-GT") and Community Solar Green Tariff ("CSGT") programs.

EXECUTIVE SUMMARY OF UPDATES

CPA filed its 2024 Budget Advice Letter on February 1, 2023 in compliance with Resolution E-4999,¹ Resolution E-5102,² Resolution E-5125,³ and Resolution E-5212,⁴ and submitted annual budget estimates for approval from the California Public Utilities Commission ("Commission"). This Supplemental Advice Letter provides updates to the DAC-GT and CSGT Above Market Generation Cost figures that were provided in the 2024 Budget Advice Letter. By updating an energy procurement cost input, CPA forecasts a lower budget than requested in the 2024 Budget Advice Letter and herein requests the following modifications:

1. The PY 2024 DAC-GT Above Market Generation Cost budget is reduced from \$930,317 to \$901,672.
2. The PY 2024 CSGT Above Market Generation Cost budget is reduced from \$69,377 to \$62,326.

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).

Correspondingly, CPA's total PY 2024 DAC-GT and CSGT budget request is reduced from \$3,605,243 to \$3,569,548 and CPA's total PY 2024 DAC-GT and CSGT remittance request is reduced from \$1,656,292 to \$1,649,242.

Additionally, CPA updated DAC-GT Above Market Generation Costs for PY 2022 with updated realized expenses, resulting in an increase from \$280,967 to \$336,138. The sections below reflect the detailed updates to the 2024 Budget Advice Letter.

UPDATES TO ORIGINAL ADVICE LETTER

1. Replacement of Table 2

Table 2 in the 2024 Budget Advice Letter is hereby deleted and replaced with the following replacement Table 2 to reflect updated DAC-GT Above Market Generation Costs for PY 2022.

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

	DAC-GT	CSGT	Total
Above Market Generation Costs	\$336,138	\$0	\$336,138
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	\$1,488,555	\$238,952	\$1,727,507
PY 2022 Approved Program Budget	\$3,408,073	\$565,429	\$3,973,502
PY 2022 Unspent Balance	\$1,919,519	\$326,477	\$2,245,996

The redlined language for Footnote 7, which is referenced in Table 2, is reflected below:

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

2. Updates to Discussion Section 2

CPA has adjusted the DAC-GT, CSGT, and overall budget estimates in Discussion Section 2 relating to Program Budget Estimates for PY 2024.

The redlined language for paragraph 1 in Section 2 of the Discussion is reflected below:

For PY 2024, CPA is proposing a total budget of ~~\$\$3,605,243~~ **\$3,569,548** for the DAC-GT and CSGT programs. This includes ~~\$3,135,371~~ **\$3,106,726** for DAC-GT and ~~\$469,872~~ **\$462,822** 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.

The redlined language for paragraph 2 in Section 2 of the Discussion is reflected below:

For PY 2024, CPA requests ~~\$1,656,292~~ ~~\$1,649,242~~ 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~~ ~~\$26,769~~ 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~~ ~~\$333,714~~. CPA will use ~~\$930,317~~ ~~\$901,672~~ 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~~ ~~\$333,714~~ (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.

The redlined language for paragraph 2 in Section 2(a)(iii) of the Discussion is reflected below:

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~~ ~~\$3,106,726~~. For CSGT in PY 2024, CPA estimates total Program Administration Costs of \$255,208, which is ~~54%~~ ~~55%~~ of the total CSGT budget of ~~\$469,872~~ ~~\$462,822~~.

The redlined language for paragraph 1 in Section 2(a)(iv) of the Discussion is reflected below:

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~~ ~~\$3,106,726~~. 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~~ ~~\$462,822~~. 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

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3. Replacement of Table 4

Consistent with updates to Discussion Section 2, Table 4 in the 2024 Budget Advice Letter is hereby deleted and replaced with the following replacement Table 4:

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

Category	DAC-GT	CSGT	Total
Above Market Generation Costs	\$901,672	\$62,326	\$963,998
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	\$3,106,726	\$462,822	\$3,569,548

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4. Replacement of Table 5

Consistent with updates to Discussion Section 2, Table 5 in the 2024 Budget Advice Letter is hereby deleted and replaced with the following replacement Table 5:

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	\$901,672	\$62,326	\$963,998
Subtract PY 2022 Unspent Funds	\$1,235,386	\$35,557	\$1,270,943
Net Difference of PY 2024 Request and PY 2022 Unspent Funds	(\$333,714)	\$26,769	(\$306,945)
Remittance Request for Above Market Generation Costs	\$0	\$26,769	\$26,769
<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	\$3,106,726	\$462,822	\$3,569,548
Subtract PY 2021 Budget Corrections	\$17,305	(\$9,281)	\$8,024
Subtract PY 2022 Unspent Funds	\$1,585,805 ¹⁰	\$326,477	\$1,940,927
PY 2024 Remittance Request	\$1,503,616	\$145,626	\$1,649,242

The redlined language for Footnote 10, which is referenced in Table 5, is reflected below:

This amount is the sum of ~~\$930,317~~ \$901,672 to be applied from unspent funds that were previously allocated for PY 2022 DAC-GT Above Market Generation Costs (the remaining ~~\$360,240~~ \$333,714 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.

5. Replacement of Table 6

Consistent with updates to Discussion Section 2, Table 6 in the 2024 Budget Advice Letter is hereby deleted and replaced with the following replacement 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	\$901,672	\$62,326	\$963,998

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 Supplemental Advice Letter is submitted with a Tier 2 designation, which is the same tier designation as the 2024 Budget Advice Letter.

EFFECTIVE DATE

CPA requests that this Supplemental Advice Letter become effective concurrent with the 2024 Budget Advice Letter.

NOTICE

Anyone wishing to protest this Supplemental Advice Letter 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 Supplemental Advice Letter. 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 Supplemental Advice Letter 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
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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.

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 Supplemental Advice Letter 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.