



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Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: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:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

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
Curtable 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 8, 2024

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

Advice Letter CPA 0029-E

SUBJECT: Clean Power Alliance of Southern California’s Disadvantaged Communities Green Tariff Program and Community Solar Green Tariff Program Budget Estimates for 2025

PURPOSE

Pursuant to California Public Utilities Commission’s (“Commission”) Resolution E-4999,¹ Resolution E-5102,² Resolution E-5125,³ and Decision (“D.”) 24-05-065⁴ 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.⁵ 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

¹ Commission Resolution E-4999, Pursuant to Decision 18-06-027, Approving with Modification, Tariffs to Implement the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs, at pp. 67 (Ordering Paragraph (“OP”) 2) and 68 (OP 4).

² Commission Resolution E-5102, Approving with Modification, Clean Power Alliance’s Tariffs to Implement the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs, at pp. 7-8.

³ Commission Resolution E-5125, Approves with Modification Pacific Gas and Electric Company’s and Southern California Edison Company’s Requests to Adjust Administrative & Marketing Budget Caps for the Disadvantaged Communities Green Tariff and/or Community Solar Green Tariff programs, at p. 11 (OPs 2 and 3).

⁴ D.24-05-065, Decision Modifying Green Access Program Tariffs and Adopting a Community Renewable Energy Program, at pp. 169-170 (OPs 2, 3(b), and 3(e)).

⁵ D.18-06-027, Alternate Decision Adopting Alternatives to Promote Solar Distributed Generation in Disadvantaged Communities, issued June 22, 2018, at p.104 (OP 17).



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.⁶ 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 investor-owned utility (“IOU”) or another CCA.⁷ 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.18-10-007,⁸ Resolution E-4999, and guidance received from the Commission’s Energy Division.

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.”⁹ Resolution E-4999 provides similar reporting and budgeting requirements and outlines the descriptions to be provided for each budget line item.¹⁰ 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.¹¹

On January 24, 2024, the Commission Executive Director granted, via letter, an extension of time for Community Choice Aggregators (“CCAs”) to submit their Tier 2 2025 DAC-GT and CSGT Program Budget Advice Letters from February 1, 2024 to the later of either May 1, 2024 or 30 days after the issuance of a Final Decision in proceeding A.22-05-022.¹² On June 6, 2024, the Commission issued D.24-05-065 which increases DAC-GT program capacity cap for some program administrators, requires automatic enrollment for DAC-GT, and makes revisions to the CSGT program. Accordingly, CPA files this tier 2 AL in compliance with Resolution E-4999, Resolution E-5102, Resolution E-5125, and D.24-05-065 and submits the annual budget estimate detailed herein for Commission approval.

DISCUSSION

1. Previous Program Year Balances

On February 1, 2022, CPA submitted Advice Letter 0014-E (the “2022 Budget AL”), which included budget projections for CPA’s DAC-GT and CSGT programs for Program Year (“PY”) 2023. The proposed budgets set forth in the 2022 Budget AL were subsequently approved by the Commission. A summary of CPA’s approved PY 2023 budget is presented below in Table 1.

⁶ Ibid, at p. 56 (Footnote (“FN”) 36).

⁷ Resolution E-4999 at p. 54 (OP 19).

⁸ D.18-10-007, Decision Correcting and Clarifying Decision 18-06-017, issued October 11, 2018.

⁹ Resolution E-5102 at p. 8.

¹⁰ Resolution E-4999 at pp. 67-68 (OPs 2-4).

¹¹ Resolution E-5125, at p.11 (OP 2).

¹² January 24, 2024, Executive Director Peterson Letter Re: Joint Community Choice Aggregators’ Request for Extension of Time to Submit Tier 2 2025 Disadvantaged Communities Green Tariff and Community Solar Green Tariff Program Budget Advice Letters, at p. 2.

Table 1. CPA’s Approved PY 2023 Budget

Category	DAC-GT	CSGT	Overall Total
Above Market Generation Costs	\$365,361	\$0	\$365,361
20% Bill Discount	\$2,051,413	\$0	\$2,051,413
Program Administration	\$255,219	\$484,819	\$740,038
Marketing, Education & Outreach	\$147,000	\$76,000	\$223,000
Independent Evaluator	\$0	\$0	\$0
Total	\$2,818,993	\$560,819	\$3,379,812

CPA’s PY 2023 approved budget, actual expenses, and unspent balance are indicated in Table 2 below.

Table 2. CPA’s PY 2023 Expenses and Unspent Balance¹³

	DAC-GT	CSGT	Total
Above Market Generation Costs	\$239,406	\$0	\$239,406
20% Bill Discount	\$1,149,862	\$0	\$1,149,862
Program Administration	\$107,970	\$107,970	\$215,940
Marketing, Education & Outreach	\$17,811	\$31,583	\$49,394
Independent Evaluator	\$0	\$0	\$0
PY 2023 Actual Expenses Total	\$1,515,049	\$139,553	\$1,654,602
PY 2023 Approved Program Budget	\$2,818,993	\$560,819	\$3,379,812
PY 2023 Unspent Balance	\$1,303,944	\$421,266	\$1,725,210

CPA’s figures include all realized and accrued expenses for 2023 as of the date of this AL.¹⁴

2. Program Budget Estimates for Program Year 2025

D.24-05-065 discontinued future solicitations for the CSGT program and provides that “[procured] CSGT capacity and procurement in existing active solicitations *may* [emphasis added] be

¹³ Reflects realized and accrued expenses for PY 2023 as of July 8, 2024.

¹⁴ “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 p. 27, FN 61).

transferred to DAC-GT.”¹⁵ CPA has fully procured capacity for the CSGT program in an amount equal to its capacity allocation for CSGT. In accordance with Program Administrator discretion provided under D.24-05-065 and consultation with Energy Division staff, CPA elects to maintain its existing CSGT program instead of transferring projects to DAC-GT and proposes a PY 2025 budget for procured CSGT capacity.

For PY 2025, CPA is proposing a total budget of \$6,454,150 for the DAC-GT and CSGT programs. This includes \$5,646,663 for DAC-GT and \$807,487 for CSGT. Table 3 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 3. CPA’s Proposed Budgets for DAC-GT and CSGT for PY 2025

Category	DAC-GT	CSGT	Total
Above Market Generation Costs	\$1,605,769	\$302,542	\$1,908,311
20% Bill Discount	\$3,626,763	\$398,980	\$4,025,743
Program Administration	\$386,131	\$74,965	\$461,096
ME&O	\$28,000	\$31,000	\$59,000
Independent Evaluator	\$0	\$0	\$0
PY 2024 Budget Total	\$5,646,663	\$807,487	\$6,454,150

For PY 2025, CPA requests \$4,073,500 in total remittances, which shall be the total amount of CPA’s requested PY 2025 budget less (1) CPA’s PY 2023 unspent funds, (2) CPA’s PY 2022 unspent funds, and (3) termination payments made to CPA in connection with terminated DAC-GT power purchase agreements (“PPAs”), which amounts have been credited to the DAC-GT program. Of this amount, CPA requests \$1,126,916 to be applied toward Above Market Generations Costs and \$2,946,584 to be applied to the remaining budget items, as detailed in Table 4 below.

Table 4. CPA’s Remittance Request for DAC-GT and CSGT for PY 2025

Category	DAC-GT	CSGT	Total
<i>Above Market Generation Costs</i>			
Generation Cost Delta	\$1,605,769	\$302,542	\$1,908,311
Subtract PY 2023 Unspent Funds	\$125,955	\$0	\$125,955
Subtract PY 2022 Unspent Funds	\$360,240	\$0	\$360,240
Subtract Termination Payments	\$295,200	\$0	\$295,200
Remittance Request for Above Market Generation Costs	\$824,374	\$302,542	\$1,126,916

¹⁵ D.24-05-065, at p. 169 (OP 2).

<i>Other Budget Items</i>			
20% Bill Discount	\$3,626,763	\$398,980	\$4,025,743
Program Administration	\$386,131	\$74,965	\$461,096
Marketing, Education & Outreach	\$28,000	\$31,000	\$59,000
Independent Evaluator	\$0	\$0	\$0
Other Budget Items Subtotal	\$4,040,894	\$504,945	\$4,545,839
Subtract PY 2023 Unspent Funds	\$1,177,989	\$421,266	\$1,599,255
Remittance Request for Other Budget Items	\$2,862,905	\$83,679	\$2,946,584
<i>Total Remittance Request</i>			
PY 2025 Remittance Request	\$3,687,279	\$386,221	\$4,073,500

a. Budget Details

Resolution E-4999 requires that annual budget submissions include the following:¹⁶

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

The Above Market Generation Costs for DAC-GT and CSGT in PY 2025 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.

D.24-05-065 increased the capacity cap of each DAC-GT Program Administrator “who is close to being fully procured... to allow the enrollment of an additional 50 percent of eligible customers.”¹⁷

¹⁶ Resolution E-4999 at p. 67 (OP 2).

¹⁷ D. 24-05-065, at p. 170 (OP 3(e)).

The additional capacity allocated to CPA’s DAC-GT program under D.24-05-065 is 6.095 MW.¹⁸ As of the date of this AL, two contracts for CPA DAC-GT projects have been terminated in 2024, returning 4.92 MW of DAC-GT capacity to be procured. This AL, including the Above Market Generation Costs summarized below, reflects CPA’s procurement of DAC-GT capacity in an amount equal to the total unprocured capacity allocation for the DAC-GT program. CPA will continue to serve its DAC-GT customers with interim DAC-GT resources in PY 2025 in addition to generation from operational projects.

CPA has contracted for the full capacity of CSGT.¹⁹ The budget estimates for the Above Market Generation Costs in PY 2025 are summarized in Table 5 below.

Table 5: CPA’s Estimated Above Market Generation Costs for DAC-GT and CSGT for PY 2025

	DAC-GT	CSGT	TOTAL
Total customer load (kWh)	48,038,490	5,877,473	53,915,963
Total unsubscribed output (kWh)	0	0	0
Total volume (kWh)	48,038,490	5,877,473	53,915,963
Above Market Generation Costs	\$1,605,769	\$302,542	\$1,908,311

ii. 20% Bill Discount

As described in this AL, program participants will receive a 20% discount on the otherwise applicable rate, to be applied as a bill credit to their CPA utility charges. CPA’s PY 2025 budget includes the estimated total amount of the customer bill discount to be recovered, as summarized in Table 6 below. The budget estimates are based on forecasted monthly enrollment in the DAC-GT program and average monthly California Alternate Rates for Energy (“CARE”) customer bills in CPA’s service territory.

Table 6: CPA’s Estimated 20% Bill Discount Costs for DAC-GT and CSGT for PY 2025

Category	DAC-GT	CSGT	Total
Total New Customer Enrollment PY 2025	3,580	1,860	5,440
Cumulative Customers Enrolled²⁰	10,090	1,860	11,950
20 Percent Bill Discount	\$3,626,763	\$398,980	\$4,025,743

¹⁸ Ibid., Table 6: DAC-GT Capacity Estimates by Program Administrator, at p. 137.

¹⁹ Quarterly Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs Report of Clean Power Alliance of Southern California for First Quarter 2024, as submitted on April 29, 2024, at pp. 1-2.

²⁰ Program enrollment cap changes quarterly based on the ongoing average monthly kWh consumption. Enrollment cap for DAC-GT is 10,090 as of Q2 of 2024.

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% of each program’s total annual budget to be allocated to Program Administration Costs.²¹

For PY 2025, CPA estimates total Program Administration Costs of \$386,131 for DAC-GT, which is 6.8% of the total DAC-GT budget of \$5,646,663. For CSGT in PY 2025, CPA estimates total Program Administration Costs of \$74,965, which is 9.3% of the total CSGT budget of \$807,487.

Table 7 shows the total proposed Program Administration Costs for the two programs for PY 2025 and the estimates are discussed in further detail as follows.

Table 7: CPA's Proposed Program Administration Budgets for DAC-GT and CSGT for PY 2025

Category	DAC-GT	CSGT	Total
Program Management	\$346,131	\$59,965	\$406,096
Information Technology	\$15,000	\$15,000	\$30,000
Billing Operations	\$0	\$0	\$0
Regulatory Compliance	\$0	\$0	\$0
Procurement	\$25,000	\$0	\$25,000
Total	\$386,131	\$74,965	\$461,096

1. Program Management

CPA estimates total program management costs of \$406,096 in PY 2025 for staff time to design and initiate program implementation, marketing, and procurement, and ensure coordination with SCE and the Commission for budgetary and regulatory compliance. Shared program management costs are divided between the two program budgets based on each program’s proportion of the combined capacity (measured in MW) of DAC-GT (84.44% of combined capacity) and CSGT (15.56% of combined capacity). CPA’s program management cost allocation differs from previous budget years where shared program management costs were equally shared by the DAC-GT and CSGT programs. The cost allocation approach has been revised to reflect (1) a proportional increase in contract and program management costs for DAC-GT, which are proportionally greater than costs for CSGT as the programs have transitioned from the initial implementation phase to the service phase, and (2) growth of management costs for the DAC-GT program due to the added capacity allocation of 6.095 MW pursuant to D. 24-05-065. All program-specific costs are allocated to their associated program. Table 8 shows the details of the program management budget proposed for PY 2025.

²¹ Resolution E-4999, at p. 57 (Findings and Conclusions ¶ 41).

Table 8: Program Management Budget Details

Position	2025 Fully Loaded Hourly Rate	2025 % Yr	2025 Hours	2025 DAC-GT Labor Spend	2025 CSGT Labor Spend	2025 Total Labor Spend
Program Manager	\$163.01	80%	1,664	\$229,033	\$42,212	\$271,245
Program Associate	\$91.83	20%	416	\$32,256	\$5,944	\$38,200
Financial Manager	\$176.17	10%	208	\$30,941	\$5,703	\$36,644
Procurement & Contracts Manager	\$154.04	3.8%	80	\$12,323	\$0	\$12,323
Procurement/Contracts Associate	\$105.60	3.8%	80	\$8,448	\$0	\$8,448
Marketing Manager	\$125.76	15%	312	\$33,130	\$6,106	\$39,236
Total			2,760	\$346,131	\$59,965	\$406,096

2. Information Technology (“IT”)

CPA estimates costs of \$15,000 for the DAC-GT program and \$15,000 for the CSGT program in PY 2025 for vendor services related to information technology. For the DAC-GT program, IT costs will cover updating enrollment processes in CPA’s Customer Relationship Management System due to automatic enrollment in accordance with D. 24-05-065.²² For the CSGT program, IT costs will cover improvements to the Customer Relationship Management System reporting and procedures for customer engagement.

3. Billing Operations

CPA does not expect to incur any incremental billing operations costs for the DAC-GT or CSGT programs during PY 2025 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 \$25,000 for the DAC-GT program in PY 2025, as set forth in Table 7. 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.

²² D. 24-05-065, at p. 170 (OP 3(b)).

CPA does not estimate any specific procurement costs associated with the CSGT program. CPA has procured capacity for CSGT programs in an amount equal to its capacity allocation for CSGT and has no need to hold future solicitations.

iv. ME&O Costs

For PY 2025, CPA estimates total ME&O Costs of \$28,000 for DAC-GT, which is 0.5% percent of its total budget of \$5,646,663. For PY 2025, CPA estimates total ME&O Costs of \$31,000 for CSGT, which is 3.8% percent of its total budget of \$807,487.

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. 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.

A detailed account of the PY 2025 ME&O Costs is available in Table 9 below.

Table 9: CPA’s Proposed ME&O Budget for DAC-GT and CSGT for PY 2025

Category	DAC-GT	CSGT	Total
Grassroots Marketing			
CBO grants	\$0	\$0	\$0
Event display materials/ handouts/supplies	\$2,000	\$2,000	\$4,000
<i>Subtotal</i>	<i>\$2,000</i>	<i>\$2,000</i>	<i>\$4,000</i>
Targeted Marketing			
Direct mail postage/printing	\$0	\$8,000	\$8,000
Ethnic media radio ads	\$0	\$0	\$0
Ethnic media print ads	\$0	\$0	\$0
Graphic design	\$0	\$8,000	\$8,000
Translation services	\$0	\$3,000	\$3,000
<i>Subtotal</i>	<i>\$0</i>	<i>\$19,000</i>	<i>\$19,000</i>

Broad-based Marketing			
Social media ads	\$8,000	\$0	\$8,000
Digital ads	\$0	\$0	\$0
Graphic design	\$8,000	\$0	\$8,000
Flyers/fact sheets printing	\$0	\$0	\$0
Translation services	\$0	\$0	\$0
Website graphic design	\$9,000	\$9,000	\$18,000
Web page translations	\$1,000	\$1,000	\$2,000
<i>Subtotal</i>	<i>\$26,000</i>	<i>\$10,000</i>	<i>\$36,000</i>
TOTAL	\$28,000	\$31,000	\$59,000

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 2021²³ and to review the CSGT program after the first year that customers are able to subscribe to the program.²⁴

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.”²⁵ 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.”²⁶ Table 10 provides this information for the PY 2024 and PY 2025 budgets.

Table 10. CPA Targeted DAC-GT and CSGT Program Capacity and Enrollment

Program Detail	DAC-GT		CSGT	
	PY 2024	PY 2025	PY 2024	PY 2025
Existing Contracted Capacity at beginning of period	7.27 MW	7.27 MW	3.37 MW	3.37 MW
Incremental Capacity targeted for procurement	11.015 MW	11.015 MW	0 MW	0 MW
Number of customers served at beginning of PY	6,510	6,510	0	0
Number of additional customer enrollments estimated	0	3,580	0	1,860
Total customer load	32,035 MWh	48,038 MWh	0 MWh	5,879 MWh

²³ Resolution E-4999, at p. 68 (OP 5).

²⁴ *Id.* at p. 31.

²⁵ Resolution E-5102, at p. 8.

²⁶ Resolution E-4999, at p. 27.

c. GHG Revenue and Public Purpose Program Fund Set Asides

Upon approval of this AL, SCE will include CPA's PY 2025 program budget in its 2025 Energy Resource Recovery Account Forecast in October 2024. 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.²⁷ CPA's 2025 Annual Budget Advice Letter will include a reconciliation of the PY 2024 budget estimate with actual expenditures, along with its PY 2026 budget forecast.

CONCLUSION

For the reasons stated in this AL, CPA requests approval of its PY 2025 budgets for its DAC-GT and CSGT programs.

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 D.24-05-065, this AL is submitted with a Tier 2 designation.

EFFECTIVE DATE

This AL will become effective on August 7, 2024, 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:

²⁷ Resolution E-4999, at pp. 26-27.

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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 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% bill discounts and renewable energy to eligible Disadvantaged Communities ("DACs") and California Indian Country (as defined in Resolution E-5212¹) 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 plans to implement similar Marketing, Education and Outreach ("ME&O") strategies for CSGT that were previously used to enroll customers into DAC-GT but at a smaller scale. This ME&O plan includes an outline of objectives, strategies, and tactics as well as associated budgets for 2025.

Program Objectives

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

- Increase awareness about how DAC-GT benefits the community and enroll participants.

The CSGT program will provide low-income customers living in disadvantaged communities within 5 miles of a community solar project site with access to locally generated, 100% renewable energy as well as a 20% discount on their electricity bills. CPA will achieve the following program objectives:

- CPA will enroll an additional 1,500 customers once the remaining 2.7 MW of CSGT projects come online in 2025 for a total of 3.37 MW serving a total of 1,860 customers. These customers will also receive 100% renewable energy at a 20% discount.
- Increase awareness about how the CSGT program benefits the community.

Target Audiences

DAC-GT	CSGT
An estimated 95,000 CPA-eligible customer accounts in DACs and California Indian	An estimated 10,000 CPA-eligible customer accounts in the eligible DACs

¹ Resolution E-5212, Approving with Modifications California Choice Energy Authority's and East Bay Community Energy's Petitions for Modification of Resolution E-4999, p. 11.

<p>Country</p> <p>Customers include:</p> <ul style="list-style-type: none"> • Renters • CARE and FERA recipients • Individually metered residents of affordable housing complexes • Monolingual non-English speakers (including Spanish, Chinese, and/or Tagalog) 	<p>Customers include:</p> <ul style="list-style-type: none"> • Renters • CARE and FERA recipients • Individually metered residents of affordable housing complexes • Monolingual non-English speakers (including Spanish, Chinese, and/or Tagalog)
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Key Messages

<p>DAC-GT</p> <ul style="list-style-type: none"> • OVERARCHING MESSAGE – The CPA’s program makes clean energy more affordable to low-income communities which otherwise may not have access to solar, wind, or other clean energy sources. • 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. 	<p>CSGT</p> <ul style="list-style-type: none"> • OVERARCHING MESSAGE – Qualifying customers save 20% off their monthly electric bill and receive 100% local renewable power. • Economic: Eligible customers receive 20% discounts. • Local pride: Clean energy projects located in customers’ neighborhoods. • 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. • CALL TO ACTION – Find out if you qualify today, learn more at SaveWithCPA.org or call 1-888-585-3788.
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Strategies

Overarching	
<ul style="list-style-type: none">• Emphasize 20% discounts for customers, as well as site sponsors.• Communicate the impact of applicable programs to each qualifying community.	
DAC-GT <ul style="list-style-type: none">• Use broad-reach media to build program awareness and impact.	CSGT <ul style="list-style-type: none">• Use targeted media in eligible census tracts to build program awareness and impact.• Leverage CPA customer database to specifically target our CARE and FERA customers in the eligible census tracts via email and direct mail.• 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

- 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

- Interviews/Endorsements
- Partners
 - Member Agencies
- Owned media including social media, website updates, and monthly emails
- Community event tabling in three - languages.

CSGT

- Direct mail
- Paid Media
- Owned media including social media, website updates, emails, webinars
- Partners
 - Community Based Organizations
 - Member Agencies

Campaign Metrics

CPA will collect the following metrics for each applicable ME&O channel for 2024 and 2025. We will evaluate the projections below and optimize them accordingly. The following information reflects data for CPA's DAC-GT and CSGT programs for Q1 2023 through Q1 2024.

DAC-GT Overall Media Impressions: 225,000 Website pageviews: 17,000 Program enrollment email open rate: 40.9% 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 Website pageviews: 100,000 Program enrollment email open rate: 35.5% Social Media Engagement Rate: 15% Number of targeted community meetings conducted: 2-5 per year
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