



# 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Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: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 proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<sup>1</sup>Discuss 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](mailto: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
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	



April 1, 2025

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

**Advice Letter CPA 0035-E**

**SUBJECT: Clean Power Alliance of Southern California's Disadvantaged Communities Green Tariff Program and Community Solar Green Tariff Program Budget Estimates for 2026**

**PURPOSE**

Pursuant to California Public Utilities Commission's ("Commission") Resolution E-4999,<sup>1</sup> Resolution E-5102,<sup>2</sup> Resolution E-5125,<sup>3</sup> and Decision ("D.") 24-05-065<sup>4</sup> 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.<sup>5</sup> 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

---

<sup>1</sup> 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).

<sup>2</sup> 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.

<sup>3</sup> 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).

<sup>4</sup> 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)).

<sup>5</sup> 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.<sup>6</sup> 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.<sup>7</sup> 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,<sup>8</sup> 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 1<sup>st</sup> of every year, starting in 2021, for the next program year.”<sup>9</sup> Resolution E-4999 provides similar reporting and budgeting requirements and outlines the descriptions to be provided for each budget line item.<sup>10</sup> 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.<sup>11</sup>

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, requires an update to the DAC-GT cost-containment cap, makes revisions to the CSGT program, changes the submission date of DAC-GT Program Administrators’ annual budget advice letters to April 1<sup>st</sup>, and requires an update to DAC-GT and CSGT tariffs.<sup>12</sup> Accordingly, CPA filed AL 0032-E to update its DAC-GT and CSGT tariffs.<sup>13</sup> On November 5, 2024, the Commission approved CPA AL 0032-E in a standard disposition letter.

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 March 1, 2023 CPA submitted AL 0021-E-A (the “2023 Budget AL”), which included budget projections for CPA’s DAC-GT and CSGT programs for Program Year (“PY”) 2024. The proposed budgets set forth in the 2023 Budget AL were subsequently approved by the Commission. A summary of CPA’s approved PY 2024 budget is presented below in Table 1.

---

<sup>6</sup> *Id.* at p. 56 (Footnote (“FN”) 36).

<sup>7</sup> Resolution E-4999, at p. 54 (OP 19).

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

<sup>9</sup> Resolution E-5102, at p. 8.

<sup>10</sup> Resolution E-4999, at pp. 67-68 (OPs 2-4).

<sup>11</sup> Resolution E-5125, at p.11 (OP 2).

<sup>12</sup> D.24-05-065, at pp. 169-171 (OPs 2 and 3).

<sup>13</sup> Advice Letter 0032-E Clean Power Alliance of Southern California’s Disadvantaged Communities Green Tariff Program and Community Solar Green Tariff Program Tariff Updates Pursuant to D.24-05-065, September 27, 2024.

**Table 1. CPA’s Approved PY 2024 Budget**

Category	DAC-GT	CSGT	Overall Total
<b>Above Market Generation Costs</b>	\$901,672	\$62,326	\$963,998
<b>20% Bill Discount</b>	\$1,924,346	\$113,288	\$2,037,633
<b>Program Administration</b>	\$255,208	\$255,208	\$510,416
<b>Marketing, Education &amp; Outreach</b>	\$25,500	\$32,000	\$57,500
<b>Independent Evaluator</b>	\$0	\$0	\$0
<b>Total</b>	\$3,106,726	\$462,822	\$3,569,548

CPA’s PY 2024 approved budget, actual expenses, and unspent balance are indicated in Table 2 below.

**Table 2. CPA’s PY 2024 Expenses and Unspent Balance**

	DAC-GT	CSGT	Total
Above Market Generation Costs	\$76,201	\$0	\$76,201
20% Bill Discount	\$1,383,100	\$0	\$1,383,100
Program Administration	\$161,147	\$29,700	\$190,847
Marketing, Education & Outreach	\$23,230	\$15,038	\$38,267
Independent Evaluator	\$0	\$0	\$0
<b>PY 2024 Actual Expenses Total</b>	\$1,643,677	\$44,748	\$1,688,415
<b>PY 2024 Approved Program Budget</b>	\$3,106,726	\$462,822	\$3,569,548
<b>PY 2024 Unspent Balance</b>	\$1,462,549	\$418,084	\$1,880,633

CPA’s figures include all realized and accrued expenses for 2024 as of the date of this AL.<sup>14</sup>

## **2. Program Budget Estimates for Program Year 2026**

For PY 2026, CPA is proposing a total budget of \$7,022,190 for the DAC-GT and CSGT programs. This includes \$5,563,648 for DAC-GT and \$1,458,542 for CSGT. Table 3 shows the proposed program budgets using the budget categories required in Resolution E-4999. The specific budget

<sup>14</sup> “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).

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 2026**

Category	DAC-GT	CSGT	Total
Above Market Generation Costs	\$2,031,147	\$758,306	\$2,789,453
20% Bill Discount	\$3,126,911	\$576,418	\$3,703,329
Program Administration	\$391,590	\$75,818	\$467,408
ME&O	\$14,000	\$48,000	\$62,000
Independent Evaluator	\$0	\$0	\$0
<b>PY 2026 Budget Total</b>	<b>\$5,563,648</b>	<b>\$1,458,542</b>	<b>\$7,022,190</b>

For PY 2026, CPA requests \$5,141,557 in total remittances, which shall be the total amount of CPA’s requested PY 2026 budget less (1) CPA’s PY 2024 unspent funds, and (2) CPA’s PY 2023 unspent funds, as detailed in Table 4 below.

**Table 4. CPA’s Remittance Request for DAC-GT and CSGT for PY 2026**

Category	DAC-GT	CSGT	Total
Above Market Generation Costs	\$2,031,147	\$758,306	\$2,789,453
20% Bill Discount	\$3,126,911	\$576,418	\$3,703,329
Program Administration	\$391,590	\$75,818	\$467,408
Marketing, Education & Outreach	\$14,000	\$48,000	\$62,000
Independent Evaluator	\$0	\$0	\$0
<b>PY 2026 Budget Subtotal</b>	<b>\$5,563,648</b>	<b>\$1,458,542</b>	<b>\$7,022,190</b>
<b>Subtract PY 2024 Unspent Funds</b>	<b>\$1,462,549</b>	<b>\$418,084</b>	<b>\$1,880,633</b>
<b>PY 2026 Remittance Request</b>	<b>\$4,101,099</b>	<b>\$1,040,458</b>	<b>\$5,141,557</b>

#### **a. Budget Details**

Resolution E-4999 requires that annual budget submissions include the following:<sup>15</sup>

- 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”)

<sup>15</sup> Resolution E-4999, at p. 67 (OP 2).

- 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 2026 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.”<sup>16</sup> The additional capacity allocated to CPA’s DAC-GT program under D.24-05-065 is 6.095 MW, in addition to CPA’s allocated capacity of 12.190 MW determined by Resolution E-4999.<sup>17</sup> Two contracts for CPA DAC-GT projects were 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 2026 in addition to generation from operational projects.

CPA has contracted for the full capacity of CSGT.<sup>18</sup> The budget estimates for the Above Market Generation Costs in PY 2026 are summarized in Table 5 below.

**Table 5: CPA’s Estimated Above Market Generation Costs for DAC-GT and CSGT for PY 2026**

	DAC-GT	CSGT	TOTAL
<b>Total customer load (kWh)</b>	48,038,490	8,855,460	56,893,950
<b>Total unsubscribed output (kWh)</b>	0	0	0
<b>Total volume (kWh)</b>	48,038,490	8,855,460	56,893,950
<b>Above Market Generation Costs</b>	\$2,031,147	\$758,306	\$2,789,453

<sup>16</sup> D. 24-05-065, at p. 170 (OP 3(e)).

<sup>17</sup> *Id.* Table 6: DAC-GT Capacity Estimates by Program Administrator, at p. 137.

<sup>18</sup> Quarterly Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs Report of Clean Power Alliance of Southern California for Fourth Quarter 2024, as submitted on January 30, 2025, Attachment A, at pp. 1-2.



## 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 2026 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 2026**

Category	DAC-GT	CSGT	Total
<b>Total New Customer Enrollment PY 20265</b>	0	0	0
<b>Cumulative Customers Enrolled<sup>19</sup></b>	10,090	1,860	11,950
<b>20 Percent Bill Discount</b>	\$3,126,911	\$576,418	\$3,703,329

## 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.<sup>20</sup>

For PY 2026, CPA estimates total Program Administration Costs of \$391,590 for DAC-GT, which is 7.0% of the total DAC-GT budget of \$5,563,648. For CSGT in PY 2026, CPA estimates total Program Administration Costs of \$75,818, which is 5.2% of the total CSGT budget of \$1,458,542.

Table 7 shows the total proposed Program Administration Costs for the two programs for PY 2026 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 2026**

Category	DAC-GT	CSGT	Total
<b>Program Management</b>	\$351,590	\$60,818	\$412,408
<b>Information Technology</b>	\$15,000	\$15,000	\$30,000
<b>Billing Operations</b>	\$0	\$0	\$0
<b>Regulatory Compliance</b>	\$0	\$0	\$0
<b>Procurement</b>	\$25,000	\$0	\$25,000
<b>Total</b>	<b>\$391,590</b>	<b>\$75,818</b>	<b>\$467,408</b>

<sup>19</sup> Program enrollment cap changes quarterly based on the ongoing average monthly kWh consumption. Enrollment cap for DAC-GT is 10,090 as of Q4 2024.

<sup>20</sup> Resolution E-4999, at p. 57 (Findings and Conclusions ¶ 41).

## 1. Program Management

CPA estimates total program management costs of \$412,408 in PY 2026 for staff time to design and initiate program implementation, marketing, and procurement, and ensure coordination with Southern California Edison Company (“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). The cost allocation approach has been revised to reflect (1) a proportional increase in contract and program management costs for DAC-GT, 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 2026.

**Table 8: Program Management Budget Details**

Position	2026 Fully Loaded Hourly Rate	2026 % Yr	2026 Hours	2026 DAC-GT Labor Spend	2026 CSGT Labor Spend	2026 Total Labor Spend
<b>Program Manager</b>	\$169.53	80%	1,664	\$238,195	\$43,900	\$282,094
<b>Program Associate</b>	\$95.50	15%	312	\$25,159	\$4,637	\$29,769
<b>Financial Manager</b>	\$183.22	10%	208	\$32,179	\$5,931	\$38,109
<b>Procurement &amp; Contracts Manager</b>	\$160.20	3.8%	80	\$12,816	\$0	\$12,816
<b>Procurement/Contracts Associate</b>	\$109.82	3.8%	80	\$8,786	\$0	\$8,786
<b>Marketing Manager</b>	\$130.79	15%	312	\$34,456	\$6,350	\$40,806
<b>Total</b>			<b>2,656</b>	<b>\$351,590</b>	<b>\$60,818</b>	<b>\$412,408</b>

## 2. Information Technology (“IT”)

CPA estimates costs of \$15,000 for the DAC-GT program and \$15,000 for the CSGT program in PY 2026 for vendor services related to IT. For the DAC-GT program, IT costs will cover enrollment process needs in CPA’s Customer Relationship Management System due to automatic enrollment in accordance with D. 24-05-065.<sup>21</sup> For the CSGT program, IT costs will cover improvements to the Customer Relationship Management System reporting and procedures for customer engagement.

<sup>21</sup> D. 24-05-065, at p. 170 (OP 3(b)).

### **3. Billing Operations**

CPA does not expect to incur any incremental billing operations costs for the DAC-GT or CSGT programs during PY 2026 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 2026, 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.

CPA does not estimate any specific procurement costs associated with the CSGT program. CPA has procured capacity for the CSGT program in an amount equal to its capacity allocation for CSGT and D.24-05-065 discontinued future solicitations for the CSGT program.<sup>22</sup>

#### **iv. ME&O Costs**

For PY 2026, CPA estimates total ME&O Costs of \$14,000 for DAC-GT, which is 0.3% percent of its total budget of \$5,563,648. For PY 2026, CPA estimates total ME&O Costs of \$48,000 for CSGT, which is 3.3% percent of its total budget of \$1,458,542.

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 2026 ME&O Costs is available in Table 9 below.

---

<sup>22</sup> *Id.* at p. 169 (OP 2).

**Table 9: CPA's Proposed ME&O Budget for DAC-GT and CSGT for PY 2026**

Category	DAC-GT	CSGT	Total
<b>Grassroots Marketing</b>			
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>
<b>Targeted Marketing</b>			
Direct mail postage/printing	\$5,000	\$8,000	\$13,000
Ethnic media radio ads	\$0	\$0	\$0
Ethnic media print ads	\$0	\$0	\$0
Graphic design	\$1,000	\$2,000	\$3,000
Translation services	\$2,000	\$2,000	\$4,000
<i>Subtotal</i>	<i>\$8,000</i>	<i>\$12,000</i>	<i>\$20,000</i>
<b>Broad-based Marketing</b>			
Social media ads	\$0	\$14,000	\$14,000
Digital ads	\$0	\$0	\$0
Graphic design	\$0	\$12,000	\$12,000
Flyers/fact sheets printing	\$0	\$0	\$0
Translation services	\$0	\$0	\$0
Website graphic design	\$3,000	\$6,000	\$9,000
Web page translations	\$1,000	\$2,000	\$3,000
<i>Subtotal</i>	<i>\$4,000</i>	<i>\$34,000</i>	<i>\$38,000</i>
<b>TOTAL</b>	<b>\$14,000</b>	<b>\$48,000</b>	<b>\$62,000</b>

## **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 2021<sup>23</sup> and to review the CSGT program after the first year that customers can begin to subscribe to the program.<sup>24</sup>

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.”<sup>25</sup> Pursuant to Resolution E-5102, CPA does 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

<sup>23</sup> Resolution E-4999, at p. 68 (OP 5).

<sup>24</sup> *Id.* at p. 31.

<sup>25</sup> Resolution E-5102, at p. 8.

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.”<sup>26</sup> Table 10 provides this information for the PY 2025 and PY 2026 budgets.

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

Program Detail	DAC-GT		CSGT	
	PY 2025	PY 2026	PY 2025	PY 2026
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	10,090	0	1,860
Number of additional customer enrollments estimated	3,580	0	1,860	0
Total customer load	48,038 MWh	48,038 MWh	2,618 MWh	8,855 MWh

### **c. GHG Revenue and Public Purpose Program Fund Set Asides**

Upon approval of this AL, SCE will include CPA’s PY 2026 program budget in its 2026 Energy Resource Recovery Account Forecast Update in November 2025. 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.<sup>27</sup> CPA’s 2026 Annual Budget Advice Letter will include a reconciliation of the PY 2025 budget estimate with actual expenditures, along with its PY 2027 budget forecast.

## **CONCLUSION**

For the reasons stated in this AL, CPA requests approval of its PY 2026 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.

<sup>26</sup> Resolution E-4999, at p. 27.

<sup>27</sup> *Id.* at pp. 26-27.

## **EFFECTIVE DATE**

This AL will become effective on May 1, 2025, which is the 30<sup>th</sup> 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](mailto: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](mailto:csong@cleanpoweralliance.org)

Clark McIsaac  
Advisor, Regulatory Affairs  
Clean Power Alliance of Southern California  
801 S. Grand Ave., Suite 400  
Los Angeles, CA 90017  
Email: [cmcisaac@cleanpoweralliance.org](mailto:cmcisaac@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](mailto: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.22-05-022 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](mailto: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-5212<sup>1</sup>) 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. CPA will conduct marketing campaigns and public outreach regarding CSGT to build customer awareness and interest in the program, enroll eligible customers in the program, and build and maintain a waitlist. CPA will initially transfer eligible DAC-GT customers to CSGT as new CSGT projects come online. CPA will conduct outreach to notify those customers of their enrollment in CSGT and the benefits the program and project provides to the customer and the community. CPA will then utilize the waitlist of enrolled, eligible customers to fill in for customers who unenroll or lose eligibility to maintain program participation at full enrollment. This ME&O plan includes an outline of objectives, strategies, and tactics as well as associated budgets for 2026.

#### **Program Objectives**

The DAC-GT program provides eligible low-income customers living in DACs 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.
- Provide participating customers with 100% renewable energy at a 20% discount.

The CSGT program will provide low-income customers living in DACs 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:

- Maintain full enrollment relative to the capacity of CPA's online CSGT projects. CPA will populate and maintain a waitlist and move customers into the program once there is space for new customers either due to unenrollment or new projects coming online. Interested customers will enroll in the program either through an online enrollment

---

<sup>1</sup> 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.

portal or by contacting CPA's customer call center.

- Increase awareness about how the CSGT program benefits the community.
- Provide participating customers with 100% renewable energy at a 20% discount.

### Target Audiences

<b>DAC-GT</b> An estimated 95,600 CPA-eligible customer accounts in DACs and California Indian Country Customers include: <ul style="list-style-type: none"><li>• Renters</li><li>• California Alternate Rates for Energy ("CARE") and Family Electric Rate Assistance Program ("FERA") recipients</li><li>• Individually metered residents of affordable housing complexes</li><li>• Monolingual non-English speakers (including Spanish, Chinese, and/or Tagalog)</li></ul>	<b>CSGT</b> An estimated 20,000 CPA-eligible customer accounts in the eligible DACs Customers include: <ul style="list-style-type: none"><li>• Renters</li><li>• CARE and FERA recipients</li><li>• Individually metered residents of affordable housing complexes</li><li>• Monolingual non-English speakers (including Spanish, Chinese, and/or Tagalog)</li></ul>
---	--

### Key Messages

<b>DAC-GT</b> <ul style="list-style-type: none"><li>• OVERARCHING MESSAGE – 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.</li><li>• Economic benefits: Meaningful monthly electric bill savings for eligible customers; no need to purchase or install any equipment.</li><li>• Equity: Access to clean power in underserved communities.</li><li>• Environmental: Customers will benefit from local renewable energy, while</li></ul>	<b>CSGT</b> <ul style="list-style-type: none"><li>• OVERARCHING MESSAGE – Qualifying customers save 20% off their monthly electric bill and receive 100% local renewable power.</li><li>• Economic: Eligible customers receive 20% discounts.</li><li>• Local pride: Clean energy projects located in customers' neighborhoods.</li><li>• Equity: Access to clean power in underserved communities.</li><li>• Environmental: Customers will benefit from local renewable energy while helping lead the way to a greener future for all.</li></ul>
--	---



helping lead the way to a greener future for all.	<ul style="list-style-type: none"> <li>• CALL TO ACTION – Find out if you qualify today, learn more at <a href="http://SaveWithCPA.org">SaveWithCPA.org</a> or call 1-888-585-3788.</li> </ul>
---	--

## **Strategies**

<b>Overarching</b>	
<ul style="list-style-type: none"> <li>• Emphasize 20% discounts for customers, as well as site sponsors.</li> <li>• Communicate the impact of applicable programs to each qualifying community.</li> </ul>	
<b>DAC-GT</b> <ul style="list-style-type: none"> <li>• No program specific strategies beyond those listed in the “overarching” section immediately above.</li> </ul>	<b>CSGT</b> <ul style="list-style-type: none"> <li>• Use targeted media in eligible census tracts to build program awareness and impact.</li> <li>• Leverage CPA customer database to specifically target our CARE and FERA customers in the eligible census tracts via email and direct mail.</li> <li>• 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.</li> </ul>

## Tactics

<p style="text-align: center;"><b>Overarching</b></p> <ul style="list-style-type: none"><li>• Press Releases for milestones such as new projects.</li><li>• 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.</li><li>• CPA will continue to target CARE and FERA customers via targeted marketing tactics.</li><li>• CPA's Community Advisory Committee will be given additional materials on how to do outreach and enrollment for CSGT within their community networks.</li><li>• 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).</li></ul>	
<p><b>DAC-GT</b></p> <ul style="list-style-type: none"><li>• Partners<ul style="list-style-type: none"><li>○ Member Agencies</li></ul></li><li>• Owned media including social media, website updates, and monthly emails</li><li>• Community event tabling in three - languages.</li></ul>	<p><b>CSGT</b></p> <ul style="list-style-type: none"><li>• Direct mail</li><li>• Paid Media</li><li>• Owned media including social media, website updates, emails, webinars</li><li>• Partners<ul style="list-style-type: none"><li>○ Community Based Organizations</li><li>○ Member Agencies</li></ul></li></ul>

## Campaign Metrics

CPA will collect the following metrics for each applicable ME&O channel for 2025 and 2026. 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 2024 through Q1 2025.

<b>DAC-GT</b> <b>Auto-Enrollment emails:</b> 1 per month  <b>Auto-Enrollment mailers:</b> 1 per month  <b>Overall Media Impressions†:</b> 243,900  <b>Website pageviews†:</b> 5,903  <b>Program auto-enrollment email open rate:</b> 7.5%  <b>Social Media Engagement Rate:</b> 15%  <b>Call center calls (by language about Power Share):</b> 5-10 English language, 1-2 Spanish language, and 0-1 Mandarin or Cantonese language calls/month  † CPA is already observing or anticipates observing reduced engagement for the DAC-GT program compared to prior program years due to auto-enrollment.	<b>CSGT</b> <b>Enrollment emails:</b> N/A*  <b>Enrollment mailers:</b> N/A*  <b>Overall Media Impressions:</b> N/A*  <b>Website pageviews:</b> N/A*  <b>Program enrollment email open rate:</b> N/A*  <b>Social Media Engagement Rate:</b> 15%  <b>Number of targeted community meetings conducted:</b> 0  *CPA reports no data for these metrics for Q1 2024 – Q1 2025 because the CSGT program launched and began enrolling CSGT participants in Q1 2025.
--	--