AGENDA

Regular Meeting of the Board of Directors of San Diego Community Power (SDCP)

December 15, 2022
5:00 p.m.

The meeting will proceed as a teleconference meeting in compliance with waivers to certain provisions of the Brown Act provided for under Government Code section 54953(e)(1)(A), in relation to the COVID-19 State of Emergency and recommended social distancing measures. There will be no location for in-person public attendance. In compliance with the Brown Act, SDCP is providing alternatives to in-person public attendance for viewing and participating in the meeting. Further details are below.

Note: Any member of the public may provide comments to the Board of Directors on any agenda item. When providing comments to the Board, it is requested that you provide your name and city of residence for the record. Commenters are requested to address their comments to the Board as a whole through the Chair. Comments may be provided in one of the following manners:

1. Providing Oral Comments During Meeting. To provide comments during the meeting, join the Zoom meeting by computer, mobile phone, or dial-in number. On Zoom video conference by computer or mobile phone, use the "Raise Hand" feature. This will notify the moderator that you wish to speak during a specific item on the agenda or during non-agenda Public Comment. Members of the public will not be shown on video but will be able to speak when called upon. If joining the meeting using the Zoom dial-in number, you can raise your hand by pressing *9. Comments will be limited to three (3) minutes. Please be aware that the Chair has the authority to reduce equally each speaker's time to accommodate a large number of speakers.

2. Written Comments. Written public comments must be submitted prior to the start of the meeting by using this (web form). Please indicate a specific agenda item when submitting your comment. All written comments received prior to the meeting will be provided to the Board members in writing. In the discretion of the Chair, the first ten (10) submitted comments shall be stated into the record of the meeting. Comments read at the meeting will be limited to the first 400 words. Comments received after the start of the meeting will be collected, sent to the Board members in writing, and be part of the public record.

If you have anything that you wish to be distributed to the Board, please provide it via info@sdcommunitypower.org and it will be distributed to the Members.

The public may participate using the following remote options:

Teleconference Meeting Webinar https://zoom.us/j/94794075133

Telephone (Audio Only) (669) 900-6833 or (346) 248-7799 | Webinar ID: 947 9407 5133

Welcome

Call to Order

Roll Call

Pledge of Allegiance

Special Presentations and Introductions

Report from Closed Session (If held)

Items to be Added, Withdrawn, or Reordered on the Agenda

Public Comments
Opportunity for members of the public to address the Board on any items not on the agenda but within the jurisdiction of the Board. Members of the public may provide a comment in either manner described above.

Consent Calendar
All matters are approved by one motion without discussion unless a member of the Board of Directors requests a specific item to be removed from the Consent Calendar for discussion. A member of the public may comment on any item on the Consent Calendar in either manner described above.

1. **Approval of Findings to Continue Holding Remote/Teleconference Meetings Pursuant to Assembly Bill 361**
2. **Receive and File Treasurer's Report for Period Ending October 31, 2022**
3. **Receive and File Update on Back Office Operations**
4. **Receive and File Update on Marketing and Public Relations**
5. **Receive and File Update on Community Advisory Committee**

Regular Agenda
The following items call for discussion or action by the Board of Directors. The Board may discuss and/or take action on any item listed below if the Board is so inclined.

6. **Approval of the Community Clean Energy Innovation Grants Policy**

   Recommendation: Approve the Community Clean Energy Innovation Grants Policy

7. **Update on The Community Power Plan (CPP) Community Needs Survey**

   Recommendation: Receive and file the update on the Community Power Plan (CPP) community needs survey.

8. **Update on the Net Energy Metering (NEM) Proceeding and Update on Regulatory and Legislative Affairs**

   Receive and File update on the Net Energy Metering (NEM) proceeding and the update on regulatory and legislative affairs.

9. Updates to Board Compensation and Reimbursement Policy

Recommendation: Approval of Resolution No. 2022-21 amending the Board Compensation and Reimbursement Policy to Include Meetings of Board Committees.

Director Initiated Items

10. Consider SDCP Actions Necessary to Accelerate Achievement of 100% Renewable Energy Portfolio

(Consideration of a Request by Director Lawson-Remer)

Recommended Action:

1. Discuss SDCP actions necessary to do the following:
   a. Align default and opt-in service tiers with previously adopted operational goals regarding gradual achievement of an 100% renewable energy portfolio;
   b. Increase default service tier to 75% by 2027 and 100% by 2030; and
   c. Establish a temporary service tier, if needed.

2. Consider directing SDCP staff to prepare the necessary documents, including a potential amendment to the Joint Powers Agreement and/or any updated Board Policies, as needed, and place the documents and options for action on a future SDCP agenda for consideration no later than April 2023.

3. Consider directing SDCP staff to prepare a targeted impact analysis of these potential changes, focused specifically on energy procurement from local in-fill solar versus large scale solar development projects, to assess and ensure that updates to default opt-in tiers would not hinder SDCP's ability to accelerate development of and procurement from rooftop and in-fill solar.

Reports by Chief Executive Officer and General Counsel

SDCP Management and General Counsel may briefly provide information to the Board and the public. The Board may engage in discussion if the specific subject matter of the report is identified below, but the Board may not take any action other than to place the matter on a future agenda. Otherwise, there is to be no discussion or action taken unless authorized by law.

Director Comments

Board Members may briefly provide information to other members of the Board and the public, ask questions of staff, request an item to be placed on a future agenda, or report on conferences, events, or activities related to SDCP business. There is to be no discussion or action taken on comments made by Directors unless authorized by law.

Adjournment

Compliance with the Americans with Disabilities Act

SDCP Board of Directors meetings comply with the protections and prohibitions of the Americans with Disabilities Act. Individuals with a disability who require a modification or accommodation, including auxiliary aids or services, in order to participate in the public meeting may contact (888) 382-0169 or info@sdcommunitypower.org. Requests for disability-related modifications or accommodations require different lead times and should be provided at least 72-hours in advance of the public meeting.

Availability of Board Documents

Copies of the agenda and agenda packet are available at https://sdcommunitypower.org/resources/meeting-notes/. Late-arriving documents related to a Board meeting item which are distributed to a majority of the Members prior to or during the Board meeting are available for public review as required by law. Public records, including agenda-related documents, can be requested electronically at info@sdcommunitypower.org or by mail to SDCP, PO BOX 12716, San Diego, CA 92112. The documents may also be posted at the above website. Such public records are also available for inspection, by appointment, at San Diego Community Power, 2488 Historic Decatur Road, Suite 250, San Diego, CA 92106. Please contact info@sdcommunitypower.org to arrange an appointment.

SAN DIEGO COMMUNITY POWER

SAN DIEGO COMMUNITY POWER
Staff Report – Item 1

To: San Diego Community Power Board of Directors

From: Ryan Baron, General Counsel

Subject: Findings to Continue Holding Remote/Teleconference Meetings Pursuant to Assembly Bill 361

Date: December 15, 2022

RECOMMENDATION

Find and determine that the Board has reconsidered the circumstances of the COVID-19 State of Emergency; the State of Emergency remains in effect; state or local officials continue to impose or recommend social distancing measures; and meetings of SDCP legislative bodies may be held remotely in compliance with Government Code section 54953(e) for the next 30 days.

BACKGROUND

As more fully described in the staff report for the October 28, 2021 meeting related to AB 361, the State of California has adopted AB 361, which allows public agencies to hold fully or partially virtual meetings under certain circumstances without being required to follow certain Brown Act teleconferencing requirements. Under AB 361, a legislative body holding a fully or partially virtual meeting pursuant to AB 361 must make certain findings at least every thirty (30) days to continue holding such meetings.

If the Board desires to continue allowing Directors and members of SDCP committees to participate remotely pursuant to AB 361, the Board must reconsider the COVID-19 State of Emergency, find that the proclaimed State of Emergency remains in effect, and find either: (1) that state or local officials continue to impose or recommend measures to promote social distancing; or (2) that as a result of the COVID-19 emergency, meeting in person would present imminent risks to the health or safety of attendees.

ANALYSIS AND DISCUSSION

Based on the continued COVID-19 State of Emergency and continued required or recommended social distancing measures, as initially described in the staff report for October 28, 2021 meeting relating to AB 361, the Board may make the findings necessary to continue allowing Board members and members of all SDCP committees to participate remotely pursuant to AB 361.

FISCAL IMPACT
None.

ATTACHMENTS
None.

SAN DIEGO COMMUNITY POWER
Staff Report – Item 2

To:	San Diego Community Power Board of Directors
From:	Eric W. Washington, Chief Financial Officer
Via:	Karin Burns, Chief Executive Officer
Subject:	Treasurer's Report –Presentation of Financial Results for Fiscal Year 2023 Period ended 10/31/22
Date:	December 15, 2022

RECOMMENDATION
Receive and File Report

BACKGROUND
San Diego Community Power (SDCP) maintains its accounting records on a full accrual basis in accordance with Generally Accepted Accounting Principles (GAAP) as applicable to governmental enterprise funds.

SDCP has prepared its year-to-date financial statements for the period ended October 31, 2022, along with budgetary comparisons.

ANALYSIS AND DISCUSSION
Actual financial results for the period ended 10/31/22: $371.7 million in net operating revenues were reported compared to $336.67 million budgeted for the period. $328.08 million in total expenses were reported (including $319.58 million in energy costs) compared to $290.35 million budgeted for the period (including $278.24 million budgeted for energy costs). After expenses, SDCP's change in net position of $43.63 million was reported for Fiscal Year 2023. The following is a summary of the actual results compared to the Fiscal Year 2023 Budget.

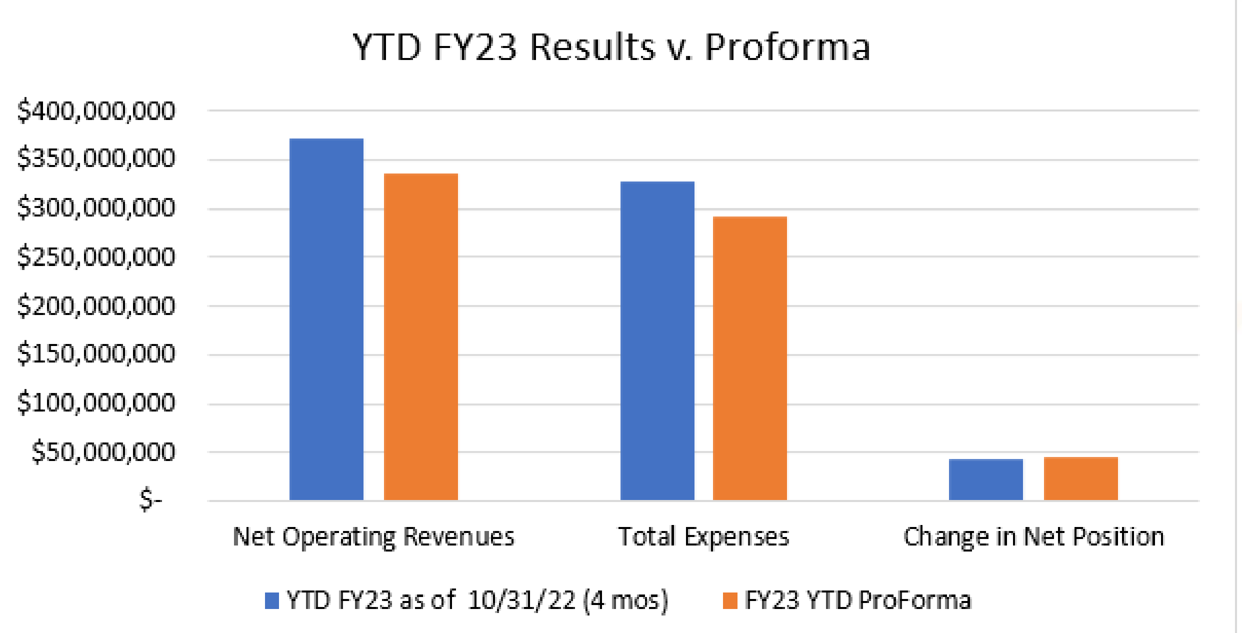
Budget Comparison				
	YTD FY23 as of 10/31/22 (4 mos)	FY23 YTD Budget	Budget Variance ($)	Budget (%)
Net Operating Revenues	$ 371,719,619	$ 336,668,664	$ 35,050,955	10%
Total Expenses	$ 328,083,413	$ 290,350,806	$ 37,732,607	13%
Change in Net Position	$ 43,636,206	$ 46,317,858	$ (2,681,652)	

- Net operating revenues finished $35.05 million (or 10.0 percentage points) over the budget primarily due to opt outs performing better than projected and due to higher demand from non-residential customers.
- Operating expenses finished $37.73 million (or 13.0 percentage points) over the budget primarily due to higher-than-expected energy usage and energy costs.

Financial results for the period performed under the projections presented in the year-to-date proforma. SDCP's change in net position was -4.21% under the projection primarily due to higher-than projected energy usage and costs.

The following is a summary to actual results compared to the fiscal year-to-date proforma.

Proforma Comparison				
	YTD FY23 as of 10/31/22 (4 mos)	FY23 YTD ProForma	ProForma Variance ($)	Proforma (%)
Net Operating Revenues	$ 371,719,619	$ 336,668,664	$ 35,050,955	10.41%
Total Expenses	$ 328,083,413	$ 291,113,945	$ 36,969,468	12.70%
Change in Net Position	$ 43,636,206	$ 45,554,719	$ (1,918,513)	-4.21%



For the period ending 10/31/22, SDCP contributed $43,636,206 to its reserves but was expecting to contribute $46,317,858 per the FY 2022-23 adopted budget. Total SDCP reserves (net position) at the end of the period were $86,167,158 and total available liquidity (including lines of credit) was $61,633,026. SDCP has a total FY 2022-23 year-end reserve target of $171,276,631, which is equivalent to 90-days of total operating expenses.

COMMITTEE REVIEW

The report is scheduled for review by the Financial Risk Management Committee (FRMC) on December 7, 2022

FISCAL IMPACT

N/A

ATTACHMENTS

Attachment A: 2023 Year-to-Date Period Ended 10/31/22 Financial Statements

MAHER
ACCOUNTANCY

ACCOUNTANTS' COMPILATION REPORT

Management
San Diego Community Power

Management is responsible for the accompanying financial statements of San Diego Community Power (a California Joint Powers Authority) which comprise the statement of net position as of October 31, 2022, and the related statement of revenues, expenses, and changes in net position, and the statement of cash flows for the period then ended in accordance with accounting principles generally accepted in the United States of America. We have performed a compilation engagement in accordance with Statements on Standards for Accounting and Review Services promulgated by the Accounting and Review Services Committee of the AICPA. We did not audit or review the accompanying statements nor were we required to perform any procedures to verify the accuracy or completeness of the information provided by management. Accordingly, we do not express an opinion, conclusion, nor provide any assurance on these financial statements.

Management has elected to omit substantially all of the note disclosures required by accounting principles generally accepted in the United States of America in these interim financial statements. San Diego Community Power's annual audited financial statements include the note disclosures omitted from these interim statements. If the omitted disclosures were included in these financial statements, they might influence the user's conclusions about the Authority's financial position, results of operations, and cash flows. Accordingly, these financial statements are not designed for those who are not informed about such matters.

We are not independent with respect to the Authority because we performed certain accounting services that impaired our independence.

Maher Accountancy

San Rafael, CA
November 28, 2022

1101 Fifth Avenue, Suite 200 San Rafael, CA 94901 415 459 1249 mahercpa.com

SAN DIEGO COMMUNITY POWER
STATEMENT OF NET POSITION
As of October 31, 2022

ASSETS	
Current assets	
Cash and cash equivalents	$ 45,153,108
Accounts receivable, net	100,081,387
Accrued revenue	50,188,866
Prepaid expenses	1,431,242
Other receivables	1,989,860
Deposits	17,517,479
Total current assets	216,361,942
Noncurrent assets	
Restricted cash	7,500,000
Deposits	3,450,000
Total noncurrent assets	10,950,000
Total assets	227,311,942
LIABILITIES	
Current liabilities	
Accrued cost of energy	103,312,220
Accounts payable	618,927
Other accrued liabilities	2,213,042
State surcharges payable	186,156
Security deposits	624,000
Interest payable	152,616
Total current liabilities	107,106,961
Noncurrent liabilities	
Other noncurrent liabilities	517,741
Bank note payable	33,520,082
Total noncurrent liabilities	34,037,823
Total liabilities	141,144,784
NET POSITION	
Restricted for collateral	2,500,000
Unrestricted	83,667,158
Total net position	$ 86,167,158

SAN DIEGO COMMUNITY POWER
STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET POSITION
Four Months Ended October 31, 2022

OPERATING REVENUES	
Electricity sales, net	$ 371,694,287
Total operating revenues	371,694,287
OPERATING EXPENSES	
Cost of energy	319,580,011
Contract services	5,328,422
Staff compensation	1,728,772
General and administration	1,044,441
Total operating expenses	327,681,646
Operating income (loss)	44,012,641
NON-OPERATING REVENUES (EXPENSES)	
Investment income	25,332
Interest and financing expense	(401,767)
Nonoperating revenues (expenses)	(376,435)
CHANGE IN NET POSITION	43,636,206
Net position at beginning of period	42,530,952
Net position at end of period	$ 86,167,158

See accountants' compilation report.

SAN DIEGO COMMUNITY POWER
STATEMENT OF CASH FLOWS
Four Months Ended October 31, 2022

CASH FLOWS FROM OPERATING ACTIVITIES	
Receipts from customers	$ 319,507,843
Other operating receipts	1,186,596
Payments to suppliers for electricity	(260,140,922)
Payments for goods and services	(5,049,943)
Payments to employees for services	(1,580,798)
Payments for deposits and collateral	(66,785,072)
Payments for state surcharges	(903,633)
Net cash provided (used) by operating activities	(13,765,929)
CASH FLOWS FROM NON-CAPITAL FINANCING ACTIVITIES	
Proceeds from loans	20,180,000
Principal payments - loans	(18,000,000)
Principal payments - note	(5,000,000)
Interest and related expense payments	(363,013)
Net cash provided (used) by non-capital financing activities	(3,183,013)
CASH FLOWS FROM INVESTING ACTIVITIES	
Interest income received	25,332
Net change in cash and cash equivalents	(16,923,610)
Cash and cash equivalents at beginning of period	69,576,718
Cash and cash equivalents at end of period	$ 52,653,108
Reconciliation to the Statement of Net Position	
Cash and cash equivalents (unrestricted)	$ 45,153,108
Restricted cash	7,500,000
Cash and cash equivalents	$ 52,653,108

See accountants' compilation report.

SAN DIEGO COMMUNITY POWER
STATEMENT OF CASH FLOWS (continued)
Four Months Ended October 31, 2022

RECONCILIATION OF OPERATING INCOME TO NET CASH PROVIDED (USED) BY OPERATING ACTIVITIES

Operating income	$ 44,012,641
Adjustments to reconcile operating income (loss) to net cash provided (used) by operating activities	
Provision for uncollectible accounts	3,754,488
(Increase) decrease in:	
Accounts receivable	(53,448,885)
Accrued revenue	(3,249,251)
Other receivables	(1,989,860)
Prepaid expenses	3,030,066
Deposits	(11,276,422)
Increase (decrease) in:	
Accrued cost of electricity	46,080,715
Accounts payable	(6,027)
Other accrued liabilities	1,473,036
State surcharges payable	(146,430)
Supplier security deposits	(42,000,000)
Net cash provided (used) by operating activities	$ (13,765,929)

ACCOUNTANTS' COMPILATION REPORT

Board of Directors
San Diego Community Power

Management is responsible for the accompanying special purpose budgetary comparison schedule of San Diego Community Power (SDCP), a California Joint Powers Authority, for the period ended October 31, 2022, and for determining that the budgetary basis of accounting is an acceptable financial reporting framework. We have performed a compilation engagement in accordance with Statements on Standards for Accounting and Review Services promulgated by the Accounting and Review Services Committee of the AICPA. We did not audit or review the accompanying statement nor were we required to perform any procedures to verify the accuracy or completeness of the information provided by management. Accordingly, we do not express an opinion, a conclusion, nor provide any assurance on this special purpose budgetary comparison statement.

The special purpose statement is prepared in accordance with the budgetary basis of accounting, which is a basis of accounting other than accounting principles generally accepted in the United States of America. This report is intended for the information of the Board of Directors of SDCP.

Management has elected to omit substantially all of the note disclosures required by accounting principles generally accepted in the United States of America in these interim financial statements. SDCP's annual audited financial statements will include the note disclosures omitted from these interim statements. If the omitted disclosures were included in these financial statements, they might influence the user's conclusions about the Authority's financial position, results of operations, and cash flows. Accordingly, these financial statements are not designed for those who are not informed about such matters.

We are not independent with respect to SDCP because we performed certain accounting services that impaired our independence.

Maher Accountancy

San Rafael, CA
November 28, 2022

SAN DIEGO COMMUNITY POWER
BUDGETARY COMPARISON SCHEDULE
Four Months Ended October 31, 2022

	2022/23 YTD Budget	2022/23 YTD Actual	2022/23 YTD Budget Variance (Under) Over	2022/23 YTD Actual/ Budget %	2022/23 Annual Budget	2022/23 Budget Remaining
REVENUES AND OTHER SOURCES						
Gross Ratepayer Revenues	340,069,358	$ 375,448,775	35,379,417	110%	$ 716,146,107	$ 340,697,332
Less Uncollectible Customer Accounts	(3,400,694)	(3,754,488)	(353,794)	110%	(7,161,461)	(3,406,973)
Total Revenues and Other Sources	336,668,664	371,694,287	35,025,623		708,984,646	337,290,359
OPERATING EXPENSES						
Cost of Energy	278,236,285	319,580,011	41,343,726	115%	661,638,828	342,058,817
Professional Services and Consultants	5,644,069	5,178,122	(465,947)	92%	16,881,036	11,702,914
Personnel Costs	2,269,869	1,728,772	(541,097)	76%	7,951,499	6,222,727
Marketing and Outreach	1,455,333	822,820	(632,513)	57%	4,164,167	3,341,347
General and Administrative	1,618,224	371,911	(1,246,313)	23%	2,591,363	2,219,452
Programs	688,333	-	(688,333)	0%	1,395,000	1,395,000
Total Operating Expenses	289,912,113	327,681,636	37,769,523		694,621,893	366,940,257
Operating Income (Loss)	46,756,551	44,012,651	(2,743,900)		14,362,753	(29,649,898)
NON-OPERATING REVENUES (EXPENSES)						
Investment income	-	25,332	25,332		-	(25,332)
Debt Service and Bank Fees	(438,693)	(401,777)	36,916	92%	(1,314,922)	(913,145)
Total Non-Operating Revenues (Expenses)	(438,693)	(376,445)	62,248		(1,314,922)	(938,477)
CHANGE IN NET POSITION	$ 46,317,858	$ 43,636,206	$ (2,681,652)		$ 13,047,831	$ (30,588,375)

See accountants' compilation report.

SAN DIEGO COMMUNITY POWER

FY23 - Supplemental Budget Details

Four Months Ended October 31, 2022

	2022/23 YTD Budget	2022/23 YTD Actual	2022/23 YTD Budget Variance (Under) Over	2022/23 YTD Actual/ Budget %	2022/23 Annual Budget	2022/23 Budget Remaining
OPERATING REVENUES						
Gross Ratepayer Revenues	$ 340,069,358	$ 375,448,775	$ 35,379,417	110%	$ 716,146,107	$ 340,697,332
Less Uncollectible Accounts	(3,400,694)	(3,754,488)	(353,794)	110%	(7,161,461)	(3,406,973)
Net Operating Revenues	336,668,664	371,694,287	35,025,623		708,984,646	337,290,359
OPERATING EXPENSES						
Cost of Energy	278,236,285	319,580,011	41,343,726	115%	661,638,828	342,058,817
Professional Services and Consultants						
Data Management	3,125,300	2,815,917	(309,383)	90%	10,541,810	7,725,893
SDG&E Fees	725,764	1,190,187	464,423	164%	2,563,226	1,373,039
Technical Support	445,003	211,440	(233,563)	48%	1,335,000	1,123,560
Legal/Regulatory	453,336	456,763	3,427	101%	1,330,000	873,237
Other Services	894,667	503,815	(390,852)	56%	1,111,000	607,185
Total	5,644,070	5,178,122	(465,948)		16,881,036	11,702,914
Personnel Costs						
Salaries	1,864,139	1,508,568	(355,571)	81%	6,233,063	4,724,495
Benefits (retirement/health)	297,854	139,637	(158,217)	47%	1,274,972	1,135,335
Payroll Taxes	107,877	80,567	(27,310)	75%	443,464	362,897
Total	2,269,870	1,728,772	(541,098)		7,951,499	6,222,727
Marketing and Outreach						
Printing	1,096,332	497,098	(599,234)	45%	2,323,000	1,825,902
Sponsorships/Local Memberships	225,000	175,422	(49,578)	78%	1,199,167	1,023,745
Communications Consultants	134,000	150,300	16,300	112%	642,000	491,700
Total	1,455,332	822,820	(632,512)		4,164,167	3,341,347
General and Administration						
Other G&A	1,432,988	145,489	(1,287,499)	10%	2,037,461	1,891,972
Cal CCA Dues	123,333	121,994	(1,339)	99%	370,000	248,006
Rent	58,000	58,325	325	101%	180,000	121,675
Insurance	3,902	46,104	42,202	1182%	3,902	(42,202)
Total	1,618,223	371,912	(1,246,311)		2,591,363	2,219,451
Programs						
Programs	688,333	-	(688,333)	0%	1,395,000	1,395,000
Programs (Cost-Recovery)	-	-	-	0%	-	-
Total	688,333	-	(688,333)		1,395,000	1,395,000
Total Operating Expenses	289,912,113	327,681,637	37,769,524		694,621,893	366,940,256
Operating Income (Loss)	46,756,551	44,012,650	(2,743,901)		14,362,753	(29,649,897)
NON-OPERATING REVENUES (EXPENSES)						
Investment income	-	25,332	25,332		-	(25,332)
Interest and Related Expenses	(438,693)	(401,777)	36,916	0%	(1,314,922)	(913,145)
Total Non-Operating Rev (Exp)	(438,693)	(376,445)	62,248		(1,314,922)	(938,477)
CHANGE IN NET POSITION	$ 46,317,858	$ 43,636,205	$ (2,681,653)		$ 13,047,831	$ (30,588,374)

SAN DIEGO COMMUNITY POWER
Staff Report – Item 3

To:	San Diego Community Power Board of Directors
From:	Lucas Utouh, Director of Data Analytics and Account Services
Via:	Karin Burns, Chief Executive Officer
Subject:	Update on Back-Office Operations
Date:	December 15, 2022

RECOMMENDATION

Receive and file update on various back-office operations.

BACKGROUND

Staff will provide regular updates to the Board of Directors regarding San Diego Community Power's (SDCP) back-office activities centered around tracking opt actions (i.e., opt outs, opt ups and opt downs) as well as customer engagement metrics. The following is a brief overview of items pertaining to back-office operations.

ANALYSIS AND DISCUSSION

A) Phase 3 Enrollment Update

Staff is happy to report that our Phase 3 efforts for Imperial Beach, La Mesa, Encinitas, Chula Vista, San Diego and Net Energy Metering (NEM) customers with a true up month of February through November are now complete. Our cumulative count of active accounts being served under our portfolio currently stands at **738,857** as of 12/08/2022, cementing San Diego Community Power as the 2nd largest CCA by accounts served in the State of California. Net Energy Metering (NEM) customers with a true up month of **December** are currently in the process of being transitioned over to our service and the enrollment process for NEM customers will continue until January of 2023.

B) Customer Participation Tracking

Staff and Calpine have worked together to create a reporting summary of customer actions to opt out of SDCP service, opt up to Power100, or opt down from Power100 to PowerOn. The below charts summarize these actions accordingly as of December 4th, 2022:

I. Opt Outs

Opt Outs by Jurisdiction	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-MTD	Grand Total
CITY OF CHULA VISTA	2	77	1	150	9	3	11	12	1	0	0	21	19	159	814	305	279	545	308	243	336	327	17	3639
CITY OF ENCINITAS	0	0	3	32	7	11	5	3	1	1	3	60	304	753	191	102	77	97	65	62	85	53	9	1924
CITY OF IMPERIAL BEACH	0	0	0	11	0	1	1	0	0	0	19	129	22	13	24	15	10	23	40	31	12	18	1	370
CITY OF LA MESA	0	0	15	51	3	6	3	0	6	0	1	158	372	93	122	50	47	122	106	59	72	42	7	1335
CITY OF SAN DIEGO	14	10	43	516	51	123	111	131	34	23	21	152	194	1501	6425	1645	1349	2809	1648	1122	1109	755	113	19899
Grand Total	**16**	**87**	**62**	**760**	**70**	**144**	**131**	**146**	**42**	**24**	**44**	**520**	**911**	**2519**	**7576**	**2117**	**1762**	**3596**	**2167**	**1517**	**1614**	**1195**	**147**	**27167**

Opt Outs by Class Code	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-MTD	Grand Total
Residential	0	0	0	0	0	0	0	0	0	0	36	501	867	2473	7493	2089	1734	3519	2090	1464	1571	1170	147	25154
Commercial/Industrial	16	87	62	760	70	144	131	146	42	24	8	19	44	46	83	28	28	77	77	53	43	25	0	2013
Grand Total	**16**	**87**	**62**	**760**	**70**	**144**	**131**	**146**	**42**	**24**	**44**	**520**	**911**	**2519**	**7576**	**2117**	**1762**	**3596**	**2167**	**1517**	**1614**	**1195**	**147**	**27167**

Opt Outs by Reason	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-MTD	Grand Total
Concerns about Government-Run Power Agency	0	0	2	15	2	2	2	0	0	0	1	33	53	198	600	190	87	81	77	57	58	42	6	1506
Concerns about lack of equivalent CCA programs	0	0	0	0	0	0	0	0	0	0	0	3	8	10	48	8	12	14	8	4	4	5	3	127
Decline to Provide	0	4	19	11	25	33	31	94	1	1	9	96	152	432	1243	403	210	389	166	149	148	115	13	3744
Dislike being automatically enrolled	0	0	28	59	23	18	34	16	3	4	17	142	257	743	2443	611	483	765	523	421	369	273	43	7275
Have renewable Energy Reliability Concerns	0	0	0	3	0	2	7	0	0	0	1	4	7	49	118	37	17	14	15	12	8	6	2	302
Other	1	83	2	667	12	18	3	7	8	3	8	69	126	325	1030	223	156	279	131	91	105	78	11	3436
Rate or Cost Concerns	15	0	11	5	8	70	50	29	29	16	6	95	174	493	1170	344	521	1724	1023	617	758	530	53	7741
Service or Billing Concerns	0	0	0	0	0	1	4	0	1	0	0	17	22	53	151	58	62	101	56	59	58	53	4	700
Existing relationship with the utility	0	0	0	0	0	0	0	0	0	0	2	61	112	216	773	243	214	229	168	107	106	93	12	2336
Grand Total	**16**	**87**	**62**	**760**	**70**	**144**	**131**	**146**	**42**	**24**	**44**	**520**	**911**	**2519**	**7576**	**2117**	**1762**	**3596**	**2167**	**1517**	**1614**	**1195**	**147**	**27167**

Opt Outs by Method	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-MTD	Grand Total
Customer Service Rep (CSR)	0	83	31	681	23	67	73	84	23	17	16	147	259	462	1661	504	607	1212	760	436	429	328	21	7924
Interactive Voice Response (IVR)	0	0	1	8	5	27	22	9	16	4	9	55	45	423	1374	384	322	748	486	361	319	235	29	4882
Website	16	4	30	71	42	50	36	53	3	3	19	318	607	1634	4541	1229	833	1636	921	720	866	632	97	14361
Grand Total	**16**	**87**	**62**	**760**	**70**	**144**	**131**	**146**	**42**	**24**	**44**	**520**	**911**	**2519**	**7576**	**2117**	**1762**	**3596**	**2167**	**1517**	**1614**	**1195**	**147**	**27167**

II. Opt Ups to Power100

Opt Ups by Jurisdiction	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-MTD	Grand Total
CITY OF CHULA VISTA	0	56	0	0	626	9	4	1	4	1	1	6	3	13	52	12	13	18	9	11	9	16	0	864
CITY OF ENCINITAS	0	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	19
CITY OF IMPERIAL BEACH	0	0	0	0	0	60	0	0	0	0	0	2	23	1	1	1	0	0	1	0	0	0	0	89
CITY OF LA MESA	0	0	12	0	130	3	0	3	0	0	0	6	32	15	29	11	4	7	4	5	1	4	0	266
CITY OF SAN DIEGO	0	133	1	2	2922	12	22	10	48	2	11	25	106	172	1210	215	209	201	215	297	85	85	10	5993
Grand Total	**0**	**207**	**13**	**2**	**3678**	**84**	**26**	**14**	**52**	**3**	**12**	**39**	**164**	**201**	**1292**	**239**	**226**	**226**	**229**	**313**	**96**	**105**	**10**	**7231**

Opt Ups by Class Code	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-MTD	Grand Total
Residential	0	2	0	0	0	0	0	0	0	0	1	15	151	179	1179	233	224	169	211	301	79	86	10	2840
Commercial/Industrial	0	205	13	2	3678	84	26	14	52	3	11	24	13	22	113	6	2	57	18	12	17	19	0	4391
Grand Total	**0**	**207**	**13**	**2**	**3678**	**84**	**26**	**14**	**52**	**3**	**12**	**39**	**164**	**201**	**1292**	**239**	**226**	**226**	**229**	**313**	**96**	**105**	**10**	**7231**

Opt Ups by Method	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-MTD	Grand Total
Customer Service Rep (CSR)	0	207	11	1	3668	80	23	12	48	3	7	25	151	47	857	38	28	67	42	34	34	33	3	5419
Interactive Voice Response (IVR)	0	0	0	0	3	0	0	0	0	0	1	0	0	4	18	12	6	5	7	6	6	8	0	76
Web	0	0	2	1	7	4	3	2	4	0	4	14	13	150	417	189	192	154	180	273	56	64	7	1736
Grand Total	**0**	**207**	**13**	**2**	**3678**	**84**	**26**	**14**	**52**	**3**	**12**	**39**	**164**	**201**	**1292**	**239**	**226**	**226**	**229**	**313**	**96**	**105**	**10**	**7231**

Cumulative Power 100 Dashboard

Opt Ups by Jurisdiction	Grand Total
CITY OF CHULA VISTA	863
CITY OF ENCINITAS	24796
CITY OF IMPERIAL BEACH	88
CITY OF LA MESA	264
CITY OF SAN DIEGO	5966
Grand Total	**31977**

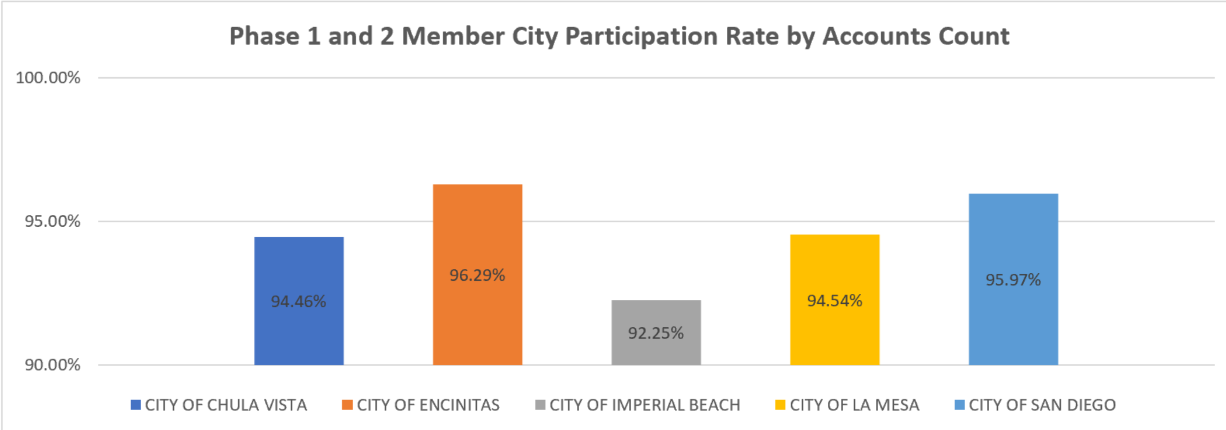
III. Opt Downs from Power100

Opt Downs by Jurisdiction	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-MTD	Grand Total
CITY OF CHULA VISTA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
CITY OF ENCINITAS	0	0	0	0	24	8	1	1	1	0	0	5	34	127	56	40	52	40	15	17	22	7	2	452
CITY OF IMPERIAL BEACH	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1
CITY OF LA MESA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	2
CITY OF SAN DIEGO	0	0	0	0	0	0	0	0	0	0	0	0	1	2	2	5	1	6	6	3	1	0	0	27
Grand Total	**0**	**0**	**0**	**0**	**24**	**8**	**1**	**1**	**1**	**0**	**0**	**5**	**35**	**129**	**58**	**45**	**54**	**49**	**21**	**20**	**23**	**7**	**2**	**483**

Opt Downs by Class Code	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-MTD	Grand Total
Residential	0	0	0	0	0	0	0	0	0	0	0	4	31	128	58	43	51	46	20	13	23	7	2	426
Commercial/Industrial	0	0	0	0	24	8	1	1	1	0	0	1	4	1	0	2	3	3	1	7	0	0	0	57
Grand Total	**0**	**0**	**0**	**0**	**24**	**8**	**1**	**1**	**1**	**0**	**0**	**5**	**35**	**129**	**58**	**45**	**54**	**49**	**21**	**20**	**23**	**7**	**2**	**483**

Opt Downs by Method	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-MTD	Grand Total
Customer Service Rep (CSR)	0	0	0	0	22	6	1	1	1	0	0	4	30	96	26	24	41	29	13	14	15	7	2	332
Interactive Voice Response (IVR)	0	0	0	0	2	2	0	0	0	0	0	0	0	17	2	1	3	3	0	0	0	0	0	30
Web	0	0	0	0	0	0	0	0	0	0	0	1	5	16	30	20	10	17	8	6	8	0	0	121
Grand Total	**0**	**0**	**0**	**0**	**24**	**8**	**1**	**1**	**1**	**0**	**0**	**5**	**35**	**129**	**58**	**45**	**54**	**49**	**21**	**20**	**23**	**7**	**2**	**483**

IV. Participation Rate.



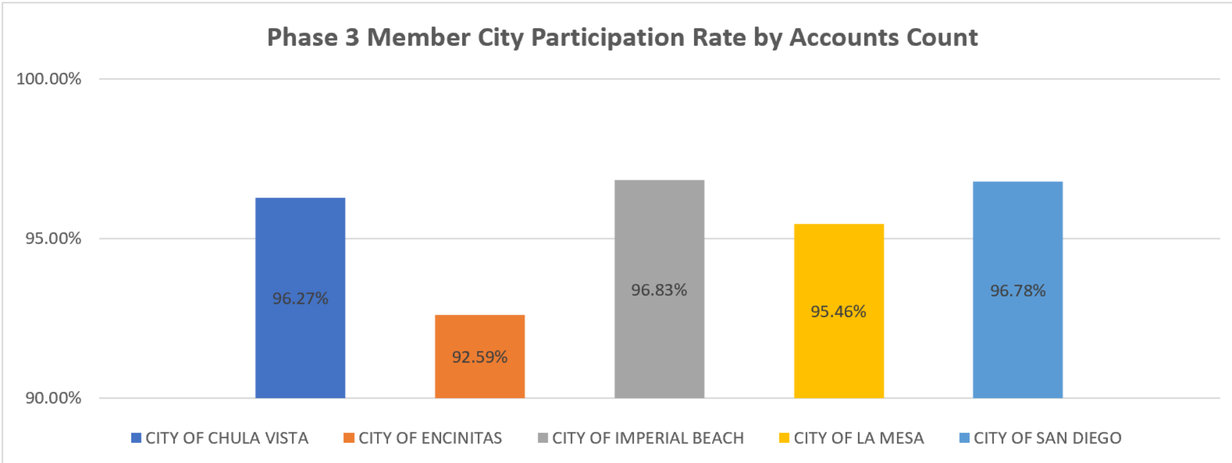
Phase 1 and 2

Town or Territory	Active	Eligible	Total Opt Outs	Participation Rate by Accounts Count
CITY OF CHULA VISTA	7660	8109	449	94.46%
CITY OF ENCINITAS	3141	3262	121	96.29%
CITY OF IMPERIAL BEACH	536	581	45	92.25%
CITY OF LA MESA	2703	2859	156	94.54%
CITY OF SAN DIEGO	57164	59567	2403	95.97%
Grand Total	**71204**	**74378**	**3174**	**95.73%**

For Phase 3, the participation rate is fluid and will change as we continue with mass enrollment across all member cities for customers on Net Energy Metering (NEM) throughout 2022. The true participation rate for this phase will be computed once all NEM and Non-NEM customers across our member cities and are fully enrolled. In the interim, we are reporting on the opt outs and eligible accounts associated with the phase on a rolling basis as of the reporting month:

Phase 3

Town or Territory	Active	Eligible	Total Opt Outs	Participation Rate by Accounts Count
CITY OF CHULA VISTA	82522	85715	3193	96.27%
CITY OF ENCINITAS	22493	24293	1800	92.59%
CITY OF IMPERIAL BEACH	9917	10242	325	96.83%
CITY OF LA MESA	24781	25960	1179	95.46%
CITY OF SAN DIEGO	525769	543265	17496	96.78%
Grand Total	**665482**	**689475**	**23993**	**96.52%**



C) Contact Center Metrics

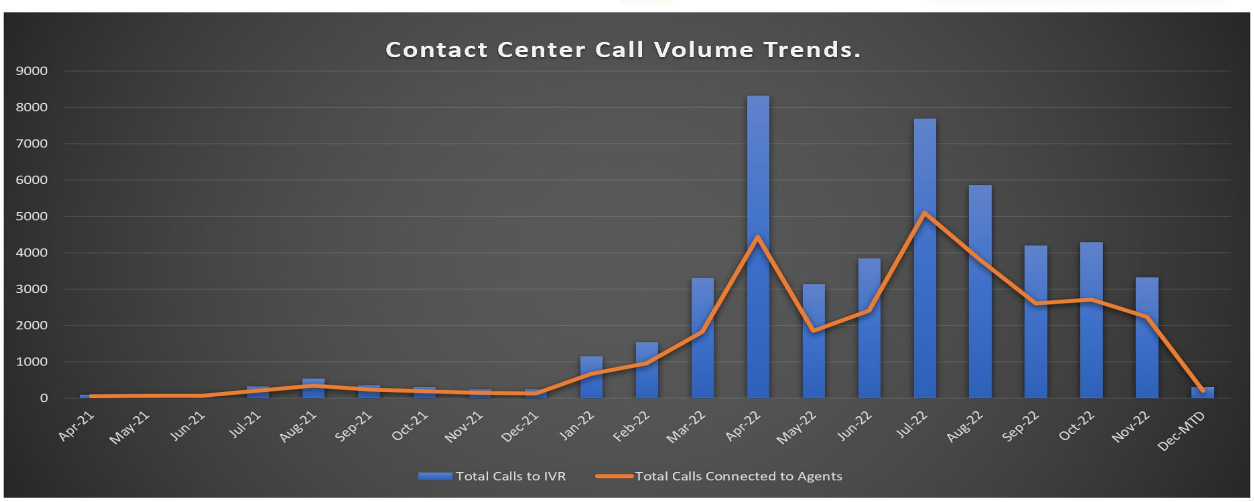
Call volumes in the month of November were approximately 22% lower than October. We believe the reason for this drastic reduction in call volumes is directly tied to the transition away from inquiries around higher customer bills that encapsulated the impacts of the heat wave in September that our Contact Center fielded in October as well as the Thanksgiving holiday break in November.

The chart below summarizes contact made by customers into our Contact Center broken down by month through December 4th:

Interactive Voice Response (IVR) and Service Level Agreement (SLA) Metrics

IVR and SLA Details	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22
Total Calls to IVR	79	109	103	324	531	349	307	244	243	1154	1538
Total Calls Connected to Agents	49	66	57	205	338	231	191	135	129	654	948
Average Seconds to Answer	0:00:38	0:00:14	0:00:21	0:00:37	0:00:22	0:00:14	0:00:13	0:00:13	0:00:08	0:00:09	0:00:06
Average Call Duration	0:08:57	0:07:51	0:06:42	0:10:33	0:08:13	0:08:41	0:08:11	0:08:30	0:08:28	0:08:53	0:09:45
Calls Answered within 60 Seconds (75% SLA)	91.84%	100.00%	89.83%	89.42%	96.46%	99.57%	98.95%	100.00%	100.00%	98.63%	99.26%
Abandon Rate	0.00%	0.00%	3.39%	1.44%	0.29%	0.00%	0.00%	0.00%	0.00%	0.46%	0.21%

IVR and SLA Details	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-MTD	Grand Total
Total Calls to IVR	3302	8326	3137	3836	7683	5856	4199	4281	3323	295	**49219**
Total Calls Connected to Agents	1817	4427	1841	2408	5099	3797	2594	2710	2235	198	**30129**
Average Seconds to Answer	0:00:03	0:00:04	0:00:03	0:00:04	0:00:45	0:00:27	0:00:10	0:00:13	0:00:11	0:00:02	
Average Call Duration	0:10:32	0:09:31	0:09:31	0:10:25	0:11:18	0:09:52	0:09:29	0:09:49	0:09:34	0:09:02	
Calls Answered within 60 Seconds (75% SLA)	100.00%	99.37%	99.84%	99.09%	79.70%	85.81%	95.35%	93.64%	95.31%	100.00%	
Abandon Rate	0.00%	0.00%	0.05%	0.04%	1.52%	1.12%	0.27%	0.44%	0.18%	0.00%	

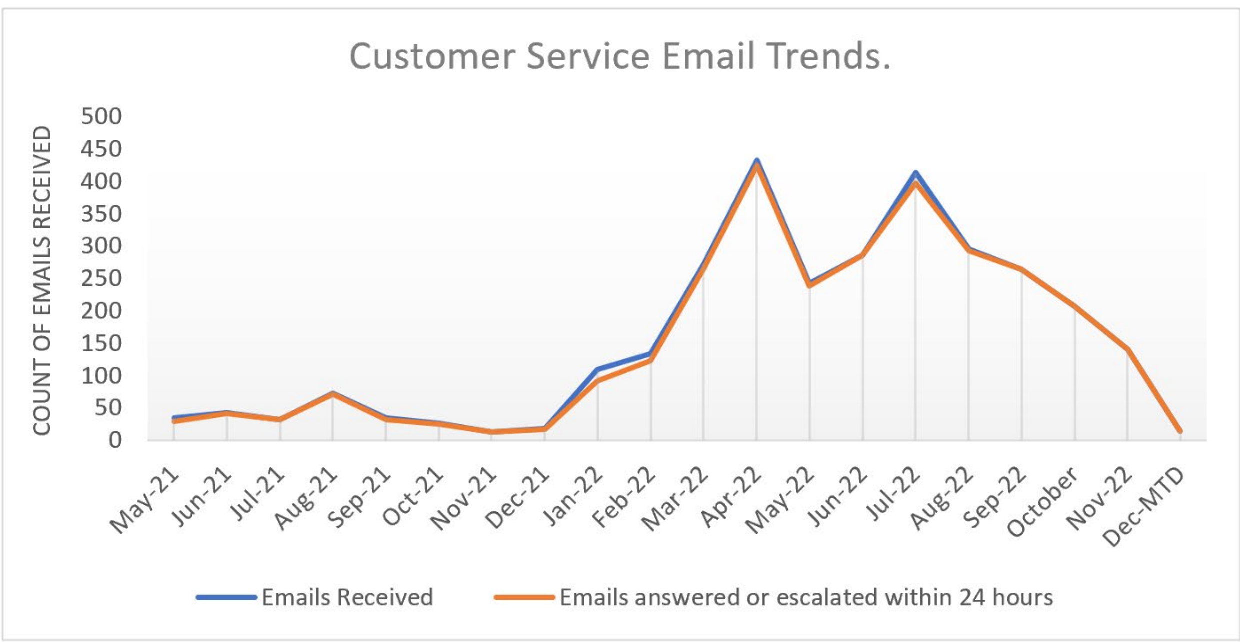


Similar to other mass enrollments in other CCAs' service territories, we are anticipating the trend of our customers calling into our Contact Center's Interactive Voice Response (IVR) system tree and being able to self-serve their opt actions using the recorded prompts as well as utilizing our website for processing opt actions to continue accounting for over 65% of all instances. The remaining portion of customer calls are connected to our Customer Service Representatives to answer additional questions, assist with account support, or submit opt actions.

Customer Service Emails			
Month	**Emails Received**	**Emails answered or escalated within 24 hours**	**(%)**
May-21	34	29	85.29%
Jun-21	43	41	95.35%
Jul-21	32	31	96.88%
Aug-21	73	71	97.26%
Sep-21	34	32	94.12%
Oct-21	26	25	96.15%
Nov-21	12	12	100.00%
Dec-21	18	16	88.89%
Jan-22	109	92	84.40%
Feb-22	133	123	92.48%
Mar-22	272	265	97.43%
Apr-22	432	424	98.15%
May-22	242	238	98.35%
Jun-22	286	285	99.65%
Jul-22	413	397	96.13%
Aug-22	295	293	99.32%
Sep-22	264	264	100.00%
October	207	207	100.00%
Nov-22	140	140	100.00%
Dec-MTD	14	14	100.00%

Customer Service Emails

**Does not include junk email*



As of this latest reporting month, we still have a total of 13 Dedicated Customer Service Representatives staffed at our Contact Center. Our robust Quality Assurance (QA) procedures are firmly in place to ensure that our customers are getting a world-class customer experience when they contact us.

COMMITTEE REVIEW

N/A

FISCAL IMPACT

N/A

ATTACHMENTS

N/A

SAN DIEGO COMMUNITY POWER
Staff Report – Item 4

To: San Diego Community Power Board of Directors

From: Jen Lebron, Director of Public Affairs

Via: Karin Burns, Chief Executive Officer

Subject: Marketing and Public Relations Update

Date: December 15, 2022

RECOMMENDATION
Receive and file update on Marketing and Public Relations activities for San Diego Community Power.

BACKGROUND
San Diego Community Power (SDCP) has engaged in a variety of public relations, marketing, and community outreach activities to drive awareness, spark engagement, and minimize opt-outs.

ANALYSIS AND DISCUSSION
SDCP has increased its focus on community engagement as it develops its Community Power Plan, which will be a roadmap for the selection, development, and investment of local programs based on community needs and gaps in program offerings.

Public Engagement Events

SDCP participated in the following outreach events:
November 4, 2022 – San Diego Business for Good Summit
November 5, 2022 – United Lowrider Coalition Car Show
November 6, 2022 – San Diego County Bicycle Coalition CicloSDias
November 14, 2022 – La Chula Crew, Imperial Beach Outreach/Food Distribution
November 18, 2022 – Las Palmas Outreach and Food Distribution, National City
December 4, 2022 – Chula Vista Starlight Nights

Media Outreach
NBC 7 San Diego and Telemundo 20 published an informational piece on holiday lights and how customers can save energy this season. We provided tips that were included in the list – from when your lights should come on, types of lights to look out for, and common ways people waste electricity during the holidays.

We also received a media request from New Project Media about our Local Renewable Energy and Energy Storage RFI for an upcoming featured article, to be published this month. New Project Media is a data and intelligence company that provides origination-led coverage of the renewable energy market for the development, finance, advisory and corporate community.

Communications and Outreach Strategy

SDCP is in regular communication with regional media in the spirit of transparency and openness.

It is developing its communications and outreach strategies for the onboarding of new board members this winter, rate adjustments in January, and the enrollment of National City and the unincorporated areas of San Diego County next spring.

COMMITTEE REVIEW

N/A

FISCAL IMPACT

N/A

ATTACHMENTS

N/A

SAN DIEGO COMMUNITY POWER

SAN DIEGO COMMUNITY POWER
Staff Report – Item 5

To: San Diego Community Power Board of Directors

From: Victoria Abrenica, Public Outreach Associate

Via: Karin Burns, Chief Executive Officer

Subject: Receive and File Community Advisory Committee (CAC) Monthly Report

Date: December 15, 2022

RECOMMENDATION
Receive and file CAC monthly report.

BACKGROUND
According to Section 5.10.3 of the SDCP Joint Powers Authority (JPA) Agreement:

> The Board shall establish a Community Advisory Committee comprised of non-Board members. The primary purpose of the Community Advisory Committee shall be to advise the Board of Directors and provide for a venue for ongoing citizen support and engagement in the strategic direction, goals, and programs of the Authority.

At the direction of the CEO, the CAC provides quarterly presentations to the Board of Directors in the regular agenda, and monthly reports in the consent agenda.

ANALYSIS AND DISCUSSION
The December 9, 2022, meeting of the CAC, was cancelled.

COMMITTEE REVIEW
N/A

FISCAL IMPACT
N/A

ATTACHMENTS
N/A

SAN DIEGO COMMUNITY POWER

SAN DIEGO COMMUNITY POWER
Staff Report – Item 6

To: San Diego Community Power Board of Directors

From: Colin Santulli, Director of Programs
Alyson Scurlock, Program Associate

Subject: Approve the Community Clean Energy Innovation Grants Policy

Date: December 15, 2022

RECOMMENDATION

Approve the Community Clean Energy Innovation Grants Policy.

BACKGROUND

The San Diego Community Power (SDCP) Board of Directors (Board) approved SDCP's FY22-23 budget on June 23, 2022, which included the creation of a community grant program as a component of the Programs Department budget. SDCP staff are now seeking approval of the Community Clean Energy Innovation Grant Policy to delegate authority to the Chief Executive Officer to design and implement the program.

DISCUSSION

Overview

SDCP's Community Clean Energy Innovation Grants Program (Program) would aim to support scalable, replicable clean energy pilot projects that provide economic, environment, and health benefits to SDCP's communities and increase overall energy literacy of SDCP customers. Program funded activities are expected to advance one or more of the following program focus areas:

- Energy behaviors and/or education that reduce energy consumption and/or costs
- Improvements in indoor and/or outdoor air quality related to greenhouse gas emissions
- Workforce development opportunities that support careers in the clean energy industry
- Energy resilience to ensure communities can avoid, prepare for, minimize, adapt to, and recover from energy disruptions
- Increased access to the benefits of clean energy technologies with a focus on underserved communities and vulnerable populations

Other community choice aggregators (CCAs) have successfully implemented similar initiatives (e.g., East Bay Community Energy's [Community Innovation Grants] and Peninsula Clean Energy's [Community Pilot Program]).

Program Structure and Process

Community-based non-profits serving SDCP's member agencies will be eligible to apply for a maximum amount of grant funding, expected to be no more than $45,000 per grantee for the FY22-23 program. Grant applications will be reviewed by an evaluation committee and selected based on alignment with grant criteria and eligibility.

Additional details pertaining to structure and process of the program (e.g., evaluation criteria mechanisms, allowable grant expenses, required grantee reporting) will be outlined in a final program guidelines document. Staff will inform the Board upon finalization of the program guidelines.

Next Steps

SDCP staff anticipate launching the Program in Q1 CY2023. Staff may seek support for administration of the program and distribution of grant funds through a qualified consultant. Staff estimate bringing an update back to the Board and seeking approval to transfer funds to the selected administration partner at the February 2023 Board meeting.

COMMITTEE REVIEW

Due to the cancellation of the December 2022 Community Advisory Committee (CAC) meeting, SDCP staff were not able to provide this update to the CAC but will bring it back to them at their next meeting.

FISCAL IMPACT

Funding for a community grant program was approved in the FY22-23 budget as part of the Programs Department budget. Staff expects no more than $300,000 to be allocated to the Program in FY22-23 and will seek approval of grant distributions per the SDCP Procurement Policy.

ATTACHMENTS

Attachment A: Community Clean Energy Innovation Grants Policy

Policy Title	Community Clean Energy Innovation Grants Policy	
	Effective Date	Original: 12/15/2022

Community Clean Energy Innovation Grants Policy

A. PURPOSE

The purpose of this Community Clean Energy Innovation Grants Policy (Policy) is to provide authority to the San Diego Community Power (SDCP) Chief Executive Officer (CEO), or designee, to design and approve the Community Clean Energy Innovation Grants Program (Program) guidelines, implement the Program, develop required contracts and grantmaking, and make minor modifications to the guidelines, where necessary.

B. GRANT PROGRAM GOALS

The Program aims to support scalable, replicable clean energy pilot projects that provide economic, environmental, and health benefits to SDCP's communities and increase overall energy literacy of SDCP customers. Program funded activities are expected to advance one or more of the following program focus areas:

- Energy behaviors that reduce energy consumption and/or costs
- Improvements in indoor and/or outdoor air quality
- Workforce development opportunities that support careers in the clean energy industry
- Energy resilience to ensure communities can avoid, prepare for, minimize, adapt to, and recover from energy disruptions
- Increased access to the benefits of clean energy technologies with a focus on underserved communities and vulnerable populations

C. GRANT PROGRAM STRUCTURE & PROCESS

The following sections outline overall Program structure and process. SDCP staff will inform the SDCP Board of Directors (Board) upon finalization of the detailed structure and process in a final Program guidelines document.

Eligibility

Applicants must be a nonprofit with 501(c)(3) public charity status serving SDCP customers. A 501(c)(3) public charity may serve as a fiscal sponsor for another applicant to administer the grant and provide required grant reporting.

Evaluation Committee

The Chief Executive Officer, or designee, will establish a committee to review and score grant applications based on the evaluation criteria outlined below, which committee may include SDCP staff and a representative from SDCP's Community Advisory Committee. Staff from a program administrator should one be hired to support SDCP staff in the administration of the Program.

Evaluation Criteria

The application evaluation criteria will be structured based on the categories outlined below. Application of the criteria will be articulated in the final Program guidelines. In the circumstance where applications have an equal evaluation score, the evaluation committee will prioritize selection of projects across a diversity of the program focus areas.

Criteria	Description
Feasibility	Application includes staffing capability, timing, and applicable skills to implement project. Budget is less than or equal to maximum allowable amount and is reasonable for project scope.
Community Benefits	Project addresses economic, environment, and/or health benefits in SDCP's communities by focusing on one of the following project focus areas: • Energy behaviors that reduce energy consumption and/or costs • Improvements in indoor and/or outdoor air quality • Workforce development opportunities that support careers in the clean energy industry • Energy resilience to ensure communities can avoid, prepare for, minimize, adapt to, and recover from energy disruptions • Increased access to the benefits of clean energy technologies with a focus on underserved communities and vulnerable populations
Scalability and Replicability	Project can be replicated and/or expanded to other communities in SDCP's service territory.
Communities of Concern	Project focuses on underserved, vulnerable populations in SDCP's service territory (i.e., communities of concern).
Innovation	Project proposes an untested, innovative approach to provide community benefits outlined above.

Grantee Reporting

Grantees will provide final reports to SDCP summarizing project outcomes and other project metrics as defined in an executed grant agreement with SDCP or the program administrator.

Timeline

Grant funds will be expended by grantees no later than 12 months from award date.

Grantee Compliance

Grantees will be required to comply with all applicable federal, state, and local laws, rules, and regulations, which may include provisions of the California Labor Code relating to the payment of prevailing wages and the performance of other requirements on certain public works and maintenance projects.

D. GRANT FUNDING

This Policy does not explicitly authorize procurement by SDCP as the related Program does not purchase a good or service, with the exception of a potential program administrator to support the distribution of grant funds. All Program-related expenditures will comply with the SDCP Board-approved procurement policy.

Individual grant amounts shall not exceed 15% of total annual approved Program budget. Staff will inform the Board of any grant disbursements related to the Program.

E. TERRITORY

SDCP's service area.

F. AUTHORITY DELEGATION

This Policy authorizes the CEO, or designee, to design and approve the Program guidelines, implement the Program, develop required contracts and grantmaking, and make minor modifications to the guidelines, where necessary.

SAN DIEGO COMMUNITY POWER
Staff Report – Item 7

To: San Diego Community Power Board of Directors

From: Colin Santulli, Director of Programs
Nelson Lomeli, Program Manager
Alyson Scurlock, Program Associate

Subject: Community Power Plan Update – Community Needs Survey

Date: December 15, 2022

RECOMMENDATION

Receive and file an update on the Community Power Plan (CPP) community needs survey.

BACKGROUND

The CPP was created to provide a strategic plan for the organization's customer energy programs. It will allow SDCP to successfully deliver programs that, per the Joint Powers Authority, are centered on economic, environmental, and social equity. The CPP will strive to ensure that our programs best serve the needs of our customers, member agencies, and local communities, and support regional sustainability efforts.

At the September 22, 2022 Board of Directors (Board) meeting, SDCP staff presented an update on the development of the CPP. The update included details about the methods and initial findings of the community needs assessment that SDCP staff had undertaken to provide insight on the values, needs, and priorities of SDCP's customers and stakeholders. An overview of the methods is outlined below, with full details and key findings of the initial community needs assessment efforts included in the September 22, 2022 Board meeting staff report for Agenda Item 11.

Between May and September 2022, the following external community engagement was conducted for the community needs assessment, with a focus on Communities of Concern throughout SDCP's service territory:

- Initial interviews with local community groups and other public agencies to learn best practices from entities with extensive and longstanding community engagement experience in SDCP's service territory (including National City and unincorporated San Diego County);
- Six (6) listening sessions co-hosted by community-based organizations throughout SDCP's service territory (i.e., Art Produce, Casa Familiar, Chicano Federation, MAAC, and Project New Village) that engaged nearly 200 community members;

- Six (6) pop-up events in unincorporated San Diego County that gathered information from over 100 unincorporated San Diego County residents;
- Interviews with interest-group stakeholders that have a close relationship with community members and understand the needs, priorities, and challenges of the community or represented populations that SDCP wanted to ensure were engaged in the CPP process (Chula Vista Community Collaborative, Encinitas Community Resources Center, International Brotherhood of Electrical Workers Local 569, Logan Heights Community Development Corporation, San Diego Housing Federation, and San Diego & Imperial Counties Labor Council); and
- Five (5) virtual workshops to hear from a broad spectrum of customers including local businesses, key customers, and the general public.

Additionally, the CPP project team engaged internal SDCP stakeholders including Board members, SDCP staff, and SDCP's Community Advisory Committee (CAC) about priorities and needs around energy-related issues across the represented communities and from within the organization. The objective of the internal engagement was to hear about organizational goals and priorities as they relate to potential future programs from those who work most closely with SDCP. Between August and September 2022, the following internal organizational engagement was conducted for the community needs assessment:

- Interviews with five (5) of SDCP's seven (7) Board members. The remaining two (2) Board members were unable to be interviewed or declined to be interviewed;
- One (1) 2-hour workshop with SDCP Staff (CEO, CFO, Managing Director of Power Services, and Directors and/or Managers from all departments) to understand input and knowledge regarding overarching SDCP business strategies and how programs fit into the larger context of delivering SDCP's operations and future investments; and
- One (1) 1-hour workshop with SDCP's CAC during their regularly scheduled meeting where all 13 members were able to provide input verbally and through a live survey format.

This staff report focuses on the remaining element of the community needs assessment – the community needs survey – and next steps for developing the CPP.

DISCUSSION

Community Needs Survey Overview

The initial engagement described in the background section largely informed the development of a community needs survey that SDCP staff launched to further understand the diverse needs and priorities of SDCP's communities. The web-based community needs survey was open for seven (7) weeks between August and October 2022 and was available in English, Spanish, and Filipino. The survey included nineteen (19) questions that related to survey respondent demographics; needs, challenges, and opportunities in communities; and program needs and participation. The full residential survey instrument is found in Attachment A. The business survey instrument was nearly identical with a different set of demographic questions and slight adjustments to questions to make answers more relevant to a business owner/operator.

Survey Promotion

The CPP project team sought to gather survey responses that were as reflective of SDCP's customer base as possible. While the survey was open, the CPP project team analyzed incoming demographic data from responses on a weekly basis to assess how reflective the responses were across several variables such as member jurisdiction, housing type (i.e., single-family, multi-family, manufactured home), housing tenure (i.e., owner-occupied, renter-occupied), and annual household income. The different variables were compared against American Community Survey (ACS) 5-year 2020 census data tables. This real-time analysis informed adjustments to the survey promotional plan to boost response rates in areas that were underrepresented.

SDCP staff employed various techniques to promote the community needs survey:

- Included language, a survey link, and QR code to the survey on SDCP's annual Power Content Label that was mailed out to over 600,000 customer accounts.
- Added language to the bottom of SDCP's portion of customer's electric bills with a link to the survey.
- Added a banner to SDCP's main website page with a link to the survey that generated 8,802 impressions.
- Provided the opportunity for survey respondents to enter to win one (1) of ten (10) $50 gift cards.
- Posted organically on all SDCP's social media networks regularly (Facebook, Instagram, Twitter, LinkedIn) and in multiple languages (English, Spanish, and Filipino).
- Targeted social media advertisements to residents in hard-to-reach communities (separate from organic social media posts), including residents in Chula Vista, National City, and unincorporated San Diego County, renters, and Spanish and Filipino-speaking residents.
- Published paid print advertisements in Spanish and Filipino-speaking publications.
- Coordinated outreach with member agency staff and elected officials to promote the survey via email blasts, newsletter blurbs, resharing organic social media posts, and other distribution channels.
- Emailed a CPP media kit to an extensive list of community-based organizations that included sample language for an email blast, a newsletter copy, social media graphics that could be posted, and links to reshare SDCP's social media posts.
- Partnered with the San Diego Padres to send out an email blast to more than 160,000 subscribers.

- Contacted and encouraged business associations (e.g., San Diego Regional Chamber of Commerce) to share the survey link with their members.

In addition to digital promotion of the survey, the CPP project team sought to meet the community where they were by collecting survey responses in-person and promoting the survey at events. SDCP staff had tablets and paper versions of the survey available for community members to fill out the survey. At several tabling events, community members that took the survey on the spot were compensated with a $10 gift card for their time and input. In-person collection efforts included:

- Tabled at over 15 community and pop-up events throughout SDCP's service territory (at least one event in each member jurisdiction), including at swap meets, parks, food distribution sites, and library branches.
- Designed and printed a postcard-size flyer in English, Spanish, and Filipino with a link and QR code to the survey. The flyer was distributed at community events and shared with community groups for distribution to their community members.
- Worked with a community organization in National City to gather survey responses from attendees of their classes and tours.

Survey Responses

Out of the total responses received to the community needs survey, **2,980 responses** were complete, validated responses from within SDCP's service territory. Of those, **2,849 responses** were received from residential respondents and **131 responses** were received from commercial respondents. The additional responses included incomplete responses, responses from residents in Clean Energy Alliance's service territory, and responses from outside of San Diego County, therefore they were removed for the purpose of the CPP analysis.

The following sections provide a high-level overview of several survey results. SDCP staff intend to make available the full survey dataset once the data is formatted to be easily accessible.

Community Needs Survey Demographics

The first part of the survey included demographics questions for residential respondents to provide insight into who completed the survey in comparison to SDCP's customer base. Residential respondents were asked to enter their home zip code, housing type, housing tenure, age, race and/or ethnicity, and annual household income. Most questions included a "prefer not to answer" option. This data was compared to ACS 5-year 2020 census data for comparison.

Survey responses were generally reflective of the population in SDCP's service territory across a variety of variables. The below sections include analysis of the 2,849 residential survey responses by member jurisdiction, housing type, housing tenure, and annual household income.

Member Jurisdiction

Figure 1 shows the breakdown of survey responses by SDCP's member jurisdictions compared to the number of households in each member jurisdiction. Survey responses were generally reflective or overrepresented across four member agencies (cities of Encinitas, Imperial Beach, La Mesa, and San Diego), with the City of San Diego receiving the largest number of responses. Survey responses were underrepresented in the cities of Chula Vista and National City, and in unincorporated San Diego County. Residents of National City and unincorporated San Diego County do not begin service with SDCP until early 2023, and thus did not receive the Power Content Label mailer that included a link and QR code to the survey. Additional promotional efforts were made in National City and unincorporated San Diego County to increase participation.

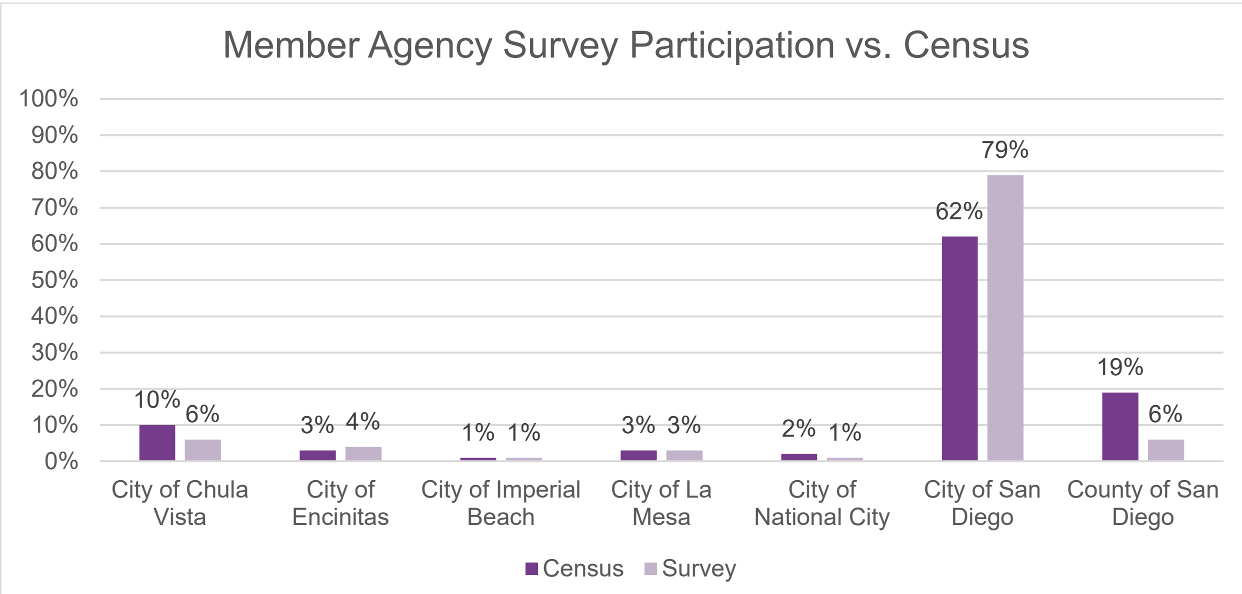


Figure 1: Survey responses by member jurisdiction compared to census data

Housing Type and Tenure

The figures on the next page show the breakdown of survey responses by housing type and tenure. We received 11% more responses from people who live in single-family homes compared to multi-family homes (Figure 2) and 26% more responses from owner-occupied units compared to renter-occupied units (Figure 3). A total of 1% of survey respondents chose "other" for housing type and 2% of survey respondents chose "prefer not to answer" for housing tenure.

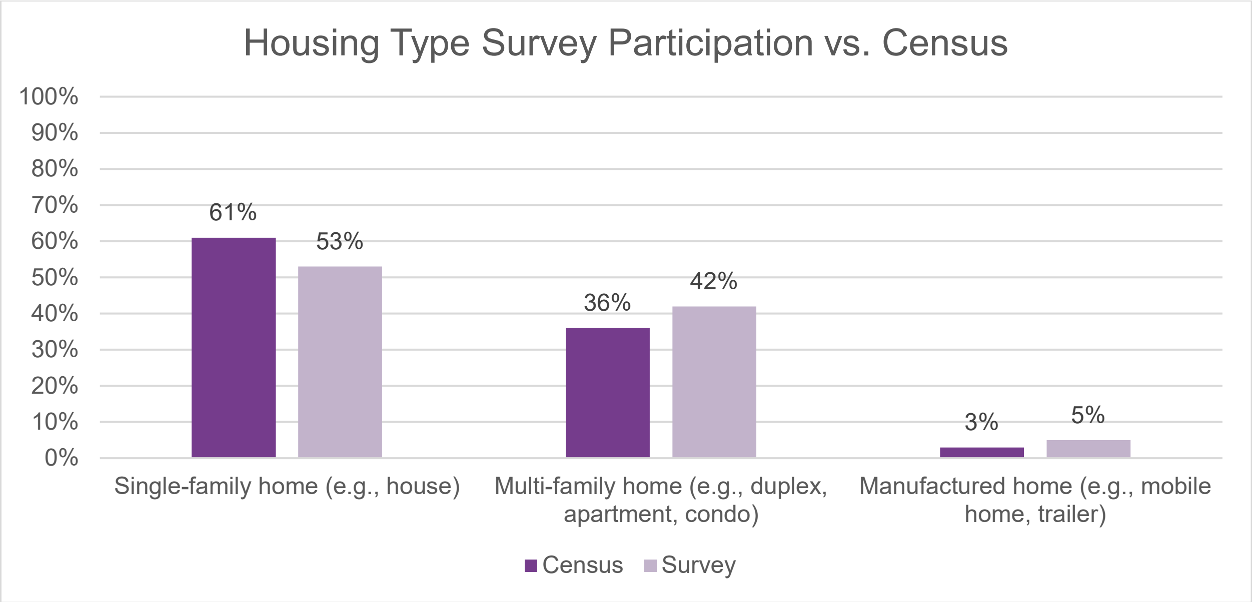


Figure 2: Survey responses by housing type compared to census data

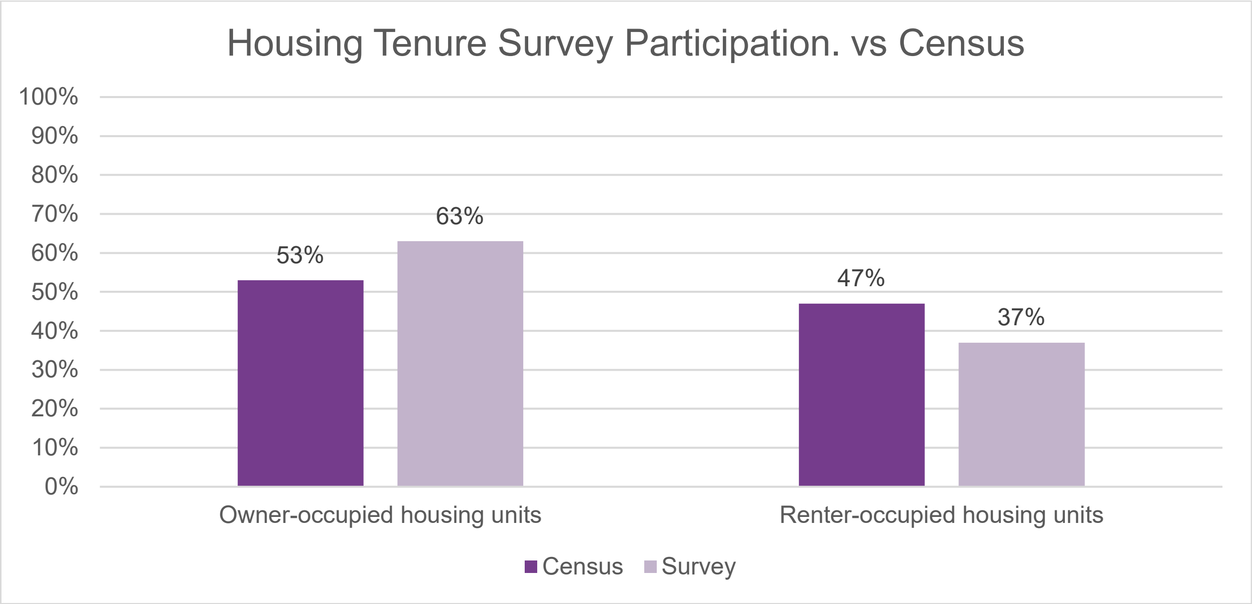


Figure 3: Survey responses by housing tenure compared to census data

Income

Figure 4 shows the breakdown of survey responses by annual household income. Responses were generally reflective across most of the income categories. A significant number of survey respondents (12%) selected “prefer not to answer” for this question.

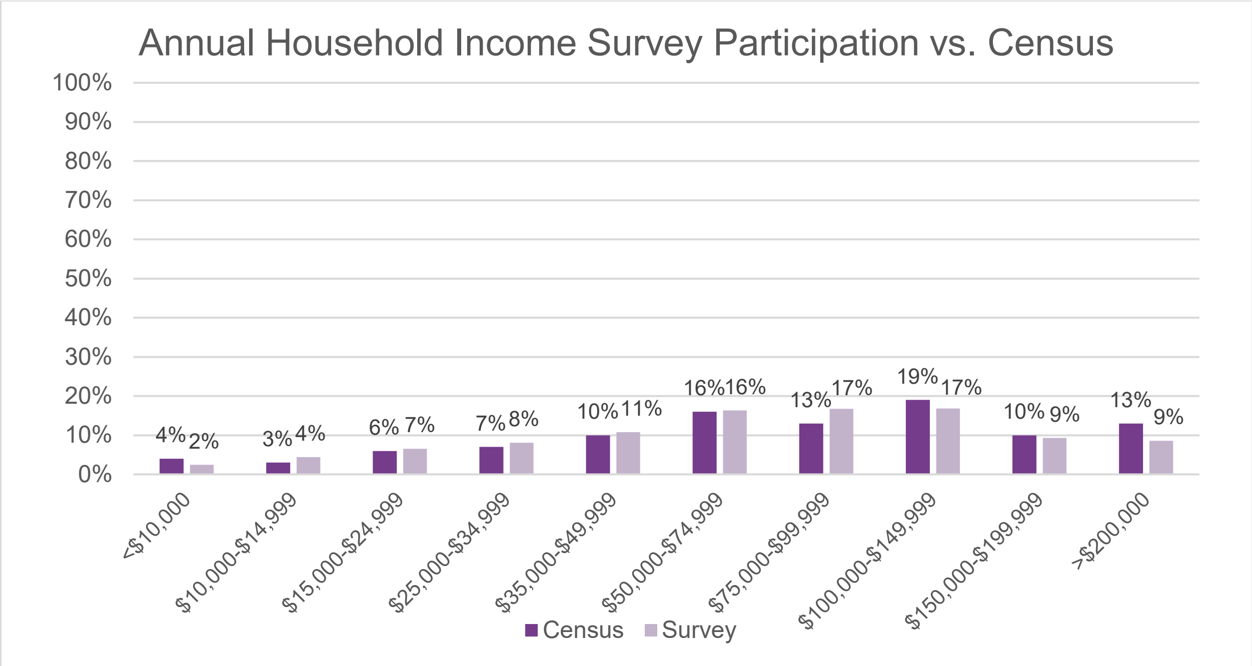


Figure 4: Survey responses by annual household income compared to census data

Community Needs Survey Findings

The core questions of the survey sought to understand the needs, challenges, and opportunities faced by residents and businesses within SDCP's service territory, programs that respondents are aware of and/or are participating in, and how respondents receive information about local programs. The below sections include key takeaways for the 2,849 residential customer and 131 commercial customer survey responses.

Major Challenges or Issues Faced

Respondents were first asked about major challenges or issues they are facing in their communities, with the option to select multiple answers. While SDCP may not be able to provide programs that directly address these challenges, this question was included to help SDCP staff better understand general challenges in relation to energy. Programs cannot be designed and launched in a silo without understanding the general challenges our customers face.

Residential

From this question, we learned that the top five (5) challenges residential customers face out of the nine (9) challenges that were listed are:

1. Finding housing that is affordable;
2. Paying for essentials like food and gas;
3. Too much traffic;
4. Not enough trees, shade, or natural areas and open spaces; and
5. Air pollution.

Commercial

In addition, we learned that the top five (5) challenges commercial customers face out of the twelve (12) challenges that were listed are:

1. Employee recruitment and retention;
2. Cost of new construction and development;
3. Increased cost of goods and services;
4. Reliability of infrastructure; and
5. Air pollution.

Energy Issues

Switching to the energy issues our communities face that SDCP may be able to help address, respondents were next asked to rank various issues in order of importance. The answer options for this question were informed by the key themes that emerged from the initial community engagement SDCP staff completed.

Residential

Matching the feedback received during the initial community engagement phase, residential respondents identified **reducing energy bills and addressing climate change as their first and second leading issue**, respectively. These top two energy issues remain consistent when broken down by housing type and tenure and respondents from most income groups (i.e., $50,000-149,000). Respondents with annual household incomes less than $50,000 ranked creating good, well-paying jobs in the energy sector and getting rewarded to manage energy use higher than addressing climate change, while respondents with annual household incomes more than $150,000 ranked addressing climate change as their top energy issue.

Commercial

Creating good, well-paying jobs in the energy sector, reducing businesses' energy costs, and getting compensated for load management were the highest ranked energy issues for commercial respondents. Top issues were the same regardless of the size of business respondent.

Energy Solutions

Employing the equitable community engagement belief that the solutions to community issues lie within communities themselves, we next asked respondents to rank the types of solutions to energy issues they wanted to see in their communities from most important to least important.

Residential

The top four energy solutions residential respondents most want to see in their community are 1) building more large-scale renewable energy generating systems in the San Diego region, 2) improved indoor air quality through building electrification, 3) improved outdoor air quality through transportation electrification, and 4) installing renewable energy generating systems on rooftops or parking lots.

These top energy solutions remain consistent across housing type, housing tenure, and all income groups, though the order for each varied slightly. Single-family, homeowners, and respondents with annual household incomes above $150,000 ranked building more renewable generating systems higher, while multi-family, renters, and respondents with annual household incomes less than $150,000 ranked improving indoor and outdoor air quality higher.

Commercial

Overwhelmingly, commercial respondents ranked improving indoor air quality through **building electrification** the highest. Building more large-scale renewable energy generating systems in the San Diego region, improving outdoor air quality through transportation electrification, and installing more renewable generating systems on rooftops or parking lots followed. When broken down by business size, businesses with less than 500 employees ranked improving outdoor air quality higher than building more large-scale renewable energy generating systems.

Program Awareness

Respondents were asked about the existence of a variety of programs to better understand customers' general awareness of available programs. Survey respondents had the option to select all the programs they were aware of from a list of eight (8) general program topic areas.

Residential

Regardless of housing type or tenure, residential respondents were most aware of energy efficiency incentives and demand response programs that incentivize and/or support shifting energy use to less expensive off-peak hours. Electric vehicle and solar panel incentives were also highly ranked in awareness by all residential respondents. When considering highest level of program awareness for different housing types and tenures, single-family respondents are most aware of solar incentives, multi-family and homeowner respondents are most aware of demand response incentives, and renters are most aware of energy efficiency incentives.

Despite programs being available in all program categories, **nearly 20% of survey respondents were not aware of any local programs available to them** with renters being disproportionally unaware. Of the 511 respondents that provided their housing tenure and indicated they were not aware of any local programs, renters were overrepresented relative to the survey population (Figure 5). There was not a significant difference between housing types and annual household income groups for those respondents who were unaware of the existing local programs.

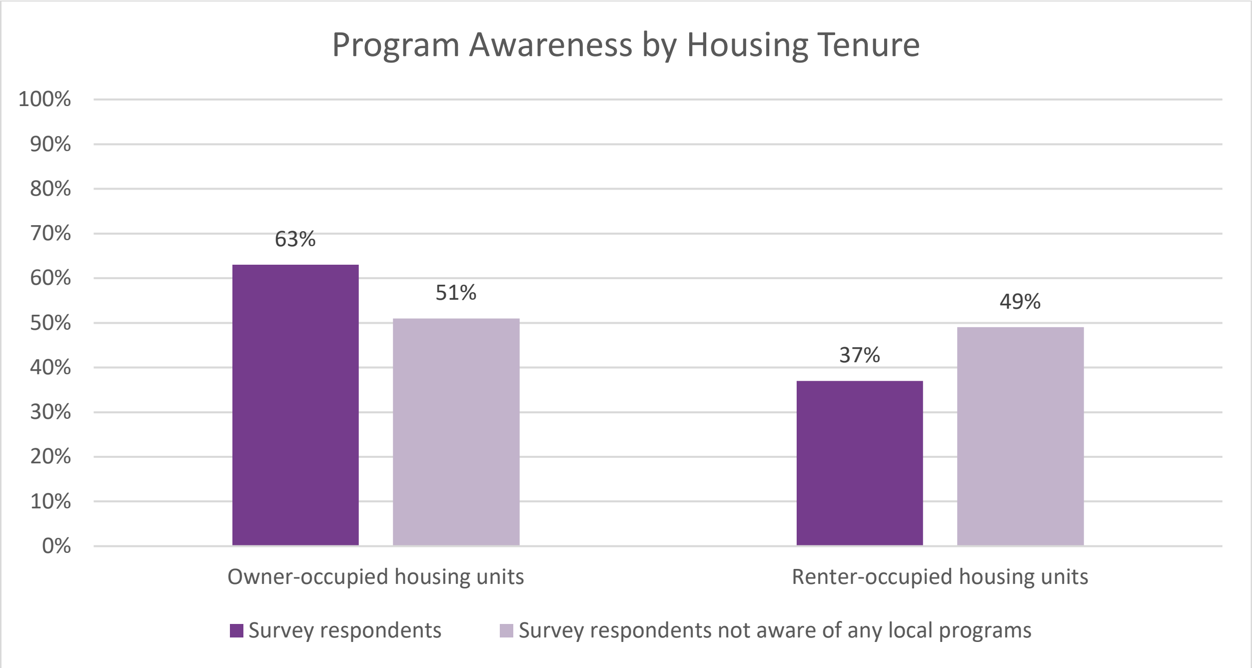


Figure 5: Survey respondents not aware of any local programs by housing tenure

Commercial

Commercial respondents are aware of many of the local program types that may be available to them; the "I am not aware of any local programs" answer option was only selected once. Across program topic areas, demand response, electric vehicle charging equipment, and building electrification incentives received the greatest number of responses for program awareness. Businesses with fewer than 100 employees selected demand response incentives and green rates as the program types they are most aware of, while businesses with greater than 100 employees selected energy efficiency and electric vehicle charging equipment incentives as the program types they are most aware of.

Program Participation (Type)

Respondents revealed program participation by selecting all the programs they had participated in from a list of eight (8) general program topic areas.

Residential

Energy efficiency and demand response incentive programs were the most accessed across all housing type and tenure responses which aligns with residential customers being most aware of those types of programs. After the top two programs respondents were most likely to participate in, there was a split based on housing type and tenure. Following demand response and energy efficiency incentives, **single-family and homeowner respondents are more likely to participate in solar incentives**, whereas multi-family and renter respondents are more likely to participate in building electrification incentives.

Over 33% of all residential respondents had not participated in any type of program. Responses by housing type and tenure are proportional to survey population.

Commercial

Commercial respondents indicated that they have participated in several program types, with less than 2% of the answer options selected correlating with respondents not participating in any program type. This aligns with commercial respondents being more aware of local programs compared to residential respondents. For program participation, demand response, building electrification, green rates, and energy efficiency incentives were the most common overall and for businesses with less than 100 employees.

Program Participation (Barriers)

Barriers to program participation remain a central component to inform smart program design. Respondents provided reasons they were not participating in energy programs by selecting all the reasons they did not participate from a list of six (6) options or by providing their own reason.

Residential

Awareness of local programs is a significant barrier to program participation, regardless of housing type, housing tenure, or income level. Beyond awareness, cost of clean energy technologies, even when considering incentives, as well as not having enough time to research program details are the leading issues reported as impacting program participation, with over one-third of respondents selecting one of these barriers (Figure 6).

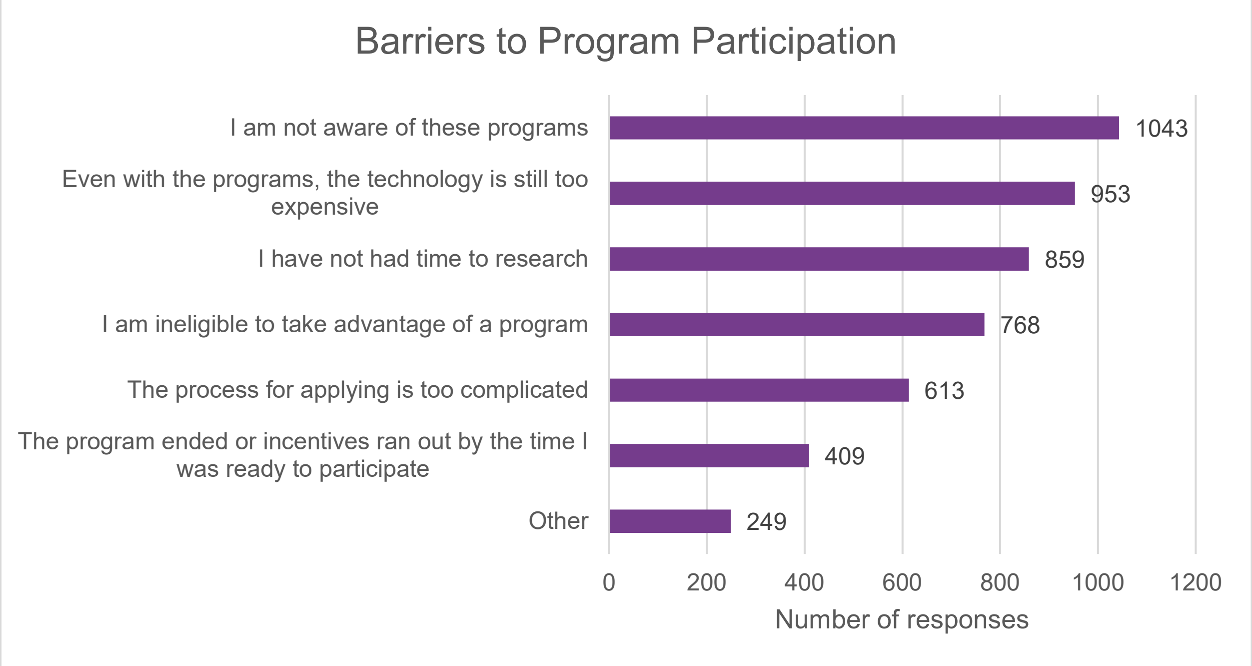


Figure 6: Barriers to program participation for residential survey respondents

Multi-family and renter respondents indicated that not being eligible to participate is a higher barrier compared to single-family and homeowner respondents. Many multi-family programs are targeted at building managers/owners which may impact the perception of eligibility by respondents.

Commercial

Commercial respondents reported higher awareness of programs and, accordingly, ranked other reasons higher for non-participation. These reasons include the technology still being too expensive even with the program, the process for applying being too complicated, not being eligible to participate, not enough time to research, and the program ending by the time they were ready to participate.

For businesses with fewer than 100 employees, the technology still being too expensive even with the program was the top reason for not participating.

Program Information

The final survey question sought to identify where respondents get information about local programs.

Residential

The top sources that residential respondents receive information about local programs from are websites, word of mouth, social media, emails, and utility bill inserts. On the other hand, communicating about programs via elected officials' newsletters and sending notifications through their city or county were indicated to be the least effective communication methods about programs.

Commercial

The top sources that commercial respondents receive information about local programs from are emails, word of mouth, websites, utility bill inserts, and advertisements. Commercial respondents also selected their elected officials' newsletters and notifications through their city or county as the least effective communication methods about programs.

Next Steps

The CPP project team is currently developing a program prioritization framework to inform program types for the draft CPP. The prioritization framework uses data gathered from the community needs assessment to analyze a list of potential program types generated from the program market assessment. The prioritization framework evaluates the potential program types across external community and internal agency priorities to estimate how impactful a program could be at addressing those priorities.

The most impactful program types will form the basis for the initial portfolio of program types that SDCP should consider over the next five (5) years. The CPP will categorize these program types on short-, medium-, and long-term horizons, and consider funding opportunities and other implementation elements (e.g., third-party administration, etc.).

SDCP staff anticipate presenting a draft list of program types developed by the prioritization framework for input to the Board and CAC in Q1 2023.

After incorporating CAC and Board feedback on the draft list of programs, the CPP project team anticipate releasing a public draft of the CPP for a 30-day public review and comment period in Q1 2023. The public draft will be made available in English, Spanish, and Filipino. During this time, the CPP project team will re-engage with the community, stakeholders, and the CAC to solicit feedback on the draft plan. After incorporating input from the comment period, SDCP staff anticipate presenting a final CPP for Board adoption in Q2 2023.

COMMITTEE REVIEW

In the June 2022 CAC meeting, the CAC selected two committee members to participate in the CPP project team (i.e., participation in standing and impromptu working meetings with SDCP staff and consultants). The CAC has a standing agenda item to receive ongoing CPP updates from the CPP project team.

FISCAL IMPACT

None. Funding for the development of the CPP comes from Calpine as part of their Data Management Agreement. Any fiscal impacts from SDCP for promotional activities are factored into the FY22-23 budget.

ATTACHMENTS

Attachment A: Community Needs Survey Instrument

Community Needs Survey

This survey will take 5-10 minutes to complete and is an important part in the development of our Community Power Plan. All the information submitted is strictly confidential and anonymous and will only be used to confirm that we have received a representative sample from our communities. SDCP will not sell this information or use it for any marketing purposes.

Do you know if you are currently a San Diego Community Power (SDCP) customer?

- ☐ Yes, I am a SCDP customer
- ☐ No, I am not a SDCP customer
- ☐ I'm not sure

What is your home ZIP code?

Are you a business or residential customer?

- ☐ Residential *(I receive an energy bill for my home)*
- ☐ Business *(I receive an energy bill for my work)*

What best describes your housing?

- ☐ Single family home *(e.g., house)*
- ☐ Multi family home *(e.g., duplex, apartment, condo)*
- ☐ Manufactured home *(e.g., mobile home, trailer)*
- ☐ Other (please specify):

Do you rent or own your home?

- ☐ Rent
- ☐ Own
- ☐ Prefer not to answer

What is your age?

- ☐ Under 18 years
- ☐ 18-34 years
- ☐ 35-44 years
- ☐ 45-54 years
- ☐ 55-64 years
- ☐ 65+ years
- ☐ I prefer not to answer

What is your race or ethnicity? *Select all that apply.*

- ☐ American Indian or Alaskan Native
- ☐ Asian or Asian Indian
- ☐ Black or African American
- ☐ Hispanic/Latinx
- ☐ Middle Eastern or North African
- ☐ Native Hawaiian or Other Pacific Islander
- ☐ White
- ☐ I prefer not to answer
- ☐ Other (please specify):

What is your annual household income?

- ☐ <$10,000
- ☐ $10,000 - $14,999
- ☐ $15,000 - $24,999
- ☐ $25,000 - $34,999
- ☐ $35,000 - $49,999
- ☐ $50,000 - $74,999
- ☐ $75,000 - $99,999
- ☐ $100,000 - $149,999
- ☐ $150,000 - $199,999
- ☐ >$200,000
- ☐ I prefer not to answer

Understanding Community Needs, Challenges, and Opportunities

We want to understand about the needs, challenges, and opportunities you and your community are facing.

What are the major challenges or issues you are facing in your community? *Select all that apply.*

- ☐ Paying for essentials like food and gas
- ☐ Finding housing that is affordable
- ☐ Wildfires
- ☐ Air pollution
- ☐ Health problems and diseases
- ☐ Too much traffic
- ☐ New construction and development
- ☐ Not enough trees, shade or natural areas and open spaces
- ☐ Other (please specify):

Have you made any of the following energy improvements to your home? *Select all that apply.*

- ☐ Installed electric vehicle charging stations
- ☐ Purchased more efficient appliances (e.g., air conditioner, water heater, refrigerator, etc.)
- ☐ Switched from natural gas to electric appliances/equipment (e.g., electric heat pumps or water heaters, electric stoves, etc.)
- ☐ Installed solar panels
- ☐ Installed battery storage
- ☐ Improved insulation, windows or other weatherization

SAN DIEGO COMMUNITY POWER

- ☐ Installed LED lights or other efficient lighting
- ☐ Installed a smart thermostat
- ☐ Completed an energy audit
- ☐ I have not made any energy improvements
- ☐ Other (please specify):

What energy issues are most important to you?
Number from most important [#1] to least important [#9].

____ Creating good, well-paying jobs in the energy sector
____ Reducing my energy bill
____ Getting rewarded to adjust when I use energy
____ Addressing climate change by reducing greenhouse gas emissions
____ Breathing cleaner air in my home *(e.g., by replacing air polluting appliances)*
____ Reducing air pollution in my community
____ Creating opportunities to participate in the clean energy transition for low-income households or Communities of Concern *(i.e., historically underserved, underinvested and excluded communities)*
____ Building more local energy generating systems (like solar panels) on rooftops instead of large systems in remote areas
____ Keeping the power on at my home or business *(e.g., preventing power outages)*

What types of solutions to energy issues do you most want to see in your community?
Number from most important [#1] to least important [#11].

____ Improving indoor air quality by making buildings all-electric
____ Improving outdoor air quality by increasing the number of electric cars, trucks and buses
____ Building more large-scale renewable energy generating systems in the San Diego region
____ Installing renewable energy generating systems on rooftops or parking lots
____ More efficient buildings that use less energy to reduce energy bills
____ More comfortable buildings *(e.g., improvements to keep buildings cool or warm)*
____ Access to and training for well-paying jobs in the clean energy sector
____ Helping low-income families pay or reduce their energy bills
____ Access to technical experts to give you advice on energy saving projects
____ Backup power during outages
____ Better awareness & control of when to use energy to save cost and reduce emissions

Understanding Your Program Needs

We want to understand what programs, if any, you have participated in or are currently participating in.

Are you aware of any of the following types of local programs that may be available to you? *Select all that apply.*

- ☐ Solar incentives to install solar panels on buildings
- ☐ Energy efficiency incentives like savings on lighting, appliances, and equipment
- ☐ Electric heat pump or water heater incentives to replace natural gas equipment with all electric
- ☐ Electric vehicle incentives & rebates
- ☐ Energy demand management, smart thermostat or time of use incentives to provide lower energy rates for energy used during off-peak hours

Have you participated in any of the program types available to you? *Select all that apply.*

- ☐ Solar incentives to install solar panels on buildings
- ☐ Energy efficiency incentives like savings on lighting, appliances, and equipment
- ☐ Electric heat pump or water heater incentives to replace natural gas equipment with all electric
- ☐ Electric vehicle incentives & rebates
- ☐ Energy demand management, smart thermostat or time of use incentives to provide lower energy rates for energy used during off-peak hours
- ☐ Green rates or programs that allow customers who are unable to install solar panels to benefit from large scale clean energy via discounts

- ☐ Green rates or programs that allow customers who are unable to install solar panels to benefit from large scale clean energy via discounts
- ☐ Weatherization programs to provide direct installation of energy saving measures such as installation or efficient equipment in order to reduce bills
- ☐ Technical assistance to enable customers to take advantage of energy incentives or energy efficiency measures
- ☐ I am not aware of any local programs
- ☐ Other (please specify):

- ☐ Weatherization programs to provide direct installation of energy saving measures such as installation or efficient equipment in order to reduce bills
- ☐ Technical assistance to enable customers to take advantage of energy incentives or energy efficiency measures
- ☐ I have not participated in any type of program
- ☐ Other (please specify):

Why would you not participate in any energy programs? *Select all that apply.*

- ☐ I am not aware of these programs
- ☐ The process for applying is too complicated
- ☐ Even with the programs, the technology is still too expensive
- ☐ I have not had time to research
- ☐ I'm ineligible to take advantage of a program
- ☐ The program ended or incentives ran out by the time I was ready to participate
- ☐ Other (please specify):

Where do you get information about local programs?
Select all that apply.

- ☐ Website
- ☐ Social media
- ☐ Word of mouth
- ☐ Emails
- ☐ Advertisements (online, print, billboards or radio)
- ☐ Utility bill inserts
- ☐ Newspaper stories
- ☐ From a community organization
- ☐ From my elected officials' newsletters
- ☐ From my city or county
- ☐ Other (please specify):

Final Thoughts

Share with us any final thoughts that will help us *"create an equitable and sustainable future for the San Diego region".*

SAN DIEGO COMMUNITY POWER

Over the next 5 years, what would be your vision for a clean energy community?	Is there anything else you would like SDCP to know in order to best serve you?

That's it! Thank you for taking this brief survey!

If you would like to enter for a chance to win a $50 gift card, please fill out the following sections.

No purchase or payment of any kind is necessary to enter or win. A purchase or payment will not improve chances of winning. By entering this drawing, you accept and agree to be bound by the Official Rules found at SDCommunityPower.org/CPP

Full Name	
Mailing Address	
City/Town	
State	
ZIP/Postal Code	
Email	
Phone Number	

SAN DIEGO COMMUNITY POWER
Staff Report – Item 8

To: San Diego Community Power Board of Directors

From: Laura Fernandez, Director of Regulatory & Legislative Affairs

Via: Karin Burns, Chief Executive Officer

Subject: Update on the Net Energy Metering (NEM) Proceeding and Update on Regulatory and Legislative Affairs

Date: December 15, 2022

RECOMMENDATIONS

Receive and file update on the Net Energy Metering (NEM) proceeding and the update on regulatory and legislative affairs.

BACKGROUND

Staff will provide regular updates to the Board of Directors regarding SDCP's regulatory and legislative engagement.

ANALYSIS AND DISCUSSION

A) Regulatory Updates

Net Energy Metering (NEM) 3.0 – Rulemaking 20-08-020

As a reminder, SDCP has taken a number of actions previously in this proceeding, including:

- Filing a Joint Reply Brief with San José Clean Energy on NEM 3.0 Party Proposals (see link here)
- Sending a Letter to Governor Newsom and CPUC Commissioners Supporting the Sustainable Growth of the Rooftop Solar Industry in the NEM 3.0 Proceeding (see link here)
- Filing Comments with East Bay Community Energy on the Proposed Net Energy Metering Tariff and Subtariff (see link here)
- Filing Comments with East Bay Community Energy, Redwood Coast Energy Authority and Peninsula Clean Energy on the ALJ's Ruling Setting Aside Submission of the Record to Take Comment on a Limited Basis (see link here)

On November 10, 2022, Administrative Law Judge (ALJ) Kelly A. Hymes issued a ruling withdrawing the December 13, 2021, *Proposed Decision Revising Net Energy Metering Tariff and Subtariffs*. That same day, ALJ Hymes released a new

Proposed Decision (PD) and set December 15, 2022, as the earliest the California Public Utilities Commission (CPUC) could vote to make the decision final.

While the new PD is not ideal for the rooftop solar industry, it is an improvement from the previous version. Particularly, SDCP previously advocated for the following items, which are included in the new PD:

- The PD maintains the legacy status of NEM 1 and 2 customers.
- The PD drops the grid benefit charge and instead moves new customers to electrification rates to promote pairing storage with solar systems. The electrification rates have a fixed charge of $16 per month, which is a significantly lower fixed charge than the previously proposed grid benefit charge.
- The PD adopts a glidepath approach for new customers to lock in the Avoided Cost Calculator (ACC) value they begin with for a period of nine (9) years, allowing them to have more financial security in the payback of their generation systems.
- The PD now requires new customers to pay their bills on a monthly basis in order to avoid bill shocks at the end of the annual true-up cycle. SDCP already does this for existing NEM customers on the generation portion of their bills. This new change means that new customers will have to pay monthly bills on the distribution side of their bills as well. NEM 1 and 2 customers are unaffected.

Among some other notable changes, the new PD states the following:

- New customers shall be placed under a Net Billing structure, rather than Net Metering, with retail export compensation rates better aligned with the value exported energy provides to the grid based on when the energy is used. Moreover, the Net Billing tariff replaces retail rate compensation for exported energy with the Avoided Cost Calculator. The ACC is defined by the CPUC as the “marginal costs a utility would avoid in any given hour.”
- The new PD proposes an adder on top of the ACC (known as the ACC Plus Adder), to provide a glide path to customers from the retail rate-based compensation to the ACC one.
    - The new PD states that because San Diego Gas & Electric (SDG&E) has very high rates, the payback for customers is quicker so therefore an adder is not needed. The new PD also states that all ratepayers shall fund the adder through the public purpose program (PPP) charge.
    - The new PD also does not provide the ACC Plus Adder to non-residential customers.
- On addressing low-income and disadvantaged communities, the new PD states that the self-generation incentive program (SGIP) proceeding will finalize a new $900 million equity fund that was created out of Assembly Bill (AB) 209, with funds to be available starting July 1, 2023.

- Lastly, the new PD creates a transition period between the existing NEM 2.0 tariff and the new Net Billing structure. It states that 120 days after the adoption of the final decision, customers will no longer be able to lock in the NEM 2.0 tariff. If the decision is adopted on December 15, 2022, 120 days after will be April 14, 2023. It also states that 12 months after the adoption of the decision, the investor-owned utilities (IOUs) will have updated their billing systems to accommodate the new Net Billing structure. Therefore, customers who submit their interconnection applications after April 14 will be temporarily placed on NEM 2.0 while the IOU billing systems are in transition.

On November 30, 2022, SDCP filed joint comments with Redwood Coast Energy Authority, East Bay Community Energy, San José Clean Energy, and Peninsula Clean Energy Authority in order to make the following points:

- The Commission should extend the NEM 2.0 sunset period until after the IOUs' billing systems are ready for Net Billing and allow for a 180-day transition.
- SDG&E distribution customers should not be required to pay public purpose program charges to support the ACC Plus Adder for customers in other service areas.
- The CPUC should consider additional incentives for low-income customers outside of the SGIP proceeding.
- Non-residential customers should receive the ACC Plus Adder.

On December 5, 2022, SDCP jointly filed reply comments with East Bay Community Energy and Peninsula Clean Energy in order to highlight a previous item we had supported, namely, supporting Sierra Club's recommendation to base glide path step-downs on each additional gigawatt of installed capacity rather than annual changes. Grounding the step-downs in installed capacity allows the glide path to respond to actual market conditions, as the step-downs will correspond to the speed at which solar is adopted.

Green Access Programs Proceeding

As previously reported to the Board, SDCP is tracking the consolidated Green Access Programs (GAP) proceeding which will evaluate the Disadvantaged Communities Green Tariff (DAC-GT), Community Solar Green Tariff (CSGT), and the Green Tariff Shared Renewables (GTSR) programs. Moreover, after the passage of AB 2838 and AB 2316, the GAP proceeding will now consider terminating and/or creating new community energy renewable programs. A Joint Prehearing Conference (PHC) was held on October 27, 2022, which the ALJ used to inform what issues to include within the scope of the proceeding. The resulting scoping memo and ruling, which is found as Attachment C, includes the following in two parts:

- Part A will address an evaluation of the existing GAP programs pursuant to AB 2316.

- Part B will include recommendations for improving the GAP programs, including proposals for new tariffs or programs. It also includes data transfer issues for CCAs and calculation and presentation of the 20% bill discount. Furthermore, part B clarifies that recommendations for new programs should meet all of the requirements outlined in AB 2316, including: (a) efficiently serves distinct customer groups; (b) minimizes duplicative offerings; and (c) promotes robust participation by low-income customers.
- Both parts include consideration of continuing growth of CCAs and any impact departing load may have on currently or newly proposed programs.

SDCP staff will continue to report on the developments of this proceeding and any changes that may result in SDCP's pursuit of becoming a program administrator for the DAC-GT/CSGT programs.

Petition for Modification of Decision (D.)22-05-015 on Modified Cost Allocation Mechanism (MCAM)

Background of D.22-05-015

To address the potential for electricity system resource adequacy shortages, the California Public Utilities Commission ("CPUC") issued Decision (D.)19-11-016 within the Integrated Resource Planning ("IRP") process on November 7, 2019. This Decision directed load serving entities ("LSE") to procure 3,300MW of system-level resource adequacy ("RA") capacity for 2021-2023 and ordered cost recovery through the Modified Cost Allocation Mechanism. However, after D.19-11-016, there was significant load shift to CCAs from the investor-owned utilities ("IOU"), including load shift resulting from the formation of SDCP and five other new CCAs. As such, the CPUC issued D.22-05-015 authorizing a one-time provision for LSEs with new load since 2019 to purchase their customers' share of RA capacity.

Joint CCA Petition for Modification

D.22-05-015 states that authorization to purchase RA capacity is, "a one-time provision that shall be based on the load of the non-IOU LSE, as mutually agreed between the IOU and the non-IOU LSE, as of the effective date of this decision and shall not include any charges for time periods prior to the effective date of this decision." Both SDCP and Clean Energy Alliance ("CEA") experienced load growth after the date of the Decision and interpreted the order to allow the use of its 2023 Year Ahead revised load, which was filed with the CPUC shortly before the issuance of D.22-05-015 and is representative of a mutually agreed upon load share. However, within negotiations SDG&E was unwilling to contract for amounts other than SDCP and CEA's respective load share at the time of the Decision.

Because a resolution could not be reached in bilateral negotiations, on October 28, 2022, SDCP and CEA (Joint CCAs) jointly filed a Petition for Modification ("PFM") of D.22-05-015 to seek clarity and guidance from the CPUC. Specifically, the requested modification would allow for the use of 2023 Year Ahead load forecasts for D.19-11-016 resource allocations.

Updates and Next Steps
On November 28, 2022, SDG&E, Southern California Edison ("SCE"), and the California Choice Energy Authority filed responses to the Joint CCA's PFM. Upon request, the Joint CCAs were granted permission by the ALJ to reply to the responses by December 8, 2022. In addition, the Joint CCAs have met with CPUC Energy Division staff and held an Ex Parte meeting with Commissioner advisors to explain the need for the PFM and answer any questions.

CPUC Order Instituting Rulemaking (OIR) to Consider Distributed Energy Resource Program (DER) Cost-Effectiveness Issues, Data Access and Use, and Equipment Performance Standards

On November 23, 2022, the CPUC issued an Order Instituting Rulemaking ("OIR") to Consider Distributed Energy Resource Program ("DER") Cost-Effectiveness Issues, Data Access and Use, and Equipment Performance Standards. The new rulemaking (R.22-11-013) will continue and expand efforts around cost effectiveness assessments and focus on improving the use of DER customer program data with the aim of supporting the customer experience – especially for customers living in Environmental and Social Justice communities—and advancing California's climate goals.

This rulemaking will have at least two phases:

- **Phase 1** will focus on continuing the cost-effectiveness work begun in R. 14-10-003 and improving access to and use of data to benefit customer programs. Phase 1 will consist of 2 tracks:
    - **Track 1:** Cost-effectiveness issues, including updates to the Avoided Cost Calculator, which models benefits of DER programs, considering adoption of a Societal Cost Test, and determining how to apply air-quality research results into cost-effectiveness frameworks
    - **Track 2:** Data access issues, including streamlined and expedited export of non-public data (where allowed) for regional and local agency access to grid and customer data for their service areas and/or jurisdictional areas (e.g., Renewable Energy Networks, Community Choice Aggregators, and local governments).
- **Phase 2** will consider enacting equipment performance standards and will address issues identified or not completed during Phase 1.

Comments on the OIR are due January 9, 2023 and a prehearing conference and scoping memo is expected in Q1 2023. SDCP staff will continue to track this rulemaking and is exploring engagement strategies, including joint comments with a group of interested CCAs.

California Energy Commission (CEC) Load Management Standards (LMS)

On October 12, 2022, the California Energy Commission ("CEC") voted to adopt updates to the state's Load Management Standards, which seek to establish cost-effective programs and rate structures which will encourage the use of electrical energy at off-peak hours and encourage the control of daily and seasonal peak loads. The background of the CEC LMS and SDCP's engagement in the docket leading to adoption are detailed in the regulatory and legislative staff report for the August 2022 meeting of the Board of Directors (see page 65).

Under the updated standards, which will take effect April 1, 2023, SDCP will be required to comply with the following requirements and timeline:

- April 1, 2024: Submit a compliance plan to rate-approving body describing how SDCP will meet the goals outlined in the updated LMS, including consideration of programs and rate structures and evaluate cost effectiveness, equity, technological feasibility, benefits to the grid.
- October 1, 2024: Submit list of load flexibility programs offered by SDCP deemed cost-effective and in coordination with the utilities and other Large CCAs submit a single, statewide rate information access tool.
- July 1, 2025: Apply to rate-approving body for approval of at least one marginal cost-based rate.
- July 1, 2027: Offer to each of SDCP's electricity customers voluntary participation in either a marginal cost-based rate or program.

SDCP staff is participating in a CEC working group regarding implementation of the updated LMS, including workshops held on November 9 and 29, 2022, and developing SDCP's strategy for complying with the various requirements.

SDG&E's 2023 ERRA Forecast Update

Background

Energy Resource Recovery Account ("ERRA") proceedings are used to determine fuel and purchased power costs which can be recovered in rates. Notably, Power Charge Indifference Adjustment ("PCIA") rates are set in SDG&E's ERRA forecast proceedings based on the difference between the forecasted cost of SDG&E's generation in the target year and the forecasted market value. On May 31, 2022, SDG&E filed its 2023 Energy Resource Recovery Account (ERRA) Forecast. Additional procedural history was outlined in the regulatory and legislative staff report for the October 2022 meeting of the Board of Directors (see page 47).

Update – Proposed Decision of SDG&E's 2023 ERRA Forecast

On November 28, 2022 the CPUC issued a Proposed Decision Approving SDG&E's 2023 Electric Procurement Revenue Requirement Forecasts, 2023 Electric Sales Forecast, and Greenhouse Gas ("GHG") Related Forecasts for inclusion in its retail rates effective January 1, 2023. The Proposed Decision adopted many of the positions argued jointly by SDCP and CEA, (collectively, "CCA Parties"), in briefs and testimony leading up to the Proposed Decision, including:

- Requiring SDG&E to set aside funds and incorporate the proposed program budgets for the Disadvantaged Communities Green Tariff and Community Solar Green Tariff programs contained in Advice Letter 10-E
- Requiring SDG&E to assign a 2022 vintage to the entire 2022 Energy Resource Recovery Account year-end balance
- Denying SDG&E's proposal that interested parties be required to submit any alternative system net sales forecast prior to SDG&E's filing of its ERRA proceeding
- Denying SDG&E's request to transfer the 2023 year-end balance in the PCIA Under Collection Balancing Account to the Portfolio Allocation Balancing Account in this application

On December 5, 2022, the CCA Parties filed opening comments on the Proposed Decision in support of the issues noted above and to address two outstanding issues: (1) valuing the banked renewable energy credits ("RECs") that will be used to meet its renewable portfolio standard ("RPS") shortfall and (2) the accounting framework for implementing SDG&E's Modified Cost Allocation Mechanism ("ModCAM") procurement costs. The CCA Parties filed reply comments on December 8, 2022. The CPUC will adopt a final decision during an upcoming CPUC voting meeting.

CCA Parties Protest to SDG&E's Advice Letter 4103-E
Related to the ERRA forecast proceeding, on December 5, 2022, the CCA Parties Protested SDG&E's Advice Letter 4103-E (see Attachment D). The Protest argues that SDG&E failed to update to the Portfolio Allocation Balancing Account ("PABA") or the ERRA with those recorded balances through October 31 and projected balances for November and December, despite having the data available to do so.

B) Legislative Updates

In continuing to track the implementation of the Inflation Reduction Act (IRA), SDCP submitted responses to a request for information issued by the United States Environmental Protection Agency (U.S. EPA) on the Greenhouse Gas Reduction Fund (GHGRF). On December 5, 2022, SDCP submitted a response asking the US EPA to consider Joint Powers Authority (JPA) governments like

SDCP as direct or indirect eligible recipients for the funds available under the GHGRF. Particularly, the statute creates two distinct funding streams.

One provides $7 billion for states, local governments, tribal entities, and nonprofits to deploy zero-emission technologies. While the other provides nearly $20 billion for nonprofits to increase access to financing for low and zero-emission technologies. SDCP further asked the US EPA to allow applicants to access both pots of funding to enable the greatest impact possible. A copy of the letter is available as Attachment E. SDCP will track the implementation developments of the GHGRF as well as other programs created by the IRA, which may assist SDCP in the implementation of programs the Community Power Plan (CPP) will recommend.

COMMITTEE REVIEW

N/A

FISCAL IMPACT

N/A

ATTACHMENTS

Attachment A: Joint CCAs' Opening Comments on the (new) NEM 3.0 Proposed Decision.
Attachment B: Joint CCAs' Reply Comments on the (new) NEM 3.0 Proposed Decision.
Attachment C: Assigned Commissioner's Scoping Memo and Ruling on the Green Access Programs (GAP) Proceeding.
Attachment D: CCA Parties Protest to San Diego Gas & Electric's Advice Letter 4103-E
Attachment E: Response of SDCP to US EPA's Request for Information on the Greenhouse Gas Reduction Fund from the Inflation Reduction Act.

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Order Instituting Rulemaking to Revisit Net Energy Metering Tariffs Pursuant to Decision 16-01-044, and to Address Other Issues Related to Net Energy Metering.	Rulemaking 20-08-020 (Filed August 27, 2020)

COMMENTS OF SAN DIEGO COMMUNITY POWER, THE REDWOOD COAST ENERGY AUTHORITY, EAST BAY COMMUNITY ENERGY, SAN JOSE CLEAN ENERGY, AND PENINSULA CLEAN ENERGY AUTHORITY ON THE ADMINISTRATIVE LAW JUDGE'S PROPOSED DECISION REVISING NET ENERGY METERING TARIFF AND SUBTARIFFS

Sebastian Sarria
Policy Manager
San Diego Community Power
PO Box 12716
San Diego, CA 92112
ssarria@sdcommunitypower.org
Telephone: 619-657-0415

Aisha Cissna
Regulatory and Legislative Policy Manager
Redwood Coast Energy Authority
233 Third Street
Eureka, CA 95501
acissna@redwoodenergy.org
Telephone: 707-269-1700

Michael Quiroz
Regulatory Analyst
East Bay Community Energy
1999 Harrison St.
Oakland, CA 94612
mquiroz@ebce.org
Telephone: 510-641-0950

Leslie Park
Power Resources Specialist
San Jose Clean Energy
200 E. Santa Clara St.
San José, CA 95113
Leslie.Park@sanjoseca.gov
Telephone: 408-534-2942

Jeremy Waen
Peninsula Clean Energy Authority
2075 Woodside Road
Redwood City, CA 94061
jwaen@peninsulacleanenergy.com
Telephone: 650-257-8026

Dated: November 30, 2022

TABLE OF CONTENTS

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Order Instituting Rulemaking to Revisit Net Energy Metering Tariffs Pursuant to Decision 16-01-044, and to Address Other Issues Related to Net Energy Metering.	Rulemaking 20-08-020 (Filed August 27, 2020)

COMMENTS OF SAN DIEGO COMMUNITY POWER, REDWOOD COAST ENERGY AUTHORITY, EAST BAY COMMUNITY ENERGY, SAN JOSE CLEAN ENERGY, AND PENINSULA CLEAN ENERGY AUTHORITY ON THE ADMINISTRATIVE LAW JUDGE'S PROPOSED DECISION REVISING NET ENERGY METERING TARIFF AND SUBTARIFFS

San Diego Community Power, Redwood Coast Energy Authority, East Bay Community Energy, San Jose Clean Energy, and Peninsula Clean Energy Authority, (together, "Joint CCAs") respectfully submit these comments in response to the proposed *Decision Revising Net Energy Metering Tariff and Subtariffs*, issued on November 10, 2022 ("New PD").

I. Introduction

The Joint CCAs applaud the withdrawal of the December 13, 2021, Proposed Decision ("Original PD").[1] As noted in previous comments of the Joint CCAs, the California Public Utilities Commission ("CPUC" or "Commission") faces difficulty balancing competing statutory objectives. To recap, the challenge before the Commission is to simultaneously:

[1] *See ALJ's Ruling Withdrawing the December 13, 2021 Proposed Decision on R. 20-08-020.* https://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=498526461

- Allow customer-sited renewable distributed generation to grow sustainably,
- Ensure equity, and
- Ensure that grid costs and benefits from a new net energy metering ("NEM") tariff balance out.

It is clear from comments in the record of this proceeding that the Original PD sought to do too much, too quickly. Therefore, the Joint CCAs appreciate the effort by the Commission to carefully review and revisit the record through the May 9, 2022 *Administrative Law Judge's Ruling Setting Aside Submission of the Record to Take Comment on a Limited Basis*, and ultimately through the New PD. The Joint CCAs are appreciative of many of the changes that are reflected in the New PD, and overall believe the New PD is a significant improvement over the Original PD. However, the Joint CCAs discuss below a few additional areas where there is room for improvement and clarification.

First, in outlining the transition to the Net Billing tariff, the Commission states that it would provide new NEM customers with 120 days after the adoption of this PD to secure the NEM 2.0 tariff.[2] Moreover, it would require the Joint Utilities to update their billing systems a year after the adoption of this decision.[3] This quick turnaround is concerning to the Joint CCAs from a customer service experience perspective, and the Joint CCAs instead recommend that the investor-owned utilities ("IOU's") billing systems are updated first. Once that occurs, or is near completion, the Joint CCAs propose that the sunset period begin and also be extended from 120 to 180 days. Second, the New PD also states that the Avoided Cost Calculator ("ACC") Plus

[2] *See Proposed Decision at pg. 186.*
[3] *See Proposed Decision at pg. 188.*

Adder will be funded by all ratepayers through the Public Purpose Program ("PPP") charge.[4] Since the new PD does not propose to provide an adder to San Diego Gas & Electric ("SDG&E") distribution customers, the Joint CCAs would like to seek clarification that SDG&E customers are not required to pay the Public Purpose Program ("PPP") charges to support the ACC Plus Adder in other IOU service areas. Third, in addressing the needs of low-income customers, the Commission states that an equity fund created by Assembly Bill ("AB") 209 will be available through the Self-Generation Incentive Program ("SGIP")[5][6] In addition, when conducting the evaluation of the Net Billing tariff, the Joint CCAs encourage the Commission to consider additional incentives for low-income and disadvantaged communities. [7] Finally, to better achieve the tariff's goal of ensuring equitable treatment among customer classes, the Joint CCAs ask the Commission to adjust the net billing tariff's treatment of nonresidential customers. Each of these points is discussed in further detail below.

II. The Commission Should Extend the NEM 2.0 Sunset Period Until After the IOUs' Billing Systems Are Ready for Net Billing and Allow for a 180 Day Transition

The Joint CCAs appreciate the PD's findings that NEM 1.0 and 2.0 customers should remain on their respective tariffs. This will provide clarity to existing customers that made investments in their systems prior to the issuance of the new PD. In articulating the transition to the Net Billing tariff, the Commission states that there will be five key steps that the IOUs will need to take to implement the decision, including: Step 4) a sunset period of the NEM 2.0 tariff for new customers until 120 days after the adoption of the New PD[8] and Step 5) IOU billing

[4] *See Proposed Decision at pgs. 150 and 219.*
[5] *See Proposed Decision at pg. 163-172.*
[6] *See Proposed Decision at pg. 171.*
[7] *See Joint CCA Comments submitted July 10, 2022.*
[8] *See Proposed Decision at pg. 186.*

systems overhaul "within 12 months following adoption of this decision, [...] to full implementation of the successor tariff."[9] If the New PD is adopted at the December 15, 2022 Business Meeting, all systems will need to be ready by December 15, 2023. The Joint CCAs express concern for this timing, as it is likely that this is not enough time for the Joint Utilities to undergo this system change. This concern is underscored by the record[10], specifically comments the Joint Utilities submitted, stating it would take between 12 and 24 months to update their billing systems and other necessary platforms[11].

Moreover, since the PD states that customers who complete interconnection applications after the sunset date will be on the NEM 2.0 tariff until the IOU billing systems are operationalized, this may create confusion among customers who are making the investment to install solar and storage systems. This confusion may be exacerbated in the likely event that there are delays in implementing the IOU billing system changes necessary to accommodate the Net Billing tariff. Therefore, in order to ensure the best customer service experience possible, the Joint CCAs recommend that the order of the steps be switched so the IOU billing systems overhaul be concluded prior to the sunset period and customer enrollment in Net Billing. By focusing on updating the IOU billing systems first, the Commission will ensure the least amount of customer confusion. This will account for possible delays that would otherwise affect the customer experience. As such, once the systems are ready for the Net Billing tariff, or close to ready, the sunset period can begin. The Joint CCAs further recommend that the sunset date be amended from 120 days to 180 days. This change will provide clarity to the solar industry and new customers looking to make a sound financial investment.

[9] *See Proposed Decision at pg. 188.*

[10] *See Proposed Decision FOF at pg. 222.*

[11] *See Joint Utilities Opening Brief at pg. 101 citing IOU-01 at pg. 181.*

III. SDG&E Distribution Customers Should Not Be Required to Pay Public Purpose Program Charges to Support the ACC Plus Adder for Customers in Other Service Areas

The Joint CCAs appreciate the Commission's change from utilizing the Market Transitional Credit ("MTC") to the Avoided Cost Calculator ("ACC") Plus Adder as a glide path for the solar industry to adapt to the new system of compensating customers for the value of their exports on the ACC.[12] However, the Joint CCAs seek clarification on the funding of the ACC Plus Adder. In describing the ACC Plus values for the three IOUs, the Commission states that due to higher rates in SDG&E's service area, SDG&E residential customers will not be eligible to receive an adder.[13] The Commission further states that "funding for the adder will be provided by all ratepayers through PPP charge".[14] It is not currently clear whether the adder will be collected from ratepayers statewide, including in the SDG&E service area.

Given that the New PD acknowledges SDG&E already has incredibly high rates, it would be inequitable to require SDG&E ratepayers to pay an *additional* PPP charge to fund the adder for ratepayers in the PG&E and SCE service areas, while SDG&E customers would not be able to access the benefit of the adder.

The New PD states that it is "reasonable to collect data to monitor the affordability of the successor tariff and continued equity among customers."[15] However, equity will not be achieved if the Commission requires SDG&E distribution customers to fund the adder for customers in the PG&E and SCE service areas. While the Joint CCAs acknowledge that the PPP charge is to support broad policy goals across the state, and that this funding is often inequitably

[12] *See Proposed Decision at pg.4.*
[13] *See Proposed Decision at pg. 148.*
[14] *See Proposed Decision at pgs. 150 and 219.*
[15] *See Proposed Decision at pg. 152.*

distributed, the particular proposal appears to be unique in that SDG&E distribution customers would be completely ineligible to benefit from the adder. Requiring SDG&E distribution customers to pay an additional charge, and not allowing them to access the benefit of that charge, because SDG&E customers already pay the highest rates, seems to be particularly egregious. Therefore, the Joint CCAs seek to clarify that the PPP funding for the ACC Plus Adder will only be collected from customers in the PG&E and SCE service areas.

IV. The CPUC Should Consider Additional Incentives for Low-Income Customers

The Joint CCAs appreciate the Commission's focus on addressing access to solar and storage systems by low-income customers. However, given the Commission's reliance on the Self-Generation Incentive Program ("SGIP") proceeding[16] and the equity fund created by Assembly Bill ("AB") 209 within that proceeding,[17] the Joint CCAs have concerns that possible delays may impact the availability of funds starting July 1, 2023. Considering the rate at which SGIP funds previously expired, the Joint CCAs encourage the Commission to specifically consider additional incentives for customers in low-income and disadvantaged communities when conducting the evaluation.[18]

V. Non-Residential Customers Should Receive the ACC Plus Adder

The Joint CCAs maintain that non-residential customers should receive the ACC Plus Adder[19] and ask the Commission to revise the new PD to apply equal treatment to both residential and non-residential customers. This revision is sound in principle and also reconciles

---

[16] *See R.20-05-012.*
[17] *See Proposed Decision at pg. 163-172.*
[18] *See Proposed Decision at pg. 163.*
[19] *See Joint CCA Comments submitted July 10, 2022.*

conflicting Findings of Fact ("FOF") in the Proposed Decision that inform the CPUC's decision to exempt nonresidential customers from the ACC Plus Adder.[20]

FOF 24 indicates that the Lookback Study found nonresidential customers under the NEM 2.0 tariff are not cost-effective, but also states in FOF 23 that the nonresidential sector passed several cost-effectiveness tests.[21] In addition to being cost-effective by all but one cost-effectiveness tests, nonresidential customers under NEM 2.0 pay more in bills than the cost to serve them[22]. The Proposed Decision interprets equity amongst ratepayers to translate to ensuring, "[…] the tariff is based on the generator's true costs and benefits to the grid."[23] These findings were based on the more generous NEM 2.0 decision; dropping the export compensation rate even lower further increases the amount that nonresidential customers will pay for grid services while not resolving their higher cost-of-service. Exempting nonresidential customers from an ACC Plus Adder glide path will further exacerbate the disproportionately high ratio of costs to grid benefits they currently receive.

Applying the ACC Plus Adder to nonresidential customers furthers equitable treatment based on the fact that low-income and disadvantaged communities currently do not receive the benefits they should under the current NEM paradigm. Many nonresidential customers are also members of low-income and disadvantaged communities and/or provide critical services to low-income and disadvantaged communities. Numerous CCAs assist local government agencies, such as low-income school districts, with installing NEM systems. The precipitous drop-off in

[20] *See Proposed Decision at pgs. 190-213.*
[21] *See Proposed Decision at pg. 192.*
[22] *See Lookback Study at pg. 5.*
[23] *See Proposed Decision at pg. 138.*

export compensation to nonresidential customers will hit under-resourced government agencies, not to mention small businesses, especially hard.

The Commission relies on the Lookback Study as a way to craft a "tariff that corrects or replaces elements that resulted in negative outcomes."[24] The CPUC can achieve this end by applying the ACC Plus Adder to the commercial, industrial, agricultural, and public sectors.

VI. Conclusion

The Joint CCAs appreciate the opportunity to submit these comments on the New PD. As mentioned earlier, we applaud the withdrawal of the Original PD and the Commission taking time to thoroughly review the issues before them. Moreover, we request that the Commission revise the new PD to: i) begin the NEM 2.0 sunset period after the IOU's billing systems are ready for Net Billing and allow for a 180-day transition; ii) ensure that SDG&E distribution customers will not be required to pay PPP charges to support the ACC Plus Adder for customers in other service areas; iii) consider additional incentives for low-income customers; and iv) for non-residential customers to also receive the ACC Plus Adder.

Respectfully submitted,

/s/ Sebastian Sarria
Sebastian Sarria
Policy Manager
San Diego Community Power
PO Box 12716
San Diego, CA 92116
E-mail: ssarria@sdcommunitypower.org
Telephone: 619-657-0415

/s/ Aisha Cissna

[24] *See Proposed Decision Conclusion of Law 1 at pg. 213.*

Aisha Cissna
Regulatory and Legislative Policy Manager
Redwood Coast Energy Authority
233 Third Street Eureka, CA 95501
E-mail: acissna@redwoodenergy.org
Telephone: 707-269-1700

/s/ Michael Quiroz
Michael Quiroz
Regulatory Analyst
East Bay Community Energy
1999 Harrison St.,
Oakland, CA 94612
E-mail: mquiroz@ebce.org
Telephone: 510-641-0950

/s/ Leslie Park
Leslie Park
Power Resources Specialist
San Jose Clean Energy
200 E. Santa Clara St.
San José, CA 95113
E-mail: leslie.park@sanjoseca.gov
Telephone: 408-534-2942

/s/ Jeremy Waen
Jeremy Waen
Director of Regulatory Policy
Peninsula Clean Energy Authority
2075 Woodside Road
Redwood City, CA 94061
E-mail: jwaen@peninsulacleanenergy.com
Telephone: 650-257-8026

Dated: November 30, 2022

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Order Instituting Rulemaking to Revisit Net Energy Metering Tariffs Pursuant to Decision 16-01-044, and to Address Other Issues Related to Net Energy Metering.	Rulemaking 20-08-020 (Filed August 27, 2020)

JOINT CCA REPLY COMMENTS TO SIERRA CLUB OPENING COMMENTS ON PROPOSED DECISION REVISING NET ENERGY METERING TARIFF AND SUBTARIFFS

Michael Quiroz
Regulatory Analyst
East Bay Community Energy
1999 Harrison Street, Suite 800
Oakland, CA 94612
Email: mquiroz@ebce.org
Telephone: 510-641-0950

Sebastian Sarria
Policy Manager
San Diego Community Power
PO Box 12716
San Diego, CA 92112
Email: ssarria@sdcommunitypower.org
Telephone: 619-657-0415

Jeremy Waen
Director of Regulatory Policy
Peninsula Clean Energy Authority
2075 Woodside Road
Redwood City, CA 94061
Email: jwaen@peninsulacleanenergy.com
Telephone: 650-257-8026

Dated: December 5, 2022

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Order Instituting Rulemaking to Revisit Net Energy Metering Tariffs Pursuant to Decision 16-01-044, and to Address Other Issues Related to Net Energy Metering.	Rulemaking 20-08-020 (Filed August 27, 2020)

JOINT CCA REPLY COMMENTS TO SIERRA CLUB OPENING COMMENTS ON PROPOSED DECISION REVISING NET ENERGY METERING TARIFF AND SUBTARIFFS

East Bay Community Energy (EBCE), San Diego Community Power (SDCP), and Peninsula Clean Energy Authority (PCE), (together "Joint CCAs"), respectfully submit these reply comments in response to Sierra Club's opening comments on the *Decision Revising Net Energy Metering Tariff and Subtariffs*, issued on November 10, 2022.

As previously discussed in Joint CCA opening comments on the *Decision Revising Net Energy Metering Tariff and Subtariffs* issued on December 13, 2021, the Joint CCAs are supportive of Sierra Club's recommendation to base glide path step-downs on each additional gigawatt of installed capacity rather than annual changes. Grounding the step-downs in installed capacity allows the glide path to respond to actual market conditions, as the step-downs will correspond to the speed at which solar is adopted.

The Joint CCAs appreciate the opportunity to submit reply comments in this proceeding and encourage the CPUC to consider this more effective approach.

Respectfully submitted,

/s/ Michael Quiroz
Michael Quiroz
Regulatory Analyst
East Bay Community Energy
1999 Harrison Street, Suite 800
Oakland, CA 94612
E-mail: mquiroz@ebce.org
Telephone: 510-641-0950

/s/ Sebastian Sarria
Sebastian Sarria
Policy Manager
San Diego Community Power
PO Box 12716
San Diego, CA 92112
Email: ssarria@sdcommunitypower.org
Telephone: 619-657-0415

/s/ Jeremy Waen
Jeremy Waen
Director of Regulatory Policy
Peninsula Clean Energy Authority
2075 Woodside Road
Redwood City, CA 94061
Email: jwaen@peninsulacleanenergy.com
Telephone: 650-257-8026

Dated: December 5, 2022

COM/ARD/mef 12/2/2022

FILED
12/02/22
11:20 AM
A2205022

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas And Electric Company (U39E) for Review of the Disadvantaged Communities – Green Tariff, Community Solar Green Tariff and Green Tariff Shared Renewables Programs.	Application 22-05-022
And Related Matters.	Application 22-05-023 Application 22-05-024

ASSIGNED COMMISSIONER'S SCOPING MEMO AND RULING

This Scoping Memo and Ruling (Scoping Memo) sets forth the category, issues to be addressed, need for hearing, and schedule of the proceeding pursuant to Public Utilities (Pub. Util.) Code § 1701.1 and Article 7 of the Commission's Rules of Practice and Procedure (Rules).

1. Background

On May 31, 2022, Pacific Gas and Electric Company (PG&E) filed Application (A.) 22-05-002, seeking review of the Disadvantaged Communities Green Tariff (DAC-GT), Community Solar Green Tariff (CSGT), and Green Tariff Shared Renewables (GTSR) programs. The GTSR program has two components: the Green Tariff (GT) component and the Enhanced Community Renewables (ECR) component.

On July 6, 2022, response and protests were filed by the City and County of San Francisco (San Francisco); Coalition for Community Solar Access (CCSA); Center for Biological Diversity (Center); Public Advocates' Office of the

California Public Utilities Commission (Cal Advocates); Small Business Utility Advocates (SBUA); Solar Energy Industries Association (SEIA); The Utility Reform Network (TURN); and East Bay Community Energy, Marin Clean Energy, Peninsula Clean Energy Authority, San José Clean Energy, Clean Power Alliance of Southern California, Lancaster Choice Energy, Pico Rivera Innovative Municipal Energy, San Jacinto Power, and San Diego Community Power (collectively, the Joint CCAs). On July 18, 2022, PG&E filed a reply to parties' protests and responses.

On May 31, 2022, San Diego Gas & Electric Company (SDG&E) filed A.22-05-023, seeking review of SDG&E's Green Access Programs pursuant to Decision (D.) 18-06-027 and D.21-12-036. On July 6, 2022, responses and protests were filed by Cal Advocates, CCSA, Center, Joint CCAs, SEIA, SBUA, TURN, and Clean Energy Alliance and San Diego Community Power (referred to collectively as San Diego CCAs). On July 18, 2022, SDG&E filed a reply to parties' protests and responses.

On May 31, 2022, Southern California Edison Company (SCE) filed A.22-05-024, seeking review of its DAC-GT, CSGT, and GTSR programs. On July 6, 2022, responses and protests were field by Cal Advocates, CCSA, Center, Joint CCAs, SBUA, SEIA, and TURN. On July 18, 2022, SCE filed a reply to parties' protests and responses.

On July 26, 2022, Cal Advocates filed a motion to consolidate the three applications into one proceeding. On August 10, 2022, an Administrative Law Judge's (ALJ) ruling granted the motion to consolidate the three applications. On September 12, 2022, an ALJ ruling requested submission of a Joint Prehearing Conference (PHC) Statement. On October 5, 2022, PG&E filed a Joint PHC Statement on behalf of parties. A PHC was held on

October 27, 2022 to address the scope of issues, need for hearing, proceeding schedule, and other procedural matters.

2. Scope of Issues

After considering the responses to the Applications, recent legislation, Joint PHC Statement, and discussion at the PHC, we determine that the evaluation of the existing Green Access Programs, as required by Assembly Bill (AB) 2316 (Ward, 2022), should be conducted by parties. At this time, we decline to retain an independent evaluator to conduct an evaluation pursuant to AB 2316; however, the Commission may retain an independent evaluator in the future as warranted.

The scope of issues, including issues to be evaluated, are set forth below. We encourage parties to work together to submit joint evaluations and proposals, as detailed below.

Part A. Evaluation of the Existing Green Access Programs.

Parties may evaluate all of the Green Access Programs or only a subset of the programs. A comprehensive evaluation of the performance of the existing Green Access Programs, pursuant to the requirements of AB 2316, must address each of the following components:

1. Propose working definitions and criteria for the following goals outlined in AB 2316, to determine whether each program meets these goals: (a) efficiently serves distinct customer groups; (b) minimizes duplicative offerings; and (c) promotes robust participation by low-income customers.
2. Evaluate the GTSR program (including GT and ECR programs), the DAC-GT program, and the CSGT program, applying the objectives of AB 2316 to determine whether each program meets the following goals: (a) efficiently serves distinct customer groups; (b) minimizes duplicative

offerings; and (c) promotes robust participation by low-income customers.

3. Consider the continuing growth of Community Choice Aggregators (CCAs) and any impact departing load may have on current programs.

<u>Part B. Recommendations for Improving Green Access Programs</u>.

To improve the existing Green Access Programs, parties may provide to modify an existing tariff or program, or provide a recommendation for establishing a new tariff or program, if doing so would be beneficial to ratepayers (taking into account AB 2838 (O'Donnell, 2022)).

1. A viable recommendation must address the following issues:
    a. How the recommendation specifically addresses any findings or gaps identified in your evaluation (or other parties' evaluations) of existing programs.
    b. How a new community renewable energy program meets all of the requirements outlined in AB 2316, Pub. Util. Code § 769.3(c)(1)–(6).
    c. Consider the continuing growth of CCAs and any impact departing load may have on new tariff proposals.
2. Depending on the program, a recommendation may address various issues and objectives, which are outlined in detail in Appendix A.

3. Schedule

After consideration of the discussion at the PHC, it is apparent that the timeline to access new federal and/or state funding sources related to community renewables programs (such as the Inflation Reduction Act and California Senate Bill 846 (Dodd, 2022)) has not yet been determined. The assigned Commissioner or ALJs may modify this schedule as necessary to promote the efficient management and fair resolution of this proceeding. As such, the below schedule is adopted for this proceeding.

Event	Date
Proposals served as Opening Testimony – includes party evaluation of existing programs and proposals for revised and new programs	January 20, 2023
Workshop	Mid-February 2023
Revised Proposals served as Amended Opening Testimony	TBD
Reply Testimony on Proposals	March 17, 2023
Rebuttal Testimony on Proposals Motion for Hearings, Oral Argument, or Request for Briefing Due	March 31, 2023
Proposed Decision	Q3 2023

If there are workshops in this proceeding, notice of workshops will be posted on the Commission's Daily Calendar to inform the public that decision-maker or an advisor may be present at the workshop. Parties shall check the Daily Calendar regularly for such notices.

Based on this schedule, the proceeding will be resolved within 18 months as required by Pub. Util. Code § 1701.5.

4. Categorization

This ruling confirms the Commission's preliminary determination in Resolution ALJ 176-3511 that this is a ratesetting proceeding. Accordingly, *ex parte* communications are restricted and must be reported pursuant to Article 8 of the Commission's Rules.

5. Need for Hearing

Based on the Joint PHC Statement and discussion at the PHC, we determine that evidentiary hearings are not needed at this time. Pursuant to Rule 11.1 of the Commission's Rules, however, any party may make a motion to request evidentiary hearings on matters within the scope of this proceeding. The above proceeding schedule sets forth a deadline to file motions for evidentiary hearings.

6. Oral Argument

Pursuant to Rule 13.14(b), motion for oral argument shall be made no later than the deadline for rebuttal testimony on proposals, March 31, 2023.

7. Discovery

Discovery may be conducted by the parties consistent with Article 10 of the Commission's Rules. Any party issuing or responding to a discovery request shall serve a copy of the request or response simultaneously on all parties. Electronic service under Rule 1.10 is sufficient, except Rule 1.10(e) does not apply to the service of discovery and discovery shall not be served on the ALJs. Deadlines for responses may be determined by the parties. Motions to compel or limit discovery shall comply with Rule 11.3.

8. Public Outreach

Pursuant to Pub. Util. Code § 1711(a), I hereby report that the Commission sought the participation of those likely to be affected by this matter by noticing it in the Commission's monthly newsletter that is served on communities and businesses that subscribe to it and posted on the Commission's website.

9. Intervenor Compensation

Pursuant to Pub. Util. Code § 1804(a)(1), a party who intends to seek an award of compensation must file and serve a notice of intent to claim compensation by November 28, 2022, 30 days after the PHC.

10. Public Advisor

Any person interested in participating in this proceeding who is unfamiliar with the Commission's procedures or has questions about the electronic filing procedures is encouraged to obtain more information at http://consumers.cpuc.ca.gov/pao/ or contact the Commission's Public Advisor at 1-866-849-8390 or 1-415-703-2074 or 1-866-836-7825 (TYY), or send an e-mail to public.advisor@cpuc.ca.gov.

11. Service of Documents on Commissioners and Their Personal Advisors

Rule 1.10 requires only electronic service on any person on the official service list. When serving documents on the ALJs, Commissioners, or their personal advisors, whether or not they are on the official service list, parties must only provide electronic service. Parties must not send hard copies of documents to Commissioners, their personal advisors, or the ALJs unless specifically instructed to do so.

12. Settlement and Alternative Dispute Resolution (ADR)

The Commission offers ADR services consisting of mediation, facilitation, or early neutral evaluation. Use of ADR services is voluntary, confidential, and at no cost to the parties. Trained ALJs serve as neutrals. The parties are encouraged to visit the Commissioner's ADR webpage at http://www.cpuc.ca.gov/adr, for more information.

If requested, the assigned ALJ will refer this proceeding, or a portion of it, to the Commission's ADR Coordinator. Alternatively, the parties may contact the ADR Coordinator directly at adr_program@cpuc.ca.gov. The parties will be notified as soon as a neutral has been assigned; thereafter, the neutral will contact the parties to make pertinent scheduling and process arrangements.

Alternatively, and at their own expense, the parties may agree to use outside ADR services.

13. Assignment of Proceeding

Alice Reynolds is the assigned Commissioner and Debbie Chiv and Kelly A. Hymes are the assigned ALJs for the proceeding.

IT IS RULED that:

1. The scope and schedule of this proceeding is set forth in Section 2 and Section 3 above.
2. The assigned Commissioner or Administrative Law Judges may adjust the proceeding schedule as necessary for efficient management and fair resolution of this proceeding.
3. Evidentiary hearings are not required at this time.
4. The category of the proceeding is ratesetting.

Dated December 2, 2022, at San Francisco, California.

/s/ ALICE REYNOLDS
Alice Reynolds
Assigned Commissioner

APPENDIX A

APPENDIX A

Part B. Recommendations for Improving Green Access Programs.

To improve the existing Green Access Programs, parties may propose to modify an existing tariff or program, or provide a recommendation for establishing a new tariff or program, if doing so would be beneficial to ratepayers (taking into account AB 2838).

1. A viable recommendation must address the following issues.
   a. How the recommendation specifically addresses any findings or gaps identified in your evaluation (or other parties' evaluations) of existing programs.
   b. How a new community renewable energy program meets all of the requirements outlined in AB 2316, Pub. Util. Code § 769.3(c)(1)–(6).
   c. Consider the continuing growth of CCAs and any impact departing load may have on new tariff proposals.
2. Depending on the program, a recommendation may address the following issues and objectives.
   a. A recommendation to modify or terminate an existing Green Access Program, or establish a new program, pursuant to AB 2316 or AB 2838, may consider:
      i. How a program may impact participating and non-participating ratepayers.
      ii. The impact of a proposed program's incremental ratepayer and grid benefits in the context of the current integrated resource planning (IRP) processes that yield a preferred system plan portfolio.
      iii. For a new program proposal, how state, federal or ratepayer funding will be utilized by a proposed program, including: (a) date(s) by which applications are due; (b) date(s) funding is expected to be awarded; and (c) date(s) by which funds must be spent. Provide a detailed explanation and quantification of why an accelerated review timeline is in the best interest for ratepayers, including any citations to associated state or federal funding sources.
      iv. An appropriate path or process for cost recovery.

v. How to reconcile existing Power Purchase Agreements between developers and the CCAs/investor-owned utilities.

vi. Identifying any remaining options for customers seeking greener power.

vii. Ensuring developers and participating customers are made whole.

viii. Consumer protections and concerns, such as ensuring participating customer bill savings, where applicable.

b. For any of the Green Access Programs, consideration of methodologies for program improvement, such as:

i. The use of renewable portfolio standard resources in limited circumstances;

ii. Authorization to cease program solicitations, or seek program suspension or termination;

iii. Cost-effectiveness metrics for ongoing program evaluation or trigger mechanisms, such as negative prices or solicitations that yield no contracts, which would require additional review; and

iv. The impact of a program's incremental ratepayer and grid benefits in the context of the current IRP processes that yield a preferred system plan portfolio.

c. For the DAC-GT/CSGT programs, consideration of methodologies for program improvement, such as:

i. Use of auto-enrollment;

ii. Methodology for determining qualifying disadvantaged communities, including tribal communities;

iii. Discretionary expansion of eligible technology types;

iv. Modification of the timing for submission of budget requests;

v. Use of centralized program reporting;

vi. Addressing CCA expansion within these programs;

vii. Automated data transfers to CCAs for the purposes of facilitating these programs (including data transfers with impacts on customer billing);

viii. Calculation and presentation of 20 percent bill discount for all program participants;

ix. Whether to adjust the community sponsorship requirements for CSGT;

x. More flexible size and location requirements for program-dedicated resources; and

xi. Whether to adjust program cost containment thresholds.[1]

d. For the GT and ECR programs, consideration of methodologies for program improvement, such as:

i. The effectiveness of the required 20-year rate forecast as compared to using a 5-year forecast;

ii. Structural changes to program rate components and/or modification of the rate design, including whether the Power Charge Indifference Adjustment is the best available proxy for rate indifference or cost-effectiveness;

iii. More flexible location requirements for ECR programs and more flexible project size limits for Environmental Justice program eligibility;

iv. Whether capacity reservations (*e.g.,* allocations for Environmental Justice projects and for the City of Davis) should be maintained; and

v. Whether and how to demonstrate community interest in ECR.

(End of Appendix A)

1 *See* Resolution E-4999 at 36.

KEYES&FOX LLP

December 5, 2022

California Public Utilities Commission – Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

By electronic delivery to EDTariffUnit@cpuc.ca.gov

Re: CCA Parties Protest to San Diego Gas & Electric's Advice Letter 4103-E

Dear Energy Division's Tariff Unit:

Pursuant to Rule 7.4.1 of the California Public Utilities Commission's ("CPUC" or "Commission") General Order 96-B, San Diego Community Power ("SDCP") and Clean Energy Alliance ("CEA") (collectively, the "CCA Parties") submit this protest ("Protest") to San Diego Gas & Electric Company ("SDG&E") Advice Letter 4103-E ("Advice Letter") submitted on November 15, 2022.

The Advice Letter reflects an intentional decision by SDG&E to disregard a Commission order. Resolution E-5217 (the "Resolution") requires the Advice Letter to include the "recorded balances through October 31 and projected balances for November and December" of balancing accounts that will change at year's end.[1] SDG&E failed to update the Portfolio Allocation Balancing Account ("PABA") or the Energy Resource Recovery Account ("ERRA") with those recorded balances despite having the data available to do so.

When CCA Parties pointed this out to SDG&E, attempting to give the utility the benefit of the doubt and resolve the issue informally, the utility refused to follow the Resolution and submit a supplemental advice letter. That decision puts SDG&E out of compliance with a Commission order. It also puts SDG&E out of alignment with Pacific Gas and Electric Company ("PG&E") and Southern California Edison ("SCE"), which was the Resolution's primary aim: aligning the year-end advice letters to make review easier and more streamlined across the State's service territories.

1 Resolution E-5217 at Ordering Paragraph 1.

The clear intent of Resolution E-5217 is to give stakeholders as much transparency into the rates they will pay before the year end. Granting this protest will require SDG&E to update these balances as soon as possible. In fact, requiring SDG&E to go one step further and update those balances with the most recently available data, *i.e.*, November's actual recorded balances as well as balances from September and October, prior to December 30, 2022 will provide the most benefit to ratepayers. While the benefits of such transparency may have a muted effect given what little remains of this year, such disposition may encourage SDG&E to follow the clear directives in Resolution E-5217 in future years.

I. Discussion

A. Resolution E-5217's Process is Critical to Transparency and Customers' Understanding of Year-End Rate Increases.

Resolution E-5217 arose in the context of an increase in interest in the utilities' year-end rate change advice letters over the past decade. The inclusion of the Power Charge Indifference Amount in such rate changes, and the widespread increase in customers taking service from Community Choice Aggregators ("CCAs") and Electric Service Providers, resulted in more attention being paid to both those advice letters and the ERRA Forecast proceedings calculating them. The confusing nature of the dual filings, where stale data included in the preliminary advice letter appeared to conflict with more up-to-date data in each utility's ERRA Forecast proceedings, caused problems for both ensuring customers had notice of future changes and for business planning.[2]

Compounding this confusion was the lack of consistency between the advice letters themselves among California's utilities. Differences between utilities included the dates they were filed (September for PG&E, October for SDG&E, and November for SCE), the tier assigned to the advice letters, and the breadth and depth of what each advice letter included.[3] The background of the Resolution discusses these problems and concludes it "is necessary to establish uniform procedures to standardize the end-of-year annual filings to provide a better, more-efficient process.

---

[2] *See, e.g., Joint CCAs' Response to Pacific Gas & Electric Company's Advice Letter 5661-E* (Nov. 4, 2019) (stating "The Advice Letter also reflects on-going consistency and transparency issues common across all PG&E's showings with respect to the [Annual Electric True-Up ("AET")], ERRA and trigger advice letters. The Joint CCAs here again note the difficulty unbundled customers face in understanding their 2020 rates in a reasonable timeframe. The inconsistencies between the utility's AET and trigger advice letters and its testimony and discovery responses in the ERRA proceeding continue to drive the need for more timely, consistent and transparent data.").

[3] Resolution E-5217 at 3-5.

Both staff and interested parties reviewing these ALs for end of year rate changes will benefit from a uniform process."[4]

The Resolution also arose in the context of a change to the procedural schedule in the ERRA Forecast proceedings. Decision 22-01-023 required SDG&E and the other California utilities to submit an October Update in their ERRA Forecast proceedings for the first time, including actual recorded balances through August.[5] Such an update had previously been called the November Update and had included actual recorded balances through September. Thus, D.22-01-023 resulted in the inclusion of one less month of actual recorded balances in 2023 rates.

Resolution E-5217 helps address that lost month by providing actual recorded balances through at least October 31, and potentially also through November 30, with projected balances for the remainder of the year.[6] It also provides a transparent way for the final ERRA Forecast decisions – resolved on December 1 (SCE) and December 15 (SDG&E and PG&E) of this year – to work their way into the advice letter process. The IOUs file a preliminary Tier 2 advice letter on November 15 that includes placeholders for all the rates that will change on January 1, 2023, including the rates set in the ERRA Forecast case. That Tier 2 – which is the subject of this protest for SDG&E – updates the values for the PABA and ERRA year-end balances with actual recorded values through October 31 and forecasted balances for November in December.

On December 30, each utility will submit a Tier 1 Advice Letter. That Tier 1 will include (1) the findings, conclusions, and orders in the ERRA Forecast decisions and (2) *another* update of the forecasted year-end PABA (and ERRA) balances with actual recorded values through November 30, 2022 and projected values for December 2022, to the extent such data is available.[7]

In this way, the Tier 2 and Tier 1 advice letters stemming from the Resolution bridge the gap in recorded balances between the October Update and the January 1 rate implementation. The approach builds on a successful process initially required by Judge Susan Lee and Energy Division in PG&E's 2022 ERRA forecast proceeding via a ruling that required PG&E to update its forecasted generation rates with actual data from October and November.[8] The end result of the Resolution is a lot like that "December Update" from PG&E's ERRA Forecast case last year —

4 *Id* at 4.

5 *See* D.22-01-023 at pp.10-13, Ordering Paragraph 1.

6 Resolution E-5217 at Ordering Paragraphs 2 and 3.

7 *Id*.

8 A.21-06-001, *E-Mail Ruling Ordering Additional Updates with Amended Schedule*, p. 3 (Nov. 24, 2021) (directing PG&E to file updated testimony in December and postponing a final decision until January 13, 2021). SCE also traditionally updated recorded balances via its ERRA Forecast implementing advice letter.

except, in this case, it is implemented on December 30 for inclusion January 1 rates rather than in Q1 of the following year.

This is a great approach for ratepayers because it provides the most up-to-date rate information in a transparent manner. It is the approach PG&E and SCE are following, and it is the approach Resolution E-5217 requires SDG&E to follow here.

B. SDG&E's Unwillingness to Follow a Commission Order.

Ordering Paragraph 1 in Resolution E-5217 states:

> *1. PG&E, SCE, and SDG&E shall each file a Tier 2 AL by November 15 in the year prior to its January 1 consolidated electric revenue requirement and rate change, as follows:*
>
> > *a. The Tier 2 AL shall provide an estimated electric rate change resulting from adjustments that have been authorized or expected to be authorized by the Commission and FERC by the end of the year.*
> >
> > *b. The Tier 2 AL shall provide the projected year-end balances in each of the regulatory accounts related to electric revenue requirement, with recorded balances through October 31 and projected balances for November and December.*

The ERRA and PABA are each a "regulatory account expected to be approved for recovery by the end of the year" because they are the subject to disposition in SDG&E's ERRA Forecast proceeding, A.22-05-025.[9]

These facts are sufficient to grant this Protest. The ERRA and PABA fall under the purview of Resolution E-5217 and, therefore, the Advice Letter must include "the projected year-end balances in each of the regulatory accounts related to electric revenue requirement, with recorded balances through October 31 and projected balances for November and December" for those balancing accounts. It does not.

Supporting this determination is that PG&E and SCE followed the Commission's clear intent and updated all of their account balances, including the ERRA and the PABA in their November 15 submittals. While SDG&E's approach here may follow the same process the utility used in prior years, the Commission issued Resolution E-5217 in August and now requires the utilities to update all of their account balances. It is not necessary for the Commission to order

---

[9] A.22-05-025, *Assigned Commissioner's Scoping Memo and Ruling*, pp. 5-9 (July 25, 2022) (including within scope the resolution of the ERRA and PABA balances and setting a schedule to resolve the proceeding by December 15, 2022). A Proposed Decision is outstanding in the proceeding with a shortened comment period to allow for disposition on December 15, 2022.

SDG&E within SDG&E's ERRA forecast case, A.22-05-025, or any other proceeding, to update its account balances via this advice letter because Resolution E-5217 already does so. It would be far-fetched to argue each and every order given by the Commission needs to be repeated in each and every proceeding it may affect. Neither PG&E nor SCE required further orders to follow an ordering paragraph in a commission resolution.

Lastly, SDG&E submitted a monthly report to the Commission containing the updated ERRA and PABA balances from October 2022 three days earlier than the required deadline, serving them on Friday, November 18, 2022.[10] That timing means SDG&E likely had the data it needed to update its ERRA and PABA balances when it submitted the Advice Letter on November 15. The utility certainly had the data to supplement the advice letter when it opted not to do so after outreach from the CCA Parties. The clear conclusion from these facts is that SDG&E had the data it needed to follow the Commission's order; it simply decided not to do so.

II. Granting This Protest Will Encourage Future Compliance.

It is unfortunate SDG&E was unwilling to do the work necessary to give ratepayers an updated preview of the large rate increases that will soon confront them. It is more unfortunate the timeframes of the advice letter process are insufficient to correct that unwillingness. Even if the CCA Parties had submitted this Protest earlier than today's due date, SDG&E is not required to respond until December 12.[11] Should the Commission agree with this Protest, the relief sought herein — simply knowing the rates customers will pay sooner than the day before they pay them — will be delayed to the point where the transparency may not be worth much. However, an Energy Division disposition granting this Protest can help ensure this type of needless conflict will be avoided in the future.

III. Conclusion

SDG&E opted not to follow a Commission order to update its ERRA and PABA balances. The utility must be required to supplement its advice letter with these balances as soon as possible; and, in order to give ratepayers the most up-to-date information possible, SDG&E should be required to include its November's actual recorded balances in addition to those from October. While delayed transparency may have less benefit to ratepayers this year, it may encourage SDG&E to follow the clear directives in Resolution E-5217 in future years.

---

10 *See* Attachment A to this Protest.

11 General Order 96-B, Section 7.4.3 (setting the deadline for replies as "within five business days after the end of the protest period"). The CCA Parties did not submit an early Protest in the hope that outreach and attempts at informal resolution with SDG&E may be successful. They were not.

Respectfully submitted,

Tim Lindl
Keyes & Fox LLP
580 California Street, 12th Floor
San Francisco, CA 94104
Phone: (510) 314-8385
E-mail: tlindl@keyesfox.com

Counsel to the CCA Parties

ATTACHMENT A

Amy Karazuba
Validation & Analysis Manager
8315 Century Park Court
San Diego, CA 92123-1548

Tel: 858.676.8671
Fax: 858.650.6190
AKarazuba@sdge.com

November 18, 2022

Mr. Pete Skala
Director-Energy Division
California Public Utilities Commission
505 Van Ness Ave, Room 2237
San Francisco, CA 94102-3298

Subject: MONTHLY REPORT OF ERRA BALANCING ACCOUNT – October 2022

Dear Mr. Skala:

Enclosed is San Diego Gas & Electric Company's (SDG&E) Summary Report for October 2022, pursuant to the California Public Utilities Commission Decisions D.02-12-074, D.04-12-048 and D.07-04-020. These Decisions require SDG&E to submit a summary of the monthly activity in the Energy Resource Recovery Account (ERRA) and make source documents available to Energy Division upon request.

In 2019, in accordance with D.18-10-019, SDG&E established the Portfolio Allocation Balancing Account (PABA) to account for above-market electric commodity costs previously recorded in ERRA. D.18-10-019 also required SDG&E to establish an account to record the obligation that accrues for departing load customers in the event that the above-market electric rate for departed load cannot be increased due to a capped rate. Pursuant to this order, in 2020 SDG&E established the Power Charge Indifference Adjustment Balancing Account (CAPBA). Beginning with the monthly Summary Report submitted on March 20, 2020, SDG&E will provide summaries of the PABA and CAPBA accounts similar to that provided for the ERRA account.

SDG&E will provide unredacted versions of the above-mentioned reports only to the Commission. SDG&E will provide redacted versions to the service lists of its ERRA Forecast and R.17-06-026. As mentioned in the enclosed Declaration of Amy Karazuba, the reports provided to the Commission contain information that is confidential pursuant to D.06-06-066.

If you have any questions regarding the information contained in the reports, please contact Joe Bautista at 619-676-2645.

Sincerely,

Amy Karazuba

Amy Karazuba
Validation & Analysis Manager
Electric & Fuel Procurement

San Diego Gas & Electric (SDG&E)
Energy Resource Recovery Account (ERRA)
Account 1150450/2190132 under/over collection

Line #		Notes	Jan 2022	Feb 2022	Mar 2022	Apr 2022	May 2022	Jun 2022	Jul 2022	Aug 2022	Sep 2022	Oct 2022	Nov 2022	Dec 2022
1	Beginning Balance Under/(Over)		-	23,645,583	31,032,418	22,837,712	42,575,873	58,685,254	70,164,251	78,035,969	78,348,352	121,378,090	95,458,941	95,458,941
2	**REVENUES**													
24	**Net Revenues Booked to ERRA**		(38,295,282)	(46,052,875)	(51,585,783)	(37,744,588)	(45,352,855)	(53,737,970)	(75,177,334)	(96,869,755)	(111,426,462)	(85,820,376)	-	-
25														
26	**EXPENSES**													
44	**Total Balancing Account Expenses**		61,937,044	53,433,029	43,381,570	57,450,788	61,404,773	65,133,035	82,957,084	96,963,233	154,178,140	59,535,802	-	-
45														
46	**MISCELLANEOUS**													
47	Carrying Cost Related to Hedging Margin Deposit - Computed		2,541	3,264	4,794	14,794	20,769	25,976	25,925	60,075	64,415	80,297	-	-
48	Disallowance													
49	FF&U Adjustment		-	-	-	-	-	-	-	-	-	-	-	-
50	Charging Station Adjustment													
51	**Net Current Month Under/ (Over) Collection**		23,644,302	7,383,417	(8,199,419)	19,720,994	16,072,687	11,421,041	7,805,675	153,553	42,816,094	(26,204,277)	-	-
52														
53	Interest Rate		0.13%	0.15%	0.21%	0.63%	0.87%	1.08%	1.07%	2.44%	2.57%	3.16%	0.00%	0.00%
54	Monthly Interest Calculation		1,281	3,417	4,713	17,167	36,694	57,956	66,043	158,829	213,645	285,127	-	-
55	Transfers To/From Other Regulatory Accounts													
56	Rounding													
57	Current Month Activity with Interest & Transfers		23,645,583	7,386,834	(8,194,706)	19,738,161	16,109,381	11,478,997	7,871,718	312,382	43,029,739	(25,919,150)	-	-
58	PABA Transfer													-
59	IEMA Transfer													-
60	**Account Balance with Interest & Transfers**		23,645,583	31,032,418	22,837,712	42,575,873	58,685,254	70,164,251	78,035,969	78,348,352	121,378,090	95,458,941	95,458,941	95,458,941

San Diego Gas & Electric
Portfolio Allocation Balancing Account (PABA) - Summary
(Over) / Under Collection

	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Total
Beginning Balance	$ 109,227,746	$ 99,259,110	$ 105,221,381	$ 117,668,834	$ 141,172,429	$ 165,392,036	$ 171,907,763	$ 162,326,231	$ 122,186,254	$ 52,031,520	$ 45,254,614	$ 45,254,614	$ 109,227,746
Total PCIA Revenue (net FFU)	(41,326,892)	(26,614,868)	(34,096,255)	(26,717,398)	(26,543,149)	(33,271,223)	(34,913,769)	(42,682,537)	(45,017,228)	(38,876,971)	-	-	(350,060,291)
Total Amortization	203,448	203,448	203,448	203,448	203,448	203,448	203,448	203,448	203,448	203,448	-	-	2,034,484
Total Procurement Activity	31,143,514	32,360,911	46,320,757	49,949,616	50,448,222	39,431,784	24,979,844	2,050,151	(25,527,312)	31,768,691	-	-	282,926,180
Current Month Activity	(9,979,928)	5,949,492	12,427,952	23,435,666	24,108,521	6,364,009	(9,730,477)	(40,428,937)	(70,341,091)	(6,904,831)	-	-	(65,099,627)
Current Month Interest	11,292	12,780	19,501	67,929	111,088	151,717	148,946	288,961	186,357	127,925	-	-	1,126,496
Current Activity and Interest	(9,968,636)	5,962,272	12,447,453	23,503,595	24,219,609	6,515,726	(9,581,531)	(40,139,976)	(70,154,734)	(6,776,906)	-	-	(63,973,130)
Transfer/Rounding	-	(1)	-	-	(1)	1	(1)	(1)	-	-	-	-	(3)
Ending Balance	**$ 99,259,110**	**$ 105,221,381**	**$ 117,668,834**	**$ 141,172,429**	**$ 165,392,036**	**$ 171,907,763**	**$ 162,326,231**	**$ 122,186,254**	**$ 52,031,520**	**$ 45,254,614**	**$ 45,254,614**	**$ 45,254,614**	**$ 45,254,613**

San Diego Gas & Electric
Power Charge Indifference Adjustment Undercollection Balancing Account (CAPBA) - Electric
Under / (Over) Collection
Account # 1150748 / 2190354

	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	2022 Total
Beginning Balance	6,200,410	5,997,623	5,794,912	5,592,460	5,391,895	5,192,282	4,993,416	4,794,330	4,600,424	4,406,611	4,214,499	4,214,499	**6,200,410**
CAPBA all vintages- trigger amortization	(203,448)	(203,448)	(203,448)	(203,448)	(203,448)	(203,448)	(203,448)	(203,448)	(203,448)	(203,448)	-	-	(2,034,480)
Current month activity	(203,448)	(203,448)	(203,448)	(203,448)	(203,448)	(203,448)	(203,448)	(203,448)	(203,448)	(203,448)	-	-	(2,034,480)
Interest	661	737	996	2,883	3,835	4,582	4,362	9,542	9,635	11,336	-	-	48,569
Transfer Bundled Over- collection to PABA	-	-	-	-	-	-	-	-	-	-	-	-	-
Net Activity	(202,787)	(202,711)	(202,452)	(200,565)	(199,613)	(198,866)	(199,086)	(193,906)	(193,813)	(192,112)	-	-	(1,985,911)
Ending Balance*	**5,997,623**	**5,794,912**	**5,592,460**	**5,391,895**	**5,192,282**	**4,993,416**	**4,794,330**	**4,600,424**	**4,406,611**	**4,214,499**	**4,214,499**	**4,214,499**	**4,214,499**
Trigger Amount	5,997,623	5,794,912	5,592,460	5,391,895	5,192,282	4,993,416	4,794,330	4,600,424	4,406,611	4,214,499	4,214,499	4,214,499	
Balance as % of Forecast Departing Load PCIA Revenu	21.42%	20.70%	19.97%	19.26%	18.54%	17.83%	17.12%	16.43%	15.74%	15.05%	15.05%	15.05%	0.00%

* Amount is offset by Bundled Customer PCIA surcharge

SAN DIEGO COMMUNITY POWER

PO Box 12716
San Diego, CA 92112
sdcommunitypower.org

December 5, 2022

United States Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Agency/Docket Number: EPA-HQ-OA-2022-0859

Re: Request for Information – Greenhouse Gas Reduction Fund
Response of San Diego Community Power

Dear Mr. Zealan Hoover, Senior Advisor to the EPA Administrator, and Mr. Dan Utech, Chief of Staff:

San Diego Community Power (SDCP) is pleased to submit these comments on the design and implementation of the Greenhouse Gas Reduction Fund (GHGRF) program of the historic Inflation Reduction Act (IRA), as outlined in the Request for Information – Greenhouse Gas Reduction Fund.

SDCP is a Community Choice Aggregator (CCA) and the local electricity provider to 731,092 customer accounts in the cities of Chula Vista, Encinitas, Imperial Beach, La Mesa, San Diego, and in 2023, to National City and the unincorporated communities of San Diego County in California. Upon full enrollment next year, SDCP is estimated to serve an estimated 960,000 customer accounts across its service territory. Founded in 2019 as a Joint Powers Authority (JPA) government agency by local municipalities in San Diego Gas & Electric (SDG&E) service territory, SDCP generates more renewable electricity at competitive rates than SDG&E while partnering with them to deliver the electricity and continuing to provide customers with one bill for electric and gas services.

CCAs serve more than 11 million customers in California with 25 distinct CCAs across the three investor-owned utility (IOU) service territories of Pacific Gas & Electric (PG&E), Southern California Edison (SCE), and SDG&E.[1] SDCP is committed to reaching 100 percent renewable energy across its service territory by 2035 and offering an innovative suite of customer programs that prioritizes Communities of Concern (CoC).[2] In prioritizing our communities, SDCP is developing a Community Power Plan (CPP) that incorporates community feedback on what types of programs to pursue over the next five years.[3] As such, our comments are focused on eligible recipients and ensuring access to the distinct funding streams.

---

[1] About CalCCA. https://cal-cca.org/about/
[2] SDCP identifies Communities of Concern as census tracts that have been designated as additionally burdened by socioeconomic and environmental factors by their respective jurisdictions through their Climate Equity Index (CEI) analyses, and defaults to CalEnviroScreen's Disadvantaged Communities Definition of Top 25% burdened in the absence of a CEI. Only the Cities of San Diego and Chula Vista have conducted CEI analyses.
[3] SDCP Community Power Plan. https://sdcommunitypower.org/community-power-plan-cpp/

Section 4: Eligible Recipients

1. *Who could be eligible entities and/or indirect recipients under the Greenhouse Gas Reduction Fund consistent with statutory requirements specified in section 134 of the Clean Air Act? Please provide a description of these types of entities and references regarding the total capital deployed by such entities into greenhouse gas and air pollution reduction projects.*

   Load serving entities (LSEs) that are public agencies, such as Community Choice Aggregators, should be considered eligible entities and/or indirect recipients under the GHGRF. As mentioned earlier, CCAs like SDCP are public government agencies formed by one or more local municipalities for the purpose of procuring more renewable energy for the benefit of local residents and businesses, as well as reinvesting back into our communities for a more equitable, sustainable and prosperous future. In serving the city of San Diego, the 8th largest city in the country, and 2nd largest in the state,[4] ensuring that GHGRF maintains entities like SDCP as eligible will allow millions of residents to benefit from the Inflation Reduction Act.

   As a Joint Powers Authority (JPA) government, SDCP has an obligation to serve the communities under its jurisdiction. Those include the cities of Chula Vista, Encinitas, Imperial Beach, La Mesa, San Diego, National City and the unincorporated communities of San Diego County in California. Founded in 2019 and serving customers since 2021, SDCP offers a minimum 50 percent renewable energy to its customers while offering an optional 100 percent renewable energy tier. Moreover, SDCP and other CCAs throughout California have collectively contracted for more than 11,000 megawatts of new clean energy generation capacity through long-term power purchase agreements (PPAs) of 10 years or more.[5]

   Given CCAs' close ties to their communities and ability to very quickly innovate, they would be great partners to accomplish the goals of the GHGRF and the IRA. Therefore, ensuring that CCAs are eligible entities or indirect recipients will allow millions to participate in, benefit from, and become catalysts in our clean energy transition.

2. *What types of entities (as eligible recipients and/or indirect recipients) could be created to enable Greenhouse Gas Reduction Fund grants to support investment in and deployment of greenhouse gas and air pollution reducing projects in communities where capacity to finance and deploy such projects does not currently exist?*

---

[4] About San Diego, CA. https://bit.ly/3P17AZs

[5] CCA Impact. https://cal-cca.org/cca-impact/

SDCP is a public agency JPA that is also the default load serving entity enabled by state law.[6] We encourage the EPA to evaluate the use of JPAs and other public LSEs like municipally owned utilities as tools to help accelerate the goals of the GHGRF program. For example, SDCP is creating a Community Power Plan (CPP) that will inform the agency's five-year programmatic outlook. By conducting extensive community outreach that included receiving close to 3,000 unique survey responses, SDCP hopes to utilize funding mechanisms such as the ones created by the GHGRF to help deliver critical and innovative programs that will benefit the region we serve.

Section 6: General Comments

1. *Do you have any other comments on the implementation of the Greenhouse Gas Reduction Fund?*

    The statute creates two distinct funding streams under the GHGRF. One provides $7 billion for states, local governments, Tribal entities, and nonprofits to deploy zero-emission technologies. While the second provides nearly $20 billion for nonprofits to increase access to financing for low and zero-emission technologies.[7] SDCP suggests that the EPA allow GHGRF applicants to access both funding streams as that has the potential to increase their impact and reach.

In conclusion, SDCP supports increasing and ensuring equitable access to these opportunities by Communities of Concern. By putting them first, our energy transition will be equitable and just. We thank the U.S. Environmental Protection Agency for the opportunity provide comment on this important program. For any questions about these comments, please contact Sebastian Sarria, Policy Manager, at ssarria@sdcommunitypower.org.

Sincerely,

Karin Burns
Chief Executive Officer

[6] Assembly Bill 117. http://www.leginfo.ca.gov/pub/01-02/bill/asm/ab_0101-0150/ab_117_bill_20020924_chaptered.pdf

[7] United States Code Title 42: The Public Health and Welfare, Chapter 85: Air Pollution Prevention and Control, Section 7434: Greenhouse Gas Reduction Fund. https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter85&edition=prelim

SAN DIEGO COMMUNITY POWER

SAN DIEGO COMMUNITY POWER
Staff Report – Item 9

To: San Diego Community Power Board of Directors

From: Karin Burns, Chief Executive Officer

Subject: Updates to Board Compensation and Reimbursement Policy

Date: December 9, 2022

RECOMMENDATION
Adopt Resolution No. 2022-21 amending the Board Compensation and Reimbursement Policy to Include Meetings of Board Committees.

BACKGROUND
At the February 24, 2022 Board of Directors meeting, the Board of Directors adopted a Board Compensation and Reimbursement Policy to provide per diem compensation to Directors and Alternates for attending SDCP Board meetings and reimbursement for actual and necessary expenses under certain circumstances.

DISCUSSION AND ANALYSIS
Directors are appointed by the Board of Directors to serve on various committees which assist the Board in carrying out its functions and implementing SDCP's programs and the provisions of the JPA Agreement. Under the current Board Compensation and Reimbursement Policy, Directors and Alternates are only eligible to receive per diem compensation for attending meetings of the Board of Directors.

The proposed amendment to the Board Compensation and Reimbursement Policy would authorize per diem compensation of $150 for Directors and alternates attending meetings of Board committees. The amendment would also update the monthly limit on per diem compensation from two (2) payments per month to four (4) payments per month to account for committee attendance.

COMMITTEE REVIEW
None.

FISCAL IMPACT
The Board currently has one standing committee (Financial and Risk Management Committee) that meets on an approximately monthly basis and is composed of three (3) Directors, so the likely financial impact is approximately $5,400. Some Directors may be

eligible to receive per diem compensation from their appointing agency for attendance at SDCP committee meetings, so the actual fiscal impact may be lower.

ATTACHMENTS

Attachment A: Resolution No. 2022-21 Amending the Board Compensation and Reimbursement Policy

Attachment B: Proposed Amendments to Board Compensation and Reimbursement Policy

RESOLUTION NO. 2022-21

A RESOLUTION OF THE BOARD OF DIRECTORS OF SAN DIEGO COMMUNITY POWER AMENDING THE BOARD COMPENSATION AND REIMBURSEMENT POLICY TO INCLUDE ATTENDANCE AT COMMITTEE MEETINGS

A. San Diego Community Power ("SDCP") is a joint powers agency formed pursuant to the Joint Exercise of Powers Act, Cal. Gov. Code § 6500 *et seq.*, California Public Utilities Code § 366.2, and a Joint Powers Agreement first effective on October 1, 2019 ("JPA Agreement"), as amended from time to time.

B. Section 5.10 of the JPA Agreement provides that "the Board may establish rules, regulations, policies, or procedures to govern any such commissions, boards, or committees and shall determine whether members shall be compensated or entitled to reimbursement for expenses."

C. Government Code section 53232 *et seq.* provides that, when authorized by statute, local agencies may pay compensation to members of a legislative body for attendance at certain occurrences and to reimburse members of a legislative body for actual and necessary expenses incurred in the performance of official duties, including the activities described therein.

D. Pursuant to Government Code section 6509 and Section 3.4 of the JPA Agreement, SDCP's powers are subject to the restrictions upon the manner of exercising power possessed by the City of Encinitas, a general law city which is authorized by statute to provide compensation and reimbursement for members of its legislative bodies.

E. On February 4, 2022, the SDCP Board of Directors adopted a Board Compensation and Reimbursement Policy effective March 1, 2022, and amended that Policy on April 28, 2022.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of San Diego Community Power as follows:

Section 1. The Board of Directors hereby amends the Board Compensation and Reimbursement Policy as provided in Exhibit A, attached hereto and incorporated herein.

Section 2. If any provision of this resolution, the attached policy, or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications of the resolution or policy which can be given effect without the invalid provision or application, and to this end the provisions of this resolution and the policy are severable. The Board of Directors hereby declares that it would have adopted this resolution and the attached policy irrespective of the invalidity of any particular portion thereof.

Section 3. This resolution shall take effect immediately upon adoption.

PASSED AND ADOPTED at a meeting of the Board of Directors of San Diego Community Power held on December 15, 2022.

____
Chair, Board of Directors
San Diego Community Power

ATTEST:

____
Secretary, Board of Directors
San Diego Community Power

San Diego Community Power

Board Compensation and Reimbursement Policy

Effective Date: December 15, 2022
Adopted/Amended by Resolution 2022-21

PURPOSE

This policy ("Policy") establishes the terms and conditions for members of the Board of Directors to receive per diem compensation and reimbursement of reasonable and necessary expenses when performing their official duties on behalf of SDCP. This Policy is adopted pursuant to Government Code Section 53232 *et seq.* and must be adopted or amended by resolution.

POLICY

1. **Per Diem Compensation for the Board of Directors.**

    a. Per Diem and Eligible Meetings. Members of the Board of Directors ("Directors") shall be entitled to receive per diem compensation as follows:

        i. $150 per day for attending meetings of the Board of Directors or Board committees, including standing and ad hoc committees.

    b. Alternates. An alternate director ("Alternate") shall be entitled to receive per diem compensation where the Alternate attends a meeting in place of the regular Director. Alternates shall be subject to the terms and conditions applicable to Directors in requesting and receiving per diem compensation under this Policy.

    c. Claim Forms. All per diem requests must be submitted to the Secretary or their designee on a claim form provided by the Secretary within sixty (60) days of the date for which a per diem is requested.

    d. Limitations.

        i. Directors shall not receive more than four (4) per diem payments in any calendar month.

        ii. Directors to whom SDCP would pay a per diem under this Policy shall not receive a per diem if they are otherwise eligible to receive a per diem from their respective appointing agency for attendance at SDCP meetings under this Policy.

2. **Reimbursement of Reasonable and Necessary Expenses.**

    a. Attendance at Meetings and Events on Behalf of SDCP. Directors and Board appointed Committee Members may receive reimbursement for actual and necessary expenses, which may include but not be limited to, travel, meals, lodging, registration, and other expenses incurred in the performance of official duties, for attendance at:

i. Each meeting of other governmental entities and public agencies at which the Director or Committee Member have been designated by the Board of Directors to represent SDCP;

ii. A conference or organized educational activity conducted in compliance with Government Code Section 54952.2(c) at which the Director or Committee Member have been approved by the Board of Directors to attend; and

iii. Other additional meetings or activities at which the Director has been designated by the Board of Directors to represent SDCP.

b. Rates of Reimbursement. Actual and necessary travel, meals, lodging, and other expenses incurred in the performance of official duties as authorized under this Policy shall be reimbursed at the rates established in Internal Revenue Service Publication 463 or any successor publication, except as limited below:

i. For mileage reimbursement using a private vehicle, a Director's mileage costs shall not exceed the cost of coach class airfare plus costs of transportation to and from the airport at the point of departure and destination. Mileage reimbursement shall be equal to the standard rate in effect for business miles deduction by the Internal Revenue Service, as such rate is established from time to time.

ii. For lodging in connection with a conference or other organized educational activity, lodging costs shall not exceed the maximum group rate published by the conference or activity sponsor, provided that lodging at the group rate is available at the time of booking. If the group rate is not available, the Director shall use comparable lodging consistent with this Policy.

iii. Directors shall use government and group rates offered by a provider of transportation or lodging services for travel and lodging whenever available.

iv. If a Director chooses to incur additional costs that are above the rates established under this Policy, or are not otherwise pre-approved by the Board, then the Director may do so at their own expense.

c. Child Care Expenses During Special Board Meetings. Directors may receive reimbursement for actual and necessary child care expenses incurred during the Director's attendance at any meetings of the Board of Directors other than regular Board meetings. The reimbursement rate for child care expenses shall not exceed $20 per hour. If a Director chooses to incur additional costs that are above this rate, or are not otherwise pre-approved by the Board, then the Director may do so at their own expense.

d. Pre-Approval by Board of Directors. Except for reimbursements authorized under subsection (c), all reimbursements under this Policy shall be approved by the Board of Directors in a public meeting before the expense is incurred. All expenses that do not fall within subsection (b) or (c) the rates provided therein shall be approved by the Board of Directors in a public meeting before the expense is incurred.

e. Claim Forms. All expense reimbursement claims must be submitted to the Secretary or their designee within sixty (60) days of incurring the expense on a claim form provided by the Secretary. Claim forms for expense reimbursement shall be accompanied by the receipts documenting each expense. If no receipt is available, a written explanation and other proof of the expenditure (if available) is required.

f. Reporting. Directors shall provide brief reports on attendance at meetings or events subject to reimbursement at the next regular meeting of the Board.

GLOSSARY OF TERMS

AB – Assembly Bill - An Assembly Bill is a piece of legislation that is introduced in the Assembly. In other words, the Assembly, rather than the Senate, is the house of origin in the legislature for the legislation. In California, it is common for legislation to be referred to by its house of origin number (such as, AB 32) even once it becomes law.

AL - Advice Letter - An Advice Letter is a request by a CPUC jurisdictional entity for Commission approval, authorization, or other relief.

ALJ – Administrative Law Judge - ALJs preside over CPUC cases to develop the evidentiary record and draft proposed decisions for Commission action.

ARB – Air Resources Board - The California Air Resources Board (CARB or ARB) is the "clean air agency" in the government of California. CARB is charged with protecting the public from the harmful effects of air pollution and developing programs and actions to fight climate change.

AReM – Alliance for Retail Energy Markets - a not for profit corporation that advocates for continued development of successful customer choice in retail energy markets and provides a focused voice for competitive energy retailers and their customers in selected public policy forums on the state level. AREM represented direct access providers such as Constellation NewEnergy and Direct Energy.

BayREN - Bay Area Regional Energy Network - BayREN offers region-wide energy programs, services and resources to members of the public by promoting energy efficient buildings, reducing carbon emissions and building government capacity.

CAISO – California Independent System Operator - a non-profit independent system operator that oversees the operation of the California bulk electric power system, transmission lines and electricity market generated and transmitted by its members (~80% of California's electric flow). Its stated mission is to "operate the grid reliably and efficiently, provide fair and open transmission access, promote environmental stewardship and facilitate effective markets and promote infrastructure development." CAISO is regulated by FERC and governed by a five-member governing board appointed by the governor.

CALCCA – California Community Choice Association – Association made up of Community Choice Aggregation (CCA) groups which represents the interests of California's community choice electricity providers.

CALSEIA – California Solar Energy Industries - CALSEIA represents more than 200 companies doing solar-related business in California, including manufacturers, distributors, installation contractors, consultants, and educators. Members' annual dues support professional staff and a lobbyist who represent the common interests of California's solar industry at the Legislature, Governor's Office, and state and local agencies.

CALSLA – California City County Street Light Association - statewide association representing cities, counties and towns before the CPUC that is committed to maintaining fair and equitable street light electric rates and facilities charges, and disseminating street light related information.

CAM – Cost Allocation Mechanism - the cost recovery mechanism to cover procurement costs incurred in serving the central procurement function.

CARB – California Air Resources Board – The CARB is charged with protecting the public from the harmful effects of air pollution and developing programs and actions to fight climate change in California.

CARE – California Alternative Rates for Energy - A State program for low-income households that provides a 30% discount on monthly energy bills and a 20% discount on natural gas bills. CARE is funded through a rate surcharge paid by all other utility customers.

CBE – Communities for a Better Environment - environmental justice organization that was founded in 1978. The mission of CBE is to build people's power in California's communities of color and low-income communities to achieve environmental health and justice by preventing and reducing pollution and building green, healthy and sustainable communities and environments.

CCA – Community Choice Aggregator - A community choice aggregator, sometimes referred to as community choice aggregation, allows local governments to procure power on behalf of their residents, businesses, and municipal accounts from an alternative supplier while still receiving transmission and distribution service from their existing utility provider. CCAs are an attractive option for communities that want more local control over their electricity sources, more green power than is offered by the default utility, and/or lower electricity prices. By aggregating demand, communities gain leverage to negotiate better rates with competitive suppliers and choose greener power sources.

CCSF – City and County of San Francisco - The City and County of San Francisco often engage in joint advocacy before the CPUC. San Francisco operates CleanPowerSF, a CCA.

CEC – California Energy Commission - the primary energy policy and planning agency for California, whose core responsibilities include advancing state energy policy, achieving energy efficiency, investing in energy innovation, developing renewable energy, transforming transportation, overseeing energy infrastructure and preparing for energy emergencies.

CEE – Coalition for Energy Efficiency - non-profit comprised of US and Canadian energy efficiency administrators working together to accelerate the development and availability of energy efficient products and services.

CLECA – California Large Energy Consumers Association - an organization of large, high load factor industrial customers located throughout the state; the members are in the cement, steel, industrial gas, pipeline, beverage, cold storage, food packaging, and mining industries, and share the fact that electricity costs comprise a significant portion of their costs of production. Some members are bundled customers, others are Direct Access (DA) customers, and some are served by Community Choice Aggregators (CCAs); a few members have onsite renewable generation.

CPUC – California Public Utility Commission - state agency that regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies, in addition to authorizing video franchises.

C&I – Commercial and Industrial – Business customers. C&I customers generally consume much higher volumes of electricity and gas. Many utilities segment their C&I customers by energy consumption (small, medium and large).

CP – Compliance Period – Time period to become RPS compliant, set by the CPUC (California Public Utilities Commission)

DA – Direct Access – An option that allows eligible customers to purchase their electricity directly from third party providers known as Electric Service Providers (ESP).

DA Cap – the maximum amount of electric usage that may be allocated to Direct Access customers in California, or more specifically, within an Investor-Owned Utility service territory.

DACC – Direct Access Customer Coalition a regulatory advocacy group comprised of educational, governmental, commercial and industrial customers that utilize direct access for all or a portion of their electrical energy requirements

DA Lottery – a random drawing by which DA waitlist customers become eligible to enroll in DA service under the currently-applicable Direct Access Cap.

DA Waitlist – customers that have officially registered their interest in becoming a DA customer but are not yet able to enroll in service because of DA cap limitations.

DAC – Disadvantaged Community - Disadvantaged communities refers to the areas throughout California which most suffer from a combination of economic, health, and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, presence of hazardous wastes as well as high incidence of asthma and heart disease. One way that the state identifies these areas is by collecting and analyzing information from communities all over the state. CalEnviroScreen, an analytical tool created by the California Environmental Protection Agency (CalEPA), combines different types of census tract-specific information into a score to determine which communities are the most burdened or "disadvantaged."

DASR – Direct Access Service Request – Request submitted by C&I customers to become direct access eligible.

Demand - The rate at which electric energy is delivered to or by a system or part of a system, generally expressed in kilowatts (kW), megawatts (MW), or gigawatts (GW), at a given instant or averaged over any designated interval of time. Demand should not be confused with Load or Energy.

DER – Distributed Energy Resource – A small-scale physical or virtual asset (e.g. EV charger, smart thermostat, behind-the-meter solar/storage, energy efficiency) that operates locally and is connected to a larger power grid at the distribution level.

Distribution - The delivery of electricity to the retail customer’s home or business through low voltage distribution lines.

DLAP – Default Load Aggregation Point – In the CAISO’s electricity optimization model, DLAP is the node at which all bids for demand should be submitted and settled.

DR – Demand Response - An opportunity for consumers to play a significant role in the operation of the electric grid by reducing or shifting their electricity usage during peak periods in response to time-based rates or other forms of financial incentives.

DRP – Distributed Resource Plans - plans that are required by statute that are intended to identify optimal locations for the deployment of distributed resources.

DWR – Department of Water Resources – DWR manages California's water resources, systems, and infrastructure in a responsible, sustainable way.

ECR – Enhanced Community Renewable - An IOU program that reflects the "Community Solar" model of renewable energy purchasing. Customers sign up to purchase a portion of a local solar project directly from a Developer at a level that meets at least 25% of their monthly electricity demand, but up to 100%. The customer will pay the Developer for the subscribed output, and receive a credit on their utility bill that reflects their enrollment level.

ED – Energy Division - The CPUC's Energy Division develops and administers energy policy and programs to serve the public interest, advise the Commission, and ensure compliance with the Commission decisions and statutory mandates.

EE – Energy Efficiency- the use of less energy to perform the same task or produce the same result. Energy-efficient homes and buildings use less energy to heat, cool, and run appliances and electronics, and energy-efficient manufacturing facilities use less energy.

ELCC – Effective Load Carrying Capacity – The additional load met by an incremental generator while maintaining the same level of system reliability. For solar and wind resources the ELCC is the amount of capacity which can be counted for Resource Adequacy purposes.

EPIC – Electric Program Investment Charge – The EPIC program was created by the CPUC to support investments in clean energy technologies that provide benefits to the electricity ratepayers of PG&E, San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE)

ERRA – Energy Resource Recovery Account – ERRA proceedings are used to determine fuel and purchased power costs which can be recovered in rates. The utilities do not earn a rate of return on these costs, and only recover actual costs. The costs are forecast for the year ahead. If the actual costs are lower than forecast, then the utility gives money back, and vice versa.

ES – Energy Storage - the capture of energy produced at one time for use at a later time to reduce imbalances between energy demand and energy production.

ESA – Energy Storage Agreement - means a battery services contract, a capacity contract, demand response contract or similar agreement.

ESP – Energy Service Provider - An energy entity that provides service to a retail or end-use customer.

EV – Electric Vehicle - a vehicle that uses one or more electric motors for propulsion.

FCR – Flexible Capacity Requirements - "Flexible capacity need" is defined as the quantity of resources needed by the CAISO to manage grid reliability during the greatest three-hour continuous ramp in each month. Resources will be considered as "flexible capacity" if they can sustain or increase output, or reduce ramping needs, during the hours of "flexible need." "FCR" means the flexible capacity requirements established for LSEs by the CPUC pursuant to the CPUC Decisions.

GHG – Greenhouse gas - water vapor, carbon dioxide, tropospheric ozone, nitrous oxide, methane, and chlorofluorocarbons (CFCs). A gas that causes the atmosphere to trap heat radiating from the earth. The most common GHG is Carbon Dioxide, though Methane and others have this effect as well.

GRC – General Rate Case – Proceedings used to address the costs of operating and maintaining the utility system and the allocation of those costs among customer classes. For California's three large IOUs, the GRCs are parsed into two phases. Phase I of a GRC determines the total amount the utility is authorized to collect, while Phase II determines the share of the cost each customer class is responsible and the rate schedules for each class. Each large electric utility files a GRC application every three years for review by the Public Advocates Office and interested parties and approval by the CPUC.

GTSR – Green Tariff Shared Renewables - The GTSR program enables customers to receive 50 to 100 percent of their electricity demand from renewable sources. The GTSR program has two components: the Green Tariff (GT) component and the Enhanced Community Renewables (ECR) component. Through GT, a customer may pay the difference between their current generation charge and the cost of procuring 50 to 100 percent renewables. With ECR, a customer agrees to purchase a share of a community renewable (typically solar) project directly from a developer, and in exchange will receive a credit from their utility for the customer's avoided generation procurement.

GWh – Gigawatt-hour - The unit of energy equal to that expended in one hour at a rate of one billion watts. One GWh equals 1,000 megawatt-hours.

ICA – Integration Capacity Analysis - The enhanced integrated capacity and locational net benefit analysis quantifies the capability of the system to integrate Distributed Energy Resources (DERs) within the distribution system. Results are dependent on the most limiting element of the various power system criteria such as thermal ratings, power quality, system protection limits and safety standards of existing equipment.

IDER – Integrated Distributed Energy Resources – A CPUC proceeding that aims to more effectively coordinate the integration of demand-side resources in order to better meet customer and grid needs, while enabling California to attain its greenhouse gas reduction goals.

IDSM – Integrated Demand-Side Management - an approach that joins together all the resources utilities have at their disposal to plan, generate and supply electricity in the most efficient manner possible.

IEP – Independent Energy Producers – California's oldest and leading nonprofit trade association, representing the interest of developers and operators of independent energy facilities and independent power marketers.

IMD – Independent Marketing Division - Under state law, IOUs are prohibited from lobbying or marketing on community choice unless the IOU forms an independent marketing division funded by shareholders rather than ratepayers. SDG&E' and its parent company Sempra were permitted by the CPUC to create such an independent marketing division, which allowed SDG&E to lobby against plans to create a CCA program.

IOU – Investor-Owned Utility – A private electricity and natural gas provider, such as SDG&E, PG&E or SCE, which are the three largest IOUs in California.

IRP – Integrated Resource Plan – A plan which outlines an electric utility's resource needs in order to meet expected electricity demand long-term.

kW – Kilowatt – Measure of power where power (watts) = voltage (volts) x amperage (amps) and 1 kW = 1000 watts

kWh – Kilowatt-hour – This is a measure of consumption. It is the amount of electricity that is used over some period of time, typically a one-month period for billing purposes. Customers are charged a rate per kWh of electricity used.

LCE – Lancaster Choice Energy - the CCA that serves the City of Lancaster, California.

LCFS – Low Carbon Fuel Standard – A CARB program designed to encourage the use of cleaner low-carbon fuels in California, encourage the production of those fuels, and therefore, reduce greenhouse gas emissions.

LCR – Local (RA) Capacity Requirements – The amount of Resource Adequacy capacity required to be demonstrated in a specific location or zone.

LMP – Locational Marginal Price – Each generator unit and load pocket is assigned a node in the CAISO optimization model. The model will assign a LMP to the node in both the day- ahead and real time market as it balances the system using the least cost. The LMP is comprised of three components: the marginal cost of energy, congestion and losses. The LMP is used to financially settle transactions in the CAISO.

LNBA – Locational Net Benefits Analysis - a cost-benefit analysis of distributed resources that incorporates location-specific net benefits to the electric grid.

Load - An end use device or customer that receives power from an energy delivery system. Load should not be confused with Demand, which is the measure of power that a load receives or requires. See Demand.

LSE – Load-serving Entity – Entities that have been granted authority by state, local law or regulation to serve their own load directly through wholesale energy purchases and have chosen to exercise that authority.

LTPP – Long-Term Procurement Rulemaking - This is an "umbrella" proceeding to consider, in an integrated fashion, all of the Commission's electric procurement policies and programs.

MCE – Marin Clean Energy - the first CCA in California that began serving customers in 2010. They serve customers in Contra Costa, Marin, Napa and Solano counties in Northern California.

MEO – Marketing Education and Outreach - a term generally used to describe various strategies to inform customers, such as to motivate consumers to take action on energy efficiency or conservation measures and change their behavior.

MW – Megawatt – measure of power. A megawatt equals 1,000 kilowatts or 1 million watts.

MWH – Megawatt-hour – measure of energy

NAESCO – National Association of Energy Service Companies - – an advocacy and accreditation organization for energy service companies (ESCOs). Energy Service Companies contract with private and public sector energy users to provide cost-effective energy efficiency retrofits across a wide spectrum of client facilities.

NBC – Non-Bypassable Charge - fees that are paid on every kilowatt-hour of electricity that is consumed from the grid. These charges can be used to fund things like energy assistance programs for low-income households and energy efficiency programs. These charges apply even if customers buy grid-supplied power from an outside power company such as a CCA.

NDA – Non-Disclosure Agreement - a contract by which one or more parties agree not to disclose confidential information that they have shared with each other.

NEM – Net Energy Metering – A program in which solar customers receive credit for excess electricity generated by solar panels.

NRDC – Natural Resources Defense Council - non-profit international environmental advocacy group.

NP-15 – North Path 15 – NP-15 is a CAISO pricing zone usually used to approximate wholesale electricity prices in northern California in PG&E's service territory.

OIR – Order Instituting Rulemaking - A procedural document that is issued by the CPUC to start a formal proceeding. A draft OIR is issued for comment by interested parties and made final by vote of the five Commissioners of the CPUC.

OSC – Order to Show Cause - order requiring an individual or entity to explain, justify, or prove something.

ORA – Office of Ratepayer Advocates - the independent consumer advocate within the CPUC, now called Public Advocates office.

PA – Program Administrator (for EE Business Plans) IOUs and local government agencies authorized to implement CPUC-directed Energy Efficiency programs.

PCE – Peninsula Clean Energy Authority - CCA serving San Mateo County and all 20 of its cities and towns as well as the City of Los Banos.

PCC1 – RPS Portfolio Content Category 1 – Bundled renewables where the energy and REC are dynamically scheduled into a California Balancing Authority (CBA) such as the CAISO. Also known as "in-state" renewables.

PCC2 – RPS Portfolio Content Category 2 – Bundled renewables where the energy and REC are from out-of-state and not dynamically scheduled to a CBA.

PCC3 – RPS Portfolio Content Category 3 – Unbundled REC

PCIA or "exit fee" - Power Charge Indifference Adjustment (PCIA) is an "exit fee" based on stranded costs of utility generation set by the California Public Utilities Commission. It is calculated annually and assessed to customers of CCAs and paid to the IOU that lost those customers as a result of the formation of a CCA.

PCL – Power Content Label – A user-friendly way of displaying information to California consumers about the energy resources used to generate the electricity they sell, as required by AB 162 (Statue of 2009) and Senate Bill 1305 (Statutes of 1997).

PD – Proposed Decision – A procedural document in a CPUC Rulemaking that is formally commented on by parties to the proceeding. A PD is a precursor to a final Decision voted on by the five Commissioners of the CPUC.

PG&E – Pacific Gas & Electric - the IOU that serves 16 million people over a 70,000 square mile service area in Northern California.

PHC – Prehearing Conference - CPUC hearing to discuss the scope of a proceeding among other matters. Interested stakeholders can request party status during these.

Pnode – Pricing Node – In the CAISO optimization model, it is a point where a physical injection or withdrawal of energy is modeled and for which a LMP is calculated.

PPA – Power Purchase Agreement – A contract used to purchase the energy, capacity and attributes from a renewable resource project.

PRP – Priority Review Project - transportation electrification pilot projects approved by the CPUC pursuant to SB 350.

PRRR – Progress on Residential Rate Reform – Pursuant to a CPUC decision, the IOUs must submit to the CPUC and parties periodic updates on the progress of their efforts to assist customers with residential rate design changes related to rate reform, including tier collapse and transition to a default time of use rate.

PUC – Public Utilities Code - California statute that contains 33 Divisions, and the range of topics within this Code includes natural gas restructuring, private energy producers, telecommunication services, and specific municipal utility districts and transit authorities. Primary statute for governance of utilities as well as CCAs in California.

PURPA – Public Utilities Regulatory Policy Act - federal statute passed by Congress to encourage fuel diversity via alternative energy sources and to introduce competition into the electric sector. It was meant to promote energy conservation (reduce demand) and promote greater use of domestic energy and renewable energy (increase supply). The law was created in response to the 1973 energy crisis.

RA – Resource Adequacy - Under its Resource Adequacy (RA) program, the California Public Utilities Commission (CPUC) requires load-serving entities—both independently owned utilities and electric service providers—to demonstrate in both monthly and annual filings that they have purchased capacity commitments of no less than 115% of their peak loads.

RAM – Renewables Auction Mechanism - a procurement program the Investor-owned Utilities (IOUs) may use to procure RPS eligible generation. The IOUs may use RAM to satisfy authorized procurement needs, for example, system Resource Adequacy needs, local Resource Adequacy needs, RPS needs, reliability needs, Local Capacity Requirements, Green Tariff Shared Renewables needs, and any need arising from Commission or legislative mandates.

RE – Renewable Energy - Energy from a source that is not depleted when used, such as wind or solar power.

REC - Renewable Energy Certificate - A REC is the property right to the environmental benefits associated with generating renewable electricity. For instance, homeowners who generate solar electricity are credited with 1 solar REC for every MWh of electricity they produce. Utilities obligated to fulfill an RPS requirement can purchase these RECs on the open market.

RES-BCT – Renewables Energy Self-Generation Bill Credit Transfer - This program enables local governments and universities to share generation credits from a system located on one government-owned property with billing accounts at other government-owned properties. The system size limit under RES-BCT is 5 MW, and bill credits are applied at the generation-only portion of a customer's retail rate.

RFO – Request for Offers a competitive procurement process used by organizations to solicit the submission of proposals from interested parties in response to a scope of services.

RPS - Renewable Portfolio Standard - Law that requires CA utilities and other load serving entities (including CCAs) to provide an escalating percentage of CA qualified renewable power (culminating at 33% by 2020) in their annual energy portfolio.

SB – Senate Bill - a piece of legislation that is introduced in the Senate. In other words, the Senate, rather than the Assembly, is the house of origin in the legislature for the legislation.

SCE – Southern California Edison - the large IOU that serves the Los Angeles and Orange County area.

SCP – Sonoma Clean Power Authority - CCA serving Sonoma County and surrounding areas in Northern California.

SDG&E – San Diego Gas & Electric - the IOU that serves San Diego county, they own the infrastructure that delivers SDCP energy to customers.

SGIP – Self-Generation Incentive Program – A program which provides incentives to support existing, new, and emerging distributed energy resources (storage, wind turbines, waste heat to power technologies, etc.)

SUE – Super User Electric - electric surcharge that's intended to penalize consumers for excessive energy use.

SVCE – Silicon Valley Clean Energy - CCA serving Silicon Valley Area.

TCR EPS Protocol – The Climate Registry Electric Power Sector Protocol – Online tools and resources provided by The Climate Registry to assist organizations to measure, report, and reduce carbon emissions.

TE – Transportation Electrification - For the transportation sector, electrification means replacing fossil fuels with electricity as the means of powering light-duty vehicles, medium- and heavy-duty trucks, and buses. The primary goal is to reduce greenhouse gas (GHG) emissions and, ultimately, contribute to mitigating the effects of climate change on the planet.

Time-of-Use (TOU) Rates — The pricing of delivered electricity based on the estimated cost of electricity during a particular time-block. Time-of-use rates are usually divided into three or four time-blocks per 24 hour period (on-peak, midpeak, off-peak and sometimes super off-peak) and by seasons of the year (summer and winter). Real time pricing differs from TOU rates in that it is based on actual (as opposed to forecasted) prices that may fluctuate many times a day and are weather sensitive, rather than varying with a fixed schedule.

TM – Tree Mortality - refers to the death of forest trees and provides a measure of forest health. In the context of energy, the CPUC is tasked with utilizing its authority to extend contracts and take actions to authorize new contracts on bioenergy facilities that receive feedstock from high hazard zones.

TURN – The Utility Reform Network - A ratepayer advocacy group charged with ensuring that California IOUs implement just and reasonable rates.

Unbundled RECs - Renewable energy certificates that verify a purchase of a MWH unit of renewable power where the actual power and the certificate are "unbundled" and sold to different buyers.

VPP – Virtual Power Plant – A cloud-based network that leverages an aggregation of distributed energy resources (DERs) to shift energy demand or provide services to the grid. For example, thousands of EV chargers could charge at a slower speed and hundreds of home batteries could discharge to the grid during a demand peak to significantly reduce the procurement of traditional supply resources.

VAMO – Voluntary Allocation, Market Offer - the process for SDG&E to allocate a proportional share of their renewable portfolio to SDCP and other LSEs within the service territory.