



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

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

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

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	



815 E Street, Suite 12716
San Diego, CA 92112
sdcommunitypower.org

September 29, 2021

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

SDCP Advice Letter 004-E

Re: SDCP'S REQUEST FOR ALLOCATION OF DAC-GT AND CSGT PROGRAM CAPACITY

Pursuant to California Public Utilities Commission ("Commission") Resolution E-4999, San Diego Community Power ("SDCP") hereby submits this advice letter ("AL") for approval to the Commission requesting its allocation of capacity under the Disadvantaged Community Green Tariff ("DAC-GT") and the Community Solar Green Tariff ("CSGT") programs as detailed below.

EFFECTIVE DATE

This AL is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to General Order 96-B Energy Industry Rule 5.2. SDCP respectfully requests that this submittal be effective on October 29, 2021, the 30th calendar day after the date submitted.

BACKGROUND

Assembly Bill ("AB") 327 directed the Commission to develop specific alternatives designed to promote the adoption of renewable generation in disadvantaged communities ("DACs"). Pursuant to this mandate, Decision ("D.")18-06-027, *Alternate Decision Adopting Alternatives to Promote Solar Distributed Generation in Disadvantaged Communities*, was issued on June 22, 2018, creating three new programs that specifically target DACs. The three programs include the DAC Single Family Solar Homes program, which provides up-front incentives for the installation of solar at low-income homes in DACs. The other two programs, the DAC-GT and the CSGT programs, are community solar programs that offer 100% solar energy to customers and provide a 20% discount on the electricity and delivery portion of the customers' bills.

Pursuant to D. 18-06-027, an 18 mega-watt ("MW") cap of DAC-GT program capacity and a 5 MW cap of CSGT program capacity was established for San Diego Gas & Electric's

(“SDG&E’s”) service area. Further, D. 18-06-027 authorized Community Choice Aggregators (“CCAs”) to develop and implement their own DAC-GT and CSGT programs.¹

Commission Resolution E-4999, issued June 3, 2019, reserved both DAC-GT and CSGT program capacity for *then-existing*² CCAs based on the proportional share of residential customers in DACs that each CCA serves and decreased each investor-owned utilities’ (“IOUs”) program capacity caps by the amount allocated to CCAs in their service area.³ When Resolution E-4999 made allocations to CCA programs for DAC-GT and CSGT capacity, SDCP was not yet in existence.⁴ Since no CCAs serving residential customers in DACs were in existence in SDG&E’s service area at that time, all 18 MW of DAC-GT program capacity and 5 MW of CSGT program capacity was allocated to SDG&E.⁵ The following year, on March 9, 2020, the Commission certified SDCP as a CCA program and SDCP began serving customer load in SDG&E’s service area in March 2021.⁶ SDCP is currently in Phase 2 of its three-phase rollout and expects to complete Phase 3 by May 2022.

According to SDGE’s February 1, 2021, AL 3682-E, no contracts between SDG&E and DAC-GT or CSGT project developers have been executed.⁷ Due to the lack of projects, SDG&E will not enroll any customers in either program in 2021. A March 2021 data request from Energy Division to SDG&E reveals SDCP is estimated to serve 42,876 out of the total 53,628 of active residential customers in DACs within SDG&E’s service area over the following twelve months. Using the same methodology adopted in Resolution E-4999, SDCP calculated its allocation of DAC-GT and CSGT program capacity to be 14.39 MW and 4 MW, respectively.

On August 11, 2021, SDCP and SDG&E held a meeting to confirm the appropriate allocation of SDCP’s proportional share of program capacity for both DAC-GT and CSGT under the methodology used in Resolution E-4999. SDG&E agrees with the above capacity calculations of 14.39 MW for DAC-GT and 4 MW for CSGT to be allocated to SDCP.

PURPOSE

SDCP is filing this Tier 2 AL to request its allocation of capacity within SDG&E’s service area under both DAC-GT and CSGT programs pursuant to Resolution E-4999’s methodology. SDCP plans a two-step approach for SDCP to obtain Commission approval for both programs. First, SDCP will request its proportional share of DAC-GT and CSGT program capacity (“Allocation AL”). SDCP intends for the instant AL to be the Allocation AL. Second, after

¹ See D. 18-06-027 at 104 (Ordering Paragraph 17).

² Allocations were only made to existing CCAs in both Pacific Gas & Electric Company’s and Southern California Edison Company’s service areas. See Resolution E-4999 at 13-14.

³ Resolution E-4999 at 13.

⁴ *Id.* at 14.

⁵ *Id.*

⁶ See *Letter Certifying San Diego Community Power’s Implementation Plan and Statement of Intent*, California Public Utilities Commission, March 9, 2020.

⁷ SDG&E AL 3682-E, SDG&E AL 3682-E, *San Diego Gas & Electric Updated Program Budget Estimates and Marketing Education and Outreach Plans in Regard to Disadvantaged Communities Green Tariff and Community Solar Green Tariff Pursuant to Resolution E-4999*, at 2, February 1, 2021.

receiving Commission approval of this Allocation AL, SDCP will file its second AL, which will contain all the documents required under D. 18-06-027 for the implementation of the DAC-GT and CSGT programs (“Implementation AL”). SDCP anticipates filing the Implementation AL as soon as reasonably practicable following approval of the Allocation AL; the Implementation AL will outline the proposed mechanics for program years 2022 and 2023. With a potential update to CalEnviroScreen⁸ and the potential addition of National City⁹ and San Diego County¹⁰ as members to SDCP, SDCP anticipates that there may be the need for an interim AL prior to filing the Implementation AL that incorporates any changes to DACs served by SDCP and SDCP’s capacity allocations.

SDCP respectfully requests that the Commission approve SDCP’s allocation request for 14.39 MW of DAC-GT program capacity and 4 MW of CSGT program capacity, pursuant to Resolution E-4999’s methodology.

CONCLUSION

SDCP respectfully requests that the Commission approve SDCP’s capacity allocation request for the DAC-GT and CSGT programs proposed herein by SDCP and pursuant to the allocation methodology provided for in Resolution E-4999.

NOTICE

A copy of this submittal has been served on the official Commission service lists for R. 14-07-002. For changes to this service list, please contact the Commission’s Process Office at (415) 703-2021 or by electronic mail at process_office@cpuc.ca.gov.

PROTESTS

Anyone wishing to protest this AL filing may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this AL filing. Protests should be mailed to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue

⁸ See *Draft CalEnviroScreen 4.0 Report*, California Office of Environmental Health Hazard Assessment, February 2021.

(<https://oehha.ca.gov/media/downloads/calenviroscreen/document/calenviroscreen40reportd12021.pdf>)

⁹ See *Resolution of the City Council of the City of National City, 1) acknowledging the Preliminary Update of Climate Action Plan and; 2) directing staff to return to City Council with a CCA ordinance and Joint Powers Agency agreement with San Diego Community Power*, Agenda of a Regular Meeting – National City City Council, Agenda Item No. 22, September 21, 2021.

(<https://www.nationalcityca.gov/home/showpublisheddocument/27273/637674080054070000>)

¹⁰ See *Authorization to Join Community Choice Energy Joint Powers Authority and Take Related Actions*, County of San Diego Board of Supervisors, Minute Order No. 11, August 31, 2021.

(<https://bosagenda.sandiegocounty.gov/cob/cosd/cob/doc?id=0901127e80d885dc>)

San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov


Copies should also be mailed to the attention of the Deputy Executive Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this AL should be sent by letter or transmitted electronically to the attention of:

Laura Fernandez
Director of Regulatory and Legislative Affairs
San Diego Community Power
815 E Street
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Regulatory Counsel for San Diego Community Power
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(858) 704-4709
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There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

By:  _____

Dated: September 29, 2021

Laura Fernandez
Director of Regulatory and Legislative Affairs
San Diego Community Power
815 E Street
Suite 12716
San Diego, California 92112
lfernandez@sdcommunitypower.org

cc: Service List: R.14-07-002