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July 21, 2021

Sent Via Email

Ed Randolph
Deputy Executive Director, Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Revisions to San Diego Community Power's Implementation Plan

Dear Mr. Randolph,

The purpose of this letter is to notify the California Public Utilities Commission (Commission) that San Diego Community Power (SDCP) has amended Phase 3 of its customer enrollment schedule, delaying enrollment of residential customers from November 2021 until early 2022. SDCP has revised its Implementation Plan and Statement of Intent (Implementation Plan) to reflect the change in schedule, as further described below.

Background

SDCP filed an Implementation Plan in December 2019, and the Commission certified it by letter on March 9, 2020. As described in the original Implementation Plan, SDCP's customer enrollment included three phases:

Phase 1 (March 2021) – all municipal accounts and potentially some large commercial accounts to ensure adequate revenues for subsequent phases;

Phase 2 (July 2021) – remaining commercial, industrial, agriculture, street lighting, and traffic control accounts; and

Phase 3 (November 2021) – all residential accounts and any remaining service accounts that may have been omitted during Phase 2.

Subsequently, to better serve operational needs, SDCP's Board of Directors (Board) amended Phase 3 of the enrollment schedule at its regular meeting on April 22, 2021. SDCP had previously notified SDG&E about this change, as part of regular and frequent discussions related to CCA operations, which have also included issues such as customer enrollment, load forecasts and the timing of SDG&E's billing system upgrade. Formal correspondence regarding the change was also directed to SDG&E on June 22, 2021.



The changes to **Phase 3** enrollment are as follows:

- (1) February 1, 2022: Residential and lighting accounts within Imperial Beach
- (2) March 1, 2022: Residential and lighting accounts within La Mesa
- (3) April 1, 2022: Residential and lighting accounts within Encinitas
- (4) May 1, 2022: Residential and lighting accounts within Chula Vista and San Diego

Corresponding revisions to SDCP's Implementation Plan are described below.

Revisions to Implementation Plan

Due to the change in customer enrollment, certain information in SDCP's Implementation Plan is now outdated and needs to be updated. The following content reflects the changes that were made to the enrollment schedule and is intended to replace content that appeared in SDCP's original Implementation Plan:

Table 2 (Revised): SDCP Proposed Resource Plan (GWh), 2020-2029

SDCP Demand	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Retail Demand	2,141	5,197	6,081	6,111	6,142	6,172	6,203	6,234	6,265	6,297
Losses and UFE	6%	6%	6%	6%	6%	6%	6%	6%	6%	6%
Total Demand	2,269	5,509	6,446	6,478	6,510	6,543	6,575	6,608	6,641	6,675

Note that supply figures, presented in Rows 5-9 of Table 2 have also changed based on amendments to the enrollment schedule, resource and procurement policies, and other factors.

Table 3 (Revised): SDCP Enrolled Retail Service Accounts By Phase-In Period

SDCP Customers	Phase 1 (3/2021)	Phase 2 (6/2021)	Phase 3 (2/2022-6/2022)	Grand Total
Agricultural	2	259	11	272
Industrial	0	11	1	12



Large Commercial	467	6,414	663	7,544
Lighting	8	1,767	1,776	3,551
Residential	6	9	696,534	696,549
Small Commercial	123	61,908	1,089	63,120
Grand Total	606	70,368	700,074	771,048

Note that Phase 1 and 2 figures represent enrolled accounts.

Table 4 (Revised): SDCP Retail Service Accounts (End of Year), 2020-2029

SDCP Customers	2022	2023	2024	2025	2026	2027	2028	2029	2030
Agricultural	272	274	276	278	280	282	284	287	289
Industrial	12	12	12	12	12	12	13	13	13
Large Commercial	7,544	7,601	7,658	7,715	7,773	7,831	7,890	7,949	8,009
Lighting	3,551	3,578	3,604	3,631	3,659	3,686	3,714	3,742	3,770
Residential	696,549	701,773	707,036	712,339	717,682	723,064	728,487	733,951	739,456
Small Commercial	63,120	63,593	64,070	64,551	65,035	65,523	66,014	66,509	67,008
Grand Total	771,048	776,831	782,657	788,527	794,441	800,399	806,402	812,450	818,544

*Assumes annual growth rate of 0.75% across all customer classes.

Table 5 (Revised): SDCP Annual Energy Requirements (GWh), 2020-2029

	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Retail Demand	2,141	5,197	6,081	6,111	6,142	6,172	6,203	6,234	6,265	6,297
Losses and UFE	6%	6%	6%	6%	6%	6%	6%	6%	6%	6%
Total Demand	2,269	5,509	6,446	6,478	6,510	6,543	6,575	6,608	6,641	6,675

As a result of changes to the enrollment schedule, a number of other relatively minor changes have been made to the Implementation Plan:

- Page 14 (Flow Chart) – Phase 3 enrollment will now occur between February and May, 2022.
- Page 17 (Description) – The description of SDCP’s customer enrollment schedule in the last paragraph on page 17 of the Implementation Plan is revised as follows:

Original Language

Phase 3 of the Program will commence following successful implementation of Phase 2 enrollments over an approximate 4-month term, which corresponds with an expected Phase 3 service commencement occurring on or about November 1, 2021. It is anticipated that approximately 670,000 additional customers, comprised of residential accounts and any remaining service accounts that may have been omitted during Phase 2 will be included in Phase 3, with annual energy consumption approximating 2,700 GWh, or 37 percent of SDCP’s total prospective customer load.

New Language

Phase 3 of the Program will commence following successful implementation of Phase 2 enrollments, which corresponds with an expected Phase 3 service commencement occurring on or about February 1, 2022, and concluding on or about May 31, 2022. It is anticipated that approximately 700,074 additional customers, comprised of residential accounts and any remaining service accounts that may have been omitted during Phase 2, will be included in Phase 3, with annual energy consumption approximating 2,936 GWh, or 46 percent of SDCP’s total potential customer load.

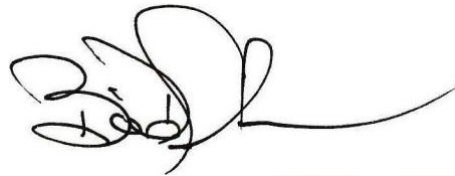
- Page 21 (Phase 3 Description) – Phase 3 enrollment will now occur between February and May 2022.



- Page 24 (Capacity Requirements) – Capacity requirements have changed as a result of changes to the enrollment schedule and were reported to the CPUC in SDCP’s Resource Adequacy (RA) Year Ahead Filing submitted in April 2021.

Conclusion

Please do not hesitate to contact me at bcarnahan@sdcommunitypower.org if you have any questions about these changes.



**Bill Carnahan, Interim CEO
San Diego Community Power**

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