



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: San Diego Community Power

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Samir Hafez

Phone #: 858.571.6935

E-mail: samir@tosdalapc.com

E-mail Disposition Notice to: samir@tosdalapc.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

March 29, 2022

Advice Letter (AL) #: 9-E

Tier Designation: 2

Subject of AL: SAN DIEGO COMMUNITY POWER's 2020 INTEGRATED RESOURCE PLAN DEFICIENCY REMEDY

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 #: D. 22-02-004

Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: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: 4/28/22

No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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: N/A

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: N/A

<sup>1</sup>Discuss in AL if more space is needed.

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

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

Name: Laura Fernandez  
Title: Director of Regulatory and Legislative Affairs  
Utility Name: San Diego Community Power  
Address: 815 E Street, Suite 12716  
City: San Diego  
State: California Zip: 92112  
Telephone (xxx) xxx-xxxx: 619 657-0406  
Facsimile (xxx) xxx-xxxx:  
Email: [lfernandez@sdcommunitypower.org](mailto:lfernandez@sdcommunitypower.org)

Name: Samir Hafez  
Title: Regulatory Counsel  
Utility Name: San Diego Community Power  
Address: 845 15th St, Suite 103  
City: San Diego  
State: California Zip: 92101  
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Email: [samir@tosdalapc.com](mailto:samir@tosdalapc.com)

## 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

March 29, 2022

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

**San Diego Community Power Advice Letter 9-E**

**Re: SAN DIEGO COMMUNITY POWER'S 2020 INTEGRATED RESOURCE PLAN DEFICIENCY REMEDY**

In accordance with Ordering Paragraph (“OP”) 4 of the California Public Utilities Commission’s (“Commission”) Decision (“D.”) 22-02-004<sup>1</sup>, San Diego Community Power (“SDCP”) respectfully submits this Tier 2 Advice Letter (“AL”).

**PURPOSE**

D. 22-02-004 requires SDCP to submit this Tier 2 AL providing, “at minimum, an appendix or supplement” to its 2020 Integrated Resource Plan (“IRP”) addressing the following deficient items:

- **Focus on Disadvantaged Communities:** Provide specific details on activities to address disadvantaged communities, as required by Section 3d of the Narrative Template, specifying what current and planned activities/programs, if any, address disadvantaged communities, and describe how its actions and engagement have changed over time.
- **Proposed Activities Specific to Disadvantaged Communities:** Provide specific details on planned activities to conduct outreach and seek input from disadvantaged communities that could be impacted by procurement resulting from the implementation of the 38 MMT Plan, as well as any activities to minimize criteria air pollutants, with priority on disadvantaged communities and activities targeted at identifying feasible procurement opportunities to reduce reliance on fossil-fueled power plants, particularly those located within disadvantaged communities, as required by section 4a of the Narrative Template.

In adherence with the resubmission requirements described above, this AL contains supplemental narrative descriptions of SDCP’s efforts to address and engage with disadvantaged communities.

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<sup>1</sup> D. 22-02-004, *Adopting 2021 Preferred System Plan*, Rulemaking (“R.”) 20-05-003, February 15, 2022.

## **BACKGROUND**

Pursuant to Senate Bill (“SB”) 350, the Commission issued D. 18-02-018 on February 13, 2018, to set IRP filing requirements for load serving entities (“LSEs”) and adopted a two-year planning cycle to set greenhouse gas (“GHG”) emission targets, conduct modeling analysis, and approve or certify IRPs filed by LSEs. The Commission subsequently updated the filing requirements in D.20-03-028 and directed LSEs to file their 2020 IRPs on September 1, 2020. LSEs were directed to file narrative templates, resource data templates, and Clean System Power calculators.

In D. 22-02-004, the Commission evaluated the individual 2020 IRP filings of all LSEs under the Commission’s IRP purview and determined whether LSEs’ IRPs were approved, certified or exempt, or not yet approved or certified. For those IRPs that are not yet approved or certified, the Commission requires LSEs to file a Tier 2 AL no later than April 1, 2022, providing, at a minimum, an appendix or supplement to its IRP, with the missing or inadequate information from the September 2020 and/or October 2021 versions.<sup>2</sup>

In a table on pages 40 and 41 of D. 22-02-004, the Commission indicates that SDCP’s IRP was deficient in addressing the following two requirements: “Focus on disadvantaged communities” and “Proposed activities specific to disadvantaged communities.” To address these deficient items, the Commission requires SDCP’s resubmission to provide specific details on current and planned activities focused on engaging and seeking input from disadvantaged communities.<sup>3</sup>

SDCP largely attributes deficiencies identified above to the fact that it was relatively new at the time of its IRP submission and did not yet have sufficient opportunity or resources to fully address the deficient items. SDCP is a community choice aggregation (“CCA”) program that formed in 2019 and first began rolling out service to customers in the Cities of Chula Vista, Encinitas, Imperial Beach, La Mesa and San Diego on March 1, 2021. Over the last several months, SDCP has taken considerable steps towards engaging disadvantaged communities and seeking input from these communities to help inform and develop programs and procurement goals that best serve the needs of its customers while supporting regional sustainability efforts.

## **FOCUS ON DISADVANTAGED COMMUNITIES UPDATE**

In accordance with D. 22-02-004, SDCP provides specific details on activities to address disadvantaged communities, as required by Section 3d of the Narrative Template. Specifically, SDCP provides the supplemental narrative description of its current and planned activities and programs addressing disadvantaged communities.

On September 29, 2021, SDCP filed its Tier 2 AL with the Commission requesting a capacity transfer from SDG&E under the Disadvantaged Communities (“DACs”) Green

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<sup>2</sup> D. 21-02-004 at 19.

<sup>3</sup> *Id.* at 41.

Tariff (“DAC-GT”) and Community Solar Green Tariff (“CSGT”) based on the disadvantaged communities located within the cities of SDCP’s founding member agencies.<sup>4</sup> The Commission accepted and approved SDCP’s capacity transfer request on October 29, 2021. SDCP will now develop an implementation advice letter seeking approval of proposed programs and obtaining the status of a program administrator. SDCP will also seek additional capacity transfer from disadvantaged communities located in National City, a new member city that was added to SDCP’s joint powers authority (“JPA”) after SDCP submitted AL 4-E.

The DAC-GT program allows customers who reside within a disadvantaged community and are eligible for the California Alternate Rates for Energy (“CARE”) / Family Electric Rate Assistance Program (“FERA”) program to receive 100% solar energy at a 20% discount on the electricity and delivery portion of their otherwise applicable tariff. The CSGT program is similar but differs where at least one community sponsor is needed to represent the local generating resource, as it must be located in a disadvantaged community and within 5 miles of the disadvantaged community where subscribing customers reside. Moreover, the CSGT program requires the sponsor to promote workforce development for the new build project. Both programs incentivize the development of new, local generation and will require extensive community engagement to educate and subscribe customers.

SDCP is also developing a strategic program plan, called the Community Power Plan (“CPP”), which will provide a decision-making framework to guide SDCP’s program strategy, and selection and development of local programs based on community needs and gaps in program offerings for which SDCP could invest as it matures as an agency. As part of the development of the CPP, SDCP will conduct a community needs assessment, partnering with local Community Based Organizations (“CBOs”) to assist in community engagement. SDCP will utilize multiple engagement methods, such as listening sessions, survey instruments, interviews, attendance at community events, and workshops, to gather input from a large cross section of its residents.

SDCP issued a Request for Proposals (“RFP”) in November 2021 looking for firms to conduct a community needs assessment and develop the Community Power Plan. Four proposals were received in December 2021. With the assistance of two representatives from SDCP’s Community Advisory Committee (“CAC”), one firm with strong experience in community engagement and development of a similar plan for another CCA was selected.

As of March 2022, SDCP has developed a preliminary scope of work that will include listening sessions with CBOs to hear the perspectives of communities of concern regarding community needs, challenges, and gaps in programs offering. A Community Survey will be developed to gather additional input and be shared with CBOs, trusted community ambassadors, and member agencies to distribute to their own networks, as well as promoted through paid social media ads and at community events. Additionally, SDCP will host

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<sup>4</sup> SDCP AL 4-E, *SDCP’s Request for Allocation of DAC-GT and CSGT Program Capacity*, September 29, 2021.

Community Goal Setting Workshops to further understand the priorities and needs of the community to inform the types of programs SDCP can launch. The CPP will include a market assessment of existing programs and program delivery mechanisms to understand the universe of programs available for implementation. The final CPP will illustrate the opportunities related to addressing the needs of SDCP's Communities of Concern and will recommend an initial five-year program suite. Before adoption, SDCP will solicit feedback and input from the community on the draft plan to ensure proper alignment.

Ultimately the CPP will allow SDCP to successfully deliver programs that, per its JPA, are centered around equity, and best serve the needs of its local communities while supporting regional sustainability efforts.

### **PROPOSED ACTIVITIES SPECIFIC TO DISADVANTAGED COMMUNITIES UPDATE**

Pursuant to D. 22-02-004, SDCP provides specific details on planned activities to conduct outreach and seek input from disadvantaged communities, as well as any activities to minimize criteria air pollutants, with priority on disadvantaged communities and activities targeted at identifying feasible procurement opportunities to reduce reliance on fossil-fueled power plants, particularly those located within disadvantaged communities, as required by section 4a of the Narrative Template. Specifically, SDCP provides the following proposed activities in addition to the key activities listed under Section 4a of its IRP:

- a) Launch of a Feed-In Tariff program that provides additional bonus incentive pricing for projects that are located within a disadvantaged community/Community of Concern.
- b) Conduct a community needs assessment in partnership with CBOs, especially with those serving residents in disadvantaged communities, to solicit input on community needs and priorities regarding energy and sustainability.
  - Host public listening sessions with CBOs.
  - Develop a community survey.
  - Work with interest-community groups already organized around populations of focus.
  - Conduct community Goal Setting Workshops with the public, SDCP member agencies, SDCP's Community Advisory Council, and SDCP's Board of Directors.
- c) Utilize the community needs assessment to develop a Community Power Plan that will guide SDCP's development of programs and program strategies centering on equity.
  - Solicit feedback from stakeholders during development of the plan.

- Solicit feedback and comments on a draft Community Power Plan before Board adoption.
- d) Pursuit of capacity allocation and development of an implementation advice letter for subsequent approval of the CPUC-funded DAC-GT and CSGT programs and implementation of those programs.

### **TIER DESIGNATION**

Pursuant to D. 22-02-004, this AL is submitted with a Tier 2 Designation.

### **EFFECTIVE DATE**

SDCP requests that this Tier 2 AL become effective on April 28, which is 30 days after filing.

### **PROTESTS**

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

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

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

Samir Hafez  
Regulatory Counsel for SDCP  
Tosdal, APC  
845 15<sup>th</sup> Street, Suite 103  
San Diego, CA 92101

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.

### **NOTICE**

In accordance with General Rule 4 of GO 96-B, SDCP is serving copies of this AL to the interested parties shown on the R. 20-05-003 service list.

Pursuant to the March 20, 2020 order from Executive Director waiving the hard copy filing requirements for the AL pursuant to GO 96-B Rule 1.3, SDCP will not be filing a



hard copy of this AL. For changes to these service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

Dated: March 29, 2022

By,

*/s/ Laura Fernandez*

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Laura Fernandez  
Director of Legislative and Regulatory Affairs  
San Diego Community Power  
815 E Street, Suite 12716  
San Diego, CA 92112

cc: R. 20-05-003 Service List