



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: San Diego Community Power ("SDCP")

Utility type:

☒ ELC ☐ GAS ☐ WATER  
☐ PLC ☐ HEAT

Contact Person: Stephen Gunther

Phone #: (619) 657-0419

E-mail: [sgunther@sdcommunitypower.org](mailto:sgunther@sdcommunitypower.org)

E-mail Disposition Notice to: [sgunther@sdcommunitypower.org](mailto:sgunther@sdcommunitypower.org)

### EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

September 27, 2024

Advice Letter (AL) #: 24-E

Tier Designation: 2

Subject of AL: San Diego Community Power's Disadvantaged Communities Green Tariff  
Updates Pursuant to Decision 24-05-065

Keywords (choose from CPUC listing): Compliance, Tariffs

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:  
D.24-05-065

Does AL replace a withdrawn or rejected AL?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

Summarize differences between the AL and the prior withdrawn or rejected AL: n/a

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information: n/a

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: 10/27/24

No. of tariff sheets: 1

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: See Advice Letter

Service affected and changes proposed<sup>1</sup>: See Advice Letter

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: Stephen Gunther  
Title: Regulatory Manager  
Utility Name: San Diego Community Power  
Address: PO Box 12716  
City: San Diego  
State: California Zip: 92112  
Telephone (xxx) xxx-xxxx: (619) 657-0419  
Facsimile (xxx) xxx-xxxx: n/a  
Email: [sgunther@sdcommunitypower.org](mailto:sgunther@sdcommunitypower.org)

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

## ENERGY Advice Letter Keywords

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

September 27, 2024

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

SDCP Advice Letter 24-E

**RE: San Diego Community Power's Disadvantaged Communities Green Tariff Updates  
Pursuant to Decision 24-05-065**

Pursuant to California Public Utilities Commission's ("Commission") Decision ("D.") 24-05-065<sup>1</sup>, San Diego Community Power ("SDCP") respectfully submits this Advice Letter ("AL") for approval, which details the following updates to its Disadvantaged Communities Green Tariff ("DAC-GT") program. The revised tariff is attached hereto as Appendix A and redlined as Appendix B.

**TIER DESIGNATION**

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.2, and D.24-05-065, this AL is submitted with a Tier 2 designation.

**EFFECTIVE DATE**

This AL will become effective on October 27, 2024, which is 30 days following submission.

**BACKGROUND**

SDCP is a California Joint Powers Authority formed on October 1, 2019 by the founding cities of Chula Vista, Encinitas, La Mesa, Imperial Beach, and San Diego for the purpose of implementing a Community Choice Aggregation ("CCA") program. The Commission certified SDCP's CCA Implementation Plan on March 9, 2020. SDCP started serving customers in the five cities starting in March 2021 for municipal accounts, and in June 2021 for commercial and industrial accounts. Residential customers were enrolled using a phased-in approach, starting with Imperial Beach in February 2022, followed by La Mesa in March 2022, Encinitas in April 2022, and concluding with Chula Vista and San Diego in May 2022. The SDCP Board of Directors subsequently voted to accept the unincorporated communities of San Diego County and the city of National City. On February 28, 2022, the Commission certified Addendum #1 to SDCP's Implementation Plan, adding these two new member jurisdictions. Enrollment of these accounts was completed in 2023, increasing SDCP's total number of customer accounts to approximately 960,000.

On June 21, 2018, the Commission issued D.18-06-027 adopting new programs to promote the installation of renewable generation among residential customers in Disadvantaged Communities

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<sup>1</sup> CPUC Decision 24-05-065 at 170-171 (Ordering Paragraph ("OP") 3) and 173-174 (OP 9).

(“DACs”), as directed by the California Legislature in Assembly Bill 327 (Perea), Stats. 2013, Ch. 611. Pursuant to D.18-06-027, CCAs may develop and implement their own DAC-GT and Community Solar Green Tariff (“CSGT”) programs. CCA programs must abide by all DAC-GT or CSGT rules and requirements adopted in D. 18-06-027. D. 18-06-027 provides that CCAs must file a Tier 3 advice letter to implement the CCA DAC-GT and CSGT programs and allows CCAs to combine DAC-GT and CSGT proposals into one Tier 3 advice letter. Resolution E-4999 further stipulates that such advice letters must be filed on or before January 1, 2021 or the capacity allocated to the CCA will be reverted to an IOU or another CCA. Moreover, Resolution E-4999 stated that should a new CCA be launched after January 1, 2021, as is the case with SDCP, the issue of new program implementation would be addressed in a future application for review. Accordingly, SDCP filed its Tier 3 Implementation Advice Letter on October 12, 2022, to create DAC-GT and CSGT programs consistent with all provisions in D.18-06-027, D.18-10-007, Resolution E-4999, and guidance received from the Commission’s Energy Division.

Subsequently, the Commission approved, with modifications, SDCP’s DAC-GT and CSGT programs by issuing Resolution E-5246 on March 20, 2023. Accordingly, SDCP submitted supplemental AL 10-E-A on April 19, 2023, to address the required tariff modifications.

On June 6, 2024, the Commission issued D. 24-05-065 discontinuing CSGT, transferring all remaining un-procured capacity assigned to the CSGT tariff to the DAC-GT program, and making several modifications to the DAC-GT program.<sup>2</sup> As such, OP 9 ordered the investor-owned utilities (“IOU”) and participating CCAs to each submit a Tier 2 Advice Letter updating their program tariffs according to OP 2 and OP 3. Per OP 9, SDCP participated in a meeting held on August 20, 2024, with the Program Administrators, consisting of the IOUs and participating CCAs. The Program Administrators met to coordinate and, to the extent possible, ensure DAC-GT/CSGT tariff uniformity across the state. Following the meeting, the Program Administrators continued to communicate via email on planned DAC-GT/CSGT tariff updates prior to the submission of their respective Advice Letters.

## **SUMMARY OF TARIFF CHANGES**

### **Electric Schedule DAC-GT, *Disadvantaged Communities Green Tariff Program***

#### **1) Project Siting Changes**

In compliance with OP 3 (a) of D.24-05-065, SDCP proposes to add the following language to revise the project siting eligibility in the Applicability section of the DAC-GT tariff sheet (additions in underline and deletions in strikethrough):

...that are located within or no more than five miles from a DAC in San Diego Gas and Electric’s (“SDG&E”) IOU service territory...

#### **2) Inclusion of Voluntary Storage**

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<sup>2</sup> CPUC D.24-05-056 at OP 2 and 3.

In compliance with OP 3 (g) of D. 24-05-065, SDCP proposes to add the following language to permit the voluntary inclusion of storage in the Applicability section of the DAC-GT tariff sheet:

Qualified Facilities are defined as new Renewable Portfolio Standard (“RPS”) eligible generating facilities, and RPS-eligible generating facilities paired with storage, with a nameplate rated generating capacity between 500 kW to 20 MW...

### **3) Removal of References to CSGT**

In compliance with OP 2 of D. 24-05-065, which discontinued CSGT, SDCP proposes to remove all references to the CSGT program throughout the DAC-GT tariff sheet.

### **4) Other Changes**

SDCP proposes taking the opportunity of updating its DAC-GT tariff sheet to update language for consistency.

- a) Per SDCP branding guidelines, SDCP proposes replacing “SDCP” with “SD Community Power” throughout the DAC-GT tariff sheet.

## **APPENDICES**

Appendix A: Electric Schedule DAC-GT, Disadvantaged Communities Green Tariff Program

Appendix B: Electric Schedule DAC-GT, Disadvantaged Communities Green Tariff Program (Redlined)

## **CONCLUSION**

SDCE respectfully requests that the Commission approve its updated DAC-GT tariff in accordance with the attached appendices.

## **PROTEST**

Anyone wishing to protest this advice filing may do so electronically no later than 20 days after the date of this advice filing. Protests should be submitted to:

CPUC, Energy Division  
Attention: Tariff Unit  
E-mail: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above). In addition, protests and all other correspondence regarding this Advice Letter should also be sent electronically to the attention of:

Stephen Gunther

Regulatory Manager  
San Diego Community Power  
sgunther@sdcommunitypower.org

There are no restrictions on who may file a protest, but the protest shall meet the requirements of General Order 96-B, and specifically set forth the grounds upon which it is based and shall be submitted expeditiously.

## NOTICE

In accordance with General Order 96-B, General Rule 7.2, a copy of this advice letter is being sent electronically to the parties on the service lists for R.22-05-022. For changes to this service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov.

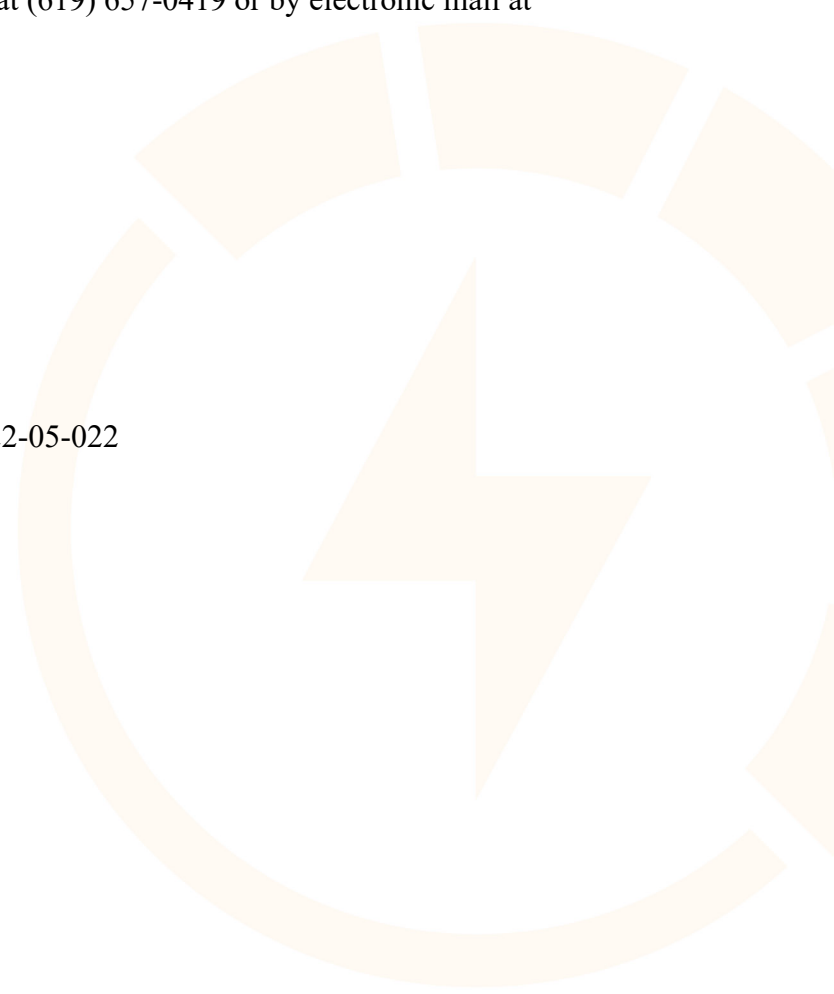
## CORRESPONDENCE

For questions, please contact Stephen Gunther at (619) 657-0419 or by electronic mail at sgunther@sdcommunitypower.org.

*/s/ Stephen Gunther*

Stephen Gunther  
Regulatory Manager  
San Diego Community Power

cc: Service Lists: R.14-07-002, A.22-05-022



## **APPENDIX A**





## Electric Schedule DAC-GT, Disadvantaged Communities Green Tariff Program

*Effective Date: October 27, 2024*



## **San Diego Community Power Disadvantaged Communities Green Tariff Program**

The purpose of the DAC-GT program is to provide eligible customers residing in disadvantaged communities (“DACs”) as defined in the Terms and Conditions below with a bill credit while also having their usage met with up to 100% renewable energy from qualified renewable generating facilities in DACs (“Qualified Facilities”).

### **APPLICABILITY**

This program is available to residential San Diego Community Power (“SD Community Power”) customers who are eligible for the California Alternate Rates for Energy (“CARE”) or Family Electric Rate Assistance (“FERA”) program and reside within a DAC.

Qualified Facilities are defined as new Renewable Portfolio Standard (RPS) eligible generating facilities, and RPS-eligible generating facilities paired with storage, with a nameplate rated generating capacity between 500 kW to 20 MW that are located within or no more than five miles from a DAC in San Diego Gas and Electric’s (“SDG&E”) IOU service territory and that supply energy to SD Community Power via a Power Purchase Agreement for the purposes of meeting customer subscriptions under this program.

This program will auto-enroll customers based on a criterion specified in the Terms and Conditions below. Once SD Community Power reaches its DAC-GT program cap, a waitlist will be maintained for new subscriptions. When program capacity becomes available, SD Community Power will enroll customers based on the criteria specific.

This program is not available to customers served under standby service, master-metered schedules, non-CARE/FERA eligible rates, Net Energy Metering rates, non-residential rates, Direct Access customers or SDG&E bundled customers.

### **RATES AND CREDITS**

Customers taking service on this rate schedule will receive a 20% discount on the electric portion of the bill compared to their otherwise applicable tariff (“OAT”), including SD Community Power generation charges, SDG&E transmission and distribution charges, and SDG&E CCA PCIA charges. The discount will be applied prior to the application of state and local taxes. This discount applies so long as customers are enrolled under the program and compliant with all the eligibility and enrollment terms.

For low-income customers enrolled in the CARE and/or FERA programs, the OAT is the customer’s existing rate schedule before program enrollment. Residential customer Service Delivery Points that are already enrolled in SD Community Power’s 100% renewable energy generation service option when enrolling under the program will default to SD Community Power’s base rate for the purposes of calculating the 20% discount.

## TERMS AND CONDITIONS

1. **Customer eligibility.** To enroll in this program customers must meet the following eligibility criteria:
  - a. **SD Community Power enrollment:** Program participants must be residential SD Community Power customers. SDG&E bundled customers and customers served by Direct Access providers are not eligible to participate in this program.
  - b. **CARE/FERA Eligibility:** Customers must be eligible for the CARE or FERA program. If a customer is not already enrolled in CARE or FERA they may enroll in CARE or FERA via the Investor-Owned Utility. Since SD Community Power plans to auto-enroll residents into the DAC-GT program who are already enrolled in CARE or FERA, customers who are found to be eligible but not enrolled yet into the aforementioned programs will be encouraged to enroll and subsequently added to the program if capacity allows or add them to the end of the waiting list.
  - c. **Disadvantaged community:** The customer's service address must be located in a DAC, identified by the CalEnviroScreen 4.0 as scoring among the top 25% of census tracts statewide, or census tracts scoring in the highest 5% of the CalEnviroScreen's Pollution Burden, but do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data. In the event the census tract in which a customer resides is not scored as a top 25% DAC in a subsequent version of the CalEnviroScreen tool or as one of the census tracts in the top 5% of pollution burden, the customer may retain their eligibility for DAC-GT.
2. **Ineligible rates.** Customers served under the following rate schedules cannot concurrently participate in DAC-GT:
  - a. IOU bundled service;
  - b. Direct Access customers;
  - c. Standby service;
  - d. Non-metered service;
  - e. Net Energy Metering schedules;
  - f. Other 100% renewable energy rates including SD Community Power's 100% Power100 rate;
  - g. Customers served under a master-meter rate schedule;
  - h. Non-CARE/FERA eligible rates; and
  - i. Non-residential rate schedules.
3. **Customer enrollment and term.** After resources have been procured and brought online, service under this program will become effective within two billing periods after SD Community Power has identified the eligible customers to auto-enroll in this program and that there is sufficient capacity to serve the customers.

Customers subscribe to a percentage of the total capacity of all solar resources under the program based on their previous 12-month average monthly usage.<sup>3</sup> This percentage

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<sup>3</sup> If previous 12-month historical usage is not available, the average monthly usage will be derived from as many months as available. For customers establishing new service, the class average monthly usage will be used.

allocation is set at the time of customer subscription but may be revisited periodically to ensure accurate allocations of project capacity.

There is no minimum length of time that a customer must take service under this program. There is also no termination fee associated with un-enrolling from the DAC-GT program. In the event a customer elects to opt-out of SD Community Power's service, they'll no longer receive service under this program with the change becoming effective no later than two billing periods after the date that SD Community Power receives the customer's opt out request; the same is true for those customers who elect to un-enroll from or cease to be eligible for DAC-GT. Customers are eligible to remain on the DAC-GT for a period of up to 20 years from the date they first began service under the program.

In the event that a customer turns off electric service at their current address and moves to a new location, the customer will need to recertify eligibility at the new location for service under this program. If they still meet the eligibility requirements the customer will retain their status as a program participant so long as the customer's turn-on date at the new location is within 90 days of the final billing date at their original location. Customers who, after enrollment into the DAC-GT, become ineligible for CARE or FERA will be unenrolled from this program.

4. **Maximum subscription per customer.** Enrollment in this program is capped at two megawatts for any single customer.
5. **Metering.** All customers must be metered according to the requirements of their OAT.

## **APPENDIX B**



**Electric Schedule DAC-GT, Disadvantaged Communities Green  
Tariff Program (Redlined)**

*Effective Date: October 27, 2024*

**Deleted:** March 16, 2023



## San Diego Community Power Disadvantaged Communities Green Tariff Program

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Qualified Facilities are defined as new Renewable Portfolio Standard (“RPS”) eligible generating facilities, [and RPS-eligible generating facilities paired with storage](#), with a nameplate rated generating capacity between 500 kW to 20 MW that are located within [or no more than five miles from](#) a DAC in San Diego Gas and Electric’s (“SDG&E”) IOU service territory and that supply energy to [SD Community Power](#) via a Power Purchase Agreement for the purposes of meeting customer subscriptions under this program.

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This program will auto-enroll customers based on a criterion specified in the Terms and Conditions below. Once [SD Community Power](#) reaches its DAC-GT program cap, a waitlist will be maintained for new subscriptions. When program capacity becomes available, [SD Community Power](#) will enroll customers based on the criteria specific.

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This program is not available to customers served under standby service, master-metered schedules, non-CARE/FERA eligible rates, Net Energy Metering rates, non-residential rates, Direct Access customers or SDG&E bundled customers.

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### RATES AND CREDITS

Customers taking service on this rate schedule will receive a 20% discount on the electric portion of the bill compared to their otherwise applicable [tariff](#) (“OAT”), including [SD Community Power](#) generation charges, SDG&E transmission and distribution charges, and SDG&E CCA PCIA charges. The discount will be applied prior to the application of state and local taxes. This discount applies so long as customers are enrolled under the program and compliant with all the eligibility and enrollment terms.

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- e. Net Energy Metering schedules;
- f. Other 100% renewable energy rates including SD Community Power's 100% Power100 rate;
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Customers subscribe to a percentage of the total capacity of all solar resources under the program based on their previous 12-month average monthly usage.<sup>4</sup> This percentage

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