California Public Utilities Commission

ADVICE LETTER SUMMARY ENERGY UTILITY



MUST BE COMPLETED BY UT	ILITY (Attach additional pages as needed)				
Company name/CPUC Utility No.: San Diego Community Power ("SDCP")					
Utility type: X ELC GAS WATER PLC HEAT	Contact Person: Stephen Gunther Phone #: (619) 657-0419 E-mail: sgunther@sdcommunitypower.org E-mail Disposition Notice to: sgunther@sdcommunitypower.org				
EXPLANATION OF UTILITY TYPE ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat WATER = Water	(Date Submitted / Received Stamp by CPUC) July 8, 2024				
Advice Letter (AL) #:21-E	Tier Designation: 2				
Subject of AL: San Diego Community Power's Program and Community Solar for 2025	Disadvantaged Communities Green Tariff r Green Tariff Program Budget Estimates				
Keywords (choose from CPUC listing): Compli	ance				
AL Type: Monthly Quarterly X Annue	al One-Time Other:				
If AL submitted in compliance with a Commiss Resolution #: D.18-06-027, E-4999, E-5102, E-512					
Does AL replace a withdrawn or rejected AL? I	f so, identify the prior AL: n/a				
Summarize differences between the AL and th	e prior withdrawn or rejected AL: n/a				
Confidential treatment requested? Yes	X No				
If yes, specification of confidential information: See Advice Letter 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 X No					
Requested effective date: 8/7/24	No. of tariff sheets: n/a				
Estimated system annual revenue effect (%): r	n/a				
Estimated system average rate effect (%): n/a					
When rates are affected by AL, include attach (residential, small commercial, large C/I, agricu	nment in AL showing average rate effects on customer classes ultural, lighting).				
Tariff schedules affected: n/a					
Service affected and changes proposed ^{1:} See	Advice Letter				
Pending advice letters that revise the same tar	iff sheets: n/a				

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: <u>EDTariffUnit@cpuc.ca.gov</u>	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		
	Name: Title: Utility Name: Address: City: State: 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	



PO Box 12716 San Diego, CA 92112 sdcommunitypower.org

July 8, 2024

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

SDCP Advice Letter 21-E

RE: San Diego Community Power's Disadvantaged Communities Green Tariff Program and Community Solar Green Tariff Program Budget Estimates for 2025

Pursuant to California Public Utilities Commission's ("Commission") Resolution E-4999¹, Resolution E-5102,² and Resolution E-5125,³ San Diego Community Power ("SDCP") respectfully submits this Advice Letter ("AL") for approval of its program budget estimates and marketing, education, and outreach ("ME&O") plan for SDCP's Disadvantaged Communities Green Tariff ("DAC-GT") and Community Solar Green Tariff ("CSGT") programs.

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.2, Resolution E-4999, Resolution E-5102, and Resolution E-5125, this AL is submitted with a Tier 2 designation.

EFFECTIVE DATE

This AL will become effective on August 7, 2024, which is 30 days after the date of its submission.

BACKGROUND

On June 21, 2018, the Commission issued Decision ("D.") 18-06-027 adopting new programs to promote the installation of renewable generation among residential customers in Disadvantaged Communities ("DACs"), as directed by the California Legislature in Assembly Bill 327 (Perea), Stats. 2013, Ch. 611. Pursuant to D.18-06-027, Community Choice Aggregators ("CCAs") may develop and implement their own DAC-GT and 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 advice letter on October 12, 2022, to create DAC-

¹ CPUC Resolution E-4999 at 67 (Ordering Paragraph ("OP") 2) and 68 (OP 4).

² CPUC Resolution E-5102 at 7-8.

³ CPUC Resolution E-5125 at 11 (OPs 2 and 3).

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 SDCP's DAC-GT and CSGT programs by issuing Resolution E-5246 on March 20, 2023. Resolution E-5246 requires SDCP to "submit an annual program budget estimate and an annual ME&O plan by February 1st of every year, starting in 2024, for the next program year."⁴ Resolution E-4999 provides similar reporting and budgeting requirements and outlines the descriptions to be provided for each budget line item.⁵ In Resolution E-5125, the Commission ordered program administrators to submit any above-cap program administration costs and ME&O expenses with an accompanying rationale for why an exceedance is warranted in a Tier 2 advice letter. Accordingly, SDCP files this Tier 2 AL in compliance with Resolution E-4999, Resolution E-5102, and Resolution E-5125 and submits the annual budget estimate detailed herein for Commission approval.

On December 4, 2023, SDCP along with the Joint Community Choice Aggregators ("<u>CCAs</u>") requested an extension of time to submit the DAC-GT and CSGT budget advice letters to April 1, 2024. On January 11, 2024, the Joint CCAs revised the request for extension of time to the later of May 1, 2024 or 30 days after the issuance of a Final Decision in the Consolidated Applications for Review of the Green Access Programs, A.22-05-022. The extension request was granted on January 24, 2024.

On June 7, 2024, the Commission issued D.24-05-065 discontinuing CSGT and transferring all remaining un-procured capacity assigned to this tariff to a modified DAC-GT.⁶ As such, SDCP's budget forecast reflect the discontinuation of CSGT and modifications to DAC-GT.

In this program budget, SDCP includes both the budget reconciliation for the previous program year (PY) (i.e., PY 2023) and the budget forecast for the third PY (i.e., PY 2025). In addition to budget reconciliation and forecast, annual program budget submissions must also include details on program capacity and customer enrollment numbers for both programs. More specifically, reports on:

- 1. Existing solar generation capacity at previous PY's close (i.e., March 20, 2024);
- 2. Forecasted solar generation capacity under contract for procurement in the upcoming PY;
- 3. Customers served at previous PY's close (i.e., March 20, 2024); and
- 4. Forecasted customer enrollment for the upcoming PY.

⁴ Resolution E-5246 at 8.

⁵ Resolution E-4999 at 8 and OPs 2-4.

⁶ CPUC D.24-05-056 at OP 2 and 3.

DISCUSSION

1. Program Year 2023 Unspent Balance

A summary of SDCP's approved PY 2023 and PY 2024 budgets are presented below in Table 1.

				-					
Category			ſ	DAC-GT				CSGT	
Category		2023		2024		Total	2023	2024	Total
Generation Cost Delta	\$	-	\$	-	\$	-	\$ -	\$ -	\$ -
20% Bill Discount	\$	-	\$	-	\$	-	\$ -	\$ -	\$ -
Program Administration									
Program Management	\$	175,500	\$	234,000	\$	409,500	\$ 135,000	\$ 180,000	\$ 315,000
Information Technology	\$	30,000	\$	15,000	\$	45,000	\$ 30,000	\$ 15,000	\$ 45,000
Billing Operations	\$	18,000	\$	18,000	\$	36,000	\$ 18,000	\$ 18,000	\$ 36,000
Regulatory Compliance	\$	7,500	\$	7,500	\$	15,000	\$ 7,500	\$ 7,500	\$ 15,000
Procurement	\$	75,000	\$	75,000	\$	150,000	\$ 75,000	\$ 75,000	\$ 150,000
Subtotal Program Administration	\$	306,000	\$	349,500	\$	655,500	\$ 265,500	\$ 295,500	\$ 561,000
Total Fir	st T	wo Years	Pro	gram Adı	nini	istration			\$ 1,216,500
Marketing, Education, & Outreach									
Outreach and Material Costs	\$	30,000	\$	30,000	\$	60,000	\$ 30,000	\$ 30,000	\$ 60,000
Local CBO/Sponsor Costs	\$	-	\$	-	\$	-	\$ -		\$ -
Subtotal	\$	336,000	\$	379,500	\$	715,500	\$ 295,500	\$ 325,500	\$ 621,000
Tot	tal F	irst Two Y	ear	s Progr <u>an</u>	n To	tal			\$ 1,336,500

Table 1. SDCP's Appr	oved PY 2023 and	PY 2024 Budgets
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In PY 2023, SDCP spent less than the previously requested amounts for the DAC-GT and CSGT programs. SDCP's PY 2023 approved budget, actual expenses, and unspent balance are indicated in Table 2 below.

Table 2. SDCP's PY 2023 Expenses and Unspent Balance

	DAC-GT	CSGT	Total
Generation Cost Delta ⁷	\$0	\$0	\$0
20% Bill Discount	\$0	\$0	\$0
Program Administration	\$110,774	\$94,103	\$204,877
Marketing, Education & Outreach	<mark>\$7,</mark> 814	\$8,168	\$15,983
PY 2023 Actual Expenses Total	\$118,589	\$102,271	\$220,860
PY 2023 Approved Program Budget	\$336,000	\$295,500	\$631,500
PY 2023 Unspent Balance	(\$217,411)	(\$193,229)	(\$410,640)

⁷ Reflects realized and accrued expenses for PY 2021 as of February 1, 2022.

SDCP's Above Market Generation Costs figures include all realized and accrued expenses for 2023 as of the date of this AL.⁸

2. Program Budget Estimates for Program Year 2025

For PY 2025, SDCP is proposing a total budget of \$362,747 for the DAC-GT and \$0 for CSGT programs as the program is discontinued. Table 3 shows the proposed program budgets using the budget categories required in Resolution E-4999. The specific budget categories are discussed further below along with detailed budget information for both programs.

Table 3. SDCP's Proposed Budgets for DAC-GT for PY 2025

Category	DAC-GT	Total
Generation Cost Delta	\$0	\$0
20% Bill Discount	\$0	\$0
Program Administration	\$348,581	\$348,581
Marketing, Education & Outreach	\$14,166	\$14,166
PY 2025 Actual Expenses Total	\$362,747	\$362,747

For PY 2025, SDCP requests no remittances for DAC-GT. This is a result of SDCP's total PY 2023 unspent funds (\$217,411) exceeding its total requested PY 2025 budget for DAC-GT. Given the discontinuation of CSGT, SDCP requests the \$193,229 in upsent funds from PY 2023 for CSGT to be applied to the remaining budget items for DAC-GT, as detailed in Table 4 below.

Table 4. SDCP's Remittance Request for DAC-GT and CSGT for PY 2025

All des

Category	DAC-GT	CSGT	Total
Above Market Generation Costs			
Generation Cost Delta	<mark>\$</mark> 0	\$0	\$0
Subtract PY 2023 Unspent Funds	(\$217,411)	(\$193,229)	(\$410,640)
Remittance Request for Above Market Generation Costs	\$0	\$0	\$0
Other Budget Items			
20% Bill Discount	\$0	\$0	\$0
Program Administration	\$348,581	\$0	\$348,581

⁸ "Above Market Generation Costs" refers to "net renewable resource costs in excess of the otherwise applicable class average generation rate that will be used to calculate DAC-GT and CSGT customers' bills" (Resolution E4999, at 27, FN 61).

Marketing, Education & Outreach	\$14,166	\$0	\$14,166		
Other Budget Items Subtotal	\$362,747	\$0	\$362,747		
Subtract PY 2023 Unspent Funds	\$145,336	\$0	\$145,336		
Remittance Request for Other Budget Items	\$145,336	(\$193,229)	(\$47,893)		
Total Remittance Request					
PY 2025 Budget Total	\$362,747	\$0	\$362,747		
Subtract PY 2023 Unspent Funds	\$145,336	(\$193,229)	(\$47,893)		
PY 2025 Remittance Request	\$0	\$0	\$0		

a. Budget Details

Resolution E-4999 requires that annual budget submissions include the following:⁹

- Line items for Above Market Generation Costs
- 20 percent bill discount for all participating customers ("20 Percent Bill Discount" or "20% Bill Discount")
- Program administration costs ("Program Administration Costs")
- ME&O funding ("ME&O Costs")
- Independent evaluator

SDCP addresses these five requirements in the following subsections.

i. Above Market Generation Costs

SDCP received numerous bids for new solar resources to serve its DAC-GT program. SDCP conservatively anticipates not having a new DAC-GT permanent resource online in 2025 due to lead times of permitting, construction, and interconnection processes, and delays from regulatory and programmatic changes occurring within the Commission's Green Access Proceeding, and therefore does not forecast a generation cost delta for the program as it cannot be served with an interim resource.

The Above Market Generation Costs for DAC-GT in PY 2025 will be calculated by comparing the generation cost for DAC-GT resources to the generation cost for the base product – SDCP's "PowerOn" product – that customers would otherwise receive if they were not participating in the programs. The generation cost for the base product is a weighted average of the generation costs of the product's renewable and non-renewable content, including Resource Adequacy. The delta between this weighted average cost and the generation cost of the DAC-GT resource will then be multiplied by the forecasted volume to be served each month to arrive at the total Above Market Generation Costs from the program. The budget estimates for the Above Market

⁹ Resolution E-4999 at 67 (OP 2).

Generation Costs in PY 2025 are summarized in Table 5.

	DAC-GT	Total
Total customer load (kWh)	0	0
Total unsubscribed output (kWh)	0	0
Total volume (kWh)	0	0
Above Market Generation Costs	\$0	\$0

Table 5: SDCP's Estimated Above Market Generation	Costs for DAC-GT for PY 2025
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ii. 20 Percent Bill Discount

As described in this advice letter, program participants will receive a 20 percent discount on the otherwise applicable rate, to be applied as a bill credit to their SDCP utility charges. SDCP's 2025 forecasted bill discount costs include both the generation portion of the electric bill as set by SDCP as well as the delivery portion of the electric bill as set by San Diego Gas and Electric Company ("SDG&E"). SDCP's PY 2025 budget does not include an estimated total amount of the customer bill discount to be recovered, as SDCP does not have interim resources and is not expected to have resources online and customers enrolled until PY 2026. The budget estimates will be based on forecasted monthly enrollment in the DAC-GT program and average monthly CARE customer bills in SDCP's service territory.

Category	DAC-GT	CSGT	Total
Total New Customer Enrollment PY 2025	0	0	0
Cumulative Customers Enrolled	0	0	0
20 Percent Bill Discount	\$0	\$0	\$0

iii. Program Administration Costs

Administration costs are broken into Program Management, Information Technology ("IT"), Billing Operations, Regulatory Compliance, and Procurement. These cost categories are discussed further in the following subsections. Resolution E-4999 adopts a cap of 10 percent of each program's total annual budget to be allocated to Program Administration Costs.¹⁰ However, Resolution E-5125 acknowledges that delayed implementation of DAC-GT and CSGT programs may lead to no or low implementation costs, resulting in a high percentage of Program Administration Costs relative to the overall program budget.¹¹

 $^{^{10}}$ Resolution E-4999 at 57 (Findings and Conclusions \P 41).

¹¹ Resolution E-5125 at 6-7.

For PY 2025, SDCP estimates total Program Administration Costs of \$348,581 for DAC-GT, which is 96% of the total DAC-GT budget of \$362,747. SDCP does not estimate costs for CSGT in PY 2025, as the program is discontinued and is therefore zero.

The percentage of the DAC-GT Program Administration budget compared to the overall program budgets is currently higher than the 10 percent cap because we anticipate no enrollment for the DAC-GT program in PY 2025, and therefore the total program budget for PY 2025 does not include fully enrolled costs for the 20 Percent Bill Discount or Above Market Generation Costs. The CPUC recognized in Resolution E-5125 that "[u]ntil a program begins delivering customer benefits and accruing implementation costs, the program administration and ME&O costs will automatically exceed the 10 and 4 percent thresholds."¹² Resolution E-5125 further recognized that full enrollment into the DAC-GT program may take longer than two start-up years and found that budget caps for Pacific Gas and Electric Company ("PG&E") and Southern California Edison Company ("SCE") were unnecessary when their respective programs did not have any Above Market Generation Costs or 20 Percent Bill Discounts.¹³ SDCP requests that the Commission applies the same logic in consideration of SDCP's request to exceed the 10 percent cap on Program Administration Costs for its DAC-GT program.

Table 7 shows the total proposed Program Administration Costs for the DAC-GT program for PY 2025, and the estimates are discussed in further detail as follows.

Category	DAC-GT	Total
Program Management	\$170,648	\$170,648
Information Technology	<mark>\$28</mark> ,522	\$28 <mark>,522</mark>
Billing Operations	\$55,742	\$55,742
Regulatory Compliance	\$4,541	\$4,541
Procurement	\$89,129	\$89,129
Total	\$3 <mark>48,581</mark>	\$348,581

Table 7: SDCP's Proposed Program Administration Budget for DAC-GT for PY 2025

1. Program Management

SDCP estimates program management costs of \$170,648 in PY 2025 for staff time to design and initiate program implementation, marketing, procurement, and ensure coordination with SDG&E and the Commission for budgetary and regulatory compliance. Program management costs are no longer shared and split evenly between the two program budgets. Table 8 shows the details of the program management budget proposed for PY 2025.

¹² Resolution E-5125 at 6-7.

 $^{^{\}rm 13}$ Id. at 7

Table 8: Program Management Budget Details

Position	2025 Fully Loaded Hourly Rate	2025 % Yr.	2025 Hours	2025 Total Labor Spend
Senior Program Associate	\$98	80%	1,664	\$163,565
Senior Programs Manager	\$150	1.18%	24	\$3,605
Director of Programs	\$166	0.6%	12	\$1,994
Financial Analyst	\$85	0.3%	6	\$510
Senior Finance Manager	\$162	0.3%	6	\$974
Total			1,700	\$170,648

2. Information Technology (IT)

SDCP estimates costs of \$28,522 for the DAC-GT program and \$0 for the CSGT program as the CSGT program is no longer in scope in PY 2025 for vendor services related to information technology. For the DAC-GT program, these costs will cover building out a Geographic Information System (GIS) mapping tool to link census tract data with customer attribute data and update it within SDCP's Customer Relationship Management (CRM) system. Additionally, for DAC-GT, these costs will cover building out a system to provide automated messaging to customers and integration of new features into SDCP's CRM system to track customers.

3. Billing Operations

SDCP estimates costs of \$55,742 for the DAC-GT program in PY 2025 for labor related to billing operations, including preparation of implementation of rates and 20% bill discount credits. These costs reflect the labor and programming work necessary to reflect the bill discount for these programs on the bills of participating customers.

4. Regulatory Compliance

All de

SDCP estimates a total regulatory compliance cost of \$4,541 for DAC-GT and \$0 for the CSGT program as the CSGT program is no longer in scope in PY 2025, for staff time to develop Advice Letters and ensure regulatory compliance. Regulatory compliance costs were once shared across the two programs and no longer split evenly between the two program budgets as set forth in Table 9.

Table 9: Regulatory Budget Details for PY 2025

Category	DAC-GT	Total
Advice Letter Development	\$4,541	\$4,541
Total	\$4,541	\$4,541

5. Procurement

SDCP estimates total procurement costs of \$89,129 for DAC-GT and \$0 for the CSGT program as the CSGT program is no longer in scope in PY 2025, as set forth in Table 10. Procurement cost estimates were determined by taking actual costs from prior SDCP distributed resource solicitations and adjusting them based on the size, scope, and complexity of the solicitations for these programs. These costs were once shared among the two programs and are no longer spread evenly across the two programs for purposes of setting program-specific budgets.

Table 10: Procurement Budget Details for PY 2025

Position	2025 Fully Loaded Hourly Rate	2025 % Yr.	2025 Hours	2025 Total Labor Spend
Senior Local Development Manager	\$167	24%	497	\$83,011
Senior Portfolio Manager	\$149	0.6%	12	\$1,783
Director of Power Contracts	\$147	0.6%	12	\$1,761
Managing Director Power Services	\$215	0.6%	12	\$2,547
Total			533	\$89,129

iv. ME&O Costs

For PY 2025, SDCP estimates total ME&O costs of \$14,166 for DAC-GT, which is 4 percent of its total budget of \$362,747. Resolution E-4999 adopts a cap of 4 percent of each program's total annual budget to be allocated to ME&O.¹⁴

The percentage of the DAC-GT ME&O Costs is 4% of the overall DAC-GT budget because (1) lower than anticipated Above Market Generation Costs and 20 Percent Bill Discount to the proportion of the ME&O budget relative to the overall DAC-GT budget and (2) a delay in fully enrolling customers and procuring resources beyond the initial two years of the program requires a sustained ME&O budget to market the DAC-GT program in a manner consistent with extended procurement and enrollment timeframes. A detailed account of the PY 2025 ME&O Costs is

¹⁴ Resolution E-4999 at 57 (Findings and Conclusions ¶ 41).

available in Table 10 below.

Category	DAC-GT	Total
Targeted Marketing		
Digital Ads	\$200	\$200
Digital creative development & production	\$1,000	\$1,000
Flyers/fact sheets printing	\$500	\$500
Translation services	\$2,000	\$2,000
Subtotal	\$3,700	\$3,700
Website		
DAC-GT web page	\$1,000	\$1,000
Web page translations	\$300	\$300
Subtotal	\$1,300	\$1,300
TOTAL	\$5,000	\$5,000

Table 10: SDCP's Proposed ME&O Budget for DAC-GT for PY 2025

b. Program Capacity and Customer Details

Resolution E-4999 states, "for each program, the budget submission must include details on the program's existing capacity, the capacity targeted for procurement in that program year, the number of customers currently served, and the number of additional customers estimated to be served."¹⁵ Table 11 provides this information for the PY 2025 budget.

Program Detail	DA	C-GT	CS	GT
	PY 2024	PY 2025	PY 2024	PY 2025
Existing Capacity at beginning of period ¹⁶	0 MW	0 MW	0 MW	0 MW
Incremental Capacity targeted for procurement	0 MW	0 MW	0 MW	0 MW
Number of customers served at beginning of PY	0	0	0	0
Number of additional customer enrollments estimated	0	0	0	0
Total customer load	0 MWh	0 MWh	0 MWh	0 MWh

c. GHG Revenue and Public Purpose Program Fund Set Asides

Upon approval of this AL, SDG&E will include SDCP's PY 2025 program budget in its 2025

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¹⁵ Resolution E-4999 at 27.

¹⁶ DAC-GT program participants will not be serviced using interim resources.

ERRA Forecast. Going forward, SDG&E will remit program funds to SDCP in quarterly installments (by January 1, April 1, July 1, and October 1 of each year).

In accordance with Resolution E-4999, once received, SDCP will track the program funds in separate accounts for the DAC-GT program and will record all generation cost deltas, customer bill discounts, and program expenses for each program.¹⁷ SDCP's 2025 Annual Budget Advice Letter will include a reconciliation of the PY 2023 budget estimate if necessary (with respect to adjusted Above Market Generation Costs for PY 2023) and PY 2024 budget estimate with actual expenditures, along with its PY 2025 budget forecast.

CONCLUSION

For the reasons stated in this AL, SDCP requests approval of its PY 2025 budgets for its DAC-GT program. In accordance with Resolution E-5125, SDCP further requests that its PY 2025 budget to be exempt from the 4% budget cap for ME&O Costs for the DAC-GT program and the 10% budget cap for Program Administration Costs for the DAC-GT program.

APPENDICES

Appendix A: Annual Marketing, Education, and Outreach Plan

Appendix B: DAC-GT Budget Workpapers

NOTICE

Anyone wishing to protest this AL filing may do so by letter via U.S. Mail, facsimile, or electronically, 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 San Francisco, CA 94102 Email: <u>EDTariffUnit@cpuc.ca.gov</u>

In addition, protests and all other correspondence regarding this AL should transmitted electronically to the attention of:

Stephen Gunther Regulatory Manager San Diego Community Power PO Box 12716 San Diego, CA 92112

¹⁷ Resolution E-4999 at 26-27.

sgunther@sdcommunitypower.org

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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.

Copy (via e-mail): Service List – R.14-07-002 Tory Francisco, Energy Division (tory.francisco@cpuc.ca.gov) Joshua Litwin, Energy Division (joshua.litwin@cpuc.ca.gov)





PO Box 12716 San Diego, CA 92112 sdcommunitypower.org

APPENDIX A



1

Marketing Education and Outreach Plan for the Disadvantaged Communities Green Tariff Program for Program Year 2025

Proposed by



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1. PURPOSE AND GOALS

San Diego Community Power ("SDCP") will develop and implement a targeted customer marketing, education, and outreach ("ME&O") campaign to ensure potential customers in disadvantaged communities ("DACs") are aware of the opportunity to benefit from the Disadvantaged Communities Green Tariff ("DAC-GT") program. SDCP's ME&O strategy has four main goals:

- 1. Enroll eligible customers in the DAC-GT program;
- 2. Increase awareness of and enrollment in CARE and FERA discount programs;
- 3. Increase customer awareness of energy use, savings, and other customer incentives, rate options, discounts, or programs; and
- 4. Identify and address barriers and benefits to program participation and ensure outreach to DAC and hard-to-reach customers is accessible and equitable.

Throughout this process, SDCP aims to achieve meaningful and diverse customer engagement through a culturally-competent, multilingual approach. To achieve these goals, SDCP will develop a targeted customer engagement campaign that leverages community-based marketing best practices such as:

- A mix of multilingual and culturally-competent communications including community advertising (e.g. banners, newsprint), geo-targeted digital ads, and direct mail; and
- Direct customer outreach and partnerships with community-based organizations ("CBOs"), and local government agencies.

Ultimately, SDCP will measure ME&O program success by the number of customers enrolled in the DAC-GT program. We will also measure program success by the overall number of customers reached, and the diversity of customers reached. The following subsections provide additional details about SDCP's ME&O approach for the DAC-GT program.

2. GUIDING PRINCIPLES

SDCP is committed to developing diverse and culturally appropriate communication strategies to ensure that stakeholders can participate in decisions and actions that impact their communities. As such, SDCP commits to the following guiding principles throughout the ME&O engagement process for the DAC-GT program. SDCP aims to:

- Achieve diverse and meaningful engagement that reflects the demographics of DACs to ensure equitable outreach across race, income, and age barriers;
- Maintain transparency and accessibility of information by bringing the information directly to customers in their neighborhood, in their community, or in interest space to better engage them in the process; and
- Build a collaborative process with community partners to ensure barriers and benefits to participation are considered in ME&O activities to the maximum extent possible.

3. TARGET AUDIENCE

196 40

Given enrollment specifications around the programs, the primary target audience for the ME&O strategy are customers living in DACs per CalEnviroScreen 4.0.¹⁸ SDCP's service area includes customers in the following neighborhoods¹⁹:

Census Tract	Nearby City (to approximate location only)	Zip	California County
6073003601	San Diego	92113	San Diego
6073005000	San Diego	92113	San Diego
6073004900	San Diego	92113	San Diego
6073003902	San Diego	92113	San Diego
6073003901	San Diego	92113	San Diego
6073003404	San Diego	92102	San Diego
6073012501	Chula Vista	91910	San Diego
6073003403	San Diego	92102	San Diego
6073003603	San Diego	92113	San Diego
6073012502	Chula Vista	91910	San Diego
6073003501	San Diego	92113	San Diego
6073003301	San Diego	92113	San Diego
6073002712	San Diego	92105	San Diego
6073011700	National City	91950	San Diego
6073002502	San Diego	9 <mark>2105</mark>	San Diego
6073003502	San Diego	9 <mark>211</mark> 3	San Diego
6073004800	San Diego	<mark>921</mark> 02	San Diego
6073011601	National City	<mark>919</mark> 50	San Diego
6073011801	National City	<mark>919</mark> 50	San Diego
6073011602	National City	<mark>9195</mark> 0	San Diego
6073011802	National City	9 <mark>195</mark> 0	San Diego
6073005100	San Diego	92113	San Diego
6073013205	Chula Vista	91911	San Diego
6073002402	San Diego	92105	San Diego
6073010013	San Diego	92173	San Diego
6073003303	San Diego	92113	San Diego

Figure 1: Qualifying Neighborhoods in SDCP Service Territory.

¹⁸ Given Resolution E-5212's recognition of Federally recognized tribal lands are DACs, if these tribal governments become part of SDCP's unbundled service, outreach will include these additional areas.

¹⁹ Source: Office of Environmental Health Hazard Assessment (OEHHA) CalEnviroScreen 4.0 identifying the Top 25% of Disadvantaged Communities:

https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4.0/

6073002501	San Diego	92105	San Diego
6073003602	San Diego	92113	San Diego
6073012402	Chula Vista	91910	San Diego
6073004000	San Diego	92102	San Diego
6073003001	San Diego	92114	San Diego
6073012600	Chula Vista	91910	San Diego
6073012102	National City	91950	San Diego
6073003305	San Diego	92113	San Diego
6073021900	National City	91950	San Diego
6073013307	Chula Vista	91911	San Diego
6073002202	San Diego	92105	San Diego
6073004700	San Diego	92102	San Diego
6073013103	Chula Vista	91911	San Diego
6073010111	San Diego	92173	San Diego
6073002711	San Diego	92105	San Diego
6073022000	National City	91950	San Diego
6073012700	Chula Vista	91910	San Diego
6073003304	San Diego	92102	San Diego

4. ME&O TACTICS AND STRATEGIES

4.1 Solicitation Engagement Objectives

During the active solicitation period, attract applications by:

- 1. Achieving diverse and meaningful engagement with developers that reflect the demographics and interests of DACs;
 - a. Develop a potential community based organizations (CBO) database
 - b. Present at Public and Stakeholder Groups
 - i. Chambers of Commerce
 - ii. School Districts
 - iii. Energy Groups/Coalitions
 - c. Host Informational Webinars on the Solicitation Process
 - d. Host In-Person and/or Virtual Cross-Sector Collaborative Workshops for Developers
 - e. Create and Update Interested Parties List
 - f. Facilitate member agency engagement at monthly meetings
 - g. Assessing CBO bandwidth through an RFO process to identify eligible CBOs with capacity for outreach
- 2. Maintaining transparency and accessibility of information by working with developers to bring the information directly to customers in their neighborhood, in their community, or in interest space to better engage them in the process; and
- Dedicated website page for solar developers

- □ Fact Sheets advertising opportunity benefits
- Emails
- □ Social Media Content
- □ Newsletter

Once a bid is deemed successful AND/OR interim resources have been approved, during project implementation:

- Implement program outreach goals and objectives;
- Build a collaborative process with community partners to ensure project barriers and benefits to participation are considered in ME&O activities to the maximum extent possible; and
- Ensure equitable outreach across race, income, and age barriers, to include a multilingual and culturally competent approach that considers the specific needs of DAC communities in SDCP's service area.



ch munities lar	lstance ms; and tomers is					
4.2 Outreach Objective San Diego Community Power (SDCP) will develop and implement a targeted customer marketing, education, and outreach (ME&O) campaign to ensure potential customers in disadvantaged communities (DACs, or as SDCP refers to them, communities of concern) are aware of the opportunity to benefit from the Disadvantaged Communities Green Tariff (DAC-GT, aka Solar Discount Program) and (Solar for Our Communities).	Outreach Goals Auto-enroll eligible customers in the DAC-GT programs (expected in 2026); Increase awareness of and enrollment in California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) discount programs; Increase customer awareness of energy use, savings, and other customer incentives, rate options, discounts, or programs; and Identify and address barriers and benefits to program participation and ensure outreach to DAC and hard-to-reach customers is accessible and equitable.			•	Q4 Aggressive CARE/FERA Enrollment	
education, P refers to iff (DAC	iily Electr , discount and hard-		Shortlist Applications, Negotiation Period Begins Q4	•		
eting, e s SDC een Tar	nd Fam pptions			•	Q3 Solicitation Period Closes	
omer mark ACs, or a Inities Gro	(CARE) a ives, rate o utreach to		Post-Solicitation Webinar Q3	•	7	
ted custc nities (D Comm)26); Energy (rr incenti ensure o			•	Develop and Execute Outreach Agreement with CBO	
ıt a targel d commu lvantaged	cted in 20 Rates for r custome ttion and		CARE/FERA Promotion	•		
nplemer vantage ne Disac	is (expe ternate] nd othe			•	Application Promotion Roadshow	
lop and in s in disad ⁵ fit from th (ties).	DAC-GT programs (expected in 2026); nt in California Alternate Rates for Ener rgy use, savings, and other customer inc nefits to program participation and ensu		Workshop/Com munity Listening Sessions/ Mixers	•		u
will deve customery to bene	DAC-G7 nt in Cali rgy use, s nefits to J	neline:		•	Q2 Solicitation Opens	rap-Up ar Invitati Promotion
SDCP) - otential o portunity or Our O	rs in the inrollme s of ene s and be	egy Tin	Pre-Solicitation Webinar Q1	•		ateral W ₁ I Webina ur 1 ur 2 ication I
4.2 Outreach Objective San Diego Community Power (SDCP) will develop an (ME&O) campaign to ensure potential customers in d of concern) are aware of the opportunity to benefit fro Discount Program) and (Solar for Our Communities).	 4.3 Outreach Goals 1. Auto-enroll eligible customers in the 2. Increase awareness of and enrollme (FERA) discount programs; 3. Increase customer awareness of ene 4. Identify and address barriers and be accessible and equitable. 	4.4 Phase I Engagement Strategy Timeline:		•	Q1 Pre-Solicitation Webinar	 Q1 2025 - Website Launch + Collateral Wrap-Up Q1 2025 - Revise Data Base Q1 2025 - Webinar Dry-Run, Send Webinar Invitations Q1 2025 - Pre-Solicitation Webinar 1 Q1 2025 - Pre-Solicitation Webinar 2 Q2 2025 - Solicitation Opens Q1 - Q2 2025 Q2 2025
4.2 Outreach Objective San Diego Community P (ME&O) campaign to en of concern) are aware of Discount Program) and (1	Outreach Goals uto-enroll eligible custol Increase awareness of an (FERA) discount progran Increase customer aware Identify and address barr accessible and equitable.	ngagem	Webinar Dry- Run, Send Invitations Q1	•		 Q1 2025 - Website Launch + Q1 2025 - Revise Data Base Q1 2025 - Webinar Dry-Run Q1 2025 - Pre-Solicitation W Q2 2025 - Solicitation Opens Q1 - Q2 2025 Targeted Outreach for
Jutreach Diego Cc &O) cam ncern) ar nunt Prog	 4.3 Outreach Goals 1. Auto-enroll eligibl 2. Increase awarene (FERA) discount 3. Increase custome 4. Identify and addr accessible and eg 	hase I E		•	Q1 Revise Potential CBO Database	 Websi Revise Revise Webir Webir Webir Pre-Sc Pre-Sc Solicit Solicit 2025
4.2 C San I (ME ₆ of co Disco	4.3 O 1. Au 2. Ir (H) 3. Ir 4. Ic 4. Ic a	4.4 P	Website Launch + Collateral Wrap Up Q1	•		Q1 2025 - We Q1 2025 - We Q1 2025 - We Q1 2025 - Pre Q1 2025 - Pre Q1 2025 - Soli Q1 - Q2 2025 Q1 - Q2 2025

- Technical engagement with developers
 - Schedule additional Webinar
- Schedule presentations at regional membership-association meetings
 - Boost marketing engagement for developers on LinkedIn
 - Promotion of DAC-GT for Member Agencies
- Schedule 1:1s with pertinent Councilmembers/Mayors/City Staff
 - Share opportunity at member-agency check-in
- Share opportunity at regional membership association meetings
 - o Hosting an
- o Q3 2025– Post-Solicitation Webinar
- Q3 2025 Solicitation Period Closes
- Q4 2025 Shortlist Applications, Winning Bid Selected, Negotiation Period Begins
 - PY 2025 Outreach Goals and Objective Implementation Phase I Solicitation (Audience: Developers)

BUILDIANDI (AUMICHUC: DUVIDUA)	Project Implementation (Audience: Customers)	
T HADE T	Phase II	

4.5 Program Engagement and Outreach Strategies by Audience	utreach Strategies by Audience
Inform, Involve, and Empower Developer	bower Developers through the Solicitation Process
Eligible Customers	
 Involve those yet to be enrolled in CAR Inform those already enrolled in CARE/ 	e enrolled in CARE/FERA :nrolled in CARE/FERA
Inform, Consult, and Empower Potential	power Potential Community Based Organizations
 Non-profit Community Based Organizations 	3ased Organizations
Consult and Collaborate with Potential D Organizations	with Potential Direct Outreach Partners/Community Based
Inform and Collaborate with Community	vith Community Ambassadors
 CAC Members Member Agencies' Environmental Sustainabi Member Agencies' Elected/Operational Staff Community Planning Groups 	 CAC Members Member Agencies' Environmental Sustainability Commissions and other Environmental Groups Member Agencies' Elected/Operational Staff Community Planning Groups
Inform and Empower the General Public	: General Public
Outside of DACs	

<u>Phase I Action Items:</u>	
Customer Identification	
 Identify customers who meet the proposed auto-enrollment criteria for DAC-GT through ArcGIS Consultant (Quartic) by Q1 2025. Create diorama of how projects may be located in a given community in order to drive engagement and support and the viability and location of projects by Q1 2025.) by Q1 le
Communications and Media (Provide Informational Materials)	
 Develop and send program collateral for Solar Developer and CBO outreach for solicitation Fliers/FAQs/Fact Sheets Email Invites for Webinar 	
 Develop and launch a dedroated web page on SDCP's website Identify most spoken languages in Zip-Codes Develop marketing plan and collateral for CARE/FERA enrollment ahead of Solar Discount customer auto-enrollment Tactics: 	t
 Fliers/FAQs/Fact Sheets Online Ads Social Media Content Radio Campaigns Videos 	
 A/B Message testing for CARE/FERA collaterals by end of 2025 Circulate with appropriate staff and CAC Members via Ad-Hoc Committee Develop toolkit by Q1 2025 with: FAO 	

4.6 Outreach Strategy Pillars

o FAQ

 5-slide deck on program/how to mobilize audiences Translate all collaterals, to include culturally competent and effective messaging by Q1 2025 A/B Message testing for CARE/FERA collaterals by Q1 2025 Circulate with appropriate staff and CAC Members via Ad-Hoc Committee
Community Outreach (Promote Applications and Cross-Sector Collaboration)
 Identify and engage with potential Community Based Organizations Revise Potential Community Based Organization Database by Q1 2025 Email Communication that includes the website, an invitation to the webinar, a FAQ sheet, and a list to sign up if interested
 Follow-Up in 2025 to facilitate introductions + conversations, gage interest and capacity Engage with the developer community to increase program awareness through Q1 2025 Chamber of Commerce Presentations at Member Agencies Cleantech San Diego Energy Working Group Presentation
Ŭ
Grassroots Outreach (Activate Community Leadership to Expand Outreach Capacity, Pursue Boothing Opportunities)
 Identify community events to engage directly with community members on DAC neighborhoods (near public transportation, ADA accessible) Family markets Swap meets Libraries

 Sporting events Sporting events

o Resource fairs

- o Income
- Total CARE and FERA enrollment achieved through DAC-GT outreach;
 Qualitatively measures of barriers for participation
- o Surveyso Feedback from CBOs

improve the effectiveness of outreach, if necessary. Additionally, feedback from CBO partners, surveys, on-the-ground interactions, By regularly monitoring these measures, SDCP will be able to make changes in its approach or shift the mix of ME&O channels to and message testing could alter the strategy pursued.





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APPENDIX B

15 1 - - - - - -

2025 DAC-GT Budget Request

True-up PY 2023 Forecast PY 2025

1. Budget Forecast PY 2025

Tab	Category	DAC-GT
1	Generation Cost Delta	\$ -
2	20% Bill Discount	\$ -
	Program Administration	
3a	Program Management	\$ 170,648
3b	Information Technology	\$ 28,522
3c	Billing Operations	\$ 55,742
3d	Regulatory Compliance	\$ 4,541
3e	Procurement	\$ 89,129
	Subtotal Program Administration	\$ 348,581
	Marketing, Education & Outreach	
4a	Labor Costs	\$ 6,166
4b	Outreach and Material Costs	\$ 8,000
	Subtotal ME&O	\$ 14,166
	Total	\$ 362,747

5. Budget Caps

	DAC-GT	Notes
Program Administration	96%	Max 10% of total budget after start-up years
ME&O	4%	Max 4% of total budget after start-up years

automatically calculates, do not touch								automatically calculates, do not touch						
Tab	Category				DAC-GT			CSGT						
			Forecast		Actual		True-up		Forecast		Actual		True-up	
1	Generation Cost Delta	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	
2	20% Bill Discount	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	
	Program Administration													
3a	Program Management	\$	175,500	\$	62,532	\$	112,968	\$	135,000	\$	55,554	\$	79,446	
3b	Information Technology	\$	30,000	\$	7,864	\$	22,137	\$	30,000	\$	7,864	\$	22,137	
3c	Billing Operations	\$	18,000	\$	335	\$	17,665	\$	18,000	\$	570	\$	17,430	
3d	Regulatory Compliance	\$	7,500	\$	2,741	\$	4,759	\$	7,500	\$	1,170	\$	6,330	
3e	Procurement	\$	75,000	\$	37,302	\$	37,698	\$	75,000	\$	28,945	\$	46,055	
	Subtotal Program Administration	\$	306,000	\$	110,774	\$	195,226	\$	265,500	\$	94,103	\$	171,397	
	Marketing, Education & Outreach													
4a	Labor Costs	\$	30,000	\$	5,513	\$	24,487	\$	30,000	\$	5,867	\$	24,133	
4b	Outreach and Material Costs	\$	-	\$	2,301	\$	(2,301)			\$	2,301	\$	(2,301)	
4c	Local CBO/ Sponsor Costs	\$	-	\$	-	\$	-			\$	-	\$	-	
	Subtotal ME&O	\$	30,000	\$	7,814	\$	22,186	\$	30,000	\$	8,168	\$	21,832	
	Total	Ś	336,000	Ś	118,589	Ś	217,411	Ś	295,500	Ś	102,271	Ś	193,229	

4. Final PY 2025 Budget Request Budget forecast for upcoming PY (in line 23) plus/minus true-up amount from previous PY (in line 45)

	DAC-	GT	CSGT	Г	Total	
Budget Carry-over from PY 2023	\$	(217,411)	\$	(193,229)	\$	(410,640)
Budget Forecast for PY 2025	\$	362,747	\$	-	\$	362,747
TOTAL	\$	145,336	\$	(193,229)	\$	(47,893)

Program Procurement & Customer Enrollment

Participating customer count is based on number of customers enrolled in the program at the end of 2023.

Existing Capacity & Customer Enrollment PY 2023

Category	DAC-GT	CSGT	Notes
Existing program capacity (MW)	0	0	No interim resources
Participating customers (#)	0	0	No interim resources

Forecasted Capacity & Customer Enrollment PY 2025

Category	DAC-GT	CSGT	Notes
Estimated capacity to be procured (MW)	0	0	No interim resources
Estimated customer enrollment (#)	0	0	No interim resources

 3a. FORECAST: Program Management 2025

 Includes all costs to develop and run the program, including project management, oversight, finance and reporting

 All hourly rates are fully loaded rates. Average fully loaded hourly rates for SDCP employees are \$ for 2024, including a five percent cost of living and merit increase, and a five percent contingency buffer.

LABOR COSTS

DAC-GT						
Position	Role	Но	urly Rate	Hours	Total Labor Spend	Notes
	Program development and management, budgeting,					
Sr. Program Associate	reporting	\$	98	1664	\$163,565	80% of staff time
Sr. Program Manager	Program oversight	\$	150	24	\$3,605	Increased actual by 10%
Director of Programs	Staff oversight	\$	166	12	\$1,994	Increased actual by 10%
Financial Analyst	Budgeting	\$	85	6	\$510	Increased actual by 10%
Sr. Finance Manager	Budgeting Oversight	\$	162	6	\$974	Increased actual by 10%
Total				1700	\$170,648	

CSGT CSGT is no longer in scope and therefore is zero.

DIRECT COSTS

COST CATEORIES	DAC-GT
None	
TOTAL	\$ -

TOTAL COSTS

DAC-GT	\$170.648

3b. FORECAST: Information Technology 2025

Costs to develop online tools, including (but not limited to) online enrollment tool and billing system updates. All hourly rates are fully loaded rates. Average fully loaded hourly rates for SDCP employees are \$ for 2024. Direct costs include a 5% contingency buffer.

LABOR COSTS

DAC-GT

Position	Role	Hourly Rate	Hours	Total Labor Spend	Notes
None		\$-	-	\$-	
Total			-	\$-	-

CSGT

CSGT is no longer in scope and therefore is zero.

DIRECT COSTS

COST CATEORIES	TOTAL COSTS		DA	C-GT
Harvest	\$	5,443	\$	5,443
Quartic	\$	21,000	\$	21,000
ArcGIS	\$	2,079	\$	2,079
TOTAL	\$	28,522	\$	28,522

TOTAL COSTS

DAC-GT	\$ 28,522

3c. FORECAST: Billing Operations 2025

Costs for ongoing billing operations and customer support All billing operations costs is expected to be in support of the DAC-GT program. All hourly rates are fully loaded rates. Average fully loaded hourly rates for SDCP employees are \$ for 2024, including a five percent cost of living and merit increase, and a five percent contingency buffer.

LABOR COSTS

Position	Role	Hourly Rate	Hours	Total Labor Spend	Notes
Account Services Analyst	Data analysis as needed for billing	\$74	30	\$2,211	Increased actual by 10%
Account Services Manager	Vendor Mgmt/customer support	\$118	30	\$3,531	Increased actual by 10%
Sr. Data and Systems Analyst	Data analysis as needed for billing	\$109	30	\$3,267	Increased actual by 10%
Total			60	\$5,742	

CSGT CSGT is no longer in scope and therefore is zero.

DIRECT COSTS

COST CATEORIES	TOTAL COSTS	DAC	-GT
Calpine billing support	\$ 50,000	\$	50,000
TOTAL	\$ 50,000	\$	50,000

TOTAL COSTS

DAC-GT \$55,742

3d. FORECAST: Regulatory Compliance 2025

Ongoing cost for regulatory compliance. Costs for regulatory compliance were previously split between DAC-GT and CSGT. Due to CSGT no longer being in scope, we expect higher regulatory compliance costs in 2025. All hourly rates are fully loaded rates. Average fully loaded hourly rates for SDCP employees are \$ for 2024, including a five percent cost of living and merit increase, and a five percent contingency buffer.

LABOR COSTS

DAC-GT						
Position	Role	Hourly Rate	Hours	Total Labor Spend	Notes	
Sr. Regulatory Analyst	Regulatory support for programs	\$115	24	\$2,759	Increased actual by 10%	
Director of Regulatory & Legislative Affairs	Regulatory and programmatic guidance	\$149	12	12 \$1,782 Increased actu		
Total			36	\$4,541		

CSGT

CSGT is no longer in scope and therefore is zero.

DIRECT COSTS

COST CATEORIES	TOTAL COSTS	DAC-GT
None	\$ -	\$ -
TOTAL	\$ -	\$-

TOTAL COSTS

DAC-GT 4,541 \$

 3e. FORECAST: Procurement Costs 2025

 Costs to develop and run the solicitations for solar resources under DAC-GT.

 Labor and direct costs. Direct costs are annual costs.

 All hourly rates are fully loaded rates. Average fully loaded hourly rates for SDCP employees are \$ for 2024, including a five percent cost of living and merit increase, and a five percent contingency buffer.

LABOR COSTS

DAC-GT					
Position	Role		Hours	Total Labor Spend	Notes
Sr. Local Development Manager	PPA evaluations, reporting & operations	\$167	497	\$83,011	Increased actual by 10%
Sr. Portfolio Manager	r. Portfolio Manager Contract management oversight & reporting		12	\$1,783	Increased actual by 10%
Director of Power Contracts	rector of Power Contracts Contract management oversight & reporting		12	\$1,761	Increased actual by 10%
Managing Director Power Services Staff oversight		\$215	12	\$2,574	Increased actual by 10%
Total			533	\$89,129	

CSGT CSGT is no longer in scope and therefore is zero.

DIRECT COSTS

COST CATEORIES	TOTAL COSTS (\$)	DAC-GT
None		
TOTAL	0	\$ -

TOTAL COSTS

DAC-GT \$89,129

ACTUALS: Admin Costs 2023 Labor costs are pulled from Hours tracked in Harvest Direct costs are complied/ pulled from finance/invoices

Labor Costs

	DAC-GT											
	3.a PM		3.b IT		3.c I	Billing Ops	3.d	Regulatory	3.e	Procurement	TOT	AL
03/20/23	\$	2,897.62	\$	-	\$	-	\$	60.07	\$	80.13	\$	3,037.81
April	\$	7,772.25	\$	-	\$	-	\$	266.04	\$	421.24	\$	8,459.53
May	\$	2,678.25	\$	-	\$	-	\$	173.08	\$	4,473.96	\$	7,325.29
June	\$	4,140.77	\$	-	\$	-	\$	1,082.84	\$	3,435.05	\$	8,658.66
July	\$	4,599.39	\$	-	\$	-	\$	46.48	\$	4,801.68	\$	9,447.55
Aug	\$	6,542.71	\$		\$	40.77	\$	45.79	\$	4,738.98	\$	11,368.25
Sept	\$	4,223.81	\$	-	\$	-	\$	93.01	\$	4,595.10	\$	8,911.92
Oct	\$	5,271.99	\$	-	\$	47.60	\$	138.42	\$	1,204.92	\$	6,662.93
Nov	\$	5,007.50	\$	-	\$	-	\$	92.28	\$	2,811.48	\$	7,911.26
Dec	\$	3,427.03	\$	-	\$	-	\$	46.51	\$	1,756.95	\$	5,230.49
January	\$	5,834.84	\$		\$	91.18	\$	45.81	\$	3,981.90	\$	9,953.72
February	\$	6,001.76	\$	-	\$	155.49	\$	46.51	\$	3,649.05	\$	9,852.80
03/19/24	\$	4,134.50			\$	-	\$	604.57	\$	1,351.50	\$	6,090.57
Total	\$	62,532.39	\$		\$	335.04	\$	2,741.38	\$	37,301.94	\$	102,910.74

3.a PM 3.b IT		3.c Billing Ops		3.d Regulatory		3.e Procurement		то	TAL		
\$	160.49	\$	-	\$	-	\$	60.07	\$	-	\$	220.55
\$	257.78	\$	-	\$	-	\$	-	\$	920.56	\$	1,178.33
\$	6,893.57	\$	-	\$	235.36	\$	-	\$	2,826.44	\$	9,955.37
\$	3,481.81	\$	-	\$	-	\$	43.60	\$	1,776.75	\$	5,302.16
\$	4,647.26	\$	-	\$	-	\$	46.48	\$	2,400.84	\$	7,094.58
\$	6,330.31	\$	-	\$	40.77	\$	91.57	\$	2,369.49	\$	8,832.14
\$	4,142.69	\$	-	\$	-	\$	93.01	\$	3,243.60	\$	7,479.30
\$	5,235.99	\$	-	\$	47.60	\$	138.42	\$	3,882.52	\$	9,304.53
\$	5,007.50	\$	-	\$	-	\$	138.42	\$	1,874.32	\$	7,020.24
\$	3,495.78	\$	-	\$	-	\$	46.51	\$	1,351.50	\$	4,893.79
\$	5,822.03	\$	-	\$	91.18	\$	-	\$	4,380.09	\$	10,293.29
\$	5,978.31	\$	-	\$	155.49	\$	-	\$	2,297.55	\$	8,431.35
\$	4,100.13	\$	-	\$	-	\$	511.56	\$	1,621.80	\$	6,233.48
Ś	55,553.62	Ś	-	Ś	570.40	Ś	1.169.62	Ś	28.945.46	Ś	86.239.09

Direct Costs

Program Management	Direct Costs					
Item	DAC-GT		CSGT		Total	
None					\$	-
TOTAL	\$	-	\$	-	\$	-
Information Technology	Direct Costs					
Item	DAC-GT		CSGT		Total	
Harvest	\$	2,172.00	Ş	2,172.00	\$	4,344.00
Quartic	\$	4,976.50	Ş	4,976.50	\$	9,953.00
ArcGIS	\$	715.00	\$		\$	1,430.00
TOTAL	\$	7,863.50	\$	7,863.50	\$	15,727.00
Billing Ops Direct Costs						
Item	DAC-GT		CSGT		Total	
Calpine					\$	-
TOTAL	\$	-	\$	-	\$	-
Regulatory Compliance	Direct Costs					
Item	DAC-GT		CSGT		Total	
None					\$	-
TOTAL	\$		\$	-	\$	-
Procurement Direct Co:	sts					
Item	DAC-GT		CSGT		Total	
None	\$	-	\$	-	\$	-

TOTAL \$ 7,863.50 \$ 7,863.50 \$ 15,727.00

Total Costs Category Program Management Information Technology Billing Operations Regulatory Compliance Procurement TOTAL
 DAC-GT
 CSGT

 \$
 62,532.39
 \$
 55,553.62

 \$
 7,863.50
 \$
 7,863.50

 \$
 335.04
 \$
 570.40

 \$
 2,741.38
 \$
 1,169.62

 \$
 310.194
 \$
 2,8945.46

4. FORECAST: Marketing, Education & Outreach 2025

Labor and direct costs to implement ME&O plan All hourly rates are fully loaded rates. Average fully loaded hourly rates for SDCP employees are \$ for 2024, including a five percent cost of living and merit increase, and a five percent contingency buffer.

LABOR COSTS

DAC-GT							
Position	Role	Hourly Rate	Hours	Total Labor Spend	Notes		
Sr. Marketing Manager	Material development	\$122	12	\$1,460	Increased actual by 10%		
Digital Media Coordinator	Email marketing/website updates	\$52	12	\$623	Increased actual by 10%		
Community Engagement Manager	ME&O management	\$101	20	\$2,013	Increased actual by 10%		
Public Outreach Coordinator	Outreach	\$52	12	\$626	Increased actual by 10%		
Public Outreach Coordinator	Outreach	\$48	12	\$580	Increased actual by 10%		
Director of Public Affairs	Staff oversight	\$144	6	\$864	Increased actual by 10%		
Total			74	\$6,166			

CSGT

CSGT is no longer in scope and therefore is zero.

DIRECT COSTS

Tab	ME&O Delivery Method	DAC-GT	
Outreach & Material Costs			
1	Targeted Marketing/Advertising	\$	3,700
2	Website-digital content	\$	1,300
3	Marketing vendor	\$	3,000
Total		\$	8,000

TOTAL COSTS

Back-up Details	
DAC-GT ME&O Costs	2025
Targeted Marketing	
Digital ads	\$ 200
Digital creative development & production	\$ 1,000
Flyers/fact sheets printing	\$ 500
Translation services	\$ 2,000
TOTAL	\$ 3,700
Website	
DAC-GT web page	\$ 1,000
Web page translations	\$ 30
TOTAL	\$ 1,300
DAC-GT TOTAL	\$ 5,000

ACTUALS: ME&O Costs 2023

Labor Costs

	DAC-GT	CSGT	TOTAL
03/20/23	\$ -	\$ 252.00	\$ 252.00
April	\$ 206.22	\$ 206.22	\$ 412.44
May	\$ 705.33	\$ 554.13	\$ 1,259.46
June	\$ 490.55	\$ 490.55	\$ 981.10
July	\$ 697.10	\$ 642.97	\$ 1,340.07
Aug	\$ 739.52	\$ 847.85	\$ 1,587.37
Sept	\$ 598.38	\$ 544.23	\$ 1,142.61
Oct	\$ 885.03	\$ 1,046.26	\$ 1,931.29
Nov	\$ 433.74	\$ 410.82	\$ 844.55
Dec	\$ 353.02	\$ 453.34	\$ 806.36
Jan	\$ 187.74	\$ 233.27	\$ 421.01
Feb	\$ 108.29	\$ 131.38	\$ 239.67
03/19/24	\$ 108.29	\$ 54.15	\$ 162.44
Total	\$ 5,513.19	\$ 5,867.15	\$ 11,380.34

Direct Costs

Item	DAC-GT		CSGT	
Civilian - Marketing vendor	\$	2,301.25	\$	2,301.25
TOTAL	\$	2,301.25	\$	2,301.25

Total Costs

DAC-GT	\$ 7,814.44
CSGT	\$ 8,168.40