



California Public Utilities Commission

ADVICE LETTER



ENERGY UILLIY	OF CALLY
MUST BE COMPLETED BY UT	ILITY (Attach additional pages as needed)
Company name/CPUC Utility No.: San Diego Co	ommunity Power ("SDCP")
Utfility type: 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)
Advice Letter (AL) #: 32-E	Tier Designation: 2
Program Year 2026 Keywords (choose from CPUC listing): AL Type: Monthly Quarterly/ Annu	advantaged Communities Green Tariff Program Budget Estimates for al One-Time Other: on order, indicate relevant Decision/Resolution #:
Resolution E-4999, Resolution E-5246, and D.24-05	
Does AL replace a withdrawn or rejected AL?	If 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Summarize differences between the AL and th	e prior withdrawn or rejected AL: n/a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	✓ No
	nation: vailable to appropriate parties who execute a ontact information to request nondisclosure agreement/
Resolution required? Yes No	
Requested effective date: 5/1/25	No. of tariff sheets: n/a
Estimated system annual revenue effect (%): n	1/a
Estimated system average rate effect (%): n/a	
When rates are affected by AL, include attact (residential, small commercial, large C/I, agric	nment in AL showing average rate effects on customer classes ultural, lighting).
Tariff schedules affected: n/a	
Service affected and changes proposed n/a	
Pending advice letters that revise the same ta	riff sheets: n/a

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

California Public Utilities Commission Energy Division Tariff Unit Email: EDTariffUnit@cpuc.ca.gov Contact Name: Stephen Gunther

Title: Regulatory Manager

Utility/Entity Name: San Diego Community Power

Telephone (xxx) xxx-xxxx: (619) 657-0419

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CPUC Energy Division Tariff Unit 505 Van Ness Avenue San Francisco, CA 94102

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	

April 1, 2025

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

SDCP Advice Letter 32-E

RE: San Diego Community Power's Disadvantaged Communities Green Tariff Program Budget Estimates for Program Year 2026

Pursuant to the California Public Utilities Commission's ("Commission") Resolution E-4999, Resolution E-5246² and Decision ("D.")24-05-065, 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") program for Program Year ("PR") 2026.

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.2, Resolution E-4999, Resolution E-5246, and D.24-05-065, this AL is submitted with a Tier 2 designation.

EFFECTIVE DATE

Pursuant to GO 96-B, Energy Industry Rule 7.3.4, SDCP requests that this AL become effective on May 1, 2025, which is 30 days after the date of its submittal.

BACKGROUND

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 ("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 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 submit 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

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

See Resolution E-5146 at 15 (OPs 5 and 6).

³ See D.24-05-065 at OP 2 and 3.4 See SDCP AL 10-E available at https://sdcommunitypower.org/wp-content/uploads/2023/01/Final-SDCP-AL-0010-DAC-GT-CSGT-Implementation-AL.pdf.

Tier 3 advice letter. Resolution E-4999 further stipulates that such advice letters must be submitted on or before January 1, 2021 or the capacity allocated to the CCA will be reverted to an investor-owned utility (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 submitted its Tier 3 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 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." Moreover, Resolution E-5246 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. Resolution E-4999 provides similar reporting and budgeting requirements and outlines the descriptions to be provided for each budget line item. On June 7, 2024, the Commission issued D.24-05-065 discontinuing the CSGT and transferring all remaining unprocured capacity assigned to this tariff to a modified DAC-GT. As such, SDCP's budget forecast reflect the discontinuation of CSGT and modifications to DAC-GT. Among the modifications to DAC-GT, D.24-05-065 revised the submission date of the DAC-GT Program Administrators' annual budget advice letters from February 1st to April 1st to allow for improved accuracy in tracking costs. Accordingly, SDCP submits this Tier 2 AL in compliance with Resolution E-4999, Resolution E-5245, and D.24-05-065, and submits the annual budget estimate detailed herein for Commission approval.

In this program budget, SDCP includes both the budget reconciliation for the previous PY (i.e., PY 2024) and the budget forecast for the fourth PY (i.e., PY 2026). In addition to budget reconciliation and forecast, annual program budget submissions must also include details on program capacity and customer enrollment numbers. More specifically, reports on:

- Existing solar generation capacity at previous PY's close (i.e., March 20, 2025);
- Forecasted solar generation capacity under contract for procurement in the upcoming PY:
- Customers served at previous PY's close (i.e., March 20, 2025); and
- Forecasted customer enrollment for the upcoming PY (i.e., PY 2026).

See SDCP AL 10-E available at https://sdcommunitypower.org/wp-content/uploads/2023/01/Final-SDCP-AL-0010-DAC-GT-CSGT-Implementation-AL.pdf.

⁵ Resolution E-5246 at 8.

⁶ Id. at OPs 5 and 6.

⁷ See Resolution E-4999 at 8 and OPs 2-4.

⁸ See D.24-05-065 at OP 2 and 3.

⁹ Id. at 134 and OP 3(i).

DISCUSSION

1. PY 2024 Unspent Balance

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

Table 1. SDCP's Approved PY 2023 and PY 2024 Budgets

Category				DAC-GT						CSGT	
Category		2023		2024		Total		2023		2024	Total
Generation Cost Delta	\$	-	\$		\$		\$	-	\$		\$ -
20% Bill Discount	\$		5	- 3	5	-	\$	-	S		\$ -
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 Adr	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 Progran	n To	tal	VC+	100000000000000000000000000000000000000	223		\$ 1,336,500

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

Table 2. SDCP's PY 2024 Expenses and Unspent Balance

	DAC-GT
Generation Cost Delta ¹⁰	\$0
20% Bill Discount	\$0
Program Administration	\$237,305
Marketing, Education & Outreach	\$352
PY 2024 Actual Expenses Total	\$237,658
PY 2024 Approved Program Budget	\$379,500
PY 2024 Unspent Balance	(\$141,842)

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 PY 2024 as of the date of this AL.¹¹

2. Program Budget Estimates for PY 2026

For PY 2026, SDCP is proposing a total budget of \$477,130 for the DAC-GT. 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 202612

Category	DAC-GT
Generation Cost Delta	\$0
20% Bill Discount	\$0
Program Administration	\$461,132
Marketing, Education & Outreach	\$15,998
PY 2026 Forecast Expenses Total	\$477,130

a. Budget Details

Resolution E-4999 requires that annual budget submissions include the following:13

- 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 and

[&]quot;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.)

All hourly rates are fully loaded rates. Average fully loaded hourly rates for SDCP employees are for 2026. This includes a 3.80 percent Consumer Price Index, 5 percent merit increase, variable fringe, and 44.86 percent Indirect Cost Allocation Plan.

See Resolution E-4999 at 67 (OP 2).

executed its first power purchase agreement ("PPA") on February 19, 2025. A SDCP anticipates finalizing a second PPA in June 2025. SDCP conservatively anticipates not having a new DAC-GT permanent resource online in 2027 due to lead times of permitting, construction, and interconnection processes, and therefore does not forecast a generation cost delta for the program as it cannot be served with an interim resource. However, if expedited timelines result in projects successfully coming online in late 2026, SDCP will coordinate with the Energy Division and submit a supplement to this AL, as necessary.

The Above Market Generation Costs for the DAC-GT program in PY 2026 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 Generation Costs in PY 2026 are summarized in Table 4.

Table 4: SDCP's Estimated Above Market Generation Costs for DAC-GT for PY 2026

	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

ii. 20 Percent Bill Discount

As described in this AL, 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 2026 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 & Electric Company ("SDG&E"). SDCP's PY 2026 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 2027. The budget estimates will be based on forecasted monthly enrollment in the DAC-GT program and average monthly California Alternate Rates for Energy ("CARE") customer bills in SDCP's service territory.

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See SDCP AL 31-E available at https://sdcommunitypower.org/wp-content/uploads/2025/03/SDCP-Advice-Letter-31-E Public- FINAL.pdf.

Table 5: SDCP's Estimated 20 Percent Bill Discount Costs for DAC-GT for PY 2026

Category	DAC-GT
Total New Customer Enrollment PY 2026	0
Cumulative Customers Enrolled	0
20 Percent Bill Discount	\$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. 15 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. 16

For PY 2026, SDCP estimates total Program Administration Costs of \$461,132 for DAC-GT, which is 96% of the total DAC-GT budget of \$477,130.

The percentage of the DAC-GT Program Administration budget compared to the overall program budgets is currently higher than the 10 percent cap because SDCP anticipates no enrollment for the DAC-GT program in PY 2026, and therefore the total program budget for PY 2026 does not include fully enrolled costs for the 20 Percent Bill Discount or Above Market Generation Costs. The Commission 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." 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. SDCP requests that the Commission apply 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 6 shows the total proposed Program Administration Costs for the DAC-GT program for PY 2026, and the estimates are discussed in further detail as follows.

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

¹⁶ See Resolution E-5125 at 6-7.

¹⁷ Id. at 6-7.

¹⁸ Id. at 7

Table 6: SDCP's Proposed Program Administration Budget for DAC-GT for PY 2026

Category	DAC-GT	
Program Management	\$247,197	
Information Technology	\$44,859	
Billing Operations	\$58,693	
Regulatory Compliance	\$6,117	
Procurement	\$104,266	
Total	\$461,132	

1. Program Management

SDCP estimates program management costs of \$247,197 in PY 2026 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 7 shows the details of the program management budget proposed for PY 2026.

Table 7: Program Management Budget Details for PY 2026

Position	2026 Fully Burdened Hourly Rate	2026 Hours	2026 Total Labor Spend
Senior Program Associate	\$143	1,664	\$238,013
Senior Programs Manager	\$192	24	\$4,602
Director of Programs	\$224	12	\$2,684
Financial Analyst	\$125	6	\$747
Senior Finance Manager	\$192	6	\$1,151
Total		1,712	\$247,197

2. Information Technology (IT)

SDCP estimates costs of \$44,859 for the DAC-GT program. 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 the DAC-GT program, 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 \$8,693 for the DAC-GT program in PY 2026 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 as set forth in Table 8.

Table 8: Billing Operations Budget Details for PY 2026

Position	2026 Fully Burdened Hourly Rate	2026 Hours	2026 Total Labor Spend
Account Services Analyst	\$125	30	\$3,737
Account Services Manager	\$165	30	\$4,956
Sr. Data and Systems Analyst	\$143	30	\$4,291
Total		90	\$8,693

4. Regulatory Compliance

SDCP estimates a total regulatory compliance cost of \$6,117 for the DAC-GT program for staff time to develop Advice Letters and ensure regulatory compliance. Regulatory compliance costs are set forth in Table 9.

Table 9: Regulatory Budget Details for PY 2026

Category	DAC-GT		
Advice Letter Development	\$6,117		
Total	\$6,117		

5. Procurement

SDCP estimates total procurement costs of \$104,266 for the DAC-GT program 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.

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Table 10: Procurement Budget Details for PY 2026

Position	2026 Fully Burdened Hourly Rate	2026 Hours	2026 Total Labor Spend
Senior Local Development Manager	\$192	497	\$95,306
Senior Portfolio Manager	\$192	12	\$2,301
Director of Power Contracts	\$224	12	\$2,684
Managing Director Power Services	\$331	12	\$3,975
Total		533	\$104,266

iv. ME&O Costs

For PY 2026, SDCP estimates total ME&O costs of \$15,998 for the DAC-GT program, which is 5 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.¹⁹ A detailed account of the PY 2026 ME&O labor Costs is available in Table 11 below.

Table 11: SDCP's Proposed ME&O Budget (Labor) for DAC-GT for PY 2026

Position	2026 Fully Burdened Hourly Rate	2026 Hours	2026 Total Labor Spend	
Senior Marketing Manager	\$192	12	\$2,301	
Digital Media Coordinator	\$113	12	\$1,350	
Community Engagement Manager	\$165	20	\$3,304	
Public Outreach Coordinator	\$113	12	\$1,350	
Public Outreach Coordinator	\$113	12	\$1,350	
Director of Public Affairs	\$224	6	\$1,342	
Total		74	\$10,998	

A detailed account of the PY 2026 outreach costs (\$5,000) is outlined in Table 12.

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

Table 12: SDCP's Proposed ME&O Budget (Outreach) for DAC-GT for PY 2026

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

The percentage of the DAC-GT ME&O Costs is 5% 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 three 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.

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." Table 12 provides this information for the PY 2026 budget.

Resolution E-4999 at 27.

Table 12: SDCP's Program Existing and Forecasted Capacity Details for PY 2026

Program Detail	DAG	C-GT
	PY 2025	PY 2026
Existing Capacity at beginning of period ²¹	0 MW	0 MW
Incremental Capacity targeted for procurement	0 MW	0 MW
Number of customers served at beginning of PY	0	0
Number of additional customer enrollments estimated	0	0
Total customer load	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 2026 program budget in SDG&E's 2026 ERRA Forecast application. 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.²²

CONCLUSION

For the reasons stated in this AL, SDCP requests approval of its PY 2026 budget for its DAC-GT program. In accordance with Resolution E-5125 and for the reasons discussed herein, SDCP further requests that its PY 2026 budget 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 Program Budget Workpapers

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

22 See Resolution E-4999 at 26-27.

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: EDTariffUnit@cpuc.ca.gov

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
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San Diego, CA 92112
sgunther@sdcommunitypower.org

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.

CONCLUSION

SDCP respectfully requests that the Commission approve SDCP's 2026 budget forecast and ME&O plan.

Stephen Gunther

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Copy (via e-mail): Service List – R.14-07-002

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APPENDIX A



Marketing Education and Outreach Plan for the Disadvantaged Communities Green Tariff Program for Program Year 2026

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:

- · Enroll eligible customers in the DAC-GT program;
- Increase awareness of and enrollment in California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) discount programs;
- Build 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 DACs 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 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 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

Given enrollment specifications around the program, the primary target audience for the ME&O strategy are customers living in DACs per CalEnviroScreen 4.0²³. SDCP's service area includes customers in the following neighborhoods²⁴:

Figure 1: Qualifying Neighborhoods in SDCP Service Territory.

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	92105	San Diego
6073003502	San Diego	92113	San Diego
6073004800	San Diego	92102	San Diego
6073011601	National City	91950	San Diego
6073011801	National City	91950	San Diego
6073011602	National City	91950	San Diego

²³ 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.

4.0/

²⁴ 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-

6073011802	National City	91950	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
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:

- Achieving diverse and meaningful engagement with developers that reflect the demographics and interests of DACs;
 - Present to public and stakeholder Groups
 - · Chambers of Commerce
 - School Districts
 - Energy Groups/Coalitions
 - Host informational webinars on the solicitation process
 - Host in-person and/or virtual cross-sector collaborative workshops for developers
 - Create and update interested parties list
 - Encourage member agency engagement via regular monthly meetings

- 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 webpage 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

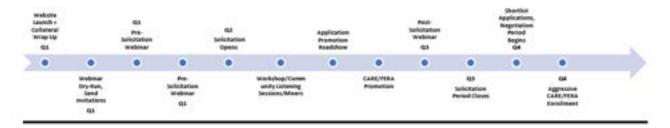
4.2 Outreach Objective

SDCP will develop and implement a targeted customer ME&O campaign to ensure potential customers in DACs, are aware of the opportunity to benefit from the DAC-GT (Solar Advantage program).

4.3 Outreach Goals

- Increase awareness of and enrollment in CARE and FERA discount programs;
- Auto-enroll eligible customers in the DAC-GT programs (expected in 2027);
- Build 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 DACs and hard-to-reach customers is accessible and equitable.

4.4 Phase I Engagement Strategy Timeline:



- Q1 2026 Website updates and collateral wrap-up
- Q1 2026 Webinar development and email invitations
- Q1 2026 Pre-RFO Webinar 1
- Q1 2026 Pre-RFO Webinar 2
- Q1 Q2 2026
 - · Targeted outreach for application promotion
 - Technical engagement with developers
 - Schedule additional post-RFO 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

Q2 2026 - RFO opens

Q2 2026- Post-RFO webinar

Q3 2026 - Solicitation period closes

Q4 2026 - Shortlist applications, winning bid selected, negotiation period begins

PY 2026 - Outreach goals and objective implementation

Phase I	Solicitation (audience: Developers)
Phase II	Project implementation (audience: SDCP Customers)

4.5 Program Engagement and Outreach Strategies by Audience

- Inform and empower Developers through the solicitation process
- Promote program adoption from eligible SDCP Customers
 - Increase interest from those yet to be enrolled in CARE/FERA
 - Engage and promote program adoption for those already enrolled in CARE/FERA
- Consult and work with potential direct outreach partners
- Collaborate with community ambassadors
 - Community Advisory Committee (CAC) members
 - Member Agency Environmental Sustainability Commissions and other environmental groups
 - Member Agency elected/operational staff
 - Community planning groups
- Educate and inform the general public outside of DACs

4.6 Outreach Strategy Pillars

Phase I Action Items:

I. Customer Identification

Identify customers who meet the proposed auto-enrollment criteria for DAC-GT through ArcGIS Consultant (Quartic) by Q1 2026.

II. Communications and Media (Provide Informational Materials)

Develop and send program collateral for Solar Developers and for solicitation

- · Fliers/FAQs/fact sheets/presentation recordings and slides
- Email invites for webinars
- Update our dedicated webpage on SDCP's website to reflect accurate solicitation timeline and requirements
- Identify most spoken languages in Zip-Codes
- Develop marketing plan and collateral for CARE/FERA enrollment ahead of Solar Advantage customer auto-enrollment

III. Tactics:

- Fliers/FAQs/fact sheets/presentation recordings and slides
- Online Ads
- Social Media Content
- Radio Outreach
- Videos
- A/B message testing for CARE/FERA collateral by end of 2026
- Develop toolkit by Q1 2026 with:
 - o FAQ
 - 5-slide presentation on program/how to engage audiences
 - Translate all collateral to include culturally competent and effective messaging by Q2 2026
 - A/B message testing for CARE/FERA collaterals by Q2 2026
- Host Solar Developer webinars

IV. Grassroots Outreach (Activate Community Leadership to Expand Outreach Capacity, Pursue Boothing Opportunities)

Identify community events to engage directly with community members in DAC neighborhoods (near public transportation, ADA accessible)

- · Family markets
- Swap meets
- Libraries
- Resource fairs
- Sporting events
- Identify, engage with and educate community ambassadors by providing a 20minute pitch to include a FAQ, 5-slide presentation on the program/how to engage audiences/develop toolkit by Q1 2026
 - CAC Members
 - Member Agency Environmental Sustainability Commissions and other environmental groups
 - Member Agency elected/operational staff

Community planning groups

V. Tracking Outcomes and Program Participation

- Total number of enrollees in DAC-GT
- Total number of customers reached
- · Email click-through and open rates
- · Website visits and webpage views, social media engagement and impressions
- · Total number of events and distribution of events by neighborhood
- Increased customer awareness of energy use, savings and other customer incentives, rate options, discounts, or programs
- · Track events, attendees and diversity in:
 - o Race
 - o Age
 - Income
- Total CARE and FERA enrollment achieved through DAC-GT outreach;
- Qualitatively measure program accessibility and satisfaction
 - Surveys

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

APPENDIX B

DAC-GT Budget Request

True-up PY 2024 Forecast PY 2026

1. Budget Forecast PY 2026

Tab	Category		DAC-GT
1	Generation Cost Delta	\$	
2	20% Bill Discount	\$	
	Program Administration		
3a	Program Management	5	247,197
3b	Information Technology	5	44,859
3c	Billing Operations	\$	58,693
3d	Regulatory Compliance	\$	6,117
3e	Procurement	S	104,266
****	Subtotal Program Administration	5	461,132
	Marketing, Education & Outreach	100	-
4a	Labor Costs	\$	10,998
4b	Outreach and Material Costs	\$	5,000
	Subtotal ME&O	5	15,998
	Total	\$	477,130

3. Budget Reconciliation PY 2024

automatically calculates, do not touch

Tab	Category	DAC-GT					
			Forecast		Actual		True-up
1	Generation Cost Delta	\$		\$		\$	20
2	20% Bill Discount	\$		\$		\$	80
	Program Administration	8	- 3	8	9	8	
3a	Program Management	\$	234,000	\$	137,681	\$	96,319
3b	Information Technology	\$	15,000	\$	42,723	\$	(27,723)
3c	Billing Operations	\$	18,000	\$	2,852	\$	15,148
3d	Regulatory Compliance	\$	7,500	\$	9,846	\$	(2,346)
3e	Procurement	\$	75,000	\$	44,204	\$	30,796
1	Subtotal Program Administration	\$	349,500	\$	237,305	\$	112,195
	Marketing, Education & Outreach						
4a	Labor Costs	\$	30,000	\$	352	\$	29,648
4b	Outreach and Material Costs	5	54	\$	32	\$	-
4c	Local CBO/ Sponsor Costs	\$		\$		\$	90
	Subtotal ME&O	\$	30,000	\$	352	\$	29,648
Q E	Total	\$	379,500	\$	237,658	\$	141,842

4. Final PY 2026 Budget Request

Budget forecast for upcoming PY (in line 21) plus/minus true-up amount from previous PY (in line 42)

(i)	DAC-	GT
Budget Carry-over from PY 2024	\$	(141,842)
Budget Forecast for PY 2026	\$	477,130
TOTAL	\$	335,287

Program Procurement & Customer Enrollment

Participating customer count is based on number of customers enrolled in the program at the end of 2024.

Existing Capacity & Customer Enrollment PY 2024

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

Forecasted Capacity & Customer Enrollment PY 2026

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

3a. FORECAST: Program Management 2026

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

All hourly rates are fully loaded nates. Average fully loaded hourly rates for SDCP employees are 5 for 2026. This includes a 3.80 percent CPI, 5 percent merit increase, variable fringe, and 44.86 percent Indirect Cost Allocation Plan ("ICAP").

LABOR COSTS

DAC-GT

Position	Rafe	Bur	fully idened rly Rate	Hours	Total Labor Spend	Notes
L	Program development and management, budgeting, reporting	s	143	1664	\$238,013	80% of staff time
Sr. Program Manager	Program oversight	5	192	24	\$4,602	
Director of Programs	Staff oversight	5	224	12	\$2,684	
Financial Analyst	Budgeting	5	125	6	5747	
Sr. Finance Manager	Budgeting Oversight	5	192	6	\$1,151	
Total		-	11,000	1712	\$247,197	1

DIRECT COSTS

COST CATEORIES	DAC-GT	
None	\$	7
TOTAL	S	(1)

DAC-GT \$247,1	97
----------------	----

3b. FORECAST: Information Technology 2026

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 2026. This includes a 3.80 percent CPI, 5 percent merit increase, variable fringe, and 44.86 percent Indirect Cost Allocation Plan (*ICAL Direct costs include a 5% contingency buffer.

LABOR COSTS

DAC-GT

Position	Role	Hourly Rate	Hours	Total Labor Spend	Notes
None		5 -		\$.	
Total				5 -	

DIRECT COSTS

COST CATEORIES	TOTAL COSTS		DAC-GT	
COST CATEORIES Harvest	S	5,065	5	5,065
Quartic	5	39,043	5	39,043
ArcG/S TOTAL	5	751	5	751
TOTAL	S	44,859	5	44,859

DAC-GT	\$ 44,859
The state of the s	The state of the s

3c. FORECAST: Billing Operations 2026

Costs for ongoing billing operations and customer support

All hourly rates are fully loaded trates. Average fully loaded hourly rates for SDCP employees are \$ for 2026. This includes a 3.80 percent CPI, 5 percent merit increase, variable fringe, and 44.86 percent indirect Cost Allocation Plan ("ICAP").

LABOR COSTS

DAC-GT

Position	Role	Fully Burdened Hourly Rate	Hours	Total Labor Spend	Notes
Account Services Analyst	Data analysis as needed for billing	\$125	30	\$3,737	
Account Services Manager	Vendor Mgmt/customer support	\$165	30	\$4,956	
Sr. Data and Systems Analyst	Data analysis as needed for billing	\$143	30	\$4,291	
Total		0 87740	90	\$8,693	

DIRECT COSTS

COST CATEORIES	TOTAL COSTS		DAC-GT	
Calpine billing support	\$	50,000	5	50,000
TOTAL	\$	50,000	5	50,000

DAC-GT	\$58,693

3d. FORECAST: Regulatory Compliance 2026

Ongoing cost for regulatory compliance.

All hourly rates are fully loaded rates. Average fully loaded hourly rates for SDCP employees are \$ for 2026. This includes a 3.80 percent CPI, 5 percent merit increase, variable fringe, and 44.86 percent indirect Cost Allocation Plan ("ICAP").

LABOR COSTS

DAC-GT

Position	Role	Fully Burdened Hourly Rate	Hours	Total Labor Spend	Notes
Sr. Regulatory Analyst	Regulatory support for programs	5143	24	\$3,433	3
Director of Regulatory & Legislative Affairs	Regulatory and programmatic guidance	\$224	12	\$2,684	
Total	8	3	36	\$6,117	

DIRECT COSTS

COST CATEORIES	TOTAL COSTS	
None	\$ -	5 -
TOTAL	\$	5

DAC-GT	\$ 6,117

3e. FORECAST: Procurement Costs 2026

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 5 for 2026. This includes a 3.80 percent CPL 5 percent merit increase, variable fringe, and 44.86 percent Indirect Cost Allocation Plan (*TICAF*).

LABOR COSTS

DAC-GT

Position	Role	Fully Burdened Hourly Rate	Hours	Total Labor Spend	Notes
Sr. Local Development Manager	PPA evaluations, reporting & operations	\$192	497	\$95,306	
Sr. Portfolio Manager	Contract management oversight & reporting	\$192	12	\$2,301	
Director of Power Contracts	Contract management oversight & reporting	\$224	12	\$2,684	
Managing Director Power Services	Staffoversight	\$331	12	\$3,975	
Total		6	533	\$104,266	

DIRECT COSTS

COST CATEORIES	TOTAL COSTS (\$)	DAC-GT
None	harry range 2	S12 100 G
TOTAL	0	\$ -

and the same of th	
DAC-GT	\$104,266

ACTUALS: Admin Costs 2024

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 B	Illing Ops	3.4	Regulatory	3.el	Procurement	TOT	AL.
03/20/24	\$ 6,202.85	S	- 1	\$	356.73	5	370.54	5	1,498.01	5	8,428.13
April	\$ 9,759.38	S		5	85.76	5	635.21	5	3,424.03	5	13,904.38
May	\$ 12,478.83	5	14.	5	870	5	238.20	5	2,568.02	5	15,285.05
June	\$ 12,541.39	5		5	900	5	714.61	5	2,568.02	\$	15,824.02
July	\$ 16,563.16	S		5		\$	1,826.24	5	2,140.02	5	20,529.42
Aug	\$ 14,109.97	S		\$	486.98	5	1,032.22	5	2,889.02	\$	18,518.19
Sept	\$ 13,493.74	S	1.00	5	526.11	.5	1,429.23	5	2,782.02	5	18,231.10
Oct	5 14,969.41	5		5	606.93	5	476.41	5	4,664.10	5	20,716.85
Nov	\$ 7,118.72	5	+	5	263.06	5	317.61	\$	3,728.06	5	11,427.44
Dec	\$ 5,031.51	5	7.4	\$.	263.06	\$	476.41	\$	1,374.04	\$	7,145.02
January	\$ 13,134.80	5	- 2-1	5	263.06	5	794.02	5	8,158.17	5	22,350.04
February	\$ 11,049.94	S	- 1	\$	4.0	5	794.02	5	5,414.07	5	17,258.03
03/19/25	\$ 1,227.77			5	* 2	5	741.08	5	2,996.02	5	4,964.88
Total	\$ 137,681.49	\$	*/	\$	2,851.67	\$	9,845.79	\$	44,203.60	5	194,582.55

Direct Costs

Program Management D	irect Costs	
Item	DAC-GT	
None	\$	-
TOTAL	\$	

Information Technology Direct Costs						
Item	DAC-	DAC-GT				
Harvest	\$	4,824.00				
Quartic	5	37,183.67				
ArcGIS	\$	715.00				
TOTAL	3	42,722.67				

Billing Ops Direct Costs	
Item	DAC-GT
None	\$
TOTAL	\$.

Regulatory Compliance	Direct Costs	
Item	DAC-GT	
None		
TOTAL	Š	

Procurement Direct Costs		
Item	DAC-GT	
None	5	11/2
TOTAL	5	- 4

TOTAL	 42 722 67

Total Costs

Category	DAC-GT			
Program Management	5	137,681.49		
Information Technology	5	42,722.67		
Billing Operations	\$	2,851.67		
Regulatory Compliance	5	9,845.79		
Procurement	5	44,203.60		
TOTAL	\$	237,305.22		

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 2026. This includes a 3.80 percent CPI, 5 percent ment increase, variable fringe, and 44.86 percent indirect Cost Allocation Plan ("ICAP").

LABOR COSTS

DAC-GT

Position	Role	Fully Burdened Hourly Rate	Hours	Total Labor Spend	Notes
Sr. Marketing Manager	Material development	\$192	12	\$2,301	
Digital Media Coordinator	finail marketing/website updates	\$113	12	\$1,350	
Community Engagement Manager	ME& O management	\$165	20	\$3,304	
Public Outreach Coordinator	Outreach	\$113	12	\$1,350	
Public Outreach Coordinator	Outreach	\$113	12	\$1,350	
Director of Public Affairs	Staff oversight	\$224	6	\$1,342	
Total	7/1 2		74	\$10,998	

DIRECT COSTS

Tab	ME&O Delivery Method	DAC-GT
Outreach & Material Costs	7.7	
1	Targeted Marketing/Advertising	\$ 3,700
2	Website-digital content.	\$ 1,300
Total	- 1 V	\$ 5,000

TOTAL COSTS

DAC-GT	\$15,998

Back-up Details

DAC-GT ME&O Costs	2025	
Targeted Marketing		
Digital ads	\$	200
Digital creative development & production	5	1,000
Flyers/fact sheets printing	5	500
Translation services	5	2,000
TOTAL	\$	3,700
Website	2	(0.0)
DAC-GT web page	5	1,000
Web page translations	\$	300
TOTAL	\$	1,300
DAC-GT TOTAL	\$	5,000

ACTUALS: ME&O Costs 2024

Labor Costs

10 0 12	DAC-GT	
03/20/24	\$	2
April	\$	+
May	\$	-
June	\$	
July	\$	-
Aug	\$	÷
Sept	\$	148.43
Oct	\$	
Nov	\$	2
Dec	\$	40
Jan	\$	-
Feb	\$	58.28
03/19/25	\$	145.71
Total	\$	352.42

Direct Costs

Item	DAC-GT	DAC-GT	
N/A	\$		

TOTAL	\$ -
The second secon	

Total Costs

DAC-GT	\$	352.42
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