



July 8, 2024

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

PCE Advice Letter 35-E

**RE: PENINSULA CLEAN ENERGY AUTHORITY 2025 BUDGET REQUEST AND
OUTREACH PLAN FOR THE DISADVANTAGED COMMUNITIES GREEN
TARIFF AND COMMUNITY SOLAR GREEN TARIFF PROGRAM (Public Version)**

PURPOSE

Peninsula Clean Energy Authority (“PCE”) hereby submits to the California Public Utilities Commission (“Commission” or “CPUC”) this advice letter (“AL”) for approval of its program budget estimates and marketing, education, and outreach (“ME&O”) plan for PCE’s 2025 Disadvantaged Community Green Tariff (“DAC-GT”) and Community Solar Green Tariff (“CSGT”) program.

TIER DESIGNATION

Pursuant to General Order (“GO”) 96-B, Energy Industry Rule 5.2, and Ordering Paragraph (“OP”) 2 of Resolution E-5125, this AL is submitted with a Tier 2 designation.

EFFECTIVE DATE

Pursuant to General Order 96-B and General Rule 7.3.4, PCE requests that this Tier 2 AL become effective 30 days following submittal, which is August 7, 2024.

BACKGROUND

On June 22, 2018, the Commission issued Decision (“D.”) 18-06-027 adopting three new programs to promote the installation of renewable generation among residential customers in disadvantaged

communities (“DACs”),¹ as directed by the California Legislature in Assembly Bill (“AB”) 327.² The three programs include the DAC Single Family Solar Homes (“DAC-SASH”) program, which provides up-front incentives for the installation of solar at low-income homes in DACs. The other two programs, the DAC-GT and the Community Solar Green Tariff (“CSGT”) programs, are community solar programs that offer 100% renewable energy to residential customers and provide a 20% discount on the electricity portion of the customers’ bills.

Pursuant to D.18-06-027, Community Choice Aggregators (“CCAs”) may also develop and implement their own DAC-GT and CSGT programs.³ D.18-06-027 provides that CCAs must submit a Tier 3 AL to implement the CCA DAC-GT and CSGT programs (“Implementation AL”).⁴ Accordingly, PCE submitted its Tier 3 Implementation AL on December 22, 2020 to create DAC-GT and CSGT programs (PCE AL 11-E). On April 15, 2021, the Commission issued Resolution E-5124, which approved PCE’s DAC-GT and CSGT Implementation AL with modifications.⁵

On December 9, 2022, PCE submitted jointly with PG&E AL 27-E, *True-Up of Capacity Transfer Under The Disadvantaged Communities Green Tariff Program to Accommodate Service to The City of Los Banos* which proposed that there be no true-up of the capacity transferred to PCE under AL-15-E to minimize administrative complexity in the delivery of the DAC-GT program and it’s benefits to participants and enable that capacity to be procured more quickly and begin delivering benefits to PCE’s DAC-GT participants. This proposal effectively set PCE’s total DAC-GT program capacity at 3.74 MW. The Energy Division approved AL 27-E on January 08, 2023.

Resolution E-4999 established the procedures and timelines for submitting annual DAC-GT and CSGT program budget requests and ME&O plans for the upcoming program year.⁶ Per Resolution E-4999, the deadline for submitting annual DAC-GT and CSGT program budget requests is February 1st of each year.⁷ On December 4, 2023, PCE along with the Joint Community Choice Aggregators (“CCAs”) 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.

¹ DACs are defined under D.18-06-027 as communities that are identified in the CalEnviroScreen 3.0 as among the top 25 percent of census tracts statewide, plus the census tracts in the highest five percent of CalEnviroScreen’s Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data. Resolution E-4999 clarified that Program Administrators must submit a Tier 1 AL to update program eligibility rules within 30 days of a new release of the CalEnviroScreen tool. PCE satisfied this requirement by submitting PCE AL 18-E on November 12, 2021, reflecting the release of CalEnviroScreen 4.0.

² AB 327 (Perea), Stats. 2013, ch 611.

³ D.18-06-027 at 104 (OP 17).

⁴ *Id.*

⁵ Resolution E-5124 at 32 (OP 1).

⁶ Resolution E-4999 at 67 (OP 2).

⁷ *Id.*

On June 7, 2024, the Commission issued D.24-05-065 (“Decision”) which made several modifications to the DAC-GT and CSGT programs. The Decision discontinued the CSGT programs, and any program capacity was consolidated into the DAC-GT program. The Decision also allocated additional DAC-GT program capacity. As a result of these two modifications, PCE's DAC-GT program capacity increased from 3.37 MW to 6.0125 MW.

PROGRAM YEAR 2025 BUDGET

PCE hereby submits its budget request for program year (“PY”) 2025 for the DAC-GT and CSGT programs. Per Resolution E-4999, the budget request covers the budget reconciliation for the previously concluded PY for the DAC-GT and the Community Solar Green Tariff Program (i.e., PY 2023) and the budget forecast for the upcoming PY (i.e., PY 2025). PCE requests a total budget of **\$1,312,362.67** for the DAC-GT program for PY 2025. Additional details can be found in Appendix A.

The table below represents the forecasted DAC-GT PY 2025 Program Administration and ME&O costs as a percent of the total forecasted budget.

% of Total 2025 PY DAC-GT Budget		
<u>Program Administration</u>	<u>Max 10% of total budget after start-up years</u>	<u>6%</u>
<u>ME&O</u>	<u>Max 4% of total budget after start-up years</u>	<u>1%</u>

CCA INTEGRATION COSTS

On March 2, 2023, PG&E submitted AL 6872-E, Public Policy Charge Balancing Account Tariff Modification for Disadvantaged Communities Green Tariff Programs, to request a tariff modification to its Public Policy Charge Balancing Account which will allow PG&E to record various administration expenses it incurs related to CCA DAC-GT and CSGT programs, including CCA integration costs that have previously been captured within the individual CCA’s annual budget requests.

Accordingly, and as anticipated in PCE AL 30-E-A, PCE’s 2025 PY budget does not include a line item for new CCA integration costs as such costs will instead be reflected in PG&E’s DAC Program Budget Advice Letter. However, PCE has included CCA integration costs in the calculation of the true up of the 2023 PY costs as those costs were approved as part of the 2023 PY budget.

APPENDICES

The following appendices are included as a part of this AL:

1. Appendix A: Disadvantaged Communities Green Tariff Program Budget Forecast for Program Year 2025;
2. Appendix B: Projected Marketing Education and Outreach Plan for the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs for Program Year 2025; and
3. Confidential Appendix C: Workpapers supporting the calculation of the generation cost delta and the 20% bill discount.

REQUEST FOR CONFIDENTIAL TREATMENT

In support of this AL, PCE provides certain confidential information that is contained in Confidential Appendix C, which includes protected market sensitive/competitive data and corporate financial records. PCE requests confidential treatment of this information and provides the basis for this request in a confidentiality declaration submitted concurrently with this AL. The confidential information can be made available to non-market participants as required by D.20-07-005 after they have executed a nondisclosure agreement with PCE. To execute a nondisclosure agreement, please contact Jeremy Waen at jwaen@peninsulacleanenergy.com.

CONCLUSION

PCE respectfully requests that the Commission approve PCE's PY 2025 budget forecast and ME&O plan proposed herein and direct PG&E to transfer funds sufficient to meet PCE's approved annual budgets.

NOTICE

A copy of this AL is being served on the consolidated, official Commission service list for Rulemaking ("R.") 14-07-002 and Application ("A.") 22-05-022.

For changes to this service list, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

PROTESTS

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

CPUC, Energy Division
Attention: Tariff Unit
Email: EDTariffUnit@cpuc.ca.gov

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

Zsuzsanna Klara
Regulatory Compliance Analyst
Peninsula Clean Energy Authority
2075 Woodside Road
Redwood City, CA 94061
Email: zklara@peninsulacleanenergy.com

There are no restrictions on who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

CORRESPONDENCE

For questions regarding this AL, please contact Zsuzsanna Klara by electronic mail at zklara@peninsulacleanenergy.com.

/s/ Jeremy Waen

Jeremy Waen
Senior Director, Regulatory Policy
Peninsula Clean Energy Authority

cc: Service List: R.14-07-002 and A.22-05-022

Declaration of Jeremy Waen Supporting Confidentiality Claim for Submission of Peninsula Clean Energy Authority Advice Letter 35-E, Peninsula Clean Energy Authority 2025 Budget Request and Outreach Plan for the Disadvantaged Communities Green Tariff Program

In accordance with General Order 66-D, Decision (“D.”) 06-06-066, D.08-04-023, and D.20-07-005 for the submission of confidential information to the California Public Utilities Commission (“Commission”) in an Advice Letter (“AL”) submission, Peninsula Clean Energy Authority (“PCE”) submits the following declaration in support of its claim of confidentiality for the below-specified information provided in PCE Advice Letter 35-E: *Peninsula Clean Energy Authority 2023 Budget Request and Outreach Plan for the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs* (“PCE AL 35-E”).

The undersigned declares, under penalty of perjury, as follows:

1. In my capacity as the Managing Director of Regulatory Policy, I have knowledge of the information provided in this declaration and am authorized to make this declaration on PCE’s behalf by PCE’s Chief Executive Officer, Jan Pepper.
2. In this Advice Letter Submission, PCE is securely and confidentially uploading the following documents to the Energy Division through the Commission’s File Transfer Protocol (“FTP”) system:
 - a. “PCE AL 35-E – Confidential”
 - b. “PCE Confidentiality Declaration”
3. In this Advice Letter Submission, PCE is publicly submitting the following documents to the Energy Division and the consolidated service list for Rulemaking 14-07-002 and Application 22-05-022 via email:
 - a. “PCE AL 35-E – Public”
 - b. “PCE Confidentiality Declaration”
4. Through this declaration, PCE requests that the “Confidential Appendix C – Workpapers Supporting the Calculation of the Generation Cost Delta and the 20% Bill Discount,” be treated as confidential and kept under seal.
5. This request for confidentiality is being made pursuant to the requirements and authority of Commission Decisions 06-06-066, 08-04-023, and 20-07-005, Commission General Order 66-D, California Civil Code 3426, California Evidence Code 1060, and California Government Code Sections 7927.705, 7922.000.

6. The attached “Table of Confidential Information” identifies the specific information that is subject to this confidentiality request, provides specific citations to the authority upon which each request is based, provides a granular justification for confidential treatment, and specifies the length of time that the information is to be kept confidential.
7. PCE is complying with the limitations on confidentiality specified in the D.06-06-066 Matrix (as amended by subsequent decisions) for the types of data being submitted subject to a request for confidentiality.
8. To the best of my knowledge, the information being submitted subject to this request for confidentiality is not already public.
9. As set forth below, Confidential Appendix C contains confidential and highly market-sensitive supporting documentation for PCE AL 35-E.
10. Confidential Appendix C cannot be aggregated, redacted, summarized, masked, or otherwise protected in a way that allows partial disclosure.
11. The following person is designated as the person for the Commission to contact regarding potential release of this information by the Commission:

Jeremy Waen
Senior Director, Regulatory Policy
Peninsula Clean Energy Authority
2075 Woodside Road
Redwood City, California 94061
jwaen@peninsulacleanenergy.com

Executed on July 8, 2024 at Redwood City, California

 /s/ Jeremy Waen

Jeremy Waen
Senior Director, Regulatory Policy
Peninsula Clean Energy Authority

TABLE OF CONFIDENTIAL INFORMATION

PCE Advice Letter 35-E:

Peninsula Clean Energy Authority 2025 Budget Request and Outreach Plan for the Disadvantaged Communities Green Tariff and
Community Solar Green Tariff Programs

Redaction Reference	Authority For Confidentiality Request	Justification for Confidential Treatment	Length of Time Data To Be Kept Confidential
<p>Confidential Appendix C – Workpapers Supporting the Calculation of the Generation Cost Delta and the 20% Bill Discount</p>	<p>ESP/CCA Matrix, Items II(A), (B)</p> <p>Commission General Order 66-D</p> <p>California Civil Code 3426</p> <p>California Government Code Sections 7927.705, 7922.000</p> <p>California Evidence Code 1060</p>	<p>Appendix C contains information regarding PCE’s forecasted need for energy and resource adequacy capacity. This information falls into the identified protected categories in the ESP/CCA Matrix.</p> <p>Additionally, Appendix C contains information regarding PCE’s market position and price-related information. This information must be protected as market-sensitive and/or trade secret information. Even if no other authority applied to protect this information, the Commission must protect this information because the public interest in protecting the information clearly outweighs the public interest in disclosure. Disclosure here could provide valuable market sensitive information to market participants, erode PCE’s current or future contract negotiations, and create distortions in the resource adequacy and energy markets. In contrast, the public interest is minimal in public disclosure of pricing, forecasting, and procurement data for a single load serving entity.</p>	<p>Under Item II(A), (B), data is confidential for the first 3 years of the forecast period.</p>



APPENDIX A

**Disadvantaged Communities GreenTariff Program and
Community Solar Green Tariff Program Budget Forecast for
Program Year 2025**

Proposed by Peninsula Clean Energy Authority



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1. BACKGROUND

Per Resolution E-4999, estimated budget forecasts must be presented by program and include the following budget line items:¹

1. Generation cost delta,² if any;
2. 20% bill discount for participating customers;
3. Program administration costs, including:
 - a. Program management;
 - b. Information technology (“IT”);
 - c. Billing operations;
 - d. Regulatory compliance; and
 - e. Procurement.
4. Marketing, education, and outreach (“ME&O”) costs, including:
 - a. Labor costs;
 - b. Outreach and material costs; and
 - c. Local Community Based Organization/sponsor costs for the CSGT program
5. Program Evaluation Costs.

In addition to budget forecasts, annual program budget submissions must also include details on program capacity and customer enrollment numbers for both programs. More specifically, Peninsula Clean Energy Authority (“PCE”) must report on:

1. Existing capacity at the close of the previous program year (“PY”);
2. Forecasted capacity for procurement in the upcoming PY;
3. Customers served at the close of the previous PY; and
4. Forecasted customer enrollment for the upcoming PY.

Finally, Confidential Appendix C contains the following information:

1. Workpaper for the calculation of the generation cost delta; and
2. Workpaper for the calculation of the 20% bill discount to participating customers.

For the reasons set forth in the attached declaration of Jeremy Waen, these two workpapers are confidential, not included in the public versions of this Advice Letter, and will only be made available to those who execute a nondisclosure agreement.

Further information on how to execute a nondisclosure agreement can be found in the cover letter of this Advice Letter.

¹ Resolution E-4999 at 67 (Ordering Paragraph (“OP”) 2). A detailed description of each budget line item can be found in PCE’s Implementation Plan, submitted in Appendix A to PCE Advice Letter 11-E submitted on December 22, 2020.

² Resolution E-4999 establishes that *above market* generation costs should include net renewable resource costs in excess of the otherwise applicable class average generation rate that will be used to calculate the customers’ bills. In conversations with the California Public Utility Commission’s (“Commission”) Energy Division after the release of Resolution E-4999, it was clarified that this budget line item is intended to cover both a potential higher, as well as lower, cost of the DAC-GT/CSGT resources than the otherwise applicable class average generation rate. Hence, the term is updated to state the “*Delta of generation costs* between the DAC-GT/CSGT resources and the otherwise applicable class average generation rate.”

Supporting worksheets used in substantiating cost estimates, including direct labor, management and/or supervisor costs, and any vendor costs, along with a breakdown of staff or contractor position descriptions, loaded hourly rates, and total hours anticipated for each task, will be provided if available.

2. BUDGET FORECAST FOR PY 2025

For PY 2025, PCE forecasts a total budget of **\$1,132,159.84** for the Disadvantaged Communities (“DAC-GT”) program. A detailed budget forecast for each program and PY by budget line item can be found in the figure below.

Table 1: Budget forecast for PY 2025

Tab	Category	2025 Forecast	2024 Forecast	2023 Forecast	Total
1	Generation Cost Delta	\$228,153.66	\$777,945.54	\$550,015.39	\$1,556,114.59
2	20% Bill Discount	\$817,503.20	\$474,093.47	\$322,317.27	\$1,613,913.94
	Program Administration				
3a	Program Management	\$4,641.20	\$11,385.00	\$10,125.00	\$26,151.20
3b	Information Technology	\$10,800.00	\$13,735.00	\$13,230.00	\$37,765.00
3c	Billing Operations	\$6,088.16	\$3,544.65	\$3,803.34	\$13,436.15
3d	Regulatory Compliance	\$36,021.64	\$14,272.00	\$8,412.94	\$58,706.58
3e	Procurement	\$13,865.26	\$15,583.00	\$19,906.36	\$49,354.62
3f	CCA Integration	\$-	\$-	\$2,430.00	\$2,430.00
	Subtotal Program Administration	\$71,416.26	\$58,519.65	\$57,907.63	\$187,843.55
4	Marketing, Education & Outreach	\$15,086.72	\$8,335.99	\$7,247.21	\$30,669.92
5	EM&V	\$-	\$-	\$-	\$-
	Total DAC-GT	\$1,132,159.84	\$1,318,894.65	\$937,487.50	\$3,388,542.00

PCE provides the following clarifying notes regarding the budget summary.

Generation Cost Delta

PCE anticipates a new 3.0 MW solar resource to serve its DAC-GT program that is projected to come online prior to the start of PY 2025. PCE plans to continue to use interim resource agreements in place to serve the remainder of the program capacity. The forecasted generation cost delta for the DAC-GT program is the result of a combination of the anticipated permanent resource and the interim resources.

20% Bill Discount

As described further in PCE Advice Letter 14-E and as directed in Resolution E-5124, PCE's 2025 forecasted bill discount costs include both the generation portion of the electric bill as set by PCE as well as the delivery portion of the electric bill as set by Pacific Gas and Electric Company ("PG&E").

The Bill Discount is significantly higher than PCE forecasted for 2023. The main reasons are because of two reasons: First, PCE AL 27-E about Los Banos capacity transfer proposed that there be no true-up of the capacity transferred to PCE under AL-15-E to minimize administrative complexity in the delivery of the DAC-GT program and it's benefits to participants and enable that capacity to be procured more quickly and begin delivering benefits to PCE's DAC-GT participants. This proposal effectively set PCE's total DAC-GT program capacity at 3.74 MW.

The second reason of the change is the Commission's D.24-05-065 ("Decision") which allocated additional DAC-GT program capacity. As a result of these two modifications, PCE's DAC-GT program capacity increased from 3.37 MW to 6.0125 MW.

Program Administration Costs

Program management costs include program development and management, budgeting, and reporting. IT costs include the costs to develop program tools and update existing systems to accommodate program enrollment and billing.

Marketing, Education, and Outreach (ME&O)

PCE's ME&O budget includes costs associated with PCE labor and direct costs for outreach and materials.

CCA Integration Costs

On March 2, 2023, PG&E submitted AL 6872-E, Public Policy Charge Balancing Account Tariff Modification for Disadvantaged Communities Green Tariff Programs, to request a tariff modification to its Public Policy Charge Balancing Account which will allow PG&E to record various administration expenses it incurs related to CCA DAC-GT and CSGT programs, including CCA integration costs that have previously been captured within the individual CCA's annual budget requests.

The previous process for recovering the CCA integration costs as part of the CCA’s budget request has proven to be inefficient and administratively burdensome. Because of this, in AL 30-E-A PCE requested change that streamlined the process for recovering these CCA integration costs applicable to the 2024 PY and beyond.

The new process eliminated the need for each CCA to present its proportional share of the CCA integration costs as a line item in each of their budget advice letters. Instead, the presentation of the CCA integration costs on a forecast or actual basis was included in PG&E’s annual DAC Program Budget Advice letter as a separate distinct line item, and then again in the subsequent ERRA forecast proceeding.

Accordingly, PCE’s 2025 PY budget does not include a line item for new CCA integration costs as such costs will instead be reflected in PG&E’s DAC Program Budget Advice Letter. However, PCE has included CCA integration costs in the calculation of the true up of the 2023 PY costs as those costs were approved as part of the 2023 PY budget.

3. BUDGET CAPS

Resolution E-4999 established a budget cap of 10% of the total program budget for program administration costs and a budget cap of 4% of the total program budget for ME&O costs.³

Table 2 below represents the forecasted DAC-GT PY 2025 Program Administration and ME&O costs as a percent of the total forecasted budget.

Table 2: 2025 Program Administration and ME&O Forecasts

% of Total 2025 PY DAC-GT Budget		
<u>Program Administration</u>	<u>Max 10% of total budget after start-up years</u>	<u>6%</u>
<u>ME&O</u>	<u>Max 4% of total budget after start-up years</u>	<u>1%</u>

4. BUDGET RECONCILIATION FOR PY 2023

PCE submitted a budget for PY 2023 as an attachment to its Budget Request AL 30-E for the DAC-GT and the Community Solar Green Tariffs Program (CSGT), which was filed with the Commission on April 3, 2023, and in its supplemental Budget Request AL 030-E-A, which was filed on June 7, 2023.

³ See Resolution E-4999 at 67 (OP 2) (noting that Program Administrators can submit a Tier 3 AL requesting an adjustment to the budget allocations if necessary).

The table below shows the forecasted costs for 2023 compared to actual costs, resulting in true ups per line item and per total program budget that will be carried forward to future PYs.

Table 3: Budget Reconciliation for PY 2023

Tab	Category	DAC-GT			CSGT		
		Forecast	Actual	True-up	Forecast	Actual	True-up
1	Generation Cost Delta	\$550,015.39	\$814,109.36	\$(264,093.97)	\$-	\$-	\$-
2	20% Bill Discount	\$322,317.27	\$272,116.08	\$50,201.19	\$-	\$-	\$-
	Program Administration						
3a	Program Management	\$10,125.00	\$2,099.60	\$8,025.40	\$1,125.00	\$2,099.60	\$(974.60)
3b	Information Technology	\$13,230.00	\$-	\$13,230.00	\$-	\$-	\$-
3c	Billing Operations	\$3,803.34	\$5,560	\$(1,756.87)	\$971.96	\$1,420.94	\$(448.98)
3d	Regulatory Compliance	\$8,412.94	\$17,798	\$(9,385.51)	\$8,412.94	\$17,798.45	\$(9,385.51)
3e	Procurement	\$19,906.36	\$14,055	\$5,851.32	\$10,533.75	\$2,100	\$8,434.15
3f	CCA Integration	\$2,430.00	\$1,623.86	\$806.14	\$-	\$-	\$-
	Subtotal Program Administration	\$57,907.64	\$41,137.16	\$16,770.48	\$21,043.65	\$23,418.60	\$(2,374.95)
4	Marketing, Education & Outreach	\$7,247.21	\$7,200.00	\$47.21	\$19,247.21	\$-	\$19,247.21
5	EM&V	\$-	\$-	\$-	\$-	\$-	\$-
	Total	\$937,487.51	\$1,134,562.60	\$(197,075.09)	\$40,290.86	\$23,418.60	\$16,872.26

5. 2025 BUDGET REQUEST

Based on the budget forecast for PY 2025 presented in Section 3 and the budget reconciliation for PY 2023 presented in Section 5, PCE is requesting a total budget of **\$1,312,362.67** for the DAC-GT and CSGT programs in this Advice Letter.

Table 4: Total Budget Request for PY 2025

	DAC-GT	CSGT	Total
Budget Forecast for 2025	\$1,132,159.84		\$1,132,159.84
Budget Carryover from 2023	\$(197,075.09)	\$16,872.26	\$(180,202.83)
Total	\$1,329,234.94	\$(16,872.26)	\$1,312,362.67

6. PROGRAM CAPACITY AND ENROLLMENT NUMBERS

PCE reports program capacity and customer enrollment numbers for PY 2025 in the figure below.

For PY 2025, PCE is forecasting full capacity procurement and customer enrollment using the combination of interim and new permanent resources.

Table 5: Program Capacity and Enrollment Count for DAC-GT Program

	2025 Forecast	2024 Forecast	2023 Actuals
Estimated capacity to be procured (MW)	6	3.74	3.74
Estimated customer enrollment (#)	3154	2241	1393

7. CONCLUSION

PCE respectfully requests the Commission approve PCE's PY 2025 budget proposed herein.



APPENDIX B

**Projected Marketing Education and Outreach Plan for the
Disadvantaged Communities Green Tariff and Community
Solar Green Tariff Programs for Program Year 2025**

Proposed by Peninsula Clean Energy Authority



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A. Purpose and Goals

Peninsula Clean Energy Authority (PCE) will develop and implement a targeted customer marketing, education, and outreach (ME&O) campaign to ensure customers in disadvantaged communities (DACs) who are enrolled in the Disadvantaged Communities Green Tariff (DAC-GT) understand the benefits. PCE's ME&O strategy has three main goals:

- Equitably and efficiently enroll eligible customers in the DAC-GT and programs;
- Encourage customer retention by providing access to community-based organizations who can help explain the programs' benefits and how they appear on the bill; and
- Increase awareness of and enrollment in California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) discount programs.

To meet these goals, PCE informs customers of their program enrollment through accessible language and offers additional community resources to help customers understand their bills and other utility discount programs that may be available to them. These additional community resources are provided through PCE's well-developed relationships with CBOs throughout our service territory, including Los Banos. PCE currently awards grants to 16 CBOs to help customers understand their energy bill, discounts, and other energy programs in at least seven languages.

PCE is currently auto-enrolling priority eligible customers into DAC-GT, which eliminates the barriers to receiving the program benefits that customers may face when they must opt-in to a program. As PCE's DAC-GT program does not face these same enrollment barriers, PCE's ME&O strategy is to instead ensure that these auto-enrolled customers understand the program benefits and do not opt out of it due to confusion. Success of the ME&O plan will be measured in customer retention in the DAC programs, a sign that the customer understood the value of the program and choose to remain enrolled.

As PCE utilizes customer auto-enrollment for the DAC-GT program, there is no way for interested residents to sign up to participate in the program.¹ Therefore, it is not a good use of program funds to conduct a general public outreach campaign to eligible customers who cannot sign up. In fact, such a campaign may lead to unfortunate customer confusion.

B. Guiding Principles

PCE 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, PCE commits to the following guiding principles throughout the ME&O engagement process for the DAC-GT and CSGT programs. PCE aims to:

¹ The only exception is that customers who are enrolled in PCE's DAC-GT program and move to a new eligible address are given a 90 day grace period to retain their subscription to the program.

- 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 interest space to better engage them in the process; and
- Build a collaborative process with community partners to ensure that the barriers to and benefits of participation are considered in ME&O activities to the maximum extent possible.

C. Target Audience

Given enrollment specifications around the programs, the primary target audience for the ME&O strategy are customers living in either:

1. a census tract, identified by the version of CalEnviroScreen in effect when PCE’s DAC-GT and CSGT implementation plan was approved by the CPUC or any subsequent versions as either scoring among the top 25% of census tracts statewide;
2. a census tract identified by the version of CalEnviroScreen in effect when PCE’s DAC-GT and CSGT implementation plan was approved by the CPUC or any subsequent versions scoring in the highest 5% of the CalEnviroScreen’s Pollution Burden, and that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data; or
3. in California Indian Country as defined in 18 United States Code Section 1151, with the exception of privately held in-holdings, which are defined as non-Indian owned fee land located within the exterior boundaries of California Indian Country; in the event of multiple owners, such land shall be considered Indian owned if at least one owner is a tribe or tribal member, regardless of the use of the land.

In PCE’s service area this includes customers in the following neighborhoods:²

Figure 1: Qualifying Neighborhoods in PCE Service Territory

Census Tract	City for Approx. Location	County
6081602100	South San Francisco	San Mateo
6081602200	South San Francisco	San Mateo
6081602300	South San Francisco	San Mateo
6081604101	San Bruno	San Mateo
6081604200	San Bruno	San Mateo
6081610201	Redwood City	San Mateo
6081610202	Redwood City	San Mateo

² Sources: SB535 Disadvantaged Communities using CalEnviroScreen 4.0, October 20, 2021, <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>; CalEnviroScreen 3.0, <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>.

6081606200	San Mateo	San Mateo
6081611900	East Palo Alto	San Mateo
6081612000	East Palo Alto	San Mateo
6047002302	Los Banos	Merced
6047002202	Los Banos	Merced
6047002201	Los Banos	Merced

D. ME&O Tactics and Strategies

In 2024, PCE plans to continue a two-pronged approach to ME&O for the DAC-GT program: ensuring that participants understand the program and offering them additional support to understand the program and their utility bills in general through trusted local CBOs.

PCE will continue to employ the same automatic enrollment process in PY 2024 based on California Public Utilities Commission (“CPUC”) guidance.³ PCE will use a three-tier customer identification process to automatically enroll customers until the program is fully subscribed. First, PCE will identify customers that are currently participating in the Arrearage Management Program (“AMP”) with service addresses in a PCE DAC and meet all other DAC-GT eligibility criteria. Second, PCE will identify customers that are currently eligible for the AMP but are not participating and with service addresses in a PCE DAC and meet all other DAC-GT eligibility criteria. Third, PCE will identify all remaining DAC-GT eligible PCE customers and use a random selection protocol to enroll customers into the DAC-GT program. When program capacity becomes available in the future due to unenrollment or other reasons, PCE will perform the same three-tiered process to ensure that new AMP enrollees, newly AMP-eligible customers, and new residential PCE customers that meet the other DAC-GT eligibility criteria will be considered in the auto-enrollment selection process.

1. Communications and Media Content

Newly enrolled DAC-GT customers will be informed of their participation in the program through clearly-written direct mail enrollment materials printed in both English and Spanish.

The enrollment information will also be available on the PCE website, which has a function that allows auto-translation into English, Spanish, traditional Chinese, and Tagalog. The website also hosts a form for customers to inform us of any moves to new eligible address, so they can maintain their participation in the program.

2. Community Outreach

PCE will also provide training to our network of 16 CBO grantee about the DAC-GT program

³ See Resolution E-5124 at 31 (OP 25), “It is reasonable for participating CCAs to automatically enroll eligible DAC-GT customers as long as their enrollment criteria are in alignment with the spirit of D.20-07-008 and target customers at high risk of disconnection.”

and how to help customer understand its benefits and billing. We find that confusion about billing presentation is a main reason customers opt-out of beneficial programs. We hope to maintain high customer retention by equipping local CBOs who regularly help customers understand their utility bills with the ability to explain the DAC-GT program.

PCE has a strong track record of partnering with local CBOs. In 2024 we launched our sixth annual round of community outreach grants to partner with 16 CBOs, several of which are located directly in our DAC communities including Los Banos. Collectively they serve these residents in at least seven languages: English, Spanish, Mandarin, Cantonese, Tagalog, Samoan, and Tongan.

Specifically, PCE will provide funding and collateral material for CBOs to conduct outreach around understanding their energy bills, CARE and FERA enrollment, and other energy efficiency programs. CBOs will engage in one-on-one support for customers seeking help with their utility bills and avoiding the disconnection process. CBOs will also provide outreach at events, workshops, community gathering places, and through social services such as food distribution programs on these topics.

3. Program Leveraging

PCE will train participating CBOs to leverage opportunities to interact with customers to explain both the DAC-GT program and other programs from which they may benefit.

PCE funds each CBO participating in the outreach partnership described above with a grant of up to \$40,000 to help customers understand utility bills and help customers enroll in our programs:

- PCE's Low-Income Home Upgrade program that helps eligible customers electrify their homes;
- PCE's Low-Income EV discount program that assists low-income families in buying used electric vehicles; and
- Other utility bill discounts such as Medical Baseline and LIHEAP

4. Metrics Tracking

As customers are automatically enrolled in DAC-GT, Peninsula Clean Energy will measure success in:

- Total number of enrollees.
- Number of new enrollees who received our bilingual enrollment letters in English and Spanish. We believe direct mail is the most effective way to reach this target audience.
- Number of visits to the DAC-GT page on PCE's website. We expect this number may be low as the target audience may have technology barriers related to the digital divide.
- Number of local CBOs trained to explain the DAC-GT program to customers.
- Customer retention in the program, used as a measure of how clearly we explained the benefits in the enrollment materials and through our community partners.



APPENDIX C
[CONFIDENTIAL]