



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL?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

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

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:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

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
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	



April 1, 2025

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

PCE Advice Letter 42-E

**RE: PENINSULA CLEAN ENERGY AUTHORITY 2026 BUDGET REQUEST AND
OUTREACH PLAN FOR THE DISADVANTAGED COMMUNITIES GREEN
TARIFF PROGRAM**

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 2026 Disadvantaged Community Green Tariff (“DAC-GT”) 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 May 1st, 2025.

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 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.⁶ The Decision also allocated additional DAC-GT program capacity.⁷ As a result of these two modifications, PCE's DAC-GT program capacity increased from 3.37 MW to 6.0125 MW.

PROGRAM YEAR 2026 BUDGET

PCE hereby submits its budget request for program year (“PY”) 2026 for the DAC-GT program. 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 2024) and the budget forecast for the upcoming PY (i.e., PY 2026). PCE requests a total budget of **\$2,475,952.85** for the DAC-GT program for PY 2026. Additional details can be found in Appendix A.

The table below represents the forecasted DAC-GT PY 2026 Program Administration and ME&O costs as a percent of the total forecasted budget.

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 D.24-05-065 at 169 (OP 2).

⁷ *Id.* at 170 (OP 3).

% of Total 2026 PY DAC-GT Budget		
Program Administration	Max 10% of total budget after start-up years	5%
ME&O	Max 4% of total budget after start-up years	0.8%

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 2026 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 cost line item in the calculation of the true up of the 2024 PY costs as those costs were approved as part of the 2024 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 2026;
2. Appendix B: Projected Marketing Education and Outreach Plan for the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs for Program Year 2026; 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 2026 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.") 16-07-015.

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
Senior 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 Jeremy Waen by electronic mail at jwaen@peninsulacleanenergy.com.

/s/ Jeremy Waen

Jeremy Waen
Senior Director, Regulatory Policy
Peninsula Clean Energy Authority

cc: Service List: R.14-07-002 and A.16-07-015

Appendix A
Disadvantaged Communities Green Tariff Program
Budget Forecast for Program Year 2026

Proposed by Peninsula Clean Energy Authority



Table of Contents

- 1. BACKGROUND 3
 - DAC-GT and CSGT Program Modifications.....4
- 2. DAC-GT BUDGET FORECAST FOR PY 2026..... 4
 - Generation Cost Delta.....5
 - 20% Bill Discount.....5
 - Program Administration Costs.....5
 - Marketing, Education, and Outreach (ME&O).....5
 - CCA Integration Costs.....5
- 3. BUDGET CAPS 6
- 4. BUDGET RECONCILIATION FOR PY 2024 6
- 5. 2026 BUDGET REQUEST 8
- 6. PROGRAM CAPACITY AND ENROLLMENT NUMBERS 8
- 7. CONCLUSION 8

Table of Figures

- Table 1 Budget forecast for PY 2026 4
- Table 2 2025 Program Administration and ME&O Forecasts..... 6
- Table 3 Budget Reconciliation for PY 2024..... 7
- Table 4 Total Budget Request for PY 2026..... 8
- Table 5 Program Capacity and Enrollment Count for DAC-GT Program 8

1. BACKGROUND

Per Resolution E-4999, Disadvantaged Community Green Tariff (“DAC-GT”) and Community Solar Green Tariff (“CSGT”) 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.

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.”

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.

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.

DAC-GT and CSGT Program Modifications

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 allocation additional DAC-GT capacity.

As a result of these two modifications, PCE’s DAC-GT program capacity increased from 3.37 MW to 6.0125 MW. The change in program capacity is reflected in the DAC-GT PY 2026 budget forecast below. In addition, PCE does not include a CSGT PY 2026 budget forecast but does account for previously disbursed CSGT funding for PY 2024 in the 2024 Budget Reconciliation which reduces the total requested budget for DAC-GT PY 2026.

2. DAC-GT BUDGET FORECAST FOR PY 2026

For PY 2026, PCE forecasts a total budget of **\$2,186,813.93** for the DAC-GT program. A detailed budget forecast for each budget line item can be found in the figure below.

Table 1 Budget forecast for PY 2026

Category	2026 Forecast
Generation Cost Delta	\$1,229,385.79
20% Bill Discount	\$819,550.19
Program Administration	
Program Management	\$52,949.40
Information Technology	\$15,734.28
Billing Operations	\$3,770.64
Regulatory Compliance	\$30,158.83
Procurement	\$17,462.88
CCA Integration	\$-
Subtotal Program Administration	\$120,076.03
Marketing, Education & Outreach	\$17,801.92
EM&V	\$-
Total DAC-GT	\$2,186,813.93

PCE provides the following clarifying notes regarding the budget summary.

Generation Cost Delta

PCE's new 3.0 MW solar resource to serve its DAC-GT program came online in March 2025. PCE will continue to leverage existing interim resources to supply the balance of PCE's 6.0125 MW DAC-GT capacity until additional permanent resources can be procured.

20% Bill Discount

As described further in PCE Advice Letter 14-E and as directed in Resolution E-5124, PCE's 2026 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").

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 2026 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.

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 2026 Program Administration and ME&O costs as a percent of the total forecasted budget.

Table 2 2026 Program Administration and ME&O Forecasts

% of Total 2026 PY DAC-GT Budget		
Program Administration	Max 10% of total budget after start-up years	5%
ME&O	Max 4% of total budget after start-up years	0.8 %

4. BUDGET RECONCILIATION FOR PY 2024

The table below shows the forecasted costs for 2024 compared to actual costs, resulting in true ups per line item and per total program budget that will be carried forward to future PYs.

The 2024 Generation Cost Delta actual costs exceeded forecasted values due to unanticipated shifts in program resource profile. Initial projections made in 2022 for the 2024 PY anticipated that the new permanent DAC-GT solar resource would reach commercial operation and contribute 3 MW of the total 3.74 MW program capacity and the remaining 0.74 MW would be supplied by the interim resource. However, the permanent resource did not come online in the 2024 PY so the interim resource ultimately fulfilled the entire 3.74 MW. This change in the program resource profile, and the difference in the costs of these resources, is the primary factor behind the true-up difference observed in the final calculations.

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).

Table 4 Budget Reconciliation for PY 2024

Category	DAC-GT			CSGT		
	Forecast	Actual	True-up	Forecast	Actual	True-up
Generation Cost Delta	\$777,945.54	\$988,564.02	\$(210,618.48)	\$-	\$-	\$-
20% Bill Discount	\$474,093.47	\$558,471.39	\$(84,377.92)	\$-	\$-	\$-
Program Administration						
Program Management	\$11,385.00	\$8,362.11	\$3,022.89	\$1,125.00	\$2,966.00	\$(1,841.00)
Information Technology	\$13,735.00	\$11,449.04	\$2,285.97	\$-	\$649.04	\$(649.04)
Billing Operations	\$3,544.65	\$2,872	\$672.99	\$971.96	\$733.87	\$238.09
Regulatory Compliance	\$14,272.00	\$20,293	\$(6,020.84)	\$8,412.94	\$20,292.84	\$(11,879.90)
Procurement	\$15,583.00	\$22,758	\$(7,175.33)	\$10,533.75	\$3,713	\$6,820.26
CCA Integration	\$-	\$-	\$-	\$-	\$-	\$-
Subtotal Program Administration	\$58,519.65	\$65,733.96	\$(7,214.32)	\$21,043.65	\$28,355.23	\$(7,311.58)
Marketing, Education & Outreach	\$8,336.16	\$7,200.00	\$1,136.16	\$19,247.21	\$-	\$19,247.21
EM&V	\$-		\$-	\$-		\$-
Total						
	\$1,318,894.82	\$1,619,969.37	\$(301,074.56)	\$40,290.86	\$28,355.23	\$11,935.63

5. 2026 BUDGET REQUEST

Based on the budget forecast for PY 2026 presented in Section 3 and the budget reconciliation for PY 2024 presented in Section 5, PCE is requesting a total budget of \$2,691,077,00 for the DAC-GT program in this Advice Letter.

Table 4 Total Budget Request for PY 2026

	DAC-GT	CSGT	Total
Budget Forecast for 2026	\$2,186,813.93		\$2,186,813.93
Budget Carryover from 2024	\$(301,074.56)	\$11,935.63	\$(289,138.92)
Total	\$2,487,888.49	\$(11,935.63)	\$2,475,952.85

6. PROGRAM CAPACITY AND ENROLLMENT NUMBERS

PCE reports program capacity and customer enrollment numbers for PY 2026 in the figure below.

For PY 2026, 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

	2026 Forecast	2024 Actuals
Capacity procured (MW)	6.0125	3.74
Customer enrollment (#)	2772	1555

7. CONCLUSION

PCE respectfully requests the Commission approve PCE's PY 2026 budget proposed herein.

Appendix B

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

Proposed by Peninsula Clean Energy Authority



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 five 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 program. 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 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 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 servicearea 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
6081606200	San Mateo	San Mateo
6081611900	East Palo Alto	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>.

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 2026, 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 2026 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 grantees about the DAC-GT program 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

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.”

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 2025 we launched our seventh annual round of community outreach grants to partner with 16 CBOs, several of which are located directly in our DAC communities. Collectively they serve these residents in at least five languages: English, Spanish, Mandarin, Cantonese, and Tagalog.

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 \$45,000 to help customers understand utility bills and help customers enroll in 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 CARE/FERA, 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.