

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	

February 1, 2022

California Public Utilities Commission
Energy Division
Attention: Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

**RE: CleanPowerSF Advice Letter 21-E
CleanPowerSF Disadvantaged Communities Green Tariff and Community
Solar Green Tariff Program Year 2023 Budget and Marketing, Education,
and Outreach Plan (Public Version)**

Purpose

CleanPowerSF respectfully submits this Tier 2 Advice Letter requesting approval of its Disadvantaged Communities Green Tariff (“DAC-GT”) and Community Solar Green Tariff (“CSGT”) 2023 program year budgets and marketing, education, and outreach (“ME&O”) plan.

Background

On June 21, 2018, the California Public Utilities Commission (“Commission” or “CPUC”) approved D.18-06-027, establishing the Disadvantaged Communities Green Tariff and Community Solar Green Tariff to increase the development and adoption of renewables in California’s disadvantaged communities (“DACs”).¹ The DAC-GT and CSGT programs offer eligible customers 100% renewable energy at a 20% total electric bill discount.

Community Choice Aggregators (“CCAs”) may develop their own DAC-GT and CSGT programs.² If a participating CCA submitted an implementation plan that shows compliance with all program rules in a Tier 3 advice letter (“AL”) to the Commission by January 1, 2021, it can access greenhouse gas (“GHG”)

¹ D. 18-06-027, p. 16. DACs are defined as communities identified in the CalEnviroScreen 4.0 as among the top 25 percent of census tracts statewide, plus the census tracts in the highest five percent of CalEnviroScreen 4.0 Pollution Burden scores that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

² D.18-06-027, p. 104 (Ordering Paragraph (“OP”) No. 17).

CleanPowerSF is a program of the San Francisco Public Utilities Commission (SFPUC), an enterprise department of the City and County of San Francisco.

CleanPowerSF is committed to protecting customer privacy. Learn more at cleanpowersf.org/privacy.

OUR MISSION: To provide our customers with high-quality, efficient and reliable water, power and sewer services in a manner that values environmental and community interests and sustains the resources entrusted to our care.

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allowance revenues and public purpose program (“PPP”) funds to support these programs after plan approval.³ CleanPowerSF filed its implementation Advice Letter on December 31, 2020, and received approval with clarifications in Commission Resolution E-5124.⁴

Resolution E-4999, which approved, with modification, the investor-owned utilities’ (“IOUs”) DAC-GT and CSGT implementation Advice Letters, established procedural rules for these programs. Ordering paragraph 2 directs the IOUs to submit a program year budget request and ME&O plan via a Tier 1 Advice Letter by February 1 of each year.⁵ Resolution E-4999 also provides details regarding the budget submission requirements. Ordering Paragraph 4 specifies that program administrators must reconcile the prior year’s budget forecast and actual expenditures in their annual budget requests.⁶

Resolution E-5124 directs CCAs and Pacific Gas & Electric Company (“PG&E”) to take certain procedural steps regarding 2022 Energy Resource Recovery Account (“ERRA”) compliance and cost recovery for DAC-GT and CSGT Program Year 2021 and 2022 expenses.⁷ PG&E incorporated CleanPowerSF’s and Northern California CCAs’ budgets into its 2022 forecast.⁸ Now that this process is established, CleanPowerSF expects PG&E to include its approved DAC-GT and CSGT budgets in its 2023 ERRA filing and all subsequent program years.

In response to IOU Advice Letters requesting to adjust administration and marketing budget caps for their 2021 and 2022 DAC-GT and CSGT budgets, the Commission issued Resolution E-5125.⁹ In addition to approving, with modifications, the IOUs’ requests, Resolution E-5125 elevated the Annual Budget Advice Letters “from Tier 1 to Tier 2 designation to allow for greater opportunity for stakeholder review and additional oversight.”¹⁰ If a program administrator’s proposed DAC-GT or CSGT budget exceeds either the 10% program administration or 4% ME&O cap, the budget must be accompanied by a rationale explaining why the exceedance is warranted in the Annual Budget Advice Letter.¹¹

³ Resolution E-5124, pp. 28-29 (Findings and Conclusions No. 2).

⁴ *Id.* p. 29 (Findings and Conclusions No. 2); p. 32 (OP No. 1).

⁵ Resolution E-4999, p. 67 (OP No. 2).

⁶ *Id.* p. 68 (OP No. 4).

⁷ Resolution E-5124, pp. 10-11.

⁸ Resolution E-5124, p. 10.

⁹ Resolution E-5125, p. 2.

¹⁰ *Id.* p. 2.

¹¹ Resolution E-4999, p. 67 (OP No. 2); Resolution E-5125, p. 11 (OP No. 2).

Discussion

CleanPowerSF submits this Tier 2 Advice Letter seeking Commission approval of its 2023 DAC-GT and CSGT budgets. CleanPowerSF DAC-GT and CSGT program budgets and ME&O plan are attached to this Advice Letter as the following appendices:

- Appendix A: Program Budgets for CleanPowerSF Program Year 2023;
- Appendix B (Confidential): Workpapers supporting the calculation of the above market generation costs and 20% bill discount; and
- Appendix C: CleanPowerSF Marketing, Education and Outreach Plan for Program Year 2023.

CleanPowerSF has budgeted totals of \$768,049 for its DAC-GT program and \$67,637 for its CSGT program in 2023. The budgets include CleanPowerSF costs associated with above market generation, the 20% bill discount, program administration, and ME&O. Also included under program administration is CleanPowerSF's share of PG&E CCA integration costs which reflect expenses incurred by PG&E to facilitate implementation of CCA DAC-GT and CSGT programs.¹² Table 1 summarizes CleanPowerSF's total program budgets for Program Year 2023.

Table 1 CleanPowerSF DAC-GT and CSGT 2023 Budgets

Category	DAC-GT	CSGT
	2023	2023
Generation Cost Delta	\$ 395,154	\$ -
Bill Discount	\$ 233,585	\$ -
Program Administration		
Program Management	\$ 61,711	\$ 7,892
PG&E CCA Integration Costs	\$ 2,430	\$ -
Information Technology	\$ -	\$ -
Billing Operations	\$ 27,285	\$ -
Regulatory Compliance	\$ 7,311	\$ 2,212
Procurement	\$ 18,770	\$ 39,742
Program Administration Total	\$ 117,508	\$ 49,846
Marketing, Education, and Outreach	\$ 21,801	\$ 17,790
Program Total	\$ 768,049	\$ 67,637
2023 Program Year Total	\$	835,685

¹² Resolution E-5124, p. 11 (OP No. 1).

The final 2021 DAC-GT and CSGT budgets were submitted via Tier 1 Advice Letter on June 14, 2021, for CleanPowerSF's first DAC-GT and CSGT program year.¹³ CleanPowerSF has unspent 2021 funds and reconciles forecasted costs to account for these. There is \$443,849 remaining to be carried forward in 2023. The table below ("Table 2") summarizes CleanPowerSF's total budget request by program for Program Year 2023.

Table 2 CleanPowerSF New Budget Request

	DAC-GT	CSGT	Total
Budget Carry-Over from PY 2021	\$ 327,544	\$ 116,304	\$ 443,849
New Budget Request for PY 2023	\$ 440,504	\$ -	\$ 440,504
Total PY 2023 Budget	\$ 768,049	\$ 67,637	\$ 835,685

1. CleanPowerSF's 2023 DAC-GT Budget.

As shown below in Table 3, CleanPowerSF's 2023 DAC-GT budget does not exceed the 4% ME&O budget cap established in Resolution E-4999 for the third program year.¹⁴ The program administration cost category exceeds the 10% cap, representing 15% of the total program budget, in part, because CleanPowerSF does not expect that a fully automated billing solution between PG&E and CleanPowerSF's billing provider will be in place by 2023. Instead, staff will need to manually transmit discount related data and perform quality control checks to ensure customers are receiving their bill discounts as expected. Using data provided from programs currently in operation, CleanPowerSF has budgeted additional time for these manual processes, resulting in higher costs. Additionally, there are fixed fees associated with compliance, such as Green-e® registration that do not scale with the size of the program. These fees account for a disproportionate share of a smaller program's budget. As a result of these factors, CleanPowerSF's proposed program administration budget exceeds the 10% cap. CleanPowerSF requests its exceedance be approved to facilitate CleanPowerSF's compliance with the program requirements.

¹³ CleanPowerSF Advice Letter 15-E.

¹⁴ Resolution E-4999, p. 67 (OP No. 2).

Table 3 CleanPowerSF DAC-GT Budget

	Total	% of Budget
Generation Cost Delta	\$ 395,154	51%
20% Bill Discount	\$ 233,585	30%
Program Administration	\$ 117,508	15%
Marketing Education and Outreach	\$ 21,801	3%
Total	\$ 768,049	100%

2. CleanPowerSF's 2023 CSGT Budget.

CleanPowerSF does not anticipate offering the CSGT program in 2023 because CleanPowerSF did not receive any CSGT bids in response to its first DAC programs solicitation. While CleanPowerSF will not have an operating CSGT program in 2023, there will still be program related expenses, such as those associated with continued efforts to procure a CSGT resource, conducting project sponsor outreach, and maintaining regulatory compliance for the program. As noted in Resolution E-5125, without generation and bill discount costs the program administration and ME&O line items automatically exceed their respective cost caps.¹⁵ The proposed 2023 CSGT budget exceeds the program administration and ME&O caps, representing 74% and 26% of the total budget respectively. The program administration and ME&O budget cap exceedances are needed to support a future CSGT program launch and to comply with program requirements set by the Commission. CleanPowerSF therefore requests the Commission approve the CSGT budget as proposed for the 2023 program year.

Table 4 CleanPowerSF CSGT Budget

	Total	% of Budget
Generation Cost Delta	\$ -	0%
20% Bill Discount	\$ -	0%
Program Administration	\$ 49,846	74%
Marketing Education and Outreach	\$ 17,790	26%
Total	\$ 67,637	100%

3. CleanPowerSF's 2023 CleanPowerSF's ME&O plan.

As is discussed in further detail in Appendix C, CleanPowerSF's ME&O plan consists of a culturally competent and multilingual approach to increase awareness of and enrollment in DAC-GT as well as other discounts and

¹⁵ Resolution E-5125, p. 10 (Findings and Conclusion No. 12).

incentives available to low-income customers. CleanPowerSF requests the Commission approve its ME&O plan for the program year.

Effective Date

Pursuant to General Order 96-B, General Rule 7.3.4 and Energy Industry Rule 5.3, this Tier 2 Advice Letter will become effective after 30 days, on March 3rd, 2022, or after staff approval.

Tier Designation

This Advice Letter has a Tier 2 designation pursuant to OP 3 of Resolution E-5125.¹⁶

Confidential Information

Certain information in Appendix B is kept confidential pursuant to the “Declaration of Michael A. Hyams in support of Confidential Treatment of Data and Information Contained in Appendix B of CleanPowerSF Advice Letter 21-E: CleanPowerSF Disadvantaged Communities Green Tariff and CleanPowerSF Community Solar Green Tariff Bill Discount and Generation Cost Delta Workpapers for Program Year 2023” submitted concurrently.

Protests

Anyone wishing to protest this Advice Letter may do so by sending a letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than twenty (20) days after the date of this filing, February 21, 2022. Protests should be submitted to:

California Public Utilities Commission
Attention: Energy Division Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102
Facsimile: 415-703-2200
Email: EDTariffUnit@cpuc.ca.gov

Copies of protests should also be mailed to the attention of the Director, Energy Division, Room 4004 at the same address above. The protest should also be sent to CleanPowerSF on the same date it is submitted to the California Public Utilities Commission:

Kiara Hermann

¹⁶ Resolution E-5125, p. 11 (OP No. 3).

Utility Analyst, CleanPowerSF
San Francisco Public Utilities Commission
525 Golden Gate Avenue, 7th Floor
San Francisco, CA 94102
Email: PowerRegulatory@sfgwater.org
Facsimile: 415-554-1851

Notice

A copy of this Advice Letter is being served on the official Service List for Rulemaking 14-07-002.

For changes to this Service List, please contact the Commission's Process Office at 415-703-20021 or by electronic mail at Process_Office@cpuc.ca.gov.

Conclusion

CleanPowerSF respectfully requests the Commission approve the proposed DAC-GT and CSGT budgets and ME&O plan as described in the attached appendices.



Michael A. Hyams
Director, CleanPowerSF
San Francisco Public Utilities Commission
525 Golden Gate Avenue, 7th Floor
San Francisco, CA 94102
Email: MHyams@sfgwater.org

cc: Service List: R.14-07-002

APPENDIX A – AL 21E

CleanPowerSF Disadvantaged Communities Green Tariff and CleanPowerSF
Community Solar Green Tariff Programs Budget Forecast for Program Year
2023



Services of the San Francisco
Public Utilities Commission



I. Purpose

Pursuant to Ordering Paragraph 17 of California Public Utilities Commission (“CPUC”) Decision 18-06-027, *Alternate Decision Adopting Alternatives to Promote Solar Distributed Generation in Disadvantaged Communities*, and guidance provided in CPUC Resolution E-4999, CleanPowerSF hereby submits this budget forecast for its Disadvantaged Communities Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT) programs for Program Year 2023 and actual costs for Program Year 2021.

CleanPowerSF requests that the proposed budgets be approved by the CPUC, and that the CPUC direct PG&E to transfer funds to meet the approved program budgets per the funding mechanisms discussed below.

II. Background

Per Resolution E-4999, estimated budget forecasts must be presented for the proposed program and include the following items:

- Generation cost delta, if any¹
- 20% bill discount for participating customers;
- Program administration costs broken into the following categories:
 - Program Management
 - Information Technology (IT)
 - Billing Operations
 - Regulatory Compliance
 - Procurement
- Marketing, education, and outreach costs broken into the following categories:
 - Labor costs
 - Outreach and material costs
 - Local community-based organization/sponsor costs (for CSGT only)

In addition to budget forecasts, annual program budget submissions must also include details on program capacity and actual customer enrollment numbers for both programs. CleanPowerSF will report on the following metrics with its annual budget submissions:

- Existing capacity at previous program year’s (PY) close;

¹ 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 CPUC’s Energy Division after the release of the Resolution, 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.’

- Forecasted capacity for procurement in the upcoming PY;
- Customers served at previous PY's close; and
- Forecasted customer enrollment for the upcoming PY.

Confidential Appendix B contains the following information:

- Workpapers for the calculation of the generation cost delta; and
- Workpapers for the calculation of the 20% discount to participating customers.

For the reasons set forth in the attached Declaration of Michael A. Hyams in Support of Confidential Treatment of Data and Information Contained in CleanPowerSF's Advice Letter 21-E, Appendix B, these two calculations are confidential and not included in the public Advice Letter filing.

III. Budget Forecast for Program Years 2021 and 2022

For program year 2023 CleanPowerSF requests a total budget of \$835,685 for its DAC-GT and CSGT programs. A detailed budget forecast for each program and PY by budget line item can be found in Table 1 below:

Table 1 CleanPowerSF 2023 Budget Forecast

Category	DAC-GT	CSGT
	2023	2023
Generation Cost Delta	\$ 395,154	\$ -
Bill Discount	\$ 233,585	\$ -
Program Administration		
Program Management	\$ 61,711	\$ 7,892
PG&E CCA Integration Costs	\$ 2,430	\$ -
Information Technology	\$ -	\$ -
Billing Operations	\$ 27,285	\$ -
Regulatory Compliance	\$ 7,311	\$ 2,212
Procurement	\$ 18,770	\$ 39,742
Program Administration Total	\$ 117,508	\$ 49,846
Marketing, Education, and Outreach	\$ 21,801	\$ 17,790
Program Total	\$ 768,049	\$ 67,637
2023 Program Year Total	\$	835,685

a. Generation Cost Delta

CleanPowerSF does not anticipate having a *new* DAC-GT or CSGT project come online before 2023. CleanPowerSF closed bidding for its solicitation for DAC-GT and CSGT generation supplies

on December 15, 2021 and is currently evaluating the bids received. CleanPowerSF intends to use an interim resource to expedite the offering of its DAC-GT program. CleanPowerSF issued a solicitation for interim DAC-GT generation supplies in December 2021. The generation cost delta budget forecast for the DAC-GT reflects CleanPowerSF's expected costs to procure generation supplies from an interim resource.

b. Bill Discount

As directed in Resolution E-5124,² CleanPowerSF will forecast the 20% discount for the generation and delivery portions of the electric bill. CleanPowerSF will apply the total 20% discount to the generation portion of the bill. Pacific Gas & Electric Company, the investor-owned utility providing transmission and distribution services to customers participating in CleanPowerSF's programs, will be responsible for transmitting its portion of the discount base data to CleanPowerSF.

c. Program Administration Costs

Program administration includes program development and management, budgeting, and reporting. Information technology costs include costs to develop program tools and updating existing systems to accommodate program enrollment and billing. Billing operations covers costs for ongoing billing work to calculate and apply the 20% discount and customer support once all systems are developed. Regulatory covers regulatory compliance costs for the electricity products and related program filings with the CPUC. Procurement covers costs to develop and manage the solicitations for resources to support the programs as well as renewable energy credit retirement and the required Green-e® Energy product certification.

d. Marketing, Education and Outreach (ME&O)

The ME&O budget is split into three categories: (1) Labor costs, (2) Direct costs for outreach and collateral, and (3) Funding provided to local community-based organizations to support program outreach and enrollment. More detail on the ME&O budget is included in Appendix C of this filing.

IV. Budget Caps

Resolution E-4999 establishes a budget cap of 10% of the total program budget for program administration costs and a 4% total budget cap for ME&O costs.³ In Resolution E-5125, the Commission directs program administrators whose budgets exceed these caps starting in the third program year to include a rationale in their Tier 2 Budget Advice Letter filing.⁴

² Resolution E-5124 at p. 12.

³ The IOUs can submit a Tier 3 Advice Letter requesting an adjustment to the budget allocations if the need arises. (Resolution E-4999, pp. 27). The same opportunity should also apply to the CCAs.

⁴ Resolution E-5125 at p. 2.

CleanPowerSF’s Program Administration and ME&O budgets as a percentage of the total program budgets are summarized in the table below.

Table 2 Program Administration and ME&O Budget Percentages

	DAC-GT	CSGT
Program Administration	15%	74%
Marketing, Education and Outreach	3%	26%

CleanPowerSF does not expect that a fully automated billing solution between PG&E and its billing provider will be in place by 2023. Instead, staff will need to manually transmit discount related data and perform quality control checks to ensure customers are receiving their bill discounts as expected. Using data provided from programs currently in operation, CleanPowerSF has budgeted additional time for these manual processes that have resulted in higher Program Administration costs. Additionally, there are fixed fees associated with program regulatory compliance, such as Green-e® registration that do not scale with the size of the program. They represent a much larger proportion of a smaller program’s budget. As a result of these factors, CleanPowerSF’s proposed Program Administration budget exceeds the Resolution E-4999 10% cap.

CleanPowerSF did not receive any CSGT bids in response to its first DAC programs solicitation. As such, CleanPowerSF does not anticipate offering the CSGT program in 2023. While CleanPowerSF will likely not have an operating CSGT program in 2023, there will still be program related expenses, such as those associated with continued efforts to procure a CSGT resource, conducting project sponsor outreach, and maintaining regulatory compliance for the program. As noted in Resolution E-5125, without generation and bill discount costs, the program administration and ME&O line items automatically exceed the cost caps.⁵ The budget cap exceedance is needed to support CleanPowerSF’s CSGT procurement and program launch and to comply with program requirements set by the Commission.

V. Budget Reconciliation for Program Year 2021

CleanPowerSF submitted its PY 2021 budget with the implementation plan that was approved in Resolution E-5124. PY 2021 was CleanPowerSF’s first DAC-GT and CSGT program year. The table below summarizes actual spend against forecasted amounts for each of the budget categories.

⁵ Resolution E-5125, Findings and Conclusion No. 12.

Table 3 Forecast-to-Actual PY 2021 Expenses

Category	DAC-GT			CSGT		
	Forecast	Actual	True-Up	Forecast	Actual	True-Up
Generation Cost Delta	\$ 130,439	\$ -	\$ (130,439)	\$ -	\$ -	\$ -
Bill Discount	\$ 38,890	\$ -	\$ (38,890)	\$ -	\$ -	\$ -
Program Administration						
Program Management	\$ 91,786	\$ 13,243	\$ (78,543)	\$ 51,650	\$ 4,363	\$ (47,286)
PG&E CCA Integration Costs	\$ 12,856	\$ 15,556	\$ 2,700	\$ 1,263	\$ -	\$ (1,263)
Information Technology	\$ 16,915	\$ 21,250	\$ 4,335	\$ 16,915	\$ -	\$ (16,915)
Billing Operations	\$ 34,327	\$ 27,727	\$ (6,601)	\$ 2,217	\$ 127	\$ (2,090)
Regulatory Compliance	\$ 13,122	\$ 5,940	\$ (7,182)	\$ 3,346	\$ 5,612	\$ 2,265
Procurement	\$ 41,895	\$ 12,552	\$ (29,343)	\$ 35,666	\$ 16,147	\$ (19,519)
Program Administration Total	\$ 210,901	\$ 96,267	\$ (114,634)	\$ 111,058	\$ 26,250	\$ (84,808)
Marketing, Education, and Outreach	\$ 47,913	\$ 4,332	\$ (43,581)	\$ 37,081	\$ 5,585	\$ (31,496)
Program Total	\$ 428,144	\$ 100,599	\$ (327,544)	\$ 148,139	\$ 31,834	\$ (116,304)
2021 Program Year Forecasted Total	\$					576,282
2021 Program Year Actual Totals	\$					132,434
2021 Program Year True Up	\$					(443,849)

CleanPowerSF did not begin serving customers under its DAC-GT program in 2021, therefore all funds budgeted for the bill discount and generation cost delta should be carried forward to future program years. Actual DAC-GT ME&O and Program Administration expenses totaled \$100,599, \$327,344 less than what was budgeted. CSGT expenses totaled \$31,834, \$116,304 less than budgeted. These excess funds shall be carried forward to future program years.

VI. Program Year 2023 Budget Request

After applying the budget reconciliation from the previous section to the proposed budget discussion in Section III., CleanPowerSF requests approval for an incremental PY 2023 total of \$440,504 for DAC-GT and \$0 for CSGT.

Table 4 CleanPowerSF PY 2023 Budget Request

	DAC-GT	CSGT	Total
Budget Carry-Over from PY 2021	\$ 327,544	\$ 116,304	\$ 443,849
New Budget Request for PY 2023	\$ 440,504	\$ -	\$ 440,504
Total PY 2023 Budget	\$ 768,049	\$ 67,637	\$ 835,685

VII. Program Capacity and Enrollment Caps

CleanPowerSF includes forecasted program capacity and enrollment in Tables 5 and 6 below. CleanPowerSF is planning to begin serving customers under its DAC-GT program in the first quarter of 2022. CleanPowerSF does not anticipate operating a CSGT program in 2023, but is

planning to procure supply to support program operations in 2024 or 2025, depending on the results of its power supply procurement activities.

Table 5 DAC Green Tariff Capacity and Enrollment Forecasts

	2023
Interim Capacity Procured	1.826 MW
Estimated New Capacity to be Procured	1.826 MW
Estimated Customer Enrollment	1,234

Table 6 Community Solar Green Tariff Capacity and Enrollment Forecasts

	2023
Estimated Capacity to be Procured	0.5525
Estimated Customer Enrollment	0

VIII. Cost Recovery and Transfer Procedures

Once the CPUC approves CleanPowerSF’s budget request for the programs, PG&E will be responsible for including the approved budget for CleanPowerSF’s DAC-GT and CSGT programs in its current ERRRA forecast application, as directed by the CPUC. Once PG&E receives approval of its ERRRA application, PG&E should set aside the requested amount in CleanPowerSF DAC-GT and CleanPowerSF CSGT balancing subaccounts. PG&E will transfer funds to CleanPowerSF on an annual basis at the beginning of the program year.

For 2021 program funds, CleanPowerSF requests that the CPUC order PG&E to transfer all past due funds within thirty days of approval of a final Decision in the 2022 ERRRA.

IX. Conclusion

CleanPowerSF respectfully requests that the CPUC approve the proposed budgets for its DAC-GT and CSGT programs and direct PG&E to transfer funds sufficient to meet its approved annual budgets on a forward quarterly basis.

APPENDIX B – AL 21E

CleanPowerSF Disadvantaged Communities Green Tariff and CleanPowerSF
Community Solar Green Tariff Bill Discount and Generation Cost Delta
Workpapers for Program Year 2023

PUBLIC VERSION



San Francisco
Water
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Public Utilities Commission

The CleanPowerSF logo, featuring the text "CleanPowerSF" in a bold, sans-serif font. "Clean" is green, "Power" is yellow, and "SF" is blue. A thin, curved line arches over the text, transitioning from green to yellow to blue.

CleanPowerSF

CleanPowerSF DAC-GT & CS-GT Budget

PY 2023

1. Budget Forecast PY 2023

Tab	Category	DAC-GT	CSGT	Funding Source
		2023	2023	
1a, 1b	Generation Cost Delta	\$ 395,154	\$ -	GHG Proceeds
	Bill Discount	\$ 233,585	\$ -	PPP Funds
Program Administration				
	Program Management	\$ 61,711	\$ 7,892	PPP Funds
	PG&E CCA Integration Costs	\$ 2,430	\$ -	PPP Funds
	Information Technology	\$ -	\$ -	PPP Funds
	Billing Operations	\$ 27,285	\$ -	PPP Funds
	Regulatory Compliance	\$ 7,311	\$ 2,212	PPP Funds
	Procurement	\$ 18,770	\$ 39,742	PPP Funds
	Program Administration Total	\$ 117,508	\$ 49,846	
	Marketing, Education, and Outreach	\$ 21,801	\$ 17,790	PPP Funds
	Program Total	\$ 768,049	\$ 67,637	
	2023 Program Year Total	\$	\$	835,685

2. 2021 Budget Reconciliation

Tab	Category	DAC-GT			CSGT		
		Forecast	Actual	True-Up	Forecast	Actual	True-Up
1a, 1b	Generation Cost Delta	\$ 130,439	\$ -	\$ (130,439)	\$ -	\$ -	\$ -
	Bill Discount	\$ 38,890	\$ -	\$ (38,890)	\$ -	\$ -	\$ -
Program Administration							
	Program Management	\$ 91,786	\$ 13,243	\$ (78,543)	\$ 51,650	\$ 4,363	\$ (47,286)
	PG&E CCA Integration Costs	\$ 12,856	\$ 15,556	\$ 2,700	\$ 1,263	\$ -	\$ (1,263)
	Information Technology	\$ 16,915	\$ 21,250	\$ 4,335	\$ 16,915	\$ -	\$ (16,915)
	Billing Operations	\$ 34,327	\$ 27,727	\$ (6,601)	\$ 2,217	\$ 127	\$ (2,090)
	Regulatory Compliance	\$ 13,122	\$ 5,940	\$ (7,182)	\$ 3,346	\$ 5,612	\$ 2,265
	Procurement	\$ 41,895	\$ 12,552	\$ (29,343)	\$ 35,666	\$ 16,147	\$ (19,519)
	Program Administration Total	\$ 210,901	\$ 96,267	\$ (114,634)	\$ 111,058	\$ 26,250	\$ (84,808)
	Marketing, Education, and Outreach	\$ 47,913	\$ 4,332	\$ (43,581)	\$ 37,081	\$ 5,585	\$ (31,496)
	Program Total	\$ 428,144	\$ 100,599	\$ (327,544)	\$ 148,139	\$ 31,834	\$ (116,304)
	2021 Program Year Forecasted Total	\$	\$	\$	\$	\$	576,282
	2021 Program Year Actual Totals	\$	\$	\$	\$	\$	132,434
	2021 Program Year True Up	\$	\$	\$	\$	\$	(443,849)

3. Program Capacity and Procurement Summary PY 2021

Existing Capacity

Category	DAC-GT	CSGT
Existing Program capacity (MW)*	1.826	0
Participating Customers	0	0

Planned Capacity

Category	DAC-GT		CSGT	
	2022	2023	2022	2023
Estimated Capacity to be Procured (MW)	1.826	1.826	0	0.5525
Forecasted Customer Enrollment	1,234	1,234	0	0

*Interim resource

APPENDIX C – AL 21E

CleanPowerSF Disadvantaged Communities Green Tariff and CleanPowerSF
Community Solar Green Tariff Marketing, Education and Outreach Plan for
Program Year 2023



I. Purpose and Goals

The overarching goal of the CleanPowerSF DAC-GT and CSGT programs is to provide low-income customers living in disadvantaged communities (“DACs”) with access to the benefits of 100 percent renewable energy at a 20 percent discount on their electricity bills.

CleanPowerSF will build upon the previous program years and continue to execute a targeted customer marketing, education, and outreach (“ME&O”) Plan to CleanPowerSF customers living in disadvantaged communities to make them aware of the opportunity to enroll in and benefit from the CleanPowerSF DAC Green Tariff and CleanPowerSF Community Solar Green Tariff programs.

This ME&O Plan has five main goals targeted to customers in DACs served by the CleanPowerSF program:

1. Enroll eligible customers in CleanPowerSF DAC-GT and CleanPowerSF CSGT programs
2. Enhance recognition of and enrollment in the CARE and FERA discount programs
3. Improve customers’ understanding of their energy usage, savings options, rate choices (i.e., TOU) and other customer incentives, discounts, or programs
4. Identify and overcome barriers to renewable energy program participation and leverage best practices to ensure outreach to DAC and hard-to-reach customers is accessible and equitable and
5. Increase awareness of CleanPowerSF as San Francisco’s local, clean electricity provider.

To meet these goals, CleanPowerSF 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 newsletters, social media, geo-targeted ads, email and direct mail; and
- Direct customer outreach and partnerships with community-based organizations (CBOs) and local government agencies.

Ultimately, CleanPowerSF will measure ME&O program success by the number of customers enrolled in the DAC-GT and CSGT programs. CleanPowerSF will also measure program success by the overall number and diversity of customers reached.

II. Guiding Principles

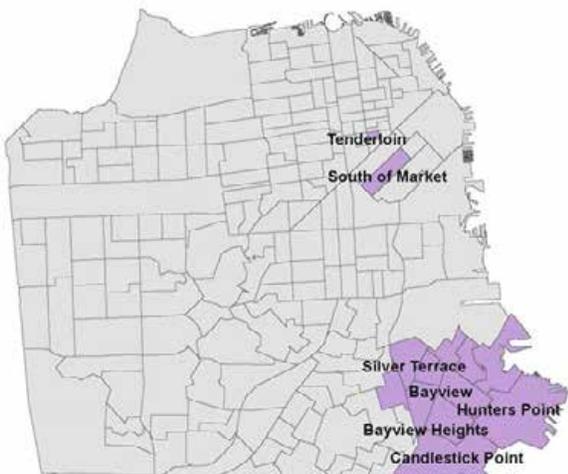
CleanPowerSF is committed to developing culturally appropriate communication strategies to ensure that stakeholders can participate in decisions and actions that impact their communities. As such, CleanPowerSF commits to the following guiding principles throughout the ME&O engagement process for the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

- Achieve diverse and meaningful engagement that reflects the demographics of San Francisco DAC communities to ensure equitable outreach across race, income, ability, language preferences, and age
- 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
- Build a collaborative process with community partners to ensure barriers to participation are overcome and benefits to participation are maximized in ME&O activities.

III. Target Audiences

In accordance with the DAC-GT and CSGT program eligibility criteria, the primary target audience is CleanPowerSF customers who are low-income (eligible for CARE/FERA) and live in DACs. Based on CalEnviroScreen 4.0, CleanPowerSF's service territory includes 14 DAC census tracts with an estimated 6,600 eligible residential CleanPowerSF customer accounts.

Figure 1: DACs in San Francisco (CalEnviroScreen 4.0)



The following are the specific census tracts in descending CalEnviroScreen 4.0 order:

- 6075023200
- 6075017902
- 6075023103
- 6075023001
- 6075023400
- 6075023102
- 6075980600
- 6075023300
- 6075061200
- 6075012502
- 6075061000
- 6075017802
- 6075025702
- 6075023003

IV. Outreach and Engagement

To meet our ME&O goals, CleanPowerSF will conduct outreach and engagement that includes a targeted, multilingual and culturally competent approach that addresses the specific needs of DAC communities in San Francisco.

a. **Marketing and Communications**

CleanPowerSF will leverage a wide variety of marketing and communication tactics to promote the DAC-GT and CSGT programs. All materials will be translated (Spanish, Chinese, Filipino and others as identified by community) and will continue to be improved upon throughout the ME&O process to ensure they are culturally competent and effective.

CleanPowerSF will utilize targeted email marketing and direct mail, the latter of which has proven effective for enrollment in customer programs. These tactics may also be supplemented by geo-targeted advertisements on social media or local print neighborhood newspapers.

A variety of communications content will be utilized to support this phase, including flyers, fact sheets, and dedicated webpages for both programs on the CleanPowerSF website.

b. Grassroots Outreach

CleanPowerSF will conduct grassroots outreach to engage directly with residents at community events. To ensure we are attending a wide variety of engaging and impactful events primarily in DACs, we will utilize the expertise of CBO partners as well.

In addition, CleanPowerSF will coordinate with the many other City and County of San Francisco departments already conducting outreach in DAC communities. CleanPowerSF will pursue opportunities to collaborate such as through elected officials' newsletters/communications, constituent task forces, city-sponsored events, other City and County department communication channels, etc.

c. Partnerships with CBOs

Partnering with CBOs is a critical component of CleanPowerSF's ME&O plan. CBOs have intimate knowledge of their communities and will serve as valuable resources for how best to conduct outreach for the CleanPowerSF DAC-GT and CSGT programs.

CleanPowerSF has solicited CBO participation for CleanPowerSF's DAC-GT and CSGT program outreach through the [PUC.PRO.0218 request for proposals \(RFP\)](#). CleanPowerSF anticipates that three-year contracts to six CBOs will be awarded in Spring 2022. Winning CBOs will enroll qualifying residents into the CleanPowerSF DAC as well as engage with their community members on the CARE and FERA discount programs, general information on clean energy benefits, and other tasks. CleanPowerSF and each CBO will check in regularly to gauge process, discuss tactics, exchange feedback, etc.

While CleanPowerSF does not expect to offer the CSGT program in 2023, outreach and education work will need to be conducted to lay the groundwork for a successful renewable energy project solicitation and program launch. Per CPUC program rules, Community Solar Green Tariff bids must be accompanied by a letter of support from a project sponsor and a demonstration of sufficient community support for the project to justify the proposed project size. CleanPowerSF has learned a number of valuable lessons from outreach conducted with local CBOs to date in support of its 2021 solicitation for renewable energy supplies for the DAC programs. Among them is the importance of building relationships with community residents. CleanPowerSF customers who might benefit from the community solar program may be hesitant to indicate their interest in the program if they are not familiar with the project sponsor or the CSGT program. To address this, CleanPowerSF plans to conduct outreach with potential project sponsors to ensure trusted community organizations are aware of the project sponsorship opportunity. Additionally, CleanPowerSF plans to leverage the CBO contracts awarded through its PRO.0218 RFP to increase awareness of discount programs available to customers, including CARE, FERA, and the DAC programs. It is CleanPowerSF's expectation that improving awareness of these discount programs will increase enrollment. The benefits of increased CARE/FERA enrollment are twofold: 1) Customers who are eligible for bill discounts under CARE/FERA will receive them even

before CSGT program launch and 2) There will be larger pool of income-eligible customers to conduct CSGT outreach to when CleanPowerSF is ready to enroll customers. This will facilitate meeting the 50% low-income threshold required by the CPUC for a CSGT project.

V. ME&O Evaluation

Because CleanPowerSF is using multiple tactics for ME&O, a variety of metrics will be used to evaluate the effectiveness of each effort:

- Total number of residents reached
 - Direct (in-person contacts)
 - In-direct (impressions, views)
- Total CleanPowerSF DAC-GT and CleanPowerSF CSGT enrollees
- Total CARE and FERA enrollment achieved through CleanPowerSF’s DAC-GT and CSGT outreach
- Website visits and page views
- Email click-through and open rates
- Direct mail reach and/or response rates
- Phone calls and emails to our Call Center
- Diversity in race, age and event participants with participation that reflects the census distribution demographics of the DAC communities
- Digital communications engagement and impressions
- Total number of events or avenues and distribution of events/avenues by neighborhood.

By regularly monitoring these metrics, CleanPowerSF will be able to make changes in its approach or shift the mix of ME&O channels to improve the effectiveness of outreach, as necessary.

VI. ME&O Budget

CleanPowerSF’s total ME&O budget proposal for PY 2023 is \$39,592. Table 1 below includes a summary of the budget by cost category.

Table 1: CleanPowerSF’s Proposed ME&O Budget for PY 2023

Item	2023	
	DAC-GT	CSGT
General Marketing	\$3,000.00	\$2,000.00
Targeted Marketing	\$3,000.00	\$1,000.00
CBO Engagement	\$10,000.00	\$10,000.00
Staff Time	\$5,801.12	\$4,790.24

Total	\$21,801.12	\$17,790.24
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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Develop a
Successor to Existing Net Energy Metering
Tariffs Pursuant to Public Utilities Code Section
2827.1, and to Address Other Issues Related to
Net Energy Metering.

R.14-07-002
(Filed July 10, 2014)

A. 16-07-015
(Filed July 25, 2016)

(Consolidated)

And Related Matter.

**DECLARATION OF MICHAEL A. HYAMS IN SUPPORT OF CONFIDENTIAL
TREATMENT OF DATA AND INFORMATION CONTAINED IN APPENDIX B OF
CLEANPOWRSF ADVICE LETTER 21-E: DISADVANTAGED COMMUNITIES GREEN
TARIFF AND COMMUNITY SOLAR GREEN TARIFF PROGRAM YEAR 2023 BUDGET
AND MARKETING, EDUCATION, AND OUTREACH PLAN**

I, Michael A. Hyams declare and state:

1. I am the Director of the CleanPowerSF program. As such, I have responsibility and oversight of CleanPowerSF's energy procurement, policy, compliance, and reporting. CleanPowerSF is the community choice aggregator ("CCA") for the City and County of San Francisco.
2. I have been authorized by Barbara Hale, Assistant General Manager for Power of the San Francisco Public Utilities Commission, to make this Declaration on behalf of CleanPowerSF.
3. I am making this Declaration in accordance with California Public Utilities Commission General Order (GO) 66-D, Decisions (D.) 06-06-066, D.08-04-023, D.21-11-029, and the CCA and ESP Confidentiality Matrix accompanying those decisions, which governs the submission of confidential energy procurement and market-sensitive information to the Commission for Community Choice Aggregators.¹

¹ D.20-07-005, pp. 3-5.

4. Attachment A to this Declaration contains a table identifying the data and information for which CleanPowerSF seeks confidential treatment. Attachment A is incorporated by reference in its entirety into this Declaration.
5. The table specifies that the material CleanPowerSF seeks to protect constitutes confidential, market-sensitive data and information covered by D.06-06-066, D.08-04-023, D.20-07-005, and GO 66-D.
6. CleanPowerSF is required to file a Tier 2 advice letter for its Disadvantaged Communities Green Tariff and Community Solar Green Tariff Program Year 2023 Budget and Marketing, Education, and Outreach Plan.
7. Attachment A to this Declaration contains a table identifying the data and information provided in response to the Data Request for which CleanPowerSF is seeking confidential treatment. Attachment A is incorporated by reference in its entirety into this Declaration.
8. The attached table specifies that the material CleanPowerSF is seeking to protect constitutes confidential, market-sensitive data and information covered by GO 66-D, D.06-06-066, D.08-04-023, D.21-11-029, and the ESP and CCA Confidentiality Matrix accompanying those Decisions.
9. As demonstrated in the attached table, the categories of information for which CleanPowerSF seeks confidential protection are consistent with categories of information that are treated as confidential and are reasonably tailored to address confidentiality concerns.
10. In addition, the Commission has discretion to determine whether the public interest in keeping confidential materials confidential outweighs the public interest in making them public.²
11. The Commission has also determined that data that does not fall precisely within a Confidentiality Matrix category but which “consists of information from which [Matrix

² D.06-06-066, as modified by D.07-05-032, pgs. 5-6. “[T]he test for non-disclosure to the public includes whether ‘the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.’ (See e.g., Gov. Code, §6255, subd. (a).)”

category] information may be easily derived” is eligible for the confidential treatment specified in the corresponding Confidentiality Matrix category.³

12. CleanPowerSF is complying with the limitations on confidentiality specified for the particular type of data, as listed in the table.
13. The data and information listed in the table are not already public, and due to the format of the reporting templates cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure.
14. I have personal knowledge of the facts and representations herein, except for those facts expressly stated to be based upon information and belief, and as to those matters, I believe them to be true.
15. Based on the foregoing, I make this Declaration supporting the confidential treatment of data and information contained in Appendix B of CleanPowerSF Advice Letter 21-E:
CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff Program Year 2023 Budget and Marketing, Education, and Outreach Plan.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 1, 2022, at San Anselmo, California.

By: 
MICHAEL A. HYAMS
Director, CleanPowerSF
San Francisco Public Utilities Commission,
Power Enterprise
525 Golden Gate Avenue, 7th Floor
San Francisco, CA. 94103
Phone: (415) 554-1590
Email: mhyams@sflower.org

³ See, e.g., R.06-05-027, *Administrative Law Judge's Ruling on San Diego Gas & Electric Company's April 3, 2007 Motion to File Data Under Seal*, p. 2 (May 4, 2007).

DECLARATION OF MICHAEL A. HYAMS IN SUPPORT OF CONFIDENTIAL TREATMENT OF DATA AND INFORMATION CONTAINED IN APPENDIX B OF CLEANPOWERSF ADVICE LETTER 21-E - ATTACHMENT A – TABLE OF CONFIDENTIAL INFORMATION

Confidential Data or Information	Confidentiality Category	Justification for Confidential Treatment	Length of Time for Data to be Treated as Confidential
<p>Appendix B of CleanPowerSF Advice Letter 21-E, Calculation of Generation Cost Delta DAC-GT page.</p> <p>(Confidential information highlighted in yellow)</p>	<p>IOU Matrix § VIII.A. Competitive Solicitation (Bidding) Information – Electric - Bid Information.</p> <p>General Order 66-D, specifically Government Code section 6254(k) and Evidence Code section 1060 (regarding “trade secrets”); and Government Code section 6255(a) (regarding the public interest exemption under the California Public Records Act)</p>	<p>The workpapers contain information regarding CleanPowerSF’s confidential price-related information and projections regarding the outcome of its solicitation. This includes an estimate of bid price information which is highly confidential and market-sensitive. If released, this information would allow market participants to adversely affect CleanPowerSF’s solicitation and consequently, negatively impact the ability of CleanPowerSF to procure the necessary resources. Although the IOU Matrix does not directly apply to CCAs, the listed category in the IOU matrix protects this type of information from disclosure and provides support for the confidentiality request. Disclosure of projected RPS contract prices, or data from which this information could easily be derived, would provide valuable market-sensitive information to market participants regarding RPS transactions.</p>	<p>3 years</p>
<p>Appendix B of CleanPowerSF Advice Letter 21-E, Calculation of Generation Cost Delta DAC-GT and CSGT pages</p>	<p>CCA and ESP Matrix § III.B. III.D. (Total Peak Demand Load Forecast (MW)).</p> <p>General Order 66-D, specifically Government Code section</p>	<p>The specified information from this Appendix corresponds to the listed ESP Confidentiality Matrix categories; it includes confidential and highly-sensitive market information. Disclosure of such valuable market information would enable any</p>	<p>3 years</p>

DECLARATION OF MICHAEL A. HYAMS IN SUPPORT OF CONFIDENTIAL TREATMENT OF DATA AND INFORMATION CONTAINED IN APPENDIX B OF CLEANPOWERSF ADVICE LETTER 21-E - ATTACHMENT A – TABLE OF CONFIDENTIAL INFORMATION

<p>(Confidential information highlighted in yellow)</p>	<p>6254(k) and Evidence Code section 1060 (regarding “trade secrets”); and Government Code section 6255(a) (regarding the public interest exemption under the California Public Records Act)</p>	<p>interested person to identify CleanPowerSF’s procurement requirements. If released, this information would allow market participants to compromise the capacity markets, and consequently, negatively impact the ability of CleanPowerSF to procure resource adequacy capacity on terms favorable to its ratepayers.</p> <p>In addition, release of this information would compromise the available markets for capacity, and allow dominant market participants to exercise market power and manipulate compliance with the Commission’s RA program. As a consequence, there would be a severe negative impact on the ability of CleanPowerSF to negotiate and procure RA capacity on terms reasonable for its ratepayers. The public interest served by disclosing this information is clearly outweighed by the public interest in withholding such information from disclosure, given the sensitivity of the information and the potential harm that would be caused by its disclosure. This information should be protected as confidential, market-sensitive information.</p>	
<p>Appendix B of CleanPowerSF Advice Letter 21-E, 20% Bill Discount page</p>	<p>General Order 66-D, specifically Government Code section 6254(k) and Evidence Code section 1060 (regarding “trade</p>	<p>The workpapers contain information regarding CleanPowerSF’s confidential price-related information, including proprietary rate projections provided to</p>	<p>3 years.</p>

DECLARATION OF MICHAEL A. HYAMS IN SUPPORT OF CONFIDENTIAL TREATMENT OF DATA AND INFORMATION CONTAINED IN APPENDIX B OF CLEANPOWERSF ADVICE LETTER 21-E - ATTACHMENT A – TABLE OF CONFIDENTIAL INFORMATION

<p>(Confidential information highlighted in yellow)</p>	<p>secrets”); and Government Code section 6255(a) (regarding the public interest exemption under the California Public Records Act)</p>	<p>CleanPowerSF on a confidential basis. Disclosure of such valuable, highly sensitive market information would enable any interested person to identify in detail CleanPowerSF’s confidential cost/price information. This information must be protected as market-sensitive and/or trade secret information. Even if no other authority is applied to protect this information, the Commission must protect it because the public interest in protecting the information outweighs the public interest in disclosure, given that it is valuable market sensitive information and the potential harm that would be caused by its disclosure. In contrast, the public interest in public disclosure of pricing and forecasting for a single load serving entity is minimal. Further, CleanPowerSF received the confidential information under an expectation of confidentiality, including confidential expert projections of future rates. Additionally, any values that can be used to back calculate this information should also be kept confidential.</p>	
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**BEFORE THE BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Develop a
Successor to Existing Net Energy Metering
Tariffs Pursuant to Public Utilities Code Section
2827.1, and to Address Other Issues Related to
Net Energy Metering.

R.14-07-002
(Filed July 10, 2014)

A. 16-07-015
(Filed July 25, 2016)

(Consolidated)

CERTIFICATE OF SERVICE

I, Paula Fernandez, declare that I am an employee of the City and County of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action. My business address is City and County of San Francisco, Office of the City Attorney, 1 Dr. Carlton B. Goodlett Place, Room 234, San Francisco, CA 94102.

On **February 1, 2022**, I served:

- **CleanPowerSF Advice Letter 21-E: CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff Program Year 2023 Budget and Marketing, Education, and Outreach Plan [Public Version]; and**
- **Declaration of Michael A. Hyams In Support Of Confidential Treatment Of Data And Information Contained In Appendix B of Cleanpowrsf Advice Letter 21-E: Disadvantaged Communities Green Tariff And Community Solar Green Tariff Program Year 2023 Budget And Marketing, Education, And Outreach Plan** via electronic mail on all parties in Proceeding No. **R.14-07-002 and A.16-07-015** (consolidated).

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on **February 1, 2022** in San Francisco, California.

s/Paula Fernandez
Paula Fernandez