



# 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Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: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 proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<sup>1</sup>Discuss 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](mailto: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	

May 18, 2023

California Public Utilities Commission  
Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

**RE: CleanPowerSF Supplemental Advice Letter 26-E-A  
CleanPowerSF Disadvantaged Communities Green Tariff Program Year  
2024 Revised Budget and Corrected Program Year 2022 Budget  
Reconciliation (Public Version)**

**Purpose**

CleanPowerSF respectfully submits this supplemental Tier 2 Advice Letter requesting approval of its Disadvantaged Communities Green Tariff (“DAC-GT”) revised 2024 program year budget and corrected 2022 program year budget reconciliation. Ordering Paragraph (“OP”) 2 of California Public Utilities Commission (“Commission”) Resolution E-4999, issued June 3, 2019, requires the investor-owned-utilities (IOUs) to annually submit their separate budget estimates for each program. Commission Resolution E-5124 issued on April 16, 2021 extended this requirement to CleanPowerSF. On January 26, 2023, CleanPowerSF requested an extension of time for filing its DAC-GT and CSGT budget advice letter to April 3, 2023, citing the challenge of providing complete accounting for prior year expenses. The Commission approved this request on February 1, 2023.

**Background**

CleanPowerSF submitted Tier 2 Advice Letter 26-E requesting approval of its 2024 DAC-GT and CSGT program budgets and marketing, education and outreach (“ME&O”) plan on April 3, 2023. On April 18, 2023, Pacific Gas & Electric staff alerted CleanPowerSF that two items required revision:

- Removal of the CCA integration costs in the 2024 budget forecast: PG&E explained that it budgeted and requested these funds for CCA integration in its AL 6905-E. So, there was no need for CleanPowerSF to include it

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CleanPowerSF is committed to protecting customer privacy. Learn more at [cleanpowersf.org/privacy](https://cleanpowersf.org/privacy).

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**London N. Breed**  
Mayor

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Vice President

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Commissioner

**Anthony Rivera**  
Commissioner

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Commissioner

**Dennis J. Herrera**  
General Manager



in its budget. CleanPowerSF removes this amount -- \$4,000 -- from its budget.

- Correction of 2022 projected CSGT costs: PG&E explained that CleanPowerSF's 2022 reconciliation for CSGT incorrectly captured the forecast from 2021 rather than 2022.

In addition, CleanPowerSF also updates the 2022 DAC-GT actual Generation Cost Delta based on final customer electricity consumption figures.

### **Discussion**

CleanPowerSF submits this supplemental Tier 2 Advice Letter to revise its 2024 DAC-GT budget and correct the 2022 budget reconciliation. These program budgets are attached to this Advice Letter as the following appendices:

- Appendix A: Revised Program Budgets for CleanPowerSF Program Year 2024 (clean);
- Appendix B (Confidential): Workpapers supporting the calculation of the above market generation costs and 20% bill discount (revised); and
- Appendix C: Revised Program Budgets for CleanPowerSF Program Year 2024 (redline);

CleanPowerSF has revised the DAC-GT program budget to remove CCA integration costs from its 2024 budget because PG&E included these costs in its budget advice letter 6905-E; these costs reflect expenses incurred by PG&E to facilitate ongoing implementation of CCA DAC-GT and CSGT programs.<sup>1</sup> Table 1 summarizes CleanPowerSF's total program budgets for Program Year 2024 without the PG&E CCA Integration Costs.

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<sup>1</sup> Resolution E-5124, p. 11 (OP No. 1).

**Table 1. CleanPowerSF DAC-GT and CSGT 2024 Budgets**

Category	DAC-GT	CSGT
	2024	2024
Generation Cost Delta	\$ 400,259	\$ -
Bill Discount	\$ 254,168	\$ -
<b>Program Administration</b>		
Program Management	\$ 72,097	\$ 27,970
PG&E CCA Integration Costs	\$ -	\$ -
Information Technology	\$ -	\$ -
Billing Operations	\$ 7,419	\$ -
Regulatory Compliance	\$ 5,386	\$ 1,630
Procurement	\$ 30,131	\$ 18,287
<b>Program Administration Total</b>	<b>\$ 115,033</b>	<b>\$ 47,887</b>
Marketing, Education, and Outreach	\$ 33,081	\$ 33,081
<b>Program Total</b>	<b>\$ 802,541</b>	<b>\$ 80,968</b>
<b>2024 Program Year Total</b>	<b>\$</b>	<b>883,509</b>

**1. CleanPowerSF’s 2024 DAC-GT Budget**

As shown below in Table 2, CleanPowerSF’s 2024 DAC-GT budget does not exceed the 4% ME&O budget cap established in Resolution E-4999 for the third program year.<sup>2</sup> There are no changes to the 2024 ME&O budget that was presented in Advice Letter 26-E.

**Table 2. CleanPowerSF DAC-GT Budget**

	Total	% of Budget
Generation Cost Delta	\$ 400,259	50%
20% Bill Discount	\$ 254,168	32%
Program Administration	\$ 115,033	14%
ME&O	\$ 33,081	4%
<b>Total</b>	<b>\$ 802,541</b>	<b>100%</b>

The program administration cost category exceeds the 10% cap, representing 14% of the total program budget, in part, because 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

<sup>2</sup> Resolution E-4999, p. 67 (OP No. 2).

program administration budget exceeds the 10% cap. CleanPowerSF requests its exceedance be approved to facilitate CleanPowerSF's compliance with the program requirements.

## 2. CleanPowerSF's 2022 Budget Reconciliation

The 2022 DAC-GT and CSGT budgets were submitted via Tier 1 Advice Letter on June 14, 2021, for CleanPowerSF's DAC-GT and CSGT program year.<sup>3</sup> Advice Letter 26-E mistakenly used the 2021 CSGT forecast. This supplemental Advice Letter instead replaces the 2021 CSGT forecast with the correct 2022 CSGT forecast. CleanPowerSF also updates the 2022 DAC-GT actual Generation Cost Delta based on final customer electricity consumption figures. Based on this, CleanPowerSF has unspent 2022 funds totaling \$1,004,312 and requests that this remaining amount be carried forward in 2024. The table below ("Table 3") summarizes CleanPowerSF's total budget request by program for Program Year 2024.

**Table 3. CleanPowerSF New Budget Request**

	DAC-GT	CSGT	Total
Budget Carry-Over from PY 2022	\$ (845,889)	\$ (158,423)	\$ (1,004,312)
New Budget Request for PY 2024	\$ 802,541	\$ 80,968	\$ 883,509
Requested PY 2024 Budget (Net of Carry-Over)	\$ (43,348)	\$ (77,455)	\$ (120,804)

### **Effective Date**

Pursuant to General Order 96-B, Industry Rule 7.5.2 CleanPowerSF requests that this Tier 2 Advice Letter become effective within less than 30 days of submission.

### **Tier Designation**

This Advice Letter has a Tier 2 designation pursuant to OP 3 of Resolution E-5125.<sup>4</sup>

### **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 CleanPowerSF Supplemental Advice Letter 26-E-A: CleanPowerSF Disadvantaged Communities Green Tariff and CleanPowerSF

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<sup>3</sup> CleanPowerSF Advice Letter 15-E.

<sup>4</sup> Resolution E-5125, p. 11 (OP No. 3).

Community Solar Green Tariff Bill Discount and Generation Cost Delta Workpapers for Program Year 2024 (revised)” 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. Protests should be submitted to:

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

Cheryl Taylor  
Operations Manager, CleanPowerSF  
San Francisco Public Utilities Commission  
525 Golden Gate Avenue, 7<sup>th</sup> Floor  
San Francisco, CA 94102  
Email: [ctaylor@sfgwater.org](mailto:ctaylor@sfgwater.org)  
Facsimile: 415-934-3982

**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 415-703-2021 or by electronic mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).



**Conclusion**

CleanPowerSF respectfully requests the Commission approve the budgets in Advice Letter 26-E, including the revised DAC-GT budget and reconciled 2022 budget in Appendix A. Appendices A and B of this supplemental Advice Letter should replace Appendices A and B in the original Advice Letter.



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Michael A. Hyams

Director, CleanPowerSF

San Francisco Public Utilities Commission

525 Golden Gate Avenue, 7<sup>th</sup> Floor

San Francisco, CA 94102

Email: [MHyams@sfgwater.org](mailto:MHyams@sfgwater.org)

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

# APPENDIX A – AL 26E-A

CleanPowerSF Disadvantaged Communities Green Tariff and CleanPowerSF  
Community Solar Green Tariff Programs  
Revised Budget Forecast for Program Year 2024



San Francisco  
**Water**  
**Power**  
**Sewer**

Services of the San Francisco  
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**

## 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 and E-5124, CleanPowerSF hereby submits this budget forecast for its Disadvantaged Communities Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT) programs for Program Year 2024 and actual costs for Program Year 2022.

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

Resolution E-4999 and Resolution E-5124 require estimated budget forecasts to be presented for the proposed program and to include the following items:

- Generation cost delta, if any<sup>1</sup>
- 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;
- Forecasted capacity for procurement in the upcoming PY;

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<sup>1</sup> 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.”

- 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 Supplemental Advice Letter 26-E-A, Appendix B*, these two calculations are confidential and not included in the public Advice Letter filing.

### III. Budget Forecast for Program Year 2024

For program year 2024 CleanPowerSF requests a total budget of \$883,509 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 2024 Budget Forecast

Category	DAC-GT	CSGT
	2024	2024
Generation Cost Delta	\$ 400,259	\$ -
Bill Discount	\$ 254,168	\$ -
<b>Program Administration</b>		
Program Management	\$ 72,097	\$ 27,970
PG&E CCA Integration Costs	\$ -	\$ -
Information Technology	\$ -	\$ -
Billing Operations	\$ 7,419	\$ -
Regulatory Compliance	\$ 5,386	\$ 1,630
Procurement	\$ 30,131	\$ 18,287
<b>Program Administration Total</b>	<b>\$ 115,033</b>	<b>\$ 47,887</b>
Marketing, Education, and Outreach	\$ 33,081	\$ 33,081
<b>Program Total</b>	<b>\$ 802,541</b>	<b>\$ 80,968</b>
<b>2024 Program Year Total</b>	<b>\$</b>	<b>883,509</b>

The following sections provide more detail and clarifying notes on the budget categories.

#### a. Generation Cost Delta

CleanPowerSF anticipates issuing a new solicitation for new DAC-GT and CSGT resources during 2023, with a goal of procuring resources that can come online by the end of 2025.

CleanPowerSF issued an RFO for DAC-GT portfolio resources on September 13, 2021; bids were due on December 15, 2021. CleanPowerSF notified a successful bidder of its selection on July 21, 2022 and commenced exclusive negotiations soon afterward. Unfortunately, no executed PPA resulted from this solicitation because CleanPowerSF terminated negotiations with the prospective counterparty after determining that the project would not conform to CleanPowerSF's development timeline, and thus was not viable for CleanPowerSF, due to late-arising problems with permitting. CleanPowerSF has procured interim resources through a bilateral contract with Marin Clean Energy ("MCE") through the end of 2026. 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,<sup>2</sup> 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 Advice Letter 26-E.

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<sup>2</sup> Resolution E-5124 at p. 12.

## 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.<sup>3</sup> 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.<sup>4</sup>

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	14%	59%
Marketing, Education and Outreach	4%	41%

CleanPowerSF's proposed DAC-GT ME&O budget does not exceed the cap. However, the CSGT ME&O budget as well as both program's proposed Program Administration budgets do exceed the CPUC's budget caps in Resolution E-4999.

CleanPowerSF notes that 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. CleanPowerSF anticipates issuing another solicitation for the CSGT program during 2023 with the goal of procuring resources that can come on-line by the end of 2025. Notwithstanding, there will 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 during 2024. 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.<sup>5</sup> 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 2022

CleanPowerSF submitted its PY 2021 and PY 2022 budgets with the implementation plan filed as CleanPowerSF Advice Letter 12-E on December 31, 2020; it was approved with

<sup>3</sup> 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.

<sup>4</sup> Resolution E-5125 at p. 2.

<sup>5</sup> Resolution E-5125, Findings and Conclusion No. 12.

modifications in Resolution E-5124. As a result, CleanPowerSF submitted updated PY 2021 and PY 2022 budgets for both DAC-GT and CSGT programs in CleanPowerSF Advice Letter 15-E on June 14, 2021. PY 2022 was CleanPowerSF's second DAC-GT and CSGT program year. The table below summarizes actual spend against forecasted amounts for each of the budget categories.

*Table 3 Forecast-to-Actual PY 2022 Expenses*

Category	DAC-GT			CSGT		
	Forecast	Actual	True-Up	Forecast	Actual	True-Up
Generation Cost Delta	\$ 527,955	\$ 4,584	\$ (523,371)	\$ -	\$ -	\$ -
Bill Discount	\$ 160,227	\$ 10,313	\$ (149,915)	\$ -	\$ -	\$ -
<b>Program Administration</b>						
Program Management	\$ 63,916	\$ 20,174	\$ (43,742)	\$ 76,421	\$ 3,161	\$ (73,260)
PG&E CCA Integration Costs	\$ 31,014	\$ 3,941	\$ (27,073)	\$ 31,014	\$ -	\$ (31,014)
Information Technology	\$ 8,844	\$ -	\$ (8,844)	\$ 8,844	\$ -	\$ (8,844)
Billing Operations	\$ 41,692	\$ 1,240	\$ (40,452)	\$ 8,803	\$ 108	\$ (8,695)
Regulatory Compliance	\$ 4,994	\$ 27,653	\$ 22,659	\$ 1,274	\$ 7,866	\$ 6,592
Procurement	\$ 33,721	\$ 48,188	\$ 14,467	\$ 17,874	\$ 9,093	\$ (8,782)
<b>Program Administration Total</b>	<b>\$ 184,181</b>	<b>\$ 101,196</b>	<b>\$ (82,985)</b>	<b>\$ 144,230</b>	<b>\$ 20,228</b>	<b>\$ (124,002)</b>
Marketing, Education, and Outreach	\$ 95,795	\$ 6,177	\$ (89,618)	\$ 35,033	\$ 611	\$ (34,422)
<b>Program Total</b>	<b>\$ 968,158</b>	<b>\$ 122,269</b>	<b>\$ (845,889)</b>	<b>\$ 179,262</b>	<b>\$ 20,839</b>	<b>\$ (158,423)</b>
<b>2022 Program Year Forecasted Total</b>						<b>\$ 1,147,420</b>
<b>2022 Program Year Actual Totals</b>						<b>\$ 143,108</b>
<b>2022 Program Year True Up</b>						<b>\$ (1,004,312)</b>

CleanPowerSF began serving customers under its DAC-GT program in 2022, therefore all funds budgeted for the bill discount and generation cost delta should be carried forward to future program years. Actual DAC-GT expenses totaled \$122,269, \$845,889 less than what was budgeted. CSGT expenses totaled \$20,839, \$158,423 less than budgeted. These excess funds shall be carried forward to future program years.

## VI. Program Year 2024 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 2024 total of (\$43,348) for DAC-GT and (\$77,455) for CSGT.

*Table 4 CleanPowerSF PY 2024 Budget Request*

	DAC-GT	CSGT	Total
Budget Carry-Over from PY 2022	\$ (845,889)	\$ (158,423)	\$ (1,004,312)
New Budget Request for PY 2024	\$ 802,541	\$ 80,968	\$ 883,509
Requested PY 2024 Budget (Net of Carry-Over)	\$ (43,348)	\$ (77,455)	\$ (120,804)

## VII. Program Capacity and Enrollment Caps

CleanPowerSF includes forecasted program capacity and enrollment in Table 5 and Table 6 below. CleanPowerSF began serving customers under its DAC-GT program in June 2022. CleanPowerSF does not anticipate operating a CSGT program in 2024, but is planning to procure supply to support program operations by 2025, depending on the results of its power supply procurement activities.

*Table 5 DAC Green Tariff Capacity and Enrollment Forecasts*

	2024
Interim Capacity Procured	1.826 MW
Estimated New Capacity to be Procured	1.826 MW
Estimated Customer Enrollment	1,237

*Table 6 Community Solar Green Tariff Capacity and Enrollment Forecasts*

	2024
Estimated Capacity to be Procured	0
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.

## 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 26E-A

CleanPowerSF Disadvantaged Communities Green Tariff and CleanPowerSF  
Community Solar Green Tariff  
Discount and Generation Cost Delta Workpapers for Program Year 2024

**PUBLIC VERSION**



Services of the San Francisco  
Public Utilities Commission



## CleanPowerSF DAC-GT & CS-GT Budget

PY 2024

### 1. Budget Forecast PY 2024

Category	DAC-GT	CSGT
	2024	2024
Generation Cost Delta	\$ 400,259	\$ -
Bill Discount	\$ 254,168	\$ -
<b>Program Administration</b>		
Program Management	\$ 72,097	\$ 27,970
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Information Technology	\$ -	\$ -
Billing Operations	\$ 7,419	\$ -
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<b>2024 Program Year Total</b>	<b>\$</b>	<b>883,509</b>

### 2. 2022 Budget Reconciliation

Category	DAC-GT			CSGT		
	Forecast	Actual	True-Up	Forecast	Actual	True-Up
Generation Cost Delta	\$ 527,955	\$ 4,584	\$ (523,371)	\$ -	\$ -	\$ -
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Program Management	\$ 63,916	\$ 20,174	\$ (43,742)	\$ 76,421	\$ 3,161	\$ (73,260)
PG&E CCA Integration Costs	\$ 31,014	\$ 3,941	\$ (27,073)	\$ 31,014	\$ -	\$ (31,014)
Information Technology	\$ 8,844	\$ -	\$ (8,844)	\$ 8,844	\$ -	\$ (8,844)
Billing Operations	\$ 41,692	\$ 1,240	\$ (40,452)	\$ 8,803	\$ 108	\$ (8,695)
Regulatory Compliance	\$ 4,994	\$ 27,653	\$ 22,659	\$ 1,274	\$ 7,866	\$ 6,592
Procurement	\$ 33,721	\$ 48,188	\$ 14,467	\$ 17,874	\$ 9,093	\$ (8,782)
<b>Program Administration Total</b>	<b>\$ 184,181</b>	<b>\$ 101,196</b>	<b>\$ (82,985)</b>	<b>\$ 144,230</b>	<b>\$ 20,228</b>	<b>\$ (124,002)</b>
Marketing, Education, and Outreach	\$ 95,795	\$ 6,177	\$ (89,618)	\$ 35,033	\$ 611	\$ (34,422)
<b>Program Total</b>	<b>\$ 968,158</b>	<b>\$ 122,269</b>	<b>\$ (845,889)</b>	<b>\$ 179,262</b>	<b>\$ 20,839</b>	<b>\$ (158,423)</b>
<b>2022 Program Year Forecasted Total</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>1,147,420</b>
<b>2022 Program Year Actual Totals</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>143,108</b>
<b>2022 Program Year True Up</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>(1,004,312)</b>

### 3. Program Capacity and Procurement Summary PY 2022

#### Existing Capacity

Category	DAC-GT	CSGT
Existing Program capacity (MW)*	1.826	0
Participating Customers	176	0

#### Planned Capacity

Category	DAC-GT		CSGT	
	2023	2024	2023	2024
Estimated Capacity to be Procured (MW)	1.826	1.826	0	0
Forecasted Customer Enrollment	1,237	1,237	0	0

\*Interim resource







## APPENDIX C – AL 26E-A

CleanPowerSF Disadvantaged Communities Green Tariff and CleanPowerSF  
Community Solar Green Tariff Programs

Revised Budget Forecast for Program Year 2024



San Francisco  
**Water**  
**Power**  
**Sewer**

Services of the San Francisco  
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**

## 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 and E-5124, CleanPowerSF hereby submits this budget forecast for its Disadvantaged Communities Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT) programs for Program Year 2024 and actual costs for Program Year 2022.

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

Resolution E-4999 and Resolution E-5124 require estimated budget forecasts to be presented for the proposed program and to include the following items:

- Generation cost delta, if any<sup>1</sup>
- 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;
- Forecasted capacity for procurement in the upcoming PY;

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<sup>1</sup> 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.”

- 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 Supplemental Advice Letter 26-E-A, Appendix B*, these two calculations are confidential and not included in the public Advice Letter filing.

### III. Budget Forecast for Program Year 2024

For program year 2024 CleanPowerSF requests a total budget of ~~\$887,509~~883,509 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~~Table 1~~ below:

Table 1 CleanPowerSF 2024 Budget Forecast

Category	DAC-GT	CSGT
	2024	2024
Generation Cost Delta	\$ 400,259	\$ -
Bill Discount	\$ 254,168	\$ -
<b>Program Administration</b>		
Program Management	\$ 72,097	\$ 27,970
PG&E CCA Integration Costs	\$ -	\$ -
Information Technology	\$ -	\$ -
Billing Operations	\$ 7,419	\$ -
Regulatory Compliance	\$ 5,386	\$ 1,630
Procurement	\$ 30,131	\$ 18,287
<b>Program Administration Total</b>	<b>\$ 115,033</b>	<b>\$ 47,887</b>
Marketing, Education, and Outreach	\$ 33,081	\$ 33,081
<b>Program Total</b>	<b>\$ 802,541</b>	<b>\$ 80,968</b>
<b>2024 Program Year Total</b>	<b>\$</b>	<b>883,509</b>



Category	DAC-GT	CSGT
	2024	2024
Generation Cost Delta	\$ 400,259	\$ -
Bill Discount	\$ 254,168	\$ -
<b>Program Administration</b>		
Program Management	\$ 72,097	\$ 27,970
<del>PG&amp;E CCA Integration Costs</del>	<del>\$ 4,000</del>	<del>\$ -</del>
Information Technology	\$ -	\$ -
Billing Operations	\$ 7,419	\$ -
Regulatory Compliance	\$ 5,386	\$ 1,630
Procurement	\$ 30,131	\$ 18,287
<b>Program Administration Total</b>	<b>\$ 119,033</b>	<b>\$ 47,887</b>
Marketing, Education, and Outreach	\$ 33,081	\$ 33,081
<b>Program Total</b>	<b>\$ 806,541</b>	<b>\$ 80,968</b>
<b>2024 Program Year Total</b>	<b>\$ 887,509</b>	<b>\$ 887,509</b>

The following sections provide more detail and clarifying notes on the budget categories.

#### a. Generation Cost Delta

CleanPowerSF anticipates issuing a new solicitation for new DAC-GT and CSGT resources during 2023, with a goal of procuring resources that can come online by the end of 2025. CleanPowerSF issued an RFO for DAC-GT portfolio resources on September 13, 2021; bids were due on December 15, 2021. CleanPowerSF notified a successful bidder of its selection on July 21, 2022 and commenced exclusive negotiations soon afterward. Unfortunately, no executed PPA resulted from this solicitation because CleanPowerSF terminated negotiations with the prospective counterparty after determining that the project would not conform to CleanPowerSF's development timeline, and thus was not viable for CleanPowerSF, due to late-arising problems with permitting. CleanPowerSF has procured interim resources through a bilateral contract with Marin Clean Energy ("MCE") through the end of 2026. 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,<sup>2</sup> 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

<sup>2</sup> Resolution E-5124 at p. 12.

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 Advice Letter 26-E.

## 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.<sup>3</sup> 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.<sup>4</sup>

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	14%	59%
Marketing, Education and Outreach	4%	41%

  

	DAC-GT	CSGT
<del>Program Administration</del>	<del>15%</del>	<del>59%</del>
<del>Marketing, Education and Outreach</del>	<del>4%</del>	<del>41%</del>

<sup>3</sup> 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.

<sup>4</sup> Resolution E-5125 at p. 2.

CleanPowerSF's proposed DAC-GT ME&O budget does not exceed the cap. However, the CSGT ME&O budget as well as both program's proposed Program Administration budgets do exceed the CPUC's budget caps in Resolution E-4999.

~~CleanPowerSF does not expect that a fully automated billing solution between PG&E and its billing provider will be in place during 2024. 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, notes that~~ 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. CleanPowerSF anticipates issuing another solicitation for the CSGT program during 2023 with the goal of procuring resources that can come on-line by the end of 2025. Notwithstanding, there will 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 during 2024. 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.<sup>5</sup> 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 2022

CleanPowerSF submitted its PY 2021 and PY 2022 budgets with the implementation plan filed as CleanPowerSF Advice Letter 12-E on December 31, 2020; it was approved with modifications in Resolution E-5124. As a result, CleanPowerSF submitted updated PY 2021 and PY 2022 budgets for both DAC-GT and CSGT programs in CleanPowerSF Advice Letter 15-E on June 14, 2021. PY 2022 was CleanPowerSF's second DAC-GT and CSGT program year. The table below summarizes actual spend against forecasted amounts for each of the budget categories.

*Table 3 Forecast-to-Actual PY 2022 Expenses*

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<sup>5</sup> Resolution E-5125, Findings and Conclusion No. 12.

Category	DAC-GT			CSGT		
	Forecast	Actual	True-Up	Forecast	Actual	True-Up
Generation Cost Delta	\$ 527,955	\$ 4,584	\$ (523,371)	\$ -	\$ -	\$ -
Bill Discount	\$ 160,227	\$ 10,313	\$ (149,915)	\$ -	\$ -	\$ -
<b>Program Administration</b>						
Program Management	\$ 63,916	\$ 20,174	\$ (43,742)	\$ 76,421	\$ 3,161	\$ (73,260)
PG&E CCA Integration Costs	\$ 31,014	\$ 3,941	\$ (27,073)	\$ 31,014	\$ -	\$ (31,014)
Information Technology	\$ 8,844	\$ -	\$ (8,844)	\$ 8,844	\$ -	\$ (8,844)
Billing Operations	\$ 41,692	\$ 1,240	\$ (40,452)	\$ 8,803	\$ 108	\$ (8,695)
Regulatory Compliance	\$ 4,994	\$ 27,653	\$ 22,659	\$ 1,274	\$ 7,866	\$ 6,592
Procurement	\$ 33,721	\$ 48,188	\$ 14,467	\$ 17,874	\$ 9,093	\$ (8,782)
<b>Program Administration Total</b>	<b>\$ 184,181</b>	<b>\$ 101,196</b>	<b>\$ (82,985)</b>	<b>\$ 144,230</b>	<b>\$ 20,228</b>	<b>\$ (124,002)</b>
Marketing, Education, and Outreach	\$ 95,795	\$ 6,177	\$ (89,618)	\$ 35,033	\$ 611	\$ (34,422)
<b>Program Total</b>	<b>\$ 968,158</b>	<b>\$ 122,269</b>	<b>\$ (845,889)</b>	<b>\$ 179,262</b>	<b>\$ 20,839</b>	<b>\$ (158,423)</b>
<b>2022 Program Year Forecasted Total</b>						<b>1,147,420</b>
<b>2022 Program Year Actual Totals</b>						<b>143,108</b>
<b>2022 Program Year True Up</b>						<b>(1,004,312)</b>

Category	DAC-GT			CSGT		
	Forecast	Actual	True-Up	Forecast	Actual	True-Up
Generation Cost Delta	\$ 527,955	\$ 4,196	\$ (523,759)	\$ -	\$ -	\$ -
Bill Discount	\$ 160,227	\$ 10,313	\$ (149,915)	\$ -	\$ -	\$ -
<b>Program Administration</b>						
Program Management	\$ 63,916	\$ 20,174	\$ (43,742)	\$ 51,650	\$ 3,161	\$ (48,488)
PG&E CCA Integration Costs	\$ 31,014	\$ 3,941	\$ (27,073)	\$ 1,263	\$ -	\$ (1,263)
Information Technology	\$ 8,844	\$ -	\$ (8,844)	\$ 16,915	\$ -	\$ (16,915)
<del>Billing Operations</del>	<del>\$ 41,692</del>	<del>\$ 1,240</del>	<del>\$ (40,452)</del>	<del>\$ 2,217</del>	<del>\$ 108</del>	<del>\$ (2,109)</del>
Regulatory Compliance	\$ 4,994	\$ 27,653	\$ 22,659	\$ 3,346	\$ 7,866	\$ 4,520
Procurement	\$ 33,721	\$ 48,188	\$ 14,467	\$ 35,666	\$ 9,093	\$ (26,574)
<b>Program Administration Total</b>	<b>\$ 184,181</b>	<b>\$ 101,196</b>	<b>\$ (82,985)</b>	<b>\$ 111,058</b>	<b>\$ 20,228</b>	<b>\$ (90,830)</b>
Marketing, Education, and Outreach	\$ 95,795	\$ 6,177	\$ (89,618)	\$ 37,031	\$ 611	\$ (36,470)
<b>Program Total</b>	<b>\$ 968,158</b>	<b>\$ 121,881</b>	<b>\$ (846,277)</b>	<b>\$ 148,139</b>	<b>\$ 20,839</b>	<b>\$ (127,300)</b>
<b>2022 Program Year Forecasted Total</b>						<b>1,116,297</b>
<b>2022 Program Year Actual Totals</b>						<b>142,720</b>
<b>2022 Program Year True Up</b>						<b>(973,577)</b>

CleanPowerSF began serving customers under its DAC-GT program in 2022, therefore all funds budgeted for the bill discount and generation cost delta should be carried forward to future program years. Actual DAC-GT expenses totaled \$~~121,881~~122,269, \$~~846,277~~845,889 less than what was budgeted. CSGT expenses totaled \$20,839, \$~~127,300~~158,423 less than budgeted. These excess funds shall be carried forward to future program years.

## VI. Program Year 2024 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 2024 total of (\$~~39,736~~43,348) for DAC-GT and (\$~~46,332~~77,455) for CSGT.

Table 4 CleanPowerSF PY 2024 Budget Request

	DAC-GT	CSGT	Total
Budget Carry-Over from PY 2022	\$ (845,889)	\$ (158,423)	\$ (1,004,312)
New Budget Request for PY 2024	\$ 802,541	\$ 80,968	\$ 883,509
Requested PY 2024 Budget (Net of Carry-Over)	\$ (43,348)	\$ (77,455)	\$ (120,804)

  

	DAC-GT	CSGT	Total
<del>Budget Carry-Over from PY 2022</del>	<del>\$ (846,277)</del>	<del>\$ (127,300)</del>	<del>\$ (973,577)</del>
<del>New Budget Request for PY 2024</del>	<del>\$ 806,541</del>	<del>\$ 80,968</del>	<del>\$ 887,509</del>
<del>Requested PY 2024 Budget (Net of Carry-Over)</del>	<del>\$ (39,736)</del>	<del>\$ (46,332)</del>	<del>\$ (86,068)</del>

## VII. Program Capacity and Enrollment Caps

CleanPowerSF includes forecasted program capacity and enrollment in ~~Tables~~ [Table 5-5](#) and [Table 6](#) below. CleanPowerSF began serving customers under its DAC-GT program in June 2022. CleanPowerSF does not anticipate operating a CSGT program in 2024, but is planning to procure supply to support program operations by 2025, depending on the results of its power supply procurement activities.

Table 5 DAC Green Tariff Capacity and Enrollment Forecasts

	2024
Interim Capacity Procured	1.826 MW
Estimated New Capacity to be Procured	1.826 MW
Estimated Customer Enrollment	1,237

Table 6 Community Solar Green Tariff Capacity and Enrollment Forecasts

	2024
Estimated Capacity to be Procured	0
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 ERRA forecast application, as directed by the CPUC. Once PG&E receives approval

of its ERRA 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.

## 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.