

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: Kiara Hermann

Phone #:

E-mail: PowerRegulatory@sfwater.org

E-mail Disposition Notice to: PowerRegulatory@sfwater.org

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: CleanPowerSF AL 12-E

Tier Designation: 3

Subject of AL: Approve the Establishment and Implementation of the CleanPowerSF Disadvantaged Communities Green Tariff Program and the CleanPowerSF Community Solar Green Tariff Program.

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Does AL replace a withdrawn or rejected AL?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: No

Summarize differences between the AL and the prior withdrawn or rejected AL: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: PowerRegulatory@sfwater.org

Resolution required? Yes No

Requested effective date:

No. of tariff sheets: 2

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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

Tariff schedules affected:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

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

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

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State: District of Columbia Zip:
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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	



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December 31, 2020

California Public Utilities Commission
Energy Division
Attention: Tariff Unit
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San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

**RE: CleanPowerSF Advice Letter 12-E
Approve the Establishment and Implementation of Disadvantaged
Communities Green Tariff Program and the Community Solar Green Tariff
Program (Public Version)**

Purpose

Pursuant to Ordering Paragraph 17 of Decision (“D.”)18-06-027 *Alternate Decision Adopting Alternatives to Promote Solar Distributed Generation in Disadvantaged Communities* in R.14-07-002, and Resolution E-4999. The City and County of San Francisco (“San Francisco” or “City”) hereby submits this Advice Letter (“AL”) to establish and implement a Disadvantaged Communities Green Tariff (“DAC-GT”) program and a Community Solar Green Tariff (“CSGT”) program for CleanPowerSF, San Francisco’s Community Choice Aggregation (“CCA”) program.

Background

On June 21, 2018, the California Public Utilities Commission (“CPUC”) approved D.18-06-027 adopting three new programs to promote the installation of renewable generation among residential customers in disadvantaged communities (“DAC”) served by investor-owned electric utilities,¹ as directed by the California Legislature in Assembly Bill (“AB”) 327 (Perea, Stats. 2013, ch 611). The three programs include the DAC Single Family Solar Homes (“DAC-

¹ D.18-06-027 defines DACs as communities that are identified in the CalEnviroScreen 3.0 as among the top 25 percent of census tracts statewide, plus the census tracts in the highest five percent of CalEnviroScreen’s Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data. (p. 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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SASH”) program, which provides upfront incentives for the installation of solar at low-income homes in DACs. The other two programs, the DAC-GT and CSGT, are subscription-based programs which offer up to 100% solar energy and provide a 20% discount on the electric portion of participants’ bills. This AL focuses on the latter two programs.

In D.18-06-027, the CPUC allowed CCAs to develop and implement their own DAC-GT and CS-GT programs.² A CCA’s programs and tariffs must abide by all DAC-GT or CSGT rules and requirements adopted in D.18-06-027 and must file a Tier 3 Advice Letter to implement the CCA DAC-GT and CSGT programs. Resolution E-4999 requires that CCA Implementation ALs must be filed on or before January 1, 2021.³

CleanPowerSF is San Francisco’s CCA program developed and operated by the San Francisco Public Utilities Commission (“SFPUC”), an enterprise department of the City. CleanPowerSF was first certified by the CPUC on May 18, 2010 and re-certified on August 25, 2015, following the City’s submission of an updated Implementation Plan for CleanPowerSF. CleanPowerSF began serving customers in May 2016. With an annual operating budget of approximately \$220 million, CleanPowerSF now serves about 380,000 customer accounts.

Discussion

A. Capacity Transfer

Some CCAs in PG&E’s service territory have elected to not pursue one or both of the DAC-GT and CSGT programs and to forego their capacity allocations per Resolution E-4999.⁴ These non-participating CCAs have elected to transfer their allocations to the participating CCAs in PG&E’s service territory. The involved CCAs, both participating and non-participating, have agreed to distribute the transferred capacity in equal parts among the participating CCAs and have signed a joint letter of support to that effect. The letter is attached to this filing as Appendix F. As confirmed in an email with Energy Division staff on November 25, 2020, this letter is being submitted as an alternative to, and in lieu of, these non-participating CCAs submitting separate written comments in response to each participating CCA’s Advice Letter.

1. Capacity Transfers Under the DAC-GT Program

Sonoma Clean Power (“SCP”), Central Coast Community Energy (“3CE”), formerly known as Monterey Bay Community Power, and Silicon Valley Clean Energy (“SVCE”) have determined that they will not implement their own DAC-GT programs and are proposing to transfer their program capacities to the participating CCAs in equal amounts. The CCAs that are planning to implement their own DAC-GT programs include CleanPowerSF, East Bay Community Energy, MCE, Peninsula Clean Energy Authority (“PCE”), and San José Clean

² D.18-06-027, p.104 (Ordering Paragraph 17).

³ Resolution E-4999, p. 16.

⁴ Resolution E-4999, pp. 16 and 54 (Findings and Conclusions No. 17)

Energy (“SJCE”). The following table shows the assigned DAC-GT program capacity for each of the non-participating CCAs per Table 1 in Resolution E-4999, as well as the capacity that is proposed to be transferred to each participating CCA.

Table 1.

Transferring CCA	Capacity Being Transferred (MW)	Receiving CCA				
		CleanPowerSF	EBCE	MCE	PCE	SJCE
SVCE	0.5	0.100	0.100	0.100	0.100	0.100
SCP	0.5	0.100	0.100	0.100	0.100	0.100
3CE	0.68	0.136	0.136	0.136	0.136	0.136
Total	1.68	0.336	0.336	0.336	0.336	0.336

As Table 1 shows, the capacity transfer from the CCAs that are electing to not implement DAC-GT programs would result in an increase of 0.336 MW for each participating CCA. Added to CleanPowerSF’s original program capacity of 1.49 MW, this results in a total program capacity of 1.826 MW for the proposed CleanPowerSF DAC-GT program.

2. Capacity Transfers Under the CSGT Program

SCP, 3CE, SVCE and SJCE have decided to not implement their own CSGT programs and are proposing to transfer their program capacities to the participating CCAs in equal amounts. The CCAs that are planning to implement the CSGT program include CleanPowerSF, EBCE, MCE and PCE. Table 2 below shows the assigned CSGT program capacity for each of the non-participating CCAs per Table 1 in Resolution E-4999, as well as the capacity that is proposed to be transferred to each participating CCA.

Table 2.

Transferring CCA	Capacity Being Transferred	Receiving CCA			
		CleanPowerSF	EBCE	MCE	PCE
SVCE	0.09	0.0225	0.0225	0.0225	0.0225
SCP	0.06	0.0150	0.0150	0.0150	0.0150
3CE	0.18	0.0450	0.0450	0.0450	0.0450
SJCE	0.36	0.0900	0.0900	0.0900	0.0900
Total	0.69	0.1725	0.1725	0.1725	0.1725

As Table 2 above shows, the capacity transfer from the CCAs that are electing to not implement CSGT programs would result in an increase of 0.1725 MW for each participating CCA. Added to the CleanPowerSF program’s original capacity of 0.38 MW, this would result in a total program capacity of 0.5525 MW for the proposed CleanPowerSF CSGT program.

B. San Francisco's Request for Approval of the CleanPowerSF DAC-GT and CleanPowerSF CSGT Programs

The CleanPowerSF DAC-GT and CSGT Implementation Plan, tariffs, program budgets, Marketing, Education and Outreach ("ME&O") Plan and CCA Capacity Transfer Letter are attached to this Advice Letter as the following appendices:

- Appendix A: Implementation Plan for the CleanPowerSF DAC-GT and CSGT Programs;
- Appendix B: Schedule CleanPowerSF DAC-GT, *Disadvantaged Communities Green Tariff Program* and Schedule CleanPowerSF CSGT, *Community Solar Green Tariff Program*;
- Appendix C: Program Budgets for CleanPowerSF Program Years ("PY") 2021 and 2022;
- Appendix D: ME&O Plan for CleanPowerSF PY 2021 and 2022;
- Appendix E (Confidential): Workpapers supporting the calculation of the above market generation costs and 20% bill discount.⁵
- Appendix F: CCA Capacity Transfer Under the DAC-GT and CSGT Programs

San Francisco respectfully requests that the CPUC approve the CleanPowerSF Implementation Plan, tariff sheets, and ME&O plan for the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs, as described in the attached appendices. Furthermore, CleanPowerSF requests that the CPUC approve the proposed budgets for PY 2021 and 2022 as detailed in Appendix C and direct Pacific Gas & Electric Company ("PG&E") to:

- Modify its DAC-GT and CSGT balancing accounts to include a subaccount to track the funding and costs of the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs;
- Include the total forecasted budget for PYs 2021 and 2022 in its 2022 Energy Resource Recovery Account ("ERRA") filings; and
- Upon CPUC approval of CleanPowerSF program funds in PG&E's 2022 ERRA forecast application, transfer funds to CleanPowerSF in annual forward installments. For the 2021 program year, CleanPowerSF requests that PG&E transfer all approved funds within thirty days of CPUC approval of PG&E's 2022 ERRA forecast application.

Additionally, San Francisco requests CPUC approval on the following program implementation proposals. The proposals are discussed in more detail in the CleanPowerSF DAC-GT and CleanPowerSF CSGT Implementation Plan, Appendix A to this Advice Letter. Specifically, San Francisco proposes:

- To auto-enroll eligible customers who are participating in the Arrearage Management Program ("AMP") in the CleanPowerSF DAC-GT.

⁵ The Declaration of Michael A. Hyams in Support of Confidential Treatment of Data and Information Contained in CleanPowerSF's Advice Letter 11-E. Appendix E addresses the confidentiality of this appendix and is submitted concurrently.

- That participants in the CleanPowerSF DAC-GT be subscribed to a percentage of the CleanPowerSF DAC-GT facilities' output, which is how the CPUC has designed the CSGT program, to help ensure DAC-GT compliance with Green-e® Energy program requirements;
- That participants' usage in excess of CleanPowerSF DAC-GT and CleanPowerSF CSGT facilities' generation be met, or balanced, with CleanPowerSF's default Green energy product which is at least 50% RPS-eligible renewable and that this usage be included in the 20% total bill discount provided to participants in the DAC-GT and CSGT programs;
- That it may issue a solicitation to contract with a CleanPowerSF DAC-GT interim resource to expedite its program launch date;
- That customers who move within CleanPowerSF's service territory must re-establish their eligibility for the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs;
- That the value of unsubscribed energy from the CleanPowerSF DAC-GT and CleanPowerSF CSGT facilities be credited to the respective future program year's budget using the value of energy used in the generation cost delta calculation;
- That PG&E transfer CleanPowerSF program funds on a forward basis each year, as approved by the CPUC in PG&E's ERRA application;
- That the CPUC direct PG&E to include program funds for the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs in PG&E's next ERRA forecast application. Additionally, San Francisco requests that the CPUC direct PG&E to transfer all past due funds to San Francisco within 30 days of the CPUC's approval of PG&E's ERRA forecast application;
- That CCA and IOU DAC-GT and CSGT programs be funded from GHG Revenue Funds and Public Purpose Program funds on a proportional basis if the total DAC-GT and CSGT program budgets exceed available GHG Revenue funds to ensure program funding certainty, equity, and administrative efficiency;⁶
- That evaluation of the CleanPowerSF DAC-GT and CSGT programs not occur prior to January 1, 2023 to provide time for start-up of the programs;
- That it will be responsible for forecasting and reporting the total bill discount for customers participating in the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs in its Annual Budget Advice Letters; and
- That as a long-term billing solution, the CPUC direct IOUs and CCAs to calculate and apply the 20% discount on their respective portions of the electric bill.

⁶ This proposal addresses one of the concerns raised by PG&E regarding how and which DAC-GT and CSGT programs should be funded if all GHG allowance revenue funds are exhausted, as provided in Pacific Gas and Electric Company's Response to East Bay Clean Energy Advice Letter 14-E, dated October 8, 2020.

Effective Date

Pursuant to General Order 96-B, General Rule 7.3.4 and Energy Industry Rule 5.3, this Tier 3 AL will become effective upon adoption by the CPUC of a resolution approving the AL.

Tier Designation:

This AL has a Tier 3 designation pursuant to Ordering Paragraph 17 of D.18-06-027.

Protests:

*****Due to the COVID-19 pandemic and shelter-at-home orders, CleanPowerSF is currently unable to receive protests or responses to this Advice Letter via U.S. Mail or fax. Please submit protests or responses to this Advice Letter to EDTariffUnit@cpuc.ca.gov and PowerRegulatory@sfwater.org.**

Anyone wishing to protest this Advice Letter Filing may do so by sending a letter via US Mail, facsimile, or electronically, any of which must be received no later than January 20, 2021, 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, 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 electronically to CleanPowerSF at the email address below on the same date it is submitted to the California Public Utilities Commission:

Kiara Hermann
Utility Analyst, CleanPowerSF
San Francisco Public Utilities Commission
525 Golden Gate Avenue, 7th Floor
San Francisco, CA 94102
Email: PowerRegulatory@sfwater.org

Notice

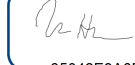
A copy of this AL is being served on the official CPUC Service List for Rulemaking 14-07-002.

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

Conclusion

San Francisco respectfully requests that the CPUC approve the implementation plan, tariffs, budgets, and ME&O plan proposed by San Francisco to establish and implement the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs pursuant to D.18-06-027.

DocuSigned by:



35042E0A6F0540B...

Michael A. Hyams
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San Francisco Public Utilities Commission
525 Golden Gate Ave., 7th Floor
San Francisco, CA 94102
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cc: Service List: R.14-07-002

APPENDIX A - AL 12E

CleanPowerSF Disadvantaged Communities Green Tariff and CleanPowerSF Community Solar Green Tariff Implementation Plan



Services of the San Francisco
Public Utilities Commission



**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 1 of 22**

Contents

I.	Introduction	2
II.	Eligibility and Enrollment	3
	a. CleanPowerSF Disadvantaged Communities Green Tariff (“CleanPowerSF DAC-GT”) Program	3
	i. Customer Eligibility	3
	ii. Customer Auto-Enrollment.....	4
	iii. Customer Enrollment Procedures	4
	b. CleanPowerSF Community Solar Green Tariff (“CleanPowerSF CSGT”) Program.....	6
	i. Customer Eligibility	6
	ii. Customer Enrollment	6
	c. Sponsor Eligibility	8
	i. Sponsor Enrollment	9
III.	Rate and Discount Design	9
	a. Customer Bill Discount	9
	b. Sponsor Bill Discount	10
IV.	Procurement.....	11
	a. CleanPowerSF DAC-GT Program	12
	b. CleanPowerSF CSGT Program.....	13
V.	Budget and Cost Recovery	15
	a. Budget.....	15
	i. Generation Cost Delta	16
	ii. Participant Bill Discount	16
	iii. Program Administration and ME&O Costs	17
	iv. Program Evaluation Costs.....	17
	b. Budget Forecasting and Reconciliation Procedures	18
	i. Budget Forecast	18
	ii. Report Actual Expenditures	18
	iii. Budget Reconciliation	18
	c. Cost Recovery Procedures.....	19
VI.	Marketing, Education, and Outreach	19
VII.	Reporting.....	20
VIII.	Program Measurement and Evaluation	21

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 2 of 22**

I. Introduction

In this plan, The City and County of San Francisco (“San Francisco”) describes its implementation of the California Public Utilities Commission (“CPUC”) Disadvantaged Communities (“DAC”) Green Tariff (“DAC-GT”) and Community Solar Green Tariff (“CSGT”), which allow eligible residents in DACs served by investor-owned electric utilities to subscribe to receive up to 100% of their electricity usage from solar facilities located in DACs as outlined in Decision (D.) 18-06-027. San Francisco’s CCA program, CleanPowerSF, is operated by the San Francisco Public Utilities Commission (“SFPUC”), an enterprise department of the City and County of San Francisco.

The CleanPowerSF DAC-GT and CleanPowerSF CSGT programs provide multiple options for customers in San Francisco DACs to gain access to clean energy resources. These two programs are part of a broader SFPUC initiative to develop renewable resources locally and operationalize equity across the organization, which includes innovative program offerings that help ensure equitable access to renewable energy. Both the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs help address barriers customers in disadvantaged communities face in the adoption of renewable energy, including economic, property ownership and structure, and marketing and outreach barriers.¹

The DAC-GT and CSGT programs adopted by the CPUC in D.18-06-027 provide a 20% total bill discount to eligible customers located in disadvantaged communities off their otherwise applicable rate. The CPUC has established that both programs will be funded first through greenhouse gas (“GHG”) allowance proceeds. If such funds are exhausted, public purpose program (“PPP”) funds will be used to cover any shortfalls.² The DAC-GT program will be available to residential customers who live in DACs and meet the income eligibility requirements for the California Alternate Rates for Energy (“CARE”) or Family Electric Rate Assistance (“FERA”) programs. The CSGT has a similar structure to the DAC-GT program, but is intended to drive more local, community-developed solar projects. The CSGT program requires community support and involvement with the solar project development, and the solar projects must be sited within five miles of participating communities.³ The CSGT program is open to all residential customers located in a DAC, with at least 50% of the program’s capacity reserved for CARE or FERA participating customers.⁴

Pursuant to D.18-06-027, Community Choice Aggregators (“CCAs”) may develop and implement their own DAC-GT and CSGT programs.⁵ Resolution E-4999 apportioned program capacity to CCAs based on the proportional share of residential customers in DACs served by investor-owned electric utilities that each CCA serves. San Francisco’s share is 1.49 MW for the DAC-GT program and 0.38 MW for the CSGT program.⁶ In Advice Letter 12-E, San Francisco requests the approval of the transfer of 0.336 MW of DAC-GT program capacity and 0.1725 MW

¹ See, e.g., D.18-06-027, pp.50-51 (describing effect of DAC-GT program).

² D.18-06-027, pp. 4.

³ D.18-06-027, pp. 64, 67.

⁴ D.18-06-027, p. 72.

⁵ D.18-06-027, p.4

⁶ Resolution E-4999 Table 1, p.14

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 3 of 22**

CSGT program capacity from CCAs that are not running their own programs. If the transfers are approved, the CleanPowerSF DAC-GT total program capacity would be 1.826 MW and the CleanPowerSF CSGT total program capacity would be 0.5525 MW.

This Implementation Plan includes the following details for San Francisco's proposed CleanPowerSF DAC-GT and CleanPowerSF CSGT programs:

- Customer eligibility and enrollment
- Rate and discount design
- Procurement
- Budget and cost recovery
- Marketing, education, and outreach
- Reporting
- Program measurement and evaluation

II. Eligibility and Enrollment

a. CleanPowerSF Disadvantaged Communities Green Tariff ("CleanPowerSF DAC-GT") Program

i. Customer Eligibility

The CleanPowerSF DAC-GT program will be available to residential customers who live in DACs served by the CleanPowerSF program, receive generation service from CleanPowerSF, and meet the eligibility requirements to participate in the California Alternate Rates for Energy ("CARE") or the Family Electric Rate Assistance ("FERA") program. As required by Resolution E-4999, customer enrollment is capped at a maximum of 2 MW solar equivalent per customer.

DACs are defined under D.18-06-027 as census tracts that are identified in the CalEnviroScreen 3.0 tool as among the top 25% of census tracts statewide, plus the census tracts in the top 5% of CalEnviroScreen's pollution burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.⁷ Pursuant to Resolution E-4999, in the event that the CalEnviroScreen tool is updated, new DACs are identified within its service area, and CleanPowerSF has unsubscribed program capacity available, CleanPowerSF will file a Tier 1 Advice Letter within 30 days of the release of the new version to update program eligibility rules. Customers who are already enrolled in the DAC-GT program will retain their eligibility even if their census tract is no longer determined to be within the top 25% of census tracts under the updated CalEnviroScreen tool.

Eligibility of customers is verified at the level of the Service Agreement ID ("SAID"). Service accounts enrolled under the following programs, services or rates are not eligible to participate in the CleanPowerSF DAC-GT program:

- Investor Owned Utility ("IOU") Bundled Service

⁷ D.18-06-027, pp. 16, 53.

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 4 of 22**

- Direct Access
- Standby Service
- Net Energy Metering (“NEM”) Rates
- Non-metered Service
- Rates that are not CARE- or FERA-eligible
- Non-residential Rates
- Master-metered customers
- Customers enrolled in the CleanPowerSF Community Solar Green Tariff rate schedule

ii. Customer Auto-Enrollment

San Francisco proposes to auto-enroll eligible customers participating in the Arrearage Management Program (“AMP”) with service addresses in a San Francisco DAC into the CleanPowerSF DAC-GT program and make the CleanPowerSF DAC-GT the default electricity supply option for eligible customers participating in the AMP. The AMP program incentivizes customers to remain current on their monthly bills by forgiving a portion of their arrears after each on-time monthly payment. One of the eligibility requirements for the AMP is CARE/FERA enrollment. Since both the DAC-GT and AMP were designed to serve CARE/FERA customers, auto-enrollment in the DAC-GT can complement the AMP by lowering the monthly bills that AMP customers must stay current on. By leveraging the 20% discount provided by the DAC-GT program to assist customers participating in the AMP, CleanPowerSF can help ensure that AMP customers remain eligible for debt forgiveness while on the AMP. The SFPUC Commission authorized CleanPowerSF to participate in the AMP on December 8, 2020⁸ and the CPUC approved implementation of the AMP on December 17th, 2020. On December 11, 2020 CleanPowerSF provided PG&E with notification of its intent to participate in the AMP. In the event that the AMP is not reauthorized after the first three years of the program and sunsets in the fourth year, CleanPowerSF proposes to auto-enroll customers in its DAC-GT program using eligibility criteria similar to those used in the AMP.

Upon completing auto-enrollment of eligible AMP customers, San Francisco intends to use any remaining program capacity to enroll eligible customers on an opt-in basis.

iii. Customer Enrollment Procedures

Enrollment of customers under Schedule DAC-GT occurs at the SAID level. Subscribing customers receive up to 100% solar energy based on their actual energy usage each month and will receive a 20% discount on their otherwise applicable tariff (“OAT”) for the enrolled SAIDs.

San Francisco will commence customer enrollment immediately upon the CleanPowerSF DAC-GT program launch, which is defined as once deliveries from the necessary program solar resource(s) have commenced. San Francisco may create a waitlist of interested customers before launch and will enroll eligible customers upon the commencement of deliveries of an interim resource⁹ or commercial operation date (“COD”) of the CleanPowerSF DAC-GT project,

⁸ Resolution No. 20-0242.

⁹ Resolution E-4999 finds it reasonable that existing projects that meet DAC-GT eligibility requirements may serve customers on an interim basis until the new DAC-GT projects come online so as to not delay customers’ ability to receive the benefits of the DAC-GT program. (p. 56, Findings and Conclusions No. 36.)

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 5 of 22**

whichever comes first. Customers will be enrolled in a first-come, first-served manner after customers eligible for auto-enrollment have been subscribed. San Francisco's proposed plan and process for auto-enrolling customers is described in more detail in the previous section (ii) above.

Participating customers will subscribe to a percentage of the CleanPowerSF DAC-GT project's output based on their previous 12-month average monthly usage.¹⁰ Once all capacity is subscribed to, San Francisco will create a waitlist of interested customers. Customers on the waitlist will be enrolled in sequential order. A participating customer can remain on the CleanPowerSF DAC-GT tariff for up to 20 years from the time of enrollment or until CleanPowerSF no longer has eligible resources under contract, whichever comes first.¹¹ There is no contract required when enrolling in the CleanPowerSF DAC-GT program. Customers may enroll for any number of months, and there is no enrollment or cancellation fee. Cancellation of a customer's participation will become effective on the next meter read date after a cancellation request is made, cancellations made within 5 business days of the next meter read date may not be changed for an additional billing cycle. Customers who become ineligible for CARE or FERA after enrollment into the CleanPowerSF DAC-GT program will be un-enrolled from the program, one billing cycle after CleanPowerSF notifies the customer of the change in eligibility.

Upon confirmation of eligibility and sufficient program capacity, the customer will be placed on the CleanPowerSF DAC-GT rate on the first day of the next billing cycle where the billing cycle start date occurs at least 5 business days after the date of the customer's determined eligibility for enrollment. A customer request that is received within 5 business days of the customer's next billing cycle may result in the customer being placed on the CleanPowerSF DAC-GT rate for the following billing cycle.

Customers interested in enrolling in the CleanPowerSF DAC-GT program will be able to sign up with the SFPUC online, by phone, or with a hardcopy application. The SFPUC will verify customer eligibility based on service account address (to verify DAC census tract) and CARE/FERA eligibility status. If a customer is not currently enrolled in the CARE or FERA program, they will be encouraged to enroll through the existing IOU enrollment process. SFPUC staff will support the customer as needed in the CARE/FERA application process with the utility. Once a customer's CARE/FERA eligibility has been established, the customer will be enrolled in the CleanPowerSF DAC-GT program.

If a customer moves within CleanPowerSF service territory, they will need to reestablish their eligibility for the program. If the customer is found to still be eligible, CleanPowerSF will add the customer to the program if capacity allows or add them to the end of the waitlist.

¹⁰ If previous 12-month historical usage is not available, the average monthly usage will be derived from as many months as available. For customers establishing new service, the class average monthly usage will be used.

¹¹ This expiration applies to the CPUC-funded DAC Solar programs only, San Francisco may continue offering comparable programs beyond the 20-year timeframe.

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 6 of 22**

b. CleanPowerSF Community Solar Green Tariff (“CleanPowerSF CSGT”) Program

i. Customer Eligibility

The CleanPowerSF CSGT program will be available to residential customers who live in DACs served by the CleanPowerSF program and receive generation service from CleanPowerSF.¹² Pursuant to D.18-06-027, a new solar generation project supporting the program must be developed and located within five miles of the participating customers’ census tract. At least 50% of a project’s capacity must be reserved by low-income customers, defined as those participating in either the CARE or FERA program. Non-residential customers are not eligible to participate, with the exception of the program sponsor, which is described in more detail below.

Eligibility of customers will be verified at the SAID level. As required by D.18-06-027, service accounts enrolled under the following programs, services or rates are not eligible to participate in the CleanPowerSF CSGT program:

- IOU Bundled Service
- Direct Access
- Net Energy Metering (“NEM”) rate
- Non-metered service
- Standby Service
- Schedule DAC-GT, Disadvantaged Communities Green Tariff

Master-metered customers may participate in the CleanPowerSF CSGT program so long as the master-metered account is eligible to be enrolled in CARE or FERA.

ii. Customer Enrollment

As with the CleanPowerSF DAC-GT, customer enrollment occurs at the SAID level. As required by D.18-06-027, customer enrollment is capped at a maximum of 2 MW solar equivalent per SAID.

CleanPowerSF may create a waitlist of interested customers before program launch and will enroll eligible customers upon the commencement of energy deliveries from the community solar project. The CleanPowerSF CSGT program allows eligible customers to subscribe to renewable electricity produced by a local community solar project for up to 100% of their electricity usage. Customers will subscribe to a percentage of their local community solar project’s output

¹² In the event that CalEnviroScreen is updated and DACs within San Francisco are changed, CleanPowerSF will file a Tier 1 AL within 30 days of the release of the new version to update program eligibility rules. As with the DAC-GT program, all residential customers in an eligible DAC at the time of a project’s initial energy delivery date will remain eligible to subscribe to that CSGT project, even if their DAC designation changes in subsequent iterations of CalEnviroScreen. “This grandfathered eligibility will apply to both existing subscribers and customers not previously subscribed to the project in that same DAC, to ensure that the project’s output can be fully subscribed by customers whose census tract is within 5 miles of the project.” (Resolution, E 4999, p. 38.)

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 7 of 22**

based on their previous 12-month average monthly usage.¹³ As described below, participating customers will receive a 20% discount on the otherwise applicable rate for eligible, enrolled SAIDs. Customers cannot be subscribed to more than one community solar facility at any time.

The following example describes the calculation of the customer's subscription allocation in more detail:

A residential customer has an average historical usage of 500 kWh per month, based on the previous 12 months of usage data. The customer subscribes to a 100 kW CleanPowerSF CSGT solar project with an estimated monthly output of 18,250 kWh.¹⁴ The customer's subscription allocation is then calculated as a percentage of the average monthly output of the solar system ($500 \text{ kWh} / 18,250 \text{ kWh} = 2.73\%$ of the project's capacity, or 2.73 kW of the 100 kW system). This percentage allocation is set at the time of the customer's subscription, and may be revisited annually to ensure accurate allocations of project capacity.

Eligible customers will be enrolled until 100% of the project's capacity is fully subscribed. Customers interested in enrolling in the CleanPowerSF CSGT program can sign up with the SFPUC online, by phone, or by submitting a paper application. The SFPUC will verify customer eligibility using service account address to verify its location in an eligible DAC census tract and within the 5-mile radius of the CleanPowerSF community solar project. CARE or FERA enrollment status will also be tracked to verify customer eligibility. San Francisco will encourage eligible customers to enroll in the CARE or FERA program if they are not already a participant. Enrollment attrition will be reviewed on a monthly basis, and new participants will be enrolled until all available capacity is fully subscribed.

Low-income customers will be enrolled on a first-come, first-served basis. Decision 18-06-027 requires that 50% of a project be subscribed to by low-income customers, defined as those who are CARE or FERA eligible, before other customers are enrolled in the CSGT program.¹⁵ Once 50% of project capacity is subscribed by low-income customers, non-low-income qualified residents in DACs will become eligible for enrollment. These residents can be recruited in the program before the 50% subscription requirement for low-income customers is met. However, they will be placed on a waitlist until low-income customers subscribe to 50% of the project's capacity.

CleanPowerSF will assess the subscription rate of low-income customers on a quarterly basis after the community solar project begins energy deliveries. If the low-income subscription rate drops below 50%, existing non-low-income customers will not be required to go back on the waitlist. However, new enrollments of non-low-income participants will be waitlisted until the 50% low-income threshold is met again. CleanPowerSF will inform the Energy Division Director in writing if the low-income enrollment rate drops below 35% of capacity.

¹³ If previous 12-month historical usage is not available, the average monthly usage will be derived from as many months as available. For customers establishing new service, the class average monthly usage will be used.

¹⁴ Based on a 25% capacity factor

¹⁵ D.18-06-027, pp. 80.

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 8 of 22**

Upon request and confirmation, the customer will be placed on the CleanPowerSF CSGT rate on the first day of the next billing cycle where the billing cycle start date occurs at least 5 business days after the date of determined eligibility for enrollment. A customer request that is received within 5 business days of the customer's next billing cycle may result in the customer being placed on the CleanPowerSF CSGT rate in the following billing cycle.

As with the CleanPowerSF DAC-GT program, customers will not be required to enter into a contract when enrolling in the CleanPowerSF CSGT program or commit to a minimum number of months of service in the program, and will not be subject to enrollment or cancellation fees. After a cancellation request is made, cancellation of a customer's subscription will become effective on the next meter read date. Cancellations made less than 5 business days of the next meter read date will be effective in the following billing cycle. A participating customer can remain on the CleanPowerSF CSGT tariff for the duration of the project's term, or up to 20 years, whichever comes first.¹⁶ Customer participation in the program automatically terminates if the Power Purchase Agreement ("PPA") between CleanPowerSF and the developer for the CleanPowerSF CSGT facility to which the customer is subscribed is terminated or the delivery term ends.

If a customer moves within CleanPowerSF's service territory, they will need to reestablish their eligibility for the program. If the customer is found to still be eligible, CleanPowerSF will add the customer to the program if capacity allows or add them to the end of the waitlist. CleanPowerSF will review the waitlist on a monthly basis and add customers as capacity allows.

c. Sponsor Eligibility

Under the CSGT program, community involvement must be demonstrated by a non-profit community-based organization ("CBO") or a local government entity "sponsoring" a community solar project on behalf of residents. The sponsor's role is to work with the project developer to encourage and facilitate the developer's engagement in the community. The sponsor will be responsible for providing a letter of commitment to developers on behalf of the community demonstrating sufficient interest in the project. Sponsors may also promote job training and workforce development efforts that result from the CSGT projects. Additional workforce development and job training requirements are described in the Procurement section below.

Sponsors may also be eligible for a 20% discount on a portion of their bill if they meet the following eligibility requirements:

- The sponsor must be a CleanPowerSF electric customer
- The sponsor must take service on the Community Solar Green Tariff¹⁷
- The sponsor must meet the geographic requirements for participating in the CSGT program (in a DAC and within 5 miles of the community solar project)¹⁸
- At least 50% of the project's capacity must be subscribed to by low-income customers

¹⁶ This expiration applies to the CPUC-funded DAC Solar programs only, San Francisco may continue offering comparable programs beyond the 20-year timeframe.

¹⁷ Sponsors are the only non-residential customers that are able to participate in the CSGT program

¹⁸ D.18-06-027, p.78

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 9 of 22**

- The sponsor must meet all other eligibility requirements of any participating customer as described in the CSGT customer eligibility section above

CBOs or local government entities that do not fulfill the eligibility requirements may still become project sponsors, however, they are not eligible to receive the 20% discount.

There may be more than one sponsoring entity supporting a single community solar project. Multiple sponsors may share the 20% discount as long as all sponsors meet the eligibility requirements outlined above.

A sponsor may also be, though it is not required, a site host.¹⁹

i. Sponsor Enrollment

Non-residential sponsors of a CleanPowerSF CSGT project are subject to the same enrollment rules and requirements as described above for residential customers participating in the program. For example, enrollment occurs at the SAID level and is capped at a maximum of 2 MW of solar equivalent per SAID, or 25% of the project's energy output, whichever is less.²⁰ The sponsor's subscription may not exceed its energy needs.

Using the same example as in the Customer Enrollment section above (100 kW with a 18,250 kWh monthly output), a sponsor's allocation is limited to 25% of its sponsored facility's output each month, or approximately 4,563 kWh of this example 100 kW project, even if the sponsor's monthly energy usage exceeds that amount. If two or more sponsors are designated for a specific CleanPowerSF CSGT project, the sponsors will need to inform CleanPowerSF in writing of how the discountable usage (4,563 kWh) is to be allocated between them.

III. Rate and Discount Design

This section outlines the CleanPowerSF rules and requirements for providing the 20 percent bill discount to participating customers.

a. Customer Bill Discount

Participants in both the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs will receive a 20% discount on the electric portion of the at their otherwise applicable rate ("OAR") applied.²¹ The discount applies as long as customers are enrolled in the program and they meet with all the eligibility and enrollment terms described in CleanPowerSF's DAC-GT or CSGT tariff sheets.

¹⁹ For the purposes of this program, the site host only refers to the site where the project is located. The community solar project must be located in front-of-the-meter, even if located at a customer site. Accordingly, all applicable rules to a front-of-the-meter project continue to apply.

²⁰ This limitation does not apply to a federal, state, or local government, school or school district, county office of education, the California Community Colleges, the California State University, or the University of California.

²¹ D.18-06-027, pp. 53,74

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 10 of 22**

For low-income customers enrolled in the CARE or FERA programs, and for customers who enroll in CARE or FERA in the process of enrolling in the CleanPowerSF DAC-GT or CleanPowerSF CSGT program, the OAR is the customer's existing CleanPowerSF generation rate and PG&E electric distribution rate. The 20% discount for these customers will be applied to their total electric bills after the CARE/FERA discount has been applied.

Residential customers that are already enrolled in SuperGreen, CleanPowerSF's 100% renewable offering, will be defaulted to Green, CleanPowerSF's base product for the purposes of calculating the 20% discount. The customers enrolled in the CleanPowerSF DAC-GT or CleanPowerSF CSGT program who are not enrolled in CARE or FERA will be receiving the 20% discount off CleanPowerSF's Green rate.

A customer's electricity bill consists of two main components: (1) the generation portion and (2) the delivery portion. CleanPowerSF, as a generation service provider, only has control over its customers' generation charges, and therefore, will only calculate the 20% discount for the generation portion of the electric bill for its participating customers. PG&E is responsible for the delivery portion of the electricity bill and will be responsible for calculating the 20% discount on that portion of the bill for CleanPowerSF's DAC-GT and CSGT program participants.

CleanPowerSF proposes the following monthly discount calculation and billing procedures for its DAC-GT and CSGT program participants:

1. PG&E sends CleanPowerSF customer usage information through its standard EDI process.
2. CleanPowerSF calculates the participating customers' generation charges, including the 20% discount.
3. PG&E applies the CARE/FERA discount, if applicable, and then calculates the 20% discount off its delivery charges.
4. CleanPowerSF sends PG&E its generation charges (reduced by 20% bill discount) for inclusion on the bill through its standard EDI process.
5. PG&E compiles the bill and sends it to the customer.
6. Once the customer pays its bill to PG&E, PG&E remits the payment received for generation charges to CleanPowerSF per established processes.
7. CleanPowerSF recovers the revenue shortfall associated with the discount it provides on the generation portion of the bill through the CPUC's adopted DAC-GT and CSGT cost recovery mechanisms (see details below).
8. PG&E recovers the revenue shortfall associated with the discount it provides on the delivery portion of the bill through the CPUC's adopted DAC-GT and CSGT cost recovery mechanisms.

Regarding bill presentment, the 20% discount on the generation portion of the bill will be shown on the CleanPowerSF portion of the bill, while the 20% discount on the delivery portion of the bill will be shown on the PG&E portion of the bill.

b. Sponsor Bill Discount

CleanPowerSF CSGT project sponsors who meet all the eligibility requirements described in Section II.c above will receive a 20% discount on eligible enrolled SAIDs. The sponsor bill

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 11 of 22**

discount will be calculated based on the same methodology described for the residential program participants. The project sponsor's bill discount is capped at 25% of the project's energy output and cannot exceed the sponsor's usage under the applicable SAIDs. The discount applies as long as sponsors are enrolled under the program and they comply with all sponsor eligibility and enrollment terms described above. If two or more sponsors are designated, the sponsors must inform CleanPowerSF in writing of how the 'discountable usage,' which is capped at 25% of the project's energy output, is to be allocated between them. CleanPowerSF will then calculate the applicable discount to each sponsor accordingly.

The sponsor discount will be available to sponsors only after the community solar project has reached its minimum 50% low-income customer subscription rate. If the subscription rate of low-income customers drops below 50% of the project's capacity at any point, the sponsor bill credit will not be revoked.

IV. Procurement

Per Resolution E-4999, CleanPowerSF has been allocated 1.49 MW for its DAC-GT program and 0.38 MW for its CSGT program based on the proportional share of residential customers in DACs that CleanPowerSF serves.²²

Resolution E-4999 also allows CCAs that serve customers in the same IOU service territory to share, allocate and/or trade program capacity provided each party affirms the designation in writing through comments on the Implementation Advice Letters of the affected CCAs.²³ The following table summarizes the capacity other CCAs have agreed to allocate to CleanPowerSF, pending CPUC approval of this Advice Letter. A letter confirming the capacity transfers signed by each of the CCAs is included as Appendix F.

Transferring CCA	DAC-GT Capacity Transferred	CSGT Capacity Transferred
Silicon Valley Clean Energy	0.1 MW	0.0225 MW
San José Clean Energy	-	0.09 MW
Central Coast Community Energy	0.136 MW	0.045 MW
Sonoma Clean Power	0.1 MW	0.0150 MW
Total	0.336 MW	0.1725 MW

CleanPowerSF's total program capacities, adjusted for the capacity that would be transferred from other CCAs, would be as follows:

- DAC-GT: 1.826 MW
- CSGT: 0.5525 MW

CCAs who serve customers in the same IOU service territory may elect to pool capacity allocations to offer shared RFO projects to serve their DAC customers provided that projects meet

²² Resolution E-4999, p. 14 (Table 1.)

²³ Resolution E-4999 pp.16, 54 (Findings and Conclusions No. 17.)

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 12 of 22**

all eligibility requirements for the DAC-GT and CSGT programs.²⁴ CleanPowerSF may exercise this option with other CCAs in PG&E's service territory. CleanPowerSF will coordinate with other interested CCAs, and if an agreement to pool resources is reached, CleanPowerSF will notify the CPUC when it submits its solicitation materials to the CPUC for review after issuance of the resolution approving CleanPowerSF's tariffs to implement the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs.

All renewable energy resources procured on behalf of customers participating in the DAC-GT and CSGT programs, as well as any interim resources, will comply with the California Air Resources Board ("CARB") Voluntary Renewable Electricity Program. California-eligible GHG allowances associated with these purchases will be retired by CleanPowerSF on behalf of participating customers as part of CARB's Voluntary Renewable Electricity Program.

Per D.18-06-027, Green-e® certification is required for DAC-GT and CSGT programs. To ensure compliance with Green-e® program rules and prevent oversubscription of the CleanPowerSF Green Tariff project, CleanPowerSF intends to adopt customer enrollment rules similar to the CleanPowerSF CSGT program and allocate a percentage of the project output to cover each customer's monthly usage. San Francisco F proposes customer usage in excess of their subscription be met with supply from CleanPowerSF's default Green product, which is at least 50% renewable.

a. CleanPowerSF DAC-GT Program

Projects used to supply the DAC-GT program must be located in a DAC area within the IOU service territory where the participating customers receive distribution service (for CleanPowerSF's proposed programs that would be within PG&E's service territory). In the future, if a census tract that was designated a DAC changes due to updates to the CalEnviroScreen tool, CleanPowerSF DAC-GT projects already contracted for or developed in these census tracts will continue to be eligible to serve customers participating in the CleanPowerSF DAC-GT program.

CleanPowerSF was allocated 1.49 MW of capacity in Resolution E-4999 for the DAC-GT program. CleanPowerSF is receiving 0.336 MW of DAC-GT capacity transferred from other CCAs, bringing its total program capacity to 1.826 MW. Eligible projects must be sized between 500 kW and 20 MW (or 1.826 MW in CleanPowerSF's program due to its total program capacity, unless the CleanPowerSF pools capacity for the CleanPowerSF DAC-GT program with other entities in PG&E's service territory). Consistent with the CPUC's DAC-GT program requirements,²⁵ CleanPowerSF will consider both full capacity deliverability and energy-only projects (i.e., no capacity deliverability) in its solicitations.

CleanPowerSF will issue DAC-GT solicitations once a year, as needed until its DAC-GT program capacity cap is reached. As directed by D.18-06-027, the solicitation process will follow these guiding principles:

- The project is selected through a competitive solicitation;

²⁴ Resolution E-4999, p. 16

²⁵ Resolution E-4999, p.66

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 13 of 22**

- CleanPowerSF will execute a Power Purchase Agreement (“PPA”) with a developer for the solar project; and
- There is no direct contractual relationship between the customer and project developer for energy generation from the DAC-GT project.

Eligibility for procurement under the DAC-GT program requires that a project’s prices must be at or below the statewide CCA cost cap provided confidentially by the CPUC’s Energy Division Staff on September 5, 2019.²⁶

CleanPowerSF proposes that it may also issue a solicitation, on its own or jointly with other CCAs, for an interim resource to serve the CleanPowerSF DAC-GT program while CleanPowerSF solicits a new project to serve the program or while such a project is under development. This resource shall meet all other eligibility requirements that apply to DAC-GT resources and will allow CleanPowerSF to accelerate the launch of the program.

b. CleanPowerSF CSGT Program

Projects used to supply the CSGT program must be sited in a DAC area within the same IOU service territory where the participating customers receive distribution service (for CleanPowerSF’s proposed programs that would be within PG&E’s service territory) and they must also be located within 5 miles of the benefitting customers’ DAC census tract. In the future, if a census tract that was designated a DAC changes due to updates to the CalEnviroScreen tool, CleanPowerSF CSGT projects located in these census tracts that were previously considered a DAC under the program, will continue to be eligible to serve customers participating in the CleanPowerSF CSGT program.

CleanPowerSF was assigned 0.38 MW in Resolution E-4999 for the CSGT program.²⁷ CleanPowerSF is requesting approval to receive 0.1725 MW of CSGT capacity from other CCAs, which would bring its total CSGT program capacity to 0.5525 MW.

Eligible projects have no minimum size requirements and a maximum size of 3 MW (or 0.5525 MW for CleanPowerSF’s program due to the size of its allocation). CleanPowerSF will consider both full capacity deliverability and energy-only projects in its solicitations, consistent with the CPUC’s CSGT program requirements.²⁸

CleanPowerSF will issue CSGT solicitations once a year, as needed, until the program cap is reached. Depending on timing, CleanPowerSF CSGT solicitations may be run in conjunction with the CleanPowerSF DAC-GT program’s solicitations. However, the CleanPowerSF DAC-GT and CleanPowerSF CSGT program will each have separate capacity

²⁶ Energy Division staff explained in a September 5, 2019 email that CCAs are expected to compare the unadjusted CSGT project bids to the price cap. CCAs should use the price cap to screen the submitted bid prices before making adjustments to those prices such as time of delivery adjustments. Energy Division staff also clarified in a workshop that the value of the CCA cost cap will change when all three IOUs procure new resources under the Green Tariff Shared Renewables Program (“GTSR”) program or under the Renewable Auction Mechanism (“RAM”) as-available peaking category. Energy Division will notify the CCAs when this occurs and changes will apply on a prospective basis to future contracts.

²⁷ Resolution E-4999, p. 14 (Table 1).

²⁸ Resolution E-4999, p. 66

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 14 of 22**

allocations and bid requirements under the same solicitation if they were to be run in conjunction. The solicitation process for the CleanPowerSF CSGT program will follow the same guiding principles established above for the CleanPowerSF DAC-GT program:

- The project is selected through a competitive solicitation;
- CleanPowerSF will execute a Power Purchase Agreement (“PPA”) with a developer for the solar project; and
- There is no direct contractual relationship between the customer and project developer for energy generation from the CSGT project.

Eligibility for procurement under the DAC-GT program requires that a project’s prices must be at or below the statewide CCA cost cap provided confidentially by the CPUC’s Energy Division Staff on September 5, 2019.²⁹

Community sponsorship of the project by a CBO or local government agency is required to be eligible to submit a bid for the CleanPowerSF CSGT program. Developers will be required to obtain and provide a letter of commitment from sponsors as part of the solicitation process. A letter of commitment from a sponsor must include:

- Demonstration of substantial interest of community members in subscribing to the project;
- Estimated number of subscribers, with justification to ensure project is sized to likely demand;
- A preliminary plan to conduct outreach and recruit subscribers (which may be conducted in conjunction with the developer and/or utility); and
- Siting preferences, including community suggested host sites and verification that the site chosen for the bid is consistent with community preferences.

Twenty-five percent of each CSGT’s project capacity must be subscribed to by eligible low-income residents prior to issuing the project’s permission to operate . If this requirement is not met, the project will not be able to begin delivery under the contract.³⁰

In addition, D.18-06-07 established the following metrics for the prioritization of CSGT project bids:

- CleanPowerSF will prioritize projects that meet all eligibility requirements located in the top 5% census tracts of disadvantaged communities per the latest version of CalEnviroScreen;
- CleanPowerSF will prioritize projects that leverage other government funding such as a state Community Services Department grant, or that provide evidence of support or

²⁹ Energy Division staff explained in a September 5, 2019 email that CCAs are expected to compare the unadjusted CSGT project bids to the price cap. CCAs should use the price cap to screen the submitted bid prices before making adjustments to those prices such as time of delivery adjustments. Energy Division staff also clarified in a workshop that the value of the CCA cost cap will change when all three IOUs procure new resources under the Green Tariff Shared Renewables Program (“GTSR”) program or under the Renewable Auction Mechanism (“RAM”) as-available peaking category. Energy Division will notify the CCAs when this occurs and changes will apply on a prospective basis to future contracts.

³⁰ No interconnection or other project development processes will be influenced. The project can be finalized but payment on the delivery will not be initiated until the 25% low-income customer threshold is met.

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 15 of 22**

endorsements from programs such as Transformative Climate Communities or other local climate initiatives;³¹ and

- CleanPowerSF will prioritize job training and workforce development factors and will require workforce development for all projects, including local and targeted hiring to enable the creation of job opportunities for low-income communities in its service territory.³²
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V. Budget and Cost Recovery

This section describes the rules and requirements regarding program costs and budget, funding and cost recovery mechanisms, and the process of reviewing program costs.

a. Budget

Program administrators must submit annual program budget estimates via a Tier 1 Advice Letter by February 1st of each year for the following program year.³³ Each Advice Letter must include separate program budget estimates for the DAC-GT and CSGT programs and must clearly identify any costs that are shared between the programs.

Annual budget submissions will include, at a minimum, the following budget items:

- Generation cost delta for DAC-GT, if any;³⁴
- 20% bill discount for DAC-GT participating customers;
- Generation cost delta for CSGT, if any;
- 20% bill discount for CSGT participating customers;
- Program administration costs;
- Marketing, education, and outreach (“ME&O”) funding; and
- Program evaluation costs.

Program costs will not be charged to participating customers and will not appear on customers’ bills. Instead, the cost categories described above will be booked and charged as program costs to the respective program. If costs are shared between programs, the proportional amount relative to San Francisco’s total allocation will be booked and charged to each program separately.

³¹ D.18-06-027 at p.82

³² See D.18-06-27, p. 87.

³³ Resolution, E-4999 at p.26

³⁴ 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.”

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 16 of 22**

i. Generation Cost Delta

For subscribed energy, the generation cost delta is the net value of renewable resource costs and other generation-related costs used to support the program that are more or less than the otherwise applicable class average generation cost. The generation cost will include the incremental energy costs, a weighted average of the generation costs of the customer rate's renewable and non-renewable content, incremental shaping costs and incremental costs for Resource Adequacy ("RA") products. The cost components are defined as follows:

- The energy generation cost for the DAC-GT program will be the weighted average of the energy contract prices for all solar projects under the program;
- The energy generation cost for the CSGT program will be the weighted average of the specific solar project that the customer subscribes to;
- The incremental RA value or cost of the DAC-GT and CSGT resources is the delta between the RA value of the solar resources and the cost of procuring RA on behalf of the program subscription capacity. It is determined by multiplying the CAISO Net Qualifying Capacity by the 2021 RA value benchmark, compared against RA costs as determined by CleanPowerSF's residential load profile multiplied by the 2021 RA benchmark;
- The incremental shaping value or cost of DAC-GT and CSGT resources as determined by the applicable resources' production profile compared against CleanPowerSF's residential load profile multiplied by the CAISO Day Ahead Locational Marginal Price ("LMP") for the PG&E Default Load Aggregation Point ("DLAP").

The delta between the rate's generation cost and the generation cost of the DAC-GT or CSGT resource will then be multiplied by the volume served each month by each program to arrive at the total above market procurement cost or below market procurement savings from the program.

The above market generation costs will not be charged to participating customers and thus will not appear on the customers' bills. Instead, the cost delta will be tracked by CleanPowerSF, and will be charged as a program cost and recovered through GHG allowance revenues and Public Purpose Program funds as outlined below.

Because new DAC-GT facilities will be contracted by CleanPowerSF to provide all their output, any potential above market costs associated with unsubscribed output will also be covered by program funds.³⁵ CleanPowerSF proposes to credit excess energy not used by program participants to the following program year's budget at the value of the CleanPowerSF DAC program solar energy used in the calculation of the generation cost delta. If applicable, this credit will be identified in CleanPowerSF's annual Budget Advice Letter.

ii. Participant Bill Discount

As described above, program participants will receive a 20% discount on the otherwise applicable rate of eligible SAIDs. CleanPowerSF's annual program budget will include the estimated total cost of the 20% discount it provides to participating customers on the generation portion of the bill. This calculation will be based on forecasted monthly enrollment in each program and average monthly bills by customer class. Actual expenditures of the prior program year will

³⁵ D.18-06-027 at p.83

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 17 of 22**

be reported in the following program year as part of a reconciliation process (i.e. 2021 actual expenditures to be reported in 2022)

iii. Program Administration and ME&O Costs

Resolution E-4999 establishes a budget cap of 10% of the total budget for program administration costs and a budget cap of 4% of the total budget for ME&O costs. However, administrative and ME&O costs may be higher than these budget allocations in the first two years during program development and implementation, because program start-up costs will be higher.³⁶ Beyond the first two program years, San Francisco will submit a Tier 3 Advice Letter if the need to exceed the budget category caps arises.³⁷ San Francisco will track program costs for the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs separately.

Per Resolution E-4999, Administrative budgets must be broken out into:

- Program Management;
- Information technology (“IT”);
- Billing operations;
- Regulatory compliance; and
- Procurement.

Marketing, education, and outreach costs must be broken out into:

- Labor costs;
- Outreach and material costs; and
- Local CBO/sponsor costs (CSGT only).

iv. Program Evaluation Costs

The DAC-GT and CSGT programs must be reviewed by an independent evaluator every three years. The IOUs will be responsible for selecting an independent evaluator in 2021 for CPUC jurisdictional programs.³⁸ As CCA programs will launch after the IOUs’ programs, CleanPowerSF proposes that the first evaluation of its program not occur before January 1, 2023.

In addition to budget forecasts, annual program budget submissions must also include details on program capacity and customer enrollment numbers for both programs:

- Existing capacity at previous program year close;
- Forecasted capacity for procurement in the upcoming program year;
- Customers served at previous program year’s close; and
- Forecasted customer enrollment for the upcoming program year.

Finally, CleanPowerSF will submit Confidential Appendix E containing the following workpapers:

- Workpaper for the calculation of the total generation cost delta; and

³⁶ Resolution E-4999, pp. 29-30

³⁷ 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 principle should also apply to the CCAs.

³⁸ D.18-06-027, 105 (Ordering Paragraph No. 18).

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 18 of 22**

- Workpaper for the calculation of the 20% bill discount to participating customers.

CleanPowerSF submits its budget estimate for PYs 2021 and 2022 in Appendix C to the Implementation Advice Letter.

b. Budget Forecasting and Reconciliation Procedures

CleanPowerSF will file a Tier 1 Budget Advice Letter by February 1 of each year.³⁹ In its Annual Budget Advice Letter filings, CleanPowerSF will do the following for each program separately:

- Request approval of its forecasted budget for the upcoming program year (e.g. by February 1, 2022 for the 2023 Program Year);
- Report its actual expenditures during the prior program year (e.g. by February 1, 2022 for the 2021 Program Year); and
- Reconcile the prior year's budget forecast with actual expenditures.

i. Budget Forecast

CleanPowerSF will forecast estimated program costs for the upcoming program year for all budget categories described above. For the projected cost of providing the 20% discount to customers, CleanPowerSF will estimate the total expected cost for the generation and delivery portion of the electric bill and will include both in its program budget.

ii. Report Actual Expenditures

CleanPowerSF will report on actual expenditures for the previous program year for all budget categories described above. For the actual cost of providing the 20% discount to customers, CleanPowerSF will report on the actual total cost of the generation portion of the electric bill and will coordinate with PG&E on reporting the actual total cost of the delivery portion of the electric bill. The Annual Budget Advice Letter will be the mechanism for the Commission and stakeholders to review CleanPowerSF's actual CleanPowerSF DAC-GT and CleanPowerSF CSGT program costs and performance. Based on the information provided in CleanPowerSF's Annual Budget Advice Letter, PG&E can include a summary of actual program expenditures for the previous program year in its ERRA forecast application.

iii. Budget Reconciliation

In its Annual Budget Advice Letter, CleanPowerSF will true up forecasted program costs against actual expenditures by budget category for the prior program year. Any unspent funds from the prior program year will be used to offset the forecasted budget for the upcoming program year. If actual expenditures exceed the forecast in the previous program year, CleanPowerSF will add the shortfall to the forecasted budget for the upcoming program year.

³⁹ The estimated budgets for PY 2021 and 2022 are included as an attachment to this filing, hence no additional Tier 1 Advice Letter will be required by February 2021 for the 2022 program year.

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 19 of 22**

c. Cost Recovery Procedures

As noted above, pursuant to D.18-06-027, the DAC-GT and CSGT programs are funded first through available GHG allowance revenues. If such funds are exhausted, the programs will be funded through the Public Purpose Program (“PPP”). If forecasted annual program costs for all Program Administrators in an IOU service territory are greater than the GHG allowance revenues available for the programs, all available GHG allowance revenues will be set aside for the programs and the shortfall will be covered by PPP funds.

D.18-06-027 authorizes CCAs to access GHG allowance revenues and/or PPP funds to administer their DAC-GT and CSGT programs.⁴⁰ The IOUs collect the GHG allowance revenues and PPP funds, and have established balancing accounts for the DAC-GT and CSGT programs. San Francisco requests that the Commission direct PG&E to modify its DAC-GT and CSGT balancing accounts to include a sub-account for the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs. CleanPowerSF proposes that IOU and CCA programs be funded from both GHG allowance revenues and PPP funds in a proportional manner.

Once the CPUC approves CleanPowerSF Advice Letter 12-E and subsequent Annual Budget Advice Letters, San Francisco F requests that it direct PG&E to include the total budget estimate for the upcoming program year for the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs in the current ERRA forecast application. When the CPUC issues a decision in the ERRA Forecast application, it should direct PG&E to set aside the requested CleanPowerSF budget in a subaccount of PG&E’s DAC-GT and CSGT balancing accounts. CleanPowerSF also requests the CPUC to direct PG&E to transfer program funds to CleanPowerSF on a forward annual basis.⁴¹

If the CleanPowerSF budget portion of the ERRA Forecast application is not approved by January 1 of a given program year, CleanPowerSF requests the CPUC to direct PG&E to transfer all past due funds to CleanPowerSF within thirty days of issuance of such approval.

VI. Marketing, Education, and Outreach

CleanPowerSF has established a Marketing, Education, and Outreach (“ME&O”) plan to promote the program and encourage customer participation in the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs.

CleanPowerSF submits an ME&O plan for PYs 2021 and 2022 as Appendix D to its Advice Letter.⁴² The ME&O plan discusses specific methods for customer outreach, including any coordination with CBOs and community sponsors for each of the programs separately. The plan addresses how CleanPowerSF will work to identify residential customers in DACs who are likely

⁴⁰ See D.18-06-027, p.104 (Ordering Paragraph No. 17).

⁴¹ In 2021, PG&E should be directed to include both the PY 2021 and PY 2022 budget estimates in its 2022 ERRA Forecast. Once the 2022 ERRA Forecast is approved, PG&E should be directed to transfer all past due 2021 funds within thirty days of issuance of such approval.

⁴² The ME&O plan and budget for PY 2021 are subject to change depending on the Implementation Advice Letter approval date.

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 20 of 22**

to be eligible for the CARE and FERA programs but who are not yet enrolled. Finally, the plan discusses how to leverage customer engagement for the CleanPowerSF DAC-GT and CleanPowerSF CSGT to market other programs that may benefit the same subset of customers.

CleanPowerSF will file annual ME&O plans and detailed budgets by February 1 of each year for the upcoming program year, starting in 2022 as the 2022 ME&O plan is included as an Appendix to this Implementation Advice Letter.

VII. Reporting

Within 30 calendar days after the end of each calendar quarter, CleanPowerSF will file a quarterly report that describes separately for each program the capacity procured, the capacity online, and customer subscription. These quarterly reports will detail:

- Capacity procured
- Capacity online
- DACs in which projects are located
- Number of participating customers in each DAC in CleanPowerSF's service territory
- Number of customers who have successfully enrolled in CARE and FERA in the process of signing up for the CleanPowerSF DAC-GT or CleanPowerSF CSGT programs

The quarterly report will be submitted to the CPUC and served onto the service list of R.14-07-002.

Semi-annually, within 30 calendar days after the end of each six-month period in a year, CleanPowerSF will report the following information for CleanPowerSF CSGT projects to the CPUC:

- Number of customers subscribed to each project and total capacity subscribed to;
- Whether a waitlist of non-CARE or non-FERA customers exists and if it does, the length;
- If project sponsors are receiving a bill discount and the size of each sponsor's subscription; and
- The number of master-metered properties served on the CSGT tariff and the total capacity those properties receive.

San Francisco's first quarterly and semi-annual report will be filed on the first scheduled reporting due dates after CleanPowerSF customer enrollment begins. The table below summarizes San Francisco's reporting obligations to the CPUC under the CPUC DAC-GT and CSGT programs.

Filing	Filing Dates	Data Reported (By Program)
Quarterly Progress Report	Every: <ul style="list-style-type: none"> • January 30th • April 30th • July 30th • October 30th 	<ul style="list-style-type: none"> • Capacity Procured • Capacity Online • Customers Subscribed • Identify DACs procured capacity is in • List number of participating customers in each DAC

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 21 of 22**

		<ul style="list-style-type: none"> Number of customers who have successfully enrolled in CARE/FERA in the process of signing up for the DAC programs
Semi-Annual Progress Report	Every: <ul style="list-style-type: none"> January 30th July 30th 	<ul style="list-style-type: none"> Number of income-qualified customers subscribed to each CSGT project and capacity they are receiving Whether a waitlist of non-income qualified customers exists and size of the list If project sponsors are receiving bill credits and each sponsor's subscription Number of master-metered properties served on CSGT tariffs and capacity those properties are subscribed to receive
Annual Tier 1 Advice Letter Filing	Every February 1 st	<ul style="list-style-type: none"> Forthcoming Program Year Budget Current Program Year Actual Budget Expenses and True-Up Forthcoming Program Year Marketing, Education and Outreach Plan and Budget

VIII. Program Measurement and Evaluation

Pursuant to Resolution E-5102, an independent evaluator will review the DAC-GT and CSGT programs every three years beginning in 2021.⁴³ The CSGT program must also be assessed by the same independent evaluator one year after program launch.⁴⁴ CleanPowerSF proposes the CPUC commence independent evaluation for the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs at the beginning of the upcoming year after customers have been enrolled under the program for a minimum of one full year (e.g. if the CleanPowerSF CSGT program is launched in the Fall of 2021, the first program evaluation would occur in January of 2023).

⁴³ The CPUC's Energy Division will select the independent evaluator through a Request for Proposals ("RFP") process managed by San Diego Gas & Electric Company on behalf of the CPUC. The RFP process will be led by Energy Division staff and Energy Division staff will make the final decision on the winning bid. (See D.18-06-27 [Independent Evaluator picked pursuant to similar process for picking Program Administrator].)

⁴⁴ Resolution E-4999 clarified that it is appropriate to interpret the first year of the CSGT program as the first year customers are able to subscribe to projects.

**CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Implementation Plan
Page 22 of 22**

As one independent evaluator will evaluate all IOU and CCA programs per Resolution E-5102⁴⁵, San Francisco requests that the CPUC direct PG&E to include funding in its program budget for the independent evaluator that also covers the CleanPowerSF programs.

⁴⁵ Resolution E-5102, pp. 7-8.

APPENDIX B – AL 12E

Electric Schedule DAC-GT, CleanPowerSF Disadvantaged Communities Green
Tariff Program and CSGT, CleanPowerSF Community Solar Green Tariff
Program



ELECTRIC SCHEDULE DAC-GT

CleanPowerSF DISADVANTAGED COMMUNITIES GREEN TARIFF PROGRAM

I. Applicability

The CleanPowerSF Disadvantaged Communities Green Tariff (“DAC-GT”) is a voluntary rate supplement to the customer’s otherwise applicable rate schedule (“OAS”) under which eligible customers have their electricity usage met with up to 100% solar energy based on their annual usage while also receiving a 20% discount on their OAS.

To enroll under the rate, a customer must meet the following eligibility requirements:

- Customer must receive electric generation service from CleanPowerSF;
- Customer must be on a residential rate;
- Customer must meet the income eligibility requirements for the California Alternate Rates for Energy (“CARE”) or Family Electric Rate Assistance (“FERA”) programs;
- Customer’s service address must be located in a disadvantaged community (“DAC”) served by CleanPowerSF. DACs are defined as communities that are identified in the CalEnviroScreen 3.0 tool as among the top 25% of census tracts statewide, plus the census tracts in the highest 5% of CalEnviroScreen’s Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data. In the event that the CalEnviroScreen tool is updated, enrolled customers will retain their eligibility even if their census tract no longer qualifies as an eligible DAC.

Service accounts enrolled under the following programs, services or rates are ineligible to enroll in the CleanPowerSF’s DAC-GT rate:

- IOU bundled service;
- Direct access;
- Standby service;
- Net energy metering (“NEM”) rates;
- Non-metered service;
- Rates that are not CARE- or FERA-eligible;
- Non-residential rates;
- Master-metered customers; and
- Customers enrolled in CleanPowerSF’s Community Solar Green Tariff (“CSGT”) rate schedule.

Eligibility of customers is verified at the level of the Service Agreement ID (“SAID”).

II. Enrollment Terms

Enrollment of customers under Schedule CleanPowerSF DAC-GT occurs at the level of the SAID. Customer enrollment is capped at a maximum of 2 MW solar equivalent per SAID. This limitation does not apply to a federal, state, or local government, school or school district, county office of education, the California Community Colleges, the California State University, or the University of California.

Customers subscribe to a percentage of their community solar project's capacity based on their previous 12-month average monthly usage. This percentage allocation is set at the time of customer subscription but may be revisited periodically to ensure accurate allocations of project energy produced.

San Francisco intends to auto-enroll eligible customers participating in the Arrearage Management Program ("AMP") into the CleanPowerSF DAC-GT program. Upon completing auto-enrollment of eligible AMP customers, San Francisco intends to use any remaining program capacity to enroll eligible customers on a voluntary, or opt-in basis.

Upon confirmation of eligibility, the customer will be placed on the DAC-GT rate on the first day of the next billing cycle where the start date occurs at least 5 business days after the date that San Francisco determines the customer's eligibility for enrollment. A customer request for service under the CleanPowerSF DAC-GT that is received less than 5 business days before the customer's next billing cycle may result in the customer being placed on the CleanPowerSF DAC-GT rate on the following billing cycle.

A participating customer may remain on the CleanPowerSF DAC-GT tariff for up to 20 years from the time of enrollment or until San Francisco no longer has eligible resources under contract, whichever comes first¹. There is no contract required when enrolling in the CleanPowerSF DAC-GT program. There is no minimum enrollment commitment required and there is no cancellation fee. After a cancellation request is made, cancellation of a customer's participation will become effective on the next meter read date; cancellations made within five (5) business days of the next meter read date may not be changed until the following billing cycle.

If a customer moves its service address to another location within CleanPowerSF's service territory, they will need to reestablish their eligibility for the program. If the customer is found to still be eligible, San Francisco will add the customer to the program if capacity allows or add them to the end of the waitlist. San Francisco will review the waitlist on a monthly basis and add customers as capacity allows. Customers who, after enrollment into the CleanPowerSF DAC-GT program, become ineligible for CARE or FERA will be removed from the CleanPowerSF DAC-GT program.

¹ This expiration applies to the CPUC-funded DAC Solar programs only, San Francisco may continue offering comparable programs beyond the 20-year timeframe.

III. Rates

Customers taking service on this rate schedule will receive a 20% discount on the electric portion of their bill compared to their otherwise applicable rate schedule or OAS. The OAS is the customer's existing rate. For example, if the customer is currently enrolled in either the CARE or FERA discount programs, the 20% discount will be applied to bills after the normal CARE/FERA discount has been applied. The 20% discount applies as long customers are enrolled under the CleanPowerSF DAC-GT program and continue to meet all of the eligibility and enrollment terms.

Residential customer SAIDs that are enrolled in CleanPowerSF's other 100% renewable energy generation service option (i.e. CleanPowerSF's "SuperGreen" product) when enrolling under the CleanPowerSF DAC-GT program will be switched to CleanPowerSF's base product (i.e. CleanPowerSF's "Green" product) for the purposes of calculating the 20% discount.

IV. Billing

Monthly bills are calculated in accordance with the customer's OAS and the provisions contained herein. The amount credited under Schedule CleanPowerSF DAC-GT is provided by both PG&E and CleanPowerSF: San Francisco calculates the 20% discount for the generation portion of the electric bill and PG&E calculates the 20% discount for the delivery portion of the electric bill.

Both entities display the discount on their respective portion of the customer's utility bill.

V. Metering

All customers must be metered according to the requirement of their OAS.

ELECTRIC SCHEDULE CSGT

CleanPowerSF COMMUNITY SOLAR GREEN TARIFF PROGRAM

I. Applicability

The CleanPowerSF Community Solar Green Tariff (“CSGT”) is a voluntary rate supplement to the customer’s otherwise applicable rate schedule (“OAS”) under which eligible customers have their electricity usage met with up to 100% solar energy based on their annual usage while also receiving a 20% discount on their OAS.

a. Residential Customer Eligibility

To enroll under the rate, a customer must meet the following eligibility requirements:

- Customer must receive electric generation service from CleanPowerSF;
- Customer must be on a residential rate, except for the project sponsor;
- Customer must meet the income eligibility requirements for the California Alternate Rates for Energy (“CARE”) or Family Electric Rate Assistance (“FERA”) programs, or customer must wait to enroll until at least fifty percent of the project’s capacity is utilized by low-income customers;
- Customer’s service address must be located in a disadvantaged community (“DAC”) served by CleanPowerSF. DACs are defined as communities that are identified in the CalEnviroScreen 3.0 tool as among the top 25% of census tracts statewide, plus the census tracts in the highest 5% of CalEnviroScreen’s Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data. In the event that the CalEnviroScreen tool is updated, enrolled customers will retain their eligibility even if their census tract no longer qualifies as a DAC. This grandfathered eligibility will apply to both existing subscribers and customers not previously subscribed to the project in the same DAC, to ensure that the project’s output can be fully subscribed by customers whose census tract is within 5-miles of the project;
- The solar generation project to which a customer subscribes must be located within five miles of the participating customer’s census tract.

Service accounts enrolled under the following programs, services, and rates are ineligible to enroll in the CleanPowerSF CSGT rate:

- IOU bundled service;
- Direct access;
- Standby service;
- Net energy metering (“NEM”) rates;
- Non-metered service;
- Non-residential rates (except for the program sponsor); and
- Customers enrolled in the CleanPowerSF Disadvantaged Communities Green Tariff (“DAC-GT”) rate schedule.

Master-metered customers may participate in the CleanPowerSF CSGT program as long as the master-metered account holder enrolls all usage under the master-metered account in the program. Individual tenants of a master-meter customer are not eligible to participate on an individual basis. Master-metered customers must also meet all other eligibility requirements.

The eligibility of customers is verified at the level of the Service Agreement ID (“SAID”).

b. Sponsor Eligibility

A non-profit community-based organization (“CBO”) may “sponsor” a community solar project on behalf of residents, and in doing so also receive a 20% discount on eligible SAIDs. To “sponsor” a community solar project, the eligible organization must first demonstrate its community involvement. The sponsor’s role is to work with the project developer to encourage program participation in its community.

To receive the 20% discount on eligible SAIDs as described below, the sponsor must fulfill the following requirements:

1. The sponsor must be a CleanPowerSF electric customer;
2. The sponsor must take service on the CleanPowerSF Community Solar Green Tariff;
3. The sponsor must be located within a disadvantaged community served by CleanPowerSF and within five miles of the solar project;² and
4. The sponsor must meet all other eligibility requirements of any participating customer as described in the section on CleanPowerSF CSGT customer eligibility above, including ensuring that its rate schedule is not ineligible.

A sponsor that does not fulfill each of the requirements above may still become a project sponsor, however, they are not eligible to receive the 20% discount.

There may be more than one sponsoring entity supporting a single community solar project. Multiple sponsors may share the 20% discount as long as all sponsors meet the eligibility requirements outlined above. A sponsor may also be (although is not required to be) a project site host.³

II. Enrollment Terms

a. Residential Customer Eligibility

Enrollment of customers under Schedule CleanPowerSF CSGT occurs at the level of the SAID. Customer enrollment is capped at a maximum of 2 MW solar equivalent per SAID. This limitation does not apply to a federal, state, or local government, school or school district, county office of education, the California Community Colleges, the California State University, or the University of California.

² D.18-06-027, p.78

³ For the purposes of this program, the concept of a “host” only refers to a customer site where the project is located. The community solar project must be located in-front-of-the-meter, even if located at a customer host site.

Customers subscribe to a percentage of their community solar project's capacity based on their previous 12-month average monthly usage. This percentage allocation is set at the time of customer subscription but may be revisited periodically to ensure accurate allocations of project energy produced. Customers cannot be subscribed to more than one community solar project.

Eligible low-income customers may enroll under the rate on a first-come, first-serve basis. Once 50% of project capacity is subscribed by low-income customers, non-low-income qualified customers located in DACs will become eligible for enrollment on a first-come, first-served basis until customer subscriptions reach the CleanPowerSF CSGT program cap. Once the program cap is reached, a waitlist will be maintained for new subscriptions. When program capacity becomes available, San Francisco will continue enrolling eligible customers either from the waitlist (if applicable), or on a first-come, first-served basis up to the program cap. Non-low-income customers can be recruited before the 50% subscription requirement for low-income customers is met. However, the non-low-income customers will be placed on a waitlist until 50% of the project capacity is subscribed by low-income customers. If the low-income subscription rate drops below 50% over the life of the project, existing non-low-income customers are not required to go back on a waitlist, but new enrollments of non-low-income program participants will be suspended until the 50% low-income threshold is met again. During this time, new enrollments of non-low-income participants will be put on a waitlist until the 50% threshold is met.

Upon confirmation of eligibility, San Francisco will place the customer on the CleanPowerSF CSGT rate on the first day of the next billing cycle where the billing cycle start date occurs at least 5 business days after the date San Francisco determines the customer's eligibility for enrollment. A customer request for service under the CleanPowerSF CSGT rate that is received less than 5 business days before the customer's next billing cycle may result in the customer being placed on the CleanPowerSF CSGT rate for the following billing cycle.

A participating customer may remain on the CleanPowerSF CSGT tariff for the duration of the solar project's contract term, or up to 20 years, whichever is less.⁴ There is no contract or minimum commitment required when a customer enrolls in the CleanPowerSF CSGT program and there are no fees for enrollment or cancellation. Cancellation of a customer's participation will become effective on the next meter read date after a cancellation request is made; cancellations made less than five (5) business days of the next meter read date may not be changed for an additional billing cycle. Customer participation in the CPUC-funded program will automatically terminate should the power supply agreement between CleanPowerSF and the CSGT project to which the customer is subscribed be terminated or the delivery term ends.

If a customer moves within CleanPowerSF service territory, they will need to reestablish their eligibility for the program. If the customer is found to still be eligible, San Francisco will add the customer to the program if capacity allows or add them to the end of the waitlist. San Francisco will review the waitlist on a monthly basis and add customers as CleanPowerSF CSGT project capacity allows.

b. Sponsor Enrollment

⁴ This expiration applies to the CPUC-funded DAC Solar programs only, San Francisco may continue offering comparable programs beyond the 20-year timeframe.

A sponsor of a CleanPowerSF CSGT project is subject to the same enrollment rules and requirements as described above for residential customers with one modification. A sponsor's subscription allocation is limited to a maximum of 25% of the project's energy output, not to exceed the sponsor's energy needs. The same principle applies if multiple sponsors share the 20% discount. If two or more sponsors are designated, the sponsors will need to inform San Francisco in writing how to allocate the "discountable usage" between them.

III. Rates

a. Residential Customer Rates

Customers taking service on this rate schedule will receive a 20% discount on the electric portion of their bill compared to their otherwise applicable rate schedule or OAS. The discount applies as long as the customer is enrolled under the program and complies with all of the eligibility and enrollment terms.

For low-income customers, the OAS is the customer's existing CARE or FERA rate. Accordingly, the 20% discount will be applied to bills after the CARE/FERA discount has been applied. The discount applies as long customers are enrolled under the program and comply with all of the eligibility and enrollment terms.

For customers who are not enrolled in CARE or FERA, the OAS is the customer's existing rate schedule before program enrollment. Residential customer SAIDs that are already enrolled in CleanPowerSF's other 100% renewable energy generation service option (i.e. CleanPowerSF's "SuperGreen" product) will be switched to CleanPowerSF's base product (i.e. CleanPowerSF's "Green" product) for the purposes of calculating the 20% discount when enrolling under the program.

b. Sponsor Rates

A CleanPowerSF CSGT project sponsor who meets all of the eligibility requirements outlined above receives a 20% bill discount on its enrolled account. The sponsor bill discount will be calculated based on the same methodology as described above for residential program participants with one modification. The sponsor bill discount is only applied to a sponsor's subscription allocation, i.e. limited to a maximum of 25% of the project's energy output, not to exceed the sponsor's energy needs under the enrolled SAID. The discount applies as long as sponsors are enrolled under the programs and they comply with all the sponsor eligibility and enrollment terms described above.

If two or more sponsors are designated, both sponsors must inform San Francisco in writing of how the "discountable usage", capped at 25% of the project's energy output is to be allocated among them. San Francisco will then calculate the applicable discount to each sponsor accordingly.

The sponsor's discount is available to sponsors only after the community solar project has reached its required minimum 50% low-income subscription rate. If the subscription rate of low-income customers drops under 50% of project capacity at any time throughout the life of the project, the sponsor bill credit will not be revoked.

IV. Billing

Monthly bills are calculated in accordance with the customer's OAS and the provisions contained herein. The amount credited under Schedule CleanPowerSF CSGT is provided by both PG&E and San Francisco: San Francisco calculates the 20% discount for the generation portion of the electric bill and PG&E calculates the 20% discount for the delivery portion of the electric bill.

Both entities display the discount on their respective portion of the customer's utility bill.

V. Metering

All customers must be metered according to the requirement of their OAS.

APPENDIX C – AL 12E

CleanPowerSF Disadvantaged Communities Green Tariff and CleanPowerSF
Community Solar Green Tariff Programs Budget Forecast for Program Years
2021 and 2022



Services of the San Francisco
Public Utilities Commission



CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Budget Forecast for Program Years 2021 and 2022
Page 1 of 4

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, San Francisco hereby submits this budget forecast for the CleanPowerSF Disadvantaged Communities Green Tariff (DAC-GT) and CleanPowerSF Community Solar Green Tariff (CSGT) programs for Program Years 2021 and 2022.¹

San Francisco requests that the proposed budgets be approved by the CPUC, and that the CPUC direct PG&E to transfer funds to meet the CleanPowerSF programs’ approved annual 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:²

- Generation cost delta, if any;³
- 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); and
- Program evaluation costs.

In addition to budget forecasts, annual program budget submissions must also include details on program capacity and actual customer enrollment numbers for both programs. San Francisco will report on:

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

¹ In future program years, this annual program budget will also include actual program costs from the previous program year, as well as a reconciliation of forecasted versus actual costs.

² A detailed description of each budget line item can be found in San Francisco’s Implementation Plan, submitted as Appendix A to the Implementation Advice Letter.

³ 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.’

CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff
Budget Forecast for Program Years 2021 and 2022
Page 2 of 4

- 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 E 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 12-E, Appendix E, 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 years 2021 and 2022, San Francisco requests a total budget of \$1,607,261 for the CleanPowerSF DAC-GT and CleanPowerSF 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 2021 and 2022 Budget Forecast

Category	DAC-GT		CSGT	
	2021	2022	2021	2022
DAC-GT Generation Cost Delta	\$ 130,439	\$ 527,955	\$ -	\$ -
Bill Discount	\$ 38,890	\$ 160,227	\$ -	\$ -
Program Administration				
Program Management	\$ 91,786	\$ 62,445	\$ 51,650	\$ 76,421
Information Technology	\$ 14,565	\$ 3,444	\$ 14,565	\$ 8,444
Billing Operations	\$ 17,166	\$ 15,852	\$ 4,378	\$ 4,043
Regulatory Compliance	\$ 13,122	\$ 4,994	\$ 3,346	\$ 1,274
Procurement	\$ 48,365	\$ 33,721	\$ 46,473	\$ 17,874
Program Administration Total	\$ 185,004	\$ 120,456	\$ 120,412	\$ 108,056
Marketing, Education, and Outreach	\$ 47,913	\$ 95,795	\$ 37,081	\$ 35,033
Program Total	\$ 402,246	\$ 904,433	\$ 157,493	\$ 143,089
First 2 PY Total				\$ 1,607,261

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

a. Generation Cost Delta

San Francisco does not anticipate having new CleanPowerSF DAC-GT projects come online before 2022 and CSGT projects come online before 2023 because San Francisco must first run solicitations to purchase energy from the to-be-constructed projects. The generation cost delta budget forecast for the CleanPowerSF DAC-GT assumes the usage of an existing interim resource to accelerate program launch.

b. Bill Discount

As described in the Implementation Plan, San Francisco proposes to calculate the 20% discount for the generation and delivery portions of the electric bill. San Francisco will apply a 20% discount to the generation portion of the bill. Pacific Gas & Electric, the investor owned utility providing transmission and distribution services to the customers, will be responsible for applying the 20% discount on the delivery portion of the bill for CCA program participants.

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 operations and customer support once all systems are developed. Regulatory covers regulatory and 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. Procurement costs also include pre-mobilization staff hours for DAC-GT and CSGT power solicitation preparation to ensure the CleanPowerSF DAC-GT and CSGT program solicitation materials are prepared in accordance with established City and County of San Francisco processes and procedures in the timeline set by the CPUC following Advice Letter approval.

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) Grants provided to local community-based organizations who serve as project sponsors for the CleanPowerSF CSGT program. More detail on the ME&O budget is included in Appendix D of the CleanPowerSF AL 12-E filing.

e. Evaluation, Measurement and Verification (EM&V)

San Francisco is not budgeting separate EM&V costs for its program. CleanPowerSF's program evaluation will be covered by the IOU's EM&V budget for a statewide independent evaluator.

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.⁴ However, administration and budget costs may exceed these caps in the first two years of program implementation (PY 2021 and 2022 for San Francisco) because the program start-up costs will be higher.

⁴ 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.

V. Program Capacity and Enrollment Caps

San Francisco includes forecasted program capacity and enrollment in Tables 2 and 3 below. San Francisco does not report existing program capacity and enrollment as the programs have yet to launch.

Table 2 DAC Green Tariff Capacity and Enrollment Forecasts

	2021	2022	Total
Estimated Capacity to be Procured	1.826 MW (Interim)	1.826 MW (New Resource)	1.826 MW
Estimated Customer Enrollment	1,220	0	1,220

Table 3 Community Solar Green Tariff Capacity and Enrollment Forecasts

	2021	2022	Total
Estimated Capacity to be Procured	0	0.5525 MW	0.5525 MW
Estimated Customer Enrollment	0	TBD	TBD

VI. Cost Recovery and Transfer Procedures

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

For 2021 program funds, San Francisco 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 ERRA.

VII. Conclusion

San Francisco respectfully requests that the CPUC approve San Francisco's proposed budgets for the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs and direct PG&E to transfer funds sufficient to meet San Francisco's approved annual budgets per the funding mechanisms and processes discussed above.

APPENDIX D – AL 12E

CleanPowerSF Disadvantaged Communities Green Tariff and CleanPowerSF
Community Solar Green Tariff Marketing, Education and Outreach Plan for
Program Years 2021 and 2022



Services of the San Francisco
Public Utilities Commission



I. Purpose and Goals

The overarching goal of the DAC-GT and CSGT programs is to provide low-income customers living in disadvantaged communities (DAC) with access to the benefits of locally generated, 100 percent renewable energy and a 20 percent discount on their electricity rates. The City and County of San Francisco, through the San Francisco Public Utilities Commission (“SFPUC”) will implement 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. San Francisco’s 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 and achieve a 75% enrollment rate within two years of program launch;
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 achieve these goals, San Francisco will implement a culturally-competent, multilingual ME&O Plan that will target customers in DACs served by the CleanPowerSF program in two phases, mimicking a funnel approach that is well researched and tested by marketing professionals:

1. Phase I: Awareness

Phase I will focus on increasing customer awareness of CleanPowerSF and CARE /FERA, with the intent to increase participation in the discount programs and thus expand the potential number of customers eligible for CleanPowerSF DAC-GT and CleanPowerSF CSGT. This phase will also aim to improve customers’ understanding of their energy usage, saving options, and other customer incentives, discounts, and programs. This campaign will leverage tactics intended for communities like geo-specific digital and print media buys, and direct customer email and mailings.

2. Phase 2: Enrollment will focus on customer enrollment in the CleanPowerSF DAC programs while addressing barriers to participation in clean energy programs and savings. This campaign will focus primarily on grassroots outreach through community-based organization (“CBO”) partnerships, event sponsorships, and direct customer marketing and engagement.

To support message development for both phases, San Francisco will develop and test materials, research barriers to participation, and develop creative designs for collateral such as social content, mailings, and other materials. Ultimately, San Francisco will measure success by

the number of customers enrolled in the CleanPowerSF DAC programs, the number of new enrollments in the CARE and FERA discount programs, and total number of customers reached during the campaign.

Section II describes San Francisco's overall ME&O approach which is applicable to both the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs. Sections III and IV discuss tactics that are unique to the CleanPowerSF DAC-GT program and the CleanPowerSF CSGT program. Section V summarizes the ME&O budget for 2020-2021, and Section VI provides an overview of the timeline for ME&O activities.

II. ME&O Approach for CleanPowerSF DAC-GT and CleanPowerSF CSGT

a. Guiding Principles

San Francisco is committed to developing culturally appropriate communication strategies to ensure that stakeholders can participate in decisions and actions that impact their communities. As such, San Francisco commits to the following guiding principles throughout the ME&O engagement process for the CleanPowerSF DAC green program. 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. Due to COVID-19 shelter in place restrictions, some of this engagement may occur in virtual meeting spaces or via no-contact options like neighborhood flyers posted at essential events/business (like grocery stores and farmers markets).
- Build a collaborative process with community partners to ensure barriers to participation are overcome and benefits to participation are maximized in ME&O activities.

b. Target Audiences

In accordance with the DAC-GT and CSGT program eligibility criteria, San Francisco's primary target audience is CleanPowerSF customers who are low-income and live in DACs. Currently, CleanPowerSF's service territory includes 11 DAC census tracts with an estimated 15,800 residential CleanPowerSF customer accounts.

San Francisco's ME&O outreach will target low-income DAC residents including: renters and individually-metered residents; underserved communities, including Black, Latinx, and Chinese residents, non-English monolingual speakers, including, for example, Spanish, Chinese, Russian, and Filipino speakers; and seniors and people with disabilities in disadvantaged communities in CleanPowerSF's service territory. This includes people in the following census tracts:

- 6075012301
- 6075012502
- 6075017601
- 6075017801
- 6075023102
- 6075023103
- 6075023200
- 6075023300
- 6075023400
- 6075061200
- 6075980600

San Francisco will also reach out to other audiences like customers in DACs who do not meet CARE and FERA income requirements to maximize enrollment in the CleanPowerSF CSGT program. As the CPUC requires, San Francisco will limit enrollment to residents living in a DAC within CleanPowerSF's service territory and ensure a minimum of half of enrollees meet CARE or FERA program requirements.

c. Outreach and Engagement

To meet our ME&O goals, San Francisco will conduct outreach and engagement in two phases summarized below. The ME&O Plan includes a targeted, multilingual and culturally competent approach to engagement and address the specific needs of DAC communities in San Francisco.

Throughout the outreach engagement process, the SFPUC will coordinate with the many other City and County departments already conducting outreach in DAC communities. The SFPUC 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.

1. **Awareness** to increase customer recognition of CleanPowerSF, CARE/FERA, and energy usage, savings options and other customer incentives, discounts, and programs.
 - a. **Digital and Print Advertisements:** The SFPUC will utilize geo-specific digital advertisements like social media (Facebook and/or Nextdoor), Google Display and Google AdWords as well as local print advertising to educate customers about CleanPowerSF, CARE/FERA, and other potential customer incentives, discounts, and programs.
 - b. **Direct mailings and email marketing:** Direct mailing and email marketing will also be utilized to target customers in DAC communities. This material will be translated and improved throughout the ME&O Plan via message testing to ensure it is culturally competent and effective.
 - c. **Communications materials and website:** A variety of communications and media content will be developed to support this phase like flyers and fact sheets as well as a dedicated web page on CleanPowerSF's website. These materials will be translated and improved upon throughout the ME&O process via message

testing to ensure they are culturally competent and effective. Distribution of materials will be adjusted to meet potential COVID-19 shelter in place restrictions (such as no-contact drop-offs or a stronger reliance on virtual materials).

2. **Enrollment** to pro-actively sign up customers in the CleanPowerSF DAC programs while addressing barriers to participation in clean energy programs.

- a. **Partnerships with community-based organizations:** Partnering with CBOs is a critical component of San Francisco's ME&O plan. CBOs have intimate knowledge of their communities and will serve as valuable resources for how best to conduct outreach that makes sense for members of their communities. As San Francisco engages with CBO partners, we seek to establish open dialogue, build awareness and understanding among community members, identify community-specific issues, and develop methods for disseminating relevant information.

Specifically, San Francisco will solicit CBO participation through a transparent process and provide support for them to conduct outreach around the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs, CARE and FERA enrollment, and other energy programs, such as energy efficiency programs. CBOs will help coordinate workshops and webinars to provide CleanPowerSF DAC-GT and CleanPowerSF CSGT program information to their constituencies. This will include leveraging existing CBO workshops and/or events. If COVID-19 shelter-in place restrictions are still in place, and to recognize that some of our target audience may be reluctant to gather irrespective of the absence of restrictions, some of these events may be held virtually or utilizing alternative methods. As community events and workshops are held, we will closely track the diversity in race, age and income of participants, to ensure that participation reflects census distribution demographics of the DAC communities. Additionally, we will maximize convenience of in-person meetings and events to public transportation, ensure events are ADA accessible, and provide food.

- b. **Grassroots outreach and community events:** San Francisco will conduct grassroots outreach to engage directly with community members at community events and/or at places of gathering such as farmers markets and grocery stores. Before the COVID-19 pandemic, the City and County of San Francisco regularly attended and sponsored many community events throughout San Francisco including neighborhood festivals, holiday celebrations, and special events. During the ME&O process for the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs, San Francisco will focus on expanding the breadth of events and avenues attended and sponsored in the program-eligible neighborhoods. If shelter-in place restrictions due to COVID-19 are still in effect at the time of engagement, San Francisco will focus on virtual events and no-contact flyers at essential events/business (like grocery stores and farmers markets). San Francisco will utilize the expertise of CBO partners to identify impactful events and avenues. Outreach will be informed by data (census tracts, COVID-19 impacts, enrollment in existing utility programs like affordability programming, etc.) in order to identify customers who are most likely to enroll in the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs.

- c. Digital and print advertisements: San Francisco will utilize geo-specific digital advertisements like social media (Facebook and/or Nextdoor), Google Display and Google AdWords as well as local print advertising to enroll customers in the CleanPowerSF DAC-GT and CleanPowerSF CSGT programs.
- d. Direct customer mailings and email marketing: Direct mailing and email marketing will also be utilized to target customers in DAC communities. This material will be translated and improved throughout the ME&O Plan via message testing to ensure it is culturally competent and effective.
- e. Communications materials and website: A variety of communications and media content will be developed to support this phase like flyers and fact sheets as well as a dedicated web page on CleanPowerSF's website. These materials will be translated and improved upon throughout the ME&O process via message testing to ensure they are culturally competent and effective. These materials will be made available online to ensure they are accessible during COVID-19.

To support the engagement tactics listed above, San Francisco will develop and test outreach materials (like fliers, social content, and mailings), and research barriers to participation.

III. ME&O Evaluation

Because San Francisco is using multiple tactics for ME&O, a variety of metrics will be used to evaluate the effectiveness of each effort. Our primary measure of effectiveness is the number of customers reached, which can be measured by:

- 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 DAC-GT/CS-GT 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, San Francisco 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.

a. CleanPowerSF DAC-GT Specific ME&O Approach

ME&O for the CleanPowerSF DAC-GT program will utilize all the strategies described above and will be the primary focus of San Francisco's ME&O activities during PYs 2021 and 2022.

b. CleanPowerSF CSGT Specific ME&O Approach

ME&O for the CleanPowerSF CSGT program will also utilize all of the tactics described in section II, with greater emphasis on grassroots marketing and targeted marketing in the specific DACs in which CleanPowerSF CSGT Projects are being or have been developed. All residential customers in a DAC and within five miles of the CleanPowerSF CSGT Project will be targeted for participation. Outreach targets will include non-income qualified residents of those communities, who will be eligible for enrollment in CSGT after 50 percent of a CSGT project has been subscribed by income-qualified residents. In addition to messaging about program benefits, the San Francisco's CSGT outreach will speak to the localized benefits specific to the community in which the CleanPowerSF CSGT Project is located including economic development, community sponsorship, and community resilience.

The CleanPowerSF CSGT program also relies on a project sponsor or sponsors to help disseminate information about the program and enroll customers. Given the project sponsor's local expertise of the area, San Francisco will partner with the sponsor on the best outreach tactics and methods for potential customers within the program area.

IV. ME&O Budget

San Francisco's total ME&O budget proposal for PYs 2021 and 2022 is \$215,822. Table 1 below includes a summary of the budget by cost category.

Table 1 CleanPowerSF's Proposed ME&O Budget

Item	DAC-GT		CSGT	
	2021	2022	2021	2022
General Marketing	\$ 10,000	\$ 21,000	\$ 5,000	\$ 6,250
Targeted Marketing	\$ 5,000	\$ 26,000	\$ 2,500	\$ 4,000
Research, Message Testing	\$ 25,000	\$ -	\$ 25,000	\$ -
CBO Engagement	\$ -	\$ 25,000	\$ -	\$ 11,000
Staff Time	\$ 7,913	\$ 23,795	\$ 4,581	\$ 13,783
Total	\$ 47,913	\$ 95,795	\$ 37,081	\$ 35,033

Appendix E – AL 12E

CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar
Green Tariff Bill Discount and Generation Cost Delta Workpapers



Services of the San Francisco
Public Utilities Commission



CleanPowerSF DAC-GT & CS-GT Budget PY 2021 and 2022

1. Budget Forecast PY 2021 and 2022

Category	DAC-GT		CSGT	
	2021	2022	2021	2022
DAC-GT Generation Cost Delta	\$ 130,439	\$ 527,955	\$ -	\$ -
Bill Discount	\$ 38,890	\$ 160,227	\$ -	\$ -
Program Administration				
Program Management	\$ 91,786	\$ 62,445	\$ 51,650	\$ 76,421
Information Technology	\$ 14,565	\$ 3,444	\$ 14,565	\$ 8,444
Billing Operations	\$ 17,166	\$ 15,852	\$ 4,378	\$ 4,043
Regulatory Compliance	\$ 13,122	\$ 4,994	\$ 3,346	\$ 1,274
Procurement	\$ 48,365	\$ 33,721	\$ 46,473	\$ 17,874
Program Administration Total	\$ 185,004	\$ 120,456	\$ 120,412	\$ 108,056
Marketing, Education, and Outreach	\$ 47,913	\$ 95,795	\$ 37,081	\$ 35,033
Program Total	\$ 402,246	\$ 904,433	\$ 157,493	\$ 143,089
First 2 PY Total	\$	\$	\$	1,607,261

2. Program Capacity and Procurement Summary PY 2021 and 2022

Existing Capacity

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

Planned Capacity

Category	DAC-GT		CSGT	
	2021	2022	2021	2022
Estimated Capacity to be Procured (MW)	1.826*	1.826	0	0.5525
Forecasted Customer Enrollment	1,220	1,220	0	0

*Planned interim resource procurement

Appendix F – AL 12E

CCA Capacity Transfers Under the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs



Services of the San Francisco
Public Utilities Commission





December 2, 2020

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

RE: CCA Capacity Transfer under the Disadvantaged Community Green Tariff and Community Solar Green Tariff Programs

Resolution E-4999 allows Community Choice Aggregators (“CCAs”) that serve customers in the same investor-owned utility (“IOU”) service territory to share and/or trade program capacity.¹ The resolution also stipulates that if a CCA elects to trade or share capacity, the trade must be affirmed in writing by all CCAs whose program capacity is implicated in the proposal. This letter affirms the trading of capacity between CCAs under the Disadvantaged Community Green Tariff (“DAC-GT”) and the Community Solar Green Tariff (“CS-GT”) programs as authorized under Resolution E-4999. As confirmed in an email with Energy Division staff on November 25, 2020, this letter is being submitted as an alternative to, and in lieu of, the CCAs implicated by this proposal submitting separate written comments in response to the CCAs’ advice letters.

Some CCAs in PG&E’s service territory have elected to not pursue one or both of the DAC-GT and CS-GT programs and to forego their capacity allocations per Resolution E-4999. These non-participating CCAs have elected to transfer their allocations to the participating CCAs in PG&E’s service territory. The CCA’s involved, both participating and non-participating, have agreed to distribute the transferred capacity in equal parts among the participating CCAs and are confirming such transfer in this letter.

Capacity Transfer under the DAC-GT Program

Sonoma Clean Power (“SCP”), Central Coast Community Energy (“3CE”), formerly known as Monterey Bay Community Power, and Silicon Valley Clean Energy Authority (“SVCE”) have determined to not implement the DAC-GT program and to trade their program capacity to the participating CCAs in equal parts.² The CCAs that will implement the DAC-GT program include East Bay Community Energy (“EBCE”), CleanPowerSF, Marin Clean Energy (“MCE”), Peninsula Clean Energy Authority (“PCE”) and City of San José, in its capacity as administrator of San Jose Clean Energy (“SJCE”). The following table shows the assigned program capacity for

¹ Resolution E-4999 at 16 and 54 (Findings and Conclusions 17).

² Valley Clean Energy Authority has also chosen to not implement the DAC-GT program but was not included in the capacity transfer process due to its negligible program capacity allocation.



each of the non-participating CCAs per table 1 in Resolution E-4999,³ as well as the capacity being transferred to each participating CCA.

Transferring CCA	Capacity being Transferred (MW)	Receiving CCAs				
		EBCE	CleanPowerSF	MCE	PCE	SJCE
SVCE	0.5	0.100	0.100	0.100	0.100	0.100
SCP	0.5	0.100	0.100	0.100	0.100	0.100
3CE	0.68	0.136	0.136	0.136	0.136	0.136
TOTAL	1.68	0.336	0.336	0.336	0.336	0.336

Capacity Transfer under the CS-GT Program

SCP, 3CE, SVCE, and SJCE have determined to not implement the CS-GT program and to trade their program capacity to the participating CCAs in equal parts. The CCAs that will implement the CS-GT program include EBCE, CleanPowerSF, MCE, and PCE. The following table shows the assigned program capacity for each of the non-participating CCAs per table 1 in Resolution E-4999,⁴ as well as the capacity being transferred to each participating CCA.

Transferring CCA	Capacity being Transferred (MW)	Receiving CCA			
		EBCE	CleanPowerSF	MCE	PCE
SJCE	0.36	0.0900	0.0900	0.0900	0.0900
SVCE	0.09	0.0225	0.0225	0.0225	0.0225
SCP	0.06	0.0150	0.0150	0.0150	0.0150
3CE	0.18	0.0450	0.0450	0.0450	0.0450
TOTAL	0.69	0.1725	0.1725	0.1725	0.1725

All of the undersigned CCAs affirm the capacity transfers under the DAC-GT and CS-GT programs as described above.

Sincerely,

³ Resolution E-4999 at 14

⁴ Id.



Shalini Swaroop
/s/ Shalini Swaroop (Dec 15, 2020 15:24 PST)

Shalini Swaroop
General Counsel & Director of Policy
Marin Clean Energy

Michael A. Hyams
/s/ Michael A. Hyams (Dec 15, 2020 15:36 PST)

Michael Hyams
Deputy Manager, CleanPowerSF
San Francisco Public Utilities Commission

JP Ross
/s/ JP Ross (Dec 15, 2020 22:04 PST)

JP Ross
Senior Director, Local Development,
Electrification and Innovation
East Bay Community Energy

[Signature]
/s/

Leland Wilcox
Chief of Staff, Office of the City Manager
City of San José - San José Clean Energy

Neal Reardon
/s/ Neal Reardon (Dec 16, 2020 07:50 PST)

Neal Reardon
Director, Regulatory Affairs
Sonoma Clean Power Authority

Poonum Agrawal
/s/ Poonum Agrawal (Dec 16, 2020 08:31 PST)

Poonum Agrawal
Senior Regulatory Analyst
Silicon Valley Clean Energy Authority

[Signature]
/s/ Joseph Wiedman (Dec 16, 2020 11:23 PST)

Joseph Wiedman
Director of Legislative and Regulatory Affairs
Peninsula Clean Energy Authority

Stephen Keehn
/s/ Stephen Keehn (Dec 16, 2020 12:13 PST)

Stephen Keehn
Int. Director, Regulatory Affairs
Central Coast Community Energy

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

**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)

And Related Matter.

A.16-07-015

**DECLARATION OF MICHAEL A. HYAMS IN SUPPORT OF CONFIDENTIAL
TREATMENT OF DATA AND INFORMATION CONTAINED IN APPENDIX E OF
CLEANPOWRSF ADVICE LETTER 12-E TO APPROVE THE ESTABLISHMENT AND
IMPLEMENTATION OF DISADVANTAGED COMMUNITIES GREEN TARIFF
PROGRAM AND THE COMMUNITY SOLAR GREEN TARIFF PROGRAM RATES**

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 and D.08-04-023, and the 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. 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.
7. 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
8. 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 category] information may be easily derived” is eligible for the confidential treatment specified in the corresponding Confidentiality Matrix category.³
9. The attached table specifies the protected categories of information under which the data and information fall, and why confidential treatment is justified.
10. CleanPowerSF is complying with the limitations on confidentiality specified for the particular type of data, as listed in the table.
11. 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.

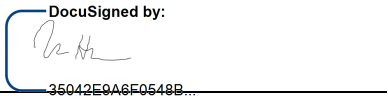
² D.06-06-066, as modified by D.07-05-032, pgs. 5-6. “[T]he test for non-disclosure to the public includes whether ‘the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.’ (See e.g., Gov. Code,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

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).

12. 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.
13. Based on the foregoing, I make this Declaration supporting the confidential treatment of data and information contained in Appendix E of CleanPowerSF Advice Letter 12-E to Approve the Establishment and Implementation of Disadvantaged Communities Green Tariff Program and the Community Solar Green Tariff Program Rates, submitted December 31, 2020.

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

Executed on December 31, 2020, at San Francisco, California.

By:  35042E0A6F0548B
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@sfwater.org

DECLARATION OF MICHAEL A. HYAMS IN SUPPORT OF CONFIDENTIAL TREATMENT OF DATA AND INFORMATION CONTAINED IN APPENDIX E OF CLEANPOWERSF ADVICE LETTER 12-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 E of CleanPowerSF Advice Letter 12-E, Supporting the Calculation of the Generation Cost Delta and the 20% Bill Discount</p> <p>(Confidential information highlighted in yellow)</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, including information provided to CleanPowerSF on 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 a confidential price cap from the California Public Utilities Commission and confidential expert projections of future rates. Additionally, any values that can be used to back calculate this information should also be kept confidential.</p>	<p>Indefinitely.</p>

**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.	Rulemaking 14-07-002 (Filed July 10, 2014)
And Related Matter.	Application 16-07-015 (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 **December 31, 2020**, I served **CleanPowerSF Advice Letter 12-E: Approve the Establishment and Implementation of Disadvantaged Communities Green Tariff Program and the Community Solar Green Tariff Program (Public Version)** via electronic mail, in PDF/A format, on all parties in Proceeding Nos. **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 **December 31, 2020** in San Francisco, California.

/s/ Paula Fernandez
Paula Fernandez



California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: R1407002 - CPUC - OIR TO DEVELO
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: DECEMBER 29, 2020

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[TOP OF PAGE](#)
[BACK TO INDEX OF SERVICE LISTS](#)