

## California Public Utilities Commission

# ADVICE LETTER SUMMARY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)						
Company name/CPUC Utility No.:						
Utility type:  ELC GAS WATER  PLC HEAT	Contact Person: Phone #: E-mail: E-mail Disposition Notice to:					
EXPLANATION OF UTILITY TYPE  ELC = Electric GAS = Gas WATER = Water  PLC = Pipeline HEAT = Heat	(Date Submitted / Received Stamp by CPUC)					
Advice Letter (AL) #:	Tier Designation:					
Subject of AL:  Kowwords (chaosa from CRUC listing):						
Keywords (choose from CPUC listing):  AL Type: Monthly Quarterly Annual	al One-Time Other:					
	on order, indicate relevant Decision/Resolution #:					
ii Az sabriitted iii compilarice with a commissi	on order, indicate relevant becision, resolution					
Does AL replace a withdrawn or rejected AL?	f so, identify the prior AL:					
Summarize differences between the AL and th	e prior withdrawn or rejected AL:					
Confidential treatment requested? Yes No						
If yes, specification of confidential information:  Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:						
Resolution required? Yes No						
Requested effective date:	No. of tariff sheets:					
Estimated system annual revenue effect (%):						
Estimated system average rate effect (%):						
When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).						
Tariff schedules affected:						
Service affected and changes proposed <sup>1:</sup>						
Pending advice letters that revise the same tai	riff 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: <a href="mailto:EDTariffUnit@cpuc.ca.gov">EDTariffUnit@cpuc.ca.gov</a>

Name: Title:

Utility Name: Address: City:

State: Zip:

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

Email:

Name:

Title:

Utility Name: Address:

City:

State: Zip:

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

Email:

### **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			
Curtailable 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				



June 14, 2021

California Public Utilities Commission Energy Division Attention: Tariff Unit 505 Van Ness Avenue, 4<sup>th</sup> Floor San Francisco, CA 94102

Email: <a href="mailto:EDTariffUnit@cpuc.ca.gov">EDTariffUnit@cpuc.ca.gov</a>

RE: CleanPowerSF Advice Letter 15-E
Updated CleanPowerSF Disadvantaged Communities Green Tariff and
Community Solar Green Tariff Program Administration Budgets

#### **Purpose**

Pursuant to Ordering Paragraphs ("OPs") 6 and 9 of California Public Utilities Commission ("Commission") Resolution E-5124 ("E-5124"), the City and County of San Francisco ("San Francisco") respectfully submits this Tier 1 Advice Letter to update the final 2021 and 2022 Disadvantaged Communities Green Tariff ("DAC-GT") and Community Solar Green Tariff ("CSGT") program administration budgets for CleanPowerSF, San Francisco's Community Choice Aggregation ("CCA") program.<sup>1</sup>

This advice letter includes updated 2021 and 2022 DAC-GT and CSGT program budgets. Changes include adding PG&E's Community Choice Aggregator ("CCA") integration costs, updating the billing and IT budget to reflect costs associated with applying the full 20% discount on the CCA portion of the bill, and removing pre-mobilization costs.

#### **Background**

San Francisco filed CleanPowerSF Advice Letter 12-E, its Tier 3 Advice Letter to establish and implement the CleanPowerSF DAC-GT and CSGT programs on December 31, 2020. On April 15, 2021, the Commission issued E-5124 approving, with modification the CleanPowerSF DAC-GT and CSGT programs. E-5124 requires that San

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 <a href="cleanpowersf.org/privacy">cleanpowersf.org/privacy</a>.

**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.

London N. Breed Mayor

Sophle Maxwell President

Anson Moran Vice President

Tim Paulson Commissioner

Ed Harrington Commissioner

Newsha Ajami

Commissioner

Michael Carlin Acting General Manager



<sup>&</sup>lt;sup>1</sup> CleanPowerSF is operated by the San Francisco Public Utilities Commission.

Francisco file updated CleanPowerSF program administration budgets for 2021 and 2022 via a Tier 1 Advice Letter within 60 days of issuance of the Resolution.<sup>2</sup>

E-5124 directs San Francisco to make the following changes to its program administration budgets:

- Add PG&E CCA Integration costs which are defined as costs associated with "administrative, IT, or other discrete activities taken by PG&E in order to facilitate implementation of DAC-GT and CSGT CCA programs,3 and
- Remove CleanPowerSF "pre-mobilization" staff hour costs.<sup>4</sup>

In addition, San Francisco based its billing and IT budgets in its Implementation Advice Letter on a "hybrid" billing solution which was not adopted in E-5124. This "hybrid" solution would have required PG&E and CCAs to apply the 20% bill discount on their respective portions of the bill. E-5124 requires a manual billing process where PG&E will transmit billing data on a one-month lag to the CCAs, and the CCAs will present the entire 20% discount on their portion of the bill.<sup>5</sup>

E-5124 also requires PG&E to inform CCAs of PG&E CCA integration costs within 30 days of the issuance of the final Resolution.<sup>6</sup> Costs were to be evenly distributed amongst participating CCAs. PG&E provided the CCA Integration Costs on May 17, 2021.

#### **Discussion**

Based on the integration costs provided by PG&E, San Francisco adds a total of \$14,120 to CleanPowerSF's 2021 DAC-GT and CSGT program administration budgets and \$62,028 to its 2022 DAC-GT and CSGT program administration budgets to reflect its share of the integration costs. Table 1 summarizes the costs by program and year.

<sup>&</sup>lt;sup>2</sup> E-5124, OP 6 and 9. Note, OP 6 states within 60 days of approval but this appears to be an error because it is inconsistent with the rest of the related statement in E-5124.

<sup>&</sup>lt;sup>3</sup> E-5124, pp. 11, 25-26.

<sup>&</sup>lt;sup>4</sup> E-5124, pp. 23, 34 (OP 9).

<sup>&</sup>lt;sup>5</sup> E-5124 at page 12.

<sup>&</sup>lt;sup>6</sup> E-5124, OP 5.

Table 1 DAC-GT and CSGT PG&E CCA Integration Costs

	DAC-GT			CSGT				
	2021			2021				
	\$	12,856	\$	31,014	\$	1,263	\$	31,014
Total	\$			43,871	\$			32,278

CleanPowerSF also adjusts its billing and IT budgets from those provided in its implementation advice letter, CleanPowerSF Advice Letter 12-E, because those budgets were associated with the "hybrid" billing solution which was not adopted in E-5124. CleanPowerSF's program administration budgets have been updated to reflect the costs associated with displaying the entire 20% discount on the CCA portion of the bill as required by E-5124.

Pre-mobilization costs were included in the CleanPowerSF 2021 program budgets. As required by E-5124, these pre-mobilization costs have been removed from the 2021 DAC-GT and CSGT program administration budgets.

The final 2021 and 2022 CleanPowerSF DAC-GT and CSGT program budgets for inclusion in PG&E's 2022 Energy Resource Recovery Account ("ERRA") Forecast application are included in Appendix A to this advice letter.

### **Effective Date**

Pursuant to General Order 96-B, Energy Industry Rule 5.1, this Tier 1 advice letter is effective upon submittal.

#### Tier Designation

This advice letter has a Tier 1 designation pursuant to Ordering Paragraphs 6 and 9 of Resolution E-5124

#### **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 vis U.S. Mail or fax. Please submit protests or

responses to this Advice letter to <a href="mailto:EDTariffUnit@cpuc.ca.gov">EDTariffUnit@cpuc.ca.gov</a> and <a href="mailto:PowerRegulatory@sfwater.org">PowerRegulatory@sfwater.org</a>.

Anyone wishing to protest this advice letter may do so by sending a letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than twenty (20) days after the date of this filing, June 14, 2021. Protests should be submitted to:

California Public Utilities Commission Attention: Energy Division Tariff Unit 505 Van Ness Avenue, 4<sup>th</sup> Floor San Francisco, CA 94102

Facsimile: 415-703-2200

Email: <u>EDTariffUnit@cpuc.ca.gov</u>

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, 7<sup>th</sup> Floor
San Francisco, CA 94102

Email: PowerRegulatory@sfwater.org

#### **Notice**

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

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

### Conclusion

San Francisco respectfully requests that the Commission accept the updated CleanPowerSF DAC-GT and CSGT program administration budgets.

Michael A. Hyams

Director, CleanPowerSF

San Francisco Public Utilities Commission

525 Golden Gate Avenue, 7th Floor

San Francisco, CA 94102

Email: MHyams@sfwater.org

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

### Appendix A – AL 15-E

2021 and 2022 CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green Tariff Program Budgets







Table 1. 2021 and 2022 CleanPowerSF DAC-GT and CSGT Program Budget

Category	DAC-GT				CSGT				
Category	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	\$	63,916	\$	51,650	\$	76,421	
PG&E CCA Integration Costs	\$	12,856	\$	31,014	\$	1,263	\$	31,014	
Information Technology	\$	16,915	\$	8,844	\$	16,915	\$	8,844	
Billing Operations	\$	34,327	\$	41,692	\$	2,217	\$	8,803	
Regulatory Compliance	\$	13,122	\$	4,994	\$	3,346	\$	1,274	
Procurement	\$	41,895	\$	33,721	\$	35,666	\$	17,874	
Program Administration Total	\$	210,901	\$	184,182	\$	111,058	\$	144,230	
Marketing, Education, and Outreach	\$	47,913	\$	95,795	\$	37,081	\$	35,033	
Program Total	\$	428,144	\$	968,158	\$	148,139	\$	179,262	
First 2 PY Total	\$						1,	723,703	

# BEFORE THE BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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

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

#### **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 June 14, 2021, I served CleanPowerSF Advice Letter 15-E - Updated

CleanPowerSF Disadvantaged Communities Green Tariff and Community Solar Green

Tariff Program Administration Budgets via electronic mail on all parties in Proceeding No.

R14-07-002. I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on June 14, 2021 in San Francisco, California.

<u>s/Paula Fernandez</u> Paula Fernandez