



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

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

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

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

Does AL replace a withdrawn or rejected AL?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

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

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

Resolution required? Yes No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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

Tariff schedules affected:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

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

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name:
Title:
Utility/Entity Name:

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

Contact Name:
Title:
Utility/Entity Name:

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

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

April 3, 2023

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

**RE: CleanPowerSF Advice Letter 26-E
CleanPowerSF Disadvantaged Communities Green Tariff and Community
Solar Green Tariff Program Year 2024 Budget and Marketing, Education,
and Outreach Plan (Public Version)**

Purpose

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

Background

On June 21, 2018, the California Public Utilities Commission (“Commission” or “CPUC”) approved D.18-06-027, establishing the Disadvantaged Communities Green Tariff and Community Solar Green Tariff to increase the development and adoption of renewables in California’s disadvantaged communities

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.

London N. Breed
Mayor

Newsha K. Ajami
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Sophie Maxwell
Vice President

Tim Paulson
Commissioner

Anthony Rivera
Commissioner

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Commissioner

Dennis J. Herrera
General Manager



("DACs").¹ The DAC-GT and CSGT programs offer eligible customers 100% renewable energy at a 20% total electric bill discount.

Community Choice Aggregators ("CCAs") may develop their own DAC-GT and CSGT programs.² If a participating CCA submitted an implementation plan that shows compliance with all program rules in a Tier 3 advice letter ("AL") to the Commission by January 1, 2021, it can access greenhouse gas ("GHG") allowance revenues and public purpose program ("PPP") funds to support these programs after plan approval.³ CleanPowerSF filed its implementation Advice Letter on December 31, 2020, and received approval with modifications in Commission Resolution E-5124.⁴

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

The Commission also issued Resolution E-5125,⁷ elevating the Annual Budget Advice Letters "from Tier 1 to Tier 2 designation to allow for greater opportunity for stakeholder review and additional oversight."⁸ If a program administrator's proposed DAC-GT or CSGT budget exceeds either the 10% program administration or 4% ME&O cap, the budget must be accompanied by a rationale explaining why the exceedance is warranted in the Annual Budget Advice Letter.⁹

Discussion

CleanPowerSF submits this Tier 2 Advice Letter seeking Commission approval of its 2024 DAC-GT and CSGT budgets. CleanPowerSF DAC-GT and CSGT

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

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

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

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

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

⁶ *Id.* p. 68 (OP No. 4).

⁷ Resolution E-5125, p. 2.

⁸ *Id.* p. 2.

⁹ Resolution E-4999, p. 67 (OP No. 2); Resolution E-5125, p. 11 (OP No. 2).

program budgets and ME&O plan are attached to this Advice Letter as the following appendices:

- Appendix A: Program Budgets for CleanPowerSF Program Year 2024;
- Appendix B (Confidential): Workpapers supporting the calculation of the above market generation costs and 20% bill discount; and
- Appendix C: CleanPowerSF Marketing, Education and Outreach Plan for Program Year 2024.

CleanPowerSF has budgeted totals of \$806,541 for its DAC-GT program and \$80,968 for its CSGT program in 2024. The budgets include CleanPowerSF costs associated with above market generation, the 20% bill discount, program administration, and ME&O. Also included under program administration is CleanPowerSF's share of PG&E CCA integration costs which reflect expenses incurred by PG&E to facilitate implementation of CCA DAC-GT and CSGT programs.¹⁰ Table 1 summarizes CleanPowerSF's total program budgets for Program Year 2024.

Table 1. CleanPowerSF DAC-GT and CSGT 2024 Budgets

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

The 2022 DAC-GT and CSGT budgets were submitted via Tier 1 Advice Letter on June 14, 2021, for CleanPowerSF's DAC-GT and CSGT program year.¹¹ CleanPowerSF has unspent 2022 funds and reconciles forecasted costs to account for these. There is \$973,577 remaining to be carried forward in 2024.

¹⁰ Resolution E-5124, p. 11 (OP No. 1).

¹¹ CleanPowerSF Advice Letter 15-E.

The table below (“Table 2”) summarizes CleanPowerSF’s total budget request by program for Program Year 2024.

Table 2. CleanPowerSF New Budget Request

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

1. CleanPowerSF’s 2024 DAC-GT Budget

As shown below in Table 3, CleanPowerSF’s 2024 DAC-GT budget does not exceed the 4% ME&O budget cap established in Resolution E-4999 for the third program year.¹²

Table 3. CleanPowerSF DAC-GT Budget

	Total	% of Budget
Generation Cost Delta	\$ 400,259	50%
20% Bill Discount	\$ 254,168	32%
Program Administration	\$ 119,033	15%
ME&O	\$ 33,081	4%
Total	\$ 806,541	100%

The program administration cost category exceeds the 10% cap, representing 15% of the total program budget, in part, because CleanPowerSF does not expect that a fully automated billing solution between PG&E and CleanPowerSF’s billing provider will be in place by 2024. Instead, staff will need to manually transmit discount related data and perform quality control checks to ensure customers are receiving their bill discounts as expected. Using data provided from programs currently in operation, CleanPowerSF has budgeted additional time for these manual processes, resulting in higher costs. Additionally, there are fixed fees associated with compliance, such as Green-e® registration that do not scale with the size of the program. These fees account for a disproportionate share of a smaller program’s budget. As a result of these factors, CleanPowerSF’s proposed program administration budget exceeds the 10% cap. CleanPowerSF requests its exceedance be approved to facilitate CleanPowerSF’s compliance with the program requirements.

¹² Resolution E-4999, p. 67 (OP No. 2).

2. CleanPowerSF's 2024 CSGT Budget

CleanPowerSF does not anticipate offering the CSGT program in 2024 because CleanPowerSF did not receive any CSGT bids in response to its first DAC programs solicitation. While CleanPowerSF will not have an operating CSGT program in 2024, there will still be program related expenses, such as those associated with continued efforts to procure a CSGT resource, conducting project sponsor outreach, and maintaining regulatory compliance for the program. As noted in Resolution E-5125, without generation and bill discount costs the program administration and ME&O line items automatically exceed their respective cost caps.¹³ The proposed 2024 CSGT budget exceeds the program administration and ME&O caps, representing 59% and 41% of the total budget respectively. The program administration and ME&O budget cap exceedances are needed to support a future CSGT program launch and to comply with program requirements set by the Commission. CleanPowerSF therefore requests the Commission approve the CSGT budget as proposed for the 2024 program year.

Table 4. CleanPowerSF CSGT Budget

	Total	% of Budget
Generation Cost Delta	\$ -	0%
20% Bill Discount	\$ -	0%
Program Administration	\$ 47,887	59%
ME&O	\$ 33,081	41%
Total	\$ 80,968	100%

3. CleanPowerSF's 2024 ME&O plan

As is discussed in further detail in Appendix C, CleanPowerSF's ME&O plan consists of a culturally competent and multilingual approach to increase awareness of and enrollment in DAC-GT as well as other discounts and incentives available to low-income customers. CleanPowerSF requests the Commission approve its ME&O plan for the program year.

Effective Date

Pursuant to General Order 96-B, General Rule 7.3.4 and Energy Industry Rule 5.3, this Tier 2 Advice Letter will become effective after 30 days, on May 3, 2023, or after staff approval.

¹³ Resolution E-5125, p. 10 (Findings and Conclusion No. 12).

Tier Designation

This Advice Letter has a Tier 2 designation pursuant to OP 3 of Resolution E-5125.¹⁴

Confidential Information

Certain information in Appendix B is kept confidential pursuant to the “Declaration of Michael A. Hyams in support of Confidential Treatment of Data and Information Contained in Appendix B of CleanPowerSF Advice Letter 26-E: CleanPowerSF Disadvantaged Communities Green Tariff and CleanPowerSF Community Solar Green Tariff Bill Discount and Generation Cost Delta Workpapers for Program Year 2024” submitted concurrently.

Protests

Anyone wishing to protest this Advice Letter may do so by sending a letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than twenty (20) days after the date of this filing, April 23, 2023. Protests should be submitted to:

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

Copies of protests should also be mailed to the attention of the Director, Energy Division, Room 4004 at the same address above.

The protest should also be sent to CleanPowerSF on the same date it is submitted to the California Public Utilities Commission:

Cheryl Taylor
Operations Manager, CleanPowerSF
San Francisco Public Utilities Commission
525 Golden Gate Avenue, 7th Floor
San Francisco, CA 94102
Email: ctaylor@sfwater.org
Facsimile: 415-934-3982

¹⁴ Resolution E-5125, p. 11 (OP No. 3).

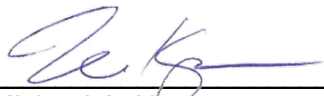
Notice

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

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

Conclusion

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



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

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

APPENDIX A – AL 26E

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



San Francisco
Water
Power
Sewer

Services of the San Francisco
Public Utilities Commission

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

CleanPowerSF

I. Purpose

Pursuant to Ordering Paragraph 17 of California Public Utilities Commission (“CPUC”) Decision 18-06-027, *Alternate Decision Adopting Alternatives to Promote Solar Distributed Generation in Disadvantaged Communities*, and guidance provided in CPUC Resolution E-4999 and E-5124, CleanPowerSF hereby submits this budget forecast for its Disadvantaged Communities Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT) programs for Program Year 2024 and actual costs for Program Year 2022.

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

II. Background

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

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

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

- Existing capacity at previous program year’s (PY) close;
- Forecasted capacity for procurement in the upcoming PY;

¹ Resolution E-4999 establishes that above market generation costs should include net renewable resource costs in excess of the otherwise applicable class average generation rate that will be used to calculate the customers’ bills. In conversations with the CPUC’s Energy Division after the release of the Resolution, it was clarified that this budget line item is intended to cover both a potential higher, as well as lower cost of the DAC-GT/CSGT resources than the otherwise applicable class average generation rate. Hence, the term is updated to state the “Delta of generation costs between the DAC-GT/CSGT resources and the otherwise applicable class average generation rate.”

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

Confidential Appendix B contains the following information:

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

For the reasons set forth in the attached *Declaration of Michael A. Hyams in Support of Confidential Treatment of Data and Information Contained in CleanPowerSF's Advice Letter 26-E, Appendix B*, these two calculations are confidential and not included in the public Advice Letter filing.

III. Budget Forecast for Program Year 2024

For program year 2024 CleanPowerSF requests a total budget of \$887,509 for its DAC-GT and CSGT programs. A detailed budget forecast for each program and PY by budget line item can be found in Table 1 below:

Table 1 CleanPowerSF 2024 Budget Forecast

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

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

a. Generation Cost Delta

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

b. Bill Discount

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

c. Program Administration Costs

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

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

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

² Resolution E-5124 at p. 12.

IV. Budget Caps

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

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

Table 2 Program Administration and ME&O Budget Percentages

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

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

CleanPowerSF does not expect that a fully automated billing solution between PG&E and its billing provider will be in place during 2024. Instead, staff will need to manually transmit discount related data and perform quality control checks to ensure customers are receiving their bill discounts as expected. Using data provided from programs currently in operation, CleanPowerSF has budgeted additional time for these manual processes that have resulted in higher Program Administration costs. Additionally, there are fixed fees associated with program regulatory compliance, such as Green-e® registration that do not scale with the size of the program. They represent a much larger proportion of a smaller program’s budget. As a result of these factors, CleanPowerSF’s proposed Program Administration budget exceeds the Resolution E-4999 10% cap.

CleanPowerSF did not receive any CSGT bids in response to its first DAC programs solicitation. CleanPowerSF anticipates issuing another solicitation for the CSGT program during 2023 with the goal of procuring resources that can come on-line by the end of 2025. Notwithstanding, there will be program related expenses, such as those associated with continued efforts to procure a CSGT resource, conducting project sponsor outreach, and maintaining regulatory compliance for the program during 2024. As noted in Resolution E-5125, without generation and bill discount costs, the program administration and ME&O line items automatically exceed the cost caps.⁵ The budget cap exceedance is needed to support CleanPowerSF’s CSGT procurement and program launch and to comply with program requirements set by the Commission.

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

⁴ Resolution E-5125 at p. 2.

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

V. Budget Reconciliation for Program Year 2022

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

Table 3 Forecast-to-Actual PY 2022 Expenses

Category	DAC-GT			CSGT		
	Forecast	Actual	True-Up	Forecast	Actual	True-Up
Generation Cost Delta	\$ 527,955	\$ 4,196	\$ (523,759)	\$ -	\$ -	\$ -
Bill Discount	\$ 160,227	\$ 10,313	\$ (149,915)	\$ -	\$ -	\$ -
Program Administration						
Program Management	\$ 63,916	\$ 20,174	\$ (43,742)	\$ 51,650	\$ 3,161	\$ (48,488)
PG&E CCA Integration Costs	\$ 31,014	\$ 3,941	\$ (27,073)	\$ 1,263	\$ -	\$ (1,263)
Information Technology	\$ 8,844	\$ -	\$ (8,844)	\$ 16,915	\$ -	\$ (16,915)
Billing Operations	\$ 41,692	\$ 1,240	\$ (40,452)	\$ 2,217	\$ 108	\$ (2,109)
Regulatory Compliance	\$ 4,994	\$ 27,653	\$ 22,659	\$ 3,346	\$ 7,866	\$ 4,520
Procurement	\$ 33,721	\$ 48,188	\$ 14,467	\$ 35,666	\$ 9,093	\$ (26,574)
Program Administration Total	\$ 184,181	\$ 101,196	\$ (82,985)	\$ 111,058	\$ 20,228	\$ (90,830)
Marketing, Education, and Outreach	\$ 95,795	\$ 6,177	\$ (89,618)	\$ 37,081	\$ 611	\$ (36,470)
Program Total	\$ 968,158	\$ 121,881	\$ (846,277)	\$ 148,139	\$ 20,839	\$ (127,300)
2022 Program Year Forecasted Total						\$ 1,116,297
2022 Program Year Actual Totals						\$ 142,720
2022 Program Year True Up						\$ (973,577)

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

VI. Program Year 2024 Budget Request

After applying the budget reconciliation from the previous section to the proposed budget discussion in Section III., CleanPowerSF requests approval for an incremental PY 2024 total of (\$39,736) for DAC-GT and (\$46,332) for CSGT.

Table 4 CleanPowerSF PY 2024 Budget Request

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

VII. Program Capacity and Enrollment Caps

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

Table 5 DAC Green Tariff Capacity and Enrollment Forecasts

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

Table 6 Community Solar Green Tariff Capacity and Enrollment Forecasts

	2024
Estimated Capacity to be Procured	0
Estimated Customer Enrollment	0

VIII. Cost Recovery and Transfer Procedures

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

IX. Conclusion

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

APPENDIX B – AL 26E

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

PUBLIC VERSION



Services of the San Francisco
Public Utilities Commission



CleanPowerSF DAC-GT & CS-GT Budget

PY 2024

1. Budget Forecast PY 2024

Category	DAC-GT	CSGT
	2024	2024
Generation Cost Delta	\$ 400,259	\$ -
Bill Discount	\$ 254,168	\$ -
Program Administration		
Program Management	\$ 72,097	\$ 27,970
PG&E CCA Integration Costs	\$ 5,000	\$ -
Information Technology	\$ -	\$ -
Billing Operations	\$ 7,419	\$ -
Regulatory Compliance	\$ 5,386	\$ 1,630
Procurement	\$ 30,131	\$ 18,287
Program Administration Total	\$ 120,033	\$ 47,887
Marketing, Education, and Outreach	\$ 33,081	\$ 33,081
Program Total	\$ 807,541	\$ 80,968
2024 Program Year Total	\$	888,509

2. 2022 Budget Reconciliation

Category	DAC-GT			CSGT		
	Forecast	Actual	True-Up	Forecast	Actual	True-Up
Generation Cost Delta	\$ 527,955	\$ 4,196	\$ (523,759)	\$ -	\$ -	\$ -
Bill Discount	\$ 160,227	\$ 10,313	\$ (149,915)	\$ -	\$ -	\$ -
Program Administration						
Program Management	\$ 63,916	\$ 20,174	\$ (43,742)	\$ 76,421	\$ 3,161	\$ (73,260)
PG&E CCA Integration Costs	\$ 31,014	\$ 3,941	\$ (27,073)	\$ 31,014	\$ -	\$ (31,014)
Information Technology	\$ 8,844	\$ -	\$ (8,844)	\$ 8,844	\$ -	\$ (8,844)
Billing Operations	\$ 41,692	\$ 1,240	\$ (40,452)	\$ 8,803	\$ 108	\$ (8,695)
Regulatory Compliance	\$ 4,994	\$ 27,653	\$ 22,659	\$ 1,274	\$ 7,866	\$ 6,592
Procurement	\$ 33,721	\$ 48,188	\$ 14,467	\$ 17,874	\$ 9,093	\$ (8,782)
Program Administration Total	\$ 184,181	\$ 101,196	\$ (82,985)	\$ 144,230	\$ 20,228	\$ (124,002)
Marketing, Education, and Outreach	\$ 95,795	\$ 6,177	\$ (89,618)	\$ 35,033	\$ 611	\$ (34,422)
Program Total	\$ 968,158	\$ 121,881	\$ (846,277)	\$ 179,262	\$ 20,839	\$ (158,423)
2022 Program Year Forecasted Total	\$					1,147,420
2022 Program Year Actual Totals	\$					142,720
2022 Program Year True Up	\$					(1,004,701)

3. Program Capacity and Procurement Summary PY 2022

Existing Capacity

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

Planned Capacity

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

*Interim resource

APPENDIX C – AL 26E

Marketing, Education and Outreach Plan for CleanPowerSF



Services of the San Francisco
Public Utilities Commission



I. Purpose and Goals

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

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

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

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

To meet these goals, CleanPowerSF will develop a targeted customer engagement campaign that leverages community-based marketing best practices such as:

- A mix of multilingual and culturally competent communications including newsletters, social media, email and direct mail; and
- Direct customer outreach and partnerships with community-based organizations (CBOs) and local government agencies.

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

II. Guiding Principles

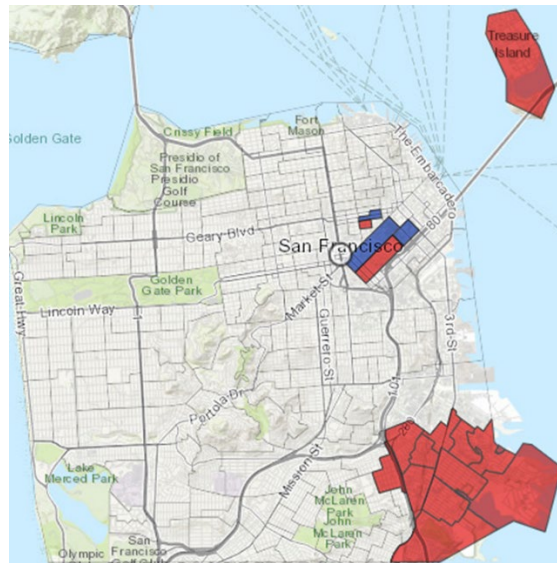
CleanPowerSF is committed to developing culturally appropriate communication strategies to ensure that stakeholders can participate in decisions and actions that impact their communities.

As such, CleanPowerSF commits to the following guiding principles throughout the ME&O engagement process for the DAC-GT and CSGT programs. CleanPowerSF aims to:

- Achieve diverse and meaningful engagement that reflects the demographics of San Francisco DAC communities to ensure equitable outreach across race, income, ability, language preferences, and age;
- Maintain transparency and accessibility of information by bringing the information directly to customers in their neighborhood, in their community, or interest space to better engage them in the process; and
- Build a collaborative process with community partners to ensure barriers to participation are overcome and benefits to participation are maximized in ME&O activities.

III. Target Audiences

In accordance with the DAC-GT and CSGT program eligibility criteria, the primary target audience is CleanPowerSF customers who are low-income (eligible for CARE/FERA) and live in DACs. Based on CalEnviroScreen 3.0 and 4.0, CleanPowerSF's service territory includes 17 DAC census tracts with an estimated 8,700 eligible residential CleanPowerSF customer accounts.¹



The following are the specific census tracts in ascending CalEnviroScreen 3.0 and 4.0 order:

- 6075012301
- 6075012502
- 6075017601

¹ Customers living in the census tract on Treasure Island are entirely served by Hetch Hetchy Power, San Francisco's municipal electric utility.

- 6075017801
- 6075017802
- 6075017902
- 6075023001
- 6075023003
- 6075023102
- 6075023103
- 6075023200
- 6075023300
- 6075023400
- 6075025702
- 6075061000
- 6075061200
- 6075980600

IV. Outreach and Engagement

To meet our ME&O goals, CleanPowerSF will conduct outreach and engagement that includes a targeted, multilingual, and culturally competent approach that addresses the specific needs of DAC communities in San Francisco. In addition to the tactics listed below, staff may explore auto-enrollment approaches of qualifying customers as well.

a. **Marketing and Communications**

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

CleanPowerSF will utilize targeted email marketing and direct mail, the latter of which has proven effective for enrollment in customer programs.

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

b. **Grassroots Outreach**

CleanPowerSF will conduct grassroots outreach to engage directly with residents at community events, which will become increasingly important tactic post-COVID.

Staff will also continue specific outreach efforts made in 2023 and 2024 to eligible CleanPowerSF customers living in affordable housing properties in DACs. Staff conducted Town Halls and held office hours at these sites to enroll customers in the DAC-GT program. CleanPowerSF provided food, and translation and interpretation services.

c. **Partnerships with CBOs**

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

CleanPowerSF had solicited CBO participation for CleanPowerSF's DAC-GT and CSGT program outreach through the PUC.PRO.0218 request for proposals (RFP). Unfortunately, no proposals were submitted, and the solicitation was closed. However, staff are in the process of working on a new request for proposals via PUC.PRO.0266. This contract will award four-year contracts to up to four CBOs. Winning CBOs will enroll qualifying residents into the CleanPowerSF DAC as well as engage with their community members on the CARE and FERA discount programs, general information on clean energy benefits, and other tasks. This contract should be available during 2024.

While CleanPowerSF does not expect to offer the CSGT program in 2024, outreach and education work will need to be conducted to lay the groundwork for a successful program launch. CleanPowerSF plans to leverage the CBO contracts awarded through its PRO.0266 RFP to increase awareness of discount programs available to customers, including CARE, FERA, and the DAC programs. It is CleanPowerSF's expectation that improving awareness of these discount programs will increase enrollment. The benefits of increased CARE/FERA enrollment are twofold: 1) Customers who are eligible for bill discounts under CARE/FERA will receive them even before CSGT program launch and 2) There will be larger pool of income-eligible customers to conduct CSGT outreach to when CleanPowerSF is ready to enroll customers. This will facilitate meeting the 50% low-income threshold required by the CPUC for a CSGT project.

V. ME&O Evaluation

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

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

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

VI. ME&O Budget

CleanPowerSF's total ME&O budget proposal for PY 2024 is \$66,162. Table 1 below includes a summary of the budget by cost category. This plan and budget will be presented in CleanPowerSF's DAC-GT and CSGT annual budget advice letter filing.

Table 1: CleanPowerSF's Proposed ME&O Budget for PY 2024

Item	2024	
	DAC-GT	CSGT
General Marketing	\$2,500	\$2,500
Targeted Marketing	\$2,500	\$2,500
CBO Engagement	\$10,000	\$10,000
Staff Time	\$18,081	\$18,081
Subtotal	\$33,081	\$33,081
Total		\$66,162