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Regulatory Affairs
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San Diego, CA 92123

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Julia Gordin

August 18, 2020

ADVICE LETTER 3412-E-A
(U902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: PARTIAL SUPPLEMENTAL - SAN DIEGO GAS & ELECTRIC UPDATED PROGRAM BUDGET ESTIMATES AND MARKETING EDUCATION AND OUTREACH PLANS IN REGARD TO DISADVANTAGED COMMUNITIES GREEN TARIFF AND COMMUNITY SOLAR GREEN TARIFF PURSUANT TO RESOLUTION E-4999

San Diego Gas & Electric Company (SDG&E) hereby submits this advice letter for approval to the California Public Utilities Commission (Commission) pursuant to Ordering Paragraph (OP) 5 of Resolution E-4999 (E-4999) issued on June 3, 2019.

PURPOSE

This partial supplemental advice letter submittal is pursuant to OP 5 which directs SDG&E to submit updated program budget estimates for the Disadvantaged Communities Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT) programs. At the direction of Energy Division, SDG&E is providing an updated budget to what was previously submitted on August 2, 2019 in Advice Letter (AL) 3412-E. The budget update filed in this Advice Letter reflects the most recent program implementation schedule as shown in AL 3501-E.

BACKGROUND

Assembly Bill (AB) 327 directed the Commission to develop specific alternatives designed to increase adoption of renewable generation in disadvantaged communities (DACs). Pursuant to this mandate, Decision (D.)18-06-027 was issued on June 22, 2018 creating new programs that specifically target DACs, modeled after existing programs which have successfully increased access to renewable generation. Pursuant to D.18-06-027, SDG&E filed AL 3362-E-A on August 24, 2018 adopting two new tariffs – DAC-GT and CSGT.

On October 18, 2018, the Commission issued D.18-10-007 which made corrections and clarifications to D.18-06-027. On January 24, 2019, SDG&E submitted AL 3262-E-B which included a mechanism to withhold the initial Energy Delivery date until subscriber requirements were met. AL 3262-E-B also included adjustments to the anticipated timeline and funding levels for billing system changes which have been updated based on the unforeseen delay in the importation of DAC-GT and CSGT.

Date removed from posting 9/19/2020

On June 3, 2019, the Commission issued Resolution E-4999 which approved AL 3262-E / E-A / E-B with modifications.

On August 2, 2019 in response to Resolution E-4999 SDG&E submitted DAC GT & CSGT budget estimates in AL 3412-E, which included the earliest possible program implementation schedule at the time of filing. On January 31st, 2020 in response to Resolution E-4999 SDG&E submitted AL 3501-E¹ which included a 2021 budget estimate for DAC GT & CSGT, as well as a revised 2020 budget estimate based on an updated program implementation schedule.

DISCUSSION

In accordance with Resolution E-4999 Ordering Paragraph 5, SDG&E has updated the 2019 & 2020 budget estimates for the DAC-GT & CSGT programs. Revised budget estimates are found in the table below,².

DAC-GT Budget Estimates 2019 & 2020

Administration	2019	2020	Subtotal	Funding Approved in 2019 ERRA Forecast Filing	Funding Approved in 2020 ERRA Forecast Filing
Program Management	\$0	\$143,000	\$143,000		
IT ³	\$0	\$225,000	\$225,000		
Above Market Generation Costs	\$0	\$0	\$0		
Customer Discount	\$0	\$0	\$0		
Marketing	\$0	\$16,269	\$16,269		
Manual Billing ⁴	\$0	\$0	\$0		
Evaluation	\$12,000	\$12,000	\$24,000		
Total	\$12,000	\$396,269	\$408,269	\$2,113,700	\$866,297

¹ AL 3501-E: 2021 DAC GT & CSGT budget forecasts.

² Attachment A: DAC-GT & CSGT 2019-2020 Budget Estimate Workpapers.

³ 2019 – 2020 IT estimates for DAC-GT only include work for the verification & enrollment system. No additional billing system estimates are included in this budget.

⁴ Due to the timing of projects coming online for these programs, limited Manual billing operations may be necessary in 2020. If required, the cost estimate is roughly \$1,500,000 / year for every 100 accounts that require manual billing.

CSGT Budget Estimates 2019 & 2020

Administration	2019	2020	Subtotal	Funding Approved in 2019 ERRAs Forecast Filing	Funding Approved in 2020 ERRAs Forecast Filing
Program Management	\$0	\$57,000	\$57,000		
IT ⁵	\$0	\$262,500	\$262,500		
Above Market Generation Costs	\$0	\$0	\$0		
Customer Discount	\$0	\$0	\$0		
Marketing	\$0	\$5,000	\$5,000		
Manual Billing ⁶	\$0	\$0	\$0		
Evaluation	\$12,000	\$12,000	\$24,000		
Total	\$12,000	\$336,500	\$348,500	\$390,500	\$1,242,248

EFFECTIVE DATE

SDG&E believes this submittal is subject to Energy Division disposition and should be classified as a Tier 2 (effective after staff approval) submittal pursuant to GO 96-B. Pursuant to Energy Division, SDG&E maintains the original effective date of September 3, 2019.

⁵ 2019 – 2020 IT estimates for CSGT only include work for the verification & enrollment system. No additional billing system estimates are included in this budget.

⁶ Due to the timing of projects coming online for these programs, limited Manual billing operations may be necessary in 2020. If required, the cost estimate is roughly \$1,500,000 / year for every 100 accounts that require manual billing.

PROTEST

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received no later than September 8, 2020 which is 21 days after the date this Advice Letter was submitted with the Commission. There is no restriction on who may submit a protest. The address for mailing or delivering a protest to the Commission is:

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

Copies of the protest should also be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov and to SDGETariffs@SDGE.com. A copy of the protest should also be sent via e-mail to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Greg Anderson
Regulatory Tariff Manager
E-mail: GAnderson@SDGE.com

NOTICE

A copy of this submittal has been served on the utilities and interested parties shown on the attached list, including interested parties in R.14-07-002 and R.15-03-010, by providing them a copy hereof either electronically or via the U.S. mail, properly stamped and addressed.

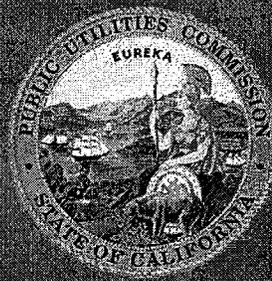
Address changes should be directed to SDG&E Tariffs by email to SDGETariffs@SDGE.com.

/s/ Clay Faber

CLAY FABER
Director – Regulatory Affairs

ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: San Diego Gas & Electric (U902-E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Toff Morales

Phone #: 858-650-4098

E-mail: TMorales@SDGE.com

E-mail Disposition Notice to: SDG&ETariffs@SDGE.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 3412-E-A

Tier Designation: 2

Subject of AL: Partial Supplemental - San Diego Gas & Electric Updated Program Budget Estimates and Marketing Education and Outreach Plans in Regard to Disadvantaged Communities Green Tariff and Community Solar Green Tariff Pursuant to Resolution E-4999

Keywords (choose from CPUC listing): Tariffs

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: E-4999

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: Supplemental - 3412-E

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

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: 9/3/19

No. of tariff sheets: N/A

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: N/A

Pending advice letters that revise the same tariff sheets: N/A

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

Name: Greg Anderson
Title:
Utility Name: San Diego Gas & Electric
Address: 8330 Century Park Court, CP32C
City: San Diego
State: California Zip: 92123
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: GAnderson@SDGE.com

Name: SDG&E Regulatory Tariffs
Title:
Utility Name: San Diego Gas & Electric
Address: 8330 Century Park Court, CP32C
City: San Diego
State: District of Columbia Zip: 92123
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: SDGETariffs@Sdge.com

Clear Form

General Order No. 96-B
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

Public Utilities Commission

Office of Ratepayer Advocates (ORA)

R. Pocta

Energy Division

M. Ghadessi

M. Salinas

L. Tan

R. Ciupagea

Tariff Unit

CA Energy Commission

B. Penning

B. Helft

Advantage Energy

C. Farrell

Alcantar & Kahl LLP

M. Cade

K. Harteloo

AT&T

Regulatory

Barkovich & Yap, Inc.

B. Barkovich

Braun & Blaising, P.C.

S. Blaising

D. Griffiths

CA Dept. of General Services

H. Nanjo

California Energy Markets

General

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

City of Poway

Poway City Hall

City of San Diego

F. Ortlieb

B. Henry

L. Azar

Y. Lu

Clean Power Research

T. Schmid

G. Novotny

Davis Wright Tremaine LLP

J. Pau

Douglass & Liddell

D. Douglass

D. Liddell

Ellison Schneider Harris & Donlan LLP

E. Janssen

C. Kappel

Energy Policy Initiatives Center (USD)

S. Anders

Energy Regulatory Solutions Consultants

L. Medina

Energy Strategies, Inc.

K. Campbell

EQ Research

General

Goodin, MacBride, Squeri, & Day LLP

B. Cragg

J. Squeri

Green Charge

K. Lucas

Hanna and Morton LLP

N. Pedersen

JBS Energy

J. Nahigian

Keyes & Fox, LLP

B. Elder

Manatt, Phelps & Phillips LLP

D. Huard

R. Keen

McKenna, Long & Aldridge LLP

J. Leslie

Morrison & Foerster LLP

P. Hanschen

MRW & Associates LLC

General

NLine Energy

M. Swindle

NRG Energy

D. Fellman

Pacific Gas & Electric Co.

M. Lawson

M. Huffman

Tariff Unit

RTO Advisors

S. Mara

SCD Energy Solutions

P. Muller

Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

C. Frank

SPURR

M. Rochman

Southern California Edison Co.

K. Gansecki

TerraVerde Renewable Partners LLC

F. Lee

TURN

M. Hawiger

UCAN

D. Kelly

US Dept. of the Navy

K. Davoodi

US General Services Administration

D. Bogni

Valley Center Municipal Water Distr

G. Broomell

Western Manufactured Housing

Communities Association

S. Dey

Interested Parties in

R.14-07-002

R.15-03-010

