SOUTHERN CALIFORNIA EDISON
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August 29, 2024

ADVICE 5361-E
(Southern California Edison Company - U 338-E)

ADVICE 7361-E
(Pacific Gas and Electric Company - U 39-E)

ADVICE 4497-E
(San Diego Gas and Electric Company - U 902-E)

ADVICE 51-E
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(San Jose Clean Energy)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

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SUBJECT: Joint Submittal Outlining Workshop Results and Process Improvements Pursuant to Ordering Paragraph 8 of Decision 24-05-065.

PURPOSE

In accordance with Ordering Paragraph (OP) 8 of Decision (D.) 24-05-065 (the Decision), Southern California Edison Company (SCE) submits this advice letter on behalf of itself, Pacific Gas and Electric Company (PG&E), and San Diego Gas & Electric Company (SDG&E) (together, the Investor-Owned Utilities (IOUs)) and Clean Power Alliance of Southern California (CPA), CleanPowerSF, CalChoice,[1] Ava Community Energy (Ava), Marin Clean Energy (MCE), Peninsula Clean Energy Authority (PCE), San Jose Clean Energy (SJCE) and San Diego Community Power (SDCP) (together, the participating CCAs) to provide workshop results and propose the format and specific data to be included in the California Distributed Generation Statistics (DGStats) reporting website.

BACKGROUND

On May 31, 2022, the IOUs each filed an application for review of their Disadvantaged Community – Green Tariff (DAC-GT), Community Solar Green Tariff (CSGT), and Green Tariff Shared Renewables (GTSR) programs pursuant to D.18-06-027 and D.21-12-036. These applications were consolidated into one proceeding. The Administrative Law Judge (ALJ) issued a Scoping Memo and Ruling on December 2, 2022, which established the scope and schedule for the proceeding including providing the opportunity for stakeholders to propose modifications to existing tariffs or establishing a new tariff or program, if doing so would be beneficial to ratepayers.

On May 30, 2024, the California Public Utilities Commission (CPUC or Commission) adopted the Decision modifying and streamlining existing Green Access Programs (GAP) and adopting a Community Renewable Energy (CRE) Program, pursuant to Assembly Bill (AB) 2316 (Ward, Stats. 2022) and Pub. Util. Code Section 769.3.

On July 19, 2024, the IOUs and participating Community Choice Aggregators (CCA) facilitated a workshop with Energy Division (ED) and relevant stakeholders to determine the format and specific data to be included in the California Distributed Generation Statistics (DGStats) website reporting pursuant to Decision OP 7.

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1 CalChoice acts as program administrator for Lancaster Choice Energy (LCE), Pico Rivera Innovative Municipal Energy (PRIME), and San Jacinto Power (SJP).

Pursuant to Decision OP 8, within 45 days after facilitating the workshop, noted above, the IOUs and participating CCAs submit this joint Tier 1 Advice Letter outlining the agreed upon data reporting and any efforts planned to better coordinate amongst the various Program Administrators (PAs) and to automate the data collection and transfer process.

DISCUSSION

Overview of DGStats

The Commission ordered the creation of the California Solar Statistics website in 2006 to serve as the official public reporting site for the California Solar Initiative (CSI).[2] In 2015, recognizing the benefits of hosting distributed generation data beyond CSI and Net Energy Metering solar statistics, ED worked with the IOUs to create the new DGStats website and to transfer data from California Solar Statistics to DGStats. Further Commission decisions and ED guidance directed the IOUs to begin publishing to DGStats project-level data from the Self-Generation Incentive Program (SGIP), Solar on Multifamily Affordable Housing (SOMAH) Program, and New Solar Homes Partnership (NSHP).[3] In October 2019, the Commission adopted Resolution E-5030 authorizing ED to oversee contracts for work required to maintain and expand the DGStats website. ED is authorized to define future scopes of work, manage contract deliverables, and set funding levels for the site.[4]

Workshop Summary and Green Access Programs Reporting Overview

As referenced above, the PAs facilitated a workshop on July 19, 2024 (the July Workshop) to determine the format and specific public, non-confidential data to be included in the DGStats website reporting, including specific metrics identified in OP 6 of the Decision.[5] At the workshop, SCE, the singular PA for the discontinued ECR program and CPA the singular PA for the discontinued CSGT program proposed that although not required by the Decision, metrics for both of these closed programs should be reported on the DGStats website for completeness. There were no objections from ED or other stakeholders.

The following discussion proposes metrics to be included in future DGStats reporting for all of the Green Access Programs (GAP), which include the modified DAC-GT and

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2 D.06-01-024, Interim Order Adopting Policies and Funding for the California Solar Initiative, R.04-03-017 (Jan. 17, 2006).

3 D.17-12-022, Decision Adopting Implementation Framework for Assembly Bill 693 and Creating the Solar on Multifamily Affordable Housing Program, R.14-07-002 (Dec. 18, 2017)

4 R. E-5030, Authorizing Energy Division to Oversee Contracts for Work Required to Maintain and Expand the California Distributed Generation Statistics Website (October 24, 2019)

5 *Id.* at 173 (OP 7).

CSGT programs, the modified GT and ECR programs, and the CRE Program. The cadence in which metrics should be reported after the DGStats website is updated and live, in addition to plans for interim period reporting prior to the transition to the updated DGStats website are also addressed.

As discussed in the July Workshop, specific metrics under consideration include those directed by OP 6 of the Decision, metrics currently reported to the Commission in existing program-related reports, and additional metrics suggested by ED or the PAs.

Given the similarities between programs, the PAs present metrics, reporting cadences, interim reporting, and other concepts which are applicable to all programs in the "Green Access Programs Reporting" section below and provide more detail about each program, its current metrics, and any specific program reporting needs in the "Program Reporting Specifics" section.

Through workshop discussions and further conversation after the workshop, the PAs reached alignment on GAP reporting on the DGStats website. However, all PAs and ED acknowledged that more in depth discussions will need to occur to build out a successful reporting platform for each program on DGStats. These discussions with the DG Stats website vendor, ED and participating PAs are likely to lead to further refinement and/or potential additions, reductions, or changes to reporting metrics. Therefore, the information presented below should be treated only as an initial foundation for future discussions with the vendor and ED, and not as a final design document nor as a scope of work.

Green Access Programs Reporting

In Appendix A-2, the PAs have included a matrix that shows PA by GAP to understand which PA will be reporting on which GAP on the DGStats website.

The PAs propose that GAP data provided to the DGStats vendor by each load serving entity (LSE) be LSE-specific. This will allow the data to be presented on the DGStats website either by LSE, aggregated for the purposes of reporting statewide figures, or through another level of aggregation as determined by the vendor, ED, and reporting PAs in future implementation discussions.

Metrics vs. Fields

Two tables are presented in Appendix A-1: one that lists GAP metrics and one that lists GAP fields. The "Metrics" table presents metrics that are agreed upon as prime candidates for reporting on the DGStats website by program. The PAs define a metric as a measure of quantitative assessment used to track performance of a program.

The PAs further agree that all metrics displayed on the DG Stats website should be presented at the "program" level, as opposed to the "project" level. To illustrate the difference between a program and a project, we can consider that one program such as

DAC-GT will consist of multiple projects. A project is a single contract for the installation of renewable resources by a developer to support a program. Given this hierarchical and one to many relationship between a program and projects, the PAs agree that displaying metrics at the program level provides the correct amount of granularity, while still allowing the end user to aggregate that programmatic data in various ways (i.e., by LSE, service territory, zip code, etc.). To further illustrate the relationship between a program and a project, we can look at how the PAs intend to measure program capacity. Program capacity is a metric that would consist of the sum of each projects' capacity dedicated to a given program, such as DAC-GT. However, only the program level total would be displayed, not the individual project MWs that make up the total.

Naturally, metrics from one program should not be compared to metrics from another program.

The PAs core programmatic metrics fall into five broad categories as shown below:

1. Cost
2. Capacity
3. Subscriber
4. Projects
5. RECs

In addition to programmatic reporting, the CSGT program is the one program that intends to display "project" level information on the DG Stats website. Due to the fact that there are only four total projects in the CSGT program, providing "project" level information is digestible and adds value. These differences for the CSGT program will be detailed in the "Program Reporting Specifics" section under "CSGT Reporting."

In contrast to "metrics", a "field" is defined as a data element that refers to an attribute or property about the entity (i.e., program, project, customer etc.) in question. In some cases, fields may need to be provided to the vendor to help display a metric in a meaningful way. In other cases, the metric itself is the value in a field.

In the "Fields" table shown in Appendix A-1, the PAs present fields as a building block that can be leveraged in initial discussions with the vendor and to ensure all required information is captured appropriately (i.e., project level information). For simplicity, fields are given the same five categories referenced above, with the addition of community, technology, and location. However, sometimes these categories relate to a project instead of a program, as opposed to "Metrics" which all relate to a program. The PAs understand that future discussions with the vendor will be necessary to ensure the data (fields) are transferred to the vendor in the correct format and at the correct level of granularity for successful reporting and that ensures data confidentiality.

The PAs propose that the following metrics be included for the DAC-GT, CSGT, modified GT, ECR, and CRE programs on the DGStats website in accordance with the

Decision. Additional information, including the specific definition for each category discussed below is included in Appendix A-1.

Programmatic Information – Cost

During the July Workshop, Energy Division staff recommended that the DGStats reporting include annual program costs. The PAs support including this metric on the DGStats website for all programs.

The proposed programmatic cost-related metric for the GAP programs is summarized as the following:

1. Annual program costs

Programmatic Information – Capacity

All parties agreed that program capacity is an important measure for public visibility. Additionally, PAs agreed that in some cases, such as when comparing the program cap in MW to the number of MWs online for a program in a given quarter, "MWs online" is the preferred metric. However, in other cases, such as at the end of the year, once the PAs have access to the total amount of energy a program has generated for the year as well as the corresponding amount of energy program participants have consumed in that year, it can be more valuable to look at capacity in terms of energy (i.e. MWhs). Therefore, the PAs propose collecting and presenting both MWs and MWhs associated with each program on the DG Stats website.

The proposed programmatic capacity-related metrics for the GAP programs are summarized as the following:

1. Program Cap
2. MWs procured
3. MWs online
4. Annual program generation (MWh)
5. Annual Unsubscribed MWh

Programmatic Information – Subscriber

The PAs propose that the "subscriber information" requested in OP 6 of the Decision[6] is represented by the number of enrolled customers and average monthly discounts provided to those customers as applicable.

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[6] *Id.* at 173 (OP 6).

Additionally, during the July Workshop, ED suggested subscriber information include the "number of customers enrolled". PAs determined that the number of customers enrolled should always be reported at the lowest level of granularity available to define a customer (i.e., the electric service agreement level). All PAs agreed they are reporting at the service agreement level in their current reporting and should continue to do so.

Parties at the workshop further acknowledged that different programs may have different needs to segment the number of customers enrolled by different customer characteristics. Different ways to segment the number of customers enrolled could include, but are not limited to, customer class, low-income status, business type, or Title 24 compliance driven enrollments. Parties agreed that further discussions will be needed by all participating PAs within a program to identify the most meaningful ways to segment customers for any given program.

In addition, to provide an overall snapshot of the degree to which the program has been enrolled or subscribed to by customers, the PAs suggest including the number of enrolled customers presented in MW. The creation of this metric typically requires some type of forecast in terms of future customer usage as well as a general capacity factor to apply to the MWs of generation online. PAs agree that the methodology used to arrive at the MWs of customers enrolled as well as any assumed inputs to this calculation should be discussed and agreed upon by the PAs and ED. Any divergences from methodologies among PAs, if at all, should be minimal to ensure comparisons across PAs are valid and appropriate.

OP 6 further contemplates reporting on the coordination with low-income and clean energy programs. With regard to low-income programs, as noted above, where appropriate, (potentially in a program such as the CRE Program), PAs intend to report on the number of customers enrolled in low-income programs, which for most programs would be the total number of enrolled customers by California Alternate Rates for Energy (CARE) and/or Family Electric Rate Assistance (FERA) program status. "Coordination with low-income programs" for programs, like DAC-GT or CSGT, means reporting on the number of new CARE/FERA enrollments in the process of enrolling customers in the program on a quarterly basis[7]. Though this metric remains relevant for CSGT, it is no longer as relevant for DAC-GT, as PAs move to implement auto-enrollment processes[8].

Additionally, it would be difficult for PAs to concisely and uniformly report on coordination with clean energy programs as each PA offers different programs, and "clean energy programs" are not clearly defined in the decision. The PAs, therefore, recommend removing these reporting requirements for inclusion on the DGStats

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7 Resolution E-4999 at 63 (OP 1(f)).
8 D.24-05-065 at 133 ("To be clear, Utilities and participating CCAs shall follow the auto-enrollment practice adopted by the Commission in D.20-07-008 and reiterated in Resolution E-5124.")

website at this time, and instead propose reporting the total number of low-income customers enrolled, where appropriate.

The proposed programmatic subscriber-related metrics for the GAP programs are summarized as the following:

1. Number of customers enrolled
2. Number of low-income customers enrolled
3. MWs Enrolled
4. Average customer monthly discount

Programmatic Information – Projects

The participating CCAs, the joint IOUs, and ED all agree that project level information is important to provide so that certain programmatic metrics can be displayed on the DGStats website. The project-specific related metrics that were discussed at the July Workshop per OP 6 of the Decision are "projects approved" and "projects completed." Again, these would be reported in a summarized manner at the program-level.

It was also proposed that project facility status and location of project would be important fields to collect for help with displaying metrics by various segments. Additionally, the PAs propose providing the following fields to the vendor: 1) project name; and 2) technology type for each project.

The proposed project-related metrics for the GAP programs are summarized as the following:

1. Number of projects procured ("Projects approved" per D.24-05-065)
2. Number of projects online ("Projects completed" per D.24-05-065)

The proposed programmatic project-related fields for the GAP programs are summarized as the following:

1. Project name
2. Project facility status
3. Project capacity
4. Annual project generation
5. Project technology type
6. Project location (city, state, zip code)

Programmatic Information – RECs

The Decision eliminated the Green-e Certification process.[9] In lieu of Green-e Certification, the Decision requires that PAs conduct their own validation and tracking by including the following details in their modified program reporting after the retirement of Renewable Energy Certificates (RECs): megawatt-hours (MWh) of participant usage, MWh of Renewables Portfolio Standard (RPS) RECs retired for participants, and remaining MWh of usage to account for with program RECs.[10] The PAs understand this to mean that RECs retired for participants should be segmented into MWh of RPS RECs retired for participants from interim resources, and MWhs of RECs retired for program participants that are from dedicated programmatic resources. The "MWh of participant usage" should match the total number of MWh of total RECs retired for participants.

These data points are applicable to all programs, except the CRE Program, whose program design is still under consideration by the Commission.

The proposed programmatic REC-related metrics for the GAP programs are summarized as the following:

1. Annual MWh of participant usage
2. Annual MWh of RPS/interim RECs retired for participants
3. Annual MWh of programmatic/dedicated RECs retired for participants

Reporting Cadence

The PAs support reporting program metrics on a quarterly basis as required under OP 6 of the Decision. However, while most metrics can be reported on a quarterly basis, some of the above metrics, including those metrics that were not previously included in program reporting, need to be updated on an annual basis, such as annual program costs. Reporting certain metrics on an annual basis will ensure that PAs can provide the actual data rather than a forecast or estimate. Additionally, PAs retire RECs on an annual basis after participant usage and developer generation has been finalized for the prior calendar year, and therefore PAs propose that metrics related to MWhs of generation and usage (i.e., total MWhs of project generation, MWhs of participant usage, MWhs of dedicated and/or interim RECs retired for participants, and

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9 *Id.* at 172 (OP 3(g)) ("Green-e certification is no longer required. Consistent with Ordering Paragraph 6 below, Quarterly reporting to California Distributed Generation Statistics (DGStats) website, or another website as determined by ED, shall include: megawatt-hours (MWh) of participant usage; MWh of Renewable Portfolio Standard (RPS) Renewable Energy Credits (RECs) retired for participants; and remaining MWh of usage to account for which program RECs.")

10 *Id.*

unsubscribed MWhs) be made on an annual cadence as well, after RECs have been retired.

Lastly, the PAs propose that average monthly customer discount be calculated and reported on an annual basis once actuals from the year have been finalized, and that the average monthly discount be derived from discounts provided every month of the calendar year.

The proposed cadence for updating each reported metric is provided in more detail in Appendix A-1.

Interim Reporting

In the interim period prior to the implementation of reporting on the DGStats website, PAs will continue to file quarterly reports for the GAP programs.[11] This will ensure that program reporting continues without interruption and/or unnecessary confusion. There were two criteria that were established at the July 19 workshop that must be true to begin reporting on the DGStats website:

1. The GAP program in question must be fully designed and have data to provide and;
2. The DGStats website module for the GAP program in question must be live and fully operational.

Once these two requirements are met, the PAs will switch to reporting in the new system to ensure centralized reporting. The IOUs and Participating CCAs do not believe that it would be beneficial to transfer any historical reporting information into the DGStats website. This would be an unnecessary expense.

Efforts to Better Coordinate and Automate the Data Collection and Transfer Process

OP 8 directs the IOUs and participating CCAs to outline "any efforts planned to better coordinate amongst the various Program Administrators and to automate the data collection and transfer process." First, addressing plans to better coordinate, the PAs agree that once a vendor is selected to update the DGStats website, a source of funding is determined, and the GAP programs are fully designed, the PAs for each program will meet to begin discussions with the vendor to initiate website development. The PAs anticipate there may be standing meetings to discuss scope of work, timing for both the buildout of the GAP website modules, and timing related to when the quarterly and annual data will be provided to the vendor and when the updates will be made to the website, etc. Once the website is established, the PAs may also benefit from hosting

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[11] Per D.21-12-036, PG&E is required to file monthly progress reports for its GTSR program. As directed, PG&E will continue the monthly cadence unless a letter from the Executive Director of the Energy Division is received that adjusts the required cadence to quarterly.

optional meetings on a quarterly or semi-annual cadence (at least initially) to ensure that the website is functioning as expected, and to address any issues or discuss any areas for improvements.

Next, given the DGStats vendor for 2025 and beyond is still to be determined, the PAs agreed that it is too early to discuss any level of automation as it relates to the data collection and transfer process. Internal automation has a cost associated with it, and each PA's internal Information Technology systems will operate differently across the various programs. In some instances, and depending on the PA and program, the data collection process may be simple to automate. In other cases, manual reporting may be preferred to provide the data in the needed format for data transfer to the vendor.

Data transfer is different than data collection, and this difference is important when considering automation. Data collection refers to how each LSE collates the data internally, whereas data transfer relates to the process by which the LSE sends the data to the vendor for display on the website. If automation is desired, the automation of data transfer and associated cost and the funding source for this potential expense will need to be discussed upon selection of a vendor for the DGStats website. Building an Application Programming Interface (API) is one way to automate data transfer, though given the associated costs, it may be more beneficial to simply transfer files to the vendor "manually" using Secure File Transfer Protocol (SFTP) each quarter. Any level of automation is likely to substantially increase the funding required to report the metrics. Given the potentially large cost associated with any automation between multiple PAs and a chosen vendor, the PAs request that if this is needed, it be mandated by Commission direction and with an appropriate cost recovery mechanism.

Similarly, PAs request that a budget and funding source for the DGStats work be provided by the Commission. This could be in the form of a Resolution in the DGStats proceeding that would increase the funding for the DGStats website to account for GAP reporting needs and also order the incorporation of community solar statistics into the contract.[12] The PAs put forth this proposal as the most cost-effective and streamlined approach. The participating CCAs will need to determine if one PA should hold the master contract with the vendor for all participating CCAs.

PROGRAM REPORTING SPECIFICS

DAC-GT & CSGT PROGRAMS

Current Reporting Requirements

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[12] IOUs will establish a co-funding agreement ensuring ratepayer indifference between service territories.

The IOUs and the CCAs, as PAs, are subject to the same DAC-GT and CSGT reporting requirements. The PAs have been filing quarterly and semi-annual reports for the DAC-GT and CSGT programs pursuant to Resolution E-4999.

The current reporting requirements are as follows:

DAC-GT/CSGT Quarterly Reports:

- Capacity procured
- Capacity online
- Customers subscribed
- DAC census tract where project is located
- Number of participating customers in each DAC census tract
- Number of customers newly enrolled in CARE/FERA

CSGT Semi-Annual Reports:

- Number of income-qualified customers subscribed to each CSGT project
- Capacity allocated to subscribed customers
- Whether waitlist of non-qualified customers exists; size of waitlist
- Whether Project Sponsor is receiving bill credits from the Project
- Project sponsor's subscription size
- Number of master-metered accounts participating in CSGT
- Total program capacity allocated to master-metered accounts

Proposed Updated Reporting for DAC-GT/CSGT

In light of the Decision, the PAs recommend keeping the existing metrics above when transitioning to DGStats reporting with several exceptions below for the DAC-GT/CSGT programs.

Metrics to Discontinue

The PAs propose to discontinue reporting which DAC census tract the project is located in as the project siting requirements were expanded under the Decision.[13]

PAs currently report on the number of customers in each DAC census tract as part of the DAC-GT/CSGT quarterly reports. The PAs propose that this metric be discontinued

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[13] *See* D.24-05-065 at 170 (OP 3(a)) ("Site requirements are revised to allow eligible projects to be located no more than five miles from eligible disadvantaged communities census tracts.")

in order to streamline reporting as all customers, with the exception of CSGT sponsors, must be residents in a DAC.

The PAs propose to discontinue reporting on capacity allocated to subscribed customers and information on wait-lists of non-qualified customers (verification if a list exists and, if so, the size of each list) as part of the CSGT semi-annual reports. The metric regarding capacity allocated to subscribed customers should be discontinued as it provides redundant information to the program capacity metrics that will be reported in DGStats. The wait-list information should also be discontinued to streamline reporting of useful and timely information.

Proposed Updated CSGT Reporting

While the Decision discontinued future solicitations for the CSGT program, reporting for existing CSGT projects would continue. PAs that have already contracted for CSGT projects or have CSGT procurement in existing active solicitations at the time of issuance for the Decision and plan to continue their CSGT program will report on program metrics and fields in accordance with OP 6 of the Decision.[14]

The PAs propose that the CSGT program reporting in DGStats include all the same metrics and fields as DAC-GT. However, since the CSGT Program has additional requirements and provisions (e.g., Project Sponsors) beyond the modified DAC-GT program, CSGT PAs should report on additional CSGT project and program specific data beyond that reported for DAC-GT. The PAs propose CSGT PAs report on two additional metrics and six additional fields: two regarding programmatic information (reflected in both metrics and fields) and four fields regarding project information.

The PAs also proposes one modification to CSGT reporting not discussed below. The Program—Subscriber metric category should not include Project Sponsor data in the "average customer monthly discount" metric.[15] Other reporting proposals regarding Project Sponsors are addressed below.

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14 PAs who will no longer offer the CSGT program, will no longer report on CSGT following the full transition of their CSGT program to the modified DAC-GT.

15 With respect to calculating an average customer monthly discount for CSGT Reporting, CSGT PAs should not include a Project Sponsor's bill discount (if the Project Sponsor elects to receive one) as a Project Sponsor is eligible to receive up to 25 percent of a CSGT project's output (according to Resolution E-4999, Findings and Conclusions 24). A Project Sponsor's subscription size (and bill discount - if the Project Sponsor elects to receive one) could be significantly larger than residential CSGT subscribers and could skew average bill discount data.

Additional Programmatic Information

PAs operating a CSGT program will report on two additional program metrics that will also be reflected as two additional program fields: the number of master-metered accounts participating in the CSGT program and the total CSGT capacity allocated to those master-metered accounts under the Program-Subscriber field category. The PAs propose reporting on two CSGT-specific program metrics relative to master-metered accounts to better capture all potential CSGT subscribers in DGStats: the number of master-metered accounts participating in the CSGT program, and the total program capacity allocated to those master-metered accounts.

Additional Project Information

PAs operating a CSGT program will report on four additional project fields, two under the Project-Community field category and two under the Project-Subscriber field category. CSGT PAs will report on job training, and local hiring under the Project Community category. Those fields will include the number of workers registered in a State of California approved apprenticeship program and the number of workers whose place of residence is located within a 25- mile radius of the CSGT project, respectively. This information is project-specific and improves visibility into project information if displayed at the project-level.

Under the Project-Subscriber field category, CSGT PAs will report if a Project Sponsor is receiving energy and, if so, the Project Sponsor's subscription size. This information is also project-specific and provides greater visibility into project information if displayed at the project-level.

PAs operating a CSGT program will continue to provide information on the number of income-qualified customers subscribed to each CSGT project.

Modified Green Tariff & ECR Programs

The Decision modified the Green Tariff option and closed the ECR option to all new procurement not currently under negotiation or contract. SCE is the only utility with dedicated ECR projects that is either online, approved or under negotiation.

Current Reporting Requirements

Decision 15-01-051 directed the participating IOUs to submit monthly GTSR program progress reports as well as an annual program progress report. In Resolution E-5028,[16] the Commission streamlined and consolidated GTSR reporting requirements. Specifically, the Commission modified the frequency of its GTSR program reports from monthly to quarterly.[17]

The current reporting requirements are as follows:

Quarterly GTSR Program Progress Reports[18]:

- "Available capacity" data at the most detailed level feasible, updated monthly, and work to increase the precision of the information over time.
- Summary of monthly advisory group activities, or consultation with Community Based Organizations (CBOs), if any.
- ECR Contract Report
- Attach Generation Transfer Report (Reported in Quarter 3)

Annual GTSR Program Progress Reports:

- Enrollment Reporting, including "available capacity" data at the most detailed level feasible.
- One page summary tracking the amount and cost of generation transferred between the RPS and GTSR Program.
- GTSR Revenue and Cost Reporting summary.
- Summary of advisory group or advising network activities, including information regarding frequency of meetings, topics discussed, and any other relevant information.
- CCA Code of Conduct report. If applicable, summarize any marketing or lobbying efforts that are, or could reasonably be interpreted to be, subject to the CCA Code of Conduct.
- Supplier diversity.

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16 Ordering Paragraph 6. The specific reporting requirement changes are described in detail in Attachment C of PG&E Advice Letter 3920-G/5206-E.

17 Per D. 21-12-036, this reduced schedule was rescinded for PG&E only, with additional reporting requirements added; the Executive Director, or designee can inform PG&E when it may revert back to quarterly reporting.

18 Per D. 21-12-036, this reduced schedule was rescinded for PG&E only, with additional reporting requirements added; the Executive Director, or designee can inform PG&E when it may revert back to quarterly reporting.

- Summary of CARE enrollment figures including location; location of CARE customers in relation to areas eligible for Environmental Justice ("EJ") Projects and in relation to planned or existing EJ Projects.
- Reports of fraud or misleading ads
- Enrollment figures for low-income customers and subscribers who speak a language other than English at home
- GTSR 20-year forecast[19]

Inclusion of ECR in DGStats Reporting

As discussed at the July 19 Workshop, despite the closure of the GTSR-ECR to new procurement, SCE will continue reporting program metrics under OP 6 referenced in Appendix A-1 under the ECR program column for projects that are currently online and those that will come online in the future, in line with its current process until DGStats is implemented. This approach ensures a uniform and dependable method across all programs.

Metrics to Discontinue

The PAs propose that both supplier diversity and summary of CARE enrollment figures be discontinued from the annual report. The PAs' current and potential contracts with GT and ECR partners have not counted toward supplier diversity goals, and therefore this metric is not applicable to the programs. Additionally, the CARE customer enrollment metric was created before the existence of DAC-GT/CSGT. Given the modified GT program is focused on providing a 100% renewable energy product for the general market population, the PAs recommend removing the low-income enrollment metric and the number of subscribers who speak a language other than English at home. The measure of program enrollment in these populations is not relevant and is not a measure of success for the modified GT or ECR programs.

The monthly advisory group activities are not included as a "metric" or evaluated for purposes of this advice letter as they are being evaluated as part of A. 22-05-022. They are listed here only for completeness and will not be included as a metric in DGStats.

Additionally, job training and workforce development tracking, although mentioned in the Decision, were never a goal nor a requirement for the GT and ECR Programs. Inclusion of these metrics is therefore unnecessary.

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[19] The GTSR 20-year forecast is not included as a "metric" or evaluated for purposes of this Advice Letter. It is listed here only for completeness.

Last, as the average customer monthly discount is not applicable to the modified GT or ECR programs, the PAs do not intend to display that information on the website.

Community Renewable Energy (CRE) Program

The Decision adopted the foundational elements of a new Community Renewable Energy Program. In June 2024, the Administrative Law Judge issued a ruling seeking additional party comments on programmatic details regarding the implementation of the CRE Program. Parties responded to questions in July of 2024. During the July 19 workshop, participating parties acknowledged that the parameters of the CRE Program are still under development in the proceeding, (A. 22-05-022, and related matters), and should not be discussed outside of vague generalities until program details are finalized.

Nonetheless, the group agreed that the number of MWs procured and participation levels in the CRE Program (by relevant segments) would be important metrics to establish once the program is created. Once a decision that further defines the CRE Program is adopted, the parties will be able to reconvene and discuss appropriate metrics for the program in more detail. Open dialogue between the IOUs, the participating CCAs, and ED will be important to ensure the chosen metrics measure important program objectives. The IOUs and CCAs acknowledged that an additional advice letter can be submitted at a later date to propose CRE Program metrics for incorporation onto the DGStats website.

TIER DESIGNATION

In accordance with OP 8 of this Decision, this advice letter is submitted with a Tier 1 designation.

EFFECTIVE DATE

This advice letter will become effective August 29, 2024, the same date submitted.

NOTICE

Anyone wishing to protest this advice letter may do so only electronically. Protests must be received no later than 20 days after the date of this advice letter. Protests should be submitted to the CPUC Energy Division at:

E-mail: EDTariffUnit@cpuc.ca.gov

In addition, protests and all other correspondence regarding this advice letter should also be sent electronically to the attention of:

For SCE:

Connor Flanigan

Managing Director, State Regulatory Operations
Southern California Edison Company
E-mail: AdviceTariffManager@sce.com

and

Adam Smith
Director, Regulatory Relations
c/o Karyn Gansecki
Southern California Edison Company
E-mail: Karyn.Gansecki@sce.com

For PG&E:

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
E-mail: PGETariffs@pge.com

For SDG&E:

Attn: Greg Anderson
Regulatory Tariff Manager
E-mail: GAnderson@sdge.com and SDGETariffs@sdge.com

For Joint CCAs:

Attn: Brittany Iles
Counsel for Joint CCAs
E-mail: Iles@braunlegal.com

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice filing to the interested parties shown on SCE's GO 96-B and A.22-05-024 et. al. service lists. Address change requests to SCE's GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-6838. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

To view other SCE advice letters filed with the Commission, log on to SCE's web site at https://www.sce.com/wps/portal/home/regulatory/advice-letters.

For questions, please contact Joe Cox at (626) 302-4811 or by electronic mail at Joe.Cox@sce.com

Southern California Edison Company

/s/ Connor Flanigan
Connor Flanigan

CF:jc:bvs
Enclosure



California Public Utilities Commission

ADVICE LETTER SUMMARY

ENERGY UTILITY

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

Company name/CPUC Utility No.: **Southern California Edison Company (U 338-E)**

Utility type:
☑ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: **Darrah Morgan**
Phone #: **(626) 302-2086**
E-mail: **AdviceTariffManager@sce.com**
E-mail Disposition Notice to: **AdviceTariffManager@sce.com**

EXPLANATION OF UTILITY TYPE
ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: **5361-E et al.**

Tier Designation: **2**

Subject of AL: **Joint Submittal Outlining Workshop Results and Process Improvements Pursuant to Ordering Paragraph 8 of Decision 24-05-065**

Keywords (choose from CPUC listing): **Compliance,**

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☑ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:
Decision 24-05-065

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: **8/29/24**

No. of tariff sheets: **-0-**

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: **None**

Service affected and changes proposed[1]:

Pending advice letters that revise the same tariff sheets: **None**

[1]Discuss in AL if more space is needed.

Clear Form

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: **Connor Flanigan**
Title: **Managing Director, State Regulatory Operations**
Utility/Entity Name: **Southern California Edison Company**

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: **AdviceTariffManager@sce.com**

Contact Name: **Adam Smith c/o Karyn Gansecki**
Title: **Director, Regulatory Relations**
Utility/Entity Name: **Southern California Edison Company**

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: **karyn.gansecki@sce.com**

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

Clear Form

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	

Clear Form

APPENDIX A

Contact advicetariffmanager@sce.com for the excel sheet

METRICS

All metrics should be displayed on the CVC-Share website at the program level by LSE. The end user may have the option to aggregate and view the program's metrics by service territory, LSE, or any other groupings deemed appropriate in design meetings. Upon more in depth discussions with the PAs, the vendor and E.D. the PAs submit that the information below may change in order to best serve the reporting needs of the program.

Data Category	Metric	Definition	Format/Display	Cadence	DAC-GT	CSGT	CEC	Modified GT	CREP	Source	Notes
Program - Capacity	Program Cap	Maximum number of MWs designated for program	Number	N/A	X	X	X	X	X	suggested by PAs	Program cap can be provided one time and updated as needed with the vendor.
Program - Cost	Annual program costs	Total program costs for the year based on actuals	Number	Annually	X	X	X	X	X	suggested by ED	
Program - Projects	Projects procured (aka "Projects approved")	Total number of executed project PPAs approved by the Commission	Number	Quarterly	X	X	X	X	X	D.20-08-046 OP 6	
Program - Capacity	MWs procured	MWs procured, defined as PPAs approved by the commission	Number	Quarterly	X	X	X	X	X	suggested by PAs	
Program - Projects	Projects online (aka "Projects completed")	Total number of dedicated projects online	Number	Quarterly	X	X	X	X	X	D.24-05-065 OP 6	May want to have the option to display this by technology type
Program - Capacity	MWs online	Dedicated MWs online	Number	Quarterly	X	X	X	X	X	suggested by PAs	May want to have the option to display this by technology type
Program - Capacity	Annual program generation	Total generation of all online projects contained in MWh	Number	Annually	X	X	X	X	X	suggested by PAs	
Program - Capacity	Annual Unsubscribed MWh	Number of unsubscribed MWhs, derived from total program generation minus participant usage/ RECs retired	Number	Annually	X	X	X	X	TBD	D.24-05-065 pp.125-130	This metric is derived from total generation less participant usage, so there is no need to send this data to the vendor, therefore it is not listed in the "Fields" table below.
Program - RECs	Annual MWh of Participant Usage	Total number of MWhs served to participants	Number	Annually	X	X	X	X	X	D.20-08-046 pp.129-130	
Program - REDs	Annual MWh of RPS/Interim RECs retired for participants	Total number of RPS RECs in MWHs that come from interim resources retired to serve participants	Number	Annually	X	X	-	X	TBD	D.24-05-065 pp.129-130	
Program - REDs	Annual MWh of Programmatic/dedicated RECs retired for participants	Total number of Programmatic RECs in MWhs that come from dedicated resources retired to serve participants	Number	Annually	X	X	X	X	TBD	D.24-05-065 pp.129-130	
Program - Subscriber	Number of customers enrolled	Total number of customers (service agreements) currently enrolled in the program	Number	Quarterly	X	X	X	X	X	suggested by ED	The number of customers enrolled may need to be segmented by a customer type (example, low income, or medium risk) depending on the program. This will be discussed in more detail with the vendor and needed data elements provided.
Program - Subscriber	MWs enrolled	Number of MWs enrolled in program	Number	Quarterly	X	X	X	X	X	suggested by PAs	This is a forecasted number. PAs should align on calculation.
Program - Subscriber	Number of low-income customers enrolled	Total number of customers enrolled in low-income customer programs (e.g., CARE/FERA)	Number	Quarterly	X	X	-	-	X	suggested by PAs	
Program - Subscriber	Number of new low-income customers enrolled in CARE/FERA at the time of program enrollment	Number of new low-income customer enrollments in CARE or FERA in the process of enrolling in the program	Number	Quarterly	-	X	-	-	-	suggested by PAs	
Program - Subscriber	Average customer monthly discount	Average monthly bill discount provided to customers based on actuals	Number	Annually	X	X	-	-	X	suggested by ED	Further discussion between PAs and vendor will be needed to determine how best to display this metric (i.e. in dollars or as a percentage of average bill, or both etc.) Additionally, certain requirements should likely be met for including the customer in the average bill discount calculation (ex: minimum length of enrollment, etc.).
Program - Subscriber	CSGT master-metered accounts	The total number of master-metered accounts participating in the CSGT Program	Number	Quarterly	-	X	-	-	-	D.20-08-046 OP 6	This information addresses "subscriber information" as required in OP 6.
Program - Subscriber	CSGT master-metered capacity	The total capacity, in MWs, allocated to master-metered accounts participating in the CSGT Program	Number	Quarterly	-	X	-	-	-	D.24-05-065 OP 6	This information addresses "subscriber information" as required in OP 6.

FIELDS

All data sent to the vendor will be either at the project level, or overall program level. It is still TBD whether granular level customer data should be sent to the vendor and what value that would provide. Upon more in depth discussion with the PAs, the vendor, and E.D the PAs submit that the information below may change in order to best serve the reporting needs of the program.

Data Category	Field	Definition	Format/Display	Cadence	DAC-GT	CSGT	ECH	Modified GT	CREP	Source	Notes
Program - Cost	Annual program costs	Total program costs for the year based on actuals	Number	Annually	X	X	X	X	X	suggested by ED	
Program - REDs	Annual MWh of Participant Usage	Total number of MWhs served to participants	Number	Annually	X	X	X	X	X	D.24-05-065 pp.129-130	
Program - REDs	Annual MWh of RPS/Interim RECs retired for participants	Total number of RPS RECs in MWHs that come from interim resources retired to serve participants	Number	Annually	X	X	-	X	TBD	D.24-05-065 pp.125-130	
Program - REDs	Annual MWh of Programmatic/dedicated RECs retired for participants	Total number of Programmatic RECs in MWhs that come from dedicated resources retired to serve participants	Number	Annually	X	X	X	X	TBD	D.24-05-065 pp.125-130	
Program - Subscriber	Number of customers enrolled	Total number of customers (service agreements) currently enrolled in the program	Number	Quarterly	X	X	X	X	X	suggested by ED	Will need to determine how best to send subscriber information to vendor (i.e. do we send individual subscriber level data or aggregate the data and provide whole figures).
Program - Subscriber	MWs enrolled	Number of MWs enrolled in program	Number	Quarterly	X	X	X	X	X	suggested by PAs	This is a forecasted number. PAs should align on calculation.
Program - Subscriber	Number of low-income customers enrolled	Total number of customers enrolled in low-income customer programs (e.g., CARE/FERA)	Number	Quarterly	X	X			X	suggested by PAs	
Program - Subscriber	Average customer monthly discount	Average monthly bill discount provided to customers based on actuals	Number	Annually	X	X	-	-	X	suggested by ED	Further discussion between PAs and vendor will be needed to determine how best to display this metric (i.e. in dollars or as a percentage of average bill, or both etc.) Additionally, certain requirements should likely be met for including the customer in the average bill discount calculation (ex: minimum length of enrollment, etc.).
Program - Subscriber	CSGT master-metered accounts	The total number of master-metered accounts participating in the CSGT Program	Number	Quarterly	-	X	-	-	-	D.20-08-046 OP 6	This information addresses "subscriber information" as required in OP 6.
Program - Subscriber	CSGT master-metered capacity	The total capacity, in MWs, allocated to master-metered accounts participating in the CSGT Program	Number	Quarterly	-	X	-	-	-	D.24-05-065 OP 6	This information captures "subscriber information" as required in OP 6.
Project - General	Project name	The name of the project as presented in the contract or other official documents	Text	Quarterly	X	X	X	X	X	suggested by PAs	
Project - General	Project facility status	Overall project facility status: In Development: A PPA has been signed and the project is being developed. Projects should have an Overall Project Status of "In Development" if they have a Facility Status of "Online-Partially Delivering", or have a Facility Status of "Online-Fully Delivering" but have not yet started the delivery term. Online: All phases of the project are online and delivering energy, and the delivery term has commenced. Terminated: Project was terminated at any point after execution and prior to completing the delivery term under the PPA. Expired: Project expired after being online and completing the delivery term under the PPA.	Text	Quarterly	X	X	X	X	X	D.24-05-065 OP 6	
Project - Capacity	Project capacity	Project capacity in MW	Number	Quarterly	X	X	X	X	X	D.24-05-065 OP 6	
Project - Capacity	Annual project generation	Total generation of project in MWh	Number	Annually	X	X	X	X	X	suggested by PAs	
Project - Technology	Project technology	Project technology (ex: solar, storage)	Text	Quarterly	X	X	X	X	X	suggested by PAs	Analysis of how this data should be sent to the vendor will be needed since one project can potentially have more than 1 technology (ex: solar + storage).
Project - Location	City	City of project location	Text	Quarterly	X	X	X	X	X	D.24-05-065 OP 6	This project level data can be displayed or summarized as desired in coordination with the vendor.
Project - Location	State	State of project location	Text	Quarterly	X	X	X	X	X	D.24-05-065 OP 6	This project level data can be displayed or summarized as desired in coordination with the vendor.
Project - Location	Zip code	Zip code of project location	Text	Quarterly	X	X	X	X	X	D.20-08-046 OP 6	This project level data can be displayed or summarized as desired in coordination with the vendor.
Project - Subscriber	Project Sponsors subscribed	Verification if each CSGT Projects Sponsor is receiving energy from that project	Text	Quarterly	-	X	-	-	-	D.24-05-065 OP 6	Project Sponsors can elect to receive energy from the CSGT project they are sponsoring. Verification that the CSGT Project Sponsor is receiving energy from the CSGT Project will be reported as "Yes" or "No". This information addresses "subscriber information" as required in OP 6.
Project - Subscriber	Project Sponsor subscription size	Size of each Project Sponsor's subscription, per CSGT project, in MW	Number	Quarterly	-	X	-	-	-	D.24-05-065 OP 6	Project Sponsors can elect to receive energy from the CSGT project they are sponsoring. This information addresses "subscriber information" as required in OP 6.
Project - Subscriber	Number of low-income qualified customers enrolled	Total number of customers enrolled in low-income qualified customer programs (e.g., CARE/FERA) per CSGT project	Number	Quarterly	-	X	-	-	-	D.20-08-046 OP 6	This information addresses "coordination with low-income... programs" as required in OP 6.
Project - Community	Job training	The number of workers registered in a State of California approved apprenticeship program, per CSGT project.	Number	Quarterly	-	X	-	-	-	D.20-08-046 OP 6	This information addresses "job training" as required in OP 6.
Project - Community	Local hiring	The number of workers whose place of residence is located within a 25- mile radius of the CSGT project.	Number	Quarterly	-	X	-	-	-	D.24-05-065 OP 6	This information addresses "local hiring" as required in OP 6.

PA	Modified GT	Modified DAC-GT	CRE Program	ECR (already contracted)	CSGT (not transitioned to DAC-GT)
Southern California Edison	x	x	x	x	
San Diego Gas & Electric	TBD		TBD		
Pacific Gas & Electric Company	x	x	x		
CleanPowerSF		x	TBD		
Ava		x	TBD		
Cal Choice		x	TBD		
Clean Power Alliance		x	TBD		x
Marin Clean Energy		x	TBD		
Peninsula Clean Energy		x	TBD		
San Diego Community Power		x	TBD		
San Jose Clean Energy		x	TBD		