Date of Issuance: November 9, 2020

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION **RESOLUTION E-5102**
November 5, 2020

R E S O L U T I O N

Resolution E-5102: Approving with Modification, Clean Power Alliance's Tariffs to Implement the Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs.

PROPOSED OUTCOME:

- Approves Clean Power Alliance's (CPA's) Advice Letter (AL) 4-E/E-A to create Disadvantaged Communities Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT) rates and program design in compliance with Decision (D.)18-06-027.

SAFETY CONSIDERATIONS:

- There are no expected safety implications associated with approval of this Resolution.

ESTIMATED COST:

- The costs to implement the DAC-GT and CSGT programs have yet to be determined. The impact on rates cannot be estimated at this time, because these programs will be funded through greenhouse gas allowance proceeds and only then, if insufficient revenue is available, through public purpose program funds.

By CPA AL 4-E, filed on December 27, 2019 and CPA AL 4-E-A filed on July 17, 2020.

SUMMARY

This Resolution approves, with modification, Clean Power Alliance's (CPA's) Advice Letter (AL) 4-E/E-A to create tariffs to implement the Disadvantaged

Communities Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT) programs. The California Public Utilities Commission (CPUC) requires CPA to modify their DAC-GT and CSGT tariffs pursuant to the direction provided in this Resolution on issues that were raised in replies to the AL, and on aspects of CPA's program implementation that warrant clarification.

BACKGROUND

The Disadvantaged Communities Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT) programs are available to residential customers who reside in Disadvantaged Communities (DACs), as defined by Decision D.18-06-027 (the Net Energy Metering Disadvantaged Communities Decision or NEM DAC Decision). The DAC-GT program is only available to residential DAC customers who are eligible for either the California Alternate Rates for Energy (CARE) program or the Family Electric Rate Assistance (FERA) program.[1] The CSGT program is available to both CARE- or FERA-eligible and non-income-qualified residential DAC customers (including customers in San Joaquin Valley pilot communities),[2] but 50 percent of a CSGT project's capacity must be subscribed to CARE- or FERA-eligible customers before any non-income-qualified customers are able to participate.[3] In addition, community sponsors may be eligible to subscribe up to 25 percent of a CSGT project's capacity. Both DAC-GT and CSGT will provide a 20 percent discount on a participating customer's otherwise applicable tariff.

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[1] D.18-06-027 at 51.

[2] D.18.12.015 authorized a limited exemption to the CSGT program which allows CSGT projects to be located up to 40 miles from the 11 participating San Joaquin Valley (SJV) pilot communities of Allensworth, Alpaugh, California City, Cantua Creek, Ducor, Fairmead, Lanare, Le Grand, La Vina, Seville, and West Goshen. The pilot objectives include providing access to affordable energy options, reducing household energy costs, and increasing health, safety, and air quality of participating host communities and customers. The pilots will also gather information to assess cost-effectiveness and feasibility, test approaches to efficiently implement interventions, and assess potential scalability.

[3] D.18-06-027 at COL 23-25.

Decision D.18-06-027 authorized Community Choice Aggregators (CCAs) to develop and implement their own DAC-GT and CSGT programs, and authorized them to access greenhouse gas (GHG) allowance revenues and public purpose program (PPP) funds to support these programs, if each CCA submits a Tier 3 advice letter (AL) demonstrating how their DAC-GT and CSGT programs will abide by all rules and requirements for the programs established in the NEM DAC Decision.

In order to align program capacity allocation with the proportion of residential DAC customers served by CCAs, Resolution E-4999[4] allocated capacity to existing CCAs based on the proportional share of residential customers in DACs that each CCA serves. The Resolution allocated 12.19MW for DAC-GT and 3.13MW for CSGT to CPA within Southern California Edison's (SCE's) service territory.

On September 16, 2019, Energy Division (ED) staff facilitated a workshop with the large electric investor owned utilities (the IOUs) and various CCAs to discuss potential implementation issues to proactively address barriers and areas of potential conflict. Discussion focused on applying the cost cap[5] to CCA programs, capacity allocation, the ability for CCAs to share or trade program capacity, how CCA service expansion might impact existing IOU projects, the Energy Resources Recovery Account (ERRA) review process[6] for CCA programs, and the CCA Tier 3 AL filing process and requirements. These issues were to be formally decided through the disposition of each CCA's Tier 3 AL filing.

On October 15, 2019, ED staff facilitated a billing working group meeting among the IOUs and various CCAs to discuss the appropriate application of the bill discount, the budget and cost recovery process, and data sharing needs. The IOUs and CCAs agreed to continue this discussion and agreed that these issues would be formally resolved during the CCAs' AL process.

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[4] Issued June 3, 2019. http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M297/K211/297211380.PDF

[5] *Id.* at 84.

[6] Resolution E-4999 at 28-29 and OPs 3-4.

CPA filed AL 4-E on December 27, 2019 to create both a DAC-GT and CSGT program which included specified rates for eligible customers. CPA's AL proposes to launch DAC-GT and CSGT programs beginning in 2020. CPA proposes to serve DAC-GT customers during an interim period, defined as the time between program approval and when newly procured DAC-GT projects come online, using previously existing DAC-GT eligible resources purchased through SCE. Once CPA's new DAC-GT resources come online, CPA customers will be transferred from the previously existing resources to the newly constructed projects.[7] CPA's proposal for an interim period is consistent with Resolution E-4999 which permits IOUs to serve DAC-GT customers through existing GT or Renewable Portfolio Standard (RPS) projects that meet DAC-GT eligibility requirements on an interim basis until new projects come online.[8]

CPA filed a supplemental AL (4-E-A) on July 17, 2020 to address issues raised in SCE's reply to CPA's AL including application of the bill discount and sharing of billing information.

NOTICE

Notice of AL 4-E and CPA 4-E-A was made by publication in the CPUC's Daily Calendar. CPA states that a copy of these ALs were mailed and distributed in accordance with Section 4 of General Order 96-B.

PROTESTS

No protests were filed.

SCE's Reply to CPA's AL

On January 16, 2020, SCE submitted a timely reply to CPA AL 4-E. In its reply, SCE generally supported CPA's cost recovery proposal, but requested adjustments to procedural aspects such as the timing of remittances from SCE to CPA and cost recovery to accommodate the enacted billing roles.[9] SCE's reply notes that CPA's proposed dates for the timing to transfer GHG funds from SCE

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[7] CPA AL 4-E at 13.

[8] Resolution E-4999 at 24.

[9] SCE Reply at 2.

to CPA seem reasonable based on historical auction dates, however, this timing may differ in the future. Therefore, SCE requests the ability to adjust timing of remittances or funds transfers to CPA. SCE also requests that the CPUC order CPA to submit its annual program budget estimates as a Tier 2 rather than a Tier 1 Advice Letter. SCE argues that this change in AL Tier will allow for sufficient time and analysis of CPA's annual forecast of program costs, including generation costs, bill discounts, administration, marketing, and true-up of prior year costs.

SCE's second point focused on CPA's statement that it "may not be practicable" to calculate rates for commercial customers taking service on CSGT in the long-term. SCE states that CPA's difficulty in calculating a more complex discount for commercial customers is not a valid reason to order SCE to perform the bill discount calculation for all customers in the CPA program. It is also inconsistent with SCE's Rule 23 which states "SCE is not responsible for computing or determining the accuracy of the CCA charges on the bill." SCE notes that for the CSGT program, sponsors are only allowed to subscribe 25% of a project's total output, resulting in a vast majority of CSGT subscribers being residential customers. SCE also states that it currently provides CPA with bill copies and bill component details as part of its monthly billing process. Should CPA not adopt the SCE proposal on commercial customer billing, SCE suggests that the CPUC order SCE and CPA to develop a process to share delivery bill data for commercial customers enrolled in CPA's CSGT program.[10]

Thirdly, SCE argues that CPA's bill discounts should be applied to the generation portion of a customer's bill. SCE's approved budget and implementation plan (filed in SCE AL 3851-E) offers the 20-percent discount as a tariff rider that is applied to the customer's otherwise applicable tariff (OAT) and reflected as a line item credit in the generation component of the customer's bill.[11] CPA proposes in AL 4-E to provide the 20-percent bill discount in both the generation and delivery components of a participating customer's bill. Both methods provide customers with the same amount of savings as these programs offer a 20-percent total bill discount; the question is where on the customers' bill the discount should appear. SCE argues that CPA's billing proposal would create

[10] SCE Reply at 3.
[11] SCE AL 3851-E at 4.

an inconsistency with SCE's own DAC-GT and CSGT programs and potentially confuse CPA customers who still receive delivery service from SCE.

CPA's Supplemental Filing Addressing SCE's Reply

As stated in CPA's AL 4-E-A, in the summer of 2020 CPA and SCE held discussions that addressed the issues raised in SCE's reply letter. In its supplemental filing, CPA notes that SCE has agreed to share delivery bill data for commercial customers enrolled in CPA's CSGT program, which is confirmed by SCE in their letter of support attached to CPA's supplemental AL. Additionally, AL 4-E-A clarifies that CPA will calculate the full bill discount for DAC-GT and CSGT residential customers based on the generation and delivery OATs, before taxes and fees, and to apply that discount as a line item credit to CCA charges on the customers' monthly bills. CPA's AL 4-E-A further revised the rate and discount language in its tariffs to reflect these points of agreement and attached a letter of support from SCE.[12]

DISCUSSION

The discussion section is arranged in two parts. The first section addresses issues identified in SCE's Reply to CPA's AL, while the second addresses aspects of CPA's proposed program implementation that are misaligned with direction provided in Decision D.18-06-027, or that warrant clarification.

Disposition of SCE's Reply Letter

CPA and SCE have agreed that CPA will calculate the full bill discount for DAC-GT and CSGT residential customers based on the generation and delivery Otherwise Applicable Tariffs, before taxes and fees, and to apply that discount as a line item credit to CCA charges on the customers' monthly bills. Additionally, SCE and CPA agreed to work collaboratively to share monthly data related to CSGT commercial customers who are serving as community sponsors and are eligible for the associated bill discount. We find this billing and information sharing approach appropriate and recognize that it is unique to CPA and SCE service territories given SCE's Customer Service Re-Platform (CSRP)

[12] CPA 4-E-A at 2-3.

implementation[13]. This approach was mutually agreed upon by both parties and will provide consistency in how the bill discount is applied across SCE and CPA customers' bills. This agreement was substantiated by SCE's Letter of Support dated July 17, 2020 and attached to CPA's supplemental AL 4-E-A.

We deny SCE's request for CPA to submit its annual program budget estimates as a Tier 2 Advice Letter. CPA's annual budget estimates should be submitted as a Tier 1 AL as outlined in Resolution E-4999.[14]

Additional aspects of program implementation that warrant clarification:

Independent Evaluator Funding

CPA's AL states that it will include a budget line item for an independent evaluator review in future program budgets. CPA proposes that independent evaluation of CCA DAC-GT and CSGT programs commence in 2022 or after the first full year of program implementation and that they will work with Energy Division to determine the appropriate scope, funding level and budget allocations for CCAs to include in their 2022 and subsequent program year budgets.[15]

Resolution E-4999 found that the IOUs' DAC-GT and CSGT budgets "must include funding for the independent evaluator for 2019-2020 as specified in this Resolution ($176,000 each for PG&E and SCE and $48,000 for SDG&E)."[16] To maintain efficiency and consistency across IOU and CCA DAC-GT and CSGT

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[13] CPA AL 4-E states "In order to expedite DAC-GT program launch and customer access to program benefits in advance of Southern California Edison's ("SCE") Customer Service Re-Platform ("CSRP") implementation in PY 2020-2021, CPA proposes as an interim approach to calculate the full bill discount for DAC-GT customers based on the generation and delivery OATs, before taxes and fees, and to apply that discount as a line item credit to CCA charges on the customers' monthly bills. This interim billing approach does not require any additional action by SCE as it will be solely implemented by CPA."

[14] Resolution E-4999 at 26.

[15] CPA 4-E at 17 and 20.

[16] Resolution E-4999 at 68.

programs, we find it reasonable that responsibilities for funding the independent evaluator review remain with the IOUs for each service territory in which a CCA resides. One statewide Independent Evaluator will evaluate all IOU and CCA DAC-GT and CSGT programs statewide according to the schedule outlined in D.18.06-027.[17] As such, we reject CPA's request for its own independent evaluator budget.

Budget & Cost Recovery

As discussed above, while CPA sought to include funding for an independent evaluator review in future program budgets, their 2020-2021 budget included in AL 4-E Appendix 2 did not include any funding for this line item. We hereby approve CPA's program budget estimate for Program Years (PY) 2020 and 2021. CPA shall submit an annual program budget estimate and an annual Marketing, Education, and Outreach (ME&O) plan by February 1st of every year, starting in 2021, for the next program year.[18]

CPA outlines additional procedural steps regarding ERRA compliance and cost recovery between CPA and SCE[19] as outlined below:

1. SCE will include both the PY 2020 and PY 2021 budget estimates in its 2021 ERRA Forecast filing in early June or its 2021 ERRA Forecast update in November.
2. Once the CPUC approves CPA's Annual Budget Advice Letter, SCE will include the total budget estimate for the upcoming program year in the ERRA Forecast filing due in early June of each year.
3. Once SCE receives approval of its ERRA Forecast from the CPUC, SCE will record CPA's approved budgets in the DAC-GT and CSGT sub account and set aside the total requested CPA budget in a sub account of its DAC-GT and CSGT balancing accounts.
4. SCE will then remit program funds to CPA in four quarterly installments (by January 1, April 1, July 1 and October 1 of each year). If the ERRA Forecast is not approved by January 1 of a given PY, then SCE will transfer

[17] D.18-06-027 at OP 18 and Resolution E-4999 at OP 5.
[18] Resolution E-4999 at OP 2.
[19] CPA AL 4-E at 18-19

all past due funds to CPA within no less than thirty days of issuance of ERRA Forecast approval.

5. Once received, CPA will track the program funds and costs in separate accounts (i.e., one account for its CSGT program funds and a separate account for its DAC-GT program funds). These accounts will record all generation cost deltas, customer bill discounts, and program expenses and will be the basis for recording actual expenditures in the Annual Budget Advice Letters.

We find this proposal reasonable. It is also expected that CPA will provide SCE with any requested data regarding GHG allowance expenditures so that SCE can fulfill Air Resources Board (ARB) reporting requirements.

Application of Cost Cap to CCA Programs

CPA's original AL proposes that "Eligibility for procurement under the DAC-GT program requires that bid pricing must be at or below the statewide CCA cost cap provided to CCAs by the CPUC's Energy Division Staff via email on September 5, 2019."

To limit non-participating ratepayer exposure, the NEM DAC Decision established a cost-containment mechanism for CSGT projects.[20] Resolution E-4999 established a similar price cap for DAC-GT projects in order to limit project costs.[21] On September 5, 2019 Energy Division Staff clarified via email the price cap that each CCA is expected to use to evaluate future Community Solar Green Tariff (CSGT) projects. That communication also clarified that eligibility for procurement under the DAC-GT program requires that bid pricing must be at or below the statewide CCA cost cap and that CCAs are expected to compare the unadjusted CSGT project bids to the price cap. In other words, CCAs should use the price cap to screen the submitted bid prices before making any adjustments to those prices such as time of delivery adjustments. This price cap applies to all

[20] D.18-06-027 at 84 states "To limit non-participating ratepayer exposure, utilities should limit contract awards to Community Solar Green Tariff program projects whose bid price is at or below the higher of 200 percent of the maximum executed contract price in either the Renewable Auction Mechanism's as-available peaking category or the Green Tariff program."

[21] Resolution E-4999 at 36.

CCAs statewide that are eligible to participate in the CSGT program and is based on an average of the three IOUs' cost caps.

During the September 16th, 2019 Program Implementation Workshop, Energy Division staff further clarified that the value of the CCA cost cap will change when all three IOUs procure new resources under the Green Tariff Shared Renewables (GTSR) program or under the Renewable Auction Mechanism (RAM) as-available-peaking category (i.e. all three IOUs price caps change). Energy Division will notify the CCAs when this occurs.

We hereby adopt CPA's proposal to abide by the CCA cost cap as outlined above.

Solicitation Frequency & Review

Resolution E-4999 OP 8 required, within 60 days of issuance of the resolution, the IOUs to submit Tier 2 ALs with their solicitation documents for their first DAC-GT and CSGT Request for Offers (RFOs). Additionally, the resolution specified "each utility shall issue its RFO within 60 days of the CPUC's approval of its solicitation documents." After this first solicitation, each utility should align future DAC-GT and CSGT solicitations with Green Tariff Shared Renewables (GTSR) solicitations and ensure that such solicitations occur biannually.[22]

CPA proposes holding DAC-GT and CSGT RFOs once a year or as needed until the program capacity allocations are reached.[23] We find CPA's proposal reasonable since CCAs have a much smaller capacity allocation compared to the IOUs (based on share of eligible customers within DACs). We approve CPA's proposal to hold solicitations once a year or as needed.

As discussed in D.18-06-027,[24] both the DAC-GT and CSGT programs are based on the GTSR program model and thus the requirements are closely aligned. D.16-05-006, which made refinements to the GTSR program states, "Contracts

[22] D.18-06-027 at 82.
[23] CPA AL 4-E at 12-13.
[24] D.18-006-027 at 51 and 64.

awarded in each solicitation should also be submitted for CPUC approval through a Tier 2 Advice Letter process."[25] To ensure that the DAC-GT and CSGT programs comport with CPUC direction, the CPUC must maintain appropriate oversight of the programs and their use of GHG auction proceeds and PPP funds. Thus, we require CPA to file a Tier 2 AL with their solicitation documents. This filing shall provide any executed power purchase agreements in alignment with D.18-06-027 and Resolution E-4999.

Program Capacity Allocations

Resolution E-4999 allocated 12.19MW for DAC-GT and 3.13MW for CSGT to CPA within Southern California Edison's (SCE's) service territory. For clarity we restate here the minimum and maximum project size for each program under CPA. For DAC-GT, the minimum project size is 500kW and the maximum project size is 12.19MW.[26] For CSGT there is no minimum CSGT project size and the maximum project size is 3MW.[27]

CCA Project Sponsorship

To incentivize sponsorship involvement, D.18-06-027 allows community sponsors to take service of up to 25% of a CSGT project's energy output (not to exceed the sponsor's energy needs) and receive a 20% overall bill credit. The Decision defined community sponsorship as including local government entities such as Community Choice Aggregators.[28] Since CPA will be administering its RFO, enabling CPA to take service of up to 25% of a CSGT project's energy output could present a conflict of interest. There could be a case where a CCA selects itself as part of the winning bid, which would violate the openness, fairness, and transparency of the RFO process. Therefore, we clarify that a CCA may not act as a sponsor for any CSGT projects in its own service territory.

[25] D.16-05-006 at 19.

[26] D.18-06-027 at 51 and Resolution E-4999 at 24.

[27] D.18-06-027 at 73 and Resolution E-4999 at 22 and 36-37.

[28] D.18.06-027 at 17.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days public review. Please note that comments are due 20 days from the mailing date of this resolution. Section 311(g)(2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this resolution was neither waived nor reduced.

Comments were timely filed on October 26, 2020 by Clean Power Alliance.

Including Budget Estimates in November ERRA Update

Clean Power Alliance (CPA) comments reiterate that, as proposed in AL 4-E, the CPUC should direct SCE to include CPA's estimated budget for Program Year (PY) 2020 and PY 2021 in its November update to A. 20-07-004. CPA notes that SCE expressed their willingness to include the estimated budget in its November update. We find this request reasonable and the Resolution is modified accordingly.

Revisions to Tier 2 AL Requirement for Executed PPAs

CPA comments that it will comply with the requirement that CPA file a Tier 2 AL for its executed PPAs. However, CPA requests that this requirement be in alignment with the requirements of D.18-06-027 rather than the Green Tariff Shared Renewables (GTSR) and the Renewable Auction Mechanism (RAM) as stated in the Draft Resolution. CPA notes that GTSR and RAM are IOU-exclusive programs by statute and are not applicable to Community Choice Aggregators (CCAs). Additionally, CPA notes that CCA procurement strategies are unlike RAM and GTSR in that they are subject to the oversight of their governing boards and may prioritize evaluation criteria beyond costs such as workforce development, benefits to DACs, environmental stewardship, project location, and development risks. We agree. We clarify that RAM and GTSR are IOU-specific programs and modify the Resolution accordingly, but CPA must ensure that their DAC-GT and CSGT programs are in accordance with D.18-06-027 and Resolution E-4999.

CPA also comments that it may prove challenging to meet the requirement in the Draft Resolution to submit a Tier 2 AL with their executed PPAs within 90 days after notifying selected bidders. As noted earlier, CPA's comments posit that its Request for Offer (RFO) and contract approval process differ from RAM in that they are negotiable according to DACGT and CSGT requirements and CPA's procurement policy. Upon notifying selected bidders, CPA notes that contract negotiation as well as approval and execution by its Board of Directors could take longer than 90 days. Specifically, CPA states that CSGT projects would require more time to engage multiple project participants. As such, CPA request that the Draft Resolution be revised to require the Tier 2 AL for executed PPAs to be submitted no later than 90 days after contract execution, rather than after notifying selected bidders.

In order to balance the interests in ensuring that 1) these programs are implemented in a timely manner and 2) CPA has the time needed to allow for contract negotiation and Board of Director approval, we modify the submission deadline of the executed PPA Tier 2 AL to be no later than 180 days after notifying selected bidders. If additional time is needed, the director of Energy Division, or his/her/their designee, is authorized to adjust this schedule if necessary.

FINDINGS AND CONCLUSIONS

1. On June 22, 2018, pursuant to AB 327, the CPUC adopted Decision (D.)18-06-027 (NEM DAC Decision), creating the DAC Green Tariff (DAC-GT) program, and the Community Solar Green Tariff program (CSGT), which provide residential customers in DACs increased access to renewable generation.
2. The NEM DAC Decision authorized community choice aggregators (CCAs) to develop and implement their own DAC-GT and CSGT programs, and authorized them to access greenhouse gas (GHG) allowance revenues and public purpose program funds to support these programs, if each CCA submits a Tier 3 AL demonstrating how their DAC-GT and CSGT programs will abide by all rules and requirements for the programs established in the NEM DAC Decision.
3. The NEM DAC Decision required CCAs to file Tier 3 Advice Letters (ALs) to create a DAC-GT tariff and a CSGT tariff.

4. On June 3, 2019 Resolution E-4999 was issued and approved with modification, PG&E, SCE and SDG&E's tariffs to implement their Disadvantaged Communities Green Tariff and Community Solar Green Tariff Programs.
5. Resolution E-4999 allocated capacity to CCAs based on the proportional share of residential customers in DACs that each CCA serves and set out this allocation in Table 1 and Table 2 of that Resolution.
6. On December 27, 2019 CPA filed AL 4-E that proposed its plan to implement DAC-GT and CSGT programs.
7. On January 16, 2020, SCE submitted a timely reply to CPA AL 4-E that requested the ability to adjust procedural aspects of CPA's cost recovery proposal, requested that SCE not be responsible for calculating bill discounts for CPA's customers, and proposed that CPA's bill discount be applied to the generation components of a customer's bill.
8. On July 17, 2020 CPA submitted supplemental AL 4-E-A that addressed concerns in SCE's reply and included additional detail and letter of support from SCE.
9. It is reasonable for SCE to include CPA's PY 2020 and PY 2021 budget estimates in its 2021 ERRA Forecast filing in June or ERRA Forecast update in November, record CPA's approved budgets in the DAC-GT and CSGT balancing accounts, and for SCE to then transfer program funds to CPA in quarterly installments.
10. To limit non-participating ratepayer exposure, it is reasonable for CPA to apply a price cap to their CSGT programs similar to the DAC-GT price cap established in Resolution E-4999.
11. It is reasonable for CPA to issue DAC-GT and CSGT RFOs once a year or as needed rather than twice a year due to its comparatively smaller capacity allocation.
12. For the purposes of consistency across IOU and CCA programs, it is reasonable to require that CPA submit executed PPAs for review via a Tier 2 Advice Letter in alignment with D.16-05-006.
13. It is reasonable to reject CPA's request for its own independent evaluator budget in order to maintain efficiency and consistency across IOU and CCA DAC-GT and CSGT programs.

14. It is appropriate to clarify the minimum and maximum project sizes for DAC-GT and CSGT programs under CPA according to D.18-06-027 and Resolution E-4999.
15. In order to prevent possible conflicts of interest when administering RFOs, it is reasonable to clarify that a CCA may not act as a sponsor for any CSGT project in its own service territory.

THEREFORE IT IS ORDERED THAT:

1. Clean Power Alliance Advice Letters 4-E/4-E-A are approved with the clarifications specified herein.
2. Clean Power Alliance shall submit a Tier 2 Advice Letter with their solicitation documents for their first Disadvantaged Communities Green Tariff and Community Solar Green Tariff Request for Offers within 60 days of issuance of this Resolution. The Community Choice Aggregator shall issue its first Request for Offers within 60 days of the Commission's approval of its solicitation documents.
3. Clean Power Alliance will submit all executed Power Purchase Agreements via a Tier 2 Advice Letter for approval no later than 180 days following notification of selected bidders. If additional time is needed, the director of Energy Division, or his/her/their designee, is authorized to adjust this schedule if necessary.
4. Southern California Edison (SCE) will include Clean Power Alliance's (CPA's) estimated budget for Program Year (PY) 2020 and PY 2021 in its November ERRA Update. Once SCE receives approval from the Commission of its Energy Resources Recovery Account Forecast, SCE will record CPA's approved budgets in the Disadvantaged Communities Green Tariff and Community Solar Green Tariff balancing accounts and transfer program funds to CPA in quarterly installments.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on November 5, 2020; the following Commissioners voting favorably thereon:

/s/ Rachel Peterson
RACHEL PETERSON
Executive Director (Acting)

MARYBEL BATJER
President
LIANE M. RANDOLPH
MARTHA GUZMAN ACEVES
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA
Commissioners