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May 24, 2022

California Public Utilities Commission  
Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue, 4th Floor  
San Francisco, CA 94102-3298

### **MCE Advice Letter 62-E**

#### **Re: Correction to MCE Advice Letter 58 -E – 2023 Budget Request for the Disadvantaged Communities Green Tariff and the Community Solar Green Tariff Programs**

Pursuant to Ordering Paragraphs (“OP”) 2 and 4 of Resolution E-4999, and OP 3 of Resolution E-5125, Marin Clean Energy (“MCE”) hereby submits this Tier 2 Advice Letter (“AL”) to correct the program budget request for the Disadvantaged Communities Green Tariff (“DAC-GT”) and Community Solar Green Tariff (“CSGT”), originally submitted in MCE Advice Letter 58-E.

#### **TIER DESIGNATION**

This AL has a Tier 2 designation pursuant to OP 3 of Resolution E-5125.

#### **EFFECTIVE DATE**

Pursuant to G.O. 96-B, MCE requests that this Tier 2 AL become effective on June 23, 2022, which is 30 calendar days from the date of this filing.

#### **BACKGROUND**

On June 21, 2018, the California Public Utilities Commission (“Commission” or “CPUC”) approved D.18-06-027, adopting two new community solar programs to promote the use of renewable generation among residential customers in disadvantaged communities (“DACs”),<sup>1</sup> as directed by the California Legislature in Assembly Bill (“AB”) 327 (Perea), Stats. 2013, ch 611. The DAC-GT and the CS-GT programs offer 100% solar energy to eligible customers and provide a 20% discount on the electric portion of the bill.

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<sup>1</sup> DACs are defined under D.18-06-027 as communities that are identified in the most current version of CalEnviroScreen as among the top 25 percent of census tracts statewide, plus the census tracts in the highest five percent of CalEnviroScreen’s Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data. For purposes of this AL, MCE is using CalEnviroScreen 4.0, which was adopted in October 2021.

D.18-06-027 allows Community Choice Aggregators (“CCAs”) to develop their own DAC-GT and CS-GT programs, and states that CCAs that elect to offer DAC-GT and CS-GT must abide by all rules and requirements adopted in that decision.<sup>2</sup> Pursuant to OP 17 of D.18-06-027, MCE filed its Implementation AL (MCE AL 42-E) on May 7, 2020. The Commission approved AL 42-E in Resolution E-5124, issued April 15, 2021.

Resolution E-4999 sets the deadline for submitting annual DAC-GT and CS-GT program budget requests and ME&O plans for the upcoming PY by February 1<sup>st</sup> of each year.<sup>3</sup> The Resolution also provides details regarding the budget submission requirements and process. Furthermore, Resolution E-4999 specifies that Program Administrators must reconcile prior year budget forecasts and expenditures in their annual budget requests.<sup>4</sup>

Per D.18-06-027, the above requirements apply to participating CCAs as well. The submission and approval of this budget AL is the pre-requisite of having the DAC-GT and CS-GT budgets included in the Energy Resource Recovery Account (“ERRA”) Forecast in June each year. The ERRA Forecast in turn enables cost recovery under the programs. Therefore, MCE is submitting this cover letter to ensure accurate cost recovery for its programs.

## **PURPOSE**

MCE hereby submits this corrected budget request for PY 2023 for the DAC-GT and CS-GT programs. On page 4 of Attachment A, in Table 1: MCE Budget Forecast for PY 2023, the Subtotal Program Administration inadvertently excluded the CCA Integration Costs of \$2,430. This, in turn, impacts subsequent sums (Total DAC-GT PY 2023 Budget Forecast, Total DAC-GT and CS-GT PY 2023 Budget Forecast, Total DAC-GT Budget Request for PY 2023, and Total MCE Budget Request for PY 2023). MCE is submitting a revised Attachment A to correct the error.

The Subtotal Program Administration, Total DAC-GT Budget Forecast for PY 2023, Total DAC-GT and CS-GT Budget Forecast for PY 2023, Total DAC-GT Budget Request for PY 2023, and Total DAC-GT and CS-GT Budget Request for PY 2023 are all increased by \$2,430. MCE now requests a total budget of \$1,103,237 for the DAC-GT and CS-GT programs for PY 2023. Additional details can be found in the updated Appendix A.

For administrative convenience, a revised Attachment A is attached. Please discard the previously submitted Attachment A in its entirety.

## **CONCLUSION**

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<sup>2</sup> D.18-06-027, p. 104, OP 17.

<sup>3</sup> Resolution E-4999, OP 2.

<sup>4</sup> Resolution E-4999, OP 4.

MCE respectfully requests the Commission approve the budgets proposed herein and direct PG&E to transfer funds sufficient to meet MCE's approved annual budgets per the funding mechanisms set forth in Resolution E-5124.

## **NOTICE**

A copy of this AL is being served on the official Commission service list for Rulemaking R.14-07-002.

For changes to this service list, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

## **PROTESTS**

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

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Copies should also be mailed to the attention of the Deputy Executive Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter shall be sent by letter or transmitted electronically to the attention of:

Stephanie Chen  
Senior Policy Counsel  
Marin Clean Energy  
1125 Tamalpais Ave  
San Rafael, CA 94901  
Email: [schen@mcecleanenergy.org](mailto:schen@mcecleanenergy.org)

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 shall be submitted expeditiously.

## **CORRESPONDENCE**

For questions, please contact Stephanie Chen at (415) 464-6664 or by electronic mail at [schen@mcecleanenergy.org](mailto:schen@mcecleanenergy.org).

/s/ Stephanie Chen

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Senior Policy Counsel  
MARIN CLEAN ENERGY  
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San Rafael, CA 94901  
Telephone: (415) 464-6664  
Email: [schen@mcecleanenergy.org](mailto:schen@mcecleanenergy.org)

Appendices

Appendix A: PY 2023 Budget Request

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



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person:

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

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type:  Monthly     Quarterly     Annual     One-Time     Other:

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

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

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

Confidential treatment requested?  Yes     No

If yes, specification of confidential information:

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

Resolution required?  Yes     No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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

Tariff schedules affected:

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<sup>1</sup>Discuss in AL if more space is needed.

**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](mailto:EDTariffUnit@cpuc.ca.gov)

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

## ENERGY Advice Letter Keywords

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

**Budget Forecast for the Disadvantaged Communities Green  
Tariff and Community Solar Green Tariff Programs for the  
Program Year 2023**

*Proposed by Marin Clean Energy*





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## 1. BACKGROUND

Per Resolution E-4999, annual program budgets must be presented by program and include the following budget line items:<sup>1</sup>

1. Generation cost delta, if any;<sup>2</sup>
2. 20 percent bill discount for participating customers (generation portion);
3. Program administration costs:
  - a. Program management;
  - b. Information technology (IT);
  - c. Billing operations;
  - d. Regulatory compliance; and
  - e. Procurement.
4. Marketing, education and outreach (ME&O) costs:
  - a. Labor costs;
  - b. Outreach and material costs;
  - c. Local CBO/ sponsor costs (for CS-GT only).

In addition to budget reconciliation and forecast, annual program budget submissions also include details on program capacity and customer enrollment numbers for both programs. More specifically, MCE reports on:

1. Existing capacity at previous PY's close;
2. Forecasted capacity for procurement in the upcoming PY;
3. Customers served at previous PY's close; and
4. Forecasted customer enrollment for the upcoming PY.

Finally, MCE will submit the following workpapers to the California Public Utilities Commission (CPUC or Commission) Energy Division staff directly:

1. Calculation of the generation cost delta;
2. Calculation of the 20% bill discount to participating customers.

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<sup>1</sup> A detailed description of each budget line item can be found in MCE's Implementation Plan, submitted in Appendix A to MCE Advice Letter 42-E filed on May 7, 2020.

<sup>2</sup> Resolution E-4999 establishes that *above market* generation costs should include net renewable resource costs in excess of the otherwise applicable class average generation rate that will be used to calculate the customers' bills. In conversations with the CPUC's Energy Division after the release of the Resolution, it was clarified that this budget line item is intended to cover both a potential higher, as well as lower, cost of the DAC-GT/ CS-GT resources than the otherwise applicable class average generation rate. Hence, the term is updated to state the "*Delta of generation costs between the DAC-GT/ CS-GT resources and the otherwise applicable class average generation rate.*"

## 2. BUDGET FORECAST FOR PY 2023

For PY 2023, MCE forecasts a total budget of \$1,838,299 for the DAC-GT and CS-GT programs. A detailed budget forecast for each program by budget line item can be found in the table below.

*Table 1: MCE Budget Forecast for PY 2023*

Tab	Category	DAC-GT	CS-GT
1	Generation Cost Delta	\$ 988,083	\$ -
2	20% Bill Discount	\$ 280,035	\$ -
<b>Program Administration</b>			
3a	Program Management	\$ 84,050	\$ 97,150
3b	Information Technology	\$ 30,537	\$ 19,009
3c	Billing Operations	\$ 76,735	\$ 34,422
3d	Regulatory Compliance	\$ 7,860	\$ 7,860
3e	Procurement	\$ 26,815	\$ 31,093
3f	CCA Integration Costs	\$ 2,430	\$ -
<b>Subtotal Program Administration</b>		<b>\$ 228,427</b>	<b>\$ 189,534</b>
<b>Marketing, Education &amp; Outreach</b>			
4a	Labor Costs	\$ 21,615	\$ 59,605
4b	Outreach and Material Costs	\$ 20,000	\$ 26,000
4c	Local CBO/ Sponsor Costs	\$ -	\$ 25,000
<b>Subtotal ME&amp;O</b>		<b>\$ 41,615</b>	<b>\$ 110,605</b>
<b>Total</b>		<b>\$ 1,538,160</b>	<b>\$ 300,139</b>
			<b>\$ 1,838,299</b>

MCE provides the following clarifying notes regarding the budget summary.

### Generation Cost Delta

MCE has received bids for new projects to support DAC-GT, and is currently in the contract negotiation process. MCE conservatively anticipates that these resources may not come online until 2024. As such, MCE will continue to use an interim resource to support DAC-GT, and the DAC-GT generation cost delta budget forecast for 2023 is based on this interim resource. MCE did not receive any bids for CS-GT projects in its 2021 solicitation, and as such does not include a forecast for the CS-GT generation cost delta in this AL.

### 20 Percent Bill Discount

As set forth in Resolution E-5124, MCE receives the full bill information from PG&E on a monthly basis. MCE then calculates and presents the full 20% bill discount, which is shown on the generation portion of customer bills.<sup>3</sup> MCE only expects to have customers enrolled in the DAC-GT program in PY 2023. Customer enrollment for the CS-GT program is expected to begin in early 2024.

<sup>3</sup> Resolution E-5124, p. 12.

### **Program Administration Costs**

Program management includes program development, management, budgeting, and reporting. IT costs include the costs to develop program tools and updating existing systems to accommodate program enrollment and billing.

Billing operations covers costs for ongoing billing operations and customer support once all systems are developed. Regulatory covers costs for regulatory compliance and related program filings with the Commission. Procurement covers the costs to develop and manage the solicitations for solar resources under the program, as well as annual renewable energy credit (REC) retirement and compliance functions.

### **Marketing, Education and Outreach (ME&O)**

ME&O budgets are split in three categories – (1) MCE labor costs; (2) MCE direct costs for outreach and material; and (3) funds provided to the local CBOs who function as the sponsor for the CS-GT program.

## **3. BUDGET CAPS**

Resolution E-4999 establishes a cap of 10% of the total budget for program administration costs and a cap of 4% of the total budget for ME&O costs, to apply beginning with each administrator's third program year.<sup>4</sup> Subsequently, in recognition that these programs may exceed the established caps because of their relatively small size, the time it takes to launch, and the management-intensive program design of CS-GT, and other factors, the Commission permits PAs whose budgets exceed the established caps to submit a rationale supporting the exceedance in their Annual Budget Advice Letters (ABAL).<sup>5</sup> The ABAL was elevated from Tier 1 to Tier 2 to allow for additional review of this and other ABAL components.<sup>6</sup>

The 2023 budget forecast summarized above in Table 1 results in program administration budgets of 15% for DAC-GT and 63% for CS-GT, and ME&O budgets of 3% for DAC-GT and 37% for CS-GT. As such, MCE requests an adjustment to the program administration budget cap for both DAC-GT and CS-GT, and to the ME&O budget cap for CS-GT, for PY 2023. The factors contributing to these forecasts are described below.

### 2023 DAC-GT Program Administration Budget Forecast

MCE anticipates that the resources it solicited in 2021 to supply DAC-GT customers will come online in late 2023 or early 2024, which will require additional program administration and billing operations staff time to facilitate the installation of these resources and the integration of the new resources into the program. MCE anticipates that these will be one-time costs associated with the transition.

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<sup>4</sup> Resolution E-4999, p. 27.

<sup>5</sup> Resolution E-5125, p. 7.

<sup>6</sup> *Id.*

Additionally, MCE and PG&E continue to work toward a fully automated billing solution, which will reduce the staff time needed to ensure that customers receive the full benefit of DAC-GT enrollment in a timely manner. Until that fully automated solution is in place, MCE anticipates higher billing operations costs to ensure that enrolled customers are billed and credited correctly.

Finally, MCE only began enrolling customers in DAC-GT in fall of 2021, just a few months before the submission of this AL. As such, MCE is still evaluating what staff time and direct costs will be required to run its program in a steady state. MCE anticipates it will further refine its forecasting in future budget ALs, with the benefit of additional experience administering this program. These factors in conjunction with the relatively small capacity allocation assigned to MCE<sup>7</sup> cause MCE's program administration budget forecast to exceed 10% of its total DAC-GT budget.

### 2023 CS-GT Program Administration Budget Forecast

As noted above, MCE has not yet received any qualifying bids for CS-GT projects, and therefore does not include any generation cost delta or bill discount forecasts for CS-GT. However, program administration costs are still being incurred, as MCE works to identify qualifying projects, create and refine billing and other administrative processes, and prepare to launch its program. As illustrated in Table 2 below, this delay in launching CS-GT has significantly reduced MCE's actual costs incurred for program administration in 2021, but has shifted some of these costs forward into the 2023 forecast.

As discussed in Resolution E-5125, CS-GT may be particularly difficult to hold to a 10% program administration cost cap because of its management-intensive program design, relatively small capacity allocations,<sup>8</sup> and extended procurement and customer enrollment time frames. MCE has experienced some of these challenges to date in its attempts to identify potential community sponsors and project sites that meet CS-GT criteria. MCE includes in its forecast sufficient staff time to properly support CS-GT rollout, including procurement and customer enrollment, in anticipation of receiving successful project bids in its next solicitation.

### 2023 CS-GT ME&O Forecast

As noted above, to date MCE has no CS-GT generation cost delta or bill discount forecasts to accompany the ME&O costs. As detailed in the accompanying ME&O plan for 2023 (Appendix B) MCE anticipates incurring ME&O costs in 2023 to prepare for potential program enrollment in 2024, as it will continue to work to identify qualifying projects to participate in CS-GT. As discussed above and illustrated in Table 2 below, the delay in launching CS-GT has significantly reduced MCE's actual costs for ME&O incurred in 2021, but has shifted some of these costs forward into the 2023 forecast.

Finally, CS-GT's program design allows for financial support of community sponsors, which MCE has included in its 2023 budget forecast in anticipation of securing a qualifying project. These factors all contribute to a CS-GT ME&O forecast in excess of the established 4% cap.

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<sup>7</sup> Per Resolution E-5124, MCE's capacity allocation for DAC-GT is 4.646 MW.

<sup>8</sup> Per Resolution E-5124, MCE's capacity allocation for CS-GT is 1.2825 MW.

#### **4. BUDGET RECONCILIATION FOR PY 2021**

MCE submitted a budget forecast for PY 2021 as an attachment to its Implementation AL 42-E which was filed with the Commission on May 7, 2020. Due to delays in the AL approval process, MCE did not launch the DAC-GT and CS-GT programs in 2020 as originally expected. As such, and as noted in MCE's 2022 ABAL, MCE is now considering 2021 to be its first program year. The table below shows the forecasted and actual costs for PY 2021 per budget line item, as well as the true-up amount that will be carried forward to future program years.

Table 2: MCE Budget Reconciliation for PY 2021

Category	DAC-GT			CS-GT		
	Forecast	Actual	True-up	Forecast	Actual	True-up
Generation Cost Delta	\$ 379,234	\$ 151,027	\$ 228,207	\$ -	\$ -	\$ -
20% Bill Discount	\$ 162,850	\$ 60,489	\$ 102,361	\$ -	\$ -	\$ -
<b>Program Administration</b>						
Program Management	\$ 93,000	\$ 24,060.80	\$ 68,939	\$ 125,400	\$ 7,619	\$ 117,781
Information Technology	\$ 44,197	\$ 697.95	\$ 43,499	\$ 24,053	\$ 698	\$ 23,355
Billing Operations	\$ 34,325	\$ 2,791.80	\$ 31,533	\$ 9,475	\$ 2,792	\$ 6,683
Regulatory Compliance	\$ 6,480	\$ 5,184.00	\$ 1,296	\$ 6,480	\$ 4,806	\$ 1,674
Procurement	\$ 14,545	\$ 12,447.00	\$ 2,098	\$ 19,945	\$ 8,910	\$ 11,035
CCA Integration Costs	\$ 12,856	\$ 15,556.00	\$ (2,700)	\$ 1,263	\$ -	
<b>Subtotal Program Administration</b>	<b>\$ 205,403</b>	<b>\$ 60,738</b>	<b>\$ 144,666</b>	<b>\$ 186,617</b>	<b>\$ 24,825</b>	<b>\$ 160,529</b>
<b>Marketing, Education &amp; Outreach</b>						
Labor Costs	\$ 43,740	\$ 4,239	\$ 39,501	\$ 14,364	\$ 2,741	\$ 11,624
Outreach and Material Costs	\$ 7,000	\$ 375	\$ 6,625	\$ 21,550	\$ -	\$ 21,550
Local CBO/ Sponsor Costs	\$ -	\$ -	\$ -	\$ 20,000	\$ -	\$ 20,000
<b>Subtotal ME&amp;O</b>	<b>\$ 50,740</b>	<b>\$ 4,614</b>	<b>\$ 46,126</b>	<b>\$ 55,914</b>	<b>\$ 2,741</b>	<b>\$ 53,174</b>
<b>Total</b>	<b>\$ 798,227</b>	<b>\$ 276,867</b>	<b>\$ 521,360</b>	<b>\$ 242,531</b>	<b>\$ 27,565</b>	<b>\$ 213,702</b>

## 5. 2023 BUDGET REQUEST

Based on the budget forecast for PY 2023 presented in Section 2 and the budget reconciliation for PY 2021 presented in section 4, MCE is requesting a total budget of \$1,103,237 for the DAC-GT and CS-GT programs in this budget AL.

*Table 3: MCE Budget Request for PY 2023*

	DAC-GT	CS-GT	Total
Budget Carry-over from PY 2021	\$ 521,360	\$ 213,702	\$ 735,062
Budget Forecast for PY 2023	\$ 1,538,160	\$ 300,139	\$ 1,838,299
<b>TOTAL</b>	<b>\$1,016,800</b>	<b>\$86,437</b>	<b>\$ 1,103,237</b>

## 6. PROGRAM CAPACITY AND ENROLLMENT NUMBERS

MCE reports existing program capacity and customer enrollment numbers for PY 2021 in Table 4 below. In PY 2021, enrolled customers were served with an interim solar resource, as discussed above.

*Table 4: Program Capacity and Enrollment Count for DAC-GT and CS-GT for PY 2021*

Category	DAC-GT	CS-GT
Existing program capacity (MW)	4.646	0
Participating customers (#)	3,081	0

In Table 5, MCE reports forecasted capacity and customer enrollment for PY 2023. As noted above, MCE is currently in contract negotiations for a new solar project to support DAC-GT, and conservatively estimates that the new project will come online in late 2023 or early 2024. However, having received no qualifying bids for CS-GT projects in 2021, MCE does not anticipate launching a CS-GT program and enrolling customers until 2024.

*Table 5: Forecasted Program Capacity and Enrollment Count for DAC-GT and CS-GT for PY 2023*

Category	DAC-GT	CS-GT
Estimated capacity to be procured (MW)	4.646	0
Estimated customer enrollment (#)	3,052	0