



ADVICE LETTER SUMMARY



ENERGY UTILITY

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

Company name/CPUC Utility No.: Marin Clean Energy (MCE)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Amulya Yerrapotu

Phone #: 415-464-6664

E-mail: averrapotu@mccleanenergy.org

E-mail Disposition Notice to: averrapotu@mccleanenergy.org

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 82-E

Tier Designation: 2

Subject of AL: Marin Clean Energy's Disadvantaged Communities Green Tariff Program Tariff Updates and Community Solar Green Tariff Program Closure

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 #: D.24-05-065,

Does AL replace a withdrawn or rejected AL?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

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information:

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

Resolution required? Yes No

Requested effective date: 10/27/24

No. of tariff sheets: 3

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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: ELECTRIC SCHEDULE DAC-GT DISADVANTAGED COMMUNITIES GREEN TARIFF PROGRAM

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

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

Contact Name: Amulva Yerrapotu
Title: Policy Analyst
Utility/Entity Name: Marin Clean Energy

Telephone (xxx) xxx-xxxx: (925) 378-6729
Facsimile (xxx) xxx-xxxx:
Email: ayerrapotu@mcecleanenergy.org

Contact Name: MCE Regulatory
Title: Regulatory Account
Utility/Entity Name: Marin Clean Energy

Telephone (xxx) xxx-xxxx: N/A
Facsimile (xxx) xxx-xxxx: N/A
Email: regulatory@mcecleanenergy.org

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
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	



September 27, 2024

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

MCE Advice Letter 82-E

RE: Marin Clean Energy’s Disadvantaged Communities Green Tariff Program Tariff Updates and Community Solar Green Tariff Program Closure

In compliance with California Public Utilities Commission’s (“CPUC” or “Commission”) Decision (“D.”) 24-05-065,¹ Marin Clean Energy (“MCE”) respectfully submits this Advice Letter (“AL”) for approval of its updated Disadvantaged Communities Green Tariff (“DAC-GT”) tariff and to close the Community Solar Green Tariff program (“CSGT”).

PURPOSE

Pursuant to D.24-05-065, MCE submits this Tier 2 AL to close its CSGT program and update its DAC-GT tariff to reflect the changes established in D.24-05-065 Ordering Paragraphs (“OP”) 2 and 3. MCE makes the following updates to the CSGT program tariff in accordance with OP 2:

1. CSGT is discontinued. MCE will transfer all remaining capacity assigned to this tariff—1.28 MW—to the modified DAC-GT program. MCE has not procured CSGT capacity to date and has no active CSGT solicitation. MCE does not have any enrolled CSGT customers. As such, MCE modifies the existing CSGT tariff to close the program.

MCE makes the following updates to the DAC-GT program tariff in accordance with OP 3:

1. Site requirements are revised to allow eligible projects to be located no more than five miles from eligible disadvantaged communities census tracts;
2. Voluntary inclusion of storage is permitted; and
3. Program administrators shall implement automatic enrollment as previously adopted in D.20-07-008² and Resolution E-5124³.

MCE includes herein proposed modifications to its DAC-GT and CSGT tariffs. Pursuant to OP 9, MCE also explains 1) how the modified program will continue to result “in incremental new renewable energy being purchased to specifically serve subscribers...” of the DAC-GT tariff and

¹ Decision 24-05-065, *DECISION MODIFYING GREEN ACCESS PROGRAM TARIFFS AND ADOPTING A COMMUNITY RENEWABLE ENERGY PROGRAM*, from June 8, 2024, OP 9.

² Decision 20-07-008, *Decision Implementing Automatic Enrollment of Disadvantaged Communities Green Tariff*

³ Resolution E-5124, pg 31

2) how the program administrators coordinated to ensure consistency across DAC-GT tariff updates.

TIER DESIGNATION

Pursuant to D.24-05-065 OP 9, this AL is submitted with a Tier 2 designation.

EFFECTIVE DATE

Pursuant to G.O. 96-B, MCE requests that this Tier 2 AL become effective on October 27, 2024, which is 30 calendar days from the date of this filing.

BACKGROUND

On June 21, 2018, the Commission approved D.18-06-027, adopting two new community solar programs to promote the use of renewable generation among residential customers in DACs,⁴ 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 utility bill.

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.⁵ 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.

On June 7, 2024, the CPUC issued D.24-05-065, discontinuing the CS-GT program and approving several modifications to the DAC-GT program. The DAC-GT program modifications pertaining to CCA program administrators include: modifying project siting requirements, increasing program capacity, allowing the voluntarily inclusion of storage in projects, ordering the cost containment cap to be updated, instituting automatic enrollment, changing the budget advice letter deadline to April 1st, and removing the Green-e certification requirement. MCE submits this Tier 2 advice letter pursuant to OP 9 to update its DAC-GT tariff sheet to comply with the modifications made by OP 3, and to close the CS-GT program to comply with OP 2.

⁴ DACs were 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. The Commission issued Resolution E-5212 on October 6, 2022, which modified the definition of eligible DACs for the programs and expanded eligibility to California tribal lands. Now, eligible communities include both any DAC in CES version 3.0 or later, or California tribal lands.

⁵ D.18-06-027, p. 104, OP 17.

SUMMARY OF PROGRAM CHANGES

1. CSGT Changes

In compliance with D.24-05-065, MCE closes the CS-GT program to future procurement or enrollment. MCE will roll the program's unused capacity—1.28 MW—into the modified DAC-GT program. MCE does not have any enrolled customers in the program and therefore has no CS-GT customers to transition to the modified DAC-GT program. MCE has closed its CS-GT solicitation and informed both project developers and potential community sponsors that the program is closed.

2. DAC-GT Changes

In compliance with D.24-05-065, MCE makes the following changes to the DAC-GT Program Tariff:

1. Replace language stating that “customers receive 100% solar energy” with the following: “customers receive 100% renewable energy from a qualified facility;
2. Add the following definition for qualified facility: "Qualified Facilities are defined as new Renewable Portfolio Standard (RPS) eligible generating facilities or RPS-eligible generating facilities with paired storage with a nameplate rated generating capacity between 500 kW to 20 MW that are located within or no more than 5 miles from a disadvantaged community (DAC) in Pacific Gas and Electric Company's (“PG&E”) service territory;” and
3. Modify language regarding program enrollment to read: "Eligible customers will be automatically enrolled under the rate until customer subscriptions reach MCE's DAC-GT program cap. If program capacity becomes available due to customer churn, MCE will enroll eligible customers until customer subscriptions reach the program cap again."

As detailed in MCE's implementation plan and approved by Resolution E-5124, MCE will procure new renewable energy resources specifically to serve DAC-GT subscribers. This will continue to be the case under the modified DAC-GT program. As ordered in E-5124, MCE will submit executed PPAs under the DAC-GT program to the CPUC as a Tier 2 advice letter. These PPA submissions will include sufficient detail to ensure that the proposed projects are new incremental resources.

Per OP 9 of the Decision, MCE participated in a meeting held on August 20, 2024 with the Program Administrators, consisting of the Investor-Owned Utilities and participating CCAs. The Program Administrators met to coordinate and, to the extent possible, ensure DAC-GT/CSGT tariff uniformity across the state. Following the meeting, the Program Administrators continued to communicate via email on planned DAC-GT/CSGT tariff updates prior to the submission of the

Advice Letters.

MCE submits the following Appendix to make the required changes to its program documents:

- Appendix A: Electric Schedule DAC-GT and Redline of Electric Schedule DAC-GT

CONCLUSION

MCE respectfully requests the Commission approve the modifications to its DAC-GT tariff sheet as described herein.

NOTICE

In accordance with General Rule 4 of GO 96-B, MCE is serving copies of this AL to the interested parties shown on the R.14-07-002 and A.22-05-022 service lists. For changes to these service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Pursuant to the March 20, 2020, order from the Executive Director waiving the hard copy filing requirements for the AL pursuant to GO 96-B Rule 1.3, MCE will not be filing a hard copy of this AL.

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

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

Amulya Yerrapotu
Policy Associate
Marin Clean Energy
1125 Tamalpais Ave
San Rafael, CA 94901
Email: ayerrapotu@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 Amulya Yerrapotu at (415) 464-6664 or by electronic mail at ayerrapotu@mcecleanenergy.org.

/s/ Amulya Yerrapotu

Amulya Yerrapotu
Policy Analyst
MARIN CLEAN ENERGY
1125 Tamalpais Avenue
San Rafael, CA 94901
Email: ayerrapotu@mcecleanenergy.org

Appendices

Appendix A: Electric Schedule DAC-GT and Redline of Electric Schedule DAC-GT

cc: Service Lists R.14-07-002 and A.22-05-022

APPENDIX A



ELECTRIC SCHEDULE DAC-GT

DISADVANTAGED COMMUNITIES GREEN TARIFF PROGRAM

Effective Date: October 27, 2024

APPLICABILITY

The Disadvantaged Communities Green Tariff (“DAC-GT”) is a voluntary rate supplement to the customer’s otherwise applicable rate schedule (“OAS”) under which eligible customers have their electricity usage met with 100% renewable energy from a qualified facility based on their actual usage each month while also receiving a 20% discount on their OAS. Qualified Facilities are defined as new Renewable Portfolio Standard (“RPS”) eligible generating facilities or RPS-eligible generating facilities with a nameplate rated generating capacity between 500 kW to 20 MW and paired storage that are located within or no more than 5 miles from a disadvantaged community (“DAC”) in Pacific Gas and Electric Company’s (“PG&E”) service territory.

To enroll under the rate, a customer must meet the following eligibility requirements:

- Customers must receive electric generation service from MCE;
- Customer must be on a residential rate;
- Customer must meet the income eligibility requirements for the California Alternate Rates for Energy (“CARE”) or Family Electric Rate Assistance (“FERA”) programs;
- The customer’s service address must be located in a DAC. DACs are defined as communities that are identified in the CalEnviroScreen (CES) 3.0 tool (and any subsequent version of CalEnviroScreen) as among the top 25 percent of census tracts statewide, plus the census tracts in the highest five percent of CES’ Pollution Burden that do not have an overall CES score because of unreliable socioeconomic or health data.
 - Alternatively, the customer’s service address must be located in California Indian Country as defined in 18 United States Code Section 1151, with the exception of privately held in-holdings. Privately held in-holdings are defined as non-Indian owned land located within the exterior boundaries of California Indian Country. In the event of multiple owners, such land shall be considered Indian-owned if at least one owner is a tribe or tribal member, regardless of the use of the land.

Service accounts enrolled under the following programs and services are ineligible to enroll under the DAC-GT rate:

- Standby service;
- Net energy metering (NEM) rates;
- Non-metered service;
- Rates that are not CARE- or FERA-eligible;
- Non-residential rates;
- Master-metered customers;

Eligibility of customers is verified at the level of the Service Agreement ID (SA ID).

ENROLLMENT TERMS

Enrollment of customers under Schedule DAC-GT occurs at the level of the SA ID. Customer enrollment is capped at a maximum of 2 MW solar equivalent per SA ID.

Eligible customers will be automatically enrolled in the program until customer subscriptions reach MCE's DAC-GT program cap. Once MCE reaches its program cap, a wait list will be maintained for new subscriptions. If program capacity becomes available due to customer churn, MCE will enroll eligible customers until customer subscriptions reach the program cap again.

A participating customer may be enrolled in the program for 20-years, or until there are not sufficient dedicated resources to support the program, whichever happens first. There is no contract required when enrolling in the DAC-GT program. Customers may enroll for any number of months, and there is no enrollment or cancellation fee. Cancellation of a customer's participation will become effective on the next meter read date; cancellations made within five (5) business days of the next meter read date may not be changed for an additional billing cycle.

A customer's service under this schedule is portable within MCE electric service area as long as the customer continues to live in a DAC as defined under the program and continues to meet all other eligibility requirements. If the customer is found to still be eligible, MCE retains their status as a program participant and does not require the customer to go on a waitlist, as long as the customer's turn-on date at the new location is within 90 days of their final billing date at their original location.

Customers who, after enrollment into the DAC-GT Program, become ineligible for CARE or FERA will be de-enrolled from the DAC-GT program.

RATES

Customers taking service on this tariff schedule will receive a twenty (20) percent discount on the electric portion of the bill compared to their OAS. The discount applies as long as customers are enrolled under the programs and they comply with all the eligibility and enrollment terms.

For low-income customers enrolled in the CARE or FERA programs, the OAS is the customer's existing CARE or FERA rate. Accordingly, the 20% discount for these customers will be applied to low-income customer bills after the CARE/FERA discount has been applied.

For customers who are not enrolled in CARE or FERA programs, the OAR is the customer's existing rate schedule before program enrollment. Residential customer SA IDs that are already enrolled in

MCE's 100% renewable energy generation service option (i.e., MCE's "Deep Green" rate) when enrolling under the programs, will be defaulted to MCE's base rate (i.e., MCE's "Light Green" rate) for the purposes of calculating the 20 percent discount.

BILLING

Monthly bills are calculated in accordance with the customer's OAS and the provisions contained herein. The amount credited under Schedule DAC-GT is provided by both PG&E and MCE: MCE calculates the twenty (20) percent discount for the generation portion of the electric bill and PG&E calculates the twenty (20) percent discount for the delivery portion of the electric bill.

Both entities display the discount on their respective portion of the customer's utility bill.

METERING

All customers must be metered according to the requirements of their OAS.



ELECTRIC SCHEDULE DAC-GT

DISADVANTAGED COMMUNITIES GREEN TARIFF PROGRAM

Effective Date: ~~Upon Commission Approval~~ October 27, 2024

APPLICABILITY

The Disadvantaged Communities Green Tariff (~~("DAC-GT")~~) is a voluntary rate supplement to the customer's otherwise applicable rate schedule (~~("OAS")~~) under which eligible customers have their electricity usage met with 100% ~~solar~~ renewable energy from a qualified facility based on their actual usage each month while also receiving a 20% discount on their OAS. Qualified Facilities are defined as new Renewable Portfolio Standard ("RPS") eligible generating facilities or RPS-eligible generating facilities with a nameplate rated generating capacity between 500 kW to 20 MW and paired storage that are located within or no more than 5 miles from a disadvantaged community ("DAC") in Pacific Gas and Electric Company's ("PG&E") service territory.

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- Customers must receive electric generation service from MCE;
- Customer must be on a residential rate;
- Customer must meet the income eligibility requirements for the California Alternate Rates for Energy (~~("CARE")~~) or Family Electric Rate Assistance (~~("FERA")~~) programs;
- The customer's service address must be located in a ~~disadvantaged community (DAC)~~. DACs are defined as communities that are identified in the CalEnviroScreen (CES) 3.0 tool (and any subsequent version of CalEnviroScreen) as among the top 25 percent of census tracts statewide, plus the census tracts in the highest five percent of CES' Pollution Burden that do not have an overall CES score because of unreliable socioeconomic or health data.

- ~~The~~ Alternatively, the customer's service address must be located in California Indian Country as defined in 18 United States Code Section 1151, with the exception of privately held in-holdings. Privately held in-holdings are defined as non-Indian owned ~~fee~~ land located within the exterior boundaries of California Indian Country. In the event of multiple owners, such land shall be considered Indian-owned if at least one owner is a tribe or tribal member, regardless of the use of the land.

Service accounts enrolled under the following programs and services are ineligible to enroll under the DAC-GT rate:

- Standby service;
- Net energy metering (NEM) rates;
- Non-metered service;
- Rates that are not CARE- or FERA-eligible;
- Non-residential rates;
- Master-metered customers;
- ~~Customers enrolled in Community Solar Green Tariff (CS-GT) rate schedule.~~

Eligibility of customers is verified at the level of the Service Agreement ID (SA ID).

ENROLLMENT TERMS

Enrollment of customers under Schedule DAC-GT occurs at the level of the SA ID. Customer enrollment is capped at a maximum of 2 MW solar equivalent per SA ID. ~~This limitation does not apply to a federal, state, or local government, school or school district, county office of education, the California Community Colleges, the California State University, or the University of California.~~

Eligible customers ~~may enroll under~~ will be automatically enrolled in the ~~rate on a first-come, first-served basis~~ program until customer subscriptions reach MCE's DAC-GT program cap. Once MCE reaches its program cap, a wait list will be maintained for new subscriptions. ~~When~~ If program capacity becomes available due to customer churn, MCE will ~~continue enrolling~~ enroll eligible customers ~~either from the waitlist (if applicable), or on a first-come, first-served basis up to until customer subscriptions reach~~ the program cap: again.

~~The customer will be placed on the DAC-GT rate on the first day of the next billing cycle where the billing cycle start date occurs at least five (5) business days after the date of the customer's request. A customer request that is received within five (5) business days of the customer's next billing cycle may result in the customer being placed on the DAC-GT rate in the following billing cycle.~~

A participating customer ~~can remain on~~ may be enrolled in the ~~DAC-GT tariff~~ program for ~~up to 20-- years from the time of enrollment, or until there are not sufficient dedicated resources to support the program, whichever happens first~~. There is no contract required when enrolling in the DAC-GT program. Customers may enroll for any number of months, and there is no enrollment or cancellation fee. Cancellation of a customer's participation will become effective on the next meter read date; cancellations made within five (5) business days of the next meter read date may not be changed for an additional billing cycle.

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RATES

Customers taking service on this ~~rate~~tariff schedule will receive a twenty (20) percent discount on the electric portion of the bill compared to their OAS. The discount applies as long as customers are enrolled under the programs and they comply with all the eligibility and enrollment terms.

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