

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

03/15/22
04:59 PM
A1201008

Application of San Diego Gas & Electric
Company (U 902 E) For Authority To
Implement Optional Pilot Program To
Increase Customer Access To Solar
Generated Electricity.

Application No. 12-01-008
(Filed January 17, 2012)

And Related Matters.

Application No. 12-04-020
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**ANNUAL GTSR PROGRAM PROGRESS REPORT OF SAN DIEGO GAS &
ELECTRIC COMPANY (U 902 E) FOR ACTIVITIES OCCURRING IN 2021**

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March 15, 2022

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**ANNUAL GTSR PROGRAM PROGRESS REPORT OF SAN DIEGO GAS &
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Pursuant to Decision (“D.”) 15-01-051 (“Decision”), San Diego Gas & Electric Company (“SDG&E”) files this annual progress report of its activity during the 2021 calendar year. The Decision requires the participating utilities to file an annual Green Tariff Shared Renewables (“GTSR”) Program Progress Report¹ every March 15 starting in 2016; the ending date was then removed by Senate Bill 840, enacted September 2016, which extended the operation of the program indefinitely. Resolution E-5028 made minor changes to the components of this GTSR Annual Program Progress Report, most notably removing the annual marketing report and moving it to the Marketing Implementation Advice Letter (“MIAL”),² as well as attaching the Annual GTSR 20-Year Forecast.³ This report includes the following components:

- Enrollment reporting, including “available capacity” data at the most detailed level feasible, updated monthly, with the precision of the information increasing over time;

¹ Decision, Ordering Paragraph (“OP”) 10 at 182.

² *Id.*, OP 6 at 180; Resolution E-5028, OP 6 at 50 and Appendix 1.

³ Resolution E-5028, OP 6 at 50 and Appendix 1.

- A one-page summary tracking the amount and cost of generation transferred between the Renewables Portfolio Standard (“RPS”) and GTSR Programs;
- A summary of GTSR revenue and costs;
- A summary of advisory group or advising network activities, including information regarding frequency of meetings, topics discussed, and any other relevant information;
- A Community Choice Aggregation (“CCA”) Code of Conduct report, including a summary of marketing or lobbying efforts that are, or could reasonably be interpreted to be, subject to the CCA Code of Conduct;
- Supplier diversity activity;
- A summary of California Alternative Rates for Energy (“CARE”) enrollment, including location of CARE customers in relation to areas eligible for environmental justice (“EJ”) projects or planned EJ projects;
- Reports of fraud or misleading advertisements received through meetings with the advisory group or advising network; and
- If available, customer profile information and a summary of enrollment figures for low-income customers and subscribers who speak a language other than English at home.

SDG&E hereby submits its annual GTSR Program Progress Report for activities occurring in 2021.

I. 2021 AVAILABLE CAPACITY DATA

The Decision sets a target capacity for SDG&E’s collective GTSR Program of 59 megawatts (“MW”), with 10 MW reserved for EJ facilities and a 10 MW goal for residential

customers.⁴ EJ facilities are defined as no larger than 1 MW and located in “the most impacted and disadvantaged communities” as identified by CalEPA.⁵ Table 1 below presents the solar capacity procured specifically for the Green Tariff (“GT”) and Enhanced Community Renewables (“ECR”) components of the GTSR Program.⁶ SDG&E held a GTSR solicitation in August 2021 but did not receive any bids; thus, no new projects were added to serve either the GT or the ECR components.

Table 1. GTSR Procurement Totals as of 12/31/21 (all values in MW)

Category	Target Capacity	GT Procured to Date	ECR Procured to Date	Capacity Remaining
Unrestricted Sources	49	40	0	9
EJ Reservation	10	0	0	10
Totals	59	40	0	19

Customer enrollment data for the GTSR Program is presented in Table 2 below, showing 2021 subscribed generation capacity for the GT and ECR components by month.

As of the beginning of 2021, commercial customers had subscribed to 46.07 MW of GT Program capacity. Prior to 2021, GTSR customers received either a bill credit or paid a low premium, in terms of dollars per kilowatt-hour (“\$/kWh”), when participating in the program. Comparatively, GT rates increased significantly in March 2021, resulting in a substantial number of participating customers opting out of the program. SDG&E expects participation in the GT component to continue to decline due to increasing load departure to Community Choice Aggregators and as customers choose to terminate their enrollment in the GT component to

⁴ Decision at 4-7.

⁵ *Id.* at 51.

⁶ SDG&E markets the GT component of GTSR as EcoChoiceSM and the ECR component as EcoShareSM.

avoid its exceptionally high rates. This decline is explained in detail in Advice Letter (“AL”) 3920-E.⁷

Table 2. 2021 GTSR Customer Enrollment Summary (all values in MW)

Month	GT Subscribed Capacity	ECR Subscribed Capacity
January	51.12	0
February	45.41	0
March	27.42	0
April	25.78	0
May	26.00	0
June	5.59	0
July	5.73	0
August	5.66	0
September	5.55	0
October	5.38	0
November	5.27	0
December	5.17	0

The GT component of SDG&E’s GTSR program opened for enrollment in November 2016. GT Subscribed Capacity is calculated using 12 months of historical energy usage at the time of customer enrollment and the applicable GT subscription level for each enrolled customer. In conjunction with the weighted average capacity factor for all projects included in SDG&E’s

⁷ SDG&E filed this advice letter December 17, 2021, seeking to suspend SDG&E’s GTSR programs. SDG&E Advice Letters can be found at:

<https://www.sdge.com/rates-and-regulations/tariff-information/advice-letters>.

Interim Pool,⁸ the sum of customer purchased renewable energy is converted into an equivalent amount of renewable generation (*i.e.*, Subscribed Capacity).⁹

In instances where newly subscribed customers do not have 12 months of historical energy usage, a customer's average monthly energy consumption is calculated and used to estimate the amount of energy the customer is likely to consume over a 12-month period. As historical usage for newly subscribed customers becomes available, it will be reflected in the quarterly reporting resulting in a more precise estimate of GT Subscribed Capacity over time. The ECR component of SDG&E's GTSR Program did not have any subscribed capacity in 2021. SDG&E held one GTSR solicitation in 2021 focused on adding ECR capacity but did not receive any bids. As noted above, SDG&E filed AL 3920-E on December 17, 2021 to suspend the GTSR program for the reasons stated in the advice letter.

II. GENERATION TRANSFERRED BETWEEN RPS AND GTSR

Customers enrolled in the GT component of SDG&E's GTSR Program purchased 19,821 megawatt-hours ("MWh") of renewable generation from the GT Interim Pool in 2021. Costs associated with this generation totaled \$1,860,665 and were calculated by multiplying the purchased renewable generation by the cost per MWh of charges associated with:

- Generation from the GT Interim Pool based on the weighted average contract price of participating facilities;
- Western Renewable Energy Generation Information System ("WREGIS"); and
- CAISO Grid Management Charges ("GMC").

⁸ SDG&E's Interim Pool includes RPS qualifying solar facilities with existing power purchase agreements that meet the requirements specified in the Decision.

⁹ Advice Letter 2853-E, (approved March 2, 2016 and effective March 5, 2016) specifies the facilities currently included in SDG&E's Interim Pool.

III. REVENUE AND COSTS

In 2021, SDG&E incurred \$205,154 in non-commodity expenses related to administering and implementing the GTSR program. Administration expenses are split between information technology and program management. Expenses were also incurred in 2021 for marketing, education, and outreach. Table 3 summarizes non-commodity expenses by category; revenues are summarized in Table 4.

Table 3. 2021 GTSR Expenditure Summary (non-commodity)¹⁰

Memorandum Account	SDG&E Internal Order	Description	2021 Expenditures	Program to date Expenditures
GTSR Administrative Costs Memorandum Account (“GTSRACMA”)	7078688	GT Information Technology	\$0	\$1,253,377
	7078689	ECR Information Technology	\$0	\$553,763
	7078690	GT Program Management	\$139,542	\$629,990
	7078691	ECR Program Management	\$24,021	\$279,308
GT Marketing, Education, & Outreach Memorandum Account (“GTME&OMA”)	7078692	GT Marketing and Outreach	\$41,591	\$524,354
ECR Marketing, Education, & Outreach Memorandum Account (“ECRME&OMA”)	7078693	ECR Marketing and Outreach	\$0	\$2,828
Total			\$205,154	\$3,243,620

¹⁰ In 2021, interest was booked to the GTSR Program memorandum accounts as follows:

GTSRACMA	GTME&OMA	ECRME&OMA	GTSRBA
\$1,081	\$25	\$0	\$2,649

Table 4. 2021 GTSR Revenue Summary (non-commodity)

Memorandum Account	2021 Revenue	Total Revenue
GTSRACMA	\$130,578	\$1,300,248
GTME&OMA	\$138,479	\$604,398
ECRME&OMA	\$0	\$0
Total	\$269,057	\$1,904,646

Commodity-related revenues and expenses for the GT and ECR components are recorded in the Green Tariff Shared Renewables Balancing Account (“GTSRBA”). In calendar year 2021, expenses were \$85,669 higher than revenues collected, adding to the program-to-date undercollection. The full \$85,669 is in the GT rate and is broken down by subaccount in Table 5. The 2021 under collection shown below is largely the result of an unexpected delay to the commercial operation date of SDG&E’s second dedicated GT contract, which resulted in additional commodity expenses during 2021.

Table 5. 2021 GTSRBA Summary

Account	2021 Revenue	2021 Expenses	2021 (Over) / Under Collection
GT Subaccount	\$3,324,988	\$3,410,657	\$85,669
ECR Subaccount	\$0	\$0	\$0
Total	\$3,324,988	\$3,410,657	\$85,669

IV. SUMMARY OF ADVISORY GROUP ACTIVITIES

The Decision requires a summary of advisory group activities or consultation with community-based organizations, if any.¹¹ As noted above, SDG&E filed AL 3920-E to suspend the GTSR program and as such, SDG&E has no Advisory Group activity to report for the 2021 calendar year.

¹¹ Decision at 141.

SDG&E conducted outreach and engagement through a wide network of partnerships and Community Based Organizations (“CBOs”), as well as customer relationship management through our team of Account Executives. Outreach efforts primarily included emails and customer phone calls. These partners communicated through their broad network of affiliations to provide information on an as needed basis. Outreach activities included:

- Energy Solutions Partner Network: The Outreach team leveraged partnerships within its established network of more than 200 CBOs to promote the program, where applicable. Outreach channels utilized include events, presentations, and messaging through online and social media channels. Due to COVID-19, most in-person events were cancelled for the year to comply with social distancing guidelines.
- Chambers, Business, and Trade Association Collaboration Packages: As part of its Energy Solutions Partner Network, SDG&E has established partnerships with over 50 chambers of commerce, economic development organizations, business improvement districts, and trade associations. These groups help to proactively engage customers on topics related to GTSR through events, presentations, and messaging through online and social media channels.
- Account Executive Engagement: SDG&E’s Account Executives serve as the primary point of contact and manage relationships with many large commercial and industrial customers. This includes educating them on programs and services available, including GTSR. Account Executives regularly met with customers and provided guidance and bill analysis.

SDG&E will continue to gauge customer interest in GTSR programs. However, due to increases in both the cost of participation and customer choice options in SDG&E's service territory, SDG&E believes suspension of the program is the best next step.

V. CCA CODE OF CONDUCT REPORT

SDG&E's 2021 marketing and outreach activities were consistent with the CCA Code of Conduct, D.15-01-051, and Resolution E-4734.

VI. SUPPLIER DIVERSITY

In 2021, SDG&E had no procurement from diverse business enterprises ("DBEs") for the GTSR program. SDG&E encourages DBEs, as defined in General Order 156, to participate in all solicitations. SDG&E has dedicated representatives to provide information to DBEs and assist them in the DBE process. When companies express an interest to participate in a solicitation, SDG&E tracks whether that company is a DBE and follows up to invite them to future solicitations. In addition, SDG&E makes a significant effort to highlight the importance of DBEs in its bidder's conferences.

VII. SUMMARY OF CARE ENROLLMENT

In 2021, 684 CARE customers enrolled in the GT portion of SDG&E's GTSR program. These customer service points have been cross referenced with the 20% most impacted communities identified using the California Environmental Protection Agency's CalEnviroScreen 3.0 and newer. Out of those 648 CARE customers, 85 are located in areas that are also eligible for an EJ project, as defined in the Decision.¹²

¹² Decision at 51-52.

VIII. REPORTS OF FRAUD OR MISLEADING ADVERTISEMENT

SDG&E has neither received any reports of fraud or misleading advertising concerning the GTSR Program during 2021, nor is SDG&E aware of any such practices at this time. As stated on the ECR website at www.sdge.com/EcoShare, customers wishing to report such activates can contact SDG&E at 1-800-411-7343 or CTTS@sdge.com.

IX. CUSTOMER PROFILE INFORMATION

In 2021, as also mentioned above in Section VIII, 648 customers enrolled in the GT component were identified as CARE, indicating that they are low-income. SDG&E also records whether residential customers signing up for rates speak a language other than English at home. Through 2021, SDG&E's residential GT customers were found to fall into the following categories: 94.6% English speaking, 1.6% Spanish speaking, and 3.8% unknown. As stated, the ECR component had no enrollment through 2021, as there are no developers with an active ECR Project. Thus, SDG&E has not collected this profile information on ECR participants.

X. REGULATORY ACTIVITY

Section I briefly outlines the challenges that the GTSR Program experienced in 2021 and will continue to experience going forward. In response to these challenges, SDG&E filed Advice Letter 3920-E on December 17, 2021, to suspend the GTSR program.¹³ The Advice Letter details the reasons for the suspension.

¹³ SDG&E Advice Letters can be found at:

<https://www.sdge.com/rates-and-regulations/tariff-information/advice-letters>

SDG&E requests that the Commission accept this annual progress report.

Respectfully submitted,

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March 15, 2022