



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

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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.

A.12-01-008
(Filed January 17, 2012)

And Related Matters.

A.12-04-020
(Filed April 24, 2012)

A.14-01-007
(Filed January 10, 2014)

**2021 ANNUAL GREEN TARIFF SHARED RENEWABLES PROGRAM
REPORT OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

ASHLEY E. MERLO

Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (925) 200-5819
Facsimile: (415) 973-5520
E-Mail: Ashley.Merlo@pge.com

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: March 14, 2022

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REPORT OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

Pursuant to Ordering Paragraph 10 of Decision 15-01-051, Pacific Gas and Electric Company (“PG&E”) files this annual report on Green Tariff Shared Renewables (“GTSR”) program. The Annual Report is attached as the Appendix to this pleading and summarizes the period of January 1 – December 31, 2021.

Respectfully submitted,

ASHLEY E. MERLO

By: /s/ Ashley E. Merlo

ASHLEY E. MERLO

Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (925) 200-5819
Facsimile: (415) 973-5520
E-Mail: Ashley.Merlo@pge.com

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

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INTRODUCTION

As directed by Decision (D.) 15-01-051,¹ Pacific Gas and Electric Company (PG&E or the Company) provides the California Public Utilities Commission (CPUC or Commission) and interested parties with this Annual Report of the Green Tariff Shared Renewables (GTSR) Program for the 2021 calendar year. An Interim Annual Report for 2015 was filed on August 17, 2015, and the Annual Report summarizing the full year of 2015 was filed on March 15, 2016. Subsequent Annual Reports for 2016-2020 were filed on March 15 following their respective years.

The GTSR program was approved by the Commission in D.15-01-051. The program enables PG&E bundled electric customers to purchase up to 100 percent of their electricity from small- to mid-sized renewable energy projects located in PG&E's service area. The GTSR program offers customers two options for purchasing renewable energy. The Green Tariff option, offered under the program name "PG&E's Solar Choice" and the tariff "E-GT," gives customers the choice of purchasing either 50% or 100% of their electric usage from a pool of solar projects in PG&E's service territory. The Enhanced Community Renewables (ECR) option, offered under the program name "Regional Renewable Choice" and the tariff "E-ECR," allows customers to purchase up to 100% of their electric usage from specific, newly developed generation projects from which PG&E procures energy.

This report will generally utilize the customer-facing names (Solar Choice and Regional Renewable Choice) for the two GTSR programs, except when referencing regulatory actions pertaining to all three investor-owned utilities.

Except for the Marketing Report, which has been consolidated with the Marketing Implementation Advice Letter per Resolution E-5028², this report includes the following contents as directed by D.15-01-051:

- Enrollment Reporting and Available Capacity
- Generation Transferred Between Renewables Portfolio Standard (RPS) and GTSR Program
- GTSR Revenue and Cost Reporting Summary
- External Advisory Board
- Community Choice Aggregation (CCA) Code of Conduct Report
- Supplier Diversity

¹ Ordering Paragraph (OP) 10

² OP 6

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- California Alternate Rates for Energy (CARE) Enrollments and Environmental Justice (EJ) Projects
- Low Income Customers and Customers Who Speak a Language Other Than English at Home
- Reports of Regional Renewable Choice Fraud or Misleading Advertisements

ENROLLMENT REPORTING AND AVAILABLE CAPACITY

D.15-01-051 set a total capacity for PG&E's GTSR program of 272 megawatts (MW), with 45 MW reserved for facilities of no larger than 1 MW located in areas previously identified by the California Environmental Protection Agency as the most impacted and disadvantaged communities (Environmental Justice or EJ Reservation) and 20 MW reserved for the City of Davis.³ Additionally, SB 43 mandates that 100 MW of the total 600 MW program capacity for all three investor-owned utilities be reserved for participation by residential customers. For PG&E, this residential reservation is set at 45 MW of the GTSR program capacity.

In D.15-01-051, the Commission directed the investor-owned utilities, including PG&E, to initiate advanced procurement for the Green Tariff program.⁴ The Commission set a minimum goal of 50 MW for PG&E with procurement to be completed within one year following the adoption of the Decision. On January 22, 2016, PG&E filed Advice Letter 4780-E, seeking approval of contracts for the Solar Choice program totaling 52.75 MW. The CPUC approved that advice letter effective February 21, 2016.

In D.16-05-006, the Commission ordered the investor-owned utilities to hold one solicitation in 2016 and two solicitations in 2017 for the ECR (Regional Renewable Choice) program.⁵ In accordance with that Decision, PG&E launched its first Regional Renewable Choice solicitation on August 31, 2016. In 2017, PG&E launched two Regional Renewable Choice solicitations, one on April 26, 2017 and the second on September 12, 2017. The 2017 Spring solicitation did not result in any awarded contracts; the 2017 Fall solicitation resulted in one awarded contract. In 2018, PG&E launched two Regional Renewable Choice solicitations, one on August 24, 2018 and the second on November 13, 2018. The 2018 Summer solicitation did not result in any awarded contracts. The 2018 Winter Regional Renewable Choice solicitation was put on hold on March 27, 2019 and resumed on September 26, 2019. PG&E filed an advice letter on February 5, 2021 (AL 6079-E) as part of the Winter 2018 solicitation, through which it obtained approval for two awarded contracts. On October 15, 2020, PG&E launched its Fall 2020 Regional Renewable

³ D.15-01-051, OP 7.

⁴ *Id.*, page 27.

⁵ D.16-05-006, OP 1.

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Choice solicitation. PG&E did not move forward with any offers received in its Fall 2020 solicitation.

PG&E'S PETITION TO MODIFY D. 15-01-051

In the first three months of 2021, there was a significant increase in Solar Choice enrollment due to favorable rates for participants. The increase in enrollment very quickly surpassed PG&E's GTSR dedicated resource pool's capacity. On April 30, 2021, PG&E filed a Petition to Modify D.15-01-051 (Emergency Petition), seeking modification of that decision to allow PG&E to use excess existing renewable resources previously procured separately from its Solar Choice Program to form a temporary borrowed resource pool to meet the needs of the increased Solar Choice customer enrollments.⁶

In response to enrollment growth, PG&E ran a Solar Choice solicitation in Spring 2021 to procure additional capacity. PG&E received 5 total bids from 3 unique projects that were all above the solicitation bid cap. PG&E did not move forward with any of the offers.

In December 2021 the Commission approved PG&E's Emergency Petition in D.21-12-036, which included a requirement to file a Tier 3 Advice Letter (AL) within 15 days of issuance that would establish the borrowed pool of Renewable Portfolio Standard (RPS) resources needed to support the Solar Choice Program⁷. PG&E filed AL 6451-E on December 30, 2021, requesting approval of a borrowed pool of resources.⁸ D.21-12-036 also ordered PG&E to procure an additional 176.15 MW of dedicated resources by the end of 2022, with those resources required to start delivering energy by the end 2024, as well as pause new enrollment until these resources come online, among other directives.

Table 1 presents the capacity procured for the Solar Choice and Regional Renewable Choice components of the GTSR program.

⁶ As stated in PG&E's April 30 Emergency Petition, because of the emergency nature of the need for resources to serve Solar Choice customers, PG&E requested the Commission grant its Emergency Petition by no later than June 2021.

⁷ D.21-12-036 is available online at the following URL: [433096271.PDF \(ca.gov\)](#)

⁸ AL 6451-E is currently pending approval.

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TABLE 1
CUMULATIVE PROCURED RENEWABLE CAPACITY FOR SOLAR CHOICE AND REGIONAL RENEWABLE CHOICE

Category	Available Capacity (MW)	Solar Choice Procured (MW)	Regional Renewable Choice Procured (MW)*	Remaining Capacity (MW)
Unrestricted	207	50.75	3.65	152.60
EJ Reservation	45	2	0	43
City of Davis	20	0	0	20
Totals	272	52.75	3.65	215.60

* The MW procured in Regional Renewable Choice decreased from 5.31 MW to 3.65 MW due to a contract termination.

Table 2 presents GTSR customer enrollment data, showing estimated customer capacity for Solar Choice by customer type, as of December 31 of the year referenced. Enrollment capacity presented in Table 2 is calculated by converting each enrolled customer’s past 12 months of historical usage in the program, where available, to MW using the weighted average capacity factor of the resources currently serving the Solar Choice program. While this is an accurate representation of program capacity, it does not provide timely information about future enrollment capacity as it takes 12 months to fully capture the impact of a newly enrolled customer on enrollment capacity.

Due to a rate change on January 1, 2021, PG&E’s Solar Choice net rate resulted in a “discount” compared to the otherwise applicable tariff for most eligible rate schedules, resulting in rapid enrollment as previously discussed. In 2020, anticipating this possibility, PG&E developed a forward-looking capacity estimation methodology using the past 12 months-usage of all currently enrolled customers, including customers who just recently enrolled. PG&E cannot know if currently enrolled customers will remain enrolled in the program or if their loads will change post-enrollment, but to ensure compliance with statutory program caps, a forward-looking capacity calculation became necessary. Table 3 shows the results of this alternate methodology on a quarterly basis for 2021.

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TABLE 2
CUMULATIVE MEGAWATTS (MW) OF CUSTOMER ENROLLMENT UNDER SOLAR CHOICE

Category	Residential Customers	Non-Residential Customers	Total
2016 Enrolled MW	2.62	5.95	8.57
2017 Enrolled MW	7.74	7.87	15.61
2018 Enrolled MW	10.7	11.3	22
2019 Enrolled MW	6.5	25.3	31.8
2020 Enrolled MW	7.7	26.4	34.1
2021 Enrolled MW	15	174.2	189.2

TABLE 3
ALTERNATE SOLAR CHOICE CAPACITY METHODOLOGY RESULTS (MW)

Category	March 2021	June 2021	Sept 2021	Dec 2021
Residential Customers	13	17.2	17.9	16.7
Non-Residential Customers	202.1	209.8	207.3	196.7
Total	215.1	227.0	225.2	213.3

There was no customer enrollment in the Regional Renewable Choice program in 2021 because there are no Regional Renewable Choice projects online. The first Regional Renewable Choice project was anticipated to come online and begin delivering energy to customers in 2021 but the project developer could not meet its online date requirement and requested termination.

GENERATION FROM SOLAR CHOICE DEDICATED AND BORROWED POOL RESOURCES

During 2021, Solar Choice customers' usage was supported, in part, by the program's dedicated solar resource pool that was procured to serve customers enrolled in the program. As discussed above, PG&E's dedicated resource pool's generation fell short of Solar Choice participant energy usage in 2021. Thus, PG&E filed the aforementioned Emergency Petition to ask for permission to supplement the Solar Choice dedicated resources with a borrowed pool comprised of existing excess Renewable Portfolio Standard (RPS) resources. The approval to use borrowed pool resources was granted in December 2021 and a subsequent Tier 3 Advice Letter

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was filed to provide the Commission a list of the borrowed resource pool that PG&E proposed to utilize on a temporary basis.⁹ Approval of the borrowed pool resources is pending approval. Once the borrowed resource pool list is approved, PG&E will implement appropriate accounting entries for 2021 and year-to-date 2022 in the Green Tariff Shared Renewables Balancing Account (GTRSBA) that will balance the supply from the borrowed resources pool with the excess demand not otherwise served by the existing dedicated resource pool.

Table 4 presents the GTSR Program dedicated solar resources that were online and providing energy to Solar Choice customers throughout 2021, and Table 5 lists the resources that PG&E proposed, in Advice Letter 6451-E, would constitute its borrowed pool:

**TABLE 4
 SOLAR CHOICE DEDICATED SOLAR RESOURCES**

Project Name	MW Capacity
Bakersfield PV 1	5.25 MW
Bakersfield Industrial 1	1 MW
Delano Land 1	1 MW
Manteca Land 1	1 MW
Merced 1	3 MW
Great Valley Solar 4 (previously RE Tranquility 8 Amarillo)	20 MW
Redwood 4 Solar Farm (previously 54KR)	20 MW
Winter Wheat (previously San Joaquin 1B FiT)	1.5 MW
Total Capacity	52.75 MW

**TABLE 5
 PROPOSED PROJECTS FOR BORROWED GTSR POOL:**

Project Name	Actual Contract Operating Date	Capacity (MW)	Expected Generation (MWh)
Shafter Solar – RAM 3	6/3/15	13.15	34,599
Bakersfield 111	7/8/15	1.4	1,960
Fresno Cogeneration - Fresno Solar South	10/20/15	1.5	2,100
Fresno Cogeneration - Fresno Solar West	10/20/15	1.5	2,100
Columbia Solar Energy - RAM 2	10/21/15	19	40,600
Greenlight - Sirius Solar Project	10/22/15	0.999	1,399

⁹ Advice Letter 6451-E was filed on December 30, 2021.

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Morelos del Sol - RAM 3	12/2/15	15	32,630
Woodmere Solar Farm - RAM 4	12/23/15	15	29,998*
ImMODO- Lemoore 1	2/1/16	1.5	2,100
Greenlight - Peacock Solar Project	2/3/16	0.999	1,399
Pristine Sun- 2192 Ramirez	2/11/16	0.5	700
Greenlight - Castor Solar Project	4/7/16	1.5	2,100
CED Corcoran Solar 3, LLC - PV 3	12/1/16	20	49,230
CED Oro Loma Solar Project A - RAM 5	1/26/17	10	25,910
Avenal Solar Project A - RAM 5	1/26/17	7.9	19,710
CED Oro Loma Solar Project B - RAM 5	1/26/17	10	25,910
Avenal Solar Project B - RAM 5	1/26/17	7.9	19,710
Westside Solar, LLC - PV 3	3/13/17	20	55,250
Aspiration Solar G LLC - PV 3	9/26/17	9	23,280
Summer Wheat (FKA San Joaquin 1A - RAM 6)	10/11/18	19.24	29,998*

* Woodmere Solar Farm and Summer Wheat will have part of their output supporting the DAC interim pool.

Table 6 below summarizes the monthly sales to Solar Choice customers by customer type (residential vs. non-residential customers):

**TABLE 6
SOLAR CHOICE SALES (KWH) BY CUSTOMER TYPE – JANUARY THROUGH DECEMBER 2021**

	Jan	Feb	Mar	Apr	May	Jun	
Residential	1,973,096	1,756,617	2,242,181	2,179,095	2,206,377	3,400,096	
Non-Residential	5,624,935	7,584,606	25,024,402	37,830,132	39,602,429	48,000,382	
Total	7,598,031	9,341,223	27,266,583	40,009,227	41,808,806	51,400,478	
	Jul	Aug	Sept	Oct	Nov	Dec	Total
Residential	4,495,130	5,092,604	4,473,682	3,225,081	2,649,212	3,582,764	37,275,935
Non-Residential	46,904,622	50,910,015	47,632,785	42,428,473	38,617,486	43,117,721	433,277,988
Total	51,399,752	56,002,619	52,106,467	45,653,554	41,266,698	46,700,485	470,553,923

Presuming timely approval of Advice Letter 6451-E by the Commission, PG&E will retire a corresponding amount of Renewable Energy Certificates (RECs) in the Western Renewable

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Energy Generation Information System tracking system from both Solar Choice dedicated and borrowed pool resources to match its 2021 Solar Choice sales totals.

GTSR REVENUE AND COST REPORTING SUMMARY

GREEN TARIFF SHARED RENEWABLES BALANCING ACCOUNT

In 2021, the GTSRBA was over-collected by approximately \$21.2 million because of the supply/demand imbalance discussed above. PG&E recorded approximately \$54.2 million in revenues, net of the administration and marketing costs, as well as revenue fees and uncollectibles (RF&U), from customers served under the E-GT tariff option. The net revenues are recorded to two line items in the GTSRBA: (1) line item 5.A.1, which records the Solar Generation Charge and (2) line item 5.A.2, which records the Program Charge.¹⁰ The Program Charge includes two tariffed rate components: (1) Vintaged Power Charge Indifference Amount (VPCIA) and (2) Other Generation-related Program Charge expenses. Table 7 below summarizes the billed revenues received under the program.

TABLE 7
GTSRBA RECORDED REVENUE — JANUARY THROUGH DECEMBER 2021

Line No.	Revenues, Net of FF&U	2021 Total
1	Solar Generation Charge	\$33,877,501
2	Program Charge including VPCIA	20,327,013
3	Total	\$54,204,514

In 2021, the Solar Choice customers’ Solar Generation Charge was supported, in part, by dedicated Solar Choice resources. The associated cost of the dedicated resources in 2021 was approximately \$12.0 million. The associated Program Charge expenses, which include the VPCIA and “other” generation-related expenses, were approximately \$20.7 million. Hence, the program expenses recorded to the GTSRBA for 2021 were approximately \$32.7 million, including interest expense. Expenses for dedicated resource deliveries that exceeded the subscription levels for 2020 were transferred back to the GTSRBA in December 2021 from the Energy Resource Recovery Account (ERRA) to supplement the dedicated resources 2021 supply. Table 8 below summarizes the expenses recorded to the GTSRBA for the program’s solar generation and program charges, net of the administration and marketing costs.

¹⁰ Green Tariff Shared Renewables Balancing Accounts Preliminary Statement GR: https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_PRELIM_GR.pdf

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TABLE 8
GTSRBA RECORDED COSTS — JANUARY THROUGH DECEMBER 2021

Line No.	Expenses, Net of Admin & Marketing	2021 Total
1	Solar Generation Costs	\$12,058,879
2	Program Costs	20,694,948
3	Interest	(6,717)
4	Total	\$32,760,544

The beginning balance in the GTSRBA was \$242 thousand and the balance in the GTSRBA at the end of the year was approximately \$21.2 million over-collected. The cost of the borrowed resources needed in 2021 to balance supply with demand will be recorded to the GTSRBA in 2022 as a prior period adjustment, once the borrowed resources pool presented in Advice Letter 6451-E has been approved by the Commission.

GREEN TARIFF SHARED RENEWABLES MEMORANDUM ACCOUNT

In 2021, PG&E incurred approximately \$744 thousand in expenses to implement and manage the GTSR Program. These expenses can be broken down into five major categories: program management, information technology/billing system, energy procurement labor, contact center operations, and outreach. The recorded expenses, by category, are shown in Table 9. The expenses were recorded into a memorandum account in accordance with D.15-01-051.¹¹ PG&E implemented careful tracking of administrative and marketing costs through the use of internal order numbers in order to maintain non-participant indifference of such costs. These expenses are further described in Chapter 11 of PG&E’s Energy Resource Recovery Account Compliance Review Application, A. 22-02-015, filed on February 28, 2022.

¹¹ D.15-01-051, Conclusion of Law 58, p. 178.

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TABLE 9
GTSR MEMO ACCOUNT RECORDED COST – JANUARY THROUGH DECEMBER 2021

Line No.	Description	Amount
1	Program Management	\$241,603
2	IT/Billing System	236,501
3	Energy Procurement	107,327
4	Contact Center Operations	63,396
5	Outreach	95,256
6	Total	\$744,083

EXTERNAL ADVISORY BOARD

PURPOSE

As directed by D.15-01-051, PG&E established a GTSR External Advisory Board (EAB). The purpose of the EAB is to:

- 1) Encourage interested stakeholders to provide input and feedback to the development of the program;
- 2) Bring diverse viewpoints to key decisions and issues, with the goal of building a nationally-recognized, successful program;
- 3) Enable PG&E to solicit and receive input on specific issues, specifically regarding procurement, marketing, and program design; and
- 4) Leverage the ideas and actions of a supportive network of individuals towards the success of the program.

GTSR EXTERNAL ADVISORY BOARD MEMBERS

Members of the Advisory Board are listed below:

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Name	Role	Organization
Matthew Freedman	Consumer	The Utility Reform Network
Marc Joseph Rachael Koss	Labor	California Coalition of Utility Employees
Beth Fox Stanley Kuan	Ratepayers	CPUC – Office of Ratepayer Advocates
Ortensia Lopez	Disadvantaged/Low Income Communities	El Concilio
Dan Chwastyk	Solar	Smart Electric Power Alliance
Cathy Zhang	Communities of Color	Joint Minority Parties
Peter Miller	Environmental	Natural Resources Defense Council
Cherie Chan	Commission Staff	CPUC – Energy Division
Marc D Joseph	Law	Adams Broadwell Joseph & Cardozo
Charlie Coggeshall	Solar Advocacy	Coalition for Community Solar Access

2021 MEETINGS

EAB meetings occurred in Q2 and Q4 of 2021¹². Below is a summary of the meeting agendas.

Q2 Meeting – June 17, 2021

The agenda was as follows:

- Introductions and Check-in
- Solar Choice Metrics – Program Growth
- GTSR Regulatory Developments
 - o PG&E’s Emergency Petition for Modification
 - o Other Parties’ PFMs
- Procurement Update
- Marketing Update

¹² Quarterly EAB meetings are held biannually per Resolution E-5028 Ordering Paragraph 11 that adjusted EAB meeting cadence. Resolution E-5028 became effective September 26, 2020.

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Q4 Meeting – October 26, 2021

The agenda was as follows:

- Welcome and Safety
- Solar Choice Metrics – Program Growth
- GTSR Regulatory Developments
- Procurement Update

A. 2021 GTSR External Advisory Board Reviews of Customer Recruitment Plans

PG&E's 2021 marketing plan was shared with PG&E's Solar Choice External Advisory Board at the 2020 Q4 EAB meeting. It provided the advisory board members with a full review of PG&E's proposed marketing plan.

Any feedback received from advisory board members was taken into consideration prior to filing the Marketing Implementation Advice Letter (MIAL) for 2021. While PG&E plans to continue to provide updates on GTSR communications efforts to the EAB, no customer acquisition marketing is planned for 2022 given the CPUC's decision to pause enrollment in Solar Choice.

B. 2023 Outreach Plan

PG&E plans to file an advice letter in the fourth quarter of 2022 with the 2023 marketing plan and the associated requested budget. However, given the CPUC's decision to pause enrollment in Solar Choice, PG&E does not plan to engage in any customer acquisition in 2022 or 2023. Any marketing efforts will focus on retaining existing participants to maintain a functional program.

CCA CODE OF CONDUCT REPORT

PG&E did not conduct any marketing efforts that could be reasonably interpreted to be in violation of the CCA Code of Conduct by unfairly targeting CCA customers for enrollment into PG&E's Solar Choice Program. PG&E's efforts to market the program were not targeted to CCA customers in a CCA territory.

SUPPLIER DIVERSITY

Through its nationally-recognized Supplier Diversity Program, PG&E has worked for nearly 40 years to bring more small and diverse woman, minority, service-disabled veteran and lesbian, gay, bisexual, and transgender-owned business enterprises into its supply chain.

In 2021, PG&E spent \$4.01 billion with diverse suppliers, or 38.7 percent of the company's total procurement spend (\$10.4 billion). This spend, as well as PG&E's continual strengthening of the

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quality of its supplier diversity program initiatives and diverse supply base, reinforces PG&E's commitment to an inclusive supply chain and the economic development of the California communities it serves.

CARE ENROLLMENTS AND ENVIRONMENTAL JUSTICE PROJECTS

1,082 California Alternate Rates for Energy (CARE) customers¹³ were enrolled in Solar Choice as of March 8, 2022. Of these 1,082 customers, 53 are located in areas eligible for environmental justice projects.

Two of Solar Choice's eight dedicated resource solar projects are eligible environmental justice projects. Both projects are 1 MW in capacity. "Delano Land 1" is located in the city of McFarland in Kern County. "Manteca Land 1" is located in the city of Manteca in San Joaquin County. Other Solar Choice projects may be located in census tracts designated as eligible for the environmental justice reservation, but those projects are not designated as such either because the bidder did not elect to be considered for that category, or the project was ineligible (e.g., exceeded the 1 MW size cap).

LOW INCOME CUSTOMERS AND CUSTOMERS WHO SPEAK A LANGUAGE OTHER THAN ENGLISH AT HOME

In accordance with D.15-01-051, PG&E has executed outreach efforts leveraging appropriate targeted tactics such as Community Based Organization events to offer the Solar Choice program to low-income customers. However, as enrollment was paused in the second half of 2021 due to uncertainty regarding PG&E's Emergency PFM, no targeted customer outreach for either general market or low-income customers took place. Outreach tactics in market for the first half of 2021 reached a small number of low-income customers, including 1,082 CARE enrollments, as of March 8, 2022.

REPORTS OF REGIONAL RENEWABLE CHOICE FRAUD OR MISLEADING ADVERTISEMENTS

There were no reports of fraud or misleading advertisements for the Regional Renewable Choice program in 2021.

¹³ A "customer" is defined here by a combination of Account ID and Premise ID

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