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

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)

**2022 ANNUAL GREEN TARIFF SHARED RENEWABLES PROGRAM
REPORT OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

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Attorney for
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Dated: March 14, 2023

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**2022 ANNUAL GREEN TARIFF SHARED RENEWABLES PROGRAM
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 the 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, 2022.

Respectfully submitted,

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By: /s/ Ashley E. Merlo

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APPENDIX

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 2022 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 2016-2021 were filed by March 15 following their respective years.

The GTSR program was approved by the Commission in D.15-01-051. When able to accept new enrollments, 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.

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

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	0	156.25
EJ Reservation	45	2	0	43
City of Davis	20	0	0	20
Totals	272	52.75	0	219.25

* The capacity procured for Regional Renewable Choice has decreased from 5.31 MW to 0 MW due to contract terminations.

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

³ D.15-01-051, OP 7.

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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. 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 2022.

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	10.70	11.30	22.00
2019 Enrolled MW	6.50	25.30	31.80
2020 Enrolled MW	7.70	26.40	34.10
2021 Enrolled MW	15.00	174.20	189.20
2022 Enrolled MW	14.10	178.90	193.00

TABLE 3
ALTERNATE SOLAR CHOICE CAPACITY METHODOLOGY RESULTS (MW)

Category	March 2022	June 2022	Sept 2022	Dec 2022
Residential Customers	14.8	13.1	11.8	10.6
Non-Residential Customers	174.6	160.8	158.4	156.0
Total	189.4	173.9	170.2	166.5

There was no customer enrollment in the Regional Renewable Choice program in 2022 because there are no active Regional Renewable Choice projects in PG&E's GTSR program.

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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) which sought modification of D.15-01-051, 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 increase in Solar Choice customer enrollments.⁴

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 Program⁵. PG&E filed AL 6451-E on December 30, 2021, requesting approval of a borrowed pool of resources, which was approved on June 29, 2022.⁶ 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.

PG&E anticipated the possibility that solicitations would not result in 176.15 MW of signed contracts for new dedicated resources by December 31, 2022, as required by OP 3 in D.21-12-036. Accordingly, on October 11, 2022, PG&E filed a Rule 16.6 Request for Extension of Time to Comply with the requirements in OP 3 of D.21-12-036. PG&E asked for an extension to December 31, 2023, to have contracts signed, which the CPUC approved on December 30, 2022.

GENERATION FROM SOLAR CHOICE DEDICATED AND BORROWED POOL RESOURCES

During 2022, Solar Choice customers' usage was supported both by its dedicated solar resource pool as well as interim resources in accordance with D.21-12-036. Table 4 presents the GTSR Program dedicated solar resources that were online and providing energy to Solar Choice customers throughout 2022. Table 5 lists the approved borrowed pool of interim resources that PG&E is using to supplement dedicated resource generation, as detailed in Advice Letter 6451-E.

⁴ 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.

⁵ D.21-12-036 is available online at the following URL: [433096271.PDF \(ca.gov\)](https://www.cpuc.ca.gov/infocenter/infocenter.do?infocenter=433096271.PDF)

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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
BORROWED GTSR POOL:

Project Name	Actual Contract Operating Date	Capacity (MW)
Shafter Solar – RAM 3	6/3/15	13.15
Bakersfield 111	7/8/15	1.4
Fresno Cogeneration - Fresno Solar South	10/20/15	1.5
Fresno Cogeneration - Fresno Solar West	10/20/15	1.5
Columbia Solar Energy - RAM 2	10/21/15	19
Greenlight - Sirius Solar Project	10/22/15	0.999
Morelos del Sol - RAM 3	12/2/15	15
Woodmere Solar Farm - RAM 4	12/23/15	15
Greenlight - Peacock Solar Project	2/3/16	0.999
Greenlight - Castor Solar Project	4/7/16	1.5
CED Corcoran Solar 3, LLC - PV 3	12/1/16	20
CED Oro Loma Solar Project A - RAM 5	1/26/17	10
Avenal Solar Project A - RAM 5	1/26/17	7.9
CED Oro Loma Solar Project B - RAM 5	1/26/17	10
Avenal Solar Project B - RAM 5	1/26/17	7.9
Westside Solar, LLC - PV 3	3/13/17	20
Aspiration Solar G LLC - PV 3	9/26/17	9
Summer Wheat (FKA San Joaquin 1A - RAM 6)	10/11/18	19.24

** Part of Woodmere Solar Farm and Summer Wheat generation also supports the DAC interim pool.*

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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 2022

	Jan	Feb	Mar	Apr	May	Jun		
Residential	3,045,471	2,718,280	2,925,683	2,341,283	2,252,394	2,781,714		
Non-Residential	34,001,835	31,114,342	35,633,767	32,807,866	32,024,298	34,718,548		
Total	37,047,306	33,832,622	38,559,450	35,149,149	34,276,692	37,500,262		
	Jul	Aug	Sept	Oct	Nov	Dec	Total	
Residential	2,997,652	3,587,601	3,201,028	2,187,166	1,910,338	2,220,502	32,169,112	
Non-Residential	35,942,426	39,352,899	38,431,592	35,105,880	27,593,282	31,584,922	408,311,657	
Total	38,940,078	42,940,500	41,632,620	37,293,046	29,503,620	33,805,424	440,480,769	

PG&E will retire a corresponding amount of Renewable Energy Certificates (RECs) in the Western Renewable Energy Generation Information System tracking system from both Solar Choice dedicated and borrowed pool resources to match its 2022 Solar Choice sales totals.

GTSR REVENUE AND COST REPORTING SUMMARY

GREEN TARIFF SHARED RENEWABLES BALANCING ACCOUNT

In 2022, the GTSR balancing account (GTSRBA) was over-collected by approximately \$21.2 million because of the supply/demand imbalance discussed above. PG&E recorded approximately \$59.1 million in revenues, net of the administration and marketing costs, and net of revenue fees and uncollectibles (RF&U), from customers served under the E-GT tariff option. The net revenues are recorded to two lines 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.⁷ 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.

⁷ Green Tariff Shared Renewables Balancing Account Preliminary Statement GR:
https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_PRELIM_GR.pdf

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TABLE 7
GTSRBA RECORDED REVENUE — JANUARY THROUGH DECEMBER 2022

Line No.	Revenues, Net of FF&U	2022 Total
1	Solar Generation Charge	\$28,124,733
2	Program Charge including VPCIA	31,009,428
3	Total	\$59,134,161

In 2022, the Solar Choice customers' Solar Generation Charge was supported, in part, by dedicated Solar Choice resources. The associated cost of the dedicated resources in 2022 was approximately \$8.5 million and the associated cost of interim pool resources for 2022 was \$25.4 million. Additionally, PG&E recorded interim pool resources for 2021 of \$23.3 million. The associated Program Charge expenses, which include the VPCIA and "other" generation-related expenses, were approximately \$31.0 million. Hence, the program expenses recorded to the GTSRBA for 2022 were approximately \$87.7 million, including interest. 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.

TABLE 8
GTSRBA RECORDED COSTS — JANUARY THROUGH DECEMBER 2022*

Line No.	Expenses, Net of Admin & Marketing	2022 Total
1	Solar Generation Costs – Dedicated Resources	\$8,539,235
2	Solar Generation Costs – 2022 Interim Pool	25,380,379
3	Solar Generation Costs – 2021 Interim Pool*	23,253,629
4	Program Costs	30,989,253
5	Interest	(504,796)
6	Total	\$87,657,700

* Table includes Solar Generation Interim Pool Costs for 2021

The beginning balance in the GTSRBA was \$21.215 million over-collected and the balance in the GTSRBA at the end of the year was approximately \$7.308 million under-collected. The cost of the borrowed solar generation resources needed in 2021 and 2022 to balance supply with demand was recorded to the GTSRBA during the December accounting close, as shown on lines 2 and 3 in Table 8.

GREEN TARIFF SHARED RENEWABLES MEMORANDUM ACCOUNT

In 2022, PG&E incurred \$313,708 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,

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and outreach. The recorded expenses, by category, are shown in Table 9. The expenses were recorded into a memorandum account in accordance with D.15-01-051.⁸ 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 (ERRA) Compliance Review Application, A. 23-02-018, filed on February 28, 2023.⁹

TABLE 9
GTSR MEMO ACCOUNT RECORDED COST – JANUARY THROUGH DECEMBER 2022

Line No.	Description	Amount
1	Program Management	\$186,117
2	IT/Billing System	16,620
3	Energy Procurement	105,066
4	Contact Center Operations	TBD ¹⁰
5	Outreach	5,905
6	Total	\$313,708

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

⁸ D.15-01-051, Conclusion of Law 58, p. 178.

⁹ The methodology used to identify Solar Choice (GT) calls received in PG&E's contact centers was discovered to be inaccurate. Accordingly, PG&E is creating a new methodology to accurately identify Solar Choice calls using a speech analytics tool and plans to submit supplemental testimony with updated contact center operations costs in the ERRA proceeding on April 28, 2023.

¹⁰ Contact Center Operations costs will be detailed in PG&E's supplemental testimony that will be submitted on April 28, 2023 in its ERRA Compliance Review proceeding (A.23-02-018). See n. 11.

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- 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:

Name	Role	Organization
Matthew Freedman	Consumer	The Utility Reform Network
Marc Joseph Rachael Koss	Labor	California Coalition of Utility Employees
Shelly Lyser Sophie Babka	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
Derek Chernow	Solar Advocacy	Coalition for Community Solar Access

2022 MEETINGS

EAB meetings occurred in Q2 and Q4 of 2022¹¹. Below is a summary of the meeting agendas.

¹¹ 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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Q2 Meeting – June 28, 2022

The agenda was as follows:

1. Welcome & Safety
2. Solar Choice Metrics
3. GTSR Regulatory Developments
4. Procurement Update
5. Marketing Update

Q4 Meeting – December 7, 2022

The agenda was as follows:

1. Welcome & Safety
2. Solar Choice Metrics
3. GTSR Regulatory and Policy Developments
 1. CPUC GAP Proceeding
4. Procurement Update
5. Marketing Update

A. GTSR External Advisory Board Reviews of Customer Recruitment Plans

In previous years PG&E's marketing plan for the subsequent year was shared with PG&E's Solar Choice External Advisory Board at one of the EAB meetings. The advisory board members had an opportunity to review PG&E's proposed marketing plan and provide feedback, which PG&E then took into consideration prior to filing the Marketing Implementation Advice Letter (MIAL) for the following year.

PG&E plans to do no acquisition marketing in 2023 because the Solar Choice program is unable to enroll new customers. Accordingly, no marketing plans were shared with the EAB in 2022.

B. 2023 Outreach Plan

PG&E plans to file an advice letter in the fourth quarter of 2023 with the 2024 marketing plan and the associated requested budget. However, given the CPUC's decision to suspend enrollment in Solar Choice PG&E does not plan to engage in any customer acquisition in 2023 or 2024. 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

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PG&E's Solar Choice Program. No efforts to market the program were targeted at CCA customers in a CCA territory by PG&E.

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 2022, PG&E spent \$4.79 billion with diverse suppliers, or 39.3 percent of the company's total procurement spend (\$12.1 billion). This spend, as well as PG&E's continual strengthening of the 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

764 California Alternate Rates for Energy (CARE) customers¹² were enrolled in Solar Choice as of February 10, 2023. Of these 764 customers, 59 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 in the past executed outreach efforts, such as leveraging 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 and subsequently suspended by the CPUC in its

¹² A "customer" is defined here by a combination of Account ID and Premise ID

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resolution of PG&E's PFM, no targeted customer outreach for either general market or low-income customers took place in 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 2022.

CONCLUSION

As directed by D.15-01-051, PG&E provides the CPUC and interested parties with this Annual Report of the GTSR Program for the period of January 1 to December 31, 2022.