

**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
A.14-01-007
(Consolidated)

**ANNUAL GTSR PROGRAM PROGRESS REPORT OF SAN DIEGO GAS &
ELECTRIC COMPANY (U 902 E) FOR ACTIVITIES OCCURRING IN 2022**

E. Gregory Barnes

Attorney for:

SAN DIEGO GAS & ELECTRIC COMPANY

8330 Century Park Court, CP32D

San Diego, CA 92123

Telephone: (858) 654-1583

Facsimile: (619) 699-5027

Email: gbarnes@sdge.com

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ELECTRIC COMPANY (U 902 E) FOR ACTIVITIES OCCURRING IN 2022**

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 2022 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:

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.

- Enrollment reporting, including “available capacity” data at the most detailed level feasible, updated monthly, with the precision of the information increasing over time;
- 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 2022.

I. 2022 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 EcoShare solicitation in October 2022 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 12/31/22 (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 2022 subscribed generation capacity for the GT and ECR components by month.

As of the beginning of 2022, commercial customers had subscribed to 0.716 MW of GT Program capacity and residential customers had subscribed to 1.879 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. Beginning in

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.

March 2021, rates began increasing rapidly due to the expansion of Community Choice Aggregation in SDG&E’s service territory. This resulted in a substantial number of participating customers opting out of the program. This trend continued in 2022 to the point that the GT was no longer sustainable. Due to the increasing rates and limited availability of attracting bundled customers to the program, SDG&E filed to suspend GTSR in the Green Access Programs (“GAP”) Application.⁷ The Commission granted the request for suspension but only for the GT Program (EcoChoice). Pursuant to SDG&E AL 4074-E,⁸ SDG&E unenrolled all remaining customers in the GT component of GTSR and is awaiting a final decision in the GAP Application.

Table 2. 2022 GTSR Customer Enrollment Summary (all values in MW)

Month	GT Subscribed Capacity	ECR Subscribed Capacity
January	2.595	0
February	1.916	0
March	1.801	0
April	1.676	0
May	0.874	0
June	0.738	0
July	0.712	0
August	0.703	0
September	0.703	0
October	0.632	0
November	0.00	0
December	0.00	0

⁷ A. 22-05-022.

⁸ Accepted November 21, 2022, effective September 9, 2022.

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 Interim Pool,⁹ the sum of customer purchased renewable energy is converted into an equivalent amount of renewable generation (*i.e.*, Subscribed Capacity).¹⁰

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 2022. SDG&E held a GTSR EcoShare solicitation in October 2022 focused on adding ECR capacity but did not receive any bids. As noted above, SDG&E filed AL 4074-E on September 9, 2022 to suspend and unenroll customers participating in the GT program for the reasons stated in the advice letter.

II. GENERATION TRANSFERRED BETWEEN RPS AND GTSR

Due to lower customer enrollment in 2022 as described above, all customer consumption in the GTSR program was served with GTSR-dedicated resources, and the GT Interim Pool generation was not needed in 2022. Customers enrolled in the GT component of SDG&E's

⁹ SDG&E's Interim Pool includes RPS qualifying solar facilities with existing power purchase agreements that meet the requirements specified in the Decision.

¹⁰ Advice Letter 2853-E, (approved March 2, 2016 and effective March 5, 2016) specifies the facilities currently included in SDG&E's Interim Pool.

GTSR Program purchased zero megawatt-hours (“MWh”) of renewable generation from the GT Interim Pool in 2022. Costs associated with this generation totaled \$0 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”).

III. REVENUE AND COSTS

In 2022, SDG&E incurred \$84,218 in non-commodity expenses related to program management and for marketing, education, and outreach. Table 3 summarizes non-commodity expenses by category; revenues are summarized in Table 4.

Table 3. 2022 GTSR Expenditure Summary (non-commodity)¹¹

Memorandum Account	SDG&E Internal Order	Description	2022 Expenditures	Program to date Expenditures
GTSR Administrative Costs Memorandum Account (“GTSRACMA”)	7078688	GT Information Technology	\$0	\$1,253,376
	7078689	ECR Information Technology	\$0	\$553,764
	7078690	GT Program Management	\$65,918	\$695,907
	7078691	ECR Program Management	\$4,261	\$283,570
GT Marketing, Education, & Outreach Memorandum Account (“GTME&OMA”)	7078692	GT Marketing and Outreach	\$14,039	\$538,394
ECR Marketing, Education, & Outreach Memorandum Account (“ECRME&OMA”)	7078693	ECR Marketing and Outreach	\$0	\$2,828
Total			\$84,218	\$3,327,839

¹¹ In 2022, interest was booked to the GTSR Program memorandum accounts as follows:

GTSRACMA	GTME&OMA	ECRME&OMA	GTSRBA
\$26,088	\$2,358	\$51	\$50,029

Table 4. 2022 GTSR Revenue Summary (non-commodity)

Memorandum Account	2022 Revenue	Cumulative Total Revenue
GTSRACMA	\$78,109	\$1,378,357
GTME&OMA	\$89,547	\$693,945
ECRME&OMA	\$0	\$0
Total	\$167,656	\$2,072,302

Commodity-related revenues and expenses for the GT and ECR components are recorded in the Green Tariff Shared Renewables Balancing Account (“GTSRBA”). Table 5 summarizes the GT subaccount by activity for 2022.

Table 5. 2022 GTSRBA Summary

Account	2022 Revenue	2022 Expenses	2022 Over Collection
GT Subaccount	\$903,497	(\$37,494)	\$940,991
ECR Subaccount	\$0	\$0	\$0
Total	\$903,497	(\$37,494)	\$940,991

IV. SUMMARY OF ADVISORY GROUP ACTIVITIES

The Decision requires a summary of advisory group activities or consultation with community-based organizations, if any.¹² As noted above, SDG&E filed AL 4074-E to suspend and unenroll customers participating in the GT program. Accordingly, SDG&E has no Advisory Group activity to report for the 2022 calendar year.

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

¹² Decision at 141.

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. Outreach channels utilized include events, presentations, and messaging through online and social media channels.
- 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 2022 marketing and outreach activities were consistent with the CCA Code of Conduct, D.15-01-051, and Resolution E-4734.

VI. SUPPLIER DIVERSITY

In 2022, 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 2022, 362 CARE customers enrolled in the GT portion of SDG&E’s GTSR program. These customer service points have been cross referenced with the 25% most impacted communities identified using the California Environmental Protection Agency’s CalEnviroScreen 4.0. Out of those 362 CARE customers, 97 are located in areas that are also eligible for an EJ project, as defined in the Decision.¹³

VIII. REPORTS OF FRAUD OR MISLEADING ADVERTISEMENT

SDG&E has neither received any reports of fraud or misleading advertising concerning the GTSR Program during 2022, 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 2022, as also mentioned above in Section VIII, 362 customers enrolled in the GT component were identified as CARE, indicating they are low-income. SDG&E also records

¹³ Decision at 51-52.

whether residential customers signing up for rates speak a language other than English at home. Through 2022, SDG&E's residential GT customers were found to fall into the following categories: 96.1% English speaking, 2.9% Spanish speaking, 0.9% Vietnamese speaking and 0.1% unknown. As stated, the ECR component had no enrollment through 2022, 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 2022 and will continue to experience going forward. In response to these challenges, SDG&E received approval to suspend the GT Program and filed AL 4074-E unenrolling all customers in the program.

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

Respectfully submitted,

SAN DIEGO GAS & ELECTRIC COMPANY

By: /s/ Dana Golan

Dana Golan

Vice President – Customer Operations

SAN DIEGO GAS & ELECTRIC COMPANY

8330 Century Park Court, CP22C

San Diego, CA 92123

Telephone: (858) 654-1669

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