

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 28, 2021

File Nos.: R.14-07-002 et al.

Sidney Bob Dietz II
Director, Regulatory Relations
Pacific Gas and Electric Company
P.O. Box 770000
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Sidney.Dietz@pge.com

RE: Joint IOUs' Request for an Extension of Time to File an Application for Review of the Disadvantaged Communities Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT) Programs and Additionally to Suspend Solicitations for New DAC-GT and CSGT Projects by Southern California Edison and San Diego Gas & Electric

Dear Sidney Bob Dietz:

I am in receipt of your letter dated October 11, 2021. Pursuant to Rule 16.6 of the California Public Utilities Commission's Rules of Practice and Procedure, your letter requests a six-month extension of time until July 1, 2022, for Pacific Gas and Electric Company (PG&E), with Southern California Edison Company (SCE) and San Diego Gas & Electric Company (SDG&E), (collectively, the Joint investor-owned utilities (IOUs)), to file applications to review their respective DAC-GT and CSGT programs (Applications). Additionally, SCE and SDG&E request to suspend solicitations for their DAC-GT and CSGT projects until after the Commission rules on their Applications and potential program adjustments are implemented, which could improve the success rate of future solicitations.

On October 13, 2021, the Coalition for Community Solar Access (CCSA) responded to your letter stating that a six-month extension is unjustifiably long; CCSA recommends a shorter extension, until April 1, 2022. Additionally, CCSA states that SCE's and SDG&E's request to suspend procurement is unreasonable given the forthcoming program review proceedings, which may result in modifications to the procurement process, and should be denied in full.

On October 14, 2021, the Joint IOUs replied to CCSA's response clarifying that they anticipate that the final report will be made available in February 2022 and suggesting that the Applications deadline be extended by a potentially shorter period of time, to the 60th day following issuance and service of the independent evaluator's report. Additionally, SCE and SDG&E clarify that they are not requesting to suspend DAC-GT and CSGT procurement indefinitely, but rather only until the Applications process is completed and any modifications are addressed.

Ordering Paragraph 16 of Decision (D.)18-06-027, issued June 22, 2018, requires that the IOUs each file an application for review of the DAC-GT and CSGT programs no later than January 1, 2021 and that the resulting proceeding would include a review of both the programs' costs and

benefits, and may result in revisions to the tariff, if appropriate. In December 2020, I approved a one-year extension request, until January 1, 2022, to allow for sufficient time for DAC-GT and CSGT projects to come online and for the IOUs to evaluate program costs and benefits. The Joint IOUs' letter requests a further extension of time to allow the IOUs sufficient time to include and respond to the analysis and recommendations of the ongoing statewide independent evaluation (IE) of the DAC-GT and CSGT programs in their Applications.

Relevant to the Joint IOUs' request, Energy Division provided stakeholders and the IOUs with an Application for Review Guidance template and held a public webinar on the topic in September 2021. The template proposes that the IOUs provide additional information beyond what is directed in Decision 18-06-027 or in Resolution E-4999. Specifically, the IOUs were encouraged to report on the status and future goals of their "green access programs" or rooftop solar alternatives including the DAC-GT, CSGT and Green Tariff Shared Renewables programs.

Your letter states that since the December 2020 extension approval, the first tri-annual DAC-GT and CSGT program evaluation was initiated in April 2021. In addition, you note that Energy Division has requested that the Joint IOUs' Applications incorporate findings gleaned from the analysis conducted by the programs' evaluation. That final evaluation report is not scheduled to be published until February 2022 (one month after the current deadline to file the Applications), and you indicate that the IOUs would not have enough time to incorporate and respond to the report's findings.

Ordering Paragraph 8 of Resolution E-4999, issued June 3, 2019, directs the IOUs to solicit two Requests for Offers (RFOs)¹ per year. Your letter states that while SCE and SDG&E have sought ways to increase bidder participation, both utilities have had a low response rate to their RFOs, noting that SCE has completed three biannual RFOs yielding only one successful CSGT offer, and SDG&E has held four biannual RFOs with no successful bids. In order to limit unnecessary program spending while ensuring efficient use of greenhouse gas auction proceeds and Public Purpose Program funding, SCE and SDG&E request to suspend all future solicitations for new DAC-GT and CSGT projects until after the Commission rules on the IOUs' Applications.

The Joint IOUs' request for an extension to file their Applications until the 60th day following issuance and service of the 2021 DAC-GT and CSGT IE Final Report is reasonable and hereby granted. As the Final Report is anticipated by the end of February 2022, a four-month extension will allow sufficient time for the Joint IOUs to fully incorporate and respond to the 2021 DAC-GT and CSGT IE Final Report using Energy Division's recommended Applications for Review Guidance template. Additionally, SCE's and SDG&E's request to suspend future solicitations for new DAC-GT and CSGT projects, until after the Commission rules on the forthcoming Applications, is granted. To date, there have been no successful offers for two successive SCE RFOs and no successful bids for at least three successive SDG&E RFOs. It is prudent to limit unnecessary program spending until procurement challenges and program design limitations

¹ A Request for Offers (RFO) is an open and competitive solicitation method used to obtain products or services from potential providers and outlines the requirements, contract terms, and bidding process.

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can be clearly identified in the Final Report and addressed in the forthcoming proceeding process next year.

Pursuant to Rule 16.6, PG&E must on behalf of the Joint IOUs promptly inform all parties to Rulemaking 14-07-002 et al. of the relief granted in this letter.

Sincerely,

A handwritten signature in black ink that reads "Rachel Peterson". The signature is written in a cursive, flowing style.

Rachel Peterson
Executive Director

cc: Edward Randolph, Deputy Executive Director for Energy and Climate Policy
Charlie Coggeshall, Western Regional Director, Coalition for Community Solar Access