

July 2, 2024

ADVICE 7196-E-B

(Pacific Gas and Electric Company ID U 39-E)

ADVICE 5241-E-B

(Southern California Edison Company ID U 338-E)

ADVICE 4392-E-B

(San Diego Gas & Electric Company ID U 902-E)

ADVICE 234-E-B

(Liberty Utilities (CalPeco Electric) LLC Company ID U 933-E)

ADVICE 732-E-B

(PacifiCorp Company ID U 901 E)

Public Utilities Commission of the State of California

Subject: Second Supplemental Joint Investor-Owned Utility Notice of Solar on Multifamily Affordable Housing Program Funding True-Up for 2023 Recorded Greenhouse Gas Allowance Revenues Pursuant to Decision 22-09-009

Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), Liberty Utilities (CalPeco Electric) LLC (Liberty), and PacifiCorp Company (PacifiCorp) (collectively, the "Joint IOUs") submit this Supplemental Tier 1 advice letter in accordance with Ordering Paragraph (OP) 4 of Decision (D.) 22-09-009.

Purpose

This Supplemental advice letter, consistent with Pursuant to OP 4 of D. 22-09-009, establishes the final proportionate share of the \$100 million cap in annual SOMAH funding and the final 2023 true-up to be incorporated into the Joint IOUs' respective Energy Resource Recovery Account (ERRA) or Energy Cost Adjustment Clause (ECAC) forecast proceedings that are filed in 2024 for the 2025 forecast year. This supplemental advice letter is submitted to clarify the true-up calculation as the difference between the previously approved set aside in the 2023 ERRA or ECAC filings less the IOUs' share of the \$100 million cap.

Background

Pursuant to Assembly Bill (AB) 693 (Stats. 2015, Ch. 582), D.17-12-022 established the SOMAH program to provide financial incentives for installation of solar energy systems on multifamily affordable housing properties, as specified in the statute. Public Utilities Code Section 2870(c) provides:

The Commission shall annually authorize the allocation of one hundred million dollars (\$100,000,000) or ten percent of available funds, whichever is less, from the revenues described in subdivision (c) of Section 748.5 for the Multifamily Affordable Housing Solar Roofs Program, beginning with the fiscal year June 30, 2020. The commission shall continue authorizing the allocation of these funds through June 30, 2026, if the commission determines that revenues are available after 2020 and that there is adequate interest and participation in the program.

The statute provides for a maximum annual budget of \$100 million, and also creates a structure wherein each IOU's annual contribution amount is based on the total allocated allowance auction proceeds of all the other IOUs. Funding for the SOMAH program is set aside annually by the IOUs' ERRA forecast application and ECAC applications. Pursuant to D.17-12-022, the Commission in D.20-04-012 continued authorizing the allocation of SOMAH funds through June 30, 2026.

On May 13, 2022, SCE filed a Petition for Modification (PFM) of D.17-12-022 and D.20-04-012, requesting to modify the process by which the IOUs initially set aside SOMAH funds, asserting that the IOUs were likely setting aside SOMAH funding in excess of \$100 million (prior to their annual true-up). The PFM proposed to clarify that the IOUs may submit a SOMAH funding set-aside in their respective ERRA Forecast and ECAC proceedings by applying the \$100 million cap on a forecast basis. Of particular relevance to this advice letter, SCE also requested that the IOUs coordinate to submit a joint true-up advice letter, rather than each IOU submitting its own advice letter as directed by D.20-04-012.

On September 25, 2022, the Commission adopted D.22-09-009, which modified D.17-12-022 and D.20-04-012 to simplify the process for forecasting and setting aside funding for the SOMAH program, including approving the request for a Joint IOU advice letter true-up.

While D.22-09-009 does not alter the existing true-up advice letter process, pursuant to OP 4, through modification of language on page 11 of D.20-04-022, the Joint IOUs may jointly submit a Tier 1 advice letter showing each IOU's prior year recorded greenhouse gas (GHG) allowance revenue and, if the \$100 million cap is reached, a calculation of each IOU's proportionate share of \$100 million.

D.22-09-009 modified the language on page 11 of D.20-04-012 as follows (additions underlined):

The true-up for the final three months of each year shall occur via a joint (i.e., jointly submitted by all five electric IOUs) Tier 1 advice letter, and submitted by one of the three large electric IOUs (PG&E, SCE, or SDG&E) on behalf of all five electric IOUs, as soon as this information becomes available, and no later than March 1 of the following year.

DISCUSSION

Consistent with the requirements of D.20-04-012 as modified by D.22-09-009, Table 1 below reflects a final accounting of each IOU's total GHG allowance revenues for 2023 as tracked in the IOUs' respective GHG revenue balancing account. The true-up or credit amount for 2023 is the difference between the previously approved set aside in the 2023 ERRA or ECAC filings less the IOUs' share of the \$100 million cap. These 2023 true-up or credit amounts will be incorporated into each of the IOU's 2025 ERRA and ECAC forecast proceedings.

TABLE 1 - All IOU's: 2023 Recorded GHG Allowance Revenue and Allocation of SOMAH Funding

IOU	2023 Recorded GHG Proceeds	Percent Allocations of Total GHG Proceeds	Share of \$100M	Previously Approved Set Aside in 2023 ERRA or ECAC	True-up/Difference (Previously Approved Set Aside Less Share of \$100M)
SCE	\$789,701,028	50.208714%	\$50,208,714	\$46,527,856	(\$3,680,858)
PG&E	\$544,616,174	34.626367%	\$34,626,367	\$39,757,379	\$5,131,012
SDG&E	\$214,387,613	13.630635%	\$13,630,635	\$12,015,972	(\$1,614,663)
Liberty	\$6,282,980	0.399468%	\$399,468	\$332,411	(\$67,057)
PacifiCorp	\$17,848,799	1.134816%	\$1,134,816	\$1,784,880	\$650,064
Total	\$1,572,836,594	100.00%	\$100,000,000	\$100,418,498	\$418,498

Table 2 – SCE

SOMAH Funding Prior Years True Up	Recorded GHG Allowance Revenues	Set-Aside Based On 10% Of Recorded GHG Allowance Revenue (\$100M limit)	Previously Approved Actual Set-Aside*	Annual Difference
2016	\$188,087,539	\$18,808,754	\$0	(\$18,808,754)
2017	\$384,894,152	\$38,489,415	\$8,077,000	(\$30,412,415)
2018	\$389,316,108	\$38,931,611	\$39,125,783	\$194,173
2019	\$421,170,202	\$42,117,020	\$40,853,635	(\$1,263,386)
2020	\$420,965,362	\$42,096,536	\$73,281,647	\$31,185,111
2021	\$551,751,564	\$49,498,366	\$63,966,285	\$14,467,919
2022	\$700,179,282	\$50,134,994	\$73,364,564	\$23,229,570
2023	\$789,701,028	\$50,208,714	\$46,527,856	(\$3,680,858)
Total	\$3,846,065,235	\$330,285,411	\$345,196,770	\$14,911,360

Table 3 – PG&E

SOMAH Funding Prior Years True-Up	Recorded GHG Allowance Revenues	Set-Aside Based on 10% of Recorded GHG Revenue (\$100M limit)	Previously Approved Actual Set-Aside (a)	Annual Difference
2016 (b)	\$301,670,155	\$15,083,508	\$15,083,508	\$0
2017	\$345,513,934	\$34,551,393	\$34,551,393	\$0
2018	\$348,098,763	\$34,809,876	\$34,809,876	\$0
2019	\$389,040,958	\$38,904,096	\$38,904,096	\$0
2020	\$385,893,957	\$38,589,396	\$38,589,396	\$0
2021	\$384,773,215	\$34,518,517	\$34,518,517	\$0
2022	\$486,243,930	\$34,816,563	\$34,816,563	\$0
2023 (c)	\$544,616,174	\$34,626,367	\$39,757,379	\$5,131,012
Total	\$3,185,851,086	\$265,899,716	\$271,030,728	\$5,131,012

Notes for Table 3: (on following page)

(a) Years 2016-2018 include true-ups for previous under-collections, which were collected in 2020 (\$29.52 million) per D.20-02-047 and 2021 (\$4.45 million) per D.20-12-038. Year 2019 includes the true-up (\$1.17 million), which was collected in 2019. Year 2020 includes the netting of the over-collection from the 2022 set aside request (\$187 thousand), which was performed in 2022 per D.22-02-002. Year 2021 includes the true-up (\$2.91 million), which was collected in 2023 per D.22-12-044. Year 2022 includes the 2022 true-up (\$11.59 million) which was collected in 2024 per D.23-12-022). 2023 is the only year with a pending true-up (credit) collection.

(b) AB 693 implemented SOMAH mid-way through 2016; therefore, GHG Revenues and set aside amount are prorated 50 percent and totals reflect the prorated amounts.

(c) Based on 2023 recorded GHG allowance revenues and the IOU \$100 million cap, PG&E over-forecasted the 2023 set aside by \$5.13 million. In the 2025 ERRR Forecast Filing, PG&E plans to propose enacting the true-up by netting the 2023 reserve of \$5.13 million from the 2025 SOMAH set aside request.

Table 4 - SDG&E

SOMAH Funding Prior Years True-Up	Recorded GHG Allowance Revenues	Set-Aside Based on 10% of Recorded GHG Revenue (\$100M limit)	Previously Approved Actual Set-Aside	Annual Difference
2016 ¹	\$40,779,160	\$4,077,916	\$4,077,916	\$0
2017 ²	\$92,539,677	\$9,253,968	\$9,253,968	\$0
2018 ³	\$93,727,555	\$9,372,756	\$9,372,756	\$0
2019 ⁴	\$104,156,909	\$10,415,691	\$10,415,691	\$0
2020 ⁵	\$104,691,923	\$10,469,192	\$10,469,192	\$0
2021 ⁶	\$161,825,842	\$14,517,611	\$14,517,611	\$0
2022 ⁷	\$189,236,214	\$13,549,896	\$19,440,352	\$5,890,456
2023 ⁸	\$214,387,613	\$13,630,635	\$12,015,972	(\$1,614,663)
Total	\$1,001,344,89	\$85,287,665	\$89,563,458	\$4,275,793

Notes for Table 4:

¹ \$4,077,916 set-aside for 2016 ERRR approved in D.20-01-005.

² \$9,253,968 set-aside for 2017 ERRR approved in D.20-01-005.

³ \$10,300,000 set-aside for 2018 ERRR approved in D.17-12-014; -\$927,245 true-up for 2018 approved in D.20-01-005.

⁴ \$10,115,640 set-aside for 2019 ERRR approved in D.18-12-016; \$199,565 true-up for 2019 approved in D.20-01-005; \$100,486 true-up for 2019 approved in D.21-01-017.

⁵ \$5,618,639 set-aside for 2020 approved in D.20-01-005; \$5,820,202 true-up for Jul-Dec 2020 approved in D.21-01-017; -\$760,623 true-up for Jan-Jun 2020 approved in D.21-01-017; -\$209,026 true-up for Oct-Dec 2020 approved in D.21-12-040.

⁶ \$11,583,644 set-aside for 2021 approved in D.21-01-017; \$2,933,967 true-up for 2021 approved in D.22-12-042.

⁷ \$19,440,352 set-aside for 2022 approved in D.21-12-040.

⁸ \$12,015,972 set-aside for 2023 approved in D.22-12-042.

Table 5 – Liberty

SOMAH Funding Prior Years True-Up	Recorded GHG Allowance Revenues	Set-Aside Based on 10% of Recorded GHG Revenue (\$100M limit) **	Previously Approved Actual Set-Aside	Annual Difference *
2016	\$0	\$0	\$0	\$0
2017	\$3,048,375	\$304,838	\$287,032	(\$17,806)
2018	\$3,658,091	\$365,809	\$349,673	(\$16,136)
2019	\$4,250,819	\$425,082	\$466,130	\$41,048
2020	\$3,794,503	\$379,450	\$362,585	(\$16,865)
2021	\$4,220,989	\$378,671	\$333,475	(\$45,196)
2022	\$5,365,389	\$384,178	\$446,231	\$62,053
2023	\$6,282,980	\$399,468	\$332,411	(\$67,057)
Total	\$30,621,146	\$2,637,496	\$2,577,537	(\$59,959)

Notes for Table 5:

* Liberty has reversed the signs for the difference, to align with the SOMAH Decision reporting methodology.

** Liberty's set-aside for 2023 was based on the 10% of recorded GHG revenue, \$523,613 in the ECAC filing. The difference between the previously approved actual set aside and Liberty's portion of the \$100 million limit is to be requested in Liberty's 2025 ECAC application.

Table 6 - PacifiCorp

SOMAH Funding Prior Years True-Up	Recorded GHG Allowance Revenues	Set-Aside Based on 10% of Recorded GHG Revenue (\$100M limit)	Previously Approved 'Actual' Set-Aside	Annual Difference
2016	\$9,387,611	\$469,380	\$469,380	\$0
2017	\$10,681,011	\$1,068,101	\$1,068,101	\$0
2018	\$11,216,803	\$1,121,680	\$1,121,680	\$0
2019	\$12,783,641	\$1,278,364	\$1,278,364	\$0
2020	\$13,082,153	\$1,308,215	\$1,308,215	\$0
2021	\$12,114,799	\$1,086,835	\$1,211,479	\$124,644
2022	\$15,563,147	\$1,556,315	\$1,066,147	(\$490,168)
2023	\$17,848,799	1,134,816	\$1,784,880	\$650,064
Total	\$102,677,964	\$9,023,706	\$9,308,246	\$284,540

Protests

PG&E requests that the Commission, pursuant to GO 96-B, General Rule 7.5.1, maintain the original protest and comment period designated in advice letter 7196-E.

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.1, and OP 4 of D. 22-09-009, this advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice letter submittal become effective concurrent with original advice letter 7196-E, which is **March 1, 2024**.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the parties on the service list for R.14-07-002. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Sidney Bob Dietz II
Director, Regulatory Relations
CPUC Communications

cc: Service List: R.14-07-002



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (U 39 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Michael Finnerty
 Phone #: (279) 789-6216
 E-mail: PGETariffs@pge.com
 E-mail Disposition Notice to: michael.finnerty@pge.com

EXPLANATION OF UTILITY TYPE
 ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 7196-E-B

Tier Designation: 1

Subject of AL: Second Supplemental Joint Investor-Owned Utility Notice of Solar on Multifamily Affordable Housing Program Funding True-Up for 2023 Recorded Greenhouse Gas Allowance Revenues Pursuant to Decision 22-09-009

Keywords (choose from CPUC listing): Compliance, Solar

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.22-09-009

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 3/1/24

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and correspondence regarding this AL are to be sent via email and are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson
Title: Director, Regulatory Relations
Utility/Entity Name: Pacific Gas and Electric Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: PGETariffs@pge.com

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Clear Form

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T	East Bay Community Energy	Pacific Gas and Electric Company
Albion Power Company	Ellison Schneider & Harris LLP	Peninsula Clean Energy
Alta Power Group, LLC	Electrical Power Systems, Inc. Fresno	Pioneer Community Energy
Anderson & Poole	Engineers and Scientists of California	Public Advocates Office
Atlas ReFuel BART		Redwood Coast Energy Authority
	GenOn Energy, Inc.	Regulatory & Cogeneration Service, Inc.
BART	Green Power Institute	Resource Innovations
Buchalter		Rockpoint Gas Storage
Barkovich & Yap, Inc.	Hanna & Morton LLP	SCD Energy Solutions
Braun Blaising Smith Wynne, P.C.		San Diego Gas & Electric Company
	ICF consulting	SPURR
California Community Choice Association	iCommLaw	San Francisco Water Power and Sewer
California Cotton Ginners & Growers Association	International Power Technology	Sempra Utilities
California Energy Commission	Intertie	Sierra Telephone Company, Inc.
California Hub for Energy Efficiency	Intestate Gas Services, Inc.	Southern California Edison Company
California Alternative Energy and Advanced Transportation Financing Authority		Southern California Gas Company
California Public Utilities Commission	Kelly Group	Spark Energy
Calpine	Ken Bohn Consulting	Sun Light & Power
Cameron-Daniel, P.C.	Keyes & Fox LLP	Sunshine Design
Casner, Steve		Stoel Rives LLP
Center for Biological Diversity	Leviton Manufacturing Co., Inc.	Tecogen, Inc.
Chevron Pipeline and Power City of Palo Alto	Los Angeles County Integrated	TerraVerde Renewable Partners
City of San Jose	Waste Management Task Force	Tiger Natural Gas, Inc.
Clean Power Research		TransCanada
Coast Economic Consulting	MRW & Associates	Utility Cost Management
Commercial Energy	Manatt Phelps Phillips	Utility Power Solutions
Crossborder Energy	Marin Energy Authority	
Crown Road Energy, LLC	McClintock IP	
Communities Association (WMA)	McKenzie & Associates	Water and Energy Consulting
	Modesto Irrigation District	Wellhead Electric Company
Davis Wright Tremaine LLP		Western Manufactured Housing Communities Association (WMA)
	NOSSAMAN LLP	
Day Carter Murphy	NRG Solar	Yep Energy
Dept of General Services		
Douglass & Liddell	OnGrid Solar	
Downey Brand LLP		
Dish Wireless L.L.C.		