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February 28, 2025

**Advice Letter 4613-E  
(San Diego Gas & Electric Company ID U 902 E)**

**Advice Letter 5482-E  
(Southern California Edison Company ID U 338 E)**

**Advice Letter 7521-E  
(Pacific Gas and Electric Company ID U 39 E)**

**Advice Letter 263-E  
(Liberty Utilities (CalPeco Electric) LLC Company ID U 933-E)**

**Advice Letter 759-E  
(PacifiCorp Company ID U 901 E)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: JOINT INVESTOR-OWNED UTILITY NOTICE OF SOLAR ON MULTIFAMILY AFFORDABLE HOUSING PROGRAM FUNDING TRUE-UP FOR 2024 RECORDED GREENHOUSE GAS ALLOWANCE REVENUES PURSUANT TO DECISION 22-09-009**

San Diego Gas & Electric Company (SDG&E), Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), Liberty Utilities (CalPeco Electric) LLC (Liberty), and PacifiCorp Company (PacifiCorp) (collectively, the "Joint IOUs") hereby submit to the California Public Utilities Commission (Commission or CPUC) the following notice of final 2024 Solar on Multifamily Housing (SOMAH) funding allocations for each Investor Owned Utility (IOU).

### **PURPOSE**

This advice letter, pursuant to Ordering Paragraph (OP) 4 of D.22-09-009, establishes the final proportionate share of the \$100 million cap in annual SOMAH funding 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.

### **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 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 will be performed.

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 2024 as tracked in the IOUs' respective GHG revenue balancing account. The true-up or credit amount for 2024 is the difference between the previously approved set aside in the 2024 ERRA or ECAC filings minus the IOUs' share of the \$100 million cap. These 2024 true-up or credit amounts will be incorporated into each of the IOU's 2026 ERRA and ECAC forecast proceedings.

**TABLE 1 - All IOU's: 2024 Recorded GHG Allowance Revenue and Allocation of SOMAH Funding**

IOU	2024 Recorded GHG Proceeds	Percent Allocations of Total GHG Proceeds	Share of \$100M	Previously Approved Set Aside in 2024 ERRA or ECAC	True-up/Difference (Previously Approved Set Aside Less Share of \$100M)
SCE	\$ 819,525,543	49.4384%	\$49,438,417	\$ 46,527,856	\$ (2,910,561)
PG&E	\$590,465,930	35.6202%	\$35,620,245	\$ 39,757,379	\$ 4,137,134
SDG&E	\$ 223,523,623	13.4842%	\$13,484,209	\$ 12,015,972	\$ (1,468,237)
Liberty	\$ 5,642,442	0.34038%	\$340,384	\$631,336	\$ 290,952
PacifiCorp	\$ 18,511,924	1.11674%	\$1,116,744	\$ 1,298,822	\$ 182,078
<b>Total</b>	<b>\$ 1,657,669,462</b>	<b>100.0000%</b>	<b>\$100,000,000</b>	<b>\$ 100,231,365</b>	<b>\$ 231,365</b>

**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)
2024	\$819,525,543	\$49,438,417	\$46,527,856	\$ (2,910,561)
<b>Total</b>	<b>\$4,665,590,778</b>	<b>\$379,723,828</b>	<b>\$391,724,626</b>	<b>\$12,000,798</b>

\* This column includes both the forecast set aside and the true up amount for SCE, except for 2023.

**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

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
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	\$(11,592,609)
2023	\$544,616,174	\$34,626,367	\$39,757,379	\$(8,040,329)
2024 (c)	\$590,465,930	\$35,620,245	\$39,727,379	\$(4,137,134)
<b>Total</b>	<b>\$3,776,317,016</b>	<b>\$301,519,961</b>	<b>\$325,290,033</b>	<b>\$(23,770,072)</b>

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 is the actual set aside performed quarterly in 2022 based on the forecast approved in D.22-02-002.

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 \$8 million. In the 2024 ERRA Forecast Filing, PG&E plans to propose enacting the true-up by netting the 2023 reserve of \$8 million from the 2024 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 <sup>1</sup>	\$40,779,160	\$4,077,916	\$4,077,916	\$0
2017 <sup>2</sup>	\$92,539,677	\$9,253,968	\$9,253,968	\$0
2018 <sup>3</sup>	\$93,727,555	\$9,372,756	\$9,372,756	\$0
2019 <sup>4</sup>	\$104,156,909	\$10,415,691	\$10,415,691	\$0
2020 <sup>5</sup>	\$104,691,923	\$10,469,192	\$10,469,192	\$0
2021 <sup>6</sup>	\$161,825,842	\$14,517,611	\$14,517,611	\$0
2022 <sup>7</sup>	\$189,236,214	\$13,549,896	\$19,440,352	\$7,242,206
2023 <sup>8</sup>	\$214,387,613	\$13,630,635	\$12,015,972	\$(1,614,663)
2024 <sup>9</sup>	\$223,523,623	\$13,484,209	\$12,015,972	\$(1,468,237)

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
<b>Total</b>	<b>\$1,224,868,516</b>	<b>\$98,771,874</b>	<b>\$102,931,180</b>	<b>\$4,159,306</b>

<sup>1</sup> \$4,077,916 set-aside for 2016 ERRA approved in D.20-01-005.

<sup>2</sup> \$9,253,968 set-aside for 2017 ERRA approved in D.20-01-005.

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

<sup>4</sup> \$10,115,640 set-aside for 2019 ERRA 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.

<sup>5</sup> \$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.

<sup>6</sup> \$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.

<sup>7</sup> \$19,440,352 set-aside for 2022 SOMAH was approved in D.21-12-040. An additional \$1,351,750 was incorrectly set aside in 2023 for 2022 SOMAH, making the total 2022 SOMAH set aside \$20,792,102.

A true-up of -\$7,242,206 was approved in D.24-12-040 to correct the 2022 SOMAH true-up.

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

<sup>9</sup> \$12,015,972 set-aside for 2024 approved in D.23-12-021.

**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)
2024	\$5,642,442	\$340,384	\$631,336	\$290,952
<b>Total</b>	<b>\$36,263,588</b>	<b>\$2,977,880</b>	<b>\$3,208,873</b>	<b>\$230,993</b>

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

\*\* Liberty's set-aside for 2024 was based on the 10% of recorded GHG revenue, in the ECAC filing. The difference between the pending approval of the 2024 set aside and Liberty's portion of the \$100 million limit is to be requested in Liberty's ECAC application.

\*\*\*Liberty assumes the 10% 2024 set-aside will be approved and transferred in 2025.

**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
2024	\$18,511,924	\$1,116,745	\$1,298,822*	\$734,447
<b>Total</b>	<b>\$111,802,277</b>	<b>\$9,671,071</b>	<b>\$8,838,866</b>	<b>\$1,018,987</b>

\* PacifiCorp's 2024 Previously Approved Set Aside in the 2024 ECAC was the amount from Table 2 in D.22-09-009. However, PacifiCorp's set aside based on quarterly transfer of precisely 10% of the Company's GHG revenues led to an actual set-aside of \$1,851,192. The annual difference in the final column is therefore the difference between this real-time set-aside total less PacifiCorp's share of the \$100 million cap.

### **EFFECTIVE DATE**

SDG&E believes this submittal is subject to Energy Division disposition and should be classified as Tier 1 (effective pending disposition) pursuant to GO 96-B and Decision D.21-03-056. SDG&E respectfully requests that this submittal become effective on February 28, 2025, which is the date of this submittal.

### **PROTEST**

Anyone may protest this advice letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be submitted electronically and must be received by March 20, 2025, which is 20 days from the date this Advice Letter was submitted with the Commission. There is no restriction on who may file a protest.

The protest should be sent via e-mail to the attention of the Energy Division at [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov). A copy of the protest should also be sent via e-mail to the address shown below on the same date it is delivered to the Commission.







# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person:

Phone #:

E-mail:

E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas      WATER = Water  
PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type:  Monthly     Quarterly     Annual     One-Time     Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

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:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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:

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<sup>1</sup>Discuss in AL if more space is needed.



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

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
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General Order No. 96-B  
ADVICE LETTER SUBMITTAL MAILING LIST

Public Utilities Commission  
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Regulatory

Barkovich & Yap, Inc.

B. Barkovich

Biofuels Energy, LLC

K. Frisbie

Braun & Blaising, P.C.

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CalCCA

Regulatory

CA Dept. of General Services

H. Nanjo

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California Farm Bureau Federation

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California Wind Energy

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N. Pedersen

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SD Community Power

L. Fernandez  
L. Utouh

Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

C. Frank

SPURR

M. Rochman

Southern California Edison Co.

K. Gansecki

TerraVerde Renewable Partners LLC

F. Lee

TURN

M. Hawiger

UCAN

D. Kelly

US Dept. of the Navy

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D. Bogni

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Service List

R.14-07-002