

Single-family Affordable Solar Homes (SASH) Program

Semi-annual Progress Report



July 2020



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1. Program Summary

The Single-family Affordable Solar Homes (SASH) Program is one of the California Solar Initiative's (CSI) two low-income solar programs. GRID Alternatives (GRID), a non-profit solar contractor, is the statewide Program Administrator for the SASH Program. The SASH incentive is available to qualifying low-income homeowners in the Pacific Gas and Electric (PG&E), Southern California Edison (SCE), and San Diego Gas and Electric (SDG&E) Investor-Owned Utility (IOU) service territories.

The SASH Program is uniquely designed to be a comprehensive low-income solar program. In addition to providing incentives, SASH is structured to promote or provide energy efficiency, workforce development and green jobs training opportunities, and broad community engagement with low-income communities. There is no other solar program in California that has such a diverse range of benefits for low-income communities. It is truly a first-of-its-kind solar program.

The SASH incentive provides low-income families with free or low-cost solar photovoltaic (PV) systems that significantly reduce household energy expenses and allow families to direct those savings toward other basic needs. GRID Alternatives' volunteer-based installation model has proven to be a highly efficient model that makes solar affordable for low-income homeowners while also creating valuable job training opportunities. In addition to being the primary installer for SASH, GRID provides education on and access to energy efficiency programs that further reduce a household's energy consumption and expenses.



In implementing the SASH Program, GRID Alternatives provides opportunities for local volunteers to assist with installations, engage their communities, and to participate in CA energy programs. GRID has trained over 44,030 volunteers and job trainees in California to help promote and install solar in low-income communities since the inception of the SASH Program. GRID requires its volunteers to participate in a solar

orientation program that educates these potential solar adopters about solar PV and energy efficiency.

This basic consumer education program can help enhance state goals of promoting the use of solar PV technology and helping build broad-based community support for solar electric technologies and energy efficiency statewide.

Finally, SASH provides a foundation for promoting and building a sustainable solar industry in California by incorporating a workforce development and job training component into the program. GRID partners with local job training programs to give their trainees an opportunity to get hands-on installation experience. The SASH Program also promotes partnerships between solar contractors and local workforce development programs by including a job training requirement for all sub-contracted SASH projects. This is a double benefit to low-income communities since many green-collar job trainees come from the same communities that the SASH Program aims to serve.

2. Background

In 2006, the California Assembly Bill 2723 directed that no less than ten percent of the overall CSI funding be directed towards programs assisting low-income households in obtaining the benefits of solar technology. In D.07-11-045, the Commission established the \$108.34 million SASH Program as a component of the CSI Program. The SASH Program provides incentives “for homeowners who occupy their homes and meet the definition of low-income housing established in Public Utilities Code Section 2852.”¹ The overall goal of the SASH Program established in D.07-11-045 is “to provide existing low-income single family homes with access to photovoltaic (PV) systems to decrease electricity usage and bills without increasing monthly household expenses.”²

Assembly Bill 217 (Bradford, 2013) extended the SASH Program and its sister program, the Multi-family Affordable Solar Housing (MASH) Program, from their scheduled sunsets in 2016 with \$108M in new funding, split between programs, and coupled with new program objectives. In D.15-01-027, the Commission delineated that GRID Alternatives will continue to administer the SASH Program and established revised program requirements for energy efficiency, job training, and a modified incentive

¹ D.07-11-045, Appendix A, p.1.

² D.07-11-045, Appendix A, p.1.

structure.³ Resolution E-4719, approved June 25th, 2015 by the Commission, allows for a unique third-party ownership (TPO) model in SASH under AB 217's funding. The TPO model has been deliberately designed to maximize household savings and include consumer protection measures as required in D.15-01-027.⁴ The SASH Program extended under AB 217 with an additional \$54M in funding will operate either until December 31, 2021, or until all funds available from its incentive budget have been encumbered, whichever event occurs first. For ease of reading this report, the original SASH allocation of \$108M with D.07-11-045 is referred to as "SASH 1.0" and the reauthorized SASH program with \$54M in additional funding through D.15-01-027 is referred to as "SASH 2.0." Complete details of the SASH Program can be found in the SASH Program Handbook⁵ or at www.gridalternatives.org/sash.

³ D.15-01-027, p.12-14; 44-48.

⁴ Resolution E-4719, June 15, 2015, and D.15-01-027, Minimum Consumer Protection standards for SASH TPO model, at pgs. 52-53. D.15-01-027 online at <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M145/K938/145938475.PDF>.

⁵ www.gosolarcalifornia.ca.gov/documents/SASH_Handbook.pdf

3. Q1-Q2 2020 Update

In the first half of 2020, the SASH Program posted strong results with over 600 kW, CEC-AC of solar electric capacity interconnected for the direct benefit of nearly 200 CA low-income homeowners. This outcome is particularly notable given the acute impacts of the COVID-19 pandemic on GRID's standard operations, and the broad modifications GRID implemented in its processes to allow for safe installations during this unprecedented time.

COVID-19 Impacts: GRID followed, and continues to follow, and adapt to all federal, state and local guidance and directives from relevant authorities in order to execute SASH solar installations, as well as marketing and outreach activities, that are safe for its clients, community members, and installation staff. Because solar is considered an essential service by the state,⁶ GRID continued offering the benefits of the SASH program to participants, albeit with modifications to comply with relevant orders.

Under COVID, GRID made significant adjustments to its processes, especially related to marketing and outreach, on-site installation practices, and hosting volunteers and trainees on-site. For example, GRID developed remote outreach capabilities, solar installations that could be completed with "no-contact" with the homeowner, and temporarily eliminated volunteers and group job training on-site. Specifically to address limits in-person group training due to COVID-19, GRID submitted Advice Letter (AL) 15, *Proposed Modifications related to the Program's Job Training Requirements in Response to the COVID-19 Pandemic* on June 26, 2020 to request a waiver of job training requirements in up to 10% of SASH projects. The AL was approved and became effective on July 10, 2020 and will be in effect until July 10, 2021. To date, GRID has not used the waiver but will report in future semi-annual progress reports about how often this waiver is used. YTD in 2020, GRID has experienced a ~30% reduction in the volume of SASH installations due to COVID-related delays and impacts.

Milestones and Stats: In Q4 2019, SASH 2.0 incentives in PG&E's service territory became fully reserved, and SASH 2.0 incentives in SDG&E's utility territory were recently fully encumbered in June 2020; these milestone announcements have been posted on GRID's SASH program webpage. SASH 2.0 Incentives in SCE territory are predicted to be fully reserved in late 2021, near the SASH program's official deadline of

⁶ [www.energy.ca.gov/news/2020-04/state-clarifies-solar-photovoltaic-and-energy-storage-installers-essential#:~:text=The%20California%20Energy%20Commission%20\(CEC.photovoltaic%20and%20energy%20storage%20installers](http://www.energy.ca.gov/news/2020-04/state-clarifies-solar-photovoltaic-and-energy-storage-installers-essential#:~:text=The%20California%20Energy%20Commission%20(CEC.photovoltaic%20and%20energy%20storage%20installers)

December 31, 2031 to reserve project incentives. At the end of Q2 2020 4,044 PV projects have been installed and interconnected using the SASH 2.0 incentive budget overall, 51 projects have been reserved and are awaiting installation or interconnection, and another 70 applications have been submitted and are under review, per Table 4 in this report.

GRID continued implementing the SASH Program’s Third-Party Ownership (TPO) model which provides additional funding for projects, thereby increasing the number of qualified families who can take advantage of the program. The SASH program’s TPO model is uniquely structured to be a “families-first” model that maximizes homeowner benefit and champions consumer protection.⁷ Of the SASH 2.0 projects installed to date, roughly 75% have utilized the TPO model, as illustrated in Chart 3 of this report.

The SASH Program provides direct economic benefits to participating families, and adds value to the industry with green job training and broad consumer education. Each SASH project contains a workforce development component and provides opportunities for job trainees and volunteers to get hands-on experience installing solar systems. Every SASH installation typically includes either a team of volunteers from the local community or graduates from job training programs. In addition, each sub-contracted installation requires at least one job trainee to participate in the project, as a paid worker learning valuable skills. These job training opportunities form the backbone of SASH and create lasting value in local communities by helping foster a new green workforce – a workforce of skilled laborers, many hailing from the same communities that SASH aims to serve – that will have high employability in California’s solar job sector.



⁷ Resolution E-4829, March 2, 2017.

4. Budget

The original SASH Program budget from D.07-11-045 is \$108.34 million. D.15-01-027 extended the SASH Program with an additional \$54 million, bringing the total SASH Program budget to \$162.34 million. The program is funded by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) according to these percentages:

Table 1: Budget Allocations by Utility Territory

	PG&E	SCE	SDG&E	Total
Budget %	43.7%	46%	10.3%	100%
Budget (\$ in millions) in D.07-11-045 (SASH 1.0)	\$47.34	\$49.8	\$11.2	\$108.34
Extended Budget (millions) in D.15-01-027 (SASH 2.0)	\$23.59	\$24.84	\$5.57	\$54.00
Total Budget (millions) (Entire SASH Program)	\$70.93	\$74.64	\$16.77	\$162.34

The SASH Program budget is allocated between program functions, as detailed in Table 2 below.

Table 2: Budget Allocations by Program Function

	Budget, %	Budget, \$ D.07-11-045 SASH 1.0	Budget, \$ D.15-01-027 SASH 2.0	Expensed thru Q2 2020
Incentives	85%	\$92,089,000	\$45,900,000	\$92,049,369 (SASH 1.0) ⁸ \$39,092,120 (SASH 2.0)
Administration	10%	\$10,834,000	\$5,400,000	\$15,757,335
Marketing & Outreach	4%	\$4,333,600	\$2,160,000	\$5,986,906
Evaluation	1%	\$1,083,400	\$540,000	Budget resides w/ CPUC
Total	100%	\$108,340,000	\$54,000,000	\$152,885,731

⁸ Decision 07-11-045 states that "...the program [SASH 1.0] should operate through December 31, 2015, and any unspent money on January 1, 2016, shall be used for cost-effective energy efficiency measures in low-income residential housing, as set forth in Section 2852" Conclusion of Law #4, p.44.

5. Program Growth and Project Details

Tables 3 and 4 below summarize the status of all SASH applications through Q2 2020.

Table 3: SASH 1.0 Applications by Status and Service Territory

Application Status	Number of Applications				Total kW, (CEC-AC)	Total Incentives, \$ millions
	PG&E	SCE	SDG&E	Totals		
STEP 1: Applications under review	0	0	0	0	0.0*	\$0.0*
STEP 2: Confirmed Applications/Reservations	0	0	0	0	0.0	\$0.0
STEP 3: Completed/Installed	2,293	2,412	559	5,264	16,044	\$92.05
TOTALS	2,293	2,412	559	5,264	16,044	\$92.05

Table 3: Last updated in early 2016, due to the program's close date of December 31, 2015.

* Step 1 system sizing (kW) and incentives (\$) for SASH 1.0 projects are estimates based on an average system size of 2.9kW, CEC-AC and incentive level of \$6.00/W. System designs are not completed until the Applicant is confirmed to meet all other program requirements. The majority (>90%) of projects in Step 1 will receive Step 2 reservations.

Table 4: SASH 2.0 Applications by Status and Service Territory

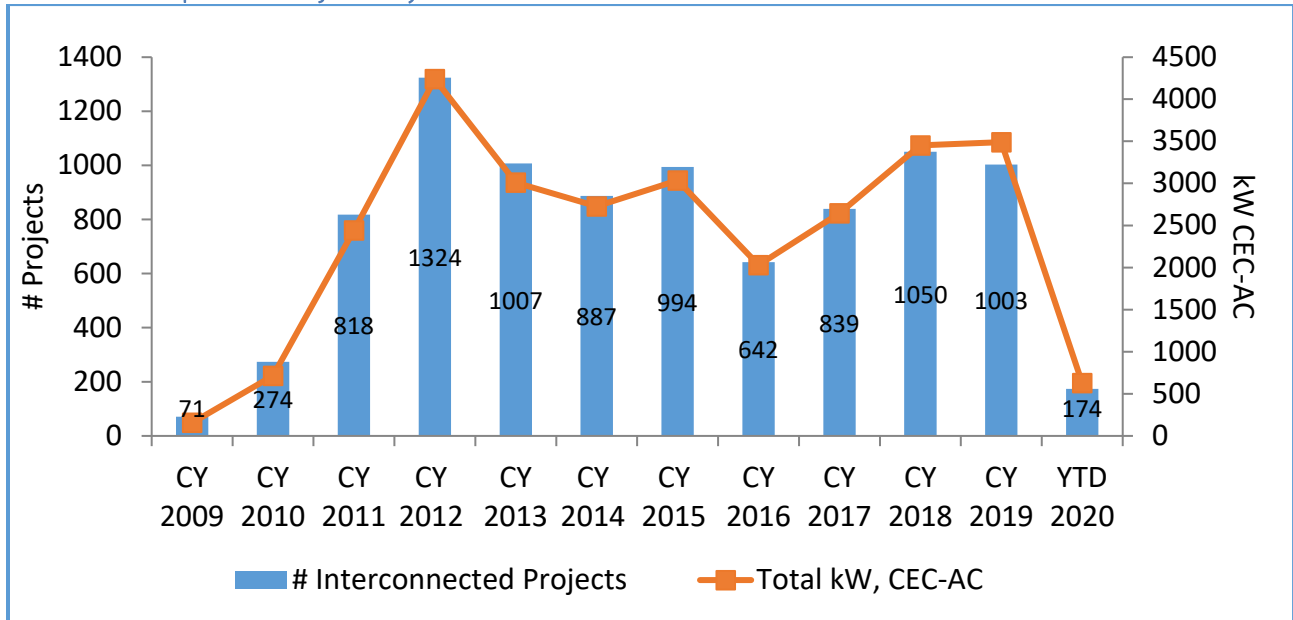
Application Status	Number of Applications				Total kW, (CEC-AC)	Total Incentives (\$ millions)
	PG&E	SCE	SDG&E	Total		
STEP 1: Applications under review	0	70	0	70	245.0*	\$0.74
STEP 2: Confirmed Applications/Reservations	0	49	2	51	193.4	\$0.58
STEP 3: Completed/Installed	2,126	1,416	502	4,044	13,202.0	\$39.59
TOTAL	2,126	1,535	504	4,165	13,640.4	\$40.91

Table 4: Data collected 07/06/20

* Step 1 system sizing (kW) and incentives (\$) for SASH 2.0 projects are estimates based on an average system size of 3.5kW, CEC-AC and incentive level of \$3.00/W. System designs are not completed until the Applicant is confirmed to meet all other program requirements. The majority (>90%) of projects in Step 1 will receive Step 2 reservations.

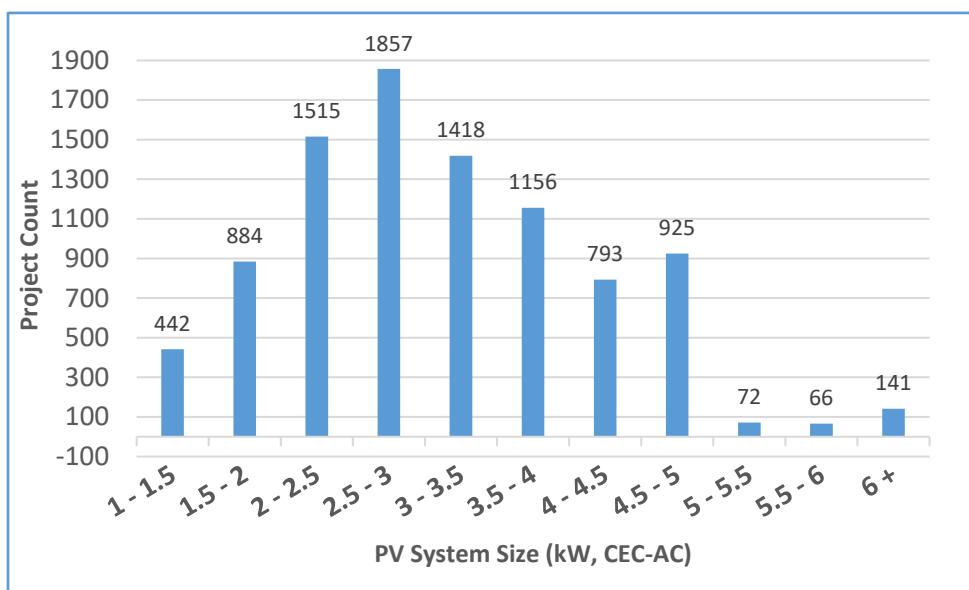
Below, Chart 1 illustrates the progress of the SASH Program since 2009. Over 9,200 projects have been installed and completed (i.e. interconnected to the electric utility) through Q2 2020. In recent quarters, installations have decreased overall as PG&E incentives became encumbered in Q4 2019. Completed project totals continued to decline in 2020 as SDG&E's incentives became encumbered in June 2020.

Chart 1: Completed Projects by Year



Below, Chart 2 indicates that over half of installed SASH solar PV systems are 3kW CEC-AC or smaller, and the average installed project is 3.5kW CEC-AC. Where the system size is not constrained by roof space, SASH system sizing is based upon the client’s annual usage (kWh) minus the energy efficiency savings the client may realize by adopting basic energy efficiency measures. SASH systems are capped at 5kW.

Chart 2: Installations by System Size



6. Incentives and Project Financing

The SASH Program is designed to be a comprehensive low-income program, and serve homeowners in the most distressed and impoverished areas of California. Roughly 80% of SASH clients qualify for the California Alternate Rates for Energy (CARE) Program that offers reduced electric rates to income-qualified households. This demonstrates that the SASH Program is primarily serving homeowners at the lowest income levels who most need the savings provided from solar electric systems. Because CARE uses 200% of the Federal Poverty Level as its income limit (whereas SASH uses 80% of Area Median Income or AMI), GRID observes more SASH clients from lower cost-of-living counties qualify for CARE than those in higher cost-of-living counties. GRID consults with homeowners who have a financing gap between their system costs and available incentive to explore individual financing options, such as a client contribution or private loan, and has experienced limited success with this challenge. In all instances in recent years, GRID has aided in overcoming the gap financing obstacle for families by contributing the organization's own non-profit fundraising dollars and additional resources toward covering the gap between the available incentive and the project costs, thereby allowing more families to go solar with the SASH Program than otherwise would have been able to do so.

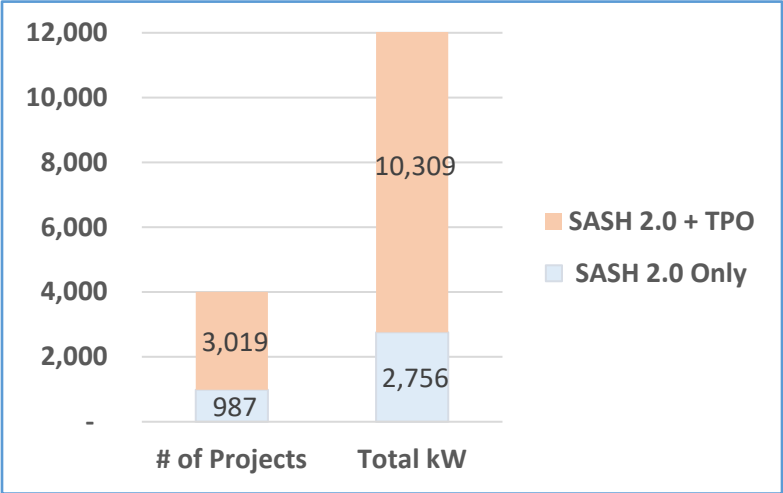
GRID's contributions toward covering these financing gaps include: general philanthropy, in-kind equipment donations, proceeds from a third-party ownership model, and corporate sponsorships. GRID's long-standing partnerships with major equipment manufacturers including Enphase Energy, and SMA Solar – renewed for 2020 – continue to help cover many SASH clients' gap funding requirements, and GRID expects to utilize philanthropic and in-kind contributions from donors and sponsorships to augment gap financing efforts for the duration of the SASH Program. Given tight economic conditions in many low-income communities, and the inability for most households to assume more debt, gap financing remains a potential obstacle for low-income families to participate in the SASH Program.

Through its unique families-first TPO model, GRID is able to leverage the federal Investment Tax Credit (ITC) to help finance SASH 2.0 projects, while providing additional benefits to participating families, including a performance guarantee, system monitoring, and 25-year warranty coverage. In 2017 GRID began partnering with Sunrun to further expand its third-party ownership (TPO) model for

SASH 2.0 as approved by the Commission in Resolution E-4829. GRID’s TPO partnership with Spruce Finance is ongoing, though all 2020 TPO installations and future systems are planned to be financed with partner company Sunrun. As demonstrated in Chart 3, of the 4,006 total SASH 2.0 projects completed, 3,019 are third-party owned or roughly 75% of the total SASH 2.0 kW (CEC-AC) capacity installed.⁹

Chart 3, below, illustrates that the majority of the 3,019 SASH 2.0 projects to date are third-party owned and it is expected that the TPO model will continue to be a significant contributor to financing SASH 2.0 projects.

Chart 3: SASH 2.0 Projects with Third-Party Ownership (TPO)



7. Marketing and Outreach

GRID Alternatives currently has eight California regional offices, located in Oakland (PG&E), Willits (PG&E), Los Angeles (SCE), San Diego (SDG&E), Fresno (SCE/PG&E), Riverside (SCE), Chico (PG&E), and Sacramento (PG&E). The map below shows the location of all pending or completed SASH applications through Q2 2020. It illustrates that GRID has qualified SASH applicants over a wide range of geographic areas throughout the utility territories.

⁹ SASH 2.0 projects that do not utilize the TPO model are typically those located on tribal lands, or that are less than 2kW, and thus do not qualify.

Map 1: All SASH projects through Q2 2020, by CA County

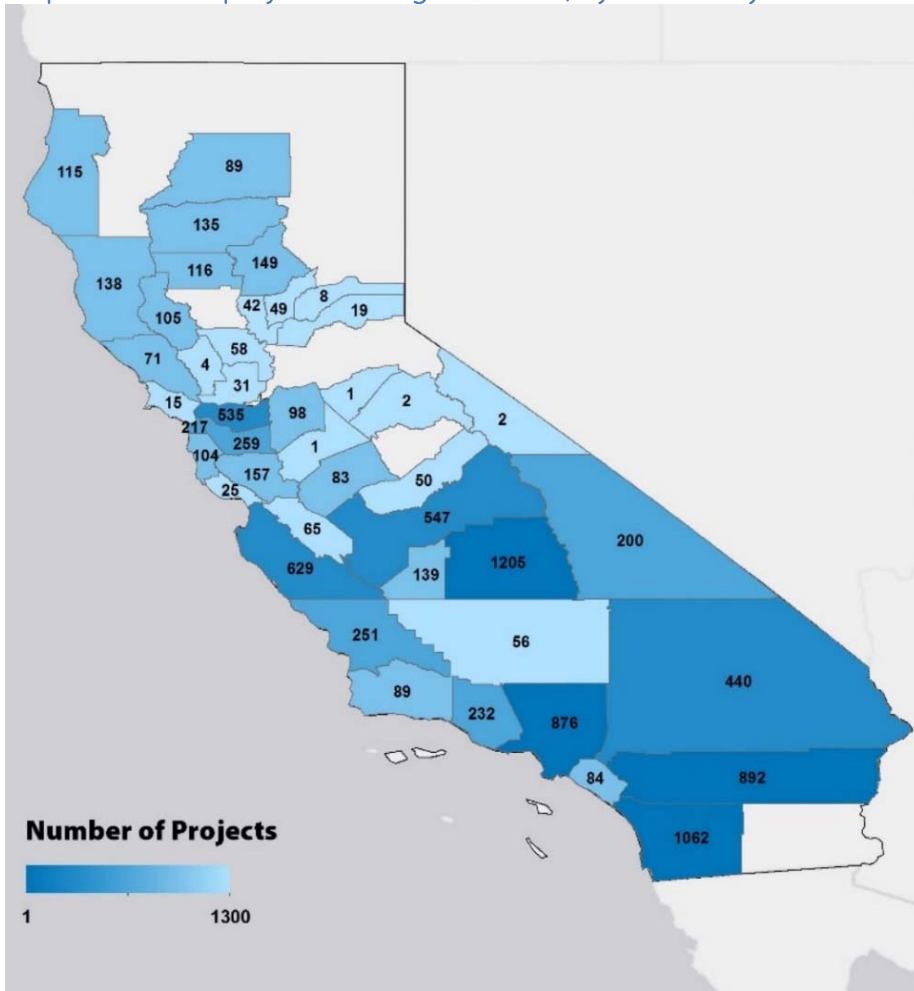
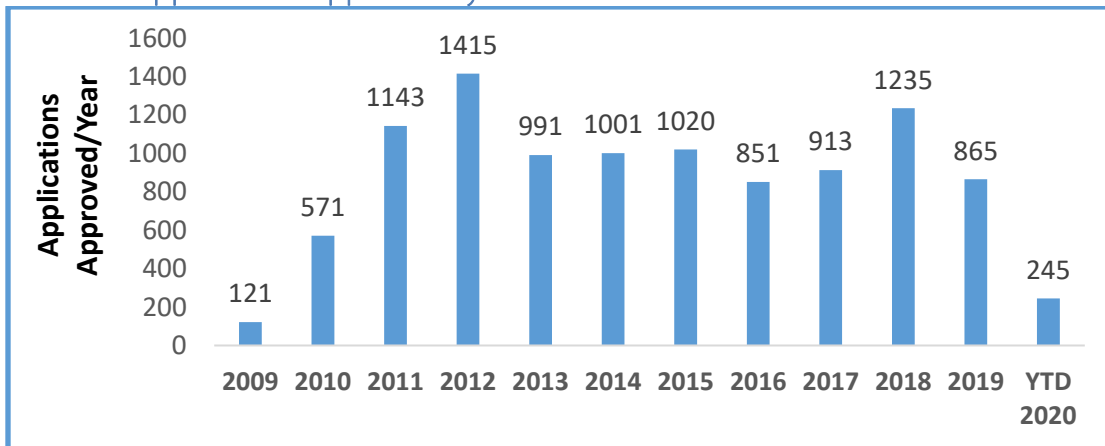


Chart 4 below shows that GRID processed and approved 245 applications from eligible SASH clients in the first half of 2020, bringing the total number of approved SASH applications to 10,371. In recent quarters, approved applications have decreased as PG&E incentives became encumbered in Q4 2019. Total applications continued to decline in 2020 as SDG&E’s incentives became encumbered in June 2020.

Chart 4: Applications Approved by Year



GRID Alternatives' statewide staff continue to utilize many of the marketing and outreach methods proven to be effective for recruiting SASH clients and building SASH brand recognition since the inception of the SASH Program. These activities include: leveraging partnerships with organizations trusted by low-income homeowners, offering consumer education sessions, and increasing community exposure to SASH through events, media and marketing collateral. GRID has found co-marketing with an entity such as a city, county, or utility to compile a co-mailer mailed directly to target populations to be a highly effective method to create interest from prospective participants.

GRID also leverages its existing relationships with key community partners to spearhead outreach efforts in low-income communities. GRID garners support and participation from adopters of the SASH Program to discuss their experiences with neighbors and acquaintances and encourage them to contact GRID. Oftentimes in the past, a former SASH client will invite neighbors and GRID outreach staff to a meeting at their own home to help promote the SASH Program in their neighborhood. Involving neighbors, volunteers, and civic supporters at SASH installations helps build the SASH brand recognition on-the-ground in low-income communities, and also for a wide audience of stakeholders.

8. Volunteer and Workforce Development

GRID Alternatives' unique volunteer-based installation model and organization-wide focus on green jobs training has made every SASH project a workforce development opportunity for a broad range of professional interests. GRID Alternatives has created 84,090 installation workday positions for volunteers in California since the inception of the SASH program. Over 19,366 of these positions have been filled by groups of students from CA job training programs. These volunteer and job training opportunities help strengthen California's solar industry by providing broad consumer education and a means for individuals from diverse backgrounds to learn about PV-solar design and installation through hands-on experience. Volunteer and training opportunities help create the solar market transformation sought through the California Solar Initiative. These opportunities also create a well-informed public, and proof that the technology can be adopted by everyone in different types of communities in California.

GRID ensures that the volunteers on SASH projects are adequately trained in safety and installation techniques and understand the basic fundamentals of the SASH Program, the California Solar Initiative, and the benefits of PV-solar by requiring all volunteers to attend a mandatory volunteer orientation. GRID Alternatives has trained over 44,030 community volunteers in these pre-installation orientations and the majority have gone on to participate in a SASH installation. Volunteers and job trainees form the backbone to GRID's installation model and are an important part of the overall success of the SASH Program.

GRID Alternatives has incorporated "green job" training and workforce development initiatives into the SASH Program with the following initiatives:

- **Integration of hands-on solar installation experience into low-income job training programs.** GRID Alternatives presently partners with 22 active job training organizations (JTOs) and has worked with 80 California job JTOs¹⁰ in the past to incorporate its volunteer-based installation projects into their construction training curricula. GRID dedicates approximately 20% of its internal installations to these trainees to gain hands-on experience with real-world solar installations that have conditions and requirements comparable to what they would encounter in private industry. This becomes a double benefit to the low-income community, since many solar job trainees come from the same neighborhoods that the SASH Program aims to serve.
- **The Installation Basics Training (IBT) program awards trainees with certificates for industry-relevant skills learned under the supervision of GRID’s professional solar installation staff.** GRID’s Installation Basics Training (IBT) program provides job trainees’ valuable hands-on training, support for development of a specific skillset solicited by employers, and access to potential employment opportunities. IBT trainees earn certificates by demonstrating their competency on specific skills while working on installations. GRID currently offers 10 Skills Certificates that cover a variety of array and electrical skills. To earn all 10 Skills Certificates, IBTs typically need to dedicate 130-300 hours in the field (8-20 complete installations). Employment opportunities for IBT trainees include on-site networking opportunities with corporate sponsors, referrals to companies hiring for installation positions in the solar industry, and access to GRID’s Resume Bank, which connects job seekers and employers. Graduates of the IBT Program may advance to Team Leader status to further improve their technical skills and gain leadership experience.
- **Team Leader and hands-on opportunities for job trainees.** In addition to reserving entire



¹⁰ Job Training Organizations (JTOs) included are those that are considered active JTO partners that GRID has worked directly with on SASH installations in the last 2 years.

installations for job training partnerships, GRID gives individual job trainees priority to participate on volunteer installations. Job trainees can also participate in GRID's "Team Leader Program" that provides leadership roles on its volunteer installations. GRID has 768 volunteers who have been trained as Team Leaders and are available to improve their skills and gain valuable leadership experience on installations in California. The Team Leader initiative gives job trainees the opportunity to get critical, hands-on PV-installation experience required by most solar contractors.

- **GRID Team Leaders may apply their experience toward NABCEP certification.**

The North American Board of Certified Energy Practitioners (NABCEP) is widely recognized as the leading certification for solar energy professionals. An individual pursuing NABCEP's PV solar installer certification must meet the Board's minimum requirement of leading five PV solar installations in order to sit for the certifying



exam. One of the auxiliary benefits for GRID Team Leaders is that their experience working directly under professional installers while leading other volunteers can be applied toward meeting this NABCEP requirement for certification.

- **Paid work and job placement opportunities for training program graduates.** Students or graduates of JTOs may receive short-term paid work and opportunities for long-term job placement in the solar PV industry through the SASH Sub-Contractor Partnership Program (SPP). Trainees from 50 different CA job training programs have worked alongside experienced installers from 54 for-profit companies to install SASH systems. These opportunities provide the job trainees and the contractors with extended, paid "field interviews" where the trainees can be evaluated for available long-term installer positions within the company. Since the inception of the SPP, over 2,346 paid job opportunities have come to fruition for 264 unique California trainees through SPP installations. Although the minimum requirement is to hire one job trainee per SPP installation, 17% of SPP installations have had two or even three job trainees on site.
- **General volunteer opportunities.** Over 44,030 individual volunteers have completed GRID's

volunteer/solar orientation in California since the commencement of the SASH Program. The orientation program allows GRID to promote solar energy and educates volunteers on solar technologies, the importance of energy efficiency, and the CSI incentive programs. Individuals who complete the volunteer/solar orientation leave not only with eligibility to work on SASH installations, but also with heightened knowledge about the solar industry and the SASH Program that can motivate them to be solar advocates in their own communities.

Though GRID has incorporated job training into every SASH project since the program inception in 2009, with the addition of SASH 2.0 requirements under to D. 15-01-027, GRID is reporting on specific types of attendees, including ensuring that each volunteer-based installation include either one Solar Corp, one Team Leader, or three students from a job training organization.¹¹ This further enhances the job training opportunities created by the SASH program.

In June 2020, GRID submitted Advice Letter (AL) 15 to propose two modifications to the program's job training requirements. The AL was approved on July 10, 2020. First, GRID proposed creating a waiver process for SASH job training requirements, to be used on a limited basis for up to 10% of projects, due to COVID-10 social distancing requirements for up to 12 months. The AL also permanently aligns job training requirements between the SASH and DAC-SASH programs, with two new types of job training categories now allowed for SASH as well. These are listed below:

- Three (3) or more participants in Installation Basics Training (IBT); or
- One (1) Design and Construction Intern

¹¹ D.15-01-027, requirements for volunteer-based installations on pg. 21. Requirements for SPP installations include an affidavit signed by subcontractor and job trainee, and specific reporting requirements, on pg. 23.

9. Energy Efficiency

Energy efficiency (EE) remains an important part of the SASH program and the mission of GRID Alternatives. GRID believes that energy efficiency is the essential first step to implement in clients' homes before installing PV solar. To this end, GRID conducts an energy efficiency education and training session for every SASH applicant. GRID works with the Energy Savings Assistance Program (ESAP) administrators to refer and enroll eligible homeowners, and with the IOUs to streamline ESAP enrollment for SASH clients. Per D. 15-01-027, GRID includes in Appendix A the required data for ESAP enrollment for SASH 2.0 participants under AB 217 funding. Table 5 below summarizes the number of SASH applicants who were referred to the IOUs for enrollment into ESAP through Q2 2020.

Table 5: ESAP Referrals by Utility

Utility	Total
PG&E	4,558
SCE	4,861
SDG&E ¹²	835
Total	10,254

¹² Due to a modification in the data sharing process between SDG&E and GRID and a subsequent delay, the SDG&E referral and enrollment numbers are not higher than the previous report. GRID's modified referral process with SDG&E has been implemented and ESAP referrals will increase in future quarters in SDG&E territory.

APPENDIX A
Data Annex

Confidential to CPUC per D. 15-01-027