

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 24, 2023

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Subject: Staff Disposition of Pacific Gas & Electric Company's (PG&E) Advice Letter (AL) 4713-G/6860-E Third- Party Local Government Partnerships Program contract amendments, executed between seven Local Government Partners and PG&E

Dear Mr. Dietz,

The California Public Utilities Commission's (CPUC) Energy Division (ED) approves PG&E's AL 4713-G/6860-E with an effective date of March 23, 2023.

Protests

No protests to this AL were filed.

Background

On February 10, 2023, Pursuant to Ordering Paragraph (OP) 2 of Decision (D.) 18-01-004, the Third-Party Solicitation Process Decision, PG&E filed its Local Government Partnerships Program Contract Amendments Advice Letter.

Decision D.18-01-004 requires the four California Investor-Owned Utilities (IOUs) to file a Tier 2 advice letter for any third-party contracts that are valued at \$5 million or more and/or that have contract terms of longer than three years¹. The contract amendment in this advice letter incorporates the CPUC third-party contract terms and extends the contract with seven Local Government Partnerships until the end of 2025. Due to the new total contract budget of \$17,161,511 exceeding the \$5 million threshold, this contract amendment requires a Tier 2 advice letter.

Discussion

In operationalizing the review of third-party advice letter contract amendments, EE Staff focused its review on the reasonableness of the contract amendment, CPUC intent on how to use these funds, size of contract budget, forecasted savings, and the contract's contribution to the portfolio-level cost-effectiveness requirements. Approval of this advice letter is not evidence of CPUC approval of ongoing or future program implementation. It is PG&E's responsibility to manage its portfolio to ensure it remains in compliance with its approved business plan and all CPUC Decisions.

¹ D.18-01-004, pg.57

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*Implementation Plan Development*

Decision D.18-05-041, the Business Plan Decision, Ordering Paragraph 2 requires implementation plans to be posted within 60 days of contract execution, or within 60 days of CPUC approval if the contract meets the advice letter threshold. With the issuance of this disposition, the implementation plans for these amended programs are due to be updated and posted no later than May 22, 2023.

Please direct any questions regarding Energy Division's findings in this disposition to Ely Jacobsohn (Ely.Jacobsohn@cpuc.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Leuwam Tesfai", followed by the word "FOR" in a simple, blocky font.

Leuwam Tesfai
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division
California Public Utilities Commission

Cc: Service List R.13-11-005
Simon Baker, Energy Division
Jennifer Kalafut, Energy Division
Alison LaBonte, Energy Division
Jessie Levine, Energy Division
Ely Jacobsohn, Energy Division

February 10, 2023

Advice 4713-G/6860-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Advice Letter Submittal of Pacific Gas and Electric Company's Third-Party Local Government Partnerships Program contract amendments, executed between seven Local Government Partners and PG&E

Purpose

In compliance with Decision (D.) 18-01-004, Pacific Gas and Electric Company ("PG&E") hereby requests the California Public Utilities Commission's ("Commission" or "CPUC") approval of the amendments to Energy Efficiency ("EE") Local Government Partnerships Program;

- Contract executed between PG&E and City/County Association of Governments;
- Contract executed between PG&E and San Joaquin Valley Clean Energy Organization;
- Contract executed between PG&E and County of Marin;
- Contract executed between PG&E and Redwood Coast Energy Authority;
- Contract executed between PG&E and Sierra Business Council;
- Contract executed between PG&E and County of Sonoma;
- Contract executed between PG&E and The Energy Coalition.

The initial contracts for the Local Government Partnerships program were solicited in 2019 and contributed to PG&E's 25 percent compliance target, however they did not initially trigger the need for an Advice Letter. The contract amendments that are the subject of this advice letter serve to extend each program (granting additional budget), refresh labor rates to present day, and update the Key Performance Indicators used to measure program performance. Due to the increased contract budget and duration, these contract amendments require CPUC approval via Tier 2 advice letter approval.

Background

In Decision (D.) 15-10-028, the Commission established and adopted the Rolling Portfolio process for regular review and revision of the EE program administrators' (PAs') portfolios. In August 2016, the Commission adopted D.16-08-019, which defined the

terms and the requirements for the utility PAs to administer statewide and third-party programs.

Under the framework of the rolling portfolio, the Commission adopted D.18-01-004 for procurement of EE programs through a solicitation process. That Decision directed the investor-owned utilities (“IOUs”), including PG&E, to meet specific third-party outsourcing targets by certain dates in order to transition to a majority third-party-implemented portfolio by 2023. Specifically, D.18-01-004 and D.18-05-041 ordered the IOUs to have at least 25 percent of their 2020 program budgets under contract for programs designed and implemented by third-party providers by December 19, 2019¹, at least 40 percent by December 31, 2020, and at least 60 percent by December 31, 2022. Additional details are provided in the Public Section of this Advice Letter.

Compliance Requirements

Per D.18-01-004, the IOUs are required to file a Tier 2 advice letter for each EE third-party contract that is valued at \$5 million or more and/or with a term longer than three years.

The Commission developed a template which outlines the required information and documentation for each third-party advice letter submission. The table below provides a list of the required content and indicates where PG&E is providing the content within this submission.

Table 1: Required Content for Advice Letter Submission

	Contents, Attachments, and Appendices	Part 1 Public	Part 2 Confidential
1	Introduction: Purpose and Subject (Summary of Contracts)	Part 1.1.A- 1.1.B	Appendix D
2	Introduction: Solicitation Process Overview	Part 1.1.C	Appendix B
3	Transition Plan	Part 1.2	
4	Confidentiality	Part 1.3	
5	Final IE Report	Attachment A	Appendix A
6	Program-Level Measurement & Evaluation (M&V) Plan for NMEC programs seeking exceptions to the NMEC Rules	Attachment B	
7	Selection spreadsheet (in Excel)		Appendix C
8	Executed third-party contracts		Appendix E

¹ D.18-05-041 OP (4). PG&E was granted an extension to June 30, 2020.

The public version of this advice letter is provided to the service lists for Rulemaking (“R.”) 13-11-005. The confidential version of the advice letter is provided only to the Commission.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than March 2, 2023, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name and e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.2, and OP 2 of D.18-01-004, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, March 12, 2023, which is 30 calendar days after the date of submittal.

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.13-11-005. 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

cc: R.13-11-005 Service List



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 M)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Stuart Rubio

Phone #: (951)965-8905

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: stuart.rubio@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) #: 4713-G/6860-E

Tier Designation: 2

Subject of AL: Advice Letter Submittal of Pacific Gas and Electric Company's Third-Party Local Government Partnerships Program Contract Amendments, Executed Between Seven Local Government Partners and PG&E

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.18-01-004

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: See confidential Declaration and Matrix
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: Matthew Braunwarth, Matthew.braunwarth@pge.com

Resolution required? Yes No

Requested effective date: 3/12/23

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: (415)973-2093
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

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 M)**

1. I, Matthew Braunwarth, am the manager of Energy Efficiency procurement department at Pacific Gas and Electric Company (“PG&E”), a California corporation. Aaron August, the Vice President, Utility Partnerships & Innovation of PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company
300 Lakeside Dr.
Oakland, CA 94612

2. PG&E will produce the information identified in Paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request. Name or Docket No. of CPUC Proceeding (if applicable): Application 17-01-013 and R. 13-11-005.

3. Title and description of document(s): 4.0 Confidential Appendix A Final IE Report LGP.pdf; 5.0 Confidential Appendix B Solicitation Process Overview; 6.1 PGE Solicitation Selection Spreadsheet LGP.xlsx; 7.1 – 7.7 Confidential Appendix D Third-Party Contract Summary; 8.1 – 8.7 Confidential Appendix E Contracts and Change Orders.

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the

basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Check	Basis for Confidential Treatment	Where Confidential Information is Located on the Documents
<input type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data.</p> <p>(Protected under PUC § 8380; Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)</p>	
<input type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver’s license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual.</p> <p>(Protected under Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)</p>	
<input type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113 and/or General Order 66-D (“The subject information: (1) is not customarily in the public domain by providing a declaration in compliance with Section 3.2(c) stating that the subject information is not related to the location of a physical structure that is visible with the naked eye or is available publicly online or in print; and (2) the subject information either: could allow a bad actor to attack, compromise or incapacitate physically or electronically a facility providing critical utility service; or discusses vulnerabilities of a facility providing critical utility service”).</p> <p>(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)</p>	
<input checked="" type="checkbox"/>	<p>Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data.</p> <p>(Protected under Civ. Code §§3426 <i>et seq.</i>; Govt. Code §§ 6254, <i>et seq.</i>, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)</p>	See list in matrix below.

PACIFIC GAS AND ELECTRIC COMPANY (U 39 M)

**Application 17-01-013 and R. 13-11-005
ATTACHMENT TO DECLARATION
February 10, 2023**

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
4.0 Confidential Appendix A Final IE Report LGP.pdf	4.0 Confidential Appendix A Final IE Report LGP.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
5.0 Confidential Appendix B Solicitation Process Overview;	5.0 Confidential Appendix B Solicitation Process Overview;	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
6.1 PGE Solicitation Selection Spreadsheet LGP.xlsx;	6.1 PGE Solicitation Selection Spreadsheet LGP.xlsx	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
7.1 Confidential Appendix D Third-Party Contract Summary for CCAG.pdf	7.1 Confidential Appendix D Third-Party Contract Summary for CCAG.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E

7.2 Confidential Appendix D Third-Party Contract Summary for Redwood Coast.pdf	7.2 Confidential Appendix D Third-Party Contract Summary for Redwood Coast.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
7.3 Confidential Appendix D Third-Party Contract Summary for Marin.pdf	7.3 Confidential Appendix D Third-Party Contract Summary for Marin.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
7.4 Confidential Appendix D Third-Party Contract Summary for SJVCEO.pdf	7.4 Confidential Appendix D Third-Party Contract Summary for SJVCEO.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
7.5 Confidential Appendix D Third-Party Contract Summary for Sierra Business Council.pdf	7.5 Confidential Appendix D Third-Party Contract Summary for Sierra Business Council.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
7.6 Confidential Appendix D Third-Party Contract Summary for Energy Coalition.pdf	7.6 Confidential Appendix D Third-Party Contract Summary for Energy Coalition.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E

7.7 Confidential Appendix D Third-Party Contract Summary for Sonoma.pdf	7.7 Confidential Appendix D Third-Party Contract Summary for Sonoma.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
8.1 Confidential Appendix E Change Order CCAG.pdf	8.1 Confidential Appendix E Change Order CCAG.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
8.1 Confidential Appendix E Contract CCAG.pdf	8.1 Confidential Appendix E Contract CCAG.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
8.2 Confidential Appendix E Change Order Redwood Coast.pdf	8.2 Confidential Appendix E Change Order Redwood Coast.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
8.2 Confidential Appendix E Contract Redwood Coast.pdf	8.2 Confidential Appendix E Contract Redwood Coast.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
8.3 Confidential Appendix E Change Order Marin.pdf	8.3 Confidential Appendix E Change Order Marin.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E

8.3 Confidential Appendix E Contract Marin.pdf	8.3 Confidential Appendix E Contract Marin.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
8.4 Confidential Appendix E Change Order SJVCEO.pdf	8.4 Confidential Appendix E Change Order SJVCEO.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
8.4 Confidential Appendix E Contract SJVCEO.pdf	8.4 Confidential Appendix E Contract SJVCEO.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
8.5 Confidential Appendix E Change Order Sierra Business Council.pdf	8.5 Confidential Appendix E Change Order Sierra Business Council.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
8.5 Confidential Appendix E Contract Sierra Business Council.pdf	8.5 Confidential Appendix E Contract Sierra Business Council.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
8.6 Confidential Appendix E Change Order Energy Coalition.pdf	8.6 Confidential Appendix E Change Order Energy Coalition.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E

8.6 Confidential Appendix E Contract Energy Coalition.pdf	8.6 Confidential Appendix E Contract Energy Coalition.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
8.7 Confidential Appendix E Change Order Sonoma.pdf	8.7 Confidential Appendix E Change Order Sonoma.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E
8.7 Confidential Appendix E Contract Sonoma.pdf	8.7 Confidential Appendix E Contract Sonoma.pdf	Protected market sensitive/competitive data	Advice Letter 4713-G/6860-E

PACIFIC GAS AND ELECTRIC COMPANY

Approval of Contract Amendments for Local Government Partnerships Contracts for Third-Party Energy Efficiency Customer Programs

PUBLIC VERSION

February 10, 2023



Together, Building
a Better California

TABLE OF CONTENTS

ADVICE LETTER PART 1: PUBLIC SECTION	3
1. INTRODUCTION	3
<i>A. Purpose</i>	3
<i>B. Solicitation Overview and Original Contract</i>	14
2. CONFIDENTIALITY	18

ATTACHMENT A: Final IE Report (Public)

ATTACHMENT B: Program-Level Measurement & Verification Plan

ADVICE LETTER PART 1: PUBLIC SECTION

1. INTRODUCTION

A. Purpose

Pursuant to the California Public Utilities Commission (CPUC or the Commission) Decision (D.)18-05-041 – Decision Addressing Energy Efficiency Business Plans, and in accordance with the requirements and timeline described in D.18-01-004 – Decision Addressing Third Party Solicitation Process for Energy Efficiency (EE) Programs, Pacific Gas and Electric Company (PG&E) hereby submits this advice letter (AL) to seek Commission approval of contract amendments to the following seven Local Government Partnerships (LGP) contracts:

1. San Mateo County Energy Watch Subprogram between City/County Association of Governments and PG&E;
2. Central California Energy Watch Subprogram between San Joaquin Valley Clean Energy Organization and PG&E;
3. Marin Energy Watch Subprogram between County of Marin and PG&E;
4. Redwood Coast Energy Watch Subprogram between Redwood Coast Energy Authority and PG&E;
5. Sierra Nevada Energy Watch Subprogram between Sierra Business Council and PG&E;
6. Sonoma Public Energy Subprogram between County of Sonoma General Services Department and PG&E;
7. Central Coast Leaders in Energy Action Partnership Subprogram between The Energy Coalition and PG&E.

The local government partnerships (LGPs) target different regions within PG&E's service territory with a primary focus on identifying EE project opportunities for other EE resource acquisition programs within PG&E's program portfolio. The LGPs each provide their own set of program services that enable other resource acquisition programs to capture greater levels of energy efficiency primarily among local governments and other targeted customer groups. The program offerings vary but in aggregate the LGPs will:

- Increase opportunities for local government customers to save energy in local public buildings, especially those serving Hard-to-Reach (HTR) customers and/or customers

located in disadvantaged communities (DAC).

- Increase the opportunities to save energy for non-residential HTR customers and/or customers located in DACs through working with local governments.
- Improve local government staff capacity to conduct activities that will lead to greater EE impact for the local government and/or its communities.

Eight initial contracts for this subprogram were solicited in 2019. One of these eight was not extended and this advice letter is focused on the seven contracts that have been extended. These seven contracts resulted from PG&E's LGP solicitation and contributed to PG&E's 25 percent compliance target. The contract amendments that are the subject of this advice letter serve to extend each program (granting additional budget), refresh labor rates to present day, and update the Key Performance Indicators used to measure program performance. Due to the increased contract budget and duration, these contract amendments require CPUC approval via Tier 2 advice letter approval.

I. Amendment Overview

This advice letter covers amendments to seven contracts, as shown in Table A. The content of the contract amendments are similar across the seven contracts and include changes to increase the budget and duration of the contracts, changes to update the labor rates, and changes to update the Key Performance Indicators. The scopes of work remain unchanged. All seven amended contracts were signed by PG&E and the implementer in December 2022 or January 2023.

The increased funding and the extended duration are necessary for the program to continue serving local governments and the customers found within HTR areas and DACs within their counties. PG&E's Local Government Partners support the economic, environmental, and societal health of their communities. The organizations that run these partnerships are well established within their communities, and, as such, can serve as valuable liaisons between those communities and PG&E. The LGPs can help customers overcome barriers to EE and integrated-demand-side-management adoption and increase participation in EE programs. In addition, LGPs can support PG&E's underserved customers in these jurisdictions by targeting HTR customers, as well as DACs and rural communities. Over the past 10 years, PG&E has supported LGPs within PG&E's service territory, currently including 30 counties.

The contract budgets shown in Table A reflect the new total contract value including the budget increase from these contract amendments. The contract durations shown in Table A reflect the new total contract duration including the extensions per these contract amendments. Upon CPUC approval, these amended contracts will replace the existing (original) contracts.

Table A: Total Contract Budget and Duration Resulting From Contract Amendments for the LGP Program			
		New Total Contract Budget (\$M)	New Total Contract Duration (months)
1.1	City/County Association of Governments of San Mateo County - San Mateo County Energy Watch	\$2,785,000	66; 07/01/2020 - 12/31/2025
1.2	Redwood – Redwood Coast Energy Authority	\$1,765,727	66; 07/01/2020 - 12/31/2025
1.3	Marin County – Marin Energy Watch	\$965,800	66; 07/01/2020 - 12/31/2025
1.4	SJVCEO – Central California Energy Watch	\$4,139,027	66; 07/01/2020 - 12/31/2025
1.5	Sierra Nevada Energy Watch	\$3,326,957.58	66; 07/01/2020 - 12/31/2025
1.6	Central Coast Leaders in Energy Action Partnership	\$2,084,000	66; 07/01/2020 - 12/31/2025
1.7	Sonoma County – Sonoma Public Energy	\$2,095,000	66; 07/01/2020 - 12/31/2025

The following figure depicts the events and dates associated with the contract amendments.

Figure 1 – Contract Amendment Dates		
Local Government Partnership	Execute Contract Amendment Successful agreement changes with counterparties reflected in executed Contract Amendment	Advice Letter PG&E filed Advice Letters
San Mateo	January 23, 2023	February 10, 2023
Redwood Coast	December 29, 2022	
Marin County	January 23, 2023	
SJVCEO	December 21, 2022	
Sierra Nevada	January 3, 2023	
CC – LEAP	December 20, 2022	
Sonoma County	January 12, 2023	

PG&E deems this approach, to extend existing LGP contracts, to be in the best interest of the ratepayers due to the following:

- Current LGP implementers are already ramped up, with existing relationships that support the economic, environmental, and societal health of their communities. The organizations that run these partnerships are well established within their communities, and, as such, serve as valuable liaisons between those communities and PG&E.
- The LGPs help customers overcome barriers to EE and decarbonization/electrification adoption and increase participation in EE programs, especially in HTR, DAC and Rural communities.
- Current LGP implementers are demonstrating success in driving EE projects to resource acquisition programs, delivering a pipeline of 8,000,000 kwh of energy efficiency & decarbonization projects.

The following Table B provides a summary of the LGP contracts and includes the budget increase and extended duration per the contract amendments that are the subject of this AL. Thus Table B reflects the total contract budget and duration. PG&E has included the contract sensitive information as part of the Confidential Section D.

1	Solicitation name	LOCAL GOVERNMENT PARTNERSHIP THIRD-PARTY ENERGY EFFICIENCY CUSTOMER PROGRAM						
2	Type of program: local, regional or statewide	Local Government Partnership (San Mateo)	Local Government Partnership (Redwood)	Local Government Partnership (Marin)	Local Government Partnership (SJVCEO)	Local Government Partnership (Sierra)	Local Government Partnership (CC-LEAP)	Local Government Partnership (Sonoma)
3	Delivery Type and Targeting							
	a. Direct Install/Downstream Customer Targeting (Yes or No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	b. Customer Targeting brief description, if applicable	Customer Targeting and valued project identification for referral to 3P and other implementors	Customer Targeting and valued project identification for referral to 3P and other implementors	Customer Targeting and valued project identification for referral to 3P and other implementors	Customer Targeting and valued project identification for referral to 3P and other implementors	Customer Targeting and valued project identification for referral to 3P and other implementors	Customer Targeting and valued project identification for referral to 3P and other implementors	Customer Targeting and valued project identification for referral to 3P and other implementors
	c. Midstream/Upstream Market Actors receiving incentives, if applicable	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4	Market /Sector(s)	Public and Commercial	Residential, Commercial, Public, Industrial, Agricultural	Public, Commercial	Public	Public, HTR/DAC SMB	Public, Commercial	Public
5	Customer Segment(s)	Municipal, Special Districts, K-12 Public School Districts, Small Hard-to-Reach Businesses	Public Agencies and Hard-to-Reach	Cities/towns/count y, school districts, special districts and HTR SMB	Cities, Counties, Special Districts and k-12 school districts	Local Governments, Public Agencies, K-12 School Districts, HTR/DAC customers, Unserved Small-to-Medium sized businesses	City governments & townships, Tribes, County governments, K-12 school districts, Water/wastewater agencies/districts, Other public	Cities, Counties, Special Districts and k-12 school districts

							agencies (not served by Statewide Programs)	
6	Third-Party Implementer/Subcontractor name	City/County Association of Governments of San Mateo County	Redwood	Marin	SJVCEO	SNEW	CC-LEAP	Sonoma
7	Name of program or service	San Mateo County Energy Watch	Redwood Coast Energy Authority	Marin Energy Watch	Central California Energy Watch	Sierra Nevada Energy Watch	Central Coast Leaders In Energy Action Partnership	Sonoma Public Energy
8	Brief description of program or service (2-3 sentences)	San Mateo County Energy Watch plans to continue to provide services to the following customer segments: local governments, special districts, K-12 public school districts, and hard-to-reach small businesses. Our overall strategy for the SMC Energy Watch is to work in two ways: 1. Drive referrals for immediate projects 2. Build a pipeline for future electrification projects.	RCEW will assist local governments and public agencies with becoming energy efficiency leaders. RCEW will support cost-effective delivery of resource acquisition program services to the Public and Hard-To-Reach sectors of Humboldt County. RCEW will use an integrated energy management approach to services that presents customers with progressively stepped solutions encouraging deeper retrofits.	The team has developed programs to promote renewable energy, address climate change, encourage green building, recognize green businesses and implement energy efficiency projects in County schools, special districts and cities and towns.	CCEW aims to achieve four goals: GHG emission reduction, lower agency energy costs, support local control, and have our local governments to ZNE by 2033 through various program activities and objectives.	The SNEW program expands energy efficiency and renewable energy use in the Sierra, empowering local action, eliminating barriers to a clean energy future, establishing climate resiliency, and saving communities money. The SNEW team works closely with local governments, school districts, public agencies, and small businesses to	CC-LEAP's mission is to empower public agencies to adopt cost-effective sustainable energy solutions in Central Coast communities. CC-LEAP provides services to public agencies throughout the areas served by PG&E in San Luis Obispo, Santa Barbara, and San Benito Counties.	County of Sonoma Energy and Sustainability Division will offer the Sonoma Energy Watch program. The primary program offering will come in the form of the "Energy Efficiency Roadmap" and its accompanying services. County of Sonoma Employees, qualified "EE Roadmap Specialists", and PG&E 3P Resource Acquisition Program Implementers will assist customers in completing a building assessment resulting in the EE Roadmap report

						provide energy use analysis and audits, helping link to resources, providing project management support, and finding funding and financing solutions. They also conduct greenhouse gas (GHG) inventories, develop and implement emissions reduction plans, and execute energy projects that make communities more resilient, efficient, and vibrant.		which will outline and help customers to prioritize and plan upgrades and improvements to their building's equipment over years to come. Referrals to PG&E 3P Resource Acquisition Programs will be a main focus of Sonoma Public Energy and all leads referred will be tracked and reported.
9	Total kWh Energy Savings (First year, net)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
10	Total MW Energy Savings (First year, net)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
11	Total therms Energy Savings (First year, net)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
12	Hard to Reach (HTR) Customers. Provide forecasted total number of HTR customer accounts.	N/A	N/A	N/A	N/A	N/A	N/A	N/A

13	Disadvantaged Community (DAC) Customers. Provide forecasted total number of DAC customer accounts.	N/A	N/A	N/A	N/A	N/A	N/A	N/A
14	Forecasted Number of Customers Served by Program Year	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
15	Area(s) Served (including service territory, climate zones, cities, and/or counties, as applicable)	San Mateo County	Humboldt County	Marin County	Counties: Kings, Tulare, Stanislaus, San Joaquin, Merced, Fresno, Kern, Monterey, Madera, San Benito (Muni)	Counties: Lassen, Plumas, Sierra, Nevada, Placer, El Dorado, Amador, Alpine, Calaveras, Tuolumne, Mariposa, Butte, Sutter, Yuba	Counties: Santa Barbara, San Luis Obispo, San Benito (Comm)	Sonoma County
16	Program TRC ratio (CET output)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
17	Program PAC ratio (CET output)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
18	Program \$/kWh (TRC levelized cost, CET output)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
19	Program \$/kWh (PAC levelized cost, CET output)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
20	Program \$/MW (TRC levelized cost, CET output)	N/A	N/A	N/A	N/A	N/A	N/A	N/A

21	Program \$/MW (PAC levelized cost, CET output)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
22	Program \$/therm (TRC levelized cost, CET output)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
23	Program \$/kWh (PAC levelized cost, CET output)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
24	Budget: Forecast budget by program year (PY) for each year contract in effect	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
25	Budget: Forecast expenditures by program year (PY) for each year contract in effect	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
26	Budget: Total Program Budget, 2020-2025 (include explanation for difference, if any, from total contract budget provided in Table A)	\$2,785,000	\$1,765,727	\$965,800	\$4,139,027	\$3,326,957.58	\$2,084,000	\$2,095,000

27	Budget: If EE/DR component to the program, provide dollar amount and percent of total budget dedicated to EE/DR component	N/A	N/A	N/A	N/A	N/A	N/A	N/A
28	Measure(s)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
29	Savings Determination Type (i.e. custom, deemed, Net Metered Energy Consumption, or Randomized Control Trial)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
30	Savings Calculation Method(s) (Meter-Based, Deemed, Calculated, Multiple and/or Other)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
31	Contract start date and end date	07/01/2020 - 12/31/2025	07/01/2020 - 12/31/2025	07/01/2020 - 12/31/2025	07/01/2020 - 12/31/2025	07/01/2020 - 12/31/2025	07/01/2020 - 12/31/2025	07/01/2020 - 12/31/2025
32	Program start date and end date. If program dates aren't defined by the period the program is open for customer participation, explain, and also include customer participation period.	07/01/2020 - 12/31/2025	07/01/2020 - 12/31/2025	07/01/2020 - 12/31/2025	07/01/2020 - 12/31/2025	07/01/2020 - 12/31/2025	07/01/2020 - 12/31/2025	07/01/2020 - 12/31/2025
33	NAICS codes eligible for the program	Any starting with the following two digits	Any starting with the following two digits	Any starting with the following two digits				

		Sector Codes: 11, 22, 23, 31-33, 42, 44-45, 48-49, 51, 52, 53, 54, 55, 56, 61, 62, 71, 72, 81, 92	Sector Codes: 11, 22, 23, 31-33, 42, 44-45, 48-49, 51, 52, 53, 54, 55, 56, 61, 62, 71, 72, 81, 92	digits Sector Codes: 11, 22, 23, 31-33, 42, 44-45, 48-49, 51, 52, 53, 54, 55, 56, 61, 62, 71, 72, 81, 92	digits Sector Codes: 11, 22, 23, 31-33, 42, 44-45, 48-49, 51, 52, 53, 54, 55, 56, 61, 62, 71, 72, 81, 92	digits Sector Codes: 11, 22, 23, 31-33, 42, 44-45, 48-49, 51, 52, 53, 54, 55, 56, 61, 62, 71, 72, 81, 92	digits Sector Codes: 11, 22, 23, 31-33, 42, 44-45, 48-49, 51, 52, 53, 54, 55, 56, 61, 62, 71, 72, 81, 92	Sector Codes: 11, 22, 23, 31-33, 42, 44-45, 48-49, 51, 52, 53, 54, 55, 56, 61, 62, 71, 72, 81, 92
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B. Solicitation Overview and Original Contract

I. Solicitation Strategy & Design

PG&E conducted a two-stage solicitation process which included a Request for Abstracts (RFA) followed by a Request for Proposals (RFP) stage. The solicitation asked bidders to propose, design, and deliver an innovative, non-resource-based program that met one or more of the IOU's desired program outcomes and needs. The three desired outcomes included: LGPs supporting energy saving projects in the Public Sector, LGPs supporting energy saving projects for non-residential HTR and DAC Customers, and LGPs building capacity to help save energy. Bidders were allowed to propose other program activities not included in PG&E's list if the proposed program would support at least one of the desired outcomes.

II. RFA Overview

The purpose of the RFA was to conduct a comprehensive evaluation of each abstract and identify bidders to advance to the RFP stage. The rest of this section provides a high-level description of PG&E's LGP RFA process. The RFA solicitation timeline can be found in *Figure 6 – Timeline of Solicitation Events*.

RFA Scope: Bidders were invited to submit any LGP Program approach that directly helped to deliver energy savings for the achievement of the IOU's EE goals. The RFA scope focused primarily on increasing energy efficiency in public buildings, supporting EE projects for HTR and DAC customers, and building capacity within public sector staff.

RFA Evaluation Criteria: The evaluation focused on the abstract's alignment with the desired outcomes stated in the RFA, the Bidder's qualifications and experience, and program innovation. *Figure 2* lists the various criteria used to evaluate each abstract submission.

Figure 2 – LGP RFA Scoring Criteria
Program Concept
Company Experience & Qualifications
Innovation

RFA Launch: PG&E issued the RFA solicitation on May 23, 2019. PG&E raised awareness of the RFA by posting the Contract Opportunity Announcement (COA) on PGE.com and worked with Statewide EE Collaborative (SEEC), an industry group, to provide an announcement of the solicitation to its members. PG&E also notified its existing local government partners of the upcoming solicitation. Bidders were required to register in Power Advocate to get access to the documents and to submit abstracts.

RFA Evaluation Team Training: The PG&E RFA evaluation team consisted of four PG&E staff with deep experience of local government partnerships. Prior to receiving proposals for evaluation, PG&E conducted a training session with the evaluation team to provide an overview of the evaluation process, orientation to the scorecard, and guidance on how to apply the scoring criteria consistently and fairly.

RFA Evaluation: Each abstract was reviewed against the evaluation criteria listed in *Figure 2 – RFA Scoring Criteria*. The 4 PG&E evaluation team members individually assigned a preliminary score for each sub-criterion.

RFA Calibration: PG&E conducted calibration discussions across all scoring criteria and finalized proposal scores. Preliminary scores from the PG&E evaluation team members were collected and compared. Calibration discussions were an opportunity to discuss points of disagreement observed in scoring and evaluation team members could adjust preliminary scores based on the insights shared by others.

RFA Final Scores: After the calibration discussions concluded, any scoring adjustments from the PG&E evaluation team members were received and recorded. The calibration discussions did not change the shortlist.

Advancing to RFP: PG&E’s approach was straightforward with only the top scoring bidders advancing to RFP. A summary of the number of bids moving through the solicitation process is shown in *Figure 3 – PG&E LGP Solicitation Bid Numbers*. PG&E did not dismiss any proposals from the RFA for non-conformance.

FIGURE 3 – PG&E LGP Solicitation Bid Numbers				
	Received	Non-Conforming	Evaluated	Advanced
RFA	20	0	20	14

III. RFP Overview

The purpose of the RFP was to conduct a comprehensive evaluation of each proposal and identify bidders to advance to contract negotiations. The rest of this section provides a high-level description of PG&E’s LGP RFP process. An RFP solicitation timeline can be found in *Figure 6 – Solicitation Process Events*.

RFP Scope: Bidders were invited to submit a LGP Program approach that aligned with their initial abstract and that directly helps deliver energy savings for the achievement of the PG&E’s EE goals.

RFP Evaluation Criteria: Bidders were requested to submit a program proposal that provided a comprehensive overview of the program including a detailed description of the

Program Concept, Team Experience and Qualifications, and Supply Chain Responsibility. *Figure 4* lists the various criteria used to evaluate each proposal submission.

Figure 4 – LGP RFP Scoring Criteria
Program Concept
Team Experience and Qualifications
Supply Chain Responsibility

RFP Launch: PG&E issued the LGP RFP on November 4, 2019. All Bidders advancing to the RFP stage were invited to participate. Bidders accessed all documents via PowerAdvocate.

RFP Evaluation Team Training: The PG&E RFP evaluation team consisted of 5 PG&E staff. Prior to receiving proposals for evaluation, PG&E conducted a training session with the evaluation team to provide an overview of the evaluation process, orientation to the scorecard, and guidance on how to apply the scoring criteria consistently and fairly.

RFP Evaluation: Each proposal was reviewed against the evaluation criteria listed in *Figure 4 – RFP Scoring Criteria*. The 5 PG&E evaluation team members individually assigned a preliminary score for each sub-criterion.

RFP Calibration: PG&E conducted calibration discussions across all scoring criteria and finalized proposal scores. Preliminary scores from the PG&E evaluation team members were collected and compared. Calibration discussions were an opportunity to discuss points of disagreement observed in scoring and evaluation team members could adjust preliminary scores based on the insights shared by others.

RFP Final Scores: After the calibration discussions concluded, any scoring adjustments from the PG&E evaluation team members were captured in the final scorecard. The calibration discussions ultimately did not change the shortlist.

FIGURE 5 – PG&E LGP Solicitation Bid Numbers				
	Received	Non-Conforming	Evaluated	Advanced
RFA	20	0	20	14
RFP	14	0	14	8

Advancing to Negotiations: PG&E’s approach was straightforward with only the top scoring bidders advancing to negotiations. A summary of the number of bids moving through the solicitation process is shown in *Figure 5 – PG&E LGP Solicitation Bid Numbers*. PG&E did not dismiss bids from either the RFA or RFP for non-conformance.

IV. Contract Negotiation Overview

PG&E's General Terms and Conditions served as the starting point for negotiation of an executable agreement. In each of the eight contract negotiations, PG&E and the bidder engaged in detailed discussions of program scope and budget as well as proposed changes to contract terms, if any.

The final contract award occurred when both parties were able to reach mutually agreeable terms and that agreement also provided the best overall available benefits to California customers while effectively managing program delivery risk. PG&E holistically considered the proposed program design, historical Bidder team experience, and overall risk mitigation approaches when making final contract award determinations.

V. Solicitation Timeline

The following figure depicts the timeline of solicitation events for PG&E's LGP Program.

Figure 6 – Timeline of Solicitation Events	
Event	Date
RFA Issued RFA documents were available to bidders in PowerAdvocate for download.	May 23, 2019
Abstract Submission Deadline Bidders' Abstract submission due date. Registration in PowerAdvocate was required to submit an Abstract.	June 21, 2019
RFA Evaluation and Scoring Scoring and Calibration.	June 24 – July 20, 2019
RFP Issued RFP documents were available to bidders in PowerAdvocate for download.	November 4, 2019
Proposal Submission Deadline Bidders Proposals submission due date. Registration in PowerAdvocate was required to submit a Proposal.	December 20, 2019
RFP Evaluation and Scoring Scoring and Calibration	January 2 – 22, 2020
Contract Negotiations	Feb – April 2020
Executed Agreements Negotiations and successful agreement with counterparties reflected in executed Agreements	June 2020

VI. Original Contracts

Table C lists the original contract awards resulting from PG&E's LGP solicitation. The original contract budgets and durations are also reflected in Table C. The original solicitation was monitored by a PG&E Independent Evaluator, Don Arambula Consulting. The original Independent Evaluator Report associated with this solicitation is found within Appendix A. The report addresses the solicitation process and initial contract, however, does not address the subsequent contract amendments.

Table C: Original Contract Budgets and Duration Resulting from LGP Solicitation			
		Original Contract Budget	Original Contract Duration (months)
1.1	City/County Association of Governments of San Mateo County - San Mateo County Energy Watch	\$972,000	36
1.2	Redwood – Redwood Coast Energy Authority	\$765,727	36
1.3	Marin County – Marin Energy Watch	\$565,800	36
1.4	SJVCEO – Central California Energy Watch	\$1,965,027	36
1.5	Sierra Nevada Energy Watch	\$1,826,958	36
1.6	Central Coast Leaders in Energy Action Partnership	\$748,000	36
1.7	Sonoma County – Sonoma Public Energy	\$855,000	36
1.8	City and County of San Francisco	\$2,450,262	36

2. CONFIDENTIALITY

In support of this AL, PG&E provides the following confidential information: executed Third-Party Implementer Energy Efficiency Program contracts, information about the participants and offers submitted in response to PG&E's Local Government Partnerships solicitation including the evaluation and analysis of the value of such offers, information and program metrics, financial and performance statistics of the parties, and the confidential results of the solicitation.

A Declaration Seeking Confidential Treatment is submitted in support of this AL, as required by D. 08-04-023, to demonstrate the confidentiality of material and to invoke the Commission's protection of confidential utility data and information provided under D.06-06-066 (see, Appendix 1, ("IOU Matrix")) and Appendix C D. 08-04-023 or General Order 66-D.

Confidential Attachments:

Confidential Appendix A: Independent Evaluator Report

Confidential Appendix B: Solicitation Process Overview

Confidential Appendix C: LGP Selection Spreadsheet

Confidential Appendix D: Third-Party Contract Summary

- a) Table 1 Contract Summary
- b) Table 2 and 3

Confidential Appendix E: Third-Party Contracts

Public Attachment A

Energy Efficiency Third-Party Solicitation Advice Letter

Energy Efficiency Independent Evaluator's Final Report (Redacted)

February 10, 2023



FINAL INDEPENDENT EVALUATOR REPORT

Pacific Gas and Electric Company - Third Party Energy Efficiency Program Solicitations

Local Government Partnerships - Contracts

October 19, 2020

Prepared by:
INDEPENDENT EVALUATOR
Don Arambula



FINAL INDEPENDENT EVALUATOR REPORT

TABLE OF CONTENTS

- 1. Contract Summary 2**
- 2. Background 3**
- 3. Solicitation Overview 5**
 - 3.1 Overview 5
 - 3.2 Timing..... 7
 - 3.3 Key Observations..... 7
- 4. Solicitation Outreach and Bidder Response..... 9**
 - 4.1 Bidder Response to Solicitation 9
 - 4.2 Bidder’s Conference and Q&A 10
 - 4.3 Solicitation Design Assessment 11
- 5. RFA and RFP Design and Materials Assessment 11**
- 6. Bid Evaluation Methodology Assessment13**
 - 6.1 Bid Screening Process 13
 - 6.2 Scoring Rubric Design 15
 - 6.3 Evaluation Team Profile 16
 - 6.4 Response to PRG and IE Advice..... 16
- 7. Final Bid Selection Assessment.....16**
 - 7.1 Conformance with Established Evaluation Processes 16
 - 7.2 Management of Deficient Bids..... 17
 - 7.3 Shortlist and Final Selections 17
 - 7.4 Affiliate Bids and Conflict of Interest..... 20
- 8. Assessment of Selected Bids.....21**
 - 8.1 Bid Selection Respond to Portfolio Needs..... 21
 - 8.2 Bid Selections Provide the Best Overall Value to Ratepayers..... 22
- 9. Reasonableness of Contracting Process28**
 - 9.1 Collaboration on Final Program Design and Scope..... 28
 - 9.2 Fairness of Negotiations 29
 - 9.3 Changes to Contract Terms & Conditions 30
 - 9.4 Conformance with CPUC Policies and Objectives..... 31
 - 9.5 Uniformity of Contract Changes..... 33

1. Contract Summary

The Final Independent Evaluators Report (Report) provides a final assessment of Pacific Gas and Electric Company’s (PG&E) third-party energy efficiency (EE) program solicitation process and executed contract (Contract) between PG&E and the program implementer. The Report is provided by Don Arambula Consulting (DAC), the Independent Evaluator assigned to PG&E’s Local Government Partnership solicitation. The Report addresses PG&E’s contracts (Contracts) with eight local government implementers (LGIs).

LOCAL GOVERNMENT PARTNERSHIP SUMMARY

The local government implementers (LGIs) target various regions within PG&E’s service territory with a primary focus on identifying various EE project opportunities for other energy efficiency resource programs within the IOU’s program portfolio. The eight LGI’s have Contracts with a combined total value of \$10,149,000 over a three-year term, as listed below:

LGI	Contract Execution Date	Final Budget (3 yrs.)
City and County Association of Governments	6/9/2020	\$972,000
City and County of San Francisco	6/19/2020	2,450,000
County of Marin - Community Development Agency	6/16/2020	566,000
Energy Coalition	6/9/2020	748,000
Redwood Coast Energy Authority	6/9/2020	766,000
Sierra Business Council	6/10/2020	1,827,000
San Joaquin Valley Clean Energy Organization	6/8/2020	1,965,000
Sonoma County	6/19/2020	855,000
Total		\$10,149,000

The IE supports the Contracts agreed to between PG&E and the LGIs. The Local Government Partnerships are categorized as a non-resource program. The LGIs will provide their own unique set of program services that will enable other PG&E resource programs to capture greater levels of energy efficiency primarily among local governments and other targeted customer groups. The LGIs EE program offerings will vary but in aggregate the LGPs will:

- Increase the opportunities for local government customers to save energy in local public buildings, especially for those local governments that serve Hard-to-Reach (HTR) customers and/or customers located in disadvantaged communities (DAC).
- Increase the opportunities to save energy for any HTR customers and/or customers located in DAC through working with local governments.
- Improve local government staff capacity to conduct activities that will lead to energy efficiency for the local government and/or its communities.

The Report addresses each aspect of the solicitation from the initial RFA development through contract execution. Table 2 lists key recommendations and observations made throughout the Report. The recommendations include potential process improvements to future solicitations as well as recommendations that are intended to enhance the implementation of the LGI Contracts.

2. Background

The assigned Independent Evaluator (IE) is required to submit an individual IE assessment report (IE Report) on each executed energy efficiency third-party contract and the corresponding program solicitation process. An advice letter filing is required if the proposed contract value is \$5 million or greater and/or has a contract term longer than three years. In such cases, the IE Report is filed as part of the investor-owned utility's (IOU) Tier 2 advice letter seeking California Public Utilities Commission (CPUC) approval of the energy efficiency third-party contract. Regardless, the IE is always required to provide a report to the IOU's Energy Efficiency Procurement Review Group (PRG).¹

In August 2016, the CPUC adopted Decision 16-08-019, which defined a “third-party program” as a program proposed, designed, implemented, and delivered by non-utility personnel under contract to a utility program administrator. In January 2018, the CPUC adopted Decision 18-01-004 directing the four California IOUs—PG&E, Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas)—to ensure that their EE portfolios contain a minimum percentage of third-party designed and implemented programs by predetermined dates over a three-year period. Further directions were included in Decision (D.)18-05-041, which states:

“The third-party requirements of Decision (D.)16-08-019 and D.18-01-004 are required to be applied to the business plans of the investor-owned utilities approved in this decision. All utility program administrators shall have at least 25 percent of their 2020 program year forecast budgets under contract for programs designed and implemented by third parties by no later than December 19, 2019.”²

In a letter dated November 5, 2019, PG&E requested an extension to June 30, 2020 to meet the 25 percent requirement to allow for sufficient time for a detailed and thoughtful contract negotiation stage for its Local Multi-Sector RFP. In November 2019, the CPUC granted PG&E's request for extension of time to meet the 25 percent threshold by June 30, 2020.

The CPUC further stated that, consistent with D.18-05-041, the IOUs must meet at least 40 percent of their energy efficiency portfolios under contract for programs designed and implemented by third parties by December 31, 2020. No further extensions of time will be granted to the IOUs for meeting the third-party percentage requirements specified in Ordering Paragraph 4 of D.18-05-041.

TWO STAGE SOLICITATION APPROACH

The IOUs are required by the CPUC to conduct a two-stage solicitation approach for soliciting third party program design and implementation services as part of the energy efficiency portfolio. All IOUs are required to conduct a Request for Abstract (RFA) solicitation, followed by a full Request for Proposal (RFP) stage.³

The CPUC also requires each IOU to assemble a PRG. The IOU's PRG, a CPUC-endorsed entity, is composed of non-financially interested parties such as advocacy groups, utility-related labor

¹ Id.

² Id, OP 4, pp. 182-183.

³ Id, p. 2.

unions, and other non-commercial, energy-related special interest groups. The PRG is charged with overseeing the IOU's EE solicitation process (both local and statewide), reviewing procedural fairness and transparency. This oversight includes examining overall procurement prudence and providing feedback during all solicitation stages. Each IOU briefs its PRG on a periodic basis throughout the process on topics including the RFA and RFP language development, abstract and proposal evaluation, and contract negotiations.

Each IOU is required to select and utilize a pool of EE IEs to serve as consultants to the PRG.⁴ The IEs are directed to observe and report on the IOU's entire solicitation process, preparation, evaluation, selection, and contracting process. The IEs review and monitor the IOU solicitation process, valuation methodologies, selection processes, and contracting to confirm that an unbiased, fair, and transparent competitive process is conducted that is devoid of market collusion or manipulation. The IEs are privy to viewing all submissions. The IEs are invited to participate in all the IOU's solicitation through selection-related discussions and are bound by confidentiality obligations.

TIMELY SOLICITATIONS

On March 11, 2020, the CPUC's Energy Division (ED) provided additional guidance to the IOUs, in response to specific challenges being experienced in the market, as raised through the semiannual CPUC-hosted public workshops to identify process improvements directed at the following issues:

DELAYS IN SCHEDULES GUIDANCE

- Allocate up to 12 weeks from RFA release to notification of bidders of invitation to respond to RFP.
- Allocate up to 15 weeks from RFP release to notification of bidders' invitation to contract negotiation.
- Execute contract 12 weeks after invitation to contract negotiation unless the IOU is conducting multiple negotiations within the same solicitation, the program is complex, or the contract is addressing challenging contract elements.
- Update the solicitation schedules in their next quarterly update.

RFA GUIDANCE

- Adhere to the intent of the RFA stage explained in Decision 18-01-004.
- Refrain from requesting excessive detail in the RFA stage.

BIDDER COMMUNICATION

- Keep bidders notified of the status of the solicitation throughout the entire process.
- Provide better feedback to bidders by delivering on their commitments made in response to stakeholder requests.
- Provide non-advancing bidders notification if their abstracts/proposals didn't advance due to incomplete or non-conforming, a violation, or an unmitigated conflict of interest.

After the June 30 and September 30, 2020 deadlines are met, ED encourages the IOUs to make feedback available to bidders that they did not advance to the next stage of the solicitations.

⁴ Id, OP 5, p. 62.

3. Solicitation Overview

3.1 Overview

In support of the Local Government Partnership program solicitation, PG&E conducted a two-stage solicitation process which included a Request for Abstracts (RFA) followed by a Request for Proposals (RFP) stage. PG&E concluded the RFP stage with its final selections before entering into its contract negotiations with the selected bidders.

In response to the RFA, PG&E received 20 abstracts. Upon evaluation of the abstracts received, PG&E invited 14 bidders to the RFP stage and received 14 proposals. After evaluating all 14 proposals, PG&E ultimately selected 8 proposals.

PG&E began contract negotiations with all 8 winning bidders. Contract negotiations were very collaborative and focused on improving the Program’s offerings, reducing implementation costs, and, in some instances, redefining the regions which would be served by the LGI.

IE MONITORING CONTRACT NEGOTIATIONS

The IE actively monitored the contract negotiation meetings. Throughout negotiations, the IE had regularly scheduled meetings with PG&E’s project lead outside of the bidder meetings about how the IOU planned to address emerging issues such as changes to program scope, targeted customer groups, program offerings, and targeted geographical regions.

SOLICITATION SCOPE

The Local Government Partnership solicitation welcomed qualified bidders to propose, design, and deliver an innovative, non-resource-based program(s) that met one or more of the IOU’s desired program outcomes and needs, as presented below. Bidders were allowed to identify other needs not included PG&E’s scope as long as the proposed program could support at least one of the listed desired outcomes.

Desired Outcomes	Program Needs
LGP’s Supporting Energy Saving Projects in the Public Sector	Facilitating Projects with Deeper Savings, More Comprehensive EE – In coordination with the PG&E resource program portfolio, facilitate energy efficiency and/or EE integrated/ demand response projects, especially projects with deeper, more comprehensive EE opportunities in public buildings, and support implementation of Energy Management Processes/Plans and CPUC workforce standards (D.18-10-004). ⁵ The EE projects should support PG&E’s need to implement a cost-effective EE portfolio.
	Increasing Awareness of EE Opportunities in Public Sector Buildings – The objective is for all local public buildings within a jurisdiction to have the ability to be compared with each other to improve EE awareness. The Department of Energy’s Public Sector

⁵ OP 1 and 2.

Table 3.1: PG&E’s LGP Desired Program Outcomes

Desired Outcomes	Program Needs
	Benchmarking Plan, is an example of how this can be done: https://www.energy.gov/sites/prod/files/2017/09/f36/tap_designing_a_benchmarking_plan.pdf .
LGP’s Supporting Energy Saving Projects for HTR and DAC Customers	Facilitating Projects with Deeper Savings, More Comprehensive EE - In coordination with PG&E’s resource program portfolio and partnerships with local governments, facilitate energy efficiency and/or integrated EE/demand response projects, especially projects with deeper, more comprehensive EE opportunities, for HTR or DAC customers. The EE projects should support PG&E’s need to implement a cost-effective EE portfolio.
LGP’s Supporting Building Capacity to Help Save Energy	Improving EE Awareness of Public Sector Staff - Support EE training directed at public sector staff by leveraging and building upon PG&E’s existing Workforce, Education and Training opportunities. Examples of potential trainings to leverage include both technical training (Building Operator Certification, Title 24 standards, or advanced lighting controls) as well as educational trainings (e.g., energy-focused lecture series)
	Advancing EE Community-wide - Community-wide Energy Action Plans (EAP) would include a long-term energy efficiency vision and plan (in kWh savings or % reduction).
	Supporting GHG Inventories - Completing a GHG inventory which could include specifying the inventory type (e.g., municipal, K-12, community-wide, etc.) and specifically what it will cover (e.g., will it cover streetlights and traffic signals, water delivery facilities, etc.).
	Advancing EE in Public Sector Policies - This could include policies that set the specific EE requirements when a public jurisdiction procures energy-using equipment.
Creating and Adopting Standards for Municipal Facilities - This could include policies to demonstrate energy leadership within a community by ensuring that municipal buildings are energy efficient. Examples are LEED and ENERGY STAR ratings.	

OBJECTIVES

PG&E issued a two-stage solicitation to invite third-party program proposals to deliver non-resource customer programs. The solicitation clearly called for non-resource EE programs that do not directly procure energy efficiency savings. Instead, bidders were invited to submit any LGP Program approach that directly helps to deliver short-term and long-term energy savings for the achievement of the IOU’s EE goals and to support PG&E’s EE Business Plan objectives. For the Public sector, PG&E’s overall vision is to empower customers with the expertise and tools they need to efficiently manage their energy use and institutionalize energy efficiency as a normal practice by engaging local leadership.⁶

⁶ Pacific Gas and Electric Third Party Solicitation Process Proposal, dated August 4, 2017, Table 6, p. 15.

3.2 Timing

The LGP solicitation was an ad hoc solicitation that was not originally presented by PG&E’s solicitation plans. The RFA was released in May 2019, and the RFP was released on November 4, 2019. Contract negotiations and contract execution began in Quarter 1 of 2020. The timing of these major milestones is consistent with the current IOU Third-Party Dynamic Schedule on the California Energy Efficiency Coordinating Committee (CAEECC) website. Unless otherwise noted, all milestone dates were met with the exception of the contract negotiation stage, which was originally scheduled to conclude in April 2020, but was completed at the end of June 2020.

Table 3.2: Key Milestones	
Milestones	Completion Date
RFA Stage	
RFA distributed to Bidders	May 23, 2019
Bidders Conference (webinar only)	June 5, 2019
Deadline to submit written questions to PG&E	June 7, 2019
PG&E response to bidder questions	June 13, 2019
Abstract submissions due in PowerAdvocate	June 21, 2019
RFA selection and notification to bidders advancing to RFP stage	July 31, 2019
RFP Stage	
RFP distributed to Bidders	November 4, 2019
Bidders Conference (optional, via webinar)	November 14, 2019
Deadline to submit written questions to PG&E	November 20, 2019
PG&E response to bidder questions	November 26, 2019
Proposal submissions due in PowerAdvocate	December 20, 2019
Selections & Contracting Stage	
PG&E selection and notification to respondents	February 3, 2020
Contract negotiations	February–April 2020

3.3 Key Observations

Key observations identified throughout the solicitation are shown in Table 2. The IE shared these key recommendations and others with the IOU and PRG throughout the reporting period, unless where noted. The IOU was provided an opportunity to review, consider, and accept or not accept these recommendations.

Table 3.3: Key Issues and Observations			
Topic	Observation	IE Recommendation(s)	Outcome (IOU Action/Response)
Bidder Eligibility	Initially, PG&E proposed to limit the eligibility of the solicitation to existing lead local partners.	Propose expanding the eligibility of the program solicitation to capture a wider pool of qualified bidders.	After discussions with the IE and the CPUC’s Energy Division, PG&E expanded participation to include existing LGP implementers, all PG&E local governments, and any entity with an existing relationship with a local government.

Table 3.3: Key Issues and Observations

Topic	Observation	IE Recommendation(s)	Outcome (IOU Action/Response)
Innovation	Initial RFA evaluation scorecard proposed a █ percent weight assigned to Innovation, although, innovation is a key reason for conducting open third-party program solicitations.	Increase the weighting of Innovation to █ percent.	After discussions with IE, the Innovation weighting was increased to █ percent consistent with the PRG's recommendation.
IDSM	Initially the RFA did not provide the bidder direction on the CPUC's IDSM policies nor encourage proposals that reduced IDSM lost opportunities.	IDSM needs to be included in the RFA and in scoring criteria.	In collaboration with the IE, the IOU incorporated relevant RFA language encouraging bidders to propose approaches that minimize missed opportunities by promoting all, or some combination of, demand-side resources (in addition to energy efficiency).
RFA Requirements	There is a significant effort by a bidder to respond to extensive RFA requirements. Also, too many RFA requirements tend to dilute the IOU's weighting among sub-criteria.	Setting forth reasonable abstract requirements allow the bidder to concisely present their program concept and the IOU to efficiently evaluate bids. Abstract requirements focused on only the most important program design elements should be the norm for all future solicitations.	PG&E, in collaboration with the IE, distilled the RFA requirements to essential items (e.g., program design and operations, experience, innovation/IDSM, expected outcomes).
Unique Terms & Conditions for Public Sector	In Decision 19-08-006, the CPUC directed the IOUs to include a specific set of standard and modifiable terms and conditions for local government implementers.	Future solicitations directed at the public sector should include the new CPUC local government standard and modifiable terms and conditions.	Incorporated into the LGP RFP.
Unallocated Budgets	The aggregate budget of all eight selected proposals resulted in approximately █ of unallocated program funding.	PG&E should assign these unallocated program funds to other 3 rd party public sector programs currently under negotiations.	Pending.

Table 3.3: Key Issues and Observations			
Topic	Observation	IE Recommendation(s)	Outcome (IOU Action/Response)
LGP and 3P Resource Program Coordination	Since PG&E has not yet authorized related third-party resource programs to begin work, the LGIs could not clearly link their LGP offering to these pending programs to capture potential program synergies and avoid program overlap.	As these new resource programs begin pre-program launch activities, PG&E should invite the LGIs to collaborate with the new resource program implementers to capture potential program synergies, avoid program overlap, and agree upon the finer points of program coordination (e.g., customer outreach, project hand-offs, etc.). Results of such collaboration can be recorded in the Implementation Plans and corresponding program manuals for both the resource programs and the LGPs.	Pending.
Minimum Third-Party Threshold Requirements	In the calculation of the minimum threshold requirement it is unclear whether the additional EE and DR integration budget ⁷ should be included.	The CPUC should provide greater clarity to the IOUs on the proper calculation to be applied to the third-party threshold requirement.	Pending.
Bidder Debriefing Sessions	In response to public feedback at the CPUC semiannual workshop on the IOUs' program solicitation, PG&E opted to hold one-on-one debriefing sessions with those bidders who were not selected.	PG&E should continue to hold debriefing sessions while appropriately setting bidder expectations on the level of information that can be shared.	PG&E continues to hold debriefing sessions.

4. Solicitation Outreach and Bidder Response

4.1 Bidder Response to Solicitation

PG&E's stated goal was to notify all potentially eligible bidders of the opportunity to participate in PG&E's LGP solicitation. Prior to the release of the solicitation, PG&E program staff notified

⁷ D.18-05-041, OP 10, p. 184.

existing local government partners (aka, PG&E All Partners) of the upcoming event including the expected timing and general scope. This gave PG&E an early indication of the level of interest from the potential bidder pool in the upcoming solicitation and consider their concerns. PG&E also worked with Statewide EE Collaborative (SEEC), an industry group, to provide an announcement of the solicitation to its members. On May 9, 2019, PG&E released a Contract Opportunity Announcement (COA) that the solicitation would be open on May 23, 2019.

Overall, the solicitation received strong interest from the targeted potential bidder pool. PG&E’s active communications to all existing Partners for many months leading up to the solicitation appeared to help generate bidder participation.

Table 4.1: Solicitation Response	
	No.
Abstracts Expected	16-20
Abstracts Received	20
Abstracts Disqualified	0
Proposals Expected	14
Proposals Received	14
Proposals Disqualified	0

4.2 Bidder’s Conference and Q&A

RFA

PG&E held an RFA Bidders’ Conference on June 5, 2019. Potential bidders had ample time during the conference to ask questions. Bidders were also provided an opportunity after the conference to provide written questions. These written questions were due to PG&E by June 7, 2019. PG&E received 73 questions covering an array of topics such as: eligibility, geographical scope, multiple abstracts, contracting, customer targeting, PG&E’s Business Plan, solicitation timelines, statement of work, and budget. The IE was provided an opportunity to review PG&E’s draft response to each question prior to release to bidders. The IE recommended minor adjustments to a few draft responses. PG&E accepted the IE’s recommended changes. PG&E provided responses to all bidder questions by June 12, 2019 which was within the acceptable parameters recommended by the PRG. The responses provided to the bidders were complete and accurate.

RFP

PG&E held an RFP Bidders’ Conference on November 14, 2019. Invited bidders had ample time during the conference to ask questions. Bidders were also provided an opportunity after the conference to provide written questions. PG&E received 108 questions covering an array of topics such as: role of local governments, budgets, subcontractors, overlap with other programs, fuel substitution, cost effectiveness, subcontractors, key performance indicators, terms and conditions, DBE preference, optional support services, and future local government-targeted resource program offerings. The IE was provided an opportunity to review PG&E’s draft response to each question prior to release to the bidders. The responses were complete and accurate. PG&E provided responses to all bidder questions by November 26, 2019, which was within the acceptable timeframe recommended by the PRG.

Table 4.2: Bidder Conferences	
RFA Bidder Conference Date	June 5, 2019
No. of Attendees	Unknown (via Webex)
No. of Q&A Received	73
RFP Bidder Conference Date	November 14, 2019
No. of Attendees	Unknown (via Webex)
No. of Q&A Received	108

4.3 Solicitation Design Assessment

PG&E’s LGP solicitation conforms with the CPUC requirements for a competitive, two-stage solicitation with oversight from its PRG and active monitoring of all solicitation activities by the IE.

The solicitation design met PG&E’s intended need to have non-resource local government partnerships that directly support the increase in energy efficiency adoption in the public sector buildings as well as among local communities. PG&E’s Business Plan looks to:

“...empower customers with the expertise and tools they need to efficiently manage their energy use. Working with public sector customers will be crucial to meeting California’s ambitious energy goals. Not only can the public sector achieve significant energy savings through its own facilities and infrastructure, but these public sector customers are also leaders and influencers in their communities.”⁸

The solicitation looked to reset the scope of prior local government partnerships by focusing the solicitation scope primarily on increasing energy efficiency in public buildings. This scope clearly aligns directly with many of PG&E’s public sector metrics that look to achieve the same result.

5. RFA and RFP Design and Materials Assessment

5.1 Design Requirements and Materials

PG&E’s RFA design properly balanced the need for information to evaluate bidder abstracts and the resource burden on the bidder in responding to the RFA. PG&E, in collaboration with the IE, reduced the RFA requirements to only the essential items (e.g., program design and operations, experience, innovation/IDS, expected outcomes). Bids had an eight-page limit for each abstract. The focused abstract requirements allowed the bidder to concisely present their program concept and the IOU to efficiently and effectively evaluate bids. Under this two-stage solicitation approach, abstract requirements focused on the most important program design elements, which should be a best practice for all future solicitations.

The IE provided 30 discrete comments to PG&E on its draft RFA materials including the evaluation scoring rubric. All but three recommendations were accepted by PG&E. The three recommendations encouraged greater clarity to bidders regarding their legal rights under California law. These comments were considered by PG&E, yet the IOU believed there was already adequate clarity provided to bidders.

PG&E developed the scoring rubric along with the RFA materials; however, the scorecard (with

⁸ PG&E Energy Efficiency Business Plan, 2018-2025, Chapter 4.A.

scoring elements and definitions) was produced after the RFA was released. This limited the ability of the IOU to make improvements to the scorecard since bidder information was limited to the already-released RFA. For future solicitations, the scoring rubric and supporting scorecard should be developed concurrently with the RFA.

5.2 Response to PRG and IE Advice

Consistent with PG&E's RFA design, the RFP properly balanced the need for information to evaluate bidder proposals and the burden on the bidder in responding to the RFP. The RFP included general instructions and a Response Form (narrative and data) along with the applicable CPUC standard and modifiable contract terms and conditions. PG&E also presented its proposed Company-specific terms and conditions for bidder consideration. PG&E asked bidders to provide responses to 39 questions pertaining to their proposed program design. The RFP imposed reasonable word-limits that allowed ample opportunity to provide a clear and complete response. In the future, PG&E should consider reducing the number of bidder questions for future non-resource RFPs.

The IE provided 44 discrete comments and corresponding recommendations, which were all accepted by PG&E. The comments were primarily focused on improving the quality and compliance of the RFP's general instructions, narrative response form, and the scoring framework.

5.3 Responses to PRG and IE Advice

RFA

Overall, PG&E was very receptive to all input provided by the IE and the PRG throughout the development and implementation of the solicitation. Nearly all comments were accepted, and recommendations incorporated by the IOU. Early on, certain PRG members expressed their concerns regarding the RFA's limited eligibility requirements. In response, PG&E worked with the IE to further expand eligibility. These changes were acceptable to the concerned PRG members. Also, some PRG members shared their reservation regarding the future of a non-resource partnership model given the current emphasis on cost-effective energy savings results. However, PG&E's solicitation approach focuses local governments on tangible, near-term results which lead directly to energy savings in the public sector and in the local communities. PG&E is hopeful this new focus will cultivate new and fresh program concepts from bidders.

RFP

As with the RFA, PG&E was very receptive to all IE and PRG input provided throughout the development and implementation of the solicitation. The IE and PRG comments regarding the LGP RFP were accepted, and recommendations incorporated into the final RFP by the IOU with one exception. The PRG recommended that the RFP scorecard weighting for the proposed key performance indicators [REDACTED]. IE supported the IOU's action as this weighting was equal to weights assigned to the innovation and program design criteria.

6. Bid Evaluation Methodology Assessment

6.1 Bid Screening Process

RFA

Prior to scoring, PG&E screened the abstracts for:

- Timeliness
- Completeness (substantively incomplete or exceeds length limitations)
- Non-responsive to the objectives and requirements of the RFA
- Conflict of interest exists, as determined by PG&E

In the RFA, PG&E did not disclose selection criteria. However, PG&E did provide a general list of factors that would be used to evaluate all abstracts including:

- The bidder's experience working with local governments
- Overall alignment with future portfolio vision laid out in the PG&E Business Plan, PG&E Solicitation Plan, and metrics
- Confidence in the assessment and underlying assumptions of the proposed program impact and benefits
- The proposal demonstrates an awareness and understanding of all key implementation steps
- The proposed organization possess the qualifications and capabilities essential for program execution
- The proposed organization demonstrates a successful track record of prior program implementation experience
- The proposed program incorporates new, innovative or unique program design elements that will enhance program effectiveness
- Completeness of the proposal and responsiveness to the requirements of this RFA

PG&E indicated that these factors were not necessarily listed in any order of importance. PG&E also stated that at its sole discretion it may decide to use some or all of these factors when evaluating the potential value of a proposed program in PG&E's portfolio.

RFP

PG&E invited 14 bidders to the RFP stage. The IOU conducted a pre-screening process to confirm each proposal was eligible to for further evaluation using the following criteria:

- Eligibility Criterion 1: Participation in Previous RFA
To be eligible for this RFP, Bidders must have participated in the prior PG&E RFA and been notified that their abstract was selected to advance to this RFP.
- Eligibility Criterion 2: Local Government Relevance
This targeted solicitation for non-resource LGP Programs is limited to Bidders who are well positioned within or with relevant relationships or other access to local governments. Bidders must meet one of these three criteria, or their proposals will not be scored:
 - Existing lead local partners (LLP) of the current PG&E LGP Programs
 - Local Governments

- Entities who have an existing relationship with local government(s) and who can leverage local government expertise, access and infrastructure to implement energy efficiency programs
- Eligibility Criterion 3: Program Evaluation Contractors and Consultants
Pursuant to CPUC Decision 05-01-055 – Interim Opinion on the Administrative Structure for Energy Efficiency: Threshold Issues, program evaluation, measurement and verification (EM&V), activities must be transparent and independent to support sound Commission decision-making and portfolio administration. The EM&V structure must be shielded from potential conflicts of interest to ensure independence and transparency of the evaluation process.

Allowing EM&V consultants (or their firms) who perform program and portfolio impact-related studies to also be involved in LGP Program delivery creates a conflict-of-interest. To address this conflict-of-interest, EM&V consultants (or their firms) that perform program and portfolio impact-related studies in California are prohibited from also participating in this RFP. Any business entity that is a Bidder in this solicitation process and also affiliated with an EM&V consultant (or their firms) performing load impact studies, must demonstrate how both their business entities are clearly demarcated. The Bidder must describe all established firewalls and any other protections in place to ensure separation and effectively mitigate any perceived or potential conflict-of-interest for their proposal to be considered for evaluation. A current list of impact evaluation contractors and subcontractors is at:

<http://www.cpuc.ca.gov/evaluation/>

- Eligibility Criterion 4: IOU Affiliates
CPUC Decision 05-01-055 prohibits any transaction between a California investor-owned utility (IOU) and any program implementer for EE that is a California affiliate of an IOU.⁹ All Bidders must acknowledge that they are not an affiliate of any IOU. Such disclosure will be included in the response hereto. Failure to accurately respond will result in immediate rejection and disqualification from this RFP.
- Eligibility Criterion 5: Consistency with RFA Scope
Bidders must submit a proposal that substantively aligns with the program design described in their abstract submitted in the Stage-1 RFA solicitation process. The RFA evaluation of the Bidder’s abstract is the basis for PG&E enabling a Bidder to advance to later stages of this RFP solicitation process, and continuity between the abstract and the proposal is required. Bidders are encouraged to elaborate and improve upon their abstract without changing the main features of their program design. Proposals that fail to maintain consistency with the abstract that was originally proposed in the RFA stage will not be considered for further evaluation in the RFP.

Bidders proposing changes to key program design characteristics submitted in their abstract are required to clearly identify and explain the purpose of the change within their narrative proposal. Examples of key program characteristics include:

⁹ D.05-01-055, OP 2, “As discussed in this decision, transactions between the IOUs and any program implementer that is an affiliate of PG&E, SCE, SDG&E or SoCalGas are prohibited, without exception. This ban becomes effective for the 2006 program year and beyond.”

- program theory, including market channel, strategies and expected outputs and outcomes;
- customer sizes, sectors and segments targeted;
- geographies and customer sizes served; or
- changes to non-resource program elements that support energy savings acquisition.

6.2 Scoring Rubric Design

RFA

The following is the scoring rubric PG&E used when evaluating abstracts received in the RFA stage.

Category	Sub-Category	Weighting
Program Concept	LGP Alignment	
	Portfolio Alignment	
Company Experience & Qualifications	Team Composition & Qualifications	
	Prior Program Implementation Experience	
Innovation	Program Design Features	

Overall, the scoring rubric properly supported the evaluation of the non-resource local government partnership abstracts. Without need to evaluate energy savings forecasts, the evaluation focused on the abstract’s alignment with the desired outcomes (e.g., energy savings in public buildings) as stated in the RFA. Also, the rubric had considered program Innovation, as this is one of the CPUC’s key policy reasons for pursuing third-party program implementation. The [REDACTED] weighting assigned to Innovation was consistent with the PRG’s recommended weighting.

RFP

The following is the scoring rubric PG&E used when evaluating abstracts received in the RFP stage.

Category	Weighting
Program Design & Innovation	
Program Feasibility	
Cost & Performance	
Team Experience & Qualifications	
Supply Mgmt.	

As with the RFA, the RFP scoring rubric properly supported the evaluation of the non-resource local government partnership abstracts. Without need to evaluate energy savings forecasts, the evaluation focused on the abstract’s alignment with the desired outcomes (e.g., energy savings in public buildings) as stated in the RFP.

6.3 Evaluation Team Profile

RFA AND RFP

PG&E held a group training session for the scoring team prior to evaluating the LGP abstracts. Both the RFA and RFP training included an overview of the solicitation materials, conformance with the Company’s code of conduct including the conflict of interest policies, scoring criteria, and scorecard. There was no conflict of interest reported by PG&E or its team members.

Position Title	Position Role	Area Scored
[REDACTED]	Program	Entire Abstract, Proposal
[REDACTED]	Program	Entire Abstract, Proposal
[REDACTED]	Policy	Entire Abstract, Proposal
[REDACTED]	Program	Entire Abstract, Proposal

6.4 Response to PRG and IE Advice

RFA AND RFP

PG&E accepted all applicable PRG recommendations with the one exception. The PRG recommended that the IOU provide an opportunity for non-winning bidders to discuss or otherwise learn from PG&E what future improvements could be made to future proposals. In response, PG&E does not want to have such discussions with non-winning Bidders while the program solicitation is still active. PG&E did provide optional debriefing sessions to those bidders who were not awarded a Contract.

7. Final Bid Selection Assessment

PG&E applied the same scoring methodology to all abstracts and proposals. No exceptions were made. All information provided by the bidder was scored as part of the evaluation process. This outcome was helped by PG&E’s desire to limit bidder information to only the most essential elements. Overall, PG&E’s evaluation approach was neutral and conducted in a transparent manner.

7.1 Conformance with Established Evaluation Processes

RFA AND RFP

The IE monitored both RFA and RFP evaluation processes including all team calibration meetings. In both stages, the team was assigned standard scorecards that reflected the scoring criteria presented in the RFA and RFP. The PG&E evaluators individually scored each abstract and proposal and independently provided their preliminary scores to PG&E’s project lead prior to the calibration meetings. Evaluators were discouraged from discussing their evaluations with other team members until the calibration meetings.

The calibration meetings were held to address any significant differences among scorers for discrete scoring elements. During the meeting, team members were encouraged to share how they applied the scoring guidelines in their evaluations. Data input errors could also be discovered at that time. Team members, at their own discretion, were allowed to adjust their initial score to correct for

misapplication of the scoring guidelines or misunderstanding of the bidder's response. In certain instances, team members elected to adjust scores. All adjustments seemed reasonable and well-founded. The IE did not see any team member force their perspective onto others during either the RFA or RFP calibration meetings. Discussions were well-reasoned, professional and at no time was any score team member coerced into changing their scores. The IE had no significant disagreements with the score team's assessments.

The IOU presented its RFA shortlist selections and RFP rankings to the PRG during the monthly PRG meetings. The IOU discussed the rationale of its selection and the IE confirmed that it had monitored all aspects of the evaluation process including attending PG&E's shortlist meeting. The PRG did confirm that the proposed abstract budgets were in alignment with the RFA's stated budget. The PRG was also concerned about regions that may not be served by an LGP; however, the PRG, ultimately, supported PG&E's final shortlist.

7.2 Management of Deficient Bids

PG&E did not receive any deficient bids as part of the LGP RFA or RFP stages.

7.3 Shortlist and Final Selections

PG&E's approach to identifying the RFA bidder shortlist and selecting the final proposals was transparent, well-reasoned, and fair. The IOU followed its Solicitation Plan¹⁰ as presented in their Business Plan application which consisted of a two-stage solicitation relying on an RFA and RFP stages to determine final selections. Selected bidders were invited to contract negotiations. All bidders who were invited to the contract negotiations did execute a contract with PG&E.

A. CONFORMANCE WITH ESTABLISHED EVALUATION PROCESSES

The IOU used the final aggregate team scores to rank both abstracts and proposals. In both the RFA and RFP evaluations, PG&E looked for natural breaks among scores to identify the bidder shortlist. During the final selection meeting the IOU discussed the following:

- LGP coverage across the whole of the service territory.
- The need to adjust some of the LGP proposed scopes to remove cost-inefficiencies and/or tactics that did not directly support EE retrofits.
- Lower scoring LGP bids and their strengths and weaknesses and whether they should be selected.
- Allocation of RFP budget across the final selections and the corresponding unallocated budget.
- The heavy reliance on strategic energy management strategies (resource-focused program offering) directed at wastewater facilities by the Staples and Associates proposal.
- Expansion of certain LGP scope to improve geographical coverage especially for DAC or HTR customers.

As a result of these discussions, PG&E only selected bids that scored above 60 points noting the quality of bids below this score seemed too low to fund. They also decided not to select the Staples and Associates bid as it did not fully align with the scope of the non-resource RFP. The bid included strategic energy management, a resource strategy, to local government's with water

¹⁰ Pacific Gas & Electric Company Third Party Solicitation Process Proposal, August 4, 2017, pp. 6-8.

wastewater treatment plants.

Table 7.1: LGP Proposal Ranking

Rank	Proposer	Score	Comments	Notes
1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
5	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
6	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
7	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
8	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
9	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
10	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
12	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
13	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
14	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
15	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
16	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
17	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
18	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
19	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
20	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Overall, PG&E implementation of the LGP solicitation was sound and reasonable and resulted in the selection that received the highest scores. The IOU presented its RFP final selections to the PRG during the monthly PRG meetings. For the RFP stages, the IOU discussed the rationale of its selection and the IE confirmed that it had monitored all aspects of the evaluation process including attending PG&E’s calibration and selection meetings.

B. PORTFOLIO FIT

PG&E selected 8 LG implementers to deliver a variety of EE services to a varied and unique set of regions throughout its service territory. Each of the LGPs plan to identify and refer specific EE projects to the resource programs delivered by other third-parties in PG&E’s EE program portfolio. Once the third-party resource programs are approved, the LGPs will begin refining their offering based on the final resource program offering. Public sector resource program contracts are schedule for implementation in early 2021.

Since many of the bidders proposed to serve specific regions and/or local governments, PG&E considered if parts of its service territory would not be addressed by the program(s). In the final selection of these 8 LGIs, it became apparent that not all regions of PG&E’s service territory would be served by the LGP. In response, PG&E asked selected bidders, during contract negotiations,

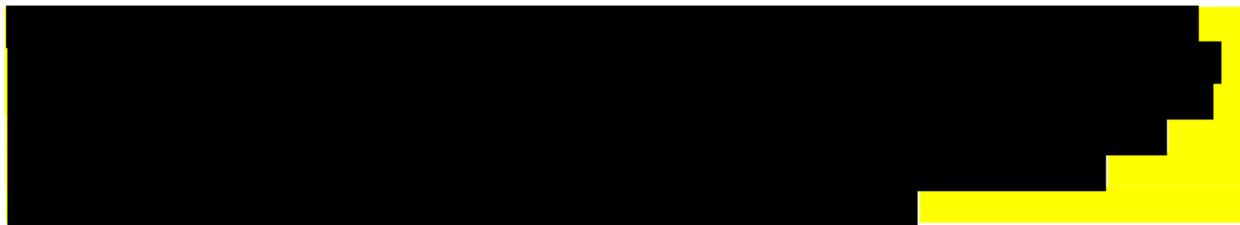


Table 7.2: LGP Geographic Coverage

LGI	Proposed	Final
City and County Association of Governments (CCAG)	San Mateo County	San Mateo County
City and County of San Francisco	City and County of San Francisco	City and County of San Francisco
County of Marin - Community Development Agency	County of Marin	County of Marin
The Energy Coalition	San Luis Obispo and Santa Barbara County	San Luis Obispo and Santa Barbara County
Redwood Coast Energy Authority	Humboldt County	Humboldt County
Sierra Business Council	Counties of Alpine, Amador, Calaveras, El Dorado, Lassen, Mariposa, Nevada, Placer, Plumas, Sierra, and Tuolumne.	Counties of Alpine, Amador, Butte (added), Calaveras, El Dorado, Lassen, Mariposa, Nevada, Placer, Plumas, Sierra, Sutter (added), Tuolumne, and Yuba (added).
San Joaquin Valley Clean Energy Organization	Counties of Fresno, Kern, Kings, Madera, Merced, northern Santa Barbara (removed), San Joaquin, San Luis Obispo (removed), Stanislaus, and Tulare.	Counties of Fresno, Kern, Kings, Monterey (added), Madera, Merced, San Joaquin, Stanislaus, and Tulare.
County of Sonoma	Sonoma County	Sonoma County

The IE encourages PG&E and its LGIs to collaborate with third-party resource program implementers to further refine the roles and responsibilities between LGIs and third-party implementers to capture synergies, avoid confusion for the customer, and accelerate the adoption of EE solutions for the Public sector and HTR/DAC customers in the targeted areas.

C. RESPONSE TO PRG AND IE ADVICE

At the February 2020 PRG meeting, PG&E presented their final selections. Below is a summary of the PRG and IE comments and the IOU’s corresponding responses:

- **PRG Comment:** There are bidders on this list that are part of RENs and CCAs, such as County of Marin. Is there overlap?
IOU Response: Some of these bidders are members of RENs however the main intent of this solicitation is to serve local public facilities and HTR/DAC communities. There is an allowance for overlap with a REN for increasing opportunities for HTR/DAC communities. In terms of customer segment, there is no overlap because the current REN and CCA portfolios do not serve local public facilities.
- **PRG Comment:** The [REDACTED] is being dismissed for proposing strategic energy management (SEM) training for wastewater facilities that may duplicate resource programs.

Are there any resource programs that currently offer SEM training? SEM training is considered an innovative strategy.

IOU Response: That SEM aspect of the proposal was highlighted because it is unique. We understand that SEM training can bring value to the portfolio. However, we see this type of proposal being duplicative of what resource programs would offer. There will be a statewide program that will be directly serving water and wastewater facilities. There are other reasons why we recommend dismissing this proposal. The biggest reason is the size and cost.

- **IE Comment:** The evaluation process asked 38 bidder questions plus required bidders to populate 5 unique workbook tabs. There were similar questions which could be consolidated and/or removed. For example, 17 bidder questions directed at program design. Future solicitations can reduce the number of bidder questions.

IOU Response: PG&E will regularly refresh and look to streamline the volume of bid information making it less onerous for the bidders.

- **IE Comment:** The calibration meeting should address all scoring deviations not just significant deviations. Depending on the weight of a scoring element, an accumulation of point deviations can be impactful to the overall score and final selections especially with 38 unique scoring elements. Also, the IOU's calibration meeting should include a discussion among the evaluators on each bidder question to confirm that evaluators consistently applied the scorecard. Also, consider holding a calibration "check-in" meeting after the evaluation of the first proposal to confirm consistency among scorers.

IOU Response: PG&E looks at both the range of scores in the score team as well as the standard deviation to focus discussion time on areas of the largest disagreement and it seems to be working effectively. We discussed the merits of each proposal overall and specifically discussed scoring criteria which have a range in scores. To use a lower range of would essentially have every score of every proposal discussed and that is excessive from a cost versus benefit perspective. While the calibration meetings have been a venue for great discussion and transparency of the process, we have observed that they ultimately have not translated into any significant shifts in final scores. Changing the score of a single scorer up or down by several points is not incredibly impactful when the score is averaged with the rest of the scores from the scoring team and that is the point of having multiple scorers.

7.4 Affiliate Bids and Conflict of Interest

The CPUC, in Decision 05-01-055, prohibits any transaction between a California IOU and any program implementer for EE that is a California affiliate of an IOU. PG&E required all bidders to acknowledge that they are not an affiliate of any IOU. There was no instance where a California IOU affiliate participated as a bidder in the solicitation.

Additionally, as part of PG&E's evaluation team instructions, PG&E directed each team member to identify any potential conflicts of interests with participating bidders. None were identified as part of this solicitation.

8. Assessment of Selected Bids

8.1 Bid Selection Respond to Portfolio Needs

At the onset of LGP solicitation, PG&E preferred to focus future LGP efforts on supporting the delivery of cost-effective energy efficiency primarily for the Public sector customers, especially those local governments serving HTR and DAC customers. In the RFA and RFP, PG&E put forth the following three general desired outcomes for future LGPs:

1. Increase the opportunities for local government (LG) customers to save energy in local public buildings, especially for those local governments that serve Hard-to-Reach (HTR) customers and/or customers located in disadvantaged communities (DAC).
2. Increase the opportunities to save energy for any HTR customers and/or customers located in DAC through working with the local governments.
3. Improve local government staff capacity to conduct activities that will lead to energy efficiency for the local government and/or its communities.

Each of the selected LGP's, support one or more of these stated goals. Below is a summary table listing the LGP and the corresponding outcome it will support.

LGP	EE Opportunities for Local Governments	HTR/DAC Customers	Increase LG Staff Capacity
City and County Association of Governments (CCAG, San Mateo County)	Integrate energy efficiency and other DSM into all public sector projects.	Reduce energy usage during peak evening hours.	Help municipalities and schools develop and implement energy or climate action plans.
City and County of San Francisco	No focus.	Facilitating projects with deeper and more comprehensive EE savings. Advancing EE community wide.	Improving EE awareness of public sector staff.
County of Marin - Community Development Agency	Support public agencies in achieving energy savings.	Connect local HTR customers to available EE programs.	Support public agencies with understanding energy use through climate action plans.
The Energy Coalition	Supporting energy-saving projects in the public sector by providing tailored project management services.	Focus exclusively on Public sector facilities.	No focus.
Redwood Coast Energy Authority	Drive comprehensive public agency energy projects.	Increase opportunities for HTR customers to save energy.	No focus.
Sierra Business Council	Project identification and implementation to speed navigation of the design/ approval process.	Connect local HTR/DAC SMB customers to available EE programs.	Project identification and implementation to speed navigation of the design/ approval

Table 8.1: Desired Outcomes			
LGP	EE Opportunities for Local Governments	HTR/DAC Customers	Increase LG Staff Capacity
			process.
San Joaquin Valley Clean Energy Organization	Facilitating projects with deeper savings, more comprehensive EE. Increasing awareness among key decision makers in the Public sector.	Focus exclusively on Public sector facilities. Many of the facilities are located in DAC areas.	Improving EE knowledge of key Public sector staff. Advancing EE in Public sector policies. creating and adopting standards for municipal facilities.
County of Sonoma	Identification of EE projects to support energy savings in the Public sector.	Awareness building in the community to magnify the reach of energy efficiency programs.	Training and education to support building capacity to help save energy.

With the exception of the City and County of San Francisco (CCSF),¹¹ all LGPs target Public sector facilities for energy efficiency opportunities. Most LGIs took the opportunity to include strategies focusing on HTR customers and increasing local government staff capabilities typically through benchmarking and energy action plans. The LGP is considered to support PG&E portfolio needs if LGP addresses at least one of the three desired outcomes.

8.2 Bid Selections Provide the Best Overall Value to Ratepayers

LGP OVERVIEWS

The LGPs are tailored to meet the unique needs of their targeted customer groups. Below is a summary of the LGPs offerings that align with PG&E's desired outcomes and portfolio needs.

Table 8.2: LGP Offerings		
LGP	Offering	Segments Served
City and County Association of Governments (CCAG, San Mateo County)	San Mateo County Energy Watch (SMCEW) assists public agencies, K-12 public schools, small, hard-to-reach businesses in accessing energy efficiency programs, trade professionals, and financing opportunities. SMCEW provides coordination, outreach, referrals, and educational resources to help community members pursue energy efficiency projects. Through the Regionally Integrated Climate Action Planning Suite (RICAPS) initiative, SMCEW assists cities in meeting GHG reduction goals by developing annual community inventories and hosting a monthly working group to support energy efficiency and other measures in climate action planning.	Municipal, special districts, K-12 public school districts, small HTR businesses.
City and County of San Francisco	EnergyAccess SF targets hard-to-reach residential and SMB customers with high energy savings potential and propensity, using a two-stage process, employing energy consumption analysis and then layering with City data-sets to identify prospective customers with high savings potential and	Residential: single-family and multi-family. Commercial: small and medium business.

¹¹ The public facilities within CCSF are not served by PG&E.

Table 8.2: LGP Offerings		
LGP	Offering	Segments Served
	propensity to participate.	
County of Marin	The Marin Energy Watch Program (MEWP) will provide EE and climate action plan services and support to Marin’s public sector including the County, cities, towns, school districts, and special districts. MEWP will also engage with the SMB HTR community in the San Rafael Canal area to connect with 3P efficiency resources.	Public and commercial.
Energy Coalition	A Public Sector non-resource Local Government Partnership (LGP) energy efficiency program called Central Coast Leaders in Energy Action Program (CC-LEAP or Program) available to public agencies within the County of San Luis Obispo and parts of the County of Santa Barbara serviced by PG&E. CC-LEAP will provide customized and objective project management, engineering, and financing support services as a “one-stop shop” to enable agencies such as local governments, special districts, and K-12 public schools, to seamlessly identify and implement cost-effective energy retrofits that funnel savings to PG&E and third party resource acquisition programs.	Public agencies including city governments & townships, tribes, county governments, K-12 school districts, water/wastewater agencies/districts, and other public agencies not served by statewide programs.
Redwood Coast	RCEW will assist local governments and public agencies with becoming energy efficiency leaders. RCEW will support cost-effective delivery of resource program services to the Public and hard-to-reach sectors of Humboldt County. RCEW will use an integrated energy management approach to services that presents customers with progressively stepped solutions encouraging deeper retrofits.	Public agencies and HTR customer groups.
Sierra Business Council	The Sierra Business Council’s Sierra Nevada Energy Watch (SNEW) program is designed to further PG&E/CPUC energy efficiency goals through energy efficiency project development activities, planning and policy work, analysis, and outreach/education efforts designed to motivate public sector leaders and unserved small- and medium-sized Businesses (SMB) to increase both capacity and on-the-ground energy efficiency action, especially in rural, HTR and disadvantaged communities of the Sierra Nevada.	Local governments, public agencies, K-12 school districts, HTR/DAC customers, unserved small businesses.
San Joaquin Valley CEO	Public agency focused program to help hard to reach and disadvantaged communities’ access, understand and participate in energy efficiency through IOU administered, third party programs. The program builds on existing relationships, data, processes, and experiences to align to the PG&E portfolio vision for LGPs.	Cities, counties, special districts and K-12 school districts.
Sonoma County	Development of "EE Roadmap" program. High level audits of target facilities performed by PGE 3P Resource Program, qualified staff, or qualified contractor(s). Results in a long-term proposed improvement report for customer along with PG&E third-party resource program referrals and tracking of facility improvement history by LGP. Replicability of the program is a prime goal.	Public, commercial (HTR SMB).

The following addresses the specific attributes of the selected program and the value to ratepayers.

1) ALIGNMENT WITH CALIFORNIA’S ENERGY EFFICIENCY POLICIES AND THE CPUC’S OVERARCHING SOLICITATION POLICY OBJECTIVES:

a) ACHIEVE ALL COST-EFFECTIVE ENERGY EFFICIENCY

As non-resource programs, the LGPs propose to assist the targeted customer groups through various program strategies designed to directly lead the customer to an EE solution. The EE solution will be delivered by a PG&E third-party implementer assigned to the targeted customer group (e.g., Public sector). This approach will reduce the outreach efforts by the third-party implementer while leveraging the LGIs unique and longstanding relationship with their represented customer groups to realize all cost-effective energy efficiency.

b) INNOVATION

To be “innovative,” the RFA and RFP instructed bidders that their proposal must demonstrate that the program will ultimately increase the uptake of cost-effective energy efficiency by advancing a technology, marketing strategy, or delivery approach in a manner different from previous efforts.

Overall, LGPs have evolved their priorities to focus on identifying specific EE projects for local government customers in coordination with third-party resource program implementers. Customer decision-making in the Public sector is unique, fluid, and varies among local governments. The LGIs, all possessing long-term, deep relationships with the targeted local governments, are well-positioned to directly influence the local government’s decision-making process.

With the innovative overhaul of the LGP model, it is expected that local government EE projects will grow significantly over the next three years. If not, PG&E should reconsider its investment in such a model or once again reimagine the LG engagement model with an expanded scope to include IDSM solutions to reduce the customer’s energy costs and support California’s aggressive carbon reduction policies. Below is a summary of the innovative offerings for each LGP.

LGP	Innovations
City and County Association of Governments (CCAG, San Mateo County)	Program innovation is centered around Technology (handheld devices to capture customer data), Collaborative Marketing (identify customer’s complete energy management opportunities including IDSM), and Customized Reports/Plans (energy action plans and benchmarking).
City and County of San Francisco	Application of a data-driven, multi-tiered, customer targeting to efficiently direct outreach towards HTR and DAC customers with the highest energy-savings potential.
County of Marin - Community Development Agency	Develop climate action plans for school districts, develop template ZNE facility plans and capital improvement plans, and develop case studies directed at public works and maintenance staff.
The Energy Coalition	Streamlined data analytics, partnerships for emerging technologies, and

Table 8.3: LGP Innovations	
LGP	Innovations
	continuous improvement procedures.
Redwood Coast Energy Authority	Customer-centric approach, identify opportunities across all resource offerings, bundle project leads, energy project roadmaps, business and political endorsements, procurement support, technical review, benchmarking, and IDSM promotions.
Sierra Business Council	Solicitation support, layered business services integrating LGP activities into existing SBC local government programmatic work, customized messaging emphasizing “resiliency”, improved access to information, hands-on technical and project management assistance, and regionally-specific funding.
San Joaquin Valley Clean Energy Organization	The CCEW is not, inherently, an innovative program. The CCEW is a program that moves customers towards accessing innovative third-party resource programs. The CCEW focuses in on building actionable pipelines from data that will empower public agencies to make informed choices.
County of Sonoma	Modeling of “EE Roadmap” for public facilities, implementing California Green Business Certification, offering construction planning support, documenting an integrated services delivery model, and implementing a Public Building Energy Efficiency Roadmap Program.

c) IDSM

Most LGPs will promote various IDSM opportunities to their targeted customer groups. However, there was no specific IDSM budget (EE/DR integration) identified for any LGP. The following is a listing of these strategies to promote IDSM to the customer that will be employed by the LGPs.

Table 8.4: IDSM Program Strategies			
LGP	Strategy	LGP	Strategy
CCAG (San Mateo County)	Inform customers on IDSM opportunities.	Redwood Coast	Inform customers on IDSM opportunities.
City and County of San Francisco	Provides demand response capabilities through technologies.	Sierra Business Council	Inform customer on IDSM opportunities.
County of Marin	None.	San Joaquin Valley CEO	Digital engagement and activities to educate participants about EE with other IDSM approaches.
Energy Coalition	None.	Sonoma County	Lead generation for demand response programs.

d) HARD-TO-REACH MARKETS (HTR), DISADVANTAGED COMMUNITIES (DAC), DISADVANTAGED WORKERS, AND WORKFORCE STANDARDS

i) HTR/DAC CUSTOMER FACILITIES

In response to PG&E’s call to the bidders to address customers located in DACs and serve HTR customers, each of the final LGP offerings include strategies that target HTR and DAC customers. The following table identifies the specific HTR and DAC strategies of each LGP:

Table 8.5: HTR and DAC Program Strategies			
LGP	Strategy	LGP	Strategy
CCAG (San Mateo County)	Identify potential EE projects for commercial HTR and DAC customers.	Redwood Coast	Identify potential EE projects for commercial HTR customers.
City and County of San Francisco	Identify potential EE projects for commercial and residential HTR and DAC customers.	Sierra Business Council	Identify potential EE projects for commercial HTR customers.
County of Marin	Identify potential EE projects for commercial HTR customers.	San Joaquin Valley CEO	None.
Energy Coalition	None.	Sonoma County	Identify potential EE projects for commercial HTR customers.

ii) DISADVANTAGED WORKER POLICY

As for supporting Disadvantaged Workers (DW), the LGPs have agreed to comply with disadvantaged worker requirements presented in the final Implementation Plans (IPs). No other related contractual obligations are included in the Contracts.

In review of the final IPs, the Disadvantaged Worker Plan is generally lacking specifics regarding how the LGP can support DW policies and the frequency of reporting. This is due in part to many of the LGP relying on established staff, including city and county staff, to operate the program. As opportunities arise to employ new staff, the LGP should look to ways to support the CPUC’s DW policy. To this end, PG&E should work with LGPs on how the program can support DW policies and update the IPs, as necessary.

iii) WORKFORCE STANDARDS POLICY

As non-resource programs, the LGPs do not offer services that include the installation of HVAC equipment or advanced lighting controls.

e) DEEP & PERSISTENT ENERGY SAVINGS

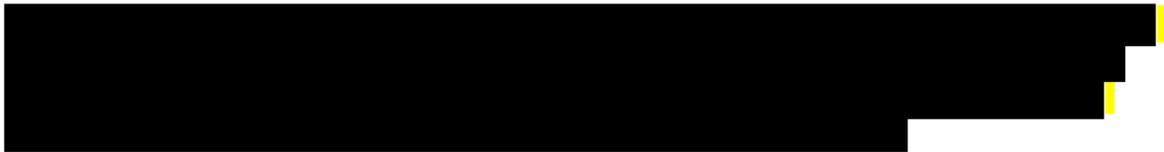
The LGPs, as non-resource programs, do not directly provide energy savings to the PG&E EE portfolio. The LGPs do work directly with targeted customer groups to produce a “pipeline” of EE project opportunities to third-party resource programs in the IOU’s portfolio. For example, the LGPs are focused directing local governments to EE investments that will produce longer-term EE savings.

f) BALANCE OF RISK AMONG PROGRAM ADMINISTRATOR, IMPLEMENTER, CUSTOMER AND RATEPAYER

i) COMPENSATION STRUCTURE

For all LGPs, the compensation structure is based on time and material. The CPUC, in D.19-08-006, stated that “a ‘pay for performance’ standard term places local governments at risk of non-recovery of public funds.”¹² As a result, the Decision directs the IOUs to use a unique set of CPUC terms and conditions that does not have a preference for pay-for-performance contracting with LGIs. The time and material compensation structure for all contracts is consistent with the CPUC directive and, for non-profits, consistent with their tax-exempt status.

The agreed to rates, by position title, presented in the Contracts are fully loaded. PG&E confirmed the reasonableness of the contracted rates relative to existing LGP contracts. No anomalies were identified. The rates varied based on the individual region within California. Such rate sensitivity should be applied in other contracts. Specifically, the rate should reflect the position title and the region where the work is being performed.



ii) REALIZED ENERGY SAVINGS

The LGP offerings, as non-resource programs, do not directly produce energy savings. As previously stated, the LGPs propose to assist the targeted customer groups through various program strategies designed to directly lead the customer to an EE solution and energy savings. The EE solution will be delivered by one of PG&E’s third-party implementers assigned to the targeted customer group.

iii) SUPPORTS PORTFOLIO AND APPLICABLE SECTOR METRICS ACHIEVEMENTS

PG&E’s 2019 Annual Budget Advice Letter provides a list of all CPUC-approved portfolio and sector metrics.¹³ Those metrics include a baseline year (2016) of results and a forecast of expected performance which only extends through 2020. Also, many of the related Public sector indicators (e.g., energy savings per building) do not have corresponding targets.

With the exception of the Public sector metric (#210) focused on increased public sector participation in EE programs, the LGPs do not directly provide results against PG&E’s Public sector metric achievements. However, LGPs will play a critical role, albeit indirect, of achieving many of the Public sector energy savings, emission reduction, and cost-effectiveness related-metrics through increased number of customer EE projects for corresponding third-party resource programs.

¹² Finding of Fact 9.

¹³ Advice 4011-G/5375-E, Attachment 5, dated September 4, 2018.

2) PROGRAM ALIGNMENT WITH EE PLANNING PRINCIPLES

a) REASONABLENESS OF ENERGY SAVINGS GOAL RELATIVE TO TARGETED MARKET'S ENERGY EFFICIENCY POTENTIAL

The LGP offerings, as non-resource programs, do not have specific energy savings goals. The LGPs will coordinate with and support the IOU-selected third-party resource program implementers in their energy savings goal achievements.

b) PROJECTED ENERGY SAVINGS FROM VIABLE MEASURES

The LGP offerings, as non-resource programs, will not directly offer EE measures to the targeted customer groups.

c) COMPLIANCE OF THE PROPOSED PROGRAM WITH CPUC M&V RULES AND REQUIREMENTS

The Contract requires the Program to be consistent with current CPUC Measurement & Verification (M&V) rules and requirements.¹⁴ The Implementer is required to provide a final M&V Plan as part of the program's start-up activities.¹⁵ The Contracts require LGIs to comply with all CPUC directives regarding Program EM&V and must fulfill all EM&V activities as may be required by the CPUC. This includes supporting any data collection required by the CPUC Evaluation Measure and Valuation (EM&V) efforts for non-resource activities completed during the Agreement Term.¹⁶

9. Reasonableness of Contracting Process

9.1 COLLABORATION ON FINAL PROGRAM DESIGN AND SCOPE

The Contracts reflect LGP program offerings proposed and designed by the third-party program implementers. During contract negotiations, the IOU and the LGIs collaborated on improvements to program offerings and geographical coverage.

Since PG&E has not yet authorized new third-party resource programs to begin to work, the LGIs could not clearly link their LGP offering to these pending programs. As these new resource programs begin pre-program launch activities, PG&E should invite the LGIs to collaborate with these new resource program implementers to capture potential program synergies, avoid program overlap, and agree upon the finer points of program coordination (e.g., customer outreach, project hand-offs, etc.). Results of such collaboration can be recorded in the Implementation Plans and corresponding program manuals for both the resource programs and the LGPs.

IOU SUPPORT SERVICES

PG&E will provide minimum utility support services such as PG&E general marketing support, data services, and customer complaint support. These support services are reasonable and will likely improve the program's performance and customer service. PG&E also offered additional support services (i.e., branding support, marketing support, account mgmt. support, and enhanced data support services) at a direct cost (~\$150/hr.) to the LGI. Depending on the LGP offering, some

¹⁴ Part B, Section H.3, p. 27.

¹⁵ Schedule C, Table 10, p. 80.

¹⁶ Section 2.8, Key Performance Indicators and Evaluability.

LGIs opted for various additional support services. A summary of the additional support services selected by the LGPs is presented below:

Table 9.1: Additional IOU Services Selected		
LGP	Additional Services	Budget (3 Yrs.)
CCAG (San Mateo County)	[REDACTED]	[REDACTED]
City and County of San Francisco	[REDACTED]	[REDACTED]
County of Marin	[REDACTED]	[REDACTED]
Energy Coalition	[REDACTED]	[REDACTED]
Redwood Coast	[REDACTED]	[REDACTED]
Sierra Business Council	[REDACTED]	[REDACTED]
San Joaquin Valley CEO	[REDACTED]	[REDACTED]
Sonoma County	[REDACTED]	[REDACTED]

CHANGES TO SCOPE

Many of the LGP’s initial program scopes did not change. [REDACTED]

COORDINATION WITH RESOURCE PROGRAMS

As the CPUC approves the Public, Commercial, and Residential sector 3P resource contracts, PG&E should hold coordination meetings with the LG implementers and the relevant third-party resource programs to identify critical links among the programs including identifying organizational roles and responsibilities and creating a seamless customer engagement approach. The outcome of these discussions could be reflected in the Implementation Plans (i.e., program manuals) as well as any updates to the LGP contracts, if necessary.

KEY PERFORMANCE INDICATORS

During negotiations, PG&E encouraged all LGIs to propose two types of KPIs: foundational and supporting. Foundational KPIs are tethered to the LGI’s ability to create EE project pipelines and lead generation for third-party resource programs. Supporting KPIs are focused on supporting foundational KPI achievement such as building benchmarking and LG educational engagements.

The Contract KPIs directly support the three LGP goals (EE for public facilities, EE for DAC/HTR customers, and local government EE capacity building). The IE fully supported PG&E’s approach to direct the LGIs to create two types of KPIs. The LGIs were free to propose KPIs that best fit their unique program design, however, all KPIs tied to at least one of the three LGP solicitation goals. PG&E should apply this to future contract negotiations to improve the consistency and number of KPIs across resource programs.

9.2 FAIRNESS OF NEGOTIATIONS

Overall, the negotiations with the IOU and the winning bidders were fair and reasonable. PG&E opted not to conduct competitive negotiations, rather it looked for ways to improve the program

offering, reduce unnecessary program costs, and arrange the program scope to maximize the program’s coverage over a given region.

SOLICITATION BUDGET

Throughout contract negotiations, the IOU negotiated with the bidder to identify opportunities to reduce unnecessary program activities and adjust the LGP scope to either expand coverage or reduce regional coverage. In some cases, program scope changed as some activities were refined or eliminated. Below is a list of initial budgets as part of the bidders’ proposal in response to the RFP and the final budget at the conclusion of contract negotiations.

LGP	Initial Budget (3 yrs.)	Final Budget (3 yrs.)	Adjustments
CCAG (San Mateo County)		\$972,000	
City and County of San Francisco	0	2,450,000	
County of Marin		566,000	
Energy Coalition		748,000	
Redwood Coast		766,000	
Sierra Business Council		1,827,000	
San Joaquin Valley CEO		1,965,000	
Sonoma County		855,000	
Total		\$10,149,000	

9.3 CHANGES TO CONTRACT TERMS & CONDITIONS

To be compliant with CPUC directives, PG&E provided bidders both the standard and modifiable CPUC terms and conditions. At the IE’s request, PG&E provided the bidder with a two-column document that included the CPUC’s standard and modifiable terms (left column) and PG&E’s proposed redline changes to both the standard and modifiable terms (right column). This document proved to be a very useful tool for the IE.

In the final Contract, the CPUC and PG&E terms and conditions are combined throughout. The IE has reviewed all documents and confirmed the CPUC’s terms and conditions are included in the agreement with the specific modifications as discussed below:

- **CPUC Standard Terms** - PG&E’s proposed adjustments to the CPUC standard terms. It is the IE’s opinion that PG&E’s changes do not undermine or contradict the CPUC standard terms. All PG&E’s changes are simple name changes or permissible word inserts with the exception of the Dispute Resolution clause.¹⁷ In the Contract, PG&E inserted additional terms that addressed security and timeliness issues. These additions are appropriate as they address a void in the CPUC terms and help facilitate the dispute resolution process.
- **Order of Precedence** – In response to the IE’s recommendation, PG&E did incorporate an additional provision in the Contract that if there is a conflict among provisions within the Contract, the CPUC’s standard terms are given priority and take precedence.
- **CPUC Modifiable Terms** - With respect to the CPUC’s modifiable terms, PG&E did make

¹⁷ Attachment 1, Section 9.1.

numerous and substantial changes (i.e., Workforce, Implementation Plan, Definitions, Term, Payment Terms, EM&V, and Data Collection and Security). Most of these changes are not detrimental or severe and do help with the contract administration. However, there are a few changes that can be considered favoring the IOU position such as intellectual property, liability, and indemnification (the latter two only because they may tend to be a bit overprotective and may be construed as minor infringement upon the CPUC Standard terms, however all of these are intended to protect the ratepayer's funds).



9.4 CONFORMANCE WITH CPUC POLICIES AND OBJECTIVES

Overall, the Contract directs the implementer to conform to all applicable CPUC energy efficiency policies. Below is a discussion of key CPUC policies, programmatic and solicitation issues not previously discussed.

25 PERCENT THIRD-PARTY REQUIREMENT

The final LGP contract was executed on June 19, 2020 prior to PG&E's June 30, 2020 deadline for counting the program budget towards the IOU's minimum 25% third-party threshold requirement.¹⁸ As all LGP Contracts represent a third-party designed program, the total Contract values should contribute to the IOU's minimum threshold requirement.

In the calculation of the minimum threshold requirement it is unclear whether the additional EE and DR integration budget¹⁹ should be included. The CPUC should provide greater clarity to the IOUs on the proper calculation to be applied to the third-party threshold requirement. This should include direction on the specific annual budgets to be included in the numerator and denominator within the calculation. The CPUC should also direct the IOUs to report their threshold accomplishments, supported by calculations, in the annual budget advice letter and/or annual energy efficiency report.

PROGRAM TRANSITION PLAN

PG&E's Solicitation Plan provides an approach to transitioning existing IOU EE projects to the new third-party implementers. In short, the IOU will work with the implementer to craft a transition plan and once the terms of the transition are met, the third-party becomes the program implementer.²⁰ The Contract does not address any specific transition plans from preexisting LGPs. As with the new LGPs, the preexisting LGPs were non-resource programs and do not have any existing customer EE projects. However, LG implementers who have expanded their preexisting LG region should coordinate with the prior implementer on any transfer items (e.g., customer EE

¹⁸ CPUC Letter to IOUs regarding the "Request for Extension of Time to Comply with Ordering Paragraph 4 of Decision 18-05-041", November 25, 2019.

¹⁹ D.18-05-041, OP10, p. 184.

²⁰ Pacific Gas and Electric Company (U 39-M) Third Party Solicitation Process Proposal, dated August 7, 2017, Section VI.B, pp. 21-22.

interest lists, etc.).

IMPLEMENTATION PLAN

By the end of August 2020, and in compliance with CPUC direction,²¹ PG&E uploaded each of the final program Implementation Plans (IPs) to the CPUC's CEDARS system within 60-days of final contract execution for all LGPs.

On August 14, 2020, PG&E held a public workshop on the LGP draft Implementation Plans. The 8 LGPs presented an overview of their individual draft IPs. Approximately 40 attended the meeting which mainly included representatives from the LGPs and the IOUs. This was the first and only time LG implementers could preview each other's programs. As a result, a few LG implementers suggested that an LGP working group be formed to share best practices regarding program delivery. In response, PG&E encouraged implementers to individually contact each other if they were interested in sharing.

The IE provided comments to PG&E on the 8 draft IPs on August 18, 2020. Overall, the draft IPs reflected the program designs presented in the executed Contracts. Below is a list of IE comments and recommendations on improving the IPs:

- Include a standard budget table across all IPs representing the program budget by calendar year and by cost category.
- Program manuals were generally lacking or not included. Future program manual updates should record the linkage between the LGP and third-party resource programs, including specific details regarding roles and responsibilities and customer engagement.
- The program logic model diagrams (PLMs) were generally lacking. LG implementers should reference PG&E's RFP for more information on PLMs.
- Subcontractors referenced in the IP are not always listed in the Contract.²²
- Disadvantaged Worker (DAW) Plan is generally lacking specifics regarding how the LGP can support DAW policies and the frequency of reporting. PG&E should work with the implementers on how the program(s) can support DAW policies, if applicable to program offering.
- EM&V Plans were generally lacking. Typically, process evaluations are performed for such non-resource programs. PG&E should coordinate with the CPUC and implementers on any future plans to evaluate these LGPs. Any EM&V plans should be reflected in future IP updates.

IOU DEBRIEFING SESSIONS WITH PARTICIPATING BIDDERS

In response to public feedback at a CPUC semiannual workshop on the IOUs' program solicitation, PG&E offered to hold one-on-one debriefing sessions with those bidders who were not selected. PG&E completed the individual debriefings sessions with LGP bidders by end of August 2020.

²¹ D.18-01-004, OP 10.

²² Exhibit A1.

strengths and weaknesses of the proposal against these six criteria. No greater level of detail was offered by PG&E. Most bidders asked for more information regarding the evaluation of specific aspects of their proposal, although many bidders understood that PG&E could not share such detailed information.

Also, PG&E did specifically ask for feedback on its solicitation process. Many bidders appreciated the debriefing session and noted that feedback was rarely provided in other solicitations. The following is a list of individual bidder feedback collected by the IE during the debriefing sessions. Note the feedback doesn't reflect the opinions of all bidders and may reflect the opinion of only one bidder.

- Some bidders were frustrated with the lack of detail during the debriefing sessions while others understood the limitations.
- More communication to bidders on the on-going status of the solicitation would help bidders and its subcontractors with their own planning.
- Communicate the outcome of the solicitation sooner so, the bidder(s) can develop other business opportunities.
- Provide a specific budget information in the both the RFA and RFP to help guide bidders on expected program size. (Note - The RFP covered multiple programs but did not assign a specific budget by program/region. The LGP solicitation included an overall \$5 million budget.)
- Many bidders complimented PG&E on its PowerAdvocate solicitation platform which bidders thought worked very well throughout the solicitation.
- In some cases, the RFA and RFP asked for the same information. PG&E should improve this in the future.
- RFA and RFP requirements were reasonable relative to federal and state-run solicitations.
- Appreciated that the detailed budget information was not required in the RFA.
- Plenty of time to prepare proposals which allowed bidders to further identify subcontractors.
- Appreciation for the role of the IE and the ongoing monitoring.
- PG&E should consider non-profit status in the evaluation of the supply chain responsibilities.

Although some bidders were frustrated by the lack of details regarding the evaluation of their proposals, PG&E did list areas of strengths and weakness with their proposals which could be easily matched to the RFA and RFP requirements by the bidder. This opportunity provided by PG&E for bidder self-reflection, if they choose to do so, can provide them with valuable insights to areas where they could improve upon in future proposals. Some bidders had the insight to see this opportunity while others simply expressed their frustration. PG&E staff did an outstanding job managing the debriefing session especially given the level of emotions with certain bidders. PG&E should continue to hold debriefing sessions while appropriately setting bidder expectations on the level of information that can be shared.

9.5 UNIFORMITY OF CONTRACT CHANGES

After the conclusion of PG&E's final bid selections, the IOU entered contract negotiations with the selected bidders. As a starting point for negotiations, and consistent with CPUC direction, PG&E gave the bidders the set of CPUC standard and modifiable terms and conditions. Along with these

CPUC's terms and conditions, the IOU provided its own proposed additional terms in a separate document. At the conclusion of both contract negotiations, the contract terms and conditions were the same among all bidders. As previously discussed, there were no changes made to the CPUC standard terms and conditions (see, Section 9.3 Changes to Contract Terms & Conditions).

Public Attachment B

Local Government Partnerships Energy Efficiency Third-Party Solicitation Advice Letter

Program-Level Measurement & Verification Plan

Attachment B: Program-Level & Measurement & Verification Plan

There are no contracted programs calling for an exception to Normalized Metered Energy Consumption (NMEC) rules in the Local Government Partnerships contracts.

PACIFIC GAS AND ELECTRIC COMPANY

PART 2 CONFIDENTIAL VERSION

February 10, 2023

Confidential Appendix A

**Local Government Partnerships Program
Energy Efficiency Third-Party Solicitation Advice Letter**

Independent Evaluator's Final Report

(Confidential)

February 10, 2023

Confidential Appendix B

**Local Government Partnerships Program
Energy Efficiency Third-Party Solicitation Advice Letter**

Solicitation Process Overview

(Confidential)

February 10, 2023

Confidential Appendix C

**Local Government Partnerships Program
Energy Efficiency Third-Party Solicitation Advice Letter**

Selection Spreadsheet

(Confidential)

February 10, 2023

Confidential Appendix D

**Local Government Partnerships Program
Energy Efficiency Third-Party Solicitation Advice Letter**

Third Party Contract Summary

(Confidential)

February 10, 2023

Confidential Appendix E

**Local Government Partnerships Program
Energy Efficiency Third-Party Solicitation Advice Letter**

Third-Party Contracts

(Confidential)

February 10, 2023

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

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
Braun Blaising Smith Wynne, P.C.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell
Downey Brand LLP
Dish Wireless L.L.C.

East Bay Community Energy Ellison
Schneider & Harris LLP
Engineers and Scientists of California

GenOn Energy, Inc.
Green Power Institute
Hanna & Morton
ICF

iCommLaw
International Power Technology
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McClintock IP
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.

Resource Innovations

SCD Energy Solutions
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Sempra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Stoel Rives LLP

Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy