

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



July 18, 2019

**Advice Letter 4107-G/5563-E**

Erik Jacobson  
Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

**SUBJECT: Marin Clean Energy's and Pacific Gas and Electric Company's Annual Joint Cooperation Memorandum for Program Year 2020**

Dear Mr. Jacobson:

Advice Letter 4107-G/5563-E is effective as of July 17, 2019.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph  
Deputy Executive Director for Energy and Climate Policy/  
Director, Energy Division

June 17, 2019

CA Public Utilities Commission  
Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, CA 94102-3298



**MCE Advice Letter 36-E; PG&E Advice Letter 4107-G/5563-E (ID U39 M)**

**Re: Marin Clean Energy’s and Pacific Gas and Electric Company’s Annual Joint Memorandum of Cooperation for Program Year 2020**

Pursuant to Decision (“D.”) 18-05-041, *Decision Addressing Energy Efficiency Business Plans*, Ordering Paragraph (“OP”) 38, Marin Clean Energy (“MCE”) hereby submits its Annual Joint Cooperation Memorandum for Program Year 2020 (“Joint Cooperation Memo”) with Pacific Gas and Electric Company (“PG&E”) as Advice Letter (“AL”) MCE 36-E; PG&E 4107-G/5563-E.<sup>1</sup>

**Tier Designation**

This AL has a Tier 2 designation pursuant to OP 38 of D.18-05-041, which requires MCE and PG&E to submit their annual Joint Cooperation Memos no later than June 15.

**Effective Date**

Pursuant to General Order 96-B, MCE and PG&E respectfully request that this Tier 2 AL become effective on July 17, 2019, which is 30 calendar days from the date of this filing.

**Background**

On January 17, 2017, MCE and PG&E filed their respective business plans with the California Public Utilities Commission (“Commission”).<sup>2</sup> On June 5, 2018, the Commission issued D.18-05-041 approving the aforementioned business plans.<sup>3</sup> The Commission granted MCE’s and PG&E’s sector-level proposals for the following overlapping sectors: (1) Residential, single family; (2) Residential, multifamily; (3) Commercial; (4) Industrial; (5) Agricultural; and (6) Workforce Education and Training.<sup>4</sup>

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<sup>1</sup> D.18-05-041, OP 38 at p. 190.

<sup>2</sup> See Application of Pacific Gas and Electric Company for Approval of 2018-2025 Rolling Portfolio Energy Efficiency Business Plan and Budget (Application (“A.”) 17-01-015) filed January 17, 2017; see also Application of Marin Clean Energy for Approval of its Energy Efficiency Business Plan (A.17-01-017) filed January 17, 2017.

<sup>3</sup> See D.18-05-041.

<sup>4</sup> See *id.*

In granting MCE's business plan, the Commission emphasized the potential for MCE and PG&E program overlap. The Commission noted, however, the difficulty in identifying program overlap because the business plans appropriately focus on sector-level strategies, not specific programmatic activities.<sup>5</sup> Therefore, to identify areas of program overlap, the Commission directed all Program Administrators ("PA") with overlapping service territories to develop an annual Joint Cooperation Memo to "summar[ize] the areas of potential overlap in their portfolios and the manner in which they will coordinate and collaborate during the business plan period."<sup>6</sup>

Submission and approval of an annual Joint Cooperation Memo is a prerequisite for consideration of MCE's and PG&E's Annual Budget Advice Letters ("ABAL").<sup>7</sup>

### **Purpose**

This AL provides Commission staff with the Joint Cooperation Memo executed by and between MCE and PG&E as required by OP 38 of D.18-05-041. The Joint Cooperation Memo is included with this AL as Attachment 1.

The Joint Cooperation Memo describes the energy efficiency programs that MCE and PG&E anticipate offering in their shared service area in Program Year 2020 pursuant to their approved business plans. The Joint Cooperation Memo provides a summary of MCE's programs and, if PG&E offers a similar program, PG&E's programs, and describes how MCE and PG&E will coordinate to inform customers of all available program offerings.

### **Conclusion**

PG&E and MCE respectfully submit the Joint Cooperation Memo pursuant to OP 38 of D.18-05-041 and request Commission approval of same.

### **Notice**

A copy of this AL is being served on the official Commission service lists for Application 17-01-013, *et al.* and Rulemaking 13-11-005.

For changes to these service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

### **Protests**

Anyone wishing to protest this advice filing may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice

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<sup>5</sup> *Id.* at p. 111.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*, OP 39 at p. 191.

filing. Protests should be mailed to:

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

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address as above).

In addition, protests and all other correspondence regarding this AL should also be sent by letter and transmitted electronically to the attention of:

Jana Kopyciok-Lande  
Senior Policy Analyst  
MARIN CLEAN ENERGY  
1125 Tamalpais Ave.  
San Rafael, CA 94901  
Phone: (415) 464-6044  
Facsimile: (415) 459-8095  
[jkopyciok-lande@mceCleanEnergy.org](mailto:jkopyciok-lande@mceCleanEnergy.org)

Alice Havenar-Daughton  
Director of Customer Programs  
MARIN CLEAN ENERGY  
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Erik Jacobson  
Director, Regulatory Relations  
c/o Megan Lawson  
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77 Beale Street, Mail Code B13U  
P.O. Box 770000  
San Francisco, California 94177  
Facsimile: (415) 973-3582  
E-mail: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

**Correspondence**

For questions, please contact Jana Kopyciok-Lande at (415) 464-6044 or by electronic mail at [jkopyciok-lande@mceCleanEnergy.org](mailto:jkopyciok-lande@mceCleanEnergy.org).

/s/ Jana Kopyciok-Lande

Jana Kopyciok-Lande  
Senior Policy Analyst  
MARIN CLEAN ENERGY

cc: Service Lists: R.13-11-005; A17-01-013, *et al.*

## Attachment 1

### MCE and PG&E Joint Cooperation Memo

Information herein describes coordination for programs with the potential to overlap currently being implemented in PG&E and MCE’s shared territory. Both PG&E and MCE are fielding bids for future programs to launch in 2020 and will continue discussions once programs are designed. These potential future programs are not included in this memo because solicitations are still in process or have yet to launch and details of possible programs resulting from those solicitations will not be finalizing at the time this memo is filed.

This attachment has five sections:

- I. Nonresidential Program Information
- II. Residential Program Information
- III. Coordination (for nonresidential and residential sectors)
- IV. MCE Programs to be launched with coordination to be revisited
- V. Double dipping prevention procedure

#### **I.A. SUMMARY OF PROGRAMS THAT OVERLAP WITH MCE COMMERCIAL PROGRAMS**

*Table 1: Nonresidential Sector - MCE and Comparable IOU Programs*

Program ID	Program Name	Sector	Budget <sup>1</sup>	Measures											
				Lighting	Appliances	HVAC	Plug Load	Refrigeration	Custom	Lighting Controls	HVAC Controls	Whole Building	Water Heaters	Other	
<b>MCE Nonresidential Resource Programs</b>															
MCE02	Commercial Upgrade Program	Commercial	\$1,185,725	X	X	X	X	X	X	X	X	X	X	X	

<sup>1</sup> PG&E’s and MCE’s budgets are based on 2019 budgets. These budgets are subject to change once the 2020 ABAL is finalized.

MCE10	Industrial	Industrial	\$690,423	X		X		X	X	X	X		X	X
MCE11	Agricultural	Agricultural	\$766,449	X		X		X	X	X	X		X	X
<b>IOU Comparable Nonresidential Resource Programs</b>														
PGE21011	Commercial Calculated Incentives	Commercial	\$8,524,651	X	X	X		X	X	X	X	X		X
PGE21012	Commercial Deemed Incentives	Commercial	\$14,077,204	X	X	X	X	X			X		X	X
PGE210143	Hospitality Program	Commercial	\$16,021,373	X		X		X	X	X	X			
PGE21015	Commercial HVAC Program	Statewide	\$13,021,318			X					X			
PGE21018	Energy Smart Grocer	Commercial	\$7,869,842	X		X		X	X		X			X
PGE211009	East Bay	Commercial	\$3,189,040	X				X						

PGE211013	Marin County	Commercial	\$868,459	X				X						
PGE211015	Napa County	Commercial	\$356,668	X				X						
PGE211029	Solano County	Commercial	\$1,136,345	X				X						
PGE21021	Industrial Calculated Incentives	Industrial	\$5,371,815	X	X	X		X	X	X	X			X
PGE21031	Agricultural Calculated Incentives	Agriculture	\$2,340,455	X	X	X		X	X	X	X			X
PGE21027	Heavy Industry Energy Efficiency Program	Industrial	\$8,726,194	X	X	X		X	X	X	X			X
PGE21030	Strategic Management (SEM Food Processing & Manufacturing)	Industrial	\$2,226,256											X
PGE210212	Industrail Compressed Air System Efficiency (ICASE)	Industrial	\$520,951						X	X	X			X
PGE21039	Comprehensive Food Process Audit & Resource Efficiency	Agricultural	\$3,246,023	X	X	X		X	X	X	X			X

PGE210311	Process Wastewater Treatment EM Pgm for Ag Food Processing	Agricultural	\$421,157						X					X
PGE21034	Advanced Pumping Efficiency Program (APEP)	Agricultural	\$2,850,602						X					X
PGE21032	Deemed Downstream Incentives	Agricultural	\$3,284,169	X	X	X	X	X			X		X	X
PGE21022	Deemed Downstream Incentives	Industrial	\$244,743	X	X	X	X	X			X		X	X
PGE210134	Water Infrastructure and System Efficiency	Industrial	\$2,387,317						X					X
PGE210312	Dairy & Winery Industry Efficiency Solutions Program	Agricultural	\$2,289,369	X	X	X		X	X	X	X			X
PGE21026	Energy Efficiency Services for Oil Production	Industrial	\$1,871,443	X	X	X		X	X	X	X			X
PGE210210	Industrial Recommissioning Program	Industrial	\$2,874,548	X	X	X		X	X	X	X			X

## **I.B. PROGRAM SUMMARIES AND COORDINATION OF MCE AND COMPARABLE IOU COMMERCIAL PROGRAMS**

This section includes a summary of the programs listed in the table above and the planned MCE/PG&E coordination.

### **a) MCE Program(s)**

#### **MCE02, MCE Commercial Upgrade Program**

- The program targets Commercial customers in MCE's service area. Its primary objectives are to facilitate the uptake of high quality energy efficiency projects, and improve the technical capability, pricing and program experience of both customers and the local contractor community. The program aims to achieve these objectives through competitive bidding, design and procurement assistance, project management, and customer support. The program also aims to leverage deemed, custom and Normalized Metered Energy Consumption (NMEC) savings claims. Measures include interior and exterior LED luminaires and lamps, networked lighting controls, connected thermostats, HVAC equipment, advanced rooftop controllers, ductless heat pumps, heat pump water heaters and other measures which may apply to customers in retail, office, and other nonresidential building types.

#### **MCE10, MCE Industrial Program**

- The MCE Industrial Energy Efficiency program is a comprehensive third-party program delivering electric and gas savings for industrial customers within MCE's service area. The program will utilize Deemed, Custom, and Normalized Metered Energy Consumption (NMEC) savings analyses and claims, and host Strategic Energy Management (SEM) cohorts. Customer will benefit from a comprehensive approach to energy efficiency, combining MCE's strong customer relationships and community presence, and ongoing communication with innovative methods, data-driven outreach and rigorous technical review.

#### **MCE11, MCE Agricultural Program Program**

- The MCE Agricultural Energy Efficiency program is a comprehensive third-party program delivering electric, gas and water savings for agricultural customers within MCE's service area. The program will utilize Deemed and Custom savings analyses and claims. Customer will benefit from a comprehensive approach to energy efficiency, combining MCE's strong customer relationships and community presence, and ongoing communication with innovative methods, data-driven outreach and rigorous technical review.

### **b) Comparable IOU Program(s)**

#### **PGE21011: Commercial Calculated (Statewide)**

- PG&E implements the Statewide Commercial Calculated program for customers in its territory. The program provides financial incentives for non-residential customers to install new equipment or systems that exceed applicable code and/or industry standards in existing buildings. PG&E's Calculated program includes both customized incentives (formerly "Customized Retrofit") and Retro-commissioning (RCx) offerings. RCx represents an important element of PG&E's Energy Efficiency toolkit by reducing energy usage and optimizing the efficiency of mechanical equipment, lighting, and control systems to current standards in existing facilities. PG&E offers financial and technical assistance for customers to undertake RCx projects and implement measures that improve facility operations.

#### **PGE21012: Commercial Deemed Incentives (Statewide)**

- PG&E implements the Statewide Commercial Deemed Incentives (Deemed) program for customers in its territory. The program offers prescriptive rebates directly to customers, vendors, or distributors for the installation or sale of energy-efficient equipment. The program offers a broad array of measures across

technology segments including lighting, HVAC, food service, refrigeration, and water heating. This program is offered to all customer segments and sizes.

### **PGE210143: Hospitality**

- PG&E's Hospitality program offers a comprehensive list of Energy Efficiency measures and services to hospitality customers with annual peak demand above 100 kW or that have ten or more locations within PG&E's territory. The program offers both custom and deemed measures, and assists customers with Energy Efficiency projects from start to finish.

### **PGE21015: Commercial HVAC (Statewide)**

- PG&E implements the Statewide Commercial HVAC program for customers in its territory. The program comprises three elements that enable market transformation, direct energy savings, and demand reductions: Upstream HVAC Equipment Incentives, Commercial Quality Installation, and midstream Commercial Quality Maintenance (C-QM). This program is designed for commercial rooftop units powered by electricity from PG&E.

### **PGE21018: Energy Smart Grocer**

- The Energy Smart Grocer program provides comprehensive Energy Efficiency services for medium to large grocery stores and supermarkets with annual peak demand above 70kW and those with multi-plex refrigeration systems. The program provides comprehensive energy audits, long-term energy planning, and support for the implementation of efficiency measures.

### **PGE21021: Industrial Calculated (Statewide)**

- PG&E implements the Statewide Industrial Calculated program for customers in its territory. The program provides financial incentives for non-residential customers to install new equipment or systems that exceed applicable code and/or industry standards in existing facilities. PG&E's Calculated program includes both customized incentives (formerly "Customized Retrofit") and Retro-commissioning (RCx) offerings. RCx represents an important element of PG&E's Energy Efficiency toolkit by reducing energy usage and optimizing the efficiency of mechanical equipment, lighting, and control systems to current standards in existing facilities. PG&E offers financial and technical assistance for customers to undertake RCx projects and implement measures that improve facility operations.

### **PGE21021: Agricultural Calculated (Statewide)**

- PG&E implements the Statewide Agricultural Calculated program for customers in its territory. The program provides financial incentives for non-residential customers to install new equipment or systems that exceed applicable code and/or industry standards in existing facilities. PG&E's Calculated program includes both customized incentives (formerly "Customized Retrofit") and Retro-commissioning (RCx) offerings. RCx represents an important element of PG&E's Energy Efficiency toolkit by reducing energy usage and optimizing the efficiency of mechanical equipment, lighting, and control systems to current standards in existing facilities. PG&E offers financial and technical assistance for customers to undertake RCx projects and implement measures that improve facility operations.

### **PGE21022: Industrial Deemed Incentives (Statewide)**

- PG&E implements the Statewide Industrial Deemed Incentives (Deemed) program for customers in its territory. The program offers prescriptive rebates directly to customers, vendors, or distributors for the installation or sale of energy-efficient equipment. The program offers a broad array of measures across technology segments including lighting, HVAC, food service, refrigeration, and water heating. This program is offered to all customer segments and sizes.

### **PGE21032: Agricultural Deemed Incentives (Statewide)**

- PG&E implements the Statewide Industrial Deemed Incentives (Deemed) program for customers in its territory. The program offers prescriptive rebates directly to customers, vendors, or distributors for the

installation or sale of energy-efficient equipment. The program offers a broad array of measures across technology segments including lighting, HVAC, food service, refrigeration, and water heating. This program is offered to all customer segments and sizes.

#### **PGE21039: Comprehensive Food Process Audit & Resource Efficiency Program**

- PG&E's Comprehensive Food Process Audit & Resource Efficiency Program is a third-party program targeting PG&E customers in the food processing and post crop harvest activity industries. The program provides technical assistance and financial incentives for customers to install new equipment or systems that exceed applicable code and/or industry standards in existing buildings. As a comprehensive program, offerings include a broad range of custom and deemed energy efficiency measures including refrigeration, lighting, heat recovery, compressed air, pipe and tank insulation, and process optimization.

#### **PGE210311: Process Wastewater Treatment Energy Management Program**

- PG&E's Process Wastewater Treatment Energy Management Program is a third-party program targeting PG&E food processing customers with existing or planned onsite wastewater treatment facilities. The program provides technical assistance and financial incentives for customers to install new equipment or systems that exceed applicable code and/or industry standards. The program offers custom measures including but not limited to automating control with dissolved oxygen sensors, high efficiency pumps and aerators, and variable frequency drives on aerators, blowers, and water/wastewater pumps.

#### **PGE21034: Agricultural Pumping Efficiency Program**

- PG&E's Agricultural Pumping Efficiency Program is an educational and incentive program intended to improve overall pumping efficiency for PG&E's agricultural customers (municipal and turf/landscape customers are also eligible). The program offers technical assistance, subsidies for pump testing, and incentives for overhauls of turbine pumps that involve either or both of the pump impeller and bowl, or the pump impeller and volute casing as applicable.

#### **PGE210135: Water Infrastructure and System Efficiency**

- PG&E's Process Wastewater Treatment Energy Management Program is a third-party program targeting Water Agencies, Special Districts, and city owned water systems. The program provides technical assistance and financial incentives for customers to install new equipment or systems that exceed applicable code and/or industry standards. The program offers custom measures including but not limited to pump overhauls, variable frequency drives, storage systems, pump sequencing, and system optimization.

#### **PGE210312: Dairy and Winery Industry Efficiency Solutions**

- PG&E's Dairy and Winery Industry Efficiency Solutions program is a third-party program targeting PG&E customers in the alcohol production and milk production industries, including breweries, wineries, dairies, and goat and sheep farming operations. The program provides technical assistance and financial incentives for customers to install new equipment or systems that exceed applicable code and/or industry standards in existing buildings. Offerings include a broad range of custom and deemed energy efficiency measures including refrigeration, lighting, HVAC, controls, and process optimization.

#### **PGE21026: Energy Efficiency Services for Oil and Gas Production**

- PG&E's Energy Efficiency Services for Oil and Gas Production program is a third-party program targeting PG&E customers with oil and gas production facilities. The program provides technical assistance and financial incentives for customers to install new equipment or systems that exceed applicable code and/or industry standards in existing buildings. Offerings include a broad range of energy efficiency measures including conversion of outdated pumping systems, motor controllers, proper sizing of motors, pumps, and

premium efficient motors, variable frequency drives, water reduction technologies, and splitting water injection systems into high and low pressure.

#### **PGE21027: Heavy Industry Energy Efficiency Program**

- PG&E's Heavy Industry Energy Efficiency Program is a third-party program targeting PG&E industrial customer facilities. The program provides technical assistance and financial incentives for customers to install new equipment or systems that exceed applicable code and/or industry standards in existing buildings. Offerings include design assistance, engineering support, and financing guidance to enable customers to reduce power demand, save energy and water, improve productivity, reduce emissions and waste materials, and become more competitive.

#### **PGE210210: Industrial Recommissioning (IRCx)**

- PG&E's Industrial Recommissioning (IRCx) program is a third-party program targeting PG&E customers with industrial facilities. The program focuses on reducing the substantial energy losses that routinely occur in industrial facilities due to poorly controlled or malfunctioning equipment. Measures include optimization of compressed air systems, process systems, refrigeration systems, cooling systems, combustion systems, and heat exchanger systems.

#### **PGE210212: Industrial Compressed Air and Vacuum Optimization Program**

- PG&E's Industrial Compressed Air program is a third-party program targeting PG&E customers with industrial facilities which have installed compressed air systems above 100 horsepower. This comprehensive turnkey program pays up to 50% of the project cost for eligible measures including air compressor replacement and compressed air system optimization.

#### **PGE21030: Industrial Strategic Energy Management**

- PG&E's Industrial Strategic Energy Management program is a third-party program targeting PG&E customers with food processing or manufacturing facilities. The program is a holistic, whole facility approach that uses Normalized Meter Energy Consumption (NMEC) and dynamic baseline model to determine energy savings from all program activity at the facility, including capital projects, custom and deemed calculated retrofits, maintenance and operation, and retro-commissioning projects. The program requires a multi-year customer commitment to participation in multiple cohort-type training workshops, individual or cohort energy analysis, and Evaluation, Measurement, and Verification (EM&V) activities based on information and characteristics of the facility's specific processes.

#### **Regional SMB Programs: PGE211009-East Bay; PGE211013-Marin; PGE211015-Napa; PGE211029-Solano**

- Regional SMB programs serve small and medium business (SMB) customers with annual peak demand below 200 kW. Through this offering, SMBs benefit from a high level of technical assistance and turnkey installation of lighting, refrigeration, and HVAC control measures whereby the incentive payment is incorporated into to the project proposal. These programs are implemented by either 3<sup>rd</sup> parties or local government partnerships.

## II.A. SUMMARY OF PROGRAMS OFFERED FOR 2019 THAT OVERLAP WITH MCE RESIDENTIAL PROGRAMS

The only residential programs offered in 2020 that are currently designed and overlap are the MCE and PG&E multifamily programs. PG&E has no comparable program to the MCE single family seasonal savings program. MCE will be launching a single family pay-for-performance program in 2019 and may need to coordinate with PG&E’s existing pay-for-performance programs. Both MCE and PG&E will have residential programs that may launch in 2020 (and there may be statewide programs as well), but there is insufficient detail on possible design and therefore no ability to determine needed coordination. These expected programs launching in 2020 are listed in Section III of this attachment.

*Table 2: Residential Sector - MCE and Comparable IOU Programs*

Program ID	Program Name	Sector	Budget <sup>2</sup>	Measures										
				Lighting	Appliances	HVAC	Plug Load	Refrigeratio	Custom	Lighting Controls	HVAC Controls	Whole Building	Water Heater	Other
<b>MCE Residential Resource Programs</b>														
MCE01	Multifamily Comprehensive Program	Residential	\$1,074,957	X	X	X	X		X	X	X	X	X	
MCE03	Single Family Seasonal Savings Program	Residential	\$109,000								X			
MCE05	Multifamily Standalone Direct Install Program	Residential	\$296,971	X	X	X	X							

<sup>2</sup> PG&E’s and MCE’s budgets are based on 2019 budgets. These budgets are subject to changes once the 2020 ABAL is finalized.

MCE08	Single Family Standalone Direct Install Program	Residential	\$419,501	X	X	X	X							
<b>IOU Comparable Residential Resource Programs</b>														
PGE21003	Multifamily Upgrade Program	Residential	\$7,500,000									X		
PGE210011	Residential Energy Fitness (MIDI subprogram)	Residential	\$3,000,000	X		X	X			X	X		X	

## **II.B. PROGRAM SUMMARIES AND COORDINATION OF MCE AND COMPARABLE IOU RESIDENTIAL PROGRAMS**

### **a) MCE Program(s)**

#### **MCE01, MCE Multifamily Program**

- This program offers multifamily properties in MCE's service area with common-area and in-unit single measure rebates as well as direct install opportunities of free in-unit measures to address barriers related to equipment cost and split incentives. These offerings can be layered with other programs or used as a standalone MCE offering

#### **MCE03, MCE Seasonal Savings Program**

- This program targets Smart thermostat owners in MCE's service area. Seasonal Savings is a software algorithm that offers customers the opportunity to make their cooling and heating schedules more efficient through a series of small adjustments to scheduled temperatures over a three-week period. Customers are offered the program on their thermostat and through a phone app and must opt-in to participate. There is currently no concern of program or measure overlap because PG&E is not offering a comparable program within MCE service area.

#### **MCE05, MCE Multifamily Standalone Direct Install Program**

- The MCE Multifamily Standalone Direct Install program is a direct install third-party program that will conduct basic energy efficiency assessments, install energy efficiency measures, water saving devices and health and safety equipment as well as other turn-key solutions. The Program will serve as a customer introduction to MCE's comprehensive customer program services.

#### **MCE07, MCE Single Family Comprehensive Program**

- MCE is currently in a solicitation phase for its single family residential pay-for-performance program and there is insufficient detail on possible design.

#### **MCE08, MCE Single Family Standalone Direct Install Program**

- The MCE Multifamily Standalone Direct Install program is a direct install third-party program that will conduct basic energy efficiency assessments, install energy efficiency measures, water saving devices and health and safety equipment as well as other turn-key solutions. The Program will serve as a customer introduction to MCE's comprehensive customer program services.

### **b) Comparable IOU Program(s)**

#### **PGE 210011- Residential Energy Fitness (MIDI Subprogram)**

- The MIDI program is available to qualified renters and homeowners living in single-family homes, multifamily dwellings, and mobile homes. It is designed to help residential customers reduce their energy usage through no-cost direct install energy efficiency upgrades. The program's primary objectives are to help customers understand their energy use, reduce their energy consumption and demand, save money on their utility bills, improve their quality of life, and improve the comfort of their homes. Qualifying customers will receive an energy assessment to determine which energy efficient upgrades and services they are eligible for. After upgrades are complete, customers who opt in will receive a quarterly energy report outlining their energy usage with tips on how they can continue to save energy. Measures include LED lighting, smart thermostats, water conservation measures, HVAC services, and energy efficiency tier II power strips. Additional individual energy assessments and ongoing education/tips are provided to customers as well.

#### **PGE 21003 - Multifamily Upgrade Program (MUP)**

- The Multifamily Upgrade Program (MUP) targets Multifamily properties in PG&E’s service area. It offers per-unit incentives for multiple energy efficiency upgrades that escalate with higher energy savings. Third-party energy raters and contractors (trade allies) conduct site audits, build models to calculate project savings, and complete installations. PG&E has transitioned program delivery channels to integrate available multifamily services through a single customer service pathway referred to as the single point of contact (SPOC). The SPOC approach removes the customer burden of navigating available programs, determining eligibility, and applying to various program opportunities. SPOC provides tailored guidance for each multifamily customer. Rather than prescribing a program to a customer base, PG&E helps each customer assess needs individually to identify the best solution, or solutions, for each community or property. Through a menu that includes various complementary offerings, energy efficiency to water savings, and renewables, and previously out-of-reach assistance like benchmarking and financing, SPOC helps multifamily customers maximize project scope and energy savings by locating individualized solutions to their specific needs. These customers can use the On-Bill financing program which provides qualified PG&E customers 0% interest loans for energy efficiency retrofits; loans are repaid on PG&E bills.

### III. Coordination between MCE and PG&E

MCE and PG&E plan to coordinate across four large areas: customer choice, marketing, policy, and double-dipping prevention. Coordination is expected to occur through quarterly meetings encompassing both the commercial sector and residential sector.

Both MCE and PG&E will serve as customer facing PAs for their respective programs. MCE uses a single-point-of-contact concept that means when a customer approaches MCE, MCE will aggregate as much information as possible about other programs and opportunities so that the customer gains an introduction to many varied resources. As such, MCE will not be the only customer facing PA in their service territory, but will facilitate customers participating in their programs as well as other programs including:

- other PA programs for which they do not have a comparable offering,
- programs focusing on other resource conservation activities such as water conservation, or waste reduction
- programs focusing on health and safety improvements

Specifically, MCE and PG&E will coordinate in these areas:

- **Customer Choice:** Customers have a choice between PG&E and MCE programs. To ensure that customers understand this, both PAs will take steps to ensure information on all programs are known by those people talking with customers. Specifically, PG&E will appoint a point-person within PG&E that MCE can call for any questions regarding programs options. Additionally, PG&E will create a list of program options that the MCE SPOC can use during their customer interactions. MCE will also create a list of their program options that PG&E will share internally with their customer representatives (if relevant) and include in any third-party training so that all are familiar with MCE programs. PG&E and MCE will use their planned meetings to update these documents as needed.

Figure 1 below shows how PG&E, MCE, and BayREN plan to coordinate for the Multifamily Comprehensive program to minimize customer confusion around offerings over programs and maximize program uptake. PG&E and MCE will take a similar approach across all overlapping programs.

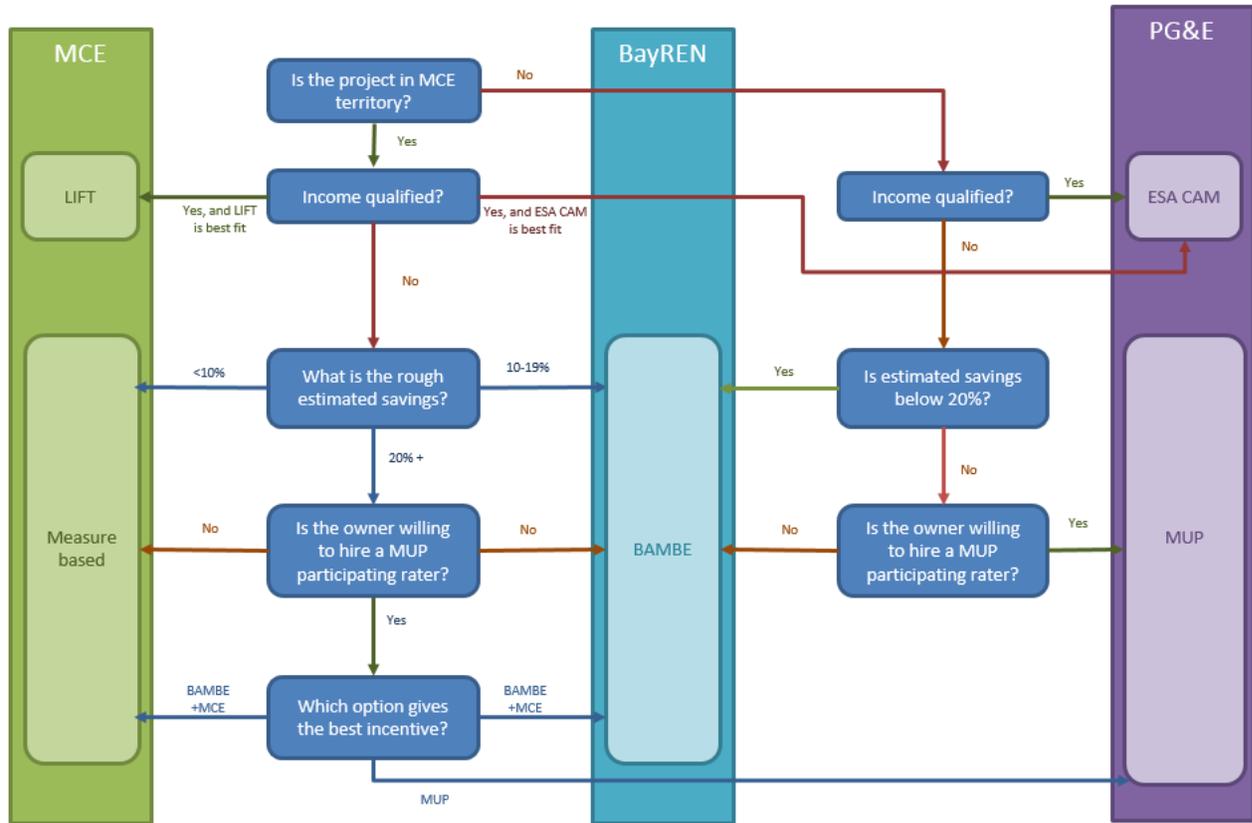


Figure 1: Multifamily Referral Tree - MCE/BayREN/PG&E

- Marketing:** In an effort to avoid customer confusion, MCE and PG&E will coordinate marketing activities by providing an overview of upcoming campaigns including scheduled timeline, targeted customer segment and regional penetration rates.
- Policy:** MCE and PG&E are aware that program policies change over time and can affect the need for coordination. They will use the regular coordination calls to check in on policy changes and how to coordinate on any relevant changes.
- Double dipping prevention:** PG&E and MCE understand the potential of customers seeking to obtain incentives for the same measures from both organizations (double-dipping). Section V of this attachment describes the protocol to prevent this from occurring.

#### IV. PROGRAMS PLANNED FOR LAUNCH – COORDINATION TO BE REVISITED

The MCE Programs listed below are in planning stages but will launch in mid 2019. Other PA programs (PG&E or statewide) may launch in 2019 as well. MCE and PG&E will revisit the need for coordination once a bidder is chosen and program design, program implementation and measure portfolios are more clearly defined. MCE will share program details with PG&E program staff at that time to determine if specific coordination efforts are needed. MCE and PG&E will include any statewide programs in their discussions even if PG&E is not the PA managing the statewide program

<b>Program ID</b>	<b>Program Name</b>	<b>Launch Year</b>
MCE05	MCE Multifamily Direct Install Standalone Program	Mid 2019
MCE07	MCE Single Family Comprehensive Program	Mid 2019
MCE08	MCE Single Family Direct Install Standalone Program	Mid 2019
MCE10	MCE Industrial Energy Efficiency Program	Mid 2019
MCE11	MCE Agricultural Energy Efficiency Program	Mid 2019
MCE16	MCE Workforce, Education & Training Program	Mid 2019

## V. PG&E and MCE Programs: Double Dipping Prevention Procedures

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It is a priority of the PG&E and MCE program teams that participants in ratepayer funded programs do not receive multiple incentives for the same installed measure. The PG&E and MCE teams propose the following procedures to prevent “double dipping” from incentive or rebate funding available from PG&E and MCE programs.

### Summary of procedures

*Proposed actions for preventing double dipping in **current** program cycle:*

#### **Timeline: Effective 8.1.2018**

1. Identify all programs which have measure or customer overlap within MCE’s service area.
2. MCE and PG&E will collaborate to ensure that customers have access to all program offerings within their service areas; regardless of the entity that generated or sourced the project lead.
3. All formal program documents (fact sheets, flyers, enrollment forms, rebate applications, etc.) from both MCE and PG&E indicate that program participants may not apply to multiple programs for the same measures.
4. Project enrollment forms will require a form field identifying the last utility incentive received, and the scope of work covered by the project.
5. Program Managers of overlapping programs will share completed project updates on a bi-monthly basis, on a project by project basis (manual spreadsheet updates until an automated process can be identified).
  - MCE’s programs will also provide support and incentives for some measures covered by statewide programs, including Upstream and Midstream programs. MCE Program Managers (PMs) will notify PG&E PMs of any project which plan to install measures also covered by Upstream/Midstream programs. PG&E will lead coordination with the relevant Upstream/Midstream program to ensure that incentives are only paid to the customer.
6. Rejected applications will be shared among relevant Program Managers (managers of overlapping programs) monthly to ensure rejected applications are not sent to other programs.
7. Contractor process
  - Participating contractors in MCE and PG&E programs will be notified of policies pertaining to double dipping.
    - Contractor enrollment forms include a form field to identify the PA programs that they expect to participate in.
    - Multiple violations of double-dipping policies may disqualify a contractor from program participation.

#### **Timeline: TBD**

8. Program managers will explore automated processes double-dipping checks. This may include:
  - PG&E potentially giving MCE access to a dashboard within Energy Insight to review projects within MCE’s service area. This could provide an automated cross-check process that may require Shared Data access agreements (TSRs and NDAs). MCE is currently also exploring developing a Salesforce based program tracking portal, and the possibility for an API connection between databases.
  - PG&E exporting projects completed within PG&E programs, to include addresses and account numbers, which can then be incorporated into MCE’s project management tool to cross-check before enrollment in an MCE program. File to be updated every 6 months.

*Proposed actions for preventing double dipping on measures that were installed in **previous** cycles:*

9. MCE and PG&E will share information on all project addresses and account numbers which received program incentives or rebates within the last five years. All new projects will be cross-checked against historical program participation records.



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: Marin Clean Energy; Pacific Gas and Electric Company (ID U39 M)

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Jana Kopyciok-Lande

Phone #: 415-464-6044

E-mail: jkopyciok-lande@mccleanenergy.org

E-mail Disposition Notice to: jkopyciok-lande@mccleanenergy.org

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

6/17/2019

Advice Letter (AL) #: MCE 36-E; PG&E 4107-G/5563-E

Tier Designation: 2

Subject of AL: Marin Clean Energy's and Pacific Gas and Electric Company's Annual Joint Cooperation Memorandum for Program Year 2020

Keywords (choose from CPUC listing): Energy Efficiency, Compliance

AL Type:  Monthly     Quarterly     Annual     One-Time     Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Decision 18-05-041, Ordering Paragraph 38

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

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

Confidential treatment requested?  Yes     No

If yes, specification of confidential information:

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

Resolution required?  Yes     No

Requested effective date: 7/17/19

No. of tariff sheets: N/A

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 proposed<sup>1</sup>: N/A

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

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

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

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

Name: Jana Kopyciok-Lande  
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Utility Name: Marin Clean Energy  
Address: 1125 Tamalpais Ave  
City: San Rafael State: California  
Telephone (xxx) xxx-xxxx: (415) 464-6044  
Facsimile (xxx) xxx-xxxx: (415) 459-8095  
Email: [jkopyciok-lande@mceCleanEnergy.org](mailto:jkopyciok-lande@mceCleanEnergy.org)

Name: Alice Havenar-Daughton  
Title: Director of Customer Programs  
Utility Name: Marin Clean Energy  
Address: 1125 Tamalpais Ave  
City: San Rafael State: California  
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Email: [ahavenar-daughton@mceCleanEnergy.org](mailto:ahavenar-daughton@mceCleanEnergy.org)

## ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

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

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	Praxair
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	Regulatory & Cogeneration Service, Inc.
	Energy Management Service	SCD Energy Solutions
Alta Power Group, LLC	Engineers and Scientists of California	
Anderson & Poole	Evaluation + Strategy for Social Innovation	SCE
	GenOn Energy, Inc.	SDG&E and SoCalGas
Atlas ReFuel	Goodin, MacBride, Squeri, Schlotz & Ritchie	
BART	Green Charge Networks	SPURR
	Green Power Institute	San Francisco Water Power and Sewer
Barkovich & Yap, Inc.	Hanna & Morton	Seattle City Light
P.C. CalCom Solar	ICF	Sempra Utilities
California Cotton Ginners & Growers Assn	International Power Technology	Southern California Edison Company
California Energy Commission	Intestate Gas Services, Inc.	Southern California Gas Company
California Public Utilities Commission	Kelly Group	Spark Energy
California State Association of Counties	Ken Bohn Consulting	Sun Light & Power
Calpine	Keyes & Fox LLP	Sunshine Design
	Leviton Manufacturing Co., Inc. Linde	Tecogen, Inc.
Cameron-Daniel, P.C.	Los Angeles County Integrated Waste Management Task Force	TerraVerde Renewable Partners
Casner, Steve	Los Angeles Dept of Water & Power	Tiger Natural Gas, Inc.
Cenergy Power	MRW & Associates	
Center for Biological Diversity	Manatt Phelps Phillips	TransCanada
City of Palo Alto	Marin Energy Authority	Troutman Sanders LLP
	McKenzie & Associates	Utility Cost Management
City of San Jose	Modesto Irrigation District	Utility Power Solutions
Clean Power Research	Morgan Stanley	Utility Specialists
Coast Economic Consulting	NLine Energy, Inc.	
Commercial Energy	NRG Solar	Verizon
County of Tehama - Department of Public Works		Water and Energy Consulting
Crossborder Energy		Wellhead Electric Company
Crown Road Energy, LLC		Western Manufactured Housing Communities Association (WMA)
Davis Wright Tremaine LLP		Yep Energy
Day Carter Murphy		
	Office of Ratepayer Advocates	
Dept of General Services	OnGrid Solar	
Don Pickett & Associates, Inc.	Pacific Gas and Electric Company	
Douglass & Liddell	Peninsula Clean Energy	