PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298

Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 4460G/6239E
As of July 28, 2021

Subject: PG&E's Annual Advanced Energy Rebuild Advice Letter in Compliance with Commission Disposition

Division Assigned: Energy

Date Filed: 06-30-2021

Date to Calendar: 07-02-2021

Authorizing Documents: None

Disposition:	**Accepted**
Effective Date:	**06-30-2021**

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo
415-973-4587
PGETariffs@pge.com

STATE OF CALIFORNIA **GAVIN NEWSOM,** *Governor*

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298

To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

Advice Letter Number
Name of Filer
CPUC Corporate ID number of Filer
Subject of Filing
Date Filed
Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
Effective Date of Filing
Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

Pacific Gas and Electric Company

Sidney Bob Dietz II
Director
Regulatory Relations

Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Fax: 415-973-3582

June 30, 2021

Advice 4460-G/6239-E
(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: **PG&E's Annual Advanced Energy Rebuild Advice Letter in Compliance with Commission Disposition**

Purpose

Pacific Gas and Electric Company (PG&E) hereby submits the third annual Advice Letter in compliance with the California Public Utilities Commission (Commission or CPUC) disposition approving the provisions of Advice 3928-G/5219-E and Supplemental Advice 3928-G/5219-E-A, which allow PG&E to offer increased incentives and program enhancements for structures destroyed by wildfires in 2017 and 2018 that will be rebuilt under 2016 and 2019 Title 24 building code. This offering is known as Advanced Energy Rebuild (AER).

Background

On April 27, 2018, the Commission approved the following requests included in PG&E Advice 3928-G/5219-E "Request for Energy Efficiency Program Enhancements to Assist October 2017 Wildfire Impacted Customers" and Supplemental Advice 3928-G-A/5219-E-A:

1. Double residential new construction incentives and increase technical support.
2. Increase non-residential new construction incentive cap and design assistance.
3. Allow the California Advanced Homes Program (CAHP) to apply to in-law units.
4. Evaluate program enhancements every two years.

The enhanced program offerings, known as Advanced Energy Rebuild (AER), were made available to serve customers with destroyed homes or businesses in the eight counties impacted by the October 2017 wildfires. On March 19, 2019, the Commission approved PG&E Advice 4068-G/5479-E, which expanded the offering to customers impacted by the Camp and Carr fires of 2018. On January 13, 2020, the Commission approved PG&E Advice 4119-G/5588-E and Advice 4194-G/5719-E, which extended AER program eligibility to customers rebuilding to 2019 Title 24 Code.

Per Commission direction, Supplemental Advice 3928-G-A/5219-E-A also included an Evaluation, Measurement, and Verification (EM&V) plan stipulating that PG&E would conduct annual reporting of program uptake. This third annual Advice Letter meets this requirement, and provides an annual report detailing program progress, uptake, and lessons learned during implementation as **Attachment A**. The data and narrative in Attachment A cover program activity through March 2021.

Due to the anticipated launch of the Wildfire and Natural Disaster Resiliency Rebuild (WNDRR) program[1], which will be managed through the Building Decarbonization Proceeding (R.19-01-011), the AER program closed to new applications in December 2020, and is expected to complete projects already in the program pipeline by the end of 2021. PG&E will submit a fourth and final annual Advice Letter in 2022 to document the details of all projects completed after March 2021 and will include a review of overall performance and lessons learned over the life of the AER offering.

Protests

*****Due to the COVID-19 pandemic, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com*****

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than July 20, 2021, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to via both E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

[1] As outlined in the R.19-01-011 Phase II Staff Proposal (DRAFT), filed August 25, 2020.

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

Facsimile: (415) 973-3582
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, telephone number, postal address, and (where appropriate) 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 5.1, this advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice letter submittal become effective upon submittal on June 30, 2021.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail 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

Attachments:
Attachment A – Annual Program Uptake Summary Memo

cc: Service List R.13-11-005

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 (ID U39E)

Utility type:
- [x] ELC
- [x] GAS
- [ ] WATER
- [ ] PLC
- [ ] HEAT

Contact Person: Kimberly Loo
Phone #: (415)973-4587
E-mail: PGETariffs@pge.com
E-mail Disposition Notice to: KELM@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) #: 4460-G/6239-E

Tier Designation: 1

Subject of AL: PG&E's Annual Advanced Energy Rebuild Advice Letter in Compliance with Commission Disposition

Keywords (choose from CPUC listing): Compliance

AL Type: [ ] Monthly [ ] Quarterly [x] Annual [ ] One-Time [ ] Other:

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

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

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

Confidential treatment requested? [ ] Yes [x] 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 [x] No

Requested effective date: 6/30/21

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 proposed[1]: N/A

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

[1] Discuss in AL if more space is needed.

Clear Form

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	Name: Sidney Bob Dietz II, c/o Megan Lawson Title: Director, Regulatory Relations Utility Name: Pacific Gas and Electric Company Address: 77 Beale Street, Mail Code B13U City: San Francisco, CA 94177 State: California Zip: 94177 Telephone (xxx) xxx-xxxx: (415)973-2093 Facsimile (xxx) xxx-xxxx: (415)973-3582 Email: PGETariffs@pge.com
	Name: Title: Utility Name: Address: City: State: District of Columbia Zip: Telephone (xxx) xxx-xxxx: Facsimile (xxx) xxx-xxxx: Email:

Clear Form

Advice 4460-G/6239-E
June 30, 2021

Attachment A

Annual Program Uptake Summary Memo

10680 White Rock Road, Suite 100
Rancho Cordova, CA 95670

916.844.0146 PHONE

April 10, 2021

MEMORANDUM

To: Conrad Asper (Pacific Gas and Electric Company)

From: Nic Dunfee, Parul Gulati, Allison Wittwer (TRC)

Re: Advanced Energy Rebuild – Annual Program Uptake Summary Memo

ADVANCED ENERGY REBUILD OVERVIEW

Background

In response to the Northern California wildfires in the fall of 2017 and 2018, Pacific Gas and Electric Company (PG&E) launched the Advanced Energy Rebuild (AER) program in May 2018, in conjunction with Sonoma Clean Power (SCP), the Bay Area Air Quality Management District (BAAQMD), MCE, and TRC, with TRC as the program implementer. PG&E and SCP extended the enrollment period for AER through 2020[1]. Under this program, TRC is responsible for design assistance, technical review of all projects, processing incentives, reporting and management of customer communications and marketing.

The deadline to apply for the program was November 15, 2020. Enrolled projects must complete construction and verification processes by November 15, 2021 in order for TRC to issue the incentive payment by the program end date of December 31, 2021. AER offered incentives for both manufactured homes and homes permitted under the 2016 and 2019 Title 24 energy code as well as both *all-electric homes* and *advanced energy homes* (dual fuel). Customers could choose from the following pathways to demonstrate eligibility for the incentives:

- **2016 Code Site-built Homes, Flexible Performance Path**: Energy model should demonstrate a 20% improvement in time dependent valuation of energy, as shown on the compliance form document generated by a California Energy Commission (CEC)-approved 2016 Title 24 compliance software
- **2016 Code Site-built Homes, Simple Menu-based Path:** Incorporate a list of measures, as described in the program handbook[2], to qualify and submit an energy model using a CEC-approved 2016 Title 24 compliance software to demonstrate them
- **2019 Code Site-built Homes, Flexible Performance Path**: Energy model should demonstrate an Efficiency Delta Energy Design Rating (EDR)[3] of 1.0 or higher in time dependent valuation of energy, as shown on the compliance form document generated by a CEC-approved 2019 Title 24 compliance software
- **Manufactured Homes, ENERGY STAR Certified Path:** Build the home to comply with the ENERGY STAR Version 2 or higher certification to qualify

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[1] PG&E Advice Letter 4119-G/5588-E

[2] AER Program Handbook (2016 code): https://www.cahp-pge.com/AER_TRC_Handbook_2019.pdf

[3] Delta EDR is a whole home efficiency metric that considers all aspects of the building, both regulated as well as non-regulated, and includes energy-use impacts from insulation, heating, cooling, water heating, appliances, lighting etc. The Delta EDR is calculated by subtracting the Efficiency EDR of Proposed Design score from the Efficiency EDR of Standard Design score.

The 2016 code Flexible Performance and Simple Menu-based paths for site-built homes offered an incentive amount of $12,500 for qualifying all-electric homes, $7,500 for qualifying advanced energy homes, and an optional $5,000 incentive for the addition of solar photovoltaics (PV) and battery storage. Projects permitted under the 2016 Title 24 code received 50% of their incentive upfront, and the remaining amount following verification, after the project completes construction. The 2019 code Flexible Performance path for site-built homes offered a qualifying advanced energy home or all-electric home an incentive amount of $2,500 or $12,500 respectively and an optional $1,000 incentive for battery storage. The ENERGY STAR Certified path offered qualifying manufactured homes an incentive amount of $3,000. All-electric manufactured homes could earn up to $4,000 more in incentives through bonus options for battery storage, North West Energy-Efficient Manufactured Housing (NEEM)+[4] certification, heat pumps, and induction cooking. Dual-fuel manufactured homes can earn up to $2,000 more in incentives through bonus options for battery storage and NEEM+ certification. The program also offered a 50% reduced incentive for qualifying accessory dwelling units (ADUs)[5] with an option to receive a battery storage incentive for all pathways. AER pays incentives for all 2019 code and manufactured home projects after program staff verify completion of documentation for the completed home.

Program Metrics

The following section summarizes program metrics from program launch on May 1, 2018 through March 31, 2021.

Program Pipeline

- TRC has enrolled 574 eligible projects for a total of 720 dwelling units. The units consist of the following:
    - 2016 Title 24 code: 380 single family residences, 34 ADUs, and 2 multifamily complexes with 120 total units
    - 2019 Title 24 code: 20 single family residences, and 2 ADUs
    - Manufactured homes: 163 single family units and 1 ADU
- Of the 720 dwelling units, the following have received their full incentive:
    - 302 (42%) units under the 2016 Title 24 code
    - 2 (0.03%) units under the 2019 Title 24 code
    - 51 (7%) manufactured homes

Enrollment Data

- 547 of the 556 total enrolled site-built units (98%) have taken the Flexible Performance Path, while 9 of 556 enrolled site-built projects (2%) have taken the Simple Menu-based Path. The 164 manufactured homes are not included in the total number as they were only required to meet the ENERGY STAR Certified pathway.
- Of the 720 enrolled units, 170 (24%) built an all-electric home, 550 (77%) built a dual fuel home.

[4] NEEM Website: https://www.neemhomes.com/

[5] Accessory Dwelling Unit, also known as a casita or granny unit, is a small permanent home that may be established in addition to the main dwelling on a parcel zoned for residential use. ADUs may be attached or detached from the main dwelling.

Overall Program Savings and Measures

- Enrolled projects have secured projected savings of 7,866.11 in kWh and 97,920.98 in therms (16.19 kWh and 195.06 therms per home on average). These numbers include savings for 41 of the total manufactured homes enrolled in the program. TRC is working with PG&E to develop a deemed savings approach to claim savings for the remaining homes that pursued the MH pathway.
- The current program average for kW savings is 0.00 kW. Enrolled projects demonstrate an average delta EDR of 4.66, with projects ranging between -1 to 18 delta EDRs. Many of the all-electric projects enrolled demonstrate negative savings. Please note that savings do not include generation from installed solar PV.
- Enrolled projects are demonstrating an average of 24.7% of energy efficiency improvement above 2016 Title 24 code, with project efficiency improvements ranging from 0.07 to 53.3% above 2016 Title 24 code requirements.
- Enrolled projects are demonstrating an average of 7.9% of energy efficiency improvement above 2019 Title 24 code, with project efficiency improvements ranging from 3.2 to 29.3% above 2019 Title 24 code requirements.
- 128 of the enrolled projects pursued the solar PV and battery storage bonus, totaling an average PV system size of 7.27 kW and an average battery system size of 14.05 kWh. 142 projects installed solar PV but did not install battery storage.
- Of the enrolled projects, 195 installed heat pump water heating and 250 installed heat pump space heating.

All-Electric Program Savings

- 170 out of 720 (24%) of the total enrolled units were all-electric. On average, these projects achieved 5.1 delta EDR (all projects ranging from 0 to 18) and 24.9% above 2016 and 2019 Title 24 code (all projects ranging from 3.2 to 53.3% above code).
- Since the energy modeling software does not have an all-electric baseline, such projects yielded a total projected negative savings of 35476.65 kWh and positive 8.75 kW savings. The software reported 14,759.93 unused therms for these projects.

Marketing and Outreach Summary

The AER program team launched an online *Contact Us* form through the AER website[6] in April of 2019. Between April 2019 and December 2020 when the program closed enrollment, the team fielded 426 total inquiries, as noted below:

- 122 from the *Contact Us* form
- 123 from the PG&E Customer Relations team
- 119 inquiries to TRC directly

[6] AER Website: https://cahp-pge.com/advanced-energy-rebuild/

- 62 leads from the Northern Rural Training and Employment Consortium (NoRTEC) Energy Watch (hereinafter referred to as Energy Watch) through outreach at events and meetings in the Butte County area

Outreach Methods

SCP's marketing efforts for 2016 Title 24 code projects covered a wide range of channels including direct mail, social media, posting notices at city and county permitting offices, speaking with city and county staff members who could in turn educate homeowners, and attending public events where SCP staff could speak directly with homeowners. To reach homeowners who had left the area or otherwise could not attend events like these, the AER team explained the program in multiple live online webinars, recordings of which are viewable from a link on the SCP, AER, and Energy Watch websites.

PG&E, TRC, and Energy Watch conducted marketing and outreach for projects in Butte County. Energy Watch attended local events and meetings to share program information with members of the Butte County community and to educate them about energy efficiency. As mentioned previously, the program team followed up with customer leads procured from the PG&E Customer Relations team and the *Contact Us* form on the AER program website.

The manufactured homes program pathway launched shortly before California mandated the implementation of safety regulations due to the COVID-19 pandemic. The AER team had to adapt to these restrictions and continue to spread the word about the manufactured home pathway to a demographic that is typically more challenging to reach through online channels. Retailers had agreed to post AER program flyers in their offices for customers to see when shopping for their manufactured home. However, as retailers transitioned from in-person to phone meetings, customers did not have easy access to flyers about additional resources such as AER. The AER team built relationships with retailers who were willing to educate their customers on the AER program offering and contacted customers by reviewing permit data.

AER program staff encouraged customers in the outreach pipeline to apply for the 2020 program before the application deadline on November 15, 2020.

Program Collateral and Resources

The AER team developed resources for 2016 and 2019 Title 24 code and manufactured homes targeting rebuild stakeholders such as homeowners, certified energy analysts (CEA), contractors, HERS raters, manufacturers and retailers. In 2020, the team updated pre-existing resources, as needed, and created additional case studies to highlight manufactured home projects. To see a full list of resources available to AER participants, please view the program's resources webpage[7].

Lessons Learned

Outreach and Marketing

To successfully and efficiently support homeowners to enroll in AER, the program attempted to contact homeowners during the design phase and before the building permit stage of their rebuild. The team had to be sensitive to the fact that people were grieving, and first needed to clear their lots of fire-damaged debris, while also

[7] AER Resources Webpage: https://cahp-pge.com/advanced-energy-rebuild/aer-resources/

dealing with their insurance companies. As a result, AER drove marketing efforts through local, boots-on-the-ground presence and channels, including direct mail, radio ads, social media, local print media, functioning county permitting offices, public events where staff could speak with homeowners, and online webinars. Despite the various outreach efforts, many of the homeowners the program interacted with were past the design and permitting stage. While most were still able to update their design and enroll in the program, it was not feasible for some to make design changes when they learned about the AER program.

Implementing a program that primarily works with homeowners rather than production home builders required a hands-on project support approach. The program team learned to be prepared to offer support to these customers during every part of the program process, from recruitment to incentive payment. One benefit of this approach was that it allowed the program to interact directly with homeowners, opening a unique opportunity for direct marketing and education around energy efficiency and carbon reduction.

TRC worked with PG&E and Energy Watch to assist and support customers to learn about and apply for the AER program. Energy Watch provided a local team in Butte county that was responsible for attending and securing industry events and sponsorships, organizing and participating in homeowner gatherings, and other in-person activities. Due to COVID-19 safety restrictions, and the hard-to-reach nature of the areas affected by the Camp and Carr wildfires, the program faced reduced capacity and feasibility to conduct outreach efforts.

Despite program efforts to recruit and educate CEAs and HERS raters, the program fell short of engaging the expected number of consultants to help homeowners. To encourage local participation, the program sponsored online certification courses, with SCP covering the cost to take the exam. This training increased the number of qualified CEAs in the community, but did not meet local need, so the program team worked with CEAs to develop preliminary models and then worked with the homeowner to determine a scope of work to help qualify projects for the program.

Manufactured Homes

Customers in the manufactured home demographic posed a unique challenge as many of these homeowners do not have access to computers or internet. To reach these customers, the primary marketing and outreach channel was through manufactured home retailers and program team members reviewing permit data to reach out via phone.

When the manufactured home program pathway launched, program eligibility was based on the soon-to-be updated ENERGY STAR Version 2 requirements. Homeowners and retailers are not typically aware of what ENERGY STAR version their factories build to. Therefore, during the period between manufactured home pathway launch and mandate of ENERGY STAR Version 2, the AER team contacted west coast factories to confirm which ones were already building to program requirements. From this research, the team developed a list for homeowners to reference when selecting their retailer and factory. TRC found that 19%[8] of the new manufactured homes in California in 2020 were ENERGY STAR certified compared to an average of only 4%[9] between 2017-2019.

COVID-19

The COVID-19 pandemic created challenges in the supply chain for both site-built and manufactured homes. Due to shelter-in-place and stay-at-home orders, many factories and manufacturers of various construction materials had

[8 & 9] Statistics received from Systems Building Research Alliance (SBRA). SBRA is the research arm of factory built housing industry in California to temporarily close. The halt in production caused significant construction delays for homeowners participating in the program.

Another major challenge that resulted from the pandemic was the lack of in-person events due to COVID-19 safety restrictions. Word-of-mouth became the primary channel for customer marketing and education in 2020. The program launched the manufactured homes pathway during this time. As mentioned above, many of the manufactured home customers do not access the internet and could only communicate by phone. Due to the inability to provide program resources in-person through retailer and home owner meetings, the program relied on manufactured home retailers to verbally notify their customers of the program opportunity. This approach placed more burden on retailers' time; however, it proved successful as the program has enrolled a total of 164 manufactured homes in 2020.

Electrification

Customer preference for gas appliances presents a sizable barrier for the adoption of all-electric homes. Few customers are ready to give up gas service. The AER program addressed this by requiring any participating dual-fuel home to prewire to accommodate future installations of all-electric equipment, such as HVAC, water heating, cooking, and laundry. Program staff was not as successful with pushing customers to go all-electric as originally anticipated. The staff see a great need for more education on electrification benefits as a key factor in motivating greater all-electric adoption.

Implementation

The program combined funding from PG&E, SCP, and BAAQMD to offer a single program. PG&E programs are subject to California's Public Utilities Commission requirements which, at the time, limited the utility's ability to promote fuel-switching activities. Because SCP and BAAQMD are not under these same regulations, their funding options did not have the same limitations, and these entities could promote all-electric homes. Through TRC, the entities were able to implement a program that appeared as one seamless program to participants but is in fact multiple programs running in the background. PG&E's funding supported whole home energy performance, per regulations, while SCP and BAAQMD funded electrification and GHG reductions.

There were a handful of cases where unforeseen circumstances such as project delays, escalating building material costs, increasing contractor fees, COVID-19 delays, etc. occurred. In one such instance, a participant decided to sell their property instead of completing construction on their rebuild site. Such situations, though rare, demonstrate the challenges that face a rebuild program (and its participants) that spans across large, diverse territories. Participants have suffered much loss, and though the implementation of a rebuild program needs to abide by a set of program rules, there is a need to have flexibility and to have the ability to consider situations on a case-by-case basis.

An early implementation challenge involved determining how to work within the regulations surrounding the funding sources. To address this, TRC developed project processing and review protocol that would determine the portion of incentives that each entity would contribute. To manage joint funding arrangements, with varied funding allocated by each entity involved based upon the efficiency measures, fuel source, program pathway, and selected solar and battery storage options, TRC established an escrow account. SCP pre-funded the account and TRC manages it, tracking measures and payments as part of monthly reporting to inform invoices for each entity's share of incentives and reimbursement into the escrow account accordingly. The escrow account also helped facilitate the program's ability to provide 2016 code site-built customers with 50% of their anticipated incentive at the time of program application approval. For this to work smoothly, TRC monitored the available funding to ensure there were sufficient reserves to pay the upfront incentives.

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.
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
Cenergy Power
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

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

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz & Ritchie
Green Power Institute
Hanna & Morton
ICF
IGS Energy
International Power Technology
Intestate Gas Services, Inc.
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
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

Office of Ratepayer Advocates
OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.
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
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