September 4, 2018

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



MCE Advice Letter 33-E

Re: Marin Clean Energy's 2019 Energy Efficiency Annual Budget Advice Letter

Pursuant to Decision ("D.") 18-05-041, *Decision Addressing Energy Efficiency Business Plans*, Ordering Paragraphs ("OP") 40 and 41, Marin Clean Energy ("MCE") submits its Annual Budget Advice Letter ("ABAL") for Program Year 2019 as MCE Advice Letter ("AL") 33-E.¹

<u>Tier Designation</u>: This AL has a Tier 2 designation pursuant General Order ("G.O.") 96-B, Energy Industry Rule 5.2 and D.18-05-041.

Effective Date: Pursuant to G.O. 96-B, MCE requests that this Tier 2 AL become effective on October 4, 2018, which is 30 calendar days from the date of this filing.

Purpose

The purpose of this advice filing is to request MCE's energy efficiency budget for Program Year 2019. This AL complies with D.18-05-041, which requires MCE to file an ABAL by September 4, 2018. The ABAL provides information about MCE's approved energy efficiency portfolio, including (1) cost effectiveness; (2) budgets; (3) energy savings; and (4) portfolio changes.

Background

MCE has administered energy efficiency funds under California Public Utilities Code ("Code") Section 381.1(a)-(d) since 2013.² The California Public Utilities Commission ("Commission") originally restricted MCE's energy efficiency programs to serving gaps in Investor Owned Utility ("IOU") programs and hard to reach markets.³ At the time, the Commission acknowledged that these restrictions may cause MCE's portfolio to fail the Total Resource Cost ("TRC") test and thus did not initially impose a minimum cost effectiveness requirement on MCE.⁴ In 2014, however,

¹ D.18-05-041, OP 40, 41 at p. 191.

² To date, MCE is the only community choice aggregator ("CCA") to have requested energy efficiency funding under Code Section 381.1(a)-(d).

³ D.12-11-015 at pp.45-6.

⁴ D.12-11-015 at p. 46.

the Commission lifted the restrictions and imposed the same cost effectiveness requirements on CCAs as IOUs.⁵

Program Administrators ("PA") were invited to submit business plans in 2017. On January 17, 2017, MCE filed a Business Plan with the Commission that requested authorization to expand MCE's energy efficiency portfolio to include additional sectors and programmatic offerings.⁶ MCE proposed to offer programs in the following sectors: (1) Residential; (2) Commercial; (3) Industrial; (4) Agricultural; and (5) Workforce Education and Training. On June 5, 2018, the Commission approved MCE's Business Plan.⁷

Cost Effectiveness

Decision 18-05-041 provided guidance to Commission staff on how to evaluate PAs' ABALs, which included guidance on portfolio cost effectiveness.⁸ For Program Years 2019-2022, PAs' portfolios must meet a forecasted TRC at or above 1.0. For Program Years 2023-2025, PAs' portfolios must meet a forecasted TRC at or above 1.25.

In the event a PA does not meet a TRC of 1.25 on a forecast basis for Program Years 2019-2022, ABALs must contain additional discussion about how the PA intends to meet or exceed a 1.0 TRC on an evaluated basis. MCE's portfolio TRC and program administrator cost ratio ("PAC") for 2019 are provided below.

Portfolio TRC and PAC for 2019											
TRC	1.04										
PAC	1.18										

MCE identified a set of factors that resulted in an *ex ante* TRC below 1.25 in 2019. At the portfolio level, MCE's customer programs are weighted heavily towards residential and small commercial offerings. The program portfolio lacks some high TRC program types (e.g. codes & standards, midstream, and upstream) that can help to lift a portfolio's overall TRC. MCE must also take a conservative approach to forecasting new programs and their expected costs due to uncertainties inherent in program development and running program solicitations. In the near term, MCE expects higher than usual administrative costs in rolling out new programs in 2019, the first year for most programs.

Furthermore, existing programs are in a state of transition, with changing measure portfolios, incentive rates, and implementation contracts. MCE is adjusting programs to reflect new savings values and market conditions. MCE has an interest in leveraging new savings methodologies and

⁵ D.14-01-033 at p. 14; *see also* D.14-10-046 at p. 120.

⁶ See Application of Marin Clean Energy for Approval of its Energy Efficiency Business Plan (Application ("A.") 17-01-017) filed January 17, 2017.

⁷ D.18-05-041, OP 33 at p. 189.

⁸ D.18-05-041 at pp. 132-37.

interventions within normalized metered energy consumption ("NMEC") programs and behavioral programs, but there is limited information on how to best forecast their impacts and cost-effectiveness. Within MCE's more traditional program models, current forecasting is rooted in replace on burnout ("ROB") measures, whereas programs are expected to deliver customized, early retirement projects as well.

Finally, market conditions have decreased the cost effectiveness of some core elements in MCE's programs. The lighting dispositions from early 2018 have impacted the cost effectiveness and inclusion of some key measures that deliver savings at reasonable costs to the customer, and there are high costs associated with bringing some existing buildings to above code performance.

MCE is committed to meeting the evaluated 1.0 TRC through smart, agile program design and deployment. A combination of factors and MCE initiatives will increase savings and lower costs in 2019:

- Expanded service area provides a larger population of projects
- Expanded customer groups within sectors (e.g. small commercial expanding to all commercial customers)
- Multilayered and collaborative approach to marketing and outreach with implementers to reach a wider audience
- Deployment of a customer-facing project assessment and procurement platform
- Layering offerings (energy efficiency and beyond) and funding streams to facilitate participation and reduce overall project costs
- Implementing a competitive bidding process for program implementation
- Engaging community partners to create access to MCE programs for all communities
- Use of performance-based implementation contracts
- Deploying measure cost savings strategies within existing programs
 - Increasing transparency and competition among installation contractors
 - Testing benefits of a Group Purchasing Organization
- Leveraging meter data and customized projects

MCE's individual programs will vary in their cost effectiveness. Some programs will not meet a 1.0 TRC while others will exceed it. MCE's Multifamily and Single Family programs are unlikely to exceed a 1.0 TRC, however these programs are critical to adequately serve MCE's service area (80% residential customers). For example, MCE's Multifamily Comprehensive Program serves all property types without minimum savings requirements. Without this program, a number of the most under-represented properties would not have access to energy efficiency offerings. MCE does not anticipate this program will become cost effective in the foreseeable future. MCE intends to balance the residential and other programs to ensure comprehensive offerings for customers while maintaining a cost-effective portfolio. MCE is also taking steps to improve the TRC for individual programs:

- MCE will solicit bids for the Single Family program and will consider cost-effectiveness impacts of the proposed program design and implementation strategies.
- MCE aims to use NMEC-based program designs as much as possible within the residential sector. MCE anticipates that NMEC programs will support an increase in claimed savings,

lower administrative costs and lower measure costs through competitive bidding and allowing the market to identify optimal savings strategies. This may have a positive effect on TRC.

- MCE will deploy a web-based application system and project development platform, allowing customers to proceed toward project implementation based on automated contractor bidding and approval of specifications, while reducing administrative burdens on the programs.
- MCE's residential single measure and standalone direct install programs will be run by the same implementer to realize efficiencies and reduce overall program costs.
- MCE will evaluate programs on an ongoing basis to assess the need for changes in program design and implementation.

MCE has also taken steps to improve the cost effectiveness in other areas of its portfolio. MCE has evaluated its commercial measure mix and removed non-cost-effective measures, which has increased the overall cost-effectiveness of the sector. The commercial program will also explore ways to increase competition among contractors as a strategy for reducing measure costs. MCE reduced its own overhead and administrative costs across the portfolio in order to increase cost effectiveness. MCE worked with consultants to revise measure costs to reflect actual costs in the market. MCE is confident it will achieve at least the minimum 1.0 TRC on an evaluated basis for 2019.

Budgets

The Commission approved funding levels for MCE for Program Years 2018-2025 for each of MCE's proposed sectors.⁹ The budget includes allocations for Evaluation Measurement and Verification ("EM&V").¹⁰ The Commission approved a total multiyear budget for MCE of \$85,736,000 (2018-2025). For Program Years 2018 and 2019, the Commission approved an annual budget of \$8,532,000. Although, the Commission approved annual and multiyear budgets, the Commission directed PAs to use the ABAL as an opportunity to adjust their annual budgets "to reflect the 2018-2030 goals adopted in Decision 17-08-025 and the interim greenhouse gas adder adopted in Decision 17-08-022 and other relevant factors to provide a more accurate forecast of expected annual funding levels."¹¹ The revisions, however, "must not exceed the overall funding amount" authorized in D.18-05-041, which caps PAs' total spending for the period 2018-2025.¹² MCE provides the revised portfolio and sector budgets for the business plan period below.

⁹ D.18-05-041 at p. 112.

¹⁰ D.18-05-041 at p. 112.

¹¹ D.18-05-041, OP 43 at pp. 191-92.

¹² D.18-05-041, OP 43 at pp. 191-92.

MCE Forecast 2019 Budget and Savings (Net)													
Sector	Program Year	kWh	kW	therms									
	Budget			(MM)									
Residential	\$3,865,965	2,531,902	233	0.27									
Commercial	\$1,185,725	1,967,331	358	0.03									
Industrial	\$690,423	556,588	41	0.07									
Agriculture	\$766,449	796,656	64	0.03									
Emerging Tech	\$0	na	na	na									
Public	\$0	na	na	na									
Codes and Standards	\$0	na	na	na									
WE&T	\$160,000	na	na	na									
Finance	\$0	na	na	na									
OBF Loan Pool	\$0	na	na	na									
Subtotal	\$6,668,561	5,852,477	696	0.40									
PA EM&V	\$111,143	/											
Total PA PY Spending Budget ¹	\$6,779,704												
Uncommitted and Unspent	\$0												
Carryover balance ²		1											
Total PA PY Budget Recovery	\$6,779,704												
Request ³	/												
Authorized PY Budget Cap	\$8,532,000												
(D.18-05-041)													

Annual Rolli	ing Portfolio B	udget Forecast -	True-up		
Sector	2018	2019	2020	2021	2022
Residential	\$935,935	\$3,865,965	\$7,078,017	\$7,078,017	\$6,170,017
Commercial	\$838,745	\$1,185,725	\$3,292,922	\$3,292,922	\$2,934,922
Industrial	0	\$690,423	\$1,283,596	\$1,283,596	\$1,269,596
Agriculture	0	\$766,449	\$1,253,259	\$1,253,259	\$1,181,259
Emerging	0	0	0	0	0
Tech					
Public	0	0	0	0	0
Codes and	0	0	0	0	0
Standards					
WE&T	0	\$160,000	\$346,667	\$346,667	\$346,667
Finance	0	0	0	0	0
OBF Loan	0	0	0	0	0
Pool					
Subtotal	\$1,774,680	\$6,668,561	\$13,254,460	\$13,254,460	\$11,902,460
EM&V ¹³	\$30,029	\$111,143	\$211,005	\$211,005	\$189,405
Total	\$1,804,709	\$6,779,704	\$13,465,465	\$13,465,465	\$12,091,865
Portfolio					
Program			/		
Year PA					
Budget					
Total	\$8,532,000	\$8,532,000	\$12,404,000	\$12,404,000	\$10,998,000
Authorized		/			
Portfolio					
PY Budget					
Сар					
Forecast	0.58	1.04	1.15	1.15	1.25
Portfolio					
PY TRC					
Forecast	0.64	1.18	1.32	1.32	1.44
Portfolio					
PY PAC					

¹³ EM&V budget includes only the program administrator portion (40%) and excludes the Commission staff portion (60%).

Annual Roll	Annual Rolling Portfolio Budget Forecast - True-up (continued)													
Sector	2023	2024	2025	Total										
Residential	\$6,170,017	\$6,170,017	\$5,660,017	\$43,128,000										
Commercial	\$2,934,922	\$2,934,922	\$3,251,922	\$20,667,000										
Industrial	\$1,269,596	\$1,269,596	\$1,260,596	\$8,327,000										
Agriculture	\$1,181,259	\$1,181,259	\$1,260,259	\$8,077,000										
Emerging	0	0	0	0										
Tech														
Public	0	0	0	0										
Codes and	0	0	0	0										
Standards														
WE&T	\$346,667	\$346,667	\$346,667	\$2,240,000										
Finance	0	0	0	0										
OBF Loan	0	0	0	0										
Pool				/										
Subtotal	\$11,902,460	\$11,902,460	\$11,779,460	\$82,439,000										
EM&V ¹⁴	\$189,405	\$189,405	\$187,405	\$1,318,800										
Total	\$12,091,865	\$12,091,865	\$11,966,865	\$83,757,800										
Portfolio														
Program														
Year PA														
Budget														
Total	\$10,998,000	\$10,998,000	\$10,870,000	\$85,736,000										
Authorized														
Portfolio														
PY Budget														
Сар														
Forecast	1.25	1.25	1.25											
Portfolio		/												
PY TRC														
Forecast	1.44	1.44	1.44											
Portfolio														
PY PAC														

¹⁴ EM&V budget includes only the program administrator portion (40%) and excludes the Commission staff portion (60%).

MCE requests Pacific Gas and Electric Company ("PG&E") provide the 2019 budget, including electricity and natural gas energy funding to MCE via quarterly transfers as calculated in the table below.

Fuel Type	2019 Budget	Quarterly Transfer
Total Electric Budget	\$3,994,420	\$998,605
Total Gas Budget ¹⁵	\$2,785,284	\$696,321
Total	\$6,779,704	\$1,694,926

Energy Savings

In approving PAs' business plans, the Commission required ABALs to address energy savings. MCE provides forecasted savings for each program below and a true up of savings for each sector for the entire business plan period.

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¹⁵ Pursuant to OP 36 of D.18-05-041, gas budgets will be transferred to MCE on a quarterly basis.

Annual Rolli	ing Portfoli	o Savings Fo	orecast - Tr	ue-up (kWh	l)			
Sector	2018	2019	2020	2021	2022	2023	2024	2025
Residential	408,473	2,531,902	2,850,293	2,850,293	2,797,634	2,797,634	2,797,634	2,797,634
Commercial	1,438,474	1,967,331	3,641,084	3,641,084	4,246,583	4,246,583	4,246,583	4,246,583
Industrial	n/a	556,588	1,179,161	1,179,161	1,864,651	1,864,651	1,864,651	1,864,651
Agriculture	n/a	799,656	709,938	709,938	659,030	659,030	659,030	659,030
Emerging	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Tech								
Public	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Codes and	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Standards								
WE&T	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Finance	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
OBF Loan	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Pool								
Total	1,846,947	5,855,477	8,380,475	8,380,475	9,567,898	9,567,898	9,567,898	9,567,898
Forecast								
Portfolio				/	/			
Savings								
CPUC	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Goal ¹⁶								
% of	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Goal ¹⁷								

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¹⁶ Not applicable to CCA/REN as of 2018, in template for future ABAL when applicable.

¹⁷ Not applicable to CCA/REN as of 2018, in template for future ABAL when applicable.

Annual Rolli	ng Portfolio	Savings Fo	orecast - Tr	ue-up (kW)				
Sector	2018	2019	2020	2021	2022	2023	2024	2025
Residential	26	233	245	245	235	235	235	235
Commercial	323	358	116	116	81	81	81	81
Industrial	n/a	41	38	38	59	59	59	/ 59
Agriculture	n/a	64	84	84	78	78	78	78
Emerging	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Tech								
Public	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Codes and	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Standards								
WE&T	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Finance	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
OBF Loan	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Pool								
Total	349	696	484	484	454	454	454	454
Forecast								
Portfolio				/				
Savings								
CPUC	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Goal ¹⁸								
% of	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Goal ¹⁹								

MCE Advice Letter 33-E

¹⁸ Not applicable to CCA/REN as of 2018, in template for future ABAL when applicable.

¹⁹ Not applicable to CCA/REN as of 2018, in template for future ABAL when applicable.

Annual Rolli	ng Portfolio	Savings Fo	orecast - Tr	ue-up (ther	ns)			
Sector	2018	2019	2020	2021	2022	2023	2024	2025
Residential	0.07	0.27	0.42	0.42	0.46	0.46	0.46	0.46
Commercial	0.03	0.03	0.01	0.01	0.01	0.01	0.01	0.01
Industrial	n/a	0.07	0.12	0.12	0.14	0.14	0.14	0.14
Agriculture	n/a	0.03	0.01	0.01	0.01	0.01	0.01	0.01
Emerging	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Tech								
Public	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Codes and	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Standards								
WE&T	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Finance	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
OBF Loan	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Pool								
Total	0.10	0.40	0.55	0.55	0.61	0.61	0.61	0.61
Forecast								
Portfolio				/				
Savings								
CPUC	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Goal ²⁰								
% of	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Goal ²¹								

MCE Advice Letter 33-E

²⁰ Not applicable to CCA/REN as of 2018, in template for future ABAL when applicable.

²¹ Not applicable to CCA/REN as of 2018, in template for future ABAL when applicable.

Portfolio and Program Changes

MCE identified several high-level changes to the portfolio that will help optimize cost effectiveness and achieve savings goals. These changes are responsive to current policy and market dynamics and consistent with MCE's business plan.

- MCE aims to utilize NMEC in a number of programs to help, leveraging pay-forperformance contracts and competitive bidding.
- In an effort to reduce administrative costs, core elements of program design, implementation, and management will be shifted to implementers.
- Customers will be empowered to initiate and evaluate their own projects independent of MCE, utilizing a customer-facing online platform to analyze savings potential and solicit bids from contractors.
- MCE will hold competitive solicitations allowing for industry experts and the market to drive program design, implementation of programs, and aggregate customers to deliver meter-verified savings.
- MCE has expanded its portfolio two-fold by doubling its service area and offering programs in new sectors such as large commercial, industrial, agriculture, and single family residential while also increasing offerings under existing commercial and multifamily programs.

MCE anticipates cost-effectiveness to improve over time. MCE is launching programs in new sectors in 2019. This expanded portfolio will experience a natural ramp-up period in which the administrative costs of program design, rollout and customer outreach will have a greater impact on cost effectiveness. Where possible, MCE will reduce implementation costs and customer project costs, which will eventually contribute to a more cost-effective portfolio. MCE describes some of the program-level changes that will improve MCE's portfolio below.

Programs that have ended:

Financing: MCE is not offering its Financing program in 2019. MCE does not claim savings for this program. It is being closed due to low participation and the availability of alternative financing options for customers. MCE will help its customers leverage existing financing programs (*e.g.* offering administered by the California Alternative Energy and Advanced Transportation Financing Authority ("CAEATFA")).

Programs unchanged from 2018 to 2019:

<u>Multifamily Energy Savings</u>: This program provides complimentary walk-through energy assessments and technical assistance to identify energy and water saving opportunities at multifamily properties. To help implement these energy upgrades, the program provides cash rebates, assists with contractor bid solicitations and educates and trains operations and maintenance staff.

Seasonal Savings: This program offers customers the opportunity to make their cooling and heating schedules more efficient through a series of small adjustments to scheduled temperatures by a software algorithm. Customers are offered the program on their thermostat and/or through a phone app and must opt-in to participate.

Programs that have changes:

Commercial: The program provides support to all 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 a customer and contractor-friendly project assessment platform, competitive bidding, contractor training resources and ongoing coordination with PG&E programs which also serve commercial customers. The program is undergoing an expanded scope, alongside new customer and contractor engagement strategies.

Programs to be launched in 2019:

Industrial: This program will provide technical project development resources, procurement support and a mix of deemed and calculated incentives for industrial customers within MCE's service area.

<u>Agricultural:</u> This program will provide technical project development resources, procurement support and a mix of deemed and calculated incentives for agricultural customers.

<u>Single Family, Single Measure</u>: This program will provide home owners the opportunity to receive one-off rebates for measures including lighting; heating, ventilation, and air conditioning ("HVAC"); insulation; and efficient appliances. There will be higher rebates for measures that offer benefits across multiple resources (e.g. water-energy measures).

<u>Single Family Energy Savings</u>: This program will offer a variety of strategies including but not limited to behavioral interventions, zero-net-carbon ("ZNC"), new construction, and comprehensive retrofits.

<u>Single Family Standalone Direct Install</u>: This program will provide no-cost energy and water saving upgrades, health and safety measures, and access to other resources and nonenergy services for single family homeowners and renters. This offering will include conservation education.

<u>Multifamily Single Measure</u>: This program will provide multifamily property owners the opportunity to receive one-off rebates for measures including lighting; heating, ventilation, and air conditioning ("HVAC"); insulation; and efficient appliances. There will be higher rebates for measures that offer benefits across multiple resources (e.g. water-energy measures).

<u>Multifamily Standalone Direct Install</u>: This program will provide no-cost energy and water saving upgrades, health and safety measures, and access to other resources and nonenergy services for multifamily unit residents. This offering will include conservation education for tenants.

Workforce, Education, and Training ("WE&T"): MCE has worked with PG&E to develop coordination guidelines to avoid duplication where appropriate, minimize market confusion, and ensure customer choice, and will continue to do so as the portfolio evolves. MCE's approach to WE&T is to fill gaps and allow the market to dictate program design. MCE will solicit bids to identify existing needs and gaps to determine program design ensuring alignment with policy impacts. MCE will continue working with IOUs to ensure alignment and avoid duplication with the statewide WE&T program.

Attachment A: 2017 Metrics Reporting

MCE provides Attachment A with a reporting on the business plan metrics including data from 2017 activities. The metrics table is the same as was submitted on August 6, 2018 with an additional column for 2017 populated with available data.

Attachment B: CEDARS Filing Submission Receipt

MCE provides the California Energy Data and Reporting System ("CEDARS") Filing Submission Receipt as Attachment B.

<u>Notice</u>

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.

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 filing. Protests should be mailed to:

CPUC, Energy Division Attention: Tariff Unit 505 Van Ness Avenue San Francisco, CA 94102 Email: <u>EDTariffUnit@cpuc.ca.gov</u>

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:

Michael Callahan Policy Counsel MARIN CLEAN ENERGY 1125 Tamalpais Ave. San Rafael, CA 94901 Phone: (415) 464-6045 Facsimile: (415) 459-8095 mcallahan@mceCleanEnergy.org

Meaghan Doran Manager of Customer Programs MARIN CLEAN ENERGY 1125 Tamalpais Ave. San Rafael, CA 94901 Phone: (415) 464-6039 Facsimile: (415) 459-8095 mdoran@mceCleanEnergy.org

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 Michael Callahan at (415) 464-6045 or by electronic mail at <u>mcallahan@mceCleanEnergy.org</u>.

Conclusion

MCE respectfully requests approval of its 2019 energy efficiency portfolio budget.

/s/ Michael Callahan

Michael Callahan Policy Counsel MARIN CLEAN ENERGY

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

California Public Utilities Commission

ADVICE LETTER SUMMARY ENERGY UTILITY



MUST BE COMPLETED BY UT	LITY (Attach additional pages as needed)
Company name/CPUC Utility No.: Marin Clean	Energy
Utility type: ELC GAS WATER PLC HEAT	Contact Person: Michael Callahan Phone #: (415)464-6045 E-mail: mcallahan@mcecleanenergy.org E-mail Disposition Notice to: mcallahan@mcecleanenergy.org
EXPLANATION OF UTILITY TYPE ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat WATER = Water	(Date Submitted / Received Stamp by CPUC) 09/04/2018
Advice Letter (AL) #: 33-E	Tier Designation: 2
Subject of AL: Marin Clean Energy's 2019 Energy	Efficiency Annual Budget Advice Letter
Keywords (choose from CPUC listing): Energy E AL Type: Monthly Quarterly Annu- If AL submitted in compliance with a Commissi Decision 18-05-041, Ordering Paragraphs 40 & 41	fficiency, Compliance al 🔲 One-Time 🔲 Other: on order, indicate relevant Decision/Resolution #:
Does AL replace a withdrawn or rejected AL?	f so, identify the prior AL:
Summarize differences between the AL and th	e prior withdrawn or rejected AL:
Confidential treatment requested Yes	✓ No
If yes, specification of confidential inform Confidential information will be made av nondisclosure agreement. Name and co access to confidential information	natio vailable to appropriate parties who execute a ontact information to request nondisclosure agreement/
Resolution required? 🔲 Yes 🖌 No	
Requested effective date: 10/4/18	No. of tariff sheets: N/A
Estimated system annual revenue effect (%): N	J/A
Estimated system average rate effect (%): N/P	Α
When rates are affected by AL, include attack (residential, small commercial, large C/I, agric	nment in AL showing average rate effects on customer classes ultural, lighting).
Tariff schedules affected: $$_{\rm N/A}$$	
Service affected and changes proposed $^{l:}$ $_{N/\ell}$	A
Pending advice letters that revise the same ta	riff sheets: $_{ m N/A}$

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: <u>EDTariffUnit@cpuc.ca.gov</u> Name: Michael Callahan Title: Policy Counsel Utility Name: Marin Clean Energy Address: 1125 Tamalpais Ave City: San Rafael State: California Telephone (xxx) xxx-xxxx: (415) 464-6045 Facsimile (xxx) xxx-xxxx: (415) 459-8095 Email: mcallahan@mcecleanenergy,org

Name: Meaghan Doran Title: Manager of Customer Programs Utility Name: Marin Clean Energy Address: 1125 Tamalpais Ave City: San Rafael State: California Telephone (xxx) xxx-xxxx: (415) 464-6039 Facsimile (xxx) xxx-xxxx: (415) 459-8095 Email: mdoran@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
Curtailable 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	

<u>Attachment A</u> 2017 Metrics Reporting

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