

February 1, 2021

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



### **MCE Advice Letter 47-E**

#### **RE: 2022 Budget Request and Marketing, Education and Outreach Plan for the Disadvantaged Communities Green Tariff and the Community Solar Green Tariff Programs**

Pursuant to Ordering Paragraph (“OP”) 2 and 4 of Resolution E-4999,<sup>1</sup> Marin Clean Energy (“MCE”) hereby submits this Tier 1 Advice Letter (“AL”) to submit the program budget request and marketing, education and outreach (“ME&O”) plan for the Disadvantaged Communities Green Tariff (“DAC-GT”) and Community Solar Green Tariff (“CS-GT”) programs for the program year (“PY”) 2022.

#### **TIER DESIGNATION**

This AL has a Tier 1 designation pursuant to OP 2 of Resolution E-4999.

#### **EFFECTIVE DATE**

MCE requests that this Tier 1 AL become effective upon date of submittal, which is February 1, 2021.

#### **BACKGROUND**

On June 21, 2018, the California Public Utilities Commission (“Commission” or “CPUC”) approved D.18-06-027, adopting two new community solar programs to promote the use of renewable generation among residential customers in disadvantaged communities (“DACs”),<sup>2</sup> as directed by the California Legislature in Assembly Bill (“AB”) 327 (Perea), Stats. 2013, ch 611. The DAC-GT and the CS-GT programs offer 100% solar energy to eligible customers and provide

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<sup>1</sup> OP 2 and 4 of Resolution E-4999 specifically directed Pacific Gas and Electric Company, Southern California Edison and San Diego Gas & Electric Company to submit annual program budget estimates and ME&O plans to the Commission by February 1 of each year. While the CCA Implementation Advice Letters for the DAC-GT and CS-GT programs are still pending with the Commission, MCE assumes that it must follow the same requirements regarding the budget request approval as the investor-owned utilities.

<sup>2</sup> DACs are defined under D.18-06-027 as communities that are identified in the CalEnviroScreen 3.0 as among the top 25 percent of census tracts statewide, plus the census tracts in the highest five percent of CalEnviroScreen’s Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

a 20% discount on the electric portion of the bill.

Pursuant to OP 17 of D.18-06-027, Community Choice Aggregators (“CCAs”) may develop their own DAC-GT and CS-GT programs and must file a Tier 3 AL to propose implementation details (“Implementation AL”).<sup>3</sup> On May 7, 2020, MCE filed its Implementation AL for the DAC-GT and CS-GT programs with the Commission in MCE AL 42-E. At the time of writing of this AL, the approval of MCE’s Implementation AL is still pending at the Commission.

On June 3, 2019, the Commission issued Resolution E-4999, which approved, with modification, the investor-owned utilities’ (“IOUs”) DAC-GT and CS-GT Implementation ALs. OP 2 of that Resolution directs the IOUs to submit a program budget requests and ME&O plan for the upcoming PY by February 1<sup>st</sup> of each year. The Resolution also provides details regarding the budget submission requirements and process. Furthermore, OP 4 of Resolution E-4999 specifies that Program Administrators must reconcile prior year budget forecasts and expenditures in their annual budget requests.

While Resolution E-4999 specifically directs the IOUs to submit annual program budget requests and ME&O plans, MCE assumes that this requirement equally applies to CCAs as Program Administrators of the DAC-GT and CS-GT programs. The submission and approval of this budget AL is the pre-requisite of having the DAC-GT and CS-GT budgets included in the Energy Resource Recovery Account (“ERRA”) Forecast in June each year. The ERRA Forecast in turn enables cost recovery under the programs. Therefore, MCE is submitting this cover letter to ensure timely cost recovery for its programs.

## **PURPOSE**

MCE hereby submits the budget request for PY 2022 for the DAC-GT and CS-GT programs. Per Resolution E-4999, the budget request covers the budget reconciliation for the previous PY (i.e., PY 2020) and the budget forecast for the upcoming PY (i.e., PY 2022). MCE requests a total budget of \$1,456,113 for the DAC-GT and CS-GT programs for the PY 2022. Additional details can be found in Appendix A.

Once the Commission approves MCE’s budget request, PG&E will be responsible for including the total budget request for MCE’s DAC-GT and CS-GT programs in the 2022 ERRA Forecast filing due in early June of 2021. Once PG&E receives approval of its ERRA Forecast from the Commission, PG&E will set aside the requested MCE budget in a sub-account of its DAC-GT and CS-GT balancing accounts. PG&E will then transfer program funds to MCE as determined in the Resolution approving MCE’s Implementation AL 42-E.<sup>4</sup>

In addition to the budget request, MCE submits its ME&O plan for PY 2022 as Appendix B.

## **CONCLUSION**

MCE respectfully requests the Commission approve the budgets proposed herein and direct PG&E

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<sup>3</sup> D.18-06-027, at p.104 (OP 17).

<sup>4</sup> At the time of writing of this AL, MCE AL 42-E is still pending with the Commission.

to transfer funds sufficient to meet MCE's approved annual budgets per the funding mechanisms discussed above.

## **NOTICE**

A copy of this AL is being served on the official Commission service lists for Rulemaking R.14-07-002.

For changes to this 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**

**\*\*\*Due to the COVID-19 pandemic and the shelter-at-home orders, MCE is currently unable to receive protests or responses to this advice letter via U.S. Mail or fax. Please submit protests or responses to this advice letter to [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov) and [jkopyciok-lande@mccleanenergy.org](mailto:jkopyciok-lande@mccleanenergy.org)\*\*\***

Anyone wishing to protest this advice letter 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 must be submitted 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 Deputy Executive Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter shall be sent by letter or transmitted electronically to the attention of:

Jana Kopyciok-Lande  
Senior Policy Analyst  
Marin Clean Energy  
1125 Tamalpais Ave  
San Rafael, CA 94901  
Email: [jkopyciok-lande@mccleanenergy.org](mailto:jkopyciok-lande@mccleanenergy.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 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 List: R.14-07-002



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person:

Phone #:  
E-mail:  
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type:  Monthly     Quarterly     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:

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

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:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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:

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<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:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

## 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	

# **APPENDIX A**



**Budget Forecast for the Disadvantaged Communities Green  
Tariff and Community Solar Green Tariff Programs for the  
Program Year 2022**

*Proposed by Marin Clean Energy*



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February 1, 2021

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## 1. BACKGROUND

Per Resolution E-4999, annual program budgets must be presented by program and include the following budget line items:<sup>1</sup>

1. Generation cost delta, if any;<sup>2</sup>
2. 20 percent bill discount for participating customers (generation portion);
3. Program administration costs:
  - a. Program management;
  - b. Information technology (IT);
  - c. Billing operations;
  - d. Regulatory compliance; and
  - e. Procurement.
4. Marketing, education and outreach (ME&O) costs:
  - a. Labor costs;
  - b. Outreach and material costs;
  - c. Local CBO/ sponsor costs (for CS-GT only);

In addition to budget reconciliation and forecast, annual program budget submissions also include details on program capacity and customer enrollment numbers for both programs. More specifically, MCE reports on:

1. Existing capacity at previous PY's close;
2. Forecasted capacity for procurement in the upcoming PY;
3. Customers served at previous PY's close; and
4. Forecasted customer enrollment for the upcoming PY.

Finally, MCE will submit the following workpapers to the California Public Utilities Commission (CPUC or Commission) Energy Division staff directly:

1. Calculation of the generation cost delta;
2. Calculation of the 20% bill discount to participating customers;

## 2. BUDGET FORECAST FOR PY 2022

For PY 2022, MCE requests a total budget of \$1,916,303 for the DAC-GT and CS-GT programs. A detailed budget forecast for each program by budget line item can be found in the table below.

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<sup>1</sup> A detailed description of each budget line item can be found in MCE's Implementation Plan, submitted in Appendix A to MCE Advice Letter 42-E filed on May 7, 2020.

<sup>2</sup> Resolution E-4999 establishes that *above market* generation costs should include net renewable resource costs in excess of the otherwise applicable class average generation rate that will be used to calculate the customers' bills. In conversations with the CPUC's Energy Division after the release of the Resolution, it was clarified that this budget line item is intended to cover both a potential higher, as well as lower, cost of the DAC-GT/ CS-GT resources than the otherwise applicable class average generation rate. Hence, the term is updated to state the "*Delta of generation costs between the DAC-GT/ CS-GT resources and the otherwise applicable class average generation rate*".

Table 1: MCE Budget Forecast for PY 2022

Tab	Category	DAC-GT	CS-GT	
1	Generation Cost Delta	\$ 1,118,784	\$ -	
2	20% Bill Discount	\$ 232,258	\$ -	
	<b>Program Administration</b>			
3a	Program Management	\$ 101,250	\$ 136,950	
3b	Information Technology	\$ 23,224	\$ 23,224	
3c	Billing Operations	\$ 37,342	\$ 10,308	
3d	Regulatory Compliance	\$ 14,280	\$ 14,280	
3e	Procurement	\$ 18,235	\$ 31,682	
	<b>Subtotal Program Administration</b>	<b>\$ 194,331</b>	<b>\$ 216,444</b>	
	<b>Marketing, Education &amp; Outreach</b>			
4a	Labor Costs	\$ 18,445	\$ 54,740	
4b	Outreach and Material Costs	\$ 2,800	\$ 53,500	
4c	Local CBO/ Sponsor Costs	\$ -	\$ 25,000	
	<b>Subtotal ME&amp;O</b>	<b>\$ 21,245</b>	<b>\$ 133,240</b>	
<b>Total</b>		<b>\$ 1,566,618</b>	<b>\$ 349,684</b>	<b>\$ 1,916,303</b>

MCE provides the following clarifying notes regarding the budget summary.

### Generation Cost Delta

MCE does not anticipate having *new* DAC-GT or CS-GT projects come online in 2022 due to the need for soliciting such projects. However, for the DAC-GT program, MCE will use an interim project while new projects are being solicited and built. Hence, the generation cost delta budget forecast for the DAC-GT program is based on the cost of the interim resource selected. More detail is provided in Appendix A to MCE Advice Letter (AL) 42-E.

### 20 Percent Bill Discount

As described in more detail in MCE AL 42-E, MCE proposes to only calculate the 20% discount for the generation portion of the electric bill.<sup>3</sup> The respective utility (in MCE’s case PG&E) would be responsible for calculating the 20% discount on the delivery portion of the bill for CCA program participants. MCE only expects to have customers enrolled in the DAC-GT program in PY 2022. Customer enrollment for the CS-GT program is expected to begin in January 2023.

### Program Administration Costs

Program management includes program development and management, budgeting, and reporting. IT costs include the costs to develop program tools and updating existing systems to accommodate program enrollment and billing. At this point in time, MCE expects the majority of IT costs to occur in 2022 to accommodate for the roll-out of the hybrid billing methodology in late 2022 or

<sup>3</sup> At the time of filing of this 2021 Budget Advice Letter, the approval of MCE’s Implementation AL 42-E is still pending with the Commission.

early 2023.

Billing operations covers costs for ongoing billing operations and customer support once all systems are developed. Regulatory covers costs for regulatory compliance and related program filings with the Commission. Procurement covers the costs to develop and manage the solicitations for solar resources under the program, as well as annual renewable energy credit (REC) retirement and compliance functions.

### **Marketing, Education and Outreach (ME&O)**

ME&O budgets are split in three categories – (1) MCE labor costs; (2) MCE direct costs for outreach and material; and (3) funds provided to the local CBOs who function as the sponsor for the CS-GT program.

## **3. BUDGET CAPS**

Resolution E-4999 establishes a budget cap of 10% of the total budget for program administration costs and a budget cap of 4% of the total budget for ME&O costs.<sup>4</sup> However, administrative and ME&O costs may be higher than these budget allocations in the first two years of program implementation (i.e., PYs 2021 and 2022 for MCE), acknowledging that program start-up costs may be higher. Hence, MCE will only include information on budget caps in subsequent submissions of the Annual Budget Advice Letter.

## **4. BUDGET RECONCILIATION FOR PY 2020**

MCE submitted a budget forecast for PY 2020 as an attachment to its Implementation AL 42-E which was filed with the Commission on May 7, 2020. Due to delays in the AL approval process, MCE did not launch the DAC-GT and CS-GT programs in 2020 as originally expected. Hence, MCE is reconciling all forecasted program costs from 2020 in this budget advice letter. MCE is now considering 2021 to be its first program year. The table below shows the forecasted costs for PY 2020 per budget line item that will be carried forward to future program years.

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<sup>4</sup> Resolution E-4999 determined that Program Administrators can submit a Tier 3 Advice Letter requesting an adjustment to the budget allocations if the need arises. See Resolution E-4999 at p.27.

Table 2: MCE Budget Reconciliation for PY 2020

Tab	Category	DAC-GT			CS-GT		
		Forecast	Actual	True-up	Forecast	Actual	True-up
1	Generation Cost Delta	\$ 36,199	\$ -	\$ 36,199	\$ -	\$ -	\$ -
2	20% Bill Discount	\$ 7,564	\$ -	\$ 7,564	\$ -	\$ -	\$ -
	<b>Program Administration</b>						
3a	Program Management	\$ 118,820	\$ -	\$ 118,820	\$ 89,420	\$ -	\$ 89,420
3b	Information Technology	\$ 24,814	\$ -	\$ 24,814	\$ 24,814	\$ -	\$ 24,814
3c	Billing Operations	\$ 23,180	\$ -	\$ 23,180	\$ 5,970	\$ -	\$ 5,970
3d	Regulatory Compliance	\$ 11,760	\$ -	\$ 11,760	\$ 11,760	\$ -	\$ 11,760
3e	Procurement	\$ 20,295	\$ -	\$ 20,295	\$ 34,995	\$ -	\$ 34,995
	<b>Subtotal Program Administration</b>	<b>\$ 198,869</b>	<b>\$ -</b>	<b>\$ 198,869</b>	<b>\$ 166,959</b>	<b>\$ -</b>	<b>\$ 166,959</b>
	<b>Marketing, Education &amp; Outreach</b>						
4a	Labor Costs	\$ 21,560	\$ -	\$ 21,560	\$ 5,390	\$ -	\$ 5,390
4b	Outreach and Material Costs	\$ 5,650	\$ -	\$ 5,650	\$ 3,000	\$ -	\$ 3,000
4c	Local CBO/ Sponsor Costs	\$ -	\$ -	\$ -	\$ 15,000	\$ -	\$ 15,000
	<b>Subtotal ME&amp;O</b>	<b>\$ 27,210</b>	<b>\$ -</b>	<b>\$ 27,210</b>	<b>\$ 23,390</b>	<b>\$ -</b>	<b>\$ 23,390</b>
<b>Total</b>		<b>\$ 269,841</b>	<b>\$ -</b>	<b>\$ 269,841</b>	<b>\$ 190,349</b>	<b>\$ -</b>	<b>\$ 190,349</b>

## 5. 2022 BUDGET REQUEST

Based on the budget forecast for PY 2022 presented in section 2 and the budget reconciliation for PY 2020 presented in section 4, MCE is requesting a total budget of \$1,456,113 for the DAC-GT and CS-GT programs in this budget AL.

*Table 3: MCE Budget Request for PY 2022*

	DAC-GT	CS-GT	Total
Budget Carry-over from PY 2020	\$ 269,841	\$ 190,349	\$ 460,190
Budget Request for PY 2022	\$ 1,566,618	\$ 349,684	\$ 1,916,303
<b>TOTAL</b>	<b>\$1,296,777</b>	<b>\$ 159,336</b>	<b>\$1,456,113</b>

## 6. PROGRAM CAPACITY AND ENROLLMENT NUMBERS

MCE reports forecasted program capacity and customer enrollment numbers for PY 2022 in the table below. MCE is unable to report on existing program capacity and customer enrollment numbers to date as the programs have not launched yet.

MCE is only reporting estimated program capacity and enrollment numbers for the DAC-GT program, as this program is expected to be served by an interim solar resource in MCE's portfolio while new resources are being procured specifically for the program. For the CS-GT program, MCE will procure new solar resources that are only expected to come online in 2023.

*Table 4: Program Capacity and Enrollment Count for DAC-GT for PY 2022*

Category	DAC-GT	CS-GT
Estimated capacity to be procured (MW)	4.646	1.2825
Estimated customer enrollment (#)	2303	0

# **APPENDIX B**



**Marketing, Education and Outreach Plan for the Disadvantaged  
Communities Green Tariff and Community Solar Green Tariff  
Programs for Program Year 2022**

*Proposed by Marin Clean Energy*



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February 1, 2021

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## 1. PURPOSE AND GOALS

MCE will develop and implement a targeted customer marketing, education, and outreach (ME&O) campaign under the Disadvantaged Communities Green Tariff (DAC-GT) and Community Solar Green Tariff (CS-GT) programs to ensure potential customers in disadvantaged communities (DACs) are aware of the opportunity to benefit from the programs.

MCE will develop and implement separate targeted customer marketing, education, and outreach (ME&O) campaigns for the DAC-GT and CS-GT programs due to the differing enrollment processes of the two programs. Eligible customers for DAC-GT will be identified and automatically enrolled in the program by MCE. Hence, no customer recruitment for program participation is required. Eligible customers for CS-GT will not be automatically enrolled in the program; instead will be required to opt their accounts into the program by completing an enrollment form.

MCE's ME&O strategy for the DAC-GT program has three main goals:

1. Notify DAC-GT customers that their account has been automatically enrolled in the program;
2. Provide information (i.e., FAQs) about the program;
3. Increase customer awareness of energy use, savings opportunities, other customer incentives, rate options (i.e. TOU), discounts, or programs.

The main goals of the CS-GT ME&O strategy are:

4. Enroll eligible customers in the CS-GT program;
5. Increase awareness of, and enrollment in, California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) programs;
6. Increase customer awareness of energy use, savings opportunities, other customer incentives, rate options (i.e. TOU), discounts, or programs;
7. Address barriers to program participation and leverage best practices to participation and ensure that outreach to DAC and hard-to-reach customers is accessible and equitable.

For both ME&O campaigns, MCE aims to achieve meaningful and diverse customer engagement through a culturally-competent, multilingual approach. For CS-GT, MCE will develop a targeted customer engagement campaign that leverages community-based marketing best practices such as:

- A mix of multilingual and culturally-competent communications including community advertising (e.g., banners, newsprint), geo-targeted digital ads, and direct mail, and
- Direct customer outreach and partnerships with community-based organizations (CBOs) and local government agencies.

Ultimately, MCE will measure ME&O program success for the CS-GT program by the number of customers enrolled in the program. We will also measure program success by the overall number of customers reached, and the diversity of customers reached.

The following subsections provide additional details about MCE's ME&O approach for the DAC-GT and CS-GT programs.

## **2. GUIDING PRINCIPLES**

MCE is committed to developing diverse and culturally appropriate communication strategies to ensure that stakeholders can participate in decisions and actions that impact their communities. As such, MCE commits to the following guiding principles throughout the ME&O engagement process for the DAC-GT and CS-GT programs. MCE aims to:

- Achieve diverse and meaningful engagement that reflects the demographics of DAC communities to ensure equitable outreach across race, income and age barriers;
- Maintain transparency and accessibility of information by bringing the information directly to customers in their neighborhood, their community, or interest space to better engage them in the process;
- Build a collaborative process with community partners to ensure barriers and benefits to participation are considered in the ME&O activities to the maximum extent possible.

## **3. TARGET AUDIENCE**

For the DAC-GT program, MCE will automatically enroll any eligible customers that live in one of the top 10% of DAC census tracts statewide that are located in MCE's service area. Priority will be given to customers who have made an effort to pay, as defined by at least 4 full or partial payments in the last 8 months (category 1). If program capacity remains unsubscribed after enrolling these customers, MCE will enroll additional customers in the following order:

- Customers who have made at least 3 full or partial payments in the past 8 months (category 2)
- Customers who have made at least 2 full or partial payments in the past 8 months (category 3)<sup>1</sup>

If there is not enough program capacity to enroll all customers in each category under the DAC-GT program, customers from the respective category will be randomly selected for program enrollment. MCE will monitor program attrition on a monthly basis and enroll additional customers from the waitlist as appropriate.

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<sup>1</sup> MCE has the capacity to serve approximately 2303 customers under the DAC-GT program, based on an allocated program capacity of 4.646MW.

The following table shows the list of eligible census tracts for DAC-GT auto-enrollment.

*Figure 1. Qualifying Neighborhoods in MCE Service Territory for DAC-GT Auto-enrollment*

<b>90% Cal Enviroscreen Score</b>			
<b>Census Tract</b>	<b>California County</b>	<b>ZIP</b>	<b>Nearby City (to help approximate location only)</b>
6013379000	Contra Costa	94804	Richmond
6013312000	Contra Costa	94565	Pittsburg
6013365002	Contra Costa	94801	Richmond
6013377000	Contra Costa	94801	Richmond

For the CS-GT program, the primary target audience for the ME&O strategy are existing and eligible CARE/FERA customers living in top 25% DAC communities statewide per CalEnviroscreen. In MCE’s service area, DAC communities include customers in the following neighborhoods:

Figure 2. Qualifying Neighborhoods in MCE Service Territory for CS-GT

Census Tract	Nearby City (to help approximate location only)	ZIP	California County
6013305000	Antioch	94509	Contra Costa
6013320001	Martinez	94553	Contra Costa
6013302005	Oakley	94561	Contra Costa
6013312000	Pittsburg	94565	Contra Costa
6013310000	Pittsburg	94565	Contra Costa
6013311000	Pittsburg	94565	Contra Costa
6013314103	Pittsburg	94565	Contra Costa
6013314104	Pittsburg	94565	Contra Costa
6013313102	Pittsburg	94565	Contra Costa
6013309000	Pittsburg	94565	Contra Costa
6013313101	Pittsburg	94565	Contra Costa
6013379000	Richmond	94804	Contra Costa
6013365002	Richmond	94801	Contra Costa
6013377000	Richmond	94801	Contra Costa
6013382000	Richmond	94804	Contra Costa
6013376000	Richmond	94801	Contra Costa
6013380000	Richmond	94804	Contra Costa
6013375000	Richmond	94801	Contra Costa
6013381000	Richmond	94804	Contra Costa
6013358000	Rodeo	94572	Contra Costa
6013368002	San Pablo	94806	Contra Costa
6013366002	San Pablo	94806	Contra Costa
6013368001	San Pablo	94806	Contra Costa
6013364002	San Pablo	94806	Contra Costa
6013392200	San Pablo	94806	Contra Costa
6095250701	Vallejo	94590	Solano
6095250801	Vallejo	94592	Solano
6095250900	Vallejo	94590	Solano
6095251802	Vallejo	94589	Solano
6095251901	Vallejo	94589	Solano

## 4. ME&O TACTICS AND STRATEGIES

### 4.1. Communications and Media Content

A variety of communications and media content will be developed to promote the programs, including flyers and fact sheets, as well as content on MCE’s website. This material will be translated and improved throughout the ME&O strategy via message testing to ensure it is culturally competent and effective. Additionally, for the CS-GT program, MCE will run social media campaigns, as well as print and digital advertisements, in multiple languages to encourage program enrollment. Direct mailing and email blasts will also be utilized to target customers.

## **4.2. Community Outreach**

To meet our ME&O goals, MCE will develop an outreach and engagement strategy leveraging the key community outreach tactics summarized below. The community outreach strategy will include a multilingual and culturally competent approach to engagement and consider the specific needs of DAC communities in MCE's service area. CS-GT outreach will be informed by data (census tracts, 4013, etc.) in order to identify customers who are most likely to enroll in the programs.

### **4.2.1. Grassroots Outreach**

MCE will conduct grassroots outreach to engage directly with community members at community events. MCE already regularly attends and sponsors many community events throughout its service area, including neighborhood festivals, farmers markets, holiday celebrations, and special events. Under the community outreach strategy for the CS-GT programs, MCE will focus on expanding the breadth of events attended in DAC neighborhoods.

MCE will utilize the expertise of community leaders to identify impactful events and will offer workshops and webinars as appropriate. As community events and workshops are held, we will closely track the diversity in race, age and income of participants, to ensure that participation reflects census distribution demographics of the DAC communities. Additionally, we will maximize convenience of meetings and events to public transportation, and ensure events are ADA accessible.

Due to COVID-19, appropriate considerations will be made for MCE attendance at in-person events. When possible, in person community outreach will be replaced with virtual workshops, webinars and digital toolkits.

### **4.2.2. Partnerships with Community Based Organizations**

Partnering with Community Based Organizations (CBOs) is a critical facet of MCE's ME&O plan. CBOs have intimate knowledge of the local communities they serve and will serve as valuable resources for how best to conduct outreach that makes sense for members of their communities. As MCE engages with CBO partners, we seek to establish open dialogue, build awareness and understanding among community members, identify community-specific issues, and develop methods for disseminating relevant information. For example, CBOs will help coordinate program-specific workshops to disseminate program information to their constituencies. MCE will provide funding for CBOs to conduct outreach for the CS-GT program.

Additionally, many other local City departments already conduct outreach in the same communities in which we will conduct program outreach. MCE will investigate and pursue opportunities to collaborate as appropriate.

### **4.3. Program Leveraging**

California offers a plethora of clean energy, energy efficiency, and energy storage programs, with several of them targeting income-qualified customers or customers in DACs. Complementing the state's programs, MCE also has developed a wide range of in-house program offerings with many of them focusing on vulnerable customers. MCE's Single Point of Contact (SPOC) model provides "behind-the-scene" coordination with various programs and funding sources in order to provide MCE's customers with the comprehensive, streamlined "one-stop-shop" guidance they need to navigate and enroll in these different offerings, maximizing the benefit to the customers while interweaving the value of all leveraged programs.

Under the DAC-GT/CS-GT ME&O plan, MCE will leverage its relationships and interactions with customers through existing programs to inform, educate and encourage program participation through its SPOC model. For example, MCE will leverage the following programs for joint outreach efforts: MCE's newly developed Battery Energy Storage Programs, MCE's low-income solar program for homeowners, MCE's Low-Income Families and Tenants (LIFT) pilot that offers energy efficiency upgrades to low-income multifamily properties, and the MCEv program, an electric vehicle rebate program for low-income customers.

Additionally, MCE will pursue program leveraging with relevant programs run by partners and other local CBOs and government entities.



Figure 3. MCE ME&O Tactics and Strategies

### Communications and Media Content

- Social Media\*
- MCE Website
- Flyers/ fact sheets
- Print and digital advertisement
  - Direct mailings
  - Email blasts

### Grassroots Outreach

- Community Events
- Workshops and Webinars
- Collaboration with Community Leaders

### CBO Partnerships

- Joint outreach
- Funding support

### Program Leveraging

- MCE Energy Storage Program(s)
- MCE low-income solar program
  - MCE LIFT pilot
  - MCEv program
- Other CA and local programs

\*Component of CS-GT ME&O only. Due to auto enrollment provisions and to limit customer confusion about program eligibility, these tactics will not be used for the DAC-GT program.

## 5. METRICS TRACKING

Because MCE is using multiple tactics for ME&O, a variety of metrics will be used to evaluate the effectiveness of each effort. Our primary measure of effectiveness is the number of customers reached, which can be measured by:

- DAC-GT
  - Number of customers enrolled based on auto enrollment criteria;
  - Number of customers opting to cancel program participation.
- CS-GT
  - Total number of enrollees;
  - Total CARE and FERA enrollment achieved through CS-GT outreach;
  - Total number of customers reached;
  - Diversity in race, age and income of event participants, with participation that reflects census distribution demographics of the DAC communities;
  - Direct mail and email - email click-through and open rates;
  - Indirect website visits and page views, social media engagement and impressions;
  - Total number of events and distribution of events by neighborhood.

By regularly monitoring these measures, MCE will be able to make changes in its approach or shift the mix of ME&O channels to improve the effectiveness of outreach, if necessary. Additionally, feedback from CBO partners, surveys, on-the-ground interactions, and message testing could alter the strategy pursued.