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February 1, 2022

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

### **MCE Advice Letter 58-E**

**RE: 2023 Budget Request and Marketing, Education and Outreach Plan for the Disadvantaged Communities Green Tariff and the Community Solar Green Tariff Programs**

Pursuant to Ordering Paragraphs (“OP”) 2 and 4 of Resolution E-4999,<sup>1</sup> and OP 3 of Resolution E-5125,<sup>2</sup> Marin Clean Energy (“MCE”) hereby submits this Tier 2 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”) 2023.

### **TIER DESIGNATION**

This AL has a Tier 2 designation pursuant to OP 3 of Resolution E-5125.

### **EFFECTIVE DATE**

Pursuant to G.O. 96-B, MCE requests that this Tier 2 AL become effective on March 3, 2022, which is 30 calendar days from the date of this filing.

### **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>3</sup> as

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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. MCE’s implementation Advice Letter, MCE AL 42-E/E-A/E-B was approved in Resolution E-5124, which brought MCE under the same program rules and reporting structure applicable to the IOUs.

<sup>2</sup> OP 3 of Resolution E-5125 directed that DAC-GT and CS-GT Annual Budget Advice Letters are to be submitted as Tier 2 ALs to allow for additional review and oversight.

<sup>3</sup> DACs are defined under D.18-06-027 as communities that are identified in the most current version of CalEnviroScreen as among the top 25 percent of census tracts statewide, plus the census tracts in the

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

D.18-06-027 allows Community Choice Aggregators (“CCAs”) to develop their own DAC-GT and CS-GT programs, and states that CCAs that elect to offer DAC-GT and CS-GT must abide by all rules and requirements adopted in that decision.<sup>4</sup> Pursuant to OP 17 of D.18-06-027, MCE filed its Implementation AL (MCE AL 42-E) on May 7, 2020. The Commission approved AL 42-E in Resolution E-5124, issued April 15, 2021.

Resolution E-4999 sets the deadline for submitting annual DAC-GT and CS-GT program budget requests and ME&O plans for the upcoming PY by February 1<sup>st</sup> of each year.<sup>5</sup> The Resolution also provides details regarding the budget submission requirements and process. Furthermore, Resolution E-4999 specifies that Program Administrators must reconcile prior year budget forecasts and expenditures in their annual budget requests.<sup>6</sup>

Per D.18-06-027, the above requirements apply to participating CCAs as well. 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 2023 for the DAC-GT and CS-GT programs. Per Resolution E-4999, the budget request includes both the budget reconciliation for the previous PY (i.e., PY 2021) and the budget forecast for the upcoming PY (i.e., PY 2023). MCE requests a total budget of \$1,100,807 for the DAC-GT and CS-GT programs for PY 2023. 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 2023 ERRA Forecast filing, now due in mid-May of 2022.<sup>7</sup> 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 Resolution E-5124.<sup>8</sup>

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highest five percent of CalEnviroScreen’s Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data. For purposes of this AL, MCE is using CalEnviroScreen 4.0, which was adopted in October 2021.

<sup>4</sup> D.18-06-027, p. 104, OP 17.

<sup>5</sup> Resolution E-4999, OP 2.

<sup>6</sup> Resolution E-4999, OP 4.

<sup>7</sup> At its January 27, 2021 voting meeting, the Commission adopted a PD that, among other things, sets the ERRA forecast filing due date at May 15 of each year. As of the date of preparation for this AL, that decision had not yet been assigned a Decision number.

<sup>8</sup> Resolution E-5124, p. 10.

In addition to the budget request, MCE submits its updated ME&O plan for PY 2023 as Appendix B.

## **CONCLUSION**

MCE respectfully requests the Commission approve the budgets proposed herein and direct PG&E to transfer funds sufficient to meet MCE's approved annual budgets per the funding mechanisms set forth in Resolution E-5124.

## **NOTICE**

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

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

## **PROTESTS**

Anyone wishing to protest this advice 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:

Stephanie Chen  
Senior Policy Counsel  
Marin Clean Energy  
1125 Tamalpais Ave  
San Rafael, CA 94901  
Email: [schen@mcecleanenergy.org](mailto:schen@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 Stephanie Chen at (415) 464-6664 or by electronic mail at [schen@mcecleanenergy.org](mailto:schen@mcecleanenergy.org).

/s/ Stephanie Chen

Stephanie Chen  
Senior Policy Counsel  
MARIN CLEAN ENERGY  
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San Rafael, CA 94901  
Telephone: (415) 464-6664  
Email: [schen@mcecleanenergy.org](mailto:schen@mcecleanenergy.org)

## **Appendices**

Appendix A: PY 2023 Budget Request  
Appendix B: Updated ME&O Plan

cc: Service List for 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
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	

**Budget Forecast for the Disadvantaged Communities Green  
Tariff and Community Solar Green Tariff Programs for the  
Program Year 2023**

*Proposed by Marin Clean Energy*





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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.

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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."

## 2. BUDGET FORECAST FOR PY 2023

For PY 2023, MCE forecasts a total budget of \$1,835,869 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.

*Table 1: MCE Budget Forecast for PY 2023*

Category	DAC-GT	CS-GT	
Generation Cost Delta	\$ 988,083	\$ -	
20% Bill Discount	\$ 280,035	\$ -	
<b>Program Administration</b>			
Program Management	\$ 84,050	\$ 97,150	
Information Technology	\$ 30,537	\$ 19,009	
Billing Operations	\$ 76,735	\$ 34,422	
Regulatory Compliance	\$ 7,860	\$ 7,860	
Procurement	\$ 26,815	\$ 31,093	
CCA Integration Costs	\$ 2,430	\$ -	
<b>Subtotal Program Administration</b>	<b>\$ 225,997</b>	<b>\$ 189,534</b>	
<b>Marketing, Education &amp; Outreach</b>			
Labor Costs	\$ 21,615	\$ 59,605	
Outreach and Material Costs	\$ 20,000	\$ 26,000	
Local CBO/ Sponsor Costs	\$ -	\$ 25,000	
<b>Subtotal ME&amp;O</b>	<b>\$ 41,615</b>	<b>\$ 110,605</b>	
<b>Total</b>	<b>\$ 1,535,730</b>	<b>\$ 300,139</b>	<b>\$ 1,835,869</b>

MCE provides the following clarifying notes regarding the budget summary.

### Generation Cost Delta

MCE has received bids for new projects to support DAC-GT, and is currently in the contract negotiation process. MCE conservatively anticipates that these resources may not come online until 2024. As such, MCE will continue to use an interim resource to support DAC-GT, and the DAC-GT generation cost delta budget forecast for 2023 is based on this interim resource. MCE did not receive any bids for CS-GT projects in its 2021 solicitation, and as such does not include a forecast for the CS-GT generation cost delta in this AL.

### 20 Percent Bill Discount

As set forth in Resolution E-5124, MCE receives the full bill information from PG&E on a monthly basis. MCE then calculates and presents the full 20% bill discount, which is shown on the generation portion of customer bills.<sup>3</sup> MCE only expects to have customers enrolled in the DAC-GT program in PY 2023. Customer enrollment for the CS-GT program is expected to begin in early 2024.

<sup>3</sup> Resolution E-5124, p. 12.

### **Program Administration Costs**

Program management includes program development, management, budgeting, and reporting. IT costs include the costs to develop program tools and updating existing systems to accommodate program enrollment and billing.

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 cap of 10% of the total budget for program administration costs and a cap of 4% of the total budget for ME&O costs, to apply beginning with each administrator's third program year.<sup>4</sup> Subsequently, in recognition that these programs may exceed the established caps because of their relatively small size, the time it takes to launch, and the management-intensive program design of CS-GT, and other factors, the Commission permits PAs whose budgets exceed the established caps to submit a rationale supporting the exceedance in their Annual Budget Advice Letters (ABAL).<sup>5</sup> The ABAL was elevated from Tier 1 to Tier 2 to allow for additional review of this and other ABAL components.<sup>6</sup>

The 2023 budget forecast summarized above in Table 1 results in program administration budgets of 15% for DAC-GT and 63% for CS-GT, and ME&O budgets of 3% for DAC-GT and 37% for CS-GT. As such, MCE requests an adjustment to the program administration budget cap for both DAC-GT and CS-GT, and to the ME&O budget cap for CS-GT, for PY 2023. The factors contributing to these forecasts are described below.

### 2023 DAC-GT Program Administration Budget Forecast

MCE anticipates that the resources it solicited in 2021 to supply DAC-GT customers will come online in late 2023 or early 2024, which will require additional program administration and billing operations staff time to facilitate the installation of these resources and the integration of the new resources into the program. MCE anticipates that these will be one-time costs associated with the transition.

Additionally, MCE and PG&E continue to work toward a fully automated billing solution, which

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<sup>4</sup> Resolution E-4999, p. 27.

<sup>5</sup> Resolution E-5125, p. 7.

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

will reduce the staff time needed to ensure that customers receive the full benefit of DAC-GT enrollment in a timely manner. Until that fully automated solution is in place, MCE anticipates higher billing operations costs to ensure that enrolled customers are billed and credited correctly.

Finally, MCE only began enrolling customers in DAC-GT in fall of 2021, just a few months before the submission of this AL. As such, MCE is still evaluating what staff time and direct costs will be required to run its program in a steady state. MCE anticipates it will further refine its forecasting in future budget ALs, with the benefit of additional experience administering this program. These factors in conjunction with the relatively small capacity allocation assigned to MCE<sup>7</sup> cause MCE's program administration budget forecast to exceed 10% of its total DAC-GT budget.

### 2023 CS-GT Program Administration Budget Forecast

As noted above, MCE has not yet received any qualifying bids for CS-GT projects, and therefore does not include any generation cost delta or bill discount forecasts for CS-GT. However, program administration costs are still being incurred, as MCE works to identify qualifying projects, create and refine billing and other administrative processes, and prepare to launch its program. As illustrated in Table 2 below, this delay in launching CS-GT has significantly reduced MCE's actual costs incurred for program administration in 2021, but has shifted some of these costs forward into the 2023 forecast.

As discussed in Resolution E-5125, CS-GT may be particularly difficult to hold to a 10% program administration cost cap because of its management-intensive program design, relatively small capacity allocations,<sup>8</sup> and extended procurement and customer enrollment time frames. MCE has experienced some of these challenges to date in its attempts to identify potential community sponsors and project sites that meet CS-GT criteria. MCE includes in its forecast sufficient staff time to properly support CS-GT rollout, including procurement and customer enrollment, in anticipation of receiving successful project bids in its next solicitation.

### 2023 CS-GT ME&O Forecast

As noted above, to date MCE has no CS-GT generation cost delta or bill discount forecasts to accompany the ME&O costs. As detailed in the accompanying ME&O plan for 2023 (Appendix B) MCE anticipates incurring ME&O costs in 2023 to prepare for potential program enrollment in 2024, as it will continue to work to identify qualifying projects to participate in CS-GT. As discussed above and illustrated in Table 2 below, the delay in launching CS-GT has significantly reduced MCE's actual costs for ME&O incurred in 2021, but has shifted some of these costs forward into the 2023 forecast.

Finally, CS-GT's program design allows for financial support of community sponsors, which MCE has included in its 2023 budget forecast in anticipation of securing a qualifying project. These factors all contribute to a CS-GT ME&O forecast in excess of the established 4% cap.

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<sup>7</sup> Per Resolution E-5124, MCE's capacity allocation for DAC-GT is 4.646 MW.

<sup>8</sup> Per Resolution E-5124, MCE's capacity allocation for CS-GT is 1.2825 MW.

#### **4. BUDGET RECONCILIATION FOR PY 2021**

MCE submitted a budget forecast for PY 2021 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. As such, and as noted in MCE's 2022 ABAL, MCE is now considering 2021 to be its first program year. The table below shows the forecasted and actual costs for PY 2021 per budget line item, as well as the true-up amount that will be carried forward to future program years.

Table 2: MCE Budget Reconciliation for PY 2021

Category	DAC-GT			CS-GT		
	Forecast	Actual	True-up	Forecast	Actual	True-up
Generation Cost Delta	\$ 379,234	\$ 151,027	\$ 228,207	\$ -	\$ -	\$ -
20% Bill Discount	\$ 162,850	\$ 60,489	\$ 102,361	\$ -	\$ -	\$ -
<b>Program Administration</b>						
Program Management	\$ 93,000	\$ 24,060.80	\$ 68,939	\$ 125,400	\$ 7,619	\$ 117,781
Information Technology	\$ 44,197	\$ 697.95	\$ 43,499	\$ 24,053	\$ 698	\$ 23,355
Billing Operations	\$ 34,325	\$ 2,791.80	\$ 31,533	\$ 9,475	\$ 2,792	\$ 6,683
Regulatory Compliance	\$ 6,480	\$ 5,184.00	\$ 1,296	\$ 6,480	\$ 4,806	\$ 1,674
Procurement	\$ 14,545	\$ 12,447.00	\$ 2,098	\$ 19,945	\$ 8,910	\$ 11,035
CCA Integration Costs	\$ 12,856	\$ 15,556.00	\$ (2,700)	\$ 1,263	\$ -	
<b>Subtotal Program Administration</b>	<b>\$ 205,403</b>	<b>\$ 60,738</b>	<b>\$ 144,666</b>	<b>\$ 186,617</b>	<b>\$ 24,825</b>	<b>\$ 160,529</b>
<b>Marketing, Education &amp; Outreach</b>						
Labor Costs	\$ 43,740	\$ 4,239	\$ 39,501	\$ 14,364	\$ 2,741	\$ 11,624
Outreach and Material Costs	\$ 7,000	\$ 375	\$ 6,625	\$ 21,550	\$ -	\$ 21,550
Local CBO/ Sponsor Costs	\$ -	\$ -	\$ -	\$ 20,000	\$ -	\$ 20,000
<b>Subtotal ME&amp;O</b>	<b>\$ 50,740</b>	<b>\$ 4,614</b>	<b>\$ 46,126</b>	<b>\$ 55,914</b>	<b>\$ 2,741</b>	<b>\$ 53,174</b>
<b>Total</b>	<b>\$ 798,227</b>	<b>\$ 276,867</b>	<b>\$ 521,360</b>	<b>\$ 242,531</b>	<b>\$ 27,565</b>	<b>\$ 213,702</b>

## 5. 2023 BUDGET REQUEST

Based on the budget forecast for PY 2023 presented in Section 2 and the budget reconciliation for PY 2021 presented in section 4, MCE is requesting a total budget of \$1,100,807 for the DAC-GT and CS-GT programs in this budget AL.

*Table 3: MCE Budget Request for PY 2023*

	DAC-GT	CS-GT	Total
Budget Carry-over from PY 2021	\$ 521,360	\$ 213,702	\$ <b>735,062</b>
Budget Forecast for PY 2023	\$ 1,535,730	\$ 300,139	\$ <b>1,835,869</b>
<b>TOTAL</b>	<b>\$ 1,014,371</b>	<b>\$ 86,437</b>	<b>\$ 1,100,807</b>

MCE reports existing program capacity and customer enrollment numbers for PY 2021 in Table 4 below. In PY 2021, enrolled customers were served with an interim solar resource, as discussed above.

*Table 4: Program Capacity and Enrollment Count for DAC-GT and CS-GT for PY 2021*

Category	DAC-GT	CS-GT
Existing program capacity (MW)	4.646	0
Participating customers (#)	3,081	0

In Table 5, MCE reports forecasted capacity and customer enrollment for PY 2023. As noted above, MCE is currently in contract negotiations for a new solar project to support DAC-GT, and conservatively estimates that the new project will come online in late 2023 or early 2024. However, having received no qualifying bids for CS-GT projects in 2021, MCE does not anticipate launching a CS-GT program and enrolling customers until 2024.

*Table 5: Forecasted Program Capacity and Enrollment Count for DAC-GT and CS-GT for PY 2023*

Category	DAC-GT	CS-GT
Estimated capacity to be procured (MW)	4.646	0
Estimated customer enrollment (#)	3,052	0



**Marketing, Education and Outreach Plan for the Disadvantaged  
Communities Green Tariff and Community Solar Green Tariff  
Programs for Program Year 2023**

*Proposed by Marin Clean Energy*



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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, interested customers will be required to opt their accounts into the program by completing an enrollment form. For both ME&O campaigns, MCE aims to achieve meaningful and diverse customer engagement through a culturally-competent, multilingual approach.

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; and
3. Notify DAC-GT customers if they no longer meet eligibility criteria for the program (i.e., moved, installed solar, or no longer enrolled in CARE or FERA) and provide instructions on how to continue their program participation (if applicable).

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

1. Enroll eligible customers in the CS-GT program (expected in 2024);
2. Increase awareness and enrollment in California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) programs; and
3. Address barriers to program participation and leverage best practices to ensure that outreach to DAC and historically impacted customers is accessible and equitable.

## **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 by bringing information directly to customers' neighborhood, community, or interest space to better engage them in the process; and
- 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, in 2021 MCE automatically enrolled eligible customers that live in one of the top 10% of DAC census tracts statewide that are in MCE's service area, as defined by CalEnviroScreen 4.0. Priority was given to customers who 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 insufficient program capacity to enroll all customers in a category under the DAC-GT program, customers from the eligible 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.

Figure 1 shows the list of eligible census tracts for DAC-GT auto-enrollment.

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

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

<sup>1</sup> MCE has the capacity to serve approximately 2,303 customers under the DAC-GT program, based on an allocated program capacity of 4.646 MW.

For the CS-GT program, the target audience for the ME&O strategy are existing and eligible CARE/FERA customers living in top 25% DAC census tracts as defined by CalEnviroScreen 4.0. Figure 2 shows the list of eligible census tracts for CS-GT in MCE's service area.

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

<b>Census Tract</b>	<b>California County</b>	<b>ZIP</b>	<b>Nearby City (to help approximate location only)</b>
6013305000	Contra Costa	94509	Antioch
6013306002	Contra Costa	94509	Antioch
6013306003	Contra Costa	94509	Antioch
6013307102	Contra Costa	94509	Antioch
6013314102	Contra Costa	94565	Pittsburg
6013314103	Contra Costa	94565	Pittsburg
6013314200	Contra Costa	94565	Pittsburg
6013336201	Contra Costa	94520	Concord
6013365002	Contra Costa	94801	Richmond
6013369001	Contra Costa	94806	San Pablo
6013376000	Contra Costa	94801	Richmond
6013377000	Contra Costa	94801	Richmond
6013379000	Contra Costa	94804	Richmond
6013380000	Contra Costa	94804	Richmond
6013382000	Contra Costa	94804	Richmond
6095250701	Solano	94590	Vallejo
6095250900	Solano	94590	Vallejo
6095251000	Solano	94590	Vallejo
6095251600	Solano	94590	Vallejo
6095251803	Solano	94589	Vallejo
6095251901	Solano	94589	Vallejo

## **4. ME&O TACTICS AND STRATEGIES**

### **4.1. Communications and Media Content**

MCE will continue to use the communications and media content originally developed to promote DAC-GT, including mailers and web. Similar materials will be developed in preparation for the CS-GT launch, currently expected in 2024. At launch, MCE will promote CS-GT through digital, social media, and print advertisements; and customer emails and mailers in multiple languages to encourage program enrollment.

### **4.2. Community Outreach**

To meet its 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 eligible communities in MCE's service area. CS-GT outreach will be informed by data (including census tracts, the 4013 customer data file from PG&E, etc.) in order to identify customers who are most likely to enroll in the program.

#### **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 program, 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, MCE will closely track the diversity in race, age and income of participants, to ensure that participation reflects census distribution demographics of the DAC communities. MCE will ensure that all MCE-hosted meetings and events, either virtual or in-person, are ADA accessible. MCE will also endeavor to ensure that all in-person events are accessible by public transportation.

At this time, it is difficult to predict whether COVID-19 and associated public health precautions will continue to impact community engagement in 2023. Where required, recommended, or appropriate, MCE will conduct virtual workshops and webinars, and make use of digital toolkits, to ensure community members can safely learn about and enroll in CS-GT. MCE will continue to participate in in-person community outreach events as long as it is safe to do so.

#### **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. In engaging with CBO partners, MCE seeks 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 can 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 MCE will conduct CS-GT outreach. MCE will investigate and pursue opportunities to collaborate as appropriate.

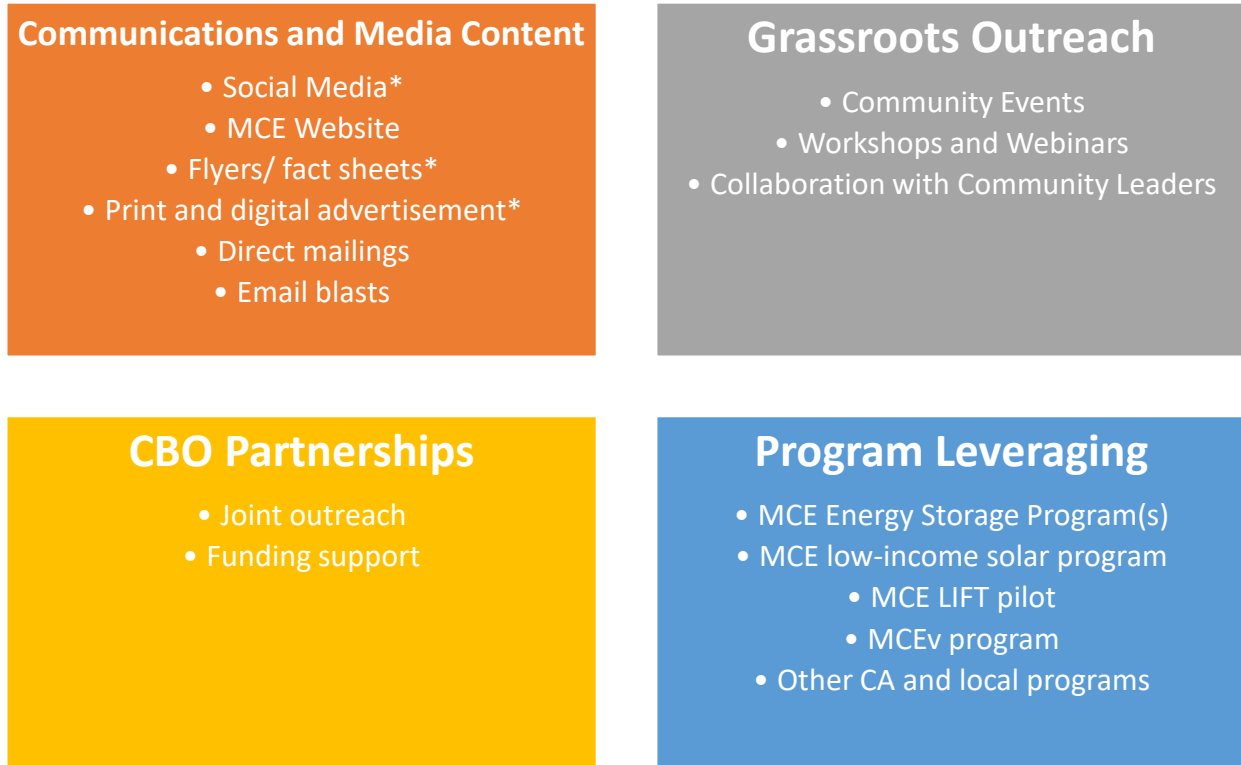
#### **4.3. Program Leveraging**

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 has also developed a wide range of in-house program offerings, many of which also focus on low-income customers and/or customers in DACs. MCE's Any Open Door model provides "behind-the-scenes" 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 Any Open Door model. For example, MCE will leverage the following programs for joint outreach efforts: MCE's Energy Storage Program, MCE's Low-Income Families and Tenants (LIFT) pilot that offers electrification and energy efficiency upgrades to low-income multifamily properties, MCE's electric vehicle rebate program for low-income customers, and debt relief programs like the Arrearage Management Program (AMP) and the Low Income Home Energy Assistance Program (LIHEAP).

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

*Figure 3. MCE ME&O Tactics and Strategies*



\*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; and
  - Number of customers opting to cancel program participation.
- CS-GT<sup>2</sup>
  - 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 MCE's DAC communities;
  - Direct mail and email - email click-through and open rates;

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<sup>2</sup> MCE anticipates CS-GT will launch in 2024. To the extent that marketing efforts begin in late 2023 in preparation for launch, MCE will design its ME&O efforts to align with these metrics.



- Indirect website visits and page views, social media engagement and impressions; and
- 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 lead MCE to alter its strategy to improve its effectiveness.