



# 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Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: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 correspondence regarding this AL are to be sent via email and are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

California Public Utilities Commission  
Energy Division Tariff Unit Email:  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Contact Name:  
Title:  
Utility/Entity Name:  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Contact Name:  
Title:  
Utility/Entity Name:  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

CPUC  
Energy Division Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

## 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	



MARIN COUNTY | NAPA COUNTY | UNINCORPORATED CONTRA COSTA COUNTY | UNINCORPORATED SOLANO COUNTY  
BENICIA | CONCORD | DANVILLE | EL CERRITO | FAIRFIELD | LAFAYETTE | MARTINEZ | MORAGA | OAKLEY  
PINOLE | PITTSBURG | PLEASANT HILL | RICHMOND | SAN PABLO | SAN RAMON | VALLEJO | WALNUT CREEK

August 29, 2022

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

### **MCE Advice Letter 64-E**

**Re: Notice of Marin Clean Energy Home Energy Report Program Closure**

#### **Purpose**

Pursuant to California Public Utilities Commission (“Commission” or “CPUC”) Decision (“D.”) D.21-05-031, Marin Clean Energy (“MCE”) hereby submits the following Advice Letter (“AL”) to notify the Commission of MCE’s request to close the Home Energy Report (HER) program as AL-64-E.

#### **Tier Designation**

This AL has a Tier 2 designation pursuant to Ordering Paragraph (“OP”) 12 of D.21-05-031.

#### **Effective Date**

Pursuant to G.O. 96-B and D.21-05-031, MCE respectfully requests that this Tier 2 AL be approved pending Energy Division disposition effective September 30, 2022, 32 days from the date filed.

#### **Background**

The Commission authorized MCE’s HER program in D.18-05-041. MCE issued a request for proposals (“RFP”) consistent with Commission guidance to implement its HER program on March 5, 2019. MCE received five bids and contracted with Bidgely as the implementer. MCE expanded its existing contract with Recurve, already under contract with MCE for complementary services, to include serving as the HER program’s measurement and verification implementer.

MCE launched the HER program on May 21, 2020, to just over 79,000 residential customers. From 2020 to 2022, MCE undertook efforts and program modifications with implementers to improve program performance and deliver energy savings. After evaluating the program’s

performance in 2021 and again in 2022, MCE determined the program was not driving sufficient energy savings and decided to pursue program closure.

MCE followed the guidelines provided by Commission staff on December 31, 2021, including the following requirements:

- MCE notified program implementer Bidgely, of the intended program closure on July 7, 2022; MCE notified Recurve the following week of July 11, 2022, through July 15, 2022.
- MCE notified service lists R.13-11-005 and A.22-02-005 et al. of requested program closure on July 13, 2022, at least 45 days prior to the filing of this Advice Letter.
- MCE hosted a public webinar soliciting stakeholder input, detailing justifications for program closure and providing information on proposed next steps on August 9, 2022, 20 days prior to the filing of this Advice Letter.

## **Discussion**

### **A. Program Description**

MCE launched the Home Energy Program (“HER,” formerly Single-Family Comprehensive Program), to offer energy-saving behavior and education information to MCE residential participants. MCE’s programmatic goal was to provide long-term energy and dollar savings. The program sent bimonthly Home Energy Reports (“HERs”) to participants. The reports compared participants’ consumption to like customers and included an Energy Summary which provided disaggregated electricity information to allow participants to see which household appliances and units were using the most electricity.

The HER program also included a web-based portal, where participants could provide home-specific details to adjust Bidgely’s disaggregation algorithm for their property. Participants could document their home’s electricity consumption patterns, and learn about energy-saving programs, services, and reports. Participants could also contact MCE staff for assistance with any program-related questions through the portal. MCE contracted with Bidgely on a pay-for-performance basis, which minimized risks to MCE’s budget and ratepayers.

### **B. Justification for Closure**

MCE launched the HER program in May 2020, with a forecasted 1.57 Total Resource Cost (“TRC”) for year one. However, the program launched at the beginning of a multi-year global pandemic and MCE did not reach its expectations for savings in the first year. Initially MCE and the program implementers expected the initial savings to differ from forecasts since many MCE customers were spending more time at home consuming more electricity than previously.<sup>1</sup>. However, when the trend continued over several quarters, Bidgely took additional steps to improve program performance, and make the program more engaging to customers. For example, Bidgely revised the messaging sent to program participants using different terms, targeting messaging to

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<sup>1</sup> CPUC Energy Division, CPUC Workshop on COVID Impacts on Customers in Energy Sectors, (November 12, 2020) agenda available at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M349/K929/349929989.PDF>.

only specific appliances used on a regular basis by MCE’s residential customers, and using different subject-line language to enhance participant interest. Throughout the program, Bidgely solicited and tracked customer satisfaction among participants. Customer satisfaction was typically high, as evidenced by “likes,” “thumbs-up,” and positive survey feedback. Bidgely documented these responses and shared them with MCE in their monthly reports. However, despite program changes and relatively high customer satisfaction, the program did not achieve forecasted energy savings.

After further evaluating program performance and savings calculation methods, and in an additional effort to generate program savings, MCE approved adding participants to the program to reach a large population of MCE’s residential customers. While the program successfully reached a large proportion of MCE’s residential customers, it was not producing enough measurable energy savings to support its designation as a Resource Acquisition Program.

In July 2022, due to an extended period with insufficient energy savings, MCE decided to terminate the program.

C. Program Start Date

May 21, 2020.

D. Planned Program Sunset Date

August 31, 2022.

E. Previous Three Years Program Metrics

a. *Budget*

<b>Year</b>	<b>Budget</b>
2020	\$552,865
2021	\$443,238
2022	\$523,511

b. *Forecasted TRC and Savings*

<b>Year</b>	<b>TRC</b>	<b>Savings – (Net kWh)</b>	<b>TSB</b>
2020	1.57	4,072,319	N/A
2021	1.06	6,093,680	N/A
2022	.39	1,567,491	\$173,232

#### F. Previous Two Years Expenditures and Claimed Savings

##### a. *Budget Expenditures*

While the program was contracted for using a pay for performance contract and those costs were minimal, budget spend included a share of MCE Portfolio level expense, data management and Measurement and Verification (“M&V”) costs.

<b>Fiscal Year</b>	<b>Expenditures</b>
2019-2020	\$314,772
2020-2021	\$306,111

##### b. *Claimed TRC and Savings*

<b>Year</b>	<b>TRC</b>	<b>Savings – (Net kWh)</b>
2020	0.11	221,725
2021	0	0

#### G. Stakeholder Feedback

MCE hosted a public webinar *MCE Home Energy Report (HER) Program Closure* on August 9, 2022. 18 participants in addition to MCE staff attended. MCE provided the opportunity for stakeholder feedback and questions. MCE received clarifying questions on the decision to close the program and program evaluation next steps. MCE did not receive recommendations on program closure next steps.

#### H. Plans to Replace the Program

MCE does not plan to directly replace the Home Energy Reports program at this time. MCE administers a variety of residential energy efficiency programs. MCE additionally filed its *Application of Marin Clean Energy for Approval of 2024-2031 Energy Efficiency Business Plan and 2024-2027 Energy Efficiency Portfolio Plan* (“Application”) on March 09, 2022, in A.22-02-005. MCE’s Application proposes several residential program offerings.

#### **Notice**

MCE served a copy of this AL electronically on the official Commission service list for R.13-11-005 and A.22-02-005.

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

## **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 on August 29, 2022. Protests should be mailed to:

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

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

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

Mad Stano  
Policy Counsel  
MARIN CLEAN ENERGY  
1125 Tamalpais Avenue  
San Rafael, CA 94901  
Telephone: (415) 464-6024  
Email: [mstano@mcecleanenergy.org](mailto:mstano@mcecleanenergy.org)

Alice Havenar-Daughton  
Director of Customer Programs  
Marin Clean Energy  
1125 Tamalpais Ave.  
San Rafael, CA 94901  
Phone: (415) 464-6030  
[ahavenar-daughton@mceCleanEnergy.org](mailto:ahavenar-daughton@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 Mad Stano at (415) 464-6024 or by electronic mail at [mstano@mcecleanenergy.org](mailto:mstano@mcecleanenergy.org).

/s/ Mad Stano

Mad Stano  
Policy Counsel



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cc: Service List for R.13-11-005; A.22-02-005 et al.