



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: Marin Clean Energy (MCE)

Utility type:

☒ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Amulya Yerrapotu

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EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 69-E

Tier Designation: 2

Subject of AL: 2024 Budget Request and Marketing, Education and Outreach Plan for the Disadvantaged Communities Green Tariff and the Community Solar Green Tariff Programs

Keywords (choose from CPUC listing): COMPLIANCE

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☐ One-Time ☒ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: E-4999, E-5125

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: N/A

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

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: 5/3/23

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

¹Discuss 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

Contact Name: Amulva Yerrapotu
Title: Policy Associate
Utility/Entity Name: Marin Clean Energy

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Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
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Email:

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

Clear Form

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	



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April 3, 2023

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

MCE Advice Letter 69-E

RE: 2024 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-4999,¹ and OP 3 of Resolution E-5125,² 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”) 2024.

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 May 3, 2023, 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”),³ as

¹ 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.

² 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.

³ DACs are defined under Resolution E-5212 as communities that are identified in version 3.0 or any subsequent version of CalEnviroScreen as among the top 25 percent of census tracts statewide, plus 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 utility 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.⁴ 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 from May 2019 approved the investor-owned utilities’ (“IOUs”) implementation ALs for the DAC-GT and CS-GT programs and established the budgeting procedures and timelines for the programs. The Resolution sets the deadline for submitting annual DAC-GT and CS-GT program budget requests and ME&O plans for the upcoming PY by February 1st of each year.⁵ On January 24, 2023, MCE, as a part of the Joint CCAs, requested a two-month extension of the budget AL until April 3, 2023. On February 1, 2023, the Joint CCAs’ extension request was granted. Resolution E-4999 also provides details regarding the budget submission requirements and process. Furthermore, the Resolution specifies that Program Administrators must reconcile prior year budget forecasts and expenditures in their annual budget requests.⁶

Per D.18-06-027, the budget requirements outlined in Resolution E-4999 apply to participating CCAs as well. The submission and approval of this budget AL is the prerequisite of having the DAC-GT and CS-GT budgets included in the IOUs’ 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 2024 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 2022) and the budget forecast for the upcoming PY (i.e., PY 2024). Additionally, MCE includes two corrections for inadvertent errors in last year’s budget AL (MCE AL 58-E). In summary, MCE requests a total budget of \$809,170 for the DAC-GT and CS-GT programs for PY 2024. 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 2024 ERRA Forecast

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. Resolution E-5212 also expands program eligibility to include California Indian Country.

⁴ D.18-06-027, p. 104, OP 17.

⁵ Resolution E-4999, OP 2.

⁶ Resolution E-4999, OP 4.

filing, due on May 15th of 2023.⁷ 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-5124.⁸

In addition to the budget request, MCE submits its updated ME&O plan for PY 2024 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. MCE also request approval of its ME&O plan for 2024.

NOTICE

A copy of this AL is being served on the official Commission service lists for Rulemaking R.14-07-002 and Application A.22-05-022.

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.

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

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

Amulya Yerrapotu
Policy Associate

⁷ D.22-01-023, p. 28, OP 3. Modifies the due date for PG&E to file this annual Application to May 15, 2023.

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.

⁸ Resolution E-5124, p. 10.

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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 Amulya Yerrapotu at (415) 464-6664 or by electronic mail at ayerrapotu@mcecleanenergy.org.

/s/ Amulya Yerrapotu

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Appendices

Appendix A: PY 2024 Budget Request

Appendix B: PY 2024 ME&O Plan

cc: Service List for R.14-07-002 and A.22-05-022

**Budget Forecast for the Disadvantaged Communities Green
Tariff and Community Solar Green Tariff Programs for
Program Year 2024**

Proposed by Marin Clean Energy



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1. BACKGROUND

MCE is a program administrator (PA) of the Disadvantaged Communities (DAC) Green Tariff (DAC-GT) and Community Solar Green Tariff (CS-GT) programs. Per Resolution E-4999, annual program budgets must be presented by program and include the following budget line items:¹

1. Generation cost delta, if any;²
2. 20 percent bill discount for participating customers;
3. Program administration costs:³
 - a. Program management;
 - b. Information technology (IT);
 - c. Billing operations;
 - d. Regulatory compliance;
 - 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 this program budget, MCE includes both the budget reconciliation for the previous program year (PY) (i.e., PY 2022) and the budget forecast for the upcoming PY (i.e., PY 2024). Additionally, MCE includes a correction for an inadvertent error in calculating the actual program costs in last year's budget advice letter (AL) (MCE AL 58-E).

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

1. Existing solar generation capacity at previous PY's close (i.e., December 31, 2022);
2. Forecasted solar generation capacity under contract for procurement in the upcoming PY;
3. Customers served at previous PY's close (i.e., December 31, 2022); and
4. Forecasted customer enrollment for the upcoming PY.

¹ 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.

² 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."

³ Resolution E-5124 established that PG&E can charge "CCA Integration Costs" to the programs; i.e. costs that incur to PG&E to enable CCAs to administer the programs (e.g., billing support functions). To date, CCAs have been including CCA integration costs on their budget ALs. On March 2, 2023, PG&E submitted Advice Letter 6872-E requesting that the CPUC approve a tariff modification to allow PG&E to record these CCA integration costs directly to PG&E's subaccount, instead of the CCAs seeking cost recovery. Therefore, MCE does not include the CCA integration cost in its 2024 budget forecast. However, MCE still includes the CCA integration cost in the calculation of its administration cost cap, per Resolution E-5124.

Finally, MCE will submit the following workpapers to the California Public Utilities Commission's (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 2024

For PY 2024, MCE forecasts a total budget of \$1,387,822 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 2024

Tab	Category	DAC-GT	CS-GT
1	Generation Cost Delta	\$ 131,949	\$ -
2	20% Bill Discount	\$ 963,285	\$ -
	Program Administration		
3a	Program Management	\$ 35,964	\$ 19,980
3b	Information Technology	\$ 11,840	\$ 3,700
3c	Billing Operations	\$ 97,430	\$ 9,620
3d	Regulatory Compliance	\$ 11,750	\$ 11,750
3e	Procurement	\$ 27,710	\$ 25,876
	Subtotal Program Administration	\$ 184,694	\$ 70,926
	Marketing, Education & Outreach		
4a	Labor Costs	\$ 5,772	\$ 7,696
4b	Outreach and Material Costs	\$ 20,500	\$ 3,000
4c	Local CBO/ Sponsor Costs	\$ -	\$ -
	Subtotal ME&O	\$ 26,272	\$ 10,696
	Total	\$ 1,306,200	\$ 81,622
			\$ 1,387,822

MCE provides a brief description of each of the budget line items below.

Generation Cost Delta

To date, MCE has been using interim solar generation resources to support the DAC-GT program while it is procuring a dedicated solar facility for the program. On June 20, 2022, the Commission approved MCE's request to approve its dedicated DAC-GT power purchase agreement (PPA).⁴ MCE subsequently executed a contract with the dedicated solar generation facility that is expected to come online in late 2023 or early 2024. As such, the DAC-GT generation cost delta budget forecast for 2024 is based on the PPA price of the dedicated resource, compared to the costs of serving customers under MCE's residential base tariff, the "Light Green" tariff.

⁴ See Disposition of MCE AL 63-E, MCE Disadvantaged Communities Green Tariff Program 2022 Power Purchase Agreement Approval.

MCE did not receive any bids for CS-GT projects in its 2022 solicitation and does not expect to have a generation resource online in 2024 for the CS-GT program. Hence, MCE does not forecast any generation cost delta for 2024 for the CS-GT program.

20 Percent Bill Discount

As set forth in Resolution E-5124, MCE calculates the 20% bill discount on both the generation and transmission and distribution (T&D) portion of the electric bill for the customers participating in its programs. The bill discount is then fully included on the generation portion of customer bills, i.e., the discount reduces the electric generation costs of a customer's bill only.⁵ MCE then recovers these program costs via this budget AL filing.

In PY 2024, MCE only expects to have customers enrolled in the DAC-GT program. As described above, MCE has not been successful to date to procure a solar generation facility for the CS-GT program. The PY 2024 forecast for the 20 percent bill discount is based on the actual average monthly bill discount provided to participating customers in 2022, with a 25% increase to account for forecasted increases in electricity rates.

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 cover costs for ongoing billing operations and customer support, including the costs of MCE's third-party billing provider. 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, ongoing contract management, 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.⁶ 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 permitted PAs whose budgets exceed the established caps to submit a rationale supporting the exceedance in their Annual Budget Advice Letters (ABAL).⁷ The ABAL was elevated from Tier 1 to Tier 2 to allow

⁵ Resolution E-5124, p. 12.

⁶ Resolution E-4999, p. 27.

⁷ Resolution E-5125, p. 7.

for additional review of this and other ABAL components.⁸

The 2024 budget forecast summarized above in Table 1 results in program administration budgets of 14% for DAC-GT and 87% for CS-GT, and ME&O budgets of 2% for DAC-GT and 13% 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 2024. The factors contributing to these forecasts are described below.

2024 DAC-GT Program Administration Budget Forecast

Two main factors contribute to MCE exceeding the cost cap on administrative costs for the DAC-GT program. First and foremost, MCE continues to calculate and provide the bill discount to participating customers in a manual fashion, instead of an automated fashion as implemented under the IOUs' programs. Manual billing procedures are costly - they account for 52% of MCE's total administrative costs for the DAC-GT program. Without these manual billing costs, MCE would meet the cost cap with admin costs of 7% of the total DAC-GT budget. MCE has been advocating with the Commission for an automated billing solution to mitigate these annual billing costs.⁹ Until such an automated billing solution is implemented, the CCAs' administrative costs must be viewed differently than the IOU's administrative costs. The IOU PAs were able to recover the costs to implement an automated billing solution in the first two years of program operation, i.e., when the cost cap did not apply to the programs yet.¹⁰ Instead of incurring high IT and billing operations costs in the first two years of program implementation, the Joint CCAs will incur annual high billing costs throughout the duration of the program due to the manual nature of the billing solution for participating CCA customers.

A second factor contributing to MCE's relatively higher admin costs compared to previous years is the fact that MCE anticipates serving customers with a dedicated DAC-GT resource beginning in late 2023 or early 2024. This new resource is substantially less expensive than the interim resource currently supplying participating customers. As a result, the generation cost differential is reduced, making program administration costs a comparatively larger share of overall program expenses in 2024. Furthermore, as this new resource comes online, MCE anticipates additional procurement and program administration staff time to facilitate the integration of the new resource into the program. MCE anticipates that these will be one-time costs associated with the transition.

These factors, in conjunction with the relatively small capacity allocation assigned to MCE,¹¹ cause MCE's program administration budget forecast to exceed 10% of its total DAC-GT budget.

2024 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 in its PY 2024

⁸ *Id.*

⁹ A.22-05-022, Public Prepared Testimony on Behalf of the Joint Community Choice Aggregators and City and County of San Francisco, Joint Community Choice Aggregators and City and County of San Francisco, 1/20/23

¹⁰ Per PG&E AL 5750-E, PG&E recovered \$1,161,165 million for IT costs in 2019

¹¹ Per Resolution E-5124, MCE's capacity allocation for DAC-GT is 4.646 MW.

forecast. However, program administration costs are still being incurred, as MCE works to identify qualifying projects, create and refine administrative processes, engage in regulatory and compliance activities, and prepare to launch its program. These program costs therefore represent a large portion of the budget, with few other budget components to be compared against.

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,¹² 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.

2024 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 2024 (Appendix B), MCE anticipates incurring ME&O costs in 2024 as it will continue to work to identify qualifying projects for the CS-GT program. These factors contribute to a CS-GT ME&O forecast in excess of the established 4% cap.

4. BUDGET RECONCILIATION FOR PY 2022

MCE submitted a budget forecast for PY 2022 as a part of its 2022 Budget Request and Marketing, Education, and Outreach Plan in AL 47-E on February 1, 2021. The table below shows the forecasted and actual costs for PY 2022 per budget line item, as well as the true-up amount that will be carried forward to future program years.

¹² Per Resolution E-5124, MCE's capacity allocation for CS-GT is 1.2825 MW.

Table 2: MCE Budget Reconciliation for PY 2022

Tab	Category	DAC-GT			CS-GT		
		Forecast	Actual	True-up	Forecast	Actual	True-up
1	Generation Cost Delta	\$ 1,220,491	\$ 843,492	\$ 377,000	\$ -	\$ -	\$ -
2	20% Bill Discount	\$ 488,549	\$ 770,628	\$ (282,079)	\$ -	\$ -	\$ -
	Program Administration						
3a	Program Management	\$ 101,250	\$ 14,424	\$ 86,826	\$ 136,950	\$ 3,778	\$ 133,172
3b	Information Technology	\$ 40,604	\$ 7,212	\$ 33,392	\$ 22,007	\$ 1,889	\$ 20,118
3c	Billing Operations	\$ 37,342	\$ 66,762	\$ (29,420)	\$ 10,308	\$ 1,889	\$ 8,419
3d	Regulatory Compliance	\$ 14,280	\$ 6,911	\$ 7,369	\$ 14,280	\$ 4,402	\$ 9,878
3e	Procurement	\$ 18,235	\$ 34,280	\$ (16,045)	\$ 31,682	\$ 6,332	\$ 25,350
3f	CCA Integration Costs	\$ 31,014	\$ 3,941	\$ 27,074	\$ 31,014	\$ -	\$ 31,014
	Subtotal Program Administration	\$ 242,725	\$ 133,529	\$ 109,197	\$ 246,241	\$ 18,291	\$ 227,950
	Marketing, Education & Outreach						
4a	Labor Costs	\$ 18,445	\$ 1,002	\$ 17,443	\$ 54,740	\$ 258	\$ 54,482
4b	Outreach and Material Costs	\$ 2,800	\$ 13,410	\$ (10,610)	\$ 53,500	\$ -	\$ 53,500
4c	Local CBO/ Sponsor Costs	\$ -	\$ -	\$ -	\$ 25,000	\$ -	\$ 25,000
	Subtotal ME&O	\$ 21,245	\$ 14,412	\$ 6,833	\$ 133,240	\$ 258	\$ 132,982
	Total	\$ 1,973,011	\$ 1,762,060	\$ 210,950	\$ 379,481	\$ 18,548	\$ 360,932

5. CORRECTION OF 2021 ACTUAL COSTS

While preparing its 2024 Budget Advice Letter, MCE noticed and corrected an inadvertent error in its calculation of the 2021 Actual Generation Cost Delta for the DAC-GT program. MCE AL 58-E incorrectly reported the 2021 Actual Generation Cost Delta as \$151,027. After correcting the error, MCE's 2021 Actual Generation Cost Delta is \$145,521. The difference in cost delta amounts to \$5,506.

MCE also noticed and corrected an inadvertent error in its 2021 budget reconciliation. In MCE AL 58-E, the CS-GT forecasted CCA integration costs of \$1,263 are incorrectly excluded from the true-up, and therefore the reconciliation total.

MCE submits these corrections as a separate line item in its 2024 Budget Request in Section 6.

6. 2024 BUDGET REQUEST

Based on the budget forecast for PY 2024 presented in Section 2, the budget reconciliation for PY 2022 presented in section 4, and the correction for PY 2021 presented in section 5, MCE is requesting a total budget of \$809,170 for the DAC-GT and CS-GT programs in this budget AL.

Table 3: MCE Budget Request for PY 2024

	DAC-GT	CS-GT	Total
Budget Carry-over from PY 2022	\$ (210,950)	\$ (360,932)	\$ (571,883)
Budget Forecast for PY 2024	\$ 1,306,200	\$ 81,622	\$ 1,387,822
Advice Letter 58-E Corrections	\$ (5,506)	\$ (1,263)	\$ (6,769)
TOTAL	\$ 1,089,744	\$ (280,573)	\$ 809,170

7. PROGRAM CAPACITY AND ENROLLMENT NUMBERS

MCE reports existing program capacity and customer enrollment numbers as of December 31, 2022 in Table 4 below. In PY 2022, 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 2022

Category	DAC-GT	CS-GT
Existing program capacity (MW)	4.646	0
Participating customers (#)	3,265	0

In Table 5, MCE reports forecasted capacity and customer enrollment for PY 2024. As noted above, MCE is currently in contract negotiations for a dedicated solar project to support DAC-GT, and 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 2022, MCE does not anticipate launching a CS-GT program and enrolling customers in 2024. Therefore, MCE does not have any forecasted program capacity under contract for 2024.

Table 5: Forecasted Program Capacity and Enrollment Count for DAC-GT and CS-GT for PY 2024

Category	DAC-GT	CS-GT
Estimated capacity to be procured (MW)	4.646	0
Estimated customer enrollment (#)	3,265	0

**Marketing, Education and Outreach Plan for the Disadvantaged
Communities Green Tariff and Community Solar Green Tariff
Programs for Program Year 2024**
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 2025);
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)¹

After its initial enrollment for the DAC-GT program, which prioritized customers in arrears who have made payments, there was additional capacity for the program. MCE then enrolled customers enrolled in CARE or FERA in 90th percentile DACs. As capacity becomes available, MCE continues to enroll all CARE/FERA customers living in 90th percentile DACs, with priority given to those who have been on the waitlist for the greatest amount of time.

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

¹ MCE has the capacity to serve approximately 3,265 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 3.0 and any subsequent versions. 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 under CalEnviroScreen 3.0

Census Tract	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
6013382000	Contra Costa	94804	Richmond
6013368002	Contra Costa	94806	San Pablo
6013376000	Contra Costa	94801	Richmond
6013310000	Contra Costa	94565	Pittsburg
6013311000	Contra Costa	94565	Pittsburg
6095250701	Solano	94590	Vallejo
6013305000	Contra Costa	94509	Antioch
6013380000	Contra Costa	94804	Richmond
6013375000	Contra Costa	94801	Richmond
6095250801	Solano	94592	Vallejo
6013366002	Contra Costa	94806	San Pablo
6095250900	Solano	94590	Vallejo
6013368001	Contra Costa	94806	San Pablo
6013358000	Contra Costa	94572	Rodeo
6013381000	Contra Costa	94804	Richmond
6013314103	Contra Costa	94565	Pittsburg
6013320001	Contra Costa	94553	Martinez
6013314104	Contra Costa	94565	Pittsburg
6013313102	Contra Costa	94565	Pittsburg
6013309000	Contra Costa	94565	Pittsburg
6013313101	Contra Costa	94565	Pittsburg

6013364002	Contra Costa	94806	San Pablo
6013392200	Contra Costa	94806	San Pablo
6095251802	Solano	94589	Vallejo
6013302005	Contra Costa	94561	Oakley
6095251901	Solano	94589	Vallejo

Figure 3. Qualifying Neighborhoods in MCE Service Area for CS-GT under CalEnviroScreen 4.0

Census Tract	County	Zip	Nearby City (to help approximate location only)
6095250701	Solano	94590	Vallejo
6013365002	Contra Costa	94801	Richmond
6013377000	Contra Costa	94801	Richmond
6013376000	Contra Costa	94801	Richmond
6013379000	Contra Costa	94804	Richmond
6013382000	Contra Costa	94804	Richmond
6095250900	Solano	94590	Vallejo
6013305000	Contra Costa	94509	Antioch
6095250801	Solano	94592	Vallejo
6013312000	Contra Costa	94565	Pittsburg
6013375000	Contra Costa	94801	Richmond
6013311000	Contra Costa	94565	Pittsburg
6095251802	Solano	94589	Vallejo
6013366002	Contra Costa	94806	San Pablo
6013310000	Contra Costa	94565	Pittsburg
6013381000	Contra Costa	94804	Richmond
6013392200	Contra Costa	94806	San Pablo
6013358000	Contra Costa	94572	Rodeo
6095252402	Solano	94534	Fairfield
6013314104	Contra Costa	94565	Pittsburg
6013368001	Contra Costa	94806	San Pablo
6013327000	Contra Costa	94520	Concord

6013309000	Contra Costa	94565	Pittsburg
6095253500	Solano	94571	Rio Vista
6095251902	Solano	94589	Vallejo
6013368002	Contra Costa	94806	San Pablo
6013369001	Contra Costa	94806	San Pablo
6095251901	Solano	94589	Vallejo
6095251000	Solano	94590	Vallejo
6013307102	Contra Costa	94509	Antioch
6013314200	Contra Costa	94565	Pittsburg
6013306003	Contra Costa	94509	Antioch
6013380000	Contra Costa	94804	Richmond
6095251803	Solano	94589	Vallejo
6013336201	Contra Costa	94520	Concord
6095251600	Solano	94590	Vallejo
6013314103	Contra Costa	94565	Pittsburg
6013314102	Contra Costa	94565	Pittsburg
6013306002	Contra Costa	94509	Antioch

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 2025. 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 2024. 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 and grant programs 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-GT²
 - 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;

² MCE anticipates CS-GT will launch in 2025. To the extent that marketing efforts begin in late 2024 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.