California Public Utilities Commission

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: Contact Person: Amulya Yerrapotu ELC GAS WATER PLC HEAT HEAT Contact Person: Amulya Yerrapotu Phone #: 415-464-6664 E-mail: averrapotu@mcecleanenergy.org E-mail Disposition Notice to: averrapotu@mcecleanenergy.org						
EXPLANATION OF UTILITY TYPE ELC = Electric GAS = Gas WATER = Water PLC = Pipeline HEAT = Heat	(Date Submitted / Received Stamp by CPUC)					
Advice Letter (AL) #: 86-E	Tier Designation: 2					
Green Tariff Program	g, Education and Outreach Plan for the Disadvantaged Communities					
Keywords (choose from CPUC listing): COMPLE						
AL Type: Monthly Quarterly Annue If AL submitted in compliance with a Commissi	al 🔽 One-Time 🔄 Other: on order, indicate relevant Decision/Resolution #:					
D.24-05-065,						
Does AL replace a withdrawn or rejected AL? I	f so, identify the prior AL: $_{ m N/A}$					
Summarize differences between the AL and the prior withdrawn or rejected AL: $\mathrm{N/A}$						
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: $5/1/25$	No. of tariff sheets: $_0$					
Estimated system annual revenue effect (%): $_{ m N}$	I/A					
Estimated system average rate effect (%): N/A	L .					
When rates are affected by AL, include attach (residential, small commercial, large C/I, agricu	nment in AL showing average rate effects on customer classes ultural, lighting).					
Tariff schedules affected: N/A						
Service affected and changes proposed1: $_{ m N}/A$	Λ					
Pending advice letters that revise the same tar	_					

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:

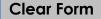
California Public Utilities Commission Energy Division Tariff Unit Email: EDTariffUnit@cpuc.ca.gov Contact Name: Amulva Yerrabotu Title: Policy Analyst Utility/Entity Name: Marin Clean Energy

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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	

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April 1, 2025

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

MCE Advice Letter 86-E

RE: 2026 Budget Request and Marketing, Education and Outreach Plan for the Disadvantaged Communities Green Tariff Program

Pursuant to Ordering Paragraphs ("OP") 2 and 4 of Resolution E-4999,¹ OP 3 of Resolution E-5125,² and OPs 2 and 3 of D.24-05-065,³ 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) program for the program year ("PY") 2026.

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 1, 2025, 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

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 OP 2 of D.24-05-065 discontinues the CS-GT program and directs program administrators to transfer remaining capacity, customers, and programs into the DAC-GT program. OP 3 of D.24-05-065 makes several modifications to the DAC-GT program, which are reflected in this budget submission.

renewable generation among residential customers in disadvantaged communities ("DACs"),⁴ as directed by the California Legislature in Assembly Bill ("AB") 327 (Perea), Stats. 2013, ch 611. The DAC-GT and the CS-GT programs offer 100% solar energy to eligible customers and provide 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.⁵ 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.⁶ Furthermore, the Resolution specifies that Program Administrators must reconcile prior year budget forecasts and expenditures in their annual budget requests.⁷ On December 4, 2023, MCE, as a part of the Joint CCAs, requested a two-month extension of the budget AL until April 1, 2023. On January 11, 2024, MCE, as a part of the Joint CCAs, amended the extension request to align with the IOUs, requesting an extension until May 1, 2024, or 30 days after the issuance of the Final Decision in proceeding A.22-05-022, whichever is later. On January 24, 2024, the Joint CCAs' extension request was granted. The Final Decision in proceeding A.22-05-022 was issued on June 7, 2024.⁸

On May 30, 2024, the CPUC approved D.24-05-065, discontinuing the CS-GT program and approving a number of modifications to the DAC-GT program. The DAC-GT program modifications pertaining to CCA program administrators include: modifying project siting requirements, increasing program capacity, allowing the voluntarily inclusion of storage in projects, ordering the cost containment cap to be updated, changing the budget advice letter deadline to April 1st, and removing the Green-e certification requirement.

On September 27, 2024, MCE submitted its updated tariff documents for the DAC-GT program. On November 15, 2024, the CPUC approved MCE's revised DAC-GT tariff with an effective date of October 27, 2024.

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 to having the

⁴ 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 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.

⁵ D.18-06-027, p. 104, OP 17.

⁶ Resolution E-4999, OP 2.

⁷ Resolution E-4999, OP 4.

⁸ D.24-05-065

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 of the programs. Therefore, MCE is submitting this advice letter to ensure timely cost recovery for its programs.

PURPOSE

MCE hereby submits the budget request for PY 2026 for the DAC-GT program. Per Resolution E-4999, the budget request includes both the budget reconciliation for the previous PY (i.e., PY 2024) and the budget forecast for the upcoming PY (i.e., PY 2026). Additionally, MCE includes two corrections for inadvertent errors in last year's budget AL (MCE AL 79-E). Because D.24-05-065 closed the CS-GT program for future procurement and MCE has not already procured a project for the CS-GT program, MCE does not include CS-GT in the PY 2026 budget forecast. However, MCE continues to include CS-GT program costs in the PY 2024 budget reconciliation until the point of program closure upon issuance of D.24-05-065. In summary, MCE requests a total budget of \$1,972,742 for the DAC-GT program for PY 2026, including corrections from MCE AL 79-E and PY 2024 DAC-GT and CS-GT reconciliation costs. 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 program in the 2026 ERRA Forecast filing.⁹ 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 balancing account. PG&E will then transfer program funds to MCE as determined in Resolution E-5124.¹⁰

In addition to the budget request, MCE submits its updated ME&O plan for PY 2026 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 requests approval of its ME&O plan for 2026.

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 <u>Process_Office@cpuc.ca.gov</u>.

⁹ D.22-01-023, p. 28, OP 3. Modifies the due date for PG&E to file this annual Application to May 15, 2023. Because D.24-05-065 was not voted on until May 30, 2024, pushing this advice letter filing to July 8th, 2024 PG&E may need to include an updated budget in its October ERRA forecast update.

¹⁰ Resolution E-5124, p. 10.

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 Analyst Marin Clean Energy 1125 Tamalpais Ave San Rafael, CA 94901 Email: ayerrapotu@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 Amulya Yerrapotu at (925) 378-6729 or by electronic mail at <u>averrapotu@mcecleanenergy.org</u>.

/s/ Amulya Yerrapotu

Amulya Yerrapotu Policy Analyst MARIN CLEAN ENERGY 1125 Tamalpais Avenue San Rafael, CA 94901 Telephone: (925) 378-6729 Email: ayerrapotu@mcecleanenergy.org

Appendices

Appendix A: PY 2026 Budget Request Appendix B: PY 2026 ME&O Plan cc: Service List for R.14-07-002 and A.22-05-022

MCE Advice Letter 86-E 5

Budget Forecast for the Disadvantaged Communities Green Tariff Program for Program Year 2026

Proposed by Marin Clean Energy



TABLE OF CONTENTS

1.	BACKGROUND	3
2.	BUDGET FORECAST FOR PY 2026	4
3.	BUDGET CAPS	6
4.	BUDGET RECONCILIATION FOR PY 2024	6
5.	CORRECTION OF MCE AL 79-E 2023 ACTUAL BILL DISCOUNT COSTS	8
6.	2026 BUDGET REQUEST	8
7.	PROGRAM CAPACITY AND ENROLLMENT NUMBERS	8

TABLE OF FIGURES

Table 1: MCE Budget Forecast for PY 2026	4
Table 2: MCE Budget Reconciliation for PY 2024	8
Table 3: MCE Budget Request for PY 2026	9
Table 4: Program Capacity and Enrollment Count for DAC-GT and CS-GT for PY 2024	9
Table 5: Forecasted Program Capacity and Enrollment Count for DAC-GT and CS-GT for PY2026	9

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 2024) and the budget forecast for the upcoming PY (i.e., PY 2026). As D.24-05-065 closes the CS-GT program for future procurement and MCE has not already procured a CS-GT project, MCE does not include CS-GT program costs for PY 2026, and only includes CS-GT costs in the budget reconciliation for PY 2024 until program closure.

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 79-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, 2024);

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 2025 budget forecast. However, MCE still includes the CCA integration cost in the calculation of its administration cost cap, per Resolution E-5124.

- 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, 2024); and
- 4. Forecasted customer enrollment for the upcoming PY.

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 2026

For PY 2026, MCE forecasts a total budget of \$2,902,368 for the DAC-GT program. This budget forecast accounts for the program modifications established in D.24-05-065, including discontinuing the CS-GT program and rolling unused capacity into the DAC-GT program, increasing DAC-GT program capacity, and removing the Green-e certification requirement. A detailed budget forecast for each program by budget line item can be found in the table below.

Tab	Category	DAC-GT
1	Generation Cost Delta	\$ 921,536
2	20% Bill Discount	\$ 1,679,692
	Program Administration	
3a	Program Management	\$ 115,280
3b	Information Technology	\$ 13,635
3c	Billing Operations	\$ 100,065
3d	Regulatory Compliance	\$ 18,678
3e	Procurement	\$ 14,620
	Subtotal Program Administration	\$ 262,278
	Marketing, Education & Outreach	
4a	Labor Costs	\$ 10,382
4b	Outreach and Material Costs	\$ 28,480
	Subtotal ME&O	\$ 38,862
	Total	\$ 2,902,368

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

granted MCE's request to approve its dedicated DAC-GT power purchase agreement (PPA).⁴ On November 11, 2024, the Commission approved MCE's first request to amend its dedicated DAC-GT PPA. On June 19, 2024, the Commission approved MCE's second request to amend its dedicated DAC-GT PPA. The new dedicated solar generation facility is expected to come online in early 2026.

Decision 24-05-065 approves a 50% expansion of MCE's DAC-GT program capacity. Decision 24-05-065 also rolls any unused CS-GT capacity into MCE's DAC-GT program. MCE's DAC-GT program now has a total capacity of 8.249 MW. MCE plans to enroll new customers using an interim resource as it works to procure a resource to serve the remaining program capacity. MCE anticipates using the existing DAC-GT interim resource for this purpose.

As such, the DAC-GT generation cost delta budget forecast for the first three months of 2026 is based on the PPA price of the current interim solar generation resource, compared to the costs of serving customers under MCE's residential base tariff, the "Light Green" tariff. For the remainder of 2026, after the new dedicated solar resource comes online, the DAC-GT generation cost delta for customers enrolled under the original DAC-GT capacity is based on the PPA price of the new dedicated solar generation resource. The DAC-GT generation cost delta for customers enrolled under the original bac-GT generation cost delta for customers enrolled under the expanded DAC-GT capacity continues to be based on the PPA price of the current interim solar generation resource.

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 participating customers. 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 2026, MCE expects to have approximately 5,805 customers enrolled in the DAC-GT program. D.24-05-065 expands MCE's DAC-GT program capacity by 3.609 MW. MCE estimates that it will be able to serve 2,540 customers with this new capacity, in addition to the existing 3,265 customers currently served by existing program capacity. MCE plans to enroll customers using an interim resource as it works to procure a new resource to serve the remaining program capacity. The PY 2026 forecast for the 20 percent bill discount is based on the actual average monthly bill discount provided to participating customers in 2024, with a 25% increase to account for forecasted increases in electricity rates. Future customers enrolled under the expanded capacity are assumed to have the same usage as existing customers.

Program Administration Costs

Program administration 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. While D.24-05-065

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

⁵ Resolution E-5124, p. 12.

directs PG&E to provide a cost estimate for implementing an automated billing solution, it is uncertain whether such a solution will be implemented. As such, for the time being, MCE assumes that billing costs will remain as they are now. Regulatory Compliance 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. D.24-05-065 removes the Green-e certification requirement, instead ordering program administrators to independently track the retirement of RECs. MCE estimates those costs in the procurement forecast.

Marketing, Education and Outreach (ME&O)

ME&O budgets are split in two categories -(1) MCE labor costs; and (2) MCE direct costs for outreach and material.

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 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 for additional review of this and other ABAL components.⁸

The 2026 budget forecast summarized above in Table 1 results in DAC-GT program administration budgets of 9% and ME&O budgets of 1%. As such, MCE does not require an adjustment to the program administration budget cap for DAC-GT for PY 2026.

4. BUDGET RECONCILIATION FOR PY 2024

MCE submitted a budget forecast for PY 2024 as a part of its 2024 Budget Request and Marketing, Education, and Outreach Plan in AL 69-E on April 3, 2023. The table below shows the forecasted and actual costs for PY 2024 per budget line item, as well as the true-up amount that will be carried forward to future program years.

⁶ Resolution E-4999, p. 27.

⁷ Resolution E-5125, p. 7.

⁸ Id.

Tab	Category		DAC-GT CS-GT			CS-GT						
					Trι	ue-up (Actual -					Tr	ue-up (Actual -
		Forecast		Actual		Forecast)		Forecast		Actual		Forecast)
1	Generation Cost Delta	\$ 988,083	\$	561,365	\$	(426,718)	\$	-	\$	-	\$	-
2	20% Bill Discount	\$ 280,035	\$	755,851	\$	475,816	\$	-	\$	-	\$	-
	Program Administration											
3a	Program Management	\$ 84,050	\$	12,281	\$	(71,769)	\$	97,150	\$	12,281	\$	(84,869)
3b	Information Technology	\$ 30,537	\$	6,240	\$	(24,297)	\$	19,009	\$	6,240	\$	(12,769)
3c	Billing Operations	\$ 76,735	\$	90,991	\$	14,256	\$	34,422	\$	6,141	\$	(28,281)
3d	Regulatory Compliance	\$ 7,860	\$	22,365	\$	14,505	\$	7,860	\$	12,991	\$	5,131
3e	Procurement	\$ 26,815	\$	28,100	\$	1,285	\$	31,093	\$	786	\$	(30,307)
3f	CCA Integration Costs	\$ -	\$	-	\$	-	\$	-	\$	-	\$	-
	Subtotal Program Administration	\$ 225,997	\$	159,976	\$	(66,021)	\$	189,534	\$	38,439	\$	(151,096)
	Marketing, Education & Outreach											
4a	Labor Costs	\$ 21,615	\$	3,220	\$	(18,395)	\$	59,605	\$	2,260	\$	(57,345)
4b	Outreach and Material Costs	\$ 20,000	\$	15,969	\$	(4,031)	\$	26,000	\$	-	\$	(26,000)
	Subtotal ME&O	\$ 41,615	\$	19,189	\$	(22,426)	\$	85,605	\$	2,260	\$	(83,345)
	Total	\$ 1,535,730	\$	1,496,382	\$	(39,348)	\$	275,139	\$	40,698	\$	(234,441)

Table 2:	MCE .	Budget	Reconciliation	for	PY 2024	4

5. CORRECTION OF MCE AL 79-E 2023 ACTUAL BILL DISCOUNT COSTS

While preparing its 2025 Budget Advice Letter, MCE discovered and corrected an inadvertent error in the calculation of the 2023 Actual Bill Discount Cost for the DAC-GT program. MCE AL 79-E incorrectly reported the 2023 Actual Bill Discount Cost as \$1,489,780. After correcting the error, MCE's 2023 Actual Bill Discount Cost is \$833,942. The difference in the actual bill discount costs amounts to \$655,837.

MCE submits this correction to MCE AL 79-E as a separate line item in its 2026 Budget Request in Section 6.

As the calculation for the 2025 Forecast Bill Discount Cost is based on the 2023 Actual Bill Discount Cost, MCE AL 79-E also overestimates the 2025 Bill Discount Forecast. By design of the DAC-GT program, any unused funds due to this inadvertent overestimation will be returned in next year's budget advice letter when the Actual 2025 Bill Discount Cost is reconciled with the 2025 Forecast Bill Discount Cost.

6. 2026 BUDGET REQUEST

Based on the budget forecast for PY 2026 presented in Section 2, the budget reconciliation for PY 2024 presented in section 4, and the corrections to MCE AL 79-E presented in Section 5, MCE is requesting a total budget of \$1,972,742 for the DAC-GT and CS-GT programs in this budget AL.

	DA	C-GT	CS-0	GT	Tota	al
Budget Carry-over from PY 2024	\$	(39,348)	\$	(234,441)	\$	(273,789)
Budget Forecast for PY 2026	\$	2,902,368	\$	-	\$	2,902,368
Correction to MCE AL 79-E	\$	(655 <i>,</i> 837)	\$	-	\$	(655 <i>,</i> 837)
TOTAL	\$	2,207,183	\$	(234,441)	\$	1,972,742

Table 3: MCE Budget Request for PY 2026

7. PROGRAM CAPACITY AND ENROLLMENT NUMBERS

MCE reports existing program capacity and customer enrollment numbers as of December 31, 2024, in Table 4 below. In PY 2024, 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 2024

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 2026. As noted above, MCE estimates that the dedicated project to serve existing DAC-GT will come online in early 2026. MCE plans to solicit a new project to serve the expanded DAC-GT capacity granted in D.24-05-065, but does not anticipate this project will come online during PY 2026. MCE plans to enroll additional customers under the expanded capacity using an interim resource until a new resource can be procured.

Table 5: Forecasted Program Capacity and Enrollment Count for DAC-GT and CS-GT for PY
2026

Category	DAC-GT
Existing program capacity (MW)	4.646
Additional program capacity to be procured (MW)	3.609
Total program capacity (MW)	8.249
Estimated customer enrollment (#)	5,805

Marketing, Education and Outreach Plan for the Disadvantaged Communities Green Tariff Programs for Program Year 2026 *Proposed by Marin Clean Energy*



TABLE OF CONTENTS

1.	PURPOSE AND GOALS	1
2.	GUIDING PRINCIPLES	1
3.	TARGET AUDIENCE	1
4.	ME&O TACTICS AND STRATEGIES	3
5.	Metrics Tracking	3

TABLE OF FIGURES

Figure 1. Qualifying Neighborhoods in MCE Service Area for DAC-GT Auto-Enrollment2	2
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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) program to ensure potential customers in disadvantaged communities (DACs) are aware of the benefits from the program.

MCE will develop and implement a targeted customer marketing, education, and outreach (ME&O) campaign for the DAC-GT program. 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.

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).

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 program. MCE aims to:

• Achieve diverse and meaningful engagement that reflects the demographics of DAC communities in MCE's service area to ensure equitable outreach across race, income and age barriers;

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 3.0. Priority was given to customers who made an effort to pay, as defined by at least 4 full or partial payments in the preceding 8 months. With the expanded capacity of the DAC-GT program, MCE will enroll additional customers as identified by CalEnviroScreen 4.0 in the following order:

1. Customers who live in one of the top 25% of DAC census tracts and are enrolled in the Arrearage Management Program (category 1);

- 2. Customers who live in one of the top 25% of DAC census tracts and are in arrears (category 2); and
- 3. All other customers who live in one of the top 25% of DAC census tracts (category 3).

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 selected for program enrollment using the categories listed above. MCE will monitor program attrition on a monthly basis and enroll additional customers from the waitlist as appropriate.

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

75% CalEnviroScreen 4.0 Score							
Census Tract	California County	ZIP	Nearby City (to help approximate location only)				
6013305000	Contra Costa	94509	Antioch				
6013306002	Contra Costa	94509	Antioch				
6013306003	Contra Costa	94509	Antioch				
6013307102	Contra Costa	94509	Antioch				
6013306002	Contra Costa	94509	Antioch				
6013327000	Contra Costa	94520	Concord				
6013336201	Contra Costa	94520	Concord				
6013309000	Contra Costa	94565	Pittsburg				
6013310000	Contra Costa	94565	Pittsburg				
6013311000	Contra Costa	94565	Pittsburg				
6013312000	Contra Costa	94565	Pittsburg				
6013314102	Contra Costa	94565	Pittsburg				
6013314103	Contra Costa	94565	Pittsburg				
6013314104	Contra Costa	94565	Pittsburg				
6013314200	Contra Costa	94565	Pittsburg				
6013314103	Contra Costa	94565	Pittsburg				
6013314102	Contra Costa	94565	Pittsburg				
6013365002	Contra Costa	94801	Richmond				
6013375000	Contra Costa	94801	Richmond				
6013376000	Contra Costa	94801	Richmond				
6013377000	Contra Costa	94801	Richmond				
6013379000	Contra Costa	94804	Richmond				
6013380000	Contra Costa	94804	Richmond				
6013381000	Contra Costa	94804	Richmond				
6013382000	Contra Costa	94804	Richmond				
6013358000	Contra Costa	94572	Rodeo				

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

6013366002	Contra Costa	94806	San Pablo
6013368001	Contra Costa	94806	San Pablo
6013368002	Contra Costa	94806	San Pablo
6013369001	Contra Costa	94806	San Pablo
6013392200	Contra Costa	94806	San Pablo
6095250701	Solano	94590	Vallejo
6095250801	Solano	94592	Vallejo
6095250900	Solano	94590	Vallejo
6095251000	Solano	94590	Vallejo
6095251600	Solano	94590	Vallejo
6095251802	Solano	94589	Vallejo
6095251803	Solano	94589	Vallejo
6095251901	Solano	94589	Vallejo

4. ME&O TACTICS AND STRATEGIES

MCE will continue to use the communications and media content originally developed to promote DAC-GT, including direct mailers, email, and a webpage.

5. METRICS TRACKING

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

- Number of customers enrolled based on auto-enrollment criteria;
- Number of customers found to be ineligible for the program based on eligibility criteria;
- Number of customers opting to cancel program participation; and
- Number of customers to be enrolled from the waitlist based on the capacity provided through the total sum of all aforementioned attributes.