



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: Sabrinna Soldavini

Phone #: 415-464-6658

E-mail: Ssoldavini@mccleanenergy.org

E-mail Disposition Notice to: Ssoldavini@mccleanenergy.org

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 87-E

Tier Designation: 2

Subject of AL: Program Administration Budget Request for the Percentage of Income Pilot Program

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-5200, D.21-10-012,

Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: N/A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: 5/15/25

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: Sabrina Soldavini
Title: Director of Policy
Utility/Entity Name: Marin Clean Energy

Telephone (xxx) xxx-xxxx: 415-464-6658
Facsimile (xxx) xxx-xxxx:
Email: ssoldavini@mcecleanenergy.org

Contact Name: MCE Regulatory
Title: Regulatory Account
Utility/Entity Name: Marin Clean Energy

Telephone (xxx) xxx-xxxx: N/A
Facsimile (xxx) xxx-xxxx: N/A
Email: regulatory@mcecleanenergy.org

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
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	



April 15th, 2025

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

MCE Advice Letter 87-E

RE: Program Administration Budget Request for the Percentage of Income Pilot Program

Pursuant to Ordering Paragraph (“OP”) 6 of Resolution E-5200,¹ Marin Clean Energy (“MCE”) hereby submits this Tier 2 Advice Letter (“AL”) to seek approval for cost recovery for incremental administrative costs incurred to date for the implementation of the Percentage of Income Payment Plan (“PIPP”) pilot program.

TIER DESIGNATION

Pursuant to OP 6 of Resolution E-5200, this AL has a Tier 2 designation.

EFFECTIVE DATE

Pursuant to G.O. 96-B, MCE requests that this Tier 2 AL become effective on May 15, 2025, which is 30 calendar days from the date of this filing.

BACKGROUND

On October 7, 2021, the California Public Utilities Commission (“Commission” or “CPUC”) approved D.21-10-012, authorizing PIPP pilot programs to reduce residential disconnections of electric and gas service. The PIPP pilot program sets a participant’s monthly bill cap for electricity and gas charges at four percent of their household’s monthly income.

D.21-10-012 allows Community Choice Aggregators (“CCAs”) to participate in the PIPP pilot program so long as the CCA is also participating in, or intends to participate in, the Arrearage Management Program (“AMP”). The Investor-Owned Utilities track bundled and unbundled electricity subsidy costs and remit the generation portion of electric subsidy costs to the participating CCA monthly. Pursuant to OP 3 of D.21-10-012, MCE jointly filed Tier 3 advice letter MCE AL 59-E on February 4, 2022, with Pacific Gas & Electric (“PG&E”) and other

¹ OP 6 of Resolution E-5200 orders Community Choice Aggregators that incur incremental administrative costs that are not recorded in the Investor-Owned Utilities Percentage of Income Payment Plan Memorandum Accounts to each file a Tier 2 Advice Letter to seek approval for cost recovery within 30 days after the Percentage of Income Payment Plan evaluation report is published.

participating CCAs in PG&E’s service area to propose a target enrollment level, eligible high disconnection zip codes, a marketing, education, and outreach plan, and a proposed budget. The Commission approved MCE AL 59-E on December 15, 2022 with Resolution E-5200.

Resolution E-5200 directs participating CCAs that incur incremental administrative costs that are not recorded in an IOU PIPP Memorandum Account to each file a Tier 2 AL within 30 days after the PIPP Evaluation report is published. Incremental administrative costs are defined in D.21-10-012 as costs “incurred solely for the purpose of implementing the PIPP pilots and do not include costs that would have been incurred in the course of administering the CARE program or other existing responsibilities of the utilities or CCAs”.

The PIPP pilot program final evaluation report was published on March 17, 2025. Accordingly, MCE hereby submits this advice letter to ensure timely cost recovery for the administrative costs incurred thus far in implementing the PIPP pilot program.

PURPOSE

MCE hereby submits this cost recovery request for administrative expenses incurred thus far for the PIPP pilot program. Per D.21-10-012 and Resolution E-5200, MCE is requesting cost recovery for costs incurred from July 1, 2023 to April 1, 2025 solely for the purpose of implementing the PIPP pilots. MCE anticipates submitting another Tier 2 advice letter at the conclusion of the PIPP Pilot Program, in July of 2027, to request cost recovery for program administration costs incurred during the remainder of the pilot duration.

In total, MCE requests cost recovery for the \$73,996 spent on PIPP pilot program administration from July 1, 2023 to April 1, 2025. MCE provides greater detail on the program budget request in the figure below.

Figure 1: MCE PIPP Program Administration Cost Recovery Request

Category	2023	2024	2025	Total
Program Management	\$ 2,856	\$ 5,712	\$ 1,428	\$ 9,996
Billing Operation	\$ 41,500	\$ 18,000	\$ 4,500	\$ 64,000
Total	\$ 44,356	\$ 23,712	\$ 5,928	\$ 73,996

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

Program Management

Program management covers labor costs incurred in administering the PIPP pilot program.

Billing Operation

Billing operations includes both one-time startup costs and ongoing maintenance costs charged by SMUD, MCE’s billing service provider, for administration of the PIPP pilot program.

CONCLUSION

MCE respectfully requests the Commission approve the cost recovery proposed herein and direct PG&E to transfer funds sufficient to meet MCE's approved program administration budget.

NOTICE

A copy of this AL is being served on the official Commission service lists for Rulemaking R.18-07-005.

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:

Sabrina Soldavini
Director of Policy
Marin Clean Energy
1125 Tamalpais Ave
San Rafael, CA 94901
Email: ssoldavini@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 Sabrina Soldavini at (415) 464-6670 or by electronic mail at ssoldavini@mcecleanenergy.org.

/s/ Sabrina Soldavini

Sabrina Soldavini
Director of Policy
MARIN CLEAN ENERGY
1125 Tamalpais Avenue
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cc: Service List for R.18-07-005