PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298

East Bay Community Energy
ELC (Corp ID 201)
Status of Advice Letter 38E
As of January 12, 2023

Subject: East Bay Community Energy, Pacific Gas and Electric Company, and Bay Area Regional Energy Network Joint Cooperation Memorandum for Program Year 2023 Energy Efficiency Programs

Division Assigned: Energy

Date Filed: 12-13-2022

Date to Calendar: 12-16-2022

Authorizing Documents: E-5215

Disposition:	**Accepted**
Effective Date:	**01-12-2023**

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:
edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:
Michael Quiroz
510-641-0950
mquiroz@ebce.org

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298

To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

Advice Letter Number
Name of Filer
CPUC Corporate ID number of Filer
Subject of Filing
Date Filed
Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
Effective Date of Filing
Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

December 13, 2022

Advice Letter No. 38-E
(East Bay Community Energy ID 201)

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

Re: East Bay Community Energy, Pacific Gas and Electric Company, and Bay Area Regional Energy Network Joint Cooperation Memorandum for Program Year 2023 Energy Efficiency Programs

Purpose

Pursuant to Ordering Paragraph ("OP") 3 of Resolution E-5215, issued on September 15 2022[1], East Bay Community Energy ("EBCE") respectfully submits the Joint Cooperation Memorandum ("JCM") among itself, Pacific Gas and Electric Company ("PG&E") and Bay Area Regional Energy Network ("BayREN") as Advice Letter ("AL") EBCE 38-E, PG&E 6786-E, BayREN 22-E.

Background

On October 22 2021, EBCE filed its Energy Efficiency Program Administration Plan ("EE Plan") via AL 28-E. EBCE subsequently submitted supplemental AL 28-E-A on March 20 2022. AL 28-E, as amended in AL 28-E-A, provided the California Public Utilities Commission ("Commission") with details on EBCE's proposed program, as well as estimated maximum funding based on a formula set forth in D.14-01-033.

On September 15 2022, the Commission issued Resolution E-5215. Resolution E-5215 certified EBCE's EE Plan. Given the size of EBCE's budget compared to previous CCA EE plans, and the similarity of EBCE's program offering with efforts offered by PG&E as well as BayREN, the Commission required that EBCE enter into and submit to the Commission a JCM

[1] Resolution E-5125, *Certification of East Bay Community Energy's Energy Efficiency Program Administration Plan,* at page 30.

among itself, BayREN and PG&E.[2] Resolution E-5215 further directed that EBCE submit future Joint Cooperation Memos aligned with Annual Reports for program years 2023, 2024, and 2025.

Attachments

This AL contains the following attachments:

Attachment A: East Bay Community Energy, Pacific Gas and Electric Company, and Bay Area Regional Energy Network Joint Cooperation Memorandum for Program Year 2023 Energy Efficiency Programs

Tier Designation

This AL has a Tier 2 designation pursuant to OP 3 of Resolution E-5215, which requires EBCE to file a JCM as a Tier 2 AL with PG&E and BayREN within 90 days of September 15 2022.

Effective Date

Pursuant to General Order 96-B, EBCE requests that this Tier 2 AL become effective on January 12 2023, which is 30 calendar days after the date of this filing.

Conclusion

EBCE, PG&E, and BayREN respectfully submit the JCM pursuant to OP 3 of Resolution E-5215 and request approval of the JCM as described herein.

Notice

A copy of this AL is being served on the official Commission service list for Rulemaking 13-11-005.

Protests

Anyone wishing to protest this filing may do so by filing a protest with the Commission, EBCE, PG&E, and BayREN by January 2 2023, which is 20 calendar days after the date of this submittal. Protests should be mailed to the following address:

---

[2] Resolution E-5215: *Certification of East Bay Community Energy's Energy Efficiency Program Administration Plan*, at page 23.

CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Fax: (415) 703-2200
Email: EDTariffUnit@cpuc.ca.gov

Copies of protests should also be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest should also be sent via U.S. mail (and by facsimile and electronically, if possible) to EBCE, PG&E, and BayREN at the addresses shown below on the same date it is mailed or delivered to the Commission:

For EBCE:

Michael Quiroz
Regulatory Analyst
East Bay Community Energy
1999 Harrison St, Ste 800
Oakland, CA 94612
510-641-0950
mquiroz@ebce.org

For PG&E:

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
PGETariffs@pge.com

For BayREN:

Jennifer K. Berg
Director, Energy Section
Association of Bay Area Governments
375 Beale Street, 7th Floor
San Francisco, CA 94105
jberg@bayareametro.gov

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 Michael Quiroz at (510) 641-0950 or by electronic mail at mquiroz@ebce.org

/s/ Michael Quiroz

Michael Quiroz
Regulatory Analyst
East Bay Community Energy

Cc: Service List R.13-11-005
Service List A.17-01-013



California Public Utilities Commission

ADVICE LETTER SUMMARY

ENERGY UTILITY

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

Company name/CPUC Utility No.: East Bay Community Energy, ID 201

Utility type:
☑ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Michael Quiroz
Phone #: 510-641-0950
E-mail: mquiroz@ebce.org
E-mail Disposition Notice to: mquiroz@ebce.org

EXPLANATION OF UTILITY TYPE
ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 38-E

Tier Designation: 2

Subject of AL: East Bay Community Energy, Pacific Gas and Electric Company, and Bay Area Regional Energy Network Joint Cooperation Memorandum for Program Year 2023 Energy Efficiency Programs

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 #:
Resolution E-5215

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: 1/12/23 No. of tariff sheets: N/A

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 proposed[1]: N/A

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

[1]Discuss in AL if more space is needed.

Clear Form

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: Michael Quiroz
Title: Regulatory Analyst
Utility/Entity Name: East Bay Community Energy

Telephone (xxx) xxx-xxxx: 510-641-0950
Facsimile (xxx) xxx-xxxx:
Email: mquiroz@ebce.org

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

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	

Clear Form

Attachment A

East Bay Community Energy, Pacific Gas and Electric Company, and Bay Area Regional Energy Network Joint Cooperation Memorandum for Program Year 2023 Energy Efficiency Programs

Table of Contents

Overview **3**

Background and Purpose of JCM 3

Commercial Sector Overlapping Programs **3**

EBCE Commercial Pay-for-Performance (P4P) Energy Efficiency Program 3

BayREN Small Medium Commercial Buildings (SMCB) Program 3

PG&E Grocery Comprehensive Retrofit and Commissioning Program (PGE_Com_001) 4

PG&E SmartLabs (PGE_Com_002) 4

PG&E NetOne Comprehensive Commercial Program (PGE_Com_003) 4

PG&E High Tech & Bio Tech Efficiency Program (PGE_Com_004) 4

PG&E Healthcare Energy Fitness Initiative (PGE_Com_005) 5

PG&E Simplified Savings Program (PGE_Com_SmallBiz) 5

PG&E On-Bill Financing Offerings (PGE21091, PGE210911) 5

PG&E Commercial Calculated Incentives Program (PGE21011) 5

PG&E Commercial Deemed Incentives Program (PGE21012) 5

Coordination Efforts between EBCE, PG&E, and BayREN **7**

Program Referrals 7

Marketing 7

Double Dipping Prevention 7

Overview

Background and Purpose of JCM

This is a Joint Cooperation Memo (JCM) between East Bay Community Energy (EBCE), Pacific Gas and Electric (PG&E) and Bay Area Regional Energy Network (BayREN) as required by California Public Utilities Commission (CPUC) in Resolution E-5215. Given the similar energy efficiency program offerings across overlapping service areas, the purpose of this JCM is to provide the framework needed to avoid customer confusion and prevent double dipping of incentives.

The EBCE, PG&E, and BayREN teams have collaboratively discussed program coordination for 2023. This 2023 JCM includes the following information:

1. Summaries of comparable BayREN, PG&E, and EBCE commercial program offerings
2. Coordination framework between programs
3. Customer Referral Tree

Service Territories

EBCE's service territory is comprised of all of Alameda County as well as the City of Tracy (San Joaquin County; additionally, the City of Stockton will begin receiving service from EBCE in 2024).[1] The entirety of EBCE's service areas overlap with those of PG&E. Additionally, Alameda County is one of nine counties also served by BayREN. Unlike PG&E and BayREN, EBCE just offers one energy efficiency program within its service territory.

Commercial Sector Overlapping Programs

EBCE Commercial Pay-for-Performance (P4P) Energy Efficiency Program

EBCE's Commercial P4P Energy Efficiency program will launch in Quarter 1 of 2023. This program will leverage emerging P4P program approaches to offer cost-effective projects for its non-residential customer accounts. Projects will focus on high-potential opportunities for peak load management and building electrification, specifically in large commercial and industrial buildings. EBCE will pay incentives for cost-effective savings measured at the meter according to normalized-metered energy consumption (NMEC) methodologies approved by the CPUC. The primary objectives of this program are to 1) deliver cost-effective energy savings to commercial customers, 2) cross-promote demand response to maximize peak load reductions for energy efficiency projects, and 3) encourage electrification of existing natural gas end uses to achieve GHG reductions.

BayREN Small Medium Commercial Buildings (SMCB) Program

The BayREN Small and Medium Commercial Buildings (SMCB) program includes the BayREN Business FLEXmarket subprogram. BayREN Business FLEXmarket (formerly referred to as BayREN Commercial P4P) is an NMEC program. Beginning in 2022, BayREN Business FLEXmarket transitioned from using a single implementer to multiple implementers via Recurve's Demand FLEXmarket to deliver whole building energy efficiency solutions focusing on hard-to-reach (HTR) small-medium properties with less than 50,000 sq. ft or with energy use of less than 500,000 kWh or less than 25,000 therms annually. BayREN Business FLEXmarket leverages data-driven targeting to identify customers in this category and

[1] The City of Stockton voted to join EBCE in 2022. EBCE will begin service for the City of Stockton in 2024.

provides technical assistance and energy efficiency rebates to the following sectors: retail, professional offices, restaurants, gyms/multi-use buildings, and grocery/corner stores.

Within EBCE territory, BayREN Business FLEXmarket will only focus on HTR businesses. A commercial customer is considered HTR if the business is located in a Disadvantaged Community (DAC) and meets one of the criteria below. Or, if the business is outside of a DAC, the customer is considered HTR by meeting all the criteria below:

- Language – primary language spoken is other than English
- Size – less than 10 employees and/or classified as "Very Small" (customer whose annual electric demand is less than 20kW or whose annual gas consumption is less than 10,000 therms)
- Leased or rented facilities – Investments in improvements to a facility rented or leased by a participating business customer

The key differentiator of the BayREN SMCB program and the EBCE program is that within EBCE territory, the BayREN Business FLEXmarket will only focus on HTR businesses, whereas EBCE will be targeting non-HTR commercial customers. Another differentiator is that the BayREN program provides off-bill financing options, and advance incentives based on deemed/customer savings estimates in addition to meter-based savings.

PG&E Grocery Comprehensive Retrofit and Commissioning Program (PGE_Com_001)

The Grocery Comprehensive Retrofit and Commissioning Program, currently known by the implementer's customer facing name of CoolSave, targets medium to large size grocery and retail chains with grocery segments with a primary focus on improving refrigeration and refrigeration controls using a site specific NMEC approach. HVAC and lighting controls and capital projects are also considered on a limited basis.

PG&E SmartLabs (PGE_Com_002)

The SmartLabs program focuses on medium to large commercial and institutional laboratories with an emphasis on advanced control of ventilation and HVAC systems. This program focuses on an NMEC approach but will consider capital projects on a limited basis for lighting and refrigeration measures. This program is very focused on medium laboratory spaces and a specific technology strategy.

PG&E NetOne Comprehensive Commercial Program (PGE_Com_003)

The NetOne Commercial program is designed to serve customers of all sizes with all technologies in the commercial real estate market and retail. Utilizing all project submission channels, this program offers lighting, HVAC, and refrigeration measures. This program will offer comprehensive energy efficiency options for customers not served by other sector specific programs.

PG&E High Tech & Bio Tech Efficiency Program (PGE_Com_004)

PG&E's High Tech & Bio Tech Efficiency Program targets medium to large high tech and bio tech facilities but will consider smaller facilities in these customers' portfolios. This is a building controls centric program with HVAC systems as its primary technology focus. This program primarily uses the Custom Program Platform.

PG&E Healthcare Energy Fitness Initiative (PGE_Com_005)

The Healthcare Energy Fitness Initiative (targets medical facilities primarily for medium and large customers but considers smaller facilities in these customers' portfolios. This is a building controls centric program which seeks to optimize all building systems but also considers product-based capital projects in lighting, HVAC, and refrigeration. This program primarily uses the custom platform.

PG&E Simplified Savings Program (PGE_Com_SmallBiz)[2]

The Simplified Savings program is designed as a trade ally (TA) driven program for eligible non-residential Micro and Small Business (MSB) customers with demand <50kW. The program will use a combination of direct install measures along with rebated "add-on" measures for which an incentive will be provided to buy down the equipment costs. The program will provide targeted outreach to DAC and HTR areas as well as other prioritized areas, such as tribal communities and those affected by wildfires, as jointly agreed upon with PG&E.

PG&E On-Bill Financing Offerings (PGE21091, PGE210911)

PG&E offers energy efficiency financing through the On-Bill Financing, a program for a wide variety of energy efficient projects. The On-Bill Financing (OBF) loan program uses ratepayer funds to provide 0% interest financing to qualified non-residential customers towards the purchase and installation of new energy efficiency measures or equipment at the customer's premise. The loan terms are based on customer's projected monthly energy savings from the retrofit. When projects enrolled in an EBCE program utilize PG&E OBF, EBCE program managers will coordinate directly with PG&E OBF program managers to ensure customer and project eligibility requirements are met and provide required project details.

PG&E Commercial Calculated Incentives Program (PGE21011)

PG&E implements the Commercial Calculated Incentives program (for customers in its territory. The program provides financial incentives for non-residential customers to install new equipment or systems that exceed applicable code and/or industry standards in existing buildings. PG&E's Calculated program includes both customized incentives (formerly "Customized Retrofit") and Retro-commissioning (RCx) offerings. RCx represents an important element of PG&E's energy efficiency toolkit by reducing energy usage and optimizing the efficiency of mechanical equipment, lighting, and control systems to current standards in existing facilities. To these ends, PG&E offers financial and technical assistance for customers to undertake RCx projects and implement measures that improve facility operations.

PG&E Commercial Deemed Incentives Program (PGE21012)

The Commercial Deemed Incentives program offers a limited number of prescriptive rebates directly to customers, vendors, or distributors for the installation or sale of energy efficient equipment. These measures reach across technology segments including agriculture, HVAC, refrigeration, and water heating, where there is not an overlap with Statewide programs. While reduced, the prescriptive rebate approach continues to fill gaps in other programs and remains an attractive option for smaller projects.

[2] PG&E filed Advice 4664-G/6734-E on October 12, 2022, seeking CPUC approval of PG&E's contract with Resource Innovations, resulting from PG&E's Micro and Small Business Equity Program solicitation for energy efficiency customer programs. The Advice Letter is expected to be approved in early 2023.

Table 1. Comparable Programs in EBCE Territory

					Measures										
Program ID	**Program Name**	**Sector**	**2023 Budget**	**Segment**	Lighting	Appliances	HVAC	Plug Load	Refrigeration	Custom	Lighting	HVAC Controls	Whole Building	Water Heaters	Other
EBCE01	Commercial Pay for Performance Energy Efficiency Program	Commercial	TBD	Resource Acquisition	x	x	x	x	x	x	x	x	x	x	x
BayREN06	BayREN Business Program	Commercial	$3,464,297	Resource Acquisition	x	x	x	x	x	x	x	x	x	x	x
PGE21012	Commercial Calculated Incentives	Commercial	$4,171,984	Resource Acquisition	x	x	x		x	x	x	x	x		x
PGE21012	Commercial Deemed Incentives	Commercial	$2,600,283	Resource Acquisition	x	x	x	x	x			x		x	x
PGE_Com_001	CoolSave Grocery RCx Program	Commercial	$2,371,780	Resource Acquisition	x		x	x			x	x	x		x
PGE_Com_002	SmartLabs Program	Commercial	$1,671,560	Resource Acquisition	x		x	x			x	x	x		x
PGE_Com_003	NetOne Comprehensive Commercial Program	Commercial	$5,088,237	Resource Acquisition	x		x	x	x	x	x	x	x	x	x
PGE_Com_004	High Tech & Bio Tech Efficiency Program	Commercial	$3,731,386	Resource Acquisition	x		x	x	x	x	x	x	x	x	x
PGE_Com_005	Healthcare Energy Fitness Initiative	Commercial	$3,346,865	Resource Acquisition	x		x	x	x	x	x	x	x	x	x
PGE21091	On-Bill Financing (excludes Loan Pool)	Financing	N/A	Market Support	x	x	x		x	x	x	x		x	x
PGE210911	On-Bill Financing Alternative Pathway	Financing	N/A	Market Support	x	x	x	x	x	x	x	x		x	x
PGE_Com_Small Biz	Simplified Savings	Comm Micro Small Biz <50kw	$3,458,708	50/50 Market Support and Resource Acquisition	x		x	x	x	x	x	x		x	

Coordination Efforts between EBCE, PG&E, and BayREN

EBCE will coordinate with PG&E and BayREN on a recurring basis to review marketing plans and prevent or address double dipping of incentives. Additionally, EBCE will use these recurring meetings to review any changes to the programs included in this JCM, any new programs, or any changes to program contacts.

Program Referrals

EBCE will work with their selected implementer to assign a primary contact to be the lead source for EBCE's commercial program. This contact will not only be a resource for other Program Administrators with questions about EBCE's commercial program, but they will also be knowledgeable of all PG&E and BayREN comparable programs (Table 1) and be able to provide warm referrals to other appropriate program points of contact. To help PG&E and BayREN customer-facing points of contact, EBCE will provide talking points about the commercial energy efficiency program for others to use.

Marketing

EBCE acknowledges the need for marketing coordination across all Program Administrators to mitigate customer confusion. Prior to launch, EBCE will share a program marketing brief, which will capture the high-level messaging for the program. Additionally, EBCE will coordinate marketing plans for campaigns, customer-facing outreach materials, and timelines with PG&E and BayREN during recurring meetings.

Double Dipping Prevention

EBCE, PG&E, and BayREN are aware of the potential risk of customers being double paid for specific measures. To avoid double dipping, all parties propose the following:

- All program documentation (marketing collateral, participation forms, application forms, etc.) must indicate that program participants may not apply to multiple programs for the same measures.
- Project enrollment form will require an attestation that the customer has not applied for or received incentives from a different program for the same measures.
- The program implementer will ensure installing contractors are trained on double dipping policies:
    - BayREN will share enrolled and completed projects with EBCE on a quarterly basis.
    - PG&E will share with EBCE a quarterly data file of customers who have received rebates or incentives for the same program measures covered in the EBCE program. This data file will also include information about PG&E customers who have participated in a PG&E meter-based-program, including the implementation date and program closed date. The program closed date is the date the customer would be eligible to participate in an energy efficiency program again.
    - EBCE's program will cover measures also covered in the Statewide Upstream/Midstream programs, and EBCE will notify appropriate program managers of projects which install measures also covered by the statewide programs.
    - For EBCE measures which overlap with upstream or midstream incentive programs, EBCE's implementer will be directed to procure materials wholesale or direct from manufacturer to avoid double dipping.

    - Per BayREN's eligibility criteria, a customer cannot participate if they have participated in a ratepayer-funded energy efficiency program within the past 12 months.
- Discovery by any party of potential or actual overlap will require affected projects to be evaluated at the measure level. If a trend in double dipping is identified, PG&E BayREN and EBCE will work together towards program modifications. If both PG&E, BayREN, and / or EBCE have claimed the same project measures, PG&E, BayREN, and/ or EBCE will come to a determination about how the project will be claimed, and review cost-recovery options with the program partner or entity that has received funding twice. If a trend of double dipping is occurring with a specific contractor or installer, corrective actions may be taken.

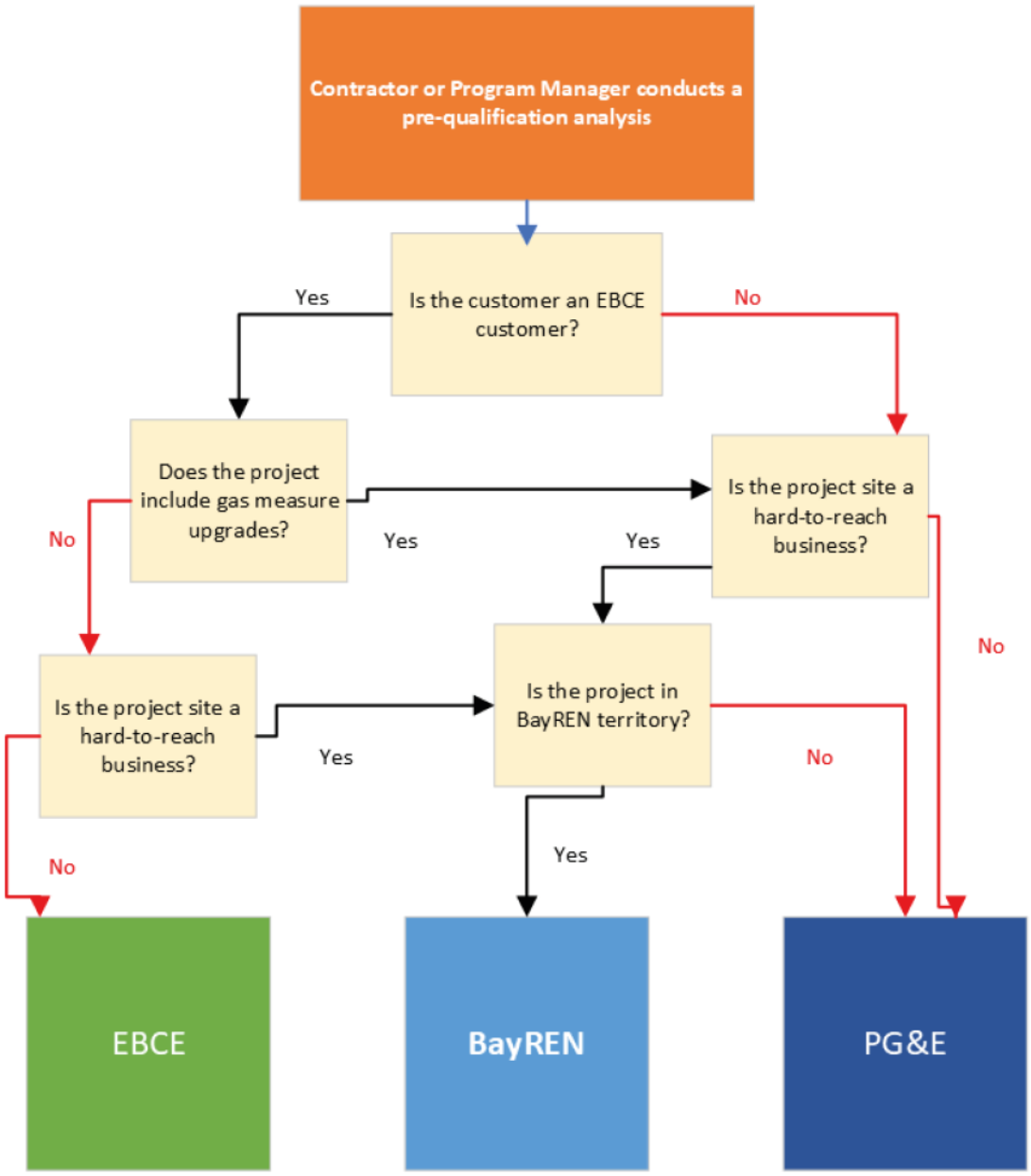

Figure 1. Customer Referral