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

Ava Community Energy Authority
ELC (Corp ID201)
Status of Advice Letter 43E
As of October 14, 2024

Subject: Ava's 2024 Joint Cooperation Memorandum with PG&E and BayREN

Division Assigned: Energy

Date Filed: 12-18-2023

Date to Calendar: 12-22-2023

Authorizing Documents: E-5215

Disposition:	**Accepted**
Effective Date:	**01-14-2024**

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Micheal Quiroz
510-641-0950
mquiroz@avaenergy.org

STATE OF CALIFORNIA **GAVIN NEWSOM,** *Governor*

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Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

Ava Community Energy
+1 833.699.3223
AvaEnergy.org
1999 Harrison Street, Suite 2300
Oakland, CA 94612

December 18, 2023

Advice Letter No. 43-E
(Ava 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: Ava Community Energy, Pacific Gas and Electric Company, and Bay Area Regional Energy Network Joint Cooperation Memorandum for Program Year 2024 Energy Efficiency Programs

Purpose

Pursuant to Ordering Paragraph ("OP") 3 of Resolution E-5215, issued on September 15 2022[1], Ava Community Energy ("Ava") 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") Ava 43-E, PG&E 7099-E, BayREN 24-E.

Background

On October 22 2021, Ava (formerly East Bay Community Energy[2]) filed its Energy Efficiency Program Administration Plan ("EE Plan") via AL 28-E. Ava 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 Ava'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 Ava's EE Plan. Given the size of Ava's budget compared to previous CCA EE plans,

[1] Resolution E-5125, *Certification of East Bay Community Energy's Energy Efficiency Program Administration Plan*, at page 30.
[2] Effective November 29, 2023, East Bay Community Energy amended its Joint Powers Authority to become known for all official purposes as Ava Community Energy Authority.

and the similarity of Ava's program offering with efforts offered by PG&E as well as BayREN, the Commission required that Ava enter into and submit to the Commission a JCM among itself, BayREN and PG&E.[3] Resolution E-5215 further directed that Ava 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: Ava Community Energy, Pacific Gas and Electric Company, and Bay Area Regional Energy Network Joint Cooperation Memorandum for Program Year 2024 Energy Efficiency Programs

Tier Designation

This AL has a Tier 2 designation pursuant to OP 3 of Resolution E-5215, which requires Ava to file a JCM as a Tier 2 AL with PG&E and BayREN for program years 2023, 2024, and 2025.

Effective Date

Pursuant to General Order 96-B, Ava requests that this Tier 2 AL become effective on January 14 2024, which is 30 calendar days after the date of this filing.

Conclusion

Ava, 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, Ava, PG&E, and BayREN by January 4 2024, which is 20 calendar days after the date of this submittal. Protests should be mailed to the following address:

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[3] 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 Ava, PG&E, and BayREN at the addresses shown below on the same date it is mailed or delivered to the Commission:

For Ava:

Michael Quiroz
Regulatory Analyst
Ava Community Energy
1999 Harrison St, Ste 2300
Oakland, CA 94612
510-641-0950
mquiroz@Ava.org

For PG&E:

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

For BayREN:

Jane Elias
Section Director, Energy Programs
Association of Bay Area Governments
375 Beale Street, Suite 700
San Francisco, CA 94105
415-778-4428
jelias@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@Avaenergy.org

/s/ Michael Quiroz

Michael Quiroz
Regulatory Analyst
Ava Community Energy
1999 Harrison St, Ste 2300
Oakland, CA 94612
510-641-0950
mquiroz@Ava.org

December 18, 2023

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.: Ava Community Energy, ID 201

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

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

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 43-E

Tier Designation: 2

Subject of AL: Ava Community Energy, Pacific Gas and Electric Company, and Bay Area Regional Energy Network Joint Cooperation Memorandum for Program Year 2024 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: 1/14/24

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 Ouiroz
Title: Regulatory Analyst
Utility/Entity Name: Ava Community Energy

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

Ava Community Energy, Pacific Gas and Electric Company, and Bay Area Regional Energy Network Joint Cooperation Memorandum for Program Year 2024 Energy Efficiency Programs

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BayREN Refrigerant Replacement (BRRR) Program 5

The BRRR Program is an equity program that focuses on replacing environmentally harmful refrigerants with less harmful refrigerants, including natural refrigerants. It also advances refrigeration energy efficiency retrofits using a direct-install approach where the participating business pays little to no out-of-pocket costs. Furthermore, BRRR provides participating businesses with resources to sustain refrigeration maintenance and tracking their systems' energy consumption. 5

Within the AVA territory, the BRRR Program only serves small food service businesses. Eligibility criteria, including energy thresholds, will be like those of the BayREN Business program. Examples of small food services include sit-down and take-out restaurants, small grocery and corner stores, bars, and community kitchens. 5

PG&E Grocery Comprehensive Retrofit and Commissioning Program (PGE_Com_001) 5

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Overview

Brand Transition

On October 24, 2023, East Bay Community Energy (EBCE) formally became Ava Community Energy (Ava). This name change reflects Ava's large and growing service area outside of the East Bay. Hereafter, EBCE will be referred to as Ava.

Background and Purpose of JCM

This is a Joint Cooperation Memo (JCM) between Ava Community Energy (Ava), Pacific Gas and Electric Company (PG&E) and Bay Area Regional Energy Network (BayREN) as required by California Public Utilities Commission (CPUC) in Resolution E-5215. The purpose of this JCM is to provide the framework needed to avoid customer confusion and prevent double dipping of incentives.

This 2024 JCM represents a shift in collaborative efforts compared to the JCM filed for 2023. The first JCM addressed coordination efforts related to commercial programs, particularly the pay-for-performance FLEXmarket[1] program designs. At the time, Ava had not yet selected a vendor or finalized program design.

In early 2023, Ava decided to implement a holistic energy management program, as opposed to a FLEXmarket approach. By nature of design, the revised program approach will substantially reduce customer overlap and therefore simplify coordination efforts and minimize potential of double dipping of incentives.

Given the programmatic shifts, Ava, PG&E, and BayREN teams have discussed program coordination for 2024. This updated JCM includes the summaries of comparable BayREN, PG&E, and Ava commercial program offerings, and coordination efforts between programs.

Service Territories

Ava's service territory is comprised of all of Alameda County as well as the City of Tracy (additionally, the City of Stockton will begin receiving service from Ava in 2024).[2] The entirety of Ava'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, Ava just offers one energy efficiency program within its service territory.

Commercial and Industrial Sector Overlapping Programs

Ava Building Efficiency Accelerator Program

The Building Efficiency Accelerator is a strategic energy management program for Ava's industrial, commercial, and municipal customers. The program is designed to target and engage a select group of Ava's non-residential, very large customers into cohort-based groups: one industrial cohort consisting of 10 customers, and two commercial cohorts each consisting of 12 customers. The Accelerator's core offerings for cohort participants are:

- Comprehensive building site assessments
- 1-2 years of technical assistance for potential capital projects

[1] https://www.demandflexmarket.com/#!directory

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

- Generous incentives for low- and no-cost behavioral, retro-commissioning, and operations (BRO) measures and energy efficiency and electrification projects
- Education through workshops and modules for building optimization and electrification

BayREN Small Medium Commercial Buildings (SMCB) Program

The BayREN Small and Medium Commercial Buildings (SMCB) program includes the BayREN Business subprogram. BayREN Business (formerly referred to as BayREN Commercial P4P) is a population-level, normalized metered energy consumption (NMEC) program. Beginning in 2022, BayREN Business transitioned from using a single implementer to multiple implementers to deliver whole building energy efficiency solutions. In June 2023, BayREN Business refined its service sector by only serving hard-to-reach (HTR), non-residential, small-medium properties with energy use of equal to or less than 150,000 kWh or equal to or less than 50,000 therms annually. BayREN Business leverages data-driven targeting to identify customers in this category and provides technical assistance and energy efficiency rebates to the following sectors: retail, professional offices, restaurants, gyms/multi-use buildings, and grocery/corner stores.

Within Ava territory, BayREN Business 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 25 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

BayREN Refrigerant Replacement (BRRR) Program

The BRRR Program is an equity program that focuses on replacing environmentally harmful refrigerants with less harmful refrigerants, including natural refrigerants. It also advances refrigeration energy efficiency retrofits using a direct-install approach where the participating business pays little to no out-of-pocket costs. Furthermore, BRRR provides participating businesses with resources to sustain refrigeration maintenance and tracking their systems' energy consumption.

Within the Ava territory, the BRRR Program only serves small food service businesses. Eligibility criteria, including energy thresholds, will be like those of the BayREN Business program. Examples of small food services include sit-down and take-out restaurants, small grocery and corner stores, bars, and community kitchens.

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

Implementer: KW Engineering

The Grocery Comprehensive Retrofit and Commissioning Program, currently known by the implementer's customer facing name of CoolSave, targets medium- to large-sized 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)

Implementer: KW Engineering

The SmartLabs program focuses on medium to large commercial and institutional laboratories with an emphasis on advanced control of ventilation and heating ventilation and cooling (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)

Implementer: Ecology Action

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)

Implementer: Resource Innovations

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)

Implementer: Resource Innovations

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 Summer Reliability Platform Administrator Placeholder (PGE_Com_007)

Implementer: TBD

Per PG&E October 2023 True-Up Advice Letter [3], PG&E is seeking a new EE and demand flexibility solution targeting the peak and net peak electric demand windows through an open market of qualified installers utilizing population NMEC method to measure savings. PG&E launched a solicitation for a Summer Reliability Platform Administrator (SRPA) in September 2023, with the intent to launch a program by the summer of 2024.

[3] PG&E filed Advice 4814-G/7047-E on October 16, 2023, PG&E's 2024–2027 True-Up Advice Letter in Compliance with Decision 21-05-031, Decision 23-06-055, and Decision 23-08-005

PG&E Simplified Savings Program (PGE_Com_SmallBiz)[4]

Implementer: Resource Innovations

The Simplified Savings program is designed as a trade ally (TA) and community based organization (CBO) driven program for eligible non-residential Micro and Small Business (MSB) customers. Primary eligibility includes demand of less than <50kW prioritizing DAC communities or customer groups who fit the definition of Hard To Reach. Other target areas will include tribal communities and those affected by wildfires. The program will engage all customers with education and site audits, resulting in a space level EE option report on the day of the visit. Customers will then have the option to take advantage of w direct install measures and rebated "add-on" measures for which an incentive will be provided to buy down the equipment costs. . While site level and program savings may occur, the primary goal of Simplified Savings is to educate and enable bill reduction through equipment adjustments, and behavioral changes for customers who have been traditionally underserved. The secondary goal is to motivate customer action to install EE upgrades including thermostats, timers, LED lighting, and refrigeration measures as well as a select group of active rebate measures such as Variable Frequency Drives, Heat Pump Water Heaters, and electronically commutated motosr (ECMs).

PG&E Strategic Energy Management (SEM) – Food Processing (PGE_IND_001a)

Implementer: CLEAResult

Strategic Energy Management is a holistic, whole-facility approach that focuses on business practice change from senior management through staff, affecting organizational culture to reduce energy waste and improve energy intensity. SEM emphasizes equipping and enabling plant management and staff to impact energy consumption through behavioral and operational change. While SEM does not emphasize a technical or project centric approach, SEM principles and objectives may support capital project implementation. "Strategic Energy Management" as used by the CPUC refers to specific, standalone programs designed by consultants to the investor owned utilities.[5]

The CLEAResult Strategic Energy Management (SEM) program is a third-party strategic energy management program specifically targeting food processors/producers and is a holistic, whole facility approach that uses NMEC and dynamic baseline model to determine energy savings from all program activity at the facility, including capital projects, custom and deemed calculated retrofits, maintenance and operation, and retro-commissioning projects. The program requires a multi-year customer commitment to participation in multiple cohort-type training workshops, individual or cohort energy analysis, and measurement and evaluation (M&V) activities based on information and characteristics of the facility's specific processes.

PG&E Strategic Energy Management (SEM) – Manufacturing (PGE_IND_001b)

Implementer: Leidos

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[4] 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.

[5] The "Strategic Energy Management – California Industrial SEM Design Guide" and the "Strategic Energy Management – EM&V Guide" are Available at https://pda.energydataweb.com/ and can be found by entering Strategic Energy Management in the search box. The Guides are considered living documents that may be updated during the course of the implementation of the current SEM programs and thereafter. These documents are considered part of the entire NMEC Guidance prepared and maintained by CPUC Staff.

Strategic Energy Management is a holistic, whole-facility approach that focuses on business practice change from senior management through staff, affecting organizational culture to reduce energy waste and improve energy intensity. SEM emphasizes equipping and enabling plant management and staff to impact energy consumption through behavioral and operational change. While SEM does not emphasize a technical or project centric approach, SEM principles and objectives may support capital project implementation. "Strategic Energy Management" as used by the CPUC refers to specific, standalone programs designed by consultants to the investor owned utilities.[6]

The Manufacturing Strategic Energy Management (SEM) program is a third-party strategic energy management program specifically targeting industrial manufacturers and is a holistic, whole facility approach that uses NMEC [7]and dynamic baseline model to determine energy savings from all program activity at the facility, including capital projects, custom and deemed calculated retrofits, maintenance and operation, and retro-commissioning projects. The program requires a multi-year customer commitment to participation in multiple cohort-type training workshops, individual or cohort energy analysis, and measurement and evaluation (M&V) activities based on information and characteristics of the facility's specific processes.

PG&E Business Energy Performance Program (PGE_IND_002)

Implementer: CLEAResult

The Business Energy Performance (BEP) Program targets the Petroleum, Chemical, and Minerals subsegments, driving adoption of energy efficient measures and practices through comprehensive account management, technical assistance, specialized engineering support, incentives and financing. BEP will increase participation, cost-effectiveness and savings delivery through targeted outreach, a focus on relationship building and long-term planning and industrial specific quality assurance and engineering assistance.

BEP will use traditional downstream deemed and custom platforms to achieve savings within common energy intensive end uses, including process equipment, pumping, refrigeration, steam systems, compressed air, and lighting.

PG&E Industrial Systems Optimization Program (PGE_Ind_003)

Implementer: Cascade Energy

The Industrial Systems Optimization Program (ISOP) targets the industrial manufacturing and food processing market segments throughout PG&E's territory, focusing on training, retro-commissioning, and capital projects with systems-level optimization. ISOP offers participants two tiers of engagement: 1) an enhanced track that includes energy management coaching, energy management and collaboration software, and ongoing energy coach support to drive projects; and 2) a standard track that includes regular energy coach touchpoints and technical support to identify and implement projects.

ISOP will use traditional deemed, custom, and NMEC* platforms to achieve savings, and supports all relevant measure types, with a focus on complex mechanical systems such as refrigeration, compressed air, pumping, fans, blowers, boiler and steam systems, and the industrial processes they serve.

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[6] Same as footnote 4

[7] https://www.cpuc.ca.gov/-/media/cpuc-website/files/legacyfiles/n/6442463694-nmec-rulebook2-0.pdf

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

PG&E offers energy efficiency financing through 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 a customer's projected monthly energy savings from the retrofit. When projects enrolled in an Ava program utilize PG&E OBF, Ava 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. Currently in the ramp-down process, this program is focused on meeting existing customer commitments, and closed to new applications. The program has provided financial incentives for non-residential customers to retrofit equipment or systems that exceed applicable code and/or industry standards in existing buildings..
Its mission has been to offer financial and technical assistance for customers to undertake retro-commissioning (RCx) projects and implement measures that improve facility operations. These elements of service have been built into third-party programs which address most customer circumstances.

PG&E Industrial Calculated Incentives Program (PGE21021)

PG&E implements the Industrial Calculated Incentives program. Currently in the ramp-down process, this program is focused on meeting existing customer commitments, and closed to new applications. The program has provided financial incentives for non-residential customers to retrofit equipment or systems that exceed applicable code and/or industry standards in existing buildings. Its mission has been to offer financial and technical assistance for customers to undertake RCx projects and implement measures that improve facility operations. These elements of service have been built into third-party programs which address most customer circumstances.

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.

Table 1. Comparable Programs in Ava Territory

					Measures										
Program ID	**Program Name**	**Sector**	**2024 Budget**	**Segment**	Lighting	Appliances	HVAC	Plug Load	Refrigeration	Custom	Lighting	HVAC Controls	Whole Building	Water Heating	Other
EBCE01	Building Efficiency Accelerator	Commercial	$4,487,683	Resource Acquisition	x	x	x	x	x	x	x	x	x	x	x
BayREN06	BayREN Business Program	Commercial	$4,576,889	Resource Acquisition	x	x	x	x	x	x	x	x	x	x	x
BayREN10	BayREN Refrigerant Replacement Program	Commercial	$3,468,064	Equity	x	x			x	x	x				x
PGE21012	Commercial Calculated Incentives	Commercial	$654,990	Resource Acquisition	x	x	x		x	x	x	x	x		x
PGE21021	Industrial Calculated Incentives	Industrial	$4,013,015												
PGE21012	Commercial Deemed Incentives	Commercial	$1,319,113	Resource Acquisition	x	x	x	x	x			x		x	x
PGE_Com_001	CoolSave Grocery RCx Program	Commercial	$1,161,667	Resource Acquisition	x		x	x			x	x	x		x
PGE_Com_002	SmartLabs Program	Commercial	$86,839	Resource Acquisition	x		x	x			x	x	x		x
PGE_Com_003	NetOne Comprehensive Commercial Program	Commercial	$4,940,733	Resource Acquisition	x		x	x	x	x	x	x	x	x	x
PGE_Com_004	High Tech & Bio Tech Efficiency Program	Commercial	$1,558,225	Resource Acquisition	x		x	x	x	x	x	x	x	x	x
PGE_Com_005	Healthcare Energy Fitness Initiative	Commercial	$1,491,203	Resource Acquisition	x		x	x	x	x	x	x	x	x	x
PGE_Com_007	Summer Reliability Platform Administrator Placeholder	Commercial	$6,234,655	Resource Acquisition	x		x		x	x	x	x	x	x	x

PGE_Ind_001a	Strategic Energy Management – Food Processing	Industrial	$6,522,373	Resource Acquisition	x				x	x	x	x			x
PGE_Ind_001a	Strategic Energy Management – Manufacturing	Industrial	$7,633,667	Resource Acquisition	x				x	x	x	x			x
PGE_Ind_002	Business Energy Performance	Industrial	$2,460,418	Resource Acquisition	x					x	x	x			x
PGE_Ind_03	Industrial Systems Optimization Program	Industrial	$4,054,384	Resource Acquisition	x		x		x	x	x	x			x
PGE_OBFAP	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	$10,000,000 loan pool addition	Market Support	x	x	x	x	x	x	x	x		x	x
PGE_Com_Small Biz	Simplified Savings	Comm Micro Small Biz <50kw	$2,864,608	Market Support and Resource Acquisition Program IDs	x		x	x	x	x	x	x		x	

Coordination Efforts

Ava, PG&E and BayREN serve as customer-facing PAs for their respective energy efficiency programs. Ava, PG&E and BayREN coordinate to update each other on program developments, and discuss duplication and double dipping prevention among their EE program offerings.

In the 2023 JCM, the coordination efforts between Ava, PG&E, and BayREN centered on check-in meetings, program referrals, and coordinated marketing campaigns. Given the changes in program design, coordination efforts will be more streamlined.

Customer Choice

Customers have a choice between Ava, PG&E, and BayREN programs. To ensure that customers understand this, the PAs will take steps to ensure the information on all programs is known by those staffers engaging with customers. Specifically, PG&E will designate a Program Manager within PG&E that Ava and BayREN can call for any questions regarding program options. Similarly, Ava and BayREN program staff are available for questions from PG&E staff. Furthermore, PG&E, Ava, and BayREN have access to program documentation available on California Energy Data and Reporting System ("CEDARS") and may use it as reference when communicating program options to customers. PG&E, Ava, and BayREN will keep program documents up-to-date in CEDARS and communicate program updates in their planned meetings as needed.

Program Referrals

Considering the changes in program design, Ava will only be targeting very large customers for the Accelerator program. Additionally, active recruitment for the Accelerator program will conclude by the end of Q2 2024. Given the defined end point for recruitment and the highly targeted outreach strategy, the need for a program referral tree, which was previously established for ongoing customer enrollment, is less essential for coordination with Ava's program.

However, Ava, BayREN, and PG&E will continue to support each other's efforts to maximize customer benefits. When a customer does not meet the Accelerator's targeting criteria, Ava will refer potential prospects to BayREN's Business program or PG&E's commercial or industrial programs and coordinate with the appropriate project lead.

Ava and PG&E Coordination

Ava's Building Efficiency Accelerator program offering will overlap with the same commercial and industrial customer segments as all PG&E's programs aside from the Simplified Savings Program, which targets small business <50,000 kWh. Because Ava's program is only targeting 34 customers (24 commercial and 10 industrial), Ava and PG&E will rely heavily on sharing customer data to avoid dual enrollment and double dipping.

Due to the sensitive nature of sharing customer data, Ava, PG&E, and Ava's program implementer executed a mutual data sharing Non-Disclosure Agreement (NDA). The NDA allows for the secure sharing of program data related to all customers participating in commercial programs, both NMEC and non-NMEC, within Ava's service territory.

In 2024, PG&E will share with Ava a quarterly data file of customers who have received rebates or incentives for the same program measures covered in the Ava 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.

This data will enable Ava to check for overlaps and ensure customers are not receiving double incentives or services. Since Ava is only recruiting 34 customers into the Building Efficiency Accelerator over the three-year program lifespan, Ava will securely share the service agreement IDs (SA_IDs) of customers as they are enrolled in the Accelerator program. This will allow PG&E to exclude these customers from their outreach efforts.

Additionally, Ava will coordinate with PG&E on program savings and financial forecasts on a quarterly basis, as described below.

- Quarterly Savings Forecasts: Ava shall submit to the PG&E program manager four quarterly savings forecast updates every year, of estimated energy savings from the Ava EE program. These quarterly updates shall include kW, kWh, and Therms.
- Quarterly Financial Forecasts: Ava shall submit to the PG&E program manager on an annual basis, four quarterly financial forecast updates. These quarterly updates may include, but are not limited to, changes to the Ava payments schedule, if any.

Ava and BayREN Coordination

There is little to no overlap between Ava's Building Efficiency Accelerator and the BayREN Business program as BayREN's program is a population-level, pay-for-performance incentive program. It only targets hard-to-reach commercial entities with annual usage <150,000-kWh and <50,000 therms. On the other hand, the Ava's program targets very large commercial, industrial, and municipal sites with annual usage over 2,000,000-kWh and includes incentives for electrification. It would be usual for any participant in Ava's program to be eligible for the BayREN program.

Additionally, there's also little to no overlap between Ava's Building Efficiency Accelerator and the BayREN Refrigerant Replacement program. This is because BayREN's program is targeting a narrow band of food-service businesses with limited annual energy usage and other small-business characteristics.

While it would be unusual for a customer to appear in both programs, Ava and BayREN have agreed to share general project data to verify against dual enrollment or double dipping. If BayREN receives an application for a customer site within Ava territory, BayREN will securely email the business name and address to Ava. Ava will review the customer to ensure they are not enrolled in the Accelerator program. If they are enrolled in the Accelerator program, Ava and BayREN will schedule a meeting to discuss project details (e.g. enrollment date, scope, etc.) and determine appropriate next steps.

Additional Double Dipping Prevention

To further 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.
- As Ava's program will cover measures also covered in the Statewide Upstream/Midstream programs, and Ava will notify appropriate program managers of projects that install measures also covered by the statewide programs.
- For Ava measures that overlap with upstream or midstream incentive programs, Ava's implementer will be directed to procure materials wholesale or direct from manufacturer to avoid double dipping.
- Ava's Building Efficiency Accelerator Program will perform a double dip check on all three cohort applicants to ensure no overlapping participation in an equivalent program.

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 Ava will work together towards program modifications. If PG&E, BayREN, and / or Ava have claimed the same project measures, PG&E, BayREN, and/ or Ava 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.

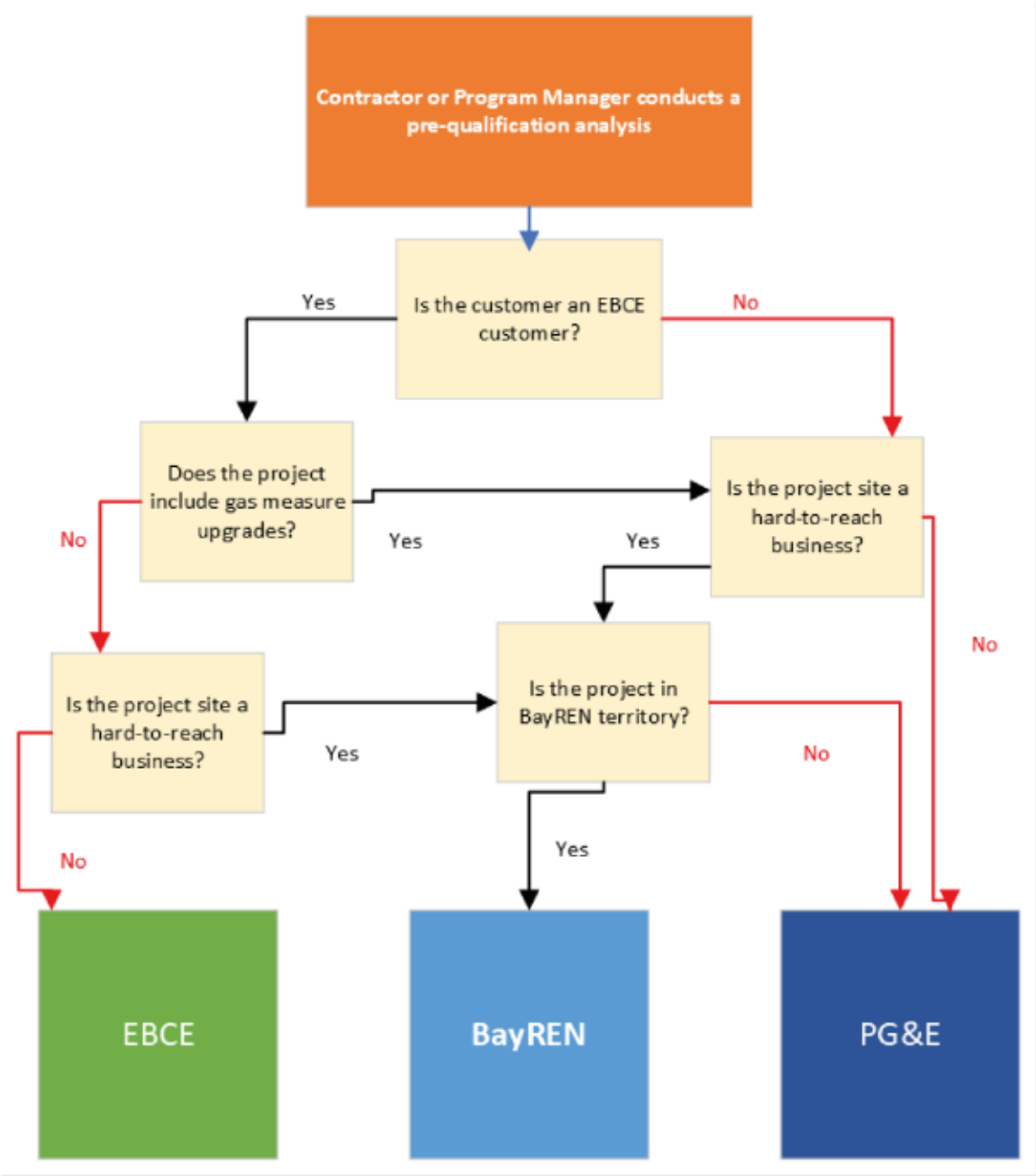

Figure 1. Customer Referral