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

Ava Community Energy Authority
ELC (Corp ID 201)
Status of Advice Letter 49E
As of August 15, 2024

Subject: Present the budget and marketing, education, and outreach plan for AVA Community Energy's 2025 Disadvantaged Communities Green Tariff Program Rate.

Division Assigned: Energy

Date Filed: 07-08-2024

Date to Calendar: 07-26-2024

Authorizing Documents: D1806027

Authorizing Documents: E-4999

Authorizing Documents: E-5125

Disposition:	**Accepted**
Effective Date:	**08-07-2024**

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:
edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:
Todd Edmister
510-650-7579
tedmister@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Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



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/# 201

Utility type:
- [x] ELC
- [ ] GAS
- [ ] WATER
- [ ] PLC
- [ ] HEAT

Contact Person: Todd Edmister
Phone #: 510-650-7579
E-mail: tedmister@avaenergy.org
E-mail Disposition Notice to: tedmister@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) #: 49-E (PUBLIC VERSION) Tier Designation: 2

Subject of AL: Present the budget and marketing, education, and outreach plan for AVA Community Energy's 2025 Disadvantaged Communities Green Tariff Program Rate.

Keywords (choose from CPUC listing): Compliance, Tariffs

AL Type: [ ] Monthly [ ] Quarterly [ ] Annual [ ] One-Time [ ] Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:
D. 18-06-027, Resolution E-4999, Resolution E-5125

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: Appendix C: EBCE DAC-GT/CSGT Work Papers
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: Todd Edmister, tedmister@avaenergy.org

Resolution required? [ ] Yes [ ] No

Requested effective date: 8/7/24 No. of tariff sheets: N/A

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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:

Service affected and changes proposed[1]:

Pending advice letters that revise the same tariff sheets:

[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: Todd Edmister
Title: Senior Director of Public Policy and Deputy General Counsel
Utility/Entity Name: AVA Community Energy

Telephone (xxx) xxx-xxxx: 510-650-7579
Facsimile (xxx) xxx-xxxx:
Email: tedmister@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

Todd Edmister
Senior Director of Public Policy and
Deputy General Counsel

Ava Community Energy
1999 Harrison St, Suite 2300
Oakland, CA 94610

July 8, 2024

Advice No. 49-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: Present the Budget and Marketing, Education, and Outreach Plan for Ava Community Energy's 2025 Disadvantaged Communities Green Tariff Program Rate

Pursuant to Ordering Paragraph ("OP") No. 17 of California Public Utilities Commission ("Commission" or "CPUC") Decision ("D.") 18-06-027, *Alternate Decision Adopting Alternatives to Promote Solar Distributed Generation in Disadvantaged Communities*, issued in R.14-07-002 on June 22, 2018, Resolution E-4999, issued on June 3, 2019, and Resolution E-5125, issued on August 5, 2021, Ava Community Energy ("Ava") hereby submits this Advice Letter ("AL") to seek approval of the 2025 budget forecast and Marketing Education and Outreach ("ME&O") plan for Ava's Disadvantaged Community Green Tariff ("DAC-GT") program.

Effective Date

Ava requests that this Tier 2 Advice Letter become effective within 30 days of submission pursuant to G.O. 96-B, General Rule 7.5.2.

Tier Designation

This AL is submitted as a Tier 2 Designation pursuant to Resolution E-5125, which ordered administrators of the DAC-GT program to submit Annual Budget Advice Letters as a Tier 2 designation.

Purpose

Through this AL, Ava seeks CPUC approval of its budget request for program year ("PY") 2025 for the DAC-GT program. Per Resolution E-4999, the budget request includes both the budget

reconciliation for the previous PY (i.e. 2023) and the budget forecast for the upcoming PY (i.e. 2025). In addition to the budget request, Ava submits its ME&O plan for PY 2025 as Appendix B.

Background

A. Ava Background

Ava, formerly known as East Bay Community Energy[1] is a Joint Powers Authority formed on December 1, 2016 pursuant to California Government Code §§ 6500 *et. seq.* by the County of Alameda and each of the following cities incorporated therein: Albany, Berkeley, Dublin, Emeryville, Fremont, Hayward, Livermore, Oakland, Piedmont, San Leandro, and Union City. The Commission certified Ava's Implementation Plan on November 8, 2017. Ava started serving Alameda County businesses and municipalities in June 2018 and began serving residential customers in November 2018. On March 9, 2020, the Commission certified Addendum #1 to Ava's Implementation Plan and Statement of Intent, adding the cities of Newark and Pleasanton, as well as the city of Tracy in San Joaquin County, to Ava's service territory beginning in 2021. On March 8, 2023, the Commission certified Addendum #4 to Ava's Implementation Plan and Statement of Intent, pursuant to which Ava will begin serving the City of Stockton and City of Lathrop in 2025.[2] Ava is currently one of the largest Community Choice Aggregators ("CCAs") in the state.

B. Green Access Program Background

On June 22, 2018, the Commission issued D.18-06-027, adopting three new "Green Access Program" tariffs to promote the installation of renewable generation among residential customers in disadvantaged communities ("DAC"), as directed by the California Legislature in Assembly Bill (AB) 327 (Perea, Stats. 2013, ch 611). Two of those programs, the DAC-GT and the Community Solar Green Tariff ("CSGT") programs, are community solar programs which offer 100% solar energy to customers and provide a 20% discount on the electric portion of the bill.

CCA programs and tariffs must abide by all program rules and requirements adopted in D.18-06-027 and must file a Tier 3 AL to implement the CCA DAC-GT and CSGT programs.[3] Resolution E-4999 provides that CCA implementation ALs must be filed on or before January 1, 2021. [4]

C. Advice Letter Deadline

Resolution E-4999 provides that DAC-GT and CSGT Program Administrators must submit an annual program budget estimate and an annual ME&O plan via a Tier 1 Advice Letter by

[1] Ava submitted a Notice of Party Name Change on February 7, 2024 under Rulemaking 14-07-002 ("R. 14-07-002")
[2] Resolution E-4907.
[3] D.18-06-027 at p.104 (OP 17).
[4] Resolution E-4999 at p.16.

February 1st of every year, starting in 2020, for the next program year.[5] Resolution E-5125 ordered that these Annual Budget Advice Letters be elevated from Tier 1 to a Tier 2 designation.[6] On June 7, 2024, the CPUC issued D. 24-05-065 directing program administrators to submit their annual budget advice letter on April 1st moving forward.[7]

On December 4, 2023 and January 11, 2024, the Joint Community Choice Aggregators ("Joint CCAs")[8] submitted requests for extension of time to submit their Tier 2 Budget Advice Letters for the 2025 program year of the DAC-GT and CSGT programs so that program administrators have enough time to report on accurate true-up and forecasting values. CPUC Executive Director Rachel Peterson responded on January 24, 2023, granting the Joint CCA's extension "to submit their annual budget ALs until May 1, 2024 or 30 days after the issuance of a Final Decision in proceeding A.22-05-022, whichever is later." The Commission issued D.24-05-065 in Application 22-05-022 on June 7, 2024; hence this budget advice letter is due July 8, 2024.

D. Discontinuation of CSGT Program

Assembly Bill ("AB") 2316 (Stats. 2022, Ch. 350) required the Commission to evaluate existing Green Access Program tariffs. The evaluation was based on three criteria: whether the programs (1) efficiently serve distinct customer groups; (2) minimize duplicative offerings; and (3) promote robust participation by low-income customers to determine the programs' efficacy.[9] On May 30, 2024, the Commission voted to approve D.24-06-065, *Decision Modifying Green Access Program Tariffs and Adopting a Community Renewable Energy Program*.[10] According to D. 24-05-065, the CSGT program posed distinct challenges warranting the program's termination. The decision consolidates the CSGT program into a modified DAC-GT program. Therefore, Ava removes the CSGT Program from its 2025 budget in this AL.[11]

Discussion

Ava's DAC-GT amended budget forecast and ME&O plan for Program Year 2025 are attached to this Advice Letter in the following appendices:

1. Appendix A: Budget Forecast for the Disadvantaged Communities Green Tariff Program for Program Year 2025;

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[5] *Id.* at OP 2.
[6] Resolution E-5125 at 2.
[7] Decision 24-05-065 OP 3, p. 170.
[8] The Joint CCAs include Ava; Clean Power Alliance of Southern California; the City and County of San Francisco, acting by and through its Public Utilities Commission; Marin Clean Energy; Peninsula Clean Energy Authority; San Diego Community Power; and San José Clean Energy.
[9] Decision 24-05-065 p. 6
[10] Decision issued on June 7, 2024.
[11] Note that the 2023 budget includes CSGT numbers for cost recovery purposes.

2. Appendix B: Marketing, Education and Outreach Plan for the Disadvantaged Green Tariff Program for Program Year 2025;

3. Confidential Appendix C: Workpapers; and

4. Appendix D: Declaration of Eleanor Smith in Support of Confidential Treatment.

Request for Confidential Treatment

In support of this Advice Letter, Ava provides certain confidential information that is contained in Confidential Appendix C. Ava hereby requests confidential treatment of this Confidential Information. The Confidential Information contains protected market sensitive/competitive data and corporate financial records protected under Civ. Code §§3426 et seq. (trade secrets); Govt. Code §§ 7927.300 (information relating to utility systems development or market reports obtained in confidence), 7927.705 (disclosures prohibited by state or federal law), 7927.605(a) (financial records); 7930.205 (trade secrets); and Evid. Code §1060 (trade secrets). The request for confidential treatment is further supported by the attached declaration of Eleanor Smith in Appendix D. The confidential information can be made available to non-market participants as required by D.20-07-005 after they have executed a nondisclosure agreement with Ava. To execute a nondisclosure agreement, please contact Todd Edmister at tedmister@avaenergy.org.

Conclusion

Ava respectfully requests that the Commission approve Ava's 2025 budget forecast and ME&O plan for the DAC-GT program as described in the attached appendices.

Notice

A copy of this AL is being served on the official Commission Service List for Rulemaking 14-07-002 and Application 16-07-015.

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.

Protest

*****Ava is currently unable to receive protests or responses to this advice letter via U.S. Mail or fax. Please submit protests or responses to this advice letter to EDTariffUnit@cpuc.ca.gov and tedmister@avaenergy.org*****

Anyone wishing to protest this advice letter filing may do so by sending a 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 should be mailed to:

CPUC
Attention: Energy Division Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102
Facsimile: (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 (same address above).

The protest should also be sent electronically to Ava at the email address shown below on the same date it is mailed or delivered to the Commission:

Todd Edmister
Senior Director of Public Policy and Deputy General Counsel
Ava Community Energy
1999 Harrison Street, Suite 2300
Oakland, CA 94610
(510) 650-7579
Email: tedmister@avaenergy.org

/s/ Todd Edmister
Todd Edmister
Senior Director of Public Policy and Deputy General Counsel
Ava Community Energy
1999 Harrison Street, Suite 2300
Oakland, CA 94610
(510) 650-7579
Email: tedmister@avaenergy.org

cc: Service List: R.14-07-002
Service List: A.16-07-15
Joshua Litwin (Energy Division)

APPENDIX A

Budget Forecast for the Disadvantaged Communities Green Tariff for Program Year 2025

Proposed by Ava Community Energy



1. PURPOSE

Pursuant to Ordering Paragraph ("OP") 17 of Decision ("D.")18-06-027 *Alternate Decision Adopting Alternatives to Promote Solar Distributed Generation in Disadvantaged Communities* and guidance provided in Resolutions E-4999 and E-5124, Ava hereby submits its 2025 budget request for the Disadvantaged Communities Green Tariff ("DAC-GT") program. The 2025 budget request covers the budget reconciliation for the previous program year ("PY"), 2023, and the forecasted budget for the upcoming PY, 2025.

On June 7, 2024, the Commission issued D.24-05-065 *Decision Modifying Green Access Program Tariffs and Adopting a Community Renewable Energy Program* which discontinues the Community Solar Green Tariff ("CSGT") program and consolidates allocated capacity into a modified DAC-GT program. In accordance with this decision, Ava's budget request does not include forecasted 2025 CSGT costs but does include a reconciliation of prior 2023 CSGT costs.

Ava requests that the budget proposed herein be approved by the Commission and that the Commission direct PG&E to transfer funds sufficient to meet Ava's budget request per the funding mechanisms determined in Ordering Paragraph 3 of Resolution E-5124.

2. BACKGROUND

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];
3. Program administration costs:
    a. Program management;
    b. Information technology ("IT");
    c. Billing operations;
    d. Regulatory compliance; and

[1] A detailed description of each budget line item can be found in Ava's Implementation Plan, submitted in Appendix A to Ava Advice Letter 14-E filed on September 11, 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/ CSGT 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/ CSGT resources and the otherwise applicable class average generation rate."

[3] Resolution E-5124 determined that CCAs must calculate the 20% discount on the full electric portion of the bill (i.e., both generation and delivery portions of the electric bill) and that the full bill discount will be shown on the generation portion of the customer bills. Hence, beginning with Ava's revised 2021 budget forecast, submitted as Advice Letter 24-E, Ava's budget forecast reflects the cost to provide the 20% bill discount to customers, based on the full electric bill.

e. Procurement.

4. Marketing, education and outreach ("ME&O") costs:
    a. Labor costs;
    b. Outreach and material costs, including local community-based organization ("CBO")/sponsor costs.

Ava excluded the integration costs in our program budget for 2025. Instead, PG&E included the CCA integration costs in its 2024 budget advice letter forecast for program year 2025. PG&E explained that it budgeted and requested these funds for CCA integration in PG&E's AL 6872-E. The integration costs process changed so it is better streamlined amongst 5 CCAs and PG&E. The Commission accepted these changes as outlined in AL 6872-E on April 1, 2023.

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

1. Existing capacity at previous PY's close;
2. Forecasted capacity for procurement in the upcoming PY;
3. Customers served at previous PY's close; and
4. Forecasted customer enrollment for the upcoming PY.

Finally, Ava will submit confidential workpapers to the California Public Utilities Commission ("CPUC" or "Commission") showing:

1. Calculation of the generation cost delta;
2. Calculation of the 20% bill discount to participating customers;
3. Calculation of administrative and ME&O costs.

For the reasons set forth in the attached declaration of Eleanor Smith, these workpapers are confidential, not included in the public version of this Advice Letter and will only be made available to those who execute a nondisclosure agreement. Further information on how to execute a nondisclosure agreement can be found in the cover letter for this Advice Letter.

3. BUDGET FORECAST FOR PY 2025

For PY 2025, Ava forecasts program spending to total $1,519,833 for the DAC-GT program. A detailed budget forecast by budget line item can be found in the table below.

Table 1. Budget Forecast for Program Year 2025

Row #	Category	DAC-GT
1	**Generation Cost Delta**	$ 698,485
2	**20% Bill Discount**	$ 733,031
3	Program Administration	
4	Program Management	$ 25,927
5	Information Technology	$ -
6	Billing Operations	$ 32,105
7	Regulatory Compliance	$ 7,841
8	Procurement	$ 13,457
9	**Subtotal Program Administration**	$ 79,331
10	Marketing, Education & Outreach	
11	Labor Costs	$ 3,986
12	Outreach and Materials	$ 5,000
13	**Subtotal ME&O**	$ 8,986
14	**Total**	$ 1,519,833

Ava provides the following clarifying notes regarding the budget summary.

Generation Cost Delta

Ava's DAC-GT projects are expected to come online in 2026. Therefore, Ava will continue to rely on interim resources for the DAC-GT program during 2025. Costs associated with the generation cost delta in its PY 2025 forecast are based on the anticipated costs of interim resources in 2025.

20% Bill Discount

Resolution E-5124 determined that CCAs must calculate the 20% discount on the full electric portion of the bill (i.e., both generation and delivery portions of the electric bill) and that the full bill discount will be shown on the generation portion of the customer bills.[4] Hence, Ava's budget forecast reflects the cost to provide the 20% bill discount to customers, based on the full electric bill, for PY 2025.

Program Administration

Program management includes program development and 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 covers costs for ongoing billing operations and customer support once all systems are developed, as well as coordination with PG&E on semi-manual billing processes. Regulatory covers costs for regulatory compliance and related program filings with the Commission, as well as related legal fees and fees associated

[4] Resolution E-5124, at 24.

with Green-e® certification of both programs. Procurement covers costs to develop and manage the solicitations for solar resources under the program and annual renewable energy credit (REC) retirement and compliance functions.

Marketing, Education and Outreach

ME&O budgets are split into two categories – (1) Ava labor costs and (2) Ava direct costs for outreach and materials. ME&O costs for the DAC-GT program reflect anticipated marketing and outreach efforts to customers newly enrolled from the DAC-GT program waitlist, as program space becomes available.

Adding New Customers

Ava will serve Stockton and Lathrop residents, businesses, and municipal accounts starting in 2025. These customers are not accounted for in this budget, yet Ava is currently engaging with PG&E to identify how to move DAC-GT participants over to Ava's program. Conversations are ongoing and more information will be available in the 2025 annual budget advice letter.

4. BUDGET RECONCILIATION FOR PY 2023

The table below compares Ava's PY 2023 budget forecast[5] to actual program expenses incurred in 2023. The "true up" column shown in the table subtracts actual costs from forecasted values for each budget category; a negative value, denoted in parentheticals, indicates unspent funds. Overall, in 2023, Ava spent less than the requested amounts in its PY 2023 budget forecast.

Table 2. Budget Reconciliation for Program Year 2023

Row #	Category	DAC-GT			CSGT		
		Forecast	Actual	True-up	Forecast	Actual	True-up
1	**Generation Cost Delta**	$ 654,819	$ 402,329	$ (252,490)	$ 26,541	$ -	$ (26,541)
2	**20% Bill Discount**	$ 265,158	$ 500,038	$ 234,880	$ 8,144	$ -	$ (8,144)
3	Program Administration						
4	Program Management	$ 41,181	$ 20,612	$ (20,569)	$ 59,945	$ 9,983	$ (49,962)
5	Information Technology	$ -	$ -	$ -	$ -	$ -	$ -
6	Billing Operations	$ 28,918	$ 31,200	$ 2,283	$ 2,418	$ -	$ (2,418)
7	Regulatory Compliance	$ 16,239	$ 15,497	$ (741)	$ 16,239	$ 3,710	$ (12,529)
8	Procurement	$ 17,065	$ 55,548	$ 38,483	$ 17,065	$ 7,812	$ (9,253)
9	CCA Integration Costs	$ 1,215	$ 1,624	$ 409	$ 1,215	$ -	$ (1,215)
10	**Subtotal Program Administration**	$ 104,616	$ 124,481	$ 19,865	$ 96,881	$ 21,504	$ (75,377)
11	Marketing, Education & Outreach						
12	Labor Costs	$ 19,006	$ 3,421	$ (15,585)	$ 32,183	$ 194	$ (31,989)
13	Outreach and Materials	$ 2,500	$ 4,256	$ 1,756	$ 42,500	$ -	$ (42,500)
14	**Subtotal ME&O**	$ 21,506	$ 7,677	$ (13,829)	$ 74,683	$ 194	$ (74,489)
15	**Total**	**$ 1,046,099**	**$ 1,034,526**	**$ (11,573)**	**$ 206,249**	**$ 21,698**	**$ (184,550)**

The primary driver of Ava's 2023 unspent funds is due to the timing of Ava's CSGT program

[5] Ava's PY 2023 budget request was submitted on February 1, 2022 as Ava AL 35-E. AL 35-E was accepted by the CPUC's Energy Division and has an effective date of March 3, 2022.

launch. Ava initially anticipated launching its CSGT program by 2023.

5. 2025 BUDGET REQUEST

Ava includes in the table below the unspent balances from Program Year 2023 and applies the unspent balance to the budget request for 2025. Based on the budget forecast for PY 2025 presented in section 3 and the budget reconciliation for PY 2023 presented in section 4, Ava is requesting a total budget of $1,323,710 for the DAC-GT program in this budget AL.

Table 3. Final Requested Budget for PY 2025

Row #		DAC-GT	CSGT	TOTAL	
1	Budget Forecast for PY 2025	$ 1,519,833	$ -	**$ 1,519,833**	*Table 1, row 15*
2	*Unspent funds from PY 2023*	$ (11,573)	$ (184,550)	**$ (196,124)**	*Table 2, row 15*
3	**Total Budget Request**	$ 1,508,260	$ (184,550)	**$ 1,323,710**	*row 1+2*

6. BUDGET CAPS

Resolution E-4999 establishes a budget cap of 10% of the total budget for program administration costs and a budget cap of 4% percent of the total budget for ME&O costs. The Resolution allows that the costs for administration and ME&O may be higher than these budget allocations in the first two years of program implementation (i.e, PY 2021 and 2022 for Ava's DAC-GT program). Resolution E-5125 further directed Program Administrators to submit any requests and accompanying rationale for any above-cap spending during the Annual Budget Advice Letter process. Ava provides information about the cost cap and any above-cap spending below.

Ava's 2023 actual spending for its DAC-GT and CSGT programs, provided in Table 2, exceeded the cost cap for the Program Administration Category. Ava does not anticipate exceeding the cost cap for DAC-GT in 2025. Ava hereby requests an adjustment to the Program Administration costs caps and provides the following rationale as required by Resolution E-52125.

Implementation of Ava's second Request for Offer (RFO) for DAC-GT and CSGT

For 2023, a primary driver of the DAC-GT and CSGT cost cap exceedance was program implementation costs related to Ava's second RFO for DAC-GT and CSGT resources. Ava did not receive any project bids during its initial procurement solicitation in 2021; subsequently, Ava launched a second solicitation on December 2, 2022. The 2023 work and associated costs included managing the solicitation and execution of Ava's power purchase agreements. Ava executed five long-term power purchase agreements ("PPAs") on February 22, 2024, for the full capacity allocation of its DAC-GT and CSGT programs. Costs for 2023 program administration represent a much greater share of total program costs than they otherwise would under steady-state program operations.

Timing of CSGT program launch

For 2023, a primary driver of the CS-GT cost cap exceedance is the fact that non-capped components of Ava's budget (i.e., Generation Cost Delta, 20% Bill Discount) are still $0 due to a delay in Ava's CSGT program launch. The percentage of admin and ME&O budget items are in relation to these other non-capped components, showing a disproportionate and inaccurate view. The 2023 actual costs included start-up costs required for launching CSGT, such as managing the solicitation and execution of five PPAs, monitoring project development, and mandatory compliance reporting.

Each of the explanations above relate directly to the fact that Ava's DAC-GT and CSGT programs are still in their start-up years for Ava's projects. Ava expects program administration costs to make up a much lower proportionate share of total program costs under steady-state operations which Ava anticipates happening in the next couple of years.

PROGRAM CAPACITY AND ENROLLMENT NUMBERS

Ava reports existing and forecasted program capacity and customer enrollment numbers for the DAC-GT program in the tables below. In 2025, Ava will continue to rely on an interim resource for its initial DAC-GT allocation of 5.726 MW and to offer the program at full enrollment levels. In addition, Ava has the ability to enroll approximately 100 more customers in the program after recalculating the DAC-GT customer's average monthly usage using 2023 actuals.

Existing Capacity and Customers Served as of Previous Program Year's Close

Category	PY 2023	
	DAC-GT	CSGT
Existing capacity (MW)	5.726	0
Customers served (#)	2,940	0

Forecasted Capacity and Enrollment

Category	PY 2025
	DAC-GT
Estimated capacity to be procured (MW)	5.726
Estimated customer enrollment (#)	3,028

7. COST RECOVERY AND FUND TRANSFER PROCEDURES

Once the Commission approves Ava's budget request in Advice Letter 47-E, PG&E will be responsible for including the total budget request for Ava's DAC-GT program in its current ERRA Forecast application. Once PG&E receives approval of its ERRA Forecast from the Commission,

PG&E is advised to set aside the requested Ava budget in a sub-account of its DAC-GT balancing account. PG&E will then transfer program funds to Ava determined in OP 3 of Resolution E-5124.[6]

8. CONCLUSION

Ava respectfully requests the Commission approve the budgets proposed herein and direct PG&E to transfer funds sufficient to meet Avas approved annual budgets per the funding mechanisms discussed above.

[6] Resolution E-5124, Ordering Paragraph 3 at 32.

APPENDIX B

Marketing, Education and Outreach Plan for the Disadvantaged Communities Green Tariff for Program Year 2025

Proposed by Ava Community Energy

Eleanor Smith

Account Rates and Equity Manager

Ava Community Energy

1. PURPOSE AND GOALS

In October 2021, Ava Community Energy ("Ava"), formally known as East Bay Community Energy ("EBCE"), began automatically enrolling qualifying customers into its "solar discount" Disadvantaged Community Green Tariff ("DAC-GT") program which provides participants on income-qualifying CARE or FERA rates with an additional 20% discount on electricity. Since then, the targeted customer marketing, education, and outreach ("ME&O") has consisted largely of notifying DAC-GT customers about their enrollment status by sending welcome packets and email notification. Ava's 2025 ME&O strategy has five main goals:

1. Educate auto-enrolled customers about the DAC-GT program;
2. Enroll eligible customers in the DAC-GT program;
3. Increase awareness of, and enrollment in, CARE and FERA programs;
4. Increase customer awareness of bill assistance programs, energy use, savings opportunities, other customer incentives, discounts, or programs; and
5. Address barriers to program participation and leverage best practices to participation and ensure that outreach to DAC and hard-to-reach customers is accessible and equitable.

Ava will measure ME&O program success in 2025 by the number of customers enrolled in the DAC-GT program and the diversity of customers reached. The following subsections provide additional details about Ava's 2025 ME&O approach for the DAC-GT program.

2. TARGET AUDIENCE

Given enrollment specifications around the programs, the primary target audience for the ME&O strategy is existing and eligible CARE/FERA customers living in DACs pursuant to CalEnviroScreen ("CES") 3.0 and 4.0. Resolution E-5212[1] approves Ava's Petition for Modification of Resolution E-4999 allowing program administrators to include data for the CES version when the PA's implementation plan was approved. For Ava, this means that CES 3.0 and 4.0 are valid versions to utilize for outreach and project siting.

The following zip codes are in the top 25% of CES scores according to CES 3.0:

- 94710 – Berkeley
- 94608 – Emeryville
- 94544 – Hayward
- 94545 – Hayward
- 95330 - Lathrop
- 94560 – Newark
- 94601 – Oakland
- 94603 – Oakland

[1] Issued on October 6, 2022.

- 94606 – Oakland
- 94607 – Oakland
- 94612 – Oakland
- 94621 – Oakland
- 94577 – San Leandro
- 94578 – San Leandro
- 95202 – Stockton
- 95203 – Stockton
- 95204 – Stockton
- 95205 – Stockton
- 95206 – Stockton
- 95207 – Stockton
- 95210 – Stockton
- 95212 – Stockton
- 95215 – Stockton
- 95376 – Tracy
- 95304 – Tracy
- 94587 – Union City

The following zip codes are in the top 25% of CES scores according to CES 4.0:

- 95330 - Lathrop
- 94601 - Oakland
- 94603 - Oakland
- 94606 - Oakland
- 94607- Oakland
- 94608 - Oakland
- 94609 - Oakland
- 94612 - Oakland
- 94621 - Oakland
- 94577 - San Leandro
- 94578 - San Leandro
- 95202 – Stockton
- 95203 – Stockton
- 95204 – Stockton
- 95205 – Stockton
- 95206 – Stockton
- 95210 – Stockton
- 95376 – Tracy

3. ME&O TACTICS AND STRATEGIES

The following tactics and strategies will be utilized to support DAC-GT customers in 2025.

a. Communications and Media Content

For customer outreach purposes, Ava's DAC-GT program has been branded by Ava as Ava's "Solar Discount" program. A variety of marketing and outreach materials were developed to help explain the program to customers. These materials have been translated into Spanish and Chinese to ensure a more culturally competent and effective communication. In addition, Ava maintains a dedicated web landing page for its DAC-GT program on Ava's website which can be found at avaenergy.org/solar-discount/.

b. Auto-Enrolled Customer Education

In Resolution E-5124, the Commission authorized eligible customers to be automatically enrolled into the DAC-GT program. As a result, Ava has not conducted traditional program outreach for DAC-GT. In order to educate auto-enrolled customers about participation in the DAC-GT program and increase awareness of the CARE and FERA programs, Ava provides direct notifications and a Welcome Kit. Enrollment notifications are sent via email and direct mail to customers who are automatically enrolled in the program, prior to the customers' receipt of their first bill displaying the DAC-GT program discount. The welcome letters were also translated into Spanish and Chinese. The kits contain:

- Welcome Letter;
- Frequently Asked Questions document;
- Prospective Power Content Label;
- Price, Terms and Conditions document; and
- Energy Bill Assistance brochure.

APPENDIX C

(ENTIRE APPENDIX C IS CONFIDENTIAL)

APPENDIX D

DECLARATION OF ELEANOR SMITH IN SUPPORT OF CONFIDENTIAL TREATMENT OF DATA SUBMITTED AS PART OF AVA COMMUNITY ENERGY'S ADVICE LETTER TO PRESENT THE BUDGET AND MARKETING, EDUCATION, AND OUTREACH PLAN FOR ITS 2025 DISADVANTAGED COMMUNITIES GREEN TARIFF PROGRAM RATE

I, Eleanor Smith, declare:

1. I am the Account Rates and Equity Manager at Ava Community Energy ("Ava") and am authorized to sign this declaration on Ava's behalf. This declaration is being filed in support of Ava's Advice Letter No. 49-E ("Advice Letter").

2. Pursuant to General Order 96B, General Rule 10.3, Ava requests confidential treatment for budget information and procurement data (the "Confidential Information") that is being provided to Energy Division in Appendix C to the Advice Letter.

3. The Confidential Information has, to the best of my knowledge, not been publicly disclosed.

4. Appendix C is confidential in its entirety; the Confidential Information it contains cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

5. This Confidential Information should be treated as confidential because it includes the following types of information:

- Front three years of electric load forecast information protected by the ESP & CCA Matrix, Section III in Decision (D.) 06-06-066, as modified by D.07-05-032, D.08-04-023, D.20-07-005, and D.21-11-029.
- Market-sensitive information regarding the current market position and compliance obligations of Ava, including, without limitation, procurement obligation quantities, procured quantities, entities with whom Ava's negotiated and transacted, and price-related information that are all market sensitive information under section 454.5(g) of the California Public Utilities Code and other state laws.
- Customer-specific data, which may include demand, loads, names, addresses, and billing data protected under Pub. Util. Code § 8380; Civ. Code §§ 1798 et seq.;

Govt. Code §§ 7927.700 and 7930.180; Public Util. Code § 8380; D.14-05-016, D.04-08-055, and D.06-12-029.

- Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data protected under Civ. Code §§3426 et seq.; Govt. Code §§ 7924.510(c), 7927.300, 7927.605(a), 7927.705, and 7930.205; Evid. Code §1060; D.11-01-036.

6. Accordingly, Ava requests that the Confidential Information be treated as confidential for a period of two years from the date of this declaration.

7. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. In addition, interested parties can obtain this information from Ava directly by signing a nondisclosure agreement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 8th day of July, 2024, in Oakland, California.

/s/ Eleanor Smith

Eleanor Smith