

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
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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) #: Ava 55-E, PG&E 7460-E, BayREN 30-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 2025 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Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: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: 1/19/25 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: Senior Regulatory & Data 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

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1999 Harrison Street, Suite 2300
Oakland, CA 94612

December 20, 2024

Advice Letter No. 55-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 2025 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 this 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 55-E, PG&E 7460-E, and BayREN 30-E.

Background

On October 22, 2021, Ava[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, 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

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[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.

among itself, BayREN and PG&E.[3] Resolution E-5215 further directed that Ava submit future Joint Cooperation Memorandums 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 2025 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 19, 2025, 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 9, 2024, which is 20 calendar days after the date of this submittal. Protests should be mailed to the following address:

CPUC Energy Division

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

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 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@avaenergy.org

For PG&E:

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

For BayREN:

Jane Elias
Section Director, Energy Programs
Association of Bay Area Governments
375 Beale Street, 7th floor
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
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Ava Community Energy
1999 Harrison St, Ste 2300
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510-641-0950

December 20, 2024

Cc: Service List R.13-11-005
Pamela.Rittelmeyer@cpuc.ca.gov
EDTariffUnit@cpuc.ca.gov
PGETariffs@pge.com

Attachment A

Ava Community Energy, Pacific Gas and Electric Company, and Bay Area Regional Energy Network Joint Cooperation Memorandum for Program Year 2025 Energy Efficiency Programs

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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 2025 JCM marks the third JCM filed by all three parties. It reflects the ongoing coordination efforts that have been established and successfully implemented to date, ensuring the prevention of double-dipping and minimizing market confusion across programs.

Some programs may not be included in this JCM at the time of this publication, since they are still undergoing Solicitations and Negotiations. Any new Program launched during the span of this JCM will be communicated within the Ava, BayREN, PG&E Coordination meetings and protocols to ensure all Program Administrators are aware.

This updated JCM includes the summaries of comparable BayREN, PG&E, and Ava commercial and industrial 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 2025). 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 offers different incentive pathways depending on the needs of the customer: normalized metered energy consumption (NMEC) pay-for-performance (P4P), custom, and deemed. For the NMEC incentive pathways, the program is designed to target and engage a select group of Ava's non-residential, large, high usage (>1MM kWh annual usage) customers to provide the following services:

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

Not every customer that we engage with this for this program will be best suited for the NMEC pathway. In such cases, the program provides alternative options such as custom or deemed incentives.

BayREN Small Medium Commercial Buildings (SMCB) Program

The BayREN Small and Medium Commercial Buildings (SMCB) program consists of two subprograms: BayREN Business and BayREN Refrigerant Replacement (BRRR).

BayREN Business (BayREN06)

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[1]. 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

[1] D.23-06-055, pg. 52-54, Hard To Reach definition: 512907396.PDF

In addition, businesses located in California Native American Tribes' territory and businesses owned/operated by the tribe or tribal members are HTR.

BayREN Refrigerant Replacement (BRRR) Program (BayREN10)

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 food-service and floral sector businesses. Businesses must be independently owned, non-franchise and operate at least one remote condensing refrigeration system with high global warming potential refrigerant charge. Examples of small food services include sit-down and take-out restaurants, small grocery and corner stores, bars, and community kitchens. Additionally, businesses must be HTR, using the same HTR criteria as the BayREN Business program. Businesses that do not qualify for HTR must meet the geographic eligibility criteria in one of two ways:

- located in the Bay Area's low-income communities[2], or
- located in a Disadvantaged Community (DAC)

PG&E NetOne Comprehensive Commercial Program (PGE_Com_003)

Implementer: Ecology Action

The NetOne Program is designed to serve customers with over 20kW annual usage, with a primary focus on the commercial sector including large offices, large retail, grocery, food storage, warehousing, multi-use buildings, and restaurants. NetOne utilizes both Population and Site-based normalized metered energy consumption platforms (NMEC) as well as supporting measures through the deemed workflow. Some of the target measures are Interior and Exterior Lighting, ASH Control, Refrigerated Case Doors, Heat Pump Water Heaters, and HVAC Controls.

NetOne is a direct install program that works directly with customers or through a trained Contractor Partner network. NetOne offers a full suite of services including technical and engineering support, project management, On-Bill Financing (OBF) rebate/incentive processing, and both Population and Site NMEC pathways. NetOne has a specific focus on the Medium to Large Commercial Sector and Multi-site customers and serves the entire PG&E territory.

PG&E Advanced Energy Program for High Tech & Bio Tech Efficiency Program (PGE_Com_004)

Implementer: Resource Innovations

The Advanced Energy Program is a customer-centric demand side management (DSM) program offering tailored solutions for high-tech and biotech (HTBT) customers.

[2] Low-income communities are shown on the California Climate Investments Priority Populations map.

The program focuses on identifying and implementing energy efficiency opportunities in the unique HTBT sector, with facility types ranging from multi-site campus retrofits to laboratory, clean room, and data center upgrades. Additionally, the program offers extensive guidance on control upgrades, and retro-commissioning (RCx) to optimize existing equipment, scheduling, and control sequences while shifting demand away from local and system peak periods.

The Advanced Energy Program targets medium to large high-tech and bio-tech facilities but is available to smaller customers in the sector as well. Typical projects have ranged from 10,000 sq. ft of small offices to millions of sq. ft across high-tech and bio-tech campus facilities. Annual electric consumption from customer projects has ranged from several hundred thousand kWh to tens of millions of kWh. The program has typically been a building controls-centric program with HVAC systems as its primary technology focus. This program has primarily leveraged the customized incentive process but provides support for Deemed and NMEC projects, as well as assistance with PG&E's On-Bill Financing on an as-needed basis with customers.

PG&E Healthcare Energy Fitness Initiative (PGE_Com_005)

Implementer: Resource Innovations

The Healthcare Energy Fitness Initiative (HEFI) is a customer-centric demand side management (DSM) program that offers tailored solutions for PG&E's healthcare customers including public or private inpatient (hospital), outpatient (clinics), and residential living facilities. HEFI focuses on the highest potential end uses in the healthcare segment, including HVAC retrofits, controls, and optimization – including central heating, cooling, and steam plants; lighting fixtures and advanced lighting controls; process and equipment loads, refrigeration, and plug loads.

The Healthcare Energy Fitness Initiative program targets medical facilities primarily for medium and large customers but is available to smaller customers in the sector as well. Typical projects have ranged from small medical office building spaces with lighting upgrades to multi-year central plant replacement efforts. This is a building controls-centric program with HVAC systems as its primary technology focus. This program has primarily leveraged the customized incentive process but provides support for Deemed and NMEC projects, as well as assistance with PG&E's On-Bill Financing on an as-needed basis with customers.

PG&E Measured Savings for Summer Reliability Program (PGE_Com_006)

Implementer: Alternative Energy Systems Consulting (AESC)

The primary objective of PG&E's MSSR is to permanently reduce summer peak demand with particular focus on the highest net peak hours, e.g., 7-9 PM spanning the months of June through September, through energy efficiency and other IDSM measures that reduce load, using a population-based NMEC approach. Non-residential customers include medium and large private sector commercial facility customers such as retail, real estate, grocery, convenience, restaurant, lodging, warehouses, and refrigerated warehouses. Facilities generally range from 10 to 100 kW in demand capacity size. Eligible customers may access PG&E's On-Bill Financing on an as-needed basis. This program is expected to expand to support single-family dwellings by late Q1 2025.

PG&E Simplified Savings Program (PGE_Com_SmallBiz)

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 Energy Efficiency (EE)option report on the day of the visit. Customers will then have the option to take advantage of 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 motors (ECMs).

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

Implementer: CLEAResult

SEM is a holistic, long-term, whole facility approach that uses advanced implementation, measurement, and verification services and tools to determine energy savings from all program activities at the facility, including capital projects, maintenance and operation improvements, and retrocommissioning. Participants receive coaching to develop their own energy management practices that will persist beyond their engagement with the program. The methodology and program requirements were defined through a collaborative effort between the IOUs, CPUC, and external subject matter experts.[3]

The CLEAResult SEM Food Processing program serves food processors and producers and takes a whole-facility approach that uses NMEC and dynamic baseline modeling to determine energy savings from all program activity at the facility, including capital projects, custom and deemed calculated retrofits, maintenance and operation, and retrocommissioning projects. The program requires a multi-year customer commitment to participation in multiple cohort training workshops, individual or cohort energy analysis, and measurement and verification (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

SEM is a holistic, long-term, whole facility approach that uses advanced implementation, measurement, and verification services and tools to determine energy savings from all program activities at the facility, including capital projects, maintenance and operation improvements, and retrocommissioning. Participants receive coaching to develop their own energy management practices that will persist beyond their engagement with the program. The methodology and program requirements were defined through a collaborative effort between the IOUs, CPUC, and external subject matter experts[4].

[3] D.23-02-002 https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M501/K931/501931085.PDF

[4] D.23—02-002 https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M501/K931/501931085.PDF

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 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 1-on-1 training workshops, individual energy analysis, and measurement and evaluation (M&V) activities based on information and characteristics of the facility's specific processes.

PG&E Industrial Systems Optimization Program (PGE_Ind_003)

Implementer: Cascade Energy

The Industrial Systems Optimization Program (ISOP) targets the industrial manufacturing, food processing, petroleum, chemical, and mineral 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.

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**	**2025 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	$4,725,499	Resource Acquisition	x	x	x	x	x	x	x	x	x	x	x
BayREN10	BayREN Refrigerant Replacement Program	Commercial	$4,617,614	Equity	x	x			x	x	x				x
PGE21012	Commercial Calculated Incentives	Commercial	$ $25,000	Resource Acquisition	x	x	x		x	x	x	x	x		x
PGE21021	Industrial Calculated Incentives	Industrial	$108,416	Resource Acquisition											
PGE21012	Commercial Deemed Incentives	Commercial	$ $492,070	Resource Acquisition	x	x	x	x	x			x		x	x
PGE_Com_003	NetOne Comprehensive Commercial Program	Commercial	$ $4,499,846	Resource Acquisition	x		x	x	x	x	x	x	x	x	x
PGE_Com_004	High Tech & Bio Tech Efficiency Program	Commercial	$ $1,389,898	Resource Acquisition	x		x	x	x	x	x	x	x	x	x
PGE_Com_005	Healthcare Energy Fitness Initiative	Commercial	$ $1,155,590	Resource Acquisition	x		x	x	x	x	x	x	x	x	x
PGE_Com_006	Measured Savings for Summer Reliability Program.	Commercial	$ $10,000,000	Resource Acquisition	x		x		x	x	x	x	x	x	x
PGE_Ind_001a	Strategic Energy Management – Food Processing	Industrial	$6,570,202	Resource Acquisition	x				x	x	x	x			x

PGE_Ind_001a	Strategic Energy Management – Manufacturing	Industrial	$7,875,805	Resource Acquisition	x				x	x	x	x			x
PGE_Ind_03	Industrial Systems Optimization Program	Industrial	$4,047,179	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	$ $3,500,000	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, and coordinate throughout the year to update each other on program developments, and discuss duplication and double dipping prevention among their EE program offerings.

In the 2024 JCM, the coordination efforts between Ava, PG&E, and BayREN centered on check-in meetings, program referrals, and double dipping prevention measures such as performing routine project data sharing and including customer attestations on program documents.

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

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. See referral tree on page 15.

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 a small volume of commercial and industrial customers, 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 2025, 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 ensure no EE measures are claimed for these same customers.

Additionally, Ava will coordinate with PG&E on Total System Benefit (TSB) and financial forecasts on a quarterly basis, as described below.

- Quarterly TSB Forecasts: Ava shall submit to the PG&E program manager four quarterly TSB forecast updates every year from the Ava EE program.
- 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 1,000,000-kWh and includes incentives for electrification. It would be unusual 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 and floral sector 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 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 City and zip code 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.

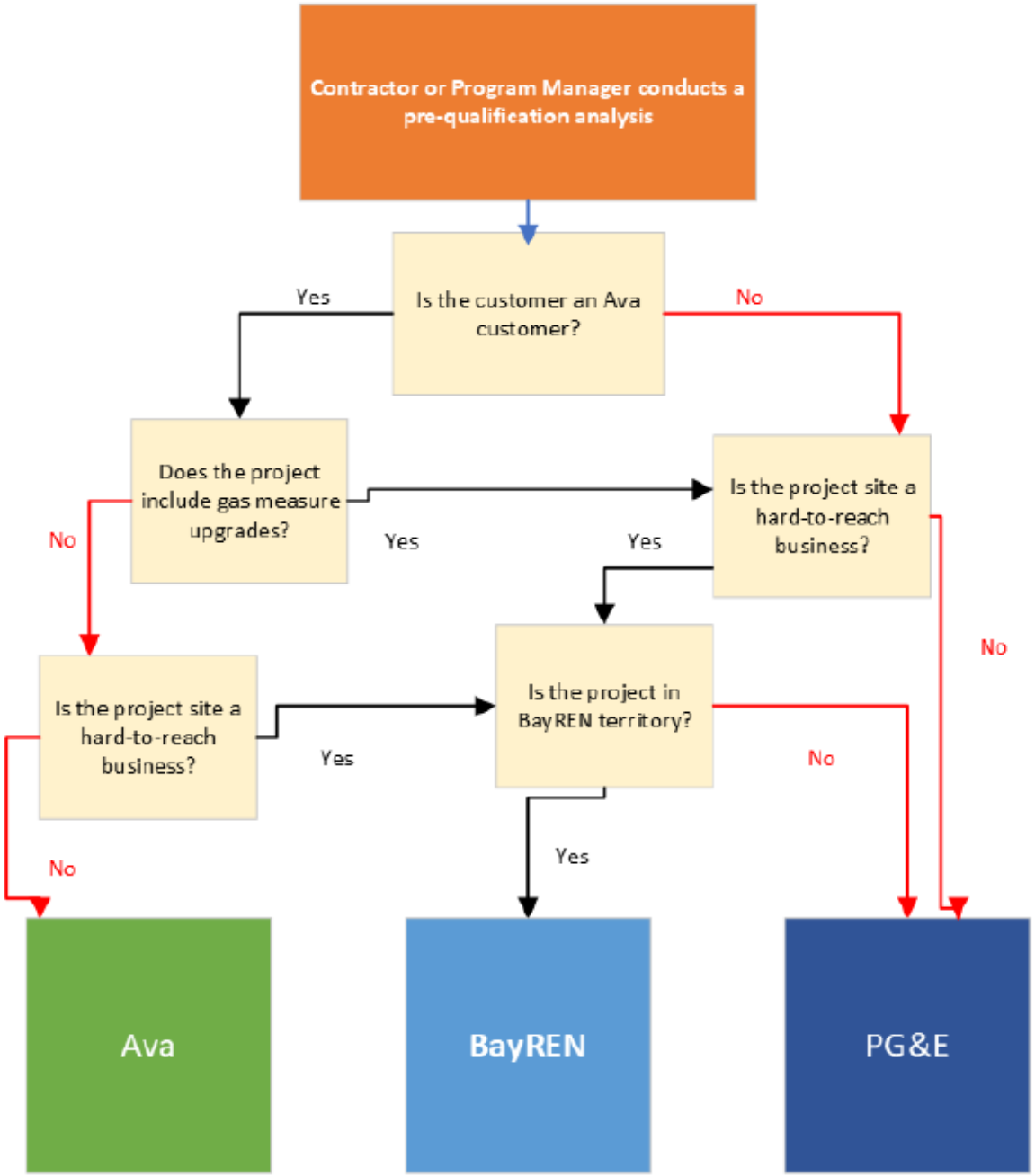
Contractor or Program Manager conducts a pre-qualification analysis
Is the customer an Ava customer?
Yes
No
Does the project include gas measure upgrades?
No
Yes
Is the project site a hard-to-reach business?
Yes
No
Is the project site a hard-to-reach business?
Yes
Is the project in BayREN territory?
No
No
Yes
Ava
BayREN
PG&E

Figure 1. Customer Referral Tree