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

# Ava Community Energy Authority
# ELC (Corp ID 201)
# Status of Advice Letter 59E
**As of May 13, 2025**

Subject: Present Budget and Marketing, Education, and Outreach Plan for Ava Community Energy's

Division Assigned: Energy

Date Filed: 04-01-2025

Date to Calendar: 04-18-2025

Authorizing Documents: D1806027

Authorizing Documents: E-4999

Authorizing Documents: E-5125

| | |
|---|---|
| **Disposition:** | **Accepted** |
| **Effective Date:** | **05-01-2025** |

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Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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:
☑ 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) #: 59-E (PUBLIC VERSION) Tier Designation: 2

Subject of AL: Present Budget and Marketing, Education, and Outreach Plan for Ava Community Energy's 2026 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: AVA DAC-GT 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: 5/1/25 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

PUBLIC VERSION

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

| | |
|---|---|
| CPUC, Energy Division<br>Attention: Tariff Unit<br>505 Van Ness Avenue<br>San Francisco, CA 94102<br>Email: EDTariffUnit@cpuc.ca.gov | Name: Todd Edmister<br>Title: Senior Director of Public Policy and Deputy General Co<br>Utility Name: Ava Community Energy<br>Address: 1999 Harrison Street, Suite 2000<br>City: Oakland<br>State: California Zip: 94610<br>Telephone (xxx) xxx-xxxx: 510-650-7579<br>Facsimile (xxx) xxx-xxxx:<br>Email: tedmister@avaenergy.org |
| | Name:<br>Title:<br>Utility Name:<br>Address:<br>City:<br>State: California Zip:<br>Telephone (xxx) xxx-xxxx:<br>Facsimile (xxx) xxx-xxxx:<br>Email: |

Clear Form

PUBLIC VERSION

Todd Edmister
Senior Director of Public Policy and
Deputy General Counsel

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

April 1, 2025

**Advice No. 59-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 2026 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 on June 22, 2018, Resolution E-4999, issued on June 3, 2019, Resolution E-5125, issued on August 5, 2021, and OP 3(i) of D. 24-05-065, *Decision Modifying Green Access Programs and Adopting a Community Renewable Energy Program,* issued on June 7, 2024, Ava Community Energy ("Ava") hereby submits this Advice Letter ("AL") to seek approval of the 2026 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.

a. **Purpose**

Through this AL, Ava seeks CPUC approval of its budget request for program year ("PY") 2026 for the DAC-GT program. Per Resolution E-4999, the budget request includes both the budget reconciliation for the previous PY (i.e. 2024) and the budget forecast for the upcoming PY (i.e. 2026). In addition to the budget request, Ava submits its ME&O plan for PY 2026 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 #3 to Ava's Implementation Plan and Statement of Intent, pursuant to which Ava began serving the City of Stockton and City of Lathrop in April 2025.[2] On December 20, 2024, the Commission certified Addendum #4 to Ava's Implementation Plan and Statement of Intent, pursuant to which Ava will begin serving unincorporated San Joaquin County in 2026. 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.

[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.

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]

On September 11, 2020, Ava filed its Tier 3 Advice Letter 14-E establishing its DAC-GT and CSGT programs. The AL filed included Ava's Implementation Plan, program budget, and ME&O Plan for program years 2020 - 2021. On December 18, 2020, Ava filed a Supplemental Advice Letter outlining DAC-GT and CSGT capacity transfer from non-participating CCAs to participating CCAs.[5] On October 18, 2024, Ava and PG&E submitted a joint AL to transfer DAC-GT capacity from PG&E to Ava to accommodate Ava's expansion to the cities of Stockton, Lathrop, Newark, and Tracy.[6]

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 February 1st of every year, starting in 2020, for the next program year.[7] Resolution E-5125 ordered that these Annual Budget Advice Letters be elevated from Tier 1 to a Tier 2 designation.[8] On June 7, 2024, the CPUC issued D. 24-05-065 changing the annual budget advice letter submission date to April 1st.[9]

### C. Discontinuation of CSGT Program

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*. 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 includes the CSGT Program in its 2024 budget reconciliation for the previous PY but not its budget forecast for the upcoming PY (i.e. 2026).[10]

## Discussion

Ava's DAC-GT amended budget forecast and ME&O plan for Program Year 2026 are attached to this Advice Letter in the following appendices:

[3] D.18-06-027 at p.104 (OP 17).
[4] Resolution E-4999 at p.16.
[5] Advice Letter14-E-A, approved by the Commission on April 15, 2021.
[6] Ava AL 53-E/PG&E AL 7410-E, approved by the Commission on November 18, 2024.
[7] Resolution E-4999 at p. 67 (OP 2).
[8] Resolution E-5125 at p. 11 (OP 3).
[9] D.24-05-065 at p.170 (OP 3)..
[10] Note that the 2024 budget includes CSGT numbers for cost recovery purposes.

- Appendix A: Budget Forecast for the Disadvantaged Communities Green Tariff Program for the Program Year 2026;

- Appendix B: Marketing, Education and Outreach Plan for the Disadvantaged Green Tariff Program for Program Year 2026;

- Confidential Appendix C: Workpapers; and

- 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 information under ESP & CCA Matrix, Section III in Decision (D.) 06-06-066, as modified (load forecasts); Pub. Util. Code §454.5(g) (procurement plans); Civ. Code §§3426 et seq. (trade secrets); Evid. Code §1060 (trade secrets); and 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), and 7930.205 (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.16-07-015
Service List: A.22-05-022
Joshua Litwin (Energy Division)

# APPENDIX A

PUBLIC VERSION

# Budget Forecast for the Disadvantaged Communities Green Tariff for the Program Year 2026

Proposed by Ava Community Energy




PUBLIC VERSION

## 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,* guidance provided in Resolutions E-4999 and E-5124, and OP 3(i) of D. 24-05-065, *Decision Modifying Green Access Programs and Adopting a Community Renewable Energy Program*, Ava Community Energy ("Ava") hereby submits its 2026 budget request for the Disadvantaged Communities Green Tariff ("DAC-GT") program. The 2026 budget request covers the budget reconciliation for the previous program year ("PY"), 2024, and the forecasted budget for the upcoming PY, 2026.

On June 7, 2024, the Commission issued D.24-05-065 which discontinued the Community Solar Green Tariff ("CSGT") program and consolidated allocated capacity into a modified DAC-GT program. In accordance with this decision, Ava's budget request does not include forecasted 2026 CSGT costs but does include a reconciliation of prior 2024 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 OP 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;

[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 Commission'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.

b. Information technology ("IT");
c. Billing operations;
d. Regulatory compliance; and
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 excludes community choice aggregator ("CCA") integration costs from our 2026 program budget. Instead, PG&E includes CCA integration costs in its 2025 budget advice letter forecast for program year 2026. The integration costs process is outlined in PG&E AL 6872-E and is intended to streamline the integration costs process amongst five CCAs and PG&E.

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 ( "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 2026

For PY 2026, Ava forecasts program spending to total $6,903,240 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 2026

| Row # | Category | DAC-GT |
|---|---|---|
| 1 | **Generation Cost Delta** | $ 4,326,339 |
| 2 | **20% Bill Discount** | $ 2,434,749 |
| 3 | Program Administration | |
| 4 | Program Management | $ 36,146 |
| 5 | Information Technology | $ - |
| 6 | Billing Operations | $ 41,200 |
| 7 | Regulatory Compliance | $ 19,509 |
| 8 | Procurement | $ 28,435 |
| 9 | **Subtotal Program Administration** | $ 125,290 |
| 10 | Marketing, Education & Outreach | |
| 11 | Labor Costs | $ 3,881 |
| 12 | Outreach and Materials | $ 12,981 |
| 13 | **Subtotal ME&O** | $ 16,863 |
| 14 | **Total** | $ 6,903,240 |

Ava provides the following clarifying notes regarding the budget summary.

A. *Generation Cost Delta*

Costs associated with the generation cost delta in Ava's PY 2026 forecast are based on both the 2026 cost of Ava's own DAC-GT projects and the 2026 cost of executed and forecasted interim resources, specifically:

- Ava has several contracted DAC-GT projects that are expected to come online by or throughout 2026; these projects will provide energy to a portion of Ava's existing DAC-GT customers.
- Ava has executed an interim resource contract for a DAC-GT resource in 2026 to provide enough energy for the remainder of customers currently enrolled in Ava's DAC-GT program.
- Ava is forecasting an additional interim resource in 2026 to service customers up to Ava's full DAC-GT program capacity of 18.54 megawatts ("MW").

Ava's 2026 budget request for generation cost delta is higher than previous years' budget requests. There are two primary drivers for the increase in the budget:

- Ava's DAC-GT program capacity more than doubled in 2024, increasing by 11.25 MW from a total program capacity of 7.29 MW to a total program capacity of 18.54 MW.[4] The Commission approved transfer of 11.25 MWs from PG&E to Ava was driven by Ava's expansion to the cities of Stockton, Lathrop, Newark, and Tracy which significantly increased the number of DAC-GT customers both currently enrolled in and eligible for the DAC-GT program under Ava. Ava will rely on interim resources to service the additional DAC-GT customers up to its new program cap.
- Ava revised its methodology for forecasting generation cost delta in order to correctly capture Ava's above market generation costs for interim resources. The revised methodology is described in more detail below under "Budget Reconciliation for PY 2024."

B. *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.[5] Hence, Ava's budget forecast reflects the cost to provide the 20% bill discount to customers, based on the full electric bill, for PY 2026.

The 20% bill discount budget request is higher than previous years due to a significant increase in the number of customers that Ava will serve in 2026. This is driven by Ava's expansion of service to the cities of Stockton and Lathrop in April 2025.

C. *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. 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.

D. *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 into the DAC-GT program.

[4] Ava AL 53-E/PG&E AL 7410-E.
[5] Resolution E-5124, at 24.

## 4. BUDGET RECONCILIATION FOR PY 2024

The table below compares Ava's PY 2024 budget forecast[6] to actual program expenses incurred in 2024. 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 2024, Ava spent more than the requested amounts in its PY 2024 budget forecast.

Table 2. Budget Reconciliation for Program Year 2024

| Row # | Category | DAC-GT | | | CSGT | | |
|---|---|---|---|---|---|---|---|
| | | Forecast | Actual | True-up | Forecast | Actual | True-up |
| 1 | **Generation Cost Delta** | $ 748,026 | $ 1,370,400 | $ 622,374 | $ - | $ - | $ - |
| 2 | **20% Bill Discount** | $ 845,333 | $ 709,753 | $ (135,580) | $ - | $ - | $ - |
| 3 | Program Administration | | | | | | |
| 4 | Program Management | $ 31,166 | $ 30,714 | $ (452) | $ 20,231 | $ 7,877 | $ (12,354) |
| 5 | Information Technology | $ - | $ - | $ - | $ 50,000 | $ - | $ (50,000) |
| 6 | Billing Operations | $ 35,190 | $ 31,200 | $ (3,990) | $ 1,407 | $ - | $ (1,407) |
| 7 | Regulatory Compliance | $ 11,540 | $ 26,187 | $ 14,648 | $ 11,540 | $ 3,810 | $ (7,729) |
| 8 | Procurement | $ 27,035 | $ 14,566 | $ (12,469) | $ 27,035 | $ 1,299 | $ (25,736) |
| 9 | CCA Integration Costs | $ - | | $ - | $ - | $ - | $ - |
| 10 | **Subtotal Program Administration** | $ 104,931 | $ 102,667 | $ (2,263) | $ 110,213 | $ 12,986 | $ (97,227) |
| 11 | Marketing, Education & Outreach | | | | | | |
| 12 | Labor Costs | $ 2,161 | $ 2,661 | $ 500 | $ 9,218 | $ - | $ (9,218) |
| 13 | Outreach and Materials | $ 2,500 | $ 7,041 | $ 4,541 | $ 17,500 | $ - | $ (17,500) |
| 14 | **Subtotal ME&O** | $ 4,661 | $ 9,703 | $ 5,041 | $ 26,718 | $ - | $ (26,718) |
| 15 | **Total** | **$ 1,702,951** | **$ 2,192,523** | **$ 489,572** | **$ 136,930** | **$ 12,986** | **$ (123,944)** |

The primary driver of Ava's 2024 overspent funds is a revision in Ava's methodology for calculating generation cost delta. Previously, Ava's methodology utilized only the interim resource REC cost and failed to include energy and resource adequacy ("RA") in the above market generation cost. Ava's updated methodology utilizes the sum of energy, RA, and interim resource REC costs which is an accurate calculation of the above market generation cost. Since Ava's revised approach now reflects the above market cost to Ava of procuring a DAC-GT resource, it allows Ava to receive the appropriate amount of cost recovery for its DAC-GT resources and continue to participate in the DAC-GT program. Additionally, Ava's revised approach now aligns with how other CCAs participating in DAC-GT calculate generation cost delta.

## 5. 2026 BUDGET REQUEST

Ava includes in the table below the true-up balances from Program Year 2024 and applies them to the budget request for 2026. Based on the budget forecast for PY 2026 presented in section 3 and the budget reconciliation for PY 2024 presented in section 4, Ava is requesting a total budget of $7,268,867 for the DAC-GT program in this budget AL.

[6] Ava's PY 2024 budget request was submitted on May 1, 2023 as Ava AL 39-E-B. AL 39-E-B was accepted by the Commission's Energy Division and has an effective date of June 1, 2023.

Table 3. Final Requested Budget for PY 2026

| Row # | | DAC-GT | CSGT | TOTAL | |
|---|---|---|---|---|---|
| 1 | Budget Forecast for PY 2026 | $ 6,903,240 | $ - | $ 6,903,240 | *Table 1, row 15* |
| 2 | *True-up funds from PY 2024* | $ 489,572 | $ (123,944) | $ 365,627 | *Table 2, row 15* |
| 3 | **Total Budget Request** | $ 7,392,811 | $ (123,944) | $ 7,268,867 | *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 2024 actual spending and Ava's 2026 forecast spending for its DAC-GT program does not exceed the budget cost caps. Ava's 2024 actual spending for its CSGT program exceeded the cost cap of the Program Administration which was due to a delay in Ava's CSGT program launch, followed by the discontinuation of the program.

**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. The capacity from PY 2024 combines Ava's initial DAC-GT capacity of 5.726 MW with its CSGT capacity of 1.5623 MW, for a total of 7.289 MW. The forecasted capacity from PY 2026 includes an additional 11.25 MW from Ava AL 53-E.

In 2026, Ava will use energy from both its own DAC-GT resources and interim resources to offer the program at full enrollment levels. This will allow Ava to service ~6,500 more customers across its expanded service territory.

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

| Category | PY 2024 |
|---|---|
| | DAC-GT |
| Existing capacity (MW) | 7.289 |
| Customers served (#) | 2,940 |

**Forecasted Capacity and Enrollment**

| Category | PY 2026 |
|---|---|
| | DAC-GT |
| Estimated capacity to be procured (MW) | 18.54 |
| Estimated customer enrollment (#) | 9,456 |

## 7. COST RECOVERY AND FUND TRANSFER PROCEDURES

Once the Commission approves Ava's budget request in Advice Letter 59-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.[7]

## 8. CONCLUSION

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

[7] Resolution E-5124 at 32 (OP 3).

# APPENDIX B

PUBLIC VERSION

# Marketing, Education and Outreach Plan for the Disadvantaged Communities Green Tariff for Program Year 2026

Proposed by Ava Community Energy




Eleanor Smith

Account Rates and Equity Manager

Ava Community Energy

PUBLIC VERSION

## 1. PURPOSE AND GOALS

In October 2021, Ava Community Energy ("Ava"), formerly 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 2026 ME&O strategy has the following goals:

- Enroll eligible customers in the DAC-GT program;
- Educate auto-enrolled customers about the DAC-GT program;
- Increase customer awareness of bill assistance programs, energy use, savings opportunities, other customer incentives, discounts, or programs; and
- Address barriers to program participation and ensure that DAC-GT enrollment is equitable via Ava's auto-enrollment approach

Ava will measure ME&O program success in 2026 by the number of customers enrolled in the DAC-GT program and the diversity of customers reached. The following sections provide additional details about Ava's 2026 ME&O approach for the DAC-GT program.

## 2. TARGET AUDIENCE

Given enrollment specifications around the program, 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 approves Ava's Petition for Modification of Resolution E-4999 allowing program administrators ("PA") 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
- 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/.

**1.**

### 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 bill assistance programs, Ava provides direct notifications and a Welcome Kit. Enrollment notifications are sent via email and/or 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; and
- Energy Bill Assistance brochure

# APPENDIX C

# (ENTIRE APPENDIX C IS CONFIDENTIAL)

PUBLIC VERSION

# APPENDIX D

PUBLIC VERSION

**DECLARATION OF ELEANOR SMITH IN SUPPORT OF CONFIDENTIAL TREATMENT OF DATA SUBMITTED AS PART OF AVA COMMUNITY ENERGY'S ADVICE LETTER 59-E TO PRESENT THE BUDGET AND MARKETING, EDUCATION, AND OUTREACH PLAN FOR ITS 2026 DISADVANTAGED COMMUNITIES GREEN TARIFF PROGRAM RATE AND THE COMMUNITY SOLAR 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. 59-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.
- 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 1st day of April, 2025, in Oakland, California.

*/s/ Eleanor Smith*

Eleanor Smith