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

Ava Community Energy Authority
ELC (Corp ID201)
Status of Advice Letter 64E
As of January 15, 2026

Subject: Ava's 2026 Joint Cooperation Memorandum for Program Year 2026 Energy Efficiency Programs

Division Assigned: Energy

Date Filed: 12-11-2025

Date to Calendar: 12-19-2025

Authorizing Documents: E-5215

Disposition:	**Accepted**
Effective Date:	**01-10-2026**

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:
edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:
Claire Huang
510-759-5269
chuang@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Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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 ID 201**

Utility type:

☑ ELC ☐ GAS ☐ WATER

☐ PLC ☐ HEAT

Contact Person: **Claire Huang**
Phone #: 510-759-5269
E-mail: **chuang@avaenergy.org**
E-mail Disposition Notice to: **chuang@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 64-E, PG&E 7780-E, BayREN 33-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 2026 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: **1/10/26** 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: Claire Huang
Title: Regulatory Analyst II
Utility/Entity Name: Ava Community Energy

Telephone (xxx) xxx-xxxx: 510-759-5269
Facsimile (xxx) xxx-xxxx:
Email: chuang@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

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

December 11, 2025

Advice Letter No. 64-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 2026 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 64-E, PG&E 7780-E, and BayREN 33-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.[3]

---

[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.
[3] Resolution E-5366, issued on January 30, 2025, found that the budgets for the energy efficiency programs of several Community Choice Aggregators, including Ava, were miscalculated, corrected the budgets, and directed Ava to revert to the corrected budget. Ava returned the overallocated budget to PG&E and notified the service lists of R.13-11-005, A.17-01-013, and A.22-02-005 on April 23, 2025 via AL 60-E.

On September 15, 2022, the Commission issued Resolution E-5215, which certified Ava's EE Plan over a three-year period. 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 among itself, BayREN and PG&E.[4] Resolution E-5215 further directed that Ava submit future JCMs aligned with Annual Reports for program years 2023, 2024, and 2025. Ava's program launched in May 2023 and will sunset in May 2026, so a JCM is required for program year 2026 as well.

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 2026 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 10, 2026, 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 and Rulemaking 25-04-010.

---

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

Protests

Anyone wishing to protest this filing may do so by filing a protest with the Commission, Ava, PG&E, and BayREN by December 31, 2025, which is 20 calendar days after the date of this submittal. Protests should be mailed to the following address:

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

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

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

For Ava:

Claire Huang
Regulatory Analyst II
Ava Community Energy
1999 Harrison St, Ste 2300
Oakland, CA 94612
510-759-5269
chuang@avaenergy.org

For PG&E:

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

For BayREN:

Jane Elias
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 Claire Huang at (510) 759-5269 or by electronic mail at chuang@avaenergy.org.

/s/ Claire Huang
Claire Huang
Regulatory Analyst II
Ava Community Energy
1999 Harrison St, Ste 2300
Oakland, CA 94612
510-759-5269

December 11, 2025

Cc: Service List R.13-11-005
Service List R.25-04-010
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 2026 Energy Efficiency Programs

Table of Contents

Background and Purpose of JCM ***3***

Commercial and Industrial Sector Overlapping Programs ***3***

Ava Building Efficiency Accelerator Program 3

BayREN Small Medium Commercial Buildings (SMCB) Program 4

BayREN Refrigerant Replacement (BRRR) Program (BayREN10) 5

PG&E NetOne Comprehensive Commercial Program (PGE_Com_003) 5

PG&E Advanced Energy Program for High Tech & Bio Tech (PGE_Com_004) 5

PG&E Healthcare Energy Fitness Initiative Program (PGE_Com_005) 6

PG&E Measured Savings for Summer Reliability Program (PGE_Com_006) 6

PG&E Simplified Savings Program (PGE_Com_SmallBiz) 6

PG&E: Commercial Strategic Energy Management (PGE_Com_009) 7

PG&E Strategic Energy Management (SEM) – Food Processing (PGE_IND_001a) 7

PG&E Strategic Energy Management (SEM) – Manufacturing (PGE_IND_001b) 7

PG&E Industrial Systems Optimization Program (PGE_Ind_003) 8

PG&E On-Bill Financing Offerings (PGE21091, PGE210911) 8

PG&E Commercial Calculated Incentives Program (PGE21011) 8

PG&E Industrial Calculated Incentives Program (PGE21021) 9

PG&E Commercial Deemed Incentives Program (PGE21012) 9

Coordination Efforts ***12***

Customer Choice 12

Program Referrals 12

Ava and PG&E Coordination 12

Ava and BayREN Coordination 13

Additional Double Dipping Prevention 13

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 2026 JCM marks the fourth 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.

Ava's commercial energy efficiency program is scheduled to conclude in May of 2026. This will be the final JCM filing, consistent with Resolution E-5215.

Service Territories

Ava's service territory is comprised of all of Alameda County as well as the City of Tracy and the City of Stockton. Ava will begin serving unincorporated San Joaquin County in 2026. The entirety of Ava's service area overlaps 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), industrial strategic energy management (SEM), custom, and deemed. For the commercial NMEC and SEM 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 program will be best suited for the commercial NMEC or industrial SEM pathways. In such cases, the program provides alternative options such as custom or deemed incentives.

Since enrollment for the commercial NMEC and industrial SEM pathways have concluded, Ava will focus efforts exclusively on deemed heat pump water heater (HPWH) incentives in 2026. The target customers for this incentive include larger commercial buildings, such as hospitals, hotels, grocery stores, refrigerated various, etc.

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 is a resource acquisition program serving SMCB using population-level, normalized metered energy consumption (NMEC) approach. The program began in 2020 and by 2022, it shifted 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) businesses 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 potential participants in this category and provides technical assistance and energy efficiency rebates to businesses in retail, professional offices, restaurants, gyms/multi-use buildings, and grocery/corner stores.

Within Ava territory, BayREN Business will focus on HTR businesses[1]. A business is considered HTR if it is in a Disadvantaged Community (DAC)[2] and meets one of the criteria below. Or, if the business is outside of a DAC, it 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" (business 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.

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

In 2026, BayREN Business will expand eligibility criteria to serve more businesses. First, the program will increase the annual electricity consumption threshold from 150,000 kWh to 300,000 kWh or less while keeping the annual 50,000 therms limit unchanged. Second, in addition to serving HTR businesses, the program will also serve businesses located in low-income communities (LIC)[3]. Businesses that do not qualify for HTR must meet the geographic eligibility criteria in one of two ways:

- located in the Bay Area's LICs, or
- located in a DAC.

Lastly, in 2026, BayREN Business intends to increase the number of projects with fuel-substitution measures. Notably, the program will focus on replacing natural gas water heaters under 80 gallons with 120VAC or 240VAC heat pump water heaters in SMCB that have less hot water demand like offices and retails stores.

---

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

[2] A DAC is in the top 25th percentile according to CalEnviroScreen 4.0: https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/

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

BayREN Refrigerant Replacement (BRRR) Program (BayREN10)

The BRRR Program is an equity program serving SMCB in food and floral sectors using direct install approach. The program primarily focuses on replacing environmentally harmful halocarbon refrigerants with less harmful refrigerants, including natural refrigerants. The program also advances refrigeration energy efficiency retrofits where the participating business pays little 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 and floral sector businesses. Eligible businesses must operate at least one remote condensing refrigeration system with high global warming potential (>1800 GWP) refrigerant. Examples of food sector business include sit-down and take-out restaurants, small grocery and corner stores, drinking 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 LIC[4], or
- located in a DAC.

PG&E NetOne Comprehensive Commercial Program (PGE_Com_003)

Implementer: Ecology Action

The NetOne Commercial Efficiency Program is a downstream program that provides energy efficiency services, technical services, and incentive processing. Primarily serving the commercial real estate, hospitality, grocery and retail markets, NetOne provides a suite of incentives to commercial customers to install heat pump water heaters, refrigeration, HVAC, lighting, and meter-based energy savings using the Deemed, Custom, and NMEC platforms. The program also offers On Bill Financing to promote customer participation. The broad offering also puts NetOne in the position of accepting project types and sizes from a wide variety of market segments.

PG&E Advanced Energy Program for High Tech & Bio Tech (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.

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

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

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 Program (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 HEFI 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 Measured Savings for Summer Reliability Program primary objective is to reduce peak kW demand utilizing a meter-based approach with a strategic mix of measures and targeted load shapes to maximize Total System Benefit (TSB) delivery. The goal is to provide a customer and aggregator friendly platform for customers of all sizes to leverage a full range of customer-enabling behavioral and retrofit strategies to shift and reduce load. Inclusion of On-Bill and alternative financing expands not only project scope but also the customer pool to capture stranded savings.

PG&E Simplified Savings Program (PGE_Com_SmallBiz)

Implementer: Resource Innovations

The Simplified Savings Program is PG&E's equity segment program, which provides marketing, outreach, and education, as well as direct install services, financing, and incentives for a traditionally underserved segment. Simplified Savings focuses on customers with a demand of less than 50kW and located within a CalEnviroscreen Disadvantaged Community (DAC). Hard to Reach (HTR) customers who meet the demand requirements but are not located within a DAC community may also qualify for the program. Bill reduction and customer engagement are the primary measures of success of this equity program. Simplified Savings intends to engage 7,500 micro- and small business customers over its current three-year term.

PG&E: Commercial Strategic Energy Management (PGE_Com_009)

Implementer: Stillwater Energy

The Commercial Strategic Energy Management (CSEM) program is a holistic, long-term, whole facility approach that uses a meter-based measurement and verification methodology to determine energy savings from all program activities at the facility, including capital projects, maintenance and operation improvements, as well as retrocommissioning. Participants receive coaching to develop their own energy management practices that will persist beyond their engagement with the program. Stillwater emphasizes a cohort-based approach where participants learn together and from each other through knowledge sharing and networking.

The program launched in Q2 2025 and serves the Commercial, Institutional, and Public segments including, but not limited to, higher education, K-12 schools, government, hospital, lodging, office, grocery, commercial multifamily, warehouses not associated with manufacturing sites, and other healthcare. Recruitment efforts take care to work around sub-segments already served by comparable programs, such as the Statewide HEEP program. Measures typical within CSEM program include HVAC (both heating and cooling), lighting, server closets, water pumping for buildings, water heating, and plug load.

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.[5]

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

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

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[6].

The Manufacturing Strategic Energy Management (SEM) program is a third-party strategic energy management program specifically targeting industrial manufacturers and is a holistic, whole facility approach that uses NMEC 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 uses 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)

Implementer: PG&E

OBF is a key enabler of energy savings across customer classes, providing zero-percent financing for qualifying EE retrofits, with loan payments appearing as fixed monthly charges on the customer's PG&E bill. OBF helps customers, who would otherwise have difficulty qualifying for commercial credit, get over the first-cost hurdle to EE investment, unlocking broader and deeper cost savings while supporting PG&E's energy savings targets. More information to support customers can be found on the OBF Website including eligibility and application.

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)

Implementer: PG&E

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.

---

[6] Ibid.

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)

Implementer: PG&E

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)

Implementer: PG&E

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

Program ID	Program Name	Sector	2026 Budget[7]	Segment	Measures										
					Lighting	Appliances	HVAC	Plug Load	Refrigeration	Custom	Lighting	HVAC Controls	Whole Building	Water Heating	Other
Ava01	Building Efficiency Accelerator	Commercial	$1,856,162.67	Resource Acquisition	x	x	x	x	x	x	x	x	x	x	x
BayREN06	BayREN Business Program	Commercial	$4,764,397	Resource Acquisition	x	x	x	x	x	x	x	x	x	x	x
BayREN10	BayREN Refrigerant Replacement Program	Commercial	$4,726,351	Equity	x	x			x	x	x				x
PGE21011	Commercial Calculated Incentives	Commercial	$ $39,594	Resource Acquisition	x	x	x		x	x	x	x	x		x
PGE21021	Industrial Calculated Incentives	Industrial	$39,000	Resource Acquisition	x	x	x		x	x	x	x	x		x
PGE21012	Commercial Deemed Incentives	Commercial	$ 559,594	Resource Acquisition	x	x	x	x	x			x		x	x
PGE_Com_003	NetOne Comprehensive Commercial Program	Commercial	$ $10,966,707	Resource Acquisition	x		x	x	x	x	x	x	x	x	x
PGE_Com_004	Advanced Energy Program for High Tech & Bio Tech	Commercial	$ $ 1,560,049	Resource Acquisition	x		x	x	x	x	x	x	x	x	x
PGE_Com_005	Healthcare Energy Fitness Initiative Program	Commercial	$1,795,743	Resource Acquisition	x		x	x	x	x	x	x	x	x	x
PGE_Com_006	Measured Savings for Summer Reliability Program.	Commercial	$5,160,298	Resource Acquisition	x		x		x	x	x	x	x	x	x

[7] 2026 PG&E Budgets were filed in Advice 5141-G/7752-E, PG&E's 2026-2027 Mid-Cycle Advice Letter, and can be found in detail on the 2026 PGE Budget Filing Dashboard - CEDARS (https://cedars.cpuc.ca.gov/filings/dashboard/PGE/2026/)

PGE_Ind_001a	Strategic Energy Management – Food Processing	Industrial	$6,360,512	Resource Acquisition	x				x	x	x	x			x		
PGE_Ind_001b	Strategic Energy Management – Manufacturing	Industrial	$11,315,408	Resource Acquisition	x				x	x	x	x			x		
PGE_Com_009	Commercial Strategic Energy Management	Commercial/Public	$1,460,493	Resource Acquisition	x				x	x	x	x			x		
PGE_Ind_003	Industrial Systems Optimization Program	Industrial	$5,110,785	Resource Acquisition	x		x		x	x	x	x			x		
PGE_OBFAP[8]	On-Bill Financing Alternative Pathway	On Billing Finance	$2,511,360	Market Support	x	x	x		x	x	x	x		x	x		
PGE_Com_Small Biz	Simplified Savings Program	Comm Micro Small Biz <50kw	$ $4,698,817	Equity	x		x	x	x	x	x	x		x			

[8] The On-Bill Financing Loan pool is a revolving fund. As loans are repaid by customers, the funds are lent out again. The 2026 budget listed on this table is not the total loan pool. More information can be found on the OBF Website (www.pge.com/obf)

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 energy efficiency program offerings.

In the 2025 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. Since Ava is no longer recruiting for commercial NMEC and industrial SEM cohorts, we expect program overlap to be minimal. For customers that are interested in commercial NMEC or industrial SEM pathways, Ava will refer potential prospects to BayREN's Business program or PG&E's commercial or industrial programs and coordinate with the appropriate project lead.

Ava and PG&E Coordination

Ava's Building Efficiency Accelerator program has shifted away from recruiting commercial and industrial customers for NMEC or SEM participation. The program is now focused exclusively on delivering HPWH incentives within Ava's service territory.

To prevent dual enrollment and ensure no customer receives duplicate incentives, Ava and PG&E will continue to rely on established data exchange protocols. These protocols allow both parties to securely share customer and project-level information, ensuring alignment on incentive eligibility and avoiding double counting of savings. Ava, PG&E, and Ava's program implementer executed a mutual data sharing Non-Disclosure Agreement (NDA), which remains in effect to enable the exchange of customer data related to HPWH incentives.

In 2026, PG&E will share with Ava a quarterly data file of customers who have received rebates or incentives for HPWHs. This data will enable Ava to check for overlaps and ensure customers are not receiving double incentives or services. In turn, Ava will securely provide PG&E with SA_IDs for customers who receive HPWH incentives through the Building Efficiency Accelerator program.

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

Given the eligibility criteria of each program, there was no overlap between Ava's Building Efficiency Accelerator program and the BayREN Business program. Any potential for overlap has since been discontinued as Ava has stopped recruiting commercial and industrial customers into the Accelerator and has pivoted the program exclusively toward HPWH incentives.

The BayREN Business program is a population-level, pay-for-performance incentive program, targeting hard-to-reach commercial entities as well as commercial entities located in DACs or LICs with annual usage <300,000-kWh and <50,000 therms. Given Ava's current HPWH incentive focus on larger facilities, there is minimal overlap between the two programs. Similarly, there is no overlap with BayREN's Refrigerant Replacement program.

While it would be unusual for a customer to appear in both programs, Ava and BayREN will continue to share general project data to verify against dual enrollment or double dipping. If BayREN receives an application for a customer site within Ava territory, BayREN will securely email the business name and City and zip code to Ava. Ava will review the customer to ensure they are not enrolled in the Accelerator program. Additionally, Ava will send BayREN the business name and address for each HPWH application received. BayREN will check these sites against their records to confirm that no-double-dipping has occurred. If overlap is identified, 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, 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.

Customer Referral Tree

Previously, Ava included a customer referral tree illustrating how potential customers could be directed to the BayREN, Ava, or PG&E programs based on eligibility. Since Ava has discontinued recruitment for the Accelerator program, Ava will now refer customers as follows:

- Medium and small businesses located within BayREN territory that identify as hard-to-reach (HTR), in disadvantaged communities (DACs), or in low-income areas will be referred to the BayREN Business Program.
- All other customers will be referred to the PG&E programs as appropriate1