Todd Edmister
Senior Director of Public Policy and
Deputy General Counsel

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

Rachel Peterson
Executive Director
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102-3298
Rachel.peterson@cpuc.ca.gov

Re: Ava Community Energy Request for Extension of Time to Comply with Resolution E-5200 Pursuant to Rule 16.6

Dear Ms. Peterson,

Pursuant to Rule 16.6 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, and consistent with the direction of the Energy Division, Ava Community Energy ("Ava") hereby respectfully requests a retroactive extension of time to comply with Ordering Paragraph ("OP") 6 of Resolution E-5200 (December 15, 2022).

Resolution E-5200 requires Community Choice Aggregators ("CCAs") participating in the Percentage of Income Payment Plan ("PIPP") pilot program approved in Decision ("D.") 21-10-012 that incur incremental administrative costs not recorded in the applicable Investor-Owned Utility's PIPP Memorandum Account to submit a Tier 2 Advice Letter seeking approval for cost recovery within thirty (30) days of publication of the PIPP pilot final evaluation report.[1]

The PIPP pilot program final evaluation report was published on March 17, 2025, following the grant of an extension for the filing of such report by the Executive Director on January 14, 2025.[2] Ava's Tier 2 Advice Letter was thus due on April 16, 2025. Ava submitted Advice Letter 67-E on February 13, 2026[3], following identification of an internal administrative oversight that resulted in the advice letter being filed after the deadline established in Resolution E-5200. The delay was not the result of any substantive disagreement with the Evaluation Report or the requirements of the PIPP pilot program. Upon identifying the oversight, Ava prepared and submitted the advice letter for Commission consideration.

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[1] D.21-10-012, OP 6. Pursuant to OP 3 of D.21-10-012, Ava jointly filed Tier 3 advice letter Ava AL 36-E on February 4, 2022, with Pacific Gas & Electric Company ("PG&E") and other participating CCAs in PG&E's distribution territory to propose pilot participation targets and caps, eligible high disconnection zip codes, a marketing, education, and outreach plan, a proposed budget and a cost recovery plan. The Commission approved Ava Advice Letter 36-E on December 15, 2022, in OP 1(a) of Resolution E-5200.

[2] R.18-07-005, Percentage of Income Payment Play Program Final Evaluation Report (Mar. 17, 2025) at 1 (citing partial extension request granted by Executive Director of the Commission on January 14, 2025 [sic]).

[3] Ava Advice Letter 67-E (February 13, 2026), attached hereto as Attachment 1, at p.2.

Through AL 67-E, Ava seeks cost recovery for incremental administrative costs incurred from January 2023 through March 2025 to implement the PIPP pilot program, consistent with D.21-10-012 and Resolution E-5200. Ava's delayed filing caused no harm to ratepayers or program administration, and the advice letter was submitted in good faith to ensure full compliance with Commission requirements.

Accordingly, Ava respectfully requests that the Commission grant a retroactive extension of time to comply with OP 6 of Resolution E-5200 to February 13, 2026, the date the advice letter was submitted. Ava further requests that, pursuant to Rule 1.2, the Commission waive the requirement in Rule 16.6 that extension requests be submitted at least five days in advance of the applicable deadline, for good cause shown and in the interest of securing a just, speedy, and inexpensive resolution of this matter.

For questions or to discuss this request, please contact Todd Edmister, Senior Director of Public Policy and Deputy General Counsel, at (510) 650-7582 or tedmister@avacenergy.org, and please copy Ava's Policy Coordinator, Kendall Downie, at kdownie@avaenergy.org.

Ava appreciates the Energy Division's consideration of this request.

Respectfully Submitted,

/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) 650-7582
Email: tedmister@avaenergy.org

cc: aljextensionrequest@cpuc.ca.gov
Service List for R.18-07-005

ATTACHMENT 1

AVA COMMUNITY ENERGY ADVICE LETTER 67-E
Submitted to the Energy Division on February 13, 2026



California Public Utilities Commission

ADVICE LETTER SUMMARY

ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: #201

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

Contact Person: Todd Edmister
Phone #: (510) 650-7582
E-mail: tedmister@avaenergy.org
E-mail Disposition Notice to: kdownie@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) #: 67-E

Tier Designation: 2

Subject of AL: Budget Request for Ava Community Energy's Percentage of Payment Income Plan (PIPP) Pilot Program

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 #:

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: 3/13/26

No. of tariff sheets: 0

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed[1]:

Pending advice letters that revise the same tariff sheets:

[1]Discuss in AL if more space is needed.

Clear Form

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

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

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

Telephone (xxx) xxx-xxxx: (510) 650-7582
Facsimile (xxx) xxx-xxxx:
Email: tedmister@avaenergy.org

Contact Name: Kendall Downie
Title: Public Policy Coordinator
Utility/Entity Name: Ava Community Energy

Telephone (xxx) xxx-xxxx: (510) 650-7582
Facsimile (xxx) xxx-xxxx:
Email: kdownie@avaenergy.org

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Clear Form

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtailable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

Clear Form

Todd Edmister
Senior Director of Public Policy and
Deputy General Counsel

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

February 13, 2026

Advice No. 67-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: Budget Request for Ava Community Energy's Percentage of Payment Income Plan (PIPP) Pilot Program

Purpose

Pursuant to Ordering Paragraph ("OP") 6 of Resolution E-5200[1], Ava Community Energy ("Ava") hereby submits this Tier 2 Advice letter ("AL") to seek cost recovery for incremental administrative costs incurred from January 2023 to March 2025 for the implementation of the PIPP pilot.

Background

On October 7, 2021, the California Public Utilities Commission ("Commission" or "CPUC") approved D.21-10-012 ("Decision"), authorizing the PIPP pilot program to reduce residential disconnections of electric and gas services. The PIPP pilot program sets a bill cap for a participant's utility bill payment based on their household's monthly income.

D.21-10-012 allows Community Choice Aggregators ("CCAs") to participate in the PIPP pilot program so long as the CCA is also participating in, or intends to participate in, the Arrearage Management Program ("AMP"). The Investor-Owned Utilities track bundled and unbundled electricity subsidy costs and remit the generation portion of electric subsidy costs to the participating CCA monthly. Pursuant to OP 3 of D.21-10-012, Ava jointly filed Tier 3 advice letter Ava AL 36-E on February 4, 2022, with Pacific Gas & Electric Company ("PG&E") and other participating CCAs in PG&E's service area to propose target enrollment level, eligible high disconnection zip codes, a marketing, education, and outreach plan, and a proposed budget. The Commission approved Ava AL 36-E on December 15, 2022 in OP 1(a) of Resolution E-5200.

Resolution E-5200 directs participating CCAs that incur incremental administrative costs that are not recorded in an IOU PIPP Memorandum Account to each file a Tier 2 AL within 30 days after the PIPP

[1] OP 6 of Resolution E-5200 orders Community Choice Aggregators that incur incremental administrative costs that are not recorded in the Investor-Owned Utilities Percentage of Income Payment Plan Memorandum Accounts to each file a Tier 2 Advice Letter to seek approval for cost recovery within 30 days after the Percentage of Income Payment Plan evaluation report is published.

Evaluation report is published. Incremental administrative costs are defined in D.21-10- 012 as costs "incurred solely for the purpose of implementing the PIPP pilots and do not include costs that would have been incurred in the course of administering the CARE program or other existing responsibilities of the utilities or CCAs".[2]

The PIPP pilot program final evaluation report was published on March 17, 2025. This advice letter is submitted after the 30-day period specified in Resolution E-5200 due to an administrative oversight and not as a result of any substantive disagreement with the Evaluation Report or the requirements of the PIPP pilot program. Upon identifying the oversight, this filing was promptly prepared and submitted for Commission consideration. Through this advice letter, Ava Community Energy seeks cost recovery for the administrative costs incurred from January 2023 through March 2025 for implementation of the PIPP pilot program.

Pursuant to General Order 96-B, General Rule 16.2, Ava Community Energy provides notice that this Tier 2 Advice Letter is submitted after the filing deadline established in Resolution E-5200. Ava has taken steps to ensure timely tracking of future compliance deadlines and respectfully requests acceptance of this late filing.

Budget Request

Ava hereby submits this cost recovery request for incremental administration expenses of $101,468 spent on implementation of the PIPP pilot program from January 2023 to May 2025. Ava anticipates submitting another Tier 2 advice letter at the conclusion of the PIPP Pilot Program, in July of 2027, to request cost recovery for program administration costs incurred during the remainder of the pilot duration.

Table 1 below shows a breakdown of costs by budget category and year.

Table 1: Ava PIPP Cost Recovery Request

Budget Category	2023	2024	2025 (Jan- Mar)	Total Costs
Program Administration	$ 20,373	$ 3,195	$ 746	$ 24,313
Billing Operations	$ 43,500	$ 18,000	$ 4,500	$ 66,000
Marketing, Education, and Outreach	$ 11,155	$ -	$ -	$ 11,155
Total Costs	**$ 75,028**	**$ 21,195**	**$ 5,246**	**$ 101,468**

Ava provides a brief description of each of the budget line items below.

Program Administration
Administrative costs include the cost of staff time associated with program management, regulatory compliance, marketing, and billing operations.

Billing Operations

[2] D.21-10-012 at 66.

Billing operations includes both one-time startup costs and ongoing maintenance costs charged by Sacramento Municipal Utility District (SMUD), Ava's third party billing service provider, for administration of the PIPP pilot program.

Marketing, Education, and Outreach (ME&O)
Ava conducted a PIPP enrollment campaign in 2023 to enroll and educate customers on the PIPP program. Ava was the only CCA in PG&E service territory to conduct its own PIPP enrollment campaign. Ava's enrollment campaign for the PIPP program included the following efforts:

- Direct and email outreach in English, Spanish, and Chinese to a subset of eligible customers; direct mail was co-branded with PG&E and included a business reply card for applying to PIPP
- Ava PIPP webpage which included a customer application form for online enrollments
- Two informational PIPP webinars co-hosted by Ava and PG&E; the webinar was recorded and posted to Ava's PIPP webpage
- Training Ava's Customer Service Representatives on the PIPP program including how to help eligible customers apply for the program
- Lottery to select participants; eligible applicants who were not selected were added to a program waitlist

Tier Designation

Pursuant to OP 6 of Resolution E-5200, this AL has a Tier 2 designation.

Effective Date

Ava Community Energy Authority ("Ava") requests that this Advice Letter ("AL 67-E") become effective on March 13, 2025, which is thirty (30) calendar days after the date of submittal.

Conclusion

Ava respectfully requests the Commission approve the cost recovery proposed herein and direct PG&E to transfer funds sufficient to meet Ava's approved program administration budget.

Protest

Anyone wishing to protest this AL filing may do so by sending a letter via U.S. Mail or electronically, either of which must be received no later than 20 days after the date of this advice filing. Protests should be mailed to:

California Public Utilities Commission
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) 650-7582
Email: tedmister@avaenergy.org

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 Todd Edmister by electronic mail at 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) 650-7582
Email: tedmister@avaenergy.org

cc: Service List: 18-07-005