

California Public Utilities Commission

ADVICE LETTER SUMMARY

ENERGY UTILITY

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

Company name/CPUC Utility No.: **Ava Community Energy 201**

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

Contact Person: **Todd Edmister**
Phone #: **510-650-7579**
E-mail: **tedmister@avaenergy.org**
E-mail Disposition Notice to: **kdownie@avaenergy.org**

EXPLANATION OF UTILITY TYPE
ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)
4/1/2026

Advice Letter (AL) #: **69-E** Tier Designation: 2

Subject of AL: **Present the Budget and Marketing, Education, and Outreach Plan for Ava Community Energy's 2027 Disadvantaged Communities Green Tariff Program Rate**

Keywords (choose from CPUC listing):

AL Type: [ ] Monthly [ ] Quarterly [ ] Annual [x] 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Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: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? [x] Yes [ ] No

If yes, specification of confidential information: **Confidential Appendix C: Workpapers**
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, 510-650-7579**

Resolution required? [ ] Yes [x] No

Requested effective date: **5/1/26** No. of tariff sheets: **0**

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]:

Pending advice letters that revise the same tariff sheets:

PUBLIC VERSION

[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: Director of Regulatory Affairs and Deputy General Counsel
Utility/Entity Name: Ava Community Energy

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

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

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

Todd Edmister
Senior Director of Public Policy and
Deputy General Counsel

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

April 1, 2026

Advice No. 69-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 2027 Disadvantaged Communities Green Tariff Program Rate

Pursuant to Ordering Paragraph ("OP") No. 17 of California Public Utilities Commission ("Commission" or "CPUC") Decision ("D.") 18-06-027, *Alternate Decision Adopting Alternatives to Promote Solar Distributed Generation in Disadvantaged Communities*, issued in Rulemaking ("R.") 14-07-002 on June 22, 2018, Resolution E-4999, issued on June 3, 2019, and Resolution E-5125, issued on August 5, 2021, Ava Community Energy ("Ava") hereby submits this Advice Letter ("AL") to seek approval of the 2027 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.

Purpose

Through this AL, Ava seeks CPUC approval of its budget request for program year ("PY") 2027 for the DAC-GT program. Per Resolution E-4999, the budget request includes both the budget reconciliation for the previous PY (i.e. 2025) and the budget forecast for the upcoming PY (i.e. 2027). In addition to the budget request, Ava submits its ME&O plan for PY 2027 as Appendix B.

Background

A. Ava Background

Ava, formerly known as East Bay Community Energy, 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, adding the cities of Stockton and Lathrop to Ava's service territory in April 2025. 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.[1] 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 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, offer 100% solar energy to customers and provide a 20% discount on the electric portion of the bill.

D.18-06-27 allows CCAs to develop their own DAC-GT and CSGT programs consistent with the requirements of the decision. Pursuant to OP 17 of D.18-06-027, Ava filed its Tier 3 implementation AL 14-E on September 11, 2020, to establish its DAC-GT and CSGT programs.[2]

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*.[3] The decision consolidates the CSGT program into a modified DAC-GT program. On October 18, 2024, Ava and Pacific Gas and Electric Company ("PG&E") submitted a joint AL to transfer DAC-GT capacity

[1] Resolution E-4907.
[2] Advice Letter 14-E-A, approved by the Commission on April 15, 2021.
[3] D.24-06-065 issued on June 7, 2024.

from PG&E to Ava to accommodate Ava's expansion to the cities of Stockton, Lathrop, Newark, and Tracy.[4]

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

Discussion

Ava's DAC-GT amended budget forecast and ME&O plan for Program Year 2027 are attached to this Advice Letter in the following appendices:

1. Appendix A: Budget Forecast for the Disadvantaged Communities Green Tariff Program for the Program Year 2027;

2. Appendix B: Marketing, Education and Outreach Plan for the Disadvantaged Green Tariff Program for Program Year 2027;

3. Confidential Appendix C: Workpapers; and

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

Request for Confidential Treatment

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

[4] Ava AL 53-E/PG&E AL 7410-E. Approved by the Commission on November 18, 2024.
[5] *Id.* at OP 2.
[6] Resolution E-5125 at 2.
[7] Decision 24-05-065 OP 3 at p. 170.

Conclusion

Ava respectfully requests that the Commission approve Ava's 2026 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 2027

Proposed by Ava Community Energy



PUBLIC VERSION

1. PURPOSE

On June 21, 2018, the California Public Utilities Commission (CPUC) approved ("D.")18-06-027 *Alternate Decision Adopting Alternatives to Promote Solar Distributed Generation in Disadvantaged Communities* ("DAC"), as directed by the California Legislature in Assembly Bill ("AB') 327 (Perea), Stats. 2013, Ch. 611. Pursuant to D.18-06-027, Community Choice Aggregators ("CCAs") may develop and implement their own DAC-GT programs.

Per Resolutions E-4999 and E-5124, Ava hereby submits its 2027 budget request for the Disadvantaged Communities Green Tariff ("DAC-GT") program. The 2027 budget request covers the budget reconciliation for the previous program year ("PY"), 2025 and the forecasted budget for the upcoming PY, 2027.

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

2. BACKGROUND

Per Resolution E-4999, annual program budgets must be presented by program and include the following budget line items:[1]

1. Generation cost delta, if any;[2]
2. 20 percent bill discount for participating customers[3];
3. Program administration costs:
    a. Program management;
    b. Information technology ("IT");
    c. Billing operations;
    d. Regulatory compliance; and
    e. Procurement.
4. Marketing, education and outreach ("ME&O") costs:

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[1] A detailed description of each budget line item can be found in Ava's Implementation Plan, submitted in Appendix A to Ava Advice Letter 14-E filed on September 11, 2020.

[2] Resolution E-4999 establishes that *above market* generation costs should include net renewable resource costs in excess of the otherwise applicable class average generation rate that will be used to calculate the customers' bills. In conversations with the CPUC's Energy Division after the release of the Resolution, it was clarified that this budget line item is intended to cover both a potential higher, as well as lower, cost of the DAC-GT/ CSGT resources than the otherwise applicable class average generation rate. Hence, the term is updated to state the "*Delta of generation costs* between the DAC-GT/ CSGT resources and the otherwise applicable class average generation rate."

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

a. Labor costs;
b. Outreach and material costs, including local community-based organization ("CBO")/sponsor costs.

Ava excludes CCA integration costs from our 2027 program budget. Instead, PG&E includes CCA integration costs in its 2026 budget advice letter forecast for program year 2027. The integration costs process is outlined in PG&E AL 6872-E and is intended to streamline the integration costs process amongst 5 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 ("CPUC" or "Commission") showing:

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

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

3. BUDGET FORECAST FOR PY 2027

For PY 2027, Ava forecasts program spending to total $7,063,513 for the DAC-GT program. Ava's 2027 forecast includes costs associated with expected increases in program enrollments and DAC-GT resources. 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] In 2025, Ava's program was undersubscribed relative to its full capacity. In 2027, Ava plans to enroll additional customers up to the program cap of 18.54 MW through a combination of purpose-built projects and interim resources. A detailed budget forecast by budget line item can be found in the table below.

[4] Ava AL 53-E/PG&E AL 7410-E

Table 1. Budget Forecast for Program Year 2027

Row #	Category	DAC-GT
1	**Generation Cost Delta**	$ 4,703,257
2	**20% Bill Discount**	$ 2,153,618
3	Program Administration	
4	Program Management	$ 32,340
5	Information Technology	$ -
6	Billing Operations	$ 35,700
7	Regulatory Compliance	$ 26,243
8	Procurement	$ 95,711
9	**Subtotal Program Administration**	$ 189,993
10	Marketing, Education & Outreach	
11	Labor Costs	$ 1,644
12	Outreach and Materials	$ 15,000
13	**Subtotal ME&O**	$ 16,644
14	**Total**	$ 7,063,513

Ava provides the following clarifying notes regarding the budget summary.

Generation Cost Delta

Costs associated with the generation cost delta in Ava's PY 2027 forecast are based on the cost of purpose-built projects that are expected to come online by 2027, as well as the forecasted cost of additional interim resources that will allow Ava to service customers up to Ava's full DAC-GT program capacity of 18.54 MW.

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 2027.

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

[5] Resolution E-5124, at 24.

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.

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. BUDGET RECONCILIATION FOR PY 2025

The table below compares Ava's PY 2025 budget forecast[6] to actual program expenses incurred in 2025. 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 2025, Ava spent more than the requested amounts in its PY 2025 budget forecast.

Table 2. Budget Reconciliation for Program Year 2025

Row #	Category	DAC-GT		
		Forecast	Actual	True-up
1	**Generation Cost Delta**	$ 698,485	$ 520,013	$ (178,473)
2	**20% Bill Discount**	$ 733,031	$ 1,096,577	$ 363,545.89
3	Program Administration			
4	Program Management	$ 25,927	$ 23,704	$ (2,223)
5	Information Technology	$ -	$ -	$ -
6	Billing Operations	$ 32,105	$ 34,950	$ 2,845
7	Regulatory Compliance	$ 7,841	$ 16,460	$ 8,619
8	Procurement	$ 13,457	$ 108,346	$ 94,888
9	**Subtotal Program Administration**	$ 79,331	$ 183,460	$ 104,130
10	Marketing, Education & Outreach			
11	Labor Costs	$ 3,986	$ 4,175	$ 189
12	Outreach and Materials	$ 5,000	$ 6,363	$ 1,363
13	**Subtotal ME&O**	$ 8,986	$ 10,538	$ 1,552
14	**Total**	**$ 1,519,833**	**$ 1,810,588**	**$ 290,755**

Ava's 2025 overspend was primarily driven by its expansion of service to the cities of Stockton and Lathrop in April 2025. Ava transitioned all customers who had previously been enrolled in Pacific Gas and Electric (PG&E)'s DAC-GT program into Ava's DAC-GT program to ensure customers retained their DAC-GT bill discount when defaulting to Ava service. The additional

[6] Ava AL 49-E: "Present the Budget and Marketing, Education, and Outreach Plan for Ava Community Energy's 2025 Disadvantaged Communities Green Tariff Program Rate."

DAC-GT enrollments increased the 20% bill discount cost.

The overspend was partially offset by the lower than forecasted cost of interim resources. Ava's 2025 interim resources included RPS-eligible resources from Ava's Voluntary Allocation and Market Offer (VAMO) portfolio, in excess of RPS compliance obligations, and a RPS-eligible resource purchased through a short-term agreement.

5. 2027 BUDGET REQUEST

Ava includes in the table below the true-up balances from Program Year 2025 and applies them to the budget request for 2027. Based on the budget forecast for PY 2027 presented in section 3 and the budget reconciliation for PY 2025 presented in section 4, Ava is requesting a total budget of $7,354,267 for the DAC-GT program in this budget AL.

Table 3. Final Requested Budget for PY 2027

Row #		DAC-GT	
1	Budget Forecast for PY 2027	$ 7,063,513	*Table 1, row 15*
2	*True-up funds from PY 2025*	$ 290,755	*Table 2, row 15*
3	**Total Budget Request**	$ 7,354,267	*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 program administration costs in 2025 accounted for 11.5% of the total budget. The budget overage was partly driven by higher costs related to Ava's increase in enrollments and expanded capacity,[7] including the cost of preparing a new DAC-GT Request for Offers (RFO) which will be issued in 2026. In addition, Ava includes $24,432 of CCA integration costs in its budget cap calculations. CCA integration costs exceeded typical levels, primarily due to CPUC requirements to conduct a cost analysis of automated billing.[8] Ava's 2027 forecast spending for its DAC-GT program does not exceed the budget cost caps.

[7] Ava AL 53-E/PG&E AL 7410-E

[8] Decision 24-05-065, Ordering Paragraph 12 at 174.

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. On February 22, 2024, Ava executed five power purchase agreements for 7.28 MW of Ava's initial DAC-GT allotted program capacity. The projects are expected to come online starting in 2026. Therefore, in 2025, enrolled customers were served with interim solar resources.

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

Category	PY 2025
	DAC-GT
Capacity procured (MW)	7.289
Customers served (#)	4,274

In 2027, Ava will use energy from its purpose-built DAC-GT resources and from interim resources, where necessary, to offer the program at full enrollment levels. This will allow Ava to service approximately 7,777 customers across its expanded service territory.

Forecasted Capacity and Enrollment

Category	PY 2027
	DAC-GT
Estimated capacity to be procured (MW)	18.54 MW
Estimated customer enrollment (#)	7,777

7. COST RECOVERY AND FUND TRANSFER PROCEDURES

Once the Commission approves Ava's budget request in Advice Letter 69-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.[9]

8. CONCLUSION

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

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

APPENDIX B

PUBLIC VERSION

Marketing, Education and Outreach Plan for the Disadvantaged Communities Green Tariff for Program Year 2027

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"), formally known as East Bay Community Energy ("EBCE"), began automatically enrolling qualifying customers into its "solar discount" Disadvantaged Community Green Tariff ("DAC-GT") program which provides participants on income-qualifying CARE or FERA rates with an additional 20% discount on electricity. Since then, the targeted customer marketing, education, and outreach ("ME&O") has consisted largely of notifying DAC-GT customers about their enrollment status by sending welcome packets and email notification. Ava's 2027 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
- Ensure that DAC-GT enrollment is equitable via Ava's auto-enrollment approach

Ava will measure ME&O program success in 2027 by the number of customers enrolled in the DAC-GT program and the diversity of customers reached. The following subsections provide additional details about Ava's 2027 ME&O approach for the DAC-GT program.

2. TARGET AUDIENCE

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

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

[1] Issued on October 6, 2022.

- 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
- 95215 – Unincorporated San Joaquin County
- 95206 – Unincorporated San Joaquin County
- 95242 – Unincorporated San Joaquin County
- 95330 – Unincorporated San Joaquin County
- 95336 – Unincorporated San Joaquin County

3. ME&O TACTICS AND STRATEGIES

The following tactics and strategies will be utilized to support DAC-GT customers in 2027.

a. Communications and Media Content

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

b. Auto-Enrolled Customer Education

In Resolution E-5124, the Commission authorized eligible customers to be automatically enrolled into the DAC-GT program. As a result, Ava has not conducted traditional program outreach for DAC-GT. In order to educate auto-enrolled customers about participation in the DAC-GT program and increase awareness 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

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 69-E TO PRESENT THE BUDGET AND MARKETING, EDUCATION, AND OUTREACH PLAN FOR ITS 2027 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. 69-E ("Advice Letter").

2. Pursuant to General Order 96-B, 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, 2026, in Oakland, California.

/s/ Eleanor Smith
Eleanor Smith
Account Rates and Equity Manager

CERTIFICATE OF SERVICE

I, Judy Pau, certify:

I am employed in the City and County of San Francisco, California, am over eighteen years of age and am not a party to the within entitled cause. My business address is 50 California Street, 23rd Floor, San Francisco, California 94111.

On April 1, 2026, I caused the following to be served:

AVA COMMUNITY ENERGY (ID 201) ADVICE LETTER 69-E - PRESENT THE BUDGET AND MARKETING, EDUCATION, AND OUTREACH PLAN FOR AVA COMMUNITY ENERGY'S 2027 DISADVANTAGED COMMUNITIES GREEN TARIFF PROGRAM RATE (PUBLIC VERSION)

via electronic mail to all parties on the attached service lists Rulemaking 14-07-002/A.16-07-015 and A.22-05-022 who have provided the Commission with an electronic mail address.

Executed on April 1, 2026, in San Francisco, California.

/s/Judy Pau
Judy Pau

VIA EMAIL

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