PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

September 19, 2022

Advice Letter 28-E-A

Mellissa Brandt
East Bay Community Energy
1999 Harrison St, Suite 800
Oakland, CA 94612

SUBJECT: East Bay Community Energy Election to Administer Energy Efficiency Program

Dear Ms. Brandt:

Advice Letter 28-E-A is effective as of September 15, 2022

Sincerely,

Leuwam Tesfai

Leuwam Tesfai
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division



California Public Utilities Commission

ADVICE LETTER SUMMARY

ENERGY UTILITY

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

Company name/CPUC Utility No.: **East Bay Community Energy/ #201**

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

Contact Person: **Feby Boediarto**
Phone #: **510-650-7582**
E-mail: **fboediarto@ebce.org**
E-mail Disposition Notice to: **fboediarto@ebce.org**

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: **28-E-A**

Tier Designation: **3**

Subject of AL: **East Bay Community Energy Election to Administer Energy Efficiency Program**

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 #:
D. 14-01-033, D. 21-05-031

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: **28-E**

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? [ ] Yes [x] 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? [x] Yes [ ] No

Requested effective date: No. of tariff sheets:

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

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: **Feby Boediarto**
Title: **Regulatory Analyst**
Utility Name: **East Bay Community Energy**
Address: **1999 Harrison Street, Suite 800**
City: **Oakland**
State: California Zip: **94610**
Telephone (xxx) xxx-xxxx: **510-650-7582**
Facsimile (xxx) xxx-xxxx:
Email: **fboediarto@ebce.org**

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

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

March 10, 2022

Advice No. 28-E-A
(East Bay Community Energy ID 201)

California Public Utilities Commission
Energy Division
Attention: Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102-3298

Subject: **East Bay Community Energy Election to Administer Energy Efficiency Program**

PURPOSE

California Public Utilities Commission Decision ("D.") 14-01-033, *Decision Enabling Community Choice Aggregators to Administer Energy Efficiency Programs* ("the Decision"), established the rules for Community Choice Aggregators ("CCAs") to file advice letters to administer energy efficiency programs for their own customers under California Public Utilities Code Sections 381.1(e)-(f).[1] East Bay Community Energy ("EBCE") submits this Tier 3 Advice Letter to seek Commission certification under Sections 381.1 (e) and (f) to administer one energy efficiency program, a Commercial Pay-for-Performance ("P4P") Program, as described in further detail below. All necessary supporting documentation is attached hereto.

BACKGROUND

EBCE is a Joint Powers Authority formed on December 1, 2016, pursuant to California Government Code §§ 6500 *et. seq.* by the County of Alameda and all cities incorporated therein, as well as the City of Tracy. The Commission certified EBCE's Implementation Plan on November 8, 2017. EBCE 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 EBCE'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 EBCE's service territory beginning in 2021. EBCE is currently one of the largest CCAs in the state.

[1] All subsequent references to code sections are to the Cal. Pub. Util. Code.

EBCE serves over 576,000 residential accounts, 57,000 non-residential accounts, and 5,000 municipal accounts in Alameda County and in Tracy, California. EBCE is committed to providing clean energy options for its diverse community.

The CalEnviroScreen 4.0 tool identifies 40 census tracts in EBCE's service area that score within the top 25% of communities with the highest burden. Those 40 census tracts have a population total of 167,203. Additionally, EBCE currently provides service to over 120,000 residential accounts participating in CARE and over 4,000 in FERA, accounting for over 20% of EBCE's accounts.[2]

On October 22, 2021, EBCE submitted an Energy Efficiency Advice Letter following the cost-effectiveness guidelines originally approved in D.21-05-031. However, the Energy Division rejected EBCE's use of the portfolio segmentation approach and EBCE was directed to bring the entire portfolio up to 1.0 TRC.[3] As a result, EBCE received a notice of suspension for the previously submitted Advice Letter (28-E) for 120 days from when the suspension notice was received. The Advice Letter and Program Plan below now meet the cost-effectiveness requirements laid out in D.14.01.033 by removing the Low- and Moderate-Income Energy Efficiency program in the following attachments.

With this Advice Letter, EBCE exercises its statutory authority to become an administrator of funds for energy efficiency and conservation programs.[4] EBCE's Energy Efficiency Program Plan ("Plan"), is attached hereto and discussed in more detail below. Funding to implement the plan will be collected from EBCE ratepayers through a non-bypassable charge authorized by the Commission.

SUMMARY OF PLAN

The Plan is for one program: the Commercial Pay-for-Performance (P4P) Program. In administering this program, EBCE will be leveraging its experience and existing resources from current pilots of similar program concepts. This should support the timely and efficient launch of the proposed portfolio.

COMMERCIAL P4P PROGRAM

EBCE's program will leverage emerging P4P program approaches to offer cost-effective projects for its non-residential customer accounts. Projects will focus on high-potential opportunities for peak load management and building electrification. EBCE will use its existing data and analytics capabilities to assist program implementers in identifying the highest opportunity projects. EBCE will pay incentives for cost-effective savings measured at the meter with the CalTRACK methodologies.

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[2] 06/2021 data

[3] Per email received from staff at the Energy Division of the California Public Utilities Commission, 11/30/2021.

[4] California Public Utilities Code §381.1.

Deliverables

The program will provide a marketplace approach, where qualified vendors are allowed to submit projects and receive incentives on a portfolio of projects. There will be a high emphasis on demand management strategies, including permanent baseload reduction as well as controls-based load shifting approaches. Customers will be educated on the potential impacts of time-of-use ("TOU") rates and offered tools and strategies for adapting their business model to new rate structures, as they emerge.

Though not necessarily an exhaustive list, EBCE proposes to support the installation of the following measure types:

- Refrigeration controls
- Lighting measures
- Building envelope
- Retro-commissioning
- Building electrification measures: Heat pump water heating, space heating, and induction cooking technologies
- Load management strategies (controls, programmable thermostats, smart appliances)

EBCE's will explore and incorporate new offerings over time that will advance and align with state goals while supporting new local emerging markets. Examples may include, but are not limited to:

- Commercial building electrification
- Combined demand response ("DR") / energy efficiency ("EE") installations

Commencement Date

The program will begin three months following CPUC approval and will run for a minimum of three years.

Cost-Effectiveness Analysis

The initial forecasted Total Resource Cost ("TRC") for the Commercial P4P Program is 1.07 with a forecasted Program Administrator Cost ("PAC") of 1.87. The full results of the calculation can be found in Appendix A: TSB and Cost-Effectiveness Calculations. EBCE expects that the TRC will improve in subsequent implementation years, after the program is ramped up.

Demand Reduction, Energy Savings, and Other Measures of Success

EBCE expects that the first-year gross energy savings for the program will be 9,011,867 kWh with demand savings of 1029 kW.

Additional measures of success will include, but not be limited to:

- 60% of projects will include demand control strategies
- 50% of projects will include "high opportunity" projects as identified by EBCE staff (for example, customers in the top 25% of peak demand users)

- 30% of projects will include building electrification measures

Budget

The three-year program budget for the Commercial P4P Program is $13,463,049.

COLLABORATION

EBCE will collaborate and partner with PG&E and BayREN. EBCE will differentiate its locally administered program from PG&E's and BayREN's. EBCE will also provide PG&E and BayREN all necessary information regarding locally funded programs and statewide and regional program referrals. EBCE will partner with PG&E and BayREN to collectively direct customers to the best service, while reducing confusion at every step. Additionally, EBCE is currently tracking the Joint Coordination Memorandum that BayREN and MCE are collaborating on and plan to use a similar approach to avoid duplication and customer confusion.

STATUTORY AUTHORITY

Assembly Bill 117 (2002) and Senate Bill (SB) 790 (2011) contain specific provisions relating to administration of energy efficiency programs by CCAs. AB 117 established the formal application option, allowing CCAs to file an application for administration of energy efficiency programs.

SB 790 modified Section 381.1 to give CCAs another option for energy efficiency program administration, adding subsections (e) and (f) to Section 381.1. These newer subsections allow a CCA to invoke an alternative Commission review process (as opposed to a formal application) for programs funded by and offered exclusively to CCA customers.

D.14-01-033 established the rules governing CCA submission of advice letters to administer energy efficiency programs for their own customers under Sections 381.1(e)-(f). This second option allows a CCA such as EBCE to "elect" to become an administrator for cost-effective energy efficiency and conservation programs, subject to Commission certification of a plan. This is the option which EBCE is pursuing in this advice letter.

RULES AND REQUIREMENTS GOVERNING PLAN CERTIFICATION

Per D.14-01-033, the Commission must first make a funding determination, *i.e.*, establish whether the funding requested in the CCA's proposed plan is within the forecasted maximum amount of funds the CCA would be eligible to collect. Next, the Commission must certify that a CCA plan meets six criteria, specified in paragraphs (1)-(6) of Section 381.1(f). These requirements are addressed on a cursory level below and in detail in the attached Plan.

FUNDING DETERMINATION

Resolution E-4518 states that "funding collection and program periods do not always correspond" and that there is no statutory requirement for funding collection to begin subsequent to Commission certification of the plan. MCE was provided a collection period starting on the original draft submittal date. Based on this precedent, it is reasonable for CPUC

to direct transfer of energy efficiency funds collected from EBCE's ratepayers to EBCE beginning on October 22, 2021, EBCE's advice letter filing date.

The Commission must establish whether the funding requested in the CCA's proposed plan is within the forecasted maximum amount of funds the CCA would be eligible to collect. Commission staff must determine the actual and forecasted amounts of non-bypassable charges likely to be collected from the CCA's customers over a reasonable collection period to fund energy efficiency programs. The Commission is to use the following formula:

> CCA maximum funding = total electricity energy efficiency non-bypassable charge collections from the CCA's customers – (total electricity energy efficiency non-bypassable charge collections from the CCA's customers x % of the applicable IOU portfolio budget that was dedicated to statewide and regional programs in the most recently authorized program cycle)

EBCE staff have determined:

- Total non-bypassable funds to be collected from EBCE customers in 2022 = $133,201,953.98
- 96.63% of collected funds are currently dedicated to statewide and regional programs.
- Total funding to statewide and regional programs from EBCE customers = $128,714,271.14
- EBCE's first year not-to-exceed value = Total non-bypassable funds collected from CCA customers less statewide and regional programs (($133,201,953.98*[1 –% excluded IOU budget (96.63%)]) = $4,487,682.84
- The three year not-to-exceed value equals $13,463,049

To calculate energy efficiency non-bypassable charge collections from EBCE's customers in 2022, EBCE used forecasted electricity sales for 2022. To determine the portion of funding used for statewide and regional programs, EBCE used the program budget from PG&E's 2021 Annual Budget Advice Letter (ABAL), PG&E's most recent approved program budgets. Under this budget, 96.63% of funds are budgeted to go to statewide, regional and uncategorized programs, and 3.37% are budgeted to go to local programs.[5] EBCE's first-year not to exceed

[5] To calculate energy efficiency non-bypassable charge collections from EBCE's customers in 2021, EBCE used fee per kWh data and load data from PG&E, SMUD, and CAISO as well as PG&E's 2021 ABAL program budget. PG&E programs included as local or other programs, consistent with communications with PG&E and CPUC, and therefore eligible to be included in EBCE's funding determination are: PGE2110051 (Local Government Energy Action Resources), PGE_Pub_001 (Central Coast Leaders in Energy Action Program), PGE_Pub_002 (Marin Energy Watch Partnership), PGE_Pub_003 (Redwood Coast Energy Watch), PGE_Pub_004 (Central California Energy Watch), PGE_Pub_005 (San Mateo County Energy Watch Program), PGE_Pub_006 (Energy Access SF), PGE_Pub_007 (Sierra Nevada Energy Watch), and PGE_Pub_008 (Sonoma Public Energy).

value is 3.37% of the total non-bypassable funds collected from EBCE customers for EE programs.

SECTION 381.1(f) REQUIREMENTS

Pursuant to Section 381.1(f), the Commission must certify that this Plan meets six criteria, specified in paragraphs (1)-(6), which provide:

> The commission shall certify that the plan submitted does all of the following:
>
> (1) Is consistent with the goals of the programs established pursuant to this section and Section 399.4.
>
> (2) Advances the public interest in maximizing cost-effective electricity savings and related benefits.
>
> (3) Accommodates the need for broader statewide or regional programs.
>
> (4) Includes audit and reporting requirements consistent with the audit and reporting requirements established by the commission pursuant to this section.
>
> (5) Includes evaluation, measurement, and verification protocols established by the community choice aggregator.
>
> (6) Includes performance metrics regarding the community choice aggregator's achievement of the objectives listed in paragraphs (1) to (5), inclusive, and in any previous plan.

Consistency with CPUC Goals

The attached Plan explains in detail how it is consistent with the goals of the programs established pursuant to Section 381.1 and Section 399.4. EBCE's commercial program will deliver cost-effective energy savings to its customers while remaining consistent with CPUC goals, supporting EBCE's goal for providing 100% clean energy by 2030, and aligning to its statement of intent to implement a CCA program that includes universal access, reliability, and equitable treatment of all customer classes.

EBCE's program is consistent with broader regional or statewide energy efficiency programs and are designed to integrate demand side management activities in a way that will value stack the deployment of distributed energy resources. This will also support relevant rulings and decisions such as, but not limited to, D.07-10-032 and D.12-11-015.

The proposed Plan meets the State's goals to decarbonize California as detailed in the 2021 Integrated Energy Policy Report (IEPR) Final Scoping Order. The California Energy Commission is committed to advancing building decarbonization incentive programs, while assessing existing and future policies and programs in an equitable manner. EBCE's Plan aligns with such goals as we enroll customers into an energy efficiency incentive program that saves customers money and reduces emissions while also offering building electrification measures to advance the state's climate goals. Particularly, the Commercial P4P program will leverage emerging P4P

program approaches to offer cost-effective projects for non-residential customer accounts. Projects will focus on high-potential opportunities for peak management and building electrification.

By acting as point of contact for EBCE customers, EBCE will simplify achieving the goals set forth in Section 381.1. This will ensure that local and statewide goals are met, such as those associated with SB 350.

Cost-Effectiveness and Total System Benefit

EBCE's Commercial P4P Program achieves a TRC of 1.07. EBCE performed cost-effectiveness analysis on the proposed program portfolio in accordance with the methodologies included in the California Standard Practices Manual. As detailed in the attached Plan, EBCE's first-year forecasted program portfolio TRC is 1.07 for the resource program segment and forecasted first-year Program Administrator Cost ("PAC") for the portfolio is 1.57. EBCE forecasts that TRC will improve in subsequent implementation years, after the program is ramped up. The full results of the calculation can be found in Appendix A: Cost-Effectiveness Calculations.

Accommodation of Statewide and Regional Programs

Both PG&E and BayREN are Program Administrators offering ratepayer funded EE programs in EBCE's service area. EBCE will work closely with BayREN and PG&E to verify that customers have not been double-enrolled and to coordinate marketing and outreach efforts where appropriate. At a minimum, this will include requiring customers to verify that they have not received, or do not plan to receive, other utility incentives for their project. For applications received from non-CCA customers, EBCE will provide warm hand-offs to the relevant PG&E or BayREN program.

Auditing and Reporting

EBCE performs annual financial audits using generally accepted accounting principles (GAAP) specific to government entities. These reports are publicly available and will be provided to the CPUC on request. As a Joint Powers Authority CCA, once EBCE's energy efficiency program plan is certified and the program begins, current auditing procedures will be extended to include energy efficiency program administration data. This will ensure appropriate accounting controls for energy efficiency program funds.

Per requirements of the Governmental Accounting Standards Board, discussion and analysis will be included to supplement the basic financial statements. To evaluate the effective use of resources and management procedures, EBCE will also complete all regulatory filings and reports as directed by CPUC staff. These documents will provide the results of program efforts that can be evaluated against the performance metrics identified by EBCE, including adherence to cost-effectiveness requirements.

Evaluation, Measurement, and Verification Protocols

EBCE will contract with an independent third-party to perform process evaluation or market studies to determine the effectiveness and needs for the successful implementation of the program. EBCE-led studies will be performed according to the Commission oversight process of IOU Evaluation Measurement and Verification ("EM&V") projects as detailed in the Energy Efficiency EM&V Plan. EBCE will be subject to the same protocol as IOUs for CPUC-directed impact evaluations to determine actual energy savings, benefits, costs, and goal achievement as directed in D.05-01-055. EBCE expects to dedicate no more than 3% of total program budget during the three-year program to EM&V.

Performance Metrics

The attached Plan contains a section regarding performance metrics, which will indicate progress toward meeting the goals and objectives of the Commission's Energy Efficiency Strategic Plan and EBCE's service goals.

CONCLUSION

The Plan meets all requirements as outlined by relevant statutory authority as well as Commission decisions and resolutions. Therefore, EBCE requests that the Commission certify the Plan via resolution.

ATTACHMENTS

Attachment 1 – Plan and Appendices

- East Bay Community Energy's Energy Efficiency Program Plan (Clean)
- Appendix A: Cost-Effectiveness Calculations (Clean)
- Appendix B: Funding Analysis (Clean)

Attachment 2 – Redline of Plan and Appendices

- East Bay Community Energy's Energy Efficiency Program Plan (Redline)
- Appendix A: Cost-Effectiveness Calculations (Redline)
- Appendix B: Funding Analysis (Redline)

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.3, and Decision (D.) 14-01-033, East Bay Community Energy (EBCE) submits this Advice Letter with a Tier 3 designation.

EFFECTIVE DATE

This advice filing will become effective upon approval by the California Public Utilities Commission (Commission) via the resolution process.

NOTICE

In accordance with GO 96-B, Section IV, a copy of this advice letter is sent electronically to parties shown on service list A.17-01-013 and R.13-11-005.

As required in the Decision, EBCE is serving copies of this advice letter to the relevant parties shown on the A.17-01-013 service list, and also serving copies of this advice letter as a courtesy to the energy efficiency proceeding, R.13-11-005. For changes to these services lists, please contact the Commission's Process Office at (415) 703-2021, or by electronic mail at Process_Office@cpuc.ca.gov.

PROTESTS

EBCE was directed by the Energy Division to maintain the original protest period designated in EBCE AL 28-E pursuant to GO 96-B, General Rule 7.5.1[6], and not reopen the protest period.

CORRESPONDENCE

For questions, please contact Feby Boediarto at (510) 650-7582 or by e-mail at fboediarto@ebce.org.

/s/ Feby Boediarto
Feby Boediarto, Regulatory Analyst
East Bay Community Energy
1999 Harrison Street
Suite 800
Oakland, CA 94610
(510) 650-7582
Email: fboediarto@ebce.org

Copy (via e-mail): Service List – A.17-01-013
Service List – R.13-11-005
Energy Division Tariff Unit (EDTariffUnit@cpuc.ca.gov)
PG&E Tariffs (AdviceTariffManager@pge.com)

[6] "The filing of a supplement, or of additional information at the request of the reviewing Industry Division, does not automatically continue or reopen the protest period or delay the effective date of the advice letter. The reviewing Industry Division, on its own motion or at the request of any person, may issue a notice continuing or reopening the protest period. Any new protest shall be limited to the substance of the supplement or additional information."

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Concerning Energy Efficiency Rolling Portfolios, Policies, Programs, Evaluation, and Related Issues.	Rulemaking 13-11-005 (Filed November 14, 2013)

(NOT CONSOLIDATED)

Application of Southern California Edison Company (U338E) for Approval of Energy Efficiency Rolling Portfolio Business Plan.	Application 17-01-013 (Filed January 17, 2017)

EAST BAY COMMUNITY ENERGY (ID 201) NOTICE OF AVAILABILITY ADVICE LETTER NO. 28-E-A – ELECTION TO ADMINISTER ENERGY EFFICIENCY PROGRAM

Feby Boediarto
Regulatory Analyst
East Bay Community Energy
1999 Harrison Street, Suite 800
Oakland, CA 94612
fboediarto@ebce.org
Telephone: 510-650-7582

Dated: March 10, 2022

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EAST BAY COMMUNITY ENERGY (ID 201)
NOTICE OF AVAILABILITY
ADVICE LETTER NO. 28-E-A – ELECTION TO ADMINISTER ENERGY EFFICIENCY PROGRAM

Pursuant to Rule 1.9 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), East Bay Community Energy ("EBCE") hereby provides this Notice of Availability of its Advice Letter No. 28-E-A.

The Advice Letter includes the following appendices:

- Attachment 1 – Plan and Appendices
    - East Bay Community Energy's Energy Efficiency Program Plan (Clean)
    - Appendix A: Cost-Effectiveness Calculations (Clean)
    - Appendix B: Funding Analysis (Clean)
- Attachment 2 – Redline of Plan and Appendices

- East Bay Community Energy's Energy Efficiency Program Plan (Redline)
- Appendix A: Cost-Effectiveness Calculations (Redline)
- Appendix B: Funding Analysis (Redline)

Due to the size of the Attachments, an electronic/hard copy of is not included. Instead, EBCE is providing notice that the Advice Letter can be viewed at:

www.ebce.org/cpuc-documents

The Advice Letter may be viewed online, printed, searched, and downloaded. As an alternative to accessing the Advice Letter online, EBCE can provide a copy to any party upon request. To request a copy of the Advice Letter, please contact: East Bay Community Energy, 1999 Harrison Street, Suite 800, Oakland, CA 94612, or Feby Boediarto via email at fboediarto@ebce.org or by telephone at 510-650-7582.

Respectfully submitted,

/s/ Feby Boediarto
Feby Boediarto
Regulatory Analyst
East Bay Community Energy
1999 Harrison Street, Suite 800
Oakland, CA 94612
fboediarto@ebce.org
Telephone: 510-650-7582

Dated: March 10, 2022



California Public Utilities Commission

ADVICE LETTER SUMMARY

ENERGY UTILITY

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

Company name/CPUC Utility No.: East Bay Community Energy/ #201

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

Contact Person: Feby Boediarto
Phone #: 510-650-7582
E-mail: fboediarto@ebce.org
E-mail Disposition Notice to: fboediarto@ebce.org

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(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 28-E

Tier Designation: 3

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Keywords (choose from CPUC listing):

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D.14-01-033, D.21-05-031

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Summarize differences between the AL and the prior withdrawn or rejected AL:

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If yes, specification of confidential information:
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Resolution required? ☑ Yes ☐ No

Requested effective date: No. of tariff sheets:

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Estimated system average rate effect (%):

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

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CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Feby Boediarto
Title: Regulatory Analyst
Utility Name: East Bay Community Energy
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City: Oakland
State: California Zip: 94612
Telephone (xxx) xxx-xxxx: (510) 650-7582
Facsimile (xxx) xxx-xxxx:
Email: fboediarto@ebce.org

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

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
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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

October 22, 2021

Advice No. 28-E
(East Bay Community Energy ID 201)

California Public Utilities Commission
Energy Division
Attention: Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102-3298

Subject: **East Bay Community Energy Election to Administer Energy Efficiency Program**

PURPOSE

California Public Utilities Commission Decision ("D.") 14-01-033, *Decision Enabling Community Choice Aggregators to Administer Energy Efficiency Programs* ("the Decision"), established the rules for Community Choice Aggregators ("CCAs") to file advice letters to administer energy efficiency programs for their own customers under California Public Utilities Code Sections 381.1(e)-(f).[1] East Bay Community Energy ("EBCE") submits this Tier 3 Advice Letter to seek Commission certification under Sections 381.1 (e) and (f) to administer two energy efficiency programs, a Commercial Pay-for-Performance ("P4P") Program and a Low- to Moderate-Income ("LMI") Residential Electrification Program, as described in further detail below. All necessary supporting documentation is attached hereto.

BACKGROUND

EBCE 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 EBCE's Implementation Plan on November 8, 2017. EBCE 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 EBCE's Implementation Plan and

[1] All subsequent references to code sections are to the Cal. Pub. Util. Code.

Statement of Intent, adding the cities of Newark and Pleasanton, as well as the city of Tracy in San Joaquin County, to EBCE's service territory beginning in 2021. EBCE is currently one of the largest CCAs in the state.

EBCE serves over 576,000 residential accounts, 57,000 non-residential accounts, and 5,000 municipal accounts in Alameda County and in Tracy, California. EBCE is committed to providing clean energy options for our diverse community.

The CalEnviroScreen 3.0 tool identifies 42 census tracts in EBCE's service area that score within the top 25% of communities with the highest burden. Those 42 census tracts have a population total of 184,822. Additionally, EBCE currently provides service to over 120,000 residential accounts participating in CARE and over 4,000 in FERA, accounting for over 20% of EBCE's accounts.[2]

With this Advice Letter, EBCE desires to become an administrator of funds, collected from EBCE ratepayers through a non-bypassable charge authorized by the Commission for energy efficiency and conservation programs. EBCE puts forth our Energy Efficiency Program Plan ("Plan"), which is attached hereto and discussed in more detail below, to deliver services to non-residential and residential ratepayers pursuant to Public Utilities Code 381.1.

SUMMARY OF PLAN

The Plan includes two programs to benefit EBCE's commercial and residential customers: the Commercial P4P Program and the LMI Residential Electrification Program. In administering these programs, EBCE will be leveraging our experience and existing resources from current pilots of similar program concepts, which should support the timely and efficient launch of the proposed portfolio.

COMMERCIAL P4P PROGRAM

EBCE's program will leverage emerging P4P program approaches to offer cost-effective projects for our non-residential customer accounts. Projects will focus on high-potential opportunities for peak management and building electrification. EBCE will leverage our existing data and analytics capabilities to assist program implementers in identifying the highest opportunity projects and will pay incentives for cost-effective savings as measured at the meter per the CalTRACK methodologies.

Deliverables

The program will provide a marketplace approach, where qualified vendors are allowed to submit projects and receive incentives on a portfolio of projects. There will be a high emphasis on demand management strategies, including permanent baseload reduction as well as controls-based load shifting approaches. Customers will be educated on the potential impacts of time-of-use ("TOU") rates and offered tools and strategies for adapting their business model to new rate structures, as they emerge.

[2] 06/2021 data

Though not necessarily an exhaustive list, EBCE proposes to install the following measure types:

- Refrigeration controls
- Lighting measures
- Building envelope
- Retro-commissioning
- Building electrification measures: Heat pump water heating, space heating, and induction cooking technologies
- Load management strategies (controls, programmable thermostats, smart appliances)

EBCE's program design is flexible, adaptive, and innovative. We will explore and incorporate new offerings over time that will advance and align with state goals while supporting new local emerging markets such as:

- Commercial building electrification
- Combined demand response ("DR") / energy efficiency ("EE") installations

Commencement Date

The program will begin three months following CPUC approval and will run for a minimum of three years.

Cost-Effectiveness Analysis

The initial forecasted Total Resource Cost ("TRC") for the Commercial P4P Program is 1.00 with a forecasted Program Administrator Cost ("PAC") of 1.44. The full results of the calculation can be found in Appendix A: TSB and Cost-Effectiveness Calculations. EBCE expects that the TRC will improve in subsequent implementation years, after the program is ramped up.

Demand Reduction, Energy Savings, and Other Measures of Success

EBCE expects that the first-year gross energy savings for the program will be 4,389,454 kWh with demand savings of 501 kW. EBCE's portfolio-wide first-year Total System Benefit ("TSB") is forecasted to be $3,854,228.

Additional measures of success will include, but not be limited to:

- 60% of projects will include demand control strategies
- 50% of projects will include "high opportunity" projects as identified by EBCE staff (for example, customers in the top 25% of peak demand users)
- 30% of projects will include building electrification measures

Budget

The three-year program budget for the Commercial P4P Program is $6,995,097.

LMI RESIDENTIAL ELECTRIFICATION PROGRAM

EBCE's program will seek to expand the availability of building retrofit measures, with an emphasis on building electrification, for EBCE's low- to middle-income residential customers. With a growing emphasis on the need to transition California's buildings away from natural gas appliances, there is a risk that those customers least able to afford the transition will be left paying high infrastructure costs as the pool of gas ratepayers shrinks and higher-income customers switch to electric appliances first. Focusing resources on the low- and middle-income segment will help support California's just transition to electrification, while also offering important energy savings and indoor air quality benefits to a historically underserved customer segment.

EBCE seeks to implement a no-upfront-cost program for customers that earn up to 120% of area median income. Incentives will be offered to one or more implementers on a pay-for-performance basis, with measure packages seeking to deliver combined energy efficiency, building electrification, and demand management to provide the maximum cost savings to customers. EBCE will also seek to engage implementers who are able to leverage other state and national programs, such as the Solar for Affordable Single-Family Homes ("SASH") program and the Self-Generation Incentive Program ("SGIP").

Deliverables

The program will provide no-upfront-cost installations of packaged energy efficiency and building electrification measures to 200 LMI customers per year. Customers will also be offered education on time-of-use rates to minimize the bill impacts associated with electrification of appliances typically used during peak periods (*e.g.*, water heaters, space conditioning, cooking).

Through not necessarily an exhaustive list, EBCE proposes to install the following measure types:

- Building envelope
- Heat pump technology (space conditioning, water heating)
- Induction cooking
- Programmable thermostats
- LED lighting

EBCE's program design is flexible, adaptive, and innovative and we will explore and incorporate new offerings over time that will advance and align with state goals while supporting new local emerging markets such as:

- Residential building electrification
- Workforce opportunities for new entrants and transitioning fossil fuel employees
- Combined EE / DR deployment

Commencement Date
The program will begin three months following CPUC approval and will run for three years.

Cost-Effectiveness Analysis

As an equity program, the EBCE LMI Residential Electrification Program is not subject to a cost-effectiveness threshold.[3] Cost-effectiveness forecasts for the resource acquisition program segment of EBCE's portfolio are presented in the Commercial P4P Program Cost-Effectiveness Analysis section of this Advice Letter. Portfolio-wide cost-effectiveness forecasts are presented later in this Advice Letter in the Cost-Effectiveness section.

Demand Reduction, Energy Savings, and Other Measures of Success

EBCE expects that first-year gross energy savings for the program will be 998,538 kWh with demand savings of 75 kW. EBCE's portfolio-wide first-year Total System Benefit ("TSB") is forecasted to be $3,854,228.

Additional measures of success will include, but not be limited to:[4]

- 50% of program funds will be deployed to support customers at or below 80% of area median income (AMI);
- 80% of projects will include electrification of an existing appliance;
- 30% of projects will include demand management strategies and bill management education.

Budget

The three-year program budget for the LMI Residential Electrification Program is $2,997,897.

COLLABORATION

EBCE has a strong history of collaborating and partnering with PG&E and BayREN. EBCE will make every effort to differentiate our locally administered programs from PG&E's and BayREN's. EBCE will also provide PG&E and BayREN all necessary information regarding locally funded programs and statewide and regional program referrals. EBCE plans to maintain a partnership with PG&E and BayREN to collectively direct customers to the very best service, while reducing confusion at every step.

STATUTORY AUTHORITY

Assembly Bill 117 (2002) and Senate Bill (SB) 790 (2011) contain specific provisions relating to administration of energy efficiency programs by CCAs. AB 117 established the formal

[3] D.21-05-031, p. 22-23.

[4] EBCE will also incorporate forthcoming guidance and metrics from the California Energy Efficiency Coordinating Committee (CAEECC) Market Sector Metrics and Equity Metrics Working Groups, which are charged with identifying and defining key objectives and metrics for the new Market Support and Equity portfolio segments codified in D.21-05-031.

application option, allowing CCAs to file an application for administration of energy efficiency programs on essentially the same terms as the investor-owned utilities (IOUs).

SB 790 modified Section 381.1 to give CCAs another option for energy efficiency program administration, adding subsections (e) and (f) to Section 381.1. These newer subsections allow a CCA to invoke an alternative Commission review process (as opposed to a formal application) for programs funded by and offered to the CCA's customers.

D.14-01-033 established the rules governing CCA submission of advice letters to administer energy efficiency programs for their own customers under Sections 381.1(e)-(f). This second option allows a CCA such as EBCE to "elect" to become an administrator for cost-effective energy efficiency and conservation programs, subject to Commission certification of a plan. This is the option which EBCE is pursuing through the filing of the instant advice letter.

RULES AND REQUIREMENTS GOVERNING PLAN CERTIFICATION

Per D.14-01-033, the Commission must first make a funding determination, *i.e.*, establish whether the funding requested in the CCA's proposed plan is within the forecasted maximum amount of funds the CCA would be eligible to collect. Next, the Commission must certify that a CCA plan meets six criteria, specified in paragraphs (1)-(6) of Section 381.1(f). These requirements are addressed on a cursory level below and in detail in the attached Plan.

FUNDING DETERMINATION

Resolution E-4518 states that "funding collection and program periods do not always correspond" and that there is no statutory requirement for funding collection to begin subsequent to Commission certification of the plan. Marin Energy Authority (now referred to as MCE) was provided a collection period starting on the original draft submittal date. Based on this precedent, EBCE finds it reasonable to request the CPUC to direct transfer of energy efficiency funds collected from EBCE's ratepayers beginning on October 22, 2021, EBCE's advice letter filing date.

The Commission must establish whether the funding requested in the CCA's proposed plan is within the forecasted maximum amount of funds the CCA would be eligible to collect. Commission staff must determine the actual and forecasted amounts of non-bypassable charges likely to be collected from the CCA's customers over a reasonable collection period to fund energy efficiency programs. The Commission is to use the following formula:

> CCA maximum funding = total electricity energy efficiency non-bypassable charge collections from the CCA's customers – (total electricity energy efficiency non-bypassable charge collections from the CCA's customers x % of the applicable IOU portfolio budget that was dedicated to statewide and regional programs in the most recently authorized program cycle)

EBCE staff have determined:

- Total CCA non-bypassable funds to be collected in 2021 = $98,869,629.91
- 96.63% of collected funds are currently dedicated to statewide and regional programs.

- Total funding to statewide and regional programs = $95,538,631.16
- EBCE's first year not-to-exceed value = Total non-bypassable funds collected by CCA customers less statewide and regional programs (($98,869,629.91*[1 –% excluded IOU budget (96.63%)])= $3,330,998.75
- The three year not-to-exceed value equals $9,992,996.25

To calculate energy efficiency non-bypassable charge collections from EBCE's customers in 2021, EBCE used fee per kWh data and load data from PG&E, SMUD, and CAISO. To determine the portion of funding used for statewide and regional programs, EBCE used the program budget from PG&E's 2021 Annual Budget Advice Letter (ABAL). Under this budget, 96.63% of funds are budgeted to go to statewide, regional and uncategorized programs, and 3.37% are budgeted to go to local programs.[5] EBCE's first-year not to exceed value is 3.37% of the total non-bypassable funds collected from EBCE customers for EE programs in 2021.

SECTION 381.1(f) REQUIREMENTS

Pursuant to Section 381.1(f), the Commission must certify that this Plan meets six criteria, specified in paragraphs (1)-(6), which provide:

> The commission shall certify that the plan submitted does all of the following:
>
> (1) Is consistent with the goals of the programs established pursuant to this section and Section 399.4.
>
> (2) Advances the public interest in maximizing cost-effective electricity savings and related benefits.
>
> (3) Accommodates the need for broader statewide or regional programs.
>
> (4) Includes audit and reporting requirements consistent with the audit and reporting requirements established by the commission pursuant to this section.
>
> (5) Includes evaluation, measurement, and verification protocols established by the community choice aggregator.

[5] To calculate energy efficiency non-bypassable charge collections from EBCE's customers in 2021, EBCE used fee per kWh data and load data from PG&E, SMUD, and CAISO as well as PG&E's 2021 ABAL program budget. PG&E programs included as local or other programs, consistent with communications with PG&E and CPUC, and therefore eligible to be included in EBCE's funding determination are: PGE2110051 (Local Government Energy Action Resources), PGE_Pub_001 (Central Coast Leaders in Energy Action Program), PGE_Pub_002 (Marin Energy Watch Partnership), PGE_Pub_003 (Redwood Coast Energy Watch), PGE_Pub_004 (Central California Energy Watch), PGE_Pub_005 (San Mateo County Energy Watch Program), PGE_Pub_006 (Energy Access SF), PGE_Pub_007 (Sierra Nevada Energy Watch), and PGE_Pub_008 (Sonoma Public Energy).

(6) Includes performance metrics regarding the community choice aggregator's achievement of the objectives listed in paragraphs (1) to (5), inclusive, and in any previous plan.

Consistency with CPUC Goals

The attached Plan explains in detail how it is consistent with the goals of the programs established pursuant to Section 381.1 and Section 399.4. EBCE's commercial and residential programs will deliver cost-effective energy savings to our customers while remaining consistent with CPUC goals, supporting EBCE's goal for providing 100% clean energy by 2030, and aligning to our statement of intent to implement a CCA program that includes universal access, reliability, and equitable treatment of all customer classes.

EBCE's programs are consistent with broader regional or statewide energy efficiency programs and are designed to integrate demand side management activities in a way that will value stack the deployment of distributed energy resources. This will also support relevant rulings and decisions such as, but not limited to, D.07-10-032 and D.12-11-015.

The proposed Plan meets the State's goals to decarbonize California as detailed in the 2021 Integrated Energy Policy Report (IEPR) Final Scoping Order. The California Energy Commission is committed to advancing building decarbonization incentive programs, while assessing existing and future policies and programs in an equitable manner. EBCE's Plan aligns with such goals as we enroll customers into energy efficiency incentive programs that save customers money and reduce emissions while also offering building electrification measures to advance the state's climate goals. Particularly, the LMI Residential Electrification Program is aimed to overcome barriers for low- and moderate-income customers by offering measures that do not require up-front costs from participants. The purpose of this program is to expedite the participation of EBCE's lower income communities, resulting in a more just transition to electrification.

By acting as point of contact for EBCE customers, EBCE will simplify the goals set forth in Section 381.1. This will ensure that local and statewide goals are met, such as those associated with SB 350.

EBCE's Plan is consistent with recent guidance from CPUC in D.21-05-031 that directs all Program Administrators ("PAs") to segment their portfolios based on primary program purpose into three categories: resource acquisition, equity, and market support.[6] EBCE's Plan includes programs segmented into resource acquisition (Commercial P4P Program) and equity (LMI Residential Electrification Program) categories. D.21-05-031 also directs PAs to report on a new Total System Benefit ("TSB") metric,[7] which EBCE has estimated for our portfolio and included in our Plan.

D.14-01-033 establishes the cost-effectiveness criteria for CCA administration noting that, "CCA program administrators will be subject to the same cost-effectiveness standards as IOU

[6] D.21-05-031 Assessment of Energy Efficiency Potential and Goals and Modification of Portfolio Approval and Oversight Process, Ordering Paragraph (OP) 2 at 81.

[7] Ibid, OP 1 at 80.

program administrators."[8] Therefore, EBCE's proposed Plan complies with the most recent Decision to advance EE portfolio design and implementation that is both feasible and meaningful to our customers.

Cost-Effectiveness and Total System Benefit

With D.21-05-031, the Commission modified the approach to cost-effectiveness for all PAs. The Commission introduced a market segmentation approach, asking all PAs to file budget Advice Letters with portfolios segmented into resource acquisition programs and non-resource acquisition programs including market support and equity portions of their portfolios. The Commission in D.21-05-031 directed that the resource acquisition programs of all PAs (excluding Regional Energy Networks) will be subject to the cost-effectiveness threshold Total Resource Cost (TRC) ratio of 1.0.

To comply with this most recent guidance, EBCE has prepared a portfolio that includes a resource acquisition program (Commercial P4P Program) that achieves a TRC of 1.0 and has dedicated 30% of our funding to a residential equity program (LMI Residential Electrification Program). EBCE performed cost-effectiveness analysis on the proposed program portfolio in accordance with the methodologies included in the California Standard Practices Manual. As detailed in the attached Plan, EBCE's first-year forecasted program portfolio TRC is 0.88 (with a first-year TRC of 1.00 for the resource program segment) and forecasted first-year Program Administrator Cost ("PAC") for the portfolio is 1.17. EBCE forecasts that TRC will improve in subsequent implementation years, after the program is ramped up. The full results of the calculation can be found in Appendix A: TSB and Cost-Effectiveness Calculations.

In D.21-05-031, the Commission also introduced a new metric which will be used to evaluate the program portfolio as a whole, the Total System Benefit ("TSB").

The first-year TSB for EBCE's portfolio is forecasted to be $3,854,228.

Accommodation of Statewide and Regional Programs

Both PG&E and BayREN are Program Administrators offering ratepayer funded EE programs in EBCE's service area. To ensure that funds and measures are accurately portrayed, EBCE staff will work closely with relevant BayREN and PG&E staff to establish regular systems for verification that customers have not been double-enrolled and to coordinate marketing and outreach efforts where appropriate. At a minimum, this will include requiring customers to verify that they have not received, or do not plan to receive, other utility incentives for their project. For applications received from non-CCA customers, EBCE will provide warm hand-offs to the relevant PG&E or BayREN program.

[8] D. 14-01-033 Decision Enabling Community Choice Aggregators to Administer Energy Efficiency Programs, issued January 23, 2014, at 41.

Auditing and Reporting

EBCE performs annual financial audits using generally accepted accounting principles (GAAP) specific to government entities. These reports are publicly available and will be provided to the CPUC on request. As a Joint Powers Authority CCA, once EBCE's energy efficiency program plan is certified and the programs begin, current auditing procedures will be extended to include energy efficiency program administration data. This will ensure appropriate accounting controls for energy efficiency program funds.

Per requirements of the Governmental Accounting Standards Board, the management's discussion and analysis will be included to supplement the basic financial statements. To evaluate the effective use of resources and management procedures, EBCE will also complete all regulatory filings and reports as directed by CPUC staff. These documents will provide the results of program efforts that can be evaluated against the performance metrics identified by EBCE, including adherence to cost-effectiveness requirements.

Evaluation, Measurement, and Verification Protocols

EBCE will contract with an independent third-party to perform process evaluation or market studies to determine the effectiveness and needs for the successful implementation of the programs. EBCE-led studies will be performed according to the Commission oversight process of IOU Evaluation Measurement and Verification ("EM&V") projects as detailed in the Energy Efficiency EM&V Plan. EBCE will be subject to the same protocol as IOUs for CPUC-directed impact evaluations to determine actual energy savings, benefits, costs, and goal achievement as directed in D.05-01-055. EBCE expects to dedicate no more than 3% of total program budget during the three-year program to evaluate the programs and markets.

Performance Metrics

The attached Plan contains a section regarding performance metrics, which will indicate progress toward meeting the goals and objectives of the Commission's Energy Efficiency Strategic Plan and EBCE's service goals.

REQUEST

The EBCE Energy Efficiency Program Plan comports with all requirements as outlined by relevant statutory authority as well as Commission decisions and resolutions. Therefore, EBCE requests that the Commission certify the Plan via resolution.

ATTACHMENTS

1. East Bay Community Energy's Energy Efficiency Program Plan
2. Appendix A: TSB and Cost-Effectiveness Calculations
3. Appendix B: Funding Analysis

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.3, and Decision (D.) 14-01-033, East Bay Community Energy (EBCE) submits this Advice Letter with a Tier 3 designation.

EFFECTIVE DATE

This advice filing will become effective upon approval by the California Public Utilities Commission (Commission) via the resolution process.

NOTICE

In accordance with GO 96-B, Section IV, a copy of this advice letter is sent electronically to parties shown on service list A.17-01-013 and R.13-11-005.

As required in the Decision, EBCE is serving copies of this advice letter to the relevant parties shown on the A.17-01-013 service list, and also serving copies of this advice letter as a courtesy to the energy efficiency proceeding, R.13-11-005. For changes to these services lists, please contact the Commission's Process Office at (415) 703-2021, or by electronic mail at Process_Office@cpuc.ca.gov.

PROTESTS

Anyone wishing to protest this advice filing may do so by letter via U.S. mail, facsimile, or electronically, any of which must be received no later than twenty days after the date of this advice filing. Protests or responses to the advice letter must be filed with the Commission's Energy Division and served on the same day. Protests should be mailed to:

Energy Division
Attention: Tariff Unit
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Copies should be mailed to the attention of the Director, Energy Division, Room 4004 (same address above). In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted electronically to the attention of:

Feby Boediarto, Regulatory Analyst
East Bay Community Energy
1999 Harrison Street
Suite 800
(510) 650-7582

Email: Fboediarto@ebce.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 Feby Boediarto at (510) 650-7582 or by e-mail at fboediarto@ebce.org.

/s/ Feby Boediarto
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Copy (via e-mail): Service List – A.17-01-013
Service List – R.13-11-005
Energy Division Tariff Unit (EDTariffUnit@cpuc.ca.gov)
PG&E Tariffs (AdviceTariffManager@pge.com)

East Bay Community Energy's

Energy Efficiency Program Plan

Introduction

East Bay Community Energy ("EBCE") is a Joint Powers Authority formed on December 1, 2016, pursuant to California Government Code §§ 6500 *et. seq*. and started serving residential, commercial, and municipal customers in 2018. EBCE serves Alameda County and each of the following cities incorporated therein: Albany, Berkeley, Dublin, Emeryville, Fremont, Hayward, Livermore, Newark, Oakland, Piedmont, Pleasanton, San Leandro, and Union City, as well as the city of Tracy in San Joaquin County. EBCE started service for Newark, Pleasanton, and Tracy residents, businesses, and government entities in 2021. EBCE's Board of Directors ("Board") is made up of 16 Directors, including one Community Advisory Committee member (non-voting). The Board serves a primary role to direct and advise EBCE staff to achieve EBCE's organizational goals. Because the Board consists of elected officials, EBCE is accountable to our constituents, and can recognize and respond to local energy needs rapidly. EBCE is currently one of the largest Community Choice energy providers in the state. EBCE serves a little over 576,000 residential accounts, 57,000 non-residential accounts, and 5,000 municipal accounts. EBCE is committed to designing and implementing energy efficiency programs for our customers, including our low-income communities, with a focus on energy savings, reducing greenhouse gas ("GHG") emissions, resource and energy conservation, and greater bill stability.

As the County of Alameda and the City of Tracy's locally operated, community choice electric power provider, we are committed to decarbonizing our electric supply as well as keeping rates affordable. EBCE's 2018 Local Development Business Plan ("LDBP") is a founding framework for EBCE staff and Board aimed to accelerate clean energy initiatives and efforts. The LDBP outlines a series of recommendations to advance local investments, including a strategy to develop energy efficiency programs. EBCE's Energy Efficiency ("EE") portfolio is designed to form synergy with the CPUC's EE portfolio rules, while coordinating with community-based organizations and leveraging customer data to ensure targeted and effective marketing and tracking of program impacts. EBCE is committed to EE as an organizational priority, targeting and reducing EBCE's most expensive loads so we can deliver enhanced customer experiences while maintaining low and stable retail rates.[9]

EBCE's approach to resource acquisition EE revolves around identifying the highest cost and dirtiest loads and targeting reduction of that load through a combination of efficiency and peak load reduction strategies. By leveraging emerging population-level pay-for-performance program models, EBCE can facilitate value stacking among permanent baseload reduction and load modifying activities, enhancing the value proposition to both the customer and EBCE. For EBCE's non-resource acquisition portfolio, EBCE seeks to scale up the adoption of combined energy efficiency and electrification projects among the low- to moderate-income ("LMI") populations in EBCE's service area, and additionally seeks to include demand reduction measures to minimize potential peak load impacts associated with residential electrification. EBCE's equity program is designed to improve resiliency, home performance, and quality of life for EBCE's low- and moderate-income customers.

[9] EBCE Local Development Business Plan (LDBP) at p. 19.

Through the administration of the EE programs, EBCE seeks to achieve the following outcomes:

Portfolio-Wide

- Energy savings
- Customer utility bill savings
- Avoided GHG
- Increased customer awareness of energy and GHG reduction opportunities
- Peak load reduction benefits
- Integration with EBCE and other distributed energy resource offerings (including solar, storage, and electric vehicle programs)

LMI Residential Electrification Program (Equity, Non-Resource Acquisition)

- Energy and greenhouse gas savings in LMI households
- Greater bill stability for low- to moderate-income customers (up to 120% AMI)
- Increased in-home comfort
- Increased resilience to climate change induced temperature volatility

EBCE is electing to become an administrator of ratepayer funds by the California Public Utilities Commission ("CPUC") for cost-effective energy efficiency and conservation programs. EBCE submits this program plan to the CPUC for certification under California Public Utilities Code 381.1 (e) and (f) to administer two programs: a Commercial Pay-for-Performance program and an equity based Low- to Moderate-Income (LMI) Residential Electrification program.

EBCE has deep connections to the communities it serves and is fully qualified to provide energy efficiency services to our customers. EBCE puts forth this energy efficiency program plan pursuant to Public Utilities Code 381.1:

> (e) The impartial process established by the commission shall allow a registered community choice aggregator to elect to become the administrator of funds collected from the aggregator's electric service customers and collected through a non-bypassable charge authorized by the commission, for cost-effective energy efficiency and conservation programs, except those funds collected for broader statewide and regional programs authorized by the commission.
>
> (f) A community choice aggregator electing to become an administrator shall submit a plan, approved by its governing board, to the commission for the administration of cost-effective energy efficiency and conservation programs for the aggregator's electric service customers that includes funding requirements, a program description, a cost-effectiveness analysis, and the duration of the program. The commission shall certify that the plan submitted does all of the following:
>
> (1) Is consistent with the goals of the programs established pursuant to this section and Section 399.4.

(2) Advances the public interest in maximizing cost-effective electricity savings and related benefits.

(3) Accommodates the need for broader statewide or regional programs.

(4) Includes audit and reporting requirements consistent with the audit and reporting requirements established by the commission pursuant to this section.

(5) Includes evaluation, measurement, and verification protocols established by the community choice aggregator.

(6) Includes performance metrics regarding the community choice aggregator's achievement of the objectives listed in paragraphs (1) to (5), inclusive, and in any previous plan.

Commercial P4P Program

A. Overview

EBCE's Commercial Pay-for-Performance ("P4P") Program is designed to provide combined energy efficiency and load management services to EBCE's non-residential customers. The program seeks to maximize cost effective energy savings measures, particularly those that reduce consumption during peak periods. Through offering a meter-based approach, the program more easily allows for value stacking between traditional EE measures and emerging load management approaches and sends the price signal to customers that load reduction is valued from 4-9 pm.

The Commercial P4P Program has three primary objectives:

1. Deliver cost-effective energy savings to non-residential customers;
2. Cross-promote demand response and energy efficiency to maximize peak load reductions for energy efficiency projects; and,
3. Encourage electrification of existing natural gas end uses to achieve greenhouse gas reductions.

This market sector represents EBCE's best opportunity for cost effective energy efficiency measures. To maximize the benefits to EBCE's customers and ratepayers, the program is designed to pay incentives only where the benefits of a project exceed the costs on a system basis. To ensure that the program serves customers who are a good fit, EBCE will leverage our internal data analytics and tracking systems to market the program to best suited customers. Sample parameters that customers may be targeted on include but are not limited to:

- High contributors to peak energy use
- High energy consumption relative to industry peers
- Commercial or industrial business type that have participated in EE programs in the past

This program will leverage emerging pay-for-performance incentive models, relying on a third-party implementer to track the energy savings impacts of this program via an experimental design approach. Aggregators will be invited to submit portfolios of projects to EBCE and will be paid incentives on the entire portfolio.

Table 1: Metrics At-a-Glance – Commercial P4P Program

Year	Gross kWh Savings	Net kWh Savings	Percentage	
1	4,389,454	4,169,981	33.33%	of 3-year Goal
2	4,389,454	4,169,981	33.33%	
3	4,389,454	4,169,981	33.33%	
Total	**13,168,362**	**12,509,944**	**100%**	

Table 2: Budgets At-a-Glance – Commercial P4P Program

Cost Category / Program Function	Year 1	Year 2	Year 3	Total
Administration	$233,170	$233,170	$233,170	**$699,510**
Marketing, Education and Outreach	$139,902	$139,902	$139,902	**$419,706**
Direct Implementation Non-Incentive	$466,340	$466,340	$466,340	**$1,399,020**
Direct Implementation Incentive	$1,399,019	$1,399,019	$1,399,019	**$4,197,057**
EM&V	$93,268	$93,268	$93,268	**$279,804**
Program Budget	**$2,331,699**	**$2,331,699**	**$2,331,699**	**$6,995,097**

B. Market Sector Targeted

In 2020, EBCE's commercial customers consumed 2,854 GWh of electricity, accounting for 48.4% of the entire load. This sector is made up of about 53,400 accounts, encompassing 9.5% of all accounts. The commercial load experiences its highest collective use outside of peak hours but still contributes notably during this period.

Commercial customers are responsible for a large percentage of EBCE's total electric load, and the time of day that customers use that energy contributes to the price they pay, the burden on the grid, and the associated GHG emissions. Customers with high peak usage will be key targets for EBCE's Commercial P4P program due to the cost-effective nature of use reduction and price signals from TOU rates.

This program will also target business owners in sectors with high therm usage most likely attributed to air and water heating as great candidates for gas to electric conversions that would improve efficiency and reduce GHG emissions. These sectors include education, finance/insurance, public administration, and restaurant/food. Gas usage data is only available for about 56% of this subset of the population. Nonetheless, disaggregated therm usage suggests that about 26% percent of total therms are used for space heating for customers in these four sectors. Similarly, a look at the disaggregated electric load of these four sectors shows that about 13% of total electrical load is used for AC. These two pieces suggest that this customer segment may be able to achieve cost-effective energy savings through pre-heating/cooling strategies in addition to fuel substitution.

In 2019, EBCE served over 3,700 retail business meters. Retail business customers are characterized by an afternoon peak with a declining but notable contribution to peak hours. Due to the high prevalence of cooling load among this customer segment there is a general increase in electricity usage in summer months in addition to a higher peak. Retail usage peaks at 11 kW during summer, 9.1 kW during the winter, and 9.3 kW during shoulder months. The majority (57.2%) of electricity consumption among retail customers is tied to baseload. This customer segment has a high cooling load of 11.6% and will be targeted for pre-cool strategies to shift the elevated summer load into midday hours when solar is more productive and energy is cheaper. The program will also offer retail customers building envelope measures as they are likely to see meaningful energy savings through these measures. Depending on the size of the

operation, retail customers may be good targets for fuel substitution incentives. Smaller retail establishments present with simpler HVAC and water heating needs and are among the best targets for electrification compared to large retail with industrial sized systems.

EBCE customers in the restaurant and food service industry provide tremendous opportunity for energy efficiency upgrades, particularly in the space of kitchen electrification. In 2019, EBCE served over 3,200 meters in this category. The general load shape of this customer group includes an upward ramp in morning hours followed by two similar peaks around lunchtime and dinner. This load shape is seen consistently across seasons with a general increase in load during summer months. The greatest opportunity to reduce and shift load out of peak periods for this customer group would be in non-cooking energy use cases such as space and water heating and cooling that could implement pre-heat/cool strategies.

For each targeted commercial sector, EBCE will rely on utility billing analytics to identify the peak energy consumers and peak demand contributors among EBCE's commercial customer base. Through targeted marketing to this subset of customers, EBCE anticipates having higher savings per customer, resulting in an overall higher Total Resource Cost ("TRC") for the program.

Table 3: Customer Count and Annual Usage by Type – Commercial P4P Program

Industry	# Meters as of 2019	Avg. Annual KWh	Avg. Annual Therms
Construction	2,881	37,695	3,353
Education	1,118	109,285	6,160
Entertainment	748	78,804	3,541
Finance/Insurance	684	40,306	6,647
Health Care/Social	2,385	76,607	4,065
Public Administration	3,010	52,981	7,614
Real Estate	4,080	66,395	4,048
Restaurant/Food	3,224	74,454	5,948
Retail	3,756	67,685	1,987
Scientific/Technical	1,382	80,235	2,189
Transportation/ Warehousing	860	120,140	2,898
Utilities	170	183,308	17,403
Waste Management	716	76,011	4,909
Total	**25,014**	**1,063,906**	**70,762**

C. Deliverables

EBCE's Commercial P4P Program will create a marketplace for energy efficiency aggregators to deliver cost-effective, high performing, installed measures that lower baseload consumption for

commercial customers. EBCE is working with aggregators to reward energy efficiency investments that emphasize peak load reduction with financial incentives.

There will be a high emphasis on demand management strategies, including permanent baseload reduction as well as controls-based load shifting approaches. Customers will be educated on the potential impacts of time-of-use (TOU) rates and offered tools and strategies for adapting their business model to these new rate structures.

Through not necessarily an exhaustive list, EBCE proposes to install the following measure types:

- Refrigeration controls
- Lighting measures
- Building envelope
- Retro-commissioning
- Building electrification measures: Heat pump water heating, space heating, and induction cooking technology
- Load management strategies (controls, programmable thermostats, smart appliances)

EBCE will pay only for measured and delivered electric energy efficiency that is valued at a TRC ratio of 1.0 or above. The program allows for custom measures, however, the measures that may be most likely to exceed the cost-effectiveness threshold are lighting and refrigeration measures. New gas appliances are excluded.

EBCE's program design is flexible, adaptive, and innovative and we will explore and incorporate new offerings over time that will advance and be consistent with state goals while aligning to and supporting new local emerging markets such as:

- Commercial building electrification
- Combined demand response ("DR") / EE installations

D. Program Innovation

The Commercial P4P Program enables innovative business models and technology in the broader market through incentives that pay for the maximum cost-effective value to the grid and climate, without the barriers and complexity of traditional energy efficiency programs. Companies are free to develop their unique business models and technologies, without complex program rules and deemed outcomes.

EBCE will pay only for measured and delivered energy efficiency that is valued at a TRC ratio of 1.0 or above. Therefore, incentives will not be paid out until a TRC of 1.0 is reached. Rather than running complicated solicitations, picking winners, and taking the performance and business risk, the Commercial P4P Program allows EBCE to engage the broad market of

solutions for our customers and focus on sending a price signal that appropriately values savings to the grid.

In addition, the meter-based approach to this program allows EBCE to value delivered energy reductions regardless of source, opening the door for greater incorporation of demand management strategies deployed along with energy efficiency investments. By encouraging peak load reduction, EBCE hopes to unlock greater load shifting potential and maximize energy reductions when they are the most valuable for avoided GHG emissions.

E. Program Process

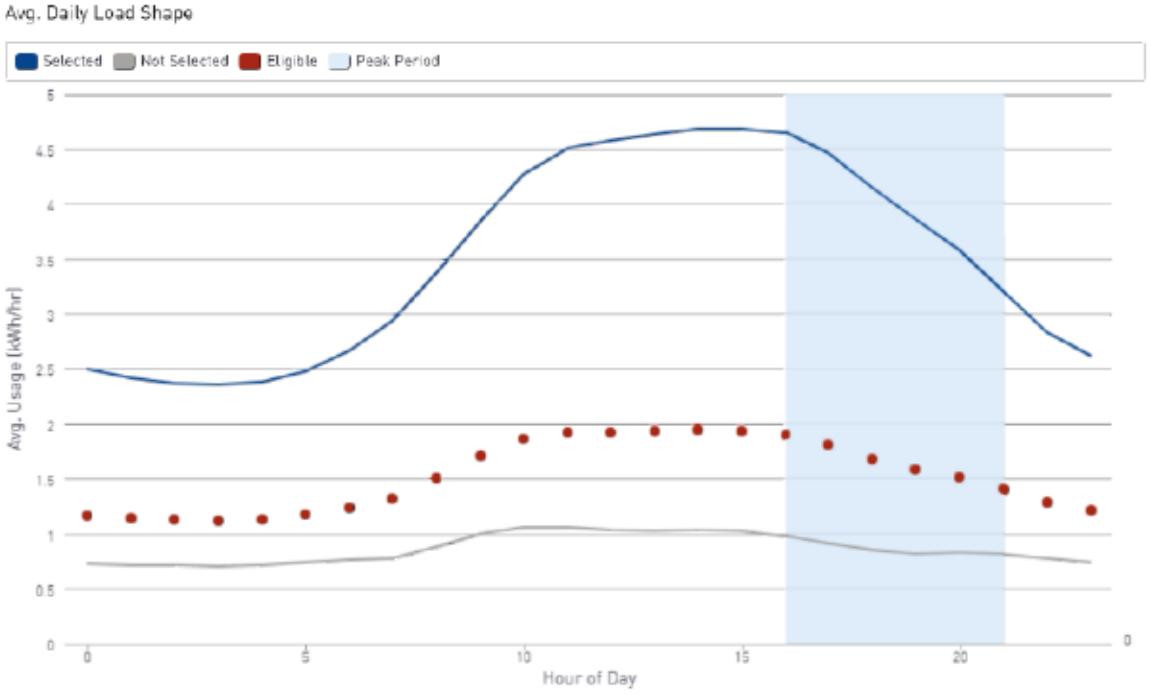
The following tasks outline expected program processes.

Task 1: Customer Acquisition

EBCE intends to leverage our best-in-class data and analytics capabilities to facilitate targeted program marketing. For example, by filtering customers on characteristics such as high peak load contributors, EBCE can ensure that the program is delivered to customers who will benefit the most from participating. This in turn increases the chances that marketing activities will focus on the customers who can most benefit from the program, improving the cost-effectiveness of marketing expenditures.

Figure 1 below demonstrates the average daily load shape of the top 25% of commercial accounts that contribute to peak usage during summer months (blue line; target population) relative to the customers who have been filtered out (gray line). The red dotted line shows the average daily load shape for all commercial customers. Marketing targeted to top peak contributors will be more effective than targeting the general population.

Figure 1: Average Daily Load Shape for Top 25% of Commercial Accounts



Task 2: Interventions

EBCE's Commercial P4P Program will work with energy efficiency aggregators to deliver cost-effective, high performing, installed measures that lower baseload consumption. While aggregators will be free to enroll any project that meets the minimum criteria, EBCE expects most savings for this program to come through refrigeration and lighting measures with improvements to HVAC systems (via retrocommissioning, building envelope, and / or controls) making up most remaining savings. EBCE is also targeting building electrification opportunities but expects these to be a relatively minor portion of the portfolio in the first few years, with saturation increasing over time.

Task 3: Measurement

Once a project has been performed on a property, the actual meter-based consumption post-intervention will be compared against the expected baseline in a "no-intervention" scenario, and the difference will be attributed to the project and will become the basis of incentive payments. Individual project impacts will be calculated by comparing the treatment group (*i.e.*, participating customers) to the control group (i.*e.*, non-participating customers), using 14 months of pre- and post-project data to minimize the noise from non-routine events. In the event that there are lingering impacts associated with the novel coronavirus pandemic, modifications may be made to the control and treatment group selection and measurement as developed in the CalTRACK methodology.[10]

Task 4: Incentive Processing and Reporting

When a project is successfully submitted to the program and passes final QA / QC verification checks, the meter will be assigned to a control group for the purposes of tracking incentive payments. Incentives will be paid on the project following final verification of program impacts, no less than 14 months following project completion. Aggregators will be providing monthly submissions of project enrollments, including anticipated energy savings impacts of the project, and this information will be captured for the purposes of program reporting, incentive reservations, and final incentive payment verification. Once the measurement and verification of savings has been completed, EBCE will issue incentives on portfolios of projects for aggregators. While initial incentives aren't expected to be processed for a full 17 months following approval of the program, eventually EBCE envisions this settlement occurring on a quarterly basis.

F. Commencement Date & Activities

The program is anticipated to launch within three months of CPUC approval and will run for a minimum of three years. EBCE is leveraging our experience and existing resources from current pilots of similar program concepts, which should support the timely and efficient launch of the proposed program. Given the necessary lag in quantifying program impacts from P4P programs, the initial savings results will not be available until a minimum of 14 months following program rollout, and the final savings figures and incentive spend from the initial three-year

[10] https://grid.recurve.com/

implementation will not be available until 14 months after the final project is completed. Below is a high-level schedule of tasks for the initial program launch. Once the program is enrolling customers, tasks 1-4 will be continuously operational. Time brackets identified around tasks 3 and 4 represent estimated time for a single project (i.e., measurement begins with project interventions but continues a full 14 months following project completion).

Task 0: Administrative (0-3 months)

Task 1: Customer Acquisition (starting at 3 months)

Task 2: Interventions (starting at 5 months)

Task 3: Measurement (5-19 months)

Task 4: Incentive Processing and Reporting (19 months)

G. Cost-Effectiveness Analysis

EBCE has performed a cost-effectiveness analysis for the program. Staff have taken steps to ensure the effort was advanced in accordance with the methodologies included in the California Standard Practices manual. Labor and material costs were estimated based on EBCE internal data and recently approved Advice Letters for similar programs.

The first-year Total Resource Cost for the Commercial P4P Program is 1.00 with a Program Administrator Cost of 1.44. The full results of the calculation can be found in Appendix A: TSB and Cost-Effectiveness Calculations. EBCE forecasts that Total Resource Cost will improve in subsequent implementation years, after the program is ramped up.

EBCE's Commercial P4P Program will have energy efficiency aggregators deliver cost-effective, high performing, installed measures that lower baseload consumption. The program is a meter-based pay for performance program for electric savings for EBCE customers. EBCE will pay only for measured and delivered energy efficiency that is valued at a TRC ratio of 1.0 or above. Therefore, incentives will not be paid out until a TRC of 1.0 is reached.

An ECBE-approved third party vendor will calculate energy savings by leveraging the CalTRACK methodology, or other mutually agreed upon approach, for meter-based energy savings. EBCE and our third-party vendor will track program participants using the approved methodology.

H. Demand Reduction, Energy Savings, and Other Measures of Success

EBCE expects that first-year gross energy savings for the program will be 4,389,454 kWh with demand savings of 501 kW. EBCE's portfolio-wide first-year TSB is forecasted at $3,854,288.

Additional measures of success will include, but not be limited to:

- 60% of projects will include demand control strategies
- 50% of projects will include "high opportunity" projects as identified by EBCE staff (for example, customers in the top 25% of peak demand users)
- 30% of projects will include building electrification measures

I. Budget

The three-year budget for the EBCE Commercial P4P Program is $6,995,097. The budget breakdown is shown below.

Table 4: EBCE Three-Year Program Budget - Commercial P4P Program

Program Function	Budget Amount
Administration	$699,510
Marketing, Education and Outreach	$419,706
Direct Implementation Non-Incentive	$1,399,020
Direct Implementation Incentive	$4,197,057
EM&V	$279,804
Three-Year Program Budget	**$6,995,097**

J. Collaboration with Existing Programs

EBCE has a long history of collaborating and partnering with PG&E. EBCE will make every effort to differentiate our locally administered program from PG&E's. In addition, EBCE will continue to work to bring regional and statewide programs to our constituents.

EBCE will provide program delivery information to PG&E through the assigned PG&E representative. EBCE will also provide PG&E all necessary information regarding locally funded programs and statewide and regional program referrals. EBCE plans to maintain a strong partnership with PG&E to collectively direct customers to the very best service, while reducing confusion at every step.

EBCE's Commercial P4P program has the potential to overlap with programs offered by both BayREN and the PG&E Commercial Program. To ensure that customers are not double-counted, EBCE will work closely with both BayREN and PG&E to define target markets and to develop systems on the back end to coordinate treatment and control groups and to check for dual enrollment. EBCE will also ask customers for forms verifying that they have not been enrolled in more than one program for the same measure.

LMI Residential Electrification Program

A. Overview

The low- to moderate-income ("LMI") electrification program is designed to support a just transition to a decarbonized economy by providing energy efficiency and building electrification incentives for single-family residential customers up to 120% of area median income ("AMI").

Background

Low-income customers are some of California's most impacted by environmental pollution and rising utility costs. Historically, lower income communities have been forced to live near pollution sources such as highways or power plants; similarly, they have had the least capacity to improve the conditions on their homes due to either rental status and/or lack of access to capital. The transition to a decarbonized economy offers many potential benefits for these customers, including improved indoor air quality and long-term bill stability; however, existing programs do little to meet customers where they are, requiring expensive initial investments.

The LMI Residential Electrification Program has three primary objectives:

1. Accomplish energy savings and bill reductions for low- to moderate-income customers in EBCE's service area;
2. Promote electrification of natural gas end uses to reduce greenhouse gas emissions; and,
3. Provide time-of-use education to customers to facilitate bill management.

Program Design

EBCE's LMI Residential Electrification Program is designed to offer customers packages of energy efficiency and building electrification measures with no upfront cost. Combining EE measures, such as appliance upgrades and building envelope sealing, along with building electrification such as heat pump water heaters and space conditioning and/or induction ranges, will help offset any potential cost increases associated with building electrification. EBCE will offer incentives of up to 80% of initial measure cost and will be seeking implementers who can provide financing solutions to customers, either via separate financing programs or via an energy services company ("ESCO") delivery model. Incentives will be calculated using a population level pay-for-performance approach. Through offering a no-upfront-cost option with the potential for leasing of equipment, EBCE hopes to unlock the split-incentive barrier that exists in renter-occupied housing (for example, where the building owner owns energy-using equipment but the occupant pays utility expenses, creating a situation where the building owner has no financial incentive to invest in more efficient equipment).

To ensure the greatest financial stability for customers, this program will feature education on time-of-use rates as well as demand management strategies. Customers will be provided with information on the potential impact that electrification of certain appliances can have on their bills given the transition to time-of-use rates. Appliances installed through the program will be "smart," grid-integrated appliances and customers will be walked through how to set and

modify schedules on smart thermostats. EBCE will also refer customers to other distributed energy resources programs, including solar and/or storage incentive programs, and will work with the program implementer to incorporate these offerings into the program.

Table 5: Metrics At-a-Glance - LMI Residential Electrification Program

Year	Gross kWh Savings	Net kWh Savings	Percentage	
1	998,538	748,822	33.33%	of 3-year Goal
2	998,538	748,822	33.33%	
3	998,538	748,822	33.33%	
Total	**2,995,613**	**2,246,465**	**100%**	

Table 6: Budgets At-a-Glance - LMI Residential Electrification Program

Cost Category / Program Function	Year 1	Year 2	Year 3	Total
Administration	$99,930	$99,930	$99,930	**$299,790**
Marketing, Education and Outreach	$59,958	$59,958	$59,958	**$179,874**
Direct Implementation Non-Incentive	$199,860	$199,860	$199,860	**$599,580**
Direct Implementation Incentive	$599,579	$599,579	$599,579	**$1,798,737**
EM&V	$39,972	$39,972	$39,972	**$119,916**
Program Budget	**$999,299**	**$999,299**	**$999,299**	**$2,997,897**

B. Market Sector Targeted

EBCE's service area is home to a widely diverse population of residents and businesses that have served as a backbone since our establishment in 2018. EBCE serves about 576,000 residential customers, with a total annual usage of 2,208,171,233 kWh.[11] Within the residential sector, an estimated 32.5% of Alameda County residents are foreign-born and more than 45% of households report speaking a language other than English at home.[12] The 3 most common non-English languages spoken in the County are Spanish (16.5%), Chinese (9%) (including Mandarin, Cantonese), and Tagalog (3.7%) (including Filipino).[13] Additionally, as of Spring 2021, EBCE now serves the City of Tracy as part of our service area. The City of Tracy alone is home to a diverse population with close to 40% of residents identifying as Hispanic or Latinx.[14] It is

[11] Count of customer accounts from 2020 EBCE customer data. Income information derived from the US Census, American Community Survey data: https://data.census.gov/cedsci/table?q=DP03&g=0500000US06001,06077&tid=ACSDP1Y2019.DP03&hidePreview=true.

[12] Census QuickFacts, Alameda County, United States Census Bureau

[13] 2019 Alameda County, Data USA

[14] 2019 U.S. Census Bureau Data

estimated that 26.9% of Tracy's population is foreign-born with more than 40% of the households reporting speaking a language other than English at home.[15]

Analysis of Alameda County tax assessor records provides a nuanced look at the building stock within EBCE's service area. Most service territory properties in these records are coded as residential (91%) with more than half being single family residences ("SFR") (62.5%). Also of note, more than a third of the buildings in EBCE's service area are multi-family properties. Notably, 53.5% of residents own the home they live in; meaning conversely that 46.5% of the population are renters.

Figure 2: Demographics of EBCE's Residential Customers



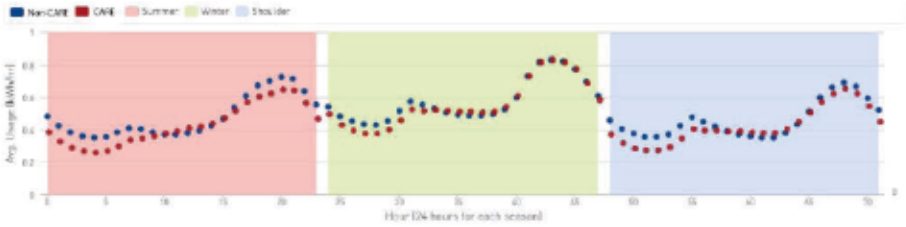
EBCE's LMI Residential Electrification program seeks to target low- to moderate-income residential customers. The goal of this program is to provide a no-upfront-cost pathway to improve the energy efficiency of residents' homes, support the accelerated transition to electrified buildings, and manage potential impacts to peak electricity use. EBCE currently provides service to over 120,000 residential customers participating in CARE and over 4,000 in FERA.[16] CARE customers collectively use less energy during peak hours in summer months and show a lower early morning spike compared to non-CARE. Interestingly, when non-CARE customers experience a downward ramp in midday hours, CARE customers show more consistently flat usage. This indicates that CARE customers have a less flexible load than their non-CARE counterparts, either due to systemic inequities resulting in incomprehensive education around the implications of peak energy usage, and/or due to an inability to respond to price signals to reduce usage. Additionally, lower summer peak usage may suggest active cost saving behavior among this group through the conservative use of air conditioning. This is further supported by the fact that cooling accounts for 4.4% of CARE customer load compared to 6% for non-CARE customers.

Figure 3 shows the average daily load shape by season for EBCE's CARE vs non-CARE customers. The pink square represents summer, the green winter, and the blue is the shoulder season. CARE customers are represented by the dotted red line. This shows that CARE customers use slightly less energy than their non-CARE counterparts in the morning hours and summer evening peak (2019 data).

[15] City of Tracy, California. U.S. Census Bureau

[16] 06/2021 data

Figure 3: Daily Load Shape Comparison of CARE and non-CARE customers, by season



When customers are unable to pay their electricity bill, they are in arrearage with EBCE and begin to accumulate an outstanding balance due. Understanding arrearage trends provides valuable insights into opportunities for energy efficiency programs to serve customers who repeatedly struggle to pay their energy bills and help protect them from disconnection. The fact that customers with high energy use and greater arrearages are more likely at risk for disconnection further emphasizes the need for EE programs aimed at serving this population to focus on maximizing energy use reductions to reduce energy burden. CARE customers account for only about 22.6% of EBCE's residential customers while accounting for 46.3% of total residential arrearages. This illustrates that discounted energy bills are often not enough to assist these customers in paying their bills and that further measures to reduce energy costs, like energy efficiency, would be of great financial benefit.

Though energy efficiency in California has led to a comparatively lower energy burden than other regions of the country, energy burden for low-income households across the state continues to be higher than national averages.[17] In order to calculate energy burden, one must factor in energy costs compared to income. While energy costs for EBCE customers are easy to track down, household income is much more difficult and for analysis of EBCE customers, only census tract income data is available for this calculation. While total energy consumption rises steadily as income increases, the lowest income bracket faces the highest energy burden even despite representing the lowest average energy user. This disparity illustrates the need for energy efficiency programs to prioritize maximizing overall energy savings for low-income customers to reduce the cost burden of energy use. Comparatively, programs designed for the general or higher-income customer may chase energy and cost savings in the form of load shifting and demand response.

This program is designed to target both low-income (200% of poverty level) as well as moderate-income (up to 120% AMI) customers, though incentives will be scaled based on income. Low-income customers have historically been excluded from participation in energy efficiency programs, as they frequently lack decision-making authority over their homes (in the case of renters), may not have cash reserves sufficient to cover costs of projects, and may struggle to borrow money, even with the presence of incentives. Even with healthy incentives, many projects are unable to move forward due to the level of health and safety measures or basic home repair that needs to take place as a result of years of underinvestment. This program is designed to cover a significant portion of the upfront cost of energy-related

[17] California's Low-Income Face a Disproportionate Energy Burden, but Efficiency Can Reduce It, National Resources Defense Council

measures and will be paired with available financing solutions. This combination of deep incentives for energy measures, project cost reduction, and along with financing solutions helps to ensure that with no upfront-cost requirement participants will be able to access the program benefits.

The moderate-income tranche of the program is an important target audience. These customers will receive lower incentive investments (targeted at 60% of the cost of energy related measures) but will still receive no-upfront-cost solutions. The moderate-income segment is typically made up of homeowners who are willing and able to make investments in their property but suffer from lack of access to financing from traditional programs.[18] This customer segment frequently lacks cash on hand and therefore is also unable to participate in programs that require cash on hand, even where incentives may be available to reduce overall project cost.

EBCE's service area is characterized by a high cost of living, with over 320,000 residential accounts estimated to be at or below 120% of AMI, 203,858 estimated to be at or below 80% of AMI, and 129,000 accounts which are enrolled in CARE. [19] While the level of need across these categories varies, more than half of EBCE's customer accounts qualify for some level of support. EBCE is limited on the proportion of budget that can be allocated to serve these customers (capped at 30% of portfolio budget), and the resulting estimated market penetration for this program is very low (0.02% per year). EBCE is continuing to explore pathways to scale up investment in this underserved market segment, including by leveraging other program resources and emerging innovative financing models (such as the tariffed-on-bill financing program being explored in the Clean Energy Financing Proceeding, R.20-08-022).

C. Deliverables

The EBCE LMI Residential Electrification Program will provide packages of measures tailored to EBCE's goal of maximizing overall energy savings for low- and moderate-income customers to reduce the cost burden of energy use. Customers will also be offered education on time-of-use rates to minimize the bill impacts associated with electrification of appliances typically used during peak periods (*e.g.*, water heaters, space conditioning, cooking). The program may also offer a financing solution to enable participation at no upfront cost and help to ensure bill stability or bill reductions for program participants. Measures could include but are not limited to the following:

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[18] Zimring, Mark et al. "Scaling Energy Efficiency in the Heart of the Residential Market: Increasing Middle America's Access to Capital for Energy Improvements." https://eta-publications.lbl.gov/sites/default/files/mi-policybrief-3-6-2012.pdf

[19] *County-level aggregate data for Alameda & San Joaquin: https://data.census.gov/cedsci/table?q=DP03&g=0500000US06001,06077&tid=ACSDP1Y2019.DP03&hidePreview=true. EBCE account information used to supply total number of residential accounts and accounts enrolled in CARE.*

- Building envelope
- Heat pump technology (space conditioning, water heating)
- Induction cooking
- Programmable thermostats
- LED lighting

EBCE's program design is flexible, adaptive, and innovative. We will explore and incorporate new offerings over time that will advance and be consistent with state goals while aligning to and supporting new local emerging markets such as:

- Residential building electrification
- Workforce opportunities for new entrants and transitioning fossil fuel employees
- Combined EE / DR deployment

D. Program Innovation

EBCE is seeking to pilot an innovative new delivery model for LMI electrification work, combining ESCO-based program delivery to remove upfront costs, verifying incentives via measured approaches, and targeting building electrification with demand management and TOU education. This package of innovations together should provide important learning opportunities to the State as a whole and should position EBCE to scale up investment in building decarbonization with an emphasis on a just and equitable transition.

E. Program Process

The following tasks outline expected program processes.

Task 1: Vendor Selection and Program Launch

EBCE will be seeking an implementation partner for the LMI Electrification program. Following CPUC approval of the Advice Letter, EBCE will release solicitation materials to find qualified vendors. Implementers will be selected based on the ability to offer a best-fit program design, partnership of local Community-Based Organizations ("CBOs") for marketing and outreach, strong quality assurance and quality control provisions, incorporation of workforce development opportunities, and coordination with other PA and Distributed Energy Resources ("DER") programs to minimize overlap and maximize the program impact (including specifically solar and storage).

Following selection of a vendor, EBCE will be poised to launch the program soon and is targeting full program rollout within three months of Advice Letter approval. EBCE has developed multiple internal systems to facilitate implementation of customer programs, including a customer relationship management (CRM) platform, data and analytics capabilities to facilitate targeted marketing and tracking, internal application and incentive processing systems, and customer outreach strategies and materials. EBCE will work with the selected

vendor to finalize program design, onboard the vendor to EBCE's internal systems, and identify CBO partners.

Task 2: Marketing and Outreach

EBCE's selected implementation contractor will be responsible for developing a plan to target single-family low- to moderate-income residential customers (defined as below 120% of AMI). The target market sector for this program is defined as hard to reach, featuring many customers who have reported speaking a language other than English at home and renters. To succeed with marketing this program, EBCE will be coordinating closely with community-based organizations who already have a footprint in our communities. CBOs will be provided with program toolkits to facilitate successful communication on the program and its objectives and will be welcomed to review and provide feedback to EBCE on the content of these toolkits. Outreach materials will be provided in a minimum of three languages (English, Spanish, and written Chinese); other languages may be provided upon consultation with relevant CBOs.

EBCE also plans to leverage our data and analytics capabilities to target customers who may benefit the most from this program. Potential targeting parameters include:

- High energy consumption
- History of arrearages
- Existing NEM customers
- Top contributors to evening peak load
- In-language billing preferences other than English

In addition to the EBCE energy consumption data set, EBCE has been collecting data on criteria air pollutants ("CAP") associated with point source polluters and has transcribed these datasets to mapping software that allows EBCE to quickly identify neighborhoods with high percentages of CAPs. Given the potential benefits to indoor air quality associated with building envelope measures and building electrification projects, houses in these impacted neighborhoods will be a high priority for enrollment into the program.

Task 3: Interventions

EBCE anticipates soliciting a third-party to implement this program and will be seeking an implementation partner who offers solutions to remove first cost barriers for customers. This could include an ESCO and/or implementor with a financing solution who can offer participation at no upfront cost and help to ensure bill stability or bill reductions for program participants. EBCE is also actively engaged in the development of a tariffed on-bill (TOB) solution and plans to leverage TOB solutions when available. TOB solutions could be ideal for the LMI market as they may offer expanded underwriting criteria as compared to traditional financing approaches.

The program will provide packages of measures, including building envelope and appliance replacement, to improve the baseline efficiency of participating residents' homes. The program will also seek to leverage the EBCE Resilient Home program, which provides solar and battery

installations for residential customers, as well as any income qualified solar and storage programs (SASH, SGIP).

Task 4: Measurement

EBCE plans to quantify savings impacts through a population level pay-for-performance approach. Prospective customers will be validated for data sufficiency and EBCE customer status prior to enrollment. Savings will be verified on an experimental design basis, with customers separated into treatment and control groups.

F. Commencement Date & Activities

The program will begin approximately three months from the approval of EBCE's Advice Letter and will run for three years. In developing this portfolio, EBCE is building upon an existing foundation of experience and resources from current pilots of similar program concepts, which should support the timely and efficient launch of the proposed programs. For example, EBCE has invested in data and analytics capabilities to target potential customers on characteristics such as home age, energy usage, and CARE enrollment status. In initial pilot programs, EBCE tested the theory that targeting would result in a more qualified pipeline of leads with promising results.[20] EBCE has additionally invested in online rebate application platforms that allow for streamlined review of incentive processing, including automatic eligibility checks, and automated messaging when projects hit certain milestones. The early infrastructure developed, and lessons learned from these pilots help to inform program design and cost-effectiveness inputs and will ensure a quicker ramp-up time for these programs to reach scale.

Given the necessary lag in quantifying program impacts from P4P programs, the initial savings results will not be available until a minimum of 14 months following program rollout, and the final savings figures and incentive spend from the initial three-year implementation will not be available until 14 months after the final project is completed.

Below is a high-level schedule of tasks for the initial program launch. Once the program is enrolling customers, tasks 1-4 will be continuously operational. Time brackets identified around tasks 3 and 4 represent estimated time for a single project (i.e., measurement begins with project interventions but continues a full 14 months following project completion).

Task 0: Administrative (0-3 months)

Task 1: Customer Acquisition (starting at 3 months)

Task 2: Interventions (starting at 5 months)

Task 3: Measurement (5-19 months)

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[20] EBCE ran initial pilot programs focused on the single-family residential market, and targeted marketing to customers who were in the top tiers of energy consumption from among the eligible population. While timing constrained the ability to enroll some of these customers in the programs, the program implementer relayed that the leads received were better qualified as a group than those who enrolled through other marketing pipelines.

Task 4: Incentive Processing and Reporting (19 months)

G. Cost-Effectiveness Analysis

As an equity program, the EBCE LMI Residential Electrification Program is not subject to a cost-effectiveness threshold. Program success will be measured by the ability of low to moderate income residential customers to achieve higher energy savings, reduced energy costs, and reduced energy usage during peak demand periods.[21]

H. Demand Reduction, Energy Savings, and Other Measures of Success

EBCE expects that first-year gross energy savings for the program will be 998,538 kWh with demand savings of 75 kW. EBCE's portfolio-wide first-year TSB is forecasted at $3,854,288. Additional measures of success will include, but not be limited to:

- 50% of program funds will be deployed to support customers at or below 80% of area median income (AMI)
- 80% of projects will include electrification of an existing appliance
- 30% of projects will include demand management strategies and bill management education.

I. Budget

The three-year budget for the EBCE LMI Residential Electrification Program is $2,997,897. The budget breakdown is shown below.

Table 7: EBCE Three-Year Program Budget - LMI Residential Electrification Program

Program Function	Budget Amount
Administration	$299,790
Marketing, Education and Outreach	$179,874
Direct Implementation Non-Incentive	$599,580
Direct Implementation Incentive	$1,798,737
EM&V	$119,916
Three-Year Program Budget	**$2,997,897**

J. Collaboration with Existing Programs

EBCE has good working relationships with the two existing Program Administrators in our service area, PG&E and the BayREN. The LMI Residential Electrification program complements

[21] EBCE will also incorporate forthcoming guidance and metrics from the California Energy Efficiency Coordinating Committee (CAEECC) Market Sector Metrics and Equity Metrics Working Groups, which are charged with identifying and defining key objectives and metrics for the new Market Support and Equity portfolio segments codified in D.21-05-031.

the BayREN Home+ program with its emphasis on serving income qualified customer segments. EBCE anticipates working with BayREN to help co-refer out from the LMI Residential Electrification program to the BayREN Home+ program depending on which program is a better fit for customers. There is not a comparable PG&E program available in EBCE service area, but EBCE anticipates working with PG&E to provide marketing materials on EBCE's program so PG&E account representatives will be equipped to make referrals.

Consistency with Commission Requirements

EBCE's programs will deliver cost-effective energy savings to our customers while remaining consistent with CPUC goals, supporting EBCE's goal of providing 100% clean energy by 2030, and aligning to our statement of intent to implement a CCA program that includes universal access, reliability, and equitable treatment of all customer classes.

EBCE has and will continue to prioritize advancing the public interest as aligned with Public Utilities Code sections 399.4 and 381.1. EBCE's programs are consistent with broader regional or statewide energy efficiency programs and are designed to integrate demand side management activities in a way that will value stack the deployment of distributed energy resources. This will support relevant rulings and decisions such as, but not limited to, D.07-10-032 and D.12-11-015.

EBCE's Plan is consistent with the "elect to administer" pathway for CCA program administration as defined in D.14-01-033. EBCE's plan also conforms to recent guidance from CPUC in D.21-05-031 that directs all PAs to segment their portfolios based on primary program purpose into three categories: resource acquisition, equity, and market support.[22] EBCE's Plan includes programs segmented into resource acquisition (Commercial P4P Program) and equity (LMI Residential Electrification Program) categories. EBCE's resource acquisition program meets a 1.0 TRC on a forecasted basis as directed by CPUC in D.21-05-032, and our equity program budget does not exceed 30% of the portfolio budget.

D.21-05-031 also directs PAs to report on a new Total System Benefit (TSB) metric,[23] which EBCE has estimated for our portfolio and included in our Plan.

EBCE's programs will fully follow Public Utilities Code Section 399.4 requirements that participants comply with applicable permitting requirements. Participating contractors will be required to pull permits as required by code. EBCE will comply with Section 399.4(b)(1) by requiring all installing contractors or non-residential and residential customers who receive a rebate or incentive to certify that they have complied with Title 24.

EBCE's Plan will show that it complies with Section 399.4(c) by prioritizing local and regional interests in our program portfolio design, and by proposing to incorporate local governments, community-based organizations, and energy efficiency service providers as participants in program implementation where appropriate.

[22] D.21-05-031 OP 2 at 81

[23] Ibid, OP 1 at 80

EBCE's proposed Commercial Pay-for-Performance Program supports the mandate set forth in Section 399.4(d)(2) by providing incentives that are linked to measured energy savings. EBCE programs will fulfill the Section 399.4 requirement that incentives be based on values and methodology stated in customer agreements and derived from measured results. EBCE understands that cost-effectiveness calculations require specific inputs: costs (project costs and incentives) and benefits (energy savings). EBCE is committed to accurately forecasting portfolio averaged incentive values to ensure cost-effectiveness calculations are accurate, achievable, and based on realistic and timebound values.

Compliance with Section 399.4(d)(2) will also support the goals noted in D.07-10-032 for overcoming barriers to more widespread adoption of energy efficiency and capturing longer-term savings, and the roadmap for energy efficiency beyond 2020 as established in the subsequent California Long-Term Energy Efficiency Strategic Plan (Strategic Plan) adopted in D.08-09-040.

By acting as point of contact for EBCE customers, EBCE will simplify the goals set forth in Section 381.1 ensuring that local and statewide goals are met, such as those associated with Senate Bill 350. The proposed Plan also supports the State's goals to decarbonize California as detailed in the 2021 Integrated Energy Policy Report ("IEPR") Final Scoping Order. The California Energy Commission is committed to advancing building decarbonization incentive programs, while assessing existing and future policies and programs in an equitable manner. EBCE's Plan aligns with such goals as we enroll customers into Energy Efficiency incentive programs that save customers money and reduce emissions. Particularly, the residential program is aimed at meeting our low- and moderate-income customers' needs by offering a program that does not include upfront costs. The purpose of this program is to expedite the participation of EBCE's lower-income communities, resulting in a more just transition to electrification.

Accommodation of Statewide and Regional Programs

EBCE has targeted a portfolio of customers based on how it can best serve our constituents and on how these programs can facilitate the low carbon and high renewable energy content of EBCE's load. While avoiding selection of target sectors that are currently served by statewide programs, EBCE has selected some measures which may overlap with statewide programs (*e.g.*, lighting measures). These measures were included to achieve the required TRC. Given the presence of both BayREN and PG&E in EBCE's service area, some customer sectors were not targeted for this program given the prevalence of programs that are available to serve them. For example, EBCE has opted to not pursue programs targeted to the multifamily sector or to the small commercial sector given BayREN's programs in these areas.

EBCE has a target of achieving a 100% carbon free electricity product by 2030, and the engagement of the major customers contributing to our load (non-residential accounts) will be an important component of meeting these resource targets. By reducing energy use when it is both most expensive and most GHG intensive, EBCE will engage our customers in helping to accomplish the targets for carbon-free electricity and will reduce costs for all customers.

In the instances of program overlap with existing regional programs (for example, BayREN Home+ and the PG&E commercial pay-for-performance program), EBCE plans to work directly with program staff at each PA to develop systems for verifying that customers have not dual enrolled in programs.

The rollout of third-party programs has increased the difficulty of local coordination, both because there are many programs for which details are still forthcoming, and because these implementers are under no obligation to coordinate with a CCA Administrator to minimize overlap and reduce customer confusion. EBCE plans to coordinate closely with PG&E to encourage collaboration between selected third-party vendors – particularly those whose programs have not yet launched – and to minimize customer confusion to the greatest extent possible. EBCE will additionally be requesting customer signatures verifying that customers have not requested funding from other programs for the same scope of work.

EBCE is a public agency and is committed to supporting the best interests of our customers and constituents. To that end, EBCE will consistently recommend leveraging statewide and regional programs when and where they are staged to provide the best service to our customer base. EBCE will continue coordination with PG&E and BayREN to ensure that both PAs understand what EBCE is offering to our customers, and to ensure EBCE's information on PG&E/BayREN programs is up to date. This will enable all PAs to help navigate which offerings may be best suited to serve potential customers. In the instances where EBCE receives program applications from non-CCA customers who are not eligible for enrollment in the CCA product, EBCE will work with BayREN and/or PG&E staff to help those customers find the best suited program for their needs.

Auditing and Reporting

EBCE performs annual financial audits using generally accepted accounting principles specific to government entities. These reports are publicly available and will be provided to the CPUC upon request. As a Joint Powers Authority, once EBCE's energy efficiency plan is certified and programs begin, current auditing procedures will be extended to include energy efficiency program administration data. This will ensure appropriate accounting controls for energy efficiency program funds.

Per requirement of the Governmental Accounting Standards Board Statement No. 34, the management's discussion and analysis will be included to supplement the basic financial statements. To evaluate the effective use of resources and management procedures, EBCE will also complete all regulatory filings and reports as directed by CPUC staff. These documents will provide the results of program efforts that can be evaluated against the performance metrics identified by EBCE, including adherence to cost-effectiveness requirements.

EBCE will take all necessary actions to remain compliant with additional auditing and reporting requirements.

Evaluation, Measurement and Verification Protocols

EBCE will contract with an independent third-party to perform process evaluation or market studies to assess the effectiveness of program implementation activities and evaluate challenges and opportunities in the EBCE service territory. EBCE-led studies will be performed according to the Commission oversight process of IOU Evaluation Measurement and Verification (EM&V) projects as detailed in the Energy Efficiency EM&V Plan. EBCE will be subject to the same protocol as IOUs for CPUC-directed impact evaluations to determine actual energy savings, benefits, costs, and goal achievement as directed in D. 05-01-055. EBCE expects to dedicate no more than 3% of total program budget during the three-year program to evaluate the program and market.

Evaluations directed by EBCE will focus on market conditions and needs, program design flaws or opportunities for improvement, and solutions to address those challenges. These evaluations will measure indirect program impact (*e.g.*, behavioral changes), and market impacts resulting from induced market changes (*e.g.*, job creation), while CPUC-directed impact evaluations will measure direct program impacts (*e.g.*, energy savings). EBCE will avoid duplication and build on existing efforts by referring to existing EM&V studies led by IOUs and the CPUC.

Data sources for program EM&V activities could include but not be limited to program databases, program descriptions, implementation plans, surveys and actual energy savings at the meter, interviews, marketing collateral, and work papers developed for or used during program implementation. Objectives include, but will not be limited to:

- Compare EBCE's program to other similar program offerings.
- Evaluate successes, failures, and replicability of the program.
- Evaluate the unique challenges and opportunities of the EBCE market and determine viable solutions.
- Compare *ex ante* and *ex post* data.

Performance Metrics

The following Performance Metrics will indicate progress toward meeting the goals and objectives of the CPUC Energy Efficiency Strategic Plan and EBCE goals. The specific objective of Public Utilities Code Section 381.1(f) that each metric addresses (if applicable) is included in parenthesis.

- Program energy savings (381.1(f)(2))
- Tracking and serving underserved communities, including hard-to-reach (HTR) commercial customers (381.1(f)(1))
- Cost-effectiveness tool ("CET") output
- Tracking the Program cost-effectiveness annually (381.1(f)(2))
- Number of projects referred to other EE or other DER programs (381.1(f)(3))

- Percentage of recommended measures installed by customers (381.1(f)(4))
- Percentage of customers who receive electrification measures
- Percentage of customers who receive TOU education and peak management tools
- Increase in participation among disadvantaged community customers relative to existing IOU program baseline
- Percent of budget contracted with local and / or Disabled Veteran Business Enterprise (DVBE) businesses
- EM&V process, tracking, and incorporation into program design (381.1(f)(5))
- EM&V of project energy savings forecasts and energy savings realized (381.1(f)(5))

Within this section EBCE summarizes the specific metrics to be used as targets against which to measure performance of the programs and portfolio.

Table 8: Installation Metrics – Commercial P4P Program

Commercial P4P				
	Year 1	**Year 2**	**Year 3**	**Total**
Projects Completed	125	125	125	**375**

Table 9: Installation Metrics – LMI Residential Electrification Program

LMI Residential Electrification				
	Year 1	**Year 2**	**Year 3**	**Total**
Projects Completed	71	71	71	**213**

Table 10: Market Penetration – Commercial P4P Program

Commercial P4P				
	Year 1	**Year 2**	**Year 3**	**Total**
Market Penetration	0.50%	0.50%	0.50%	**1.5%**

Market penetration calculated based on 25,014 eligible EBCE customers. Baseline calculated on 2019 eligible EBCE customers.

Table 11: Market Penetration – LMI Residential Electrification Program

LMI Residential Electrification				
	Year 1	**Year 2**	**Year 3**	**Total**
Market Penetration	0.02%	0.02%	0.02%	**0.06%**

Market penetration calculated based on 326,164 eligible EBCE customer accounts estimated to be at or below 120% area median income (AMI). Baseline calculated on 2019 eligible EBCE customers.

Table 12: Savings Metrics – Commercial P4P Program

Commercial P4P				
	Year 1	**Year 2**	**Year 3**	**Total**
Gross kWh	4,389,454	4,389,454	4,389,454	**13,168,362**
Net kWh	4,169,981	4,169,981	4,169,981	**12,509,943**
Gross kW	501	501	501	**1,503**
Net kW	476	476	476	**1,428**

Table 13: Savings Metrics – LMI Residential Electrification Program

LMI Residential Electrification				
	Year 1	**Year 2**	**Year 3**	**Total**
Gross kWh	998,538	998,538	998,538	**2,995,613**
Net kWh	748,822	748,822	748,822	**2,246,465**
Gross kW	75	75	75	**224**
Net kW	41	41	41	**123**

Table 14: Portfolio Savings Metrics

Commercial P4P + LMI Residential Electrification				
	Year 1	**Year 2**	**Year 3**	**Total**
Gross kWh	5,387,991	5,387,991	5,387,991	**16,163,973**
Net kWh	4,918,803	4,918,803	4,918,803	**14,756,409**
Gross kW	576	576	576	**1,728**
Net kW	517	517	517	**1,551**

Funding Determination

EBCE's budget conforms to CPUC guidance as described below and elsewhere in this Advice Letter and Program Plan. In accordance with D.21-05-031 EBCE has proposed an equity program (LMI Residential Electrification Program) with a three-year budget of $2,997,897, which is equal to 30% of the total portfolio budget. EBCE's proposed resource acquisition program (Commercial P4P Program) has a three-year budget of $6,995,097, equal to 70% of the total portfolio budget.

Given the uncertainty surrounding the ongoing COVID-19 pandemic, EBCE proposes that administration, marketing, education and outreach, and direct implementation non-incentive costs may remain constant across the three-year program period. Moreover, EBCE is leveraging

our experience and existing resources from current pilots of similar program concepts, which should support the timely and efficient launch of the proposed programs.

Resolution E-4518 states that "funding collection and program periods do not always correspond" and that there is no statutory requirement for funding collection to begin subsequent to Commission certification of the plan. Marin Energy Authority (now referred to as MCE) was provided a collection period starting on the original draft submittal date. Based on this precedent, EBCE finds it reasonable to request the CPUC to direct transfer of energy efficiency funds collected from EBCE's customers beginning on October 22, 2021, EBCE's advice letter filing date.

To calculate energy efficiency non-bypassable charge collections from EBCE's customers in 2021, EBCE used fee per kWh data and load data from PG&E, SMUD, and CAISO. To determine the portion of funding used for statewide and regional programs, EBCE used the program budget from PG&E's 2021 Annual Budget Advice Letter (ABAL). Under this budget, 96.63% of funds are budgeted to go to statewide, regional and uncategorized programs, and 3.37% are budgeted to go to local programs.[24] EBCE's first-year not to exceed value is 3.37% of the total non-bypassable funds collected from EBCE customers for EE programs in 2021. EBCE's three-year not to exceed budget for our LMI Residential Electrification and Commercial P4P Programs is $9,992,994.

EBCE plans to hire one or two staff to support administration of the program but will be allocating the majority of funding under these two program areas to third party implementers and incentives. Marketing and outreach dollars will be administered in house and EBCE will design and implement marketing campaigns with the assistance of the EBCE marketing team.

Table 15: Program Portfolio Funding Determination

	Year 1	Year 2	Year 3	Total
Administration	$333,100	$333,100	$333,100	**$999,300**
Marketing, Education and Outreach	$199,860	$199,860	$199,860	**$599,580**
Direct Implementation Non-Incentive	$666,200	$666,200	$666,200	**$1,998,600**
Direct Implementation Incentive	$1,998,598	$1,998,598	$1,998,598	**$5,995,794**
EM&V	$133,240	$133,240	$133,240	**$399,720**
Portfolio Budget	**$3,330,998**	**$3,330,998**	**$3,330,998**	**$9,992,994**

[24] To calculate energy efficiency non-bypassable charge collections from EBCE's customers in 2021, EBCE used fee per kWh data and load data from PG&E, SMUD, and CAISO as well as PG&E's 2021 ABAL program budget. PG&E programs included as local or other programs, consistent with communications with PG&E and CPUC, and therefore eligible to be included in EBCE's funding determination are: PGE2110051 (Local Government Energy Action Resources), PGE_Pub_001 (Central Coast Leaders in Energy Action Program), PGE_Pub_002 (Marin Energy Watch Partnership), PGE_Pub_003 (Redwood Coast Energy Watch), PGE_Pub_004 (Central California Energy Watch), PGE_Pub_005 (San Mateo County Energy Watch Program), PGE_Pub_006 (Energy Access SF), PGE_Pub_007 (Sierra Nevada Energy Watch), and PGE_Pub_008 (Sonoma Public Energy).

Appendix A: TSB and Cost-Effectiveness Calculations

This appendix contains first-year cost-effectiveness measure and program cost input and output tables.

First-Year Cost-Effectiveness Measure Inputs: Commercial P4P Program and LMI Residential Electrification Program

CEInputID	PrgID	ClaimYear Quarter	Sector	DeliveryType	BldgType	E3ClimateZone	E3GasSavProfile	E3GasSector
1	EBCE-COM-001	2022Q1	Com	DnCust	Com	3A	Annual	Commercial
2	EBCE-COM-001	2022Q1	Com	DnCust	Com	3A	Annual	Commercial
3	EBCE-COM-001	2022Q1	Com	DnCust	Com	3A	Annual	Commercial
4	EBCE-COM-001	2022Q1	Com	DnCust	Com	12	Annual	Commercial
5	EBCE-COM-001	2022Q1	Com	DnCust	Com	12	Annual	Commercial
6	EBCE-COM-001	2022Q1	Com	DnCust	Com	12	Annual	Commercial
EBCE-2022-CI1	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	3A	Annual	Residential
EBCE-2022-CI81	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	12	Annual	Residential
EBCE-2022-HP1	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	3A	Annual	Residential
EBCE-2022-HP2	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	12	Annual	Residential
EBCE-2022-HP3	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	3A	Annual	Residential
EBCE-2022-HP4	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	12	Annual	Residential
EBCE-2022-CD1	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	3A	Annual	Residential
EBCE-2022-CD2	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	12	Annual	Residential
EBCE-2022-CD3	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	3A	Annual	Residential
EBCE-2022-CD4	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	12	Annual	Residential
EBCE-2022-HPWH1	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	3A	Annual	Residential
EBCE-2022-HPWH2	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	12	Annual	Residential
EBCE-2022-HPWH3	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	3A	Annual	Residential
EBCE-2022-HPWH4	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	12	Annual	Residential
EBCE-2022-HPWH5	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	3A	Annual	Residential
EBCE-2022-HPWH6	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	12	Annual	Residential
EBCE-2022-HPWH7	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	3A	Annual	Residential
EBCE-2022-HPWH8	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	12	Annual	Residential
EBCE-2022-INCOOK1	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	3A	Annual	Residential
EBCE-2022-INCOOK2	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	12	Annual	Residential
EBCE-2022-INCOOK3	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	3A	Annual	Residential
EBCE-2022-INCOOK4	EBCE-RES-001	2022Q3	Residential	DnDeemed	SFm	12	Annual	Residential

E3MeaElecEndUseShape	E3TargetSector	MeasAppType	MeasCode	MeasDescription	MeasImpactType
DEER:Indoor_Non-CFL_Ltg	Non_Res	NR	MBCAP	DEER:Indoor_Non-CFL_Ltg	Cust-NMEC
DEER:HVAC_Chillers	Non_Res	NR	MBCAP	DEER:HVAC_Chillers	Cust-NMEC
DEER:HVAC_Split-Package_HP	Non_Res	NR	MBCAP	DEER:HVAC_Split-Package_HP	Cust-NMEC
DEER:Indoor_Non-CFL_Ltg	Non_Res	NR	MBCAP	DEER:Indoor_Non-CFL_Ltg	Cust-NMEC
DEER:HVAC_Chillers	Non_Res	NR	MBCAP	DEER:HVAC_Chillers	Cust-NMEC
DEER:HVAC_Split-Package_HP	Non_Res	NR	MBCAP	DEER:HVAC_Split-Package_HP	Cust-NMEC
DEER:Res_BldgShell_Ins	Res	AOE	SWBE006	Ceiling - Add R-30 batts on top of vintage-specific exisiting insulation, SFm, CZ03	Deem-DEER
DEER:Res_BldgShell_Ins	Res	AOE	SWBE006	Ceiling - Add R-30 batts on top of vintage-specific exisiting insulation, SFm, CZ12	Deem-DEER
DEER:HVAC_Eff_HP	Res	AR	SWHC045	Res DXHP SEER >= 15 and HSPF >= 8.7, SFm, CZ03, AR	Deem-WP-FuelSub
DEER:HVAC_Eff_HP	Res	AR	SWHC045	Res DXHP SEER >= 15 and HSPF >= 8.7, SFm, CZ12, AR	Deem-WP-FuelSub
DEER:HVAC_Eff_HP	Res	AR	SWHC045	Res DXHP SEER >= 16 and HSPF >= 9, SFm, CZ03, AR	Deem-WP-FuelSub
DEER:HVAC_Eff_HP	Res	AR	SWHC045	Res DXHP SEER >= 16 and HSPF >= 9, SFm, CZ12, AR	Deem-WP-FuelSub
DEER:Res_ClothesDishWasher	Res	NR	SWAP014	Heat Pump Clothes Dryer, Residential, Fuel Substitution	Deem-WP-FuelSub
DEER:Res_ClothesDishWasher	Res	NR	SWAP014	Heat Pump Clothes Dryer, Residential, Fuel Substitution	Deem-WP-FuelSub
DEER:Res_ClothesDishWasher	Res	NR	SWAP014	Heat Pump Clothes Dryer, Residential, Fuel Substitution	Deem-WP-FuelSub
DEER:Res_ClothesDishWasher	Res	NR	SWAP014	Heat Pump Clothes Dryer, Residential, Fuel Substitution	Deem-WP-FuelSub
DEER:Res_ClothesDishWasher	Res	NR	SWWH014	Heat Pump Water Heater, Residential	Deem-DEER
DEER:Res_ClothesDishWasher	Res	NR	SWWH014	Heat Pump Water Heater, Residential	Deem-DEER
DEER:Res_ClothesDishWasher	Res	NR	SWWH014	Heat Pump Water Heater, Residential	Deem-DEER
DEER:Res_ClothesDishWasher	Res	NR	SWWH014	Heat Pump Water Heater, Residential	Deem-DEER
DEER:Res_ClothesDishWasher	Res	NR	SWWH014	Heat Pump Water Heater, Residential	Deem-DEER
DEER:Res_ClothesDishWasher	Res	NR	SWWH014	Heat Pump Water Heater, Residential	Deem-DEER
DEER:Res_ClothesDishWasher	Res	NR	SWWH014	Heat Pump Water Heater, Residential	Deem-DEER
DEER:Res_ClothesDishWasher	Res	NR	SWWH014	Heat Pump Water Heater, Residential	Deem-DEER
DEER:Res_ClothesDishWasher	Res	NR	SWAP015	Induction cooktop, CZ03	Deem-WP
DEER:Res_ClothesDishWasher	Res	NR	SWAP015	Induction cooktop, CZ12	Deem-WP
DEER:Res_ClothesDishWasher	Res	NR	SWAP015	Electric range with induction cooktop, CZ03	Deem-WP
DEER:Res_ClothesDishWasher	Res	NR	SWAP015	Electric range with induction cooktop, CZ12	Deem-WP

MeasureID	TechGroup	TechType	UseCategory	UseSubCategory
	Ltg_Lamp	LED_lamp	Lighting	InGen
	HV_Tech	RoomAC	HVAC	HeatCool
	HV_Tech	HP_EF	HVAC	HeatCool
	Ltg_Lamp	LED_lamp	Lighting	InGen
	HV_Tech	RoomAC	HVAC	HeatCool
	HV_Tech	HP_EF	HVAC	HeatCool
RB-BS-CeilIns-VintR-AddR30	BldgShell	AttBatIns	BldgEnv	Opaque
RB-BS-CeilIns-VintR-AddR30	BldgShell	AttBatIns	BldgEnv	Opaque
SplitHP1SpRes-S15-H8.7	dxHP_equip	spltSEER	HVAC	HeatCool
SplitHP1SpRes-S15-H8.7	dxHP_equip	spltSEER	HVAC	HeatCool
SplitHP2SpRes-S16-H9	dxHP_equip	spltSEER	HVAC	HeatCool
SplitHP2SpRes-S16-H9	dxHP_equip	spltSEER	HVAC	HeatCool
DEER:Res_ClothesDishWasher	Clean_equip	ClothesWash	AppPlug	Laundry
DEER:Res_ClothesDishWasher	Clean_equip	ClothesWash	AppPlug	Laundry
DEER:Res_ClothesDishWasher	Clean_equip	ClothesWash	AppPlug	Laundry
DEER:Res_ClothesDishWasher	Clean_equip	ClothesWash	AppPlug	Laundry
RE-WtrHt-SmlStrg-HP-lte6kW-rep30G-MD-3p09UEF-50g	WaterHtg_eq	HP_UEF	SHW	Heating
RE-WtrHt-SmlStrg-HP-lte6kW-rep30G-MD-3p09UEF-50g	WaterHtg_eq	HP_UEF	SHW	Heating
RE-WtrHt-SmlStrg-HP-lte6kW-rep40G-MD-3p09UEF-50g	WaterHtg_eq	HP_UEF	SHW	Heating
RE-WtrHt-SmlStrg-HP-lte6kW-rep40G-MD-3p09UEF-50g	WaterHtg_eq	HP_UEF	SHW	Heating
RE-WtrHt-SmlStrg-HP-lte6kW-rep30G-MD-3p31UEF-50g	WaterHtg_eq	HP_UEF	SHW	Heating
RE-WtrHt-SmlStrg-HP-lte6kW-rep30G-MD-3p31UEF-50g	WaterHtg_eq	HP_UEF	SHW	Heating
RE-WtrHt-SmlStrg-HP-lte6kW-rep40G-MD-3p31UEF-50g	WaterHtg_eq	HP_UEF	SHW	Heating
RE-WtrHt-SmlStrg-HP-lte6kW-rep40G-MD-3p31UEF-50g	WaterHtg_eq	HP_UEF	SHW	Heating
	Cook_equip	Cooking	AppPlug	KitchenApp
	Cook_equip	Cooking	AppPlug	KitchenApp
	Cook_equip	Cooking	AppPlug	KitchenApp
	Cook_equip	Cooking	AppPlug	KitchenApp

PreDesc	StdDesc	SourceDesc	Version	NormUnit	NumUnits	UnitkW1stBaseline	UnitkWh1stBaseline
				Each	505	0.68847032	6031
				Each	391	0.241324201	2114
				Each	66	-0.114155251	-1000
				Each	142	0.68847032	6031
				Each	110	0.241324201	2114
				Each	18	-0.114155251	-1000
Standard Efficiency Equipment	Standard Efficiency Equipment	SWBE006	DEER2021	Area-ft2	182958.8	0	0.05052
Standard Efficiency Equipment	Standard Efficiency Equipment	SWBE006	DEER2021	Area-ft2	9629.41	0	0.02892
Standard Efficiency Equipment	Standard Efficiency Equipment	SWHC045	DEER2021	Cap-Tons	81.32	0	102.89
Standard Efficiency Equipment	Standard Efficiency Equipment	SWHC045	DEER2021	Cap-Tons	4.28	0	479.18
Standard Efficiency Equipment	Standard Efficiency Equipment	SWHC045	DEER2021	Cap-Tons	81.32	0	102.89
Standard Efficiency Equipment	Standard Efficiency Equipment	SWHC045	DEER2021	Cap-Tons	4.28	0	479.18
Standard Efficiency Equipment	Standard Efficiency Equipment	SWAP014	DEER2021	Each	3	0	32.94
Standard Efficiency Equipment	Standard Efficiency Equipment	SWAP014	DEER2021	Each	3	0	66.13
Standard Efficiency Equipment	Standard Efficiency Equipment	SWAP014	DEER2021	Each	5	0	44
Standard Efficiency Equipment	Standard Efficiency Equipment	SWAP014	DEER2021	Each	0	0	50.64
Standard Efficiency Equipment	Standard Efficiency Equipment	SWWH014	DEER2021	Each	36	0.503	3625.34
Standard Efficiency Equipment	Standard Efficiency Equipment	SWWH014	DEER2021	Each	3	0.4509	3445.5
Standard Efficiency Equipment	Standard Efficiency Equipment	SWWH014	DEER2021	Each	36	0.4979	3589.42
Standard Efficiency Equipment	Standard Efficiency Equipment	SWWH014	DEER2021	Each	3	0.4474	3408.34
Standard Efficiency Equipment	Standard Efficiency Equipment	SWWH014	DEER2021	Each	33	0.503	3625.34
Standard Efficiency Equipment	Standard Efficiency Equipment	SWWH014	DEER2021	Each	3	0.4509	3445.5
Standard Efficiency Equipment	Standard Efficiency Equipment	SWWH014	DEER2021	Each	33	0.4979	3589.42
Standard Efficiency Equipment	Standard Efficiency Equipment	SWWH014	DEER2021	Each	3	0.4474	3408.34
Standard Efficiency Equipment	Standard Efficiency Equipment	SWAP015	DEER2021	Each	5	0.0251	102
Standard Efficiency Equipment	Standard Efficiency Equipment	SWAP015	DEER2021	Each	1	0.0251	102
Standard Efficiency Equipment	Standard Efficiency Equipment	SWAP015	DEER2021	Each	5	0.0251	102
Standard Efficiency Equipment	Standard Efficiency Equipment	SWAP015	DEER2021	Each	0	0.0251	102

UnitTherm1stBaseline	UnitkW2ndBaseline	UnitkWh2ndBaseline	UnitTherm2ndBaseline	UnitMeaCost1stBaseline	UnitMeaCost2ndBaseline	UnitDirectInstallLab	UnitDirectInstallMat	UnitEndUserRebate	UnitIncentiveToOthers
-49	0	0	0	2034	0	0	0	1144.5	0
64	0	0	0	2034	0	0	0	1144.5	0
190	0	0	0	1750	0	0	0	1012.5	0
-49	0	0	0	2034	0	0	0	1144.5	0
64	0	0	0	2034	0	0	0	1144.5	0
190	0	0	0	1750	0	0	0	1012.5	0
0.00548	0	0	0	1.34	0	0.42	0.65	0	0
0.00244	0	0	0	1.34	0	0.42	0.65	0	0
84.13	0	91.52	84.4	616.53	450.55	172.92	680.745	0	0
90.29	0	432.34	90.59	616.53	450.55	172.92	680.745	0	0
84.13	0	91.52	84.4	616.53	450.55	172.92	680.745	0	0
90.29	0	432.34	90.59	616.53	450.55	172.92	680.745	0	0
12.467	0	0	0	1507.63	0	0	1206.1	0	0
12.4859	0	0	0	1507.63	0	0	1206.1	0	0
12.6391	0	0	0	1507.63	0	0	1206.1	0	0
12.6429	0	0	0	1507.63	0	0	1206.1	0	0
0	0	0	0	1627.46	0	286.66	1015.3	0	0
0	0	0	0	1627.46	0	286.66	1015.3	0	0
0	0	0	0	1627.46	0	286.66	1015.3	0	0
0	0	0	0	1627.46	0	286.66	1015.3	0	0
0	0	0	0	1627.46	0	286.66	1015.3	0	0
0	0	0	0	1627.46	0	286.66	1015.3	0	0
0	0	0	0	1627.46	0	286.66	1015.3	0	0
0	0	0	0	1627.46	0	286.66	1015.3	0	0
0	0	0	0	1808.52	0	129.7	1317.12	0	0
0	0	0	0	1808.52	0	129.7	1317.12	0	0
0	0	0	0	1808.52	0	129.7	1317.12	0	0
0	0	0	0	1808.52	0	129.7	1317.12	0	0

NTG_ID	NTGRkW	NTGRkWh	NTGRTherm	NTGRCost	EUL_ID	EUL_Yrs	RUL_ID	RUL_Yrs
NonRes-sAll-mCust-Elec	0.95	0.95	0.95	0.95	Nonres-RCx-Operational	10		0
NonRes-sAll-mCust-Elec	0.95	0.95	0.95	0.95	Nonres-RCx-Operational	7		0
NonRes-sAll-mCust-Elec	0.95	0.95	0.95	0.95	Nonres-RCx-Operational	13		0
NonRes-sAll-mCust-Elec	0.95	0.95	0.95	0.95	Nonres-RCx-Operational	10		0
NonRes-sAll-mCust-Elec	0.95	0.95	0.95	0.95	Nonres-RCx-Operational	7		0
NonRes-sAll-mCust-Elec	0.95	0.95	0.95	0.95	Nonres-RCx-Operational	13		0
Res-sSF-mShellIns	0.28	0.28	0.28	0.28	BS-CeilIns	6.7	BS-CeilIns	0
Res-sSF-mShellIns	0.28	0.28	0.28	0.28	BS-CeilIns	6.7	BS-CeilIns	0
FuelSubst-Default	1	1	1	1	HV-ResHP	15	HV-ResHP	5
FuelSubst-Default	1	1	1	1	HV-ResHP	15	HV-ResHP	5
FuelSubst-Default	1	1	1	1	HV-ResHP	15	HV-ResHP	5
FuelSubst-Default	1	1	1	1	HV-ResHP	15	HV-ResHP	5
FuelSubst-Default	1	1	1	1	Appl-EffCD	12	Appl-EffCD	0
FuelSubst-Default	1	1	1	1	Appl-EffCD	12	Appl-EffCD	0
FuelSubst-Default	1	1	1	1	Appl-EffCD	12	Appl-EffCD	0
FuelSubst-Default	1	1	1	1	Appl-EffCD	12	Appl-EffCD	0
Res-Default>2	0.55	0.55	0.55	0.55	WtrHt-HtPmp	10	WtrHt-HtPmp	0
Res-Default>2	0.55	0.55	0.55	0.55	WtrHt-HtPmp	10	WtrHt-HtPmp	0
Res-Default>2	0.55	0.55	0.55	0.55	WtrHt-HtPmp	10	WtrHt-HtPmp	0
Res-Default>2	0.55	0.55	0.55	0.55	WtrHt-HtPmp	10	WtrHt-HtPmp	0
Res-Default>2	0.55	0.55	0.55	0.55	WtrHt-HtPmp	10	WtrHt-HtPmp	0
Res-Default>2	0.55	0.55	0.55	0.55	WtrHt-HtPmp	10	WtrHt-HtPmp	0
Res-Default>2	0.55	0.55	0.55	0.55	WtrHt-HtPmp	10	WtrHt-HtPmp	0
Res-Default>2	0.55	0.55	0.55	0.55	WtrHt-HtPmp	10	WtrHt-HtPmp	0
All-Default<=2yrs	0.7	0.7	0.7	0.7	Appl-Elec_Cooking	16	Appl-Elec_Cooking	0
All-Default<=2yrs	0.7	0.7	0.7	0.7	Appl-Elec_Cooking	16	Appl-Elec_Cooking	0
All-Default<=2yrs	0.7	0.7	0.7	0.7	Appl-Elec_Cooking	16	Appl-Elec_Cooking	0
All-Default<=2yrs	0.7	0.7	0.7	0.7	Appl-Elec_Cooking	16	Appl-Elec_Cooking	0

GSIA_ID	RealizationRatekW	RealizationRatekWh	RealizationRateTherm	InstallationRatekW	InstallationRatekWh	InstallationRateTherm	Residential_Flag	Upstream_Flag	PA	UnitGasInfraBens	UnitRefrigCosts
	0.9	0.9	0.9	1	1	1	0	0	PGE	0	0
	0.9	0.9	0.9	1	1	1	0	0	PGE	0	0
	0.9	0.9	0.9	1	1	1	0	0	PGE	0	0
	0.9	0.9	0.9	1	1	1	0	0	PGE	0	0
	0.9	0.9	0.9	1	1	1	0	0	PGE	0	0
	0.9	0.9	0.9	1	1	1	0	0	PGE	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0
Def-GSIA	1	1	1	1	1	1	1	0	BAY	0	0

UnitRefrigBens	UnitMiscCosts	MiscCostsDesc	UnitMiscBens	MiscBensDesc	RateScheduleElec	RateScheduleGas	CombustionType	MeasInflation	Comments
0	0	0	0					0	
0	0	0	0					0	
0	0	0	0					0	
0	0	0	0					0	
0	0	0	0					0	
0	0	0	0					0	
0	0	0	0						
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0	0	0	0						
0	0	0	0						
0	0	0	0						
0	0	0	0						

First-Year Cost-Effectiveness Program Cost Inputs: Commercial P4P Program and LMI Residential Electrification Program

PrgID	PrgYear	ClaimYearQuarter	AdminCostsOverheadAndGA	AdminCostsOther	MarketingOutreach	DIActivity	DIInstallation	DIHardwareAndMaterials
EBCE-COM-001	2022	2022Q3	$ 233,169.91	$ -	$ 139,901.95	$ 466,339.82	$ -	$ -
EBCE-Res-001	2022	2022Q3	$ 99,929.96	$ -	$ 59,957.98	$ 199,859.93	$ -	$ -

DIRebateAndInspection	EMV	UserInputIncentive	OnBillFinancing	CostsRecoveredFromOtherSources	PA
$ -	$ 93,267.96	$ -	$ -	$ -	PGE
$ -	$ 39,971.99	$ -	$ -	$ -	BAY

First-Year Cost-Effectiveness Outputs: Commercial P4P Program and LMI Residential Electrification Program

JobID	PA	PrgID	CET_ID	GrossKWh	GrossKW	GrossThm	NetKWh	NetKW	NetThm
51309	BAY	EBCE-RES-001	EBCE-2022-CD1	1194.669	0	0	1194.669	0	0
51309	BAY	EBCE-RES-001	EBCE-2022-CD2	1295.901	0	0	1295.901	0	0
51309	BAY	EBCE-RES-001	EBCE-2022-CD3	2071.628	0	0	2071.628	0	0
51309	BAY	EBCE-RES-001	EBCE-2022-HP1	208634	0	0	208634	0	0
51309	BAY	EBCE-RES-001	EBCE-2022-HP2	13265.05	0	0	13265.05	0	0
51309	BAY	EBCE-RES-001	EBCE-2022-HP3	208634	0	0	208634	0	0
51309	BAY	EBCE-RES-001	EBCE-2022-HP4	13265.05	0	0	13265.05	0	0
51309	BAY	EBCE-RES-001	EBCE-2022-INCOOK4	0	0	0	0	0	0
51309	BAY	EBCE-RES-001	EBCE-2022-INCOOK3	510	0.1255	0	357	0.08785	0
51309	BAY	EBCE-RES-001	EBCE-2022-INCOOK2	102	0.0251	0	71.4	0.01757	0
51309	BAY	EBCE-RES-001	EBCE-2022-INCOOK1	510	0.1255	0	357	0.08785	0
51309	BAY	EBCE-RES-001	EBCE-2022-HPWH8	10225.02	1.3422	0	5623.761	0.73821	0
51309	BAY	EBCE-RES-001	EBCE-2022-HPWH7	118450.9	16.4307	0	65147.97	9.036885	0
51309	BAY	EBCE-RES-001	EBCE-2022-HPWH6	10336.5	1.3527	0	5685.075	0.743985	0
51309	BAY	EBCE-RES-001	EBCE-2022-HPWH5	119636.2	16.599	0	65799.92	9.12945	0
51309	BAY	EBCE-RES-001	EBCE-2022-HPWH4	10225.02	1.3422	0	5623.761	0.73821	0
51309	BAY	EBCE-RES-001	EBCE-2022-HPWH3	129219.1	17.9244	0	71070.52	9.85842	0
51309	BAY	EBCE-RES-001	EBCE-2022-HPWH2	10336.5	1.3527	0	5685.075	0.743985	0
51309	BAY	EBCE-RES-001	EBCE-2022-HPWH1	130512.2	18.108	0	71781.73	9.9594	0
51309	BAY	EBCE-RES-001	EBCE-2022-CI81	278.4825	0	23.49576	77.97511	0	6.578813
51309	BAY	EBCE-RES-001	EBCE-2022-CI1	9243.079	0	1002.614	2588.062	0	280.732
51309	BAY	EBCE-RES-001	EBCE-2022-CD4	0	0	0	0	0	0
51309	PGE	EBCE-COM-001	6	-16200	-1.849315	3078	-15390	-1.756849	2924.1
51309	PGE	EBCE-COM-001	5	209286	23.8911	6336	198821.7	22.69654	6019.2
51309	PGE	EBCE-COM-001	4	770761.8	87.98651	-6262.2	732223.7	83.58718	-5949.09
51309	PGE	EBCE-COM-001	3	-59400	-6.780822	11286	-56430	-6.441781	10721.7
51309	PGE	EBCE-COM-001	2	743916.6	84.92199	22521.6	706720.8	80.67589	21395.52
51309	PGE	EBCE-COM-001	1	2741090	312.9098	-22270.5	2604035	297.2643	-21156.98

LifecycleGrossKWh	LifecycleGrossThm	LifecycleNetKWh	LifecycleNetThm	GoalAttainmentKWh	GoalAttainmentKW	GoalAttainmentThm	FirstYearGrossKWh	FirstYearGrossKW	FirstYearGrossThm	FirstYearNetKWh	FirstYearNetKW
14336.03	0	14336.03	0	1194.669	0	0	1194.669	0	0	1194.669	0
15550.81	0	15550.81	0	1295.901	0	0	1295.901	0	0	1295.901	0
24859.54	0	24859.54	0	2071.628	0	0	2071.628	0	0	2071.628	0
3129510	0	3129510	0	208821.5	0	0	208821.5	0	0	208821.5	0
198975.7	0	198975.7	0	13373.62	0	0	13373.62	0	0	13373.62	0
3129510	0	3129510	0	208821.5	0	0	208821.5	0	0	208821.5	0
198975.7	0	198975.7	0	13373.62	0	0	13373.62	0	0	13373.62	0
0	0	0	0	0	0	0	0	0	0	0	0
8160	0	5712	0	510	0.1255	0	510	0.1255	0	357	0.08785
1632	0	1142.4	0	102	0.0251	0	102	0.0251	0	71.4	0.01757
8160	0	5712	0	510	0.1255	0	510	0.1255	0	357	0.08785
102250.2	0	56237.61	0	10225.02	1.3422	0	10225.02	1.3422	0	5623.761	0.73821
1184509	0	651479.7	0	118450.9	16.4307	0	118450.9	16.4307	0	65147.97	9.036885
103365	0	56850.75	0	10336.5	1.3527	0	10336.5	1.3527	0	5685.075	0.743985
1196362	0	657999.2	0	119636.2	16.599	0	119636.2	16.599	0	65799.92	9.12945
102250.2	0	56237.61	0	10225.02	1.3422	0	10225.02	1.3422	0	5623.761	0.73821
1292191	0	710705.2	0	129219.1	17.9244	0	129219.1	17.9244	0	71070.52	9.85842
103365	0	56850.75	0	10336.5	1.3527	0	10336.5	1.3527	0	5685.075	0.743985
1305122	0	717817.3	0	130512.2	18.108	0	130512.2	18.108	0	71781.73	9.9594
1865.833	157.4216	522.4332	44.07805	278.4825	0	23.49576	278.4825	0	23.49576	77.97511	0
61928.63	6717.515	17340.02	1880.904	9243.079	0	1002.614	9243.079	0	1002.614	2588.062	0
0	0	0	0	0	0	0	0	0	0	0	0
-210600	40014	-200070	38013.3	-16200	-1.849315	3078	-16200	-1.849315	3078	-15390	-1.756849
1465002	44352	1391752	42134.4	209286	23.8911	6336	209286	23.8911	6336	198821.7	22.69654
7707618	-62622	7322237	-59490.9	770761.8	87.98651	-6262.2	770761.8	87.98651	-6262.2	732223.7	83.58718
-772200	146718	-733590	139382.1	-59400	-6.780822	11286	-59400	-6.780822	11286	-56430	-6.441781
5207416	157651.2	4947045	149768.6	743916.6	84.92199	22521.6	743916.6	84.92199	22521.6	706720.8	80.67589
27410895	-222705	26040350	-211569.8	2741090	312.9098	-22270.5	2741090	312.9098	-22270.5	2604035	297.2643

FirstYearNetThm	WeightedSavings	ElecBen	GasBen	ElecBenGross	GasBenGross	TRCCost	PACCost	TRCCostGross
0	0.001161582	109.8938008	418.7807156	109.8938008	418.7807156	4775.99719	3905.08284	4640.43075
0	0.001259988	219.2533042	419.4155881	219.2533042	419.4155881	4863.68967	3992.77532	4699.9177
0	0.002014241	244.6532705	707.6029173	244.6532705	707.6029173	8016.70496	6565.18103	7772.52072
0	0.20304017	9982.194177	90498.21571	9982.194177	90498.21571	146943.22	146943.22	121177.326
0	0.013003002	2459.233898	5112.171416	2459.233898	5112.171416	9553.93457	9553.93457	7612.42153
0	0.20304017	9982.194177	90498.21571	9982.194177	90498.21571	146943.22	146943.22	121177.326
0	0.013003002	2459.233898	5112.171416	2459.233898	5112.171416	9553.93457	9553.93457	7612.42153
0	0	0	0	0	0	0	0	0
0	0.000495765	516.0478223	0	737.2111746	0	8595.03081	7376.20899	9104.66354
0	9.92E-05	102.5437647	0	146.4910924	0	1718.47536	1474.71099	1820.41831
0	0.000495765	516.0478223	0	737.2111746	0	8595.03081	7376.20899	9104.66354
0	0.009939617	5251.776473	0	9548.684495	0	8464.50804	7947.42701	9864.72246
0	0.115144635	61196.00793	0	111265.469	0	95841.3223	90153.431	111881.211
0	0.010047986	5309.034849	0	9652.790634	0	8510.157	7993.07597	9921.02495
0	0.116296909	61808.40787	0	112378.9234	0	96329.5552	90641.6639	112483.387
0	0.009939617	5251.776473	0	9548.684495	0	8464.50804	7947.42701	9864.72246
0	0.12561233	66759.28138	0	121380.5116	0	104554.17	98349.1975	122052.23
0	0.010047986	5309.034849	0	9652.790634	0	8510.157	7993.07597	9921.02495
0	0.126869356	67427.35404	0	122595.1892	0	105086.788	98881.8152	122709.15
6.578813	0.000940082	51.54659158	44.2873444	184.0949699	158.1690871	10697.1816	9996.29922	12608.15
280.732	0.037548646	1720.141889	1889.835472	6143.363889	6749.412399	204672.839	191356.073	243010.561
0	0	0	0	0	0	0	0	0
2924.1	0.015738164	-16507.953	35303.0004	-17376.79258	37161.05305	39752.3061	27141.0561	40416.0561
6019.2	0.068910118	121872.6793	42314.41281	128287.0308	44541.48717	260314.518	167361.768	265206.768
-5949.09	0.134472237	607386.4431	-57640.1685	639354.1507	-60673.86158	435912.871	315919.321	442228.321
10721.7	0.057706602	-60944.8202	129444.3348	-64152.44227	136257.1945	145758.456	99517.2056	148192.206
21395.52	0.244944148	435829.735	150408.5037	458768.1421	158324.7408	925963.447	595558.672	943353.172
-21156.98	0.47822873	2170372.994	-204987.9232	2284603.151	-215776.7612	1552855.24	1126117.62	1575315.12

TRCCostNoAdmin	PACCostNoAdmin	TRCRatio	PACRatio	TRCRatioNoAdmin	PACRatioNoAdmin	BillReducElec	BillReducGas	RIMCost	WeightedBenefits
4354.51401	3483.59965	0.11069406	0.13538113	0.121408386	0.151760986	0	0	3905.082839	0.001054446
4354.51401	3483.59965	0.13131366	0.15995613	0.146668237	0.183335904	0	0	3992.77532	0.001273831
7257.52334	5805.99942	0.11878399	0.14504645	0.131209525	0.16401245	0	0	6565.181034	0.001899284
66835.7017	66835.7017	0.68380433	0.68380433	1.503394253	1.503394253	0	0	146943.2198	0.200409152
3517.66851	3517.66851	0.79249081	0.79249081	2.152393066	2.152393066	0	0	9553.934571	0.015101241
66835.7017	66835.7017	0.68380433	0.68380433	1.503394253	1.503394253	0	0	146943.2198	0.200409152
3517.66851	3517.66851	0.79249081	0.79249081	2.152393066	2.152393066	0	0	9553.934571	0.015101241
0	0	0	0	0	0	0	0	0	0
8183.61419	6964.79237	0.06004025	0.06996112	0.063058669	0.074093784	0	0	7376.20899	0.001029262
1636.72284	1392.95847	0.05967136	0.06953482	0.062651881	0.073615809	0	0	1474.710992	0.000204525
8183.61419	6964.79237	0.06004025	0.06996112	0.063058669	0.074093784	0	0	7376.20899	0.001029262
4277.55479	3760.47376	0.62044675	0.66081468	1.227752006	1.396573093	0	0	7947.427009	0.010474719
47053.1027	41365.2114	0.63851381	0.67879844	1.300573277	1.479407596	0	0	90153.43104	0.122056031
4277.55479	3760.47376	0.62384687	0.66420423	1.241137779	1.411799466	0	0	7993.075971	0.010588921
47053.1027	41365.2114	0.64163493	0.68189843	1.313588358	1.494212306	0	0	90641.66391	0.123277469
4277.55479	3760.47376	0.62044675	0.66081468	1.227752006	1.396573093	0	0	7947.427009	0.010474719
51330.6575	45125.6851	0.63851381	0.67879844	1.300573277	1.479407596	0	0	98349.1975	0.133152034
4277.55479	3760.47376	0.62384687	0.66420423	1.241137779	1.411799466	0	0	7993.075971	0.010588921
51330.6575	45125.6851	0.64163493	0.68189843	1.313588358	1.494212306	0	0	98881.81518	0.134484511
10620.7785	9919.89608	0.0089588	0.00958694	0.00902325	0.00966078	0	0	9996.299218	0.000191142
201794.802	188478.036	0.01763779	0.01886524	0.017889348	0.019153305	0	0	191356.0727	0.007200135
0	0	0	0	0	0	0	0	0	0
30836.25	18225	0.47280395	0.69249507	0.60951145	1.031278324	-26946.42	0	194.6358849	0.009559613
218847.75	125895	0.63072584	0.98103106	0.750234316	1.304158959	213669.8	0	381031.557	0.044459819
282512.55	162519	1.26113797	1.74014768	1.945918065	3.382658487	1052041	0	1367960.42	0.164472681
113066.25	66825	0.46995225	0.68831831	0.605835204	1.025058206	-98803.54	0	713.6649114	0.035051913
777904.275	447499.5	0.63311164	0.9843501	0.753612311	1.310031047	759499	0	1355057.65	0.158746011
1004710.13	577972.5	1.26565891	1.74527513	1.95617126	3.400481979	3741414	0	4867531.388	0.587709964

WeightedElecAlloc	WeightedProgramCost	ElecSupplyCost	GasSupplyCost	ElecSupplyCostGross	GasSupplyCostGross	TotalSystemBenefit	TotalSystemBenefitGross	OtherBen	OtherCost	OtherBenGross
0.2078667	421.483187	0	0	0	0	528.6745164	528.6745164	0	0	0
0.3432973	509.175668	0	0	0	0	638.6688923	638.6688923	0	0	0
0.2569196	759.181614	0	0	0	0	952.2561878	952.2561878	0	0	0
0.0993447	80107.518	0	0	0	0	100480.4099	100480.4099	0	0	0
0.3248055	6036.26606	0	0	0	0	7571.405314	7571.405314	0	0	0
0.0993447	80107.518	0	0	0	0	100480.4099	100480.4099	0	0	0
0.3248055	6036.26606	0	0	0	0	7571.405314	7571.405314	0	0	0
0	0	0	0	0	0	0	0	0	0	0
1	411.416616	0	0	0	0	516.0478223	737.2111746	0	0	0
1	81.7525176	0	0	0	0	102.5437647	146.4910924	0	0	0
1	411.416616	0	0	0	0	516.0478223	737.2111746	0	0	0
1	4186.95325	0	0	0	0	5251.776473	9548.684495	0	0	0
1	48788.2197	0	0	0	0	61196.00793	111265.469	0	0	0
1	4232.60221	0	0	0	0	5309.034849	9652.790634	0	0	0
1	49276.4525	0	0	0	0	61808.40787	112378.9234	0	0	0
1	4186.95325	0	0	0	0	5251.776473	9548.684495	0	0	0
1	53223.5124	0	0	0	0	66759.28138	121380.5116	0	0	0
1	4232.60221	0	0	0	0	5309.034849	9652.790634	0	0	0
1	53756.13	0	0	0	0	67427.35404	122595.1892	0	0	0
0.5378741	76.4031393	0	0	0	0	95.83393598	342.2640571	0	0	0
0.4764966	2878.03689	0	0	0	0	3609.977361	12892.77629	0	0	0
0	0	0	0	0	0	0	0	0	0	0
0	8916.05607	0	0	0	0	18795.04745	19784.26047	0	0	0
0.7422793	41466.7678	0	0	0	0	164187.0921	172828.518	0	0	0
1	153400.321	0	0	0	0	549746.2746	578680.2891	0	0	0
0	32692.2056	0	0	0	0	68499.51463	72104.75224	0	0	0
0.7434345	148059.172	0	0	0	0	586238.2387	617092.8829	0	0	0
1	548145.118	0	0	0	0	1965385.071	2068826.39	0	0	0

OtherCost Gross	NetElecCO2	NetGasCO2	GrossElecCO2	GrossGasCO2	NetElecCO2Lifecycle	NetGasCO2Lifecycle	GrossElecCO2Lifecycle	GrossGasCO2 Lifecycle
0	0.026141329	0.21879585	0.026141329	0.21879585	0.367882708	2.6255502	0.367882708	2.6255502
0	0.052481059	0.219127545	0.052481059	0.219127545	0.738557483	2.62953054	0.738557483	2.62953054
0	0.058197656	0.369693675	0.058197656	0.369693675	0.819006232	4.4363241	0.819006232	4.4363241
0	2.192823892	40.02249186	2.192823892	40.02249186	37.85050886	601.6218273	37.85050886	601.6218273
0	0.537496536	2.26068102	0.537496536	2.26068102	9.370545697	33.9853293	9.370545697	33.9853293
0	2.192823892	40.02249186	2.192823892	40.02249186	37.85050886	601.6218273	37.85050886	601.6218273
0	0.537496536	2.26068102	0.537496536	2.26068102	9.370545697	33.9853293	9.370545697	33.9853293
0	0	0	0	0	0	0	0	0
0	0.094438924	0	0.134912748	0	1.849716103	0	2.642451576	0
0	0.018887785	0	0.02698255	0	0.369943221	0	0.528490315	0
0	0.094438924	0	0.134912748	0	1.849716103	0	2.642451576	0
0	1.487680491	0	2.704873621	0	17.03382431	0	30.97058966	0
0	17.23390601	0	31.33437456	0	197.3268648	0	358.7761178	0
0	1.503900178	0	2.73436396	0	17.21953845	0	31.30825172	0
0	17.40636894	0	31.64794353	0	199.3015518	0	362.3664578	0
0	1.487680491	0	2.704873621	0	17.03382431	0	30.97058966	0
0	18.80062474	0	34.18295407	0	215.2656707	0	391.3921285	0
0	1.503900178	0	2.73436396	0	17.21953845	0	31.30825172	0
0	18.98876612	0	34.52502931	0	217.4198747	0	395.3088631	0
0	0.021192832	0.038486056	0.075688685	0.137450198	0.15547699	0.257856572	0.555274964	0.920916329
0	0.703408595	1.642282099	2.512173553	5.86529321	5.160417054	11.00329006	18.43006091	39.29746451
0	0	0	0	0	0	0	0	0
0	-3.83441542	17.105985	-4.03622676	18.0063	-58.1853778	222.377805	-61.24776606	234.0819
0	49.05702767	35.21232	51.6389765	37.0656	370.0526741	246.48624	389.5291306	259.4592
0	179.8922817	-34.8021765	189.3602966	-36.63387	2052.656419	-348.021765	2160.690967	-366.3387
0	-14.0595232	62.721945	-14.79949812	66.0231	-213.346385	815.385285	-224.5751422	858.3003
0	174.3754347	125.163792	183.5530892	131.75136	1315.369051	876.146544	1384.599001	922.25952
0	639.7577625	-123.768304	673.4292237	-130.282425	7299.940081	-1237.68304	7684.147454	-1302.82425

NetElecNOx	NetGasNOx	GrossElecNOx	GrossGasNOx	NetElecNOxLifecycle	NetGasNOxLifecycle	GrossElecNOxLifecycle	GrossGasNOxLifecycle	NetPM10
0.015186954	0	0.015186954	0	0.182243449	0	0.182243449	0	0.006341951
0.03048917	0	0.03048917	0	0.365870044	0	0.365870044	0	0.012732035
0.03381026	0	0.03381026	0	0.40572312	0	0.40572312	0	0.014118896
1.335107818	0	1.335107818	0	18.51435365	0	18.51435365	0	0.541998485
0.327256479	0	0.327256479	0	4.580955566	0	4.580955566	0	0.132852578
1.335107818	0	1.335107818	0	18.51435365	0	18.51435365	0	0.541998485
0.327256479	0	0.327256479	0	4.580955566	0	4.580955566	0	0.132852578
0	0	0	0	0	0	0	0	0
0.054864831	0	0.07837833	0	0.877837296	0	1.25405328	0	0.022911118
0.010972966	0	0.015675666	0	0.175567459	0	0.250810656	0	0.004582224
0.054864831	0	0.07837833	0	0.877837296	0	1.25405328	0	0.022911118
0.864276462	0	1.571411749	0	8.642764618	0	15.71411749	0	0.360914985
10.01213593	0	18.20388352	0	100.1213593	0	182.0388352	0	4.180988434
0.873699381	0	1.58854433	0	8.736993812	0	15.8854433	0	0.364849921
10.11232926	0	18.3860532	0	101.1232926	0	183.860532	0	4.22282837
0.864276462	0	1.571411749	0	8.642764618	0	15.71411749	0	0.360914985
10.92233011	0	19.85878202	0	109.2233011	0	198.5878202	0	4.561078291
0.873699381	0	1.58854433	0	8.736993812	0	15.8854433	0	0.364849921
11.03163192	0	20.05751258	0	110.3163192	0	200.5751258	0	4.606721858
0.012373402	0	0.044190723	0	0.082901796	0	0.296077844	0	0.005034369
0.410684031	0	1.466728681	0	2.751583005	0	9.827082161	0	0.167095117
0	0	0	0	0	0	0	0	0
-2.2661775	0	-2.38545	0	-29.4603075	0	-31.01085	0	-0.944687448
28.11776246	0	29.59764469	0	196.8243372	0	207.1835128	0	11.86820409
106.7465013	0	112.3647383	0	1067.465013	0	1123.647383	0	44.94206076
-8.3093175	0	-8.74665	0	-108.0211275	0	-113.70645	0	-3.463853976
99.94586473	0	105.2061734	0	699.6210531	0	736.4432138	0	42.18607091
379.6266421	0	399.6069917	0	3796.266421	0	3996.069917	0	159.8291597

GrossPM10	NetPM10Lifecycle	GrossPM10Lifecycle	IncentiveToOthers	DILaborCost	DIMaterialCost	EndUserRebate	RebatesandIncents	GrossMeasureCost	ExcessIncentives
0.006341951	0.076103417	0.076103417	0	0	3618.3	0	3618.3	4522.89	0
0.012732035	0.152784424	0.152784424	0	0	3618.3	0	3618.3	4522.89	0
0.014118896	0.169426752	0.169426752	0	0	6030.5	0	6030.5	7538.15	0
0.541998485	7.516060871	7.516060871	0	14061.85	55358.18	0	69420.0378	36638.726	32781.31
0.132852578	1.859678254	1.859678254	0	740.0976	2913.589	0	3653.6862	1928.354	1725.332
0.541998485	7.516060871	7.516060871	0	14061.85	55358.18	0	69420.0378	36638.726	32781.31
0.132852578	1.859678254	1.859678254	0	740.0976	2913.589	0	3653.6862	1928.354	1725.332
0	0	0	0	0	0	0	0	0	0
0.032730168	0.366577882	0.523682688	0	648.5	6585.6	0	7234.1	9042.6	0
0.006546034	0.073315576	0.104736538	0	129.7	1317.12	0	1446.82	1808.52	0
0.032730168	0.366577882	0.523682688	0	648.5	6585.6	0	7234.1	9042.6	0
0.656209064	3.609149849	6.562090635	0	859.98	3045.9	0	3905.88	4882.38	0
7.601797152	41.80988434	76.01797152	0	9459.78	33504.9	0	42964.68	53706.18	0
0.663363493	3.648499213	6.633634932	0	859.98	3045.9	0	3905.88	4882.38	0
7.677869764	42.2282837	76.77869764	0	9459.78	33504.9	0	42964.68	53706.18	0
0.656209064	3.609149849	6.562090635	0	859.98	3045.9	0	3905.88	4882.38	0
8.29286962	45.61078291	82.9286962	0	10319.76	36550.8	0	46870.56	58588.56	0
0.663363493	3.648499213	6.633634932	0	859.98	3045.9	0	3905.88	4882.38	0
8.375857924	46.06721858	83.75857924	0	10319.76	36550.8	0	46870.56	58588.56	0
0.017979891	0.033730275	0.120465269	0	4044.352	6259.117	0	10303.4687	12903.4094	0
0.596768277	1.119537287	3.998347453	0	76842.7	118923.2	0	195765.916	245164.792	0
0	0	0	0	0	0	0	0	0	0
-0.99440784	-12.28093682	-12.92730192	0	0	0	18225	18225	31500	0
12.49284641	83.07742864	87.44992489	0	0	0	125895	125895	223740	0
47.30743238	449.4206076	473.0743238	0	0	0	162519	162519	288828	0
-3.64616208	-45.03010169	-47.40010704	0	0	0	66825	66825	115500	0
44.40639043	295.3024964	310.844733	0	0	0	447499.5	447499.5	795294	0
168.2412208	1598.291597	1682.412208	0	0	0	577972.5	577972.5	1027170	0

MarkEffectPlusExcessInc	GrossParticipantCost	GrossParticipantCostAdjusted	NetParticipantCost	NetParticipantCostAdjusted	RebatesandIncentivesPV	GrossMeasCostPV	ExcessIncentivesPV	MarkEffectPlusExcessIncPV	GrossParticipantCostPV
0	904.59	904.59	904.59	904.59	3483.599652	4354.514007	0	0	870.9143546
0	904.59	904.59	904.59	904.59	3483.599652	4354.514007	0	0	870.9143546
0	1507.65	1507.65	1507.65	1507.65	5805.99942	7257.523345	0	0	1451.523924
0	-32781.3118	0	0	0	66835.70172	39377.46179	27458.23994	0	-27458.23994
0	-1725.3322	0	0	0	3517.668512	2072.497989	1445.170523	0	-1445.170523
0	-32781.3118	0	0	0	66835.70172	39377.46179	27458.23994	0	-27458.23994
0	-1725.3322	0	0	0	3517.668512	2072.497989	1445.170523	0	-1445.170523
0	0	0	0	0	0	0	0	0	0
0	1808.5	1808.5	1265.95	1265.95	6964.792373	8705.966397	0	0	1741.174024
0	361.7	361.7	253.19	253.19	1392.958475	1741.193279	0	0	348.2348048
0	1808.5	1808.5	1265.95	1265.95	6964.792373	8705.966397	0	0	1741.174024
0	976.5	976.5	537.075	537.075	3760.473761	4700.621085	0	0	940.1473234
0	10741.5	10741.5	5907.825	5907.825	41365.21137	51706.83193	0	0	10341.62056
0	976.5	976.5	537.075	537.075	3760.473761	4700.621085	0	0	940.1473234
0	10741.5	10741.5	5907.825	5907.825	41365.21137	51706.83193	0	0	10341.62056
0	976.5	976.5	537.075	537.075	3760.473761	4700.621085	0	0	940.1473234
0	11718	11718	6444.9	6444.9	45125.68513	56407.45301	0	0	11281.76788
0	976.5	976.5	537.075	537.075	3760.473761	4700.621085	0	0	940.1473234
0	11718	11718	6444.9	6444.9	45125.68513	56407.45301	0	0	11281.76788
0	2599.9407	2599.9407	727.983396	727.983396	9919.896078	12423.04743	0	0	2503.151347
0	49398.876	49398.876	13831.68528	13831.68528	188478.0358	236037.914	0	0	47559.87819
0	0	0	0	0	0	0	0	0	0
0	13275	13275	12611.25	12611.25	18225	31500	0	0	13275
0	97845	97845	92952.75	92952.75	125895	223740	0	0	97845
0	126309	126309	119993.55	119993.55	162519	288828	0	0	126309
0	48675	48675	46241.25	46241.25	66825	115500	0	0	48675
0	347794.5	347794.5	330404.775	330404.775	447499.5	795294	0	0	347794.5
0	449197.5	449197.5	426737.625	426737.625	577972.5	1027170	0	0	449197.5

GrossParticipantCostAdjustedPV	NetParticipantCostPV	NetParticipantCostAdjustedPV	WtdAdminCostsOverheadAndGA	WtdAdminCostsOther	WtdMarketingOutreach	WtdDIActivity	WtdDIInstallation	WtdDIHardwareAndMaterials
870.9143546	870.9143546	870.9143546	105.370794	0	63.22247643	210.7415934	0	0
870.9143546	870.9143546	870.9143546	127.2939138	0	76.37634827	254.5878339	0	0
1451.523924	1451.523924	1451.523924	189.7953987	0	113.8772392	379.590807	0	0
0	0	0	20026.87901	0	12016.12741	40053.75902	0	0
0	0	0	1509.066477	0	905.4398863	3018.13303	0	0
0	0	0	20026.87901	0	12016.12741	40053.75902	0	0
0	0	0	1509.066477	0	905.4398863	3018.13303	0	0
0	0	0	0	0	0	0	0	0
1741.174024	1218.821817	1218.821817	102.8541515	0	61.71249089	205.7083081	0	0
348.2348048	243.7643634	243.7643634	20.4381289	0	12.26287734	40.87625882	0	0
1741.174024	1218.821817	1218.821817	102.8541515	0	61.71249089	205.7083081	0	0
940.1473234	517.0810279	517.0810279	1046.738286	0	628.0429715	2093.476624	0	0
10341.62056	5687.891307	5687.891307	12197.05461	0	7318.232767	24394.10983	0	0
940.1473234	517.0810279	517.0810279	1058.150526	0	634.8903156	2116.301105	0	0
10341.62056	5687.891307	5687.891307	12319.11283	0	7391.467696	24638.22627	0	0
940.1473234	517.0810279	517.0810279	1046.738286	0	628.0429715	2093.476624	0	0
11281.76788	6204.972335	6204.972335	13305.87776	0	7983.526655	26611.75618	0	0
940.1473234	517.0810279	517.0810279	1058.150526	0	634.8903156	2116.301105	0	0
11281.76788	6204.972335	6204.972335	13439.03218	0	8063.419305	26878.06502	0	0
2503.151347	700.8823771	700.8823771	19.10078435	0	11.46047061	38.20156966	0	0
47559.87819	13316.76589	13316.76589	719.509205	0	431.705523	1439.018446	0	0
0	0	0	0	0	0	0	0	0
13275	12611.25	12611.25	2229.014018	0	1337.408449	4458.028036	0	0
97845	92952.75	92952.75	10366.69195	0	6220.015345	20733.38389	0	0
126309	119993.55	119993.55	38350.08019	0	23010.04877	76700.16038	0	0
48675	46241.25	46241.25	8173.0514	0	4903.83098	16346.1028	0	0
347794.5	330404.775	330404.775	37014.793	0	22208.87644	74029.586	0	0
449197.5	426737.625	426737.625	137036.2794	0	82221.77002	274072.5589	0	0

WtdDIRebateAndInspection	WtdEMV	WtdUserInputIncentive	WtdCostsRecoveredFromOtherSources	ProgramCosts	TotalExpenditures	DiscountedSavingsGrosskWh	DiscountedSavingsNetkWh	DiscountedSavingsGrossThm
0	42.14832289	0	0	421.4831867	4039.783187	9498.575733	9498.575733	0
0	50.91757189	0	0	509.1756679	4127.475668	10303.44555	10303.44555	0
0	75.91816899	0	0	759.1816139	6789.681614	16471.09947	16471.09947	0
0	8010.752606	0	0	80107.51805	149527.5558	2732527.604	1890398.798	0
0	603.6266664	0	0	6036.26606	9689.95226	168388.3083	120360.0379	0
0	8010.752606	0	0	80107.51805	149527.5558	2732527.604	1890398.798	0
0	603.6266664	0	0	6036.26606	9689.95226	168388.3083	120360.0379	0
0	0	0	0	0	0	0	0	0
0	41.14166574	0	0	411.4166162	7645.516616	4782.515819	3347.761073	0
0	8.175252582	0	0	81.75251764	1528.572518	956.5031637	669.5522146	0
0	41.14166574	0	0	411.4166162	7645.516616	4782.515819	3347.761073	0
0	418.6953667	0	0	4186.953248	8092.833248	72220.07668	39721.04217	0
0	4878.822455	0	0	48788.21967	91752.89967	836627.2332	460144.9782	0
0	423.2602634	0	0	4232.60221	8138.48221	73007.46821	40154.10751	0
0	4927.645747	0	0	49276.45254	92241.13254	844999.519	464749.7355	0
0	418.6953667	0	0	4186.953248	8092.833248	72220.07668	39721.04217	0
0	5322.351769	0	0	53223.51236	100094.0724	912684.2544	501976.3399	0
0	423.2602634	0	0	4232.60221	8138.48221	73007.46821	40154.10751	0
0	5375.613543	0	0	53756.13005	100626.69	921817.6571	506999.7114	0
0	7.640314698	0	0	76.40313933	10379.87184	1470.140962	411.6394694	124.0367893
0	287.803718	0	0	2878.036892	198643.9529	48795.26224	13662.67343	5292.914431
0	0	0	0	0	0	0	0	0
0	891.605569	0	0	8916.056072	27141.05607	-140464.6953	-133441.4606	26688.29211
0	4146.6766	0	0	41466.76778	167361.7678	1186850.864	1127508.321	35931.15199
0	15340.03142	0	0	153400.3208	315919.3208	5654449.048	5371726.595	-45940.64058
0	3269.22042	0	0	32692.2056	99517.2056	-515037.2162	-489285.3554	97857.07108
0	14805.91657	0	0	148059.172	595558.672	4218715.345	4007779.577	127718.913
0	54814.50943	0	0	548145.1178	1126117.618	20109132.18	19103675.57	-163380.4471

DiscountedSavingsNetThm	TRCLifecycleNetBen	PACLifecycleNetBen	LevBenElec	LevBenGas	LevTRCCost	LevTRCCostNoAdmin	LevPACCost	LevPACCostNoAdmin
0	-4247.322677	-3376.408323	0.13986774	1.408291877	1.263552365	1.152043489	1.03314061	0.921631735
0	-4225.020783	-3354.106428	0.139000251	1.408291877	1.058536109	0.947718835	0.868989827	0.758172553
0	-7064.448771	-5612.924847	0.13986774	1.408291877	1.177496583	1.065987708	0.964296214	0.852787338
0	-46462.80988	-46462.80988	0.140034375	1.457630686	0.204787202	0.093145477	0.204787202	0.093145477
0	-1982.529257	-1982.529257	0.139724543	1.457643267	0.176310617	0.064915905	0.176310617	0.064915905
0	-46462.80988	-46462.80988	0.140034375	1.457630686	0.204787202	0.093145477	0.204787202	0.093145477
0	-1982.529257	-1982.529257	0.139724543	1.457643267	0.176310617	0.064915905	0.176310617	0.064915905
0	0	0	0	0	0	0	0	0
0	-8078.982984	-6860.161167	0.154147148	0	2.567396722	2.444503658	2.203325993	2.080432929
0	-1615.931591	-1372.167228	0.153152753	0	2.566603945	2.444503658	2.202533216	2.080432929
0	-8078.982984	-6860.161167	0.154147148	0	2.567396722	2.444503658	2.203325993	2.080432929
0	-3212.731565	-2695.650537	0.132216482	0	0.213098841	0.107689893	0.200081029	0.094672082
0	-34645.31442	-28957.42311	0.132992884	0	0.208285056	0.102257125	0.19592397	0.08989604
0	-3201.12215	-2684.041123	0.132216482	0	0.211937396	0.106528449	0.199059983	0.093651036
0	-34521.14735	-28833.25604	0.132992884	0	0.207271888	0.101243958	0.195033277	0.089005347
0	-3212.731565	-2695.650537	0.132216482	0	0.213098841	0.107689893	0.200081029	0.094672082
0	-37794.88845	-31589.91612	0.132992884	0	0.208285056	0.102257125	0.19592397	0.08989604
0	-3201.12215	-2684.041123	0.132216482	0	0.211937396	0.106528449	0.199059983	0.093651036
0	-37659.43347	-31454.46114	0.132992884	0	0.207271888	0.101243958	0.195033277	0.089005347
34.73030102	-10601.34766	-9900.465282	0.125222665	1.275178824	13.9776122	13.87777904	13.06179508	12.96196191
1482.016041	-201062.8612	-187746.0953	0.125900827	1.275178824	7.138127791	7.037753969	6.673695005	6.573321182
0	0	0	0	0	0	0	0	0
25353.87751	-20957.25863	-8346.008626	0.123709325	1.392410308	0	0	0	0
34134.59439	-96127.42568	-3174.675683	0.10809027	1.239634264	0.171374414	0.144075348	0.110180274	0.082881208
-43643.60855	113833.4039	233826.9539	0.11307099	1.320701253	0.081149489	0.052592504	0.058811504	0.030254518
92964.21753	-77258.94097	-31017.69097	0.124558848	1.392410308	0	0	0	0
121332.9673	-339725.2083	-9320.43328	0.108745934	1.239634264	0.171764231	0.144299573	0.110474855	0.083010196
-155211.4248	412529.8279	839267.4529	0.113610231	1.320701253	0.081285679	0.052592504	0.058947694	0.030254518

LevRIMCost	LevNetBenTRCElec	LevNetBenTRCElecNoAdmin	LevNetBenPACElec	LevNetBenPACElecNoAdmin	LevNetBenTRCGas	LevNetBenTRCGasNoAdmin	LevNetBenPACGas	LevNetBenPACGasNoAdmin	LevNetBenRIMElec	LevNetBenRIMGas
1.03314061	-1.123684624	-1.012175749	-0.89327287	-0.781763994	-11.31409	-10.19133	-8.994132	-7.871378	-0.893273	-8.994132
0.868989827	-0.919535858	-0.808718584	-0.729989577	-0.619172303	-9.316349	-8.193595	-7.395946	-6.273192	-0.72999	-7.395946
0.964296214	-1.037628843	-0.926119967	-0.824428473	-0.712919598	-10.44761	-9.324861	-8.300956	-7.178202	-0.824428	-8.300956
0.204787202	-0.064752827	0.046888898	-0.064752827	0.046888898	-0.674018	0.488071	-0.674018	0.488071	-0.064753	-0.674018
0.176310617	-0.036586074	0.074808638	-0.036586074	0.074808638	-0.381676	0.780423	-0.381676	0.780423	-0.036586	-0.381676
0.204787202	-0.064752827	0.046888898	-0.064752827	0.046888898	-0.674018	0.488071	-0.674018	0.488071	-0.064753	-0.674018
0.176310617	-0.036586074	0.074808638	-0.036586074	0.074808638	-0.381676	0.780423	-0.381676	0.780423	-0.036586	-0.381676
0	0	0	0	0	0	0	0	0	0	0
2.203325993	-2.413249574	-2.29035651	-2.049178844	-1.92628578	0	0	0	0	-2.049179	0
2.202533216	-2.413451193	-2.291350906	-2.049380463	-1.927280176	0	0	0	0	-2.04938	0
2.203325993	-2.413249574	-2.29035651	-2.049178844	-1.92628578	0	0	0	0	-2.049179	0
0.200081029	-0.080882358	0.024526589	-0.067864547	0.0375444	0	0	0	0	-0.067865	0
0.19592397	-0.075292171	0.030735759	-0.062931086	0.043096844	0	0	0	0	-0.062931	0
0.199059983	-0.079720914	0.025688034	-0.066843501	0.038565447	0	0	0	0	-0.066844	0
0.195033277	-0.074279004	0.031748927	-0.062040393	0.043987538	0	0	0	0	-0.06204	0
0.200081029	-0.080882358	0.024526589	-0.067864547	0.0375444	0	0	0	0	-0.067865	0
0.19592397	-0.075292171	0.030735759	-0.062931086	0.043096844	0	0	0	0	-0.062931	0
0.199059983	-0.079720914	0.025688034	-0.066843501	0.038565447	0	0	0	0	-0.066844	0
0.195033277	-0.074279004	0.031748927	-0.062040393	0.043987538	0	0	0	0	-0.06204	0
13.06179508	-13.85238953	-13.75255637	-12.93657241	-12.83673925	-141.0629	-140.0463	-131.7369	-130.7202	-12.93657	-131.7369
6.673695005	-7.012226964	-6.911853141	-6.547794177	-6.447420355	-71.02291	-70.00628	-66.31893	-65.3023	-6.547794	-66.31893
0	0	0	0	0	0	0	0	0	0	0
0	0.123709325	0.123709325	0.123709325	0.123709325	-0.175488	0.176176	0.321921	0.673585	0.123709	1.384734
0.250846784	-0.063284143	-0.035985078	-0.002090003	0.025209062	-0.725775	-0.412695	-0.023969	0.28911	-0.142757	-1.637204
0.254659353	0.0319215	0.060478486	0.054259486	0.082816472	1.320701	1.320701	1.320701	1.320701	-0.141588	1.320701
0	0.124558848	0.124558848	0.124558848	0.124558848	-0.175488	0.176176	0.321921	0.673585	0.124559	1.384734
0.251360284	-0.063018297	-0.035553638	-0.00172892	0.025735738	-0.718368	-0.405289	-0.019709	0.293371	-0.142614	-1.625713
0.254795543	0.032324552	0.061017727	0.054662537	0.083355713	1.320701	1.320701	1.320701	1.320701	-0.141185	1.320701

Appendix B: Funding Analysis

The table below presents 2021 forecasted EBCE load, non-bypassable surcharge per kWh, and total dollars collected through the surcharge. To calculate energy efficiency non-bypassable charge collections from EBCE's customers in 2021, EBCE used fee per kWh data and load data from PG&E, Calpine, and CAISO.

Table 1: EBCE Electric kWh by Rate Class (2021 Forecast)

Rate Class	Current Public Purpose Programs Charge (PPPC) ($/kWh)	Load Forecast Annual kWh	PPPC $
Residential	$0.01575	2,613,479,771.19	$ 41,162,306.40
LS	$0.00532	32,975,282.95	$ 175,428.51
TC	$0.00540	8,541,723.63	$ 46,125.31
A-1	$0.01607	906,395,518.55	$ 14,565,775.98
A-6	$0.01481	144,027,780.62	$ 2,133,051.43
A-10	$0.01492	1,044,940,275.56	$ 15,590,508.91
AG	$0.01421	39,424,097.79	$ 560,216.43
E-19S	$0.01453	1,082,456,347.38	$ 15,728,090.73
E-19P	$0.01400	64,221,462.04	$ 899,100.47
E-19T	$0.01400	418,324.46	$ 5,856.54
E-20S	$0.01421	170,959,565.63	$ 2,429,335.43
E-20P	$0.01365	379,350,384.73	$ 5,178,132.75
E-20T	$0.01274	31,059,735.32	$ 395,701.03
Annual PPPC Total		6,518,250,269.84	$ 98,869,629.91
Max Funding Available (Annual)			**$ 3,330,998.75**

PG&E 2021 Programs proposed for inclusion or to be determined for EBCE's ETA Funding Determination are listed in the following table. Included programs are based on PG&E 2021 filed Annual Budget Advice Letter and programs listed on CEDARS as of March 2021 as well as consultation with PG&E.

Table 2: PG&E Programs for EBCE ETA Funding Determination

CCA Funding Category	Status: Statewide; Regional; Other	Program Sector	Program ID	Program Name	2021 Budget ($)
Included	Other	Public	PGE2110051	Local Government Energy Action Resources (LGEAR)	3,041,724.05
Included	Other	Public	PGE_Pub_001	Central Coast Leaders in Energy Action Program	346,843.89
Included	Other	Public	PGE_Pub_002	Marin Energy Watch Partnership	278,310.80
Included	Other	Public	PGE_Pub_003	Redwood Coast Energy Watch	375,390.21

CCA Funding Category	Status: Statewide; Regional; Other	Program Sector	Program ID	Program Name	2021 Budget ($)
Included	Other	Public	PGE_Pub_004	Central California Energy Watch	801,965.02
Included	Other	Public	PGE_Pub_005	San Mateo County Energy Watch Program	449,256.94
Included	Other	Public	PGE_Pub_006	Energy Access SF	1,006,036.74
Included	Other	Public	PGE_Pub_007	Sierra Nevada Energy Watch	747,981.10
Included	Other	Public	PGE_Pub_008	Sonoma Public Energy	397,071.73

EBCE determined that 3.37% of PG&E's portfolio was tied to local programs. The noted 3% is associated with Government Partnership programs filed for in 2021. PG&E's 2021 Annual Budget Advice Letter shows that Government Partnerships are forecasted as 3.37% of the total budget. Based on this determination, EBCE's first-year not to exceed value is 3.37% of the total non-bypassable funds collected from EBCE customers for EE programs in 2021.

Table 3: 2021 PG&E ABAL Filing Budget

Primary Sector	State and Regional (S & R) / Local	2021 Filing Budget	% Of portfolio
Agricultural	S & R	$13,864,905.15	6%
Commercial	S & R	$54,752,092.29	25%
Cross-Cutting	S & R	$54,573,405.18	25%
Industrial	S & R	$31,732,548.39	14%
Institutional Partnerships	S & R	$4,758,824.77	2%
Government Partnerships	**Local**	**$7,444,580.48**	**3%**
Residential	S & R	$49,979,411.49	23%
Other	S & R	$3,861,867.73	2%
Total		**$220,967,635.48**	**100%**

EBCE has determined that our annual not to exceed dollar value for local programming is $3,330,998.75. See the table below where Annual PPPC $ Included equals EBCE load multiplied by the surcharge per kWh across rates less statewide and regional programming.

Table 4: Available Non-Bypassable Funding less S&R

Available Non-Bypassable Funding less S&R	
Total Dollar Value	98,869,629.91
Less S&R	$95,538,631.16
Annual Dollars Available to EBCE	**$ 3,330,998.75**