



November 30, 2017

California Public Utilities Commission
Energy Division Tariff Unit
505 Van Ness Ave.
Fourth Floor
San Francisco, CA 94102-3298

Advice Letter 8-E

(BayREN ID #941)

Subject

Supplemental: BayREN 2018 Annual Energy Efficiency Program and Portfolio Budget Request

Purpose

In response to a request dated October 30, 2017 from the Energy Division (ED)¹, the Association of Bay Area Governments, on behalf of the San Francisco Bay Area Regional Energy Network (BayREN) submits this supplement to the 2018 Energy Efficiency Annual Budget Advice Letter (AL). The ED requested that BayREN provide a new cost-effectiveness showing using the Cost Effectiveness Tool (CET) version 18.1 with the interim greenhouse gas (GHG) adder,² and address the 2018 goals as established in D.17-09-025. BayREN was also directed to provide additional portfolio scenarios to demonstrate possible approaches for improving overall cost-effectiveness.³

This supplement to AL8-E complies with ED's request. The alternative scenarios presented below are slight revisions to BayREN's current portfolio that would result in greater energy savings and cost-effectiveness and could be quickly implemented upon Commission approval. No increase in budget is requested. BayREN requests approval of the BayREN 2018 Energy Efficiency budget request, as submitted on September 1, 2017, together with the modifications to the portfolio as presented herein.

Discussion

1. BayREN 2018 Budget Request

There is no request to modify the total 2018 budget amount as presented in the September 1, 2017 Advice Letter.⁴ The alternative scenarios presented below would be funded through fund shifts within the portfolio.

¹ October 30, 2017 Letter from Robert Strauss re: Advice Letter BayREN 8-E.

² The GHG Adder was adopted in D.17-08-22, after the annual budget compliance date.

³ While ED asked for the supplemental filing by November 22, 2017, and extension was granted until November 30, 2017.

⁴ Since BayREN would shift funds between programs if the alternative scenarios are approved, these shifts were included in the Budget Filing Appendix, Tables 1-7. (See Attachment 1, viewable at <https://mtcdrive.app.box.com/v/BayREN-AL-8-2018-Attachments>.)



2. Goals

The 2018 Potential and Goals Study, approved in D.17-09-025, provided targets based on the service territories of the Investor Owned Utilities (IOU). BayREN serves ratepayers in a very small part of PG&E's large service area⁵ thereby making the goals from the Study difficult to apply. D. 17-09-025 recognizes "that the Potential Study should be useful for all program administrators, and BayREN's request [that the study needs to be more granular and should provide similar analysis for each of the program administrators] is within the scope of the potential study process" [D. 17-09-025 page 29]. Accordingly, BayREN does not address the goals from the Study at this time and looks forward to working with the Commission and stakeholders on future Goals and Potentials Studies that break down the service territories by both IOU and non-IOU program administrators.

3. Scenarios

While the RENs are not subject to the same cost-effectiveness test that the IOUs are because of the limitations on the programs that can be offered, (i.e. implementing those programs that are the most difficult, both in design and implementation, programs that the IOUs do not want to offer for these reasons, and serving hard to reach markets), BayREN has an eye towards cost effectiveness and presents three scenarios for consideration. However, it bears repeating that the Commission has recognized that it is not realistic to expect REN programs to be cost-effective within the traditional IOU definition.⁶ With these restrictions, and far smaller portfolios, RENs do not have the advantage of using high savings programs (such as primary lighting or large commercial) to balance residential and small commercial activities that typically and historically have low cost effectiveness. As articulated in D.12-11-015, "it becomes the responsibility of the Commission to approve a portfolio, including both utility and REN proposals that is cost-effective overall."⁷

BayREN provides the following scenarios that we believe will enable our portfolio to be more cost-effective in 2018 and in future years. With Commission approval, BayREN can move forward towards implementation of each scenario by shifting funds within our current budget.

⁵ Specifically, BayREN implements programs in only nine of the 47 counties in PG&E's territory.

⁶ D.12-11-015, at page 19.

⁷ D. 12-11-015, at pages 17-18.



Scenario 1 (Baseline): Existing Portfolio with interim GHG adder using CET v18.1.

This baseline scenario reflects a continuation of the original programs approved in D.14-10-046 from the 2013-2014 Energy Efficiency cycle (with slight modifications, as detailed in BayREN’s Advice Letter 8-E) using the CET v18.1 which incorporates the interim GHG adder.⁸ Table 1 and 2 outline the TRC and Program Administrator Cost (PAC) values and the Goal Attainment Savings values attributed to the 2018 BayREN baseline scenario. The budget for the baseline scenario is unchanged.

Table 1: Scenario 1 TRC and PAC

Program	TRC	PAC
Single Family	0.22	0.37
Multifamily	0.32	0.53
Resource Programs	0.26	0.44
Portfolio	0.23	0.36

Table 2: Scenario 1 Goal Attainment Savings (Gross and Net)

Program	Gross kWh	Gross kW	Gross Therms	Net kWh	Net kW	Net Therms
Single Family	815,474	1,164	195,399	611,606	873	146,549
Multifamily	1,962,967	194	142,856	1,766,670	174	128,570
Resource Programs	2,778,441	1,358	338,255	2,378,276	1,047	275,120

⁸ See Attachment 2, Scenario 1 CET Output File, viewable at <https://mtcdrive.app.box.com/v/BayREN-AL-8-2018-Attachments>.



Scenario 2: Update the existing portfolio using CET v18.1 with the GHG adder and include minor adjustments to cost-effectiveness inputs for programs that align with the goals set forth in the Business Plan.

Building on the baseline scenario above, BayREN proposes making the following adjustments to the portfolio, resulting in a TRC of 0.27 and a PAC of 0.48.⁹

Single Family

The proposed adjustments to this program optimize the eligible measures and rebates for certain climate zones, based on an analysis of completed project data. Specifically, we propose eliminating AC measures in Climate Zones 2 and 3. In Climate Zone 12, we propose removing insulation measures. New eligible measures will be added to the program, including pool heaters and pumps, LEDs, smart thermostats, and other cost-effective measures currently available in DEER thereby making these program adjustments easy to implement. By eliminating the least cost-effective measures which have a high measure cost per MMBtu, program cost-effectiveness will increase. These adjustments are the result of analysis of completed projects since 2013. For example, Climate Zone 12 has 2,338 paid projects. 14% of those (328 projects) contain an attic insulation measure resulting in negative savings. In Climate Zone 2 & 3 there are 1,187 and 1,074 paid projects, respectively. Of those projects, 54% and 21% contain an AC measure driving down the cost effectiveness of the entire project. This approach aligns with intervention strategy S2 of BayREN's Business Plan, specifically tactic R5¹⁰ to deploy budget-optimized energy efficiency packages that are affordable, achieve savings, and customer satisfaction.

BayREN also proposes to introduce single measure, stand-alone incentives for cost effective measures in select climate zones. The proposed measures include duct sealing, building air sealing, and furnace replacement measures. Introducing a single measure incentive reduces the average incremental measure cost while addressing multiple intervention strategies and objectives identified in BayREN's Business Plan.¹¹

- R3 – Facilitate access to complimentary services, support customer journey, and reduce up-front barriers to deeper savings
- R4 – Improved overall program accessibility
- R5 – Budget-optimized packages that are affordable for the customer & drive savings

This strategy also “softens” the impact of limiting AC measures in specific climate zones while directly furthering BayREN's objective of improving program accessibility for moderate income customers and supporting a long-term customer journey.

Codes and Standards: North Bay Fire Recovery Assistance

The unprecedented wildfires in October 2017 destroyed over 4,300 homes and damaged over 8,900 more in Sonoma and Napa Counties. The local jurisdictions have already taken many measures to streamline and accelerate the reconstruction process to permanently rehouse residents as quickly as

⁹ See Attachment 3, Scenario 2 CET Output File, viewable at <https://mtcdrive.app.box.com/v/BayREN-AL-8-2018-Attachments>.

¹⁰ BayREN Energy Efficiency Business Plan 2018-2025, at pages 2.32-2.33.

¹¹ BayREN Energy Efficiency Business Plan 2018-2025, at pages 2.29-2.33.



possible including urgency ordinances, reduced or waived permitting fees, and contracting for expanded planning, building, and permitting capacity. However, due to the heightened focus on accelerated building timelines and the rapid onboarding of new staff, energy code compliance for these reconstruction efforts will be even more challenging than in a standard environment.

BayREN proposes to reallocate \$100,000 from Single Family incentives to the Codes and Standards (C&S) program to provide dedicated energy code compliance support to communities impacted by the fire. Consistent with local municipal needs and priorities in Sonoma and Napa Counties, BayREN proposes to continue early collaboration with the Statewide Codes and Standards team to provide a range of expertise and resources specifically focused on enhancing compliance with the California Energy Efficiency Standards. Many of these resources are readily available from existing BayREN and EnergyCodeAce activities; others will be refined and/or customized upon request.

The scope of BayREN fire recovery support will depend on the needs of local jurisdictions and will be deployed to align with local responses such as the City of Santa Rosa's disaster recovery-centered permitting office. New activities proposed to supplement existing C&S initiatives include:

- In-person expert assistance with energy code requirements and interpretations
- In-person expert assistance to understand opportunities for reach codes
- In coordination with the BayREN Single Family team, provide training to contractors working in the impacted counties about green building and energy efficiency

BayREN proposes these activities to ensure reconstruction efforts achieve energy code compliance for 4,300 new residential homes. These resources are desperately needed and both local staff and elected officials have requested this support from BayREN. While these activities are not proposed as a true resource program, we believe they offer a path to developing a large, robust, and geographically concentrated data set on new construction projects. BayREN will work with the participating jurisdictions and the CalCERTS and CHEERS HERS registries to track projects and build this data set, which BayREN and partners, including the EnergyCodeAce team and the CPUC, can use to evaluate potential opportunities for energy savings claims and cost-effectiveness calculations for code compliance work.

Commercial: Small and Medium Commercial Pay for Performance Pilot Program

BayREN proposes to shift \$100,000 Single Family incentives to support near term development of the Small and Medium Commercial Business Pay-for-performance (SMCB P4P) sub-program, starting in 2018. BayREN will develop the P4P framework and initiate very limited, targeted activities.

The Commercial Sector of the BayREN business plan lays out the path for BayREN to deliver a cost-effective, high-impact P4P program that targets the SMCB sector and will pilot the use of normalized metered energy consumption (NMEC) to determine savings and incentive payments.¹² Leveraging the foundation established in other local government programs, continued efforts toward this program in 2018 would allow for quicker implementation. The P4P program is designed to be cost-effective because:

¹² See BayREN Energy Efficiency Business Plan 2018-2025, at pages 3.1-3.34.



1. It seeks to true-up financial incentives using metered data. Measurement and verification are built-in, not ex ante
2. It leverages rebates from existing utility programs, such as 3rd Party Direct Install, Core (utility catalogue rebate program), Mid-stream (distributor rebate program), and “Trade-Pros (equipment manufacturers rebate program)”
3. It integrates a diverse set of financing tools, from On Bill Financing (OBF), Commercial Property Assessed Clean Energy (PACE), private financing, and CHEEF pilots, depending on project scope
4. It reduces implementation costs by applying the industry-recognized Investor Confidence Project (ICP) protocols to applicable projects, and partners with ICP-practitioners (now being deployed under PG&E’s on-bill financing program)
5. The implementation relies on open-source data from the Bay Area Regional Integrated Commercial Retrofits (BRICR) software (U.S. DOE-funded mass energy modeling and simulation tool for Bay Area small commercial facilities) to objectively estimate savings and to generate proposals
6. Any market-actor incentives will be made based on performance (measured savings)

Multifamily

BayREN does not propose making any fundamental changes to the multifamily program¹³. Key objectives of the program’s design are to: 1) serve the multifamily sector’s diverse and unique needs through flexibility and customization, and 2) support state and local government goals of achieving deeper energy savings. The program allows participants to select their own measures and contractors, emphasizing market choice. Multifamily property owners have responded positively to the program, (to date over 22,000 units have been upgraded and Technical Assistance has been provided to over 95,000 units), which is reflected in their willingness to invest their own capital in energy efficiency. Because the rebate amount is fixed (on a per-unit basis), higher project costs mean more private capital is being leveraged by each ratepayer dollar. While this leads to greater energy savings overall, the higher participant costs result in lower TRC.

BayREN explored several scenarios and found that in order to increase TRC, eligible measure mix would have to be restricted. Specifically, the program would be limited to lighting and central Domestic Hot Water (DHW). An analysis of past projects showed that scope containing a combination of lighting and central DHW were the most cost effective from the participant cost perspective. Under this scenario, the TRC could increase to 0.9¹⁴. However, this change would have negative impacts on program effectiveness. Limiting the measure mix to this combination would disqualify as much as two-thirds of the multifamily market (based on an analysis of participants entering the program to date), as only properties with inefficient central DHW systems, non-low-flow water fixtures, and substantial common area and exterior lighting loads would be eligible. Savings in space heating and cooling would be completely missed. Most utility bill savings would accrue to property owners; multifamily tenants, a typically underserved population, would not directly benefit from cost savings. Pursuing highly cost effective measures first and in isolation misses the opportunity to bundle deeper savings and leave

¹³ Multifamily made minor revisions to the original 2018 cost-effectiveness inputs by recategorizing pre-installation Technical Assistance budget and updating project costs to reflect actual project costs collected over the past program years which resulted in a slightly higher TRC/PAC.

¹⁴ BayREN performed analysis on past project data and calculated TRC using the Desktop CET but is not providing the output files and is only showing the TRC for reference.



significant savings potential stranded and more difficult to subsequently incentivize. Because limiting the eligible measure mix would be contrary to the BayREN multifamily program’s long-term objectives¹⁵, BayREN does **not** present this as an alternative scenario.

BayREN requests approval to move forward with these minor program modifications and believes that greater cost-effectiveness will be one of several positive results.

Table 3: Scenario 2 TRC and PAC

Program	TRC	PAC
Single Family	0.27	0.65
Multifamily	0.39	0.54
Resource Programs	0.31	0.60
Portfolio	0.27	0.48

Table 4: Scenario 2 Goal Attainment Savings (Gross and Net)

Program	Gross kWh	Gross kW	Gross Therms	Net kWh	Net kW	Net Therms
Single Family	909,496	1,296	219,713	682,122	972	164,784
Multifamily	2,044,539	203	142,847	1,840,085	183	128,562
Resource Programs	2,954,035	1,500	362,560	2,522,207	1,155	293,347

Table 5: Scenario 2 Budget

Program	2018 Budget (\$)	Budget Shift	Supplemental AL Budget (\$)
Single Family	\$ 7,173,249	(\$ 200,000)	\$ 6,973,249
Multifamily	\$ 6,476,600	N/A	\$ 6,476,600
Codes & Standards	\$ 1,274,500	\$ 100,000	\$ 1,374,500
Financing	\$ 1,612,651	\$ 100,000	\$ 1,712,651
PA Program Total	\$ 16,537,000	N/A	\$ 16,537,000
EM&V	\$ 189,486	N/A	\$ 189,486
Subtotal	\$16,726,486	N/A	\$ 16,726,486

¹⁵ BayREN’s multifamily whole building program has been evaluated and compared with similar programs implemented by the IOUs and the results are illustrative. The multifamily whole building impact evaluations for the IOUs (PY 2015) and the RENs (PY 2013-2015) revealed significant differences between BayREN and the IOU programs. BayREN had higher participation, delivered greater energy savings, and had higher evaluated realization rates and net-of-free-rider (NFR) values. BayREN served over three times as many projects and nearly twice as many units as all of the IOUs combined (on an annualized basis) and delivered closer to its energy savings goals (97% by btu) compared to the IOUs (20% by btu). BayREN’s ex-post savings were much closer to ex-ante savings compared to the IOUs. The reports conclude that BayREN’s program cost \$798 to save one MMBTU compared to the IOUs program which cost \$3,194 to save one MMBTU (ex-post savings). BayREN still continues to look for ways to make the multifamily more cost-effective and achieve greater energy savings.



Scenario 3: High level of support for targeted clusters of single family residents and increased code compliance for non-residential lighting projects.

This scenario slightly modifies Scenario 2 by revising the single family approach to increasing cost-effectiveness changes; it also introduces potential savings through the CodeCycle platform.¹⁶

Single Family

Scenario 3 focuses on targeting high-potential, high-impact customers in clusters of neighborhoods which contain favorable (pre-1978) building vintages and clustering projects to reduce overall cost. Using assessors and other publicly available data, BayREN will identify high-potential neighborhoods. These residents will be offered a reduced cost for high-saving measures using standardized pricing, resulting in lower average project costs and increased average energy savings. For these projects, BayREN will leverage a separate existing work paper that mirrors the current work paper while adjusting measure costs based on standardized pricing agreements with 3rd party contractors. Scenario 3 also aligns with the goals identified in the BayREN business plan, specifically reducing up-front barriers to deeper savings (R3)¹⁷ and creating budget optimized packages that are affordable for the customer and drive savings (R5)¹⁸.

Codes and Standards: CodeCycle for Non-Residential Lighting

BayREN will increase the budget for current activities that fall under the Program Implementation Plan category of Enhanced Compliance Understanding and Enforcement, Code Enforcement Education and Training, and Policy Support and Advocacy. While these activities are proposed to continue as non-resource into 2018, they do help deliver energy savings generally forecast to accrue from PG&E Codes & Standards Title 24 and Title 20 Advocacy. BayREN is actively seeking to engage with Energy Division to understand how energy savings could be measured for certain Enhanced Compliance Enforcement activities.

Since 2015, BayREN has conducted demonstration projects in partner jurisdictions to test electronic design, plan check, and inspection software that assist building professionals and building department staff to evaluate energy code requirements and compliance. Current efforts are focused specifically on helping non-residential lighting projects meet code through use of the CodeCycle product. BayREN believes that this intervention is helping to increase code compliance. Preliminary findings, which BayREN has not yet been able to vet with Energy Division, indicate that the CodeCycle intervention could deliver a TRC of 1.69 and a PAC of 2.72. BayREN will continue to work with ED on how to claim savings from these activities and is interested in potentially increasing the funds allocated to this work if a viable path to savings can be established.

¹⁶ See Attachment 4, Scenario 3 CET Output File, viewable at <https://mtcdrive.app.box.com/v/BayREN-AL-8-2018-Attachments>.

¹⁷ BayREN Energy Efficiency Business Plan 2018-2025, at pages 2.29-2.30.

¹⁸ BayREN Energy Efficiency Business Plan 2018-2025, at pages 2.32-2.33.



Table 6: Scenario 3 TRC and PAC

Program	TRC	PAC
Single Family	0.33	0.84
Multifamily	0.39	0.54
Resource Programs	0.35	0.70
CodeCycle	1.69	2.72
Portfolio	0.32	0.57

Table 7: Scenario 3 Goal Attainment Savings (Gross and Net)

Program	Gross kWh	Gross kW	Gross Therms	Net kWh	Net kW	Net Therms
Single Family	1,068,279	1,523	315,100	801,209	1,142	236,325
Multifamily	2,044,539	203	142,847	1,840,085	183	128,562
CodeCycle	310,833	3,108	-558	279,750	2,797	-502
Portfolio	3,423,651	4,835	457,389	2,921,044	4,123	364,385

4. Conclusion

The Program Administrators were directed to file a “status quo” Energy Efficiency Budget Advice Letter for 2018 as a placeholder pending a decision on the business plans, with the understanding that there would be an opportunity to true-up the AL following the Decision. The alternative scenarios provided herein will result in greater portfolio cost-effectiveness showing than what was presented in the September filing. BayREN believes Scenario 2 provides the best approach for meeting long-term cost-effectiveness goals and recommends the ED approve this Scenario. BayREN includes as Attachment 5 to this Supplemental AL the updated “CEDARS Filing Confirmation” which reflects the 2018 BayREN Scenario 2. Alternatively, BayREN requests approval of Scenario 3 which similarly can begin implementation immediately.

Protests

Anyone may protest this Advice Letter. The protest must state the grounds upon which it is based. The protest must be made in writing and received by the Commission within 20 days of the date this Advice Letter was filed with the Commission, or November 30, 2017. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

Public Utilities Commission
 CPUC Energy Division
 Attention: Tariff Unit
 505 Van Ness Avenue
 San Francisco, CA 94102



Copies of the protest should also be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. It is also requested that a copy of the protest be sent by email to address shown below on the same date it is mailed or delivered to the Commission.

Gerald Lahr
Assistant Director - Energy Programs
Metropolitan Transportation Commission
375 Beale Street
7th Floor
San Francisco, CA 94105
JLahr@bayareametro.gov

Effective Date

BayREN requests that this Tier 2 advice filing become effective on regular notice, January 1, 2018.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.13-11-005 and A.17-01-013, et. al. Address changes to the General Order 96-B service list should be directed to Jennifer K. Berg at jberg@bayareametro.gov or by calling 415-820-7947.

Gerald L. Lahr
Assistant Director – Energy Programs

Attachment:

Attachment 5: BayREN CEDARS Filing Submission Receipt

Cc: Service List R.13-11-005
Service List A.17-01-013, et. al.

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Attachment 1
BayREN Budget Filing Appendix
(Tables 1-7)

Viewable at: <https://mtcdrive.box.com/v/BayREN-AL-8-2018-Attachments>

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Attachment 2

BayREN Scenario 1 CET Output File

Viewable at: <https://mtcdrive.box.com/v/BayREN-AL-8-2018-Attachments>

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Attachment 3

BayREN Scenario 2 CET Output File

Viewable at: <https://mtcdrive.box.com/v/BayREN-AL-8-2018-Attachments>

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Attachment 4

BayREN Scenario 3 CET Output File

Viewable at: <https://mtcdrive.box.com/v/BayREN-AL-8-2018-Attachments>

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**Attachment 5
BayREN CEDARS Filing Submission
Receipt**

CEDARS FILING SUBMISSION RECEIPT

The BAY portfolio filing has been submitted and is now under review. A summary of the filing is provided below.

PA: Bay Area Regional Energy Network (BAY)

Filing Year: 2018

Submitted: 12:48:35 on 22 Nov 2017

By: Qua Vallery

Advice Letter Number: 8-E-Supplemental

* Portfolio Filing Summary *

- TRC: 0.2731
- PAC: 0.4791
- TRC (no admin): 0.3702
- PAC (no admin): 0.887
- RIM: 0.4791
- Budget: \$16,726,485.67

* Programs Included in the Filing *

- BAYREN01: Single Family
- BAYREN02: Multi Family
- BAYREN03: Codes and Standards Program
- BAYREN04: Financing
- BAYREN05: Evaluation Measurement and Verification

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

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

Company name/CPUC Utility No. BayREN/#941

Utility type: REN

ELC GAS

PLC HEAT WATER

Contact Person: Jennifer Berg

Phone #: (415) 820-7947

E-mail: jberg@bayareametro.gov

EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

Tier: 1 2 3

Advice Letter (AL) #:8-E

Subject of AL: Supplemental: BayREN 2018 Annual Energy Efficiency Program and Portfolio Budget Request

Keywords (choose from CPUC listing): Compliance, Energy Efficiency

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.15.10.028

Does AL replace a withdrawn or rejected AL? No. If so, identify the prior AL No

Summarize differences between the AL and the prior withdrawn or rejected AL¹:N/A

Resolution Required? No

Requested effective date: January 1, 2018

No. of Tariff Sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

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

**CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Ave., 4th Flr.
San Francisco, CA 94102
EDTariffUnit@cpuc.ca.gov**

**Bay Area Regional Energy Network
Attn: Jennifer Berg
375 Beale Street, 7th Floor
San Francisco, CA 94105
jberg@bayareametro.gov**

¹ Discuss in AL if more space is needed.