

Measured Savings Program for Summer Reliability

**Implementation Plan**

PGE\_Com\_006

August 12, 2024

Version 1.2

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PG&E Measured Savings Program for Summer Reliability

# Program Overview

## Program Budget and Savings

1. **Program and/or Sub-Program Name:**

Program: Measured Savings Program for Summer Reliability (MSSR)

Subprograms: Commercial and Residential[[1]](#footnote-2)

1. **Program / Sub-Program ID number:**

Com\_006

1. **Program / Sub-program Budget Table:**

**Commercial Subprogram**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Costs ($)** | **2024** | **2025** | **2026** | **2027** | **2028** | **Program Total** |
| Administration | $43,309 | $14,052 | $14,052 | $12,292 | $3,135 | $86,840 |
| Marketing, Education, and Outreach | $85,375 | $89,229 | $84,466 | $25,944 | $0 | $285,014 |
| Implementation (Direct Implementation Non-Incentive) | $770,799 | $2,055,867 | $2,065,660 | $1,214,664 | $156,254 | $6,263,244 |
| Incentives[[2]](#footnote-3) | $3,330,710 | $7,267,526 | $7,857,518 | $3,909,048 | $0 | $22,364,802 |
| Total | $4,230,193 | $9,426,674 | $10,021,696 | $5,161,948 | $159,389 | $28,999,900 |

**Residential Subprogram**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Costs ($)** | **2024** | **2025** | **2026** | **2027** | **2028** | **Program Total** |
| Administration | $10,160 | $9,137 | $387 | $328 | $105 | $20,117 |
| Marketing, Education, and Outreach | $7,166 | $7,224 | $2,690 | $727 | $0 | $17,807 |
| Implementation (Direct Implementation Non-Incentive) | $94,776 | $140,538 | $71,490 | $49,893 | $5,236 | $361,933 |
| Incentives | $52,997 | $193,847 | $210,947 | $142,452 | $0 | $600,243 |
| Total | $165,099 | $350,746 | $285,514 | $193,400 | $5,341 | $1,000,100 |

1. **Program / Sub-program Impacts Table:**

**Commercial Sub-Program**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Year** | **2024** | **2025** | **2026** | **2027** | **2028** | **Program Total** |
| Lifecycle Summer Peak kW Savings (kW)[[3]](#footnote-4) (Net) | 776 | 67,708 | 59,341 | 44,679 | - | 172,504 |
| Program TSB ($) | $9,571,005 | $20,883,700 | $22,579,073 | $11,232,897 | - | $64,266,675 |
| Annual kWh Savings (Net) | 12,484,905 | 27,050,628 | 29,131,446 | 14,565,723 | - | 83,232,702 |
| Annual Therm Savings (Net) | 101,641 | 220,222 | 237,163 | 118,581 | - | 677,607 |

**Residential Sub-Program**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Year** | **2024** | **2025** | **2026** | **2027** | **2028** | **Program Total** |
| Lifecycle Summer Peak kW Savings (kW) (Net) |  -  |  889  |  1,109  |  967  |  -  |  2,965  |
| Program TSB ($) |  $198,489  |  $726,019  |  $790,067  |  $533,530  |  -  |  $2,248,105  |
| Annual kWh Savings (Net) |  172,125  |  621,563  |  669,375  |  449,438  |  -  |  1,912,501  |
| Annual Therm Savings (Net) | 4,808 | 17,363 | 18,699 | 12,555 | - |  53,425  |

1. **Program / Sub-Program Cost-Effectiveness (TRC, PAC, and TRCNoAdmin):**

**Commercial Sub-Program**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Year** | **2024** | **2025** | **2026** | **2027** | **2028** | **Program Total** |
| TRC Ratio | 1.22 | 1.21 | 1.23 | 1.20 | 0.00 | 1.21 |
| PAC Ratio | 2.35 | 2.30 | 2.34 | 2.26 | 0.00 | 2.30 |
| TRC Ratio NoAdmin | 1.45 | 1.46 | 1.46 | 1.46 | 0.00 | 1.46 |

**Residential Sub-Program**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Year** | **2024** | **2025** | **2026** | **2027** | **2028** | **Program Total** |
| TRC Ratio | 0.25 | 0.28 | 0.29 | 0.29 | 0.00 | 0.28 |
| PAC Ratio | 1.22 | 2.13 | 2.87 | 2.86 | 0.00 | 2.32 |
| TRC Ratio NoAdmin | 0.29 | 0.30 | 0.30 | 0.30 | 0.00 | 0.30 |

1. **Type of Program / Sub-Program Implementer:**

Third-Party Delivered

1. **Market Sector(s):**

Commercial (96.7% of budget) and Residential (3.3% of budget)

1. **Program / Sub-program Type:**

Resource

1. **Market channel(s):**

Downstream

# Implementation Plan Narrative

## Program Description

The Measured Savings Program for Summer Reliability (MSSR) is PG&E’s new Market Access Program[[4]](#footnote-5), solicited by PG&E as a 3rd Party Energy Efficiency Program, pursuant to the California Public Utilities Commission (CPUC) Decision (D.)16-08-019 - Decision Providing Guidance for Initial Energy Efficiency (EE) Rolling Portfolio Business Plan Filings and D.18-05-041 - Decision Addressing EE Business Plans. Alternative Energy Systems Consulting (AESC) was awarded the MSSR solicitation, following a competitive bid process. MSSR is a resource acquisition program which is Aggregator-delivered and pay-for-performance. The Program is designed to deliver measurable impacts at the meter through demand side interventions including building retrofits, optimization, and load flexibility strategies. Aggregators are paid based on weather-normalized hourly energy impacts, measured at the customer meter over a one-year M&V period. Program incentives are correlated to Total System Benefit (TSB), a measure of lifetime grid-avoided costs, and reward projects that deliver summer peak kW reduction[[5]](#footnote-6), as well as measures that have longer Effective Useful Life (EUL). AESC has sub-contracted with Resource Innovations (RI), Earth Advantage (EA), and ASK Energy (ASK) to support program implementation. Collectively these partners are the “AESC Team”. Enrolled Aggregators[[6]](#footnote-7) recruit customers and install projects.

MSSR uses primarily population-based Normalized Meter Energy Consumption (Pop-NMEC), paired with some site-specific NMEC (Site-NMEC), to measure, verify, and pay for TSB delivered to the grid. Program Enrolled Aggregators will have primary responsibility for identifying and enrolling customers that meet program requirements and deliver TSB. Enrolled Aggregators will work with the AESC Team to confirm estimated TSB and receive payments based on measured TSB as determined by the California Energy Data and Reporting System (CEDARS) Cost-effectiveness Tool (CET). The Commercial Program’s objective is to deliver cost-effective TSB and lifecycle Summer Peak kW savings.

It is anticipated that approximately 90% of commercial TSB will be measured using Pop-NMEC and 10% using Site-Level NMEC.

## Program Delivery and Customer Services

The core strategy of MSSR is to accommodate a wide variety of projects and a simplified process for project acceptance, leveraging population-based NMEC. In addition, high value projects that do not fit within Pop-NMEC parameters and meet a TRC threshold, may be able to enroll through the Site-NMEC pathway. Enrolled Aggregators have the flexibility to provide solutions for customers that meet technological and pricing needs, while also maximizing grid value and cost-effectiveness.

The range of services, products and tools provided by the Aggregators is diverse. They have full flexibility to propose services, tools, or interventions (as defined in the “Eligibility” and “Qualifying Measures” section in the attached M&V plan) to customers to encourage adoption, effectuate consumption changes, and manage energy. While the AESC Team will support customer outreach through limited targeting, Aggregators have responsibility for identifying, selling, contracting, and implementing qualified projects with their customers. In some cases, the AESC Team may provide customer referrals to Aggregators. To mitigate risk for customers, only Enrolled Aggregators may offer MSSR incentives to customers.

This program is not designed to address hard-to-reach customer segments, but it is flexible and may be a viable program for doing so. If Aggregators have a business model that can target this customer segment cost effectively, they will be highly valuable participants.

### Market Channels

MSSR offers Pop-NMEC and Site-NMEC channels within MSSR. The majority of the projects will be measured using Pop-NMEC. The AESC Team will enroll select projects for Site-NMEC that meet a minimum savings and TRC threshold and would not otherwise qualify for Pop-NMEC. Thresholds will be defined in the Program Management Plan (PMP).

###  Customer Acquisition

The AESC Team will perform select customer outreach, based on potential to provide the most Summer Peak kW reduction and TSB, to raise visibility about MSSR and prompt enrollment from customers.

Aside from targeted outreach, the majority of customer outreach and engagement will be performed by Enrolled Aggregators. High potential markets and technologies will be discussed in the Aggregator Training, and a list of high potential markets and technologies will be available to help guide Enrolled Aggregator targeting.

To prevent program overlap and for the benefit of customer satisfaction, MSSR will coordinate with CCAs, RENs, and other Program Administrators as outlined in the PMP.

### Program Services and Tools

The AESC Team will provide the following services and tools through MSSR:

* Engage, educate, and enroll Aggregators to identify and implement summer peak kW reduction projects at customer sites.
* Increase market awareness through education to markets that do not participate in EE often and through coordination with Local Government Partnerships (LGPs) to identify projects and generate Program referrals for the Aggregator network.
* Using targeting data, initially prequalify Pop-NMEC eligible sites, creating a centralized database of potential customers, which will be prioritized based on energy use and peak usage in targeted markets and regions.
* Perform targeted outreach to customer types.
* Provide Aggregators with training and support throughout the project enrollment, approval, and M&V process.
* Provide Aggregators with no-cost access to tools that determine site eligibility, project TSB, and incentive value estimation, along with visibility into M&V and payment and incentive statuses.
* Enroll select projects that can bring significant savings to the program for Site-NMEC that meet a minimum cost-effectiveness threshold and would not otherwise qualify for Pop-NMEC. The exact savings and TRC threshold will be defined in the PMP.
* Offer PG&E On Bill Financing (OBF) upon agreement of incentive and financing mechanisms with PG&E.
* Review all project applications, pre- and post-installation, and issue incentive letters and performance period (M&V) notification letters to Aggregators.
* Track Aggregators’ projects and update TSB, customer incentive and Aggregator payment, summer peak kW, and kWh forecasts based on latest data.
* Pay Aggregator based on TSB.
* Manage the incentive forecast, update an Aggregator-accessible funding tracker, and provide regular funding updates through Aggregator newsletters and communications.

## Program Design and Best Practices

### General Program Design and Approach

Designed to use primarily Pop-NMEC and a pay-for-performance design, MSSR leverages Aggregators to identify, enroll, and install projects at customer sites. Aggregators are paid out on actual M&V performance.

The Pop-NMEC approach and TSB performance based-payments will maximize available incentives and result in cost effective TSB. Additionally, to support lifecycle summer peak kW reduction, the AESC Team will supplement Aggregator efforts by targeting customers located in the hottest inland areas of PG&E’s territory and promoting technologies and projects that produce the most summer savings. The AESC Team will connect interested customers with various Aggregators who can serve their needs.

As a meter-based Program, the AESC Team will measure savings at the whole-building level. Thus, any measure that reduces energy use is qualified for MSSR, including to-code, Industry Standard Practice, PG&E expired measures, custom measures (accelerated replacement, add-on equipment, weatherization, behavioral, retrocommissioning (RCx), and operational (BRO)), and deemed measures. New construction and added load measures are not allowed.

Specific technologies are best suited to maximizing the avoided costs, but their adoption (and incentive levels) is a function of the customer needs, financing requirements, and other funding mechanisms available to the aggregator to promote adoption through financing options or shared costs.

Program Design flowcharts may be found in the Supporting Documents, which include Program Theory and Logic Model in Section 2, Process Flow Chart is found in Section 3, and Diagram of Program in Section 6.

#### Aggregator Responsibilities

MSSR will require any Aggregator who is enrolling projects and receiving customer incentives and/or performance-based payments to be an Enrolled Aggregator. Customers must meet the eligibility requirements outlined in the Policies and Procedures (P&P) Manual within the PMP and products must be purchased after project approval as defined in the P&P Manual. All installations must be completed by the Project Installation Deadline of May 3, 2027.

Upon enrollment, Aggregators will be required to participate in program training. This training will be recorded for Aggregator use at enrollment and will cover programmatic information, requirements for participation, and details on the process. While there is no pass/fail process for an Aggregator to sign up and participate in the program, the Aggregator will be required to adhere to the terms and conditions within the Participating Aggregator Agreement (including applicable workforce standards for contractors, accurate energy savings calculations, and complete project application and post-installation packages). Additionally, self-certification forms for contractor project licensing and permits will be required for post-installation project approval as needed. The AESC Team will actively engage and enroll Aggregators into MSSR.

### Strategies and Tactics

The AESC Team will perform outreach to Aggregators to prompt enrollment and perform targeted outreach to increase customer awareness of MSSR to connect Aggregators and customers together for projects that may provide the highest potential for Summer Peak kW reduction and TSB. General strategies to achieve these goals include the following:

**Aggregator Targeting**: In alignment with TSB goals and targeted measures, the AESC Team will target Aggregators who are familiar with NMEC and can identify and enroll projects that yield high TSB and Summer Peak kW savings. This includes, but is not limited to the following:

* Existing PG&E MAP Aggregators
* Regional Aggregators
* RCx providers and Energy Service Companies (ESCOs)
* Load Shift-enabling measures
* Third-party program installers
* “Super-Aggregators”**[[7]](#footnote-8)**

**Customer and Measure Targeting** to raise visibility about the Program and prompt enrollment from customers and projects that may provide the most Summer Peak kW reduction and most valuable TSB.

* **Locational Targeting:** While the Program is available to qualified customers in all PG&E territories, the Program will prioritize targeting Climate Zones (CZ) 12, 13, 3 and 4 where summer peak is driven by addressable loads.
* **Market Segment Targeting:** The Program will prioritize working with Aggregators to target market segments with high summer usage, such as retail, real estate, grocery, convenience, restaurant, lodging, medical, warehouses, and refrigerated warehouse and public sector facilities including police, fire, jails, libraries, recreation, and emergency operations. Among these general market segments, retail chains and portfolios of buildings will be prioritized for targeting.
* **Measures:** Recommended measure bundles for targeted segments will be incorporated into Aggregator training and resources.

Outreach strategies will include direct marketing and emails to the MSSR’s existing Aggregators and networks, webinars, newsletters, social media campaigns, contractor organization conference booths and presentations, and industry association marketing partnerships. Outreach activities, status, and notes will be regularly tracked and enrolled Aggregators will be provided Program-approved materials including logos and badges showing they are enrolled and will be added to the Program’s public-facing Aggregator page with links to their website.

### Best Practices

MSSR adopts several key best practices. Firstly, measuring, and paying upon, verified savings at the meter rather than engineering estimates. Secondly, providing ongoing access to site-level performance so Aggregators can address any performance issues outright to realize maximum savings and support continued customer engagement. Lastly, balancing cost effectiveness requirements and Aggregator risk by considering cost-effectiveness (e.g. TRCNoAdmin) ratios when approving and enrolling projects.

The key program strategies and tactics to reduce barriers for program participation are:

* Reduce technical and administrative barriers associated with traditional deemed, custom, and site-specific NMEC project development pathways.
* Matching customers with Aggregators who are best-equipped to meet their needs, and tying those needs to grid-optimized solutions (as valued in the avoided cost calculator (ACC) adopted by the Commission).
* Leveraging a key benefit of population-level NMEC programs - the inclusion of to-code savings opportunities to reduce “stranded” savings opportunities.

## Innovation

The following innovations will increase MSSR impacts through refined program targeting, enable broader Aggregator participation, and improve modeling automation, accuracy, and efficiency:

* Analyze customer AMI data by zip codes and NAICS code to identify specific customers with high summer peak load with high potential for reduction. Based on this analysis, promising customers will be screened for eligibility and the AESC Team will target these pre-qualified customers to raise program awareness and elicit interest.
* Engage and educate Local Government Partnerships (LGPs) on available Program incentives, best customer target profiles, and coordinate best approaches to share leads.
* Encourage emerging technologies, by leveraging the CalNEXT program.
* Expand customer eligibility and improve M&V analysis through Site-NMEC, modeling solar data, supporting multiple regression models, and modeling electrification paired with energy efficiency.
* Provide Enrolled Aggregators optional no-cost access to measure calculators to generate accurate savings estimates and streamline processes.

To measure the performance and effectiveness of these innovative program elements, the AESC Team will:

* Track the percentage of targeted customers that resulted in post-installation approved projects.
* Track the percentage of LGP customers that resulted in post-installation approved projects.
* Track the number of CalNEXT technologies that result in at least one post-installation approved project.
* Track the percentage of TSB measured through the Site-NMEC pathway.
* Track Aggregators’ satisfaction with the provided measure calculators and tools.

## Metrics

The primary metrics for tracking program progress will be the TSB, Lifecycle Summer Peak kW, and energy savings (kWh, therm), all of which are included in the reporting requirements.

AESC will track the following program metrics in the monthly, quarterly, and annual reporting for enrolled and completed projects:

* Total program savings (kWh, therm)
* Summer Peak kW savings
* Forecasted and Measured Lifecycle Summer Peak kW[[8]](#footnote-9)
* Forecasted and Measured Total Program TSB ($)
* Total Budget Reserved and Spend
* Number of Aggregator enrollments
* Number of project enrollments
* Number of project installations
* Program payment recommendations ($)
* Total Resource Cost Ratio, without Admin (TRC RatioNoAdmin)
* Installed TSB Year-to-Date
* Customer Satisfaction
* Aggregator Satisfaction
* Disadvantaged Worker Reporting
* Disadvantaged Communities (DAC) Customer Reporting

These metrics may be modified based on Commission staff input and final program reporting requirements.

## To-Code Savings

MSSR is an NMEC program. All savings will be demonstrated against an existing conditions baseline including to-code savings.

Capturing to-code savings may be part of any given project that is implemented as part of this program, for any number of technologies. S.B. 350 has authorized programs to capture below code savings to limit stranded potential.

## Pilots

This section is not applicable to this program.

## Workforce Education and Training

MSSR does not have a direct component for workforce education and training.

## Workforce Standards

### General Workforce Standards

Aggregators that join MSSR will adhere to all requirements for workforce standards established by the CPUC in D.18-10-008 Program design requires that participating customers comply with D.18-10-008 workforce standards with their staff or through contractors they hire. Projects will be screened for 100% compliance with D.18-10-008. The following standards are applicable to HVAC and Advanced Lighting Control Energy Efficiency Programs or Projects.

### Workforce Standards for Heating, Ventilation, and Air Conditioning (“HVAC”) and Advanced Lighting Control Programs or Projects

#### Heating, Ventilation, and Air Conditioning (“HVAC”) Energy Efficiency Programs or Projects:

For all Implementer program projects and for each Measure, installed, modified, or maintained in a non-residential setting where the project is seeking an energy efficiency incentive of $3,000 or more, Implementer shall ensure that each worker or technician involved in the project meets at least one of the following criteria:

* + 1. Completed an accredited HVAC apprenticeship.
		2. Is enrolled in an accredited HVAC apprenticeship.
		3. Completed at least five years of work experience at the journey level according to the Department of Industrial Relations definition, Title 8, Section 205, of the California Code of Regulations, passed a practical and written HVAC system installation competency test, and received credentialed training specific to the installation of the technology being installed.
		4. Has a C-20 HVAC contractor license issued by the California Contractor’s State Licensing Board.

This standard shall not apply where the incentive is paid to any manufacturer, distributor, or retailer of HVAC equipment, unless the manufacturer, distributor, or retailer installs or contracts for the installation of the equipment.

#### Advanced Lighting Control Programs or Projects:

For all Program Projects and for each Measure, installed in a non-residential setting where the advanced lighting control project is seeking an energy efficiency incentive of $2,000 or more, Implementer shall ensure that all workers or technicians involved in the project are certified by the California Advanced Lighting Controls Training Program. This requirement shall not apply where the incentive is paid to a manufacturer, distributor, or retailer of lighting controls unless the manufacturer, distributor, or retailer installs or contracts for installation of the equipment.

## Disadvantaged Worker Plan

MSSR does not have a direct component for targeting disadvantaged workers.

## Additional information

PG&E acknowledges that the implementation of MSSR will generate interactive market effects that will impact the delivery of other programs within its broader EE portfolio. A detailed discussion will be forthcoming in the PMP.

# Supporting Documents

## Program Manuals and Program Rules

A Program Management Plan (PMP) containing rules for participation is provided with this Implementation Plan and will be integrated into the AESC MSSR website once established.

[PMP Documentation to be Attached]

## Program Theory and Program Logic Model

Figure 1 below depicts the MSSR program logic model diagram, showing the connections between program goals and objectives, activities, and the short-term, intermediate-term- and long-term outcomes.



Figure 1: MSSR Program Logic Model Diagram

## Process Flow Chart

The following graphic illustrates the process flow for MSSR for the Aggregators and the AESC Team.

 

Figure 2: MSSR Process Flow Chart

## Incentive Tables, Workpapers, Software Tools

MSSR is an NMEC program and does not have fixed measures or incentives. Workpapers are not part of the program plan. The M&V plan within the PMP describes the approach and associated software tools for calculating actual payable and claimable savings.

The AESC Team will provide tools to check eligibility, estimate benefits and incentives, perform M&V, and track project savings and incentives. Refer to the PMP for more information.

Upon project completion and final approval, all meter-based energy and demand savings will be measured, tracked, and recorded in AESC’s software platform, Praxis. Measured savings and the basis of payable savings uses whole building International Performance Measurement and Verification Protocol (IPMVP) Option C methods to calculate Avoided Energy Use. Praxis will be used for all regression modeling, tracking, and reporting of kW, kWh, and therm impacts for Pop-NMEC and Site-NMEC projects. In both meter-based approaches, Praxis will analyze and assess multiple models to identify the best fit, but the approach will vary between the two paths. The M&V Plan within the PMP provides details on M&V calculation and approach.

## Diagram of Program



Figure 3. MSSR Program Diagram

## Evaluation, Measurement & Verification (EM&V)

As requested, AESC will support EM&V or other evaluation efforts. The M&V Plan within the PMP provides detail on M&V calculation and approach.

## Normalized Metered Energy Consumption (NMEC)

MSSR NMEC M&V Plan is provided within the attached PMP.

1. Residential sub-program will launch after the launch of the Commercial sub-program. An Implementation Plan and Program Management Plan addendum will be developed during Launch Readiness of the Residential Sub-program. Sub-program will be added to CEDARS at that time. [↑](#footnote-ref-2)
2. Inclusive of both incentives that go to the Customer and the Aggregator [↑](#footnote-ref-3)
3. Lifecycle Summer Peak kW Savings = EUL\* Summer Peak kW, where Summer Peak kW is during the summer peak period of 4 p.m. to 9 p.m., June 1 and September 30. [↑](#footnote-ref-4)
4. The PG&E Market Access Program was originally mandated by the Governor of California, beginning in 2022 and recently closed to new projects in Q1 2024 (all remaining M&V will complete in Q2 2025). [↑](#footnote-ref-5)
5. Summer Peak is defined as June through Sept, 4 pm - 9pm. [↑](#footnote-ref-6)
6. Trade professional, contractor, or project developer who has signed an agreement with MSSR to identify and enroll customers to implement energy efficiency projects that will be measured in the MSSR. Enrolled Aggregators receive incentive payments for the customers’ projects. [↑](#footnote-ref-7)
7. Aggregators who often have market specialty and can assemble portfolios of customers, coordinate multiple subcontractors on a comprehensive project, and assume performance risk or facilitate financing for up-front installer costs. [↑](#footnote-ref-8)
8. Lifecycle Summer Peak kW = EUL\* Summer Peak kW [↑](#footnote-ref-9)