



ADVICE LETTER



ENERGIUILIII	YF CALL				
MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)					
Company name/CPUC Utility No.: Marin Clean Energy					
Utility type: GAS WATER PLC HEAT	Contact Person: Jana Kopyciok-Lande Phone #: 415-464-6044 E-mail: ikopyciok-lande@mcecleanenergy.org E-mail Disposition Notice to: jkopyciok-lande@mcecleanenergy.org				
EXPLANATION OF UTILITY TYPE ELC = Electric GAS = Gas WATER = Water PLC = Pipeline HEAT = Heat WATER = Water	(Date Submitted / Received Stamp by CPUC)				
Advice Letter (AL) #: 37-E	Tier Designation: 2				
Subject of AL: Marin Clean Energy's 2020 Energy I Keywords (choose from CPUC listing): Energy E AL Type: ☐ Monthly ☐ Quarterly ✓ Annua	fficiency, Compliance al One-Time Other:				
If AL submitted in compliance with a Commission 18-05-041, Ordering Paragraphs 40 - 45	on order, indicate relevant Decision/Resolution #:				
Does AL replace a withdrawn or rejected AL? I	f so, identify the prior AL: N/A				
Summarize differences between the AL and th	e prior withdrawn or rejected AL: N/A				
Confidential treatment requested? Yes No If yes, specification of confidential information: Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:					
Resolution required? Yes V No Requested effective date: 10/4/19	No. of tariff sheets: 0				
Estimated system annual revenue effect (%): N/A					
Estimated system average rate effect (%): N/A					
When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).					
Tariff schedules affected: $_{ m N/A}$					
Service affected and changes proposed $^{1:}$ $_{ m N/P}$	A.				
Pending advice letters that revise the same tariff sheets:					

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

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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	

September 3, 2019

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



MCE Advice Letter 37-E

Re: Marin Clean Energy's 2020 Energy Efficiency Annual Budget Advice Letter

Pursuant to Decision ("D.") 18-05-041, *Decision Addressing Energy Efficiency Business Plans*, Ordering Paragraphs ("OP") 40 and 41, Marin Clean Energy ("MCE") submits its Annual Budget Advice Letter ("ABAL") for Program Year 2020 as MCE Advice Letter ("AL") 37-E.¹

<u>Tier Designation</u>: This AL has a Tier 2 designation pursuant General Order ("G.O.") 96-B, Energy Industry Rule 5.2 and D.18-05-041.

Effective Date: Pursuant to G.O. 96-B, MCE requests that this Tier 2 AL become effective on October 4, 2019, which is 30 calendar days from the date of this filing.

Purpose

The purpose of this advice filing is to request MCE's energy efficiency budget for Program Year 2020. This AL complies with D.18-05-041, which requires MCE to file an ABAL by September 3, 2019. The ABAL provides information about MCE's approved energy efficiency portfolio, including (1) cost effectiveness; (2) budgets; (3) energy savings; and (4) portfolio changes.

Background

MCE has administered energy efficiency funds under California Public Utilities Code ("Code") Section 381.1(a)-(d) since 2013.² The California Public Utilities Commission ("Commission") originally restricted MCE's energy efficiency programs to serving gaps in Investor Owned Utility ("IOU") programs and hard to reach markets.³ At the time, the Commission acknowledged that these restrictions may cause MCE's portfolio to fail the Total Resource Cost ("TRC") test and thus did not initially impose a minimum cost effectiveness requirement on MCE.⁴ In 2014, however,

¹ D.18-05-041, OP 40, 41 at p. 191.

² To date, MCE is the only community choice aggregator ("CCA") to have requested energy efficiency funding under Code Section 381.1(a)-(d).

³ D.12-11-015 at pp.45-6.

⁴ D.12-11-015 at p. 46.

the Commission lifted the restrictions and imposed the same cost effectiveness requirements on CCAs as IOUs.⁵

Program Administrators ("PA") were invited to submit business plans in 2017. On January 17, 2017, MCE filed a Business Plan with the Commission that requested authorization to expand MCE's energy efficiency portfolio to include additional sectors and programmatic offerings. MCE proposed to offer programs in the following sectors: (1) Residential; (2) Commercial; (3) Industrial; (4) Agricultural; and (5) Workforce Education and Training. On June 5, 2018, the Commission approved MCE's Business Plan.

2020 Program Year Cost Effectiveness

Decision 18-05-041 provided guidance to Commission staff on how to evaluate PAs' ABALs, which included guidance on portfolio cost effectiveness. For Program Years 2019-2022, PAs' portfolios must meet a forecasted TRC at or above 1.0. For Program Years 2023-2025, PAs' portfolios must meet a forecasted TRC at or above 1.25. In the event a PA does not meet a TRC of 1.25 on a forecast basis for Program Years 2019-2022, ABALs must contain additional discussion about how the PA intends to meet or exceed a 1.0 TRC on an evaluated basis.

MCE's forecasted portfolio TRC, program administrator cost ratio ("PAC") and ratepayer impact measure ("RIM") for 2020, all calculated without market effects, are provided below.

Table 1. Forecasted Portfolio TRC, PAC, and RIM for 2020

Forecasted Portfolio TRC, PAC, and RIM for 2020			
TRC	1.01		
PAC	1.05		
RIM	1.05		

Table 2: Forecasted Sector-level TRC and PAC for 2020

Sector	TRC	PAC
Residential	1.07	1.11
Agricultural	1.12	1.22
Commercial	0.90	0.88
Industrial	1.17	1.30
WE&T	0.00	0.00

⁵ D.14-01-033 at p. 14; see also D.14-10-046 at p. 120.

⁶ See Application of Marin Clean Energy for Approval of its Energy Efficiency Business Plan (Application ("A.") 17-01-017) filed January 17, 2017.

⁷ D.18-05-041, OP 33 at p. 189.

⁸ D.18-05-041 at pp. 132-37.

Table 3: Forecasted Program-level TRC and PAC for 2020

Program	Program	TRC	PAC
	ID		
Multifamily Comprehensive	MCE01	0.99	1.05
Commercial	MCE02	0.90	0.88
Single Family Seasonal Savings	MCE03	1.83	1.83
Multifamily Direct Install	MCE05	0.56	0.58
Single Family Comprehensive	MCE07	1.57	1.57
Single Family Direct Install	MCE08	0.92	0.96
Industrial	MCE10	1.17	1.30
Agricultural	MCE11	1.12	1.22
Workforce Education and Training (WE&T)	MCE16	0.00	0.00
MCE: EM&V	MCE98	0.00	0.00

MCE identified a set of factors that resulted in an *ex ante* TRC below 1.25 in 2020. MCE's portfolio is in transition, from one focused heavily on residential and small commercial offerings to a more comprehensive portfolio with a range of programs to balance out cost effectiveness. The challenges that MCE faces in forecasting a 1.25 TRC are mostly related to the time required to design, launch and develop a pipeline of projects in the more cost-effective programmatic areas. In 2019, MCE experienced some delays in new program roll outs due to several factors, including: (1) limitations in MCE's ability to access customer usage data; (2) changing deemed measure parameters; and (3) the complexity of developing new contracting structures for programs using normalized metered energy consumption ("NMEC") data.

In 2020, MCE expects to see some of the new programs launched in 2019 begin to deliver savings. MCE's agricultural, industrial and large commercial programs are expected to deliver cost effective savings to help offset some of the less cost-effective programs in MCE's portfolio. MCE's residential NMEC program is also expected to begin generating cost effective savings in 2020, although there is some uncertainty around the projections because this is a new savings methodology for MCE and it is unknown how evolving regulatory guidance will affect the program.

Other programs in MCE's portfolio experienced setbacks as a result of changing market conditions. Two program strategies—the multifamily and single-family single measure program and the customer-facing project assessment and procurement platform for small commercial customers—were not found to be cost effective as a result of changes to deemed measure savings, including the 2019 updates to the Database of Energy Efficiency Resources ("DEER"). As a result, these two programs were not rolled out to customers and MCE has had to explore other strategies to serve those sectors. Across all programs, MCE continues to adjust measure lists to reflect new savings values and market conditions.

MCE is committed to meeting the evaluated 1.0 TRC requirement through smart and responsive program design and deployment. To facilitate better oversight of programs, MCE is launching new program data management tools and will be increasing the frequency of full project data collection from quarterly to monthly. MCE will use these tools to track progress on energy savings and metrics. Other initiatives to increase savings and lower costs in 2020 include:

- Scaling up existing programs (including expansion to new service areas⁹);
- Focus on marketing and outreach by using meter data analysis to target customers and working closely with MCE's account services team;
- Use of performance-based implementation contracts; and
- Deploying measure cost savings strategies within existing programs by increasing transparency and competition among installation contractors.

Forecasted, Claimed, and Evaluated Cost Effectiveness Information from Previous Years

Table 4: Portfolio-level forecasted, claimed, and evaluated TRC and PAC beginning with 2016

Year	Forecasted TRC	Forecasted PAC	Claimed TRC	Claimed PAC	Evaluated TRC ¹⁰	Evaluated PAC
2016 ¹¹	na	na	0.27	0.48	na	na
2017	0.91	1.01	0.65	0.96	na	na
2018	0.58	0.64	0.31	0.91	na	na

Table 5: Sector-level claimed TRC and PAC from two most recent years

Sector	Year	TRC	PAC
Commercial	2018	1.04	1.21
Residential	2018	0.59	0.69
Commercial	2017	1.17	1.33
Residential	2017	0.27	0.51

Table 6: Program-level claimed TRC and PAC from two most recent years

Program	Program	Year	TRC	PAC
	ID			
Multifamily Comprehensive	MCE01	2018	0.12	0.67
Small Commercial	MCE02	2018	1.04	1.21
Single Family Seasonal Savings	MCE03	2018	0.80	0.80
Financing Pilots	MCE04	2018	0.00	0.00
EM&V	MCE98	2018	0.00	0.00
Multifamily Comprehensive	MCE01	2017	0.26	0.55

⁹ Unincorporated Solano County will be joining MCE in 2020.

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¹⁰ The most recent year in which the CPUC evaluated MCE's programs for cost effectiveness was 2014.

¹¹ Program Administrators did not file ABALs for program year 2016.

Small Commercial	MCE02	2017	1.17	1.33
Single Family Seasonal Savings	MCE03	2017	0.34	0.34
Financing Pilots	MCE04	2017	0.00	0.00
EM&V	MCE98	2017	0.00	0.00

Budgets

The Commission approved funding levels for MCE for Program Years 2018-2025 for each of MCE's proposed sectors, including allocations for Evaluation Measurement and Verification ("EM&V"). The Commission approved a total multiyear budget for MCE of \$85,736,000 for the business plan period (Program Years 2018-2025). For Program Years 2018 and 2019, the Commission approved an annual budget of \$8,532,000. Although D.18-05-041 approved annual and multiyear budgets, the Commission directed PAs to use the ABAL as an opportunity to adjust their annual budgets "to reflect the 2018-2030 goals adopted in Decision 17-08-025 and the interim greenhouse gas adder adopted in Decision 17-08-022 and other relevant factors to provide a more accurate forecast of expected annual funding levels." The revisions, however, must not exceed the overall funding amount authorized in D.18-05-041, which caps PAs' total spending for the period 2018-2025. ¹⁴

MCE provides the revised portfolio, sector and program budgets for the business plan period below. MCE also submits the supplemental budget filing as Attachment 1.

Table 7. Forecast 2020 Sector-Level Budget and Savings (Net)

Sector	Program Year	kWh	kW	therms
	Budget			(MM)
Residential	\$2,163,109	5,087,595	539	0.24
Commercial	\$1,477,001	3,164,164	524	0.02
Industrial	\$2,125,484	2,150,599	340	0.27
Agriculture	\$687,463	1,040,037	224	0.02
Emerging Tech	\$0	na	na	na
Public	\$0	na	na	na
Codes and Standards	\$0	na	na	na
WE&T	\$346,667	na	na	na
Finance	\$0	na	na	na
OBF Loan Pool	\$0	na	na	na
Subtotal	\$6,799,724	11,442,395	1,628	0.55
PA EM&V	\$108,796			

¹² D.18-05-041 at p. 112.

¹³ D.18-05-041, OP 43 at pp. 191-92.

¹⁴ D.18-05-041, OP 43 at pp. 191-92.

Total PA PY Spending Budget	\$6,908,519		
Uncommitted and Unspent Carryover balance ¹⁵	\$3,338,700		
Total PA PY Budget Request ¹⁶	\$3,569,819		
Authorized PY Budget Cap (D.18-05-041)	\$12,404,000		

MCE requests Pacific Gas and Electric Company ("PG&E") provide the 2020 budget, including electricity and natural gas energy funding to MCE via quarterly transfers as calculated in the table below.

Table 8: Quarterly Fund Transfers from PG&E to MCE

Fuel Type	2020 Budget Request	Quarterly Transfer
Total Electric Budget	\$2,391,779	\$597,945
Total Gas Budget ¹⁷	\$1,178,040	\$294,510
Total	\$3,569,819	\$892,455

Table 9: Forecast 2020 Budget request of each program

Program	Program	Fore	cast 2020 Budget
	ID		
Multifamily Comprehensive	MCE01	\$	412,358
Commercial	MCE02	\$	1,477,001
Single Family Seasonal Savings	MCE03	\$	101,845
Multifamily Direct Install	MCE05	\$	391,064
Single Family Comprehensive	MCE07	\$	552,865
Single Family Direct Install	MCE08	\$	704,976
Industrial	MCE10	\$	2,125,484
Agricultural	MCE11	\$	687,463
Workforce Education and Training	MCE16	\$	346,667
(WE&T)			
MCE: EM&V	MCE98	\$	108,796
Total		\$	6,908,519

¹⁵ The uncommitted and unspent carryover balance reflects the total unspent and uncommitted funds from all previous program years that will be used to offset the 2020 fund transfers. More detail on this number can be found in MCE's CEDARS filing. Because each ABAL is filed in Q3, this unspent uncommitted amount is an estimate for the year in which the ABAL is filed

¹⁶ The amount of funds to be collected (budget recovery) for the Program Year.

¹⁷ Pursuant to OP 36 of D.18-05-041, gas budgets will be transferred to MCE on a quarterly basis.

Table 10. Annual Budget Forecast and Caps by Sector and Total

Sector	2020	2021	2022	2023	2024	2025
Residential	\$2,163,109	\$7,078,017	\$6,170,017	\$6,170,017	\$6,170,017	\$5,660,017
Commercial	\$1,477,001	\$3,292,922	\$2,934,922	\$2,934,922	\$2,934,922	\$3,251,922
Industrial	\$2,125,484	\$1,283,596	\$1,269,596	\$1,269,596	\$1,269,596	\$1,260,596
Agriculture	\$687,463	\$1,253,259	\$1,181,259	\$1,181,259	\$1,181,259	\$1,260,259
Emerging Tech	0	0	0	0	0	0
Public	0	0	0	0	0	0
Codes and Standards	0	0	0	0	0	0
WE&T	\$346,667	\$346,667	\$346,667	\$346,667	\$346,667	\$346,667
Finance	0	0	0	0	0	0
OBF Loan Pool	0	0	0	0	0	0
Subtotal	\$6,779,724	\$13,254,460	\$11,902,460	\$11,902,460	\$11,902,460	\$11,779,460
EM&V ¹⁸	\$108,796	\$211,005	\$189,405	\$189,405	\$189,405	\$187,405
Total Portfolio	\$6,908,519	\$13,465,465	\$12,091,865	\$12,091,865	\$12,091,865	\$11,966,865
Annual Budget						
Forecast						
Total Portfolio	\$12,404,000	\$12,404,000	\$10,998,000	\$10,998,000	\$10,998,000	\$10,870,000
Budget Cap						

¹⁸ EM&V budget includes only the program administrator portion (40%) and excludes the Commission staff portion (60%).

Authorized Budgets and Actual Expenditures from Previous Years

Table 11: Portfolio-level authorized budgets and actual expenditures beginning with 2016

Year	Authorized Budgets	Actual Expenditures
2016	\$1,586,347	\$1,165,285
2017	\$1,586,347	\$1,403,313
2018	\$1,831,740	\$1,347,788

Table 12: Sector-level authorized budgets and actual expenditures from two most recent years

Sector	Year	Authorized	Actual
		Budgets	Expenditures
Commercial	2018	\$838,745	\$617,207
Residential	2018	\$935,936	\$695,467
Cross-cutting	2018	\$57,060	\$35,114
Commercial	2017	\$658,711	\$774,411 ¹⁹
Residential	2017	\$900,605	\$609,679
Cross-cutting	2017	\$27,031	\$19,223
Total		\$3,418,087	\$2,751,101

Table 13: Program-level authorized budgets and actual expenditures from two most recent years

Program	Program ID	Year	Authorized Budgets	Actual Expenditures
Multifamily	MCE01	2018	\$728,686	\$558,107
Comprehensive				
Small Commercial	MCE02	2018	\$838,745	\$617,207
Single Family Seasonal Savings	MCE03	2018	\$207,250	\$137,360
Financing Pilots	MCE04	2018	\$27,031	\$18,524
EM&V	MCE98	2018	\$30,029	\$16,590
Multifamily Comprehensive	MCE01	2017	\$667,555	\$491,844
Small Commercial	MCE02	2017	\$658,711	\$774,411 ²⁰
Single Family Seasonal Savings	MCE03	2017	\$233,050	\$117,835
Financing Pilots	MCE04	2017	\$27,031	\$19,223

¹⁹ Actual Expenditures exceed Authorized Budgets due to mid-year fund shifting between programs.

²⁰ Actual Expenditures exceed Authorized Budgets due to mid-year fund shifting between programs.

EM&V	MCE98	2017	\$0	\$0
Total			\$3,418,088	\$2,751,101

Energy Savings Goals

D.18-05-041 stated that MCE's forecasted energy savings goals must meet or exceed the annual energy savings targets included in the business plan. Subsequently, MCE submitted budget and energy savings true-up tables in the 2019 ABAL that more accurately reflect the planning assumptions and forecasts for each program year through the business plan period. In D. 19-08-034 Decision Adopting Energy Efficiency Goals for 2020-2030, the Commission directed MCE that for each year that MCE requests energy efficiency funding authorization via an ABAL, MCE shall meet or exceed the annual savings forecasts presented in the true-up tables as submitted in MCE's PY 2019 ABAL (and subsequently approved in Energy Division's advice letter disposition).

MCE provides below forecasted savings for each program for PY 2020.

Table 14: 2020 Forecasted Net Energy Savings by Program

Program	Program	Net kWh	Net	Net
	ID		$\mathbf{k}\mathbf{W}$	Therm
Multifamily Comprehensive	MCE01			
		144,590	6	23,889
Commercial	MCE02			
		3,164,164	524	19,978
Single Family Seasonal Savings	MCE03			
		286,694	29	118,653
Multifamily Direct Install	MCE05			
		193,402	26	7,572
Single Family Comprehensive	MCE07			
		4,072,319	407	56,147
Single Family Direct Install	MCE08			
		390,589	72	33,048
Industrial	MCE10			
		2,150,599	340	268,485
Agricultural	MCE11			
		1,040,037	224	24,882

²¹ D.18-05-041 at p. 134

²² MCE Advice Letter 33-E pp.9-11

²³ D.19-08-034 at p.28

Workforce Education and Training (WE&T)	MCE16			
		-	-	-
MCE: EM&V	MCE98			
		-	-	-
Total				
		11,442,395	1,628	552,654

Table 15. 2020 Energy Savings Goals by Sector²⁴

Sector	Net kWh	Net kW	Net MM therms
Residential	2,850,293	245	0.42
Commercial	3,641,084	116	0.01
Industrial	1,179,161	38	0.12
Agriculture	709,938	84	0.01
Emerging Tech	n/a	n/a	n/a
Public	n/a	n/a	n/a
Codes and Standards	n/a	n/a	n/a
WE&T	n/a	n/a	n/a
Finance	n/a	n/a	n/a
OBF Loan Pool	n/a	n/a	n/a
Total Forecast	8,380,475	484	0.55
Portfolio Savings			

Forecasted, Claimed, and Evaluated Energy Savings from Previous Years

Table 16: Program-level claimed energy savings beginning with 2016

Year	Program	Program ID	Net kWh	Net kW	Net Therm
2018	Multifamily Comprehensive	MCE01			
			151,217	8	16,468
2018	Commercial	MCE02			
			823,364	126	(889)
2018	Single Family Seasonal Savings	MCE03			
			185,010	19	54,801
2018	Financing	MCE04			
			-	-	-
2018	MCE: EM&V	MCE98			
			-	-	-

²⁴ These energy savings goals were established in the true-up tables in MCE's 2019 ABAL submission. Per D. 19-08-034, MCE must meet or exceed these savings goals for each year that MCE requests energy efficiency funding authorization via an ABAL

2017	Multifamily Comprehensive	MCE01			
	-		134,084	16	7,541
2017	Commercial	MCE02			
			1,077,926	202	754
2017	Single Family Seasonal Savings	MCE03			
			50,233	5	26,526
2017	Financing	MCE04			
			-	-	-
2016	Multifamily Comprehensive	MCE01			
			254,444	24	8,112
2016	Commercial	MCE02			
			310,753	62	12
2016	Single Family Seasonal Savings	MCE03			
			-	-	-
2016	Financing	MCE04			
			-	-	-
Total					
			2,987,031	462	113,325

Table 17: Portfolio-level forecasted, claimed, and evaluated savings beginning with 2016

	2016			2017			2018		
Energy Savings	Forecasted ²⁵	Claimed	Evaluated ²⁶	Forecasted	Claimed	Evaluated	Forecasted	Claimed	Evaluated
Net kWh	na	565,198	na	1,812,755	1,262,243	na	1,846,948	1,159,591	na
Net kW	na	87	na	351	223	na	349	153	na
Net Therms	na	8,124	na	33,850	34,821	na	70,289	70,381	na

²⁵ Program Administrators did not file ABALs for program year 2016.

²⁶ The most recent year in which the CPUC evaluated MCE's programs for cost effectiveness was 2014.

Table 18: GHG savings forecast, actuals and goals beginning with 2016

Year	GHG Forecast and Goal ²⁷ (Metric Tons CO ₂₎	GHG Savings (Metric Tons CO ₂₎
2016	na	300
2017	919	750
2018	507	516

Sector-Level Metrics

Measured progress through 2018 for sector-level metrics can be found in MCE's 2018 Annual Report Excel file. ²⁸

Portfolio and Program Changes

MCE identified several high-level changes to the portfolio that will help optimize cost effectiveness and achieve savings goals. These changes are responsive to current policy and market dynamics and consistent with MCE's business plan.

- MCE aims to utilize NMEC in a number of programs to help leverage pay-for-performance contracts and competitive bidding.
- In an effort to reduce administrative costs, core elements of program design, implementation, and management will be shifted to implementers.
- MCE will hold competitive solicitations allowing for industry experts and the market to drive program design, implementation of programs, and to aggregate customers to deliver meter-verified savings.
- MCE has expanded its portfolio by increasing the size of its service area and offering programs in new sectors such as large commercial, industrial, agriculture, and single family residential while also increasing offerings under existing commercial and multifamily programs.
- MCE is preparing to incorporate fuel substitution measures into programs following the guidance of D.19-08-009 *Decision Modifying the Energy Efficiency Three-Prong Test Related to Fuel Substitution* published on August 1, 2019.

MCE anticipates cost-effectiveness to improve over time. MCE launched programs in new sectors in 2020. This expanded portfolio will experience a natural ramp-up period in which the administrative costs of program design, rollout and customer outreach will have a greater impact on cost effectiveness. Where possible, MCE will reduce implementation costs and customer

²⁷ Prior to 2019, MCE's annual goals were established using the ABAL forecast. Hence, the annual goal for years 2016-2018 is equal to our annual forecast.

²⁸ See MCE's 2018 Annual Report Narrative and Excel at: http://eestats.cpuc.ca.gov/Views/Documents.aspx

project costs, which will eventually contribute to a more cost-effective portfolio. MCE describes some of the program-level changes that will improve MCE's portfolio below.

Programs that have ended:

Residential Single Measure Program: MCE stopped program development after an analysis of the changes to deemed measures since the business plan was filed in 2017 showed that the program was unlikely to be cost effective. This program was planned for in MCE's 2019 ABAL but never launched to customers.

Programs unchanged from 2019 to 2020:

<u>Industrial:</u> This program will provide technical project development resources, procurement support and a mix of deemed and calculated incentives for industrial customers within MCE's service area.

<u>Agricultural:</u> This program will provide technical project development resources, procurement support and a mix of deemed and calculated incentives for agricultural customers.

<u>Seasonal Savings:</u> This program offers customers the opportunity to make their cooling and heating schedules more efficient through a series of small adjustments to scheduled temperatures by a software algorithm. Customers are offered the program on their thermostat and/or through a phone app and must opt-in to participate. This program will be expanded to new service areas but otherwise remains largely unchanged.

Residential Standalone Direct Install: This program will provide no-cost energy and water saving upgrades, health and safety measures, and access to other resources and non-energy services for single family homeowners and renters. This offering will include conservation education.

Workforce, Education, and Training: MCE has worked with PG&E to develop coordination guidelines to avoid duplication where appropriate, minimize market confusion, and ensure customer choice, and will continue to do so as the portfolio evolves. MCE's approach to WE&T is to fill gaps and allow the market to dictate program design. MCE will solicit bids to identify existing needs and gaps to determine program design ensuring alignment with policy impacts. MCE will continue working with IOUs to ensure alignment and avoid duplication with the statewide WE&T program.

Programs that have changes:

<u>Multifamily Energy Savings:</u> This program provides complimentary walk-through energy assessments and technical assistance to identify energy and water saving opportunities at multifamily properties. To help implement these energy upgrades, the program provides cash rebates, assists with contractor bid solicitations and educates and trains operations and maintenance staff. To increase the cost effectiveness of MCE's program without reducing services available to customers, MCE will be coordinating with BayREN to jointly serve customers.

<u>Commercial:</u> MCE continues to serve small commercial customers through its direct install program but has added a comprehensive offering for large commercial customers. The expanded program will make use of custom and NMEC savings calculations and will

work closely with MCEs account services team to offer better services to MCEs larger customers.

Programs to be launched in 2020:

Residential NMEC: This program will offer behavioral intervention strategies and upgrade recommendations to residential customers. Savings will be calculated and paid for using NMEC methodology.

Notice

A copy of this AL is being served on the official Commission service lists for Application 17-01-013, *et al.* and Rulemaking 13-11-005.

For changes to these service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@epuc.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 20 days after the date of this advice filing. Protests should be mailed to:

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

Email: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address as above).

In addition, protests and all other correspondence regarding this AL should also be sent by letter and transmitted electronically to the attention of:

Jana Kopyciok-Lande Senior Policy Analyst MARIN CLEAN ENERGY 1125 Tamalpais Ave. San Rafael, CA 94901

Phone: (415) 464-6044 Facsimile: (415) 459-8095

jkopyciok-lande@mceCleanEnergy.org

Alice Havenar-Daughton
Director of Customer Programs
MARIN CLEAN ENERGY
1125 Tamalpais Ave.
San Rafael, CA 94901

Phone: (415) 464-6030 Facsimile: (415) 459-8095

ahavenar-daughton@mceCleanEnergy.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 Jana Kopyciok-Lande at (415) 464-6044 or by electronic mail at jkopyciok-lande@mceCleanEnergy.org.

Conclusion

MCE respectfully requests approval of its 2020 energy efficiency portfolio budget.

/s/ Jana Kopyciok-Lande

Jana Kopyciok-Lande Senior Policy Analyst MARIN CLEAN ENERGY

ATTACHMENTS

- ATTACHMENT 1: MARIN CLEAN ENERGY SUPPLEMENTAL BUDGET SHOWING
- ATTACHMENT 2: MARIN CLEAN ENERGY CEDARS FILING SUBMISSION RECEIPT

cc: Service Lists: R.13-11-005; A17-01-013, et al.

Attachment 1: Marin Clean Energy Supplemental Budget Showing

I. DESCRIPTION OF IN-HOUSE EE ORGANIZATIONAL STRUCTURE & ASSOCIATED COSTS

A. Narrative description of in-house departments/organizations supporting MCE's EE portfolio

1. Functions conducted by each department/organization MCE provides the following table to summarize the functions conducted by each in-house department based on the functional groups defined in the "Functions Definitions" in Appendix B.

Table 1: Functions Conducted by Departments Supporting MCE's EE Portfolio

Function	Customer Programs	Regulatory and Legislative Policy & Legal *	Public Affairs *	Administrative Services *
Policy, Strategy, and Regulatory Reporting Compliance	X	x		
Program management	x			
Engineering Services				
Customer Application/Rebate and Incentive Processing	X			
Inspections				
Portfolio Analytics	X			
EM&V	X			
ME&O	X		X	
Account Management / Sales			X	
IT				X
Call Center				
Incentives				

^{*} These departments do not recover costs from the energy efficiency program budget.

2. Management structure and organization chart

MCE provides organizational charts for each department supporting the energy efficiency portfolio in Appendix A. These charts include the entire staff within each department even though only a subset of each team provides support to the energy efficiency portfolio. The management structure is represented on these organizational charts.

3. Staffing needs by department/organization

MCE's org charts are provided in Appendix A. MCE hired two programs specialists in 2018 to support the energy efficiency portfolio. MCE does not anticipate hiring additional Customer Programs staff to support energy efficiency programs beyond what is provided in the organization chart. The staffing needs for the Customer Programs department and other departments at MCE may change in the future. However, those changes are unlikely to be driven by the need to support energy efficiency functions. As a result, MCE doesn't project long term growth in those departments related to supporting the energy efficiency portfolio.

Non-program functions currently performed by contractors MCE currently works with contractors to support program reporting and M&V.

5. Anticipated drivers of in-house cost changes by department/organization MCE's in-house costs largely consist of staffing costs and since there are no further staffing changes planned for 2020, in-house cost should stay relatively steady.

6. Explanation of method for forecasting costs

MCE's Customer Program team developed a bottom-up budget and savings forecast using portfolio costs from 2018 and 2019 as a guide to extrapolate to new sectors and an expanded service area to meet the 2020 projected savings values forecasted in the 2019 Annual Budget Advice Letter Filing.

B. Table showing MCE's "Full-Time Equivalent" headcount by department/organization

MCE provides this table in Appendix B.

C. Table showing costs by functional area of management structure

MCE provides this table in the: (1) Residential Budget Detail; (2) Commercial Budget Detail; (3) Industrial Budget Detail; (4) Agricultural Budget Detail; (5) and Cross-Cutting Budget Detail of Appendix C.

D. Table showing cost drivers across the EE organization

MCE's 2020 budget request is only 2% higher than its 2019 authorized budget. MCE expects to underspend its 2019 budget due to some delays in ramping up programs in new sectors. With some of those programs having launched in mid to late 2019, MCE does not expect its 2020 budget to be significantly higher than its 2019 authorized budget.

E. Allocation of labor and O&M costs

MCE staff complete timesheets on which they designate the number of hours spent on EE activities. For employees who work on both EE and non-EE work, labor costs are billed proportionally based on hours recorded on staff timesheets for each activity.

The costs for the time spent on EE activities are reimbursed from the EE Programs Account. This account draws on the awarded energy efficiency budget. Costs from other departments that support MCE's EE portfolio are not reimbursed from the EE Programs Account. Those departments are fully supported from the General Operating Account (funded by generation service revenues).

Labor costs charged to EE are fully loaded. Benefit-related expenses for MCE employees who bill time to the EE program are paid from the EE Programs Account proportionate to the amount of time they spend on EE Programs. These costs are incorporated into the "fully-burdened" cost MCE charges to the EE reimbursable account as aforementioned.

Non-labor resources that support EE and non-EE activities are paid for entirely using non-EE funds from the General Operating Account (funded by generation services revenues). The only non-labor resources that are paid for with EE funds are those that exclusively support EE.

All O&M costs are paid for with non-EE funds from the General Operating Account (funded by generation service revenues), unless they exclusively support EE, in which case they are paid for using EE funds.

II. BUDGET TABLES INCLUDING INFORMATION IDENTIFIED IN THE SCOPING MEMO

A. Attachment-A, Question C.8

"Present a single table summarizing energy savings targets, and expenditures by sector (for the six specified sectors). This table should enable / facilitate assessment of relative contributions of the sectors to savings targets, and relative cost-effectiveness."

MCE has provided the requested information in Appendix D. MCE's Customer Program team developed a bottom-up budget and savings forecast using portfolio costs from 2018 and 2019 as a guide to extrapolate to new sectors and an expanded service area to meet the 2020 projected savings values forecasted in the 2019 Annual Budget Advice Letter Filing.

B. Attachment-A, Question C.9

"Using a common budget template developed in consultation with interested stakeholders (hopefully agreed upon at a "meet and confer" session), display how much of each year's budget each PA anticipates spending "in-house" (e.g., for administration, non-outsourced direct implementation, other non-incentive costs, marketing), by sector and by cross-cutting program."

MCE has provided the request information in Appendix E. MCE developed a staffing budget based on our projected staffing needs. The distribution of staffing costs across budget categories for 2020 is based on the allocation in 2018 with some adjustments for areas in which we expect staff involvement to increase. The allocation of staffing costs for 2018 is based on staff estimations for the requested budget categories.

C. Attachment-A, Question C.10

"Present a table akin to PG&E's Figure 1.9 (Portfolio Overview, p 37) or SDG&E's Figure 1.10 (p. 23) that not only shows anticipated solicitation schedule of "statewide programs" by calendar year and quarter, but also expected solicitation schedule of local third-party solicitations, by sector, and program area (latter to extent known, and/or by intervention strategy if that is more applicable). For both tables, and for each program entry on the calendar, give an approximate size of budget likely to be available for each solicitation (can be a range)."

This question is not applicable to MCE.

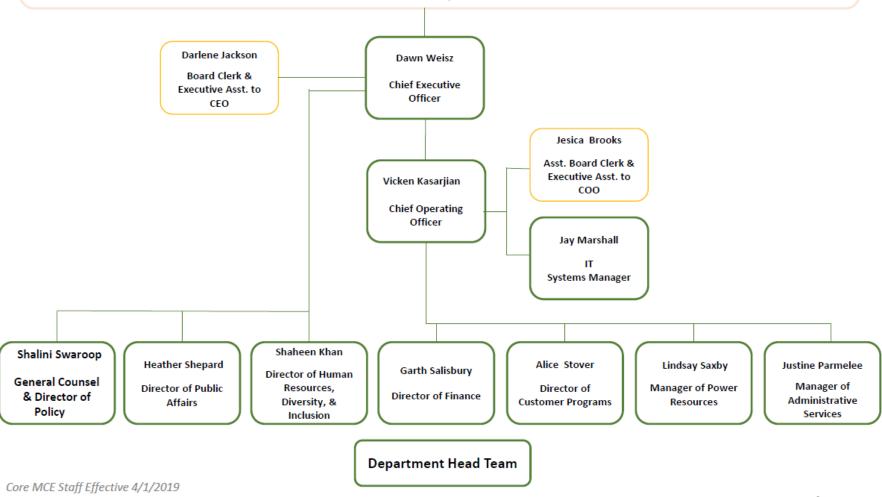
III. Appendices

Appendix A: Supporting Information – Request I. A.

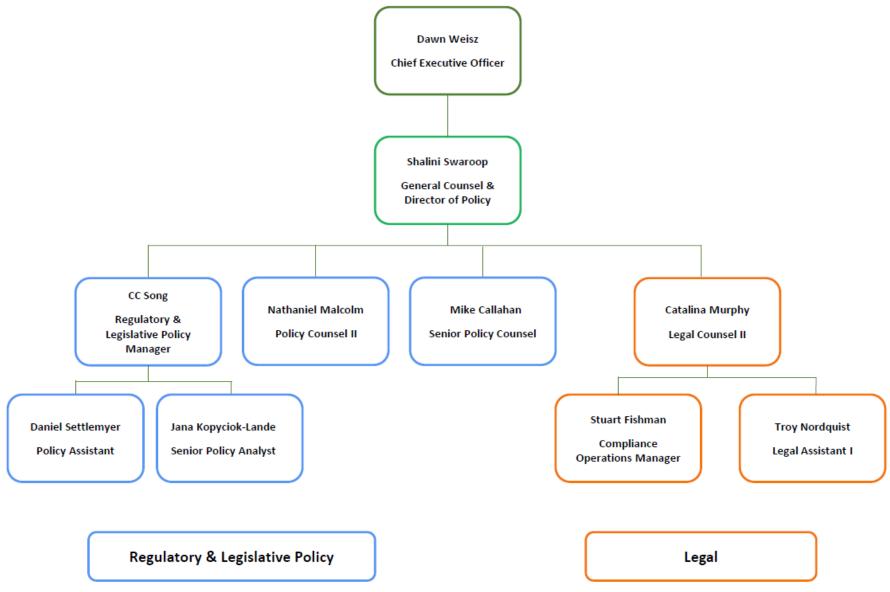


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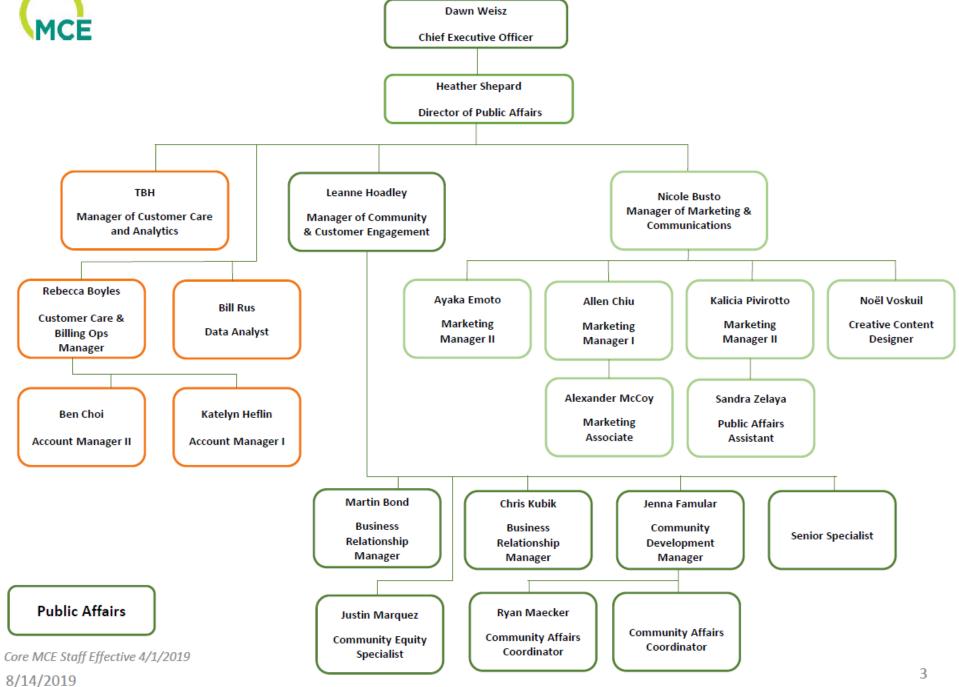




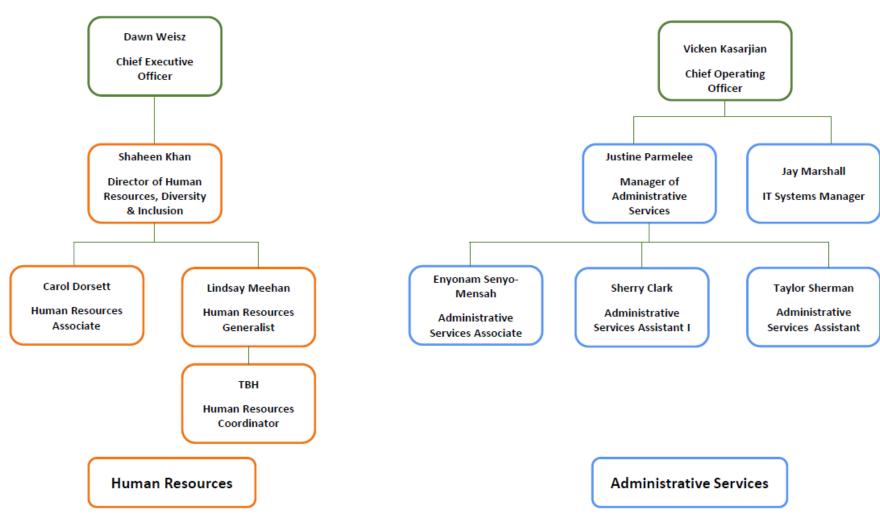


Core MCE Staff Effective 4/1/2019 8/14/201



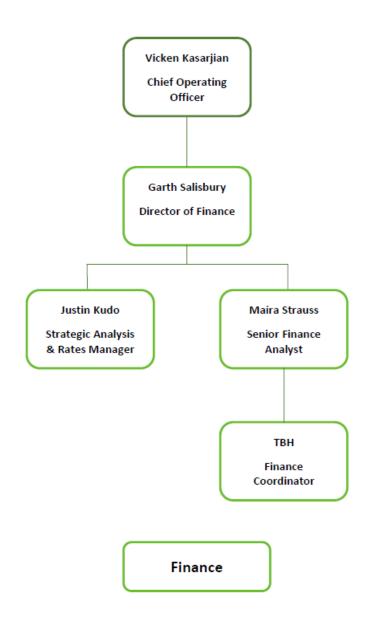




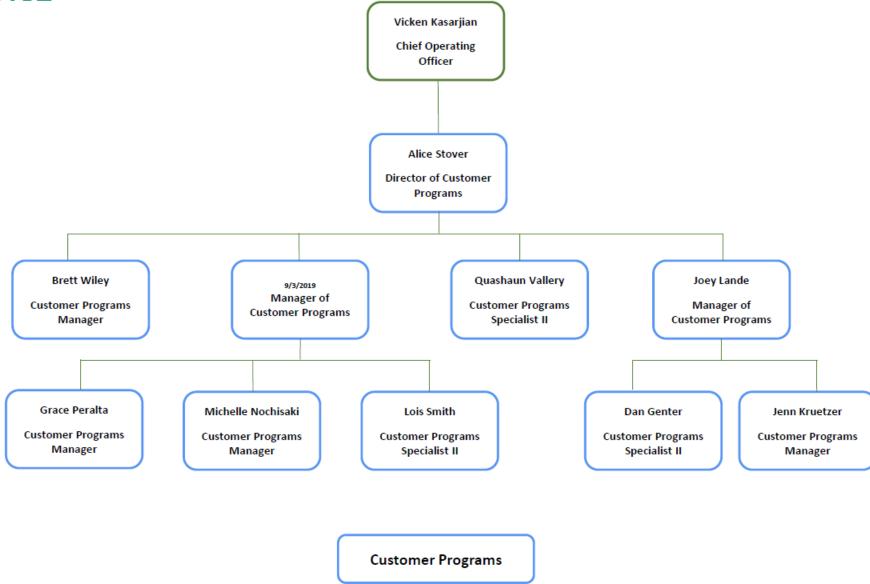


Core MCE Staff Effective 4/1/2019

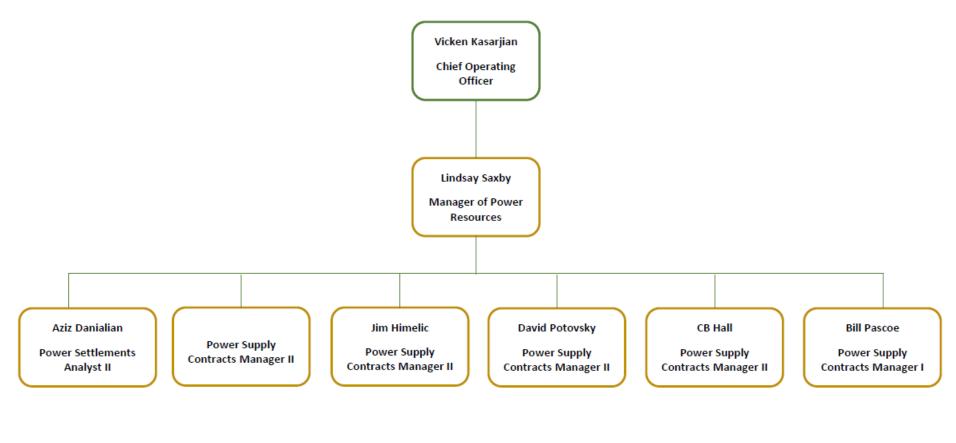












Power Resources

Appendix B: Supporting Information – Request I.B.

Functional Group	2018 EE Portfolio FTE	2020 EE Portfolio FTE
Policy, Strategy and Regulatory Reporting Compliance	1.70	1.85
Program Management	1.30	1.90
Engineering Services	-	-
Customer Application/Rebate/Incentive Processing	0.55	0.60
Customer Project Inspections	-	-
Portfolio Analytics	0.20	0.20
EM&V	0.35	0.45
ME&O	0.45	0.50
Account Management/Sales	-	-
IT	-	-
Call Center	-	-
Total	4.55	5.50

Aggregated Category	Definition	Functional Category	Detailed Definition
Policy, Strategy, and Regulatory Reporting Compliance	Includes p olicy, strategy, compliance, audits and regulatory support	Planning & Compliance	DSM Goal Planning; lead legislative review/positioning; policy support on reg proceedings; portfolio optimization; end use-market strategy; DSM lead for PRP, DRP, ES; locational targeting; audit support; SOX certifications; developing control plans; developing action plans; continuous monitoring; inspections; program/product QA/QC; decision compliance oversight/tracking; data requests; policies & procedures
		Company Regulatory Support	Case management for EE proceedings
Program management	_		
	and channel management for all sectors	Product Management	Manage end-to-end new products and services (P&S) intake, evaluation, and launch process; develop and facilitate P&S governance teams, coordination of all sub-process owners, stakeholders, and technical resources required to evaluate and launch new products; evaluate and launch new services and OOR opportunities; develop external partnerships & strategic alliances; work with various companies and associations to help advance standards, products, and tech.; work with external experts to help reduce MCE costs to deliver new prog. and products; develop and launch new customer technologies, products, services for residential and business customers; conduct customer pilots of new technologies and programs; lead customer field demonstrations of new technologies and products; align new P&S to savings programs/incentives; develop new programs/incentives in support of savings goals
		Channel Management	
		Contract Management	Budget forecasting, spend tracking, invoice processing, and contract management with vendors and suppliers; Regulatory support for ME&O activities
Engineering Services	Includes engineering, project management, and contracts associated with	Custom project support	Management of Emerging Products projects; Customized reviews; LCR/RFO support; Exante review management; Technical policy support; Technical assessments; Workpapers; Tool development; End use subject matter expertise
	workpaper development and pre/post sales project	Deemed workpapers	

	technical reviews and design assistance	Project management	
Customer Application/Rebat e and Incentive Processing	Costs associated with application management and rebate and incentive processing (deemed and custom)	Rebate & Application Processing	
Inspections	Costs associated with project inspections	Inspections	
Portfolio Analytics	Includes analytics support, including internal performance reporting and external reporting	Data analytics	Data development for programs, products and services; Standard and ad hoc data extracts for internal and external clients; Database management; CPUC, CAISO reporting; Data reconciliation; E3 support; Compliance filing support; Funding Oversight; ESPI support; Program Results Data & Performance
EM&V	EM&V expenditures	EM&V Studies	Program and product review; manage evaluation studies
		EM&V Forecasting	EE lead for LTPP and IEPR; market potential study; integration w/ procurement planning; CPUC Demand Analysis Working Group
ME&O	Costs associated with utility EE marketing; no	Marketing	Customer Programs, Products, and Services Marketing; Digital Product Development; Digital Content & Optimization
	statewide; focus on outsourced portion	Customer insights	Voice of the Customer; Customer satisfaction study measurement and analysis (JD Power, SDS); Customer testing/research
Account Management / Sales	Costs associated with account rep energy efficiency sales functions	Account Management	
IT	IT project specific costs and regular O&M	IT - project specific	Projects and minor enhancements. Includes project management/business integration ("PMO/BID"). Excluded: maintenance (which SCE defines as when something goes down, normal batch processing, verifying interfaces, etc.).
		IT - regular O&M	

Call Center	Costs associated with call center staff fielding EE program questions	Call Center	
Incentives	Costs of rebate and incentive payments to customers	Incentives	

Appendix C: Supporting Information – Request I.C.

Residential

			2018 EE Portfolio	2020 EE Portfolio Budget
Sector	Cost Element	Functional Group	Expenditures (\$Million)	(\$Million)
Residential	Labor(1)	Policy, Strategy, and Regulatory Reporting Compliance	\$ 0.040	\$ 0.12
		Program Management	\$ 0.120	\$ 0.37
		Engineering services	\$ -	
		Customer Application/Rebate/Incentive Processing	\$ 0.020	\$ 0.06
		Customer Project Inspections	\$ -	
		Portfolio Analytics	\$ 0.020	\$ 0.06
		ME&O (Local)	\$ -	
		Account Management / Sales	\$ -	
		IT	\$ -	
		Call Center	\$ -	
	Labor Total		\$ 0.200	\$ 0.622
		Third-Party Implementer (as defined per D.16-08-019, OP 10)		
		Local/Government Partnerships Contracts (3)		
		Other Contracts		
		Program Implementation	\$ 0.294	\$ 0.39
		Policy, Strategy, and Regulatory Reporting Compliance	\$ 0.017	\$ 0.02
		Program Management		\$ -
		Engineering services		\$ -
		Customer Application/Rebate/Incentive Processing	\$ 0.017	\$ 0.02
		Customer Project Inspections		\$ -
		Portfolio Analytics		\$ -
		ME&O (Local)	\$ 0.004	\$ 0.01
		Account Management / Sales		
		IT		
		Call Center		
		Facilities		
		Incentives(PA-implmeneted and Other Contracts Program Implementation) Program	\$ 0.163	\$ 1.10
		IncentivesThird Party Program (as defined per D.16-08-019, OP 10)		
	Non-Labor Total		\$ 0.496	\$ 1.542
Residential To	otal		\$ 0.695	\$ 2.163
	Other (collected through GRC) (2)	Labor Overheads		
Notes:	(1) Labor costs are already loaded wi	th (state loaders covered by EE)		
		n GRC (state current applicable decision)		
		rt the sector is included/not included in this item		

Commercial

			2018 EE Portfolio	2020 EE Portfolio Budget
Sector	Cost Element	Functional Group	Expenditures (\$Million)	(\$Million)
Commercial	Labor(1)	Policy, Strategy, and Regulatory Reporting Compliance	\$ 0.029	\$ 0.07
		Program Management	\$ 0.087	\$ 0.21
		Engineering services	\$ -	\$ -
		Customer Application/Rebate/Incentive Processing	\$ 0.015	\$ 0.03
		Customer Project Inspections	\$ -	\$ -
		Portfolio Analytics	\$ 0.015	\$ 0.03
		ME&O (Local)	\$ -	\$ -
		Account Management / Sales	\$ -	\$ -
		IT	\$ -	\$ -
		Call Center	\$ -	\$ -
	Labor Total		\$ 0.145	\$ 0.348
	Non-Labor	Third-Party Implementers Contracts (as defined per D.16-08-019, OP 10)	\$ -	\$ -
		Local/Government Partnerships Contracts (3)	\$ -	\$ -
		Other Contracts	\$ -	\$ -
		Program Implementation	\$ 0.215	\$ 0.59
		Policy, Strategy, and Regulatory Reporting Compliance	\$ 0.011	\$ 0.03
		Program Management	\$ -	\$ -
		Engineering services	\$ -	\$ -
		Customer Application/Rebate/Incentive Processing	\$ 0.011	\$ 0.03
		Customer Project Inspections	\$ -	\$ -
		Portfolio Analytics	\$ -	\$ -
		ME&O (Local)	\$ 0.005	\$ 0.01
		Account Management / Sales	\$ -	\$ -
		IT	\$ -	\$ -
		Call Center	\$ -	\$ -
		Facilities	\$ -	\$ -
		Incentives(PA-implmeneted and Other Contracts Program Implementation) Program	\$ 0.230	\$ 0.46
		IncentivesThird Party Program (as defined per D.16-08-019, OP 10)	-	\$ -
	Non-Labor Total		\$ 0.472	\$ 1.129
Commercial To	otal		\$ 0.617	\$ 1.477
	Other (collected through GRC) (2)	Labor Overheads		
Notes:	(1) Labor costs are already loaded wi	th (state loaders covered by EE)		
	(2) These costs are collected through	GRC (state current applicable decision)		
	(3) LGP contracts that directly support	rt the sector is included/not included in this item		

Industrial

			2018 EE Portfolio	2020 EE Portfolio Budget
Sector	Cost Element	Functional Group	Expenditures (\$Million)	(\$Million)
Industrial	Labor(1)	Policy, Strategy, and Regulatory Reporting Compliance	\$ -	\$ 0.10
		Program Management	\$ -	\$ 0.30
		Engineering services	\$ -	\$ -
		Customer Application/Rebate/Incentive Processing	\$ -	\$ 0.05
		Customer Project Inspections	\$ -	\$ -
		Portfolio Analytics	\$ -	\$ 0.05
		ME&O (Local)	\$ -	\$ -
		Account Management / Sales	\$ -	\$ -
		IT	\$ -	\$ -
		Call Center	\$ -	\$ -
	Labor Total		\$ -	\$ 0.501
	Non-Labor	Third-Party Implementers Contracts (as defined per D.16-08-019, OP 10)	\$ -	\$ -
		Local/Government Partnerships Contracts (3)	\$ -	\$ -
		Other Contracts	\$ -	\$ -
		Program Implementation	\$ -	\$ 0.94
		Policy, Strategy, and Regulatory Reporting Compliance	\$ -	\$ 0.05
		Program Management	\$ -	\$ -
		Engineering services	\$ -	\$ -
		Customer Application/Rebate/Incentive Processing	\$ -	\$ 0.05
		Customer Project Inspections	\$ -	\$ -
		Portfolio Analytics	\$ -	\$ -
		ME&O (Local)	\$ -	\$ 0.02
		Account Management / Sales	\$ -	\$ -
		IT	\$ -	\$ -
		Call Center	\$ -	\$ -
		Facilities	\$ -	\$ -
		Incentives(PA-implmeneted and Other Contracts Program Implementation) Programs	\$ -	\$ 0.57
		IncentivesThird Party Program (as defined per D.16-08-019, OP 10)	-	
	Non-Labor Total		\$ -	\$ 1.624
Industrial Tota	al		\$ -	\$ 2.125
	Other (collected through GRC) (2)	Labor Overheads		
Notes:	(1) Labor costs are already loaded w			
		n GRC (state current applicable decision)		
	(3) LGP contracts that directly suppo	rt the sector is included/not included in this item		

Agricultural

			2018 EE Portfolio	2020 EE Portfolio Budget
Sector	Cost Element	Functional Group	Expenditures (\$Million)	(\$Million)
Agricultural	Labor(1)	Policy, Strategy, and Regulatory Reporting Compliance	\$ -	\$ 0.03
		Program Management	\$ -	\$ 0.10
		Engineering services	\$ -	\$ -
		Customer Application/Rebate/Incentive Processing	\$ -	\$ 0.02
		Customer Project Inspections	\$ -	\$ -
		Portfolio Analytics	\$ -	\$ 0.02
		ME&O (Local)	\$ -	\$ -
		Account Management / Sales	\$ -	\$ -
		IT	\$ -	\$ -
		Call Center	\$ -	\$ -
	Labor Total		\$ -	\$ 0.162
	Non-Labor	Third-Party Implementers Contracts (as defined per D.16-08-019, OP 10)	\$ -	\$ -
		Local/Government Partnerships Contracts (3)	\$ -	\$ -
		Other Contracts	\$ -	\$ -
		Program Implementation	\$ -	\$ 0.29
		Policy, Strategy, and Regulatory Reporting Compliance	\$ -	\$ 0.02
		Program Management	\$ -	\$ -
		Engineering services	\$ -	\$ -
		Customer Application/Rebate/Incentive Processing	\$ -	\$ 0.02
		Customer Project Inspections	\$ -	\$ -
		Portfolio Analytics	\$ -	\$ -
		ME&O (Local)	\$ -	\$ 0.01
		Account Management / Sales	\$ -	\$ -
		IT	\$ -	\$ -
		Call Center	\$ -	\$ -
		Facilities	\$ -	\$ -
		Incentives(PA-implmeneted and Other Contracts Program Implementation) Program	\$ -	\$ 0.20
		IncentivesThird Party Program (as defined per D.16-08-019, OP 10)	-	
	Non-Labor Total		\$ -	\$ 0.525
Agricultural To	otal		\$ -	\$ 0.687
	Other (collected through GRC) (2)	Labor Overheads		
Notes:	(1) Labor costs are already loaded wi	ith (state loaders covered by EE)		
	(2) These costs are collected through	n GRC (state current applicable decision)		
	(3) LGP contracts that directly suppo	rt the sector is included/not included in this item		

Public Sector

			2018 EE Portfolio	2020 EE Portfolio Budget
Sector	Cost Element	Functional Group	Expenditures (\$Million)	(\$Million)
Public Sector	Labor(1)	Policy, Strategy, and Regulatory Reporting Compliance		
		Program Management		
		Engineering services		
		Customer Application/Rebate/Incentive Processing		
		Customer Project Inspections		
		Portfolio Analytics		
		ME&O (Local)		
		Account Management / Sales		
		IT		
		Call Center		
	Labor Total			
	Non-Labor	Third-Party Implementers Contracts (as defined per D.16-08-019, OP 10)		
		Local/Government Partnerships Contracts (3)		
		Other Contracts		
		Program Implementation		
		Policy, Strategy, and Regulatory Reporting Compliance		
		Program Management		
		Engineering services		
		Customer Application/Rebate/Incentive Processing		
		Customer Project Inspections		
		Portfolio Analytics		
		ME&O (Local)		
		Account Management / Sales		
		IT		
		Call Center		
		Facilities		
		Incentives(PA-implmeneted and Other Contracts Program Implementation) Program	ns	
		IncentivesThird Party Program (as defined per D.16-08-019, OP 10)		
	Non-Labor Total			
Public Sector T	otal			
	Other (collected through GRC) (2)	Labor Overheads		
Notes:	(1) Labor costs are already loaded wi	ith (state loaders covered by EE)		
	(2) These costs are collected through	n GRC (state current applicable decision)		
	(3) LGP contracts that directly suppo	rt the sector is included/not included in this item		

Cross Cutting

			2018 EE Portfolio	2020 EE Portfolio Budget
Sector	Cost Element	Functional Group	Expenditures (\$Million)	(\$Million)
Cross Cutting	Labor(1)	Policy, Strategy, and Regulatory Reporting Compliance	\$ 0.001	\$ 0.03
		Program Management	\$ 0.004	\$ 0.08
		Engineering services	\$ -	\$ -
		Customer Application/Rebate/Incentive Processing	\$ 0.001	\$ 0.01
		Customer Project Inspections	\$ -	\$ -
		Portfolio Analytics	\$ 0.001	\$ 0.01
		ME&O (Local)	\$ -	\$ -
		Account Management / Sales	\$ -	\$ -
		IT	\$ -	\$ -
		Call Center	\$ -	\$ -
	Labor Total		\$ 0.007	\$ 0.130
	Non-Labor	Third-Party Implementers Contracts (as defined per D.16-08-019, OP 10)	\$ -	\$ -
		Local/Government Partnerships Contracts (3)	\$ -	\$ -
		Other Contracts	\$ -	\$ -
		Program Implementation	\$ -	\$ -
		Policy, Strategy, and Regulatory Reporting Compliance	\$ 0.000	\$ 0.01
		Program Management	\$ 0.011	\$ 0.20
		Engineering services	\$ -	\$ -
		Customer Application/Rebate/Incentive Processing	\$ 0.000	\$ 0.01
		Customer Project Inspections	\$ -	\$ -
		Portfolio Analytics	\$ -	\$ -
		ME&O (Local)	\$ -	\$ -
		Account Management / Sales	\$ -	\$ -
		IT	\$ -	\$ -
		Call Center	\$ -	\$ -
		Facilities	\$ -	\$ -
		Incentives(PA-implmeneted and Other Contracts Program Implementation) Program	\$ -	\$ -
		IncentivesThird Party Program (as defined per D.16-08-019, OP 10)	=	\$ -
	Non-Labor Total		\$ 0.012	\$ 0.217
Cross Cutting	Гotal		\$ 0.019	\$ 0.347
J	Other (collected through GRC) (2)	Labor Overheads		
Notes:	(1) Labor costs are already loaded wi	th (state loaders covered by EE)		
		GRC (state current applicable decision)		
		t the sector is included/not included in this item		

Appendix D: Supporting Information – Response to Scoping Memo, Attachment A, Question C.8.

Energy Savings Targets and Expenditures by Sector

		2018 EE Portfolio Expenditures (\$Million)								2020 EE Portfolio Budget (\$Million)							201	8 EE Portfolio	Savings	2020 EE Portfolio Forecasted Savings			
Sector		Labor	(€	n-Labor excl. entives)	Inc	entives		Total		Labor	(€	-Labor excl. ntives)	Ind	centives		Total	Net KWH	Net KW	NET MMTHERMS	NET KWH	NET KW	NET MMTHERMS	
Residential	\$	0.200	\$	0.332	\$	0.163	\$	0.695	\$	0.622		0.440	\$	1.102	\$	2.163	336,227	27	0.071	5,087,595	539	0.239	
Commercial	\$	0.145	\$	0.242	\$	0.230	\$	0.617	\$	0.348	\$	0.669	\$	0.460	\$	1.477	823,364	126	(0.001)	3,164,164	524	0.020	
Agricultural	\$		\$	-	\$	-	\$	-	\$	0.162	\$	0.326	\$	0.199	\$	0.687	-	-	-	1,040,037	224	0.025	
Industrial	\$	-	\$	-	\$	-	\$	-	\$	0.501	\$	1.058	\$	0.567	\$	2.125	-	-	-	2,150,599	340	0.268	
Public (GP)	\$	-	\$	-	\$	-	\$	-	\$		\$	-	\$	-	\$	-	-	-	-	-	-	-	
Cross Cutting*	\$	0.007	\$	0.012	\$	-	\$	0.019	\$	0.130	\$	0.217	\$	-	\$	0.347	-	-	-	-	-	-	
Total Sector Budget	\$	0.352	\$	0.586	\$	0.393	\$	1.331	\$	1.763	\$	2.710	\$	2.327	\$	6.800	1,159,591	153	0.070	11,442,395	1,628	0.553	
EM&V-PA	\$	-	\$		\$	-	\$	0.017	\$	-	\$	-	\$	-	\$	0.109	-	-	-	-	-	-	
EM&V-ED	\$	-	\$		\$	-	\$	-	\$	-	\$	-	\$	-	\$	0.163	-	-	-	-	-	-	
OBF - Loan Pool**	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	-	-	-	-	-	-	
EE Total	\$	0.352	\$	0.586	\$	0.393	\$	1.348	\$	1.763	\$	2.710	\$	2.327	\$	7.072	1,159,591	153	0.070	11,442,395	1,628	0.553	
* Cross Cutting Sector in	Cross Cutting Sector includes Codes & Standards, Emerging Technologies, Workforce Education & Training, Financing.																						
** For SDG&E and SCG t	or SDG&E and SCG the loan pool is not part of the authorized EE portoflio budget and is collected and tracked trhough a separate balancing account.																						

^{**} For SDG&E and SCG the loan pool is not part of the authorized EE portoflio budget and is collected and tracked trhough a separate balancing account.

Appendix E: Supporting Information – Response to Scoping Memo, Attachment A, Question C.9.

Energy Efficiency In-House Budget by Sector and Cross-Cutting

		2018	EE P	ortfolio Exp	ditures (\$Mi	n)	2020 EE Portfolio Budget (\$Million)									
Sector	Labor		Non-Labor (excl. Incentives)		Incentives		Total		Labor		Non-Labor (excl. Incentives)		Incentives		Total	
Residential	\$	0.200	\$	0.332	\$	0.163	\$	0.695	\$	0.622	\$	0.440	\$	1.102	\$	2.163
Commercial	\$	0.145	\$	0.242	\$	0.230	\$	0.617	\$	0.348	\$	0.669	\$	0.460	\$	1.477
Agricultural	\$	-	\$	-	\$	-	\$	-	\$	0.162	\$	0.326	\$	0.199	\$	0.687
Industrial	\$	-	\$	-	\$	-	\$	-	\$	0.501	\$	1.058	\$	0.567	\$	2.125
Public (GP)	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
Cross Cutting*	\$	0.007	\$	0.012	\$	-	\$	0.019	\$	0.130	\$	0.217	\$	-	\$	0.347
Total Sector Budget	\$	0.352	\$	0.586	\$	0.393	\$	1.331	\$	1.763	\$	2.710	\$	2.327	\$	6.800
EM&V-PA	\$	-	\$	-	\$	-	\$	0.017	\$	-	\$	-	\$	-	\$	0.109
EM&V-ED	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	0.163
OBF - Loan Pool**	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
EE Total	\$	0.352	\$	0.586	\$	0.393	\$	1.348	\$	1.763	\$	2.710	\$	2.327	\$	7.072

Attachment 2: Marin Clean Energy CEDARS Filing Submission Receipt

CEDARS FILING SUBMISSION RECEIPT

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

PA: Marin Clean Energy (MCE)

Filing Year: 2020

Submitted: 14:36:49 on 04 Sep 2019

By: Qua Vallery

Advice Letter Number: 37-E

* Portfolio Filing Summary *

- TRC: 1.0067 - PAC: 1.0537

- TRC (no admin): 2.866 - PAC (no admin): 3.2826

- RIM: 1.0537

- Budget: \$6,908,519.27

- * Programs Included in the Filing *
- MCE01: Multi-Family
- MCE02: Small Commercial
- MCE03: Single Family Seasonal Savings
- MCE05: Multifamily Direct Install Standalone
- MCE07: Single Family Comprehensive
- MCE08: Single Family Direct Install Standalone
- MCE10: Industrial
- MCE11: Agricultural
- MCE16: Workforce Education and Training (WET)
- MCE98: MCE EM&V;