

March 17, 2016

CA Public Utilities Commission  
Energy Division  
Attention: Energy Efficiency Branch  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, CA 94102-3298



**Advice Letter 15-E**

**Re: Request for Approval to Shift Funds in Anticipation of 2016 Spending**

In compliance with the California Public Utilities Commission's ("Commission") Decision ("D.") 09-09-047, Ordering Paragraph ("OP") 43, filed September 24, 2009 and the Energy Efficiency Policy Manual,<sup>1</sup> Marin Clean Energy ("MCE") submits this filing to request a fund shift among MCE's programs to accommodate anticipated spending for 2016.

**Effective Date:** April 17, 2016

**Tier Designation:** Tier 2

Pursuant to General Order 96-B, Energy Industry Rule 5.2 this advice letter is submitted with a Tier 2 designation.

**Purpose**

The purpose of this advice filing is to seek approval fund shift among MCE's programs to accommodate anticipated spending for 2016.

**Background**

MCE's energy efficiency programs have ramped up over the three years since the current program cycle was launched with D.12-11-015. Through this time, MCE made changes to its programs and requested fund shifting via advice letters as needed to ensure the appropriate apportionment of budget across the programs. As MCE is planning for 2016 program activity, some fund shifting within the budget is required to account for changes in program delivery.

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<sup>1</sup> Version 5, July 2013, Section II.7 at p. 13, available at <http://www.cpuc.ca.gov/NR/rdonlyres/7E3A4773-6D35-4D21-A7A2-9895C1E04A01/0/EEPPolicyManualV5forPDF.pdf>.

## **Fund Shifting for MCE’s 2016 Budget**

Four primary factors are driving this request for fund shifting: (1) MCE closed its Single Family On-Bill Repayment option in the Financing Program;<sup>2</sup> (2) MCE suspended the Home Utility Reports (“HURs”) component of the Single Family Program; (3) MCE adjusted incentive levels in the Small Commercial program to match Pacific Gas and Electric Company’s (“PG&E”) incentive realignment;<sup>3</sup> and (4) MCE’s Multi-Family Program is gaining traction. The proposed fund shifts are included in Table 2 below.

**Table 2: Requested Fund Shifts in MCE’s 2016 Budget**

<b>MCE Programs</b>	<b>Approved 2016<sup>4</sup></b>	<b>Fund Shifts</b>	<b>Final 2016</b>
Single Family	\$264,402*	(\$31,352)	\$233,050
Multi-Family	\$423,486	\$61,029	\$484,515
Small Commercial	\$432,379	\$43,292	\$475,671
Financing	\$100,000	(\$72,969)	\$27,031
<b>Total</b>	<b>\$1,220,267</b>	<b>-</b>	<b>\$1,220,267</b>

\*This figure was erroneously reported at \$264,400 in MCE AL 8-E-A.

MCE closed the Single Family On-Bill Repayment option within the Financing Program with MCE Advice Letter 10-E. This closure means the Financing Program requires a smaller budget. This reduced budget will be used to continue to support and drive enrollment in the Multi-Family and Small Commercial On-Bill Repayment option and in leveraging Property Accessed Clean Energy (“PACE”) programs for customers.

The residential evaluation conducted by DNV-GL on MCE’s single family HURs found no savings associated with this activity.<sup>5</sup> MCE has thus suspended the HURs component of the Single Family Program. MCE is currently working to analyze the results of the assessment and align program design with the report findings. However, MCE determined it would be prudent to suspend the program until the issues raised in the assessment are fully understood and addressed. Thus, funds associated with the HUR activity are proposed to be shifted out of the Single Family Program. The remaining Single Family Program budget will support the single family residential web tool, which currently has close to 2,000 registered users and is supporting the roll out of the Cool California challenge in MCE service territory.

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<sup>2</sup> MCE AL 10-E.

<sup>3</sup> In Q4 of 2015, PG&E notified MCE that it would be realigning incentives in the PG&E non-residential portfolio. This decision impacted a small business direct install program jointly administered between PG&E and MCE.

<sup>4</sup> MCE’s budget was approved in D.14-10-046, and subsequently updated in compliance filing MCE AL 8-E-A.

<sup>5</sup> The residential behavioral programs assessment is in draft form as of the date of this advice letter:

[http://www.energydataweb.com/cpucFiles/pdaDocs/1445/Res3\\_4\\_MCE\\_HURS2014\\_FINALdraft\\_forPublicComments.pdf](http://www.energydataweb.com/cpucFiles/pdaDocs/1445/Res3_4_MCE_HURS2014_FINALdraft_forPublicComments.pdf).

MCE administers the Small Commercial Program jointly with PG&E. In late 2015, PG&E informed MCE of its decision to adjust incentive levels for the program based on a portfolio-wide incentive realignment. After considering alternatives, MCE determined the best course of action to support small commercial customers would be to prevent confusion and increase MCE's incentive levels to remain consistent with PG&E. These additional incentives require funds to be shifted into the Small Commercial Program.

MCE's Multi-Family Program has experienced tremendous growth since it was launched in 2013. The program was oversubscribed in 2015 and MCE anticipates the Multi-Family Program activity to be similarly robust in 2016 based on the current program pipeline. Thus, MCE is requesting to shift funds into the Multi-Family Program budget.

### **Notice**

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, California 94102  
E-mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

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

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

Michael Callahan-Dudley  
Regulatory Counsel  
MARIN CLEAN ENERGY  
1125 Tamalpais Avenue  
San Rafael, CA 94901  
Phone: (415) 464-6045  
Facsimile: (415) 459-8095  
E-mail: [mcallahan-dudley@mceCleanEnergy.org](mailto:mcallahan-dudley@mceCleanEnergy.org)

and

Beckie Menten  
Energy Efficiency Director  
MARIN CLEAN ENERGY  
1125 Tamalpais Avenue  
San Rafael, CA 94901  
Phone: (415) 464-6034  
Facsimile: (415) 459-8095  
E-mail: [bmenten@mceCleanEnergy.org](mailto:bmenten@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.

MCE is serving copies of this advice filing to the relevant parties shown on the R.13-11-005 service list. For changes to this service list, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

### **Correspondence**

For questions, please contact Michael Callahan-Dudley at (415) 464-6045 or by electronic mail at [mcallahan-dudley@mceCleanEnergy.org](mailto:mcallahan-dudley@mceCleanEnergy.org).

/s/ Michael Callahan-Dudley

Michael Callahan-Dudley  
Regulatory Counsel  
MARIN CLEAN ENERGY

cc: Service List R.13-11-005

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

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

Marin Clean Energy

Utility type:

ELC

GAS

PLC

HEAT

WATER

Michael Callahan-Dudley

Phone #: 415-464-6045

E-mail: [mcallahan-dudley@mceCleanEnergy.org](mailto:mcallahan-dudley@mceCleanEnergy.org)

### EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL): 15-E

Subject of AL: Request for Approval to Shift Funds in Anticipation of 2016 Spending

Tier Designation:  1  2  3

Keywords (choose from CPUC listing):

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution: N/A

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL \_\_\_\_\_

Summarize differences between the AL and the prior withdrawn or rejected AL<sup>1</sup>: \_\_\_\_\_

Resolution Required?  Yes  No

Requested effective date: April 17, 2016

No. of tariff sheets:

Estimated system annual revenue effect: (%):

Estimated system average rate effect (%):

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

Tariff schedules affected:

Service affected and changes proposed<sup>1</sup>:

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 filing, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division

Attention: Tariff Unit

505 Van Ness Ave.,

San Francisco, CA 94102

[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Utility Info (including e-mail)

Marin Clean Energy

Michael Callahan-Dudley, Regulatory Counsel

(415) 464-6045

[mcallahan-dudley@mceCleanEnergy.org](mailto:mcallahan-dudley@mceCleanEnergy.org)

<sup>1</sup> Discuss in AL if more space is needed.