

November 20, 2017

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



Advice Letter 28-E

Re: Request for Approval to Shift Funds to Marin Clean Energy’s Financing Program

In compliance with California Public Utilities Commission (“Commission”) Decision (“D.”) 09-09-047, Ordering Paragraph (“OP”) 43, filed September 24, 2009, and the Energy Efficiency Policy Manual,¹ Marin Clean Energy (“MCE”) submits this filing to request authority to shift funds between MCE’s Small Commercial Program and its Financing Program to accommodate anticipated spending for the remainder of 2017.

Effective Date: December 20, 2017

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 letter filing is to seek approval to shift funds from MCE’s Small Commercial Program to its Financing Program to accommodate anticipated spending for the remainder of 2017.

Background

MCE currently administers a Financing Program as part of its Energy Efficiency portfolio. The Financing Program has historically included Single Family, Multifamily, and Commercial On-Bill Repayment (“OBR”) components to provide MCE customers with low-cost financing options to complete energy efficiency improvements to their homes or businesses.² Currently, MCE’s Financing Program supports participation in Property Assessed Clean Energy (“PACE”)

¹ 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/EEPolicyManualV5forPDF.pdf>.

² MCE Single Family, Multifamily, and Small Commercial OBR program closures were approved by the Commission pursuant to MCE Advice Letters 10-E and 24-E.

programs. To better serve ratepayer interests, MCE is analyzing metered energy data to understand the energy savings associated with PACE projects within Marin County. MCE’s Financing Program requires additional funding associated with this analysis through 2017.

Financing Program Activity

MCE’s PACE analysis work will give MCE insight into PACE project performance and improve MCE’s ability to advise and inform current and potential PACE participants. MCE proposes to shift funds into its Financing Program budget to accommodate the PACE analysis because the current Financing Program budget is insufficient to cover the scope of work for this activity through 2017. Some of these funds will be committed to be spent in 2018 because it is anticipated that the contracted activity will continue into 2018.

Fund Shifting for MCE’s 2017 Budget

MCE requests authority to shift funds from its Small Commercial Program to its Financing Program to support the Financing Program’s expenditures for implementation activities through the end of 2017. MCE’s Small Commercial program is anticipated to otherwise have remaining funds at the end of 2017 sufficient to accommodate the proposed fund shift. The proposed fund shift is illustrated in Table 1 below.

Table 1: Requested Fund Shift in MCE’s 2017 Budget

Program	2017 Budget	Shift Out	Shift In	New Budget
Small Commercial Energy Efficiency	\$937,461 ³	(\$22,500)		\$914,961
Financing	\$27,031 ⁴		\$22,500	\$49,531
Total	\$964,492	(\$22,500)	\$22,500	\$964,492

Conclusion

MCE requests authorization to shift \$22,500 out of MCE’s Small Commercial Program and into its Financing Program.

³ This Small Commercial Program budget is \$5,000 more than the budget reflected in Commission-approved Advice Letter 24-E (\$932,461). Subsequent to Commission approval of Advice Letter 24-E, MCE shifted \$5,000 into MCE’s Small Commercial budget. The fund shift did not trigger the 15% rule. As such, MCE did not file an advice letter.

⁴ This is the Financing Program budget pursuant to Commission-approved MCE Advice Letter 24-E.

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

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:

Nathaniel Malcolm
Policy Counsel
MARIN CLEAN ENERGY
1125 Tamalpais Avenue
San Rafael, CA 94901
Phone: (415) 464-6045
Facsimile: (415) 459-8095
E-mail: nmalcolm@mceCleanEnergy.org

and

Alice Stover
Manager of Customer Programs, Policy, and Planning
Marin Clean Energy
1125 Tamalpais Ave.
San Rafael, CA 94901
Phone: (415) 464-6030
Facsimile: (415) 459-8095
astover@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.

Correspondence

For questions, please contact Nathaniel Malcolm at (415) 464-6048 or by electronic mail at nmalcolm@mceCleanEnergy.org.

/s/ Nathaniel Malcolm

Nathaniel Malcolm
Policy Counsel
MARIN CLEAN ENERGY

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

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

Nathaniel Malcolm, Policy Counsel, Marin Clean Energy

Phone #: 415-464-6048

E-mail: nmalcolm@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): 28-E

Subject of AL: Request for Approval to Shift Funds to Marin Clean Energy's Financing Program

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 No

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

Resolution Required? Yes No

Requested effective date: December 20, 2017

No. of tariff sheets: N/A

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

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

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

Utility Info (including e-mail)
Marin Clean Energy
Nathaniel Malcolm, Policy Counsel
(415) 464-6048
nmalcolm@mceCleanEnergy.org

¹ Discuss in AL if more space is needed.