

August 1, 2018

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



MCE Advice Letter 32-E; PG&E Advice Letter 4000-G/5347-E (ID U39 M)

Re: Marin Clean Energy’s and Pacific Gas and Electric Company’s Annual Joint Memorandum of Cooperation for Program Year 2019

Pursuant to Decision (“D.”) 18-05-041, *Decision Addressing Energy Efficiency Business Plans*, Ordering Paragraph (“OP”) 38, Marin Clean Energy (“MCE”) hereby submits its Annual Joint Memorandum of Cooperation for Program Year 2019 (“Joint Cooperation Memo”) with Pacific Gas and Electric Company (“PG&E”) as Advice Letter (“AL”) MCE 32-E; PG&E 4000-G/5347-E.¹

Tier Designation

This AL has a Tier 2 designation pursuant to OP 38 of D.18-05-041, which requires MCE and PG&E to submit their first annual Joint Cooperation Memo no later than August 1, 2018 as a Tier 2 advice letter.

Effective Date

Pursuant to General Order 96-B, MCE and PG&E respectfully request that this Tier 2 AL become effective on August 31, 2018, which is 30 calendar days from the date of this filing.

Background

On January 17, 2017, MCE and PG&E filed their respective business plans with the California Public Utilities Commission (“Commission”).² On June 5, 2018, the Commission issued D.18-05-041 approving the aforementioned business plans.³ The Commission granted MCE’s and PG&E’s sector-level proposals for the following overlapping sectors: (1) Residential, single family; (2)

¹ D.18-05-041, OP 38 at p. 190.

² See Application of Pacific Gas and Electric Company for Approval of 2018-2025 Rolling Portfolio Energy Efficiency Business Plan and Budget (Application (“A.”) 17-01-015) filed January 17, 2017; see also Application of Marin Clean Energy for Approval of its Energy Efficiency Business Plan (A.17-01-017) filed January 17, 2017.

³ See D.18-05-041.

Residential, multifamily; (3) Commercial; (4) Industrial; (5) Agricultural; and (6) Workforce Education and training.⁴

In granting MCE's business plan, the Commission emphasized the potential for MCE and PG&E program overlap. The Commission noted, however, the difficulty in identifying program overlap because the business plans appropriately focus on sector-level strategies, not specific programmatic activities.⁵ Therefore, to identify areas of program overlap, the Commission directed all Program Administrators ("PA") with overlapping service territories to develop an annual Joint Cooperation Memo to "summar[ize] the areas of potential overlap in their portfolios and the manner in which they will coordinate and collaborate during the business plan period."⁶

Submission and approval of an annual Joint Cooperation Memo is a prerequisite for consideration of MCE's and PG&E's Annual Budget Advice Letters ("ABAL").⁷

Purpose

This AL provides Commission staff with the Joint Cooperation Memo executed by and between MCE and PG&E as required by OP 38 of D.18-05-041. The Joint Cooperation Memo is included with this AL as Attachment 1.

The Joint Cooperation Memo describes the energy efficiency programs that MCE and PG&E anticipate offering in their shared service area in Program Year 2019 pursuant to their approved business plans. The Joint Cooperation Memo provides a summary of MCE's programs and, if PG&E offers a similar program, PG&E's programs, and describes how MCE and PG&E will coordinate to inform customers of all available program offerings.

Conclusion

PG&E and MCE respectfully submit the Joint Cooperation Memo pursuant to OP 38 of D.18-05-041 and request Commission approval of same.

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@cpuc.ca.gov.

⁴ *See id.*

⁵ *Id.* at p. 111.

⁶ *Id.*

⁷ *Id.*, OP 39 at p. 191.

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:

Michael Callahan
Policy Counsel
MARIN CLEAN ENERGY
1125 Tamalpais Ave.
San Rafael, CA 94901
Phone: (415) 464-6045
Facsimile: (415) 459-8095
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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 Michael Callahan at (415) 464-6045 or by electronic mail at nmalcolm@mceCleanEnergy.org.

/s/ Michael Callahan

Michael Callahan
Policy Counsel
MARIN CLEAN ENERGY

cc: Service Lists: R.13-11-005; A17-01-013, *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; Pacific Gas and Electric Company (ID U39 M)

Utility type:

ELC GAS
 PLC HEAT WATER

Michael Callahan, Policy Counsel, MCE

Phone #: 415-464-6045

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EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL): MCE 32-E; PG&E 4000-G/5347-E

Subject of AL: Marin Clean Energy's and Pacific Gas and Electric Company's Annual Joint Memorandum of Cooperation for Program Year 2019

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: Decision 18-05-041, Ordering Paragraph 38.

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: August 31, 2018

No. of tariff sheets: N/A

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

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

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

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
Michael Callahan, Policy Counsel
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¹ Discuss in AL if more space is needed.

Attachment 1

MCE and PG&E Joint Cooperation Memo

PG&E and MCE held an in-person meeting in late June to discuss coordination between overlapping programs. Additionally, program managers for both PAs talked over the phone several times regarding information within this memo. Information herein describes coordination for programs currently being implemented. Both PG&E and MCE are fielding bids for future programs to launch in 2019 and will continue discussions once programs are designed. These potential future programs are not included in this memo because details are not yet determined.

This attachment has five sections:

- I. Commercial Program Information
- II. Residential Program Information
- III. Coordination (for both sectors)
- IV. MCE Programs to be launched in 2019 with coordination to be revisited
- V. Double dipping prevention procedure

I.A. SUMMARY OF PROGRAMS THAT OVERLAP WITH MCE COMMERCIAL PROGRAMS

Table 1. Commercial Sector: MCE and Comparable IOU Programs

Program ID	Program Name	Sector	Budget ¹	Resource / Non-Resource	Measures											
					Lighting	Appliances	HVAC	Plug Load	Refrigeration	Custom	Lighting Controls	HVAC Controls	Whole Building	Water Heaters	Other	
MCE																
MCE02	MCE Commercial Upgrade Program	Commercial	\$783,593	Resource	X	X	X	X	X	X	X	X	X	X	X	X
IOU (comparable programs)																
PGE21011	Commercial Calculated Incentives	Statewide	\$23,262,758	Resource	X	X	X		X	X	X	X	X			X

¹ PG&E's and MCE's budgets are based on 2018 program budgets. These budgets are subject to change once the 2019 ABAL is finalized.

Program ID	Program Name	Sector	Budget ¹	Resource / Non-Resource	Measures										
					Lighting	Appliances	HVAC	Plug Load	Refrigeration	Custom	Lighting Controls	HVAC Controls	Whole Building	Water Heaters	Other
PGE21012	Commercial Deemed Incentives	Statewide	\$19,367,904	Resource	X	X	X	X	X			X		X	X
PGE210119	LED Accelerator	Commercial	\$2,995,445	Resource	X						X				
PGE210123	Healthcare Energy Efficiency Program	Commercial	\$2,244,672	Resource	X		X		X	X	X	X	X	X	X
PGE210143	Hospitality Program	Commercial	\$12,626,882	Resource	X		X		X	X	X				
PGE21015	Commercial HVAC	Statewide	\$10,626,958	Resource			X					X			
PGE21018	EnergySmart Grocer	Commercial	\$6,672,373	Resource	X		X		X	X		X			X
PGE211009	East Bay	Commercial	\$6,129,105	Resource	X				X						
PGE211013	Marin County	Commercial	\$1,271,550	Resource	X				X						
PGE211015	Napa County	Commercial	\$557,007	Resource	X				X						
PGE211029	Solano County	Commercial	\$1,480,725	Resource	X				X						

I.B. PROGRAM SUMMARIES AND COORDINATION OF MCE AND COMPARABLE IOU COMMERCIAL PROGRAMS

This section includes a summary of the programs listed in the table above and the planned MCE/PG&E coordination.

a) MCE Program(s)

MCE02, MCE Commercial Upgrade Program

- The program targets Commercial customers in MCE's service area. Its primary objectives are to facilitate the uptake of high quality energy efficiency projects, and improve the technical capability, pricing and program experience of both customers and the local contractor community. The program aims to achieve these objectives through a customer and contractor-friendly project assessment platform, competitive bidding, project management, access to training and certifications for contractors as well as discounted pricing via a bulk purchasing mechanism. The program also aims to track the installation equipment that can integrate with automated demand response signals, as well as energy savings impacts at the meter (as a reference point against deemed and custom savings calculations and potentially as a basis for Normalized Metered Energy Consumption (NMEC) savings claims). Measures include interior and exterior LED luminaires and lamps, networked lighting controls, connected thermostats, HVAC equipment, advanced rooftop controllers, ductless heat pumps, heat pump water heaters and other measures which may apply to customers in retail, office, and other nonresidential building types.

b) Comparable IOU Program(s)

PGE21011: Commercial Calculated (Statewide)

- PG&E implements the Statewide Commercial Calculated program for customers in its territory. The program provides financial incentives for non-residential customers to install new equipment or systems that exceed applicable code and/or industry standards in existing buildings. PG&E's Calculated program includes both customized incentives (formerly "Customized Retrofit") and Retro-commissioning (RCx) offerings. RCx represents an important element of PG&E's EE toolkit by reducing energy usage and optimizing the efficiency of mechanical equipment, lighting, and control systems to current standards in existing facilities. To these ends, PG&E offers financial and technical assistance for customers to undertake RCx projects and implement measures that improve facility operations.

PGE21012: Commercial Deemed Incentives (Statewide)

- PG&E implements the Statewide Commercial Deemed Incentives (Deemed) program for customers in its territory. The program offers prescriptive rebates directly to customers, vendors, or distributors for the installation or sale of energy-efficient equipment. The program offers a broad array of measures across technology segments including lighting, HVAC, food service, refrigeration, and water heating. This program is offered to all customer segments and sizes.

PGE210119: LED Accelerator

- LED Accelerator encourages large commercial retail customers to install best-in-class LEDs with the goal of increasing the quality of LEDs offered to the broader market over time. The program offers three tiers of equipment specifications and incentives, helping create a market for manufacturers' best-in-class products and enabling customers to overcome cost barriers associated with more expensive offerings. As sales volumes of the best-in-class products increase, the associated product costs decrease, and products with higher efficacy and better light quality become readily available to the general market.

PGE210123: Healthcare Energy Efficiency

- The Healthcare Energy Efficiency Program (HEEP) provides hospital facilities (medical office buildings and acute care facilities) a wide range of support services to address barriers to EE. HEEP delivers electric and gas savings through retrofits (deemed and calculated) and RCx services.

PGE210143: Hospitality

- PG&E's Hospitality program offers a comprehensive list of EE measures and services to hospitality customers with annual peak demand above 100 kW or that have ten or more locations within PG&E's territory. The program offers both custom and deemed measures, and assists customers with EE projects from start to finish.

PGE21015: Commercial HVAC (Statewide)

- PG&E implements the Statewide Commercial HVAC program for customers in its territory. The program is comprised of three elements that enable market transformation, direct energy savings, and demand reductions: Upstream HVAC Equipment Incentives, Commercial Quality Installation, and midstream Commercial Quality Maintenance (C-QM). This program is designed for commercial rooftop units powered by electricity from PG&E.

PGE21018: Energy Smart Grocer

- The Energy Smart Grocer program provides comprehensive EE services for medium to large grocery stores and supermarkets with annual peak demand above 70kW and those with multi-plex refrigeration systems. The program provides comprehensive energy audits, long-term energy planning, and support for the implementation of efficiency measures.

Regional Direct Install: PGE211009-East Bay; PGE211013-Marin; PGE211015-Napa; PGE211029-Solano

- Regional Direct Install programs serve small and medium business (SMB) customers with annual peak demand below 200 kW. Through this offering, SMBs benefit from a high level of technical assistance and turnkey installation of lighting, refrigeration, and HVAC control measures whereby the incentive payment is incorporated into to the project proposal. These programs are implemented by either 3rd parties or local government partnerships.

II.A. SUMMARY OF PROGRAMS OFFERED FOR 2019 THAT OVERLAP WITH MCE RESIDENTIAL PROGRAMS

The only residential programs offered in 2019 that are currently designed and overlap are the MCE and PG&E multifamily programs. PG&E has no comparable program to the MCE single family seasonal savings program. Both MCE and PG&E will have residential programs that may launch in 2019 (and there may be statewide programs as well), but there is insufficient detail on possible design and therefore no ability to determine needed coordination. These expected programs launching in 2019 are listed in Section III of this attachment.

Table 2. Residential Sector: MCE and Comparable IOU Programs

Program ID	Program Name	Sector	Budget ²	Resource / Non-Resource	Measures										
					Lighting	Appliances	HVAC	Plug Load	Refrigeration	Custom	Lighting Controls	HVAC Controls	Whole Building	Water Heaters	Other
MCE															
MCE01	Multifamily Comprehensive Program	Residential	\$1,126,000	Resource	X	X	X	X		X	X	X	X	X	
MCE03	Single Family Seasonal Savings Program	Residential	\$109,000	Resource								X			
IOU (comparable programs)															
PGE21003	Multifamily Upgrade Program	Residential	\$7,500,000	Resource									X		
PGE210011	Residential Energy Fitness (MIDI Subprogram)	Residential	\$3,000,000	Resource	X		X	X			X	X		X	

² PG&E’s and MCE’s budgets are based on 2018 program budgets. These budgets are subject to change once the 2019 ABAL is finalized.

II.B. PROGRAM SUMMARIES AND COORDINATION OF MCE AND COMPARABLE IOU RESIDENTIAL PROGRAMS

a) MCE Program(s)

MCE01, MCE Multifamily Comprehensive Program

- The program targets Multifamily properties in MCE's service area. Its primary objectives are to reduce participation barriers by guiding property owners through the process to create long-term project plans, coordinating upgrade timing with key trigger points, such as at unit turnover, offer a Single Point of Contact (SPOC) to guide property owners through the process of participating and technical assistance to help them understand the energy and resource conservation options that are a good fit for their property, offering rebates and direct install of free in-unit measures to address barriers related to equipment cost and split incentives. Measures include interior and exterior LED lighting, Energy Star appliances, HVAC equipment, networked lighting controls, water heaters, and other measures.

MCE03, MCE Seasonal Savings Program

- This program targets Smart thermostat owners in MCE's service area. Seasonal Savings is a software algorithm that offers customers the opportunity to make their cooling and heating schedules more efficient through a series of small adjustments to scheduled temperatures over a three-week period. Customers are offered the program on their thermostat and through a phone app and must opt-in to participate. There is currently no concern of program or measure overlap because PG&E is not offering a comparable program within MCE service area.

b) Comparable IOU Program(s)

PGE 210011- Residential Energy Fitness (MIDI Subprogram)

- The MIDI program is available to qualified renters and homeowners living in single-family homes, multifamily dwellings, and mobile homes. It is designed to help residential customers reduce their energy usage through no-cost direct install energy efficiency upgrades. The program's primary objectives are to help customers understand their energy use, reduce their energy consumption and demand, save money on their utility bills, improve their quality of life, and improve the comfort of their homes. Qualifying customers will receive an energy assessment to determine which energy efficient upgrades and services they are eligible for. After upgrades are complete, customers who opt in will receive a quarterly energy report outlining their energy usage with tips on how they can continue to save energy. Measures include LED lighting, smart thermostats, water conservation measures, HVAC services, and energy efficiency tier II power strips. Additional individual energy assessments and ongoing education/tips are provided to customers as well.

PGE 21003 - Multifamily Upgrade Program (MUP)

- The Multifamily Upgrade Program (MUP) targets Multifamily properties in PG&E's service area. It offers per-unit incentives for multiple energy efficiency upgrades that escalate with higher energy savings. Third-party energy raters and contractors (trade allies) conduct site audits, build models to calculate project savings, and complete installations. PG&E has transitioned program delivery channels to integrate available multifamily services through a single customer service pathway referred to as the single point of contact (SPOC). The SPOC approach removes the customer burden of navigating available programs, determining eligibility, and applying to various program opportunities. SPOC provides tailored guidance for each multifamily customer. Rather than prescribing a program to a customer base, PG&E helps each customer assess needs individually to identify the best solution, or solutions, for each community or property. Through a menu that includes various complementary offerings, energy efficiency to water savings, and renewables, and previously out-of-reach assistance like benchmarking and financing, SPOC helps multifamily customers maximize project scope and energy savings by locating individualized solutions to their specific needs. These customers can use the On-Bill financing program which provides qualified PG&E customers 0% interest loans for energy efficiency retrofits; loans are repaid on PG&E bills.

III. Coordination between MCE and PG&E

MCE and PG&E will coordinate across four large areas: customer choice, marketing, policy, and double-dipping prevention. Coordination will occur through monthly meetings for the commercial sector and quarterly meetings for the residential sector.

Both MCE and PG&E will serve as customer facing PAs for their respective programs. MCE uses a single-point-of-contact concept that means when a customer approaches MCE, MCE will aggregate as much information as possible about other programs and opportunities so that the customer gains an introduction to many varied resources. As such, MCE will not be the only customer facing PA in their service territory, but will facilitate customers participating in their programs as well as other programs including:

- other PA programs for which they do not have a comparable offering,
- programs focusing on other resource conservation activities such as water conservation, or waste reduction
- programs focusing on health and safety improvements

Specifically, MCE and PG&E will coordinate in these areas:

- **Customer Choice:** Customers have a choice between PG&E and MCE programs. To ensure that customers understand this, both PAs will take steps to ensure information on all programs are known by those people talking with customers. Specifically, PG&E will appoint a point-person within PG&E that MCE can call for any questions regarding programs options. Additionally, PG&E will create a list of program options that the MCE SPOC can use during their customer interactions. MCE will also create a list of their program options that PG&E will share internally with their customer representatives (if relevant) and include in any third-party training so that all are familiar with MCE programs. PG&E and MCE will use their planned meetings to update these documents as needed.
- **Marketing:** In an effort to avoid customer confusion, MCE and PG&E will coordinate marketing activities by providing an overview of upcoming campaigns including scheduled timeline and targeted customer segment.
- **Policy:** MCE and PG&E are aware that program policies change over time and can affect the need for coordination. They will use the regular coordination calls to check in on policy changes and how to coordinate on any relevant changes.
- **Double dipping prevention:** PG&E and MCE understand the potential of customers seeking to obtain incentives for the same measures from both organizations (double-dipping). Section V of this attachment describes the protocol to prevent this from occurring.

IV. PROGRAMS PLANNED FOR LAUNCH IN 2019 – COORDINATION TO BE REVISITED

The MCE Programs listed below are in planning stages but will launch in early 2019. Other PA programs (PG&E or statewide) may launch in 2019 as well. MCE and PG&E will revisit the need for coordination once a bidder is chosen and program design, program implementation and measure portfolios are more clearly defined. MCE will share program details with PG&E program staff at that time to determine if specific coordination efforts are needed. MCE and PG&E will include any statewide programs in their discussions even if PG&E is not the PA managing the statewide program

Program ID	Program Name
MCE04	MCE Multifamily Direct Install Standalone Program
MCE05	MCE Multifamily Single Measure Program
MCE06	MCE Single Family Comprehensive Program
MCE07	MCE Single Family Direct Install Standalone Program
MCE08	MCE Single Family Single Measure Program
MCE10	MCE Industrial Energy Efficiency Program
MCE11	MCE Agricultural Energy Efficiency Program
MCE16	MCE Workforce, Education & Training Program

V. PG&E and MCE Programs: Double Dipping Prevention Procedures

It is a priority of the PG&E and MCE program teams that participants in ratepayer funded programs do not receive multiple incentives for the same installed measure. The PG&E and MCE teams propose the following procedures to prevent “double dipping” from incentive or rebate funding available from PG&E and MCE programs.

Summary of procedures

*Proposed actions for preventing double dipping in **current** program cycle:*

Timeline: Effective 8.1.2018

1. Identify all programs which have measure or customer overlap within MCE’s service area
2. MCE and PG&E will collaborate to ensure that customers have access to all program offerings within their service areas; regardless of the entity that generated or sourced the project lead.
3. All formal program documents (fact sheets, flyers, enrollment forms, rebate applications, etc.) from both MCE and PG&E indicate that program participants may not apply to multiple programs for the same measures.
4. Project enrollment forms will require a form field identifying the last utility incentive received, and the scope of work covered by the project.
5. Program Managers of overlapping programs will share completed project updates on a bi-monthly basis, on a project by project basis, before incentives are issued to customers (manual spreadsheet updates until an automated process can be identified).
 - MCE’s programs will also provide support and incentives for some measures covered by statewide programs, including Upstream and Midstream programs. MCE Program Managers (PMs) will notify PG&E PMs of any project which plan to install measures also covered by Upstream/Midstream programs. PG&E will lead coordination with the relevant Upstream/Midstream program to ensure that incentives are only paid to the customer.
6. Rejected applications will be shared among relevant Program Managers (managers of overlapping programs) monthly to ensure rejected applications are not sent to other programs.
7. Contractor process
 - Participating contractors in MCE and PG&E programs will be notified of policies pertaining to double dipping.
 - Contractor enrollment forms include a form field to identify the PA programs that they expect to participate in.
 - Multiple violations of double-dipping policies may disqualify a contractor from program participation.

Timeline: ongoing, to be concluded by end of Q1 2019

8. Program managers will explore automated processes double-dipping checks. This may include:
 - PG&E potentially giving MCE access to a dashboard within Energy Insight to review projects within MCE’s service area. This could provide an automated cross-check process that may require Shared Data access agreements (TSRs and NDAs). MCE is currently also exploring developing a Salesforce based program tracking portal, and the possibility for an API connection between databases.
 - PG&E exporting projects completed within PG&E programs, to include addresses and account numbers, which can then be incorporated into MCE’s project management tool to cross-check before enrollment in an MCE program. File to be updated every 6 months.

*Proposed actions for preventing double dipping on measures that were installed in **previous** cycles:*

1. MCE and PG&E will share information on all project addresses and account numbers which received program incentives or rebates within the last five years. All new projects will be cross-checked against historical program participation records.