June 17, 2019

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

MCE Advice Letter 36-E; PG&E Advice Letter 4107-G/5563-E (ID U39 M)

Re: Marin Clean Energy’s and Pacific Gas and Electric Company’s Annual Joint Memorandum of Cooperation for Program Year 2020


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 annual Joint Cooperation Memos no later than June 15.

Effective Date

Pursuant to General Order 96-B, MCE and PG&E respectfully request that this Tier 2 AL become effective on July 17, 2019, 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) Residential, multifamily; (3) Commercial; (4) Industrial; (5) Agricultural; and (6) Workforce Education and Training.⁴

¹ D.18-05-041, OP 38 at p. 190.
³ See D.18-05-041.
⁴ See id.
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 “summarize 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 2020 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.

**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

\(^5\) *Id.* at p. 111.
\(^6\) *Id.*
\(^7\) *Id.*, OP 39 at p. 191.
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:

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Phone: (415) 464-6044
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San Francisco, California 94177
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E-mail: PGETariffs@pge.com

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.

/s/ Jana Kopyciok-Lande

Jana Kopyciok-Lande
Senior Policy Analyst
MARIN CLEAN ENERGY

Attachment 1

MCE and PG&E Joint Cooperation Memo

Information herein describes coordination for programs with the potential to overlap currently being implemented in PG&E and MCE’s shared territory. Both PG&E and MCE are fielding bids for future programs to launch in 2020 and will continue discussions once programs are designed. These potential future programs are not included in this memo because solicitations are still in process or have yet to launch and details of possible programs resulting from those solicitations will not be finalizing at the time this memo is filed.

This attachment has five sections:

I. Nonresidential Program Information
II. Residential Program Information
III. Coordination (for nonresidential and residential sectors)
IV. MCE Programs to be launched with coordination to be revisited
V. Double dipping prevention procedure

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

Table 1: Nonresidential Sector - MCE and Comparable IOU Programs

<table>
<thead>
<tr>
<th>Program ID</th>
<th>Program Name</th>
<th>Sector</th>
<th>Budget 1</th>
<th>Measures</th>
</tr>
</thead>
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<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Lighting</td>
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<td>MCE02</td>
<td>Commercial Upgrade Program</td>
<td>Commercial</td>
<td>$1,185,725</td>
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</table>

1 PG&E’s and MCE’s budgets are based on 2019 budgets. These budgets are subject to change once the 2020 ABAL is finalized.
<table>
<thead>
<tr>
<th>Code</th>
<th>Sector</th>
<th>Subsector</th>
<th>Budget</th>
<th>Commercial Calculated Incentives</th>
<th>Commercial Deemed Incentives</th>
<th>Hospitality Program</th>
<th>Commercial HVAC Program</th>
<th>Energy Smart Grocer</th>
<th>East Bay</th>
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<tr>
<td>MCE10</td>
<td>Industrial</td>
<td>Industrial</td>
<td>$690,423</td>
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<tr>
<td><strong>IOU Comparable Nonresidential Resource Programs</strong></td>
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<tr>
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</tbody>
</table>
1.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 competitive bidding, design and procurement assistance, project management, and customer support. The program also aims to leverage deemed, custom and 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.

MCE10, MCE Industrial Program
- The MCE Industrial Energy Efficiency program is a comprehensive third-party program delivering electric and gas savings for industrial customers within MCE’s service area. The program will utilize Deemed, Custom, and Normalized Metered Energy Consumption (NMEC) savings analyses and claims, and host Strategic Energy Management (SEM) cohorts. Customer will benefit from a comprehensive approach to energy efficiency, combining MCE’s strong customer relationships and community presence, and ongoing communication with innovative methods, data-driven outreach and rigorous technical review.

MCE11, MCE Agricultural Program Program
- The MCE Agricultural Energy Efficiency program is a comprehensive third-party program delivering electric, gas and water savings for agricultural customers within MCE’s service area. The program will utilize Deemed and Custom savings analyses and claims. Customer will benefit from a comprehensive approach to energy efficiency, combining MCE’s strong customer relationships and community presence, and ongoing communication with innovative methods, data-driven outreach and rigorous technical review.

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 Energy Efficiency toolkit by reducing energy usage and optimizing the efficiency of mechanical equipment, lighting, and control systems to current standards in existing facilities. 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.

**PGE210143: Hospitality**
- PG&E’s Hospitality program offers a comprehensive list of Energy Efficiency 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 Energy Efficiency projects from start to finish.

**PGE21015: Commercial HVAC (Statewide)**
- PG&E implements the Statewide Commercial HVAC program for customers in its territory. The program comprises 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 Energy Efficiency 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.

**PGE21021: Industrial Calculated (Statewide)**
- PG&E implements the Statewide Industrial 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 facilities. 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 Energy Efficiency toolkit by reducing energy usage and optimizing the efficiency of mechanical equipment, lighting, and control systems to current standards in existing facilities. PG&E offers financial and technical assistance for customers to undertake RCx projects and implement measures that improve facility operations.

**PGE21021: Agricultural Calculated (Statewide)**
- PG&E implements the Statewide Agricultural 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 facilities. 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 Energy Efficiency toolkit by reducing energy usage and optimizing the efficiency of mechanical equipment, lighting, and control systems to current standards in existing facilities. PG&E offers financial and technical assistance for customers to undertake RCx projects and implement measures that improve facility operations.

**PGE21022: Industrial Deemed Incentives (Statewide)**
- PG&E implements the Statewide Industrial 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.

**PGE21032: Agricultural Deemed Incentives (Statewide)**
- PG&E implements the Statewide Industrial 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.

PGE21039: Comprehensive Food Process Audit & Resource Efficiency Program

- PG&E’s Comprehensive Food Process Audit & Resource Efficiency Program is a third-party program targeting PG&E customers in the food processing and post crop harvest activity industries. The program provides technical assistance and financial incentives for customers to install new equipment or systems that exceed applicable code and/or industry standards in existing buildings. As a comprehensive program, offerings include a broad range of custom and deemed energy efficiency measures including refrigeration, lighting, heat recovery, compressed air, pipe and tank insulation, and process optimization.

PGE210311: Process Wastewater Treatment Energy Management Program

- PG&E’s Process Wastewater Treatment Energy Management Program is a third-party program targeting PG&E food processing customers with existing or planned onsite wastewater treatment facilities. The program provides technical assistance and financial incentives for customers to install new equipment or systems that exceed applicable code and/or industry standards. The program offers custom measures including but not limited to automating control with dissolved oxygen sensors, high efficiency pumps and aerators, and variable frequency drives on aerators, blowers, and water/wastewater pumps.

PGE21034: Agricultural Pumping Efficiency Program

- PG&E’s Agricultural Pumping Efficiency Program is an educational and incentive program intended to improve overall pumping efficiency for PG&E’s agricultural customers (municipal and turf/landscape customers are also eligible). The program offers technical assistance, subsidies for pump testing, and incentives for overhauls of turbine pumps that involve either or both of the pump impeller and bowl, or the pump impeller and volute casing as applicable.

PGE210135: Water Infrastructure and System Efficiency

- PG&E’s Process Wastewater Treatment Energy Management Program is a third-party program targeting Water Agencies, Special Districts, and city owned water systems. The program provides technical assistance and financial incentives for customers to install new equipment or systems that exceed applicable code and/or industry standards. The program offers custom measures including but not limited to pump overhauls, variable frequency drives, storage systems, pump sequencing, and system optimization.

PGE210312: Dairy and Winery Industry Efficiency Solutions

- PG&E’s Dairy and Winery Industry Efficiency Solutions program is a third-party program targeting PG&E customers in the alcohol production and milk production industries, including breweries, wineries, dairies, and goat and sheep farming operations. The program provides technical assistance and financial incentives for customers to install new equipment or systems that exceed applicable code and/or industry standards in existing buildings. Offerings include a broad range of custom and deemed energy efficiency measures including refrigeration, lighting, HVAC, controls, and process optimization.

PGE21026: Energy Efficiency Services for Oil and Gas Production

- PG&E’s Energy Efficiency Services for Oil and Gas Production program is a third-party program targeting PG&E customers with oil and gas production facilities. The program provides technical assistance and financial incentives for customers to install new equipment or systems that exceed applicable code and/or industry standards in existing buildings. Offerings include a broad range of energy efficiency measures including conversion of outdated pumping systems, motor controllers, proper sizing of motors, pumps, and
premium efficient motors, variable frequency drives, water reduction technologies, and splitting water injection systems into high and low pressure.

**PGE21027: Heavy Industry Energy Efficiency Program**

- PG&E’s Heavy Industry Energy Efficiency Program is a third-party program targeting PG&E industrial customer facilities. The program provides technical assistance and financial incentives for customers to install new equipment or systems that exceed applicable code and/or industry standards in existing buildings. Offerings include design assistance, engineering support, and financing guidance to enable customers to reduce power demand, save energy and water, improve productivity, reduce emissions and waste materials, and become more competitive.

**PGE210210: Industrial Recommissioning (IRCx)**

- PG&E’s Industrial Recommissioning (IRCx) program is a third-party program targeting PG&E customers with industrial facilities. The program focuses on reducing the substantial energy losses that routinely occur in industrial facilities due to poorly controlled or malfunctioning equipment. Measures include optimization of compressed air systems, process systems, refrigeration systems, cooling systems, combustion systems, and heat exchanger systems.

**PGE210212: Industrial Compressed Air and Vacuum Optimization Program**

- PG&E’s Industrial Compressed Air program is a third-party program targeting PG&E customers with industrial facilities which have installed compressed air systems above 100 horsepower. This comprehensive turnkey program pays up to 50% of the project cost for eligible measures including air compressor replacement and compressed air system optimization.

**PGE21030: Industrial Strategic Energy Management**

- PG&E’s Industrial Strategic Energy Management program is a third-party program targeting PG&E customers with food processing or manufacturing facilities. The program is a holistic, whole facility approach that uses Normalized Meter Energy Consumption (NMEC) and dynamic baseline model to determine energy savings from all program activity at the facility, including capital projects, custom and deemed calculated retrofits, maintenance and operation, and retro-commissioning projects. The program requires a multi-year customer commitment to participation in multiple cohort-type training workshops, individual or cohort energy analysis, and Evaluation, Measurement, and Verification (EM&V) activities based on information and characteristics of the facility’s specific processes.

**Regional SMB Programs: PGE211009-East Bay; PGE211013-Marin; PGE211015-Napa; PGE211029-Solano**

- Regional SMB 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 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 2020 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. MCE will be launching a single family pay-for-performance program in 2019 and may need to coordinate with PG&E’s existing pay-for-performance programs. Both MCE and PG&E will have residential programs that may launch in 2020 (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 2020 are listed in Section III of this attachment.

Table 2: Residential Sector - MCE and Comparable IOU Programs

<table>
<thead>
<tr>
<th>Program ID</th>
<th>Program Name</th>
<th>Sector</th>
<th>Budget $</th>
<th>Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Lighting</td>
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<tr>
<td>MCE01</td>
<td>Multifamily Comprehensive Program</td>
<td>Residential</td>
<td>$1,074,957</td>
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<tr>
<td>MCE03</td>
<td>Single Family Seasonal Savings Program</td>
<td>Residential</td>
<td>$109,000</td>
<td></td>
</tr>
<tr>
<td>MCE05</td>
<td>Multifamily Standalone Direct Install Program</td>
<td>Residential</td>
<td>$296,971</td>
<td>X</td>
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</tbody>
</table>

2 PG&E’s and MCE’s budgets are based on 2019 budgets. These budgets are subject to changes once the 2020 ABAL is finalized.
<table>
<thead>
<tr>
<th>MCE08</th>
<th>Single Family Standalone Direct Install Program</th>
<th>Residential</th>
<th>$419,501</th>
<th>X</th>
<th>X</th>
<th>X</th>
<th>X</th>
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</thead>
</table>

**IOU Comparable Residential Resource Programs**

<table>
<thead>
<tr>
<th>PGE21003</th>
<th>Multifamily Upgrade Program</th>
<th>Residential</th>
<th>$7,500,000</th>
<th></th>
<th></th>
<th></th>
<th>X</th>
</tr>
</thead>
<tbody>
<tr>
<td>PGE210011</td>
<td>Residential Energy Fitness (MIDI subprogram)</td>
<td>Residential</td>
<td>$3,000,000</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
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</tbody>
</table>
II.B. PROGRAM SUMMARIES AND COORDINATION OF MCE AND COMPARABLE IOU RESIDENTIAL PROGRAMS

a) MCE Program(s)

MCE01, MCE Multifamily Program
- This program offers multifamily properties in MCE’s service area with common-area and in-unit single measure rebates as well as direct install opportunities of free in-unit measures to address barriers related to equipment cost and split incentives. These offerings can be layered with other programs or used as a standalone MCE offering.

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.

MCE05, MCE Multifamily Standalone Direct Install Program
- The MCE Multifamily Standalone Direct Install program is a direct install third-party program that will conduct basic energy efficiency assessments, install energy efficiency measures, water saving devices and health and safety equipment as well as other turn-key solutions. The Program will serve as a customer introduction to MCE’s comprehensive customer program services.

MCE07, MCE Single Family Comprehensive Program
- MCE is currently in a solicitation phase for its single family residential pay-for-performance program and there is insufficient detail on possible design.

MCE08, MCE Single Family Standalone Direct Install Program
- The MCE Multifamily Standalone Direct Install program is a direct install third-party program that will conduct basic energy efficiency assessments, install energy efficiency measures, water saving devices and health and safety equipment as well as other turn-key solutions. The Program will serve as a customer introduction to MCE’s comprehensive customer program services.

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 plan to coordinate across four large areas: customer choice, marketing, policy, and double-dipping prevention. Coordination is expected to occur through quarterly meetings encompassing both the commercial sector and 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.

Figure 1 below shows how PG&E, MCE, and BayREN plan to coordinate for the Multifamily Comprehensive program to minimize customer confusion around offerings over programs and maximize program uptake. PG&E and MCE will take a similar approach across all overlapping programs.
• **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, targeted customer segment and regional penetration rates.

• **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 – COORDINATION TO BE REVISITED

The MCE Programs listed below are in planning stages but will launch in mid 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.

<table>
<thead>
<tr>
<th>Program ID</th>
<th>Program Name</th>
<th>Launch Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>MCE05</td>
<td>MCE Multifamily Direct Install Standalone Program</td>
<td>Mid 2019</td>
</tr>
<tr>
<td>MCE07</td>
<td>MCE Single Family Comprehensive Program</td>
<td>Mid 2019</td>
</tr>
<tr>
<td>MCE08</td>
<td>MCE Single Family Direct Install Standalone Program</td>
<td>Mid 2019</td>
</tr>
<tr>
<td>MCE10</td>
<td>MCE Industrial Energy Efficiency Program</td>
<td>Mid 2019</td>
</tr>
<tr>
<td>MCE11</td>
<td>MCE Agricultural Energy Efficiency Program</td>
<td>Mid 2019</td>
</tr>
<tr>
<td>MCE16</td>
<td>MCE Workforce, Education &amp; Training Program</td>
<td>Mid 2019</td>
</tr>
</tbody>
</table>
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 (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: TBD

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:
9. 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.