

September 11, 2019

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



### **MCE Advice Letter 38-E**

#### **Re: Request for Timeline Only Extension of Marin Clean Energy’s Low-Income Families and Tenants Pilot**

Pursuant to Decision (“D.”) 19-06-022, *Decision Issuing Guidance to Investor-Owned Utilities for California Alternate Rates for Energy/Energy Savings Assistance Program Applications for 2021-2026 and Denying Petition for Modification*, Ordering Paragraph (“OP”) 7, Marin Clean Energy (“MCE”) hereby submits its request for a timeline only extension of its Low-Income Families and Tenants (“LIFT”) pilot program as MCE Advice Letter (“AL”) 38-E.<sup>1</sup>

#### **Tier Designation**

This AL has a Tier 1 designation pursuant to OP 7 of D.19-06-022, which allows MCE to request a timeline only extension of the LIFT pilot by submitting a Tier 1 AL no less than 45 days prior to expiration of the current timeline.<sup>2</sup>

#### **Effective Date**

Pursuant to General Order 96-B, MCE respectfully requests that this Tier 1 AL become effective upon disposition of the Energy Division.

#### **Background**

The Commission authorized MCE in D.16-11-022, as modified by D.17-12-009, to administer the Low-Income Families and Tenants (“LIFT”) pilot program to serve income-qualified multifamily properties by leveraging general energy efficiency (“EE”) programs and low-income energy savings programs.<sup>3</sup> The MCE LIFT pilot program has been offering technical assistance, rebates, and fuel switching opportunities to income-qualified multifamily property owners and residents since October 2017 under the umbrella of the Energy Savings Assistance (“ESA”) program.

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<sup>1</sup> D.19-06-022, OP 7 at p. 27.

<sup>2</sup> *Ibid.*

<sup>3</sup> Clean Copy of D.16-11-022, Decision on Large Investor Owned Utilities’ California Alternate Rates for Energy (CARE) and Energy Savings Assistance (ESA) Program Applications, OP 148.

MCE's LIFT program is currently approved as a two-year pilot program.<sup>4</sup> The program launched in October 2017 and is scheduled to terminate at the end of October 2019.

### **Purpose**

The purpose of this advice letter filing is to request a timeline-only extension of MCE's LIFT pilot as directed by OP 7 of D.19-06-022.<sup>5</sup> Since the pilot's launch in October 2017, MCE has found that the timelines for implementing energy efficiency measures in multifamily settings can be impacted by circumstances related to properties and participants. For example, the timeline between a property showing interest in participating in a multifamily EE program and finalizing the scope of work can take up to 12 months. It then can take up to another 6 months to install the agreed-upon measures. Factors that contribute to extended timelines include the range and diversity of stakeholders that are involved in the decision-making process, EE upgrades that need to be frequently coordinated with larger renovation projects, and property owners who are often faced with time and resource constraints.

Due to the extended timeline of implementing EE upgrades in multifamily settings, MCE respectfully requests to extend its LIFT pilot beyond October 2019 and through the end of the current ESA program cycle, or until funding is exhausted,<sup>6</sup> whichever comes first. It must be noted that the extension of the program timeline also implies that the deadline for submission of the LIFT final report will be extended to three months after the end of the current ESA program cycle, or until funding is exhausted, whichever comes first.<sup>7</sup>

### **Conclusion**

MCE respectfully submits this request to extend the timeline of its LIFT pilot pursuant to OP 7 of D.19-06-022 and requests Commission approval of the same.

### **Notice**

A copy of this AL is being served on the official Commission service lists for Application 14-11-007, *et al.*

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](mailto:Process_Office@cpuc.ca.gov).

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<sup>4</sup> Clean Copy of D.16-11-022 at 373.

<sup>5</sup> D.19-06-022, OP 7 at 27.

<sup>6</sup> D.16-11-022 approved \$3.5 million for MCE's LIFT pilot. See Clean Copy of D.16-11-022 at 387

<sup>7</sup> MCE proposed to submit a final report three months following the conclusion of the pilot in the "Testimony of Marin Clean Energy Regarding a Proposed Low-Income Energy Efficiency Pilot Program for the Program Years 2015-2017", submitted on April 27, 2015, at p.28. D.16-11-022, as modified by D.17-12-009, directed MCE submit a final report upon conclusion of the pilot, as proposed (see p.386).

## **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](mailto: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](mailto:jkopyciok-lande@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](mailto:jkopyciok-lande@mceCleanEnergy.org).

/s/ Jana Kopyciok-Lande

Jana Kopyciok-Lande  
Senior Policy Analyst  
MARIN CLEAN ENERGY

cc: Service List: A.14-11-007, *et al.*



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person:

Phone #:  
E-mail:  
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type:  Monthly     Quarterly     Annual     One-Time     Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

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:

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     No

Requested effective date:

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:

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

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

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

## 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
Curtable 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	