



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: **East Bay Community Energy/ #201**

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: **Feby Boediarlo**

Phone #: **510-650-7582**

E-mail: **fboediarlo@ebce.org**

E-mail Disposition Notice to: **fboediarlo@ebce.org**

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: **28-E-A**

Tier Designation: **3**

Subject of AL: **East Bay Community Energy Election to Administer Energy Efficiency Program**

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 #: **D. 14-01-033, D. 21-05-031**

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: **28-E**

Summarize differences between the AL and the prior withdrawn or rejected AL: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 proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss 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

Name: Feby Boediarto
Title: Regulatory Analyst
Utility Name: East Bay Community Energy
Address: 1999 Harrison Street, Suite 800
City: Oakland
State: California Zip: 94610
Telephone (xxx) xxx-xxxx: 510-650-7582
Facsimile (xxx) xxx-xxxx:
Email: fboediarto@ebce.org

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

Clear Form

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	



March 10, 2022

Advice No. 28-E-A

(East Bay Community Energy ID 201)

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

Subject: East Bay Community Energy Election to Administer Energy Efficiency Program

PURPOSE

California Public Utilities Commission Decision (“D.”) 14-01-033, *Decision Enabling Community Choice Aggregators to Administer Energy Efficiency Programs* (“the Decision”), established the rules for Community Choice Aggregators (“CCAs”) to file advice letters to administer energy efficiency programs for their own customers under California Public Utilities Code Sections 381.1(e)-(f).¹ East Bay Community Energy (“EBCE”) submits this Tier 3 Advice Letter to seek Commission certification under Sections 381.1 (e) and (f) to administer one energy efficiency program, a Commercial Pay-for-Performance (“P4P”) Program, as described in further detail below. All necessary supporting documentation is attached hereto.

BACKGROUND

EBCE is a Joint Powers Authority formed on December 1, 2016, pursuant to California Government Code §§ 6500 *et. seq.* by the County of Alameda and all cities incorporated therein, as well as the City of Tracy. The Commission certified EBCE’s Implementation Plan on November 8, 2017. EBCE started serving Alameda County businesses and municipalities in June 2018 and began serving residential customers in November 2018. On March 9, 2020, the Commission certified Addendum #1 to EBCE’s Implementation Plan and Statement of Intent, adding the cities of Newark and Pleasanton, as well as the city of Tracy in San Joaquin County, to EBCE’s service territory beginning in 2021. EBCE is currently one of the largest CCAs in the state.

¹ All subsequent references to code sections are to the Cal. Pub. Util. Code.

EBCE serves over 576,000 residential accounts, 57,000 non-residential accounts, and 5,000 municipal accounts in Alameda County and in Tracy, California. EBCE is committed to providing clean energy options for its diverse community.

The CalEnviroScreen 4.0 tool identifies 40 census tracts in EBCE's service area that score within the top 25% of communities with the highest burden. Those 40 census tracts have a population total of 167,203. Additionally, EBCE currently provides service to over 120,000 residential accounts participating in CARE and over 4,000 in FERA, accounting for over 20% of EBCE's accounts.²

On October 22, 2021, EBCE submitted an Energy Efficiency Advice Letter following the cost-effectiveness guidelines originally approved in D.21-05-031. However, the Energy Division rejected EBCE's use of the portfolio segmentation approach and EBCE was directed to bring the entire portfolio up to 1.0 TRC.³ As a result, EBCE received a notice of suspension for the previously submitted Advice Letter (28-E) for 120 days from when the suspension notice was received. The Advice Letter and Program Plan below now meet the cost-effectiveness requirements laid out in D.14.01.033 by removing the Low- and Moderate-Income Energy Efficiency program in the following attachments.

With this Advice Letter, EBCE exercises its statutory authority to become an administrator of funds for energy efficiency and conservation programs.⁴ EBCE's Energy Efficiency Program Plan ("Plan"), is attached hereto and discussed in more detail below. Funding to implement the plan will be collected from EBCE ratepayers through a non-bypassable charge authorized by the Commission.

SUMMARY OF PLAN

The Plan is for one program: the Commercial Pay-for-Performance (P4P) Program. In administering this program, EBCE will be leveraging its experience and existing resources from current pilots of similar program concepts. This should support the timely and efficient launch of the proposed portfolio.

COMMERCIAL P4P PROGRAM

EBCE's program will leverage emerging P4P program approaches to offer cost-effective projects for its non-residential customer accounts. Projects will focus on high-potential opportunities for peak load management and building electrification. EBCE will use its existing data and analytics capabilities to assist program implementers in identifying the highest opportunity projects. EBCE will pay incentives for cost-effective savings measured at the meter with the CalTRACK methodologies.

² 06/2021 data

³ Per email received from staff at the Energy Division of the California Public Utilities Commission, 11/30/2021.

⁴ California Public Utilities Code §381.1.

Deliverables

The program will provide a marketplace approach, where qualified vendors are allowed to submit projects and receive incentives on a portfolio of projects. There will be a high emphasis on demand management strategies, including permanent baseload reduction as well as controls-based load shifting approaches. Customers will be educated on the potential impacts of time-of-use (“TOU”) rates and offered tools and strategies for adapting their business model to new rate structures, as they emerge.

Though not necessarily an exhaustive list, EBCE proposes to support the installation of the following measure types:

- Refrigeration controls
- Lighting measures
- Building envelope
- Retro-commissioning
- Building electrification measures: Heat pump water heating, space heating, and induction cooking technologies
- Load management strategies (controls, programmable thermostats, smart appliances)

EBCE’s will explore and incorporate new offerings over time that will advance and align with state goals while supporting new local emerging markets. Examples may include, but are not limited to:

- Commercial building electrification
- Combined demand response (“DR”) / energy efficiency (“EE”) installations

Commencement Date

The program will begin three months following CPUC approval and will run for a minimum of three years.

Cost-Effectiveness Analysis

The initial forecasted Total Resource Cost (“TRC”) for the Commercial P4P Program is 1.07 with a forecasted Program Administrator Cost (“PAC”) of 1.87. The full results of the calculation can be found in Appendix A: TSB and Cost-Effectiveness Calculations. EBCE expects that the TRC will improve in subsequent implementation years, after the program is ramped up.

Demand Reduction, Energy Savings, and Other Measures of Success

EBCE expects that the first-year gross energy savings for the program will be 9,011,867 kWh with demand savings of 1029 kW.

Additional measures of success will include, but not be limited to:

- 60% of projects will include demand control strategies
- 50% of projects will include “high opportunity” projects as identified by EBCE staff (for example, customers in the top 25% of peak demand users)

- 30% of projects will include building electrification measures

Budget

The three-year program budget for the Commercial P4P Program is \$13,463,049.

COLLABORATION

EBCE will collaborate and partner with PG&E and BayREN. EBCE will differentiate its locally administered program from PG&E's and BayREN's. EBCE will also provide PG&E and BayREN all necessary information regarding locally funded programs and statewide and regional program referrals. EBCE will partner with PG&E and BayREN to collectively direct customers to the best service, while reducing confusion at every step. Additionally, EBCE is currently tracking the Joint Coordination Memorandum that BayREN and MCE are collaborating on and plan to use a similar approach to avoid duplication and customer confusion.

STATUTORY AUTHORITY

Assembly Bill 117 (2002) and Senate Bill (SB) 790 (2011) contain specific provisions relating to administration of energy efficiency programs by CCAs. AB 117 established the formal application option, allowing CCAs to file an application for administration of energy efficiency programs.

SB 790 modified Section 381.1 to give CCAs another option for energy efficiency program administration, adding subsections (e) and (f) to Section 381.1. These newer subsections allow a CCA to invoke an alternative Commission review process (as opposed to a formal application) for programs funded by and offered exclusively to CCA customers.

D.14-01-033 established the rules governing CCA submission of advice letters to administer energy efficiency programs for their own customers under Sections 381.1(e)-(f). This second option allows a CCA such as EBCE to "elect" to become an administrator for cost-effective energy efficiency and conservation programs, subject to Commission certification of a plan. This is the option which EBCE is pursuing in this advice letter.

RULES AND REQUIREMENTS GOVERNING PLAN CERTIFICATION

Per D.14-01-033, the Commission must first make a funding determination, *i.e.*, establish whether the funding requested in the CCA's proposed plan is within the forecasted maximum amount of funds the CCA would be eligible to collect. Next, the Commission must certify that a CCA plan meets six criteria, specified in paragraphs (1)-(6) of Section 381.1(f). These requirements are addressed on a cursory level below and in detail in the attached Plan.

FUNDING DETERMINATION

Resolution E-4518 states that "funding collection and program periods do not always correspond" and that there is no statutory requirement for funding collection to begin subsequent to Commission certification of the plan. MCE was provided a collection period starting on the original draft submittal date. Based on this precedent, it is reasonable for CPUC

to direct transfer of energy efficiency funds collected from EBCE's ratepayers to EBCE beginning on October 22, 2021, EBCE's advice letter filing date.

The Commission must establish whether the funding requested in the CCA's proposed plan is within the forecasted maximum amount of funds the CCA would be eligible to collect. Commission staff must determine the actual and forecasted amounts of non-bypassable charges likely to be collected from the CCA's customers over a reasonable collection period to fund energy efficiency programs. The Commission is to use the following formula:

CCA maximum funding = total electricity energy efficiency non-bypassable charge collections from the CCA's customers – (total electricity energy efficiency non-bypassable charge collections from the CCA's customers x % of the applicable IOU portfolio budget that was dedicated to statewide and regional programs in the most recently authorized program cycle)

EBCE staff have determined:

- Total non-bypassable funds to be collected from EBCE customers in 2022 = \$133,201,953.98
- 96.63% of collected funds are currently dedicated to statewide and regional programs.
- Total funding to statewide and regional programs from EBCE customers = \$128,714,271.14
- EBCE's first year not-to-exceed value = Total non-bypassable funds collected from CCA customers less statewide and regional programs ($(\$133,201,953.98 * [1 - \% \text{ excluded IOU budget } (96.63\%)]) = \$4,487,682.84$)
- The three year not-to-exceed value equals \$13,463,049

To calculate energy efficiency non-bypassable charge collections from EBCE's customers in 2022, EBCE used forecasted electricity sales for 2022. To determine the portion of funding used for statewide and regional programs, EBCE used the program budget from PG&E's 2021 Annual Budget Advice Letter (ABAL), PG&E's most recent approved program budgets. Under this budget, 96.63% of funds are budgeted to go to statewide, regional and uncategorized programs, and 3.37% are budgeted to go to local programs.⁵ EBCE's first-year not to exceed

⁵ To calculate energy efficiency non-bypassable charge collections from EBCE's customers in 2021, EBCE used fee per kWh data and load data from PG&E, SMUD, and CAISO as well as PG&E's 2021 ABAL program budget. PG&E programs included as local or other programs, consistent with communications with PG&E and CPUC, and therefore eligible to be included in EBCE's funding determination are: PGE2110051 (Local Government Energy Action Resources), PGE_Pub_001 (Central Coast Leaders in Energy Action Program), PGE_Pub_002 (Marin Energy Watch Partnership), PGE_Pub_003 (Redwood Coast Energy Watch), PGE_Pub_004 (Central California Energy Watch), PGE_Pub_005 (San Mateo County Energy Watch Program), PGE_Pub_006 (Energy Access SF), PGE_Pub_007 (Sierra Nevada Energy Watch), and PGE_Pub_008 (Sonoma Public Energy).

value is 3.37% of the total non-bypassable funds collected from EBCE customers for EE programs.

SECTION 381.1(f) REQUIREMENTS

Pursuant to Section 381.1(f), the Commission must certify that this Plan meets six criteria, specified in paragraphs (1)-(6), which provide:

The commission shall certify that the plan submitted does all of the following:

- (1) Is consistent with the goals of the programs established pursuant to this section and Section 399.4.
- (2) Advances the public interest in maximizing cost-effective electricity savings and related benefits.
- (3) Accommodates the need for broader statewide or regional programs.
- (4) Includes audit and reporting requirements consistent with the audit and reporting requirements established by the commission pursuant to this section.
- (5) Includes evaluation, measurement, and verification protocols established by the community choice aggregator.
- (6) Includes performance metrics regarding the community choice aggregator's achievement of the objectives listed in paragraphs (1) to (5), inclusive, and in any previous plan.

Consistency with CPUC Goals

The attached Plan explains in detail how it is consistent with the goals of the programs established pursuant to Section 381.1 and Section 399.4. EBCE's commercial program will deliver cost-effective energy savings to its customers while remaining consistent with CPUC goals, supporting EBCE's goal for providing 100% clean energy by 2030, and aligning to its statement of intent to implement a CCA program that includes universal access, reliability, and equitable treatment of all customer classes.

EBCE's program is consistent with broader regional or statewide energy efficiency programs and are designed to integrate demand side management activities in a way that will value stack the deployment of distributed energy resources. This will also support relevant rulings and decisions such as, but not limited to, D.07-10-032 and D.12-11-015.

The proposed Plan meets the State's goals to decarbonize California as detailed in the 2021 Integrated Energy Policy Report (IEPR) Final Scoping Order. The California Energy Commission is committed to advancing building decarbonization incentive programs, while assessing existing and future policies and programs in an equitable manner. EBCE's Plan aligns with such goals as we enroll customers into an energy efficiency incentive program that saves customers money and reduces emissions while also offering building electrification measures to advance the state's climate goals. Particularly, the Commercial P4P program will leverage emerging P4P

program approaches to offer cost-effective projects for non-residential customer accounts. Projects will focus on high-potential opportunities for peak management and building electrification.

By acting as point of contact for EBCE customers, EBCE will simplify achieving the goals set forth in Section 381.1. This will ensure that local and statewide goals are met, such as those associated with SB 350.

Cost-Effectiveness and Total System Benefit

EBCE's Commercial P4P Program achieves a TRC of 1.07. EBCE performed cost-effectiveness analysis on the proposed program portfolio in accordance with the methodologies included in the California Standard Practices Manual. As detailed in the attached Plan, EBCE's first-year forecasted program portfolio TRC is 1.07 for the resource program segment and forecasted first-year Program Administrator Cost ("PAC") for the portfolio is 1.57. EBCE forecasts that TRC will improve in subsequent implementation years, after the program is ramped up. The full results of the calculation can be found in Appendix A: Cost-Effectiveness Calculations.

Accommodation of Statewide and Regional Programs

Both PG&E and BayREN are Program Administrators offering ratepayer funded EE programs in EBCE's service area. EBCE will work closely with BayREN and PG&E to verify that customers have not been double-enrolled and to coordinate marketing and outreach efforts where appropriate. At a minimum, this will include requiring customers to verify that they have not received, or do not plan to receive, other utility incentives for their project. For applications received from non-CCA customers, EBCE will provide warm hand-offs to the relevant PG&E or BayREN program.

Auditing and Reporting

EBCE performs annual financial audits using generally accepted accounting principles (GAAP) specific to government entities. These reports are publicly available and will be provided to the CPUC on request. As a Joint Powers Authority CCA, once EBCE's energy efficiency program plan is certified and the program begins, current auditing procedures will be extended to include energy efficiency program administration data. This will ensure appropriate accounting controls for energy efficiency program funds.

Per requirements of the Governmental Accounting Standards Board, discussion and analysis will be included to supplement the basic financial statements. To evaluate the effective use of resources and management procedures, EBCE will also complete all regulatory filings and reports as directed by CPUC staff. These documents will provide the results of program efforts that can be evaluated against the performance metrics identified by EBCE, including adherence to cost-effectiveness requirements.

Evaluation, Measurement, and Verification Protocols

EBCE will contract with an independent third-party to perform process evaluation or market studies to determine the effectiveness and needs for the successful implementation of the program. EBCE-led studies will be performed according to the Commission oversight process of IOU Evaluation Measurement and Verification (“EM&V”) projects as detailed in the Energy Efficiency EM&V Plan. EBCE will be subject to the same protocol as IOUs for CPUC-directed impact evaluations to determine actual energy savings, benefits, costs, and goal achievement as directed in D.05-01-055. EBCE expects to dedicate no more than 3% of total program budget during the three-year program to EM&V.

Performance Metrics

The attached Plan contains a section regarding performance metrics, which will indicate progress toward meeting the goals and objectives of the Commission’s Energy Efficiency Strategic Plan and EBCE’s service goals.

CONCLUSION

The Plan meets all requirements as outlined by relevant statutory authority as well as Commission decisions and resolutions. Therefore, EBCE requests that the Commission certify the Plan via resolution.

ATTACHMENTS

Attachment 1 – Plan and Appendices

- East Bay Community Energy’s Energy Efficiency Program Plan (Clean)
- Appendix A: Cost-Effectiveness Calculations (Clean)
- Appendix B: Funding Analysis (Clean)

Attachment 2 – Redline of Plan and Appendices

- East Bay Community Energy’s Energy Efficiency Program Plan (Redline)
- Appendix A: Cost-Effectiveness Calculations (Redline)
- Appendix B: Funding Analysis (Redline)

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.3, and Decision (D.) 14-01-033, East Bay Community Energy (EBCE) submits this Advice Letter with a Tier 3 designation.

EFFECTIVE DATE

This advice filing will become effective upon approval by the California Public Utilities Commission (Commission) via the resolution process.

NOTICE

In accordance with GO 96-B, Section IV, a copy of this advice letter is sent electronically to parties shown on service list A.17-01-013 and R.13-11-005.

As required in the Decision, EBCE is serving copies of this advice letter to the relevant parties shown on the A.17-01-013 service list, and also serving copies of this advice letter as a courtesy to the energy efficiency proceeding, R.13-11-005. For changes to these services lists, please contact the Commission's Process Office at (415) 703-2021, or by electronic mail at Process_Office@cpuc.ca.gov.

PROTESTS

EBCE was directed by the Energy Division to maintain the original protest period designated in EBCE AL 28-E pursuant to GO 96-B, General Rule 7.5.1⁶, and not reopen the protest period.

CORRESPONDENCE

For questions, please contact Feby Boediarso at (510) 650-7582 or by e-mail at fboediarso@ebce.org.

/s/ Feby Boediarso
Feby Boediarso, Regulatory Analyst
East Bay Community Energy
1999 Harrison Street
Suite 800
Oakland, CA 94610
(510) 650-7582
Email: fboediarso@ebce.org

Copy (via e-mail): Service List – A.17-01-013
 Service List – R.13-11-005
 Energy Division Tariff Unit (EDTariffUnit@cpuc.ca.gov)
 PG&E Tariffs (AdviceTariffManager@pge.com)

⁶ "The filing of a supplement, or of additional information at the request of the reviewing Industry Division, does not automatically continue or reopen the protest period or delay the effective date of the advice letter. The reviewing Industry Division, on its own motion or at the request of any person, may issue a notice continuing or reopening the protest period. Any new protest shall be limited to the substance of the supplement or additional information."

Attachment 1: Plan and Appendices



East Bay Community Energy's Energy Efficiency Program Plan

Introduction

East Bay Community Energy (“EBCE”) is a Joint Powers Authority formed on December 1, 2016, pursuant to California Government Code §§ 6500 *et. seq.* and started serving residential, commercial, and municipal customers in 2018. EBCE serves Alameda County and each of the following cities incorporated therein: Albany, Berkeley, Dublin, Emeryville, Fremont, Hayward, Livermore, Newark, Oakland, Piedmont, Pleasanton, San Leandro, and Union City, as well as the city of Tracy in San Joaquin County. EBCE started service for Newark, Pleasanton, and Tracy residents, businesses, and government entities in 2021. EBCE’s Board of Directors (“Board”) is made up of 16 Directors, including one Community Advisory Committee member (non-voting). The Board serves a primary role to direct and advise EBCE staff to achieve EBCE’s organizational goals. Because the Board consists of elected officials, EBCE is accountable to its constituents, and can recognize and respond to local energy needs rapidly. EBCE is currently one of the largest Community Choice energy providers in the state. EBCE serves a little over 576,000 residential accounts, 57,000 non-residential accounts, and 5,000 municipal accounts. EBCE is committed to designing and implementing energy efficiency programs for its customers, including its low-income communities, with a focus on energy savings, reducing greenhouse gas (“GHG”) emissions, resource and energy conservation, and greater bill stability.

As the County of Alameda and the City of Tracy’s locally operated, community choice electric power provider, EBCE is committed to decarbonizing its electric supply as well as keeping rates affordable. EBCE’s 2018 Local Development Business Plan (“LDBP”) is a founding framework for EBCE staff and Board aimed to accelerate clean energy initiatives and efforts. The LDBP outlines a series of recommendations to advance local investments, including a strategy to develop energy efficiency programs. EBCE’s Energy Efficiency (“EE”) portfolio is designed to form synergy with the CPUC’s EE portfolio rules, while coordinating with community-based organizations and leveraging customer data to ensure targeted and effective marketing and tracking of program impacts. EBCE is committed to EE as an organizational priority, targeting and reducing EBCE’s most expensive loads so we can deliver enhanced customer experiences while maintaining low and stable retail rates.⁷

EBCE’s approach to resource acquisition EE revolves around identifying the highest cost and dirtiest loads and targeting reduction of that load through a combination of efficiency and peak load reduction strategies. By leveraging emerging population-level pay-for-performance program models, EBCE can facilitate value stacking among permanent baseload reduction and load modifying activities, enhancing the value proposition to both the customer and EBCE.

⁷ EBCE Local Development Business Plan (LDBP) at p. 19.

Through the administration of the EE program, EBCE seeks to achieve the following outcomes:

Portfolio-Wide

- Energy savings
- Customer utility bill savings
- Avoided GHG
- Increased customer awareness of energy and GHG reduction opportunities
- Peak load reduction benefits
- Integration with EBCE and other distributed energy resource offerings (including solar, storage, and electric vehicle programs)

EBCE is electing to become an administrator of ratepayer funds by the California Public Utilities Commission (“CPUC”) for cost-effective energy efficiency and conservation programs. EBCE submits this program plan to the CPUC for certification under California Public Utilities Code 381.1 (e) and (f) to administer a Commercial Pay-for-Performance program.

EBCE has deep connections to the communities it serves and is fully qualified to provide energy efficiency services to its customers. EBCE puts forth this energy efficiency program plan pursuant to Public Utilities Code 381.1:

(e) The impartial process established by the commission shall allow a registered community choice aggregator to elect to become the administrator of funds collected from the aggregator’s electric service customers and collected through a non-bypassable charge authorized by the commission, for cost-effective energy efficiency and conservation programs, except those funds collected for broader statewide and regional programs authorized by the commission.

(f) A community choice aggregator electing to become an administrator shall submit a plan, approved by its governing board, to the commission for the administration of cost-effective energy efficiency and conservation programs for the aggregator’s electric service customers that includes funding requirements, a program description, a cost-effectiveness analysis, and the duration of the program. The commission shall certify that the plan submitted does all of the following:

- (1) Is consistent with the goals of the programs established pursuant to this section and Section 399.4
- (2) Advances the public interest in maximizing cost-effective electricity savings and related benefits.
- (3) Accommodates the need for broader statewide or regional programs.
- (4) Includes audit and reporting requirements consistent with the audit and reporting requirements established by the commission pursuant to this section.

- (5) Includes evaluation, measurement, and verification protocols established by the community choice aggregator.
- (6) Includes performance metrics regarding the community choice aggregator's achievement of the objectives listed in paragraphs (1) to (5), inclusive, and in any previous plan.

Commercial P4P Program

A. Overview

EBCE's Commercial Pay-for-Performance ("P4P") Program is designed to provide combined energy efficiency and load management services to EBCE's non-residential customers. The program seeks to maximize cost effective energy savings measures, particularly those that reduce consumption during peak periods. Through offering a meter-based approach, the program more easily allows for value stacking between traditional EE measures and emerging load management approaches and sends the price signal to customers that load reduction is valued from 4-9 pm.

The Commercial P4P Program has three primary objectives:

Deliver cost-effective energy savings to non-residential customers;

Cross-promote demand response and energy efficiency to maximize peak load reductions for energy efficiency projects; and,

Encourage electrification of existing natural gas end uses to achieve greenhouse gas reductions.

This market sector represents EBCE's best opportunity for cost effective energy efficiency measures. To maximize the benefits to EBCE's customers and ratepayers, the program is designed to pay incentives only where the benefits of a project exceed the costs on a system basis. To ensure that the program serves customers who are a good fit, EBCE will leverage its internal data analytics and tracking systems to market the program to best suited customers. Sample parameters that customers may be targeted on include but are not limited to:

- High contributors to peak energy use
- High energy consumption relative to industry peers
- Commercial or industrial business type that have participated in EE programs in the past

This program will leverage emerging pay-for-performance incentive models, relying on a third-party implementer to track the energy savings impacts of this program via an experimental design approach. Aggregators will be invited to submit portfolios of projects to EBCE and will be paid incentives on the entire portfolio.

Table 1: Metrics At-a-Glance – Commercial P4P Program

Year	Gross kWh Savings	Net kWh Savings	Percentage	
1	9,011,867	8,561,274	29.71%	of 3-year Goal
2	9,011,867	8,561,274	29.71%	
3	12,304,105	11,688,900	40.58%	
Total	30,327,839	28,811,448	100%	

Table 2: Budgets At-a-Glance – Commercial P4P Program

Cost Category / Program Function	Year 1	Year 2	Year 3	Total
Administration	\$430,818	\$430,818	\$430,818	\$1,292,454
Marketing, Education and Outreach	\$258,491	\$258,491	\$258,491	\$775,473
Direct Implementation Non-Incentive	\$861,635	\$861,635	\$861,635	\$2,584,905
Direct Implementation Incentive	\$2,757,232	\$2,757,232	\$2,757,232	\$8,271,696
EM&V	\$179,507	\$179,507	\$179,507	\$538,521
Program Budget	\$4,487,683	\$4,487,683	\$4,487,683	\$13,463,049

B. Market Sector Targeted

In 2020, EBCE’s commercial customers consumed 2,854 GWh of electricity, accounting for 48.4% of the entire load. This sector is made up of about 53,400 accounts, encompassing 9.5% of all accounts.⁸ The commercial load experiences its highest collective use outside of peak hours but still contributes notably during this period.

Commercial customers are responsible for a large percentage of EBCE’s total electric load, and the time of day that customers use that energy contributes to the price they pay, the burden on the grid, and the associated GHG emissions. Customers with high peak usage will be key targets for EBCE’s Commercial P4P program due to the cost-effective nature of use reduction and price signals from TOU rates.

This program will also target business owners in sectors with high therm usage most likely attributed to air and water heating as great candidates for gas to electric conversions that would improve efficiency and reduce GHG emissions. These sectors include education, finance/insurance, public administration, and restaurant/food. Gas usage data is only available for about 56% of this subset of the population. Nonetheless, disaggregated therm usage suggests that about 26% percent of total therms are used for space heating for customers in

⁸ The analysis performed in this section was completed with 2020 or 2019 data and has not been updated for this filing. EBCE will be refreshing this analysis prior to program implementation. Tables 3 and 4, showing total kWh and therm usage by NAICS code, have been updated with 2021 data.

these four sectors. Similarly, a look at the disaggregated electric load of these four sectors shows that about 13% of total electrical load is used for AC. These two pieces suggest that this customer segment may be able to achieve cost-effective energy savings through pre-heating/cooling strategies in addition to fuel substitution.

In 2019, EBCE served over 3,700 retail business meters. Retail business customers are characterized by an afternoon peak with a declining but notable contribution to peak hours. Due to the high prevalence of cooling load among this customer segment there is a general increase in electricity usage in summer months in addition to a higher peak. Retail usage peaks at 11 kW during summer, 9.1 kW during the winter, and 9.3 kW during shoulder months. The majority (57.2%) of electricity consumption among retail customers is tied to baseload. This customer segment has a high cooling load of 11.6% and will be targeted for pre-cool strategies to shift the elevated summer load into midday hours when solar is more productive and energy is cheaper. The program will also offer retail customers building envelope measures as they are likely to see meaningful energy savings through these measures. Depending on the size of the operation, retail customers may be good targets for fuel substitution incentives. Smaller retail establishments present with simpler HVAC and water heating needs and are among the best targets for electrification compared to large retail with industrial sized systems.

EBCE customers in the restaurant and food service industry provide tremendous opportunity for energy efficiency upgrades, particularly in the space of kitchen electrification. In 2019, EBCE served over 3,200 meters in this category. The general load shape of this customer group includes an upward ramp in morning hours followed by two similar peaks around lunchtime and dinner. This load shape is seen consistently across seasons with a general increase in load during summer months. The greatest opportunity to reduce and shift load out of peak periods for this customer group would be in non-cooking energy use cases such as space and water heating and cooling that could implement pre-heat/cool strategies.

For each targeted commercial sector, EBCE will rely on utility billing analytics to identify the peak energy consumers and peak demand contributors among EBCE’s commercial customer base. Through targeted marketing to this subset of customers, EBCE anticipates having higher savings per customer, resulting in an overall higher Total Resource Cost (“TRC”) for the program.

Table 3. Customer Count and Annual kWh Usage by Selected Industry Type

Industry	# of Meters as of 2021	Total Annual kWh
Accommodation and Food Services	5551	265,131,727
Administrative and Support and Waste Management and Remediation Services	1326	73,312,434
Construction	5553	60,370,924
Educational Services	1982	123,390,231

Finance and Insurance	1215	38,947,598
Manufacturing	5116	991,547,031
Professional, Scientific, and Technical Services	2874	160,467,623
Retail Trade	6549	338,777,704
Transportation and Warehousing	1942	136,361,888
Utilities	642	29,180,046

Table 4. Customer Count and Annual Therms Usage by Selected Industry Type

Industry	# of Meters as of 2021	Total Annual Therm
Accommodation and Food Services	20	1,457,517
Administrative and Support and Waste Management and Remediation Services	84	1,203,262
Construction	4489	39,407,571
Educational Services	64	1,164,861
Finance and Insurance	123	915,984
Manufacturing	8772	61,223,970
Professional, Scientific, and Technical Services	146	3,182,027
Retail Trade	506	5,541,814
Transportation and Warehousing	192	5,220,411
Utilities	1554	7,168,465

C. Deliverables

EBCE's Commercial P4P Program will create a marketplace for energy efficiency aggregators to deliver cost-effective, high performing, installed measures that lower baseload consumption for commercial customers. EBCE is working with aggregators to reward energy efficiency investments that emphasize peak load reduction with financial incentives.

There will be a high emphasis on demand management strategies, including permanent baseload reduction as well as controls-based load shifting approaches. Customers will be educated on the potential impacts of time-of-use (TOU) rates and offered tools and strategies for adapting their business model to these new rate structures.

Through not necessarily an exhaustive list, EBCE proposes to install the following measure types:

- Refrigeration controls
- Lighting measures
- Building envelope
- Retro-commissioning
- Building electrification measures: Heat pump water heating, space heating, and induction cooking technology
- Load management strategies (controls, programmable thermostats, smart appliances)

EBCE will pay only for measured and delivered electric energy efficiency that is valued at a TRC ratio of 1.0 or above. The program allows for custom measures, however, the measures that may be most likely to exceed the cost-effectiveness threshold are lighting and refrigeration measures. New gas appliances are excluded.

EBCE's program design is flexible, adaptive, and innovative and we will explore and incorporate new offerings over time that will advance and be consistent with state goals while aligning to and supporting new local emerging markets such as:

- Commercial building electrification
- Combined demand response ("DR") / EE installations

D. Program Innovation

The Commercial P4P Program enables innovative business models and technology in the broader market through incentives that pay for the maximum cost-effective value to the grid and climate, without the barriers and complexity of traditional energy efficiency programs. Companies are free to develop their unique business models and technologies, without complex program rules and deemed outcomes.

EBCE will pay only for measured and delivered energy efficiency that is valued at a TRC ratio of 1.0 or above. Therefore, incentives will not be paid out until a TRC of 1.0 is reached. Rather than running complicated solicitations, picking winners, and taking the performance and business risk, the Commercial P4P Program allows EBCE to engage the broad market of solutions for its customers and focus on sending a price signal that appropriately values savings to the grid.

In addition, the meter-based approach to this program allows EBCE to value delivered energy reductions regardless of source, opening the door for greater incorporation of demand management strategies deployed along with energy efficiency investments. By encouraging peak load reduction, EBCE hopes to unlock greater load shifting potential and maximize energy reductions when they are the most valuable for avoided GHG emissions.

E. Program Process

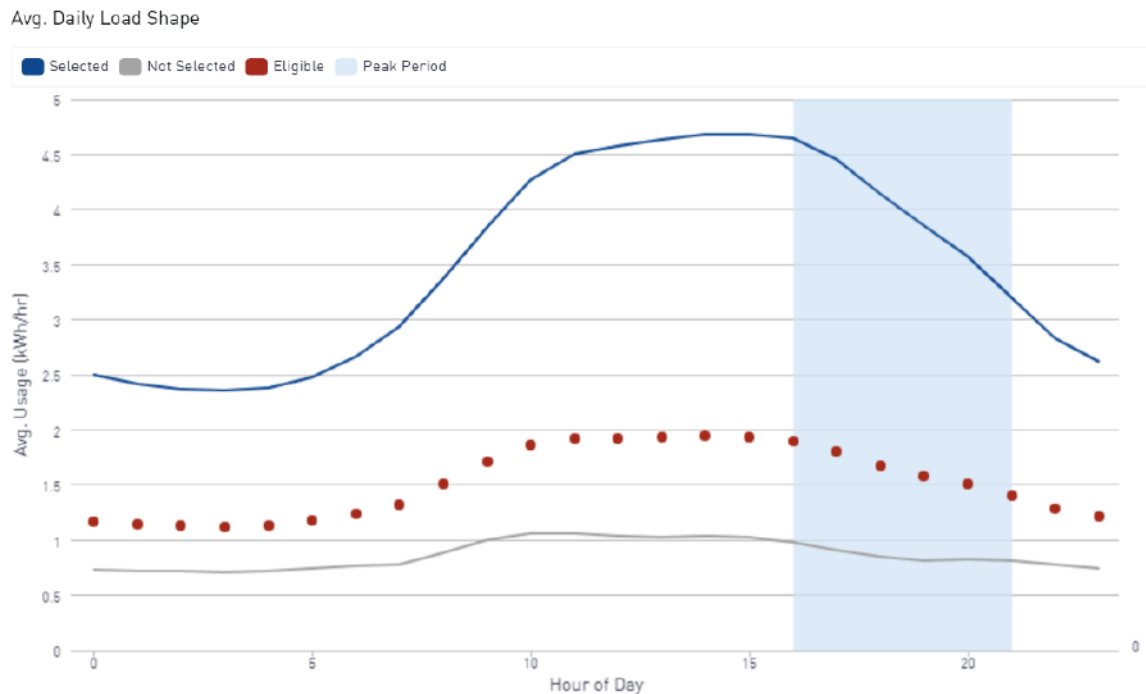
The following tasks outline expected program processes.

Task 1: Customer Acquisition

EBCE intends to leverage its best-in-class data and analytics capabilities to facilitate targeted program marketing. For example, by filtering customers on characteristics such as high peak load contributors, EBCE can ensure that the program is delivered to customers who will benefit the most from participating. This in turn increases the chances that marketing activities will focus on the customers who can most benefit from the program, improving the cost-effectiveness of marketing expenditures.

Figure 1 below demonstrates the average daily load shape of the top 25% of commercial accounts that contribute to peak usage during summer months (blue line; target population) relative to the customers who have been filtered out (gray line). The red dotted line shows the average daily load shape for all commercial customers. Marketing targeted to top peak contributors will be more effective than targeting the general population.

Figure 1: Average Daily Load Shape for Top 25% of Commercial Accounts



Task 2: Interventions

EBCE's Commercial P4P Program will work with energy efficiency aggregators to deliver cost-effective, high performing, installed measures that lower baseload consumption. While aggregators will be free to enroll any project that meets the minimum criteria, EBCE expects most savings for this program to come through refrigeration and lighting measures with improvements to HVAC systems (via retrocommissioning, building envelope, and / or controls) making up most remaining savings. EBCE is also targeting building electrification opportunities but expects these to be a relatively minor portion of the portfolio in the first few years, with saturation increasing over time.

Task 3: Measurement

Once a project has been performed on a property, the actual meter-based consumption post-intervention will be compared against the expected baseline in a “no-intervention” scenario, and the difference will be attributed to the project and will become the basis of incentive payments. Individual project impacts will be calculated by comparing the treatment group (*i.e.*, participating customers) to the control group (*i.e.*, non-participating customers), using 14 months of pre- and post-project data to minimize the noise from non-routine events. In the event that there are lingering impacts associated with the novel coronavirus pandemic, modifications may be made to the control and treatment group selection and measurement as developed in the CalTRACK methodology.⁹

Task 4: Incentive Processing and Reporting

When a project is successfully submitted to the program and passes final QA / QC verification checks, the meter will be assigned to a control group for the purposes of tracking incentive payments. Incentives will be paid on the project following final verification of program impacts, no less than 14 months following project completion. Aggregators will be providing monthly submissions of project enrollments, including anticipated energy savings impacts of the project, and this information will be captured for the purposes of program reporting, incentive reservations, and final incentive payment verification. Once the measurement and verification of savings has been completed, EBCE will issue incentives on portfolios of projects for aggregators. While initial incentives aren’t expected to be processed for a full 17 months following approval of the program, eventually EBCE envisions this settlement occurring on a quarterly basis.

F. Commencement Date & Activities

The program is anticipated to launch within three months of CPUC approval and will run for a minimum of three years. EBCE is leveraging its experience and existing resources from current pilots of similar program concepts, which should support the timely and efficient launch of the proposed program. Given the necessary lag in quantifying program impacts from P4P programs, the initial savings results will not be available until a minimum of 14 months following program rollout, and the final savings figures and incentive spend from the initial three-year implementation will not be available until 14 months after the final project is completed. Below is a high-level schedule of tasks for the initial program launch. Once the program is enrolling customers, tasks 1-4 will be continuously operational. Time brackets identified around tasks 3 and 4 represent estimated time for a single project (*i.e.*, measurement begins with project interventions but continues a full 14 months following project completion).

Task 0: Administrative (0-3 months)

Task 1: Customer Acquisition (starting at 3 months)

Task 2: Interventions (starting at 5 months)

⁹ <https://grid.recurve.com/>

Task 3: Measurement (5-19 months)

Task 4: Incentive Processing and Reporting (19 months)

G. Cost-Effectiveness Analysis

EBCE has performed a cost-effectiveness analysis for the program. Staff have taken steps to ensure the effort was advanced in accordance with the methodologies included in the California Standard Practices manual. Labor and material costs were estimated based on EBCE internal data and recently approved Advice Letters for similar programs.

The first-year Total Resource Cost for the Commercial P4P Program is 1.07 with a Program Administrator Cost of 1.57. The full results of the calculation can be found in Appendix A: Cost-Effectiveness Calculations. EBCE forecasts that Total Resource Cost will improve in subsequent implementation years, after the program is ramped up.

EBCE's Commercial P4P Program will have energy efficiency aggregators deliver cost-effective, high performing, installed measures that lower baseload consumption. The program is a meter-based pay for performance program for electric savings for EBCE customers. EBCE will pay only for measured and delivered energy efficiency that is valued at a TRC ratio of 1.0 or above.

Therefore, incentives will not be paid out until a TRC of 1.0 is reached.

An ECBE-approved third party vendor will calculate energy savings by leveraging the CalTRACK methodology, or other mutually agreed upon approach, for meter-based energy savings. EBCE and its third-party vendor will track program participants using the approved methodology.

H. Demand Reduction, Energy Savings, and Other Measures of Success

EBCE expects that first-year gross energy savings for the program will be 9,011,867kWh with demand savings of 1029 kW.

Additional measures of success will include, but not be limited to:

- 60% of projects will include demand control strategies
- 50% of projects will include "high opportunity" projects as identified by EBCE staff (for example, customers in the top 25% of peak demand users)
- 30% of projects will include building electrification measures

I. Budget

The three-year budget for the EBCE Commercial P4P Program is \$13,463,050. The budget breakdown is shown below.

Table 5: EBCE Three-Year Program Budget - Commercial P4P Program

Program Function	Budget Amount
Administration	\$1,292,454
Marketing, Education and Outreach	\$775,473

Direct Implementation Non-Incentive	\$2,584,905
Direct Implementation Incentive	\$8,271,696
EM&V	\$538,521
Three-Year Program Budget	\$13,463,049

J. Collaboration with Existing Programs

EBCE has a long history of collaborating and partnering with PG&E. EBCE will make every effort to differentiate its locally administered program from PG&E’s. In addition, EBCE will continue to work to bring regional and statewide programs to its constituents.

EBCE will provide program delivery information to PG&E through the assigned PG&E representative. EBCE will also provide PG&E all necessary information regarding locally funded programs and statewide and regional program referrals. EBCE plans to maintain a strong partnership with PG&E to collectively direct customers to the very best service, while reducing confusion at every step.

EBCE’s Commercial P4P program has the potential to overlap with programs offered by both BayREN and the PG&E Commercial Program. To ensure that customers are not double-counted, EBCE will work closely with both BayREN and PG&E to define target markets and to develop systems on the back end to coordinate treatment and control groups and to check for dual enrollment. EBCE will also ask customers for forms verifying that they have not been enrolled in more than one program for the same measure.

Consistency with Commission Requirements

EBCE’s program will deliver cost-effective energy savings to its customers while remaining consistent with CPUC goals, supporting EBCE’s goal of providing 100% clean energy by 2030, and aligning to its statement of intent to implement a CCA program that includes universal access, reliability, and equitable treatment of all customer classes.

EBCE has and will continue to prioritize advancing the public interest as aligned with Public Utilities Code sections 399.4 and 381.1. EBCE’s program is consistent with broader regional or statewide energy efficiency programs and are designed to integrate demand side management activities in a way that will value stack the deployment of distributed energy resources. This will support relevant rulings and decisions such as, but not limited to, D.07-10-032 and D.12-11-015.

EBCE’s Plan is consistent with the “elect to administer” pathway for CCA program administration as defined in D.14-01-033.

EBCE’s programs will fully follow Public Utilities Code Section 399.4 requirements that participants comply with applicable permitting requirements. Participating contractors will be required to pull permits as required by code. EBCE will comply with Section 399.4(b)(1) by requiring all installing contractors or non-residential customers who receive a rebate or incentive to certify that they have complied with Title 24.

EBCE's Plan will show that it complies with Section 399.4(c) by prioritizing local and regional interests in its program portfolio design, and by proposing to incorporate local governments, community-based organizations, and energy efficiency service providers as participants in program implementation where appropriate.

EBCE's proposed Commercial Pay-for-Performance Program supports the mandate set forth in Section 399.4(d)(2) by providing incentives that are linked to measured energy savings. EBCE's program will fulfill the Section 399.4 requirement that incentives be based on values and methodology stated in customer agreements and derived from measured results. EBCE understands that cost-effectiveness calculations require specific inputs: costs (project costs and incentives) and benefits (energy savings). EBCE is committed to accurately forecasting portfolio averaged incentive values to ensure cost-effectiveness calculations are accurate, achievable, and based on realistic and timebound values.

Compliance with Section 399.4(d)(2) will also support the goals noted in D.07-10-032 for overcoming barriers to more widespread adoption of energy efficiency and capturing longer-term savings, and the roadmap for energy efficiency beyond 2020 as established in the subsequent California Long-Term Energy Efficiency Strategic Plan (Strategic Plan) adopted in D.08-09-040.

By acting as point of contact for EBCE customers, EBCE will simplify the goals set forth in Section 381.1 ensuring that local and statewide goals are met, such as those associated with Senate Bill 350. The proposed Plan also supports the State's goals to decarbonize California as detailed in the 2021 Integrated Energy Policy Report ("IEPR") Final Scoping Order. The California Energy Commission is committed to advancing building decarbonization incentive programs, while assessing existing and future policies and programs in an equitable manner. EBCE's Plan aligns with such goals as we enroll customers into Energy Efficiency incentive programs that save customers money and reduce emissions.

Accommodation of Statewide and Regional Programs

EBCE has targeted a portfolio of customers based on how it can best serve its constituents and on how these programs can facilitate the low carbon and high renewable energy content of EBCE's load. While avoiding selection of target sectors that are currently served by statewide programs, EBCE has selected some measures which may overlap with statewide programs (*e.g.*, lighting measures). These measures were included to achieve the required TRC. Given the presence of both BayREN and PG&E in EBCE's service area, some customer sectors were not targeted for this program given the prevalence of programs that are available to serve them. For example, EBCE has opted to not pursue programs targeted to the small commercial sector given BayREN's programs in these areas.

EBCE has a target of achieving a 100% carbon free electricity product by 2030, and the engagement of the major customers contributing to its load (non-residential accounts) will be an important component of meeting these resource targets. By reducing energy use when it is both most expensive and most GHG intensive, EBCE will engage its customers in helping to accomplish the targets for carbon-free electricity and will reduce costs for all customers.

In the instances of program overlap with existing regional programs (for example, BayREN Small Business and the PG&E commercial pay-for-performance program), EBCE plans to work directly with program staff at each PA to develop systems for verifying that customers have not dual enrolled in programs and to establish referral mechanisms for non-CCA or non-eligible customers.

The rollout of third-party programs has increased the difficulty of local coordination, both because there are many programs for which details are still forthcoming, and because these implementers are under no obligation to coordinate with a CCA Administrator to minimize overlap and reduce customer confusion. EBCE plans to coordinate closely with PG&E to encourage collaboration between selected third-party vendors – particularly those whose programs have not yet launched – and to minimize customer confusion to the greatest extent possible. EBCE will additionally be requesting customer signatures verifying that customers have not requested funding from other programs for the same scope of work.

EBCE is a public agency and is committed to supporting the best interests of its customers and constituents. To that end, EBCE will consistently recommend leveraging statewide and regional programs when and where they are staged to provide the best service to its customer base. EBCE will continue coordination with PG&E and BayREN to ensure that both PAs understand what EBCE is offering to its customers, and to ensure EBCE's information on PG&E/BayREN programs is up to date. This will enable all PAs to help navigate which offerings may be best suited to serve potential customers. In the instances where EBCE receives program applications from non-CCA customers who are not eligible for enrollment in the CCA product, EBCE will work with BayREN and/or PG&E staff to help those customers find the best suited program for their needs.

Auditing and Reporting

EBCE performs annual financial audits using generally accepted accounting principles specific to government entities. These reports are publicly available and will be provided to the CPUC upon request. As a Joint Powers Authority, once EBCE's energy efficiency plan is certified and the program begins, current auditing procedures will be extended to include energy efficiency program administration data. This will ensure appropriate accounting controls for energy efficiency program funds.

Per requirement of the Governmental Accounting Standards Board Statement No. 34, the management's discussion and analysis will be included to supplement the basic financial statements. To evaluate the effective use of resources and management procedures, EBCE will also complete all regulatory filings and reports as directed by CPUC staff. These documents will provide the results of program efforts that can be evaluated against the performance metrics identified by EBCE, including adherence to cost-effectiveness requirements.

EBCE will take all necessary actions to remain compliant with additional auditing and reporting requirements.

Evaluation, Measurement and Verification Protocols

EBCE will contract with an independent third-party to perform process evaluation or market studies to assess the effectiveness of program implementation activities and evaluate challenges and opportunities in the EBCE service territory. EBCE-led studies will be performed according to the Commission oversight process of IOU Evaluation Measurement and Verification (EM&V) projects as detailed in the Energy Efficiency EM&V Plan. EBCE will be subject to the same protocol as IOUs for CPUC-directed impact evaluations to determine actual energy savings, benefits, costs, and goal achievement as directed in D. 05-01-055. EBCE expects to dedicate no more than 3% of total program budget during the three-year program to evaluate the program and market.

Evaluations directed by EBCE will focus on market conditions and needs, program design flaws or opportunities for improvement, and solutions to address those challenges. These evaluations will measure indirect program impact (*e.g.*, behavioral changes), and market impacts resulting from induced market changes (*e.g.*, job creation), while CPUC-directed impact evaluations will measure direct program impacts (*e.g.*, energy savings). EBCE will avoid duplication and build on existing efforts by referring to existing EM&V studies led by IOUs and the CPUC.

Data sources for program EM&V activities could include but not be limited to program databases, program descriptions, implementation plans, surveys and actual energy savings at the meter, interviews, marketing collateral, and work papers developed for or used during program implementation. Objectives include, but will not be limited to:

- Compare EBCE's program to other similar program offerings.
- Evaluate successes, failures, and replicability of the program.
- Evaluate the unique challenges and opportunities of the EBCE market and determine viable solutions.
- Compare *ex ante* and *ex post* data.

Performance Metrics

The following Performance Metrics will indicate progress toward meeting the goals and objectives of the CPUC Energy Efficiency Strategic Plan and EBCE goals. The specific objective of Public Utilities Code Section 381.1(f) that each metric addresses (if applicable) is included in parenthesis.

- Program energy savings (381.1(f)(2))
- Tracking and serving underserved communities, including hard-to-reach (HTR) commercial customers (381.1(f)(1))
- Cost-effectiveness tool ("CET") output
- Tracking the Program cost-effectiveness annually (381.1(f)(2))
- Number of projects referred to other EE or other DER programs (381.1(f)(3))

- Percentage of recommended measures installed by customers (381.1(f)(4))
- Percentage of customers who receive electrification measures
- Percentage of customers who receive TOU education and peak management tools
- Increase in participation among disadvantaged community customers relative to existing IOU program baseline
- Percent of budget contracted with local and / or Disabled Veteran Business Enterprise (DVBE) businesses
- EM&V process, tracking, and incorporation into program design (381.1(f)(5))
- EM&V of project energy savings forecasts and energy savings realized (381.1(f)(5))

Within this section EBCE summarizes the specific metrics to be used as targets against which to measure performance of the program and portfolio.

Table 6: Installation Metrics – Commercial P4P Program

Commercial P4P				
	Year 1	Year 2	Year 3	Total
Projects Completed	257	257	350	864

Table 7: Market Penetration – Commercial P4P Program

Commercial P4P				
	Year 1	Year 2	Year 3	Total
Market Penetration	0.78%	0.78%	1.07%	2.63%

Market penetration calculated based on 32,750 targeted non-residential customer accounts.

Table 8: Savings Metrics – Commercial P4P Program

Commercial P4P				
	Year 1	Year 2	Year 3	Total
Gross kWh	9,011,867	9,011,867	12,304,105	30,327,839
Net kWh	8,561,274	8,561,274	11,688,900	28,811,448
Gross kW	1029	1029	1,405	3,463
Net kW	977	977	1,334	3,288

Table 9: Portfolio Savings Metrics

Commercial P4P				
	Year 1	Year 2	Year 3	Total
Gross kWh	9,011,867	9,011,867	12,304,105	30,327,839
Net kWh	8,561,274	8,561,274	11,688,900	28,811,448
Gross kW	1029	1029	1,405	3,463
Net kW	977	977	1,334	3,288

Funding Determination

EBCE’s budget conforms to CPUC guidance as described below and elsewhere in this Advice Letter and Program Plan. In accordance with D.14-01-033 EBCE has proposed a resource acquisition program (Commercial P4P Program) that has a three-year budget of \$13,463,049.

Given the uncertainty surrounding the ongoing COVID-19 pandemic, EBCE proposes that administration, marketing, education and outreach, and direct implementation non-incentive costs may remain constant across the three-year program period. Moreover, EBCE is leveraging its experience and existing resources from current pilots of similar program concepts, which should support the timely and efficient launch of the proposed program.

Resolution E-4518 states that “funding collection and program periods do not always correspond” and that there is no statutory requirement for funding collection to begin subsequent to Commission certification of the plan. Marin Energy Authority (now referred to as MCE) was provided a collection period starting on the original draft submittal date. Based on this precedent, EBCE finds it reasonable to request the CPUC to direct transfer of energy efficiency funds collected from EBCE’s customers beginning on October 22, 2021, EBCE’s advice letter filing date.

To calculate energy efficiency non-bypassable charge collections from EBCE’s customers in 2021, EBCE used fee per kWh data and load data from PG&E, SMUD, and CAISO. To determine the portion of funding used for statewide and regional programs, EBCE used the program budget from PG&E’s 2021 Annual Budget Advice Letter (ABAL), the most recently approved program budgets. Under this budget, 96.63% of funds are budgeted to go to statewide, regional and uncategorized programs, and 3.37% are budgeted to go to local programs.¹⁰ EBCE’s first-

¹⁰ To calculate energy efficiency non-bypassable charge collections from EBCE’s customers in 2021, EBCE used fee per kWh data and load data from PG&E, SMUD, and CAISO as well as PG&E’s 2021 ABAL program budget. PG&E programs included as local or other programs, consistent with communications with PG&E and CPUC, and therefore eligible to be included in EBCE’s funding determination are: PGE2110051 (Local Government Energy Action Resources), PGE_Pub_001 (Central Coast Leaders in Energy Action Program), PGE_Pub_002 (Marin Energy Watch Partnership), PGE_Pub_003 (Redwood Coast Energy Watch), PGE_Pub_004 (Central California Energy Watch), PGE_Pub_005 (San Mateo County Energy Watch Program), PGE_Pub_006 (Energy Access SF), PGE_Pub_007 (Sierra Nevada Energy Watch), and PGE_Pub_008 (Sonoma Public Energy).

year not to exceed value is 3.37% of the total non-bypassable funds collected from EBCE customers for EE programs. EBCE’s three-year not to exceed budget for its Commercial P4P Program is \$13,463,049.

EBCE plans to hire one or two staff to support administration of the program but will be allocating the majority of funding under this program to third party implementers and incentives. Marketing and outreach dollars will be administered in house and EBCE will design and implement marketing campaigns with the assistance of the EBCE marketing and data and analytics teams.

Table 10: Program Portfolio Funding Determination

	Year 1	Year 2	Year 3	Total
Administration	\$430,818	\$430,818	\$430,818	\$1,292,454
Marketing, Education and Outreach	\$258,491	\$258,491	\$258,491	\$775,473
Direct Implementation Non-Incentive	\$861,635	\$861,635	\$861,635	\$2,584,905
Direct Implementation Incentive	\$2,757,232	\$2,757,232	\$2,757,232	\$8,271,696
EM&V	\$179,507	\$179,507	\$179,507	\$538,521
Portfolio Budget	\$4,487,683	\$4,487,683	\$4,487,683	\$13,463,049

Appendix A: Cost-Effectiveness Calculations (Clean)

This appendix contains first-year cost-effectiveness measure and program cost input and output tables.

CEInputID	PrgID	ClaimYearQuarter	Sector	DeliveryType	BldgType	E3ClimateZone	E3GasSavProfile	E3GasSector
1	EBCE-COM-001	2022Q3	Com	DnCust	Com	3A	Annual	Commercial
2	EBCE-COM-001	2022Q3	Com	DnCust	Com	3A	Annual	Commercial
3	EBCE-COM-001	2022Q3	Com	DnCust	Com	3A	Annual	Commercial
4	EBCE-COM-001	2022Q3	Com	DnCust	Com	12	Annual	Commercial
5	EBCE-COM-001	2022Q3	Com	DnCust	Com	12	Annual	Commercial
6	EBCE-COM-001	2022Q3	Com	DnCust	Com	12	Annual	Commercial

E3MeaElecEndUseShape	E3TargetSector	MeasAppType	MeasCode	MeasDescription	MeasImpactType	MeasureID
DEER:Indoor_Non-CFL_Ltg	Non_Res	NR	MBCAP	DEER:Indoor_Non-CFL_Ltg	Cust-NMEC	
DEER:HVAC_Chillers	Non_Res	NR	MBCAP	DEER:HVAC_Chillers	Cust-NMEC	
DEER:HVAC_Split-Package_HP	Non_Res	NR	MBCAP	DEER:HVAC_Split-Package_HP	Cust-NMEC	
DEER:Indoor_Non-CFL_Ltg	Non_Res	NR	MBCAP	DEER:Indoor_Non-CFL_Ltg	Cust-NMEC	
DEER:HVAC_Chillers	Non_Res	NR	MBCAP	DEER:HVAC_Chillers	Cust-NMEC	
DEER:HVAC_Split-Package_HP	Non_Res	NR	MBCAP	DEER:HVAC_Split-Package_HP	Cust-NMEC	

TechGroup	TechType	UseCategory	UseSubCategory	PreDesc	StdDesc	SourceDesc	Version	NormUnit	NumUnits
Ltg_Lamp	LED_lamp	Lighting	InGen					Each	1036.80160
HV_Tech	RoomAC	HVAC	HeatCool					Each	802.751344
HV_Tech	HP_EF	HVAC	HeatCool					Each	135.502784
Ltg_Lamp	LED_lamp	Lighting	InGen					Each	291.536293
HV_Tech	RoomAC	HVAC	HeatCool					Each	225.837974
HV_Tech	HP_EF	HVAC	HeatCool					Each	36.9553048

UnitkW1stBaseline	UnitkWh1stBaseline	UnitTherm1stBaseline	UnitkW2ndBaseline	UnitkWh2ndBaseline	UnitTherm2ndBaseline
0.6884703	603	-49	0	0	0
0.24132420	211	64	0	0	0
-	-	19	0	0	0
0.6884703	603	-49	0	0	0
0.24132420	211	64	0	0	0
-	-	19	0	0	0

UnitMeaCost1stBaseline	UnitMeaCost2ndBaseline	UnitDirectInstallLab	UnitDirectInstallMat	UnitEndUserRebate
203	0	0	0	1144.
203	0	0	0	1144.
175	0	0	0	1012.
203	0	0	0	1144.
203	0	0	0	1144.
175	0	0	0	1012.

UnitIncentiveToOthers	NTG_ID	NTGRkW	NTGRkWh	NTGRTherm	NTGRCost	EUL_ID	EUL_Yrs
0	NonRes-sAll-mCust-Elec	0.95	0.95	0.9	0.9	Nonres-RCx-Operational	10
0	NonRes-sAll-mCust-Elec	0.95	0.95	0.9	0.9	Nonres-RCx-Operational	7
0	NonRes-sAll-mCust-Elec	0.95	0.95	0.9	0.9	Nonres-RCx-Operational	13
0	NonRes-sAll-mCust-Elec	0.95	0.95	0.9	0.9	Nonres-RCx-Operational	10
0	NonRes-sAll-mCust-Elec	0.95	0.95	0.9	0.9	Nonres-RCx-Operational	7
0	NonRes-sAll-mCust-Elec	0.95	0.95	0.9	0.9	Nonres-RCx-Operational	13

RUL_ID	RUL_Yrs	GSIA_ID	RealizationRatekW	RealizationRatekWh	RealizationRateTherm	InstallationRatekW	InstallationRatekWh
	0		0.9	0.9	0.9	1	1
	0		0.9	0.9	0.9	1	1
	0		0.9	0.9	0.9	1	1
	0		0.9	0.9	0.9	1	1
	0		0.9	0.9	0.9	1	1
	0		0.9	0.9	0.9	1	1

InstallationRateTherm	Residential_Flag	Upstream_Flag	PA	UnitGasInfraBens	UnitRefrigCosts	UnitRefrigBens	UnitMiscCosts
1	0	0	PGE	0	0	0	0
1	0	0	PGE	0	0	0	0
1	0	0	PGE	0	0	0	0
1	0	0	PGE	0	0	0	0
1	0	0	PGE	0	0	0	0
1	0	0	PGE	0	0	0	0

MiscCostsDesc	UnitMiscBens	MiscBensDesc	RateScheduleElec	RateScheduleGas	CombustionType	MeasInflation	Comments
0	0					0	
0	0					0	
0	0					0	
0	0					0	
0	0					0	
0	0					0	

PrgID	PrgYear	ClaimYearQuarter	AdminCostsOverheadAndGA	AdminCostsOther	MarketingOutreach	DIActivity
EBCE-COM-001	202	2022Q3	43081	0	25849	86163

DIInstallation	DIHardwareAndMaterials	DIRebateAndInspection	EMV	UserInputIncentive	OnBillFinancing
0	0	0	17950	0	0

CostsRecoveredFromOtherSources	PA
0	PGE

JobID	PA	PrgID	CET_ID	GrossKWh	GrossKW	GrossThm	NetKWh	NetKW	NetThm
6119	PGE	EBCE-COM-001	6	-	-	6319.35713	-	-	6003.38927
6119	PGE	EBCE-COM-001	5	429679.329	49.0501517	13008.2673	408195.36	46.597644	12357.8539
6119	PGE	EBCE-COM-001	4	1582429.8	180.64267	-	1503308.35	171.610543	-
6119	PGE	EBCE-COM-001	3	-	-	23170.9761	-	-	22012.4273
6119	PGE	EBCE-COM-001	2	1527314.70	174.350994	46238.4774	1450948.97	165.633444	43926.5535
6119	PGE	EBCE-COM-001	1	5627655.45	642.42642	-	5346272.68	610.305100	-

LifecycleGrossKWh	LifecycleGrossThm	LifecycleNetKWh	LifecycleNetThm	GoalAttainmentKWh	GoalAttainmentKW
-	82151.642	-	78044.0605	-	-
3007755.30	91057.8711	2857367.54	86504.977	429679.329	49.0501517
1582429.8	-	15033083.5	-	1582429.8	180.64267
-	301222.689	-	286161.555	-	-
10691202.9	323669.342	10156642.8	307485.87	1527314.70	174.350994
56276554.5	-	53462726.8	-	5627655.45	642.42642

GoalAttainmentThm	FirstYearGrossKWh	FirstYearGrossKW	FirstYearGrossThm	FirstYearNetKWh	FirstYearNetKW	FirstYearNetThm
6319.35713	-	-	6319.35713	-	-	6003.38927
13008.2673	429679.329	49.0501517	13008.2673	408195.36	46.597644	12357.8539
-	1582429.8	180.64267	-	1503308.35	171.610543	-
23170.9761	-	-	23170.9761	-	-	22012.4273
46238.4774	1527314.70	174.350994	46238.4774	1450948.97	165.633444	43926.5535
-	5627655.45	642.42642	-	5346272.68	610.305100	-

WeightedSavings	ElecBen	GasBen	ElecBenGross	GasBenGross	TRCCost	PACCost	TRCCostGross	TRCCostNoAdmin
0.01573816	-	71503.0796	-	75266.3996	76146.4885	51218.5660	77458.4844	60952.2172
0.06891011	251178.646	86018.042	264398.575	90545.3076	504237.254	320502.973	513907.479	432583.585
0.13447223	1252296.89	-	1318207.25	-	824536.841	587352.588	837020.223	558426.083
0.05770660	-	262177.958	-	275976.798	279203.791	187801.408	284014.443	223491.463
0.24494414	898535.298	305755.041	945826.630	321847.411	1793547.47	1140455.62	1827920.7	1537638.01
0.4782287	4475265.08	-	4710805.35	-	2936937.41	2093430.03	2981332.54	1985951.91

PACCostNoAdmin	TRCRatio	PACRatio	TRCRatioNoAdmin	PACRatioNoAdmin	BillReducElec	BillReducGas	RIMCost
36024.2947	0.49291176	0.73281044	0.61578563	1.04189409	-	0	-
248849.305	0.66872625	1.0520859	0.77949487	1.35502362	438679.566	0	759182.540
321241.830	1.37711768	1.93322424	2.03336538	3.53467126	2159916.64	0	2747269.23
132089.080	0.48980692	0.72819448	0.61190681	1.03533122	-	0	-
884546.167	0.67145718	1.05597299	0.78320796	1.36147821	1559306.4	0	2699762.08
1142444.53	1.38233790	1.93932437	2.04427905	3.55364288	7681393.69	0	9774823.73

WeightedBenefits	WeightedElecAlloc	WeightedProgramCost	ElecSupplyCost	GasSupplyCost	ElecSupplyCostGross
0.00940492	0	15194.271	0	0	0
0.04435205	0.7449024	71653.6685	0	0	0
0.16471673	1	266110.75	0	0	0
0.03448471	0	55712.3281	0	0	0
0.15840235	0.74611185	255909.455	0	0	0
0.5886392	1	950985.498	0	0	0

GasSupplyCostGross	TotalSystemBenefit	TotalSystemBenefitGross	OtherBen	OtherCost	OtherBenGross	OtherCostGross
0	37533.5000	39508.9474	0	0	0	0
0	337196.688	354943.882	0	0	0	0
0	1135484.26	1195246.59	0	0	0	0
0	136755.950	143953.631	0	0	0	0
0	1204290.3	1267674.04	0	0	0	0
0	4059839.90	4273515.68	0	0	0	0

NetElecCO2	NetGasCO2	GrossElecCO2	GrossGasCO2	NetElecCO2Lifecycle	NetGasCO2Lifecycle	GrossElecCO2Lifecycle
-	35.1198272	-	36.9682392	-	456.557754	-
102.731547	72.2934455	108.138471	76.0983637	764.709764	506.05411	804.957646
376.858659	-	396.693325	-	4261.99795	-	4486.31363
-	128.772	-	135.550210	-	1674.04509	-
365.163955	256.970338	384.383110	270.49509	2718.19561	1798.79236	2861.25854
1340.23678	-	1410.77556	-	15157.1054	-	15954.847

GrossGasCO2Lifecycle	NetElecNOx	NetGasNOx	GrossElecNOx	GrossGasNOx	NetElecNOxLifecycle	NetGasNOxLifecycle
480.587109	-	0	-	0	-	0
532.688546	57.7278046	0	60.7661101	0	404.094632	0
-	219.158305	0	230.692953	0	2191.58305	0
1762.15273	-	0	-	0	-	0
1893.46565	205.196105	0	215.995900	0	1436.37273	0
-	779.401016	0	820.422122	0	7794.01016	0

GrossElecNOxLifecycle	GrossGasNOxLifecycle	NetPM10	GrossPM10	NetPM10Lifecycle	GrossPM10Lifecycle	IncentiveToOthers
-	0	-	-	-	-	0
425.36277	0	24.3662833	25.6487193	170.563983	179.541035	0
2306.92953	0	92.2693086	97.125588	922.693086	971.25588	0
-	0	-	-	-	-	0
1511.97130	0	86.6110617	91.1695386	606.277432	638.186770	0
8204.22122	0	328.140851	345.411422	3281.40851	3454.11422	0

DILaborCost	DIMaterialCost	EndUserRebate	RebatesandIncents	GrossMeasureCost	ExcessIncentives	MarkEffectPlusExcessInc
0	0	37417.2461	37417.2461	64671.7835	0	0
0	0	258471.561	258471.561	459354.439	0	0
0	0	333663.288	333663.288	592984.821	0	0
0	0	137196.569	137196.569	237129.872	0	0
0	0	918748.913	918748.913	1632796.23	0	0
0	0	1186619.44	1186619.44	2108854.47	0	0

GrossParticipantCost	GrossParticipantCostAdjusted	NetParticipantCost	NetParticipantCostAdjusted	RebatesandIncentsPV
27254.5373	27254.5373	25891.8104	25891.8104	36024.2947
200882.87	200882.87	190838.734	190838.734	248849.305
259321.533	259321.533	246355.456	246355.456	321241.830
99933.3035	99933.3035	94936.6383	94936.6383	132089.080
714047.320	714047.320	678344.954	678344.954	884546.167
922235.031	922235.031	876123.279	876123.279	1142444.53

GrossMeasCostPV	ExcessIncentivesPV	MarkEffectPlusExcessIncPV	GrossParticipantCostPV	GrossParticipantCostAdjustedPV
62264.2131	0	0	26239.9184	26239.9184
442253.811	0	0	193404.505	193404.505
570909.465	0	0	249667.63	249667.63
228302.11	0	0	96213.0341	96213.0341
1572011.27	0	0	687465.107	687465.107
2030347.04	0	0	887902.50	887902.50

NetParticipantCostPV	NetParticipantCostAdjustedPV	WtdAdminCostsOverheadAndGA	WtdAdminCostsOther
24927.9224	24927.9224	4051.80949	0
183734.280	183734.280	19107.6629	0
237184.253	237184.253	70962.9355	0
91402.3824	91402.3824	14856.6348	0
653091.852	653091.852	68242.585	0
843507.379	843507.379	253596.371	0

WtdMarketingOutreach	WtdDIActivity	WtdDIInstallation	WtdDIHardwareAndMaterials	WtdDIRebateAndInspection	WtdEMV
2431.08757	8103.60958	0	0	0	1688.24925
11464.6066	38215.2815	0	0	0	7961.50404
42577.7942	141925.706	0	0	0	29567.8074
8913.98778	29713.2351	0	0	0	6190.24726
40945.5830	136485.012	0	0	0	28434.3314
152157.940	507192.154	0	0	0	105664.860

WtdUserInputIncentive	WtdCostsRecoveredFromOtherSources	ProgramCosts	TotalExpenditures	DiscountedSavingsGrosskWh
-	0	15194.271	52611.5174	-
-	0	71653.6685	330125.229	2345978.89
-	0	266110.75	599774.046	11176819.7
-	0	55712.3281	192908.897	-
-	0	255909.455	1174658.36	8338888.62
-	0	950985.498	2137604.9	39748548.9

DiscountedSavingsNetkWh	DiscountedSavingsGrossThm	DiscountedSavingsNetThm	TRCLifecycleNetBen	PACLifecycleNetBen
-	52753.1907	50115.5312	-	-
2228679.95	71023.0129	67471.8622	-	16693.7148
10617978.7	-	-	310947.424	548131.677
-	193428.366	183756.947	-	-
7921944.1	252454.527	239831.801	-	63834.7176
37761121.5	-	-	1122902.48	1966409.86

LevBenElec	LevBenGas	LevTRCCost	LevTRCCostNoAdmin	LevPACCost	LevPACCostNoAdmin	LevRIMCost	LevNetBenTRCElec
0.12878682	1.42676487	0	0	0	0	0	0.12878682
0.11270287	1.27487280	0.16853365	0.14458450	0.10712325	0.08317410	0.25374524	-
0.11794117	1.35407020	0.07765478	0.05259250	0.05531679	0.03025451	0.25873749	0.04028639
0.1296831	1.42676487	0	0	0	0	0	0.1296831
0.11342358	1.27487280	0.16892154	0.14481924	0.10741144	0.08330914	0.25427148	-
0.11851515	1.35407020	0.07777675	0.05259250	0.05543876	0.03025451	0.25885946	0.040738

LevNetBenTRCElecNoAdmin	LevNetBenPACElec	LevNetBenPACElecNoAdmin	LevNetBenTRCGas	LevNetBenTRCGasNoAdmin
0.12878682	0.12878682	0.12878682	-	0.2105307
-	0.00557962	0.02952877	-	-
0.06534867	0.06262437	0.08768665	1.35407020	1.35407020
0.1296831	0.1296831	0.1296831	-	0.2105307
-	0.0060121	0.03011444	-	-
0.06592264	0.06307638	0.08826063	1.35407020	1.35407020

LevNetBenPACGas	LevNetBenPACGasNoAdmin	LevNetBenRIMElec	LevNetBenRIMGas
0.40475503	0.70793991	0.12878682	1.50866339
0.06311557	0.33402367	-	-
1.35407020	1.35407020	-	1.35407020
0.40475503	0.70793991	0.1296831	1.50866339
0.06757601	0.33848411	-	-
1.35407020	1.35407020	-	1.35407020

CEInputID	PrgID	ClaimYearQuarter	Sector	DeliveryType	BldgType	E3ClimateZone	E3GasSavProfile	E3GasSector
1	EBCE-COM-001	2023Q3	Com	DnCust	Com	3A	Annual	Commercial
2	EBCE-COM-001	2023Q3	Com	DnCust	Com	3A	Annual	Commercial
3	EBCE-COM-001	2023Q3	Com	DnCust	Com	3A	Annual	Commercial
4	EBCE-COM-001	2023Q3	Com	DnCust	Com	12	Annual	Commercial
5	EBCE-COM-001	2023Q3	Com	DnCust	Com	12	Annual	Commercial
6	EBCE-COM-001	2023Q3	Com	DnCust	Com	12	Annual	Commercial

E3MeaElecEndUseShape	E3TargetSector	MeasAppType	MeasCode	MeasDescription	MeasImpactType	MeasureID
DEER:Indoor_Non-CFL_Ltg	Non_Res	NR	MBCAP	DEER:Indoor_Non-CFL_Ltg	Cust-NMEC	
DEER:HVAC_Chillers	Non_Res	NR	MBCAP	DEER:HVAC_Chillers	Cust-NMEC	
DEER:HVAC_Split-Package_HP	Non_Res	NR	MBCAP	DEER:HVAC_Split-Package_HP	Cust-NMEC	
DEER:Indoor_Non-CFL_Ltg	Non_Res	NR	MBCAP	DEER:Indoor_Non-CFL_Ltg	Cust-NMEC	
DEER:HVAC_Chillers	Non_Res	NR	MBCAP	DEER:HVAC_Chillers	Cust-NMEC	
DEER:HVAC_Split-Package_HP	Non_Res	NR	MBCAP	DEER:HVAC_Split-Package_HP	Cust-NMEC	

TechGroup	TechType	UseCategory	UseSubCategory	PreDesc	StdDesc	SourceDesc	Version	NormUnit	NumUnits
Ltg_Lamp	LED_lamp	Lighting	InGen					Each	1036.80160
HV_Tech	RoomAC	HVAC	HeatCool					Each	802.751344
HV_Tech	HP_EF	HVAC	HeatCool					Each	135.502784
Ltg_Lamp	LED_lamp	Lighting	InGen					Each	291.536293
HV_Tech	RoomAC	HVAC	HeatCool					Each	225.837974
HV_Tech	HP_EF	HVAC	HeatCool					Each	36.9553048

UnitkW1stBaseline	UnitkWh1stBaseline	UnitTherm1stBaseline	UnitkW2ndBaseline	UnitkWh2ndBaseline	UnitTherm2ndBaseline
0.6884703	603	-49	0	0	0
0.24132420	211	64	0	0	0
-	-	19	0	0	0
0.6884703	603	-49	0	0	0
0.24132420	211	64	0	0	0
-	-	19	0	0	0

UnitMeaCost1stBaseline	UnitMeaCost2ndBaseline	UnitDirectInstallLab	UnitDirectInstallMat	UnitEndUserRebate
203	0	0	0	1144.
203	0	0	0	1144.
175	0	0	0	1012.
203	0	0	0	1144.
203	0	0	0	1144.
175	0	0	0	1012.

UnitIncentiveToOthers	NTG_ID	NTGRkW	NTGRkWh	NTGRTherm	NTGRCost	EUL_ID	EUL_Yrs	RUL_ID
0	NonRes-sAll-mCust-Elec	0.9	0.95	0.9	0.95	Nonres-RCx-Operational	10	
0	NonRes-sAll-mCust-Elec	0.9	0.95	0.9	0.95	Nonres-RCx-Operational	7	
0	NonRes-sAll-mCust-Elec	0.9	0.95	0.9	0.95	Nonres-RCx-Operational	13	
0	NonRes-sAll-mCust-Elec	0.9	0.95	0.9	0.95	Nonres-RCx-Operational	10	
0	NonRes-sAll-mCust-Elec	0.9	0.95	0.9	0.95	Nonres-RCx-Operational	7	
0	NonRes-sAll-mCust-Elec	0.9	0.95	0.9	0.95	Nonres-RCx-Operational	13	

RUL_Yrs	GSIA_ID	RealizationRatekW	RealizationRatekWh	RealizationRateTherm	InstallationRatekW	InstallationRatekWh
0		0.9	0.9	0.9	1	1
0		0.9	0.9	0.9	1	1
0		0.9	0.9	0.9	1	1
0		0.9	0.9	0.9	1	1
0		0.9	0.9	0.9	1	1
0		0.9	0.9	0.9	1	1

InstallationRateTherm	Residential_Flag	Upstream_Flag	PA	UnitGasInfraBens	UnitRefrigCosts	UnitRefrigBens	UnitMiscCosts
1	0	0	PGE	0	0	0	0
1	0	0	PGE	0	0	0	0
1	0	0	PGE	0	0	0	0
1	0	0	PGE	0	0	0	0
1	0	0	PGE	0	0	0	0
1	0	0	PGE	0	0	0	0

MiscCostsDesc	UnitMiscBens	MiscBensDesc	RateScheduleElec	RateScheduleGas	CombustionType	MeasInflation	Comments
0	0					0	
0	0					0	
0	0					0	
0	0					0	
0	0					0	
0	0					0	

PrgID	PrgYear	ClaimYearQuarter	AdminCostsOverheadAndGA	AdminCostsOther	MarketingOutreach	DIActivity
EBCE-COM-001	202	2023Q3	43081	0	25849	86163

DIInstallation	DIHardwareAndMaterials	DIRebateAndInspection	EMV	UserInputIncentive	OnBillFinancing
0	0	0	17950	0	0

CostsRecoveredFromOtherSources	PA
0	PGE

JobID	PA	PrgID	CET_ID	GrossKWh	GrossKW	GrossThm	NetKWh	NetKW	NetThm
6119	PGE	EBCE-COM-001	6	-	-	6319.35713	-	-	6003.38927
6119	PGE	EBCE-COM-001	5	429679.329	49.0501517	13008.2673	408195.36	46.597644	12357.8539
6119	PGE	EBCE-COM-001	4	1582429.8	180.64267	-	1503308.35	171.610543	-
6119	PGE	EBCE-COM-001	3	-	-	23170.9761	-	-	22012.4273
6119	PGE	EBCE-COM-001	2	1527314.70	174.350994	46238.4774	1450948.97	165.633444	43926.5535
6119	PGE	EBCE-COM-001	1	5627655.45	642.42642	-	5346272.68	610.305100	-

LifecycleGrossKWh	LifecycleGrossThm	LifecycleNetKWh	LifecycleNetThm	GoalAttainmentKWh	GoalAttainmentKW
-	82151.642	-	78044.0605	-	-
3007755.30	91057.8711	2857367.54	86504.977	429679.329	49.0501517
15824298.	-	15033083.5	-	1582429.8	180.64267
-	301222.689	-	286161.555	-	-
10691202.9	323669.342	10156642.8	307485.87	1527314.70	174.350994
56276554.5	-	53462726.8	-	5627655.45	642.42642

GoalAttainmentThm	FirstYearGrossKWh	FirstYearGrossKW	FirstYearGrossThm	FirstYearNetKWh	FirstYearNetKW	FirstYearNetThm
6319.35713	-	-	6319.35713	-	-	6003.38927
13008.2673	429679.329	49.0501517	13008.2673	408195.36	46.597644	12357.8539
-	1582429.8	180.64267	-	1503308.35	171.610543	-
23170.9761	-	-	23170.9761	-	-	22012.4273
46238.4774	1527314.70	174.350994	46238.4774	1450948.97	165.633444	43926.5535
-	5627655.45	642.42642	-	5346272.68	610.305100	-

WeightedSavings	ElecBen	GasBen	ElecBenGross	GasBenGross	TRCCost	PACCost	TRCCostGross	TRCCostNoAdmin
0.01573816	-	75123.663	-	79077.5403	75970.2373	51042.3148	77282.2332	60952.2172
0.06891011	263640.873	90871.2746	277516.709	95653.9733	503454.338	319720.057	513124.563	432583.585
0.13447223	1334815.36	-	1405068.8	-	825269.886	588085.633	837753.268	558426.083
0.05770660	-	275453.432	-	289950.981	278557.536	187155.154	283368.188	223491.463
0.24494414	944984.491	323006.076	994720.517	340006.396	1791122.83	1138030.98	1825496.08	1537638.01
0.4782287	4773545.25	-	5024784.48	-	2940234.43	2096727.05	2984629.5	1985951.91

PACCostNoAdmin	TRCRatio	PACRatio	TRCRatioNoAdmin	PACRatioNoAdmin	BillReducElec	BillReducGas	RIMCost
36024.2947	0.51271630	0.76311545	0.63904450	1.08124751	-	0	-4280.639218
248849.305	0.70415948	1.10882048	0.81952288	1.42460573	438679.566	0	758399.6244
321241.830	1.46861807	2.06093501	2.17039695	3.77287811	2159916.64	0	2748002.276
132089.080	0.50908167	0.75770575	0.63451433	1.07358258	-	0	-15695.67714
884546.167	0.70793054	1.1141968	0.82463528	1.43349280	1559306.4	0	2697337.44
1142444.539	1.47498258	2.0683639	2.18373594	3.79606575	7681393.69	0	9778120.752

WeightedBenefits	WeightedElecAlloc	WeightedProgramCost	ElecSupplyCost	GasSupplyCost	ElecSupplyCostGross
0.00929582	0	15018.0200	0	0	0
0.04386744	0.74367232	70870.7526	0	0	0
0.16517047	1	266843.802	0	0	0
0.03408469	0	55066.0735	0	0	0
0.15690155	0.74526145	253484.813	0	0	0
0.59068000	1	954282.516	0	0	0

GasSupplyCostGross	TotalSystemBenefit	TotalSystemBenefitGross	OtherBen	OtherCost	OtherBenGross	OtherCostGross
0	38951.1792	41001.2413	0	0	0	0
0	354512.148	373170.682	0	0	0	0
0	1212006.27	1275796.07	0	0	0	0
0	141808.536	149272.14	0	0	0	0
0	1267990.56	1334726.91	0	0	0	0
0	4336794.59	4565046.93	0	0	0	0

NetElecCO2	NetGasCO2	GrossElecCO2	GrossGasCO2	NetElecCO2Lifecycle	NetGasCO2Lifecycle	GrossElecCO2Lifecycle
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-	35.1198272	-	36.9682392	-	456.557754	-
105.66153	72.2934455	111.222666	76.0983637	776.298389	506.05411	817.156199
388.838523	-	409.303709	-	4366.91700	-	4596.75473
-	128.772	-	135.550210	-	1674.04509	-
375.578721	256.970338	395.346023	270.49509	2759.38791	1798.79236	2904.61885
1382.8412	-	1455.62234	-	15530.23	-	16347.6136

GrossGasCO2Lifecycle	NetElecNOx	NetGasNOx	GrossElecNOx	GrossGasNOx	NetElecNOxLifecycle	NetGasNOxLifecycle
480.587109	-	0	-	0	-	0
532.688546	57.7278046	0	60.7661101	0	404.094632	0
-	219.158305	0	230.692953	0	2191.58305	0
1762.15273	-	0	-	0	-	0
1893.46565	205.196105	0	215.995900	0	1436.37273	0
-	779.401016	0	820.422122	0	7794.01016	0

GrossElecNOxLifecycle	GrossGasNOxLifecycle	NetPM10	GrossPM10	NetPM10Lifecycle	GrossPM10Lifecycle	IncentiveToOthers
-	0	-	-	-	-	0
425.36277	0	24.3662833	25.6487193	170.563983	179.541035	0
2306.92953	0	92.2693086	97.125588	922.693086	971.25588	0
-	0	-	-	-	-	0
1511.97130	0	86.6110617	91.1695386	606.277432	638.186770	0
8204.22122	0	328.140851	345.411422	3281.40851	3454.11422	0

DILaborCost	DIMaterialCost	EndUserRebate	RebatesandIncents	GrossMeasureCost	ExcessIncentives	MarkEffectPlusExcessInc
0	0	37417.2461	37417.2461	64671.7835	0	0
0	0	258471.561	258471.561	459354.439	0	0
0	0	333663.288	333663.288	592984.821	0	0
0	0	137196.569	137196.569	237129.872	0	0
0	0	918748.913	918748.913	1632796.23	0	0
0	0	1186619.44	1186619.44	2108854.47	0	0

GrossParticipantCost	GrossParticipantCostAdjusted	NetParticipantCost	NetParticipantCostAdjusted	RebatesandIncentsPV
27254.5373	27254.5373	25891.8104	25891.8104	36024.2947
200882.87	200882.87	190838.734	190838.734	248849.305
259321.533	259321.533	246355.456	246355.456	321241.830
99933.3035	99933.3035	94936.6383	94936.6383	132089.080
714047.320	714047.320	678344.954	678344.954	884546.167
922235.031	922235.031	876123.279	876123.279	1142444.53

GrossMeasCostPV	ExcessIncentivesPV	MarkEffectPlusExcessIncPV	GrossParticipantCostPV	GrossParticipantCostAdjustedPV
62264.2131	0	0	26239.9184	26239.9184
442253.811	0	0	193404.505	193404.505
570909.465	0	0	249667.63	249667.63
228302.11	0	0	96213.0341	96213.0341
1572011.27	0	0	687465.107	687465.107
2030347.04	0	0	887902.50	887902.50

NetParticipantCostPV	NetParticipantCostAdjustedPV	WtdAdminCostsOverheadAndGA	WtdAdminCostsOther
24927.9224	24927.9224	4004.8091	0
183734.280	183734.280	18898.8851	0
237184.253	237184.253	71158.4144	0
91402.3824	91402.3824	14684.3001	0
653091.852	653091.852	67596.0139	0
843507.379	843507.379	254475.577	0

WtdMarketingOutreach	WtdDIActivity	WtdDIInstallation	WtdDIHardwareAndMaterials	WtdDIRebateAndInspection	WtdEMV
2402.88733	8009.60894	0	0	0	1668.66581
11339.3398	37797.7264	0	0	0	7874.51354
42695.0816	142316.663	0	0	0	29649.2567
8810.58688	29368.5661	0	0	0	6118.44133
40557.6397	135191.87	0	0	0	28164.9273
152685.464	508950.563	0	0	0	106031.195

WtdUserInputIncentive	WtdCostsRecoveredFromOtherSources	ProgramCosts	TotalExpenditures	DiscountedSavingsGrosskWh
-	0	15018.0200	52435.2662	-
-	0	70870.7526	329342.31	2345978.89
-	0	266843.802	600507.091	11176819.7
-	0	55066.0735	192262.642	-
-	0	253484.813	1172233.72	8338888.62
-	0	954282.516	2140901.95	39748548.9

DiscountedSavingsNetkWh	DiscountedSavingsGrossThm	DiscountedSavingsNetThm	TRLifecycleNetBen	PACLifecycleNetBen
-	52753.1907	50115.5312	-	-
2228679.95	71023.0129	67471.8622	-	34792.0905
10617978.7	-	-	386736.384	623920.637
-	193428.366	183756.947	-	-
7921944.1	252454.527	239831.801	-	129959.587
37761121.5	-	-	1396560.15	2240067.53

LevBenElec	LevBenGas	LevTRCCost	LevTRCCostNoAdmin	LevPACCost	LevPACCostNoAdmin	LevRIMCost	LevNetBenTRCElec
0.13713856	1.49900961	0	0	0	0	0	0.13713856
0.11829463	1.34680252	0.16799408	0.14434573	0.10668510	0.08303675	0.25306496	-
0.12571275	1.42358020	0.07772382	0.05259250	0.05538583	0.03025451	0.25880653	0.04798893
0.13818541	1.49900961	0	0	0	0	0	0.13818541
0.11928694	1.34680252	0.1685009	0.1446541	0.10706091	0.08321418	0.2537535	-
0.12641428	1.42358020	0.07786406	0.05259250	0.0555260	0.03025451	0.25894677	0.04855022

LevNetBenTRCElecNoAdmin	LevNetBenPACElec	LevNetBenPACElecNoAdmin	LevNetBenTRCGas	LevNetBenTRCGasNoAdmin
0.13713856	0.13713856	0.13713856	-	0.28277553
-	0.01160952	0.03525788	-	-
0.07312025	0.0703269	0.09545823	1.42358020	1.42358020
0.13818541	0.13818541	0.13818541	-	0.28277553
-	0.01222602	0.03607275	-	-
0.07382178	0.07088820	0.09615976	1.42358020	1.42358020

LevNetBenPACGas	LevNetBenPACGasNoAdmin	LevNetBenRIMElec	LevNetBenRIMGas
0.48051667	0.78018465	0.13713856	1.58442503
0.13217621	0.40141638	-	-
1.42358020	1.42358020	-	1.42358020
0.48051667	0.78018465	0.13818541	1.58442503
0.13803722	0.40727738	-	-
1.42358020	1.42358020	-	1.42358020

CEInputID	PrgID	ClaimYearQuarter	Sector	DeliveryType	BldgType	E3ClimateZone	E3GasSavProfile	E3GasSector
1	EBCE-COM-001	2024Q3	Com	DnCust	Com	3A	Annual	Commercial
2	EBCE-COM-001	2024Q3	Com	DnCust	Com	3A	Annual	Commercial
3	EBCE-COM-001	2024Q3	Com	DnCust	Com	3A	Annual	Commercial
4	EBCE-COM-001	2024Q3	Com	DnCust	Com	12	Annual	Commercial
5	EBCE-COM-001	2024Q3	Com	DnCust	Com	12	Annual	Commercial
6	EBCE-COM-001	2024Q3	Com	DnCust	Com	12	Annual	Commercial

E3MeaElecEndUseShape	E3TargetSector	MeasAppType	MeasCode	MeasDescription	MeasImpactType	MeasureID
DEER:Indoor_Non-CFL_Ltg	Non_Res	NR	MBCAP	DEER:Indoor_Non-CFL_Ltg	Cust-NMEC	
DEER:HVAC_Chillers	Non_Res	NR	MBCAP	DEER:HVAC_Chillers	Cust-NMEC	
DEER:HVAC_Split-Package_HP	Non_Res	NR	MBCAP	DEER:HVAC_Split-Package_HP	Cust-NMEC	
DEER:Indoor_Non-CFL_Ltg	Non_Res	NR	MBCAP	DEER:Indoor_Non-CFL_Ltg	Cust-NMEC	
DEER:HVAC_Chillers	Non_Res	NR	MBCAP	DEER:HVAC_Chillers	Cust-NMEC	
DEER:HVAC_Split-Package_HP	Non_Res	NR	MBCAP	DEER:HVAC_Split-Package_HP	Cust-NMEC	

TechGroup	TechType	UseCategory	UseSubCategory	PreDesc	StdDesc	SourceDesc	Version	NormUnit	NumUnits
Ltg_Lamp	LED_lamp	Lighting	InGen					Each	1947.89201
HV_Tech	RoomAC	HVAC	HeatCool					Each	1508.16985
HV_Tech	HP_EF	HVAC	HeatCool					Each	254.575986
Ltg_Lamp	LED_lamp	Lighting	InGen					Each	547.724091
HV_Tech	RoomAC	HVAC	HeatCool					Each	424.293310
HV_Tech	HP_EF	HVAC	HeatCool					Each	69.4298144

UnitkW1stBaseline	UnitkWh1stBaseline	UnitTherm1stBaseline	UnitkW2ndBaseline	UnitkWh2ndBaseline	UnitTherm2ndBaseline
0.50032390	4382.83737	-	0	0	0
0.17537468	1536.28224	46.5099638	0	0	0
-	-	138.076455	0	0	0
0.50032390	4382.83737	-	0	0	0
0.17537468	1536.28224	46.5099638	0	0	0
-	-	138.076455	0	0	0

UnitMeaCost1stBaseline	UnitMeaCost2ndBaseline	UnitDirectInstallLab	UnitDirectInstallMat	UnitEndUserRebate
203	0	0	0	610.
203	0	0	0	610.
175	0	0	0	52
203	0	0	0	610.
203	0	0	0	610.
175	0	0	0	52

UnitIncentiveToOthers	NTG_ID	NTGRkW	NTGRkWh	NTGRTherm	NTGRCost	EUL_ID	EUL_Yrs	RUL_ID
0	NonRes-sAll-mCust-Elec	0.9	0.95	0.9	0.95	Nonres-RCx-Operational	10	
0	NonRes-sAll-mCust-Elec	0.9	0.95	0.9	0.95	Nonres-RCx-Operational	7	
0	NonRes-sAll-mCust-Elec	0.9	0.95	0.9	0.95	Nonres-RCx-Operational	13	
0	NonRes-sAll-mCust-Elec	0.9	0.95	0.9	0.95	Nonres-RCx-Operational	10	
0	NonRes-sAll-mCust-Elec	0.9	0.95	0.9	0.95	Nonres-RCx-Operational	7	
0	NonRes-sAll-mCust-Elec	0.9	0.95	0.9	0.95	Nonres-RCx-Operational	13	

InstallationRateTherm	Residential_Flag	Upstream_Flag	PA	UnitGasInfraBens	UnitRefrigCosts	UnitRefrigBens	UnitMiscCosts
1	0	0	PGE	0	0	0	0
1	0	0	PGE	0	0	0	0
1	0	0	PGE	0	0	0	0
1	0	0	PGE	0	0	0	0
1	0	0	PGE	0	0	0	0
1	0	0	PGE	0	0	0	0

RUL_Yrs	GSIA_ID	RealizationRatekW	RealizationRatekWh	RealizationRateTherm	InstallationRatekW	InstallationRatekWh
0		0.9	0.9	0.9	1	1
0		0.9	0.9	0.9	1	1
0		0.9	0.9	0.9	1	1
0		0.9	0.9	0.9	1	1
0		0.9	0.9	0.9	1	1
0		0.9	0.9	0.9	1	1

MiscCostsDesc	UnitMiscBens	MiscBensDesc	RateScheduleElec	RateScheduleGas	CombustionType	MeasInflation	Comments
0	0					0	
0	0					0	
0	0					0	
0	0					0	
0	0					0	
0	0					0	

PrgID	PrgYear	ClaimYearQuarter	AdminCostsOverheadAndGA	AdminCostsOther	MarketingOutreach	DIActivity
EBCE-COM-001	202	2024Q3	43081	0	25849	86163

DIInstallation	DIHardwareAndMaterials	DIRebateAndInspection	EMV	UserInputIncentive	OnBillFinancing
0	0	0	17950	0	0

CostsRecoveredFromOtherSources	PA
0	PGE

JobID	PA	PrgID	CET_ID	GrossKWh	GrossKW	GrossThm	NetKWh	NetKW	NetThm
6119	PGE	EBCE-COM-001	6	-	-	8627.96039	-	-	8196.56237
6119	PGE	EBCE-COM-001	5	586650.85	66.9692750	17760.4798	557318.308	63.6208113	16872.4558
6119	PGE	EBCE-COM-001	4	2160527.05	246.635509	-	2052500.70	234.303733	-
6119	PGE	EBCE-COM-001	3	-	-	31635.8547	-	-	30054.0620
6119	PGE	EBCE-COM-001	2	2085277.11	238.045332	63130.4330	1981013.26	226.143065	59973.9113
6119	PGE	EBCE-COM-001	1	7683564.54	877.119241	-	7299386.31	833.263279	-

LifecycleGrossKWh	LifecycleGrossThm	LifecycleNetKWh	LifecycleNetThm	GoalAttainmentKWh	GoalAttainmentKW
-	112163.485	-	106555.310	-	-
4106555.95	124323.359	3901228.15	118107.191	586650.85	66.9692750
21605270.5	-	20525007.0	-	2160527.05	246.635509
-	411266.112	-	390702.806	-	-
14596939.8	441913.031	13867092.8	419817.379	2085277.11	238.045332
76835645.4	-	72993863.1	-	7683564.54	877.119241

GoalAttainmentThm	FirstYearGrossKWh	FirstYearGrossKW	FirstYearGrossThm	FirstYearNetKWh	FirstYearNetKW	FirstYearNetThm
8627.96039	-	-	8627.96039	-	-	8196.56237
17760.4798	586650.85	66.9692750	17760.4798	557318.308	63.6208113	16872.4558
-	2160527.05	246.635509	-	2052500.70	234.303733	-
31635.8547	-	-	31635.8547	-	-	30054.0620
63130.4330	2085277.11	238.045332	63130.4330	1981013.26	226.143065	59973.9113
-	7683564.54	877.119241	-	7299386.31	833.263279	-

WeightedSavings	ElecBen	GasBen	ElecBenGross	GasBenGross	TRCCost	PACCost	TRCCostGross	TRCCostNoAdmin
0.01573816	-	81695.7265	-	85995.5016	134899.192	57108.1909	138993.456	112884.686
0.06891011	193072.455	97550.3310	203234.164	102684.55	880117.779	327579.406	909198.746	801803.804
0.13447223	919489.335	-	967883.511	-	1282830.14	569553.335	1320371.0	1035055.82
0.05770660	-	299550.997	-	315316.839	494630.373	209396.700	509642.672	413910.518
0.24494414	696285.555	346747.086	732932.163	364996.932	3131113.54	1167090.78	3234483.16	2850048.0
0.4782287	3360966.24	-	3537859.20	-	4586686.24	2050032.80	4720194.3	3681008.37

PACCostNoAdmin	TRCRatio	PACRatio	TRCRatioNoAdmin	PACRatioNoAdmin	BillReducElec	BillReducGas	RIMCost
35093.6850	0.42333091	0.9999791	0.50588791	1.627272	-	0	-
249265.431	0.33020897	0.88718271	0.36246122	1.16591693	598939.076	0	926518.483
321779.011	0.61305723	1.38081589	0.75981244	2.44406337	2948982.76	0	3518536.09
128676.845	0.41958496	0.99113055	0.50141143	1.61287344	-	0	-
886025.306	0.33311875	0.89370309	0.36597019	1.1772041	2128956.17	0	3296046.95
1144354.93	0.62961083	1.40867372	0.7845207	2.52354164	10487579.5	0	12537612.3

WeightedBenefits	WeightedElecAlloc	WeightedProgramCost	ElecSupplyCost	GasSupplyCost	ElecSupplyCostGross
0.01362649	0	22014.505	0	0	0
0.04847463	0.66434039	78313.9746	0	0	0
0.15336688	1	247774.323	0	0	0
0.04996382	0	80719.8549	0	0	0
0.17397337	0.66755873	281065.475	0	0	0
0.56059477	1	905677.86	0	0	0

GasSupplyCostGross	TotalSystemBenefit	TotalSystemBenefitGross	OtherBen	OtherCost	OtherBenGross	OtherCostGross
0	57106.9991	60112.6306	0	0	0	0
0	290622.78	305918.723	0	0	0	0
0	786448.298	827840.31	0	0	0	0
0	207539.46	218462.596	0	0	0	0
0	1043032.64	1097929.09	0	0	0	0
0	2887827.34	3039818.25	0	0	0	0

NetElecCO2	NetGasCO2	GrossElecCO2	GrossGasCO2	NetElecCO2Lifecycle	NetGasCO2Lifecycle	GrossElecCO2Lifecycle
-	47.949889	-	50.4735683	-	623.348568	-
69.7634889	98.7038669	73.4352515	103.898807	512.76329	690.927068	539.750833
284.859984	-	299.852615	-	3292.91921	-	3466.23075
-	175.81626	-	185.069750	-	2285.61141	-
247.977492	350.847381	261.028939	369.313033	1822.6404	2455.93167	1918.56887
1013.05839	-	1066.37725	-	11710.7338	-	12327.0882

GrossGasCO2Lifecycle	NetElecNOx	NetGasNOx	GrossElecNOx	GrossGasNOx	NetElecNOxLifecycle	NetGasNOxLifecycle
656.156388	-	0	-	0	-	0
727.29165	78.8170698	0	82.9653366	0	551.719488	0
-	299.221762	0	314.970276	0	2992.21762	0
2405.90675	-	0	-	0	-	0
2585.19123	280.158857	0	294.904060	0	1961.11200	0
-	1064.13373	0	1120.14077	0	10641.3373	0

GrossElecNOxLifecycle	GrossGasNOxLifecycle	NetPM10	GrossPM10	NetPM10Lifecycle	GrossPM10Lifecycle	IncentiveToOthers
-	0	-	-	-	-	0
580.757356	0	33.2678345	35.0187732	232.874842	245.131412	0
3149.70276	0	125.977362	132.607749	1259.77362	1326.07749	0
-	0	-	-	-	-	0
2064.32842	0	118.252030	124.475821	827.764211	871.330749	0
11201.4077	0	448.018083	471.597982	4480.18083	4715.97982	0

DILaborCost	DIMaterialCost	EndUserRebate	RebatesandIncents	GrossMeasureCost	ExcessIncentives	MarkEffectPlusExcessInc
0	0	36450.6525	36450.6525	121502.175	0	0
0	0	258903.777	258903.777	863012.593	0	0
0	0	334221.240	334221.240	1114070.80	0	0
0	0	133652.392	133652.392	445507.97	0	0
0	0	920285.247	920285.247	3067617.49	0	0
0	0	1188603.70	1188603.70	3962012.36	0	0

GrossParticipantCost	GrossParticipantCostAdjusted	NetParticipantCost	NetParticipantCostAdjusted	RebatesandIncentsPV
85051.5226	85051.5226	80798.9465	80798.9465	35093.6850
604108.815	604108.815	573903.374	573903.374	249265.431
779849.561	779849.561	740857.083	740857.083	321779.011
311855.583	311855.583	296262.804	296262.804	128676.845
2147332.24	2147332.24	2039965.63	2039965.63	886025.306
2773408.65	2773408.65	2634738.22	2634738.22	1144354.93

GrossMeasCostPV	ExcessIncentivesPV	MarkEffectPlusExcessIncPV	GrossParticipantCostPV	GrossParticipantCostAdjustedPV
116978.950	0	0	81885.2651	81885.2651
830884.771	0	0	581619.340	581619.340
1072596.70	0	0	750817.69	750817.69
428922.817	0	0	300245.972	300245.972
2953417.68	0	0	2067392.38	2067392.38
3814516.45	0	0	2670161.51	2670161.51

NetParticipantCostPV	NetParticipantCostAdjustedPV	WtdAdminCostsOverheadAndGA	WtdAdminCostsOther
77791.0018	77791.0018	5870.54035	0
552538.373	552538.373	20883.7459	0
713276.809	713276.809	66073.2143	0
285233.673	285233.673	21525.3146	0
1964022.76	1964022.76	74950.8630	0
2536653.44	2536653.44	241514.321	0

WtdMarketingOutreach	WtdDIActivity	WtdDIInstallation	WtdDIHardwareAndMaterials	WtdDIRebateAndInspection	WtdEMV
3522.3269	11741.0670	0	0	0	2446.05166
12530.2572	41767.4434	0	0	0	8701.53658
39643.959	132146.275	0	0	0	27530.4293
12915.1987	43050.5793	0	0	0	8968.85612
44970.5526	149901.552	0	0	0	31229.439
144908.705	483028.082	0	0	0	100630.68

WtdUserInputIncentive	WtdCostsRecoveredFromOtherSources	ProgramCosts	TotalExpenditures	DiscountedSavingsGrosskWh
-	0	22014.505	58465.1584	-
-	0	78313.9746	337217.752	3203017.74
-	0	247774.323	581995.564	15259963.2
-	0	80719.8549	214372.247	-
-	0	281065.475	1201350.72	11385272.1
-	0	905677.86	2094281.57	54269587.7

DiscountedSavingsNetkWh	DiscountedSavingsGrossThm	DiscountedSavingsNetThm	TRCLifecycleNetBen	PACLifecycleNetBen
-	72025.1176	68423.8617	-	-
3042866.85	96969.3166	92120.8508	-	-
14496965.1	-	-	-	216894.962
-	264092.098	250887.493	-	-
10816008.5	344681.843	327447.751	-	-
51556108.3	-	-	-	837794.540

LevBenElec	LevBenGas	LevTRCCost	LevTRCCostNoAdmin	LevPACCost	LevPACCostNoAdmin	LevRIMCost	LevNetBenTRCElec
0.06827820	1.19396544	0	0	0	0	0	0.06827820
0.06345083	1.05893866	0.1921535	0.17505552	0.07151947	0.05442140	0.20228412	-
0.06342633	1.12954042	0.08848956	0.07139810	0.03928776	0.02219630	0.24270846	-
0.06968139	1.19396544	0	0	0	0	0	0.06968139
0.06437546	1.05893866	0.19325079	0.17590356	0.0720322	0.05468504	0.20343040	-
0.06519045	1.12954042	0.08896494	0.07139810	0.03976314	0.02219630	0.24318383	-

LevNetBenTRCElecNoAdmin	LevNetBenPACElec	LevNetBenPACElecNoAdmin	LevNetBenTRCGas	LevNetBenTRCGasNoAdmin
0.06827820	0.06827820	0.06827820	-	-
-	-	0.00902943	-	-
-	0.0241385	0.04123003	1.12954042	1.12954042
0.06968139	0.06968139	0.06968139	-	-
-	-	0.00969041	-	-
-	0.02542731	0.04299415	1.12954042	1.12954042

LevNetBenPACGas	LevNetBenPACGasNoAdmin	LevNetBenRIMElec	LevNetBenRIMGas
0.35934153	0.68107879	0.06827820	1.463249
-	0.15069328	-	-
1.12954042	1.12954042	-	1.12954042
0.35934153	0.68107879	0.06968139	1.463249
-	0.15940166	-	-
1.12954042	1.12954042	-	1.12954042

Appendix B: Funding Analysis (Clean)

The table below presents 2022 forecasted EBCE load, non-bypassable surcharge per kWh, and total dollars collected through the surcharge. To calculate energy efficiency non-bypassable charge collections from EBCE’s customers in 2022, EBCE used fee per kWh data and load data from PG&E’s Electric Rate Schedules.

Table 1: EBCE Electric kWh by Rate Class (2022 Forecast)

Rate Class	Current Public Purpose Programs Charge (PPPC) (\$/kWh)	Load Forecast Annual kWh	PPPC \$
E-1	\$0.02024	942,533,447.90	\$19,076,876.99
E-TOU	\$0.02024	1,829,401,251.01	\$37,027,081.32
TC	\$0.00878	8,699,006.34	\$76,377.28
A-1	\$0.02103	949,936,146.94	\$19,977,157.17
A-6	\$0.01897	170,049,624.75	\$3,225,841.38
A-10	\$0.01834	1,063,773,899.87	\$19,509,613.32
AG	\$0.01717	42,330,609.90	\$726,816.57
E-19S	\$0.01834	1,209,853,266.56	\$22,188,708.91
E-19P	\$0.01739	86,734,308.00	\$1,508,309.62
E-19T	\$0.01739	4,886,897.91	\$84,983.15
E-20S	\$0.01790	181,095,354.34	\$3,241,606.84
E-20P	\$0.01688	303,673,364.84	\$5,126,006.40
E-20T	\$0.01524	49,419,191.80	\$753,148.48
SL	\$0.00866	78,455,721.16	\$679,426.55
Annual PPPC Total		6,920,842,091.31	\$ 133,201,953.98
Max Funding Available (Annual)			\$ 4,487,682.84

PG&E 2021 Programs proposed for inclusion or to be determined for EBCE’s ETA Funding Determination are listed in the following table. Included programs are based on PG&E 2021 filed Annual Budget Advice Letter and programs listed on CEDARS as of March 2021 as well as consultation with PG&E.

Table 2: PG&E Programs for EBCE ETA Funding Determination

CCA Funding Category	Status: Statewide; Regional; Other	Program Sector	Program ID	Program Name	2021 Budget (\$)
Included	Other	Public	PGE2110051	Local Government Energy Action Resources (LGEAR)	3,041,724.05
Included	Other	Public	PGE_Pub_001	Central Coast Leaders in Energy Action Program	346,843.89
Included	Other	Public	PGE_Pub_002	Marin Energy Watch Partnership	278,310.80
Included	Other	Public	PGE_Pub_003	Redwood Coast Energy Watch	375,390.21

CCA Funding Category	Status: Statewide; Regional; Other	Program	Program ID	Program Name	2021 Budget (\$)
Included	Other	Public	PGE_Pub_004	Central California Energy Watch	801,965.02
Included	Other	Public	PGE_Pub_005	San Mateo County Energy Watch Program	449,256.94
Included	Other	Public	PGE_Pub_006	Energy Access SF	1,006,036.74
Included	Other	Public	PGE_Pub_007	Sierra Nevada Energy Watch	747,981.10
Included	Other	Public	PGE_Pub_008	Sonoma Public Energy	397,071.73

EBCE determined that 3.37% of PG&E’s portfolio was tied to local programs. The noted 3.37% is associated with Government Partnership programs filed for in 2021. PG&E’s 2021 Annual Budget Advice Letter shows that Government Partnerships are forecasted as 3.37% of the total budget. Based on this determination, EBCE’s first-year not to exceed value is 3.37% of the total non-bypassable funds collected from EBCE customers for EE programs in 2021.

Table 3: 2021 PG&E ABAL Filing Budget

Primary Sector	State and Regional (S & R) / Local	2021 Filing Budget	% Of portfolio
Agricultural	<u>S & R</u>	<u>\$13,864,905.15</u>	6%
Commercial	<u>S & R</u>	<u>\$54,752,092.29</u>	25%
Cross-Cutting	<u>S & R</u>	<u>\$54,573,405.18</u>	25%
Industrial	<u>S & R</u>	<u>\$31,732,548.39</u>	14%
Institutional Partnerships	<u>S & R</u>	<u>\$4,758,824.77</u>	2%
Government Partnerships	<u>Local</u>	<u>\$7,444,580.48</u>	3%
Residential	<u>S & R</u>	<u>\$49,979,411.49</u>	23%
Other	<u>S & R</u>	<u>\$3,861,867.73</u>	2%
Total		<u>\$220,967,635.48</u>	100%

EBCE has determined that our annual not to exceed dollar value for local programming is \$4,487,682.84. See the table below where Annual PPC \$ Included equals EBCE load multiplied by the surcharge per kWh across rates less statewide and regional programming.

Table 4: Available Non-Bypassable Funding less S&R

Available Non-Bypassable Funding less S&R	
Total Dollar Value	\$133,201,953.98
Less S&R	\$ 128,714,271.14
Annual Dollars Available to EBCE	\$4,487,682.84