



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person:

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

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type:  Monthly    Quarterly    Annual    One-Time    Other:

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

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested?  Yes    No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes    No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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

Tariff schedules affected:

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

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

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

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

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

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

## ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

August 16, 2021

California Public Utilities Commission  
Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, California 94102-3298  
Email: EDTariffUnit@cpuc.ca.gov

RE: **CleanPowerSF Advice Letter 17-E Election to Administer Energy Efficiency Program**  
**(Public Version)**

## **PURPOSE**

CleanPowerSF, a program of the San Francisco Public Utilities Commission (SFPUC), submits this Tier 3 Advice Letter to request California Public Utilities Commission (“Commission”) certification to administer an energy efficiency program serving micro, small, medium, and large businesses pursuant to Public Utilities Code sections 381.1 (e) and (f).<sup>1</sup> Commission Decision (D.) 14-01-033, Decision Enabling Community Choice Aggregators to Administer Energy Efficiency Programs (“Decision”) established the rules and funding formula for community choice aggregators (CCAs) to file advice letters to administer energy efficiency programs for their own customers.

## **BACKGROUND**

CleanPowerSF is a Community Choice Aggregator (CCA) formed by the City and County of San Francisco (“San Francisco” or “City”). SFPUC is San Francisco’s primary electricity provider, operating two distinct electricity services: CleanPowerSF, and Hetch Hetchy Power, a publicly owned utility.

With service to customers beginning in 2016, CleanPowerSF, an award-winning CCA,<sup>2</sup> currently serves approximately 380,000 residential and business accounts with clean energy at competitive rates. CleanPowerSF offers

<sup>1</sup> All subsequent references to code sections are to the Public Utilities Code.

<sup>2</sup> In 2019, C40 Cities awarded CleanPowerSF its C40 Cities Bloomberg Philanthropies Award, a prestigious honor that provides international recognition for cities that are demonstrating climate action leadership. San Francisco was one of only seven winners from across the globe. <<https://www.c40.org/awards/awards-2019/profiles>> [As of August 6, 2021]

CleanPowerSF is a program of the San Francisco Public Utilities Commission (SFPUC), an enterprise department of the City and County of San Francisco.

CleanPowerSF is committed to protecting customer privacy. Learn more at [cleanpowersf.org/privacy](https://cleanpowersf.org/privacy).

**OUR MISSION:** To provide our customers with high-quality, efficient and reliable water, power and sewer services in a manner that values environmental and community interests and sustains the resources entrusted to our care.

**London N. Breed**  
Mayor

**Sophie Maxwell**  
President

**Anson Moran**  
Vice President

**Tim Paulson**  
Commissioner

**Ed Harrington**  
Commissioner

**Newsha Ajami**  
Commissioner

**Michael Carlin**  
Acting  
General Manager



electricity that is sourced from at least 48% Renewable Portfolio Standard (RPS) eligible Renewable Resources as well as the option to receive 100% RPS-eligible Renewable energy for a small additional fee.<sup>3</sup> For over 100 years, Hetch Hetchy Power has been generating greenhouse gas (GHG) emissions-free hydropower to serve San Francisco, powering municipal operations as well as a growing number of select businesses, residents, and wholesale customers. Together, the SFPUC clean power programs serve more than 70% of the electricity consumed in San Francisco.<sup>4</sup> These programs will eliminate GHG emissions from the electricity supply they provide to San Francisco by 2030 in accordance with City goals.<sup>5</sup>

CleanPowerSF has partnered with the San Francisco Department of the Environment (SFE) to develop this program. Created by voter mandate in 1996, SFE serves the City's 900,000 residents by creating visionary policies and innovative programs to improve, enhance, and preserve the City's urban and natural environment. SFE is responsible for tracking and meeting the City's GHG reduction goals, designing and implementing its advanced energy and green building policies, launching innovative financing solutions, and advancing the use of distributed energy resources including solar, storage, and clean transportation through programs, projects, and outreach. SFE has demonstrated experience in developing and implementing innovative energy efficiency programs. Since 2006, SFE has implemented the local government partnership (LGP) with PG&E. Also, SFE has implemented residential and commercial rebate programs with the Bay Area Regional Energy Network (BayREN).

Together, SFPUC and SFE have decades of experience engaging stakeholders from both the public and private sectors. Of note, both agencies were the first of their kind to launch Environmental Justice initiatives. SFPUC's Environmental Justice Policy, adopted in 2009, and SFE's Environmental Justice Program, launched in 2000, are dedicated to providing programming and working with community-based organizations in San Francisco's most vulnerable neighborhoods.

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<sup>3</sup>2019 CleanPowerSF Power Content Label Available at <https://static1.squarespace.com/static/5a79fded4c326db242490272/t/5fd141e25a35a86a4754ab06/1607549420113/CleanPowerSF+2019+Green+PCL.pdf> [as of August 6, 2021]

<sup>4</sup> San Francisco Public Utilities Commission Comprehensive Annual Financial Report 2019-2020, p.5 Available at <https://sfpuc.org/sites/default/files/about-us/policies-reports/Comprehensive%20Annual%20Financial%20Report%20FY2020%20SFPUC.pdf> [as of August 6, 2021]

<sup>5</sup> Board of Supervisors Ordinance 81-08; Available at <https://www.sfbos.org/ftp/uploadedfiles/bdsupvrs/ordinances08/o0081-08.pdf> [as of August 6, 2021]

The City is internationally recognized as a pioneer on sustainability and climate change. The City has continuously reduced its annual GHG emissions by enforcing new green building standards, investing in renewable energy systems, pursuing rigorous energy efficiency improvements, and procuring renewable energy. The City has also built a strong policy foundation to reach net-zero emissions for its buildings by 2050.<sup>6</sup>

## **SUMMARY OF PROPOSAL**

This proposal presents the CleanPowerSF Community Food Service Energy Efficiency Program (“the Program”). This is a resource acquisition program with the purpose to expand access to energy efficiency services and rebates to the City’s food service sector, including non-profit social service organizations. The Program aims to strengthen the economic viability and increase the service capacity of food service businesses and organizations by facilitating energy efficiency investments that reduce energy usage and utility costs. The resulting energy savings will contribute to achieving the City’s and State’s emissions reduction and energy efficiency goals.

The Program will meet the cost-effectiveness requirement by leveraging the BayREN Business program model to reduce the time, money and effort needed to ramp up the program. Additionally, the Program will work collaboratively with BayREN’s existing energy efficiency offerings. While BayREN continues to serve small and medium businesses (SMB), the Program will focus specifically on food service businesses and non-profit social service organizations. The Program will not “reinvent the wheel.” Rather, it will mimic the BayREN Business program approach, design, and data infrastructure.

The BayREN Business program represents a significant ratepayer investment. So, by modeling key program elements after BayREN’s existing program design, where possible, the Program will shorten the “ramp-up” phase, allowing more time for project recruitment and installations. CleanPowerSF is keenly aware of the need to keep the two programs separate and to avoid potential market confusion. Each program will be exclusive, with its own customer sector and accounting and energy savings ledgers.

The three-year Program budget is \$4,579,056 for administration, marketing and outreach, direct implementation non-incentive, and direct implementation-incentive.

## **AUTHORITY FOR CCA ELECT TO ADMINISTER PROGRAMS**

Assembly Bill (AB) 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 the administration of energy efficiency programs on the same terms as the investor owned utilities (IOUs).

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<sup>6</sup> Mayor London Breed Announces Significant Efforts to Reduce Greenhouse Gas Emissions in San Francisco. Available at <<https://sfenvironment.org/press-release/mayor-london-breed-announces-significant-efforts-to-reduce-greenhouse-gas-emissions-in-san-francisco>> [as of August 6, 2021]

SB 790 modified Public Utilities Code Section 381.1 to provide CCAs with another option for energy efficiency program administration by adding subsections (e) and (f) to Sections 381.1. The additional subsections allow a CCA to invoke an alternative Commission review process (as opposed to a formal application) for programs offered 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 Section 381.1 (e)-(f). This second option allows a CCA, such as CleanPowerSF, to “elect” to become a program administrator for cost-effective energy efficiency and conservation programs, subject to Commission certification of a plan. CleanPowerSF pursues this option through the filing of this Advice Letter.

In D.14-01-033, the Commission lists and explains the rules for evaluating a CCA’s plan for certification. Broadly, 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 ratepayer 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).<sup>7</sup> These requirements are addressed below and detailed in Attachment 1, CleanPowerSF’s Energy Efficiency Program Plan (“Plan”).

### **FUNDING DETERMINATION**

To make the funding determination, 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.”<sup>8</sup> In coordination with CleanPowerSF and Pacific Gas & Electric Company (“PG&E”), Energy Division 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.”<sup>9</sup> To determine the maximum amount of permissible program funding, CleanPowerSF used the following required 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 percent (%) of the applicable IOU portfolio budget that was dedicated to statewide and regional programs in the most recently authorized program cycle).<sup>10</sup>

Based on this, CleanPowerSF is requesting \$4,579,056 for the three-year program budget which is within the CCA Maximum Funding as included in Appendix B.<sup>11</sup>

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<sup>7</sup> D.14-01-033, pp.22-30.

<sup>8</sup> D.14-01-033, p.22.

<sup>9</sup> D.14-01-033, p.23.

<sup>10</sup> D.14-01-033, p.22.

<sup>11</sup> See Attachment 1, Appendix B, CleanPowerSF CCA Maximum Funding. Pursuant to Declaration of Michael A. Hyams Seeking Confidential Treatment of Certain Data and Information Contained in CleanPowerSF Advice Letter 17-E Election to Administer Energy Efficiency Program, certain portions of Appendix B are confidential. The confidential information in Appendix B is redacted in the Public Version of this advice letter.

## **SECTION 381.1 (f) REQUIREMENTS**

The Commission must certify that a CCA plan meets all six criteria of section 381.1(f), as specified in paragraphs (1)-(6).<sup>12</sup>

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 Section 381.1 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 CCA.
6. Includes performance metrics regarding the CCA's achievement of the objectives listed in paragraphs (1) to (5), inclusive, and in any previous plan.<sup>13</sup>

### *Consistency with Commission Requirements*

The Program will deliver cost-effective energy savings to customers of CleanPowerSF along with benefits such as utility cost reduction and a safe and reliable electric grid. These outcomes support the movement toward zero net energy as envisioned in the California Energy Efficiency Strategic Plan.<sup>14</sup>

### *Cost Effectiveness*

The Commission determined that the energy efficiency portfolios of CCAs are subject to the cost-effectiveness threshold, Total Resource Cost ("TRC") ratio of 1.0 for the first three program years.<sup>15</sup> CleanPowerSF performed a cost-effectiveness analysis of the proposed program in accordance with the methodologies included in the "California Standard Practices Manual" using deemed values and a modified custom lighting calculator previously used in PG&E territory due to the direct territorial relationship between PG&E's existing program and this proposed CleanPowerSF program. To compare the analysis with real-world intelligence and data, CleanPowerSF combined the latest sector-level energy consumption data with recent market analysis. As a result, the Program projects an achievable energy savings target, depth of

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<sup>12</sup> D.14-01-033, p. 27.

<sup>13</sup> Public Utilities Code section 381.1(f).

<sup>14</sup> The Energy Efficiency Program Plan ("Plan"), Attachment 1, explains how it is consistent with the goals of the programs established pursuant to Section 381.1 and Section 399.4 in the "Consistency with Commission Requirements" section. (pp. 19-20).

<sup>15</sup> D.14-01-033, p. 14.



intervention, and overall program savings goal. As detailed in the attached Plan, the Program projects a TRC of 1.11 which meets the cost-effectiveness requirement. The full results of the calculation can be found in Attachment 1, Appendix A, CleanPowerSF Cost Effectiveness Calculations.

#### *Accommodation of Statewide and Regional Programs*

As detailed in the Plan, CleanPowerSF's program will be a unique program offered exclusively to its customers.<sup>16</sup> Program marketing will be targeted to CleanPowerSF customers and will clearly describe which ratepayers will be eligible to participate.

#### *Auditing and Reporting*

CleanPowerSF performs annual financial audits using generally accepted accounting principles specific to governmental entities. These reports are publicly available and will be submitted to the Commission upon request. After CleanPowerSF's Plan is certified and the program launches, energy efficiency program administration data will be audited and reported in conformance with the Plan.

#### *Evaluation, Measurement and Verification (EM&V) Protocols*

CleanPowerSF intends to contract with an independent, third-party EM&V provider to conduct process evaluations and/or market studies to determine the effectiveness and needs for successful implementation of the program and future improvements. The Plan further details EM&V protocols.<sup>17</sup>

### **REQUEST**

The CleanPowerSF Energy Efficiency Program Plan, as described herein, comports with all of the requirements outlined by relevant statutory authority, as well as Commission decisions and resolutions. The attached Plan and related appendices further explain how the Plan is consistent with the goals of the programs established pursuant to Section 381.1 and Section 399.4. Thus, CleanPowerSF requests that the Commission certify the Plan via a resolution.

### **ATTACHMENTS**

Attachment 1: CleanPowerSF Energy Efficiency Program Plan  
Attachment 1, Appendix A: CleanPowerSF Cost Effectiveness Calculations  
Attachment 1, Appendix B: CleanPowerSF CCA Maximum Funding

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<sup>16</sup> The Energy Efficiency Program Plan ("Plan"), Attachment 1, p. 19.

<sup>17</sup> The Energy Efficiency Program Plan ("Plan"), Attachment 1, p. 22.

## **TIER DESIGNATION**

Pursuant to General Order (GO) 96-B, Industry Rule 5.3, and Decision (D.) 14-02-033, CleanPowerSF submits this Advice Letter with a Tier 3 designation.

## **EFFECTIVE DATE**

This advice filing will become effective upon approval by the Commission via a resolution.

## **NOTICE**

Pursuant to D. 14-01-033, CleanPowerSF is serving copies of this advice letter to the R.13-11-005 service list. 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](mailto:Process_Office@cpuc.ca.gov).

## **PROTESTS**

\*\*Due to the COVID-19 pandemic and shelter at home orders, CleanPowerSF is currently unable to receive protests or responses to this Advice Letter vis U.S. Mail or fax. Please submit protests or responses to this Advice letter to [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov) and [PowerRegulatory@sfwater.org](mailto:PowerRegulatory@sfwater.org).

Anyone wishing to protest this advice letter filing may do so electronically. The protest must be received no later than September 7, twenty-two days after the date of this advice letter filing. Protests or responses to the advice letter must be filed with the Commission's Energy Division and served on the same day. Protests should be mailed to:

Energy Division  
Attention: Tariff Unit  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102  
E-mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Copies should be mailed to the attention of the Director, Energy Division, Room 4004 (same address above). In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted electronically to the attention of:

Michael Hyams, Director  
CleanPowerSF  
525 Golden Gate Ave, 7<sup>th</sup> Floor  
San Francisco, CA 94102  
Telephone: (628) 231-4548  
E-mail: [PowerRegulatory@sfwater.org](mailto:PowerRegulatory@sfwater.org)

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

For questions, please contact Julia Allman by e-mail at [jallman@sfwater.org](mailto:jallman@sfwater.org).



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Michael A. Hyams  
Director, CleanPowerSF  
San Francisco Public Utilities Commission, Power Enterprise  
525 Golden Gate Avenue, 7th Floor  
San Francisco, CA. 94102  
Phone: (628) 231-4548  
E-mail: [Mhyams@sfwater.com](mailto:Mhyams@sfwater.com)

Copy (via e-mail): Service List – R.13-11-005  
PG&E Tariffs ([AdviceTariffManager@pge.com](mailto:AdviceTariffManager@pge.com))

**ATTACHMENT 1**

**CLEANPOWERSF**

**ENERGY EFFICIENCY PROGRAM PLAN:**

**Community Food Service Energy Efficiency Program**

# **ENERGY EFFICIENCY PROGRAM PLAN**

## **INTRODUCTION**

CleanPowerSF, the Community Choice Aggregation (CCA) program of the City and County of San Francisco (“San Francisco” or “City”) is a program of the San Francisco Public Utilities Commission (SFPUC). The SFPUC is a department of the City that provides electric power to San Francisco’s municipal operations and select businesses, residents, and wholesale customers, as well as retail drinking water and sewer services to San Francisco.

On July 27, 2015, CleanPowerSF filed its Updated Implementation Plan with the California Public Utilities Commission (“Commission”) formalizing its intent to implement a CCA program. The Commission certified the Updated Implementation Plan on August 26, 2015 and in May 2016, CleanPowerSF began serving San Francisco residents and businesses, providing options to choose cleaner energy at competitive rates.

CleanPowerSF provides San Francisco electricity customers with additional choice in their energy supply and empowers residents and businesses to reduce their carbon footprint while supporting local jobs, stable energy prices and new clean energy infrastructure. To further that purpose, CleanPowerSF works toward the following goals:

1. Provide affordable and reliable service;
2. Develop an electricity portfolio that offers San Franciscans cleaner energy alternatives;
3. Invest revenues in new local renewable projects and jobs when feasible and cost-effective; and
4. Provide for long-term rate and financial stability.<sup>1</sup>

CleanPowerSF serves approximately 384,000 residential and business accounts in San Francisco, or 96% of total eligible accounts.<sup>2</sup> As the power provider to the majority of San Franciscans, CleanPowerSF is well positioned to provide additional energy services. Offering new energy efficiency services for San Francisco electricity customers is especially important with the transition of the San Francisco Energy Watch (“SFEW”) program, PG&E’s local government partnership (LGP) with San Francisco. Specifically, the SFEW LGP has shifted away from the direct installation of energy efficiency equipment with rebates to a new marketing and outreach program, “EnergyAccessSF.” The new LGP, administered by SFE, is designed to generate leads for PG&E and BayREN energy efficiency programs. As PG&E moves away from offering direct energy efficiency services through the SFEW program, CleanPowerSF seeks to fill the gap.

CleanPowerSF elects to become an administrator of ratepayer funds collected from its electric service customers through a non-bypassable charge authorized by the Commission for cost-effective energy efficiency and conservation programs. CleanPowerSF submits this program plan to the Commission for certification under California Public Utilities Code 381.1 (e) and (f) to

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<sup>1</sup> CleanPowerSF Business Plan and Risk Assessment. Available at <https://static1.squarespace.com/static/5a79fded4c326db242490272/t/5cf010bc8018e000011e078b/1559236800550/CleanPowerSF+Business+Plan+2015.pdf> [as of August 6, 2021].

<sup>2</sup> CleanPowerSF Quarterly Report to the San Francisco Public Utilities Commission, July 13, 2021. See p.2. 96% of eligible accounts derived from 4.1% opt-out rate. Available at <https://sfpuc.sharefile.com/share/view/sbe64ad7bb4554682a0236f8fd598a0fa> [as of August 6,, 2021]

administer one program: The CleanPowerSF Community Food Service Energy Efficiency Program (“Program”).

The Program will benefit from CleanPowerSF’s deep understanding of the community it serves, as well as the close partnership between CleanPowerSF’s parent agency, the SFPUC, and the San Francisco Department of the Environment (SFE). Both agencies have over forty years of combined experience in designing, administering, marketing and implementing energy efficiency programs – SFE through its administration of the SFEW program and its predecessors, and the SFPUC through its municipal utility, Hetch Hetchy Power, which provides energy efficiency programming for its customers. Thus, CleanPowerSF is well-positioned to maximize local benefits and is fully qualified to provide energy efficiency services to its customers.

CleanPowerSF puts forth this Plan to deliver services to non-residential ratepayers as approved by the San Francisco Public Utilities Commission<sup>3</sup>, pursuant to Public Utilities Code Sections 381.1 (e)-(f):

- (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.

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<sup>3</sup> San Francisco Public Utilities Commission Resolution 21-0120. Available at <https://sfpuc.sharefile.com/share/view/s9821882ad9fd437abae7e4e76a8917d2> [as of August 6, 2021]

## **PROGRAM PLAN SUMMARY**

The CleanPowerSF Community Food Service Energy Efficiency Program, a resource acquisition program, will target the food service sector, including grocery stores, corner stores, restaurants, and nonprofit institutions that assist vulnerable and underserved communities facing food insecurity.<sup>4</sup>

The bulk of program savings are expected to come from supermarkets and other grocery stores. These stores represent the largest targeted customer segment by usage, accounting for more than 9,000 MWs in 2020 (see Table 3: Customer Count and Annual Usage by Customer Type below). Energy efficiency measures yield outsized benefits for grocery stores, where thin profit margins mean that \$1 in energy savings is the equivalent of increasing sales by \$59.<sup>5</sup> The Program aims to reach large supermarkets that may have worked with energy efficiency programs such as PG&E's EnergySmart Grocer and SFEW in the past, as well as medium and small businesses that historically have been difficult to reach. Targeting grocery stores of all sizes is especially important in San Francisco, where supermarkets and grocery stores range from small, locally-owned and managed operations to large operations with more than one hundred employees.<sup>6</sup>

As part of its comprehensive approach to food service, the Program also targets other businesses involved in moving food into the city and supplying it to the customer. This includes both large customers, such as refrigerated warehousing and storage, and small businesses such as corner stores, which may be the only source of fresh produce in certain neighborhoods. Existing programs established through the City's Office of Economic and Workforce Development that work with small grocers and corner stores are one avenue the program will leverage in reaching these customers.

Additionally, the Program aims to prioritize energy efficiency services for non-profit entities that serve vulnerable populations in the City, including community dining halls, food pantries, meal delivery services, and the infrastructure that supports them. In 2018, the San Francisco Department of Public Health's Food Security Task Force identified that one in four San Franciscans are at risk of food insecurity due to low income relative to the City's high cost of

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<sup>4</sup> Vulnerable communities include, but are not limited to, women, racial or ethnic groups, low-income individuals and families, individuals who are incarcerated and those who have been incarcerated, individuals with disabilities, individuals with mental health conditions, children, youth and young adults, seniors, immigrants and refugees, individuals who are limited-English proficient (LEP), and Lesbian, Gay, Bisexual, Transgender, Queer, and Questioning (LGBTQQ) communities, or combinations of these populations. California Health and Safety Code Section 131019.5.

<sup>5</sup> Environmental Protection Agency, "Supermarkets: An Overview of Energy Efficiency and Opportunities" Available at <https://www.energystar.gov/sites/default/files/buildings/tools/SPP%20Sales%20Flyer%20for%20Supermarkets%20and%20Grocery%20Stores.pdf> [as of August 6, 2021]

<sup>6</sup> U.S. Census Bureau, "County Business Patterns by Legal Form of Organization and Employment Size Class." Available at [https://data.census.gov/cedsci/table?n=445110&g=0500000US06075&tid=CBP2017.CB1700CBP&hidePreview=false&vintage=2017&layer=VT\\_2017\\_050\\_00\\_PY\\_D1&cid=EMP](https://data.census.gov/cedsci/table?n=445110&g=0500000US06075&tid=CBP2017.CB1700CBP&hidePreview=false&vintage=2017&layer=VT_2017_050_00_PY_D1&cid=EMP) [as of August 6, 2021]

living.<sup>7</sup> Moreover, data from the 2015-2016 California Health Interview Survey indicate that food insecurity in San Francisco is increasing: 50% of low income residents surveyed in San Francisco reported food insecurity compared with 44% in 2013-14.<sup>8</sup>

One of the Food Security Task Force’s top recommendations for increasing food security in the wake of the COVID-19 pandemic is to “Target economic stimulus recovery through direct cash support, jobs, and business development, with a focus on food for vulnerable communities and provided by businesses owned by communities most impacted by COVID19.”<sup>9</sup> In its previous report in 2018, the Task Force recommended “[making] investments in infrastructure to eliminate waitlists and other barriers to critical services.”<sup>10</sup> The Program aims to meet these objectives by providing support to community food services and businesses in the form of energy improvements to their facilities. These improvements can increase facilities’ service capacity while reducing energy costs, thus increasing resources to support the communities they serve.

Finally, the program will serve San Francisco’s diverse restaurant sector. This was a sector with high turnover even before the devastating effects of COVID-19 and the Shelter-In-Place Ordinance. The Program will draw on years of previous implementation in the sector, implement a diverse food-service measure list, and seek to leverage outside funds to make energy efficiency accessible to this recovering business sector.

The outbreak of COVID-19 has further threatened the food security of many San Francisco residents and severely impacted the City’s food service and restaurant industry. A May 5, 2020 survey conducted by the Golden Gate Restaurant Association found that 68% of restaurants in the City had closed temporarily as a result of COVID, with an unknown percentage of those planning to reopen post-outbreak.<sup>11</sup> Food banks and meal services are experiencing unprecedented demand, with the San Francisco-Marin Food Bank, San Francisco’s largest food bank, abruptly faced with supplying food 55,000 households every week, more than double those it served prior to the pandemic.<sup>12</sup> The Program aims to support these service organizations by decreasing energy costs, allowing more funds to be directed toward community needs.

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<sup>7</sup> San Francisco Department of Public Health, Food Security Task Force, “2018 Assessment of Food Security,” p.12. Available at <<https://www.sfdph.org/dph/files/mtgsGrps/FoodSecTaskFrc/docs/FSTF-2018-Assessment-Of-FoodSecurity.pdf>> [as of August 6, 2021]

<sup>8</sup> San Francisco Department of Public Health, Food Security Task Force, “2018 Assessment of Food Security,” p.6 Available at <<https://www.sfdph.org/dph/files/mtgsGrps/FoodSecTaskFrc/docs/FSTF-2018-Assessment-Of-FoodSecurity.pdf>> [as of August 6, 2021]

<sup>9</sup> San Francisco Department of Public Health, Food Security Task Force, “2021 Food Security Recommendations.” Available at <[https://www.sfdph.org/dph/files/mtgsGrps/FoodSecTaskFrc/docs/2021\\_FSTF\\_Recommendations.pdf](https://www.sfdph.org/dph/files/mtgsGrps/FoodSecTaskFrc/docs/2021_FSTF_Recommendations.pdf)> [as of August 6, 2021]

<sup>10</sup> San Francisco Department of Public Health, Food Security Task Force, “2018 Assessment of Food Security,” p.7. Available at: <<https://www.sfdph.org/dph/files/mtgsGrps/FoodSecTaskFrc/docs/FSTF-2018-Assessment-Of-FoodSecurity.pdf>> [as of August 6, 2021].

<sup>11</sup> Golden Gate Restaurant Association, “[San Francisco Restaurants Questionnaire: Survey Distributed May 5<sup>th</sup>.](https://cdn.vox-cdn.com/uploads/chorus_asset/file/19984755/Shared_San_Francisco_Restaurants_Questionnaire_Results_Analysis.pdf)” Available at: <[https://cdn.vox-cdn.com/uploads/chorus\\_asset/file/19984755/Shared\\_San\\_Francisco\\_Restaurants\\_Questionnaire\\_Results\\_Analysis.pdf](https://cdn.vox-cdn.com/uploads/chorus_asset/file/19984755/Shared_San_Francisco_Restaurants_Questionnaire_Results_Analysis.pdf)> [as of August 6, 2021].

<sup>12</sup> SF-Marin Food Bank. Available at: <<https://www.sfmfoodbank.org/covid-one-year/>> [as of August 6, 2021].



Additionally, customer cost savings could play a critical role in helping heavily impacted food service businesses recover, and support San Francisco’s local economy.

Furthermore, the Program is positioned to make meaningful contributions to San Francisco’s goal of Net-Zero Emissions by 2050 and the State’s goal to double energy efficiency savings by 2030.<sup>13</sup> The Program also contributes directly to CleanPowerSF’s goal of contributing to local renewable projects and local jobs, per CleanPowerSF’s Business Plan and Risk Assessment:

- CleanPowerSF will meet its renewable goals, to the extent feasible, through new, preferably local renewable generating capacity and demand-side efforts, including energy efficiency and conservation programs.<sup>14</sup>

The Program will provide cost-effective energy efficiency retrofits, using a population-based normalized metered energy consumption (NMEC) approach to serve CleanPowerSF commercial customers listed in Table 3, in the section “Market Sector Targeted.” As an alternative to the traditional “custom” or “deemed” program design, NMEC program design enables program administrators to provide rebates for energy efficiency retrofits using an overall reduction in metered consumption. Within NMEC program design, there are two different approaches: 1) site specific and 2) population. The Program will deploy the population approach. Further description of how this approach will be applied to account for changes due to the COVID-19 pandemic is contained in the following section.

Over the three years, the Program’s estimated cost-effectiveness, as measured by the total resource cost test (TRC), is 1.11 and the program administrator cost test (PAC) is 1.11. The Program’s metrics and budgets are described in Table 1 and Table 2, respectively.

**Table 1: Metrics At-a-Glance**

<b>Year</b>	<b>kWh Savings</b>	<b>Percentage of 3-year Goal</b>
1	1,783,719	33.33%
2	1,783,719	33.33%
3	1,784,254	33.34%
Total	5,351,693	100%

<sup>13</sup> CA Senate Bill (SB) 350. California Energy Commission. Available at: <<https://www.energy.ca.gov/sb350/>> [as of July 9, 2021].

<sup>14</sup> CleanPowerSF Business Plan and Risk Assessment p. 7. Available at: <<https://static1.squarespace.com/static/5a79fded4c326db242490272/t/5cf010bc8018e000011e078b/1559236800550/CleanPowerSF+Business+Plan+2015.pdf>> [as of August 6, 2021].

**Table 2: Budgets At-a-Glance**

<b>Cost Category / Program Function</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Total</b>
Administration	\$ 152,635	\$ 152,635	\$ 152,635	\$ 457,905
Marketing, Education and Outreach	\$ 91,581	\$ 91,581	\$ 91,581	\$ 274,743
Direct Implementation Non Incentive	\$ 501,471	\$ 501,471	\$ 501,471	\$ 1,504,413
Direct Implementation Incentive	\$ 763,176	\$ 763,176	\$ 763,176	\$ 2,289,528
EM&V	\$ 17,489	\$ 17,489	\$ 17,489	\$ 52,467
<b>Program Budget</b>	<b>\$ 1,526,352</b>	<b>\$ 1,526,352</b>	<b>\$ 1,526,352</b>	<b>\$ 4,579,056</b>

The Program will be built upon the foundations formed by the BayREN Business program to leverage existing ratepayer investment, reduce time to launch, develop economies of scale in M&V costs, and to achieve or exceed the cost-effectiveness requirement. To eliminate market confusion, the Program and BayREN Business will serve distinct sectors, with separate marketing collateral, M&V databases, and accounting ledgers. The Program aims to serve the food service sector, while BayREN Business will continue to serve other small and medium business sectors, such as office, retail, and light manufacturing.

**A. Overview**

CleanPowerSF submits this Plan to enable the City to offer a cost-effective energy-resource program to San Francisco ratepayers. The Plan will address equity concerns, reduce emissions, bring energy and non-energy benefits to the community, and support recovery from the COVID-19 pandemic. Specifically, the Program will be tailored to serve the food service sector, and community sites providing food services to vulnerable and underserved populations facing food insecurity.

The Program has three primary objectives:

- 1) Secure energy savings from the target sector of businesses and community organizations in the food service industry;
- 2) Improve existing infrastructure for sites providing food service to vulnerable populations and support the economic recovery of restaurants and other food service businesses that have been negatively impacted by the COVID-19 pandemic by reducing their energy burden and expanding service capacity; and
- 3) Build upon the successes of previous energy efficiency programs serving grocery stores to achieve deeper energy savings in this sector.

CleanPowerSF recognizes that San Francisco is currently served by a number of successful energy efficiency programs, including BayREN’s suite of Residential and Business programs and PG&E’s local government partnership, San Francisco Energy Watch (SFEW), implemented

by SFE. The Program has been designed to complement those offerings by filling gaps while leveraging previous investments of ratepayer funds to launch an efficient and effective program.

The Program intends to fill the void in direct install programs left by local government partnerships as they transitioned to an outreach and referral model. Since 2006, SFEW has partnered with PG&E to successfully deliver energy efficiency retrofits, rebates and technical assistance, completing over 8,000 projects in every corner of the City. Based on SFEW project data collected between January 2008 and July 2020, over 62% of those projects consist of hard-to-reach and small and medium businesses (SMB). However, with recent industry and regulatory changes, all LGPs have shifted from delivering direct implementation services to piloting strategic energy resource programs for PG&E. For example, the new San Francisco LGP, “EnergyAccess SF,” aims to provide greater access to energy efficiency programs and financing for residents and small businesses in disadvantaged communities by using data analysis and community-based marketing tactics to recruit projects for referrals to existing and future third-party programs. EnergyAccess SF will neither conduct direct installation of equipment nor furnish rebates.

In addition to filling the LGP gap, CleanPowerSF has designed the Program to build upon the successes and innovation of current BayREN Business, an internationally recognized program.<sup>15</sup> Developed and led by SFE, the BayREN Business program strikes a balance between mounting pressures of cost-effectiveness and diminishing low-hanging fruits by deploying a population-based NMEC program design to serve SMBs. Concept development began in 2016 with the drafting of the commercial chapter of the BayREN Business Plan, resulting in Commission approval in 2018. Program ramp-up initiated in late 2018 and continued into 2019 with contracting and buildout of infrastructure and processes. These activities culminated in project enrollment in 2021.

The Program will utilize the same NMEC methodology and pay-for-performance model to measure energy savings and to compensate the program implementer, an energy service company (ESCO). By tying metered savings to compensation, known as “pay-for-performance,” the Program incentivizes the implementer to assure the achievement and persistence of energy savings. This program design reinforces quality installation, significantly reducing costly on-site inspections and other high-touch implementation costs. Finally, the pay-for-performance model conforms to the general program design guidelines described in D.18-05-041.

CleanPowerSF has considered how to best apply the NMEC program design to account for changes in energy usage patterns due to the COVID-19 pandemic. The pandemic has essentially become a severe and protracted non-routine event. The abrupt closure of many small businesses has significantly affected energy use in the baseline period, which if left unaddressed would

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<sup>15</sup> The Institute for European Energy and Climate Policy recognized the BayREN Business for its pay-for-performance program design in its final report, “Experience and Lessons Learned from Pay-for-Performance (P4P) pilots for Energy Efficiency.” See Section 3.2.9, Page 31, and Appendix B9. Available at <https://zenodo.org/record/3887823#.YOsZc-l7kYs> [as of August 6, 2021]

corrupt future savings estimates. Within the NMEC population approach, there are different Commission-approved measurement and verification (M&V) methodologies. A reliable and robust approach during this time is to compare pre- and post-retrofit energy usage by using a comparison group analysis. A comparison group analysis consists of using similar segments to compare against each other. Therefore, based on circumstances at the time of program launch, the Program will use a comparison group M&V methodology to calculate both gross and net energy savings and peak impacts.

Furthermore, CleanPowerSF will utilize an M&V procedure modeled on that of the BayREN Business Program. Doing so will leverage significant prior investments of ratepayer funding while allowing the Program to reduce start-up costs and time. BayREN Business' M&V procedure was carefully developed and vetted to comply with the Commission's "NMEC Rulebook" requirements. BayREN and SFE collaborated closely with a program implementer, an energy service company (ESCO), a third-party M&V provider, consultants, and PG&E to develop a reliable and secure data-pipeline to efficiently and accurately measure and verify meter data, and automatically calculate the resultant energy savings and corresponding compensation to the ESCO. BayREN and its program partners also sought to automate as much of the process as possible in an effort to drive down administration and implementation costs. The construction of this sophisticated infrastructure represents a significant ratepayer investment.

CleanPowerSF will be able to leverage the innovations forged by the BayREN Business Program, by co-implementing the Program with SFE. As the program lead for BayREN Business, SFE brings the experience, technical knowledge, and network required to quickly launch the Program and contribute to its success. In particular, SFE will offer institutional knowledge to inform the set-up of critical program infrastructure, such as databases, processes and manuals.

CleanPowerSF is mindful of separation of expenditures, energy savings attribution, avoidance of market confusion, joint cooperation with BayREN and other third-party programs, and compliance with Commission NMEC rules. The Program's accounting and savings attributions shall be distinct and separate from those of the BayREN Business Program, as the programs will be run by separate entities. The Program will have its own data-collection platform, electronic ledger for energy savings and expenditures, and program dashboards.

CleanPowerSF will utilize the following strategies to complement existing programs to the greatest possible extent:

- 1) To eliminate market confusion, the Program and ESCO will only target and serve the sites listed in Table 3, below.
- 2) By segmenting market sectors by programs, BayREN Business will have more budget to serve other SMB sectors in the City. At the same time, CleanPowerSF's targeted sector will receive expanded opportunities for energy efficiency services, savings, and other community benefits.

- 3) To provide comprehensive service, non-electrification natural gas savings measures and opportunities will be referred to BayREN Business or other third-party programs, as appropriate.

Together, these mitigation strategies will ensure that program expenditures are not commingled, energy savings are accurately attributed, and market confusion is suppressed.

Program roles and responsibilities will be clear from the start. CleanPowerSF is the program administrator. As such, CleanPowerSF will be responsible for administration, regulatory compliance and reporting, and budget. CleanPowerSF will also lead marketing, as described in the Section E, “Marketing and Outreach.” SFE shall support CleanPowerSF with program implementation assistance, quality assurance, technical assistance, and third-party referrals.

Program staff are also cognizant that PG&E’s new third-party programs will soon launch. CleanPowerSF understands that the NMEC program approach is not suited for all commercial and food service sites. Therefore, CleanPowerSF is committed to providing the best outcomes for its customers, which will include making referrals to PG&E programs, as appropriate.

Finally, CleanPowerSF will explore opportunities to leverage other sources of industry knowledge and funding to boost the cost-effectiveness of its program and its positive impact on customers. For example, the Program will leverage the unparalleled knowledge of the Food Service Technology Center (“FSTC”) to inform energy efficiency measure offerings for the food service sector. The FSTC has been promoting sustainable energy operations in commercial food service for over thirty years in the Bay Area and beyond and will provide guidance on the best practices for optimizing operational performance and saving energy. Additionally, to support the many SMBs impacted by the pandemic, the Program shall explore layering EE ratepayer funds over other, non-ratepayer resources such as grants and loans from the BayREN Microloan program and the Coronavirus Aid, Relief, and Economic Security (“CARES”) Act. Leveraging these resources would free up the businesses’ cash flow to fund other operational activities.

## B. Market Sector Targeted

The Program will target the City’s food service sector, community food service facilities and non-profit organizations serving the City’s vulnerable populations. Customers receiving CleanPowerSF electric generation service will be eligible. The types of businesses to be served by the Program and their latest electricity consumption are shown in Table 3, below.

**Table 3: Customer Count and Annual Electricity Usage by Business Type**

<b>Business Type (NAICS)</b>	<b>Customer Count as of 2020</b>	<b>Annual Electricity Usage (kWh)</b>
Beer, Wine, and Liquor Stores	198	8,387,371
Community Food Services	10	996,381
Confectionery and Nut Stores	29	640,358
Convenience Stores	87	5,230,218
Fish and Seafood Markets	17	1,361,691
Fish and Seafood Wholesale	15	1,443,794
Fresh Fruit & Vegetable Wholesale	52	3,971,297
Fruit and Vegetable Markets	55	2,385,065
Full-Service Restaurants	278	13,660,182
Gas Stations with Convenience	12	783,907
Grocery Stores	79	4,730,682
Grocery & Related Product Wholesale	8	556,338
Limited-Service Restaurants	525	24,411,983
Meat and Meat Product Wholesale	3	719,210
Meat Markets	38	2,452,554
Meat Processing Facilities	5	3,630,882
Other Community Housing Services	34	2,545,590
Other Specialty Food Stores	97	3,219,916
Refrigerated Warehousing-Storage	16	3,405,124
Restaurants and Other Eating Places	66	2,354,421
Supermarkets-Other Grocery	529	88,410,331
Temporary Shelters	15	1,161,898
<b>Grand Total</b>	<b>2,168</b>	<b>176,459,193</b>

Overall, potential participants belong to the following market segments:

Grocery Stores: These businesses have high hours of operation as well as energy intensive equipment which present significant energy savings opportunities. The small to medium grocery stores tend to have small operating margins and any reduction in costs delivers benefits for the store and the community which relies on these businesses to provide access to fresh food. Many of these stores are in communities where English may not be the primary language.

- Geography: Throughout the City, targeting small- to medium- sized grocery stores (independent or small chains) as well as larger corporate grocery stores.
- Applicable measures: There remains potential for efficient reach-in and display cases, solid door refrigerators and freezers, built-up walk-in units, some linear fluorescent lighting (likely older fluorescent lamps), ice machines, small food service/preparation appliances (such as combi-ovens and warmers), and packaged AC/heating units. Larger grocery stores may have additional potential in fryers, cooktops, and hood fan ventilation controls.
- Examples of small- to medium- sized customers include: Grocery Outlet, Bi-Rite, Gus' Market, Rainbow Grocery, Andronico's, Luke's Local, Mollie Stone's, Bryan's, New May Wah Supermarket, Nijiya Market, Falletti's, Other Avenues, San Bruno Supermarket, etc. Potential large grocery customers include: Safeway, Trader Joe's, Foods Co., Lucky, Sprouts, Cal-Mart, and Whole Foods.

Restaurants: This market segment has potential with energy intensive equipment, but also experiences dramatic turnover year over year.

- Geography: Throughout the City, but more concentrated in the most densely populated areas and large commercial districts such as downtown.
- Applicable Measures: Linear fluorescent and accent lighting, built-up refrigerated coolers and freezers, reach-in units, on-site food preparation (ovens, fryers, cooktops, etc.), domestic hot water, packaged AC/heating units; hood fan ventilation controls (in the largest restaurants).
- Customer categories and examples include all of the following: fine dining, fast casual, café, fast food.

Community Food Service: This market segment includes a wide range of facilities where food is offered for free or below market price, or where meals are prepared offsite and delivered for consumption. Facilities may have some combination of on-site food preparation, dining areas, refrigerated food storage, office space, and areas for other social and medical services.

- Geography: Throughout the City, but heavily concentrated in neighborhoods such as South of Market Area ("SOMA"), Chinatown, the Mission and the Bayview.
- Applicable Measures: Linear fluorescent and high-bay lighting, built-up refrigerated units/rooms, on-site food preparation (ovens, fryers, cooktops, etc.), domestic hot water, packaged AC/heating units; hood fan ventilation controls, laundry.

- Customer categories and examples include the following:
  - Child & Senior Care Centers, Schools, Out-of-School Meal Centers Preparation & Delivery Centers: Meals on Wheels and Food Runners are examples of the organizations that prepare and deliver food to seniors and people with disabilities.
  - Free Dining Rooms: Organizations such as GLIDE and St. Anthony’s Dining Room provide essential prepared meals for residents in need.
  - Free Groceries/Food Pantries: SF-Marin Food Bank, The Salvation Army, Bread Connection.
  - Support Centers: Commercial sites that support San Francisco’s free dining rooms and pantries with food service activities such as storage, packaging and distribution, refrigeration, preparation and delivery.

Large Refrigerated Warehouses: These facilities have one of the highest building type energy intensities in the commercial sector and represent a strong candidate for reducing energy consumption and improving cooling performance. Although some have been served by other programs, many of the remaining refrigeration project measures will likely be custom/NMEC type. The Program will leverage earlier work from SFE pilot programs, such as “Keep It Tuned” and Bay Area Air Quality Management District-funded “SFE Small Refrigeration Pilot,” to further market transformation.

- Geography: Clustered in southeastern part of the City, especially around the Industrial Triangle (including the SF Wholesale Produce Market).
- Applicable measures: These spaces have the potential for both high-bay and exterior lighting, large motor replacement to electronic commutating motor (ECM) and controls and rebuild of large refrigeration systems, as well as smaller solid-door cases. The supporting office spaces are expected to have typical linear fluorescent lighting, likely T8 and T12 lamps.
- Example customers include: Earl’s Organic Produce, Vegiworks, Good Eggs, Happy Farm Produce, Great West Gourmet.



### **C. Deliverables**

The Program will provide direct installation of equipment (“measures”) tailored to the food service sector. CleanPowerSF will enlist an ESCO that agrees to a negotiated, fixed fuel price for energy reductions as \$/kWh. The ESCO will provide turnkey services including customer pre-qualification, securing customer consent to access usage via PG&E’s “ShareMyData” platform, and conducting an engineering assessment. The assessment will include recommendations and energy savings potential compiled in an energy management plan. The ESCO will specify new equipment; coordinate and schedule installation; and conduct commissioning and training.

The following is a list of proposed upgrade measures:

- Lighting and Controls
- Refrigeration Equipment and Optimization
- HVAC Controls and Optimization
- Electric Food Service Equipment
- Electrification Measures (after Year 1)

### **D. Project Innovation**

A notable innovation of CleanPowerSF’s Program is its use of BayREN Business’s existing infrastructure as a model to reduce upfront costs and time. With this approach, CleanPowerSF is piloting a means for other California CCAs to work cooperatively with their Regional Energy Networks (RENs) to reduce administration costs, improve cost-effectiveness of both administrators’ programs and to expand energy efficiency services to more customers. This pilot holds the potential to scale not only in the Bay Area, but also throughout the state as more CCAs and RENs are formed. To serve SMBs and underserved sectors the Program also employs the NMEC approach, which remains nascent and is beginning to mature with the approval of the first edition of the Commission NMEC Rulebook.

## E. Project Process (Customer Journey) Overview

### Task 1 – Marketing and Outreach

Program marketing and outreach will be conducted jointly by CleanPowerSF, SFE, and the ESCO. Together, they will drive direct marketing and outreach, each with its separate roles and responsibilities. SFE brings valuable experience and existing relationships from implementing SFEW. CleanPowerSF and SFE will coordinate with other City departments and agencies to identify efficiencies in marketing and outreach. Local government agencies such as these have proven to be instrumental in identifying underserved populations and employing a community-based approach to expand program services.<sup>16</sup> Potential marketing and outreach channels are listed in Table 4.

- Step 1 – Targeting for Energy Savings Opportunity: SFE will lead this low-touch, high-impact effort to use advanced metering infrastructure (“AMI”) data to target potential program participants for opportunity. In collaboration with CleanPowerSF, SFE and the M&V Provider, the group will determine “goodness-of-fit” criteria, such as high peak loads, usage not conforming to heating degree days, etc. Next, the M&V Provider applies the criteria over AMI data to identify ideal sites. Additional data scraping, such as equipment energy use signatures, will refine the resulting list. Program staff then can tailor custom messages to recruit the targeted customers. By narrowing the pool of potentially eligible customers and developing tailored messages, marketing budget could be shifted to conduct community-based outreach.
- Step 2 – In-person Recruitment: A list of high-opportunity prospects will be developed from Step 1. The list will be further categorized based on marketing needs. More specifically, prospects with in-house resources and/or require less hand-holding to complete retrofits will be passed to the ESCO for marketing. Prospects that lack resources, such as micro businesses and non-profits will be passed to CleanPowerSF to conduct direct marketing and technical assistance (as needed). Afterwards, the warm leads will be transitioned to the ESCO for retrofit installation.

Due to the COVID-19 pandemic, in-person recruitment may be limited, but online and other approaches, such as social media, direct calls and custom-tailored emails, will be greatly expanded.

Beyond targeting and in-person and/or online recruitment, CleanPowerSF will deploy a collaborative, community-based approach to recruit property owners, contractors and business decision-makers through targeted collateral, local events, and other media. CleanPowerSF has expertise in developing high-impact marketing collateral and will lead the development of messaging for mailers and social media marketing to promote the program to SMBs, community

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<sup>16</sup> Power to the People: Using Community-Based Approaches to Deliver Efficiency and Sustainability to Hard-to-Reach Populations. Meghan G. Bean and Marjorie McRae, Research Into Action. 2016 ACEEE Summer Study on Energy Efficiency in Buildings. Available at: <[https://www.aceee.org/files/proceedings/2016/data/papers/11\\_943.pdf](https://www.aceee.org/files/proceedings/2016/data/papers/11_943.pdf)> [as of August 6, 2021]

food service facilities and shelters, with input from SFE. Together, CleanPowerSF and SFE will tailor program messaging to fit the needs of the individual communities the program serves. CleanPowerSF will develop and distribute customer recognition collateral and case studies with program success stories.

Overall, CleanPowerSF is uniquely well-positioned to plan and organize local in-person events with support from SFE. CleanPowerSF and SFE bring extensive experience in conducting workshops, tabling events, and providing presentations to communities. Outreach activities will include presentations and training on program elements to support community partnerships, as has been shown to be helpful in extending programs to hard-to-reach customers.<sup>17</sup>

Potential marketing and outreach channels include but are not limited to those listed below in Table 4.

**Table 4: Outreach Channels for CleanPowerSF Program**

<b>Type</b>	<b>Organization</b>
Regional Government	Association of Bay Area Governments / BayREN
Local Government	Office of Small Business
Local Government	Mayor's Office - Advisor on Environment
Local Government	Department of Public Health (community food service)
Local Government	Department of Homelessness (shelters)
Local Government	Office of Economic and Workforce Development
Industry	CalCCA
Industry	California Efficiency + Demand Management Council
Industry	Arab Grocers Association
Industry	Various San Francisco Merchant Associations
Industry	San Francisco Chamber of Commerce
Industry	Golden Gate Restaurant Association
Industry	Small Business Utility Advocates
Industry	California Grocers Association
Industry	Lighting and lighting equipment contractors
Industry	Lighting and lighting equipment vendors
Non-profit	Emerald Cities

<sup>17</sup> Ibid.

Type	Organization
Utility	PG&E

Task 2 – Customer Acquisition

After the recruited customer has expressed interest in the Program, the ESCO completes a site visit (which may be conducted virtually) to assess energy savings opportunities and presents them to the customer in an Energy Management Plan (“EMP”). The customer then selects recommendations from the EMP and enters into a contract with the ESCO to install the new equipment and to share metered data for a fixed time. The ESCO funds 100% of the eligible up-front project cost, which virtually eliminates the “customer copay” barrier in SMB sectors. The ESCO is made whole and profitable from Program incentives paid by CleanPowerSF combined with the utility cost savings paid by the customer per their agreement with the ESCO. Since the risk of underperformance lies with the ESCO, it is highly incented to accurately forecast the energy savings.

CleanPowerSF will work with the ESCO to determine if BayREN Business program’s Energy Management Plan (EMP) template and reporting templates are appropriate for the customers in the Program’s market sector. The BayREN EMP is a report that includes audit results, upgrade recommendations, cost-benefit analysis, ESCO and customer contact information, and how to take action to implement the EMP.

Task 3 – Equipment Installation and Quality Assurance / Control

After the customer executes the contract and data-sharing consent is granted, the ESCO will conduct installation via its pool of pre-qualified and vetted installation contractors. Each installation contractor will work with the customer to schedule and install the measures selected. CleanPowerSF will perform in-field inspections on a sampling of the installed projects to ensure consistency with program requirements. Again, since the ESCO’s compensation is a pay-for-performance structure, the ESCO is strongly incented to install reliable and enduring equipment.

Once the equipment installation begins, the project transitions from the meter-baseline period to a meter-performance period. During the meter-performance period, the M&V provider measures and verifies the incoming meter-data. As a part of the verification process, the Program, ESCO and M&V provider will identify, investigate and course-correct any significant anomalies in the data. This provides another layer of assurance of energy savings persistence, so that ratepayers are not paying for non-existent savings.

**F. Commencement Date and Activities**

The program will begin following Commission approval and will run for three continuous calendar years. The timeline for the tasks is as follows.

- Task 1 – Marketing and Outreach: Month 01 to Month 34
- Task 2 – Customer Acquisition: Month 02 to Month 34
- Task 3 – Equipment Installation and Quality Assurance / Control: Month 03 to Month 36

**G. Cost-effectiveness Analysis**

CleanPowerSF performed cost-effectiveness analysis in accordance with the methodologies included in the California Standard Practices Manual, using deemed values and a modified custom lighting calculator previously used in PG&E territory, due to the direct territorial relationship between PG&E’s existing program and CleanPowerSF energy efficiency program. For the custom HVAC measures, CleanPowerSF used cost and savings information from a program implementer for evaporative pre-cooling and HVAC economizer type technologies. To estimate market potential, CleanPowerSF used actual 2020 energy usage data and removed accounts that would be ineligible for the program because they receive their electricity generation service from PG&E or Direct Access providers. Finally, CleanPowerSF solicited market data and business intelligence to inform its metrics, such as per site savings, depth of savings, and total annual savings. As a result, the TRC derived is 1.11 and the PAC is 1.11 for the three-year program. The full results of the calculation can be found in Appendix A: CleanPowerSF Cost Effectiveness Calculations.

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

First Year Gross energy savings goals for the program will be 1,877,599 kWh with 225 kW of demand reduction. Additionally, because the Program has a focus on serving underserved and hard-to-reach commercial customers, CleanPowerSF will track how many of these customers are served by the Program. Additional measures of success are discussed in the “Performance Metrics” section.

**I. Budget**

The three-year budget for the CleanPowerSF Community Food Service Energy Efficiency Program is \$4,579,056. The budget breakdown can be found in Table 5, below.

**Table 5: CleanPowerSF Three-Year Program Budget**

<b>Program Function</b>	<b>Budget Amount</b>
Administration	\$ 457,905
Marketing, Education and Outreach	\$ 274,743
Direct Implementation Non Incentive	\$ 1,504,413
Direct Implementation Incentive	\$ 2,289,528
EM&V	\$ 52,467
<b>Program Budget</b>	<b>\$ 4,579,056</b>

## **J. Collaboration with Existing Programs**

As mentioned in the “Program Overview,” the Program is collaborating with BayREN Business to expand the reach of energy efficiency services and rebates to the City’s food service sector, including non-profit social service organizations. Each program has its own market sectors, and together, a much greater number of sectors will be touched. CleanPowerSF intends to work closely with new PG&E third-party programs to provide the best outcome for CleanPowerSF’s customers. Finally, as a part of the SFPUC, CleanPowerSF intends to refer qualifying sites to SFPUC’s water conservation programs.

### **CONSISTENCY WITH COMMISSION REQUIREMENTS**

The Program will deliver cost-effective energy savings to customers of CleanPowerSF along with benefits such as utility cost reduction. These outcomes support the movement toward zero net energy as envisioned in the California Energy Efficiency Strategic Plan.

CleanPowerSF complies with the mandate set forth in Public Utilities Code Section 399.4 authorizing the following types of programs: market transformation, pay-for-performance, and programs that achieve savings through operational, behavioral, and retro commissioning activities. Per guidance outlined in Section 399.4, customers will be reasonably compensated for developing and implementing an energy efficiency plan, and a portion of incentives will be reserved pending post-project measurement results.

CleanPowerSF’s energy efficiency program has been thoughtfully and carefully designed to serve the public interest and meet all the requirements for the program:

- The Program is consistent with broader regional or statewide energy efficiency programs and is designed to collaborate with programs run by other administrators. While providing a program that is consistent with broader programs implemented by other administrators, CleanPowerSF will disseminate marketing materials and program information that clearly differentiate the Program and prevent customer confusion.
- The Program aligns with the cost-effectiveness standard articulated in section 381.1 providing cost-effective energy efficiency improvements to underserved and hard-to-reach commercial customers. In targeting SMB generally and focusing on specific market sectors, CleanPowerSF is serving an underserved market. Accordingly, the cost-effectiveness test uses the appropriate NMEC Net-to-Gross (NTG) ratio of 0.95. Cost-effectiveness analysis conducted ensures that CleanPowerSF is optimizing CPUC energy efficiency funding for these and other programs.
- The Program will fulfill the Public Utilities Code Section 399.4 requirement that incentives be based on values and methodology stated in customer agreements and derived from measured results. CleanPowerSF considered the values ultimately used to generate the incentive value. Specifically, CleanPowerSF set the incentive rate based on

multiple factors including its impact on cost-effectiveness, how the rate compares to other programs' incentives, and feedback from program implementer.

- The Program will meet Section 399.4 requirement that participants comply with applicable permitting requirements. Participating contractors will be required to pull permits as required by code.
- The Program complies with general "Program Design Guidance" in CPUC D.18-05-041. Specifically, the Decision's Conclusions of Law 3.e. states that "*For performance-based programs, payment of customer and contractor incentives should tie, in significant part (50 percent or more), to independently verified savings performance estimated on a 12 month post-implementation period for capital projects and 24 months, if the project includes behavioral, retro-commissioning, or operational savings.*"<sup>18</sup> As such, the Program's NMEC design includes a two-year, post-installation, performance evaluation period. During this period, the Program will pay the implementer for the savings measured and verified at utility meters.
- The CPUC has endeavored to ensure program administrators cooperate with each other to avoid market confusion and expand energy efficiency to underserved and hard-to-reach commercial sectors, such as SMBs. The Program pilots a solution whereby the existing program is a vehicle to accelerate a new program. This approach expands coverage, eliminates duplication, and reduces administration costs.
- The COVID-19 pandemic has uprooted food service SMBs, notably restaurants, while significantly increasing demand on resources for community institutions such as food banks and local grocers. The Program will assist the food-service sector by layering EE ratepayer funds over other, non-ratepayer resources such as grants and loans from the BayREN Microloan program, and other resources as they become available. With years of delivering clean, reliable energy and energy-efficiency rebates and services, CleanPowerSF and SFE have earned the trust of the community. As such, they are the ideal partners to leverage ratepayer resources to help the City's SMB to rebuild and thrive again.

## **ACCOMMODATION OF STATEWIDE AND REGIONAL PROGRAMS**

CleanPowerSF has developed a strong identity as the electricity provider devoted to local decision making on power generation, energy conservation, and sustainability in the City. CleanPowerSF has clearly branded itself as unique from the existing for-profit electric utility and is well-known to its constituents. CleanPowerSF was designed, from the ground up, to offer residents and businesses within the City and County of San Francisco a viable alternative to power traditionally procured by PG&E. The Program that CleanPowerSF intends to elect to administer will be clearly distinguished as a unique program offered exclusively to CleanPowerSF customers by CleanPowerSF and SFE staff. Program marketing will be targeted

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<sup>18</sup> D-18-05-041, Conclusion of Law #3.e., P. 169-170.

to CleanPowerSF customers as well as clearly describing which ratepayers will be eligible to participate.

CleanPowerSF is directly governed by the San Francisco Public Utilities Commission, which consists of five Commissioners, nominated by the Mayor and approved by the San Francisco Board of Supervisors. Through this mechanism, CleanPowerSF's leadership is held accountable to the local community, and responds directly to that community's needs through direction from the Mayor and the elected officials of the Board of Supervisors. This structure means that CleanPowerSF is answerable to San Francisco residents both as customers and as a constituency responsible for electing its leadership.

CleanPowerSF programming directly responds to local needs but has the flexibility to leverage existing programming from BayREN and PG&E. CleanPowerSF will collaborate closely with SFE in all aspects of programming responsibilities. As the long-time implementer of the local government partnership with PG&E, SFEW, and BayREN single-family, multi-family and commercial programs, SFE represents a wealth of program implementation and customer-acquisition experience and has up-to-date knowledge of PG&E and BayREN programs. Together, CleanPowerSF and SFE staff will make appropriate referrals, leverage programs, and eliminate customer confusion. Staff will coordinate with other program administrators to provide CleanPowerSF customers with the most accurate, up-to-date materials on available programs.

### **AUDITING AND REPORTING**

CleanPowerSF 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 upon request. As a municipal CCA, once CleanPowerSF's energy efficiency plan is certified and the Program begins, current auditing procedures will be applied to cover energy efficiency program funds. This will ensure appropriate accounting controls for the Program funds.

Per the requirement of the Governmental Accounting Standards Board, 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, CleanPowerSF 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 CleanPowerSF, including adherence to cost-effectiveness requirements.

When the CPUC establishes audit and reporting requirements for CCAs, CleanPowerSF will be prepared to provide a compliant audit plan, per direction in Resolution E4518.<sup>19</sup>

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<sup>19</sup> Resolution E-4518, p.17.



## **EM&V PROTOCOLS**

CleanPowerSF will contract with an independent, third-party EM&V provider to perform process evaluations or market studies to determine the effectiveness of the program.

CleanPowerSF-led studies will be performed according to the process of Commission oversight of IOU EM&V projects as detailed in the Energy Efficiency EM&V Plan. CleanPowerSF will be subject to the same protocol as investor owned utilities for CPUC-directed impact evaluations to determine actual energy savings, benefits, costs, and goal achievement as directed in D.05-01-055. CleanPowerSF estimates costs of \$52,467 during the three-year program to qualitatively evaluate the program and market.

CleanPowerSF-directed evaluations will evaluate market characterization, conditions and needs, identify any weaknesses in the program, and viable solutions to ameliorate those issues. The effects of the program will be measured in indirect program impacts (i.e., behavioral changes), and impacts to the market that resulted in induced market changes (i.e., job creation), while direct program impacts (i.e., energy savings) will be measured by the CPUC-directed impact evaluation. CleanPowerSF will refer to existing and current EM&V studies, led by IOUs and CPUC, to avoid duplication and expand on existing efforts.

The EM&V effort will draw upon data from program databases, program descriptions, current implementation plan, 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:

1. Compare CleanPowerSF program efforts with efforts for other programs.
2. Evaluate the successes, failures, and replicability of the program.
3. Evaluate the differences and unique qualities within San Francisco and determine how best to respond. Do they match original data collection and estimates prior to program launch?

## **PERFORMANCE METRICS**

The following Performance Metrics will indicate progress toward meeting the goals and objectives of the CPUC Energy Efficiency Strategic Plan and CleanPowerSF's goals and objectives. The specific objective of 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 commercial customers (381.1(f)(1))
- Cost-effectiveness tool ("CET") output.
- Tracking the Program cost-effectiveness quarterly (381.1(f)(2))
- Tracking customer non-energy benefits (381.1(f)(2))
- Number of projects referred to other EE programs (381.1(f)(3))
- Number of customers that did not fit other program offerings (381.1(f)(3))
- Percentage of customers audited who install at least one program measure. (381.1(f)(4))

- Percentage of recommended measures installed by customers. (381.1(f)(4))
- 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))
- Progress toward becoming a net-zero emissions city by 2050. (381.1(f)(1))

Within this section CleanPowerSF will summarize the specific metrics to use as targets against which to measure performance of the Program.

**Table 6: Program Installation Metrics**

Community Food Service Energy Efficiency Program				
	Year 1	Year 2	Year 3	Total
Retrofit Projects Completed	126	126	126	378

**Table 7: Program Market Penetration**

Community Food Service Energy Efficiency Program				
	Year 1	Year 2	Year 3	Total
Market Penetration	6%	6%	6%	18%

Penetration calculation based on 2,168 eligible CleanPowerSF customers. Baseline calculated on 2020 eligible customers, parsed to remove PG&E and Direct Access accounts.

**Table 8: Program Savings Metrics**

Community Food Service Energy Efficiency Program				
	Year 1	Year 2	Year 3	Total
Gross kWh	1,877,599	1,877,599	1,878,163	5,633,361
Net kWh	1,783,719	1,783,719	1,784,254	5,351,692
Gross kW	225	225	225	675
Net kW	213	213	214	640

**FUNDING DETERMINATION**

In consideration of CleanPowerSF’s plan to leverage innovations from existing program frameworks to reduce launch time, goals and budgets have been distributed evenly across all three years. Administration, marketing, education and outreach, direct implementation, and direct implementation non incentive costs will remain constant. Excepting the subcontracting for an installation contractor, CleanPowerSF and SFE will staff the positions necessary for administration of the program.

CPUC Resolution E-4518 explains that funding collection and program periods do not always correspond.<sup>20</sup> As such, there is no statutory requirement for funding collection to begin subsequent to CPUC certification of the plan. MEA (now named Marin Clean Energy) was provided a collection period beginning with the original draft submittal date. Based on this precedent, CleanPowerSF finds it reasonable to request the CPUC to direct transfer of energy efficiency funds collected from CleanPowerSF customers beginning on August 16, 2021, the date of filing of this Advice Letter.

**Table 9: Program Funding Determination**

	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Total</b>
Administration	\$ 152,635	\$ 152,635	\$ 152,635	<b>\$ 457,905</b>
Marketing, Education and Outreach	\$ 91,581	\$ 91,581	\$ 91,581	<b>\$ 274,743</b>
Direct Implementation Non Incentive	\$ 501,471	\$ 501,471	\$ 501,471	<b>\$ 1,504,413</b>
Direct Implementation Incentive	\$ 763,176	\$ 763,176	\$ 763,176	<b>\$ 2,289,528</b>
EM&V	\$ 17,489	\$ 17,489	\$ 17,489	<b>\$ 52,467</b>
<b>Program Budget</b>	<b>\$ 1,526,352</b>	<b>\$ 1,526,352</b>	<b>\$ 1,526,352</b>	<b>\$ 4,579,056</b>

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<sup>20</sup> Resolution E-4518, pp. 7-8.

# **APPENDIX A: CLEANPOWERSF COST EFFECTIVENESS CALCULATIONS**

JobID	PA	PrgID	CET_ID	GrossKWh	GrossKW	GrossThm	NetKWh
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - outdoor lighting - RSD2023Q3	12351.10535	0	0	11733.55008
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - outdoor lighting - RSD2022Q3	12351.10535	0	0	11733.55008
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - outdoor lighting - RSD2021Q3	12351.10535	0	0	11733.55008
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - outdoor lighting - Gro2023Q3	83852.46552	0	0	79659.84225
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - outdoor lighting - Gro2022Q3	83852.46552	0	0	79659.84225
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - outdoor lighting - Gro2021Q3	83852.46552	0	0	79659.84225
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - indoor lighting - RSD2023Q3	37059.84742	0	0	35206.85505
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - indoor lighting - RSD2022Q3	37059.84742	0	0	35206.85505
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - indoor lighting - RSD2021Q3	37059.84742	0	0	35206.85505
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - indoor lighting - Gro2023Q3	41848.32853	0	0	39755.9121
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - indoor lighting - Gro2022Q3	41848.32853	0	0	39755.9121
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - indoor lighting - Gro2021Q3	41848.32853	0	0	39755.9121
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - deemed - RSD2023Q3	464288.7579	103.2086464	0	441074.32
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - deemed - RSD2022Q3	464288.7579	103.2086464	0	441074.32
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - deemed - RSD2021Q3	464288.7579	103.2086464	0	441074.32
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - deemed - Gro2023Q3	1097455.528	121.2985043	0	1042582.751
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - deemed - Gro2022Q3	1097455.528	121.2985043	0	1042582.751
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - deemed - Gro2021Q3	1097455.528	121.2985043	0	1042582.751
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - custom HVAC - RSD2023Q3	40154.56674	0	0	38146.83841
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - custom HVAC - RSD2022Q3	40154.56674	0	0	38146.83841
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - custom HVAC - RSD2021Q3	40154.56674	0	0	38146.83841
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - custom HVAC - Gro2023Q3	100776.3473	0	0	95737.52992
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - custom HVAC - Gro2022Q3	100776.3473	0	0	95737.52992
44235	PGE	CPSF01	CPSF01 - 0.28/kwh - custom HVAC - Gro2021Q3	100776.3473	0	0	95737.52992

NetKW	NetThm	LifecycleGrossKWh	LifecycleGrossThm	LifecycleNetKWh	LifecycleNetThm	GoalAttainmentKWh
0	0	148213.2642	0	140802.601	0	12351.10535
0	0	148213.2642	0	140802.601	0	12351.10535
0	0	148213.2642	0	140802.601	0	12351.10535
0	0	1006229.586	0	955918.107	0	83852.46552
0	0	1006229.586	0	955918.107	0	83852.46552
0	0	1006229.586	0	955918.107	0	83852.46552
0	0	444718.169	0	422482.2605	0	37059.84742
0	0	444718.169	0	422482.2605	0	37059.84742
0	0	444718.169	0	422482.2605	0	37059.84742
0	0	502179.9423	0	477070.9452	0	41848.32853
0	0	502179.9423	0	477070.9452	0	41848.32853
0	0	502179.9423	0	477070.9452	0	41848.32853
98.04821407	0	4922972.469	0	4676823.846	0	464288.7579
98.04821407	0	4922972.469	0	4676823.846	0	464288.7579
98.04821407	0	4922972.469	0	4676823.846	0	464288.7579
115.233579	0	12891974.34	0	12247375.62	0	1097455.528
115.233579	0	12891974.34	0	12247375.62	0	1097455.528
115.233579	0	12891974.34	0	12247375.62	0	1097455.528
0	0	301159.2506	0	286101.288	0	40154.56674
0	0	301159.2506	0	286101.288	0	40154.56674
0	0	301159.2506	0	286101.288	0	40154.56674
0	0	1007763.473	0	957375.2992	0	100776.3473
0	0	1007763.473	0	957375.2992	0	100776.3473
0	0	1007763.473	0	957375.2992	0	100776.3473

GoalAttainmentKW	GoalAttainmentThm	FirstYearGrossKWh	FirstYearGrossKW	FirstYearGrossThm	FirstYearNetKWh
0	0	12351.10535	0	0	11733.55008
0	0	12351.10535	0	0	11733.55008
0	0	12351.10535	0	0	11733.55008
0	0	83852.46552	0	0	79659.84225
0	0	83852.46552	0	0	79659.84225
0	0	83852.46552	0	0	79659.84225
0	0	37059.84742	0	0	35206.85505
0	0	37059.84742	0	0	35206.85505
0	0	37059.84742	0	0	35206.85505
0	0	41848.32853	0	0	39755.9121
0	0	41848.32853	0	0	39755.9121
0	0	41848.32853	0	0	39755.9121
103.2086464	0	464288.7579	103.2086464	0	441074.32
103.2086464	0	464288.7579	103.2086464	0	441074.32
103.2086464	0	464288.7579	103.2086464	0	441074.32
121.2985043	0	1097455.528	121.2985043	0	1042582.751
121.2985043	0	1097455.528	121.2985043	0	1042582.751
121.2985043	0	1097455.528	121.2985043	0	1042582.751
0	0	40154.56674	0	0	38146.83841
0	0	40154.56674	0	0	38146.83841
0	0	40154.56674	0	0	38146.83841
0	0	100776.3473	0	0	95737.52992
0	0	100776.3473	0	0	95737.52992
0	0	100776.3473	0	0	95737.52992

FirstYearNetKW	FirstYearNetThm	WeightedSavings	ElecBen	GasBen	ElecBenGross	GasBenGross	TRCCost
0	0	0.002192493	10749.59521	0	11315.36338	0	9301.726828
0	0	0.002192493	10783.19879	0	11350.73557	0	9656.239615
0	0	0.002192493	10847.83656	0	11418.77533	0	10051.91207
0	0	0.01488498	72979.70801	0	76820.74527	0	42124.22792
0	0	0.01488498	73207.84489	0	77060.88936	0	42873.61134
0	0	0.01488498	73646.67496	0	77522.81575	0	43771.76078
0	0	0.006578639	31601.59791	0	33264.83991	0	29747.54633
0	0	0.006578639	31861.37368	0	33538.28809	0	31054.04018
0	0	0.006578639	32261.73997	0	33959.72628	0	32519.43549
0	0	0.007428661	35684.82181	0	37562.97032	0	33591.2091
0	0	0.007428661	35978.16305	0	37871.75058	0	35066.51423
0	0	0.007428661	36430.26044	0	38347.64256	0	36721.25239
98.04821407	0	0.08241772	352777.1897	0	371344.4102	0	382903.9724
98.04821407	0	0.08241772	353507.0801	0	372112.7159	0	400485.1479
98.04821407	0	0.08241772	355241.0115	0	373937.9068	0	419892.9012
115.233579	0	0.194813639	921006.8293	0	969480.873	0	630557.4334
115.233579	0	0.194813639	923605.4358	0	972216.2482	0	647684.0382
115.233579	0	0.194813639	928634.9557	0	977510.4797	0	667196.8803
0	0	0.007127995	21880.55479	0	23032.16294	0	55326.61403
0	0	0.007127995	22008.64686	0	23166.99669	0	58944.80624
0	0	0.007127995	22247.57198	0	23418.49682	0	62895.34597
0	0	0.017889205	72969.52909	0	76810.03062	0	143137.9741
0	0	0.017889205	73494.90216	0	77363.05491	0	151988.7992
0	0	0.017889205	74378.62204	0	78293.28636	0	161684.9103



PACCost	TRCCostGross	TRCCostNoAdmin	PACCostNoAdmin	TRCRatio	PACRatio	TRCRatioNoAdmin
9301.726828	9301.726828	4298.888107	4298.888107	1.15565587	1.15565587	2.500552456
9656.239615	9656.239615	4637.761861	4637.761861	1.116707872	1.116707872	2.325086779
10051.91207	10051.91207	5003.352035	5003.352035	1.079181402	1.079181402	2.168113793
42124.22792	42124.22792	8159.627216	8159.627216	1.73248773	1.73248773	8.944000268
42873.61134	42873.61134	8802.836213	8802.836213	1.707526905	1.707526905	8.316392935
43771.76078	43771.76078	9496.755074	9496.755074	1.682515705	1.682515705	7.754930435
29747.54633	29747.54633	15040.22996	15040.22996	1.062326202	1.062326202	2.101137948
31054.04018	31054.04018	16225.82471	16225.82471	1.025997696	1.025997696	1.963621217
32519.43549	32519.43549	17504.89041	17504.89041	0.992075646	0.992075646	1.843012965
33591.2091	33591.2091	16983.56902	16983.56902	1.062326209	1.062326209	2.101137975
35066.51423	35066.51423	18322.35376	18322.35376	1.025997703	1.025997703	1.963621243
36721.25239	36721.25239	19766.68676	19766.68676	0.992075653	0.992075653	1.843012989
382903.9724	382903.9724	218722.2195	218722.2195	0.921320266	0.921320266	1.612900557
400485.1479	400485.1479	235963.7056	235963.7056	0.882697103	0.882697103	1.498141755
419892.9012	419892.9012	254564.4909	254564.4909	0.846027667	0.846027667	1.395485326
630557.4334	630557.4334	201922.8163	201922.8163	1.460623221	1.460623221	4.561182567
647684.0382	647684.0382	217840.0351	217840.0351	1.426012348	1.426012348	4.239833304
667196.8803	667196.8803	235012.1493	235012.1493	1.39184547	1.39184547	3.951433823
55326.61403	55326.61403	45143.45042	45143.45042	0.395479737	0.395479737	0.484689464
58944.80624	58944.80624	48702.02886	48702.02886	0.373377202	0.373377202	0.451904107
62895.34597	62895.34597	52541.37335	52541.37335	0.35372366	0.35372366	0.423429586
143137.9741	143137.9741	109178.1106	109178.1106	0.50978456	0.50978456	0.668353104
151988.7992	151988.7992	117784.4282	117784.4282	0.483554726	0.483554726	0.623978087
161684.9103	161684.9103	127069.258	127069.258	0.460022038	0.460022038	0.585339233

PACRatioNoAdmin	BillReducElec	BillReducGas	RIMCost	WeightedBenefits	WeightedElecAlloc	WeightedProgramCost
2.500552456	20425.47124	0	29727.19807	0.002348209	1	5376.289724
2.325086779	19892.49457	0	29548.73418	0.002355549	1	5393.096176
2.168113793	19373.42525	0	29425.33732	0.002369669	1	5425.424033
8.944000268	138669.8659	0	180794.0938	0.015942144	1	36499.98409
8.316392935	135051.4523	0	177925.0636	0.015991979	1	36614.08419
7.754930435	131527.4566	0	175299.2174	0.01608784	1	36833.56014
2.101137948	61287.21487	0	91034.76121	0.006903251	1	15805.18547
1.963621217	59688.00302	0	90742.0432	0.006959998	1	15935.10942
1.843012965	58130.52057	0	90649.95606	0.007047456	1	16135.34814
2.101137975	69206.0999	0	102797.309	0.007795216	1	17847.3642
1.963621243	67400.25482	0	102466.7691	0.007859295	1	17994.07554
1.843012989	65641.53098	0	102362.7834	0.007958054	1	18220.18699
1.612900557	694690.6974	0	1077594.67	0.077062854	1	176437.5627
1.498141755	678544.4696	0	1079029.618	0.077222296	1	176802.6092
1.395485326	662915.6347	0	1082808.536	0.077601067	1	177669.8156
4.561182567	1774028.689	0	2404586.122	0.201190488	1	460631.2567
4.239833304	1733268.416	0	2380952.454	0.201758144	1	461930.9207
3.951433823	1693840.003	0	2361036.883	0.202856824	1	464446.3787
0.484689464	45415.85596	0	100742.47	0.004779725	1	10943.31457
0.451904107	44394.46027	0	103339.2665	0.004807706	1	11007.37838
0.423429586	43407.6579	0	106303.0039	0.004859899	1	11126.8741
0.668353104	145022.9753	0	288160.9494	0.01593992	1	36494.89321
0.623978087	141238.7854	0	293227.5845	0.016054686	1	36757.65268
0.585339233	137553.3391	0	299238.2494	0.016247731	1	37199.63528

NetElecCO2	NetGasCO2	GrossElecCO2	GrossGasCO2	NetElecCO2Lifecycle	NetGasCO2Lifecycle	GrossElecCO2Lifecycle
3.121844762	0	3.286152381	0	44.14275826	0	46.46606132
2.987541374	0	3.144780394	0	42.94963222	0	45.21013917
2.85218314	0	3.002298043	0	41.69199277	0	43.88630818
21.19440915	0	22.30990437	0	299.6880854	0	315.4611425
20.28261463	0	21.35012067	0	291.5878743	0	306.9346046
19.36365869	0	20.38279862	0	283.0496775	0	297.947029
9.541670317	0	10.04386349	0	131.8175283	0	138.7552929
9.144913705	0	9.626224953	0	128.6387436	0	135.4092038
8.768045446	0	9.229521522	0	125.2957471	0	131.8902601
10.77454393	0	11.34162519	0	148.8495937	0	156.6837828
10.32652263	0	10.87002382	0	145.2600801	0	152.9053474
9.900959446	0	10.42206257	0	141.4851369	0	148.9317231
117.5127405	0	123.6976216	0	1432.463737	0	1507.856565
112.5079143	0	118.4293835	0	1393.132012	0	1466.454749
107.4759179	0	113.1325452	0	1351.637095	0	1422.775889
277.7689627	0	292.3883817	0	3801.672709	0	4001.760747
265.9388804	0	279.9356636	0	3701.462771	0	3896.276601
254.0445751	0	267.4153422	0	3595.732532	0	3784.981613
10.31188769	0	10.85461862	0	84.83509725	0	89.30010237
9.879382651	0	10.39935016	0	82.46372956	0	86.80392585
9.472825091	0	9.971394833	0	80.03817428	0	84.25070977
25.87985525	0	27.2419529	0	292.2173457	0	307.597206
24.79439271	0	26.09936075	0	284.5809565	0	299.5589016
23.77405084	0	25.02531667	0	276.5720239	0	291.1284462

GrossGasCO2Lifecycle	NetElecNOx	NetGasNOx	GrossElecNOx	GrossGasNOx	NetElecNOxLifecycle	NetGasNOxLifecycle
0	1.794048074	0	1.888471657	0	21.52857689	0
0	1.794048074	0	1.888471657	0	21.52857689	0
0	1.794048074	0	1.888471657	0	21.52857689	0
0	12.17991022	0	12.82095813	0	146.1589226	0
0	12.17991022	0	12.82095813	0	146.1589226	0
0	12.17991022	0	12.82095813	0	146.1589226	0
0	5.387247338	0	5.670786672	0	64.64696806	0
0	5.387247338	0	5.670786672	0	64.64696806	0
0	5.387247338	0	5.670786672	0	64.64696806	0
0	6.083330402	0	6.403505686	0	72.99996482	0
0	6.083330402	0	6.403505686	0	72.99996482	0
0	6.083330402	0	6.403505686	0	72.99996482	0
0	67.24751405	0	70.78685689	0	713.042594	0
0	67.24751405	0	70.78685689	0	713.042594	0
0	67.24751405	0	70.78685689	0	713.042594	0
0	158.955294	0	167.3213621	0	1867.271629	0
0	158.955294	0	167.3213621	0	1867.271629	0
0	158.955294	0	167.3213621	0	1867.271629	0
0	5.830439076	0	6.13730429	0	43.72829307	0
0	5.830439076	0	6.13730429	0	43.72829307	0
0	5.830439076	0	6.13730429	0	43.72829307	0
0	14.63271555	0	15.40285847	0	146.3271555	0
0	14.63271555	0	15.40285847	0	146.3271555	0
0	14.63271555	0	15.40285847	0	146.3271555	0

GrossElecNOxLifecycle	GrossGasNOxLifecycle	NetPM10	GrossPM10	NetPM10Lifecycle	GrossPM10Lifecycle
22.66165988	0	0.744977175	0.7841865	8.9397261	9.410238
22.66165988	0	0.744977175	0.7841865	8.9397261	9.410238
22.66165988	0	0.744977175	0.7841865	8.9397261	9.410238
153.8514975	0	5.057698976	5.323893659	60.69238771	63.88672391
153.8514975	0	5.057698976	5.323893659	60.69238771	63.88672391
153.8514975	0	5.057698976	5.323893659	60.69238771	63.88672391
68.04944006	0	2.231649879	2.349105136	26.77979855	28.18926163
68.04944006	0	2.231649879	2.349105136	26.77979855	28.18926163
68.04944006	0	2.231649879	2.349105136	26.77979855	28.18926163
76.84206823	0	2.520000049	2.652631631	30.24000059	31.83157957
76.84206823	0	2.520000049	2.652631631	30.24000059	31.83157957
76.84206823	0	2.520000049	2.652631631	30.24000059	31.83157957
750.5711516	0	27.88899693	29.35683887	295.7141687	311.2780723
750.5711516	0	27.88899693	29.35683887	295.7141687	311.2780723
750.5711516	0	27.88899693	29.35683887	295.7141687	311.2780723
1965.549084	0	65.92219459	69.39178378	774.3978864	815.1556699
1965.549084	0	65.92219459	69.39178378	774.3978864	815.1556699
1965.549084	0	65.92219459	69.39178378	774.3978864	815.1556699
46.02978218	0	2.420363491	2.547751043	18.15272618	19.10813283
46.02978218	0	2.420363491	2.547751043	18.15272618	19.10813283
46.02978218	0	2.420363491	2.547751043	18.15272618	19.10813283
154.0285847	0	6.074412241	6.394118148	60.74412241	63.94118148
154.0285847	0	6.074412241	6.394118148	60.74412241	63.94118148
154.0285847	0	6.074412241	6.394118148	60.74412241	63.94118148

IncentiveToOthers	DILaborCost	DIMaterialCost	EndUserRebate	RebatesandIncents	GrossMeasureCost	ExcessIncentives
0	0	0	5296.333321	5296.333321	5296.333321	0
0	0	0	5296.333321	5296.333321	5296.333321	0
0	0	0	5296.333321	5296.333321	5296.333321	0
0	0	0	10052.85656	10052.85656	10052.85656	0
0	0	0	10052.85656	10052.85656	10052.85656	0
0	0	0	10052.85656	10052.85656	10052.85656	0
0	0	0	18529.92428	18529.92428	18529.92428	0
0	0	0	18529.92428	18529.92428	18529.92428	0
0	0	0	18529.92428	18529.92428	18529.92428	0
0	0	0	20924.16463	20924.16463	20924.16463	0
0	0	0	20924.16463	20924.16463	20924.16463	0
0	0	0	20924.16463	20924.16463	20924.16463	0
0	0	0	269471.0238	269471.0238	269471.0238	0
0	0	0	269471.0238	269471.0238	269471.0238	0
0	0	0	269471.0238	269471.0238	269471.0238	0
0	0	0	248773.7558	248773.7558	248773.7558	0
0	0	0	248773.7558	248773.7558	248773.7558	0
0	0	0	248773.7558	248773.7558	248773.7558	0
0	0	0	55617.81437	55617.81437	55617.81437	0
0	0	0	55617.81437	55617.81437	55617.81437	0
0	0	0	55618.03855	55618.03855	55618.03855	0
0	0	0	134510.0526	134510.0526	134510.0526	0
0	0	0	134510.0526	134510.0526	134510.0526	0
0	0	0	134510.0526	134510.0526	134510.0526	0



RebatesandIncentsPV	GrossMeasCostPV	ExcessIncentivesPV	MarkEffectPlusExcessIncPV	GrossParticipantCostPV
4298.888107	4298.888107	0	0	0
4637.761861	4637.761861	0	0	0
5003.352035	5003.352035	0	0	0
8159.627216	8159.627216	0	0	0
8802.836213	8802.836213	0	0	0
9496.755074	9496.755074	0	0	0
15040.22996	15040.22996	0	0	0
16225.82471	16225.82471	0	0	0
17504.89041	17504.89041	0	0	0
16983.56902	16983.56902	0	0	0
18322.35376	18322.35376	0	0	0
19766.68676	19766.68676	0	0	0
218722.2195	218722.2195	0	0	0
235963.7056	235963.7056	0	0	0
254564.4909	254564.4909	0	0	0
201922.8163	201922.8163	0	0	0
217840.0351	217840.0351	0	0	0
235012.1493	235012.1493	0	0	0
45143.45042	45143.45042	0	0	0
48702.02886	48702.02886	0	0	0
52541.37335	52541.37335	0	0	0
109178.1106	109178.1106	0	0	0
117784.4282	117784.4282	0	0	0
127069.258	127069.258	0	0	0



GrossParticipantCostAdjustedPV	NetParticipantCostPV	NetParticipantCostAdjustedPV	WtdAdminCostsOverheadAndGA
0	0	0	1075.256536
0	0	0	1078.617822
0	0	0	1085.083385
0	0	0	7299.987252
0	0	0	7322.807244
0	0	0	7366.702376
0	0	0	3161.032953
0	0	0	3187.017707
0	0	0	3227.065399
0	0	0	3569.468163
0	0	0	3598.810393
0	0	0	3644.032623
0	0	0	35287.46631
0	0	0	35360.47551
0	0	0	35533.91657
0	0	0	92126.13063
0	0	0	92386.06308
0	0	0	92889.15403
0	0	0	2188.660045
0	0	0	2201.472791
0	0	0	2225.371905
0	0	0	7298.969078
0	0	0	7351.520903
0	0	0	7439.917308

WtdAdminCostsOther	WtdMarketingOutreach	WtdDIActivity	WtdDIInstallation	WtdDIHardwareAndMaterials
0	645.1539215	3532.675797	0	0
0	647.1706931	3543.719054	0	0
0	651.0500309	3564.961183	0	0
0	4379.992351	23983.56804	0	0
0	4393.684346	24058.54143	0	0
0	4420.021426	24202.75564	0	0
0	1896.619772	10385.3399	0	0
0	1912.210624	10470.71089	0	0
0	1936.239239	10602.28462	0	0
0	2141.680898	11727.22357	0	0
0	2159.286236	11823.62529	0	0
0	2186.419574	11972.19958	0	0
0	21172.47978	115934.3599	0	0
0	21216.28531	116174.2262	0	0
0	21320.34994	116744.0539	0	0
0	55275.67838	302673.5863	0	0
0	55431.63785	303527.5752	0	0
0	55733.49242	305180.4433	0	0
0	1313.196027	7190.680654	0	0
0	1320.883675	7232.775982	0	0
0	1335.223143	7311.294751	0	0
0	4379.381447	23980.2229	0	0
0	4410.912542	24152.87803	0	0
0	4463.950385	24443.29788	0	0

WtdDIRbateAndInspection	WtdEMV	WtdUserInputIncentive	WtdCostsRecoveredFromOtherSources	ProgramCosts
0	123.2034694	0	0	5376.289724
0	123.5886074	0	0	5393.096176
0	124.329435	0	0	5425.424033
0	836.4364467	0	0	36499.98409
0	839.0511736	0	0	36614.08419
0	844.0807014	0	0	36833.56014
0	362.1928477	0	0	15805.18547
0	365.1701948	0	0	15935.10942
0	369.7588807	0	0	16135.34814
0	408.9915727	0	0	17847.3642
0	412.3536211	0	0	17994.07554
0	417.5352084	0	0	18220.18699
0	4043.256778	0	0	176437.5627
0	4051.622211	0	0	176802.6092
0	4071.49518	0	0	177669.8156
0	10555.86136	0	0	460631.2567
0	10585.64456	0	0	461930.9207
0	10643.28899	0	0	464446.3787
0	250.7778395	0	0	10943.31457
0	252.2459308	0	0	11007.37838
0	254.984304	0	0	11126.8741
0	836.3197839	0	0	36494.89321
0	842.3412	0	0	36757.65268
0	852.4697074	0	0	37199.63528

TotalExpenditures	DiscountedSavingsGrosskWh	DiscountedSavingsNetkWh	DiscountedSavingsGrossThm
10672.62304	82789.21752	78649.75665	0
10689.4295	89315.34527	84849.57801	0
10721.75735	96355.98549	91538.18621	0
46552.84065	562061.4359	533958.3641	0
46666.94076	606367.7459	576049.3586	0
46886.4167	654167.1148	621458.7591	0
34335.10975	248411.4322	235990.8606	0
34465.03369	267993.2665	254593.6032	0
34665.27241	289118.9103	274662.9648	0
38771.52884	280508.5274	266483.101	0
38918.24018	302620.519	287489.4931	0
39144.35162	326475.7948	310152.0051	0
445908.5865	2874905.22	2731159.959	0
446273.633	3101528.92	2946452.474	0
447140.8394	3346019.373	3178718.404	0
709405.0125	7258955.155	6896007.398	0
710704.6764	7831165.765	7439607.477	0
713220.1345	8448488.807	8026064.367	0
66561.12893	194729.923	184993.4268	0
66625.19274	210080.1388	199576.1318	0
66744.91265	226640.5481	215308.5207	0
171004.9458	600080.5599	570076.5319	0
171267.7053	647383.8502	615014.6577	0
171709.6879	698416.478	663495.6541	0

DiscountedSavingsNetThm	TRCLifecycleNetBen	PACLifecycleNetBen	LevBenElec	LevBenGas	LevTRCCost
0	1447.868384	1447.868384	0.136676777	0	0.118267713
0	1126.959173	1126.959173	0.127086063	0	0.113804215
0	795.9244885	795.9244885	0.118506134	0	0.109811134
0	30855.48009	30855.48009	0.136676777	0	0.078890473
0	30334.23355	30334.23355	0.127086063	0	0.074426975
0	29874.91418	29874.91418	0.118506134	0	0.070433895
0	1854.051575	1854.051575	0.133910262	0	0.126053807
0	807.3335006	807.3335006	0.12514601	0	0.121974943
0	-257.6955221	-257.6955221	0.117459374	0	0.118397599
0	2093.612709	2093.612709	0.133910262	0	0.126053806
0	911.6488243	911.6488243	0.12514601	0	0.121974942
0	-290.9919539	-290.9919539	0.117459374	0	0.118397598
0	-30126.7827	-30126.7827	0.129167531	0	0.140198296
0	-46978.06787	-46978.06787	0.119977187	0	0.135921129
0	-64651.88967	-64651.88967	0.11175605	0	0.132095029
0	290449.3959	290449.3959	0.133556532	0	0.091438045
0	275921.3976	275921.3976	0.124147065	0	0.087058899
0	261438.0754	261438.0754	0.115702406	0	0.083128773
0	-33446.05924	-33446.05924	0.118277472	0	0.299073405
0	-36936.15939	-36936.15939	0.110276949	0	0.295349979
0	-40647.774	-40647.774	0.103328804	0	0.29211731
0	-70168.445	-70168.445	0.127999532	0	0.25108554
0	-78493.89701	-78493.89701	0.119501058	0	0.247130369
0	-87306.28831	-87306.28831	0.112101144	0	0.243686465

LevTRCCostNoAdmin	LevPACCost	LevPACCostNoAdmin	LevRIMCost	LevNetBenTRCElec	LevNetBenTRCElecNoAdmin
0.054658632	0.118267713	0.054658632	0.377969358	0.018409064	0.082018145
0.054658632	0.113804215	0.054658632	0.348248452	0.013281848	0.072427431
0.054658632	0.109811134	0.054658632	0.321454232	0.008695	0.063847502
0.015281392	0.078890473	0.015281392	0.338592119	0.057786304	0.121395384
0.015281392	0.074426975	0.015281392	0.308871212	0.052659087	0.11180467
0.015281392	0.070433895	0.015281392	0.282076992	0.048072239	0.103224742
0.063732256	0.126053807	0.063732256	0.385755452	0.007856455	0.070178006
0.063732256	0.121974943	0.063732256	0.35641918	0.003171067	0.061413754
0.063732256	0.118397599	0.063732256	0.330040696	-0.000938224	0.053727118
0.063732255	0.126053806	0.063732255	0.385755452	0.007856456	0.070178006
0.063732255	0.121974942	0.063732255	0.356419179	0.003171068	0.061413755
0.063732255	0.118397598	0.063732255	0.330040695	-0.000938224	0.053727119
0.080084002	0.140198296	0.080084002	0.394555678	-0.011030765	0.049083529
0.080084002	0.135921129	0.080084002	0.366213142	-0.015943942	0.039893185
0.080084002	0.132095029	0.080084002	0.340643114	-0.02033898	0.031672048
0.029281119	0.091438045	0.029281119	0.348692509	0.042118487	0.104275412
0.029281119	0.087058899	0.029281119	0.320037376	0.037088166	0.094865946
0.029281119	0.083128773	0.029281119	0.294171187	0.032573633	0.086421286
0.244027321	0.299073405	0.244027321	0.544573241	-0.180795933	-0.12574985
0.244027321	0.295349979	0.244027321	0.517793714	-0.18507303	-0.133750373
0.244028305	0.29211731	0.244028305	0.493724092	-0.188788506	-0.140699501
0.191514831	0.25108554	0.191514831	0.505477657	-0.123086009	-0.063515299
0.191514831	0.247130369	0.191514831	0.476781457	-0.127629311	-0.072013773
0.191514831	0.243686465	0.191514831	0.451002576	-0.131585321	-0.079413687

LevNetBenPACElec	LevNetBenPACElecNoAdmin	LevNetBenTRCGas	LevNetBenTRCGasNoAdmin	LevNetBenPACGas
0.018409064	0.082018145	0	0	0
0.013281848	0.072427431	0	0	0
0.008695	0.063847502	0	0	0
0.057786304	0.121395384	0	0	0
0.052659087	0.11180467	0	0	0
0.048072239	0.103224742	0	0	0
0.007856455	0.070178006	0	0	0
0.003171067	0.061413754	0	0	0
-0.000938224	0.053727118	0	0	0
0.007856456	0.070178006	0	0	0
0.003171068	0.061413755	0	0	0
-0.000938224	0.053727119	0	0	0
-0.011030765	0.049083529	0	0	0
-0.015943942	0.039893185	0	0	0
-0.02033898	0.031672048	0	0	0
0.042118487	0.104275412	0	0	0
0.037088166	0.094865946	0	0	0
0.032573633	0.086421286	0	0	0
-0.180795933	-0.12574985	0	0	0
-0.18507303	-0.133750373	0	0	0
-0.188788506	-0.140699501	0	0	0
-0.123086009	-0.063515299	0	0	0
-0.127629311	-0.072013773	0	0	0
-0.131585321	-0.079413687	0	0	0

LevNetBenPACGasNoAdmin	LevNetBenRIMElec	LevNetBenRIMGas
0	-0.241292582	0
0	-0.221162389	0
0	-0.202948098	0
0	-0.201915342	0
0	-0.181785149	0
0	-0.163570858	0
0	-0.251845191	0
0	-0.231273169	0
0	-0.212581322	0
0	-0.25184519	0
0	-0.231273169	0
0	-0.212581321	0
0	-0.265388147	0
0	-0.246235955	0
0	-0.228887064	0
0	-0.215135978	0
0	-0.19589031	0
0	-0.178468781	0
0	-0.426295769	0
0	-0.407516765	0
0	-0.390395288	0
0	-0.377478125	0
0	-0.357280399	0
0	-0.338901432	0



**APPENDIX B: CLEANPOWERSEF CCA**  
**MAXIMUM FUNDING**  
**(PUBLIC VERSION)**

**Electric kWh by Rate Class (2021 Forecast)**

Rate Class	Current Public Purpose Programs Charge (PPPC)	Load Forecast Annual kWh	PPPC \$
A1	\$ 0.01607		
A10	\$ 0.01492		
A6	\$ 0.01481		
AG	\$ 0.01657		
E19P	\$ 0.01400		
E19S	\$ 0.01453		
E20P	\$ 0.01365		
E20S	\$ 0.01421		
LS	\$ 0.00540		
Res	\$ 0.01575		
Annual PPPC Total			
<b>Max Funding Available (Annual)</b>			<b>\$ 1,526,352.98</b>

Program Funding Category	Budget Excluded	Budget Included
Statewide	\$ 41,081,749.62	\$ -
Regional	\$ 172,441,305.38	\$ -
Other	\$ -	\$ 7,444,580.48
<b>Subtotal by Category</b>	<b>\$ 213,523,055.00</b>	<b>\$ 7,444,580.48</b>
<b>Total PG&amp;E 2021 Program Budget</b>	<b>\$ 220,967,635.48</b>	

  

Program Funding Category	Percent Excluded	Percent Included
% Included for Elect to Administer		3.37%
% Regional	78.04%	
% Statewide	18.59%	
% Excluded for Elect to Administer	96.63%	
<b>Annual PPPC \$ Excluded</b>	<b>\$ 43,778,363.69</b>	<b>\$ 1,526,352.98</b>

## PG&E 2021 Programs and Budgets

CCA Funding Category	Statewide / Regional	PrgID	Program Name	Primary Sector	Budget
Excluded	Regional	PGE21002	Residential Energy Efficiency	Residential	954,278.84
Excluded	Regional	PGE21005	Residential New Construction	Residential	3,941,698.32
Excluded	Regional	PGE21007	California New Homes Multifamily	Residential	2,515,017.90
Excluded	Regional	PGE21011	Commercial Calculated Incentives	Commercial	6,547,961.98
Excluded	Regional	PGE21012	Commercial Deemed Incentives	Commercial	4,144,663.70
Excluded	Regional	PGE21014	Commercial Energy Advisor	Commercial	1,357,312.10
Excluded	Regional	PGE210143	Hospitality Program	Commercial	3,024,456.33
Excluded	Regional	PGE21021	Industrial Calculated Incentives	Industrial	6,905,837.25
Excluded	Regional	PGE210210	Industrial Recommissioning Program	Industrial	1,487,408.83
Excluded	Regional	PGE210212	Compressed Air and Vacuum Optimization Program	Industrial	786,909.13
Excluded	Regional	PGE21022	Industrial Deemed Incentives	Industrial	249,263.58
Excluded	Regional	PGE21024	Industrial Energy Advisor	Industrial	286,941.74
Excluded	Regional	PGE21027	Heavy Industry Energy Efficiency Program	Industrial	2,730,551.52
Excluded	Regional	PGE21031	Agricultural Calculated Incentives	Agricultural	5,332,819.85
Excluded	Regional	PGE21032	Agricultural Deemed Incentives	Agricultural	2,505,448.57
Excluded	Regional	PGE21034	Agricultural Energy Advisor	Agricultural	278,772.76
Excluded	Regional	PGE21036	Industrial Refrigeration Performance Plus	Cross-Cutting	25,072.79
Excluded	Regional	PGE21053	Compliance Improvement	Cross-Cutting	5,533,010.69
Excluded	Regional	PGE21054	Reach Codes	Cross-Cutting	2,046,633.39
Excluded	Regional	PGE21055	Planning and Coordination	Cross-Cutting	741,468.35
Excluded	Regional	PGE21056	Code Readiness	Cross-Cutting	6,960,988.81
Excluded	Regional	PGE21062	Technology Assessments	Cross-Cutting	1,462,257.82
Excluded	Regional	PGE21063	Technology Introduction Support	Cross-Cutting	3,327,075.93
Excluded	Regional	PGE21071	Integrated Energy Education and Training	Cross-Cutting	7,258,905.57
Excluded	Regional	PGE21072	Connections	Cross-Cutting	620,112.09
Excluded	Regional	PGE21091	On-Bill Financing (excludes Loan Pool)	Cross-Cutting	1,163,932.94
Excluded	Regional	PGE210911	On-Bill Financing Alternative Pathway	Cross-Cutting	3,922,176.76
Excluded	Regional	PGE2110011	California Community Colleges	Public	1,221,073.08
Excluded	Regional	PGE2110012	University of California/California State University	Public	1,862,920.76
Excluded	Regional	PGE2110013	State of California	Public	618,999.51
Excluded	Regional	PGE2110014	Department of Corrections and Rehabilitation	Public	798,914.21
Included	Local	PGE2110051	Local Government Energy Action Resources (LGE)	Public	3,041,724.05
Excluded	Regional	PGE211025	Savings by Design (SBD)	Commercial	1,287,816.17
Excluded	Regional	PGE_3P_Com	New 3P Placeholder - Commercial	Commercial	14,301,882.74
Excluded	Regional	PGE_3P_Res	New 3P Placeholder - Residential	Residential	12,298,994.20
Excluded	Regional	PGE_Ag_001	Agriculture Energy Savings Action Plan	Agricultural	5,747,863.97
Excluded	Regional	PGE_Com_001	Grocery Comprehensive Retrofit and Commissioning	Commercial	919,474.59
Excluded	Regional	PGE_Com_002	Smart Labs	Commercial	732,472.94
Excluded	Regional	PGE_EMV	Evaluation Measurement and Verification	Cross-Cutting	9,518,705.42
Excluded	Regional	PGE_ESA	Energy Savings Assistance	Residential	-
Excluded	Regional	PGE_ESPI	Energy Savings Performance Index	Cross-Cutting	-
Excluded	Regional	PGE_Ind_001a	Industrial Strategic Energy Management - Food Processing	Industrial	3,904,794.74
Excluded	Regional	PGE_Ind_001b	Industrial Strategic Energy Management - Manufacturing	Industrial	4,729,375.81
Excluded	Regional	PGE_Ind_002	Business Energy Performance Program	Industrial	5,935,884.23
Excluded	Regional	PGE_Ind_003	Industrial Systems Optimization Program	Industrial	4,715,581.56
Excluded	Regional	PGE_LoanPool	Financing Loan Pool Addition	Cross-Cutting	-
Included	Local	PGE_Pub_001	Central Coast Leaders in Energy Action Program	Public	346,843.89
Included	Local	PGE_Pub_002	Marin Energy Watch Partnership	Public	278,310.80
Included	Local	PGE_Pub_003	Redwood Coast Energy Watch	Public	375,390.21
Included	Local	PGE_Pub_004	Central California Energy Watch	Public	801,965.02
Included	Local	PGE_Pub_005	San Mateo County Energy Watch Program	Public	449,256.94
Included	Local	PGE_Pub_006	Energy Access SF	Public	1,006,036.74

CCA Funding Category	Statewide / Regional	PrgID	Program Name	Primary Sector	Budget
Included	Local	PGE_Pub_007	Sierra Nevada Energy Watch	Public	747,981.10
Included	Local	PGE_Pub_008	Sonoma Public Energy	Public	397,071.73
Excluded	Regional	PGE_Pub_009	Government and K-12 Comprehensive Program	Public	3,231,802.87
Excluded	Regional	PGE_Pub_010	RAPIDS Wastewater Treatment Optimization Pro	Public	630,064.86
Excluded	Regional	PGE_Res_001a	Pay for Performance - Comfortable Home Rebate	Residential	3,472,921.50
Excluded	Regional	PGE_Res_001b	Pay for Performance - Home Intel	Residential	665,052.67
Excluded	Regional	PGE_Res_001c	Pay for Performance - Home Energy Rewards	Residential	756,157.67
Excluded	Regional	PGE_Res_001d	Pay for Performance - Home Energy Optimization	Residential	2,687,371.38
Excluded	Regional	PGE_Res_002a	Residential Energy Advisor - Home Energy Check	Residential	2,166,035.01
Excluded	Regional	PGE_Res_002b	Residential Energy Advisor - Marketplace	Residential	1,486,202.09
Excluded	Regional	PGE_Res_002c	Residential Energy Advisor - Home Energy Report	Residential	8,459,625.64
Excluded	Regional	PGE_Res_003	Multifamily Energy Savings Program	Residential	4,180,340.22
Excluded	Statewide	PGE_SW_CSA_App	State Appliance Standards Advocacy	Cross-Cutting	1,693,770.05
Excluded	Statewide	PGE_SW_CSA_App_PA	State Appliance Standards Advocacy PA Costs	Cross-Cutting	1,874,473.44
Excluded	Statewide	PGE_SW_CSA_Bldg	State Building Codes Advocacy	Cross-Cutting	2,735,279.98
Excluded	Statewide	PGE_SW_CSA_Bldg_PA	State Building Codes Advocacy PA Costs	Cross-Cutting	1,507,403.08
Excluded	Statewide	PGE_SW_CSA_Natl	National Codes & Standards Advocacy	Cross-Cutting	1,569,629.98
Excluded	Statewide	PGE_SW_CSA_Natl_PA	National Codes & Standards Advocacy PA Costs	Cross-Cutting	627,822.42
Excluded	Statewide	PGE_SW_ETP_Gas	Emerging Technologies Program, Gas	Cross-Cutting	882,000.00
Excluded	Statewide	PGE_SW_ETP_Gas_PA	Emerging Technologies Program, Gas - PGE Costs	Cross-Cutting	25,675.27
Excluded	Statewide	PGE_SW_FS	Food Service POS	Commercial	5,637,633.96
Excluded	Statewide	PGE_SW_FS_PA	Food Service POS - PGE Costs	Commercial	531,703.17
Excluded	Statewide	PGE_SW_HVAC_Up	Upstream HVAC (Comm and Res)	Commercial	4,715,919.89
Excluded	Statewide	PGE_SW_HVAC_Up_PA	Upstream HVAC (Comm and Res) - PGE Costs	Commercial	369,929.67
Excluded	Statewide	PGE_SW_IP_Gov	Institutional Partnerships: DGS and DoC	Public	190,000.00
Excluded	Statewide	PGE_SW_IP_Gov_PA	Institutional Partnerships: DGS and DoC - PGE Co	Public	66,917.21
Excluded	Statewide	PGE_SW_MCWH	Midstream Comm Water Heating	Commercial	5,968,544.96
Excluded	Statewide	PGE_SW_MCWH_PA	Midstream Comm Water Heating - PGE Costs	Commercial	498,064.13
Excluded	Statewide	PGE_SWMEO	Statewide Marketing Education and Outreach	Cross-Cutting	-
Excluded	Statewide	PGE_SW_NC_NonRes	New Construction Non-Residential	Commercial	912,000.00
Excluded	Statewide	PGE_SW_NC_NonRes_PA	New Construction Non-Residential - PGE Costs	Commercial	296,754.04
Excluded	Statewide	PGE_SW_NC_Res	New Construction Residential	Residential	2,413,152.00
Excluded	Statewide	PGE_SW_NC_Res_PA	New Construction Residential - PGE Costs	Residential	505,022.78
Excluded	Statewide	PGE_SW_PLA	Plug Load and Appliance	Residential	3,305,999.99
Excluded	Statewide	PGE_SW_PLA_PA	Plug Load and Appliance - PGE Costs	Residential	171,541.28
Excluded	Statewide	PGE_SW_UL	Lighting (Upstream)	Commercial	3,324,672.00
Excluded	Statewide	PGE_SW_UL_PA	Lighting (Upstream) - PGE Costs	Commercial	180,829.92
Excluded	Statewide	PGE_SW_WET_CC	WET Career Connections	Cross-Cutting	266,000.00
Excluded	Statewide	PGE_SW_WET_CC_PA	WET Career Connections - PGE Costs	Cross-Cutting	107,343.04
Excluded	Statewide	PGE_SW_WET_Work	WET Career and Workforce Readiness	Cross-Cutting	561,943.35
Excluded	Statewide	PGE_SW_WET_Work_PA	WET Career and Workforce Readiness - PGE Cost	Cross-Cutting	141,724.01

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Order Instituting Rulemaking Concerning  
Energy Efficiency Rolling Portfolios, Policies,  
Programs, Evaluation, and Related Issues.

R.13-11-005  
(Filed Nov. 14, 2013)

**DECLARATION OF MICHAEL A. HYAMS SEEKING CONFIDENTIAL TREATMENT OF  
CERTAIN DATA AND INFORMATION CONTAINED IN CLEANPOWERSF ADVICE  
LETTER 17-E ELECTION TO ADMINISTER ENERGY EFFICIENCY PROGRAM**

I, Michael A. Hyams declare and state:

1. I am the Director of CleanPowerSF. As such, I have responsibility and oversight of CleanPowerSF's energy procurement, policy, compliance, and reporting.
2. I have been authorized by Barbara Hale, Assistant General Manager for Power of the San Francisco Public Utilities Commission, to make this Declaration on behalf of CleanPowerSF.
3. I am making this Declaration in accordance with California Public Utilities Commission General Order (GO) 66-D, Decisions (D.) 06-06-066 and D.08-04-023, and the ESP Confidentiality Matrix accompanying those decisions, which governs the submission of confidential energy procurement and market-sensitive information to the Commission for Community Choice Aggregators.<sup>1</sup>
4. As demonstrated in the table below, the categories of information for which CleanPowerSF seeks confidential treatment are consistent with categories of information that are treated as confidential for energy service providers, and are reasonably tailored to address confidentiality concerns.

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<sup>1</sup> D.20-07-005, pp. 3-5.

5. The Commission has also determined that data that does not fall precisely within a matrix category but which “consists of information from which [Matrix category] information may be easily derived” is eligible for the confidential treatment specified in the corresponding matrix category.<sup>2</sup>
6. The table below is a matrix identifying the data for which CleanPowerSF is seeking confidential treatment.
7. The table specifies that the material CleanPowerSF is seeking to protect constitutes confidential, market-sensitive data covered by GO 66-D, D.06-06-066, and D.08-04-023.
8. The table also specifies the protected categories of information under which the data falls, and why confidential treatment is justified.
9. CleanPowerSF is complying with the limitations on confidentiality specified for the particular type of data, as listed in the table.
10. The data listed in the table is not already public, and cannot be aggregated, redacted, summarized, or otherwise protected in a way that allows partial disclosure.
11. I have personal knowledge of the facts and representations herein, except for those facts expressly stated to be based upon information and belief, and as to those matters, I believe them to be true.
12. Based on the foregoing, I make this declaration supporting the confidential treatment of certain data and information contained in CleanPowerSF Advice Letter 17-E Election to Administer Energy Efficiency Program (“CleanPowerSF AL 17-E”).

**Table – Confidentiality Matrix**

<b>Confidential Data</b>	<b>Category from GO 66-D, D.06-06-066, D.08-04-023 ESP Matrix</b>	<b>Justification for Confidential Treatment</b>	<b>Length of Time for Data to be Treated as Confidential</b>
CleanPowerSF AL 17-E, Appendix B CleanPowerSF CCA Maximum Funding:	ESP Matrix § III.C (LSE Total Energy Forecast (MWh))	The specified information is the same type of information that is in the listed ESP Matrix categories in that the information	For ESP Matrix III.C - Front three

<sup>2</sup> R.06-05-027, *Administrative Law Judge’s Ruling on San Diego Gas & Electric Company’s April 3, 2007 Motion to File Data Under Seal*, p. 2 (May 4, 2007).

<ul style="list-style-type: none"> <li>• “Load Forecast Annual kWh” column</li> <li>• “PPPC \$” column except for “Max Funding Available (Annual)” row</li> </ul> <p>(Confidential material highlighted in yellow in the confidential version and redacted in the public version.)</p>		<p>would reveal CleanPowerSF’s total energy forecast. This information should be protected as confidential, market-sensitive information, consistent with D.06-06-066 and D.08-04-023.</p> <p>Disclosure of such valuable, highly sensitive market information would enable any interested person to identify in detail CleanPowerSF’s energy forecast. Release of this information would place CleanPowerSF at a competitive disadvantage and materially compromise CleanPowerSF’s ability to negotiate and procure renewable energy contracts on terms reasonable for its ratepayers. The public interest served by disclosing this information is clearly outweighed by the public interest in withholding such information from disclosure, given the sensitivity of the information and the potential harm that would be caused by its disclosure.</p>	<p>years of forecast data confidential.</p>
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 12, 2021, at San Anselmo, California.

By:   
 MICHAEL A. HYAMS

Director, CleanPowerSF

San Francisco Public Utilities Commission,  
 Power Enterprise  
 525 Golden Gate Avenue, 7th Floor  
 San Francisco, CA. 94103  
 Phone: (415) 554-1590  
 Email: mhyams@sfgwater.org

**BEFORE THE BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Order Instituting Rulemaking Concerning  
Energy Efficiency Rolling Portfolios, Policies,  
Programs, Evaluation, and Related Issues.

**R.13-11-005**  
(Filed November 14, 2013)

**CERTIFICATE OF SERVICE**

I, Paula Fernandez, declare that I am an employee of the City and County of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action. My business address is City and County of San Francisco, Office of the City Attorney, 1 Dr. Carlton B. Goodlett Place, Room 234, San Francisco, CA 94102.

On **August 16, 2021**, I served 1) **CLEANPOWERSF ADVICE LETTER 17-E ELECTION TO ADMINISTER ENERGY EFFICIENCY PROGRAM**; and 2) **DECLARATION OF MICHAEL A. HYAMS SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND INFORMATION CONTAINED IN CLEANPOWERSF ADVICE LETTER 17-E ELECTION TO ADMINISTER ENERGY EFFICIENCY PROGRAM** via electronic mail on all parties in Proceeding No. **R.13-11-005**.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on **August 16, 2021** in San Francisco, California.

/s/ Paula Fernandez  
Paula Fernandez