



March 15, 2024

California Public Utilities Commission
Energy Division Tariff Unit
505 Van Ness Ave.
Fourth Floor
San Francisco, CA 94102-3298

BayREN Advice Letter 25-E
(CPUC # 941)

Tier Designation

This Advice Letter has a Tier 3 designation pursuant to Decision (D.) 23-06-055, Ordering Paragraphs (OP) 28 and 29.

Subject

BayREN Integrated Demand Side Management (IDSM) Advice Letter

I. Purpose

This advice letter is filed in compliance with OPs 28 and 29 of D.23-06-055, and in alignment with the December 28, 2023, Energy Division Guidance which allows portfolio administrators (PAs) to submit Tier 3 advice letters proposing IDSM frameworks or program processes. The proposals shall include activities related to ongoing load shifting that reduces peak consumption and is not event-based, as long as there is an energy efficiency component. The frameworks or programs are to be supported with a set aside of up to 2.5% or \$4 million, whichever is greater, in energy efficiency funding as an operational complement.

II. Background

BayREN is a collaboration of the Association of Bay Area Governments (ABAG) and the

nine Bay Area counties that administers energy savings programs throughout the region. In D.16-08-019, the California Public Utilities Commission (CPUC or Commission) provided guidance for Energy Efficiency (EE) Rolling Portfolio Business Plan (BP) filings and included consideration of the formation of new Regional Energy Networks (RENs). BayREN remains intent on delivering programs that meet CPUC criteria as indicated by D.12-11-015 in the formation and implementation of programs including: filling gaps that the investor-owned utilities (IOUs) are not serving; developing programs targeting hard-to-reach markets; and piloting new approaches to programs that have the potential to scale and offer innovative avenues to energy savings.

In D.14-10-046 the Commission authorized funding for EE programs until 2025. In 2015 the Commission issued D.15-10-028 approving the mechanics for EE rolling portfolio and outlining the business plan application process. This advice letter is informed by BayREN's experience as a Program Administrator (PA) since 2013. Decisions 15-10-028 and 18-05-041 provided the requirements of the Annual Budget Advice Letter (ABAL) and directed PAs to file ABALs. In D.19-05-019 the Commission directed the ABALs going forward to include the results of the Program Administrator Cost (PAC) and the Ratepayer Impact Measure (RIM) test and cost-effectiveness estimates.

In March 2022, BayREN filed a business plan application to continue already approved and performing programs and to start four new programs. This business plan was authorized by the CPUC in D.23-06-055.

A. Regulatory Requirements

The provision for IDSM was established in D.23-06-055, allowing proposals for IDSM programs through Tier 3 advice letters to be filed by March 15, 2024, for implementation within the 2024-2027 portfolio period.

The aim of the IDSM scope in the decision is to leverage BayREN's energy efficiency program delivery approach to deliver a comprehensive strategy, enabling customers to execute multi-DER projects and obtain incentives through a unified process.

Funds from non-energy efficiency sources utilized for this purpose must adhere to specified regulations and budgets from respective proceedings or decisions. SCE, PG&E, and SoCalGas have recently demonstrated success in integrated delivery, financial accounting, and savings attribution of multiple demand-side program offerings in the San Joaquin Valley

proceeding (R.15-03-010). Results of these collaborative efforts are documented in the IOUs' Quarterly Progress Report on San Joaquin Valley Pilot Projects.

Each PA has the choice, but not the obligation, to allocate up to 2.5 percent or \$4 million (whichever is greater) of its energy efficiency budget for the portfolio period, capped at \$15 million, for a pilot program aimed at continuous load shifting to reduce peak consumption. However, this funding should not be directed towards event-based demand response, as it may not lead to continuous or permanent load shifting.

To facilitate innovative approaches, the CPUC allows IDSM programs to be proposed through Tier 3 advice letters by March 15, 2024, for implementation during the 2024-2027 portfolio period. The funding is part of the total energy efficiency portfolio cap and cannot exceed it. PAs have the flexibility to reallocate funds within their portfolios to support IDSM purposes within CPUC guidelines.

IDSM programs may leverage multiple funding streams from various sources, provided there is an energy efficiency component. Incentives from non-energy efficiency sources may be offered within these programs.

The commission specifies that energy efficiency funds should not be used to subsidize the capital costs of technologies that do not contribute to efficiency, such as battery purchases or self-generation technology. Rather, these funds are intended to supplement operational costs. Electric panel upgrades are considered an eligible technology, consistent with existing policies on fuel substitution energy efficiency measures.

It is mandatory for PAs to document the utilization of these funds in their annual reports, as outlined in D.19-08-009 and D.23-04-035, in response to feedback from Cal Advocates.¹

B. Filing Requirements

This IDSM advice letter submitted by BayREN aligns with the relevant CPUC requirements identified in D.23-06-055, which requires that each PA's advice letter must encompass the following elements:

- Comprehensive disclosure regarding the utilization of non-energy efficiency funding
- Specification of measurement methodologies, including any strategies employed to

¹ D.23-06-055 Section 8.3 IDSM Integration

prevent double-counting of consumption impacts

- References to pertinent regulations and approved budgets from non-energy efficiency resource domains that will dictate the allocation of said funds
- Clear delineation of effective useful life, baselines, and other underlying assumptions

Additionally, BayREN’s IDSM advice letter adheres to supplemental guidance issued by the Commission on December 28, 2023.

III. Discussion

A. Goals and Frameworks

Describe the PA’s goals for its new multi-DER IDSM programs or framework.

- 1. What outcomes does the PA intend to achieve through its new IDSM programs?*

BayREN welcomes the new IDSM portfolios as a departure from previous recent approaches to IDSM. Complementing the 2023 energy efficiency business plan authorization (D.23-06-055), this advice letter outlines framework for multi-distributed energy resource (“multi-DER”) approaches focused on “ongoing or permanent load shifting or load reduction” rather than event-based DR. This strategy is intended to offer flexibility to design, pilot, and scale customer-focused solutions for BayREN participants which also prepare the service area for full decarbonization by 2045 or sooner. As federal, state, and local climate goals near their target dates, BayREN finds it imperative to demonstrate success in the proposed framework and programs. RENS successfully embarked on the responsibility of accessing EE funding a decade ago; however, a dire need exists for disadvantaged communities (DACs), hard-to-reach sectors and customers (HTR), and underserved customers to access multi-DER programs authorized in other proceedings that would undoubtedly be unlocked by the uniqueness and value contained in REN administration.

BayREN proposed two outcomes. The first is the creation of a long-term framework for IDSM integration into BayREN’s portfolio. That framework will focus on the ways that BayREN can use IDSM to better meet the REN objectives of filling gaps, piloting innovative programs, and serving hard-to-reach customers. The second outcome is to start integrating IDSM strategies into existing BayREN programs in order to test them and that inform the framework.

This advice letter proposes a framework that:

- Identifies the steps needed to scale new approaches to existing programs towards a wider portfolio strategy;
- Outlines a decision-making process for directing IDSM funds to existing sectors, market segments, and delivery methods; and
- Develops an understanding of the permanent load shifting (PLS) opportunities within the authorized portfolio

To inform the framework above, BayREN proposes IDSM activities beginning in CY2024 that:

- Leverage existing EE programs to build IDSM capacity for REN staff and implementers
- Serve HTR and underserved customers with funneled opportunities for DERs and dedicated efforts to enable operational measures for permanent load shifting alongside EE

BayREN acknowledges that the IDSM funds are not additive to the authorized budget and therefore will be used to augment ongoing activities with IDSM opportunities.

2. *What mechanisms will the PA have available to prioritize the DERs that are achieving the most successful outcomes from question 1?*

a) *What criteria will be used to determine if increased budget should go toward those measures in future portfolios?*

BayREN will determine if increased budget should go towards those measures based on where success is found to meet demand and improve customer satisfaction, improve customer outcomes, fill gaps in order to achieve portfolio equity and market support objectives of supporting the long-term success of the energy efficiency market by educating customers, training contractors, building partnerships, or moving beneficial technologies towards greater cost-effectiveness and adoption, as well as providing and improving access to energy efficiency for hard-to-reach, underserved customers, and disadvantaged communities.

3. *What metrics or indicators will be used to measure progress toward the outcomes and to determine whether the new programs are successful?*

a) *Provide details of the measurement approaches, including measurement methods used to disaggregate savings/impact results between energy efficiency and other resources.*

BayREN will track the number of local government properties (sites and buildings) and

residential properties (sites and units) leveraging technical assistance services to identify potential IDSM projects, the number of IDSM audits completed, and the number of referrals and project applications to other programs that support the installation of IDSM technologies. BayREN will explore ways to track successful adoption of IDSM technologies resulting from referrals.

- b) Does the PA have a way to compare energy savings, cost effectiveness, or other characteristics of the different DERs with each other? (For example, can a TSB facsimile be developed from DER avoided costs?)*

Although this is not applicable to BayREN's current plans for IDSM integration in its portfolio, BayREN looks forward to the opportunity to engage with stakeholders to develop a robust tracking and comparison methodology to use across DERs. The TSB framework lends itself well to valuing time-dependent avoided load and BayREN anticipates it can be expanded to value DERs as well as EE.

- 4. What baselines or assumptions will be used for the metrics or indicators?*

BayREN will invest two years of data collection to establish a baseline to best reflect the aforementioned metrics. For most of the proposed programs, the first two full years of data will be collected in PY2025 and 2026. This data will be used to establish a baseline for PY2027 and beyond. In the interim, BayREN intends to report relevant outcomes in its annual report.

- 5. What timeline will be used for developing and reporting on the metrics or indicators?*

For current programs (Residential Single Family (SF) and Multifamily (MF)), IDSM technologies will begin being integrated into program materials in 2024. For new programs (Public), the IDSM activities will begin being integrated into program materials in late 2024 to early 2025. Beginning with the 2024 Annual Report, the metrics and indicators mentioned above and any Market Support and Equity metrics and indicators that can be applied to DERs will be reported. The Annual Report will also include customer engagement and implementation of IDSM recommendations once those activities begin.

- a) Provide targets if possible. If not, describe how targets will be established.*

Targets will be established through an ongoing effort to create a long-term vision for IDSM integration. This vision will be reflected in a 2028-31 Business Plan that more widely

integrates IDSM strategies in BayREN's next portfolio approach. Initially, BayREN proposes that targets be established following program implementation and initial IDSM integration across all programs. Potential targets include:

- Awareness, Knowledge, Attitudes, and Behavior: Where program activities add to AKAB within targeted participants, such as multifamily technical assistance, public sector Integrated Energy Services energy concierge and Targeted Decarbonization Services demonstration projects, BayREN can set targets for participation and knowledge gains from participation.
- Advisory services provided: Through the residential and public sector concierge and advisory consulting services, participants will be given resources, opportunities, and plans for pairing DERs with their EE projects. BayREN will establish targets for uptake of these advisory services after establishing a baseline.
- Referrals to other programs: the residential MF and SF programs and public sector IES program will refer participants to DER programs as part of the concierge services and technical support offerings. Targets can be set for these referrals after a baseline is established.
- Applications completed: the residential and public sector programs may in some cases provide application support for programs providing incentives for IDSM from other PAs. The number and value of applications supported can be tracked and a target can be set after establishing a baseline.
- Funding leveraged to support IDSM: across programs, BayREN anticipates leveraging external funding (from other programs and potentially grants) that will help participants pay for IDSM. BayREN will make a good-faith effort to track funding that is applied for and captured as a result of program efforts.

6. *What concerns does the PA have regarding the new programs or framework?*

RENs are unique in terms of PAs where their purpose is to fill gaps left by IOUs and assist customers that may not be addressed wholly by IOUs. In terms of new frameworks, RENs need flexibility in use of funds to be able to holistically address energy efficiency, DR, and DER commitments to address equity and market support within the context of D.23-06-055. While the ED guidance states that only non-event-based DR shall be pursued in this advice letter, BayREN

notes that EE PAs are not prohibited from engaging in event-based or any other IDSM activities, with the exception of providing capital incentives to customers for non-EE investments.

B. D.23-06-055 Requirements:

Follow all requirements from D.23-06-055, as is expected, including but not limited to:

1. *Provide the scope of the multi-DER programs or framework proposed including the technologies and types of programs included.*

BayREN will expand its new and existing programs while engaging in the creation of a framework in 2024-2027 leading to a more robust IDSM strategy for the 2028-2031 portfolio plan filing. In addition to the mechanics of the framework described above, the following are anticipated program-level activities that will occur in the current business plan cycle

- Training programs
 - BayREN is not planning to offer IDSM-specific training programs but will continue to integrate IDSM into marketing, training, and educational materials within existing programs as appropriate.
- Incentive programs
 - BayREN will evaluate the opportunity to use its portfolio funding for IDSM incentives that support customers in achieving the outcomes of the Commission guidance.
- Technical assistance programs
 - BayREN plans to expand its existing residential programs (both SF and MF) beyond EE to include IDSM technical assistance and consulting/advisory and application support. Programs have already identified the desire for support with solar thermal, PV, EV charging, and battery storage, so those are anticipated to be the first technologies supported.
 - BayREN's new public sector Integrated Energy Services program is also planning to include IDSM technical assistance and consulting/advisory and application support for agencies that want to decarbonize. In addition to energy efficiency (including fuel substitution), the program is planning to support solar PV and thermal, battery storage, and EV charging by providing recommendations on technologies and phasing to best achieve decarbonization. The new public sector Targeted

Decarbonization program may provide similar types of assistance for agencies participating in the Decarbonization Showcase.

2. *Detail the approach to coordination with other DER proceedings including the rules of the non-energy efficiency **proceedings involved and any rules for exemptions or deviations from those proceedings if that is applicable.***

Not applicable to BayREN's current plans for IDSM integration in its portfolio; however, BayREN is party to and/or monitors numerous CPUC proceedings relevant to IDSM, including but not limited to the following, and is therefore well-positioned to coordinate as needed across other DER proceedings if and when applicable to its portfolio.

- Building Decarbonization (R.19-01-011)
- Microgrids and Resiliency (R.19-09-009)
- Self-Generation Incentive Program (SGIP) (R.20-05-012)
- High DER Future/Grid Modernization (R.21-06-017)
- Electric Demand Flexibility Rulemaking (R.22-07-005)
- DER Cost Effectiveness and Data (R.22-11-013)
- Transportation Electrification Policy and Infrastructure (R.23-12-008)

3. *Detail the funding requirements broken down and separated according to proceeding or other category such as energy efficiency, transportation electrification, customer generation, and so forth. Develop new methods if necessary to show stacking of costs and how those will draw from each funding source and through which procedural path.*

Not applicable to BayREN's current plans for IDSM integration in its portfolio; however, as mentioned in D.23-06-055, BayREN will include a list of external funding sources beyond the energy efficiency portfolio funding, if any, in its energy efficiency annual reports.

4. *Include Ex Ante assumptions if there are any for energy efficiency reporting such as project benefits, **measurement methods, baseline, and effective useful life.***

Not applicable.

5. *Include the Ex Post process: project benefits, measurement methods, list of applicable measurement protocols, project costs, and methodology.*

Not applicable.

6. *Include the project cost methodology.*

Not applicable because BayREN's programs will be providing information to participants and

referring them to applicable programs, which will use their own methodologies for project costs.

7. *Describe the reporting process and timing for each piece.*

As stated above, metrics related to the non-resource IDSM activities will be tracked and reported via BayREN’s Annual Report. The initial phase of market assessment, technical assistance, gap identification, and program planning is expected to last throughout the current business plan cycle (2024-2027).

C. C. Regarding Rules, Procedures, Requirements

D.23-06-055 says, “To be clear, this decision does not change any rules, budgets, or other policies for non-efficiency resources. Non-energy-efficiency funding used for this purpose will be required to abide by the rules and budgets set forth in their relevant proceedings or decisions.”

1. *Reference applicable rules from non-energy efficiency resource areas that will be used to govern the distribution of funds for non-EE measures.*

Not applicable to BayREN’s current plans for IDSM integration in its portfolio; however, BayREN will adhere to all applicable rules regarding energy efficiency and IDSM.

2. *Detail the use of non-energy efficiency funding. D.23-06-055 says, “The advice letters shall include details of the use of non-energy efficiency funding, measurement approaches including any methods that will be used to ensure that impacts on consumption are not double-counted, and references to applicable rules and approved budgets from non-energy efficiency resource areas that will govern the distribution of those funds.”*

Not applicable to BayREN’s current plans for IDSM integration in its portfolio because no other CPUC funding sources are available to be used and no savings are anticipated to be claimed; however, as mentioned in D.23-06-055, BayREN will include a list of external non-CPUC funding sources beyond the energy efficiency portfolio funding, if any, in its energy efficiency annual reports.

a) *How will IDSM be integrated into existing program plans? Which programs?*

IDSM opportunities will be evaluated for integration across the entire BayREN portfolio. Candidate programs for initial deployments include the following existing programs: BayREN02 (Multifamily), BayREN08 (Single Family); and new but already approved programs: BayREN11 (Public Sector Integrated Energy Services) and BayREN12 (Public Sector Targeted Decarbonization Services). The general activities include updating guidance for program

implementers to accommodate IDSM strategies if needed; directing implementers to incorporate IDSM analysis into marketing, education and outreach materials; defining how technical assistance incorporates IDSM engineering methods where applicable; identification of potential measure packages and technologies; and, updating of M&V and/or EM&V plans. The overall goal is to explore the value of incorporating IDSM activities and to determine if they should be continued or expanded in the next business plan filing.

*b) What is PA's plan for continuing or **updating IDSM efforts taken on via past decision?***

BayREN's portfolio did not include IDSM efforts prior to 2024.

*c) Provide context for the IDSM programs proposed per the 2023 decision by describing how they complement and/or integrate with **IDSM programs authorized by the 2018 decision or other avenues (or whether the programs are simply separate.)***

BayREN's portfolio did not include IDSM efforts prior to 2024.

d) Which types of IDSM will the PA implement and how?

IDSM will be implemented through the existing authorized programs and will follow the direction as mentioned in *D.23-06-055 Requirements*. In practice, IDSM deployment includes the evaluation of how DERs and demand flexibility unlock the potential of the efficient electrification of buildings. Strategies include the analysis of how solar and storage can be sequenced with EE measures to reduce building load, how the capital investments and operational costs impact customers, and how these loads can be orchestrated to provide electrical distribution system grid benefits leading to overall energy affordability. Programs will provide support to residential and public sector participants by providing technical assistance, referrals, and application support for external IDSM programs. The specific types of IDSM supported will depend on what BayREN learns from market engagement with residential and public sector participants, but initially the expectation is that the market is looking for assistance with solar PV and thermal, EV charging, and battery storage.

e) From where will money come and flow to (including between EE budgets and non-EE budgets)?

Not applicable to BayREN's current plans for IDSM integration in its portfolio; however, as mentioned in D.23-06-055, BayREN will include a list of external funding sources beyond the energy efficiency portfolio funding, if any, in its energy efficiency annual reports. Non-CPUC

funding such as grants may also be layered with EE IDSM funding.

f) Are there any limits on the amount of funding from non-energy efficiency sources, such as a maximum number of rebates.

Not applicable to REN PAs.

g) Are any protections or funding reservations needed for 3P procurements? Protections for CPUC, PA, Implementers?

Not applicable to REN PAs.

h) Balancing Accounts and Sub Accounts

Not applicable to RENs PAs. D.23-06-055 states, “The IOUs, in their Tier 3 advice letters, should include establishing balancing accounts with sub-accounts, or utilizing new sub-accounts within existing balancing account, if appropriate, for each non-energy efficiency funding source, to track the relevant costs to be recovered from non-energy efficiency sources. The balancing accounts would be reimbursed based on rebates and incentives from other programs and proceedings, based on the rules for those other resources.”

i) What is the timeframe for integrating IDSM and developing appropriate accounting structures?

Not applicable to REN PAs. BayREN will track IDSM activities and related costs using the IDSM subprograms already existing in CEDARS as follows:

- BAYREN02_IDSM - Multifamily IDSM - Equity
- BAYREN08_IDSM - Single Family IDSM - Equity
- BAY REN11_IDSM - Public Integrated Energy Services - Market Support
- BAYREN12_IDSM - Public Targeted Decarbonization Services - Market Support

D. D. Template/Table

Scope	Program or Framework	PA to Complete
	Technologies	To be determined depending on market engagement, solar PV and thermal, EV charging, and battery storage technologies are anticipated.
	Programs (or types)	Technical assistance including application support, marketing, education and outreach, workforce development across residential and public sectors and all applicable program offerings.

Approach to Coordination with other DER Proceedings	Proceeding(s) (one per cell)	General familiarization and monitoring of proceedings related to demand flexibility, data, transportation electrification, DER futures, and renewable/clean energy incentives.
	Relevant Rules for Implementation from Proceeding	BayREN will follow Commission orders not to use EE funding to rebate capital costs of non-EE technologies
	Rules for Exemptions or Deviations (if applicable)	None
	Funding requirements	None as BayREN proposes to utilize existing authorization of EE funds to offer services within the scope of this advice letter and leverage only non-CPUC funding for activities beyond the scope of this advice letter.
	Approach to draw from each funding source	Not applicable.
	New methods to show stacking of costs	BayREN will make good faith efforts to track customer incentives, rebates, and impacts resulting from program participation activities that result in energy and carbon reductions realized beyond energy efficiency, including but not limited to on-site generation, storage, and load shaping
	Reporting requirements (incl timing)	Metrics discussed above will be reported via Unique Value Metrics and Market Support/Equity Metrics and Indicators as applicable.
	Procedural Path for access to funding	Not applicable.
Consistency with EE	Ex Ante assumptions for energy efficiency reporting such as project benefits, measurement methods, baseline, and effective useful life	Not applicable.
	Ex Post process: project benefits, measurement methods, list of applicable measurement protocols, project costs, and methodology	Not applicable.

IV. List of Attachments

None.

V. Protest

Anyone may protest this Advice Letter. The Protest must state the grounds upon which it is based. The Protest must be made in writing and received by the Commission within 20 days of the date this Advice Letter was filed with the Commission, or April 4, 2024. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

CALIFORNIA PUBLIC UTILITIES COMMISSION
CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. It is also requested that a copy of the protest be sent by email to the address shown below on the same date it is mailed or delivered to the Commission.

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Counsel for:
ASSOCIATION OF BAY AREA GOVERNMENTS for the Bay
Area Regional Energy Network (BayREN) Program

VI. Effective Date

BayREN requests that this Tier 3 advice filing become effective on regular notice April 14, 2024, which is 30 calendar days from the date of this filing.

VII. Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to service lists for R.13-11-005 and A.22-02-005 and uploaded to the CPUC Energy Division Advice Letter database (cpucadviceletters.org). Address changes to the General Order 96-B service list should be directed to Casey Dailey at cdailey@wrcog.us or by calling (951) 405-6720. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.



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 proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

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

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

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

Name:
Title:
Utility Name:
Address:
City: State:
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	