**AESAP Implementation Plan**

Program Overview

Program Budget and Savings

1. Program Name: PG&E’s Agricultural Energy Savings Action Plan (AESAP)

2. Program ID number: PGE\_Ag\_001

3. Program Budget Table:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Category Description** | **2020 Program Budget ($)** | **2021 Program Budget ($)** | **2022 Program Budget ($)** | **2023 Program Budget ($)** | **2024 Program Budget ($)** | **2025 Program Budget ($)** | **Total Program Budget ($)** |
| Administrative Costs | $112,500 | $184,494 | $367,892 | $559,221 | $109,923 | $29,786 | **$1,363,815** |
| Marketing & Outreach Costs | $45,000 | $121,601 | $229,451 | $357,539 | $54,513 |  | **$808,104** |
| Direct Implementation: Incentives & Rebate Costs |  | $2,393,524 | $4,787,049 | $8,457,119 | $319,137 |  | **$15,956,829** |
| Direct Implementation: Non‐Incentive (DINI) Costs | $249,363 | $1,557,280 | $3,449,006 | $5,392,842 | $1,055,001 | $69,144 | **$11,772,636** |
| **Total**  **Implementation**  **Budget** | $406,863 | $4,256,899 | $8,833,398 | $14,766,720 | $1,538,573 | $98,930 | **$29,901,384** |
| **DINIand upside** | $0.00 | $688,208 | $1,451,315 | $2,213,148 |  |  | **$4,352,671** |
| **TOTAL BUDGET with SGAP, CEPP, KPIP, and upside** | $406,863 | $4,945,107 | $10,284,713 | $16,979,869 | $1,538,573 | $98,930 | **$34,254,055** |

IDSM Program Budget

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Category Description** | **2020 Program Budget ($)** | **2021 Program Budget ($)** | **2022 Program Budget ($)** | **2023 Program Budget ($)** | **2024 Program Budget ($)** | **2025 Program Budget ($)** | **Total Program Budget ($)** |
| Administrative Costs |  | $8,000 | $8,000 | $10,500 |  |  | **$26,500** |
| Marketing & Outreach Costs |  | $5,000 | $4,000 | $6,343 |  |  | **$15,343** |
| Direct Implementation: Incentives & Rebate Costs |  |  |  |  |  |  |  |
| Direct Implementation: Non‐Incentive (DINI) Costs |  | $18,062 | $38,155 | $62,500 |  |  | **$118,717** |
| **Total**  **Implementation**  **Budget** |  | $31,062 | $50,155 | $79,343 |  |  | **$160,560** |

**Total Support Services**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Category Description** | **2020 Program Budget ($)** | **2021 Program Budget ($)** | **2022 Program Budget ($)** | **2023 Program Budget ($)** | **2024 Program Budget ($)** | **2025 Program Budget ($)** | **Total Program Budget ($)** |
| **TOTAL NOT‐TO‐EXCEED BUDGET** | $406,863 | $4,976,169 | $10,334,868 | $17,059,212 | $1,538,573 | $98,930 | **$34,414,615** |

4. Program / Sub-program Gross Impacts Table:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **AESAP Goals** | **2020 Totals** | **2021 Totals** | **2022 Totals** | **2023 Totals** | **Total** |
| Gross Energy Savings (kWh) | 0 | 14,524,867 | 31,014,598 | 47,351,321 | **92,890,786** |
| Gross Energy Savings (Therms) | 0 | 81,389 | 124,583 | 183,077 | **389,049** |
| Gross Energy Savings (kW) | 0 | 1,579 | 3,371 | 5 ,147 | **10,096** |

5. Program Cost-Effectiveness (TRC): 2.30 No Admin. 1.26 With Admin

6. Program Cost-Effectiveness (PAC): 1.46

7. Type of Program Implementer: Third-party delivered

8. Market Sector: Agricultural

9. Program: Resource

10. Market channel(s) & Intervention Strategies, Campaign Goals, and Timeline.: Downstream / Incentive, Financing, Technical Assistance

Intervention Strategies are about understanding the customer’s obstacles, needs and motivations. AESAP incorporates several intervention strategies to address observed customer challenges while promoting cost-efficient savings attainment:

* Demographic/Geographic – We use business/ag data resources, including census surveys, to identify demographic characteristics and businesses in each targeted HTR community.
* Language Barriers – Program materials and communication avenues will be offered in a Spanish and Hmong to educate and recruit all eligible customers.
* Lack of desire to make investment in leased/rented facility – We work with farm bureaus and other entities to identify potential leased facility opportunity and host joint events in HTR communities to share information about the numerous benefits of energy efficient investment in leased facilities.
* Lack of resources to identify/plan/implement energy conservation measures – Multilingual educational materials, tutorials and informational videos and other resources will be available on the program website and through customer tools and calculators
* Access to capital markets/financing vehicles – Prospective agricultural customers are provided with information, guidance, and tools on how to use PG&E’s On-Bill Financing services to fund energy efficiency upgrades, as well as other financing options to facilitate participation

Campaign Goals and Timeline: In addition to financial goals (above) AESAP has campaign delivery goals outlined below:

| Phase | Deliverables | Dates/Duration |
| --- | --- | --- |
| Launch Readiness | * Kickoff Meeting; * Program Implementation Plan; * Program Management Plan; * Program Marketing Plan; * Develop Program Materials; * Setup IT Infrastructure; * Supply Chain Setup | 10/01/2020 - 12/31/2020  91 Days |
| Program Ramp Up | * Marketing Plan Implemented; * Pipeline Development; * Trade Ally Training; * Track and Report Program Metrics; * Supply Chain Setup | 01/01/2021 - 04/30/2021  119 Days |
| Program Steady State | * Energy Savings; * Materials Revision; * Trade Ally Training; * Supply Chain Management | 05/1/2021 - 05/31/2023  760 Days |
| Program Ramp Down / Transition | * Date Program is No Longer Available   for new Customers | 06/1/2023 - 12/31/2023  213 Days |
| Measurement & Payment | * Program Ramp-Down Plan;   Data /File Transfer | 01/01/2024 - 03/31/2025  455 Days |

Implementation Plan Narrative

1. Program Description:

The Agricultural Energy Savings Action Plan (AESAP or Program) provides end-to-end program implementation services, including marketing, outreach, engineering, operations, customer service, and data management and reporting, to agricultural electric and gas customers on qualifying rate schedules within PG&E’s service territory. The Program leverages the Implementer’s outreach staff, a team of subcontractors, and a network of trade professionals to provide customers with a single program that addresses all their energy efficiency needs.

The Program will be a critical part of PG&E’s efforts to achieve the goals established by the California Long-Term Energy Efficiency Strategic Plan. The program also contributes to PG&E’s efforts to comply with the requirements of the California Public Utility Commission’s (CPUC) Decision 16-08-019, which directed program administrators to transition to a majority of third-party designed and implemented programs.

Program objectives include:

1. Offers cost-effective and persistent energy savings to the agricultural segment throughout PG&E’s territory,
2. Provides a streamlined approach to calculating EE savings and processing incentives,
3. Implements strategic IDSM and DER solutions that drive a healthier grid,
4. Successfully engages hard-to-reach and underserved agricultural customers through data analysis of PG&E's existing market, and
5. Deploys marketing and outreach efforts educating customers and TAs on the value of energy efficiency and how to take advantage of low-cost or no-cost solutions.
6. Program Delivery and Customer Services:

Energy savings will be delivered through targeted offerings and strategic communication, direct customer outreach, and leveraging relationships with trade professionals and customers to increase the number of projects with current participants and to develop new business with non-participants.

AESAP incorporates six strategies specifically designed to achieve Program goals and objectives:

|  |  |  |
| --- | --- | --- |
| **Strategy** | **Description** | **Tactic** |
| Customer outreach via data analytics | Customizes program messaging to customer types and sizes | AMI data customer targeting using an omni-channel approach to customer acquisition (e.g., digital, social media, trade allies) |
| Customer access to energy data and analysis | Provides and analyzes usage data to inform energy management and energy savings opportunities | Share My Data |
| Technical assistance | Identifies and quantifies EE opportunities | Small growers need practical energy guidance. Large growers benefit from detailed energy and retro-commissioning (RCx) audits. |
| Process optimization | Directs customers to project-appropriate applications and savings platforms | New custom express calculation tools for repeatable measures accelerating program approval without sacrificing engineering quality and rigor.  Immediate onsite equipment optimization and installation (i.e., air compressor RCx) capturing stranded potential and existing “low hanging fruit”. |
| Flexible and scalable financial models | Meets customers’ specific payback thresholds and drives high-efficiency installations | Traditional incentives via deemed platform.  Flexible incentives via the custom and custom express platforms.  Financial mechanisms via PG&E (OBF traditional and non-incentive, OBR). |
| Ongoing training, monitoring, and education | Ensures long-term persistency in energy savings and ROI | Savings persistence monitoring.  Building/facility staff training incorporating strategic energy management (SEM) principles.  Strategic TA Relationships (STAR) training. |

Recognizing the importance of participation by Hard to Reach (HTR) and Disadvantaged Communities (DAC) customers, we intend to direct 70% of the program budget to marketing, outreach, and engineering services for this market segment. AESAP will utilize our offices and staff located in HTR regions to more directly interface with this customer base.



HTR/DAC customers face obstacles to participation in energy efficiency programs due to language barriers, access to capital markets and financing vehicles, lack of resources due to size to identify, plan and implement valuable conservation measures, and often the split incentive barrier resulting from the disincentive to make capital improvements to a rented facility. By their very nature, most agriculture customers tend to be HTR customers because of their rural locations and lessened exposure to EE/DSM programs and their benefits. Many agricultural operations are small so the owners operating the businesses are often overwhelmed with day-to-day tasks and unable to focus on energy efficiency benefits. Therefore, the Program must address and mitigates these obstacles to participation to ensure equal access to and participation in the energy efficiency program.

1. Program Design and Best Practices:

TRC and its partners have developed a multi-faceted approach to addressing each of the market barriers outlined in the Business Plan.

1. **Multiple Levels of Decision Making.** Getting to the correct staff early in the project timeline is critical to a project’s success. TRC will create an effective point of entry within the customer’s decision-making framework by leveraging existing relationships through program partners and trade professionals. Staff regularly interact and maintain relationships at decision-making levels creating an effective point of entry for program sales staff to propose energy efficiency solutions.

The program outreach strategy nurtures projects through the sales process, documenting program influence, and ensuring program integrity along the way. Identified project stakeholders are included in the customer journey through project tracking, program updates, and “before and after” project results. This strategy aims to acquire and retain decision-makers to maintain a low cost of customer acquisition and increase program cost-effectiveness.

1. **Misperception of EE Value.** The AESAP program design includes tools and program innovations to help accurately determine project savings before and after project implementation. Custom Express is an innovation which uses program approved tools, documentation, and savings methodologies to quickly and credibly calculate proposed project savings for common complex measures. Trade professionals can input project information into the Custom Express calculator to generate estimated savings, validated by Program staff before installation approval. Due to this standardized and vetted process, Custom Express brings an accelerated program experience to customers without sacrificing engineering quality and savings calculation rigor.

Even with decision-maker support of EE initiatives, customers face capital limitations that often stall or inhibit project implementation. To enable participation, program design integrates the “Efficiency-as-a-Service” (EaaS) financing model in addition to OBF. EaaS circumvents the capital approval hurdle by funding EE improvements from operating budgets and provides immediate positive cash flow. The financier retains ownership of installed efficiency assets and provides customers with a managed service tied to a pay-per-kWh saved billing model. Each kWh billed is contracted to be less than the utilities going kWh rate. This financing approach ensures customers achieve bill savings from the date of implementation until the measure is fully paid.

The AESAP program will promote non-energy benefits and greater transparency and control over customer energy usage. Reliance on energy cost savings alone ignores vital co-benefits associated with energy efficiency implementation such as carbon emission reductions, maintenance cost reductions, safety, and improved productivity, among other intangibles. The Program will quantify these co-benefits and integrate them into program support and marketing materials aimed to resonate with relevant project stakeholders. Non-energy benefits are also reinforced by our partners and trade professionals through marketing channels.

Energy savings measures can also be paired with fault detection instrumentation and software. As an example, in the Grocery subsector, fault detection is capable of alerting refrigeration technicians of faulty equipment or unstable temperature readings. Provided that the fault detection feature is well-managed, technicians and store owners will experience bountiful energy savings with the non-energy benefit of heightened preservation of their valuable merchandise.

1. **Program Complexities Diminish Value.** Customer-focused program staff continuously manage customer expectations through customer touchpoints and create a clear channel of communication as the customer progresses through their energy journey. Both trade professionals and outreach staff are trained to seamlessly document program influence through customer interaction, flag industry standard practice, and insulate program complexities from the customer experience.

A customized Energy Plan is developed for key accounts which directs customers through available program offerings, further reducing confusion caused by multiple options. The program follows an approach that focuses on “quick win”, low-cost, simple measures, such as retro-commissioning. As customer trust is gained, a collaborative road map is developed to identify and implement measures across the customer’s facility achieving deeper energy savings.

The program offers multi-lingual staff who can inform customers about program options and process in their native language. Program documentation is explained by program staff to minimize customer confusion for customers whose primary language is other than English.

1. **Contractors are often single end-use focused.** During the sales process, a single end-use focused contractor may recognize additional energy savings opportunities or a customer in need of a comprehensive energy assessment. Trade professionals are encouraged to notify program staff of these opportunities. The program partners will also look for comprehensive energy savings opportunities. The program will offer energy savings plans, which will encourage the adoption of multiple measures. Program staff, partners, trade professionals will all receive training, tools, and support to encourage identification of all EE opportunities, not just the single end-use they know/sell. Customers will be armed with program information and training to ask the right questions of the trade professionals.
2. Innovation:

Customer focus, innovation, and purpose are built into the AESAP Program. The AESAP Program is designed with these key needs in mind: enhanced customer experience, increased attainment of cost-effective energy efficiency savings, and integration of additional demand-side technologies. To this end, the AESAP Program incorporates several delivery strategy innovations to address observed customer challenges in this agricultural sector while promoting cost-efficient savings attainment. These innovative delivery strategies not only enhance the customer experience but also deliver real cost-efficiencies that are realized through increased participation or improved cost-effectiveness over traditional approaches:

1. **Flex Incentives**. A flexible incentive structure customizes incentive amounts to meet customers’ required investment criteria. Flex incentives also include a bonus structure to reward customers who meet specific participation criteria. Flex incentives are proposed across all agricultural segments and custom technologies.
2. **Efficiency-as-a-Service (EaaS).** Our program design integrates the “Efficiency-as-a-Service” financing model into an existing suite of financing options. EaaS circumvents the capital approval hurdle by funding EE improvements from operating budgets and provides immediate positive cash flow. Because the financier relies on savings for repayment, the innovation also supports the persistence of claimed savings. With favorable project economics, EaaS is scalable across customer sectors, segments, and technologies and can be extended to cover other DSM technologies that meet specified investment criteria.
3. **Data-Driven Targeting.** Our targeted outreach and marketing activities will eliminate customer confusion through tailored program messaging. By examining available agricultural customer and territory data, we will identify high-potential sectors, measure-specific applications, and stranded opportunities to ultimately reduce customer acquisition costs and improve customer engagement. This innovation is universally applicable across all customer classes to encourage participation and to drive deeper energy savings.
4. **Measure Graduation**. When planning EE upgrades, customers may only have a certain window of time to implement a project or purchase equipment. The traditional custom process is too arduous to accommodate expedited schedules, resulting in stranded opportunities. We will capture these projects by introducing simplified custom applications that accelerate the approval process. These Custom Express applications will rely, in part, on typical operating profiles and system configurations uncovered by data-mining historical project data. Trade Allies will primarily utilize the Custom Express approach to cost-effectively expand the proliferation of traditional custom measures beyond large customers and to enable data collection for full work paper development. Once enough data is accumulated, we will seek approval of the work paper and graduate the measure to the deemed platform. This innovation is proposed for all segments but will be applied only to measures that have reached the adequate market penetration criteria to warrant the Custom Express tool and work paper development effort.
5. **Data-Driven Program Management.** In this digital age, effective program management requires instant access to real-time, accurate information. By integrating Captures, our program management, tracking, and reporting system, into our program delivery model, we are providing an engine that will enable a suite of features such as continuous flex incentive budget management and data mining for targeted marketing initiatives.
6. **Savings Persistence Monitoring.** As customers consider EE upgrades, they are often concerned about maintaining incrementally complex equipment and ensuring that proposed investment criteria (i.e. energy savings) are realized. The persistence innovation is a multi-track, real-time M&V protocol that more accurately accounts for net savings over equipment life rather than one-and-done M&V plans focused on first-year savings. Persistence protocol maintains customer engagement for years after initial program participation: providing ongoing guidance and support for project performance, establishing PG&E and the TRC Team as trusted energy advisors, and offering numerous opportunities to promote repeat program participation. The innovation is scalable and is proposed across all sectors.
7. **Normalized Metered Energy Consumption (NMEC).** Complex EE project savings are often driven by several independent variables, making actual savings difficult for customers to decipher. To overcome this challenge, we will incorporate NMEC, a CA legislative (AB802) and CPUC approved method to quantify energy savings similar to IPMVP Option C, into our program delivery for savings at the building. We understand that SB 1131 extends NMEC to all end uses and we will work with PG&E and the CPUC as necessary to expand NMEC application in the agricultural sector according to SB 1131. With NMEC, savings are verified at the meter, visible to the customer, and well-aligned with utility bill reductions. NMEC savings receive existing conditions baseline per CPUC (E-4818 and others) and a net to gross (NTG) equal to 0.95 per CPUC proceedings. With these conditions and no requirement for M&V equipment, NMEC is a cost-effective M&V method that increases overall claimable savings for no net increase in implementation cost. NMEC methodologies also promote Strategic Energy Management (SEM) activities in the agricultural sector by monitoring long-term performance. NMEC is most applicable for customers who achieve a minimum of 10% meter savings, have predictable operating patterns, and who have an accessible metering platform.
8. **Metrics:**

The implementer will record all project data in their project and customer tracking system and track program performance by capturing the following Key Performance Indicators (KPIs):

Program Performance

* Savings to Goal (kWh, kW, therms)
* TRC Ratio
* Passed Inspections
* Data Quality
* Pipeline Quality

Financials/Savings

* Savings Claimed
* Budget Spent
* Savings/Budget Alignment

Customer Satisfaction

* Customer Satisfaction Survey Scores
* Complaints Received

Compliance

* Savings Forecast Accuracy
* Engineering Quality
* HTR/DAC Penetration

1. **For Programs claiming to-code savings:**

The AESAP will be claiming to-code savings and complying with Applicable Laws where appropriate. For instance, refrigerated warehouses will be an area where to-code savings potential resides. Often equipment is continually maintained and expected equipment turnover and replacement does not naturally occur. Offering to-code measures and accelerated replacement options will help fill this gap while screening projects for cost effectiveness. The Implementer will utilize an application process and a database to track and record savings and other customer data and information throughout the Program to understand issues with to-code potential such as, the reasons natural turnover is not happening within the to-code opportunities.

1. **Pilots:**

Pilot projects are not part of the AESAP.

1. Workforce Education and Training:

The program will engage PG&E’s Workforce Education & Training (WE&T) program where possible to help promote the creation of a valued, skilled workforce. The program team will encourage customers and Trade Professionals to consider providing job access to Disadvantaged Workers through the application process. The program team regularly works with local associations, training organizations, and colleges to support recruitment and training of a diverse industry workforce. Additionally, workforce education and training requirements will be incorporated into any program subcontract agreements.

1. Workforce Standards:

**HVAC.** The availability of competent hourly craft personnel possessing the requisite knowledge, skills, and abilities to perform the installation, modification, and maintenance of HVAC measures will support improved program outcomes over time as well as increase the number of qualified and appropriately trained tradesmen. Marketing of the Program leverages each successful project, competent and accredited installation technicians will help ensure these successes. Accurate installation, appropriate maintenance, and operational training ensure energy savings are realized.

We have the capability to comply with the HVAC Workforce Standards through our current Trade Ally application and training process and project application prerequisites. Relevant data is captured, stored, and reported. By proactively educating customers and Trade Allies on the Standards and requiring the Standards be included in the contracting documents when customers solicit bids for HVAC measure implementation, the program can enforce compliance.

Workforce standards to be incorporated into the program include ensuring HVAC installation technicians obtain one or more of the following: Completed an accredited HVAC apprenticeship , or are enrolled in an accredited HVAC apprenticeship; or have completed at least five years of work experience at the journey level as defined by the California Department of Industrial Relations (Title 8, Section 205 of the California Code of Regulations), passed a practical and written HVAC system installation competency test, and received credentialed training specific to the installation of the technology being installed; or hold a C-20 HVAC contractor license from the California Contractor’s State Licensing Board. These requirements apply to all the individuals that perform the installation, modification, and maintenance work, not to the contracting firm itself. As proof, only Qualified Documents issued through HVAC apprenticeship programs approved by the California Department of Industrial Relations, Division of Apprenticeship Standards, will be accepted.

Requiring a set of standards will help ensure installation technicians have the appropriate skill level to perform HVAC work at customer sites and with customer equipment. HVAC measures are generally a critical component of ongoing operations. Proper installation, modification, and maintenance of these systems ensure customer's operational continuity and program satisfaction.

Program staff will verify each installation technician has the proper credentials before any work being performed. All HVAC projects will be checked for compliance during our QC check prior to work beginning and incentives paid. We will retain all Qualified Documents following PG&E’s Document Retention policy provisions and will be available when requested for an audit by PG&E.

**Lighting.** The availability of competent hourly craft personnel possessing the requisite knowledge, skills, and abilities to install lighting control measures will support improved program outcomes over time as well as increase the number of qualified and appropriately trained tradesmen. Marketing of the Program leverages each successful project, competent and accredited installation technicians will help ensure these successes. Accurate installation, appropriate maintenance, and operational training ensure energy savings are realized.

TRC has the capability to comply with the Lighting Controls Workforce Standards through our current Trade Ally application and training process and project application prerequisites. Relevant data is captured, stored, and reported. By proactively educating customers and Trade Allies on the Standards and requiring the inclusion of the Standards in the contracting documents when customers solicit bids for lighting controls measure implementation, the program can enforce compliance.

Workforce standards to be incorporated into the program include ensuring lighting installation technicians possess certification from the California Advanced Lighting Controls Training Program (CALCTP) as either CALTCP Technical Installer or CALCTP Acceptance Test Technician. These requirements apply to all the individuals that perform the installation work, not to the contracting firm itself. As proof, only Qualified Documents issued by the California Advanced Lighting Controls Training Program (CALCTP) will be accepted.

Requiring a set of standards will help ensure installation technicians have the appropriate skill level to perform installation work at customer sites and with customer equipment. Lighting Control measures are an important component of ongoing operations. Proper installation of these measures ensures operational continuity and program satisfaction.

Program staff will verify each installation technician has the proper credentials before any work being performed. All Lighting Control projects will be checked for compliance during our QC check prior to work beginning and incentives paid. We will retain all Qualified Documents following PG&E’s Document Retention policy provisions and will be available when requested for an audit by PG&E.

1. Disadvantaged Worker Plan:

TRC will track Disadvantaged Worker participation where appropriate. TRC will do this by including questions on the Trade Ally application to allow for voluntary self-reporting. Periodic surveys of TAs via Survey Monkey will also ask for self-reporting of disadvantaged worked participation on specific AESAP projects. Customers performing their installations can also be asked to self-report Disadvantaged Worker details through project applications and surveys. Any information will be masked to remove any potential personally identifiable information and entered in Captures, our AESAP program management data system. Participation data can be reported on an ad-hoc basis or be provided as part of our regular reporting cycle.

TRC has a robust diversity and inclusion program for our staff as well as a supplier diversity program. The program team can encourage the trade allies to consider providing job access to Disadvantaged Workers through the application and training process. Our program teams regularly work with local associations, training organizations, and colleges to support recruitment and training of a diverse trade ally network.

TRC embraces the importance of the CPUC’s desire to promote a diverse workforce. In accordance with D.18-10-008 a Disadvantaged Worker is defined as an individual who meets at least one of the following criteria:

* Lives in a household where total income is below 50 percent of Area Median Income;
* Is a recipient of public assistance;
* Lacks a high school diploma or GED;
* Has a previous history of incarceration lasting one year or more following a conviction under the criminal justice system;
* Is a custodial single parent;
* Is chronically unemployed;
* Has been aged out or emancipated from the foster care system;
* Has limited English proficiency; or
* Lives in a high unemployment ZIP code that is in the top 25 percent of only the unemployment indicator of the CalEnviroScreen Tool.

For this program, we have not proposed any installation, modification, repair, or maintenance of EE equipment paid for through program funds. While we support job access for Disadvantaged Workers, the utilization of their employment is outside of the program activities.

We will report on Disadvantaged Workers within the TA network. Survey Monkey can be utilized to ensure that personal information is recorded anonymously. We will craft the survey such that the response is strictly voluntary. Any information will be masked to remove any potentially identifiable information and entered in Captures, our AESAP program management data system. Participation data can be reported on an ad-hoc basis or be provided as part of our regular reporting cycle.

1. **Additional Information:**

No additional information to provide.

Supporting Documents

**1. Program Manuals and Program Rules**

**2. Program Theory and Program Logic Model**

**3. Process Flow Chart**

**4. Incentive Tables, Workpapers, Software Tools**

**5. Quantitative Program Targets**

**6. Diagram of Program**

**7. Evaluation, Measurement & Verification (EM&V)**

**8. Normalized metered energy consumption (nMEC)**