

Peninsula Clean Energy Authority  
and  
Pacific Gas and Electric Company  
Joint Cooperation Memorandum for  
Program Years 2026-2027

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# Overview

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## Background and Purpose of Joint Cooperation Memo

This is the first Joint Cooperation Memo (JCM) between Peninsula Clean Energy Authority (PCE) and Pacific Gas and Electric Company (PG&E) and covers program years 2026-2027. PCE and PG&E (collectively the “Portfolio Administrators” or “PAs”) have committed to collaborating, coordinating, and ensuring the best service to shared customers. This JCM provides a summary of PCE’s FLEXmarket program and a summary of similar Energy Efficiency (EE) programs offered by PG&E<sup>1</sup>. The purpose of the 2026-2027 JCM is to provide a framework to avoid customer confusion and prevent double dipping of incentives. The JCM describes coordination for programs offered by the PAs and demonstrates how the PAs intend to minimize duplication of efforts for programs targeting common sectors and customers in their overlapping service areas.

The PCE and PG&E teams have collaboratively discussed program coordination for 2026-2027. This 2026-2027 JCM includes the following information:

1. Summaries of comparable PCE and PG&E commercial program offerings;
2. Coordination framework between programs; and
3. Customer Referral Tree.

## Regulatory Guidance

In Decision (D.) 18-05-041<sup>2</sup>, the Commission ordered PAs with overlapping service areas to develop JCMs to coordinate program activities to avoid duplication and customer confusion. D. 23-06-055 supersedes prior guidance with respect to the timing and submission of JCMs and requires biennial submission of updated JCMs within 60 days following Commission approval of the PAs’ True-Up Advice Letters (TUAL) and Mid-Cycle Advice Letters (MCAL).<sup>3</sup>

D. 24-04-007<sup>4</sup> further clarified that Community Choice Aggregators (CCAs) electing to administer EE programs are subject to the Commission’s JCM requirements where geography and programs overlap. Resolution E-5442, certifying PCE’s EE Program Administration Plan for

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<sup>1</sup> Full CEDARS 2026-2027 Budget filings, are linked here: [PG&E’s 2026 Filing Module](#) , and [PG&E’s 2027 Filing Module](#)

<sup>2</sup> <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M215/K706/215706139.PDF>

<sup>3</sup> <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M512/K907/512907396.PDF> , OP 35

<sup>4</sup> <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M529/K980/529980620.docx>

the FLEXmarket program, specifically directed PCE to engage in JCMs with PG&E and the Bay Area Regional Energy Network (BayREN).<sup>5</sup>

## Service Areas

PCE serves all of San Mateo County's 20 cities and unincorporated areas, as well as the City of Los Banos in Merced County. The entirety of PCE's service area overlaps with that of PG&E. Whereas PG&E administers a portfolio of EE programs, PCE just offers a single EE program within its service area.

## Commercial Sector Overlapping Programs

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PCE's FLEXmarket program, authorized under Resolution E-5442<sup>6</sup>, is limited to commercial customers. For that reason, this JCM identifies PG&E programs that service the commercial sector and therefore require coordination due to potential for overlap.

### PCE FLEXmarket Program (PCE01)

*Implementer: Peninsula Clean Energy*

PCE previously administered this program from May 2022 through May 2025. PCE FLEXmarket is a commercial-sector, performance-based EE program that pays aggregators for verified, meter-based energy savings and demand flexibility. Using a population-level Normalized Metered Energy Consumption (PopNMEC) framework, the program compensates participants based on actual grid value delivered rather than predetermined rebates for specific measures. FLEXmarket is measure-agnostic and allows qualified aggregators to design and implement customized solutions—such as heating, ventilation, and air-conditioning (HVAC), lighting, controls, refrigeration, and building envelope upgrades—tailored to customer needs. Savings are quantified using standardized, state approved PopNMEC methodologies and valued based on the avoided costs.

### PG&E High Tech & Bio Tech Efficiency Program (PGE\_Com\_004)

*Implementer: Resource Innovations*

The Advanced Energy Program is a customer-centric demand side management (DSM) program offering tailored solutions for high-tech and biotech (HTBT) customers.

The Program focuses on identifying and implementing energy efficiency opportunities in the unique HTBT sector, with facility types ranging from multi-site campus retrofits to laboratory,

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<sup>5</sup> <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M590/K666/590666633.PDF>

<sup>6</sup> <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M595/K978/595978272.PDF>

clean room, and data center upgrades. Additionally, the Program offers extensive guidance on control upgrades, and retro-commissioning (RCx) to optimize existing equipment, scheduling, and control sequences while shifting demand away from local and system peak periods.

The Advanced Energy Program targets medium-to-large high-tech and bio-tech facilities but is available to smaller customers in the sector as well. Typical projects have ranged from 10,000 sq. ft sized small offices to millions of sq. ft across high-tech and bio-tech campus facilities. Annual electric consumption from customer projects has ranged from several hundred thousand kWh to tens of millions of kWh. The Program has typically been a building controls-centric program with HVAC systems as its primary technology focus. This Program has primarily leveraged the customized incentive process but provides support for Deemed and NMEC projects, as well as assistance with PG&E's On-Bill Financing on an as-needed basis with customers.

## PG&E Healthcare Energy Fitness Initiative (PGE\_Com\_005)

*Implementer: Resource Innovations*

The Healthcare Energy Fitness Initiative (HEFI) is a customer-centric demand side management (DSM) program that offers tailored solutions for PG&E's healthcare customers including public or private inpatient (hospital), outpatient (clinics), and residential living care facilities. HEFI focuses on the highest potential efficiency opportunities that are common in the healthcare segment, including HVAC retrofits, controls, and optimization for central heating, cooling, and steam plants; lighting fixtures and advanced lighting controls; process and equipment loads, refrigeration, and plug loads.

The HEFI Program targets medical facilities primarily for medium and large customers but is available to smaller customers in the sector as well. Typical projects have ranged from small medical office building spaces with lighting upgrades to multi-year central plant replacement efforts. This is a building controls-centric program with HVAC systems as its primary technology focus. This Program has primarily leveraged the customized incentive process but provides support for Deemed and NMEC projects, as well as assistance with PG&E's On-Bill Financing on an as-needed basis with customers.

## Measured Savings for Summer Reliability (PGE\_Com\_006)

*Implementer: AESC*

The Measured Savings for Summer Reliability Program has the primary objective to reduce summer peak kW demand utilizing a meter-based approach with a strategic mix of measures and targeted load shapes to maximize Total System Benefit (TSB) delivery in the nonresidential space. The market-based program provides a customer and aggregator friendly platform – for primarily commercial office and retail customers of various sizes to leverage a full range of

customer-enabling behavioral and retrofit strategies to shift and reduce load. On-Bill financing is provided on an as-needed basis for customers, and customers are also encouraged to enroll and participate in demand response programs.

## Commercial Strategic Energy Management (PGE\_Com\_009)

*Implementer: Stillwater*

The Commercial Strategic Energy Management (SEM) program is a holistic, long-term, whole facility approach that uses advanced implementation, measurement and verification services and tools to determine energy savings from all program activities at the facility, including capital projects, maintenance and operation improvements, and retrocommissioning. Participants receive coaching to develop their own energy management practices that will persist beyond their engagement with the program. The Commercial SEM program serves commercial, public, and institutional customers, including but not limited to hospitality, grocery, retail, offices, hospitals, private higher education, schools, and municipal buildings. Target customer size is medium to large with a minimum annual usage of 1Gwh and/or 500,000 therms, with possible exceptions for customers under that threshold based on the total load of a given cohort.

## PG&E Simplified Savings Micro/Small Equity Program (PGE\_Com\_SmallBiz)

*Implementer: Resource Innovations*

Simplified Savings targets Micro and Small Businesses (MSB) within Disadvantaged Communities and/or Hard-to-Reach customers located in DAC areas or qualifying for HTR. The Program outreach is primarily undertaken by participating small contractors from the target area. Eligible customers must receive gas or electric service through a PG&E meter, have a demand of 50 kW or less, and not have more than 10 sites in their ownership group. Program offers energy efficiency training and audit, select direct install measures, as well as any active deemed measures in the current PG&E catalog. Trade Allies are recruited for work in their own communities, trained in the Direct Install and Add On Opportunity menu the program offers and provided with electronic site audit training and tools resulting in an immediate list of options for each customer location. It is intended that customers who participate in the education, training, and behavioral coaching they receive to be prompted to take further equipment and measure related steps for bill reduction.

Bill reduction and customer engagement are the primary measures of success. Energy savings will be tracked, but the focus of the program is to engage micro and small customers for the

primary goal of no cost equipment upgrades and behavioral changes which leads to further customer interest in energy use strategies.

## PG&E On-Bill Financing Offerings (PGE21091, PGE210911)

*Implementer: PG&E*

On-Bill Financing (OBF) is a key enabler of energy savings for nonresidential customers, providing zero-percent financing for qualifying EE retrofits. Loan payments appear as fixed monthly charges on the customer's PG&E bill. OBF helps customers, who do not have access to affordable capital, get over the first-cost hurdle to EE investment, unlocking broader and deeper cost savings while supporting PG&E's energy savings targets. Customers participating in programs may use OBF to support their project (loans are issued between \$5k- \$250k with incentives). OBF loans are also available for energy savings projects customers propose, whom are not participating in EE programs.

Eligible EE projects can receive this financing without participating in an incentive program. For more information about PG&E OBF Program, visit [www.pge.com/obf](http://www.pge.com/obf).

## PG&E Commercial Calculated Incentives Program (PGE21011)

PG&E implements the Commercial Calculated Incentives Program. The program provides financial incentives for non-residential customers to retrofit equipment or systems that exceed applicable code and/or industry standards in existing buildings. Its mission is to offer financial and technical assistance for customers to undertake retro-commissioning (RCx) projects and implement measures that improve facility operations. Largely these elements of service have been built into third-party programs which address most customer circumstances. In instances when third-party programs cannot support a customer, this program will remain open to aid in the development of customer-driven projects, or in instances of transitioning programs.

## PG&E Commercial Deemed Incentives Program (PGE21012)

The Commercial Deemed Incentives Program offers a limited number of prescriptive rebates directly to customers, vendors, or distributors for the installation or sale of energy efficient equipment. These measures reach across technology segments including agriculture, HVAC, refrigeration, and water heating, where there is no overlap with Statewide programs. While the program has been reduced in size due to the focus on third party programs, the prescriptive rebate approach continues to fill gaps in other programs and remains an attractive option for smaller projects.

Table 1 – PAs' Comparable Programs in PCE Territory

Program ID	Program Name	Sector	Segment	Measures										
				Lighting	Appliances	HVAC	Plug Load	Refrigeration	Custom	Lighting Controls	HVAC Controls	Whole Building	Water Heaters	Other
PCE01	Demand FLEXmarket	Commercial	Resource Acquisition	x	x	x	x	x	x	x	x	x	x	x
BayREN06	BayREN Business Program	Commercial	Resource Acquisition	x	x	x	x	x	x	x	x	x	x	x
PGE21011	Commercial Calculated Incentives	Commercial	Resource Acquisition	x	x	x		x	x	x	x	x		x
PGE21012	Commercial Deemed Incentives	Commercial	Resource Acquisition	x	x	x	x	x			x		x	x
PGE_Com_004	High Tech & Bio Tech Efficiency Program	Commercial	Resource Acquisition	x		x	x	x	x	x	x	x	x	x
PGE_Com_005	Healthcare Energy Fitness Initiative	Commercial	Resource Acquisition	x		x	x	x	x	x	x	x	x	x
PGE210911	On-Bill Financing Alternative Pathway	Financing	Market Support	x	x	x	x	x	x	x	x		x	x
PGE_Com_Small Biz	Simplified Savings	Comm Micro Small Biz <50kw	50/50 Market Support and Resource Acquisition	x		x	x	x	x	x	x		x	
PGE_Com_006	Measured Savings for Summer Reliability	Commercial	Resource Acquisition	x		x				x	x		x	x
PGE_Com_009	Commercial Strategic Energy Management	Commercial	Resource Acquisition	x	x	x	x	x		x	x	x	x	x

# Coordination Efforts between PCE and PG&E

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## General Program Coordination

The PAs will coordinate on a regular basis to update each other on program developments and discuss duplication and prevention of “double-dipping<sup>7</sup>” from incentives, rebates, or other EE program funding from the PAs. The PAs’ program managers will meet regularly to:

- Review program updates that may affect coordination or overlap;
- Identify and address data sharing needs;
- Discuss anticipated program changes prior to implementation to prevent customer overlap and confusion; and
- Review and refine double dipping screening procedures, as needed.

Responsibility for scheduling and managing coordination meetings will be shared between the PAs’ program staff.

## Program Referrals

The PAs will each designate primary points of contact to oversee their respective commercial programs and serve as central resources for coordination. These individuals will respond to inquiries from the other PA regarding commercial offerings and ensure consistent communication. The assigned contacts will also maintain familiarity with the other PA’s comparable programs (see Figure 1) and facilitate warm handoffs to the appropriate program representatives when necessary.

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<sup>7</sup> “Double dipping”, *Resource Savings Rulebook*, v 4.0, 10/2/2023, page 37 :

<https://www.pge.com/assets/pge/docs/about/doing-business-with-pge/PGE-Resource-Savings-Rulebook.pdf#:~:text=Double%20Dipping%20and%20Double%20Counting&text=CPU%20Requirement:%20Participants%20in%20meter%2Dbased%20programs%20are%20subject%20to%20the%20same%20double>

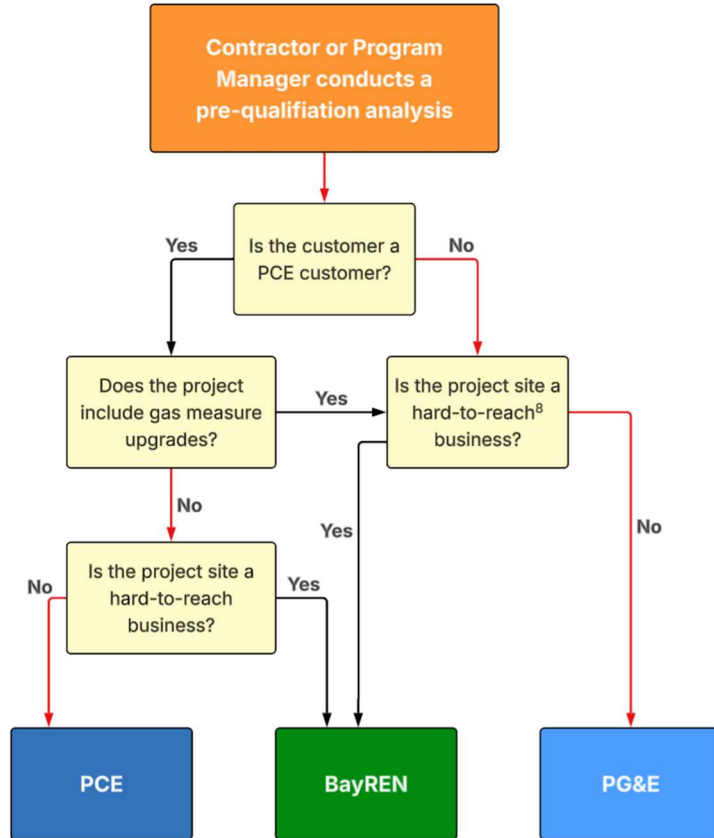


Figure 1 Customer Referral Tree

## Marketing

The PAs recognize the importance of coordinating marketing efforts to reduce potential customer confusion. Prior to program launch, PCE will distribute a marketing brief to PG&E outlining the FLEXmarket program’s key messaging and positioning. In addition, the PAs will collaborate during recurring coordination meetings to align on campaign strategies, customer-facing outreach materials, and implementation timelines.

## Data Sharing and Double Dipping Prevention

Data sharing is integral to effective coordination between the PAs and to ensure accurate reporting and savings claims. The PAs recognize the importance of safeguarding customer data and preventing duplicate incentive payments for the same intervention.

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<sup>8</sup> [EE-2024-Business-PortfolioPlan\\_Final-Dec\\_CPUC\\_20230629\\_D-23-06-055\\_757324.pdf](#) pg 52-54

To protect customer data, PCE and PG&E will mutually execute and maintain applicable Non-Disclosure Agreements (NDAs) governing the exchange of customer information for the purposes of administering energy efficiency programs.

Both PG&E and PCE have data governance and protection obligations for sharing any customer data. Before sharing data for double-dip check purposes or to support a program, both parties will ensure that the following data security and privacy protocols have been completed:

- PCE and PG&E have signed the PG&E-PCE Mutual NDA; and
- PCE has completed PG&E's Third-Party Security Review (TSR) and TSR renewals where applicable

#### *Data Sharing and Double-Dipping Prevention Procedures*

Accordingly, the PAs have established the following data sharing protocols and double-dipping prevention procedures. PCE and PG&E will transmit requested EE data directly to each other only and will not provide such data to the other PA's contractors. Should a PA's contractors need access to such data, then the PA receiving the data may pass on the data to its contractors consistent with applicable data security and confidentiality requirements.

1. Program managers will meet on a regular basis to review general updates to programs that may impact coordination and program overlap and check data sharing needs. PG&E and PCE programs staff will share the responsibility of scheduling and managing meetings.
2. Implementers or contractors serving PCE and PG&E programs are not allowed to "split" applications or scopes of work between the PAs. The contractor process to avoid double dipping is as follows:
  - a. Participating contractors in PCE and PG&E programs will be notified of policies pertaining to double dipping;
  - b. Multiple violations of double-dipping policies may disqualify a contractor from program participation.
3. Project enrollment forms require a field identifying the last utility incentive received, and the scope of work covered by the project;
4. PCE's FLEXmarket program may include interventions that are also covered under statewide upstream and midstream programs. PCE will notify the appropriate PG&E program managers of projects that incentivize interventions covered by statewide programs<sup>9</sup>.
5. PCE and PG&E will coordinate the programs they lead to ensure that incentives in those programs are only paid once for the same intervention. PCE will disclose to PG&E all identified instances where their customers participate in PCE's FLEXmarket program and

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<sup>9</sup> For details on Statewide Programs, please visit the appropriate PA's 2025 Annual Report: <https://cedars.cpuc.ca.gov/documents/standalone/list/>

obtain a PG&E On-Bill Financing (OBF) loan so that the project can be excluded from the PG&E claim.

- a. When projects enrolled in PCE's FLEXmarket program utilize PG&E OBF, PCE program managers will coordinate directly with the OBF program manager to ensure customer and project eligibility requirements are met and provide the project detail required by the OBF program to fund the loan.
6. PG&E and PCE will share with each other a quarterly data file identifying customers in PCE's service area who have received rebates or incentives from the providing PA's commercial programs over the last five years. The data will also include information about customers who have participated in the providing PA's meter-based programs, including the implementation date and program close date. The program close date represents the date when the customer becomes eligible to participate in another EE program.
7. If any PA discovers a potential or actual overlap, the affected projects will be evaluated at the intervention level. If a pattern of double dipping is identified, PCE and PG&E will work together to implement appropriate program modifications. If both PCE and PG&E have claimed the same project interventions, the parties will determine how the project will be attributed and will review cost recovery options with the program partner or entity that received duplicate funding. If a trend of double dipping is associated with a specific contractor or installer, corrective actions may be taken.
8. PG&E and the broader California PA team, conducted a statewide Program Overlap Study.<sup>10</sup> PG&E and PCE shall consider the results of the study and future recommendations, and continue improving established double dip prevention protocols.
9. PCE will provide PG&E with quarterly financial forecast updates. The financial forecast update is the financial payments PCE anticipates from PG&E for its EE program.

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<sup>10</sup> D.23-06-055, OP32 directed the PAs to "submit a joint Tier 2 advice letter to provide information on substantively similar programs". June 30, 2025 CPUC disposed of this AL, approving it.