September 4, 2019

CA Public Utilities Commission

Energy Division

Attention: Tariff Unit

505 Van Ness Avenue, 4th Floor

San Francisco, CA 94102-3298

**MCE Advice Letter XX-E**

**Re: Marin Clean Energy’s 2020 Energy Efficiency Annual Budget Advice Letter**

Pursuant to Decision (“D.”) 18-05-041, *Decision Addressing Energy Efficiency Business Plans,* Ordering Paragraphs (“OP”) 40 and 41, Marin Clean Energy (“MCE”) submits its Annual Budget Advice Letter (“ABAL”) for Program Year 2020 as MCE Advice Letter (“AL”) XX-E.[[1]](#footnote-1)

**Tier Designation:** This AL has a Tier 2 designation pursuant General Order (“G.O.”) 96-B, Energy Industry Rule 5.2 and D.18-05-041.

**Effective Date:** Pursuant to G.O. 96-B, MCE requests that this Tier 2 AL become effective on October 4, 2019, which is 30 calendar days from the date of this filing.

**Purpose**

The purpose of this advice filing is to request MCE’s energy efficiency budget for Program Year 2020. This AL complies with D.18-05-041, which requires MCE to file an ABAL by September 4, 2019. The ABAL provides information about MCE’s approved energy efficiency portfolio, including (1) cost effectiveness; (2) budgets; (3) energy savings; and (4) portfolio changes.

**Background**

MCE has administered energy efficiency funds under California Public Utilities Code (“Code”) Section 381.1(a)-(d) since 2013.[[2]](#footnote-2) The California Public Utilities Commission (“Commission”) originally restricted MCE’s energy efficiency programs to serving gaps in Investor Owned Utility (“IOU”) programs and hard to reach markets.[[3]](#footnote-3) At the time, the Commission acknowledged that these restrictions may cause MCE’s portfolio to fail the Total Resource Cost (“TRC”) test and thus did not initially impose a minimum cost effectiveness requirement on MCE.[[4]](#footnote-4) In 2014, however, the Commission lifted the restrictions and imposed the same cost effectiveness requirements on CCAs as IOUs.[[5]](#footnote-5)

Program Administrators (“PA”) were invited to submit business plans in 2017. On January 17, 2017, MCE filed a Business Plan with the Commission that requested authorization to expand MCE’s energy efficiency portfolio to include additional sectors and programmatic offerings.[[6]](#footnote-6) MCE proposed to offer programs in the following sectors: (1) Residential; (2) Commercial; (3) Industrial; (4) Agricultural; and (5) Workforce Education and Training. On June 5, 2018, the Commission approved MCE’s Business Plan.[[7]](#footnote-7)

**Cost Effectiveness**

Decision 18-05-041 provided guidance to Commission staff on how to evaluate PAs’ ABALs, which included guidance on portfolio cost effectiveness.[[8]](#footnote-8) For Program Years 2019-2022, PAs’ portfolios must meet a forecasted TRC at or above 1.0. For Program Years 2023-2025, PAs’ portfolios must meet a forecasted TRC at or above 1.25.

In the event a PA does not meet a TRC of 1.25 on a forecast basis for Program Years 2019-2022, ABALs must contain additional discussion about how the PA intends to meet or exceed a 1.0 TRC on an evaluated basis. MCE’s portfolio TRC and program administrator cost ratio (“PAC”) without market effects for 2020 are provided below.

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| **Portfolio TRC and PAC for 2020** |
| **TRC** | 1.04 |
| **PAC** | 1.11 |

MCE identified a set of factors that resulted in an *ex ante* TRC below 1.25 in 2020. MCE’s portfolio is in transition, from one focused heavily on residential and small commercial offerings to a more comprehensive portfolio with a range of programs to balance out cost effectiveness. The challenges that MCE faces in forecasting a 1.25 TRC are mostly related to the time required to design, launch and develop a pipeline of projects in the more cost-effective programmatic areas. In 2019, MCE experienced some delays in new program roll outs due to several factors, including: (1) limitations in MCE’s ability to access customer usage data; (2) changing deemed measure parameters; and (3) the complexity of developing new contracting structures for programs using normalized metered energy consumption (NMEC) data.

In 2020, MCE expects to see some of the new programs launched in 2019 begin to deliver savings. MCE’s agricultural, industrial and large commercial programs are expected to deliver cost effective savings to help offset some of the less cost-effective programs in MCE’s portfolio. MCE’s residential NMEC program is also expected to begin generating cost effective savings in 2020, although the projections for this program are conservative because this is a new savings methodology for MCE and there is some uncertainty around how evolving regulatory guidance will affect the program.

Other programs in MCE’s portfolio experienced setbacks as a result of changing market conditions. Two program strategies-- the residential single measure program and the customer-facing project assessment and procurement platform for small commercial customers-- were not found to be cost effective as a result of changes to deemed measure savings, including the 2019 DEER updates. As a result, these two programs were not rolled out to customers and MCE has had to explore other strategies to serve those sectors. Across all programs, MCE continues to adjust measure lists to reflect new savings values and market.

MCE is committed to meeting the evaluated 1.0 TRC requirement through smart, responsive program design and deployment. To facilitate better oversight of programs, MCE is launching new program data management tools and will be increasing the frequency of full project data collection from quarterly to monthly. MCE will use these tools to track progress on energy savings and metrics. Other initiatives to increase savings and lower costs in 2020:

* Scaling up existing programs (including expanding to new service areas);
* Focus on marketing and outreach by using meter data analysis to target customers and working closely with MCE’s account services team;
* Use of performance-based implementation contracts; and
* Deploying measure cost savings strategies within existing programs by increasing transparency and competition among installation contractors.

**Budgets**

The Commission approved funding levels for MCE for Program Years 2018-2025 for each of MCE’s proposed sectors.[[9]](#footnote-9) The budget includes allocations for Evaluation Measurement and Verification (“EM&V”).[[10]](#footnote-10) The Commission approved a total multiyear budget for MCE of $85,736,000 (2018-2025). For Program Years 2018 and 2019, the Commission approved an annual budget of $8,532,000. Although, the Commission approved annual and multiyear budgets, the Commission directed PAs to use the ABAL as an opportunity to adjust their annual budgets “to reflect the 2018-2030 goals adopted in Decision 17-08-025 and the interim greenhouse gas adder adopted in Decision 17-08-022 and other relevant factors to provide a more accurate forecast of expected annual funding levels.”[[11]](#footnote-11) The revisions, however, “must not exceed the overall funding amount” authorized in D.18-05-041, which caps PAs’ total spending for the period 2018-2025.[[12]](#footnote-12) MCE provides the revised portfolio and sector budgets for the business plan period below.

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| **MCE Forecast 2020 Budget and Savings (Net)** |
| **Sector** | **Program Year Budget** | kWh | kW | therms (MM) |
| Residential | $2,578,887 | 5,122,445 | 564 | 0.320 |
| Commercial | $1,358,015 | 3,036,757 | 505 | (0.003) |
| Industrial | $1,666,828 | 2,326,711 | 294 | 0.176 |
| Agriculture | $806,356 | 1,099,740 | 237 | 0.066 |
| Emerging Tech | $0 | na | na | na |
| Public | $0 | na | na | na |
| Codes and Standards | $0 | na | na | na |
| WE&T | $346,667 | na | na | na |
| Finance | $0 | na | na | na |
| OBF Loan Pool | $0 | na | na | na |
| **Subtotal** | $6,756,753 | 11,585,653 | 1,600 | 0.56 |
| **PA EM&V**  | $90,946 |  |  |  |
| **Total PA PY Spending Budget1** | $6,847,698 |  |  |  |
| **Uncommitted and Unspent Carryover balance2** | $4,779,704 |  |  |  |
| **Total PA PY Budget Request3** | $2,067,994 |  |  |  |
| **Authorized PY Budget Cap (D.18-05-041)** | $8,532,000 |  |  |  |

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| **Annual Rolling Portfolio Budget Forecast - True-up** |
| **Sector** | **2018 (actuals)** | **2019** | **2020** | **2021** | **2022** |
| Residential | $695,467 | $3,865,965 | $7,078,017 | $7,078,017 | $6,170,017 |
| Commercial | $617,207 | $1,185,725 | $3,292,922 | $3,292,922 | $2,934,922 |
| Industrial | 0 | $690,423 | $1,283,596 | $1,283,596 | $1,269,596 |
| Agriculture | 0  | $766,449 | $1,253,259 | $1,253,259 | $1,181,259 |
| Emerging Tech | 0 | 0 | 0 | 0 | 0 |
| Public | 0 | 0 | 0 | 0 | 0 |
| Codes and Standards | 0 | 0 | 0 | 0 | 0 |
| WE&T | 0  | $160,000 | $346,667 | $346,667 | $346,667 |
| Finance | $18,524 | 0 | 0 | 0 | 0 |
| OBF Loan Pool | 0 | 0 | 0 | 0 | 0 |
| **Subtotal** | $1,331,198 | $6,668,561 | $13,254,460 | $13,254,460 | $11,902,460 |
| **EM&V[[13]](#footnote-13)** | $16,590 | $111,143 | $211,005 | $211,005 | $189,405 |
| **Total Portfolio Program Year PA Budget** | $1,347,788 | $6,779,704 | $13,465,465 | $13,465,465 | $12,091,865 |
| **Total Authorized Portfolio PY Budget Cap** | $8,532,000 | $8,532,000 | $12,404,000 | $12,404,000 | $10,998,000 |
| **Forecast Portfolio PY TRC** | 0.58 | 1.04 | 1.15 | 1.15 | 1.25 |
| **Forecast Portfolio PY PAC** | 0.64 | 1.18 | 1.32 | 1.32 | 1.44 |

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| **Annual Rolling Portfolio Budget Forecast - True-up *(continued)*** |
| **Sector** | **2023** | **2024** | **2025** | **Total** |
| Residential | $6,170,017 | $6,170,017 | $5,660,017 | $43,128,000 |
| Commercial | $2,934,922 | $2,934,922 | $3,251,922 | $20,667,000 |
| Industrial | $1,269,596 | $1,269,596 | $1,260,596 | $8,327,000 |
| Agriculture | $1,181,259 | $1,181,259 | $1,260,259 | $8,077,000 |
| Emerging Tech | 0 | 0 | 0 | 0 |
| Public | 0 | 0 | 0 | 0 |
| Codes and Standards | 0 | 0 | 0 | 0 |
| WE&T | $346,667 | $346,667 | $346,667 | $2,240,000 |
| Finance | 0 | 0 | 0 | 0 |
| OBF Loan Pool | 0 | 0 | 0 | 0 |
| **Subtotal** | $11,902,460 | $11,902,460 | $11,779,460 | $82,439,000 |
| **EM&V[[14]](#footnote-14)** | $189,405 | $189,405 | $187,405 | $1,318,800 |
| **Total Portfolio Program Year PA Budget** | $12,091,865 | $12,091,865 | $11,966,865 | $83,757,800 |
| **Total Authorized Portfolio PY Budget Cap** | $10,998,000 | $10,998,000 | $10,870,000 | $85,736,000 |
| **Forecast Portfolio PY TRC** | 1.25 | 1.25 | 1.25 |  |
| **Forecast Portfolio PY PAC** | 1.44 | 1.44 | 1.44 |  |

**Energy Savings**

In approving PAs’ business plans, the Commission required ABALs to address energy savings. MCE provides forecasted savings for each program below and a true up of savings for each sector for the entire business plan period.

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| **Annual Rolling Portfolio Savings Forecast - True-up (kWh)** |
| **Sector** | **2018 (actuals)** | **2019** | **2020** | **2021** | **2022** | **2023** | **2024** | **2025** |
| Residential | 336,227 | 2,531,902 | 2,850,293 | 2,850,293 | 2,797,634 | 2,797,634 | 2,797,634 | 2,797,634 |
| Commercial | 823,364 | 1,967,331 | 3,641,084 | 3,641,084 | 4,246,583 | 4,246,583 | 4,246,583 | 4,246,583 |
| Industrial | n/a | 556,588 | 1,179,161 | 1,179,161 | 1,864,651 | 1,864,651 | 1,864,651 | 1,864,651 |
| Agriculture | n/a | 799,656 | 709,938 | 709,938 | 659,030 | 659,030 | 659,030 | 659,030 |
| Emerging Tech | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Public | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Codes and Standards | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| WE&T | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Finance | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| OBF Loan Pool | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| **Total Forecast Portfolio Savings** | 1,159,591 | 5,855,477 | 8,380,475  | 8,380,475  | 9,567,898  | 9,567,898  | 9,567,898  | 9,567,898  |
| **CPUC Goal[[15]](#footnote-15)** | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| **% of Goal[[16]](#footnote-16)** | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |

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| **Annual Rolling Portfolio Savings Forecast - True-up (kW)** |
| **Sector** | **2018****(actuals)** | **2019** | **2020** | **2021** | **2022** | **2023** | **2024** | **2025** |
| Residential | 27 | 233 | 245 | 245 | 235 | 235 | 235 | 235 |
| Commercial | 126 | 358 | 116 | 116 | 81 | 81 | 81 | 81 |
| Industrial | n/a | 41 | 38 | 38 | 59 | 59 | 59 | 59 |
| Agriculture | n/a | 64 | 84 | 84 | 78 | 78 | 78 | 78 |
| Emerging Tech | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Public | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Codes and Standards | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| WE&T | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Finance | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| OBF Loan Pool | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| **Total Forecast Portfolio Savings** | 153 | 696 | 484 | 484 | 454 | 454 | 454 | 454 |
| **CPUC Goal[[17]](#footnote-17)** | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| **% of Goal[[18]](#footnote-18)** | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |

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| **Annual Rolling Portfolio Savings Forecast - True-up (therms)** |
| **Sector** | **2018 (actuals)** | **2019** | **2020** | **2021** | **2022** | **2023** | **2024** | **2025** |
| Residential | 0.07 |  0.27  | 0.42 | 0.42 | 0.46 | 0.46 | 0.46 | 0.46 |
| Commercial | (.001) |  0.03  | 0.01 | 0.01 | 0.01 | 0.01 | 0.01 | 0.01 |
| Industrial | n/a |  0.07  | 0.12 | 0.12 | 0.14 | 0.14 | 0.14 | 0.14 |
| Agriculture | n/a |  0.03  | 0.01 | 0.01 | 0.01 | 0.01 | 0.01 | 0.01 |
| Emerging Tech | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Public | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Codes and Standards | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| WE&T | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Finance | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| OBF Loan Pool | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| **Total Forecast Portfolio Savings** |  0.07  |  0.40  |  0.55  |  0.55  |  0.61  |  0.61  |  0.61  |  0.61  |
| **CPUC Goal[[19]](#footnote-19)** | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| **% of Goal[[20]](#footnote-20)** | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |

**Two Most Recent Years’ Budget, Cost-Effectiveness, and Savings by Program**

|  |  |  |  |
| --- | --- | --- | --- |
|   |   | **2017** | **2018** |
| **Program ID** | **Program Name** | **Authorized Budget** | **Annual Expenditures** | **Authorized****Budget** | **Annual****Expenditures** |
| MCE01 | Multifamily | $667,555  | $491,844  | $728,686 | $558,107 |
| MCE02 | Commercial | $658,711  | $774,411  | $838,745 | $617,207 |
| MCE03 | Single Family | $233,050  | $117,835  | $207,250 | $137,360 |
| MCE04 | Financing | $27,031  | $19,223  | $27,031 | $18,524 |
| **Portfolio Total** | **Portfolio** | **$1,586,347**  | **$1,403,313**  | **$1,801,712** | **$1,331,198** |

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| **Claimed TRC and PAC for 2017-2018** |
| **Year** | **Program** | **TRC Ratio** | **PAC Ratio** |
| 2018 | Commercial | 1.04 | 1.21 |
| 2018 | Multifamily | 0.12 | 0.67 |
| 2018 | Single Family | 0.80 | 0.80 |
| 2017 | Commercial | 1.17 | 1.33 |
| 2017 | Multifamily | 0.26 | 0.55 |
| 2017 | Single Family | 0.34 | 0.34 |

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| **Claimed First Year Net Savings for 2017 and 2018** |
| **Year** | **Program** | **Net kW** | **Net kWh** | **Net Therms** |
| 2018 | Commercial | 126 | 823,364 | -889 |
| 2018 | Multifamily | 8 | 151,217 | 16,468 |
| 2018 | Single Family | 19 | 185,010 | 54,801 |
| 2017 | Commercial | 202 | 1,077,926 | 754 |
| 2017 | Multifamily | 16 | 134,084 | 7,541 |
| 2017 | Single Family | 5 | 50,233 | 26,526 |

**Portfolio and Program Changes**

MCE identified several high-level changes to the portfolio that will help optimize cost effectiveness and achieve savings goals. These changes are responsive to current policy and market dynamics and consistent with MCE’s business plan.

* MCE aims to utilize NMEC in a number of programs to help, leveraging pay-for-performance contracts and competitive bidding.
* In an effort to reduce administrative costs, core elements of program design, implementation, and management will be shifted to implementers.
* MCE will hold competitive solicitations allowing for industry experts and the market to drive program design, implementation of programs, and aggregate customers to deliver meter-verified savings.
* MCE has expanded its portfolio by doubling its service area and offering programs in new sectors such as large commercial, industrial, agriculture, and single family residential while also increasing offerings under existing commercial and multifamily programs.
* MCE is preparing to incorporate fuel substitution measures into programs when revisions to the three-pronged test are approved.

MCE anticipates cost-effectiveness to improve over time. MCE launched programs in new sectors in 2020. This expanded portfolio will experience a natural ramp-up period in which the administrative costs of program design, rollout and customer outreach will have a greater impact on cost effectiveness. Where possible, MCE will reduce implementation costs and customer project costs, which will eventually contribute to a more cost-effective portfolio. MCE describes some of the program-level changes that will improve MCE’s portfolio below.

**Programs that have ended:**

**Residential Single Measure Program:** MCE stopped program development after an analysis of the changes to deemed measures since the business plan was filed in 2017 showed that the program was unlikely to be cost effective. This program was planned for in MCE’s 2019 ABAL but never launched to customers.

**Programs unchanged from 2019 to 2020:**

**Industrial:** This program will provide technical project development resources, procurement support and a mix of deemed and calculated incentives for industrial customers within MCE’s service area.

**Agricultural:** This program will provide technical project development resources, procurement support and a mix of deemed and calculated incentives for agricultural customers.

**Seasonal Savings:** This program offers customers the opportunity to make their cooling and heating schedules more efficient through a series of small adjustments to scheduled temperatures by a software algorithm. Customers are offered the program on their thermostat and/or through a phone app and must opt-in to participate. This program will be expanded to new service areas but otherwise remains largely unchanged.

**Residential Standalone Direct Install:** This program will provide no-cost energy and water saving upgrades, health and safety measures, and access to other resources and non-energy services for single family homeowners and renters. This offering will include conservation education.

**Workforce, Education, and Training (“WE&T”):** MCE has worked with PG&E to develop coordination guidelines to avoid duplication where appropriate, minimize market confusion, and ensure customer choice, and will continue to do so as the portfolio evolves. MCE’s approach to WE&T is to fill gaps and allow the market to dictate program design. MCE will solicit bids to identify existing needs and gaps to determine program design ensuring alignment with policy impacts. MCE will continue working with IOUs to ensure alignment and avoid duplication with the statewide WE&T program.

**Programs that have changes:**

**Multifamily Energy Savings:** This program provides complimentary walk-through energy assessments and technical assistance to identify energy and water saving opportunities at multifamily properties. To help implement these energy upgrades, the program provides cash rebates, assists with contractor bid solicitations and educates and trains operations and maintenance staff. To increase the cost effectiveness of MCE’s program without reducing services available to customers, MCE will be coordinating with BayREN to jointly serve customers.

**Commercial:** MCE continues to serve small commercial customers through its direct install program but has added a comprehensive offering for large commercial customers. The expanded program will make use of custom and NMEC savings calculations and will be work closely with MCEs account services team to offer better services to MCEs larger customers.

**Programs to be launched in 2020:**

**Residential NMEC:** This program will offer behavioral intervention strategies and upgrade recommendations to residential customers. Savings will be calculated and paid for using NMEC methodology.

**Notice**

A copy of this AL is being served on the official Commission service lists for Application 17-01-013, *et al*. and Rulemaking 13-11-005.

For changes to these service lists, please contact the Commission’s Process Office at (415) 703-2021 or by electronic mail at Process\_Office@cpuc.ca.gov.

**Protests**

Anyone wishing to protest this advice filing may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice filing. Protests should be mailed to:

CPUC, Energy Division

 Attention: Tariff Unit

 505 Van Ness Avenue

 San Francisco, CA 94102

 Email: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address as above).

In addition, protests and all other correspondence regarding this AL should also be sent by letter and transmitted electronically to the attention of:

Jana Kopyciok-Lande

Senior Policy Analyst

Marin Clean Energy

1125 Tamalpais Ave.

San Rafael, CA 94901

Phone: (415) 464-6044

Facsimile: (415) 459-8095

jkopyciok-lande@mceCleanEnergy.org

Alice Havenar-Daughton

Director of Customer Programs

Marin Clean Energy

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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.

**Correspondence**

For questions, please contact Jana Kopyciok-Lande at (415) 464-6044 or by electronic mail at jkopyciok-lande@mceCleanEnergy.org.

**Conclusion**

MCE respectfully requests approval of its 2020 energy efficiency portfolio budget.

/s/ Jana Kopyciok-Lande

Jana Kopyciok-Lande

Senior Policy Analyst

Marin Clean Energy

cc: Service Lists: R.13-11-005; A17-01-013, *et al*.

1. D.18-05-041, OP 40, 41 at p. 191. [↑](#footnote-ref-1)
2. To date, MCE is the only community choice aggregator (“CCA”) to have requested energy efficiency funding under Code Section 381.1(a)-(d). [↑](#footnote-ref-2)
3. D.12-11-015 at pp.45-6. [↑](#footnote-ref-3)
4. D.12-11-015 at p. 46. [↑](#footnote-ref-4)
5. D.14-01-033 at p. 14; *see also* D.14-10-046 at p. 120. [↑](#footnote-ref-5)
6. *See* Application of Marin Clean Energy for Approval of its Energy Efficiency Business Plan (Application (“A.”) 17-01-017) filed January 17, 2017. [↑](#footnote-ref-6)
7. D.18-05-041, OP 33 at p. 189. [↑](#footnote-ref-7)
8. D.18-05-041 at pp. 132-37. [↑](#footnote-ref-8)
9. D.18-05-041 at p. 112. [↑](#footnote-ref-9)
10. D.18-05-041 at p. 112. [↑](#footnote-ref-10)
11. D.18-05-041, OP 43 at pp. 191-92. [↑](#footnote-ref-11)
12. D.18-05-041, OP 43 at pp. 191-92. [↑](#footnote-ref-12)
13. EM&V budget includes only the program administrator portion (40%) and excludes the Commission staff portion (60%). [↑](#footnote-ref-13)
14. EM&V budget includes only the program administrator portion (40%) and excludes the Commission staff portion (60%). [↑](#footnote-ref-14)
15. Not applicable to CCA/REN as of 2019, in template for future ABAL when applicable. [↑](#footnote-ref-15)
16. Not applicable to CCA/REN as of 2019, in template for future ABAL when applicable. [↑](#footnote-ref-16)
17. Not applicable to CCA/REN as of 2019, in template for future ABAL when applicable. [↑](#footnote-ref-17)
18. Not applicable to CCA/REN as of 2019, in template for future ABAL when applicable. [↑](#footnote-ref-18)
19. Not applicable to CCA/REN as of 2018, in template for future ABAL when applicable. [↑](#footnote-ref-19)
20. Not applicable to CCA/REN as of 2018, in template for future ABAL when applicable. [↑](#footnote-ref-20)