California Energy Efficiency Coordinating Committee

Full Quarterly CAEECC Meeting #31

December 2, 2021 9:00 – 12:15

Teleconference

Draft Meeting Summary

Facilitators: Dr. Jonathan Raab, Raab Associates & Katie Abrams, CONCUR

On December 2, 2021, the California Energy Efficiency Coordinating Committee (CAEECC) convened a quarterly meeting of the full CAEECC via WebEx. Over 98 individuals participated, including representatives from 23 CAEECC Member organizations. A full list of meeting registrants is provided in Appendix A.

Meeting facilitation was provided by Dr. Jonathan Raab (Raab Associates) and Katie Abrams (CONCUR). Meeting materials, including presentations, are provided on the CAEECC website here: <https://www.caeecc.org/12-2-21-full-caeecc-mtg>

The PowerPoint presentation used throughout the meeting is available on the CAEECC website (see link above to Meeting Materials, *Combined 12/2 Slide Deck (11.29.21),* under “Documents Posted Before the Meeting”).

Following the presentations, key clarifying questions or comments are listed and relevant *responses to questions* are noted in *italics*. Where multiple responses were given, these responses are listed as sub-bullets. Public comment, and any responses given, is primarily included in Appendix B (Q&A and Chat Log). Next Steps, at the end of this document, list all next steps discussed at the meeting.

**Introductions**

At the beginning of the meeting, CAEECC facilitator Jonathan Raab opened the meeting, and reviewed the agenda. The focus of the meeting is on important updates; the new Composition, Diversity, Equity, and Inclusion Working Group; Strategies for Business Plans/4 year Applications; and 2022 Planning. Katie Abrams explained a new process piloted at this meeting to foster greater public participation (both verbal and written).

**SESSION 1: Important Updates**

***3rd Party Solicitation Process***

Vanessa Mapula Garcia, SDG&E, provided an update on the investor-owned utility (IOU) third party (3P) solicitation process (see *Combined 12/2 Slide Deck, slides 7-11,* posted to the meeting page).

Clarifying Questions and Comments:

* Will SCE’s future (2022 and beyond) targeted solicitations focus on certain portfolio segments like Equity?
  + *SCE: Still being finalized; likely Equity, or perhaps filling other gaps in Resource Acquisition. We’ll also be putting out a solicitation for the new market access and reliability programs after it’s approved by the Commission (not on these slides since they’re not part of the EE Proceeding)*
* Are there additional solicitations for SDG&E in 2022?
  + *SDG&E: solicitation slides are accurate through 12/31/2021*
* Any updates on program activities given that majority of solicitations have now been completed? This applies to the several approved contracts that have not yet launched and are pending approval.
  + *SCE: majority of SCE-led programs have been approved; statewide programs are a mix of under review and currently being implemented*
  + *PG&E: all Advice letters have been approved and are in implementation planning or currently being implemented*
  + *SDG&E: Now that RA programs are solicited, focus will likely for new Equity segment programs, but also identifying additional gaps.*

***Market Support and Equity Metrics WG Debrief***

Jonathan Raab and Katie Abrams summarized key outcomes, recommendations, and non-consensus issues from the Market Support and Equity Metrics WGs (MSMWG and EMWG, respectively). Jonathan Raab also presented the evaluation scores from those two WGs, as well as other past WG evaluations. See *Combined 12/2 Slide Deck, slides 12-21,* posted to the meeting page. There were no questions or feedback on either of the Metrics WGs.

***I-REN Update***

Katie Abrams, facilitator, welcome I-REN as the 23rd current CAEECC Member. Benjamin Druyon, I-REN’s CAEECC lead representative, provided a brief overview of the organization. Nils Strindberg, CPUC, presented on Energy Division’s decision to approval I-REN’s application (see *Combined 12/2 Slide Deck, slides 22-26,* posted to the meeting page). There were no questions or feedback.

**SESSION 2: CAEECC Composition, Diversity, Equity, and Inclusion Working Group (CDEI WG)**

***Presentation, Questions & Comments on Prospectus***

Katie Abrams provided an overview of a proposed new WG on CAEECC Composition, Diversity, Equity, and Inclusion Working Group (CDEI WG) (see *Combined 12/2 Slide Deck, slides 30-37,* posted to the meeting page).

Summary of Member Questions and Comments:

* What’s driving the timeline? Challenging with Biz Plan applications due mid-February 2022
  + *Lara Ettenson, NRDC: If we wait to launch after the applications are due (or even mid-way through), the CDEI recommendations wouldn’t go to full CAEECC for review and approval until at least the June mtg, which would present a challenge based on ED’s clear guidance that all feasible recommendations be implemented by August 2022*
  + *Alison LaBonte (CPUC): PAs aren’t the only stakeholders and they don’t need to have their Biz Plan reps serve on this WG – could be a different group of reps. This work needs to be a priority.*
  + *Jonathan, facilitator: note that normally CAEECC would look at membership composition at the Q4 meeting; also, the March meetings will be split in two, with the first focusing on applications and the second focusing on CDEI WG recommendations*

***Presentation, Questions & Comments on Recruitment strategy and timeline***

Katie Abrams provided an overview of the proposed, and in-progress, recruitment strategy and timeline (see *Combined 12/2 Slide Deck, slides 38-39,* posted to the meeting page).

Summary of Member Suggestions:

* Members with community colleges and universities should conduct targeted outreach
* Direct outreach to organizations who aren’t currently plugged into CAEECC is more likely to be successful than email blasts from an unknown sender
* Stephen Kullman offered to reach out to tribal groups in RCEA’s service area

***Initial CDEI Team Recommendations for CAEECC***

Katie Abrams presented a series of recommendations from the CDEI Design Team for the CAEECC’s consideration (see *Combined 12/2 Slide Deck, slide 40,* posted to the meeting page), including proposed meeting norms. Alison LaBonte, CPUC, requested that Member organizations look within for representatives that are racially diverse and/or have DEI experience to foster greater inclusivity on CAEECC. There were no questions or feedback on initial recommendations and meeting norms.

***Public input***

A transcript of questions from the Public (and responses from Co-Chairs) is available in Appendix B. A summary of verbal input is below.

Summary of Verbal Public Feedback:

* Anna Soloria, CHOC: suggest looking at community-based organizations. Shout out to Laura at SCE for seeking inclusion through ESA (low-income programs). Hearing the voices of people who live paycheck to paycheck and experience high energy burdens, are interested in new technology but can’t afford it or understand it – these populations and communities will be important to target. Suggest targeting CBOs. Clean Energy Tech has a low-income ambassador program which sought out participants and reimburses participants for their time. Also, does CAEECC have high membership fees – if so this could be a barrier to participation?
  + *CAEECC has never had membership fees, though there have been barriers to participation based on the time commitment [and expenses for traveling to meetings]. We will clarify this going forward.*
* Susan Davidson, 3CE: Please consider adding CCA staff
  + *Nils: CCAs were included in the listservs that the CDEI design team reached out to*

***Approval of Prospectus & Recruitment Strategy***

CAEECC members signed off on both with the following modifications to the Prospectus:

* Develop a plan to conduct outreach to Native American tribal groups
* Change implementation timeline to allow for potential for longer timeline beyond August for some recommendations (TBD in final recommendations).

A redlined version of the Prospectus is available on the meeting page, linked above.

***Review & finalize Conflict of Interest Policy update***

Jonathan Raab reminded attendees of the proposed new Groundrule that was piloted for the Market Support and Equity Metrics WGs: a disclosure requirement for non-CAEECC members participating in Working Groups (see *Combined 12/2 Slide Deck, slide 44,* posted to the meeting page).

Jonathan Raab asked if any WG members had objections to the newly presented language, and hearing none, he summarized that the facilitation team will finalize the Groundrules document, post the updated version to the CAEECC website, and incorporate it into the application process for forthcoming WGs.

**SESSION 3: Strategies for Business Plans / 4-year Applications**

***Discuss PA segmentation strategies for upcoming Business Plans/4 year Applications (reflecting on Metrics WGs recommendations and BBALs)***

Jonathan Raab presented a summary table of PA’s 2022-2023 BBAL Segmentation Budgets and a slide with a series of discussion questions (see *Combined 12/2 Slide Deck, slides 49-50,* posted to the meeting page). He also referred participations to the compendium of PAs’ budgets and programs (see *Program Segmentation in Recent BBAL Filings*, posted to the meeting page).

Discussion questions & answers:

1. **Do you have any questions for individual PAs on their BBAL segmentation decisions, and is this segmentation what stakeholders can expect to see in PAs’ Applications?**

* *SDGE: Plan to increase Equity and Market Support segments. For context on why CAEECC’s BBAL summary table shows <1% of the budget going to Equity, it’s worth noting that SDGE does have programs that target hard-to-reach (HTR) and disadvantaged communities (DAC) but they’re categorized as resource acquisition (RA).*
* *SCE: BBAL focus needed to be on what could get up and running in 2022 and 2023. Anticipate higher percent of Equity programs in the Applications*
* *BayREN: Will likely have the same breakdown as in BBALs*
* *SoCalREN: Propose Equity programs be implemented statewide and are limited to DACs and HTR*
  + *Lara Ettenson, NRDC clarified the definitions of DACs and HTRs (see Appendix B, chat) – and that the definition of “underserved” was discussed in the Equity Metrics WG, and was a non-consensus item, which does leave open the possibility of PAs’ proposing a definition broader than DAC and HTR*
  + *Jenny Berg, BayREN, noted that the revised CPUC ESJ Action Plan which has language and definitions relevant in particular to the Bay Area*
* *PG&E: Anticipate approximately 30% for Equity and Market Support, with proportionally higher in MS since REN partners are focused on Equity*
* *MCE: Represents incremental change, but the application will show much higher Equity*

1. **For PA CAEECC Members: Is there anything you’d like feedback on regarding segmentation strategies for the upcoming Business Plans/4 year Applications?**

* Can ED provide greater definition and clarity for segmentation?
  + *Alison: Identifying PA’s questions and challenges was a key reason why the CPUC asked PAs to prepare BBAL filings.*
  + *Nils: For context, ED wanted to leave some flexibility to the PAs [in their segmentation decisions] since programs may have multiple elements*

1. **For the non-PA CAEECC Members: Do you have any advice for the PAs on their segmentation strategies for the upcoming Business Plans/4 year Applications?**

* CAEECC Member recommendation that in the filings, PAs provide context on their segmentation budgets so that PAs like SDG&E who have less than 1% categorized as Equity can clarify that they serve HTR customers but through RA programs.

***Public input***

A transcript of questions from the Public (and responses from Co-Chairs) is available in Appendix B. A summary of verbal input is below. There were no verbal comments or questions.

***Discuss how PAs will address non-consensus recommendations in MSMWG and EMWG reports***

Jonathan Raab presented excerpts from the Market Support and Equity Metrics report that summarize how the WG agreed PAs should address non-consensus recommendations (see *Combined 12/2 Slide Deck, slide 51,* posted to the meeting page). He noted that while the language is slightly different, the content of the recommendation is the same across the two WGs.

Member Feedback:

* Although it’s not required per this WG recommendation, it would be useful for PAs to include both options, not just their preference
  + *Alison LaBonte, CPUC suggested PAs consider setting targets now, noting that starting to set targets now will provide insights to barriers and help improve target setting in the future.*
  + *Ely Jacobsohn, CPUC requested that PAs note challenges in their submission. The template provides space for PAs to note challenges and questions. We understand the constraints in the absence of clear direction.*
  + *Jonathan proposed that PAs consider setting targets where they can, such as in programs that have been operating for some period of time – and where PAs don’t feel they have enough information, propose a schedule/timeline for setting targets*

Jonathan asked if anyone objected to the WG recommendation that for any non-consensus issue, PAs select one or both of the options (but not a different approach) and be clear about which option they chose for the sake of transparency. No Members objected to this approach.

**SESSION 4: CAEECC 2022 Planning**

***2022 Workplan & full Quarterly Meeting Dates***

Jonathan Raab presented a proposed 2022 workplan and proposed 2022 full Quarterly meeting dates. A few Members noted scheduling conflicts.

Regarding scheduling the first March meeting: A PA Member asked whether the early March meeting could be delayed as their staff will be recovering from producing the filings by mid-February. A non-PA Member suggested holding the first March meeting (focused on applications) no later than the week of March 7th, considering stakeholders have 30 days from application filing to file a protest. Nils Strindberg, CPUC noted they can potentially adjust the deadlines through a ruling. A few members discussed that it might be worth extending the application protest deadline now that there are nearly double the number of PAs applications for interested stakeholders to review.

Note: subsequent to the meeting ED pointed out potential ED staff conflicts with the June and December proposed quarterly meeting dates due to conflicts with Commission Voting Meetings.

The facilitation team will circulate a new set of Quarterly meeting dates via email after discussing with Co-Chairs and ED.

***Potential Topics for Next CAEECC Meeting Series***

Jonathan Raab presented a list of proposed topics for the two March quarterly CAEECC meetings (see *Combined 12/2 Slide Deck, slide 56,* posted to the meeting page).

Summary of discussion and feedback:

* Suggestion to add the following topics
  + Update on Metrics and segmentation
  + EE Decision on Summer Readiness
  + Update from MCE and the IOUs on market assessments??
* A PA requested, in light of the February filing date, ample advance notice before the March 3rd meeting for PAs presentations on their applications. Jonathan proposed that the focus would likely include segmentation, metrics, budgets, and cost-effectiveness, but that the facilitation team will work with PAs and others to develop the agenda.
* PA suggestion that each PA consider hosting their own webinars in addition to the March full CAEECC meeting on their respective Business Plans/4-Year Applications

***CAEECC Facilitation RFP***

Lara Ettenson, Co-Chair from NRDC, provided an update on the rebidding of the CAEECC Facilitation contract with new contract commencing in July of 2022 (see *Combined 12/2 Slide Deck, slide 57,* posted to the meeting page). A Member suggested that the contract include scope for onboarding of new Members.

**Wrap Up/ next Steps**

***9.2 Meeting Evaluation***

Jonathan Raab summarized the results from the 9/2 full CAEECC evaluation (see *Combined 9/2 Slide Deck, slide 59,* posted to the meeting page). He then instructed all Members to fill out the CAEECC Evaluation for today’s meeting, and encouraged other participants to do so as well.

Next steps are as follows:

**CAEECC Members:**

* **Evaluation:** Fill out the CAEECC Evaluation of the meeting (as required by our CAEECC groundrules) no later than Thursday December 9, 2021

**CAEECC Members & Members of the Public**

* Consider joining the CAEECC Composition, Diversity, Equity, and Inclusion Working Group – and spread the word to your networks

**Energy Division:**

* **Consider a ruling to extend the deadline for protests to the February 2022 filings,** in light of the increase in the number of applications for stakeholders to review

**Facilitation Team:**

* **Groundrules Update**
  + Finalize Groundrules document presented to and approved by CAEECC members at today’s meeting – and post to CAEECC website by Thursday December 9th
* **CAEECC Composition, Diversity, Equity, and Inclusion Working Group** 
  + Finalize Prospectus per today’s feedback and post to 12/2 and CDEI meeting pages.
  + Implement recruitment strategy
* **Meeting Facilitation:**
  + Propose new set of meeting dates for 2022 Full CAEECC Quarterly meetings (in consultation w/Co-Chairs and ED)
  + Develop, post and notice draft meeting summary (this document) to the meeting webpages by Thursday December 9, 2021, COB.
  + Review and analyze survey evaluations of today’s Full CAEECC meeting for continuous improvement opportunities
  + Prepare for next Full CAEECC meeting series – including adding agenda topics based on feedback from today’s meeting

**Appendix A: Meeting Attendants**

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| **12.2.21 Full Quarterly CAEECC Meeting Attendance** | | |
| **CAEECC Member Representatives, Alternates, & Presenters** | | |
| **Organization** | **First Name** | **Last Name** |
| 3C-REN | Alejandra | Tellez |
| BayREN | Jennifer | Berg |
| CalPA | Ashlyn | Kong |
| CalPA | Mike | Campbell |
| CEC | Brian | Samuelson |
| CEDMC | Greg | Wilker |
| CEE | Bernie | Kotlier |
| City of San Francisco | Lowell | Chu |
| CodeCycle | Dan | Suyeyasu |
| CSE | Stephen | Gunther |
| I-REN | Benjamin | Druyon |
| I-REN | Casey | Dailey |
| LGSEC | Demian | Hardman-Saldana |
| MCE | Alice | Havenar-Daughton |
| MCE | Jana | Kopyciok-Lande |
| NRDC | Lara | Ettenson |
| PG&E | Ben | Brown |
| PG&E | Lucy | Morris |
| PG&E | Rob | Bohn |
| RCEA | Aisha | Cissna |
| RCEA | Stephen | Kullmann |
| SBUA | Ted | Howard |
| SCE | Christopher | Malotte |
| SCE | Elizabeth | Gomez |
| SDG&E | Vanessa | Mapula Garcia |
| SDG&E | Elaine | Allyn |
| SJVCEO | Courtney | Kalashian |
| SMW Local 104 | Randy | Young |
| SoCalGas | Halley | Fitzpatrick |
| SoCalGas | Kevin | Ehsani |
| SoCalREN | Lujuana | Medina |
| SoCalREN | Fernanda | Craig |
| The Energy Coalition | Laurel | Rothschild |
| The Energy Coalition | Marc | Costa |
| **Ex-Officio** | | |
| CPUC/Energy Division | Nils | Strindberg |
| CPUC/Energy Division | Ely | Jacobsohn |
| CPUC | Christina | Torok |
| CPUC | Jen | Kalafut |
| CPUC | Alison | LaBonte |
| **Facilitators** | | |
| Concur, Inc | Katie | Abrams |
| Raab Associates | Jonathan | Raab |
| **Other Participants** | | |
| 3CE | Susan | Davison |
| Arc Alternatives | Andrew | Meiman |
| BayREN | Aleka | Seville |
| Blue Point Planning | Hayley | Padden |
| Cadmus Group | Karen | Horkitz |
| Cascade Energy | Siva | Sethuraman |
| CEC | Payam | Bozorgchami |
| CAEATFA | Kaylee | D'Amico |
| CHOC Housing | Anna | Solorio |
| CPUC | Antoinette | Siguenza |
| CPUC | Augustus | Clements |
| CPUC | Jared | Eakins |
| CPUC | Jason | Symonds |
| CPUC | Jessie | Levine |
| CPUC | Justin | Galle |
| CPUC | Katherine | MacDonald |
| CPUC | Monica | Palmeira |
| CPUC | Rachelle | George |
| CPUC | Sasha | Merigan |
| CPUC | Sophie | Babka |
| CPUC | Nicole | Cropper |
| Daikin Comfort | Matt | Baker |
| DNV | Bob | Ram |
| DNV | Mark | Darden |
| D.A. Consulting | Don | Arambula |
| e4thefuture | Stephen | Cowell |
| Frontier Energy | Chad | Ihrig |
| Frontier Energy | Nancy | Barba |
| FS Consulting | Frank | Spasaro |
| Grounded Research | Jenn | Mitchell-Jackson |
| Grounded Reseach | Mary | Sutter |
| Jay Luboff Consulting | Jay | Luboff |
| Lincus | Cody | Coeckelenbergh |
| MW Consulting | Mark | Wallenrod |
| OC Power | Antonia | Graham |
| Oracle | David | Siddiqui |
| PG&E | Caroline | Massad Francis |
| PG&E | Kathleen | Schulenberg |
| PG&E | Lindsey | Tillisch |
| PG&E | Mananya | Chansanchai |
| PG&E | Matthew | Braunwarth |
| QCSCA | Allan | Rago |
| Resource Innovations | Kimberly | Rodriguez |
| RMS Energy Consulting | Jeremy | Sasse |
| SCE | Karen | Klepack |
| SCE | Patricia | Neri |
| SCE | Paul | Kubasek |
| SEI Inc | Stephanie | Doi |
| Silent Running | James | Dodenhoff |
| SoCalGas | Andrew | Kwok |
| SoCalGas | Betty | Tran |
| SoCalGas | Emma | Ponco |
| SoCalGas | Sebastian | Garza |
| TEAA | Ross | Colley |
| Tetratech | Nick | Richter |
| The Energy Coalition | Rebecca | Hausheer |
| unknown | Janelle | Villalba |
| Willdan | Eric | Woychik |
| Willdan | Liz | Fitzpatrick |
| Willdan | Sam | Rade |

**Appendix B: Q&A and Chat Log**

**Q&A Session for 12.2.21 Full Quarterly CAEECC Mtg**

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­Kaylee D'Amico­

Q: ­Can the speaker provide any updates on program activities given that the majority of solicitations have now been completed? It is my understanding that several approved contracts have not yet launched programs, are pending further approval from the PUC, etc.­

‑­Lara Ettenson

A: this is also a helpful resource @Kaylee to find status of contracts resulting from solicitations: https://4930400d-24b5-474c-9a16-0109dd2d06d3.filesusr.com/ugd/849f65\_e4640d21f0ec4ac08511465108794384.xlsx?dn=Joint%20IOU\_Third-Party%20Implementers%20Table%5B2%5D.xlsx

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­Caroline Massad Francis­

Q: ­Confirming it is 30 days - rule 2.6­

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**Chat Session for 12.2.21 Full Quarterly CAEECC Mtg**

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Susan Davison: Please consider adding CCA staff.

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Lucy Morris: I believe that currently the CPUC link to get signed up to the service lists isn't working. We have staff who wanted to be added to the main EE list and the link generates an error. Maybe the CPUC could get that fixed to ensure everyone who wants to be on those lists can sign up since those are a key communication/awareness raising channel.

Nils Strindberg: Hi Lucy, if you are having these problems please have them reach out to the Public Advisor's Office. Here is a link to their website: https://www.cpuc.ca.gov/about-cpuc/divisions/news-and-public-information-office/public-advisors-office

Lucy Morris: Thanks Nils. One that public advisors office site, the link to be added to a service list still doesn't work. It generates an error "The resource you are looking for has been removed, had it's name changed or is temporarily unavailable." Would you suggest I email the process office directly and request additions to the relevant service list?

Lucy Morris: Regardless, the link should be fixed so that the broader interested stakeholders can easily get added to service lists.

Nils Strindberg: Hi Lucy, yes I would recommend emailing them or leaving a voice message.

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Alison LaBonte (she/her): Thank you all for your participation in helping us launch the Composition, Diversity, Equity and Inclusion working group.

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Anna Solorio CHOC: How are you defining Equity support

Anna Solorio CHOC to All Panelists: Specifcallly how does BayRem support Equity

Lara Ettenson: it's in D.21-05-031: The equity segment is defined as “programs with a primary purpose of providing energy efficiency to hard-to-reach or underserved customers and disadvantaged communities in advancement of the Commission’s Environmental and Social Justice (ESJ) Action Plan. Improving access to energy efficiency for ESJ communities, as defined in the ESJ Action Plan, may provide corollary benefits such as increased comfort and safety, improved air quality, and more affordable utility bills, consistent with Goals 1, 2, and 5 in the ESJ Action Plan.”

Lara Ettenson: Note that the Equity category is distinct from Energy Savings Assistance (ESA) programs so as to avoid overlap with program offerings that low-income populations could receive at no cost through existing channels

Anna Solorio CHOC: BayRem does not really have DACs

Anna Solorio CHOC: So how is BayRem defining HTR

Anna Solorio CHOC: I s BayRem mostly rebates?

Anna Solorio CHOC: Yes would love to have a more roboust dicussion but if you could sned me more information on BayRems equity programs asolorio@chochousing.org

Lara Ettenson:Hi Anna - HTR is also in a decision. I will find it and paste it here.

Lara Ettenson:Hard-to-Reach (HTR) defined in D.18-05-041 section 2.5.2

• Two criteria are considered sufficient if one of the criteria met is the geographic criteria defined below. There are common as well as separate criteria when defining hard-to-reach for residential versus small business customers. The barriers common to both include:

• Those customers who do not have easy access to program information or generally do not participate in energy efficiency programs due to a combination of language, business size, geographic, and lease (split incentive) barriers. These barriers to consider include:

• Language – Primary language spoken is other than English, and/or

• Geographic – Businesses or homes in areas other than the United States Office of Management and Budget Combined Statistical Areas of the San Francisco Bay Area, the Greater Los Angeles Area and the Greater Sacramento Area or the Office of Management and Budget metropolitan

Lara Ettenson: • For small business added criteria to the above to consider:

• Business Size – Less than ten employees and/or classified as Very Small (Customers whose annual electric demand is less than 20kW, or whose annual gas consumption is less than 10,000 therm, or both), and/or

• Leased or Rented Facilities – Investments in improvements to a facility rented or leased by a participating business customer

• For residential added criteria to the above to consider:

• Income – Those customers who qualify for the California Alternative Rates for Energy (CARE) or the Family Electric Rate Assistance Program (FERA), and/or

• Housing Type – Multi-family and Mobile Home Tenants (rent and lease)”

• Modification: include disadvantaged communities (as designated by CalEPA) in the geographic criteria for hard-to-reach customers

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Anna Solorio CHOC: Thanks for the information just makes me more curious about the PA programs that target Equity