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September 1, 2020

Advice XXXX-G/XXXX-E (Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: **PG&E's 2021 Energy Efficiency Annual Budget Advice Letter in Compliance with Decisions 15-10-028 and 18-05-041**

I. Purpose

Pacific Gas and Electric Company (PG&E) hereby submits its 2021 energy efficiency (EE) portfolio budget (2021 EE Budget) by Tier 2 advice letter in compliance with the *Decision Re Energy Efficiency Goals for 2016 and Beyond and Energy Efficiency Rolling Portfolio Mechanics,* the "Rolling Portfolio Decision" (D.15-10-028),[1] the *Decision Addressing Energy Efficiency Business Plans* (D.18-05-041),[2] and guidance from the California Public Utilities Commission (CPUC or Commission) Energy Division (ED) staff (Staff).

PG&E requests that the Commission approve its 2021 EE spending budget of $237,663,007 effective as of January 1, 2021, for PG&E's approved EE programs.

II. Background

A. Regulatory Requirements

The Rolling Portfolio Decision (D.)15-10-028 requires each EE program administrator (PA) to file an advice letter with a budget for the next calendar year's EE portfolio by the first business day of September each year.[3]

Subsequently, the Commission issued the *Decision Addressing Energy Efficiency Business Plans* D.18-05-041, which adopted the maximum annual budgets set forth in the Business Plans for 2018-2025.

[1] D.15-10-028, Ordering Paragraph (OP) 4.
[2] D.18-05-041, OP 41-47.
[3] D.15-10-028, OP 4.

B. Filing Requirements

D.15-10-028 requires each program administrator's (PA) advice letter to contain:

- A portfolio cost-effectiveness statement; and
- Application summary tables with forecast budgets and savings by sector and program/intervention.

Furthermore, D.18-05-041 provides additional guidance to PAs regarding ABAL submission. D.18-05-041 requires that the investor-owned utilities' (IOUs) ABALs include the following:

- A forecasted Total Resource Cost (TRC) test score that meets or exceeds 1.25, except during program years 2019-2022, when the forecasted TRC must meet or exceed 1.0;
- Forecasted energy savings goals that must meet or exceed Commission-established savings goals for each IOU; and
- A forecasted budget that must not exceed the PA's annual budget in the approved Business Plans, or (if applicable) the revised annual budget in this ABAL.[4]

If a PA's ABAL submitted for program year 2019 through program year 2022 fails to meet the criteria above, including a forecasted portfolio TRC of 1.0 during program years 2019-2022, the PA is to hold a workshop to provide transparency into the associated challenges and receive feedback that would potentially aid the PA in revising its Business Plan pursuant to D.15-10-028 for Commission approval.[5]

C. Contents of this Filing

PG&E's advice letter is organized as follows:

- Portfolio Budget, Goals, and Cost-Effectiveness Summary
- Forecasting Assumptions
- COVID Considerations
- Cost-Effectiveness Challenges
- Cost Recovery
- Prior Years' Unspent Funds
- 2021 Program Changes

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4 D.18-05-041, p. 133
5 D.18-05-041, p. 134-135

- Evaluation, Measurement & Verification (EM&V)
- Metrics to date

In addition to the information above, PG&E's 2021 ABAL includes the following materials:

- Attachments:
  - Attachment 1 – Joint IOUs Statewide Funding Allocations
  - Attachment 2 – Supplemental Budget Tables
  - Attachment 3 – California Energy Data and Reporting System (CEDARS) Filing Confirmation
  - Attachment 4 – Appendices
  - Attachment 5 – Caps and Targets Table
  - Attachment 6 – Program Closures

III. Discussion

A. Portfolio Budget, Goals, and Cost-Effectiveness Summary

PG&E proposes a 2021 EE budget of $237.7 million.

Table 1 provides an overview of PG&E's 2021 forecasted portfolio budget, savings, and cost-effectiveness. The net savings, Total Resource Cost (TRC), Program Administrator Cost (PAC), Ratepayer Impact (RIM) forecast values exclude market effects. PG&E is forecasting a portfolio that meets the new 2021 savings goals. PG&E's portfolio is not forecasted to be cost-effective in 2021 as a result of myriad factors. PG&E's portfolio forecasting assumptions and cost-effectiveness challenges are discussed in sections III.B and III.C below, respectively.

Table 1: PG&E 2021 Budget and Savings Summary

Sector	Program Year (PY) Budget	PG&E PY FORECAST ENERGY SAVINGS (Net)		
		kWh	**kW**	**MMtherms**
Residential	$59,532,720	183,152,396	45,482	7.0
Commercial	$53,957,537	82,570,351	12,591	4.0
Industrial	$25,874,042	45,781,942	3,905	3.3
Agricultural	$11,563,312	17,782,872	3,962	0.1
Emerging Tech	$6,410,433	0	0	0.0
Public	$18,841,875	14,861,160	1,653	0.2
WE&T	$8,797,280	0	0	0.0
Finance	$4,801,794	46,651,867	7,931	0.1
OBF Loan Pool	$13,500,000	0	0	0.0
PG&E Total Program Savings (w/out C&S)	$203,278,993	390,800,588	75,524	14.6
CPUC Program Savings Goal		358,000,000	73,000	14.0
Forecast savings as % of CPUC Program Savings Goal		109%	103%	105%
Codes and Standards	$24,877,494	976,402,091	212,619	14.5
PG&E EM&V	$9,506,520			
PG&E PY Spending Budget Request[1]	$237,663,007			
(LESS) PG&E Estimated Uncommitted and Unspent Carryover Balance[2]	$10,000,000			
PG&E PY Budget Recovery Request[3]	$237,663,007			
PG&E Authorized PY Budget Cap (D.18-05-041)[4]	$374,399,466			
MCE PY Budget Recovery Request (excl. CCA Uncommitted/Unspent Carryover)[5]	$7,083,046			
RCEA PY Budget Recovery Request (excl. CCA Uncommitted/Unspent Carryover)[6]	$0			
BayREN PY Budget Recovery Request (excl. CCA Uncommitted/Unspent Carryover)[5]	$23,731,266			
3C-REN PY Budget Recovery Request (excl. CCA Uncommitted/Unspent Carryover)[5]	$2,974,746			
Total PA (IOU+CCAs+RENs) Recovery Budget	$271,452,065			
PG&E Forecast PY TRC[7]	0.93			
PG&E Forecast PY PAC[7]	1.25			
PG&E Forecast PY RIM[7]	0.55			

[1] This is the amount by which Statewide 25% requirement will be measured and what the IOU intends to spend in the program year, including carryovers.

[2] The estimated balance of all unspent and uncommitted reflects the total unspent uncommitted for all prior program years up to and through December 31, 2019. These funds are an estimate at the time of this Advice Letter filing; these numbers are not yet final.

[3] The amount of funds to be collected (budget recovery) for PY 2020.

[4] The IOU Authorized PY Budget Cap uses the "Total Program" budget from PG&E's approved Business Plan Table 1.5. This total 2020 business plan budget was unchanged in the budget true-up table presented in PG&E's 2019 ABAL, Second Supplemental Advice 4011-G-B/5375-E-B filed on January 23, 2019 and approved by the CPUC on April 2, 2019.

[5] MCE, BayREN, and 3C-REN 2021 budget recovery requests based on approved 2020 ABAL budgets, including 4% EM&V. These amounts are subject to change upon MCE, BayREN, and 3C-REN 2021 ABAL submissions.

[6] RCEA 2021 budget recovery request is set at $0. PG&E transferred funds from its 2020 budget to RCEA for the full 3-year program amount approved via Resolution E-5050, as directed by the Resolution. No further cost recovery for RCEA is required at this time.

[7] The portfolio TRC, PAC, and RIM presented in this table are lower than the TRC, PAC, and RIM including codes and standards and market effects.

Table 2 provides the TRC test and PAC test forecasts for its 2021 EE portfolio, both with and without the Codes and Standards program benefits. The TRC and PAC estimates exclude market effects.

Table 2: PG&E 2021[6] Cost-Effectiveness Statement

Cost-Effectiveness Scenario	2021 TRC Forecast	2021 PAC Forecast	2021 RIM Forecast
Total portfolio including the Energy Savings and Performance Incentive (ESPI) award, and excluding C&S and market effects	0.93	1.25	0.55
Total portfolio including the ESPI award and C&S, and excluding market effects	1.92	6.35	0.66

TRC and PAC calculations include costs for:

- Resource and non-resource programs, including Financing and Workforce Education and Training (WE&T) programs;
- EM&V
- An estimated $14.7 million for PG&E's ESPI award in 2021;[7] and
- Statewide (SW) Marketing, Education and Outreach (ME&O) costs.[8]

TRC and PAC calculations exclude:

- Emerging Technologies (ET) program costs;
- BayREN, 3C-REN, RCEA, and MCE benefits and costs;[9]
- Financing costs including credit enhancements approved for the Statewide Financing Pilots in D.13-09-044; and
- Energy Savings Assistance (ESA) benefits and costs.

1. Integrated Demand Side Management (IDSM)

Since 2019, each IOU PA has been ordered to set aside a minimum of $1 million for the residential sector and a load-share-proportional fraction of $20 million for the commercial sector from each IOU PA's IDSM budget for testing and deployment of integration strategies.[10] In consultation and agreement with the California IOUs, PG&E will budget $8 million of the required $20 million for the commercial sector. With an additional $1 million of IDSM budget for the residential sector, PG&E's budget for IDSM activities will total $9 million.

6 The 2021 CET User Interface from CEDARS was used to calculate cost-effectiveness.
7 PG&E's $14.7 million ESPI award estimate for 2021 is based on historical trends of ESPI awards from past years.
8 PG&E is including SW ME&O costs in its TRC calculation per direction on forecasted TRC costs in the EE Policy Manual V6.0 p.26 and D.09-09-047 pp.69-70, 288.
9 D.12-11-015.
10 D.18-05-041, OP 10

B. Forecasting Assumptions

New Local Programs
PG&E has signed new local programs across all five sectors (Industrial, Agricultural, Public, Commercial, and Residential) through the first wave of PG&E's local third-party solicitation. The Industrial, Agricultural, and Public sectors are fully covered, while coverage for the commercial and residential sectors will be addressed in the second wave of PG&E's local third-party solicitation that is currently underway. Because commercial and residential sector program contracts are still pending, this 2021 ABAL filing includes placeholder forecasts for new local programs in the commercial and residential sectors. Local Government Partnership (LGP) non-resource programs are launching in July 2020 to support resource acquisition programs and are included in this 2021 forecast. PG&E's forecasts for these sectors incorporate forecasts submitted by those third parties. Third parties will have a greater responsibility to deliver verifiable and persistent energy savings and understand and abide by all policies and regulations that govern energy-efficiency programs and platforms.

New Statewide Programs
This 2021 ABAL forecast includes all PG&E-led statewide (SW) programs expected to have launched or launching in 2021. PG&E developed forecast data for these SW programs it is leading. This 2021 ABAL forecast also includes forecast information provided by other IOU leads for non-PG&E-led SW programs.

Existing Programs
This 2021 ABAL forecast includes several existing programs that qualify under the new third-party definition from D.16-08-019 Ordering Paragraph 10. This forecast also includes minimal budget for existing non-third-party qualifying programs (both PG&E-implemented and vendor-implemented programs). PG&E is extending and continuing budget for select vendor-implemented existing programs to ensure portfolio flexibility to address impacts from the COVID-19 pandemic and ensure customer coverage until the commercial programs from wave two of the local third-party resource program solicitation are launched in 2021.

C. COVID Considerations

PG&E has observed the following trends in the residential and non-residential sectors of its EE portfolio in response to the COVID-19 pandemic:

Residential
- Residential customers want tips on how to save energy as well as information on home energy usage, high bill alerts, and EE programs.
- The majority of residential sector savings are coming from Behavior programs (HER and HEC) which have seen no negative impacts to forecast due to pandemic.

- Hard-to-reach (HTR) and Disadvantaged Community (DAC) Direct Install (DI) Programs experience installation challenges when Shelter-in-Place is in effect (customers and contractor shave to be safe and follow local/state guidelines).

Non-Residential
- Some industries such as grocery, laboratory, high tech, data centers, and communications have been positively impacted.
- Many commercial industries have been negatively impacted (e.g. restaurants, hospitality, retail, etc.).
- Banking industry forecasts reduced the pool of lending capital available for EE project investment, credit-worthy customers, and construction/development of projects
- Reduced tax revenues and diversion of funds will support public health
- Federal and state funding reductions trickle down to local governments, schools, and education, particularly for EE investments.

PG&E is proactively increasing communication and marketing to meet Residential customers' demands for more energy saving information. Additionally, PG&E will actively monitor performance across its portfolio to support meeting customer needs, which may result in increased budget for the same/similar levels of savings. PG&E also notes there will be an opportunity to address planning and forecast adjustments in the upcoming contract negotiations for commercial and residential programs through PG&E's local third-party solicitation.

D. Cost-Effectiveness Challenges

As noted in Section A, PG&E is forecasting a portfolio TRC of 0.93 without C&S or market effects for 2021. PG&E's 2021 portfolio reflected a marked improvement in cost-effectiveness relative to its 2020 ABAL forecasted TRC of 0.71 without C&S or market effects.[11] However, PG&E's portfolio still faces cost-effectiveness challenges including the diminished availability of high-volume measures with positive net benefits, the downward trend of avoided costs, and the inclusion of non-resources programs and costs in PG&E's portfolio that must be offset by resource program benefits. As a result of the cost-effectiveness challenges below, PG&E is not forecasting a cost-effective portfolio in 2021; PG&E notes that its portfolio cost-effectiveness will likely be further impacted by COVID-19 pandemic impacts during the course of portfolio implementation.

Diminished Availability of High-Volume, Positive-Net-Benefit Measures
PG&E's recent portfolios through 2019 were heavily reliant on programs such as Primary Lighting to contribute significant positive net benefits.[12] Historically, these high-volume

[11] Advice 4136-G/5627-E filed September 3, 2020, and Advice 4136-G-A/5627-E-A, filed November 15, 2019. Non-standard disposition of Advice 4136-G/5627-E and Advice 4136-G-A/5627-E-A dated December 20, 2019 and issued on December 24, 2019.
[12] Net TRC Benefits = Benefits – TRC Costs

measures with positive net benefits have been critical to bringing in enough portfolio TRC benefits to offset the multitude of TRC costs in the portfolio. While the Residential Lighting savings potential and associated positive net benefits were eliminated from incentive programs, these savings have been absorbed by the C&S programs. The C&S absorption of measures that were previously highly cost-effective in incentive programs has outpaced the creation of cost-effective opportunities in incentive programs. This has contributed to the challenges in achieving a cost-effective portfolio without the inclusion of C&S benefits.

Downward Trend of Electric Avoided Costs

Electric avoided costs comprise a majority of PG&E's energy-efficiency portfolio benefits, and the downward trend in the value of electric avoided cost benefits since 2017 has presented a significant challenge to achieving a cost-effective portfolio. Although average electric avoided cost benefits have increased with the 2020 avoided cost update[13] relative to the 2019 avoided cost update, mid-day electric avoided cost benefits have decreased substantially relative to pre-2017 avoided costs, resulting in fewer avoided cost benefits realized for a given kilowatt-hour of electricity saved in the EE portfolio.

Non-Resource and "Policy-Driven" Programs

The IOUs are expected to fund activities outside of EE resource acquisition such as non-resource (e.g. WE&T) and policy programs focused on policy objectives (e.g. social equity programs such as those aimed at serving HTR, DAC and market transformation programs designed to achieve long-term EE savings impacts in support of state climate goals). However, these programs do not produce immediately quantifiable cost-effective savings while contributing to portfolio costs in the threshold portfolio TRC calculation. EE portfolios are expected to fund these activities in addition to programs focused on EE resource acquisition, while also delivering on energy savings goals, cost-effectively, and within budget.[14] However, non-resource programs may not necessarily play any role in achieving energy savings goals. This is because there is often no clear way to directly measure the amount of energy savings from non-resource programs (e.g. workforce education and training programs).

In addition to the non-resource programs mentioned above, PG&E's portfolio administrator costs required to run its EE portfolio are also included in the threshold portfolio TRC calculation and must be offset by resource acquisition program benefits. While PG&E's overall EE budget has decreased substantially since 2019, its portfolio administrator costs do not scale downward at the same proportion as its program budget, and thus comprise a larger share of its EE portfolio than in prior program years.

[13] Resolution E-5077 adopted updates to the avoided cost calculator for use in demand-side distributed energy resources cost-effectiveness analyses.

[14] D.18-05-041 Findings of Fact 16

1. Portfolio Strategies to Boost Cost-Effectiveness in 2021

Portfolio Management and Balancing

PG&E is pursuing portfolio management tactics to address cost-effectiveness in its portfolio. PG&E has placed a strong emphasis on cost-effective programs, while encouraging innovative and market-driven solutions through its third-party solicitations. As PG&E transitions its portfolio towards the ultimate 60% outsourcing target, it has prioritized the introduction of new local and statewide third-party programs over maintaining existing programs. In order to optimize and balance the portfolio, PG&E is also managing budget allocations for activities outside of EE resource acquisition to mitigate against the negative net benefits incurred by these expenditures in the portfolio. Lastly, PG&E intends to monitor the impact of its statewide programs on cost effectiveness. While PG&E is the largest proportional load share contributor amongst the IOUs for statewide programs, it is only the lead for two resource-acquisition statewide programs,[15] and therefore will be reliant on the other Lead IOUs to deliver cost-effective savings through their third-party implemented programs. PG&E will fund statewide programs as required[16] and therefore receive energy savings credit based on this funding contribution. Should those programs underperform, PG&E will need to re-balance and adjust for that underperformance within the program year by relying more on its local resource programs.

Responding to Changing Market and Regulatory Conditions

Many of the market and regulatory conditions under which PG&E’s EE portfolio operates are outside of its control. Thus, PG&E is focusing on opportunities relatively within its control to respond to those inevitable changing conditions. PG&E will continue to actively participate in regulatory proceedings that may be impactful to cost effectiveness and long-term success of the EE portfolio. Additionally, in anticipation of (a) market or regulatory conditions that may substantially impact programs, and (b) opportunities to monitor ongoing program performance, PG&E will continue annual program reviews and will realign programs as necessary. Lastly, as customers seek on-bill financing support for their projects amidst the current economic uncertainty, PG&E has instituted cost-effectiveness requirements for large on-bill financing projects to help balance customer and portfolio cost-effectiveness needs.

Portfolio Administrator Activities

Acting as a portfolio administrator of a majority-outsourced portfolio necessitates strong QA/QC in the selection of those third-party programs via solicitations and for program performance once launched. PG&E will continue to provide critical oversight activities to ensure that ratepayer funds are prudently used. PG&E will ensure that savings claims of third-party implementers are reasonable, accurate, and in compliance with CPUC policy. PG&E expects this responsibility to increase with the expansion of third-party implemented programs. QA/QC program performance and ex ante/ex post alignment.

[15] New Construction and Institutional Partnerships (State of CA, Department of General Services, and Department of Corrections and Rehabilitation)

[16] D.18-05-41 OP 22

Additionally, PG&E is aligning stakeholder interests on cost-effective offerings and projects through contract terms that encourage performance-based payments. To facilitate this, PG&E is investing in IT system changes to enable effective contract management.

E. Cost Recovery

1. Collection of PG&E's 2021 EE Budget in Rates

The PG&E energy-efficiency budget for 2021 cost recovery purposes upon approval of this advice letter is [TBD],[17] which includes the estimated unspent and uncommitted carryover balance for program year 2020 discussed in Section III.F. The energy efficiency budgets for PG&E's 2021 cost recovery related to MCE, BayREN, and 3C-REN will be based upon Commission approval of the budgets in their 2021 ABALs, including the CPUC portion of the REN and CCA EM&V budgets. PG&E will collect from customers the combined total of PG&E, MCE, BayREN, and 3C-REN's cost recovery budgets.

The allocation of the authorized 2021 budget for electric and gas cost recovery will be based on the electric/gas split attributed to the most recent Commission-approved program forecast. If the Commission approves the electric/gas split of [TBD]%/ [TBD]% associated with the 2021 EE program forecast in this advice letter, PG&E will apply this electric/gas split for 2021 cost recovery purposes. If the Commission does not approve the electric/gas split associated with the 2021 EE program forecast in this advice letter, PG&E will default to its last approved electric/gas split of 70%/30% from the 2020 ABAL.[18]

2. Collection of PG&E's 2021 Demand Response portion of Integrated Demand-Side Management (IDSM) Budget in Rates

Table 4: Authorized Demand Response IDSM Funding in 2021 Rates

Category	PG&E Electric Demand Response Funds[19]
Energy Efficiency	$1,000,000
Demand Response	$8,000,000
Total PG&E	**$9,000,000**

[17] Revenue Fees and Uncollectible Account Expenses (RF&U) are not included in this cost recovery budget but will be added to electric funding to determine the revenue requirement when recovered in rates through the Annual Electric True-up (AET). This cost recovery budget includes benefits burdens.

[18] Advice 4136-G/5627-E filed September 3, 2020, and Advice 4136-G-A/5627-E-A, filed November 15, 2019. Non-standard disposition of Advice 4136-G/5627-E and Advice 4136-G-A/5627-E-A dated December 20, 2019 and issued on December 24, 2019.

[19] Administrative Law Judge's Ruling Providing Guidance for the 2012-2014 Demand Response Applications, Rulemaking (R.) 07-01-041, August 27, 2010 directed that future authority and funding for the demand response portion of the Integrated Design-Side Management activities be considered in EE proceedings starting with the EE applications for 2013-2015. These funds were approved in D.18-05-041, OP 10.

3. Electric and Gas Benefit Split

[TBD]

F. Unspent Funds

1. PG&E Prior Years' Unspent Funds

Table 5 illustrates PG&E's unspent funds for prior years' program cycles. Balances are through July 2020. These data are also presented in the Appendices on Table 6: Committed Energy Efficiency Program Funding Not Yet Spent, and Table 7: 2019 Authorized and Spent/Unspent Detail. As of July 2020, PG&E estimates that approximately $10 million of funds may be unspent and uncommitted, and available to offset 2021 EE revenue collections.

Table 5: Prior Years' Unspent Funds as of July 2020

	PY2013-2015	PY 2016	PY 2017	PY 2018	PY 2019	PY 2020	Totals
Unspent & Committed							
EM&V	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Financing Pilots	TBD	TBD	TBD	TBD	TBD	TBD	TBD
BayREN	TBD	TBD	TBD	TBD	TBD	TBD	TBD
MCE	TBD	TBD	TBD	TBD	TBD	TBD	TBD
3C REN	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Total	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Estimated Unspent & Uncommitted for 2020 Offset							
Utility Program Funds	$0	$0	$0	$0	TBD	$10,000,000	TBD

G. 2021 Program Changes

This section identifies changes to PG&E's proposed programmatic activity in compliance with the Rolling Portfolio Decision[20] and Business Plan Decision.[21] PG&E's 2021 portfolio forecast represents significant budget adjustments to existing programs across the portfolio sectors as well as program closures as PG&E transitions to a largely outsourced portfolio with the introduction of new local third-party and statewide programs.

Program Closures
[Program closures TBD]

Program Budget Changes

[20] D.15-10-028, p. 60.
[21] D.18-05-041

[Program details and budget changes TBD]

New Programs
[New program details TBD]

G. EM&V

PG&E proposes a PG&E EM&V budget of [TBD], consistent with the 4% EM&V budget cap originally adopted in D.09-09-047 and upheld in subsequent EE budget Decisions.[22] D.16-08-019 established grounds to revise the allocation of EM&V fund split between Commission and IOU EM&V efforts, beginning after the EE Business Plans are approved by the Commission, to at least 60% reserved for Commission staff evaluation efforts and up to 40% for PAs.[23] PG&E will allocate 72.5% of EM&V funds for Commission EM&V efforts and 27.5% for PG&E EM&V efforts. Table 6 presents the EM&V allocations for PG&E, BayREN, MCE, and 3C-REN.

Table 6: 2021 EM&V Budget

PA	Total PA Budget without EM&V	EM&V Total [1]	EM&V CPUC Portion [2]	EM&V PA Portion	Total PA Budget with EM&V
PG&E [3]	TBD	TBD	TBD	TBD	TBD
BayREN [4]	TBD	TBD	TBD	TBD	TBD
MCE [5]	TBD	TBD	TBD	TBD	TBD
3C-REN [6]	TBD	TBD	TBD	TBD	TBD

[1] The EM&V total amount (equal to the sum of CPUC and PA portions) is assumed to be 4% of the PA's total budget with EM&V.
[2] For BayREN, MCE, and 3C-REN, the EM&V CPUC portion was calculated by subtracting the PA's portion from the EM&V total.
[3] Assumes a total PG&E EM&V split of 72.5% CPUC / 27.5% PA
[4] BayREN total budget without EM&V and EM&V PA portion taken from [TBD].
[5] MCE total budget without EM&V and EM&V PA portion taken from [TBD].
[6] 3C-REN total budget without EM&V and EM&V PA portion taken from [TBD]., assuming PG&E's budget portion is 45.6%.

H. Metrics

Pursuant to D.18-05-041, PG&E reported on sector-level metrics and their associated targets for program years 2017, 2018, and 2019 as part of the 2017, 2018, and 2019 EE Annual Report filings filed on May 1, 2018, May 1, 2019, and May 1, 2020, respectively. They can be found in spreadsheet form on the CPUC's data reporting website, Energy

[22] D.10-04-029, D.12-05-015, D.14-10-046, D.15-10-028, D.16-08-019
[23] D.16-08-019, OP 16.

Efficiency Statistics (EEStats),[24] by filtering documents for the "Annual" Report Category and "Narrative & Spreadsheet" Report Type.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than September 21, 2020, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via e-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was

[24] http://eestats.cpuc.ca.gov/Views/Documents.aspx

sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

PG&E requests that the Commission approve its 2021 spending budget of [TBD] and its 2021 cost recovery budget of [TBD] through a non-standard disposition effective January 1, 2021. PG&E additionally requests that the Commission approve the forecasted 2020 electric/gas split of [TBD]%/[TBD]% associated with its 2021 EE program forecast for cost recovery budget allocations effective January 1, 2021. This will allow PG&E to recover gas and electric costs in amounts that more appropriately match the new measure potential in 2021.[25]

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service lists for R.13-11-005, A.17-01-013 et al. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter filings can also be accessed electronically at: http://www.pge.com/tariffs/.

/S/
Erik Jacobson
Director, Regulatory Relations

Attachments
Attachment 1 – Joint IOUs Statewide Funding Allocations
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[25] The 2021 ABAL forecasted electric/gas split is [TBD]%/ [TBD]%, compared with the 70%/30%electric/gas split approved in the 2020 ABAL that is the basis of cost recovery budget allocation in 2020.

cc: Peter Franzese, Energy Division
Service List R.13-11-005
Service List A.17-01-013 et al.