

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

Item # 24

ID #11452

RESOLUTION E-4518

August 23, 2012

R E S O L U T I O N

RESOLUTION E-4518: Certification of Marin Energy Authority's 2012 Energy Efficiency Program Administration Plan pursuant to Public Utilities Code Section 381.1(f).

PROPOSED OUTCOME: This Resolution certifies Marin Energy Authority's 2012 Energy Efficiency Program Administration Plan, submitted pursuant to Public Utilities Code Section 381.1(e) and (f), and orders Pacific Gas & Electric Company to transfer up to \$428,270 in funds collected from Marin Energy Authority customers through nonbypassable charges authorized by the Commission for cost-effective energy efficiency and conservation programs.

ESTIMATED COST: \$0 incremental cost to PG&E ratepayers

Summary

Senate Bill (SB) 790 (Stats. 2011, ch. 599 (Leno)) modified Public Utilities Code Section 381.1,¹ giving CCAs the option to "elect" to become an administrator for cost-effective energy efficiency (EE) and conservation programs, subject to Commission certification of a plan approved by the CCA's governing board. Pursuant to that section, Marin Energy Authority (MEA) submitted a 2012 Energy Efficiency Program Plan ("MEA plan") requesting \$428,270 to administer programs for their customers.

¹ Henceforth, all code references are to the Public Utilities Code.

This resolution certifies MEA's plan according to the criteria set forth in Section 381.1(f) (1)-(6). The implementation process we utilize here is on an interim basis without prejudice to any future Commission decision-making on implementation of SB 790.

The amount that MEA will be eligible to receive pursuant to this resolution is capped at \$428,270. The actual amount will depend on actual sales and energy efficiency funds collected by Pacific Gas and Electric Company (PG&E) from MEA customers. The actual amount is to be calculated as 14% of total energy efficiency funds collected by PG&E from MEA customers. Initially, we had estimated that percentage to be 15%, but pursuant to comments received, we have determined that Zero Net Energy Pilot and Integrated Demand Side Management programs should be treated as statewide programs and excluded from the calculation. This exclusion reduces the percentage of funds MEA is eligible for to 14%. Based on sales forecasts, we estimate that MEA will be eligible to receive about \$379,249 instead of our earlier estimate of \$403,744. However, if actual sales exceed the forecast, MEA could receive up to the cap of \$428,270.

PG&E is ordered to transfer to MEA all eligible monies collected from MEA customers, after subtracting amounts dedicated to statewide and regional programs, not to exceed \$428,270, for purposes of executing the MEA plan.²

Background

Assembly Bill (AB) 117 (Stats. 2002, ch. 838 (Migden)) added Sections 331.1, 366.2, and 381.1 to the Public Utilities Code, enabling cities and/or counties to implement a Community Choice Aggregation (CCA) program. The CCA program allows communities to offer procurement service to electric customers within their political boundaries.

² Procedures for how CCAs may be able to apply for EE program funding for 2012 and 2013-2014 have been promulgated via an ALJ Ruling, dated June 20, 2012, in the R.09-11-014 docket (Administrative Law Judge's Ruling Regarding Procedures for Local Government Regional Energy Network Submissions for 2013-2014 and for Community Choice Aggregators to Administer Energy Efficiency Programs (ALJ's Ruling on REN and CCA Administration of EE)), linked here:

<http://docs.cpuc.ca.gov/efile/RULINGS/169213.pdf>. Comments and reply comments are sought from parties by August 10 and 17, 2012 on the proposals set forth in the ruling.

SB 790 modified Section 381.1 modifying subsection (a) and adding subsections (d) –(g). Subsections (e) and (f) give CCAs the option to “elect” to become an administrator for cost-effective Energy Efficiency (EE) and conservation programs, subject to Commission certification of a plan approved by the CCA’s governing board.

Section 381.1(e) states:

“The impartial process established by the commission shall allow a registered community choice aggregator to elect to become the administrator of funds collected from the aggregator's electric service customers and collected through a nonbypassable charge authorized by the commission, for cost-effective energy efficiency and conservation programs, *except those funds collected for broader statewide and regional programs authorized by the commission.*” (Emphasis added)

Section 381.1(f) states:

“A community choice aggregator electing to become an administrator shall submit a plan, approved by its governing board, to the commission for the administration of cost-effective energy efficiency and conservation programs for the aggregator's electric service customers that includes funding requirements, a program description, a cost-effectiveness analysis, and the duration of the program. The commission shall certify that the plan submitted does all of the following:

- (1) Is consistent with the goals of the programs established pursuant to this section and Section 399.4.
- (2) Advances the public interest in maximizing cost-effective electricity savings and related benefits.
- (3) Accommodates the need for broader statewide or regional programs.
- (4) Includes audit and reporting requirements consistent with the audit and reporting requirements established by the commission pursuant to this section.
- (5) Includes evaluation, measurement, and verification protocols established by the community choice aggregator.

- (6) Includes performance metrics regarding the community choice aggregator's achievement of the objectives listed in paragraphs (1) to (5), inclusive, and in any previous plan."

On February 3, 2012, MEA submitted a plan to the Energy Division requesting to administer energy efficiency program funding for the 2012-2015 timeframe under Section 381.1. MEA's original funding request appeared to be based on an assumption that CCAs could seek to administer funds under *both* Sections 381.1(a)³ and 381.1(e) and (f)⁴ via the "election" option afforded under 381.1(e) and (f) only. The original submission was for 2012-2015 and envisioned providing energy efficiency services to customers throughout Marin County, including those customers not served by MEA who are currently customers of PG&E. Energy Division performed a cursory review of MEA's original submission and determined that modifications would be needed in order to effectively respond within the statutory framework and current IOU energy efficiency budget cycles.

After consulting with the Commission's Energy Division, MEA mailed a letter addressed to the Commission's Energy Division Director, dated June 5, 2012, clarifying that they wished to revise their request to seek funding only under the Section 381.1(e) and (f) election option. After further consultation with Commission staff, MEA amended its drafted plan to seek funding for 2012 only, in order to coincide with the conclusion of the 2010-2012 IOU energy efficiency budget cycle. MEA also amended its drafted plan to address several deficiencies identified by Commission staff.

On June 20, 2012, ALJ Fitch issued a ruling in R.09-11-014 regarding procedures for CCAs to become administrators of EE programs through the Section 381.1(a) application process and through the Section 381.1 (e) and (f) election option. The ruling requested comments from parties to refresh the record on the subject of how CCAs will be able to participate in administering energy efficiency

³ Section 381.1(a) enables a CCA to apply to administer a potentially larger pool of funds, including for programs delivered to non-CCA customers and for statewide and regional programs. However, the approval of such a program proposal is discretionary by the Commission, which must consider "the value of program continuity and planning certainty and the value of allowing competitive opportunities for potentially new administrators," and shall "weigh the benefits of the party's proposed program" and ensure that it meets certain criteria.

⁴ Section 381.1(e) and (f) enables a CCA to elect to administer a more restricted pool of funds, excluding funds collected for non-CCA customers and for statewide and regional programs.

programs on behalf of the customers and/or geographic areas they serve. In the meantime, the ruling directed CCAs on how to make such requests “while the permanent procedures for program cycles beginning in 2015 are under consideration and finalized by the Commission.”⁵

On June 22, 2012, MEA submitted its 2012 plan, approved by its governing board on June 20, 2012, to the Energy Division Director and served it on the R.09-11-014 service list, pursuant to the procedures specified in the June 20, 2012 ALJ ruling.

Notice

Pursuant to the June 20, 2012 ALJ ruling, MEA states that it served a copy of its letter and 2012 plan to the Director of the Energy Division requesting certification of its plan to the R.09-11-014 service list, the assigned Commissioner, and the assigned ALJ for R.09-11-014.

Discussion

The Section 381.1(a) application option and the Section 381.1 (e) and (f) election option require different types and levels of Commission review, which are reflected in the June 20, 2012 ALJ ruling. We find that the resolution process is a reasonable and appropriate procedure for certifying MEA’s EE plan submitted pursuant to Section 381.1(f) , while permanent procedures for all CCAs are under consideration for adoption by the Commission in R.09-11-014 or a successor proceeding.

This resolution reviews MEA’s election option and certifies MEA’s plan without prejudicing any future Commission decision-making on implementing Section 381.1 or SB 790. The Commission’s resolution process used here meets all of the requirements of Section 381.1 in order to determine funding levels and certify MEA’s plan for 2012, as set forth below.

The IOUs appear to conflate the application and elections options available under Section 381.1 for CCAs to administer EE programs in several instances in their comments (e.g., comments on audit and reporting requirements, funding sources, and process requirements.) The two options are, however, quite distinct from each other. The application option was established in 2002 by AB 117. The election option was added to Section 381.1 in 2011 by SB 790. Pursuant to SB 790,

⁵ ALJ’s Ruling on REN and CCA Administration of EE at p. 2.

the application option available to “any” prospective non-IOU third-party energy efficiency administrator is “subject to an aggregator’s [CCA’s] right to elect to become an administrator pursuant to [the election option under] subdivision (f).” (Section 381.1(a).) SB 790 thus subordinates the Commission’s authority to approve a third-party’s application to a CCA’s right to elect to administer energy efficiency programs to its customers. This new language underscores the two distinct options available to a CCA seeking to administer energy efficiency funds and highlights the Legislature’s desire to greatly simplify the process by which CCAs can administer EE programs for their own customers.

Description of MEA’s Plan

MEA’s plan includes the following elements and schedule for what is described as “Phase 1” (Aug – Dec 2012). The longer term MEA plan, considered “Phase 2,” was part of the original February 3, 2012 plan and extends out to March 2015. The post-2012 (Phase 2) program activities are provided in order to place MEA’s 2012 (Phase 1) request in context.

Phase I (August 2012 – Dec 2012)

1. Direct Service Element
 - The Multi-Family Energy Efficiency Project
2. Support for Existing Programs
 - Support for Energy Upgrade California (expanded to Multi-Family)
 - Coordination and Outreach with Marin Energy Watch Partnership
3. Financing Element: Pilot On-Bill Repayment for Multi-Family Energy Efficiency Improvements
 - Plan for Property Assessed Clean Energy in 2013
 - Plan for Standard Offer for Energy Efficiency Procurement

Phase 1 Budget: \$428,270

Phase 1 Savings: The Multi-Family Energy Efficiency Project is projected to achieve a reduction 719,474 kWh during the initial 5 months of the program. The program is also projected to result in 45 kW of peak demand savings during that period.

Phase II (Jan 2013 – March 2015) – *Informational Only*

1. Additional Direct Service Elements

- Continuance of Multi-Family Energy Efficiency Program
- Convenience Store & Small Grocer Energy Efficiency Deployment
- Restaurant Energy Efficiency Project

2. Support for Existing Programs

- Support for Energy Upgrade California (expansion to Small Commercial Programs)
- Coordination and Outreach with Marin Energy Watch Partnership

3. Financing Element:

- Property Assessed Clean Energy
- On-Bill Repayment for Energy Efficiency Improvements (expanded to small commercial)
- Pilot Standard Offer for Energy Efficiency Procurement

Funding Determination

First, it is necessary to establish whether MEA's funding request is within the forecasted maximum amount of funds MEA would be eligible to collect. While the Commission works to formally adopted rules for all CCAs in its pending proceeding, we will use the formula proposed in the June 20, 2012 ALJ ruling to consider MEA's plan, as follows:

CCA maximum funding = Total electricity energy efficiency nonbypassable charge collections from the CCA's customers – (total electricity energy efficiency nonbypassable charge collections from the CCA's customers * % of the applicable IOU portfolio budget that was dedicated to statewide and regional programs in the most recently authorized program cycle).

Total EE Collections from MEA Customers

The Commission has determined, via data request submittals to both PG&E and MEA, the actual and forecasted amounts of non-bypassable charges⁶ likely to be

⁶ For 2012, PG&E has two non-bypassable energy efficiency charges: (1) Procurement Energy Efficiency Revenue Adjustment Mechanism (PEERAM), and (2) Public Purpose Program Revenue Adjustment Mechanism (PPPRAM).

collected from MEA's customers⁷ in 2012 to fund energy efficiency programs (See Appendix A).

Section 381.1(e) speaks only to the source of a CCA's fund ("...funds collected from the aggregator's electric service customers and collected through a nonbypassable charge authorized by the commission"), but it is silent as to whether the period of fund collections that a CCA is eligible to receive must be the same as the period in which a CCA plans to spend these funds to administer programs. In MEA's case, MEA stated in its February 3, 2012 draft that they would begin implementing programs in April 2012. MEA's submitted plan, served on parties in R.09-11-014 June 22, 2012, states that MEA plans to begin implementing programs as of August 2012.

Funding collection and program periods do not always correspond and we see no compelling reason to ensure they do in consideration of MEA's program proposal. Notably, the IOUs' collection periods and their energy efficiency funds expenditure periods do not necessarily match – in fact, the IOUs often collect more money than they spend in the early years of an energy efficiency program cycle, and conversely, often collect less money than they spend in the latter years as energy efficiency program expenditures ramp up.

Given that the law is silent on the matter, the Commission finds that it is reasonable to approve MEA's request for the collections period from February 3, 2012 through the end of 2012. We do this because we do not wish to limit the amount of funds MEA is eligible to receive based on the length of time consumed by the Commission's review or regulatory process. The changes in MEA's plan from the original February draft to the June submittal were part of the normal review and revision process that takes place, just as it does for utility filings. Indeed, the MEA plan could be considered an unusual case because (1) SB 790 only recently passed last year, (2) the Commission has yet to establish formal procedures to implement the law, and (3) the Commission has yet to receive budget authorization to hire staff to implement the bill.

In its comments on the draft resolution, PG&E states that the period of time used to calculate MEA's share of funds should be based on MEA's proposed 2012 program period – August through December 2012 – and not on the February

⁷ "MEA's customers" are those customers that have not opted-out – or that MEA forecasts will not opt-out – of Marin Clean Energy service in 2012.

through December 2012 timeframe as described in the draft resolution. PG&E argues that MEA did not submit its 2012 plan until June, and that its February plan covered the period 2012-2015, which was never served on the interested parties.

We are not persuaded by PG&E's arguments on this particular issue. Nothing in the statute requires that CCAs administering EE programs pursuant to the election option are entitled only to funds collected from the date the Commission certifies the CCA's plan. The Commission is therefore able to order that PG&E transfer the EE funds collected from MEA customers going back to a date it deems reasonable for the plan period.

As discussed above, we conclude that it is reasonable to use the February through December 2012 time period as the basis for calculating MEA's share of funds. MEA's original plan was submitted in February and we do not wish to limit the amount of funds MEA is eligible to receive based on the length of time consumed by the Commission's review of MEA's plan.

Thus, MEA should be eligible to administer funds collected from February 3, 2012 through December 31, 2012. The total amount of EE surcharges forecasted to be collected from MEA's customers during this period is \$2,702,520 (See appendix B). As discussed below, MEA would be eligible to collect some percentage of this amount from PG&E, after subtracting out collections to support statewide and regional programs.

Funding Exclusions

PU Code 381.1 (e) states:

The impartial process established by the commission shall allow a registered community choice aggregator to elect to become the administrator of funds collected from the aggregator's electric service customers and collected through a nonbypassable charge authorized by the commission, for cost-effective energy efficiency and conservation programs, *except those funds collected for broader statewide and regional programs authorized by the commission.* (Emphasis added)

In determining which programs were considered "regional" and "statewide" in nature, we find it reasonable to adopt the funding formula and definitions proposed in the June 20, 2012 ALJ ruling. We emphasize that this approach is interim and subject to change pending the outcome of the formal proceeding. The definitions provided in that ruling are as follows:

“Regional Programs” - Programs offered to all eligible customers throughout an individual IOU’s service territory in which a CCA is offering service, but not necessarily offered in other IOU service territories. This includes state and institutional government partnerships. This does not include any programs that are offered only in a geographic subset of an IOU territory.⁸

“Statewide programs” - Programs, as defined and designated by the Commission, that are offered throughout the four investor-owned utilities (IOUs’) service territories on a generally consistent basis. Evaluation, Measurement and Verification budgets are included in statewide programs, as these budgets are overseen by Commission staff across all four IOUs on a consistent basis.⁹

In order to calculate the funding exclusion, the Commission reviewed PG&E’s most recently approved 2010 – 2012 portfolio budget, as authorized by D.09-09-047 and modified by PG&E AL 3235-G-A/3901-E-A, effective February 10, 2012, and sorted programs which, according to program rules, met the definitions in the June 20, 2012 ALJ ruling. Though not specified in the ALJ ruling, we categorize the on-bill financing program as a regional program, for purposes of the CCA funding calculation, because it is offered throughout PG&E’s service territory.¹⁰ Thus defined, the statewide and regional program budgets were determined as a percentage of the overall portfolio, and the eligible collections were calculated according to the formula above. Appendix B to this resolution breaks down PG&E’s portfolio budgets into relevant funding categories, and calculates the percentage of PG&E’s total portfolio budget attributable to statewide and regional programs. Appendix C to this resolution breaks down PG&E’s third-party programs into those defined as regional (because their program eligibility rules make no geographical restrictions) and non-regional.

⁸ ALJ’s Ruling on REN and CCA Administration of EE at p. 11.

⁹ Ibid.

¹⁰ We note that the on-bill financing was approved as a “local program” as that term is in PG&E’s Application 08-07-031, approved as modified in D.09-09-047. But, because the on-bill financing program meets the definition of a regional program as set forth in this resolution, we categorize it as such herein.

The amount that MEA will be eligible to receive pursuant to this resolution is capped at \$428,270. The draft resolution contained initial calculations indicating that of the \$2,702,520 energy efficiency amount estimated to be collected from MEA's customers during the February-December 2012 period, MEA could be eligible to receive \$403,744 (15% of PG&E's portfolio budget), as 85% of PG&E's total portfolio is dedicated to fund statewide and regional programs. Pursuant to comments received, we have determined that Zero Net Energy Pilot and Integrated Demand Side Management programs should be treated as statewide programs and excluded from the calculation. This exclusion reduces the percentage of funds MEA is eligible for from 15% to 14%. Based on sales forecasts, we estimate that MEA will be eligible to receive about \$379,249 instead of our earlier estimate of \$403,744 due to the exclusion of Zero Net Energy Pilot and Integrated Demand Side Management programs. However, if actual sales exceed the forecast, MEA could receive up to the cap of \$428,270.

Via data request to PG&E, the Energy Division determined that for the current program cycle (2010 - 2012) there is an anticipated unspent budget of \$457,284 from PG&E's Government Partnership program.¹¹ Additionally, PG&E anticipates that the on-bill financing program will have \$2,618,518 of unspent budget by the end of the budget cycle. Therefore, PG&E is expected to have funds available to transfer to MEA.

In its comments on the draft resolution, PG&E states that its Zero Net Energy Pilot and Integrated Demand Side Management programs are regional programs, in accordance with the ALJ June 20 2012 ruling. PG&E further states the draft resolution erroneously identifies PG&E's third party programs as not statewide or regional. PG&E states all of PG&E's non-government third party implemented programs are regional programs.

In light of PG&E's comments on the draft resolution, we reviewed our initial determinations and we agree with PG&E that the Zero Net Energy Pilot and Integrated Demand Side Management programs have a statewide emphasis and scope. We disagree, however, with PG&E's claim that all their third-party programs are regional in nature. PG&E's program descriptions for third-party programs classified as "local" (not regional or statewide) distinctly identify a specific targeted local area of scope.

¹¹ PG&E data request response, EEGA 1944 (ED 151).

The eligible funding percentage for MEA has been revised to exclude the percentage of the portfolio represented by Zero Net Energy Pilot and Integrated Demand Side Management programs. The bottom line effect is a roughly 1% decrease in funds available for MEA's energy efficiency programs from 15% to 14% and a corresponding decline in projected funding from \$403,744 to \$379, 249 (see Appendix B)

Review of Plan

Pursuant to Section 381.1(f), the Commission must certify that the MEA plan meets six criteria, specified in paragraph (f)(1)-(6) of the statute. Accordingly, we review MEA's plan and make findings on each criteria in the sections below.

1. *Is consistent with the goals of the programs established pursuant to this section [Section 381.1] and Section 399.4.*

Section 381.1 encourages the administration of cost-effective energy efficiency and conservation programs by CCAs and other non-IOU administrators. Section 399.4(a) states that prudent energy efficiency investments should continue to be made in order to "produce cost-effective energy savings, reduce customer demand, and contribute to the safe and reliable operation of the electric distribution grid." Similar to PG&E's energy efficiency programs currently authorized by the Commission to pursue these goals, it is reasonable to expect that MEA's Multifamily Energy Efficiency Project (MFEEP) program (and any future program activities) will do the same.

Further, Section 399.4(c) states that, in evaluating energy efficiency investments, the Commission shall:

"ensure that local and regional interests, multifamily dwellings and energy service industry capabilities are incorporated into program portfolio design and that local governments, community-based organizations, and energy efficiency service providers are encouraged to participate in program implementation, where appropriate."

Because MEA's plan includes only one program - the MFEEP - it cannot be characterized as a "portfolio" of programs, and, therefore, many of the requirements of this section are moot. Nevertheless, MEA's plan actively includes the local and regional interests of all the cities within Marin County. By virtue of the fact that MEA is a community-based local government agency, its

plan to administer energy efficiency programs for its community is expected to meet the goals of Section 399.4(c). MEA's plan states that they will capitalize on the efforts of the Marin City Community Development Agency, Marin Energy Management Team, Marin Energy Watch PG&E Partnership, Sonoma County Energy Independence Program, Marin Employment Connection, and the Marin Workforce Investment Board, among others. The plan also promotes multi-family strategies and targets outreach to implementation contractors in the multifamily market.¹²

Therefore, we find that MEA's plan meets the Section 381.1(f)(1) criteria.

2. Advances the public interest in maximizing cost-effective electricity savings and related benefits

MEA states that it performed a cost-effectiveness analysis consistent with the Standard Practice Manual and the most currently published E3 calculator and Database on Energy Efficiency Resources (DEER).¹³ These are Commission-approved methods and tools for assessing cost-effectiveness. MEA provides detailed results of the cost-effectiveness analysis in Appendix B of their plan. The multi-family program has a Total Resource Cost (TRC) result of 0.82 and a Program Administrator Cost (PAC) result of 1.73, when including the administrative costs of hiring one full-time Energy Efficiency Program Coordinator staff position.¹⁴

MEA justifies the cost-effectiveness of its plan, even though the TRC is less than 1.0, because they expect the TRC to improve over time, as they provide additional program services (beyond the multi-family program) in 2013 and beyond, and that this will increase benefits relative to costs. MEA also argues that, because the multi-family program passes the PAC test, it is cost-effective in 2012.

¹² MEA plan at p. 12.

¹³ Id. at p. 10.

¹⁴ Due to an apparent typographical error, there is an inconsistency on page 12 of MEA's plan which states that the multi-family program, including the one full-time MEA staffing position, has TRC = 0.91 and PAC = 2.15. The results in Appendix B of MEA's plan correspond to TRC=0.82 and PAC=1.73 and also correspond to the total requested funding amount, \$428, 270. Therefore, we presume the values on page 12 are erroneous.

Section 381.1(f)(2) requires this Commission to make a finding as to whether MEA's plan "advances the public interest in maximizing cost-effective electricity savings and related benefits," in order to certify (or not) the plan on the basis of whether that condition is met. It is reasonable and appropriate to make this determination by referring to current Commission rules and policies governing energy efficiency cost-effectiveness. As stated in the Energy Efficiency Policy Manual: "This Commission relies on the TRC as the primary indicator of energy efficiency program cost effectiveness, consistent with our view that ratepayer-funded energy efficiency should focus on programs that serve as resource alternatives to supply-side options." Therefore, the fact that MEA's plan does not pass the TRC test is a concern. We cannot certify MEA's plan based on their argument that the PAC test, alone, should be sufficient.

However, the Commission must also take into consideration whether the plan "advances the public interest," not only in maximizing cost-effective electricity savings, but also "related benefits." MEA's plan seeks initial seed funding to establish a program, which, if it succeeds, will advance the public interest. A challenge which MEA (or any CCA seeking to become a program administrator) must overcome is the expenditure of dollars and time it takes to launch its operations as a program administrator, without yet having the resources (and expertise) to fulfill the endeavor. MEA's plan seeks to hire a full-time staff person to develop and refine program designs, participate in CPUC proceedings, and prepare regulatory filings. To the extent that the investment in these "start-up" activities leads to benefits down the road, this is in the public interest.

Further, MEA's plan should be evaluated on the "related benefits" it provides. Among the related benefits, MEA's plan aims to provide participant recruitment, community-based outreach and communications, and workforce development and job creation. The Commission recognized in D.09-09-047 and D.12-05-015 that local governments may, in some cases, be more capable than the IOUs in reaching potential program participants, and increasing uptake of energy efficiency, through local events, communication channels, and strategies catered to their communities. The fact that MEA's plan chooses to initially focus on multi-family dwellings, a "hard-to-reach" market and a goal of Section 399.4, is another related benefit. Finally, compared to PG&E's Multi-family Energy

Efficiency Rebate (MFEER) program which has a projected TRC of 0.89,¹⁵ MEA's multi-family program appears, at least, comparable to the PG&E alternative.

In sum, we find that, under the following particular circumstances of MEA's 2012 plan, it is reasonable to certify that the Section 381.1(f)(2) criteria has been met:

- First, by giving CCAs the option to "elect to become" energy efficiency program administrators, Sections 381.1(e) and (f) appear intended to give CCAs more flexibility to seek program administrator status before the Commission, than would otherwise be the case for "any party" applying for the same under Section 381.1(a) provisions.
- Second, the Commission has yet to adopt permanent policies and procedures governing implementation of Section 381.1(a) and (f). As set forth in the June 20, 2012 ALJ ruling in R.09-11-014 (and relatedly, in Phase 2 of that proceeding), the Commission contemplates addressing these matters in a formal proceeding. But, until such time, our informal rulings on this matter will be provisional and interim.

We caveat, however, that these findings pertain to MEA's 2012 plan only. Any potential future MEA program plans should find ways to maximize cost-effectiveness, and at minimum, exceed a TRC of 1.0, consistent with Commission policy.

In its comments on the draft resolution, San Diego Gas & Electric Company (SDG&E) highlights the Commission's acknowledgement that MEA's plan does not currently meet cost-effectiveness requirements required for approval of IOU energy efficiency program portfolios.

As discussed extensively in this resolution, cost-effectiveness is not viewed in isolation under Section 381.1(f)(2). As such, our determination that MEA's 2012 plan meets the criteria set forth in Section 381.1(f)(2) still stands.

3. *Accommodates the need for broader statewide and regional programs*
MEA's plan describes an intention to accommodate PG&E's Statewide Multifamily Energy Efficiency Rebate (MFEER) program by developing

¹⁵ As per Energy Division analysis of PG&E reported program savings and costs through December 2011. These PG&E reported values are subject to verification and evaluation.

marketing and branding strategies to minimize customer confusion and distinguish between the two programs.¹⁶ MEA also describes an intention to collect data through its evaluation activities to determine if any MEA customers participate in both PG&E's and MEA's multi-family programs.

In its comments on the draft resolution, PG&E describes a need to avoid duplication of existing efforts and to verify eligibility of customers in order to "ensure that MEA is only serving its own customers and that customers have not already be treated by PG&E's Energy Savings Assistance Program." PG&E argues that this resolution should be revised to require MEA to have a process included in its plan that would enable MEA to verify and document eligibility/non-duplication prior to the beginning of its program in August.

PG&E's concern about duplication and verification of eligibility is misplaced because the funding calculation ensures that MEA customers are paying their fair share of any statewide or regional PG&E program that they might potentially participate in. Certification of MEA's plan will not interfere with PG&E's administration of its MFEER, and MEA's plan therefore does accommodate the need for statewide and regional programs.

In the forthcoming 2013-2014 IOU energy efficiency budget application proceeding, we expect the Commission to consider the interactions, and related policy implications, among statewide and regional program activities funded by IOU ratepayers and other CCA-administered programs. While these issues are pending before the Commission, we find the steps MEA states it will take to accommodate statewide and regional programs to be reasonable. Accordingly, we find that MEA's plan meets the Section 381.1(f)(3) criteria.

4. Includes audit and reporting requirements consistent with the audit and reporting requirements established by the Commission pursuant to Section 381.1.

MEA's plan describes its intent to utilize an existing third party to include the MFEEP in its already existing audit and reporting requirements for financial statements and existing generation-side audits. MEA will also submit monthly and annual status reports detailing energy efficiency performance to its Board of Directors. Report categories include customer inquiries, applications, customer audits, contracts, projects, measures, energy/GHG reductions, funding, jobs created, and budget. MEA will provide copies of all reports to Energy Division.

¹⁶ MEA plan at p. 12.

SDG&E states that the resolution should require “adequate provisions to ensure proper after-the-fact performance oversight.” (SDG&E Comments, p. 2.) However, Section 381.1(f)(4) requires only that MEA’s plan “[i]ncludes audit and reporting requirements consistent with the audit and reporting requirements established by the commission pursuant to this section [381.1].” (Emphasis added.)

MEA proposes to submit monthly and annual reports detailing its energy efficiency performance to its Board of Directors. Its reports will include projected and actual cost savings (costs, therms, kw, kwh), measure costs (individual and actual), and incentive levels by project and measure (projected and actual). The reporting components listed here are consistent with existing Commission reporting requirements for energy efficiency programs. MEA proposes to utilize a third party to perform an annual audit of its energy efficiency program by the end of each fiscal year. The results will be released publically and available on MEA’s website. Because the Commission’s energy efficiency proceeding will establish specific audit and reporting requirements for future energy efficiency plans, MEA’s 2012 audit plan is acceptable for the present purposes.

Accordingly, we find that MEA’s plan meets the Section 381.1(f)(4) criteria. When the Commission establishes audit and reporting requirements for CCAs, MEA should be prepared for the possibility of having to provide an audit plan that meets the requirements and format established by the Commission if it intends to seek funds for its future energy efficiency programs.

5. *Includes evaluation, measurement, and verification (EM&V) protocols established by the CCA.*

MEA’s plan describes its intent to utilize the International Performance Measurements and Verification Protocols (IPMVP) when evaluating the MFEEP. These protocols fall into four categories; 1) partially measured retrofit isolation, 2) retrofit isolation, 3) whole building, and 4) calibrated simulation (p. 31 – 32). These protocols are recognized industry standards. MEA proposes a 5th protocol called “Entirely Stipulated Savings.” This protocol is not part of the industry recognized IPMVP and is reserved for instances when measurement and verification of savings is not warranted such as “when the cost of measurement is too high when compared to savings, where parameters preclude accurate measurements, or where the confidence of savings projections are high.” MEA and their evaluator will utilize this protocol in certain cases without any measurement or verification of savings, if warranted.

As Section 381.1(f)(5) defers to the CCA to establish its own EM&V protocols, the Commission's role is limited to certifying that they have been included in the plan, which they have. Therefore, this criterion is met.

In its comments on the draft resolution, PG&E states that MEA's plan lays out its own methods of accounting of the energy reductions attributable to MEA's program. PG&E states that the resolution should be corrected to require MEA's energy efficiency savings to be evaluated using the same CPUC EM&V requirements that apply to other energy efficiency programs.

We decline to make the change suggested by PG&E. As noted above, Section 381.1(f)(5) limits the Commission's role to certifying that the CCA has established its own EM&V protocols, which it has.

6. *Includes performance metrics regarding the CCA's achievement of the objectives listed in paragraphs (1) to (5), inclusive, and in any previous plan."*

MEA's plan identifies the following items as performance metrics:

- (1) Consistency with statutory goals
 - Tracking hard to reach customers
 - Progress towards zero net energy in multifamily
 - Program energy performance reporting
- (2) Cost-effectiveness calculations including Total Resource Costs (TRC) and Program Administrator Costs (PAC)
- (3) Tracking of customers participating in both PG&E MFEER and MEA MFEEP programs
- (4) MFEEP percentage of non-lighting measure savings as compared to total EE measures adopted in the MFEEP
- (5) Evaluation, measurement, and verification process and tracking

MEA's list suggests it has at least one metric for each of the five objectives listed in paragraphs (1) to (5) of Section 381.1(f). However, some of the metrics are vague, as currently worded, and could be improved by identifying the unit of measurement that will be used to determine them. For example, "Tracking of customers participating in both PG&E MFEER and MEA MFEEP" could be reworded to say "Number of customers participating in both PG&E MFEER and MEA MFEEP."

While these subtle changes do not lead us to deny MEA's request for certification of its plan, we recognize that improvements could be made.

MEA's 2012 Plan is Certified as Specified Herein

According to the foregoing analysis and discussion, the Commission finds that MEA's 2012 plan satisfactorily meets the required criteria under Section 381.1(f)(1)-(6), and we hereby certify the plan.

PG&E shall make remittances to MEA as follows:

February - July 2012: By no later than August 31, 2012, PG&E is directed to make a lump-sum payment to MEA, based on actual collections (not forecast sales) received from MEA customers during the February 2012 to July 2012 timeframe.

August, September, October, November, and December 2012: PG&E is directed to make remittances to MEA based on actual collections from MEA customers during these months, by the end of the following month. The remittance schedule will, therefore, occur as follows:

- For August EE collections: September 30, 2012
- For September EE collections: October 31, 2012
- For October EE collections: November 30, 2012
- For November EE collections: December 31, 2012
- For December EE collections: January 31, 2013

Comments

Public Utilities Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g)(2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was served on MEA, PG&E, and the R.09-11-014 service list and issued for public review and comment no later than 30 days prior to a vote of the Commission.

PG&E, Southern California Edison Company (SCE), and SDG&E submitted comments on the MEA plan on July 23, 2012; MEA submitted reply comments on July 27, 2012. Some comments have been addressed above, and we address additional comments below.

Due Process

PG&E and SCE raise due process claims without making a specific allegation. (PG&E Comments, p. 2; SCE Comments p. 5.) PG&E and SCE argue that the Commission should not certify MEA's plan and should instead consider MEA's request after it establishes the process being considered in R.09-11-014 (ALJ's Ruling on REN and CCA Administration of EE). However, the ALJ's Ruling on REN and CCA Administration of EE addresses EE plans for the program years 2013-2014 and 2015 and beyond; it does not consider CCA elections to administer EE funds for 2012. PG&E and SCE ask that we delay certifying MEA's plan under the election option to make the *process* for the application option perfect, thus allowing PG&E to retain funds that MEA has a right to administer under the election option. At no time did PG&E or SCE state that they had an inadequate opportunity to review and comment on the *substance* of MEA's plan.

The apparent purpose of the SB 790's additions to Section 381.1 is to give CCAs – and *only* CCAs – a simpler route to become the administrator of energy efficiency and conservation program funds collected by the electric utilities through nonbypassable charges. SB 790's addition of the “election” option under subdivisions (e) – (g) to Section 381.1 thus stands in marked contrast with the preexisting, more discretionary opportunity for “any party” to “apply” to be an EE program administrator under subdivision (a).

As PG&E and SCE have noted, MEA served a copy of its June 22, 2012 plan on the IOUs and all parties in R.09-11-014; and the IOUs and all parties in R.09-11-014 had an opportunity to review MEA's plan and submit comments and reply comments on both the plan and the draft resolution (mailed July 3, 2012). In point of fact, PG&E, SCE, and SDG&E did comment on specific elements of MEA's plan in their written comments.

Section 381.1's directive for an impartial process requires that the Commission develop process for approving applications or certifying plans. SB 790 added Section 381.1(d), which by its own terms requires an impartial process established by the Commission to review applications and prohibits the Commission from delegating the authority to do so to electrical corporations.

(See also SB 790 Assembly Appropriations Committee Report (August 17, 2011 hearing).)

The Legislature's goal of establishing the election option is to simplify the means by which CCAs can administer the EE funds of their customers. The election option is one that the CCAs have as a matter of right, and the Commission has no discretion to deny a CCA request for certification of their plan if such plan satisfies the requirements of Section 381.1(f).

Expiration of the Public Goods Charge Funding

PG&E comments that the public goods charge (PGC) has expired and so no 2012 energy efficiency funds are available to MEA to administer its own energy efficiency program. PG&E's statement that "the statutory authorization of funds subject to 'election' by CCAs under Public Utilities Code Section 381.1(f) has expired" is misleading because it assumes incorrectly the election option depends on the availability of PGC funds. The election option under subdivision (f), does not contain a reference to Section 381 and its funding source, but rather refers to a CCA's administration of "funds collected from the aggregator's electric service customers and collected through a nonbypassable charge authorized by the commission." For the year 2012, PG&E collects EE funds from its and MEA's customers through a nonbypassable charge authorized by the Commission. Certification of MEA's plan for 2012 EE funds therefore satisfies the requirements of Section 381.1(f). (Compare Section 381.1(a) (the application option makes explicit reference to energy efficiency and conservation "programs established pursuant to Section 381."))

Section 327

PG&E and SCE assert that Section 327 prohibits third-parties from administering low-income EE programs. (PG&E Comments, pp. 1-2; SEC Comments pp. 4-5.) PG&E and SCE misread Section 327. Section 327 requires that IOUs that participate in the CARE program must also administer EE programs to low-income customers and administer low-income EE programs in a certain manner. (AB 1393 (Stats. 1999, ch. 700 (Wright)).) However, nothing in Section 327 restricts administration of low-income EE programs solely to the IOUs, and Section 381.1 was codified subsequent to the codification of Section 327. While SB 790 excludes "funds collected for broader statewide and regional programs authorized by the commission" (Section 381.1(e)), SB 790 does not exclude low-income EE program funds in the same manner. Therefore, nothing in Sections

327 or 381.1 can be read to prohibit CCA administration of low-income EE programs.

CCA Independent Administration of EE Programs

SCE alleges that the resolution errs in proposing MEA's independent administration of ratepayer EE funds by the CCA. (SCE Comments, p. 2.) SCE argues that the Commission's prior interpretation of an EE program administrator – that of an implementer – must stand and that non-IOWs cannot be allowed to administer EE programs. (Id., p. 4.) SCE's argument contradicts the very language of Section 381.1. Section 381.1(e) (added by SB 790) states that the Commission "shall allow a registered community choice aggregator to elect to become the administrator of funds collected from the aggregator's electric service customers..." SB 790 does not permit the Commission to prohibit MEA from independently administering the EE funds of its customers if its plan meets the requirements of Section 381.1(f). The Legislature had fully intended that "[t]his bill [SB 790] would allow a CCA [to] administer its own energy efficiency program." (SB 790 Assembly Utilities and Commerce Committee Report (July 5, 2011 hearing).) Operation of SB 790 and its express directives cannot be prevented by statutory provisions or Commission decisions that predate SB 790's changes to the Public Utilities Code.

CCA Participation in On-Bill Repayment (OBR) Development

SDG&E submitted additional comments recommending that this Resolution require MEA to participate in the stakeholder process for development of an OBR effort to avoid inconsistencies or duplicative local efforts with the broader statewide financing effort. In its reply comments MEA states that such participation should be voluntary and should not restrict or delay MEA's own plans for developing OBR for its own customers. The Commission agrees with the importance of coordinating energy efficiency financing efforts throughout the state. Accordingly, MEA is encouraged to participate in the statewide financing stakeholder process to develop a multi-family OBR product. (See, e.g., Section 399.4(c). See also SB 790 Assembly Utilities and Commerce Committee Report (June 27, 2011 hearing) ("CCAs should participate in the PUC proceedings so that the priorities of the CCA can be considered along with statewide priorities."))

Findings and Conclusions:

1. Public Utilities Code Section 381.1(e) requires the Commission to establish an impartial process to allow a Community Choice Aggregator (CCA) to elect to become administrator of funds collected from the CCA's electric service customers through a nonbypassable charge authorized by the Commission for cost-effective energy efficiency and conservation programs except those funds collected for broader statewide and regional programs authorized by the Commission.
2. Public Utilities Code Sections 381.1(e) and (f) require that the Commission certify a CCA's energy efficiency plan, approved by the CCA's governing board, if it contains funding requirements, a program description, a cost-effectiveness analysis, and the duration of the program, and if it: (1) is consistent with the goals of programs established pursuant to Public Utilities Code Sections 381.1 and 399.4; (2) advances the public interest in maximizing cost-effective electricity savings and related benefits; (3) accommodates the need for broader statewide or regional programs; (4) includes audit and reporting requirements consistent with those established by the Commission pursuant to Public Utilities Code Section 381.1; (5) includes evaluation, measurement, and verification protocols established by the CCA; and (6) includes performance metrics regarding the CCA's achievement of the objectives listed in paragraphs (1) through (5) of Public Utilities Code Section 381.1(f) and in any previous plan. Public Utilities Code Sections 381.1(e) and (f) do not: prescribe the method of calculating the funding levels; prescribe the method of determining cost-effectiveness; define "cost-effective energy efficiency electricity savings and related benefits"; define "regional programs; prescribe requirements for the auditing and reporting requirements, for evaluation, measurement, and verification protocols, or for performance metrics. "
3. The apparent purpose of the 2011 Senate Bill 790's addition of subdivisions (e) - (g) to Section 381.1 is to give CCAs - and *only* CCAs - a simpler route to become the administrator of energy efficiency and conservation program funds collected by the electric utilities through nonbypassable charges. Senate Bill 790's addition of the "election" option under subdivisions (e) - (g) to Section 381.1 thus stands in marked contrast with the preexisting, more discretionary opportunity for "any party" to "apply" to be an energy efficiency program administrator under subdivision (a).

4. The June 20, 2012 Administrative Law Judge's ruling in R.09-11-014 proposed a methodology and definition of terms to determine the maximum amount of eligible funding Community Choice Aggregators may elect to administer.
5. Until the Commission adopts permanent procedures for all CCAs to elect to become energy efficiency program administrators pursuant to Public Utilities Code Section 381.1(e) - (g), it is reasonable, on an interim basis, to consider and certify a CCA's election to administer energy efficiency program administration plans by the Commission's resolution process.
6. Marin Energy Authority exercised its election right under Public Utilities Code Section 381.1(e) - (f) by submitting its 2012 energy efficiency program plan to the Commission's Energy Division Director and serving it on all parties in R.09-11-014 on June 22, 2012.
7. Marin Energy Authority's 2012 energy efficiency plan was approved by its governing board and contains the plan's funding requirements, a program description, a cost-effectiveness analysis, and the duration of the program.
8. In its 2012 energy efficiency program plan, Marin Energy Authority seeks to administer \$428,270 in funds collected by Pacific Gas & Electric Company (PG&E) from Marin Energy Authority customers from February 3, 2012 through December 31, 2012 through nonbypassable charges (specifically, the Procurement Energy Efficiency Revenue Adjustment Mechanism and the Public Purpose Program Revenue Adjustment Mechanism).
9. It is reasonable to calculate the maximum amount of 2012 funds Marin Energy Authority would be eligible to collect and administer pursuant to Public Utilities Code Section 381.1(e), according to the method specified herein and further elaborated in Appendices A, B, and C of this resolution.
10. A reasonable forecast of the maximum amount of funds Marin Energy Authority would be eligible to collect for administration of 2012 energy efficiency programs is \$379,249.
11. Marin Energy Authority's requested funding amount falls within the range of likely collections Pacific Gas & Electric will make from Marin Energy Authority customers in 2012.
12. Pacific Gas & Electric is projected to have sufficient unspent 2010-2012 funds, including but not limited to, \$457,284 in the "government

programs” category, which could be transferred to Marin Energy Authority.

13. Marin Energy Authority’s 2012 energy efficiency program administration plan promotes the administration of cost-effective energy efficiency and conservations programs by CCAs and ensures that local interests are reflected in the energy efficiency programs in California. Marin Energy Authority’s 2012 energy efficiency program administration plan is consistent with the goals of the programs established pursuant to Public Utilities Code Sections 381.1 and 399.4 and therefore meets the Public Utilities Code Section 381.1(f)(1) criteria.
14. It is reasonable and appropriate to make a determination under Public Utilities Code Section 381.1(f)(2) as to whether a plan advances the public interest in maximizing cost-effective electricity savings and related benefits by referring to current Commission rules and policies governing energy efficiency cost-effectiveness.
15. Marin Energy Authority’s 2012 energy efficiency program administration plan produced a Total Resource Cost test result of 0.82 and a Program Administrator Cost test result of 1.73.
16. Public Utilities Code Section 381.1(f)(2) requires that Marin Energy Authority’s 2012 energy efficiency program administration plan must maximize both the public interest in maximizing cost-effective electricity savings and related benefits. We do not certify Marin Energy Authority’s 2012 energy efficiency program administration plan based on its Program Administrator Cost test result of 1.73 alone. Marin Energy Authority’s 2012 energy efficiency program administration plan not only scores comparably with the corresponding parts of PG&E’s energy efficiency program, but also produces related benefits in the form of targeted local program recruitment and outreach and workforce development and job creation. Marin Energy Authority’s 2012 energy efficiency program administration plan therefore meets the Public Utilities Code Section 381.1(f)(2) criteria.
17. Marin Energy Authority’s 2012 energy efficiency program administration plan will not interfere with PG&E’s administration of its MFEER and thus accommodates the need for statewide and regional programs. Marin Energy Authority’s 2012 energy efficiency program administration plan therefore meets the Public Utilities Code Section 381.1(f)(3) criteria.

18. Reporting requirements included in Marin Energy Authority's 2012 energy efficiency program administration plan are consistent with the reporting requirements for the electrical corporations and sufficient for the funding we authorize in this resolution. Based on the Commission's determination in R.09-11-014, MEA may be subject to different audit and reporting requirements for next funding cycles. Marin Energy Authority's 2012 energy efficiency program administration plan therefore meets the Public Utilities Code Section 381.1(f)(4) criteria.
19. Marin Energy Authority's 2012 energy efficiency program administration plan includes evaluation, measurement, and verification protocols established by the CCA. Marin Energy Authority's 2012 energy efficiency program administration plan therefore meets the Public Utilities Code Section 381.1(f)(5) criteria.
20. Nothing in this resolution is intended to establish a precedent for how any other requests to administer energy efficiency funds should be reviewed. The rules that apply to community choice aggregators are contained in Public Utilities Code Section 381.1(e) and (f), and are different than rules that might otherwise apply to other kinds of entities, such as electrical corporations. Furthermore, the Commission is considering in R.09-11-014 how requests from community choice aggregators under 381.1(e) and (f) should be reviewed on a permanent basis. Because of the need to process MEA's request before those procedures have been established, the review process here is necessarily an interim one.

ORDERING PARAGRAPHS:

1. Marin Energy Authority's 2012 energy efficiency program administration plan, as submitted on June 22, 2012, is certified pursuant to Public Utilities Code Section 381.1(f).
2. By August 31, 2012, Pacific Gas & Electric Company (PG&E) shall transfer to the Marin Energy Authority (MEA) fourteen percent of all monies collected through nonbypassable charges (specifically, the Procurement Energy Efficiency Revenue Adjustment Mechanism and the Public Purpose Program Revenue Adjustment Mechanism) from MEA retail electricity customers during February 3, 2012 to July 31, 2012 timeframe.

By the end of every month thereafter, PG&E shall transfer to MEA fourteen percent of all monies collected through nonbypassable charges (the Procurement Energy Efficiency Revenue Adjustment Mechanism and the Public Purpose Program Revenue Adjustment Mechanism) from MEA retail electricity customers during the prior calendar month. The total amount transferred from PG&E to MEA shall not to exceed \$428,270, which represents the amount requested by MEA via its 2012 Energy Efficiency plan.

3. PG&E is authorized to and shall transfer the funds identified in Ordering Paragraph 2 from the "governmental programs" category of its 2010-2012 program funding, pursuant to D.09-09-047 and fund-shifting rules clarified in the December 22, 2011 Assigned Commissioner's Ruling in Rulemaking 09-11-014. If the "governmental programs" category of its 2010-2012 program funding is insufficient to comply with Ordering Paragraph 2, PG&E shall transfer the balance from the on-bill financing program in the "other programs" fund-shifting category.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on August 2, 2012, the following Commissioners voting favorably thereon:

PAUL CLANON
Executive Director

Appendix A
Forecasted Total Energy Efficiency
Collections from MEA Customers

Monthly dollar figures broken out by customer class (February - December 2012)*

Table 1a		Usage x Rates = amounts collected by customer class (feb - dec: 2012)												Totals
Class/Schedule	january	february	march	april	may	june	july	august	september	october	november	december	Totals	
E-1	\$ 53,390.92	\$ 51,149.77	\$ 47,341.63	\$ 42,648.05	\$ 47,399.28	\$ 140,197.65	\$ 142,989.77	\$ 145,051.64	\$ 144,032.28	\$ 168,020.49	\$ 188,593.27	\$	1,170,814.74	
EL-1	\$ 1,989.96	\$ 1,967.01	\$ 1,849.72	\$ 1,558.49	\$ 1,732.12	\$ 18,645.28	\$ 19,027.83	\$ 19,405.68	\$ 19,334.86	\$ 24,078.43	\$ 26,939.35	\$	136,528.74	
E-7	\$ 3,700.29	\$ 3,723.24	\$ 3,178.61	\$ 2,518.69	\$ 2,799.28	\$ 7,625.04	\$ 8,014.20	\$ 8,442.43	\$ 9,289.30	\$ 11,580.35	\$ 14,000.93	\$	74,872.35	
E-8	\$ 3,028.11	\$ 2,929.28	\$ 2,653.06	\$ 2,441.17	\$ 2,713.13	\$ 5,951.50	\$ 6,080.54	\$ 6,066.61	\$ 6,041.38	\$ 6,803.58	\$ 7,634.50	\$	52,342.85	
EL-8	\$ 298.15	\$ 304.19	\$ 262.92	\$ 237.55	\$ 264.02	\$ 549.46	\$ 525.83	\$ 538.14	\$ 523.50	\$ 682.08	\$ 826.11	\$	5,011.96	
A-1	\$ 2,863.71	\$ 3,139.25	\$ 3,690.94	\$ 2,783.45	\$ 3,093.54	\$ 48,752.30	\$ 49,473.70	\$ 50,369.42	\$ 47,692.06	\$ 49,478.03	\$ 49,964.81	\$	311,301.21	
A-6	\$ 2,984.28	\$ 2,884.59	\$ 2,854.44	\$ 2,331.94	\$ 2,591.74	\$ 11,626.89	\$ 11,593.94	\$ 12,209.87	\$ 11,705.31	\$ 11,544.58	\$ 11,972.18	\$	84,299.76	
A-15	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
TC-1	\$ 142.78	\$ 142.62	\$ 140.44	\$ 137.97	\$ 153.34	\$ 219.99	\$ 230.65	\$ 227.93	\$ 222.36	\$ 237.79	\$ 235.51	\$	2,091.37	
A-10T	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
A-10P	\$ 135.85	\$ 89.12	\$ 66.69	\$ 42.39	\$ 47.12	\$ 247.47	\$ 275.62	\$ 298.87	\$ 293.77	\$ 301.95	\$ 190.32	\$	1,989.18	
A-10S	\$ 28,527.15	\$ 27,915.74	\$ 26,357.65	\$ 26,205.98	\$ 29,125.47	\$ 48,146.32	\$ 49,147.37	\$ 51,156.91	\$ 48,133.52	\$ 47,635.92	\$ 46,197.76	\$	428,549.79	
E-19T	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
E-19P	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,849.86	\$ 2,784.71	\$ 3,141.07	\$ 3,095.85	\$ 3,987.68	\$ 4,200.29	\$	20,059.46	
E-19S	\$ 2,232.41	\$ 2,380.47	\$ 2,322.03	\$ 2,486.83	\$ 2,763.88	\$ 37,831.63	\$ 37,687.33	\$ 38,211.07	\$ 35,799.84	\$ 36,482.30	\$ 35,193.72	\$	233,391.50	
LS-1, LS-2, LS-3	\$ 1,582.59	\$ 1,638.06	\$ 1,676.37	\$ 1,634.90	\$ 1,817.04	\$ 2,368.02	\$ 2,241.77	\$ 2,274.20	\$ 2,270.57	\$ 2,243.41	\$ 2,255.56	\$	22,002.49	
OL-1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 35.12	\$ 34.39	\$ 34.38	\$ 33.69	\$ 35.71	\$ 34.87	\$	208.15	
Standby T	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Standby P	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Standby S	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
AG-1A	\$ 9.51	\$ 8.39	\$ 6.75	\$ 6.72	\$ 7.47	\$ 290.75	\$ 257.96	\$ 243.07	\$ 242.98	\$ 276.82	\$ 299.41	\$	1,649.83	
AG-RA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
AG-VA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
AG-4A	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 151.84	\$ 112.55	\$ 128.06	\$ 133.67	\$ 132.86	\$ 121.53	\$	780.51	
AG-5A	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 562.70	\$ 498.25	\$ 560.37	\$ 478.90	\$ 479.59	\$ 502.03	\$	3,081.84	
AG-1B	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 272.61	\$ 492.05	\$ 182.91	\$ 256.12	\$ 161.36	\$ 195.47	\$	1,560.52	
AG-RB	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
AG-VB	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
AG-4B	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 18.30	\$ 0.75	\$ 1.56	\$ 0.87	\$ 0.64	\$ 0.67	\$	22.78	
AG-4C	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
AG-5B	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 512.75	\$ 483.13	\$ 615.04	\$ 526.34	\$ 598.02	\$ 562.19	\$	3,297.46	
AG-5C	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 261.29	\$ 357.90	\$ 324.07	\$ 179.77	\$ 31.39	\$ 12.23	\$	1,166.64	
E-20T	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
E-20P	\$ 1,953.13	\$ 2,075.79	\$ 1,913.97	\$ 2,193.13	\$ 2,437.46	\$ 14,160.53	\$ 14,180.52	\$ 14,194.01	\$ 14,037.06	\$ 12,686.65	\$ 11,933.97	\$	91,766.22	
E-20S	\$ 1,424.44	\$ 1,279.13	\$ 1,142.59	\$ 2,072.52	\$ 2,303.41	\$ 9,543.07	\$ 9,885.35	\$ 8,897.69	\$ 6,968.83	\$ 6,729.09	\$ 5,485.03	\$	55,731.16	
													\$ 2,702,520.52	

*The monthly dollar figures in Table 1a were obtained by multiplying the associated usage (KWh) totals in Table 1b by the \$/KWh totals in Table 1c; these tables are included in the following two pages.

Table 1b		Usage (KWh)											
Class/Schedule	january	february	march	april	may	june	july	august	september	october	november	december	
E-1		11,432,744	10,952,841	10,137,394	9,132,344	10,149,739	30,020,910	30,618,794	31,060,309	30,842,029	35,978,692	40,383,998	
EL-1		426,115	421,202	396,086	333,724	370,903	3,992,565	4,074,482	4,155,393	4,140,228	5,155,981	5,768,597	
E-7		787,295	792,179	676,299	535,891	595,592	1,622,348	1,705,149	1,796,261	1,976,447	2,463,904	2,978,922	
E-8		576,783	557,958	505,345	464,985	516,787	1,133,618	1,158,198	1,155,545	1,150,738	1,295,920	1,454,190	
EL-8		56,791	57,940	50,080	45,248	50,289	104,659	100,159	102,503	99,715	129,920	157,355	
A-1		560,414	614,335	722,296	544,706	605,389	9,540,568	9,681,743	9,857,030	9,333,084	9,682,589	9,777,848	
A-6		682,901	660,089	653,191	533,626	593,075	2,660,615	2,653,076	2,794,022	2,678,561	2,641,780	2,739,629	
A-15		-	-	-	-	-	-	-	-	-	-	-	
TC-1		28,670	28,638	28,200	27,705	30,791	44,174	46,316	45,769	44,650	47,749	47,292	
A-10T		-	-	-	-	-	-	-	-	-	-	-	
A-10P		31,890	20,921	15,656	9,952	11,060	58,092	64,700	70,158	68,959	70,881	44,676	
A-10S		6,498,212	6,358,937	6,004,020	5,969,471	6,634,504	10,967,271	11,195,300	11,653,056	10,964,355	10,851,006	10,523,408	
E-19T		-	-	-	-	-	-	-	-	-	-	-	
E-19P		-	-	-	-	-	768,156	750,595	846,650	834,462	1,074,845	1,132,154	
E-19S		545,821	582,023	567,733	608,028	675,766	9,249,787	9,214,505	9,342,559	8,753,017	8,919,877	8,604,822	
LS-1, LS-2, LS-3		314,631	325,659	333,275	325,030	361,240	470,778	445,680	452,128	451,405	446,005	448,421	
OL-1		-	-	-	-	-	7,123	6,976	6,973	6,834	7,243	7,073	
Standby T		-	-	-	-	-	-	-	-	-	-	-	
Standby P		-	-	-	-	-	-	-	-	-	-	-	
Standby S		-	-	-	-	-	-	-	-	-	-	-	
AG-1A		1,243	1,097	882	879	977	38,006	33,720	31,774	31,762	36,186	39,139	
AG-RA		-	-	-	-	-	-	-	-	-	-	-	
AG-VA		-	-	-	-	-	-	-	-	-	-	-	
AG-4A		-	-	-	-	-	26,827	19,885	22,626	23,617	23,473	21,471	
AG-5A		-	-	-	-	-	117,967	104,454	117,479	100,398	100,542	105,248	
AG-1B		-	-	-	-	-	47,002	84,835	31,536	44,159	27,821	33,702	
AG-RB		-	-	-	-	-	-	-	-	-	-	-	
AG-VB		-	-	-	-	-	-	-	-	-	-	-	
AG-4B		-	-	-	-	-	3,719	152	316	177	131	136	
AG-4C		-	-	-	-	-	-	-	-	-	-	-	
AG-5B		-	-	-	-	-	142,430	134,202	170,843	146,205	166,116	156,165	
AG-5C		-	-	-	-	-	74,869	102,550	92,856	51,509	8,994	3,504	
E-20T		-	-	-	-	-	-	-	-	-	-	-	
E-20P		548,632	583,087	537,633	616,047	684,679	3,977,678	3,983,292	3,987,081	3,942,996	3,563,666	3,352,237	
E-20S		358,800	322,199	287,806	522,046	580,205	2,403,797	2,490,012	2,241,233	1,755,373	1,694,984	1,381,621	

Table 1c		\$/KWh Rates = Proc EE + PPRAM EE										
Class/Schedule	january	february	march	april	may	june	july	august	september	october	november	december
E-1		\$0.004670	\$0.004670	\$0.004670	\$0.004670	\$0.004670	\$0.004670	\$0.004670	\$0.004670	\$0.004670	\$0.004670	\$0.004670
EL-1		\$0.004670	\$0.004670	\$0.004670	\$0.004670	\$0.004670	\$0.004670	\$0.004670	\$0.004670	\$0.004670	\$0.004670	\$0.004670
E-7		\$0.004700	\$0.004700	\$0.004700	\$0.004700	\$0.004700	\$0.004700	\$0.004700	\$0.004700	\$0.004700	\$0.004700	\$0.004700
E-8		\$0.005250	\$0.005250	\$0.005250	\$0.005250	\$0.005250	\$0.005250	\$0.005250	\$0.005250	\$0.005250	\$0.005250	\$0.005250
EL-8		\$0.005250	\$0.005250	\$0.005250	\$0.005250	\$0.005250	\$0.005250	\$0.005250	\$0.005250	\$0.005250	\$0.005250	\$0.005250
A-1		\$0.005110	\$0.005110	\$0.005110	\$0.005110	\$0.005110	\$0.005110	\$0.005110	\$0.005110	\$0.005110	\$0.005110	\$0.005110
A-6		\$0.004370	\$0.004370	\$0.004370	\$0.004370	\$0.004370	\$0.004370	\$0.004370	\$0.004370	\$0.004370	\$0.004370	\$0.004370
A-15		\$0.005110	\$0.005110	\$0.005110	\$0.005110	\$0.005110	\$0.005110	\$0.005110	\$0.005110	\$0.005110	\$0.005110	\$0.005110
TC-1		\$0.004980	\$0.004980	\$0.004980	\$0.004980	\$0.004980	\$0.004980	\$0.004980	\$0.004980	\$0.004980	\$0.004980	\$0.004980
A-10T		\$0.004050	\$0.004050	\$0.004050	\$0.004050	\$0.004050	\$0.004050	\$0.004050	\$0.004050	\$0.004050	\$0.004050	\$0.004050
A-10P		\$0.004260	\$0.004260	\$0.004260	\$0.004260	\$0.004260	\$0.004260	\$0.004260	\$0.004260	\$0.004260	\$0.004260	\$0.004260
A-10S		\$0.004390	\$0.004390	\$0.004390	\$0.004390	\$0.004390	\$0.004390	\$0.004390	\$0.004390	\$0.004390	\$0.004390	\$0.004390
E-19T		\$0.003690	\$0.003690	\$0.003690	\$0.003690	\$0.003690	\$0.003690	\$0.003690	\$0.003690	\$0.003690	\$0.003690	\$0.003690
E-19P		\$0.003710	\$0.003710	\$0.003710	\$0.003710	\$0.003710	\$0.003710	\$0.003710	\$0.003710	\$0.003710	\$0.003710	\$0.003710
E-19S		\$0.004090	\$0.004090	\$0.004090	\$0.004090	\$0.004090	\$0.004090	\$0.004090	\$0.004090	\$0.004090	\$0.004090	\$0.004090
LS-1, LS-2, LS-3		\$0.005030	\$0.005030	\$0.005030	\$0.005030	\$0.005030	\$0.005030	\$0.005030	\$0.005030	\$0.005030	\$0.005030	\$0.005030
OL-1		\$0.004930	\$0.004930	\$0.004930	\$0.004930	\$0.004930	\$0.004930	\$0.004930	\$0.004930	\$0.004930	\$0.004930	\$0.004930
Standby T		\$0.003710	\$0.003710	\$0.003710	\$0.003710	\$0.003710	\$0.003710	\$0.003710	\$0.003710	\$0.003710	\$0.003710	\$0.003710
Standby P		\$0.005990	\$0.005990	\$0.005990	\$0.005990	\$0.005990	\$0.005990	\$0.005990	\$0.005990	\$0.005990	\$0.005990	\$0.005990
Standby S		\$0.005580	\$0.005580	\$0.005580	\$0.005580	\$0.005580	\$0.005580	\$0.005580	\$0.005580	\$0.005580	\$0.005580	\$0.005580
AG-1A		\$0.007650	\$0.007650	\$0.007650	\$0.007650	\$0.007650	\$0.007650	\$0.007650	\$0.007650	\$0.007650	\$0.007650	\$0.007650
AG-RA		\$0.005680	\$0.005680	\$0.005680	\$0.005680	\$0.005680	\$0.005680	\$0.005680	\$0.005680	\$0.005680	\$0.005680	\$0.005680
AG-VA		\$0.005690	\$0.005690	\$0.005690	\$0.005690	\$0.005690	\$0.005690	\$0.005690	\$0.005690	\$0.005690	\$0.005690	\$0.005690
AG-4A		\$0.005660	\$0.005660	\$0.005660	\$0.005660	\$0.005660	\$0.005660	\$0.005660	\$0.005660	\$0.005660	\$0.005660	\$0.005660
AG-5A		\$0.004770	\$0.004770	\$0.004770	\$0.004770	\$0.004770	\$0.004770	\$0.004770	\$0.004770	\$0.004770	\$0.004770	\$0.004770
AG-1B		\$0.005800	\$0.005800	\$0.005800	\$0.005800	\$0.005800	\$0.005800	\$0.005800	\$0.005800	\$0.005800	\$0.005800	\$0.005800
AG-RB		\$0.005190	\$0.005190	\$0.005190	\$0.005190	\$0.005190	\$0.005190	\$0.005190	\$0.005190	\$0.005190	\$0.005190	\$0.005190
AG-VB		\$0.005130	\$0.005130	\$0.005130	\$0.005130	\$0.005130	\$0.005130	\$0.005130	\$0.005130	\$0.005130	\$0.005130	\$0.005130
AG-4B		\$0.004920	\$0.004920	\$0.004920	\$0.004920	\$0.004920	\$0.004920	\$0.004920	\$0.004920	\$0.004920	\$0.004920	\$0.004920
AG-4C		\$0.004960	\$0.004960	\$0.004960	\$0.004960	\$0.004960	\$0.004960	\$0.004960	\$0.004960	\$0.004960	\$0.004960	\$0.004960
AG-5B		\$0.003600	\$0.003600	\$0.003600	\$0.003600	\$0.003600	\$0.003600	\$0.003600	\$0.003600	\$0.003600	\$0.003600	\$0.003600
AG-5C		\$0.003490	\$0.003490	\$0.003490	\$0.003490	\$0.003490	\$0.003490	\$0.003490	\$0.003490	\$0.003490	\$0.003490	\$0.003490
E-20T		\$0.002870	\$0.002870	\$0.002870	\$0.002870	\$0.002870	\$0.002870	\$0.002870	\$0.002870	\$0.002870	\$0.002870	\$0.002870
E-20P		\$0.003560	\$0.003560	\$0.003560	\$0.003560	\$0.003560	\$0.003560	\$0.003560	\$0.003560	\$0.003560	\$0.003560	\$0.003560
E-20S		\$0.003970	\$0.003970	\$0.003970	\$0.003970	\$0.003970	\$0.003970	\$0.003970	\$0.003970	\$0.003970	\$0.003970	\$0.003970

[End Appendix A]

Appendix B
PG&E Total Portfolio Breakdown by
Funding Category

Table 2. PG&E Total Portfolio Budget Breakdown by Funding Category

*Most recently authorized budgets per D.09-09-047, as modified by PG&E AL 3235-G-A/3901-E-A, effective February 10, 2012.

Program Category	Budget Excluded*	Budget Included*
Statewide (a)	\$733,733,309	\$0
ZNE	\$5,698,239	\$0
Integrated Demand Side Management	\$6,429,186	\$0
EM&V	\$53,520,000	\$0
3P - No Geographic restrictions (b)	\$265,344,556	\$0
3P – Geographic restrictions (c)	\$0	\$55,440,887
LGP (d)	\$0	\$110,530,649
LG Institutional (e)	\$57,666,146	\$0
Local programs (except OBF) (f)	\$0	\$35,239,355
OBF (g)	\$27,844,983	\$0
Total by Category (h)	\$1,150,236,419	\$189,083,466
Total Portfolio		\$1,338,000,000
% Included		14%
% Excluded		86%

(a) - Programs approved by the Commission as "statewide" among all the IOUs.

(b) - Third-party programs offered with no geographical restrictions throughout PG&E's service territory.

(c) - Third party programs that are geographically limited (per program rules) within PG&E's service territory.

(d) - Local Government Partnerships. These are restricted to local areas.

(e) - Government partnerships available throughout PG&E's service territory.

(f) - All programs proposed as "local" programs by PG&E in A.08-07-031, and approved in D.09-09-047, except on-bill financing.

(g) - On-bill financing, a program which is offered to qualifying non-residential customers throughout PG&E's service territory

(h) - The numbers on this line do not add up to PG&E's total approved portfolio budget of \$1,338,000,000. This error represents less than 1% (0.10%) and has negligible impact on the percentage figure used to calculate MEA's eligible 2012 funding amount.

MEA Collection Period	MEA Customer Collections (\$)	\$ of Portfolio Available for MEA Funding	\$ of Portfolio Excluded From Funding Availability	% of Portfolio Available for Funding	\$ Available Based on MEA Collections
Feb - Dec	\$2,702,521	\$189,083,466	\$1,150,236,419	14.13%	\$379,249

Appendix C
PG&E Third-Party Program Budget
Breakdown for “Regional” Programs

Table 3a. PG&E Third-Party Program Budgets Categorized as "Regional" Programs (Excluded from MEA Funding Calculation)		
*Most recently authorized budgets per D.09-009-047, as modified by PG&E AL 3235-G-A/3901-E-A, effective February 10, 2012		
Program ID#	Program Name	Budget*
PGE2176	California Multifamily New Homes Program	\$8,386,261
PGE2234	Comprehensive Food Processing Audit & Resource Efficiency	6,157,516
PGE2235	Dairy Industry Resource Advantage	\$1,789,381
PGE2178	Energy Star Manufactured Homes	\$1,175,638
PGE2236	Process Wastewater Treatment and Energy Management for Ag & Food Processing	\$2,251,070
PGE2189	Cool Control Plus	\$6,259,382
PGE2210	Cool Schools	\$1,045,829
PGE2222	EE Services for Oil Production	\$20,440,750
PGE2223	Heavy Industry EE Program	36,873,179
PGE2225	Refinery EE Program	\$19,079,203
PGE2227	Cement Production and Distribution EE	\$1,660,134
PGE2233	Wine Industry Efficiency Solutions	\$8,550,811
PGE2181	AirCarePlus	\$20,593,564
PGE2182	Commercial / Industrial Boilers EE	\$8,150,527
PGE2185	Energy Smart Grocer	\$17,686,937
PGE2186	Enhanced Automation Initiative	\$1,864,992
PGE2187	Monitoring-Based Persistence Commissioning	\$3,795,579
PGE2190	Lodging Savers	\$11,250,838
PGE2191	Medical Bldg Tune-Up	\$2,201,773
PGE2193	School EE Program	\$9,401,258
PGE2198	Data Center Cooling Controls Prog	\$1,804,422
PGE2199	EE Parking Garage	\$2,190,696
PGE2200	Furniture Store EE	\$3,492,764
PGE2201	High Performance Office Lighting	\$6,024,668
PGE2202	LED Accelerator	\$3,827,740
PGE2203	Monitoring-Based Commissioning	\$1,827,769
PGE2204	GreenVent for EE Kitchens	\$5,109,511
PGE2206	Healthcare EE Program	\$6,719,136
PGE2209	Ozone Laundry EE	\$1,894,224
PGE2212	California Preschool EE Program	\$2,428,790
PGE2213	K-12 Private Schools and Colleges Audit Retro	\$2,725,590
PGE2214	Matrix Energy Services	\$2,101,984
PGE2220	Assessment, Implementation, and Monitoring of compressed aire systems	\$4,346,993
PGE2221	CA Wastewater Process Optimization Program	\$3,918,513
PGE2183	Comprehensive Retail Energy Mngmt	\$1,931,159
PGE2224	Ecos Air Industrial Compressed Air	\$6,828,262
PGE2228	Industrial Retrocommission	\$5,373,211
PGE2230	Dairy EE Program	\$1,459,273
PGE2231	Industrial Refridgeration Perf Plus	\$4,562,387
PGE2240	Builder Energy Code Training	\$1,671,925
PGE2241	Green Building Technical Support Service	\$1,991,104
PGE2205	Casino Green / Tribal Properties	\$4,499,813
Total		\$265,344,556

Table 3b. PG&E Third-Party Program Budgets <u>not</u> Categorized as "Regional" Programs (Included in MEA Funding Calculation)		
Program ID#	Program Name	Budget*
PGE2179	Direct Install for Manufactured and Mobile	\$4,963,183
PGE2196	RightLights	\$20,187,107
PGE2194	Energy Fitness Program	\$9,508,003
PGE2197	Small Commercial Comprehensive Program	\$10,142,792
PGE2177	Cooling Optimizer / Enhanced Time Delay	\$1,996,749
PGE2242	Cool Cash	\$1,287,094
PGE2195	Energy Savers Program	\$4,159,026
PGE2232	Mercury Vapor Yard Light Exchange Program	\$3,196,933
Total		\$55,440,887

[End of Appendix C]