

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 13, 2011

Advice Letter 4274

Rasha Prince, Director
Regulatory Affairs
Southern California Gas
555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011

**Subject: Statewide California Solar Initiative – Thermal Program Market
Facilitation Plan and Budget in Compliance with D.10-01-022**

Dear Ms. Prince:

Advice Letter 4274 is effective September 30, 2011.

Sincerely,

A handwritten signature in blue ink that reads "Julie A. Fitch".

Julie A. Fitch, Director
Energy Division



Rasha Prince
Director
Regulatory Affairs

555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011
Tel: 213.244.5141
Fax: 213.244.4957

RPrince@semprautilities.com

August 31, 2011

Advice No. 4274

(Southern California Gas Company – U 904 G)

Advice No. 3233-G/3895-E

(Pacific Gas and Electric Company - U 39 M)

Advice No. 2620-E

(Southern California Edison Company - U 338-E)

Advice No. 19

(California Center for Sustainable Energy)

Public Utilities Commission of the State of California

Subject: Statewide California Solar Initiative - Thermal Program Market Facilitation Plan and Budget in Compliance with Decision (D.) 10-01-022

Southern California Gas Company (SoCalGas), on behalf of itself and the three other California Solar Initiative-Thermal Program (CSI-TP) Administrators (PAs), i.e., Pacific Gas & Electric Co. (PG&E), Southern California Edison Company (SCE), and the California Center for Sustainable Energy (CCSE), for San Diego Gas & Electric Company (SDG&E), hereby submits for filing with the California Public Utilities Commission (Commission) the CSI-TP Solar Water Heating (SWH) Statewide Market Facilitation Plan and Budget in compliance with D.10-01-022, shown as Attachment B.

Purpose

This complies with Energy Division's direction to file a joint advice letter (AL) with only the Statewide Market Facilitation Plan (statewide campaign) and not each of the PAs' Local Market Facilitation Plans (local campaigns). The local campaign ALs are being separately filed concurrent with this filing.

Background

In 2006, the Commission authorized the California Solar Initiative (CSI), a \$2.16 billion statewide incentive program to promote solar development through 2016.¹ The CSI program is funded from the distribution rates of electric ratepayers of Pacific Gas and Electric (PG&E), Southern California Edison Company (SCE) and San Diego Gas & Electric Company (SDG&E). (See D.06-01-024 and D.06-12-033.) The Commission allowed \$100.8 million of total CSI funds to be used for incentives for solar thermal technologies that displaced electricity usage, but deferred allowing SWH technologies to be eligible for CSI until after a pilot program for SWH was conducted in SDG&E's territory.

Starting in July 2007, the California Center for Sustainable Energy (CCSE) administered a \$3 million pilot program for SWH incentives in SDG&E's territory. In D.08-06-029, the Commission made minor modifications to the pilot and allowed it to run until December 31, 2009, or until the budget was exhausted, whichever occurred first.

Also in 2007, the legislature authorized the extension of the solar program funded by natural gas ratepayer with the passage into law of Assembly Bill (AB) 1470,² which authorized the Commission to create a \$250 million incentive program to promote the installation of 200,000 SWH systems on homes and businesses that displace the use of natural gas by 2017. The statute required the Commission to evaluate data from the SWH Pilot Program and determine whether an SWH program was "cost effective for ratepayers and in the public interest" before designing and implementing an incentive program for gas customers.

On January 21, 2010, the Commission established the CSI-TP in D.10-01-022, allocating funds for both natural gas and electric displacing solar thermal system incentives, including SWH technologies in all investor-owned utility territories. The Commission established the incentive structure, the Program Administration details, and other key CSI-TP rules. The Commission designated SoCalGas, PG&E, SCE, and CCSE (for SDG&E's service territory) as the PAs.

The Energy Division issued a Guidance Memo dated November 4, 2010 requesting that the PAs re-file their Market Facilitation Advice Letters in response to the protests and feedback received and present their Revised Market Facilitation Plans at a Public Workshop prior to the re-filings. It also requested that the PAs hire a specialized marketing and outreach firm to manage a statewide campaign building off of the established *Go Solar, California!* campaign.

At the Public Workshop held on Wednesday, August 3, 2011, the specialized marketing and outreach firm hired by the PAs presented the Statewide Market Facilitation plan and each PA presented their revised Local Market Facilitation Plan that integrates with the statewide plan for input from the public and Energy Division staff. During a follow-up conference call between representatives of the Energy Division and the PAs on Thursday, August 11, 2011, it was agreed that each PA would re-file their Local Market Facilitation Plan in a Supplemental Advice Letter and SoCalGas as the Lead Party would file the Statewide Market Facilitation Plan in a new joint Advice Letter by August 31, 2011.

¹ The CSI program was authorized by Public Utilities (PU) Code 2851, created by Senate Bill (SB) 1 (Murray, 2006) with a goal to install 1,940 MW of new solar generation and to help create a sustainable solar industry.

² AB 1470 (Huffman, 2007) was codified as PU Code 2860-2867

The PAs are in the process of finalizing a co-funding agreement to share the costs of hiring a consultant to administer the statewide market facilitation plan. Finalization and full execution of the co-funding agreement by the PAs will be necessary to fully complete the work contemplated by this filing.

Statewide Market Facilitation Plan and Budget

The statewide campaign outlines the approach it will take by noting the goals, strategies, target markets, tactics by market, timetable by category, and budget by category. The statewide campaign is designed to achieve a consistency of messaging, materials, and outreach statewide and integrate with each PAs' local campaigns.

Attachment B contains the Statewide Marketing Plan and Budget as developed by the specialized marketing and outreach firm, in consultation with all four PAs, based on the information available at the time of this filing.

Protest

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received within 20 days of the date of this Advice Letter which is September 20, 2011. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of both Maria Salinas (mas@cpuc.ca.gov) and Honesto Gatchalian (jnj@cpuc.ca.gov) of the Energy Division. A copy of the protest should also be sent via both e-mail and facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Sid Newsom
Tariff Manager - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
Facsimile No. (213) 244-4957
E-mail: snewsom@SempraUtilities.com

Effective Date

SoCalGas believes that this filing is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. SoCalGas respectfully requests that this filing be approved on September 30, 2011, which is 30 calendar days from the date filed.

Notice

A copy of this advice letter is being sent to the parties listed on Attachment A, which includes parties in R.08-03-008.

Rasha Prince
Director – Regulatory Affairs

Attachments

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **SOUTHERN CALIFORNIA GAS COMPANY (U 904G)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Sid Newsom

Phone #: (213) 244-2846

E-mail: SNewsom@semprautilities.com

EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: SCG AL 4274, PG&E AL 3233-G/3895-E, SCE AL 2620-E, CCSE AL 19

Subject of AL: Statewide Solar Water-Heating Market Facilitation Plan and Budget in Compliance with Decision (D.) 10-01-022

Keywords (choose from CPUC listing): Compliance

AL filing type: Monthly Quarterly Annual One-Time Other Periodic

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

D.10-01-022

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL No

Summarize differences between the AL and the prior withdrawn or rejected AL¹: N/A

Does AL request confidential treatment? If so, provide explanation: No

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 9/30/11

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: None

Service affected and changes proposed¹: NA

Pending advice letters that revise the same tariff sheets: None

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division

Attention: Tariff Unit

505 Van Ness Ave.,

San Francisco, CA 94102

mas@cpuc.ca.gov and jnj@cpuc.ca.gov

Southern California Gas Company

Attention: Sid Newsom

555 West 5th Street, GT14D6

Los Angeles, CA 90013-1011

SNewsom@semprautilities.com

¹ Discuss in AL if more space is needed.

ATTACHMENT A

Advice No. 4274, et al.

(See Attached Service Lists)

Alcantar & Kahl
Seema Srinivasan
sls@a-klaw.com

Alcantar & Kahl
Kari Harteloo
klc@a-klaw.com

Alcantar & Kahl LLP
Annie Stange
sas@a-klaw.com

Alcantar & Kahl, LLP
Mike Cade
wmc@a-klaw.com

Barkovich & Yap
Catherine E. Yap
ceyap@earthlink.net

Beta Consulting
John Burkholder
burkee@cts.com

CPUC
Energy Rate Design & Econ.
505 Van Ness Ave., Rm. 4002
San Francisco, CA 94102

CPUC
Pearlie Sabino
pzs@cpuc.ca.gov

CPUC
Consumer Affairs Branch
505 Van Ness Ave., #2003
San Francisco, CA 94102

CPUC - DRA
R. Mark Pocta
rmp@cpuc.ca.gov

California Energy Market
Lulu Weinzimer
luluw@newsdata.com

Calpine Corp
Avis Clark
aclark@calpine.com

City of Azusa
Light & Power Dept.
215 E. Foothill Blvd.
Azusa, CA 91702

City of Banning
Paul Toor
P. O. Box 998
Banning, CA 92220

City of Burbank
Fred Fletcher/Ronald Davis
164 West Magnolia Blvd., Box 631
Burbank, CA 91503-0631

City of Colton
Thomas K. Clarke
650 N. La Cadena Drive
Colton, CA 92324

City of Long Beach, Gas & Oil Dept.
Chris Garner
2400 East Spring Street
Long Beach, CA 90806

City of Los Angeles
City Attorney
200 North Main Street, 800
Los Angeles, CA 90012

City of Pasadena - Water and Power
Dept.
G Bawa
GBawa@cityofpasadena.net

City of Riverside
Joanne Snowden
jsnowden@riversideca.gov

City of Vernon
Dan Bergmann
dan@igservice.com

Commerce Energy
Catherine Sullivan
csullivan@commerceenergy.com

Commerce Energy
Blake Lazusso
blasuzzo@commerceenergy.com

County of Los Angeles
Stephen Crouch
1100 N. Eastern Ave., Room 300
Los Angeles, CA 90063

Crossborder Energy
Tom Beach
tomb@crossborderenergy.com

DGS
Henry Nanjo
Henry.Nanjo@dgs.ca.gov

Davis Wright Tremaine, LLP
Edward W. O'Neill
505 Montgomery Street, Ste 800
San Francisco, CA 94111

Davis, Wright, Tremaine
Judy Pau
judypau@dwt.com

Dept. of General Services
Celia Torres
celia.torres@dgs.ca.gov

Douglass & Liddell
Dan Douglass
douglass@energyattorney.com

Douglass & Liddell
Donald C. Liddell
liddell@energyattorney.com

Downey, Brand, Seymour & Rohwer
Dan Carroll
dcarroll@downeybrand.com

Dynegy
Mark Mickelson
Mark.Mickelson@dynegy.com

Dynegy - West Generation Joseph M. Paul Joe.Paul@dynegy.com	Gas Transmission Northwest Corporation Bevin Hong Bevin_Hong@transcanada.com	General Services Administration Facilities Management (9PM-FT) 450 Golden Gate Ave. San Francisco, CA 94102-3611
Genon Energy, Inc. Greg Bockholt Greg.Bockholt@Genon.com	Goodin, MacBride, Squeri, Ritchie & Day, LLP James D. Squeri jsqueri@gmssr.com	Hanna & Morton Norman A. Pedersen, Esq. npedersen@hanmor.com
Iberdrola Renewables Energy Services Julie Morris Julie.Morris@iberdrolaren.com	Imperial Irrigation District K. S. Noller P. O. Box 937 Imperial, CA 92251	JBS Energy Jeff Nahigian jeff@jbsenergy.com
Kern River Gas Transmission Company Janie Nielsen Janie.Nielsen@KernRiverGas.com	LA County Metro Julie Close closeJ@metro.net	LADWP Robert Pettinato Robert.Pettinato@ladwp.com
LADWP Nevenka Ubavich nevenka.ubavich@ladwp.com	Law Offices of William H. Booth William Booth wbooth@booth-law.com	Luce, Forward, Hamilton & Scripps John Leslie jleslie@luce.com
MRW & Associates Robert Weisenmiller mrw@mrwassoc.com	Manatt Phelps Phillips Randy Keen rkeen@manatt.com	Manatt, Phelps & Phillips, LLP David Huard dhuard@manatt.com
March Joint Powers Authority Lori Stone 23555 Meyer Drive, March Air Reserve Base, CA 92518-2038	National Utility Service, Inc. Jim Boyle One Maynard Drive, P. O. Box 712 Park Ridge, NJ 07656-0712	Navigant Consulting, Inc. Ray Welch ray.welch@navigantconsulting.com
PG&E Tariffs Pacific Gas and Electric PGETariffs@pge.com	Praxair Inc Rick Noger rick_noger@praxair.com	RRI Energy John Rohrbach JRohrbach@rrienergy.com
Regulatory & Cogen Services, Inc. Donald W. Schoenbeck 900 Washington Street, #780 Vancouver, WA 98660	SCE Karyn Gansecki karyn.gansecki@sce.com	Safeway, Inc Cathy Ikeuchi cathy.ikeuchi@safeway.com
Sierra Pacific Company Christopher A. Hilan chilan@sppc.com	Southern California Edison Co Fileroom Supervisor 2244 Walnut Grove Av, 290, GO1 Rosemead, CA 91770	Southern California Edison Co. Kevin Cini Kevin.Cini@SCE.com

Southern California Edison Co.
Colin E. Cushnie
Colin.Cushnie@SCE.com

Southern California Edison Co.
John Quinlan
john.quinlan@sce.com

Southern California Edison Company
Michael Alexander
Michael.Alexander@sce.com

Southwest Gas Corp.
John Hester
P. O. Box 98510
Las Vegas, NV 89193-8510

Suburban Water System
Bob Kelly
1211 E. Center Court Drive
Covina, CA 91724

Sutherland, Asbill & Brennan
Keith McCrea
kmccrea@sablaw.com

TURN
Marcel Hawiger
marcel@turn.org

The Mehle Law Firm PLLC
Colette B. Mehle
cmehle@mehlelaw.com

Western Manufactured Housing
Communities Assoc.
Sheila Day
sheila@wma.org

BIOENERGY SOLUTIONS, LLC
 DAVID ALBERS
 dalbers@americandairyparks.com

ZEROPEX A.S.
 SVEN L. ANDEN
 sa@zeropex.com

GOODIN MACBRIDE SQUERI DAY &
 LAMPREY LLP
 JEANNE B. ARMSTRONG
 jarmstrong@goodinmacbride.com

CALIFORNIA ENERGY COMMISSION
 ROD BAYBAYAN
 rbaybayan@energy.state.ca.us

SUNPOWER CORPORATION
 JULIE BLUNDEN
 julie.blunden@sunpowercorp.com

BROBECK SOLAR ENERGY LLC
 BILL BROBECK
 bill@brobecksolarenergy.com

UTC POWER CORPORATION
 MICHAEL O. BROWN
 Michael.Brown@utcpower.com

A WORLD INSTITUTE FOR
 SUSTAINABLE HUMANI
 SUSAN E. BROWN
 sebesq@comcast.net

THE VOTE SOLAR INITIATIVE
 ADAM BROWNING
 abrowning@votesolar.org

CALIF PUBLIC UTILITIES COMMISSION
 Werner M. Blumer
 wmb@cpuc.ca.gov

CPUC
 MICHAEL COLVIN
 michael.colvin@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Melicia Charles
 mvc@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Laurence Chaset
 lau@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Jeanne Clinton
 cln@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Joe Como
 joc@cpuc.ca.gov

GOODIN MACBRIDE SQUERI DAY &
 LAMPREY LLP
 MICHAEL B. DAY
 mday@goodinmacbride.com

DEBENHAM ENERGY LLC
 SCOTT DEBENHAM
 scott@debenhamenergy.com

PVT SOLAR, INC.,
 KAREN DZIENKOWSKI
 kdzienkowski@pvt solar.com

CALIF PUBLIC UTILITIES COMMISSION
 Dorothy Duda
 dot@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Mona Dzvova
 mdd@cpuc.ca.gov

CALIFORNIA ENERGY COMMISSION
 DEVORAH EDEN
 deden@energy.state.ca.us

EMERSON ENVIRONMENTAL, LLC
 SUZANNE H. EMERSON
 susanne@emersonenvironmental.com

CALIF PUBLIC UTILITIES COMMISSION
 Maryam Ebke
 meb@cpuc.ca.gov

KEYES & FOX LLP
 KEVIN T. FOX
 kfox@keyesandfox.com

CALIF PUBLIC UTILITIES COMMISSION
 Julie A. Fitch
 jf2@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Damon A. Franz
 df1@cpuc.ca.gov

ELLISON SCHNEIDER & HARRIS LLP
 JEDEDIAH J. GIBSON
 jjg@eslawfirm.com

SOUTHERN CALIFORNIA EDISON
 COMPANY
 ANNETTE GILLIAM
 annette.gilliam@sce.com

S.O.L.I.D. USA, INC.
 LORI A. GLOVER
 lglover@solidsolar.com

SUSTAINABLE SPACES, INC.
 MATT GOLDEN
 matt@sustainablespaces.com

NATIONAL ENERGY SOLUTIONS, LLC
 EDRIC F. GUISE
 EGuise@NationalEnergySolutionsLLC.
 com

ENVIRONMENTAL POWER CORP.
 DENNIS HAINES
 haines@westnet.com

LAW OFFICES OF STEPHAN C.
 VOLKER
 JOSHUA HARRIS
 jharris@volkerlaw.com

ELLISON, SCHNEIDER & HARRIS,
L.L.P.
LYNN M. HAUG
lmh@eslawfirm.com

THE UTILITY REFORM NETWORK
MARCEL HAWIGER
marcel@turn.org

TAS
GARY HILBERG
ghilberg@tas.com

PILLSBURY WINTHROP SHAW
PITTMAN LLP
MICHAEL S. HINDUS
michael.hindus@pillsburylaw.com

ASSOCIATION OF CALIFORNIA
COMMUNITY
JAMES L. HODGES
hodgesjl@surewest.net

MORGAN STANLEY CAPITAL GROUP
INC.
STEVEN HUHMAN
steven.huhman@morganstanley.com

HUNT CONSULTING
TAM HUNT
tam.hunt@gmail.com

CALIF PUBLIC UTILITIES COMMISSION
Karin M. Hieta
kar@cpuc.ca.gov

CALIFORNIA ENERGY COMMISSION
MELISSA JONES
1516 9TH STREET, MS-39
SACRAMENTO, CA 95814

WINSTON & STRAWN LLP
JOE KARP
jkarp@winston.com

CAL. BLDG. PERFORMANCE
CONTRATORS ASSN.
ROBERT L. KNIGHT
rknight@bki.com

PYRAMID SOLAR INC.
MATTHEW KOBER
mkober@pyramidsolar.com

MICHAEL KYES
michaelkyes@sbcglobal.net

WASTE HEAT SOLUTIONS
HANK M. LEIBOWITZ
hank@wasteheatsol.com

DOUGLASS & LIDDELL
DONALD C. LIDDELL
liddell@energyattorney.com

PACIFIC GAS AND ELECTRIC
COMPANY
RANDALL J. LITTENEKER
rjl9@pge.com

CALIF PUBLIC UTILITIES COMMISSION
Robert Levin
rl4@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
James Loewen
loe@cpuc.ca.gov

GRID ALTERNATIVES
ERICA MACKIE, P.E.
emackie@gridalternatives.org

CALIF. SOLAR ENERGY INDUSTRIES
ASSN.
MIGNON MARKS
info@calseia.org

TECOGEN INC. - WESTERN OFFICE
WILLIAM R. MARTINI
william.martini@tecogen.com

SOPOGY, INC
JIM MASKREY
jmaskrey@sopogy.com

BIOFUELS ENERGY LLC
FRANK J. MAZANEC
fmazanec@biofuelsenergyllc.com

CALIFORNIA CENTER FOR
SUSTAINABLE ENERGY
ANDREW MCALLISTER
andrew.mcallister@energycenter.org

CALIFORNIA ENERGY COMMISSION
SANDY MILLER
smiller@energy.state.ca.us

SOUTHERN CALIFORNIA EDISON
COMPANY
MICHAEL D. MONTOYA
mike.montoya@sce.com

GREEN POWER INSTITUTE
GREGG MORRIS
gmorris@emf.net

CITY & COUNTY OF SAN FRANCISCO
STEPHEN A. S. MORRISON
CITY HALL, SUITE 234
1 DR CARLTON B. GOODLET PLACE
SAN FRANCISCO, CA 94102-4682

CLEAN POWER SYSTEMS
KIRK MULLIGAN
kirk@NoElectricBill.com

SARA STECK MYERS
ssmyers@att.net

CALIF PUBLIC UTILITIES COMMISSION
Candace Morey
cjm@cpuc.ca.gov

CALIFORNIA ENERGY COMMISSION
PAYAM NARVAND
pnarvand@energy.state.ca.us

CALIFORNIA ENERGY COMMISSION
FARAKH NASIM
fnasim@energy.state.ca.us

**SAN DIEGO GAS AND ELECTRIC
COMPANY**
STEVEN D. PATRICK
SDPatrick@SempraUtilities.com

CALIFORNIA AIR RESOURCES BOARD
GEORGE POPPIC
gpoppic@arb.ca.gov

PROCTOR ENGINEERING GROUP, LTD
JOHN PROCTOR
john@proctoreng.com

CALIF PUBLIC UTILITIES COMMISSION
Karen P. Paull
kpp@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Lisa Paulo
lp1@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
David Peck
dbp@cpuc.ca.gov

CAPSTONE TURBINE CORPORATION
JUSTIN RATHKE
jrathke@capstoneturbine.com

ENERGY EFFICIENCY SOLAR
LISA ROSEN
lrosen@eesolar.com

CALIF PUBLIC UTILITIES COMMISSION
Amy Reardon
arr@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Neal Reardon
nrm@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Thomas Roberts
tcr@cpuc.ca.gov

ALCANTAR & KAHL, LLP
NORA SHERIFF
nes@a-klaw.com

JAS ENERGIES
JULIA A. SOUDER
julia@jasenergies.com

LOCAL GOVERNMENT COMMISSION
G. PATRICK STONER
pstoner@lgc.org

CALIF PUBLIC UTILITIES COMMISSION
Andrew Schwartz
as2@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Melissa K. Semcer
unc@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Anne E. Simon
aes@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Merideth Sterkel
mts@cpuc.ca.gov

**SANYO NORTH AMERICA
CORPORATION**
SHIN TANIMOTO
stanimoto@sna.sanyo.com

ABENGOA SOLAR IST
PETER THOMPSON
peter.thompson@solar.abengoa.com

DAY CARTER & MURPHY LLP
ANN L. TROWBRIDGE
atrowbridge@daycartermurphy.com

CALIFORNIA ENERGY COMMISSION
DAVID VIDAVER
dvidaver@energy.state.ca.us

SUNFUND CORPORATION
PO BOX 3206
LOS ALTOS, CA 94024

FLUIDIC ENERGY
KATIE AVILA
kavila@mac.com

BARKOVICH & YAP, INC.
BARBARA R. BARKOVICH
brbarkovich@earthlink.net

CALIFORNIA ENERGY COMMISSION
ROD BAYBAYAN
rbaybayan@energy.state.ca.us

ORMAT
LANCE BELL
lbell@ormat.com

SUNPOWER CORPORATION
JULIE BLUNDEN
julie.blunden@sunpowercorp.com

THE DOLPHIN GROUP
MICHAEL BOCCADORO
mboccardo@dolphingroup.org

ALCANTAR & KAHL
WILLIAM H. BOOTH
whb@a-klaw.com

BROBECK SOLAR ENERGY LLC
BILL BROBECK
bill@brobecksolarenergy.com

BALLARD POWER SYSTEMS
ETHAN BROWN
Ethan.Brown@Ballard.com

UTC POWER CORPORATION
MICHAEL O. BROWN
Michael.Brown@utcpower.com

A WORLD INSTITUTE FOR
SUSTAINABLE HUMANI
SUSAN E. BROWN
sebesq@comcast.net

THE VOTE SOLAR INITIATIVE
ADAM BROWNING
abrowning@votesolar.org

STAPLES, INC.
MARK F. BUCKLEY
500 STAPLES DR.
FRAMINGTON, MA 01702

CALIF PUBLIC UTILITIES COMMISSION
Werner M. Blumer
wmb@cpuc.ca.gov

LEVA ENERGY, INC.
FRANCO CASTALDINI
franco.castaldini@levaenergy.com

CPUC
MICHAEL COLVIN
michael.colvin@cpuc.ca.gov

PLUG POWER INC.
SHARALYN S. CONNER
Sharalyn_Conner@plugpower.com

CALIF PUBLIC UTILITIES COMMISSION
Melicia Charles
mvc@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Jeanne Clinton
cln@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Joe Como
joc@cpuc.ca.gov

GOODIN MACBRIDE SQUERI DAY &
LAMPREY LLP
MICHAEL B. DAY
mday@goodinmacbride.com

DEBENHAM ENERGY LLC
SCOTT DEBENHAM
scott@debenhamenergy.com

SOLFOCUS, INC.
KELLY DESY
kelly_desy@solfocus.com

CPUC
WILLIAM DIETRICH
dietrichlaw2@earthlink.net

DOUGLASS & LIDDELL
DANIEL W. DOUGLASS
douglass@energyattorney.com

PVT SOLAR, INC.,
KAREN DZIENKOWSKI
kdzienkowski@pvtsolar.com

CALIF PUBLIC UTILITIES COMMISSION
Dorothy Duda
dot@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Mona Dzvova
mdd@cpuc.ca.gov

CALIFORNIA ENERGY COMMISSION
DEVORAH EDEN
deden@energy.state.ca.us

EMERSON ENVIRONMENTAL, LLC
SUZANNE H. EMERSON
susanne@emersonenvironmental.com

CAL. WASTEWATER CLIMATE
CHANGE GROUP
ZEYNEP ERDAL
zeynep.erdal@ch2m.com

CLEARPOWER SYSTEMS, INC.
LEIGH ESTUS
leighestus@sbcglobal.net

CALIF PUBLIC UTILITIES COMMISSION
Maryam Ebke
meb@cpuc.ca.gov

KEYES & FOX LLP
KEVIN T. FOX
kfox@keyesandfox.com

UTC POWER CORPORATION
KATHRINA FRITZ INTWALA
katrina.fritzintwala@utcpower.com

NTT AMERICA
SATORU FUJIMOTO
satoru.fujimoto@ntta.com

CALIF PUBLIC UTILITIES COMMISSION
Julie A. Fitch
jf2@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Damon A. Franz
df1@cpuc.ca.gov

CALIFORNIA ENERGY COMMISSION
ASISH GAUTAM
Agautam@energy.state.ca.us

ELLISON SCHNEIDER & HARRIS LLP
JEDEDIAH J. GIBSON
jjg@eslawfirm.com

SOUTHERN CALIFORNIA EDISON
COMPANY
ANNETTE GILLIAM
annette.gilliam@sce.com

S.O.L.I.D. USA, INC.
LORI A. GLOVER
lglover@solidsolar.com

SUSTAINABLE SPACES, INC.
MATT GOLDEN
matt@sustainablespaces.com

GOODWIN SELF ECO CONSULTING,
LLC
NICK GOODWIN SELF
info@goodwin-self.com

NATIONAL ENERGY SOLUTIONS, LLC
EDRIC F. GUISE
EGuise@NationalEnergySolutionsLLC.com

ENVIRONMENTAL POWER CORP.
DENNIS HAINES
haines@westnet.com

LAW OFFICES OF STEPHAN C.
VOLKER
JOSHUA HARRIS
jharris@volkerlaw.com

ELLISON, SCHNEIDER & HARRIS,
L.L.P.
LYNN M. HAUG
lmh@eslawfirm.com

THE UTILITY REFORM NETWORK
MARCEL HAWIGER
marcel@turn.org

TECHNOLOGY NETWORK
JIM HAWLEY
jhawley@technet.org

TAS
GARY HILBERG
ghilberg@tas.com

PILLSBURY WINTHROP SHAW
PITTMAN LLP
MICHAEL S. HINDUS
michael.hindus@pillsburylaw.com

ASSOCIATION OF CALIFORNIA
COMMUNITY
JAMES L. HODGES
hodgesjl@surewest.net

REDWOOD RENEWABLES/CARE
MARTIN HOMEC
martinhomec@gmail.com

ASSOCIATION OF CAL WATER
AGENCIES
LON W. HOUSE, PH.D
lwhouse@innercite.com

MORGAN STANLEY CAPITAL GROUP
INC.
STEVEN HUHMAN
steven.huhman@morganstanley.com

CALIF PUBLIC UTILITIES COMMISSION
Karin M. Hieta
kar@cpuc.ca.gov

CALIFORNIA ENERGY COMMISSION
MELISSA JONES
1516 9TH STREET, MS-39
SACRAMENTO, CA 95814

WINSTON & STRAWN LLP
JOE KARP
jkarp@winston.com

CALIFORNIA ENERGY COMMISSION
LINDA KELLY
lkelly@energy.state.ca.us

CAL. BLDG. PERFORMANCE
CONTRATORS ASSN.
ROBERT L. KNIGHT
rknight@bki.com

GLOBAL WORKPLACE SOLUTIONS
RANDALL H. KNOX, III
rknox@adobe.com

PYRAMID SOLAR INC.
MATTHEW KOBER
mkober@pyramidsolar.com

CALIFORNIA ENERGY COMMISSION
PRAMOD P. KULKARNI
pkulkarn@energy.state.ca.us

MICHAEL KYES
michaelkyes@sbcglobal.net

POWERGETICS, INC.
CHRIS LAVERY
chris.lavery@powergetics.com

WASTE HEAT SOLUTIONS
HANK M. LEIBOWITZ
hank@wasteheatsol.com

LUCE, FORWARD, HAMILTON &
SCRIPPS, LLP
JOHN W. LESLIE, ESQ.
jleslie@luce.com

AC TRANSIT
JAIMIE LEVIN
jlevin@actransit.org

DOUGLASS & LIDDELL
DONALD C. LIDDELL
liddell@energyattorney.com

ASSEMBLY NAT. RESOURCES
COMMITTEE
LAWRENCE LINGBLOOM
lawrence.lingbloom@asm.ca.gov

WESTINGHOUSE SOLAR
ANGELA LIPANOVICH
alipanovich@westinghousesolar.com

US DOE PACIFIC REGION CLEAN
ENERGY CTR.
TIMOTHY LIPMAN
telipman@berkeley.edu

PACIFIC GAS AND ELECTRIC
COMPANY
RANDALL J. LITTENEKER
rjl9@pge.com

JODY LONDON CONSULTING
JODY LONDON
jody_london_consulting@earthlink.net

ALPHABET ENERGY INC.
ADAM LORIMER
adam@alphabetenergy.com

CALIF PUBLIC UTILITIES COMMISSION
Diana L. Lee
dil@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Robert Levin
rl4@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
James Loewen
loe@cpuc.ca.gov

GRID ALTERNATIVES
ERICA MACKIE, P.E.
emackie@gridalternatives.org

CALIF. SOLAR ENERGY INDUSTRIES
ASSN.
MIGNON MARKS
info@calseia.org

TECOGEN INC. - WESTERN OFFICE
WILLIAM R. MARTINI
william.martini@tecogen.com

BIOFUELS ENERGY LLC
FRANK J. MAZANEC
fmazanec@biofuelsenergyllc.com

CALIFORNIA CENTER FOR
SUSTAINABLE ENERGY
ANDREW MCALLISTER
andrew.mcallister@energycenter.org

POWERWORKS WIND TURBINES LLC
RYAN MCGRAW
rm@powerworks.com

NOKIA CORPORATION
CHARLES MEACHUM
charles.meachum@nokia.com

CALIFORNIA ENERGY COMMISSION
SANDY MILLER
smiller@energy.state.ca.us

CALIFORNIA FARM BUREAU
FEDERATION
KAREN NORENE MILLS
kmills@cxfb.com

GREEN POWER INSTITUTE
GREGG MORRIS
gmorris@emf.net

CITY & COUNTY OF SAN FRANCISCO
STEPHEN A. S. MORRISON
CITY HALL, SUITE 234
1 DR CARLTON B. GOODLET PLACE
SAN FRANCISCO, CA 94102-4682

DAVIS WRIGHT TREMAINE LLP
JESSICA MULLAN
jessicamullan@dwt.com

COMMUNITY COLLEGE LEAGUE OF
CALIFORNIA
CLYDE MURLEY
cmurley@cclleague.org

SARA STECK MYERS
ssmyers@att.net

CALIF PUBLIC UTILITIES COMMISSION
Rahmon Momoh
rmm@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Scott Murtishaw
sgm@cpuc.ca.gov

CALIFORNIA ENERGY COMMISSION
PAYAM NARVAND
pnarvand@energy.state.ca.us

CALIFORNIA ENERGY COMMISSION
 FARAKH NASIM
 fnasim@energy.state.ca.us

CALIFORNIA ENERGY COMMISSION
 BRYAN NEFF
 BNeff@energy.state.ca.us

SD GAS AND ELECTRIC CO / SOCAL
 GAS CO
 STEVEN D. PATRICK
 SDPatrick@SempraUtilities.com

OWL POWER COMPANY
 JAMES PERET
 jperet@vegawatt.com

FLEXENERGY
 JOSEPH PERRY
 government.affairs@flexenergy.com

CPUC
 RACHEL PETERSON
 Rachel.Peterson@cpuc.ca.gov

PROCTOR ENGINEERING GROUP, LTD
 JOHN PROCTOR
 john@proctoreng.com

CALIF PUBLIC UTILITIES COMMISSION
 Lisa Paulo
 lp1@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 David Peck
 dbp@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Rachel Ann Peterson
 rp1@cpuc.ca.gov

FULL CIRCLE RENEWABLES, LLC
 JAMES M. QUAN
 jqvan@fullcirclerenewables.com

CAPSTONE TURBINE CORPORATION
 JUSTIN RATHKE
 jrathke@capstoneturbine.com

ENERGY EFFICIENCY SOLAR
 LISA ROSEN
 lrosen@eesolar.com

CALIF PUBLIC UTILITIES COMMISSION
 Amy Reardon
 arr@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Neal Reardon
 nmr@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Thomas Roberts
 tcr@cpuc.ca.gov

NATIONAL FUEL CELL RESEARCH
 CENTER
 SCOTT SAMUELSEN
 gss@uci.edu

GUARDIAN INDUSTRIES CORP -
 KINGSBURG
 RENE SANTOS
 rsantos@guardian.com

HYDROVOLTS
 RACHEL SAPERSTEIN
 Rachels@hydrovolts.com

EVERYDAY ENERGY
 SCOTT SAREM
 scott@everydayenergy.us

CALIFORNIA ENERGY COMMISSION
 PATRICK SAXTON
 psaxton@energy.state.ca.us

SUNEDISON LLC
 CURTIS SEYMOUR
 cseymour@sunedison.com

RECOLTE ENERGY
 GOPAL SHANKER
 gopal@recolteenergy.com

ALCANTAR & KAHL, LLP
 NORA SHERIFF
 nes@a-klaw.com

SILVERMAN & LIGHT, INC.
 CHARLES SILVERMAN
 chuck@silvermanlight.com

ETAGEN, INC.
 ADAM SIMPSON
 adam.simpson@etagen.com

SILICON VALLEY LEADERSHIP
 GROUP
 ANNE SMART
 asmart@svlg.org

NOVA PARTNERS, INC
 JESSE SMITH
 jesse@novapartners.com

CITY AND COUNTY OF SAN
 FRANCISCO
 JEANNE M. SOLE
 jeanne.sole@sfgov.org

JAS ENERGIES
 JULIA A. SOUDER
 julia@jasenergies.com

ALCANTAR & KAHL LLP
 SEEMA SRINIVASAN
 sls@a-klaw.com

SOLARCITY CORPORATION
 JOHN M. STANTON
 jstanton@solarcity.com

SOPOGY
 MATT STONE
 mstone@sopogy.com

LOCAL GOVERNMENT COMMISSION
G. PATRICK STONER
pstoner@lgc.org

CALIF PUBLIC UTILITIES COMMISSION
Andrew Schwartz
as2@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Anne E. Simon
aes@cpuc.ca.gov

SANYO NORTH AMERICA
CORPORATION
SHIN TANIMOTO
stanimoto@sna.sanyo.com

ABENGOA SOLAR IST
PETER THOMPSON
peter.thompson@solar.abengoa.com

TRINCHERO FAMILY ESTATES
BOB TORRES
btorres@tfewines.com

DAY CARTER & MURPHY LLP
ANN TROWBRIDGE
ATrowbridge@DayCarterMurphy.com

DAY CARTER & MURPHY LLP
ANN L. TROWBRIDGE
atrowbridge@daycartermurphy.com

CITY OF SAN JOSE
MARY TUCKER
mary.tucker@sanjoseca.gov

LAW OFFICES OF S. GARY VARGA
S. GARY VARGA
vargalaw@MBAY.net

LAW OFFICES OF S. GARY VARGA
S. GARY VARGA
vargalaw@MBAY.NET

CALIFORNIA ENERGY COMMISSION
DAVID VIDAVER
dvidaver@energy.state.ca.us

TAS ENERGY
KELSEY M. WALKER
kelsey@heatispower.org

LOCKHEED MARTIN CORPORATION
JENNIFER A. WARREN
Jennifer.warren@lmco.com

FUEL CELL AND HYDROGEN ENERGY
ASSN.
ROBERT WICHERT
Wichert@fchea.org

FOUNDATION WINDPOWER
MATTHEW B. WILSON
matt.wilson@foundationwindpower.com

SOUTHERN CALIFORNIA GAS
COMPANY
HUGH YAO
HYao@SempraUtilities.com

ATTACHMENT B

Advice No. 4274, et al.

**California Solar Initiative - Thermal Program
Statewide Market Facilitation Plan and Budget (2011-2013)**

California Solar Initiative - Thermal Program Statewide Market Facilitation Plan and Budget (2011-2013)

Background

In its Guidance Memo dated November 4, 2010, Energy Division staff recommended that the four Program Administrators (PAs) of the CSI-Thermal Program, i.e., Southern California Gas Company (SoCalGas), Pacific Gas & Electric Company (PG&E), California Center for Sustainable Energy (CCSE), and Southern California Edison Company (SCE), “hire a specialized marketing and outreach firm to manage a statewide campaign building off the established *Go Solar, California!* campaign”. The staff also recommended that each of the PAs contribute 40% of the first two years of their marketing facilitation budgets (\$5 million) to fund statewide efforts.

In March 2011, SoCalGas, acting as Lead Party for the PAs, issued a Request for Proposals (RFP) for a statewide marketing campaign budgeted at \$4.5 million, with the other \$500,000 to be held in reserve for additional statewide efforts to be determined. After the RFP submittal and review process, SoCalGas, in consultation with the other three PAs, selected Fraser Communications as the successful bidder for the campaign in June 2011. The four PAs jointly developed a Scope of Work for the campaign designed to address the issues noted in D.10-01-022 and the Guidance Memo.

Based on the Scope of Work and input from the PAs as managed by SoCalGas, Fraser Communications developed a Statewide Market Facilitation Plan. The Plan outlines the approach that the statewide campaign will take by noting Goals, Strategies, Target Markets, Tactics by Market, Timetables by Category, and Budget by Category. The Plan is designed to achieve a consistency of messaging, materials, and outreach statewide and integrate with each PA’s local market facilitation plan.

The Statewide Market Facilitation Plan and the Local Market Facilitation Plans of each of the four PAs were the subject of a Public Workshop conducted by Energy Division staff at the CPUC building at 505 Van Ness Avenue in San Francisco, California, on Wednesday, August 3, 2011. Energy Division staff was provided with a copy of the PowerPoint Presentations prepared for the workshop on August 1, 2011, per their request. A representative of Fraser Communications presented the Statewide Plan, and a representative of each PA presented their Local Plan individually. Input and comments from Energy Division staff, stakeholders, and the public were taken at the workshop, and some modifications have been made to the Statewide Plan accordingly.

During a follow-up conference call between representatives of the Energy Division and the PAs on Thursday, August 11, 2011, it was agreed that each PA would re-file their Local Market Facilitation Plan in a Supplemental Advice Letter and SoCalGas as the Lead Party would file the Statewide Market Facilitation Plan in a new joint Advice Letter by August 31, 2011.

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Goals

The goals of the Statewide Market Facilitation Plan are to work in conjunction with the Local Market Facilitation Plans to build awareness and increase understanding of:

- 1) Solar water heating and the California Solar Initiative – Thermal Program;
- 2) Solar water heating technology;
- 3) The advantages and availability of CSI-TP rebates; and
- 4) The advantages of adopting streamlined permitting processes, minimal fee structures and financing solar hot water systems

to increase the number of rebate applications statewide.

Target Markets

- 1) Contractors and installers
- 2) Commercial enterprise operators
- 3) Industrial facilities managers
- 4) Multifamily property owners
- 5) Single-family residence homeowners

Strategies

- 1) Conduct pre-campaign research to assess consumer awareness and understanding of SWH technologies
- 2) Establish metrics for goals
- 3) Develop and implement statewide paid and earned media campaigns
- 4) Participate in local consumer, trade and community outreach events
- 5) Conduct and assess post-campaign research to track and evaluate changed awareness levels, attitudes and behaviors

Tactics – Research

- 1) Building on the ITRON-CCSE study:
 - A. Conduct 2-hour input sessions with Contractors and Installers
 - i. One group each in Northern and Southern California (10-12 participants in each group)
 - B. Conduct pre-campaign awareness study of solar water heating and the CSI-Thermal Program to obtain a benchmark
 - C. Conduct a post-campaign awareness study

Tactics – Campaign Development

- 1) Develop a Statewide Brand Positioning Statement that establishes a Solar Water Heating identity

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Tactics – Campaign Development (Continued)

- 2) Devise Solar Water Heating branding guidelines to ensure consistency of style in materials
- 3) Develop and design statewide brochures, consumer guide and other print pieces to educate and inform the public
- 4) Develop updated California Solar Initiative –Thermal Program landing page
 - A. Link to each of the four Program Administrators’ Solar Water Heating website pages

Tactics – Single-Family

- 1) Develop media plan that delivers messaging through multiple touch points
 - A. Radio Advertising Flight
 - i. Develop, design, and create radio spots
 - ii. Utilize radio stations and networks that reach listeners in our target markets and are influential cultural and social trendsetters
 - iii. Employ 4-6 week schedules during the course of the program in top markets (Los Angeles, San Francisco and San Diego areas)
 - B. Targeted Cable TV Advertising Flight
 - i. Develop, design, and create TV spots
 - ii. Target areas that already use solar photovoltaic (PV) technology by utilizing zip code data
 - iii. Deploy a 4-6 week cable media buy in key areas (Los Angeles, Bay Area, San Diego)
 - iv. Be present on target-appropriate and relevant educational and lifestyle-oriented networks
 - C. Develop and Implement a Digital Advertising Effort
 - i. Utilize targeted digital media to deliver messaging to California homeowners
- 2) Develop, design and distribute brochures to educate homeowners
 - A. Distribute via local program administrator workshops, on solar water heating section of program administrators’ websites, and at events
- 3) Support local workshops with an Experiential Marketing approach to bring SWH directly to consumers
 - A. Develop an eye-catching, traveling visual demonstration presentation that provides a memorable introduction to solar water heating
 - B. Use zip code data to build demonstration schedule at venues frequented by likely consumers
 - C. Ensure engagement event staff are trained to deliver key messages on rebate opportunities and distribute collateral
 - D. Execute local paid media buys and use web calendar placements to promote workshops
- 4) Grass roots and earned media outreach
 - A. Leverage events in local media pitching to garner coverage
 - B. Identify and support statewide local consumer and community event sponsorship efforts
 - C. Distribute statewide materials at events to increase visibility among likely consumers
 - i. Environmental
 - ii. Home improvement

California Solar Initiative - Thermal Program Statewide Market Facilitation Plan and Budget (2011-2013)

Tactics – Single-Family (Continued)

- 5) Social media outreach
 - A. Develop strategic social media recommendations that complement paid and earned media initiatives
- 6) Seek Point-of-Sale outreach opportunities with home-improvement centers
 - A. Contractors
 - B. Self-installers

Tactics – Multifamily

- 1) Develop, design and place ads in trade publications
- 2) Develop, design and distribute statewide brochure
 - A. Distribute via targeted direct mail, local Program Administrator workshops, on solar water heating section of PA's websites
- 3) Identify and support statewide and local trade show event sponsorship efforts and association sponsorships
- 4) Support local workshops and meetings
 - A. Use "Go Solar California" and other web calendar placements to promote workshops
 - B. Leverage workshops and success stories in media pitching to garner earned trade press coverage

Tactics – Commercial/Industrial

- 1) Develop, design and place ads in trade publications
 - A. Targeted at businesses that utilize large amounts of hot water
- 2) Digital advertising
 - A. Deploy targeted digital media within key business and commercial verticals utilizing business oriented publication websites to reach decision makers
 - B. Geo-targeted to commercial property owners in California and pulsed throughout the year
 - C. Display advertising, e-mail newsletters and dedicated e-mails across industry trade websites within areas like commercial real estate, food services, and corporate sustainability
- 3) Develop, design and distribute statewide brochure to build awareness of solar water heating and explain the rebate program
 - A. Distribute via local Program Administrator workshops, at statewide and local events, and on solar water heating section of PA's websites
- 4) Support local workshops aimed at Commercial Enterprise Operators and Industrial Facilities Managers
 - A. Use "Go Solar California" and other web calendar placements to promote workshops
 - B. Leverage workshops in media pitching to garner earned trade press coverage
- 5) Identify and participate in statewide and local business and industry trade shows and association events
 - A. Identify and develop business event opportunities and industry events

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Tactics – Contractors/Installers

- 1) Promote local Contractor/Self-installer Training Workshops
 - A. Website landing pages
 - B. Explore earned media opportunities in key trade publications

Timetable – Research – Table 1

	3Q11	4Q11	1Q12	2Q12	3Q12	4Q12	1Q13	2Q13
Formative								
<i>Planning</i>								
<i>In-market/Live</i>								
<i>Reporting</i>								
Pre-Campaign								
<i>Planning</i>								
<i>In-market/Live</i>								
<i>Reporting</i>								
Post- Campaign								
<i>Planning</i>								
<i>In-market/Live</i>								
<i>Reporting</i>								

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Timetable – Media – Table 2

	3Q11	4Q11	1Q12	2Q12	3Q12	4Q12	1Q13	2Q13
Broadcast								
<i>Planning</i>								
<i>Development</i>								
<i>Production</i>								
<i>In-market/Live</i>								
Digital								
<i>Planning</i>								
<i>Development</i>								
<i>Production</i>								
<i>In-market/Live</i>								
Search Engine Optimization (SEO)								
<i>Planning</i>								
<i>Development</i>								
<i>Production</i>								
<i>In-market/Live</i>								
Print Ads								
<i>Planning</i>								
<i>Development</i>								
<i>Production</i>								
<i>In-market/Live</i>								
Brochures								
<i>Planning</i>								
<i>Development</i>								
<i>Production</i>								
<i>In-market/Live</i>								
Earned Media								
<i>Planning</i>								
<i>Development</i>								
<i>Production</i>								
<i>In-market/Live</i>								

**California Solar Initiative - Thermal Program
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Timetable – Events & Workshops – Table 3

	3Q11	4Q11	1Q12	2Q12	3Q12	4Q12	1Q13	2Q13
Workshop Support								
<i>Planning</i>								
<i>Development</i>								
<i>In-market/Live</i>								
Experiential Event								
<i>Planning</i>								
<i>Development</i>								
<i>In-market/Live</i>								
Home Improvement Center Outreach								
<i>Planning</i>								

Budget by Category – Table 4

Task 1: Management and Reporting	
Agency Fees: Account Service, Accounting	\$ 153,047
Task 2: Market Research	
Hard Costs	\$ 268,500
Agency Fees: Research, Account Planning	\$ 48,824
Task 3: Campaign and Partnership Development	
Agency Fees: Creative development, Public Relations planning and reporting, Media research, planning, buying, traffic, optimization, reconciliation and reporting	\$ 274,216
Task 4: Campaign Production and Implementation	
Hard Costs	\$ 3,337,000
Agency Fees: Public Relations/Experiential and Social media implementation, SEO writing, optimization and reporting, Studio production, Production management and Print supervision	\$ 418,413
Total	\$ 4,500,000

California Solar Initiative - Thermal Program Statewide Market Facilitation Plan and Budget (2011-2013)

Appendix I - Agency Tasks Identification

Task 1 – Management & Reporting

This task includes all of the fees required to manage and prepare:

- 1) Campaign planning meetings
- 2) Monthly update meetings
- 3) Ongoing daily project management for all tasks
- 4) Budget development and stewardship
- 5) Quarterly reports
- 6) Creative brief development
- 7) Conference reports
- 8) Monthly invoicing

Teams included in this task are:

- 1) Account Service
- 2) Accounting

Task 2 – Market Research

This task includes all of the fees and hard costs required to develop and facilitate:

- 1) Define the target audiences/markets
- 2) Consumer focus groups to measure messaging effectiveness
- 3) Commercial/Multifamily focus groups
- 4) Quantitative pre- and post-research awareness, understanding and adoption studies
- 5) Messaging and campaign assessment reports and presentations

Teams included in this task are:

- 1) Research
- 2) Account Planning

Task 3 – Campaign and Partnership Development

This task includes all of the fees required to develop:

- 1) Marketing plan
 - A. Marketing materials - Collateral, brochures, promotional items
 - B. SEO strategy
 - C. Social media strategy
- 2) Media plan
 - A. Identify media targets
 - B. Develop paid media mix (TV, radio, out-of-home, print, digital, search, social)
- 3) Public relations/earned media and experiential plan
 - A. Identification of media outreach that may include:
 - i. Consumer Press
 - ii. Trade Press
 - iii. Community events
- 4) Messaging and visual framework
- 5) Develop targeted media lists
- 6) Develop stakeholder /partnership opportunities

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Task 3 – Campaign and Partnership Development (continued)

- 7) Creative development that may include:
 - A. TV
 - B. Radio
 - C. Out-of-home
 - D. Print (Consumer and Trade)
 - E. Online
 - F. Search
 - G. Social
 - H. Collateral/brochures/promotional

Teams included in this task are:

- 1) Creative Development
- 2) Public Relations Planning and Reporting
- 3) Media Research, Planning, Buying, Traffic, Optimization, Reconciliation and Reporting

Task 4 – Campaign Production and Implementation

This task includes all of the fees and hard costs/media required to develop and execute:

- 1) PR events and outreach
- 2) Collateral and promotional items
- 3) SEO writing, optimization and reporting
- 4) Stock photography, proofs, printing
- 5) Digital programming
- 6) Paid media
- 7) Earned media

Teams included in this task are:

- 1) Public Relations / Experiential and Social Media
- 2) Search Optimization
- 3) Studio Production
- 4) Production Management and Print Supervision