Proceeding: A.26-03-
Exhibit No.: I-REN-01
Date: March 16, 2026
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I-REN
Exhibit 1: 2028-2031 Portfolio Plan and 2032-2035 Business Plan

Inland Regional Energy Network

Exhibit 1: 2028-2031 Portfolio Plan and 2032-2035 Business Plan

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Acronyms and Abbreviations

AB	Assembly Bill
ACS	American Community Survey
AKAB	Awareness, Knowledge, Attitudes, and Behavior
AL	Advice Letter
BPA	Business Plan Application
BUC	Building Upgrade Concierge
C&S	Codes & Standards
CAEECC	California Energy Efficiency Coordinating Committee
CalREN	California Regional Energy Networks
CARE	California Alternate Rates for Energy
CCA	Community Choice Aggregator
CCEC	California Climate and Energy Collaborative
CEC	California Energy Commission
CJUSD	Colton Joint Unified School District
COG	Council of Government
COL	Conclusion of Law
CPUC or Commission	California Public Utilities Commission
CSU	California State University
CVAG	Coachella Valley Association of Governments
D.	Decision
DAC	Disadvantaged Community
DCE	Desert Community Energy
DER	Distributed energy resource
DR	Demand response
E&MS	Equity and market support
ED	Energy Division
EE	Energy efficiency
EECBG	Energy Efficiency and Conservation Block Grant

ERR	Energy Resiliency Roadmapping
ESA	Energy Savings Assistance
ESJ	Environmental and Social Justice
ESPM	Energy Star Portfolio Manager
ETA	Elect to Administer
FERA	Family Electric Rate Assistance
FOF	Finding of Fact
GHG	Greenhouse gas
HPWH	Heat pump water heater
HTR	Hard-to-reach
IDSM	Integrated demand-side management
IE	Inland Empire
IELCC	Inland Empire Labor and Community Center
IML	Initial Measures List
IOU	Investor-owned utility
I-REN	Inland Regional Energy Network
JCM	Joint Cooperation Memorandum
LGSEC	Local Government Sustainable Energy Coalition
LIOB	Low-Income Oversight Board
MR NEBs	Market Rate Non-Energy Benefits
MSA	Metropolitan Statistical Area
NEB	Non-energy benefit
NMEC	Normalized Metering Energy Consumption
OIR	Order Instituting Rulemaking
OP	Ordering Paragraph
PA	Portfolio Administrator
PPP	Public Purpose Program
PSPS	Public Safety Power Shutoff
SBCOG	San Bernardino Council of Governments
SCAG	Southern California Association of Governments

SCE	Southern California Edison
SEEC	Statewide Energy Efficiency Collaborative
SoCalGas	Southern California Gas
TA	Technical Assistance
TOU	Time-of-use
TRC	Total Resource Cost
UC	University of California
WE&T	Workforce Education & Training
WRCOG	Western Riverside Council of Governments

I. Chapter 1: Executive Summary

A. I-REN Overview

Initiated in 2019, the Inland Regional Energy Network (I-REN) is a consortium of the Western Riverside Council of Governments (WRCOG), Coachella Valley Association of Governments (CVAG), and San Bernardino Council of Governments (SBCOG).

Collectively known as the Inland Empire (IE), the I-REN service area of Riverside and San Bernardino counties includes 12% of California's population and comprises approximately 17% of California's land area. However, its geographic arrangement is characterized by topographic barriers and highly varying terrain, with rural and low-density population areas located far from the state's major metropolitan centers. This has resulted in inconsistent and insufficient service to the region. Further, this rapidly growing region is distinct from other southern California areas—particularly Los Angeles—with its own robust character, culture, and identity.

Historically, the Inland Empire has faced challenges in receiving equitable access to energy efficiency (EE) and the advanced energy economy. As dedicated representatives of local government, I-REN consortium members were approved for REN portfolio administrator (PA) status in 2021. With the implementation of its first business plan in 2022-2027, I-REN is establishing locally administered programs and services to ensure ratepayers in this region can actively participate in meeting California EE goals and equitably benefit from ratepayer-funded EE programs.

B. Application Intent

The intent of I-REN's 2028-2035 business plan application (BPA) is to sustain and grow its foundational portfolio of programs focused on increasing energy bill affordability for public sector customers and educating public and private sector building professionals to realize bill savings for all customers in the region through high-quality, code-compliant EE work. In tandem, I-REN aims to empower local public

sector leaders and workforce to foster greater awareness of EE benefits and opportunities for all ratepayers in the IE.

I-REN's data-driven approach to its 2028-2035 portfolio intentionally avoids administrative burden and program overlap risks associated with launching brand new efforts into new market sectors. Instead, I-REN proposes to continue refining and improving services offered in its current programs, in alignment with its overall mission and vision. With I-REN as the local connection point for equitable EE, key outcomes of this BPA are that inland communities participate in the clean energy economy and receive EE benefits, while contributing benefits to the overall energy system and all ratepayers and Californians.

A year-long stakeholder process of direct engagement, education, and iteration of approaches and strategies informed the intent for this BPA. Based on this stakeholder input, I-REN's application has been thoughtfully developed to balance significant concerns about affordability statewide, with the equally pressing local affordability, EE, and resiliency needs that inland communities have entrusted I-REN to address in this BPA.

As a REN PA, I-REN is guided by a commitment to inland communities and the accountability of ongoing engagement as representatives of local government. In early 2025, I-REN requested input from its Executive Committee, a governing board made up of elected officials from across the I-REN service territory, to inform the portfolio framework for this application.

Key themes of this input are as follows: 1) services currently provided by I-REN are greatly needed and will require additional time and support to overcome continued, longstanding gaps in EE awareness and workforce capacity; and 2) the Inland region also lacks awareness of and access to opportunities for EE and resiliency for market sectors not currently served by I-REN, e.g., residential, commercial, and industrial. The Executive Committee requested that I-REN consider whether its portfolio should be expanded to address these needs.

A significant overarching concern for I-REN in addressing stakeholder requests has been affordability and judicious use of ratepayer dollars. That framing informed a careful approach to gather additional data for portfolio development.

- In response to key theme #1, I-REN launched evaluation studies and additional stakeholder engagement as extensively detailed in Chapter 8.
- In response to key theme #2, I-REN examined current programs offered by other PAs in the Inland region to assess potential gaps. This initial assessment identified programs potentially available to other market sectors. However, on reviewing this assessment, I-REN stakeholders indicated that these programs are unfamiliar to and/or underutilized by I-REN communities.

Guided by this engagement and research, I-REN proposed and received stakeholder support for the following intentions for this 2028-2035 application:

- Optimize I-REN's foundational portfolio of programs based on lessons learned, to meet stakeholders' communicated needs for increased services, and continue strengthening the regional framework being established now over the next eight-year horizon.
- Empower local leaders and organizations through education and outreach to foster greater awareness of EE benefits and opportunities across all sectors in the Inland Empire region.

I-REN's collaborative approach balances affordability concerns and local needs by relying on existing programs from I-REN and other PAs to ensure ratepayers fully benefit from their investments in these offerings. In parallel, ratepayers across California will receive energy system benefits and growth in the state's clean energy economy, as a result of increasing equitable EE for I-REN communities.

C. Regulatory Context

Over the past two decades, the California Public Utilities Commission (CPUC or Commission) has worked with stakeholders to enable local government participation in EE program delivery. With the creation of the REN PA model, the Commission uplifted and codified the unique and appropriate role for local governments in supporting ambitious statewide goals for increasing EE, reducing greenhouse gas (GHG) emissions, and preparing climate adaptation strategies as set forth in legislation and related strategic plans.[1]

As dedicated representatives of local government with experience delivering clean energy programs in the IE, in 2021 the I-REN COGs applied for REN PA status to offer a portfolio serving the Public Sector, Codes & Standards (C&S), and Workforce Education & Training (WE&T).[2] I-REN was approved for a unique, six-year portfolio period of 2022-2027, and the Commission noted that I-REN's business plan complies with the requirements for REN portfolios.[3] Moreover, the Commission affirmed that I-REN's "focus on equity and serving disadvantaged and underserved communities is welcome and consistent with the Commission's [Environmental and Social Justice] ESJ Action Plan."[4]

The regulatory context for I-REN's current portfolio has been characterized by significant change, directly informing the development of this BPA submittal. Just months following I-REN's business plan filing in February 2021, the Commission released a pivotal decision—D.21-05-031—that reimagined the rolling portfolio framework, ordered four- and eight-year BPA filings such as this, and uplifted crucial

[1] See, for example, Senate Bill (SB) 100, SB 350, Assembly Bill (AB) 1482, SB 246, SB 379, AB 2800, AB 802, AB 39; California Long Term Energy Efficiency Strategic Plan and related action plans.
[2] Motion of the Western Riverside Council of Governments on Behalf of the Inland Regional Energy Network (I-REN), for Approval of its Energy Efficiency Rolling Portfolio Business Plan and Budget, February 26, 2021.
[3] D.21-11-013 Conclusion of Law (COL) 4.
[4] D.21-11-013 COL 7.

needs for equity and market support (E&MS) within the statewide EE portfolio. I-REN anticipated and proposed to serve these important needs in its first business plan and after approval, moved quickly to adapt its portfolio to the new paradigm.[5]

After the other PAs refiled their business plans in 2022 the Commission issued another pivotal decision, D.23-06-055, setting in motion numerous joint PA and stakeholder initiatives. Many of those orders focus on developing methodologies to measure progress toward equity and market support objectives, quantify non-energy benefits and encourage community involvement in EE programs. The Commission specifically called out these new efforts as crucial for evaluating REN performance—affirming that REN portfolios are not subject to a cost-effectiveness threshold because their portfolios are limited to specific criteria as described in D.19-12-021 and tend to focus strongly on equity and market support.[6]

The work to develop these methods is ongoing through efforts such as the Market Rate Non-Energy Benefits (MR NEBs) study; the Awareness, Knowledge, Attitudes, and Behavior (AKAB) studies; the E&MS goal constructs; and the development of data tracking and reporting tools for E&MS indicators—all of which will contribute to the launch of these accountability mechanisms in 2028 and beyond.

I-REN has actively participated in these initiatives and has continued to refine its current portfolio, proposed here to continue in 2028-2035, to deliver outcomes aligned with these emerging accountability mechanisms. I-REN's proposed portfolio is specifically designed to drive progress toward E&MS objectives and the ESJ Action Plan, and to be accountable as a REN within the regulatory context of these important new measurement frameworks.

[5] I-REN Advice Letter No. 2-E-G: 2022 Metrics and Portfolio Segmentation of I-REN, Pursuant to Decision (D.) 18-05-041, D.21-11-013, and D.21-05-031

[6] See, for example, D.12-11-015 COL 14; D.19-12-021 at 37-38; D.21-05-031 COL 8 and 9.

II. Chapter 2: Portfolio Summary

A. I-REN Mission, Vision, and Governance

I-REN's mission and vision are centered on addressing the challenges the IE faces with affordability and equitable access to EE benefits—not only the benefits that EE can bring to individual ratepayers, but also the benefits of the clean energy economy for creating opportunities to train and retain skilled workers in family- and community-sustaining careers.

Figure 1: I-REN Mission and Vision

The I-REN organization builds on the robust and active Committee structure currently used for the three Council of Governments (COGs) (also referred to herein as the I-REN governing agencies) to ensure accountability to public sector stakeholders and the communities they serve.

The COGs each have an Executive Committee that sets policy and oversees the budgets for the COGs. For I-REN, they provide an oversight role to ensure accountability and service to the member cities. Representatives from the cities, the County Board of Supervisors, and the Municipal Water Districts collectively have seats on the Executive Committees for WRCOG, CVAG, and SBCOG. By working together through the committee structure and utilizing resources, the COGs are

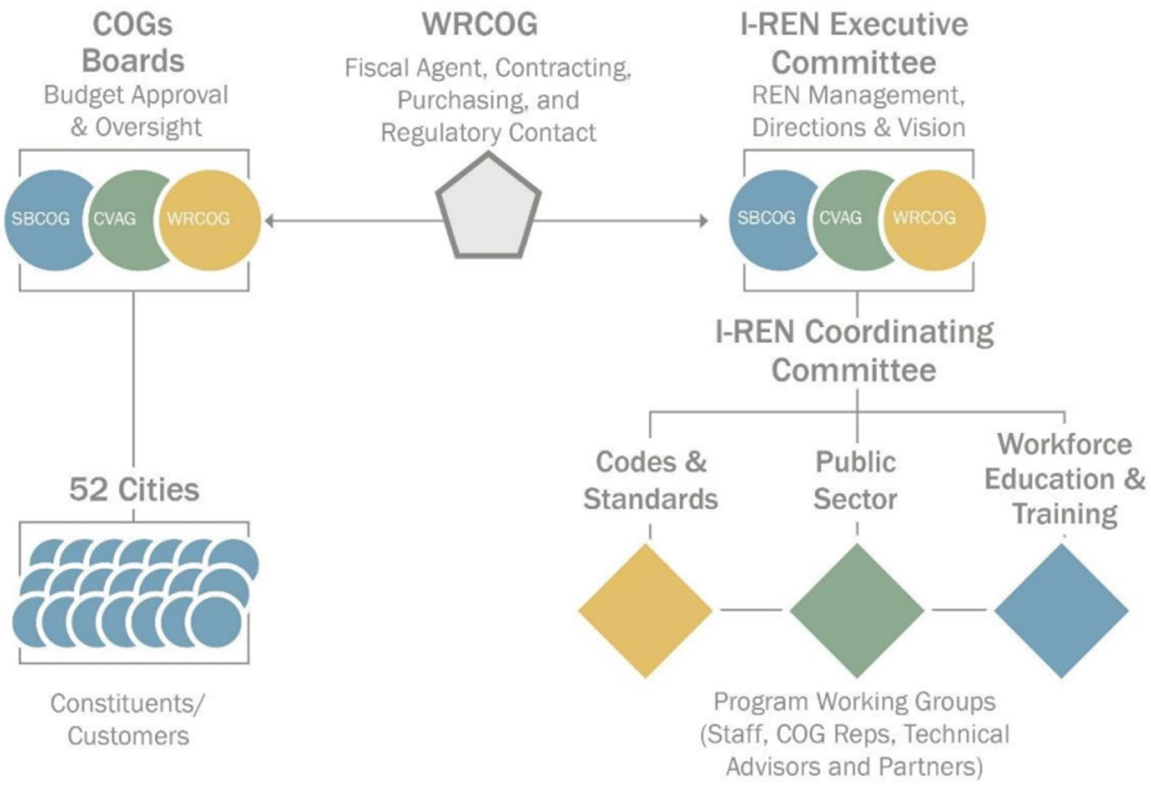
cost-effective by reducing duplication of effort and sharing information, enabling strong advocacy and strengthening the IE region's standing.

WRCOG serves as the fiscal agent, purchasing and contracting entity, and primary regulatory contact manager for I-REN. WRCOG does not have more decision-making power than the other COGs but works through the committee structure to ensure equal engagement for the entire region and equitable services supporting the most vulnerable communities in the IE.

Representatives from each COG are in turn represented on the I-REN Executive Committee and have equal power in I-REN decision making and management. The I-REN Executive Committee sets all strategic direction, vision, and specific policies related to the operation and management of REN activities, and jointly considers regulatory issues. This structure provides a feedback loop and accountability mechanism that is a crucial part of I-REN's work supporting ESJ Action Plan Goal 5: Enhance Outreach and Public Participation Opportunities for ESJ Communities to Meaningfully Participate in the CPUC's Decision-Making Process and Benefit from CPUC Programs.

The I-REN Executive Committee is advised by three programmatic working groups composed of I-REN staff, COG representatives, technical advisors, and partners. The Program Working Groups focus on program design, implementation, marketing and outreach, and other day-to-day implementation activities. They provide information, program proposals, and program tracking and monitoring reports to the I-REN Executive Committee on a regular basis to ensure smooth operations and to address any issues or concerns that may arise.

Figure 2: I-REN Governance



B. Service territory and service territory-related factors

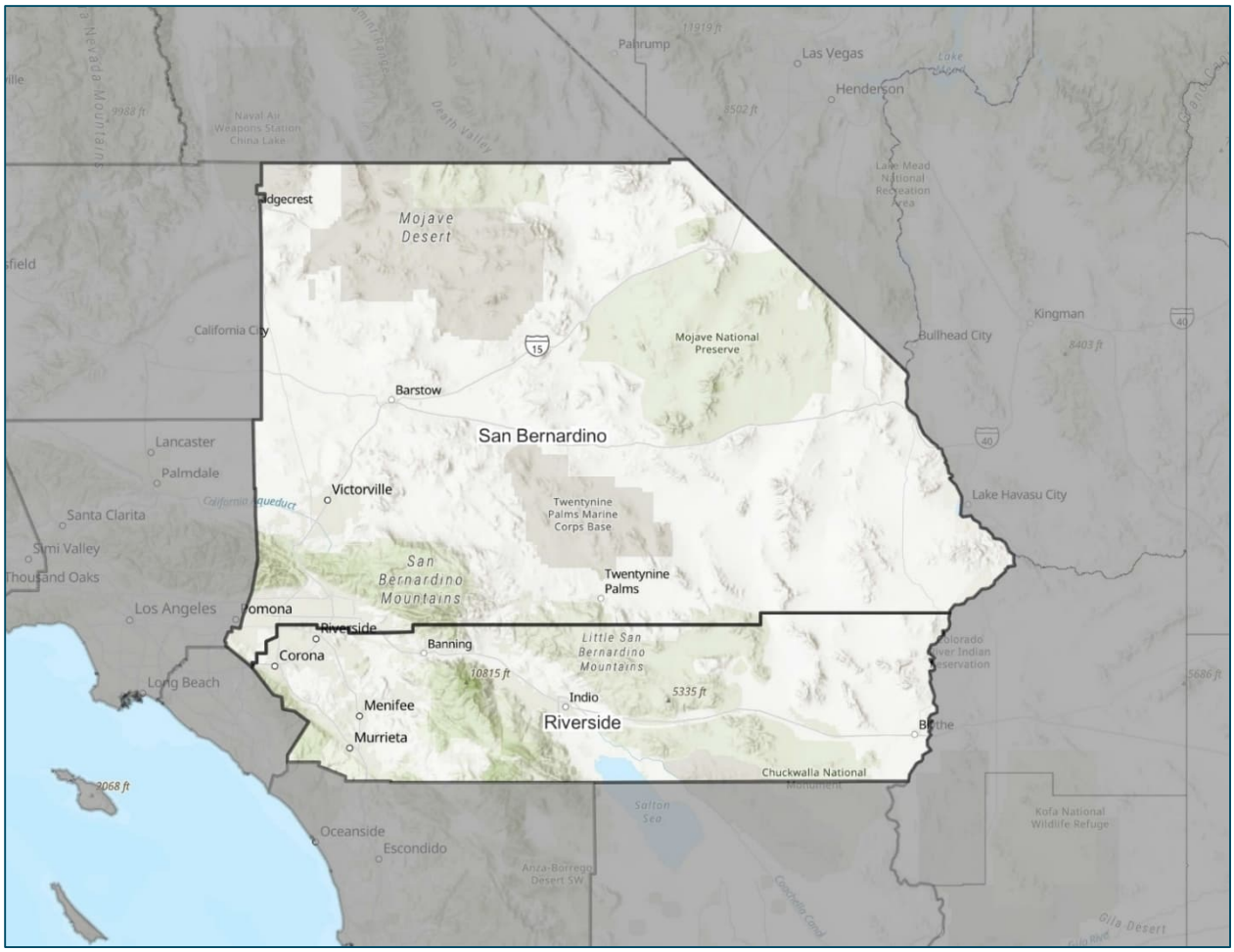
I-REN's Region & Geographic Backdrop

The I-REN jurisdiction, as shown in the map below,[7] includes all areas within San Bernadino County and Riverside County encompassing 52 cities, 78 unincorporated county areas, and 17 tribes. These counties together make up the Riverside-San Bernardino-Ontario Metropolitan Statistical Area (MSA), colloquially referred to as the "Inland Empire" or IE. This region makes up 12% of California's population and 17% of California's land area, with San Bernardino County being the largest county by land area in California. The IE is also one of the largest MSAs in the state, second only to the Los Angeles-Long Beach-Anaheim MSA.

The I-REN region has a diverse geography with mountains, deserts, distinct urban areas, tribal areas, and vibrant communities and towns. Though the region does have large, densely populated areas in major cities, including the cities of San Bernardino and Riverside, it also has rural desert and mountain communities that are sparsely populated. Special districts play a significant role in the region, operating services including water, sanitation and wastewater, parks and recreation, resource and conservation, and other community services.

[7] Source: CA Governor's Office of Emergency Service May 2025 https://services.arcgis.com/BLN4oKB0N1YSgvY8/arcgis/rest/services/Counties_in_California/FeatureServer/0

Figure 3: I-REN Geographic Territory



The geography of the I-REN region is one of the key service territory-related factors that have historically led to insufficient energy efficiency services to the region and continue to make EE goals difficult to achieve. I-REN's EE portfolio for 2028-2035 proposes to continue delivering local solutions to these challenges.

- Widely varying topography and population density: The IE includes larger swaths of rural land with less connected communities, making it difficult to reach, especially by larger utilities, as well as by residents and workers traveling within the region. Physical barriers such as mountain ranges and deserts provide additional challenges in delivering services to the region.

- Extreme weather and deadly heat: The Inland Empire or "IE" experiences a variety of extreme weather, from record-breaking snowfall that strands people in their homes to deadly extreme heat—the hottest temperatures in the state. Extreme temperatures endanger vulnerable populations and lead to higher stress on the energy grid and in particular, higher summer energy costs, highlighting the need for climate resilient solutions.
- Fast Growth and Increasing Energy Usage: The region is growing quickly due to land availability, and there is concern that the grid capacity will not keep pace with this growth. : The rural areas of I-REN's territory are attractive for data centers and large warehouses, which would cause excessive strain on the energy grid.

Gaps in I-REN Jurisdictions

Below are issues facing local jurisdictions affecting uptake of EE programs.

Staffing and Resource Constraints: One of the primary reasons I-REN pursued REN PA status in its first business plan is the need for increased energy efficiency in the public sector. However, local governments in the IE continue to face barriers related to limited staff time for energy-related projects. This has been reaffirmed as a continuing challenge very recently, in I-REN's EM&V studies and BPA stakeholder engagement, detailed in Chapter 8. As a result of this feedback, I-REN proposes to increase its current cross-cutting support for local governments, through wraparound technical assistance and financing for energy projects, education and technical support for C&S compliance, and workforce solutions that directly employ dedicated staff to support public sector EE projects.

Lack of Knowledge and Awareness: I-REN's research to inform this BPA shows that lack of awareness of EE benefits and programs is a continuing challenge—for public sector agencies themselves and for the residents and businesses in the communities they serve. One of the key strategies for this BPA is leveraging I-REN's

trusted relationships with its local government and workforce audiences to increase awareness of and participation in EE programs in the region, with outreach and innovative educational solutions to identify and refer customers to EE incentives and resources.

Lack of Trained Workforce: The dearth of contractors trained for energy efficiency work in the Inland Empire is a significant challenge. While this makes finding a trained contractor difficult, the lack of contractors also presents a large opportunity to grow the workforce in the region through the WE&T sector programs. I-REN plans to dedicate significant budget increases for these programs as part of this BPA, to grow the Fellowship program and to increase relevant energy efficiency trainings for contractors in the region.

Lack of Seed Funding: The lack of seed funding to kick-start projects for public agencies makes larger upgrades more difficult for I-REN's public sector customers. While Fellows can help connect public agencies to existing funding opportunities, the uncertainty around federal funding cuts may require agencies to seek additional sources of funding. I-REN will continue to explore opportunities for innovative funding options, such as assessing the opportunity to use philanthropic funds for these projects. These opportunities are provided through the Roadmap Analyses I-REN performs for their agencies.

Lack of Data: A top issue identified in the current program cycle is the challenge of getting reliable data and building information from utilities to implement the Normalized Metering Energy Consumption (NMEC) program. The time to gather, refine, and ensure data accuracy is often a substantial barrier for municipal governments. I-REN has been working to fill this gap through its Fellows program, increasing awareness of available technical assistance and the benefits of the program for participants. I-REN will continue to provide focused support to local communities, while also supporting upgrade-ready jurisdictions that have greater

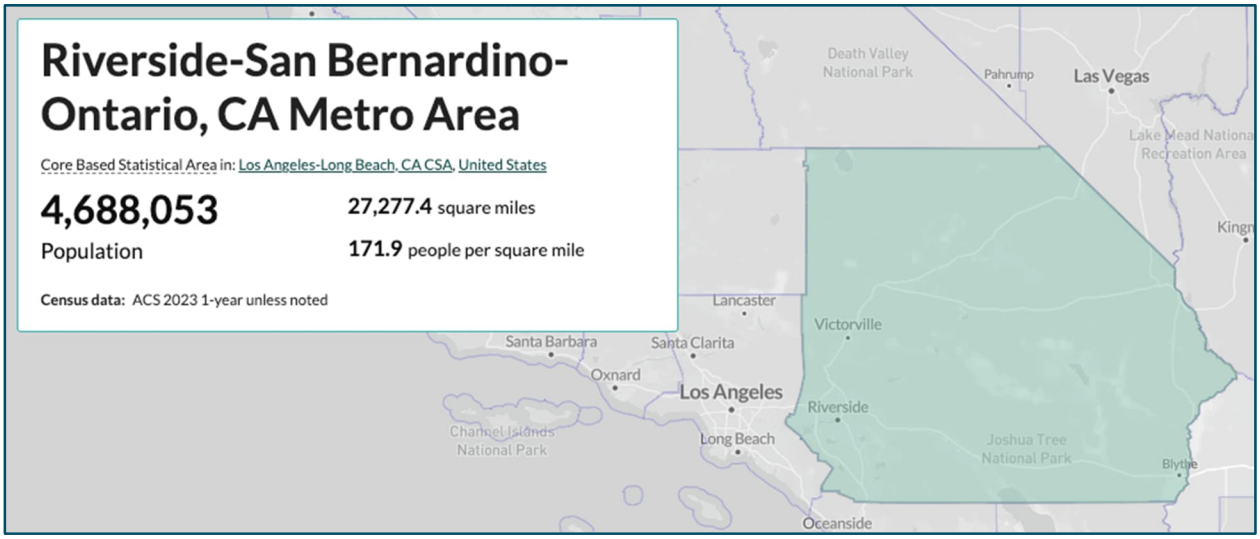
capabilities to participate in the short term and that address the unique needs of the Inland Empire.

Demographic Characteristics

The San Bernardino-Riverside-Ontario MSA, which comprises the Inland Empire, is home to 4,688,053 people. The following charts provide demographic data for the Inland Empire.

- Riverside County: Population 2,492,442 (2023 Census), covering 7,209 square miles, population density of 345.7 people per square mile
- San Bernardino County: Population 2,195,611 (2023 Census), covering 20,068 square miles, population density of 109.4 people per square mile

Figure 4: Riverside-San Bernardino-Ontario MSA Key Demographics



The Inland Empire, along with the Central Valley, saw the most growth of all of California from 2021 to 2024[8] and is expected to continue growing, particularly over the next 10 years, as shown in the table below.[9] As the region grows, I-REN will play an increasingly important role in reducing energy use and achieving energy

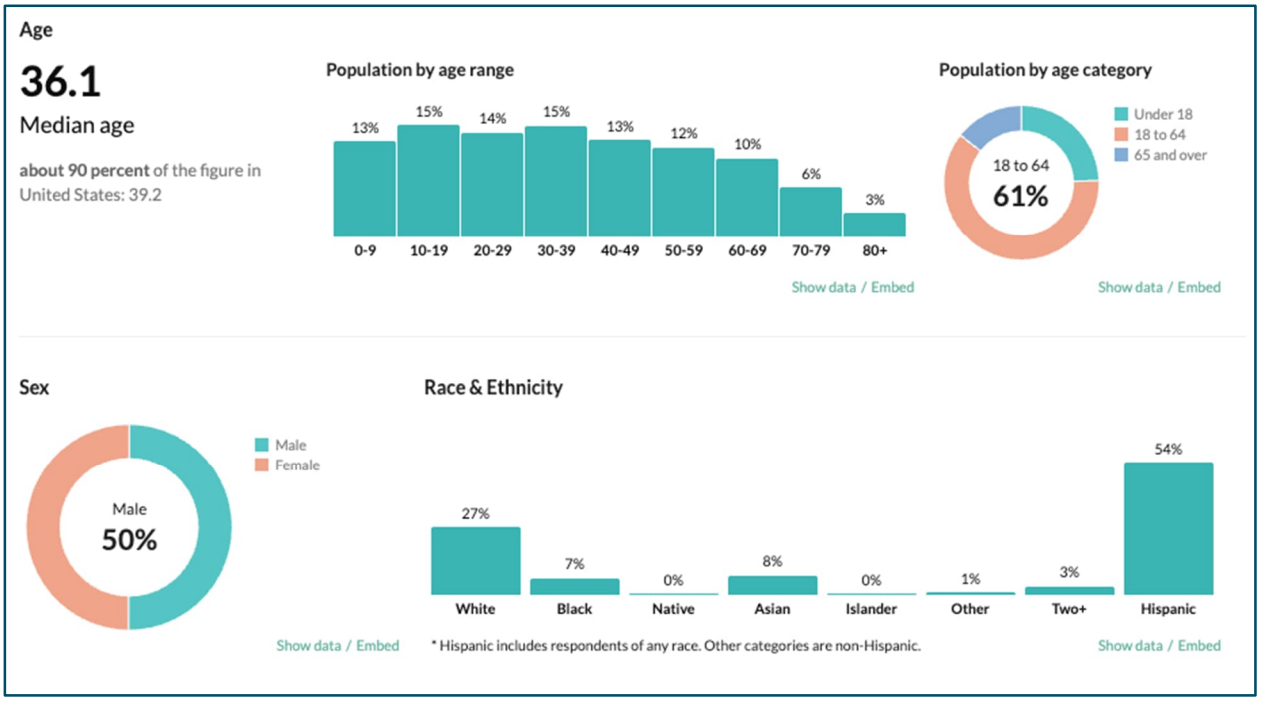
[8] https://www.gov.ca.gov/2025/05/01/californias-population-increases-again/
[9] California Department of Finance table P2A County Total 2025 https://dof.ca.gov/forecasting/demographics/projections/

savings and promoting long-term economic and environmental sustainability through its programs.

Table 1: Projected Population Growth

	2025	2035	2050	Projected Population Change % (2025-2050)
California	39,299,708	40,105,580	40,819,078	3.86
Riverside County	2,462,781	2,558,733	2,707,319	9.93
San Bernardino County	2,190,800	2,219,560	2,169,674	-0.96

Figure 5: Riverside-San Bernardino-Ontario Population Demographics



With a median age of 36, the region is slightly younger than the California median of 38.2 and has a fairly even distribution of age groups.[10] Sixty-one percent of the population fall between 18 to 64 which suggest a strong workforce or working-age community. Over half of the population identifies as Hispanic, followed by 27% identifying as white indicating a need to ensure all programs are accessible in Spanish and are culturally appropriate.

1. Income

Unfortunately, the IE continues to face severe economic challenges, highlighted in the recently-released 2025 Southern California Economic Update: Riverside and San Bernardino Counties Report from the Southern California Association of Governments (SCAG). The report notes,

[10] Census Reporter ACS 2023 Survey, https://censusreporter.org/profiles/31000US40140-riverside-san-bernardino-ontario-ca-metro-area/

> The Economic Outlook for the Inland Empire over the next 12 to 18 months is bleak. The unemployment rate is expected to increase significantly, and by more than the state and national unemployment rate. The growth in unemployment is expected due to limited growth in logistics, health care, and government, all of which are at risk given the current direction of the U.S. economy and policies. Moreover, the near-term outlook for key sectors, such as leisure and hospitality/tourism, manufacturing, and construction, is one of continued job losses.[11]

One of the key factors cited in the SCAG report is the lack of diversification in the region's employers, where a handful of industries dominate job creation. Despite the significant growth of logistics and data and associated job opportunities, many of those jobs offer lower than average wages. Income inequality in the IE likely grew during the pandemic due to the expansion of these lower-paying jobs.[12]

The Riverside-San Bernardino-Ontario MSA has a median household income of $87,843,[13] which is significantly lower than the California median household income of $95,531.[14] Roughly 12% of the Inland Empire falls under the federal poverty line and the region faces persistent and racialized wage inequality, worsened in recent years since the pandemic.[15]

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[11] SCAG 2025 Southern California Economic Update Riverside and San Bernardino Counties Report

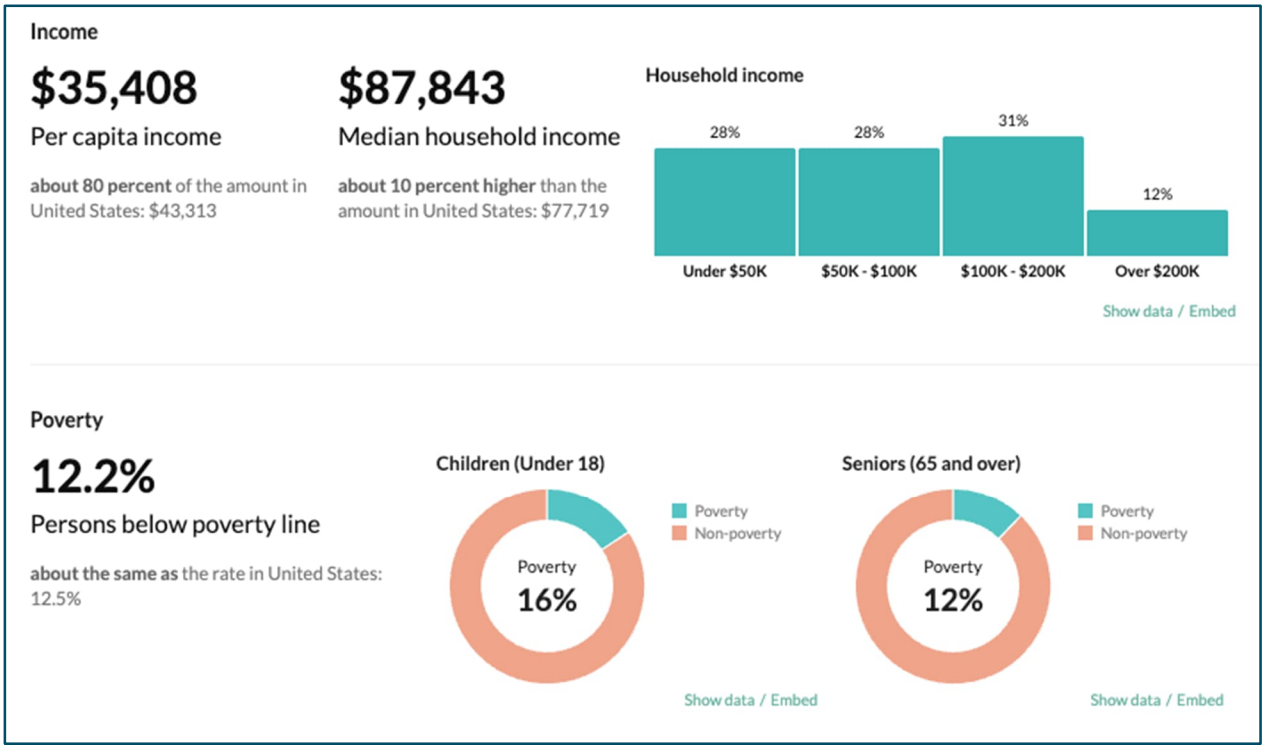
[12] University of California Riverside (UC Riverside) Inland Empire Labor and Community Center (IELCC), State Of Workers In The Inland Empire 2025, June 2025, at 5.

[13] https://censusreporter.org/profiles/31000US40140-riverside-san-bernardino-ontario-ca-metro-area/

[14] https://censusreporter.org/profiles/04000US06-california/

[15] UC Riverside IELCC report at 21.

Figure 6: Riverside-San Bernardino-Ontario MSA Income & Poverty

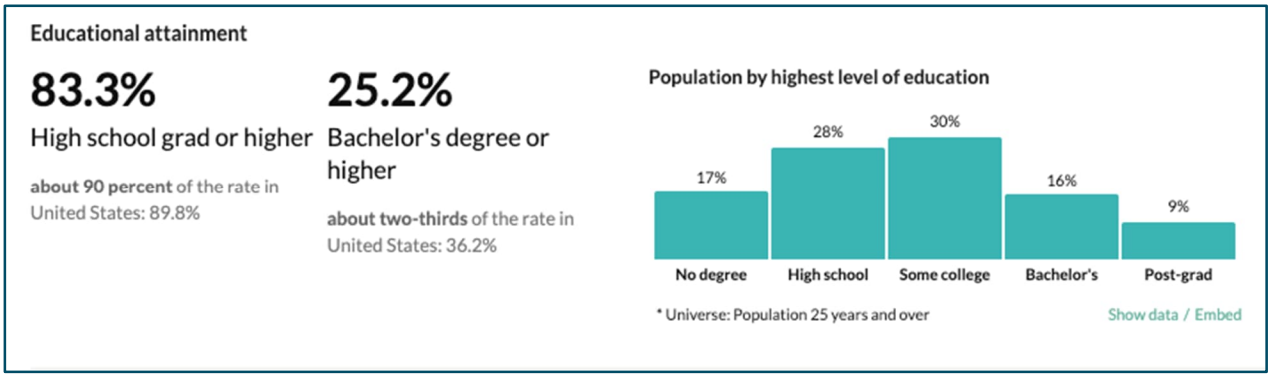


2. Education Level

The Inland Empire has significantly fewer Bachelors (or higher) degree holders than the California average of 37.5%.[16] The University of California Riverside (UC Riverside) Inland Empire Labor and Community Center (IELCC), State Of Workers In The Inland Empire 2025 report urges that policymakers encourage workforce development in the region, with a focus on increasing access to vocational training, particularly in industries that provide stable, well-paying work without requiring advanced degrees.[17] I-REN's recent Energy Workforce Gaps Assessment findings agree--additional opportunities for energy efficiency and electrification trainings and certifications would benefit this region's population by providing stronger career prospects for workers that may have only a high school diploma.[18]

[16] https://censusreporter.org/profiles/04000US06-california/
[17] Ibid, at 7 and 35.
[18] I-REN 2024 Energy Workforce Gaps Assessment at 23. Available online at https://iren.gov/DocumentCenter/View/277/I-REN-Energy-Workforce-Assessment-Report

Figure 7: Riverside-San Bernardino-Ontario MSA Education Level MSA



3. Language

A significant percentage of workers in the IE face language barriers, in particular, Latino workers, with limited English proficiency impacting 20-27% of Latino workforce as shown in Figure 8. Employment opportunities in the IE are dominated by a few key industries including construction. Latino workers are overrepresented among construction workers in the IE, and the construction industry continues to grow as the region's population rapidly increases. However, Latino workers face persistent wage disparities, housing inequities, and other barriers.[19]

Latino workers are vital to the construction industry in the IE and therefore crucial for realizing the benefits of EE in this underserved region—at the micro level of high quality EE equipment installations for individual customers, and at the macro level of creating a family- and community-sustaining workforce ecosystem in this growing region that can help meet statewide energy and climate goals. Addressing language barriers in EE training for building professionals is an important equity strategy already in use by I-REN and proposed to continue in this BPA, with cross-cutting sector and segment importance for supporting workforce development to bolster the supply side of EE markets. I-REN plans to innovate its outreach strategies to increase awareness and uptake of its Spanish-language

[19] Latino Workers in the Inland Empire | Latino Policy & Politics Institute

educational offerings, while refining its forthcoming online learning management system to track progress towards greater awareness and usage of those resources.

Figure 8: Limited English Proficiency among the Inland Empire and California Workers by Race, Ethnicity, and Sex, 2022

Source: Latino Workers in the Inland Empire | Latino Policy & Politics Institute

4. Equity Communities

In D.23-06-055 the Commission notes the "considerable, deliberate effort and engagement" needed to understand and address equity communities. The IE is home to communities facing barriers to accessing energy efficiency across multiple dimensions as described throughout this BPA: geographic barriers, extreme heat, air pollution, income, education level and workforce opportunities, etc. Some of these communities are recognized within the CPUC equity target community definitions, and some are not.

As described throughout this BPA, I-REN proposes a data-driven approach to targeting and serving equity communities. The below describes IE demographics using the framework of CPUC equity target community definitions, as well as a recent EM&V study conducted by I-REN to assess IE communities' equity challenges and assign composite scores to guide I-REN EE activity targeting.

- Hard-to-Reach Customers: The I-REN region is home to many customers who do not have easy access to program information, and/or who generally do not participate in EE programs due to a variety of barriers and challenges. Income and language are known challenges in this region, as described in the previous sections.

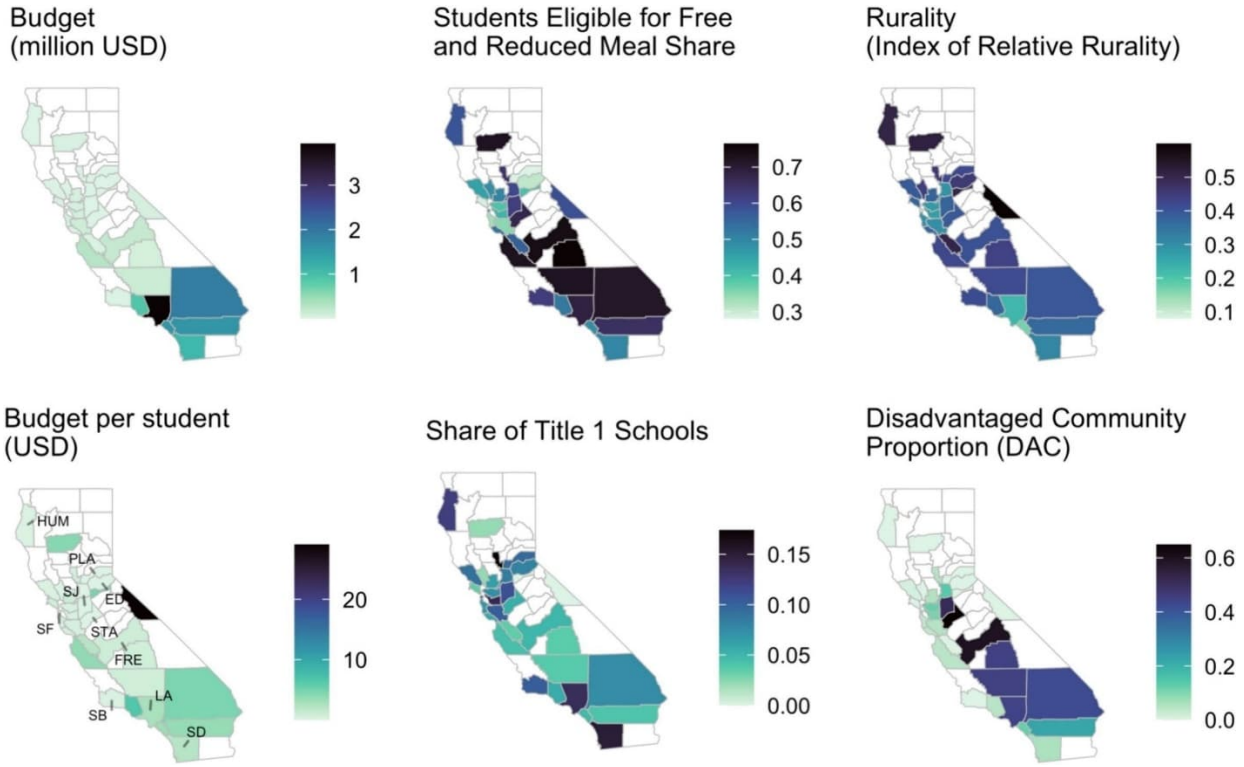
  The geography of the IE is also a significant barrier that has long prevented ratepayers in this region from realizing the benefits of EE. The farther a community is located from the urban centers at the western edge of the IE, the more difficult it is to physically reach these ratepayers and less cost-effective (according to a Total Resource Cost or "TRC"-based cost-benefit framework) it is to serve them.

  However, for CPUC EE program purposes, the entirety of both Riverside and San Bernardino counties all the way to their borders with Arizona and Nevada are considered part of the Greater Los Angeles Area. In order to meet the geographic criteria for CPUC's HTR definition, I-REN ratepayers must be located in a DAC. In the most recent update to the HTR definition, CPUC established that for the public sector, local government customers must meet the geographic criterion to be considered HTR, without additional pathways to qualify.

  I-REN public sector ratepayers serve many HTR residential and small business customers, whether the local government entity itself meets the geographic HTR criteria, and the public sector agencies themselves face significant barriers in accessing EE due to their distance from metro areas, limited staff capacity, and lack of awareness of EE. A recent UC Santa Barbara study shows that the largest predictor of total and per capita energy efficiency funding for local governments is rurality, with spending on energy efficiency

programs in these counties being lower than average.[20] Considering the economic hardship and need for investment in the Inland Empire, I-REN is proposing a re-evaluation of the geographic criterion for HTR, so that public sector ratepayers in the I-REN region, many of which are located far from urban centers, are recognized appropriately as geographically hard to reach.

Figure 9: I-REN Public Sector EE Inequities



Source: [Inequity in public sector energy efficiency? Explaining disparities in program budgets in California, United States - ScienceDirect]

- Disadvantaged Communities: As defined by SB 535, Disadvantaged Communities (DACs) refer to tribal lands or areas with a population with a

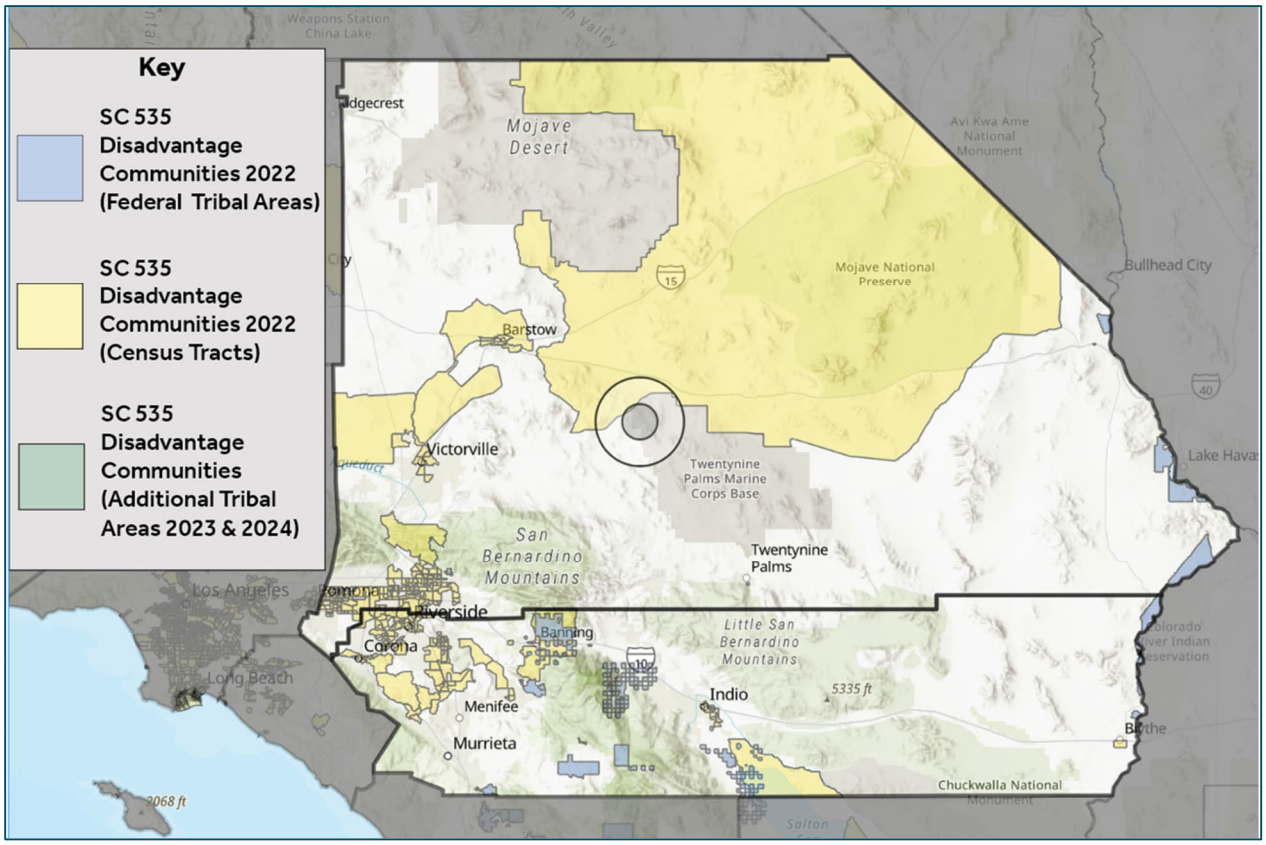
[20] Michelle Le, Sydney Litvin, Atherv Gole, Audrey Meiman, Austin Covey, Nathaniel Villa, Measrainsey Meng, Tatum Katz, Ranjit Deshmukh, Inequity in public sector energy efficiency? Explaining disparities in program budgets in California, United States, Energy Research & Social Science, Volume 114, 2024, 103590, ISSN 2214-6296, https://doi.org/10.1016/j.erss.2024.103590.

median income 60% below the statewide median. The I-REN territory has large sections of the region that are DACs; as seen in Error! Reference source not found. there are large portions of land designated as DACs in San Bernadino County, as well as many smaller DACs closer to the cities of San Bernadino and Riverside. The map in Error! Reference source not found. shows many census tracts that are in the 60th percentile or higher for pollution burden and social vulnerability, aligning closely with the DAC regions.

- I-REN Disadvantaged Jurisdictions: as described further in Chapter 8, I-REN conducted EM&V studies in 2025 to gather primary and secondary research to inform this BPA and support continuous program improvement within its current portfolio cycle. To support I-REN's overarching goal of expanding equity in the IE region and overcoming barriers preventing EE project uptake, I-REN conducted a study to analyze its public sector jurisdictions meeting equity criteria.[21] As part of this study, a new Disadvantaged Jurisdiction Scale was developed to represent equity eligibility with greater nuance than a simple binary measure. Aligned with CPUC equity criteria, the scale classifies jurisdictions into four categories—High, Moderate, Low, and None—by aggregating multiple indicators: HTR status, income thresholds, population-weighted DAC exposure, and FRPM eligibility. Jurisdictions with higher scores exhibit a greater concentration of equity-related characteristics. A jurisdiction-level dataset was created by merging (1) HTR geography, (2) American Community Survey (ACS) 2023 5-year median household income, (3) CalEnviroScreen 4.0 tract-level scores population-weighted to jurisdiction boundaries, and (4) California Department of Education FRPM data. By comparing this data with program participation data I-REN can adjust outreach effort to ensure that jurisdictions with the greatest equity needs receive the support they need.

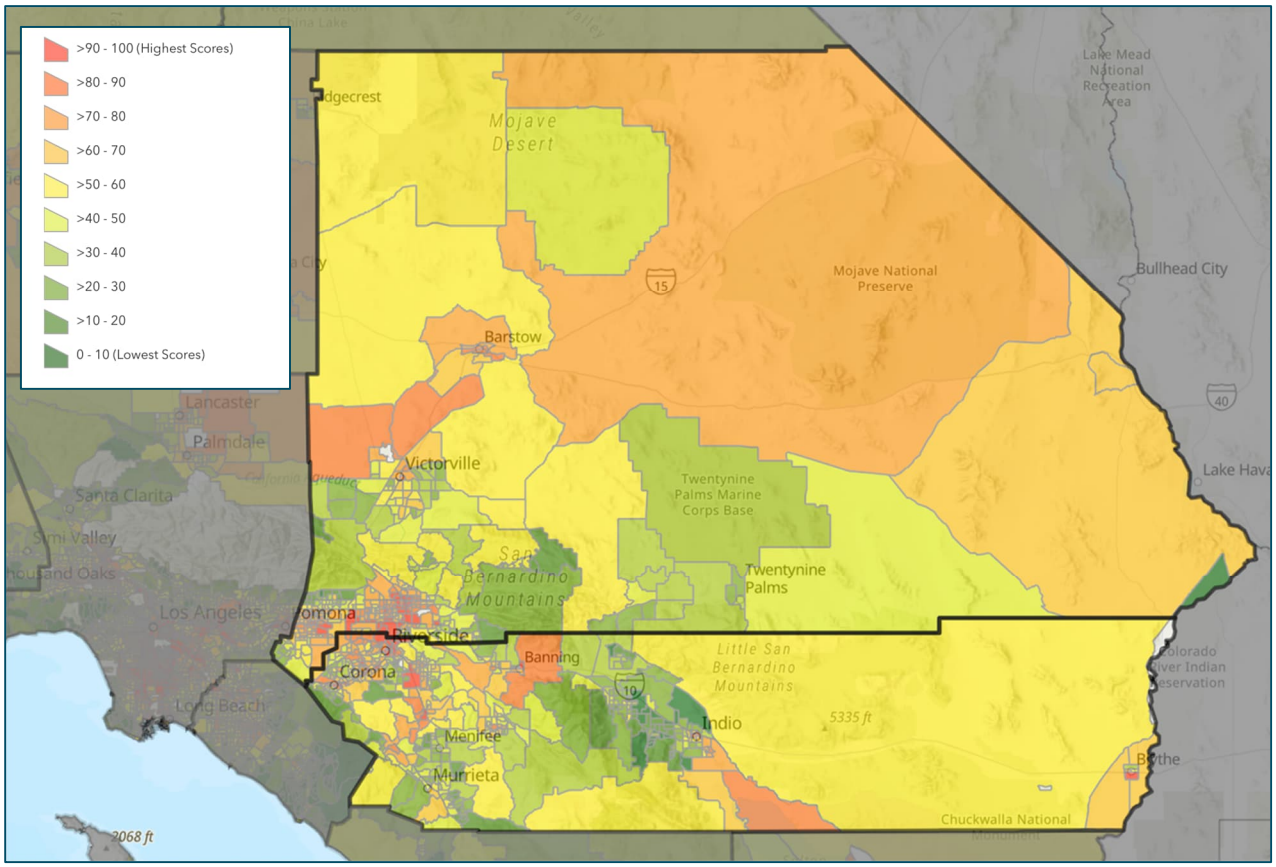
[21] I-REN 2025 EM&V Study 2: I-REN Equity Jurisdictions

Figure 10: Disadvantaged Communities and Tribal Lands



Source: SB 535 Disadvantaged Communities 2022 (tribal update 2024)- CalEnviroSceen

Figure 11: CalEnviroScreen 4.0 for I-REN Territory

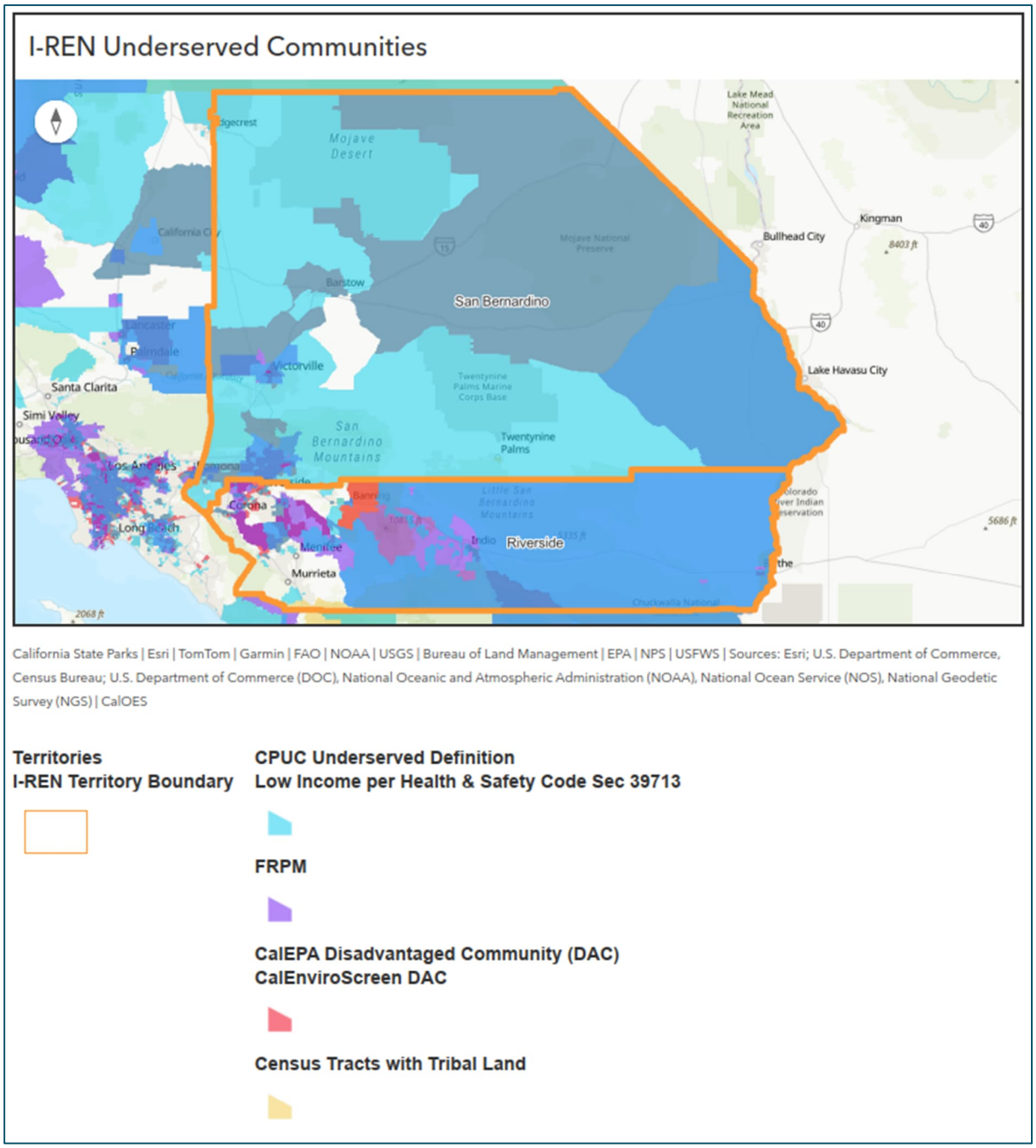


Source: CalEnviroScreen 4.0

- Underserved Communities: I-REN has developed and continues to refine its own equity mapping tool to be inclusive of best available data for classifying underserved communities according to the D.23-06-055 criteria.[22] See Error! Reference source not found. below for an overview of I-REN underserved communities, including large areas of low income ratepayers and communities in which at least 75 percent of public school students in the project area are eligible to receive free or reduced-price meals under the National School Lunch Program.

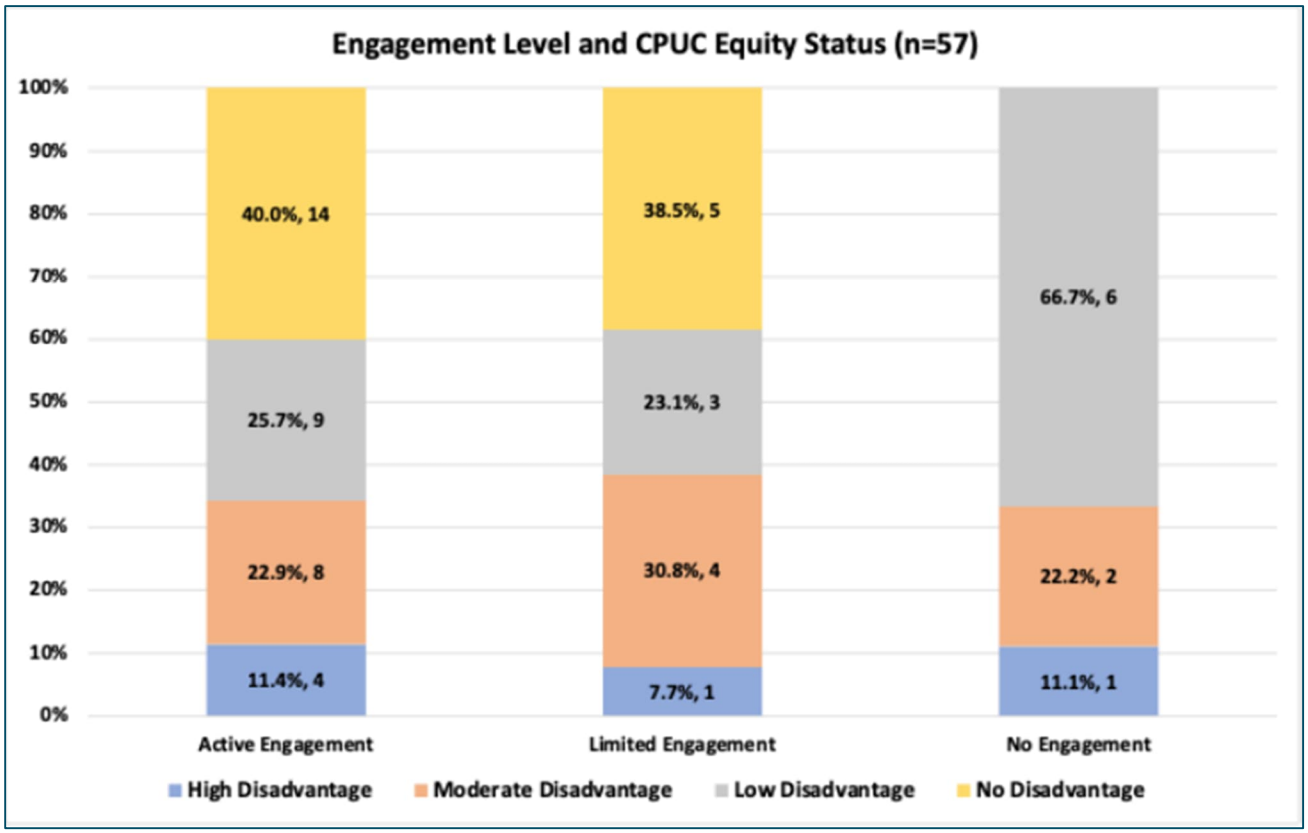
[22] D.23-06-055 COLs 31-32.

Figure 12: I-REN Underserved Communities Map



Source: [Regional Equity Maps | Inland Regional Energy Network, CA]

Figure 13: I-REN EM&V Study Findings: Low Engagement Equity Jurisdictions



This figure depicts the results of I-REN's EM&V study described earlier in this section. This study evaluated composite data merging (1) HTR geography, (2) ACS 2023 5-year median household income, (3) CalEnviroScreen 4.0 tract-level scores population-weighted to jurisdiction boundaries, and (4) California Department of Education FRPM data. This data was compared to program participation data to assess which jurisdictions require additional outreach. Figure 13 and the findings of the study represent an important opportunity for I-REN to conduct additional outreach to equity jurisdictions in order to increase engagement with I-REN's programs.

Climate Impacts

Climate change impacts, especially extreme heat, are anticipated to significantly impact Riverside and San Bernardino counties. This will result in an anticipated increase to roughly 60 extreme heat days annually (days over 106°F) and 60 warm nights (nights above 76°F) by 2100,[23] as Error! Reference source not found. and Error! Reference source not found., respectively. A CalMatters analysis from September 2024 identified 11 cities in California that are experiencing rapid population growth and are most endangered by rising extreme heat from climate change, and 5 of those 11 cities are in I-REN territory.[24]

The region already experiences extreme heat at levels that are dangerous to humans and costly to individual ratepayers and local governments who are the frontline responders in these events. A 2024 study on the impacts of extreme heat to California's people, infrastructure, and economy examined extreme heat events between 2013 and 2022, and six of the seven deadly extreme heat events touched the IE, as shown in Error! Reference source not found..[25]

All buildings will need to use more energy to maintain indoor comfort in coming years, resulting in an overall increase in energy consumption if no further interventions are taken. This is especially true for local government buildings that serve as critical facilities with 24-hour operations in times of emergencies. EE and resiliency measures in public facilities are crucial for strengthening community-serving infrastructure and protecting human health.

In addition to extreme heat, the IE region also experiences high winds and wildfire risks that lead to power outages and Public Safety Power Shutoff (PSPS) events.

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[23] https://cmip5.cal-adapt.org/tools/local-climate-change-snapshot

[24] These California Cities Will Face the Most Extreme Heat Danger as Climate Changes | KQED

[25] Industrial Economics, Incorporated, for California Department of Insurance. *Impacts of extreme heat to California's people, infrastructure, and economy: Pioneering analysis measuring the uninsured and insured costs of extreme heat events*, June 28, 2024.

These events are frequent and can be lengthy. In January 2025, tens of thousands of customers in the IE were without power (some for nearly two weeks) due to PSPS events related to the wildfires in Los Angeles County. These reliability events lead to families losing hundreds of dollars' worth of perishable food, they impair business operations—especially for small businesses, and they create health and safety risks—especially in times of extreme heat. There are costs associated with each of these impacts and benefits to avoiding them.

These events will only become more likely due to extreme heat events from climate change, and underscore the need for local governments to support energy efficiency, reducing the likelihood of power outages while supporting community resilience.

Additionally, the Inland Empire already has some of the worst smog in the region, with San Bernardino and Riverside cities ranking as the most polluted cities for ozone particle pollution,[26] contributing to health impacts and poor air quality. This smog is caused by emissions from gas vehicles, gas appliances, and warehouses in the region. Upgrading to energy efficient and electric appliances will reduce smog and ozone pollution and improve air quality in the Inland Empire.

[26] State of the Air 2025 https://www.lung.org/getmedia/5d8035e5-4e86-4205-b408-865550860783/State-of-the-Air-2025.pdf

Figure 14: Riverside County Warm Nights

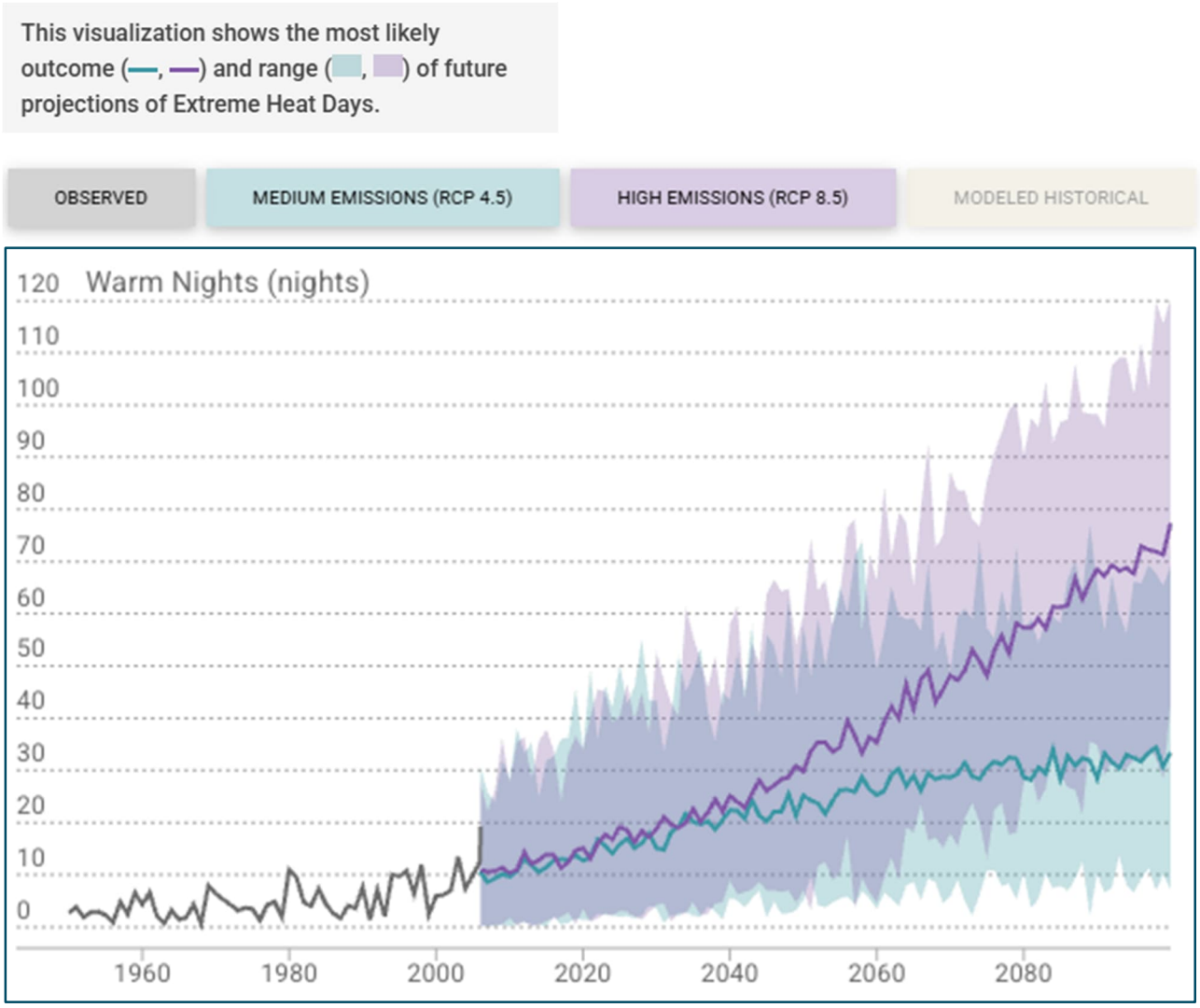


Figure 15: Riverside County Extreme Heat Days

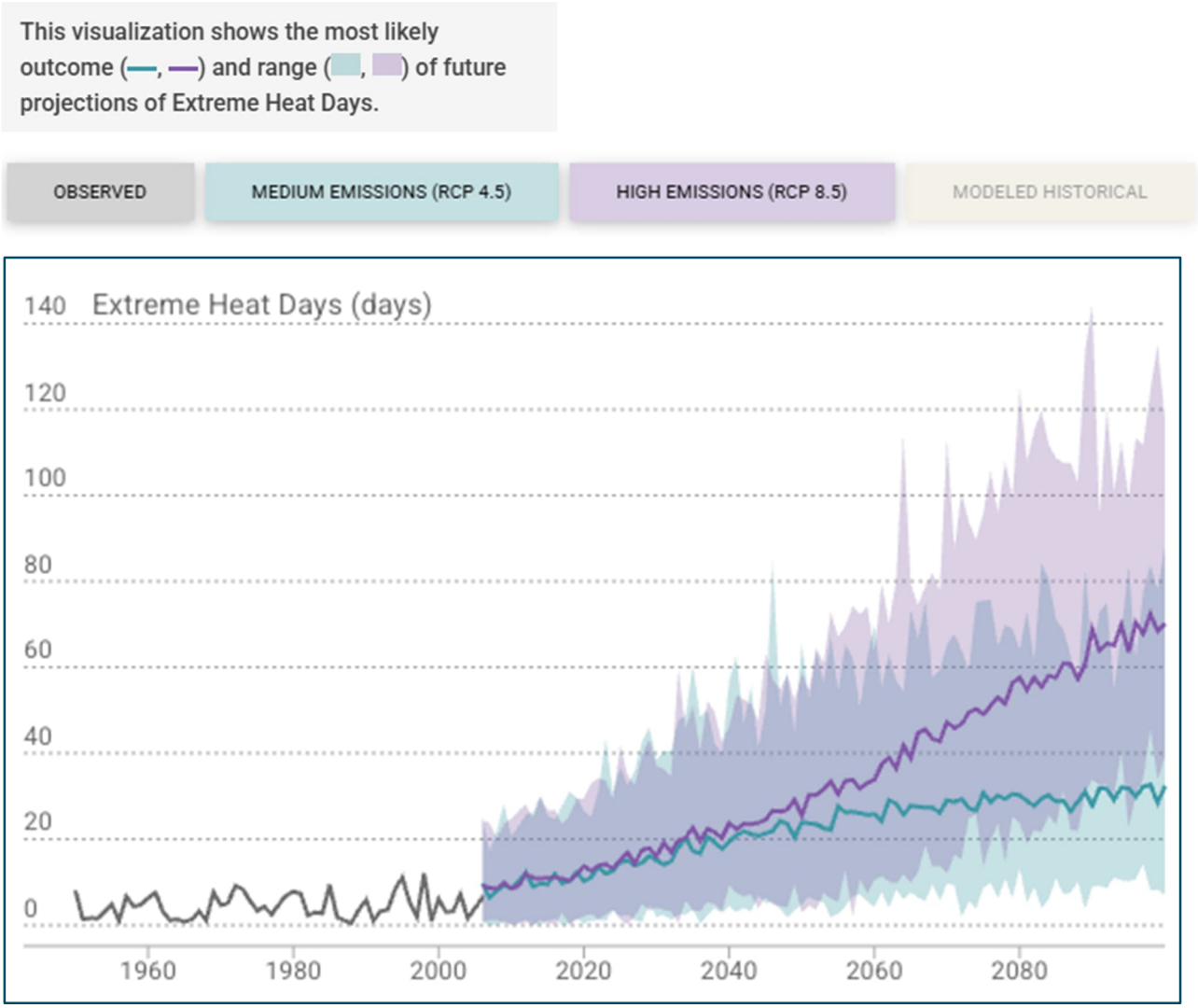


Figure 16: San Bernardino County Warm Nights

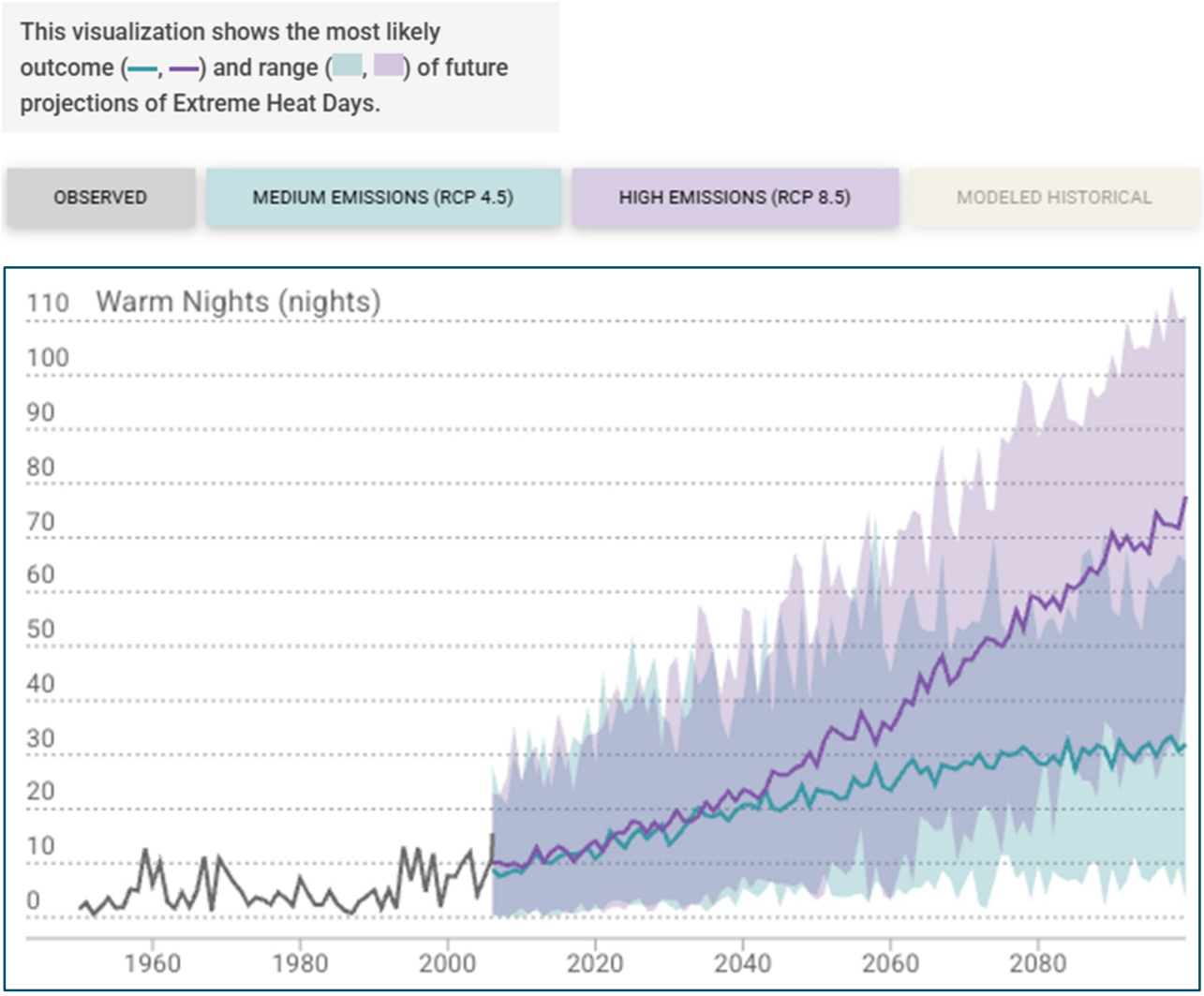


Figure 17: San Bernardino County Extreme Heat Days

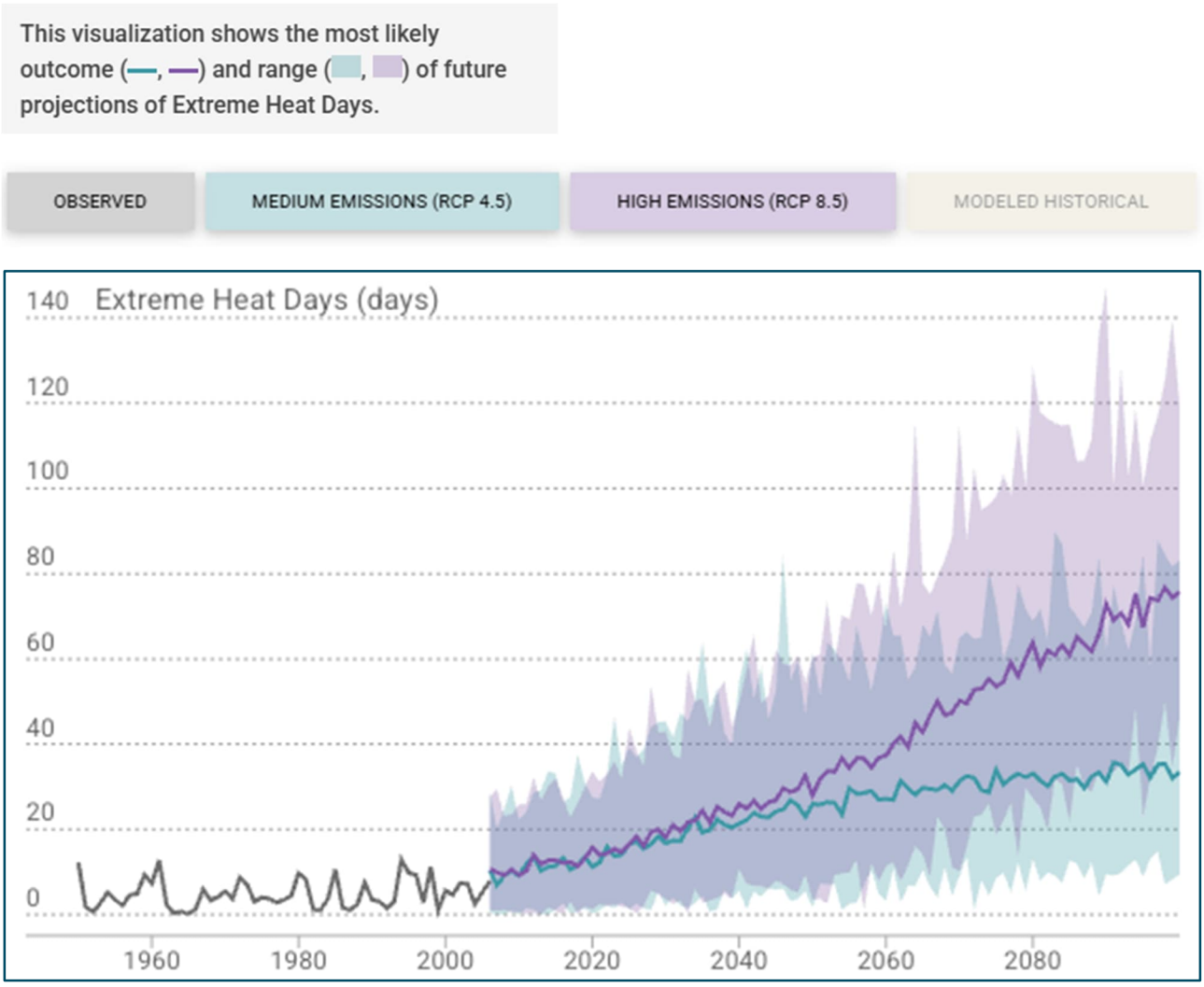
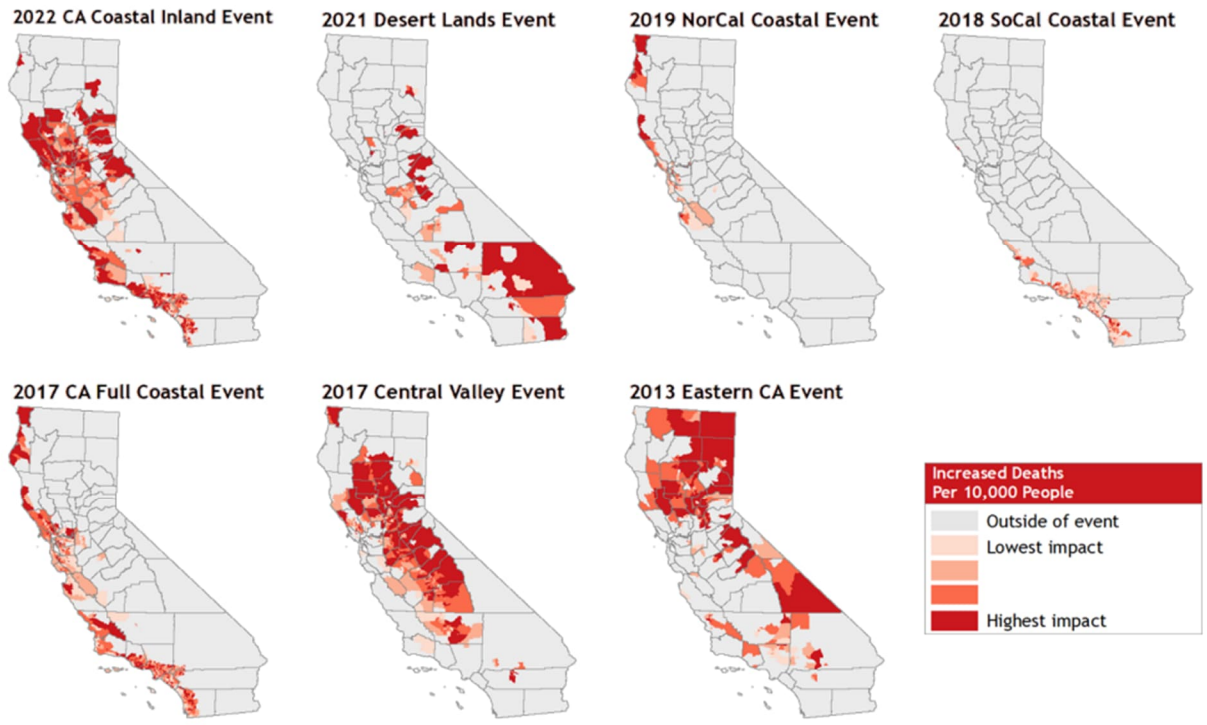


Figure 18: Premature Mortality Impacts Attributable to Extreme Heat by Census Tract and Event



Source: [Impacts of extreme heat to California's people, infrastructure, and economy]; Mortality impacts from Rahman et al. (2022) by Census tract for each event. All maps use the same legend to allow for comparison across events.

Coordination with Regional PAs

In addition to I-REN, the Inland Empire is also served by SoCal Edison (SCE) and Southern California Gas (SoCalGas), and is included in the Southern California Regional Energy Network (SoCalREN) territory. However, due to the various service territory factors described here in Chapter 2, I-REN stakeholders report very limited awareness of or participation in EE programs available in the region and request increased outreach to expand awareness.[27]

[27] See Chapter 8.

I-REN has consulted with other PAs in the IE region on its plans for continuing existing programs in this BPA, in addition to its ongoing coordination as described in Chapter 7. This ongoing collaboration will be crucial for I-REN's overarching goal to expand awareness of other PAs' EE programs in the region. I-REN's approach of continuing existing programs rather than proposing new offerings is part of an intentional effort to avoid potential risks of harmful duplication and help ensure that this BPA is positioned to fill gaps, provide complementary services, and address needs that cannot or are not being addressed by other PAs.

I-REN already engages in active coordination with other PAs as detailed in Chapter 7 and refers customers as appropriate to other PA programs.[28] In this BPA I-REN intends to continue and expand its successful coordination to date with other IE region PAs and continue assessing growth in awareness of EE and regional program uptake in its communities.

Sector Market Characterization

I-REN has developed three sectors (Public Sector, Codes & Standards, and Workforce, Education, & Training Sectors) and two programs within each sector to serve the unique needs of the region. More information about the specific needs of these sectors appears below.

1. Public Sector

In the I-REN service territory, the public sector jurisdictions include two counties, 52 cities, 74 special districts in Riverside County,[29] over 120 special districts in San Bernardino County,[30] 17 tribal areas that range in size from less than a dozen tribal members in the Augustine Band of Cahuilla Indians to more than 300,000 residents in the City of Riverside, as well as unincorporated communities. As heard from I-

[28] see examples in Chapter 3, Strategy 2: Optimize Total System Benefit (TSB) achievement
[29] https://sdarc.specialdistrict.org/our-districts

[30] https://specialdistricts.sbcounty.gov/

REN's stakeholders, I-REN's local governments have limited capacity to complete energy upgrades and are challenged to maintain and upgrade these facilities due to a lack of funding for capital improvements, limited awareness of energy efficiency and other program opportunities, limited time and staff resources, and conflicting priorities. Further, state mandates such as building energy benchmarking requirements from Assembly Bill (AB) 802, energy code compliance, and climate adaptation planning are additional unfunded regulations and requirements on local governments; these requirements are often difficult to meet given competing priorities as well as varying political support for climate-related solutions in many areas of the region.

Many municipal buildings in both Riverside and San Bernardino Counties are considered older and use more energy due to outdated systems and insulation. Yet energy efficiency projects for these buildings and systems usually fall to the back burner due to the lack of capacity and the time and effort for energy upgrades. Municipal buildings and special districts have significant energy usage, with school districts spending more than $8 billion nationwide on energy costs.[31] Supporting energy efficiency upgrades for these larger municipal and special district buildings, which use significantly more electricity than a residential home, will help build resilience and support the energy grid in the region.

Local governments must also engage various staff members from different departments to carry out energy efficiency upgrades. Facilities managers, public works staff, and administrators may all be involved in the process of energy efficiency upgrades and may need to be engaged at different points throughout the process. Engaging the right people at the right time during a building upgrade requires significant coordination and dedicated staff time, which may be difficult given the lengthy timeline required to complete a project and challenges with staff turnover.

[31] https://www.energystar.gov/buildings/resources-audience/k-12-schools

2. Workforce Education & Training

There are not enough trained energy professionals in the region to meet the demand for EE services, which often requires agencies to source them from outside the region.[32] The I-REN Energy Workforce Gaps Assessment conducted by The Energy Coalition highlights an urgent need for skilled workers for energy jobs, projecting that energy jobs will grow by 20% by 2030. This study also identifies that 75% of current workers are expected to retire or transfer within the next five years, indicating the critical importance of a newly trained and skilled workforce.[33]

Of the population in the Inland Empire, 83.3% hold at least a high school diploma—the minimum requirement for many energy jobs. However, access to training programs remains a challenge due to the region's vast geography and low density in many areas. While 100 institutions offer 363 training pathways, gaps in education, workforce alignment, and access to training continue to persist. Another challenge identified in I-REN's EM&V studies is that once a person is trained, it is difficult to place someone with little to no on-the-job experience. I-REN's Workforce Education and Training sector aims to fill this gap by connecting with agencies throughout the region to offer training and build up a skilled workforce.

3. Codes & Standards

There are approximately 1.6 million housing units in the Inland Empire,[34] many of which were built before the 1978 building standards. Existing buildings pose greater challenges for code compliance in comparison to new construction but are a critical portion of housing that should be safe and energy efficient for residents. Despite the importance of code compliance, the number of permits granted

[32] Stakeholder Engagement key finding; see Chapter 8 for details.
[33] I-REN Energy Workforce Gaps Assessment at 18.
[34] https://censusreporter.org/profiles/31000US40140-riverside-san-bernardino-ontario-ca-metro-area/

decreased 25% between 2023 and 2024, translating to 2.5 permits granted per 1,000 residents in San Bernardino County alone.[35]

Common challenges in code compliance include a lack of understanding of codes, especially when they are different or inconsistent region to region, complex or hard to understand codes, frequent code updates, and unclear processes on how to pull permits, as well as the additional cost/high cost of permits. The recent pause on Title 24 building code updates highlights the challenges that many building officials face in catching up to rapidly changing codes and enforcing these changes.

In addition to building officials, other market actors also face similar challenges in achieving successful energy efficiency projects. Building and energy systems designers in the region must be trained in energy efficient practices and, along with contractors, must understand the most up-to-date code requirements, know the permits they need to pull, and then do the work correctly. Auditors must also understand up-to-date energy systems and energy savings measures and each be trained on how to measure energy savings. These actors must all incorporate the most recent energy efficiency requirements into their work processes. These challenges indicate a significant opportunity for C&S-related energy savings and carbon reduction in I-REN's existing residential building stock through code compliant equipment installation, additions, alterations, and renovations.

As described earlier in the Demographic Characteristics section, a significant percentage of workers in the IE face language barriers, in particular, Latino workers, with limited English proficiency impacting 20-27% of Latino workforce as shown in Figure 8 earlier in this chapter. Latino workers are critically important to the growing construction industry in the IE and are also an important equity target population for I-REN as Latino workers face persistent wage disparities, housing inequities, and

[35] https://indicators.sbcounty.gov/economy/residential-real-estate-market/

other barriers.[36] Reaching these workers and increasing their understanding of the energy code and EE equipment installation best practices is crucial for realizing the benefits of EE in this underserved region and for closing the equity gap among Latino communities. Over the past year I-REN has launched Spanish-language simulcast trainings and is coordinating with the statewide EnergyCodeAce team to develop translated energy code educational materials. For 2028 and beyond, increasing outreach to these communities and promoting greater uptake of these translated resources will be a crucial innovation for I-REN educational activities in the C&S sector, with cross-promotion opportunities in WE&T as well.

Jurisdiction engagement also poses a cross-sector challenge within I-REN's territory. I-REN WE&T fellows served as a main point of contact for I-REN's C&S trainings. However, once the fellows completed their cycle and new fellows came in, I-REN's C&S trainings faced a significant decrease in participation from San Bernardino County, indicating that fellows were the primary connection to C&S resources. This demonstrates an opportunity for increased outreach and engagement efforts to promote I-REN's C&S resources across all of I-REN's sectors.

C. Application summary tables of expected performance metrics covering the 4-year and 8-year budget request

The tables below summarize I-REN's expected performance metrics covering the four- and eight-year budget request.

[36] Latino Workers in the Inland Empire | Latino Policy & Politics Institute

Table 2: 4-year Portfolio Budget Forecast Summary (2028-2031) ($000)

	2028	2029	2030	2031	Total (4 years)
Total Budget	18,716	20,182	20,357	22,165	81,419
Resource Acquisition Segment Budget	-	-	-	-	-
Market Support Segment Budget	5,618	6,037	6,824	7,692	26,170
Equity Segment Budget	7,976	8,684	9,291	9,884	35,835
Codes and Standards Budget	4,373	4,654	3,427	3,702	16,157
EM&V	749	807	814	887	3,257
ED Portfolio Oversight	-	-	-	-	-

Table 3: 4-year Portfolio Forecast Summary (2028-2031)

	2028	2029	2030	2031	Resource Acquisition Segment Only (Total 4-year)	Entire Portfolio (Total 4-year)
Total System Benefit (TSB)	$562,987	$624,627	$682,859	$741,429	-	$2,611,902.00
Total Resource Cost (TRC) Ratio	0.03	0.03	0.03	0.03	-	0.03
Program Administrator Cost (PAC) Ratio	0.03	0.03	0.03	0.03	-	0.03
Societal Cost Test (SCT) - Base	0.04	0.04	0.04	0.04	-	0.04
Societal Cost Test (SCT) - High	0.04	0.04	0.04	0.04	-	0.04
Ratepayer Impact Measure Test Ratio (RIM)	0.03	0.03	0.03	0.03	-	0.03

	2028	2029	2030	2031	Resource Acquisition Segment Only (Total 4-year)	Entire Portfolio (Total 4-year)
Lifecycle MWh/GWh	7,252.63/ 7.25	7,615.26/ 7.62	7,996.02/ 7.996	8,395.82/ 8.396	-	31,259.72/ 31.260
First Year MW	0.50	0.52	0.55	0.58	-	2.14
Lifecycle MMTHERMS	0.00	0.00	0.00	0.00	-	0.00
Lifecycle Net Electric CO2 Metric Tons	1,555	1,626	1,720	1,815	-	6,717
Lifecycle Net Gas CO2 Metric Tons	56	59	62	65	-	243

Table 4: 4-year Portfolio Budget Forecast Summary (2032-2035) ($000)

	2032	2033	2034	2035	Total (4-year)
Total Budget	22,898	23,856	24,762	25,702	97,217
Resource Acquisition Segment Budget	-	-	-	-	-
Market Support Segment Budget	7,878	8,203	8,512	8,834	33,427
Equity Segment Budget	10,264	10,687	11,098	11,525	43,574
Codes and Standards Budget	3,840	4,011	4,161	4,315	16,327
EM&V	916	954	990	1,028	3,889
ED Portfolio Oversight	-	-	-	-	-

Table 5: 4-year and 8-year IOUs Total System Benefit Forecast (w/ out C&S) vs. Goals (IOUs and other PAs, as applicable[37,38])

[Not applicable – TSB goals are applicable to investor-owned utilities (IOUs) only. For I-REN TSB forecasts, please see Table 3.]

Table 6: 4-Year and 8-Year Codes and Standards Forecast vs. Goals (IOUs only)

[Not applicable - IOUs only]

Table 7: Portfolio Statewide and Third-Party Contribution Percentage Requirements (As Applicable)

[Not applicable – IOUs/BayREN only]

[37] Required: IOUs should insert the results CPUC Potential and Goals Decision [D.25-xx-xx].
[38] Optional: Non-IOUs may provide goals based on PA specific forecasts.

III. Chapter 3: Portfolio Strategies

A. Compliance with Regional Energy Networks Criteria

I-REN's Business Plan Application has been developed in accordance with the CPUC's guidance governing RENs, including relevant decisions D.12-11-015, D.16-08-019, D.19-12-021, D.21-05-031, and D.23-06-055. I-REN has reviewed the Commission's directives regarding the role of RENs as energy efficiency program administrators and is confident that its proposed portfolio satisfies the Commission's criteria for REN approval.

I-REN was approved by the Commission in 2021 as a Regional Energy Network portfolio administrator serving Riverside and San Bernardino counties. I-REN is a consortium of three councils of governments—WRCOG, CVAG, and SBCOG—that collectively represent dozens of local jurisdictions across the Inland Empire.

Through this regional governance structure, I-REN administers energy efficiency programs that are locally designed, locally governed, and tailored to address the specific market barriers faced in the I-REN region.

Evolution of the REN Model

The Commission first introduced the concept of Regional Energy Networks in D.12-05-015, which invited local governments to submit program proposals for the 2013-2014 energy efficiency cycle. The Commission subsequently approved the first two RENs, BayREN and SoCalREN, in D. 12-11-015.

In that decision, the Commission established that RENs function as independent program administrators with the authority to design and deliver their own energy efficiency programs within the scope approved by the Commission. The decision emphasized that RENs are not third-party programs nor utility partnerships, but instead locally governed program administrators capable of managing and delivering programs independently.

Since their initial approval, the Commission has continued to refine and strengthen the REN framework through subsequent decisions. In D. 18-05-041 the Commission approved multi-year business plans for the existing RENs, recognizing their growing role within the state's energy efficiency landscape.

In D. 19-12-021, the Commission formally acknowledged that RENs had matured beyond their original pilot status, stating that RENs are now an established and integral component of California's energy efficiency policy framework.

That decision also clarified the criteria that new or renewed REN portfolios must satisfy. Specifically, the Commission required that RENs:

- Demonstrate unique value in achieving state energy, climate, and equity goals
- Represent multiple local government entities
- Coordinate with existing program administrators
- Engage stakeholders through the California Energy Efficiency Coordinating Committee (CAEECC)
- Clearly describe their governance structure and program administration model

I-REN meets each of these criteria and demonstrates continued value as a REN program administrator serving the Riverside and San Bernardino Counties.

The Distinct Role of RENs

While RENs share the role of program administrator with IOUs and community choice aggregators (CCAs), the Commission has consistently recognized that RENs serve a distinct and complementary function within the statewide energy efficiency portfolio.

Unlike utilities, REN portfolios are intentionally limited in scope. This limitation reflects the Commission's intent that RENs focus on areas where locally governed entities can provide unique capabilities and address gaps in program delivery.

In D. 19-12-021 the Commission clarified that REN portfolios should demonstrate value through activities that include:

- Activities that utilities or CCA program administrators cannot or do not intend to undertake
- Pilot or innovative programs that could be scaled more broadly if successful
- Programs serving hard-to-reach customers and underserved markets

Because REN portfolios are constrained to these specific roles, they are not evaluated solely through the same cost-effectiveness metrics as large-scale resource acquisition programs. Instead, the Commission evaluates REN performance through their ability to expand access, address equity gaps, and deliver market-supporting activities that enable long-term energy savings.

I-REN's Unique Value

I-REN delivers unique value consistent with the Commission's expectations for RENs.

The Inland Empire represents one of California's largest and fastest-growing regions, comprising approximately twelve percent of the state's population and seventeen percent of its land area. However, the region has historically experienced lower participation in energy efficiency programs due to geographic barriers, workforce constraints, and limited awareness of available programs.

The region's large geographic footprint, extreme climate conditions, and dispersed communities create challenges for traditional program delivery models. As a result, local governments in the I-REN territory have historically lacked the capacity and resources necessary to pursue comprehensive energy efficiency projects or

navigate the available program landscape. I-REN was created specifically to address these gaps.

Through its locally governed structure and targeted program portfolio, I-REN provides services that complement other PA's programs while focusing on the areas where local governments can deliver the greatest value.

I-REN's portfolio centers on three primary sectors:

- Public Sector Programs that support energy efficiency improvements in municipal facilities and community-serving buildings
- Codes and Standards Programs that strengthen compliance and enforcement capacity within local jurisdictions
- Workforce Education and Training Programs that expand the regional clean energy workforce and improve installation quality

Together, these programs address structural barriers to energy efficiency participation within I-REN's region while building the local capacity needed to sustain long-term energy savings.

Coordination and Accountability

Consistent with Commission direction, I-REN coordinates closely with other program administrators serving the region, including Southern California Edison, Southern California Gas Company, and the Southern California Regional Energy Network. These coordination efforts ensure that I-REN programs complement existing offerings and avoid unnecessary duplication.

I-REN also actively participates in statewide coordination efforts led by the California Energy Efficiency Coordinating Committee (CAEECC) and other stakeholder forums.

More recently, D. 23-06-055 established additional accountability mechanisms related to equity and market support activities within the statewide energy efficiency portfolio. These include requirements related to:

- Equity and market support indicators
- Demographic participation data reporting
- Community engagement indicators
- Non-energy benefits evaluation
- Community-based program design

These efforts will further strengthen the measurement and accountability of REN activities. Because REN portfolios focus heavily on equity and market support functions, the Commission has indicated that these indicators will serve as key mechanisms for evaluating REN performance moving forward.

I-REN has actively participated in these statewide initiatives and has structured its proposed portfolio to align with these evolving accountability frameworks.

I-REN's portfolio satisfies the Commission's criteria for Regional Energy Networks. Through its regional governance structure, targeted program design, and strong coordination with other program administrators, I-REN provides unique value within California's energy efficiency framework.

By focusing on public sector energy efficiency, workforce development, and codes and standards support; while prioritizing underserved and hard-to-reach communities, I-REN expands access to energy efficiency programs and ensures that the benefits of California's clean energy transition reach Riverside and San Bernardino Counties.

As the Commission continues to emphasize equity, market support, and community engagement within the energy efficiency landscape, I-REN's locally driven model

will remain a critical component of achieving California's energy and climate goals.

B. Portfolio Strategies for Four-year and Eight-year Plan

Portfolio Strategies Overview

The portfolio strategies provided by CPUC in the BPA template are aligned with I-REN's current activities and proposed plans for evolving and strengthening its existing portfolio over the four- and eight-year horizons. In the sections that follow, I-REN describes its plans related to each of these strategies to provide value to ratepayers within and between its program offerings. The plans described here build on the foundation of I-REN momentum and relationships developed in recent years, which will be crucial to deliver value in each of these strategic areas.

CPUC Portfolio Strategies
1. Advance affordability and mitigate rate impacts
2. Optimize TSB achievement and cost effectiveness
3. Advance building decarbonization
4. Focus electric savings at peak times
5. Use of meter-based savings measurement
6. Promote and deploy equity segment "exempt measures"
7. Increase progress on CPUC's ESJ Action Plan goals
8. Pursue integrated demand-side management (IDSM) activities
9. Increase workforce education and training
10. Regular reporting of demographic data
11. Overcome sector and segment specific challenges
12. Promote responsible refrigerant management
13. Spur innovation differently from previous portfolio

14. Incorporate community-based program design

Over the course of the upcoming business plan cycle, both in the near and in the long term, I-REN will continue to develop cohesion within its portfolio, and crucially, further develop the data gathering and EM&V processes necessary to ensure progress is consistently tracked through current and emerging accountability mechanisms.

I-REN Portfolio Strategies

1. Advance affordability and mitigate overall rate impacts, consistent with Executive Order N-5-24

Affordability concerns and the need to mitigate overall rate impacts have directly shaped I-REN's 2028-2035 portfolio, from the overall makeup of I-REN's proposed programs, the activities it proposes for each program, and the collaborative approach it intends to follow.

- Overall portfolio composition: I-REN and its governing stakeholders decided to maintain current programs and sectors rather than expand beyond its current portfolio scope.
- Data-driven strategic growth: I-REN proposes steady growth in equity-focused and market-supporting activities tailored to meet needs communicated directly by ratepayers in I-REN's 2025 primary research and stakeholder engagement.
- Regional coordination to maximize ratepayer investments: I-REN proposes to educate its public sector and workforce audiences to expand regional awareness of EE and leverage other EE programs in the region for other market sectors to avoid duplication in program offerings.

Proposed Portfolio Composition

Since before its first business plan, I-REN has received input from its stakeholders that the region needs increased EE opportunities for residents, businesses, and industry. I-REN shared its vision for future expansion of its portfolio to other market sectors in its first business plan in 2021:

> I-REN sees a critical need to accelerate action in the region, catalyzing current local government activities related to climate change through targeted and tailored energy efficiency programs, layering other efforts to increase impact. I-REN has focused their first Business Plan on assisting and empowering local governments—county and municipal—and building the professional workforce. To that end this Business Plan covers three main sectors: Public Sector, Codes & Standards, and Workforce Education & Training. I-REN anticipates growing into residential and commercial offerings in future Business Plan filings as necessary to fill gaps and needs in the region.[39]

Locally and regionally, these needs existed prior to 2019 when I-REN began work on its first business plan and have only continued to grow. As I-REN developed its proposed portfolio, the COVID-19 pandemic emerged in 2020 with devastating consequences worldwide and for the Inland Empire in particular. The economic effects of the pandemic have continued to impact the region through the initial years of I-REN's 2022-2027 portfolio. These and other service territory factors (see Chapter 2) have driven continued interest by I-REN stakeholders in expansion to serve residential and commercial customers.

In parallel, statewide affordability concerns over the last few years have had the unfortunate consequence of pitting the Commission's environmental and social justice objectives against a TRC centered cost-effectiveness framework that does

[39] Motion of the Western Riverside Council of Governments on Behalf of the Inland Regional Energy Network (I-REN), for Approval of its Energy Efficiency Rolling Portfolio Business Plan and Budget, February 26, 2021, at 5.

not adequately account for the costs and benefits of EE for equity communities and foundational work to build sustainable EE markets.

RENs are limited to a specific set of criteria and charged with doing the challenging and innovative work of reaching communities who have been overlooked by mass market EE programs. Because RENs have a built-in limit and purpose for their program portfolios, they are not subject to cost-effectiveness requirements. The Commission's establishment of the equity and market support segments of the statewide portfolio further cemented the reality that equity and market support programs are vital to the EE landscape and applying a cost-effectiveness requirement would be directly at odds with their purpose. However, despite the specific limits on REN portfolios, their significantly lower budgets than utility PAs, and the importance of equity and market support EE programs, RENs continue to be a target for defunding due to California's energy bill affordability crisis and other overarching economic challenges in the U.S. The cruel irony is that these cascading economic crises most impact the equity communities that I-REN and other RENs are purpose-built and committed to serve.

RENs were established in California to increase access to energy efficiency programs in historically underserved, disadvantaged and hard-to-reach communities. Their purpose is to provide more equitable opportunities for participation, bolster local workforce capacity, and generate economic benefits within the regions they serve. Although Executive Order N-5-24 focuses primarily on utilities and state agencies in their efforts to lower energy rates and support long-term system affordability, RENs still fulfill a distinct and complementary function. Through locally tailored, equity-focused initiatives, RENs help lower energy expenses for households, businesses, and public institutions while ensuring that the benefits of clean energy investments reach the communities who need them most of all.

Advancing affordability is central to the operation of each REN. Despite having much smaller budgets than other PAs, RENs provide targeted services which offer

financial support to ratepayers, reduce project costs, make participation easier, and fill gaps in utility programs for disadvantaged, underserved, and hard-to-reach communities. Through these gap-filling efforts, RENs develop solutions that are closely in line with local priorities; these efforts help residents and businesses navigate the immediate challenges of the energy market while setting up resilience in local communities across the state, in line with the goals of Executive Order N-5-24.

For I-REN, affordability means enabling public agencies to reduce their total energy costs through energy savings, access to incentives, reduced maintenance costs, and reduced administrative burdens. I-REN brings together three COGs and utilizes their connections with the local jurisdictions in the region to reduce energy usage and make energy upgrades in public agency facilities. I-REN's longstanding relationship with agencies in these COGs helps ratepayer-funded programs actually reach those who need them most.

I-REN's Key Affordability Tactics

a) Reducing energy bills through tailored efficiency support

- Personalized technical assistance and energy assessments for underserved jurisdictions that reduce the cost and complexity of upgrades. To date, I-REN has identified an estimated lifecycle savings of over 60 million kWh and 27,900 Therms of energy savings for its agencies. I-REN has also identified an estimated $14.9 million in utility bill savings and over $5 million in incentives for agencies across the region.

- I-REN's NMEC Program (known publicly as Cash for Kilowatts), provides incentives for efficiency improvements based on net meter-based energy savings, directly lowering energy consumption and bills for public agencies.

- Navigation of grants, rebates, and financing options, ensuring participants secure all available resources to reduce costs and improve project affordability.

I-REN Public Sector NMEC Project Case Study

Colton Joint Unified School District (CJUSD) partnered with I-REN to complete an interior LED lighting retrofit at Joe Baca Middle School, improving efficiency across 72 classrooms. The school is located in a hard-to-reach and disadvantaged community. Through benchmarking support, AB 802 compliance assistance, and project coordination, I-REN helped CJUSD increase equipment efficiency and secure incentives covering roughly 80% of project costs.

To mark the milestone, CJUSD and I-REN celebrated the project's momentum with a check presentation for the first incentive. The presentation highlighted the district's early progress toward energy savings and reinforced the partnership's role in helping secure critical funding.

This project successfully completed its measurement and verification period in December 2025, and the district is slated to receive the final 60% payout, bringing the total received to $220,872.

Figure 19: First Check Presentation with Colton Joint Unified School District

"Despite tight budgets, this check is more than enough to fund one teacher in the classroom. Now that's impact."
- CJUSD Energy Liaison

I-REN Public Sector Technical Assistance Case Study

I-REN played a crucial role in assisting the City of Eastvale in navigating the Energy Efficiency and Conservation Block Grant (EECBG) application process, securing vital funding for municipal energy projects in this SB 535 disadvantaged community.

Although the City of Eastvale is an SCE public sector ratepayer, they were not able to qualify for I-REN's NMEC program incentives because they do not own their facilities.

To ensure this agency could still receive the benefits of their contributions to ratepayer-funded EE programs, I-REN provided technical assistance to identify and obtain other sources of funding for energy projects.

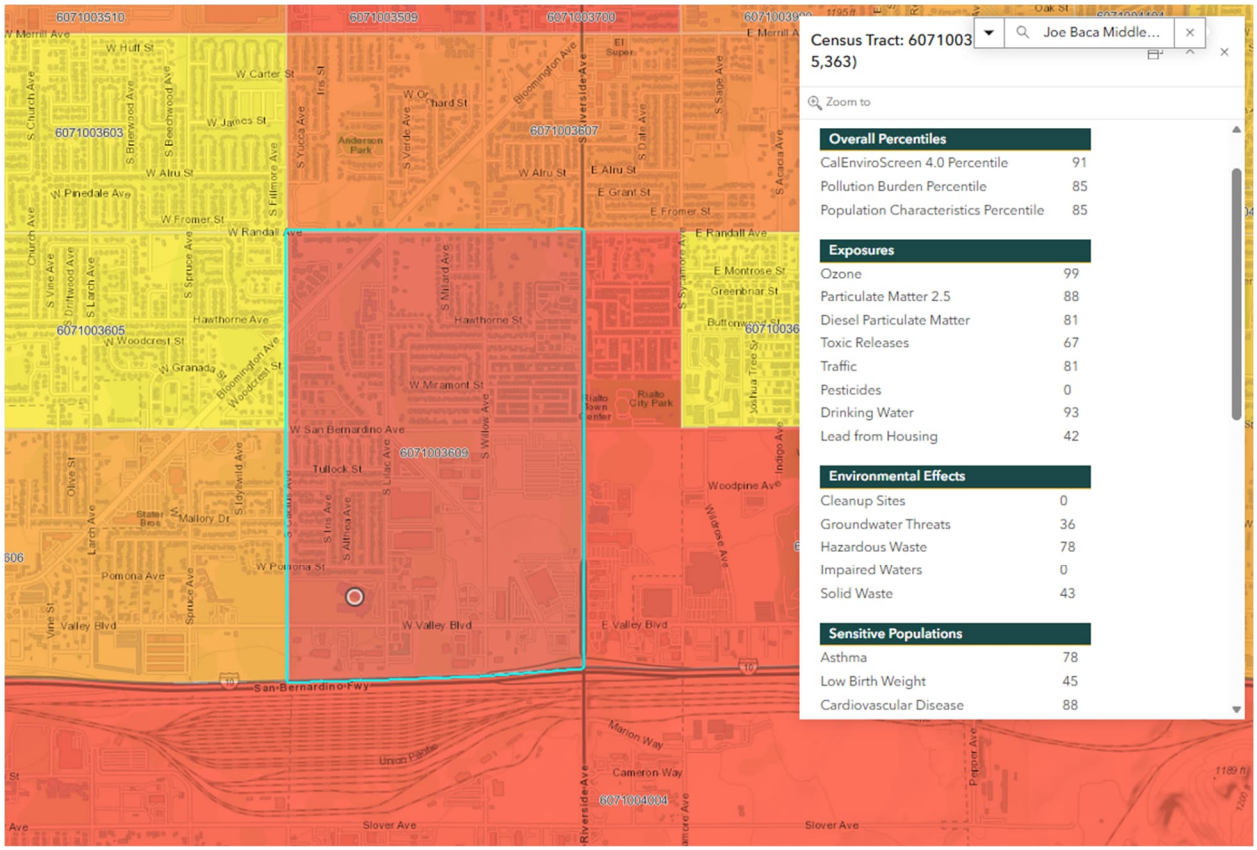
"With I-REN's dedicated support and guidance through the Energy Efficiency and Conservation Block Grant application, the City of Eastvale secured over $120,000 in federal funding.
This partnership demonstrates the power of regional collaboration in advancing our community's energy goals and building a more sustainable future for Eastvale residents."
— City of Eastvale

b) Expanding awareness and access for equity communities

- Programs designed specifically for underserved and hard-to-reach public agencies with limited capacity, for example, Joe Baca Middle School. See project case study in previous section and the figure that follows, showing the school's location with a disadvantaged community.
- Support that closes participation gaps in energy efficiency programs, aligning with EO N-5-24's emphasis on equitable and transparent access to energy programs.

- Outreach to empower public sector and workforce stakeholders as local leaders to increase awareness of energy efficiency benefits and program opportunities across all market sectors.
- Efforts to increase awareness and implementation of building codes that save communities on their energy costs.

Figure 20: CalEnviroScreen Results for Joe Baca Middle School



Source: CalEnviroScreen 4.0 data from California Office of Environmental Health Hazard Assessment, available online at https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0

c) Strengthening local economies and creating pathways to clean energy jobs

- Workforce training, including I-REN's Energy Fellows program, which builds local capacity, supports high-road career pathways, and maintains affordability by expanding the pool of skilled practitioners.
- Programs that increase awareness of energy training opportunities and pathways for all educational levels that lead to family-sustaining wages.
- Programs that offer local economic opportunities by supporting small contractors and local governments participating in and benefitting from the clean energy transition.
- Connections between I-REN C&S programs that drive demand for EE and in turn increase demand for workforce development and energy professionals.
- I-REN WE&T coordination with the ESA program to provide job opportunities locally and increase EE access for low income communities in the IE.

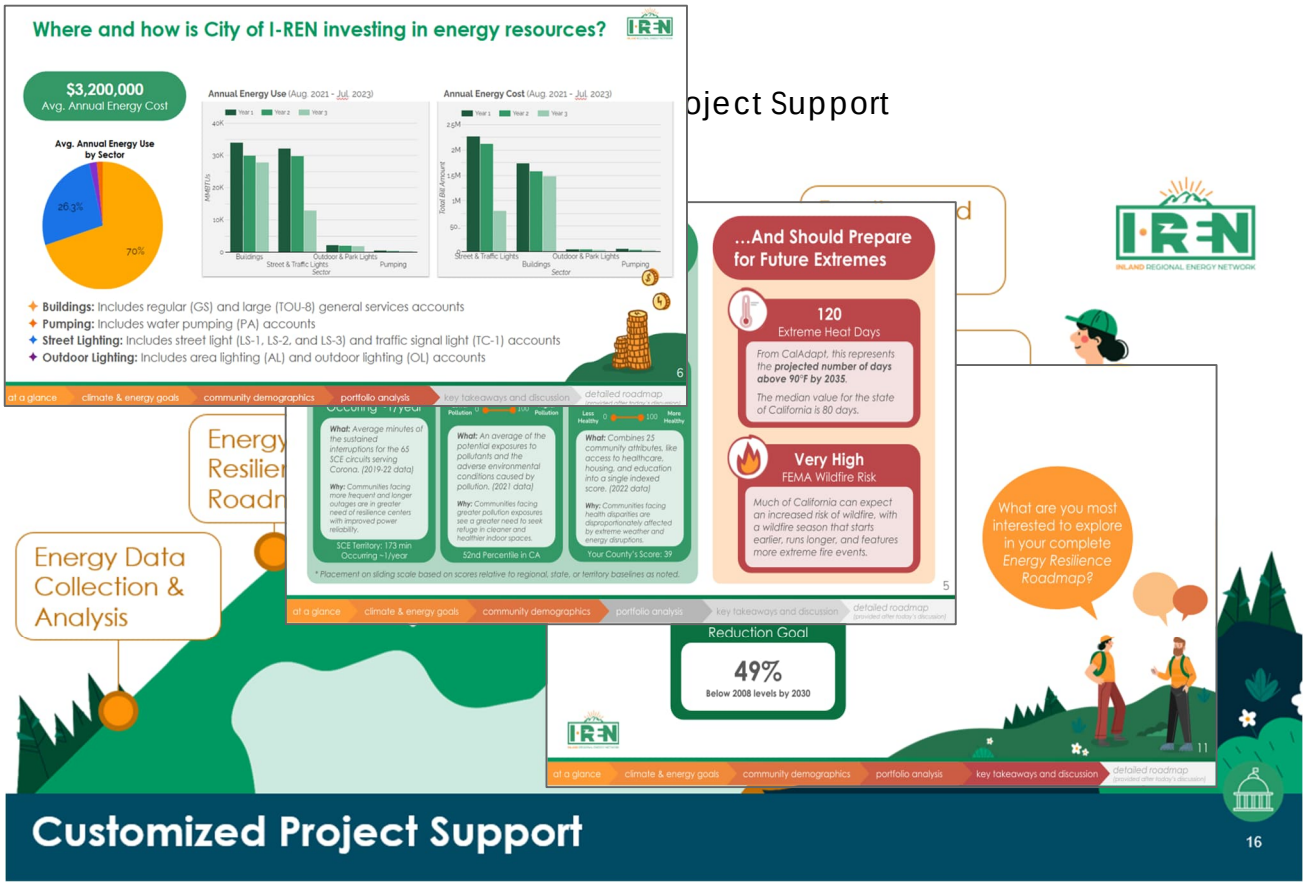
d) Utility bill analysis through Energy Resilience Roadmapping

- I-REN's Technical Assistance (TA) and Strategic Energy Planning program supports identifying project opportunities through energy benchmarking and utility bill analysis, including I-REN's Energy Resilience Roadmap deliverables and performance benchmarking through Energy Star Portfolio Manager (ESPM) and I-REN's Building Upgrade Concierge (BUC) platform. This initial and routine analysis helps agencies understand existing facility conditions, prioritize energy efficiency and IDSM audits, and leads to the identification of EE and IDSM projects.
    - To date, I-REN has supported energy benchmarking in ESPM for 5.5M square feet of public agency building gross floor area.
- I-REN's Energy Resilience Roadmapping (ERR) examines an agency's climate plans, energy goals, community vulnerabilities, and energy performance across its portfolio to help identify energy-intensive buildings and pumping

sites for potential EE and IDSM projects that deliver operational efficiencies and utility bill cost savings. Through our utility bill analysis conducted as part of the ERR development process, we identified upwards of 8 meters billed under incorrect tariff/rate classifications, resulting in the customer paying more than necessary. I-REN supports customers in taking the next steps to correct their rate classification and reduce utility costs, ensuring optimized billing and long-term operational savings that support affordability outcomes in the I-REN region.

- Since program inception, I-REN has delivered 45 preliminary energy roadmaps analyzing energy use data across public agency facility portfolios.

Figure 21: I-REN Public Sector Energy Resilience Roadmapping Examples

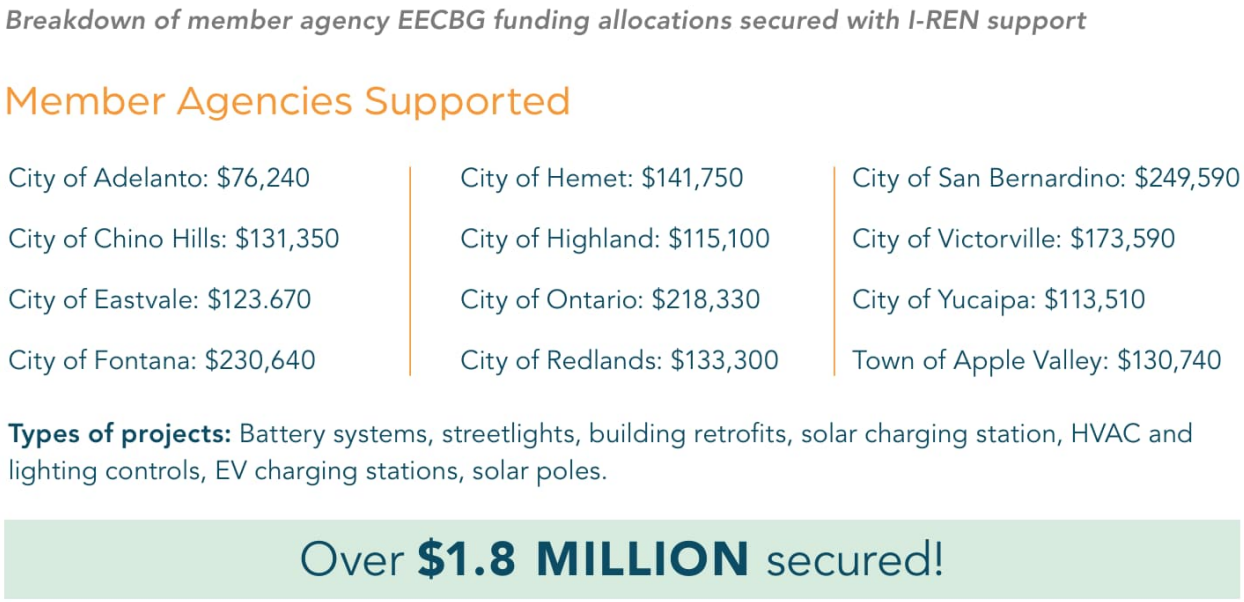


- Often, public agencies are not aware of their electricity rate and do not know about different rate structures that can be accessed to save money by promoting lower usage during periods with peak energy use. During the energy audits of public facilities, there have been several instances in which auditors have identified that these agencies were at an incorrect rate and have upgraded them to a more advantageous rate to save them money on their energy bills. These efforts continue to save energy and money for underserved local jurisdictions.

2. Optimize TSB achievement and cost effectiveness, as well as TSB achieved per ratepayer dollar spent

In D.23-06-055, the CPUC reaffirmed the purpose of equity programs as achieving benefits that cannot as readily be monetized, saying that instead of applying a cost-effectiveness threshold to equity programs, CPUC prefers to assess the specific benefits and outcomes they achieve, whether or not they can be monetized. I-REN's equity segment programs deliver a wide array of comprehensive benefits in addition to energy savings, as further described in I-REN's 2024 Annual Report, including non-energy and capacity-building benefits as well as audits identifying millions of dollars in utility bill savings that I-REN's public sector equity programs can help agencies realize. For example, in 2024 I-REN supported 12 agencies (100% of which were underserved and/or HTR agencies) secure over $1.8 million in Energy Efficiency and Conservation Block Grant (EECBG) funding through targeted support during the application process, which amounted to approximately 30% of all EECBG funds allocated to I-REN member agencies.

Figure 23: IE Public Agency Grant Funding Secured through I-REN Assistance



I-REN has one program that is specifically designed for delivering claimable energy savings and TSB for equity customers: the IREN-PUBL-002: Public Buildings NMEC Program, within the equity sector. This program strongly relies on support from I-REN's other equity segment program, IREN-PUBL-001: Technical Assistance and Strategic Energy Planning Program, as well as the IREN-WET-002: WE&T Workforce Development Program in the market support segment, to supplement local agencies' staff capacity to move NMEC projects forward through I-REN's equity resource program.

Because the public agency NMEC program generally provides comprehensive projects to these agencies, all of which must be monitored over a 12-month period after construction completion in order to confirm actual results, I-REN anticipates that its TSB claims will increase in the years between application submittal and the start of the new portfolio period. As of December 2025, I-REN has steadily built a robust pipeline of committed NMEC projects, with over $1 million in incentives reserved and/or distributed, and an estimated 12.4 million kWh in lifetime energy savings, which will be realized in the coming years. I-REN anticipates that this

number will continue to grow with changes to the outreach approach for public agencies and the increase in the Fellows program.

There are additional benefits that I-REN has contributed to the region through its other programs. Through I-REN's TA Program, I-REN identifies holistic energy projects that deliver deep, persistent savings that result in maximized TSB delivery for the NMEC program. Since program inception, I-REN has developed 80 Initial Measures List (IML) for public agencies which includes identifying potential energy efficiency upgrades, estimated project costs, Cash for Kilowatts Incentive eligibility, and other possible funding sources.

The majority of projects supported by the TA program are going through the NMEC program (Cash for Kilowatts). Through ongoing collaboration, projects that I-REN has been tracking but have not gone through NMEC, are channeled through other PA programs (i.e., SoCalGas' Public Direct Install program or SoCalREN's Rural-HTR Direct Install program). See table below for a sampling of savings channeled to other PA programs.

Table 8: I-REN Project Referral Examples

Agency	Program	Project Scope	Annual Gas Savings (therms/year)	Lifetime Gas Savings (therms)
City of Colton	SCG Public Direct Install program	13 tankless water heaters and 200 inches of pipe wrap insulation	5,200 Therms	127,995 Therms
City of Blythe	SoCalREN Hard to Reach Direct Install program	Replacement of 3 gas storage heaters with two tankless gas water heaters and one HPWH	3,871 Therms	22,713 Therms

I-REN also identifies and supports stacking of funding sources (including application assistance as needed) to maximize all available resources and reduce reliance on ratepayer-funded EE investments. Grant support to date has been focused on:

- CA State Library's Building Forward Grant
    - *City of San Bernardino's Norman F. Feldheym Central Library*
        - *$6,400,000 Building Forward Grant paired with $304,000 estimated I-REN NMEC incentives*
    - *City of Murrieta's Library*
        - *$1,500,000 Building Forward Grant paired with $31,000 estimated I-REN NMEC incentives*

Figure 24: Murrieta Public Library

By supplementing ratepayer dollars with other funding sources, I-REN helps deliver more cost-effective projects for participants.

3. Advance building decarbonization activities in EE portfolios

Regional Energy Networks are designed to deliver energy efficiency and decarbonization programs to underserved communities, enabling underserved jurisdictions to take part in the energy transition. In I-REN's case, a significant majority (89%) of local governments in their service area are considered underserved. Many jurisdictions in the region have set GHG reduction targets for municipal emissions in their Climate Action Plans, but often lack resources and technical knowledge to enact significant energy efficiency or electrification upgrades for municipal facilities.

I-REN plays a key role in the region by supporting underserved and hard-to-reach local governments, K-12 schools, tribal communities, and special districts in reducing municipal emissions and meeting their overall GHG reduction goals. In the Public Sector, I-REN provides critical services and connection to financing opportunities to support building decarbonization through its Technical Assistance and Strategic Energy Planning Services. These wraparound services provide customized support to build knowledge and capacity for public agencies to enact energy efficiency and electrification upgrades for building decarbonization.

I-REN introduced a greenhouse gas (GHG) impact metric to Energy Resilience Roadmaps to quantify the total metric tons of CO_2e that would be reduced if all proposed energy projects were implemented. I-REN also calculates the percentage of the agency's overall GHG reduction goal that these projects would achieve, based on their published Energy or Climate Action Plan. This added metric helps show how these projects support broader agency and regional climate targets.

> " These [climate and energy goal] metrics will help guide our CAP development efforts. " — City of Chino Hills

I-REN's Building Upgrade Concierge service is a web-based tool that includes energy benchmarking and analysis, energy modeling and recommendations for energy efficiency and electrification upgrades, and measurement and verification services to track how well projects are performing. Collectively, the Building Upgrade Concierge service highlights opportunities for decarbonization of key municipal and special district facilities. I-REN's technical assistance services support jurisdictions in identifying and planning for decarbonization upgrades.

I-REN's NMEC, or Cash for Kilowatts Program, provides further incentives to jurisdictions to enact energy efficiency and electrification decarbonization efforts. Cash for Kilowatts seeks to drive measures that focus on electric savings at peak times by providing incentives of $200 per kW saved. This makes energy efficiency investments more attractive for jurisdictions and reduces building energy usage.

In the Codes & Standards and Workforce Education and Training Sectors, I-REN is also providing locally tailored trainings for building departments as well as for contractors on supporting safe implementation of codes and standards for building decarbonization. These under resourced communities may otherwise lack capacity and technical knowledge required to keep up with ever-changing energy efficiency codes. I-REN's work includes facilitating permitting for electric heat pumps and heat pump water heaters (HPWHs) to ensure I-REN's communities are part of the transition to an all-electric future. Given future increases in the cost of natural gas infrastructure as those costs are spread over fewer customers, it is critical to ensure an equitable and affordable electrification transition for underserved community members.

In response to requests from local jurisdictions and I-REN Executive Committee members, I-REN plans to begin offering support to local jurisdictions to develop local electrification plans in order to comply with AB 39. I-REN also plays a role in local outreach related to the California Energy Commission (CEC) Equitable Building Decarbonization program, aimed at whole-home direct install

electrification for disadvantaged residents. As a member of the Southern Region team for the program, I-REN leverages its trusted relationships with local governments to help expand outreach to the IE. See Chapter 7 for additional information.

4. Focus electric savings at peak times with high avoided cost and TSB

I-REN's programs provide opportunities to increase education and awareness about peak energy usage and time-of-use (TOU) rates, through incentives and technical assistance. The Cash for Kilowatts program seeks to drive measures that focus on electric savings at peak times by providing incentives of $200 per kW saved. I-REN also provides technical assistance and outreach that offers an opportunity to raise awareness among public agencies regarding TOU rates to lower electricity usage during peak periods for participating public agencies . This will be particularly relevant for facilities with 24/7 operations or operations outside of traditional business hours, such as community centers, parks and recreation facilities, and emergency operations facilities.

I-REN's approach to IDSM technical assistance supports addressing peak load by conducting audits and identifying measures for permanent load shifting strategies and shifting energy usage to off-peak hours.

I-REN's TA program 1) targets energy savings when grid value is high by prioritizing measures that reduce energy consumption during peak periods, 2) Educates and trains customers to increase awareness and benefits of reducing peak demand through the provision of information and resources on DR program enrollment, TOU, and bill savings awareness, and 3) Identifies and proposes technologies that have Demand Response (DR) capabilities and/or controls, enabling program participants to enroll in a DR program that helps lower peak demand. I-REN firmly believes the most valuable kilowatt is the one not used.

5. Use of meter-based savings measurement

Energy modeling and planning are important steps in assessing opportunities for energy-saving upgrades, but meter-based methods for savings measurements through an NMEC methodology enable participants to receive incentives for actual savings realized at the meter.

One of I-REN's Public Sector programs, the Cash for Kilowatts Program, utilizes an NMEC approach. I-REN's program team measures a building's energy meter consumption before and after an energy upgrade, and provides up to $2 in incentives to local governments and special districts for each kWh saved.

For projects that do not qualify for NMEC, I-REN refers customers to other PA's programs, including SoCalREN. Through a meter-based savings approach, the Cash for Kilowatts program allows participants to capture stranded savings while safeguarding ratepayer funds by rewarding only verified, realized savings.

San Bernardino Valley College Cash for Kilowatts Project Case Study

San Bernardino Valley College Interior LED Lighting Retrofit

SBCCD is upgrading the interior lighting at San Bernardino Valley College North Hall and Library

Lifetime Electric Savings 1,481,352 kWh **Cars Off the Road** 232 cars per year	**Lifetime Electric Cost Savings** $353,412	**Incentives Secured** $226,579, ~74% of gross project cost

SBCCD leveraged Cash for Kilowatts incentives to implement a comprehensive efficiency upgrade projected to deliver approximately 1.48 million kWh in lifetime electric savings and an estimated $353,412 in avoided lifetime utility costs. Incentives totaling $226,579 covered roughly 74% of total project costs, significantly reducing upfront financial barriers and demonstrating the program's ability to improve project affordability while supporting large-scale public sector energy efficiency investments.

In parallel with the Cash for Kilowatts program, the TA program provides supplemental support to public agency staff in educating about and navigating facility-specific NMEC M&V report findings, which also supports proper maintenance of energy consuming equipment at facilities. The program also refers public agencies to I-REN's Codes & Standards program for support. As the market or target participants expand, the TA program allows for flexibility in designing and delivering additional educational opportunities, such as webinars or tailored presentations.

6. Promote and deploy "exempt measures"[40] in the equity segment, including targeted outreach and engagement and pilots to identify and develop solutions for key barriers, needed education and training/workforce readiness and technical assistance, and other relevant elements. In developing these strategies, PAs should evaluate barriers faced by specific customer types, including small business customers and tenants of multifamily buildings, relating to the implementation of exempt measures (OP 6 and COL 3, D.23-04-035)

I-REN's Public Sector TA program provides energy audits for public agencies. I-REN also offers a Building Upgrade Concierge service, an online technical support platform to help agencies understand opportunities for energy efficiency upgrades. Recommendations from the Building Upgrade Concierge service and the audits include exempt measures such as building weatherization and pipe insulation.

Within I-REN's jurisdiction, mixed political views may also pose barriers to training and uptake of electrification projects from public agencies and residents in the region. This, coupled with significant power shut-offs in the region during extreme heat days in recent years, can contribute to lower interest from the market. Exempt measures that focus more on "common sense" energy efficiency upgrades may resonate more with the region's public agencies and population at large. It is important for I-REN's cross-cutting codes and standards and WE&T programs to

[40] As defined by D.23-04-035.

ensure contractors are trained in non-exempt measures to cater to customers that may be resistant to electrification projects.

7. Increase progress on CPUC's ESJ Action Plan goals[41]. Reference the specific ESJ Action Plan Goals and the EE portfolio strategy. Describe your approaches to advancing these goals.

Equity, as defined in the CPUC's ESJ Action Plan 2.0, with a particular emphasis on the goal of delivering energy efficiency to hard-to-reach, underserved, and disadvantaged communities, is embedded in the mission and structure of California's Regional Energy Networks. The REN approach to ESJ centers on governance and access, elevating community needs in program design, strengthening local capacity to participate in clean energy planning, and creating pathways for long-term involvement in the clean energy economy. Through locally tailored initiatives, I-REN translate ESJ Action Plan priorities into practical, community-responsive solutions that promote more equitable outcomes.

ESJ Goal 2: Increase Clean Energy Investment in ESJ Communities

I-REN expands the reach and effectiveness of clean energy programs in its underserved jurisdictions, including its disadvantaged communities. By collaborating with local governments and community-based organizations, I-REN tailors offerings to cultural, linguistic, and geographic contexts. For example, I-REN launched simultaneous Spanish translation for its online trainings to reach a broader suite of interested contractors. Moreover, I-REN's suite of public sector programs for local government facilities, including IDSM project support, as well as its Energy Fellow program that places Fellows in underserved agencies both ensure that clean energy resources reach communities where they can deliver the greatest environmental and public health benefits, such as improved air quality.

[41] Available online: https://www.cpuc.ca.gov/ESJactionplan/

ESJ Goal 4: Increase Climate Resiliency in ESJ Communities

Building climate resilience requires strong local systems and the ability to effectively prepare for and respond to climate-driven challenges, including secondary impacts such as power outages. I-REN supports resilience by helping public agencies, housing providers, and community institutions improve building performance and operations, reducing energy usage and peak demand, and reducing the likelihood of power shut offs during extreme heat events, which are a significant concern for I-REN communities. I-REN plans to grow its IDSM offerings in the coming years, to provide local jurisdictions with technical assistance and project delivery support for IDSM measures, as well as additional contractor trainings and workforce development related to IDSM and resiliency. These improvements also strengthen public facilities and community spaces, enabling ESJ communities to better withstand climate-related impacts while advancing broader state resilience objectives.

ESJ Goal 5: Enhance Outreach and Public Participation

Effective community participation depends on access to information and trusted engagement channels. I-REN has expand this access by partnering with local institutions, offering workshops and educational resources, and tailoring outreach to regional and cultural contexts. These efforts help residents, public agencies, and community-serving organizations understand and influence how clean energy programs operate in their communities. In doing so, I-REN advances the ESJ Action Plan's goal of increasing meaningful participation and subsequent program benefits, even for communities that may face barriers to engaging in formal CPUC processes.

This goal is of particular importance for I-REN. In early 2025 I-REN began conducting stakeholder engagement with its local government to inform this application. One of the resounding themes was a continued need for energy efficiency assistance across all market sectors—not just public sector, workforce, and codes and

standards as included in I-REN's 2022-2027 portfolio, but also residential, commercial, and industrial. I-REN conducted a review of available programs in the region to assess whether there were existing programs that could meet those needs, or if I-REN needed to expand its portfolio to cover additional market sectors.

I-REN found that while there were existing programs that potentially could address those other sectors' needs, there remains a major gap in awareness of those programs and of the benefits of energy efficiency in general. Being mindful of the affordability crisis and the need for judicious use of ratepayer funds, I-REN elected not to expand its portfolio to other market sectors at this time. Instead, I-REN's stakeholders requested that I-REN enhance its outreach practices to empower local leaders—such as elected officials, local building department and permit counter staff, chambers of commerce, workforce development boards, training providers, and building professionals—as a way to share energy efficiency knowledge and program opportunities with residents and business owners in I-REN communities.

I-REN also enhances its outreach and public participation through its collaboration with the Local Government Sustainable Energy Coalition (LGSEC). LGSEC is a statewide membership network representing local government interests related to EE, clean energy, and climate resilience to state regulatory agencies. LGSEC members advance sustainable energy and climate solutions to meet California's decarbonization goals through knowledge exchange, targeted learning opportunities and statewide collaboration. To advance public participation, I-REN offers its member agencies a sponsored, one-year membership with the LGSEC. In 2025, I-REN had 12 agencies signed up for LGSEC membership, allowing these agencies to participate in the energy policy landscape.

ESJ Goal 7: Promote Workforce and Business Development

I-REN supports economic development in ESJ communities through high-road workforce and business development initiatives. Programs such as I-REN's

Workforce Education & Training efforts prepare residents for careers in the growing clean energy and building sectors, emphasizing skill-building and upward mobility. By supporting local workers and small businesses, I-REN helps cultivate a more diverse clean energy workforce and expand high-road opportunities within the regional economy.

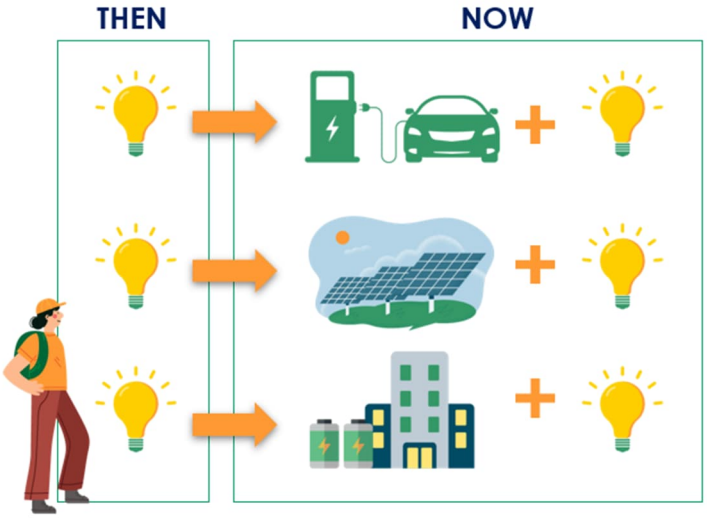
8. If you would like to pursue integrated demand-side management (IDSM) activities within your portfolio, propose your strategy including technologies, target customer engagement tools, etc.

I-REN will be incorporating IDSM activities into multiple elements in its program portfolio. Many I-REN member agencies shared the need for more IDSM opportunities, in part due to power shutoffs that have impacted operations, including for critical public facilities, throughout I-REN's service area.

Figure 25: I-REN's Public Sector Working Group Meeting Summary

To support greater resilience in the Inland Empire, I-REN has already begun and will continue to do the following: incorporate IDSM information and training into its WE&T programs and additional educational opportunities such as workshops for

public sector staff; incorporate IDSM technical assistance and recommendations into all audits for the TA program; and explore the option to include an additional kicker incentive for the NMEC program for jurisdictions who incorporate IDSM measures in addition to energy efficiency upgrades. The capability to layer energy efficiency projects with non-energy efficiency IDSM measures is a vital approach to support safer and healthier spaces for I-REN's community members and achieve California's energy and climate goals. Together, this will provide greater customer awareness and professional expertise for resilience efforts that can support critical facilities during power outages.



While I-REN intends to incorporate IDSM components into its entire portfolio, the TA program offers the clearest pathway to support IDSM developments across I-REN territory. Aligned with strategies approved in the recent IDSM resolution, I-REN is launching IDSM support services in early 2026 under the TA program, which will serve as a model for IDSM services through the application period.

In parallel with energy efficiency support, I-REN will be conducting distributed energy resources (DER) audits at public agency facilities to assess the implementation of identified DER strategies, including but not limited to demand response, electric vehicle charging, solar water heating, solar PV and battery storage systems, permanent load shifting, water efficiency, and electrification. I-REN will evaluate existing equipment to determine its readiness for future Virtual Power Plant aggregation and identify measures that could support future participation. As part of our integrated EE and DER audits, a measure phasing plan

will outline the optimal sequencing and implementation timelines, and a financial assessment will define viable funding and financing pathways.

Participating agencies will also benefit from I-REN's comprehensive project management assistance, with support for DER projects, which includes technical specifications guidance, procurement assistance, construction management support, and incentive application services. I-REN will host educational and informational webinars to engage agencies and share best practices for implementing DER and IDSM technologies. I-REN will continue developing a comprehensive suite of collateral, including marketing materials, case studies, and technical guidance, to effectively communicate program offerings and participation pathways. Outreach efforts will leverage established communication channels such as email campaigns and social media, supplemented by direct engagement with agencies to ensure broad awareness and strong uptake of services.

Figure 26: I-REN's IDSM Launch Webinar Panelists

9. Increase workforce education and training to better deliver quality EE installations

Increasing WE&T in the IE continues to be a main focus across all I-REN programs, not just workforce, in alignment with the CAEECC Equity Advisory Committee's guidance in their Initial Memo, in which they noted that "[a] A more integrated approach ensures that workforce readiness is tied directly to program delivery, community benefits, and long-term portfolio resiliency.[42] I-REN's proposed 2028-2035 portfolio continues and builds on its current framework of workforce training and pathway development across all three sectors:

- Public Sector: I-REN sponsors Energy Fellows through its WE&T program to supplement public agency staff capacity to take on EE projects; I-REN also empowers local agency staff with knowledge and resources to become leaders in EE for their communities.
- Codes & Standards: I-REN C&S trainings educate public and private sector building professionals to increase high-quality code compliant EE installations in the region; I-REN C&S technical support services provide tailored, targeted, and on-demand assistance to building professionals to increase their knowledge and ability to perform their jobs in compliance with the building energy code.
- Workforce Education & Training: In its WE&T programs I-REN fosters partnerships to develop new training opportunities and encourage greater awareness of EE benefits and careers with a comprehensive "cradle to career" approach that educates youth, new graduates, and workers looking to upskill and advance their careers.

[42] Initial Memo: Recommendations by the CAEECC Equity Advisory Committee Prepared for CAEECC | December 19, 2025 | Facilitated by Common Spark Consulting, CAEECC Facilitation Team

As regional agencies, RENs are specifically designed to reach, upskill, and grow members of the energy efficiency workforce that would otherwise be left out of the energy transition, filling gaps in offerings from other providers. This includes building up new members of the workforce in areas with lower contractor availability and participation. In remote areas of the I-REN service territory, there is a limited pool of local, trained contractors, and trained contractors must often be brought in from outside the region to complete energy efficiency and electrification projects. Additionally, for contractors who are looking to expand their skills, the pathways for obtaining additional certifications can be complicated, costly, and limited by timing or distance.

With its member agencies' existing networks of contractors and training providers, I-REN is positioned to help bridge the gap between the energy industry and the workforce with its no-cost workforce education programs. I-REN is building partnerships with local community colleges, California State University, University of California and local workforce investment boards to establish a comprehensive network of WE&T offerings. This ensures that I-REN can tailor content to be relevant to the region's needs while growing the network of available contractors in the region.

Recently I-REN was encouraged by Energy Division to coordinate its WE&T programs with the ESA program's contractor network to address the lack of locally-based ESA contractors in the region. As part of its existing WE&T program partnership-building efforts and the BPA development process, I-REN is actively working to establish those coordination practices now, and proposes to continue pursuing this coordinated approach in 2028 and beyond during the new EE and ESA program cycles.

I-REN is meeting with ESA program partners to develop a workforce pathway that would offer on-the-job resources and no-cost training, as well as improved knowledge of the program from cradle to career. This coordinated approach

leverages I-REN's existing workforce partnerships and program framework and the existing ESA program framework, rather than creating a duplicative program. Through these coordinated efforts, I-REN intends to expand the contractor pool for ESA projects, with the multilayered benefits of providing local EE workforce opportunities and increasing ESA benefits to IE residents.

The recent 3/2/26 Low-Income Oversight Board (LIOB) recommendations regarding the Scoping Memo for the Next CARE/FERA/ESA Program Cycle Proceeding offer close alignment with the approaches I-REN is exploring, including local government coordination for outreach to tribal areas, and focusing on ESA workforce retention. See Chapter 7 for a detailed description of I-REN's alignment with the LIOB recommendations.

As part of its workforce development offering, I-REN offers an Energy Fellowship that places Fellows at public sector agencies to implement energy efficiency, resiliency, and climate action plan-related activities within I-REN jurisdictions. Interest in this offering is growing, with increased applications from potential fellows and host agencies between 2024-2025. For 2025-2026 I-REN has placed 24 fellows at local jurisdictions for an 11-month term and is adding a new partial-term cohort option for 8-month placements due to increasing interest in recent months, resulting in the placement of 32 fellows into public agencies through 2025-2026. This additional fellowship provides underserved public agencies with additional capacity to complete EE installations and projects in their communities.

Table 9: I-REN Energy Fellowships

Fellowship Growth 2023-2026	Sample Projects
1st Cycle – 2023/2024 • 11 Fellows @ 11 host sites	Energy benchmarking, Facility audits

Fellowship Growth 2023-2026	Sample Projects
2nd Cycle – 2024/2025 • 13 fellows @ 12 host sites 3rd Cycle – 2025/2026 • 24 fellows @ 16 host sites • 8 (8-month fellows) - 10 host sites	Identify and analyze Energy Efficiency projects Climate Action Plans or Energy Action Plans Capital Improvement Plans or Facility Equipment Replacement Plans

Local building departments are also important to increasing energy efficiency through improved code implementation and enforcement. Yet these individuals face significant barriers in the performance of their jobs: a constantly changing and often confusing set of requirements to be enforced, coupled with limited time and staff resources. I-REN's cross cutting Codes and Standards and Workforce Education and Training programs address this issue in the region by providing workforce education and training to local staff to increase code compliance and safe installation of appliances, including more up-to-date energy efficient appliances.

Through these initiatives, I-REN will work to ensure there is a trained workforce in San Bernardino and Riverside counties to support and realize energy efficiency savings goals for the residential and commercial markets. I-REN's initiatives will further the goals of building workforce capacity for energy efficiency efforts and empower contractors with the technical knowledge needed to effectively complete energy efficiency projects.

Policy Recommendation

I-REN has experienced ongoing challenges with moving EE installations forward due to CPUC's workforce standards for non-residential projects. Having considered the original intent of the standards and recent evaluation data regarding standards implementation, I-REN recommends examining certain questions and issues related to these standards, with the goal of addressing barriers to project progress while also increasing availability of trained contractors in its region who can meet workforce standards. Please see Chapter 11 for details.

10. Propose your preferred approach to regular reporting of demographic energy efficiency program participation information, as required by D.23-06-055 (OP 23).

I-REN plans to utilize indirect data collection for most of its programs, as it is considered less invasive; more personal data may be expected less frequently. This aligns with the CAEECC Equity Advisory Committee's Initial Memo guidance around streamlining eligibility to reduce participant burdens and advance equitable outcomes. I-REN's Codes and Standards Program collects region/address, language, homeowner/renter, household size, and household income. I-REN's WE&T Program collects region/address. I-REN will plan to collect homeowner/renter status, household size, household income, and language for its market support and equity segment programs. I-REN plans to report this data on the California Energy Data and Reporting System (CEDARS), and suggests that these demographics be reported in line with the reporting timeline for the equity and market support indicators reporting on a quarterly basis.

11. Overcome sector and segment specific challenges (e.g., market support, equity, residential, multifamily, industrial, etc.)

Public

Currently, 83% of the project sites participating in I-REN's public sector NMEC program serve equity customers;[43] thus, efforts to address public sector program challenges improve equity outcomes in these jurisdictions.

Table 10: Public Sector Equity Segment Challenges & Solutions

Challenge	Solution
Local government staff lack the time and capacity to pursue complex energy efficiency projects.	Technical assistance, locally focused resources, and person-to-person support are needed to develop and implement strategic energy plans for the Public Sector. I-REN's Strategic Energy Planning program provides direct, person-to-person comprehensive technical services and support.
There are a variety of EE programs and funding sources but it's unclear where to find information or how to participate.	Tailored, locally focused program options, as well as technical assistance and resources, will help prompt participation in I-REN and other PA programs. Strategic Energy Planning Program deliverables outline available funding sources to support implementation of energy efficiency and IDSM measures identified and also provides, as needed, application support to secure these resources. I-REN's forthcoming incentive finder tool will provide a resource for local leaders to increase awareness in their communities of EE funding sources and program opportunities.
There is confusion around process for EE and IDSM upgrades	I-REN works with agencies to provide tailored support including energy plans that analyze the most efficient and effective upgrades and future upgrades. I-REN provides dedicated one-on-one staff support to guide public agencies from process start to finish to reduce confusion and streamline services and reduce confusion.

43 Per CPUC Equity Segment Geographic Definition

Challenge	Solution
There is a lack of start-up/ seed funding for projects	I-REN will promote innovative ways to find funding, including philanthropic funds that can support jurisdictions. Through I-REN's comprehensive concierge support services, it helps public agencies with capital planning to allocate funding to energy efficiency projects. The Strategic Energy Planning program identifies all available incentive opportunities to reduce out-of-pocket costs. It also identifies low-cost opportunities, such as operational and retro-commissioning measures, which are less costly but lead to significant savings. The NMEC program delivers incentives, improving project affordability.
Navigating EE program participation and funding sources is complex and requires a dedicated "Energy Champion" who can devote time and attention to the subject.	Person-to-person technical assistance and support is critical for maintaining relationships through staffing turnover. I-REN's Strategic Energy Planning program provides direct, person-to-person support, while I-REN's Building Upgrade Concierge Program reduces the complexity of navigating building upgrades. I-REN fellows serve as energy champions who move projects along and lay a strong foundation for future implementation.
Jurisdictions must reduce emissions by electrifying their vehicle fleet, but do not have trained technicians or resources to do so.	I-REN's WE&T program will expand offerings to include training on EV charging infrastructure and EV upgrades. In coordination with these trainings, I-REN's Public Sector program will include EV charger measure identification and analyses through technical assistance as well as grant support for EV charger incentives and grants.
Due to budgetary restrictions and complicated approval processes, public sector agencies may wait until burnout to replace equipment. At that time, they are forced to decide quickly, often without access to outside funding sources.	Strategic energy planning helps to create a roadmap to plan for equipment upgrades. Technical assistance and locally focused programs can help agencies leverage resource programs and secure funding and financing to reduce costs.
Local governments	Technical assistance resources and person-to-person

Challenge	Solution
each have their own bureaucratic structure, and it's often unclear how they can enroll in EE programs or apply for financing opportunities.	support help agency staff navigate the enrollment and approval process. I-REN's dedicated concierge support helps to bring in the right decision makers at the right time to navigate the energy program landscape and get to "yes" on pursuing and funding projects.

Workforce Education & Training

Table 11: WE&T (Cross-Cutting) Market Support Segment Challenges & Solutions

Challenge	Solution
There is a lack of awareness and interest in energy efficiency job pathways.	Utilize social media as an outreach tool to increase awareness of energy efficiency careers for youth. Emphasize public health benefits to raise interest in EE and reduce the stigma of trade school.
With uncertainty around federal funding cuts, employers are less likely to hire new trained professionals.	Focus offerings on upskilling existing workforce.
Contractors aren't aware of energy efficiency projects, or they cannot or choose not to perform this work.	Foster connections between workforce and industry. Promote relevant training opportunities to upskill the workforce. Collaborate with employers to provide continuing education for professional development and employee retention. Equity connection: Conduct trainings in Spanish to increase awareness for a broader suite of contractors and potential contractors.
When employers are hiring for skilled positions in advanced energy and energy efficiency, they can't find people to hire.	Foster connections between workforce and industry. Promote relevant training opportunities in collaboration with WIBs to upskill the workforce. Collaborate with employers to provide continuing education for professional development and employee retention.

Challenge	Solution
	Equity connection: Conduct trainings in Spanish to increase awareness for a broader suite of contractors and potential contractors.
Codes and standards compliance and energy efficiency programs require certain certifications and qualifications for builders to participate.	Promote relevant training opportunities in collaboration with WIBs to upskill the workforce. Collaborate with employers to provide continuing education for professional development and employee retention Equity connection: Conduct trainings in Spanish to increase awareness for a broader suite of contractors and potential contractors.
Energy efficiency and advanced energy projects and programs require qualifications that the local workforce does not have.	Foster connections between workforce and industry. Promote relevant training opportunities in collaboration with WIBs to upskill the workforce. Equity connection: Conduct trainings in Spanish to increase awareness for a broader suite of contractors and potential contractors.
Training is too far away and is offered infrequently or scheduled during work hours. Training opportunities when it's inconvenient for contractors to attend. Also, existing training may be irrelevant to contractors or local projects' needs.	Promote relevant training opportunities to upskill the workforce. Collaborate with employers to provide continuing education for professional development and employee retention. Equity connection: Increase accessibility of trainings by increasing the number of sites and delivery mechanisms and more options for timing
There is a lack of professionals able to provide energy efficiency upgrades to larger businesses and commercial properties in the commercial sector.	I-REN will expand to train contractors to work on larger commercial systems enabling larger warehouses and industrial spaces to reduce emissions

Codes & Standards

Table 12: C&S Sector and Segment Challenges and Solutions

Challenge	Solution
Codes and standards have been rapidly updated in previous years.	Cross-cutting public sector and Technical Assistance program provides tools, training, and resources to help local building department staff and permit applicants get up to speed on changes to codes and standards from the past code cycles. A rotating energy specialist can visit jurisdictions to help answer code questions. Third party plan checkers support agencies in checking code compliance for planning documents.
Contractors do not know the differences in code requirements by jurisdiction.	I-REN will offer a regional approach to trainings while highlighting the nuances and differences between areas. I-REN's Ask an Energy Code Question service provides energy code experts for 1:1 support. I-REN also provides a regularly updated online resource hub of on-demand, downloadable references.
Many contractors are unable to effectively implement all energy code requirements from trainings.	I-REN will offer in-person, hands-on training and forums to provide deeper understanding of code requirements. Equity connection: Conduct trainings in Spanish to increase awareness for a broader suite of contractors and potential contractors.
There is a lack of contractors who can complete electrification projects.	I-REN offers training on electrification of heat pump water heaters and heat pumps. Equity connection: Conduct trainings in Spanish to increase awareness for a broader suite of contractors and potential contractors.
Some local building departments have limited staff resources and capacity for enforcing energy codes.	Ongoing training and outreach can help identify and fill gaps in building department capacity, while reinforcing the importance of energy codes and helping encourage local leadership in EE and C&S.

Challenge	Solution
Both permit applicants (e.g., construction firms) and local building department staff have complicated requirements to follow for compliance and enforcement.	Technical assistance can help provide targeted support for permit applicants and local building departments, and other tools, and resources can offer accessible information to answer frequently asked questions and help address known issues.

12. Promote responsible management and disposal of removed refrigerant and incorporate low-GWP refrigerants/ultra-low GWP refrigerants

While GHGs from appliances such as gas furnaces and stoves are generally understood to be large contributors to climate change, the GHG impact of refrigerants is a relatively recent focus of PA programs. Replacing standard refrigerants with low-GWP alternatives can be an expensive process, one that larger commercial energy customers can make more easily with more upfront cost. The role of RENs is to work with small to medium businesses to ensure these local entities can take part in the energy transition.

There remains a gap in experienced workforce to remove refrigerants and ensure proper disposal. While the RENs can connect with businesses to get them interested in refrigerant replacements, the lack of workforce in this area means that it is challenging for these projects to occur and to scale.

I-REN's programs currently do not focus on low or ultra-low GWP refrigerants. However, there is an opportunity to expand WE&T program training to include training switching from high to low-GWP refrigerants. This would allow contractors to work with commercial kitchens in the public sector and small grocers to replace refrigerants. Additionally, for I-REN's Public Sector programs, agencies are showing a growing preference for equipment that uses low-GWP refrigerants. I-REN will explore a targeted initiative to offer enhanced incentives for measures that incorporate low- and ultra-low-GWP refrigerants into NMEC projects. Such enhanced incentive offerings could support accelerated adoption of low-GWP technologies, helping

overcome first-cost barriers while maximizing total emissions reductions. This aligns with broader decarbonization and climate goals across the Public Sector.

13. Spur innovation to advance a technology, marketing strategy, or delivery approach in a manner different from previous efforts in your EE portfolios

Since its approval as a REN in 2021, I-REN has been building relationships with member agencies, special districts, and energy organizations throughout the region. Despite these relationships, the Inland Empire includes many equity communities and the region itself still has low engagement and low capacity, which has resulted in slow program uptake. These were key findings from I-REN's stakeholder engagement and EM&V studies in 2025 as described in Chapter 8. To address this and increase program uptake, I-REN plans to update its marketing and outreach strategy in the next phase, the elements of which are outlined below.

There is an overall need to better align messaging and marketing materials for I-REN customers, reflected in the stakeholder input that informs I-REN's BPA (See Chapter 8). Energy efficiency is not a high priority in the region; rather, to increase the number of contractors interested in training programs, workforce education and training materials should focus on public health benefits and the importance of improving health outcomes. Increasing awareness of I-REN's services will also include benefits to public health.

There is also a continued need to grow the energy efficiency workforce in the Inland Empire and to get young people involved in energy efficiency careers. Based on stakeholder engagement findings, I-REN will increase social media outreach for its programs, based on stakeholder input, with messages tailored to youth to increase their interest and engagement in energy efficiency career paths.

In parallel, participants also suggested tailoring messaging and outreach methods to older audiences. A large portion of business owners, or potential employers, tend to be part of an older population and may be accustomed to traditional and physical outreach methods. The current focus is on online trainings, virtual outreach,

and word-of-mouth recommendations. To better reach some of the older audiences, I-REN should consider in-person trainings and physical outreach including meetings, newsletters, and phone calls to meet people where they are. This may also help reach second chance populations who are changing careers later in life. It is important to build relationships with these audiences and increase the training offerings to the clean energy career pipeline.

As part of its Codes and Standards programs, I-REN will continue to cater its trainings for contractors and other building professionals. I-REN's C&S team will increase and improve its outreach to its jurisdictions through more frequent in-person visits to increase the number of contractors engaged with I-REN's programs. I-REN will research and develop a master list of third-party permitting and plan checking services used by jurisdictions that can be engaged in code compliance offerings. Keeping track of permitting and plan check services will allow I-REN to identify ways specific to building departments within I-REN's regions to increase code compliance.

I-REN's C&S trainings will build on its innovative efforts to reach Spanish speaking individuals by continuing its live Spanish-simulcast Energy Code trainings. I-REN's C&S trainings will also focus on code requirements surrounding appliance installation, ensuring that contractors stay up-to-date with compliance, including learning how to properly install new appliances. I-REN recognizes the importance of certifications for building professionals within its region and will develop opportunities for certifications including: Energy Code Compliance Rate, Certified Energy Analyst, Certified Building Official, Plan Examiners, and related International Codes Council certifications.

Additionally, for I-REN's public sector programs, there is a need to better demonstrate the type of projects that public agencies could be involved with and how they would work with I-REN to complete these projects. As I-REN's first round of NMEC projects complete, I-REN plans to develop and market case studies from

past projects to promote the benefits and attract potential new projects for public agencies.

14. All PAs: Incorporate community-based program design in relevant existing and planned EE programs that promote meaningful community involvement, advances equity, and ESJ Action Plan goals (D.23-06-055, OP 31)

California's RENs incorporate community-based program design in several aspects of their energy efficiency offerings, and I-REN centers community involvement by engaging local partners, gathering continuous feedback, and tailoring programs to the real conditions and needs of the Inland Empire. This aligns closely with CPUC's ESJ Action Plan goals focused on equity, access, and meaningful participation.

I-REN's Community Outreach & Engagement work is built around listening first. The program includes community roundtables, partner check-ins, local events, and ongoing engagement with past participants. I-REN uses these conversations to understand barriers, motivators, and regional priorities. I-REN collaborates with trusted messengers, including local governments, nonprofits, and community-serving institutions, to ensure program design reflects local experience and priorities.

To better reach hard-to-reach and underserved communities, I-REN emphasizes culturally relevant communication, multilingual materials, and clear program information. I-REN also understands the sensitivity of divulging personally identifiable information for many of its communities and is willing to tailor support to these communities without requiring their personal information. These practices reduce participation barriers and help customers make informed choices about energy upgrades, directly supporting ESJ goals around equitable access and representation.

I-REN's Workforce Education & Training (WE&T) Program is a strong example of community-driven design in practice. The program works closely with regional workforce and economic development partners, educational institutions - including

all 12 community colleges - both Riverside and San Bernardino County workforce boards, youth-serving programs such as Youth Action Project, regional economic development organizations like Inland Empire Growth & Opportunity, energy employer and training providers and trades groups like the Inland Empire Labor Institute. These partnerships help WE&T program administrators understand what job seekers need to enter the clean energy workforce. Through hands-on workshops, career awareness events, trainee surveys, and employer feedback, I-REN continually refines training content, delivery methods, and support services.

The WE&T program intentionally reaches participants who have historically lacked access to clean energy career pathways, and provides clear, supportive guidance to help them build confidence and prepare for high-road jobs. These efforts directly advance ESJ Action Plan goals related to workforce inclusion and equitable economic opportunity.

In 2026, the City of Corona participated in the I-REN Energy Fellowship and has experienced, first hand, the opportunity to increase capacity to meaningfully support the City's energy initiatives:

"The IREN Fellows have been an instrumental extension of our Economic Development efforts, providing meaningful support in strengthening our engagement with the local business community. Through their work, the Fellows helped facilitate conversations with existing businesses to better understand barriers to entry and growth. Their research and outreach helped our team explore practical incentive strategies that could help offset startup expenses and improve the overall ease of doing business. Beyond the research, the Fellows brought a thoughtful, solutions-oriented perspective to the process—translating feedback from the business community into actionable insights that can inform future economic development programs. Their contributions have helped advance our efforts to create a more supportive environment for business formation and

investment, and we are grateful for the energy, professionalism, and analytical support they have brought to our city." – City of Corona representative

Community Input Across I-REN Programs

In addition to the Workforce Education Program listed above, I-REN uses similar community-informed processes across its portfolio.

- Public Sector Program: I-REN works directly with cities, counties, special districts, and community-serving entities to identify shared challenges, co-design program improvements, and align support with local capacity.
- Codes & Standards Program: I-REN engages inspectors, planners, and building professionals to identify training needs and deliver resources that are accessible and relevant to practitioners across the region.

IV. Chapter 4: Forecast Methodology and Zero-Based Budgeting

A. Demonstration of the reasonableness of request

Budget Overview

Per CPUC guidance in D.19-12-02, RENs are not required to meet a specific cost-effectiveness threshold as their portfolios are designed to fill gaps and serve HTR customers that require additional support to make headway in the EE market, and therefore their program offerings are likely to be naturally less cost-effective than the larger portfolios of the utilities.[44] REN budgets may be reasonably assessed in alignment with this guidance, with special consideration for REN plans to serve hard-to-reach customers.[45] This context serves as the regulatory basis for I-REN's budget request.

The budget request reflects a bottom-up assessment of staffing labor, expenses, implementation needs, and evaluation requirements. While I-REN will maintain the same sectors, segments, and overall program structure, it is looking to expand upon previous program successes and expand program activities. These additional activities and anticipated program growth are reflected in the portfolio budget, which incorporates all projected costs. In total, the 2028-2031 I-REN portfolio budget request totals to $78,162,177. These activities and budgeting methodology are expanded upon below.

Sector and Segment Level Budget Methodology

I-REN's portfolio is comprised of six programs, which are evenly subdivided between three segments and three sectors.

It includes two programs, which align with the cross-cutting Workforce Education and Training Sector. These two programs also align with the Market Support

[44] D.19-12-021 Finding of Fact 10.
[45] D.19-12-021 at 39.

segment. The result is a set of programs which are focused on building workforce capacity and expertise to improve the long-term success of the Inland Empire's EE market.

I-REN's two Public Sector programs align with the Equity segment. Both programs are focused on improving the EE performance of public facilities and improving EE knowledge and capacity for Public Sector staff. In a region that has historically had chronic equity challenges, this kind of investment in the public sector improves the resilience of entire communities.

Codes and Standards functions both as a sector and a segment, and I-REN's two C&S programs provide cross-cutting support which address needs for both the Inland Empire's public sector and its workforce. Distinct from IOU-administered C&S programs, I-REN's C&S programs are focused on compliance and education within a region that has historically lacked sufficient numbers of building professionals with extensive knowledge of C&S.

For I-REN, sector and segment objectives are aligned. By extension and owing to the equal subdivision of sector and segment goals, cross-sector coordination forms the basis for the effectiveness of I-REN's portfolio. Consequently, the methodologies for forecasting and allocating benefits are the same on both a sector and segment basis for I-REN.

The main factors driving strategic budget increases across I-REN sectors and segments for the BPA are summarized below.

- Workforce Education & Training (WE&T) – Market support
    - I-REN Energy Fellowships have grown significantly year after year since program launch and play an important role in supporting public sector project development, and in order to build upon that success, I-REN anticipates doubling the number of fellows by 2031.

- The Riverside and San Bernardino County workforce development partnerships are expected to grow over the 8-year horizon of the BPA, aligned with stakeholder input and I-REN workforce assessment research indicating a need for enhancing workforce support to the region.
- I-REN will continue its outreach and partnerships with local career fairs and education pipelines to continue developing and improving a pathway for the training of a local clean energy workforce.
- Based on guidance provided by CPUC Energy Division staff, I-REN will explore how its workforce efforts can support contractor enrollment in the utility-run low-income Energy Savings Assistance Programs, creating an additional direct link between I-REN workforce and energy efficiency installations benefiting underserved customers.

- Codes & Standards (C&S)
  - Trainings offered by I-REN's team are expected to increase, along with Spanish-language simulcasts. I-REN also plans to launch a learning management system to make trainings available online and track participation metrics. I-REN will also explore cross-cutting training opportunities between C&S and WE&T using I-REN's established C&S training platform. In response to requests from local jurisdictions and I-REN Executive Committee members, I-REN plans to begin offering support to local jurisdictions to develop local electrification plans in order to comply with AB 39.
- Public Sector - Equity

- Stakeholders have indicated that public sector technical support continues to be necessary to support NMEC project development and will be crucial for ensuring that public sector agencies can complete projects and receive incentives. I-REN proposes to increase the technical support budget to enable more NMEC projects to occur.
- As I-REN's only resource program, Cash for Kilowatts provides energy savings for public facilities using the NMEC framework. Additional details outlining the forecasting methodology for this program are provided below.

1. Cash for Kilowatts

Several factors contribute to the electric savings forecast for Cash for Kilowatts, including public agency uptake of I-REN offerings, typical public agency project timelines, agency capacity and resources, expected project sizes, and external impacts such as tariffs and reductions in federal funding. The gas savings forecast is driven by the limited availability of SoCalGas gas interval data and challenges in meeting NMEC modeling requirements.

In updating the NMEC program's methodology, a combined 2026–2027 incentive-per-project rate was developed, along with the percentage allocation between lighting and whole-building project types. Total energy savings were then divided by total incentive dollars to establish a savings rate. These rates were applied to the 2028–2031 program years using the BPA incentive budget.

The anticipated number of projects per year was calculated by applying a 3% inflation rate to the incentive-per-project rate and dividing the result by each year's incentive budget. Total projects were then allocated by project type. Total energy savings were calculated by multiplying the annual incentive budget by the savings rate and escalation rate, and lighting and whole-building multipliers were applied to estimate energy savings by project type.

B. Program Modifications from 2024-2027 portfolio cycle

I-REN will not be modifying any programs for the new 2028-2031 program cycle.

Table 11: Closed Programs from the 2024-2027 Cycle

Name of Closed Program	Segment	Sector	Unspent Budget of the Closed Program	Total EE budget from the 2024-2027 cycle	Rationale for Program Closure	Underperformance and Remediation
N/A	N/A	N/A	N/A	N/A	N/A	N/A

Table 13: New Programs in 2028-2032 Application Cycle

Name of New Program/Placeholder Program	Segment	Sector	High Level Program Description/Purpose
N/A	N/A	N/A	N/A

C. Methodologies and calculations used to derive a zero-based budget

Each program budget reflects forecasted program activities, rather than historical spending levels. Resources were prioritized for programs where there were opportunities to build upon proven success.

I-REN started by estimating each REN partner's forecasted staffing levels and associated labor costs, based on expected program activities. From there, non-labor costs were forecasted by the REN's management team, based on past expenditures, current contracts, and additional areas for growth.

After labor and non-labor costs were forecasted for each program for 2028-31, the full portfolio budget was reviewed to ensure all additional activities were accounted for and all cost assumptions were reasonable. During this review, I-REN examined the proportionality of its portfolio budget request to that of both IOUs

that serve its territory, while also considering the HTR populations that it seeks to serve. Forecasted expenses were adjusted as appropriate, and once the annual budgets were finalized for 2028-2031, a cost-of-living adjustment of 4% per year was applied for the remaining years in the cycle.

D. IOU Budget Splits

I-REN does not have fuel substitution work proposed at this time, and therefore in the BPA workbook in Sheet 3.1, Cells 18-25D the budget amounts are zero. The percent of IOU budgets are applied using previously determined splits of 77.5% for SCE (all electric funding) and 22.5% for SoCalGas (all gas funding).

V. Chapter 5: Portfolio Management

A. Overview for 4-year plan and 8-year plan: Key metrics and outcomes

1. BPA Alignment with Goals

I-REN's vision is to connect residents, businesses, and local government to a wide range of energy efficiency resources to increase energy savings and equitable access throughout San Bernardino and Riverside counties. The overarching goals guiding I-REN's portfolio are shown below.

Table 14: I-REN EE Portfolio Goals

Goal 1	Goal 2	Goal 3
Build capacity and knowledge to enable local governments to effectively leverage energy efficiency services and to demonstrate best practices.	Ensure there is a trained workforce to support and realize energy efficiency savings goals across sectors.	Work closely with local building departments and the building industry to support, train, and enable long-term streamlining of energy code compliance.

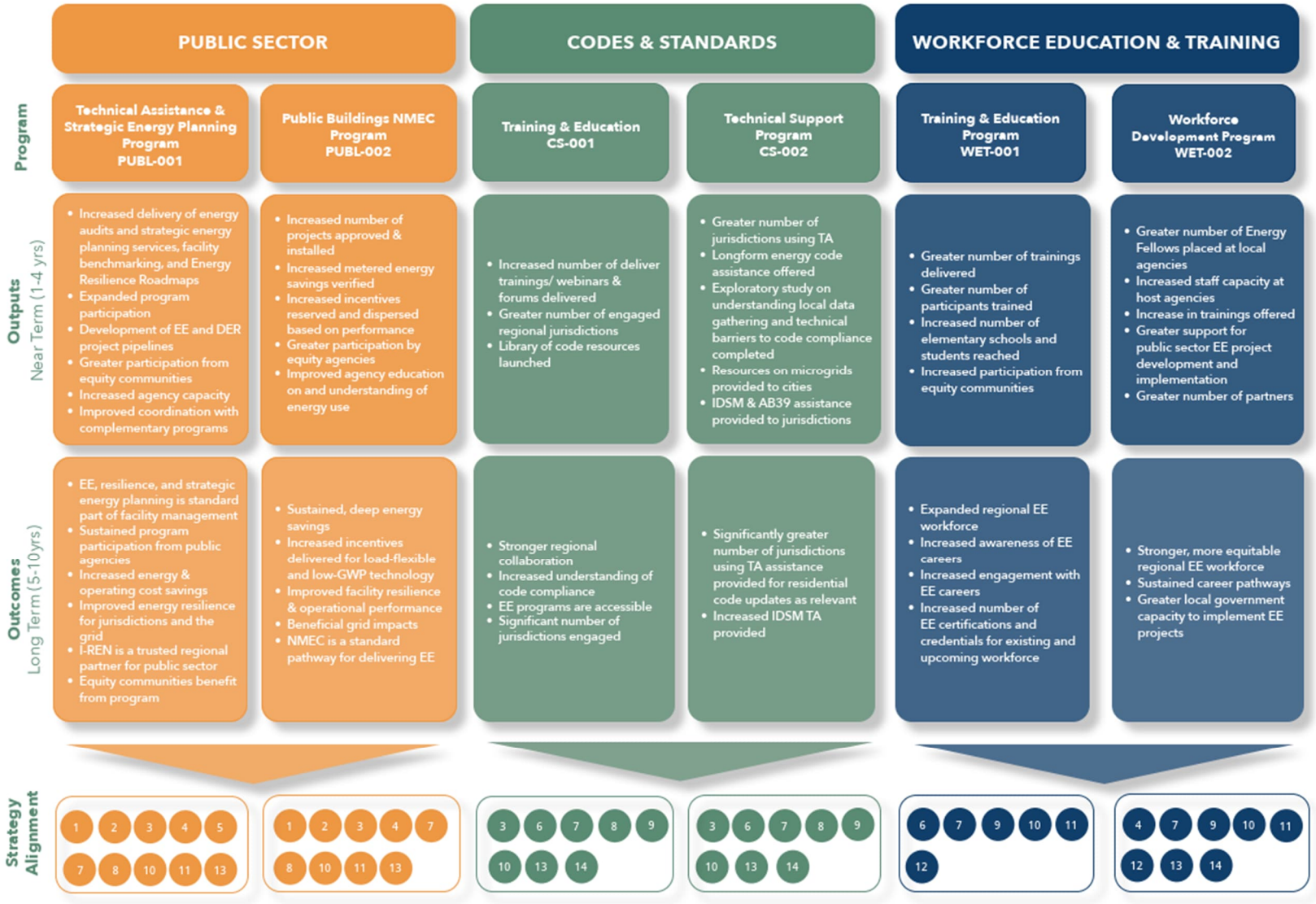
These goals are restated in the Segmentation and Sector Strategy section of this application, along with the outcomes which signify goal achievement. Both in the near term (2028-2031) and in the long term (2032-2035), I-REN will continue to develop a cohesive portfolio and further develop the data gathering and EM&V processes necessary to ensure progress. The portfolio-level logic model presented in the section that follows shows the connections between I-REN's programs, overall goals, and CPUC portfolio strategies.

I-REN's Unique Value Metrics (UVMs) play a significant role in measuring success. Originally tracking three UVMs, one per sector, I-REN has taken a measured approach to ensure that its unique value streams and data flows are established such that these activities are trackable for UVMs. As I-REN's offerings have advanced, I-REN is proposing two new UVMs for the C&S and WE&T sectors. I-REN will continue to iterate on its slate of UVMs, both in response to the development of its portfolio as well as the changing expectations set upon RENs and PAs generally.

1. Portfolio-Level Logic Model

The logic model that follows presents I-REN's portfolio and the inputs and activities necessary to deliver outcomes aligned with I-REN's accountability mechanisms and overall goals.

Figure 27: I-REN Portfolio Logic Model



2. *I-REN Unique Value Metrics*

In its current 2022-2027 portfolio, I-REN tracks and reports on three UVMs (noted in table as existing UVMs). Early on in I-REN's 2022-2027 portfolio, the Commission conducted an assessment of I-REN's evaluability. This assessment examined I-REN's initial value concepts from its first Business Plan and their connection to I-REN's strategic framework, the process I-REN undertook for evolving its value concepts into UVMs, and the selected UVMs and data collected to date.

In the resulting Draft Inland Regional Energy Network Evaluability Memo,[46] the evaluation team found that I-REN's UVMs demonstrate its core values and are quantifiable and easily understandable. Moreover, the evaluation team recommended future RENs adopt a similar approach to the process that I-REN took to develop its value concepts into measurable UVMs, by aligning UVMs with core REN values, distinguishing the UVMs from other existing metrics, and proposing a limited initial set of UVMs that can grow over time as needed.

Now, three years later, I-REN proposes two new UVMs tailored specifically to needs in its communities. Overall, I-REN's offering of UVMs represents an approach that is designed around local needs. Each metric is linked to I-REN's strategic framework, focusing on building local government expertise, developing local workforce capacity, and designing tools and resources around I-REN's unique communities.

Increases in the tracked numbers or values of these metrics should tell a complementary story of cross-sector collaboration among I-REN programs and segments. Greater participation from energy fellows can be correlated with greater adoption of technical assistance tools. For the newly proposed metrics, increased participation in Spanish speaking communities goes hand in hand with kindling an interest in EE work at schools; it tells a story of a region engaging on

[46] *California Public Utilities Commission Draft Inland Regional Energy Network Evaluability Memo. CPUC Deliverable 22: Year 4 Evaluation of RENs.* Opinion Dynamics, Tierra Resource Consultants. October 27, 2023.

energy efficiency at all levels and among all members of the community, to increase equity as well as build and support sustainable markets for EE.

The table below clearly identifies the UVMs I-REN will use in the upcoming portfolio cycle, including what the metric is measuring, how I-REN will track and report on it, and why this metric reflects a unique value or contribution.

Table 15: UVM Overview and Reporting Approaches

Unique Value Metric (UVM)	Description of What It Measures	Tracking & Reporting Approach including targets where applicable	Strategic Importance to I-REN Portfolio
Existing UVM: Percentage of partner jurisdictions that use I-REN guides and tools for code compliance	Measures partner jurisdiction usage of I-REN developed guides and tools to facilitate in code compliance	Numerator: # of jurisdictions that either request a guide/Reach Codes help/TA help from I-REN Denominator: # of code jurisdictions	Demonstrates effectiveness of I-REN C&S programs in reaching partner jurisdictions; these relationships are crucial for moving the region toward increased code compliance
Existing UVM: Number of BUC registrations in partner jurisdictions (total users)	Measures the number of registrations into I-REN's Building Upgrade Concierge (BUC) across I-REN partner jurisdictions.	Count of agency portfolios created in BUC	Demonstrates overall usage of I-REN's BUC tool, which supports in expanding technical assistance and identifying opportunities for TSB and energy savings to reduce public sector ratepayers' energy bills
Existing UVM: Number of fellows placed within partner jurisdictions	I-REN's Energy Fellowship workforce initiative provides job opportunities and experiential energy education to participants who are placed at local jurisdictions to support energy projects.	Collected from Program data	Energy Fellows are local champions for energy efficiency in I-REN territory and support capacity of local agencies to take on energy efficiency and resiliency projects, including I-REN NMEC projects delivering TSB and bill savings

Unique Value Metric (UVM)	Description of What It Measures	Tracking & Reporting Approach including targets where applicable	Strategic Importance to I-REN Portfolio
New UVM: Percentage of C&S trainings offered in Spanish language	Number of C&S trainings offered in Spanish language vs. Number of C&S trainings per year	Numerator: Number of C&S trainings offered by I-REN in the Spanish language Denominator: Tracking number of C&S trainings offered by I-REN Tracked per quarter, rolled up annually	There is a high density of Spanish speakers within I-REN's territory and the local building industry, demonstrating language barrier. I-REN will overcome equity barriers, advance ESJ goals, and reach more participants with Spanish language offerings
New UVM: Count of school participants for WE&T projects; Count of student participants for WE&T projects	Number of schools participating in I-REN K-12 EE education projects; Number of students participating in I-REN K-12 EE education projects	Track the number of schools that participate in I-REN K-12 EE education projects; Track the number of students that participate in I-REN K-12 EE education projects; report both per quarter then roll up annually	Based on I-REN's Workforce Gap Assessment, projections show more than 75% of workers in critical energy-related roles may retire or transfer by 2030, highlighting the need for immediate recruitment and retention strategies—especially given the growth of the IE region. I-REN's solution to this assessment: recruit youth participants to encourage greater awareness and interest in EE jobs

B. Strategies to optimize portfolio and manage risk

1. Use of Goals & Metrics to Maximize Portfolio Performance

For I-REN's portfolio of equity, market support, and codes and standards programs, TSB and cost-effectiveness are one component among multiple performance metrics that I-REN utilizes to monitor and maximize impacts of its offerings.

REN PAs do not have top-down TSB goals or cost-effectiveness requirements set by the CPUC due to the threshold criteria their programs and activities must meet.[47] Currently the Commission's Potential and Goals Study process is conducted at the IOU service territory level and resulting decisions do not set goals for non-IOU PAs. Instead, REN PAs develop bottom-up forecasts of expected portfolio performance to submit with their applications, in alignment with D.21-05-031, and may propose to revise their goals and savings forecast in the true-up or mid-cycle advice letters (TUAL or MCAL) in accordance with D.21-09-037.

As a REN PA, I-REN establishes its own TSB goals, which have undergone re-evaluations and reforecasting exercises through the TUAL and MCAL processes, based on historic program performance. I-REN's equity segment Public Sector NMEC program, for example, provides energy savings as I-REN's only resource program. PA and Implementation staff recently re-forecasted energy savings goals in the MCAL in response to market and operational barriers, and have used that approach to inform the TSB and cost-effectiveness forecasting process for this BPA.

I-REN tracks its program and portfolio-wide progress using accountability mechanisms including the following:

- TSB, expenditures, and other cost-effectiveness inputs and outputs as required for monthly, quarterly, and annual reporting

[47] D.19-12-021 OP 4.

- Other savings and participation "common metrics" in alignment with Resolution E-5351, gathered on a monthly and quarterly basis from program teams by the portfolio administration team for ongoing performance tracking, and aggregated for annual reporting
- I-REN unique value metrics, gathered on a monthly and quarterly basis from program teams by the portfolio administration team for ongoing performance tracking, and aggregated for annual reporting
    - As described earlier in this chapter, I-REN's UVMs are directly linked to and reflective of progress toward I-REN's overarching goals for public sector, WE&T, and C&S
- Equity and market support indicators in alignment with Resolution E-5351, gathered on a monthly and quarterly basis from program teams by the portfolio administration team for ongoing performance tracking, and aggregated for annual reporting
- Non-CPUC key performance indicators (KPIs) internal to I-REN; examples include but are not limited to the following:
    - kWh and therm savings potential identified through public sector technical assistance
    - Public sector projects referred to other PAs
    - Non-ratepayer funding, e.g., grants, obtained for local agency energy projects through I-REN technical assistance
    - C&S training participant satisfaction scores
    - C&S training and event conversion ratios from registration to attendance
    - Outreach email open rates and click-through percentages

2. Approach to Managing Underperformance Risks

I-REN governance structure is a key accountability mechanism for identifying, surfacing, and addressing performance issues. The member COGs who make up I-REN are individually accountable to their committees and leadership, and collectively the COGs as I-REN are accountable to the I-REN Executive Committee. The I-REN Executive Committee in turn is comprised of elected representatives of municipal and county government who are accountable to their constituents and communities.

I-REN utilizes program tracking tools and databases to monitor the metrics and internal KPIs referenced above. Underperformance is identified in a timely manner as a standing item in program team and portfolio administration meetings, and program teams collaborate with implementers and other partners to identify potential solutions. Performance issues and solutions are then communicated transparently through Brown Act meetings and staff reports to obtain input from the relevant committees and leadership.

The I-REN Executive Committee members can direct I-REN staff to investigate other solutions and return with additional data to inform decision making, or the committee members can suggest their own recommended course of action. Based on the direction of the I-REN Executive Committee, and with leadership from WRCOG as the lead administrative agency, I-REN staff from each COG are responsible for implementing intervention strategies to address performance issues.

Intervention strategies to support program success vary depending on the program and the performance issue, and I-REN strives to retain a flexible approach while operating within the bounds of its committee-based accountability framework. Some recent examples of performance issues and strategic interventions are described below.

The equity and market support challenges that I-REN seeks to overcome with its EE portfolio are persistent, and progress is not always linear. The initial years of I-REN's portfolio were marked by economic turmoil with the COVID-19 pandemic. Local governments and workforce, the main focus of I-REN's portfolio, were significantly and negatively impacted. These pressures unfortunately continue. In January 2026, the SCAG 2025 Southern California Economic Update Riverside and San Bernardino Counties Report gave a worrisome forecast for the years ahead, noting that "[t]he Economic Outlook for the Inland Empire over the next 12 to 18 months is bleak." Recent geopolitical developments in the days and weeks leading up to the submittal of this BPA threaten to make a difficult situation even worse for IE ratepayers who are already facing affordability challenges and high unemployment.

In order to be responsive to the EE needs of its stakeholders, as detailed extensively in Chapter 8, I-REN relies on the flexibility to prioritize local, hands-on approaches and relationship-building. This work takes time and effort and accountability, and therefore is well-suited to I-REN as representatives of local governments. The REN PA framework established by CPUC, in which RENs can focus their efforts on overcoming barriers and creating sustainable EE markets for equity communities, is crucial for iterating and improving program outcomes.

Table 16: I-REN Examples of Strategic Interventions to Improve Program Performance

Performance Issue	Intervention Strategies
Despite very high interest in implementing EE projects in their facilities, public agencies in the I-REN region have continued to struggle mightily to move their projects forward—due to a combination of issues, including staff capacity limitations as a major barrier. This was a significant, known barrier that I-REN specifically planned for in its first business plan. Yet the depth of these challenges has turned out to be even greater than expected and has led to underperformance toward TSB and cost-effectiveness forecasts.	• Reforecasting: through the recent MCAL process, the program team re-forecasted program goals based on program pipeline and realistic expectations about timing to overcome barriers. • Cross-sector coordination: the need to supplement public agency staff capacity has been a driving force to increase I-REN Energy Fellowship opportunities and place more fellows at local agencies to move projects forward. The initial push to increase these efforts has already been successful, as demonstrated in I-REN's 2024 Annual Report, and I-REN plans to continue increasing the number of fellowships available to facilitate this cross-sector collaboration • Resource allocation: in addition to increasing WE&T budget requests in its proposed BPA, I-REN requests additional funding for public sector technical assistance as those services have been heavily relied upon to meet agency support needs and enable NMEC project progress.

Performance Issue	Intervention Strategies
After seeing growth in C&S training participation year over year from 2023 to 2024, in 2025 I-REN's C&S program tracking data began to indicate that regional participation was declining for San Bernardino County while Riverside County participation was increasing, leading to an overall 3% decrease in total program training participation.	• Root cause analysis: I-REN's C&S team analyzed program participation to trace the cause of the San Bernardino County participation decline to staffing changes with the transition between Energy Fellowship cohorts. • Relationship-building: before end of year the C&S team began course correction efforts to re-establish direct lines of communication to drive participation increases. • Outreach innovation: I-REN is working now to develop and implement new tactics for achieving broader audience reach and deepening jurisdiction relationships. These strategies will begin now and are proposed to increase in I-REN's proposed plans for 2028 and beyond.

3. Procurement Practices for Risk Mitigation

Procurement related to the I-REN EE portfolio is overseen by WRCOG as the lead administrative agency and governed by procurement policies adopted by the WRCOG Executive Committee.

I-REN uses a combination of COG staff, third-party consultants and implementation firms, and local/regional community and government partnerships to implement its EE portfolio. One of I-REN's plans for 2028 and beyond is to increase staffing capacity within the governing COGs, to provide additional program oversight. This helps mitigate risk of dependency on third-party consultants and aligns with I-REN's overall goal of regional capacity-building for energy efficiency. This balance of public and private sector EE program support reduces risks associated with overreliance on a single type of program staffing.

I-REN employs mitigation strategies to address potential risks associated with various types of EE program procurement as follows.

- Program TSB and cost-effectiveness forecasts and metrics reporting undergo thorough quality assurance checks by a non-implementing technical and regulatory partner external to day-to-day program delivery.
- Expenditures are monitored according to budget limits, cost categories, and other CPUC EE Policy Manual guidance, within the framework of WRCOG's transparent financial practices as a local government agency. WRCOG reviews invoices and maintains a feedback loop with implementers and other partners regarding allowable costs and adherence to cost category guidance and not-to-exceed budgets.
- Program implementation and regulatory compliance is overseen by WRCOG as the lead administrative agency with the support of COG partner staff and subject to the transparency and accountability inherent to I-REN's

governance structure, as described in prior sections of this chapter and Chapter 2.

C. Third-Party Programs (IOUs only)

Not applicable.

D. Statewide Programs (IOU and BayREN)

Not applicable.

E. Statewide Assessment

PAs recently met to draft a proposal as a part of the D.21-06-055 OP 2 Statewide Energy Efficiency Program Assessment Criteria Working Group. I-REN participated in good faith starting in fall of 2025, after an initial group of IOUs developed the beginning of the PG&E-led proposal starting in summer of 2025. Starting in November 2025, the Working Group's intent was to refine the IOU-developed proposal and consider potential issues which the CPUC would need to address. Some consensus was established through this process, though I-REN, among other PAs, offered only qualified support for the finalized draft proposal, as was communicated at the close of the process in survey responses to PG&E. I-REN's survey response and the resulting assessment is attached in Exhibit 4.

An important part of the conversation focused on how or whether local programs would be upscaled to larger statewide programs, and vice versa. I-REN appreciates the consideration of both options but only offers qualified support to the framework because of the very real difference in the likelihood of each option. It is much more likely for larger PAs, like IOUs, to have the time and wherewithal to propose that regional programs become consolidated into statewide programs, and much less likely for statewide programs to be split into regional programs.

Smaller PAs, like RENs, and the communities they support, may be more vulnerable in the face of proposals to consolidate regionally focused programs into larger

state programs. RENs are not as well equipped as larger PAs to stage a defense of the effectiveness of their regional programs, given their smaller budgets and more prominent focus on equity considerations as opposed to cost-effectiveness.

I-REN appreciates that there are many cases where it may be more practical or beneficial for regional programs to be consolidated into a statewide program; additionally, I-REN appreciates the consideration for splitting a statewide program into smaller programs, especially if it results in increased support for equity communities. I-REN would like to offer qualified support for this proposal by emphasizing the importance of consensus and collaboration in the process of moving programs to or from a Statewide offering. All PAs are interested in providing value for the communities and markets they serve; one portfolio's effectiveness should not come at the expense of another if it means equity communities will be left behind in the process.

VI. Chapter 6: Segmentation and Sector Strategy

A. Portfolio Sector Strategy

Public Sector

The I-REN Public Sector offering will continue to deliver wrap-around services for the local jurisdictions in the I-REN territory. The Public Sector programs will continue to deploy technical assistance and strategic energy planning support to help identify EE and IDSM opportunities and advance the implementation of strategic energy investments in municipal and community buildings, placing an emphasis on equity customers. I-REN will continue to administer its BUC service and provide both digital and person-to-person technical assistance, while offering incentives for meter-based savings through an NMEC approach achieved over three to five years. In the new portfolio period, the Public Sector program will expand resources to fund IDSM energy efficiency projects, advance electrification and low-GWP technology

adoption, expand outreach to additional eligible public agencies such as special districts, and increase code compliance through AB 39.

Many communities within I-REN's territory are under-resourced, and I-REN's Public Sector programs will continue to target jurisdictions lacking staff capacity and technical expertise. The Public Sector programs will continue to leverage I-REN's strong regional partnerships and governance structure to fill gaps left by IOUs, CCAs, and other RENs, ensuring equitable access to energy efficiency, IDSM, electrification, load flexibility, and emissions-reduction services across the Inland Empire.

Cross-cutting: Codes & Standards

I-REN's Codes & Standards program will continue to focus on strengthening compliance and enforcement of California's building energy codes, while supporting local jurisdictions in meeting emerging decarbonization and electrification requirements such as AB 39. The strategy emphasizes training, outreach, and technical assistance tailored to smaller and under-resourced jurisdictions that often lack the staff capacity and expertise to implement complex code updates. By providing multilingual, no-cost training for building officials, plan reviewers, and inspectors, I-REN will encourage compliance of Title 24 and related standards across the region. I-REN will also engage building professionals through targeted outreach and resources that promote compliance and best practices for electrification-ready buildings. The program will support AB 39 efforts by helping jurisdictions align permitting and inspection processes with statewide decarbonization goals. I-REN's program will also provide online technical resources to promote code compliance.

Cross-cutting: Workforce Education & Training

I-REN's Workforce Education & Training program is designed to strengthen the regional clean energy workforce by delivering accessible, locally focused training

and career development opportunities. The Inland Empire has historically faced barriers to workforce development due to its distance from major metropolitan training hubs, leaving a gap between high demand for skilled labor and the availability of qualified workers. To address this, I-REN will expand partnerships with local training providers, community colleges, Universities of California (UCs), California State Universities (CSUs), and workforce boards to offer comprehensive programs that prepare individuals for careers in energy efficiency, electrification, and related fields.

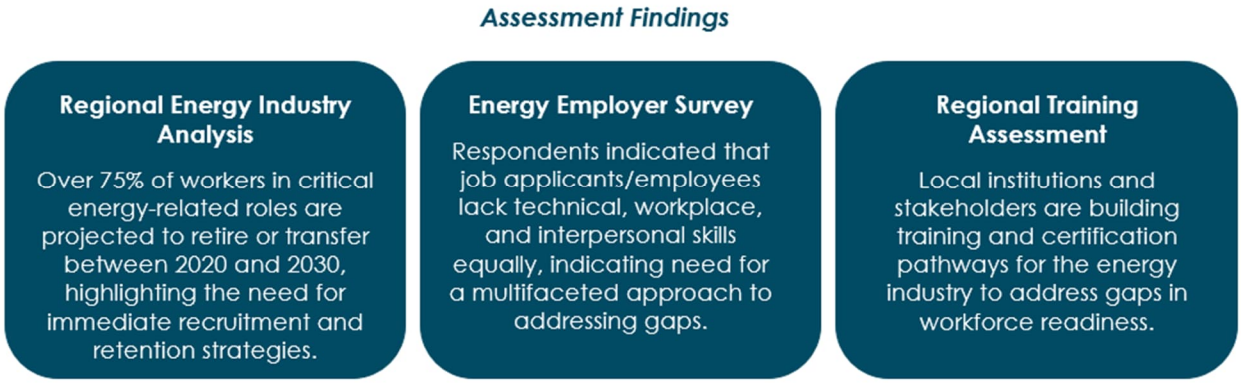
A cornerstone of this strategy is the I-REN Energy Fellowship Program, which places fellows within public agencies to provide hands-on experience in energy planning, project implementation, and compliance support. This program not only builds capacity within public sector agencies but also creates a direct pipeline for skilled professionals to enter the clean energy workforce. By leveraging regional networks and delivering training locally, I-REN will ensure equitable access to opportunities and help bridge connections between job seekers, employers, and training providers. These efforts will foster a sustainable talent pipeline and support the growth of a clean energy economy in the Inland Empire.

I-REN will also use the data collected from its Energy Workforce Gaps Assessment[48] to improve its program. This assessment showed that more than 75% of workers in critical energy-related roles are projected to retire or transfer between 2020 and 2030, highlighting the need for immediate recruitment and retention strategies. To act on this, I-REN's WE&T program will continue to focus on the next generation of workers through its fellowship program, youth outreach, and coordinated efforts with workforce development partners throughout the region. I-REN will continue to partner with local schools, prioritizing those in underservices or disadvantaged areas, to provide school assembly presentations to increase awareness of energy

[48] I-REN's Workforce Assessment is publicly available at https://iren.gov/175/Documents-Recordings, under the section entitled "Workforce Education & Training"

efficiency careers to tens of thousands of engaged students. I-REN will continue to foster existing and develop new partnerships with educational institutions and community organizations to help build career pathways and really focus on that next generation.

Figure 28: I-REN Workforce Assessment Key Findings that Inform Sector Strategies



Other Sectors

I-REN's founding mission and vision, as expressed in I-REN's first business plan and reiterated here in its BPA, are focused on building a stronger clean energy economy and community in which residents, businesses, and local government are connected to resources to increase energy savings and equitable access to the benefits of EE.

In its first business plan, I-REN expressed its intention to eventually pursue market sectors beyond its initial public sector, workforce, and C&S offerings, based on the stakeholder input it had received. These stakeholder needs have not diminished and continue to be voiced by I-REN's local leaders.

Due to statewide concerns about affordability and ratepayer energy bill impacts, I-REN worked with its stakeholders and local leaders to establish an approach that maintains rather than expands I-REN's current market sectors, while implementing a collaborative approach designed to increase awareness across all market sectors in the IE.

Through targeted outreach, and in partnership with other PAs who serve the Inland region, I-REN aims to increase access to energy efficiency programs across the region. These strategies include the following:

- Workforce partnership with the Energy Savings Assistance (ESA) program, described in greater detail in Chapter 6
- Incentive finder tool in development to empower local leaders with information about programs available to their communities
- Coordination with IOU third party and SoCalREN program managers and implementers to provide referrals and improve program awareness
    - For example, as described in Chapter 3, Strategy 2, I-REN has referred projects to SoCalGas and SoCalREN programs resulting in more than 150,000 lifetime therm savings for local agencies.
- Codes & Standards trainings focused on residential and commercial building code standards, which helps these sectors advance their EE efforts through high-quality, code compliant equipment installations

Budget Distribution by Sector

The table below presents I-REN's budget distribution by sector. Note that I-REN's portfolio contains public sector and cross-cutting (WE&T and C&S) sector programs only.

Table 17: Budget Distribution by Sector ($000)

Budget	Res	Com	Ind	Ag	Public	Cross-Cutting	EM&V	Portfolio Support	Total Budget
2028					7,270	8,953	749	1,744	18,716
2029					7,942	9,596	807	1,836	20,182
2030					8,490	9,059	814	1,993	20,357
2031					9,009	10,074	887	2,195	22,165
Total (4-Year)					32,711	37,682	3,257	7,768	81,419
2032					9,357	10,352	916	2,273	22,898
2033					9,743	10,793	954	2,366	23,856
2034					10,120	11,201	990	2,450	24,762
2035					10,511	11,625	1,028	2,537	25,702
Total (4-Year)					39,732	43,971	3,889	9,626	97,217
Cumulative Total (8-Year)					72,443	81,653	7,145	17,394	178,636
Abbreviations: Res = Residential, Com = Commercial, Ind = Industrial, Ag = Agriculture									

B. Portfolio Segmentation Strategy

The strategies driving I-REN's program segmentation are aligned with its central vision and goals:

- Vision: I-REN's vision is to connect residents, businesses, and local government to a wide range of energy efficiency resources to increase energy savings and equitable access throughout San Bernardino and Riverside counties.
- Goal 1. Build capacity and knowledge to enable local governments to effectively leverage energy efficiency services and to demonstrate best practices. (Public Sector)
- Goal 2. Ensure there is a trained workforce to support and realize energy efficiency savings goals across sectors. (WE&T)
- Goal 3. Work closely with local building departments and the building industry to support, train, and enable long-term streamlining of energy code compliance. (Codes and Standards)

I-REN's business plan centers equity in its vision and its approach to the public sector, as well as market support for the workforce, and codes and standards support for streamlining energy code compliance. This aligns with Commission guidance in D.21-05-031 which states that RENs are exempted from the limitation placed on non-REN PAs to spend no more than 30 percent of their portfolio budget on market support and/or equity programs:

> RENs, by their nature and primary purposes, are more likely to have a greater share of their portfolio devoted to market support and/or equity programs. Therefore, those portions of their budgets will not be subjected to an up-front limitation.[49]

[49] D.21-05-031, p. 23.

I-REN's portfolio segmentation follows this guidance in dedicating a greater portion of the I-REN budget to market support and equity programs.

Resource Acquisition

While none of I-REN's programs are segmented as RA, I-REN still contributes to claimable resource savings through its public sector NMEC program, which provides TSB and energy savings. I-REN also refers potential participants to other resource programs in the region offered by other PAs. See, for example, Chapter 3 Strategy 2 for examples of I-REN program referrals resulting in more than 150,000 lifetime therm savings claimed through other programs in the IE region.

Market Support

I-REN's strategies for market support are:

- Outreach, education and technical assistance: Provide outreach and education to customers as a means to build, enable, and maintain demand for energy efficient products and services by fostering interest in, knowledge of the benefits of, or awareness of how to obtain these services. This also includes providing technical assistance to identify projects and support customers with implementation.
- Workforce: Offer comprehensive services to provide the local workforce—inclusive of both existing and emerging professionals—with the knowledge and skills needed to participate in the advanced energy economy by performing and ensuring quality installations that optimize energy efficiency savings.
- Partnerships: Build new and maintain existing partnerships with a diverse group of organizations to advance delivery and/or funding efficiencies for energy efficiency products and/or services and added value for partners.

Goals

- Outreach, education, and technical assistance: Be a trusted local resource and communication channel for energy efficiency and decarbonization to address the climate crisis and build regional resilience.
- Workforce: Enhance regional economic vitality by growing the market for energy projects and developing a local workforce with the expertise and resources to implement upgrades.
- Partnerships: In collaboration with diverse partners, provide holistic, scaled, and bundled solutions to meet customer needs.

Outcomes

- Outreach, education, and technical assistance: Increased awareness and demand for energy efficiency programs that accelerate achievement of State and local climate goals and result in economic development benefits.
- Workforce: A well-trained, supported, and sustainable local workforce with the technical skills and knowledge to offer services that comply with building codes and State goals.
- Partnerships: Leverage partnerships to increase access to and participation in efficiency programs by hard-to-reach and other populations.

In addition to the strategies, goals, and outcomes above, I-REN also aims to achieve the following Market Support objectives through the following outlined strategies:

Table 18: Market Support Sub-Objectives & I-REN Strategies

Market Support Sub-Objectives	I-REN Strategy
Sub-Objective #1: Demand: Build, enable, and maintain demand for energy efficient products and services in all sectors and industries to ensure interest in, knowledge of benefits of, or awareness of how to obtain energy efficiency products and/or services. [Activity example: educating customers]	Outreach, education and technical assistance: Provide outreach and education to customers to build, enable, and maintain demand for energy efficient products and services by fostering interest in, knowledge of the benefits of, or awareness of how to obtain these services. Provide technical assistance to identify projects and support customers with implementation.
Sub-Objective #2: Supply: Build, enable, and maintain supply chains to increase the capability and motivation of market actors to supply energy efficient products and/or services, and to increase the ability, capability, and motivation of market actors to perform/ensure quality installations that optimize energy efficiency savings. [Activity example: training contractors]	Workforce: Offer comprehensive services to provide the local workforce—inclusive of both existing and emerging professionals—with the knowledge and skills needed to participate in the advanced energy economy by performing and ensuring quality installations that optimize energy efficiency savings.
Sub-Objective #3: Partnerships: Build, enable, and maintain partnerships with consumers, governments, advocates, contractors, suppliers, manufacturers, community-based organizations and/or other entities to obtain delivery and/or	Partnerships: Build new and maintain existing partnerships with a diverse group of organizations to advance delivery and/or funding efficiencies for energy efficiency products and/or services and added value for partners.

Market Support Sub-Objectives	I-REN Strategy
funding efficiencies for energy efficiency products and/or services and added value for partners. [Activity example: building partnerships]	
Sub-Objective #4: Innovation and Accessibility: Build, enable, and maintain innovation and accessibility in technologies, approaches, and services development to increase value, decrease costs, increase energy efficiency, and/or increase scale of and/or access to emerging or existing energy efficient products and/or services. [Activity example: moving beneficial technologies towards greater cost-effectiveness or declining costs.]	IDSM: As climate change increases the frequency of extreme weather and the strain on critical grid infrastructure, I-REN is committed to improving the resiliency of communities in the Inland Empire by improving knowledge of and access to distributed energy resources.
Sub-Objective #5: Access to Capital: Build, enable, and maintain greater, broader, and/or more equitable access to capital and program coordination to increase affordability of and investment in energy efficient projects, products, or services. [Activity example: financing.]	Outreach, education and technical assistance: I-REN equips public agencies and local leaders with the information they need to navigate the EE market, identifying program offerings made available by other PAs and providing access to grants or other funding options.

The sectors I-REN proposes to serve in the market support segment are cross-cutting, as I-REN's market support programs are WE&T programs. The primary target

audiences of I-REN's market support programs are future and current members of the EE workforce. I-REN market support programs do not directly serve single family and manufactured home customers; however, building professionals and members of the EE workforce trained through I-REN market support programs may perform EE installations in single family and manufactured homes.

Equity

I-REN's segment-specific strategies, goals, and outcomes for equity are based on the Commission's adopted objective for equity and directly correlate with I-REN's overall strategic framework.

Strategy: Provide holistic, scaled, and bundled solutions to address disparities in access to energy efficiency programs and workforce opportunities; promote resilience, health, comfort, safety, energy affordability, and/or energy savings; and reduce energy-related greenhouse gas and criteria pollutant emissions.

Goal: Provide equitable opportunities for hard-to-reach, disadvantaged and underserved communities to participate in energy efficiency programs.

Outcome: Increase participation in energy efficiency programs designed for hard-to-reach and other populations in the Inland Empire Region, in alignment with equity segment objectives.

I-REN would also like to take this opportunity to call out certain equity definitions requiring further refinement. Specifically, I-REN suggests a re-evaluation of the geographic criterion for HTR:

- *Customers or customer premises in areas other than the United States Office of Management and Budget Combined Statistical Areas of the San Francisco Bay Area, the Greater Los Angeles Area and the Greater Sacramento Area or the Office of Management and Budget metropolitan statistical areas of San Diego County*

While I-REN was formed to meet the specific energy efficiency needs of the Inland Empire, geographically, Riverside and San Bernardino Counties are considered a part of the Greater Los Angeles Area, which spans over 33,000 square miles and includes the entire span of both I-REN counties. Establishing the entirety of both counties as within the greater Los Angeles Area means that many communities are not considered geographically hard to reach, despite requiring lengthy drive times for qualified contractors to commute to these locations.

While I-REN has no plans to add new programs, and its two Public Sector programs remain its only programs in the equity segment, I-REN is committed to supporting equity target participants through its C&S and WE&T programs as well.

The sector I-REN proposes to serve in its equity programs is the public sector. I-REN equity programs do not directly serve single family and manufactured home customers.

Codes & Standards

Per D.23-06-055 at 13-14: The codes and standards segment generally has the following primary purposes:

1. Influencing standards and code-setting bodies (such as the CEC) to strengthen energy efficiency regulations;
2. Improving compliance with existing codes and standards
3. Assisting local governments to develop ordinances that exceed statewide minimum requirements; and
4. Coordinating with the other programs and entities to support the state's policy goals.

I-REN's strategy for the Codes & Standards segment is to continue increasing compliance with California's Building Energy Efficiency Standards and supporting statewide decarbonization goals, such as AB39. I-REN's strategy will emphasize

education, technical assistance, and integration with electrification planning. Key components will include:

Training & Education: Deliver multilingual, no-cost training for building officials, designers, and contractors, including specialized sessions for underserved jurisdictions.

- Technical Support: Provide plan review assistance, compliance documentation guidance, and on-call expert support for local agencies.
- AB 39 Alignment: Incorporate AB 39 requirements into training and resources, ensuring local governments understand and implement building decarbonization mandates and electrification readiness standards.
- Electrification Planning Support: Offer technical guidance and tools to help jurisdictions integrate electrification into local climate action plans, building codes, and permitting processes.
- Collaboration: Partner with local governments, tribal entities, and industry associations to ensure consistent interpretation and application of codes.
- Continuous Improvement: Collect feedback from participants and integrate lessons learned into future offerings to align with statewide C&S goals.

I-REN's Codes & Standards program will continue serving the public and private sector, including local government building departments, public sector facilities, building professionals, and community-based organizations. I-REN's Codes & Standards program intends to expand its outreach to contractor associations in an effort to engage with more building professionals and advance code compliance.

I-REN also emphasizes cross-sector coordination and will leverage its Codes & Standards segment to support both the Public and WE&T segment. This will include cross-sector coordination for AB 39 technical support, IDSM, and workforce trainings.

VII. Chapter 7: Portfolio Coordination

A. Segment and Sector Specific Coordination

Coordination within I-REN Portfolio

I-REN conducts quarterly all-implementer meetings to coordinate between its programs. The purpose of I-REN's all-implementer meetings is to ensure each sector is familiar with other sector activities, which lead to identifying and creating opportunities for programs to collaborate and support each other. This cross-sector coordination has led to all three sectors working together on multiple occasions. One example is the Inland Zero Emissions Vehicles Network Forum, which included representatives from I-REN's Codes & Standards sector and its Public sector as panelists, and the Workforce Education & Training sector being an important participant to the discussions. I-REN's cross-sector coordination was also highlighted at the CalREN forum, where a Codes & Standards representative gave a presentation on Workforce considerations and received input from the Public sector as well. This cross-sector collaboration continues to grow with the all-implementer meetings and will prove useful for upcoming plans such as AB39.

AB 39's mandate for building decarbonization and electrification readiness is an opportunity for coordination across I-REN's three program segments. The Public Sector program will help local agencies develop plans for electrification. The Codes & Standards program will incorporate AB 39 compliance into training and technical assistance for building officials, designers, and contractors, supporting consistent application of electrification plans. Meanwhile, the Workforce Education & Training program will develop the skilled labor pipeline needed to implement AB 39-compliant projects, training Energy Fellows and contractors on electrification technologies and permitting processes. Together, these efforts create a coordinated approach that aligns policy, technical expertise, and workforce capacity to accelerate regional decarbonization goals.

Within each sector, I-REN members meet regularly with its implementers to ensure programs are on track and are progressing towards I-REN's goals.

Coordination with Other PAs

1. Coordination Participants

I-REN's service area shares a geographic region with SCE, SoCalGas, and SoCalREN. Details of coordination are in the section below.

Desert Community Energy, a community choice aggregator (CCA) in the Inland Empire region, submitted an Elect to Administer (ETA) AL in November 2025. DCE serves the residents of Palm Springs in Riverside County, and its Joint Power Agreement (JPA) is supported administratively, financially, and legally by CVAG, one of I-REN's governing partners. If DCE's ETA AL is approved, CVAG's relationship to DCE and I-REN will allow for streamlined and comprehensive coordination between DCE's ETA plan and I-REN's programs. CalChoice is also pursuing an ETA pathway that will share I-REN territory, for example, Apple Valley, which is an I-REN member jurisdiction with representation on the I-REN Executive Committee. If CalChoice's ETA AL is approved, I-REN will have a streamlined ability to coordinate with CalChoice programs as well.

2. Coordination Structure and Frequency

I-REN implements a variety of venues for coordination with other PAs in the Southern California region, including JCMs, Program Administrator Sector Coordination Meetings (PASC Meetings), as well as ad hoc meetings and bimonthly check-ins with its neighbor REN, SoCalREN. Regular monthly check-ins with I-REN's IOU partners, SCE and SCG, are expected to commence in 2026, building upon an already robust coordination framework through program operations and referrals, and the bimonthly/quarterly PASC meeting process.

In the 2024 SoCal JCM, I-REN and other SoCal PAs agreed upon a baseline portfolio-wide approach to collaboration via quarterly PASC meetings; this

approach was further refined in the filing of the Tier 2 Advice Letter (AL) responding to D.23-06-055 OP 32. The following table outlines the PASC meeting structure and expected outcomes:

Table 19: Portfolio Administrator Sector Coordination Meeting Framework

Frequency	• PASC meetings will occur on a regular schedule and follow a structured format. • Meeting scheduling will be transparent and informed by each PA's availability. • Each sector has determined the frequency with which they plan to conduct PASC meetings; these details are shared in the *Strategies by Sector* section of this document.
Attendees	• Attendees will ideally include at least one direct representative from each PA organization. • Third-party implementers as well as PA Policy Leads can be included at the discretion of the managing PA based on meeting agenda content to ensure efficient use of resources. • Meetings will prioritize a virtual approach to foster inclusivity across the region. When possible or in conjunction with other in-person activities, PAs can hold in-person or hybrid meetings depending upon PA availability.
Agenda	• Topics discussed in PASC meetings will include, but are not limited to, program entry, exit and amendments (changes) that may impact how the programs possibly conflict or compete with each other (duplicity), PA staffing, key customer contact updates, customer confusion, successes that are repeatable through best practices, and potential overlap with new market trends or policy changes.. • Additional topics as guided by PA input. • A sample of a possible PASC meeting agenda template is provided as Appendix C.
Facilitation	• The PASC meeting facilitator[3] will contact all SoCal PAs by e-mail two weeks prior to the PASC meeting to request items for inclusion in the agenda. • Completed agendas will be delivered to PAs one week prior to the scheduled meeting date. • Notes and follow-up items will be distributed within two business days of the meeting.

For the last several years since implementation of the PASC meeting structure, I-REN has served in the leadership role for Public Sector PASC meetings, while also actively participating in PASC meetings for WE&T and C&S. Titles of typical

attendees include: Program Manager, Analyst, Advisor, Consultant, Field Specialist, Regulatory/Policy/Reporting Lead.

3. Coordination Practices (Overlap Identification and Mitigation Workflow)

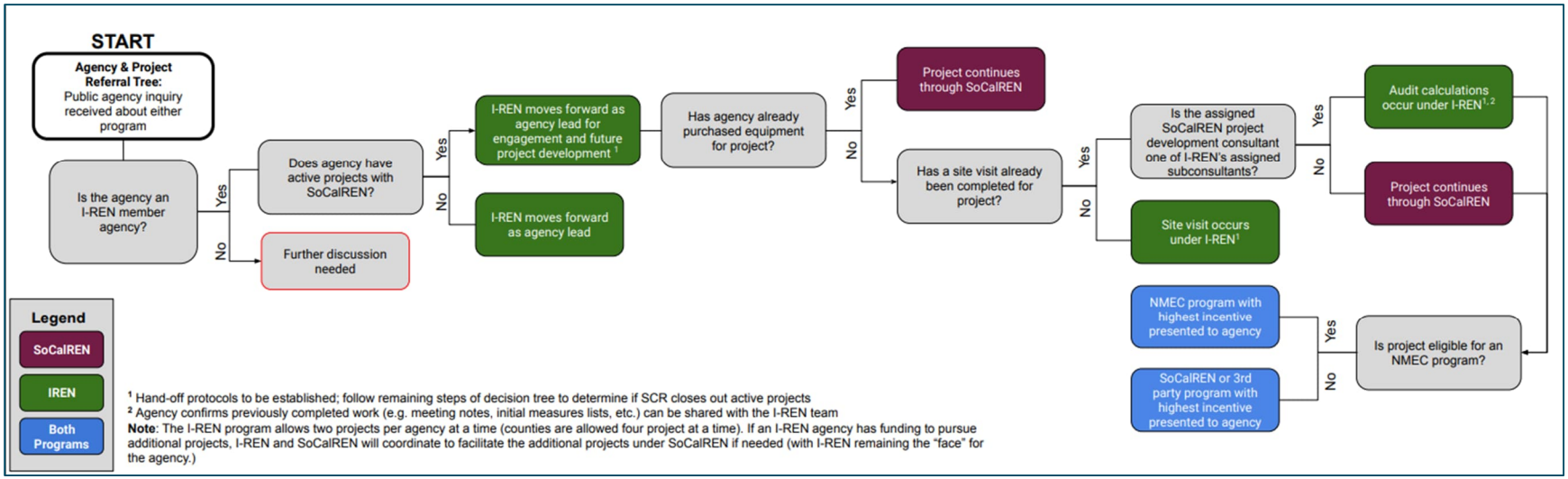
Ordering Paragraph (OP) 32 of D.23-06-055 directed the PAs to provide information on substantively similar programs and steps that they have taken and will take to mitigate or minimize ratepayer risk of program overlap and duplication in a Tier 2 AL. The Tier 2 AL, submitted in June 2025, provided details of the criteria used in the process of drafting the AL to identify potential program overlap and set the stage for regular PA coordination to ensure overlap is mitigated.

During the AL development process, all PAs agreed upon matching criteria which were available for analysis from the catalog of programs hosted on the CEDARS platform. These criteria included evaluation of program sector, delivery channel, market channel, program segment, the IOU Service Territory in which the program operates, the target audience of the program, and the exact location of program service. The result of this effort was that CPUC reaffirmed that it is appropriate for PAs to use existing venues, such as JCMs and PASC meetings, for continuing coordination.

I-REN has coordinated actively with the other PAs in its region on outreach events and regional forums. Over the past year I-REN has been coordinating with the statewide EnergyCodeAce team to develop translated energy code educational materials.

Notably, I-REN has also developed a unique coordination strategy with SoCalREN, given both geographic proximity and similarities in both PA portfolios. This coordination strategy, shown in the sample decision tree figure that follows, has proven successful in mitigating overlap and improving EE funding efficiency between the two PAs.

Figure 29: I-REN and SoCalREN Public Agency Project Decision Tree Example



4. Coordination among REN PAs

In addition to coordinating among all PAs, the joint REN PAs collaborate to ensure local governments have a voice within the California energy efficiency portfolio. Two crucial venues for REN PA coordination and stakeholder engagement are the California Climate and Energy Collaborative (CCEC) and the California Regional Energy Networks (CalREN) organization.

CCEC (previously the Statewide Energy Efficiency Collaborative or SEEC) began as a directive of the California Public Utilities Commission in 2010, with funding from the Joint IOUs. In the years leading up to 2020, local government partnerships (LGPs) experienced a precipitous decline in IOU funding. In parallel, the utilities also elected to discontinue funding for SEEC (CEEC). After hearing the concerns of local governments faced with elimination of their role in CPUC energy efficiency activities, the Commission agreed that the role of RENs may increase due to the decline in LGPs.

RENs sought to continue building knowledge and capacity among local governments, community-based organizations, and those who support them, developing a network that currently includes over 4,000 practitioners working to advance local energy efficiency and climate action in coordination with key state goals and agencies. RENs have become key players in delivering equitable energy efficiency benefits to ratepayers. Accordingly, the RENs committed to continue jointly funding CCEC[50] as a venue for local government engagement and received the support of Energy Division. Since that time, the number of RENs has grown from three to seven REN PAs serving more than 37 million Californians—94% of the state's population.

[50] See, for example, Bay Area Regional Energy Network Strategic Business Plan 2024-2031 Testimony at 44.

CCEC, through CivicWell, convenes the Annual California Climate & Energy Forum, bringing together local governments, state agencies, community organizations, utility and CCA PAs, and other key stakeholders to coordinate with each other, share best practices and support local leadership in climate action. CCEC also provides local governments and other stakeholders with access to resource libraries, technical assistance and other services.

CalREN was started in 2022 to provide a venue for REN PAs to share information, build on collective successes, and work together to coordinate and streamline activities between RENs in order to increase their impact and improve the cost-effective use of rate-payer funds. To further streamline efficiencies, in 2025 RENs added their CalREN services to the CivicWell contract to enhance coordination and create additional cost savings.

Starting in 2027 and for the Business Plan period, the CivicWell contract covering both CalREN and CCEC activities will be budgeted consistently by all REN PAs, with costs divided between the Administration (85-100%) and Marketing (0-15%) categories, as applicable.

The joint RENs' coordination and stakeholder engagement practices through CalREN and CCEC align with statewide goals to increase equity and accountability to ratepayers and ensure local governments have a role in energy efficiency to uplift their communities' needs.[51]

[51] D.19-12-021, Conclusion of Law 4, p. 84.

Figure 30: Combined Service Territory of Authorized RENs

Source: https://californiaregionalenergynetworks.org/, accessed 12/4/25.

Coordination with Market Transformation

I-REN is interested in coordinating with Market Transformation activities which meet the needs of its tribal, hard-to-reach and disadvantaged communities, in alignment with guidance provided by the Disadvantaged Communities Advisory Group (DACAG). Areas of primary focus include advancing resilience through IDSM and distributed energy resources (DERs), as well as weatherization and heat pump technologies that improve the comfort and safety of I-REN communities and the development of I-REN's workforce partners.

Coordination with Energy Savings Assistance (ESA) Programs

The portfolio proposed by I-REN in this BPA does not include residential programs and therefore does not overlap with the ESA program. However, I-REN received direct input from its stakeholders that IE communities need greater awareness of and access to residential EE opportunities. In parallel, CPUC Energy Division indicated an interest in I-REN's support to increase the number of trained ESA contractors located in and serving the IE region as there currently are very few.

Based on this input, I-REN is currently exploring coordination with the ESA program provided by SCE, which offers income-qualified homeowners and renters the opportunity to receive energy-saving home improvements. These improvements include heat pump water heater replacements, or energy-efficient appliances, such refrigerators, clothes washers, or dishwasher replacements, and more. The ESA program covers the cost of these installations provided they are done by authorized contractors.

I-REN intends to coordinate its Workforce programs with the ESA program's contractor network and align training with the standards needed for certification. I-REN is meeting with ESA program partners to develop a workforce pathway that would offer on-the-job resources and no-cost training, as well as improved knowledge of the program from cradle to career. This coordinated approach

leverages I-REN's existing workforce partnerships and program framework and the existing ESA program framework, rather than creating a duplicative program. Through these coordinated efforts, I-REN intends to expand the contractor pool for ESA projects, with the multilayered benefits of providing local EE workforce opportunities and increasing ESA benefits to IE residents.

I-REN has vetted this concept with Energy Division staff as part of its BPA development process and is actively working to establish those coordination practices now, and proposes to continue pursuing this coordinated approach in 2028 and beyond during the new EE and ESA program cycles.

The recent 3/2/26 Low-Income Oversight Board's recommendations regarding the Scoping Memo for the Next CARE/FERA/ESA Program Cycle Proceeding are aligned with the approaches I-REN is exploring:

Table 20: I-REN ESA Workforce Coordination Alignment with 3/2/26 LIOB Policy Recommendations

LIOB Issue & Description from Letter	Relevant Topics from LIOB Policy Recommendations	I-REN ESA Workforce Coordination Alignment
Issue 3. Targeting DACs, rural communities and HTR communities While it is acknowledged IOUs have made noteworthy attempts to improve the service reach of ESA to California Tribal Areas, these efforts have yielded marginal improvement to date. IOU applications for the upcoming program cycle propose to maintain use of existing outreach, enrollment, and service delivery strategies to promote awareness and the extending of ESA services to tribal areas. To effectively serve this hard-to-reach and hard-to-serve customer segment, new strategies and approaches are needed in order to make more meaningful strides to serving this customer segment over the course of the next program cycle.	• Study to identify barriers to current ESA tribal area outreach • Apply learnings to evolve outreach and service delivery strategies for tribal areas • Discover other government agencies that deliver services and outreach to tribes for public purpose/assistance programs, to explore efficiencies in ESA outreach and maximizing ratepayer ME&O investments	There are 17 tribes in the I-REN service area, and tribes are included as local government stakeholders in the I-REN member COGs. I-REN and its stakeholders are eager to see the ESA program succeed in DACs, rural communities, HTR communities and tribal areas in the IE, and can be a source of support for outreach to these areas. There may be efficiencies found by leveraging I-REN's existing relationships for outreach, to maximize ratepayer ME&O investments and increase services to these underserved and unserved communities.

LIOB Issue & Description from Letter	Relevant Topics from LIOB Policy Recommendations	I-REN ESA Workforce Coordination Alignment
<u>Issue 4. Workforce Management and Development</u> IOU applications reflect different strategies and investments to support the ESA workforce. Understanding the ESA workforce is the figurative backbone of ESA performing all facets of from customer acquisition to servicing, it's time that IOUs adopt a different philosophy for maintaining a competent and well-trained workforce – one that pools IOU workforce-related investments to realize economies of scale benefits.	• The current WE&T system is inefficient and not sustainable with regard to employee retention	Based on information from Energy Division, the I-REN region lacks enough trained ESA contractors to address low income communities' EE needs; existing ESA contractors are not local and must travel to the region to serve customers. Given the IE region's economic struggles (see Chapter 2) related to lower income communities and lack of good paying jobs, I-REN is pursuing a WE&T collaboration with the ESA program in its region to supplement the existing ESA workforce with local workers and increase low income EE services to the IE. This approach maximizes ratepayer dollars by leveraging I-REN's regional WE&T connections and promotes affordability across multiple dimensions: maximizing ratepayer dollars by leveraging existing programs, increasing the demand and supply for EE work in the region to retain skilled workers in the local economy, and by delivering bill savings to residential customers who are most in need.

Coordination with Other Demand Side Programs

I-REN is a regional partner supporting the California Energy Commission Equitable Building Decarbonization (EBD) Program in the southern region. The EBD Program focuses on direct install decarbonization upgrades for low- and moderate-income households, disadvantaged communities, and tribes. I-REN's Business Plan does not include a residential sector. However, I-REN's member agencies have asked for programs to serve their residents. As a regional partner I-REN will help increase awareness of the EBD program in the Inland Empire. I-REN is committed to learning best practices to develop partner relationships with the residential sector.

In line with the public sector objective to help local governments afford and finance a range of EE upgrades, I-REN has helped agencies to pursue Energy Efficiency & Conservation Block Grant (EECBG) funding offered through the U.S. Department of Energy (DOE). I-REN's support included facilitating the application processes, providing sample applications, offering technical assistance and guidance, hosting information sessions, coordinating with the DOE and the CEC, navigating funding options, and enhancing community energy strategies.

In today's political landscape, federal funding for these grants is not as dependable. I-REN is committed to identifying alternatives that may be present in state programs. Funding sources may shift, but the practices and strategies developed for one set of funding sources may be adapted to seek out other opportunities to support demand side savings. Public Sector audits also help identify technologies that are demand-response ready, increasing opportunities for participation in DR programs.

VIII. Chapter 8: Stakeholder Engagement

A. Stakeholder Engagement Overview

Since before its inception as a REN and through the present day, I-REN has been committed to stakeholder engagement as a key driver of program design and continuous improvement. This means intentionally fostering relationships that allow for community input to I-REN's portfolio, and maintaining those relationships over time. For I-REN, stakeholder engagement is not a one-way transaction at key milestones such as the BPA, but rather a bilateral and ongoing practice where I-REN is accountable to its communities for acting on the input received.

In the sections that follow, I-REN describes three key elements of its stakeholder outreach and engagement—all of which have informed this BPA.

- Ongoing engagement for community-informed programs
- Business plan engagement
- Evaluation studies of the current 2022-2027 I-REN portfolio

B. Ongoing Engagement for Community-Informed Programs

Stakeholder engagement is crucially important to understand the region's challenges and determine how I-REN can continuously improve its programs to fill these gaps. By engaging local and regional stakeholders on an ongoing basis, I-REN receives valuable insights to guide and design inclusive and impactful programs that reflect the region's needs and priorities. The ongoing nature of this community engagement is key for ensuring accountability between I-REN and its stakeholders.

I-REN's jurisdiction varies geographically and covers a large area, with dense populated cities, tribal lands, and rural sparsely populated towns, which can make engagement challenging. Additionally, many local governments throughout the

region lack capacity, making it difficult to conduct outreach with these hard-to-reach public sector staff.

Despite these challenges, I-REN has successfully leveraged its three governing Council of Governments (or COGS) to build relationships with member agencies, special districts, community members, workforce organizations, community-based organizations, and agencies. I-REN now has strong ties throughout the region and an ongoing feedback loop to continue improving its programs and better serve the region. Below are some of the highlighted ongoing engagement efforts I-REN leads.

- I-REN has established partnerships with local 4-year universities, the Inland Empire Desert Regional Consortium for the community colleges, the San Bernardino County Superintendent of Schools, and the Riverside County Education Office. I-REN is currently developing and partnering with educational institutions at all levels, from elementary to university.
- I-REN collaborates with community partners such as the Inland Empire Labor Institute, Inland Economic Growth & Opportunity organization, both Riverside and San Bernardino County Workforce Development Districts, and other regional leaders.
- Expanding and strengthening close relationships with COG member agencies through constant communication updates. I-REN sponsors the annual State of the City/County in the region.
- I-REN has recently connected and will continue to build relationships with the California Special Districts Association for San Bernardino and Riverside Counties.
- I-REN is building up relationships with contractors in the region, inviting them to trainings, and gathering their feedback as stakeholders for increasing EE career awareness and opportunities. In a recent example, I-REN engaged

HVAC contractors at the Institute of Heating and Air Conditioning Industries (IHACI) conference to learn more about how employers can train and retain employees. Eight contractors located and/or servicing the Inland Empire were interviewed. Each offered insight into hiring status and practices, how new hires are supported with training, what they look for in a candidate, and how they find candidates. Six core themes recurred among interviewees that will inform messaging for HVAC workforce education and outreach campaigns:

> "We don't, as managers, build a company; we rely on our employees. We feel that if you can help them with their personal, professional and financial goals and create a plan for them to meet that, they're going to be grateful. They're going to love the culture of the company and they're going to do their best." *-I-REN HVAC employer interview*

- Employers value attitude and willingness to learn over experience.
- Hands-on training gaps: Many new hires lack real-world experience.
- Retention strategies: Providing ongoing mentorship, clear career pathways, and paid training.
- Social media is a significant sourcing channel (Instagram especially).
- Realistic expectations need to be set for wages and career progression.
- Promote early exposure to sales tools and customer service skills.

- I-REN actively engages partners, agencies, and organizations through its quarterly newsletter.

- Through the I-REN Executive Committee governing board and various other Brown Act committees, I-REN reaches the entire region by connecting to local needs and sharing our I-REN efforts.

C. Business Plan Engagement

In addition to I-REN's ongoing community outreach, I-REN implemented a year-long education and engagement process to inform this BPA and I-REN programs for the 2028-2035 cycle, in alignment with ESJ Action Plan Goal 5: Enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC's decision-making process and benefit from CPUC programs.

The intentions for this process were two-fold: to share information with stakeholders about the CPUC BPA process, and to listen to their needs. This process empowered stakeholders to contribute meaningfully and allowed I-REN to better understand the various challenges and barriers they are facing, along with opportunities they foresee for energy efficiency initiatives in the region, and, when appropriate, glean program-specific feedback for I-REN's next phase.

This year-long BPA stakeholder engagement process began in January 2025, with local leaders from the public sector who make up the I-REN Executive Committee, including mayors and a county supervisor. In seven meetings with the I-REN Executive Committee throughout 2025, I-REN provided education to local government leaders to ensure they understood the CPUC's portfolio application process and what opportunities were available through that process. The I-REN Executive Committee members then shared the needs of their community related to energy efficiency and resilience.

Key themes of the input from these local government representatives are as follows: 1) the services currently provided by I-REN are greatly needed and will require additional time and support to overcome longstanding gaps in capacity and awareness; and 2) the Inland region also lacks awareness of and access to

opportunities for energy efficiency and resiliency for market sectors not currently served by I-REN, e.g., residential, commercial, and industrial. The Executive Committee requested that I-REN consider whether its portfolio should be expanded to address these needs.

Following this guidance from stakeholders, throughout 2025 I-REN undertook careful consideration of how to address these themes in the structure of its 2028-2035 portfolio. A significant overarching concern for I-REN in addressing these questions has been affordability and judicious use of ratepayer dollars.

- In response to key theme #1, I-REN planned and launched evaluation studies and additional stakeholder engagement in 2025 to inform data-driven refinements to its current portfolio. These efforts are detailed in the rest of this section below.
- In response to key theme #2, I-REN examined current programs offered by other PAs in the Inland region to assess potential gaps. This initial assessment, using data from the California Energy Data and Reporting System (CEDARS) as well as other PAs' energy efficiency program websites, indicated that there do appear to be programs available for other market sectors not currently served by I-REN. I-REN shared this information with its local leadership stakeholders, however, their responses indicated that these programs are unfamiliar to and/or underutilized by I-REN communities.
    - I-REN proposes to continue studying regional energy efficiency awareness, potentially through an EM&V study effort described in Chapter 9.

Guided by the engagement, evaluation, and research activities described above and in the rest of this chapter, I-REN proposed to its stakeholders and received their encouragement to move forward with the following overarching intentions for its 2028-2035 application:

- Optimize I-REN's foundational portfolio of programs based on lessons learned, to meet stakeholders' communicated needs and continue strengthening the regional framework being established in 2028-2035.
- Empower local leaders and organizations through education and outreach to foster greater awareness of energy efficiency benefits and opportunities across all sectors in the Inland Empire region.

Informed by stakeholder direction described above, in the Fall of 2025, I-REN conducted the following business plan engagement activities:

- 8 Listening Sessions
- 4 Stakeholder Interviews
- Online Feedback Tool

Audiences represented a range of interests and included:

- I-REN Staff
- I-REN Program Implementers
- Member Agencies or (Local governments in the Inland Region)
- School Districts
- Community-Based Organizations
- Energy Auditors, Code Consultants, Energy Professionals
- County Workforce Representatives
- Past Program Participants
- Prospective Participants

Additional engagement at three I-REN Workforce Roundtable meetings with approximately 20 participants each, and two I-REN All Implementer Meetings with approximately 25 participants each, provided additional insights into programs and the region's needs.

I-REN engaged directly with CEC and ED staff to discuss I-REN's unique position in the EE market, providing valuable insight into the ways in which I-REN can lead in REN accountability for metrics tracking and new goal frameworks. I-REN also coordinated with its fellow PAs, including PAs operating in the inland region as well as other RENs through the CalREN collaborative.

Below is a table representing the key findings, including overall challenges and opportunities in energy efficiency to be considered in the development of future programs, program specific findings, along with how I-REN has incorporated input into this EE Application and future planning.

Table 21: I-REN Stakeholder Input & Responses

Item #	Sector	Stakeholder Input	I-REN Response
Overall Feedback			
1	All	• Increase Education & Awareness o Increase general education on energy efficiency, emphasizing the importance of public health and climate vulnerabilities highlighting what trainings or programs exist, including energy efficiency, technical training, rebates, incentives, or grants and where to find information. o Increase awareness of I-REN in the communities that they serve. o Increase awareness for the process of energy efficiency upgrades, and how to prioritize and sequence multiple necessary upgrades.	I-REN will work to be a hub for energy efficiency in the area by promoting and connecting interested parties to programs that fit their energy needs regardless of whether it is an I-REN program. I-REN will offer additional education on energy efficiency and the benefits of each upgrade. I-REN will increase outreach to jurisdictions, increasing uptake in multiple I-REN programs while promoting a holistic cross-sector approach.
2	All	• Identify Seed Funding o Agencies often lack the start-up or upfront funding needed to make projects happen (i.e., building retrofits and upgrades).	Through I-REN's Technical Assistance and Strategic Energy Planning program, I-REN will continue to offer specialized support and connect agencies with viable seed funding options to support upfront energy efficiency upgrades.

Item #	Sector	Stakeholder Input	I-REN Response
		o Agencies would like to be connected to existing funding and new funding sources (i.e., philanthropy).	I-REN's Cash for Kilowatts incentives program support the cost of these upgrades by providing incentives for energy savings after installation.
3	All	• Build Capacity o Agencies lack capacity and have competing priorities that often outweigh energy efficiency, such as public health and safety requirements.	Through I-REN's Workforce, Education, and Training program, I-REN will continue to train and place Energy Fellows in jurisdictions to bring more capacity to agencies while advancing conversations in energy efficiency.
4	All	• Train Skilled Practitioners o The pool and availability of local and trained energy efficiency contractors are limited o Many employers are focused on upskilling their current employees instead of hiring new trained professionals.	Through I-REN's Workforce, Education & Training Program, I-REN will continue to offer and expand trainings and certifications in the energy field to build up the local workforce in the region. I-REN will expand offerings to include more advanced trainings tailored to professionals already in the field who would like to refresh or advance their skills.

Item #	Sector	Stakeholder Input	I-REN Response
5	All	• Support for Electric Vehicle Transition o Many agencies are moving towards electric vehicle fleets and are looking for both trained technicians to install infrastructure and funding opportunities to support the transition.	I-REN plans to add Integrated Demand Side Management (IDSM) into their Public Sector Technical Assistance offerings including support and education for solar and battery storage upgrades, which can include mobile batteries like EVs. I-REN is also proposing to offer EV charging infrastructure training and certification programs as part of their WE&T programs.
6	All	• Utilize a Regional Approach: o Participants said they would like to see I-REN coordinate more with small businesses and municipalities in the region already doing the work (i.e., trainings or education) to regionally advance energy efficiency and reduce air pollution. • Participants suggested supporting municipalities with their energy efficiency efforts so they can lead by example.	While I-REN does not propose commercial sector programs in this BPA, I-REN proposes to support these audiences through partnerships with local organizations engaged in EE and clean energy work in the region, with EE education and outreach, incentive finder tools, permit/code education and compliance, and through training a skilled workforce. Through I-REN's public sector program, I-REN serves municipalities and special districts with upgrades. I-REN plans to showcase case studies from completed

Item #	Sector	Stakeholder Input	I-REN Response
			projects to increase awareness, promote energy efficiency benefits, and allow these agencies to lead by example.
Public Sector			
7	Public	• Expand offerings beyond electrification to include building systems (i.e., building envelopes, insulation, rehabilitation).	Through I-REN's Technical Assistance program, I-REN identifies potential actionable energy improvement projects and will expand education and connection to additional programs and funding in the region to support energy resilience and whole system upgrades.
8	Public	• Research new and innovative ways to find funding, potentially through sustainability and philanthropic opportunities. • Facilitate connection to existing available funding, including grants, and support with applications	I-REN will continue to offer tailored support to agencies and special districts in the region, including access to available funding and support with seed funding applications. I-REN will continue to provide financial incentives for agencies for energy savings through their Cash for Kilowatts programs.

Item #	Sector	Stakeholder Input	I-REN Response
9	Public	• Consider expanding services, including EV support, off-grid storage support, and EV education.	I-REN will continue and expand IDSM support including education, upgrade support, and connection to funding. I-REN will also offer IDSM training, including EVs as an energy resource, and code support through the WE&T and C&S sectors.
10	Public	• Publicize and promote case studies of completed projects to market benefits and attract new potential projects.	I-REN is updating its marketing strategy and plans to showcase completed projects (or case studies) that reflect the benefits and impact of energy upgrades. By showcasing the benefits I-REN hopes to attract new projects.
11	Public	• Offer a dedicated regional representative that can offer one-on-one support for public agencies and support through the upgrade process.	I-REN currently has regional representatives as represented by the three COG partners. As I-REN continues to grow, program implementers and Energy Fellows will help build capacity and stand as additional resources or representatives for agencies in the region. Additionally, I-REN offers an "Ask an Energy Code Question" on their website, with

Item #	Sector	Stakeholder Input	I-REN Response
			responses within 48 hours, to answer specific questions for agencies.
12	Public	• Offer cross-departmental trainings of I-REN programs, as many member agencies have various departments that do their own capital investment projects and would need to separately work with I-REN. • Utilize existing connections with city department staff to promote I-REN programs and foster new connections with other departments that may be eligible for Public Sector programs.	I-REN will expand its onboarding and general education workshops for agencies to include all departments promoting and informing all three sectors.
13	Public	• Energy Fellows have been successful in advancing energy efficiency conversations and building capacity in agencies.	I-REN is working now to increase the number of Energy Fellows available to support public sector projects within its current Business Plan, and proposes to continue that trend in 2028 and beyond.
14	Public	• Agencies are interested in identifying and prioritizing projects that will be the most impactful and realistic early in the process.	I-REN proposes to expand its public sector technical assistance services to support this stakeholder need.

Item #	Sector	Stakeholder Input	I-REN Response
Codes & Standards			
15	C&S	• Utilize connections with member agencies to increase contractor participation in trainings, as many cities have their own contractor list.	I-REN will update its marketing strategy to ask member agencies to co-promote existing contractor trainings and forums to increase participation and extend their reach.
16	C&S	• Increase capacity of agencies by offering a rotating energy specialist to answer questions.	I-REN will offer a rotating energy specialist who is trained in regional code standards and will travel throughout the region to offer in-person code & permit support to agencies. This energy specialist is meant to build capacity and increase permit compliance in the region.
17	C&S	• Expand codes trainings and forums to offer in-person meetings.	As I-REN's region has a vast spread-out geography it is often difficult to offer a centralized location for trainings. I-REN is proposing a series of workshops that will happen in different accessible locations throughout the region to reach as many participants as possible.

Item #	Sector	Stakeholder Input	I-REN Response
18	C&S	• Increase compliance education, including permit processes, to reduce burden on residents making upgrades.	As part of its training forums, and through public sector offerings, I-REN will continue provide education on the importance of code compliance, and education on the permit process reducing the burden on residents and contractors applying for permits.
19	C&S	• When offering district wide or regional trainings, emphasize the nuances between counties and cities highlighting where to access the information.	As part of the regional in-person forums, I-REN will tailor trainings to emphasize the nuances in codes between cities and provide additional resources on I-REN's website for constant reference.
20	C&S	• Create relationships with third party plan checkers to support agencies.	To increase capacity of agencies I-REN will foster connections and educate third-party plan checkers on the regional and city-specific codes to increase code compliance and streamline processes.
21	C&S	• Work with member agencies to simplify the process and reduce redundancy, as well as burdensome and often inconsequential, processes in codes and permits.	As part of the rotating energy specialist, I-REN will work with agencies to review, and adjust permitting process so that they are easy to access, understand, and fill out to

Item #	Sector	Stakeholder Input	I-REN Response
			increase compliance and reduce burden on applicants.
22	C&S	• Utilize material distributors as trusted conduits of information, and invite staff at distribution centers to trainings. • Contractors as a key means of educating homeowners and/or facilities managers.	I-REN will strive to build relationships with distributors and contractors in the region, invite them to trainings and forums, and provide resources to support education in the region.
23	C&S	• Create an existing knowledge base of resources for the region.	I-REN currently hosts various resources and guides for codes and standards on their website. As codes and regulations continually update, I-REN will continue to be a resource and provide reliable, up-to date information for the region.
Workforce Education & Training			
24	WE&T	• Consider decarbonization as an opportunity for new trainings.	I-REN will expand its education offerings to include decarbonization and promote trainings that are focused on decarbonization.
25	WE&T	• Focus on upskilling current employees, offering more advanced trainings for contractors already in the field.	I-REN will offer trainings at the moderate or advanced level, tailored to participants

Item #	Sector	Stakeholder Input	I-REN Response
			already in the field, looking to refresh, update, or level-up skills.
26	WE&T	• Strengthen connections to career opportunities after trainings, and share immediate next steps once trainings are complete and where to find potential job opportunities or postings. • Connect with firms, universities, small businesses, and potentially unions, both within and outside of the Inland Empire region to expand career opportunities.	I-REN will continue to build relationships throughout the region with workforce and economic boards, universities, small businesses, and to strengthen the career pipeline in the region and offer direct employment opportunities after trainings. I-REN will expand partnerships with organizations close to the region to expand trainings and certifications.
27	WE&T	• Tailor messaging to effectively reach audiences. o Utilize social media to promote trainings to reach youth, highlighting the importance and benefits of trades fighting the negative stigma around trades in youth. o Promote trainings regionally to lift up the local workforce. o Emphasize public health and air quality benefits.	I-REN will update its marketing strategy to include targeted outreach and messages for a range of audiences and outreach platforms.

Item #	Sector	Stakeholder Input	I-REN Response
		o Tailor messages to the older generation, and close to retirement-age, workforce who are less engaged via technology (i.e. social media, email, etc.).	
28	WE&T	• Coordinate with regional agencies offering trainings to expand offerings.	I-REN will continue to build and create relationships with workforce, education, and training institutions in the region, including utilities, community colleges, universities, and workforce boards to collaborate, co-promote, and co-host trainings in the region expanding topics and reach.
29	WE&T	• Expand to offer training in the commercial sector, reaching bigger warehouses and enterprises in the region.	I-REN will expand trainings and certifications to incorporate trainings on larger energy systems including for warehouses and enterprises. I-REN does not currently have a commercial sector to offer energy efficiency projects.
30	WE&T	• Offer practical hands-on training moving beyond "book training."	I-REN will expand offerings to offer both book training and practical training. Upon

Item #	Sector	Stakeholder Input	I-REN Response
			building relationships in the region with potential employers, I-REN will offer hands-on internships and training hours with partner agencies, based on stakeholder input.

D. Current Portfolio EM&V Studies, 2022-2027

In addition to the above stakeholder engagement, I-REN conducted the following EM&V studies in 2025. The purpose of these EM&V studies was to address needs identified through stakeholder engagement to support current program development. Results from these studies helped to inform the programs in this Business Plan.

Public Sector

Study 1. Barriers to Project Pipeline

This study aims to identify and analyze the barriers that prevent agencies from making progress through the project pipeline. The primary objective is to determine the specific obstacles that jurisdictions encounter during the project exploration phase. By understanding these barriers, I-REN can develop strategies to overcome and facilitate smoother project progression.

Results: This study was combined with Study 3 with the goal of obtaining more survey responses. A quantitative survey analysis was combined with qualitative interview findings to complete this study. In the survey, jurisdictions were asked how important I-REN's Public Sector programming is to their organization. Strategic energy planning support was rated as most important, with financing and affordability support and one-on-one project support being ranked the next most important factors. The survey also asked which barriers to engagement with I-REN Public Sector Programs exist, and lack of funding was ranked as the most significant barrier. Identifying these challenges for I-REN's jurisdictions gives I-REN's Public Sector the opportunity to address these barriers with strategic energy planning and connections to energy efficiency funding opportunities.

Study 2: Jurisdictions Meeting Equity Criteria

This study aims to assess which jurisdictions have engaged with I-REN's Public Sector programs and meet the equity criteria defined by the California Public Utilities Commission (CPUC) in D.23-06-055. The primary objective is to evaluate the number of equity jurisdictions participating in the public sector, ensuring that these programs are reaching and benefiting communities that meet the CPUC-defined equity standards.

Results: This study looked at various equity factors including HTR criteria, Equity-eligible incomes, Disadvantaged Communities, Free or Reduced-Price Meals, and Tribal Communities. The results of this study demonstrate that jurisdictions meeting equity-criteria are prevalent in I-REN's territory, however these equity jurisdictions disproportionately show limited or no engagement with I-REN's resources. This demonstrates an opportunity for I-REN to strengthen its outreach to equity jurisdictions.

This finding reinforced what I-REN Executive Committee stakeholders have communicated as an urgent need for greater awareness of EE benefits and opportunities throughout the inland empire, and in particular these equity communities.

Codes & Standards

Study 3: Low Engagement Jurisdictions

This study aims to identify the characteristics of jurisdictions that have little to no participation in I-REN's program offerings. By understanding these characteristics, the study seeks to uncover the underlying reasons for low engagement and develop strategies to address them. The primary objective is to increase both the number and diversity of jurisdictions participating in I-REN's

C&S services, thereby ensuring a more inclusive and widespread adoption of these programs.

Results: This study was combined with Study 1 with the goal of obtaining more survey responses. A quantitative survey analysis was combined with qualitative interview findings to complete this study. In the survey, jurisdictions were asked which barrier was the most significant to participating in I-REN's energy code trainings. Limited staff time was ranked as the most significant barrier. I-REN's C&S program has the opportunity to provide on-demand trainings to its jurisdictions to help address this barrier.

- Study 4: Training Formats

This study aims to review the current training formats and survey I-REN's jurisdictions to identify their preferred training methods. The primary objective is to understand the training preferences of participants and offer a variety of formats that cater to their needs.

Results: This study surveyed training participants to determine which training mode is the most preferred. I-REN's current format of online live trainings was ranked as the most preferred training format and this format is planned to continue in this BPA period.

Workforce Education & Training

- Study 5: Fellow Retention

This study aims to identify and assess the factors that contribute to fellow retention following I-REN's Fellowship Program under Workforce Education and Training (WE&T). The primary objective is to evaluate the needs of site hosts to hire fellows after the completion of the fellowship program. By understanding these factors, the study seeks to develop strategies to improve retention rates and ensure the long-term success of the fellows in their respective roles.

Results: This study looked at a mix of past fellows that completed their fellowship cycle, current fellows in their fellowship cycle, and host agencies that have hosted fellows in the past. For host agencies, barriers to hosting a fellow were identified as lack of awareness of programs as well as not having the staff capacity to supervise a fellow.

Fellows' responses indicated the fellowship clearly supports skill-building in both soft and technical domains. Fellows indicated a self-reported increase in communication and public speaking skills due to training sessions and project responsibilities during the fellowship. Fellows reported an increase in their development of technical areas such as energy auditing, energy code compliance, and project management. Supervisor responses aligned with fellow responses and cited the professional growth and development of fellows.

Importantly, the Fellowship program has already led to permanent employment for several graduates, with two past fellows reporting having been hired on at local agencies, and

- Study 6: Performance Metrics

This study aims to identify and develop metrics that effectively track the success and performance of the Workforce Education and Training (WE&T) program. The primary objective is to create a comprehensive set of metrics that can be used to measure various aspects of the program's success, including participant outcomes, program efficiency, and overall impact.

IX. Chapter 9: Evaluation, Measurement & Verification

A. Summary of Planned EM&V Studies and Activities

I-REN plans to conduct EM&V studies at a portfolio-wide level as well as studies relating to its current sectors and segments. These studies may include but are not necessarily limited to the following:

Portfolio-wide

- Evaluation of program outcomes in alignment with existing and emerging accountability mechanisms. I-REN will explore a portfolio-wide study concept to examine program and portfolio performance over time through the lens of existing metrics and indicators, and in the context of newly emerging accountability mechanisms such as non-energy benefits and impacts, community engagement indicators, equity and market support goals, and awareness/knowledge/attitude/behavior indicators. As these new accountability mechanisms emerge between now and 2028 and are implemented in 2028 and beyond, I-REN is interested in establishing baseline data for its programs and continuing to monitor implementation of these measurements and performance in future years of its portfolio.
- Assessment of growth in energy efficiency awareness in the region. A key element of stakeholder feedback that informs I-REN's business plan is the general lack of awareness of energy efficiency programs in the inland region, across all sectors. I-REN will look to learn from and collaborate with the statewide AKAB studies planned as a result of the PAs' AL (PG&E Advice 4951-G/7344-E). The first wave of studies is in progress now, with the

residential draft report expected June 2026. As indicated in the joint AL[52] and in the Final Research Plan for the California Statewide Residential Awareness, Knowledge, Attitudes and Behavior (AKAB) Study,[53] RENs will have the ability to request an oversample of data for their region. I-REN may be able to use the forthcoming data to establish a baseline for energy efficiency program awareness in the inland region. These results could inform program plans to empower local leaders and stakeholders in I-REN's public sector, workforce, and codes and standards audiences to help increase awareness. Future studies may assist in tracking progress toward increasing awareness.

- Identification of opportunities for workforce standards support. I-REN has experienced challenges in implementing workforce training standards required by CPUC, and is interested in examining potential solutions that can be supported by I-REN through a cross-sector, portfolio-wide approach using workforce partnerships, C&S training and learning management platform, and Public Sector data support. I-REN will look to collaborate with key stakeholders in the workforce space to inform this study.

Public Sector

- Evaluation of existing outreach efforts, including outreach to I-REN's mailing list and stakeholders, to determine ways to increase the percent of service accounts participating in programs through outreach and assistance.

[52] PG&E Advice 4951-G/7344-E at 9 (page 16 of PDF).
[53] California Statewide Residential Awareness, Knowledge, Attitudes and Behavior Study: Draft Research Plan. Cadmus, October 30, 2025, at 14.

Codes & Standards

- Evaluation of current permitting baselines for permits pulled and closed, including assessment of the barriers causing permit non-compliance and non-closure, and identification of solutions for implementation in I-REN's C&S sector offerings.

Workforce Education & Training

- Evaluation of I-REN's jurisdictions to determine if there are new audiences that should be targeted for I-REN's WE&T offerings, including exploring new partnerships with educational institutions or contractor groups.

B. EM&V Budget Allocation & Justification

I-REN has set aside $3,256,757 towards EM&V efforts over the 2028-31 portfolio cycle. Of this total, 27.5% is reserved for I-REN-led EM&V activities, while the remaining 72.5% has been allocated for CPUC Energy Division's evaluation efforts. Overall, this allocation represents no more than 4% of its overall portfolio budget over that same period to be allocated towards EM&V exercises that assess its program offerings and their performance. Overall, this investment is consistent with historical practice and ensures that costs do not exceed the budget cap laid out in the EE Policy Manual and Commission decision language.[54]

X. Chapter 10: Cost & Cost Recovery (IOUs only)

Not applicable.

[54] D.12-11-015 OP 46.

XI. Chapter 11: Recommendations for New or Modified EE Policy

A. Examining Challenges with Workforce Standards

I-REN has experienced ongoing challenges with moving EE installations forward due to CPUC's workforce standards for non-residential projects. Having considered the original intent of the standards and recent evaluation data regarding standards implementation, I-REN recommends examining the following questions:

- Are the incentive amount thresholds adopted in 2018 still appropriate now, 8 years later, given the pandemic- and tariff-related supply chain challenges in the current EE landscape?
- How can PAs, and in particular smaller PAs like RENs, work together with workforce and labor organizations and other key stakeholders to address local gaps in available, qualified technicians to perform work subject to workforce standards?
- Have the PAs experienced lighting control contractors who hold certifications other than the California Advanced Lighting Controls Training Program (CALCTP) and the International Association of Lighting Management Companies Certified Lighting Control Professional (NALMCO CLCP), which may be worth requesting the CPUC to include in the decision?

In 2018, with D.18-10-008, the Commission adopted workforce standards for certain non-residential projects: HVAC projects reserving a project incentive of $3,000 or more, and advanced lighting controls (ALC) projects reserving a project incentive of $2,000 or more. For projects meeting these triggers, the workforce standards outline a set of requirements for installation technicians to meet.

The decision requires that for lighting control projects with incentives of $2,000 or more, controls be installed by technicians with CALCTP certification. In 2024, PG&E submitted an AL to the CPUC proposing that NALMCO CLCP's certification also be included as an alternative certification to meet the workforce requirement, and the proposal was approved.[55]

In the decision language, CPUC describes its desire to "make a start toward workforce requirements, where more stringent or more broadly applicable requirements may be structured and phased in in the future."[56] The Commission acknowledged that at that time, they did not have experience with the practical implications of requiring workforce standards and did not see clear evidence showing a direct correlation between workforce standards and increased energy savings.

In order to take a measured approach at implementing the standards and assessing their impact, the Commission expressed its intent to "start by phasing in the standards, starting with larger non-residential projects only," beginning July 1, 2019. That start date was intended to be followed by a stakeholder discussion at CAEECC no later than July 1, 2020, to consider further application of standards beyond those adopted in the 2018 decision. The Commission requested that PAs propose to extend or augment the standards in their next business plan filings, based on the experience gained with the implementation of the standards during the rolling portfolio business plan period, which at that time was intended to be from 2018 to 2025.[57]

As the PAs began implementing the workforce standards in their new portfolios, March 2020 gave rise to the global COVID-19 pandemic and wreaked havoc

55 Advice 5006-G/7441-E Pacific Gas and Electric Company

56 D.18-10-008 at 11.
57 Ibid, at 12.

on all major industries including EE in California. When CAEECC met to discuss the workforce standards in August 2020, the utilities' third-party contracts were just beginning to be signed. CAEECC members agreed to defer further discussion as there was not enough data to assess implementation of the standards.[58] In November 2024, CAEECC met again to discuss PG&E's proposal for the NALMCO certification to be included in the workforce standards. Members supported the proposal without significant comment.[59]

Two years later in 2022, CPUC hired Opinion Dynamics to conduct an evaluation of the workforce standards. The evaluation report, released in September 2024, contained findings that resonate with I-REN's experience in 2025-2026 implementing the workforce standards:

- Incentive threshold: in decision language, the CPUC stated its purpose to "gain experience by phasing in the standards starting with the largest and most complex projects" (emphasis added). The decision bases the incentive threshold amount on an assumption regarding incentives as a percentage of overall project costs, and the intention to cover some smaller projects and all larger projects,[60] so that the requirements would apply to "only a subset of the market."[61]
    - However, the workforce standards evaluation report shows that a significant majority of all projects meet or exceed the incentive threshold. Of projects that received incentives during the study

[58] CAEECC 8/6/2020 Mtg Summary of item: Additional Workforce Standards, Lara Ettenson, NRDC; *8.6.20 Coordinating Committee Meeting | CAEECC*; accessed February 2, 2026.

59 Full Quarterly CAEECC Meeting #44 Summary. See page 12

[60] D.18-10-008 at 25.
[61] Ibid, at 13.

period, 803 out of 869 HVAC projects (92%) and 5,987 of 7,368 ALC projects (81%) met or exceeded the incentive threshold for workforce standards.[62]

- At the time of the decision, the CPUC estimated that, on average, incentives cover 20-40% of project costs.[63] I-REN's Cash for Kilowatts program covers up to 80% of the project cost. Other PAs may also offer incentive rates that far exceed the amount the CPUC estimated in this decision, despite working primarily on small to medium-sized projects.

- Program participation by contractors: multiple parties commented in 2018 regarding the potential for workforce requirements to create barriers for disadvantaged workers, and the Commission acknowledged those concerns as well as the difficulty of implementing workforce standards "while ensuring the availability of appropriately-trained workers."[64]
  - The workforce standards evaluation study shows that these concerns persist and are not limited to only disadvantaged workers but also to contractor participation in general. The study notes, "In addition to limited resources, implementers were concerned about the impact additional requirements like Workforce Standards would have on recruiting contractors and customers to participate in their program. Many implementers shared that they were already recruiting from a relatively small contractor pool of individuals willing

[62] *CPUC Workforce Standards Evaluation Final Report*, prepared by Opinion Dynamics for CPUC, 9/16/24. See p. 36-37.
[63] D.18-10-008 at 16
[64] D.18-10-008 at 11-13.

to complete the various processes and verifications needed as part of an EE incentive program."[65]

Over the past year, I-REN has seen challenges with implementing the workforce standards in its Public Sector NMEC program. After project site walkthroughs with numerous contractor firms to obtain bids on a lighting project, there have been instances in which zero contractors bid because they cannot meet the workforce standards requirements.

In one instance, an agency with a project that could receive a possible $47,169 incentive from the lighting control measure alone decided to drop the measure altogether due to the hurdles created by the workforce requirement.

In total, five projects have lost out on $73,017 due to the lighting control certification requirement. I-REN expects that if the decision and current Acceptance Test Certification Providers' outreach to the IE remains as is, that number will continue to increase as more projects reach approval and construction.

In the Inland Empire, it is already a challenge to find enough technicians for projects, let alone the projects subject to the workforce standards. By the end of 2024, CALCTP had certified a total of 2,109 Lighting Control Acceptance Test Technicians.[66] However, compared to the current list of certified electricians in California (35,997),[67] less than 6% of all active California electricians hold CALCTP certifications. Worse, in 2024, "of certified acceptance test technicians, [only] 572 have maintained their certification and are updated to the 2022 Code. As of 12/31/2024, of all Acceptance Test Technicians certified, 1,537 have lapsed

[65] *CPUC Workforce Standards Evaluation Final Report*, prepared by Opinion Dynamics for CPUC, 9/16/24. See p. 52.
[66] CALCTP 2024 Annual Report, see page 2.
[67] "Certified Electrician List" California Open Data Portal, California Department of Industrial Relations.

certifications."[68] Of the 1,822 installer contractors listed on CALCTP's website, only 50 service the Inland Empire. Similarly, of the 2,109 technicians listed on CALCTP's website, only 166 are part of the Inland Empire. Similarly, only 32 California Technicians hold the alternative NALMCO Certified Lighting Controls Professional Certification.[69]

Based on this experience and in the context of the workforce standards decision and evaluation, I-REN recommends that the following questions could be helpful to examine as part of the implementation of workforce standards in the new business plan cycle.

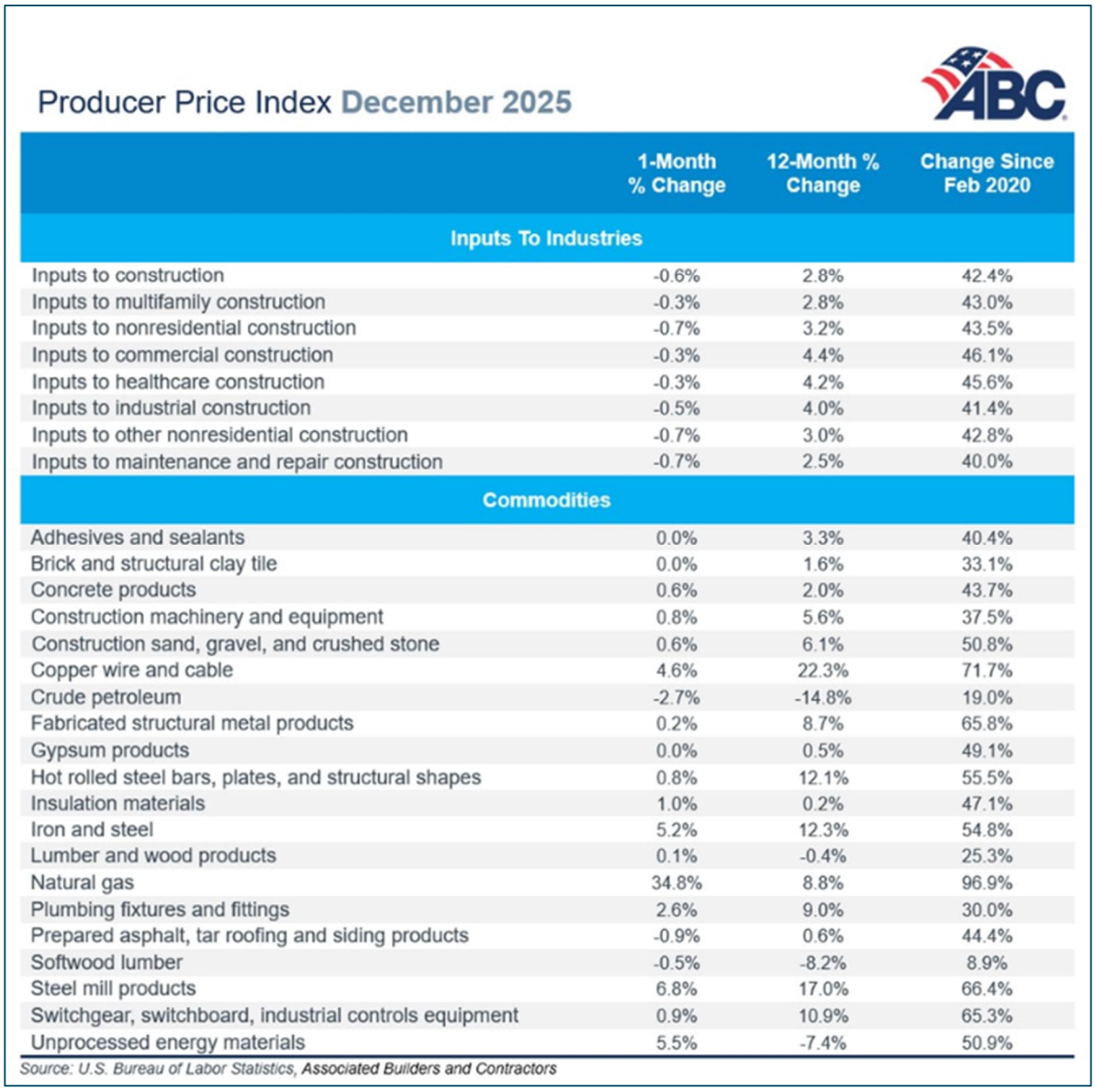
- Are the incentive amount thresholds adopted in 2018 still appropriate now, eight years later, given the pandemic- and tariff-related supply chain challenges in the current EE landscape?
    - As described above, the evaluation study data shows that the standards are not triggering requirements for "only a subset" of projects; they are triggering compliance for the majority of projects.
    - Since the adoption of the standards in 2018, project costs have increased significantly due to supply chain impacts related to the COVID-19 pandemic and recent policies such as tariffs.[70]
    - It may be possible that the thresholds established in 2018 are no longer set at an appropriate level. In recent years, incentives have

[68] CALCTP 2024 Annual Report, see page 2.
[69] NALMCO CLCP Certified Directory.
[70] "Double-digit Increases In Aluminum, Steel And Copper Costs Drive Up Producer Price Indexes For Construction Materials And Equipment In 2025: *High Tariff Rates on Key Materials Appear to Be Enabling Domestic Producers to Make Substantial Price Increases, Making it Hard for Contractors to Know How Much to Bid for Future Projects."* The Associated General Contractors (AGC) of America, Inc., January 30, 2026. Available online, accessed February 3, 2026.

increased proportionally to rising project costs in order to keep pace with the amount needed to move customers to implement EE projects.

- Are the incentive amount triggers accurate for identifying large projects, or are energy-saving or project-cost triggers more accurate for identifying large projects, which this decision was targeted towards?
- Are the contractor certification requirements up-to-date or still relevant with existing code updates and are the ongoing costs to maintain certification too high causing a drop in certified contractors?

Figure 31: Producer Price Index, December 2025



Producer Price Index December 2025

	1-Month % Change	12-Month % Change	Change Since Feb 2020
Inputs To Industries			
Inputs to construction	-0.6%	2.8%	42.4%
Inputs to multifamily construction	-0.3%	2.8%	43.0%
Inputs to nonresidential construction	-0.7%	3.2%	43.5%
Inputs to commercial construction	-0.3%	4.4%	46.1%
Inputs to healthcare construction	-0.3%	4.2%	45.6%
Inputs to industrial construction	-0.5%	4.0%	41.4%
Inputs to other nonresidential construction	-0.7%	3.0%	42.8%
Inputs to maintenance and repair construction	-0.7%	2.5%	40.0%
Commodities			
Adhesives and sealants	0.0%	3.3%	40.4%
Brick and structural clay tile	0.0%	1.6%	33.1%
Concrete products	0.6%	2.0%	43.7%
Construction machinery and equipment	0.8%	5.6%	37.5%
Construction sand, gravel, and crushed stone	0.6%	6.1%	50.8%
Copper wire and cable	4.6%	22.3%	71.7%
Crude petroleum	-2.7%	-14.8%	19.0%
Fabricated structural metal products	0.2%	8.7%	65.8%
Gypsum products	0.0%	0.5%	49.1%
Hot rolled steel bars, plates, and structural shapes	0.8%	12.1%	55.5%
Insulation materials	1.0%	0.2%	47.1%
Iron and steel	5.2%	12.3%	54.8%
Lumber and wood products	0.1%	-0.4%	25.3%
Natural gas	34.8%	8.8%	96.9%
Plumbing fixtures and fittings	2.6%	9.0%	30.0%
Prepared asphalt, tar roofing and siding products	-0.9%	0.6%	44.4%
Softwood lumber	-0.5%	-8.2%	8.9%
Steel mill products	6.8%	17.0%	66.4%
Switchgear, switchboard, industrial controls equipment	0.9%	10.9%	65.3%
Unprocessed energy materials	5.5%	-7.4%	50.9%

Source: U.S. Bureau of Labor Statistics, Associated Builders and Contractors

Source: *News Releases | ABC: Tariffs Drive Construction Materials Prices*

- How can PAs, and in particular smaller PAs like RENs, work together with workforce and labor organizations and other key stakeholders to address local gaps in available, qualified technicians to perform work subject to workforce standards?

- In this BPA, I-REN proposes to continue to refine and expand its WE&T program offerings to overcome known EE workforce challenges in the Inland Empire. I-REN has established partnerships with key workforce organizations in its region and beyond, and is interested in further dialogue and collaboration to help ensure inland region contractors are able to participate in EE programs and projects subject to workforce standards.
- This effort supports affordability through multiple strategies, from the perspective of I-REN's public sector and WE&T offerings:
  - Overcome barriers preventing public sector NMEC projects from moving forward, so that installation of energy-saving equipment can proceed and lower customers' utility bills;
  - Deliver benefits to communities served by public sector agencies, through projects implemented as well as other initiatives that can be funded using energy bill savings; and
  - Increase the ability of trained workforce to participate in the region's EE economy, in family-sustaining careers that help those workers better afford their own energy bills.

- Have the PAs experienced lighting control contractors holding certifications other than CALCTP and NALMCO CLCP that may be worth requesting the CPUC to include in the decision?
  - Another Acceptance Test Technician Certification Provider not included in the original decision is the National Lighting Contractors Association of America's Acceptance Test Technician Certification.

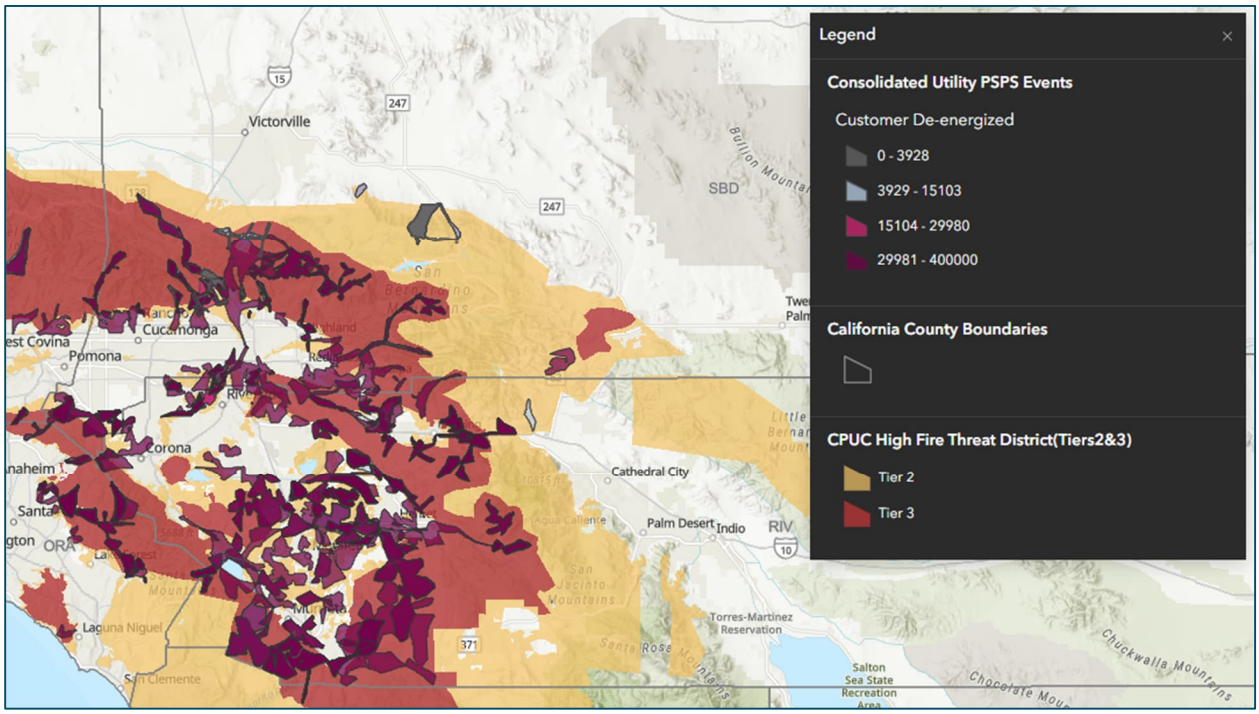
- I-REN is interested in whether other PAs have experienced other certifications to be more widely held by lighting control contractors as possible certifications to recommend the CPUC include in the decision through a Tier II AL.

B. Holistic Approaches for Energy Efficiency and Resiliency

More flexibility regarding use of energy efficiency funding is needed to meet the resiliency needs of the equity communities served by I-REN. These communities are disproportionately affected by climate change impacts and are directly requesting assistance from their local governments to access comprehensive EE and other DER solutions. I-REN recommends that the Commission transition away from the current state mentality of siloed programs to a more holistic and streamlined approach to promote increased demand flexibility, improve customer outcomes, and address equity communities' needs.

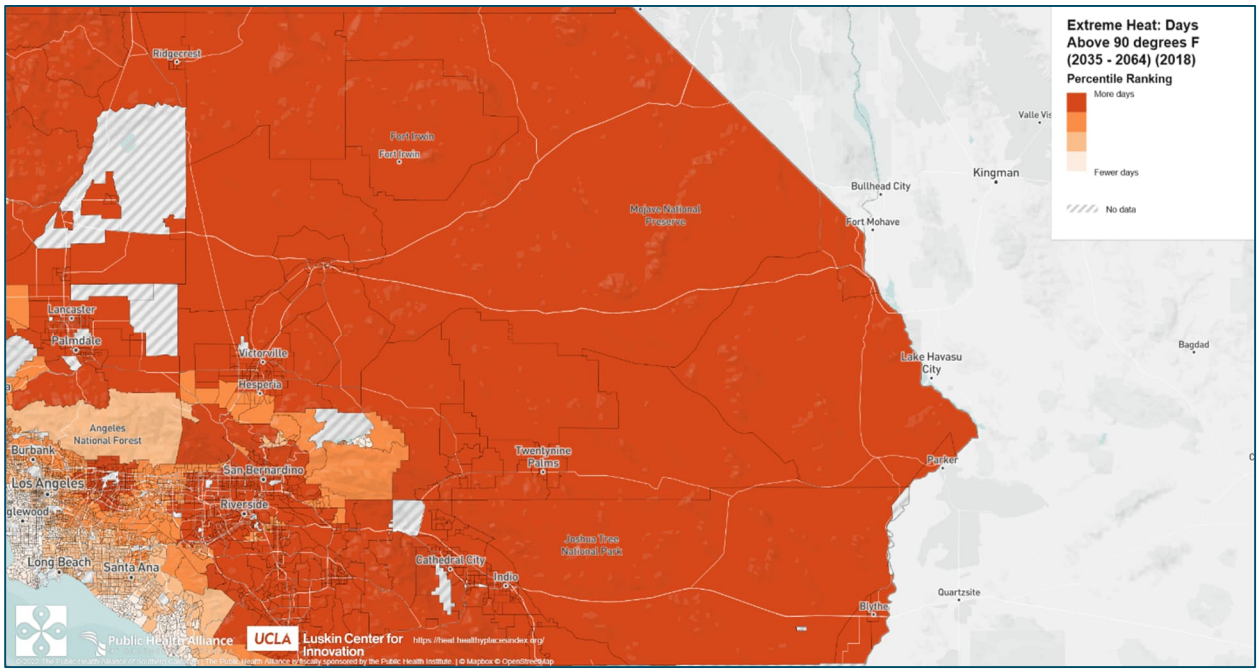
Resiliency issues continue to be of major concern to IE ratepayers as the region is prone to PSPS events and extreme heat, resulting in a dangerous and even deadly combination in which residents have no way to keep their homes cool and must seek shelter elsewhere. See Figure 32 and Figure 33 depicting PSPS events in the IE in recent years, and forecasted increasingly extreme heat for the IE region.

Figure 32: SCE Public Safety Power Shutoffs, October 2021-Present



Source: CPUC Public PSPS Dashboard, available online at https://capuc.maps.arcgis.com/apps/dashboards/ecd21b1c204f47da8b1fcc4c5c3b7d3a accessed March 2026. Map shows high concentration of PSPS events affecting customers in western I-REN territory.

Figure 33: Extreme Heat Forecast for I-REN Region, 2035-2064



Source: California Healthy Places Index: Extreme Heat Edition, available online at https://heat.healthyplacesindex.org/ accessed March 2026.

Local governments in the IE are on the frontline of providing cooling centers to keep their communities safe; however, they must be able to keep the electricity on in order to do so. Having the flexibility to implement holistic EE and DER solutions for public sector facilities would directly support these local agencies in protecting their communities, and avoiding the need for fossil fuel-powered backup generation in an area already facing some of the worst air quality in the nation.

Due to economic hardships noted elsewhere in this BPA (e.g., Chapter 2), local agencies in the IE face steep barriers related to staff capacity and budget available for capital improvements. They need incentives and technical assistance to realize the energy savings, increased ability to withstand power outages, and public health and safety benefits that EE + resiliency projects

could provide. I-REN has become an indispensable source of support for these agencies' EE projects, and will be launching IDSM technical assistance this year as well. However, local agencies want to be able to use the Public Purpose Program (PPP) dollars they have contributed as ratepayers to pursue streamlined, holistic resiliency projects.

As part of I-REN's commitment to ESJ Action Plan Goal 5, to enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC's decision-making process and benefit from CPUC programs, I-REN recommends the Commission continue to streamline participation pathways for local governments seeking EE + resiliency support by allowing flexibility in PA implementation.

I-REN and other RENs submitted joint comments on the Order Instituting Rulemaking for the new EE proceeding (EE OIR), R.25-04-010.[71] One of the policy issues highlighted by the Joint RENs was "Addressing Resiliency in Energy Efficiency." To reiterate those comments:

> While Sections 381 and 399 of the Public Utilities Code delineate the use of EE funds, they do not prohibit the integration of complementary technologies that enhance energy efficiency outcomes. Prior Commission decisions, particularly D.07-10-032 and D.23-06-055, reflect a policy shift towards integrated solutions, recognizing the value of combining energy efficiency with other demand-side resources to achieve comprehensive energy goals. However, more can and should be done to address communities' resiliency needs as climate change impacts accelerate.[72]

[71] Comments of I-REN, SoCalREN, 3C-REN, BayREN, NREN, and SDREN on Order Instituting Rulemaking for Oversight of Energy Efficiency Portfolios, Policies, Programs, and Evaluation (Joint REN comments).
[72] Joint REN comments at 24.

One of the specific requests of the Joint RENs was that the limitation of event-based DR be removed as participation in such energy management strategies yields direct and tangible benefits to customers in the form of bulk power market participation.

> This strategy is intended to offer flexibility to design, pilot, and scale customer-focused solutions for REN participants, which will also prepare their respective service areas for full decarbonization by 2045 or sooner. As federal, state, and local climate goals near their time of completion, the Joint RENs find it imperative to demonstrate success in the proposed framework and programs. While RENs have successfully administered energy efficiency funding for over a decade, there remains a dire need to expand access for equity customers to multi-DER programs authorized in other proceedings—programs that could be significantly enhanced by the unique strengths and value REN administration offers. Additionally, an integrated approach could result in overall administrative efficiencies to the CPUC's programmatic and portfolio frameworks for demand side management.[73]

Holistic approaches to projects incorporating EE + resiliency measures can result in benefits for customers as well as the grid.

> Integrated EE/DR programs can benefit customers, program administrators, and system operators. Customer benefits include utility bill savings, easier program participation, increased resource and service options, and greater satisfaction. Integrated programs help program administrators increase impacts and reduce costs through more streamlined, coordinated communications and integrated services. Utilities and other grid operators benefit through reduced system

[73] Joint REN comments at 25.

costs, improved reliability, and optimized grid performance.[74]

Beginning now with the equity and market support indicator reporting, and continuing to ramp up in the coming years, the Commission and the Joint PAs have been investing time and effort into creating accountability methods for equity and market support programs, which will be important measures of success for RENs. One of these forthcoming metric types is non-energy benefits (NEBs).

The public safety and health benefits of EE + resiliency projects are a clear NEB for IE communities, as are the local government budget amounts that can be offset by reinvesting IE ratepayers' PPP charges into projects benefitting their communities. I-REN is already seeing the impact of its EE incentives for delivering not just energy savings and TSB but community NEBs. Colton Joint Unified School District (CJUSD) partnered with I-REN to complete an interior LED lighting retrofit at Joe Baca Middle School, improving efficiency across 72 classrooms. I-REN helped CJUSD increase equipment efficiency and secure incentives covering roughly 80% of total project costs. The CJUSD energy liaison noted that "[d]espite tight budgets, this check is more than enough to fund one teacher in the classroom. Now that's impact."

I-REN's portfolio is based on interrelated programs that closely support each other's success, for example, the I-REN Energy Fellows that increase local agency staff capacity to implement EE projects. A new framework that streamlines EE + resiliency pathways for I-REN's public sector can also provide

[74] Dan York, Grace Relf, and Corri Waters, "Integrated Energy Efficiency and Demand Response Programs", *American Council for an Energy-Efficient Economy*, September 2019, page iv.

additional NEBs by creating increased demand for local clean energy workforce and code compliance education and support.

As with the Joint REN EE OIR comments, I-REN recommends that the Commission transition away from siloed approaches to EE versus other DERs and instead promote a framework to address service gaps, pilot innovative programs, and deliver multi-DER solutions to equity customers.

C. Re-evaluation of Hard-to-Reach Geographic Criteria

I-REN would also like to take this opportunity to reiterate certain equity definitions requiring further refinement. Specifically, I-REN suggests a re-evaluation of the geographic criterion for HTR:

- *Customers or customer premises in areas other than the United States Office of Management and Budget Combined Statistical Areas of the San Francisco Bay Area, the Greater Los Angeles Area and the Greater Sacramento Area or the Office of Management and Budget metropolitan statistical areas of San Diego County*[75]

While I-REN was formed to meet the specific energy efficiency needs of the Inland Empire, geographically, Riverside and San Bernardino Counties are considered a part of the Greater Los Angeles Area, which spans over 33,000 square miles and includes the entire span of both I-REN counties. Establishing the entirety of both counties as within the greater Los Angeles Area means that many communities are not considered geographically hard to reach, despite requiring lengthy drive times for qualified contractors to commute to these locations.

[75] D.23-06-055 (p 49-54 and COL 33)

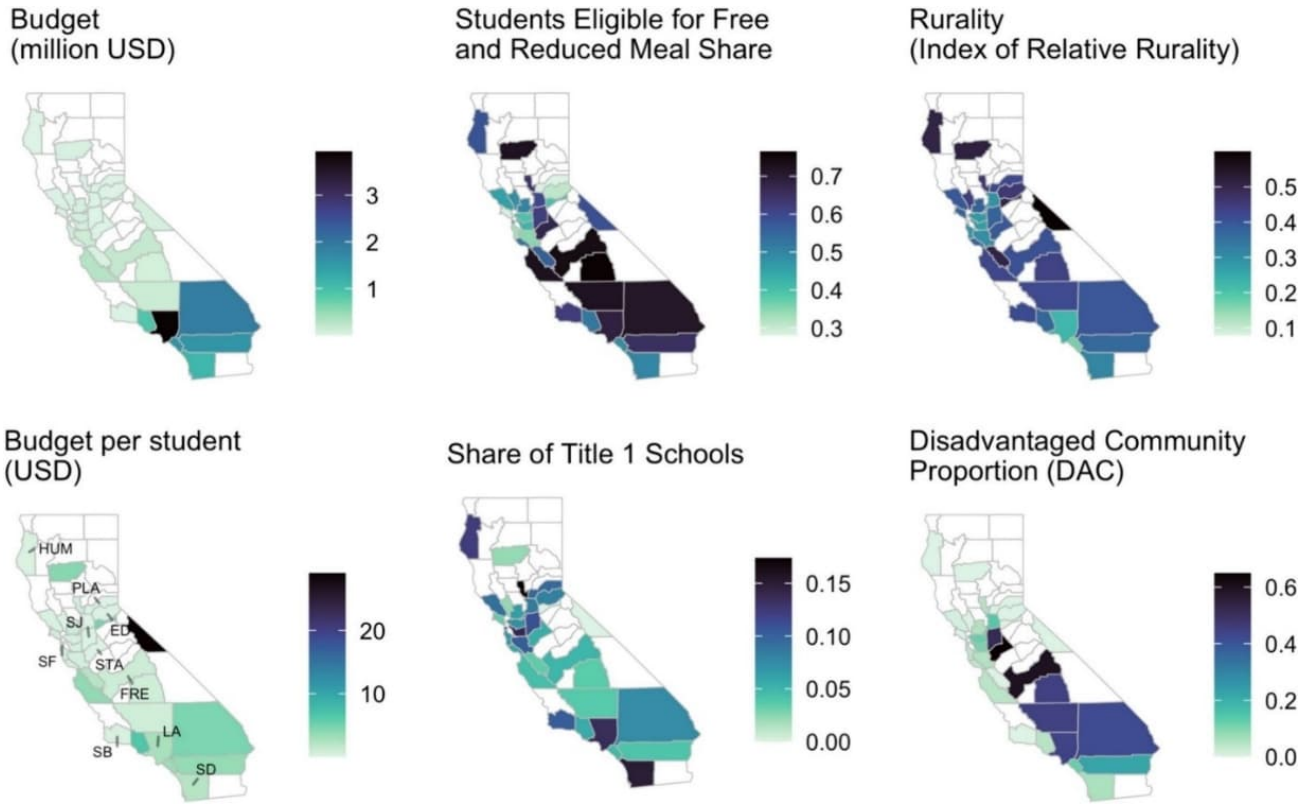
In the most recent update to the HTR definition, CPUC established that for the public sector, local government customers must meet the geographic criterion to be considered HTR, without additional pathways to qualify.

I-REN public sector ratepayers serve many HTR residential and small business customers, whether the local government entity itself meets the geographic HTR criteria, and the public sector agencies themselves face significant barriers in accessing EE due to their distance from metro areas, limited staff capacity, and lack of awareness of EE.

A recent UC Santa Barbara study shows that the largest predictor of total and per capita energy efficiency funding for local governments is rurality, with spending on energy efficiency programs in these counties being lower than average.[76] Considering the economic hardship and need for investment in the Inland Empire, I-REN is proposing a re-evaluation of the geographic criterion for HTR, so that public sector ratepayers in the I-REN region, many of which are located far from urban centers, are recognized appropriately as geographically hard to reach.

[76] Michelle Le, Sydney Litvin, Atherv Gole, Audrey Meiman, Austin Covey, Nathaniel Villa, Measrainsey Meng, Tatum Katz, Ranjit Deshmukh, Inequity in public sector energy efficiency? Explaining disparities in program budgets in California, United States, Energy Research & Social Science, Volume 114, 2024, 103590, ISSN 2214-6296, https://doi.org/10.1016/j.erss.2024.103590.

Figure 34: I-REN Public Sector EE Inequities



Source: [Inequity in public sector energy efficiency? Explaining disparities in program budgets in California, United States - ScienceDirect]