

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF
CALIFORNIA**

Application of Southern California Regional
Energy Network for Approval of 2024-2031
Energy Efficiency Business Plan and 4-Year
Portfolio Plan.

(#940)

Application No. 22-XX-XXX

APPLICATION OF
SOUTHERN CALIFORNIA REGIONAL ENERGY NETWORK (CPUC #940) FOR
APPROVAL OF SOCIALREN'S 2024-2031 STRATEGIC BUSINESS PLAN AND
SOCALREN'S ENERGY EFFICIENCY 2024-2027 PORTFOLIO PLAN

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For The Southern California Regional Energy
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March 4, 2022

Table of Contents

I. INTRODUCTION.....	1
II. BACKGROUND.....	2
III. OVERVIEW OF SOCALREN’S ENERGY EFFICIENCY APPLICATION AND TESTIMONY.....	3
A. Exhibit 1: 2024-2031 Strategic Business Plan.....	4
1. Chapter 2: SoCalREN’s Energy Efficiency Vision For California, 2024-2031.....	4
2. Chapter 6: SoCalREN’s 8-Year Portfolio Budget.....	5
3. Chapter 10: Policy Recommendations.....	6
B. Exhibit 2: 2024-2031 Portfolio Plan.....	7
1. Chapter 1: Four-Year Portfolio Summary.....	7
2. Chapter 2: Forecast Methodology.....	8
3. Chapter 3: Portfolio Segmentation Strategy.....	8
C. Exhibit 3: SoCalREN’s Responses, Pursuant to Energy Division Template.....	9
1. Chapter 1: SoCalREN’s Energy Efficiency 2024-2031 Application Tables, Pursuant to Energy Division Template.....	10
2. Chapter 2: SoCalREN’s Energy Efficiency 2024-2027 Supplemental Budget Narrative Information, Pursuant to Energy Division Template.....	10
D. Exhibit 4: SoCalREN Energy Efficiency 2024-2027 Implementation Plans.....	10
IV. COMPLIANCE WITH THE COMMISSION’S RULE OF PRACTICE AND PROCEDURE.....	11
A. Statutory Authority - Rule 2.1.....	11
B. Legal Name and Principal Place of Business - Rule 2.1(a).....	11
C. Correspondence and Communications - Rule 2.1(b).....	11
D. Categorization – Rule 2.1 (c).....	11
E. Need for Hearing – Rule 2.1 (c).....	11
F. Issues to be Considered – Rule 2.1 (c).....	12
G. Proposed Schedule - Rule 2.1 (c).....	13
V. CONCLUSION AND REQUEST FOR COMMISSION ORDERS.....	15

Exhibit 1 – SoCalREN 2024-2031 Strategic Business Plan

Exhibit 2 – SoCalREN Energy Efficiency 2024-2027 Portfolio Plan

Exhibit 3 – SoCalREN’s Responses, pursuant to Energy Division Template

Exhibit 4 – SoCalREN Program Implementation Plans

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Regional Energy Network for Approval of 2024-2031 Energy Efficiency Business Plan and 4-Year Portfolio Budget Request.

(#940)

Application No. 22-XX-XXX

APPLICATION OF SOUTHERN CALIFORNIA REGIONAL ENERGY NETWORK (CPUC #940) FOR APPROVAL OF SOCALREN’S 2024-2031 STRATEGIC BUSINESS PLAN AND SOCALREN’S ENERGY EFFICIENCY 2024-2027 PORTFOLIO PLAN

I. INTRODUCTION

Pursuant to, and in accordance with, Decision (D.)21-05-031¹ and the Administrative Law Judge’s R.13-11-005 Procedural Email Providing Guidance on Spreadsheets to be Included in Portfolio Applications,² Southern California Regional Energy Network (SoCalREN) respectfully submits this application for approval of its 2024-2031 Strategic Business Plan and 2024-2027 Energy Efficiency Portfolio Plan.

SoCalREN requests that the California Public Utilities Commission’s (Commission or CPUC) approve a budget cap of \$582.2 million for 2024 through 2031, which includes two four-year portfolio cycles: 2024-2027 and 2028-2031.³ The Application consists of SoCalREN’s 2024-2031 Strategic Business Plan (Exhibit 1), SoCalREN’s Energy Efficiency 2024-2027 Portfolio Plan

¹ D.21-05-031, p. 81, Ordering Paragraph (OP) 5.

² R.13-11-005. Administrative Law Judge's Procedural Email Providing Guidance on Spreadsheets to be Included in Portfolio Applications. February 14, 2022.

³ D.21-05-031, pp. 29-30.

(Exhibit 2), SoCalREN's Responses, pursuant to Energy Division Template (Exhibit 3), and SoCalREN's Energy Efficiency 2024-2027 Program Implementation Plans (Exhibit 4).

II. BACKGROUND

In D.21-05-031, the Commission adopted major policy changes related to energy efficiency goals, metrics, portfolio segmentation, cost-effectiveness requirements, and revised processes in which portfolios shall be applied for.⁴ In addition, the decision discussed school energy efficiency COVID-19 requirements set to expire at the end of 2023, and provided direction "on the inclusion of refrigerants with low global warming potential in the energy efficiency portfolios."⁵

Specific to the revised portfolio processes, the Commission modified the energy efficiency portfolio process such that each energy efficiency portfolio administrator is required to file an eight-year strategic business plan and a four-year detailed program portfolio.⁶ These changes were prompted by stakeholder comments regarding a motion filed by the Natural Resources Defense Council (NRDC). The NRDC Motion included a California Energy Efficiency Coordinating Committee Energy Efficiency (CAEECC) Portfolio Processes Working Group Report (CAEECC Proposal).⁷ The CAEECC Proposal had several suggested changes or improvements to the rolling portfolio process. Specifically, it recommended the length of each program cycle, the budget authorization process, setting of savings goals and targets for program

⁴ D.21-05-031, p. 3.

⁵ Ibid.

⁶ D.21-05-031, pp. 81-82, OP 5.

⁷ R.13-11-005, *The NRDC Motion Seeking Commission Ruling and Comment Period on the CAEECC Proposal for Improvements to the Energy Efficiency Portfolio and Budget Approval Process Working Group Report*. April 24, 2020. Attachment A.

administrators, flexibility to make program changes as well as cost-effectiveness.⁸ In D.21-05-031, OP 6, the Commission required portfolio administrators use a template developed and maintained by Commission staff for the eight-year strategic plan and four-year portfolio plan applications.⁹ On October 20, 2021, Energy Division distributed its *Energy Division 2024-2031 Business Plan Templates* (Energy Division template) that included an outline for the narrative portions, attachment tables, and supplemental budget information.¹⁰

SoCalREN prepared this strategic business plan and portfolio plan in compliance with D.21-05-031 and the Energy Division templates. In addition, SoCalREN developed its strategic business and portfolio plan with stakeholder engagement. SoCalREN looks forward to engaging with a diverse range of stakeholders and serving all its customers as it implements and refines its energy efficiency portfolio.

III. OVERVIEW OF SOCALREN'S ENERGY EFFICIENCY APPLICATION AND TESTIMONY

Concurrent with the filing of this Application, SoCalREN is serving written direct testimony supporting its proposals on the service list in (1) Order Instituting Rulemaking Concerning Energy Efficiency Rolling Portfolios, Policies, Programs, Evaluation, and Related Issues (R.) 13-11-005 (Energy Efficiency OIR); (2) prior consolidated energy efficiency business plan applications (A.17-01-013, et al); and Application of Pacific Gas and Electric Company for Approval of 2024-2031 Energy Efficiency Business Plan and 2024-2027 Portfolio

⁸ NRDC Motion, Attachment A

⁹ D.21-05-031, p. 82, OP 6.

¹⁰ R.13-11-005, Energy Division's Notice of Energy Efficiency 2024-2031 Business Plan Templates. October 20, 2021.

Plan (A.22-02-005) through a notice of availability. As discussed below, SoCalREN’s application data tables are publicly available via the California Energy Data and Reporting System (CEDARS).

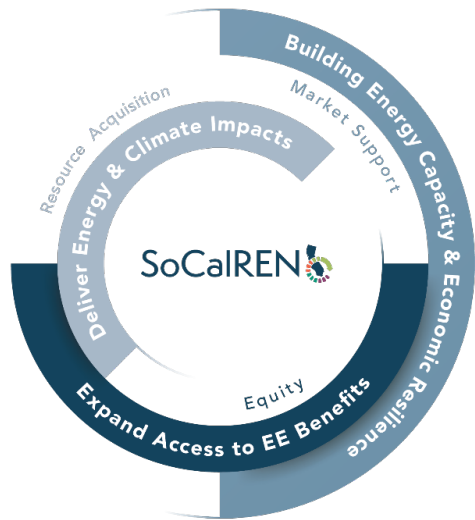
A. Exhibit 1: 2024-2031 Strategic Business Plan

In Exhibit 1, SoCalREN presents its energy efficiency strategic business plans which details its vision for energy efficiency in California, annual portfolio budgets, segment strategies, sector strategies, and recommendations for new or modified energy efficiency policy. Exhibit 1 addresses the long term portfolio for years 2024-2031 and provides the underpinning for SoCalREN’s energy efficiency portfolio for 2024-2027 as presented in Exhibit 2. Exhibit 1 has multiple chapters with high level detail. A few key chapters have been summarized below in brief.

1. Chapter 2: SoCalREN’s Energy Efficiency Vision For California, 2024-2031

Chapter 2 presents SoCalREN’s energy efficiency vision for the state of California for 2024- 2031 and describes SoCalREN’s goals, objectives, and strategies to achieve that vision. SoCalREN’s vision is one in which communities are actively shaping a safe, secure, resilient, and affordable clean energy future. As well as strengthening California’s capacity to achieve its ambitious decarbonization goals through a portfolio of programs framed by its core values to deliver energy and climate impacts, build energy capacity and economic resilience, and expand energy efficiency (EE) access and benefits to underserved and hard-to-reach communities. See Figure 1 for a summary of these core values, goals, objectives and outcomes and Exhibit 1, Chapter 2 for detail.

Figure 1. SoCalREN’s Core Values – Goals and Objectives



SoCalREN’s portfolio delivers energy and climate impacts, builds energy capacity and economic resilience, and expands access to energy efficiency

Core Values/Goals	Portfolio Objectives and Outcomes	Segment	Outcomes
DELIVER ENERGY AND CLIMATE IMPACTS	<i>Supporting activities with trackable energy savings and GHG reductions within the SoCalREN service area that contribute to local and state climate or sustainability goals. Increased energy & GHG reductions</i>	RESOURCE ACQUISITION	Increased energy and GHG reductions.
BUILD ENERGY CAPACITY & ECONOMIC RESILIENCE	<i>Building long-term knowledge and skills for public agencies, contractors, and transition age youth through WE&T that leads to energy competency, policies or other infrastructure & helping local communities build long-lasting, strong, and self-sufficient economies.</i>	MARKET SUPPORT	Increased energy capacity, competency, and economic resilience.
EXPAND ACCESS TO EE BENEFITS	<i>Expanding access to energy resources to enhance carbon reduction opportunities and other environmental outcomes for hard-to-reach markets including disadvantaged communities, rural areas, and underserved communities. Underserved communities gain increased access to EE benefits.</i>	EQUITY	Underserved communities gain increased access to EE benefits.

2. Chapter 6: SoCalREN’s 8-Year Portfolio Budget

In Chapter 6, SoCalREN presents its annual projected portfolio forecast budgets that sum to its eight-year budget cap request and its forecasts for savings, cost-effectiveness, and TSB through 2031. SoCalREN's is forecasting a budget cap for 2024-2031 of approximately \$582.2

million. This budget reflects a long term priority to meet market gaps, build EE capacity within the energy industry and serve more hard-to-reach (HTR)/vulnerable communities that will help reduce the current inequities in environmental justice. For 2024-2031, SoCalREN forecasts to achieve a Total Resource Cost (TRC) ratio for its resource acquisition segment of 0.73 and a total cumulative TSB of approximately \$339,622,772. Please see Exhibit 1, Chapter 6 for further details.

3. Chapter 10: Policy Recommendations

Chapter 10 presents SoCalREN's proposals for policy modifications to support SoCalREN's Exhibit 1 and 2. SoCalREN proposes four policy changes to enable energy efficiency portfolios of the future. Among other things, these changes are meant to drive deeper energy savings, allow more innovation and support decarbonization. These policy changes include:

- 1) Expanding strategic energy management (SEM) strategies to the Public Sector.
- 2) Expanding the Hard-To-Reach (HTR) definition to include Public Agencies.
- 3) Confirm that Normalized Meter Energy Consumption (NMEC) methods can be applied to all non-buildings including all energy-using public facilities and infrastructure.
- 4) Confirm that non-investor owned utility program administrators are allowed to engage in all appropriate IDSM activities when engaging a customer to implement energy efficiency measures.

See Exhibit 1, Chapter 10 for more details.

B. Exhibit 2: 2024-2031 Portfolio Plan

Exhibit 2 presents SoCalREN's four-year portfolio plan (2024- 2027) for its energy efficiency programs. SoCalREN's strategic business plan described in Exhibit 1 is the direct link and foundation for SoCalREN's first four-year portfolio plan cycle. Exhibit 2 includes eight chapters that present SoCalREN's 2024-2027 portfolio plan:

- Four Year Portfolio Summary
- Forecast Methodolgy
- Portfolio Segmentation Strategy
- Portfolio Market Sector Strategies
- Portfolio Strategies
- Portfolio Management
- Evaluation, Measurement, and Verificaiton
- Portfolio Costs and Committed Funds

A few key chapters are summarized below. For full details on each chapter listed above please see Exhibit 2.

1. Chapter 1: Four-Year Portfolio Summary

Chapter 1 presents an overall summary of SoCalREN's 2024-2027 portfolio plan, which is the first four-year period of the eight-year cycle. SoCalREN's portfolio plan is the tactical implementation that will proceed to support the long term outcomes provided in Exhibit 1, Chapter 2. In addition, SoCalREN discusses in detail how it plans to reach its goals, make a meaningful impact for those facing the most inequities and drive deeper energy savings during the first four-year cycle.

Pursuant to the Energy Division template, Chapter 1 also includes its application summary budget tables, including SoCalREN's 2024-2027 annual budget and total system benefit forecast:

Table 1. SoCalREN 4-Year Annual Budget and TSB Forecast

	2024	2025	2026	2027	Total
Budget Request	\$41,641,336	\$52,692,018	\$56,739,432	\$65,948,691	\$217,021,477
Total System Benefits	\$14,397,271	\$24,835,485	\$30,288,042	\$39,172,503	\$108,693,301

2. Chapter 2: Forecast Methodology

Chapter 2 presents SoCalREN’s EE portfolio budget and forecast methodology for 2024-2027. In compliance with D.21-05-031, SoCalREN discusses its zero-based budgeting approach that identifies forecast expenses by cost category and functional group category before including them in the forecast. SoCalREN provides a breakdown of forecast expenditures by cost category which directly tie to chapter one’s forecast benefits via quantitative contributions toward its portfolio energy savings goals.

SoCalREN is requesting approximately \$217 million for its total 2024-2027 budget to implement its EE portfolio. The annual budget request between 2024-2027 will assist SoCalREN to meet its forecasted savings goals as well as its forecasted metric targets over the next four-year application cycle.

Chapter 2 also discusses program modifications from SoCalREN’s 2023 portfolio and explains how SoCalREN distributes its portfolio administrator costs between portfolio administration and program implementation. See Exhibit 2, Chapter 2 for more detail.

3. Chapter 3: Portfolio Segmentation Strategy

In compliance with D.21-05-031 and the ED template, SoCalREN presents its strategy for portfolio segmentation for 2024-2027. Prior to 2022, energy efficiency programs were divided into two program types: resource and non-resource. D.21-05-031 created three portfolio segment types: resource acquisition, market support, and equity. Chapter 3 discusses how SoCalREN proposes to categorize each program in its portfolio and the logic for determining each program's categorization.

SoCalREN will offer a balanced portfolio to support long-term value of programs for which the primary focus is not only to achieve energy savings, but to help underserved communities, support equity goals, enable long-term market success, or to channel opportunities toward resource programs. Through a symbiotic relationship, all three segment categories will work together to accomplish the SoCalREN's vision in which communities are actively shaping a safe, secure, resilient, and affordable clean energy future.

SoCalREN's 2024-2027 portfolio budget allocates 30% of its resources to the equity segment, 32% to the market support segment, 37% to resource acquisition (RA), and 1% to codes and standards enhanced compliance. For further details on this segmentation allocation and rationale please see Exhibit 1 Chapter 3.

C. Exhibit 3: SoCalREN's Responses, Pursuant to Energy Division Template

Pursuant to Energy Division guidance on 2024 Applications and templates, SoCalREN includes data tables and supplemental budget information.¹¹ The data tables and the supplemental budget information are based on similar tables that have been historically included as "Attachments" respectively, to portfolio administrators' annual budget advice letters.

¹¹ Ibid.

1. Chapter 1: SoCalREN’s Energy Efficiency 2024-2031 Application Tables, Pursuant to Energy Division Template.

In Chapter 1, SoCalREN presents its energy efficiency 2024-2031 application data tables in spreadsheet form. The data tables are updated to reflect Energy Division guidance and dates relevant to D.21-05-031. Pursuant to the ALJ February 14 Procedural Email, SoCalREN (1) files these spreadsheets via a uniform resource locator (url) link to a publicly available webpage where the files can be accessed and downloaded (Rule 1.9(d)), and (2) serves these publicly available spreadsheets as uploaded to CEDARS: <https://cedars.sound-data.com/filings/dashboard/SoCalREN/2024> (last accessed March 3, 2022).¹²

2. Chapter 2: SoCalREN’s Energy Efficiency 2024-2027 Supplemental Budget Narrative Information, Pursuant to Energy Division Template.

In Chapter 2, SoCalREN presents its energy efficiency 2024-2027 supplemental budget narrative information. The supplemental budget information is updated to reflect dates relevant to D.21-05-031.

D. Exhibit 4: SoCalREN Energy Efficiency 2024-2027 Implementation Plans

Pursuant to D.21-05-031, SoCalREN Exhibit 4 includes all implementation plans (IPs) for programs included and submitted for approval in SoCalREN’s four-year program portfolio. These include programs existing and newly proposed. All implementation plans have been developed based on the approved Energy Division implementation plan template. This level of IP information is being provided so the Commission and stakeholders have the necessary information to evaluate the portfolio segmentation proposals and decisions by SoCalREN, in evaluating its portfolio application.

¹² D.21-05-031, P. 81, OP 5.

IV. COMPLIANCE WITH THE COMMISSION’S RULE OF PRACTICE AND PROCEDURE

A. Statutory Authority - Rule 2.1

SoCalREN files this Application pursuant to Public Utilities Code Sections 451,454, 728, 729, 740.4, and 795, the Commission’s Rule of Practice and Procedure (Rules), D.21-09-037, D.21-05-031, D.18-05-041, D. 16-08-19, D.18-01-004, D.19-08-009, orders, and resolutions of the Commission.

B. Legal Name and Principal Place of Business - Rule 2.1(a)

Applicant’s legal name is Southern California Regional Energy Network. SoCalREN’s principal place of business is Los Angeles, California. Its post office address is 1100 North Eastern Avenue, Los Angeles, CA 90063-3200.

C. Correspondence and Communications - Rule 2.1(b)

All correspondence and communications regarding this application should be sent electronically to Minh Le at the email listed below.

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D. Categorization – Rule 2.1 (c)

SoCalREN proposes to characterize this Application as “rate setting” as defined in the Commission’s Rules of Practice and Procedure Rule 1.3(f) and Public Utilities Code §1701.1(c)(3).

E. Need for Hearing – Rule 2.1 (c)

SoCalREN’s proposals submitted herein and set forth in the supporting Exhibits

constitute a sufficient record for the Commission to rule on SoCalREN's Business Plan Application without the need for evidentiary hearings. SoCalREN believes that all interested parties can comment and express their views through written protests and comments. If the presiding officer determines that additional explanations by SoCalREN would assist the Commission to grant the requested relief, SoCalREN would tender its prepared testimony, as appropriate, and suggest that a workshop, rather than evidentiary hearing, be convened for that purpose. Although SoCalREN does not believe that workshops are needed, SoCalREN's proposed schedule in subsection F, below, can accommodate workshops and still lead to a Commission decision by June 30, 2023.

F. Issues to be Considered – Rule 2.1 (c)

The principal issues to be considered are whether:

- 1) SoCalREN's strategic business plan and portfolio plan complies with the elements listed in D.21-05-031, OP 5.
- 2) SoCalREN's Application, testimony, and workpapers complies with the Energy Division template pursuant to D.21-05-031, OP 6.
- 3) As described in Exhibit 1, Chapter 3, SoCalREN's inclusion of its strategy for low refrigerant GWPs in its energy efficiency portfolio complies with D.21-05-031, OP 16.
- 4) As described in Exhibit 1, SoCalREN's eight-year strategic business plan is just and reasonable and should be adopted.
- 5) SoCalREN's energy efficiency proposed policy changes described in Exhibit 1, Chapter 10 (including its Appendix B as incorporated by reference) are just and reasonable and should be adopted.

- 6) As described in Exhibit 1, Chapter 6 and Exhibit 2, Chapter 2, SoCalREN's zero- based budgeting approach, were used in creating the forecast for its 2024-2027 portfolio plan budget, complies with D.21-05-031, COLs 21, 22 and OP 8.
- 7) SoCalREN's portfolio plan budget, as described in Exhibit 2, Chapter 2 is just and reasonable and should be adopted.
- 8) SoCalREN's segmentation strategy, as described in Exhibit 2, Chapter 3, complies with D.21-05-031, OP 2, is just and reasonable, and should be adopted.
- 9) SoCalREN's proposed allocation of budget to the market support and equity segments in its 2024-2027 portfolio plan, as described in Exhibit 2, Chapter 3, complies with D.21-05-031, OP 4, is just and reasonable, and should be adopted.
- 10) SoCalREN's sector strategies as described in Exhibit 2, Chapter 4 are just and reasonable and should be adopted.
- 11) SoCalREN's portfolio management strategies as described in Exhibit 2, Chapter 6 are just and reasonable and should be adopted
- 12) SoCalREN's proposed approach to evaluation, measurement and verification as described in Exhibit 2, Chapter 7, is just and reasonable and should be adopted.

G. Proposed Schedule - Rule 2.1 (c)

SoCalREN does not believe hearings are necessary and is open to participating in workshops with Commission staff, parties, and other stakeholders. SoCalREN anticipates several energy efficiency applications will be filed by other program administrators by March 4, 2022. Consistent with treatment of prior energy efficiency applications, SoCalREN presumes

that the Commission will consolidate these applications given similar issues and potential for overlap. Should hearings be required, SoCalREN proposes the following schedule, if the Commission consolidates all the portfolio administrators' respective applications:

Table 2: Proposed SoCalREN Business Plan Schedule

ACTIVITY	PROPOSED SCHEDULE
Application Filed	February 15, 2022
SoCalREN Application Public Webinar	March 9, 2022
CAECC Workshop	March 10, 2022
Protests or Response to SoCalREN Application	March 21, 2022
SoCalREN Reply to Protests	March 31, 2022
Prehearing Conference	April - May 2022
Workshops (if needed)	Summer 2022
Testimony of Interested Parties/ Deadline to file motion for evidentiary hearings	September 2, 2022
Rebuttal Testimony/Replies to Comments	October 3, 2022
Evidentiary Hearings (if needed)	November 1, 2022
Opening Briefs	December 2, 2022
Reply Briefs	December 21, 2022
Proposed Decision	June 2023
Final Decision	August 2023

On March 9, 2022, SoCalREN will be hosting a public webinar to discuss its business plan with stakeholders. SoCalREN will be prepared to answer stakeholder questions about this filing at this time. On March 10, 2022, SoCalREN plans to participate in a CAEECC meeting in

which SoCalREN intends to present on specific topics related to this filing, as requested by CAEECC. SoCalREN will also be prepared to answer any stakeholder questions at the CAEECC meeting.

SoCalREN is aware that there are other significant energy proceedings competing for Commission and intervenor resources. SoCalREN is committed to working with parties to develop a schedule for this case. SoCalREN plans to meet and confer with parties regarding the proposed schedule with the goal of jointly proposing a mutually acceptable schedule at the pre-hearing conference.

V. CONCLUSION AND REQUEST FOR COMMISSION ORDERS

SoCalREN respectfully request that the Commission issue appropriate orders:

- 1) Finding that SoCalREN's strategic business plan and portfolio plan complies with the elements listed in D.21-05-031, OP 5.
- 2) Finding that SoCalREN's Application, testimony, and workpapers complies with the Energy Division template pursuant to D.21-05-031, OP 6.
- 3) Finding that SoCalREN's eight-year (2024-2031) strategic business plan and is just and reasonable and should be adopted.
- 4) Finding that SoCalREN's 2024-2027 portfolio plan budget, is just and reasonable and should be adopted.
- 5) Finding that SoCalREN's energy efficiency proposed policy changes described in Exhibit 1, Chapter 10 (including its Appendix B as incorporated by reference) are just and reasonable and should be adopted.

- 6) Finding that SoCalREN's segmentation strategy, is just and reasonable, and should be adopted.
- 7) Finding that SoCalREN's proposed allocation of budget to the market support and equity segments in its 2024-2027 portfolio plan, is just and reasonable and should be adopted.

Respectfully submitted,

/s/ Minh Le

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For The Southern California Regional
Energy Network

Dated: March 4, 2022

VERIFICATION

I am an officer of the applicant, Southern California Regional Energy Network, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 4th day of March 2022, at Los Angeles, California.

/s/ Minh Le

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