

Proceeding: A.26-03-XXX

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Witnesses: Terry, Patricia
 Kullmann, Stephen
 Barba, Nancy
 Marchant, Margaret
 Carter, Emily

NREN
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APPENDIX A
STATEMENTS OF QUALIFICATION

**STATEMENT OF QUALIFICATIONS OF Stephen Kullmann
2028-2031 Portfolio Plan and 2032-2035 Business Plan**

Redwood Coast Energy Authority
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Description of responsibilities

I am the Director of Customer Programs with the Redwood Coast Energy Authority (RCEA), a Governing Partner and Lead Portfolio Administrator for the Northern Rural Energy Network (NREN). In this role, I lead program design and implementation for NREN Residential Sector Programs and support design and implementation for all other programs. Furthermore, as a Governing Partner representative, I participate in strategic planning, regulatory engagement, stakeholder communication, and general administration of NREN. I acted as a joint author and reviewer of the NREN 2028-2035 BPA, as well as the original 2024-2031 RuralREN and revised Northern RuralREN BPAs.

I also direct planning and implementation of RCEA's customer programs, including our PG&E Local Government Partnership, resiliency and IDSM efforts, and Community Choice Energy program offerings.

In addition, I previously lead implementation of RCEA's Elect-to-Administer Energy Efficiency non-residential resource acquisition program.

Summary of educational and professional background

I have been with RCEA since 2020. Prior to joining RCEA I worked as a Director of Infrastructure and Resilience with the Blue Lake Rancheria, a Federally Recognized Indian Government and Climate Champion with responsibilities including planning, developing, funding, and implementing water resource, energy, and workforce education projects on Tribal lands. Prior to joining the Blue Lake Rancheria, I worked as the Natural Resources Director for the Wiyot Tribe, another Federally Recognized Tribal Government, leading multiple initiatives including energy, water resources, brownfields, and fisheries projects.

Master of Science in Environmental Systems with an Energy focus from Humboldt State University in May 2009. Bachelor of Arts with honors in English from Rutgers University in 1989.

**STATEMENT OF QUALIFICATIONS OF PATRICIA TERRY
2028-2031 Portfolio Plan and 2032-2035 Business Plan**

633 Third St, Eureka, CA 95501

Description of responsibilities

I am a Senior Portfolio Manager with Redwood Coast Energy Authority (RCEA), which is the Lead Portfolio Administrator for the Northern California Rural Regional Energy Network (Northern Rural Energy Network or NREN). In this role, I manage the program portfolio including overseeing the program teams, monitoring budgets and goal achievement, general administration, and regulatory compliance and reporting. My work also included the development of the 2028-2035 Business Plan Application.

I previously supported the planning of the residential and commercial resource programs and technical support for the Cost Effectiveness Tests (CETs) for the 2024-2027 Business Plan Application for the Rural REN. In addition, I supported RCEA's 2019 advice letter electing to administer energy efficiency programs as a CCA and managed the program portfolio after approval. I was also the program manager for RCEA's non-residential energy efficiency program from 2015 to 2023.

Summary of educational and professional background

I have been with Redwood Coast Energy Authority since 2011. Prior to joining Redwood Coast Energy Authority, I worked as a Lecturer/Academic Advisor with Cal Poly Humboldt (formerly Humboldt State University), with responsibilities including teaching Physical Oceanography, Oceanography Lab, Energy Systems, and Engineering Thermodynamics as well as serving as an academic advisor in Environmental Science.

Master of Science in Applied Ocean Sciences at Scripps Institution of Oceanography, University of California, San Diego, May 2003

Bachelor of Science in Engineering, Engineering Physics, University of Michigan, Ann Arbor, May 2002

STATEMENT OF QUALIFICATIONS OF NANCY BARBA
2028-2031 Portfolio Plan and 2032-2035 Business Plan

1075 Serpentine Lane, Suite B, Pleasanton, CA 94566-4809

Description of responsibilities

I am a Portfolio Director with Frontier Energy, responsible for designing and developing portfolios and programs for regional energy networks and community choice aggregators. The work includes strategic planning, creating sector frameworks, identifying goals and energy savings forecasting. Additionally, my team provides strategic funding consulting to local governments and aids in securing funding opportunities from ratepayer and non-ratepayer sources. As part of my responsibilities, I manage programs, oversee stakeholder engagement, develop program pipelines, ensure accurate regulatory reporting and advise on community outreach.

I oversee the development of cost effectiveness calculations and the populating of regulatory reporting tables, and ensure technical guidance is current and appropriate for the proposed sectors and segments.

For the Northern California Rural Regional Energy Network (Northern Rural Energy Network or NREN), I oversee and consult on portfolio strategic framework, program design, development activities, budgets, metrics, and energy savings estimates. I advise on regulatory matters, including proceedings, support California Energy Efficiency Coordinating Committee (CAEECC) interactions, filing comments, and support negotiating the regulatory landscape.

Previously, I worked with Redwood Coast Energy Authority (RCEA), the lead administrator for NREN, to support them as a community choice aggregator (CCA). I have supported dozens of successful filings of annual budget advice letters, program implementation plans, joint cooperation memorandums, and other required regulatory documents for program administrators.

Summary of educational and professional background

I have been with Frontier Energy since 2010. Previously, I was the Director, Sustainable Works, Residential Green Programs for the City of Santa Monica.

Bachelor of Science, California State University, Long Beach.

LEED, Accredited Professional; Certified Green Building Professional; Certified GreenPoint Advisor.

STATEMENT OF QUALIFICATIONS OF MARGARET MARCHANT
2028-2031 Portfolio Plan and 2032-2035 Business Plan

1075 Serpentine Lane, Suite B, Pleasanton, CA 94566-4809

Description of responsibilities

I am a Senior Program Manager with Frontier Energy, Inc., which provides technical and regulatory consulting services to the Northern California Rural Regional Energy Network (Northern Rural Energy Network or NREN). In this role, I lead Frontier Energy's contributions to NREN's program funding application exhibit documents, such as the Strategic Business and Portfolio plan. The work includes development of strategic approaches to portfolio, segment, and sector strategies for NREN's portfolio.

Previously I supported NREN's business plan approved in 2025 as well as NREN's Joint Cooperation Memorandum (JCM) with PG&E. On a regular basis, I provide regulatory support for NREN including consulting on portfolio framework, program design, and all relevant regulatory matters.

I also served as lead author of the Inland Regional Energy Network's (I-REN) 2022-2027 program funding application, with responsibilities that included program ideation, market research, and development of strategic interventions for the public sector, codes and standards, and workforce education and training energy efficiency offerings. I have also supported Tri-County Regional Energy Network (3C-REN) with their 2024-2031 funding application, with responsibilities that included program ideation and development of strategic interventions for 3C-REN's agricultural and cross-cutting sectors – commercial and public facilities offerings, as well as development of strategic approaches to the equity and market support segments of 3C-REN's portfolio.

In addition, I have supported Clean Power San Francisco, San Jose Clean Energy, and Ava Community Energy (formerly East Bay Community Energy) with program funding applications for energy efficiency offerings.

Summary of educational and professional background

I have been with Frontier Energy since 2008. Prior to joining Frontier Energy, I worked as a legislative aide to a state legislator in the Texas House of Representatives with responsibilities including constituent engagement and policy brief preparation.

Bachelor of Arts (with departmental honors), Plan 1 Liberal Arts Honors Program, University of Texas, Austin, May 2007.

STATEMENT OF QUALIFICATIONS OF EMILY CARTER
2028-2031 Portfolio Plan and 2032-2035 Business Plan

1075 Serpentine Lane, Suite B, Pleasanton, CA 94566-4809

Description of responsibilities

I am a Program Consultant with Frontier Energy, Inc. which provides technical and regulatory consulting services to the Northern California Rural Regional Energy Network (Northern Rural Energy Network or NREN). In this role, I support Frontier Energy's contributions to NREN's program funding application exhibit documents, such as the 2028-2031 Portfolio Plan and 2032-2035 Business Plan. The work includes development of program, segment, sector, and portfolio strategies for NREN's portfolio, along with technical support for Cost Effectiveness Tests (CETs) required for this application.

I supported NREN's Joint Cooperation Memorandum (JCM) efforts with PG&E following NREN's previous business plan application. I also supported the development of NREN's Implementation Plans as their programs began in 2025. I also worked on NREN's Mid-Cycle Advice Letter (MCAL) in 2025 and provided technical support for the CETs required for the MCAL. On a regular basis, I provide technical and regulatory support for NREN's regulatory and reporting requirements.

In addition, I provide regulatory support for the Inland Regional Energy Network (I-REN) and lead their Evaluation, Measurement, and Verification (EM&V) efforts. Previously, I also supported multiple Community Choice Aggregators (CCA) with their Elect to Administer (ETA) Applications.

Summary of educational and professional background

I have been with Frontier Energy since 2024. Prior to joining Frontier, I worked as an Energy Modeling Analyst with Quality Built, with responsibilities including energy design analysis, Title 24 compliance checks, and use of CBECC-Res and EnergyPro software.

Master of Science (with honors), Environmental Policy and Management, University of Denver, June 2023.

Bachelor of Science, Biology, University of California, Los Angeles, June 2017.

APPENDIX B
SUPPLEMENTAL BUDGET INFORMATION NARRATIVE

ATTACHMENT B

Supplemental Budget Information

**Prepared in support of the 2026 Business Plan Application in accordance with CPUC
Decision (D.) 21-05-031 and subsequent guidance governing Energy Efficiency
Business Plan Applications.**

**This attachment provides supplemental budget narrative information
supporting the Business Plan Application and associated BPA budget tables.**

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1. TURN and CAL PA invite the PAs to propose a common table format for this information. We don’t have anything specific in mind. Additionally, include a brief description of the method used by the PA to estimate the costs presented in the C.10 Table.

Attachment B

Approved Meet & Confer Document by Program Administrators, Office of Ratepayers and The Utility Reform Network

I. BACKGROUND:

Decision (D.) 21-05-031 established updated guidance for Energy Efficiency portfolio planning and Business Plan Application (BPA) submissions.

Consistent with this Commission direction, this narrative and the accompanying Attachment A tables provide supplemental budget information describing organizational structure, staffing, and cost allocation methodologies used to support implementation of the Energy Efficiency portfolio.

This information is intended to provide transparency into programs administrator organizational structure, cost drivers, and the allocation of labor and non-labor costs associated with implementation of the portfolio.

II. I. DESCRIPTION OF IN-HOUSE EE ORGANIZATIONAL STRUCTURE & ASSOCIATED COSTS

A. Narrative description of in-house departments/organizations supporting the PA's EE portfolio

1. Functions conducted by each department/organization

The Northern California Rural Regional Energy Network (also known as the Northern Rural Energy Network or NREN) is a collaboration between the Redwood Coast Energy Authority (RCEA), Sierra Business Council (SBC), County of Yolo (Yolo County), Lake Area Planning Council (LAPC), and the Mendocino Council of Governments (MCOG). RCEA, SBC, LAPC, and MCOG each

provide a representative to serve as the Governing Partners of NREN. The Governing Partners are responsible for the governance and strategic planning of NREN.

RCEA is the Lead Portfolio Administrator and manages the administration of the NREN portfolio as well as implementation of programs. RCEA is the program lead for the Home Energy Updates and Non-Residential Energy Services programs and supports implementation of the Home Energy Advisors and Public Energy Services across the region.

SBC is the NREN region-wide Marketing Lead and is the program lead for the Energy Upgrade Financing and Home Energy Advisors programs. SBC also supports implementation of the Public Energy Services and Non-Residential Energy Services programs throughout the NREN territory.

LAPC is the program lead for the Public Energy Services program.

MCOG is the program lead for the Energy Careers Education and Training program.

Each Partner is also responsible for local delivery of the programs within their counties, and for SBC across the 14 Sierra Nevada counties.

2. Energy Efficiency Management Structure and Org Chart

The Governing Partners are responsible for high level strategy of the REN and oversee the Lead Portfolio Administrator which includes the roles of Administrative Lead, Portfolio Lead, and Marketing Lead. The Portfolio Lead is responsible for the program portfolio and manages the Program Teams for the six NREN programs.

Each Program Team has a Program Lead from one of the partner organizations. The Program Lead facilitates the development and implementation of the program. Development and implementation of the program is done by one or more of the partner organizations and then each partner is responsible for boots on the ground outreach and/or program delivery within their county or counties.

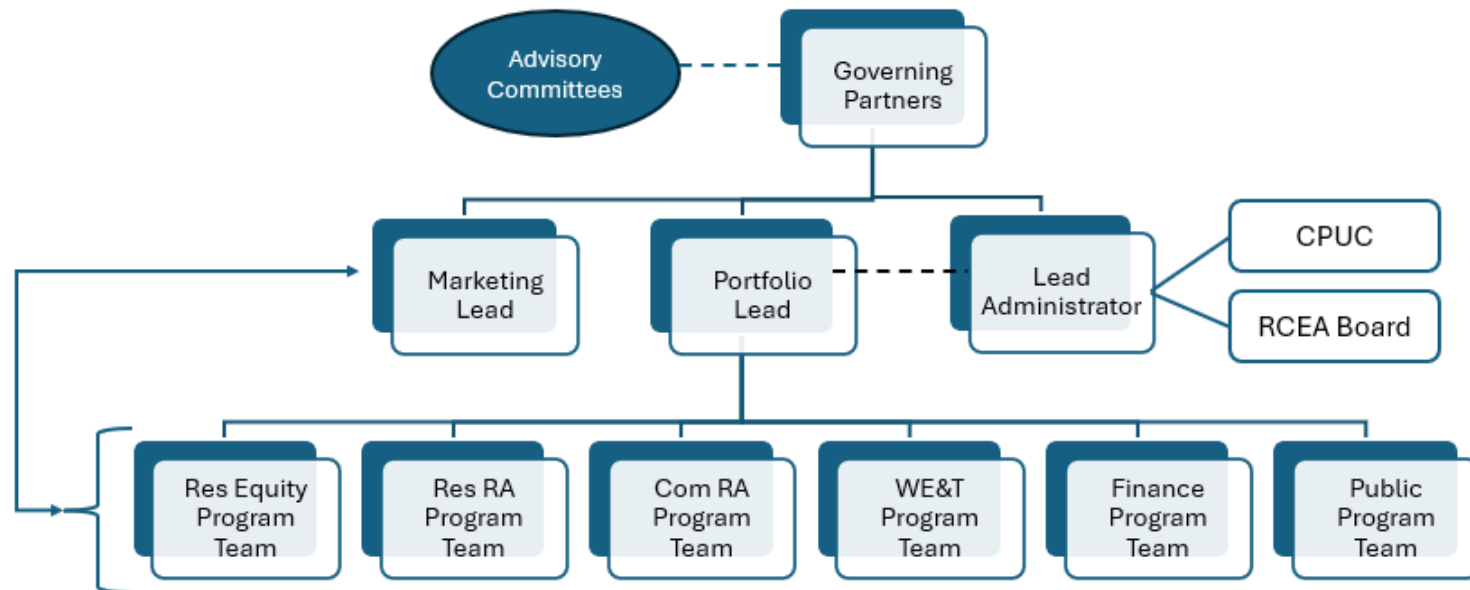


Figure 1: Revised Organizational Structure

3. Staffing needs by department/organization, including current and forecast for 2026-2027, as well as a description of what changes are expected between 2028-31 or why it's impossible to predict beyond 2026, if that's the PA's position.

NREN's staffing are expected to grow from 2026-2027 into the 2028-2031 program cycle. This growth is directly tied to program implementation after program launch, deeper outreach efforts, and compliance with regulatory requirements. Additionally, NREN's portfolio is expanding to new counties and growing their programs, requiring front-loaded investment. In NREN's first program cycle, reaching into counties that have historically been underserved was a proud accomplishment. In this next program cycle, NREN intends to continue expanding that reach and scaling programs particularly in the Northern Sierra counties. Additionally, NREN will expand into two new counties, Trinity and Yolo, and explore expansion into four beyond that - Colusa, Glenn, Tehama, and Shasta. This expansion requires additional staffing, training, and local partnerships. Start-up and expansion costs such as hiring, training, stakeholder engagement, and tribal outreach have been budgeted above steady-state levels. This growth requires higher implementation costs, especially for HTR and tribal communities.

There is a small amount of growth in staff in 2028 that is expected, then staffing is expecting to remain stable through 2031, as the expanded staffing will be sufficient to serve the larger territory and support mature program delivery. See table B below.

4. Non-program functions currently performed by contractors (e.g. advisory consultants), as well as a description of what changes are expected between 2028-31 or why it's impossible to predict beyond 2026, if that's the PA's position.

NREN's consultant engagements are directly tied to programmatic or portfolio-support activities authorized by the CPUC. NREN currently contracts with Frontier Energy to support portfolio-wide administrative, regulatory, and technical functions of NREN. No changes are expected to this support between 2028-2031. The scope of services is expected to remain stable and meet compliance requirements and effective portfolio administration.

5. Anticipated drivers of in-house cost changes by department/organization

NREN's in-house cost changes will be from essential staffing growth. RCEA anticipates a small amount of growth as NREN's lead administrator as programs mature in 2028 and expects to stabilize beyond that. SBC will grow to support expansion further into its 14-county territory. Expansion of services include intensive customer engagement and cross-program coordination. LAPC and MCOG will also add staff to support program growth initially. Because Yolo County was not part of NREN before 2028, NREN will staff up to support programs at that time and integrate NREN's programs into Yolo's region.

6. Explanation of method for forecasting costs

To establish the budgets for the equity programs, NREN estimated service levels and set internal Key Performance Indicators (KPIs) across the different regions that are tied to achieving the goals of the portfolio. Those achievements were then tied to the staffing levels and CBO partnerships needed to be able to reach those KPIs in the context of the factors listed in section (i). The cost of education and outreach activities, energy efficiency kits, and technical consultants were also included, using historic contract values and estimated escalation rates. To maximize adoption, incentives were set to bring the price of measures to low or no-cost, particularly for equity customers, and calculated for the forecasted portfolio of offerings.

Benefits from claimable measures, including TSB and energy savings, are calculated using the CET. Other benefits such as community awareness, customer education, and program reach are measured by number of services delivered such as kits, assessments, and educational events. The location of services and number of equity customers is also tracked to identify gaps that need to be filled.

Market support programs were similarly budgeted around the number and types of training and partnerships. Staff requirements were smaller and funds were allocated towards partnerships with local training organizations including community colleges, tribal training programs, and pre-apprenticeship programs. The benefits were measured through the number of programs developed, trainees, and funds going into the community from these programs.

B. Table showing PA EE “Full Time Equivalent” headcount by department/organization

Partner Organization	2026	2027	2028	2029	2030	2031
RCEA (Admin)	3.45	4.45	5.45	5.45	5.45	5.45
RCEA (Implementation)	10.5	10.8	11.2	11.2	11.2	11.2
SBC	8.10	8.13	12.49	12.24	13.04	13.24
Yolo	0	0	4.4	4.4	4.4	4.4
LAPC	3.3	3.3	5.23	5.22	5.22	5.22
MCOG	2.3	3.3	5.97	6.97	6.97	6.97

C. Table showing costs by functional area of management structure

Expense Type	Functional Group	Type (2)	2028	2029	2030	2031
Labor	Policy, Strategy, and Regulatory Reporting Compliance	Budget	\$997,575	\$1,139,468	\$1,202,392	\$1,267,590
Labor	Program Management	Budget	\$5,541,397	\$5,888,941	\$6,224,010	\$6,622,791
Labor	Engineering Services	Budget	\$ -	\$ -	\$ -	\$ -
Labor	Customer Application/Rebate/Incentive Processing	Budget	\$1,236,729	\$1,263,059	\$1,535,541	\$1,620,468

Expense Type	Functional Group	Type (2)	2028	2029	2030	2031
Labor	Customer Project Inspections	Budget	\$16,197	\$17,007	\$17,857	\$18,750
Labor	Portfolio Analytics	Budget	\$579,479	\$615,894	\$650,115	\$683,081
Labor	EM&V	Budget	\$ -	\$ -	\$ -	\$ -
Labor	ED Portfolio Oversight	Budget	\$ -	\$ -	\$ -	\$ -
Labor	ME&O (Local)	Budget	\$602,502	\$705,750	\$743,313	\$782,989
Labor	Account Management / Sales	Budget	\$1,793,212	\$1,878,641	\$2,022,283	\$2,174,371
Labor	IT	Budget	\$12,297	\$12,912	\$13,558	\$14,236
Labor	Call Center	Budget	\$ -	\$ -	\$ -	\$ -
Labor	Total	Budget	\$10,779,387	\$11,521,671	\$12,409,069	\$13,184,275
Non-Labor	Third-Party Implementer (as defined per D.16-08-019, OP 10)	Budget	\$ -	\$ -	\$ -	\$ -
Non-Labor	Local/Government Partnerships Contracts (3)	Budget	\$ -	\$ -	\$ -	\$ -
Non-Labor	Other Contracts	Budget	\$ -	\$ -	\$ -	\$ -

Expense Type	Functional Group	Type (2)	2028	2029	2030	2031
Non-Labor	Program Implementation	Budget	\$3,137,657	\$3,339,460	\$3,620,082	\$3,936,351
Non-Labor	Policy, Strategy, and Regulatory Reporting Compliance	Budget	\$290,000	\$298,400	\$307,952	\$316,864
Non-Labor	Program Management	Budget	\$282,300	\$295,195	\$308,751	\$325,899
Non-Labor	Engineering services	Budget	\$220,000	\$226,600	\$233,398	\$240,400
Non-Labor	Customer Application/Rebate/Incentive Processing	Budget	\$177,000	\$183,610	\$190,484	\$197,631
Non-Labor	Customer Project Inspections	Budget	\$ -	\$ -	\$ -	\$ -
Non-Labor	Portfolio Analytics	Budget	\$13,600	\$27,880	\$13,600	\$13,600
Non-Labor	EM&V	Budget	\$747,675	\$816,462	\$949,618	\$1,071,679
Non-Labor	ED Portfolio Oversight	Budget	\$ -	\$ -	\$ -	\$ -
Non-Labor	ME&O (Local)	Budget	\$433,920	\$458,395	\$500,428	\$526,964
Non-Labor	Account Management / Sales	Budget	\$100,000	\$103,000	\$106,090	\$109,273
Non-Labor	IT	Budget	\$130,000	\$133,900	\$137,917	\$142,055
Non-Labor	Call Center	Budget	\$ -	\$ -	\$ -	\$ -

Expense Type	Functional Group	Type (2)	2028	2029	2030	2031
Non-Labor	Facilities	Budget	\$ -	\$ -	\$ -	\$ -
Non-Labor	Incentives--(PA-implemented and Other Contracts Program Implementation) Programs	Budget	\$2,380,331	\$3,006,989	\$4,963,064	\$6,726,996
Non-Labor	Incentives--Third Party Program (as defined per D.16-08-019, OP 10)	Budget	\$ -	\$ -	\$ -	\$ -
Non-Labor	Total	Budget	\$7,912,483	\$8,889,891	\$11,331,385	\$13,607,712
Labor + Non-Labor	Total	Budget	\$18,691,870	\$20,411,562	\$23,740,453	\$26,791,987

1. Expenses broken out into labor, non-labor O&M (with contract labor identified) (* Note, in case of conflict, excel budget template will control.)

Table C above and Exhibit 4 – Tables 9 Portfolio FTE and Budget show NREN’s expenses broken out into labor and non-labor with contract labor identified. Table D below depicts the 4-year Portfolio Budget Forecast Summary for years 2028-2031. Per Commission guidance, in the event of any inconsistency between this supplemental budget information narrative and the Excel budget templates, the Excel budget templates shall be considered true.

D. Table D: 4-year Portfolio Budget Forecast Summary (2028-2031)

	2028	2029	2030	2031	Total
					(4 years)
Resource Acquisition Segment Budget	-	-	-	-	-
Market Support Segment Budget	2,476,669	2,628,904	2,745,368	2,869,889	10,720,829
Equity Segment Budget	15,467,526	16,966,196	20,045,468	22,850,418	75,329,609
Codes and Standards Budget	-	-	-	-	-
EM&V	747,675	816,462	949,618	1,071,679	3,585,435
ED Portfolio Oversight	-	-	-	-	-
Total Budget	18,691,870	20,411,562	23,740,453	26,791,987	89,635,872

1. Identify any capital costs

There are no capital costs included in NREN's budgets.

E. Table showing cost drivers across the EE organization

Table E below summarizes the cost drivers that will influence anticipated cost changes during the 2028-2031 cycle. NREN is accounting for inflation over the years at a realistic 5% per year rate. Otherwise, the principal driver of projected cost increases is the continued expansion and growth of program delivery.

Administrative and Organizational Cost Drivers

Administrative cost drivers vary across NREN’s partner organizations, RCEA, SBC, LAPC, MCOG, and Yolo County (starting in 2028), but generally include:

- **Labor Costs:** Adjustments to county-approved salary scales, benefits, and overhead rates as staff capacity expands to support HTR outreach, NMEC workpapers, public-sector engagement, and direct-install oversight.
- **Portfolio Scope & Regulatory Participation:** Increased regulatory obligations such as CPUC filings, Joint Cooperation Memo (JCM) processes, expanded EM&V participation, and growing reporting requirements tied to TSB, Equity KPIs, and census-tract–based metrics.
- **Procurement & Contracting:** Additional solicitations, contractor onboarding, and contract management activities associated with scaling workforce development, Finance products, DI programs, and public-sector services.
- **Data & Reporting Infrastructure:** Expanded IT, cybersecurity, and data-management needs to meet CPUC reporting requirements, NMEC data processing, mapping requirements, and rural census-tract tracking.

These factors will scale with NREN’s territory expansion and the increased complexity of serving rural customers, but are expected to stabilize after 2028 once staffing and systems are fully built out.

Implementation Cost Drivers

Implementation cost drivers are primarily tied to program delivery and include:

- Higher Per-Participant Delivery Costs: Rural outreach requires more staff time, in-home visits, repeated contact, and long-distance travel to dispersed households and small businesses.
- Program Participation Volume: As outreach expands into new counties and deeper into existing ones, participation increases will drive higher incentive costs, contractor oversight needs, and Energy Advisor workload.
- Program Design & Development: Ongoing refinement of Equity delivery, expansion of contractor cohorts, adjustments to incentive levels based on shifting equipment markets, and NMEC data analysis.
- Project Management: Increased staff and contractor time required for scoping, technical support, QA/QC, workforce coordination, permitting navigation, and direct assistance to rural customers and public agencies.
- Market Transformation & Workforce Investments: Continued investment in training rural contractors, building new trade-ally pipelines, and supporting tribal and community-based organizations, all of which are essential for long-term rural market transformation.

F. Table E: Cost drivers across the EE organization

Description	Budget increase (\$000)	% Increase
Added territory	\$5,549.44	14%
Inflation (5% per year)	\$15,422.19	39%
Increased staffing	\$10,509.12	27%
Non-Labor increase	\$1,420.14	4%
Increased Incentives	\$13,994.45	36%
<i>TOTAL</i>	<i>\$46,895.34</i>	

The primary drivers of cost increase to the portfolio budget include inflation, the addition of a new partner and territory, an expansion in reach of our services measured by increased KPIs and goals which lead to increases in staff, increases in non-labor costs, and increase in the incentive budget.

G. Explanation of allocation of labor and O&M costs between EE-functions and GRC-functions or other non-EE functions

- 1. When an employee spends less than 100% of her/his time on EE, how are costs tracked and recovered (e.g., on a pro rata basis between EE rates and GRC rates; when time exceeds a certain threshold, all to EE; etc.).**

As a non-IOU PA, NREN does not participate in General Rate Case (GRC) proceedings and therefore does not allocate labor costs between EE and GRC-related functions. All staff and consultant labor charged to NREN's portfolio is tied exclusively to the implementation, administration, regulatory compliance, reporting, outreach, technical assistance, and evaluation activities authorized

by the CPUC. Accordingly, NREN has no need to bifurcate labor costs across EE and non-EE functions; every hour billed by NREN staff or contractors directly supports Commission-approved portfolio activities.

NREN's labor costs are fully burdened and tracked at the partner agency, program, project, and/or activity level. Each NREN partner agency, including RCEA, SBC, MCOG, LAPC, and Yolo County, is treated as an individual cost center, with labor rates established according to each partner's approved salary schedules, benefit structures, and overhead policies.

NREN's Lead Portfolio Administrator, the Redwood Coast Energy Authority (RCEA), consolidates labor and non-labor expenditures across all implementing partners and consultants, including the technical, administrative, and regulatory work performed by Frontier Energy, NREN's primary support contractor. RCEA compiles and submits detailed monthly expenditure reports to PG&E, the fiscal agent for NREN, itemizing:

- Staff time by individual,
- Applicable labor/burden rates,
- Program and task assignment, and
- Budget category (e.g., administration, marketing, implementation, regulatory support, EM&V coordination).

Expense reporting uses a standardized format developed through coordination with PG&E to ensure transparency in operating budgets, current expenditures, outstanding commitments, and remaining portfolio balances. This structure allows NREN to maintain accurate, compliant tracking of all ratepayer funds while managing a geographically large, complex, multi-partner portfolio.

12. Describe the method used to determine the proportion charged to EE balancing accounts for all employees who also do non-EE work.

This provision is not applicable to NREN as NREN does not maintain EE balancing accounts as a non-IOU PA.

2. Identify the EE functions that are most likely to be performed by employees who also do non-EE work (e.g. Customer Account Representatives?)

Employees that do non-EE work have duties on the governance side of NREN. These employees are likely at the Executive Director level or Department Director level. All time billed to the NREN portfolio is tracked specifically to NREN's approved EE programs and activities.

3. How are burden benefit-related administrative and general (A&G) expenses for employees who work on EE programs recovered (EE rates or GRC rates)? **PG&E allocates these costs to EE pursuant to a settlement agreement with MCE and TURN, which was adopted in D.14-08-032.

This provision is not applicable to NREN as NREN is a non-IOU PA and does not recover costs through GRC rates. NREN does not allocate burden-related A&G expenses between EE and non-EE functions in that manner.

4. When EE and non-EE activities are supported by the same non-labor resources, how are the costs of those resources or systems allocated to EE and non-EE activities?

NREN tracks and codes activities at the program level. General O&M costs are factored into the fully burdened labor rates paid by each program. Thus, the overhead costs are paid appropriately by each program.

5. Identify the EE O&M costs that are most likely to be spread to non-EE functions as well as EE, if any

General O&M costs are factored into the fully burdened labor rates paid by each program. Thus, the overhead costs are paid appropriately by each program. There are no O&M costs intentionally spread between EE and non-EE functions.

III. BUDGET TABLES INCLUDING INFORMATION IDENTIFIED IN THE SCOPING MEMO

This section responds to the April 14, 2017 Scoping Memo and Ruling of the Assigned Commissioner and Administrative Law Judges in A.17-01-003 et al. and refers to the 2026 Business Plan Application in accordance with CPUC Decision (D.) 21-05-031. This section summarizes supplemental budget information consistent with CPUC guidance for Energy Efficiency Business Plan Applications and the associated BPA budget templates.

A. Attachment-A, “BPA Workbook – Portfolio Summary Tables”

The Scoping Memo requests:

“Present a single table summarizing energy savings targets, and expenditures by sector (for the six specified sectors). This table should enable / facilitate assessment of relative contributions of the sectors to savings targets, and relative cost-effectiveness.”

18. TURN and CAL PA invite the PAs to propose a common table format for this information.

NREN’s response is provided in the Portfolio Summary Table, included herein as Table G. This table presents energy savings targets by sector, budgeted expenditures by sector, and associated cost-effectiveness metrics where applicable.

Table G is designed to allow for simple comparisons across sectors and to support assessment of each sector’s contribution to overall portfolio savings and cost-effectiveness. This information is also available in Attachment-A, “BPA Workbook – Portfolio Summary Tables.”

B. Table G: NREN 2028-2031 Budget Savings by Sector

Year Must complete for all four years	Primary Sector	PA Spending Budget Request <i>Sum of (admin, M&O, DI Non- incentives, incentives)</i>	Net TSB	TRC	PAC	First Year Net KWH	First Year Net KW	First Year Net Therms	Lifecycle Net KWH	Lifecycle Net Therms	Lifecycle Net Electric CO2e	Lifecycle Net Gas CO2e
2028	Residential	6,787,098	636,138	0.23	0.24	-43,130	35	21,404	-872,564	21,404	-252	2,429
2028	Commercial	4,330,495	3,860,392	0.93	0.93	-162,081	211	190,481	-9,372,480	190,481	-1,589	13,744
2028	Cross-Cutting	3,199,809	0	0.00	0.00	0	0	0	0	0	0	0
2028	Public	2,296,352	0	0.00	0.00	0	0	0	0	0	0	0
2028	Portfolio Support	2,078,117	0	0.00	0.00	0	0	0	0	0	0	0
2028	TOTAL PORTFOLIO	18,691,870	4,496,531	0.23	0.24	-205,210	246	211,886	-10,245,045	211,886	-1,840	16,173
2029	Residential	7,567,475	1,113,159	0.34	0.35	-41,384	66	33,386	-744,965	33,386	-234	3,810
2029	Commercial	4,792,107	5,131,155	1.05	1.05	-390,716	264	247,090	-13,521,952	247,090	-2,317	17,688
2029	Cross-Cutting	3,405,404	0	0.00	0.00	0	0	0	0	0	0	0
2029	Public	2,431,829	0	0.00	0.00	0	0	0	0	0	0	0
2029	Portfolio Support	2,214,746	0	0.00	0.00	0	0	0	0	0	0	0
2029	TOTAL PORTFOLIO	20,411,562	6,244,314	0.34	0.35	-432,100	331	280,476	-14,266,917	280,476	-2,552	21,498
2030	Residential	9,716,404	2,941,622	0.56	0.59	-31,114	186	78,516	-429,741	78,516	-299	9,205
2030	Commercial	5,471,585	6,683,636	1.15	1.15	107,970	364	279,936	-8,958,696	279,936	-1,475	20,161
2030	Cross-Cutting	3,565,168	0	0.00	0.00	0	0	0	0	0	0	0
2030	Public	2,570,377	0	0.00	0.00	0	0	0	0	0	0	0
2030	Portfolio Support	2,416,920	0	0.00	0.00	0	0	0	0	0	0	0
2030	TOTAL PORTFOLIO	23,740,453	9,625,258	0.56	0.59	76,856	550	358,452	-9,388,436	358,452	-1,774	29,367
2031	Residential	11,191,070	4,000,441	0.63	0.67	-46,500	238	102,349	-711,575	102,349	-451	11,973

2031	Commercial	6,548,507	10,505,537	1.34	1.35	-474,062	518	440,078	-20,560,593	440,078	-3,512	31,519
2031	Cross-Cutting	3,730,081	0	0.00	0.00	0	0	0	0	0	0	0
2031	Public	2,712,343	0	0.00	0.00	0	0	0	0	0	0	0
2031	Portfolio Support	2,609,986	0	0.00	0.00	0	0	0	0	0	0	0
2031	TOTAL PORTFOLIO	26,791,987	14,505,978	0.63	0.67	-520,562	756	542,427	-21,272,168	542,427	-3,963	43,492

20. Additionally, include a brief description of the method used by the PA to estimate the costs presented in the C.9 Table.

NREN estimates in-house costs using a data-informed forecasting methodology. The details of NREN’s estimates are below:

- Labor Costs: Tracked by program and activity. Forecasts are based on prior-year actual expenditures and adjusted to reflect anticipated changes as described in Table E.
- Non-Labor Costs (marketing, materials, professional services, O&M expenses): Forecasts are based on planned program activities and previous expenditure trends.
- Program-Level Time Tracking: Ensures staff time is coded to specific programs.

C. Attachment-A, “BPA Workbook – X Tables”

The Scoping Memo requests: “Present a table akin to PG&E’s Figure 1.9 (Portfolio Overview, p 37) or SDG&E’s Figure 1.10 (p. 23) that not only shows anticipated solicitation schedule of “statewide programs” by calendar year and quarter, but also expected solicitation schedule of local third-party solicitations, by sector, and program area (latter to extent known, and/or by intervention strategy if that is more applicable). For both tables, and for each program entry on the calendar, give an approximate size of budget likely to be available for each solicitation (can be a range).”

1. TURN and CAL PA invite the PAs to propose a common table format for this information. We don't have anything specific in mind. Additionally, include a brief description of the method used by the PA to estimate the costs presented in the C.10 Table.

NREN does not currently administer any statewide programs. Accordingly, there are no anticipated solicitation schedules.

APPENDIX C
LETTERS OF SUPPORT

NREN has received numerous Letters of Support from cities, county officials, assembly members, senators, schools, and housing authorities. These letters are indicative of NREN's strong relationships within its region, built over the years through the work of NREN's partners: Redwood Coast Energy Authority (RCEA), Sierra Business Council (SBC), Lake Area Planning Council (LAPC), and the Mendocino Council of Governments (MCOG).

Letters of Support include:

- Sierra Energy ReImagined
- Shasta County
- Assembly Majority Leader Cecilia Aguiar-Curry
- Climate Acion Mendocino
- Catholic Charities
- City of Arcata
- City of Davis
- City of Eureka
- City of Grass Valley
- City of Woodland
- County of Yolo
- De Colores Resource Center
- County of Mendocino
- Member of Congress Jared Huffman
- Lake County
- Lake Family Resource Center
- Lake Area Planning Council
- Trinity County
- City of Blue Lake
- Grass Valley School District
- Mariposa County
- Senator Mike McGuire
- Nevada City School District
- Nevada County
- Blue Lake Rancheria
- City of Colfax
- City of Point Arena
- County of Placer
- Assemblymember Chris Rogers
- Sonoma Clean Power
- Senator Christopher Cabaldon
- Humboldt County Board of Supervisors
- City of Ferndale
- Burnt Ranch Elementary School District
- Valley Clean Energy
- Willits Senior Center
- Housing Authority of the County of Yolo

- City of Lakeport

Sierra Energy Reimagined
12511 Loma Rica Drive
Grass Valley, CA 95945
www.sierraenergyreimagined.org
info@sierraenergyreimagined.org



President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan Application

Dear President Reynolds:

On behalf of Sierra Energy Reimagined (SERi), a community-based organization serving Nevada County, I am writing to express our strong support for the Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Community-based organizations like SERi see firsthand the barriers rural residents face in accessing clean energy and energy efficiency programs. Regional Energy Networks were created by the California Public Utilities Commission to address longstanding gaps in energy efficiency services provided by California's Investor-Owned Utilities (IOUs). In rural Northern California, many households contribute to utility bill-funded programs but historically receive far fewer benefits. Long travel distances, older and less efficient housing stock, limited local government capacity, and grid reliability challenges all make it harder for rural communities to participate in statewide programs. NREN's locally driven model is essential to closing these gaps.

NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to these needs. NREN began delivering energy efficiency services across 17 rural Northern California counties in 2025, including residential energy kits, home assessments and rebates, as well as public agency support, and is designing for launch in 2026 small business incentives,

Sierra Energy Reimagined
12511 Loma Rica Drive
Grass Valley, CA 95945
www.sierraenergyreimagined.org
info@sierraenergyreimagined.org



workforce education and training, and financing opportunities. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

From a community-based perspective, what makes NREN especially impactful is its emphasis on trusted local partnerships. Programs designed and delivered with community input are more accessible, more culturally responsive, and more likely to reach households that are often left out of traditional utility programs. As a local organization, SERi and its clients in rural Nevada County have already benefited from NREN's collaborative approach and its investment in building regional capacity alongside delivering direct services.

With this 2028-2035 Business Plan application, we trust that NREN will continue offering programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. We are especially encouraged by NREN's commitment to expanding service territory with the goal of ultimately serving all eligible customers across Northern California.

I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

Jan Maes

Executive Director
Sierra Energy Reimagined
12511 Loma Rica Drive
Grass Valley, CA 95945
603-305-9441



SHASTA COUNTY

MATT PLUMMER, DISTRICT 4 SUPERVISOR

BOARD OF SUPERVISORS
1450 Court Street, Suite 308B
Redding, California 96001-1673

(530) 225-5557
www.shastacounty.gov
mplummer@shastacounty.gov

March 10, 2026

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan Application

Dear President Reynolds;

I am writing to express my support for the Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more in utility bill program dollars than they receive in services and experiencing higher than average energy burdens. NREN was established in 2024 to address these gaps and began delivering energy efficiency services across 17 rural Northern California Counties in 2025, including residential energy assessments and rebates, small business incentives, public agency support, workforce education and training, and more.

With this 2028-2035 Business Plan application, NREN will conduct market characterization and needs assessment efforts to determine the best practices to extend those services to the remaining unserved Northern California Counties, including County of Shasta. NREN is committed to working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matt Plummer".

Matt Plummer
Supervisor, District 4
County of Shasta

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0004
(916) 319-2004

E-MAIL
Assemblymember.Aguiar-Curry@assembly.ca.gov

WEBSITE
a04.asmdc.org

Assembly California Legislature



DISTRICT OFFICES
600 A STREET, SUITE D
DAVIS, CA 95616
(530) 757-1034
2721 NAPA VALLEY CORPORATE DRIVE
NAPA, CA 94558
(707) 224-0440

February 13, 2026

President Alice Reynolds
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Support for Northern Rural Energy Network's 2028-2031 Strategic Business Plan Application

As the Assemblymember representing California's Fourth District, I am writing to express my support for the Northern Rural Energy Network's (NREN) application to the California Public Utility Commission (CPUC) to continue and expand energy efficiency efforts in rural Northern California.

NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to rural residents needs. In 2025, NREN began delivering energy efficiency services—including residential energy assessments and rebates, small business incentives, public agency technical assistance, and more—across 17 rural Northern California counties.

Customers in Northern California, including in Yolo County, have historically had limited access to statewide and IOU-sponsored energy efficiency programs, contributing to more utility bill-funded programs than they receive in services while experiencing higher than average energy burdens. Factors such as significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines have compounded, which has made it more difficult to serve these rural areas. NREN's model of locally designed and implemented programs are not only essential, but critical to rural areas such as Yolo County.

With the 2028-2031 Strategic Business Plan, NREN will be growing to serve Yolo County, bringing the total service territory to 18 counties. This expansion will be fundamental in providing energy efficiency programs and services to more than 220,000 residents in Yolo County, relieving energy cost burdens and helping to meet the County's ambitious climate goals. Services in Yolo County will be provided by the County of Yolo's Sustainability Division, which has a strong track record of program implementation success, having distributed nearly 200 energy efficiency kits to low-income unincorporated Yolo County residents in just the second half of 2025.

If approved, this 2028-2031 Strategic Business Plan will allow NREN to expand programs within this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers.

I respectfully urge your support and encourage you to approve this 2028-2031 Strategic Business Plan Application. Thank you in advance for your full consideration.

Sincerely,

A handwritten signature in black ink that reads "Cecilia M. Aguiar-Curry". The signature is fluid and cursive, with the first name "Cecilia" being the most prominent part.

CECILIA AGUIAR-CURRY
Assembly Majority Leader Cecilia Aguiar-Curry
Assemblymember, Fourth District

Climate Action Mendocino
3780 King Ranch Road
Ukiah, CA 95482
February 9, 2026

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan Application

Dear President Reynolds:

On behalf of Climate Action Mendocino, a citizen group, we are writing to express our support for Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts and support for rural Northern California customers.

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to easily access statewide and IOU programs. This means contributing more to utility bills while not receiving the energy efficiency opportunities that are available and also experiencing higher than average energy burdens. Rural areas cover significant geographic distances. Often the housing stock is older and less capable of warming or cooling efficiently. Local jurisdictions are not as capable of providing assistance given financial and staffing constraints. And unreliable transmission lines have made it harder to serve rural areas. That's why NREN's model of locally designed and implemented clean energy programs are so essential.

NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to the needs of rural energy customers. NREN began delivering energy efficiency services across 17 Northern California rural counties in 2025. The services include residential energy kits, home assessments and rebates, as well as public agency support. NREN is designing further programs for small business incentives, workforce education and training, and financing opportunities in 2026. Additionally, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory to support energy efficiency.

With the 2028-2035 Business Plan application, NREN will continue to provide programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. NREN will also expand its service territory; working toward a goal of covering all eligible customers in Northern California. We look forward to supporting NREN in those efforts and urge you to affirm NREN's invaluable benefits to rural customers and to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

Eileen Mitro

Climate Action Mendocino



Providing help
Creating hope

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-31 Business Plan Application

Dear President Reynolds,

On behalf of **Catholic Charities of Yolo-Solano**, I am writing to express my support for the Northern Rural Energy Network's (NREN) application to the California Public Utility Commission (CPUC) to continue and expand its energy efficiency efforts in rural Northern California, including proposed expansion to Yolo County.

Regional Energy Networks were established by the CPUC to close gaps in energy efficiency programs caused by California's Investor-Owned Utilities (IOUs). Historically, customers in rural Northern California have had limited access to statewide and IOU-sponsored energy efficiency programs because of significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines. This expansion would be especially valuable for Yolo County to address the real energy challenges residents face, especially along PG&E's Madison 2101 circuit – one of PG&E's five most outage-burdened circuits, which experienced over 25 outages between 2022-2024.

Since 2025, NREN has begun delivering energy efficiency services across 17 rural Northern California Counties, including residential energy assessments and rebates, small business incentives, and public agency technical assistance, with a strong commitment to serving 44 of California's 109 recognized Tribes that are within NREN's service territory.

Through the 2028–31 Business Plan, NREN would expand to serve Yolo County, bringing its service area to 18 counties and 45 Tribes, extending these offerings to more than 220,000 Yolo County residents. This expansion will help reduce energy burdens and improve bill affordability by connecting households and small businesses to practical energy-saving improvements and available incentives. For the communities **Catholic Charities of Yolo-Solano** serves, expanded access to no-cost guidance, direct-install measures, and rebates can meaningfully lower monthly utility bills and help residents stay safe and stable during periods of extreme heat and rising energy costs.

Services in Yolo County will be provided by the County of Yolo's Sustainability Division, which has a strong track record of program implementation success, having distributed nearly 200 energy efficiency kits to low-income unincorporated Yolo County residents in the second half of 2025 alone.

For these reasons, **Catholic Charities of Yolo-Solano** supports NREN's 2028–31 Business Plan application and encourages the CPUC to approve it, so that energy efficiency programs better serve all Californians, including rural and hard-to-reach customers.

Sincerely,

A handwritten signature in black ink that reads "John Watkins".

John Watkins
Executive Director
Catholic Charities of Yolo-Solano
jwatkins@ccyoso.org



736 F Street
Arcata CA 95521

City Manager
707-822-5953

Environmental Services
707-822-8184

Police
707-822-2428

Recreation
707-822-7091

Community Development
707-822-5955

Finance
707-822-5951

Engineering
707-825-2128

Transportation
707-822-3775

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan Application

Dear President Reynolds:

On behalf of the City of Arcata, I am writing to you to express my support for Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Humboldt County recently adopted a Regional Climate Action Plan, <https://humboldt.gov.org/2464/Humboldt-Regional-Climate-Action-Plan>, and NREN will play an essential role in achieving our goals. The City of Arcata is deeply committed to supporting our rural community's transition to renewable and energy-efficient infrastructure, with affordability and equitable access at the forefront. This commitment is reflected in the City Council's Goals for environmental leadership and sustainable development, as well as the City's Energy Committee and Environmental Services Department goals. The City has invested significant financial and programmatic resources in renewable and energy-efficiency projects and initiatives. However, despite these efforts, the City lacks the capacity to independently provide the full level of support needed to address the unique challenges our rural community faces in accessing energy-efficiency programs; NREN will help provide additional support.

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens. Significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented programs is so essential.

NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to these needs. NREN began delivering energy efficiency services across 17 rural Northern California counties in 2025, including residential energy kits, home assessments and rebates, as well as public agency support, and is

designing for launch in 2026 small business incentives, workforce education and training, and financing opportunities. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. NREN will also expand its service territory; working toward a goal of covering all eligible customers in Northern California. I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

A handwritten signature in blue ink that reads "Kimberly White". The signature is fluid and cursive, with the first name "Kimberly" and the last name "White" clearly distinguishable.

Kimberly White

Mayor

City of Arcata



President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-31 Business Plan Application

Dear President Reynolds,

On behalf of the City of Davis I am writing to express my support for the Northern Rural Energy Network's (NREN) application to the California Public Utility Commission (CPUC) to continue and expand its energy efficiency efforts in rural Northern California, including proposed expansion to Yolo County.

Regional Energy Networks were established by the CPUC to close gaps in energy efficiency programs caused by California's Investor-Owned Utilities (IOUs). Historically, customers in rural Northern California have had limited access to statewide and IOU-sponsored energy efficiency programs because of significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines. This expansion would be especially valuable for Yolo County to address the real energy challenges residents face, especially along PG&E's Madison 2101 circuit – one of PG&E's five most outage-burdened circuits, which experienced over 25 outages between 2022-2024.

Since 2025, NREN has begun delivering energy efficiency services across 17 rural Northern California Counties, including residential energy assessments and rebates, small business incentives, and public agency technical assistance, with a strong commitment to serving 44 of California's 109 recognized Tribes that are within NREN's service territory.

Through the 2028–31 Business Plan, NREN would expand to serve Yolo County, bringing its service area to 18 counties and 45 Tribes, extending these offerings to more than 220,000 Yolo County residents. This expansion will help reduce energy burdens and improve bill affordability by connecting households and small businesses to practical energy-saving improvements and available incentives. For the communities the City of Davis serves, expanded access to no-cost guidance, direct-install measures, and rebates can meaningfully lower monthly utility bills and help residents stay safe and stable during periods of extreme heat and rising energy costs.

Services in Yolo County will be provided by the County of Yolo's Sustainability Division, which has a strong track record of program implementation success, having distributed nearly 200 energy efficiency kits to low-income unincorporated Yolo County residents in the second half of 2025 alone.

530-757-5602 | @CityofDavis   
23 Russell Boulevard, Davis, CA 95616

[CITYOFDAVIS.ORG](https://www.cityofdavis.org)

For these reasons, the City of Davis supports NREN's 2028–31 Business Plan application and encourages the CPUC to approve it, so that energy efficiency programs better serve all Californians, including rural and hard-to-reach customers.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Stan Gryczko', is positioned above the printed name.

Stan Gryczko, Assistant City Manager

February 2, 2026

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan Application

Dear President Reynolds:

On behalf of the City of Eureka, I am writing to you to express my support for Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Humboldt County recently adopted a [Regional Climate Action Plan](#), and NREN will play an essential role in achieving our goals. As a small rural City, Eureka seeks to support the regional approach to efficient management of energy use.

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens. Significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented programs is so essential.

NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to these needs. NREN began delivering energy efficiency services across 17 rural Northern California counties in 2025, including residential energy kits, home assessments and rebates, as well as public agency support, and is designing for launch in 2026 small business incentives, workforce education and training, and financing opportunities. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. NREN will also expand its service territory; working toward a goal of covering all eligible customers in Northern California. I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

Kim Bergel, Mayor





CITY OF GRASS VALLEY
Public Works Department

Public Works
530-274-4350

125 East Main Street
Grass Valley, CA 95945

January 20, 2026

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan Application

Dear President Reynolds:

On behalf of the City of Grass Valley, I am writing to you to express my support for Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens. Significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented programs is so essential.

NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to these needs. NREN began delivering energy efficiency services across 17 rural Northern California counties in 2025, including residential energy kits, home assessments and rebates, as well as public agency support, and is designing for launch in 2026 small business incentives, workforce education and training, and financing opportunities. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. NREN will also expand its service territory; working toward a goal of covering all eligible customers in Northern California. I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

Zac Quentmeyer
Deputy Public Works Director
City of Grass Valley
530-274-4713 | zacq@cityofgrassvalley.com



CITY MANAGER'S OFFICE | 300 FIRST STREET, WOODLAND, CA 95695 | 530-661-5800

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-31 Business Plan Application

Dear President Reynolds,

On behalf of the City of Woodland, I am writing to express my support for the Northern Rural Energy Network's (NREN) application to the California Public Utility Commission (CPUC) to continue and expand its energy efficiency efforts in rural Northern California, including proposed expansion to Yolo County.

Regional Energy Networks were established by the CPUC to close gaps in energy efficiency programs caused by California's Investor-Owned Utilities (IOUs). Historically, customers in rural Northern California have had limited access to statewide and IOU-sponsored energy efficiency programs because of significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines. This expansion would be especially valuable for Yolo County to address the real energy challenges residents face, especially along PG&E's Madison 2101 circuit – one of PG&E's five most outage-burdened circuits, which experienced over 25 outages between 2022-2024.

Since 2025, NREN has begun delivering energy efficiency services across 17 rural Northern California Counties, including residential energy assessments and rebates, small business incentives, and public agency technical assistance, with a strong commitment to serving 44 of California's 109 recognized Tribes that are within NREN's service territory.

Through the 2028–31 Business Plan, NREN would expand to serve Yolo County, bringing its service area to 18 counties and 45 Tribes, extending these offerings to more than 220,000 Yolo County residents. This expansion will help reduce energy burdens and improve bill affordability by connecting households and small businesses to practical energy-saving improvements and available incentives. For Woodland residents, expanded access to no-cost guidance, direct-install measures, and rebates can meaningfully lower monthly utility bills and help residents stay safe and stable during periods of extreme heat and rising energy costs.

Services in Yolo County will be provided by the County of Yolo's Sustainability Division, which has a strong track record of program implementation success, having distributed nearly 200 energy efficiency kits to low-income unincorporated Yolo County residents in the second half of 2025 alone.

For these reasons, the City of Woodland supports NREN's 2028–31 Business Plan application and encourages the CPUC to approve it, so that energy efficiency programs better serve all Californians, including rural and hard-to-reach customers.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ken Hiatt", with a long horizontal line extending to the right.

Ken Hiatt
City Manager



COUNTY OF YOLO

Board of Supervisors

District 1, **Oscar Villegas**
District 2, **Lucas Frerichs**
District 3, **Dr. Mary Vixie Sandy**
District 4, **Dr. Sheila A. Allen**
District 5, **Angel Barajas**

625 Court Street, Room 204 • Woodland, CA 95695
(530) 666-8195 • FAX (530) 666-8193
www.yolocounty.gov

County Administrator, **Michael Webb**
Sr. Deputy Clerk of the Board, **Julie Dachtler**

January 29, 2026

President Reynolds
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Support for Northern Rural Energy Network's 2028-31 Strategic Business Plan Application

Dear President Reynolds:

On behalf of the County of Yolo, I am writing to express our support for the Northern Rural Energy Network's (NREN) application to the California Public Utility Commission (CPUC) to continue and expand its energy efficiency efforts in rural Northern California.

Regional Energy Networks were established by the CPUC to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California, including in Yolo County, have historically had limited access to statewide and IOU-sponsored energy efficiency programs, contributing more to utility bill-funded programs than they receive in services while experiencing higher than average energy burdens. NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to these needs. In 2025, NREN began delivering energy efficiency services—including residential energy assessments and rebates, small business incentives, public agency technical assistance, and more—across 17 rural Northern California Counties.

With the 2028-2031 Business Plan application, NREN will be growing to serve Yolo County, bringing its service territory to 18 counties. This expansion will be critical in providing energy efficiency programs and services to the more than 220,000 residents in Yolo County, relieving energy cost burdens and helping to meet the County's ambitious climate goals. Services in Yolo County will be provided by the County of Yolo's Sustainability Division, which has a strong track record of program implementation success, having distributed nearly 200 energy efficiency kits to low-income unincorporated Yolo County residents in the second half of 2025 alone.

With this 2028-2031 Business Plan application, NREN will expand programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. We look forward to supporting NREN in those efforts here in Yolo County and encourage you to approve the 2028-2031 Strategic Business Plan Application.

For further details, please contact Cindy Perez at cindy.perez@yolocounty.gov or 530-406-5775.

Sincerely,

A handwritten signature in cursive script that reads "Sheila A. Allen". The signature is written in dark ink and is positioned above the printed name and title.

Dr. Sheila A. Allen
Chair, Yolo County Board of Supervisors

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-31 Business Plan Application

Dear President Reynolds,

On behalf of De Colores Resource Center (De Colores), I am writing to express my support for the Northern Rural Energy Network's (NREN) application to the California Public Utility Commission (CPUC) to continue and expand its energy efficiency efforts in rural Northern California, including proposed expansion to Yolo County.

Regional Energy Networks were established by the CPUC to close gaps in energy efficiency programs caused by California's Investor-Owned Utilities (IOUs). Historically, customers in rural Northern California have had limited access to statewide and IOU-sponsored energy efficiency programs because of significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines. This expansion would be especially valuable for Yolo County to address the real energy challenges residents face, especially along PG&E's Madison 2101 circuit – one of PG&E's five most outage-burdened circuits, which experienced over 25 outages between 2022-2024.

Since 2025, NREN has begun delivering energy efficiency services across 17 rural Northern California Counties, including residential energy assessments and rebates, small business incentives, and public agency technical assistance, with a strong commitment to serving 44 of California's 109 recognized Tribes that are within NREN's service territory.

Through the 2028–31 Business Plan, NREN would expand to serve Yolo County, bringing its service area to 18 counties and 45 Tribes, extending these offerings to more than 220,000 Yolo County residents. This expansion will help reduce energy burdens and improve bill affordability by connecting households and small businesses to practical energy-saving improvements and available incentives. For the communities De Colores serves, expanded access to no-cost guidance, direct-install measures, and rebates can meaningfully lower monthly utility bills and help residents stay safe and stable during periods of extreme heat and rising energy costs. Our focus is on engaging agricultural communities through community-led initiatives and meaningful translations of educational materials that inform and drive action.

Services in Yolo County will be provided by the County of Yolo's Sustainability Division, which has a strong track record of program implementation success, having distributed nearly 200 energy efficiency kits to low-income unincorporated Yolo County residents in the second half of 2025 alone.

For these reasons, De Colores supports NREN's 2028–31 Business Plan application and encourages the CPUC to approve it, so that energy efficiency programs better serve all Californians, including rural and under-reached customers.

Sincerely,

Esmeralda Mandujano, MPH
Co-Director, De Colores Resource Center
esmeraldamandujano@decolores.org | www.decolores.org





COUNTY OF MENDOCINO

Board of Supervisors

JOHN HASCHAK
THIRD DISTRICT SUPERVISOR

501 Low Gap Rd. Room 1010
Ukiah, CA 95482

Email: haschakj@mendocinocounty.org
Website: www.mendocinocounty.org

Office: (707) 463-4221
Fax: (707) 463-5649

February 8, 2026

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan Application

Dear President Reynolds:

As the 3rd District Supervisor of Mendocino County and Chair of the Mendocino Council of Governments, I am writing to you to express my support for Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens. Significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented programs is so essential.

NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to these needs. NREN began delivering energy efficiency services across 17 rural Northern California counties in 2025, including residential energy kits, home assessments and rebates, as well as public agency support, and is designing for launch in 2026 small business incentives, workforce education and training, and financing opportunities. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. NREN will also expand its service territory; working toward a goal of covering all eligible customers in Northern

California. I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

John Haschak
3rd District Supervisor
Mendocino County

Congress of the United States
House of Representatives
Washington, DC 20515-0502

February 24, 2026

John Reynolds, President
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Dear President Reynolds:

I am writing in support of the Northern Rural Energy Network's (NREN) application to fund its 2028-2035 Strategic Business Plan. This plan will allow NREN to expand its energy efficiency efforts to some of the most difficult to reach communities in Northern California.

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs through Investor-Owned Utilities. Customers in rural Northern California have often been unable to access these programs and contribute more to utility bill-funded efficiency programs than they receive in services – and at higher cost. Isolation, older housing stock, lower local capacity, and unreliable transmission has made it difficult to serve these areas.

NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council to respond to these needs in 17 rural counties in 2025, providing residential energy assessments and rebates, small business incentives, public agency support, and workforce education. NREN is also committed to serving 44 recognized California tribes. Through its 2028-2035 business plan application, NREN will expand its service area to ensure these programs reach even the most rural customers.

Please give the Northern Rural Energy Network's application to fund its 2028-2035 business plan your full and fair consideration. If you have questions, please contact my Senior District Representative John Driscoll at (707) 407-3585.

Sincerely,



JARED HUFFMAN
Member of Congress



COUNTY OF LAKE
BOARD OF SUPERVISORS
Courthouse - 255 North Forbes Street
Lakeport, California 95453
TELEPHONE (707) 263-2368
FAX (707) 263-2207

Helen Owen – District 1
Bruno Sabatier – District 2
Eddie Crandell – District 3
Brad Rasmussen – District 4
Jessica Pyska – District 5

February 10, 2026

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's (NREN's) 2028-35 Strategic Business Plan Application

Dear President Reynolds,

We are writing to express our strong support for the Northern Rural Energy Network's (NREN) Business Plan application to continue and expand its energy efficiency efforts and programs in rural Northern California.

Regional Energy Networks (RENs) were established by the California Public Utility Commission (CPUC) to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California, including Lake County, have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens.

NREN was established in 2024 by the Lake Area Planning Council, Mendocino Council of Governments, Redwood Coast Energy Authority, and Sierra Business Council as a direct response to a number of critical needs and began delivering energy efficiency services across 17 rural Northern California Counties in 2025. For Lake County these services include residential energy efficiency kits, home energy assessments and residential rebates for efficient appliances and other equipment. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, expanding its program profile to cover commercial, public, and other needs in

Lake County. We look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

A handwritten signature in blue ink, appearing to read 'BR RASMUSSEN', with a stylized, cursive script.

Brad Rasmussen
Chair, Lake County Board of Supervisors



Lake Family Resource Center
Strengthening Families

February 2, 2026

President Reynolds
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's (NREN's) 2028–2035 Strategic Business Plan Application

Dear President Reynolds,

I am pleased to offer my strong support for the Northern Rural Energy Network's (NREN's) 2028–2035 Strategic Business Plan Application and its continued efforts to advance equitable access to energy efficiency programs in rural Northern California.

Regional Energy Networks were established by the California Public Utilities Commission to address gaps in energy efficiency services not adequately reached by California's Investor-Owned Utilities. These gaps are especially evident in rural communities such as Lake County, where residents experience higher-than-average energy burdens, aging housing stock, and limited access to statewide programs.

Lake Family Resource Center serves some of Lake County's most vulnerable residents, including low-income families with young children, older adults on fixed incomes, survivors of violence, individuals with disabilities, and households facing housing and food insecurity. For these populations, rising utility costs can directly threaten household stability and well-being.

Through our collaboration with NREN at the Lakeport Senior Center, we have seen the value of locally delivered, community-based energy efficiency services. NREN's Lake County staff have provided free Energy Efficiency Kits, information about rebates for energy-efficient equipment, and access to Home Energy Assessments—resources that are especially important for seniors and low-income households.

This Business Plan Application also presents an opportunity to expand collaboration across the full range of Lake Family Resource Center's programs and services. Strengthening partnerships with trusted community-based organizations will allow NREN to more effectively reach vulnerable households and reduce barriers to participation.

I strongly support NREN's 2028–2035 Strategic Business Plan Application and urge the Commission to approve it.

Sincerely,

Lisa Morrow
Executive Director
Lisam@lakefrc.org



LAKE COUNTY/CITY AREA PLANNING COUNCIL

Lisa Davey-Bates, Executive Director
www.lakeapc.org

525 South Main Street, Ukiah, CA 95482
Administration: Suite G ~ 707-234-3314
Planning: Suite B ~ 707-263-7799

1/14/2026

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's (NREN's) 2028-35 Strategic Business Plan Application

Dear President Reynolds,

I am writing to express my strong support for the Northern Rural Energy Network's (NREN) Business Plan application to continue and expand its energy efficiency efforts and programs in rural Northern California.

Regional Energy Networks (RENs) were established by the California Public Utility Commission (CPUC) to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California, including Lake County, have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens.

NREN was established in 2024 by the Lake Area Planning Council, Mendocino Council of Governments, Redwood Coast Energy Authority, and Sierra Business Council as a direct response to a number of critical needs and began delivering energy efficiency services across 17 rural Northern California Counties in 2025. For Lake County these services include residential energy efficiency kits, home energy assessments and residential rebates for efficient appliances and other equipment. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, expanding its program profile to cover commercial, public, and other needs in Lake County. I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

A handwritten signature in black ink, reading "Lisa Davey-Bates".



Trinity County Office of Education

Fabio Robles, Ed.D.
Trinity County
Superintendent of Schools

P.O. Box 1256 • 201 Memorial Drive, Weaverville, CA 96093-1256
(530) 623-2861 • FAX (530) 623-4489
<https://www.tcoek12.org>

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan
Application

Dear President Reynolds;

On behalf of the Trinity County Office of Education, I am writing to express our support for the Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more in utility bill program dollars than they receive in services and experiencing higher than average energy burdens. NREN was established in 2024 to address these gaps and began delivering energy efficiency services across 17 rural Northern California Counties in 2025, including residential energy assessments and rebates, small business incentives, public agency support, workforce education and training, and more.

With this 2028-2035 Business Plan application, NREN will conduct market characterization and needs assessment efforts to determine the best practices to extend those services to the remaining unserved Northern California customers, including 9 school districts in Trinity County. NREN is committed to working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. We look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

A handwritten signature in blue ink, appearing to be "Fabio Robles", written over a horizontal line.

Fabio Robles, Ed. D
Trinity County Superintendent of Schools



CITY OF BLUE LAKE

Post Office Box 458 • 111 Greenwood Road • Blue Lake, CA 95525
Phone 707.668.5655 Fax 707.668.5916

February 10, 2026

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-2035 Strategic Business Plan Application

Dear President Reynolds;

I am writing to express my support for the Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens. Significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented programs is so essential. NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to these needs and began delivering energy efficiency services across 17 rural Northern California Counties in 2025, including residential energy assessments and rebates, small business incentives, public agency support, workforce education and training, and more. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. NREN will also expand its service territory; working toward a goal of covering all eligible customers in Northern California. I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

John Sawatsky
Mayor



GRASS VALLEY

SCHOOL DISTRICT

Inspiring success in every child!

District Office
10840 Gilmore Way
Grass Valley, CA 95945
(530) 273-4483 tel (530) 273-0248 fax
Andrew Withers - Superintendent

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan Application

Dear President Reynolds:

On behalf of the Grass Valley School District, I am writing to you to express my support for Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens. Significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented programs is so essential.

NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to these needs. NREN began delivering energy efficiency services across 17 rural Northern California counties in 2025, including residential energy kits, home assessments and rebates, as well as public agency support, and is designing for launch in 2026 small business incentives, workforce education and training, and financing opportunities. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. NREN will also expand its service territory; working toward a goal of covering all eligible customers in Northern California. I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

A handwritten signature in blue ink, appearing to read 'B. Martinez', with a long horizontal flourish extending to the right.

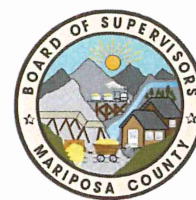
Brian Martinez

Assistant Superintendent/CBO



MARIPOSA COUNTY

Board of Supervisors



RESOLUTION - ACTION REQUESTED 2026-80

MEETING: February 17, 2026
TO: The Board of Supervisors
FROM: Steve Engfer, Planning Director
RE: Approve a Letter of Support for the Sierra Business Council's Northern Rural Energy Network; and Authorize the Board of Supervisors Chair to Sign the Letter

RECOMMENDATION AND JUSTIFICATION

Approve a Letter of Support for the Sierra Business Council's Northern Rural Energy Network; and Authorize the Board of Supervisors Chair to Sign the Letter.

Following the successful completion of a GHG Inventory Report conducted by the Sierra Business Council in partnership with the Planning Department, the Sierra Business Council (SBC) requested Mariposa County's signature on a letter of support for their Northern Rural Energy Network (NREN). The NREN is a program created to bring energy efficiency services to rural Northern California communities that have not been well served by traditional utility programs. Many rural residents, including those in Mariposa County, face higher energy costs because of long distances, older homes, limited local resources, and less reliable power infrastructure. NREN helps address these challenges by offering services like home energy assessments, rebates, energy-saving kits, and support for public agencies, with plans to add small business incentives, workforce training, and financing options. The program also works closely with Tribal communities and local partners to make sure services fit local needs. Continuing and expanding NREN's work would help Mariposa County residents and agencies lower energy costs, improve energy reliability, and keep more utility dollars benefiting the local community. Therefore, staff recommends that the Board of Supervisors chair sign this letter of support for the NREN,

BACKGROUND AND HISTORY OF BOARD ACTIONS

The Board has approved similar letters of support in the past.

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION

Mariposa County will not be included in the SBC's business plan as a county supportive of NREN.

FINANCIAL IMPACT

None

ATTACHMENTS

1. Letter of Support

VOTE RESULT

RESULT: **Adopted (UNANIMOUS)**

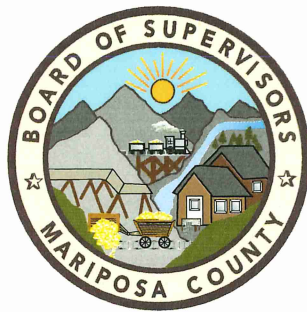
MOVER: District I Supervisor Rosemarie Smallcombe

SECONDER: District IV Supervisor Jenni Kiser

AYES: District I Supervisor Smallcombe, District III Supervisor Toso, District II Supervisor Poe, District IV Supervisor Kiser

EXCUSED: District V Supervisor Miles Menetrey

Mariposa County Board of Supervisors



District 1 ... ROSEMARIE SMALLCOMBE
District 2 SHANNON POE
District 3 DANETTE TOSO
District 4 JENNI KISER
District 5 MILES MENETREY

JOE LYNCH
County Administrative Officer

DANIELLE BONDSHU
Clerk of the Board

P. O. Box 784
Mariposa, CA 95338
(209) 966-3222
(800) 736-1252
www.mariposacounty.gov/board

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

February 17, 2026

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan Application

Dear President Reynolds:

On behalf of the County of Mariposa, I am writing to you to express my support for Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens. Significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented programs is so essential.

NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to these needs. NREN began delivering energy efficiency services across 17 rural Northern California counties in 2025, including residential energy kits, home assessments and rebates, as well as public agency support, and is designing for launch in 2026 small business incentives, workforce education and training, and financing opportunities. Furthermore, NREN is deeply

committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. NREN will also expand its service territory; working toward a goal of covering all eligible customers in Northern California. I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

A handwritten signature in blue ink that reads "Danette Toso". The signature is fluid and cursive, with the first name "Danette" and the last name "Toso" clearly distinguishable. It is positioned above a horizontal line.

Danette Toso, Chair
Board of Supervisors

California State Senate

SENATOR MIKE MCGUIRE

PRESIDENT PRO TEMPORE EMERITUS

NORTHERN CALIFORNIA'S SECOND SENATE DISTRICT



February 10, 2026

Alice Reynolds
President of the California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear President Reynolds:

I am writing to express my strong support for the Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher energy burdens. Geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines have made it harder to serve these areas, which is why NREN's model of locally designed and implemented programs is essential. NREN was established in 2024 as a response to these needs and began delivering energy efficiency services across 17 rural counties in 2025, including residential energy assessments and rebates, small business incentives, public agency support, workforce education and training. NREN remains committed to serving the 44 of California's 109 recognized Tribes in the area.

With this 2028-2035 Business Plan application, NREN will continue working with stakeholders to ensure California's energy efficiency programs serves all. I respectfully encourage your full and fair consideration of this proposal. If you have any questions, please don't hesitate to contact us at 707-445-6508.

Warmest Regards,

A handwritten signature in black ink, appearing to be "Mike McGuire".

MIKE MCGUIRE

Senator



800 Hoover Lane

Nevada City, CA 95959

Phone: 530.265.1820

Fax: 530.265.1822

ncsd.school

January 16, 2026

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan Application

Dear President Reynolds:

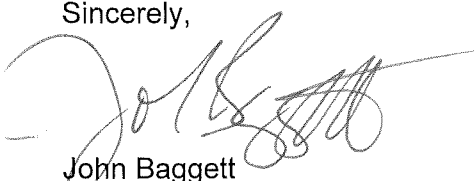
On behalf of Nevada City School District, I am writing to you to express my support for Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens. Significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented programs is so essential.

NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to these needs. NREN began delivering energy efficiency services across 17 rural Northern California counties in 2025, including residential energy kits, home assessments and rebates, as well as public agency support, and is designing for launch in 2026 small business incentives, workforce education and training, and financing opportunities. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. NREN will also expand its service territory; working toward a goal of covering all eligible customers in Northern California. I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,



John Baggett
Superintendent

COUNTY OF NEVADA
STATE OF CALIFORNIA
BOARD OF SUPERVISORS



Heidi Hall, 1st District
Robb Tucker, 2nd District
Chair Lisa Swarthout, 3rd District
Vice Chair Susan Hoek, 4th District
Hardy Bullock, 5th District

Tine Mathiasen, Chief Deputy Clerk of the Board

February 13, 2026

President Reynolds
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Support – Northern Rural Energy Network Programs

Dear President Reynolds:

On behalf of the Nevada County Board of Supervisors, I am writing to express our support for the Northern Rural Energy Network's (NREN) application to continue to expand energy efficiency efforts in rural Northern California.

Nevada County is a rural county comprised of roughly 102,000 residents, 30.5% of which are over the age of 65 and live off fixed incomes. Like others across the state, our residents have faced sizable increases in utility rates over recent years, creating affordability challenges. Any opportunities for our residents to access energy efficiency tools and programs which lower utility costs are vital for ensuring affordability.

The NREN is an important program that fills gaps in energy efficiency programs provided by California's investor-owned utilities. Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens. Significant geographic distances, older housing stock, lower local jurisdictional capacity and unreliable transmission lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented program is so essential.

Nevada County is supportive of the NREN program and hopes that it will continue offering programs to help jurisdictions such as ours with energy efficiency and access to infrastructure. We encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lisa Swarthout", is written over a horizontal line.

Lisa Swarthout, Chair
Nevada County Board of Supervisors

BLUE LAKE RANCHERIA

P.O. Box 428
Blue Lake, CA 95525

Office: (707) 668-5101
Fax: (707) 668-4272

www.bluelakerancheria-nsn.gov



President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan Application

Dear President Reynolds:

On behalf of the Blue Lake Rancheria, I am writing to you to express my support for Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Since 2002 the Blue Lake Rancheria Tribe has accelerated transition to a zero-carbon community, for its economic, environmental, health, and overall resilience benefits. The Tribe takes a "lifeline sector" approach to achieving zero-carbon sustainability and resilience. Lifeline sectors include: energy, water, food, communication/IT, and transportation. Through local, regional, state, national, and public/private partnerships – and sound planning and policy that pairs climate mitigation and adaptation in decision-making – the Tribe is exceeding its goals.

A skilled workforce is essential for driving economic growth and competitiveness. Through the Blue Lake Rancheria's Ta'm's workforce training center and makerspace, individuals will gain access to hands-on training, industry certifications, and career pathways aligned with sectors such as energy efficiency, renewable energy (including offshore wind), advanced manufacturing, healthcare, and sustainable agriculture. In partnership with Cal Poly Humboldt, College of the Redwoods, NGOs, labor, and other regional stakeholders, the Ta'm workforce programming will pay particular attention to those populations that have had difficulty accessing training opportunities and finding quality jobs

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens. Significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission

BLUE LAKE RANCHERIA

P.O. Box 428
Blue Lake, CA 95525

Office: (707) 668-5101
Fax: (707) 668-4272

www.bluelakerancheria-nsn.gov



lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented programs is so essential.

NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to these needs. NREN began delivering energy efficiency services across 17 rural Northern California counties in 2025, including residential energy kits, home assessments and rebates, as well as public agency support, and is designing for launch in 2026 small business incentives, workforce education and training, and financing opportunities. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. NREN will also expand its service territory; working toward a goal of covering all eligible customers in Northern California. The Blue Lake Rancheria particularly looks forward to partnering with NREN in its workforce education and training programs. I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

A handwritten signature in blue ink, appearing to read "Heidi Moore-Guynup", is written over a horizontal line.

Heidi Moore-Guynup
Director, Tribal and Government Affairs
Blue Lake Rancheria



January 15, 2026

President Reynolds
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear President Reynolds:

On behalf of the City of Colfax, I am writing to express the City's support for the Northern Rural Energy Network's (NREN) application to continue to expand energy efficiency efforts in rural Northern California.

Colfax is a small rural city located in Placer County with a population of about 1,967 in Placer County.

The NREN is an important program that fills gaps in energy efficiency programs provided by California's investor-owned utilities. Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens. Significant geographic distances, older housing stock, lower local jurisdictional capacity and unreliable transmission lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented program is so essential.

The City is supportive of the NREN program and hopes that it will continue offering programs to help jurisdictions such as ours with energy efficiency and access to infrastructure. We encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ron Walker", is written over the "Sincerely," and extends across the line.

Ron Walker
City Manager
P.O. Box 702
33 South Main Street
Colfax, CA 95713
(530) 346-2313

CITY OF POINT ARENA

451 School Street
P.O. Box 67
Point Arena CA 95468
(707) 882-2122
pointarena.ca.gov



Mayor Barbara Burkey
Vice-Mayor Dan Doyle
Councilmember Anna Dobbins
Councilmember Jim Koogle
Councilmember Jeff Hansen

City Manager Molly Haviland

February 23, 2026

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan Application

Dear President Reynolds:

On behalf of the City of Point Arena, I am writing to you to express my support for Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens. Significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented programs is so essential.

NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to these needs. NREN began delivering energy efficiency services across 17 rural Northern California counties in 2025, including residential energy kits, home assessments and rebates, as well as public agency support, and is designing for launch

in 2026 small business incentives, workforce education and training, and financing opportunities. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. NREN will also expand its service territory; working toward a goal of covering all eligible customers in Northern California. I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,



Barbara Burkey

Mayor, City of Point Arena



February 25, 2026

California Public Utilities Commission
Energy Division
505 Van Ness Avenue
San Francisco, CA 94102

RE: Letter of Support – 2028–2031 Northern Rural Energy Network (NREN) Business Plan

Dear Commissioners,

On behalf of the County of Placer, I am pleased to express our support for the 2028–2031 Business Plan submitted by the Northern Rural Energy Network (NREN), administered in part by Sierra Business Council and its regional partners.

Placer County includes both urbanized and deeply rural communities, many of which face unique challenges related to energy affordability, building decarbonization, wildfire risk, and climate resilience. Programs tailored specifically to rural contexts are essential to ensuring that our residents, businesses, and public agencies have equitable access to energy efficiency and electrification resources.

The County has adopted the Placer County Sustainability Plan (PCSP), which establishes greenhouse gas reduction targets and climate adaptation strategies. Many of the strategies identified in the PCSP depend on expanded access to energy efficiency retrofits, electrification upgrades, workforce development, and financing tools. The NREN framework provides a regional platform capable of delivering these services in ways that reflect the geographic, economic, and hazard conditions of the Sierra foothills.

We are particularly supportive of NREN's focus on:

- Energy efficiency and electrification programs for rural households
- Support for small businesses and public facilities
- Workforce development in building decarbonization trades
- Codes and standards education
- Targeted outreach to vulnerable and underserved communities



As Placer County continues work on wildfire resilience, extreme heat adaptation, and long-term greenhouse gas reduction, regional coordination through entities such as NREN is increasingly important.

We appreciate the CPUC's continued support of Regional Energy Networks serving rural communities and encourage approval of the 2028–2031 NREN Business Plan.

Sincerely,

Angel Green | Senior Planner
Community Development Resource Agency
County of Placer

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0002
(916) 319-2002
FAX (916) 319-2102

DISTRICT OFFICE
50 D STREET, SUITE 450
SANTA ROSA, CA 95404
(707) 576-2526
FAX: (707) 576-2297

E-MAIL

Assemblymember.Rogers@assembly.ca.gov



COMMITTEES
BUDGET
COMMUNICATIONS AND
CONVEYANCE
TRANSPORTATION
UTILITIES AND ENERGY
WATER, PARKS, AND WILDLIFE
BUDGET SUBCOMMITTEE NO. 4 ON
CLIMATE CRISIS, RESOURCES,
ENERGY, AND TRANSPORTATION

March 2, 2026

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-2035 Strategic Business Plan Application

Dear President Reynolds,

I am writing to express my support for the Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Regional Energy Networks were established by the Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens.

Significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented programs is so essential. NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to these needs and began delivering energy efficiency services across 17 rural Northern California Counties in 2025, including residential energy assessments and rebates, small business incentives, public agency support, workforce education and training, and more. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. NREN will also expand its service territory; working toward a goal of covering all eligible customers in Northern California. I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Please feel free to contact my office at 707-576-2526 if you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink that reads "Chris Rogers". The signature is written in a cursive style with a large, stylized "C" and "R".

CHRIS ROGERS
Assemblymember, District 2
CR:hm



P.O. Box 1030, Santa Rosa, CA 95402

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan Application

Dear President Reynolds:

On behalf of Sonoma Clean Power, I am writing to express my support for Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

NREN and Sonoma Clean Power (SCP) have established a valuable partnership to support our shared customers in Mendocino County. SCP is the public power provider for Sonoma and Mendocino counties. We provide our customers with cleaner electricity from sources like solar, wind, geothermal and hydropower, as well as promoting local solutions to climate change. SCP is a not-for-profit agency, independently run by the Counties of Sonoma and Mendocino.

Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens. Significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented programs is so essential.

NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to these needs. NREN began delivering energy efficiency services across 17 rural Northern California counties in 2025, including residential energy kits, home assessments and rebates, as well as public agency support, and is designing for launch in 2026 small business incentives, workforce education and training, and financing opportunities. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. NREN will also expand its service territory; working toward a goal of covering all eligible customers in Northern California. I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

A handwritten signature in black ink, appearing to read "Felicia Smith", is placed above the printed name.

Felicia Smith
Director of Customer Energy Solutions

1021 O STREET
SACRAMENTO, CA 95814
(916) 651-4003

California State Senate

SENATOR
CHRISTOPHER CABALDON
THIRD SENATE DISTRICT



President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-31 Strategic Business Plan Application

Dear President Reynolds,

I am writing to express my support for the Northern Rural Energy Network's (NREN) 2028-31 Strategic Business Plan application to the California Public Utility Commission (CPUC).

Regional Energy Networks were established by the CPUC to fill gaps in energy efficiency programs caused by California's Investor-Owned Utilities (IOUs). Historically, customers in rural Northern California have had limited access to statewide and IOU-sponsored energy efficiency programs because of significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines.

In 2025, NREN helped close this gap. It has delivered energy efficiency services—including residential energy assessments and rebates, small business incentives, public agency technical assistance, and more—across 17 rural Northern California Counties. It is even committed to serving 45 of California's 109 recognized Tribes that are within NREN's service territory.

NREN's 2028-2031 Business Plan application includes the expansion of their service territory. They would be at work in 18 counties. Additionally, NREN will expand programs begun in this current cycle, working with community stakeholders to ensure California's essential energy efficiency programs serve all Californians. I look forward to supporting NREN in those efforts and encourage this Commission to approve the 2028-2031 Strategic Business Plan Application. If you have any additional questions, please contact me at (530)750-7913.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Cabaldon".

CHRISTOPHER CABALDON
Senator, 3rd District



COUNTY OF HUMBOLDT

COUNTY ADMINISTRATIVE OFFICE

825 5th Street, Suite 112, Eureka, CA 95501-1153

Telephone (707) 445-7266 Fax (707) 445-7299

cao@co.humboldt.ca.us

Feb. 13, 2026

President Alice Reynolds
California Public Utilities Commission
505 Van Ness
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan Application

Dear President Reynolds:

On behalf of the Humboldt County Board of Supervisors, I am writing to you to express the County of Humboldt's support for Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Humboldt County recently adopted a Regional Climate Action Plan, <https://humboldt.gov.org/2464/Humboldt-Regional-Climate-Action-Plan>, and NREN will play an essential role in achieving our goals. Humboldt County is the northernmost coastal county in PG&E service territory. Home to Humboldt State Polytechnic University and the Schatz Energy Research Center, six federally recognized Tribal Governments, active forestry, fishing, and agriculture, the world's tallest trees, the second-largest enclosed natural bay in the state, and future center of the West Coast offshore wind industry, Humboldt County is a study in contrasts. While a long-time leader in environmental awareness and energy innovation, the deeply rural region has also suffered economic challenges from the boom-and-bust cycle of resource extraction industries. A number of factors combine to make it difficult to achieve electrification goals through traditional statewide and IOU energy efficiency goals. Many rural communities lie at the end of unreliable transmission lines and depend on delivered fuels such as propane, kerosene, and cordwood, for heating. Other than some of the sparsely populated inland areas, there is little cooling load and the region experiences winter peaks as opposed to the summer peaks in the rest of the state. Homes and commercial buildings are older than state averages and often need costly electrical upgrades, while incomes are lower and overall energy burdens higher. Jurisdictional governments are understaffed and underfunded, and anti-climate-action political stances still hold sway in many places.

The Redwood Coast Energy Authority (RCEA) was founded in 2003 to address the need for local solutions to regional energy challenges. As a Joint Powers Agency whose members include the County of Humboldt, the Cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell, Trinidad, the Blue Lake Rancheria Tribe, and Yurok Tribe, RCEA's purpose is to develop and implement sustainable energy initiatives that reduce energy demand, increase energy efficiency, and advance the use of clean, efficient, and renewable resources available in the region. Over the course of the past two decades, RCEA has leveraged partnerships with PG&E, local non-profits and community base organizations, and launched a community choice aggregation program to achieve this purpose. Prior to launching NREN, RCEA implemented an Elect-to-Administer resource acquisition program,

while continuing its Local Government Partnership program with PG&E, various grant-funded programs, and other programs self-funded through its CCA. In addition to implementing NREN programs in Humboldt County, RCEA is the Lead Portfolio Administrator for NREN.

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens. Significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented programs is so essential.

NREN was established in 2024 by the RCEA, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to these needs. NREN began delivering energy efficiency services across 17 rural Northern California counties in 2025, including residential energy kits, home assessments and rebates, as well as public agency support, and is designing for launch in 2026 small business incentives, workforce education and training, and financing opportunities. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. NREN will also expand its service territory; working toward a goal of covering all eligible customers in Northern California. The County of Humboldt supports efforts to provide the technical, physical and personnel infrastructure needed to reduce carbon emissions. For these reasons we look forward to supporting NREN in its efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,



Elishia Hayes
Humboldt County Administrative Officer

February 1, 2026

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan Application

Dear President Reynolds:

As a Councilman for the City of Ferndale and appointed Director to the Redwood Coast Energy Authority, I am writing to you to express my support for Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Humboldt County recently adopted a Regional Climate Action Plan, <https://humboldt.gov.org/2464/Humboldt-Regional-Climate-Action-Plan>, and NREN will play an essential role in achieving our goals. Ferndale is known as a vibrant Victorian Village committed to the Regional Climate Action Plan and in support of the production of clean energy. Currently we are exploring the possibility of a microgrid for powering essential services in our city.

Our City is often impacted by the loss of energy as a result of disasters ranging from earthquake to flood. Other nearby cities in our north area are affected by fire, significant geographic distances, lower local jurisdictional capacity, and unreliable transmission lines. The NREN program opens possibilities for many more people.

NREN was established in 2024 for the Redwood Coast Energy Authority and began delivering energy efficiency services across 17 rural Northern California counties in 2025. I have observed the commitment, dedication and innovation in the delivery of services by RCEA staff.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle. I encourage your review and approval of the submitted application so that services continue and more Californians have the opportunity to participate in energy efficient programs.

Sincerely,

Alan W. "Skip" Jorgensen

BURNT RANCH ELEMENTARY SCHOOL DISTRICT



PO Box 39
251 Burnt Ranch School Road
Burnt Ranch, CA 95527

Amanda Platt, Superintendent
Kristi Holland, Principal

Phone: 530.629.2543
www.bresd.org

Katie Strouse, Business Manager
Angela Wiltse, Administrative Assistant

March 13, 2026

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan
Application

Dear President Reynolds;

On behalf of Burnt Ranch Elementary School District, I am writing to express our support for the Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more in utility bill program dollars than they receive services and experiencing higher than average energy burdens. NREN was established in 2024 to address these gaps and began delivering energy efficiency services across 17 rural Northern California Counties in 2025, including residential energy assessments and rebates, small business incentives, public agency support, workforce education and training, and more.

With this 2028-2035 Business Plan application, NREN will conduct market characterization and needs assessment efforts to determine the best practices to extend those services to the remaining unserved Northern California customers, including Burnt Ranch School in Trinity County. NREN is committed to working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. We look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

Amanda Platt
Superintendent



President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-31 Business Plan Application

Dear President Reynolds,

On behalf of Valley Clean Energy (VCE), I am writing to express my support for the Northern Rural Energy Network's (NREN) application to the California Public Utility Commission (CPUC) to continue and expand its energy efficiency efforts in rural Northern California, including the proposed expansion to Yolo County.

The expansion of NREN to include Yolo County would be especially valuable in addressing energy challenges our customers face, especially along PG&E's Madison 2101 circuit – one of PG&E's five most outage-burdened circuits. VCE has heard from several agricultural customers that the unreliability of the circuit can be very challenging, limiting their ability to manage or expand their businesses.

Extending NREN coverage to Yolo County will help to reduce energy burdens and improve bill affordability by connecting households and small businesses to energy-saving improvements and incentives. VCE consistently receives feedback from customers that bill affordability is a very high priority; and the expanded access to no-cost guidance, direct-install measures, and rebates could meaningfully lower monthly utility bills and help residents stay safe during periods of extreme heat.

Services in Yolo County will be provided by the County of Yolo's Sustainability Division, which has a strong track record of program implementation success, having distributed nearly 200 energy efficiency kits to low-income unincorporated Yolo County residents in the second half of 2025 alone. VCE has worked closely with the County to implement programs that support residents, and has noted the County's success and dedication while serving the community. VCE worked with Yolo County to implement the Electric Advisor program, which offers no-cost technical assistance to customers seeking to make upgrades to their homes. This successful program could be expanded and offered to more customers through NREN. VCE sees the expansion of NREN into Yolo County as a key way to enhance and expand VCE's existing programs to serve more customers with the vital resources needed to encourage community resilience while addressing affordability and equity.

For these reasons, VCE supports NREN's 2028–31 Business Plan application, and encourages the CPUC to approve it, so that energy efficiency programs can better serve all Californians, including the rural and hard-to-reach customers in Yolo County.

Sincerely,
Rebecca Kuczynski

Chief Customer Officer
Valley Clean Energy

WILLITS SENIORS, INC.

1501 Baechtel Road · Willits CA 95490

707-459-6826 · 707-459-1772 (fax)

HARRAH SENIOR CENTER

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-35 Strategic Business Plan Application

Dear President Reynolds:

On behalf of the Willits Senior Center, I am writing to you to express my support for Northern Rural Energy Network's (NREN) application to continue and expand its energy efficiency efforts in rural Northern California.

Regional Energy Networks were established by the California Public Utility Commission to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs). Customers in rural Northern California have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens. Significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented programs is so essential. NREN was established in 2024 by the Redwood Coast Energy Authority, Lake Area Planning Council, Mendocino Council of Governments, and Sierra Business Council as a direct response to these needs. NREN began delivering energy efficiency services across 17 rural Northern California counties in 2025, including residential energy kits, home assessments and rebates, as well as public agency support, and is designing for launch in 2026 small business incentives, workforce education and training, and financing opportunities. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, working with community stakeholders to ensure California's energy efficiency programs serve all Californians, including the most rural and hard-to-reach customers. NREN will also expand its service territory; working toward a goal of covering all eligible customers in Northern California. I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely, Richard Baker Executive Director Willits Seniors Inc.

Richard Baker



Yolo County Housing Authority

147 W. Main Street
Woodland, CA 95695

Woodland: (530) 662-5428

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: Support for Northern Rural Energy Network's 2028-31 Business Plan Application

Dear President Reynolds,

On behalf of the Housing Authority of the County of Yolo (YCH), I am writing to express my support for the Northern Rural Energy Network's (NREN) application to the California Public Utility Commission (CPUC) to continue and expand its energy efficiency efforts in rural Northern California, including proposed expansion to Yolo County.

Regional Energy Networks were established by the CPUC to close gaps in energy efficiency programs caused by California's Investor-Owned Utilities (IOUs). Historically, customers in rural Northern California have had limited access to statewide and IOU-sponsored energy efficiency programs because of significant geographic distances, older housing stock, lower local jurisdictional capacity, and unreliable transmission lines. This expansion would be especially valuable for Yolo County to address the real energy challenges residents face, especially along PG&E's Madison 2101 circuit – one of PG&E's five most outage-burdened circuits, which experienced over 25 outages between 2022-2024.

Since 2025, NREN has begun delivering energy efficiency services across 17 rural Northern California Counties, including residential energy assessments and rebates, small business incentives, and public agency technical assistance, with a strong commitment to serving 44 of California's 109 recognized Tribes that are within NREN's service territory.

Through the 2028–31 Business Plan, NREN would expand to serve Yolo County, bringing its service area to 18 counties and 45 Tribes, extending these offerings to more than 220,000 Yolo County residents. This expansion will help reduce energy burdens and improve bill affordability by connecting households and small businesses to practical energy-saving improvements and available incentives. For the communities YCH serves, expanded access to no-cost guidance, direct-install measures, and rebates can meaningfully lower monthly utility bills and help residents stay safe and stable during periods of extreme heat and rising energy costs.

Services in Yolo County will be provided by the County of Yolo's Sustainability Division, which has a strong track record of program implementation success, having distributed nearly 200 energy efficiency kits to low-income unincorporated Yolo County residents in the second half of 2025 alone.



Yolo County Housing Authority

147 W. Main Street
Woodland, CA 95695

Woodland: (530) 662-5428

For these reasons, the Housing Authority of the County of Yolo supports NREN's 2028–31 Business Plan application and encourages the CPUC to approve it, so that energy efficiency programs better serve all Californians, including rural and hard-to-reach customers.

Sincerely,

Ian Evans

Ian Evans
Executive Director
ievans@ych.ca.gov
(530) 669-2219

CITY OF LAKEPORT

*Over 125 years of community
pride, progress and service*



1/12/2026

President Reynolds
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

RE: **Support for Northern Rural Energy Network's (NREN's) 2028-35 Strategic Business Plan Application**

Dear President Reynolds,

I am writing to express my strong support for the Northern Rural Energy Network's (NREN) Business Plan application to continue and expand its energy efficiency efforts and programs in rural Northern California.

Regional Energy Networks (RENs) were established by the California Public Utility Commission (CPUC) to fill gaps in energy efficiency programs provided by California's Investor-Owned Utilities (IOUs).

Customers in rural Northern California, including Lake County, have traditionally been unable to access statewide and IOU programs, contributing more to utility bill-funded efficiency programs than they receive in services while experiencing higher than average energy burdens.

NREN was established in 2024 by the Lake Area Planning Council, Mendocino Council of Governments, Redwood Coast Energy Authority, and Sierra Business Council as a direct response to a number of critical needs and began delivering energy efficiency services across 17 rural Northern California Counties in 2025. For Lake County these services include residential energy efficiency kits, home energy assessments and residential rebates for efficient appliances and other equipment. Furthermore, NREN is deeply committed to serving the 44 of California's 109 recognized Tribes that are within NREN service territory.

With this 2028-2035 Business Plan application, NREN will continue offering programs begun in this current cycle, expanding its program profile to cover commercial, public, and other needs in Lake County. I look forward to supporting NREN in those efforts and encourage you to approve the 2028-2035 Strategic Business Plan Application.

Sincerely,

E-SIGNED by Brandon Disney
on 2026-01-20 20:21:13 PST

Brandon Disney,
Mayor
City of Lakeport

cc: Lakeport City Council Members

APPENDIX D

ORDERING PARAGRAPH 2 STATEWIDE ASSESSMENT + SURVEY

Statewide Energy Efficiency Program Assessment Criteria

D.23-06-055 OP2 Statewide Assessment Framework

February 12, 2026

Overview Of PA Coordination Through a Working Group Process

PG&E led a working group of participating PAs to refine an IOU developed proposal for evaluating EE programs pursuant to OP 2 of D.23-06-055.¹ The original draft of the IOU proposal began development in the summer of 2025 by a small IOU only working group (WG). The IOU WG's goal was to prepare a guiding framework for further development by the broader PA group (RENs, IOUs and CCA). This effort resulted in a draft proposal that was circulated with all PAs for the October 16, 2025 monthly all-PA call. Subsequently, on November 5, 2025, there was a kick-off meeting to jump start an all PA WG to refine the proposal.² Non-IOU PAs were not included prior to November and were given a draft proposal developed by the IOU PAs.³ The WG's goal was to further refine the IOU developed proposal and to identify issues that the Commission would potentially need to address as part of this process. PAs were given the opportunity to provide feedback during the meetings and in redline/comment form on the draft proposal.⁴ While there were a number of useful edits and questions raised in the document not all PAs agreed to the

¹ The portfolio administrators (PAs) must coordinate among themselves and propose a statewide program portfolio assessment process to review and recommend changes to the portfolio of statewide programs. This proposed assessment process shall be included in the PAs' portfolio applications to be filed in 2026 or may be filed as a motion in Rulemaking 13-11-005 or its successor, if the proposal is ready before the next portfolio application filing.

² The WG met from November 2025 through January 2026 on a close-to-weekly basis. However, certain PAs could not participate at this frequency due to workload and bandwidth of staff.

³ The intent by the IOUs was to develop a starting point framework from which all PAs could use in order to address this complicated topic. The IOU developed straw proposal was intended to reduce the amount of time that it would take to develop a full proposal from scratch amongst the 12 PAs. Although, individual PAs were not precluded from developing their own proposal for submission as part of their Business Plan Application.

⁴ The original 10/15/2025 draft proposal received edits and comments, which were consolidated into a 12/31/2025 draft for further consideration. Not all PAs agreed to sign on to the developed draft with most providing a qualified support as reflected in the survey results (See Appendix B). An updated version of the document was released on 1/16/2026 for review and a survey for completion by PAs. Subsequently, another draft was released on 1/27/2026 before it was finalized by the end of January 2026.

proposed first draft; however, the WG discussions that ensued were useful in identifying areas needing additional development and/or formal Commission input.⁵

Supporting Information

In order to help stakeholders advance the OP 2 effort beyond this framework, the proposal includes supporting information in Appendices A and B. Specifically, Appendix A identifies issues that merit additional development and/or warrant formal input by the Commission; Appendix B includes results of a survey gauging general sentiment about the proposal along with PA specific feedback.

GUIDING PRINCIPLES - The following Guiding Principles represent the shared commitments of PAs in the delivery of statewide-administered energy efficiency programs.

1. Support the State’s energy efficiency policy goals. Orient portfolio design around State and Regulatory objectives and act in the best interests of all customers.
2. Do no harm. Make decisions that preserve our collective ability to meet energy savings goals, achieve TSB goals, achieve cost-effectiveness for the resource acquisition segment [IOUs only], and minimize impacts to existing local and downstream programs.
3. Advocate for all PAs. Recognize that the whole is greater than the sum of its parts. Be willing to collaborate with other PAs in planning and decision-making efforts.
4. Assume best intentions. In an environment of shared goals and shared directives, be humble in the approach and ambitious for the broader group’s success.
5. Be good listeners. Take responsibility for the environment by which decisions are made such that all participants have the opportunity to participate.
6. Take a stand for customers. Take into consideration the customer experience and strive for simplicity, clarity, and ease.
7. Wisely pursue change. Demonstrate open-mindedness to changes in design, delivery and administration

Programs should support customer fuel diversity,⁶ affordability and strategic decarbonization in a way that reflects the diversity of California’s energy landscape. To support customer demand, statewide program pathways should be diverse with multiple paths considered or incentivized.

⁵ Commission staff joined the December 22, 2025 WG meeting, which provided an opportunity for ED staff to hear about PA concerns. ED’s participation was intended to be informal with no expectation of official Commission guidance.

⁶ There is a diversity of perspectives on whether the offering of dual fuel programs should be discretionary or required.

STATEWIDE EE PROGRAM ADMINISTRATOR RESPONSIBILITIES – The following responsibilities are directed by D.18-05-041, and are the responsibility of any PA leading a SW program.

- Program vision development, design/delivery, and intervention strategies⁷)
- Procurement, contract administration, and co-funding management from partner PAs.
- Implementer oversight:
 - The lead PA would have sole responsibility for implementer management, rewards, and any necessary corrective action
 - Lead PA would review implementer performance and program performance on a quarterly basis
- Meeting savings goals and customer satisfaction levels
- Metrics development
- Reporting
- Fiscal oversight

OBJECTIVE

To provide a comprehensive, structured, and transparent framework for assessing Statewide energy efficiency programs across all portfolio administrators. This framework ensures that each program is evaluated for statewide suitability, delivery efficiency, strategic alignment, equity, and market impact. The assessment process supports informed decisions on whether programs should be maintained, redesigned, localized, sunset, transferred, or integrated, and guides the selection of lead administrators, all in alignment with California’s energy policy goals and stakeholder interests.

Program outcomes of the framework include:

- Continue as-is
- Redesign or expand
- Localize
- Sunset⁸

⁷ SW program leads may coordinate with other PAs to address matters that may not be resolved through ongoing SW coordination efforts under the “SWEET” (Statewide Energy Efficiency Team) process. The SWEET, represented by SW PA leads, meets bi-weekly to address ongoing matters associated with SW program administration.

⁸ Consistent with D. 21-05-031, OP 12, an assigned lead PA for a Statewide program can sunset a SW Program by means of a Tier 2 Advice Letter. Likewise, “a Tier 2 advice letter is also required when an existing program is being elevated from a local or regional program to a proposed statewide program or when the lead administrator for a statewide program is proposed to change.” Furthermore, D.23-06-055, dicta at p. 10 states: “Meanwhile, during 2024-2027, the composition of the statewide portfolio need not remain static.

- Reassign to another PA (IOUs, RENS, and CCAs)
 - Selection of Lead PA
- Elevate to Statewide
 - Selection of Lead PA (IOUs, RENS, and CCAs)

GUIDELINES FOR ASSESSMENT

- **Customer Affordability:** Identify EE programs that help customers achieve measurable energy and demand reductions that translate into lower utility bills.
- **Ratepayer Affordability⁹:** Identify EE programs that deliver measurable value to ratepayers, with a focus on maximizing energy savings, benefits per dollar spent, and bill relief.
- **Efficient Program Delivery:** Focus on optimizing resource acquisition and/or customer benefits as appropriate based on program segmentation, and minimizing *redundant*¹⁰ programs.
- **Equity:** Design programs to deliver to disadvantaged, underserved, and hard-to-reach communities (collectively referred to in this document as “equity criteria”).¹¹
- **Transparency:** Use standardized, data-driven methodologies across all PAs, including customer data sharing to support claimable EE results.
- **Timing:** Assessment should be completed in time for results to be incorporated into Application, TUAL, or MCAL cycles.¹²

PAs may request program closure or downsizing where a statewide resource acquisition program has declining prospects through the filing of a Tier 2 advice letter. In addition, existing programs may also be modified by updating an implementation plan.”

⁹ The initial draft proposal advanced “Affordability” as an over-arching assessment factor. However, at the tail end of the WG effort, one PA distinguished affordability between *customer* and *ratepayer*. While this distinction was not fully vetted by the WG, a PA did express concern about using “ratepayer affordability” due to the complexities involved. On the other hand, this same PA indicated that “customer affordability” is more easily determined as it can be isolated/attributed to a single program. This issue warrants further examination.

¹⁰ The Working Group discussion revealed certain PAs had concerns about “relitigating” aspects of OP 32 from D.23-06-055, which commissioned a study “to provide information on substantively similar programs, and steps they have taken and will take to mitigate or minimize ratepayer risk of program overlap and duplication.” There is currently the Joint Coordination Memo (JCM) process that is intended to look at the overlap/duplication issue. However, it’s recognized there may be some level of strategic overlap that is acceptable based on a program’s profile.

¹¹ *Equity Criteria:* The use of the term disadvantaged is in the context of Disadvantaged Communities (or DACs) as identified by the California Environmental Protection Agency pursuant to Health and Safety Code Section 39711. With respect to the use of the terms underserved and hard-to-reach, these are defined by CPUC Decision 23-06-055, COL 31, for underserved; and COL 33 for hard-to-reach. It should be noted that COL 32 provides flexibility to include additional groups within the underserved population based on the mechanism set forth by COL 32.

¹² There is lack of consensus as to the appropriate forum and timing of these assessments. While the ability to undertake more frequently is preferable, the potential need for incremental funding and full regulatory vetting would generally point to the Application funding cycle as the best pathway. However, PAs appear to

STATEWIDE ASSESSMENT FRAMEWORK

This framework supports a right-sized, effectively delivered, and efficiently administered statewide EE portfolio that aligns with today’s EE policy direction, market dynamics, and EE strategic priorities such as customer energy savings, cost-effectiveness, decarbonization, equity, and flexible delivery. It’s built on a series of gatekeeping questions split into sections (i.e., Sections 1-5) that aids the reviewer¹³ in undertaking the assessment of the program in question. These questions are intended to be guides rather than absolute requirements in supporting the assessment process.

Figure 1. Overall Decision-Making Framework



support the ability to undertaking assessments more frequently, potentially as part of the TUAL and MCAL or as part of a separate dedicated filing process (e.g., a Tier 3 submission).

¹³ Informally, the Energy Division clarified that the undertaking of assessments would generally be PA driven and should be fair, unbiased, and consensus-driven.

Section 1. Statewide Program Gatekeeping Questions (New and Existing Programs)

The assessment of statewide or regional programs will begin with the following baseline questions based on its segmentation:¹⁴

Criteria	Yes/No
For Resource Acquisition Programs	
Does the program ensure inclusion of all critical resources (gas and electric) necessary to maintain reliability, affordability, and customer choice during the transition? [See FN 6]	
Is the program truly mass-market ¹⁵ and uniform for both gas and electric across territories (e.g., smart thermostats)? [See FN 6]	
Does it use a non-site-specific delivery model including both fuels (e.g., original definition of midstream)? [See FN 6]	
Is the PA delivering program able to reasonably manage cross-utility risk without territorial control or data sharing challenges and barriers?	
Does the program solve an identified, statewide problem that cannot be effectively addressed by local or regional means?	
Does implementing statewide delivery significantly improve cost-effectiveness or enhance customer access compared to a local or regional delivery model?	
For Market Support¹⁶ Programs	
Is the program's primary objective to support the statewide market rather than deliver immediate resource savings?	
Does the program target a statewide market failure or gap that cannot be addressed effectively by resource acquisition programs? (e.g., lack of supply chain readiness, emerging tech adoption, training/workforce?)	
Are there measurable market transformation indicators (market share, cost declines, codes/standards advancement) that can be tracked and are consistent throughout the state?	
Is there detailed evidence that statewide delivery would accelerate or amplify measurable market effects compared to local delivery?	

¹⁴ While Section 1 is limited to the Resource Acquisition, Market Support and Equity segments, this framework can be applied to Codes and Standards (C&S) along with Workforce, Education and Training (WE&T). Since future refinements to this framework are anticipated these additional segments could be developed at that time.

¹⁵ Mass Market refers to broad market segments, like residential homes and small businesses, which share similar purchasing patterns and are targeted for energy-saving programs through accessible measures like rebates, simple installation processes, and standardized information.

¹⁶ Decision 21-05-031 at p.14 defines Market Support as "Programs with a primary objective of supporting the long-term success of the energy efficiency market by educating customers, training contractors, building partnerships, or moving beneficial technologies towards greater cost-effectiveness."

For Equity¹⁷ Programs	
Is the program's primary objective to improve access, affordability, or resilience for meeting the needs of equity criteria populations (DAC, Hard-to-Reach, Underserved) statewide, rather than delivering energy savings or cost-effective benefits?	
Is the program reaching the intended equity criteria target populations?	
Are incentives and program processes aligned with accessibility and ease of participation for equity criteria target participants?	
Does the program address statewide barriers (financial or geographic) that limit participation by equity criteria communities?	
Is there a clear plan to engage trusted messengers (e.g., CBOs, tribal organizations, local governments) across the entire state?	
Is there detailed evidence that statewide delivery can create measurable improvements in equity criteria outcomes for the specific program, when compared to local-only delivery?	

If less than a majority¹⁸ of answers are “No,” the program should not be statewide.

IF more than a majority of questions were answered as YES, continue on to Section 2.

For NEW and EXISTING PROGRAMS which pass Section 1, CONTINUE

Section 2. Delivery Model and Risk Evaluation

Question	Consideration	Yes/No
Does the program use a midstream delivery model?	<i>Sales-only (midstream/upstream) vs. install-based (downstream/direct install)</i> Midstream= Yes Downstream= No Upstream= Yes	
Is the model still aligned with CPUC policy?	<i>E.g., does it still meet the intent of midstream?</i>	

¹⁷ Decision 21-05-031 at p.14-15 defines Equity as “Programs with a primary purpose of providing energy efficiency to hard-to-reach or underserved customers and disadvantaged communities in advancement of the Commission’s Environmental and Social Justice (ESJ) Action Plan; Improving access to energy efficiency for ESJ communities, as defined in the ESJ Action Plan, may provide corollary benefits such as increased comfort and safety, improved indoor air quality, and more affordable utility bills, consistent with Goals 1, 2, and 5 in the ESJ Action Plan.

¹⁸ The threshold for “majority” should be established by the PAs and/or set by the Commission. In some cases a simple majority (i.e., greater than 50%) is sufficient and in other cases a “super-majority” might be appropriate (i.e., greater than 66.6%).

Is downstream data collection or quality verification unnecessary for this program?	<i>If yes, it may be feasible for statewide. Although, gathering downstream data for all participants is complex and burdensome in SW offerings.</i>	
Is the administrative burden on the lead PA proportionate to the value delivered?	<i>Legal, regulatory, QA/QC, EM&V risk, data sharing, etc.</i>	

If at least three (majority) of the answers are YES, continue onto Section 3.

If more than one of the answers are NO, consider LOCALIZATION, REDESIGN, or SUNSET program.

Section 3. Strategic Fit

Question	Yes/No
Does the program align with the (or latest) Business Plan (e.g., decarbonization, equity, electrification)?	
Does the program align with the CPUC's policy objectives as stated in decision language or Public Utilities Code statute?	
Does the program avoid overlapping with or negatively impacting existing local delivery options?	

If at least two (majority) of the answers are YES, continue to Recommendations.

If more than one of the answers are NO, consider LOCALIZATION, REDESIGN or SUNSET program.

Section 4. Performance and Accountability Assessment (EXISTING)

Metric	Assessment Notes	Yes/No/NA
Is the program achieving program goals and metrics? (TSB, GWh, MW)	Is it performing as expected?	
Is the program contributing to portfolio goals?	Is it advancing decarbonization, fuel substitution, etc.?	
Is the program cost-effective (applies only to RA)?	Is it successfully delivering cost effective savings, or failing the TRC tests?	
Is the program forecasting accurately?	Is the program accurately forecasting TSB, GWh, MW and budget?	
Is the program demonstrating clear signs of growth and scalability?	Is it scaling or stalling?	

Are there minimal barriers to participation or savings realization?	Market, tech, permitting, site-specific issues?	
Have past corrective actions, if any, been successful in correcting program performance?	Have the actions been successful in correcting program performance?	

If majority of the answers are YES, continue onto Section 4.

If majority of the answers are NO, consider REDESIGN, LOCALIZE, or SUNSET program.

Section 5. Market Support & Equity Assessment

Question	Yes/No
Market Support – Focus on supporting long-term success of the market, enabling market viability and innovation	
Does statewide administration reduce market confusion and create consistent signals to manufacturers, distributors and contractors?	
Are the risks of statewide delivery (e.g., uneven market maturity, inconsistent supply chains) outweighed by benefits of a statewide approach?	
Are there clear measurable indicators of long-term success of the energy efficiency market that can be tracked at a statewide level?	
Would statewide delivery meaningfully accelerate innovation or technology adoption compared to local implementation?	
Equity – Focuses on equity criteria population	
Would statewide delivery ensure consistent access and reduce inequities across service territories?	
Can program risks (such as differing local needs or reliance on CBOs) be managed affordably and effectively at a statewide scale?	
Are there equity specific outcomes that can be measured and reported consistently statewide?	
Has or will the program demonstrate the ability to overcome participation barriers at scale?	
Would statewide delivery expand reach and scale and benefits in a way local delivery could not?	

If majority of the answers are YES, continue onto Assessment Recommendations.

If majority of the answers are NO, consider REDESIGN, LOCALIZE, or SUNSET program

ASSESSMENT RECOMMENDATIONS

Summary of the above scoring system, and assessment recommendation.

Suggested Program Reclassification Options

Recommendation	Description
If Section 1-5 result in YES	
Maintain or Launch Statewide	Only if program meets all core criteria and delivers value
If Section 1-5 results in NO Options below	
Redesign or Maintain as a local program	If program needs local tailoring, complexity makes it better as a local or regional offer
Sunset Program	If program is obsolete, low-performing, or creates administrative risk
Transfer to non-IOU PA or State Agency	Consider having non-IOU PAs (e.g., RENs, CCAs) or state agencies (e.g., CEC) run the program; IOU acts as fiscal agent only
Integrate into existing local programs	Fold into existing contracts/programs to improve customer experience and delivery efficiency

Compliance Check Before Final Recommendation	Yes/No
Will recommendations cause any IOU to fall below the 20% statewide funding requirement, exceed the 30% MS+E cap, jeopardize meeting the TSB goal or affect any other compliance requirement?	
If a CCA program is converted to SW, will CCA still maintain cost-effective portfolio requirement?	
CONSENSUS CHECK BEFORE SUBMITTING PROPOSAL	Yes/No
Was consensus reached among all PAs regarding the assessment results and proposed outcomes?	

Before proposing the assessment outcomes in the appropriate filing mechanism, the party conducting the assessment may conduct regional focus groups to gather community input across the state. These focus groups should include specific questions that guide feedback and inform the proposing PA if the SW proposal is still appropriate as designed, or redesign, localize or sunset. The results of this effort shall be reported when the party proposes the assessment outcomes in the filing process.

SELECTION/TRANSITION OF LEAD PA

Stakeholder Involvement

- Ensure a transparent and inclusive selection process by actively engaging stakeholders such as other IOUs, RENs, and CCAs.
- Solicit stakeholder feedback through options such as, but not limited to, public workshops, comment periods, or advisory panels.

Qualification Criteria:

Define clear, objective criteria for selecting the lead PA, including but not limited to:

- **Relevant Experience and Track Record:** Demonstrated history of successfully administering similar programs, including past performance metrics and lessons learned.
- **Market Expertise:** Understanding of the target market, including customer segments, supply chain dynamics, and regulatory requirements.
- **Training Infrastructure and Workforce Support:** Ability to provide training, technical assistance, and workforce development to support program delivery at scale, if needed.
- **Data Management and Reporting Capabilities:** Robust systems for data collection, analysis, and reporting, ensuring compliance with CPUC requirements and enabling transparent program evaluation and data sharing capabilities with other non-lead PAs.
- **Contract and Solicitation Resources:** Capacity to manage competitive solicitations, vendor contracts, and procurement processes efficiently and fairly.
- **Past Performance:** Evidence of meeting or exceeding program goals, maintaining compliance, and effectively managing budgets and timelines.
- **Interest and Commitment:** Clear expression of willingness and capacity to lead the statewide program, including resource allocation and organizational support.

NEW PROGRAM PA SELECTION PROCESS :

- Interested Lead PA successfully completes the assessment
- Interested Lead PA presents assessment results and proposed outcomes to all PAs¹⁹ (*Engage in good faith effort to reach consensus among PAs*)
- Interested Lead PA proposes SW Program concept in an appropriate filing mechanism as determined by CPUC input.
- The CPUC approves or denies SW Program.

TRANSITIONING PROGRAMS PROCESS (transitioning programs):

- Current Lead PA coordinates with PAs to inform PAs of proposed transition
- Current Lead PA receives input and response to proposed transition
- Allow all PAs to submit proposals or statements of interest
- Current Lead PA engages in good faith effort to reach consensus among PAs
- Current Lead PA makes a recommendation via Tier 2 AL per D.21-06-055
- Current Lead PA announces the newly selected lead PA

¹⁹ D.18-05-041 at pp. 80-81 provides guidance on lead PA coordination.

Appendix A

Issues Needing Further Development and/or Clarification by the Commission

1. Scope of OP 2: The full scope of OP 2 was unclear to all PAs. Specifically, whether the assessment was intended to include both upleveling (local/regional to statewide) and down-leveling (SW to local/regional) of programs. While the language of OP 2 addresses the evaluation of SW programs and the related dicta²⁰ is suggestive of upleveling, there is no language indicative of down-leveling. The bullet points below summarize the three discrete possibilities.

- SW only [language of OP 2]
- Local/regional to SW (uplevel) [language of dicta]
- SW to local/regional (down-level)

Action Item: Formal Commission input warranted.

2. Regulatory Process for Proposing a SW Program: While PAs seek maximum flexibility in undertaking the OP 2 assessment, there is lack of clarity about the appropriate venues for doing so. While there is general consensus that the Application cycle is an appropriate venue, some PAs believe the TUAL and the MCAL could also be vehicles for advancing OP 2. Moreover, there is consideration as to whether a separate dedicated process, such as a unique Tier 3 filing, could also be a viable mechanism. The one potential impediment is that in certain cases incremental funding might be necessary, which is generally requested and approved as part of the periodic EE Application. In the case of a regional or local program being converted to SW, PAs would need the appropriate venue to rebalance their remaining portfolio and address any implementation issues (see #4 below).

Action Item: Formal Commission input warranted.

3. Applicability of dual fuel or single fuel: There is a diversity of perspectives on whether the offering of dual fuel programs should be *discretionary* or *required*.

Action Item: Formal Commission input warranted.

²⁰ *In comments on the proposed decision, numerous parties, including Oracle as one of the implementers, opposed the conversion of these two programs to statewide administration, arguing that they have unique characteristics at the individual IOU level and are not appropriate for statewide implementation. In light of these comments, we will defer on converting these programs to statewide at this time. Once a statewide assessment process has been proposed and approved, then we will use the process to evaluate whether these programs should be converted to statewide during the next portfolio application cycle.*

4. Attribution: It is understood that moving a local/regional program to a SW program would preclude program benefit attribution for non-IOU PAs, which presents a challenge for maintaining a cost-effective portfolio and performance at a PA level. Several solutions are available to the Commission including, but not necessarily limited to the following:

- Equal attribution of Statewide Program TSB benefits and costs to all PAs.
- Cost-effectiveness/performance adjustment or relief to impacted non-IOU PA(s).

Action Item: As many EE policies are impacted by potential changes in attribution, cost-effectiveness or program delivery model, the Commission should scope further discussion in R.25-04-010 (EE proceeding) – or the upcoming consolidated Business Plan Application proceeding - to ensure that any solutions are holistic and informed by the public record.

5. Responsibility for Undertaking the Assessment: The PAs generally agree that the assessment process is PA led, which is consistent with the informal perspective shared by Energy Division during the December 22, 2025 working group call. There were no objections to the idea that a PA could engage a third-party entity to facilitate or even to undertake such an assessment.

Action Item: Request Commission to affirm the assumption that the assessment process is PA driven rather than by the CPUC.

Appendix B
PA Survey
Updated 2/12/2026

Each PAs was asked to complete a survey with the four questions shown below. Based on the results, all of the respondents selected a “Qualified Support” for the proposal. Certain PAs also provided responses to questions three and/or four. Each PA’s survey response is included in this Appendix B.

1. Which Program Administrator (PA) do you represent?

Enter the full name of your PA (please provide one survey response per PA).

2. Do you support the statewide assessment proposal for evaluating programs?

*Select one option that best represents your position (please **bold** and underline your selection).*

- Yes
- **Qualified Support**
- No

3. If you selected “Qualified Support” or “No,” briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

NREN

1. Which Program Administrator (PA) do you represent?

Enter the full name of your PA (please provide one survey response per PA).

Northern Rural Regional Energy Network (NREN)

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please **bold** and underline your selection).

- Yes
- **Qualified Support**
- No

3. If you selected “Qualified Support” or “No,” briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

NREN appreciates the time and effort from the PAs during this process to create a statewide portfolio assessment process. At this time, NREN would like additional clarity of certain assessment questions, and would like to review the new clean version closely.

Overall, NREN understands the assessment process and agrees with the guiding principles, but would like to reiterate the gap-filling purposes of RENS that should be kept in mind when an assessment of a regional or local program is taking place.

Additionally, NREN would like to note that not all PAs were represented throughout the entire process of developing this proposal, which may indicate unequitable representation of PAs.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

It is noteworthy that Joint Cooperation Memos (JCMs) already exist to limit program overlap and ensure PA coordination, and that regional programs all differ from each other as they are unique to each region. These JCMs and other means of coordination should be taken into account when conducting an assessment.

BayREN

1. Which Program Administrator (PA) do you represent?

Enter the full name of your PA (please provide one survey response per PA).

BayREN

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please **bold** and underline your selection).

Qualified Support

3. If you selected “Qualified Support” or “No,” briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

BayREN appreciates the participation of the PAs and the collaborative effort to produce a statewide portfolio assessment proposal. BayREN offers qualified support for the proposal and will provide more reasoning for our qualified support in our business plan application. BayREN would like more time to evaluate the proposal to determine if it agrees with what has been drafted.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

3C-REN

1. Which Program Administrator (PA) do you represent?

Tri-County Regional Energy Network (3C-REN)

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please **bold** and underline your selection).

- Yes
- **Qualified Support**
- No

3. If you selected “Qualified Support” or “No,” briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

3C-REN offers qualified support for the statewide assessment proposal and will provide more reasoning for our qualified support in our business plan application after having more time to review a clean copy. Some items we will use the additional time to review include:

- Proposed Scope (Upleveling v. Down-leveling)
 - 3C-REN leans toward relying on the explicit decision language, which focuses on the evaluation of existing statewide programs. If the Commission ultimately relies on the dicta to support upleveling, it is important that this approach be balanced with a fair and equal pathway for down-leveling where appropriate.
- REN programs operating in tandem with statewide programs
 - 3C-REN wants to ensure that even if a statewide program passes the assessment matrix and does not require localization, this should not preclude the continued delivery of localized programs where they improve equitable access.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

SoCalREN

1. Which Program Administrator (PA) do you represent?

Enter the full name of your PA (please provide one survey response per PA).

Southern California Regional Energy Network (SoCalREN)

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please **bold** and underline your selection).

- Yes
- **Qualified Support**
- No

3. If you selected “Qualified Support” or “No,” briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

The SoCalREN believes there should be an assessment regarding the efficacy of the current statewide programs. It would benefit the state to understand are statewide program performing proportionally across the state or are their communities or pockets of regions not being reached. Are rate payer dollars being effectively utilized for mid-stream and up-stream models or is there too little oversight to understand where SW ratepayer dollars are actually being realized into impact. These are just a few questions and much more could be identified.

The SoCalREN does support some portions of the proposal for instance the gate assessment process for considering a PA's proposal for a program to be delivered statewide. However, their lacks certain nuances that must be considered. For instance in the assessment for considering a program be delivered SW there should exist a requirement that the PA engage communities in some form across the state to acquire input. Many communities are often disenfranchised by statewide programs due their standardization. In addition, SW proposals should only be considered in Applications which require Commission approval.

SoCalREN intends to file an alternate proposal that captures some of the Joint PAs work and builds off of it.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

None at this time.

MCE

1. Which Program Administrator (PA) do you represent?

MCE

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please **bold** and underline your selection).

- Yes
- **Qualified Support**
- No

3. If you selected “Qualified Support” or “No,” briefly explain your reasoning.

MCE does not agree with the threshold criteria for each set of scoring questions and notes that there are logical errors in the proposed thresholds. For some sets of criteria a “majority” may not be sufficient, and a program should pass all screening criteria to be considered for statewide implementation. There should be further discussion to refine the threshold criteria for each section.

Other comments will be provided in MCE’s testimony.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

SDREN

1. Which Program Administrator (PA) do you represent?

Enter the full name of your PA (please provide one survey response per PA).

San Diego Regional Energy Network

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please **bold** and underline your selection).

- Yes
- **Qualified Support**
- No

3. If you selected “Qualified Support” or “No,” briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

- SDREN supports the proposal if it is not used to relitigate currently authorized programs.
- SDREN supports the proposal if it is conducted by an independent third party.
- SDREN supports the proposal if the “ratepayer affordability” language under “Guidelines for Assessment” is removed. There are many bill components that impact ratepayer affordability (e.g., generation, transmission, and distribution) so assessing singular programs using this as a guideline is infeasible. The “customer affordability” language under the “Guidelines for Assessment” section is more easily determined and can be isolated/attributed to single programs. Therefore, SDREN supports the “customer affordability” language and recommends “ratepayer affordability” be removed. Additionally, this language was added last-minute and was not discussed with the full PA group prior to including.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

I-REN

1. Which Program Administrator (PA) do you represent?

Enter the full name of your PA (please provide one survey response per PA).

Inland Regional Energy Network (I-REN)

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please bold and underline your selection).

- Yes
- **Qualified Support**
- No

3. If you selected “Qualified Support” or “No,” briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

At the time of this survey I-REN offers “qualified support” rather than full support or non-support of the proposal and will provide additional detail in our forthcoming business plan application. I-REN appreciates the framework’s reiteration of the guiding principles of good-faith PA consensus and coordination. While this point is identified in the overview, it is worth highlighting in these comments that the development of this proposal only included REN and CCA PAs a few months after IOUs initiated the effort exclusively. Nevertheless, I-REN participated in this effort in good faith and will continue to identify refinements to the framework to promote equity among PAs between now and the business plan application submittal.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

I-REN would like to thank all PAs involved in this effort for their contributions, and restate the importance of local and regional efforts led by RENs to provide equity communities with critical support and market access.

CCR REN

1. Which Program Administrator (PA) do you represent?

Central California Rural Regional Energy Network (CCR REN)

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please **bold** and underline your selection).

- Yes
- **Qualified Support**
- No

3. If you selected “Qualified Support” or “No,” briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

We have some small comments in the draft we would like to be considered.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

Not at this time.

SDG&E

1. Which Program Administrator (PA) do you represent?

Enter the full name of your PA (please provide one survey response per PA).

SDG&E

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please **bold** and underline your selection).

- Yes
- **Qualified Support**
- No

3. If you selected “Qualified Support” or “No,” briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

The requirement that PAs conduct regional focus groups to gather community input, as proposed by SCR, should be optional rather than mandatory, as regional focus groups may not be practical on a statewide basis.

The proposed transition of a statewide lead PA is also allowed to be requested within the Business Plan Applications per the Energy Division template, not only Tier 2 Advice Letter.

Already resolved in the draft: SDG&E supports majority versus 80% supermajority within the gating questions.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

SCE

1. Which Program Administrator (PA) do you represent?

Southern California Edison

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please **bold** and underline your selection).

- Yes
- **Qualified Support**
- No

3. If you selected “Qualified Support” or “No,” briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

SCE is generally supportive of the Statewide Assessment proposal; however, SCE emphasizes that this assessment should include regional programs and notes that the assessment should not be used as a basis for program closures, as an established process and procedure for closing programs already exists.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

SoCalGas

1. Which Program Administrator (PA) do you represent?

Enter the full name of your PA (please provide one survey response per PA).

SoCalGas

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please **bold** and underline your selection).

- Yes
- **Qualified Support**
- No

3. If you selected “Qualified Support” or “No,” briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

The proposal should heavily weigh the customer’s best interest and provide the structure to allow utilities to adapt program designs for customer benefit.

PG&E

1. Which Program Administrator (PA) do you represent?

Enter the full name of your PA (please provide one survey response per PA).

PG&E

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please bold and underline your selection).

- Yes
- **Qualified Support**
- No

3. If you selected “Qualified Support” or “No,” briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

There are unresolved issues that merit further development and/or formal CPUC input. These are noted in the body of the proposal (primarily as footnotes) and/or summarized in Appendix A.

PG&E’s perspective continues to be that the lead-PA of any SW program should have the ability to make program specific decisions, specifically allowing the lead-PA to determine whether a SW program is single or dual fuel. PG&E provides additional context in its testimony.

PG&E requests stakeholders consider this perspective when reviewing the proposal.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

PG&E volunteered to facilitate this all-PA process as it wasn’t obvious if any other PA had interest in doing so. It is understood that efforts of this nature, which involve a dozen PAs is both challenging and time consuming. In hindsight this process would have been better suited to a professionally facilitated working group, which could have included formal workshops with Energy Division staff participation. Even so, PG&E appreciates ED staff joining one of our weekly meetings on December 22, 2025, in order to entertain PA questions and to share *unofficial* thoughts on OP 2. Also, PG&E appreciates the collaborative engagement by the PAs.

PG&E believes this proposal is a reasonable starting point for further development by the Commission and interested stakeholders. Further discussion and context on the unresolved items is located in PG&E’s testimony.

APPENDIX E

ORDERING PARAGRAPH 23 DEMOGRAPHIC DATA REPORTING DELIVERABLE

Background

D.23-06-055 OP 23 requires “Portfolio administrators shall work with the Reporting Policy Coordination Group to jointly submit a report addressing the demographic questions in Section 7.7 of this decision by no later than September 1, 2025. Based on analysis included in the report, the portfolio administrators shall propose, in their next portfolio proposals due in 2026, their preferred approaches to regular reporting of demographic energy efficiency program participation information.”

Questions within Section 7.7 include:

1. What are the most feasible options to accurately assess energy efficiency program participation by different demographic groups? Are there more efficient or less costly methods (i.e., using geographic, census, survey, or other data) of regularly assessing demographic participation in energy efficiency programs compared to collecting information from each program participant?
2. What, if any, demographic data is already being collected (and for which programs)?
3. What types of demographic data could be collected for energy efficiency program participation?
4. For which segments, sectors, and programs should this data be collected?
5. Where should this data be reported and stored?
6. What should be the timeline for PAs to begin reporting participation by demographic group?
7. What should the frequency be for reporting demographic participation data?

Process

To undertake this process, the Reporting PCG was engaged at the January 2025 meeting, and was provided information on OP 23, which requires a joint report. The following steps were identified to produce the OP 23 report:

Step 1: Establish a separate Reporting PCG working group to develop the report. PG&E was the lead PA in facilitating the working group.

Step 2: Have a kick-off meeting to discuss the requirements of OP23 and establish the process. Meet monthly thereafter.

Step 3: Develop a data collection template to collect each PA’s response to each question.

Step 4: Discuss areas of consensus and non-consensus to find common ground.

^[1] California Energy Data and Reporting System: [Home - CEDARS](#)

Step 5: Review a draft of the report with the Reporting PCG at the June 2025 PCG meeting.

Step 6: Report is finalized by the lead and sent to PAs and Energy Division Staff.

PA Responses

Each PA's individual responses to the questions are provided in excel attachment "D.23-06-055 OP23 PA Data Collection.xlsx." A summary where PAs had consensus and where differing viewpoints occurred is provided in the discussion below.

Discussion

1. What are the most feasible options to accurately assess energy efficiency program participation by different demographic groups? Are there more efficient or less costly methods (i.e., using geographic, census, survey, or other data) of regularly assessing demographic participation in energy efficiency programs compared to collecting information from each program participant?

The majority of PAs agree that using geographic and publicly available data is a cost-effective and scalable method for assessing energy efficiency program participation by demographic groups. They emphasize that demographic data collection should be voluntary and not a requirement for program participation. One way to achieve this is for PAs to provide the census tract for each project as part of the site information in CEDARS^[1] claims. This approach avoids adding survey burdens to PAs and leverages existing data, such as census tracts and utility account information, to analyze demographic participation without requiring new or invasive data requests from customers. As an additional data collection method, NREN suggests gathering demographic data through registration questions, surveys, and market assessments but acknowledges the limitations of low response rates.

While CCRREN agrees with using geographic and publicly available data, they suggest using mapping software to layer addresses on census tracts and propose that demographic data collection be included in EM&V study workplans. 3C-REN supports CCRREN's approach for programs that already collect addresses, noting that collecting clean address data for programs that do not already collect it, such as workforce programs, could require a significant timeline.

^[1] California Energy Data and Reporting System: [Home - CEDARS](#)

Lastly, SCE argues that using public demographic data cannot accurately assess the actual breakdown of participants. Instead, they advocate for direct data collection or sampling if an individual breakdown of participants is required by the CPUC. SoCalREN also agrees with SCE's position and are also advocating for direct data collection or sampling if an individual breakdown of participants is required.

2. What, if any, demographic data is already being collected (and for which programs)?

As this is program specific, please refer to the attached spreadsheet for each PA's response.

3. What types of demographic data could be collected for energy efficiency program participation?

PAs are mostly aligned on the types of demographic data that could be collected including customer IDs for participating customers that can be linked to geographical and other customer information such as rate code, CARE/FERA/ESA participation, NEM participation, census block group, preferred billing language, dwelling types, service types, and annual usage amounts. The census block group data point can be used to further link to disadvantaged community status, overall census data, average community incomes, and average age and race demographics within a given community. SoCalREN notes that census data can provide extensive insights into where projects are being implemented and helps identify which communities benefit most from the programs. There is also a consensus on the need for voluntary surveys to avoid creating barriers to participation.

CCRREN emphasizes that demographic data beyond what is currently required for participation in various programs should be collected during EM&V and be defined and agreed upon in the approved EM&V work plan. SCE believes that any demographic data could be requested but notes that verifying and trusting the collected data is a challenge and could lead to reduced participation. Lastly, SDG&E adds that additional data collection should only occur for local and regional programs participants, not statewide participants.

4. For which segments, sectors, and programs should this data be collected?

PAs agree that demographic data is most applicable to analyze Residential, Public, and Commercial Programs. 3C-REN, SDREN, SoCalREN, BayREN, NREN, and I-REN include Workforce Education & Training (WE&T) programs in their scope. 3C-REN highlights that customer IDs might not be applicable for WE&T programs where participants register for

^[1] California Energy Data and Reporting System: [Home - CEDARS](#)

classes without providing utility customer IDs. PG&E also notes that they do not currently report participants of WE&T programs into CEDARS.

CCRREN offers caution in the approach for commercial and public sectors, stating that demographics of those entities must be tailored to their organizational structure to mitigate data on the individual. In addition, CCRREN suggests that data should be collected during EM&V starting with the residential sector and expanding to commercial and public sectors in a phased-out approach.

Lastly, PG&E notes that demographic analysis may provide little insight within programs with randomly selected treatment and control groups (such as home energy reports) but that including these programs can be useful for analyzing groups at the portfolio level.

5. Where should this data be reported and stored?

PAs agree that required data points should be collected in claims and emphasize the importance of minimizing changes to the current reporting process. There is also consensus around collecting minimal information like census block groups that can later be tied to other demographic information by evaluators. SDG&E suggests that the new proposed Site Information data could be used to enhance CEDARS visualizations and improve access to program performance data.

CCRREN recommends that demographics collected during EM&V should be stored using existing structures to link values to claims data. They advise against adding additional reporting data points, arguing that site and participant addresses can be easily mapped onto census tract polygons. They believe that the benefits of collecting and reporting census tract data in claims data do not justify the costs to ratepayers, especially since this mapping can be done at scale afterward. Finally, I-REN, BayREN, CCRREN, 3C-REN, and NREN assert that the responsibility for mapping addresses to census tracts should lie with the CPUC, not the PAs.

Lastly, SoCalREN does not agree that the responsibility for mapping addresses to census tracts should lie with the CPUC. Census tract data is publicly available and there are many existing tools that can be leveraged that are specific to PA service territory. PAs should be responsible for this type of data mapping and reporting.

6. What should be the timeline for PAs to begin reporting participation by demographic group?

There is broad alignment that PAs should report demographic group participation only after clear CPUC guidance and 6 months to implement new collection processes. SoCalREN notes that if their recommendation to use existing PII for demographic assessment is

^[1] California Energy Data and Reporting System: [Home - CEDARS](#)

adopted, an added benefit would be the ability to apply a consistent methodology across PAs and over time to claims from previous years, with no additional effort required from PAs. SCE believes the timeline for PAs to begin reporting should coincide with the next available Application period and the requirements and guidance should be included in the Decision for that Application period to ensure consistency throughout the application period. Lastly, CCRREN states that no additional demographic information or timelines are necessary if their recommendations are adopted.

7. What should the frequency be for reporting demographic participation data?

PAs agree that annual reporting for metrics and quarterly reporting for claims related data should be sufficient. If CCRREN's recommendations are adopted, where Site Address is used to map against census tract data in aggregate and additional demographics are collected during EM&V, no further demographic information is needed, and therefore no specific timelines are applicable. 3C-REN is in support of CCRREN's recommendation for programs that already collect addresses, but notes that this is not possible for programs that do not already collect address information or collect address information that is not reported into CEDARS (e.g., for WE&T and C&S participants).

Conclusion

The PAs thank the CPUC for the opportunity to provide feedback on this important issue. We collectively would like to ensure that the path taken provides (1) the most consistent method for tracking this information among PAs' programs and (2) that any data collected is done in an administratively responsible manner, to maximize the value to ratepayers. The PAs request the CPUC will continue to engage with the Reporting PCG as policy around this topic is developed.

^[1] California Energy Data and Reporting System: [Home - CEDARS](#)

Deadline	Date
1st WG Meeting (discuss questions & PG&E draft answers)	Monday, March 17, 2025
Draft excel responses due from all PAs	Monday, April 14, 2025
2nd WG Meeting (discuss consolidated PA answers and find common grounds / areas of disagreement)	Monday, April 21, 2025
1st Draft report posted by PG&E	Monday, May 5, 2025
3rd WG Meeting (discuss draft report concerns)	Monday, May 19, 2025
2nd Draft report posted by PG&E	Wednesday, June 4, 2025
Discuss 2nd draft with broader reporting PCG	Thursday, June 5, 2025
4th WG Meeting (discuss PCG feedback, attempt to finalize report)	Monday, June 16, 2025
Final Draft Posted	Tuesday, July 15, 2025
Filing	Monday, September 1, 2025

Question 1:	What are the most feasible options to accurately assess energy efficiency program participation by different demographic groups? Are there more efficient or less costly methods (i.e., using geographic, census, survey, or other data) of regularly assessing demographic participation in energy efficiency programs compared to collecting information from each program participant?
PA	Response
3C-REN	3C-REN agrees that customer demographic data should be voluntary and not a requirement for program participation. 3C-REN recommends using geographic and census-based analysis to not add the addition of survey burden to PAs. This geospatial data for each customer could be added in the comments section of CEDARS claim reporting or preferably as a separate field. The limitation of this approach is that customer-level data would not be available. It is also important to note that certain program types like NMEC roll up claims and report them in aggregate to CEDARS. Addresses would need to be geocoded before savings are aggregated.
Ava	
BayREN	The least costly option would be to assess demographic participation at the census tract level. PAs already report addresses as part of the PII submission, and those addresses could be matched to census tracts and the demographics of census tracts analyzed in a systematic way. Because PAs already provide these data, assessment could be done most efficiently post-submission by a CPUC GIS consultant or similar position with no additional cost to PAs. Other data already reported that could be helpful in this assessment would be equity participation overlaid with the census tract demographics. For example, if a census tract has 20% non-English speaking households and residential programs are reporting 5% non-English speaking participation, additional outreach may be worth considering.
CCRREN	CCR REN agrees with PGE's recommendations while noting that with the reporting of site/customer address, Census Tract reporting through CEDARS is not needed. Site/Participant addresses can be layered on-top of census tract polygons in most mapping software solutions thus reducing additional costs to PAs and to their consultants and 3rd party implementers. Lastly, CCR REN agrees that without having both participant and non-participant data, the exercise may not be very useful in determining group differences. To overcome this potential challenge, CCR REN recommends considering adding demographic data collection to EM&V study workplans and in those plans, the EM&V consultants should also consider collecting representative samples of both participant and non-participant groups through robust survey methodology using the Dillman Tailored Design Method. EM&V should use models that are academically robust while being empowered to reject any inference should the samples be insufficient to make any statement regarding group difference.
IREN	Indirect data collection may be the most effective as it is considered less invasive. More personal data may be expected less frequently.
MCE	MCE agrees that using geographic and publicly available data is a cost-effective and scalable way to assess demographic participation in energy efficiency programs. This method does not require any new or invasive data requests from customers. Participation in programs should not be conditioned on providing demographic information, and any analysis is done using existing utility account data.
NREN	The most feasible options to assess energy efficiency program participation by different demographic groups is by gathering demographic data for those using NREN's resources. This can be as registration questions for training and workshops, post participation surveys, or data collection on NREN's website. Since demographics questions are often optional and survey response rates are usually low in our region, this may not lead to accurate data. A Market Assessment Survey would also allow demographic data to be collected.
PG&E	The less costly and recommend method is to use publicly and other readily available data to generalize the participating demographics of individual programs. One way to do this would be for portfolio administrators to provide the census tract for each project as part of the Site information provided in CEDARS claims. This census tract could be used in evaluation for matching up demographic averages from the census data. The advantages of this are: low cost, no personally identifying information required, and readily available data that can help determine if EE programs are appropriately serving tracts that have more underserved groups. The disadvantage is individual customers demographics will not be known, and there will be no data to support if the EE program is supporting demographics within a tract similarly to how they are normally distributed. On top of census demographic data, PG&E can also provide other information like CARE or FERA status, ESA status, Medical Baseline Status, Tribal designations, NAICS codes of businesses, and dwelling types. In the event that individual data collection is asked for - PG&E's position is we can only request information from the customer but that they can opt out of providing it and it will not be a pre-requisite to participating in our programs. Depending on the amount of customers that opt out, and if they tend to opt out more in certain demographics, this could make the data not very useful.
SCE	No public demographic data would be able to accurately assess the actual breakdown of participants. The only way would be to require data collection or do sampling in evaluation studies based on the public census data
SCG	While SCG agrees with the method provided by PG&E, it is beneficial to use the "Targeting" method that uses all the data available including the Census data and CEDARS to find the best applicant for each program.
SDG&E	SDG&E concurs with PG&E's response. Additionally, SDG&E wants to clarify that additional data provided would be specific to local/regional program participants.
SDREN	Publicly and other readily available data is the most feasible option. Collecting data directly from customers may be less feasible; however, it is valuable data to obtain - particularly if sufficient data can be collected to generate a statistically significant sample size. If/when doing so, PAs should try to follow the principles of data equity (e.g., allow for cultural modifications to standard data collection tools, analysis, and sharing, facilitate data sovereignty by paving the way for communities to govern the collection, ownership, dissemination and application of their own data). The Distributional Equity Analysis for Energy Efficiency and Other Distributed Energy Resources lists some of these principles on page 54. While this prompt does not speak to distributional equity analyses specifically, it's good practice and may facilitate data collection in such a way that yields higher response rates. Additionally, it could help facilitate distributional equity analyses PAs and/or the CPUC may want to explore in the future, as recently discussed in the April 20th CPUC workshop titled DER Cost-Effectiveness Workshop: Guiding Principles, Addressing Equity Concerns and Changes to the Biennial Update Process for the ACC.
SoCalREN	Returning to the suggestion of publicly available data, examples of national public data sources that can be accessed at no-cost include: - U.S. Bureau of the Census and Bureau of Labor Statistics - Current Population Survey, County Business Patterns, Statistical Abstracts Series (Annual government publication that contains social and economic statistics for the U.S. and selected international data. Data are retrievable from numerous tables which are divided into subjects such as population, vital statistics, education, energy and agriculture.) - Social Security Administration - U.S. Citizenship and Immigration Services - The White House Briefing Room (Good source for locating popular economic and demographic information available from various government agencies.) - National Center for Health Statistics - Vital Statistics of the United States (Contains data on health reports that can be used to inform other challenges facing target populations and addressed by energy improvements)
PCE	Optional customer surveys conducted after program participation is another way to gather information directly from the individuals or families who received services. SoCalREN concurs with PG&E that the more cost-effective approach is to assess demographics based on claim site data. We recommend that ED utilize the addresses already submitted in the claims PII to assign projects to appropriate census tracts and assess demographics based on those tracts. While a participant survey may be a feasible option, we are concerned that requesting additional information from participants could create an additional barrier to participation, particularly among residential and WE&T participants. Furthermore, if responses are voluntary and not required for participation, there is a risk that the data may not be representative of the broader populations being served. Most cost effective and feasible option is geographic data based on addresses, and income based on the participation low-income program such as CARE, FERA or Medical Baseline. Mapping customer addresses can better determine which census tract they are in, and is more accurate. Mapping is affordable and simple to do. Other options such as accessing census & income data are far less feasible as this data isn't readily accessible to us. Using census data on its own or in combination with participation of at least one low-income program is one of the more accessible ways for us to determine if a customer is vulnerable or low-income.

Question 2: What, if any, demographic data is already being collected (and for which programs)?

PA	Program Name	Region	Language	Ethnicity/Race	Disability	Tribal	Income	Additional Notes on Demographic Data Collected	Data Anonymized	Comments
PG&E	SW Residential New Construction - California Energy Smart Homes Program (CESHP) SW_NC_Res_electric	☒	☐	☐	☐	☐	☐	Business Name, First Name, Last Name, Address, Phone, Email	No	
PG&E	SW Non-Residential New Construction - California Energy Design Assistance (CEDA) SW_NC_NonRes	☒	☐	☐	☐	☐	☐	First Name, Last Name, Customer ID, Email, Phone, Project Address, Utility Provider, Building Type	No	
PG&E	Compliance Improvement PGE21053	☒	☐	☐	☐	☐	☐	1. We collect addresses for Energy Code Ace training participants. 2. We collect zip codes when someone uses the Energy Code Ace Virtual Compliance Assistant (VCA) to complete nonresidential compliance forms.	No	
PG&E	HomeIntel PGE_Res_001b	☒	☒	☐	☐	☐	☐	Region: via address collection. Language: customers can select Spanish language option in the process.	No	
PG&E	Electrification Pilots (Empower My Home, Powerful Neighborhoods, Electrify My Block) PGE_Res_004a, PGE_Res_004b, PGE_Res_005	☒	☒	☐	☐	☐	☒	Region: Via the address. Income: Customers will self-attest yes or no as to whether they meet the income requirements of below 400% of FPG. Language: Customers will self-attest yes or no as to whether they speak English or not.	No	
PG&E	WE&T IET Trainings SW_WET_Work, SW_WET_CC	☒	☒	☐	☐	☐	☐	Address, City, Company, First Name, Full Name, Home Zip Code, Language, Last Name, Mobile, Occupation, Zip Code	No	We don't anonymize the data because we need the usernames for the DAC workers analysis.
PG&E	All Other Downstream Programs	☒	☐	☐	☐	☐	☐	Collect customer ID.	Yes	
SCE	All Programs reported at a customer level	☒	☐	☐	☐	☒	☒	SCE's customer data does include the information. Income would only be collected if they are trying to qualify for an Equity or Income-Qualified program	No	
NREN	Residential Resource Acquisition	☒	☒	☐	☐	☐	☐	Residential Resource Acquisition Metric: percent of services rendered to hard-to-reach, disadvantaged, disinvested, and underserved customer. -Track geographic location, household income, primary language, and housing type.		NREN is not yet gathering demographic data, however once its programs launch, each program will be gathering demographic data. To track participants in DAC or underserved communities, NREN will gather the geographic location of the participants and
NREN	Commercial Resource Acquisition	☒	☒	☐	☐	☐	☐	Commercial Resource Acquisition Metric: Services to HTR, disadvantaged, and underserved customers exceed 70% of all rendered services. -Track geographic location, primary language, business size, and leased or rented facilities.		NREN is not yet gathering demographic data, however once its programs launch, each program will be gathering demographic data. To track participants in DAC or underserved communities, NREN will gather the geographic location of the participants and
NREN	Codes & Standards	☒	☐	☐	☐	☐	☐	Codes & Standards: targets and serves disadvantaged and underserved communities. -Track geographic location		NREN is not yet gathering demographic data, however once its programs launch, each program will be gathering demographic data. To track participants in DAC or underserved communities, NREN will gather the geographic location of the participants and
NREN	Public Equity	☒	☐	☐	☐	☐	☐	Public Equity: targets and serves disadvantaged and underserved communities. -Track geographic location		NREN is not yet gathering demographic data, however once its programs launch, each program will be gathering demographic data. To track participants in DAC or underserved communities, NREN will gather the geographic location of the participants and
NREN	Workforce Education & Training	☒	☒	☐	☐	☐	☒	Workforce Education & Training: designed to reach disadvantaged workers, located in HTR, low-income, and tribal communities. -Track geographic location, household income, primary language, and housing type.		NREN is not yet gathering demographic data, however once its programs launch, each program will be gathering demographic data. To track participants in DAC or underserved communities, NREN will gather the geographic location of the participants and
NREN	Finance Program	☒	☒	☐	☐	☒	☒	Finance Program: designed to reach disadvantaged workers, located in HTR, low-income, and tribal communities. -Track geographic location, household income, primary language, and housing type.		NREN is not yet gathering demographic data, however once its programs launch, each program will be gathering demographic data. To track participants in DAC or underserved communities, NREN will gather the geographic location of the participants and
NREN	Residential Equity	☒	☐	☐	☐	☐	☐	Residential Equity: create additional opportunities for disadvantaged workers. -Track geographic location		NREN is not yet gathering demographic data, however once its programs launch, each program will be gathering demographic data. To track participants in DAC or underserved communities, NREN will gather the geographic location of the participants and
SDREN	N/A (SDREN does not currently have any programs)	☐	☐	☐	☐	☐	☐	N/A	N/A	N/A
SDG&E	4184- Non-Residential Behavioral Program Business Energy Reprots (BER)	☐	☐	☐	☐	☐	☐			

Question 2: What, if any, demographic data is already being collected (and for which programs)?

PA	Program Name	Region	Language	Ethnicity/Race	Disability	Tribal	Income	Additional Notes on Demographic Data Collected	Data Anonymized	Comments
SDG&E	4040- Home Energy Audits and Reports (HEAR)	☐	☐	☐	☐	☐	☐			
SDG&E	4178 - COM SW-HVAC Program	☐	☐	☐	☐	☐	☐	This midstream program only collects end-user: Address, Business Name, First Name, Last Name, Email address and Phone number. The Language, Ethnicity/Race, Disability, Tribal and Income are NOT collected from End-User or participating Distributors.	No	There are no responses and the matrix checkboxes are left BLANK, please reference the Additional Notes column.
SDG&E	4179 - RES SW-HVAC Program	☐	☐	☐	☐	☐	☐	This midstream program only collects end-user: Address, First Name, Last Name, Email address and Phone number. The Language, Ethnicity/Race, Disability, Tribal and Income are NOT collected from End-User or participating Distributors.	No	There are no responses and the matrix checkboxes are left BLANK, please reference the Additional Notes column.
SDG&E	4168 - GRID – Lodging Program	☐	☒	☐	☐	☐	☐	This commercial program has not yet been setup in EECF although the responses are based on projected data that will be captured in support of identifying customer as HTR and part of DAC communities. Additionally, the GRID-Lodging would not pursue projects on TRIBAL lands as those are FEDERAL customers and do not qualify for the GRID-Lodging program.		
SDG&E	4174 - Workforce Education & Training Program	☐	☐	☐	☐	☐	☐	First Name, Last Name, Customer ID, Email, Phone, Zip Code, Career Choice, Disadvantaged Worker Attestation (yes/no)	No	All classes are in English, some classes are in Spanish, but no question is asked of preferred language.
SDG&E	4136 - Statewide Residential HVAC QIQM	☐	☐	☐	☐	☐	☐			
SDG&E	3226 - Business Energy Solutions	☐	☒	☐	☐	☐	☐	Tribal customers are not eligible for this program.		
SDG&E	4169 - Groceries, Restaurants, and Food Storage	☐	☒	☐	☐	☐	☐	Tribal customers are not eligible for this program.		
SDG&E	4170 - SD Energy Edge (Retail, Office, Wholesale Program)	☐	☒	☐	☐	☐	☐	Tribal customers are not eligible for this program.		
SDG&E	4176- Residential Equity Education & Outreach	☒	☐	☐	☐	☐	☐	Region via the address collection.		
SDG&E	4173- Small Business Outreach	☐	☒	☐	☐	☒	☐			
SDG&E	4166 - Statewide Plug-Load and Appliance Program (SW-PLA)	☐	☐	☐	☐	☐	☐	This midstream program only collects end-user: Address, First Name, Last Name, Email address and Phone number. The Language, Ethnicity/Race, Disability, Tribal and Income are NOT collected from End-User or participating Distributors.	No	There are no responses and the matrix checkboxes are left BLANK, please reference the Additional Notes column.
SDG&E	4001 - Residential Energy Solutions (RES)	☐	☒	☐	☐	☐	☒	Customer attests if english is a second language and their care/fera status. Tribal customers are not eligible for this program.	No	
SDG&E	4002 - Residential Zero Net Energy Transformation (RZNET)	☐	☒	☐	☐	☐	☒	Customer attests if english is a second language and their care/fera status. Tribal customers are not eligible for this program.	No	
SDG&E	4012 - SD EnergyLink	☐	☒	☐	☐	☒	☒	The federal program serves all federal and tribal customers, both residential and non-residential. Therefore, customer attests if english is a second language, their care/fera status, and indicate Native Tribe if applicable.	No	
SDG&E	4197 - Market Access Program - Residential	☐	☐	☐	☐	☐	☐	Language, Ethnicity/Race, Disability, Tribal and Income are not currently collected.	No	For 2025 program year, the program plans to collect data to indicate HTR status
SDG&E	4198 - Market Access Program - Commercial	☐	☐	☐	☐	☐	☐	Language, Ethnicity/Race, Disability, Tribal and Income are not currently collected	No	For 2025 program year, the program plans to collect data to indicate HTR status

Question 2: What, if any, demographic data is already being collected (and for which programs)?

PA	Program Name	Region	Language	Ethnicity/Race	Disability	Tribal	Income	Additional Notes on Demographic Data Collected	Data Anonymized	Comments
SDG&E	4168 - GRID -PIH	☐	☒	☐	☐	☐	☐	This commercial program has not yet been setup in EECIP although the responses are based on projected data that will be captured in support of identifying customer as HTR and part of DAC communities. Additionally, the GRID-Lodging would not pursue projects on TRIBAL lands as those are FEDERAL customers and do not qualify for the GRID-Lodging program.		
SoCalREN	Public Agency Revolving Loan Fund	☒	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Energy Efficiency Project Delivery Program	☒	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Distributed Energy Resource Disadvantaged Communities Program	☒	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Public Agency NMEC Program	☒	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Streamlined Savings Program	☒	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Energy Resiliency Action Plan	☒	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Rural-Hard to Reach Direct Install	☒	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses, install energy efficiency measures, and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Water Infrastructure Program	☒	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Water/Wastewater Strategic Energy Management	☒	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Underserved Schools Strategic Energy Management	☒	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Multifamily Program	☒	☒	☐	☐	☒	☒	We collect income information on properties through CalEnviroScreen but also request property's deed restrictions, or rent rolls or other documentation to show low income status.	Yes	
SoCalREN	Residential Kits4Kids	☒	☐	☐	☐	☐	☐	Language information is collected on our intake form, which is our property audit document for the We do not collect personal identifiable information from the students. We collect data on schools and their demographics. We provide materials and post cards in Spanish.	yes	
SoCalREN	ACES Pathway	☒	☒	☒	☒	☐	☒	- In addition to the provided fields, ACES is currently tracking gender as part of its demographic data collection. - ACES does not collect individual student family income data. Instead, economic status is determined using the school's Title I designation (indicating that at least 80% of students qualify for	Demographic data for the ACES program is tracked	Physical disability (FGLS and fieldtrips) Learning disability (Program Application)
SoCalREN	Green Path Careers	☒	☒	☒	☐	☐	☐	In addition to the provided fields, GPC is currently tracking gender as part of its demographic data collection.		
SoCalREN	WE&T Opportunity HUB	☐	☐	☐	☐	☐	☐			Program not officially launched as of April 2025
SoCalREN	Agriculture WE&T	☐	☐	☐	☐	☐	☐			Program not officially launched as of April 2025

Question 2: What, if any, demographic data is already being collected (and for which programs)?

PA	Program Name	Region	Language	Ethnicity/Race	Disability	Tribal	Income	Additional Notes on Demographic Data Collected	Data Anonymized	Comments
SoCalREN	E-Contractor Academy	☒	☒	☒	☐	☐	☐	- In addition to the provided fields, ECA is currently tracking gender as part of its demographic data collection. - ECA collect business income (revenues) for contractors through the program enrollment application and gather additional details during the assessment process.		
BAY	Single Family	☒	☒	☐	☐	☐	☒		No, we record this info per participant.	We will be collecting preferred language and what income bands participants fall into (\$20k bands up to ~\$220k/year) but not specific household income values. Each project will have an associated address, so I assume yes for region.
BAY	Multi Family	☒	☐	☐	☐	☐	☐	Region is always Bay Area, we track all projects' physical addresses and the mailing addresses of those receiving the rebate check. Income is not directly tracked at the project level but is tracked on average at the census level in which the project is located as it informs eligibility for our housing burden multiplier. Relatedly, in a post-install tenant/renter survey we selectively administer, we ask "Region"	No, we record this info per participant (re "Region")	
BAY	Codes and Standards Program	☒	☐	☐	☐	☐	☐	We track the geographic locations of Codes & Standards participants, together with basic identifying data (names and email addresses).	We record the data per participant & report by	The Codes & Standards program's target audience is local governments, and therefore we do not collect demographic data other than location, focusing on which jurisdictions are participating in the program.
BAY	Water Upgrades Save	☒	☐	☐	☐	☐	☐	Participant addresses are captured.	No	
BAY	Commercial	☒	☒	☐	☐	☒	☐	Region is always Bay Area. As part of hard-to-reach eligibility, we track whether English is the primary language or not, but not the specific language. As part of hard-to-reach/underserved eligibility, we collect whether a business is located on CA Native American Tribes' territory. We collect whether the business is owned/operated by a CA Native American Tribe or Tribe Member	No, we record this info per participant.	
BAY	Green Labeling	☒	☐	☒	☐	☐	☐	We also collect age and gender identify. All demographic responses are optional.	No, collected at registration	Data collected for real estate training registrations, no demographic data collected for Home Energy Score.
BAY	Climate Careers	☒	☒	☒	☒	☐	☒	We gather all demographic data mentioned except for tribal information. This is true for Green House Call clients and youth participants. For youth recruitment, we do not ask disability status before hiring. During our pre-program survey (once youth are hired), we ask youth participants to disclose disability so that we can support them during the program, if support is needed. All	No	
BAY	Refrigerant Replacement	☒	☒	☐	☐	☒	☐	Region is always Bay Area. As part of hard-to-reach eligibility, we track whether English is the primary language or not, but not the specific language. As part of hard-to-reach/underserved eligibility, we collect whether a business is located on CA Native American Tribes' territory. We collect whether the business is owned/operated by a CA Native American Tribe or Tribe Member	No, we record this info per participant.	
BAY	Integrated Energy Services	☒	☐	☐	☐	☐	☐	Region is just the Bay Area. Data collected includes jurisdictions that participate in IES program along with staff names and contact info.	No	
BAY	Targeted Decarbonization Services	☒	☐	☐	☐	☐	☐	Region is just the Bay Area. Data collected includes jurisdictions that participate in TDS program along with staff names and basic contact information.	No	
PCE	DAC-GT	☒	☐	☐	☐	☐	☐	Address, City, First and Last Name, Zip Code, Census Tract, Rate Code		
PCE	FLEXMarket	☒	☐	☐	☐	☐	☐	Region: via the address	No	
SCG	SCG3702 Residential Energy Efficiency Program (Resource)	☒	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3958 Residential Energy Efficiency Program (Equity)	☒	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3935 Residential Advanced Clean Energy Program (Equity)	☒	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3883 Residential Advanced Clean Energy Program (Resource)	☒	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		

Question 2: What, if any, demographic data is already being collected (and for which programs)?

PA	Program Name	Region	Language	Ethnicity/Race	Disability	Tribal	Income	Additional Notes on Demographic Data Collected	Data Anonymized	Comments
SCG	SCG3861 Community Language Efficiency Outreach Program	☒	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3884 Comprehensive Manufactured Homes Program	☒	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3885 Manufactured Home Program	☒	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3705 Multifamily Whole Building Program (Equity)	☒	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3938 Multifamily Whole Building Program (Resource)	☒	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3889 Multifamily Energy Alliance Program (Resource)	☒	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG Multifamily Energy Alliance Program	☒	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3829 SoCalGas Marketplace	☒	☐	☐	☐	☐	☒	Income collected for select customers using California Go Green Financing. This was about 300 transactions for 2024. Region (zip code) data collected for all customers making a purchase.	No	
SCG	SCG3890 Agriculture Energy Efficiency	☒	☒	☐	☐	☒	☐	Programs collect customer ID information, i.e. business name, account number, phone number, address, email, gas bill, installation site point of contact (Name, phone number, Email, Title)	No	if applicable, tribal information is collected as a way to qualify a customer for HTR/DAC. Language data collected is % of non english speaking workers on site and not tied directly to account holder (HTR/DAC qualifier)
SCG	SCG3882 Small Medium Business Program	☒	☒	☐	☐	☐	☐	Business name, account number, phone number, address, email, gas bill, installation site point of contact (Name, phone number, Email, Title)	No	
SCG	SCG3937 Small Medium Business Program - Equity	☒	☒	☐	☐	☐	☐	Business name, account number, phone number, address, email, gas bill, installation site point of contact (Name, phone number, Email, Title)	No	
SCG	SCG3887 Commercial Building Energy Solutions And Technologies (C-BEST) Program	☒	☒	☐	☐	☐	☐	Business name, account number, phone number, address, email, gas bill, installation site point of contact (Name, phone number, Email, Title)	No	
SCG	SCG3940 Commercial Building Energy Solutions And Technologies (C-BEST) Program - Equity	☒	☒	☐	☐	☐	☐	Business name, account number, phone number, address, email, gas bill, installation site point of contact (Name, phone number, Email, Title)	No	
SCG	SCG3886 Public Direct Install Program	☐	☐	☐	☐	☐	☐	Business Name, First Name, Last Name, Address, Phone, Email	No	
SCG	SCG3899 Large Public Sector Program	☒	☐	☐	☐	☒	☐	Business Name, First Name, Last Name, Address, Phone, Email,DAC/HTR	Yes	EIP Collects data by direct outreach through email, phone call, face to face meeting to identify qualified customers and facilitates for the LPS Program, EIP Follows all SoCalGas Customer data policy and handling, and we do not share or sell our customer
SCG	SCG3956 K-12 Public Schools Program	☐	☐	☐	☐	☐	☐	Business Name, First Name, Last Name, Address, Phone, Email	No	
SCG	SCG3942 Industrial STAR	☒	☒	☐	☐	☐	☐	Business name, account number, phone number, address, email, gas bill, installation site point of contact (Name, phone number, Email, Title)	No	Data is only collected if the business may potentially qualify as HTR.

Question 2: What, if any, demographic data is already being collected (and for which programs)?

PA	Program Name	Region	Language	Ethnicity/Race	Disability	Tribal	Income	Additional Notes on Demographic Data Collected	Data Anonymized	Comments
SCG	SCG3944 RGEPP	☒	☐	☐	☐	☐	☐	Business name, account number, phone number, address, email, gas bill, installation site point of contact (Name, phone number, Email, Title)	No	
SCG	SCG3909 Business Energy Efficiency Surveys	☒	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address, email, gas bill		
SCG	SCG3911 Non Residential Incentive Deemed (EERB)	☒	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address, email, gas bill		
MCE01	Multifamily Energy Savings	☒	☒	☐	☐	☐	☒		No	
MCE01c	Multifamily Strategic Energy Management	☒	☐	☐	☐	☐	☐		No	
MCE01d	Residential Efficiency Market	☒	☐	☐	☐	☐	☐		No	
MCE02a	Commercial Deemed	☒	☐	☐	☐	☐	☐		No	
MCE02b	Commercial Custom	☒	☐	☐	☐	☐	☐		No	
MCE02c	Commercial Strategic Energy Management	☒	☐	☐	☐	☐	☐		No	
MCE02d	Commercial Efficiency Market	☒	☐	☐	☐	☐	☐		No	
MCE02e	Small Business Energy Advantage	☒	☐	☐	☐	☐	☐		No	
MCE08	Single Family Home Energy Savings	☒	☒	☐	☐	☐	☒		No	
MCE10a	Industrial Deemed	☒	☐	☐	☐	☐	☐		No	
MCE10b	Industrial Custom	☒	☐	☐	☐	☐	☐		No	
MCE10c	Industrial Strategic Energy Management	☒	☐	☐	☐	☐	☐		No	
MCE11a	Agricultural Deemed	☒	☐	☐	☐	☐	☐		No	
MCE11b	Agricultural Custom	☒	☐	☐	☐	☐	☐		No	

Question 2: What, if any, demographic data is already being collected (and for which programs)?

PA	Program Name	Region	Language	Ethnicity/Race	Disability	Tribal	Income	Additional Notes on Demographic Data Collected	Data Anonymized	Comments
MCE11c	Agricultural Strategic Energy Management	☒	☐	☐	☐	☐	☐		No	
MCE16	Green Workforce Pathways	☒	☐	☐	☐	☐	☒		No	
I-REN	CS-001	☒	☒	☐	☐	☐	☒	Also collect homeowner/renter status		
I-REN	WET-001	☒	☐	☐	☐	☐	☐			
3C-REN	TCR-Ag-001: Agriculture Technical Assistance	☒	☒	☒	☐	☒	☐	Address, City, County, Zip Code, Full Name, Phone Number, Company, Language, Utility Provider, Utility Rate Class, Leased/Rented or Owned Facility, Number of Employees	No	
3C-REN	TCR-CC-001: Energy Assurance Services (EAS)	☒	☐	☐	☐	☐	☐	Address, City, County, Zip Code, Full Name, Phone Number	No	
3C-REN	TCR-Com-001: Commercial Marketplace	☒	☒	☒	☐	☒	☐	Address, City, County, Zip Code, Full Name, Phone Number, Company, Language, Utility Provider, Utility Rate Class, Leased/Rented or Owned Facility, Number of Employees	No	
3C-REN	TCR-CS-001: Codes & Standards	☒	☐	☐	☐	☐	☐	Home Address, Zip Code, Full Name, Phone Number, Email, Organization, Profession	No	
3C-REN	TCR-Res-002: Multifamily	☒	☒	☐	☐	☒	☐	Address, City, County, Zip Code, Full Name, Phone Number, Language, CARE/FERA eligibility, Utility Provider, Deed Restricted	No	
3C-REN	TCR-Res-003: Single Family NMEC	☒	☒	☐	☐	☒	☐	Address, City, County, Zip Code, Full Name, Phone Number, Email, CARE/FERA eligibility, Utility Provider, Language, Tenant Ownership	No	
3C-REN	TCR-WET-001: Workforce Education & Training	☒	☒	☐	☐	☒	☐	Home Address, City, County, Zip Code, Full Name, Phone Number, Email, Employer, Job Title	No	
CCR REN	Residential Equity Program (CCR-RES-001)	☒	☐	☐	☐	☐	☐	The minimum necessary demographic data will be collected to verify program participation eligibility. Seeking additional information during the customer acquisition phase may introduce unintended consequences to program participation with rural, disadvantaged and underserved communities and reduce equitable access. See CCR REN's answer to question 1 for our	No	
CCR REN	Commercial Energy Improvement Program (CCR-COM-001)	☒	☐	☐	☐	☐	☐	The minimum necessary demographic data will be collected to verify program participation eligibility. Seeking additional information during the customer acquisition phase may introduce unintended consequences to program participation with rural, disadvantaged and underserved communities and reduce equitable access. See CCR REN's answer to question 1 for our	No	
CCR REN	Rural California Pathway for Climate Adaptive Careers (CCR-WET-001)	☒	☐	☐	☐	☐	☐	The minimum necessary demographic data will be collected to verify program participation eligibility. Seeking additional information during the customer acquisition phase may introduce unintended consequences to program participation with rural, disadvantaged and underserved communities and reduce equitable access. See CCR REN's answer to question 1 for our	No	
CCR REN	Codes and Standards Program (CCR-CS-001)	☒	☐	☐	☐	☐	☐	The minimum necessary demographic data will be collected to verify program participation eligibility. Seeking additional information during the customer acquisition phase may introduce unintended consequences to program participation with rural, disadvantaged and underserved communities and reduce equitable access. See CCR REN's answer to question 1 for our	No	
CCR REN	Public Equity Program (CCR-PUB-001)	☒	☐	☐	☐	☐	☐	Collecting demographic data on public agencies should be done at the community level opposed to the staff member level. See our answer to the additional questions.	No	
CCR REN	Finance Program (CCR-FIN-001)	☒	☐	☐	☐	☐	☐	The minimum necessary demographic data will be collected to verify program participation eligibility. Seeking additional information during the customer acquisition phase may introduce unintended consequences to program participation with rural, disadvantaged and underserved communities and reduce equitable access. See CCR REN's answer to question 1 for our	No	

Question 3:	What types of demographic data could be collected for energy efficiency program participation?
PA	Response
3C-REN	3C-REN believes geospatial data should be collected to determine eligibility based on equity community criteria. While additional data—such as household or business characteristics (income, ownership), socioeconomic factors (primary language, gender), and workforce information (employment status, occupation)—could be collected, it should not be reported at the portfolio level to account for variations in data resolution and participants' willingness to respond to surveys.
Ava	
BayREN	While it may be feasible to request participants to complete a demographic survey, BayREN has concerns about introducing an additional barrier to participation and the accuracy of voluntary survey responses after implementation. We have found that census data is a useful tool for characterizing the reach of our programs. It provides extensive insights into where projects are being implemented and helps identify which communities are benefiting most from the programs.
CCRREN	CCR REN agrees that using census block group data to link community demographics to participation is the appropriate next step. Demographic data beyond what is currently required for participation in varying programs should be collected during EM&V and be defined and agreed upon in the approved EM&V workplan. Demographic data should not be consistent across primary sectors.
IREN	Homeowner/renter status, household size, household income, language
	CARE / FERA
	Medical Baseline and Life Support flags
	Essential Customer flag
	Zip code and census tract
	Rate code, NEM participation
MCE	Energy consumption data
NREN	NREN's Residential and Commercial Resource Acquisition programs will track geographic location, household income, primary language, housing type, business size, and leased or rented facilities. The Codes & Standards program will also track geographic location of participants.
	PG&E is collecting customer IDs for participating customers that can be linked to geographical and other customer information such as rate code, CARE/FERA/ESA participation, NEM participation, census block group, preferred billing language, dwelling types, service types, and annual usage amounts. The census block group data point can be used to further link to disadvantaged community status, overall census data, average community incomes, and average age and race demographics within a given community. While additional information could be collected in surveys at the participant level for selected programs, PG&E believes these must be voluntary surveys to not provide any additional barriers to customer's participating. The ability to opt-out of these surveys may impact any ability to accurately provide information that doesn't present any biases.
PG&E	
SCE	Any data could be requested, the ability to verify and trust the data collected is more difficult and could lead to reduced participation.
SCG	Agree with PG&E
SDG&E	SDG&E agrees with PG&E's response but would like to clarify that the additional data collection would only occur for local/regional program participants only and not necessarily for Statewide participants. Statewide participant data is managed by the SW PA administrator. The non-lead PAs only receive their designated allocation of costs and benefits.
	In addition to the data summarized in PG&E's response, below are sector/program-level examples of demographic data that could be collected from public sources or from the customer. 1. Residential: Address/sub address data: located in AB 1550 community (Y/N), located in a region with high-respiratory disease (Y/N), year built, age, race/ethnicity, income (range), rent/own, employed (Y/N), # of people in household, primary language spoken at home. 2. Commercial: Address/sub address data: located in AB 1550 community (Y/N), located in a region with high-respiratory disease (Y/N), square footage, year built, owner's race/ethnicity, income (range), rent/own business space, # of employees, if the business sponsors U.S. visas, primary language spoken by owner, primary language(s) spoken by employees (if applicable). 3. Public: For public agency facilities: Address/sub address data: located in AB 1550 community (Y/N), located in a region with high-respiratory disease (Y/N), square footage, OSFM fire severity zone, if facility is open to the public: how many community members are served, demographics and DAC status of the municipality can be considered. For schools: Title 1 status, % of students eligible for Free or Reduced-Price Meal (Student Poverty) Data. 4. WE&T: located in AB 1550 community (Y/N), level of education and longer term outcomes collected in voluntary surveys such as percentage of participants entering the energy/STEM sector after participating, and employment status.
SDREN	
SoCalREN	As mentioned in our response to Q1, while it may be feasible to request participants to complete a demographic survey, SoCalREN has concerns about introducing an additional barrier to participation. We have found that census data is an invaluable tool in characterizing the reach of our programs. It provides extensive insights into where projects are being implemented and helps identify which communities are benefiting most from the programs.
	Agrees with PG&E: "PG&E is collecting customer IDs for participating customers that can be linked to geographical and other customer information such as rate code, CARE/FERA/ESA participation, NEM participation, census block group, preferred billing language, dwelling types, service types, and annual usage amounts. The census block group data point can be used to further link to disadvantaged community status, overall census data, average community incomes, and average age and race demographics within a given community. While additional information could be collected in surveys at the participant level for selected programs, PG&E believes these must be voluntary surveys to not provide any additional barriers to customer's participating. The ability to opt-out of these surveys may impact any ability to accurately provide information that doesn't present any biases."
PCE	NOTE: that there is uncertainty regarding whether or not certain federal data (such as census) will be available, reliable or protected under the current federal administration, and so there is a risk in relying on its availability.

Question 4:	For which segments, sectors, and programs should this data be collected?
PA	Response
3C-REN	3C-REN believes demographic data is most applicable to Residential, Public, Commercial, and Workforce Education & Training (WET) programs. In general, equity-focused programs should track demographic data to ensure they are being delivered equitably. Additionally, WET programs should collect demographic data to monitor participation among disadvantaged workers and assess workforce development impacts.
Ava	
BayREN	BayREN agrees with PG&E that demographics would lend the most insight to Residential, Public, and Commercial programs. For Residential and small commercial, demographics for individual participants may be helpful but tract-level collection would be indicative of participation trends. For public, individual participant data would likely not be very useful but tract-level demographics would show the demographic makeup of locations where projects are being done.
CCRREN	CCR REN believes that demographic data can be collected across residential, public and commercial programs. However, CCR REN offers caution in approach for commercial and public as demographics of those entities must be tailored to their organizational structure to mitigate data on the individual. In addition, CCR REN believes that this information should be collected during EM&V and that the collection of this data should begin within the residential sector and be phase out to commercial and public.
IREN	Equity and market support segments, sectors that are more focused on individual participants like residential and commercial
MCE	MCE agrees with PG&E that demographic analysis is most impactful in the residential, public, and small commercial sectors, particularly for programs that directly recruit participants. We also emphasize the importance of identifying and analyzing residential and commercial subsegments.
NREN	This data will be collected for all of NREN's programs and sectors (Residential, Public, Commercial, and C&S).
PG&E	PG&E believes demographic data is most applicable to analyze in Residential, Public, and Commercial programs. Programs that directly recruit participants would be relevant to track demographics to understand if the portfolios are serving our communities equitably. While analyzing demographics for programs that randomly select treatment and control groups, such as PG&E's Continuous Energy Feedback Program (otherwise known as Home Energy Reports), would likely provide little insight at the program level, including them in portfolio level calculations will help understand the holistic impacts on different sectors of customers.
SCE	Demographic data is most helpful in those sectors that are most prevalent in most areas such as Residential, Public and Commercial. Most Industrial and Agricultural areas are most likely more similar in demographic breakdowns.
SCG	Agreed with PG&E
SDG&E	SDG&E concurs with PG&E's response.
SDREN	Residential, Commercial, Public, Codes and Standards and Workforce, Education and Training (WE&T) programs
SoCalREN	SoCalREN agrees that demographic data is most applicable for residential, public, commercial, agricultural, and WE&T programs. While student data may not be collected, using census tract data will provide valuable insights into where program impacts are occurring and help ensure that we are reaching diverse communities effectively.
PCE	Agrees with PG&E: "PG&E believes demographic data is most applicable to analyze in Residential, Public, and Commercial programs. Programs that directly recruit participants would be relevant to track demographics to understand if the portfolios are serving our communities equitably. While analyzing demographics for programs that randomly select treatment and control groups, such as PG&E's Continuous Energy Feedback Program (otherwise known as Home Energy Reports), would likely provide little insight at the program level, including them in portfolio level calculations will help understand the holistic impacts on different sectors of customers."

Question 5:	Where should this data be reported and stored?
PA	Response
3C-REN	This data should be reported with the quarterly claims. The process should create as minimal changes as possible to the current reporting process.
Ava	
BayREN	BayREN agrees that data should be collected in claims and submitted with the existing PII submission if additional data is needed. Potentially only data currently collected (specifically address) would be required to join claims PII to demographic data at the tract level.
CCRREN	CCRREN recommends no change in the current submission process. While agreeing with PG&E regarding the use of census tracts, we believe that adding additional reporting data points must be done with great caution. In this case, site/participant address can easily be mapped on-top of a census tract polygon and the benefit of collecting and reporting census tract data in claims data does not outweigh the cost to the ratepayer where the same action can be taken at scale after the fact. Demographics collected during EM&V should be stored using current existing structures to link values to claims data.
IREN	Perhaps securely on CEDARS (only accessible for PAs and representatives of PAs)
MCE	Agree with PG&E and SCG.
NREN	This data should be reported using the claims process and stored in CEDARS.
PG&E	Required data points should be collected in claims. Where possible, minimal information like census block group should be collected that can later be tied to other demographic information by evaluators. Any automations that can be added to existing claims systems to facilitate this data joining would promote efficiency and consistent approaches statewide. Metrics should be collected in existing metrics processes.
SCE	If data is easily reported in a number, value list, or other simple response, then claims would be the logical place to collect them. Analysis should only be reported in the metrics reports.
SCG	Stored in EECF, and reported to CEDARS
SDG&E	All required data points should be collected in claims submissions and stored/reported in CEDARS. SDG&E agrees with PG&E regarding census block data to be utilized by evaluators. However, SDG&E believes new proposed Site Information data (like census tract, CARE or FERA status, ESA status, Medical Baseline Status, Tribal designations, NAICS codes of businesses, and dwelling types) could be utilized when revamping CEDARS visualizations via Power BI to include annual report like tables/metrics. This would increase ease of access to program performance/data, can be updated more frequently/refreshed after quarterly uploads, store historical data to compare trends and alleviate the need for most excel tables requested for the Annual Report and Metrics deliverables.
SDREN	SDREN is aligned with PG&E's response.
SoCalREN	As mentioned in our response to Q1, SoCalREN recommends that ED utilize the address data already submitted with claims PII to assess demographic participation in programs. The raw data can be processed in the same manner as it currently is, but the results would need to be shared to show results (either on a program, PA, or statewide basis).
PCE	Agrees with PG&E: "Required data points should be collected in claims. Where possible, minimal information like census block group should be collected that can later be tied to other demographic information by evaluators. Any automations that can be added to existing claims systems to facilitate this data joining would promote efficiency and consistent approaches statewide. Metrics should be collected in existing metrics processes.

Question 6:	What should be the timeline for PAs to begin reporting participation by demographic group?
PA	Response
3C-REN	PAs should have at least 6 months after the final ruling to implement tracking of demographic data before reporting.
Ava	
BayREN	If the CPUC adopts the recommendation to use existing PII for demographic assessment, an added benefit would be the ability to apply a consistent methodology across PAs and over time to claims from previous years, with no additional effort required from PAs.
CCRREN	If CCR REN recommendations are adopted where Site Address is used to map against census tract data in aggregate and additional demographics are collected during EM&V no additional demographic information is required and thus no timelines are applicable. Should the CPUC disagree with CCR REN recommendations, we agree with PG&E's recommended timeline.
IREN	In line with the development of equity and market support indicators and after data sharing protocols among PAs are more robust
MCE	Agree with PG&E
NREN	PAs should be given sufficient time to begin tracking the data and getting systems in place after clear guidance on the implementation is released. This should be at least 3 to 6 months. Reporting should then be required at minimum one quarter after tracking begins. Clear dates and timelines should be give to the PAs.
PG&E	PAs should report participation by demographic group only after the CPUC has issued clear and direct guidance one the data required and each PA has had 6 months to implement any newly required collection processes.
SCE	The timeline for PAs to begin reporting should coincide with the next available Application period and the requirements and guidance should be included in the Decision for that Application period to ensure consistency throughout the applicaton period.
SCG	Agree with the PG&E
SDG&E	SDG&E concurs with PG&Es response "PAs should report participation by demographic group only after the CPUC has issued clear and direct guidance on the data required and each PA has had 6 months to implement any newly required collection processes. "
SDREN	SDREN is aligned with PG&E's response.
SoCalREN	If the CPUC adopts SoCalREN's recommendation to use existing PII for demographic assessment, an added benefit would be the ability to apply a consistent methodology across PAs and over time to claims from previous years, with no additional effort required from PAs.
PCE	Agree with PG&E: "PAs should report participation by demographic group only after the CPUC has issued clear and direct guidance one the data required and each PA has had 6 months to implement any newly required collection processes. "

Question 7:	What should the frequency be for reporting demographic participation data?
PA	Response
3C-REN	Reporting should follow the annual report/quarterly claims schedule.
Ava	
BayREN	Annual reporting for metrics and quarterly reporting for claims related data should be sufficient.
CCRREN	If CCR REN recommendations are adopted where Site Address is used to map against census tract data in aggregate and additional demographics are collected during EM&V no additional demographic information is required and thus no timelines are applicable. Should the CPUC disagree with CCR REN recommendations, we agree with PG&E's recommended timeline.
IREN	We would suggest quarterly.
MCE	Agree with PG&E
NREN	Annually would be best in the Annual Report using the annual claim, but quarterly with Claims at most, or alongside EM&V reporting.
PG&E	Annual reporting for metrics and quarterly reporting for claims related data should be sufficient.
SCE	All overarching reporting should be no more frequent than quarterly but for this type of data, annual information is probably the most relevant.
SCG	Agree with PG&E
SDG&E	SDG&E concurs with PG&E's response as annual reporting for metrics and quarterly reporting for claims related data should be sufficient.
SDREN	SDREN is aligned with PG&E's response.
SoCalREN	SoCalREN envisions data collection and reporting to the CPUC on a quarterly basis, with summary reports provided annually.
PCE	Agree with PG&E: "Annual reporting for metrics and quarterly reporting for claims related data should be sufficient."