

2026-2027 Joint Cooperation Memorandum:

California Choice Energy Authority (CalChoice)
and
Southern California Edison Company (SCE)

Table of Contents

Introduction	3
Background/Regulatory Guidance	3
General Portfolio Coordination	3
Prior Participation and Double-Dip Prevention:.....	5
CalChoice Commercial Sector.....	6
SCE Commercial Sector	7
Commercial Coordination Protocol	7
CalChoice’s Commercial Program Decision Tree.....	8
Appendix	9
Appendix A: CalChoice Summary of Programs Offered:	9
Appendix B: SCE Summary of Programs Offered:	9

Introduction

For their 2026-2027 energy efficiency portfolios, California Choice Energy Authority (CalChoice) and Southern California Edison Company (SCE) will collaborate with each other to support program adoption. This Joint Cooperation Memorandum (JCM) documents areas of potential program overlap by sector, with details about collaboration methods that can be used to mitigate customer confusion, streamline customer referrals, and avoid duplication.

Background/Regulatory Guidance

The California Public Utilities Commission's (CPUC) Decision (D.)18-05-041 requires Energy Efficiency (EE) Program Administrators (PAs) with overlapping service areas to submit a JCM to coordinate program activities. Specifically, on p. 97, D.18-05-041 states:

We will require the PAs (RENs, IOUs, and CCA) to develop a joint cooperation memo to demonstrate how they will avoid or minimize duplication for programs that address a common sector (e.g., residential or commercial) but pursue different activities, pilots that are intended to test new or different delivery models for scalability, and/or programs that otherwise exhibit a high likelihood of overlap or duplication and are not targeted at hard-to-reach customers. For such programs, each PA must explicitly identify and discuss how its activities are complementary and not duplicative of other PAs' planned activities.

Furthermore, CPUC D.23-06-055 establishes additional requirements for PAs submitting JCMs. The decision states in ordering paragraph (OP) 35:

This decision supersedes D. 18-05-041 and D.21-05-031 with respect to the timing and submission of Joint Cooperation Memoranda (JCM). Portfolio administrators must submit JCMs every two years, within 60 days after Commission approval of the last of each JCM's portfolio administrator's true-up advice letters and mid-cycle advice letters (as applicable), to the California Energy Data and Reporting System, with notice to the service list of Rulemaking (R.) 13-11-005 or a successor proceeding.

Additionally, CPUC Resolution E-5464 (July 2, 2026) OP 4 states:

California Choice Energy Authority shall engage in Joint Cooperation Memorandums with Southern California Edison, Southern California Gas Company, Inland Regional Energy Network, and Southern California Regional Network within 90 days of the issuance of this Resolution. The Joint Cooperation Memorandums shall include a plan to avoid customer confusion between similar EE offerings.

General Portfolio Coordination

CalChoice and SCE policy and program staff will work together to establish methods of communication and collaboration to ensure cooperation and coordination of EE programs for customers in our joint service areas. CalChoice and SCE staff will jointly determine a meeting schedule for 2026-2027. Meetings

will occur on a regular basis for the Commercial program sector. Meetings may include discussions on program changes, customer choice, marketing, policy, and double dipping prevention, and may also combine multiple sectors into one meeting if both PAs agree. CalChoice and SCE staff will coordinate via email and through meetings to discuss ongoing collaboration and coordination. CalChoice and SCE recognize that several Regional Energy Networks (RENs) also administer and implement EE programs in the service areas served by SCE and CalChoice. In particular, RENs offer commercial NMEC and population NMEC programs. As such, CalChoice and SCE intend to include the relevant RENs in any ongoing collaboration and coordination, even though the RENs are not parties to this JCM (but are parties to JCMs with SCE separately). When the parties agree collaboration with the RENs would be useful, the parties will use reasonable efforts to include the staff of relevant RENs in coordination and collaboration meetings.

CalChoice and SCE will coordinate to update each other on program developments, and discuss duplication and double-dipping prevention among their general market EE program offerings:

- **Customer Choice:** Customers have a choice between CalChoice and SCE programs. Each PA or its respective implementer will independently determine eligibility under its applicable program requirements. If a PA cannot serve a customer or project, it may provide information regarding other potentially available programs. The customer retains the choice of which eligible program to pursue. The parties will not jointly allocate customers or guarantee eligibility for another PA's program. The PAs will make reasonable efforts to provide current, publicly-available program information and appropriate referral contacts to designated PA staff engaging with customers. CalChoice and SCE staff will be available to each other to answer questions, as needed. CalChoice and SCE staff also have access to program documentation available on California Energy Data and Reporting System (CEDARS) and may use it as reference when communicating program options to customers. CalChoice and SCE will keep program documents up-to-date in CEDARS and communicate program updates in their coordination meetings as needed.
- **Policy:** CalChoice and SCE are aware that program policies change over time and can affect the need for coordination. Staff will use the regular coordination calls to check in on policy changes and how to coordinate on any relevant changes.
- **Double Dipping Prevention:** CalChoice and SCE understand the potential of customers seeking to obtain incentives for the same measures from both organizations, as well as from other PAs, such as the RENs (double-dipping) and shall establish protocols to prevent such behavior. These protocols are discussed in more detail in the data sharing and double dip prevention protocols section in this document. SCE has protocols in place with other PAs to prevent double dipping, and CalChoice shall coordinate with other PAs with overlapping service areas (i.e., RENs) to prevent double dipping.

Double Dipping Protocol Data sharing is necessary to confirm a customer's prior program participation and to avoid double dipping is integral for effective coordination between CalChoice and SCE programs and to ensure proper reporting and claims of project savings. Participants in ratepayer funded programs may not receive multiple incentives for the same installed measure. Therefore, CalChoice and SCE propose the following data sharing procedures as well as steps to prevent "double dipping" from incentive, rebates, or other program funding available from CalChoice and SCE. CalChoice and SCE will

discuss potential changes to their double dip checking and other coordination procedures as the programs evolve.

- Program managers will meet on a regular basis to review general updates to programs that may impact coordination and program overlap and check on data sharing needs. CalChoice and SCE programs staff will share the responsibility of scheduling and managing meetings.
- CalChoice and SCE will each include appropriate contractual limitations in their implementer/contractor agreements that prohibit customers from receiving incentives on the same measures, consistent with the California Public Utilities Commission's rules and regulations. A party may include more restrictive participation requirements in its implementer/contractor agreements. The contractor process to seek to avoid double dipping is as follows:
 - Participating contractors and implementers of SCE and CalChoice programs will be notified of policies pertaining to double dipping, and SCE and CalChoice will include contractual provisions and program terms and conditions to forbid double dipping and to require vendors or implementers to inform customers that double dipping is not permitted;
 - Multiple violations of double-dipping policies may disqualify a contractor from program participation, at the discretion of SCE and CalChoice, respectively.
- Project enrollment forms for CalChoice will include a field identifying the last utility incentive received, and the scope of work covered by the project, if any;

Prior Participation and Double-Dip Prevention:

- CalChoice and SCE shall employ the following process for prior and current customer participation checks to avoid duplication of issuance of incentives and claims. Upon receiving a sufficiently specific participation-check request, each PA will confirm whether the identified customer, site, project, or measure has prior or current participation that may present a potential overlap. Any information exchanged will be limited to the minimum information reasonably necessary to perform the participation check and will be handled in accordance with applicable privacy, confidentiality, security, and data-governance requirements.
- CalChoice may share such SCE-provided information with its contractor or vendor only: (a) to the extent such sharing is necessary for CalChoice to administer and implement its EE program(s); and (b) subject to such contractor or vendor and SCE executing a non-disclosure agreement (NDA); and (c) subject to such contractor's or vendor's prior completion and approval of a cybersecurity review by SCE, which shall be provided by SCE in writing (email acceptable) in its discretion.
- CalChoice and SCE will discuss potential changes to their programs as soon as reasonably practical, at regularly scheduled meetings between the parties. The PAs will discuss how changes may affect both of their programs, and each party is responsible for informing the appropriate program team members in their organization so they can accurately represent the programs to customers in an effort to prevent customer confusion. Any discovery of dual enrollment in both Cal Choice and/or SCE's program, or another PA program, will be evaluated further at the measure level to assess if there is double dipping. In the event that both SCE and CalChoice have claimed the same project measures, each PA will determine how the project will be claimed, and

review cost-recovery options with the program partner or customer that has received funding twice for the same measure.

Overlapping Sectors by Program Administrators (PA)

Table 1: Areas of Potential Sector Overlap

Sector	CalChoice	SCE
Commercial	• Perform and Save	• Commercial Energy Reduction Initiative • Comprehensive Refrigeration Energy Savings and Training • Measured Savings Program • Refrigeration Efficiency and Leak Mitigation • Grid-Responsive Incentive Design Market Access Program

CalChoice Commercial Sector

Program Summary:

The Perform and Save Program will provide cost-effective energy efficiency retrofits, using a population-based normalized metered energy consumption (NMEC) approach to serve CalChoice's customers. As an alternative to the traditional "custom" or "deemed" programs, the population NMEC program approach enables program administrators to provide incentives for energy efficiency retrofits using an overall reduction in metered consumption. CalChoice's program will largely target small commercial customers. Targeting may be done for administrative considerations, such as ensuring there is no overlap with other programs in the territory.

Customers can participate in the Program with a range of measures that generate verifiable energy savings. The Program offers a payment for energy reductions that values a range of resources equally to ensure that incentives flow to projects with verifiable impacts and allow for different behind-the-meter solutions to work together in a coordinated way.

The Program is technology and measure agnostic by design. It can integrate a wide range of measures including traditional efficiency such as lighting and HVAC retrofits. Other solutions that generate verifiable results can also be accommodated without administrative requirements.

By offering payment for energy impacts that value technologies and strategies equally, the Program ensures that incentives are directed towards the technologies and providers that can deliver energy impacts most effectively, thereby minimizing performance risk to the program and optimizing the deployment of demand flexibility solutions.

SCE Commercial Sector

Commercial Energy Reduction Initiative (CERI): SCE_3P_2025C_001

The CERI program provides flexible pathways for commercial customers to pursue near-term energy reductions. The program leverages Site NMEC, Deemed, and Custom measures with personalized customer engagement. Targeted customers include those in healthcare, high-tech, biotech, private school and college subsectors.

Comprehensive Refrigeration Energy Savings and Training (CREST): SCE_3P_2025C_002

The CREST program serves commercial customers with energy-intensive refrigeration, process cooling, and HVAC systems. Through NMEC, Deemed, and Custom savings pathways, CREST provides technical assistance, project incentives, refrigeration operator training, and support for low-GWP refrigerant projects to help customers achieve sustained energy savings and long-term sustainability goals.

Measured Savings Program: SCE_3P_2025MAP_002C

The Measured Savings Program (MSP) is a pay-for-performance offering that enables commercial customers to achieve weather-normalized, NMEC-based energy savings through aggregator-led demand-side projects. By aligning incentives with Total System Benefit and leveraging AESC's Praxis platform, the program streamlines participation, accelerates project deployment through upfront funding, and delivers measurable, cost-effective benefits to both customers and the grid.

Refrigeration Efficiency and Leak Mitigation (REALM): SCE_3P_2025C_003

REALM is a commercial energy efficiency program that helps supermarkets, grocery stores, and other food retailers identify and implement refrigeration system improvements, reduce refrigerant leaks, and optimize energy performance through data analytics, engineering assessments, and financial incentives. The program delivers measurable energy savings, reduced operating costs, and enhanced equipment performance.

Grid-Responsive Incentive Design Market Access Program (GRID-MAP): SCE_3P_2025MAP_001C

GRID-MAP enables contractors and aggregators to develop and deliver NMEC-based energy efficiency projects that align energy savings with grid needs. Through a centralized platform, the program streamlines customer enrollment, project scoping, measurement and verification, and incentive administration to accelerate implementation and maximize grid value.

Public Energy Performance Program

The Public Energy Performance (PEP) Program helps public sector customers achieve sustained, whole-building energy savings through a combination of Strategic Energy Management (SEM), technical assistance, and energy efficiency incentives. By supporting multi-year commitments and integrating operational improvements with traditional energy efficiency projects, the program delivers measurable energy performance improvements while helping participants build long-term energy management capabilities.

Commercial Coordination Protocol

CalChoice and SCE staff will hold coordination update meetings on a quarterly basis, or as otherwise agreed to by CalChoice and SCE. Ad-hoc meetings may also be scheduled to accommodate the need to resolve any urgent issues that might arise. Standing agenda items may include walk-in agenda items,

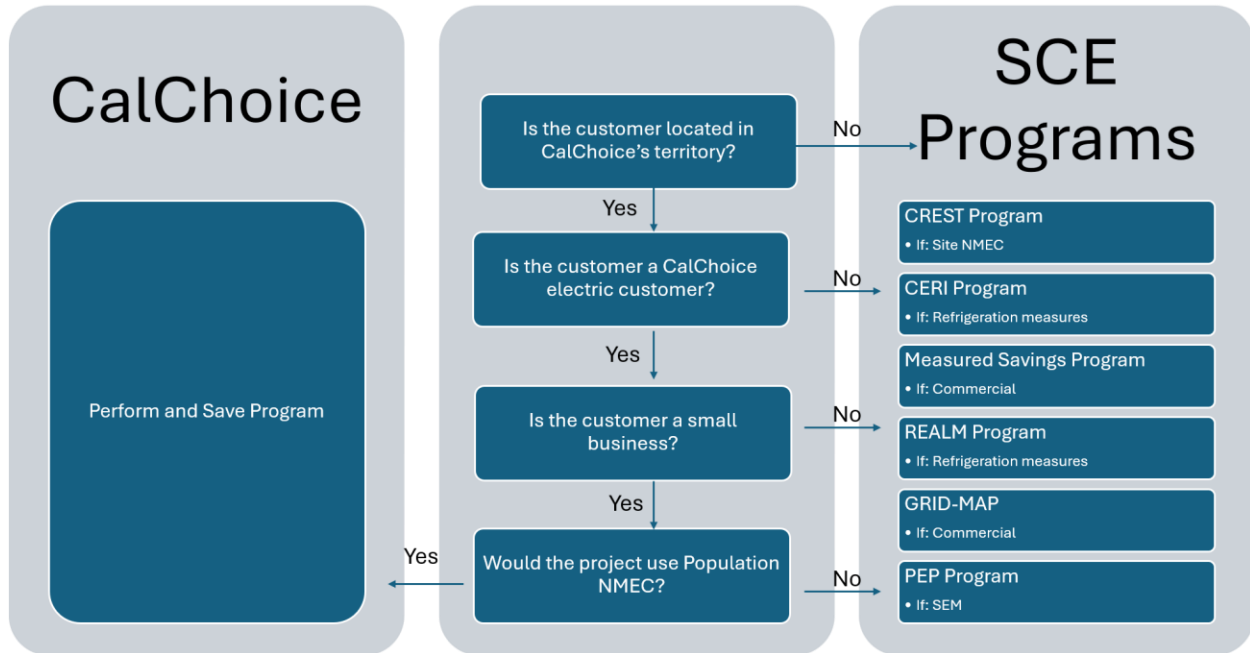
regulatory/CPUC updates, PA program updates, coordination opportunities, coordination best practices, coordination challenges, future meetings, and action items.

CalChoice and SCE's coordination protocol activities will include the following:

- **Implementer Coordination:** CalChoice and SCE program staff and implementers will coordinate closely and if necessary, attend regularly scheduled meetings until implementers achieve a cadence conducive to coordination efficiency. This meeting is different from the quarterly coordination update meetings. It has been found that the best practice of allowing for implementer level direct coordination leads to more timely execution of plans and/or avoidance of, and resolution of issues.
- **Coordination Update Meetings:** Each PA shall provide updates regarding program launches, significant program modifications, enrollment trends, and other developments that may affect customer eligibility or participation. In the Regional Energy Network space, there are Portfolio Administrator Sector Coordination (PASC) meetings held every quarter that serve the same purpose. These meetings are high level updates and coordination meetings, while the implementer-specific coordination meetings are intended for more detailed coordination between CalChoice and the entity actually implementing the relevant program.
- **Prior Participation and Double-Dip Prevention:** As discussed above, CalChoice and SCE will continue utilizing the data sharing and participation review procedures established in this JCM to identify prior program participation and prevent duplicate incentives for the same measures or project scope.
- **Program Differentiation.** CalChoice's Perform and Save program primarily targets commercial customers through a population-based NMEC framework that is technology- and measure-agnostic and focused on measured energy reductions. SCE's portfolio includes a broader range of commercial offerings serving varying customer segments through NMEC, SEM, refrigeration, custom, deemed, and market access delivery approaches. Coordination activities will help ensure these offerings remain complementary and that customers are directed to the program best aligned with their project needs.

CalChoice's Commercial Program Decision Tree

The following is CalChoice's Decision Tree concerning whether to pursue or accept customers into the Perform and Save Program.



Appendix

Appendix A: CalChoice Summary of Programs Offered:

Program Name	Sector	Annual Budget	Eligible Measures
Perform and Save	Commercial	2026: \$270,300 2027: \$1,621,800 2028: \$810,900 Total: \$2,703,000	Lighting HVAC retrofit

Appendix B: SCE Summary of Programs Offered:

Program Name	Sector	Annual Budget	Eligible Measures
Commercial Energy Reduction Initiative	Commercial	2025: \$1,179,122 2026: \$2,410,729 2027: \$7,945,557 2028: \$6,806,203 2029: \$1,649,886 Total: \$19,991,497	Site NMEC Custom Electrification Deemed offerings (broad allowed measure list centered on HVAC, HPWH, and controls)
Comprehensive Refrigeration Energy Savings and Training	Commercial	2025: \$300,000 2026: \$379,301 2027: \$1,209,486 2028: \$1,806,154 2029: \$1,936,006 2030: \$880,084 Total: \$6,511,030	NMEC BRO NMEC Capital Custom Capital Electrification Deemed offerings High GWP Refrigerant Swap-Out

Measured Savings Program	Commercial	2025: \$3,200,273 2026: \$8,404,419 2027: \$8,394,279 Total: \$19,998,971	NMEC site and NMEC population. Any measure that reduces energy use qualifies for the program, including to-code, Industry Standard Practice, custom measures (such as accelerated replacement, add-on equipment, weatherization, behavioral, retrocommissioning (RCx), BRO projects, and deemed measures. Eligible project types include comprehensive building retrofits, HVAC, refrigeration, lighting, RCx, and load shifting when paired with energy efficiency measures. New construction and added-load measures are not eligible.
Refrigeration Efficiency and Leak Mitigation	Commercial	2025: \$448,000 2026: \$2,427,000 2027: \$2,124,900 Total: \$4,999,900	Refrigeration system upgrades, refrigerant leak reduction, controls optimization, HVAC improvements, lighting upgrades, operational efficiency enhancements, and whole-building energy efficiency measures for food retail facilities.
GRID-MAP	Commercial	2025: \$5,605,104 2026: \$7,197,163 2027: \$7,197,730 Total: \$19,999,997	NMEC site and NMEC population. Any measure that reduces energy use qualifies for the program, including to-code, Industry Standard Practice, custom measures (such as accelerated replacement, add-on equipment, weatherization, behavioral, retrocommissioning (RCx), BRO projects, and deemed measures. Eligible project types include comprehensive building retrofits, HVAC, refrigeration, lighting, RCx, and load shifting when paired with energy efficiency measures. New construction and added-load measures are not eligible.
Public Energy Performance Program	Commercial	2023: \$380,197 2024: \$891,562 2025: \$2,165,109 2026: \$3,477,965 Total: \$6,914,833	SEM, Deemed and Custom offerings. Commercial refrigeration Heating, Ventilation, and Air Conditioning (HVAC) Commercial ovens Demand Control Ventilation (DCV) Economizer Commercial pools Water Heaters Controls

			Interior, Advanced Lighting Comprehensive retrofits Behavioral, Retro commissioning, and Operational (BRO)
--	--	--	---