

Proceeding: A.26-03-
Exhibit No.: I-REN-04
Date: March 16, 2026
Witness(es): Dailey, Casey
Druyon, Benjamin
Marchant, Margaret
Larson, Kristin
Wright, Will
Barba, Nancy

I-REN

Exhibit 4: Testimony Appendices

APPENDIX A – STATEMENTS OF QUALIFICATION

APPENDIX B – SUPPLEMENTAL BUDGET INFORMATION NARRATIVE

APPENDIX C – ORDERING PARAGRAPH 2 STATEWIDE ASSESSMENT + SURVEY

APPENDIX D – ORDERING PARAGRAPH 23 DEMOGRAPHIC DATA REPORTING
DELIVERABLE

APPENDIX A
STATEMENTS OF QUALIFICATION

STATEMENT OF QUALIFICATIONS OF CASEY DAILEY
2028-2031 Portfolio Plan and 2032-2035 Business Plan

1955 Chicago Ave., Suite 200, Riverside, CA 92507

Description of responsibilities

I am the Director of Energy & Environmental Programs with the Western Riverside Council of Governments (WRCOG). This position places me as a key member of WRCOG's leadership team, reporting to the Executive Director and overseeing a significant department within the organization's structure. In this role, I oversee a comprehensive portfolio of regional and statewide programs designed to serve the public sector, residential, and business communities with the following core objectives:

- Reduce energy consumption
- Decrease greenhouse gas emissions
- Reduce landfill waste
- Increase the use of alternative fueled vehicles
- Spark economic development through sustainable initiatives

Along with oversight of the Inland Regional Energy Network program, I oversee a statewide Commercial Property Assessed Clean Energy (C-PACE) Program that provides competitive financing for:

- Energy efficient improvements
- Renewable energy installations
- Water conservation projects
- Seismic improvements to businesses
- Fire hardening upgrades
- Electric vehicle charging infrastructure

I also oversee a Regional Streetlight Program that achieved significant results:

- Acquisition of approximately 50,000 streetlights from 11 member agencies
- Secured \$3.6 million in rebates from Southern California Edison
- Generating \$5 million annually in savings across participating cities
- LED conversion completed for all acquired streetlights

In addition, I oversee a Clean Cities Coalition program, a Solid Waste and Recycling Program, and a Used Oil Recycling program, all with their own unique goals and results.

Summary of educational and professional background

I have been with WRCOG since 2017. Prior to joining WRCOG, I worked as a Director of Government Affairs for the Building Industry Association (Baldy View Chapter), Transit Analyst for the San Bernardino County Transportation Authority, Assistant to the Mayor at

the City of San Bernardino, Management Analyst for the City of Calimesa, and Graduate Management Intern for the Department of Finance in the City of Colton, among others.

In 2007, I obtained a Master of Public Administration from California State University, San Bernardino. I live in the City of San Bernardino, where I serve on the Planning Commission, Charter Advisory Committee, General Plan Advisory Committee and Measure S Oversight Committee.

STATEMENT OF QUALIFICATIONS OF BENJAMIN DRUYON
2028-2031 Portfolio Plan and 2032-2035 Business Plan

1955 Chicago Ave., Suite 200, Riverside, CA 92507

Description of responsibilities

I am a Program Manager with the Western Riverside Council of Governments (WRCOG), who is the Administrative Lead Agency for the Inland Regional Energy Network (I-REN). I oversee the day-to-day operations of I-REN. In this role, I procure and manage contracts, manage budget, invoicing, and all administrative aspects of I-REN. I also have a heavy focus on the legislative and regulatory aspects of being a Program Administrator (PA) for the California Public Utilities Commission (CPUC). All of I-REN's programs are designed to further the Strategic Plan goals of the CPUC and assist the State of California in achieving energy savings, lowering Greenhouse Gas Emissions, reducing energy bills, and increasing workforce job opportunities.

I am the lead Program Manager for I-REN and oversee each of I-REN's sectors, which are Public, Workforce Education & Training, and Codes and Standards. In my current position, I am tasked with coordinating between our partner COGs (Council of Government), PAs, IOUs (Investor-Owned Utility), CPUC staff, Consultants, and I-REN staff, to ensure efficient and effective program outcomes.

In addition, I previously oversaw programs such as a regionally run Property Assessed Clean Energy program (PACE), Solid Waste and Recycling program, Used Oil program, Tire Recycling program, and was heavily involved with the startup and ongoing operations of a Community Choice Aggregation (CCA) program. All of the programs mentioned are designed to:

- Reduce energy consumption
- Decrease greenhouse gas emissions
- Reduce landfill waste
- Increase the use of alternative fueled vehicles
- Spark economic development through sustainable initiatives

Summary of educational and professional background

I have been with WRCOG since 2021. Prior to joining WRCOG, I worked as a Management Analyst with the Coachella Valley Association of Governments (CVAG) for 9 years. While at CVAG, I oversaw a regional PACE program, a Solid Waste and Recycling program, a Used Oil program, a Tire Recycling program, and was heavily involved with the startup and ongoing operations of a CCA program, called Desert Community Energy. Before I gained employment at CVAG, I worked for the City of Palm Desert for about 9 years, where I was involved with a solar installation project, running the first PACE program in the nation, and conducted hundreds of energy audits.

I began my career in government as an intern at the City of Palm Desert while attending College of the Desert in pursuit of an associate degree. I was then hired as a business license technician before being promoted to an Energy Project Technician.

**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 Inland Regional Energy Network (I-REN). In this role, I lead Frontier Energy's contributions to and coordination of I-REN'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 I-REN's portfolio.

Previously I served as lead author of the 2022-2027 program funding application for I-REN, 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 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 KRISTIN LARSON
2028-2031 Portfolio Plan and 2032-2035 Business Plan**

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

Description of responsibilities

I am an Energy Technical Program Manager with Frontier Energy, Inc., which provides technical and regulatory consulting services to Inland Regional Energy Network (I-REN). In this role at Frontier Energy, I led the compilation of the Business Plan Application Workbook and other technical components throughout the application such as policy recommendations, data reporting, and guidance on program strategies.

I also supported I-REN's Mid-Cycle Advice Letter (MCAL) filing in 2025, along with supporting MCAL filings for Tri-County Regional Energy Network and Northern Rural Energy Network in the same role.

Summary of educational and professional background

I have been with Frontier Energy since 2025. Prior to joining Frontier Energy, I worked as the Director of Energy and Sustainability at San Diego State University, with responsibilities that included submitting annual reporting for the California Air Resources Board Cap-and-Invest Program (formerly Cap-and-Trade).

Bachelor of Science, Environmental Sciences, University of Massachusetts, Amherst, May 2009

Master of Science, Environmental Science and Policy, Johns Hopkins University, Baltimore, August 2013

STATEMENT OF QUALIFICATIONS OF WILL WRIGHT
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 Inland Regional Energy Network (I-REN). In this role, I facilitated the portfolio budgeting process, and supported all related budgeting tasks across the Business Plan Application, including the Workbook, Narrative, and Supplemental Budget Narrative.

I also supported I-REN's Mid-Cycle Advice Letter (MCAL) filing in 2025, along with supporting MCAL filings for Tri-County Regional Energy Network and Northern Rural Energy Network in the same role.

Summary of educational and professional background

I have been with Frontier Energy since 2024. Prior to joining Frontier Energy, I worked as a Financial Analyst with E&S Ring Management, with responsibilities including leading the budgeting and financial reporting process for a large real estate investment portfolio consisting of \$1b+ in value across 30+ properties.

Bachelor of Arts, Public Policy, University of Michigan - Ann Arbor, April 2019

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, the Frontier Energy 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 population of regulatory reporting tables, and ensure technical guidance is current and appropriate for the proposed sectors and segments.

For the Inland Regional Energy Network, 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 for the California Energy Efficiency Coordinating Committee (CAEECC), and support navigating the regulatory landscape. As part of this role, I provided oversight and lead authorship for I-REN's initial business plan submitted in 2021. Prior to that, I provided strategic consulting and guidance on the development of the I-REN organization in preparation for their motion to become a regional energy network portfolio administrator for CPUC-regulated energy efficiency programs.

For local government clients I consult on program design, including measure package selection and strategic customer engagement for workforce education and training, codes and standards, and public sector programs. I have supported dozens of successful filings of annual budget advice letters, program implementation plans, joint cooperation memorandums, application filings, 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 of Residential Green Programs at Sustainable Works serving the City of Santa Monica.

I earned a Bachelor of Science in Business Administration from California State University, Long Beach.

I am a LEED, Accredited Professional, a Certified Green Building Professional and a Certified GreenPoint Advisor.

APPENDIX B

SUPPLEMENTAL BUDGET INFORMATION NARRATIVE

ATTACHMENT B

(Modified to Incorporate Dates Relevant to D.21-05-031)

**Approved Meet & Confer Document by Program Administrators, Office of Ratepayers and
The Utility Reform Network in A.17-01-003 et. al.**

Required by D.18-05-041 Ordering Paragraph 44

Table of Contents

Background:.....	1
I. DESCRIPTION OF IN-HOUSE EE ORGANIZATIONAL STRUCTURE & ASSOCIATED COSTS	1
A. Narrative description of in-house departments/organizations supporting the PA’s EE portfolio.....	1
B. Table showing PA EE “Full Time Equivalent” headcount by department/organization....	3
C. Table showing costs by functional area of management structure	4
D. Table showing cost drivers across the EE organization	6
E. Explanation of allocation of labor and O&M costs between EE-functions and GRC-functions or other non-EE functions.....	8
II. BUDGET TABLES INCLUDING INFORMATION IDENTIFIED IN THE SCOPING MEMO	9
A. Attachment-A, Question C.8.....	9
B. Attachment-A, Question C.9.....	11
C. Attachment-A, Question C.10.....	13

Attachment B

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

BACKGROUND:

Decision (D.) 18-05-041 Ordering Paragraph 44 states:

Beginning with the annual budget advice letters due on September 3, 2019, the program administrators must include updated budget estimates in the same format as the supplemental budget information filed in this proceeding on June 12, 2017.

Therefore, consistent with this Commission direction, this narrative and the accompanying Attachment A Tables 6 through 8, I-REN provides the following information in Attachment B.

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

The COGs each have an Executive Committee that sets policy and oversees the budgets for the COGs. For I-REN, they provide an oversight role to ensure accountability and service to the member cities. Representatives from the cities, the County Board of Supervisors, and the Municipal Water Districts collectively have seats on the Executive Committees for WRCOG, CVAG, and SBCOG. By working together through the committee structure and utilizing resources, the COGs are cost-effective by reducing duplication of effort and sharing information, enabling strong advocacy and strengthening the IE region's standing.

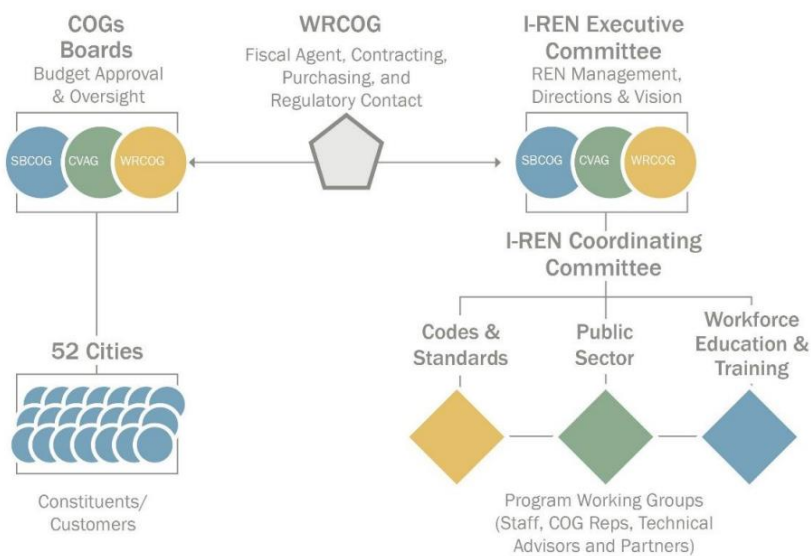
WRCOG serves as the fiscal agent, purchasing and contracting entity, and primary regulatory contact manager for I-REN. WRCOG does not have more decision-making power than the other COGs but works through the committee structure to ensure equal engagement for the entire region and equitable services supporting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

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

Meaningfully Participate in the CPUC’s Decision-Making Process and Benefit from CPUC Programs.

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

2. Energy Efficiency Management Structure and Org Chart



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

I-REN’s response is included below in Table 1: Portfolio FTE.

Table 1: Portfolio FTE

Expense Type	Functional Group	Type	2028	2029	2030	2031
Labor	Policy, Strategy, and Regulatory Reporting Compliance	FTE	1.0	1.0	1.0	1.0
Labor	Program Management	FTE	17.4	20.8	23.7	26.7
Labor	Engineering Services	FTE				
Labor	Customer Application/Rebate/Incentive Processing	FTE				

Expense Type	Functional Group	Type	2028	2029	2030	2031
Labor	Customer Project Inspections	FTE				
Labor	Portfolio Analytics	FTE				
Labor	EM&V	FTE				
Labor	ME&O (Local)	FTE				
Labor	Account Management / Sales	FTE				
Labor	IT	FTE				
Labor	Call Center	FTE				
Labor	Total	FTE	18.3	21.8	24.7	27.6

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.

I-REN employs contractors and advisory consultants for program-specific tasks, and REN-wide tasks (regulatory support, outreach, portfolio planning, etc.) that support its full portfolio of programs. When tasks are performed for the full portfolio, the associated labor costs are assigned proportionally to each program.

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

I-REN continues to implement best practices for program implementation in its delivery of EE programs. Accordingly, the anticipated in-house cost changes are driven by increases in labor and staffing costs. I-REN develops its portfolio budget based on estimated staff hours, which are multiplied by fully burdened labor rates to calculate total labor costs. Changes to either staff hour assumptions or labor rates will lead to in-house cost changes. In its portfolio budget for 2028-2031, I-REN estimates increases in staff hours commensurate to the expansion of program delivery.

6. Explanation of method for forecasting costs

I-REN’s method for forecasting costs is discussed in more detail in response to Question #20.

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

I-REN’s response is included below in Table 2: FTE by Organization.

Table 2: FTE by Organization¹

	2028	2029	2030	2031
CVAG	2.5	4.0	5.0	5.5
SBCOG	3.6	4.6	5.6	6.1
WRCOG	12.2	13.2	14.1	16.0
Total	18.3	21.8	24.7	27.6

C. Table showing costs by functional area of management structure

8. Expenses broken out into labor, non-labor O&M (with contract labor identified) (*

Note, in case of conflict, excel budget template will control.)

I-REN’s response is included below in Table 3: Labor and Non-labor Costs.

Table 3: Labor and Non-labor Costs.

Expense Type	Functional Group	Type	2028	2029	2030	2031
Labor	Policy, Strategy, and Regulatory Reporting Compliance	Budget	485,649	502,647	520,240	538,448
Labor	Program Management	Budget	4,504,786	5,584,677	6,460,759	7,370,139
Labor	Engineering Services	Budget				
Labor	Customer Application/Rebate/Incentive Processing	Budget				
Labor	Customer Project Inspections	Budget				
Labor	Portfolio Analytics	Budget				
Labor	EM&V	Budget				
Labor	ED Portfolio Oversight	Budget				
Labor	ME&O (Local)	Budget				
Labor	Account Management / Sales	Budget				
Labor	IT	Budget				
Labor	Call Center	Budget				
Labor	Total	Budget	4,990,435	6,087,324	6,980,999	7,908,587

¹ Full-Time Equivalents (FTEs) represent 2,000 employee hours per year. Because I-REN labor is budgeted based on staff time allocations, fractional FTE values may be used where employees devote fewer than 2,000 hours annually to I-REN programs.

Expense Type	Functional Group	Type	2028	2029	2030	2031
Non-Labor	Third-Party Implementer (as defined per D.16-08-019, OP 10)	Budget	4,003,500	4,150,625	4,248,356	4,316,724
Non-Labor	Local/Government Partnerships Contracts	Budget	1,500,000	1,500,000	1,500,000	1,500,000
Non-Labor	Other Contracts	Budget	-	-	-	-
Non-Labor	Program Implementation	Budget	3,673,200	3,728,968	4,277,510	4,898,966
Non-Labor	Policy, Strategy, and Regulatory Reporting Compliance	Budget	1,635,000	1,642,500	165,375	173,644
Non-Labor	Program Management	Budget	-	-	-	-
Non-Labor	Engineering services	Budget	-	-	-	-
Non-Labor	Customer Application/Rebate/Incentive Processing	Budget	-	-	-	-
Non-Labor	Customer Project Inspections	Budget	-	-	-	-
Non-Labor	Portfolio Analytics	Budget	-	-	-	-
Non-Labor	EM&V	Budget	748,631	807,269	814,263	886,595
Non-Labor	ED Portfolio Oversight	Budget	-	-	-	-
Non-Labor	ME&O (Local)	Budget	21,000	21,035	21,071	21,109
Non-Labor	Account Management / Sales	Budget	-	-	-	-
Non-Labor	IT	Budget	144,000	144,000	144,000	144,000
Non-Labor	Call Center	Budget	-	-	-	-
Non-Labor	Facilities	Budget	-	-	-	-
Non-Labor	Incentives--(PA-implemented and Other Contracts Program Implementation) Programs	Budget	2,000,000	2,100,000	2,205,000	2,315,250
Non-Labor	Incentives--Third Party Program (as defined per D.16-08-019, OP 10)	Budget	-	-	-	-
Non-Labor	Total	Budget	13,725,331	14,094,396	13,375,575	14,256,287
Labor + Non-Labor	Total	Budget	18,715,765	20,181,720	20,356,574	22,164,875

9. Identify any capital costs

I-REN has not included any capital costs in its Portfolio Budget.

D. Table showing cost drivers across the EE organization

10. TURN and CAL PA like this example, taken from testimony PG&E’s 2017 GRC addressing its Energy Procurement department.

- While this example pertains to departmental cost increases, in our case, cost increases or decreases would be attributed to major cost drivers.

**TABLE 6-2(a)
EP COST INCREASE
2015-2017 EXPENSE BY COST DRIVER**

Line No.	Description	Increase in Thousands of \$	Percent of Total Increase
1	Escalation	3,597	57
2	Portfolio Complexity	1,138	18
3	Regulatory Mandates	1,192	19
4	Process Improvements	400	6
5	Total	6,324	100

(a) See WP Table 6-6, Exhibit (PG&E-5).

The main factors driving strategic budget increases across I-REN sectors and segments for the BPA are summarized below, and reflected in the cost category budgets in Tables 4 and 5.

- Workforce Education & Training (WE&T) – Market support
 - I-REN Energy Fellowships have grown significantly year after year since program launch and play an important role in supporting public sector project development, and in order to build upon that success, I-REN anticipates doubling the number of fellows by 2031.
 - The Riverside and San Bernardino County workforce development partnerships are expected to grow over the 8-year horizon of the BPA, aligned with stakeholder input and I-REN workforce assessment research indicating a need for enhancing workforce support to the region.
 - I-REN will continue its outreach and partnerships with local career fairs and education pipelines to continue developing and improving a pathway for the training of a local clean energy workforce.
 - Based on guidance provided by CPUC Energy Division staff, I-REN will explore how its workforce efforts can support contractor enrollment in the utility-run low-income Energy Savings Assistance Programs, creating an additional direct link between I-REN workforce and energy efficiency installations benefiting underserved customers.
- Codes & Standards (C&S)
 - Trainings offered by I-REN’s team are expected to increase, along with Spanish-language simulcasts. I-REN also plans to launch a learning management system to make trainings available online and track participation metrics. I-REN will also

explore cross-cutting training opportunities between C&S and WE&T using I-REN’s established C&S training platform. In response to requests from local jurisdictions and I-REN Executive Committee members, I-REN plans to begin offering support to local jurisdictions to develop local electrification plans in order to comply with AB 39.

- Public Sector - Equity
 - Stakeholders have indicated that public sector technical support continues to be necessary to support normalized metered energy consumption (NMEC) project development and will be crucial for ensuring that public sector agencies can complete projects and receive incentives. I-REN proposes to increase the technical support budget to enable more NMEC projects to occur.

Table 4: 2028-2031 Budget by Cost Category (without EM&V)

	2028	2029	2030	2031	4-yr Budget Total
Administration	717,043	836,587	936,291	1,039,889	3,529,811
Marketing and outreach	505,522	571,651	627,934	681,241	2,386,348
Direct Implementation - non-incentive	14,744,570	15,866,213	15,773,087	17,241,899	63,625,769
Direct Implementation - incentives	2,000,000	2,100,000	2,205,000	2,315,250	8,620,250
Subtotal	17,967,135	19,374,451	19,542,311	21,278,280	78,162,177

Table 5: 2032-35 Budget by Cost Category (without EM&V)

	2032	2033	2034	2035	4-yr Budget Total
Administration	1,077,403	1,124,886	1,165,466	1,207,515	4,575,270
Marketing and outreach	706,508	737,022	764,358	792,711	3,000,600
Direct Implementation - non-incentive	17,789,950	18,535,945	19,236,996	19,964,816	75,527,706
Direct Implementation - incentives	2,407,860	2,504,174	2,604,341	2,708,515	10,224,891
Subtotal	21,981,721	22,902,027	23,771,161	24,673,557	93,328,467

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

11. 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.).

I-REN is a non-IOU Portfolio Administrator, and as such, does not engage in GRC-functions. Similarly, REN partners track staff time by activity, and submit invoices only for labor associated with the relevant I-REN program. Labor costs are fully loaded, and indirect costs are allocated and billed to I-REN in proportion to the portion of staff labor dedicated to I-REN activities.

WRCOG receives, tracks, and reviews each REN partner's labor invoices on a monthly basis to ensure costs are being billed appropriately.

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

This is not applicable as I-REN does not have any EE balancing accounts.

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

The EE functions that are most likely to be performed by employees who also do non-EE work are Program Management and Policy, Strategy, and Regulatory Reporting Compliance.

15. 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 is not applicable as I-REN is a non-IOU PA.

16. 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?

General O&M costs are factored into the fully burdened labor rates paid by each program. Staff tracks their time by program and invoices break out labor costs by program. Thus, the overhead costs are paid appropriately by each program.

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

This is not applicable as I-REN is a non-IOU PA.

II. BUDGET TABLES INCLUDING INFORMATION IDENTIFIED IN THE SCOPING MEMO

This section refers to the April 14, 2017 Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judges in A.17-01-003 et. al.

A. Attachment-A, Question C.8

“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. 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.8 Table.

I-REN’s response is included below in Tables 6 – 7.

Table 6: 4-Year Portfolio Budget Forecast Summary (2028-31) (\$000)

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

4-year Portfolio Forecast Summary (2028-2031) (cont.)

	2028	2029	2030	2031	Resource Acquisition Segment Only (Total 4-year)	Entire Portfolio (Total 4-year)
Total System Benefit (TSB)	562,987	624,627	682,859	741,429	-	2,611,902.00
Total Resource Cost (TRC) Ratio	0.03	0.03	0.03	0.03	-	0.03

	2028	2029	2030	2031	Resource Acquisition Segment Only (Total 4-year)	Entire Portfolio (Total 4-year)
Program Administrator Cost (PAC) Ratio	0.03	0.03	0.03	0.03	-	0.03
Societal Cost Test (SCT) - Base	0.04	0.04	0.04	0.04	-	0.04
Societal Cost Test (SCT) - High	0.04	0.04	0.04	0.04	-	0.04
Ratepayer Impact Measure Test Ratio (RIM)	0.03	0.03	0.03	0.03	-	0.03
Lifecycle MWh/GWh	7,252.63/ 7.25	7,615.26/ 7.62	7,996.02/ 7.996	8,395.82/ 8.396	-	31,259.72/ 31.260
First Year MW	0.50	0.52	0.55	0.58	-	2.14
Lifecycle MMETHERMS	0.00	0.00	0.00	0.00	-	0.00
Lifecycle Net Electric CO2 Metric Tons	1,555	1,626	1,720	1,815	-	6,717
Lifecycle Net Gas CO2 Metric Tons	56	59	62	65	-	243

Table 7: 4-year Portfolio Budget Forecast Summary (2032-2035) (\$000)

	2032	2033	2034	2035	Total (4-year)
Total Budget	22,898	23,856	24,762	25,702	97,217
Resource Acquisition Segment Budget	-	-	-	-	-
Market Support Segment Budget	7,878	8,203	8,512	8,834	33,427

	2032	2033	2034	2035	Total (4-year)
Equity Segment Budget	10,264	10,687	11,098	11,525	43,574
Codes and Standards Budget	3,840	4,011	4,161	4,315	16,327
EM&V	916	954	990	1,028	3,889
ED Portfolio Oversight	-	-	-	-	-

B. Attachment-A, Question C.9

“Using a common budget template developed in consultation with interested stakeholders (hopefully agreed upon at a “meet and confer” session), display how much of each year’s budget each PA anticipates spending “in-house” (e.g., for administration, non-outsourced direct implementation, other non-incentive costs, marketing), by sector and by cross-cutting program.”

19. TURN and CAL PA invite the PAs to propose a common table format for this information. We don’t have anything specific in mind.

I-REN’s response is included below in Table 8: Budget Distribution by Sector.

Table 8: Budget Distribution by Sector (000)

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

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

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

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

After labor and non-labor costs were forecasted for each program for 2028-31, the full portfolio budget was reviewed to ensure all additional activities were accounted for and all cost assumptions were reasonable. During this review, I-REN examined the proportionality of its portfolio budget request to that of both IOUs that serve its territory, while also considering the HTR populations that it seeks to serve. Forecasted expenses were adjusted as appropriate, and once the annual budgets were finalized for 2028-2031, a cost-of-living adjustment of 4% per year was applied for the remaining years in the cycle.

C. Attachment-A, Question C.10

“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).”

21. 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.

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

APPENDIX C

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 D

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

¹¹ 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 Dilman 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: <ul style="list-style-type: none"> - 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)
SoCalREN	Optional customer surveys conducted after program participation is another way to gather information directly from the individuals or families who received services.
PCE	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	First Name, Last Name, Customer ID, Email, Phone, Project Address, Utility Provider, Building Type	No	
PG&E	Compliance Improvement PGE21053	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Collect customer ID.	Yes	
SCE	All Programs reported at a customer level	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A
SDG&E	4184- Non-Residential Behavioral Program Business Energy Reprints (BER)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			

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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
SDG&E	4178 - COM SW-HVAC Program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	This commercial program has not yet been setup in EEEP 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
SDG&E	3226 - Business Energy Solutions	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tribal customers are not eligible for this program.		
SDG&E	4169 - Groceries, Restaurants, and Food Storage	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tribal customers are not eligible for this program.		
SDG&E	4170 - SD Energy Edge (Retail, Office, Wholesale Program)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tribal customers are not eligible for this program.		
SDG&E	4176- Residential Equity Education & Outreach	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Region via the address collection.		
SDG&E	4173- Small Business Outreach	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			
SDG&E	4166 - Statewide Plug-Load and Appliance Program (SW-PLA)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	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)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	This commercial program has not yet been setup in EEEP 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> 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 fletrips) Learning disability (Program Application)
SoCalREN	Green Path Careers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	In addition to the provided fields, GPC is currently tracking gender as part of its demographic data collection.		
SoCalREN	WE&T Opportunity HUB	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			Program not officially launched as of April 2025
SoCalREN	Agriculture WE&T	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> 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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	No, we record this info per participant (re "Region")	
BAY	Codes and Standards Program	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Participant addresses are captured.	No	
BAY	Commercial	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Address, City, First and Last Name, Zip Code, Census Tract, Rate Code		
PCE	FLEXMarket	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Region: via the address	No	
SCG	SCG3702 Residential Energy Efficiency Program (Resource)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3958 Residential Energy Efficiency Program (Equity)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3935 Residential Advanced Clean Energy Program (Equity)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3883 Residential Advanced Clean Energy Program (Resource)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3884 Comprehensive Manufactured Homes Program	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3885 Manufactured Home Program	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3705 Multifamily Whole Building Program (Equity)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3938 Multifamily Whole Building Program (Resource)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3889 Multifamily Energy Alliance Program (Resource)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG Multifamily Energy Alliance Program	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3829 SoCalGas Marketplace	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Business Name, First Name, Last Name, Address, Phone, Email	No	
SCG	SCG3899 Large Public Sector Program	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Business Name, First Name, Last Name, Address, Phone, Email	No	
SCG	SCG3942 Industrial STAR	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Programs collect customer ID information, i.e. name, account number, phone number, address, email, gas bill		
SCG	SCG3911 Non Residential Incentive Deemed (EERB)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Programs collect customer ID information, i.e. name, account number, phone number, address, email, gas bill		
MCE01	Multifamily Energy Savings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		No	
MCE01c	Multifamily Strategic Energy Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		No	
MCE01d	Residential Efficiency Market	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		No	
MCE02a	Commercial Deemed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		No	
MCE02b	Commercial Custom	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		No	
MCE02c	Commercial Strategic Energy Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		No	
MCE02d	Commercial Efficiency Market	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		No	
MCE02e	Small Business Energy Advantage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		No	
MCE08	Single Family Home Energy Savings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		No	
MCE10a	Industrial Deemed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		No	
MCE10b	Industrial Custom	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		No	
MCE10c	Industrial Strategic Energy Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		No	
MCE11a	Agricultural Deemed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		No	
MCE11b	Agricultural Custom	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		No	
MCE16	Green Workforce Pathways	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		No	
I-REN	CS-001	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Also collect homeowner/renter status		
I-REN	WET-001	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
3C-REN	TCR-Ag-001: Agriculture Technical Assistance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Address, City, County, Zip Code, Full Name, Phone Number	No	
3C-REN	TCR-Com-001: Commercial Marketplace	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Home Address, Zip Code, Full Name, Phone Number, Email, Organization, Profession	No	
3C-REN	TCR-Res-002: Multifamily	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Home Address, City, County, Zip Code, Full Name, Phone Number, Email, Employer, Job Title	No	
CCR REN	Residential Equity Program (CCR-RES-001)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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	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.
BayREN	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.
CCRREN	
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 is 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 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.
BayREN	
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 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.

PA	Response
Question 6:	What should be the timeline for PAs to begin reporting participation by demographic group?
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.
	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
CCRREN	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&Es 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."