

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

Application of Northern California Rural Regional
Energy Network for Approval of 2028-2031
Portfolio Plan and 2032-2035 Business Plan.

A.26-03-xxx

**APPLICATION OF THE REDWOOD COAST ENERGY AUTHORITY ON BEHALF
OF THE NORTHERN CALIFORNIA RURAL REGIONAL ENERGY NETWORK
FOR APPROVAL OF 2028-2031 PORTFOLIO PLAN AND 2032-2035 BUSINESS PLAN**

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For the **REDWOOD COAST ENERGY AUTHORITY**

March 16, 2026

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Pursuant to Rule 2.1 of the California Public Utilities Commission (CPUC or Commission) Rules of Practice and Procedure (Commission Rules) and Decision (D.) 21-05-031, as modified by the December 15, 2025 letter from Commission Executive Director Peterson, the Redwood Coast Energy Authority (RCEA), as the Lead Portfolio Administrator on behalf of the Northern California Rural Regional Energy Network (NREN) submits this Application for Approval of NREN’s 2028-2031 Portfolio Plan and 2032-2035 Business Plan (Application).

I. ABOUT NREN

NREN is the regional energy network (REN) administered by RCEA and located in northern California. NREN’s service territory covers roughly 33,000 square miles of some of the most rural areas in the state. NREN currently serves customers in 17 counties: Alpine, Amador, Butte, Calaveras, El Dorado, Humboldt, Lake, Lassen, Mariposa, Mendocino, Nevada, Placer, Plumas, Sierra, Sutter, Tuolumne, and Yuba. Beginning in 2028, NREN will also provide vital programs and services to rural customers in Trinity and Yolo counties, as well. NREN’s total

service territory includes 37 tribal nations, which is more than a third of the total number of tribes in California. Despite its vast geographic size – roughly 20% of California’s total land area – the estimated 1.6 million customers in this region account for less than 5% of California’s total population. The average population density is 55 people per square mile, compared to California’s average of 253 people per square mile.¹

The geographically remote communities that will be served by NREN have historically low participation in energy efficiency programs. Communities in NREN’s service territory are not only rural, but hard to reach (HTR), traditionally underserved, economically disadvantaged, and isolated, which makes it difficult to provide cost-effective energy efficiency programs. NREN’s overarching intent is to address the unique challenges of rurality, which shape every facet of customer participation, technology adoption, workforce availability, and equitable access to clean energy programs. NREN’s service area faces some of the most extreme rural conditions in California, and these conditions fundamentally shape every aspect of program design, delivery, and equity outcomes. This includes low contractor density, aging housing, heavy reliance on propane and other nonregulated fuels, frequent power outages, and historically low program penetration. These structural conditions are compounded by additional challenges unique to rural buildings and contractors within the region, including reaching areas that are not easily accessible and extended travel times between customers. NREN’s program offerings are intended to address all of these challenges and set the region up for successful implementation of energy efficiency and greenhouse gas reducing programs and strategies. The offerings are intended not only to provide immediate relief, but to also establish a network that can support those efforts and build upon them moving forward.

¹ <https://data.census.gov/profile/California?g=040XX00US06>

NREN's current partners, Lake Area Planning Council (LAPC), Mendocino Council of Governments (MCOG), RCEA, who is also the lead portfolio administrator, and the Sierra Business Council (SBC), facilitate the ability of NREN to reach the greatest number of customers in need throughout the region. Beginning in 2028, County of Yolo will also be an NREN implementer, allowing NREN to further expand its energy efficiency offerings to an even broader population of rural northern California.

II. BACKGROUND

NREN was formally approved by the Commission in Decision D.24-09-031. Prior to establishment of a separate Northern California Rural Regional Energy Network, the Commission had approved establishment of the Rural Regional Energy Network (RuralREN) in D.23-06-055. RuralREN was designed to deliver energy efficiency programs targeted specifically to underserved rural customers throughout central and northern California. The service territory of RuralREN was vast and diverse, even among the targeted rural communities. In D.24-09-031, the Commission approved a split to RuralREN into the Northern California Rural Regional Energy Network and the Central California Rural Regional Energy Network.

As directed by D.24-09-031, on December 23, 2024, RCEA, as the lead portfolio administrator of NREN, filed a Tier 3 Advice Letter submitting a revised Business Plan for the period 2024 through 2027.² The revised Business Plan was approved by the Commission in Resolution E-5400 on August 28, 2025. NREN submits this Business Plan Application consistent with the requirements of D.21-04-031, and the specific direction provided by the Commission's Energy Division.

² D.24-09-031, Ordering Paragraph (OP) 9.

III. OVERVIEW OF NREN’S APPLICATION AND TESTIMONY

A. Executive Summary

NREN’s mission is to offer energy efficiency programs to rural communities, delivering cost savings and strengthening community resilience for the North Coast, Lake County, and Sierra Nevada regions. NREN is committed to empowering communities with tools, knowledge, and support to make informed and cost-effective energy decisions. In this Application, NREN sets forth its plan to offer essential services throughout the region, strengthened by its “By Rural, For Rural” vision. This Application demonstrates how NREN will deepen partnerships with trusted Community Based Organizations (CBOs), tribal governments, local leaders, and municipal agencies, and expand local staffing and in-person engagement to ensure ratepayers can access necessary information and participate in programs through familiar, community-rooted channels.

Building upon the foundation that was the basis for RuralREN, NREN will continue to offer a portfolio of rural-focused energy efficiency programs and measures intended to achieve four key outcomes tied to NREN’s three key themes:

Equity: Ensuring rural, HTR, tribal, and underserved communities receive equitable access to CPUC programs, technical support, and local workforce opportunities.

Outcome 1: HTR, low income, tribal, and underserved rural customers are provided with equitable levels of services and support from CPUC energy programs.

Outcome 2: Equity customers are provided tools to better manage their energy use and costs through increased awareness, technical support resources, and access to a trained, local workforce to improve their homes and businesses.

Energy Savings: Providing measurable, persistent energy and GHG reductions through electrification, energy efficiency, and demand-reduction activities.

Outcome 3: Energy consumption, energy cost and GHG emissions are

reduced across the region, contributing to California's decarbonization and energy efficiency goals.

Access to Funding: Increasing rural communities' ability to secure rebates, incentives, financing, and capital for energy upgrades.

Outcome 4: Increased access to rebates, incentives, and financing to provide the capital needed in rural communities to enable investments in electrification and energy and demand reduction projects with persistent energy savings, GHG emissions reductions, and benefits to the grid.

This Application updates, refines, and expands upon NREN's existing portfolio of energy efficiency programs and offerings across its service area. It is informed by the state's aggressive and laudable clean energy goals, while specifically targeted to ensure that rural Californians are beneficiaries of the state's clean energy transition. It builds upon the successes of the last few years since NREN was approved, as well as those established early on as part of Rural-REN. This Business Plan Application was the product of extensive outreach by NREN and its partner organizations, and is informed by the feedback provided by residents, businesses, and local governments throughout its service territory. It provides a detailed, comprehensive strategy for ensuring that vitally important energy efficiency education, services, and programs are made available to some of California's hardest to reach customers.

Furthermore, the Business Plan Application is guided by the goals and objectives articulated in the Commission's Environmental and Social Justice (ESJ) Action Plan.³ For example, rural and disadvantaged communities face disproportionate administrative burdens that often limit their ability to participate in energy efficiency programs. NREN's offerings integrate equity and access across all portfolio segments by implementing the Equity

³ Environmental & Social Justice Action Plan, 2.0, dated April 7, 2022; <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/news-office/key-issues/esj/esj-action-plan-v2jw.pdf>.

Advisory Committee’s guidance for streamlined eligibility to mitigate this burden. The Application also details NREN’s targeted investment directly in rural and equity communities throughout each of its programs. Facilitating transition away from fossil-fuel energy sources leads to decreased greenhouse emissions overall, but also provides direct air quality and public health benefits in the region. NREN’s program offerings are targeted at ensuring the customers throughout its region, many of which have been unable to access other energy efficiency programs or reap the benefits of those offerings, have programs available to them.

B. Overview of Sectors Served

NREN’s current and proposed program offerings include a suite of measures that cover the Residential, Commercial, Public, Workforce, Education, and Training (WE&T), and Finance sectors.

1. Residential Sector: NREN’s residential strategy will focus on serving rural single-family and manufactured-home customers through its Home Energy Advisors and Home Energy Upgrades programs. These programs are designed to meet customers where they are and target equity⁴ households, whether they are renters or homeowners. By pairing simplified eligibility with deep technical assistance, NREN ensures rural and underserved households can participate in and benefit from home upgrades that improve comfort, reduce energy burden, prepare homes for electrification, and create persistent greenhouse gas (GHG) and total system benefit (TSB)-aligned savings.

2. Commercial Sector: NREN’s commercial strategy targets small businesses, tribal enterprises, and nonprofit and CBO facilities through its Non-Residential Energy

⁴ Definition adopted in D.23-06-055 COLs 31-32

Services program. These facilities have historically been underserved by investor-owned utility (IOU) and statewide programs. Through region-specific outreach, direct install offerings, and electrification incentives, NREN helps commercial customers overcome barriers such as limited capital and lack of access to contractors.

3. NREN's Public Sector: NREN's public sector strategy expands energy efficiency and decarbonization services to rural public agencies, including counties, cities, and tribal governments through its Public Energy Services program. Public facilities often lack the staff capacity and technical expertise needed to identify, fund, and implement energy efficiency projects. NREN will fill this gap through services that help rural public agencies modernize aging buildings, improve resilience, lower operational costs, and adopt technologies that support statewide decarbonization.

4. NREN's Workforce, Education, and Training (WE&T) Sector: NREN's WE&T strategy is designed to build a sustainable, locally rooted clean energy workforce capable of delivering electrification, weatherization, and energy efficiency upgrades across all sectors. NREN's Energy Career Education and Training program integrates activities from its former Codes and Standards program with this WE&T program to ensure that building officials, contractors, and designers are equipped to implement and enforce energy code requirements.

5. NREN's Finance Sector: NREN's cross cutting Energy Upgrade Financing program expands access to capital, which is one of the most persistent barriers to rural energy efficiency and electrification by providing access to and technical assistance for loans, incentive stacking guidance, and loan concierge services for residential, commercial, and public customers. By helping customers finance electrification, building

envelope improvement, and resilience upgrades, the Energy Upgrade Financing program ensures that rural ratepayers can complete projects that generate meaningful energy savings, GHG reductions, and improved comfort, regardless of income level or access to traditional financing.

C. NREN Exh. 1: 2028-2031 Portfolio Plan and 2032-2035 Business Plan

Exhibit 1 contains NREN’s 2028-2031 Portfolio Plan and 2032-2035 Business Plan. It is submitted consistent with the “EE Business Plan Application Template” provided by the Energy Division. It includes 10 Chapters covering the following:

Chapter 1: Executive Summary

Chapter 2: Portfolio Summary

Chapter 3: Portfolio Strategies

Chapter 4: Forecast Methodology and Zero-Based Budgeting

Chapter 5: Portfolio Management

Chapter 6: Segmentation and Sector Strategy

Chapter 7: Portfolio Coordination

Chapter 8: Stakeholder Engagement

Chapter 9: Evaluation, Measurement & Verification

Chapter 11: Recommendations for New or Modified EE Policy

The Business Plan also sets forth the budget for the program period, broken down by expenditures in each program segment. Tables1 below summarizes the 2032-2035 forecast.

Table 1: 4-year Portfolio Budget Forecast Summary (2032-2035)

4-year Portfolio Budget Forecast Summary (2032-2035) (\$000)					
	2032	2033	2034	2035	Total (4-year)
Total Budget	\$29,471	\$30,945	\$32,492	\$34,117	\$127,024
Resource Acquisition Segment Budget	\$0	\$0	\$0	\$0	\$0
Market Support Segment Budget	\$3,157	\$3,315	\$3,480	\$3,480	\$13,433
Equity Segment Budget	\$25,135	\$26,392	\$27,712	\$29,097	\$118,673
Codes and Standards Budget	\$0	\$0	\$0	\$0	\$0
EM&V	\$1,179	\$1,238	\$1,300	\$1,365	\$5,081
ED Portfolio Oversight	\$0	\$0	\$0	\$0	\$0

D. NREN Exh. 2: Program Cards

The Program Cards provide the sector challenges and opportunities, program description, equity concerns and solutions, cost-effectiveness metrics where applicable, program budget, program delivery, and near- and long-term outputs of programs for each program in NREN’s portfolio.

E. NREN Exh. 3: CEDARS Filing Links and Receipts

The California Energy Data and Reporting System (CEDARS) Filing Links and Receipts confirming NREN’s budget filing upload to CEDARS.

IV. RECOMMENDATIONS FOR NEW OR MODIFIED POLICIES

A fundamental premise underlying NREN’s portfolio offerings is the ability to provide the suite of energy efficiency benefits to the hard-to-reach customers throughout its service territory. As the Commission recognized when it approved Rural-REN in D.23-06-055, rural RENs are “strategically designed to serve areas that have been traditionally underserved due to

their rural nature and other structural barriers, such as socioeconomic factors and the high cost of providing services in rural areas. Many regions within the [Rural]-REN area have among the lowest participation rates in energy efficiency programs in the state. As pointed out by the RCEA motion, communities and customers in the R-REN geographic areas have received fewer economic benefits from energy efficiency programs than their counterparts in urban areas.”⁵

NREN Exh. 1, Chapter 11 sets forth recommended policy changes that the Commission should adopt and implement to help overcome these barriers and to facilitate meeting the stated objectives of the energy efficiency program. NREN provides a summary of the requested relief below.

A. Allow Fuel Switching in Energy Efficiency Programs

Policy Recommendation:

NREN respectfully recommends that the Commission modify existing Energy Efficiency (EE) policy to expressly permit fuel switching from unregulated fuels (including propane, butane, and fuel oil) to regulated electric service where such switching is cost-effective, reduces greenhouse gas (GHG) emissions, and advances equity and affordability objectives.

NREN’s service territory includes a disproportionately high percentage of customers who rely on unregulated fuels—primarily propane—for space heating, water heating, and cooking. They also utilize these gas, propane, or wood-burning appliances as backup systems due to frequent unplanned outages caused by wildfire-related Public Safety Power Shutoff (PSPS) events and storm outages. These realities place rural customers at a disadvantage under standard energy efficiency and decarbonization frameworks that assume stable grid conditions, reasonable contractor access and travel times, and accessible program marketing

⁵ D.23-06-005, p. 23-24 (footnote omitted).

channels. In order to mitigate the adverse impacts on the significant segment of NREN's eligible customer base that is effectively precluded from participating in electrification-focused energy efficiency programs under current policy constraints, NREN is asking the Commission to refine its policies to allow fuel switching eligibility in energy efficiency programs. The proposed policy change addresses a fundamental inequity in the program's current rules. Without this change, customers using propane or other unregulated fuels are generally ineligible for incentives when replacing those systems with electric alternatives, whereas customers switching from regulated natural gas to electricity may qualify. Despite the fact that both customers are reducing total statewide GHG emissions, advancing policies for electrification, and contributing to improved air quality in their own regions, only the customers switching from natural gas is eligible for program incentives. This distinction creates an unintended and inequitable barrier for rural households, and is particularly consequential for NREN's HTR customers.

Allowing fuel switching from propane to high-efficiency electric technologies would not only provide measurable GHG reductions, improve indoor air quality, and reduce long-term household energy burdens when paired with appropriate rate design and incentives, but also ensures equitable treatment of similarly situated customers. Authorizing fuel switching for customers using unregulated fuels would expand equitable access to energy efficiency funding, better align programs with state decarbonization goals, and eliminate a structural disparity affecting rural Californians.

Despite the fact that the Commission recognized the need to address fuel switching in 2019, it has not taken affirmative actions to make the rule change since that time. However, in the R.25-04-010 Scoping Memo, then President Reynolds specifically stated that there is an

expectation that “the Commission will evaluate whether energy efficiency funding should be available to encourage fuel switching (from unregulated fuels to regulated ones), in addition to fuel substitution (of one regulated fuel for another).” NREN urges the Commission to hasten that evaluation and find that allowing fuel switching eligibility for energy efficiency funding is in the public interest and modify the program rules accordingly as soon as possible. By making this change, the Commission can rectify the program shortcoming that creates a disparate outcome: rural propane customers, who often face higher energy burdens, are excluded from the very electrification incentives targeted to help them and designed to reduce emissions and long-term energy costs. The current rules are inconsistent with the Commission’s equity directives, the State’s climate mandates, and the objective of advancing affordability.

Given the Commission’s prior acknowledgment of the importance of fuel switching policy, and the clear record demonstrating the need to adjust the rules, NREN respectfully recommends that the Commission adopt explicit guidance allowing energy efficiency incentives for cost-effective fuel switching from unregulated fuels to regulated electric service. Such action would do all of the following:

- Eliminate inequitable treatment of rural and propane-dependent households;
- Advance GHG reduction and building decarbonization objectives;
- Support long-term energy affordability by enabling high-efficiency electric technologies;
- Provide clear implementation guidance to Program Administrators and RENs.

B. Address Equity Gaps in Deemed Measures

Policy Recommendation:

NREN respectfully recommends that the Commission modify the deemed measure framework to do all of the following:

- Permit RENs to use expired or prior versions of deemed measure packages for equity-focused programs where appropriate;
- Direct prioritization of measure development that incorporates equity, fuel substitution, and non-energy benefits (“NEBs”) alongside cost-effectiveness;
- Ensure that the DEER update process evaluates equity and decarbonization impacts before measures are expired or discontinued.

The California Electronic Technical Reference Manual (eTRM) contains approximately 180 deemed measures, developed and updated by Lead Program Administrators (Lead PAs), and approved by the Commission. Approved measure packages form the basis for reporting installations through the California Energy Data and Reporting System (CEDARS) and are used to substantiate monthly, quarterly, and annual portfolio performance reports to the Commission.

Measures periodically expire or are not renewed when they no longer meet IOUs cost-effectiveness thresholds or portfolio optimization criteria without regard for how they may impact other programs. As IOU portfolios are subject to strict cost-effectiveness requirements, measure development and renewal decisions are primarily driven by total resource cost performance and portfolio savings maximization. Because REN are not subject to the same portfolio-level cost-effectiveness requirements (as the Commission has recognized that it is “likely inherently more costly (and therefore less cost-effective) to serve the [rural REN] population”),⁶ RENs are instead evaluated on broader statutory and Commission-directed objectives, including equity advancement, non-energy benefits, market transformation, and fuel

⁶ D.23-06-055, p. 24.

substitution, many RENs equity-focused programs would materially benefit from the ability to use expired or prior versions of measure packages where such measures remain technically valid and aligned with community needs.

In addition, the Commission should prioritize development of new or revised measure packages that optimize not only energy savings and cost-effectiveness, but also fuel substitution impacts, health and safety improvements, and other equity indicators. Currently, CEDARS reporting captures only deemed savings metrics tied to active measure packages. As a result, important equity achievements, particularly in disadvantaged communities (DACs), HTR, underserved, low-income households, and rural territories, are not fully reflected in claims reporting, and some participant groups remain unserved when measures they need are no longer available within the deemed framework.

While certain equity-oriented measures may not yield the highest deemed savings values or meet strict cost-effectiveness prioritization criteria, they remain aligned with Commission directives related to equity, decarbonization, and market support in underserved communities. Before measures are expired, deprioritized, or materially modified, their value should be evaluated not only on energy savings metrics, but also on their contribution to fuel substitution, electrification pathways, NEBs, and service to DACs, rural, and environmental justice communities.

NREN recommends that the Commission direct staff and Lead PAs to incorporate this equity-focused review into the next Database for Energy Efficiency Resources (DEER) update cycle (DEER2028, E-5152), including explicit consideration of equity and fuel substitution impacts when measures are updated or proposed for expiration. Addressing these equity gaps is increasingly urgent as the Commission advances efforts to track and potentially incorporate

net energy benefits and other equity indicators into portfolio performance metrics and goal-setting. Without structural adjustments, the deemed framework may unintentionally undermine the Commission’s evolving equity objectives.⁷

C. Allow Rebates Higher Than Incremental Costs Gaps

Policy Recommendation:

Allow greater allowance of the limited instances where cash rebates to customers may exceed the measure installation cost for programs that target HTR participants.

NREN is finding programs designed for HTR participation require higher incentives to overcome market barriers across many implemented energy efficiency measures. Rebating only the cost to get higher efficiency equipment above code is not the reality of many HTR participants, as they typically have equipment below current code and the full cost to complete the work is higher than only incremental costs. While there is discretion for approval “when rebates are expected to be higher than the incremental measure costs,”⁸ exceptions have only been allowed on a per measure basis to-date for fuel substitution programs.⁹ NREN proposes approval of a more overarching exception for programs that target HTR participants as this would reduce administrative burden and allow for increased program participation and increased program results.

D. Revise the Equity Definition

Policy Recommendation:

Update the Commission’s definition of equity customers to include individuals with Access and Functional Needs (AFN), communities impacted by climate-related natural disasters, and counties included in metropolitan statistical areas that meet the underserved definition.

⁷ D.23-06-055 Ordering Paragraph 19.

⁸ D.06-06-063, Energy Efficiency Policy Manual, version 6, p. 26.

⁹ Revised CPUC Guidance Requiring an Addendum to Measure Package Documenting Rebate Greater than Incremental Measure Cost, dated May 16, 2024.

The Commission has long articulated the need to prioritize and target programs to underserved communities, serving ratepayers that are HTR and are underserved by its energy efficiency and other equity programs. The current HTR definition, however, excludes large swaths of populations that face significant barriers to program participation, including but not limited to individuals with Access and Functional Needs (AFN), communities impacted by climate-related natural disasters, and counties included in metropolitan statistical areas that meet the underserved definition.

Consistent with the underlying purposes of defining an equity segment, and the furtherance of the objectives of the ESJ Action Plan, NREN recommends that the Commission expand the definition of the equity segment based on the principles set forth in D.23-06-055,¹⁰ and include underserved customers as defined Public Utilities Code Section 1601(e). Further, to capture HTR and underserved communities located within high-population counties, NREN recommends using the underserved geography in addition to the HTR geographic definition. Expanding the definition to also include add AFN to the HTR definition would break down an existing regulatory silo and would likely result in more targeted programming to this population who fall within the primary purpose of equity segment programs.

Finally, despite best efforts to build resilient communities and statewide progress towards meeting climate goals, there are communities across the state – especially those in remote areas – that are already contending with the impacts of climate-driven disasters. Consideration should be given to adding communities that are impacted by natural disasters to the geographic definition for HTR. Increased natural disasters, such as wildfires, severe storms,

¹⁰ D.23-06-055, pp 45-48.

and coastal flooding, are some of the most visible catastrophic results of the climate crisis caused by our reliance on fossil fuels. Entire communities can be devastated for years or generations. Just as negative impacts to communities experiencing poor air quality from local emissions need to be addressed through ESJ and equity considerations, so do communities already experiencing negative impacts from global GHG emissions.

E. REN Total Benefit Metric

Policy Recommendation:

Initiate a process to vet SoCalREN’s development of an accountability framework that utilizes a non-energy benefits calculator to establish a standardized metric for setting annual portfolio goals and tracking REN performance for adoption into energy efficiency program rules.

While the current TSB metric captures essential grid impacts, it does not account for the extensive participant, partner, and community benefits that are central to the mission of the RENs as well as alignment with CPUC Equity mandates. To ensure a comprehensive evaluation of portfolio performance, SoCalREN has developed a *proposed* specialized benefits calculator (REN Benefits Calculator Tool) to output a REN Total Benefit (RTB) metric providing a more comprehensive picture of ratepayer value. NREN recommends that the Commission direct SoCalREN to initiate a stakeholder working group for feedback. NREN requests that the Commission include other RENs in the testing and development process for this calculator.

F. Funding Cliff

Policy Recommendation:

The Commission should utilize a Year 4 funding level at the conclusion of the program cycle and beginning of the new program cycle to allow for adequate funding in the event of a delay in approvals for 2028-2035 applications. An average of the 2024-2027 four-year funding cycle would not be adequate as ramp up was included in NREN’s funding to account for the timing of NREN program launches. The beginning years of NREN’s program cycle, when

averaged across the four-year period, do not reflect a feasible amount to be used for continued funding in 2028 and beyond, and instead, NREN's Year 4 budget should be used.

Extending the timing of the Business Plan Application approval further into 2027 than previously anticipated would result in a funding decrease for NREN if the current guidance from D.21-05-031 is applied. The Commission has clearly recognized that “[f]unding cliffs created by regulatory delays are detrimental to the energy efficiency market and can potentially thwart long-term gains in energy efficiency.”¹¹ For that reason, the Commission adopted an approach to avoid those cliffs in D.21-05-031, in which PAs may “continue budgets at the four-year average from the previous approved four-year energy efficiency portfolio, until such time as the Commission approves a new portfolio and budgets.”¹² The Commission's recognition of the detrimental effects of funding cliffs and the idea of providing guidance to avoid funding cliffs is very important and appreciated. However, NREN has a unique situation with regard to its current four-year portfolio funding. Notably, the division of Rural-REN in 2024 modified the overall program budget approved for Rural REN in D.23-06-055. As a result, NREN's approved funding did not cover four full years, and therefore, NREN respectfully requests that the CPUC provide updated guidance for recently approved RENs in order to prevent funding drop offs.

IV. COMPLIANCE WITH COMMISSION RULES

A. Statutory Authority

NREN files this Application pursuant to Public Utilities Code Sections 451,454, 728,

¹¹ D.21-05-031 Finding of Fact 13.

¹² Ibid., Conclusion of Law 23.

729, 740.4, and 795, the Commission’s Rule of Practice and Procedure (Rules), D.21-09-037, D.21-05-031, D.18-05-041, D. 16-08-19, D.18-01-004, D.19-08-009, orders, and resolutions of the Commission.

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

Redwood Coast Energy Authority
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 Eureka, CA 95501
 Northern California Rural Regional Energy Network (NREN)

C. Contact Information – Rule 2.1(b)

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D. Proposed Category – Rule 2.1(c)

NREN proposes to characterize this Application as “rate setting” as defined in the Commissions Rule 1.3(f) and Public Utilities Code §1701.1(c)(3).

E. Need for Evidentiary Hearings – Rule 2.1(c)

NREN has endeavored to provide detailed information and testimony to support the Application, and does not think that evidentiary hearings are needed for the Commission to make finding that the Application is in the public interest and should be granted.

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

NREN asks that the Commission consider all of the following:

1. Whether NREN’s 2028-2031 Portfolio Plan and 2032-2035 Business Plan is reasonable.

2. Whether NREN’s 2028-2031 Portfolio Plan and 2032-2035 Business Plan complies with the terms of D.21-05-031 and the direction provided by Energy Division.
3. Whether the proposed goals, estimated budget, and metrics are reasonable.
4. Whether NREN’s recommendations for new or modified policies should be adopted and implemented.

G. Proposed Schedule – Rule 2.1(c)

In order to ensure that the timely review and approval of the Application, NREN proposes the following schedule for resolution of this Application:

Activity	Proposed Schedule
Application Due Date	March 16, 2026
ALJ Ruling Consolidation Proceeding and Setting Dates for Protests and Replies	March 31, 2026
Protests Due	April 21, 2026
Reply to Protests	May 1, 2026
Joint Prehearing Conference Statement	May 20, 2026
Prehearing Conference	May 27, 2026
Scoping Memo Setting Schedule and Soliciting Policy Recommendation and Comments	June 10, 2026
Intervenor Policy Recommendations	July 15, 2026
Opening Comments on PA and Intervenor Policy Recommendations	July 29, 2026
Reply Comments on Policy Recommendations	August 12, 2026
Second Scoping Memo (Determining Whether Policy Recommendations Are in Scope)	September 16, 2026
Intervenor Direct Testimony on Programs and Budgets	September 30, 2026
Rebuttal Testimony on Programs and Budgets	October 21, 2026
Opening Briefs	November 18, 2026
Reply Briefs (Matter Submitted)	December 16, 2026

Proposed Decision	February 2027
Final Decision	March 2027

H. Notice and Service of Application

A copy of the Application and Notice of Availability of supporting testimony are being served on the parties of record in R.13-11-005, R.25-04-010 and A.22-02-005, *et al.*, and Chief Administrative Law Judge Michelle Cooke.

I. Authority to Conduct Business – Rule 2.2

The Redwood Coast Energy Authority was formed in 2003 by the County of Humboldt and the Cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell, and Trinidad, and the special district of the Humboldt Bay Municipal Water District, by a Joint Powers Agreement dated April 22, 2003. An Amended and Restated Joint Powers Agreement of the Redwood Coast Energy Authority was entered into on December 15, 2015, to implement and administer a common Community Choice Aggregation program pursuant to California Public Utilities Code Sections 331.1 and 366.2 an electric service enterprise which shall be available to those Member cities and the Counties that elect to become program participants.

V. RELIEF REQUESTED

NREN has put forth a comprehensive Business Plan and supporting documentation that meets all of the regulatory requirements. NREN’s portfolio and budget proposals are reasonable and should be adopted by the Commission. The programs and offerings proposed therein do not duplicate other energy efficiency offerings and help to ensure equitable access to important services for rural and hard to reach customers throughout NREN’s vast service territory. NREN requests that the Commission approve the Application and grants the following requested relief:

1. Find that NREN's 2028-2031 Portfolio Plan and 2032-2035 Business Plan is reasonable.
2. Find that NREN's 2028-2031 Portfolio Plan and 2032-2035 Business Plan complies with the terms of D.21-05-031 and the direction provided by Energy Division.
3. Find that the proposed goals, estimated budget, and metrics are reasonable.
4. Find that NREN's recommendations for new or modified policies should be adopted and implemented.

VI. CONCLUSION

NREN appreciates the Commission's consideration of NREN's Application in its entirety and respectfully requests that the Commission approve the Application consistent with the schedule proposed herein.

March 16, 2026

Respectfully submitted,



C. Susie Berlin

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For the Redwood Coast Energy Authority

APPENDIX A

Verification

I am the Portfolio Lead of the Northern California Rural Regional Energy Network and the Senior Portfolio Manager of the Redwood Coast Energy Authority and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

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

Executed on March 13, 2026, at Eureka, California.

Respectfully submitted,

/s/ Patricia Terry

Patricia Terry

Senior Portfolio Manager

Redwood Coast Energy Authority on behalf of NREN

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Lead Portfolio Administrator for

Northern California Rural Regional Energy

Network (NREN) ID #U-1401-E

Proceeding: A.26-03-XXX

Exhibit No.: NREN-01

Date: March 16, 2026

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

NREN

2028-2031 PORTFOLIO PLAN AND 2032-2035 BUSINESS PLAN



Northern Rural Energy Network

YOUR LOCAL ENERGY SOLUTIONS

California Public Utilities Commission

Energy Division Tariff Unit

505 Van Ness Ave

Fourth Floor

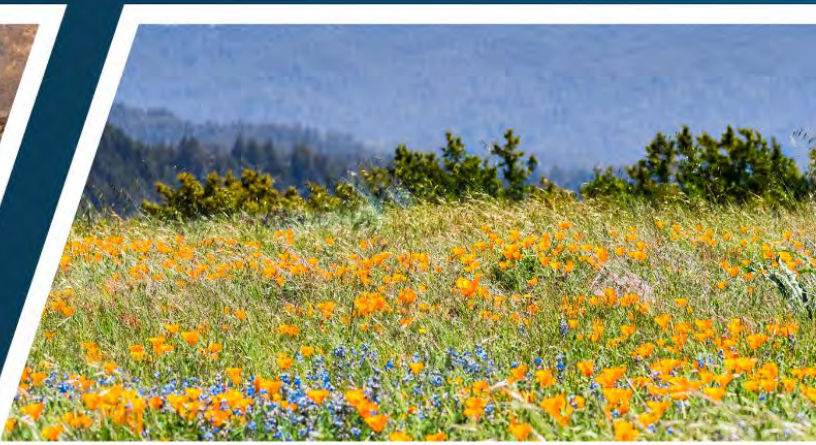
San Francisco, CA 94102-3298

March 16, 2026



**Northern Rural
Energy Network**

Energy Efficiency Portfolio Application



2028–2035

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

Business Plan

List of Abbreviations

Abbreviation	Definition
AFN	Access and Functional Needs
BayREN	Bay Area Regional Energy Network
BLR	Blue Lake Rancheria
BPA	Business Plan Application
C&S	Codes and Standards
CAC	Community Advisory Committee
CAEAFTA	California Alternative Energy and Advanced Transportation Financing Authority
CARE	California Alternate Rates for Energy
CBO	Community Based Organizations
CCA	Community Choice Aggregator
CCRREN	Central California Rural Regional Energy Network
CEC	California Energy Commission
CEDARS	California Energy Data and Reporting System
DAC	Disadvantaged Communities
DACAG	Disadvantaged Communities Advisory Group
DEER	Database for Energy Efficiency Resources
DOE	Department of Energy
DR	Demand Response
E	Equity
EAC	Equity Advisory Committee
EBD	Equitable Building Decarbonization
ECAA	Energy Conservation Assistance Act
ECE&T	Energy Career Education and Training
ED	Energy Division
EE	Energy Efficiency
EIA	Energy Information Administration
EIA	Energy Information Administration
ESA	Energy Savings Assistance
ESA	Energy Savings Assistance
ESJ	Environmental and Social Justice

Abbreviation	Definition
ETA	Elect-to-Administer
eTRM	Electronic Technical Reference Manual
FERA	Family Electric Rate Assistance Program
GGF	GoGreen Financing
GHG	Greenhouse Gas
HES	Home Energy Score
HTR	Hard-To-Reach
IDSM	Integrated Demand Side Management
IOU	Investor-Owned Utilities
JCM	Joint Cooperation Memorandum
JPA	Joint Powers Authority
KPI	Key Performance Indicators
LAPC	Lake Area Planning Council
Low-GWP	Low Global Warming Potential
MCOG	Mendocino Council of Governments
MMIP	Missing and Murdered Indigenous Persons
MS	Market Support
MT	Market Transformation
NEB	Non-Energy Benefits
NMEC	Normalized Metered Energy Consumption
NREN	Northern Rural Energy Network
OBF	On Bill Financing
OP	Ordering Paragraph
PA	Portfolio Administrator
PAC	Program Administrator Cost
PG&E	Pacific Gas and Electric
PSPS	Public Safety Power Shutoff
RA	Resource Acquisition
RCEA	Redwood Coast Energy Authority
RCEW	Redwood Coast Energy Watch
RIM	Ratepayer Impact Measure
RREN	Rural Regional Energy network
RTB	REN Total Benefit
SBC	Sierra Business Council
SCT	Societal Cost Test
SNEW	Sierra Nevada Energy Watch
TRC	Total Resource Cost
TSB	Total System Benefit

Abbreviation	Definition
TSB	Total System Benefit
UVM	Unique Value Metric
VCE	Valley Clean Energy
WE&T	Energy Career Education and Training
YEP	Yolo Energy Partnership

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Chapter 1: Executive Summary

The Northern California Rural Regional Energy Network (also known as the Northern Rural Energy Network or NREN) updates its program portfolio and market sectors through this Business Plan Application (BPA). This BPA will update, refine, and expand NREN’s portfolio of energy efficiency (EE) programs across its service area. NREN’s overarching intent is to address the unique challenges of rurality, which shape every facet of customer participation, technology adoption, workforce availability, and equitable access to clean energy programs.

Rural communities across Northern California experience higher energy burdens¹, more frequent power outages and greater grid unreliability² than higher population communities. They also face limited broadband access and fewer contractors available to provide energy-efficiency services. Lower population density and geographic distance have historically left these communities with gaps in service by Investor-Owned Utility (IOU) energy efficiency programs. It is NREN’s objective to address these gaps. This BPA is informed by robust community engagement, including needs assessments, direct input from local governments, coordination with community-based organizations, and feedback from local individuals. There is a demonstrated need for more accessible, localized, and trusted program delivery in NREN’s region.

NREN’s BPA proposes to strengthen its suite of programs to ensure rural customers receive equitable access to the full range of energy efficiency, electrification, workforce, and financing services authorized under its portfolio framework. This includes planning

¹ Ross, Lauren, et al. The High Cost of Energy in Rural America. July 2018, ACEEE.
<https://www.aceee.org/sites/default/files/publications/researchreports/u1806.pdf>

² PG&E, 2024 Annual Electric Reliability Report,
<https://www.pge.com/assets/pge/docs/about/pge-systems/2024-annual-electric-reliability-report.pdf>

for growth in program reach and goals, as well as planning for the expansion of NREN’s region. The intent behind these updates is grounded in the demonstrated needs of rural communities for these services. The communities NREN serves range from propane-reliant households in remote areas to small businesses and tribal facilities that have never previously been eligible for or served by IOU programs.

A core objective of NREN’s BPA is to increase equitable access to energy efficiency and building decarbonization services for residents who face the greatest participation barriers. To accomplish this, NREN will deepen partnerships with trusted Community Based Organizations (CBOs), tribal governments, local leaders, and municipal agencies, and will expand local staffing and in-person engagement to ensure ratepayers can access necessary information and participate in programs through familiar, community-rooted channels.

NREN’s Residential Sector

NREN’s residential strategy will focus on serving rural single-family and manufactured-home customers through its Home Energy Advisors and Home Energy Upgrades programs. These programs are designed to meet customers where they are and target equity³ households, whether they are renters or homeowners. By pairing simplified eligibility with deep technical assistance, NREN ensures rural and underserved households can participate in and benefit from home upgrades that improve comfort, reduce energy burden, prepare homes for electrification, and create persistent greenhouse gas (GHG) and total system benefit (TSB)-aligned savings.

NREN’s Commercial Sector

NREN’s commercial strategy targets small businesses, tribal enterprises, and nonprofit and CBO facilities through its Non-Residential Energy Services program. These facilities

³ Definition adopted in D.23-06-055 COLs 31-32

have historically been underserved by IOU and statewide programs. Through region-specific outreach, direct install offerings, and electrification incentives, NREN helps commercial customers overcome barriers such as limited capital and lack of access to contractors.

NREN's Public Sector

NREN's public sector strategy expands energy efficiency and decarbonization services to rural public agencies, including counties, cities, and tribal governments through its Public Energy Services program. Public facilities often lack the staff capacity and technical expertise needed to identify, fund, and implement energy efficiency projects. NREN will fill this gap through services that help rural public agencies modernize aging buildings, improve resilience, lower operational costs, and adopt technologies that support statewide decarbonization.

NREN's Workforce, Education, and Training (WE&T) Sector

NREN's WE&T strategy is designed to build a sustainable, locally rooted clean energy workforce capable of delivering electrification, weatherization, and energy efficiency upgrades across all sectors. NREN's Energy Career Education and Training program integrates activities from its former Codes and Standards program with this WE&T program to ensure that building officials, contractors, and designers are equipped to implement and enforce energy code requirements.

NREN's Finance Sector

NREN's cross cutting Energy Upgrade Financing program expands access to capital, which is one of the most persistent barriers to rural energy efficiency and electrification by providing access to and technical assistance for loans, incentive stacking guidance, and loan concierge services for residential, commercial, and public customers. By helping customers finance electrification, building envelope improvement, and resilience upgrades, the Energy Upgrade Financing program ensures that rural ratepayers can

complete projects that generate meaningful energy savings, GHG reductions, and improved comfort, regardless of income level or access to traditional financing.

Regulatory Context of Filing

The Rural Regional Energy Network (Rural REN) was initially established by D.23-06-055 as an equity-focused REN to address the specific needs of rural communities. On May 21, 2024, the Administrative Law Judge filed a Ruling Seeking Comment on Potential Path Forward for Rural Regional Energy Network that proposed dividing RuralREN into two separate entities, one serving the North Coast and Northern Sierra regions, and the other serving the Central Coast and Central Valley areas. This proposal was approved in D.24-09-031, which ordered a modification to the Rural Regional Energy Network approved in D.23-06-055 to two RENs, the Northern California Rural Regional Energy Network (Northern Rural Energy Network or NREN) and the Central California Rural Regional Energy Network (CCRREN).

On December 23, 2024, Redwood Coast Energy Authority, as the lead portfolio administrator of NREN, filed a Tier 3 Advice Letter submitting a revised Business Plan for the period 2024 through 2027 in compliance with D.24-09-031, Ordering Paragraph (OP) 9. The revised Business Plan was approved through Resolution E-5400 adopted on August 28, 2025 (RRN AL #003-E/003-G).

OP 5 of D.21-05-031 guides PAs to submit their four-year portfolio and eight-year business plan application filings on February 15, 2022, and every four years thereafter, making the deadline for this application February 15, 2026. On December 15, 2025, the CPUC Executive Director granted an extension to all PAs until March 16, 2026, to file their applications for the eight-year business plan period and the four-year portfolio period beginning in 2028.

D.23-06-055 directs PAs to include certain efforts in this Business Plan Application. D.23-06-055, OP 2 directs PAs to coordinate and propose a statewide program portfolio assessment process to review and recommend changes to the portfolio of statewide programs. NREN includes the results of the proposed assessment process in this application. D.23-06-055, OP 23 directs PAs to include its preferred approaches to regular reporting of demographic energy efficiency program participation information. NREN includes its preferred approaches Chapter 3, Strategy 10 of this BPA.

The CPUC Environmental & Social Justice (ESJ) Action Plan serves as a commitment to furthering ESJ principles as well as an operating framework to integrate ESJ considerations throughout the agency’s work. One of the action items (Index 1.1.1) from the CPUC’s ESJ Action Plan is to incorporate ESJ into systemic processes such as applications. NREN’s efforts towards ESJ goals are detailed in this application in Chapter 3, Strategy 7. Another action item (Index 2.1.3) calls for continued support and coordination with the Disadvantaged Communities Advisory Group (DACAG). NREN’s efforts align with DACAG and ESJ and are detailed in this application.

The NREN portfolio proposed in this application complies with the criteria for REN activities as most recently updated in D.19-12-021, OP 4, regarding filling gaps, piloting innovative activities, and serving hard-to-reach⁴ (HTR) markets.

Chapter 2: Portfolio Summary

Rural Challenges

NREN’s service area faces some of the most extreme rural conditions in California, and these conditions fundamentally shape every aspect of program design, delivery, and

⁴ D.23-06-055 section 7.3 pp. 52–54

equity outcomes. Unlike urban and suburban regions served by other Portfolio Administrators (PAs), NREN’s territory experiences long travel distances, low contractor density, aging housing, heavy reliance on propane and other nonregulated fuels, frequent power outages, and historically low program penetration. These structural conditions are compounded by additional challenges unique to rural buildings and contractors within the region.

In many rural communities, contractors often lack familiarity with the permitting process and requirements, creating a significant demand for hands-on support. Additionally, rural communities have far fewer tradespeople and are often so remote that contractors are unwilling or unable to serve them. Those that will serve only do so with increased cost and wait times. The lack of local contractors is a barrier that directly undermines the feasibility of heat pump installations, multi-measure retrofits, and weatherization. To address this, NREN will prioritize building a locally rooted clean-energy workforce pipeline. NREN’s programs coordinate with one another to create a demand for energy efficiency measures and training for the workforce to supply that demand, while prioritizing ease of access for smaller, local contractors to participate.

Specific to rural communities, many manufactured homes or residential homes often need significant repair before electrification or weatherization measures can be installed. Very few buildings meet modern code requirements, meaning EE projects are likely to require more staff time and resources to implement, and therefore require higher incentives per project. Many households frequently retain gas, propane, or wood-burning appliances as backup systems due to wildfire-related Public Safety Power Shutoff (PSPS) events and storm outages⁵. These realities place rural customers at a

⁵ TRC, “Propane Utilization in Buildings Across California,” Prepared for the California Air Resource Board, December 12, 2025, <https://ww2.arb.ca.gov/sites/default/files/2026-01/Research%20Contract%2023STC009%20Final%20Report.pdf>

disadvantage under standard EE and decarbonization frameworks that assume stable grid conditions, reasonable contractor access and travel times, and accessible program marketing channels. While these challenges do pose a significant barrier to rural communities, it also presents an opportunity for these buildings to benefit from EE upgrades.

To address these challenges, NREN’s portfolio is designed with a delivery structure that begins with equity focused, community-trusted outreach, and extends throughout all NREN’s offerings. NREN’s programs will provide highly personalized support, including bill analysis, contractor navigation, electrification readiness assessments, and Integrated Demand Side Management (IDSMS) linkages for solar, storage, and Demand Response (DR) programs. These local, relationship-driven services are essential in rural communities where broadband gaps, linguistic diversity, mistrust of unfamiliar entities, and limited technical understanding can inhibit participation. NREN also incorporates “exempt measures”⁶ such as weatherization and envelope upgrades, to serve customers who cannot electrify due to resilience concerns, technical feasibility limitations, or financial barriers. These measures will reduce therm usage, lower bills, increase comfort, and prepare homes for future electrification.

Rural customers also face disproportionate financial barriers, with many households earning just above the low-income threshold⁷ to qualify for programs but still cannot afford energy efficiency upgrades on their own without assistance. NREN will work to

⁶ “Exempt measures, for purposes of this policy, would be defined as measures that result in gas savings, but do not burn gas. Examples of these measures include, but are not limited to, building insulation, sealing, smart thermostats, faucet aerators, and building envelope measures such as windows.” Energy Division, CPUC, EE Natural Gas Incentive Phase Out Staff Proposal, <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/energy-efficiency/rolling-portfolio-program-guidance/ng-staff-prop-81622.pdf>

⁷ Ross, Lauren, et al. The High Cost of Energy in Rural America. ACEEE, <https://www.aceee.org/sites/default/files/publications/researchreports/u1806.pdf>

narrow this gap through incentives as well as technical and financing support for both NREN and non-NREN programs to ensure that rural ratepayers are not blocked from participating in decarbonization simply because they lack upfront capital.

Overall, NREN’s portfolio meets its overarching goals of: Equity, Energy Savings, and Access to Capital. NREN’s upcoming portfolio addresses the structural inequities created by rurality by designing a portfolio centered on trust, accessibility, resilience, local workforce capacity, and financial inclusion. Through these targeted strategies, NREN will ensure that rural communities receive equitable, effective, and sustained support from energy efficiency programs.

Service territory and service territory-related factors

NREN will serve a territory that spans 19 northern California counties: Alpine, Amador, Butte, Calaveras, El Dorado, Humboldt, Lake, Lassen, Mariposa, Mendocino, Nevada, Placer, Plumas, Sierra, Sutter, Trinity, Tuolumne, Yolo, and Yuba. These areas include 37 tribal nations⁸, over a third of the total number in California. This rural region covers over 33 thousand square miles, roughly 20% of California’s total land area, with an estimated customer count of around 1.6 million, less than 5% of California’s total population. The average population density is 55 people per square mile, compared to California’s average of 253⁹.

This vast region is highly impacted by the effects of climate change as evidenced by more frequent instances of wildfires, flooding, and more damaging storms.¹⁰ These

⁸ <https://www.ncidc.org/county-list-tribal-nations-california>

⁹ <https://data.census.gov/profile/California?g=040XX00US06>

¹⁰ California’s fourth climate change assessment regional reports – North Coast and Sierra Nevada, https://www.energy.ca.gov/sites/default/files/2019-11/Reg_Report-SUM-CCCA4-2018-001_NorthCoast_ADA.pdf, https://www.energy.ca.gov/sites/default/files/2019-11/Reg_Report-SUM-CCCA4-2018-004_SierraNevada_ADA.pdf

natural disasters often lead to power outages from PSPS events, fast trip emergency closures, or damage to electrical and natural gas infrastructure that can take longer to repair due to the remoteness of its regions. The grid in Northern California also has some of the most unreliable circuits in Pacific Gas & Electric (PG&E) territory. PG&E identified 32 of its worst-performing circuits based on how often and how long customers lose power, using outage data from 2022–2024. These circuits represent about 1% of PG&E’s system; 15 of them are located within NREN service territory. Figure 1 below shows the distribution of PG&E’s worst performing circuits across NREN service territory.

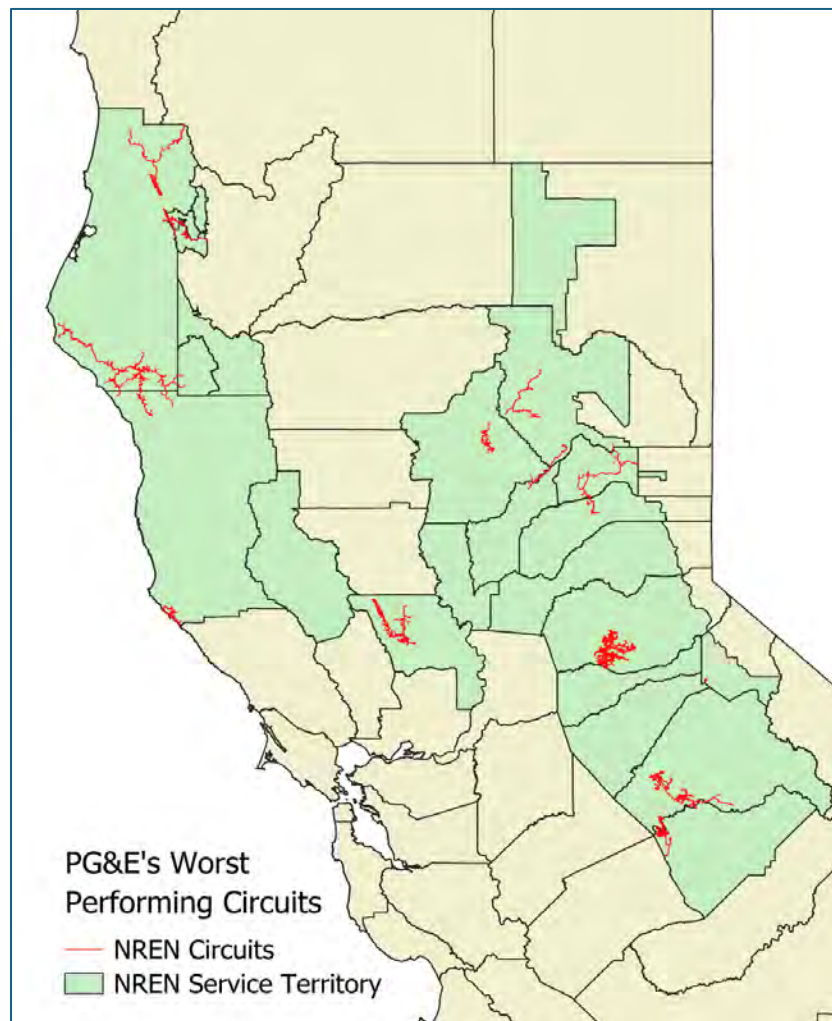


Figure 0-1: Worst performing PG&E circuits in NREN service territory

Additionally, these geographically remote communities have historically low participation in energy efficiency programs.¹¹ Communities in NREN’s service territory are not only rural, but hard to reach, traditionally underserved, economically disadvantaged, and isolated, which makes it difficult to provide energy cost-effective efficiency programs. Energy efficiency programs designed with strict cost effectiveness requirements cannot adequately serve the hardest to reach customers that often also have the greatest need for the efficiency upgrades and other program offerings. Traditionally, third-party implementers are motivated to focus their efforts on more metropolitan regions that can be served more cost effectively.

Many rural communities lie at the end of unreliable transmission lines or where no infrastructure exists. These customers are dependent on delivered fuels such as propane, kerosene, and cordwood, for heating. Homes and commercial buildings throughout the region are older than state averages and often need costly electrical upgrades to accommodate new energy efficient equipment, while incomes are lower and access to capital is limited. Recent federal cuts to tax credits and Department of Energy (DOE) programs for energy efficiency, decarbonization, and weatherization have limited funding opportunities. At the same time, local jurisdictional governments are understaffed and underfunded, and anti-climate-action political stances are commonplace.

Despite these challenges, NREN is particularly well-situated to deliver energy efficiency services to rural Californians. RENs offer an opportunity to regionalize and localize program design and associated delivery while maintaining the economy of scale necessary to maximize the cost-effective delivery of resources. Regional and local

¹¹ MacDonald, S., Winner, B., Smith, L. *et al.* Bridging the rural efficiency gap: expanding access to energy efficiency upgrades in remote and high energy cost communities. *Energy Efficiency* **13**, 503–521 (2020). <https://doi.org/10.1007/s12053-019-09798-8>

program designs that integrate various locational variables are critical to successful rural implementation.

NREN Partners

The NREN partners who guide and implement programs in their service regions include:



Lake Area Planning Council (LAPC) is a California Joint Powers Authority (JPA) with member agencies consisting of the Cities of Lakeport and Clearlake and the County of Lake. LAPC is the Regional Transportation Planning Agency created with authority to plan for and suggest solutions to common problems, assist in the preparation of proposals by utilizing planning talents and general plans of the various governmental agencies located within the county, and of planning and technical experts in various other fields. As of 2024, LAPC also serves as an NREN Governing Partner and implementer of NREN programs, primarily leading the Public Energy Services program. Lake County is a growing rural area with a struggling economy dependent on agriculture, tourism, and the geothermal power industry. Although many utility service territory maps do not accurately show this, Lake County does not have access to natural gas, and many customers have to rely on propane for heating and cooking.¹² With the launch of NREN programs in the region, LAPC has shepherded in the delivery of energy

¹² [https://data.census.gov/table?q=median+house&g=050XX00US06033\\$1400000](https://data.census.gov/table?q=median+house&g=050XX00US06033$1400000)

efficiency services through both NREN and IOU statewide programs to a region largely unaware and unserved in past years.

Mendocino Council of Governments (MCOG) is a California JPA formed in 1972 with member agencies consisting of the Cities of Fort Bragg, Point Arena, Ukiah and Willits, and the County of Mendocino. MCOG’s purpose is to assist local governments in planning to address common needs, cooperating for mutual benefit, and coordinating for sound regional, community, and intercommunity development. MCOG is the Regional Transportation Planning Agency for the Mendocino County region. In 2024, MCOG also became an NREN Governing Partner and implementer. Mendocino County’s access to energy efficiency services increased with MCOG’s implementation of NREN programs. MCOG also coordinates with Sonoma Clean Power, the regional CCA where services can be aligned, as well as the City of Ukiah’s Electric Department that provides electricity to the City of Ukiah, Mendocino’s largest city. MCOG has taken the lead on the Energy Career Education and Training program, bringing training to the NREN area for contractors, and leveraging connections with local colleges.

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

commercial sector as an elect-to-administer (ETA) program administrator, while continuing its Local Government Partnership program with PG&E, various grant-funded programs, and other programs self-funded through its CCA. RCEA is an NREN Governing Partner, implementing NREN direct install programs, providing service delivery in Humboldt and Trinity County, and also serves as the Lead Portfolio Administrator for NREN.

Unlike the majority of the state, other than some of the sparsely populated inland areas, there is little cooling load in and the region experiences winter peaks as opposed to the summer peaks.¹³As a result, many statewide programs do not fit the needs of Humboldt County customers. Regional and local program designs that integrate various locational variables are critical to successful rural implementation.

Sierra Business Council (SBC) is a 501(c)(3) non-profit organization whose purpose is to pioneer and demonstrate innovative approaches and solutions to increase community vitality, economic prosperity, environmental quality, and social fairness in the Sierra Nevada. Since the early 2000's, SBC has served as an experienced energy efficiency program implementer, working with PG&E implementing the Sierra Nevada Energy Watch. SBC has also participated in CPUC proceedings bringing a rural equity point of view to the public process.

The region served by SBC is large, ecologically diverse, rural, and faces both challenges and opportunities, proving its resilience in the face of both environmental and economic challenges. Local businesses depend on sustainable tourism, outdoor recreation, forest and stream restoration, land management, and conservation. Challenges that impact

¹³Pacific Energy Center's Guide to California Climate Zones
https://bravenewclimate.com/files/includes/docs/pdfs/about/edusafety/training/pec/toolbox/arch/climate/california_climate_zones_01-16.pdf

both the land and the communities include the increased severity of wildfires¹⁴ and other symptoms of climate change, planned power shutoffs, impacts associated with National Forest closures, an escalating need for affordable housing, and a lack of equitable access to reliable internet.¹⁵ SBC is uniquely positioned to serve this region, seeing opportunity in challenges and changes. SBC is a NREN Governing Partner, serving as the lead implementer for the Energy Upgrade Financing and Home Energy Advisors programs, and providing service delivery to 14 Sierra Nevada counties through locally based staff and CBO partnerships.

County of Yolo: Starting in 2028, NREN is proud to partner with County of Yolo’s Sustainability Division, as an implementer to deliver services in Yolo County. Yolo County plays a central role in advancing local climate, energy, and resilience initiatives through policy leadership and program implementation guided by its Climate Action and Adaptation Plan. Through the Yolo Energy Partnership (YEP), Yolo County has built a collaborative framework that coordinates energy efficiency, electrification, and resilience programs across rural communities, leveraging trusted relations with CBOs to reach underserved residents. Yolo County includes a mix of agricultural communities and small cities that face increasing risks from extreme heat, energy burden, and climate impacts. Yolo County works closely with Valley Clean Energy (VCE) and local jurisdictions to strengthen program alignment by integrating technical assistance, customer outreach, and incentives. Through these partnerships and its experience administering YEP, Yolo County is well positioned to expand energy efficiency offerings and support effective NREN program implementation across the region.

¹⁴ https://files.cpuc.ca.gov/safety/fire-threat_map/2021/CPUC%20Fire%20Threat%20Map_v.3_08.19.2021.Letter%20Size.pdf

¹⁵ Hayes, Joseph, et al. Achieving Universal Broadband in California, Public Policy Institute of California <https://www.ppic.org/publication/achieving-universal-broadband-in-california/>

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

Table 1: 4-year Portfolio Budget Forecast Summary (2028-2031)

4-year Portfolio Budget Forecast Summary (2028-2031) (\$000)					
	2028	2029	2030	2031	Total (4 years)
Total Budget	\$18,692	\$20,412	\$23,740	\$26,792	\$89,636
Resource Acquisition Segment Budget	\$0	\$0	\$0	\$0	\$0
Market Support Segment Budget	\$2,477	\$2,629	\$2,745	\$2,870	\$10,721
Equity Segment Budget	\$15,468	\$16,966	\$20,045	\$22,850	\$75,330
Codes and Standards Budget	\$0	\$0	\$0	\$0	\$0
EM&V	\$748	\$816	\$950	\$1,072	\$3,585
ED Portfolio Oversight	\$0	\$0	\$0	\$0	\$0

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

4-year Portfolio Forecast Summary (2028-2031)						
	2028	2029	2030	2031	Resource Acquisition Segment Only (Total 4-year)	Entire Portfolio (Total 4-year)
Total System Benefit (TSB)	\$4,496,531	\$6,244,314	\$9,625,258	\$14,505,978	0	\$34,872,081
Total Resource Cost (TRC) Ratio	0.32	0.40	0.49	0.63	0	0.46
Program Administrator Cost (PAC) Ratio	0.32	0.40	0.50	0.64	0	0.47
Societal Cost Test (SCT) - Base	0.47	0.57	0.70	0.88	0	0.69
Societal Cost Test (SCT) - High	0.47	0.57	0.70	0.88	0	0.69

4-year Portfolio Forecast Summary (2028-2031)						
Ratepayer Impact Measure Test Ratio (RIM)	0.53	0.61	0.62	0.74	0	0.66
Lifecycle MWh/GWh	-10,245.04	-14,266.92	-9,388.44	-21,272.17	0	-55,172.57
First Year MW	/-10.25	/-14.27	/-9.39	/-21.27		/-55.17
Lifecycle MMETHERMS	0.25	0.33	0.55	0.76	0	1.88
Lifecycle Net Electric CO2 Metric Tons	0.21	0.28	0.36	0.54	0	1.39
Lifecycle Net Gas CO2 Metric Tons	-1,840.45	-2,551.68	-1,774.36	-3,963.33	0	-10,129.83
Gas CO2 Metric Tons	16,172.73	21,497.80	29,366.68	43,491.75	0	110,528.96

Table 3: 4-year Portfolio Budget Forecast Summary (2032-2035)

4-year Portfolio Budget Forecast Summary (2032-2035) (\$000)					
	2032	2033	2034	2035	Total (4-year)
Total Budget	\$29,471	\$30,945	\$32,492	\$34,117	\$127,024
Resource Acquisition Segment Budget	\$0	\$0	\$0	\$0	\$0
Market Support Segment Budget	\$3,157	\$3,315	\$3,480	\$3,480	\$13,433
Equity Segment Budget	\$25,135	\$26,392	\$27,712	\$29,097	\$118,673
Codes and Standards Budget	\$0	\$0	\$0	\$0	\$0
EM&V	\$1,179	\$1,238	\$1,300	\$1,365	\$5,081
ED Portfolio Oversight	\$0	\$0	\$0	\$0	\$0

Table 4: 8-year Total System Benefit Forecast (2028-2035)

4-Year and 8-Year Total System Benefit Forecast vs. Goals (\$000)	
Year	Total System Benefit Forecast
2028	\$4,496,531
2029	\$6,244,314
2030	\$9,625,258
2031	\$14,505,978

4-Year and 8-Year Total System Benefit Forecast vs. Goals (\$000)	
Total (4 years)	\$34,872,081
2032	\$17,098,637
2033	\$18,955,239
2034	\$21,017,202
2035	\$23,293,011
Total (4 years)	\$80,364,089
Cumulative (8 years)	\$115,236,170

Table 5: 8-year Codes and Standards Forecast

4-Year and 8-Year Codes and Standards Forecast			
Year	Energy Savings		
	MWh	MW	MMTherms
2028	-205.21	0.25	0.21
2029	-432.10	0.33	0.28
2030	76.86	0.55	0.36
2031	-520.56	0.76	0.54
Total (4 years)	-1081.02	1.88	1.39
2032	-572.62	0.83	0.60
2033	-601.25	0.87	0.63
2034	-631.31	0.92	0.66
2035	-662.88	0.96	0.69
Total (4 years)	-2468.06	3.58	2.57
Cumulative (8 years)	-3549.07	5.47	3.96

Chapter 3: Portfolio Strategies

Recommended policy changes needed for strategies

Policy changes needed in R.25-04-010 for the strategies to be successful

NREN’s approach depends on allowing fuel switching from nonregulated fuels. A significant portion of NREN’s service territory relies on propane or other nonregulated fuels as their primary source of space and water heating,¹⁶ particularly among rural, HTR, tribal, and underserved customers. Because current CPUC rules limit fuel substitution benefits only to customers moving from natural gas to electric appliances, many propane-reliant households and businesses cannot access incentives that would help them transition to cleaner, lower-emission technologies. This structural gap prevents some of the region’s highest energy burdened customers from benefiting equitably from energy efficiency programs and from participating in California’s broader decarbonization efforts. These same customers would also receive significant health benefits from improved indoor air quality by transitioning to cleaner heating sources. In the R.25-04-010 EE OIR, NREN along with the Joint RENs urged the Commission to recognize fuel switching from nonregulated fuels as eligible for EE program support. This request was built on the record previously established to support the requests; the Commission has acknowledged that such transitions can reduce GHG emissions and advance state climate goals (R.13-11-005 and R.19-01-011). Given these realities, NREN is incorporating support for nonregulated fuel customers into the core of each portfolio strategy in order to ensure that fuel switching constraints do not leave rural and propane-dependent households behind in the state’s clean energy transition.

¹⁶ <https://resstock.nrel.gov/datasets>

Policy changes needed in R.19-01-011 for the strategies to be successful

In R.13-11-005, the Joint RENs argued that “non-utility fuels such as propane or fuel oil (termed fuel switching, as distinct from fuel substitution where regulated fuels are substituted for one another) should be included in the three-prong test and eligible for energy efficiency program funding...switching from non-regulated fuels to electricity or natural gas has the potential to reduce GHG emissions and would be in line with California’s goals.”¹⁷ In response to this, the Commission ruled that consideration of fuel switching was outside the scope of the original ruling and concluded that “[f]uel substitution is permissible within the energy efficiency portfolios of program administrators, regardless of whether both fuels are provided by Commission-regulated entities, whereas fuel switching is not covered in this decision and not funded by utility ratepayer energy efficiency funding.”¹⁸ However, the Commission acknowledged the importance of assessing fuel switching, noting that “Commission policy on fuel substitution and fuel switching is likely to evolve in the next few years, and we may reevaluate in the future, either in this proceeding or preferable in the Building Decarbonization rulemaking (R.19-01-011),”¹⁹ and that “[t]hese issues will be addressed more comprehensively in our building decarbonization R.19-01-011.”²⁰ That Decision also acknowledged party comments “that argued that fuel switching (from unregulated to regulated fuels) measures should be included as permissible under the reformulated fuel substitution test,” and noted that while the Commission “might be sympathetic to this recommendation on a policy basis” it was outside the scope of the current decision.

¹⁷ D.19-08-009 section 5.1 pp.11

¹⁸ D.19-08-009 section 5.2 – section 6 pp.12-13

¹⁹ D.19-08-099 section 22 pp. 48

²⁰ D.19-08-009 section 5.2 pp.12

However, because this remains an ongoing concern with no current resolution, it is appropriate to address this issue at this time.

Strategies

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

Energy affordability is central to NREN’s portfolio design and implementation strategy. Executive Order N-5-24 directs state agencies to pursue policies that reduce long-term energy cost burdens while maintaining reliability and advancing decarbonization goals.²¹ NREN’s proposed portfolio advances these objectives by prioritizing high-impact residential and non-residential energy efficiency and electrification measures that reduce total customer energy expenditures, particularly for rural households and businesses with elevated energy burdens and historically limited access to utility-administered programs.

Rural households in California experience disproportionately high energy burdens relative to urban households, due in part to lower median incomes, older housing stock, climate extremes, and reliance on delivered fuels such as propane.²² At the same time, rural communities have historically received lower per-capita investment in energy efficiency programs, limiting their access to cost-saving upgrades.²³ NREN’s portfolio is

²¹ Executive Order N-5-24 (State of California, 2024) (directing state agencies to address energy affordability and long-term cost impacts while advancing reliability and decarbonization).

²² See, e.g., U.S. Energy Information Administration (EIA), Residential Energy Consumption Survey (RECS) (2020) (demonstrating higher average energy burdens for lower-income and rural households); California Energy Commission (CEC), Building Decarbonization Assessment (2021) (noting rural housing stock and fuel reliance challenges).

²³ California Public Utilities Commission, 2025 Energy Efficiency Potential and Goals Study Final Report (Guidehouse Inc. Final Report), Executive Summary and Background sections (indicating longstanding disparities in program participation and emphasis on hard-to-reach/underserved markets). <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side->

specifically structured to address these inequities through accessible, locally delivered solutions designed to produce durable bill savings.

For residential customers, NREN will deploy a layered delivery model tailored to customer needs and building conditions. Delivery mechanisms will include downstream rebates, no-cost home energy assessments, direct install offerings delivered by trusted local contractors, and comprehensive retrofit projects with meter-based (NMEC) savings verification where appropriate. This structure reduces participation barriers, ensures that recommended measures are technically feasible within rural building typologies, and maximizes realized savings. Assessments will be conducted by professionals with demonstrated familiarity with rural construction practices, aging housing stock, and dispersed service territories, conditions that materially affect measure suitability and cost-effectiveness. Direct install programs will ensure that high-impact measures are implemented immediately, eliminating upfront cost constraints that disproportionately affect rural customers.

For public customers, NREN will advance affordability and mitigate rate impacts by reducing operating costs for rural local governments. Rural jurisdictions frequently face limited staffing capacity and constrained capital budgets, which can delay or prevent implementation of cost-effective energy projects. Through its Public Energy Services program, NREN will provide benchmarking support, technical assistance, energy audits, project development assistance and NMEC-based performance design services at public buildings. By lowering administrative and technical barriers, NREN will enable public agencies to implement projects that reduce long-term utility expenditures, thereby mitigating fiscal pressure on ratepayers and taxpayers in rural communities.

[management/energy-efficiency/energy-efficiency-potential-and-goals-studies/2025-potential-and-goals-study](#)

NREN will also integrate load management and customer education into measure deployment. Installed technologies will incorporate controls where feasible, and customers will receive education regarding time-of-use and load shifting strategies to help reduce costs and benefit the grid through time-based load control. Demand flexibility and automated load control reduce customer costs and provide system benefits by lowering peak demand and associated procurement costs.²⁴ Within its Non-Residential Energy Services program, agricultural customers will be offered automation and controls strategies that align operational energy use with lower energy cost periods, supporting both farm profitability and grid reliability.

In addition, NREN's portfolio directly addresses rural energy affordability challenges associated with reliance on propane and other delivered fuels. NREN's territory has a heavy reliance on propane for space heating, water heating, and cooking. Propane is not a CPUC-regulated fuel, yet it constitutes a major portion of total household energy expenditures in rural California.

According to the U.S. Energy Information Administration (EIA), the U.S. average residential propane price in 2024 ranged between approximately \$3.80 and \$4.50 per gallon during peak heating season.²⁵ At 91,500 BTU per gallon, this equates to roughly \$41–\$49 per MMBtu. For a rural household consuming 500 gallons of propane annually, total fuel expenditures at \$4.20 per gallon would equal approximately \$2,100 per year, exclusive of appliance inefficiencies and seasonal price volatility. In contrast, high-efficiency electric heat pump systems, particularly when paired with building envelope

²⁴ Sean Murphy, Cesca Miller, Jeff Deason, Diana Dombrowski, and Portia Awuah, *The State of Demand Flexibility Programs and Rates*, August 2024.

²⁵ U.S. Energy Information Administration (EIA), *Weekly Heating Oil and Propane Prices, California Residential Propane, 2024 Heating Season Data*, available at: <https://www.eia.gov/petroleum/heatingoilpropane>.

improvements and time-of-use optimization, can deliver lower annual operating costs in many California climate zones.²⁶

Propane prices are also subject to significant seasonal and year-to-year volatility due to transportation costs, storage constraints, and global hydrocarbon market dynamics.²⁷

Unlike regulated electric and gas rates, propane pricing does not include comparable regulatory oversight mechanisms that mitigate abrupt price spikes for rural consumers.

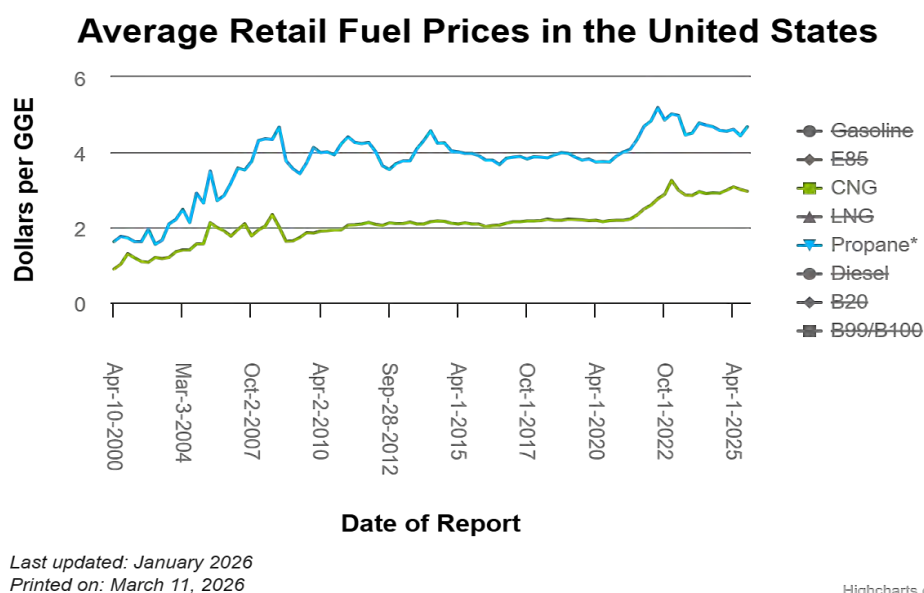


Figure 0-2: Average Retail Fuel Prices²⁸

NREN’s territory has a heavy reliance on propane, posing an affordability issue as propane in California is over double²⁹ the cost of natural gas due to transportation and storage costs, and environmental fees. This results in higher annual operating costs than

²⁶ California Energy Commission (CEC), Cost and Performance of Residential Heat Pump Technologies (2022), evaluating operating cost comparisons in California climate zones.

²⁷ U.S. Energy Information Administration (EIA), Weekly Heating Oil and Propane Prices, California Residential Propane, 2024 Heating Season Data, available at:

<https://www.eia.gov/petroleum/heatingoilpropane>.

²⁸ Trend of alternative and traditional motor fuel prices from 2000 to 2025, last update January 2026, <https://afdc.energy.gov/data>.

²⁹ <https://afdc.energy.gov/fuels/prices.html>

efficient electric alternatives. As detailed in Chapter 11, NREN recommends non-regulated fuels be considered by the CPUC to encourage fuel switching, which would decrease costs for propane customers, advance California’s electrification goals, and also provide tangible health benefits to those transitioning customers.

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

NREN’s portfolio appropriately focuses on providing non-resource equity services to rural HTR customers within its region. Therefore, NREN’s portfolio will not include programs in the resource acquisition segment, however, NREN’s equity programs will support achieving TSB benefits by promoting electrification and energy efficiency.

For example, NREN’s Public Energy Services program is an equity program that empowers local government and public agencies to implement energy savings and upgrades by using NREN provided technical support; these include benchmarking, assessments, referrals to other energy efficiency programs, state and federal funding opportunities and when appropriate, direct install through the NREN Non-Residential Energy Services program. These services will result in much needed energy retrofits and project implementation that most local governments cannot lead on their own. The TSB for these projects will not be captured in the Public Energy Services program but will be in PA programs through which the project is completed, such as PG&E’s GK12 program or NREN’s Non-Residential Energy Services program. The Public Energy Services program will also track referrals and indicate which referrals led to completed projects.

For NREN’s programs that do achieve energy savings, TSB will be tracked as a metric. The Home Energy Upgrades program will have multiple delivery channels, including downstream rebates for energy efficient electric appliances, a participating contractor direct install program offering deemed measures for heat pumps, HPWH, and building

envelope and utilizing NMEC for a comprehensive multiple measure approach. This program will have TSB goals and will be designed for movement towards increasing TSB through the program cycle. This program will promote the greater adoption of energy efficient electrification technologies by rural households.

Similarly, NREN's Non-Residential Energy Services program will move towards increasing TSB by targeting multiple non-residential sectors, including small HTR businesses³⁰ such as small groceries and restaurants, public and tribal facilities, and non-profit and CBO buildings. This program will concentrate on outreach to facilities that serve equity populations and promote the greater adoption of electrification and energy efficient technologies by non-residential facilities.

As consistently reaffirmed by the Commission since the establishment of the first RENs, REN PAs do not have a cost effectiveness threshold requirement because their portfolios are subject to different rules, their budgets and portfolios are smaller than IOU PAs, and they are inherently designed to fill gaps and serve HTR customers who are less cost-effective to serve than traditional electricity customers.^{31,32,33} Although NREN's programs will report on the TRC as required, NREN does not have a TRC goal. Rather, NREN's aim will be to achieve increasing TRC throughout the program cycle as program design and community reach lead to more cost-effective approaches, in alignment with the Commission's guidance in D.16-08-019 to manage programs with an eye toward long-term cost-effectiveness. While rural communities have been historically underserved due in part to the difficulty in serving them cost effectively, NREN's locally

³⁰ The small business HTR criteria were updated most recently in D.23-06-055 p.49-54 and Conclusion of Law 33.

³¹ D.19-12-021 at 37

³² D.23-06-055 at 22, 52, and Conclusion of Law 8.

³³ Criteria for REN programs were most recently updated in D.19-12-021 Ordering Paragraph 4, and CPUC declined to change the review criteria for RENs in D.23-06-055 at 52.

designed and implemented approach will ensure they are served in the most cost-efficient manner possible. NREN will track TSB per ratepayer dollar spent; NREN is very aware of the high value of ratepayer dollars and will ensure that these funds are used in the most effective way possible to benefit NREN's HTR and other customers. NREN takes pride and purpose in committing that ratepayer dollars which rural Northern California customers have paid over the years are finally spent in those same communities.

3. Advance building decarbonization activities in your EE portfolios

NREN's decarbonization strategies are rooted in the realities of rural Northern California, where households and businesses face higher energy burdens, have limited access to utility-administered energy efficiency programs, and have a heavy reliance on propane and other delivered fuels for heating and cooking. The low population density of the region means individuals are physically harder to reach for implementers and contractors, making adoption of clean energy technologies more difficult and more expensive than in higher population centers. Propane-reliant homes have potential for some of the largest energy-bill savings when switching to electrification, due to the volatility of propane prices, making decarbonization a priority in NREN's territory.

NREN's Home Energy Advisors program will advance decarbonization activities by increasing energy awareness and supporting energy-saving behaviors through energy efficiency kits, energy assessments and education, technical assistance from energy advisors, connections to IDSM resources, and community-based outreach to increase awareness and reduce participation burdens. All of these efforts support behavior-driven decarbonization.

NREN's Home Energy Upgrades Program will offer downstream direct-to-customer rebates for efficient electric appliances as well as direct install for heat pumps, heat

pump water heaters, and building envelope measures, directly advancing building decarbonization. The program will offer incentives for common home energy upgrades and decarbonization measures including heat pump dryers, HVAC, and water heating, and induction cooktops. Energy efficiency measures will include a variety of “whole home” items like weatherization, HVAC, and plug loads/appliances. Population NMEC projects will result in comprehensive, multiple-measure savings and higher TSB outcomes. This program will promote electrification through fuel substitution and fuel switching, while moving away from propane. Electrification along with affordability are the main goals of this program.

NREN’s Non-Residential Energy Services program targets multiple HTR sectors: small businesses, public agencies, non-profit and tribal facilities to advance decarbonization. This direct install program makes it possible for these businesses and buildings to pursue energy efficiency technologies and provide technical and project management assistance. Also included are Energy Advisor services and financial incentives. Region-specific outreach and energy assessments will provide specific, actionable recommendations for improving these businesses’ efforts to reduce energy consumption and guide the customer toward available incentives and financing options offered by NREN or PG&E and third-party program implementers. Electrification and energy efficiency measures will include a variety of items such as controls, refrigeration upgrades, lighting, heat pump HVAC and water heaters. NREN staff also work closely with local vendors and retailers to educate them on incentives and encourage them to stock more energy efficient equipment and appliances.

NREN’s Public Energy Services program will provide rural public agencies with access to benchmarking, energy assessments, project development, and funding assistance, all of which advance building decarbonization. The program will also advance

decarbonization goals by providing local governments with additional tools such as implementation of IDSM projects that could include renewables, battery storage and electric vehicle charging technologies that will complement their energy efficiency strategies. NREN provides hands-on technical assistance from discovery to implementation, closing a capacity gap common in rural jurisdictions. Addressing this gap will allow communities to pursue energy efficiency projects, which improves resilience and advances decarbonization goals.

NREN’s Energy Career Education and Training program will provide training and educational materials to local contractors. This service is necessary as local contractors are often too busy with existing workloads to focus on building-out specialized skills or recruiting and training additional staff. Upskilling the rural workforce is important to increase the implementation of energy efficiency and electrification projects within NREN’s region at lower costs.

Alongside upskilling existing contractors, NREN will partner with high schools, colleges, workforce boards, and CBOs to promote and expand career pathways into energy and electrification trades. These entities are often under-resourced to effectively market career opportunities in these skill areas, recruit trainees, and place them in internships and work experience positions. As other NREN programs increase market awareness and demand for decarbonization, activities in NREN’s WE&T sector will help to expand the pool of local trained service providers.

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

NREN’s equity programs in the residential, commercial, public and agricultural sectors all incorporate education around electricity savings at peak time to reduce strain on the grid and energy costs. These programs will incorporate both behavioral and automations elements to ensure installed equipment is used at times that are most

beneficial. Specifically, for NMEC programs, higher incentives will be tied to higher TSB achievement that aligns with the cost benefits to the customer. The residential and public programs will also incorporate IDSM into the program offerings and along with EE support after an assessment, will provide technical assistance incorporating on-site generation and storage that can be used for demand response. The IDSM offerings will also include transportation electrification and, as technologies improve, will encourage and educate users about the value and benefits of vehicle-to-grid integration.

5. Use of meter-based savings measurement

The Home Energy Upgrades program and Non-Residential Energy Services program will utilize meter-based savings in its program offerings. NREN intends to take a holistic approach to buildings, and bundle equipment and facility upgrades with controls, proper commissioning, and education around behavioral change. For the customers who qualify for whole building projects, these savings will be best quantified through a meter-based approach. NREN is currently developing these offerings for its existing resource acquisition program in compliance with D.23-06-055, requiring the use of NMEC methodology for new resource acquisition programs. A technical consultant, kW Engineering, was brought on to assist with program design and implementation and this program design will be continued into the re-segmented Non-Residential Energy Services program in 2028 and beyond.

Use of the NMEC savings approach should also enable NREN to assist its rural equity customers with capturing “stranded savings,” as intended by Assembly Bill 802.³⁴

Because these customers have been underserved or even unserved by energy efficiency

³⁴ CA AB 802 Sec. 6: “Those programs shall include energy usage reductions resulting from the adoption of a measure or installation of equipment required for modifications to existing buildings to **bring them into conformity with, or exceed, the requirements of Title 24 of the California Code of Regulations**, as well as operational, behavioral, and retrocommissioning activities reasonably expected to produce multiyear savings. [emphasis added]

programs in the past, they may have missed the opportunity for incentivized upgrades to certain equipment that are no longer available through deemed savings-based programs due to deemed workpaper retirement, for example, lighting measures.

6. Promote and deploy “exempt measures”³⁵ in the equity segment

Rural electricity customers face a barrier around resiliency when it comes to electrification for several reasons. Resilience is a major concern in Northern California counties, as they are particularly hard hit by outages due to winter storms and wildfires, and more prone to prolonged outages and weather-related PSPS events as more remote locations are de-prioritized for repairs and re-activation over population centers,³⁶ as well as outages resulting from increased use of fast-trip technology. Even customers who are open to electrification often retain grid unreliability. These back-up options are particularly important for customers that must also have power to run wells and provide water to their homes. Rural customers pride themselves on being prepared for weather outages and reduced reliance on grid electricity.

For these customers, NREN can encourage envelope measures that align with the exempt measure definition, that will produce savings for both electric appliances and gas appliances. Exempt measures such as weatherization, insulation, air sealing, and envelope upgrades deliver important energy and non-energy benefits even when full electrification is not feasible. These measures reduce therm usage, improve comfort, and enhance indoor air quality. Additionally, deploying these exempt measures helps support electrification readiness for these customers by preparing their homes and

³⁵ As defined by D.23-04-035

³⁶ <https://www.pge.com/en/outages-and-safety/outage-preparedness-and-support/understanding-electric-outages.html>

businesses for an HVAC heat pump or HPWH installation when the customer becomes ready or a new customer occupies the space.

NREN’s territory includes a large number of customers reliant on propane and other non-regulated fuels. Fuel switching from propane is not considered electrification under current fuel substitution guidance in D.19-08-009. In addition, other energy efficiency measures that could benefit these customers are limited by current measure packages, which poses a major barrier in NREN’s region for being able to support equity communities. Exempt measures allow these customers to reduce fuel usage, improve comfort and health, and prepare for electrification even when they cannot yet transition away from propane or other fuels. These measures would also contribute to other societal non-energy benefits such as reduced GHG emissions. NREN has provided policy recommendations in Chapter 11 to address these limitations.

To support these customers as well as customers who are not willing or are unable to electrify at this time, NREN’s residential and non-residential programs will promote and deploy exempt measure pathways targeted to rural homes and small businesses. NREN will assess and address customer barriers, including resiliency concerns or older home conditions. NREN intends to reach customers through targeted local engagement, education, technical assistance, and workforce training. Outreach will be tailored to customers who do not plan to electrify or who rely on non-regulated fuels and stand to benefit from exempt measures. NREN’s Energy Career Education and Training program will also train local contractors on the importance of exempt measures, increasing the local trust in the workforce. NREN’s approach will prioritize gas savings and electrification readiness outcomes.

7. Increase progress on CPUC’s ESJ Action Plan goals

NREN’s EE portfolio is intentionally designed to advance the CPUC’s ESJ Action Plan³⁷, particularly goals 1, 2, 4, 5, and 7. NREN’s approach follows the Equity Advisory Committee (EAC) recommendations as a framework for ensuring meaningful and measurable progress towards these goals.

ESJ Goal 1: Consistently integrate equity and access considerations throughout CPUC proceedings and other efforts.

NREN integrates equity and access across all portfolio segments by implementing the EAC’s procedural equity guidance for streamlined eligibility. Rural and disadvantaged communities face disproportionate administrative burdens that often limit their ability to participate in energy efficiency programs. NREN will use geographic eligibility models to reduce documentation and income-verification barriers for rural and underserved customers. NREN will also protect participant privacy to ensure vulnerable populations can safely participate without their information being compromised. If populations do not meet every single criteria for a program but are still vulnerable, NREN will use limited implementer discretion to make the program available to these populations. An example of this in action is NREN attending to the needs of customers with nonregulated fuels. Current rules exclude propane customers from fuel switching benefits, which poses a major threat to energy efficiency in NREN’s territory. NREN’s policy recommendation to allow for fuel switching would integrate equity and access to cleaner energy for customers with nonregulated fuels. These actions will help NREN

³⁷ Environmental and Social Justice Action Plan, Version 2.0. California Public Utilities Commission. <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/news-office/key-issues/esj/esj-action-plan-v2jw.pdf>

simplify the process for these communities, which supports ESJ Goal 1 by improving access and reducing friction for underserved groups.

ESJ Goal 2: Increase investment in clean energy resources to benefit ESJ communities, especially to improve local air quality and public health.

NREN targets investment directly into rural and equity communities throughout each of its programs. Electrification leads to decreased GHG emissions associated with natural gas and other fuel combustion, which improves air quality and public health. NREN was an active participant in the Non-Energy Benefits Working Group, which identified relevant NEBs to NREN’s programs, including better health at the participant level as well as better health at the societal level. Across NREN’s EE portfolio, converted gas measures would lead to health and safety improvements. Additionally, NREN’s efforts support the transition from propane to electric for its customers. Replacing propane, which is a high-cost polluting fuel, with energy efficient electric technologies would improve air quality and indoor comfort and safety.

ESJ Goal 4: Increase climate resiliency in ESJ communities.

NREN’s territory experiences high wildfire risk, frequent outages from fast-trip settings, PSPS events, and capacity-constrained distribution infrastructure. To combat these risks, NREN’s programs promote electrification and weatherization actions to reduce vulnerability. Additionally, NREN’s Home Energy Advisors and Public Energy Services programs will employ connections to IDSM resources such as EV charging, solar, battery storage, and demand response. IDSM resources will increase the resiliency of NREN’s regions by reducing load. NREN’s Public Energy Services benchmarking and technical assistance activities will help public buildings reduce loads and become more resilient community hubs. NREN will focus on reaching communities that have been impacted by

climate-driven natural disasters and recommends the CPUC include natural disaster-impacted communities in its definition of ESJ communities.

ESJ 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.

NREN is committed to decreasing barriers to participation in EE programs. NREN’s territory is defined by rural areas that require long travel distances, limited contractor availability, and historically low participation in IOU programs. NREN’s portfolio of programs is centered around its communities in the rural region. NREN will engage with trusted community-based partners such as CBOs, tribal governments, and rural nonprofits.

NREN intends to limit the use of third-party implementation from outside the region in order to be more community centered. NREN is committed to implementing its programs locally and hiring individuals from within the community to do so.

ESJ Goal 7: Promote high road career paths and economic opportunity for residents of ESJ communities.

NREN’s Energy Career Education and Training program in the WE&T sector is designed to enhance public participation opportunities for individuals within ESJ communities to improve their energy efficiency skills and knowledge. The Energy Career Education and Training program will use targeted outreach to develop the workforce for underrepresented rural populations. This program builds capacity within geographically distant communities and provides local contractors who can implement the measures prescribed by the NREN or other electrification or efficiency programs.

8. Utilize Integrated demand-side management (IDSM) strategies

NREN does intend to pursue IDSM activities in its Public Energy Services and Home Energy Advisors programs in the form of technical support.

The Public Energy Services Program will offer facility assessments that will include recommendations for on-site generation, energy storage, and transportation electrification. The program will also support more in-depth feasibility studies that can be used for funding applications for EE and IDSM projects such as the California Energy Commission’s (CEC) Energy Conservation Assistance Act (ECAA) loans or PG&E’s On-Bill Financing. For transportation electrification, NREN has the advantage of having two transportation agencies (LAPC and MCOG) and a CCA with existing transportation programs (RCEA) in its partnership makeup. NREN will leverage this existing expertise and these programs in its offerings.

In the Home Energy Advisors Program, similarly, NREN will incorporate solar, battery storage, and electric vehicles into its home assessment report recommendations; NREN’s Energy Advisors will offer technical support on questions related to those technologies. In the residential sector, NREN will leverage the programs from its existing three CCAs, Pioneer Community Energy, Sonoma Clean Power, and RCEA, to advance projects that will combine IDSM and EE. Funding support to access Go Green Financing or potential TOB for residential customers can also be provided to ensure capital for projects.

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

NREN’s Energy Career Education and Training (ECE&T) efforts are designed to expand the availability of skilled local workers who can deliver high quality energy efficiency and

electrification installations throughout the region. The program increases workforce readiness by first building broad awareness of energy related career pathways and helping future workers understand how energy projects create opportunities for stable, well paid, resilient jobs. By elevating community knowledge of these opportunities, the program strengthens the pipeline of individuals interested in entering the EE and electrification workforce.

A core component of this strategy is direct engagement with workers and jobseekers in NREN communities. Because rural residents often face barriers to accessing existing training—such as travel distance, limited schedules, or lack of region-specific opportunities—the program delivers trainings in ways that are accessible and convenient. This includes working with existing programs to offer remote learning options, hybrid sessions, and in person instruction within local communities, ensuring that prospective workers can participate regardless of geographic constraints. For those opportunities that only exist for in-person participation outside the region, travel stipends can be provided to increase access.

To accomplish an increase in locally available training, the program partners with trusted local agencies—including community colleges, tribal entities, and labor apprenticeship programs—to deliver high-quality training across the NREN region. These partnerships allow NREN to leverage existing educational infrastructure while tailoring content to the needs of a rural energy workforce. Through these collaborations, trainees gain hands-on skills in building science, electrification technologies, weatherization, and EE installation best practices—skills that directly translate into higher quality project delivery in the field and high road jobs for trainees within the communities served.

Finally, the program creates pathways from training to employment by coordinating placement opportunities within other NREN programs and initiatives. By connecting

graduates directly with real project work—whether through direct install programs, contractor networks, or public sector facility projects—the ECE&T program ensures that workers can immediately apply their skills, gain experience, and contribute to improved installation quality across the region. This end-to-end approach—from awareness to training to job placement—strengthens the rural workforce and increases the reliability, quality, and community benefit of NREN’s energy efficiency activities.

10. Regularly report demographic energy efficiency program participation information, as required by D.23-06-055 (OP 23)

A joint PA report was filed on reporting demographic information to the CPUC in August of 2025. This report includes the agreed upon demographic data to be reported including: rate code, CARE/FERA/ESA participation, NEM participation, census block group, preferred billing language, dwelling types, service types, and annual usage amounts. For customers participating in NREN programs, this information is already collected through the customer’s SAID, data from PG&E, and location data from the address. NREN has developed R code for matching addresses with census tracts to assist with identifying which customers are in DACs or underserved areas. Language information and tribal affiliation are gathered on application forms to identify HTR customers.

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

The overarching challenge for NREN’s territory is rurality. Rurality shapes every aspect of how NREN’s programs must be designed and delivered to provide equitable access to energy efficiency services for NREN’s customers. While there are varying definitions of “rural,” NREN first relies on the CPUC’s regulatory definition of hard-to-reach (HTR)

customers, which explicitly recognizes geographic isolation as a barrier to participating in EE programs for residential and small business customers. [cite] Under this definition, the majority of NREN’s territory qualifies as geographically HTR or underserved, meaning that residents routinely face structural barriers such as long travel distances, limited contractor availability, sparse broadband coverage, and historically low access to EE programs. For NREN, rurality is a defining operational reality that shaped the design of its programs.

On top of geographic isolation, NREN communities also contain disproportionately high concentrations of other CPUC-defined equity populations, including underserved and low-income households.³⁸ Disadvantaged communities (DAC), when tribal lands are included, also add to the equity populations. Many rural residents qualify for income-based programs, while many others fall just above eligibility thresholds yet still experience high energy burdens and limited access to capital. These overlapping equity characteristics intensify the structural challenges associated with rurality and reinforce the need for a portfolio centered on equity. NREN’s strategies prioritize solutions that directly address rural barriers, including direct install services, electrification readiness, trusted partner engagement, and enhanced financing pathways. These solutions ensure that rural customers who have historically been excluded from statewide programs, will have access to and can benefit equitably from energy efficiency and decarbonization opportunities.

The table below describes NREN’s strategies for the barriers each of its segment faces:

³⁸ Definition adopted in D.18-05-041 COL 27

Table 6: Portfolio Segment Barriers and Strategies

Segment	Common Barrier	Strategy
Equity	<ul style="list-style-type: none"> • HTR customers • Long travel distances • Contractor shortages • Reliance on non-regulated fuels 	<p>NREN will partner with trusted local entities such as CBOs, tribal governments, and non-profits to reduce distrust, language barriers, and unfamiliarity with EE.</p> <p>NREN will target customers relying on propane.</p> <p>NREN will conduct local education and outreach activities to connect with local communities.</p>
Market Support	<ul style="list-style-type: none"> • Contractor shortages • Lack of access to EE information • Supply limitations and installation barriers • Financial barriers to completing EE and electrification projects 	<p>NREN will increase the demand for EE and electrification upgrades through education, market awareness, and community-based engagement in rural, tribal, and HTR communities.</p> <p>NREN will upskill the rural workforces through educational partnerships and contractor trainings. NREN will work with local vendors and retailers to encourage stock of energy efficient appliances and equipment.</p>

The table below describes NREN’s strategies for the barriers each sector faces:

Table 7: Portfolio Sector Barriers and Strategies

Sector	Common Barrier	Strategy
Commercial	<ul style="list-style-type: none"> • First costs; limited funds for energy upgrades • Lack of information • Smaller jurisdictions tend to have low capacity to pursue funding 	<p>NREN will conduct direct personal engagement with local staff that understand local concerns and needs. NREN will also provide funding support to the non-residential sector.</p>

Sector	Common Barrier	Strategy
	opportunities and programs	
Public	<ul style="list-style-type: none"> ● Lack of funding ● Lack of staff capacity ● Lack of understanding of available resources 	<p>NREN will establish strong relationships with local elected officials and key staff, providing clear and effective communication and education while providing technical support such as benchmarking and assessments.</p> <p>NREN will also provide critical added staff support as well as serve as a conduit to existing third party programs and potential outside funding. NREN will help reduce existing barriers and lead public sector agencies through their journey to address energy efficiency and IDSM opportunities at their facilities.</p>
Residential	<ul style="list-style-type: none"> ● Rural and underserved communities face disproportionate energy burden ● Barriers to participation (first costs, further distances to participating vendors, fewer contractors resulting in higher installation costs) ● Historic underinvestment in energy efficiency and clean energy resources 	<p>NREN will provide flexible, community-based outreach, energy education, and advisor support to reduce participation barriers in rural and underserved communities.</p> <p>NREN will also provide support navigating upgrades or minimizing need for panel upgrades, offering remote downstream service, and a participating contractor model.</p>

Sector	Common Barrier	Strategy
	<ul style="list-style-type: none"> • Lower than average income 	
Finance	<ul style="list-style-type: none"> • Small businesses are located in low-income, HTR communities • First costs • Low credit scores 	NREN will conduct marketing and outreach targeted at equity customers. The program will establish targets that will ensure achieving a high percentage of participation from targeted equity customers.
WE&T	<ul style="list-style-type: none"> • Lack of access to education and training opportunities to expand job opportunities • High population of HTR customers spread over wide geographic region 	NREN will conduct multifaceted outreach activities throughout the region. Targeted campaigns and multilingual outreach will reach underrepresented populations.

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

NREN will act as a trusted advisor to rural customers to advance the state’s GWP refrigerant mitigation policies. As part of NREN’s energy efficiency offerings, NREN will train the local workforces in our rural regions to increase awareness of alternate refrigerant solutions to enable rural customers to adopt lower and zero-GWP refrigerant applications for all applicable technologies (e.g., electric heat pump water heaters, HVAC systems, refrigeration systems).

NREN’s strategy for incorporating low global warming potential (low-GWP) refrigerants in the portfolio is described in the table below:

Table 8: Portfolio Sector and Strategy for Incorporating low-GWP refrigerants

Portfolio Sector	NREN Strategy
Residential and Commercial	Incorporate LGWP specs for rebated equipment (such as HVAC heat pumps and HPWHs); Low GWP Refrigerant information incorporated into recommendations in assessment reports.
Public	Low GWP Refrigerant information incorporated into recommendations in assessment reports.
Finance	Minimum technical requirements for financed equipment (such as HVAC heat pumps, HPWHs)
WE&T	Provide information to WE&T participants, building code officials, contractors, and designers about CFC phase-out and low GWP refrigerant benefits and code requirements.

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

As described throughout this BPA, the territory served by NREN has many unique characteristics and challenges that are barriers to energy efficiency adoption and market transformation. NREN approaches these as opportunities for innovation. Strategies incorporate equity principles and needs throughout the portfolio. They are based on years of experience working in rural regions by RCEA, SBC, and County of Yolo, and the needs of the communities that are only recently beginning to receive services in Mendocino and Lake Counties. For example, the third-party implementation that is used throughout California has not been as successful in reaching rural customers' unique needs compared to more urban customers. NREN will rely on boots-on-the-ground delivery of services using CBOs or trusted partners within communities being served in order to expand reach across the large territory.

A non-residential needs assessment was conducted by ERI in 2025 in NREN territory and reported: “The findings reinforce that rural and HTR communities require locally rooted program delivery models that are easy to understand, affordable to participate in, and designed around trusted contractor networks and familiar trade channels. Programs that reduce red tape and “meet customers where they are” are more likely to succeed in these communities.”

NREN will focus on relationship and trust building, marketing and outreach with a message centralized around affordability and resilience with reaching climate goals as an added benefit rather than the prime motivator. Using local staff and CBOs based within territories instead of third-party implementers will save cost, leverage understanding of and connection with the community, and build trust. It will also have the additional benefit of building community capacity and workforce development for these secluded, rural areas in the climate and energy fields. NREN will use multiple methods of engagement instead of relying primarily on online approaches, leaning heavily on in-person and over-the-phone interactions.

Partnerships and relationships are key to NREN’s programs’ success. The Public Energy Services program delivery approach will be very hands-on with considerable time spent with local elected officials and then key staff to develop long-term relationships and access. The under-resourced local public agencies and schools in the region will understand that NREN is their partner in achieving their climate goals, facility improvements, and access to energy efficiency services from statewide or federal opportunities. Although primarily a downstream program provider, NREN will be engaging with equipment vendors to promote new technologies such as heat pumps and heat pump water heaters to a wider segment of contractors and the general public. The Energy Career Education and Training program will partner with community

colleges and local contractors to facilitate opportunities where students get college credit while earning a wage and receive on the job training in a position that can lead to full-time employment.

Additionally, NREN intends to incorporate IDSM into its residential and public programs. The inclusion of IDSM will provide a new and broader energy menu for equity customers that could include renewable energy generation, battery storage, electric vehicles, and electric vehicle charging infrastructure. Oftentimes, the prospect of on-site generation, back-up energy storage or electric vehicles can be more attractive to a rural customer for resilience reasons. NREN's programs will help the customers along a roadmap to those goals with the understanding that energy efficiency is a first step. This strategy has proved successful through the Public Agency Solar Program implemented by RCEA prior to NREN's formation.

NREN plans to use data driven analytics to help target our message and distribution, thus reducing costs by communicating with customers in the most effective manner. This will include having a stronger social media and general media presence and collecting feedback data on interactions with our content. NREN will generate interest by creating and sharing short, entertaining and effective videos about our programs that will include happy customers and NREN staff at recognizable local community events. This content will also include how-to videos related to our services such as showcasing energy efficiency kits, best practices for operating heat pump systems, completing a rebate application, or how to read a utility bill; using approachable and relatable material to reach a rural audience as opposed to highly produced media.

Because we are based within and around the communities we serve, NREN is able to procure immediate feedback on the success of our strategies and be ready to quickly

adapt. NREN intends to use innovation to stay nimble to the changing needs of rural Northern California.

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

NREN values robust and meaningful community input in the design of its program. Since most of NREN territory has been traditionally underserved across all sectors, gathering this input becomes even more vital to NREN’s success in addressing community need. NREN’s approach to gather community input has been both formal and informal. While designing programs, NREN worked with outside consultants to conduct comprehensive and unbiased needs assessments. At the time of the preparation of this BPA in the beginning of 2026, needs assessments have been completed across the public and commercial sectors as well as a cross-sector study focusing on financing needs, and are in process for the residential sector.

All of these needs assessments have been multi-modal, utilizing in-person and phone-based interviews, focus groups, and surveys conducted with potential recipients of NREN services, contractors, CBOs, and other stakeholders. A universal finding of these efforts has been that utility customers in NREN territory have had little connection with energy efficiency services, emphasizing the need for strong education and outreach efforts when launching our programs as well as simplified program requirements to minimize barriers to market penetration.

NREN has responded with a suite of services that require minimum initial customer effort, including offering residential energy efficiency kits, phone-based home

assessments, and direct-to-consumer downstream rebates. These services are designed to accompany further education and outreach efforts to engage the customer to explore additional steps in their energy efficiency journey, including behavioral changes, additional electrification, and direct install services. The financing needs assessment is leading to deeper adjustments to that program rollout. Contractors have voiced concern that new, REN-led financing programs might cause confusion in the marketplace rather than support greater adoption, as originally hoped. They stated what is needed is greater education and assistance in accessing existing financing programs and consistency in incentive offerings. This information led NREN to reconsider the best use of its financing program to fill in gaps in a way that will effectively support the energy efficiency marketplace and encourage project adoption.

NREN is comprised of four partners whose agencies are governed by board members representing diverse segments of their communities, as well as community advisory boards directly speaking for the needs of consumers. NREN staff regularly engage with these boards, as well as boards of their member jurisdictions, describing program design and rollout and soliciting feedback on what can be improved.

Furthermore, NREN is structured on a “for rural, by rural” foundation, and NREN staff are leveraging their combined decades of experience delivering services to our rural communities. NREN leadership has served their communities in education, social services, healthcare, environmental restoration, tribal and municipal government, trades, and more. Rural communities function through trusted communicators, and NREN is both staffed by people who have been those communicators and have strong connections to these communities. This informal community engagement can be the most effective and impactful way of learning what works and what can be improved in program design. NREN has first-hand experience that programs designed far away and

primarily for more metropolitan customers have not been effective in reaching rural Californians, which is why NREN’s philosophy of locally designed and implemented programs is so essential, providing real opportunities for engagement and influence over program design and delivery. This local experience combined with an equally robust formal survey methodology is NREN’s formula for success in equitably serving California’s rural hard-to reach communities.

Additionally, one of the most direct ways that we gather input and feedback is through ongoing, in-person interactions with customers. This is achieved by robust education and outreach activities where NREN staff interact with the public at a wide range of community events such as farmers markets, libraries, churches, senior centers, veterans’ halls, community festivals, fairs, as well as via our phone based and onsite assessments. NREN also gathers feedback from our partner CBOs, who can provide insightful perspectives on their local communities. This direct and ongoing engagement with the public in diverse settings and locations facilitates valuable community engagement and ensures that NREN staff are in touch with community needs, gathering feedback, and using that information and feedback to inform programs.

With programs operated by local NREN staff, each energy assessment can also act as a needs assessment, gathering data on homes and businesses within the territory and identifying their characteristics. Staff will be establishing ongoing relationships and lines of communication leading to feedback; the data gathered can directly affect program improvements. Program participants also receive follow-up surveys and feedback is gathered, analyzed, and discussed during strategic planning.

Chapter 4: Forecast Methodology and Zero-Based Budgeting

Given the region’s large geography with low population density, recent and pending territory expansion, and historical service gap, the request aligns with CPUC guidance that REN budgets be proportional to IOU budgets for customers served and explicitly account for hard-to-reach (HTR) populations. In short, the scale and complexity described justify above-average outreach and implementation costs per customer compared to urban areas, making the funding ask reasonable on both policy and operational grounds. NREN’s portfolio uses a mix of delivery types and a variety of measures tailored to the reality of rural load shapes and buildings. Rural delivery is intrinsically more resource-intensive but also captures high value savings.

1. The region is vast and sparsely populated—raising customer delivery costs

NREN’s service territory spans some of the most sparsely populated regions in California. Alpine County averages ~1.6 people per square mile, the lowest in California based on the 2020 census; Mendocino is ~26/sq mi and Mariposa ~11/sq mi³⁹—all far below urban counties. From the closest metropolitan areas, drive times to those regions range from 3 hours to 5 hours along winding roads prone to closures from rockslides and wildfires. Vast distances requiring long travel times make delivery costs inherently higher than in more populated areas. Operating programs from NREN agencies within the region can shorten travel times, but even within a single NREN county, drive times can be long. Reaching one of the corners of Humboldt County is still a 2-hour mountainous drive from Eureka, where NREN programs are administered. Delivering services requires long travel times, more site visits, and repeated contact, especially for

³⁹ [California 2020 Census Population Density By County Map](#)

tribes, seniors, and digitally disconnected customers. These geographic realities demand higher outreach and implementation costs per customer.

The geographic spread of the customers in the region does not make serving those customers attractive to implementers who are required to focus on cost-effectiveness. CPUC recognizes RENs were created to fill service gaps and reach hard-to-reach households that IOU portfolios have historically been restricted from serving, which is more resource-intensive than serving dense urban loads. NREN uses innovative approaches such as using local staff or partnering with local CBOs in the most remote areas, rather than trying to implement through a third-party based in a metropolitan area.

2. The portfolio is expanding to new counties and growth of programs—requiring front-loaded investment

In NREN’s first program cycle, reaching into counties that have historically been underserved was a proud accomplishment. In this next program cycle, NREN intends to continue expanding that reach and scaling programs particularly in the Northern Sierra counties. Additionally, NREN will expand into two new counties, Trinity and Yolo, and explore expansion into four beyond that - Colusa, Glenn, Tehama, and Shasta. This expansion requires additional staffing, training, and local partnerships. Start-up and expansion costs such as hiring, training, stakeholder engagement, and tribal outreach have been budgeted above steady-state levels. This growth requires higher implementation costs, especially for HTR and tribal communities.

3. The region has been historically underserved—necessitating catch-up spending

CPUC’s REN framework was adopted because traditional portfolios under-served HTR and disadvantaged communities; RENs are to address those gaps with tailored, community-based approaches. Many NREN communities have never received consistent

outreach, local contractor engagement, long term energy planning support, or public agency assistance. Rural residents, tribal communities, and residents in manufactured homes are historically underserved for energy efficiency programs. Rural customers also face power outages and wildfire risks that shape behaviors of keeping propane or wood as backup power sources. Catch-up investments including deeper outreach, education, and trust-building are programmatically required. Remedying underinvestment is necessary to bring rural communities to a baseline level of participation compared to urban regions that have benefited from energy efficiency programs.

4. Regulatory guidance supports proportional budgets that reflect HTR service plans

The CPUC gives explicit guidance that REN budgets should be proportional to incumbent IOU budgets for the number of customers served by non-statewide/non-regional programs, while taking into account plans to serve hard-to-reach customers.⁴⁰ NREN's current budget request does not exceed the historic EE budgets for the number of customers served. However, ratepayers in NREN regions have contributed funds to develop and implement programs that did not provide a proportional number of services to the rural customers. NREN's role is to ensure that those funds now reach the customers who support their programs and who also tend to be the most in need of services.

5. Cost drivers outside program control have risen

Tariff-driven increases in heat pump and component costs, along with the needs of senior and low-income customers, create a need for NREN to provide higher rebates

⁴⁰ CPUC Decision (D.)19-12-021 p.39: "We also give some further guidance on appropriate budget levels dedicated to REN programs. Since RENs are not required to meet a specific cost-effectiveness threshold, this guidance should help RENs gauge the reasonableness of budget proposals. Simply put, the RENs' budgets should be proportional to the incumbent IOU budgets, in the same territory, for the number of customers served by non-statewide and non-regional programs,¹⁰ while taking into account plans to serve hard-to-reach customers. "

that make adoption more accessible. By calibrating incentive levels against current market costs each quarter, NREN can stay responsive to real-world conditions and adjust rebates thoughtfully over time.

In addition, rising travel costs, software licensing needs, and cybersecurity insurance premiums must be met for NREN to continue delivering high quality, secure, and compliant programs across large rural regions. As reporting requirements continue to evolve—with new metrics, mapping needs, and census tract-based equity indicators—NREN will focus on streamlining processes and applying efficient solutions to meet these requirements while maintaining strong program performance.

6. Scarcity of EE PAs within NREN's territory

NREN serves a region that has been historically disinvested and has disproportionately low uptake in energy efficiency programs. While some regions in California benefit from multiple PAs with multiple layers of program activity, NREN's territory does not experience the same level of coverage and therefore requires a larger program presence from NREN to ensure communities have equitable access to energy efficiency programs. As a result, NREN's budget proposal reflects its plans to provide robust EE program offerings to those that have previously been unable to participate in statewide and IOU programs. Consistent with D.19-12-021, a REN's plans to serve HTR customers should be considered when evaluating the REN's budget proposals. NREN's focus on reaching underserved and HTR populations is a key and critical component of its program design and funding request. NREN's goal is to address persistent inequities in program participation and ensure that its region receives opportunities to benefit from EE that were previously inaccessible to them.

7. Local implementation improves cost effectiveness

NREN does not primarily use third-party implementers for its programs. Implementers have shown less interest in the region due to the vastness of the region, the additional costs of travel, and lack of trust from customers. Because of this, NREN staff implement the programs from marketing through boots on the ground delivery of services. Both the County of Yolo and Sierra Business Council also engage local CBOs to assist with outreach efforts and some of the service delivery. Compensation is provided to those CBOs. This is proving to be effective during the 2024-2027 program cycle and NREN intends to continue this model while scaling up services. Generally, compared to third-party implementer charge-out rates, NREN staff costs including overhead are relatively low. NREN does hold contracts for technical and regulatory support for administration and engineering support for custom and NMEC projects.

8. Services previously provided under Local Government Partnerships will be included in NREN services

RCEA and SBC have served public agencies within their respective service territories through Energy Watch and Local Government Partnerships with PG&E since 2006 and as of the writing of this Business Plan have extended these programs through 2027. The RCEA Redwood Coast Energy Watch (RCEW) and SBC Sierra Nevada Energy Watch (SNEW) predate the LGP program. While the two partners' programs are not identical, both provide similar services to public agencies including comprehensive assessments, facility benchmarking, referrals to service providers, strategic energy planning, funding acquisition, education, and training for agency staff. The status of these specific partnerships and the LGP program past 2027 is unknown; funding for some partnerships has already been greatly reduced in the most recent contract renewal. Due to this uncertainty, NREN opted to include these activities for the RCEA and SBC service territories within the NREN Public Energy Services program beginning in 2028. This will

allow for greater collaboration on program development and delivery of service offerings across the entire service territory, and ensure that rural government jurisdictions, tribes, and other facilities receive quality, consistent, and uninterrupted support. If the 2028 status of the RCEW and SNEW programs changes, NREN programs and budgets will be adjusted accordingly.

9. Budget is directly tied to increased KPIs and measurable performance improvements

NREN's requested budget is built from the ground up to meet higher portfolio Key Performance Indicators (KPIs) required by the CPUC, including increased equity participation, higher Total System Benefit (TSB), deeper electrification rates, expanded NMEC delivery, and measurable improvements in rural contractor workforce capacity. Unlike urban service territories where KPIs can be achieved at lower marginal cost, hitting these targets in rural regions requires more staff time per project, more contractor training, longer travel distances and time, and more complex project development, all of which directly influence KPI achievement. NREN's budget therefore reflects the investments necessary to deliver these outcomes at-scale. NREN's KPIs ensure that ratepayer dollars are tied to clear, measurable, and reportable performance improvements.

Methodologies to forecast and allocate Resource Acquisition, Equity, Market Support, and Codes and Standards program budget and benefits

To establish the budgets for the equity programs, NREN estimated service levels and set internal Key Performance Indicators (KPIs) across the different regions that are tied to achieving the goals of the portfolio. Those achievements were then tied to the staffing levels and CBO partnerships needed to be able to reach those KPIs in the context of the factors listed in section (i). The cost of education and outreach activities, energy efficiency kits, and technical consultants were also included, using historic contract

values and estimated escalation rates. To maximize adoption, incentives were set to measures low or no-cost, particularly for equity customers, and calculated for the forecasted portfolio of offerings.

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

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

Methodologies to forecast and allocate program budget and benefits by sector

The methodologies for sector-based program budgets were similar as described above for the equity segment as NREN's equity programs will serve the residential, commercial, agricultural, and public sectors. NREN tied the staffing and costs for each sector to the KPIs to be achieved for the sector. For residential this included in-house staff and CBO partnerships, cost of education and outreach, energy efficiency kits, and incentives. The non-residential programs, which cover the commercial, public, and agricultural sectors by providing direct install services included staffing costs, incentives, and technical consultants to assist with engineering calculations related to custom and NMEC

projects. The Public Energy Services program budget does not include incentives and is primarily the cost of staff.

NREN also intends to leverage existing programs that are available region-wide such as the Energy Savings Assistance Program, Home Energy Score California (BayREN), Energy Code Ace, GoGreen Financing, and On-Bill Financing. The intent is to ensure funds and efforts are being spent by bringing existing services to our region that historically had barriers to delivering in NREN’s territory and not duplicating those services unless the program cannot serve the area.

Benefits to the residential and non-residential (commercial, agricultural, and public) customers include TSB and savings calculated using the CET. Additional benefits for the programs will include services delivered - for residential in terms of assessments performed, kits delivered and educational opportunities, and for the commercial program, number of assessments completed and non-energy benefits guided by the NEB study that is currently ongoing.⁴¹ The public program will also measure the benefits provided to the local governments through technical support, funding assistance and project management support.

The Energy Career Education and Training program is the sole market support program and methodologies are described in section (ii) above.

Methodologies and calculations used for fuel type splits

NREN's methodology for portfolio-wide fuel type and IOU splits is consistent with D.19-08-009, which directs that the utility serving the “new fuel” shall be allocated the costs and savings associated with fuel substitution projects. The electric utility (PG&E Electric)

⁴¹ Illume, LLC. Market Rate Equity Segment Non-Energy Benefits Research Plan
https://pda.energydataweb.com/api/view/4183/CA%20Market%20Rate%20Equity%20Segment%20NEBs%20Study%20Research%20Plan%20v20250701_clean.pdf

is designated as the new fuel utility for fuel substitution. NREN's portfolio-wide fuel type and IOU splits are as follows:

PG&E Electric: 84%

PG&E Gas: 16%

As reflected in Sheet 3.1 of the BPA Workbook filed concurrently with this Application, cells D18–D21 summarize total portfolio costs for Program Years 2028–2031, and cells D22–D25 provide estimated costs for Program Years 2032–2035. The fuel allocation for the total costs for years 2028–2035 is 100% electric and 0% gas for fuel substitution expenditures. For all other costs excluding fuel substitution, the fuel split is 80% electric and 20% gas.

The revised portfolio-wide fuel split was derived by calculating the proportion of total incentive expenditures attributable to fuel substitution projects relative to total portfolio incentive expenditures. The calculation is as follows:

$$\text{Fuel Substitution Incentives} \div \text{Total Portfolio Incentives} = \text{Electric Allocation Percentage}$$

This methodology results in an electric allocation of 84% and a gas allocation of 16% across the total portfolio budget. The adjustment from the prior 80%/20% split reflects the increased scale of electrification and propane fuel-switching activities proposed for the 2028–2031 cycle.

Methodologies and calculations used to derive a zero-based budget (D.21-05-031, COL 22, OP 8)

Using regional KPIs divided across NREN's four partner agencies, including the addition of Yolo County, the amount of program staff needed within each region and NREN wide was estimated to achieve those metrics. Because the programs are not changing in

design but primarily in scale, the increase in goals and reach were used to scale up the staffing needs. Existing contracts with consultants were used to estimate future consultant costs. An escalation rate of 5% was used year over year to account for rising costs due to inflation. Additional costs include the operational costs of the Salesforce NREN database, cybersecurity required to access PG&E data, and legal fees.

Program Modifications from 2024-2027 portfolio cycle

NREN’s portfolio of six programs remains the same as the 2024-2027 cycle with the following significant changes:

- Starting in 2026, NREN consolidated activities from the Codes and Standards program into the WE&T program, Energy Career Education and Training.⁴² Those activities will continue to be offered under the ECE&T program in 2028-2031.
- NREN will continue to offer two resource programs with claimable energy savings: the Home Energy Upgrades program and the Non-Residential Energy Services program. The programs will now be segmented as equity programs instead of resource acquisition to align with the primary functions of the programs.
 - In order to properly demonstrate this re-segmentation starting in 2028, new program IDs were generated in CEDARS.
 - Home Energy Upgrades has the program ID RRN002 for the portfolio cycle ending in 2027. For the portfolio cycle beginning in 2028, Home Energy Upgrades will have the program ID RRN014.
 - Non-Residential Energy Services has the program ID RRN003 for the portfolio cycle ending in 2027. For the portfolio cycle beginning

⁴² RuralREN North Advice Letter #005-E/005-G

in 2028, Non-Residential Energy Services will have the program ID RRN015.

- The commercial program will now also serve agricultural and public sector customers and will be re-branded as the Non-Residential Energy Services program.
- The Finance program has shifted towards offering more technical support and shows a budget reduction from the 2024-2027 cycle.
- The WE&T program, now known as the Energy Career Education and Training program, was re-segmented into market support in 2026 and will remain in the market support segment in 2028-2031. The program will be expanded with more locally developed and offered trainings and shows a budget increase.
- The residential and non-residential programs will also scale up the reach of existing services and show increased budgets.

Table 9: Closed Programs from the 2024-2027 Cycle

Closed Programs from the 2024-2027 Cycle						
Name of Closed Program	Segment	Sector	Unspent Budget of the Closed Program	Total EE budget from the 2024-2027 cycle	Rationale for Program Closure	Underperformance and Remediation (If applicable, elaborate on what led to underperformance and why. Describe remediation efforts that were undertaken, results of those efforts, and over which timeframe.)

Closed Programs from the 2024-2027 Cycle						
RRN007	Codes & Standards	Codes & Standards	\$0	\$678,384	As noted in RuralREN North Advice Letter #005-E/005-G, because the NREN C&S program focuses on providing training, many of the activities aligned with the “upskilling of existing workers” are described in the WE&T program. To provide efficiencies in implementation, the activities described for the C&S program can be effectively implemented as a program element of the WE&T program.	No underperformance; remediation not applicable. Activities have been shifted to the WE&T program under the market support segment.

Table 8: New Programs in 2028-2032 Application Cycle

NREN will not be proposing new programs in the 2028-2031 program cycle, however, will make changes as outlined above in the program modifications section.

Table 10: New programs in 2028-2032 4-Year Application Cycle

New Programs in 2028-2032 4-Year Application Cycle			
Name of New Program/Placeholder Program	Segment	Sector	High Level Program Description/Purpose
n/a	n/a	n/a	n/a

Chapter 5: Portfolio Management

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

NREN’s overarching goals were established by considering NREN’s regional needs.

Rural, HTR, tribal, and underserved communities face barriers such as: lack of access to prior energy efficiency and decarbonization programs, distrust of non-local contractors, complicated participation processes, and limited awareness and education resources.

NREN’s business plan outcomes directly align with NREN’s overarching goals of: Equity, Energy Savings, and Access to Funding.

Equity: Ensuring rural, HTR, tribal, and underserved communities receive equitable access to CPUC programs, technical support, and local workforce opportunities.

Energy Savings: Providing measurable, persistent energy and GHG reductions through electrification, energy efficiency, and demand-reduction activities.

Access to Funding: Increasing rural communities’ ability to secure rebates, incentives, financing, and capital for energy upgrades.

For the goal of equity, the majority of NREN’s programs are in the equity segment. The following two outcomes directly support NREN’s equity goal:

- *Outcome 1:* HTR, low income, tribal, and underserved rural customers are provided with equitable levels of services and support from CPUC energy programs.

This outcome supports the equity goal of expanding equitable access to energy efficiency and electrification programs in under-resourced communities. NREN’s equity

programs target these audiences and are centered around delivering meaningful participation opportunities across NREN’s rural communities.

- *Outcome 2:* Equity customers are provided tools to better manage their energy use and costs through increased awareness, technical support resources, and access to a trained, local workforce to improve their homes and businesses.

This outcome supports equity by directing outreach efforts specifically to communities that are harder to reach and under-resourced. Direct outreach to these customers enables them to understand energy-saving measures, fuel substitution, and electrification, and better their energy consumption options. Additionally, NREN’s Energy Career and Training program will produce a skilled local workforce while the residential, non-residential, and public programs produce a customer network sufficient to support widespread adoption of electrification, weatherization, and load-flexibility measures and acceleration building decarbonization.

The following outcome is connected to NREN’s goal of Energy Savings:

- *Outcome 3:* Energy consumption, energy cost and GHG emissions are reduced across the region, contributing to California's decarbonization and energy efficiency goals.

This outcome is central to achieving NREN’s goal of measurable energy and demand reduction through electrification, weatherization, controls, and NMEC-verified multi-measure upgrades. In the long term, NREN aims to deliver persistent reductions in peak demand, building-sector GHG emissions, propane and delivered-fuel dependence, and energy burdens faced by rural households and small businesses.

The following outcome is directly related to NREN’s goal of Access to Funding:

- *Outcome 4:* Increased access to rebates, incentives, and financing to provide the capital needed in rural communities to enable investments in electrification and energy and demand reduction projects with persistent energy savings, GHG emissions reductions, and benefits to the grid.

This outcome is foundational to NREN’s goal of removing first-cost barriers, which is a major hurdle for rural residents, microbusinesses, public agencies, and tribal entities. In the short term, NREN will have deployed direct install pathways and incentives for electrification pathways. In the long term, NREN will enable customers to implement multi-measure energy efficiency projects that would otherwise be unattainable.

Table 11: NREN’s Goals and Strategies

Goals	Goal 1: Equity Ensuring rural, HTR, tribal, and underserved communities receive equitable access to CPUC programs, technical support, and local workforce opportunities.	Goal 2: Energy Savings Providing measurable, persistent energy and GHG reductions through electrification, energy efficiency, and demand-reduction activities.	Goal 3: Access to Funding Increasing rural communities’ ability to secure rebates, incentives, financing, and capital for energy upgrades.
Outcomes	Outcome 1: HTR, low income, tribal, and underserved rural customers are provided with equitable levels of services and support from CPUC energy programs. Outcome 2: Equity customers are provided tools to take action to better manage their energy use and cost through increased awareness, technical support resources, and access to a trained, local workforce to improve their homes and businesses.	Outcome 3: Energy consumption, energy cost and GHG emissions are reduced across the region, contributing to California’s decarbonization and energy efficiency goals.	Outcome 4: Increased access to rebates, incentives, and financing to provide the capital needed in rural communities to enable investments in electrification and energy and demand reduction projects with persistent energy savings, GHG emissions reductions, and benefits to the grid.

NREN’s unique value metrics highlight how the portfolio is moving towards the outcomes shown in the logic model, particularly when it comes to equitably serving the customers of rural Northern California. The UVMs demonstrate how NREN provides value to the customers that are historically underserved, such as customers that are geographically distant or rely on unregulated fuels. The UVMs measure the overall benefits of those customers receiving ratepayer funds in their communities and even show how the programs will help reach California’s GHG goals.

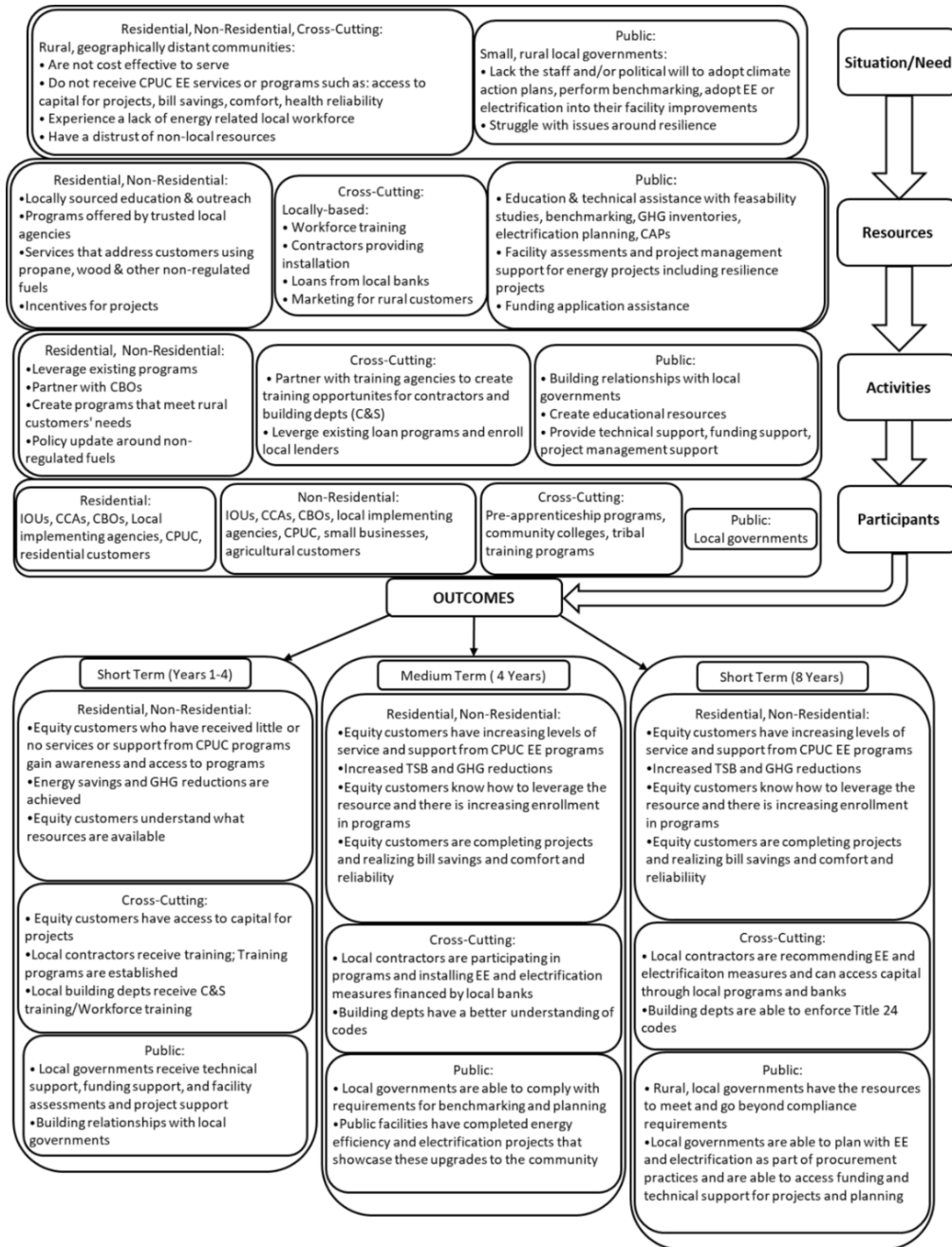


Figure 0-3: Logic Model

NREN’s UVMs highlight the additional benefits brought by RENs for filling service gaps and taking innovative approaches to achieving California’s EE goals. It is critically important that RENs are not held to the cost effectiveness threshold requirement and caps on equity and market support programs in order to continue serving that purpose. The Commission has repeatedly recognized that REN portfolios have different rules for exactly this reason—because their portfolios are smaller and have a specific purpose in filling gaps and serving HTR customers who are naturally less cost-effective to serve.⁴³ In the words of the Commission, “we continue to believe that application of an up-front threshold cost-effectiveness requirement for RENs... could thwart their main benefits.”⁴⁴ One of the important rules that apply to RENs is that they must propose metrics to demonstrate the unique value their portfolios bring.⁴⁵ NREN intends to show through the UVMs that customers historically left behind by traditional EE programs can receive services and contribute to GHG reductions and benefits to the grid when extra effort and innovative approaches are used in reaching them. When the additional benefits of the UVMs are combined with the TSB and savings achievements, it is clear that the services that NREN provides are effective and bring great value to the California EE portfolio. Figure 4 and Figure 5 below show a comparison between the distribution of services across NREN territory, comparing an annual average of PG&E services to NREN program services delivered in 2025. Figure 4 shows a higher clustering around higher-population areas like Sacramento, where Figure 5 shows the expansion of services by NREN into areas that have previously had limited access to EE programs, particularly in Lake and Mendocino counties.

⁴³ D.19-12-021 at 37.

⁴⁴ *Ibid.*, at 76.

⁴⁵ *Ibid.*, at 23.

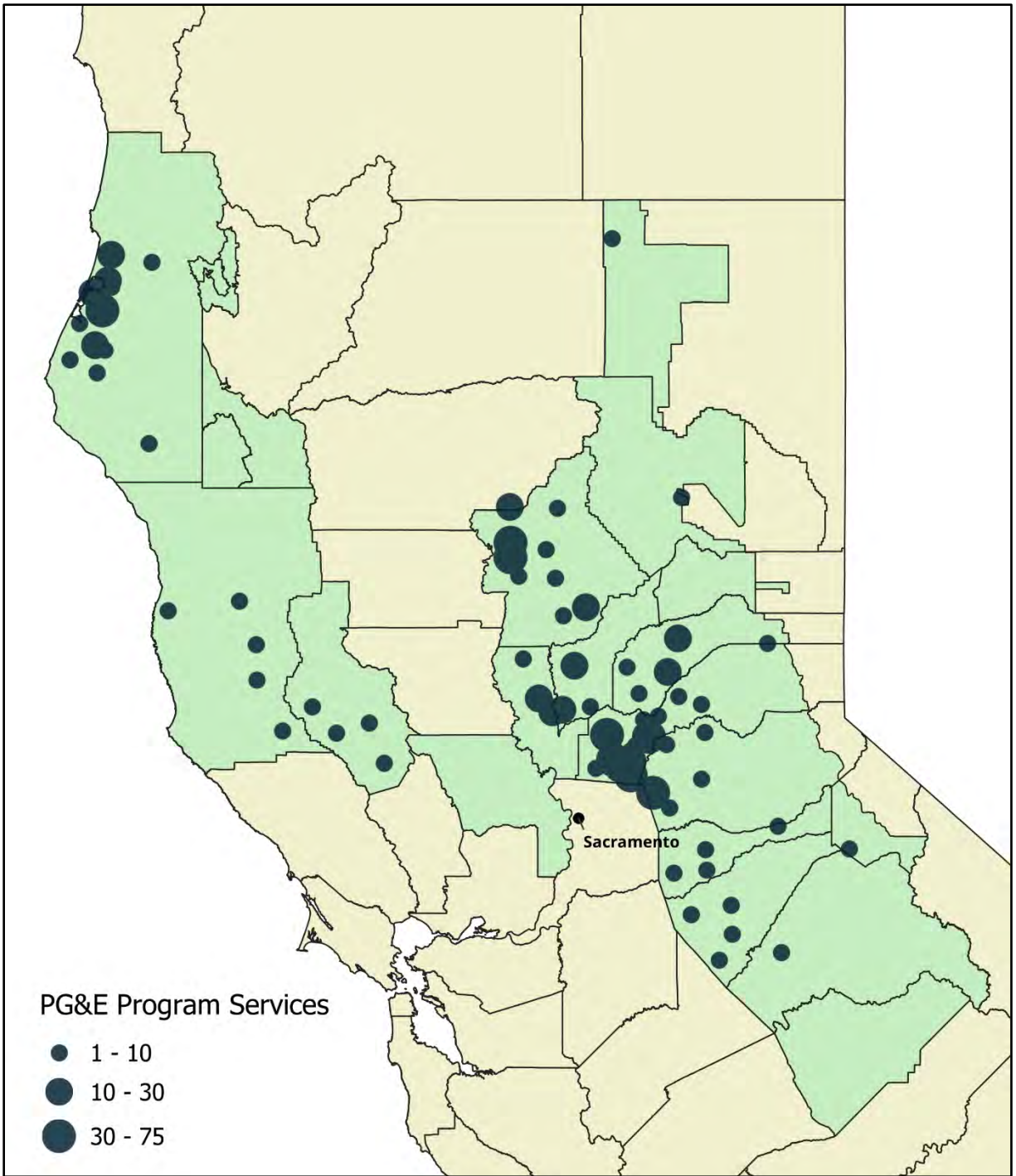


Figure 0-4: Map of one-year average of PG&E services delivered in NREN service territory

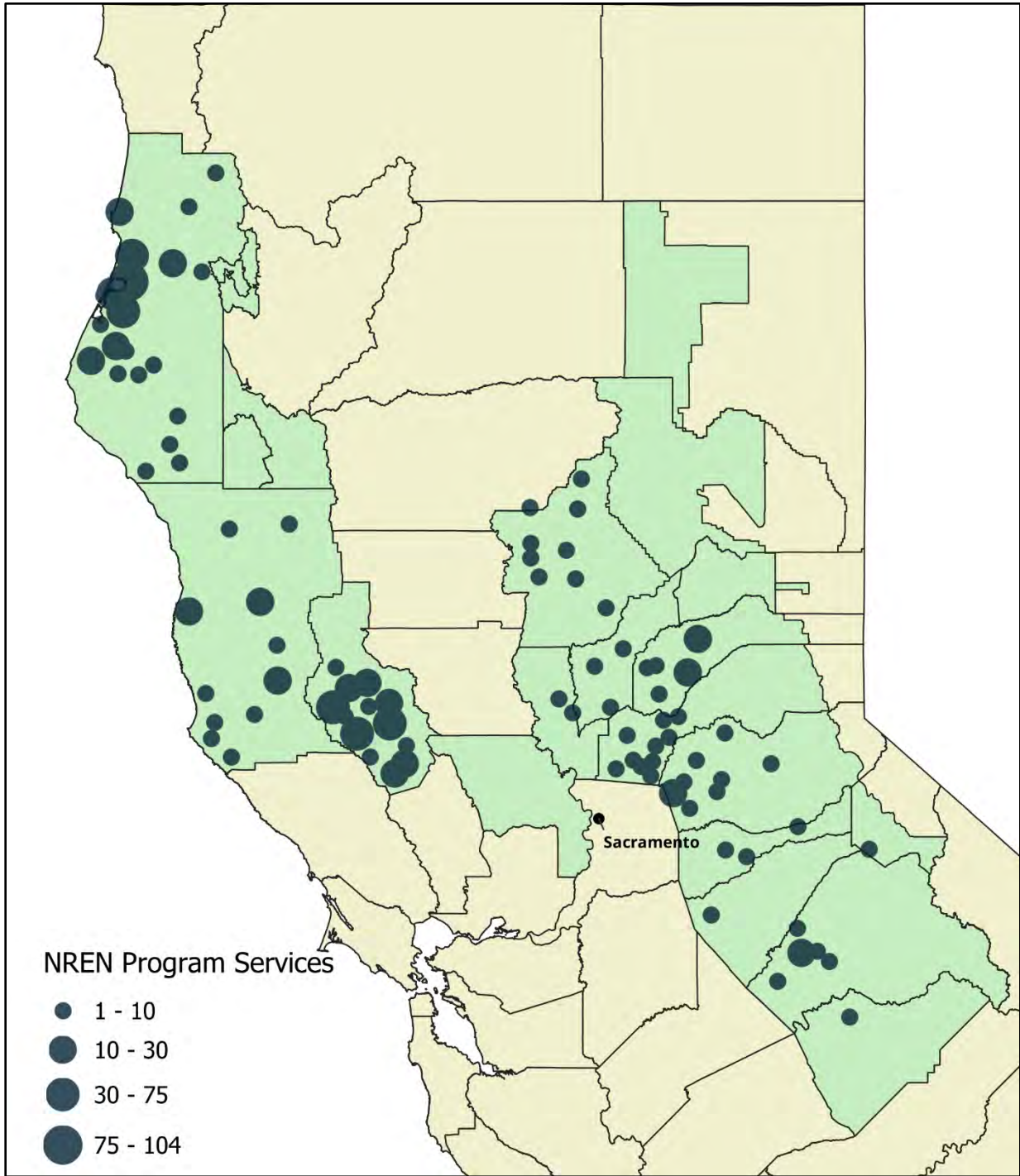


Figure 0-5: Distribution map of NREN program services delivered in 2025.

Table 12: UVM Overview and Reporting Approaches

Unique Value Metric (UVM)	Description of What It Measures	Tracking & Reporting Approach including targets where applicable	Strategic Importance to REN Portfolio
Number of customers within a geographic HTR area that engage with NREN's programs by sector (including but not limited to homes that engage with NREN's program offerings such as assessments, energy efficiency kits, rebates, technical support resources, etc.).	Services provided to customers that are outside of metropolitan areas, in tribal communities, or DACs.	This will be tracked by tagging each customer with the county they are in and whether or not that county is geographically HTR. This metric will be reported annually.	NREN intends to ensure customers are engaging outside of metropolitan areas, in alignment with NREN's overarching focus on rural customers.
Number of customers served by any NREN program that are within a zip code that has not received any EE services in that sector in the past five years.	Services reaching customers who have been historically underserved.	Data is received on historical services for the past five years by zip code and compared to services delivered by NREN. This comparison will be done annually.	NREN wants to ensure services are reaching customers who have not previously received services.
Percentage of residential customers that rely on propane or other unregulated fuel that engage with NREN's programs.	Demonstrates the need of NREN customers using unregulated fuels to receive services from PA programs.	Primary heating fuel will be tracked for cooking, water heating, and HVAC for customers that engage in a phone-based or in-person home energy assessment. Data will be reported annually.	NREN wants to ensure customers with unregulated fuels also receive services.

Unique Value Metric (UVM)	Description of What It Measures	Tracking & Reporting Approach including targets where applicable	Strategic Importance to REN Portfolio
Total avoided emissions (tons of CO2) from unregulated fuels use saved through NREN residential programs.	Shows the additional value of NREN programs to reduce overall emissions in California whether or not the fuels are regulated.	For measures that lead to a reduction in the use of unregulated fuels, the GHG savings will be calculated.	Shows NREN’s progress towards California’s GHG reduction goals.
Percentage of total census tracts engaged within NREN region in each sector.	Demonstrates how NREN is working to ensure services are equitably offered to customers throughout the territory.	Customers served will be tagged with census tract (this is required for other metrics) and each tract served will be tracked as the numerator. Denominator is total number of census tracts in NREN territory.	NREN wants to ensure that all territories receive engagement and the offer of services.
Total vehicle miles traveled to deliver services in residential sector.	Demonstrates the vastness of the geographic region served by NREN and how NREN overcomes this distance to provide services.	Miles traveled will be tracked through mileage reimbursement requests submitted by staff or CBOs when traveling to provide in-person services to customers.	NREN wants to ensure all customers are reached regardless of distance, and this metric collects data to show how reaching rural customers may require additional time and costs for travel.
Ratepayer funds returned to the	Demonstrates how NREN brings value	Funds associated with incentives, loans,	NREN wants to ensure rural

Unique Value Metric (UVM)	Description of What It Measures	Tracking & Reporting Approach including targets where applicable	Strategic Importance to REN Portfolio
community through incentives, education and training programs, contractor stipends, loans, energy kits.	to customers who have historically paid into the PPP but perhaps may not have seen the benefits invested back in their community.	installed measures, energy efficiency kits, contractor stipends, and workshops delivered in NREN region will be tracked, whether or not the service was paid for by NREN or another PA.	ratepayers receive the benefits of funds paid into the PPP.

Strategies to optimize portfolio and manage risk

Approach to use of goals and metrics for portfolio optimization

For maximizing portfolio performance, the approach described in NREN’s December 2024 Updated Business Plan (RuralREN North Advice Letter #003-E/003-G), remains relevant today: the foundation of NREN’s management and optimization of its portfolio is based on a comprehensive set of goals and metrics described in this BPA, and grounded in the following principles:

- **Visibility and Transparency:** Publish metrics and progress to goals regularly and frequently. Ensure all team members have access to reports and dashboards. Report status and forecasts to NREN Governing Partners at regular meetings and discuss possible course corrections.
- **Data Analysis to Quickly Identify Trends:** Use automated programs and portfolio databases to produce performance summaries. Understand what tactics and

strategies are working and where possible corrections or program design modifications are needed to improve performance.

- Forecasting that Considers Market Trends: Proactively account for changes in market conditions that may affect program performance. Examples of market trends could include economic trends such as inflation and unemployment.
- Flexibility to Use Additional Metrics or Goals as Needed: NREN’s proposed set of metrics and goals should be adequate to manage portfolio performance, but other proxies or indicators may be identified during implementation that may improve forecasting accuracy or better describe program performance.

NREN’s Lead Portfolio Administrator, RCEA, brings expertise in portfolio management from their Elect to Administer PA experience, and both RCEA and SBC bring experience in program management from their Local Government Partnership work. The County of Yolo has also run sustainability programs for many years. With this prior experience guiding the Governing Partners, NREN is well-positioned to manage its portfolio toward goal achievement.

NREN’s approach to managing its portfolio begins with the establishment of goals and outcomes (scope), schedules, and costs. These parameters become the program management triangle used by the management team to inform their segment or sector portfolios. Tracking and reporting systems are used to gather and consolidate program results, costs, and schedules, which in turn will be used to produce dashboards and reports of performance in real-time that will show performance compared to goals.

This approach is being implemented now, as programs continue to ramp up in 2026 following initial launch of NREN activities in 2025. Over the past year, NREN has been developing tools and procedures for its portfolio administration team to better manage

portfolio, segment, sector, and program level performance to achieve targets set for the current 2024-2027 portfolio period.

In parallel, NREN's Governing Partners have collaborated to set targets for the new 2028-2031 portfolio. While REN PAs are not subject to traditional cost-effectiveness requirements,⁴⁶ the NREN Governing Partners have taken an intentional approach to goal setting for this BPA to ensure the portfolio will deliver benefits to ratepayers. Community needs are analyzed through the lenses of Commission objectives and strategies as described in Chapter 3 and inform intended outcomes for the portfolio. Key performance indicators are developed to measure progress toward realizing those outcomes, and the program and portfolio design process aligns staffing and planned program expenditures directly with those KPIs.

Tracking progress to stay on target with those KPIs and program outcomes relies on operations procedures, IT systems, program controls, program forms and agreements, and tracking and reporting results and metrics.

Performance Monitoring and Risk Management

NREN mitigates risk of underperformance at the portfolio level by (1) conducting ongoing program performance reviews to identify needs in portfolio realignment, (2) implementing program budget changes to address program performance, (3) resetting program operations to maintain program delivery, (4) reconfirming existing joint collaboration with other PAs and their Implementers to support ongoing collaboration and (5) coordinating with the CPUC on needed programmatic or policy changes.

NREN is currently developing and deploying a customer relationship management software platform that will be implemented in 2026 by the Lead Portfolio Administrator,

⁴⁶ See D.12-11-015 COL 14; D.19-12-021 at 37-38; D.21-05-031 COL 8 and 9.

RCEA, to monitor performance and manage programs. Program reports and dashboards will quickly identify metrics and indicators that are deviating from plan, and program and portfolio managers will be expected to develop a recovery or cure plan to get back on target. Sector, segment, and portfolio management work together to consider corrective actions.

Forecasts are reviewed, and if necessary, updated at least quarterly (depending on the program). As described previously, NREN’s portfolio management approach begins with the establishment of goals and outcomes (scope), schedules, and costs, which form the program management triangle parameters to ensure program performance. When performance monitoring indicates changes are needed in any of the three program triangle variables, re-planning of portfolio variables at the sector, segment, and portfolio levels is triggered.

Program changes can also be made for reasons other than underperformance, such as proactive adjustments to optimize portfolio delivery and outcomes. For example, NREN recently consolidated its C&S program activities into the ECE&T program to reduce administrative burden and streamline program delivery in anticipation of program launch. In tandem, the ECE&T program was re-segmented from equity to market support, as the primary purpose of both WE&T and C&S activities is to build a motivated and capable supply chain of market actors to support high-quality and code compliant energy efficiency installations in the region.⁴⁷

Portfolio management procedures, including those addressing course corrections, are described at a high level in the section above. Detailed procedures for program management and controls, including thresholds and delegation of authority are described in the MOA and bylaws of the Governing Partners. The Lead Portfolio

⁴⁷ RuralREN North Advice Letter #005-E/005-G

Administrator, RCEA, is in a contractual relationship with each implementer, through which each implementer receives their budgeted funds for implementation and program delivery. Each program is assigned a lead staff member, and their agency (Program Lead) becomes accountable in the task orders for program reporting and performance.

In cases of underperformance of a program, sector, or segment, the related Program Lead would be required to address the performance issues utilizing the course corrections described in the above section. The program changes would be made under the guidance of RCEA as the Lead Portfolio Administrator through the implementation contracts; any changes in strategy or Program Lead agency would require approval of the Governing Partners. A monitoring plan would be put in place and milestones set to check back in with program performance during set intervals aligned with reporting dates. If the program continues to underperform, it would be considered for closure. This decision would be evaluated very carefully by the Governing Partners to ensure that the portfolio's goal to bring services to rural customers can still be met.

Similarly, for sector or segment-wide performance issues, the programs would be evaluated to determine if services can be shifted across programs to increase metrics in that sector or segment. Those programs would then follow the monitoring plan and closure procedures described in the corrective actions for programs.

As previously described in NREN's December 2024 Updated BP, the following key areas of flexibility are needed to ensure overall portfolio goals are achieved:

- *Scope:* By reviewing program performance in the previous portfolio cycle and feedback from customers, NREN can be nimble in its approach to achieving its goals. This requires flexibility when it comes to outreach methods, delivery approach, service levels, and most importantly, incentive levels. NREN will analyze

incoming data to be proactive as well as reactive to customer needs and program pivots needed for success. To ensure programs can be adaptive, there must be flexibility with subcontractors, partners, and measures. NREN will stay on track with its overarching goals but may adjust KPIs across programs, sectors, and segments if they are found to not be aligned with those goals. Program changes will be documented in updated Program Management Plans that are kept internally, and Implementation Plans filed for the public.

- *Service Territory*: NREN intends to study the market and needs of additional Northern California counties (Shasta, Tehama, Glenn, and Colusa) that are not currently part of the service territory. However, should the outcome of the study show the need and ability to provide services, NREN may adjust the service territory to include those counties in some programs.
- *Cost (Budget)*: NREN put great effort into ensuring that the budget request for this portfolio cycle will lead to the outcomes proposed. However, this may require shifting funds across programs, sectors, and segments. The results from the Market Characterization and Needs Assessment may lead to changes in emphasis across programs. Changes to the budget will be captured in monthly reporting and updated Implementation Plans.
- *Time (Schedule)*: This BPA does not require a detailed implementation schedule and NREN understands that monthly, quarterly, or annual milestones may change within the overall program authorization cycle. NREN will remain flexible with the timing of milestones but will work to keep program development and implementation on track.

Program-specific closures and modifications are detailed in Chapter 4, in the section on Program Modifications from 2024-2027 portfolio cycle. Those program changes are

implemented proactively to streamline portfolio management and reduce administrative burden and are not due to program performance.

Procurement Practices

RCEA, as the Lead Portfolio Administrator for NREN, applies years of experience as a CCA and ETA PA to its responsibility for managing portfolio-wide procurement and contracts and providing oversight of budgets, among other key portfolio administration tasks. NREN portfolio-wide procurement will adhere to RCEA's established procurement processes as a public agency.

As an overall guiding principle, NREN endeavors to build capacity among its Governing Partners and supporting agencies to deliver its portfolio. This means that, to the greatest extent that is practical, NREN performs its own forecasting and implements its own programs. This practice creates family- and community-sustaining career opportunities locally and mitigates procurement-related risks. Program implementation benefits from the commitment of local workforce driving tangible outcomes in their own communities.

To mitigate risks that could arise from relying solely on local workforce and skill availability, NREN balances its self-implementation principles with targeted procurement of other program and portfolio implementation services—especially in early phases of program launch and ramp-up. NREN will, through the processes and tools described earlier in this section, continuously monitor agency staff and third-party provider performance in delivering program outcomes and the costs associated with different approaches, to mitigate risks and implement corrective action where needed.

Statewide Assessment

NREN was an active participant in the OP 2 of D. 23-06-055 Statewide Energy Efficiency Program Assessment Criteria Working Group. The IOUs drafted a proposal in the

summer of 2025, then invited non-IOU PAs to participate in these efforts after a draft proposal was created. PG&E led the working group of participating PAs to refine the IOU developed proposal for evaluating EE programs and to identify issues that the Commission would potentially need to address as part of this process. NREN, along with the other participating PAs, responded to PG&E's survey to explain whether or not it agreed to the draft proposal that resulted from the Working Group efforts.

The resulting assessment process is attached in Exhibit 4.

While NREN appreciates the efforts that went into the proposed assessment process, NREN has qualified support for the proposal. At this time, NREN believes the assessment process was not adequately designed to equitably and efficiently assess the statewide program portfolio. The proposal asks a series of questions to assess a program; however, it is unclear how these questions could be answered objectively and what the source of evidence will be. Additionally, the assessment asks if regional equity programs would be better suited as statewide programs. This dismisses the gap-filling purpose of RENS, and the very reasons RENS were created in the first place. Since many REN territories are HTR, it is unclear how a statewide delivery could provide better consistent access than a regional program.

NREN 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. NREN's programs are equity-focused to address the specific needs of its rural communities. If a regional program were to be expanded to a statewide program, it is possible that NREN's rural, HTR communities would not have the same level of access to the program as they would if the program were regional. Additionally, regional programs differ from each other as they are designed to address unique needs specific to their region.

Upleveling regional programs to statewide programs might mean regional needs are not being met, leaving behind equity communities.

NREN believes this should be kept in mind during the assessment process and not be overlooked.

NREN would also like to note that the Joint Cooperation Memorandum (JCM) process is the Commission-ordered existing mechanism to prevent harmful program overlap and ensure PA coordination and program complementarity. These JCMs and other means of coordination should be taken into account when conducting an assessment. In its disposition letter to the Joint PAs’ OP 32 advice letter (SoCalREN Advice Letter 20-E/20-G et al.) the Commission reaffirmed the importance of JCMs and other existing coordination and program documentation processes in avoiding risk to ratepayers from program overlap or duplication.⁴⁸

Chapter 6: Segmentation and Sector Strategy

Portfolio Sector Strategy

Commercial

NREN’s commercial sector will be served by the Non-Residential Energy Services program with a focus on small HTR businesses, tribal facilities, and non-profit and CBO buildings. In NREN’s rural territory, many commercial properties are comprised of renters who have limited funds for energy upgrades. Renter-occupied buildings limit a tenant’s ability to invest in weatherization, electrification, or equipment upgrades. Small businesses and public agencies also operate with limited funds or no dedicated energy

⁴⁸ Advice Letter 20-E/20-G et al. Energy Division Disposition Letter dated June 30, 2025, subject “Tier 2 Advice Letter Filed by Southern California Regional Energy Network on Behalf of the Energy Efficiency Portfolio Administrators for Program Overlap Analysis” at 8-9.

staff, particularly in smaller jurisdictions where there is low capacity to pursue energy efficiency projects. These challenges are compounded by the scarcity of qualified contractors, long travel distances from service providers to vendors and customers, and higher project costs associated with serving remote regions. To address these barriers, NREN will target non-residential facilities that serve equity populations, such as tribal community buildings, rural clinics, and nonprofit buildings, to ensure that its commercial portfolio delivers both energy savings and community benefits.

NREN's Non-Residential Energy Services will also serve the agricultural sector by providing controls and automation to allow those customers to take advantage of sector specific rates.

This program will coordinate with NREN's Public Energy Services, Energy Upgrade Financing, and Energy Career Education and Training programs to develop a group of participating contractors who are trained in program requirements to provide services directly to customers as well as provide funding support. NREN will conduct outreach and needs assessments with commercial and public sector customers to help contractors reach customers. In the short term, this will lead to a greater adoption of electrification and EE technologies by small businesses and other non-residential facilities. In the long term, there will be increased opportunities for more energy contractors, and the increase in EE technologies will allow commercial and non-residential facilities to operate at lower costs and provide better service to customers.

Finance

Barriers of first cost, access to capital, and removal of federal tax credits and incentives remain the biggest impediments to higher adoption rates of electrification and energy efficiency measures, especially in low- and moderate-income areas. NREN's Energy

Upgrade Financing program will work to address these needs through the following programming.

NREN intends to work closely with the California Alternative Energy and Advanced Transportation Financing Authority's (CAEAFTA) GoGreen Financing (GGF) team to increase awareness of existing lower-than-average interest rates for energy efficiency retrofits and equipment in the region. Current uptake of GGF in the NREN region is lower than the statewide average in most counties. As GGF requires a GoGreen verified contractor to implement projects, NREN will work to onboard local NREN contractors to be certified. Additionally, NREN is working to recruit local lenders to leverage the state-sponsored loan loss reserve through GGF to provide better-than-average terms to NREN customers via financial institutions local customers know and trust. NREN will provide technical assistance to customers wanting to leverage GGF products across residential, commercial, agricultural, and public sectors. NREN will work with the GGF marketing team to coordinate marketing efforts across the territory and be the trusted messenger to increase awareness and adoption.

In addition to increasing local awareness of GoGreen products, NREN is currently determining eligibility to provide microloans (less than \$2,500) to residential customers. These microloans would likely be primarily used to purchase energy-efficient appliances rather than larger installations requiring a contractor or permitting. Target customers would be low-income residents with a need to build personal credit. The loan amounts are expected to be below currently available financing products (\$5,000) and would carry low or zero interest and fees. NREN is considering other opportunities to directly fund energy efficiency projects in the public sector through On Bill Financing (OBF) Bridge Loans and public sector grant programs. These concepts require more review to understand feasibility and eligibility of use.

By removing first cost barriers, NREN intends its finance strategy to 1) increase participation in NREN’s residential, non-residential, and public programs; 2) reduce turnover from project ideation to completion; 3) increase local resources for financing in NREN’s HTR and rural region; 4) increase participation in existing energy efficiency and electrification loans programs; and 5) drive more comprehensive energy projects.

Workforce, Education & Training

NREN’s Energy Career Education and Training program will facilitate access to career opportunities in clean energy-related markets for individuals in rural HTR, underserved, and low-income communities. Additionally, at the end of 2025, NREN closed its C&S program and incorporated the activities into the ECE&T program. NREN will leverage existing training programs to upskill the workforce and expand career pathway opportunities to support market demand. NREN will use multifaceted outreach activities throughout the region, including targeted campaigns to work with underrepresented populations and multilingual outreach and training opportunities to expand the workforce.

NREN’s Energy Career and Training program targets contractors, building officials, students, job seekers, tribal members, and geographically remote populations. NREN will upskill local contractors in electrification, heat pump technologies, building envelope strategies, and energy code requirements, while also promoting and assisting participation in existing certification opportunities. NREN will work closely with high schools, community colleges, tribes, educational institutions, and CBOs to expand career pathways, develop curriculum, and create pre-apprenticeship, internship, and on-the-job learning opportunities that connect trainees directly to employers. The program will also build a regional network of industry professionals who advise on training design, mentor participants, and host job placements, which will ensure that rural communities

have a reliable, local workforce capable of meeting current and future clean energy labor demands.

Public

The Public Energy Services program is a public agency-focused program to help HTR, disinvested, and underserved public agencies by providing access and information on energy efficiency opportunities. The program will focus on building relationships, data collection, assessments, education, and technical support to bring energy savings to public sector customers. It will also move customers toward accessing external programs and funding opportunities. NREN's jurisdictions tend to not have dedicated sustainability or energy staff, and therefore a low capacity to pursue funding opportunities and programs. To combat this, NREN's Non-Residential Energy Services program will use direct personal engagement with local staff that understand local concerns and needs to provide services to these jurisdictions

NREN's Public Energy Services program will provide support to agencies that have traditionally been underserved by other programs. The delivery approach of serving primarily rural public agencies is innovative because it will result in new customer engagement with local elected officials and staff, ultimately resulting in the implementation of energy efficiency projects at public buildings.

Residential

NREN is proposing two programs in the residential sector, both in the equity segment: The Home Energy Advisors program will cover outreach and education, and the Home Energy Upgrades program will focus on achieving installation of measures for Equity customers.

The Home Energy Advisors program will provide outreach and energy awareness through a community-based approach that builds energy literacy among rural residential customers. NREN supports residents in understanding their own energy behaviors and the building envelopes of their homes through educational opportunities, broad community engagement at events, libraries, farmers' markets, CBO networking gatherings, and the distribution of energy efficiency kits that include basic energy efficiency and weatherization measures along with energy monitoring tools. NREN also offers individualized home energy assessments, currently delivered virtually, which have proven effective in expanding access for HTR and underserved households; future onsite assessments will provide an opportunity for deeper engagement. Together, these activities serve as a pathway to affordable, reliable and decarbonized energy solutions, guiding customers toward equitable access to incentives, financing, and advanced energy upgrades available through NREN and third-party program implementers.

The Home Energy Upgrades Program will focus on addressing the many challenges that rural Californians face, including higher than average energy burdens, aging homes, distance from large vendors participating in midstream programs, and limited availability of contractors.

Due to the wide geographic distribution of NREN equity customers, a user-friendly downstream rebate offering will be available for many homeowner-installed energy efficient appliances. Higher rebate amounts will be available for equity customers and fuel substitution measures. Because equity customers can often incur extra charges when cashing checks, the program will utilize an electronic payment system where customers can choose from multiple payment delivery options that are fast and have no hidden fees.

For more complex and expensive measures, such as HVAC, HPWH, and weatherization, the Home Energy Upgrade program will offer a direct install option. NMEC will be used to capture savings when feasible with data acquisition and other restrictions. The program will support small local contractors with easy-to-navigate requirements and processes. The customer will select from a list of eligible participating contractors, or the contractor can bring the project directly to NREN. Incentives will be paid directly to the contractor with the requirement that savings are passed along to the customer. Contractors will be required to be familiar with programming requirements and will be provided training on administrative needs. Additional contractor training will be provided through NREN’s Energy Career and Training offerings. Incentive levels will be set to encourage multiple measures in a project, particularly focusing on pairing HVAC improvements with weatherization to address affordability concerns. NREN staff will work with homeowners to layer incentives with other non-PPP funded federal, state, and local incentive programs.

Table 13: Budget Distribution by Sector

Budget Distribution by Sector (\$000)									
	Sector								
Budget	Residential	Commercial	Industrial	Agricultural	Public	Cross-Cutting	EM&V	Portfolio Support	Total Budget
2028	\$747,675	\$4,330,495	\$0	\$0	\$6,787,098	\$3,199,809	\$1,330,442	\$2,296,352	\$18,691,870
2029	\$816,462	\$4,792,107	\$0	\$0	\$7,567,475	\$3,405,404	\$1,398,284	\$2,431,829	\$20,411,562
2030	\$949,618	\$5,471,585	\$0	\$0	\$9,716,404	\$3,565,168	\$1,467,302	\$2,570,377	\$23,740,453
2031	\$1,071,679	\$6,548,507	\$0	\$0	\$11,191,070	\$3,730,081	\$1,538,306	\$2,712,343	\$26,791,987
Total (4-Year)	\$3,585,435	\$21,142,694	\$0	\$0	\$35,262,047	\$13,900,462	\$5,734,334	\$10,010,901	\$89,635,872
2032	\$12,310,177	\$7,203,358	\$0	\$0	\$2,983,577	\$4,103,089	\$1,178,847	\$1,920,207	\$29,699,255
2033	\$12,925,685	\$7,563,525	\$0	\$0	\$3,132,756	\$4,308,244	\$1,237,790	\$2,004,814	\$31,172,815
2034	\$13,571,970	\$7,941,702	\$0	\$0	\$3,289,394	\$4,523,656	\$1,299,679	\$2,093,651	\$32,720,052
2035	\$14,250,568	\$8,338,787	\$0	\$0	\$3,453,864	\$4,749,839	\$1,364,663	\$2,186,930	\$34,344,651
Total	\$53,058,400	\$31,047,371	\$0	\$0	\$12,859,592	\$17,684,828	\$5,080,980	\$8,205,602	\$127,936,772

Budget Distribution by Sector (\$000)

(4-Year)									
Cumulative Total (8-Year)	\$56,643,835	\$52,190,065	\$0	\$0	\$48,121,638	\$31,585,290	\$10,815,313	\$18,216,503	\$217,572,645

Portfolio Segmentation Strategy (RA, MS, E, C&S)

Resource Acquisition

While NREN will not have any programs within the resource acquisition segment for the portfolio cycle 2028-2035, its equity and market support segments will utilize resource acquisition strategies. Because rural communities have historically received minimal participation in IOU EE programs and rely heavily on propane, NREN’s RA strategy focuses on electrification pathways that support TSB goals and reduce long-term energy burdens. NREN prioritizes the use of downstream rebates, participating-contractor direct install, and NMEC-verified whole-home and whole-facility upgrades, ensuring customers can implement deeper, multi-measure projects. These strategies are supported by NREN’s Energy Career Education and Training program and Energy Upgrade Financing program, which encourage RA-eligible installations such as heat pumps, HPWHs, envelope improvements, and high-efficiency appliances.

Additionally, NREN’s residential, non-residential, and public sectors will also support the resource acquisition segment. NREN’s residential programs will increase the number of electrification upgrades and NMEC whole-home projects completed in NREN’s region. Non-residential and public facilities will receive energy audits and project development assistance, enabling deeper retrofits. To maximize cost-effectiveness and address rural market diversity, NREN deploys a mix of Strategic Energy Management (SEM), NMEC, deemed measures, custom calculations, and direct install across sectors. Through this

integrated approach, NREN is supporting the goals of the resource acquisition segment to deliver robust savings, high TSB, and equitable access to deep decarbonization across NREN’s rural territory.

Market Support

NREN’s Energy Career Education and Training program is segmented as market support, and NREN’s equity programs also utilize market support strategies to meet the MS sub-objectives:

Sub-Objective #1: Demand

NREN increases demand for energy efficiency and electrification upgrades through education, market awareness, and community-based engagement, especially in rural, tribal, and underserved communities that have historically lacked access to energy efficiency information. Key activities for NREN to achieve this sub-objective include:

- Educating contractors on electrification technologies and rural-appropriate energy efficiency measures.
- Energy Advisor services that provide energy usage education and IDSM linkages to customers, including resources for energy storage and solar.
- Community-driven outreach using trusted local organizations, including CBOs, tribal governments, and county agencies.
- Energy efficiency kits and other direct-engagement tools that raise awareness and energy savings opportunities.
- Targeted marketing to propane users, small businesses, and public/tribal facilities to increase awareness of electrification benefits.

Sub-Objective #2: Supply

NREN’s strategy for sub-objective 2 is to focus on building and expanding the local rural contractor ecosystem, a significant barrier to energy efficiency adoption within NREN’s region. Key activities for NREN to achieve this sub-objective are:

- Upskilling the rural workforce by training contractors on heat pump installation, heat pump water heater and electrification approaches, weatherization and envelope improvement, NMEC protocols and documentation, and energy code requirements.
- Partnering with community colleges, tribal training programs, and WE&T experts to strengthen the supply of skilled labor.
- NREN also works with local vendors to educate them on available incentives to help encourage them to make available more energy efficient appliances and equipment.

Sub-Objective #3: Partnerships

NREN will build partnerships with organizations to provide training to contractors and building professionals, in order to extend trust, reduce costs, and connect customers to opportunities they would not access independently. NREN’s goal is to create a customer base that understands the importance of energy efficiency and create a workforce that can meet the needs of the customers and supply energy efficiency activities. Key activities for NREN to achieve this sub-objective are:

- Partnerships with organizations to provide training, including trade schools, community colleges, and statewide WE&T and C&S providers.
- Working with CBOs, counties, tribes, and local governments for community-based outreach.
- Partnering with CBOs and local contractors to provide energy efficiency services.

- Providing workforce development/training resources and stipends for CBO staff and local contractors.

Sub-Objective #4: Innovation and Accessibility

NREN advances innovation by making emerging electrification and EE technologies accessible to rural customers, where supply limitations and installation barriers are prevalent. Key activities for NREN to achieve this sub-objective include:

- Ensuring there are trained contractors to install EE and electrification products, including heat pumps, HPWHs, smart controls, and envelope upgrades.
- Using downstream rebates, direct-install channels, and NMEC to expand access to innovative technologies.
- Providing remote assessment tools, overcoming geographic distance and broadband constraints.
- Supporting compliance with new Title 24 standards, which accelerate adoption of low-carbon technologies.

Sub-Objective #5: Access to Capital

NREN will support rural customers in reducing financial barriers, which is a major factor in preventing the completion of EE and electrification projects. Key activities for NREN to achieve this sub-objective are:

- Trained contractors gaining access to NREN programs that offer incentives and support with loans.
- Helping contractors enroll in non-NREN programs such as GoGreen Financing.

Sectors for MS Segment

NREN's Workforce, Education, & Training sector is categorized in the market support segment, however, all of NREN's programs will support the market support segment

across residential, non-residential, and public sectors. NREN’s Energy Career Education and Training program is designed to serve all sectors by training contractors and building professionals in electrification and EE technologies. The Energy Career Education and Training program will develop and expand career pathway opportunities for HVAC contractors, general contractors, plumbers, trade professionals, educators, and trainers to support market demand and increase the skill and availability of the trained workforce. While NREN’s market support program will not directly serve customers in single family and manufactured homes, NREN’s residential programs support the market support segment by training residents on the importance of energy efficiency, thus increasing the market demand. Altogether, NREN’s programs coordinate with one another to create a demand for energy efficiency measures and training the workforce to supply that demand.

Equity

Reaching equity customers is a top priority for NREN. NREN’s strategy for the equity segment includes a portfolio that is designed to deliver EE and electrification benefits to HTR, low-income, tribal, underserved, and rural communities in alignment with the Commission’s ESJ Action Plan goals to increase equitable access to clean energy, improve affordability, and expand community participation in CPUC programs.

NREN’s strategy reflects long-standing evidence showing rural customers face structural barriers, including high travel distances, contractor shortages, limited access to past IOU programs, and disproportionate reliance on non-regulated fuels such as propane. As a REN, NREN fills gaps where IOU programs have historically not reached rural customers. This equity segment strategy ensures that underserved groups not only access services but are able to progress from awareness to participation to deep efficiency upgrades, supporting both equity and resource acquisition outcomes.

To reach customers who have historically been underserved, NREN will partner with a wide range of trusted local entities, including but not limited to CBOs, tribal governments, local nonprofits, public education outreach centers, and faith-based organizations. This targeted outreach will reduce distrust, language barriers, and unfamiliarity with CPUC programs that have stood in the way of successful penetration in the past. When customers learn about programs through trusted entities, they are more likely to take action and complete projects, advancing both equity and resource acquisition goals. NREN’s equity strategies explicitly target rural constraints that impede both equity and RA success. NREN will target the high reliance on propane and delivered fuels within its region, as well as the extreme geographic isolation requiring remote assessments and low- or no-cost upgrades. NREN’s strategy is to reach customers where they are. This includes a combination of local education and outreach activities focused on in-person events, working with local decision makers, public agency staff and community-based organizations to get the word out about, and increase uptake of, our energy efficiency programs.

Equity Definitions

NREN frequently references the definitions for HTR and feels the requirements are clear. However, there are challenges with using the HTR definition. For example, collecting the information required to categorize a customer can be difficult because of reliance on customer self-reported information. Also, the geographic restrictions of HTR can disqualify communities around the Sacramento area even though they are still very isolated and rural, due to the fact that their entire counties are included in the

metropolitan statistical area.⁴⁹ For these reasons, NREN recommends using the underserved geography in addition to the HTR geographic definition.

The definition of DAC does not need further clarification since there is a mapping tool and readily available data at the census tract level. NREN appreciates that the definition for DAC has been expanded to include tribal lands as there are very few Cal-Enviro Screen defined DACs in NREN territory otherwise. NREN recommends that the definition of DACs be extended to not only include the factors in the Cal-Enviro Screen to better address air quality factors. Since air pollution is used to score communities and air quality is generally better in Northern California, communities in the region are still affected by other forms of environmental pollution from resource extraction and wildfires, and they tend to have lower incomes, and poorer health outcomes.⁵⁰ Another consideration would be to include communities disproportionately affected by climate-related natural disasters.

The definition of Underserved requires combining different sources of information and would benefit from refinement or clarification, as well as a GIS tool to make it easier to identify by census tract since that will be the geographic data that PAs are collecting. The definition could also include the areas that have not previously received services from CPUC funded energy efficiency programs using CEDARS data by zip code or census tract.

Sectors for Equity Segment

NREN's equity segment will serve the residential, commercial, and public sectors.

⁴⁹ <https://censusreporter.org/profiles/31000US40900-sacramento-roseville-folsom-ca-metro-area/>

⁵⁰ Lewis, Kristin, et al. Well Being in Rural California 2023. NeighborWorks America. <https://ssrc-static.s3.amazonaws.com/moa/Rural%20California%202023.pdf>

Within the residential sector, NREN’s Home Energy Services and Home Energy Upgrades programs serve the equity segment. The Home Energy Advisors program serves rural and underserved households by increasing energy awareness and supporting energy-saving behaviors by providing energy efficiency kits, energy assessments, educational opportunities, and energy advisor–led technical assistance, including bill and energy usage analysis, tool lending, project support, and connections to IDSM resources such as EV charging, solar, battery storage, and demand response. The Home Energy Upgrades program meets customers where they are with multiple delivery channels, including downstream rebates for energy efficient electric appliances, a participating contractor direct install program for heat pumps, HPHW, and building envelope, and an NMEC program for a comprehensive multiple measure approach. Program outreach will be focused on rural HTR customers who have not been able to participate in traditional EE programs.

Within the Commercial sector, NREN’s Non-Residential Energy Services program will target multi non-residential sectors, including small HTR businesses, public and tribal facilities, and non-profit and CBO buildings. This program will concentrate on non-commercial outreach to facilities that serve equity populations.

Within the public sector, NREN’s Public Energy Services program serves rural public agencies by providing equitable access, expertise, technical assistance including benchmarking, energy assessments, and funding assistance that will facilitate and advance project implementation.

Additionally, NREN’s Cross-cutting Energy Upgrade Financing program will equitably support the residential, SMB, and public sectors in NREN communities through low and no cost loans that will encourage and accelerate the implementation of energy efficiency projects.

Codes & Standards

At the end of 2025, NREN closed its Codes & Standards Program and shifted C&S program activities to the WE&T program (Energy Career Education and Training). NREN’s WE&T program will coordinate with IOU and statewide C&S programs to facilitate participation in those existing programs. While NREN does not have an active C&S program during this portfolio cycle, its programs continue to be consistent with C&S objectives by preparing rural communities, contractors, and local governments for successful implementation of current and emerging code requirements.

NREN’s entire portfolio contributes to C&S outcomes by increasing market readiness for energy efficiency and fuels-reducing technologies, such as heat pumps, HPWHs, envelope improvements, and load-flexibility technologies that are central to decarbonization. NREN’s residential and non-residential programs raise customer awareness of C&S aligned technologies, while the Energy Upgrade Financing program aims to reduce first-cost barriers that often prevent rural residents and small businesses from meeting code-related upgrades. Most importantly, NREN’s Energy Career Education and Training program expands the pool of local contractors trained in electrification, Title 24 requirements, and quality installation practices to ensure that qualified contractors are available to carry out the upgrades and installations.

NREN also directly strengthens local government capacity by offering technical assistance, benchmarking, education, and support for plan review and permitting, helping rural jurisdictions stay up to date with evolving building codes. This ensures that rural areas can meet C&S expectations while benefitting from the energy, affordability, and resilience improvements associated with electrification and efficiency efforts.

Sector specific coordination for C&S

As described above, NREN’s portfolio will not specifically serve the Codes and Standards segment, however, each of its sectors will support the Codes and Standards objectives. When NREN closed its C&S program at the end of 2025, the C&S activities were shifted to WE&T (Energy Career Education and Training). Consistent with the Commission’s Codes & Standards segment objectives, NREN’s Energy Careers and Training program will improve compliance with existing codes and standards by providing building officials, contractors, and workforce individuals with energy code trainings and resources to promote code compliance for energy efficiency projects, and by training and upskilling the workforce by implementing assessments, audits, benchmarking, installations, and other energy efficiency and electrification roles.

Chapter 7: Portfolio Coordination

Segment and Sector Specific Coordination

Coordination within the Same PA

1. Sector/segment specific coordination

NREN ensures strong coordination across all its programs, sectors, and segments through an integrated management approach designed to maintain shared equity goals, align market support functions, and deliver consistent customer experience across the entire portfolio. Equity objectives, such as prioritizing HTR rural customers, simplifying participation, and ensuring all communities’ access to trusted local support, are embedded in the residential, non-residential, public, workforce, and finance programs. Cross-segment coordination occurs continuously as NREN staff work to align customer pathways. NREN ensures all programs reinforce one another, reduce service

gaps, and collectively contribute to NREN’s long-term equity, decarbonization, and savings goals.

2. Program-specific coordination

To support coordination, NREN holds routine team meetings that include the portfolio lead, administrative team, and program leads for each program. These whole-team meetings ensure program updates, cross-sector issues, and customer trends are communicated consistently. Program-specific meetings occur more frequently and often include staff who support multiple programs. Outreach coordination is deliberately interconnected as NREN conducts joint marketing campaigns with other PAs and program partners to ensure residential, commercial, and public customers receive consistent messaging. Through this structured internal coordination, NREN ensures its programs function as a cohesive portfolio, maximizing participation and streamlining the customer experience across all sectors and segments.

Coordination with Other PAs

1. Coordination Participants

NREN coordinates with the following PAs, each of which intersects with NREN either geographically or through overlapping customer segments.

PG&E: NREN’s entire service area lies within PG&E territory, and PG&E is the sole IOU in NREN’s region. NREN and PG&E have active coordination occurring across all customer groups due to full geographic overlap. Equity and market support segment programs are included in both portfolios, but coordination is in place to minimize overlap, ensure customer needs are prioritized, and further ensure customers receive services from the program best suited to their needs without duplication. NREN intends to facilitate greater enrollment in PG&E programs where applicable.

PG&E (ESA statewide): NREN and the PG&E ESA programs overlap in the entire NREN territory within the equity segment. In accordance with Resolution E-5400, NREN developed an ESA Monitoring Plan (approved with NREN's MCAL submission), which is detailed in the section below. The monitoring plan ensures there is no duplication of services and that customers are referred to the program appropriate for their needs.

BayREN (Statewide): BayREN's statewide Home Energy Score (HES) offerings extend into NREN's territory. BayREN's statewide programs are in the market support segment. The HES program will be leveraged for consistency and to avoid duplicating efforts.

Pioneer Community Energy: Although Pioneer Community Energy does not currently administer EE programs, NREN maintains communication to ensure coordinated messaging to joint customers.

Sonoma Clean Power: Sonoma Clean Power overlaps with NREN's territory in Mendocino County. The residential equity segment overlaps between the two PAs. However, NREN and SCP maintain proactive coordination on energy efficiency kits, electrification readiness, and incentive stacking, ensuring prevention of duplication.

RCEA: RCEA is the Lead Portfolio Administrator of NREN. There is overlap in Humboldt County within the equity segment. NREN and RCEA coordinate program eligibility, messaging, and incentive stacking to ensure complementary support for customers, particularly where RCEA's local programs intersect with NREN's equity and public offerings.

Pacific Power: While there is no direct geographic program overlap between NREN and Pacific Power, NREN maintains coordination to ensure customers near service-boundary lines are routed to the correct PA and to avoid geographic confusion in outreach.

City of Ukiah: NREN collaborates with Ukiah’s municipal utility to ensure coordination of incentives and avoid duplicating services within the equity segment.

REN coordination through CivicWell: RENs sought to continue building knowledge and capacity among local governments, community-based organizations, and those who support them, developing a network that currently includes over 4,000 practitioners working to advance local energy efficiency and climate action in coordination with key state goals and agencies. RENs have become key players in delivering equitable energy efficiency benefits to ratepayers. Accordingly, the RENs committed to continue jointly funding CCEC^{51[1]} as a venue for local government engagement and received the support of Energy Division.

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

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

^{51[1]} BayREN’s Annual and Bi-Annual Budget Advice Letters, commencing in 2021, as well as the 2024–2031 Business Plan filing all discussed BayREN’s support of CCEC. See page 9 of BayREN’s 2021 ABAL and pages 31 and 44 of BayREN’s Portfolio Plan Testimony for examples.

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

2. Coordination Structure and Frequency

NREN maintains a mapping of customer segments, sector programs, and PA territories to identify potential overlap of programs. NREN regularly coordinates with PAs to ensure customer needs are being met without duplicating efforts. NREN also coordinates with other PAs via ad hoc meetings. NREN is committed to open and efficient communication in order to coordinate with other PAs.

D.18-05-041 requires PAs to submit a Joint Cooperation Memorandum (JCM) between EE PAs with overlapping service areas. Throughout 2025, NREN and PG&E collaborated to develop its first JCM to coordinate programs, and this JCM was filed on October 27, 2025. NREN's service territory overlaps with PG&E's territory, leading to the JCM between NREN and PG&E.

In developing the JCM, PG&E and NREN established a process for coordinating between their respective programs. Decision trees were developed for each program to describe the process to decide which program is appropriate per customer. NREN and PG&E continue to coordinate together to ensure there is no program duplication. The cooperative efforts ensure that NREN's customers are receiving complementary, but not duplicative, services, enabling NREN to fill gaps in coverage while PG&E continues to administer its statewide and core utility programs.

NREN coordinates with PG&E regularly to ensure efficient coordination is taking place. NREN coordinates with other PAs on an ad hoc basis before program launches to

ensure efficient coordination. NREN remains communicative and responsive to all PAs to ensure customer needs are being met without duplication.

Program leads and portfolio leads on NREN’s side are involved in all coordination processes. The counterpart roles at other PAs typically include program leads or program teams whose expertise support coordination.

3. Coordination Practices (Overlap Identification and Mitigation Workflow)

NREN upholds the intent of the advice letter SoCalREN 20-E (required by D.23-06-055, OP 32) to avoid substantially similar or duplicative programs. NREN avoids program overlap with other PAs by mapping customer segments, sector programs, and PA territories to identify potential overlap of programs. “Substantively similar” refers to programs serving the same customers with the same measures in a similar manner. For resource acquisition, substantively similar programs mean the end use and measures are the same. For market support, substantively similar programs have similar demand, supply, partnership, innovation, and accessibility characteristics. For equity programs, substantively similar programs have similar characteristics in addressing disparities in access, promoting resilience, health, safety, affordability and/or energy savings, reducing GHG and pollutant emission, and providing workforce opportunities. “Duplicative” programs are substantively similar programs that do not have meaningful differentiators. To comply with this requirement, NREN applies explicit criteria during program design and ongoing operations to ensure its offerings are gap-filling rather than duplicative.

NREN screens for potential overlap using the following criteria:

- Customer Segment Overlap: If a PA overlaps in the same sector or if the PA already effectively reaches NREN’s target audience

- Delivery Mechanism Overlap: If a PA is offering the same delivery mechanism to the same audience
- Measure and Technology Overlap: If measures offered by another PA within the same geography are identical to NREN's

To uphold the intent of OP 32, NREN maintains ongoing coordination with PAs to ensure customer needs are being met without duplicating efforts. Coordination is done through ad hoc meetings or more regular meetings depending on the level of coordination required. All decisions are documented through JCM updates, bilateral memos, or internal coordination logs.

If overlap is confirmed or likely, NREN can use eligibility adjustments to prevent duplication. This may include narrowing NREN eligibility to underserved groups (tribal, rural HTR, propane users, etc), to target customers outside the geographic or market scope of other programs.

4. Coordination with Market Transformation

NREN's approach to Market Transformation (MT) heavily aligns with the Disadvantaged Communities Advisory Group's (DACAG) guidance. DACAG emphasizes that clean energy program benefits must reach disadvantaged, tribal, and rural communities, and that agencies should prioritize equitable distribution of funding and resources. NREN applies these principles by acting as a local resource for rural customers to access MT initiatives. As highlighted in the DACAG framework, it is important for NREN to provide equitable regional access to its territory to ensure that MT initiatives do not inadvertently deepen inequities by being accessible to only urban markets.

Market transformation initiatives most relevant for NREN are heat pumps, heat pump water heaters, and weatherization. TECH Clean California had the goal to accelerate heat pump adoption statewide through incentives, training, market support, and pilots.

However, as of early 2026, TECH incentives have become fully reserved and TECH funding will not be replenished.⁵² Aligned with DACAG recommendations, NREN strives to increase access to clean energy technologies for underserved customers by providing access to direct install programs and resources for electrification.

5. *Coordination with Energy Savings Assistance (ESA) Programs*

Following D.24-09-031, Resolution E-5400 ordered NREN to develop an Energy Savings Assistance Program Overlap Monitoring Plan in its mid-cycle advice letter (filed November 04, 2025, and accepted December 31, 2025). The purpose of the monitoring plan is to ensure there is coordination between NREN’s programs and ESA, and limit any overlap that may exist. NREN’s ESA monitoring and coordination plan is detailed below:

NREN has established a coordination protocol between its Home Energy Advisors program and PG&E’s ESA program in the Joint Cooperation Memo between NREN and PG&E (submitted 10/27/25). This plan is listed below:

NREN program team will initiate regularly scheduled program coordination calls with PG&E programs teams and local ESA implementers. Ad-hoc meetings will also be scheduled to accommodate the need to resolve any urgent issues that might arise.

Standing agenda items may include program updates, uptake, challenges, contractor issues, data sharing, double dip prevention processes, and marketing campaign plans.

NREN and the ESA team at PG&E have also agreed on a referral and follow-up process for customers. Although residential resource and non-resource programs are listed in separate sections, in the regular coordination calls, the entire residential sector will be discussed holistically to ensure coordination across all customers.

⁵² <https://techcleanca.com/incentives/> Incentives – Fully Reserved

The key differences between the NREN Home Energy Advisors program and the ESA program include:

Geography: ESA and Energy Smart Homes serve all of PG&E territory while NREN programs only serve the 17 counties within NREN territory.

Customers: The NREN program will primarily target underserved, HTR, and tribal customers, which may include low-income customers. The ESA program serves only income qualified customers. Where a customer qualifies for both programs, the NREN program will only provide services that are not provided by the ESA program. These services will be established through coordination with the ESA program as described in the next section. The NREN Program will then make a referral to the ESA program on behalf of the customer and follow up on services. If the customer cannot be served by ESA, they may refer the customer back to NREN for additional services.

To monitor coordination, NREN will coordinate with PG&E to keep track of the number of customers, and which program each customer is referred to. NREN will request the results of the referrals from PG&E and follow up as needed. NREN will report on this data in its 2025 Annual Report.

6. Coordination with Other Demand Side Programs

NREN will integrate EE and broader IDSM objectives by educating customers and contractors on compatible load-flexible technologies and establishing referral pathways to DR programs where appropriate. Within NREN's programs, NREN will identify DR-ready homes and small businesses receiving EE upgrades and guide them to available DR enrollments to capture additive grid value without duplicating program administration.

Community Choice Aggregators (CCAs) serve a vital role in customer engagement and service. NREN is currently coordinating with the CCAs within NREN territory, including Pioneer Community Energy and Sonoma Clean Power. This coordination includes cross promotion and layering NREN measures with CCA-funded programs when available.

Redwood Coast Energy Authority is a Governing Partner and Lead Portfolio Administrator for NREN, so coordination is natural with RCEA's non-NREN programs such as clean transportation initiatives. With the addition of Yolo County, a fourth CCA, Valley Clean Energy will be added to NREN territory.

NREN is currently coordinating with the CEC Equitable Building Decarbonization (EBD) Direct Install program in the northern region of California. NREN staff have had preliminary meetings with the EBD program team to help facilitate CBO, customer, and contractor recruitment. NREN staff are also working to connect the EBD team with tribal communities. As of the development of this business plan, most of the EBD efforts have been in the southern and metropolitan areas of the state. NREN staff's ongoing communications with the EBD team are focused on ensuring that the program reaches the northern rural regions. Once the program begins implementation, NREN will align its participating contractor direct install channel with the CEC EBD program to cross-train and onboard NREN contractors into EBD and refer income-qualified households to eligible census tracts to EBD where EE upgrades are available. NREN will coordinate its outreach efforts and messaging, so customers are made aware of the integrated EE pathway rather than multiple competing offers. Because EBD is regionally administered and prioritizes low-income, disadvantaged, and tribal communities with no-cost electrification retrofits, alignment with NREN's rural programs will expand contractor capacity and accelerate equitable decarbonization without duplicating services.

NREN and EBD are planning on maximizing customer value through cooperation, cross-referrals to each other's programs, and layering of incentives. EBD currently plans on launching in Humboldt County in late 2026 or early 2027 and expanding throughout other NREN regions into the new business plan cycle. EBD preliminary estimates are for up to 300 single family homes and 170 apartment units within NREN territory.

Additionally, NREN is currently in communications with the CEC EBD Tribal (EBD Tribal) Direct Install program. The EBD Tribal program set aside funds for a tribal-focused subprogram of the EBD program and will serve buildings in California owned or managed by California Native American tribes or California tribal organizations, and buildings owned by members of California Native American tribes, with the goals of reducing GHG emissions and advancing energy equity. These goals align directly with NREN's portfolio goals, and NREN intends to connect its network of tribes to this program. This program has not yet launched, but when applications are released (expected Spring 2026), NREN will leverage its tribal network to share the benefits offered by this program.

NREN partners are committed to supporting the unique needs of their rural communities beyond CPUC-funded programs. The need for panel upgrades has been identified as a barrier toward electrification in rural communities, both because of the expense needed to conduct the upgrade and the limited capacity of the utility grid to accommodate service upgrades. Approvals [from whom?] for upgrades can be delayed by many months or not approved at all. RCEA participated with Build-It-Green in the CARB-funded development of a panel optimization and right-sizing tool designed to avoid the need for costly upgrades by more accurately calculating the actual predicted loads. RCEA participated in participant recruitment surveys, and reviews of the tool.

The needs of rural Californians that currently rely on unregulated fuel for heating and other uses have long been underserved in rural California. Because of the difficulties in tracking usage data, electrification programs have often been unable to account for real savings from fuel switching, and as such, these customers have been excluded from incentives available to other Californians seeking to reduce their dependence on fossil fuels. NREN partner agencies participated in a CEC-funded Propane Utilization Study to learn more about how NREN can work hoping to overcome these data gaps with the goal of better tracking propane use. NREN staff led participant recruitment in the Northern California region, helped develop survey tools and reviewed responses and final reports.

Chapter 8: Stakeholder Engagement

Stakeholder engagement is an important part of the BPA development process. As NREN was approved at a later date than the majority of PAs, the primary focus of recent engagement with stakeholders was focused on current program development which then informed the development of the application for the 2028-2031 portfolio cycle. As stated above in the Community Engagement sections, NREN did several needs assessments and as of the time of this filing completed a non-residential needs assessment that covered both the commercial and public sectors, as well as a gap analysis on financing with contractors. The non-residential recommendations included covering at least 50-100% of costs for HTR customers to increase uptake of measures, use delivery approaches that differ from IOUs, and simplify access via local resources. The study also found that public agencies are often reactive rather than proactive. The financing gap analysis found that there is low uptake of existing financing programs within rural, Northern California customers. Additionally, there were adverse impacts from the removal of federal grants, incentives and tax credits as contractors found

customers need incentives to be motivated to take on projects. The study also found that incurring debt for low-income customers is not a good solution for NREN communities.

As with the community engagement, NREN followed both informal and formal processes for gathering feedback. Many informal meetings where the current programs and application were discussed include community events where feedback was gathered on the Energy Career Education and Training program. There were approximately 10 events and the feedback included a desire for more HVAC, heat pump, building science, and energy management training as well as career pathways following training.

For the public programs, NREN was able to gain access to public agency feedback as two NREN partners manage Local Government Partnerships and three NREN Partners are joint powers agencies with boards made up of representatives from local government agencies and tribes. The responses received included favorable feedback and interest in participating in the programs. Lake County elected officials look forward to learning more about what future NREN specific tools and resources will be available for the County, the two incorporated cities and several school districts. The RCEA Community Advisory Committee (CAC) supported the application and encouraged engagement with local agencies, particularly when it came to workforce development.

NREN also engaged with BayREN on its statewide Home Energy Score California program and found that RENs could benefit from working together. NREN could provide marketing and outreach for the program and enroll local contractors, CBOs, and staff into assessment training. BayREN could offer in-person training sessions within NREN territory. NREN could then leverage the trained home assessors to provide Home Energy Score assessments and reports for their customers and utilize the report recommendations as a pipeline into the Home Energy Upgrades program.

NREN also participated in formal stakeholder engagement, including presenting portions of its BPA strategy to CAEECC at the BPA “formal consult” meeting in December 2025 and attending the Energy Advisory Committee in February.

At the CAEECC Formal Consult meeting, NREN presented strategies for this BPA, including its priority for community-based design, as evidenced by its plans for a market characterization study and a non-residential needs assessment. These studies allow NREN to learn directly from its communities about how to improve or expand its programs and services. Additionally, NREN discussed its plans to re-segment its two resource acquisition programs to be equity programs instead, a decision that allows NREN to focus on equity customers and provide equitable access to energy efficiency. While NREN did not receive any questions or comments on its strategies at the CAEECC Formal Consult, NREN remains collaborative and aligned with the efforts of CAEECC.

These efforts also include aligning with the CAEECC Equity Advisory Committee’s (EAC) recommendations. NREN remains present and active in EAC’s meetings in an effort to promote equity throughout its portfolio. NREN’s portfolio strategies, detailed in Chapter 3 of this BPA, are centered around equity and considers the EAC’s recommendations from its initial memo (dated 12/19/2025). For example, NREN integrates the recommendation to “streamline eligibility to reduce participant burdens and advance equitable outcomes” throughout its programs by offering program support and referrals. NREN’s policy recommendation to include propane customers in fuel switching also advances this recommendation from EAC and would be integral to reaching more equity customers. Since the first memo, NREN has actively participated in following EAC meetings and will continue participation. NREN considers the EAC’s recommendations and remains engaged with the committee to more equitably serve its customers.

NREN staff gave a presentation to the City of Blue Lake on February 10, 2026 at an open City Council meeting. The City of Blue Lake is a small, rural community of under 1200 residents. Previously a thriving logging town, the City's population has aged and there are few, if any, economic activities available. The City was also the site of a long-running wood biomass power plant, which contributed to poor air quality and was the subject of significant controversy when the owners attempted to restart it. The City has been exploring avenues to repurpose the facility for positive community impact. Positive feedback was received at the City Council meeting on both NREN's current activities and planned 2028-31 business plan, for which the council provided a letter of support. The City Council asked questions about how NREN would be able to assist with the City's GHG reduction goals and general operating expenses. The public also expressed concerns about rising energy costs and asked how NREN could help. HVAC upgrades and weatherization were prime needs expressed. The public also commented on how difficult it could be to access any programs to assist with energy efficiency and that there were long waits for service, if it ever arrived. This led to a general lack of trust with agencies or contractors from outside the community making promises. These concerns were already at the forefront of NREN's goals, and the fact the NREN staff member presenting to the Council was a known and trusted member of the community helped bridge those gaps. Finally, one community member expressed the need for ease of access to programs. Community members had experienced lengthy and complicated application processes with little support. NREN is incorporating this feedback by streamlining its application process and allowing multiple avenues for rural citizens to benefit from its programs.

On February 23, 2026, NREN staff met with staff from the Blue Lake Rancheria (BLR), a federally recognized Native American tribe that has been a leader in clean energy and resilience efforts. NREN provided a summary of proposed programs and activities and

received feedback. Discussion focused on partnerships to better serve tribal members and communities throughout NREN territory. BLR staff described a need for more contractor training specific to working within tribal communities. Development projects within and around tribal communities have often been associated with negative outcomes, ranging from lack of economic opportunities and growth for tribal governments and members, to a tragic rise in incidences of Missing and Murdered Indigenous Persons (MMIP). As a result of this meeting, NREN has committed to co-sponsoring a *Pathways to Trust* workshop for developers put on by the Alliance for Tribal Clean Energy.⁵³ Furthermore, NREN’s Energy Career Education and Training program will partner with BLR’s Tribal Electrician’s Pre-Apprenticeship Training Program to provide more pathways for tribal members to participate in clean energy careers. BLR has provided a letter of support for NREN’s BPA.

On February 9, 2026, NREN met with Senator Mike McGuire’s staff to receive feedback on the business plan. The Senator’s staff emphasized the current energy affordability crisis and how difficult it is for community members to focus on energy upgrades when they are struggling to pay their bills. NREN is responding by including higher equity incentive tiers in all its eligible programs. Senator McGuire has provided a letter of support for the NREN BPA.

On January 10, 2026, NREN staff participated in meetings and a volunteer clean up in the community of King Salmon, a small, lower income town on the coast of Humboldt Bay that was heavily impacted by coastal flooding during this year’s king tides. In addition to meeting with community members, NREN staff also had the opportunity to meet directly with Assemblymembers Chris Rogers and Damon Connolly. Residents of the community incurred significant damage to their homes and many appliances were

⁵³ <https://tribalcleanenergy.org/preferred-provider-program>

lost. NREN staff shared resources for rebates, but many residents replied that the incentives were not high enough and they did not have time to shop for qualifying Energy Star appliances when they had no way to heat water, cook, or store their food. While RENs are not set up as emergency response providers, meeting with community members at such a challenging time and assisting however able is a means to increase trust and build lines of communication. The idea of an appliance lending program was discussed, and NREN will explore if there are possibilities of incorporating it into its existing offerings. This also emphasized the need for higher equity incentives, broadening the definition of equity customers to include those impacted by natural disasters, and streamlining the application and processing of incentives so customers who may be experiencing multiple challenges do not need to wait as long for incentive payment. It also underscored the importance of access to eligible, affordable appliances in the region. Both Assemblymembers Rogers and Connolly are providing letters of support for NREN's BPA.

Addressing stakeholder feedback

NREN values the feedback received from stakeholder engagement. Much of the engagement was done prior to drafting the application, but strategies proposed for the application were adjusted based on insights from stakeholders. Some highlights of the input integrated into the application include:

- The Energy Career and Education Training program will partner with CBO providers such as educational institutions, tribes, and industry associations to deliver skill building curriculum and provide pathways into the workforce.
- The Public Energy Services program will provide technical assistance for climate and electrification planning to help agencies become more proactive and then support accessing funding opportunities to make those plans into reality.

- The Energy Upgrade Financing program will provide technical assistance to support existing financing programs such as OBF and Go Green Financing, enrolling local contractors and credit unions into the programs.
- Across all programs, local trusted resources will be utilized, program enrollment simplified, and costs of entry reduced for participants.

Chapter 9: Evaluation, Measurement & Verification

NREN currently serves 17 rural counties in Northern California, which are divided into two non-contiguous sections, Humboldt, Mendocino, and Lake Counties to the west and 14 Sierra Nevada counties reaching to the eastern border of the state. One of NREN's founding principles was to deliver service to eligible customers in these remote Northern California regions that have been isolated from and underserved by existing statewide and IOU energy efficiency programs. NREN's current service territory does not include all rural Northern California customers, and since its inception, NREN has received interest from some of these still unserved areas to bring NREN programs there, including from areas outside of PG&E service territory such as the northern- and eastern-most portions of the state. NREN believes that bringing services to the most rural HTR areas of the state is an important equity issue, while also being realistic about its own capacity for rapid expansion.

In furtherance of reaching these goals, NREN has decided to include Yolo County in its service territory beginning in the 2028 business plan cycle, to be served by existing staff at the County of Yolo, as well as portions of Trinity County that have been served by RCEA through other programs in the past. NREN plans to conduct a *Market Characterization and Needs Assessment* in the remaining areas of Northern California eligible to receive services under CPUC administered energy efficiency funds. Figure 6 shows the planned *Market Characterization and Needs Assessment* area. This assessment

will analyze access to existing services, identify and coordinate with community-based organizations, local governments, and tribes; determine the sectors with the greatest needs and how they might be best served; and develop a road map to either serving them through NREN-delivered programs or facilitate other service providers that might be able to more effectively offer programs. If there is sufficient interest from customers and local representatives, NREN may begin to offer some of its remote services such as downstream rebates and phone-based assessments to these customers if the results of the *Market Characterization and Needs Assessment* determine that to be a viable option. *The Market Characterization and Needs Assessment* will be funded through NREN's EM&V budget.

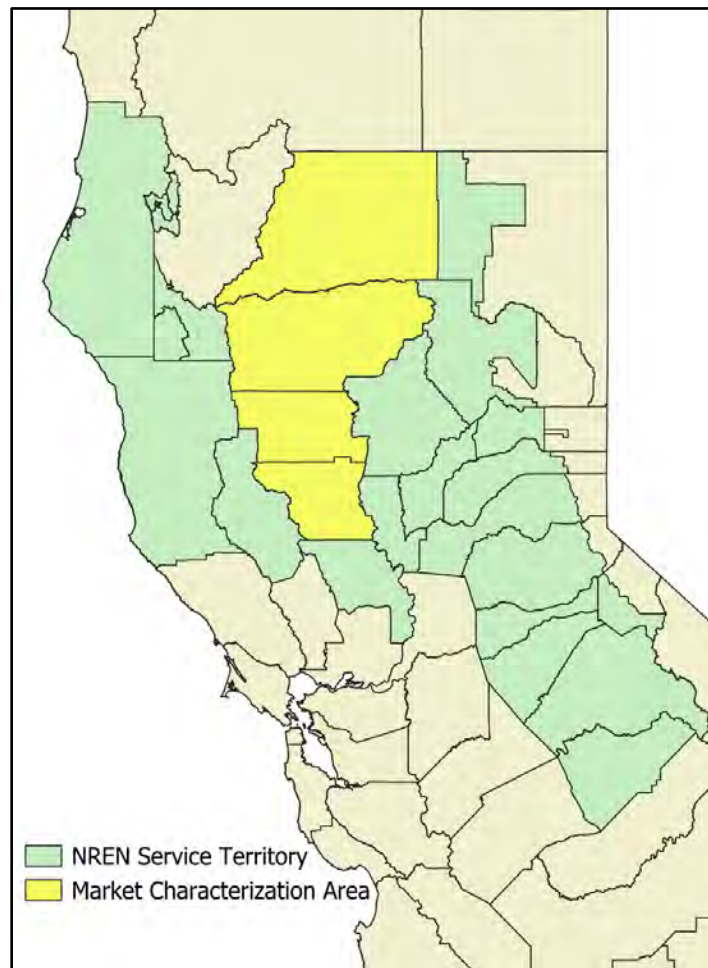


Figure 0-6: NREN Service Territory and Market Characterization Area

Furthermore, NREN has had preliminary conversations with Pacific Power and Liberty Utilities on strategies to best align services to ensure all rural Northern California communities are equitably served. Customers in Pacific Power and Liberty Utilities territory are served by ratepayer funds administered by the CPUC, but in a different proceeding than those in PG&E territory. While *The Market Characterization and Needs Assessment* will focus on customers in PG&E territory that could be eligible for NREN services, NREN will continue exploring options with the CPUC and other IOUs to determine how best to use ratepayer funds across all of Northern California.

Because of the recent formation of NREN, many EM&V studies are forward-looking to inform how to shape programs to best fit the region. In the 2028-2031 program cycle, NREN will also evaluate its programs by sector. PA EM&V funds will be used for a follow up residential, commercial and public sector study to complement the studies at the beginning of the program launches. NREN is developing a robust database in the existing program cycle to assist with data collection and analytics for these studies. This also allows NREN internal staff to evaluate programs on a rolling basis. NREN is requesting \$985,994.60 over the four-year cycle for PA EM&V and the remaining EM&V allocation of \$2,599,440.31 will be held by NREN's fiscal agent to fund CPUC evaluation.

Chapter 10: Cost & Cost Recovery (IOUs only)

Not Applicable.

Chapter 11: Recommendations for New or Modified EE Policy

Allow Fuel Switching in Energy Efficiency Programs

Policy Recommendation

NREN respectfully recommends that the Commission modify existing Energy Efficiency (EE) policy to expressly permit fuel switching from unregulated fuels (including propane, butane, and fuel oil) to regulated electric service where such switching is cost-effective, reduces greenhouse gas (GHG) emissions, and advances equity and affordability objectives.

Background and Need

NREN’s service territory includes a disproportionately high percentage of customers who rely on unregulated fuels—primarily propane—for space heating, water heating, and cooking. As a result, a significant segment of NREN’s eligible customer base is effectively precluded from participating in electrification-focused energy efficiency programs under current policy constraints. As demonstrated in Figure 0-1: Prevalence of Bottled and Tank Gas Fuel Usage in NREN Counties, NREN counties show materially higher concentrations of bottled and tank gas usage compared to statewide averages, underscoring the structural inequity created by current fuel-switching limitations.

Under current program rules and measure package guidance, customers using propane or other unregulated fuels are generally ineligible for incentives when replacing those systems with electric alternatives, whereas customers switching from regulated natural gas to electricity may qualify. This distinction creates an unintended and inequitable barrier for rural households. This limitation is particularly consequential for NREN’s HTR

customers, many of whom rely exclusively on propane for heating and cooking. In practice, these households face higher fuel price volatility, limited supplier competition, and higher per-unit energy costs than customers served by regulated utilities. Allowing fuel switching from propane to high-efficiency electric technologies can provide measurable GHG reductions, improve indoor air quality, and reduce long-term household energy burden when paired with appropriate rate design and incentives.

Accordingly, NREN recommends that the Commission authorize fuel switching for customers using unregulated fuels, subject to existing cost-effectiveness screening and emissions accounting requirements. Doing so would expand equitable access to EE funding, better align programs with state decarbonization goals, and eliminate a structural disparity affecting rural Californians.

Procedural History and Commission Record

In R.25-04-010 NREN, BayREN, 3C-REN, CCR REN, SDREN, and I-REN (collectively, the Joint RENs) filed joint comments affirmatively requesting that the Commission consider fuel switching from unregulated fuels within the scope of the proceeding. In the July 23, 2025 Scoping Ruling, the Commission expressly stated that it expects to evaluate whether EE funding should be available to encourage fuel switching from unregulated fuels to regulated fuels as part of the Natural Gas Measure Policy and Definition of Viable Electric Alternatives policy issue. This acknowledgment establishes clear procedural footing for resolving this issue in the current rulemaking.

In R.13-11-005, parties previously requested that non-utility fuels such as propane and fuel oil be incorporated into the Commission’s fuel-switching framework and evaluated under the three-prong test, noting the potential for GHG reductions and alignment with

California’s climate objectives.⁵⁴ In D.19-08-009, the Commission recognized the importance of fuel switching policy but deferred comprehensive resolution to subsequent proceedings, including the Building Decarbonization rulemaking (R.19-01-011).⁵⁵ The present rulemaking provides the appropriate venue to resolve this longstanding policy gap.

Implementation Barriers Under Current Measure Guidance

NREN’s portfolio relies in part on deemed measure packages to deliver cost-effective and administratively streamlined programs. Under prior guidance, NREN could apply a “normal replacement” measure application type in cases where existing equipment did not match the electric base case or where no comparable equipment existed. In such cases, programs conservatively claimed only the incremental electric savings relative to a standard practice electric baseline, without claiming avoided propane consumption. Recent updates to measure package rules have eliminated this pathway by requiring “like-for-like” replacements or by disallowing electric-only savings claims when replacing gas-fueled equipment. As applied, these restrictions also preclude replacements of propane systems, even when only electric savings are claimed. Additionally, several exempt measures, including building envelope improvements, exclude properties with propane HVAC systems, notwithstanding the fact that such projects generate verifiable electric savings independent of the displaced propane load. NREN has evaluated the use of Normalized Metered Energy Consumption (NMEC) methodologies; however, existing NMEC rules do not provide a framework for quantifying avoided propane consumption, and no Technical Support Document (TSB) currently exists to support such savings

⁵⁴ D.19-08-009 at 11.

⁵⁵ *Ibid.*, at 12.

claims. The absence of a methodology effectively renders these customers ineligible, irrespective of actual electric savings.

Equity, Affordability, and Policy Alignment

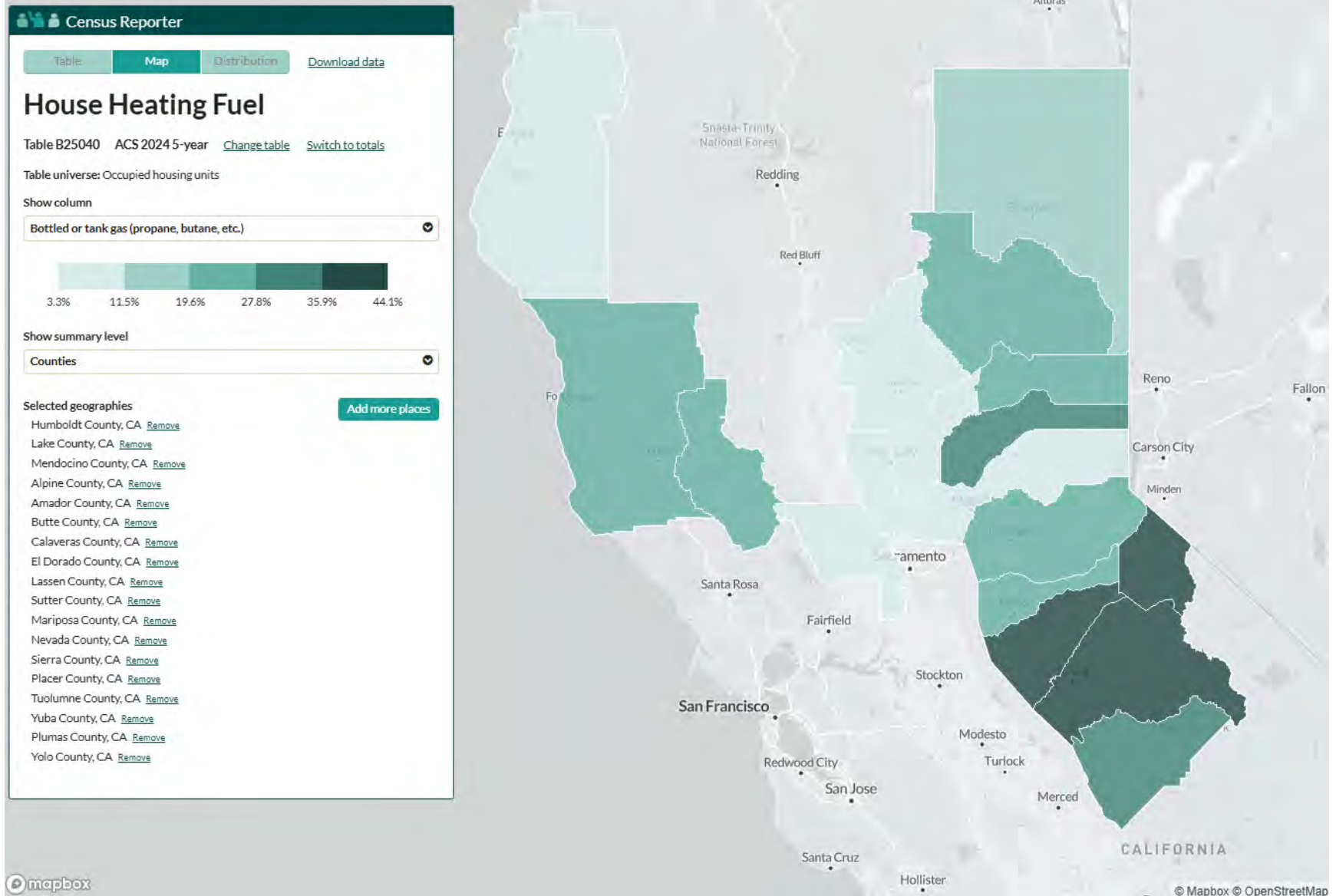
In comments on R.25-04-010, the Joint RENs urged “the Commission to address the issue of unregulated fuel switching in this proceeding and specifically address how utility ratepayer funded EE programs can offer services to customers with a mix of regulated and unregulated fuels.”⁵⁶ Failing to permit unregulated fuel switching creates a disparate outcome: rural propane customers, who often face higher energy burdens, are excluded from the very electrification incentives designed to reduce emissions and long-term energy costs. This outcome is inconsistent with the Commission’s equity directives, the State’s climate mandates, and the objective of advancing affordability.

Given the Commission’s prior acknowledgment of the importance of fuel switching policy, and the clear record demonstrating need, NREN respectfully recommends that the Commission adopt explicit guidance allowing EE incentives for cost-effective fuel switching from unregulated fuels to regulated electric service. Such action would:

- Eliminate inequitable treatment of rural and propane-dependent households;
- Advance GHG reduction and building decarbonization objectives;
- Support long-term energy affordability by enabling high-efficiency electric technologies; and
- Provide clear implementation guidance to Program Administrators and RENs.

⁵⁶ Joint REN Comments on R.25-04-010 Energy Efficiency Order Instituting Rulemaking at 8.

Figure 0-7: Prevalence of Bottled and Tank Gas Fuel Usage in NREN Counties



Address Equity Gaps in Deemed Measures

Policy Recommendation

NREN respectfully recommends that the Commission modify the deemed measure framework to:

- Permit RENs to use expired or prior versions of deemed measure packages for equity-focused programs where appropriate;
- Direct prioritization of measure development that incorporates equity, fuel substitution, and non-energy benefits (“NEBs”) alongside cost-effectiveness; and
- Ensure that the DEER update process evaluates equity and decarbonization impacts before measures are expired or discontinued.

Background on the Deemed Measure Framework

The California Electronic Technical Reference Manual (eTRM) contains approximately 180 deemed measures, developed and updated by Lead Program Administrators (Lead PAs) and approved by the Commission. Approved measure packages form the basis for reporting installations through the California Energy Data and Reporting System (CEDARS) and are used to substantiate monthly, quarterly, and annual portfolio performance reports to the Commission. Measures periodically expire or are not renewed when they no longer meet IOUs cost-effectiveness thresholds or portfolio optimization criteria. As IOU portfolios are subject to strict cost-effectiveness requirements, measure development and renewal decisions are primarily driven by total resource cost performance and portfolio savings maximization.

Structural Equity Gap for RENs

RENs by contrast, are not subject to the same portfolio-level cost-effectiveness requirements and are instead evaluated on broader statutory and Commission-directed

objectives, including equity advancement, non-energy benefits, market transformation, and fuel substitution. Because RENs pursue objectives beyond first-order cost-effectiveness, equity-focused programs would materially benefit from the ability to use expired or prior versions of measure packages where such measures remain technically valid and aligned with community needs. In addition, the Commission should prioritize development of new or revised measure packages that optimize not only energy savings and cost-effectiveness, but also fuel substitution impacts, health and safety improvements, and other equity indicators. Currently, CEDARS reporting captures only deemed savings metrics tied to active measure packages. As a result, important equity achievements, particularly in DACs, HTR, underserved, low-income households, and rural territories, are not fully reflected in claims reporting, and some participant groups remain unserved when their needed measures are no longer available within the deemed framework.

Addressing these equity gaps is increasingly urgent as the Commission advances efforts to track and potentially incorporate NEBs and other equity indicators into portfolio performance metrics and goal-setting. Without structural adjustments, the deemed framework may unintentionally undermine the Commission’s evolving equity objectives.⁵⁷

Illustrative Example: Clothes Dryer Measure Packages (SWAP014-04)

A concrete example is the clothes dryer measure package (SWAP014-04). At present, there is no approved deemed pathway for replacing a gas clothes dryer with a standard electric resistance dryer (i.e., non-heat pump). In NREN’s rural territory, where panel capacity, housing stock, and cost constraints may limit immediate adoption of heat pump dryers, the absence of a gas-to-electric resistance pathway prevents incremental

⁵⁷ D.23-06-055 Ordering Paragraph 19.

electrification progress. Allowing this substitution would demonstrate measurable movement away from direct combustion appliances and toward electrified end uses. Such substitutions would also generate non-energy benefits, including improved indoor air quality, reduced combustion-related safety risks, and increased alignment with California’s long-term building decarbonization goals. The Commission’s EM&V Group A Regional Energy Networks, Program Year 2022 Evaluation Study recognizes the unique role RENs play in advancing equitable decarbonization outcomes:

RENs are in the unique position of being able to support more effective CPUC policies and California’s larger decarbonization goals through innovative solutions and scalable activities. For this reason, RENs should consider increasing efforts to create a pathway to electrification such as higher incentives and rebates, varying levels of incentives, and equity-focused multipliers that target low-income participants, DACs, and environmental justice areas.⁵⁸

The current deemed structure, however, does not consistently provide the necessary measure pathways to operationalize these findings.

Policy Alignment and DEER Process Recommendation

While certain equity-oriented measures may not yield the highest deemed savings values or meet strict cost-effectiveness prioritization criteria, they remain aligned with Commission directives related to equity, decarbonization, and market support in underserved communities. Before measures are expired, deprioritized, or materially modified, their value should be evaluated not only on energy savings metrics, but also

⁵⁸ EM&V GROUP A Regional Energy Networks, Program Year 2022 California Public Utilities Commission CALMAC ID: CPU0372.01 at page 106.

on their contribution to fuel substitution, electrification pathways, NEBs, and service to DACs, rural, and environmental justice communities. NREN recommends that the Commission direct staff and Lead PAs to incorporate this equity-focused review into the next Database for Energy Efficiency Resources (DEER) update cycle (DEER2028, E-5152), including explicit consideration of equity and fuel substitution impacts when measures are updated or proposed for expiration.

Absent targeted reforms, the deemed measure framework, while administratively efficient for IOUs, risks reinforcing inequities by limiting REN access to measures necessary to serve rural, low-income, and propane-dependent households. Modifying the framework to account for equity, NEBs, and fuel substitution impacts will better align reporting structures with the Commission’s stated policy objectives and ensure that all Californians can equitably participate in the clean energy transition.

Allow Rebates Higher Than Incremental Costs Gaps

NREN is finding programs designed for HTR participation require higher incentives to overcome market barriers across many implemented energy efficiency measures. Rebating only the cost to get higher efficiency equipment above code is not the reality of many HTR participants. They typically have equipment below current code and the full cost to complete the work is higher than only incremental costs. Previous guidance in Decision D.06-06-0632 Energy Division (ED) recognized only “limited instances for program design purposes where the cash rebate to the customer exceeds the measure installation cost”. However, exceptions have only been allowed on a per measure basis to-date for fuel substitution programs per the May 16, 2024 memorandum with the subject “Revised CPUC Guidance Requiring Addendum to Measure Package Documenting Rebate Greater than Incremental Measure Costs”. NREN proposes approval of a more overarching exception for programs that target HTR participants as

this would reduce administrative burden and allow for increased program participation and increased program results.

Equity Definition

The Commission has long acknowledged both the need and the priority of serving ratepayers that are HTR and are underserved by programs. The current HTR definition, however, excludes large swaths of populations that face significant barriers to program participation, including but not limited to individuals with Access and Functional Needs (AFN), communities impacted by climate-related natural disasters, and counties included in metropolitan statistical areas that meet the underserved definition.

In D.23-06-055, the Commission explained that the purpose of the equity segment within the Energy Efficiency portfolio segmentation framework is to provide programs to hard-to-reach or underserved customers and disadvantaged communities in advancement of the ESJ Action Plan. The objectives of the equity segment rely on three distinct, but related, customer criteria:

- Hard-to-Reach (HTR) – a barrier-based test incorporating a geographic criterion and additional criteria such as income qualification (CARE, ESA, or FERA), housing type (multi-family and mobile home tenants), language, and split incentive conditions.⁵⁹
- Disadvantaged communities (DACs) – a subset criteria of HTR geographically identified pursuant to Health and Safety Code Section 39711. (D.23-06-055 at 50.)
- Underserved customers – defined by statute as members of an underserved community pursuant to Public Utilities Code Section 1601(e).⁶⁰

⁵⁹ D.23-06-055 Conclusions of Law 33

⁶⁰ D.23-06-055 at pp 45–48

While the current geographic HTR criteria also overlaps with DACs, it does not include underserved customers as defined above.

As described in the equity segment strategies in Chapter 6, the geographic restrictions of HTR can disqualify communities around the Sacramento area even though they are still very isolated and rural, due to the fact that their entire counties are included in the metropolitan statistical area. For these reasons, NREN recommends using the underserved geography in addition to the HTR geographic definition.

Also excluded are AFN individuals. The Commission identified collaboration with and understanding the needs of this group to be a critical topic for consideration in Version 2.0 of the CPUC Environmental & Social Justice Action Plan (ESJ Action Plan).⁶¹ The addition of this group into the HTR definition would be a natural expansion of the definition as there is significant overlap between the two definitions. Adding AFN to the HTR definition would break down an existing regulatory silo and would likely result in more targeted programming to this population who fall within the primary purpose of equity segment programs.

NREN additionally requests that the commission consider adding communities that are impacted by natural disasters be included in the geographic definition for HTR.

Increased natural disasters, such as wildfires, severe storms, and coastal flooding, are some of the most visible catastrophic results of the climate crisis caused by our reliance on fossil fuels. Entire communities can be devastated for years or generations. Just as negative impacts to communities experiencing poor air quality from local emissions need to be addressed through ESJ and equity considerations, so do communities experiencing negative impacts from global GHG emissions.

⁶¹ CPUC Environmental & Social Justice Action Plan, Version 2.0, p.4.

REN Total Benefit Metric

NREN supports SoCalREN’s development of an accountability framework that utilizes a non-energy benefits calculator to establish a standardized metric for setting annual portfolio goals and tracking REN performance.

While the current TSB metric captures essential grid impacts, it does not account for the extensive participant, partner, and community benefits that are central to the mission of the RENs as well as alignment with CPUC Equity mandates. To ensure a comprehensive evaluation of portfolio performance, SoCalREN has developed a *proposed* specialized benefits calculator (REN Benefits Calculator Tool) to output a REN Total Benefit (RTB) metric providing a more comprehensive picture of ratepayer value.

NREN recommends the Commission direct SoCalREN to initiate a stakeholder working group for feedback. NREN requests the Commission include other RENs in the testing and development process for this calculator.

Funding Cliff

NREN would like to bring up the concern about funding cliffs if this becomes necessary. Extending the timing of the BPA approval further into 2027 than previously anticipated would result in a funding decrease for NREN if the current guidance from D.21-05-031 is applied. The Commission has clearly recognized that “[f]unding cliffs created by regulatory delays are detrimental to the energy efficiency market and can potentially thwart long-term gains in energy efficiency.”⁶² For that reason, the Commission adopted an approach to avoid those cliffs in D.21-05-031, in which PAs may “continue budgets at the four-year average from the previous approved four-year energy efficiency portfolio,

⁶² D.21-05-031 Finding of Fact 13.

until such time as the Commission approves a new portfolio and budgets.”⁶³ The Commission’s recognition of the detrimental effects of funding cliffs and the idea of providing guidance to avoid funding cliffs is very important and appreciated. However, NREN has a unique situation with regard to its current four-year portfolio funding.

In September 2024, the Commission modified the existing structure for the Rural Regional Energy Network (Rural REN) approved in D.23-06-055 into two separate rural RENs. D.24-09-031 approved the program budget for NREN and the Central California Rural Regional Energy Network, which modified the overall program budget approved for Rural REN in D.23-06-055. As a result, NREN’s approved funding did not cover four full years, and therefore, NREN respectfully requests that the CPUC provide updated guidance for recently approved RENs in order to prevent funding drop offs.

NREN suggests using the Year 4 funding level at the conclusion of the program cycle and beginning of the new program cycle to allow for adequate funding in the event of a delay in approvals for 2028-2035 applications. An average of the 2024-2027 four-year funding cycle would not be adequate as ramp up was included in NREN’s funding to account for the timing of NREN program launches. The beginning years of NREN’s program cycle, when averaged across the four-year period, do not reflect a feasible amount to be used for continued funding in 2028 and beyond, and instead, NREN’s Year 4 budget should be used.

⁶³ Ibid., Conclusion of Law 23.

Proceeding: A.26-03-XXX

Exhibit No.: NREN-02

Date: March 16, 2026

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

NREN
PROGRAM CARDS

Program Name: Home Energy Advisors

Program ID: RRN001

New / Existing: Existing

Expected Program Duration: 2028 - 2035

Portfolio Segment: Equity

Program Implementer Type: PA

Applicable Sector: Residential

Customer Group(s): Residential

Sector Challenges:

Inefficient rural housing stock creates high energy costs and comfort and safety challenges in underserved communities.

Sector Opportunities (Expected Outcome(s)):

Targeted energy education and efficiency tools help underserved rural households understand and reduce energy waste.

Brief Program Description (including customer target, program strategies deployed, expected):

The Residential Equity Program serves rural and underserved households by increasing energy awareness and supporting energy-saving behaviors through energy efficiency kits, educational opportunities, and energy advisor-led technical assistance, including bill and energy usage analysis, tool lending, project support, and connections to IDSM resources such as EV charging, solar, battery storage, and demand response.

Known Equity Concerns in the Selected Markets (if applicable):

Rural and underserved communities face disproportionate energy burden, barriers to participation, and historic underinvestment in energy efficiency and clean energy resources.

Proposed Solutions to Equity Concerns (if applicable):

The program offers flexible, community based outreach, multilingual engagement, and trusted local partners to reduce participation barriers. Energy Advisors provide one-on-one support to help customers understand opportunities, access tools, and take action.

Intervention Strategy: Behavioral Education; Technical Assistance; Training; Marketing and

Delivery Type: Downstream

<p>Outreach/Information; IDSM Coordination</p>	
<p>Measurement and Verification Methods: Other</p>	<p>Program Total System Benefit (TSB) for 2028-2031: N/A</p>
<p>Annual Budgets for 2028-2031: 2028: \$3,421,141.10 2029: \$3,721,713.40 2030: \$4,092,618.11 2031: \$4,512,285.72</p>	<p>Cost Effectiveness (TRC and PAC Test Ratios) for 2028-2031: TRC: N/A PAC: N/A</p>
<p>Anticipated directional and scale changes in budget for years 2032-2035: Anticipate an increase in budget for this program for years 2032-2035, based on program performance during the 2028-2031 cycle.</p>	<p>Market Actors necessary for success: Community-based organizations; trusted local partners</p>
<p>High-level description of delivery workforce including necessary scale and its risks: Existing NREN staff deliver energy efficiency kits, conduct home energy assessments and provide education in rural, hard to reach communities. Limited staffing can be scaled through partnerships with community-based organizations. Risks include limited staff capacity across a large geographic region, challenges reaching dispersed rural households, and maintaining consistent training for partners and CBOs.</p>	
<p>Near-term Program Output(s) (1-4 years): Distribution of energy efficiency kits, completion of basic home energy assessments, and delivery of energy education to rural and hard-to-reach households. Increased awareness of energy efficiency opportunities and immediate, low-cost energy savings options.</p>	
<p>Long Term Outcome (5-10 years):</p>	

Improved household energy efficiency and reduced energy burden for rural and underserved and electrification programs leading to greater participation in future clean energy offerings and long-term climate and health benefits.

Does this program interact with other programs in this PA portfolio? If so, describe:

Home Energy Upgrades

Program Metrics and Indicators (KPIs):

- Equity-targeted customer participation, percentage of total
- HTR customer participation (EQ01a/b/c/f, EQ13a/b/c/f)
- Outreach events held (#)
- Educational Activities offered (#)
- Digital media offerings (#)
- EE kits distributed (#)
- Audits conducted, in person (#), phone (#)Energy Assessment Reports delivered (#)
- Number of jurisdictions reached
- Number of census tracts served

Does this program utilize Integrated Demand Side Management (IDSM)?

Yes

Link to Existing Implementation Plan, if existing:

<https://cedars.cpuc.ca.gov/programs/RRN001/details/>

Program Name: Home Energy Upgrades

Program ID: RRN014

New / Existing: Existing

Expected Program Duration: 2028 - 2035

Portfolio Segment: Equity

Program Implementer Type: PA

Applicable Sector: Residential

Customer Group(s): Residential

Sector Challenges:

Older housing stock requires building upgrades. There are a limited number of qualified contractors in the region. There are resiliency concerns for electrification as this region frequently faces grid outages.

Sector Opportunities (Expected Outcome(s)):

Low market penetration and lack of available programs provide a large customer base and opportunities for energy efficiency measures.

Brief Program Description (including customer target, program strategies deployed, expected):

The Home Energy Upgrades program meets customers where they are at with multiple delivery channels, including downstream rebates for energy efficient electric appliances, a participating contractor direct install program for heat pumps, HPHW, and building envelope, and an NMEC program for a comprehensive multiple measure approach. Program outreach will be focused on rural hard-to-reach customers who have not been able to participate in traditional EE programs.

Known Equity Concerns in the Selected Markets (if applicable):

This region has lower than average income, higher than average energy burdens, older housing stock in need of upgrades, unreliable transmission infrastructure, further distances to participating vendors in

Proposed Solutions to Equity Concerns (if applicable):

Higher incentives, support navigating upgrades or minimizing need for panel upgrades, offering remote downstream service, and participating contractor model

<p>midstream programs, and fewer qualified contractors which results in higher installation costs.</p>	
<p>Intervention Strategy: Remote and in-home assessments; downstream rebate catalog; participating contractor direct install; population NMEC</p>	<p>Delivery Type: Downstream for simple appliance measures to serve the most customers. Direct install for more complex measures for greater savings and incentives</p>
<p>Measurement and Verification Methods: Deemed, Custom, NMEC - Population</p>	<p>Program Total System Benefit (TSB) for 2028-2031: \$8,691,360.43</p>
<p>Annual Budgets for 2028-2031: 2028: \$3,365,956.50 2029: \$3,845,761.60 2030: \$5,623,786.31 2031: \$6,678,783.88</p>	<p>Cost Effectiveness (TRC and PAC Test Ratios) for 2028-2031: 2028: TRC: 0.23 PAC: 0.24 2029: TRC: 0.34 PAC: 0.35 2030: TRC: 0.56 PAC: 0.59 2031: TRC: 0.63 PAC: 0.67</p>
<p>Anticipated directional and scale changes in budget for years 2032-2035: Anticipate an increase in budget for this program for years 2032-2035, based on program performance during the 2028-2031 cycle.</p>	<p>Market Actors necessary for success: CBOs, local contractors, local vendors</p>
<p>High-level description of delivery workforce including necessary scale and its risks: Existing NREN staff centralization of downstream activities will minimize staff needed across a broad region. Risks are maintaining training and compliance with CPUC regulations and minimizing staff turnover. Local participating contractors for direct install. Risks are availability</p>	

of skilled local workforce, ability to follow program guidelines, and making the program appealing enough to attract participation.

Near-term Program Output(s) (1-4 years):

Greater adoption of energy efficient electrification technologies by rural households. Bill savings. greater reach into underserved areas.

Long Term Outcome (5-10 years):

Less reliance on fossil fuel technologies in homes resulting in climate and health benefits. Greater familiarity with EE and Electrification equipment and appliances among rural populations and acceptance and socialization in communities.

Does this program interact with other programs in this PA portfolio? If so, describe:

The Home Energy Upgrades program interacts with the Home Energy Advisors program in customer recruitment and education.

Program Metrics and Indicators (KPIs):

- Total System Benefit (TSB)
 - Energy and demand savings
 - GHG saved
 - Movement towards increasing TSB (% increase from previous year)
 - Movement towards increasing TRC (% increase from previous year)
 - Direct Install Project conversion rate (% of leads that become projects)
- (EQO1a, EQ02a, EQ05b, EQ06b, EQ07b, EQ08b, EQ09a, EQ13a)

Does this program utilize Integrated Demand Side Management (IDSM)?

No

Link to Existing Implementation Plan, if existing:

<https://cedars.cpuc.ca.gov/programs/RRN002/details/>

Program Name: Non-Residential Energy Services

Program ID: RRN015

New / Existing: Existing

Expected Program Duration: 2028 - 2035

Portfolio Segment: Equity

Program Implementer Type: PA

Applicable Sector: Cross

Customer Group(s): Cross cutting

Cutting: Commercial, Public, Industrial, Agricultural

Sector Challenges:

Sector Opportunities (Expected Outcome(s)):

Small businesses and public agencies have limited funds for energy upgrades. There is a limited pool of qualified contractors. The region requires long travel distances from service providers and vendors.

Low market penetration and aging facilities provides a large customer base and opportunities for energy efficiency measures.

Brief Program Description (including customer target, program strategies deployed, expected:

This program serves small HTR businesses, public and tribal facilities, nonprofits, and CBO buildings by providing targeted outreach, technical assessments, incentives, and direct installs to support electrification and EE upgrades. Outreach prioritizes facilities serving equity populations.

<p>Known Equity Concerns in the Selected Markets (if applicable):</p> <p>Many commercial customers are renters with limited control over upgrades, public agencies lack staffing to pursue funding, and rural small businesses have limited capital and access to vendors. Travel distances and contractor scarcity further suppress participation.</p>	<p>Proposed Solutions to Equity Concerns (if applicable): NREN provides personalized engagement with local staff who understand community needs, targets funding support, and simplifies navigation for renters, small jurisdictions, and tribal entities.</p>
<p>Intervention Strategy: Develop a group of participating contractors who are trained in program requirements to provide services directly to customers. Contractors will either recruit customers themselves or NREN staff will engage customers directly and make referrals to contractors when measures are identified.</p>	<p>Delivery Type: Direct Install</p>
<p>Measurement and Verification Methods: Deemed, Custom, NMEC – Population, NMEC - Site</p>	<p>Program Total System Benefit (TSB) for 2028-2031: \$26,180,720.53</p>
<p>Annual Budgets for 2028-2031:</p> <p>2028: 4,330,495.05</p> <p>2029: 4,792,107.38</p> <p>2030: 5,471,584.62</p> <p>2031: 6,548,506.85</p>	<p>Cost Effectiveness (TRC and PAC Test Ratios) for 2028-2031:</p> <p>2028: TRC: 0.23 PAC: 0.24</p> <p>2029: TRC: 0.34 PAC: 0.35</p> <p>2030: TRC: 0.56 PAC: 0.59</p> <p>2031: TRC: 0.63 PAC: 0.67</p>

<p>Anticipated directional and scale changes in budget for years 2032-2035:</p> <p>Anticipate an increase in budget for this program for years 2032-2035, based on program performance during the 2028-2031 cycle.</p>	<p>Market Actors necessary for success: Local contractors, public agency staff, chambers of commerce and other community groups</p>
<p>High-level description of delivery workforce including necessary scale and its risks:</p> <p>Workforce includes NREN staff, participating contractors, public sector partners, and community groups. Risks include difficulty retaining trained contractors, compliance challenges, and attracting contractors to remote areas.</p>	
<p>Near-term Program Output(s) (1-4 years):</p> <p>Increased adoption of electrification and EE measures in small businesses and public facilities, and development of a more robust rural contractor market.</p>	
<p>Long Term Outcome (5-10 years):</p> <p>More efficient and lower cost commercial and community serving buildings, expanded economic opportunities for energy contractors, and long-term cost savings for small businesses and nonprofits.</p>	
<p>Does this program interact with other programs in this PA portfolio? If so, describe:</p> <p>Public Energy Services and Energy Upgrade Financing</p>	
<p>Program Metrics and Indicators (KPIs):</p> <p>Total System Benefit (TSB)</p> <ul style="list-style-type: none"> • Energy and demand savings • GHG saved • Movement towards increasing TSB • Movement towards increasing TRC • Project conversion rate (EQ01b, EQ02b, EQ05f, EQ06f, EQ07d, EQ09b, EQ10b, EQ13b) 	

Does this program utilize Integrated Demand Side Management (IDSM)? No	Link to Existing Implementation Plan, if existing: https://cedars.cpuc.ca.gov/programs/RRN003/details/
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Program Name: Energy Upgrade Financing

Program ID: RRN004

New / Existing: Existing

Expected Program Duration: 2028 - 2035

Portfolio Segment: Equity

Program Implementer Type: PA

Applicable Sector: Cross Cutting: Cross cutting - Finance

Customer Group(s): Cross cutting

Sector Challenges:

First-cost remains one of the most common and persistent barriers to residential, small business and public sector implementation of deep, comprehensive energy efficiency and building decarbonization upgrades. Progress has been made in developing innovative financing products to address the first-cost barrier, but there are gaps that still exist, including minimum loan amount, high costs (interest rates), high minimum credit score hurdles, and sometimes onerous application processes. One of the most attractive loan programs is the OBF programs offered by all of the IOUs. These programs are only for non-residential customers, have a minimum loan amount of \$5,000 with a minimum 10-year payback, and are funded only after completion of construction, leaving the customer to cover costs during construction or

Sector Opportunities (Expected Outcome(s)):

One opportunity is to create financing products that fill gaps, to complement the host of available financing products and also make them more effective. For the PG&E On-Bill Financing (OBF) program, a 0% interest loan paid back on the utility bill, payment to the contractor is often delayed by long project closeout and loan processing. A short-term construction or bridge loan solves the problem of the customer having to have enough cash to pay for the construction before the OBF loan is funded. While this type of financing may be available in the market from traditional lenders and some contractors, it usually carries high interest, higher qualifying criteria, requires a down payment, and may not be applicable to energy efficiency projects. Another opportunity is micro and small loans that cover the cost of energy efficiency projects for homeowners and small businesses. Loan amounts would be less than existing financing programs such as GoGreen and PACE, and would be lower cost than alternatives such as credit cards or manufacturer financing.

pay additional costs for short term construction financing. Additionally, awareness and support for existing loan products may be lower in rural regions than in urban or suburban regions.

Brief Program Description (including customer target, program strategies deployed, expected):

The cross-cutting NREN Finance Program will equitably support the residential, SMB and public sectors in NREN communities through low/no cost loans that will encourage and accelerate the implementation of energy efficiency projects. Loan products will address first-cost and access to capital barriers that exist in rural California and will span gaps in cut IOU and other statewide offerings. The Program will offer bridge loans to complement and improve the effectiveness of IOU OBF. Micro loans will fill a niche in the realm of currently available financing products for loans for EE upgrades below current minimum loan amounts, with easy qualifying and flexible repayment terms.

Bridge loans will provide NREN customers with a means of covering the cost of energy upgrade projects before other funding is received (which may include OBF, incentives/rebates, or other external loans, grants, or financing programs). In the case of OBF, bridge loans will bridge the time gap between time of approval for an IOU's OBF and the disbursement of OBF funds upon verification of the project installation by the OBF program. This gap, which can be months, or in some cases a year or more, can be a significant financial hardship for cash-strapped rural customers. Micro loans will allow customers to implement energy efficiency and decarbonization measures with no out-of-pocket cost.

<p>Known Equity Concerns in the Selected Markets (if applicable):</p> <p>A large portion of NREN's homeowners, small businesses and public agencies are located in low-income communities, are hard-to-reach due to the combination of rural location, number of employees, and/or in leased spaces, and in the case of public agencies may be very small and not as well-funded as urban/suburban agencies. SMBs in rural areas employ a higher portion of local workers than large businesses, highlighting the importance of healthy SMBs to the economic health of rural communities. Credit scores may not be as high in rural areas, and rural areas are served by fewer financial institutions.</p>	<p>Proposed Solutions to Equity Concerns (if applicable): NREN's Energy Upgrade Financing Program will focus on developing financing products that specifically address the identified equity concerns. Marketing and outreach will target equity customers. The program will establish targets that will ensure achieving a high percentage of participation from targeted equity customers.</p>
<p>Intervention Strategy:</p> <ul style="list-style-type: none"> -Design and implement an EE bridge loan product -Design and implement an EE microloan product -Promote financing as a solution to overcome first-cost barriers, focusing on equity-targeted rural customers -Leverage Residential Equity program marketing, education and outreach activities -Leverage Residential DI program outreach and incentives 	<p>Delivery Type: Downstream</p>

<p>-Leverage Nonresidential DI program outreach and incentives</p> <p>-Leverage Public program</p> <p>-Provide a loan concierge service to help customers select the best financing and incentives for their project and assist with loan and incentive applications. AB13</p>	
<p>Measurement and Verification Methods: Other</p>	<p>Program Total System Benefit (TSB) for 2028-2031: N/A</p>
<p>Annual Budgets for 2028-2031:</p> <p>2028: \$929,936.98</p> <p>2029: \$993,843.00</p> <p>2030: \$1,047,870.31</p> <p>2031: \$1,099,299.31</p>	<p>Cost Effectiveness (TRC and PAC Test Ratios) for 2028-2031:</p> <p>TRC: N/A</p> <p>PAC: N/A</p>
<p>Anticipated directional and scale changes in budget for years 2032-2035:</p> <p>Anticipate an increase in budget for this program for years 2032-2035, based on program performance during the 2028-2031 cycle.</p>	<p>Market Actors necessary for success: Local contractors, trade allies, wholesale suppliers, and retailers must be able to support the increase in demand for the promoted EE measures. Depending on the final program design, local lenders may be needed for underwriting and loan funding.</p>
<p>High-level description of delivery workforce including necessary scale and its risks:</p> <p>Delivery workforce will include staff of NREN’s Implementation Partners, including new hires dedicated to program implementation, and third-party design and implementation contractor. Local trade allies will also promote the program and assist customers in applying for financing. Availability and scale of the workforce needed for successful implementation of the program will be the risk.</p>	
<p>Near-term Program Output(s) (1-4 years):</p>	

Program design and launch will have occurred in the previous cycle, hence for the 2028-2031 cycle program outputs include enrollment of rural customers in the financing loan and technical assistance services, leveraging other NREN programming to increase leads and success of project completion.

Long Term Outcome (5-10 years):

Rural customers become comfortable using financing to implement energy efficiency and decarbonization measures, and adoption rates and energy savings in the region increase. Loan default rates are low and significant energy cost savings are realized, especially for equity-targeted small businesses.

Does this program interact with other programs in this PA portfolio? If so, describe:

Yes, client referrals to build on the viability of project completion will come from other NREN programs, including the Home Energy Advisors, Home Energy Upgrades, Nonresidential Energy Services, and Public Energy Services programs.

Program Metrics and Indicators (KPIs):

- Equity-targeted customer participation (including HTR), percentage (EQ01a/b/c/f, EQ13a/b/c/f)
- # of loan applications submitted
- #of loans funded
- Energy savings of projects financed
- All final metrics, targets and indicators will be established after program finalization that will occur in 2026-2027.

Does this program utilize Integrated Demand Side Management (IDSM)?

No

Link to Existing Implementation Plan, if existing:

<https://cedars.cpuc.ca.gov/programs/RRN004/details/>

Program Name: Public Energy Services

Program ID: RRN005

New / Existing: Existing

Expected Program Duration: 2028 - 2035

Portfolio Segment: Equity

Program Implementer Type: PA

Applicable Sector: Public

Customer Group(s): Commercial

Sector Challenges:

Lack of funding, staff capacity, and understanding of available resources.

Sector Opportunities (Expected Outcome(s)):

Increased participation will lead to energy efficiency implementation at public facilities.

Brief Program Description (including customer target, program strategies deployed, expected):

The Public Energy Services program serves rural public agencies by providing equitable access, expertise, technical assistance including benchmarking, energy assessments and funding assistance that will result in project implementation.

Known Equity Concerns in the Selected Markets (if applicable):

HTR public customers in rural areas

Proposed Solutions to Equity Concerns (if applicable):

Provide support in all areas including existing third-party programs and financing.

Intervention Strategy: Marketing and outreach, technical assistance, audits, benchmarking, and staff expertise.

Delivery Type: Downstream

Measurement and Verification

Methods: Other - attendance, completion, placement, certification

Program Total System Benefit (TSB) for 2028-2031:

N/A

Annual Budgets for 2028-2031:

2028: \$2,296,352.09

2029: \$2,431,829.21

Cost Effectiveness (TRC and PAC Test Ratios) for 2028-2031:

TRC: N/A

PAC: N/A

<p>2030: \$2,570,376.92</p> <p>2031: \$2,712,343.09</p>	
<p>Anticipated directional and scale changes in budget for years 2032-2035: Anticipate an increase in budget for this program for the 2032-2035 period, dependent on program performance.</p>	<p>Market Actors necessary for success:</p> <p>Local elected officials</p>
<p>High-level description of delivery workforce including necessary scale and its risks: N/A</p>	
<p>Near-term Program Output(s) (1-4 years):</p> <p>Perform benchmarking, audits, assessments, and provide recommendations for grants and financing for the development of future EE projects.</p>	
<p>Long Term Outcome (5-10 years):</p> <p>Continue from years 1-4 and see the successful implementation of EE projects.</p>	
<p>Does this program interact with other programs in this PA portfolio? If so, describe:</p> <p>This program is complemented by an existing third-party program implemented by Willdan. Public Energy Services will drive public customers to this direct install program.</p>	
<p>Program Metrics and Indicators (KPIs):</p> <p>Number of local government equity customers served, number of projects in which technical assistance is provided, number of buildings benchmarked, number of assessments and reports provided, external funding applications submitted and % of participants in equity segment, by sector (EQ13c).</p>	
<p>Does this program utilize Integrated Demand Side Management (IDSM)?</p> <p>Yes</p>	<p>Link to Existing Implementation Plan, if existing:</p> <p>https://cedars.cpuc.ca.gov/programs/RRN005/details/</p>

Program Name: Energy Career Education and Training

Program ID: RRN006
New / Existing: Existing
Expected Program Duration: 2028 - 2035

Portfolio Segment: Market Support Program Implementer Type: PA

Applicable Sector: Cross Cutting Customer Group(s): Cross Cutting

Sector Challenges: Lack of access to education and training opportunities to expand job opportunities and increase implementation of energy efficiency and electrification measures. Underdeveloped career pathways.	Sector Opportunities (Expected Outcome(s)): Facilitate access to updated training for existing contractors to increase implementation of energy efficiency and electrification projects. Develop and expand career pathway opportunities to support market demand and increase skill and availability of trained workforce.
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Brief Program Description (including customer target, program strategies deployed, expected):

NREN’s Energy Career Education and Training program will facilitate access to career opportunities in clean-energy related markets for individuals in rural HTR, underserved, and low-income communities. This program will leverage existing training programs to upskill the workforce and expand career pathway opportunities or support market demand. The program will also build a regional network of industry professionals who advise on training design, mentor participants, and host job placements, which will ensure that rural communities have a reliable, local workforce capable of meeting current and future clean energy labor demands.

Known Equity Concerns in the Selected Markets (if applicable): High population of HTR customers spread over a wide geographic region. Underrepresentation of certain	Proposed Solutions to Equity Concerns (if applicable): Multifaceted outreach activities throughout the region. Targeted campaigns to work with underrepresented populations. Bi or multi-lingual outreach and training opportunities.
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<p>populations in trained professional roles.</p>	
<p>Intervention Strategy: In-person and online trainings. Marketing, recruitment and guidance into in-person and online training programs as well as internships, pre-apprenticeships, and job placement support. Reimbursement for expenses to attend trainings and achieve certifications.</p>	<p>Delivery Type: Downstream</p>
<p>Measurement and Verification Methods: Other - attendance, completion, placement, certification</p>	<p>Program Total System Benefit (TSB) for 2028-2031: N/A</p>
<p>Annual Budgets for 2028-2031: 2028: \$2,269,871.83 2029: \$2,411,561.33 2030: \$2,517,297.50 2031: \$2,630,781.92</p>	<p>Cost Effectiveness (TRC and PAC Test Ratios) for 2028-2031: TRC: N/A PAC: N/A</p>
<p>Anticipated directional and scale changes in budget for years 2032-2035: Anticipate an increase in budget for this program for the 2032-2035 period, dependent on program performance.</p>	<p>Market Actors necessary for success: Contractors, training institutions, students, job seekers.</p>
<p>High-level description of delivery workforce including necessary scale and its risks: HVAC contractors, general contractors, plumbers, trade professionals, educators, trainers. Finding experienced/willing trainers can be challenging in rural remote areas.</p>	
<p>Near-term Program Output(s) (1-4 years):</p>	

Identify and leverage existing education and training programs. Promote training opportunities. Identify and reduce barriers. identify gaps in career pathways and training opportunities. Facilitate internship, pre-apprenticeship and job placement.

Long Term Outcome (5-10 years):

Increase in contractors and trade professionals trained, certified, and actively completing energy efficiency and electrification projects.

Does this program interact with other programs in this PA portfolio? If so, describe:

Contractor network will be built from contractor participation in all other NREN programs.

Program Metrics and Indicators (KPIs):

Trainings offered, attendance, completion, placement, certification, employment 292
293
EQ3
MS3
MS4
MS5
MS14
MS19

Does this program utilize Integrated Demand Side Management (IDSM)?

No

Link to Existing Implementation Plan, if existing:

<https://cedars.cpuc.ca.gov/programs/RRN006/details/>

Proceeding: A.26-03-XXX

Exhibit No.: NREN-03

Date: March 16, 2026

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

NREN

CEDARS FILING LINKS AND RECEIPTS

EXHIBIT 3: CEDARS Filing Links and Receipts

Filing Links

<https://cedars.cpuc.ca.gov/filings/dashboard/RRN/2028/>

<https://cedars.cpuc.ca.gov/filings/dashboard/RRN/2029/>

<https://cedars.cpuc.ca.gov/filings/dashboard/RRN/2030/>

<https://cedars.cpuc.ca.gov/filings/dashboard/RRN/2031/>

CEDARS FILING SUBMISSION RECEIPT

The RRN portfolio budget filing has been submitted and is now under review. A summary of the budget filing is provided below.

PA: Rural REN North (RRN)

Budget Filing Year: 2028

Submitted: 12:35 on 13 Mar 2026

By: Patricia Terry

Advice Letter Number:

* Portfolio Budget Filing Summary *

- TRC: 0.32
- PAC: 0.32
- TRC (no admin): 1.44
- PAC (no admin): 1.5
- RIM: 0.53
- SCB: 0.47
- SCH: 0.47
- Budget: \$18,691,870.19
- TotalSystemBenefit: \$4,496,530.86
- ElecBen: \$1,456,484.51
- GasBen: \$5,284,103.59
- WaterEnergyBen: \$4,262.90
- OtherBen: \$14,242.04
- TRCCost: \$20,993,085.33
- PACCost: \$20,822,757.79
- RIMCost: \$31,276,785.00
- SCBCost: \$21,863,186.97
- SCHCost: \$21,928,861.74
- ElecSupplyCost: \$2,190,747.75
- GasSupplyCost: \$0.00
- WaterEnergyCost: \$0.00
- OtherCost: \$71,814.43

* Programs Included in the Budget Filing *

- RRN001: Home Energy Advisors
- RRN004: Energy Upgrade Financing
- RRN005: Public Energy Services
- RRN006: Energy Career Education and Training
- RRN009_Equity_PortfolioSupport: Equity Portfolio Support
- RRN011_EMV: EM&V;
- RRN013_MS_PortfolioSupport: Market Support Portfolio Support
- RRN014: Home Energy Upgrades
- RRN015: Non-Residential Energy Services

CEDARS FILING SUBMISSION RECEIPT

The RRN portfolio budget filing has been submitted and is now under review. A summary of the budget filing is provided below.

PA: Rural REN North (RRN)

Budget Filing Year: 2029

Submitted: 12:35 on 13 Mar 2026

By: Patricia Terry

Advice Letter Number:

* Portfolio Budget Filing Summary *

- TRC: 0.4
- PAC: 0.4
- TRC (no admin): 1.51
- PAC (no admin): 1.57
- RIM: 0.61
- SCB: 0.57
- SCH: 0.57
- Budget: \$20,411,562.32
- TotalSystemBenefit: \$6,244,313.87
- ElecBen: \$1,986,159.73
- GasBen: \$7,385,041.77
- WaterEnergyBen: \$5,191.04
- OtherBen: \$15,585.79
- TRCCost: \$23,604,493.14
- PACCost: \$23,392,886.90
- RIMCost: \$37,404,344.62
- SCBCost: \$24,783,406.33
- SCHCost: \$24,809,460.50
- ElecSupplyCost: \$3,049,328.43
- GasSupplyCost: \$0.00
- WaterEnergyCost: \$0.00
- OtherCost: \$98,336.04

* Programs Included in the Budget Filing *

- RRN001: Home Energy Advisors
- RRN004: Energy Upgrade Financing
- RRN005: Public Energy Services
- RRN006: Energy Career Education and Training
- RRN009_Equity_PortfolioSupport: Equity Portfolio Support
- RRN011_EMV: EM&V;
- RRN013_MS_PortfolioSupport: Market Support Portfolio Support
- RRN014: Home Energy Upgrades
- RRN015: Non-Residential Energy Services

CEDARS FILING SUBMISSION RECEIPT

The RRN portfolio budget filing has been submitted and is now under review. A summary of the budget filing is provided below.

PA: Rural REN North (RRN)

Budget Filing Year: 2030

Submitted: 12:36 on 13 Mar 2026

By: Patricia Terry

Advice Letter Number:

* Portfolio Budget Filing Summary *

- TRC: 0.49
- PAC: 0.5
- TRC (no admin): 1.5
- PAC (no admin): 1.57
- RIM: 0.62
- SCB: 0.7
- SCH: 0.7
- Budget: \$23,740,453.45
- TotalSystemBenefit: \$9,625,258.08
- ElecBen: \$3,089,082.76
- GasBen: \$10,464,269.61
- WaterEnergyBen: \$8,447.25
- OtherBen: \$20,243.92
- TRCCost: \$27,834,414.13
- PACCost: \$27,422,693.34
- RIMCost: \$48,506,694.34
- SCBCost: \$29,331,694.84
- SCHCost: \$29,335,835.91
- ElecSupplyCost: \$3,789,029.70
- GasSupplyCost: \$0.00
- WaterEnergyCost: \$0.00
- OtherCost: \$167,755.75

* Programs Included in the Budget Filing *

- RRN001: Home Energy Advisors
- RRN004: Energy Upgrade Financing
- RRN005: Public Energy Services
- RRN006: Energy Career Education and Training
- RRN009_Equity_PortfolioSupport: Equity Portfolio Support
- RRN011_EMV: EM&V;
- RRN013_MS_PortfolioSupport: Market Support Portfolio Support
- RRN014: Home Energy Upgrades
- RRN015: Non-Residential Energy Services

CEDARS FILING SUBMISSION RECEIPT

The RRN portfolio budget filing has been submitted and is now under review. A summary of the budget filing is provided below.

PA: Rural REN North (RRN)

Budget Filing Year: 2031

Submitted: 12:36 on 13 Mar 2026

By: Patricia Terry

Advice Letter Number:

* Portfolio Budget Filing Summary *

- TRC: 0.63
- PAC: 0.64
- TRC (no admin): 1.58
- PAC (no admin): 1.65
- RIM: 0.74
- SCB: 0.88
- SCH: 0.88
- Budget: \$26,791,986.52
- TotalSystemBenefit: \$14,505,978.16
- ElecBen: \$4,359,736.67
- GasBen: \$16,385,663.03
- WaterEnergyBen: \$12,517.73
- OtherBen: \$27,497.37
- TRCCost: \$33,240,800.28
- PACCost: \$32,699,300.83
- RIMCost: \$63,179,130.08
- SCBCost: \$35,571,089.27
- SCHCost: \$35,575,921.20
- ElecSupplyCost: \$6,045,660.80
- GasSupplyCost: \$0.00
- WaterEnergyCost: \$0.00
- OtherCost: \$233,775.84

* Programs Included in the Budget Filing *

- RRN001: Home Energy Advisors
- RRN004: Energy Upgrade Financing
- RRN005: Public Energy Services
- RRN006: Energy Career Education and Training
- RRN009_Equity_PortfolioSupport: Equity Portfolio Support
- RRN011_EMV: EM&V;
- RRN013_MS_PortfolioSupport: Market Support Portfolio Support
- RRN014: Home Energy Upgrades
- RRN015: Non-Residential Energy Services

Proceeding: A.26-03-XXX

Exhibit No.: NREN-04

Date: March 16, 2026

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

NREN
TESTIMONY APPENDICES

APPENDIX A – STATEMENTS OF QUALIFICATION

APPENDIX B – SUPPLEMENTAL BUDGET INFORMATION NARRATIVE

APPENDIX C – LETTERS OF SUPPORT

APPENDIX D – ORDERING PARAGRAPH 2 STATEWIDE ASSESSMENT + SURVEY

**APPENDIX E – ORDERING PARAGRAPH 23 DEMOGRAPHIC DATA REPORTING
DELIVERABLE**

APPENDIX A
STATEMENTS OF QUALIFICATION

STATEMENT OF QUALIFICATIONS OF Stephen Kullmann
2028-2031 Portfolio Plan and 2032-2035 Business Plan
Redwood Coast Energy Authority
633 Third Street
Eureka, CA 95501
707.269.1700 skullmann@redwoodenergy.org

Description of responsibilities

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

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

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

Summary of educational and professional background

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

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

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

633 Third St, Eureka, CA 95501

Description of responsibilities

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

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

Summary of educational and professional background

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

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

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

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

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

Description of responsibilities

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

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

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

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

Summary of educational and professional background

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

Bachelor of Science, California State University, Long Beach.

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

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

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

Description of responsibilities

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

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

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

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

Summary of educational and professional background

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

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

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

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

Description of responsibilities

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

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

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

Summary of educational and professional background

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

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

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

APPENDIX B
SUPPLEMENTAL BUDGET INFORMATION NARRATIVE

ATTACHMENT B

Supplemental Budget Information

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

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

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

Attachment B

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

I. BACKGROUND:

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

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

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

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

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

1. Functions conducted by each department/organization

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

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

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

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

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

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

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

2. Energy Efficiency Management Structure and Org Chart

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

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

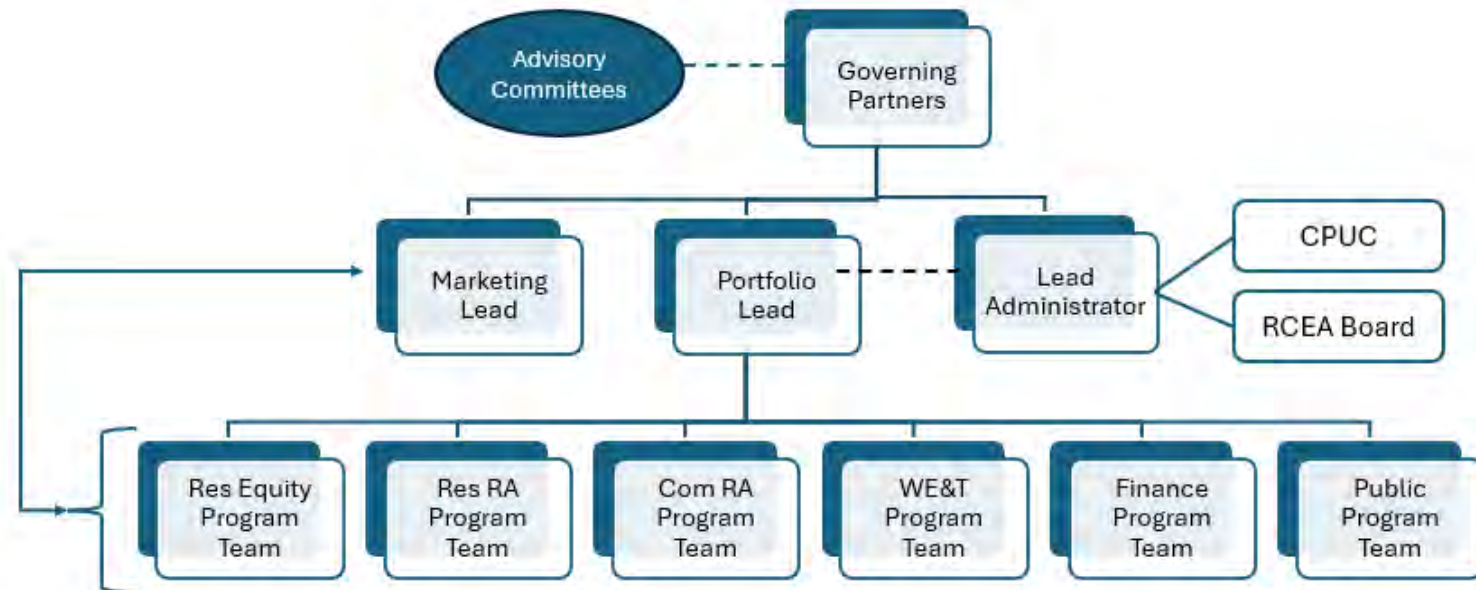


Figure 1: Revised Organizational Structure

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

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

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

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

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

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

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

6. Explanation of method for forecasting costs

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

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

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

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

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

C. Table showing costs by functional area of management structure

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

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

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

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

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

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

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

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

1. Identify any capital costs

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

E. Table showing cost drivers across the EE organization

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

Administrative and Organizational Cost Drivers

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

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

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

Implementation Cost Drivers

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

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

F. Table E: Cost drivers across the EE organization

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

III. BUDGET TABLES INCLUDING INFORMATION IDENTIFIED IN THE SCOPING MEMO

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

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

The Scoping Memo requests:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

APPENDIX C
LETTERS OF SUPPORT

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

Letters of Support include:

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

- City of Lakeport

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



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

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

Dear President Reynolds:

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

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

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

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



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

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

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

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

Sincerely,

Jan Maes

Executive Director
[Sierra Energy Reimagined](http://www.sierraenergyreimagined.org)
12511 Loma Rica Drive
Grass Valley, CA 95945
603-305-9441



SHASTA COUNTY

MATT PLUMMER, DISTRICT 4 SUPERVISOR

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

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

March 10, 2026

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

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

Dear President Reynolds;

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

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

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

Sincerely,

Matt Plummer
Supervisor, District 4
County of Shasta

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

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

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Assembly California Legislature



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

February 13, 2026

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

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

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

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

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

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

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

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

Sincerely,

A handwritten signature in black ink that reads "Cecilia M. Aguiar-Curry". The signature is written in a cursive, flowing style.

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

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

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

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

Dear President Reynolds:

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

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

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

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

Sincerely,

Eileen Mitro

Climate Action Mendocino



Providing help
Creating hope

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

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

Dear President Reynolds,

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

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

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

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

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

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

Sincerely,

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

John Watkins

Executive Director

Catholic Charities of Yolo-Solano

jwatkins@ccyoso.org



736 F Street
Arcata CA 95521

City Manager
707-822-5953

Environmental Services
707-822-8184

Police
707-822-2428

Recreation
707-822-7091

Community Development
707-822-5955

Finance
707-822-5951

Engineering
707-825-2128

Transportation
707-822-3775

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

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

Dear President Reynolds:

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

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

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

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

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

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

Sincerely,



Kimberly White
Mayor
City of Arcata



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

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

Dear President Reynolds,




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

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

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

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

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

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

CITYOFDAVIS.ORG

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

Sincerely,



Stan Gryczko, Assistant City Manager

February 2, 2026

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

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

Dear President Reynolds:

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

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

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

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

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

Sincerely,

Kim Bergel, Mayor





CITY OF GRASS VALLEY
Public Works Department

Public Works
530-274-4350

125 East Main Street
Grass Valley, CA 95945

January 20, 2026

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

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

Dear President Reynolds:

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

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

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

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

Sincerely,

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



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

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

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

Dear President Reynolds,

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

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

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

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

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

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

Sincerely,

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

Ken Hiatt
City Manager



COUNTY OF YOLO

Board of Supervisors

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

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

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

January 29, 2026

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

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

Dear President Reynolds:

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

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

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

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

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

Sincerely,

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

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

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

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

Dear President Reynolds,

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

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

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

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

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

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

Sincerely,

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





COUNTY OF MENDOCINO

Board of Supervisors

JOHN HASCHAK
THIRD DISTRICT SUPERVISOR

501 Low Gap Rd. Room 1010
Ukiah, CA 95482

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

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

February 8, 2026

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

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

Dear President Reynolds:

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

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

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

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

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

Sincerely,

John Haschak
3rd District Supervisor
Mendocino County

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

February 24, 2026

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

Dear President Reynolds:


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

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

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

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

Sincerely,


JARED HUFFMAN
Member of Congress



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

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

February 10, 2026

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

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

Dear President Reynolds,

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

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

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

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

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

Sincerely,



Brad Rasmussen
Chair, Lake County Board of Supervisors



Lake Family Resource Center
Strengthening Families

February 2, 2026

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

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

Dear President Reynolds,

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

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

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

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

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

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

Sincerely,

A handwritten signature in blue ink that reads "Lisa Morrow". The signature is fluid and cursive, with the first name "Lisa" being more prominent than the last name "Morrow".

Lisa Morrow
Executive Director
Lisam@lakefrc.org



LAKE COUNTY/CITY AREA PLANNING COUNCIL

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

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

1/14/2026

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

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

Dear President Reynolds,

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

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

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

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

Sincerely,

A handwritten signature in black ink that reads "Lisa Davey-Bates".



Trinity County Office of Education

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

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

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

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

Dear President Reynolds;

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

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

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

Sincerely,

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

Fabio Robles, Ed. D
Trinity County Superintendent of Schools



CITY OF BLUE LAKE

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

February 10, 2026

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

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

Dear President Reynolds;

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

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

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

Sincerely,

John Sawatsky
Mayor



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

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

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

Dear President Reynolds:

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

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

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

Sincerely,

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

Brian Martinez

Assistant Superintendent/CBO



MARIPOSA COUNTY

Board of Supervisors



RESOLUTION - ACTION REQUESTED 2026-80

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

RECOMMENDATION AND JUSTIFICATION

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

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

BACKGROUND AND HISTORY OF BOARD ACTIONS

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

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION

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

FINANCIAL IMPACT

None

ATTACHMENTS

1. Letter of Support

VOTE RESULT

RESULT: **Adopted (UNANIMOUS)**

MOVER: District I Supervisor Rosemarie Smallcombe

SECONDER: District IV Supervisor Jenni Kiser

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

EXCUSED: District V Supervisor Miles Menetrey

Mariposa County Board of Supervisors



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

JOE LYNCH
County Administrative Officer

DANIELLE BONDSHU
Clerk of the Board

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

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

February 17, 2026

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

Dear President Reynolds:

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

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

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

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

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

Sincerely,



Danette Toso, Chair
Board of Supervisors

California State Senate

SENATOR MIKE MCGUIRE

PRESIDENT PRO TEMPORE EMERITUS

NORTHERN CALIFORNIA'S SECOND SENATE DISTRICT



February 10, 2026

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

Dear President Reynolds:

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

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

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

Warmest Regards,

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

MIKE MCGUIRE

Senator



January 16, 2026

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

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

Dear President Reynolds:

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

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

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

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

Sincerely,



John Baggett
Superintendent

COUNTY OF NEVADA
STATE OF CALIFORNIA
BOARD OF SUPERVISORS



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

Tine Mathiasen, Chief Deputy Clerk of the Board

February 13, 2026

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

RE: Support – Northern Rural Energy Network Programs

Dear President Reynolds:

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

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

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

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Lisa Swarthout".

Lisa Swarthout, Chair
Nevada County Board of Supervisors

BLUE LAKE RANCHERIA

P.O. Box 428
Blue Lake, CA 95525

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

www.bluelakerancheria-nsn.gov



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

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

Dear President Reynolds:

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

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

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

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

BLUE LAKE RANCHERIA

P.O. Box 428
Blue Lake, CA 95525

Office: (707) 668-5101
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lines have compounded to make it harder to serve these rural areas, which is why NREN's model of locally designed and implemented programs is so essential.

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

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

Sincerely,

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

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



January 15, 2026

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

Dear President Reynolds:

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

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

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

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Ron Walker", is written over the word "Sincerely,".

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

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



Mayor Barbara Burkey
Vice-Mayor Dan Doyle
Councilmember Anna Dobbins
Councilmember Jim Koogle
Councilmember Jeff Hansen
City Manager Molly Haviland

February 23, 2026

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

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

Dear President Reynolds:

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

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

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

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

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

Sincerely,



Barbara Burkey

Mayor, City of Point Arena



February 25, 2026

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

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

Dear Commissioners,

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

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

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

We are particularly supportive of NREN's focus on:

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



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

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

Sincerely,

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

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

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

E-MAIL
Assemblymember.Rogers@assembly.ca.gov



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

March 2, 2026

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

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

Dear President Reynolds,

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

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

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

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

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

Sincerely,

A handwritten signature in black ink that reads "Chris Rogers". The signature is written in a cursive, flowing style.

CHRIS ROGERS
Assemblymember, District 2
CR:hm



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

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

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

Dear President Reynolds:

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

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

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

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

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

Sincerely,

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

Felicia Smith
Director of Customer Energy Solutions

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

California State Senate

SENATOR
CHRISTOPHER CABALDON
THIRD SENATE DISTRICT



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

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

Dear President Reynolds,

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

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

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

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

Sincerely,

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

CHRISTOPHER CABALDON
Senator, 3rd District



COUNTY OF HUMBOLDT
COUNTY ADMINISTRATIVE OFFICE
825 5th Street, Suite 112, Eureka, CA 95501-1153
Telephone (707) 445-7266 Fax (707) 445-7299
cao@co.humboldt.ca.us

Feb. 13, 2026

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

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

Dear President Reynolds:

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

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

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

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

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

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

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

Sincerely,



Elishia Hayes
Humboldt County Administrative Officer

February 1, 2026

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

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

Dear President Reynolds:

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

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

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

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

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

Sincerely,

Alan W. "Skip" Jorgensen

BURNT RANCH ELEMENTARY SCHOOL DISTRICT



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

Amanda Platt, Superintendent
Kristi Holland, Principal

Phone: 530.629.2543
www.bresd.org

Katie Strouse, Business Manager
Angela Wiltse, Administrative Assistant

March 13, 2026

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

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

Dear President Reynolds;

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

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

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

Sincerely,

Amanda Platt
Superintendent



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

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

Dear President Reynolds,

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

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

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

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

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

Sincerely,
Rebecca Kuczynski

Chief Customer Officer
Valley Clean Energy

WILLITS SENIORS, INC.

1501 Baechtel Road · Willits CA 95490

707-459-6826 · 707-459-1772 (fax)

HARRAH SENIOR CENTER

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

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

Dear President Reynolds:

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

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

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

Sincerely, Richard Baker Executive Director Willits Seniors Inc.

Richard Baker



Yolo County Housing Authority

147 W. Main Street
Woodland, CA 95695

Woodland: (530) 662-5428

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

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

Dear President Reynolds,

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

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

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

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

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



Yolo County Housing Authority

147 W. Main Street
Woodland, CA 95695

Woodland: (530) 662-5428

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

Sincerely,

Ian Evans

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

CITY OF LAKEPORT

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



1/12/2026

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

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

Dear President Reynolds,

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

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

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

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

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

Sincerely,

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

Brandon Disney,
Mayor
City of Lakeport

cc: Lakeport City Council Members

APPENDIX D

ORDERING PARAGRAPH 2 STATEWIDE ASSESSMENT + SURVEY

Statewide Energy Efficiency Program Assessment Criteria

D.23-06-055 OP2 Statewide Assessment Framework

February 12, 2026

Overview Of PA Coordination Through a Working Group Process

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

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

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

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

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

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

Supporting Information

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

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

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

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

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

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

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

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

OBJECTIVE

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

Program outcomes of the framework include:

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

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

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

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

GUIDELINES FOR ASSESSMENT

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

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

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

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

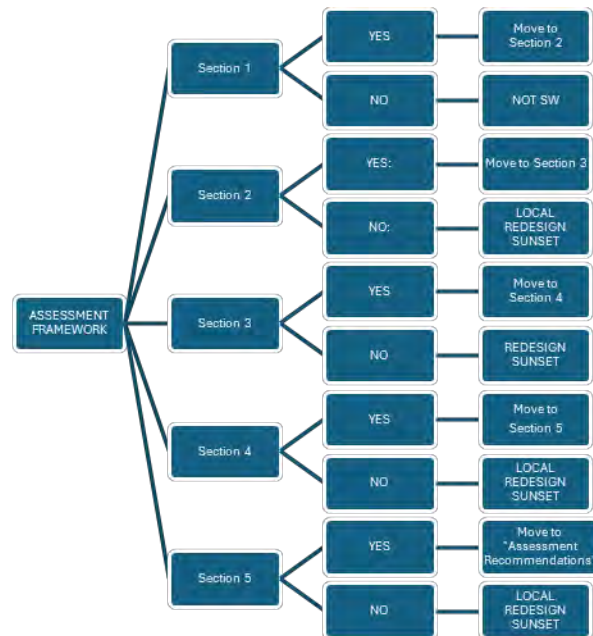
¹¹ *Equity Criteria:* The use of the term disadvantaged is in the context of Disadvantaged Communities (or DACs) as identified by the California Environmental Protection Agency pursuant to Health and Safety Code Section 39711. With respect to the use of the terms underserved and hard-to-reach, these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

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

STATEWIDE ASSESSMENT FRAMEWORK

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

Figure 1. Overall Decision-Making Framework



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

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

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

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

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

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

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

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

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

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

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

For NEW and EXISTING PROGRAMS which pass Section 1, CONTINUE

Section 2. Delivery Model and Risk Evaluation

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

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

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

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

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

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

Section 3. Strategic Fit

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

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

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

Section 4. Performance and Accountability Assessment (EXISTING)

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

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

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

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

Section 5. Market Support & Equity Assessment

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

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

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

ASSESSMENT RECOMMENDATIONS

Summary of the above scoring system, and assessment recommendation.

Suggested Program Reclassification Options

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

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

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

SELECTION/TRANSITION OF LEAD PA

Stakeholder Involvement

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

Qualification Criteria:

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

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

NEW PROGRAM PA SELECTION PROCESS :

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

TRANSITIONING PROGRAMS PROCESS (transitioning programs):

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

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

Appendix A

Issues Needing Further Development and/or Clarification by the Commission

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

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

Action Item: Formal Commission input warranted.

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

Action Item: Formal Commission input warranted.

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

Action Item: Formal Commission input warranted.

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

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

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

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

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

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

Appendix B
PA Survey
Updated 2/12/2026

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

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

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

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

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

- Yes
- **Qualified Support**
- No

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

Your explanation will help stakeholders understand your perspective.

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

Optional: Share any other thoughts or recommendations.

NREN

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

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

Northern Rural Regional Energy Network (NREN)

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

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

- Yes
- **Qualified Support**
- No

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

Your explanation will help stakeholders understand your perspective.

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

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

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

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

Optional: Share any other thoughts or recommendations.

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

BayREN

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

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

BayREN

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

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

Qualified Support

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

Your explanation will help stakeholders understand your perspective.

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

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

Optional: Share any other thoughts or recommendations.

3C-REN

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

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

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

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

- Yes
- **Qualified Support**
- No

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

Your explanation will help stakeholders understand your perspective.

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

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

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

Optional: Share any other thoughts or recommendations.

SoCalREN

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

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

Southern California Regional Energy Network (SoCalREN)

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

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

- Yes
- **Qualified Support**
- No

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

Your explanation will help stakeholders understand your perspective.

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

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

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

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

Optional: Share any other thoughts or recommendations.

None at this time.

MCE

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

MCE

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

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

- Yes
- **Qualified Support**
- No

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

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

Other comments will be provided in MCE’s testimony.

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

Optional: Share any other thoughts or recommendations.

SDREN

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

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

San Diego Regional Energy Network

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

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

- Yes
- **Qualified Support**
- No

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

Your explanation will help stakeholders understand your perspective.

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

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

Optional: Share any other thoughts or recommendations.

I-REN

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

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

Inland Regional Energy Network (I-REN)

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

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

- Yes
- **Qualified Support**
- No

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

Your explanation will help stakeholders understand your perspective.

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

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

Optional: Share any other thoughts or recommendations.

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

CCR REN

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

Central California Rural Regional Energy Network (CCR REN)

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

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

- Yes
- **Qualified Support**
- No

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

Your explanation will help stakeholders understand your perspective.

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

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

Optional: Share any other thoughts or recommendations.

Not at this time.

SDG&E

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

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

SDG&E

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

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

- Yes
- **Qualified Support**
- No

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

Your explanation will help stakeholders understand your perspective.

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

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

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

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

Optional: Share any other thoughts or recommendations.

SCE

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

Southern California Edison

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

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

- Yes
- **Qualified Support**
- No

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

Your explanation will help stakeholders understand your perspective.

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

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

Optional: Share any other thoughts or recommendations.

SoCalGas

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

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

SoCalGas

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

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

- Yes
- **Qualified Support**
- No

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

Your explanation will help stakeholders understand your perspective.

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

Optional: Share any other thoughts or recommendations.

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

PG&E

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

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

PG&E

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

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

- Yes
- **Qualified Support**
- No

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

Your explanation will help stakeholders understand your perspective.

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

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

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

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

Optional: Share any other thoughts or recommendations.

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

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

APPENDIX E

ORDERING PARAGRAPH 23 DEMOGRAPHIC DATA REPORTING DELIVERABLE

Background

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

Questions within Section 7.7 include:

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

Process

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

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

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

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

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

¹¹ 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: - 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. 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.
PCE	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 Reprots (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 EECOP 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 RGEEP	<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.
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.
CCRREN	If CCR REN recommendations are adopted where Site Address is used to map against census tract data in aggregate and additional demographics are collected during EM&V no additional demographic information is required and thus no timelines are applicable. Should the CPUC disagree with CCR REN recommendations, we agree with PG&E's recommended timeline.
IREN	We would suggest quarterly.
MCE	Agree with PG&E
NREN	Annually would be best in the Annual Report using the annual claim, but quarterly with Claims at most, or alongside EM&V reporting.
PG&E	Annual reporting for metrics and quarterly reporting for claims related data should be sufficient.
SCE	All overarching reporting should be no more frequent than quarterly but for this type of data, annual information is probably the most relevant.
SCG	Agree with PG&E
SDG&E	SDG&E concurs with PG&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."