

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

Application of the Western Riverside Council
of Governments for Approval of the Inland
Regional Energy Network (CPUC ID 246)
2028-2031 Portfolio Plan and 2032-2035
Business Plan.

Application 26-03-
(Filed March 16, 2026)

**APPLICATION OF WESTERN RIVERSIDE COUNCIL OF GOVERNMENTS FOR
APPROVAL OF THE INLAND REGIONAL ENERGY NETWORK (CPUC ID 246)
2028-2031 PORTFOLIO PLAN AND 2032-2035 BUSINESS PLAN**

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Dated: March 16, 2026 in Riverside, California

Table of Contents

I. Introduction..... 1

II. Background 2

III. Summary of I-REN’s Request 4

 Exhibit 1: 2028-2031 Portfolio Plan and 2032-2035 Business Plan..... 5

 Exhibit 2: Program Cards 6

 Exhibit 3: CEDARS Filing Links and Receipts 6

 Exhibit 4: Appendices 6

IV. The Commission Should Approve I-REN’s Proposed Portfolio..... 6

 The I-REN Portfolio Directly Supports the Commission’s Policy Objectives and Local
 Communities’ Needs 7

 I-REN is an Established Portfolio Administrator with Interrelated Programs Tailored for Long-
 term Regional Capacity-Building..... 9

 The I-REN Portfolio Complies with REN Criteria and is Coordinated with Other PAs to
 Ensure Complementarity and Avoid Harmful Duplication..... 10

 The I-REN Portfolio Is Consistent with the Portfolio Segmentation Direction for RENs and
 Proposed Sectors align with Commission Guidance on REN Strengths 12

 The I-REN Proposed Budget Is Reasonable, Complies with Commission Guidance on REN
 Budgets, and Should Be Approved 14

 1. I-REN Budget and Savings Forecasts..... 16

 The I-REN Portfolio Provides Unique Value and Is Designed to Increase Equity, Market
 Support, and Codes & Standards Compliance 18

V. Portfolio Plan and Programs 24

**VI. Request for Continued Authorization for Southern California Edison and Southern
 California Gas to Collect and Disburse Funds to I-REN 26**

VII. Policy Recommendations.....	26
VIII. Compliance with Commission Rules of Practice and Procedure	27
Relief Sought, Statutory and Other Authority, and Verification – Rule 2.1	27
1. Request for Relief – Rule 2.1.....	27
2. Statutory Authority– Rule 2.1.....	28
3. Verification– Rule 2.1.....	28
Legal Name, Location, and State of Organization – Rule 2.1(a)	28
4. Legal Name and Principal Place of Business – Rule 2.1(a)	28
Correspondence and Communication Regarding This Application - Rule 2.1.(b)	29
Proposed Categorization, Need for Hearing, Issues to Be Considered, Proposed Schedule (Rule 2.1(c))	30
5. Categorization – Rule 2.1(c).....	30
6. Need for Hearing - Rule 2.1(c)	30
7. Issues to be Considered - Rule 2.1(c)	31
8. Proposed Schedule – Rule 2.1(c).....	31
Organization and Qualification to Transact Business– Rule 2.2	32
Notice and Service of Application	32
IX. Conclusion	32
X. Verification	34

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I. INTRODUCTION

The Western Riverside Council of Governments on behalf of the Inland Regional Energy Network (I-REN, CPUC ID 246) respectfully submits this Application requesting California Public Utilities Commission (CPUC or Commission) approval of I-REN’s 2028–2031 Portfolio Plan and 2032–2035 Business Plan and continued authorization to administer the I-REN Regional Energy Network portfolio for the 2028–2035 program cycle. I-REN requests that the Commission approve a budget cap for 2028-2035 of approximately \$178.6 Million across the eight-year planning period, which includes two four-year portfolio cycles: 2028-2031 and 2032-2035.

This Application is filed in accordance with Commission Decision (D.) 21-05-031, Ordering Paragraph (OP) 5, and D.23-06-055, OP 2, which directed all energy efficiency (EE) portfolio administrators (PAs) to file EE business plan and portfolio applications every four years

by February 15, beginning in 2022.¹ The Commission granted an extension to all PAs, allowing applications to be filed no later than March 16, 2026.² As such, this Application is timely filed.

II. BACKGROUND

I-REN (CPUC ID #246) is a Regional Energy Network (REN) portfolio administrator previously authorized by the Commission in D.21-11-013 Approval of Inland Regional Energy Network Energy Efficiency Business Plan, which funded I-REN to offer EE programs for a unique six-year portfolio period of 2022-2027. I-REN is administered by the Western Riverside Council of Governments (WRCOG) as the Administrative Lead Agency in collaboration with Coachella Valley Association of Governments (CVAG), and San Bernardino Council of Governments (SBCOG). I-REN serves local governments and communities across Riverside and San Bernardino Counties.

The I-REN service territory covers over 27,000 square miles – an area nearly the size of the state of South Carolina – with a range of communities, populations, and needs. Vast areas of the region are historically underserved by traditional IOU and other PA programs as they are far away from major cities, have a lack of an available workforce, and socio-economic barriers make them less attractive to travel to provide services. I-REN, as a local government coalition, has a mission to equitably serve these outlying communities. Moreover, these communities are already part of the I-REN governing agencies’ organizational structures and can be more effectively engaged and served through I-REN than any other existing organization.

¹ Decision (D.) 21-05-031 OP 5 (May 26, 2021) (directing all energy efficiency portfolio administrators to file energy efficiency business plan and portfolio applications every four years by February 15, beginning in 2022); D.23-06-055, OP 2 (Jul. 3, 2023).

² Letter from Commission Executive Director Rachel Peterson, Re: Request for Extension of Time to Comply with Decision 21-05-031 OP 5 and OP 2 of D.23-06-055, dated December 15, 2025.

I-REN’s currently approved portfolio includes EE programs in the public sector as well as cross-cutting programs for workforce education and training and C&S. For the 2028–2035 cycle, I-REN proposes to maintain and grow the same set of programs, continuing to build long-term regional infrastructure that helps public agencies and building professionals implement EE, building decarbonization, and resiliency projects in the region, with a focus on Commission objectives of affordability, equity, and grid benefits.

The regulatory context for I-REN’s Application includes landmark decision D.21-05-031 that reimagined the rolling portfolio framework, in which the Commission ordered significant changes including but not limited to the following: adopted a new Total System Benefit (TSB) metric,³ ordered four- and eight-year portfolio filings,⁴ directed that budgets are fungible across the portfolio period,⁵ and uplifted crucial needs for equity and market support (E&MS) within the statewide EE portfolio by establishing portfolio segmentation according to primary purpose of programs.⁶

In D.21-05-031 the Commission ordered PAs to refile four-year portfolio plans and eight-year strategic business plans in 2022 and every four years after that.⁷ However, due to the timing of I-REN’s business plan submittal in February 2021, prior to issuance of D.21-05-031, I-REN was exempted from the 2022 filing requirement⁸ and instead approved for a unique, six-year portfolio period of 2022-2027 in order to align with other PAs in this 2026 filing for 2028-2035.⁹

³ D.21-05-031 OP 1

⁴ D.21-05-031 at 81-82, OP 5.

⁵ D.21-05-031 at 77, Conclusion of Law (COL) 24.

⁶ D.21-05-031 OP 2.

⁷ D.21-05-031 OP 5.

⁸ D.21-11-013 COL 1 and OP 6.

⁹ D.21-11-013 at 11.

Other important regulatory context for this filing includes existing and forthcoming rules and requirements for RENs and the equity and market support segments of the portfolio. D.19-12-021 updated the threshold criteria for REN program activities¹⁰ and established expectations for new REN proposals, including the development of REN unique value metrics.¹¹

More recently, after the other PAs refiled their business plans in 2022 the Commission issued another pivotal decision, D.23-06-055, setting in motion numerous joint PA and stakeholder initiatives. Many of those orders focus on developing methodologies to measure progress toward equity and market support objectives, quantify non-energy benefits and encourage community involvement in EE programs. These forthcoming indicators and goals will be important accountability mechanisms for RENs¹² in addition to existing REN rules and unique value metrics described in D.19-12-021.

I-REN prepared this Application in compliance with D.19-12-021, D.21-05-031, and D.23-06-055 and in alignment with the guidance and templates provided by Energy Division.¹³

III. SUMMARY OF I-REN'S REQUEST

This Application requests Commission approval of approximately \$81.4 Million for I-REN's 2028–2031 Portfolio Plan and \$97.2 Million for its 2032–2035 Business Plan, consistent with Commission guidance for RENs and the EE portfolio regulatory requirements as described in the preceding section.

¹⁰ D.19-12-021 OP 4.

¹¹ D.19-12-021 at 23.

¹² D.23-06-055 at 71.

¹³ Energy Division provided templates to PAs via email (narrative template provided 2/4/26 and workbook template provided 3/2/26)

This Application is accompanied by four testimony exhibits described below and filed as supplemental documents in the CPUC e-file portal, as well as concurrent budget filing in the California Energy Data and Reporting System (CEDARS). The Application components are made available on I-REN's website at <https://iren.gov/175/Documents-Recordings> and noticed to the current EE proceeding (R.25-04-010) and previous consolidated application proceeding (A.22-02-005).

Collectively, this filing positions I-REN as a proven regional PA establishing a long-term and sustainable framework for EE, workforce education and training, and code compliance enhancement in the Inland Empire.

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

This exhibit contains I-REN's responses to the Energy Division template, including Executive Summary and Portfolio Summary with I-REN governance and service territory factors, and application tables.

Also included are Portfolio Strategies showing how I-REN proposes to continue and enhance its support Commission objectives, e.g., affordability, meter-based savings, workforce education and training, integrated demand side management, and advancing the CPUC Environmental and Social Justice (ESJ) Action Plan.

Exhibit 1 also contains I-REN's savings and zero-based budget forecast methodology, portfolio management approaches aligned with unique value metrics and risk mitigation, and segmentation and sector strategies.

Also included in Exhibit 1 are I-REN’s portfolio coordination practices, stakeholder engagement results and impact on I-REN portfolio planning, evaluation study plans and budget methodology, and recommendations for new or modified policies.

Exhibit 2: Program Cards

This exhibit contains program cards for each of I-REN’s programs proposed to continue in 2028 and beyond.

Exhibit 3: CEDARS Filing Links and Receipts

This exhibit contains links to I-REN’s filing in CEDARS and cost-effectiveness tool run receipts for 2028-2031.

Exhibit 4: Appendices

This exhibit contains statements of qualifications for witnesses to testimony and supplemental budget information (“Attachment B”).

This exhibit also contains deliverables associated with joint PA efforts in which I-REN participated, that relate to items in Exhibit 1 Chapters 3 and 5: D.23-06-055 OP 2 Statewide Assessment and OP 32 Demographic Data Reporting.

IV. THE COMMISSION SHOULD APPROVE I-REN’S PROPOSED PORTFOLIO

I-REN respectfully requests that the Commission authorize I-REN’s portfolio for 2028-2035 as described in this Application and Exhibits. The sections below highlight I-REN portfolio alignment with Commission requirements and guidance.

The I-REN Portfolio Directly Supports the Commission’s Policy Objectives and Local Communities’ Needs

I-REN’s 2028–2035 portfolio is designed to advance Commission and State policy objectives by increasing equitable access to and awareness of EE and resiliency for equity and ESJ communities,¹⁴ and driving growth in demand and supply-side capacity of local EE workforce¹⁵ through education and outreach. The planned outcomes from I-REN’s strategies directly impact affordability locally and statewide by providing TSB, energy savings and bill reductions, peak demand reductions, and greenhouse gas emissions reductions.

The corresponding non-energy benefits and indirect impacts of I-REN’s strategies are equally important and aligned with Commission objectives and guidance. This includes TSB and related energy and GHG savings not claimed through I-REN programs but delivered through referrals to other PAs’ complementary offerings or realized using other non-ratepayer funding sources.¹⁶ Non-energy benefits (NEBs) from I-REN’s portfolio are aligned with the emerging methodologies in development through the Market Rate NEBs Study,¹⁷ e.g., bill savings for public sector customers, economic development and increased jobs through I-REN Energy

¹⁴ D.21-05-031 Findings of Fact 1, 5; CPUC ESJ Action Plan Version 1.0 at 6 footnote 2 “California codified Environmental Justice in GOV § 65040.12: “...the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.”

¹⁵ CPUC ESJ Action Plan Version 2.0 Goal 7; Advancing California’s Workforce for a Clean Energy Future En Banc White Paper, October 2023, at 3, “As California transitions to a clean energy future, it is important to integrate economic and workforce development in energy and climate policies to achieve the state’s goals.”

¹⁶ At the request of Energy Division, I-REN proposes to track TSB channeled from projects supported by its Public Sector Technical Assistance and Strategic Energy Planning Program, as noted in Exhibit 2. While not claimable, those values show the beneficial impact of I-REN’s technical assistance to public sector ratepayers.

¹⁷

Fellows and workforce training pathways, and enhanced community resilience for a region facing increasing extreme heat and frequent, lengthy public safety power shutoff events.¹⁸

Stakeholder engagement and input directly informed I-REN's intentions for its 2028-2035 portfolio, as detailed further in Exhibit 1, Chapter 1 and Chapter 8. I-REN has made decisions about its portfolio to balance the urgent concerns about affordability statewide (which has driven additional scrutiny on EE budgets) with the expressed needs of I-REN communities wanting more support from I-REN across *all* market sectors. In order to find an appropriate balance, I-REN made the deliberate and data-driven decision not to expand its portfolio beyond its existing market sectors and programs, but instead proposes increasing its efforts in key areas of its portfolio based on a year-long process of stakeholder engagement, gap assessment, evaluation, measurement and verification (EM&V) studies.¹⁹ Accordingly, I-REN's intentions for this Application are as follows:

- Optimize I-REN's foundational portfolio of programs based on lessons learned, to meet stakeholders' communicated needs for increased services, and continue strengthening the regional framework being established now over the next eight-year horizon.
- Empower local leaders and organizations through education and outreach to foster greater awareness of EE benefits and opportunities across all sectors in the Inland Empire region.

¹⁸ Exhibit 1 Chapter 2 provides additional detail on service area factors such as these mentioned here.

¹⁹ See Exhibit 1 Chapter 1 Section B: Application Intent, Chapter 3 Strategy #1: Affordability, and Chapter 8 for details on I-REN intent for its application and the data-driven process to inform its proposed portfolio.

I-REN's collaborative approach balances affordability concerns and local needs by relying on existing programs from I-REN and other PAs to ensure ratepayers fully benefit from their investments in these offerings. In parallel, ratepayers across California will receive energy system benefits and growth in the state's clean energy economy, as a result of increasing equitable EE for I-REN communities.

Guided by stakeholder input and these overarching intentions, I-REN proposes to continue strengthening its current portfolio to support progress toward its foundational goals:

- Goal 1. Build capacity and knowledge to enable local governments to effectively leverage EE services and to demonstrate best practices.
- Goal 2. Ensure there is a trained workforce to support and realize EE savings goals across sectors.
- Goal 3. Work closely with local building departments and the building industry to support, train, and enable long-term streamlining of energy code compliance.

These goals guide program inputs and outcomes and are directly aligned with the Commission's portfolio strategies as detailed in Exhibit 1, for example, in Chapter 3 and Chapter 6, and demonstrated visually in the portfolio-wide logic model included in Chapter 5.

I-REN is an Established Portfolio Administrator with Interrelated Programs Tailored for Long-term Regional Capacity-Building

Over the past four years I-REN has established itself as a vital local resource for EE in the Inland Empire. I-REN's role as representatives of local governments naturally lends itself to transparent and collaborative portfolio administration and also has crucial intersections with the ratepayers and market actors served through I-REN's programs.

I-REN is governed through public agency structures and administered by WRCOG, enabling direct integration with local government planning, facilities operations, and capital improvement cycles. This institutional positioning allows I-REN to reduce administrative burden for participating jurisdictions, deliver trusted technical assistance, and create a replicable project pipeline that spans benchmarking and planning through implementation and measurement. Similarly, I-REN’s connections to public sector and private sector building professionals through its local government role and regional workforce partnerships create efficiencies by utilizing existing communication and coordination pathways.

Long-term authorization for 2028–2035 is essential to maintain staffing capacity, retain institutional knowledge, and sustain regional partnerships needed for durable equity advances and market support.

The I-REN Portfolio Complies with REN Criteria and is Coordinated with Other PAs to Ensure Complementarity and Avoid Harmful Duplication

I-REN’s portfolio is structured to comply with applicable REN criteria by demonstrating: (1) clear regional need;²⁰ (2) unique value to the region and statewide EE landscape;²¹ (3) local government-based governance and accountability;²² (4) targeted strategies for hard-to-reach and other equity communities;²³ and (5) coordination mechanisms that reduce harmful duplication, leverage complementary activities, and improve customer navigation.²⁴

I-REN’s strategies emphasize measurable outcomes and transparent reporting, including annual performance tracking and adaptive portfolio management to ensure alignment with Commission

²⁰ See Exhibit 1 Chapters 2 and 8 for details

²¹ See Exhibit 1 Chapter 5 Section A.2 for details

²² See Exhibit 1 Chapter 2 Section A, Chapter 5 Section B, and Chapter 8 for details

²³ See Exhibit 1 Chapter 3 Portfolio Strategies #1, 2, and 11, and Chapter 6 for details

²⁴ See Exhibit 1 Chapter 7

direction throughout the 2028–2035 horizon. See Exhibit 1 Chapter 3 Section A for additional details on I-REN alignment with REN criteria.

The I-REN service territory receives utility service from Southern California Edison (SCE) and Southern California Gas (SoCalGas), and is included in the Southern California Regional Energy Network territory. However, due to the various service territory factors described in Exhibit 1 Chapter 2, I-REN stakeholders report very limited awareness of or participation in EE programs available in the region.²⁵

I-REN has consulted with other PAs in the region on its plans for continuing existing programs in this BPA, in addition to its ongoing coordination as described in Exhibit 1 Chapter 7. This ongoing collaboration will be crucial for I-REN’s overarching goal to expand awareness of EE generally and other PAs’ EE programs in the region. I-REN’s approach of continuing existing programs rather than proposing new offerings is part of an intentional effort to avoid potential risks of harmful duplication and help ensure that this Application is positioned to fill gaps, provide complementary services, and address needs that cannot or are not being addressed by other PAs.

I-REN already engages in active coordination with other PAs as detailed in Exhibit 1 Chapter 7 and refers customers as appropriate to other PA programs (see examples in Exhibit 1 Chapter 3, Strategy 2: Optimize TSB achievement). In this Application I-REN intends to continue and expand its successful coordination to date with other IE region PAs and continue assessing growth in awareness of EE and regional program uptake in its communities.

²⁵ See Exhibit 1 Chapter 8 for this other stakeholder engagement findings that inform I-REN’s Application.

The I-REN Portfolio Is Consistent with the Portfolio Segmentation Direction for RENs and Proposed Sectors align with Commission Guidance on REN Strengths

I-REN's application centers equity in its vision and its approach to the public sector, as well as market support for the workforce, and codes and standards (C&S) support for streamlining energy code compliance. This aligns with Commission guidance in D.21-05-031 which states that RENs are exempted from the limitation placed on non-REN PAs to spend no more than 30 percent of their portfolio budget on market support and/or equity programs:

RENs, by their nature and primary purposes, are more likely to have a greater share of their portfolio devoted to market support and/or equity programs. Therefore, those portions of their budgets will not be subjected to an up-front limitation.²⁶

I-REN's portfolio segmentation follows this guidance in dedicating a greater portion of the I-REN budget to equity and market support programs. Moreover, the interrelatedness of I-REN's programs ensure that equity and market support objectives are not siloed within the programs in those segments, but rather are cross-cutting principles applying to each program within the portfolio.

I-REN examples of cross-sector/cross-segment activities driving portfolio-wide equity and market support outcomes:

- I-REN's market support segment workforce education and training programs directly support equity objectives by providing Energy Fellows to supplement staff capacity at underresourced and underserved local agencies in hard to reach and disadvantaged communities, to help overcome barriers preventing equitable access to EE.

²⁶ D.21-05-031, p. 23.

- I-REN public sector equity segment programs provide technical assistance to drive greater awareness of and demand for EE, thereby contributing to market support objectives.
- I-REN’s C&S programs provide education and technical assistance to bolster the supply side of the market so that both public and private sector building professionals are equipped to deliver high-quality, code-compliant EE installations.
- I-REN tracks participation by disadvantaged workers in workforce and C&S sector programs, and designs its offerings to overcome equity issues in the region, such as language barriers. For example, in 2025 I-REN was proud to be the first REN to offer Spanish-language simulcast C&S trainings and proposes to continue outreach around these offerings to ensure greater awareness among Spanish-speaking building professionals—supporting equity objectives and providing support for supply-side market actors.

The sectors I-REN proposes to serve are the same as I-REN’s existing portfolio: public sector, and cross-cutting C&S and workforce education and training. I-REN’s portfolio is focused on the public sector and local government-aligned market segments where regional coordination are key. This aligns to Commission guidance regarding areas where RENs have special expertise to bring to EE program implementation. For example, the Commission has pointed out the unique ability of local governments to support code compliance as distinct from utilities.²⁷

²⁷ See, for example, D.12-11-015 Finding of Fact (FOF) 13

In the public sector, hands-on technical assistance and consistent engagement with local agencies are necessary to unlock projects that otherwise do not proceed. Similarly, C&S education and technical assistance leverage those local agency connections and I-REN's position as a trusted and accountable partner in local government spaces. For the workforce sector, an important consideration for I-REN in its first business plan and in this Application is the use of partnerships to avoid recreating the wheel and instead identify existing providers and pathways that can be enhanced to increase regional awareness of and training for EE careers.

The I-REN Proposed Budget Is Reasonable, Complies with Commission Guidance on REN Budgets, and Should Be Approved

I-REN's requested 2028–2035 funding supports a balanced portfolio with appropriate administrative, program delivery, and evaluation resources. The process to develop I-REN's zero-based budget was grounded in analysis of program performance and plans to overcome barriers,²⁸ and informed by stakeholder engagement and primary research gathered through I-REN's 2025 EM&V studies.²⁹

The Commission has recognized the harm that funding uncertainty can cause to EE progress in general, and specifically for RENs.³⁰ Multi-year authorization enables stable planning and sustained engagement, which is particularly important for the work that I-REN proposes to continue over the eight-year planning horizon, e.g., public-sector retrofits that require procurement, design, and construction timelines that often extend beyond single-year cycles; establishing workforce pathways and tracking participants from initial interest to training

²⁸ See Exhibit 1 Chapter 4 for details.

²⁹ See Exhibit 1 Chapter 8 for details.

³⁰ See, for example, D.21-05-031 FOF 13 and COL 23, and D.19-12-021 FOF 3.

to employment; and increasing code understanding and compliance through relationship-building with local jurisdictions' planning department staff.

Per CPUC guidance in D.19-12-02, RENs are not required to meet a specific cost-effectiveness threshold as their portfolios are designed to fill gaps and serve HTR customers that require additional support to make headway in the EE market, and therefore their program offerings are likely to be naturally less cost-effective than the larger portfolios of the utilities.³¹ REN budgets may be reasonably assessed in alignment with this guidance, with special consideration for REN plans to serve hard-to-reach customers.³² This context serves as the regulatory basis for I-REN's budget request.

I-REN's budget request reflects a zero-based bottom-up assessment of staffing labor, expenses, implementation needs, and evaluation requirements. While I-REN will maintain the same sectors, segments, and overall program structure, it is looking to expand upon previous program successes and expand program activities. These additional activities and anticipated program growth are reflected in the portfolio budget, which incorporates all projected costs. Budget governance will include transparent oversight, regular reporting, and course correction through adaptive management.³³

I-REN's proposed budget is reasonable because it supports a delivery model grounded in I-REN's strengths, as described earlier in this Application, while enabling the long-term systems needed for durable capacity-building: stable staffing, standardized technical assistance workflows, portfolio performance tracking, and sustained engagement in under-resourced

³¹ D.19-12-021 FOF 10.

³² D.19-12-021 at 39.

³³ See Exhibit 1 Chapter 5 Section B for details.

jurisdictions. The requested 2028–2035 budget authorization provides the certainty necessary to sustain and grow a viable portfolio and deliver consistent, measurable results.

1. I-REN Budget and Savings Forecasts

I-REN requests approval of its 2028-2031 budget and savings forecasts, and it’s 2032-2035 budget forecast shown in the tables that follow.

Table 1: I-REN 4-Year Portfolio Budget Forecast Summary (2028-31) (\$000)

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

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

	2028	2029	2030	2031	Resource Acquisition Segment Only (Total 4-year)	Entire Portfolio (Total 4-year)
Total System Benefit (TSB)	562,987	624,627	682,859	741,429	-	2,611,902.00
Total Resource Cost (TRC) Ratio	0.03	0.03	0.03	0.03	-	0.03
Program Administrator Cost (PAC) Ratio	0.03	0.03	0.03	0.03	-	0.03
Societal Cost Test (SCT) - Base	0.04	0.04	0.04	0.04	-	0.04
Societal Cost Test (SCT) - High	0.04	0.04	0.04	0.04	-	0.04
Ratepayer Impact Measure Test Ratio (RIM)	0.03	0.03	0.03	0.03	-	0.03
Lifecycle MWh/GWh	7,252.63/ 7.25	7,615.26/ 7.62	7,996.02/ 7.996	8,395.82/ 8.396	-	31,259.72/ 31.260
First Year MW	0.50	0.52	0.55	0.58	-	2.14
Lifecycle MMOTHERMS	0.00	0.00	0.00	0.00	-	0.00
Lifecycle Net Electric CO2 Metric Tons	1,555	1,626	1,720	1,815	-	6,717
Lifecycle Net Gas CO2 Metric Tons	56	59	62	65	-	243

Table 3: I-REN 4-year Portfolio Budget Forecast Summary (2032-2035) (\$000)

	2032	2033	2034	2035	Total (4-year)
Total Budget	22,898	23,856	24,762	25,702	97,217
Resource Acquisition Segment Budget	-	-	-	-	-
Market Support Segment Budget	7,878	8,203	8,512	8,834	33,427
Equity Segment Budget	10,264	10,687	11,098	11,525	43,574
Codes and Standards Budget	3,840	4,011	4,161	4,315	16,327
EM&V	916	954	990	1,028	3,889
ED Portfolio Oversight	-	-	-	-	-

The I-REN Portfolio Provides Unique Value and Is Designed to Increase Equity, Market Support, and Codes & Standards Compliance

I-REN provides unique regional value by embedding EE, resiliency, and decarbonization support within local government operations and regional partnerships to advance equity, code compliance, and market support. This value is reflected in I-REN’s strategies and measured by I-REN’s existing and newly proposed unique value metrics, as summarized below and detailed in Exhibit 1 of I-REN’s testimony.

Equity is operationalized through targeted outreach, technical assistance for smaller and under-resourced jurisdictions, and prioritization of facilities and communities that face higher

energy burdens and climate vulnerability.³⁴ I-REN’s testimony provides examples of projects benefitting equity communities. In one such example, Colton Joint Unified School District (CJUSD) partnered with I-REN to complete an interior LED lighting retrofit at Joe Baca Middle School, located in a hard-to-reach and disadvantaged community (see figure below).³⁵

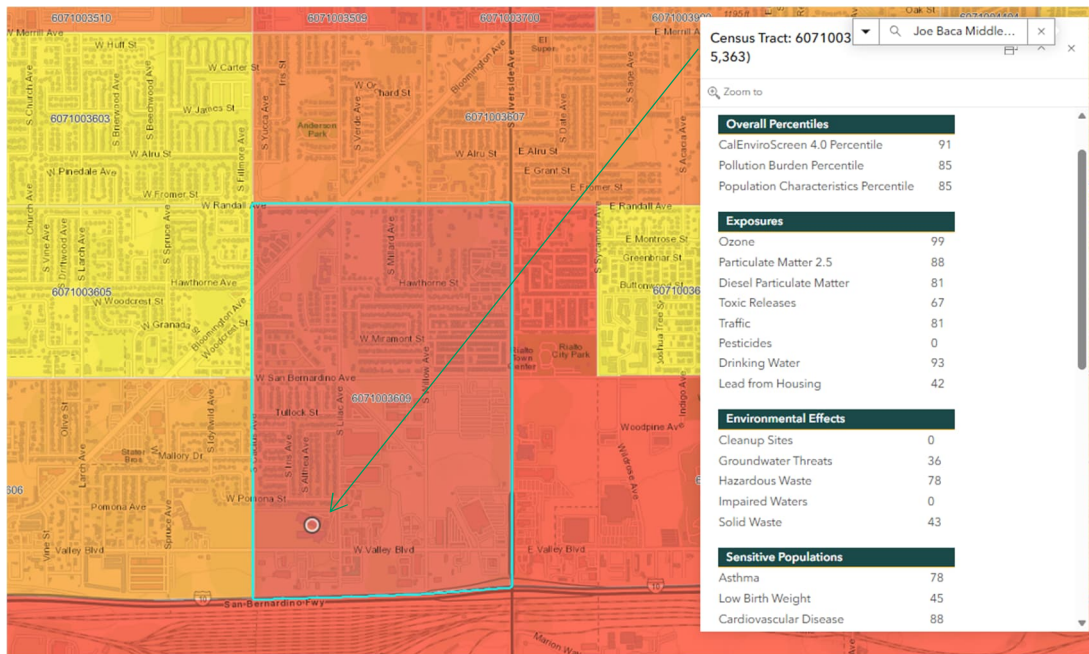
The project resulted in an interior LED lighting retrofit that increased efficiency across 72 classrooms. Through benchmarking support, AB 802 compliance assistance, and project coordination, I-REN helped CJUSD increase equipment efficiency and secure incentives covering roughly 80% of total project costs. This project successfully completed its measurement and verification period in December 2025, and the district is slated to receive the final 60% payout, bringing the total received to \$220,872. The district’s energy liaison noted that “Despite tight budgets, this check is more than enough to fund one teacher in the classroom. Now that’s impact.”

I-REN’s wraparound technical assistance services, which I-REN proposes to increase in 2028-2035 based on stakeholder input, are crucial to enable these projects to be realized. This HTR and DAC project delivered TSB and energy savings, as well as invaluable non-energy benefits that have ripple effects across the whole community, such as an incentive payment that offsets the cost of a teacher’s salary, and a better learning environment for hundreds of students.

³⁴ See, for example, Exhibit 1 Chapter 3 Portfolio Strategies #1, 2, 7, and 11, and Chapter 6 Section B.

³⁵ CalEnviroScreen 4.0 data from California Office of Environmental Health Hazard Assessment, available online at https://experience.arcgis.com/experience/11d2f52282a54cee6184203/page/CalEnviroScreen-4_0

Figure 1: CalEnviroScreen Results for Joe Baca Middle School



I-REN workforce education and training efforts center on local and regional partnerships and leverage I-REN’s local government role to provide tailored solutions that complement other areas of its portfolio. For example, I-REN Energy Fellows are placed in local jurisdictions to boost staff capacity for taking on public sector EE projects and receive code compliance training from I-REN’s C&S educational offerings. These fellowship opportunities directly enable EE and resiliency projects for public sector jurisdictions. Moreover I-REN Energy Fellowships provide hands-on job experience to recent graduates that lead to long-term employment in the region—creating clean energy job opportunities and worker retention in a region characterized by lack of sufficient workforce for EE, as informed directly by I-REN stakeholder feedback and the I-REN Workforce Assessment.³⁶

³⁶ See Chapter 2, Section B Workforce sector market characterization, and Chapter 8 Stakeholder Engagement

Data from I-REN's recent EM&V study of the Fellowship offering showed that the supervisors emphasize that fellows meaningfully increase agency capacity, supporting data management, project implementation, community engagement, and energy-related initiatives. Many supervisors describe fellows as high-performing and well-prepared, reinforcing the program's workforce development role. Career outcomes for fellows are positive, with multiple fellows reporting that they were hired on permanently, extended fellowship terms, or ongoing hiring processes.³⁷

I-REN supports C&S objectives by helping public agency staff and private sector building professionals in the regional workforce understand and comply with evolving requirements, integrating compliance into capital planning, and supporting market readiness through training and coordination. I-REN's C&S training courses will also focus on code requirements surrounding appliance installation, ensuring that contractors stay up to date with compliance, including learning how to properly install new appliances. I-REN recognizes the importance of certifications for building professionals within its region and will develop opportunities for certifications including Energy Code Compliance Rate, Certified Energy Analyst, Certified Building Official (CBO), Plan Examiners, and related International Codes Council (ICC) certifications.³⁸

In 2028-2035 I-REN proposes to build on its innovative efforts to reach Spanish speaking individuals by continuing its live Spanish-simulcast energy code trainings and coordination with the statewide EnergyCodeAce team to develop translated energy code educational materials, and increasing outreach to grow awareness of these resources, which represent an important

³⁷ See, for example, Exhibit 1 Chapter 3 Portfolio Strategies #9 and 11.

³⁸ See, for example, Exhibit 1 Chapter 3 Strategies #9 and 11, and Chapter 6 Sections A and B

intersection of all three I-REN portfolio segments: C&S, market support, and equity. A significant percentage of workers in the IE face language barriers, in particular, Latino workers, with limited English proficiency impacting 20-27% of Latino workforce as shown in Exhibit 1 Chapter 2. Employment opportunities in the IE are dominated by a few key industries including construction. Latino workers are overrepresented among construction workers in the IE, and the construction industry continues to grow as the region’s population rapidly increases. However, Latino workers face persistent wage disparities, housing inequities, and other barriers.³⁹

Latino workers are vital to the construction industry in the IE and therefore crucial for realizing the benefits of EE in this underserved region—at the micro level of high quality EE equipment installations for individual customers, and at the macro level of creating a family- and community-sustaining workforce ecosystem in this growing region that can help meet statewide energy and climate goals. Addressing language barriers in EE training for building professionals is an important equity strategy already in use by I-REN and proposed to continue in this BPA, with cross-cutting sector and segment importance for supporting workforce development to bolster the supply side of EE markets.

The I-REN unique value metrics summarized below are accountability mechanisms intended to measure progress toward I-REN’s overall goals, as described earlier in this Application, achieved through the strategies exemplified above and detailed in I-REN’s testimony. The authorization of I-REN’s proposed portfolio and budget are essential to continuing to advance equitable access to EE, increase energy code understanding and

³⁹ Bonilla et al., *Key Facts and Worker Voices: The Latino Workforce in California’s Inland Empire*, University of California, Los Angeles, Published October 17, 2025. Available online: <https://latino.ucla.edu/research/latino-workforce-inland-empire/>

compliance, and build a sustainable EE workforce in the Inland Empire to realize EE benefits for all ratepayers and communities.

Table 4: I-REN Existing and New Unique Value Metrics Proposed for 2028-2035

Unique Value Metric (UVM) ⁴⁰	Strategic Importance to I-REN Portfolio
Existing UVM: Percentage of partner jurisdictions that use I-REN guides and tools for code compliance	Demonstrates effectiveness of I-REN C&S programs in reaching partner jurisdictions; these relationships are crucial for moving the region toward increased code compliance
Existing UVM: Number of Building Upgrade Concierge (BUC) registrations in partner jurisdictions (total users)	Demonstrates overall usage of I-REN's BUC tool, which supports in expanding technical assistance and identifying opportunities for TSB and energy savings to reduce public sector ratepayers' energy bills
Existing UVM: Number of fellows placed within partner jurisdictions	Energy Fellows are local champions for EE in I-REN territory and support capacity of local agencies to take on EE and resiliency projects, including I-REN NMEC projects delivering TSB and bill savings
New UVM: Percentage of C&S trainings offered in Spanish language	There is a high density of Spanish speakers within I-REN's territory and the local building industry, demonstrating language barrier. I-REN will overcome equity barriers, advance ESJ goals, and reach more participants with Spanish language offerings
New UVM: Count of school participants for WE&T projects; Count of student participants for WE&T projects	Based on I-REN's Workforce Gap Assessment, projections show more than 75% of workers in critical energy-related roles may retire or transfer by 2030, highlighting the need for immediate recruitment and retention strategies—especially given the growth of the IE region. I-REN's solution to this assessment: recruit youth participants to encourage greater awareness and interest in EE jobs

⁴⁰ See Exhibit 1 Chapter 5 Section A for additional details on I-REN unique value metrics.

V. PORTFOLIO PLAN AND PROGRAMS

For 2028–2035, I-REN will deliver an integrated portfolio designed to move public-sector and building professional participants from awareness and education to implementation of high-quality, code-compliant EE, decarbonization, and resiliency projects to increase affordability for local communities. Program design emphasizes measurable and equitable outcomes, and durable market impacts.

Table 5: I-REN Programs Proposed to Continue in 2028-2035

Program ID & Name	Sector	Segment	Brief Description
IREN-PUBL-001: Technical Assistance and Strategic Energy Planning Program	Public	Equity	Program provides no-cost, concierge-style technical assistance to public agencies, including cities, counties, school districts, special districts, and Tribes. Services include utility and facility data collection and benchmarking, development of Energy Resiliency Roadmaps, energy audits, and assistance in navigating funding, financing, and incentive opportunities.
IREN-PUBL-002: Public Buildings NMEC Program	Public	Equity	Cash for Kilowatts is I-REN’s Public Buildings Normalized Metered Energy Consumption (NMEC) Program, which provides performance-based incentives and technical support to public agencies to achieve deep, whole-building energy savings at publicly owned facilities. Using a site-level NMEC approach, the program supports comprehensive whole-building upgrades at critical and community-serving facilities and delivers deep, verifiable savings through meter-based performance.
IREN-WET-001: WE&T Training and Education Program	Cross-Cutting	Market Support	The WE&T Training and Education Program collaborates with education and training providers and workforce organizations to deliver no-cost, regionally relevant EE training. It builds foundational skills and awareness of EE career pathways.
IREN-WET-002: Workforce	Cross-Cutting	Market Support	The WE&T Workforce Development Program provides paid, experiential learning opportunities through I-REN’s Energy

Program ID & Name	Sector	Segment	Brief Description
Development Program			Fellowship initiative by placing Fellows within local public agencies. The WE&T Workforce Development program also support developing the region’s new green workforce by partnering with leading initiatives and outreach within existing collaboratives and organizations that support the knowledge sharing between local government, CBOs, and training providers to enhance the awareness of green jobs within the Inland Empire.
IREN-CS-001: C&S Training and Education Program	Cross-Cutting	Codes and Standards	I-REN’s C&S Training and Education Program fosters working relationships with local building departments and the building industry to support, train, and enable long-term streamlining of energy code compliance. I-REN provides direct training, education, and resources to local building departments and other building professionals responsible for complying with permitting requirements
IREN-CS-002: Technical Support Program	Cross-Cutting	Codes and Standards	I-REN’s C&S Technical Support Program will deliver locally informed resources and tools that streamline code compliance for public and private sector building professionals. Offerings like one-on-one code guidance will remedy challenges faced by Building Department staff, local governments, building professionals, and developers regarding compliance.
IREN-Equity-PortfolioSupport: PORTFOLIO ADMIN-EQUITY	Portfolio Support	Equity	This ‘program’ in CEDARS is a mechanism for separately tracking portfolio administration costs as defined in D.21-05-031 at 32-34.
IREN-MS-PortfolioSupport: PORTFOLIO ADMIN-MARKET SUPPORT	Portfolio Support	Market Support	This ‘program’ in CEDARS is a mechanism for separately tracking portfolio administration costs as defined in D.21-05-031 at 32-34.

Program ID & Name	Sector	Segment	Brief Description
IREN-CS-PortfolioSupport: PORTFOLIO ADMIN-CODES & STANDARDS	Portfolio Support	Codes and Standards	This ‘program’ in CEDARS is a mechanism for separately tracking portfolio administration costs as defined in D.21-05-031 at 32-34.
IREN-IDSM-Equity-001: Equity IDSM	Public	Equity	This ‘program’ in CEDARS is a mechanism for separately tracking IDSM budgets and expenditures; however, for public-facing purposes, I-REN’s IDSM activities are delivered to customers in conjunction with the IREN-PUBL-001: Technical Assistance and Strategic Energy Planning Program.
IREN-EMV-001: IREN EM&V	Cross-cutting	Evaluation Measurement and Verification	This ‘program’ in CEDARS is a mechanism for separately tracking EM&V budgets and expenditures.

VI. REQUEST FOR CONTINUED AUTHORIZATION FOR SOUTHERN CALIFORNIA EDISON AND SOUTHERN CALIFORNIA GAS TO COLLECT AND DISBURSE FUNDS TO I-REN

I-REN requests continued authorization for SCE and SoCalGas to collect and disburse funds to I-REN, in alignment with the Commission’s updated guidance in D.23-06-055.⁴¹

VII. POLICY RECOMMENDATIONS

I-REN proposes the following policy recommendations in Exhibit 1 Chapter 11:

- Examining Challenges with Workforce Standards: I-REN has experienced workforce standards implementation as a barrier to public sector equity project progress, and proposes a collaborative effort to examine these challenges and identify solutions.
- Holistic Approaches for EE and Resiliency: More flexibility regarding use of EE funding is needed to meet the resiliency needs of the equity communities served

⁴¹ D.23-06-055 at 14-16, COL 13.

by I-REN, who are facing increasing climate and grid impacts that threaten communities' health and safety.

- Re-evaluation of Hard-to-Reach Geographic Criteria: The Inland Empire is challenged to receive EE services due in part to its geography and distance from more populous areas yet the region is not considered geographically hard-to-reach, which suggests a need to reexamine this criteria to ensure equity communities are not overlooked.

VIII. COMPLIANCE WITH COMMISSION RULES OF PRACTICE AND PROCEDURE

Relief Sought, Statutory and Other Authority, and Verification – Rule 2.1

I-REN's Application complies with the Commission's Rules of Practice and Procedures, Rules 1.5 through 1.11 and 1.13, which specify the procedures for, among other things, filing documents.

In addition, this request complies with Rules 2.1 of the Commission's Rules of Practice and Procedures. Rule 2.1 requires that all applications: (1) clearly and concisely state authority or relief sought; (2) cite the statutory or other authority under which that relief is sought; and (3) be verified by the applicant. Rule 2.1(a), 2.1(b) and 2.1(c) set forth further requirements that are addressed separately below.

1. Request for Relief – Rule 2.1

The relief being sought is Commission approval of and budget for the administration of I-REN's 2028-2031 Portfolio Plan and 2032-2035 Business Plan. I-REN also seeks approval of the policy recommendations it has summarized here and included in Exhibit 1 Chapter 11.

2. Statutory Authority– Rule 2.1

I-REN files this Application pursuant to Public Utilities Code Sections 451,454, 728, 729, 740.4, and 795, the Commission’s Rule of Practice and Procedure, Commission decisions including but not limited to D.23-06-055, D.21-09-037, D.21-05-031, D.18-05-041, D. 16-08-19, D.18-01-004, D.19-08-009, and orders and resolutions of the Commission.

This Application is filed in accordance with D.21-05-031, OP 5, and D.23-06-055, OP 2, which directed all EE PAs to file EE business plan and portfolio applications every four years by February 15, beginning in 2022.⁴² The Commission granted an extension to all PAs, allowing applications to be filed no later than March 16, 2026.⁴³ As such, this Application is timely filed.

3. Verification– Rule 2.1

As required by Rules 2.1 and 1.11 of the Commission’s Rules of Practice and Procedure, this application has been verified by an officer, Casey Dailey, Western Riverside Council of Governments, lead agency for I-REN.

Legal Name, Location, and State of Organization – Rule 2.1(a)

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

Pursuant to Rule 2.1(a) and 2.1(b) of the Commission’s Rules of Practice and Procedure, the full legal name of the application is the Western Riverside Council of Governments (WRCOG) on behalf of the Inland Regional Energy Network (I-REN). The Western Riverside

⁴² Decision (D.) 21-05-031 OP 5 (May 26, 2021) (directing all energy efficiency portfolio administrators to file energy efficiency business plan and portfolio applications every four years by February 15, beginning in 2022); D.23-06-055, OP 2 (Jul. 3, 2023).

⁴³ Letter from Commission Executive Director Rachel Peterson, Re: Request for Extension of Time to Comply with Decision 21-05-031 OP 5 and OP 2 of D.23-06-055, dated December 15, 2025.

Council of Governments is a California Joint Powers Authority. It is not a corporation organized and existing under the laws of the State of California.

The principal place of business for I-REN is Western Riverside Council of Governments and its post office address and telephone number are: 1955 Chicago Ave., Suite 200, Riverside, CA 92507, Tel: (951) 405-6720.

Correspondence and Communication Regarding This Application - Rule 2.1.(b)

For communications in regard to this Application or to request a copy of this Application, please contact the two individuals listed below:

Casey Dailey
Director of Energy & Environmental Programs
Western Riverside Council of Governments
1955 Chicago Ave., Suite 200
Riverside, CA 92507
Tel: (951) 405-6720
E-mail: cdailey@wrcog.us

Benjamin Druyon
Program Manager
Western Riverside Council of Governments
1955 Chicago Ave., Suite 200
Riverside, CA 92507
Tel: (951) 405-6727
E-mail: bdruyon@wrcog.us

All correspondence and communications regarding this application should be sent electronically to the persons listed above. I-REN understands that notices, orders and other

papers may be served upon the individual named above, and such service shall be deemed to be service upon the I-REN.

Proposed Categorization, Need for Hearing, Issues to Be Considered, Proposed Schedule (Rule 2.1(c))

Rule 2.1(c) requires that applications shall state “[t]he proposed category for the proceeding, the need for hearing, the issues to be considered including relevant safety considerations, and a proposed schedule. (See Article 7.) The proposed schedule shall be consistent with the proposed category, including a deadline for resolving the proceeding within 12 months or less (adjudicatory proceeding) or 18 months or less (ratesetting or quasi-legislative proceeding) or deadline for issuance of a proposed decision within 12 months or less (catastrophic wildfire proceeding).” These requirements are discussed below.

5. Categorization – Rule 2.1(c)

I-REN proposes to characterize this proceeding as “ratesetting” as defined in the Commission’s Rules of Practice and Procedure, Rule 1.3e and Public Utilities Code §1701.1(c)(3). This aligns with the categorization of the previous EE portfolio applications consolidated proceeding (A.22-02-005).

6. Need for Hearing - Rule 2.1(c)

I-REN does not anticipate the need for evidentiary or public hearings. As with the previous EE portfolio applications consolidated proceeding (A.22-02-005), the Commission can receive stakeholder input through protests, responses, and comments. In the event that hearings are necessary, I-REN’s proposed schedule incorporates hearing/workshop dates.

7. Issues to be Considered - Rule 2.1(c)

The principal issues to be considered in this proceeding are: (1) whether I-REN’s Business Plan Application and budget should be adopted as filed, and (2) whether the policy recommendations provided with the Business Plan should be adopted in this proceeding. This Application does not identify any safety considerations associated with the requested relief.

8. Proposed Schedule – Rule 2.1(c)

I-REN proposes the following schedule:

Table 6: I-REN Proposed Schedule for Application

Activity	Proposed Schedule
Application Due Date	March 16, 2026
ALJ Ruling Consolidating 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 Recommendations 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

Activity	Proposed Schedule
Reply Briefs (Matter Submitted)	December 16, 2026
Proposed Decision	February 2027
Final Decision	March 2027

Organization and Qualification to Transact Business– Rule 2.2

The Western Riverside Council of Governments is a California Joint Powers Authority. It is not a corporation organized and existing under the laws of the State of California.

Notice and Service of Application

This is a new application and no service list has been established. I-REN will serve this application on the Chief Administrative Law Judge and the parties to the service by electronic mail to service lists for the current EE proceeding (R.25-04-010) and previous consolidated application proceeding (A.22-02-005), along with Chief Administrative Law Judge Michelle Cooke. The Application components are made available on I-REN’s website at <https://iren.gov/175/Documents-Recordings>.

IX. CONCLUSION

For the reasons described in this Application, WRCOG on behalf of I-REN respectfully requests that the Commission approve I-REN’s 2028–2031 Portfolio Plan and 2032–2035 Business Plan and budget requests and grant the requested relief. Long-term authorization will enable I-REN to continue serving its communities with an EE portfolio that advances Commission policy objectives, improves affordability and equity, supports the local workforce for implementing energy efficiency and code compliance, and delivers measurable energy and grid benefits through 2035.

Respectfully submitted,

/s/ Casey Dailey

By: CASEY DAILEY

Director of Energy & Environmental Programs

Western Riverside Council of Governments

1955 Chicago Ave., Suite 200

Riverside, CA 92507

Telephone: (951) 405-6720

E-mail: cdailey@wrcog.us

Dated: March 16, 2026, in Riverside, California

X. VERIFICATION

I am an authorized employee of the applicant, Western Riverside Council of Governments on behalf of Inland Regional Energy, and pursuant to Rule 1.11 and 2.1 of the Rules of Practice and Procedure of the CPUC, I 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 that are stated on information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 16th day of March, at Riverside, California.

Respectfully submitted,

/s/ Casey Dailey

By: CASEY DAILEY

Director of Energy & Environmental Programs

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Dated: March 16, 2026, in Riverside, California