

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

Application of Association of Bay Area
Governments (CPUC ID 941) for Approval of
the Bay Area Regional Energy Network
2028-2031 Portfolio Plan and 2028-2035
Business Plan.

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

**APPLICATION OF ASSOCIATION OF BAY AREA GOVERNMENTS (CPUC ID 941)
FOR APPROVAL OF THE BAY AREA REGIONAL ENERGY NETWORK
2028-2031 PORTFOLIO PLAN AND 2028-2035 BUSINESS PLAN**

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In accordance with Decisions (D.) 21-05-031 and 23-06-055, the Association of Bay Area Governments, on behalf of the Bay Area Regional Energy Network (BayREN), files this Application with the California Public Utilities Commission (Commission).¹ On December 15, 2025, the Commission granted an extension to BayREN and all other portfolio administrators (PAs), allowing applications to be filed no later than March 16, 2026.² As such, this Application is timely filed.

I. ABOUT BAYREN

BayREN is a coalition of the Association of Bay Area Governments (ABAG) and the nine counties of the Bay Area (Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa

¹ California Public Utilities Commission, Decision (D.) 21-05-031, *Assessment of Energy Efficiency Potential and Goals and Modification of Portfolio Approval and Oversight Process* (May 26, 2021), Ordering Paragraph (OP) 5, and California Public Utilities Commission, D.23-06-055, *Decision Authorizing Energy Efficiency Portfolios for 2024–2027 and Business Plans for 2024–2031*, OP 2 (June 29, 2023), directed all energy efficiency portfolio administrators (PAs) to file energy efficiency (EE) business plan and portfolio applications every four years by February 15, beginning in 2022.

² Rachel Peterson (Executive Director, California Public Utilities Commission), letter regarding “Request for Extension of Time to Comply with Decision 21-05-031 Ordering Paragraph 5 and Ordering Paragraph 2 of D.23-06-055” (December 15, 2025).

Clara, Solano, and Sonoma). First approved by the Commission as a PA in 2012³ and created in 2013 through a Memorandum of Understanding (MOU) signed by each county member, BayREN administers regional, equity-focused programs within the resource acquisition, market support and equity segments as well as a codes and standards (C&S) program and one statewide program.

ABAG serves as the administrator for BayREN, and all members participate in both its overall governance and each BayREN program. This structure means that Bay Area local governments directly manage BayREN, ensuring that its programs and activities evolve as needed to address key local needs.

II. OVERVIEW OF THE BAYREN APPLICATION AND TESTIMONY

A. BayREN Business Plan Overview

In this Application, BayREN requests \$186,596,276 for regional programs during the four-year portfolio period—and \$393,172,734 for the full eight-year strategic plan period—to continue to operate nine existing, successful programs and launch one new program. Each of these programs fill gaps in energy efficiency services, pilot innovative programs, and serve hard-to-reach customers. These ten programs span four customer sectors: Residential, Commercial, Public, and Cross-cutting. Over the course of the four-year portfolio period, approximately two-thirds of BayREN’s regional portfolio budget is dedicated to the Equity segment (66%); the remainder of BayREN’s proposed budget is dedicated to: Market Support (12%), Resource Acquisition (14%), Codes and Standards (4%) and Evaluation, Measurement, and Verification (EM&V) (4%).

³ See generally, California Public Utilities Commission, D.12-11-015, *Decision Approving 2013-2014 Energy Efficiency Programs and Budgets* (November 8, 2012).

BayREN also requests \$23,267,129 for its statewide Home Energy Score (HES) California program for the four-year portfolio period, and \$54,377,858 for the full eight-year strategic plan period. The HES California program was approved in D.23-06-055 as a new statewide market support program in the residential sector and is the first statewide program to be administered by a non-investor-owned utility (IOU) PA. The program expands on years of successful implementation through the BayREN Green Labeling program, which received national recognition, including winning two Department of Energy Innovation Awards.^{4,5}

III. THE BAYREN PORTFOLIO WITHIN THE COMMISSION’S ENERGY EFFICIENCY FRAMEWORK

The BayREN portfolio presented in this Application is guided by State, Commission, and local policy objectives, as well as Commission precedent regarding RENs.

A. The BayREN Portfolio Directly Supports the Commission’s—and the Local Community’s—Policy Objectives.

In its Application, BayREN proposes programs and strategies that are designed to support the equitable achievement of California’s climate and energy goals. At its foundation, the Plan is guided by the California goals of doubling energy efficiency in existing buildings by 2030,⁶

⁴ U.S. Department of Energy, “Better Buildings Innovation Award,” awarded to BayREN (April 21, 2020), for successfully building and expanding a voluntary Home Energy Score market in the nine-county San Francisco Bay Area.

⁵ Better Buildings Solution Center, “Bay Area Tackles Climate Goals through Innovative Home Energy Score Program,” Beat Blog, June 22, 2021, <https://betterbuildingssolutioncenter.energy.gov/beat-blog/bay-area-tackles-climate-goals-through-innovative-home-energy-score-program>.

⁶ Clean Energy and Pollution Reduction Act of 2015, Senate Bill 350, 2015–2016 Reg. Sess., *Statutes of California 2015*, chap. 547. SB 350 established new energy efficiency and renewable energy targets to support California’s goal of reducing greenhouse gas emissions 40% below 1990 levels by 2030.

reducing emissions from existing buildings at least 40 percent below 1990 levels by 2030,⁷ achieving 100 percent renewable and zero-carbon retail electricity,⁸ and becoming entirely carbon neutral by 2045.⁹ The Plan is also guided by the state’s focus on identifying and addressing barriers to advancing energy efficiency and decarbonization in low-income and disadvantaged communities,¹⁰ as well as the Commission’s Environmental and Social Justice Action Plan (ESJ Action Plan).¹¹

BayREN’s portfolio is guided by a set of five overarching goals that encompass these state goals and incorporate Commission-identified strategies and priorities, as discussed in Exhibit 1: Testimony in Support of the Bay Area Regional Energy Network’s 2028-2031 Portfolio Plan and 2028-2035 Business Plan, Chapter 3. BayREN’s goals are:

Goal 1: Prioritize those who are hard-to-reach, have been generally underserved by ratepayer-funded programs, or that face persistent barriers that limit their participation in energy efficiency and electrification programs.

⁷ Building Decarbonization Assessment, Assembly Bill 3232, 2017–2018 Reg. Sess. (Cal. 2018). This act requires the California Energy Commission to prepare an assessment, in consultation with the California Public Utilities Commission, the California Air Resources Board, and the California Independent System Operator, to evaluate reducing building greenhouse gas emissions by 40 percent below 1990 levels by 2030.

⁸ The 100% Clean Energy Act of 2018, Senate Bill 100, 2017–2018 Reg. Sess., *Statutes of California 2018*, chap. 312. SB 100 established a landmark policy requiring renewable and zero-carbon resources to supply 100 percent of electric retail sales to end-use customers by 2045.

⁹ California, Governor (Jerry Brown), Executive Order B-55-18 (September 10, 2018). This order requires carbon neutrality statewide by no later than 2045.

¹⁰ *See., e.g.,* Clean Energy and Pollution Reduction Act of 2015; Small Business COVID-19 Relief Financial Assistance Program - California Jobs and Economic Recovery Fund, 2019–2020 Reg. Sess., *Statutes of California 2020*, chap. 41.

¹¹ California Public Utilities Commission, *Environmental & Social Justice Action Plan Version 2.0* (April 7, 2022), <https://www.cpuc.ca.gov/news-and-updates/newsroom/environmental-and-social-justice-action-plan>.

Goal 2: Increase energy efficiency of buildings and reduce energy use, particularly at peak times, by encouraging the development of energy-efficient and decarbonized buildings.

Goal 3: Improve health and resilience outcomes for residents and communities.

Goal 4: Reduce greenhouse gas emissions, focusing on building decarbonization.

Goal 5: Fill gaps and spur innovation in order to respond to changing conditions and find better, more effective approaches to meet local needs.

These goals, and BayREN's portfolio, are also based on significant engagement with community-based organizations (CBOs), program implementers, program participants, local governments, and regional and state agencies, as described in Exhibit 1, Chapter 8. Feedback from these stakeholders provided essential guidance on refining BayREN's strategic focus areas, ensuring programs and services meet the needs of underserved and hard-to-reach communities, and enhancing coordination across existing regional initiatives.

These goals are also aligned with Bay Area local government goals, particularly relating to reducing greenhouse gas emissions and improving health and resilience outcomes for communities. Indeed, ninety Bay Area jurisdictions have adopted climate goals in addition to the state's goals, and many of those have Climate Action Plans or building electrification roadmaps they are actively working to implement. Extensive stakeholder engagement, as described in Exhibit 1, Chapter 8, also revealed a related strong interest in health and resilience outcomes.

BayREN's achievement of these goals is driven largely by utilizing the strength, experience, and knowledge of local governments. To do this, BayREN taps into related local government activities and partnerships to create solutions that are holistic, based on local needs, and consistent throughout the region. To further the portfolio goals and the Commission's

strategies, BayREN directly coordinates with and leverages other local government activities. Due to BayREN's efforts, local governments are able to access additional funding sources to contribute towards the achievement of these goals.

At the same time, BayREN has been focused on affordability and ratepayer value. On October 30, 2024, Governor Newsom issued Executive Order N-05-24 (Executive Order). Specifically, the Executive Order requested that the Commission:

- “[E]xamine the benefits and costs to electric ratepayers of programs it oversees and rules and orders it has promulgated pursuant to statutory mandates that may be unduly adding to electric rates, or whose funding might more appropriately come from a source other than ratepayers”;
- “[Report] its recommendations for modifying or repealing any statute that would reduce costs to electric ratepayers without compromising public health and safety, electric grid reliability, or the achievement of the States 2045 clean electricity goal and the States 2045 economywide carbon neutrality goal”; and
- “[M]odify or sunset any underperforming or underutilized programs or orders whose costs exceed the value and benefits to electric ratepayers. The commission is requested to return any unused funds collected from ratepayers for underperforming programs and utility investments in the form of a bill credit, if it identifies such funds.”¹²

In its response to the Executive Order, the Commission highlighted the major clean energy achievements that have been funded by ratepayers and the significant contribution of these achievements towards state climate and energy goals. The Commission simultaneously acknowledged three opportunities to control costs and reduce electricity bills: “first, identifying opportunities to control the growth in utility spending. Second, identifying any opportunities for cost sharing. Third, implementing equitable rates to recover approved costs for wildfire mitigation,

¹² California, Governor (Gavin Newsom), Executive Order N-05-24, OPs 2-3 (October 30, 2024).

public purpose programs, and the fixed costs of the grid.”¹³ The Commission also noted the need to “constantly evaluate whether the programs are succeeding on their own terms and whether their benefits outweigh their costs.”¹⁴

Consistent with the Commission’s recommendations, BayREN reviews the performance of its programs on an ongoing basis using data collected by its programs and regular EM&V studies. As a result, BayREN closed one program in 2025,¹⁵ fully redesigned its single family residential program in 2024-2025, and implemented significant changes to both the multifamily and commercial programs to better meet their goals. BayREN has reviewed and analyzed the nine continuing programs included in this Application to ensure that they are making adequate progress towards their goals and delivering benefits to ratepayers.

Finally, BayREN’s new program proposal, the Incubator for Community-Designed Initiatives, directly advances the goals of the Commission’s ESJ Action Plan and elevates local community voices. This program is based on the Community-Designed Collaborative framework requested by the Commission in D.23-06-055¹⁶ and as developed by SoCalREN. This new program, described in Exhibit 1, Chapter 3 and in Exhibit 2: Program Cards, will allow interested community-based organizations as well as local government agencies such as health departments to learn about energy efficiency programs and program design and to develop proposals for demonstration activities that could potentially be funded and implemented. The final design of the

¹³ California Public Utilities Commission, *CPUC Response to Executive Order N-5-24*, February 18, 2025, 4, <https://www.cpuc.ca.gov/-/media/cpuc-website/industries-and-topics/reports/cpuc-response-to-executive-order-n-5-24.pdf>.

¹⁴ Commission Response to Executive Order N-5-24 at 5.

¹⁵ Bay Area Regional Energy Network, *Bay Area Regional Energy Network's Closure of the Water Upgrades Save Program*, Advice Letter 32-E (California Public Utilities Commission, October 7, 2025).

¹⁶ D.23-06-055 at 30-31.

program will be shaped with ideas and input from potential program participants to ensure that it will meet relevant local needs and is consistent with Commission guidance.

B. BayREN Is an Established Portfolio Administrator.

BayREN has been a portfolio administrator and has successfully implemented energy efficiency programs since 2013. By the end of 2024, BayREN achieved:

- Over 166 million tons of carbon avoided;
- \$88 million paid in incentives;
- 76,000 housing units and businesses upgraded; and
- 13,500 attendees participated in 600 technical trainings.

The BayREN portfolio proposed in this Application builds upon these successes while also responding to changing state and commission policy, especially in regards to decarbonization, affordability and equity.

C. The BayREN Portfolio Complies with the REN Criteria.

A key element that differentiates RENs as portfolio administrators compared to IOU or community choice aggregator (CCA) portfolio administrators is that RENs are constrained in which programs they are allowed to offer. This limited role has been applied since RENs were first authorized.¹⁷ In D.19-12-021, the Commission confirmed and revised the limited role of RENs and the criteria that the Commission would use to evaluate REN proposals:

[RENs must show] new or unique value to the Commissions energy, climate, and/or equity goals, specifically:

- Activities that utilities or CCA program administrators cannot or do not intend to undertake.

¹⁷ D.12-11-015 at 17.

- Pilot activities where there is no current utility or CCA program offering, and where there is potential for scalability to a broader geographic reach, if successful.
- Activities serving hard-to-reach markets, whether or not there is another utility or CCA program that may overlap.¹⁸

This limited role, however, is not an unimportant role. The Commission has consistently acknowledged the importance of RENs’ role within the energy efficiency landscape. In D.19-12-021, the Commission “agree[d]... that the importance of RENs may increase as budgets and roles for LGPs are shrinking within the utility portfolios for multiple reasons... The particular areas of unique capacities local governments may bring in the delivery of energy efficiency include, but may not be limited to, public sector buildings, issues surrounding building code compliance, and treating or delivering energy efficiency services to hard-to-reach customers.”¹⁹

This role is critical today as energy unaffordability hits vulnerable households, businesses, and communities the hardest. Approximately 66% of BayREN’s total regional portfolio budget is dedicated to Equity segment programs in the residential, commercial, and cross-cutting sectors. BayREN’s portfolio is also designed to fill gaps and spur innovation by responding quickly to changing conditions and new insights, testing solutions as appropriate, and identifying and implementing improvements at all levels, from program design to individual activities. Each of BayREN’s programs is based on one or more of the REN criteria, as noted in Exhibit 1, Chapter 3 and Exhibit 2.

¹⁸ California Public Utilities Commission, D.19-12-021, *Decision Regarding Frameworks for Energy Efficiency Regional Energy Networks and Market Transformation*, 32 (December 6, 2019). Where there is overlap of programs, the Commission has advised a REN to “target[] the hardest-to-reach customers for activities that overlap or are significantly similar to [the IOUs].” California Public Utilities Commission, D.19-05-041, *Decision Addressing Energy Efficiency Business Plans*, 100 (May 31, 2018).

¹⁹ D.19-12-021 at 18.

D. The BayREN Portfolio Is Consistent with the Portfolio Segmentation Direction for RENs.

Decision 21-05-031 directed “program administrators to further segment their portfolios based on the primary program purpose, into the following three segments defined as follows:

Resource Acquisition: Programs with a primary purpose of, and a short-term ability to, deliver cost-effective avoided cost benefits to the electricity and natural gas systems. Short-term is defined as during the approved budget period for the portfolio, which will be discussed further later in this decision. This segment should make up the bulk of savings to achieve TSB goals.

Market Support: 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.

Equity: Programs with a primary purpose of providing energy efficiency to hard-to-reach or underserved customers and disadvantaged communities in advancement of the Commissions 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.²⁰

Decision 23-06-055 identified “a fourth distinct segment,” **Codes and Standards** (C&S), which has the primary purposes of:

- Influencing standards and code-setting bodies (such as the California Energy Commission (CEC)) to strengthen energy efficiency regulations;
- Improving compliance with existing codes and standards;
- Assisting local governments to develop ordinances that exceed statewide minimum requirements; and
- Coordinating with the other programs and entities to support the state’s policy goals.²¹

²⁰ D.21-05-031 at 14-15.

²¹ D.23-06-055 at 13.

While IOUs and CCAs are limited in their ability to serve Market Support and Equity programs due to budget caps, RENs are exempt from this constraint. As noted by the Commission, “[t]he budget amount devoted to the market support and equity programs will be limited to 30% of the total budgets, except in the case of the regional energy network program administrators, who will not be subject to these limits because of the different nature of their portfolios.”²² Specifically, “[t]he RENs are exempted from this requirement because of the nature of their portfolios, which is already different from the other program administrators. 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.”²³

BayREN’s proposed regional portfolio includes four programs in the Equity segment. These programs receive 66% of the regional portfolio program budget and serve the residential and commercial sectors, as well as the cross-cutting workforce education and training program. The BayREN Business Program is the sole Resource Acquisition and pay-for-performance offering within the BayREN portfolio. With 14% of the regional program budget, its primary mission is to deliver cost-effective, verifiable energy savings while also advancing equity objectives across the region. The Codes and Standards Program has 4% of the budget, focuses on Bay Area local governments, and supports all four of the purposes defined by the Commission for programs in this segment. Those include influencing standards, improving compliance, assisting local governments to develop ordinances that exceed statewide minimum requirements, and coordinating with other programs and entities. The 12% of the regional program budget is devoted

²² D.21-05-031 at 2 (emphasis added).

²³ *Id.* at 23.

to four Market Support programs in the public, residential and cross-cutting sectors, and the remaining 4% is allocated to EM&V. In addition, BayREN’s portfolio includes one statewide residential Market Support program, Home Energy Score California.

E. The BayREN Portfolio Provides Unique Value.

Due to RENs’ unique and limited role as PAs, the Commission has not imposed the same minimum cost-effectiveness threshold on RENs as it has imposed on IOU and CCA portfolio administrators. As the Commission found in D.18-05-041:

[W]e do not find it reasonable to impose a minimum cost-effectiveness threshold for REN proposals. As we have maintained in the past, the more limited scope of activities we authorize RENs to undertake, which results in a much lower ability to diversify their portfolios (relative to the IOUs), argues against holding them to a particular cost-effectiveness standard.²⁴

The Commission reiterated this position in D.19-12-021:

We approved the existing REN portfolios recently, in D.18-05-041, and at that time reaffirmed that we do not wish to set a specific cost-effectiveness threshold for RENs. This is both because the size of the REN portfolios is smaller, and because the RENs are inherently designed to take on filling gaps in the other larger portfolios or serving the needs of hard-to-reach customer segments/markets that will be naturally less cost-effective to serve. None of this reasoning has changed, and therefore, we continue to decline to set a cost-effectiveness threshold for new or existing RENs now.”²⁵

This was further re-affirmed in D.21-05-031 with regards to Resource Acquisition programs, “requir[ing] that all program administrators with energy efficiency resource acquisition programs, excluding RENs whose portfolios have different rules, to show that the resource acquisition segment of their portfolio, with all resource acquisition programs costs and benefits combined together, is cost-effective on an *ex ante* basis, with a TRC ratio of at least 1.0 or

²⁴ D.18-05-041 at 95.

²⁵ D.19-12-021 at 37.

greater.”²⁶ With regard to Market Support and Equity programs, the PAs have developed metrics and indicators to assess portfolio performance, which were first adopted in D.23-06-055 and subsequently revised in Resolution E-5351.²⁷

The Commission has historically evaluated REN programs based on the ability to provide value, meet designated targets, and track, and hopefully improve upon, their cost-effectiveness.²⁸ The Commission has further “encourage[d] RENs to manage their programs with an eye toward long-term cost-effectiveness, just as we encourage the other program administrators to do.”²⁹

BayREN’s Business Plan covers a portfolio of programs that focus on equity and supporting the market while also capturing energy savings. BayREN’s goal is not only energy and GHG savings, but also to ensure that its regional programs reach as deeply into the underserved populations as possible within the given budgets and provide foundational educational opportunities for those in the market. BayREN continues to measure the success of the portfolio by tracking a suite of program-level BayREN Unique Value Metrics that address Equity and Market Support programs, as well as Resource Acquisition and cost-effectiveness. For example, program-level Unique Value Metrics for Market Support segment programs include the number of people trained or number of jurisdictions assisted, while Equity segment programs track the

²⁶ D.21-05-031 at 22 (emphasis added).

²⁷ D.23-06-055 at 59 *et seq*; California Public Utilities Commission Resolution E-5351 (June 17, 2025).

²⁸ D.18-05-041 at 95 (“To be clear, we remain interested in seeing RENs provide value (or the promise of value), and this serves as a key criterion against which we evaluate their proposals and will assess their performance going forward, particularly in tracking business plan metrics and assessing PAs progress in meeting their designated targets. We decline to consider the proposed Benefits Evaluation Framework, as we prefer to use the same cost-effectiveness methodology for all PAs even if we do not hold the RENs to a particular standard. We also remain interested in seeing improving TRC estimates over the long run, therefore we retain our requirement for RENs to include cost-effectiveness statements in their ABALs”).

²⁹ D.19-12-021 at 37.

number and percentage of residential units served within the equity target populations and number of non-energy benefits reported.

BayREN is also working to improve how it measures and reports on the performance of the portfolio and programs in several ways:

- In this Application, BayREN has developed and is proposing a new set of portfolio-level Unique Value Metrics that can be used to track performance at the portfolio level.
- BayREN will be refining how it measures overall progress and performance, starting by reviewing all program and portfolio outputs to ensure that all types of outputs are being identified and as many as possible are monetized and quantified.
- BayREN has participated in the Equity and Market Support Metric Working Groups at CAEECC and will continue to be involved in the development of the related goal constructs.

Finally, BayREN notes that the Commission's evaluation of ratepayer value in this proceeding will be hindered by existing methodologies and approaches which do not reflect the full value of energy efficiency, including, among others, the value of: to-code savings and the full

value of energy and cost savings,³⁰ addressing code and installation compliance rates,³¹ reliability,³² and other benefits not captured by current methodologies.

IV. PORTFOLIO PLAN, PROGRAMS AND BUDGET

In order to implement its eight-year vision, BayREN has developed a four-year portfolio plan (Portfolio Plan). The Portfolio Plan proposes 10 regional programs, of which nine are existing and one is new, as well as one statewide program. Brief descriptions of each program are provided below.

A. Regional Portfolio Programs

1. Bay Area Multifamily Building Enhancements Program (BAMBE) – BAYREN02

The BAMBE program prioritizes properties in census tracts burdened by extreme heat, poor air quality, and high housing costs, and focuses on smaller buildings (under 50 units) as well as those owned by independent, co-op, non-profit, or community land trust organizations. BAMBE

³⁰ See Bay Area Regional Energy Network and Central Coast Regional Energy Network, “Comments of Association of Bay Area Governments and County of Ventura on Administrative Law Judge’s Ruling,” Rulemaking 22-11-013 (May 12, 2025), <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M565/K498/565498816.PDF> and “Reply Comments of Association of Bay Area Governments and County of Ventura on Administrative Law Judge’s Ruling,” Rulemaking 22-11-013 (May 19, 2025), <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M566/K884/566884660.PDF>.

³¹ See Steven Moss, “Direct Testimony of Steven Moss on Behalf of Bay Area Regional Energy Network and Tri-County Regional Energy Network,” California Public Utilities Commission, Application 25-04-014 (January 15, 2026), <https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2504014/8859/595201065.pdf>; California Energy Commission, “Notice of Availability on California Energy Code Compliance Gap Analysis Staff Report,” Docket 24-BSTD-05, July 29, 2025, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=265070>.

³² See Bay Area Regional Energy Network and Central Coast Regional Energy Network, “Reply of Association of Bay Area Governments and County of Ventura on Order Instituting Rulemaking,” Rulemaking 24-05-023 (July 8, 2024), <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M536/K637/536637806.PDF>.

delivers no-cost technical assistance and rebates based on project scope and property location.³³ Measures include energy efficiency and electrification upgrades that reduce energy costs, lower greenhouse gas emissions, and improve resident health, safety, and comfort. Since the program launched, BAMBE has served approximately 50,000 units across 700 projects—about 6% of the Bay Area’s multifamily stock.

2. *Efficiency and Sustainable Energy Home Program (EASE Home) – BAYREN08*

EASE Home is a direct install program that provides qualifying single-family homes with certain energy efficiency measures including whole-home air sealing, insulation and duct sealing, repair, or replacement. The program requires prevailing wages and incentivizes high-road workforce practices, ensuring that the transition to clean energy supports good jobs and economic opportunity.

3. *Health, Energy, and Resiliency Education (HERE) – BAYREN07*

Formerly known as the Green Labeling program, HERE is a market support program that takes an innovative approach to advancing energy efficiency and electrification by engaging and educating critical but often overlooked stakeholders and providing them with specialized training. BayREN plans to expand the program to incorporate additional overlooked stakeholders that influence home renovation and technology decisions in existing homes, such as interior designers, architectural designers and architects, in order to further drive market demand for electrification and efficiency.

³³ Small multifamily properties in census tracts experiencing disproportionate heat, air quality and housing cost burdens may be eligible for higher incentives if they install measures that aim to alleviate those burdens.

4. BayREN Works – BAYREN09

BayREN Works is an expansion of BayREN’s existing workforce, education and training program and includes two components: Youth Employment and Contractor Mentorship. Youth Employment provides low-income youth with paid career experience in energy efficiency jobs and other energy-related opportunities, increasing their employability while also building the energy workforce. The new Contractor Mentorship Program will focus on small, local, minority and women contractors and will provide training and pair them with mentors to observe in-field installation of electrification technologies such as heat pumps.

5. Codes & Standards – BAYREN03

BayREN’s Codes and Standards program seeks to assist local governments with energy policies and energy code compliance by providing support for Bay Area local governments to increase energy performance of buildings by improving energy code compliance and increasing adoption of local energy policies. The program also serves as a bridge between local governments and the California Energy Commission to ensure that the voice of local governments is heard when state policies such as the Building Energy Efficiency Standards are developed.

6. Incubator for Community-Designed Initiatives – BAYREN13

The Incubator for Community-Designed Initiatives is a proposed new market support program that seeks to offer community-based organizations and local government agencies opportunities to design, propose, and potentially implement energy efficiency activities in the BayREN region.³⁴ This program is modeled after SoCalREN’s Community-Based Design

³⁴ D.23-06-055 at 81 (stating the Commission’s desire to have Community-Based Design Collaboratives and the expectation that RENs, by their nature of being locally-focused, will make progress on this concept). This program is consistent with the Commission’s desire.

Collaborative.³⁵ The program will test activities, with results reported annually and the potential for successful initiatives to be expanded throughout the region and beyond.

7. *BayREN Business – BAYREN06*

The BayREN Business Program helps small and medium businesses (SMB) located in disadvantaged (DAC) and low-income communities (LIC) or are defined as hard-to-reach (HTR) lower energy use and utility costs through energy efficiency upgrades, focusing on those historically underserved by traditional programs. As one of the first small business programs in the U.S. to implement a pay-for-performance model for SMBs, it ensures incentives are tied to verified energy savings, protecting ratepayer funds and driving measurable results. This data-driven, measure-agnostic approach allows contractors to tailor solutions to diverse business needs, from lighting upgrades to behavioral strategies.

8. *BayREN Refrigerant Replacement Program (BRRR) – BAYREN10*

The BayREN Refrigerant Replacement Program (BRRR) provides direct-install services to tackle one of the most pressing challenges for food and floral small and medium businesses (SMB): unregulated,³⁶ outdated refrigeration systems that leak harmful refrigerants, waste energy, and increase costs. Services provided include essential system repairs, leak fixes, environmentally friendlier refrigerant replacements, and energy efficiency upgrades. To ensure lasting benefits, participants receive maintenance training covering ongoing system care.

³⁵ “Collaborative | SoCalREN,” accessed February 25, 2026, <https://socalren.org/about/collaborative>.

³⁶ Commercial refrigeration systems with a refrigerant charge of 50 pounds or more fall under CARB regulations. Most small and medium-sized food and floral businesses use systems with far smaller charges, so they are outside these regulatory requirements.

9. Integrated Energy Services Program (IES) – BAYREN11

BayREN’s Integrated Energy Services (IES) program offers two core services to assist with improving the energy performance of local public sector buildings: 1) Energy Concierge, a single point of contact that connects local governments and special districts to the most relevant current energy program offerings, and 2) Energy Roadmapping, which delivers customized engineering assistance and actionable plans for energy-related facility improvements. The program helps overcome barriers to upgrading public facilities and community resilience centers (CRCs), enabling them to develop and carry out building energy improvements while leveraging a variety of funding sources including local funds, grant funds, and incentive funds.

10. Targeted Decarbonization Services Program (TDS) – BAYREN12

BayREN’s Targeted Decarbonization Services (TDS) program provides hands-on technical assistance, gap funding, and training to move projects from concept to completion, along with detailed case studies through three core services—Decarbonization Showcases, Decarbonization Education, and Decarbonization Financing. Showcase projects demonstrate real-world decarbonization strategies in municipal facilities, supported by expert engineering technical assistance. Completed projects are documented through in-depth case studies to create replicable models that other jurisdictions can follow. TDS also offers training to local government finance staff on options for paying for decarbonization technologies, as well as training for facilities management staff on ongoing operations and maintenance. The program has also been documenting needs and gaps related to financing of decarbonization equipment, and will test initiatives to address these needs, which could include leveraging non-ratepayer funds and providing bridge loans.

B. Statewide Program

***1. Statewide Home Energy Score California (HES California) –
BAY_SW_HESC***

The Commission authorized the creation of BayREN’s statewide HES California program in D.23-06-055,³⁷ and subsequently approved the program as proposed in Advice Letter 28-E. HES California launched in January 2026 and expands BayREN’s successful work within the region throughout the state. The program incentivizes delivery of home energy reports that include the U.S. Department of Energy’s Home Energy Score and accompanying information. These reports inform single-family households about their homes’ energy use, how their homes’ energy performance can be improved, and the next steps they can take to make home energy upgrades. Additionally, HES California recruits and trains HES assessors.

³⁷ D. 23-06-055 at 120, OP 3.

BayREN Program	Market Sector	REN Activity			Existing or New	Four Year Budget 2028-2031	Eight Year Budget 2024-2035
		Gap Filling	Pilot	HTR			
Resource Acquisition							
BayREN Business	Commercial	✓		✓	Existing	\$24,148,445	\$52,111,445
Market Support							
Integrated Energy Services	Public	✓			Existing	\$5,197,271	\$11,042,671
Targeted Decarbonization Services	Public	✓			Existing	\$6,636,505	\$13,958,005
Health, Energy and Resilience Education	Residential	✓			Existing	\$4,336,338	\$9,115,038
Incubator for Community-Designed Initiatives	Cross-cutting	✓	✓		New	\$5,822,698	\$12,579,398
Home Energy Score California (Statewide)	Residential	✓			Existing	\$22,336,444	\$52,202,744
Equity							
EASE Home	Residential	✓		✓	Existing	\$44,763,051	\$92,093,451
Bay Area Multifamily Building Enhancements (BAMBE)	Residential	✓	✓	✓	Existing	\$37,748,069	\$78,382,269
BayREN Refrigerant Replacement (BRRR)	Commercial	✓		✓	Existing	\$20,133,305	\$43,976,005
BayREN Works	Cross-cutting	✓		✓	Existing	\$14,161,082	\$30,039,682
Codes and Standards							
Codes and Standards	Cross-cutting	✓	✓		Existing	\$6,842,443	\$14,428,043
Totals: 10 Regional Programs 1 Statewide Program	4 Market Sectors				10 Exist; 1 New	\$201,468,869	\$429,648,569

C. The BayREN Proposed Budget Is Reasonable and Should Be Approved.

BayREN’s proposed budget is reasonably and appropriately sized to support the state’s goals for energy efficiency, greenhouse gas reductions, and equity within the Bay Area region. The Commission has provided guidance to RENs regarding the criteria for determining the overall reasonableness of REN budgets. As described in D.19-12-021, “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, while taking into account plans to serve hard-to-reach customers.”³⁸ BayREN has evaluated the budget for each program proposed to ensure it is proportional to the regional need, taking into account plans to serve hard-to-reach customers.

The distribution of budget between portfolio sectors and segments reflects BayREN’s continued focus on the Equity segment, and the proposed portfolio also includes an increased emphasis on responding in a timely way to quickly evolving local needs and state policy trends and goals regarding building electrification and climate resilience. The budget was developed using a zero-based budgeting (ZBB) approach, consistent with Commission direction in D.21-05-031. Each program budget reflects the minimum resources required to deliver the proposed activities and achieve forecast benefits, accounting for delivery type, measurement method, segment objectives, and sector-specific barriers.

The budget request for regional programs is largely consistent with BayREN’s 2028-2031 budgets as approved by D.23-06-055, with a modest increase primarily for additional incentive funds. The administrative and marketing/outreach budgets have been decreased below what was previously estimated for this time period, while incentives are proposed to increase in order to reach more of the equity populations BayREN prioritizes and better assist them with reducing their

³⁸ D.19-12-021 at 39.

utility costs through energy efficiency while also ensuring they are not left behind in the energy transition.

BayREN's statewide HES California program, which launched at the start of 2026, was not included in the budget prepared for the 2024-2031 Business Plan. The Commission awarded \$9.9 million for the program in D.23-06-055 and approved BayREN's request for authorization to develop and implement the program, submitted as Advice Letter 28-E, in 2024. Given that this funding covered two years of program operations, the proposed four-year budget of \$23,267,129 represents a modest increase due to inflation, as well as conservative estimates of increased demand as the program gains traction throughout the state.

For the second four-year period of 2032-2035, BayREN applied cost escalations between 2% and 3% for various components of its budget to account for anticipated increases in labor, materials, and delivery costs, while maintaining steady-state program delivery and continuity of service. This approach preserves cost reasonableness over the full 2028–2035 period and represents a reasonable price escalation assumption to account for anticipated increases in labor and materials costs consistent with inflation and the labor agreements and policies of the BayREN member government agencies.

V. COORDINATION BETWEEN BAYREN AND OTHER PORTFOLIO ADMINISTRATORS

In administering its current portfolio and developing the suite of programs proposed in this Application, BayREN has adhered to the Commission's guidance:

[W]e expect programs offered by different PAs will not significantly overlap, except for programs intended to serve hard-to-reach customers. We maintain a preference for PAs to work collaboratively not only to minimize duplication in non-hard-to-reach customer populations but importantly to strive toward effective regional strategies and complementary program offerings; to be clear, PAs should communicate regularly in the course of administering their portfolios and preparing applications for future cycles; this regular communication is particularly important

in light of the IOUs' solicitations, which could result in the launch of new programs at any time and potentially implicate existing programs offered by other PAs.³⁹

BayREN has complied with the Joint Cooperation Memorandum (JCM) requirements in D.23-06-055 and communicates regularly with other overlapping PAs, including Pacific Gas and Electric Company (PG&E) and Bay Area CCAs. This is consistent with Commission policy that “[a]s long as program administrators and implementers are addressing different aspects of the energy efficiency marketplace, and/or coordinating their efforts in the same geographic area, some overlap may be fine or even positive, especially if the individual entities coordinate their offerings and their outreach to customers.”⁴⁰

BayREN individually met with all geographically overlapping PAs that are developing a 2028-2035 Business Plan application (PG&E, Marin Clean Energy (MCE), and Peninsula Clean Energy (PCE)) to review high-level strategies, share planned portfolio proposals to minimize the risk of program duplication, and discuss coordination approaches for overlapping customer segments to incorporate into the portfolio. Ongoing coordination with other PAs occurs through a combination of formal, required coordination mechanisms and ongoing informal collaboration at both the program and the portfolio levels, including JCMs, regular bilateral meetings between PAs, and statewide and regional collaboratives. For example, BayREN program managers have regular meetings with their counterparts at PG&E, typically once a month. In addition, BayREN participates in bi-monthly Statewide Energy Efficiency Team (SWEET) meetings to coordinate with other statewide PAs, and is also engaged with the California Energy Commission as they explore options for a Home Energy Report System. This ongoing coordination ensures that

³⁹ D.23-06-055 at 89-90.

⁴⁰ D.19-12-021 at 25.

BayREN is not duplicating activities and that its collective efforts are best serving our shared residents, businesses, and institutions, as well as allowing for identification of opportunities to work together on outreach or projects. Regular meetings and solid relationship-building also improve back-end coordination to minimize the risk of customer confusion.

VI. REQUEST FOR CONTINUED AUTHORIZATION FOR PACIFIC GAS & ELECTRIC COMPANY TO ACT AS FISCAL AGENT

Where the Commission has authorized funding for RENs, the Commission relies upon IOUs as fiscal agents to disperse funds to RENs. In D.23-06-055, the Commission found:

The IOU role as a fiscal agent for the CCAs and RENs operating within its territory should be limited to collecting and disbursing funds under the direction of the Commission and should not include a compliance and monitoring function.⁴¹

BayREN continues to have a strong working relationship with PG&E in its role as fiscal agent. BayREN respectfully requests that the Commission continue to authorize PG&E to act as fiscal agent for BayREN.

VII. POLICY RECOMMENDATIONS

In this Business Plan, BayREN sets forth several recommended policy revisions. Specifically, BayREN recommends: refining the definition of Hard-to-Reach to include communities with Access and Functional Needs (AFN) individuals; revising the Net-to-Gross methodology for equity segment program participants; providing continued Integrated Demand-Side Management (IDSM) authority; and ensuring funding continuity for Statewide Programs.

A. Refining the Definition of Hard-to-Reach to Include Communities with Access and Functional Needs (AFN) Individuals

The Commission's definition of Hard-to-Reach seeks to address "those customers who do not have easy access to program information or generally do not participate in energy efficiency

⁴¹ D.23-06-055 at 112, Conclusion of Law 13.

programs due to a language, income, housing type, geographic or home ownership (split incentives) barrier.”⁴² The Commission’s intent with this definition is that programs targeted at HTR customers should prioritize the most underserved customers, because they are likely the *hardest* to reach.⁴³ The current HTR criteria does not include some groups that would appropriately belong in this category, including Access and Functional Needs (AFN) populations.⁴⁴ The unique needs of these individuals during a Public Safety Power Shutoff (PSPS) has already been acknowledged by the Commission. 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. BayREN therefore recommends the following criteria be added to the HTR definition: those communities and customers who have, according to the definition provided in CA Gov’t Code §8593.3(f)(1), Access and Functional Needs (AFN).

B. Revising the Net-to-Gross Methodology for Equity Segment Program Participants

Net-to-Gross (NTG) is used by the Commission to adjust gross energy savings to reflect the portion of savings attributable to program intervention and is used to account for “free-ridership,” meaning savings that would have occurred absent the program. Uniform NTG assumptions are derived from generalized market behavior and applied across customer segments. This approach assumes similar levels of free-ridership regardless of structural barriers, income

⁴² California Public Utilities Commission, “ENERGY EFFICIENCY POLICY MANUAL,” April 2020, <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/energy-efficiency/eepolicymanualrevised-march-20-2020-b.pdf>.

⁴³ D.18-05-041 at 41-42.

⁴⁴ Cal. Gov. Code § 8593.3, (f)(1). AFN populations are defined as “Individuals who have developmental or intellectual disabilities, physical disabilities, chronic conditions, injuries, limited English proficiency or who are non-English speaking, older adults, children, people living in institutionalized settings or those who are low income, homeless, or transportation disadvantaged, including, but not limited to those who are dependent on public transit or those that are pregnant.”

constraints, geographic disadvantage, housing type, or market access and does not reflect the economic and structural realities embedded in the Commission’s own HTR, DAC, and underserved definitions. Where customers face documented barriers—income constraints, accessibility limitations, geographic isolation, or split incentives—free-ridership is materially lower than population-wide averages.⁴⁵ BayREN recommends that the Commission take action to align NTG treatment in light of the structural barriers faced by equity populations and direct the preparation of a study or studies on appropriate NTG treatment for equity participants.

C. Providing Continued Integrated Demand-Side Management (IDSM) Authority

In order to encourage comprehensive and coordinated delivery of energy efficiency and other demand-side measures in PAs’ portfolios, the Commission in D.23-06-055 allowed each PA to submit a Tier 3 Advice Letter proposing to expend a portion of its energy efficiency budget on a pilot basis to allow for integration of IDSM measures. The Commission approved BayREN’s IDSM Advice Letter, along with other PAs’ advice letters, in September of 2025. To allow for continued coordination and integration of energy efficiency and IDSM in the Business Plan period, BayREN recommends that the Commission affirm that approval of the IDSM frameworks identified above extends through the 2028-2035 Business Plan period.

D. Ensuring Funding Continuity for Statewide Programs

As the first non-IOU lead administering a statewide program, BayREN has experienced challenges that are hindering the launch and implementation of its statewide HES California program. Approved funds for 2025 were not received until December or later; unspent and

⁴⁵ Patrick Malone, Nina Ong, and Max Chang, *State Net-to-Gross Ratios* (Cambridge, MA: Synapse Energy Economics, January 23, 2015), <https://www.synapse-energy.com/sites/default/files/NTG-Research-14-053.pdf>.

uncommitted funds are expected to be returned in April 2026 rather than rolling over throughout the 4-year portfolio period; and delivery of 2026 funds has been delayed. As a result, BayREN has had to pause or scale back program operations until payments are received. Therefore, BayREN requests that the Commission clarify that Lead PAs of statewide programs should have access to all approved funds within a portfolio cycle, and that the Statewide PAs should develop a procedure for non-IOU PAs leading a statewide program to have access to an account or mechanism that would allow for continued program operations when funding is delayed by Non-Lead Parties.

VIII. COMPLIANCE WITH THE RULES OF PRACTICE AND PROCEDURE

A. Commission Authority for Filing the Application – Rule 2.1

BayREN files this Application in accordance with D.21-05-031, Ordering Paragraph 5, and Ordering Paragraph 2 of D.23-06-055, Ordering Paragraph 2, which directed all energy efficiency PAs to file energy efficiency business plan and portfolio applications every four years by February 15, beginning in 2022.⁴⁶ The Commission granted an extension to BayREN and all other PAs for this cycle of applications, allowing applications to be filed no later than March 16, 2026.⁴⁷

B. Proposed Scope

BayREN requests that the Commission consider the following issues germane to this Application:

1. Whether the BayREN Strategic Business Plan and Portfolio Plan are reasonable and comply with Commission guidance for REN portfolios.
2. Whether the proposed programs, goals, estimated budget, and metrics are reasonable.

⁴⁶ D.21-04-031 at 81-82, OP 5.

⁴⁷ Peterson, letter regarding “Request for Extension of Time” (December 15, 2025).

3. Whether PG&E should continue to serve as the fiscal agent for BayREN.
4. Whether the Commission should adopt BayREN's policy recommendations.

C. Request for Relief – Rule 2.1

BayREN requests that the Commission:

1. Find that BayREN's Strategic Business Plan and Portfolio Plan comply with Commission precedent;
2. Find that BayREN's Strategic Business Plans and Portfolio Plans proposed goals, estimated budget, and metrics are reasonable;
3. Approve BayREN's Strategic Business Plan, Portfolio Plan, and budget;
4. Direct PG&E to continue to act as fiscal agent for BayREN and authorize PG&E to collect and distribute funds accordingly; and
5. Adopt BayREN's policy recommendations.

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

The legal name and principal place of business of the Applicant is:

ASSOCIATION OF BAY AREA GOVERNMENTS
on behalf of the Bay Area Regional Energy Network
program (BayREN) (CPUC ID #941)
Bay Area Metro Center
375 Beale Street, Suite 700
San Francisco, CA 94105

Applicant is a joint powers authority formed under the laws of California.

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

All correspondence and communications regarding this application should be addressed to:

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Governments on Behalf of the Bay Area
Regional Energy Network*

F. Categorization – Rule 2.1(c)

BayREN proposes that this Application be categorized as a “ratesetting” proceeding under Rule 7.1(e)(2) because it does not clearly fit into any of the categories as defined by Rules 1.3(a), 1.3(d), and 1.3(e). Energy efficiency applications filed by IOUs meet the definition of “ratesetting” in Rule 1.3(e) because the Commission approves rates for each IOU to collect funds to pay for energy efficiency programs. However, the Commission does not set rates via REN applications because RENs are not in the role of revenue collection for Commission-authorized energy efficiency programs.

G. Need for Hearing – Rule 2.1(c)

BayREN has endeavored to provide a sufficient record via the application and testimony to obviate the need for evidentiary hearings. BayREN has developed the schedule set forth below to develop a full record without the need for hearings; if the need for hearings arises, BayREN requests that the resulting hearing schedule allow the Commission to render a final decision on this application with sufficient time to start implementing the programs proposed herein at the start of 2028.

H. Proposed Schedule – Rule 2.1(c)

BayREN proposes the below schedule for consideration of its Application. To support efficient administration of this multi-party proceeding, BayREN encourages the Commission to consolidate all PA Applications and set a common date for Protests and Responses in the consolidated Application so that intervenors need only submit one Protest or Response. Further, BayREN recommends that the Commission solicit intervenor policy recommendations and issue a determination on which policy recommendations will be in scope early in the proceeding. BayREN does not believe hearings will be necessary; however, if hearings are held, hearings should be limited to PA programs and budgets, not policy matters which are better suited for comments or briefing.

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

Activity	Proposed Schedule
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

I. Safety – Rule 2.1(c)

In D.16-01-017, the Commission adopted an amendment to Rule 2.1(c) requiring Applications to clearly state “relevant safety considerations.” This Application does not raise any safety issues because it is limited to seeking Commission approval of BayREN’s goals, strategies, and budget for encouraging its customers to adopt energy savings measures. BayREN may contract with third parties to provide energy efficiency interventions. BayREN’s contracts with third-party energy efficiency contractors will address safety and will provide criteria and requirements for providers to safely operate in compliance with legal and regulatory requirements.

J. Articles of Incorporation – Rule 2.2

ABAG is a joint powers agency formed in 1961 pursuant to California Government Code Section 6500, *et seq.*, and the council of governments for the San Francisco Bay Area. BayREN, a program of ABAG and the nine Bay Area Counties, is engaged in the provision of energy efficiency and integrated demand side management programs under the authority granted by the Commission.

K. Authority to Increase Rates Not Applicable – Rule 3.2

Rule 3.2 requirements do not apply to this Application because BayREN does not request authority to increase rates or to implement changes that would result in increased rates. BayREN does not collect revenues for EE programs; rather, energy efficiency funding collected by PG&E is allocated to BayREN.

L. 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.

M. List of Supporting Documents

BayREN includes several documents to support this Application. The separate Notice of Availability served concurrently with this Application includes links to the following documents:

- | | |
|--|---|
| Exhibit BAYREN-01 | Testimony in Support of the Bay Area Regional Energy Network’s 2028-2031 Portfolio Plan and 2028-2035 Business Plan |
| Exhibit BAYREN-02 | Program Cards |
| Exhibit BAYREN-03 | CEDARS Filing Receipts and Notice of Availability |
| Exhibit BAYREN-04 | Appendices |
| BAYREN Application Excel Workbook | |

IX. CONCLUSION

BayREN thanks the Commission for its consideration of this Application and for providing BayREN with the opportunity to serve its communities with these critical and transformative programs. BayREN respectfully requests the Commission expeditiously approve this Application.

Respectfully submitted,

/s/ Sheridan Pauker

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*Counsel for the Association of Bay Area
Governments on Behalf of the Bay Area Regional
Energy Network*

March 16, 2026

**APPENDIX A
VERIFICATION**

I am the portfolio administrator of BayREN and am the Director of the Energy Section of the Association of Bay Area Governments, 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 16, 2026 at San Francisco, California.

/s/ Jane Elias
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