

Proceeding: A.26-03-
Exhibit No.: I-REN-05
Date: September 30, 2026
Witness(es): Dailey, Casey
Druyon, Benjamin
Marchant, Margaret
Larson, Kristin
Wright, Will
Barba, Nancy

I-REN

Exhibit 5: Supplemental Testimony in Response to ALJ Ruling

Note: Pursuant to Rule 11.6 of the Commission's Rules of Practice and Procedure, Inland Regional Energy Network requested that the final date to submit all information directed in the September 2, 2026 *Administrative Law Judge's Ruling Directing Submission of Corrections and Supplemental Information from all Business Plan Applicants* be extended to September 30, 2026. The Administrative Law Judges Fitch and Kao granted this extension in the September 9, 2026 *Email Ruling Granting Motion for Extension of Time to Comply with September 2, 2026 Ruling*.

1. “Portfolio Level Impacts Summary” tables with Portfolio Level changes

The following tables show that there were no changes to I-REN's budget, total system benefit (TSB), or cost-effectiveness impacts due to the corrections made to the Commission's Avoided Cost Calculator (ACC).

Table 5-1 : Summary of Budget and TSB Impacts

Segment	Original Budget	Revised Budget	Budget % Change	Original TSB	Revised TSB	TSB % Change
2028-2031 Portfolio						
Resource Acquisition	\$0	\$0	0.00%	\$0	\$0	0.00%
Market Support	\$26,170,395	\$26,170,395	0.00%	\$0	\$0	0.00%
Equity	\$35,835,249	\$35,835,249	0.00%	\$2,611,902	\$2,611,902	0.00%
EM&V	\$3,256,757	\$3,256,757	0.00%	\$0	\$0	0.00%
Total Portfolio Excluding C&S	\$65,262,401	\$65,262,401	0.00%	\$2,611,902	\$2,611,902	0.00%
Codes & Standards (C&S)	\$16,156,533	\$16,156,533	0.00%	\$0	\$0	0.00%
Total Portfolio Including C&S	\$81,418,935	\$81,418,935	0.00%	\$2,611,902	\$2,611,902	0.00%

Segment	Original Budget	Revised Budget	Budget % Change	Original TSB	Revised TSB	TSB % Change
2032-2035 Portfolio						
Resource Acquisition	\$0	\$0	0.00%	\$0	\$0	0.00%
Market Support	\$33,426,908	\$33,426,908	0.00%	\$0	\$0	0.00%
Equity	\$3,888,686	\$3,888,686	0.00%	\$3,561,596	\$3,561,596	0.00%
EM&V	\$43,574,403	\$43,574,403	0.00%	\$0	\$0	0.00%
Total Portfolio Excluding C&S	\$80,889,997	\$80,889,997	0.00%	\$3,561,596	\$3,561,596	0.00%
Codes & Standards (C&S)	\$16,327,157	\$16,327,157	0.00%	\$0	\$0	0.00%
Total Portfolio Including C&S	\$97,217,154	\$97,217,154	0.00%	\$3,561,596	\$3,561,596	0.00%

Segment	Original Budget	Revised Budget	Budget % Change	Original TSB	Revised TSB	TSB % Change
2028-2035 Total						
Resource Acquisition	\$0	\$0	0.00%	\$0	\$0	0.00%
Market Support	\$59,597,303	\$59,597,303	0.00%	\$0	\$0	0.00%
Equity	\$39,723,935	\$39,723,935	0.00%	\$6,173,499	\$6,173,499	0.00%
EM&V	\$46,831,160	\$46,831,160	0.00%	\$0	\$0	0.00%
Total Portfolio Excluding C&S	\$146,152,398	\$146,152,398	0.00%	\$6,173,499	\$6,173,499	0.00%
Codes & Standards (C&S)	\$32,483,690	\$32,483,690	0.00%	\$0	\$0	0.00%
Total Portfolio Including C&S	\$178,636,088	\$178,636,088	0.00%	\$6,173,499	\$6,173,499	0.00%

Table 5-2 : Summary of Cost Effectiveness Impacts

Segment	Original TRC	Revised TRC	TRC % Change	PAC % Change	RIM % Change	SCT-Base % Change	SCT-High % Change
2028-2031 Portfolio							
Resource Acquisition	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%
Market Support	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%
Equity	0.06	0.06	0.00%	0.00%	0.00%	0.00%	0.00%
EM&V	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%
Total Portfolio Excluding C&S	0.03	0.03	0.00%	0.00%	0.00%	0.00%	0.00%
Codes & Standards (C&S)	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%
Total Portfolio Including C&S	0.03	0.03	0.00%	0.00%	0.00%	0.00%	0.00%

2. “Summary of Testimony Update Locations” summary table with changes (see template below)

While there were no changes to I-REN’s budget, TSB, or cost-effectiveness impacts due to the corrections made to the Commission’s ACC, I-REN followed the instructions given in the September 2, 2026 Ruling to make other non-substantive corrections to information included in I-REN’s business plan application, as shown in the table that follows.

Table 5-3 : Summary of Testimony Update Locations

Document (Testimony or Excel)	Exhibit	Chapter	Page/Sheet	Table, Figure, or Line Number	Summary of Change
Testimony	1	2	22	Demographic Characteristics Section. Lines 2-3, 5-6 of Clean Version.	Repaired cross-reference links.
Testimony	1	2	24	Demographic Characteristics Section. Lines 6-7 of Clean Version.	Repaired cross-reference link.
Testimony	1	2	27	Climate Impacts Section. Lines 5, 14- 15 of Clean Version.	Repaired cross-reference links.

Document (Testimony or Excel)	Exhibit	Chapter	Page/Sheet	Table, Figure, or Line Number	Summary of Change
Testimony	2	n/a	12	Program Card for IREN-PUBL-002	IREN-PUBL-002 program card had a clerical error in the table cell for Cost Effectiveness (TRC and PAC Test Ratios) for 2028-2031 and showed portfolio-level ratios rather than program-level. This error did not affect the March 2026 CET filing and has been corrected to reflect the accurate CET outputs. There are no updates to TRC and PAC due to the corrected ACC.
Excel	3	n/a	4.1 Program Budget	Row 60	Updated formula to sum all rows in Row 60; Several rows were not included in the summation for all columns.
Excel	3	n/a	4.2 Sector Seg Budget 2032-2035	All	Comma and decimal place format was updated to be the same in all cells.
Excel	3	n/a	4.3 TSB and C&S Targets	Columns G-I, blue cells	Replaced values with zeros for C&S as there are no savings; full portfolio savings were included prior.
Excel	3	n/a	10 Indicators and Metrics	All	Comma and decimal place format was updated to be the same in all cells.
Excel	3	n/a	11 Program Cards	Row 13, Columns S and U	Data transfer error was corrected.

3. Additional responses to ALJ questions

- 1. Does your business plan application consider the impact of the California Air Resource Board's (CARB) potential new rules on Clean Space and Water Heater Standards, or other regional standards? If not, how would your business plan application need to be adjusted if CARB's current proposal is adopted, effective in 2030?*

While I-REN's Business Plan Application was developed before CARB finalizes its Clean Space and Water Heater Standards, I-REN's portfolio was designed with the expectation that California's building sector will continue moving toward greater electrification, improved energy efficiency, reduced greenhouse gas emissions, and increased adoption of high-efficiency technologies. The Application identifies building decarbonization, electrification, climate resilience, workforce readiness, and code compliance as important priorities for the Inland Empire and incorporates strategies intended to help local governments and building professionals adapt to evolving policy requirements and market conditions.

I-REN's portfolio focuses on addressing barriers that often prevent energy and decarbonization projects from moving forward. Through its Public Sector, Workforce Education & Training, and Codes & Standards activities, I-REN provides technical assistance, strategic energy planning, workforce development, code education, permitting support, and project implementation assistance designed to help communities navigate changing

technology and regulatory environments. I-REN's use of Normalized Metered Energy Consumption (NMEC) and custom methodology for measuring savings in its public sector equity resource program allows for flexibility as federal and regional standards evolve and impact Title 24 and the California Public Utilities Commission regulatory framework for energy efficiency programs.

CARB's proposed Clean Space and Water Heater Standards would affect the future building technology market. If adopted, the proposal could influence the availability and prevalence of space and water heating equipment in California. I-REN's portfolio already includes activities that support local understanding and implementation of these technologies, including training for building professionals, support for energy code compliance, electrification-related education, and assistance for public agencies pursuing decarbonization goals.

At the same time, I-REN's stakeholder engagement and evaluation activities have identified workforce limitations, permitting complexity, lack of technical expertise, project funding challenges, and limited awareness of energy efficiency and electrification opportunities as major barriers throughout the region. Those barriers would continue to exist regardless of the specific compliance pathway ultimately adopted by CARB. As a result, many of the services proposed by I-REN are intended to build the local capacity needed to successfully implement future state and regional policy objectives, including potential CARB requirements.

Once CARB adopts a final regulation, I-REN may evaluate opportunities to refine training curricula, technical assistance resources, code education materials, electrification planning support, and other implementation activities to ensure that local governments, contractors, and building professionals have the information and resources needed to effectively respond to the final requirements.

- 2. Provide a third-party solicitation schedule and timeline from 2028 to 2031. Use the solicitation schedule posted to the California Energy Efficiency Coordinating Committee website, available at <https://www.caeecc.org/market-rate-ee-r25-04-101>, for reference and required fields.*

Not applicable.