

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

Application of County of Ventura for
Approval of 2024-2031 Strategic Business
Plan, 2024-2027 Portfolio Plan, and Budget.

Application 22-03-
(Filed March 4, 2022)

**APPLICATION OF COUNTY OF VENTURA
FOR APPROVAL OF 2024-2031 STRATEGIC BUSINESS PLAN,
2024-2027 PORTFOLIO PLAN, AND BUDGET**

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I. ABOUT 3C-REN

The Tri-County Regional Energy Network (3C-REN) is a partnership between the Counties of San Luis Obispo, Santa Barbara and Ventura established to deliver energy-saving programs and industry trainings that help reduce energy use, strengthen local job markets, and support efforts to achieve climate goals in the Tri-County Region. The tri-counties have worked together since July 2014 to provide energy efficiency financing and outreach services within the three counties, 25 incorporated cities, and 63 special districts. In 2018, 3C-REN was approved by the California Public Utilities Commission (Commission) to become a Regional Energy Network (REN) dedicated to serving hard-to-reach (HTR) customers.

3C-REN files this Application in accordance with Commission Decision (D.)21-04-031 which directed energy efficiency program administrators to “file applications on February 15, 2022

for program year 2024.”¹ The Commission granted an extension to 3C-REN and other Program Administrators (PAs), allowing applications to be filed no later than March 4, 2022.² As such, this Application is timely filed.

In this Application, 3C-REN requests \$71,367,489 for the four-year portfolio period and \$155,367,654 for the full eight-year strategic plan period, inclusive of Evaluation, Measurement, and Verification (EM&V) funding, to continue operating four existing, successful programs and launch three new programs to fill gaps in energy efficiency services, pilot innovative programs, and HTR customers. These seven programs span four customer market segments: Agricultural, Commercial, Cross-Cutting, and Residential. Over the course of the four-year portfolio period, the over two-thirds of 3C-REN’s budget is dedicated to the Equity Segment (65%); the remainder of 3C-REN’s proposed budget is dedicated to: Market Support (20%), Codes and Standards (11%) and EM&V (4%).

II. OVERVIEW OF THE 3C-REN APPLICATION AND TESTIMONY

A. Executive Summary

3C-REN's vision is to build a resilient energy ecosystem that supports Federal, state, and local climate goals through the delivery of integrated energy saving and decarbonization programs that empower a sustainable local economy and reduce social disparities in the Tri-County Region.

3C-REN will achieve this vision by pursuing three core principles:

Principle: Provide equitable opportunities for hard-to-reach, disadvantaged, and underserved communities to receive the many benefits offered by more energy efficient and resilient homes and businesses.

¹ D.21-04-031 at 81-82, Ordering Paragraph 5.

² Letter from Commission Executive Director Rachel Peterson, Re: Request for Extension of Time to Comply with Ordering Paragraph 5 of Decision 21-05-031, dated January 26, 2022.

Principle: Be a trusted local resource and communication channel for energy efficiency and decarbonization to address the climate crisis and build regional resilience.

Principle: Enhance regional economic vitality by growing the market for energy projects and developing a local workforce with the expertise and resources to implement those upgrades.

In its Application, 3C-REN proposes programs and strategies that are designed to support equitably achieving California’s climate and energy goals by serving the Tri-County Region’s over 1.5 million residents and nearly 42,000 businesses in the Tri-County Region. The 3C-REN Strategic Business Plan 2024-2031 (Business Plan)³ builds upon 3C-REN’s successes as a PA since 2018 and incorporates feedback from a multitude of stakeholders that were engaged in preparation for the development of the Plan. At its foundation, the Plan is guided by the California’s goals of doubling energy efficiency (EE) in existing buildings by 2030,⁴ reducing emissions from existing buildings at least 40 percent below 1990 levels by 2030,⁵ achieving 100 percent renewable and zero-carbon retail electricity,⁶ and becoming entirely carbon neutral by

³ Exhibit 3C-REN-01.

⁴The Clean Energy and Pollution Reduction Act (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.

⁵Assembly Bill 3232 requires the California Energy Commission (CEC) to prepare a Building Decarbonization Assessment, in consultation with the California Public Utilities Commission (CPUC), California Air Resources Board (CARB) and the California Independent System Operator. This report assesses the potential for California to reduce greenhouse gasses from buildings by 40% below 1990 levels by 2030.

⁶Senate Bill 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.

2045.⁷ The Plan is also guided by the state’s increased focus⁸ on identifying and addressing barriers to advancing EE and decarbonization in low-income and disadvantaged communities, as well as the Commission’s most recent Environmental and Social Justice Action Plan update.⁹

As described in more detail below, RENs are limited to undertaking (1) activities that IOU or CCA PAs cannot or do not intend to undertake (Gap Filling); (2) 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 (Pilot); and/or (3) activities serving HTR markets, whether or not there is another utility or CCA program that may overlap (HTR).¹⁰ The Tri-County Region is geographically, socio-economically, and racially diverse, which has left many opportunities for filling gaps, piloting and serving hard-to-reach markets.

D.21-05-031 directed “program administrators to further segment their portfolios based on the primary program purpose, into the following three segments”: (1) Resource Acquisition, (2) Market Support; and (3) Equity.¹¹ That Decision further observed that “RENs, by their nature and primary purposes, are more likely to have a greater share of their portfolio devoted to market

⁷In September 2018, former Governor Jerry Brown issued Executive Order B-55-18 to achieve carbon neutrality statewide by no later than 2045.

⁸See e.g. SB 350 and SB 1477.

⁹ CPUC Environmental & Social Justice Action Plan, Version 2.0 Draft (ESJ Action Plan), available at <https://www.cpuc.ca.gov/news-and-updates/newsroom/environmental-and-social-justice-action-plan>.

¹⁰ D.19-12-021 at 32. 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 IOU’s].” D.18-05-041 at 100.

¹¹ D.21-05-031 at 14-15.

support and/or equity programs.”¹² RENs are also eligible to run codes and standards programs, which lie outside of both the REN “buckets” and the portfolio segmentation “buckets.”¹³

In order to implement its eight-year vision, 3C-REN has developed the 3C-REN Portfolio Plan 2024-2027 (Portfolio Plan).¹⁴ The Portfolio Plan proposes seven programs – the extension of four existing programs and the launch of three new programs – with a heavy focus on the Equity Segment and the Market Support Segment.

B. Strategic Business Plan 2024-2031

3C-REN’s Business Plan¹⁵ sets forth 3C-REN’s eight-year vision for serving Tri-County communities with impactful energy efficiency opportunities tailored to the region. In order to develop the Strategic Business Plan, 3C-REN undertook a Market Needs Assessment report to inform workforce, education, and training (WE&T) and codes and standards (C&S) program development and focused on extensive stakeholder engagement to determine program offerings that addressed the Tri-County Region’s most pressing needs.

This extensive process culminated in the development of 3C-REN’s portfolio strategies:

¹² D.21-05-031 at 23.

¹³ As the Commission noted in D.19-12-021, “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.”

¹⁴ Exhibit 3C-REN-02.

¹⁵ Exhibit 3C-REN-01.

Portfolio Strategy 1. Connect customers with 3C-REN programs as well as CCAs’ and other PAs’ offerings to deliver holistic, equitable solutions for energy and resiliency.

Portfolio Strategy 2. Establish compelling, portfolio-wide marketing and education that drive demand for energy efficiency and building decarbonization.

Portfolio Strategy 3. Offer comprehensive services to provide the local workforce with the knowledge and skills needed to participate in the advanced energy economy.

3C-REN developed its proposed portfolio of energy efficiency program offerings to meet the needs of Tri-County Region communities and to execute on its strategic Portfolio Strategies.

C. Portfolio Plan 2024-2027

The 3C-REN Portfolio Plan 2024-2027 (Portfolio Plan)¹⁶ implements the 3C-REN Strategic Plan, Business Plan, and Portfolio Strategies to deploy meaningful energy efficiency programs serving the myriad Tri-County Region communities and populations. The Portfolio Plan proposes seven programs, serving three portfolio segmentations, and four market sectors. The following tables provide an overview of the programs proposed to be offered by 3C-REN. The first provides an overview of each proposed program’s segmentation, REN-specific “bucket,” Portfolio Plan budget for 2024-2027, and Business Plan budget for 2024-2031. The second shows the proposed budget by sector and includes the budget for Evaluation, Measurement and Verification (EM&V). Each program is further described in Section VI below.

¹⁶ Exhibit 3C-REN-02.

3C-REN Program	Market Sector	REN Activity			Existing or New	Portfolio Plan Budget (\$)*** 2024-2027	Strategic Plan Budget (\$)*** 2024-2031
		Gap Filling	Pilot	HTR*			
MARKET SUPPORT							
Agriculture Technical Assistance	Agriculture	X			New	3,035,434	6,538,938
Building Performance Training	Cross-Cutting	X			Existing	9,439,825	21,340,806
Energy Assurance Services	Cross-Cutting	X		X	New	1,778,906	3,939,661
EQUITY							
Commercial Marketplace	Commercial	X		X	New	10,015,293	21,379,645
Single Family Home Energy Savings	Residential	X		X	Existing	19,772,391	41,931,865
Multifamily Home Energy Savings	Residential	X		X	Existing	16,651,320	37,274,745
CODES AND STANDARDS							
Energy Code Connect	Cross-Cutting	X			Existing	7,819,621	16,747,290
EM&V							
3C-REN EM&V						785,042	1,709,043
CPUC EM&V						2,069,657	4,505,662
TOTAL							
7 Programs	4 Market Sectors	X		X	4 Existing 3 New	71,367,489	155,367,654
<p>*In addition to HTR and DAC, 3C-REN’s portfolio prioritizes other vulnerable communities including but not limited to rural, hard-to-count, underserved, ESJ communities, disadvantaged workers, socially disadvantaged farmers, and the public sector entities serving these customers. While they may not meet the CPUC definition of HTR, which has been acknowledged as potentially being “overly narrow” (CPUC D.18-05-041 at 48), these customers are often underrepresented in traditional energy efficiency programs. Prioritizing these communities aligns with 3C-REN’s strategic framework and its commitment as an organization to diversity, equity, inclusion and justice (DEIJ); and it supports the CPUC’s recent guidance in D.21-05-031 regarding equity and market support programs. In this application 3C-REN has proposed a policy recommendation to expand the HTR definition to include public sector.</p> <p>**Program budgets without evaluation, measurement and verification (EM&V) costs.</p>							

By sector, 3C-REN requests the following budget for the four-year portfolio period:

Sector	2024	2025	2026	2027	Total	% of Total
Agriculture	714,806	744,819	772,707	803,102	3,035,433	4%
Commercial	2,401,251	2,464,141	2,544,871	2,605,030	10,015,294	15%
Residential	8,452,524	8,934,494	9,229,649	9,807,044	36,423,712	53%
Cross-Cutting	4,343,863	4,517,819	4,906,850	5,269,819	19,038,351	28%
Total	15,912,444	16,661,273	17,454,078	18,484,995	68,512,790	100%

III. THE ROLE OF RENS IN THE ENERGY EFFICIENCY CONTEXT

A. 3C-REN Program Administration

1. *RENs Are Program Administrators*

RENs are PAs of energy efficiency programs. RENS do not implement programs of IOUs; rather, RENS have their own portfolio of energy efficiency programs.

RENs began as a regional pilot concept in D. 12-05-015, which invited local governments to submit Program Implementation Plans (PIPs) for the 2013-2014 program years.¹⁷ In D.12-11-015, the Commission approved the first two RENS for the 2013-2014 program years: BayREN and Southern California Regional Energy Network (SoCalREN).¹⁸ This Decision made clear that RENS are PAs, not third-party programs or local government partnerships of IOUs.¹⁹ D.14-10-046

¹⁷ D.12-05-015 at 404.

¹⁸ Southern California Regional Energy Network and Bay Area Regional Energy Network. D.12-11-015.

¹⁹ “[T]he key aspect of the REN proposals that sets them apart from third party programs or other local government partnerships (LGPs) is the selection process itself. Instead of being a part of a utility portfolio, along with the LGPs and the third-party programs, the RENS are distinguished by their selection process, which is handled by the Commission instead of by the utilities.” D.12-11-015 at 8.

continued funding BayREN and SoCalREN as pilots for program year 2015.²⁰ When the Commission provided guidance for initial energy efficiency rolling portfolio business filings in D.16-08-019, the Commission maintained the status of RENs as pilots.²¹ D.18-05-041 continued the approach of allowing RENs to be PAs and adopted the Business Plans for years 2018-2025 of three RENs: BayREN, SoCalREN, and 3C-REN.²²

In D.19-12-021, the Commission provided additional guidance regarding the treatment of RENs as PAs. In particular, the Commission solidified the role of RENs in the energy efficiency administrator space. The Commission then stated: “RENs have now been in existence since late 2012. As such, they are a reality within the landscape of the Commission’s energy efficiency policy. Thus, we see no further purpose served by applying the label of ‘pilot’ to them.”²³ This decision also imposed additional requirements on new RENs.²⁴ As an already-existing REN, these additional requirements are not applicable to 3C-REN.

2. *3C-REN Has a Proven Track Record as a Program Administrator Since 2019*

3C-REN has a proven track record as a PA of energy efficiency funds since 2019.

²⁰ D.14-10-046 at 161.

²¹ D.16-08-019 at 2.

²² D.18-05-041 at 2.

²³ D.19-12-021 at 17.

²⁴ “Any new REN will be required to demonstrate unique value in achieving state goals, represent more than one local government entity, to coordinate with existing program administrators in their geographic area prior to filing their business plan, to vet their proposal with stakeholders through the California Energy Efficiency Coordinating Committee (CAEECC), and to explain their REN governance structure in their business plan filing.” D.19-12-021 at 2.

Transforming Farmworker Housing. In October 2020, 3C-REN's residential Home Energy Savings (HES) program completed a large-scale collaborative energy efficiency upgrade of farmworker housing. The project leveraged Energy Savings Assistance (ESA), Low Income Weatherization Program (LIWP), and 3C-REN's Home Energy Savings program. 3C-REN installed 197 heat pump water heaters (HPWHs), making this project responsible for the vast majority of heat pump installs in the Tri-County Region to date. The conversion from gas storage water heaters to HPWHs will result in significant greenhouse gas emissions reductions. To offset the increase in electricity use, solar PV was also installed through the LIWP program to lower utility bills for residents.

Pivoting in Response to COVID-19. With the onset of the COVID-19 pandemic, 3C-REN in-person trainings and outreach quickly pivoted to online trainings. The transition to digital presentations became seamless once content was tailored to online program delivery and as instructors gained comfort with the platforms. By mid-April, the Building Performance Training (BPT) program was set up for online training via Zoom. Most planned courses were delivered in 2020, keeping local building industry professionals in the Tri-County Region engaged. Similarly, 3C-REN's Home Energy Savings (HES) residential direct install program quickly pivoted to providing virtual home assessments and self-install packages to provide participants immediate energy savings, continue engaging and educating the public, and to raise awareness of HES program resources. The self-install packages included LED lights, a smart power strip, and educational material. The program delivered the self-install packages to 178 participants. Despite program delays and obstacles presented by COVID-19, the program completed 284 direct install projects.

Extensive Codes and Standards Offerings in the Local Community. In 2020 alone, 3C-REN's Energy Code Connect offered 16 trainings and 5 forums for a total of 21 events, with over 500 total event attendees. In 2021, total events increased to 28 with over 600 total event attendees. 3C-REN's Energy Code Coach service launched January 2nd, 2020, in conjunction with the launch of the 2019 Energy Code cycle.

Driving Local Workforce Training and Development. 3C-REN's successful Building Performance Training (BPT) program is a Workforce, Education and Training (WE&T) program that achieved 200% growth between 2019 to 2021 in both the total number of events held (from 18 to 54) and the total number of event attendees (from over 350 to over 1,100). The success of this program is due in large part to effective collaboration with over 35 unique partners, from contracted trainers that engage attendees with their expertise to industry associations and non-profits that promote 3C-REN events to their networks. New partnerships with high schools and community colleges have brought younger audiences into the program, which is being designed to ladder students from the classroom to the professional realm.

B. The Context of REN Program Offerings and Portfolio Segmentation

1. *RENs Are Allowed to Offer Programs That IOUs and CCAs Do Not Intend to Undertake, Pilot Programs, and Programs Serving Hard-to-Reach Customers*

A key element that differentiates RENs as PAs compared to IOU or CCA PAs is that RENs are constrained in which programs they are allowed to offer. This limited role has been applied to RENs since RENs were first authorized in 2012.²⁵ In D.19-12-021, the Commission updated and

²⁵ D.12-11-015 at 17.

clarified the limited role of RENs and the criteria that the Commission would use to evaluate whether to approve approving new or renewed REN business plans:

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

- Activities that utilities or CCA program administrators cannot or do not intend to undertake.
- 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.²⁶

This limited role, however, is not an unimportant role. The Commission has consistently acknowledged the importance of the REN 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.”²⁷

2. RENs May Serve Any Area of Portfolio Segmentation

D.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

²⁶ D.19-12-021 at 32. 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 IOU’s].” D.18-05-041 at 100.

²⁷ D.19-12-021 at 18.

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 Commission’s Environmental and Social Justice (ESJ) Action Plan; Improving access to energy efficiency for ESJ communities, as defined in the ESJ Action Plan, may provide corollary benefits such as increased comfort and safety, improved indoor air quality, and more affordable utility bills, consistent with Goals 1, 2, and 5 in the ESJ Action Plan.²⁸

D.21-05-031 further noted that codes and standards (C&S) programs remain distinct from these categories.²⁹ While IOUs and CCAs are limited in their ability to serve market support and equity programs, RENs have been exempted from this 30% cap. 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.”³⁰ 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.”³¹

²⁸ D.21-05-031 at 14-15.

²⁹ D.21-05-031 at 22.

³⁰ D.21-05-031 at 2, emphasis added.

³¹ D.21-05-031 at 23.

IV. OVERVIEW OF PROPOSED 3C-REN PROGRAM OFFERINGS

The portfolio of programs proposed by 3C-REN consists of largely of Equity Segment and Market Support programs, balanced with and one Codes and Standards Program. Each Program has been tailored to serve one or more REN “buckets”: gap filling programs, pilot programs, and programs serving HR customers.

A. Agriculture Technical Assistance

A new market support program addressing unmet needs in the agricultural sector through partnership-building and customized technical assistance. The program will provide specialized support for indoor agriculture/cannabis and water-energy nexus measures, and focused outreach to smaller producers and socially disadvantaged agricultural customers.

B. Commercial Marketplace

A new equity program targeting Disadvantaged Communities (DACs) and HTR customers by offering commercial sector programs for small- and medium-sized businesses who are in a leased or rented facility. 3C-REN will collaborate with already-established business programs; use a multilingual approach to outreach and education; and work with 3C-REN's successful Building Performance Training program to utilize trained local contractors.

C. Energy Code Connect

A continuation of an existing codes and standards cross-cutting program that provides technical assistance delivered by Energy Code Coaches, regional forum events, and locally-focused training courses. The program has established the Tri-County Region as a leader in California Energy Code and Green Building Standards compliance, enforcement, and comprehension.

D. Building Performance Training

A continuation of an existing workforce education and training (WE&T) market support cross cutting program that acts as the Tri-County Region's training and resource hub by providing the latest building science practices and energy efficiency trainings. By offering WE&T programs locally, 3C-REN is making clean energy jobs and training accessible to HTR workers and those in identified DACs by removing the locational barriers to these opportunities and building local connections within the residential and commercial design, construction, and related industries.

E. Energy Assurance Services

The new commercial and public market support cross cutting program will identify energy savings opportunities and offer technical support including audits and benchmarking to achieve comprehensive load management, energy savings and resilience objectives, modeled after the existing Energy Assurance Services program currently operated by Santa Barbara County. The program will further support public agencies and special districts in pursuing energy upgrades by offering educational and networking opportunities to agency staff and specialized services to support planning for, funding, and contracting the work.

F. Single Family Home Energy Savings

An existing single family residential equity program targeted towards HTR single-family households that delivers measurable energy savings. Savings will be claimed using a population Normalized Metered Energy Consumption (NMEC) Measurement and Verification (M&V) platform. The program implementer, Recurve, will deliver energy upgrades utilizing a network of energy efficiency installers (aggregators) who will be paid incentives based on the metered savings achieved with their installations. Performance based incentives will push aggregators to maximize both customer savings and grid benefits.

G. Multifamily Home Energy Savings

An existing multi-family residential equity program that will continue to deliver energy savings targeting HTR multifamily properties. The program requires three or more upgrades in the project scope, a percentage of which must directly benefit tenants, that achieve a minimum GHG savings per apartment. The program includes no-cost site assessments, technical assistance, and rebates paid directly to property owners/managers. The incentive structure also includes enhanced incentives for underserved properties and adders for high performance measures, such as heat pumps.

V. OVERVIEW OF 3C-REN BUDGET, COST EFFECTIVENESS AND VALUE TO RATEPAYERS

A. Budget Overview

1. *Commission Guidance on REN Budgets*

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.”³² As such, 3C-REN has evaluated each program proposed for this proportionality, taking into account plans to serve HTR customers.

2. *3C-REN’s Proposed Budget Is Reasonable and Should Be Approved*

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

³² D.19-12-021 at 39.

served by non-statewide and non-regional programs, while taking into account plans to serve hard-to-reach customers.”²⁴ As such, 3C-REN has evaluated each program proposed for this proportionality, taking into account plans to serve HTR customers. 3C-REN’s budget is just and reasonable and should be adopted.

B. Cost Effectiveness and Value to Ratepayers Overview

1. RENs Are Subject to Value-Based Criteria, Not a Minimum Cost-Effectiveness Threshold

Due to REN’s unique and limited role as Commission-authorized PAs, the Commission has not imposed the same minimum cost-effectiveness threshold on RENs as it has imposed on IOU and CCA PAs. 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.³³

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.”³⁴

³³ D.18-05-041 at 95.

³⁴ D.19-12-021 at 37.

This approach 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 greater.”³⁵ With regard to market support and equity programs, the Commission stated that “all program administrators, including the RENS, should focus on developing metrics and criteria for evaluating progress of those market support and equity programs, in the absence of strict cost-effectiveness limitations.”³⁶

Instead of evaluating RENS on a minimum cost effectiveness threshold, the Commission has historically evaluated each REN’s programs’ ability to: provide value (or the promise of value), meet their designated targets, and track, and hopefully improve upon, their cost-effectiveness.³⁷ 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.”³⁸

³⁵ D.21-05-031 at 22. Emphasis added.

³⁶ D.21-05-031 at 23.

³⁷ 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.”

³⁸ D.19-12-021 at 37.

Furthermore, REN administrative costs have had a “soft cap” of 10% and are also subject to a “soft cap” of 6% for administrative and outreach costs.³⁹ D.21-05-031 maintained the same administration cost and marketing and outreach cost rules.⁴⁰

2. 3C-REN Has Focused on Value-Driven Approaches in Its Portfolio

Regarding the proposed programs set forth in this Application, 3C-REN has focused on bringing equity and environmental and social justice to the Tri-County Region. To this end, 3C-REN has set forth the following principles, strategies and desired outcomes.

PRINCIPLES		
Provide equitable opportunities for hard-to-reach, disadvantaged and underserved communities to receive the many benefits offered by more energy efficient and resilient homes and buildings.	Be a trusted local resource and communication channel for energy efficiency and decarbonization to address the climate crisis and build regional resilience.	Enhance regional economic vitality by growing the market for energy projects and developing a local workforce with the expertise and resources needed to implement those upgrades.
Alignment		
<i>3C-REN Strategic Plan Vision; Portfolio Strategies</i>		
STRATEGIES		
Connect customers with 3C-REN programs as well as CCAs’ and other PAs’ offerings to deliver holistic, equitable outcomes.	Establish compelling, portfolio-wide marketing and education that catalyzes demand for energy efficiency services and building decarbonization.	Offer comprehensive services to provide the local workforce with the knowledge and skills needed to participate in the advanced energy economy.
Alignment		

³⁹ D.12-11-015 at 15. “First, there is a hard administrative cost cap of 10% and a soft marketing and outreach cost cap of 6% imposed by D.09-09-047. The 10% administrative limit is also a soft cap for LGPs. For these purposes, RENs and MEA are more like LGPs – we will not apply hard caps on these expenses at this time, though we encourage RENs and MEA to keep administrative and marketing costs down as low as possible.” (Emphasis added.)

⁴⁰ D.21-05-031 at 33. “Administration costs should continue to be capped at ten percent of the program administrator’s portfolio; all other budget caps or targets, including for direct-implementation non-incentive costs and marketing and outreach costs, should remain unchanged.”

<i>Equity segment strategies; Sector strategies and tactics</i>	<i>Market Support segment strategies; Sector strategies and tactics</i>	<i>C&S segment strategies; Cross-cutting WE&T strategies and tactics; all-sector coordination</i>
DESIRED OUTCOMES		
Participation in tailored and existing local energy efficiency programs for hard-to-reach and other audiences in the Tri-County Region.	Implementation of projects that result in measurable energy savings, accelerate achievement of State and local climate goals, and result in economic development benefits.	A well-trained, supported, and sustainable local workforce with the technical skills and knowledge to offer services in compliance with building codes and State goals.
Alignment		
<i>Portfolio metrics; market support and equity segment metrics and outcomes; sector goals and objectives</i>		

VI. COORDINATION BETWEEN 3C-REN AND OTHER PROGRAM ADMINISTRATORS

A. Commission Requirements for REN Program Coordination

In developing the suite of programs proposed in this Application, 3C-REN has extensively coordinated with their IOU and CCA peers, in particular to avoid programmatic overlap. As set forth in D.18-05-041, “RENS’ activities may only overlap with utility PAs’ activities when those activities are targeted at hard-to-reach customers.”⁴¹ The Decision continues: “To the extent that REN activities may overlap with utility programs, it is reasonable with respect to prudent investment of limited ratepayer funds to limit such overlap to programs that target customers with the least likelihood of program information and access.”⁴² In particular, the Commission has required each PA to develop a joint cooperation memo:

Specifically, we will require the PAs (RENS, IOUs and CCA) to develop a joint cooperation memo to demonstrate how they will avoid or minimize duplication for

⁴¹ D.18-05-041 at 165; Finding of Fact 54.

⁴² D.18-05-041 at 175; Conclusion of Law 28.

programs that address a common sector (e.g., residential or commercial) but pursue different activities, pilots that are intended to test new or different delivery models for scalability, and/or programs that otherwise exhibit a high likelihood of overlap or duplication and are not targeted at hard-to-reach customers. For such programs, each PA must explicitly identify and discuss how its activities are complementary and not duplicative of other PAs' planned activities.⁴³

D.18-05-041 required joint cooperation memos between IOUs and RENs to include:

- RENs must include a summary of the programs they intend to run; if **the IOU(s) who shares territory with a REN offers a similar program**, the IOU(s) must also provide the same summary of their program. The summary for each PA's program must include eligible measures, budgets, and target audiences. The RENs and IOUs must describe how they will offer their corresponding portfolios and avoid duplication.
- RENs must also include a discussion section for each program, summarizing how the program meets at least one of the criteria outlined in D.12-11-015, i.e., aimed at hard-to-reach customers (which can overlap with an IOU offering); programs that IOUs do not offer; and pilots not offered by IOUs but with the possibility of scaling.⁴⁴

B. 3C-REN Has Worked to Avoid Overlap with Other Program Administrators, Consistent with Commission Requirements

3C-REN's role is distinct from CCAs, IOUs, and third-party implementers, and reflects the unique capabilities we bring as local governments to the delivery of EE.⁴⁵ Each PA in the 3C-REN territory complements each other's portfolio, encourages innovation, and ensures that all ratepayers are served, and 3C-REN has worked to avoid overlap with other PAs. This is consistent with CPUC 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

⁴³ D.18-05-041 at 97.

⁴⁴ D.18-05-041 at 122.

⁴⁵ D.19-12-021, at 18

geographic area, some overlap may be fine or even positive, especially if the individual entities coordinate their offerings and their outreach to customers.”⁴⁶ Indeed, when the RENs were first approved, the CPUC acknowledged that “[a]ll consumers will be well served if there is close coordination and cooperation between the RENs and the utilities to ensure seamless program offerings and avoid customer confusion.”⁴⁷

3C-REN has established approaches for coordination with other PAs, as described in its Joint Cooperation Memos, for some portions of 3C-REN programs that may allow for and require coordination among programs. These approaches are detailed in the section of the Portfolio Plan entitled Mitigation of Duplication.⁴⁸ 3C-REN provides referrals to complementary programs to program participants when appropriate, in order to support the best possible outcomes for program participants, residents, property owners, businesses, and jurisdictions in the tri-county region. 3C-REN will also continue to participate in Energy Division-led Peer Coordination Groups (PCGs). The PCGs enable collaborative discussions across all PAs throughout the state. For new offerings, 3C-REN will coordinate with other PAs as new and launching programs are contracted and designed in order to operationalize coordination, with an understanding that new market support and equity programs might also provide similar services.

⁴⁶ D.19-12-021 at 25.

⁴⁷ D.12-11-015 at 9.

⁴⁸ Exhibit 3C-REN-02.

C. 3C-REN Seeks Continued Authorization for Southern California Gas Company to Serve as Fiscal Manager for Commission-approved 3C-REN Funding

Where the Commission has authorized funding for RENs, the Commission relies upon IOUs “as fiscal managers to disperse funds to RENs.”⁴⁹ Specifically, “[w]ith respect to RENs, the Commission acts ‘as a regulatory body, overseeing utility expenditures of ratepayer funds.’ We ‘rely on the utilities as fiscal managers to disperse funds to RENs and conduct general management and monitoring activities in compliance with Commission directives. Thus, the RENs will, by necessity, have a contractual relationship with a utility or, in some cases, several utilities.’”⁵⁰

3C-REN continues to have a strong working relationship with Southern California Gas Company (SoCalGas) in their role as fiscal manager. 3C-REN asks the Commission to continue to authorize SoCalGas to act as fiscal manager for 3C-REN, consistent with Commission precedent, and to continue to allow flexibility in the fiscal agent role, consistent with D.19-12-021.⁵¹

VII. POLICY CHANGE RECOMMENDATIONS

In the Business Plan, 3C-REN sets forth several recommended policy revisions. Specifically, 3C-REN recommends: (1) improved data access for PAs; (2) desiloing energy efficiency; and (3) expanding the definition of “hard-to-reach” to include the public sector.

⁴⁹ D.12-11-015 at 8.

⁵⁰ D.14-10-046 at 128.

⁵¹ D.19-12-021 at 43. “On the topic of PG&E’s suggestions to allow more flexibility in the utilities’ fiscal agent role for RENs, we agree that there should be flexibility in payment terms and timing, as long as both parties agree. Thus, we explicitly authorize the utility fiscal agent and a REN to depart from the specific requirements of D.12-11-015 and D.14-10-046, as long as the REN and the utility mutually agree. If they cannot mutually agree, then one party should bring a petition to modify prior decisions to the Commission, to modify the terms, if necessary.”

A. Improved Data Access

Transparent access to needed data is essential for PAs to support the Commission in achieving the state’s ambitious climate and energy efficiency goals, and also for ensuring that programs are able to target HTR and other vulnerable communities to drive equity outcomes. The Commission should clearly indicate its expectation that secure access to customer-authorized billing data should be streamlined by the IOUs as part of their coordination with non-IOU PAs.

B. Desiloing Energy Efficiency and Other Load Management Offerings

3C-REN’s Energy Assurance Services program involves providing a holistic and forward-focused assessment of customer needs and technical assistance to achieve goals related not limited to energy efficiency but also resiliency, sustainability, and other complementary interventions, such as preparing them to implement distributed energy resources (DERs) to offer security from power shutoffs. While ratepayer funds are appropriately intended to save ratepayers money by reducing energy use and therefore reducing the need for energy generation facilities, the funding is restricted to energy efficiency. Distributed energy resources, storage systems, and load-shifting technologies also have the potential to save ratepayers money by reducing impacts on the distribution system. Consideration should be given to allowing ratepayers funds to be used for these programs elements as well.

C. Expansion of the HTR Definition to Include the Public Sector

The Commission should include public sector customers as “hard-to-reach” if they meet the geographic criteria approved in Resolution G-3497 and updated in D.18-05-041, and are classified as a local government, special district, K-12 school, community college, or tribal lands. This modification to the HTR definition strikes the appropriate balance of simplicity and impact while being mindful of the results of the Underserved Working Group. Adding the public sector to the HTR definition will encourage resource acquisition program implementers to focus on HTR

public sector customers because of the increased cost-effectiveness adjustments. This addition will also allow equity sector programs to better serve public sector customers that meet these criteria.

VIII. REQUEST FOR COMMISSION ORDERS

A. Issues to be Considered

3C-REN asks the Commission to consider the following issues germane to this Application:

1. Whether 3C-REN's Strategic Business Plan and Portfolio Plan are reasonable.
2. Whether 3C-REN's Strategic Business Plan and Portfolio Plan comply with the terms of D.21-05-031.
3. Whether the Strategic Business Plan's and Portfolio Plan's proposed goals, estimated budget, and metrics are reasonable.
4. Whether Southern California Gas Company should continue to serve as the fiscal agent for 3C-REN.
5. Whether the policy recommendations of 3C-REN should be adopted.

B. Statutory Authority

D.21-04-031 directed energy efficiency PAs to "file applications on February 15, 2022 for program year 2024, and every four years after that, containing the following elements":

(a) A business plan to cover an eight-year period. The business plan shall serve as a strategic plan for the energy efficiency efforts of the program administrator, and shall contain sector-level strategies, metrics, and an eight-year budget.

(b) A four-year program portfolio, beginning with program year 2024. This portion of the application shall contain: detailed sector and program strategies; annual budgets, totaling to a four-year revenue requirement; cost-effectiveness showings over the four-year period; and implementation plans, or links to them, for all programs

that are currently operating or planned to operate during the four-year portfolio period, with the exception of third-party programs where the contract has not yet been awarded.

(c) The technical inputs given in Table 2 of this decision.⁵²

This Application is responsive to Ordering Paragraph 5 of D.21-04-031. The Commission granted an extension to 3C-REN and other Program Administrators (PAs), allowing applications to be filed no later than March 4, 2022.⁵³

C. Request for Relief– Rule 2.1(c)

3C-REN requests that the Commission approve the proposals that 3C-REN has submitted in this Application and issue a decision no later than July 14, 2022 that grants the following relief:

1. Finds that 3C-REN’s Strategic Business Plan and Portfolio Plan comply with the terms of D.21-05-031.
2. Finds that the Strategic Business Plan’s and Portfolio Plan’s proposed goals, estimated budget, and metrics are reasonable.
3. Approves 3C-REN’s Strategic Business Plan, Portfolio Plan, and budget.
4. Directs (Exhibit 3C-REN-02) to continue to act as fiscal agent for 3C-REN.
5. Adopts the policy recommendations of 3C-REN.

IX. COMPLIANCE WITH THE COMMISSION’S RULES OF PRACTICE AND PROCEDURE

A. Categorization – Rule 2.1(c)

3C-REN 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

⁵² D.21-04-031 at 81-82, Ordering Paragraph 5.

⁵³ Letter from Commission Executive Director Rachel Peterson, Re: Request for Extension of Time to Comply with Ordering Paragraph 5 of Decision 21-05-031, dated January 26, 2022.

to pay for energy efficiency programs. However, the Commission does not set rates via a REN Application because RENs are not in the role of revenue collection for Commission-authorized energy efficiency programs.

B. Need for Hearing - Rule 2.1(c)

3C-REN has endeavored to provide a sufficient record via the application and testimony to obviate the need for evidentiary hearings. 3C-REN does not recommend hearings at this time. If the need for hearings arises, 3C-REN 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 2024.

C. Proposed Schedule – Rule 2.1(c)

3C-REN proposes the following schedule for consideration of its application:

Activity	Proposed Schedule
Application Filed	March 4, 2022
Daily Calendar Notice (Expected)	March 7, 2022
3C-REN Application Workshop	March 16, 2022
Protests Due (Expected)	April 6, 2022
Reply to Protests (Expected)	April 18, 2022
Prehearing Conference	May 11, 2022
Scoping Memo	May 25, 2022
Opening Comments	June 22, 2022
Reply Comments	July 6, 2022
Proposed Decision	August 2022
Final Decision	September 2022

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

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

COUNTY OF VENTURA
800 S. Victoria Avenue, L#1940
Ventura, CA 93009

Applicant is a county 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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Counsel for:
COUNTY OF VENTURA

F. Articles of Incorporation – Rule 2.2

County of Ventura, California is a county created by the Statutes of 1871-2, p. 485. The County of Ventura is a legal subdivision of the State of California and was established as a General Law County in 1873. 3C-REN, a program of Applicant, is engaged in the provision of energy efficiency programs under the authority granted by the Commission.

G. Authority to Increase Rates Not Applicable – Rule 3.2

The Rule 3.2 requirements do not apply to this Application because 3C-REN does not request authority to increase rates or to implement changes that would result in increased rates. 3C-REN does not collect revenues for EE programs; rather, energy efficiency funding collected by Pacific Gas and Electric Company, Southern California Edison, and Southern California Gas Company is allocated to 3C-REN.

H. 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 3C-REN’s goals, strategies, and budget for encouraging its customers to adopt energy savings measures. 3C-REN may contract with third parties to provide energy efficiency interventions. 3C-REN’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.

I. 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 and Chief Administrative Law Judge Anne Simon.

J. List of Supporting Documents

3C-REN includes several documents to support this Application. The separate Notice of Availability served concurrently with this Application includes links to the following documents:

- Exhibit 3C-REN-01 3C-REN Strategic Busines Plan 2024-2031 Testimony
- Exhibit 3C-REN -02 3C-REN Portfolio Plan 2024-2027 Testimony
- Exhibit 3C-REN -03 3C-REN Testimony Appendices

X. CONCLUSION

The County of Ventura thanks the Commission for its consideration of this Application and for providing 3C-REN with the opportunity to serve its communities in the Counties of San Luis Obispo, Santa Barbara and Ventura with these critical and transformative programs. The County of Ventura respectfully requests the Commission expeditiously approve this Application.

Respectfully submitted,

/s/ Elizabeth Kelly
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Counsel for:
COUNTY OF VENTURA

March 4, 2022

Appendix A

Verification

I am an officer of the applicant, County of Ventura, 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 4, 2022 at Ventura, California.

/s/ Alejandra Téllez
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