



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

Protests and correspondence regarding this AL are to be sent via email and are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	



March 15, 2024

California Public Utilities Commission
Energy Division Tariff Unit
505 Van Ness Ave.
Fourth Floor
San Francisco, CA 94102-3298

3C-REN Advice Letter 10-E/9-G
(CPUC # 220)

Tier Designation

This Advice Letter has a Tier 3 designation pursuant to Decision (D.) 23-06-055, Ordering Paragraph (OP) 28 and 29.

Subject

3C-REN Integrated Demand Side Management (IDSM) Advice Letter

Purpose

This advice letter is filed in compliance with OPs 28 and 29 of D.23-06-055, which allow portfolio administrators (PAs) to submit Tier 3 advice letters proposing IDSM program processes to be supported with a set aside of up to 2.5% of portfolio budgets or \$4 million in energy efficiency funding as an operational complement.

Background

The 3C-REN is a collaboration of three counties, Ventura, Santa Barbara, and San Luis Obispo, in the California Central Coast Region, with a diverse service area that is geographically isolated from utility hubs, has pockets of rural and disadvantaged communities, and large, underserved Spanish-speaking populations. After several years' experience and cooperative administration of energy and sustainability programs, the three counties formed the 3C-REN, led by the County of Ventura, to better leverage resources in the delivery of effective programs on a regional level. In D.16-08-0192, the California Public Utilities Commission (CPUC or Commission) provided guidance for Energy Efficiency (EE) Rolling Portfolio Business Plan (BP) filings and included consideration of the formation of new Regional Energy Networks (RENs).

On January 23, 2017, 3C-REN filed a motion for approval of its rolling portfolio business plan and budget proposal to serve public agencies and their constituencies within Southern California Edison's (SCE's), Southern California Gas's (SoCalGas's), and Pacific Gas and Electric's (PG&E's) service territories. 3C-REN was approved and begin offering programs in 2018. In

D.21-05-031 the Commission ordered all PAs to file new business plans under a new framework, creating a new 4-year portfolio plan period and 8-year business plan period. In March 2022, 3C-REN filed a strategic business plan and portfolio business plan application to continue approved and performing programs and approve three more programs. In D.23-05-055, 3C-REN's portfolio business plan and strategic business plan were approved, extending funding through 2031.

3C-REN remains intent on delivering programs that meet CPUC criteria as indicated by D.12-11-015 in the formation and implementation of programs including filling gaps that the investor-owned utilities (IOUs) are not serving; developing programs targeting hard-to-reach markets; and piloting new approaches to programs that have the potential to scale and offer innovative avenues to energy savings.

A. Regulatory Requirements

The provision for IDSM was established in D.23-06-055, allowing proposals for IDSM programs through Tier 3 advice letters until March 15, 2024, for implementation within the 2024-2027 portfolio period.

The aim is to employ an energy efficiency program delivery approach to formulate a comprehensive strategy, enabling customers to execute multi-DER projects and obtain incentives through a unified process.

Funds from non-energy efficiency sources utilized for this purpose must adhere to specified regulations and budgets from respective proceedings or decisions. SCE, PG&E, and SoCalGas have recently demonstrated success in integrated delivery, financial accounting, and savings attribution of multiple demand-side program offerings in the San Joaquin Valley proceeding (R.15-03-010). Results of these collaborative efforts are documented in the IOUs' Quarterly Progress Report on San Joaquin Valley Pilot Projects.

Each Portfolio Administrator (PA) has the choice, but not the obligation, to allocate up to 2.5 percent or \$4 million (whichever is greater) of its energy efficiency budget for the portfolio period, capped at \$15 million, for a pilot program aimed at continuous load shifting to reduce peak consumption. However, this funding should not be directed towards event-based demand response, as it may not lead to continuous or permanent load shifting.

To facilitate innovative approaches, the CPUC allows IDSM programs to be proposed through Tier 3 advice letters by March 15, 2024, for implementation during the 2024-2027 portfolio period. The funding is part of the total energy efficiency portfolio cap and cannot exceed it. PAs have the flexibility to reallocate funds within their portfolios to support IDSM purposes within CPUC guidelines.

IDSM programs may leverage multiple funding streams from various sources, provided there is an energy efficiency component. Incentives from non-energy efficiency sources may be offered within these programs.

The commission specifies that energy efficiency funds should not be used to subsidize the capital costs of technologies that do not contribute to efficiency, such as battery purchases or self-generation technology. Rather, these funds are intended to supplement operational costs. Electric panel upgrades are considered eligible technology, consistent with existing policies on fuel substitution energy efficiency measures.

It is mandatory for PAs to document the utilization of these funds in their annual reports, as outlined in D.19-08-009 and D.23-04-035, in response to feedback from Cal Advocates.¹

B. Filing Requirements

The IDSM advice letter submitted by 3C-REN aligns with the relevant CPUC requirements outlined in D.23-06-055, as outlined below and further elaborated in the IDSM advice letter submission. D.23-06-055 mandates that each Portfolio Administrator (PA)'s advice letter must encompass the following elements:

- Comprehensive disclosure regarding the utilization of non-energy efficiency funding
- Specification of measurement methodologies, including any strategies employed to prevent double-counting of consumption impacts
- References to pertinent regulations and approved budgets from non-energy efficiency resource domains that will dictate the allocation of said funds
- Clear delineation of effective useful life, baselines, and other underlying assumptions
- Additionally, 3C-REN's IDSM advice letter adheres to supplementary guidance issued by the Commission on December 28, 2023.

Discussion

A. Goals and Frameworks

Describe the PA's goals for its new multi-DER IDSM programs or framework.

- ***What outcomes does the PA intend to achieve through its new IDSM programs?***

3C-REN's energy efficiency program portfolio is centered around equity and market support objectives, in alignment with its commitments as a REN to fill gaps in the energy efficiency marketplace, pilot innovative activities, and serve hard-to-reach, underserved, and disadvantaged communities.

As described in its Strategic Business Plan and Portfolio Plan, many of 3C-REN's programs include technical assistance and educational support to achieve goals including but not limited to energy efficiency but also resiliency, sustainability, and other complementary interventions, such as preparing program participants to implement distributed energy resources (DERs).² 3C-REN proposes to include IDSM within this existing framework of programs largely focused on technical assistance and education, to achieve outcomes such as increased awareness of IDSM as well as increased capacity to explore and pursue opportunities related to DERs and load shifting in combination with energy efficiency and electrification.

As noted in the True-Up Advice Letter, 3C-REN intends to allocate IDSM funds across all of its new and existing programs within the direct implementation non-incentive cost category. Through its existing Residential Multifamily program and newly approved Energy Assurance and Agriculture programs, 3C-REN proposes to expand upon no-cost technical assistance (TA) offered through those programs to provide education and technical support related to distributed

¹ D.23-06-055 Section 8.3 IDSM Integration

² 2024-2031 Strategic Business Plan, pg. 24

energy resources that may complement energy efficiency and electrification projects that are core to these programs.

For its existing single family residential program and newly approved commercial marketplace program, 3C-REN proposes to incorporate residential customer and small business education on DER technologies that achieve load shifting and complement energy efficiency projects completed through the programs.

For all of its technical assistance and incentive programs (multifamily, single family and commercial incentive programs, as well as agriculture and Energy Assurance Services TA programs), 3C-REN proposes to provide referrals to programs that offer support or incentives for adoption of IDSM technologies, and support in applying for funding to implement upgrades related to IDSM technologies.

Through its well-established workforce education and training (WE&T) and codes and standards (C&S) programs, IDSM funds will be allocated for offering trainings to public and private sector building professionals on IDSM technology topics such as electric vehicle infrastructure and vehicle-to-grid technology, solar and storage, and smart controls.

- ***What mechanisms will the PA have available to prioritize the DERs that are achieving the most successful outcomes from question 1?***
 - ***What criteria will be used to determine if increased budget should go toward those measures in future portfolios?***

3C-REN will use program performance data and qualitative feedback from implementers, partners and customers to determine if increased budget should go towards priority DERs that achieve portfolio equity and market support objectives.

These objectives include supporting the long-term success of the energy efficiency—and IDSM—market by educating customers, training contractors, building partnerships, or moving beneficial technologies towards greater cost-effectiveness as well as providing and improving access to energy efficiency—and IDSM—to hard-to-reach or underserved customers and disadvantaged communities. 3C-REN technical assistance and education will prioritize IDSM technologies that best reduce peak consumption through continuous load shifting, and that best serve hard-to-reach, underserved and DAC communities.

- ***What metrics or indicators will be used to measure progress toward the outcomes and to determine whether the new programs are successful?***
 - ***Provide details of the measurement approaches, including measurement methods used to disaggregate savings/impact results between energy efficiency and other resources.***

3C-REN may track metrics or indicators including, but not limited to, the number of local government agencies, multifamily properties and agricultural customers leveraging technical assistance services to identify potential IDSM projects, the number of IDSM audits completed, the number of trainings and educational opportunities related to IDSM technologies, and the

number of referrals to programs. 3C-REN will explore ways to track successful adoption of IDSM technologies from referrals.

- ***Does the PA have a way to compare energy savings, cost effectiveness, or other characteristics of the different DERs with each other? (For example, can a TSB facsimile be developed from DER avoided costs?)***

Not applicable to 3C-REN's current plans for IDSM integration in its portfolio, which will support technical assistance and education, but will not directly implement projects. 3C-REN will strive to obtain energy and cost saving information for IDSM projects that are supported by 3C-REN programs and move to implementation.

- ***What baselines or assumptions will be used for the metrics or indicators?***

3C-REN will invest two years of data collection to establish a baseline to best reflect the aforementioned metrics. Data collected in Program Year (PY) 2024 and 2025 will be used to establish baseline in PY 2026.

- ***What timeline will be used for developing and reporting on the metrics or indicators?***

For current programs (WE&T, C&S, Residential), IDSM technologies will begin being integrated into program materials in 2024. For new programs (Agriculture, Commercial), the IDSM activities are projected to begin being integrated into program materials in Q4 2024 and Q1 2025. Beginning with the 2025 Annual Report, educational trainings, number of referrals, and audits related to IDSM activities will be included in the Annual Report. The Annual Report will also include customer engagement and implementation of IDSM recommendations starting in the 2026 Annual Report.

- ***Provide targets if possible. If not, describe how targets will be established.***

Targets will be established following program implementation and initial IDSM integration across all programs. Potential targets include:

- **Public Awareness:** Set targets for increasing public awareness about renewable energy sources and battery storage, their benefits, and the importance of energy conservation and load shifting to reduce peak demand and state emissions. This could involve educational campaigns, workshops, seminars, and educational materials distributed through various channels.
- **Workforce Development:** Establish targets for training and developing a skilled workforce in IDSM technologies. This could include existing WE&T trainings and partnerships with educational institutions to offer relevant courses.
- **Customer Education:** Set targets for educating consumers about IDSM benefits and technologies. This could involve technical assistance through benchmarking and energy audits and consumer awareness campaigns.

- ***What concerns does the PA have regarding the new programs or framework?***

RENs are unique as PAs that fill gaps left by IOUs and target assistance to customers that hard-to-reach. In terms of the new framework, RENs need flexibility to holistically address energy efficiency, DR, and DER commitments to address equity and market support within the context of D.23-06-055. Testing new approaches to integrating an IDSM focus into 3C-REN programs and establishing baselines in the initial years of program implementation will allow for this flexibility.

B. D.23-06-055 Requirements

Follow all requirements from D.23-06-055, as is expected, including but not limited to:

- ***Provide the scope of the multi-DER programs or framework proposed including the technologies and types of programs included.***

3C-REN will expand its new and existing programs to include IDSM as described below:

- Training programs – WE&T and C&S
 - WE&T: Trainings on topics like electric vehicle infrastructure, vehicle-to-grid technology, solar, energy storage, or smart controls for load shifting.
 - C&S: Streamlined permitting and code requirements for IDSM technologies.
- Incentive programs - Residential Single Family and Commercial
 - Customer and business education on technologies that complement energy efficiency such as electric vehicle infrastructure, vehicle-to-grid technology, solar, energy storage, or smart controls for load shifting.
 - Referrals to programs that offer support or incentives for adoption of IDSM technologies, and application support.
- Technical assistance programs - Residential Multifamily, Agriculture and Energy Assurance Services
 - Customer education and technical assistance on technologies that complement energy efficiency such as electric vehicle infrastructure, vehicle-to-grid technology, solar, energy storage, or smart controls for load shifting.
 - Referrals to programs that offer support or incentives for adoption of IDSM technologies, and application support.
- ***Detail the approach to coordination with other DER proceedings including the rules of the non-energy efficiency proceedings involved and any rules for exemptions or deviations from those proceedings if that is applicable.***

Not applicable to 3C-REN’s current plans for IDSM integration in its portfolio; however, 3C-REN is party to and/or monitors numerous CPUC proceedings relevant to IDSM, including but not limited to the following, and is therefore well-positioned to coordinate as needed across other DER proceedings if and when applicable to its portfolio.

- Building Decarbonization (R.19-01-011)

- Microgrids and Resiliency (R.19-09-009)
- Self-Generation Incentive Program (SGIP) (R.20-05-012)
- High DER Future/Grid Modernization (R.21-06-017)
- Electric Demand Flexibility Rulemaking (R.22-07-005)
- DER Cost Effectiveness and Data (R.22-11-013)
- Transportation Electrification Policy and Infrastructure (R.23-12-008)
- ***Detail the funding requirements broken down and separated according to proceeding or other category such as energy efficiency, transportation electrification, customer generation, and so forth. Develop new methods if necessary to show stacking of costs and how those will draw from each funding source and through which procedural path.***

Not applicable to 3C-REN’s current plans for IDSM integration in its portfolio; however, as mentioned in D.23-06-055, 3C-REN will include a list of external funding sources beyond the energy efficiency portfolio funding, if any, in its energy efficiency annual reports.

- ***Include Ex Ante assumptions if there are any for energy efficiency reporting such as project benefits, measurement methods, baseline, and effective useful life.***

Not applicable

- ***Include the Ex Post process: project benefits, measurement methods, list of applicable measurement protocols, project costs, and methodology.***

Not applicable

- ***Include the project cost methodology.***

Not applicable

- ***Describe the reporting process and timing for each piece.***

Not applicable

C. Regarding Rules, Procedures, Requirements

D.23-06-055 says, “To be clear, this decision does not change any rules, budgets, or other policies for non-efficiency resources. Non-energy-efficiency funding used for this purpose will be required to abide by the rules and budgets set forth in their relevant proceedings or decisions.”

- ***Reference applicable rules from non-energy efficiency resource areas that will be used to govern the distribution of funds for non-EE measures.***

Not applicable to 3C-REN's current plans for IDSM integration in its portfolio; however, 3C-REN will adhere to all applicable rules regarding energy efficiency and IDSM.

D. Non-EE Funding

Detail the use of non-energy efficiency funding. D.23-06-055 says, "The advice letters shall include details of the use of non-energy efficiency funding, measurement approaches including any methods that will be used to ensure that impacts on consumption are not double-counted, and references to applicable rules and approved budgets from non-energy efficiency resource areas that will govern the distribution of those funds."

- ***How will IDSM be integrated into existing program plans? Which programs?***

IDSM will be integrated into existing programs (TCR-CS-001, TCR-RES-002, TCR-RES-003, TCR-WET-001) by expanding training and technical assistance programs as mentioned in *D.23-06-055 Requirements*.

- ***What is PA's plan for continuing or updating IDSM efforts taken on via past decision?***

3C-REN's portfolio did not include IDSM efforts prior to 2024.

- ***Provide context for the IDSM programs proposed per the 2023 decision by describing how they complement and/or integrate with IDSM programs authorized by the 2018 decision or other avenues (or whether the programs are simply separate.)***

3C-REN's portfolio did not include IDSM efforts prior to 2024.

- ***Which types of IDSM will the PA implement and how?***

IDSM education and technical assistance will be implemented into new and existing programs as mentioned in *D.23-06-055 Requirements*. Examples of IDSM technologies that may be covered include but are not limited to: electric vehicle infrastructure, vehicle-to-grid technology, solar, energy storage, and smart controls for load shifting.

- ***From where will money come and flow to (including between EE budgets and non-EE budgets)?***

Not applicable to 3C-REN's current plans for IDSM integration in its portfolio; however, as mentioned in *D.23-06-055*, 3C-REN will include a list of external funding sources beyond the energy efficiency portfolio funding, if any, in its energy efficiency annual reports. 3C-REN will also document the cost categories these funds have been used for in its energy efficiency annual reports. Non-CPUC funding such as grants may also be layered with EE IDSM funding.

- *Are there any limits on the amount of funding from non-energy efficiency sources, such as a maximum number of rebates.*

Not applicable.

- *Are any protections or funding reservations needed for 3P procurements? Protections for CPUC, PA, Implementers?*

Not applicable.

E. Balancing Accounts and Sub Accounts

D.23-06-055 says, “The IOUs, in their Tier 3 advice letters, should include establishing balancing accounts with sub-accounts, or utilizing new sub-accounts within existing balancing account, if appropriate, for each non-energy efficiency funding source, to track the relevant costs to be recovered from non-energy efficiency sources. The balancing accounts would be reimbursed based on rebates and incentives from other programs and proceedings, based on the rules for those other resources.”

- *What is the timeframe for integrating IDSM and developing appropriate accounting structures?*

Not applicable to REN PAs. 3C-REN will track IDSM activities and related costs at a cost category level as required by D.23-06-055 through the IDSM programs established in CEDARS in its 2024-2027 budget filing:

- TCR-IDSM-Equity-001: IDSM - Equity
- TCR-IDSM-CS-003: IDSM - Codes & Standards
- TCR-IDSM-MarketSupport-002: IDSM - Market Support

F. Template/Table

Scope	Program or Framework	<i>PA to complete</i>
	Technologies	<i>3C-REN’s current plans for IDSM integration in its portfolio will include activities supporting technical assistance and education, but will not directly implement projects. Technologies covered by technical assistance and education</i>

		<i>activities could include, but will not necessarily be limited to, electric vehicle charging infrastructure, energy storage, smart controls, solar, vehicle-to-grid technologies.</i>
	Programs (or types)	<i>WE&T, C&S, Residential, Agriculture, and Commercial</i>
Approach to Coordination with other DER Proceedings	Proceeding(s) (one per cell)	<p><i>N/A, while 3C-REN is not planning to use external funding, 3C-REN is party to and/or monitors numerous CPUC proceedings relevant to IDSM, including but not limited to the following, and is therefore well-positioned to coordinate as needed across other DER proceedings if and when applicable to its portfolio.</i></p> <ul style="list-style-type: none"> • <i>Building Decarbonization (R.19-01-011)</i> • <i>Microgrids and Resiliency (R.19-09-009)</i> • <i>Self-Generation Incentive Program (SGIP) (R.20-05-012)</i> • <i>High DER Future/Grid Modernization (R.21-06-017)</i> • <i>Electric Demand Flexibility Rulemaking (R.22-07-005)</i> • <i>DER Cost Effectiveness and Data (R.22-11-013)</i> • <i>Transportation Electrification Policy and Infrastructure (R.23-12-008)</i>
	Relevant Rules for Implementation from Proceeding	<i>N/A, please refer to proceedings cell.</i>
	Rules for Exemptions or Deviations (if applicable)	<i>N/A, please refer to proceedings cell.</i>
	Funding requirements	<i>N/A, 3C-REN will include a list of external funding sources beyond the energy efficiency portfolio funding, if any, in its energy efficiency annual reports.</i>
	Approach to draw from each funding source	<i>N/A for 3C-REN's plans for IDSM funding.</i>

	New methods to show stacking of costs	<i>N/A for 3C-REN's plans for IDSM funding.</i>
	Reporting Requirements (incl timing)	<i>3C-REN plans to include IDSM-related educational trainings, referrals, and audits on electric vehicle charging infrastructure, energy storage, smart controls, solar, and vehicle-to-grid technologies in annual reports starting in 2025. 3C-REN also plans to include customer engagement and implementation of IDSM recommendations in annual reports starting in 2026.</i>
	Procedural Path for access to funding	<i>N/A for 3C-REN's plans for IDSM funding.</i>
Consistency with EE	Ex Ante assumptions for energy efficiency reporting such as project benefits, measurement methods, baseline, and effective useful life	<i>N/A, 3C-REN's plan for IDSM integration is founded on educational trainings, referrals, and audits on, but not limited to, electric vehicle charging infrastructure, energy storage, smart controls, solar, vehicle-to-grid technologies, as opposed to DER installations. These IDSM activities will be tracked in annual reports in alignment with its commitments as a REN to fill gaps in the energy efficiency marketplace, pilot innovative activities, and serve hard-to-reach, underserved, and disadvantaged communities.</i>
	Ex Post process: project benefits, measurement methods, list of applicable measurement protocols, project costs, and methodology	<i>N/A</i>

Protest

Anyone may protest this Advice Letter. The Protest must state the grounds upon which it is based. The Protest must be made in writing and received by the Commission within 20 days of the date this Advice Letter was filed with the Commission, or April 4, 2024. There is no

restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

California Public Utilities Commission
CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. It is also requested that a copy of the protest be sent by email to the address shown below on the same date it is mailed or delivered to the Commission.

Mike Pettit
Assistant County Executive Officer
Ventura County
800 S. Victoria Avenue
Ventura, CA 93009
Telephone: 805-654-2864
Facsimile: 805-654-5106
Email: mike.pettit@ventura.org

Alejandra Tellez
Deputy Executive Officer,
Ventura County
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Ventura, CA 93009
Telephone: 805-654-3835
Facsimile: 805-654-5106
E-mail: Alejandra.Tellez@ventura.org

Effective Date

3C-REN requests that this Tier 3 advice filing become effective on regular notice April 14, 2024, which is 30 calendar days from the date of this filing.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to service lists for R.13-11-005 and A.22-02-005 and uploaded to the CPUC Energy Division Advice Letter database (cpucadviceletters.org). Address changes to the General Order 96-B service list should be directed to Alejandra Tellez at Alejandra.tellez@ventura.org or

by calling 805-654-3835. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Respectfully submitted,

/s/ Alejandra Tellez

ALEJANDRA TELLEZ,
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For the 3C-REN, Tri-County Regional Energy Network