

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

Application of County of Ventura (CPUC ID 220) for Approval of the Tri-County Regional Energy Network 2028-2031 Portfolio Plan and 2028-2035 Business Plan.

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

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OF THE TRI-COUNTY REGIONAL ENERGY NETWORK 2028-2031 PORTFOLIO
PLAN AND 2028-2035 BUSINESS PLAN**

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In accordance with Decisions (D.) 21-05-031 and 23-06-055, the County of Ventura, on behalf of the Tri-County Regional Energy Network (3C-REN), files this Application with the California Public Utilities Commission (Commission).¹ Pursuant to the Commission’s December 15, 2025, *Letter Granting Extension of Time to Comply with D.21-05-031 Ordering Paragraph 5 and Ordering Paragraph 2 of D.23-06-055*, this Application is timely filed.²

I. ABOUT 3C-REN

3C-REN is a collaboration and joint venture among the Counties of Ventura, Santa Barbara, and San Luis Obispo to design and administer the delivery of a portfolio of regional, customized energy efficiency (EE) programs.³ The Commission first authorized 3C-REN in D.18-05-041,⁴ and 3C-REN launched its initial programs from 2018-2021.⁵ 3C-REN serves the Tri-

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

² *Letter from Commission Executive Director Rachel Peterson, Re: Request for Extension of Time to Comply with Decision 21-05-031 Ordering Paragraph 5 and Ordering Paragraph 2 of D.23-06-055* (Dec. 15, 2025).

³ See Tri-County Regional Energy Network, “About 3C-REN.” Accessible at: <https://www.3c-ren.org/about-3c-ren/>; see also Exhibit TCR-01: Tri-County Regional Energy Network 2028-2031 Portfolio Plan and 2032-2035 Business Plan Direct Testimony, Chapter 2, p. 1 (Mar. 16, 2026).

⁴ D.18-05-041, pp. 105-109, OP 1 (Jun. 5, 2018).

⁵ See Exh. TCR-01 at Chapter 1, p.4.

County Region along the Central Coast,⁶ which includes 25 incorporated cities and is home to more than 1.5 million residents.⁷

3C-REN's vision is to build a resilient energy ecosystem that helps meet federal, State, and local climate goals through the delivery of integrated energy saving and decarbonization programs that nurture a sustainable local economy and reduce social disparities.⁸ 3C-REN employs three core strategies to effectuate this vision:⁹

- Provide equitable opportunities for equity customers (i.e. hard-to-reach, disadvantaged, and underserved communities) to receive the many benefits offered by more energy efficient and resilient homes and businesses.
- Be a trusted local resource and communication channel for energy efficiency and decarbonization efforts that 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 to implement upgrades.

3C-REN's existing portfolio is comprised of seven programs, each designed to meet the unique needs of the local communities. For residential customers and businesses, 3C-REN offers energy savings incentives, with an emphasis on hard-to-reach (HTR) customers and underserved communities.¹⁰ For industry professionals, 3C-REN offers capacity-building services, including workforce training and technical code support.¹¹ For agricultural customers and critical facilities, 3C-REN offers technical assistance to identify opportunities to save energy and increase

⁶ See *id.* at Chapter 3, p. 3.

⁷ *Id.* at Chapter 2, p. 3.

⁸ *Id.* at Chapter 1, pp. 2-3.

⁹ *Id.* at Chapter 1, p. 3.

¹⁰ “About 3C-REN.” Accessible at: <https://www.3c-ren.org/about-3cren/>.

¹¹ *Id.*

resilience.¹² The proposed portfolio set forth in this Application builds upon these efforts, proposing continuation and expansion of the existing seven programs.

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

A. 3C-REN Business and Portfolio Plan Overview

In this Application, 3C-REN requests \$104,669,626 for the four-year portfolio period, and a total of \$227,688,506 for the full eight-year strategic plan period to continue operation of its existing portfolio of programs. During this portfolio period, 3C-REN will build upon its existing foundation to incorporate refinements responsive to evolving decarbonization goals and affordability concerns, regulatory guidance, and local community feedback.

3C-REN's portfolio of seven programs encompasses four sectors: agricultural, cross-cutting, commercial, and residential. Programs span the Equity, Market Support, and Codes and Standards segments. Broadly, the portfolio is designed to deliver meaningful bill savings, hands-on, technical assistance, leverage community partnerships, and support equity and decarbonization goals by fostering an expanded workforce and education opportunities.

In the initial four-year portfolio period, 3C-REN's portfolio allocates over 70% of its proposed budget to the Equity segment, with the remaining 16% dedicated to the Market Support segment, 8% allocated to Codes and Standards segment, and 4% allocated to evaluation, measurement, and verification (EM&V).¹³ This budget allocation aligns well with 3C-REN's portfolio objectives – to provide equitable opportunities for Equity customers to access EE, to support local workforce development, and to leverage its community relationships to advance local EE and decarbonization efforts.

¹² *Id.*

¹³ *See* Exh. TCR-01 at Chapter 2, p. 24. Note: percentages may not sum due to rounding.

During this portfolio period, 3C-REN's key portfolio refinements include:¹⁴

- **Enhanced quantification of Equity and Market Support impacts**, including affordability outcomes and non-energy benefits, consistent with segment-specific metrics and indicators, and promoting informed decision-making for Environmental and Social Justice (ESJ) Action Plan communities;
- **Advancement of a community-driven resilient energy ecosystem**, emphasizing workforce development, local government partnerships, and capacity building aligned with the Commission's ESJ Action Plan and segment objectives; and
- **Operationalization of lessons learned from 3C-REN's pioneering residential Normalized Metered Energy Consumption (NMEC) program**, including improved performance-based delivery, transparent savings attribution, and alignment with integrated demand-side management strategies encouraged in recent Commission guidance.

B. Overview of Proposed Programs

As described above, 3C-REN proposes the continuation of seven existing programs. The proposed programs include:

- **Agricultural Technical Assistance** — provides specialized support for indoor and outdoor agricultural operations, water districts providing service to agricultural operations, and other agricultural facilities/businesses and water-energy nexus measures. This program is designed to meet the needs of underserved customers.¹⁵

¹⁴ *Id.* at Chapter 1, p. 4.

¹⁵ *Id.* at Chapter 3, p. 35.

- **Commercial Marketplace** — provides technical assistance and incentives to help businesses implement energy savings measures, with a special focus on HTR customers and customers in disadvantaged communities (DACs).¹⁶
- **Energy Code Connect** — helps building departments and professionals comply and adjust to codes and standards updates, through regional forums and provision of resources and training. This program coordinates with local jurisdictions to develop electrification plans and engages with consultants and building professionals to advance these efforts.¹⁷
- **Building Performance Training** — supports workers with technical training and soft skills training, as well as high-performance building certifications, with a focus on serving disadvantaged workers.¹⁸
- **Energy Assurance Services** — offers technical support, including audits and benchmarking, to achieve comprehensive load management, energy savings, and resilience opportunities to public agencies and businesses.¹⁹
- **Single-Family Home Energy Savings** — delivers energy upgrades to HTR, DAC and underserved single-family households utilizing a network of EE aggregators, with incentives paid based on metered savings achieved.²⁰
- **Multifamily Home Energy Savings** — provides no-cost site assessments, technical assistance, and incentives paid directly to property owners and managers, subject to the requirement that the project scope includes three or more upgrades, a percentage of which

¹⁶ *Id.* at Chapter 3, p. 36.

¹⁷ *Id.* at Chapter 3, pp. 36-37.

¹⁸ *Id.* at Chapter 3, p. 37.

¹⁹ *Id.* at Chapter 3, p. 37.

²⁰ *Id.* at Chapter 3, pp. 37-38.

must directly benefit tenants, that achieve a minimum greenhouse gas (GHG) savings per apartment.²¹

REN Program ²²	Market Segment	REN Activity			Existing or New	Four Year Budget 2028-2031	Eight Year Budget 2028-2035
		Gap Filling	Pilot	HTR			
Resource Acquisition							
n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Market Support							
Agriculture Energy Solutions	Agricultural	X		X	Existing	2,180,577	4,740,454
Building Performance Training	Cross Cutting	X		X	Existing	10,697,056	23,047,157
Energy Assurance Services (EAS)	Cross Cutting	X		X	Existing	2,148,143	4,646,398
Equity							
Single-Family Home Energy Savings	Residential	X		X	Existing	32,869,835	71,681,894
Multifamily Home Energy Savings	Residential	X		X	Existing	22,764,791	49,584,976
Commercial Energy Savings	Commercial	X		X	Existing	12,802,680	27,864,889
Codes and Standards							
Energy Code Connect	Cross Cutting	X			Existing	7,882,131	17,081,530
Total							
7 Programs	4 Market Segments				7 Existing 0 New	91,345,212	198,647,298

²¹ *Id.* at Chapter 3, p. 38.

²² Table does not include all 3C-REN programs, notably its IDSM, Portfolio Support, and EM&V activities. In total, 3C-REN's 4-year budget request for the 2028-2031 cycle is \$104,669,62.55, and the total 8-year budget request for the 2028-2035 cycle is \$227,688,506.

C. Overview of Testimony

The testimony supporting this Application is set forth in Exhibit TCR-01: 3C-REN 2028-2031 Portfolio Plan and 2028-2035 Business Plan. Exhibit TCR-01 is structured as follows:

Chapter 1: Executive Summary provides a high-level overview of 3C-REN's Application, its guiding principles, and the regulatory context upon which it relies.

Chapter 2: Portfolio Summary describes 3C-REN's governance structure, service territory, and the factors unique to the Tri-County region that influenced portfolio development. In addition, Chapter 2 sets forth 3C-REN's Application Summary Tables.

Chapter 3: Portfolio Strategies provides details on the underlying goals driving 3C-REN's portfolio, an overview of programs, and a description of 3C-REN's strategies to support a number of Commission-driven policy objectives. Chapter 3 further addresses 3C-REN's strategies to overcome sector- and segment-level challenges.

Chapter 4: Forecast Methodology and Zero-Based Budgeting explains the process by which 3C-REN developed its proposed budgets, which is grounded in the Commission's zero-based budgeting requirements.

Chapter 5: Portfolio Management sets forth the key metrics and outcomes for 3C-REN's portfolio over the four- and eight-year periods. On a more granular level, Chapter 5 provides a description of the Unique Value Metrics applicable to 3C-REN, as well as specific strategies to optimize Total System Benefit (TSB) and cost-effectiveness, risk management, and procurement practices.

Chapter 6: Segmentation and Sector Strategy outlines 3C-REN's approach to portfolio segmentation and sector strategies. Chapter 6 discusses the particular ways in which 3C-REN's proposed portfolio serves the various segment objectives and sub-objectives.

Chapter 7: Portfolio Coordination describes 3C-REN's internal and external coordination activities, including specific, structured processes for coordination among overlapping PAs to prevent duplication.

Chapter 8: Stakeholder Engagement provides a description of the comprehensive processes by which 3C-REN engaged local communities to inform this Application.

Chapter 9: Evaluation, Measurement, and Verification details 3C-REN's planned EM&V activities, including 3C-REN-specific studies tailored to provide meaningful insight into portfolio performance.

Chapter 10: Cost Recovery is not applicable, IOU only.

Chapter 11: Recommendations for New or Modified EE Policy proposes seven modifications to the Commission's existing EE policy.

III. THE COMMISSION SHOULD APPROVE 3C-REN'S PROPOSED PORTFOLIO.

3C-REN's proposed portfolio was thoughtfully designed to advance statewide, Commission, and local policy objectives, while simultaneously aligning with Commission precedent and REN requirements. 3C-REN respectfully requests that the Commission approve its proposed portfolio as a balanced, reasonable means to fill gaps in the Tri-County Region, advance statewide decarbonization goals, and deliver equitable EE programming to local communities.

A. The 3C-REN Portfolio is Tailored to Advance Statewide and Commission Policy Objectives and Deliver Meaningful Value to Customers.

At its foundation, 3C-REN's proposed portfolio is driven by California's goals of doubling EE in existing buildings by 2030,²³ reducing emissions from existing buildings at least 40 percent

²³ The 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.

below 1990 levels by 2030,²⁴ achieving 100 percent renewable and zero-carbon retail electricity,²⁵ and becoming entirely carbon neutral by 2045.²⁶ The proposed portfolio is further guided by the State's focus on identifying and addressing barriers to advancing EE and decarbonization in low-income and disadvantaged communities,²⁷ as well as the Commission's Environmental and Social Justice Action Plan (ESJ Action Plan).²⁸ Finally, 3C-REN's proposed portfolio centers affordability and ratepayer value, consistent with Governor Newsom's October 30, 2024, Executive Order N-5-24.²⁹

To advance these objectives, 3C-REN's portfolio places an emphasis on building decarbonization, lending particular attention to the unique characteristics of the region, which include aging infrastructure stock and a high proportion of households that utilize gas furnaces and water heaters.³⁰ 3C-REN's portfolio leverages an integrated program design to efficiently and effectively advance decarbonization efforts, aligning electrification, EE, and load flexibility.³¹ 3C-REN's portfolio further supports affordability objectives, delivering high-impact, targeted services that lower bills, remove participation barriers, and address gaps – particularly in disadvantaged,

²⁴ Assembly 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.

²⁵ Senate 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.

²⁶ In September 2018, former Governor Jerry Brown issued Executive Order B-55-18 to achieve carbon neutrality statewide by no later than 2045.

²⁷ See, e.g., SB 350 and SB 1477.

²⁸ CPUC Environmental & Social Justice Action Plan, Version 2.0 Draft (ESJ Action Plan), accessible at <https://www.cpuc.ca.gov/news-and-updates/newsroom/environmental-and-social-justice-action-plan>.

²⁹ California Executive Order N-5-024 (Oct. 30, 2024) (directing the Commission to place an emphasis on affordability and ratepayer value while balancing the State's decarbonization goals), accessible at: <https://www.gov.ca.gov/wp-content/uploads/2024/10/energy-EO-10-30-24.pdf>.

³⁰ Exh. TCR-01 at Chapter 3, p. 44.

³¹ *Id.*

underserved, and HTR communities.³² Importantly, 3C-REN's proposed portfolio balances affordability for nonparticipating customers through achievement of peak electric savings, which lower electricity costs for participating and nonparticipating customers alike.³³

B. 3C-REN is an Established Portfolio Administrator.

3C-REN has been successfully operating EE programs since 2019. Since that time, 3C-REN's portfolio of programs has gained significant momentum and has delivered tangible benefits to local communities. In 2024 alone, 3C-REN's seven programs achieved the following outcomes:

- **Home Energy Savings for Single Family Homes:** completed 516 projects, with electrification projects comprising 67% of projects completed. In 2024, this program achieved –1,047,444 net kWh savings and 134,744 net therm savings.³⁴
- **Home Energy Savings for Multifamily Properties:** completed 13 projects, serving 1,319 units and providing \$1,642,406 in rebates. This program achieved significant energy savings, including –227,306.64 net kWh, 12.79 net kW, 69,719.97 net therms.³⁵
- **Commercial Energy Savings:** enrolled nine aggregators within the first three months of operation.³⁶
- **Energy Code Connect:** held 25 training events, reaching 347 attendees. Further, the Energy Code Coach offered technical assistance for 142 cases.³⁷

³² Exh. TCR-01 at Chapter 3, pp. 35-36.

³³ *Id.* at Chapter 3, p. 49.

³⁴ 3C-REN 2024 Annual Report, p. 6 (negative numbers reflect fuel substitution in electrification projects).

³⁵ *Id.* (negative numbers reflect fuel substitution in electrification projects).

³⁶ *Id.*

³⁷ *Id.*

- **Building Performance Training:** held 115 events on topics such as high-performance enclosures and electrification, reaching 2,091 workers and students, as well as 27 green career educational sessions for students.³⁸
- **Energy Assurance Services:** enrolled a local police station and church, and partnered with the Community Environmental Council to identify “Resilience Hubs” in the region.³⁹
- **Agricultural Energy Solutions:** fully launched in 2024, conducting targeted outreach to local farmers and offering utility bill review, site assessments, and benchmarking.⁴⁰

During this portfolio period, 3C-REN will build upon these successes and leverage lessons learned to improve portfolio performance and continue delivering meaningful bill savings, energy savings, and GHG reductions to the Tri-County Region.

C. The 3C-REN Portfolio Complies with the Commission’s Overall EE Framework, as well as the REN Criteria.

1. This Application is Consistent with the Commission’s Rolling Portfolio Requirements.

The Commission first created the “rolling portfolio” approach in D.16-08-019. The Commission has since refined the rolling portfolio process, directing EE PAs to submit four-year Portfolio Plans and eight-year Business Plans on a rolling basis, beginning in February of 2022.⁴¹ With regard to the instant Application, the Commission granted all PAs a filing extension on December 15, 2025, which directed that business portfolio applications be filed by March 16,

³⁸

Id.

³⁹

Id.

⁴⁰

Id.

⁴¹

D.21-05-031 at OP 5.

2026.⁴² 3C-REN's Application complies with these timing requirements and includes a 2028-2031 Portfolio Plan and 2028-2035 Business Plan for the Commission's evaluation.

2. 3C-REN's Proposed Portfolio is Consistent with the Commission's REN Framework.

RENs began as a regional pilot concept, first authorized in D.12-11-015.⁴³ In D.18-05-041, the Commission expanded upon the initial pilot concept, authorizing three REN portfolio administrators, including 3C-REN.⁴⁴ To date, the Commission has authorized a total of six REN portfolio administrators.⁴⁵ Recognizing the integral role of RENs as EE PAs, the Commission has explained that:

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.⁴⁶

A key element that differentiates RENs from their investor-owned utility (IOU) or community choice aggregator (CCA) PA counterparts is that RENs are constrained in which programs they are allowed to offer. Generally, RENs must demonstrate new or unique value to the Commission's energy, climate, and/or equity goals.⁴⁷ On a more granular level, the Commission may only approve new or renewed REN business plans that comply with the following criteria:

⁴² Letter from Commission Executive Director Rachel Peterson, Re: Request for Extension of Time to Comply with Decision 21-05-031 Ordering Paragraph 5 and Ordering Paragraph 2 of D.23-06-055 (Dec. 15, 2025).

⁴³ Southern California Regional Energy Network and Bay Area Regional Energy Network. D.12-11-015, authorizing funding for program years 2013-2014.

⁴⁴ D.18-05-041 at 2. BayREN, SoCalREN, and 3C-REN.

⁴⁵ D.23-06-055; D.24-08-003.

⁴⁶ D.19-12-021 at 17. This Decision also required that any new REN "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." *Id.* at 2.

⁴⁷ *Id.*

- 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.⁴⁸

While limited in scope, RENs serve as a key component within the Commission’s EE framework. The Commission has consistently acknowledged the importance of the REN role, finding that “[t]he 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.”⁴⁹

This role remains critical as energy unaffordability continues to impact vulnerable households, businesses, and communities. As an established PA, 3C-REN is situated well to leverage the unique REN qualities the Commission has previously acknowledged. 3C-REN has built trusting relationships with local communities and community partners, and has the benefit of lessons learned and community input to inform targeted refinements to its portfolio. Pursuant to the Commission’s REN criteria, the 3C-REN portfolio is designed to fill gaps in the region and serve HTR markets, prioritizing increased Equity customer participation by decreasing barriers to entry, as well as delivery of clear, tangible benefits in the form of bill savings, technical expertise, and workforce development.⁵⁰

⁴⁸ *Id.* 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 IOUs].” D.18-05-041 at 100. D.12-11-015 at 17.

⁴⁹ D.19-12-021 at 18.

⁵⁰ Exh. TCR-01 at Chapter 3, p. 30.

3. The 3C-REN Portfolio is Consistent with the Commission's Segmentation Guidance for RENs.

In D.21-05-031, the Commission directed PAs to segment their portfolios into the following three segments based on the primary program purpose:⁵¹

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

Market Support: Programs with a primary objective of supporting the long-term success of the energy efficiency market by educating customers, training contractors, building partnerships, or moving beneficial technologies towards greater cost-effectiveness.

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

The Commission subsequently identified **Codes and Standards** as a “fourth distinct segment,” which has the primary purposes of:⁵²

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

Within its segmentation framework, the Commission has imposed budgetary caps that limit IOUs' and CCAs' ability to serve the Market Support and Equity segments. Specifically, the

⁵¹ D.21-05-031 at 14-15.

⁵² D.23-06-055 at 13.

Commission has provided that “[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.”⁵³ In exempting RENs from this 30% budgetary cap, the Commission reasoned that “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.”⁵⁴

3C-REN's portfolio is segmented between Equity, Market Support, and Codes and Standards programming. 3C-REN's portfolio segmentation and strategies, which places an emphasis on Equity segment programs, closely align with its overarching portfolio goals.⁵⁵ In particular, 3C-REN's portfolio embeds equity as a foundational principle across the entire eight-year portfolio period through equity-focused program design, targeted outreach, and enhanced technical assistance to increase participation among HTR, underserved, and disadvantaged communities.⁵⁶ 3C-REN's Market Support strategy is designed to strengthen the long-term success of the regional EE market by building workforce capacity, expanding institutional expertise, and increasing access to high-quality technical assistance across residential, commercial, agricultural, and public sectors.⁵⁷ Finally, 3C-REN's Codes and Standards programming is designed to build

⁵³ D.21-05-031 at 2. Emphasis added.

⁵⁴ *Id.* at 23.

⁵⁵ Exh. TCR-01 at Chapter 7, p. 125.

⁵⁶ *Id.* at Chapter 7, pp. 141-142.

⁵⁷ *Id.* at Chapter 7, p. 126.

capacity among public agencies, private sector practitioners, and community partners to improve comprehension, enforcement, and application of California building codes and standards.⁵⁸

4. The 3C-REN Portfolio Provides Unique Value and Is Designed to Increase Cost-Effectiveness.

Due to RENs' unique and limited role as Commission-authorized PAs, the Commission has not imposed the same minimum cost-effectiveness threshold on RENs that 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.⁵⁹

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.”⁶⁰

More recently, the Commission has refined its portfolio cost-effectiveness requirements to align with segmentation guidance. For IOU and CCA PAs, the Resource Acquisition segment must achieve a Total Resource Costs (TRC) ratio of 1.0 or greater.⁶¹ In implementing this requirement, the Commission specifically declined to impose threshold cost-effectiveness requirements on REN PAs, noting that REN portfolios are subject to different rules.⁶² Notwithstanding, the Commission

⁵⁸ *Id.* at Chapter 7, p. 149.

⁵⁹ D.18-05-041 at 95.

⁶⁰ D.19-12-021 at 37.

⁶¹ D.21-05-031 at 22.

⁶² *Id.* Emphasis added.

has “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.”⁶³ The Commission does not impose threshold TRC requirements upon Market Support and Equity programs, and instead utilizes specific metrics and indicators to evaluate program performance.⁶⁴ Finally, the Commission evaluates portfolio performance

In accordance with the Commission’s prior guidance to REN PAs, 3C-REN has made concerted efforts through the development of its proposed portfolio to improve the cost-effectiveness of its incentive programs.⁶⁵ While not subject to threshold cost-effectiveness requirements, 3C-REN utilizes both Total System Benefit (TSB) goals and cost-effectiveness metrics as performance management tools to optimize portfolio performance while preserving the primary purposes of its segmented portfolio.⁶⁶ 3C-REN further leverages Equity and Market Support metrics and indicators⁶⁷ and Unique Value Metrics to capture dimensions of program performance that traditional cost-effectiveness metrics do not fully reflect.⁶⁸ These data points allow 3C-REN to optimize its portfolio to advance its core goals and maximize ratepayer value.

5. The 3C-REN Portfolio Complies with the Commission’s Guidance Regarding Overlap Among Portfolio Administrators.

The Commission has previously provided specific guidance for PAs that serve overlapping service areas:

[W]e expect programs offered by different PAs will not significantly overlap, except for programs intended to serve hard-to-reach customers. We maintain a preference for PAs to work collaboratively not only to minimize duplication in non-hard-to-reach customer populations but importantly to strive toward effective regional strategies and complementary program offerings; to be clear, PAs should

⁶³ D.19-12-021 at 37.

⁶⁴ Resolution E-5351 (Jun. 12, 2025).

⁶⁵ Exh. TCR-01 at Chapter 3, p. 38.

⁶⁶ *Id.* at Chapter 5, p. 102.

⁶⁷ *See* Resolution E-5351.

⁶⁸ Exh. TCR-01 at Chapter 5, p. 86.

communicate regularly in the course of administering their portfolios and preparing applications for future cycles; this regular communication is particularly important in light of the IOUs' solicitations, which could result in the launch of new programs at any time and potentially implicate existing programs offered by other PAs.⁶⁹

The Commission has further clarified that “[a]s long as program administrators and implementers are addressing different aspects of the energy efficiency marketplace, and/or coordinating their efforts in the same geographic area, some overlap may be fine or even positive, especially if the individual entities coordinate their offerings and their outreach to customers.”⁷⁰ Accordingly, the Commission has set forth specific Joint Cooperation Memorandum requirements for PAs with overlapping service areas, which serve to identify potential overlap and detail risk mitigation processes.⁷¹

Consistent with the Commission's JCM requirements, 3C-REN has engaged in two JCMs encompassing all PAs with which it overlaps. 3C-REN leads the Central Coast JCM, which consists of 3C-REN, Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas), and Pacific Gas and Electric Company (PG&E).⁷² In addition, 3C-REN participates in the Southern California JCM, which includes 3C-REN, the Southern California Regional Energy Network (SoCalREN), SCE, SoCalGas, and the Inland Regional Energy Network (I-REN).⁷³

Beyond biannual JCM coordination, 3C-REN coordinates regularly with all PAs in its territory to support portfolio alignment, reduce customer confusion, and mitigate double dipping.⁷⁴ This coordination includes ongoing participation in Portfolio Administrator Sector Coordination

⁶⁹ D.23-06-055 at 89-90.

⁷⁰ D.19-12-021 at 25.

⁷¹ See D.18-05-041 at 122-123, OP 38; *see also* D.23-06-055 at OP 35.

⁷² Exh. TCR-01 at Chapter 7, p. 159.

⁷³ *Id.* (while 3C-REN and I-REN do not overlap, both 3C-REN and I-REN overlap with SoCalREN and therefore participate in the same JCM Process).

⁷⁴ *Id.* at Chapter 7, p. 158.

(PASC) meetings within the Southern California JCM,⁷⁵ which have proven successful in resolving identified risks of potential duplication.⁷⁶ 3C-REN also participates in quarterly meetings with PG&E, wherein 3C-REN and PG&E program teams coordinate across all sectors.⁷⁷ 3C-REN and PG&E's multifamily program teams also meet quarterly to coordinate across the EE portfolios and PG&E's Energy Savings Assistance programs.⁷⁸ Finally, 3C-REN conducts regular coordination with administrators of complementary regional programs to stack incentives and maximize value.⁷⁹

IV. THE COMMISSION SHOULD APPROVE 3C-REN'S PROPOSED BUDGETS.

For the initial four-year period, 3C-REN's proposed budget of \$104,669,626 reflects a measured increase of 3C-REN's 2024-2027 approved budget of \$71,367,489.⁸⁰ This increase reflects the sustained momentum behind 3C-REN's existing portfolio, and was carefully developed to support 3C-REN's 2028-2031 portfolio objectives of expanding access and reducing barriers, increasing documentation on data-driven accountability, delivery of clear, communicable benefits, and integration across the portfolio.⁸¹ Over the 2032-2035 horizon, 3C-REN forecasts a budget of \$123,018,880, which is intended to support sustained program growth and address changing market conditions. These proposed budgets are reasonable and grounded in Commission guidance.

In D.19-12-021, the Commission explained that “REN 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

⁷⁵ *Id.* at Chapter 7, pp. 159-160.

⁷⁶ *Id.* at Chapter 7, p. 168.

⁷⁷ *Id.* at Chapter 7, p. 162.

⁷⁸ *Id.*

⁷⁹ *Id.* at Chapter 7, pp. 162-165.

⁸⁰ See 3C-REN Advice Letter 14-E/13-G: 2024-2027 Energy Efficiency Mid-Cycle Advice Letter, p. 14, Table 2.3a (Nov. 4, 2025).

⁸¹ Exh. TCR-01 at Chapter 3, pp. 30-31.

customers.”⁸² In accordance with this guidance, 3C-REN evaluated the overall scale of its proposed portfolio relative to IOU energy efficiency investments in the tri-county region. This evaluation considered:⁸³

- The number of customers located within Ventura, Santa Barbara, and San Luis Obispo Counties;
- The share of IOU non-statewide and non-regional EE expenditures attributable to the same geographic footprint; and
- 3C-REN’s statutory and Commission-directed focus on HTR, disadvantaged (DAC), and underserved customers.

3C-REN’s proposed budget and savings forecasts are further grounded in demonstrated program performance, consistent with Commission direction to RENs, and structured to advance statewide priorities including affordability, equity and building decarbonization. 3C-REN has more than seven years of experience forecasting energy efficiency program and portfolio budgets and savings as a REN PA. Rather than introduce new program structures that could create administrative burden, performance risk, or additional ratepayer exposure, 3C-REN intentionally elected to maintain and enhance its existing portfolio framework for the 2028–2031 period. This approach supports ratepayer protection and affordability by building upon programs with established trends, documented uptake, and refined implementation systems.

Because the proposed portfolio largely continues existing programs, the proposed 2028–2031 budget and savings forecast are grounded in multiple years of actual cost and benefit data. Since approval of 3C-REN’s current portfolio in D.23-06-055, 3C-REN has refined its data

⁸² D.19-12-021 at 39.

⁸³ See Exh. TCR-01 at Chapter 4.

collection instruments, contractor reporting requirements, and program tracking databases so that portfolio leadership have direct access to both quantitative and qualitative data and qualitative feedback, enabling forecasts that reflect real participation patterns, equity-driven outreach realities and on-the-ground market conditions.

3C-REN's resource programs have undergone several reforecasting exercises, including through the 2023 True-Up Advice Letter (TUAL), the 2025 Mid-Cycle Advice Letter (MCAL) and this application. These iterative updates incorporated stakeholder feedback, evolving market conditions, updates to deemed workpapers, changes in leveraged funding availability, and observed participation shifts. Through this process, 3C-REN has strengthened its understanding of the drivers affecting incentive utilization, TSB ratios and other key indicators of program performance.

Pursuant to Commission guidance, 3C-REN budgeted for the upcoming portfolio cycle using a bottom-up, zero-based budgeting approach. The process began with a review of historical program performance and future portfolio objectives to inform future program activities. The Tri-Counties then evaluated their current staffing levels and identified future program needs. After establishing staffing plans, each individual program team planned their expenses for each year of the portfolio cycle based on experience and prior spending, which were then adjusted for future program activities. This exercise included the evaluation of incentive budgets and their current expenditure rates, additional regulatory requirements, continued program growth, plans for future outreach and events, and other program implementation activities. In sum, all cost categories for each program were examined and forecasted based on the Tri-Counties' best-available cost assumptions. From there, they were evaluated and, in some cases, refined to better align with 3C-REN's portfolio goals. Adjustments were made to better optimize the portfolio for the achievement

of savings and performance goals. Once all individual program budgets were finalized, they were consolidated to create the full portfolio budget.

As a whole, 3C-REN's comprehensive budget forecasting process leverages its historical experience, Commission guidance, and key objectives for the portfolio period to arrive at a reasonable budget proposal. Accordingly, 3C-REN respectfully requests that the Commission approve its 2028-2031 Portfolio Plan and 2032-2035 Business Plan budgets.

V. REQUEST FOR CONTINUED AUTHORIZATION FOR SOUTHERN CALIFORNIA GAS COMPANY, SOUTHERN CALIFORNIA EDISON COMPANY, AND PACIFIC GAS AND ELECTRIC COMPANY TO COLLECT REVENUE AND DISBURSE FUNDS.

Under the Commission's EE framework, each IOUs' role is limited to that of revenue collection and disbursement of funds to RENs. The Commission explained in D.23-06-055 that:

The IOU role as a fiscal agent for the CCAs and RENs operating within its territory should be limited to collecting and disbursing funds under the direction of the Commission and should not include a compliance and monitoring function.⁸⁴

3C-REN continues to have a strong working relationship with SoCalGas, SCE and PG&E, and respectfully requests that the Commission to continue to authorize the collections and disbursement of funds from Southern California Gas Company (SoCalGas), Southern California Edison Company (SCE) and Pacific Gas and Electric Company (PG&E) to 3C-REN.

VI. POLICY RECOMMENDATIONS

In developing its 2028-2031 Portfolio Plan and 2032-2035 Business Plan, 3C-REN identified several key modifications to the Commission's EE policies aimed to better align forecasted savings with on-the-ground realities, incorporate equity principles into cost-effectiveness analyses, and expand access to EE across a broader base of Equity customers. 3C-REN's specific policy recommendations are set forth in Exhibit TCR-01, Chapter 11.

⁸⁴ D.23-06-055 at 112, Conclusion of Law 13.

VII. COMPLIANCE WITH THE RULES OF PRACTICE AND PROCEDURE

A. Commission Authority for Filing the Application – Rule 2.1

3C-REN files this Application in accordance with D.21-05-031, Ordering Paragraph 5, and Ordering Paragraph 2 of D.23-06-055, Ordering Paragraph 2, which directed all energy efficiency PAs to file energy efficiency business plan and portfolio applications every four years by February 15, beginning in 2022.⁸⁵ The Commission granted an extension to 3C-REN and all other PAs for this cycle of applications, allowing applications to be filed no later than March 16, 2026.⁸⁶

B. Proposed Scope

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

- Whether the 3C-REN Strategic Business Plan and Portfolio Plan are reasonable and comply with Commission guidance for REN portfolios.
- Whether the proposed programs, goals, estimated budget, and metrics are reasonable.
- Whether the Commission should direct SoCalGas, SCE, and PG&E to continue collecting and distributing funds to 3C-REN.
- Whether the Commission should adopt 3C-REN's policy recommendations.

C. Request for Relief – Rule 2.1

3C-REN requests that the Commission:

- Find that 3C-REN's Strategic Business Plan and Portfolio Plan are reasonable and comply with Commission precedent;

⁸⁵ D.21-04-031 at 81-82, Ordering Paragraph 5.

⁸⁶ *Letter from Commission Executive Director Rachel Peterson, Re: Request for Extension of Time to Comply with Decision 21-05-031 Ordering Paragraph 5 and Ordering Paragraph 2 of D.23-06-055* (Dec. 15, 2025).

- Find that 3C-REN’s Strategic Business Plans and Portfolio Plans proposed goals, estimated budget, and metrics are reasonable;
- Approve 3C-REN’s Strategic Business Plan, Portfolio Plan, and budget;
- Direct SoCalGas, SCE and PG&E to continue to collect and distribute funds accordingly to 3C-REN; and
- Adopt 3C-REN's policy recommendations.

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

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

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:

Sheridan Pauker
 Nathan Carrier
 Keyes & Fox LLP
 580 California Street, 12th Floor
 San Francisco, CA 94104
 Telephone: (510) 314-8202
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Alejandra Tellez
 Deputy Executive Officer
 County Executive Office
 County of Ventura
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 Ventura, CA 93009
 Telephone: (805) 654-3835
 E-mail: alejandra.tellez@venturacounty.gov

*Counsel for the County of Ventura on
 Behalf of the Tri-County Regional Energy
 Network*

F. 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). IOU EE applications meet the definition of “ratesetting” in Rule 1.3(e) because

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

G. 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 and has developed the schedule set forth below to develop a full record without the need for hearings. Should the need for hearings arise, 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 2028.

H. Proposed Schedule – Rule 2.1(c)

3C-REN proposes the below schedule for consideration of its Application. To support efficient administration of this multi-party proceeding, 3C-REN encourages the Commission to consolidate all PA Applications and set a common date for Protests and Responses so that intervenors need only submit one Protest or Response. Further, 3C-REN recommends that the Commission solicit intervenor policy recommendations and issue a determination on which policy recommendations will be in scope early in the proceeding. 3C-REN does not believe hearings will be necessary; however, if hearings are held, hearings should be limited to PA programs and budgets, not policy matters which are better suited for comments or briefing.

Activity	Proposed Schedule
Application Due Date	March 16, 2026
ALJ Ruling Consolidating Proceeding and Setting Dates for Protests and Replies	March 31, 2026
Protests Due	April 21, 2026
Reply to Protests	May 1, 2026
Joint Prehearing Conference Statement	May 20, 2026
Prehearing Conference	May 27, 2026
Scoping Memo Setting Schedule and Soliciting Policy Recommendations and Comments	June 10, 2026
Intervenor Policy Recommendations	July 15, 2026
Opening Comments on PA and Intervenor Policy Recommendations	July 29, 2026
Reply Comments on Policy Recommendations	August 12, 2026
Second Scoping Memo [Determining Whether Policy Recommendations Are in Scope]	September 16, 2026
Intervenor Direct Testimony on Programs and Budgets	September 30, 2026
Rebuttal Testimony on Programs and Budgets	October 21, 2026
Opening Briefs	November 18, 2026
Reply Briefs (Matter Submitted)	December 16, 2026
Proposed Decision	February 2027
Final Decision	March 2027

I. Safety – Rule 2.1(c)

In D.16-01-017, the Commission adopted an amendment to Rule 2.1(c) requiring Applications to clearly state “relevant safety considerations.” This Application does not raise any safety issues because it is limited to seeking Commission approval of 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.

J. Articles of Incorporation – Rule 2.2

The County of Ventura is a California county created pursuant to 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 is a County of Ventura program.

K. Authority to Increase Rates Not Applicable – Rule 3.2

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 PG&E, SoCalGas, and SCE is allocated to 3C-REN.

L. Notice and Service of Application

A copy of this Application and Notice of Availability of supporting testimony are being served on the parties of record in R.13-11-005, R.25-04-010 and A.22-02-005, *et al.* and Chief Administrative Law Judge Michelle Cooke.

M. List of Supporting Documents

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 TCR-01	2028-2031 Portfolio Plan and 2028-2035 Business Plan Testimony
Exhibit TCR-02	Program Cards
Exhibit TCR-03	CEDARS Filing Links and Receipts
Exhibit TCR-04	Testimony Appendices
Application Tables	

VIII. CONCLUSION

3C-REN appreciates the Commission's consideration of this Application and for the continued opportunity to serve communities throughout the Tri-County Region with these critical and transformative programs. 3C-REN respectfully requests the Commission expeditiously approve this Application.

Respectfully submitted,

/s/ Sheridan Pauker

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Counsel for the County of Ventura on behalf of the Tri-County Regional Energy Network

March 16, 2026

APPENDIX A VERIFICATION

I am an officer of the applicant County of Ventura herein, 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 13, 2026, at Ventura, California.

/s/ Alejandra Tellez
Alejandra Tellez
Deputy Executive Officer
County Executive Office
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