TRI-COUNTY REGIONAL ENERGY NETWORK

2028-2031 PORTFOLIO PLAN AND 2028-2035 BUSINESS PLAN

APPENDICES

EXHIBIT 4

APPENDIX A

STATEMENT OF QUALIFICATIONS

STATEMENT OF QUALIFICATIONS OF NANCY BARBA

PORTFOLIO OVERVIEW, ENERGY SAVINGS FORECAST AND TECHNICAL CONSULTANT

1075 Serpentine Lane, Suite B, Pleasanton, CA 94566-4809

Description of Responsibilities

I am a Portfolio Director with Frontier Energy, responsible for designing and developing portfolios and programs for regional energy networks and community choice aggregators. The work includes strategic planning, creating sector frameworks, identifying goals and energy savings forecasting. Additionally, my team provides strategic funding consulting to local governments and aids in securing funding opportunities from ratepayer and non-ratepayer sources. As part of my responsibilities, I manage programs, oversee stakeholder engagement, develop program pipelines, ensure accurate regulatory reporting and advise on community outreach.

I oversee development of cost effectiveness calculations and the populating of regulatory reporting tables, and ensure technical guidance is current and appropriate for the proposed sectors and segments.

For the Tri-County Regional Energy Network I oversee and consult on portfolio strategic framework, program design, development activities, budgets, metrics, and energy savings estimates. I advise on regulatory matters, including proceedings, support California Energy Efficiency Coordinating Committee (CAEECC) interactions, filing comments, and support negotiating the regulatory landscape.

I consult on program design, including measure selection and strategic customer engagement for workforce education and training, codes and standards, public sector, single family, and multifamily programs. I have supported dozens of successful filings of annual budget advice letters, program implementation plans, joint cooperation memorandums, and other required regulatory documents for program administrators.

Summary of educational and professional background

I have been with Frontier Energy since 2010. Previously, I was the Director, Sustainable Works, Residential Green Programs for the City of Santa Monica.

I earned a Bachelor of Science from California State University, Long Beach.

I am a LEED, Accredited Professional, a Certified Green Building Professional and a Certified GreenPoint Advisor.

STATEMENT OF QUALIFICATIONS OF VICTOR ESTEBAN BRIONES

AGRICULTURE SECTOR

646 County Square Drive, Ventura, CA 93003

Description of responsibilities

I am a Program Administrator with the County of Ventura CEO Sustainability Division. In addition to supporting countywide sustainability and climate-related work, I serve as the Agriculture Energy Solutions (AES) Program Lead for the Tri-County Regional Energy Network (3C-REN). In this role, I oversee delivery of the program's no-cost technical assistance services offered to agricultural producers in San Luis Obispo, Santa Barbara, and Ventura counties. As program lead, I coordinate the AES program's core components, including utility bill analysis, facility energy assessments, benchmarking support, and identification of energy-saving opportunities for growers and agricultural operators in our region. I facilitate intake and enrollment, manage communication with participants, and ensure high-quality service delivery from our implementation partner who conducts the technical assessments. I also support growers in navigating incentive pathways that may support equipment upgrades or efficiency improvements. In this capacity, I help connect agricultural operations to available resources, promote energy savings, and strengthen the region's agricultural energy resilience.

Summary of educational and professional background

I have served as Program Administrator with the County of Ventura since 2023, supporting program planning, stakeholder engagement, and implementation of sustainability initiatives. Previously, I worked as an Air Quality Specialist with the Ventura County Air Pollution Control District, where I reviewed agricultural equipment replacement applications, conducted field inspections, and administered incentive programs such as the Carl Moyer, Community Air Protection (CAP), and Funding Agricultural Replacement Measures for Emission Reductions (FARMER) programs. I also worked as a Natural Resource Coordinator with the Colusa County Resource Conservation District (CCRCD), providing technical assistance for U.S. Department of Agriculture (USDA) conservation practices and conducting field inspections and resource inventories.

Bachelor of Arts in Environmental Studies, University of California, Santa Barbara, 2020

(In Progress) Master of Public Administration, California State University, Northridge, Expected Graduation – Fall 2026

STATEMENT OF QUALIFICATIONS OF ERICA HELSON

PORTFOLIO OVERVIEW

800 S Victoria Avenue, Ventura, California 93009

Description of responsibilities

I am a Portfolio Manager for 3C-REN with the County of Ventura. In this role, I support REN-wide and programmatic strategic planning, organizational process improvements, data collection and management of associated software platforms, metrics development and reporting, marketing and branding, regulatory compliance and staff engagement.

Joining 3C-REN in the first year of program delivery in 2019, I helped to establish clear program goals, created protocols to ensure collection of key program data for metrics reporting and program evaluation, managed the development of a REN-wide marketing strategy, participated in California Energy Efficiency Coordinating Committee (CAEECC) meetings and working groups, and facilitated routine team check-ins to promote cross-program coordination. Much of this work is ongoing, with a focus on marketing strategy implementation and management of 3C-REN's database.

Summary of educational and professional background

I have been with the County of Ventura since August of 2019.

Prior to that, I was an Assistant Vice President with the NYC Economic Development Corporation, where I developed and implemented sustainability and resiliency programs, with sub-sectors of focus that included energy efficiency, solar, and offshore wind.

Additional past experience includes outreach for commercial energy efficiency programs with Steven Winter Associates, development of solar soft cost reduction strategies for City University of New York, and marketing and project management for Solar Forward.

I have a Bachelor of Arts in Political Studies from Pitzer College (2008), and a Master of Public Administration in Environmental Science and Policy from Columbia University (2014).

STATEMENT OF QUALIFICATIONS OF SARA HUSKEY

CROSSCUTTING, COMMERCIAL, and RESIDENTIAL SECTORS

County of San Luis Obispo, PLANNING AND BUILDING DEPARTMENT: 976 Osos Street, Room 310, San Luis Obispo, CA 93408.

Description of responsibilities

I am an Energy Program Manager with the County of San Luis Obispo where I work with internal and external stakeholders to foster energy related policy, programs and projects for the County and Tri County Regional Energy Network (3C-REN). I am also a co-Director with 3C-REN, in which I am responsible for strategizing portfolio-wide operations; setting REN goals and values; establishing and managing portfolio-wide budgets; and addressing and resolving programmatic matters such as program design, marketing, procurement, and consultant support. Along with my co-Directors, who make up the 3C-REN Leadership team, I am responsible for making decisions that affect staff and program initiatives and develop strategies to promote a unified and positive working culture across our three counties. I also support the Portfolio Manager with running reports and analysis for regulatory and portfolio-wide metrics, indicators, and unique value metrics for annual reporting and managing the 3C-REN CRM, Salesforce.

In my role with the County of San Luis Obispo, I am also on the REN Leadership team where I provide 3C-REN updates to the Planning and Building Director and other REN staff. I supervise the 3C-REN Codes and Standards Program Manager where I provide historical knowledge and expertise on program design and implementation, train in program related tasks, and provide feedback and direction as needed. I am also currently the interim commercial Program Manager and support the residential program on contractor engagement, project enrollment, incentive and program budgets, contracts, and data management. Lastly, I support the workforce program on event management, outreach plans, and data analysis.

Summary of educational and professional background

I joined the County of San Luis Obispo in 2022 to administer the 3C-REN Codes and Standards program and transitioned to a supervisory role in 2024. I have nearly seven years of energy related experience in renewables and efficiency.

Prior to joining the County, I worked for REC Solar, a commercial solar company focused on developing, financing, and operating solar and storage projects. I started as a Senior Project Administrator where I supported Project Managers with contract management, subcontractor onboarding, project milestone documentation, and project financing, scheduling, and reporting. I was promoted to a Renewables Interconnection Specialist where I executed the interconnection approval process and coordinated with project team members, utilities, and other stakeholders to ensure accurate and timely submission and approval of applications to achieve permission to operate. I also managed and processed battery energy storage applications and incentive rebate programs.

Master of Public Policy, Environmental Policy, Cal Poly San Luis Obispo, 2018.

Bachelor of Science, Business Administration and Management, San Diego State University, 2007.

STATEMENT OF QUALIFICATIONS OF AARON JONES

2028-2031 Portfolio Plan and 2032-2035 Business Plan

1075 Serpentine Lane, Suite B, Pleasanton, CA 94566-4809

Description of responsibilities

I am a Program Consultant with Frontier Energy, Inc., which provides technical and regulatory consulting services to Tri-County Regional Energy Network (3C-REN). In this role, I led Frontier Energy's contributions to the Business Plan Application exhibit documents, including the Strategic Business and Portfolio plan, Program Cards and Appendixes. This work includes portfolio, segment, and sector strategies for 3C-REN's portfolio.

I also led Frontier Energy's contributions to 3C-REN's Mid-Cycle Advice Letter (MCAL) filing in 2025 as well as various ordering paragraph advice letters.

Summary of educational and professional background

I have been with Frontier Energy since 2023.

Prior to that, I was an ESG Associate at Cirrus Logic, a fabless semiconductor company, where I led ESG reporting, sustainability disclosures, and ESG investor ratings. Additional past experience includes sustainability consulting for real estate investment trusts and commercial property management companies on GRESB (Global Real Estate Sustainability Benchmark) disclosures.
Bachelor of Arts, Earth Science, Vassar College, May 2017.

STATEMENT OF QUALIFICATIONS OF LORI LA RIVA

RESIDENTIAL SECTOR

123 East Anapamu Street, Second Floor, Santa Barbara, CA 93101

Description of responsibilities

I am an Energy Program Manager with the County of Santa Barbara. In this position, I conduct Santa Barbara County specific work but also serve as a Tri-County Regional Energy Network (3C-REN) employee.

In my work with 3C-REN relevant to this filing, I am the program manager for the multifamily program, managing the program strategy and design, implementer, and budget for the whole-building-based program that targets hard-to-reach multifamily (5+ units) buildings for greenhouse gas savings. I also coordinated residential education and outreach for the 3C-REN single family program.

Summary of educational and professional background

I have been with the County of Santa Barbara since 2023. I initially worked as an Energy Program Specialist responsible for education and outreach for the 3C-REN Single Family Home Energy Savings program and the County's resident-facing climate resilience campaign as well as the County's internal employee Clean Commute program. I am currently an Energy Program Manager and lead the 3C-REN Multifamily Home Energy Savings program. I also lead review of Energy Conservation Plans submitted by cannabis business license applicants at the County of Santa Barbara, which includes verifying that energy reduction requirements are met for indoor and mixed-light cannabis cultivators.

Prior to that, I worked for the Santa Barbara County Association of Governments from 2008 to 2022 in the field of Transportation Demand Management, as program coordinator and division lead, to reduce vehicle-miles-traveled and greenhouse gas emissions in the County of Santa Barbara. I developed and administered budgets, managed programs and grants, collaborated on program development and implementation with private businesses, non-profits, and government agencies, and coordinated resident- and business-facing marketing, education and outreach campaigns.

Bachelor of Arts in Environmental Studies, University of California, Santa Barbara.

STATEMENT OF QUALIFICATIONS OF ALEJANDRA TÉLLEZ

PORTFOLIO OVERVIEW AND STRATEGY

800 South Victoria Avenue, Ventura CA 93001

Description of responsibilities

I am the Sustainability Officer for the County of Ventura. In that role I have served as 3C-REN's administrative lead since it was launched in 2019. I am one of the directors responsible for oversight of 3C-REN's portfolio of energy efficiency programs, preparation of regulatory filings, and supervision of development and implementation of reporting and compliance, evaluation, verification and measurement activities and collaborations with Southern California Gas Company, Southern California Edison Company, and Pacific Gas and Electric Company. I have been a California Energy Efficiency Coordinating Committee (CAEECC) member since 3C-REN was approved.

I oversee the Sustainability Division for the County of Ventura, which supports the Board of Supervisor's commitment to reducing greenhouse gas emissions as well as efforts to improve environmental performance. I am the chair of the Ventura County Sustainability Committee, whose purpose is to promote environmental stewardship in County operations. The committee considers the impacts on sustainability associated with County practices, evaluates sustainability initiatives qualitatively and quantitatively, promotes sustainability among all County departments, agencies, and business partners, publicly shares sustainability efforts and works to continually improves sustainability as aligned with the County's Service Excellence Program and Strategic Plan.

In addition, I have oversight responsibilities for Ventura County Regional Energy Alliance (VCREA), the County's local energy efficiency clearinghouse, which offers a website, training seminars, and technical project support and energy planning for local stakeholders.

Summary of educational and professional background

I have been an employee of the County of Ventura for 22 years (April 2003- Current).

Master of Public Policy Administration, California Lutheran University (June 2012).

Bachelors of Arts in Business Administration, Mount St. Mary's University (May 2002).

STATEMENT OF QUALIFICATIONS OF GARRETT WONG

CROSSCUTTING and COMMERCIAL SECTORS

123 East Anapamu Street, Second Floor, Santa Barbara, CA 93101

Description of responsibilities

I am the Division Manager for the County of Santa Barbara's Sustainability Division, where I work with internal and external stakeholders to develop climate and energy policy, programs and projects. I am also a Co-Director with the Tri-County Regional Energy Network (3C-REN), in which I am responsible for creating portfolio-level strategy and overall 3C-REN prioritization; establishing and managing portfolio-level budgets; addressing and resolving high-level programmatic issues such as program design, branding and marketing, strategy, procurement, and consulting support; and organizational management.

I focus on programs that serve the residential and commercial sectors. I have strong experience working with public agencies, community-based organizations, and residents through my experience in climate action planning and implementation and establishing a regional climate collaborative network. Along with my Co-Directors, I am also responsible for efforts to engage local jurisdictions on our programs and projects to increase awareness and participation in their respective communities.

Summary   of   educational   and   professional   background

I have 14 years of experience developing and managing climate and energy programs and projects. I have been with the County of Santa Barbara since 2019 and with 3C-REN since 2025.

Prior to that, I served as the Sr. Sustainability Analyst for Climate & Energy at the City of Santa Monica, where I led climate and energy policy, programs and projects.

Master of Arts, SIT Graduate Institute

Bachelor of Arts, UC San Diego

STATEMENT OF QUALIFICATIONS OF WILL WRIGHT

2028-2031 Portfolio Plan and 2032-2035 Business Plan

1075 Serpentine Lane, Suite B, Pleasanton, CA 94566-4809

Description of responsibilities

I am a Program Consultant with Frontier Energy, Inc., which provides technical and regulatory consulting services to Tri-County Regional Energy Network (3C-REN). In this role, I facilitated the portfolio budgeting process and supported all related budgeting tasks across the Business Plan Application, including the Workbook, Narrative, and Supplemental Budget Narrative.

I also supported 3C-REN's Mid-Cycle Advice Letter (MCAL) filing in 2025, along with supporting MCAL filings for Inland Regional Energy Network and Northern Rural Energy Network in the same role.

Summary of educational and professional background

I have been with Frontier Energy since 2024.

Prior to joining Frontier Energy, I worked as a Financial Analyst with E&S Ring Management, with responsibilities including leading the budgeting and financial reporting process for a large real estate investment portfolio consisting of over $1b in value across 30+ properties.

Bachelor of Arts, Public Policy, University of Michigan - Ann Arbor, April 2019

APPENDIX B

SUPPLEMENTAL BUDGET INFORMATION

SUPPLEMENTAL BUDGET INFORMATION

Modified to Incorporate Dates Relevant to D.21-05-031

Approved Meet & Confer Document by Program Administrators, Office of Ratepayers and

the Utility Reform Network in A.17-01-003 et. Al.

Required By D.18-05-041 Ordering Paragraph 44

Table of Contents

I. BACKGROUND

Decision (D.) 18-05-041, Ordering Paragraph (OP) 44, states:

> Beginning with the annual budget advice letters due on September 3, 2019, the program administrators must include updated budget estimates in the same format as the supplemental budget information filed in this proceeding on June 12, 2017.

Consistent with this Commission directive, 3C-REN hereby provides updated budget estimates in the required supplemental format. This Appendix presents the supplemental budget information in alignment with the structure and content specified by D.18-05-041.

The accompanying tables provide detailed budget information by sector, segment, and cost category, and are intended to ensure transparency and comparability with prior Commission-approved submissions. Through this filing, 3C-REN affirms its continued compliance with the Commission's reporting requirements and commitment to providing complete and consistent budget documentation.

II. DESCRIPTION OF IN-HOUSE EE ORGANIZATIONAL STRUCTURE & ASSOCIATED COSTS

A. Narrative Description of In-House Departments/Organizations Supporting The PA's EE Portfolio

1. Functions conducted by each department/organization

The County of Ventura serves as the lead agency for administration of the 3C-REN energy efficiency (EE) portfolio. The Counties of Ventura, Santa Barbara, and San Luis Obispo have executed a Memorandum of Understanding (MOU), duly approved by each County and its

respective Board of Supervisors, formalizing their collaboration in the governance and implementation of 3C-REN programs.

Within the County of Ventura, 3C-REN is housed in the County Executive Office. Executive Office staff possess significant experience working collaboratively with investor-owned utilities and administering energy-related programs. Program design and implementation for 3C-REN have been developed by the 3C-REN team in coordination with utility partners and informed by best practices established by other Regional Energy Networks (RENs) and local government-designed programs statewide.

To ensure operational efficiency and cost-effectiveness, 3C-REN leverages existing County government infrastructure to support overall program design, implementation, contract management, and fiscal oversight. By utilizing established County departments and services, 3C-REN minimizes duplicative administrative structures and maintains a streamlined organizational model.

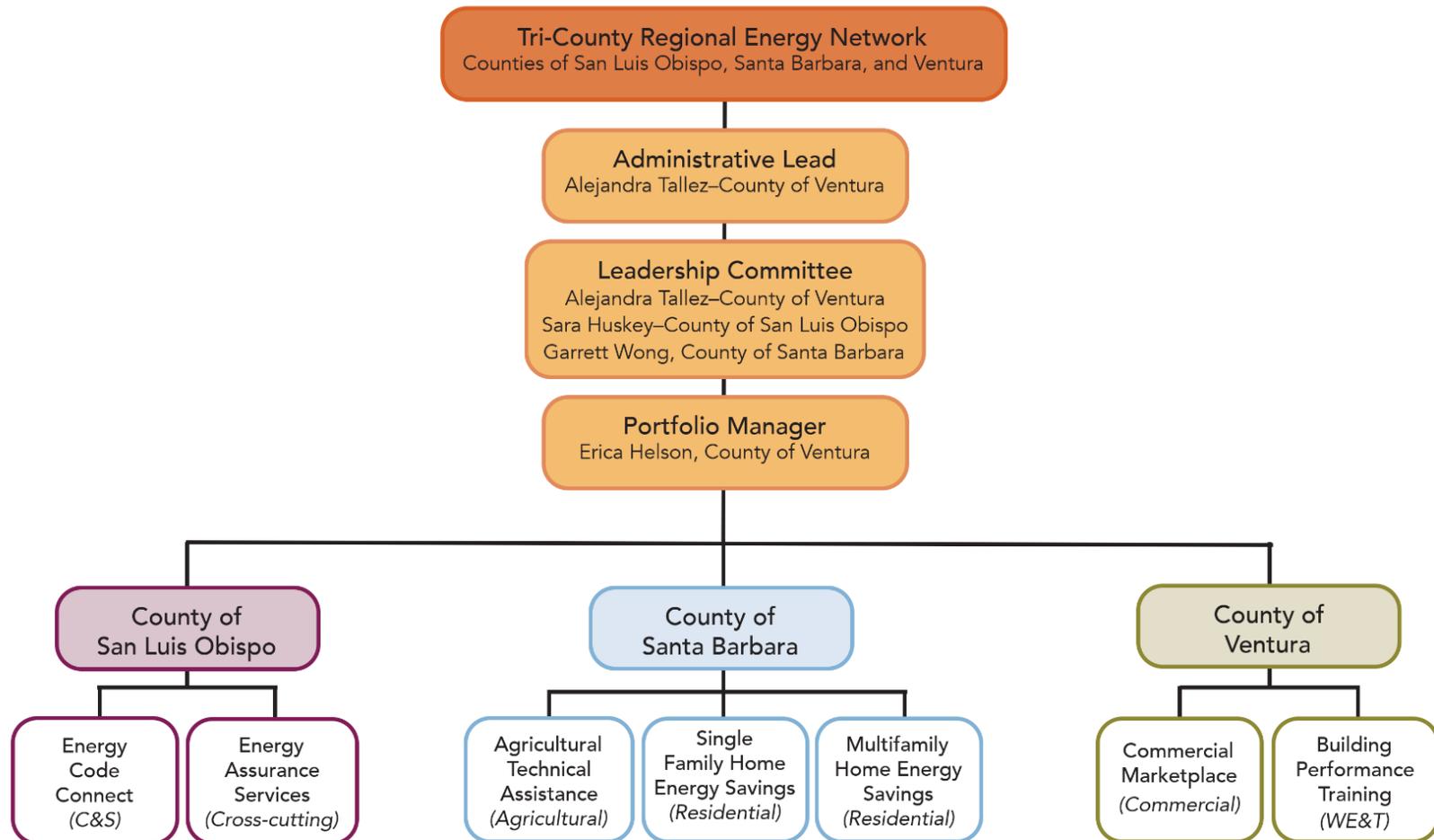Examples of County of Ventura support functions include:

- **Procurement Services**, which administer competitive solicitations and contract processes consistent with County and Commission requirements;
- **County Counsel**, which provides legal review and guidance to ensure regulatory and contractual compliance;
- **Auditor-Controller**, which oversees fiscal controls, accounting, and financial reporting;
- **Budget and Finance**, which supports budget development, monitoring, and financial planning.

In addition to Ventura County's administrative infrastructure, 3C-REN benefits from the expertise of staff within Santa Barbara and San Luis Obispo Counties. These partner counties contribute subject matter expertise and local knowledge, drawing on their extensive experience planning and implementing energy programs, collaborating with utilities, and engaging regional

stakeholders. This tri-county structure strengthens program delivery by incorporating regional perspectives while maintaining centralized administrative coordination.

Through this shared governance and integrated administrative approach, 3C-REN ensures effective portfolio oversight, fiscal accountability, and alignment with Commission directives, while maintaining a cost-efficient organizational structure.

2. 3C-REN Energy Efficiency Management Structure and Org Chart

Tri-County Regional Energy Network
Counties of San Luis Obispo, Santa Barbara, and Ventura

Administrative Lead
Alejandra Tallez–County of Ventura

Leadership Committee
Alejandra Tallez–County of Ventura
Sara Huskey–County of San Luis Obispo
Garrett Wong, County of Santa Barbara

Portfolio Manager
Erica Helson, County of Ventura

County of San Luis Obispo
- Energy Code Connect *(C&S)*
- Energy Assurance Services *(Cross-cutting)*

County of Santa Barbara
- Agricultural Technical Assistance *(Agricultural)*
- Single Family Home Energy Savings *(Residential)*
- Multifamily Home Energy Savings *(Residential)*

County of Ventura
- Commercial Marketplace *(Commercial)*
- Building Performance Training *(WE&T)*

3. Staffing Needs by Department/Organization, Including Current and Forecast For 2028-31 And Description of Changes Expected Between 2028-31

3C-REN is committed to maintaining an organizational structure that balances operational efficiency with the staffing capacity necessary to meet programmatic, regulatory, and policy objectives. Consistent with this approach, 3C-REN intends to continue implementing best practices in portfolio management, contract administration, and program oversight in order to optimize staffing resources and maintain lean Full-Time Equivalent (FTE) levels where feasible.

For the 2028–2031 period, 3C-REN's proposed staffing levels are designed to ensure full regulatory compliance, effective program delivery, and responsible stewardship of ratepayer funds while maintaining low administrative costs. The current organizational structure reflects clear alignment with Commission direction to minimize administrative overhead through reliance on existing County infrastructure, avoidance of duplicative functions, and targeted deployment of staff only where required to meet statutory and regulatory obligations. No significant staffing increases are anticipated during this period, absent material changes in Commission direction, portfolio scope, or funding levels.

- Staffing projections for 2028–2031 assume:
- Continued centralized administration through the County of Ventura as lead agency;
- Ongoing collaboration with Santa Barbara and San Luis Obispo Counties to support regional program delivery;
- Continued reliance on competitively solicited third-party implementers for direct program implementation; and
- Stable regulatory and reporting requirements consistent with current Commission directives.
  - Annual and quarterly filings
  - EM&V coordination and data submission
  - Maintain portfolio analytics and data integrity for CPUC review

o   Metrics reporting requirements

o   Budget tracking, expenditure and verification

o   Contract management for third-party implementers

3CREN's staffing levels are directly tied to the cost of producing the regulatory and program outputs required by the Commission. Each staff function corresponds to mandatory activities—including quarterly and annual filings, EM&V coordination, contract and fiscal oversight, portfolio analytics, and customer and implementer support that must be completed to meet CPUC requirements. The stability of the portfolio, the number of programs, and the cadence of required compliance activities from 2028–2031 means that workload remains constant, allowing staffing and associated costs to remain stable while still delivering all required outputs, including metrics, TSB, TRC, PAC, lifecycle savings metrics, and sector level performance reporting

4.   Non-Program Functions Currently Performed by Contractors and Changes Expected Between 2028-31

3C-REN does not retain consultants for functions that are unrelated to approved energy efficiency programs. All contractor engagements are directly tied to programmatic activities authorized by the Commission.

Certain consultants provide services that support portfolio-wide functions—such as marketing and outreach, regulatory support, reporting, and strategic planning. However, these services are integral to the implementation and administration of Commission-approved programs and are not independent "non-program" functions. For example:

* Marketing and Outreach consultants support customer engagement and program participation;

- Regulatory support consultants assist with compliance filings, reporting requirements, and coordination with the Commission and utilities;
- Strategic planning consultants provide analytical and program development support tied to approved portfolio objectives.

For the 2028–2031 period, 3C-REN anticipates that contractor utilization for these portfolio-support services will remain generally consistent with current practice. Any adjustments in consultant scope or utilization would be driven by changes in Commission requirements, portfolio size, regulatory obligations, or program complexity. At present, no material changes in non-program contractor functions are anticipated.

5. Anticipated Drivers of In-House Cost Changes by Department/Organization

Projected changes in in-house costs are primarily driven by staffing requirements and potential adjustments to the scale or scope of programs. Labor forecasts are conducted annually by each participating County and are subject to approval by the respective Boards of Supervisors. These forecasts reflect anticipated salary, benefits, and overhead adjustments consistent with County compensation policies and negotiated labor agreements.

County agencies and departments provide a range of public services and are authorized by law to recover associated costs through established service rates. Two general types of regulatory cost recovery mechanisms are applicable:

- Service rate-based recovery, reflecting hourly costs for County staff classifications; and
- Fixed charge-based recovery, where applicable.

For 3C-REN, service rate-based recovery is utilized. Service rates reflect the fully burdened hourly cost of County staff classifications and are primarily composed of:

- Salary and wages;
- Employee benefits; and

- Applicable indirect or overhead costs.

Once adopted, these service rates may be incorporated by reference into contracts, resolutions, and other County instruments governing regulatory fee recovery for services provided. Accordingly, anticipated cost drivers for 2028–2031 include:

- Annual adjustments to County-approved labor rates;

- Modifications to program scope or scale;

- Inflationary impacts on goods and services; and

- Any new regulatory or reporting requirements imposed by the Commission.

6.   Explanation of method for forecasting costs

3C-REN's forecasted costs are based on a structured and data-informed budgeting methodology that includes:

- Past program implementation costs;

- Results of competitive solicitations for program implementation;

- Analysis of historical cost data; and

- Current and anticipated labor and contract rates.

Budget Development Process

The budget development process begins with preparation of a preliminary budget component reflecting each program manager's recommended estimated costs across the following categories:

- Administration;

- Marketing and outreach;

- Direct implementation; and

- Incentives.

The preliminary budget reflects the projected full cost of maintaining current program levels and incorporates updated labor rates, existing contracts, and anticipated future contract obligations.

Following development of the preliminary budget, 3C-REN conducts a comparative analysis against historical expenditure data to assess reasonableness and identify target budget levels. This review may result in adjustments, either reductions or increases—depending on available funding and whether historical data supports the forecasted requirements. The final step in the process is to evaluate the proposed budget for compliance with applicable County policies and Commission guidance. Adjustments are made as necessary to ensure alignment with regulatory requirements and fiscal controls.

A.   **3C-REN EE "Full Time Equivalent" headcount by department/organization**

3C-REN's Full-Time Equivalent (FTE) headcount by county are incorporated herein as Table 1 – Table 4.

Table 1: Portfolio FTE - 3C-REN Total

Functional Group	Type	2028	2029	2030	2031
Policy, Strategy, and Regulatory Reporting Compliance	FTE	1.7	1.7	1.7	1.7
Program Management	FTE	12.3	12.3	12.3	12.3
Engineering Services	FTE	-	-	-	-
Customer Application/ Rebate/Incentive Processing	FTE	0.9	0.9	0.9	0.9
Customer Project Inspections	FTE	-	-	-	-
Portfolio Analytics	FTE	0.9	0.9	0.9	0.9
EM&V	FTE	-	-	-	-
ME&O (Local)	FTE	-	-	-	-
Account Management / Sales	FTE	-	-	-	-

Functional Group	Type	2028	2029	2030	2031
IT	FTE	0.9	0.9	0.9	0.9
Call Center	FTE				
Total	**FTE**	**16.7**	**16.7**	**16.7**	**16.7**

Table 2: Portfolio FTE - County of Santa Barbara

Functional Group	Type	2028	2029	2030	2031
Policy, Strategy, and Regulatory Reporting Compliance	FTE	-	-	-	-
Program Management	FTE	3.65	3.65	3.65	3.65
Engineering Services	FTE	-	-	-	-
Customer Application/ Rebate/Incentive Processing	FTE	0.90	0.90	0.90	0.90
Customer Project Inspections	FTE	-	-	-	-
Portfolio Analytics	FTE	-	-	-	-
EM&V	FTE	-	-	-	-
ME&O (Local)	FTE	-	-	-	-
Account Management / Sales	FTE	-	-	-	-
IT	FTE	-	-	-	-
Call Center	FTE	-	-	-	-
Total	**FTE**	**4.55**	**4.55**	**4.55**	**4.55**

Table 3: Portfolio FTE - County of San Luis Obispo

Functional Group	Type	2028	2029	2030	2031
Policy, Strategy, and Regulatory Reporting Compliance	FTE	0.05	0.05	0.05	0.05
Program Management	FTE	4.55	4.55	4.55	4.55
Engineering Services	FTE	-	-	-	-
Customer Application/ Rebate/Incentive Processing	FTE	-	-	-	-
Customer Project Inspections	FTE	-	-	-	-
Portfolio Analytics	FTE	-	-	-	-
EM&V	FTE	-	-	-	-

Functional Group	Type	2028	2029	2030	2031
ME&O (Local)	FTE	-	-	-	-
Account Management / Sales	FTE	-	-	-	-
IT	FTE	-	-	-	-
Call Center	FTE	-	-	-	-
Total	**FTE**	**4.60**	**4.60**	**4.60**	**4.60**

Table 4: Portfolio FTE - County of Ventura

Functional Group	Type	2028	2029	2030	2031
Policy, Strategy, and Regulatory Reporting Compliance	FTE	1.6	1.6	1.6	1.6
Program Management	FTE	4.1	4.1	4.1	4.1
Engineering Services	FTE	-	-	-	-
Customer Application/ Rebate/Incentive Processing	FTE	-	-	-	-
Customer Project Inspections	FTE	-	-	-	-
Portfolio Analytics	FTE	0.9	0.9	0.9	0.9
EM&V	FTE	-	-	-	-
ME&O (Local)	FTE	-	-	-	-
Account Management / Sales	FTE	-	-	-	-
IT	FTE	0.9	0.9	0.9	0.9
Call Center	FTE				
Total	**FTE**	**7.5**	**7.5**	**7.5**	**7.5**

B.   Table showing costs by functional area of management structure

1.   Expenses Broken Out into Labor, Non-Labor O&M

3C-REN's expenses by functional area—broken out into labor and non-labor with contract labor identified—are provided.

- Table 5: 4-year Portfolio Budget Forecast Summary (2028-2031) ($000);

- Table 6: Residential Sector Budget Detail;

- Table 7: Commercial Sector Budget Detail;

- Table 8: Agriculture Sector Budget Detail; and

- Table 9: Cross-Cutting Sector Budget Detail.

These tables present the requested cost breakdowns and are incorporated herein by reference. In the event of any inconsistency between this narrative description and the Excel budget templates, the Excel budget template shall control, consistent with Commission guidance.

Table 5: 4-year Portfolio Budget Forecast Summary (2028-2031) ($000)

	2028	2029	2030	2031	Total (4 years)
Resource Acquisition Segment Budget	-	-	-	-	-
Market Support Segment Budget	4,045	4,146	4,361	4,466	17,018
Equity Segment Budget	17,347	18,154	19,077	19,897	74,475
Codes and Standards Budget	2,118	2,200	2,293	2,378	8,989
EM&V	980	1,021	1,072	1,114	4,187
ED Portfolio Oversight	-	-	-	-	-
Total Budget	4,490	25,521	26,803	27,856	104,670

Table 6: Residential Sector Budget Detail

		2028	2029	2030	2031
Labor	Policy, Strategy, and Regulatory Reporting Compliance	9,075	9,438	9,816	10,209
Labor	Program Management	897,147	933,033	970,354	1,009,169
Labor	Engineering Services	-	-	-	-
Labor	Customer Application/Rebate/ Incentive Processing	81,087	84,330	87,703	91,212
Labor	Customer Project Inspections	-	-	-	-
Labor	Portfolio Analytics	-	-	-	-
Labor	EM&V	-	-	-	-
Labor	ED Portfolio Oversight	-	-	-	-
Labor	ME&O (Local)	-	-	-	-
Labor	Account Management / Sales	-	-	-	-
Labor	IT	-	-	-	-
Labor	Call Center	28,108	29,232	30,401	31,617
Labor	Total	1,015,417	1,056,034	1,098,275	1,142,206
Non-Labor	Third-Party Implementer (as defined per D.16-08-019, OP 10)	1,735,000	1,821,225	1,908,718	1,947,523
Non-Labor	Local/Government Partnerships Contracts (3)	-	-	-	-
Non-Labor	Other Contracts	-	-	-	-
Non-Labor	Program Implementation	542,212	562,298	589,659	606,876
Non-Labor	Policy, Strategy, and Regulatory Reporting Compliance	443,287	461,018	479,459	498,637
Non-Labor	Program Management	-	-	-	-
Non-Labor	Engineering services	-	-	-	-
Non-Labor	Customer Application/Rebate/ Incentive Processing	-	-	-	-
Non-Labor	Customer Project Inspections	-	-	-	-
Non-Labor	Portfolio Analytics	-	-	-	-
Non-Labor	EM&V	-	-	-	-
Non-Labor	ED Portfolio Oversight	-	-	-	-
Non-Labor	ME&O (Local)	104,406	106,403	110,536	112,695
Non-Labor	Account Management / Sales	-	-	-	-
Non-Labor	IT	-	-	-	-
Non-Labor	Call Center	-	-	-	-
Non-Labor	Facilities	-	-	-	-
Non-Labor	Incentives--(PA-implemented and Other Contracts Program Implementation) Programs	9,116,381	9,572,200	10,050,810	10,553,351
Non-Labor	Incentives--Third Party Program (as defined per D.16-08-019, OP 10)	-	-	-	-
Non-Labor	Total	11,941,286	12,523,144	13,139,182	13,719,083
	Sector Total	**12,956,703**	**13,579,178**	**14,237,457**	**14,861,289**

Table 7: Commercial Sector Budget Detail

		2028	2029	2030	2031
Labor	Policy, Strategy, and Regulatory Reporting Compliance	6,050	6,292	6,544	6,806
Labor	Program Management	375,696	390,724	406,353	422,607
Labor	Engineering Services	-	-	-	-
Labor	Customer Application/Rebate/ Incentive Processing	81,087	84,330	87,703	91,212
Labor	Customer Project Inspections	-	-	-	-
Labor	Portfolio Analytics	-	-	-	-
Labor	EM&V	-	-	-	-
Labor	ED Portfolio Oversight	-	-	-	-
Labor	ME&O (Local)	-	-	-	-
Labor	Account Management / Sales	-	-	-	-
Labor	IT	-	-	-	-
Labor	Call Center	-	-	-	-
Labor	Total	462,833	481,346	500,600	520,624
Non-Labor	Third-Party Implementer (as defined per D.16-08-019, OP 10)	500,000	500,000	550,000	550,000
Non-Labor	Local/Government Partnerships Contracts (3)	-	-	-	-
Non-Labor	Other Contracts	-	-	-	-
Non-Labor	Program Implementation	251,719	255,717	283,242	286,464
Non-Labor	Policy, Strategy, and Regulatory Reporting Compliance	151,984	158,063	164,386	170,961
Non-Labor	Program Management	-	-	-	-
Non-Labor	Engineering services	-	-	-	-
Non-Labor	Customer Application/Rebate/ Incentive Processing	-	-	-	-
Non-Labor	Customer Project Inspections	-	-	-	-
Non-Labor	Portfolio Analytics	-	-	-	-
Non-Labor	EM&V	-	-	-	-
Non-Labor	ED Portfolio Oversight	-	-	-	-
Non-Labor	ME&O (Local)	38,665	39,333	40,857	41,580
Non-Labor	Account Management / Sales	-	-	-	-
Non-Labor	IT	-	-	-	-
Non-Labor	Call Center	-	-	-	-
Non-Labor	Facilities	-	-	-	-
Non-Labor	Incentives--(PA-implemented and Other Contracts Program Implementation) Programs	1,590,280	1,669,794	1,753,283	1,840,947
Non-Labor	Incentives--Third Party Program (as defined per D.16-08-019, OP 10)	-	-	-	-
Non-Labor	Total	2,532,647	2,622,908	2,791,768	2,889,953
	Sector Total	2,995,480	3,104,254	3,292,368	3,410,577

Table 8: Agriculture Sector Budget Detail

		2028	2029	2030	2031
Labor	Policy, Strategy, and Regulatory Reporting Compliance	3,025	3,146	3,272	3,403
Labor	Program Management	213,916	222,472	231,371	240,626
Labor	Engineering Services	-	-	-	-
Labor	Customer Application/Rebate/ Incentive Processing	-	-	-	-
Labor	Customer Project Inspections	-	-	-	-
Labor	Portfolio Analytics	-	-	-	-
Labor	EM&V	-	-	-	-
Labor	ED Portfolio Oversight	-	-	-	-
Labor	ME&O (Local)	-	-	-	-
Labor	Account Management / Sales	-	-	-	-
Labor	IT	-	-	-	-
Labor	Call Center	-	-	-	-
Labor	Total	216,941	225,619	234,643	244,029
Non-Labor	Third-Party Implementer (as defined per D.16-08-019, OP 10)	-	-	-	-
Non-Labor	Local/Government Partnerships Contracts (3)	-	-	-	-
Non-Labor	Other Contracts	-	-	-	-
Non-Labor	Program Implementation	220,967	223,556	256,464	258,723
Non-Labor	Policy, Strategy, and Regulatory Reporting Compliance	25,331	26,344	27,398	28,494
Non-Labor	Program Management	-	-	-	-
Non-Labor	Engineering services	-	-	-	-
Non-Labor	Customer Application/Rebate/ Incentive Processing	-	-	-	-
Non-Labor	Customer Project Inspections	-	-	-	-
Non-Labor	Portfolio Analytics	-	-	-	-
Non-Labor	EM&V	-	-	-	-
Non-Labor	ED Portfolio Oversight	-	-	-	-
Non-Labor	ME&O (Local)	47,642	47,682	48,352	48,395
Non-Labor	Account Management / Sales	-	-	-	-
Non-Labor	IT	-	-	-	-
Non-Labor	Call Center	-	-	-	-
Non-Labor	Facilities	-	-	-	-
Non-Labor	Incentives--(PA-implemented and Other Contracts Program Implementation) Programs	-	-	-	-
Non-Labor	Incentives--Third Party Program (as defined per D.16-08-019, OP 10)	-	-	-	-
Non-Labor	Total	293,940	297,581	332,213	335,611
	Sector Total	510,881	523,200	566,856	579,640

Table 9: Cross-Cutting Sector Budget Detail

		2028	2029	2030	2031
Labor	Policy, Strategy, and Regulatory Reporting Compliance	12,100	12,584	13,088	13,611
Labor	Program Management	1,267,864	1,318,579	1,371,322	1,426,175
Labor	Engineering Services	-	-	-	-
Labor	Customer Application/Rebate/ Incentive Processing	69,503	72,283	75,174	78,181
Labor	Customer Project Inspections	-	-	-	-
Labor	Portfolio Analytics	-	-	-	-
Labor	EM&V	-	-	-	-
Labor	ED Portfolio Oversight	-	-	-	-
Labor	ME&O (Local)	-	-	-	-
Labor	Account Management / Sales	-	-	-	-
Labor	IT	-	-	-	-
Labor	Call Center	159,276	165,648	172,273	179,164
Labor	Total	1,508,744	1,569,094	1,631,858	1,697,132
Non-Labor	Third-Party Implementer (as defined per D.16-08-019, OP 10)	-	-	-	-
Non-Labor	Local/Government Partnerships Contracts (3)	-	-	-	-
Non-Labor	Other Contracts	-	-	-	-
Non-Labor	Program Implementation	2,714,536	2,783,070	2,908,989	2,977,832
Non-Labor	Policy, Strategy, and Regulatory Reporting Compliance	258,317	268,649	279,395	290,571
Non-Labor	Program Management	-	-	-	-
Non-Labor	Engineering services	280,000	280,000	310,000	310,000
Non-Labor	Customer Application/Rebate/ Incentive Processing	-	-	-	-
Non-Labor	Customer Project Inspections	-	-	-	-
Non-Labor	Portfolio Analytics	-	-	-	-
Non-Labor	EM&V	-	-	-	-
Non-Labor	ED Portfolio Oversight	-	-	-	-
Non-Labor	ME&O (Local)	159,986	162,104	167,388	169,664
Non-Labor	Account Management / Sales	-	-	-	-
Non-Labor	IT	-	-	-	-
Non-Labor	Call Center	-	-	-	-
Non-Labor	Facilities	-	-	-	-
Non-Labor	Incentives--(PA-implemented and Other Contracts Program Implementation) Programs	-	-	-	-
Non-Labor	Incentives--Third Party Program (as defined per D.16-08-019, OP 10)	-	-	-	-
Non-Labor	Total	3,412,839	3,493,823	3,665,773	3,748,067
	Sector Total	4,921,583	5,062,917	5,297,630	5,445,199

2. Identify any capital costs

3C-REN does not anticipate any capital costs.

C. Table showing cost drivers across the EE organization

The table summarizing cost drivers across the 3C-REN energy efficiency (EE) organization reflects the principal factors influencing anticipated cost increases or decreases. While examples in other contexts may reference departmental cost increases, 3C-REN's cost variability is more directly attributable to major programmatic and structural cost drivers.

The primary driver of projected cost increases is the continued expansion and maturation of program delivery. As portfolio scope grows and programs advance in scale and complexity, associated administrative and implementation costs increase proportionally. In general, most cost categories are projected to rise in the range of approximately 1–5 percent annually, reflecting inflationary pressures, labor adjustments, contractual escalations, and other market conditions.

Administrative cost drivers include, but are not limited to:

- **Labor Costs**: Adjustments to County-approved salary, benefit, and overhead rates;

- **Portfolio Scope and Regulatory Participation**: Increased regulatory compliance obligations, reporting requirements, and stakeholder engagement associated with a growing portfolio;

- **Procurement and Contracting Activities**: Expansion of competitive solicitations and contract management activities as new programs are added or existing programs are re-solicited;

- **Data Management and Reporting Infrastructure**: IT services and related systems required to meet Commission reporting requirements, including data collection, validation, and submission.

These factors collectively influence overall administrative expenditures and are expected to scale in alignment with program expansion and regulatory complexity.

Implementation cost drivers are primarily program-specific and include:

- **Number of Program Participants**: Increased participation directly affects incentive payments, contractor oversight, and customer support requirements;

- **Program Planning, Development, and Design**: Ongoing refinement of program strategies in response to market conditions, policy changes, and evaluation findings;

- **Project Management Activities**: Staff and contractor time devoted to data management, developing scopes of work, coordinating with contractors and customers, setting and monitoring performance goals, responding to market dynamics, and addressing customer inquiries (e.g., calls, emails, and written correspondence);

- **Market Transformation and Long-Term Strategic Planning**: Investments in activities that support durable market change, contractor engagement, workforce development alignment, and long-term portfolio strategy.

Together, these drivers reflect the operational realities of delivering effective energy efficiency programs while maintaining compliance with Commission guidance and advancing statewide energy and climate objectives.

Table 10: Annual Change in Category Costs

	2028	2029	Increase ($)	Increase (%)
Admin	1,527,816	1,594,328	66,513	4%
Marketing	360,699	365,922	5,223	1%
DINI	10,915,326	11,297,794	382,468	4%
DI Incentives	10,706,661	11,241,994	535,333	5%
Programs Total	23,510,501	24,500,038	989,537	4%
	2029	**2030**	Increase ($)	Increase (%)
Admin	1,594,328	1,662,901	68,573	4%
Marketing	365,922	377,948	12,027	3%
DINI	11,297,794	11,886,076	588,282	5%
DI Incentives	11,241,994	11,804,094	562,100	5%
Programs Total	24,500,038	25,731,020	1,230,982	5%
	2030	**2031**	Increase ($)	Increase (%)
Admin	1,662,901	1,733,617	70,716	4%
Marketing	377,948	383,582	5,634	1%
DINI	11,886,076	12,229,784	343,707	3%
DI Incentives	11,804,094	12,394,298	590,205	5%
Programs Total	25,731,020	26,741,282	1,010,262	4%

D.   Explanation of allocation of labor and O&M costs between EE-functions and GRC-functions or other non-EE functions

1.   Allocation of Labor When an Employee Spends Less Than 100% of Time on EE

As a non-IOU Program Administrator, 3C-REN does not participate in General Rate Case (GRC) proceedings and therefore does not allocate labor costs between Energy Efficiency (EE) and GRC functions. All staff and consultant time charged to the 3C-REN portfolio directly supports administration, marketing, implementation, evaluation, measurement, and verification (EM&V), or other approved portfolio activities.

Accordingly, there is no need to bifurcate employee costs between EE and GRC functions. All labor costs described herein are fully attributable to 3C-REN programs.

Staff labor costs are fully burdened and tracked at the project and/or activity level. County labor rates are established to ensure total cost recovery and include salary, benefits, and applicable overhead. Each County participating in 3C-REN is treated as a separate cost center, and a service rate is established for each classification within each division. These rates are developed using general cost allocation guidelines and allow costs to be readily traced to specific programs or activities.

On a monthly basis, the County of Ventura—serving as lead agency—provides a detailed expense report to SoCalGas, 3C-REN's fiscal agent. This report itemizes all expenditures associated with approved EE portfolio programs, including:

- Staff time by individual;
- Applicable labor rate;
- Program assignment; and
- Budget category (e.g., administration, marketing, implementation).

Expense tracking follows a standardized format developed by SoCalGas in coordination with Southern California Edison (SCE) and Pacific Gas & Electric (PG&E), ensuring transparency in operating budgets, current expenditures, and remaining balances.

2.   Method Used to Determine Proportion Charged to EE Balancing Accounts

This provision is not applicable to 3C-REN. As a non-IOU Program Administrator, 3C-REN does not maintain EE balancing accounts.

3.   EE Functions Most Likely to be Performed by Employees Who Also Perform Non-EE

Certain County employees may perform both EE-related and non-EE-related duties in their broader County roles. Positions most likely to include both types of work include:

- Program Management;
- Portfolio Analytics; and
- Policy, Strategy, and Regulatory Administration.

However, all time charged to the 3C-REN portfolio is tracked and coded specifically to approved EE programs and activities. Only time directly supporting 3C-REN portfolio functions is billed to the portfolio.

4. Recovery of Administrative and General Expenses

This provision is not applicable to 3C-REN. As a non-IOU Program Administrator, 3C-REN does not recover costs through GRC rates and does not allocate burden-related A&G expenses between EE and non-EE functions in that manner.

5. Allocation of Non-Labor Resources Supporting Both EE And Non-EE Activities

All activities are coded at the program level, and associated non-labor resources or systems are charged directly to the respective program based on activity coding. Because 3C-REN does not allocate costs between EE and non-EE rate recovery mechanisms, there is no need for cross-allocation between EE and non-EE functions.

6. EE O&M costs that are most likely to be spread to non-EE functions

General Operations and Maintenance (O&M) costs are incorporated into the fully burdened labor rates applied to each program. As a result, overhead costs are proportionally recovered through the programs that utilize the associated staff time. There are no O&M costs intentionally spread between EE and non-EE functions.

III.   BUDGET TABLES INCLUDING INFORMATION IDENTIFIED IN THE SCOPING MEMO

This section responds to the April 14, 2017 Scoping Memo and Ruling of the Assigned

Commissioner and Administrative Law Judges in A.17-01-003 et al.

A.   Attachment-A, Question C.8

The Scoping Memo requests:

> "Present a single table summarizing energy savings targets, and expenditures by sector (for the six specified sectors). This table should enable/facilitate assessment of relative contributions of the sectors to savings targets, and relative cost-effectiveness."

TURN and CAL PA invited Program Administrators to propose a common table format to

present this information. 3C-REN's response is provided in the Portfolio Summary Table,

included herein as Table 11, which summarizes:

- Energy savings targets by sector;
- Expenditures by sector; and
- Relative cost-effectiveness metrics.

The method used to estimate the costs presented in the C.8 table is consistent with the budgeting

methodology described above and in the Application Attachment Tables (Exhibit 3C-REN-03,

Appendix B). Costs are derived from:

- Historical program expenditures;
- Competitive solicitation results;
- Forecasted labor and contract rates; and
- Program-level cost projections validated against historical spending trends and Commission guidance.

The Portfolio Summary Table is structured to allow clear comparison across sectors and to facilitate assessment of sector contributions to overall savings targets and portfolio cost-effectiveness.

1. Proposed Table Format and Method Used to Estimate Costs, C.8 Table

TURN and CAL PA invited Program Administrators to propose a common table format to summarize energy savings targets and expenditures by sector, and to include a brief description of the method used to estimate the costs presented in the C.8 table.

3C-REN's response is provided in the Portfolio Summary Table, included herein as Table 11. This table presents, in a single consolidated format:

- Energy savings targets by sector;
- Budgeted expenditures by sector; and
- Associated cost-effectiveness metrics, where applicable.

The table is designed to facilitate comparison across sectors and to support assessment of each sector's relative contribution to overall portfolio savings and cost-effectiveness.

The costs presented in Table 11 are derived from 3C-REN's established budget development methodology. Specifically, cost estimates are based on:

- Historical program implementation costs;
- Results of competitive solicitations for third-party implementers;
- Forecasted labor and contract rates approved through County processes; and
- Analysis of prior expenditure trends relative to projected program activity levels.

Preliminary program budgets are developed by program managers to reflect anticipated costs for administration, marketing, direct implementation, and incentives. These preliminary estimates are then evaluated against historical spending data and available funding levels to determine

reasonable target budgets. Final figures are reviewed for compliance with applicable County policies and Commission guidance.

Accordingly, Table 11 reflects a data-informed and methodologically consistent estimate of expenditures and savings by sector for the applicable portfolio period.

Table 11: 3C-REN 2028-31 Budget Savings by Sector

PY	Sector	Budget	TSB	TRC	PAC	kWh	kW	Therms	Lifecycle Net kWh	Lifecycle Net Therms	Lifecycle Net Electric CO2e	Lifecycle Net Gas C02e
2028	Residential	13,571,703	5,838,424	0.23	0.58	(4,098,053)	(397.40)	465,922	(51,679,811)	5,923,081	(10,331)	31,452
2028	Commercial	2,995,480	1,401,812	0.38	0.51	293,880	33.55	63,933	4,267,559	639,335	257	3,395
2028	Agricultural	510,881	-			-	-	-	-	-	-	-
2028	Cross-Cutting	5,231,583	-			-	-	-	-	-	-	-
2028	Portfolio Support	1,200,855	-			-	-	-	-	-	-	-
2028	EM&V	979,604	-			-	-	-	-	-	-	-
2028	TOTAL Portfolio	24,490,105	7,240,236	0.21	0.42	(3,804,173)	(363.86)	529,855	(47,412,251)	6,562,415	(10,074)	34,846
2029	Residential	14,234,178	6,428,082	0.25	0.60	(4,302,955)	(417.27)	489,218	(54,263,801)	6,219,235	(10,722)	33,024
2029	Commercial	3,104,254	1,562,919	0.41	0.55	291,198	33.24	68,851	4,292,374	688,514	221	3,656
2029	Agricultural	523,200	-			-	-	-	-	-	-	-
2029	Cross-Cutting	5,382,917	-			-	-	-	-	-	-	-
2029	Portfolio Support	1,255,489	-			-	-	-	-	-	-	-
2029	EM&V	1,020,835	-			-	-	-	-	-	-	-
2029	TOTAL Portfolio	25,520,873	7,991,001	0.22	0.44	(4,011,758)	(384.03)	558,069	(49,971,427)	6,907,749	(10,501)	36,680

PY	Sector	Budget	TSB	TRC	PAC	kWh	kW	Therms	Lifecycle Net kWh	Lifecycle Net Therms	Lifecycle Net Electric CO2e	Lifecycle Net Gas C02e
2030	Residential	14,932,457	7,175,321	0.26	0.62	(4,518,103)	(438.14)	513,679	(56,976,991)	6,530,196	(825)	2,728
2030	Commercial	3,292,368	1,733,478	0.43	0.57	288,516	32.94	73,769	4,317,189	737,694	4	392
2030	Agricultural	566,856	-			-	-	-	-	-	-	-
2030	Cross-Cutting	5,627,630	-			-	-	-	-	-	-	-
2030	Portfolio Support	1,311,708	-			-	-	-	-	-	-	-
2030	EM&V	1,072,126	-			-	-	-	-	-	-	-
2030	TOTAL Portfolio	26,803,145	8,908,798	0.24	0.46	(4,229,588)	(405.20)	587,448	(52,659,803)	7,267,890	(820)	3,119
2031	Residential	15,596,289	8,080,113	0.27	0.66	(4,744,008)	(460.04)	539,363	(59,825,841)	6,856,706	(861)	2,864
2031	Commercial	3,410,577	1,977,342	0.45	0.62	390,638	44.59	73,769	5,542,662	737,694	44	392
2031	Agricultural	579,640	-	-	-	-	-	-	-	-	-	-
2031	Cross-Cutting	5,785,199	-	-	-	-	-	-	-	-	-	-
2031	Portfolio Support	1,369,577	-	-	-	-	-	-	-	-	-	-
2031	EM&V	1,114,220	-	-	-	-	-	-	-	-	-	-
2031	TOTAL Portfolio	27,855,502	10,057,454	0.25	0.48	(4,353,370)	(415.45)	613,132	(54,283,179)	7,594,400	(817)	3,256

B. Attachment-A, Question C.9

The Scoping Memo requests:

> "Using a common budget template developed in consultation with interested stakeholders (hopefully agreed upon at a 'meet and confer' session), display how much of each year's budget each PA anticipates spending 'in-house' (e.g., for administration, non-outsourced direct implementation, other non-incentive costs, marketing), by sector and by cross-cutting program."

1. Proposed Table Format

TURN and CAL PA invited Program Administrators to propose a common table format to present this information. 3C-REN's response is provided in this narrative as:

- Table 6: Residential Sector Budget Detail through
- Table 9: Cross-Cutting Sector Budget Detail

These tables identify anticipated annual in-house expenditures by sector and cross-cutting program, broken out by major cost categories, including:

- Administration;
- Marketing and outreach;
- Non-outsourced direct implementation; and
- Other non-incentive costs.

The format is structured to allow clear identification of in-house expenditures distinct from incentive payments and outsourced implementation costs, thereby facilitating transparency and cross-sector comparison.

2. Method used to estimate costs in the C.9 Table

3C-REN estimates in-house costs using a data-informed forecasting methodology. Specifically:

- Labor Costs are tracked by program and activity. Forecasts are based on prior-year actual expenditures and adjusted to reflect anticipated program changes, projected staffing needs, and County-approved labor rate increases.

- Non-Labor Costs (including marketing, materials, professional services, and other O&M expenses) are forecast based on planned program activities and historical expenditure trends.

- Program-Level Time Tracking ensures that staff time is coded to specific programs, enabling accurate allocation of in-house expenditures across sectors.

This approach ensures that in-house cost projections are grounded in actual spending patterns while accounting for planned programmatic changes and inflationary factors.

C.   Attachment-A, Question C.10

The Scoping Memo requests:

"Present a table akin to PG&E's Figure 1.9 (Portfolio Overview, p. 37) or SDG&E's Figure 1.10 (p. 23) that not only shows anticipated solicitation schedule of 'statewide programs' by calendar year and quarter, but also expected solicitation schedule of local third-party solicitations, by sector, and program area (latter to extent known, and/or by intervention strategy if that is more applicable). For both tables, and for each program entry on the calendar, give an approximate size of budget likely to be available for each solicitation (can be a range)."

1.   Proposed Table Format and Method Used to Estimate Costs

TURN and CAL PA invited Program Administrators to propose a common table format for this information and to provide a brief description of the method used to estimate solicitation budgets.

3C-REN does not currently administer any statewide programs. Accordingly, there are no anticipated statewide program solicitation schedules to report.

With respect to local third-party solicitations, 3C-REN conducts competitive procurements as required to implement approved portfolio programs. When applicable, estimated solicitation budgets are derived from:

- Approved program budgets by sector and segment;

- Historical contract expenditures;

- Anticipated scope of work; and

- Market conditions affecting implementation costs.

At present, because 3C-REN does not administer statewide programs and does not have new statewide solicitations planned for the applicable period, no statewide solicitation calendar is provided. Any future third-party solicitations will be conducted consistent with County procurement policies and Commission guidance, and budgets will be based on the approved portfolio allocations.).

APPENDIX C

D.23-06-055 OP2 STATEWIDE ASSESSMENT FRAMEWORK PROPOSAL

Statewide Energy Efficiency Program Assessment Criteria

D.23-06-055 OP2 Statewide Assessment Framework

February 12, 2026

Overview Of PA Coordination Through a Working Group Process

PG&E led a working group of participating PAs to refine an IOU developed proposal for evaluating EE programs pursuant to OP 2 of D.23-06-055.[1] The original draft of the IOU proposal began development in the summer of 2025 by a small IOU only working group (WG). The IOU WG's goal was to prepare a guiding framework for further development by the broader PA group (RENs, IOUs and CCA). This effort resulted in a draft proposal that was circulated with all PAs for the October 16, 2025 monthly all-PA call. Subsequently, on November 5, 2025, there was a kick-off meeting to jump start an all PA WG to refine the proposal.[2] Non-IOU PAs were not included prior to November and were given a draft proposal developed by the IOU PAs.[3] The WG's goal was to further refine the IOU developed proposal and to identify issues that the Commission would potentially need to address as part of this process. PAs were given the opportunity to provide feedback during the meetings and in redline/comment form on the draft proposal.[4] While there were a number of useful edits and questions raised in the document not all PAs agreed to the

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[1] The portfolio administrators (PAs) must coordinate among themselves and propose a statewide program portfolio assessment process to review and recommend changes to the portfolio of statewide programs. This proposed assessment process shall be included in the PAs' portfolio applications to be filed in 2026 or may be filed as a motion in Rulemaking 13-11-005 or its successor, if the proposal is ready before the next portfolio application filing.

[2] The WG met from November 2025 through January 2026 on a close-to-weekly basis. However, certain PAs could not participate at this frequency due to workload and bandwidth of staff.

[3] The intent by the IOUs was to develop a starting point framework from which all PAs could use in order to address this complicated topic. The IOU developed straw proposal was intended to reduce the amount of time that it would take to develop a full proposal from scratch amongst the 12 PAs. Although, individual PAs were not precluded from developing their own proposal for submission as part of their Business Plan Application.

[4] The original 10/15/2025 draft proposal received edits and comments, which were consolidated into a 12/31/2025 draft for further consideration. Not all PAs agreed to sign on to the developed draft with most providing a qualified support as reflected in the survey results (See Appendix B). An updated version of the document was released on 1/16/2026 for review and a survey for completion by PAs. Subsequently, another draft was released on 1/27/2026 before it was finalized by the end of January 2026.

proposed first draft; however, the WG discussions that ensued were useful in identifying areas needing additional development and/or formal Commission input.[5]

Supporting Information

In order to help stakeholders advance the OP 2 effort beyond this framework, the proposal includes supporting information in Appendices A and B. Specifically, Appendix A identifies issues that merit additional development and/or warrant formal input by the Commission; Appendix B includes results of a survey gauging general sentiment about the proposal along with PA specific feedback.

GUIDING PRINCIPLES - The following Guiding Principles represent the shared commitments of PAs in the delivery of statewide-administered energy efficiency programs.

1. Support the State's energy efficiency policy goals. Orient portfolio design around State and Regulatory objectives and act in the best interests of all customers.
2. Do no harm. Make decisions that preserve our collective ability to meet energy savings goals, achieve TSB goals, achieve cost-effectiveness for the resource acquisition segment [IOUs only], and minimize impacts to existing local and downstream programs.
3. Advocate for all PAs. Recognize that the whole is greater than the sum of its parts. Be willing to collaborate with other PAs in planning and decision-making efforts.
4. Assume best intentions. In an environment of shared goals and shared directives, be humble in the approach and ambitious for the broader group's success.
5. Be good listeners. Take responsibility for the environment by which decisions are made such that all participants have the opportunity to participate.
6. Take a stand for customers. Take into consideration the customer experience and strive for simplicity, clarity, and ease.
7. Wisely pursue change. Demonstrate open-mindedness to changes in design, delivery and administration

Programs should support customer fuel diversity,[6] affordability and strategic decarbonization in a way that reflects the diversity of California's energy landscape. To support customer demand, statewide program pathways should be diverse with multiple paths considered or incentivized.

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[5] Commission staff joined the December 22, 2025 WG meeting, which provided an opportunity for ED staff to hear about PA concerns. ED's participation was intended to be informal with no expectation of official Commission guidance.

[6] There is a diversity of perspectives on whether the offering of dual fuel programs should be discretionary or required.

STATEWIDE EE PROGRAM ADMINISTRATOR RESPONSIBILITIES – The following responsibilities are directed by D.18-05-041, and are the responsibility of any PA leading a SW program.

- Program vision development, design/delivery, and intervention strategies[7])
- Procurement, contract administration, and co-funding management from partner PAs.
- Implementer oversight:
    - The lead PA would have sole responsibility for implementer management, rewards, and any necessary corrective action
    - Lead PA would review implementer performance and program performance on a quarterly basis
- Meeting savings goals and customer satisfaction levels
- Metrics development
- Reporting
- Fiscal oversight

OBJECTIVE

To provide a comprehensive, structured, and transparent framework for assessing Statewide energy efficiency programs across all portfolio administrators. This framework ensures that each program is evaluated for statewide suitability, delivery efficiency, strategic alignment, equity, and market impact. The assessment process supports informed decisions on whether programs should be maintained, redesigned, localized, sunset, transferred, or integrated, and guides the selection of lead administrators, all in alignment with California's energy policy goals and stakeholder interests.

Program outcomes of the framework include:

- Continue as-is
- Redesign or expand
- Localize
- Sunset[8]

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[7] SW program leads may coordinate with other PAs to address matters that may not be resolved through ongoing SW coordination efforts under the "SWEET" (Statewide Energy Efficiency Team) process. The SWEET, represented by SW PA leads, meets bi-weekly to address ongoing matters associated with SW program administration.

[8] Consistent with D. 21-05-031, OP 12, an assigned lead PA for a Statewide program can sunset a SW Program by means of a Tier 2 Advice Letter. Likewise, "a Tier 2 advice letter is also required when an existing program is being elevated from a local or regional program to a proposed statewide program or when the lead administrator for a statewide program is proposed to change." Furthermore, D.23-06-055, dicta at p. 10 states: "Meanwhile, during 2024-2027, the composition of the statewide portfolio need not remain static.

- Reassign to another PA (IOUs, RENs, and CCAs)
  - Selection of Lead PA
- Elevate to Statewide
  - Selection of Lead PA (IOUs, RENs, and CCAs)

GUIDELINES FOR ASSESSMENT

- **Customer Affordability**: Identify EE programs that help customers achieve measurable energy and demand reductions that translate into lower utility bills.
- **Ratepayer Affordability**[9]: Identify EE programs that deliver measurable value to ratepayers, with a focus on maximizing energy savings, benefits per dollar spent, and bill relief.
- **Efficient Program Delivery**: Focus on optimizing resource acquisition and/or customer benefits as appropriate based on program segmentation, and minimizing *redundant* [10] programs.
- **Equity**: Design programs to deliver to disadvantaged, underserved, and hard-to-reach communities (collectively referred to in this document as "equity criteria").[11]
- **Transparency**: Use standardized, data-driven methodologies across all PAs, including customer data sharing to support claimable EE results.
- **Timing**: Assessment should be completed in time for results to be incorporated into Application, TUAL, or MCAL cycles.[12]

PAs may request program closure or downsizing where a statewide resource acquisition program has declining prospects through the filing of a Tier 2 advice letter. In addition, existing programs may also be modified by updating an implementation plan."

[9] The initial draft proposal advanced "Affordability" as an over-arching assessment factor. However, at the tail end of the WG effort, one PA distinguished affordability between *customer* and *ratepayer*. While this distinction was not fully vetted by the WG, a PA did express concern about using "ratepayer affordability" due to the complexities involved. On the other hand, this same PA indicated that "customer affordability" is more easily determined as it can be isolated/attributed to a single program. This issue warrants further examination.

[10] The Working Group discussion revealed certain PAs had concerns about "relitigating" aspects of OP 32 from D.23-06-055, which commissioned a study "to provide information on substantively similar programs, and steps they have taken and will take to mitigate or minimize ratepayer risk of program overlap and duplication." There is currently the Joint Coordination Memo (JCM) process that is intended to look at the overlap/duplication issue. However, it's recognized there may be some level of strategic overlap that is acceptable based on a program's profile.

[11] *Equity Criteria*: The use of the term disadvantaged is in the context of Disadvantaged Communities (or DACs) as identified by the California Environmental Protection Agency pursuant to Health and Safety Code Section 39711. With respect to the use of the terms underserved and hard-to-reach, these are defined by CPUC Decision 23-06-055, COL 31, for underserved; and COL 33 for hard-to-reach. It should be noted that COL 32 provides flexibility to include additional groups within the underserved population based on the mechanism set forth by COL 32.

[12] There is lack of consensus as to the appropriate forum and timing of these assessments. While the ability to undertake more frequently is preferable, the potential need for incremental funding and full regulatory vetting would generally point to the Application funding cycle as the best pathway. However, PAs appear to

STATEWIDE ASSESSMENT FRAMEWORK

This framework supports a right-sized, effectively delivered, and efficiently administered statewide EE portfolio that aligns with today's EE policy direction, market dynamics, and EE strategic priorities such as customer energy savings, cost-effectiveness, decarbonization, equity, and flexible delivery. It's built on a series of gatekeeping questions split into sections (i.e., Sections 1-5) that aids the reviewer[13] in undertaking the assessment of the program in question. These questions are intended to be guides rather than absolute requirements in supporting the assessment process.

Figure 1. Overall Decision-Making Framework

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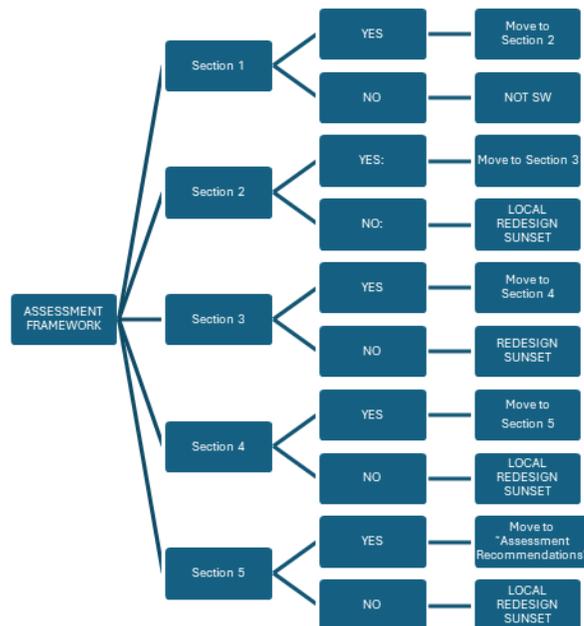
support the ability to undertaking assessments more frequently, potentially as part of the TUAL and MCAL or as part of a separate dedicated filing process (e.g., a Tier 3 submission).

[13] Informally, the Energy Division clarified that the undertaking of assessments would generally be PA driven and should be fair, unbiased, and consensus-driven.

Section 1. Statewide Program Gatekeeping Questions (New and Existing Programs)

The assessment of statewide or regional programs will begin with the following baseline questions based on its segmentation:[14]

Criteria	Yes/No
For Resource Acquisition Programs	
Does the program ensure inclusion of all critical resources (gas and electric) necessary to maintain reliability, affordability, and customer choice during the transition? [See FN 6]	
Is the program truly mass-market[15] and uniform for both gas and electric across territories (e.g., smart thermostats)? [See FN 6]	
Does it use a non-site-specific delivery model including both fuels (e.g., original definition of midstream)? [See FN 6]	
Is the PA delivering program able to reasonably manage cross-utility risk without territorial control or data sharing challenges and barriers?	
Does the program solve an identified, statewide problem that cannot be effectively addressed by local or regional means?	
Does implementing statewide delivery significantly improve cost-effectiveness or enhance customer access compared to a local or regional delivery model?	
For Market Support[16] Programs	
Is the program's primary objective to support the statewide market rather than deliver immediate resource savings?	
Does the program target a statewide market failure or gap that cannot be addressed effectively by resource acquisition programs? (e.g., lack of supply chain readiness, emerging tech adoption, training/workforce?)	
Are there measurable market transformation indicators (market share, cost declines, codes/standards advancement) that can be tracked and are consistent throughout the state?	
Is there detailed evidence that statewide delivery would accelerate or amplify measurable market effects compared to local delivery?	

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[14] While Section 1 is limited to the Resource Acquisition, Market Support and Equity segments, this framework can be applied to Codes and Standards (C&S) along with Workforce, Education and Training (WE&T). Since future refinements to this framework are anticipated these additional segments could be developed at that time.

[15] Mass Market refers to broad market segments, like residential homes and small businesses, which share similar purchasing patterns and are targeted for energy-saving programs through accessible measures like rebates, simple installation processes, and standardized information.

[16] Decision 21-05-031 at p.14 defines Market Support as "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."

For Equity[17] Programs	
Is the program's primary objective to improve access, affordability, or resilience for meeting the needs of equity criteria populations (DAC, Hard-to-Reach, Underserved) statewide, rather than delivering energy savings or cost-effective benefits?	
Is the program reaching the intended equity criteria target populations?	
Are incentives and program processes aligned with accessibility and ease of participation for equity criteria target participants?	
Does the program address statewide barriers (financial or geographic) that limit participation by equity criteria communities?	
Is there a clear plan to engage trusted messengers (e.g., CBOs, tribal organizations, local governments) across the entire state?	
Is there detailed evidence that statewide delivery can create measurable improvements in equity criteria outcomes for the specific program, when compared to local-only delivery?	

If less than a majority[18] of answers are "No," the program should not be statewide.

IF more than a majority of questions were answered as YES, continue on to Section 2.

For NEW and EXISTING PROGRAMS which pass Section 1, CONTINUE

Section 2. Delivery Model and Risk Evaluation

Question	Consideration	Yes/No
Does the program use a midstream delivery model?	*Sales-only (midstream/upstream) vs. install-based (downstream/direct install)* Midstream= Yes Downstream= No Upstream= Yes	
Is the model still aligned with CPUC policy?	*E.g., does it still meet the intent of midstream?*	

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[17] Decision 21-05-031 at p.14-15 defines Equity as "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.

[18] The threshold for "majority" should be established by the PAs and/or set by the Commission. In some cases a simple majority (i.e., greater than 50%) is sufficient and in other cases a "super-majority" might be appropriate (i.e., greater than 66.6%).

Is downstream data collection or quality verification **unnecessary** for this program?	*If yes, it may be feasible for statewide. Although, gathering downstream data for all participants is complex and burdensome in SW offerings.*	
Is the administrative burden on the lead PA proportionate to the value delivered?	*Legal, regulatory, QA/QC, EM&V risk, data sharing, etc.*	

If at least three (majority) of the answers are YES, continue onto Section 3.

If more than one of the answers are NO, consider LOCALIZATION, REDESIGN, or SUNSET program.

Section 3. Strategic Fit

Question	Yes/No
Does the program align with the (or latest) Business Plan (e.g., decarbonization, equity, electrification)?	
Does the program align with the CPUC's policy objectives as stated in decision language or Public Utilities Code statute?	
Does the program avoid overlapping with or negatively impacting existing local delivery options?	

If at least two (majority) of the answers are YES, continue to Recommendations.

If more than one of the answers are NO, consider LOCALIZATION, REDESIGN or SUNSET program.

Section 4. Performance and Accountability Assessment (EXISTING)

Metric	Assessment Notes	Yes/No/NA
Is the program achieving program goals and metrics? (TSB, GWh, MW)	Is it performing as expected?	
Is the program contributing to portfolio goals?	Is it advancing decarbonization, fuel substitution, etc.?	
Is the program cost-effective (applies only to RA)?	Is it successfully delivering cost effective savings, or failing the TRC tests?	
Is the program forecasting accurately?	Is the program accurately forecasting TSB, GWh, MW and budget?	
Is the program demonstrating clear signs of growth and scalability?	Is it scaling or stalling?	

Are there minimal barriers to participation or savings realization?	Market, tech, permitting, site-specific issues?	
Have past corrective actions, if any, been successful in correcting program performance?	Have the actions been successful in correcting program performance?	

If majority of the answers are YES, continue onto Section 4.

If majority of the answers are NO, consider REDESIGN, LOCALIZE, or SUNSET program.

Section 5. Market Support & Equity Assessment

Question	Yes/No
Market Support – Focus on supporting long-term success of the market, enabling market viability and innovation	
Does statewide administration reduce market confusion and create consistent signals to manufacturers, distributors and contractors?	
Are the risks of statewide delivery (e.g., uneven market maturity, inconsistent supply chains) outweighed by benefits of a statewide approach?	
Are there clear measurable indicators of long-term success of the energy efficiency market that can be tracked at a statewide level?	
Would statewide delivery meaningfully accelerate innovation or technology adoption compared to local implementation?	
Equity – Focuses on equity criteria population	
Would statewide delivery ensure consistent access and reduce inequities across service territories?	
Can program risks (such as differing local needs or reliance on CBOs) be managed affordably and effectively at a statewide scale?	
Are there equity specific outcomes that can be measured and reported consistently statewide?	
Has or will the program demonstrate the ability to overcome participation barriers at scale?	
Would statewide delivery expand reach and scale and benefits in a way local delivery could not?	

If majority of the answers are YES, continue onto Assessment Recommendations.

If majority of the answers are NO, consider REDESIGN, LOCALIZE, or SUNSET program

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ASSESSMENT RECOMMENDATIONS

Summary of the above scoring system, and assessment recommendation.

Suggested Program Reclassification Options

Recommendation	Description
If Section 1-5 result in YES	
Maintain or Launch Statewide	Only if program meets all core criteria and delivers value
If Section 1-5 results in NO Options below	
Redesign or Maintain as a local program	If program needs local tailoring, complexity makes it better as a local or regional offer
Sunset Program	If program is obsolete, low-performing, or creates administrative risk
Transfer to non-IOU PA or State Agency	Consider having non-IOU PAs (e.g., RENs, CCAs) or state agencies (e.g., CEC) run the program; IOU acts as fiscal agent only
Integrate into existing local programs	Fold into existing contracts/programs to improve customer experience and delivery efficiency

Compliance Check Before Final Recommendation	Yes/No
Will recommendations cause any IOU to fall below the 20% statewide funding requirement, exceed the 30% MS+E cap, jeopardize meeting the TSB goal or affect any other compliance requirement?	
If a CCA program is converted to SW, will CCA still maintain cost-effective portfolio requirement?	
CONSENSUS CHECK BEFORE SUBMITTING PROPOSAL	**Yes/No**
Was consensus reached among all PAs regarding the assessment results and proposed outcomes?	

Before proposing the assessment outcomes in the appropriate filing mechanism, the party conducting the assessment may conduct regional focus groups to gather community input across the state. These focus groups should include specific questions that guide feedback and inform the proposing PA if the SW proposal is still appropriate as designed, or redesign, localize or sunset. The results of this effort shall be reported when the party proposes the assessment outcomes in the filing process.

SELECTION/TRANSITION OF LEAD PA

Stakeholder Involvement

- Ensure a transparent and inclusive selection process by actively engaging stakeholders such as other IOUs, RENs, and CCAs.

- Solicit stakeholder feedback through options such as, but not limited to, public workshops, comment periods, or advisory panels.

Qualification Criteria:

Define clear, objective criteria for selecting the lead PA, including but not limited to:

- **Relevant Experience and Track Record:** Demonstrated history of successfully administering similar programs, including past performance metrics and lessons learned.
- **Market Expertise:** Understanding of the target market, including customer segments, supply chain dynamics, and regulatory requirements.
- **Training Infrastructure and Workforce Support:** Ability to provide training, technical assistance, and workforce development to support program delivery at scale, if needed.
- **Data Management and Reporting Capabilities:** Robust systems for data collection, analysis, and reporting, ensuring compliance with CPUC requirements and enabling transparent program evaluation and data sharing capabilities with other non-lead PAs.
- **Contract and Solicitation Resources:** Capacity to manage competitive solicitations, vendor contracts, and procurement processes efficiently and fairly.
- **Past Performance:** Evidence of meeting or exceeding program goals, maintaining compliance, and effectively managing budgets and timelines.
- **Interest and Commitment:** Clear expression of willingness and capacity to lead the statewide program, including resource allocation and organizational support.

NEW PROGRAM PA SELECTION PROCESS :

- Interested Lead PA successfully completes the assessment
- Interested Lead PA presents assessment results and proposed outcomes to all PAs[19] (*Engage in good faith effort to reach consensus among PAs)*
- Interested Lead PA proposes SW Program concept in an appropriate filing mechanism as determined by CPUC input.
- The CPUC approves or denies SW Program.

TRANSITIONING PROGRAMS PROCESS (transitioning programs):

- Current Lead PA coordinates with PAs to inform PAs of proposed transition
- Current Lead PA receives input and response to proposed transition
- Allow all PAs to submit proposals or statements of interest
- Current Lead PA engages in good faith effort to reach consensus among PAs
- Current Lead PA makes a recommendation via Tier 2 AL per D.21-06-055
- Current Lead PA announces the newly selected lead PA

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[19] D.18-05-041 at pp. 80-81 provides guidance on lead PA coordination.

Appendix A
Issues Needing Further Development and/or Clarification by the Commission

1. <u>Scope of OP 2</u>: The full scope of OP 2 was unclear to all PAs. Specifically, whether the assessment was intended to include both upleveling (local/regional to statewide) and down-leveling (SW to local/regional) of programs. While the language of OP 2 addresses the evaluation of SW programs and the related dicta[20] is suggestive of upleveling, there is no language indicative of down-leveling. The bullet points below summarize the three discrete possibilities.

- SW only [language of OP 2]
- Local/regional to SW (uplevel) [language of dicta]
- SW to local/regional (down-level)

<u>Action Item</u>: Formal Commission input warranted.

2. <u>Regulatory Process for Proposing a SW Program</u>: While PAs seek maximum flexibility in undertaking the OP 2 assessment, there is lack of clarity about the appropriate venues for doing so. While there is general consensus that the Application cycle is an appropriate venue, some PAs believe the TUAL and the MCAL could also be vehicles for advancing OP 2. Moreover, there is consideration as to whether a separate dedicated process, such a unique Tier 3 filing, could also be a viable mechanism. The one potential impediment is that in certain cases incremental funding might be necessary, which is generally requested and approved as part of the periodic EE Application. In the case of a regional or local program being converted to SW, PAs would need the appropriate venue to rebalance their remaining portfolio and address any implementation issues (see #4 below).

<u>Action Item</u>: Formal Commission input warranted.

3. <u>Applicability of dual fuel or single fuel</u>: There is a diversity of perspectives on whether the offering of dual fuel programs should be *discretionary* or *required*.

<u>Action Item</u>: Formal Commission input warranted.

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[20] *In comments on the proposed decision, numerous parties, including Oracle as one of the implementers, opposed the conversion of these two programs to statewide administration, arguing that they have unique characteristics at the individual IOU level and are not appropriate for statewide implementation. In light of these comments, we will defer on converting these programs to statewide at this time. Once a statewide assessment process has been proposed and approved, then we will use the process to evaluate whether these programs should be converted to statewide during the next portfolio application cycle.*

4. <u>Attribution:</u> It is understood that moving a local/regional program to a SW program would preclude program benefit attribution for non-IOU PAs, which presents a challenge for maintaining a cost-effective portfolio and performance at a PA level. Several solutions are available to the Commission including, but not necessarily limited to the following:

- Equal attribution of Statewide Program TSB benefits and costs to all PAs.
- Cost-effectiveness/performance adjustment or relief to impacted non-IOU PA(s).

<u>Action Item</u>: As many EE policies are impacted by potential changes in attribution, cost-effectiveness or program delivery model, the Commission should scope further discussion in R.25-04-010 (EE proceeding) – or the upcoming consolidated Business Plan Application proceeding - to ensure that any solutions are holistic and informed by the public record.

5. <u>Responsibility for Undertaking the Assessment:</u> The PAs generally agree that the assessment process is PA led, which is consistent with the informal perspective shared by Energy Division during the December 22, 2025 working group call. There were no objections to the idea that a PA could engage a third-party entity to facilitate or even to undertake such an assessment.

<u>Action Item</u>: Request Commission to affirm the assumption that the assessment process is PA driven rather than by the CPUC.

Each PAs was asked to complete a survey with the four questions shown below. Based on the results, all of the respondents selected a "Qualified Support" for the proposal. Certain PAs also provided responses to questions three and/or four. Each PA's survey response is included in this Appendix B.

1. Which Program Administrator (PA) do you represent?

> *Enter the full name of your PA (please provide one survey response per PA).*

2. Do you support the statewide assessment proposal for evaluating programs?

> *Select one option that best represents your position (please **bold** and <u>underline</u> your selection).*

- *Yes*
- *Qualified Support*
- *No*

3. If you selected "Qualified Support" or "No," briefly explain your reasoning.

> *Your explanation will help stakeholders understand your perspective.*

4. Do you have any additional comments or suggestions regarding the proposal?

> *Optional: Share any other thoughts or recommendations.*

NREN

1. Which Program Administrator (PA) do you represent?

Enter the full name of your PA (please provide one survey response per PA).

Northern Rural Regional Energy Network (NREN)

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please **bold** and <u>underline</u> your selection).

- Yes
- **<u>Qualified Support</u>**
- No

3. If you selected "Qualified Support" or "No," briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

NREN appreciates the time and effort from the PAs during this process to create a statewide portfolio assessment process. At this time, NREN would like additional clarity of certain assessment questions, and would like to review the new clean version closely.

Overall, NREN understands the assessment process and agrees with the guiding principles, but would like to reiterate the gap-filling purposes of RENs that should be kept in mind when an assessment of a regional or local program is taking place.

Additionally, NREN would like to note that not all PAs were represented throughout the entire process of developing this proposal, which may indicate unequitable representation of PAs.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

It is noteworthy that Joint Cooperation Memos (JCMs) already exist to limit program overlap and ensure PA coordination, and that regional programs all differ from each other as they are unique to each region. These JCMs and other means of coordination should be taken into account when conducting an assessment.

BayREN

1. Which Program Administrator (PA) do you represent?

 Enter the full name of your PA (please provide one survey response per PA).

BayREN

2. Do you support the statewide assessment proposal for evaluating programs?

 Select one option that best represents your position (please **bold** and <u>underline</u> your selection).

Qualified Support

3. If you selected "Qualified Support" or "No," briefly explain your reasoning.

 Your explanation will help stakeholders understand your perspective.

BayREN appreciates the participation of the PAs and the collaborative effort to produce a statewide portfolio assessment proposal. BayREN offers qualified support for the proposal and will provide more reasoning for our qualified support in our business plan application. BayREN would like more time to evaluate the proposal to determine if it agrees with what has been drafted.

4. Do you have any additional comments or suggestions regarding the proposal?

 Optional: Share any other thoughts or recommendations.

3C-REN

1. Which Program Administrator (PA) do you represent?

   Tri-County Regional Energy Network (3C-REN)

2. Do you support the statewide assessment proposal for evaluating programs?

   Select one option that best represents your position (please **bold** and <u>underline</u> your selection).

   - Yes
   - **Qualified Support**
   - No

3. If you selected "Qualified Support" or "No," briefly explain your reasoning.

   Your explanation will help stakeholders understand your perspective.

   3C-REN offers qualified support for the statewide assessment proposal and will provide more reasoning for our qualified support in our business plan application after having more time to review a clean copy. Some items we will use the additional time to review include:

   - Proposed Scope (Upleveling v. Down-leveling)
     - 3C-REN leans toward relying on the explicit decision language, which focuses on the evaluation of existing statewide programs. If the Commission ultimately relies on the dicta to support upleveling, it is important that this approach be balanced with a fair and equal pathway for down-leveling where appropriate.
   - REN programs operating in tandem with statewide programs
     - 3C-REN wants to ensure that even if a statewide program passes the assessment matrix and does not require localization, this should not preclude the continued delivery of localized programs where they improve equitable access.

4. Do you have any additional comments or suggestions regarding the proposal?

   Optional: Share any other thoughts or recommendations.

SoCalREN

1. Which Program Administrator (PA) do you represent?

Enter the full name of your PA (please provide one survey response per PA).

Southern California Regional Energy Network (SoCalREN)

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please **bold** and <u>underline</u> your selection).

- Yes
- **<u>Qualified Support</u>**
- No

3. If you selected "Qualified Support" or "No," briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

The SoCalREN believes there should be an assessment regarding the efficacy of the current statewide programs. It would benefit the state to understand are statewide program performing proportionally across the state or are their communities or pockets of regions not being reached. Are rate payer dollars being effectively utilized for mid-stream and up-stream models or is there too little oversight to understand where SW ratepayer dollars are actually being realized into impact. These are just a few questions and much more could be identified.

The SoCalREN does support some portions of the proposal for instance the gate assessment process for considering a PA's proposal for a program to be delivered statewide. However, their lacks certain nuances that must be considered. For instance in the assessment for considering a program be delivered SW there should exist a requirement that the PA engage communities in some form across the state to acquire input. Many communities are often disenfranchised by statewide programs due their standardization. In addition, SW proposals should only be considered in Applications which require Commission approval.

SoCalREN intends to file an alternate proposal that captures some of the Joint PAs work and builds off of it.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

None at this time.

MCE

1. Which Program Administrator (PA) do you represent?

    MCE

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please **bold** and <u>underline</u> your selection).

- Yes
- **Qualified Support**
- No

3. If you selected "Qualified Support" or "No," briefly explain your reasoning.

MCE does not agree with the threshold criteria for each set of scoring questions and notes that there are logical errors in the proposed thresholds. For some sets of criteria a "majority" may not be sufficient, and a program should pass all screening criteria to be considered for statewide implementation. There should be further discussion to refine the threshold criteria for each section.

Other comments will be provided in MCE's testimony.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

SDREN

1. Which Program Administrator (PA) do you represent?

San Diego Regional Energy Network

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please **bold** and <u>underline</u> your selection).

- Yes
- **<u>Qualified Support</u>**
- No

3. If you selected "Qualified Support" or "No," briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

- SDREN supports the proposal if it is not used to relitigate currently authorized programs.
- SDREN supports the proposal if it is conducted by an independent third party.
- SDREN supports the proposal if the "ratepayer affordability" language under "Guidelines for Assessment" is removed. There are many bill components that impact ratepayer affordability (e.g., generation, transmission, and distribution) so assessing singular programs using this as a guideline is infeasible. The "customer affordability" language under the "Guidelines for Assessment" section is more easily determined and can be isolated/attributed to single programs. Therefore, SDREN supports the "customer affordability" language and recommends "ratepayer affordability" be removed. Additionally, this language was added last-minute and was not discussed with the full PA group prior to including.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

I-REN

1. Which Program Administrator (PA) do you represent?

Enter the full name of your PA (please provide one survey response per PA).

Inland Regional Energy Network (I-REN)

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please bold and underline your selection).

- Yes

- **Qualified Support**

- No

3. If you selected "Qualified Support" or "No," briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

At the time of this survey I-REN offers "qualified support" rather than full support or non-support of the proposal and will provide additional detail in our forthcoming business plan application. I-REN appreciates the framework's reiteration of the guiding principles of good-faith PA consensus and coordination. While this point is identified in the overview, it is worth highlighting in these comments that the development of this proposal only included REN and CCA PAs a few months after IOUs initiated the effort exclusively. Nevertheless, I-REN participated in this effort in good faith and will continue to identify refinements to the framework to promote equity among PAs between now and the business plan application submittal.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

I-REN would like to thank all PAs involved in this effort for their contributions, and restate the importance of local and regional efforts led by RENs to provide equity communities with critical support and market access.

CCR REN

1. Which Program Administrator (PA) do you represent?

   Central California Rural Regional Energy Network (CCR REN)

2. Do you support the statewide assessment proposal for evaluating programs?

   Select one option that best represents your position (please **bold** and <u>underline</u> your selection).

   - Yes
   - **Qualified Support**
   - No

3. If you selected "Qualified Support" or "No," briefly explain your reasoning.

   Your explanation will help stakeholders understand your perspective.

   We have some small comments in the draft we would like to be considered.

4. Do you have any additional comments or suggestions regarding the proposal?

   Optional: Share any other thoughts or recommendations.

   Not at this time.

SDG&E

1. Which Program Administrator (PA) do you represent?

Enter the full name of your PA (please provide one survey response per PA).

SDG&E

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please **bold** and <u>underline</u> your selection).

- Yes
- **<u>Qualified Support</u>**
- No

3. If you selected "Qualified Support" or "No," briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

The requirement that PAs conduct regional focus groups to gather community input, as proposed by SCR, should be optional rather than mandatory, as regional focus groups may not be practical on a statewide basis.

The proposed transition of a statewide lead PA is also allowed to be requested within the Business Plan Applications per the Energy Division template, not only Tier 2 Advice Letter.

Already resolved in the draft: SDG&E supports majority versus 80% supermajority within the gating questions.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

SCE

1. Which Program Administrator (PA) do you represent?

Southern California Edison

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please **bold** and underline your selection).

- Yes
- **Qualified Support**
- No

3. If you selected "Qualified Support" or "No," briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

SCE is generally supportive of the Statewide Assessment proposal; however, SCE emphasizes that this assessment should include regional programs and notes that the assessment should not be used as a basis for program closures, as an established process and procedure for closing programs already exists.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

SoCalGas

1. Which Program Administrator (PA) do you represent?

> Enter the full name of your PA (please provide one survey response per PA).

> SoCalGas

2. Do you support the statewide assessment proposal for evaluating programs?

> Select one option that best represents your position (please **bold** and <u>underline</u> your selection).

- Yes
- **Qualified Support**
- No

3. If you selected "Qualified Support" or "No," briefly explain your reasoning.

> Your explanation will help stakeholders understand your perspective.

4. Do you have any additional comments or suggestions regarding the proposal?

> Optional: Share any other thoughts or recommendations.

The proposal should heavily weigh the customer's best interest and provide the structure to allow utilities to adapt program designs for customer benefit.

PG&E

1. Which Program Administrator (PA) do you represent?

PG&E

2. Do you support the statewide assessment proposal for evaluating programs?

Select one option that best represents your position (please bold and <u>underline</u> your selection).

- Yes
- **<u>Qualified Support</u>**
- No

3. If you selected "Qualified Support" or "No," briefly explain your reasoning.

Your explanation will help stakeholders understand your perspective.

There are unresolved issues that merit further development and/or formal CPUC input. These are noted in the body of the proposal (primarily as footnotes) and/or summarized in Appendix A.

PG&E's perspective continues to be that the lead-PA of any SW program should have the ability to make program specific decisions, specifically allowing the lead-PA to determine whether a SW program is single or dual fuel. PG&E provides additional context in its testimony.

PG&E requests stakeholders consider this perspective when reviewing the proposal.

4. Do you have any additional comments or suggestions regarding the proposal?

Optional: Share any other thoughts or recommendations.

PG&E volunteered to facilitate this all-PA process as it wasn't obvious if any other PA had interest in doing so. It is understood that efforts of this nature, which involve a dozen PAs is both challenging and time consuming. In hindsight this process would have been better suited to a professionally facilitated working group, which could have included formal workshops with Energy Division staff participation. Even so, PG&E appreciates ED staff joining one of our weekly meetings on December 22, 2025, in order to entertain PA questions and to share *unofficial* thoughts on OP 2. Also, PG&E appreciates the collaborative engagement by the PAs.

PG&E believes this proposal is a reasonable starting point for further development by the Commission and interested stakeholders. Further discussion and context on the unresolved items is located in PG&E's testimony.

APPENDIX D

OP 23 DEMOGRAPHIC DATA REPORT

Background

D.23-06-055 OP 23 requires "Portfolio administrators shall work with the Reporting Policy Coordination Group to jointly submit a report addressing the demographic questions in Section 7.7 of this decision by no later than September 1, 2025. Based on analysis included in the report, the portfolio administrators shall propose, in their next portfolio proposals due in 2026, their preferred approaches to regular reporting of demographic energy efficiency program participation information."

Questions within Section 7.7 include:

1. What are the most feasible options to accurately assess energy efficiency program participation by different demographic groups? Are there more efficient or less costly methods (i.e., using geographic, census, survey, or other data) of regularly assessing demographic participation in energy efficiency programs compared to collecting information from each program participant?
2. What, if any, demographic data is already being collected (and for which programs)?
3. What types of demographic data could be collected for energy efficiency program participation?
4. For which segments, sectors, and programs should this data be collected?
5. Where should this data be reported and stored?
6. What should be the timeline for PAs to begin reporting participation by demographic group?
7. What should the frequency be for reporting demographic participation data?

Process

To undertake this process, the Reporting PCG was engaged at the January 2025 meeting, and was provided information on OP 23, which requires a joint report. The following steps were identified to produce the OP 23 report:

Step 1: Establish a separate Reporting PCG working group to develop the report. PG&E was the lead PA in facilitating the working group.

Step 2: Have a kick-off meeting to discuss the requirements of OP23 and establish the process. Meet monthly thereafter.

Step 3: Develop a data collection template to collect each PA's response to each question.

Step 4: Discuss areas of consensus and non-consensus to find common ground.

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Step 5: Review a draft of the report with the Reporting PCG at the June 2025 PCG meeting.
Step 6: Report is finalized by the lead and sent to PAs and Energy Division Staff.

PA Responses

Each PA's individual responses to the questions are provided in excel attachment "D.23-06-055 OP23 PA Data Collection.xlsx." A summary where PAs had consensus and where differing viewpoints occurred is provided in the discussion below.

Discussion

1. What are the most feasible options to accurately assess energy efficiency program participation by different demographic groups? Are there more efficient or less costly methods (i.e., using geographic, census, survey, or other data) of regularly assessing demographic participation in energy efficiency programs compared to collecting information from each program participant?

The majority of PAs agree that using geographic and publicly available data is a cost-effective and scalable method for assessing energy efficiency program participation by demographic groups. They emphasize that demographic data collection should be voluntary and not a requirement for program participation. One way to achieve this is for PAs to provide the census tract for each project as part of the site information in CEDARS[1] claims. This approach avoids adding survey burdens to PAs and leverages existing data, such as census tracts and utility account information, to analyze demographic participation without requiring new or invasive data requests from customers. As an additional data collection method, NREN suggests gathering demographic data through registration questions, surveys, and market assessments but acknowledges the limitations of low response rates.

While CCRREN agrees with using geographic and publicly available data, they suggest using mapping software to layer addresses on census tracts and propose that demographic data collection be included in EM&V study workplans. 3C-REN supports CCRREN's approach for programs that already collect addresses, noting that collecting clean address data for programs that do not already collect it, such as workforce programs, could require a significant timeline.

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Lastly, SCE argues that using public demographic data cannot accurately assess the actual breakdown of participants. Instead, they advocate for direct data collection or sampling if an individual breakdown of participants is required by the CPUC. SoCalREN also agrees with SCE's position and are also advocating for direct data collection or sampling if an individual breakdown of participants is required.

2. What, if any, demographic data is already being collected (and for which programs)?

As this is program specific, please refer to the attached spreadsheet for each PA's response.

3. What types of demographic data could be collected for energy efficiency program participation?

PAs are mostly aligned on the types of demographic data that could be collected including customer IDs for participating customers that can be linked to geographical and other customer information such as rate code, CARE/FERA/ESA participation, NEM participation, census block group, preferred billing language, dwelling types, service types, and annual usage amounts. The census block group data point can be used to further link to disadvantaged community status, overall census data, average community incomes, and average age and race demographics within a given community. SoCalREN notes that census data can provide extensive insights into where projects are being implemented and helps identify which communities benefit most from the programs. There is also a consensus on the need for voluntary surveys to avoid creating barriers to participation.

CCRREN emphasizes that demographic data beyond what is currently required for participation in various programs should be collected during EM&V and be defined and agreed upon in the approved EM&V work plan. SCE believes that any demographic data could be requested but notes that verifying and trusting the collected data is a challenge and could lead to reduced participation. Lastly, SDG&E adds that additional data collection should only occur for local and regional programs participants, not statewide participants.

4. For which segments, sectors, and programs should this data be collected?

PAs agree that demographic data is most applicable to analyze Residential, Public, and Commercial Programs. 3C-REN, SDREN, SoCalREN, BayREN, NREN, and I-REN include Workforce Education & Training (WE&T) programs in their scope. 3C-REN highlights that customer IDs might not be applicable for WE&T programs where participants register for

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[1] California Energy Data and Reporting System: Home - CEDARS

classes without providing utility customer IDs. PG&E also notes that they do not currently report participants of WE&T programs into CEDARS.

CCRREN offers caution in the approach for commercial and public sectors, stating that demographics of those entities must be tailored to their organizational structure to mitigate data on the individual. In addition, CCRREN suggests that data should be collected during EM&V starting with the residential sector and expanding to commercial and public sectors in a phased-out approach.

Lastly, PG&E notes that demographic analysis may provide little insight within programs with randomly selected treatment and control groups (such as home energy reports) but that including these programs can be useful for analyzing groups at the portfolio level.

5. Where should this data be reported and stored?

PAs agree that required data points should be collected in claims and emphasize the importance of minimizing changes to the current reporting process. There is also consensus around collecting minimal information like census block groups that can later be tied to other demographic information by evaluators. SDG&E suggests that the new proposed Site Information data could be used to enhance CEDARS visualizations and improve access to program performance data.

CCRREN recommends that demographics collected during EM&V should be stored using existing structures to link values to claims data. They advise against adding additional reporting data points, arguing that site and participant addresses can be easily mapped onto census tract polygons. They believe that the benefits of collecting and reporting census tract data in claims data do not justify the costs to ratepayers, especially since this mapping can be done at scale afterward. Finally, I-REN, BayREN, CCRREN, 3C-REN, and NREN assert that the responsibility for mapping addresses to census tracts should lie with the CPUC, not the PAs.

Lastly, SoCalREN does not agree that the responsibility for mapping addresses to census tracts should lie with the CPUC. Census tract data is publicly available and there are many existing tools that can be leveraged that are specific to PA service territory. PAs should be responsible for this type of data mapping and reporting.

6. What should be the timeline for PAs to begin reporting participation by demographic group?

There is broad alignment that PAs should report demographic group participation only after clear CPUC guidance and 6 months to implement new collection processes. SoCalREN notes that if their recommendation to use existing PII for demographic assessment is

[1] California Energy Data and Reporting System: Home - CEDARS

adopted, an added benefit would be the ability to apply a consistent methodology across PAs and over time to claims from previous years, with no additional effort required from PAs. SCE believes the timeline for PAs to begin reporting should coincide with the next available Application period and the requirements and guidance should be included in the Decision for that Application period to ensure consistency throughout the application period. Lastly, CCRREN states that no additional demographic information or timelines are necessary if their recommendations are adopted.

7. What should the frequency be for reporting demographic participation data?

PAs agree that annual reporting for metrics and quarterly reporting for claims related data should be sufficient. If CCRREN's recommendations are adopted, where Site Address is used to map against census tract data in aggregate and additional demographics are collected during EM&V, no further demographic information is needed, and therefore no specific timelines are applicable. 3C-REN is in support of CCRREN's recommendation for programs that already collect addresses, but notes that this is not possible for programs that do not already collect address information or collect address information that is not reported into CEDARS (e.g., for WE&T and C&S participants).

Conclusion

The PAs thank the CPUC for the opportunity to provide feedback on this important issue. We collectively would like to ensure that the path taken provides (1) the most consistent method for tracking this information among PAs' programs and (2) that any data collected is done in an administratively responsible manner, to maximize the value to ratepayers. The PAs request the CPUC will continue to engage with the Reporting PCG as policy around this topic is developed.

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[1] California Energy Data and Reporting System: Home - CEDARS

Deadline	Date
1st WG Meeting (discuss questions & PG&E draft answers)	Monday, March 17, 2025
Draft excel responses due from all PAs	Monday, April 14, 2025
2nd WG Meeting (discuss consolidated PA answers and find common grounds / areas of disagreement)	Monday, April 21, 2025
1st Draft report posted by PG&E	Monday, May 5, 2025
3rd WG Meeting (discuss draft report concerns)	Monday, May 19, 2025
2nd Draft report posted by PG&E	Wednesday, June 4, 2025
Discuss 2nd draft with broader reporting PCG	Thursday, June 5, 2025
4th WG Meeting (discuss PCG feedback, attempt to finalize report)	Monday, June 16, 2025
Final Draft Posted	Tuesday, July 15, 2025
Filing	Monday, September 1, 2025

Question 1:	What are the most feasible options to accurately assess energy efficiency program participation by different demographic groups? Are there more efficient or less costly methods (i.e., using geographic, census, survey, or other data) of regularly assessing demographic participation in energy efficiency programs compared to collecting information from each program participant?
PA	**Response**
3C-REN	3C-REN agrees that customer demographic data should be voluntary and not a requirement for program participation. 3C-REN recommends using geographic and census-based analysis to not add the addition of survey burden to PAs. This geospatial data for each customer could be added in the comments section of CEDARS claim reporting or preferably as a seperate field. The limitation of this approach is that customer-level data would not be available. It is also important to note that certain program types like NMEC roll up claims and report them in aggregate to CEDARS. Addresses would need to be geocoded before savings are aggregated.
Ava	
BayREN	The least costly option would be to assess demographic participation at the census tract level. PAs already report addressess as part of the PII submission, and those addresses could be matched to census tracts and the demographics of census tracts analyzed in a systematic way. Because PAs already provide these data, assessment could be done most efficiently post-submission by a CPUC GIS consultant or similar position with no additional cost to PAs. Other data already reported that could be helpful in this assessment would be equity participation overlayed with the census tract demographics. For example, if a census tract has 20% non-English speaking households and residential programs are reporting 5% non-English speaking participation, additional outreach may be worth considering.
CCRREN	CCR REN agrees with PGE's recommendations while noting that with the reporting of site/customer address, Census Tract reporting through CEDARS is not needed. Site/Participant addressess can be layered on-top of census tract polygons in most mapping software solutions thus reducing additional costs to PAs and to their consultants and 3rd party implementers. Lastly, CCR REN agrees that without having both participant and non-participant data, the exercise may not be very useful in determining group differences. To overcome this potential challenge, CCR REN recommends considering adding demographic data collection to EM&V study workplans and in those plans, the EM&V consultants should also consider collecting representative samples of both participant and non-participant groups through robust survey mehtodology using the Dillman Tailored Design Method. EM&V should use models that are academcially robust while being empowered to reject any inference should the samples be insufficient to make any statement regarding group difference.
IREN	Indirect data collection may be the most effective as it is considered less invasive. More personal data may be expected less frequently.
MCE	MCE agrees that using geographic and publicly available data is a cost-effective and scalable way to assess demographic participation in energy efficiency programs. This method does not require any new or invasive data requests from customers. Participation in programs should not be conditioned on providing demographic information, and any analysis is done using existing utility account data.
NREN	The most feasible options to assess energy efficiency program participation by different demographic groups is by gathering demographic data for those using NREN's resources. This can be as registration questions for training and workshops, post participation surveys, or data collection on NREN's website. Since demographics questions are often optional and survey response rates are usually low in our region, this may not lead to accurate data. A Market Assessment Survey would also allow demographic data to be collected.
PG&E	The less costly and recommend method is to use publicly and other readily available data to generalize the participating demographics of individual programs. One way to do this would be for portfolio adminstrators to provide the census tract for each project as part of the Site information provided in CEDARS claims. This census tract could be used in evaluation for matching up demographic averages from the census data. The advantages of this are: low cost, no personally identifying information required, and readily available data that can help determine if EE programs are appropriately serving tracts that have more underserved groups. The disadvantage is individual customers demographics will not be known, and there will be no data to support if the EE program is supporting demographics within a tract similarly to how they are normally distributed. On top of census demographic data, PG&E can also provide other information like CARE or FERA status, ESA status, Medical Baseline Status, Tribal designations, NAICS codes of businesses, and dwelling types. In the event that individual data collection is asked for - PG&E's position is we can only request information from the customer but that they can opt out of providing it and it will not be a pre-requisite to participating in our programs. Depending on the amount of customers that opt out, and if they tend to opt out more in certain demographics, this could make the data not very useful.
SCE	No public demographic data would be able to accurately assess the actual breakdown of participants. The only way would be to require data collection or do sampling in evaluation studies based on the public census data
SCG	While SCG agrees with the method provided by PG&E, it is beneficial to use the "Targeting" method that uses all the data available includng the Census data and CEDARS to find the best applicant for each program.
SDG&E	SDG&E concurs with PG&E's response. Additionally, SDG&E wants to clarify that additional data provided would be specific to local/regional program participants.
SDREN	Publicly and other readily available data is the most feasible option. Collecting data directly from customers may be less feasible; however, it is valuable data to obtain – particularly if sufficient data can be collected to generate a statistically significant sample size. If/when doing so, PAs should try to follow the principles of data equity (e.g., allow for cultural modifications to standard data collection tools, analysis, and sharing, facilitate data sovereignty by paving the way for communities to govern the collection, ownership, dissemination and application of their own data). The Distributional Equity Analysis for Energy Efficiency and Other Distributed Energy Resources lists some of these principles on page 54. While this prompt does not speak to distributional equity analyses specifically, it's good practice and may facilitate data collection in such a way that yields higher response rates. Additionally, it could help facilitate distributional equity analyses PAs and/or the CPUC may want to explore in the future, as recently discussed in the April 20th CPUC workshop titled DER Cost-Effectiveness Workshop: Guiding Principles, Addressing Equity Concerns and Changes to the Biennial Update Process for the ACC. Returning to the suggestion of publicly available data, examples of national public data sources that can be accessed at no-cost include: - U.S. Bureau of the Census and Bureau of Labor Statistics - Current Population Survey, County Business Patterns, Statistical Abstracts Series (Annual government publication that contains social and economic statistics for the U.S. and selected international data. Data are retrievable from numerous tables which are divided into subjects such as population, vital statistics, education, energy and agriculture.) - Social Security Administration - U.S. Citizenship and Immigration Services - The White House Briefing Room (Good source for locating popular economic and demographic information available from various government agencies.) - National Center for Health Statistics - Vital Statistics of the United States (Contains data on health reports that can be used to inform other challenges facing target populations and addressed by energy improvements)
SoCalREN	SoCalREN concurs with PG&E that the more cost-effective approach is to assess demographics based on claim site data. We recommend that ED utilize the addresses already submitted in the claims PII to assign projects to appropriate census tracts and assess demographics based on those tracts. While a participant survey may be a feasible option, we are concerned that requesting additional information from participants could create an additional barrier to participation, particularly among residential and WE&T participants. Furthermore, if responses are voluntary and not required for participation, there is a risk that the data may not be representative of the broader populations being served.
PCE	Most cost effective and feasible option is geographic data based on addresses, and income based on the participation low-income program such as CARE, FERA or Medical Baseline. Mapping customer addresses can better determine which census tract they are in, and is more accurate. Mapping is affordable and simple to do. Other options such as accessing census & income data are far less feasible as this data isn't readily accessible to us. Using census data on its own or in combination with participation of at least one low-income program is one of the more accessible ways for us to determine if a customer is vulnerable or low-income.

PA	Program Name	Region	Language	Ethnicity/Race	Disability	Tribal	Income	Additional Notes on Demographic Data Collected	Data Anonymized	Comments
PG&E	SW Residential New Construction - California Energy Smart Homes Program (CESHP) | SW_NC_Res_electric	☑	☐	☐	☐	☐	☐	Business Name, First Name, Last Name, Address, Phone, Email	No	
PG&E	SW Non-Residential New Construction - California Energy Design Assistance (CEDA) | SW_NC_NonRes	☑	☐	☐	☐	☐	☐	First Name, Last Name, Customer ID, Email, Phone, Project Address, Utility Provider, Building Type	No	
PG&E	Compliance Improvement | PGE21053	☑	☐	☐	☐	☐	☐	1. We collect addresses for Energy Code Ace training participants. 2. We collect zip codes when someone uses the Energy Code Ace Virtual Compliance Assistant (VCA) to complete nonresidential compliance forms.	No	
PG&E	HomeIntel PGE_Res_001b	☑	☑	☐	☐	☐	☐	Region: via address collection. Language: customers can select Spanish language option in the process.	No	
PG&E	Electrification Pilots (Empower My Home, Powerful Neighborhoods, Electrify My Block) PGE_Res_004a, PGE_Res_004b, PGE_Res_005	☑	☑	☐	☐	☐	☑	Region: Via the address. Income: Customers will self-attest yes or no as to whether they meet the income requirements of below 400% of FPG. Language: Customers will self-attest yes or no as to whether they speak English or not.	No	
PG&E	WE&T IEET Trainings SW_WET_Work, SW_WET_CC	☑	☑	☐	☐	☐	☐	Address, City, Company, First Name, Full Name, Home Zip Code, Language, Last Name, Mobile, Occupation, Zip Code	No	We don't anonymize the data because we need the usernames for the DAC workers analysis.
PG&E	All Other Downstream Programs	☑	☐	☐	☐	☐	☐	Collect customer ID.	Yes	
SCE	All Programs reported at a customer level	☑	☐	☐	☐	☑	☑	SCE's customer data does include the information. Income would only be collected if they are trying to qualify for an Equity or Income-Qualified program	No	
NREN	Residential Resource Acquisition	☑	☑	☐	☐	☐	☐	Residential Resource Acquisition Metric: percent of services rendered to hard-to-reach, disadvantaged, disinvested, and underserved customer. -Track geographic location, household income, primary language, and housing type.		NREN is not yet gathering demographic data, however once its programs launch, each program will be gathering demographic data. To track participants in DAC or underserved communities, NREN will gather the geographic location of the participants and
NREN	Commercial Resource Acquisition	☑	☑	☐	☐	☐	☐	Commercial Resource Acquisition Metric: Services to HTR, disadvantaged, and underserved customers exceed 70% of all rendered services. -Track geographic location, primary language, business size, and leased or rented facilities.		NREN is not yet gathering demographic data, however once its programs launch, each program will be gathering demographic data. To track participants in DAC or underserved communities, NREN will gather the geographic location of the participants and
NREN	Codes & Standards	☑	☐	☐	☐	☐	☐	Codes & Standards: targets and serves disadvantaged and underserved communities. -Track geographic location		NREN is not yet gathering demographic data, however once its programs launch, each program will be gathering demographic data. To track participants in DAC or underserved communities, NREN will gather the geographic location of the participants and
NREN	Public Equity	☑	☐	☐	☐	☐	☐	Public Equity: targets and serves disadvantaged and underserved communities. -Track geographic location		NREN is not yet gathering demographic data, however once its programs launch, each program will be gathering demographic data. To track participants in DAC or underserved communities, NREN will gather the geographic location of the participants and
NREN	Workforce Education & Training	☑	☑	☐	☐	☐	☑	Workforce Education & Training: designed to reach disadvantaged workers, located in HTR, low-income, and tribal communities. -Track geographic location, household income, primary language, and housing type.		NREN is not yet gathering demographic data, however once its programs launch, each program will be gathering demographic data. To track participants in DAC or underserved communities, NREN will gather the geographic location of the participants and
NREN	Finance Program	☑	☑	☐	☐	☑	☑	Finance Program: designed to reach disadvantaged workers, located in HTR, low-income, and tribal communities. -Track geographic location, household income, primary language, and housing type.		NREN is not yet gathering demographic data, however once its programs launch, each program will be gathering demographic data. To track participants in DAC or underserved communities, NREN will gather the geographic location of the participants and
NREN	Residential Equity	☑	☐	☐	☐	☐	☐	Residential Equity: create additional opportunities for disadvantaged workers. -Track geographic location		NREN is not yet gathering demographic data, however once its programs launch, each program will be gathering demographic data. To track participants in DAC or underserved communities, NREN will gather the geographic location of the participants and
SDREN	N/A (SDREN does not currently have any programs)	☐	☐	☐	☐	☐	☐	N/A	N/A	N/A
SDG&E	4184- Non-Residential Behavioral Program Business Energy Reprots (BER)	☐	☐	☐	☐	☐	☐			

PA	Program Name	Region	Language	Ethnicity/Race	Disability	Tribal	Income	Additional Notes on Demographic Data Collected	Data Anonymized	Comments
SDG&E	4040- Home Energy Audits and Reports (HEAR)	☐	☐	☐	☐	☐	☐			
SDG&E	4178 - COM SW-HVAC Program	☐	☐	☐	☐	☐	☐	This midstream program only collects end-user: Address, Business Name, First Name, Last Name, Email address and Phone number. The Language, Ethnicity/Race, Disability, Tribal and Income are NOT collected from End-User or participating Distributors.	No	There are no responses and the matrix checkboxes are left BLANK, please reference the Additional Notes column.
SDG&E	4179 - RES SW-HVAC Program	☐	☐	☐	☐	☐	☐	This midstream program only collects end-user: Address, First Name, Last Name, Email address and Phone number. The Language, Ethnicity/Race, Disability, Tribal and Income are NOT collected from End-User or participating Distributors.	No	There are no responses and the matrix checkboxes are left BLANK, please reference the Additional Notes column.
SDG&E	4168 - GRID – Lodging Program	☐	☑	☐	☐	☐	☐	This commercial program has not yet been setup in EECP although the responses are based on projected data that will be captured in support of identifying customer as HTR and part of DAC communities. Additionally, the GRID-Lodging would not pursue projects on TRIBAL lands as those are FEDERAL customers and do not qualify for the GRID-Lodging program.		
SDG&E	4174 - Workforce Education & Training Program	☐	☐	☐	☐	☐	☐	First Name, Last Name, Customer ID, Email, Phone, Zip Code, Career Choice, Disadvantaged Worker Attestation (yes/no)	No	All classes are in English, some classes are in Spanish, but no question is asked of preferred language.
SDG&E	4136 - Statewide Residential HVAC QIQM	☐	☐	☐	☐	☐	☐			
SDG&E	3226 - Business Energy Solutions	☐	☑	☐	☐	☐	☐	Tribal customers are not eligible for this program.		
SDG&E	4169 - Groceries, Restaurants, and Food Storage	☐	☑	☐	☐	☐	☐	Tribal customers are not eligible for this program.		
SDG&E	4170 - SD Energy Edge (Retail, Office, Wholesale Program)	☐	☑	☐	☐	☐	☐	Tribal customers are not eligible for this program.		
SDG&E	4176- Residential Equity Education & Outreach	☑	☐	☐	☐	☐	☐	Region via the address collection.		
SDG&E	4173- Small Business Outreach	☐	☑	☐	☐	☑	☐			
SDG&E	4166 - Statewide Plug-Load and Appliance Program (SW-PLA)	☐	☐	☐	☐	☐	☐	This midstream program only collects end-user: Address, First Name, Last Name, Email address and Phone number. The Language, Ethnicity/Race, Disability, Tribal and Income are NOT collected from End-User or participating Distributors.	No	There are no responses and the matrix checkboxes are left BLANK, please reference the Additional Notes column.
SDG&E	4001 - Residential Energy Solutions (RES)	☐	☑	☐	☐	☐	☑	Customer attests if english is a second language and their care/fera status. Tribal customers are not eligible for this program.	No	
SDG&E	4002 - Residential Zero Net Energy Transformation (RZNET)	☐	☑	☐	☐	☐	☑	Customer attests if english is a second language and their care/fera status. Tribal customers are not eligible for this program.	No	
SDG&E	4012 - SD EnergyLink	☐	☑	☐	☐	☑	☑	The federal program serves all federal and tribal customers, both residential and non-residental. Therefore, customer attests if english is a second language, their care/fera status, and indicate Native Tribe if applicable.	No	
SDG&E	4197 - Market Access Program - Residential	☐	☐	☐	☐	☐	☐	Language, Ethnicity/Race, Disability, Tribal and Income are not currently collected.	No	For 2025 program year, the program plans to collect data to indicate HTR status
SDG&E	4198 - Market Access Program - Commercial	☐	☐	☐	☐	☐	☐	Language, Ethnicity/Race, Disability, Tribal and Income are not currently collected	No	For 2025 program year, the program plans to collect data to indicate HTR status

PA	Program Name	Region	Language	Ethnicity/Race	Disability	Tribal	Income	Additional Notes on Demographic Data Collected	Data Anonymized	Comments
SDG&E	4168 - GRID –PIH	☐	☑	☐	☐	☐	☐	This commercial program has not yet been setup in EECP although the responses are based on projected data that will be captured in support of identifying customer as HTR and part of DAC communities. Additionally, the GRID-Lodging would not pursue projects on TRIBAL lands as those are FEDERAL customers and do not qualify for the GRID-Lodging program.		
SoCalREN	Public Agency Revolving Loan Fund	☑	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Energy Efficiency Project Delivery Program	☑	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Distributed Energy Resource Disadvantaged Communities Program	☑	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Public Agency NMEC Program	☑	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Streamlined Savings Program	☑	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Energy Resiliency Action Plan	☑	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Rural-Hard to Reach Direct Install	☑	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses, install energy efficiency measures, and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Water Infrastructure Program	☑	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Water/Wastewater Strategic Energy Management	☑	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Underserved Schools Strategic Energy Management	☑	☐	☐	☐	☐	☐	We collect facility address (including zip codes) to provide site-level project analyses and assess whether a facility meets the CPUC definition of hard to reach or underserved.	N	While we do not anonymize data, we store facility data in a private and secure customer relationship management platform.
SoCalREN	Multifamily Program	☑	☑	☐	☐	☑	☑	We collect income information on properties through CalEnviroScreen but also request property's deed restrictions, or rent rolls or other documentation to show low income status. Langauge information is collected on our intake form, which is our property audit document for the	Yes	
SoCalREN	Residential Kits4Kids	☑	☐	☐	☐	☐	☐	We do not collect personal identifiable information from the students. We collect data on schools and their demographics. We provide materials and post cards in Spanish.	yes	
SoCalREN	ACES Pathway	☑	☑	☑	☑	☐	☑	• In addition to the provided fields, ACES is currently tracking gender as part of its demographic data collection. • ACES does not collect individual student family income data. Instead, economic status is determined using the school's Title I designation (indicating that at least 80% of students qualify for	Demographic data for the ACES program is tracked	Physical disability (FGLS and fieltrips) Learning disability (Program Application)
SoCalREN	Green Path Careers	☑	☑	☑	☐	☐	☐	In addition to the provided fields, GPC is currently tracking gender as part of its demographic data collection.		
SoCalREN	WE&T Opportunity HUB	☐	☐	☐	☐	☐	☐			Program not officially launched as of April 2025
SoCalREN	Agriculture WE&T	☐	☐	☐	☐	☐	☐			Program not officially launched as of April 2025

PA	Program Name	Region	Language	Ethnicity/Race	Disability	Tribal	Income	Additional Notes on Demographic Data Collected	Data Anonymized	Comments
SoCalREN	E-Contractor Academy	☑	☑	☑	☐	☐	☐	• In addition to the provided fields, ECA is currently tracking gender as part of its demographic data collection. • ECA collect business income (revenues) for contractors through the program enrollment application and gather additional details during the assessment process.		
BAY	Single Family	☑	☑	☐	☐	☐	☑		No, we record this info per participant.	We will be collecting preferred language and what income bands participants fall into ($20k bands up to ~$220k/year) but not specific household income values. Each project will have an associated address, so I assume yes for region.
BAY	Multi Family	☑	☐	☐	☐	☐	☐	Region is always Bay Area, we track all projects' physcal addresses and the mailing addresses of those receiving the rebate check. Income is not directly tracked at the project level but is tracked on average at the census level in which the project is located as it informs eligiblity for our housing burden multiplier. Relatedly, in a post-install tenant/renter survey we selectively administer, we ask	No, we record this info per participant (re "Region")	
BAY	Codes and Standards Program	☑	☐	☐	☐	☐	☐	We track the geographic locations of Codes & Standards participants, together with basic identifying data (names and email addresses).	We record the data per participant & report by	The Codes & Standards program's target audience is local governments, and therefore we do not collect demographic data other than location, focusing on which jurisdictions are participating in the program.
BAY	Water Upgrades Save	☑	☐	☐	☐	☐	☐	Participant addresses are captured.	No	
BAY	Commercial	☑	☑	☐	☐	☑	☐	Region is always Bay Area. As part of hard-to-reach eligibility, we track whether English is the primary language or not, but not the specific language. As part of hard-to-reach/underserved eligibility, we collect whether a business is located on CA Native American Tribes' territory. We collect whether the business is owned/operated by a CA Native American Tribe or Tribe Member	No, we record this info per participant.	
BAY	Green Labeling	☑	☐	☑	☐	☐	☐	We also collect age and gender identify. All demographic responses are optional.	No, collected at registration	Data collected for real estate training registrations, no demographic data collected for Home Energy Score.
BAY	Climate Careers	☑	☑	☑	☑	☐	☑	We gather all demographic data mentioned except for tribal information. This is true for Green House Call clients and youth participants. For youth recruitment, we do not ask disability status before hiring. During our pre-program survey (once youth are hired), we ask youth participants to disclose disability so that we can support them during the program, if support is needed. All	No	
BAY	Refrigerant Replacement	☑	☑	☐	☐	☑	☐	Region is always Bay Area. As part of hard-to-reach eligibility, we track whether English is the primary language or not, but not the specific language. As part of hard-to-reach/underserved eligibility, we collect whether a business is located on CA Native American Tribes' territory. We collect whether the business is owned/operated by a CA Native American Tribe or Tribe Member	No, we record this info per participant.	
BAY	Integrated Energy Services	☑	☐	☐	☐	☐	☐	Region is just the Bay Area. Data collected includes jurisdictions that participate in IES program along with staff names and contact info.	No	
BAY	Targeted Decarbonization Services	☑	☐	☐	☐	☐	☐	Region is just the Bay Area. Data collected includes jurisdictions that participate in TDS program along with staff names and basic contact information.	No	
PCE	DAC-GT	☑	☐	☐	☐	☐	☐	Address, City, First and Last Name, Zip Code, Census Tract, Rate Code		
PCE	FLEXMarket	☑	☐	☐	☐	☐	☐	Region: via the address	No	
SCG	SCG3702 Residential Energy Efficiency Program (Resource)	☑	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3958 Residential Energy Efficiency Program (Equity)	☑	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3935 Residential Advanced Clean Energy Program (Equity)	☑	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3883 Residential Advanced Clean Energy Program (Resource)	☑	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		

Question 2:	What, if any, demographic data is already being collected (and for which programs)?									
PA	Program Name	Region	Language	Ethnicity/Race	Disability	Tribal	Income	Additional Notes on Demographic Data Collected	Data Anonymized	Comments
SCG	SCG3861 Community Language Efficiency Outreach Program	☑	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3884 Comprehensive Manufactured Homes Program	☑	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3885 Manufactured Home Program	☑	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3705 Multifamily Whole Building Program (Equity)	☑	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3938 Multifamily Whole Building Program (Resource)	☑	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3889 Multifamily Energy Alliance Program (Resource)	☑	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG Multifamily Energy Alliance Program	☑	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address and email.		
SCG	SCG3829 SoCalGas Marketplace	☑	☐	☐	☐	☐	☑	Income collected for select customers using California Go Green Financing. This was about 300 transactions for 2024. Region (zip code) data collected for all customers making a purchase.	No	
SCG	SCG3890 Agriculture Energy Efficiency	☑	☑	☐	☐	☑	☐	Programs collect customer ID information, i.e. business name, account number, phone number, address, email, gas bill, installation site point of contact (Name, phone number, Email, Title)	No	if applicable, tribal information is collected as a way to qualify a customer for HTR/DAC. Language data collected is % of non english speaking workers on site and not tied directly to account holder (HTR/DAC qualifier)
SCG	SCG3882 Small Medium Business Program	☑	☑	☐	☐	☐	☐	Business name, account number, phone number, address, email, gas bill, installation site point of contact (Name, phone number, Email, Title)	No	
SCG	SCG3937 Small Medium Business Program - Equity	☑	☑	☐	☐	☐	☐	Business name, account number, phone number, address, email, gas bill, installation site point of contact (Name, phone number, Email, Title)	No	
SCG	SCG3887 Commercial Building Energy Solutions And Technologies (C-BEST) Program	☑	☑	☐	☐	☐	☐	Business name, account number, phone number, address, email, gas bill, installation site point of contact (Name, phone number, Email, Title)	No	
SCG	SCG3940 Commercial Building Energy Solutions And Technologies (C-BEST) Program - Equity	☑	☑	☐	☐	☐	☐	Business name, account number, phone number, address, email, gas bill, installation site point of contact (Name, phone number, Email, Title)	No	
SCG	SCG3886 Public Direct Install Program	☐	☐	☐	☐	☐	☐	Business Name, First Name, Last Name, Address, Phone, Email	No	
SCG	SCG3899 Large Public Sector Program	☑	☐	☐	☐	☑	☐	Business Name, First Name, Last Name, Address, Phone, Email,DAC/HTR	Yes	EIP Collects data by direct outreach through email, phone call, face to face meeting to identify qualified customers and facilities for the LPS Program, EIP Follows all SoCalGas Customer data policy and handling, and we do not share or sell our customer
SCG	SCG3956 K-12 Public Schools Program	☐	☐	☐	☐	☐	☐	Business Name, First Name, Last Name, Address, Phone, Email	No	
SCG	SCG3942 Industrial STAR	☑	☑	☐	☐	☐	☐	Business name, account number, phone number, address, email, gas bill, installation site point of contact (Name, phone number, Email, Title)	No	Data is only collected if the business may potentially qualify as HTR.

PA	Program Name	Region	Language	Ethnicity/Race	Disability	Tribal	Income	Additional Notes on Demographic Data Collected	Data Anonymized	Comments
SCG	SCG3944 RGEEP	☑	☐	☐	☐	☐	☐	Business name, account number, phone number, address, email, gas bill, installation site point of contact (Name, phone number, Email, Title)	No	
SCG	SCG3909 Business Energy Efficieny Surveys	☑	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address, email, gas bill		
SCG	SCG3911 Non Residential Incentive Deemed (EERB)	☑	☐	☐	☐	☐	☐	Programs collect customer ID information, i.e. name, account number, phone number, address, email, gas bill		
MCE01	Multifamily Energy Savings	☑	☑	☐	☐	☐	☑		No	
MCE01c	Multifamily Strategic Energy Management	☑	☐	☐	☐	☐	☐		No	
MCE01d	Residential Efficiency Market	☑	☐	☐	☐	☐	☐		No	
MCE02a	Commercial Deemed	☑	☐	☐	☐	☐	☐		No	
MCE02b	Commercial Custom	☑	☐	☐	☐	☐	☐		No	
MCE02c	Commercial Strategic Energy Management	☑	☐	☐	☐	☐	☐		No	
MCE02d	Commercial Efficiency Market	☑	☐	☐	☐	☐	☐		No	
MCE02e	Small Business Energy Advantage	☑	☐	☐	☐	☐	☐		No	
MCE08	Single Family Home Energy Savings	☑	☑	☐	☐	☐	☑		No	
MCE10a	Industrial Deemed	☑	☐	☐	☐	☐	☐		No	
MCE10b	Industrial Custom	☑	☐	☐	☐	☐	☐		No	
MCE10c	Industrial Strategic Energy Management	☑	☐	☐	☐	☐	☐		No	
MCE11a	Agricultural Deemed	☑	☐	☐	☐	☐	☐		No	
MCE11b	Agricultural Custom	☑	☐	☐	☐	☐	☐		No	

PA	Program Name	Region	Language	Ethnicity/Race	Disability	Tribal	Income	Additional Notes on Demographic Data Collected	Data Anonymized	Comments
MCE11c	Agricultural Strategic Energy Management	☑	☐	☐	☐	☐	☐		No	
MCE16	Green Workforce Pathways	☑	☐	☐	☐	☐	☑		No	
I-REN	CS-001	☑	☑	☐	☐	☐	☑	Also collect homeowner/renter status		
I-REN	WET-001	☑	☐	☐	☐	☐	☐			
3C-REN	TCR-Ag-001: Agriculture Technical Assistance	☑	☑	☑	☐	☑	☐	Address, City, County, Zip Code, Full Name, Phone Number, Company, Language, Utility Provider, Utiltiy Rate Class, Leased/Rented or Owned Facility, Number of Employees	No	
3C-REN	TCR-CC-001: Energy Assurance Services (EAS)	☑	☐	☐	☐	☐	☐	Address, City, County, Zip Code, Full Name, Phone Number	No	
3C-REN	TCR-Com-001: Commercial Marketplace	☑	☑	☑	☐	☑	☐	Address, City, County, Zip Code, Full Name, Phone Number, Company, Language, Utility Provider, Utiltiy Rate Class, Leased/Rented or Owned Facility, Number of Employees	No	
3C-REN	TCR-CS-001: Codes & Standards	☑	☐	☐	☐	☐	☐	Home Address, Zip Code, Full Name, Phone Number, Email, Organization, Profession	No	
3C-REN	TCR-Res-002: Multifamily	☑	☑	☐	☐	☑	☐	Address, City, County, Zip Code, Full Name, Phone Number, Language, CARE/FERA eligibilty, Utility Provider, Deed Restricted	No	
3C-REN	TCR-Res-003: Single Family NMEC	☑	☑	☐	☐	☑	☐	Address, City, County, Zip Code, Full Name, Phone Number, Email, CARE/FERA eligibilty, Utility Provider, Language, Tenant Ownership	No	
3C-REN	TCR-WET-001: Workforce Education & Training	☑	☑	☐	☐	☑	☐	Home Address, City, County, Zip Code, Full Name, Phone Number, Email, Employer, Job Title	No	
CCR REN	Residential Equity Program (CCR-RES-001)	☑	☐	☐	☐	☐	☐	The minimum necessary demographic data will be collected to verify program participation eligibility. Seeking additional information during the customer acquisition phase may introduce unintended consequences to program participation with rural, disadvantaged and underserved communities and reduce equitable access. See CCR REN's answer to question 1 for our	No	
CCR REN	Commercial Energy Improvement Program (CCR-COM-001)	☑	☐	☐	☐	☐	☐	The minimum necessary demographic data will be collected to verify program participation eligibility. Seeking additional information during the customer acquisition phase may introduce unintended consequences to program participation with rural, disadvantaged and underserved communities and reduce equitable access. See CCR REN's answer to question 1 for our	No	
CCR REN	Rural California Pathway for Climate Adaptive Careers (CCR-WET-001)	☑	☐	☐	☐	☐	☐	The minimum necessary demographic data will be collected to verify program participation eligibility. Seeking additional information during the customer acquisition phase may introduce unintended consequences to program participation with rural, disadvantaged and underserved communities and reduce equitable access. See CCR REN's answer to question 1 for our	No	
CCR REN	Codes and Standards Program (CCR-CS-001)	☑	☐	☐	☐	☐	☐	The minimum necessary demographic data will be collected to verify program participation eligibility. Seeking additional information during the customer acquisition phase may introduce unintended consequences to program participation with rural, disadvantaged and underserved communities and reduce equitable access. See CCR REN's answer to question 1 for our	No	
CCR REN	Public Equity Program (CCR-PUB-001)	☑	☐	☐	☐	☐	☐	Collecting demographic data on public agencies should be done at the community level opposed to the staff member level. See our answer to the additional questions.	No	
CCR REN	Finance Program (CCR-FIN-001)	☑	☐	☐	☐	☐	☐	The minimum necessary demographic data will be collected to verify program participation eligibility. Seeking additional information during the customer acquisition phase may introduce unintended consequences to program participation with rural, disadvantaged and underserved communities and reduce equitable access. See CCR REN's answer to question 1 for our	No	

Question 3:	What types of demographic data could be collected for energy efficiency program participation?
PA	Response
3C-REN	3C-REN believes geospatial data should be collected to determine eligibility based on equity community criteria. While additional data—such as household or business characteristics (income, ownership), socioeconomic factors (primary language, gender), and workforce information (employment status, occupation)—could be collected, it should not be reported at the portfolio level to account for variations in data resolution and participants' willingness to respond to surveys.
Ava	
BayREN	While it may be feasible to request participants to complete a demographic survey, BayREN has concerns about introducing an additional barrier to participation and the accuracy of voluntary survey responses after implementation. We have found that census data is a useful tool for characterizing the reach of our programs. It provides extensive insights into where projects are being implemented and helps identify which communities are benefiting most from the programs.
CCRREN	CCR REN agrees that using census block group data to link community demographics to participation is the appropriate next step. Demographic data beyond what is currently required for participation in varying programs should be collected during EM&V and be defined and agreed upon in the approved EM&V workplan. Demographic data should not be consistent across primary sectors.
IREN	Homeowner/renter status, household size, household income, language
MCE	CARE / FERA Medical Baseline and Life Support flags Essential Customer flag Zip code and census tract Rate code, NEM participation Energy consumption data
NREN	NREN's Residential and Commercial Resource Acquisition programs will track geographic location, household income, primary language, housing type, business size, and leased or rented facilities. The Codes & Standards program will also track geographic location of participants.
PG&E	PG&E is collecting customer IDs for participating customers that can be linked to geographical and other customer information such as rate code, CARE/FERA/ESA participation, NEM participation, census block group, preferred billing language, dwelling types, service types, and annual usage amounts. The census block group data point can be used to further link to disadvantaged community status, overall census data, average community incomes, and average age and race demongraphics within a given community. While additional information could be collected in surveys at the participant level for selected programs, PG&E believes these must be voluntary surveys to not provide any additional barriers to customer's participating. The ability to opt-out of these surveys may impact any ability to accurately provide information that doesn't present any biases.
SCE	Any data could be requested, the ability to verify and trust the data collected is more difficult and could lead to reduced participation.
SCG	Agree with PG&E
SDG&E	SDG&E agrees with PG&E's response but would like to clarify that the additional data collection would only occur for local/regional program participants only and not necessarily for Statewide participants. Statewide participant data is managed by the SW PA administrator. The non-lead PAs only receive their designated allocation of costs and benefits.
SDREN	In addition to the data summarized in PG&E's response, below are sector/program-level examples of demographic data that could be collected from public sources or from the customer. 1. Residential: Address/sub address data: located in AB 1550 community (Y/N), located in a region with high-respiratory disease (Y/N), year built, age, race/ethnicity, income (range), rent/own, employed (Y/N), # of people in household, primary language spoken at home. 2. Commercial: Address/sub address data: located in AB 1550 community (Y/N), located in a region with high-respiratory disease (Y/N), square footage, year built, owner's race/ethnicity, income (range), rent/own business space, # of employees, if the business sponsors U.S. visas, primary language spoken by owner, primary language(s) spoken by employees (if applicable). 3. Public: For public agency facilities: Address/sub address data: located in AB 1550 community (Y/N), located in a region with high-respiratory disease (Y/N), square footage, OSFM fire severity zone, if facility is open to the public: how many community members are served, demographics and DAC status of the municipality can be considered. For schools: Title 1 status, % of students eligible for Free or Reduced-Price Meal (Student Poverty) Data. 4. WE&T: located in AB 1550 community (Y/N), level of education and longer term outcomes collected in voluntary surveys such as percentage of participants entering the energy/STEM sector after participating, and employment status.
SoCalREN	As mentioned in our response to Q1, while it may be feasible to request participants to complete a demographic survey, SoCalREN has concerns about introducing an additional barrier to participation. We have found that census data is an invaluable tool in characterizing the reach of our programs. It provides extensive insights into where projects are being implemented and helps identify which communities are benefiting most from the programs.
PCE	Agrees with PG&E: "PG&E is collecting customer IDs for participating customers that can be linked to geographical and other customer information such as rate code, CARE/FERA/ESA participation, NEM participation, census block group, preferred billing language, dwelling types, service types, and annual usage amounts. The census block group data point can be used to further link to disadvantaged community status, overall census data, average community incomes, and average age and race demongraphics within a given community. While additional information could be collected in surveys at the participant level for selected programs, PG&E believes these must be voluntary surveys to not provide any additional barriers to customer's participating. The ability to opt-out of these surveys may impact any ability to accurately provide information that doesn't present any biases." NOTE: that there is uncertainty regarding whether or not certain federal data (such as census) will be available, reliable or protected under the current federal administration, and so there is a risk is relying on its availability.

Question 4:	For which segments, sectors, and programs should this data be collected?
PA	**Response**
3C-REN	3C-REN believes demographic data is most applicable to Residential, Public, Commercial, and Workforce Education & Training (WET) programs. In general, equity-focused programs should track demographic data to ensure they are being delivered equitably. Additionally, WET programs should collect demographic data to monitor participation among disadvantaged workers and assess workforce development impacts.
Ava	
BayREN	BayREN agrees with PG&E that demographics would lend the most insight to Residential, Public, and Commercial programs. For Residential and small commercial, demographics for individual participants may be helpful but tract-level collection would be indicative of participation trends. For public, individual participant data would likely not be very useful but tract-level demographics would show the demographic makeup of locations where projects are being done.
CCRREN	CCR REN believes that demographic data can be collected across residential, public and commercial programs. However, CCR REN offers caution in approach for commercial and public as demographics of those entities must be tailored to their organizational structure to mitigate data on the individual. In addition, CCR REN believes that this information should be collected during EM&V and that the collection of this data should begin within the residential sector and be phase out to commercial and public.
IREN	Equity and market support segments, sectors that are more focused on individual participants like residential and commercial
MCE	MCE agrees with PG&E that demographic analysis is most impactful in the residential, public, and small commercial sectors, particularly for programs that directly recruit participants. We also emphasize the importance of identifying and analyzing residential and commercial subsegments.
NREN	This data will be collected for all of NREN's programs and sectors (Residential, Public, Commercial, and C&S).
PG&E	PG&E believes demographic data is most applicable to analyze in Residential, Public, and Commercial programs. Programs that directly recruit participants would be relevant to track demographics to understand if the portfolios are serving our communities equitably. While analyzing demographics for programs that randomly select treatment and control groups, such as PG&E's Continuous Energy Feedback Program (otherwise known as Home Energy Reports), would likely provide little insight at the program level, including them in portfolio level calculations will help understand the holistic impacts on different sectors of customers.
SCE	Demographic data is most helpful in those sectors that are most prevelant in most areas such as Residential, Public and Commercial. Most Industrial and Agricultural areas are most likely more similar in demographic breakdowns.
SCG	Agreed with PG&E
SDG&E	SDG&E concurs with PG&E's response.
SDREN	Residential, Commercial, Public, Codes and Standards and Workforce, Education and Training (WE&T) programs
SoCalREN	SoCalREN agrees that demographic data is most applicable for residential, public, commercial, agricultural, and WE&T programs. While student data may not be collected, using census tract data will provide valuable insights into where program impacts are occurring and help ensure that we are reaching diverse communities effectively.
PCE	Agrees with PG&E: "PG&E believes demographic data is most applicable to analyze in Residential, Public, and Commercial programs. Programs that directly recruit participants would be relevant to track demographics to understand if the portfolios are serving our communities equitably. While analyzing demographics for programs that randomly select treatment and control groups, such as PG&E's Continuous Energy Feedback Program (otherwise known as Home Energy Reports), would likely provide little insight at the program level, including them in portfolio level calculations will help understand the holistic impacts on different sectors of customers."

Question 5:	Where should this data be reported and stored?
PA	Response
3C-REN	This data should be reported with the quarterly claims. The process should create as minimal changes as possible to the current reporting process.
Ava	
BayREN	BayREN agrees that data should be collected in claims and submitted with the existing PII submission if additional data is needed. Potentially only data currently collected (specifically address) would be required to join claims PII to demographic data at the tract level.
CCRREN	CCR REN recommends no change in the current submission process. While agreeing with PG&E regarding the use of census tracts, we believe that adding additional reporting data points must be done with great caution. In this case, site/participant address can easily be mapped on-top of a census tract polygon and the benefit of collecting and reporting census tract data in claims data does not outweigh the cost to the ratepayer where the same action can be taken at scale after the fact. Demographics collected during EM&V should be stored using current existing structures to link values to claims data.
IREN	Perhaps securely on CEDARS (only accessible for PAs and representatives of PAs)
MCE	Agree with PG&E and SCG.
NREN	This data should be reported using the claims process and stored in CEDARS.
PG&E	Required data points should be collected in claims. Where possible, minimal information like census block group should be collected that can later be tied to other demographic information by evaluators. Any automations that can be added to existing claims systems to facilitate this data joining would promote efficiency and consistent approaches statewide. Metrics should be collected in existing metrics processes.
SCE	If data is easily reported in a number, value list, or ther simple response, then claims would be the logical place to collect them. Analysis should only be reported in the metrics reports.
SCG	Stored in EECP, and reported to CEDARS
SDG&E	All required data points should be collected in claims submissions and stored/reported in CEDARS. SDG&E agrees with PG&E regarding census block data to be utilized by evaluators. However, SDG&E believes new proposed Site Information data (like census tract, CARE or FERA status, ESA status, Medical Baseline Status, Tribal designations, NAICS codes of businesses, and dwelling types) could be utilized when revamping CEDARS visualizations via Power BI to include annual report like tables/metrics. This would increase ease of access to program performance/data, can be updated more frequently/refreshed after quarterly uploads, store historical data to compare trends and alleviate the need for most excel tables requested for the Annual Report and Metrics deliverables.
SDREN	SDREN is aligned with PG&E's response.
SoCalREN	As mentioned in our response to Q1, SoCalREN recommends that ED utilize the address data already submitted with claims PII to assess demographic participation in programs. The raw data can be processed in the same manner as it currently is, but the results would need to be shared to show results (either on a program, PA, or statwide basis).
PCE	Agrees with PG&E: "Required data points should be collected in claims. Where possible, minimal information like census block group should be collected that can later be tied to other demographic information by evaluators. Any automations that can be added to existing claims systems to facilitate this data joining would promote efficiency and consistent approaches statewide. Metrics should be collected in existing metrics processes.

Question 6:	What should be the timeline for PAs to begin reporting participation by demographic group?
PA	Response
3C-REN	PAs should have at least 6 months after the final ruling to implement tracking of demographic data before reporting.
Ava	
BayREN	If the CPUC adopts the recommendation to use existing PII for demographic assessment, an added benefit would be the ability to apply a consistent methodology across PAs and over time to claims from previous years, with no additional effort required from PAs.
CCRREN	If CCR REN recommendations are adopted where Site Address is used to map against census tract data in aggregate and additional demographics are collected during EM&V no additional demographic information is required and thus no timelines are applicable. Should the CPUC disagree with CCR REN recommendations, we agree with PG&E's recommended timeline.
IREN	In line with the development of equity and market support indicators and after data sharing protocols among PAs are more robust
MCE	Agree with PG&E
NREN	PAs should be given sufficient time to begin tracking the data and getting systems in place after clear guidance on the implementation is released. This should be at least 3 to 6 months. Reporting should then be required at minimum one quarter after tracking begins. Clear dates and timelines should be give to the PAs.
PG&E	PAs should report participation by demographic group only after the CPUC has issued clear and direct guidance one the data required and each PA has had 6 months to implement any newly required collection processes.
SCE	The timeline for PAs to begin reporting should coincide with the next available Application period and the requirements and guidance should be included in the Decision for that Application period to ensure consistency throughout the applicaton period.
SCG	Agree with the PG&E
SDG&E	SDG&E concurs with PG&Es response "PAs should report participation by demographic group only after the CPUC has issued clear and direct guidance on the data required and each PA has had 6 months to implement any newly required collection processes. "
SDREN	SDREN is aligned with PG&E's response.
SoCalREN	If the CPUC adopts SoCalREN's recommendation to use existing PII for demographic assessment, an added benefit would be the ability to apply a consistent methodology across PAs and over time to claims from previous years, with no additional effort required from PAs.
PCE	Agree with PG&E: "PAs should report participation by demographic group only after the CPUC has issued clear and direct guidance one the data required and each PA has had 6 months to implement any newly required collection processes. "

Question 7:	What should the frequency be for reporting demographic participation data?
PA	Response
3C-REN	Reporting should follow the annual report/quarterly claims schedule.
Ava	
BayREN	Annual reporting for metrics and quarterly reporting for claims related data should be sufficient.
CCRREN	If CCR REN recommendations are adopted where Site Address is used to map against census tract data in aggregate and additional demographics are collected during EM&V no additional demographic information is required and thus no timelines are applicable. Should the CPUC disagree with CCR REN recommendations, we agree with PG&E's recommended timeline.
IREN	We would suggest quarterly.
MCE	Agree with PG&E
NREN	Annually would be best in the Annual Report using the annual claim, but quarterly with Claims at most, or alongside EM&V reporting.
PG&E	Annual reporting for metrics and quarterly reporting for claims related data should be sufficient.
SCE	All overarching reporting should be no more frequent than quarterly but for this type of data, annual information is probably the most relevant.
SCG	Agree with PG&E
SDG&E	SDG&E concurs with PG&Es response as annual reporting for metrics and quarterly reporting for claims related data should be sufficient.
SDREN	SDREN is aligned with PG&E's response.
SoCalREN	SoCalREN envisions data collection and reporting to the CPUC on a quarterly basis, with summary reports provided annually.
PCE	Agree with PG&E:"Annual reporting for metrics and quarterly reporting for claims related data should be sufficient."