

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking
Concerning Energy Efficiency Rolling
Portfolios, Policies, Programs,
Evaluation, and Related Issues

Rulemaking 13-11-005

**OPENING COMMENTS OF THE PUBLIC ADVOCATES OFFICE ON
ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENT ON
INLAND REGIONAL ENERGY NETWORK BUSINESS PLAN**

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July 21, 2021

I. INTRODUCTION

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) hereby submits these opening comments on the *Administrative Law Judge's Ruling Seeking Comment on Inland Regional Energy Network Business Plan* (Ruling) issued on July 6, 2021.

In these comments, Cal Advocates makes the following recommendations:

- Option 1 is the only reasonable strategy of the two proposed in the Ruling.
- The Inland Regional Energy Network's (I-REN's) proposed budgets are unreasonably large and do not comply with the Commission's budget rules established in Decision (D.) 19-12-021.
- If the I-REN business plan is approved before the end of 2021, its 2021 budget should be prorated by the time that is remaining upon its approval by the Commission.

II. DISCUSSION

In the discussion below, Cal Advocates responds to several of the questions posed by the Ruling.

1. This ruling proposes two options for Commission consideration of funding I-REN's business plan:

- **Option 1: Consider funding for program years 2022 and 2023, and assuming some portion of the I-REN proposal is funded for those years, then ask I-REN to file a program portfolio and business plan in February 2022 alongside other program administrators for program years 2024-2027.**
- **Option 2: Consider funding for program years 2022-2027, and assuming some portion of the I-REN proposal is funded for those years, then ask I-REN to file a program portfolio and business plan in February 2026 alongside other program administrators for post-2027 programs.**

For Option 2, I-REN would need to provide a budget estimate for 2026 and 2027 for the Commission and parties to respond to in reply comments.

All parties may comment on their preferred option and why is it the most reasonable. Alternatively, parties may propose an alternative and explain the rationale.

Of the two proposed strategies in the Ruling, Option 1 is the only reasonable option. Limiting consideration of I-REN’s funding to program years 2021 to 2023 would put I-REN on the same timeline as other program administrators (PAs) and support equal treatment of investor-owned utility (IOU) PAs and non-IOU PAs alike. Pursuant to D.21-05-031, other program administrators are filing two-year budget advice letters for program years 2022 to 2023, the same time period as I-REN’s proposal would cover (plus any time remaining in the 2021 program year, addressed in Question 9).¹ As noted by Southern California Gas Company (SoCalGas) in its response² to the February 26, 2021 motion by the Western Riverside Council of Governments (WRCOG) for approval of the I-REN business plan,³ aligning consideration of the I-REN business plan for program years 2024 to 2027 mirrors the intent of D.19-12-021, which postponed the business plan filing deadlines for Pacific Gas and Electric Company (PG&E) and Southern California Edison Company (SCE) “to align all program administrator portfolio filings.”⁴

I-REN argues its business plan is justified by asserting that its proposed programs will be complementary to program offerings from SCE and SoCalGas.⁵ However, it would be difficult for the Commission and stakeholders to evaluate the reasonableness of

¹ D.21-05-031, Assessment of Energy Efficiency Potential and Goals and Modification of Portfolio Approval and Oversight Process, R.13-11-005, May 20, 2021, p. 79 (Ordering Paragraph 37).

² Late-Filed Response of Southern California Gas Company (U 904 G) to Motion of the Western Riverside Council of Governments on Behalf of the Inland Regional Energy Network for Approval of Its Energy Efficiency Rolling Portfolio Business Plan and Budget. R.13-11-005, April 9, 2021, pp. 2-3.

³ Motion of the Western Riverside Council of Governments on Behalf of the Inland Regional Energy Network (I-REN) for Approval of Its Energy Efficiency Rolling Portfolio Business Plan and Budget, R.13-11-005, February 26, 2021.

⁴ Assigned Commissioner and Administrative Law Judges’ Amended Scoping Ruling Addressing Impacts of COVID-19, R.13-11-005, July 3, 2020, p. 5.

⁵ Motion of the Western Riverside Council of Governments on Behalf of the Inland Regional Energy Network (I-REN) for Approval of Its Energy Efficiency Rolling Portfolio Business Plan and Budget, R.13-11-005, February 26, 2021, p. 3.

I-REN's complementarity claim for the years 2024 to 2027 if it could not simultaneously examine SCE's and SoCalGas's potential offerings for that same time period. As such, the most appropriate of the two options posed in the Ruling is for the Commission to consider funding approval for I-REN through 2023 in this proceeding and require I-REN to submit its 2024-2027 funding proposal in the upcoming energy efficiency budget application proceeding.

- 2. Does the I-REN business plan make a clear and compelling argument about the gaps in programs that are currently offered in their region? If so, are the I-REN strategies and programs a reasonable approach to filling these gaps? Why or why not?**

Cal Advocates has no comment at this time.

- 3. Does the I-REN business plan make a clear and compelling case for their unique value? Are the sectors and programs proposed uniquely suited to I-REN's potential strengths and experience? Explain.**

Cal Advocates has no comment at this time.

- 4. The I-REN business plan proposes offerings in the areas of public sector, codes and standards, and workforce, education, and training. Are these programs and sectors appropriate for the proposed region? Explain your rationale.**

Cal Advocates has no comment at this time.

- 5. Explain how and why I-REN's proposed portfolio is complementary (or not) to the portfolios offered by other program administrators in the same geographic area who also offer similar programs and cover similar sectors.**

Cal Advocates has no comment at this time.

- 6. Explain how I-REN's proposal does or does not comply with D.19-12-021 and any other Commission requirements for REN proposals.**

As submitted, I-REN's proposed budget does not comply with the proportionality provision of D.19-12-021. Under assumptions of proportionality, SCE estimated annual budgets for I-REN that did not exceed \$1 million, while I-REN's proposed budget exceeds \$10 million per year from 2022 to 2025. This anticipated noncompliance is addressed more in Cal Advocates' response to Question 8, below.

7. Comment on whether I-REN’s proposal properly addresses metrics of success against which to measure the I-REN’s performance.

Cal Advocates has no comment at this time.

8. Comment on the reasonableness of I-REN’s proposed annual budgets. If you believe that I-REN’s proposed budget should be modified, provide an alternate budget and a justification for its basis.

I-REN’s proposed budgets are unreasonably large. I-REN’s business plan proposal requests \$50.7 million in funding over the 2021 to 2025 period, or a little over \$10 million annually on average. SCE’s calculations⁶ indicate that implementing the Commission’s guidance from D.19-12-021⁷ would result in \$725,000 for SCE’s share of the annual budget for I-REN.⁸

While SCE was unable to precisely calculate some inputs into the formula, such as SoCalGas’ expected share, SCE’s estimate is still an order of magnitude smaller than what I-REN requested. SCE expressed confidence that the “true” estimate of following D.19-12-021 would not exceed \$1 million per year.²

Absent additional information, the Commission’s budget guidance established in D.19-12-021 and the record in this proceeding do not support I-REN’s \$10 million per year budget request. Consistent with the record in this proceeding, if the Commission approves I-REN’s request to become an energy efficiency PA, the approved annual budget should not exceed \$1 million per year for the duration of the approved period.

⁶ Cal Advocates has reviewed SCE’s calculations, and they appear to be consistent with Commission guidance in D.19-12-021, with the exception that it is unclear whether the amount of the on-bill financing (OBF) loan pool is to be included as part of SCE’s budget for calculation purposes. If the Commission determines that the OBF loan pool should not be included, the estimated SCE share is just under \$800,000.

⁷ “[T]he RENs’ budgets should be proportional to the incumbent IOU budgets, in the same territory, for the number of customers served by non-statewide and non-regional programs, while taking into account plans to serve hard to reach customers... .” see D.19-12-021, Decision Regarding Frameworks for Energy Efficiency Regional Energy Networks and Market Transformation, December 12, 2019, p. 39.

⁸ Late-Filed Response of Southern California Edison Company (U 338-E) to Motion of the Western Riverside Council of Governments on Behalf of the Inland Regional Energy Network (I-REN), for Approval of Its Energy Efficiency Rolling Portfolio Business Plan and Budget. R.13-11-005, April 6, 2021. pp. 3-4.

² Ibid, p. 4.

9. Comment on whether and how much of I-REN’s proposed budget for 2021 should be included in their overall budget, if the Commission approves the business plan before the end of 2021.

If the I-REN business plan is approved by the Commission before the end of 2021, its 2021 budget should be prorated by the time remaining in the year. For planning purposes, the Commission could use the following method to estimate I-REN's prorated 2021 budget. Divide I-REN’s proposed 2021 budget by the number of months remaining in 2021 when WRCOG filed its motion (10 months) to derive a monthly rate, then multiply that monthly rate by the months remaining in 2021 when funding is expected to be approved. For example, if the Commission estimates I-REN budget approval by early October (3 months left in 2021), it should adjust 2021 funding down to 30% of the level it would otherwise have been:

$$\begin{aligned} \text{Proposed Budget} \div 10 \text{ months left when WRCOG filed} &= \text{Monthly Rate} \\ \text{Monthly Rate} * 3 \text{ months left when approval anticipated} &= \text{Prorated Budget} \\ \text{Prorated Budget} &= 0.3(\text{Proposed Budget}) \end{aligned}$$

10. Discuss how the I-REN business plan advances the goals and objectives of the Commission’s Environmental and Social Justice Action Plan.

Cal Advocates has no comment at this time.

11. Comment on the I-REN plans to serve hard-to-reach communities, disadvantaged communities, and under-served communities. Do you recommend any changes to I-REN’s approach to serving these communities and groups and tracking those reached and served?

Cal Advocates has no comment at this time.

12. With significant changes to the business plan process just adopted by the Commission in D.21-05-031, explain how, if at all, the I-REN business plan and portfolio needs to be adapted to conform to these changes?

Cal Advocates has no comment at this time.

III. CONCLUSION

Cal Advocates respectfully requests that the Commission adopt the recommendations contained herein.

Respectfully submitted,

/s/ **CARYN MANDELBAUM**

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ATTACHMENTS

Row Labels	Sum of Budget
Geographic Specific - AKA not Statewide or Regional	\$ 2,536,027
Statewide or Regional	\$ 146,493,091
Grand Total	\$ 149,029,118
OBF Loan Pool	\$ 15,000,000
Total 2021 SCE Budget	\$ 164,029,118
REN's Share of EM&V	\$ 235,535
Total 2021 SCE Budget Less REN's EM&V	\$ 163,793,582
Riverside and San Bernardino Contribution	\$ 46,861,344
Regional Split	1.55%
I-REN Share	\$ 725,557

PrgID	Program Name	Budget	Category
SCE-13-L-002B	City of Long Beach Energy Leader Partnership	\$ 44,528	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-002F	Gateway Cities Energy Leader Partnership	\$ 227,909	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-002H	Eastern Sierra Energy Leader Partnership	\$ -	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-002I	Energy Leader Partnership Strategic Support	\$ -	Statewide or Regional
SCE-13-L-002J	Desert Cities Energy Leader Partnership	\$ -	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-002K	Kern County Energy Leader Partnership	\$ -	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-002L	Orange County Cities Energy Leader Partnership	\$ 96,305	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-002M	San Gabriel Valley Energy Leader Partnership	\$ 75,244	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-002N	San Joaquin Valley Energy Leader Partnership	\$ -	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-002O	South Bay Energy Leader Partnership	\$ 37,365	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-002P	South Santa Barbara County Energy Leader Partnership	\$ 154,045	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-002Q	Ventura County Energy Leader Partnership	\$ 180,402	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-002R	Western Riverside Energy Leader Partnership	\$ -	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-002S	High Desert Regional Energy Leader Partnership	\$ -	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-002T	West Side Community Energy Leader Partnership	\$ 54,601	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-002U	Local Government Strategic Planning Pilot Program	\$ -	Statewide or Regional
SCE-13-L-002V	North Orange County Cities	\$ 40,113	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-002W	San Bernardino Association of Governments	\$ -	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-002Y	Grandfathered Street Lights	\$ 3,308,182	Statewide or Regional
SCE-13-L-003A	California Community Colleges Energy Efficiency Partnership	\$ 282,314	Statewide or Regional
SCE-13-L-003B	California Dept. of Corrections and Rehabilitation EE Partnership	\$ 273,123	Statewide or Regional
SCE-13-L-003C	County of Los Angeles Energy Efficiency Partnership	\$ 1,615,362	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-003D	County of Riverside Energy Efficiency Partnership	\$ -	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-003E	County of San Bernardino Energy Efficiency Partnership	\$ -	Geographic Specific - AKA not Statewide or Regional
SCE-13-L-003F	State of California Energy Efficiency Partnership	\$ 64,650	Statewide or Regional
SCE-13-L-003G	UC/CSU Energy Efficiency Partnership	\$ 307,428	Statewide or Regional
SCE-13-L-003I	Public Sector Performance-Based Retrofit High Opportunity Program	\$ 1,426,542	Statewide or Regional
SCE-13-RENAAdmin	IOU REN Administrative Costs	\$ 73,953	Statewide or Regional
SCE-13-SW-001A	Energy Advisor Program	\$ 16,082,726	Statewide or Regional
SCE-13-SW-001B	Plug Load and Appliances Program	\$ 3,877,122	Statewide or Regional
SCE-13-SW-001C	Multifamily Energy Efficiency Rebate Program	\$ 49,272	Statewide or Regional
SCE-13-SW-001F	Residential New Construction Program	\$ 570,565	Statewide or Regional
SCE-13-SW-001G	Residential Direct Install Program	\$ 3,010,901	Statewide or Regional
SCE-13-SW-002A	Commercial Energy Advisor Program	\$ 662,910	Statewide or Regional
SCE-13-SW-002B	Commercial Calculated Program	\$ 4,576,768	Statewide or Regional
SCE-13-SW-002C	Commercial Deemed Incentives Program	\$ 802,733	Statewide or Regional
SCE-13-SW-002F	Nonresidential HVAC Program	\$ 1,330,428	Statewide or Regional
SCE-13-SW-002G	Savings By Design	\$ 686,180	Statewide or Regional
SCE-13-SW-002H	Midstream Point of Purchase Program	\$ 459,230	Statewide or Regional
SCE-13-SW-002I	Market Based Incentive Program - Commercial	\$ -	Statewide or Regional
SCE-13-SW-003A	Industrial Energy Advisor Program	\$ 236,558	Statewide or Regional
SCE-13-SW-003B	Industrial Calculated Energy Efficiency Program	\$ 697,098	Statewide or Regional

SCE-13-SW-003C	Industrial Deemed Energy Efficiency Program	\$ 236,727	Statewide or Regional
SCE-13-SW-003D	Strategic Energy Management Program	\$ 3,077,740	Statewide or Regional
SCE-13-SW-003E	Market Based Incentive Program	\$ -	Statewide or Regional
SCE-13-SW-004A	Agriculture Energy Advisor Program	\$ -	Statewide or Regional
SCE-13-SW-004B	Agriculture Calculated Energy Efficiency Program	\$ 579,358	Statewide or Regional
SCE-13-SW-004C	Agriculture Deemed Energy Efficiency Program	\$ 362,965	Statewide or Regional
SCE-13-SW-005C	Primary Lighting Program	\$ -	Statewide or Regional
SCE-13-SW-007A	On-Bill Financing	\$ 795,715	Statewide or Regional
SCE-13-SW-007A1	On-Bill Financing Loan Pool	\$ -	Statewide or Regional
SCE-13-SW-007C	New Finance Offerings	\$ 1,776,045	Statewide or Regional
SCE-13-SW-008A	Building Codes and Compliance Advocacy	\$ -	Statewide or Regional
SCE-13-SW-008B	Appliance Standards Advocacy	\$ -	Statewide or Regional
SCE-13-SW-008C	Compliance Improvement	\$ 2,600,930	Statewide or Regional
SCE-13-SW-008D	Reach Codes	\$ 1,071,712	Statewide or Regional
SCE-13-SW-008E	Planning and Coordination	\$ 8,423,071	Statewide or Regional
SCE-13-SW-008F	National and International Standards	\$ -	Statewide or Regional
SCE-13-SW-009A	Technology Development Support	\$ 813,283	Statewide or Regional
SCE-13-SW-009B	Technology Assessments	\$ 3,932,477	Statewide or Regional
SCE-13-SW-009C	Technology Introduction Support	\$ 3,052,224	Statewide or Regional
SCE-13-SW-010A	WE&T Integrated Energy Education and Training	\$ 3,850,187	Statewide or Regional
SCE-13-SW-010B	WE&T Career Connections	\$ 499,263	Statewide or Regional
SCE-13-TP-001	Comprehensive Manufactured Homes	\$ 2,281,556	Statewide or Regional
SCE-13-TP-003	Healthcare EE Program	\$ 81,321	Statewide or Regional
SCE-13-TP-004	Data Center Energy Efficiency	\$ 34,903	Statewide or Regional
SCE-13-TP-006	Food & Kindred Products	\$ 84,042	Statewide or Regional
SCE-13-TP-007	Primary and Fabricated Metals	\$ 48,695	Statewide or Regional
SCE-13-TP-008	Nonmetallic Minerals and Products	\$ -	Statewide or Regional
SCE-13-TP-009	Comprehensive Chemical Products	\$ -	Statewide or Regional
SCE-13-TP-010	Comprehensive Petroleum Refining	\$ -	Statewide or Regional
SCE-13-TP-011	Oil Production	\$ -	Statewide or Regional
SCE-13-TP-021	Enhanced Retrocommissioning	\$ 10,152	Geographic Specific - AKA not Statewide or Regional
SCE-13-TP-022	Water Infrastructure Systems Energy Efficiency Program	\$ 44,849	Statewide or Regional
SCE-13-TP-023	Midsized Industrial Customer Program	\$ -	Statewide or Regional
SCE-13-TP-024	AB793 Residential Pay for Performance	\$ 534,880	Statewide or Regional
SCE-13-TP-025	Facility Assessment Service Program	\$ 86,389	Statewide or Regional
SCE-13-TP-029	Local Government 3P Solicitation	\$ -	Statewide or Regional
SCE-30V0100	SCE EM&V	\$ 1,797,490	Statewide or Regional
SCE-30V0200	CPUC EM&V	\$ 5,359,793	Statewide or Regional
SCE_3P_2020RCI_004	Comprehensive Multifamily Program	\$ 6,321,840	Statewide or Regional
SCE_3P_2020RCI_005	Comprehensive Commercial Program	\$ 36,252,000	Statewide or Regional
SCE_3P_2020RCI_006	Comprehensive Industrial Program	\$ 3,402,600	Statewide or Regional
SCE_SW_CSA_Appl	Codes & Standards Advocacy - State Appliance Standards Advocacy	\$ 1,270,243	Statewide or Regional
SCE_SW_CSA_Appl_PA	Codes & Standards Advocacy - State Appliance Standards Advocacy - SCE Costs	\$ -	Statewide or Regional

SCE_SW_CSA_Bldg	Codes & Standards Advocacy - State Building Codes Advocacy	1,804,407	Statewide or Regional
SCE_SW_CSA_Bldg_PA	Codes & Standards Advocacy - State Building Codes Advocacy - SCE Costs	-	Statewide or Regional
SCE_SW_CSA_Natl	Codes & Standards Advocacy - National Codes & Standards Advocacy	1,145,474	Statewide or Regional
SCE_SW_CSA_Natl_PA	Codes & Standards Advocacy - National Codes & Standards Advocacy - SCE Costs	-	Statewide or Regional
SCE_SW_FS	Food Service POS	1,883,909	Statewide or Regional
SCE_SW_FS_PA	Food Service POS - SCE Costs	-	Statewide or Regional
SCE_SW_HVAC_Up	Upstream HVAC (Comm + Res)	3,317,691	Statewide or Regional
SCE_SW_HVAC_Up_PA	Upstream HVAC (Comm + Res) - SCE Costs	84,883	Statewide or Regional
SCE_SW_IP_Colleges	Institutional Partnerships, UC/CSU/CCC	-	Statewide or Regional
SCE_SW_IP_Colleges_PA	Institutional Partnerships, UC/CSU/CCC - SCE Costs	24,724	Statewide or Regional
SCE_SW_IP_Gov	Institutional Partnerships: DGS & DoC	133,667	Statewide or Regional
SCE_SW_IP_Gov_PA	Institutional Partnerships: DGS & DoC - SCE Costs	68,296	Statewide or Regional
SCE_SW_MCWH	Midstream Comm Water Heating	1,994,489	Statewide or Regional
SCE_SW_MCWH_PA	Midstream Comm Water Heating - SCE Costs	-	Statewide or Regional
SCE_SW_NC_NonRes	NonRes New Construction	641,600	Statewide or Regional
SCE_SW_NC_NonRes_PA	NonRes New Construction - SCE Costs	87,734	Statewide or Regional
SCE_SW_NC_Res	Res New Construction	1,697,674	Statewide or Regional
SCE_SW_NC_Res_PA	Res New Construction - SCE Costs	16,998	Statewide or Regional
SCE_SW_PLA	Plug Load and Appliance	2,325,800	Statewide or Regional
SCE_SW_PLA_PA	Plug Load and Appliance - SCE Costs	49,448	Statewide or Regional
SCE_SW_UL	CA Statewide Lighting Program	3,002,688	Statewide or Regional
SCE_SW_UL_PA	Lighting (Upstream) - SCE Costs	180,161	Statewide or Regional
SCE_SW_WET_CC	WET Career Connections	187,133	Statewide or Regional
SCE_SW_WET_CC_PA	WET Career Connections - SCE Costs	-	Statewide or Regional
SCE_SW_WET_Work	WE&T Career and Workforce Readiness	395,332	Statewide or Regional
SCE_SW_WET_Work_PA	WE&T Career and Workforce Readiness - SCE Costs	-	Statewide or Regional

Program ID	Energy Efficiency Program Name
Residential Portfolio	
SCE-13-SW-001A	Energy Advisor Program
SCE-13-SW-001C	Multifamily Energy Efficiency Rebate Program
SCE-13-SW-001B	Plug Load and Appliances Program
SCE-13-TP-001	Comprehensive Manufactured Homes
SCE-13-SW-001F	Residential New Construction Program
SCE-13-SW-001G	Residential Direct Install
SCE-13-TP-024	AB793 Residential Pay for Performance
SCE-13-TP-026	Residential 3P Solicitation
Business Portfolio	
SCE-13-SW-002F	Nonresidential HVAC Program
SCE-13-SW-003D	Strategic Energy Management
Business Portfolio - Core	
SCE-13-SW-002B	Commercial Calculated Program
SCE-13-SW-002G	Savings By Design
SCE-13-SW-002C	Commercial Deemed Incentives Program
SCE-13-SW-003B	Industrial Calculated Energy Efficiency Program
SCE-13-SW-003C	Industrial Deemed Energy Efficiency Program
SCE-13-SW-004B	Agriculture Calculated Energy Efficiency Program
SCE-13-SW-004C	Agriculture Deemed Energy Efficiency Program
SCE-13-SW-002H	Midstream Point of Purchase
SCE-13-SW-003E	Market Based Incentive
SCE-13-TP-027	Commercial 3P Solicitation
SCE-13-TP-028	Industrial 3P Solicitation
Business Portfolio - Third Party	
SCE-13-TP-003	Healthcare EE Program
SCE-13-TP-004	Data Center Energy Efficiency
SCE-13-TP-005	Lodging EE Program
SCE-13-TP-006	Food & Kindred Products
SCE-13-TP-007	Primary and Fabricated Metals
SCE-13-TP-008	Nonmetallic Minerals and Products
SCE-13-TP-009	Comprehensive Chemical Products
SCE-13-TP-010	Comprehensive Petroleum Refining
SCE-13-TP-011	Oil Production
SCE-13-TP-021	Enhanced Retrocommissioning
SCE-13-TP-023	Midsize Industrial Customer Program
SCE-13-TP-025	Facility Assessment Service Program

Key

Statewide or Regional

Geographic Specific - AKA not Statewide or Regional

Partnership Portfolio	
SCE-13-L-002B	City of Long Beach Energy Leader Partnership
SCE-13-L-002F	Gateway Cities Energy Leader Partnership
SCE-13-L-002H	Eastern Sierra Energy Leader Partnership
SCE-13-L-002J	Desert Cities Energy Leader Partnership
SCE-13-L-002K	Kern County Energy Leader Partnership
SCE-13-L-002L	Orange County Cities Energy Leader Partnership
SCE-13-L-002M	San Gabriel Valley Energy Leader Partnership
SCE-13-L-002N	San Joaquin Valley Energy Leader Partnership
SCE-13-L-002O	South Bay Energy Leader Partnership
SCE-13-L-002P	South Santa Barbara County Energy Leader Partnership
SCE-13-L-002Q	Ventura County Energy Leader Partnership
SCE-13-L-002R	Western Riverside Energy Leader Partnership
SCE-13-L-002T	West Side Energy Leader Partnership
SCE-13-L-003A	California Community Colleges Energy Efficiency Partnership
SCE-13-L-003B	California Dept. of Corrections and Rehabilitation EE Partnership
SCE-13-L-003C	County of Los Angeles Energy Efficiency Partnership
SCE-13-L-003D	County of Riverside Energy Efficiency Partnership
SCE-13-L-003E	County of San Bernardino Energy Efficiency Partnership
SCE-13-L-003F	State of California Energy Efficiency Partnership
SCE-13-L-003G	UC/CSU Energy Efficiency Partnership
SCE-13-L-003I	Public Sector Performance-Based Retrofit High Opportunity
SCE-13-L-002V	North Orange County Cities
SCE-13-L-002W	San Bernardino Association of Governments
SCE-13-L-002S	High Desert Regional Energy Leader Partnership
SCE-13-TP-022	Water Infrastructure Systems EE Program
SCE-13-L-002Y	Grandfathered Street Lights
SCE-13-TP-029	Local Government 3P Solicitation
New Third Party	
SCE_3P_2020RCI_001	Enervee Marketplace
SCE_3P_2020RCI_002	Residential Behavioral Program
SCE_3P_2020RCI_003	Commercial Behavioral Program
SCE_3P_2020RCI_004	Comprehensive Multifamily Program
SCE_3P_2020RCI_005	Comprehensive Commercial Program
SCE_3P_2020RCI_006	Comprehensive Industrial Program
Code and Standards	
SCE-13-SW-008A	Building Codes and Compliance Advocacy
SCE-13-SW-008B	Appliance Standards Advocacy
SCE-13-SW-008C	Compliance Improvement
SCE-13-SW-008D	Reach Codes
SCE-13-SW-008E	Planning and Coordination

SCE-13-SW-008F	National and International Standards
SCE Led Resource Programs	
SCE_SW_WP	Water/wastewater pumping
SCE_SW_WP_PA	Water/wastewater pumping - SCE Costs
SCE_SW_UL	Lighting (Upstream)
SCE_SW_UL_PA	Lighting (Upstream) - SCE Costs
SCE_SW_IP_Colleges	UC/CSU/CCC
SCE_SW_IP_Colleges_PA	UC/CSU/CCC - SCE Costs
PG&E Led Resource Programs	
SCE_SW_CSA_Appl	Codes & Standards Advocacy - State Appliance Standards Advocacy
SCE_SW_CSA_Appl_PA	Codes & Standards Advocacy - State Appliance Standards Advocacy - SCE Costs
SCE_SW_CSA_Bldg	Codes & Standards Advocacy - State Building Codes Advocacy
SCE_SW_CSA_Bldg_PA	Codes & Standards Advocacy - State Building Codes Advocacy - SCE Costs
SCE_SW_CSA_Natl	Codes & Standards Advocacy - National Codes & Standards Advocacy
SCE_SW_CSA_Natl_PA	Codes & Standards Advocacy - National Codes & Standards Advocacy - SCE Costs
SCE_SW_NC_Res	Statewide Residential New Construction
SCE_SW_NC_Res_PA	Res New Construction - SCE Costs
SCE_SW_NC_NonRes	Statewide Non-Res New Construction
SCE_SW_NC_NonRes_PA	NonRes New Construction - SCE Costs
SCE_SW_IP_Gov	Department of General Services
SCE_SW_IP_Gov_PA	Department of General Services - SCE Costs
SCG Led Resource Programs	
SCE_SW_FS	Food Service POS
SCE_SW_FS_PA	Food Service POS - SCE Costs
SCE_SW_MCWH	Midstream Comm Water Heating
SCE_SW_MCWH_PA	Midstream Comm Water Heating - SCE Costs
SDG&E Led Resource Programs	
SCE_SW_HVAC_QIQM	Res HVAC QI/QM
SCE_SW_HVAC_QIQM_PA	Res HVAC QI/QM - SCE Costs
SCE_SW_PLA	Plug Load and Appliance
SCE_SW_PLA_PA	Plug Load and Appliance - SCE Costs
SCE_SW_HVAC_Up	Upstream HVAC (Comm + Res)
SCE_SW_HVAC_Up_PA	Upstream HVAC (Comm + Res) - SCE Costs
Residential Portfolio (Non-Resource)	
SCE-13-SW-010A	WE&T Integrated Energy Education and Training
SCE-13-SW-010B	WE&T Connections

Business Portfolio (Non-Resource)	
SCE-13-SW-002A	Commercial Energy Advisor Program
SCE-13-SW-003A	Industrial Energy Advisor Program
SCE-13-SW-004A	Agriculture Energy Advisor Program
SCE-13-SW-007A	On-Bill Financing
SCE-13-SW-007A1	On-Bill Financing Loan Pool
SCE-13-SW-007C	New Finance Offerings
Other (Non-Resource)	
SCE-13-SW-009A	Technology Development Support
SCE-13-SW-009B	Technology Assessments
SCE-13-SW-009C	Technology Introduction Support
SCE-30V0100	SCE EM&V
SCE-30V0200	CPUC EM&V
PG&E Led (Non-Resource) Programs	
SCE_SW_WET_Work	WE&T Career and Workforce Readiness
SCE_SW_WET_Work_PA	WE&T Career and Workforce Readiness - SCE Costs
SCE_SW_WET_CC	WET Career Connections
SCE_SW_WET_CC_PA	WET Career Connections - SCE Costs
SCE Led (Non-Resource) Programs	
SCE_SW_ETP_Elec	ETP, electric
SCE_SW_ETP_Elec_PA	ETP, electric - SCE Costs
Other	
SCE-13-ESPI	Energy Savings Performance Incentive
SCE-13-PB	Pension and Benefits [3]
SCE-13-PB-TRCX	Pension and Benefits - Excluded from TRC
SCE-13-RENAAdmin	REN Administrative Costs (excluded from TRC)
SCE-13-SWMEO	Statewide Marketing, Education & Outreach