



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

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Application of Pacific Gas and Electric Company
for Approval of 2024-2031 Energy Efficiency
Business Plan and 2024-2027 Portfolio Plan.

Application 22-02-005
(Filed February 15, 2022)

And Other Matters.

Application 22-03-003
Application 22-03-004
Application 22-03-005
Application 22-03-007
Application 22-03-008
Application 22-03-011
Application 22-03-012
(Consolidated)

**RESPONSE OF
ASSOCIATION OF BAY AREA GOVERNMENTS AND COUNTY OF VENTURA
TO THE ENERGY EFFICIENCY APPLICATIONS**

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April 15, 2022

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**RESPONSE OF
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TO THE ENERGY EFFICIENCY APPLICATIONS**

Pursuant to Rule 2.6 of the California Public Utilities Commission (Commission) Rules of Practice and Procedure, the Association of Bay Area Governments on behalf of the Bay Area Regional Energy Network (BayREN) and the County of Ventura on behalf of the Tri-County Regional Energy Network (3C-REN) respectfully submit the following response to the Applications (Applications) of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas, and together, the investor owned utilities (IOUs)), Southern California Regional Energy Network (SoCalREN), and Marin Clean Energy (MCE), and to the motion of Redwood Coast Energy Authority, on behalf of the Rural Regional Energy Network (RuralREN). Pursuant to Chief Administrative Law Judge’s Ruling Consolidating Proceedings; Preliminarily Determining Category, Need for Hearings, and Assignment; and Setting Protest and Response Deadline (ALJ Ruling), this response is timely filed.

I. CLEAR COORDINATION IS NECESSARY WITHIN AND BEYOND THE PROCEEDING

3C-REN and BayREN welcome the opportunity to build and deliver the best possible energy efficiency portfolio for California’s ratepayers. In order to achieve the best possible outcome of this proceeding, coordination between Applicants, particularly those with overlapping jurisdictions or services, is essential. In particular, BayREN and 3C-REN recommend the coordination of each Application with the other Applications in this proceeding, approved energy efficiency offerings in R.13-11-005 and through the Advice Letter process, and approved energy efficiency measures in other proceedings and related distributed energy resource funding.

A. Coordination across Applications, Offerings Approved in R.13-11-005, and Advice Letters

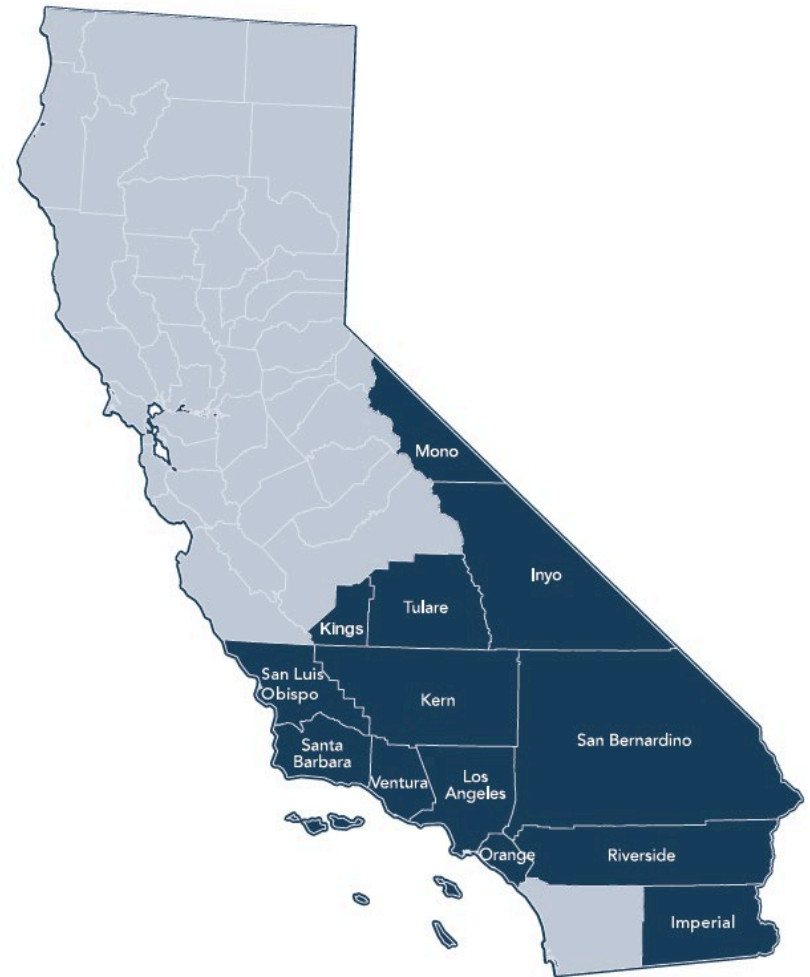
BayREN and 3C-REN recommend evaluating the complete portfolio of energy efficiency offerings, including each of the present Applications before the Commission as well as separately approved energy efficiency offerings, including the portfolio of Inland Regional Energy Network (IREN) and the “elect to administer” energy efficiency offerings of community choice aggregators (CCAs).

3C-REN further expresses concern regarding the lack of advance coordination by SoCalREN with 3C-REN, in particular, SoCalREN’s failure to communicate SoCalREN’s proposed service territory expansion which would subsume 3C-REN. 3C-REN serves the counties of Ventura, Santa Barbara, and San Luis Obispo and would be impacted as shown on the following maps. Set forth on Attachment A are SoCalREN’s responses to a 3C-REN data request regarding coordination.

EXISTING SoCALREN
SERVICE TERRITORY



PROPOSED SoCALREN
SERVICE TERRITORY



Source: SoCalREN Business Plan, 2018-2025, available at <https://socalren.com/about/regulatory-information>

Source: SoCalREN Application, 2024-2031, Exhibit SoCalREN-01 at 15.

B. Coordination with Other Proceedings Before the Commission that Have Approved Energy Efficiency or Related DER Funding

BayREN and 3C-REN further urge the Commission to de-silo energy efficiency and distributed energy resources (DER) measures. BayREN and 3C-REN recommend coordination with energy efficiency and DER programs approved in other proceedings, such as the recent Self-Generation Incentive Program (SGIP) funding of heat pump water heaters in D.22-04-036.

II. THE COMMISSION SHOULD MAKE CLEAR WHAT RESOURCES ARE AVAILABLE FOR RATEPAYERS

BayREN and 3C-REN respectfully requests that the Commission update its ratepayer-facing website on energy and energy efficiency¹ so that customers can find all of the programs and funding streams for which they may be eligible. The current Commission website has “Electrical Energy and Energy Efficiency” on a different page than “Natural Gas”; further the “Electrical Energy and Energy Efficiency” page does not direct customers to any of the energy efficiency program administrators’ websites, nor does it include a link to programs such as the TECH Initiative.²

III. RULE 2.6 REQUIREMENTS

A. Proposed Category

BayREN and 3C-REN support the proceeding’s categorization as “ratesetting.”

B. Need for Hearing

BayREN and 3C-REN do not believe that hearings will be necessary.

¹ <https://www.cpuc.ca.gov/consumer-support/consumer-programs-and-services>.

² <https://energy-solution.com/tech/>.

C. Issues to Be Considered

1. Whether each Applicant’s Strategic Business Plan and Portfolio Plan are reasonable.
2. Whether each Applicant’s Strategic Business Plan and Portfolio Plan comply with the terms of D.21-05-031.
3. Whether each Applicant’s proposed goals, estimated budget, and metrics are reasonable.
4. Whether the IOU currently serving as fiscal agent for each REN should continue to serve in that role.
5. Whether the policy recommendations of each Applicant should be adopted.

D. Proposed Schedule

Consistent with the schedule set forth in the BayREN Application and the 3C-REN Application, BayREN and 3C-REN recommend the following schedule:

Activity	Proposed Schedule
Prehearing Conference	May 11, 2022
Scoping Memo	May 25, 2022
Opening Comments	June 22, 2022
Reply Comments	July 6, 2022
Proposed Decision	August 2022
Final Decision	September 2022

IV. CONCLUSION

BayREN and 3C-REN thank Assigned Commissioner Shiroma and Assigned Administrative Law Judges Fitch and Kao for the opportunity to provide this response to the Applications.

Respectfully submitted,

/s/ Elizabeth Kelly

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Attachment A

SoCalREN Response to Data Request

**Energy Efficiency Applications
A.22-03-XXX**

**DATA REQUEST
3C-REN-SOCALREN-01
MARCH 16, 2022**

**Date for Objections: March 21, 2022
Date for Responses: March 30, 2022**

Requester: Tri-County Regional Energy Network (3C-REN)	Respondent: Southern California Regional Energy Network (SoCalREN)
Counsel: Beth Kelly Law Office of Elizabeth Kelly beth@emk-law.com 415-535-9998	Lujana Medina lmedina@isd.lacounty.gov
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1. Please describe the timing and authorizations received for SoCalREN’s proposed expansion of service territory in the Counties of San Luis Obispo, Santa Barbara, and Ventura.

There is no expansion to the SoCalREN service territory that is proposed in the 2024-2031 Business Plan. At its launch in 2013, the SoCalREN was authorized to serve joint customers of SCE and SoCalGas for both electric and gas efficiency services, individual customers of SCE for electric efficiency services even if they are not a customer of SoCalGas, and individual customers of SoCalGas for gas efficiency services even if they are not a customer of SCE. The service territory of the SoCalREN was originally defined in its Motion filed in R.13-11-005 on and D.12-11-015 adopted on November 8, 2012. In addition, the SoCalREN service territory was outlined again in its first rolling portfolio business plan Motion filed on January 23, 2017 in consolidated A.17-01-013 (et al.) and adopted in D.18-05-41 on. Last, D.19-12-021 adopted SoCalREN as an official Program Administrator of the CPUC, removed its pilot status and reaffirmed its adoption of D.18-05-041.

2. Please provide all Memoranda of Understanding and Letters of Support received by SoCalREN from the Counties of San Luis Obispo, Santa Barbara, and Ventura, or any other entity representing or situated in the Counties of San Luis Obispo, Santa Barbara, and Ventura.

Neither RENs, IOUs, nor CCAs are required by the CPUC to enter into MOUs with local government entities in order to offer energy efficiency services to ratepayers who are citizens of that entity. To date, numerous public agencies have signed SoCalREN Public Agency Program enrollment forms to receive program services for their own agency's buildings and facilities (visit <https://socalren.org/agencies/about> for a complete list). In addition, representatives from the County of Ventura, the County of Santa Barbara, and the City of Santa Barbara currently serve as members of the SoCalREN's Advisory Committee. Since 2013, we have had a collaborative and coordinated relationship that has helped to support public agencies. These supportive relationships help support the state's long term sustainable objectives as well as reveal a coordinated effort provides a deep impact in driving community engagement and local energy leadership.

3. Please describe all coordination efforts with existing program administrators (PAs) regarding SoCalREN's proposed expansion into the Counties of San Luis Obispo, Santa Barbara, and Ventura.

See response to question 1. There is no expansion to the SoCalREN service territory that is proposed in the 2024-2031 Business Plan.

SoCalREN service territory was adopted and re-affirmed in the following decisions:

**D.12-11-015
D.18-05-041
D.19-12-021**

4. Please list each program SoCalREN proposes to offer in the Counties of San Luis Obispo, Santa Barbara, and Ventura.

Just like current SoCalREN programs, SoCalREN's proposed programs in the 2024-2031 Business Plan will be available to all eligible customers located anywhere within the SoCalREN service territory.

5. Please define what constitutes a SoCalREN Regional Partner.

Please refer to page 70 of Exhibit 1: [SoCalREN 2024-2031 Strategic Business Plan \(https://socalren.org/sites/default/files/Exhibit 1 SoCalREN 2024-2031 StrategicBusinessPlan 03042022.pdf\)](https://socalren.org/sites/default/files/Exhibit%201%20SoCalREN%202024-2031%20StrategicBusinessPlan%2003042022.pdf)

6. Please list all Regional Partners as defined by SoCalREN in its Application and Testimony.

Please refer to page 70 of Exhibit 1: **SoCalREN 2024-2031 Strategic Business Plan**
(https://socalren.org/sites/default/files/Exhibit_1_SoCalREN_2024-2031_StrategicBusinessPlan_03042022.pdf)