

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



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Application of Southern California Regional
Energy Network for Approval of 2028–2035
Strategic Business Plan and 2028–2031
Energy Efficiency Portfolio Plan.

Application No. 26-03-XXX

(#940)

**APPLICATION OF SOUTHERN CALIFORNIA REGIONAL ENERGY
NETWORK (CPUC #940) FOR APPROVAL OF SOCALREN'S 2028–2035
STRATEGIC BUSINESS PLAN AND SOCALREN'S 2028–2031 ENERGY
EFFICIENCY PORTFOLIO PLAN**

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For The Southern California Regional
Energy Network

March 16, 2026

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Pursuant to Article 2 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission or CPUC), Public Utilities Code Section 850 et seq., and in accordance with Decisions (D.)21-05-031 and D.23-06-055, the Southern California Regional Energy Network (SoCalREN) respectfully submits this application for approval of its 2028–2035 Strategic Business Plan and 2028–2031 Energy Efficiency Portfolio Plan.

I. SUMMARY OF SOCALREN’S REQUEST

Energy efficiency (EE) continues to play a key role in delivering affordability, reliability, climate, and equity benefits to California ratepayers. For more than two decades, EE has been first in the loading order, codified in the Public Utilities Code¹ and grounded in the principle that the least-cost kWh is the one never consumed.

California now faces steep projected load growth driven by new energy-intensive industries and the rapid electrification of homes, businesses, and transportation. The Lawrence Berkeley National Laboratory (LBNL) reported that, when compared to electricity generation, EE programs are a least-cost strategy to meet this growing demand, as EE resources consistently remain less expensive than building additional generation supplies.² The American Council for an Energy

¹ CPUC. (2026). Integrated Resource Plan and Long-Term Procurement Plan (IRP-LTPP).

² LBNL, Consumer Benefits of Clean Energy: Energy Efficiency, pp. 4-5 (Dec. 2024).

Efficient Economy (ACEEE) concluded that failing to prioritize EE would drive more costly generation investments and further strain ratepayer affordability.³

Recent California Public Utilities Commission (Commission or CPUC) and California Energy Commission (CEC) analyses also underscore EE's high return on investment in reducing energy demand and meeting statutory requirements.⁴ EE programs not only provide enhanced comfort, safety, and reliability within homes and businesses, but also generate many billions of dollars in lifetime savings that far exceed program costs, and which remain a very small and decreasing percentage of customer bills.

In this Application and supporting testimony, SoCalREN requests that the California Public Utilities Commission (Commission or CPUC) approve a budget cap of \$838 million for 2028 through 2035, which includes two four-year portfolio cycles: 2028–2031 and 2032–2035. SoCalREN is requesting \$374.6 million in its four-year Portfolio Plan (only a 5 percent increase from the 2022 Business Plan to address ongoing inflation burden) and a forecasted budget cap for 2032–2035 of approximately \$463.4 million.

This budget advances a long-term priority to address market gaps, build EE capacity within the energy industry, and expand service to HTR and vulnerable communities in ways that help reduce existing environmental justice inequities. For 2024–2031, SoCalREN forecasts achieving a TRC ratio above 1.0 annually for its RA portfolio and a total cumulative TSB of approximately \$295 million. This funding supports continued and enhanced core sector delivery and enables new services not addressed by IOU programs. The proposed four-year budget aligns with SoCalREN's core values and CPUC objectives—to deliver claimable impactful savings, build market capacity while ensuring access to EE benefits for all ratepayers. In addition to seeking approval for its EE Business and Portfolio Plans, in this Application SoCalREN also seeks approval of certain new policy recommendations as outlined in Exhibit SoCalREN-01, Chapter 11:

1. SoCalREN recommends the Commission adopt an accountability framework that utilizes a non-energy benefits calculator to establish a standardized metric for setting annual portfolio goals and tracking REN performance.

³ ACEEE, *Faster and Cheaper – Demand-Side Solutions for Rapid Load Growth*, p. 70 (Feb. 2026).

⁴ CPUC, *Report on DSM Programs Pursuant to PUC Section 913.5: 2021-2023 Results*, p. 4 (Jul. 2025).

2. The Commission should allow EE incentives to support electrification of non-regulated fuel sources.
3. The Commission should establish streamlined and transparent Custom project approval timelines.
4. The Commission should establish a Net-to-Gross (NTG) value of 1.0 for all Custom projects.
5. The Commission should allow EE programs to support small battery storage for Rural/HTR customers impacted by PSPS events.
6. The Commission should allow minor remediations in EE programs.

II. SOCALREN'S APPLICATION IS REASONABLE AND SHOULD BE APPROVED

A. SoCalREN's Application Supports the Commission and the State of California's Goals

SoCalREN's Energy Efficiency Portfolio is directly aligned with the CPUC's and the State of California's most pressing policy priorities. By delivering targeted energy efficiency programs across Southern California's diverse public agency landscape, SoCalREN advances the State's climate and decarbonization goals by reducing energy consumption, lowering greenhouse gas emissions, and contributing to California's clean energy transition. Critically, energy efficiency is the most direct and cost-effective tool available to address the growing energy affordability crisis facing California ratepayers—by reducing the amount of energy consumed at the source, SoCalREN's portfolio lowers utility bills for participating public agencies and the communities they serve, delivering immediate and lasting financial relief without reliance on subsidies or rate adjustments. These savings, achieved through verifiable and cost-effective efficiency measures, simultaneously reduce peak demand, relieve stress on the grid, and maximize the long-term return on ratepayer investment. This is all demonstrated through its cost-effective 4-year budgeted RA program forecast.

Equally important, SoCalREN's portfolio ensures that the affordability and climate benefits of energy efficiency are equitably distributed across the communities that need them most. Southern California's disadvantaged, low-income, and hard-to-reach communities carry a disproportionately high energy burden. SoCalREN's deep regional presence, established community partnerships, and culturally competent outreach infrastructure uniquely position the organization to deliver energy

affordability relief directly to these communities through targeted efficiency investments that statewide programs have historically failed to reach. By further integrating workforce development into its program delivery model, SoCalREN creates local economic opportunity, builds a skilled and diverse clean energy workforce, and ensures that the economic benefits of California's clean energy transition are shared equitably across the Southern California region.

B. The SoCalREN Portfolio Complies with the REN Criteria

SoCalREN's proposed portfolio is consistent with the Commission's REN criteria as confirmed in D.19-12-021 and established in D.12-11-015⁵ which requires RENs to demonstrate new or unique value through activities that utilities or CCA program administrators cannot or do not intend to undertake. Unlike IOU and CCA administrators, who operate through centralized, uniform delivery models designed for broad statewide deployment, SoCalREN's programs are built upon deep regional knowledge, established local partnerships, and a tailored program delivery approach that centralized administrators are structurally unable to replicate. Each element of SoCalREN's portfolio is specifically designed to fill documented gaps in existing IOU and CCA program delivery—targeting hard-to-reach markets, underserved communities, and facility types that fall outside the scope or intent of centrally administered programs.

Furthermore, SoCalREN's portfolio includes pilot activities in areas where no current IOU or CCA program offering exists, structured from the outset with scalability as a core design principle to enable broader deployment if successful. SoCalREN's unique position within the Southern California region—anchored by trusted relationships with community-based organizations, local governments, and regional stakeholders—provides the cultural competency and localized engagement capacity necessary to meaningfully serve the diverse populations that statewide programs have consistently underserved. For these reasons, the Commission should find that SoCalREN's portfolio satisfies all applicable REN criteria and approve the portfolio as proposed.

⁵ D.12-11-015 states that RENs must undertake: 1. Activities that utilities cannot or do not intend to undertake. 2. Pilot activities where there is no current utility program offering, and where there is potential for scalability to a broader geographic reach, if successful. 3. Pilot activities in hard-to-reach markets, whether or not there is a current utility program that may overlap.

III. OVERVIEW OF SOCALREN'S APPLICATION AND TESTIMONY

Concurrent with the filing of this Application, SoCalREN is serving written direct testimony supporting its proposals. The Application consists of SoCalREN's 2032–2035 Strategic Business Plan and Energy Efficiency 2028–2031 Portfolio Plan (Exhibit 1); SoCalREN's Responses, pursuant to Energy Division Program Cards Template (Exhibit 2); SoCalREN's Energy Efficiency 2028-2035 Budget, pursuant to Energy Division Template (Exhibit 3); SoCalREN's REN Total Benefit Metric Proposal (Exhibit 4); and SoCalREN's Response to D.23-06-055 OP 2 Recommended Edits to Joint PA Working Group "Statewide Energy Efficiency Program Assessment Criteria" D.23-06-055 OP2 Statewide Assessment Framework dated February 12, 2026 (Exhibit 5).

C. Exhibit 1: SoCalREN 2028–2031 Portfolio Plan and 2028–2035 Business Plan

As directed by Energy Division Staff, SoCalREN has developed a single Narrative document detailing both the eight-year Strategic Business Plan and the four-year Portfolio Plan Application. This revised format provides Portfolio Administrators with the opportunity to better integrate eight-year and four-year goals, strategies, and outcomes, as detailed in Chapter 5 section 2. Exhibit 1 contains multiple chapters with a high level of detail. Key chapters and topics are summarized below.

i. Chapter 2: Portfolio Summary

Chapter 2 presents SoCalREN's energy efficiency vision for California for 2028-2035, describing the goals, objectives, and strategies to achieve it. SoCalREN's vision is one in which communities—especially those historically underserved—are actively shaping a safe, secure, resilient, and affordable clean energy future where energy costs are manageable for all ratepayers. Central to this vision is a cost-effective portfolio designed to meet Resource Acquisition program requirements while simultaneously advancing environmental justice, ensuring that the benefits of decarbonization are equitably distributed across California's most vulnerable communities. SoCalREN's core values drive a portfolio of programs that deliver measurable energy and climate impacts, lower energy bills for hard-to-reach households, build economic resilience, and expand access to energy efficiency benefits where they are needed most. See Figure 1 for a summary of these core values, goals, objectives, and outcomes, and Exhibit 1, Chapter 2 for detail.

ii. Chapter 3: Portfolio Strategies

Chapter 3 showcases how SoCalREN prioritizes DACs and HTR customers by integrating community-based program design, workforce development, and targeted market interventions across all sectors. SoCalREN emphasizes affordability, Total System Benefit (TSB) optimization, building decarbonization, wildfire resilience, and integrated demand-side management to address not only near-term ratepayer impacts but also long-term climate risks. SoCalREN aligns these strategies with CPUC direction including the ESJ action plan, EO N-5-24 and updated cost-effectiveness frameworks. These strategies position SoCalREN to deliver scalable, high-value energy efficiency results while growing local capacity, resilience, and access across the service territory. In addition, this chapter shows how SoCalREN strategically allocates resources across portfolio segments to maximize ratepayer value while filling market gaps not fully addressed by IOUs or CCAs.

iii. Chapter 4: Forecast Methodology and Zero-Based Budgeting

Chapter 4 describes the analytical forecasting framework used to develop SoCalREN's 2028-2035 portfolio to demonstrate the rationality of the requested budget. SoCalREN applies a rigorous zero-based budgeting approach by building each program from first principles using updated technical assumptions, avoided cost values, delivery pathways, and sector specific needs. The budgets and benefits are forecasted across the portfolio segments and sectors by using a combination of bottom-up program analysis and portfolio-level optimization to maximize TSB while maintaining cost-effectiveness.

Table 1. SoCalREN's Four-Year Budget and TSB

	2028	2029	2030	2031	Total (4-Years)
Total Budget	\$79,415,056	\$89,590,522	\$98,017,052	\$107,529,080	\$374,551,710
Total System Benefit (TSB)	\$56,224,427	\$71,997,229	\$78,478,295	\$88,952,801	\$295,652,752

iv. Chapter 6: Segmentation and Sector Strategy

Chapter 6 explains the rationale for distributing programs across Resource Acquisition, Market Support, and Equity segments. SoCalREN ensures a balanced approach that delivers near-term savings while building long-term market capacity. Segmentation enables SoCalREN to match the right tools to the customers that have the most need while still achieving cost-effective claimable savings. Through a symbiotic relationship, all three segment categories work together to accomplish SoCalREN's vision in which communities are actively shaping a safe, secure, resilient, and affordable clean energy future.

v. Chapters 7–9: Portfolio Coordination, Stakeholder Engagement, and EM&V

Chapter 7 shows how SoCalREN coordinates the portfolio internally and externally to ensure efficient delivery, minimize duplication, and provide a seamless customer experience across the service territory. SoCalREN practices structured coordination across all sectors, segments and programs to align planning, technical assistance and resource acquisition activities within the portfolio. This chapter explains SoCalREN's formal coordination practices with IOUs, Regional Energy Networks, and statewide initiatives to effectively manage overlapping territories and shared customer segments. Collectively, these coordination strategies ensure ratepayer funds are used efficiently and that customers receive clear, complementary pathways to energy efficiency, resilience, and decarbonization services.

vi. Chapter 11: Recommendations for New or Modified EE Policy

Chapter 11 presents SoCalREN's proposals for policy modifications to support the strategies and programs described in Exhibits 1 and 2. SoCalREN proposes nine policy changes to enable energy efficiency portfolios of the future. Among other things, these proposed policy changes are meant to drive deeper energy savings, support rate affordability, allow more innovation and support decarbonization. Topics include:

- 1) Proposed framework for a REN Total Benefit Metric.
- 2) Request to allow EE programs to support electrification for non-regulated fuels.
- 3) Timelines for custom projects and measure package updates.
- 4) Establish an NTG of 1.0 for all custom projects.
- 5) Incentivizing battery storage and generators for rural and HTR ratepayers facing multiple PSPS events annually.

- 6) Categorizing minor building remediations as Equity activities to remove participation barriers to EE market rate programs.
- 7) Response to OP2 regarding the statewide assessment process.

D. Exhibit 2: Program Cards

The SoCalREN program cards were developed in accordance with the CPUC Energy Division guidance for Energy Efficiency Business Plans and Implementation Plans, which establishes the required program elements, standardized descriptions, and alignment with CEDARS reporting requirements. This guidance was issued by the CPUC Energy Division in March 2025 and provided to Regional Energy Networks and other Portfolio Administrators through formal Implementation Plan Template Guidance and associated Business Plan templates.

E. Exhibit 3: SoCalREN's Proposed Budget

In Exhibit 3, SoCalREN presents its annual projected portfolio forecast budgets that sum to its eight-year budget cap request and its forecasts for savings, cost-effectiveness, and TSB through 2035. SoCalREN is requesting in its 4-year portfolio plan \$374.6 M (only a 5% increase from the previous 2022 Business Plan to address the ongoing burden of inflation) and a forecasted budget cap for 2032-2035 of approximately \$463.4 million. This budget reflects a long-term priority to meet market gaps, build EE capacity within the energy industry and serve more hard-to-reach (HTR)/vulnerable communities that will help reduce the current inequities in environmental justice. For 2024-2031, SoCalREN forecasts to achieve a Total Resource Cost (TRC) ratio above 1.0 annually for its RA portfolio and a total cumulative TSB of approximately \$295M. Please see Exhibit 3 for further details.

F. Exhibit 4: REN Accountability Metric

Exhibit 4 presents SoCalREN's proposed REN Total Benefit (RTB) metric, a supplemental accountability framework designed to capture the full economic, social, and environmental value of Regional Energy Network portfolios beyond the existing Total System Benefit metric. It outlines a research-based methodology that integrates standardized valuation factors with REN program data to estimate and aggregate benefits such as bill savings, local economic impacts, public health improvements, resilience, and greenhouse gas reductions. This exhibit also provides recommendations for Commission adoption and phased implementation of the RTB metric for future performance tracking and planning.

IV. COMPLIANCE WITH THE COMMISSION’S RULE OF PRACTICE AND PROCEDURE

A. Statutory Authority—Rule 2.1

SoCalREN files this Application pursuant to Public Utilities Code Sections 451,454, 728, 729, 740.4, and 795, the Commission’s Rule of Practice and Procedure (Rules), D.23-06-055 , D.22-09-026, D.21-09-037, D.21-05-031, D.18-05-041, D. 16-08-19, D.18-01-004, D.19-08-009, orders, and resolutions of the Commission.

B. Legal Name and Place of Business—Rule 2.1(a)

Applicant’s legal name is Southern California Regional Energy Network. SoCalREN’s principal place of business is Los Angeles, California. Its post office address is 1100 North Eastern Avenue, Los Angeles, CA 90063-3200.

C. Correspondence and Communications—Rule 2.1(b)

All correspondence and communications regarding this application should be sent electronically to Minh Le at the email listed below.

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D. Categorization—Rule 2.1(c)

SoCalREN proposes to characterize this Application as “rate setting” as defined in the Commission’s Rules of Practice and Procedure Rule 1.3(f) and Public Utilities Code §1701.1(c)(3).

E. Need for Hearing—Rule 2.1(c)

SoCalREN’s proposals submitted herein and set forth in the Exhibits constitute a sufficient record for the Commission to rule on SoCalREN’s Business Plan Application without the need for evidentiary hearings. SoCalREN believes that all interested parties can comment and express their views through written protests and comments. If the presiding officer determines that additional explanations by SoCalREN would assist the Commission to grant the requested relief, SoCalREN would tender its prepared testimony, as appropriate, and suggest that a workshop, rather than

evidentiary hearing, be convened for that purpose. Although SoCalREN does not believe that workshops are needed, SoCalREN's proposed schedule in subsection F, below, can accommodate workshops and still lead to a Commission decision by June 30, 2027.

F. Issues to be Considered—Rule 2.1(c)

The principal issues to be considered are whether:

- 1) SoCalREN's Strategic Business Plan and Portfolio Plan, as described in Exhibit 1, complies with Ordering Paragraphs 1, 4, and 7 of D.23-06-055 and Ordering Paragraph 3 of D.22-09-026.
- 2) SoCalREN's Application, testimony, and additional Exhibits comply with the Energy Division Business Plan and Portfolio Plan filing requirements adopted pursuant to Ordering Paragraph 7 of D.23-06-055.
- 3) As described in Exhibit 1, Chapter 3, SoCalREN's inclusion of its strategy for low-Global Warming Potential (GWP) refrigerants in its energy efficiency portfolio complies with Ordering Paragraph 16 of D.23-06-055.
- 4) As described in Exhibit 1, SoCalREN's eight-year Strategic Business Plan and four-year Portfolio Plan are just and reasonable and should be adopted.
- 5) SoCalREN's proposed energy efficiency policy changes, described in Exhibit 1, Chapter 11 (including Exhibits 4 and 5 as incorporated by reference), are just and reasonable and should be adopted.
- 6) As described in Exhibit 1, Chapter 4 and Exhibit 3, the zero-based budgeting approach used in creating the 2028–2031 Portfolio Plan budget complies with Ordering Paragraphs 8 and 11 of D.23-06-055.
- 7) SoCalREN's portfolio plan budget, as described in Exhibit 3 is just and reasonable and should be adopted.
- 8) SoCalREN's segmentation strategy, as described in Exhibit 1, Chapter 6, complies with Ordering Paragraphs 9 and 10 of D.23-06-055, is just and reasonable, and should be adopted.

- 9) SoCalREN's proposed allocation of budget to the market support and equity segments in its 2028–2031 Portfolio Plan, as described in Exhibit 1, Chapter 6, complies with Ordering Paragraphs 9, 10, and 23 of D.23-06-055, is just and reasonable, and should be adopted.
- 10) SoCalREN's sector strategies as described in Exhibit 1, Chapter 6 are just and reasonable and should be adopted.
- 11) SoCalREN's portfolio management strategies as described in Exhibit 1, Chapter 5 are just and reasonable and should be adopted.
- 12) SoCalREN's proposed approach to evaluation, measurement and verification as described in Exhibit 1, Chapter 9, is just and reasonable and should be adopted.

G. Proposed Schedule—Rule 2.1(c)

SoCalREN does not believe hearings are necessary and is open to participating in workshops with Commission staff, parties, and other stakeholders. SoCalREN anticipates several energy efficiency applications will be filed by other program administrators by March 16, 2026. Consistent with treatment of prior energy efficiency applications, SoCalREN presumes that the Commission will consolidate these applications given similar issues and potential for overlap. Should hearings be required, SoCalREN proposes the following schedule, if the Commission consolidates all the portfolio administrators' respective applications:

Table 2. Proposed SoCalREN Business Plan Schedule

ACTIVITY	PROPOSED SCHEDULE
Application Filed	March 16, 2026
SoCalREN Public Webinar	April 7, 2026
CAEECC Workshop	April 8, 2026
Protests or Responses to SoCalREN's Application	April 15, 2026
SoCalREN Reply to Protests	April 27, 2026
Prehearing Conference	May 18, 2026
Workshops (if needed)	July 20, 2026
Testimony of Interested Parties/Deadline to file motion for evidentiary hearings	September 21, 2026
Rebuttal Testimony/Replies to Comments	October 21, 2026

ACTIVITY	PROPOSED SCHEDULE
Evidentiary Hearings (if needed)	November 2, 2026
Opening Briefs	January 11, 2027
Reply Briefs	February 11, 2027
Proposed Decision	May 2027
Final Decisions	June 2027

On April 7, 2026, SoCalREN will be hosting a public webinar to discuss its Business Plan with stakeholders. SoCalREN will be prepared to answer stakeholder questions about this filing at this time. On April 8, 2026, SoCalREN plans to participate in a CAEECC meeting in which SoCalREN intends to present specific topics related to this filing, as requested by CAEECC. SoCalREN will also be prepared to answer any stakeholder questions at the CAEECC meeting.

SoCalREN is aware that there are other significant energy proceedings competing for Commission and intervenor resources. SoCalREN is committed to working with parties to develop a schedule for this case. SoCalREN plans to meet and confer with parties regarding the proposed schedule with the goal of jointly proposing a mutually acceptable schedule at the prehearing conference.

V. CONCLUSION AND REQUEST FOR COMMISSION ORDERS

SoCalREN respectfully requests that the Commission issue appropriate orders:

- 1) Finding that SoCalREN's Strategic Business Plan and Portfolio Plan complies with the elements listed in D.23-06-055, OPs 1 and 4.
- 2) Finding that SoCalREN's Application and testimony comply with the Energy Division template pursuant to D.23-06-055, OP 7.
- 3) Finding that SoCalREN's eight-year (2028–2035) Strategic Business Plan is just and reasonable and should be adopted.
- 4) Finding that SoCalREN's 2028–2031 portfolio plan budget, is just and reasonable and should be adopted.
- 5) Finding that SoCalREN's proposed energy efficiency policy changes described in Exhibit 1, Chapter 11 (including Exhibits 4 and 5 as incorporated by reference) are just and reasonable and should be adopted.

- 6) Finding that SoCalREN's segmentation strategy is just and reasonable and should be adopted.
- 7) Finding that SoCalREN's proposed allocation of budget to the market support and equity segments in its 2028–2031 portfolio plan is just and reasonable and should be adopted.

Respectfully submitted,

/s/ Minh Le

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For The Southern California Regional
Energy Network

March 16, 2026

VERIFICATION

I am an officer of the applicant, Southern California Regional Energy Network, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 16th day of March 2026, at Los Angeles, California.

/s/ Minh Le

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For The Southern California Regional
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