

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



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Application of Northern California Rural Regional  
Energy Network for Approval of 2028-2031  
Portfolio Plan and 2032-2035 Business Plan.

A.26-03-xxx

**APPLICATION OF THE REDWOOD COAST ENERGY AUTHORITY ON BEHALF  
OF THE NORTHERN CALIFORNIA RURAL REGIONAL ENERGY NETWORK  
FOR APPROVAL OF 2028-2031 PORTFOLIO PLAN AND 2032-2035 BUSINESS PLAN**

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For the **REDWOOD COAST ENERGY AUTHORITY**

**March 16, 2026**

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Pursuant to Rule 2.1 of the California Public Utilities Commission (CPUC or Commission) Rules of Practice and Procedure (Commission Rules) and Decision (D.) 21-05-031, as modified by the December 15, 2025 letter from Commission Executive Director Peterson, the Redwood Coast Energy Authority (RCEA), as the Lead Portfolio Administrator on behalf of the Northern California Rural Regional Energy Network (NREN) submits this Application for Approval of NREN’s 2028-2031 Portfolio Plan and 2032-2035 Business Plan (Application).

**I. ABOUT NREN**

NREN is the regional energy network (REN) administered by RCEA and located in northern California. NREN’s service territory covers roughly 33,000 square miles of some of the most rural areas in the state. NREN currently serves customers in 17 counties: Alpine, Amador, Butte, Calaveras, El Dorado, Humboldt, Lake, Lassen, Mariposa, Mendocino, Nevada, Placer, Plumas, Sierra, Sutter, Tuolumne, and Yuba. Beginning in 2028, NREN will also provide vital programs and services to rural customers in Trinity and Yolo counties, as well. NREN’s total

service territory includes 37 tribal nations, which is more than a third of the total number of tribes in California. Despite its vast geographic size – roughly 20% of California’s total land area – the estimated 1.6 million customers in this region account for less than 5% of California’s total population. The average population density is 55 people per square mile, compared to California’s average of 253 people per square mile.<sup>1</sup>

The geographically remote communities that will be served by NREN have historically low participation in energy efficiency programs. Communities in NREN’s service territory are not only rural, but hard to reach (HTR), traditionally underserved, economically disadvantaged, and isolated, which makes it difficult to provide cost-effective energy efficiency programs. NREN’s overarching intent is to address the unique challenges of rurality, which shape every facet of customer participation, technology adoption, workforce availability, and equitable access to clean energy programs. NREN’s service area faces some of the most extreme rural conditions in California, and these conditions fundamentally shape every aspect of program design, delivery, and equity outcomes. This includes low contractor density, aging housing, heavy reliance on propane and other nonregulated fuels, frequent power outages, and historically low program penetration. These structural conditions are compounded by additional challenges unique to rural buildings and contractors within the region, including reaching areas that are not easily accessible and extended travel times between customers. NREN’s program offerings are intended to address all of these challenges and set the region up for successful implementation of energy efficiency and greenhouse gas reducing programs and strategies. The offerings are intended not only to provide immediate relief, but to also establish a network that can support those efforts and build upon them moving forward.

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<sup>1</sup> <https://data.census.gov/profile/California?g=040XX00US06>

NREN's current partners, Lake Area Planning Council (LAPC), Mendocino Council of Governments (MCOG), RCEA, who is also the lead portfolio administrator, and the Sierra Business Council (SBC), facilitate the ability of NREN to reach the greatest number of customers in need throughout the region. Beginning in 2028, County of Yolo will also be an NREN implementer, allowing NREN to further expand its energy efficiency offerings to an even broader population of rural northern California.

## **II. BACKGROUND**

NREN was formally approved by the Commission in Decision D.24-09-031. Prior to establishment of a separate Northern California Rural Regional Energy Network, the Commission had approved establishment of the Rural Regional Energy Network (RuralREN) in D.23-06-055. RuralREN was designed to deliver energy efficiency programs targeted specifically to underserved rural customers throughout central and northern California. The service territory of RuralREN was vast and diverse, even among the targeted rural communities. In D.24-09-031, the Commission approved a split to RuralREN into the Northern California Rural Regional Energy Network and the Central California Rural Regional Energy Network.

As directed by D.24-09-031, on December 23, 2024, RCEA, as the lead portfolio administrator of NREN, filed a Tier 3 Advice Letter submitting a revised Business Plan for the period 2024 through 2027.<sup>2</sup> The revised Business Plan was approved by the Commission in Resolution E-5400 on August 28, 2025. NREN submits this Business Plan Application consistent with the requirements of D.21-04-031, and the specific direction provided by the Commission's Energy Division.

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<sup>2</sup> D.24-09-031, Ordering Paragraph (OP) 9.

### III. OVERVIEW OF NREN’S APPLICATION AND TESTIMONY

#### A. Executive Summary

NREN’s mission is to offer energy efficiency programs to rural communities, delivering cost savings and strengthening community resilience for the North Coast, Lake County, and Sierra Nevada regions. NREN is committed to empowering communities with tools, knowledge, and support to make informed and cost-effective energy decisions. In this Application, NREN sets forth its plan to offer essential services throughout the region, strengthened by its “By Rural, For Rural” vision. This Application demonstrates how NREN will deepen partnerships with trusted Community Based Organizations (CBOs), tribal governments, local leaders, and municipal agencies, and expand local staffing and in-person engagement to ensure ratepayers can access necessary information and participate in programs through familiar, community-rooted channels.

Building upon the foundation that was the basis for RuralREN, NREN will continue to offer a portfolio of rural-focused energy efficiency programs and measures intended to achieve four key outcomes tied to NREN’s three key themes:

***Equity:*** Ensuring rural, HTR, tribal, and underserved communities receive equitable access to CPUC programs, technical support, and local workforce opportunities.

*Outcome 1:* HTR, low income, tribal, and underserved rural customers are provided with equitable levels of services and support from CPUC energy programs.

*Outcome 2:* Equity customers are provided tools to better manage their energy use and costs through increased awareness, technical support resources, and access to a trained, local workforce to improve their homes and businesses.

***Energy Savings:*** Providing measurable, persistent energy and GHG reductions through electrification, energy efficiency, and demand-reduction activities.

*Outcome 3:* Energy consumption, energy cost and GHG emissions are

reduced across the region, contributing to California's decarbonization and energy efficiency goals.

***Access to Funding:*** Increasing rural communities' ability to secure rebates, incentives, financing, and capital for energy upgrades.

*Outcome 4:* Increased access to rebates, incentives, and financing to provide the capital needed in rural communities to enable investments in electrification and energy and demand reduction projects with persistent energy savings, GHG emissions reductions, and benefits to the grid.

This Application updates, refines, and expands upon NREN's existing portfolio of energy efficiency programs and offerings across its service area. It is informed by the state's aggressive and laudable clean energy goals, while specifically targeted to ensure that rural Californians are beneficiaries of the state's clean energy transition. It builds upon the successes of the last few years since NREN was approved, as well as those established early on as part of Rural-REN. This Business Plan Application was the product of extensive outreach by NREN and its partner organizations, and is informed by the feedback provided by residents, businesses, and local governments throughout its service territory. It provides a detailed, comprehensive strategy for ensuring that vitally important energy efficiency education, services, and programs are made available to some of California's hardest to reach customers.

Furthermore, the Business Plan Application is guided by the goals and objectives articulated in the Commission's Environmental and Social Justice (ESJ) Action Plan.<sup>3</sup> For example, rural and disadvantaged communities face disproportionate administrative burdens that often limit their ability to participate in energy efficiency programs. NREN's offerings integrate equity and access across all portfolio segments by implementing the Equity

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<sup>3</sup> Environmental & Social Justice Action Plan, 2.0, dated April 7, 2022; <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/news-office/key-issues/esj/esj-action-plan-v2jw.pdf>.

Advisory Committee’s guidance for streamlined eligibility to mitigate this burden. The Application also details NREN’s targeted investment directly in rural and equity communities throughout each of its programs. Facilitating transition away from fossil-fuel energy sources leads to decreased greenhouse emissions overall, but also provides direct air quality and public health benefits in the region. NREN’s program offerings are targeted at ensuring the customers throughout its region, many of which have been unable to access other energy efficiency programs or reap the benefits of those offerings, have programs available to them.

## **B. Overview of Sectors Served**

NREN’s current and proposed program offerings include a suite of measures that cover the Residential, Commercial, Public, Workforce, Education, and Training (WE&T), and Finance sectors.

1. Residential Sector: NREN’s residential strategy will focus on serving rural single-family and manufactured-home customers through its Home Energy Advisors and Home Energy Upgrades programs. These programs are designed to meet customers where they are and target equity<sup>4</sup> households, whether they are renters or homeowners. By pairing simplified eligibility with deep technical assistance, NREN ensures rural and underserved households can participate in and benefit from home upgrades that improve comfort, reduce energy burden, prepare homes for electrification, and create persistent greenhouse gas (GHG) and total system benefit (TSB)-aligned savings.

2. Commercial Sector: NREN’s commercial strategy targets small businesses, tribal enterprises, and nonprofit and CBO facilities through its Non-Residential Energy

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<sup>4</sup> Definition adopted in D.23-06-055 COLs 31-32

Services program. These facilities have historically been underserved by investor-owned utility (IOU) and statewide programs. Through region-specific outreach, direct install offerings, and electrification incentives, NREN helps commercial customers overcome barriers such as limited capital and lack of access to contractors.

3. NREN's Public Sector: NREN's public sector strategy expands energy efficiency and decarbonization services to rural public agencies, including counties, cities, and tribal governments through its Public Energy Services program. Public facilities often lack the staff capacity and technical expertise needed to identify, fund, and implement energy efficiency projects. NREN will fill this gap through services that help rural public agencies modernize aging buildings, improve resilience, lower operational costs, and adopt technologies that support statewide decarbonization.

4. NREN's Workforce, Education, and Training (WE&T) Sector: NREN's WE&T strategy is designed to build a sustainable, locally rooted clean energy workforce capable of delivering electrification, weatherization, and energy efficiency upgrades across all sectors. NREN's Energy Career Education and Training program integrates activities from its former Codes and Standards program with this WE&T program to ensure that building officials, contractors, and designers are equipped to implement and enforce energy code requirements.

5. NREN's Finance Sector: NREN's cross cutting Energy Upgrade Financing program expands access to capital, which is one of the most persistent barriers to rural energy efficiency and electrification by providing access to and technical assistance for loans, incentive stacking guidance, and loan concierge services for residential, commercial, and public customers. By helping customers finance electrification, building

envelope improvement, and resilience upgrades, the Energy Upgrade Financing program ensures that rural ratepayers can complete projects that generate meaningful energy savings, GHG reductions, and improved comfort, regardless of income level or access to traditional financing.

**C. NREN Exh. 1: 2028-2031 Portfolio Plan and 2032-2035 Business Plan**

Exhibit 1 contains NREN's 2028-2031 Portfolio Plan and 2032-2035 Business Plan. It is submitted consistent with the "EE Business Plan Application Template" provided by the Energy Division. It includes 10 Chapters covering the following:

Chapter 1: Executive Summary

Chapter 2: Portfolio Summary

Chapter 3: Portfolio Strategies

Chapter 4: Forecast Methodology and Zero-Based Budgeting

Chapter 5: Portfolio Management

Chapter 6: Segmentation and Sector Strategy

Chapter 7: Portfolio Coordination

Chapter 8: Stakeholder Engagement

Chapter 9: Evaluation, Measurement & Verification

Chapter 11: Recommendations for New or Modified EE Policy

The Business Plan also sets forth the budget for the program period, broken down by expenditures in each program segment. Tables 1 below summarizes the 2032-2035 forecast.

**Table 1: 4-year Portfolio Budget Forecast Summary (2032-2035)**

| <b>4-year Portfolio Budget Forecast Summary (2032-2035) (\$000)</b> |                 |                 |                 |                 |                       |
|---|-----------------|-----------------|-----------------|-----------------|-----------------------|
|   | <b>2032</b>     | <b>2033</b>     | <b>2034</b>     | <b>2035</b>     | <b>Total (4-year)</b> |
| <b>Total Budget</b>   | <b>\$29,471</b> | <b>\$30,945</b> | <b>\$32,492</b> | <b>\$34,117</b> | <b>\$127,024</b>      |
| Resource Acquisition Segment Budget                                 | \$0             | \$0             | \$0             | \$0             | \$0                   |
| Market Support Segment Budget                                       | \$3,157         | \$3,315         | \$3,480         | \$3,480         | \$13,433              |
| Equity Segment Budget   | \$25,135        | \$26,392        | \$27,712        | \$29,097        | \$118,673             |
| Codes and Standards Budget  | \$0             | \$0             | \$0             | \$0             | \$0                   |
| EM&V  | \$1,179         | \$1,238         | \$1,300         | \$1,365         | \$5,081               |
| ED Portfolio Oversight  | \$0             | \$0             | \$0             | \$0             | \$0                   |

**D. NREN Exh. 2: Program Cards**

The Program Cards provide the sector challenges and opportunities, program description, equity concerns and solutions, cost-effectiveness metrics where applicable, program budget, program delivery, and near- and long-term outputs of programs for each program in NREN’s portfolio.

**E. NREN Exh. 3: CEDARS Filing Links and Receipts**

The California Energy Data and Reporting System (CEDARS) Filing Links and Receipts confirming NREN’s budget filing upload to CEDARS.

**IV. RECOMMENDATIONS FOR NEW OR MODIFIED POLICIES**

A fundamental premise underlying NREN’s portfolio offerings is the ability to provide the suite of energy efficiency benefits to the hard-to-reach customers throughout its service territory. As the Commission recognized when it approved Rural-REN in D.23-06-055, rural RENs are “strategically designed to serve areas that have been traditionally underserved due to

their rural nature and other structural barriers, such as socioeconomic factors and the high cost of providing services in rural areas. Many regions within the [Rural]-REN area have among the lowest participation rates in energy efficiency programs in the state. As pointed out by the RCEA motion, communities and customers in the R-REN geographic areas have received fewer economic benefits from energy efficiency programs than their counterparts in urban areas.”<sup>5</sup>

NREN Exh. 1, Chapter 11 sets forth recommended policy changes that the Commission should adopt and implement to help overcome these barriers and to facilitate meeting the stated objectives of the energy efficiency program. NREN provides a summary of the requested relief below.

#### **A. Allow Fuel Switching in Energy Efficiency Programs**

##### Policy Recommendation:

NREN respectfully recommends that the Commission modify existing Energy Efficiency (EE) policy to expressly permit fuel switching from unregulated fuels (including propane, butane, and fuel oil) to regulated electric service where such switching is cost-effective, reduces greenhouse gas (GHG) emissions, and advances equity and affordability objectives.

NREN’s service territory includes a disproportionately high percentage of customers who rely on unregulated fuels—primarily propane—for space heating, water heating, and cooking. They also utilize these gas, propane, or wood-burning appliances as backup systems due to frequent unplanned outages caused by wildfire-related Public Safety Power Shutoff (PSPS) events and storm outages. These realities place rural customers at a disadvantage under standard energy efficiency and decarbonization frameworks that assume stable grid conditions, reasonable contractor access and travel times, and accessible program marketing

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<sup>5</sup> D.23-06-005, p. 23-24 (footnote omitted).

channels. In order to mitigate the adverse impacts on the significant segment of NREN's eligible customer base that is effectively precluded from participating in electrification-focused energy efficiency programs under current policy constraints, NREN is asking the Commission to refine its policies to allow fuel switching eligibility in energy efficiency programs. The proposed policy change addresses a fundamental inequity in the program's current rules. Without this change, customers using propane or other unregulated fuels are generally ineligible for incentives when replacing those systems with electric alternatives, whereas customers switching from regulated natural gas to electricity may qualify. Despite the fact that both customers are reducing total statewide GHG emissions, advancing policies for electrification, and contributing to improved air quality in their own regions, only the customers switching from natural gas is eligible for program incentives. This distinction creates an unintended and inequitable barrier for rural households, and is particularly consequential for NREN's HTR customers.

Allowing fuel switching from propane to high-efficiency electric technologies would not only provide measurable GHG reductions, improve indoor air quality, and reduce long-term household energy burdens when paired with appropriate rate design and incentives, but also ensures equitable treatment of similarly situated customers. Authorizing fuel switching for customers using unregulated fuels would expand equitable access to energy efficiency funding, better align programs with state decarbonization goals, and eliminate a structural disparity affecting rural Californians.

Despite the fact that the Commission recognized the need to address fuel switching in 2019, it has not taken affirmative actions to make the rule change since that time. However, in the R.25-04-010 Scoping Memo, then President Reynolds specifically stated that there is an

expectation that “the Commission will evaluate whether energy efficiency funding should be available to encourage fuel switching (from unregulated fuels to regulated ones), in addition to fuel substitution (of one regulated fuel for another).” NREN urges the Commission to hasten that evaluation and find that allowing fuel switching eligibility for energy efficiency funding is in the public interest and modify the program rules accordingly as soon as possible. By making this change, the Commission can rectify the program shortcoming that creates a disparate outcome: rural propane customers, who often face higher energy burdens, are excluded from the very electrification incentives targeted to help them and designed to reduce emissions and long-term energy costs. The current rules are inconsistent with the Commission’s equity directives, the State’s climate mandates, and the objective of advancing affordability.

Given the Commission’s prior acknowledgment of the importance of fuel switching policy, and the clear record demonstrating the need to adjust the rules, NREN respectfully recommends that the Commission adopt explicit guidance allowing energy efficiency incentives for cost-effective fuel switching from unregulated fuels to regulated electric service. Such action would do all of the following:

- Eliminate inequitable treatment of rural and propane-dependent households;
- Advance GHG reduction and building decarbonization objectives;
- Support long-term energy affordability by enabling high-efficiency electric technologies;
- Provide clear implementation guidance to Program Administrators and RENs.

## **B. Address Equity Gaps in Deemed Measures**

### Policy Recommendation:

NREN respectfully recommends that the Commission modify the deemed measure framework to do all of the following:

- Permit RENs to use expired or prior versions of deemed measure packages for equity-focused programs where appropriate;
- Direct prioritization of measure development that incorporates equity, fuel substitution, and non-energy benefits (“NEBs”) alongside cost-effectiveness;
- Ensure that the DEER update process evaluates equity and decarbonization impacts before measures are expired or discontinued.

The California Electronic Technical Reference Manual (eTRM) contains approximately 180 deemed measures, developed and updated by Lead Program Administrators (Lead PAs), and approved by the Commission. Approved measure packages form the basis for reporting installations through the California Energy Data and Reporting System (CEDARS) and are used to substantiate monthly, quarterly, and annual portfolio performance reports to the Commission.

Measures periodically expire or are not renewed when they no longer meet IOUs cost-effectiveness thresholds or portfolio optimization criteria without regard for how they may impact other programs. As IOU portfolios are subject to strict cost-effectiveness requirements, measure development and renewal decisions are primarily driven by total resource cost performance and portfolio savings maximization. Because REN are not subject to the same portfolio-level cost-effectiveness requirements (as the Commission has recognized that it is “likely inherently more costly (and therefore less cost-effective) to serve the [rural REN] population”),<sup>6</sup> RENs are instead evaluated on broader statutory and Commission-directed objectives, including equity advancement, non-energy benefits, market transformation, and fuel

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<sup>6</sup> D.23-06-055, p. 24.

substitution, many RENs equity-focused programs would materially benefit from the ability to use expired or prior versions of measure packages where such measures remain technically valid and aligned with community needs.

In addition, the Commission should prioritize development of new or revised measure packages that optimize not only energy savings and cost-effectiveness, but also fuel substitution impacts, health and safety improvements, and other equity indicators. Currently, CEDARS reporting captures only deemed savings metrics tied to active measure packages. As a result, important equity achievements, particularly in disadvantaged communities (DACs), HTR, underserved, low-income households, and rural territories, are not fully reflected in claims reporting, and some participant groups remain unserved when measures they need are no longer available within the deemed framework.

While certain equity-oriented measures may not yield the highest deemed savings values or meet strict cost-effectiveness prioritization criteria, they remain aligned with Commission directives related to equity, decarbonization, and market support in underserved communities. Before measures are expired, deprioritized, or materially modified, their value should be evaluated not only on energy savings metrics, but also on their contribution to fuel substitution, electrification pathways, NEBs, and service to DACs, rural, and environmental justice communities.

NREN recommends that the Commission direct staff and Lead PAs to incorporate this equity-focused review into the next Database for Energy Efficiency Resources (DEER) update cycle (DEER2028, E-5152), including explicit consideration of equity and fuel substitution impacts when measures are updated or proposed for expiration. Addressing these equity gaps is increasingly urgent as the Commission advances efforts to track and potentially incorporate

net energy benefits and other equity indicators into portfolio performance metrics and goal-setting. Without structural adjustments, the deemed framework may unintentionally undermine the Commission’s evolving equity objectives.<sup>7</sup>

### **C. Allow Rebates Higher Than Incremental Costs Gaps**

#### Policy Recommendation:

Allow greater allowance of the limited instances where cash rebates to customers may exceed the measure installation cost for programs that target HTR participants.

NREN is finding programs designed for HTR participation require higher incentives to overcome market barriers across many implemented energy efficiency measures. Rebating only the cost to get higher efficiency equipment above code is not the reality of many HTR participants, as they typically have equipment below current code and the full cost to complete the work is higher than only incremental costs. While there is discretion for approval “when rebates are expected to be higher than the incremental measure costs,”<sup>8</sup> exceptions have only been allowed on a per measure basis to-date for fuel substitution programs.<sup>9</sup> NREN proposes approval of a more overarching exception for programs that target HTR participants as this would reduce administrative burden and allow for increased program participation and increased program results.

### **D. Revise the Equity Definition**

#### Policy Recommendation:

Update the Commission’s definition of equity customers to include individuals with Access and Functional Needs (AFN), communities impacted by climate-related natural disasters, and counties included in metropolitan statistical areas that meet the underserved definition.

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<sup>7</sup> D.23-06-055 Ordering Paragraph 19.

<sup>8</sup> D.06-06-063, Energy Efficiency Policy Manual, version 6, p. 26.

<sup>9</sup> Revised CPUC Guidance Requiring an Addendum to Measure Package Documenting Rebate Greater than Incremental Measure Cost, dated May 16, 2024.

The Commission has long articulated the need to prioritize and target programs to underserved communities, serving ratepayers that are HTR and are underserved by its energy efficiency and other equity programs. The current HTR definition, however, excludes large swaths of populations that face significant barriers to program participation, including but not limited to individuals with Access and Functional Needs (AFN), communities impacted by climate-related natural disasters, and counties included in metropolitan statistical areas that meet the underserved definition.

Consistent with the underlying purposes of defining an equity segment, and the furtherance of the objectives of the ESJ Action Plan, NREN recommends that the Commission expand the definition of the equity segment based on the principles set forth in D.23-06-055,<sup>10</sup> and include underserved customers as defined Public Utilities Code Section 1601(e). Further, to capture HTR and underserved communities located within high-population counties, NREN recommends using the underserved geography in addition to the HTR geographic definition. Expanding the definition to also include add AFN to the HTR definition would break down an existing regulatory silo and would likely result in more targeted programming to this population who fall within the primary purpose of equity segment programs.

Finally, despite best efforts to build resilient communities and statewide progress towards meeting climate goals, there are communities across the state – especially those in remote areas – that are already contending with the impacts of climate-driven disasters. Consideration should be given to adding communities that are impacted by natural disasters to the geographic definition for HTR. Increased natural disasters, such as wildfires, severe storms,

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<sup>10</sup> D.23-06-055, pp 45-48.

and coastal flooding, are some of the most visible catastrophic results of the climate crisis caused by our reliance on fossil fuels. Entire communities can be devastated for years or generations. Just as negative impacts to communities experiencing poor air quality from local emissions need to be addressed through ESJ and equity considerations, so do communities already experiencing negative impacts from global GHG emissions.

#### **E. REN Total Benefit Metric**

##### Policy Recommendation:

Initiate a process to vet SoCalREN's development of an accountability framework that utilizes a non-energy benefits calculator to establish a standardized metric for setting annual portfolio goals and tracking REN performance for adoption into energy efficiency program rules.

While the current TSB metric captures essential grid impacts, it does not account for the extensive participant, partner, and community benefits that are central to the mission of the RENs as well as alignment with CPUC Equity mandates. To ensure a comprehensive evaluation of portfolio performance, SoCalREN has developed a *proposed* specialized benefits calculator (REN Benefits Calculator Tool) to output a REN Total Benefit (RTB) metric providing a more comprehensive picture of ratepayer value. NREN recommends that the Commission direct SoCalREN to initiate a stakeholder working group for feedback. NREN requests that the Commission include other RENs in the testing and development process for this calculator.

#### **F. Funding Cliff**

##### Policy Recommendation:

The Commission should utilize a Year 4 funding level at the conclusion of the program cycle and beginning of the new program cycle to allow for adequate funding in the event of a delay in approvals for 2028-2035 applications. An average of the 2024-2027 four-year funding cycle would not be adequate as ramp up was included in NREN's funding to account for the timing of NREN program launches. The beginning years of NREN's program cycle, when

averaged across the four-year period, do not reflect a feasible amount to be used for continued funding in 2028 and beyond, and instead, NREN's Year 4 budget should be used.

Extending the timing of the Business Plan Application approval further into 2027 than previously anticipated would result in a funding decrease for NREN if the current guidance from D.21-05-031 is applied. The Commission has clearly recognized that “[f]unding cliffs created by regulatory delays are detrimental to the energy efficiency market and can potentially thwart long-term gains in energy efficiency.”<sup>11</sup> For that reason, the Commission adopted an approach to avoid those cliffs in D.21-05-031, in which PAs may “continue budgets at the four-year average from the previous approved four-year energy efficiency portfolio, until such time as the Commission approves a new portfolio and budgets.”<sup>12</sup> The Commission's recognition of the detrimental effects of funding cliffs and the idea of providing guidance to avoid funding cliffs is very important and appreciated. However, NREN has a unique situation with regard to its current four-year portfolio funding. Notably, the division of Rural-REN in 2024 modified the overall program budget approved for Rural REN in D.23-06-055. As a result, NREN's approved funding did not cover four full years, and therefore, NREN respectfully requests that the CPUC provide updated guidance for recently approved RENs in order to prevent funding drop offs.

#### **IV. COMPLIANCE WITH COMMISSION RULES**

##### **A. Statutory Authority**

NREN files this Application pursuant to Public Utilities Code Sections 451,454, 728,

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<sup>11</sup> D.21-05-031 Finding of Fact 13.

<sup>12</sup> Ibid., Conclusion of Law 23.

729, 740.4, and 795, the Commission’s Rule of Practice and Procedure (Rules), 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 Principal Place of Business – Rule 2.1(a)**

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633 Third Street  
Eureka, CA 95501  
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**C. Contact Information – Rule 2.1(b)**

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| C. Susie Berlin<br>Law Offices of Susie Berlin<br>1346 The Alameda, Suite 7-141<br>San Jose, CA 95126<br>408-209-5837<br><a href="mailto:berlin@susieberlinlaw.com">berlin@susieberlinlaw.com</a> | Patricia Terry<br>Senior Portfolio Manager<br>Redwood Coast Energy Authority<br>633 Third Street<br>Eureka, CA 95501<br>707-382-2098<br><a href="mailto:pterry@redwoodenergy.org">pterry@redwoodenergy.org</a> |
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**D. Proposed Category – Rule 2.1(c)**

NREN proposes to characterize this Application as “rate setting” as defined in the Commissions Rule 1.3(f) and Public Utilities Code §1701.1(c)(3).

**E. Need for Evidentiary Hearings – Rule 2.1(c)**

NREN has endeavored to provide detailed information and testimony to support the Application, and does not think that evidentiary hearings are needed for the Commission to make finding that the Application is in the public interest and should be granted.

**F. Issues to be Considered – Rule 2.1(c)**

NREN asks that the Commission consider all of the following:

1. Whether NREN’s 2028-2031 Portfolio Plan and 2032-2035 Business Plan is reasonable.

2. Whether NREN’s 2028-2031 Portfolio Plan and 2032-2035 Business Plan complies with the terms of D.21-05-031 and the direction provided by Energy Division.
3. Whether the proposed goals, estimated budget, and metrics are reasonable.
4. Whether NREN’s recommendations for new or modified policies should be adopted and implemented.

**G. Proposed Schedule – Rule 2.1(c)**

In order to ensure that the timely review and approval of the Application, NREN proposes the following schedule for resolution of this Application:

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

|                   |               |
|-------------------|---------------|
| Proposed Decision | February 2027 |
| Final Decision    | March 2027    |

**H. Notice and Service of Application**

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

**I. Authority to Conduct Business – Rule 2.2**

The Redwood Coast Energy Authority was formed in 2003 by the County of Humboldt and the Cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell, and Trinidad, and the special district of the Humboldt Bay Municipal Water District, by a Joint Powers Agreement dated April 22, 2003. An Amended and Restated Joint Powers Agreement of the Redwood Coast Energy Authority was entered into on December 15, 2015, to implement and administer a common Community Choice Aggregation program pursuant to California Public Utilities Code Sections 331.1 and 366.2 an electric service enterprise which shall be available to those Member cities and the Counties that elect to become program participants.

**V. RELIEF REQUESTED**

NREN has put forth a comprehensive Business Plan and supporting documentation that meets all of the regulatory requirements. NREN’s portfolio and budget proposals are reasonable and should be adopted by the Commission. The programs and offerings proposed therein do not duplicate other energy efficiency offerings and help to ensure equitable access to important services for rural and hard to reach customers throughout NREN’s vast service territory. NREN requests that the Commission approve the Application and grants the following requested relief:

1. Find that NREN's 2028-2031 Portfolio Plan and 2032-2035 Business Plan is reasonable.
2. Find that NREN's 2028-2031 Portfolio Plan and 2032-2035 Business Plan complies with the terms of D.21-05-031 and the direction provided by Energy Division.
3. Find that the proposed goals, estimated budget, and metrics are reasonable.
4. Find that NREN's recommendations for new or modified policies should be adopted and implemented.

## VI. CONCLUSION

NREN appreciates the Commission's consideration of NREN's Application in its entirety and respectfully requests that the Commission approve the Application consistent with the schedule proposed herein.

March 16, 2026

Respectfully submitted,



C. Susie Berlin

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**For the Redwood Coast Energy Authority**

## APPENDIX A

### Verification

I am the Portfolio Lead of the Northern California Rural Regional Energy Network and the Senior Portfolio Manager of the Redwood Coast Energy Authority and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

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

Executed on March 13, 2026, at Eureka, California.

Respectfully submitted,

*/s/ Patricia Terry*

Patricia Terry

Senior Portfolio Manager

Redwood Coast Energy Authority on behalf of NREN

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Lead Portfolio Administrator for

Northern California Rural Regional Energy

Network (NREN) ID #U-1401-E