



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

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Application of San Diego Community Power
for Approval of the San Diego Regional
Energy Network (CPUC ID U-4001-E) 2028-
2031 Portfolio Plan and 2028-2035 Business
Plan.

Application 26-03-____
(Filed March 16, 2026)

**APPLICATION OF SAN DIEGO COMMUNITY POWER FOR APPROVAL OF THE
SAN DIEGO REGIONAL ENERGY NETWORK (CPUC ID U-4001-E)
2028-2031 PORTFOLIO PLAN AND 2028-2035 BUSINESS PLAN**

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March 16, 2026

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In accordance with Decisions (D.) 21-05-031 and 23-06-055, San Diego Community Power (SDCP) on behalf of the San Diego Regional Energy Network (SDREN), hereby submits this *Application for Approval of the SDREN 2028-2031 Portfolio Plan and 2028-2035 Business Plan* to the California Public Utilities Commission (Commission).¹ Pursuant to the Commission's December 15, 2025, *Letter Granting Extension of Time to Comply with Decision 21-05-031 Ordering Paragraph 5 and Ordering Paragraph 2 of D.23-06-055*, this Application is timely filed.²

I. ABOUT SDREN

The Commission authorized SDREN in August 2024 with a budget of \$124 million, allocated through 2027.³ SDREN's service territory is home to 3.3 million people, the second most populous of California's 58 counties and the fifth largest county in the United States. SDREN's

¹ See Decision (D.) 21-05-031, Ordering Paragraph 5 and D.23-06-055, Ordering Paragraph 2 (directing all energy efficiency portfolio administrators (PAs) to file energy efficiency business plan and portfolio applications every four years by February 15, beginning in 2022).

² Letter from Commission Executive Director Rachel Peterson, *Re: Request for Extension of Time to Comply with Decision 21-05-031 Ordering Paragraph 5 and Ordering Paragraph 2 of D.23-06-055* (Dec. 15, 2025).

³ D.24-08-003 (Aug. 1, 2024).

service territory includes the County of San Diego, 18 incorporated cities, 18 Tribal nations, 16 significant naval and military installations, 42 school districts, and 24 water districts.

SDREN aspires to be a regional leader focused on helping communities invest in strategies that accelerate decarbonization. Through its portfolio of programs, guided by its core values, SDREN is committed to delivering programs that make inroads into communities to reduce greenhouse gas (GHG) emissions, achieve equitable outcomes, drive market transformation and provide value to ratepayers.

SDREN seeks to effectuate this mission by providing a portfolio of ten programs to San Diegans. These programs, which are listed below, will serve the Commercial, Cross-Cutting (Workforce, Education and Training and Codes & Standards), Residential, and Public sectors:

- Small-to-Medium Business Energy Coach;
- Efficient Refrigeration;
- Market Access Program;
- Energy Pathways Program;
- Workforce Training and Capacity Building Program;
- Codes & Standards Program;
- Multifamily Program;
- Single-Family Program;
- Climate Resilience Leadership; and
- Tribal Engagement Program.

This Application includes the same programs that the Commission authorized in D.24-08-003, all of which will fully launch in 2026.

II. OVERVIEW OF THE SDREN APPLICATION AND TESTIMONY

A. SDREN Business Plan Overview

In this Application, SDREN requests \$175,038,485 for the four-year portfolio period and \$374,838,862 for the full eight-year strategic plan period to continue operating the ten existing programs approved in D.24-08-003. Continuation of this portfolio will advance SDREN's coordinated regional energy efficiency portfolio, which is designed to reduce energy burdens, accelerate building decarbonization, and expand equitable access to clean energy services across San Diego County. Together, these programs are designed to fill gaps in existing offerings, complement investor-owned utility (IOU) programs, and serve underserved and hard-to-reach (HTR) customers in alignment with Commission guidance for Regional Energy Networks (RENs).

These ten programs span four customer market sectors: Residential, Commercial, Public and Cross-Cutting. The portfolio includes equity-focused direct install and technical assistance programs, workforce education and training offerings, concierge-style technical assistance and customer navigation, codes & standards support for local governments and a performance-based resource acquisition program designed to deliver verifiable energy savings, increases in total system benefit (TSB) and reductions in peak demand.

Over the course of the four-year portfolio period, nearly half of SDREN's budget is dedicated to the equity segment (44%); the remainder of SDREN's proposed budget is dedicated to: market support (32%), resource acquisition (14%), codes & standards (6%) and evaluation, measurement and verification (EM&V) (4%). This allocation reflects SDREN's continued emphasis on advancing environmental equity, supporting market transformation and workforce capacity, and delivering cost-effective, grid-beneficial energy savings consistent with California's energy efficiency, affordability, decarbonization and Environmental and Social Justice (ESJ) policy objectives.

SDREN recognizes that the San Diego Gas & Electric (SDG&E) off-cycle Business Plan filed in April 2025, if authorized, would significantly impact the energy efficiency program landscape in the San Diego region. This application is currently under Commission review, with an anticipated decision in the summer of 2026. As SDG&E's application is still pending review, SDREN's proposed portfolio does not include any assumptions regarding the potential discontinuation of SDG&E's regional portfolio. SDREN will continue to coordinate closely with SDG&E under its existing portfolio and will file an off-cycle Business Plan if deemed necessary following the Commission's decision on SDG&E's request to discontinue regional energy efficiency program administration.

B. Overview of Portfolio Plan and Programs

In order to implement its eight-year vision, SDREN has developed a four-year portfolio plan (Exhibit SDREN – 01: 2028-2031 Portfolio Plan and 2028-2035 Business Plan). The Portfolio Plan proposes the continuation of the following ten programs, with a heavy focus on the equity and market support segments.

1. SMB Energy Coach

The Small-Medium Business (SMB) Energy Coach program is an equity segment program that raises awareness and increases adoption of energy efficiency and integrated demand side management (IDSM) practices and measures. This program connects a dedicated energy coach to educate SMBs on the value of energy efficiency, support access to funding and financing, conduct facility assessments, offer technical assistance (related to energy efficiency, electrification, and IDSM) and direct install (DI) of energy efficiency measures. This program plays an important role in helping SMBs adopt measures that reduce peak period usage, supporting local reliability.

2. *Efficient Refrigeration*

The Efficient Refrigeration program is an equity segment program that provides energy efficiency and IDSM education, technical assistance and no-cost DI efficient refrigeration equipment to support energy cost savings and non-energy benefits to micro, small and medium businesses. In particular, the Efficient Refrigeration program focuses on small local grocery stores, corner stores and local small businesses that sell food products. This program leverages other programs and resources to provide education on sourcing and promoting healthy food. Further, this program delivers community outreach events to promote program services and provide education on the benefits of energy efficiency and healthy food.

3. *Market Access Program (MAP)*

The Market Access Program is a resource acquisition segment program that works with contractors to offer customized incentives to reduce energy use at peak times. It utilizes a population normalized metered energy consumption (NMEC) methodology to verify savings while paying incentives based on TSB achieved, encouraging long-life measures that deliver maximum grid benefit. Local trusted entities will lead customer engagement with targeted high-opportunity businesses, with a focus on HTR and underserved businesses. Because MAP targets reductions at the hours of highest system stress, it contributes to regional electric reliability and avoids potential front-of-meter procurement costs.

4. *Energy Pathways Program*

The Energy Pathways Program is a market support segment program that increases access to energy efficiency and IDSM education and training resources. This program develops high school age students' awareness of clean energy career pathways and helps them learn the necessary skills to enter the workforce.

5. *Workforce Training & Capacity Building*

The Workforce Training & Capacity Building program is a market support segment program that enhances the clean energy workforce, focusing on skill development for adult and incumbent workers. It targets both employees and employers to boost employee skill development and the employer capacity to work on energy efficiency and IDSM projects. These workforce investments are essential to achieving SDREN's energy efficiency and decarbonization outcomes, as well as the Commission's affordability objectives, as a trained and diverse labor pool increases installation quality.

6. *Codes & Standards*

The Codes & Standards program provides energy efficiency and IDSM policy and compliance support and enhances communication and experience between permitting authorities and permit applicants.

7. *Multifamily*

The Multifamily program is an equity segment program that offers a two-pronged approach focusing on both multifamily property owners/managers and tenants to address energy efficiency and IDSM facility upgrades that impact common area maintenance and renter-specific in-unit utility bill savings. The Multifamily program offers a systems tune-up assessment as an outreach strategy that identifies "quick win" savings. Further, this program offers rebates that can be stacked onto other applicable utility, regional, state, or federal program incentives.

8. *Single-Family*

The Single-Family program is an equity segment program that offers home energy advisors for residents that serve as a personal concierge-style service to connect them to program information and funding/financing opportunities. The program's support services are designed to

meet unique homeowner and renter needs. The Single-Family program offers energy efficiency rebates, kits and IDSM educational opportunities.

9. *Climate Resilience Leadership*

The Climate Resilience Leadership program is a market support segment program that provides customized and unbiased hands-on expert guidance and support services for energy efficiency and IDSM projects. This program offers support from project identification to completion for public facilities and assets. Services include agency-wide benchmarking and strategic energy resilience planning. Targeted energy efficiency and electrification DI measures will be offered with a focus on underserved and HTR customers. The program also offers educational resources and peer-to-peer learning opportunities.

10. *Tribal Engagement*

The Tribal Engagement program is an equity segment program that offers a pathway for Tribal communities to develop, propose and implement energy-related initiatives to address their unique needs and contribute to sustainability, resilience and economic development within Tribal communities. Program resources include tailored no-cost energy efficiency and IDSM technical assistance, including a dedicated technical advisor to support the development and implementation of initiative application ideas and to champion Tribal communities' success.

Additional details regarding SDREN's portfolio of ten programs are set forth in the table below.

SDREN Program	Market Segment	REN Activity			Existin g or New	Four Year Budget 2028-2031	Eight Year Budget 2028-2035
		Gap Filli ng	Pilot	HTR			
Resource Acquisition							
Market Access Program	Commercial			✓	Existing	\$22,822,300.45	\$50,112,714.51
Market Support							
Energy Pathways Program	Cross-Cutting; Workforce, Education, & Training	✓		✓	Existing	\$9,059,160.85	\$19,255,326.20
Workforce Training and Capacity Building	Cross-Cutting - Workforce, Education, & Training	✓	✓	✓	Existing	\$14,720,843.90	\$31,289,283.40
Climate Resilience Leadership	Public	✓		✓	Existing	\$27,392,982.95	\$58,816,143.48
Equity							
Small and Medium Business Energy Coach	Commercial	✓		✓	Existing	\$13,898,740.45	\$29,745,859.87
Efficient Refrigeration	Commercial	✓		✓	Existing	\$9,071,331.42	\$19,289,196.23
Multifamily	Residential	✓		✓	Existing	\$15,211,294.96	\$32,459,824.00
Single-Family	Residential	✓		✓	Existing	\$28,547,015.93	\$60,934,074.85
Tribal Engagement	Public	✓	✓	✓	Existing	\$2,264,670.63	\$4,813,577.38
Codes & Standards							
Codes & Standards	Cross-Cutting	✓	✓	✓	Existing	\$9,059,160.85	\$19,255,326.20
Total (excludes EM&V and portfolio support)							
10 Programs	4 Market Segments				10 Existing	\$152,047,502.39	\$325,971,326.12

C. Overview of Testimony

The testimony supporting this Application is included in Exhibit 1: SDREN 2028-2031 Portfolio Plan and 2028-2035 Business Plan. Exhibit 1 is structured as follows:

1. **Chapter 1: Executive Summary** provides a high-level overview of SDREN's 2028–2031 Portfolio Plan and 2028–2035 Business Plan, including the intent of its application, strategic vision, budget request, key outcomes, and regulatory context of the application;
2. **Chapter 2: Portfolio Summary** summarizes SDREN's values, guiding principles, goals, and governance structure as well as details about its service territory;
3. **Chapter 3: Portfolio Strategies** provides an overview of SDREN's portfolio and outlines alignment with Commission driven portfolio strategies;
4. **Chapter 4: Forecast Methodology and Zero-Based Budgeting** explains the methodologies, assumptions and zero-based budgeting approach used to develop costs and benefits forecasts;
5. **Chapter 5: Portfolio Management** outlines SDREN's key metrics and outcomes, strategies to optimize the portfolio and manage risk;
6. **Chapter 6: Segmentation and Sector Strategy** details how SDREN's programs are organized across the equity, market support, resource acquisition and Codes & Standards (C&S) segments and describes sector-specific delivery approaches;
7. **Chapter 7: Portfolio Coordination** describes SDREN's coordination with SDG&E, the California Market Transformation Administrator, Energy Savings Assistance Programs, and other relevant stakeholders and partners to avoid duplication, leverage funding and maximize regional impact;
8. **Chapter 8: Stakeholder Engagement** summarizes the stakeholder engagement process and how feedback was incorporated into SDREN's Application;

9. **Chapter 9: Evaluation, Measurement, and Verification** outlines SDREN's planned EM&V activities for the 4-year and 8-year plans and budgets; and
10. **Chapter 11: Recommendations for New or Modified Energy Efficiency Policy** provides several policy recommendations for Commission consideration.

III. THE COMMISSION SHOULD APPROVE SDREN'S PROPOSED PORTFOLIO.

The SDREN portfolio presented in this Application is guided by state, Commission and local policy objectives, as well as Commission precedent regarding RENS and energy efficiency portfolios. The result is a balanced portfolio that is tailored to serve the unique needs of the San Diego region, advances important equity objectives and delivers meaningful ratepayer value. SDREN respectfully requests that the Commission approve its proposed portfolio as consistent with statewide, Commission, and local policy objectives, as well as the Commission's energy efficiency framework.

A. The SDREN Portfolio Directly Supports Statewide, Commission and Local Policy Objectives.

In this Application, SDREN proposes programs and strategies that are designed to advance an equitable, affordable and reliable transition to a zero-carbon emissions building sector while filling gaps in existing offerings, complementing IOU programs and delivering measurable benefits to underserved and HTR communities. SDREN's portfolio is aligned with the Commission's policy direction for RENS to pilot innovative delivery approaches, serve markets that are not adequately reached by other programs and deliver value to underserved and HTR markets.

At its foundation, the Application is guided by California’s goals of doubling energy efficiency in existing buildings by 2030,⁴ reducing emissions from existing buildings by at least 40 percent below 1990 levels by 2030,⁵ achieving renewable and zero-carbon retail electricity,⁶ and becoming entirely carbon neutral by 2045.⁷ The Application is also guided by the state's focus on identifying and addressing barriers to advancing energy efficiency and decarbonization in low-income and disadvantaged communities,⁸ as well as the Commission’s ESJ Action Plan.⁹

At the local and regional level, SDREN’s portfolio is informed by and aligned with the San Diego Regional Decarbonization Framework, local Climate Action Plans adopted by the County of San Diego and incorporated cities, and regional resilience and sustainability planning efforts that emphasize building decarbonization, energy affordability, climate resilience and workforce development. These local directives reinforce the need for a coordinated regional approach that addresses both system-level goals and community-specific challenges.

In developing its portfolio, SDREN has balanced these policy objectives with a focus on affordability and ratepayer value. On October 30, 2024, Governor Newsom issued Executive Order N-04-24 (Executive Order). Specifically, the Executive Order requests that the Commission:

- “[E]xamine the benefits and costs to electric ratepayers of programs it oversees and rules and orders it has promulgated pursuant to statutory mandates that may

⁴ The Clean Energy and Pollution Reduction Act (SB 350) established new energy efficiency and renewable energy targets to support California’s goal of reducing greenhouse gas emissions 40% below 1990 levels by 2030.

⁵ Assembly Bill 3232 requires the California Energy Commission (CEC) to prepare a Building Decarbonization Assessment, in consultation with the California Public Utilities Commission (CPUC), California Air Resources Board (CARB) and the California Independent System Operator. This report assesses the potential for California to reduce greenhouse gasses from buildings by 40% below 1990 levels by 2030.

⁶ Senate Bill 100 established a landmark policy requiring renewable and zero-carbon resources to supply 100 percent of electric retail sales to end-use customers by 2045.

⁷ In September 2018, former Governor Jerry Brown issued Executive Order B-55-18 to achieve carbon neutrality statewide by no later than 2045.

⁸ See, e.g. SB 350 and SB 1477

⁹ CPUC Environmental & Social Justice Action Plan, Version 2.0 Draft (ESJ Action Plan), available at <https://www.cpuc.ca.gov/news-and-updates/newsroom/environmental-and-social-justice-action-plan>.

be unduly adding to electric rates, or whose funding might more appropriately come from a source other than ratepayers”; and

- “[Report] its recommendations for modifying or repealing any statute that would reduce costs to electric ratepayers without compromising public health and safety, electric grid reliability, or the achievement of the States 2045 clean electricity goal and the States 2045 economywide carbon neutrality goal.”

B. The SDREN Portfolio is Informed by Community Feedback to Deliver Meaningful Ratepayer Value.

Throughout the development of its portfolio, SDCP consulted with stakeholders in over 60 meetings with calls for feedback across eight public meetings. This engagement shaped program scope, equity priorities, delivery strategies, and the need for concierge-style services, as well as in-language materials and simplified navigation across energy efficiency, electrification and financing resources. SDCP also evaluated the performance, cost-effectiveness and customer impacts of existing and comparable programs administered by other program administrators.

As a result of this assessment, SDREN’s portfolio incorporates program approaches that have demonstrated value, while refining delivery strategies to improve customer experience, reduce administrative complexity and better target underserved and HTR populations. SDREN’s program scopes, delivery models and resource allocation avoid duplication, address gaps and ensure that ratepayer funds are directed toward activities that deliver meaningful energy, affordability, health and safety benefits—particularly for the most vulnerable customers.

The Commission’s evaluation of ratepayer value in this proceeding will be hindered by existing methodologies and approaches which do not reflect the full value of energy efficiency including, among others, the value of: to-code savings and the full value of energy and cost

savings,¹⁰ addressing code and installation compliance rates,¹¹ reliability¹² and health and safety benefits.¹³ SDREN's portfolio is therefore designed to deliver benefits that extend beyond traditional savings metrics, while remaining consistent with Commission requirements and advancing broader public interest outcomes such as affordability.

C. SDREN's Proposed Portfolio is Consistent with Commission Guidance for Portfolio Administrators and the Overall REN Framework.

1. This Application Complies with the Commission's Rolling Portfolio Requirements.

The Commission created the current "rolling portfolio" approach to energy efficiency in D.16-08-019 and subsequently refined it in D.21-05-041, which directed PAs to submit 4-year Portfolio Plans and 8-year Business Plans on a rolling basis. Consistent with this framework, SDREN presents a 2028-2031 Portfolio Plan and 2028-2035 Business Plan in accordance with the Commission's required filing cadence, and pursuant to the Energy Division's December 15, 2025 extension granted for all portfolio administrators.

¹⁰ See, R.22-11-013 (High DER Future), Comments and Replies of various RENs regarding the Avoided Cost Calculator (ACC) dated May 12 and May 19, 2025, and in particular the in-depth comments of BayREN and 3C-REN on the ACC. BayREN and 3C-REN Comments are available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M565/K498/565498816.PDF>.

¹¹ See, A.25-13-014 (SDG&E Withdrawal), Exhibit BAY/TCR-01, Direct Testimony of Steven Moss on behalf of BayREN and 3C-REN, dated January 15, 2026. Available at: <https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2504014/8859/595201065.pdf>. See, also, California Energy Commission (CEC), Docket 24-BSTD-05, California Energy Code Compliance Gap Analysis. Available at: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=265070&DocumentContentId=101843>.

¹² See, R.24-05-023 (Electric Distribution Reliability), Comments of BayREN and 3C-REN on Order Instituting Rulemaking, dated July 8, 2024. Available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M536/K637/536637806.PDF>.

¹³ See, D.23-06-055 (Decision Authorizing Energy Efficiency Portfolios For 2024-2027 and Business Plans for 2024-2031), directing development of a non-energy benefits study. The study is in progress as of February 16, 2026 with desired research outcomes to outline methods for PAs to ensure priority non-energy benefits, including societal health, can be measured. Available at: https://pda.energydataweb.com/api/view/4183/CA%20Market%20Rate%20Equity%20Segment%20NEBs%20Study%20Research%20Plan%20v20250701_clean.pdf.

2. SDREN's Proposed Portfolio is Consistent with the REN Framework.

In D.12-11-015, the Commission authorized the first RENs as a regional pilot concept.¹⁴ The Commission authorized continued funding for those RENs in D.14-10-046,¹⁵ and subsequently solidified the role of RENs as energy efficiency portfolio administrators, stating:

“RENs have now been in existence since late 2012. As such, they are a reality within the landscape of the Commission’s energy efficiency policy. Thus, we see no further purpose served by applying the label of pilot to them.”¹⁶

The Commission approved five REN portfolio administrators in D.23-06-055,¹⁷ and a key element that differentiates RENs as portfolio administrators compared to IOU or community choice aggregators (CCAs) is that RENs are constrained in which programs they are authorized to offer. The Commission has applied this limited role since RENs were first authorized in 2012.¹⁸ In D.19-12-021, the Commission updated and clarified the role of RENs and the criteria used to evaluate new or renewed REN business plans:

“[RENs must show] new or unique value to the Commission’s energy, climate, and/or equity goals, specifically:

- Activities that utilities or CCA program administrators cannot or do not intend to undertake.
- Pilot activities where there is no current utility or CCA program offering, and where there is potential for scalability to a broader geographic reach, if successful.

¹⁴ See, D.12-05-015 at 404.

¹⁵ D.14-10-046 at 161.

¹⁶ D.19-12-021 at 17. This Decision also required that any new REN “demonstrate unique value in achieving state goals, represent more than one local government entity, to coordinate with existing program administrators in their geographic area prior to filing their business plan, to vet their proposal with stakeholders through the California Energy Efficiency Coordinating Committee (CAEECC), and to explain their REN governance structure in their business plan filing.” *Id.* at 2.

¹⁷ D.23-06-055 at 119, Ordering Paragraph 1. BayREN, Inland REN (I-REN), Rural REN, 3C-REN, and SoCalREN.

¹⁸ D.12-11-015 at 17.

- Activities serving HTR markets, whether or not there is another utility or CCA program that may overlap.”¹⁹

This limited role, however, is an important one. The Commission has consistently acknowledged the importance of the REN role within the energy efficiency landscape. In D.19-12-021, the Commission “agree[d]... that the importance of RENs may increase as budgets and roles for LGPs are shrinking within the utility portfolios for multiple reasons... The particular areas of unique capacities local governments may bring in the delivery of energy efficiency include, but may not be limited to, public sector buildings, issues surrounding building code compliance, and treating or delivering energy efficiency services to HTR customers.”²⁰

This role is critical today as energy unaffordability hits vulnerable households, businesses and communities the hardest. The SDREN portfolio is designed to fill critical service gaps, pilot and scale innovative delivery models and prioritize HTR and underserved customers through coordinated, equity-focused programs that reduce energy burden while delivering durable and load flexible energy, affordability and system benefits.

3. *The SDREN Portfolio Is Consistent with the Portfolio Segmentation Direction for RENs.*

Decision 21-05-031 directed portfolio administrators to segment their portfolios into three distinct segments based on the primary program purpose, defined as follows:

“Resource Acquisition: Programs with a primary purpose of, and a short-term ability to, deliver cost-effective avoided cost benefits to the electricity and natural gas systems. Short-term is defined as during the approved budget period for the portfolio, which will be discussed further later in this decision. This segment should make up the bulk of savings to achieve TSB goals.

Market Support: Programs with a primary objective of supporting the long-term success of the energy efficiency market by educating customers, training

¹⁹ D.19-12-021 at 32. Where there is overlap of programs, the Commission has advised a REN to “target[] the hardest-to-reach customers for activities that overlap or are significantly similar to [the IOUs].” D.18-05-041 at 100.

²⁰ D.19-12-021 at 18.

contractors, building partnerships, or moving beneficial technologies towards greater cost-effectiveness.

Equity: Programs with a primary purpose of providing energy efficiency to HTR or underserved customers and disadvantaged communities in advancement of the Commission's Environmental and Social Justice (ESJ) Action Plan; Improving access to energy efficiency for ESJ communities, as defined in the ESJ Action Plan, may provide corollary benefits such as increased comfort and safety, improved indoor air quality, and more affordable utility bills, consistent with Goals 1, 2, and 5 in the ESJ Action Plan.”²¹

Decision 23-06-055 identified “a fourth distinct segment,” **codes & standards**, which has the primary purposes of:

- Influencing standards and code-setting bodies (such as the California Energy Commission (CEC)) to strengthen energy efficiency regulations;
- Improving compliance with existing codes & standards;
- Assisting local governments to develop ordinances that exceed statewide minimum requirements; and
- Coordinating with the other programs and entities to support the state’s policy goals.²²

The Commission has limited IOUs’ and CCAs’ ability to serve the market support and equity segments, but does not apply that same limitation to RENs. In D.21-05-031, the Commission provided that “[t]he budget amount devoted to the market support and equity programs will be limited to 30% of the total budgets, except in the case of the REN program administrators.”²³ The Commission reasoned that “[t]he RENs are exempted from this requirement because of the nature of their portfolios, which is already different from the other program administrators. RENs, by their nature and primary purposes, are more likely to have a greater share of their portfolio devoted to market support and/or equity programs.”²⁴

²¹ D.21-05-031 at 14-15.

²² D.23-06-055 at 13.

²³ D.21-05-031 at 2, emphasis added.

²⁴ *Id.* at 23.

SDREN's portfolio spans all four segments: Equity, Market Support, Resource Acquisition and Codes & Standards. Each serves a distinct but complementary role in advancing equitable decarbonization and market transformation goals. The distribution of programs and budgets across segments was developed to advance SDREN's three overarching goals: advancing decarbonization, providing comprehensive and equitable energy efficiency services and accelerating the clean energy economy through workforce opportunities. Regardless of segmentation, all programs within the SDREN portfolio have been designed with the Commission's equity objectives in mind.

Guided by its commitment to environmental equity, collaboration and community-driven change, SDREN prioritizes investments that deliver the greatest benefit to underserved and HTR communities, strengthen local market capacity and build lasting regional partnerships. This approach to segmentation ensures that SDREN's portfolio both complements IOU offerings and channels resources toward long-term, community-centered transformation.

4. The SDREN Portfolio Provides Unique Value and Is Designed to Increase Portfolio Cost-Effectiveness.

Due to RENs' unique and limited role as Commission-authorized portfolio administrators, the Commission has not imposed the same minimum cost-effectiveness threshold on RENs as it has imposed on IOU and CCA program administrators. The Commission found in D.18-05-041:

“[W]e do not find it reasonable to impose a minimum cost-effectiveness threshold for REN proposals. As we have maintained in the past, the more limited scope of activities we authorize RENs to undertake, which results in a much lower ability to diversify their portfolios (relative to the IOUs), argues against holding them to a particular cost-effectiveness standard.”²⁵

The Commission reiterated this position in D.19-12-021, stating:

“We approved the existing REN portfolios recently, in D.18-05-041, and at that time reaffirmed that we do not wish to set a specific cost-effectiveness threshold

²⁵ D.18-05-041 at 95.

for RENs. This is both because the size of the REN portfolios is smaller, and because the RENs are inherently designed to take on filling gaps in the other larger portfolios or serving the needs of hard-to-reach customer segments/markets that will be naturally less cost-effective to serve. None of this reasoning has changed, and therefore, we continue to decline to set a cost-effectiveness threshold for new or existing RENs now.”²⁶

The Commission further re-affirmed this approach in D.21-05-031 with regards to resource acquisition programs, “requir[ing] that all program administrators with energy efficiency resource acquisition programs, excluding RENs whose portfolios have different rules, to show that the resource acquisition segment of their portfolio, with all resource acquisition programs costs and benefits combined together, is cost-effective on an *ex ante* basis, with a total resource cost (TRC) ratio of at least 1.0 or greater.”²⁷ With regard to market support and equity programs, the PAs have developed metrics and indicators to evaluate program performance which were adopted in D.23-06-055²⁸ and recently refined and adopted via Resolution E-5351.

Instead of evaluating RENs on a minimum cost-effectiveness threshold, the Commission has historically evaluated each REN portfolio’s ability to provide value, meet designated targets, and track, with a goal of improving upon, cost-effectiveness.²⁹ The Commission has “encourage[d] RENs to manage their programs with an eye toward long-term cost-effectiveness, just as we encourage the other program administrators to do.”³⁰

²⁶ D.19-12-021 at 37.

²⁷ D.21-05-031 at 22. Emphasis added.

²⁸ D.23-06-055 at 59 *et seq.*

²⁹ D.18-05-041 at 95. “To be clear, we remain interested in seeing RENs provide value (or the promise of value), and this serves as a key criterion against which we evaluate their proposals and will assess their performance going forward, particularly in tracking business plan metrics and assessing PAs progress in meeting their designated targets. We decline to consider the proposed Benefits Evaluation Framework, as we prefer to use the same cost-effectiveness methodology for all PAs even if we do not hold the RENs to a particular standard. We also remain interested in seeing improving TRC estimates over the long run, therefore we retain our requirement for RENs to include cost-effectiveness statements in their ABALs.”

³⁰ D.19-12-021 at 37.

SDREN has done so here. SDREN has considered the adopted equity, market support and common metrics/indicators,³¹ alongside a suite of intentionally designed, SDREN-unique value metrics that reflect SDREN’s unique position as a trusted facilitator of regional energy solutions. SDREN’s proposed portfolio is designed to increase affordability, increase investments in underserved/HTR communities, expand local clean energy workforce opportunities and creatively layer programs and funding sources to maximize benefits delivered to program participants and San Diego communities.

Through reporting of these metrics and meeting established targets, SDREN will demonstrate the value of its portfolio and program activities. In addition to SDREN’s resource acquisition program, several of SDREN’s equity and market support programs will also capture energy savings, contributing to SDREN’s TSB goals. Beyond TSB, SDREN will track and report all other values required by the Commission (e.g., TRC, Program Administrator Cost (PAC)). SDREN will use reported values to track portfolio performance and adaptively manage programs to optimize efficacy as needed.

5. *SDREN’s Proposed Portfolio Aligns with the Commission’s Guidance Regarding Overlap Between Portfolio Administrators.*

In administering its current portfolio and developing the suite of programs proposed in this Application, SDREN has implemented the Commission’s guidance:

“[W]e expect programs offered by different PAs will not significantly overlap, except for programs intended to serve hard-to-reach customers. We maintain a preference for PAs to work collaboratively not only to minimize duplication in non-hard-to-reach customer populations but importantly to strive toward effective regional strategies and complementary program offerings; to be clear, PAs should communicate regularly in the course of administering their portfolios and preparing applications for future cycles; this regular communication is particularly important

³¹ Indicators for Equity and Market Support segments from D.23-06-055, along with the “common metrics and indicators” from D.18-05-041 were refined and adopted via Resolution E-5351.

in light of the IOUs' solicitations, which could result in the launch of new programs at any time and potentially implicate existing programs offered by other PAs.”³²

SDREN operates in a territory that only overlaps geographically with one existing PA, SDG&E. SDREN has complied with the Joint Cooperation Memorandum (JCM) requirements in D.23-06-055 and has communicated regularly with SDG&E. This is consistent with CPUC policy that “[a]s long as program administrators and implementers are addressing different aspects of the energy efficiency marketplace, and/or coordinating their efforts in the same geographic area, some overlap may be fine or even positive, especially if the individual entities coordinate their offerings and their outreach to customers.”³³

SDREN has used the JCM negotiation process to work with SDG&E to ensure not only that it is not duplicating activities, but also that SDREN and SDG&E's collective efforts are best serving shared residents, businesses and institutions. SDREN and SDG&E's regular coordination (guided by the JCM) occurs through monthly sector coordination calls. For coordination with statewide programs, SDREN will conduct meetings with statewide PA leads as necessary to ensure that lessons learned are shared and that duplicative efforts are avoided.

In addition to JCM related engagement, SDREN and SDG&E have recurring regulatory and compliance coordination meetings. SDREN and SDG&E also held a dedicated 2028-2035 Business Portfolio Application coordination meeting during the development of this Application. The regular coordination among SDREN and SDG&E mitigates the risk of improper overlap and facilitates the goal of more holistic programs and greater reach to the San Diego region.

³² D.23-06-055 at 89-90.

³³ D.19-12-021 at 25.

IV. THE COMMISSION SHOULD APPROVE SDREN'S PROPOSED BUDGET.

SDREN's proposed budget reflects a deliberate, data-driven approach to portfolio design and resource allocation that is grounded in Commission guidance, regional market conditions and stakeholder input. SDREN developed its proposed budget levels using a zero-based budgeting framework, consistent with D.21-05-031, under which each program's funding was justified based on its purpose, delivery approach, anticipated participation and contribution to SDREN's portfolio goals and outcomes. This approach ensures that proposed funding levels are necessary, proportional and aligned with the services SDREN intends to deliver.

SDREN's distribution of budget across portfolio segments reflects several defining characteristics of the San Diego region and SDREN's portfolio strategy. These driving characteristics include: (1) a strong emphasis on equity and serving underserved and HTR communities; (2) targeted investment in market support activities, particularly workforce development and public sector capacity-building, to address structural and workforce barriers to decarbonization; and (3) a focused, complementary approach to resource acquisition that prioritizes peak demand reduction and total system benefit that fills gaps within SDG&E's broader resource acquisition efforts. These budgetary priorities are informed by SDREN's regional market assessment, equity mapping and extensive engagement with local governments, community-based organizations and other regional stakeholders. Further, they reflect SDREN's role as a REN designed to fill gaps in existing offerings, respond to local needs and coordinate with other program administrators to maximize ratepayer value.

For the first four years of the Plan, SDREN's budget request reflects the continuation of programs previously authorized by the Commission, with funding levels calibrated to support full program implementation, expected participation and delivery costs. In developing its initial four-year budget request, SDREN leveraged the same core analytical inputs used in its prior application.

These estimates are supported by the prices SDREN received through its competitive bidding process for program implementers, which align with the cost assumptions included in the previously approved Business Plan. SDREN developed its program-level budgets by evaluating anticipated participation rates, delivery models (e.g., direct install, technical assistance, NMEC-based resource acquisition), incentive levels where applicable, and regional cost drivers such as labor, materials and outreach needs. The resulting budget allocations are consistent with those approved for comparable REN portfolios in other IOU territories and are designed to deliver measurable customer and system benefits.

For the second four-year period of the Strategic Business Plan, SDREN applied a uniform three percent annual escalation factor across the portfolio. This escalation reflects a reasonable assumption for anticipated increases in labor, materials, and program delivery costs over time, as well as expected growth in customer participation as electrification and decarbonization activity accelerates regionwide. Applying a consistent escalation factor across programs preserves budget stability, supports steady-state operations and ensures SDREN can continue to serve priority communities effectively throughout the full eight-year period.

Taken together, SDREN's proposed budget is reasonable, proportionate to the scope of services proposed and consistent with Commission policy and precedent for REN portfolios. The budget reflects a careful balance between equity-focused investments, market support activities, and targeted resource acquisition, while simultaneously maintaining cost discipline and maximizing the value delivered to San Diego County ratepayers.

V. THE COMMISSION SHOULD AUTHORIZE SDG&E TO CONTINUE ACTING AS THE FISCAL AGENT FOR SDREN.

Where the Commission has authorized funding for RENs, the Commission relies upon IOUs as fiscal agents to disperse funds to RENs. In D.23-06-055, the Commission found:

“The IOU role as a fiscal agent for the CCAs and RENs operating within its territory should be limited to collecting and disbursing funds under the direction of the Commission and should not include a compliance and monitoring function.”³⁴

SDREN continues to have a strong working relationship with SDG&E in its role as fiscal agent. SDREN respectfully requests that the Commission continue to authorize SDG&E to act as fiscal agent for SDREN.

VI. POLICY RECOMMENDATIONS

SDREN’s policy recommendations are outlined in Exhibit SDREN – 01: 2028-2031 Portfolio Plan and 2028-2035 Business Plan, Chapter 11: Recommendations for New or Modified Energy Efficiency Policy.

VII. COMPLIANCE WITH THE RULES OF PRACTICE AND PROCEDURE

A. Commission Authority for Filing the Application – Rule 2.1

SDREN files this Application in accordance with D.21-05-031, Ordering Paragraph 5, and D.23-06-055, Ordering Paragraph 2, which directed all energy efficiency PAs to file energy efficiency business plan and portfolio applications every four years by February 15, beginning in 2022.³⁵ The Commission granted an extension to SDREN and all other PAs for this cycle of applications, allowing applications to be filed no later than March 16, 2026.³⁶

B. Proposed Scope

SDREN asks the Commission to consider the following issues germane to this Application:

1. Whether the SDREN Strategic Business Plan and Portfolio Plan are reasonable and comply with Commission guidance for REN portfolios.

³⁴ D.23-06-055 at 112, Conclusion of Law 13.

³⁵ D.21-04-031 at 81-82, Ordering Paragraph 5.

³⁶ Letter from Commission Executive Director Rachel Peterson, *Re: Request for Extension of Time to Comply with Decision 21-05-031 Ordering Paragraph 5 and Ordering Paragraph 2 of D.23-06-055*, dated December 15, 2025.

2. Whether the proposed programs, goals, estimated budgets and metrics are reasonable.
3. Whether SDG&E should continue to serve as the fiscal agent for SDREN.
4. Whether the Commission should adopt SDREN's policy recommendations as detailed in Exhibit SDREN – 01.

C. Request for Relief – Rule 2.1

SDREN requests that the Commission:

1. Find that SDREN's Strategic Business Plan and Portfolio Plan are reasonable comply with Commission guidance;
2. Find that SDREN's Strategic Business Plans and Portfolio Plans proposed goals, estimated budget and metrics are reasonable;
3. Approve SDREN's Strategic Business Plan, Portfolio Plan and budget;
4. Direct SDG&E to continue to act as fiscal agent for SDREN and authorize SDG&E to collect and distribute funds accordingly;
5. Adopt SDREN's policy recommendations.

D. Legal Name and Principal Place of Business – Rule 2.1(a)

The legal name and principal place of business of the Applicant is:

SAN DIEGO COMMUNITY POWER
on behalf of the San Diego Regional Energy Network
program (SDREN) (CPUC ID #U-4001-E)
P.O. Box 12716
San Diego, CA 92112-3716

Applicant is a joint powers authority formed under the laws of California.

E. Correspondence and Communication Regarding This Application – Rule 2.1.(b)

All correspondence and communications regarding this Application should be addressed to:

Alissa Greenwald
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F. Categorization – Rule 2.1(c)

SDREN proposes that this Application be categorized as a “ratesetting” proceeding under Rule 7.1(e)(2) because it does not clearly fit into any of the categories as defined by Rules 1.3(a), 1.3(d), and 1.3(e). Energy efficiency applications filed by IOUs meet the definition of “ratesetting” in Rule 1.3(e) because the Commission approves rates for each IOU to collect funds to pay for energy efficiency programs. However, the Commission does not set rates via REN applications because RENs are not in the role of revenue collection for Commission-authorized energy efficiency programs.

G. Need for Hearing – Rule 2.1(c)

SDREN has endeavored to provide a sufficient record via the Application and testimony to obviate the need for evidentiary hearings. Accordingly, SDREN has developed the schedule set forth below to develop a full record without the need for hearings. If the need for hearings arises, SDREN requests that the resulting hearing schedule allow the Commission to render a final decision on this Application with sufficient time to begin program implementation by January 1, 2028.

H. Proposed Schedule – Rule 2.1(c)

SDREN proposes the schedule below for consideration of its Application. To support efficient administration of this multi-party proceeding, SDREN encourages the Commission to consolidate all PA applications and set a common date for protests and responses so that intervenors need only submit one protest or response. Further, SDREN recommends that the Commission solicit intervenor policy recommendations and issue a determination on which policy recommendations will be in scope early in the proceeding. SDREN does not believe hearings will be necessary; however, if hearings are held, hearings should be limited to PA programs and budgets, not policy matters which are better suited for comments or briefing.

Activity	Proposed Schedule
Application Due Date	March 16, 2026
ALJ Ruling Consolidating 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 Recommendations 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

Activity	Proposed Schedule
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

I. Safety – Rule 2.1(c)

In D.16-01-017, the Commission adopted an amendment to Rule 2.1(c) requiring applications to clearly state “relevant safety considerations.” This Application does not raise any safety issues because it is limited to seeking Commission approval of SDREN’s goals, strategies and budget for encouraging its customers to adopt energy savings measures. SDREN may contract with third parties to provide energy efficiency interventions. SDREN’s contracts with third-party energy efficiency contractors will address safety and will provide criteria and requirements for providers to safely operate in compliance with legal and regulatory requirements.

J. Articles of Incorporation – Rule 2.2

San Diego Community Power was established on October 1, 2019, pursuant to the San Diego Community Power Joint Powers Agreement.³⁷ The County of San Diego is a charter county and political subdivision of the State of California. SDREN, a program of SDCP and the County of San Diego, is engaged in the provision of energy efficiency and integrated demand side management programs under the authority granted by the Commission.

³⁷ Community Power was originally established and known as the San Diego Regional Community Choice Energy Authority. The agency’s name and the title of the JPA Agreement were changed by the First Amendment to the JPA Agreement, dated November 21, 2019.

K. Authority to Increase Rates Not Applicable – Rule 3.2

Rule 3.2 requirements do not apply to this application because SDREN does not collect revenues for energy efficiency programs; rather, energy efficiency funding is collected by SDG&E and allocated to SDREN.

L. Notice and Service of Application

A copy of this 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.22-23-005, *et al.* and Chief Administrative Law Judge Michelle Cooke.

M. List of Supporting Documents

SDREN includes several documents to support this application. The separate Notice of Availability served concurrently with this application includes links to the following documents:

Exhibit SDREN – 01 2028-2031 Portfolio Plan and 2028-2035 Business Plan

Exhibit SDREN – 02 Program Cards

Exhibit SDREN – 03 CEDARS Filing Links and Receipts

VIII. CONCLUSION

SDREN appreciates the Commission's consideration of this Application and for providing SDREN with the opportunity to serve its communities throughout San Diego with these critical and transformative programs. SDREN respectfully requests the Commission expeditiously approve this Application.

Respectfully submitted,

/s/ Alissa Greenwald

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Counsel for:

SAN DIEGO COMMUNITY POWER

on behalf of the San Diego Regional Energy Network

March 16, 2026

APPENDIX A
VERIFICATION

I am an officer of the applicant San Diego Community Power herein, 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 3/6/26 at San Diego California.

/s/ John Clark

John Clark

Chief Operations Officer

San Diego Community Power

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