

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE  
STATE OF CALIFORNIA

COMMISSIONER KAREN DOUGLAS, in attendance

ADMINISTRATIVE LAW JUDGE JULIE A. FITCH and  
VALERIE KAO, co-presiding

Application of Association of Bay ) PREHEARING  
Area Governments (CPUC ID 941) for ) CONFERENCE  
Approval of the Bay Area Regional )  
Energy Network 2028-2031 Portfolio ) Application  
Plan and 2028-2035 Business Plan. ) 26-03-009  
)  
)  
And related matters. ) Applications  
) 26-03-010  
) 26-03-011  
) 26-03-012  
) 26-03-013  
) 26-03-014  
) 26-03-015  
) 26-03-017  
) 26-03-018  
) 26-03-019  
) 26-03-020  
) 26-03-021  
) 26-03-028  
)  
) Consolidated.

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Virtual Proceeding  
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Reported by: Shannon Ross Winters, CSR No. 8916  
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VIRTUAL PROCEEDING

JUNE 19, 2026 - 1:33 P.M.

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ADMINISTRATIVE LAW JUDGE KAO: Let's be on the record.

Good afternoon. This is the remote prehearing conference for the consolidated applications of the Energy Efficiency Portfolio Administrators for Approval of the 2028 through 2031 Portfolio Plans and the 2028 through 2035 Business Plans. The proceeding number is A.26-03-009, et al.

Today is June 19, 2026. I want to acknowledge that this day in 1865 marked the end of slavery in this country, and Juneteenth became a federal holiday in 2021.

In 2024 Governor Newsom proclaimed a Juneteenth Day of Observance and confirmed that California recognizes Juneteenth as an official state holiday. For state employees, Juneteenth is an optional holiday as opposed to a state holiday for which we automatically get paid time off.

Several parties requested to reschedule this prehearing conference because their offices are closed and honor Juneteenth. Unfortunately, the Commission's hearing calendar is very full in June, and this was the

1 only date we could get without significantly delaying  
2 the prehearing conference.

3 Parties were afforded the option to file a  
4 prehearing conference statement in lieu of appearing at  
5 this preparing conference, and we will consider those  
6 statements in developing the scope and schedule for this  
7 proceeding.

8 I am Administrative Law Judge Valerie Kao. I  
9 am co-assigned to this proceeding with Administrative  
10 Law Judge Julie Fitch. Judge Fitch and I will oversee  
11 and manage this proceeding in consultation with the  
12 assigned commissioner, Karen Douglas, and her advisors.  
13 Commissioner Douglas is with us today and would like to  
14 make a few opening remarks.

15 I will now turn it over to Commissioner  
16 Douglas.

17 COMMISSIONER DOUGLAS: Thank you very much,  
18 Judge Kao and also Judge Fitch, for your work on this  
19 proceeding and for presiding over this prehearing  
20 conference and the work going forward.

21 I'd also like to thank the parties for their  
22 participation today and during the time of the  
23 proceeding. I'm looking forward to just hearing the  
24 discussion today and as we go forward. That's really  
25 all I wanted to say by way of helping open this up.

1 Thank you.

2 ALJ KAO: Thank you, Commissioner Douglas.

3 The purpose of today's prehearing conference is  
4 to address the procedural matters, including the scope  
5 of issues, schedule, categorization, and need for  
6 hearing.

7 Judge Fitch will lead the discussion on scope,  
8 and then I will address the remaining procedural issues.  
9 We will not make any final rulings today regarding scope  
10 or schedule. Commissioner Douglas, as the assigned  
11 commissioner, will decide those matters in the scoping  
12 memo after considering your input today.

13 For the benefit of our court reporters, I'd  
14 like to remind everyone to mute yourself unless you're  
15 called upon to speak, speak clearly and slowly, and  
16 please do not interrupt each other. Note, however, that  
17 the court reporters may interrupt you if you're speaking  
18 too quickly or if they need you to repeat something.

19 As stated in the May 14, 2026, ruling, we will  
20 not entertain oral motions for party status. As far as  
21 I'm aware, there are not any outstanding motions for  
22 party status at the moment, but pursuant to Article 1.4  
23 of the Commission's Rules of Practice and Procedure, if  
24 you filed comments in response to any or all of the  
25 consolidated applications, you're already a party to the

1 proceeding.

2 For anyone attending this prehearing conference  
3 who is not yet a party, if you wish to become a party to  
4 the proceeding, you can do so by submitting a written  
5 motion for party status in accordance with Rule 1.4 of  
6 the Commission's Rules of Practice and Procedure.

7 There are some templates and information for  
8 how to file and serve documents in a proceeding  
9 available on the Commission's website, and I will  
10 endeavor to put those website addresses in the chat box.

11 If you wish to just follow the proceeding but  
12 not become a formal party, you have two options. You  
13 can request to be added to the service list as  
14 "Information Only," which means you will be on the  
15 distribution list that we and all parties use to serve  
16 documents that are filed in the proceeding docket. You  
17 can do this by completing and submitting an "Addition to  
18 Service List Form" to the Commission's Process Office,  
19 and I will also put that address in the chat box.

20 The second option is to subscribe to receive  
21 notice of documents that are published in this  
22 proceeding's docket. You can do that by visiting  
23 [subscribecpuc.cpuc.ca.gov](http://subscribecpuc.cpuc.ca.gov). I will also try to put that  
24 in the chat box. I am unable to put that -- let me just  
25 repeat the address again for our subscription service.

1 The address is subscribecpuc.cpuc.ca.gov.

2 We also remind parties that we encourage and  
3 require participation in order to develop a clear and  
4 robust record in order to arrive at a decision. If you  
5 do not actively participate or make substantial  
6 contributions to the record, we may remove your party  
7 status, in which case you would stay on the service list  
8 but as "Information Only."

9 Next, we'll do a round of appearances. In the  
10 last few days, a speaking order was emailed out to those  
11 who asked for an opportunity to speak today. As I call  
12 your name, please state your presence for the record by  
13 responding "present." Note that we are only listing  
14 those representatives and parties that have indicated  
15 they wish to make comments today, so this may not be an  
16 exhaustive list of all the formal parties. We have  
17 confirmed that an expedited transcript has been ordered  
18 for this prehearing conference.

19 First, on behalf of Pacific Gas and Electric  
20 Company, or PG&E, Eric Sezgen.

21 MR. SEZGEN: Present, your Honor. Thank you.

22 ALJ KAO: Thank you. On behalf of Southern  
23 California Edison, or SCE, Elena Kilberg.

24 MS. KILBERG: Present, your Honor.

25 ALJ KAO: Thank you. On behalf of San Diego

1 Gas & Electric, or SDG&E, Rebecca Hansson.

2 MS. HANSSON: Present, your Honor.

3 ALJ KAO: Thank you. On behalf of Southern  
4 California Gas Company, or SoCalGas, Jeff Fohrer.

5 MR. FOHRER: Present, your Honor.

6 ALJ KAO: Thank you. On behalf of Bay Area  
7 Regional Energy Network, or BayREN, and Tri-County  
8 Regional Energy Network, or 3C-REN, Sheridan Pauker.

9 MS. PAUKER: I'm present, your Honor.

10 ALJ KAO: Thank you. On behalf of Southern  
11 California Regional Energy Network, or SoCalREN, Lujuna  
12 Medina.

13 MS. MEDINA: Present, your Honor.

14 ALJ KAO: Thank you. On behalf of Western  
15 Riverside Council of Governments, Administrative Lead  
16 Agency for Inland Regional Energy Network, or I-REN,  
17 Benjamin Druyon.

18 MR. DRUYON: Present, your Honor.

19 ALJ KAO: Thank you. On behalf of San Diego  
20 Regional Energy Network, or SDREN, Alissa Greenwald.

21 MS. GREENWALD: Present, your Honor.

22 ALJ KAO: On behalf of Redwood Coast Energy  
23 Authority representing Northern California Rural  
24 Regional Energy Network, or NREN, Susie Berlin.

25 MS. BERLIN: Present.

1 ALJ KAO: Thank you. On behalf of Central  
2 California Rural Regional Energy Network, or CCR REN,  
3 Melissa Brandt.

4 MS. BRANDT: Present, your Honor.

5 ALJ KAO: Thank you. On behalf of Marin Clean  
6 Energy, or MCE, Wade Stano.

7 MR. STANO: Present, your Honor.

8 ALJ KAO: Thank you. On behalf of Peninsula  
9 Clean Energy, Nikhil Vijaykar.

10 MR. VIJAYKAR: Thank you, your Honor. I'm  
11 here.

12 ALJ KAO: Thank you. On behalf of California  
13 Choice Energy, or CalChoice, Jessica Melms.

14 MS. MELMS: Present, your Honor.

15 ALJ KAO: Thank you. On behalf of Small  
16 Business Utility Advocates, or SBUA, Luke May.

17 MR. MAY: Hello. This is Luke May. Present.

18 ALJ KAO: Thank you. This will be a long one.  
19 On behalf of California State Association of Electrical  
20 Workers; Western States Council of Sheet Metal, Air,  
21 Rail, and Transportation Workers; California State Labor  
22 Management Cooperation Committee for the International  
23 Brotherhood of Electrical Workers and the National  
24 Electrical Contractors Association; Joint Committee on  
25 Energy and Environmental Policy; and California State

1 Pipe Trades Council, or "Joint Parties" collectively,  
2 Kevin Carmichael.

3 MR. CARMICHAEL: Present. Thank you, your  
4 Honor.

5 ALJ KAO: Thank you. On behalf of Rising Sun  
6 Center for Opportunity, Julia Hatton.

7 MS. HATTON: Present, your Honor.

8 ALJ KAO: Thank you. On behalf of Natural  
9 Resources Defense Council, or NRDC, Erika Flores.

10 MS. FLORES: Present, your Honor.

11 ALJ KAO: Thank you. On behalf of the Public  
12 Advocates Office at the Public Utilities Commission, or  
13 Cal Advocates, David Gibbs.

14 MR. GIBBS: Present, your Honor.

15 ALJ KAO: Thank you. On behalf of The Utility  
16 Reform Network, Ruthie Lazenby? Lazenby?

17 MS. LAZENBY: Lazenby, yes. Present, your  
18 Honor. Thank you.

19 ALJ KAO: Thank you, Ms. Lazenby. And on  
20 behalf of Greenlining, Carmelita Miller.

21 MS. MILLER: Present, your Honor.

22 ALJ KAO: Thank you all very much.

23 ALJ FITCH: This is Judge Fitch. I'm going to  
24 take it from here and start to talk about scope.

25 Thank you all for being here today and

1 participating. First, I want to thank everyone for the  
2 thoughtful comments and replies in response to the  
3 applications, along with the several prehearing  
4 conference statements that we received. The judges and  
5 the staff have all read all of these materials already,  
6 and we appreciate the effort and thinking that went into  
7 them.

8 I'll also note that Energy Division staff  
9 exhaustively summarized for us all of the policy  
10 proposals and issues that were raised in the  
11 applications and in the responses to them, and I must  
12 say it's a very long list. Some of that is totally  
13 understandable.

14 These applications represent the manifestation  
15 of Commission direction on energy efficiency over the  
16 past many years and include plans of a set of 12 unique  
17 existing portfolio administrators and one new one --  
18 potential new one. All of these administrators or  
19 potential administrators have done their best to address  
20 all of the rules and requirements that the Commission  
21 has. There are also many areas of energy efficiency  
22 where policy is continuing to evolve significantly.

23 At the same time, we're focusing on keeping the  
24 scope and schedule of this proceeding streamlined enough  
25 that the portfolio administrators will be able to

1 successfully launch a new approved portfolio of programs  
2 by the beginning of 2028, which means that we need a  
3 Commission decision resolving all of the issues in scope  
4 by sometime in the summer of 2027, so roughly a year  
5 from now. So our long list of issues probably has to be  
6 culled somewhat to propose a manageable scope and  
7 schedule.

8           As most of you know, earlier this week I  
9 emailed out to the service list in this proceeding a  
10 proposed scope and schedule. We're hoping that everyone  
11 who is here to speak today will comment on that proposal  
12 and help us move to a final scope and schedule that will  
13 be included in the assigned commissioner's scoping memo.

14           I'm going to say a few things about why that  
15 proposal is, how it is, and then I'll ask folks to  
16 comment on it. To develop that draft that was emailed  
17 out, we asked ourselves a few key questions to decide  
18 whether an issue should be part of the scope or not.

19           I'll also say what was emailed out, which I'm  
20 going to read into the record shortly, is preliminary,  
21 and we very much want your feedback on it today.

22 There's a lot of gray area here. It was very much a  
23 draft. We intend to consider everything that is said  
24 today before we finalize the scope.

25           Having said that, the first question that we

1 asked ourselves is whether an issue or a proposal might  
2 be already being addressed in another venue. If so, in  
3 most cases like that, we propose that that issue be out  
4 of scope for this proceeding. An example of that would  
5 be the consideration of whether, how, and which  
6 nonenergy impacts should influence cost-effectiveness  
7 determinations. We understand some stakeholders have  
8 raised that already in the Distributed Energy Resources  
9 Rulemaking, which is our 22-11-003.

10 The next question was whether an issue or a  
11 proposal might be something that's holistic in nature or  
12 sets policy for all administrators for energy efficiency  
13 in a certain area. An example of this would be updating  
14 the Energy Efficiency Policy Manual. These kinds of  
15 issues can be addressed probably more appropriately in  
16 the ongoing rulemaking proceeding, which is R.25-04-010,  
17 or a successor.

18 Next, we asked ourselves if there were  
19 proposals that address the governance structure for  
20 energy efficiency, such as the "bus stops," quote,  
21 unquote, for the Database for Energy Efficiency  
22 Resources, or the role of the California Energy  
23 Efficiency Coordinating Committee.

24 These are examples of issues that are more  
25 appropriate for the rulemaking and probably not these

1 applications. There are also a number of issues that  
2 were already scoped into the rulemaking, for example,  
3 treatment of multifamily projects.

4 And then finally there were a number of  
5 proposals that would seek to modify the rules or metrics  
6 by which some or all of the administrator's proposals  
7 are judged in this proceeding. An example of this would  
8 be modifying the applicability of cost-effectiveness  
9 requirements to the regional energy network proposals.

10 While some of those proposals definitely merit  
11 consideration, we would propose to also do that in the  
12 rulemaking and those sorts of things so that they may be  
13 applied on a going-forward basis in the next set of  
14 portfolios.

15 Basically, we didn't consider it fair to  
16 consider changing those types of rules in this  
17 application when the administrator's constructed their  
18 applications based on the Commission's existing set of  
19 rules that were already in place and that they expected  
20 to be applied to their proposals.

21 As I said a little bit earlier, some of these  
22 questions are not black and white, and there's  
23 definitely considerable room for interpretation of what  
24 should fall into the category of in scope or out of  
25 scope.

1           But in general, eliminating the types of issues  
2 that I just mentioned results in a proposed focus in  
3 this proceeding on the portfolios and programmatic  
4 proposals of the administrators and any other issues  
5 that have direct applicability to those portfolios and  
6 their composition, as well as their implementation.

7           I also want to quickly note a few things that  
8 we're already aware of that could have an impact on the  
9 proposals that are already before us in these  
10 applications.

11           The first is the set of issues already under  
12 consideration in the Energy Efficiency Rulemaking  
13 related to Commission policy on incentives for natural  
14 gas energy efficiency measures.

15           I want to acknowledge that if a decision is  
16 adopted in the rulemaking that has a significant impact  
17 on direction in the energy efficiency portfolios, we  
18 would plan to have or create an opportunity for the  
19 portfolio administrators in this proceeding to provide  
20 specific information about what they would propose to  
21 change in their applications as a result of any new  
22 Commission policy on natural gas incentives in the  
23 rulemaking. We have not specifically provided that  
24 opportunity in the draft schedule, but we would slot it  
25 in in the future if it becomes warranted.

1           Similarly, most parties know there is an  
2 application pending from San Diego Gas & Electric  
3 Company, which is Application 25-04-014, to withdraw  
4 from administering regional energy efficiency programs  
5 in their territory.

6           If the Commission adopts a decision in that  
7 proceeding that has an impact on SDG&E's portfolio  
8 submitted here in this application proceeding, we will  
9 give SDG&E, and potentially other portfolio  
10 administrators, the opportunity to make programmatic  
11 adjustments in this proceeding, so this may or may not  
12 be necessary depending on the outcome in SDG&E's  
13 application.

14           Third, we're aware that the California Air  
15 Resources Board has rules on the phase-out of fossil  
16 fuel space and water heating that could have an impact  
17 here on the measures that are available to be offered in  
18 the portfolios before us in these applications.

19           And then finally, on a more administrative  
20 note, we've also become aware of an error that was  
21 embedded in the Commission's cost-effectiveness tool  
22 that was used by the administrators or potential  
23 administrators to submit cost-effectiveness estimates in  
24 these applications. My understanding is that the error  
25 is related to the avoided cost inputs and probably has a

1 relatively minor overall impact, although it may have  
2 more of an impact on fuel substitution programs.

3 We're likely to make a provision for the  
4 applicants here to file corrected versions of their  
5 cost-effectiveness tool outputs using the corrected tool  
6 in the very near future. Likely we'll do this after the  
7 scoping memo but well before testimony is due, so the  
8 parties may comment on and incorporate the new  
9 cost-effectiveness information into their analysis.

10 So having said all that, I'm now going to  
11 quickly summarize the proposed scope that we arrived at  
12 based on my overall description just now and then take  
13 parties' comments on it. I also emphasize, again, that  
14 this is preliminary and will be informed by everyone's  
15 comments today and that the ultimate scope will be  
16 determined by the assigned commissioner in the scoping  
17 memo.

18 So the proposed scope that we sent out earlier  
19 this week that we'd like you to comment on now had  
20 several categories. The first is, as I mentioned, there  
21 are threshold issues that could impact this proceeding  
22 and the portfolios over all, those being the  
23 consideration of policy for natural gas incentives in  
24 the rulemaking, as well as SDG&E's application to  
25 withdraw from administering regional energy efficiency

1 programs, so those are just acknowledged to have  
2 potential impact overall.

3 Issues that we would propose to take up in the  
4 rulemaking -- and not in this proceeding but in the near  
5 future -- are several issues that were raised in policy  
6 change recommendations in the applications or the  
7 responses to them, two categories, one being application  
8 and implementation of cost-effectiveness requirements  
9 within the energy efficiency portfolio, as well as  
10 regional energy network policies and oversight tools.

11 Those two broad topics we would propose to  
12 prioritize in the rulemaking, but not take up here in  
13 the portfolio proceeding.

14 There are several other issues we proposed as  
15 appropriate for the rulemaking, maybe at a slightly  
16 longer time frame, those being:

17 Whether the Commission should address Workforce  
18 Quality Standards and/or High Road Job Creation in the  
19 context of energy efficiency, beyond the workforce,  
20 education, and training programs that are in the current  
21 portfolio;

22 Updates to the Energy Efficiency Policy Manual;  
23 Changes to the role of the California Energy  
24 Efficiency Coordinating Committee;

25 Potential changes to the evaluation,

1 measurement, and verification activities, including  
2 fiscal oversight, annual statewide studies, streamlining  
3 of the CEDARS database, reporting requirements, and  
4 existing data systems;

5 Any potential revisions to the Database for  
6 Energy Efficiency Resources resolution process or the  
7 "bus stop" schedule;

8 Treatment of multifamily projects;

9 And then any custom project review process  
10 changes unless we specifically talk about them in the  
11 proposed scope here in this proceeding.

12 And then a few issues that we were proposing to  
13 just not have in scope at all, one is the proposed  
14 moratorium on new RENs, or regional energy networks. We  
15 think we have a statutory obligation there that we can't  
16 ignore, so we would propose not to take that up;

17 Changes to the applicability or primacy of  
18 different cost-effectiveness tests. That's something  
19 that we think that Distributed Energy Resources  
20 Rulemaking is poised to address not here;

21 Changes in the applicability of the  
22 cost-effectiveness requirements for different segments  
23 of the portfolio. In that case, that's something that  
24 was relatively recently decided, and we would propose  
25 not to revisit it right now;

1           Elimination of individual programs solely on  
2 the basis of cost-effectiveness, in isolation from  
3 consideration of their role in the overall portfolio.  
4 That's more because it's a long-standing Commission  
5 policy about treating the portfolios as a portfolio and  
6 not individually based on program cost-effectiveness;

7           Next one is whether energy efficiency funding  
8 should be allowed to be used for event-based demand  
9 response. That's another long-standing policy issue  
10 that we would propose not to revise;

11           And then finally, development of general  
12 non-energy benefits, which we think is better done  
13 elsewhere. So with all of those things proposed as not  
14 in scope, the proposed scope is the following:         ]

15           First of all, on Budget:

16           1. Are the portfolio administrators' budgets  
17 individually and collectively just and reasonable,  
18 appropriate, and will they accomplish the energy savings  
19 and Total System Benefit goals;

20           2. Do the proposed budgets and forecasts  
21 provide sufficient flexibility to accommodate changes to  
22 Total System Benefit goals that may result from the  
23 anticipated revisions to the California Air Resources  
24 Board's rules on fossil fuel space and water heating;  
25 and if not, should the Commission consider processes to

1 adjust budgets accordingly, if needed?

2 The second category is Goals and

3 Accountability:

4 3. Are portfolio administrator forecasts of  
5 energy savings, greenhouse gas reductions, Total System  
6 Benefit, and cost-effectiveness reasonable and aligned  
7 with state policy;

8 4. Do the proposed portfolios meet all of the  
9 Commission's requirements that were already in place at  
10 the time of the applications?

11 A compliance check: Are you bringing us what  
12 we asked for?

13 5. Whether to adopt the Total System Benefit  
14 metrics for codes and standards programs.

15 The next category is Program Proposals:

16 6. Should the individual program proposals  
17 from each portfolio administrator be approved by the  
18 Commission;

19 7. Should the portfolio consolidate program  
20 delivery types in new ways such as customer-based and  
21 sales-based as a proposal;

22 8. Can programs with similar features be  
23 consolidated into unified delivery structures to reduce  
24 administrative complexity, and which ones and how?

25 The next category is about Portfolio Mechanics:

1           9. Whether to revise timelines for the True-Up  
2 advice letters and business plan applications;.

3           10. Whether to amend the pilot requirements  
4 that were set out in D.09-09-047;

5           11. Is about the approach to crediting Total  
6 System Benefit generated by non-investor-owned  
7 utilities towards the investor-owned utility Total  
8 System Benefit goals.

9           The next category is Statewide Programs:

10          12. Potential revisions to statewide program  
11 rules, including:

12           Counting of non-investor-owned-utility led  
13 statewide budgets towards IOU portfolio budget  
14 requirements;

15           The funding process for statewide programs led  
16 by non-investor-owned utilities;

17           Investor-owned utilities statewide percentage  
18 requirement, the process for adding or removing a  
19 program from the statewide portfolio;

20           Process for selecting a statewide  
21 administrator; and

22           Inclusion of natural gas measures from  
23 terminated statewide programs in local midstream and  
24 upstream programs.

25          The next category is Third Party Procurement:

1           13. Which is about potential modifications to  
2 investor-owned-utilities' third-party program  
3 requirements, including:

4           Outsourcing thresholds;

5           Definition of a third-party program; and

6           Triggers for solicitation review by procurement  
7 review groups, independent evaluators, and advice letter  
8 submissions.

9           The next category is Equity:

10          14. Potential changes to the definition of  
11 equity customers.

12          15. Whether and how to adjust the eligibility  
13 and funding thresholds related to serving equity  
14 customers, including aligning customer-targeting  
15 requirements for Regional Energy Networks.

16          The next category is Market Support:

17          16. Whether to increase the loan cap on the  
18 on-bill-financing loan programs.

19          The next category is Integrated Demand-Side  
20 Management issues:

21          17. Should the Integrated Demand-Side  
22 Management approach outlined in decision D.23-06-055 and  
23 Resolution E-5387 be continued in the next four-year  
24 cycle; and, if so, at what funding levels;

25          18. Other general updates to the Integrated

1 Demand-Side Management definitions and policy framework.

2 I'm almost done. I promise. Last category,

3 Building Decarbonization Issues:

4 19. Should energy efficiency funding be

5 allowed to be used to encourage fuel switching from

6 nonregulated fuels to regulated fuels, natural gas or

7 electricity or both;

8 20. Whether to allow Total System Benefit

9 claims for standalone low-global-warming-potential

10 refrigerant measures;

11 21. Treatment of infrastructure costs at the

12 customer site to facilitate electrification or encourage

13 right-sizing of energy efficiency measures.

14 Okay. So that's the proposed scope that we

15 sent out earlier this week. And, now, I'm going through

16 the list of speakers and giving each of you an

17 opportunity to respond to anything I just said or the

18 proposed scope that was emailed out, and if you can keep

19 your responses in the neighborhood of three minutes,

20 that would be great.

21 And as I mentioned earlier, we've already read

22 all the written materials filed by parties; so no need

23 to feel compelled to repeat points that you've already

24 made in your written materials, but, of course, you may

25 wish to emphasize certain aspects.

1           We're particularly interested in what issues  
2 you prioritize and also whether you think we've missed  
3 anything that needs to be emphasized or scheduled into  
4 the proceeding.

5           And, finally, feel free to refer to another  
6 party's comments if you agree with them and don't feel  
7 the need to repeat in detail if the points have already  
8 been made.

9           So with that, I will go to the speakers, and  
10 first up is Mr. Sezgen from PG&E.

11           MR. SEZGEN: Good afternoon, your Honor. Eric  
12 Sezgen speaking for PG&E. PG&E appreciates the  
13 consideration of all the comments that went into making  
14 this proposed scope. PG&E supports the scope as  
15 proposed here.

16           If the Commission is looking for potential ways  
17 to, maybe, shorten it or streamline it, I think a couple  
18 of these, maybe Integrated Demand-side Management  
19 on-bill financing, do have all of the issues associated  
20 with them, and maybe could be addressed in the policy  
21 rulemaking, but other than that, PG&E supports how  
22 everything is scoped here. So I'll keep the comments  
23 short.

24           ALJ FITCH: Okay. Thank you very much.

25           MR. SEZGEN: Thank you.

1 ALJ FITCH: We'll move next to Ms. Kilberg from  
2 Southern California Edison.

3 MS. KILBERG: Can you hear me?

4 ALJ FITCH: Yes, we can.

5 MS. KILBERG: Perfect. Okay. Thank you so  
6 much. SCE appreciates this opportunity to provide input  
7 on the draft scoping issues document. I'll note that  
8 our application includes several important reform  
9 proposals that are designed to optimize SCE's portfolio  
10 performance, advance affordability, and reduce  
11 administrative complexity and cost.

12 So these are a priority for us, and I'm just  
13 going to highlight a few items in the draft scoping  
14 issues document where we were hoping for a little bit of  
15 clarification and where we thought the item may have  
16 been omitted inadvertently.

17 So, first, I wanted to turn to issue number 15,  
18 and on that one, we were hoping to better understand the  
19 scope of that issue, and, specifically, to clarify what  
20 is meant by "funding thresholds related to serving  
21 equity customers."

22 And the reason we wanted to get a little more  
23 information on this one is given that the RENs'  
24 portfolios are comprised primary of equity programs, we  
25 wanted to better understand whether this topic includes

1 considerations of potential budget limits on the RENs'  
2 equity spending.

3           We did note in our application the significant  
4 growth in the REN budgets since 2013, now exceeding one  
5 billion dollars combined. And we understand that  
6 according to some parties' estimates, if all these  
7 proposed budgets were approved, then the majority, or  
8 over 60 percent, of energy efficiency spending in  
9 California over the next four years is forecast to be  
10 non-cost-effective. And this is notwithstanding SCE's,  
11 approximately 40 percent reduction in its EE portfolio  
12 budget as compared with the previous cycle, and a  
13 projected overall portfolio TRC of 1.43.

14           I'll state that SCE very much recognizes and  
15 appreciates the RENs' important role in serving equity  
16 customers in California, but at the same time, back in  
17 2021, the Commission underscored the, quote, "need to  
18 ensure reasonable cost for market support in equity  
19 segments," given that these segments are not subject to  
20 a cost-effectiveness requirement.

21           Accordingly, SCE does support PG&E's proposal  
22 to initiate a Commission-directed stakeholder process to  
23 develop a REN cost-control policy as part of this  
24 proceeding. And this policy, ideally, would  
25 appropriately balance the REN's equity-focused role with

1 the need to ensure reasonable cost for equity programs.

2           Next, the one item that was not listed  
3 specifically in the draft scoping issues was  
4 net-to-gross reform. This is also a priority item for  
5 SCE, and it was explained in our application.

6           I'm going to note that since we submitted our  
7 application, multiple key stakeholders indicated that  
8 they support net-to-gross reform, as we proposed, or  
9 some other modifications, but we didn't see it listed.

10           Specifically, what we propose is that new  
11 energy efficiency programs and custom projects should be  
12 assigned a default and NTG ratio of 1.0 to be modified  
13 if free ridership is demonstrated. We think that  
14 current practice of assigning legacy discounted values  
15 to new third-party programs results in immediate and  
16 inappropriate discounting.

17           And we think that, if adopted as part of -- if  
18 this reform is adopted as part of this application  
19 proceeding, it has the potential to expand third-party  
20 program offerings for customers and also help  
21 third-party implementers succeed.

22           And, lastly, I will note that we very much  
23 support inclusion of issue number 13, "Third-Party  
24 Procurement Reform." As noted in our application, we  
25 proposed that the third-party outsourcing threshold be

1 reduced to 20 percent or that in the alternative, the  
2 Commission consider broadening the definition of  
3 "third-party program," and the purpose was to give  
4 IOU PAs more control over their portfolios, while also  
5 enabling smaller and less sophisticated third parties to  
6 participate in the energy efficiency marketplace even if  
7 their role is limited to program execution.

8           So those are the main items I wanted to  
9 highlight, and I appreciate the opportunity to address  
10 them. Thank you.

11           ALJ FITCH: Thank you. Just in response to  
12 your question about item 15, I think, without endorsing  
13 everything that you said, I think generally the topic of  
14 the appropriateness of the budget for equity programs  
15 overall and like some, you know, metrics by which to  
16 judge that appropriateness is what we meant there. So,  
17 I think, much of what you were talking about would be  
18 considered in scope, just to respond to that one.

19           On the net-to-gross reform, we'll take that  
20 back. I think that might have been something we were  
21 thinking was more appropriate for the rulemaking, but I  
22 understand your points, and we'll take that under  
23 consideration.

24           MS. KILBERG: Thank you very much.

25           ALJ KAO: Next we'll go to Ms. Hansson from

1 SDG&E.

2 MS. HANSSON: Thank you, your Honors.

3 SDG&E does not object to the issues proposed to  
4 be included in this proceeding. SDG&E does, however,  
5 feel strongly that the scoping issues on the application  
6 and implementation of cost-effectiveness requirement and  
7 changes and/or clarifications to the role of the  
8 California Energy Efficiency Coordinating Council should  
9 be considered by the Commission.

10 Such to the extent that those issues are  
11 excluded here, they should be included in the scope of  
12 rulemaking, as well as actually addressed in that  
13 rulemaking. With that clarification, SDG&E does not  
14 object to the exclusion of those issues here. Thank  
15 you, your Honor. SDG&E has no additional comments.

16 ALJ FITCH: Okay. Thank you. And just to  
17 clarify, I think both of those issues were in the list  
18 of rulemaking topics that we had proposed to take up  
19 there.

20 So we'll move to Jeff Fohrer from SoCalGas.

21 MR. FOHRER: Thank you, your Honor. I will try  
22 to be brief. We don't object to any of the issues in  
23 the draft scope. We know a lot of work went into it,  
24 and we're very appreciative of those. Similar to  
25 Southern California Edison, we have a similar point of

1 clarification on issue 15: Specifically, whether the  
2 funding thresholds are related to certain equity  
3 customers is in reference to the 30 percent equity, the  
4 market support budget cap.

5 And I believe that came from -- I think it was  
6 two EE portfolio cycles ago, decision D.21-05-031,  
7 Ordering Paragraph 4. So that's, again, the similar  
8 point of clarification on issue 15 in the draft scope,  
9 and with that, I will yield the rest of my time to the  
10 group. Thank you.

11 ALJ FITCH: Thank you.

12 We'll move to Ms. Pauker.

13 MS. PAUKER: Good afternoon, Commissioner  
14 Douglas and your Honors. I'm Sheridan Pauker  
15 representing the Association of Bay Area Governments on  
16 behalf of BayREN and the County of Ventura on behalf of  
17 3C-REN and also collectively referred to as the "Joint  
18 RENs" in these statements today. Thank you so much for  
19 the opportunity to weigh in on the scope of this  
20 proceeding.

21 BayREN and 3C-REN support the application's  
22 focused scope for this proceeding, as circulated by the  
23 ALJs on June 15, because it's centered on whether  
24 Portfolio Administrators' next portfolios, budgets, and  
25 business plans meet applicable legal requirements as of

1 their filing dates, and it excludes wide-reaching policy  
2 proposals that would restructure the delivery of EE  
3 programming and would likely take more than one year to  
4 resolve.

5 An important concern -- and we appreciate your  
6 Honors' attention to this -- is enabling a final  
7 decision by June 2027 in order to allow the PAs  
8 sufficient time to enter into contracts to implement the  
9 next portfolio cycle by January 1, 2028. So thank you  
10 for that.

11 BayREN and 3C-REN support the inclusion in the  
12 draft scope of several of the operational modifications  
13 that we're categorizing them as -- they can be resolved  
14 within the next year -- such as the extension of the  
15 IDSM process, the statewide administrator funding  
16 mechanics issues, and the inclusion of  
17 low-global-warming-potential refrigerant replacement  
18 within the EE programming. So thank you for including  
19 those in your draft.

20 The joint RENs support the ALJs' proposed  
21 exclusion of broad changes to cost-effectiveness policy  
22 and REN portfolio allocation from the scope of this  
23 application docket. Cost-effectiveness was already  
24 scoped into the rulemaking, R.25-04-010. And as Judge  
25 Fitch pointed out, and a rulemaking proceeding is a

1 better means of addressing these fundamental changes  
2 that SoCal Edison, PG&E, and Cal Advocates have  
3 proposed. The Joint RENs agree that several of these  
4 should be out of the scope entirely as Judge Fitch  
5 mentioned in the draft, and so we appreciate that.

6 I'm just going to speak to scoping issue 15  
7 because there is some discussion there. Within that,  
8 the idea of creating new allocations and percentages,  
9 and the sub-issue that was there that's aligning  
10 customer-targeting requirements for REN, those are  
11 issues we believe should be addressed in this rulemaking  
12 wholistically so that REN criteria that limit what  
13 RENs -- what kind of programming they can do is  
14 addressed at the same time as percentages of portfolios,  
15 and that we feel that's a broader -- you know, merits a  
16 broader stakeholder discussion. ]

17 There were a few issues that were not included  
18 in the draft scope that we thought were not  
19 controversial in pleadings and could be addressed within  
20 the next year and then could be implemented in the next  
21 portfolio cycle. So, similar to the comments about net  
22 to gross, BayREN and 3C-REN thought that alignment of  
23 net-to-gross treatment to address equity issues would be  
24 helpful to address now in this docket.

25 The exclusion of participant costs from the

1 measurement of N-MEC is something we thought could be  
2 addressed quickly and have a big impact, and refinements  
3 to the "Hard to Reach" definition, such as the inclusion  
4 of access and functional needs and medical baseline  
5 customers, as well as just some refinements to the  
6 geographical exclusions could potentially be addressed  
7 within a year.

8           With respect to draft scoping number two that  
9 your Honor mentioned relating to CARB, BayREN and 3C-REN  
10 believe that CARB action -- more action and more  
11 concrete action needs to be taken before this issue can  
12 be addressed in this docket.

13           And so the Joint RENs recommend that the  
14 Commission adopt a limited process to update the total  
15 system benefit, or TSB, goals portfolio, forecasts, and,  
16 where necessary, budgets only if CARB's final rules  
17 materially depart from the assumptions that were used in  
18 the adopted potential and goals study.

19           On scoping issue number five regarding whether  
20 to adopt the TSB for codes and standards programs, this  
21 appears to be something that would just be applicable to  
22 the IOU PAs and not the RENs. And so we'd ask that the  
23 scoping memo clarify this and specify that it's for  
24 codes and standard programs with claims.

25           Again, thank you very much for this

1 opportunity, and I'll reserve my remaining time for  
2 round two. Thank you.

3 ALJ FITCH: Thank you. Just one clarification  
4 on something you mentioned about the definition of "Hard  
5 to Reach." We meant that to be included in sort of the  
6 superstructure of definition of equity customers. So  
7 all of that would hopefully be in that scope, at least  
8 as proposed. Thanks.

9 We'll move on to Ms. Medina from SoCalREN.

10 MS. MEDINA: Thank you, your Honor.

11 SoCalREN -- I'm Lujana Medina with County of  
12 Los Angeles, Southern California Regional Energy  
13 Network.

14 We agree with PG&E's early comments. There's a  
15 couple of scoping items that could be moved into the  
16 rulemaking of the EE proceeding that will help  
17 streamline and support this kind of expedited decision  
18 making for June 2027 and also to BayREN's comments about  
19 item number two, you know, given that the California Air  
20 Resources Board has kind of taken a step back -- I think  
21 the last meeting was 2025, and they have not made any  
22 indication -- and then also because of public outcry  
23 about energy affordability, I think that particular  
24 topic is still going to be vetted with more due  
25 diligence. Maybe this is something that can be moved

1 into the energy efficiency proceeding.

2           And then the last comment we do want to make --  
3 and we support every other item that you've included in  
4 the proposed draft and scoping memo -- but is to  
5 specific item number 15 under "Equity." You know, one,  
6 I applaud the CPUC for keeping this meeting because we  
7 do want to recognize Juneteenth, and I think it's a  
8 fitting moment to confirm our commitment to a more  
9 equitable energy future, especially for those  
10 communities who have too often waited longest to see its  
11 benefits.

12           When we think about equity -- and I think  
13 what -- there is a disalignment across all the program  
14 administrators -- is how we treat equity programs. And  
15 so contrary to BayREN 3C-REN's comment, I think we do  
16 need to revisit it, should it be restrictive? Like,  
17 should all PAs treat equity programs similarly because  
18 what we do find is that often affluent communities  
19 will take advantage of all programs, including equity.  
20 And so really thinking about how do we ensure that these  
21 who are most vulnerable and likely not to participate  
22 get the most resources.

23           Thank you for allowing me to comment on the  
24 scoping memo.

25           ALJ FITCH: Thank you.

1           Next up is Mr. Druyon on behalf of Inland REN.

2           MR. DRUYON: Thank you, your Honor. I-REN  
3 would love to say thank you to the Commission, the  
4 administrative law judges, and the CPUC staff for their  
5 hard work on this proceeding to get us to this point.

6           I-REN supports many of these issues proposed  
7 for this proceeding, and we strongly support continuing  
8 the IDSM, integrated demand side management, and  
9 upgrading the IDSM policies. IDSM is important to I-REN  
10 public sector agencies to meet resiliency needs, and  
11 more flexibility would help overcome barriers for these  
12 ratepayers.

13           I-REN also supports the changes to the  
14 definition of equity customers. Multiple program  
15 administrators proposed changes that will help recognize  
16 equity communities who are currently excluded. For  
17 example, I-REN recommended the Commission revisit the  
18 geographic criteria for Hard to Reach. Currently the  
19 criteria applies to county level and does not recognize  
20 geographic barriers faced by I-REN's rural communities.

21           Also, I-REN agrees with Judge Fitch's -- that  
22 certain issues are inappropriate now to scope such as  
23 policy changes to this framework of cost-effectiveness.  
24 In general, changes to the threshold policies should not  
25 be part of the approval process for these applications.

1           For over a year, I-REN engaged with communities  
2 and stakeholders to develop our business plan. Based on  
3 that input, I-REN submitted a portfolio according to REN  
4 requirements in effect of the March 16, 2026, rules.

5           THE REPORTER: Excuse me, Mr. Druyon. It's the  
6 court reporter. Could I get you to please slow down  
7 just a skosh. Thank you so much.

8           MR. DRUYON: Sorry, yes. My apologies.

9           THE REPORTER: Thank you. Please continue.

10          MR. DRUYON: Thank you. In closing for my  
11 remarks, I-REN strongly agrees with the remarks of ALJ  
12 Fitch's, that changing the rules for RENs after  
13 applications have been submitted would be unfair. Thank  
14 you. Those are my comments.

15          ALJ FITCH: Thank you. Next we'll go to  
16 Ms. Greenwald on behalf of San Diego REN.

17          MS. GREENWALD: Thank you, your Honor. Alissa  
18 Greenwald on behalf of SDREN. SDREN appreciates the  
19 detail and time that went into preparing the proposed  
20 scope, and particularly that it clearly delineates the  
21 issues to be addressed across this proceeding and across  
22 the Energy Efficiency Rulemaking.

23          SDREN believes that the proposed scope that  
24 your Honor set forth strikes the appropriate balance  
25 between considering the PA's applications and targeted

1 policy updates.

2 SDREN supports the proposed scope of this  
3 proceeding as drafted. SDREN very much agrees with the  
4 Commission's inclination to move consideration of REN  
5 oversight issues into the Energy Efficiency Rulemaking.  
6 This is for two reasons.

7 One is because an organized and efficient  
8 approach to evaluating this issue would require that  
9 consideration of changes to cost-effectiveness policy  
10 come first. It makes little sense to impose  
11 requirements on RENs that would soon change and will  
12 likely materially impact the need for changes to REN  
13 oversight measures.

14 The second reason is the reasoning that your  
15 Honor and Mr. Druyon just set forth, which is that  
16 fairness would dictate that these applications are based  
17 on the requirements that were in existence when they  
18 were filed.

19 To be clear, for these same reasons, SDREN  
20 would strongly oppose the consideration of application  
21 of IOU equity budget caps as applies to REN portfolios  
22 or any other limitations on equity spending as applied  
23 to RENs as part of issue 15 in this proceeding.

24 Like Ms. Pauker noted earlier, this is a  
25 broader policy issue that would make sense to address

1 alongside the other REN oversight policy considerations  
2 in the rulemaking.

3           Finally, on the topic of changes to  
4 cost-effectiveness policy that may be considered in the  
5 Energy Efficiency Rulemaking or in the Distributed  
6 Energy Resources Rulemaking, SDREN would again encourage  
7 the Commission to adopt its recommendation that  
8 following adoption of new cost-effectiveness policies  
9 across all of these venues, the Commission go ahead and  
10 host a workshop in the Energy Efficiency Rulemaking to  
11 reconcile all of the cost-effectiveness policy changes  
12 that have occurred. That way PAs can level set and  
13 determine what remaining needs, if any, are still  
14 present. Thank you.

15           THE REPORTER: Your Honor, it's the court  
16 reporter.

17           ALJ FITCH: Yes.

18           THE REPORTER: Friendly reminder to those who  
19 are reading off of documents to please slow down while  
20 reading. People tend to read much faster off documents  
21 than if they are just speaking. We want to be able to  
22 give you an excellent verbatim record. Thank you so  
23 much.

24           ALJ FITCH: You could also email it to the  
25 reporters if you are reading, which would help them out.

1           And actually, remind me where they would do  
2 that, what email address.

3           THE REPORTER: Reporting@cpuc.ca.gov would be  
4 just fine.

5           ALJ FITCH: We'll move on to Ms. Berlin on  
6 behalf of the Northern California Rural REN.

7           MS. BERLIN: Hi. Good afternoon. Susie Berlin  
8 for NREN. We likewise want to join in the chorus of  
9 expressing appreciation for presenting the proposed  
10 scope and the detail and information that was put in for  
11 what's in and what you're proposing to be in or out of  
12 scope. It's very helpful to considering these items.

13           We generally agree with the items that have  
14 been listed. We believe that it strikes a balance.  
15 Likewise, we believe that the cost-effectiveness issues  
16 and the administration issues are appropriately  
17 addressed in another rulemaking. We believe that it's  
18 very important, and we appreciate the recognition that  
19 we need to have a decision by this time next year so  
20 that we can timely implement the new programs and that  
21 the programs, the applications, should be judged and  
22 assessed based on the rules currently in place and not  
23 future policy considerations more broadly.

24           With that said, we agree with some of the  
25 issues that can be addressed within a year and can be

1 reflected. One of those would be item 19 on the  
2 treatment of nonregulated fuels. Thank you.

3 ALJ FITCH: Thank you. Our next speaker is  
4 Ms. Brandt on behalf of the Central California Rural  
5 REN.

6 MS. BRANDT: Thank you very much for the  
7 opportunity to speak today. I also appreciate the hard  
8 work that has gone into the proposed initial scoping  
9 list, as well as the balance that was sought here. We  
10 also do appreciate that a number of the issues proposed  
11 here are out of scope for this proceeding but likely to  
12 be in the rulemaking instead. I did want to agree with  
13 SCE -- (indecipherable).

14 THE REPORTER: Excuse me, Ms. Brandt. It's the  
15 court reporter. I'm struggling to hear and understand  
16 you. There is both an echo and your audio is coming in  
17 and out.

18 MS. BRANDT: I'm so sorry to hear that. So I  
19 was saying that we agree with SCE'S proposal that  
20 Net-to-Gross Ratio and the Preponderance of Evidence  
21 discussion should be either scoped here or in the  
22 rulemaking -- that we found that that was also not  
23 included in the list, but would be worth considering.

24 We agree with BayREN and 3C-REN that keeping  
25 the application focused for a decision in time to

1 implement the 2028 program is key.

2           And on the equity issues, we are very pleased  
3 to see and also would prioritize number 14, potential  
4 changes in a broader -- or a broad understanding of what  
5 that means to the definition of equity customers.

6           We also reiterate some of the concerns that  
7 were shared about number 15, and we agree with SDREN  
8 that we would also be concerned about caps on equity or  
9 limits on equity segment funding, but we do agree that  
10 who is eligible for equity should be in scope.

11           We would also, for consideration, put out that  
12 perhaps the focus should be on the threshold of review  
13 for equity customers. So I think that concludes our  
14 comments where we wanted to point out agreement or  
15 disagreement with what other parties have said.

16           I did also want to briefly address number seven  
17 in terms of portfolio consolidating program delivery  
18 types in new ways. We are concerned that eliminating  
19 the PUC's long-standing delivery type framework has  
20 caused disruption and creates a potential for  
21 operational upheaval, so that was the concern we wanted  
22 to raise, also number eight of programs with similar  
23 features being consolidated into a unified delivery  
24 structured.

25           We think if we're talking about a PA with

1 multiple programs that are similar, it could make sense,  
2 but if we're talking about combining delivery of  
3 programs from different PAs, they may have similar  
4 features but different target customer groups. That  
5 might not make as much sense, and it may not actually  
6 reduce administrative complexity. So I think that will  
7 conclude my remarks at this time. Thank you very much.

8 ALJ FITCH: Thank you. Next we'll move to  
9 Mr. Stano from Marin Clean Energy.

10 MR. STANO: Thank you, your Honor, Commissioner  
11 Douglas, and court reporters for the opportunity to  
12 comment. Wade Stano with Marine Clean Energy, MCE.

13 MCE strongly supports many issues in the  
14 proposed scope, especially those within equity  
15 integrated demand side management and building  
16 decarbonization categories numbered 15, 17 through 20,  
17 respectively.

18 MCE requests the Commission reconsider  
19 discussion of midcycle advice letters under portfolio  
20 mechanics and greater incorporation of nonenergy  
21 benefits in portfolios in support of increased energy  
22 affordability.

23 If not addressed in this proceeding, MCE  
24 further supports urgent prioritization like several  
25 parties stated of cost-effectiveness and issues around

1 the California Energy Efficiency Coordinating Committee,  
2 CAEECC, in the EE policy proceeding, R.25-04-010, to  
3 support determinations in this proceeding. Thank you so  
4 much.

5 ALJ FITCH: Thank you. Next, we'll move to  
6 Mr. Vijaykar from Peninsula Clean Energy.

7 MR. VIJAYKAR: Thanks very much, your Honor,  
8 and good afternoon. This is Nikhil Vijaykar on behalf  
9 of the Peninsula Clean Energy Authority.

10 PCE appreciates the ALJs' efforts to clearly  
11 lay out the scope of this proceeding, including many of  
12 the policy proposals that PCE and other parties have  
13 raised. We also appreciate your efforts in giving  
14 parties some clarity on the issues that are more  
15 appropriately considered in the OIR and in other  
16 proceedings. I'm going to spend most of my time on our  
17 primary concern with the draft scoping issues list,  
18 which is with its treatment of cost-effectiveness  
19 requirements.

20 The issue, "The application and implementation  
21 of cost-effectiveness requirements within the energy  
22 efficiency portfolio," that issue is listed under the  
23 issues that are out of scope for this proceeding but  
24 likely to be taken up in the rulemaking.

25 But the issue, and I quote, "Changes to the

1 applicability or primacy of different cost-effectiveness  
2 tests" is listed under "Issues proposed as entirely out  
3 of scope."

4           So at minimum, it's not clear to us how these  
5 issues are different. We would request more clarity  
6 from the Commission on those. More importantly, though,  
7 I think several parties here, including PCE, have made  
8 policy proposals related to the application or  
9 applicability or primacy of various cost-effectiveness  
10 tests in the EE context. That's the energy efficiency  
11 context.

12           Now, I agree -- we agree -- with the ALJs' view  
13 that we should not be making changes that apply  
14 retroactively to portfolios that are currently before  
15 the Commission and that any changes that are considered  
16 in this proceeding should apply on a going-forward  
17 basis.

18           But policy proposals related to  
19 cost-effectiveness tests, applicability, application,  
20 primacy, in our view, are properly addressed in this  
21 proceeding because those tests directly inform the  
22 construction of EE portfolios going forward. In the  
23 alternative, those issues are properly addressed in the  
24 rulemaking.

25           We respectfully disagree that the DER

1 proceeding where the ACC is litigated addresses those  
2 issues. That proceeding addresses the structure and the  
3 methodology of cost-effectiveness tests, but not the  
4 application of those tests to specific programs like  
5 energy efficiency or transportation, electrification,  
6 or SGIP. ]

7 So on the issue of cost-effectiveness test  
8 application and applicability, we request more clarity  
9 from the Commission, and we request that those issues  
10 either be scoped here in this proceeding where they are  
11 properly addressed or in the ruling.

12 Beyond those concerns, your Honors, with  
13 respect to issues in scope, we would ask for a little  
14 more clarity on issues seven and eight to better  
15 understand what the Commission is looking for from  
16 parties on those issues. And with respect to issues out  
17 of scope, we'd request more clarity on where the  
18 development of general nonenergy benefits should occur;  
19 for instance, if work on those issues should continue in  
20 the equity-related working group where it has currently  
21 proceeded.

22 The last thing I'll mention is that the scoping  
23 issues this mentions, the California Air Resources  
24 Board's anticipated rule changes, we believe those rule  
25 changes will have broad impact on building

1 decarbonization, and the implication of those rule  
2 changes will affect not only budget, but also EE  
3 portfolios more broadly, including relevant rules and  
4 regulations. So we would request that the scoping  
5 issues be modified to reflect that potentially broader  
6 set of implications.

7 I have other comments on schedule, but I will  
8 leave that to the appropriate time. Thank you for your  
9 time, your Honors.

10 ALJ FITCH: Thank you. Just specifically on  
11 your points about the cost-effectiveness and potential  
12 confusion we may have created, the way I thought about  
13 it -- and you can feel free to respond or others can --  
14 what we were thinking would be out of scope is sort of  
15 definition of tests that are applied broadly to not only  
16 energy efficiency, but also demand response or other  
17 distributed energy resources.

18 So, you know, how they're constructed is kind  
19 of not what we want to take on here, but for  
20 cost-effectiveness issues that are specific to energy  
21 efficiency or in some cases maybe only affect energy  
22 efficiency, then those would be more appropriate for the  
23 rulemaking.

24 So that's kind of how we were thinking of it  
25 broadly, but there may be nuances there that I'm not

1 articulating now that we can consider, but that was the  
2 basic idea.

3 MR. VIJAYKAR: Thank you, your Honor. That's a  
4 helpful clarification.

5 ALJ FITCH: Okay. I think we'll move to our  
6 next speaker, which is Ms. Melms from CalChoice.

7 MS. MELMS: Good afternoon, your Honors.  
8 Jessica Melms on behalf of CalChoice, which is a Joint  
9 Powers Authority providing regulatory support to eight  
10 CCAs in the SCE service area. The principal focus of  
11 our energy efficiency efforts are related to  
12 Elect-to-Administer alternatives; however, we are  
13 interested in general energy efficiency matters.

14 As such, CalChoice generally supports issues in  
15 the proposed scope as identified in the ALJs' proposal.  
16 Thank you.

17 ALJ FITCH: Thank you.

18 Next up is Mr. May on behalf Small Business  
19 Utility Advocates.

20 MR. MAY: Luke May with Small Business Utility  
21 Advocates, and thank you, your Honors.

22 SBUA generally supports the proposed draft  
23 scope for this proceeding and doesn't categorically  
24 object to any of the draft scope issues. And SBUA  
25 agrees that the primary focus should remain on

1 evaluating the business plan under existing policies and  
2 requirements; however, as was recently noted, SBUA  
3 requests some further clarification in the scoping memo  
4 itself specifically relating to the some of these  
5 broader policy questions and cost-effectiveness  
6 methodologies that were initially identified as being  
7 out of scope.

8           For the remaining issues, SBUA is particularly  
9 interested in those affecting small business customer  
10 participation and access. We believe that the record  
11 should examine whether proposed budgets, forecasts, and  
12 program designs will deliver meaningful benefits to  
13 small commercial customers who often face unique  
14 barriers relating to participation, including limited  
15 capital, limited staff resources, and other operational  
16 constraints.

17           SBUA is also particularly interested in those  
18 draft proposed scoping issues relating to equity, market  
19 support, and financing issues, which I believe are  
20 roughly issues 14 through 16.

21           And SBUA also maintains a strong interest in  
22 third-party procurement improvement, the draft issue  
23 number 13. Access to affordable financing remains an  
24 effective tool for increasing small business  
25 participation, and SBUA encourages that through this

1 proceeding. We examine whether existing financing  
2 structures remain appropriate for the maximization of  
3 small business customer participation. Thank you.

4 ALJ FITCH: Thank you.

5 Next, we'll have Mr. Carmichael on behalf of  
6 the Joint Labor Parties. I'm not going to list them  
7 all.

8 MR. CARMICHAEL: Thank you, your Honor. I will  
9 for the record. Kevin Carmichael on behalf California  
10 State Association of Electrical Workers; Western States  
11 Council of Sheet Metal, Air, Rail, and Transportation  
12 Workers; California State Labor Management Cooperation  
13 Committee for the International Brotherhood of  
14 Electrical Workers and the National Electrical  
15 Contractor Association; Joint Committee on Energy and  
16 Environmental Policy, and California State Trades  
17 Council.

18 These parties object to the finding that  
19 workforce standards and high road job creation are out  
20 of scope of this proceeding. This finding upends and is  
21 a complete 180 on over a decade of Commission directives  
22 requiring energy efficiency business plans to address  
23 the issue of, quote, "ensuring and continuously  
24 improving workforce and installation quality for energy  
25 efficiency measures," end quote.

1           It also violates the commitments the Commission  
2 has made in MOUs and ESJ Action Plan to ensure that the  
3 EE incentive programs support the creation of high road  
4 jobs. Finally, it ignores that many of the business  
5 plans purport to address installer standards and  
6 high road jobs creation, and if the parties are not  
7 provided the opportunity to rebut those claims, they  
8 will be adopted in the business plans as is.

9           Now, there's a 20-year history of the PAs  
10 avoiding voluntary adoption of any meaningful steps to  
11 address installer standards and installation quality,  
12 and their disclaimer of any responsibility for ensuring  
13 actual compliance with installer-training requirements  
14 demonstrates that specific goals, requirements, and  
15 strategies continue to need to be addressed in the  
16 business plans, including clearly to find  
17 responsibilities for ensuring implementation and  
18 compliance.

19           In taking the step of reversing previously  
20 settled guidance and finding that workforce standards  
21 are out of scope of the business plans, the proposed  
22 scoping issues list states that these issues should  
23 instead be addressed under Rulemaking 25-04-010, which  
24 is the procedural home of business plan applications,  
25 but the joint parties don't believe that this holds up

1 to scrutiny.

2           First, that rulemaking does not currently  
3 include workforce standards within scope; second,  
4 there's no guarantee that if that rulemaking does  
5 address workforce standards, that it will impose any  
6 requirements retroactively to incentive programs  
7 approved under these business plan applications, and  
8 until such time as new guidance is adopted, the business  
9 plans need to demonstrate that they are in compliance  
10 with prior guidance on this issue.

11           And, third, that rulemaking involves all sorts  
12 of issues that are in scope for the business plans.  
13 It's not a substitute for addressing these issues in the  
14 business plans themselves.

15           And, finally, the reason these issues have been  
16 addressed and continue to need to be addressed in the  
17 business plans is because experience has demonstrated  
18 that clear goals, guidance, metrics, and  
19 responsibilities must be in place prior to incentive  
20 program design because the design of the program is  
21 critical to its ability to meet and enforce the  
22 Commission's installer training and high road job  
23 creation goals.

24           In summary, workforce standards have not only  
25 historically been part of the business plan scope, they

1 are addressed in the current business plans in a manner  
2 that demands an opportunity for stakeholder oversight  
3 and input. So we strongly urge you to reverse your  
4 position and put installer standards and high road job  
5 creation into the scope of these proceedings. Thank  
6 you.

7 ALJ FITCH: Thanks. Just a brief response to  
8 that, I think what we were attempting to say would be  
9 appropriate for the rulemaking is any new standards.

10 We did not mean to say that compliance with  
11 existing rules -- which I know there are some because I  
12 personally authored one of the decisions that has the  
13 workforce standards as they currently exist. We were  
14 not intending to say that that was out scope. I think  
15 that would be covered under sort of the general  
16 compliance with the rules that already exist. So I  
17 think that would be fair game.

18 It was more intended to -- the scope issue that  
19 was proposed to be punted to the rulemaking was more  
20 focused on any new standards that might be applied. So  
21 I don't know if that helps, but that's a clarification.

22 MR. CARMICHAEL: Understood. Thank you for  
23 that clarification, your Honor.

24 ALJ FITCH: Thanks.

25 We'll move to Ms. Hatton on behalf of Rising

1 Sun Center for Opportunity.

2 MS. HATTON: Hello. Thank you, your Honor.  
3 This is Julia with Rising Sun Center for Opportunity.  
4 In general, Rising Sun supports the schedule and scope  
5 proposed by the Commission. Regarding the schedule, we  
6 urge the Commission, like others, and as you've said  
7 yourself, to deliver a proposed decision as quickly as  
8 possible, and we're hopeful that the proceeding can be  
9 resolved within approximately 12 months or less.

10 We support the decision to classify as entirely  
11 out of scope the proposed moratorium on new RENS',  
12 changes in applicability of cost-effective requirements  
13 of different portfolio segments, and elimination of  
14 individual programs solely on the basis of  
15 cost-effectiveness.

16 While nonenergy benefits were also determined  
17 to be out of scope, we just wanted to emphasize the  
18 importance of properly valuing nonenergy benefits,  
19 particularly for equity segment programs, and we  
20 encourage coordination with parallel efforts at both the  
21 CPUC and CEC.

22 If workforce quality standards and high road  
23 job creation in the context of energy efficiency end up  
24 being prioritized within the rulemaking proceeding,  
25 there's still significant opportunity within the

1 proposed business plans to strengthen labor standards  
2 and workforce development during procurement and  
3 implementation in line with rulings and decisions  
4 already made and on the topic.

5           And we really support continuing to invest in  
6 workforce education and training programs, strengthening  
7 partnerships with labor, and incorporating  
8 recommendations from the CAKE equity advisory committee  
9 memo on this topic as well as others into the scoping  
10 process.

11           Regarding several specific proposed issues in  
12 scope and Rising Sun's priorities, number six, it would  
13 be a departure from precedent and a significant  
14 investment of time for the Commission to review and  
15 approve programs at the individual, rather than the  
16 portfolio level, and so we don't believe that this is  
17 consistent with the business plan's regulatory framework  
18 or necessary at this time.

19           For number 14, we support the inclusion of  
20 potential changes to the definition of "equity  
21 customers" to better and effectively serve low income  
22 customers. The exclusion of low income customers from  
23 the equity definition or HTR definition should not be in  
24 scope.

25           And for number 15, we can't overstate how

1 crucial it is for the Commission and the portfolio  
2 administrators to preserve and invest in equity programs  
3 to help address energy affordability for California's  
4 most vulnerable residents and businesses.

5 Rising Sun's engaged in the EE space and with  
6 the portfolio administrators since 2006, and RENs have  
7 demonstrated their unique ability to deliver savings and  
8 impact for those customers. Rather than divest from  
9 equity programs, we really have an opportunity and an  
10 imperative to do a better job of putting the people most  
11 impacted by energy issues at the center, making them a  
12 true focus and priority of those programs that they help  
13 to pay for.

14 So a reduction in equity should not be in  
15 scope, and Rising Sun would be strongly opposed to any  
16 such reductions. Thank you so much.

17 ALJ FITCH: Thank you.

18 Our next speaker is Ms. Flores from the Natural  
19 Resources Defense Council.

20 MS. FLORES: Good afternoon, Commissioner  
21 Douglas and your Honors. My name is Ericka Flores. My  
22 pronouns are she, they, ella, and I'm the lead advocate  
23 for equity, energy efficiency and affordability  
24 representing NRDC today, the Natural Resources Defense  
25 Council. I currently lead also NRDC's engagement in

1 energy efficiency and decarbonization proceedings, and I  
2 appreciate the opportunity to participate in today's  
3 prehearing conference and to comment before the  
4 Commission.

5 Now, while NRDC understands that the overall  
6 EE, energy efficiency, framework is out of scope, we  
7 want to recommend that the issues dealt within this  
8 scope of this proceeding be designed to enable a  
9 wholistic review of the State's EE policy framework to  
10 ensure that the policies and programs continue to align  
11 with and advance the State's affordability, reliability,  
12 equity, and decarbonization goals.

13 NRDC broadly supports the proposed scope of  
14 this proceeding with very few exceptions. First, while  
15 we understand the intent behind its excluding  
16 cost-effectiveness from this proceeding, NRDC urges the  
17 Commission to reconsider and include at minimum a  
18 limited scope of cost-effectiveness reform in scope of  
19 this proceeding. Multiple program administrators identify  
20 challenges with the current framework, including  
21 continued reliance on the TRC, the Total Resource Cost  
22 test, and treatment of participant cost.

23 Since cost-effectiveness directly influences  
24 portfolio design, program budgets, customer offerings,  
25 we believe it's appropriate to include it in this

1 proceeding.

2 I understand the scope of energy efficiency  
3 policy proceeding, Rulemaking 25-04-010, includes  
4 reference to cost-effectiveness, that that scope is  
5 limited to, one, energy efficiency cost or, two, the  
6 applicability of cost-effectiveness requirements to  
7 different administrators or segments of the energy  
8 efficiency portfolio; however, it also states that the  
9 design of the individual cost-effectiveness test for  
10 their inputs should be handled in the distributed energy  
11 resource cost-effectiveness proceeding R.22-11-013.

12 While we fully understand the intent behind  
13 this, we also note that the choice of which test and  
14 inputs to use has a direct impact on approving the most  
15 effective portfolio programs to meet the Commission's  
16 and the State's clean energy goals.

17 The timing to address such issues in other  
18 proceedings may not line up in sufficient time to inform  
19 the approval of these portfolios. If, however, the  
20 intent is to resolve these issues in other proceedings,  
21 but apply to this application, we would be very  
22 interested in exploring that approach as well.

23 In particular, we want to urge the Commission  
24 to scope in which test and inputs are appropriate so  
25 that we can be sure to use the test that most directly

1 answers the question at hand; for example, one objective  
2 is to make sure the investments and portfolios provide  
3 more value than investment in alternative power uses  
4 such as solar or fossil. In this case, the appropriate  
5 test to measure for resource acquisition programs is the  
6 PAC, Program Administrator Cost test.

7           The customer payment for participating in a  
8 program is irrelevant when comparing the value of a PA's  
9 investment in EE versus their investment in an  
10 electricity resource, making the TRC test more  
11 constricting than necessary.

12           For example, if a customer finds value in the  
13 upgrade being offered by an EE or an electrification  
14 program, and they are willing to put in their own money  
15 to get that rebate for the upgrade -- or that upgrade,  
16 that has bearing on the question whether the PA's  
17 investment in such program is equal to or cheaper than  
18 investment in other power options, including those  
19 costs, and, therefore, the breadth of program that can  
20 be offered.

21           I'm almost done. I promise.

22           Given the complexity of the portfolios and the  
23 fact that such questions may not be resolved in the  
24 current proceedings in time to employ the review of  
25 useful folios, we reiterate our request to include

1 cost-effectiveness within scope so that we can have  
2 these conversations and ensure the most appropriate test  
3 is being used to assess and improve the current  
4 application.

5           Secondly, NRDC supports including the  
6 reconsideration of the third-party implementation  
7 framework in scope. Several PAs identified concerns  
8 regarding administrative complexity in procurement  
9 requirements. We want to propose that the Commission  
10 should evaluate whether the current framework is  
11 achieving its intended objectives of innovation,  
12 continuity, and market development and explore  
13 improvements as needed.

14           Third, NRDC supports having electrification and  
15 fuel-switching issues in scope as described.

16           Fourth, NRDC requests inclusion of equity  
17 definitions of a threshold, and treatment of HTR, Hard  
18 to Reach, customers, in scope. We believe that these  
19 issues directly affect portfolio design and customer  
20 outcomes, making it relevant to this proceeding as the  
21 portfolios are being reviewed and approved.

22           Similarly to the above, these issues could be  
23 focused on the most critical issues relevant to  
24 appointing the most effective portfolios.

25           And, finally, NRDC supports consideration of

1 workforce development issues in this proceeding.  
2 Workforce capacity and proper training would be critical  
3 to successful program delivery and long-term market  
4 transformation.

5 So those are my comments for today. Thank you,  
6 again, for the time and for letting me speak. ]

7 ALJ FITCH: Thank you. Next up is Mr. Gibbs on  
8 behalf of Cal Advocates.

9 MR. GIBBS: Thank you, your Honor. David Gibbs  
10 for Cal Advocates. Cal Advocates looks forward to  
11 participating in this proceeding and appreciates the  
12 opportunity to provide input at today's PHC.

13 Cal Advocates would like to address two items  
14 relating to issues identified as "out of scope" in the  
15 proceeding.

16 First, under the category of "Issues out of  
17 scope, but likely to be taken up in the rulemaking  
18 R.25-034-010 in the near future," Cal Advocates believes  
19 that the two issues; one, "Application and  
20 implementation of cost-effectiveness requirements in the  
21 energy efficiency portfolio"; and, two, "Regional energy  
22 network policies and oversight tools," that those should  
23 be included in scope for this proceeding.

24 Cal Advocates notes that cost-effectiveness as  
25 it applies to RENs was included as a scoping issue. In

1 the previous rolling portfolio application proceeding,  
2 Application 22-02-005, I believe that was scoping issue  
3 number four.

4 Further, Cal Advocates is concerned that these  
5 issues are not currently scheduled in the Energy  
6 Efficiency Order Instituting Rulemaking proceeding,  
7 R.25-04-010, and that they will not be litigated before  
8 a decision on the portfolio applications in this  
9 proceeding. Cal Advocates believes it would be more  
10 appropriate to include these issues in this proceeding  
11 where the outcomes can be applied to the portfolio cycle  
12 under consideration.

13 Regarding taking up these issues in R.25-04-010  
14 and applying updates in the next portfolio cycle,  
15 deliberating these issues in R.25-04-010 and applying  
16 the updated cost-effectiveness requirements to the next  
17 portfolio cycle will delay improvements to  
18 cost-effectiveness requirements for another four years,  
19 which is unreasonable given the current rate  
20 affordability crisis.

21 Moving on to our next category of issues,  
22 issues proposed as out of scope entirely, the issue  
23 elimination of individual programs solely on the basis  
24 of cost-effectiveness in isolation from consideration of  
25 their role and overall portfolio should be included

1 within scope in this proceeding.

2 The governor's 2024 Executive Order N-5-24  
3 identifies affordable electric service as essential for  
4 California's clean energy transition. The executive  
5 order also directs the Commission to take action to  
6 address the rate affordability crisis.

7 Additionally, in 2025 the California State  
8 Auditor released Report 2023-127, which reviewed the  
9 Commission's energy efficiency programs and found  
10 several concerns with the cost-effectiveness of those  
11 energy efficiency programs and made numerous  
12 recommendations to address those concerns.

13 The auditor's report recommends that the  
14 Commission, quote, "Could better protect ratepayers by  
15 increasing its monitoring of utilities' energy  
16 efficiency programs proactively identifying  
17 underperforming efficiency programs and eliminating  
18 those that do not save sufficient energy or do not prove  
19 to be cost-effective.

20 The Commission's response to that auditor's  
21 report agrees with the recommendations made in the  
22 report and states that the Commission can only end  
23 non-cost-effective individual programs in a formal  
24 proceeding.

25 This proceeding is the formal proceeding for

1 the Commission to address the concerns raised in both  
2 the executive order and the State Auditor's report,  
3 including developing a process by which  
4 non-cost-effective programs can be eliminated.  
5 Developing such a process here will lower costs for all  
6 ratepayers and improve program performance.

7 Thank you. That concludes Cal Advocates'  
8 comments.

9 ALJ FITCH: Thank you. Next up, second-to-last  
10 speaker here is Ms. Lazenby on behalf of The Utility  
11 Reform Network.

12 MS. LAZENBY: Thank you, your Honors. Ruthie  
13 Lazenby on behalf of The Utility Reform Network.

14 TURN generally supports the proposed issues  
15 list. I just have one quick comment also regarding the  
16 cost-effectiveness requirements and REN's policy and  
17 oversight issues that Cal Advocates just mentioned.

18 As was mentioned, the draft list currently  
19 designates those issues as likely to be taken up in a  
20 rulemaking in the near future. While TURN does not  
21 necessarily object to the proposal to include these in  
22 the rulemaking, we do want to stress that it's important  
23 they actually are addressed there.

24 They're scoped in the rulemaking, but they're  
25 not, to my understanding, currently identified on the

1 schedule, and we are all confronting the passage of time  
2 every day. I know there's limited time on the  
3 proceeding as well.

4 So TURN's primary message is just that it's  
5 important that those issues are addressed in some venue  
6 so that they can be resolved well in advance of the next  
7 round of applications. Thank you.

8 ALJ FITCH: Thank you. And I just want to  
9 acknowledge we realize we are probably going to have to  
10 adjust the schedule of the rulemaking to accommodate  
11 some of these issues that were raised in the  
12 applications that we don't think we can address here, so  
13 we would do that. It's the same people, all of us.  
14 Thanks.

15 And last but not least, we have Ms. Miller on  
16 behalf of Greenlining.

17 MS. MILLER: Good afternoon, Commissioner  
18 Douglas, ALJ Fitch, ALJ Kao, and court reporters.  
19 Carmelita Miller. I represent Greenlining.

20 Greenlining generally supports the proposed  
21 scope and appreciates inclusion of issues 14 and 15  
22 related to equity customers. We strongly support  
23 examining potential changes to the definition of equity  
24 customers and considering whether eligibility and  
25 funding thresholds should be adjusted to better serve

1 those customers.

2           These questions are fundamental to ensuring  
3 that energy efficiency investments reach the households  
4 and communities facing the greatest energy burden,  
5 affordability challenges, and barriers to participation.

6           Like Rising Sun, we also believe that the  
7 exclusion of low-income customers from the equity  
8 definition or Hard-to-Reach definitions should not be in  
9 scope.

10           Lastly, separately, Greenlining understands  
11 that the decision regarding the development of  
12 non-energy benefits and their inclusion in  
13 cost-effectiveness calculations are more appropriately  
14 addressed in other proceedings and therefore may be  
15 outside the scope of this proceeding.

16           However, we want to emphasize that this  
17 proceeding remains critically important to the  
18 Commission's future consideration of non-energy  
19 benefits. Many of the issues proposed to be examined  
20 here, including equity customers' definitions,  
21 eligibility thresholds, portfolio design, building  
22 decarbonization activities, and funding approaches will  
23 generate valuable evidence regarding the real-world  
24 impacts of energy efficiency programs on low-income  
25 households and disadvantaged communities.

1           That record can and should inform future  
2 Commission discussions regarding the value of non-energy  
3 benefits and whether current cost-effectiveness  
4 frameworks fully capture the benefits these programs  
5 provide. Thank you.

6           ALJ FITCH: Thank you.

7           And thank you all for your comments. I'm going  
8 to go off the record for a second.

9           (Off the record.)

10          ALJ FITCH: Back on the record.

11          Thanks, everyone. With that, I'm going to turn  
12 it back over to Judge Kao. She is going to have parties  
13 talk about schedule recommendations, need for hearings,  
14 categorization, and all of that stuff.

15          So, Judge Kao.

16          ALJ KAO: Thanks. Can everyone hear me? Just  
17 double-checking. Okay.

18          Thanks, Judge Fitch, and thank you, everyone,  
19 for your comments on the scope. We'll do another round  
20 of comments on the schedule and remaining issues.

21          The draft schedule distributed this week  
22 included a plan to have a decision adopted by the  
23 Commission by the middle of 2027 or so. This next round  
24 of comments we'd like you to focus on schedule to the  
25 extent that parties did not address that in their

1 comments about the scope.

2 We're particularly interested in how you would  
3 suggest we handle the inputs from a decision on natural  
4 gas incentive policy, as well as the SDG&E application  
5 to withdraw from regional energy efficiency programs in  
6 relation to the preliminary schedule. And then to the  
7 extent you wish to address the proceedings  
8 categorization or need for hearing, we'll hear from you  
9 on that now as well.

10 If you have particular issues you believe may  
11 require evidentiary hearings, we would appreciate your  
12 pointing them out now to the extent you have already  
13 identified the issues that need hearings or may need  
14 hearings.

15 Finally, if there is anything you would like to  
16 say in response to statements from other parties on the  
17 scope issues, feel free to add any final scope comments  
18 during this round. And, again, each party should try to  
19 stay within two or three minutes for their comments.

20 With that, I'll start again with PG&E.

21 MR. SEZGEN: Thank you, your Honor. Eric  
22 Sezgen for PG&E. The schedule sent out with the  
23 proposed scope -- PG&E supports the schedule, both  
24 eventualities, one with hearing; one without hearing. I  
25 think in terms of evidentiary hearings, PG&E at this

1 point doesn't see the need for them, but I believe on  
2 some of these workforce issues, a workshop could be  
3 productive or PG&E is open to providing potentially more  
4 information depending on what round of testimony that  
5 might make sense for. Other than that, that concludes  
6 my comments.

7 Thank you very much.

8 ALJ KAO: Thank you, Mr. Sezgen.

9 Next, we'll have SCE.

10 MS. KILBERG: Thank you, your Honor. SCE also  
11 supports the schedule as outlined in the draft scoping  
12 issues. We don't anticipate at this point that there  
13 would be a need for evidentiary hearings. As stated in  
14 our prehearing conference statement, we feel that a  
15 sufficient record can be developed through just written  
16 submissions, as well as potential workshops, to resolve  
17 all the issues in scope.

18 Beyond that, I don't think we have any further  
19 comment on either the schedule or the need for hearings.  
20 Thank you.

21 ALJ KAO: Thank you, Ms. Kilberg.

22 Next is SDG&E.

23 MS. HANSSON: Thank you, your Honors. Rebecca  
24 Hansson on behalf of SDG&E. SDG&E similarly does not  
25 believe there will be a need for hearings in this

1 proceeding, and SDG&E has no comments on the schedule at  
2 this time or any of the other issues that you listed.

3 Thank you, your Honors.

4 ALJ KAO: Thank you, Ms. Hansson.

5 Next is SoCalGas.

6 MR. FOHRER: Thank you, your Honor. On the  
7 schedule, we're generally supportive of the draft  
8 schedule that was circulated with one exception that I  
9 would call out, which is right now the prepared  
10 intervenor testimony -- or "prepared direct testimony"  
11 as it's called -- is tentatively set for October 16th  
12 with rebuttal testimony being served November 6th, which  
13 is approximately three weeks, which is a very short time  
14 period.

15 I would note in the last EE cycle it was a  
16 month's time between when intervenor testimony was  
17 served and when rebuttal testimony was served. So I  
18 would suggest either moving that intervenor testimony up  
19 one week or moving the rebuttal testimony back one week  
20 because a month, to me, is about as short as you really  
21 want to be getting for these sort of complicated issues  
22 that are circulating for rebuttal. That's all I have on  
23 the schedule component.

24 And then as we noted in our application, we  
25 don't believe hearings are necessary. I think this is

1 consistent with the way that these issues were handled  
2 in the previous portfolio application cycle. Thank you.

3 ALJ KAO: Thank you, Mr. Fohrer.

4 Next is BayREN and 3C-REN.

5 MS. PAUKER: Thank you, your Honor. This is  
6 Sheridan Pauker on behalf of BayREN and 3C-REN.

7 May I ask a quick clarifying question? Are you  
8 saying that responses to other parties' comments earlier  
9 in this hearing should be addressed right now or is that  
10 in a third round?

11 ALJ KAO: I was saying any responses to other  
12 parties' comments on the scope should be addressed now.  
13 This will be the second and final round of comments.

14 MS. PAUKER: Great. That was my understanding  
15 too. So BayREN and 3C-REN support the ALJs' proposed  
16 schedule and do not believe hearings will be necessary  
17 in this proceeding.

18 In response to other parties on scoping issues,  
19 BayREN and 3C-REN just wish to reiterate their  
20 appreciation and support for the draft scoping  
21 structure.

22 In response to Cal Advocates', SoCal Edison's,  
23 and NRDC's comments, the judges' acknowledgment that it  
24 would be unreasonable to restructure the  
25 cost-effectiveness framework retroactively after PAs

1 have spent one to two years preparing their  
2 applications, we agree with that position in that any  
3 such changes would likely require the filing of  
4 significantly revised applications and that this would  
5 not allow for launch by Jan 1, 2028.

6 In response to Cal Advocates' points regarding  
7 affordability and cost-effectiveness in the executive  
8 order, we wish to note that the rulemaking proceeding  
9 expressly scoped in affordability and cost-effectiveness  
10 for the very purpose of complying with the executive  
11 order and continue to believe that such issues are  
12 better addressed in a policy docket, and holistically,  
13 in light of the REN limitations on REN programming, that  
14 those things really need to be addressed in tandem.

15 We appreciate Judge Fitch's clarification that  
16 the application of alternative cost-effectiveness tests,  
17 such as the portfolio administrator cost test or  
18 non-energy benefits to EE programs, could occur within  
19 the rulemaking proceeding, but that the formulas for  
20 such tests, for example, are if they're being developed  
21 in other dockets, that that would continue there. So we  
22 appreciate that clarification.

23 We appreciate the clarification that issue 14  
24 on equity would also include changes to the definition  
25 of "Hard to Reach" and just would ask that that be

1 clarified in the scoping memo as well so that the  
2 parties know that that will be addressed.

3           On issue number 15, we just wish to say that  
4 the way in which CCR REN, Ms. Brandt, articulated that  
5 issue is aligned with BayREN and 3C-REN, that we  
6 appreciate the inclusion of eligibility for equity, but  
7 if the issue of aligning customer targeting requirements  
8 for RENs is meant to deal with composition or  
9 percentages or limitations on those percentages of a  
10 budget that may be focused on equity, that we would ask  
11 that be addressed in the rulemaking docket alongside  
12 these broader issues.

13           That concludes my remarks. Thank you very  
14 much.

15           ALJ KAO: Thank you, Ms. Pauker.

16           Next is SoCalREN. ]

17           MS. MEDINA: Yes. Lujwana Medina for SoCalREN.  
18 SoCalREN supports the proposed proceeding schedule, and  
19 also agrees with other parties that we do not need  
20 evidentiary hearings at this time. Thank you.

21           ALJ KAO: Okay. Thank you, Ms. Medina.

22           Next we have I-REN.

23           MR. DRUYON: Thank you. And I-REN also  
24 supports the proposed schedule and wants to emphasize  
25 that it is crucial for I-REN and other PAs to have

1 sufficient time in 2027 to prepare for launching new  
2 portfolios. And then we also agree that evidentiary  
3 hearings will not be necessary. Thank you.

4 ALJ KAO: Thank you, Mr. Druyon.

5 Next is San Diego REN.

6 MS. GREENWALD: Thank you, your Honor. This is  
7 Alissa Greenwald on behalf SD REN. SD REN also supports  
8 the proposed procedural schedule, as drafted, and shares  
9 in other RENs' concerns about any proposed scheduling  
10 that would cause significant delay.

11 And then, finally, just really briefly, I want  
12 to respond to Cal Advocates' argument that including  
13 changes to REN policy and oversight in this proceeding  
14 would be consistent with prior proceedings.

15 In response to that, I would just point the  
16 Commission back to its decision in D.19-12-021 where the  
17 Commission considered this exact issue, and found that  
18 it was a broader question of energy efficiency policy  
19 and more appropriate for a rulemaking setting. Thank  
20 you.

21 ALJ KAO: Thank you, Ms. Greenwald.

22 Next is NREN.

23 MS. BERLIN: Yes, Susie Berlin for NREN. We  
24 support the schedule as proposed. We think it provides  
25 us with a clear path to have this item resolved in time

1 for us to implement our plans. Thank you.

2 ALJ KAO: Thank you, Ms. Berlin.

3 Next is CCR REN.

4 MS. BRANDT: Melissa Brandt for CCR REN.

5 CCR REN does support the proposed schedule, and we agree  
6 with many other parties that we don't see the need at  
7 this time for evidentiary hearings.

8 (Audio failure.)

9 (Reporter clarification.)

10 ALJ KAO: Off the record.

11 (Off the record.)

12 ALJ KAO: We'll be back on the record, and if  
13 you could repeat your comments.

14 MS. BRANDT: CCR REN does support the proposed  
15 schedule, and we agree with many other parties that we  
16 don't see the need at this time for evidentiary  
17 hearings. We appreciate the fact that the proposed  
18 schedule is designed to have a proposed decision early  
19 enough in 2027, which will allow us to implement at the  
20 beginning of 2028. Thank you very much.

21 ALJ KAO: Thank you again.

22 Our next party is MCE.

23 MR. STANO: Wade Stano for MCE. MCE supports  
24 the draft schedule and categorization of this  
25 proceeding. MCE finds, like several parties stated,

1 because of the robust record already in this proceeding  
2 and the multiple proposed procedural opportunities for  
3 evaluation of the applications, that evidentiary  
4 hearings are not necessary at this time.

5 MCE generally supports workshops, public  
6 participation hearings, and providing other accessible  
7 pathways for parties and members of the public to  
8 further comment on the applications. Thank you, your  
9 Honor.

10 ALJ KAO: Thank you, Mr. Stano.

11 Next is Peninsula Clean Energy.

12 MR. VIJAYKAR: Thank you, your Honor. Nikhil  
13 Vijaykar on behalf Peninsula Clean Energy. We have no  
14 comments with respect to the need for evidentiary  
15 hearings or with respect to the categorization of the  
16 proceeding.

17 With respect to the procedural schedule, we are  
18 generally comfortable with what the ALJs have proposed  
19 with respect to the first half of the proceeding.

20 We have some concerns on the back half of the  
21 proceeding, and one I would echo -- I think it was  
22 counsel for SoCalGas said with respect to the gap in  
23 time, following the submission of intervenor direct  
24 testimony, the turnaround from intervenor direct  
25 testimony to party rebuttal testimony to us seemed

1 exceedingly narrow, particularly given the breadth of  
2 intervenor testimony that we expect from the parties in  
3 this proceeding.

4           So we would request more time between the  
5 filing of intervenor direct testimony and the filing of  
6 party rebuttal testimony.

7           Just for the purposes of putting something in  
8 front of the ALJs for their consideration, we have put  
9 together a counterproposal on the scheduling that I  
10 emailed to the court reporters earlier today just so  
11 that they have that in front of them.

12           I'll read it into the record just for  
13 everybody's convenience, and so here goes:

14           So we have no changes -- propose no changes  
15 to the ALJs' proposed schedule through the  
16 filing of direct testimony.

17           We propose a date of January 8 for rebuttal  
18 testimony;

19           January 13 for our meet and confer;

20           January 18, 2027 for a deadline to file a  
21 motion to request evidentiary hearings;

22           January 25 for an ALJ ruling to determine  
23 the status of evidentiary hearings;

24           February 22 for opening briefs;

25           March 15 for reply briefs.

1           And we think that procedural schedule should  
2 allow for a proposed decision in April 2027 and for a  
3 decision on the Commission agenda by May 2027,  
4 consistent with the ALJs' proposed procedural schedule,  
5 which we understand is important to allow for portfolios  
6 to go into effect in 2027 on a timely basis.

7           The only other comment, and, really, it's more  
8 of a question that I have on the schedule, and it is to  
9 clarify the direct testimony deadline applies only to  
10 non-PA intervenors, and that PA applicants are expected  
11 to file rebuttal testimony that addresses other PA  
12 applications on the rebuttal testimony deadline, and not  
13 on the intervenor direct testimony deadline.

14           So that's just a point of clarification for  
15 your Honors. We have no other comments on the  
16 procedural schedule at this time. Thank you.

17           ALJ KAO: On your question of clarification,  
18 that is also my understanding, but I'm going to look to  
19 Judge Fitch to see if that's accurate.

20           ALJ FITCH: I'll just say we created this  
21 confusion last time by calling it "intervenor  
22 testimony," and then someone asked us, "Well, as an  
23 applicant, can we file testimony?" And we said, "Yes."

24           So we continue to be confused about this. I  
25 don't have a strong preference, although I do think it

1 might be worth the ability for everyone to respond to  
2 each other. So, in other words, have the applicants, to  
3 the extent they want to file opening testimony, able to  
4 do so, and then allow other folks to respond in  
5 rebuttal.

6 For a more robust record, I think that would be  
7 my preference, but we will talk about that, and we will  
8 make sure we make it clear, when we issue the scoping  
9 memo, which way it's going to go.

10 How's that?

11 MR. VIJAYKAR: Thank you, your Honors. For  
12 what it's worth from PCE's standpoint, I believe the way  
13 it was handled -- even if there was some confusion, I  
14 believe the way it was handled in the last round of that  
15 application was to have PAs file what other  
16 jurisdictions might call "cross-answering testimony" at  
17 the rebuttal testimony deadline.

18 And I think that's the way we would prefer it  
19 be handled this time, but I think more than anything,  
20 we're looking for clarity.

21 ALJ FITCH: Understood. Thank you.

22 MR. VIJAYKAR: Thank you.

23 ALJ KAO: Thank you, Mr. Vijaykar.

24 Next is CalChoice.

25 MS. MELMS: Thank you, your Honor. Jessica

1 Melms for CalChoice. We support the schedule as drafted  
2 and do not have an opinion on the need for evidentiary  
3 hearings or the categorization of the proceeding. Thank  
4 you.

5 ALJ KAO: Thank you, Ms. Melms.

6 MS. MELMS: Thank you.

7 ALJ KAO: Next is SBUA.

8 MR. MAY: This is Luke May with SBUA, and SBUA  
9 does not have any objections to the proposed schedule  
10 nor does it have any objection to the proceeding  
11 categorization at this point. SBUA does not anticipate  
12 that it would request evidentiary hearings.

13 And, lastly, to the extent that I can comment  
14 on previous statements raised, I would like to reaffirm  
15 and support those other parties who indicated that while  
16 we would not expect any form of findings of fact or  
17 conclusions of law relating to cost-effectiveness test  
18 and non-energy benefits, SBUA does request, particularly  
19 for equity and market support program that measure  
20 applications, that non-energy benefits be given the  
21 greatest amount of consideration possible in this  
22 proceeding. Thank you.

23 ALJ KAO: Okay. Thank you, Mr. May.

24 Next is the Joint Labor Parties.

25 MR. CARMICHAEL: Thank you, your Honor. Kevin

1 Carmichael here on behalf of the Joint Labor Parties.  
2 The Joint Parties have no issue with the schedule as  
3 proposed.

4 And with regard to evidentiary hearings, we are  
5 generally in agreement that I think that there will be  
6 ample opportunities to gather additional information  
7 through written testimony, rebuttal testimony, briefs,  
8 maybe workshops.

9 So right now we don't anticipate the need for  
10 evidentiary hearings; however, should there be a  
11 disputed issue of material fact at some point, we  
12 reserve the right to request such hearings. Thank you.

13 ALJ KAO: Thank you, Mr. Carmichael.

14 Next is Rising Sun Center for Opportunity.

15 MS. HATTON: Hi. Julia with Rising Sun, your  
16 Honors. Fine with the schedule and do not see a need  
17 for evidentiary hearing at this time. Thank you.

18 ALJ KAO: Thank you, Ms. Hatton.

19 Next is Natural Resources Defense Council.

20 MS. FLORES: Ericka Flores with NRDC.

21 Currently NRDC supports the proposed schedule and  
22 categorization, and we currently do not have a position  
23 on whether evidentiary hearings will be needed for this  
24 proceeding. Thank you, your Honor.

25 ALJ KAO: Thank you, Ms. Flores.

1           Next is Cal Advocates.

2           MR. GIBBS: Thank you, your Honor. David Gibbs  
3 for Cal Advocates. Cal Advocates agrees with the  
4 categorization of the proceeding as ratemaking.

5           Cal Advocates believes it's premature to  
6 determine whether evidentiary hearings will be needed,  
7 and it's prudent to keep them on the calendar at this  
8 point. With regards to the schedule, Cal Advocates  
9 would like to address some of the proposed dates and  
10 milestones in the proposed schedule. Some of these have  
11 been raised by other parties.

12           Cal Advocates does recommend the Commission  
13 adopt the proposed schedule included in its protest for  
14 several reasons: One, for example, this proceeding is  
15 occurring concurrently with the CARE/ESA/FERA  
16 proceeding. As ALJ Fitch noted, many of the same  
17 parties and people are involved in these same  
18 proceedings, and so overlapping milestones and dates can  
19 create staffing constraints and resource constraints.

20           The proposed schedule circulated by your Honors  
21 this week has intervenor testimony due the same day as  
22 rebuttal testimony in the CARE/ESA/FERA proceeding.

23           The Cal Advocates' proposed schedule says  
24 November 2 as the date for intervenor testimony, which  
25 is a mere two-week buffer between deadlines, which is

1 necessary just to ensure stakeholders have a reasonable  
2 opportunity to participate in both proceedings.

3 As noted previously, the proposed schedule sets  
4 rebuttal testimony due on November 6.

5 Cal Advocates agrees with both PCE and SoCalGas  
6 that three weeks is likely not enough time given the  
7 number of parties and likely the breadth of testimony.

8 So additional time for parties to review other  
9 parties' opening testimony and draft rebuttal is  
10 necessary for a reasonable review.

11 Cal Advocates would direct your Honors and the  
12 Commission to its proposed schedule in its protest.  
13 Cal Advocates notes that its proposed schedule does lead  
14 to a final decision in August of 2027, which does appear  
15 to fit with the goal stated to have a decision issued in  
16 mid-2027 to provide time for parties to implement their  
17 programs in 2028.

18 That's all. Thank you, your Honor. ]

19 ALJ KAO: Thank you, Mr. Gibbs.

20 Next is TURN.

21 MS. LAZENBY: Thank you, your Honor. Ruthie  
22 Lazenby on behalf of The Utility Reform Network. TURN  
23 supports the schedule as proposed and has no additional  
24 comments at this time. Thank you.

25 ALJ KAO: Thank you, Ms. Lazenby.

1           Next is Greenlining.

2           MS. MILLER: Thank you, ALJ and Greenlining.  
3 Carmelita Miller for the Greenlining Institute. We  
4 support the proposed schedule, and we have no other  
5 comments regarding evidentiary hearings or  
6 categorization. Thank you.

7           ALJ KAO: Thank you, Ms. Miller.

8           Before we move to close, let me just check  
9 briefly with Judge Fitch if Judge Fitch has any further  
10 comments she wants to makes at this point.

11           ALJ FITCH: I was just going to add one thing  
12 related to the recommendation made by Cal Advocates for  
13 a decision in August. One of the things -- August of  
14 2027 I should say -- one of the things we were weighing  
15 when developing a schedule is we know there's going to  
16 be a potential and goals -- an updated goals decision  
17 next year as well, which also involves the same people,  
18 so we are trying not to have those under consideration  
19 concurrently, so a little bit earlier in the summer for  
20 this decision would be helpful.

21           The other consideration, I think, is the need  
22 to file advice letters related to the goals decision,  
23 but maybe also related to this decision.

24           Anyway, those are some priorities that we're  
25 juggling just to point that out. I don't have a

1 solution at this moment, but those are just things to  
2 keep in mind. We will talk about it, and we'll finalize  
3 the schedule in the scoping memo in consultation with,  
4 obviously, Commissioner Douglas' office.

5 That's all I have. Thank you.

6 ALJ KAO: Thanks, Judge Fitch.

7 Thank you, everyone, for your contributions  
8 today. All of the issues we have discussed today will  
9 be addressed by Commissioner Douglas in the forthcoming  
10 scoping memo. We thank you for your time and patience  
11 today. We hope you all stay safe and well.

12 We'll be adjourned. Off the record.

13 (At the hour of 3:35 p.m., this matter having  
14 been concluded, the Commission then  
15 adjourned.)

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BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE  
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING  
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