



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	



County of Los Angeles
INTERNAL SERVICES DEPARTMENT

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Los Angeles, California 90063

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"Trusted Partner and Provider of Choice"

October 16, 2023

Advice Letter 17-E/17-G
(CPUC Identification #940)

Public Utilities Commission of the State of California

**SUBJECT: COMPLIANCE FILING REGARDING SOUTHERN CALIFORNIA REGIONAL
ENERGY NETWORK 2024-2027 TRUE-UP ADVICE LETTER**

I. PURPOSE

The Southern California Regional Energy Network (SoCalREN) submits its 2024-2027 Energy Efficiency (EE) portfolio True-Up Advice Letter (TUAL) by Tier 2 Advice Letter (AL) to the California Public Utilities Commission (CPUC or Commission), in compliance with Decision (D.) 21-05-031, D.23-06-055, and guidance from the Commission's Energy Division (ED) Staff. This TUAL follows the format provided by ED, and required tables per ED guidance are included in Attachment A.

This TUAL provides budget information, programmatic adjustments, and updated supporting documentation for EE programs SoCalREN will offer in program years 2024-2027.

In summary, this AL requests a four-year portfolio budget of \$227,597,351, which will achieve \$103,422,805 in Total System Benefits (TSB), and savings forecasts of 126,114,470 net kWh and 2,487,095 net therms. The forecasted four-year portfolio Total Resource Cost (TRC) test for the Resource Acquisition segment is 0.50, and the TRC for the portfolio as a whole is 0.30. This AL also includes program segmentation updates. SoCalREN requests that the Commission approve its 2024-2027 TUAL, effective as of November 16, 2023.

II. **BACKGROUND**

A. Regulatory Requirements

The True-Up AL requirement was adopted in Decision D.21-05-031 with the requirement that each year on September 1, in the odd years when the EE potential and goals have been adopted by the Commission, each EE program administrator (PA) shall file either a portfolio true-up (prior to the start of a four-year portfolio) or a mid-cycle review (in year two of a four-year portfolio) Tier 2 AL adjusting technical inputs, forecasts, and portfolio to account for the changes in energy efficiency potential and goals.¹

D.23-06-055 approved PA Business Plans and required the following including updates based on the following:

- Guidance in D.21-05-031, such as adjustments to forecasts stemming from updated input, including TSB goals, avoided cost calculator updates, new database for energy efficiency (DEER) values, etc.;
- Updated statewide allocations and resulting budgets (within the authorized cap) and savings forecasts; and
- Updates or corrections to program segmentation.²
- The IOUs [investor-owned utilities] should reflect the updated statewide funding contributions in their 2023 True-Up advice letters.³
- The True-Up advice letter identified in Decision 21-05-031 as due on September 1, 2023 shall be due instead no later than 60 days after the Commission issues a decision updating the energy efficiency potential and goals in Rulemaking 13-11-005.⁴

D.23-08-005 adopted energy efficiency goals for 2024-2035. It was issued on August 16, 2023, thereby making the True Up Advice Letter due on October 16, 2023.

B. Filing Requirements

D.21-05-031 requires that each PA true-up advice letter meet the following criteria:

- The program administrator's portfolio must meet the TSB for the four years, adjusted by the updated TSB for the remaining period of the portfolio.

¹ D.21-05-031, Ordering Paragraph (OP) 10.

² D.23-06-055, p. 97.

³ *Id.*, Conclusion of Law (COL) 6.

⁴ *Id.*, OP 37.

- The portfolio must meet or exceed a forecasted TRC ratio of 1.0 for the resource acquisition segment of the portfolio (with the exception of RENs).
- The equity and market support segments of the portfolio, combined, must not exceed 30% of the total budget (with the exception of RENs).
- For IOUs: the statewide and third-party contribution percentage requirements must be met.
- The advice letters also must include a report on the progress against metrics relevant for each segment of the portfolio.⁵

In addition, D.23-06-055 requires:

- The True-Up advice letter should include updates based on the following:
 - Guidance in D.21-05-031, such as adjustments to forecasts stemming from updated input, including TSB goals, avoided cost calculator updates, new database for energy efficiency (DEER) values, etc.;
 - Updated statewide allocations and resulting budgets (within the authorized cap) and savings forecasts; and
 - Updates or corrections to program segmentation.
- The investor-owned utility portfolio administrators shall reflect the statewide contribution changes included in Tables 1, 2, and 3 of this decision in their True Up advice letters due in 2023 according to D.23-06-055.⁶
- The True-Up advice letter identified in D.21-05-031 as due on September 1, 2023 shall be due instead no later than 60 days after the Commission issues a decision updating the energy efficiency potential and goals in Rulemaking 13-11-005.⁷
- All of the non-REN PAs (IOUs plus Marin Clean Energy (MCE)) are to make available Market Access Programs (MAPs) to address both residential and commercial downstream retrofit opportunities in their territories, with start dates no later than July 1, 2024. In the MCE territory, MCE (as the originator of this program approach) should administer the MAP and not PG&E. These PAs should use existing processes (the true-up advice letter, third-party program advice letters, fund-shifting notifications, implementation plan submissions, etc.), as needed, to incorporate MAP plans into their portfolios.⁸

III. DISCUSSION

A. Portfolio Overview

- a. Recent CPUC Decisions impacting EE Portfolios
 - i. Natural Gas Incentives Phase Out (D.23-04-035)

⁵ D.21-05-031, pp. 42 – 43.

⁶ D.23-06-055, OP 1.

⁷ *Id.*, OP 37.

⁸ *Id.*, p. 75.

D.23-04-035 required several changes to how natural gas energy efficiency offerings may be provided by PAs. The Decision requires the following, among other items:

- 1) Establishes a framework that defines and allows continued funding of “exempt measures” - measures that result in gas savings but do not burn gas.
- 2) Establishes a means to determine whether a given measure is cost-effective.
- 3) Provides for working groups to examine and recommend technical guidance for identifying a viable electric alternative (for a given gas measure) and further criteria for custom projects.

The Decision further ordered that beginning in program year 2024 for residential and commercial resource acquisition and market support segments, ratepayer-funded incentives will no longer be authorized for non-exempt, non-cost-effective gas measures for new construction projects with no existing gas line, and for new construction projects with an existing gas line if gas usage will materially increase.

The final agreed-to viable electric alternative for specific measures may be impactful to SoCalREN’s portfolio but is not known at the time of this filing.

ii. EE Goals Decision (D.23-08-012)

D.23-08-012 adopts the Potential and Goals study to set goals for the IOUs, to in turn inform the planning activities of the PAs, as well as other entities. While the Decision does not set goals for RENs, it is impactful to SoCalREN in several respects. First, it provides directional information as to the achievable potential for SoCalREN’s resource acquisition segment programs. Second, it provides Inflation Reduction Act (IRA) implementation guidance, which requires that PAs create and maintain promotional and educational documentation to influence customers to use IRA tax credits. Further, PAs must identify which customers have received or plan to receive IRA tax incentives. Third, it affirms CARB’s State Implementation Plan (SIP) memo calling for requiring all new space and water heaters to be zero emission beginning in 2030, which is impactful to any long-term plans for natural gas efficiency space and water heater measures.⁹ Fourth, it impacts the deadline for this TUAL, per D.23-06-055 OP 37.

iii. Business Plan Applications (D.23-06-055)

⁹ 2022 State Strategy for the State Implementation Plan, pp. 101-103.

This Decision is very impactful to SoCalREN, most directly by authorizing funding for expanded and new programs for the communities it serves. The Decision enables SoCalREN to deliver energy and climate impacts, build energy capacity and economic resilience, and expand EE and its benefits to underserved and hard-to-reach communities.

While the impacts of this Decision are myriad, some particularly impactful elements to SoCalREN include the September 2024 joint advice letter discussing steps to mitigate program overlap, the March 2025 joint advice letter proposing goals for the Market Support and Equity segments, and SoCalREN's Community-Based Design Pilot. SoCalREN looks forward to working with the communities it serves to design and implement this pilot, and to coordinate with other interested PAs to share ideas and lessons learned.

iv. Potential and Goals and Modification of Portfolio Approval and Oversight Process (D.21-05-031)

This Decision, among other things, adopted the TSB as a new single metric, which expresses on annual basis, in dollar terms, the lifecycle value of energy, capacity and greenhouse gas benefits. This metric is impactful to the forecast approach process for resource acquisition programs as it shifts portfolios from targeting first year energy savings to savings that align with the actual avoided cost value of energy efficiency savings. The metrics kWh, kW and therms are still to be tracked and reported.

b. Portfolio Changes Other Than Those Necessitated by New CPUC Guidance

This advice letter comports with all CPUC guidance and does not propose changes outside of those requirements.

B. Summary of Forecasted Portfolio Impacts

As part of the TUAL planning process, SoCalREN developed an optimized portfolio that aims to drive deep energy savings. SoCalREN's portfolio also continues to support the Commission's objectives for RENs to serve hard-to-reach customers and to fill gaps within the EE portfolios. To continue optimizing its portfolio for its goals and requirements, SoCalREN proposes the following high-level adjustments to its 2024-2027 EE portfolio, as compared to its March 2022 application:

- Optimizing measures and programs that result in claimable savings to expand benefits and cost-effectiveness;
- Continuing to reduce portfolio costs by leveraging third-party implementation within in its portfolio in support of third-party proposed, designed, and delivered programs;

- Adjusting for inflationary cost increases.

SoCalREN’s approach to optimizing its portfolio included both a bottoms-up and a top-down approach. For its bottom-up strategy, SoCalREN assessed the measure mix offerings for each of its continuing and newly authorized programs to determine if any changes were necessary, including deemed values in electronic Technical Reference Manual (eTRM) as well as custom values. These included assessing changes since the March 2022 application to net-to-gross ratios, effective useful life (EUL) and remaining useful life values, load shapes, and other factors. Programs then optimized their measure mix to reflect these changes while striving to maximize achievable TSB, TRC, and energy savings while working within authorized budgets per D.23-06-055. SoCalREN then assessed impacts at the program and sector level, and finally at the portfolio level to determine the preferred approach. The preferred approach is reflected in this TUAL.

For its top-down strategy, SoCalREN assessed the distribution of budget, TSB, and other metrics at both the sector and segment level to reflect a balanced portfolio that aligns with its core values and with the CPUC’s objectives for RENs to serve hard-to-reach customers and fill gaps. From 2024-2027, SoCalREN intends to allocate 28 percent of its resources to the Equity segment, 35 percent to the Market Support segment, 32 percent to Resource Acquisition, 1 percent to Codes and Standards, and 4 percent to Evaluation, Measurement and Verification.

SoCalREN also adjusted its portfolio to reflect the impacts of inflation since the Business Plan was filed in March 2022. SoCalREN adjusted its programs with a five percent inflation impact.¹⁰ SoCalREN did not model the impacts of the Inflation Reduction Act (IRA), given there are currently no Commission directives on how to model IRA’s impacts. The below tables demonstrate the benefits and other metrics of the 2024-2027 portfolio. Relevant details are discussed in the below Section IV.

Table 1 shows the 2024-2027 portfolio impacts from SoCalREN’s TUAL optimization process.

Table 1: Summary of 2024-2027 SoCalREN Portfolio Impacts

	Budget	Total System Benefit	Total Resource Cost	Net kWh Savings	Net Therms
Application	\$226,097,351	\$108,693,300	0.33	188,400,000	2,340,491
TUAL	\$227,597,351	\$103,422,805	0.30	126,114,470	2,487,095
TUAL less Application [1]	\$1,500,000	-\$5,270,495	-0.03	-62,285,530	146,604

[1] TUAL Budget includes authorized incremental Community-Based Design Pilot

¹⁰ Current US Inflation Rates: 2000-2023, and subject matter expertise. <https://www.usinflationcalculator.com/inflation/current-inflation-rates/>.

IV. 2024-2027 ENERGY EFFICIENCY PORTFOLIO DETAILS

A. Total System Benefit

SoCalREN will continue its proven approach to market support and equity program implementation but will complement its portfolio with resource acquisition programs designed to fill gaps in the portfolio and target hard-to-reach customers. These programs are designed to deliver TSB, which will increase over the four-year term of the proposed portfolio.

There are several reasons that drove this change in TSB, some of which impacted TSB in opposite directions and thus partially mitigated the impacts of one another. Broadly, there were three primary items that impacted TSB. First, the 2024 avoided cost calculator (ACC) (replacing the 2022 ACC) in aggregate increased TSB values, though the TSB of some programs and measures were reduced. Second, inflation increased costs, reducing the number of some forecasted measure installations and thus reduced TSB. Third, changes in measure packages since the application filing as reflected in eTRM are unique to each measure, but some measures which were included in SoCalREN’s application either became ineligible or their values were reduced.

Significant portfolio changes contributing to TSB:

As shown in Table 2 below, this TUAL adjusts the cumulative four-year TSB to \$103,422,805, which represents a five percent reduction in TSB relative to the Business Plan application.

Table 2: SoCalREN 2024-2027 Portfolio Total System Benefit

SoCalREN Filing	2024-2027 Portfolio Total System Benefit
Business Plan Application	\$108,693,300
True-Up Advice Letter	\$103,422,805

B. Total Resource Cost

The 2021 Decision Assessment of Energy Efficiency Potential and Goals and Modification of Portfolio Approval and Oversight Process determined that Regional Energy Networks are not required to ensure that their energy efficiency resource acquisition programs exceed a 1.0 TRC

on a forecasted basis.¹¹ Nonetheless, SoCalREN has designed its portfolio with the aim to increase cost-effectiveness over time.

Significant portfolio changes contributing to TRC:

The TUAL represents a twelve percent reduction in TRC relative to the Business Plan application, as shown in Table 3.

Table 3: SoCalREN 2024-2027 Portfolio Total System Benefit

SoCalREN Filing	2024-2027 Portfolio Total Resource Cost
Business Plan Application	0.34
True-Up Advice Letter	0.30

C. Market Support & Equity

The 2021 Decision on Assessment of Energy Efficiency Potential and Goals and Modification of Portfolio Approval and Oversight Process requires portfolio administrators to limit the percentage of portfolio budgets spent on market support and equity programs to 30 percent, with the exception of RENs.¹² Thus this requirement does not apply to SoCalREN.

Per guidance in D.23-06-055¹³, the True-Up advice letter should include updates or corrections to program segmentation. SoCalREN will re-segment three programs in total from the Residential and Workforce Education and Training (WE&T) sectors.

Table 4: Updated SoCalREN Program Segmentation

Program ID	Program Name	Business Plan Segmentation	True-Up Advice Letter Segmentation
SCR-WET-D2	ACES Pathway	Market Support	Equity
SCR-WET-D3	Green Path Careers	Market Support	Equity
SCR-RES-A4	Kits for Kids	Resource Acquisition	Market Support

¹¹ D.21-05-031, Conclusion of Law (COL) 8.

¹² D.21-05-031, p. 23.

¹³ D.23-06-055, p. 97.

Rationale for re-segmentation:

ACES Pathway: SoCalREN's Application Exhibit 2 p. 65 categorized this program as Equity. The program was inadvertently marked as Market Support in CEDARS. SoCalREN is rectifying this error in this True-Up advice letter.

Green Path Careers: Similar to ACES, this program was categorized as Equity in the Application but inadvertently marked as Market Support in CEDARS. SoCalREN is rectifying this error in this True-Up advice letter.

Kits for Kids: A primary objective of this program is education. SoCalREN's Application Exhibit 2 p. 60 states that the "Primary objective is to educate school-age children and to drive Action". SoCalREN has determined the program is a better fit under Market Support. D.23-06-055 provides the example listed under Market Support Sub-Objective #1 "Demand" as "educating customers".¹⁴ This segmentation change thus comports with Commission guidance.

Significant portfolio changes contributing to Market Support & Equity:

In its application, SoCalREN discussed five core principles, among which was Principle #2: Balanced portfolio across segments.¹⁵ This True-Up advice letter continues to comport with this and the other core principles. As such, changes to the Market Support and Equity budgets and TSB in this True-Up advice letter do not vary significantly from the values forecasted in the Business Plan application.

D. Statewide/Third Party Compliance

This section is not applicable to SoCalREN per guidance provided in the True-Up advice letter template provided by Energy Division.

Significant portfolio changes contributing to SW/Third Party Compliance:

Changes contributing to Statewide and Third-Party Compliance is not applicable to SoCalREN.

¹⁴ D.23-06-055, p. 58.

¹⁵ SoCalREN 2024-2031 Strategic Business Plan, Exhibit 1, p. 9.

Solicitations

SoCalREN intends to solicit its entire 2024-2027 portfolio by issuing two to three solicitations per month beginning in October 2023.

E. Progress on segment metrics – Introduction to metrics

In compliance with D.23-06-055, SoCalREN is moving forward with tracking the relevant adopted indicators for the Market Support and Equity segments.¹⁶ SoCalREN is also looking forward to engaging with the PAs as well as California Energy Efficiency Coordinating Committee (CAEECC) to further discuss valuation methodologies and provide clarifying recommendations. This engagement will culminate in a joint PA Tier 2 advice letter submitted by May 1, 2024 clarifying the indicators, as well as identifying information that could be used as baselines for future targets, or methodologies for how the indicator information can be used as baselines. The advice letter will also make recommendations on metric removal, suspension, or modification from those included in D.18-05-041.¹⁷ Further, SoCalREN looks forward to participating in discussions that will lead to a joint Tier 3 advice letter to be submitted by March 1, 2025 which will make recommendations on the process for setting Market Support and Equity the goals, including annual targets, goal metrics, and forecast values.¹⁸

For Resource Acquisition-related metrics, SoCalREN continues to report on relevant metrics based on the common metrics list, as reported in annual reports and CEDARS.¹⁹ Finally, SoCalREN notes that on August 20, 2023, the Energy Division's Public Document Area (PDA) published the final Year 4 Assessment of Regional Energy Networks.²⁰ The assessment provided a generally favorable assessment of Regional Energy Networks' progress, and concluded that SoCalREN's was proceeding appropriately with the creation of value metrics:

"Based on a review of SoCalREN's proposed baseline and targets, the evaluation team concludes that the REN has set clear and measurable targets for their value metrics as evidenced by clearly delineated value metric baseline years and values, as well as by the presence of individual

¹⁶ D. 23-06-035, pp. 60-63.

¹⁷ *Id.*, OP 11, pp. 29-30.

¹⁸ *Id.*, OP 25, pp. 69-71.

¹⁹ D.18-05-041, Attachment A.

²⁰ PDA,

<https://pda.energydataweb.com/api/view/2830/CPUC%20Group%20B%20D22%20Y4%20Assessment%20Report%20Final%202023.08.30.pdf>

targets for all currently approved sectors for program years 2024 through 2027. Based on our review of SoCalREN's data, internal dashboards, and in-depth interviews, the evaluation team finds that all proposed value metrics appear to be suitable for quantitative assessments in future evaluations once final targets and baselines are approved."²¹

F. Request to Open / Significantly Change Programs (Optional)

SoCalREN is not proposing to open any programs, or make significant changes, that have not already been proposed and approved in the Business Plan application.

G. Request for Program Closures (Optional)

SoCalREN is not proposing to close any programs in this advice letter filing.

H. Evaluation Measurement & Verification (EM&V)

EM&V funds will be used to improve SoCalREN's portfolio of programs and ensure that the programs are collecting data to support evaluation needs.

A comprehensive workplan will be developed at the beginning of each program year to identify the study needs in the portfolio, determine the timeframe, and allocate the budget per study. The annual workplan may include updates or build upon studies conducted in previous years. The workplan will include the following four types of research activities:

- Evaluability Studies to ensure that the program goals are well defined and plausible (given the program activities in the logic model), that targets are set, and that the program is cost efficiently collecting data to support future impact studies and/or metrics.
- Process Evaluation Studies to examine how to improve the programs and/or improve the participant experience.
- Market Studies to understand gaps in the market, understand how to better serve target audiences, or understand new services.
- Ad Hoc Research Support to support quick turn-around research, provide direct SoCalREN support, or assist with other needs such as providing or reviewing information for CPUC-led studies.

SoCalREN expects the nature of the work to change over the four-year period. In 2024-2025, a large part of SoCalREN's EM&V funds will be spent on evaluability studies since many programs are new.

²¹ *ID.*, p. 44.

I. Cost Recovery

SoCalREN will continue cost recovery as discussed in D.23-06-055.²² Any costs associated with Integrated Demand Side Management (IDSM) programs that SoCalREN may propose would be discussed in its March 15, 2024 Tier 3 advice letter.²³

J. Misc. / Corrections

SoCalREN has no additional miscellaneous comments or corrections to add within this advice letter filing.

Protests

Anyone may protest this Advice Letter. The protest must state the grounds upon which it is based. The protest must be made in writing and received by the Commission within 20 days of the date this Advice Letter was filed with the Commission. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

Public Utilities Commission
CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. It is also requested that a copy of the protest be sent by email to addresses shown below on the same date it is mailed or delivered to the Commission.

Minh Le
Energy and Environmental Services
General Manager
County of Los Angeles Office
1100 North Eastern Avenue
Los Angeles, CA 90063-3200
(323) 267-2006
MSLe@isd.lacounty.gov

²² D.23-06-055, p. 16, COL 13.

²³ *Id.*, Ordering Paragraph 28, 29.

Effective Date

Per D.21-05-031 and D.23-06-055 this Advice Letter is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to General Order (GO) 96-B. The SoCalREN respectfully requests that this Advice Letter be made effective on November 16, 2023, which is 30 calendar days after the date filed.

Notice

A copy of this Advice Letter is being sent to the Commission's service lists for R.13-11-005 and A.22-02-005 (et al.). For changes to R.13-11-005 or A.22-02-005 (et al.) service lists, please contact the Commission's Process Office at 415-703-2021 or by electronic mail at process_office@cpuc.ca.gov.

Respectfully Submitted,

/s/ Minh Le

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ATTACHMENT A

SoCaIREN 2024-2027 TUAL Tables

Appendix 1 - 2024 - 2027 Program Portfolio Budget and Targets

(a) Program ID	(b) Program Name	(c) Target Exm	(d) Program Ty	(e) Business Sec	(f) Portfolio Strme	(g) Budget	(h) TSB	(i) MWh	(j) kW	(k) Tm	(l) Change Notes
SCR-AGR-G1	Agriculture Project Delivery Program	Yes	Core PA	Agricultural	Market Support	\$ 2,677,500	\$ -	-	-	-	-
SCR-AGR-G2	Rural-HTR Agriculture ADI	No	Core PA	Agricultural	Equity	\$ 9,870,257	\$ 3,869,851	2,554,183	-	249,537	With decreased 48% primarily due to deemed measure package updates and measure mix optimization
SCR-AGR-G3	Agriculture Retrofit	No	Core PA	Agricultural	Resource Acquisition	\$ 7,259,549	\$ 22,411,624	40,688,689	42,590	66	With decreased 28% primarily due to custom measure mix optimization
SCR-COME2	California Green Business Network	Yes	Core PA	Commercial	Market Support	\$ 2,221,292	\$ -	-	-	-	-
SCR-COME3	Food Desert Energy Efficiency Equity Pilot	Yes	Core PA	Commercial	Equity	\$ 13,967,493	\$ 1,976,629	2,615,218	-	323	With increased 61% primarily due to updated ACC and measure package updates
SCR-COME4	Small & Medium Business Energy Advc	Yes	Core PA	Commercial	Market Support	\$ 3,054,154	\$ -	-	-	-	-
SCR-COME5	Small Commercial Direct Install Program	No	Core PA	Commercial	Equity	\$ 9,100,000	\$ 1,224,865	1,784,919	-	82	With increased 15% & TSB increased 95% primarily due to measure mix optimization
SCR-EM-A1	SCR-EM Energy Compliance Effort	Yes	Core PA	EM&E	Equity	\$ 5,500,000	\$ -	-	-	-	-
SCR-EM-A2	SCR-EM Energy Compliance Effort	Yes	Core PA	EM&E	Equity	\$ 2,148,200	\$ -	-	-	-	-
SCR-FMC-1	Public Agency Revolving Loan Fund	Yes	Core PA	Finance	Market Support	\$ 2,104,200	\$ -	-	-	-	-
SCR-FMC-2	Public Agency Revolving Loan Fund	Yes	Core PA	Finance	Market Support	\$ 33,484,791	\$ -	-	-	-	-
SCR-PUBL-81	Energy Efficiency Project Delivery Program	Yes	Core PA	Public	Resource Acquisition	\$ 8,596,260	\$ 6,655,629	14,425,791	1,301	7,301	-
SCR-PUBL-82	Distributed Energy Resource Disincentive	Yes	Core PA	Public	Resource Acquisition	\$ 4,608,206	\$ -	-	-	-	-
SCR-PUBL-83	Public Agency NMEC Program	No	Core PA	Public	Resource Acquisition	\$ 5,533,656	\$ 10,709,526	17,346,789	2,603	2,603	-
SCR-PUBL-84	Streamlined Savings Program	No	Core PA	Public	Resource Acquisition	\$ 7,642,096	\$ 10,696,232	6,766,608	2,180	705,870	With decreased 63%
SCR-PUBL-85	Rural-HTR Public Agency Direct Install	No	Core PA	Public	Equity	\$ 8,242,060	\$ 3,884,833	2,817,320	-	130	453,884 With decreased 13%, primarily due to increased fuel substitution measures
SCR-PUBL-86	Energy Resiliency Action Plan	Yes	Core PA	Public	Market Support	\$ 5,843,000	\$ -	-	-	-	-
SCR-PUBL-87	Regional Partner Initiatives	Yes	Core PA	Public	Market Support	\$ 2,612,500	\$ -	-	-	-	-
SCR-PUBL-88	Water & Wastewater Strategic Energy M	No	Core PA	Public	Market Support	\$ 7,882,465	\$ 5,767,443	17,689,244	9,496	9,496	-
SCR-PUBL-89	Underserved Schools Strategic Energy M	No	Core PA	Public	Market Support	\$ 5,469,462	\$ 1,441,326	5,683,964	1,572	1,572	-
SCR-RES-A1	Multifamily Program	No	Core PA	Residential	Resource Acquisition	\$ 31,416,953	\$ 26,839,264	10,806,689	796	205,197	697,103 With decreased 40% primarily due to updated measure NTO values
SCR-RES-A4	Residential KioskKds	No	Core PA	Residential	Market Support	\$ 7,797,742	\$ 3,984,570	4,616,955	63	191,736	TSB increased 31% primarily due to deemed measure package updates and measure optimization
SCR-RES-A5	Small HTR Multifamily Direct Install	No	Core PA	Residential	Resource Acquisition	\$ 9,386,846	\$ 4,629,057	3,514,264	1,297	-	-
SCR-WEI-D2	ACES Pathway	Yes	Core PA	WE&T	Equity	\$ 1,974,000	\$ -	-	-	-	-
SCR-WEI-D3	Green Path Careers	Yes	Core PA	WE&T	Equity	\$ 3,337,000	\$ -	-	-	-	-
SCR-WEI-D4	Green Path Training	Yes	Core PA	WE&T	Equity	\$ 2,612,000	\$ -	-	-	-	-
SCR-WEI-D5	WE&T Operations Hub	Yes	Core PA	WE&T	Market Support	\$ 674,200	\$ -	-	-	-	-
SCR-WEI-D6	WE&T Operations Hub	Yes	Core PA	WE&T	Market Support	\$ 1,880,000	\$ -	-	-	-	-
SCR-WEI-D8	E-Connector Academy	Yes	Core PA	WE&T	Market Support	\$ 298,000	\$ -	-	-	-	-
SCR-CS	Portfolio Cores & Standards Portfolio Support PA	Yes	Core PA	Portfolio Support	Cores & Standards	\$ 298,000	\$ -	-	-	-	-
SCR-MS	Portfolio Cores & Standards Portfolio Support PA	Yes	Core PA	Portfolio Support	Resource Acquisition	\$ 3,140,461	\$ -	-	-	-	-
SCR-MS	Portfolio Cores & Standards Portfolio Support PA	Yes	Core PA	Portfolio Support	Resource Acquisition	\$ 4,676,435	\$ -	-	-	-	-
SCR-EQ	Equity Portfolio Support PACasts	Yes	Core PA	Portfolio Support	Equity	\$ 4,857,979	\$ -	-	-	-	-
SCR-CBD-C-01	SCR-AREN Community Based Design C	Yes	Core PA	Portfolio Support	Market Support	\$ 1,500,000	\$ -	-	-	-	-
Total						\$ 221,040,769	103,422,866	126,114,470	62,605	2,467,985	

Table 1.1 - Portfolio Budget by Sector and Segment (Cumulative for PY 2024-2027)

Line	Budget Category	Program Segment				Total
		Resource Acquisition	Market Support	Equity	Codes & Standards	
1	Residential Sector	\$40,815,799	\$7,797,742	\$0	\$0	\$48,613,541
2	Commercial Sector	\$0	\$5,315,446	\$23,077,498	\$0	\$28,392,944
3	Industrial Sector	\$0	\$0	\$0	\$0	\$0
4	Agricultural Sector	\$7,258,549	\$2,677,500	\$9,870,257	\$0	\$19,806,306
5	Public Sector	\$21,772,031	\$49,822,732	\$18,318,748	\$0	\$89,913,511
6	Cross Cutting Sector					
7	Emerging Tech	\$0	\$0	\$0	\$0	\$0
8	WE&T	\$0	\$5,029,000	\$5,311,000	\$0	\$10,340,000
9	Finance		\$2,104,200	\$2,196,100	\$0	\$4,300,300
10	Codes & Standards	\$0	\$0	\$0	\$2,682,000	\$2,682,000
11	Portfolio Support	\$4,408,244	\$6,185,958	\$3,709,403	\$169,270	\$14,472,875
12	OBF Loan Pool					\$0
13	Portfolio Subtotal [1]	\$74,254,623	\$78,932,578	\$62,483,006	\$2,851,270	\$218,521,477

[1] excludes EM&V and Portfolio Oversight

Table 1.2 - Total Cost Recovery Request, Including REN/CCA and Other Costs

Line	Program Administrator	(a) PA Programs	(b) ED Portfolio Oversight	(c) EMV PA	(d) EMV ED	(e) Unspent & Uncommitted Funds for 2024-2027 Offset	(f) Total
1	AL Author PA name - SoCalREN	\$218,521,477	\$0	\$2,519,292	\$6,556,582	\$0	\$227,597,351
2	REN/CCA 1 (as applicable) - <i>insert name here</i>		\$0	\$0	\$0	\$0	\$0
3	REN/CCA 2 (as applicable) - <i>insert name here</i>		\$0	\$0	\$0	\$0	\$0
4	REN/CCA 3 (as applicable) - <i>insert name here</i>		\$0	\$0	\$0	\$0	\$0
5	REN/CCA 4 (as applicable) - <i>insert name here</i>		\$0	\$0	\$0	\$0	\$0
6	REN/CCA 5 (as applicable) - <i>insert name here</i>		\$0	\$0	\$0	\$0	\$0
7	Total	\$218,521,477	\$0	\$2,519,292	\$6,556,582	\$0	\$227,597,351

Table 2.1 - Annual and Cumulative Total System Benefit Forecast

Line	Segment	PY 2024	PY 2025	PY 2026	PY 2027	Cumulative
1	Resource Acquisition	\$12,028,280	\$20,200,321	\$23,028,470	\$26,236,181	\$81,493,252
2	Market Support	\$986,101	\$3,475,789	\$2,465,022	\$2,425,101	\$9,352,013
3	Equity	\$1,292,092	\$3,059,752	\$3,859,654	\$4,366,042	\$12,577,540
4	Total TSB Forecast	\$14,306,473	\$26,735,862	\$29,353,146	\$33,027,324	\$103,422,805
5	CPUC TSB Goal	NA	NA	NA	NA	\$0
6	<i>TSB Forecast / TSB Goal</i>	NA	NA	NA	NA	NA

Table 2.2 - Annual and Cumulative Codes and Standards Savings Forecast

Line	Savings Unit	PY 2024	PY 2025	PY 2026	PY 2027	Cumulative
1	GWh Forecast	0	0	0	0	0.0
2	GWh CPUC Goal [1]	0.0	0.0	0.0	0.0	0.0
3	<i>GWh Forecast/Goal</i>	-	-	-	-	-
4	MW Forecast	0	0	0	0	0.0
5	MW CPUC Goal [1]	0.0	0.0	0.0	0.0	0.0
6	<i>MW Forecast/Goal</i>	-	-	-	-	-
7	MMThm Forecast	0.0	0.0	0.0	0.0	0.0
8	MMThm CPUC Goal [1]	0.0	0.0	0.0	0.0	0.0
9	<i>MMThm Forecast/Goal</i>	-	-	-	-	-

1. Savings Goals as adopted in CPUC Decision 23-08-xxx

Table 2.3 - Annual and Cumulative Budget

Line	Segment	PY 2024	PY 2025	PY 2026	PY 2027	Cumulative
1	Resource Acquisition	\$15,696,484	\$16,843,188	\$18,547,169	\$21,899,999	\$72,986,840
2	Market Support	\$17,623,601	\$19,052,710	\$20,686,002	\$21,560,741	\$78,923,054
3	Equity	\$7,398,739	\$16,172,138	\$17,239,279	\$22,821,427	\$63,631,583
4	Codes and Standards	\$650,000	\$720,000	\$810,000	\$800,000	\$2,980,000
5	EM&V (PA and ED)	\$1,742,425	\$2,203,341	\$2,372,771	\$2,757,337	\$9,075,874
6	Total Budget w/o OBF Loan Pool	\$43,111,249	\$54,991,377	\$59,655,221	\$69,839,504	\$227,597,351
7	Market Support and Equity, percent of Total Budget w/o OBF Loan Pool					62.6%
8	OBF Loan Pool Addition	\$0	\$0	\$0	\$0	\$0
9	Budget excluding Portfolio Oversight	\$43,111,249	\$54,991,377	\$59,655,221	\$69,839,504	\$227,597,351
10	ED Portfolio Oversight					\$0
11	Total Portfolio Budget w/ ED Portfolio Oversight	\$43,111,249	\$54,991,377	\$59,655,221	\$69,839,504	\$227,597,351
12	Approved Budget Cap [1]					\$227,597,351

Table 3 - Portfolio Cost Effectiveness Ratios (PY 2024-2027)

Line			TRC ratio	PAC ratio	RIM ratio
1	Segment	Resource Acquisition	0.50	1.09	0.69
2		Market Support	0.10	0.12	0.12
3		Equity	0.15	0.19	0.18
4		Codes and Standards (C&S)	0.00	0.00	0.00
5	Portfolio	<i>Including C&S</i>	0.30	0.46	0.38
6		<i>Excluding C&S</i>	0.30	0.47	0.39

Table 4 - Portfolio Statewide and Third-party Contribution Percentage Requirements (IOU only)

Line	Budget Component	Qualifying Budget	Cumulative Total Budget w/o OBF Loan Pool	Contribution Percentage	Minimum Threshold
1	Statewide [1]	\$0	\$227,597,351	0.0%	20%
2	Third-party [2]	\$0	\$227,597,351	0.0%	60%

1 Statewide program definition per D.16-08-019, and updated per D.18-05-041

2 Third party program definition per D.16-08-019, OP 10