



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: Inland Regional Energy Network #246

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Casey Dailey

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### EXPLANATION OF UTILITY TYPE

ELC = Electric  
PLC = Pipeline

GAS = Gas  
HEAT = Heat

WATER = Water

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 3-E-G

Tier Designation: 2

Subject of AL: I-REN 2024-2027 Energy Efficiency Portfolio True-Up Advice Letter

Keywords (choose from CPUC listing):

AL Type:  Monthly  Quarterly  Annual  One-Time  Other: Prior to start of a four-year portfolio

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

In compliance with D.21-05-031, D.21-11-013, D.21-09-037 and D.23-06-055

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

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: 11/15/23

No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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: N/A

Service affected and changes proposed<sup>1</sup>: None

Pending advice letters that revise the same tariff sheets: None

<sup>1</sup>Discuss in AL if more space is needed.

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

California Public Utilities Commission  
Energy Division Tariff Unit Email:  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Contact Name: Casev Dailey  
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Utility/Entity Name: I-REN (#246)

Telephone (xxx) xxx-xxxx: (951) 405-6720  
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CPUC  
Energy Division Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

**Clear Form**

## 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
Curtailable 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	



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**October 16, 2023**

California Public Utilities Commission  
Energy Division Tariff Unit  
505 Van Ness Ave.  
Fourth Floor  
San Francisco, CA 94102-3298

**I-REN Advice Letter 3-E-G**

(Inland Regional Energy Network ID #246)

**Tier Designation**

This Advice Letter has a Tier 2 designation pursuant to Decision (D.) 21-05-031, Ordering Paragraph (OP) 10.

**Subject**

I-REN 2024-2027 Energy Efficiency Portfolio True-Up Advice Letter

**I. Purpose**

The purpose of this Tier 2 advice letter is to true-up the portfolio and savings forecast of Inland Regional Energy Network (I-REN) following the approval of its portfolio in the California Public Utilities Commission (CPUC or Commission) Decision (D.) 21-11-013 Approval Of Inland Regional Energy Network Energy Efficiency Business Plan.<sup>1</sup> This advice letter is filed in compliance with Ordering Paragraph (OP) 38 of D.23-06-055, which directs portfolio administrators (PAs)<sup>2</sup> to submit their true-up advice letter (TUAL) no later than 60 days after the Commission issues a decision updating the energy efficiency potential and goals in Rulemaking 13-11-005.

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<sup>1</sup> D.21-11-013 OP 7.

<sup>2</sup> Per D.23-06-055 page 3, footnote 1, "In the past, the Commission has used the abbreviation "PAs" to refer to "program administrators." However, as much of the portfolio has transitioned to being third-party designed and delivered, in this decision we are moving to the use of the term "portfolio administrator," but using the same "PA" abbreviation."

We are a network of partners, including the Coachella Valley Association of Governments, the San Bernardino Council of Governments, and the Western Riverside Council of Governments, formed to serve the cities and communities of our region.



## II. Background

Initiated in 2019, the proposed Inland Regional Energy Network (I-REN) is a consortium of the Western Riverside Council of Governments (WRCOG), Coachella Valley Association of Governments (CVAG), and San Bernardino Council of Governments (SBCOG) that serve the counties of San Bernardino and Riverside. In February 2021, I-REN applied for REN PA status to offer a portfolio of programs serving the Public Sector, Codes & Standards, and Workforce Education & Training, with governance from WRCOG as administrative lead agency as well as SBCOG and CVAG.<sup>3</sup> I-REN was approved by the CPUC on November 18, 2021, in D.21-11-013 with a budget of \$65,577,932 to be funded through program years 2022 to 2027.

Collectively known as the Inland Empire, the I-REN service area of the counties of Riverside and San Bernardino counties includes 11% of California's population, but its geographic arrangement, population, and distance from the state's major metropolitan areas result in inconsistent and insufficient service to the region. Further, the region is distinct from other southern California areas—particularly Los Angeles—with its own robust character, culture, and identity.

Historically, the Inland Empire has faced challenges in receiving equitable opportunities to participate in energy efficiency and advanced energy. As dedicated representatives of local government, I-REN consortium members bring established connections from their work serving this region to be able to provide support to fill gaps in existing energy efficiency services. With the implementation of its first business plan I-REN is establishing locally administered programs and services to ensure ratepayers in this region can become active participants in meeting California energy efficiency goals and equitably benefit from ratepayer-funded energy efficiency.

In approving I-REN in D.21-11-013, the Commission stated that I-REN's business plan complies with the requirements of D.12-11-015 and D.19-12-021 for targeting hard-to-reach customers, filling gaps, and complementing other program administrators' portfolios.<sup>4</sup> Moreover, the Commission indicated that I-

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<sup>3</sup> Motion of the Western Riverside Council of Governments on Behalf of the Inland Regional Energy Network (I-REN), for Approval of its Energy Efficiency Rolling Portfolio Business Plan and Budget, February 26, 2021.

<sup>4</sup> D.21-11-013 Conclusion of Law (COL) 4.

REN's "focus on equity and serving disadvantaged and underserved communities is welcome and consistent with the Commission's ESJ Action Plan."<sup>5</sup>

Because I-REN was approved after the submittal of the Biennial Budget Advice Letter (BBAL) in November 2021, this is I-REN's first such submittal. In preparing this TUAL I-REN has followed Commission direction and adhered to stakeholder guidance and best practices wherever available to inform revisions to its budget and updates to savings forecasts. Budget revisions include rolling over unspent funds from 2022-2023, allocating funding for integrated demand-side management (IDSM), and distinguishing between program implementation costs and portfolio administration PA costs. Savings and Total System Benefit forecasts have been adjusted and run against 2024 Cost-Effectiveness Tool (CET) Avoided Cost Version (2022/E-5228), informed by updated inputs from I-REN's implementer contracted for its resource program. I-REN is not opening or closing any programs at this time. This TUAL also provides an update on I-REN's progress related to metrics for each segment of its portfolio.

### **A. Regulatory Requirements**

The True-Up Advice Letter requirement was adopted in Decision (D.) 21-05-031 with the requirement that each year on September 1, in the odd years when the energy efficiency (EE) potential and goals have been adopted by the Commission, each EE 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 advice letter adjusting technical inputs, forecasts, and portfolio to account for the changes in energy efficiency potential and goals.<sup>6</sup>

Because the potential and goals decision does not set goals for non-investor owned utility (IOU) PAs, D.21-09-037 established that non-IOU PAs may propose to revise their goals and savings forecast in the true-up or mid-cycle advice letters.

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<sup>5</sup> D.21-11-013 COL 7.

<sup>6</sup> D.21-05-031 at Ordering Paragraph (OP) 10.

D.23-06-055 approved Business Plans for PAs other than I-REN, who had been approved in D.21-11-013, 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.
- COL 6: The IOUs should reflect the updated statewide funding contributions in their 2023 True-Up advice letters.
- OP 38: 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.

D.23-08-005 updating potential and goals was issued on August 16, 2023, thereby making the True Up Advice Letter due on October 16, 2023. IOU PAs will incorporate goals within D.23-08-005 into the TUAL.

## **B. Filing Requirements**

I-REN's true-up advice letter meets applicable CPUC requirements from decisions including but not limited to D.23-06-055, D.21-05-031, D.21-09-037, and D.21-11-013, as summarized below and detailed in the TUAL submittal.

D.21-05-031 requires that each PA's true-up advice letter must meet the criteria listed below. I-REN's TUAL meets the criteria relevant to REN PAs and provides a report on the progress against metrics relevant for each segment of the portfolio.

- 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.
- 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.<sup>7</sup>

D.21-05-031 also directed PAs to distinguish between Program Implementation Costs and Portfolio Administration (i.e., Overhead). (p.32-35). I-REN has adjusted its budget to distinguish between the two types of costs as recommended by the CAEECC proposal and addressed in D.21-05-031, informed by the guidance documents prepared by the joint PAs.

D.21-09-037 established that non-IOU PAs may propose to revise their goals and savings forecast in the true-up or mid-cycle advice letters, saying that any such proposal must specifically identify the factor(s) impacting the proposed revision. I-REN has revised its goals and savings forecast in this TUAL and has specifically identified the factors impacting the proposed revision as detailed in the following TUAL sections:

- Chapter III Section A. Portfolio Overview
- Chapter III Section A. Subsection IREN-PUBL-002: Public Buildings NMEC Program
- Chapter III Section B. Summary of Forecasted Portfolio Impacts
- Chapter IV Sections A and B

D.23-06-055 directed that the True-Up advice letter should include updates based on the factors listed below.<sup>8</sup> Accordingly, I-REN has included adjustments to forecasts. I-REN's program segmentation has not changed.

- 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.

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<sup>7</sup> D.21-05-031 at 42 – 43.

<sup>8</sup> D.23-06-055 at 97.

Other guidance in D.23-06-55 is as follows. Note that statewide contributions and market access program (MAP) guidance are not applicable to I-REN as a REN PA.

- 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.21-05-031. (OP 1)
- 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. (OP 38)
- We will require all of the non-REN PAs (IOUs plus MCE) to make available MAP programs 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. (p.72)

### III. Discussion

#### A. Portfolio Overview

The following sections present a summary of I-REN's portfolio, followed by program-specific details.

##### **Portfolio Summary**

This portfolio summary shows I-REN's budget by sector and segment, and includes narrative describing I-REN's portfolio composition, impacts of recent Commission decisions, and other portfolio-wide changes and considerations.

**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	\$0	\$0	\$0	\$0	\$0
2	Commercial Sector	\$0	\$0	\$0	\$0	\$0
3	Industrial Sector	\$0	\$0	\$0	\$0	\$0
4	Agricultural Sector	\$0	\$0	\$0	\$0	\$0
5	Public Sector	\$0	\$0	\$34,321,123	\$0	\$34,321,123
6	Cross Cutting Sector					
7	Emerging Tech	\$0	\$0	\$0	\$0	\$0
8	WE&T	\$0	\$13,071,849	\$0	\$0	\$13,071,849
9	Finance	\$0	\$0	\$0	\$0	\$0
10	Codes & Standards	\$0	\$0	\$0	\$7,280,292	\$7,280,292
11	Portfolio Support	\$0	\$0	\$0	\$0	\$0
12	OBF Loan Pool					\$0
13	Portfolio Subtotal [1]	\$0	\$13,071,849	\$34,321,123	\$7,280,292	\$54,673,263

##### Portfolio Composition

I-REN's program portfolio composition remains the same as filed in its business plan application, with six existing programs in three sectors: Public, Codes and Standards (C&S), and Workforce Education and Training (WE&T). I-REN's portfolio includes one resource program designed to deliver energy savings: the Public Sector Normalized Metered Energy Consumption NMEC program.

As of the time of this TUAL submittal, I-REN has not made any updates or corrections to its program segmentation. In D.21-11-013 approving I-REN's

energy efficiency business plan, the Commission ordered I-REN to file a Tier 2 advice letter by July 1, 2022, with its portfolio segmentation strategy and metrics.<sup>9</sup> That advice letter is publicly available here: Advice No. 2-E-G 2022 Metrics and Portfolio Segmentation of I-REN, Pursuant to Decision (D.) 18-05-041, D.21-11-013, and D.21-05-031. I-REN's public sector programs are categorized within the equity segment, and its WE&T programs are categorized as market support. I-REN's C&S programs remain separate as previously defined in D.12-05-015.

I-REN's portfolio does not include programs within the resource acquisition segment, and thus is not subject to the recent direction in D.23-06-055 regarding transitioning programs to use NMEC;<sup>10</sup> however, I-REN's resource program in the equity segment was already established in the business plan as an NMEC program.

#### Impacts of Recent CPUC Decisions

While the potential and goals decision does not set goals for non-IOU PAs, D.23-08-005 included direction to all PAs regarding Inflation Reduction Act (IRA) tax credits. To the extent that I-REN programs market and promote IRA tax credits, I-REN and its implementers will comply with Commission direction to "collect and maintain documentation showing implementers' involvement in using the Inflation Reduction Act (IRA) tax credits to influence customer adoption, for programs where marketing and promotion of IRA tax credits occurs."<sup>11</sup>

I-REN's portfolio does not include new construction programs and as such is not impacted by D.23-04-035, which eliminated ratepayer-funded incentives for non-exempt and non-cost-effective gas energy efficiency deemed measures in all energy efficiency portfolios for residential and commercial new construction with no existing gas line or with an existing gas line, if gas usage will materially increase. However, I-REN and all other PAs are directed to include a comprehensive strategy for promoting and deploying exempt measures in the equity segment, in 2028 energy efficiency applications to be filed on or before April 1, 2026. Per Commission direction, I-REN will develop the requested strategy including "targeted outreach and engagement and pilots to identify and

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<sup>9</sup> D.21-11-013 Approval of Inland Regional Energy Network Energy Efficiency Business Plan, Ordering Paragraph 5, 34.

<sup>10</sup> D.23-06-055 at 41-42, OP 20.

<sup>11</sup> D.23-08-005 OP 2.

develop solutions for key barriers, needed education and training/workforce readiness and technical assistance, and other relevant elements.”<sup>12</sup>

### Other Portfolio Changes and Considerations

D.21-09-037 established that non-IOU PAs may propose to revise their goals and savings forecast in the true-up or mid-cycle advice letters. With this TUAL submittal I-REN proposes updates to savings forecasted for its NMEC program. Factors impacting the proposed revision are detailed in the IREN-PUBL-002: Public Buildings NMEC Program section below.

In this TUAL submittal I-REN’s budget has been adjusted to incorporate unspent funds from 2022-2023 into program years 2024-2027. I-REN’s portfolio period is unique in that I-REN is funded for 2022-2027, as noted in D.23-06-055.<sup>13</sup> In D.21-05-031, after I-REN’s business plan submittal and prior to its approval, the Commission established a new paradigm that eliminated the annual funding authorization process, instead authorizing a four-year portfolio period in which PAs can consider their budgets to be fungible across the portfolio period.<sup>14</sup> In D.21-11-013 the Commission specifically addressed the unique situation of I-REN’s funding period vis a vis the other PAs and the new guidance in D.21-05-031:

In this case, we are considering the initial I-REN business plan near the end of 2021. Given this timing, it would be unreasonable to require I-REN to file another business plan only a few months later in February 2022 along with the other program administrators, as required by D.21-05-031.

...In addition, we appreciate that I-REN and its local government sponsors have invested significant effort in developing and vetting the business plan proposal before us now, and we therefore intend to consider it fully in this decision. As discussed further below in this decision, we intend to fund a significant effort for I-REN. As with previous REN and non-REN program administrators, it often takes time for new program administrators and programs to ramp up and begin to deliver benefits to customers, and it is only fair to give I-REN

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<sup>12</sup> D.23-04-035 OP 6.

<sup>13</sup> D.23-06-055 at 93, footnote 80: I-REN did not file an application as part of this proceeding because its 2022-2027 budget was already approved in D.21-11-013. I-REN’s budget is included here for completeness only, as I-REN’s total authorized budget cap is \$65,577,932 over the funding period of 2022-2027.

<sup>14</sup> D.21-05-031 at 31.

the opportunity to hit its stride before asking it to make another portfolio filing.

For all of these reasons, we choose Option 2, funding I-REN's efforts through the end of 2027. We also note that the business plans of the other program administrators were originally approved for an eight-year period in 2018, and we are moving toward a four-year portfolio funding approach consistent with D.21-05-031. Therefore, approving I-REN for a six-year period splits the difference and allows for a reasonable transition to the new paradigm, given that I-REN's proposal was filed under the prior rules.<sup>15</sup>

Based on the guidance in D.21-05-031, D.21-11-013, and D.23-06-055, I-REN has adjusted its budget to account for program launch timing and ramp up, by rolling unspent funds from 2022-2023 into 2024-2027.

Along with adjustments due to timing of program launches and ramp up, I-REN's budget has been adjusted to carve out an EM&V allocation specific to CPUC EM&V.

I-REN's budget has also been adjusted in accordance with Commission direction in D.21-05-031 to distinguish between program implementation and portfolio administration costs. In making this adjustment I-REN took into consideration its original bottom-up budget as described in the July 21, 2021 Comments of WRCOG on Behalf of I-REN Responding to Questions in Administrative Law Judge's Ruling Seeking Comment on I-REN Business Plan, the example of similar REN PAs in their strategic business plan and portfolio plan testimony, and the guidance and process documentation prepared by the joint PAs.

Another significant portfolio change relates to guidance in D.23-06-055 that allows PAs to set aside up to 2.5 percent or \$4 million of their energy efficiency budgets to provide an operational complement for integrated demand side management (IDSM) in 2024-2027. I-REN has estimated its IDSM budget based on an initial concept of providing 100 distributed energy resource (DER) audits to local jurisdictions over the next four years, as part of its public sector offerings. As described in Chapter III Section I, I-REN IDSM funds have been allocated from the Public Sector Technical Assistance and Strategic Energy Planning Program direct implementation non-incentive cost category.

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<sup>15</sup> D.21-11-013 at 10-11.

The following sections describe I-REN programs in more detail, including any changes since I-REN's business plan application was filed in February 2021.

### ***IREN-CS-001: C&S Training and Education Program***

I-REN's Codes & Standards (C&S) Training and Education Program launched in spring 2023 and is establishing and implementing trainings tailored to the needs of local AHJs and the building industry to support, understand, and effectively implement energy efficiency codes and standards. The program includes outreach to engage, educate and involve regional construction firms and building departments, and support compliance and enforcement within regional energy efficiency programs and customers. In 2023 I-REN is conducting stakeholder outreach for codes and standards including orientations as mentioned in the portfolio overview. The I-REN C&S team is also conducting surveys of local building officials and private sector building professionals to gather information that will be used to further tailor I-REN C&S offerings to the unique needs of local communities in the remaining months of 2023 as well as 2024 and beyond.

Furthermore, in 2024, I-REN will initiate quarterly regional forums for exchanging ideas and gaining insights on code compliance directly from responsible individuals. These insights will shape training, outreach materials, and enhance relationships between local governments and building industry professionals, fostering regional collaboration and consistency throughout the region. Based on stakeholder feedback gathered at orientations and through surveys, local in-person training opportunities will be expanded in Riverside and San Bernardino counties, enabling contractors to attend trainings more easily. I-REN trainings will also be differentiated by topic, with trainings tailored to the region's climate zones and the needs of the region's local jurisdictions, building department staff, and building professionals.

There have not been changes to the program since the I-REN business plan, other than budget adjustments as described in the portfolio summary. Where feasible, C&S program targets have been forecasted based on implementer experience with similar REN programs across the state. As baseline data is gathered in this first year of operation, targets will continue to be refined.

***IREN-CS-002: C&S Technical Support Program***

I-REN's Codes and Standards (C&S) Technical Support Program is a non-resource program launching in 2023 to develop technical assistance tools and resources to assist building departments and the building industry with understanding, evaluating, and permitting the energy codes to support improved enforcement and compliance. I-REN will develop regionally appropriate model ordinances, vet and refine them with participating local governments, provide ongoing technical assistance for implementation, and deliver updates to reflect the triennial code cycle. Training partners will include colleges, non-profit organizations, community-based organizations, trade organizations, and other regional entities. I-REN will develop and deploy effective survey instruments to gather data and use that data to inform the design of resources to assist building departments and industry professionals.

There have not been changes to the program since the I-REN business plan, other than budget adjustments as described in the portfolio summary. Where feasible, C&S program targets have been forecasted based on implementer experience with similar REN programs across the state. As baseline data is gathered in this first year of operation, targets will continue to be refined.

***IREN-PUBL-001: Technical Assistance and Strategic Energy Planning Program***

I-REN's Technical Assistance and Strategic Energy Planning (TA) Program public sector offerings launched with an implementer in 2023 and the program is ramping up activities for full implementation in 2024. I-REN's TA Program offers customized and objective project management, financial, and engineering services through a concierge-style approach that helps agencies meet their climate, energy, and resiliency goals. Program offerings include customized technical assistance for energy efficiency projects from project identification to completion, funding and financing support, and the development of the Building Upgrade Concierge (BUC) software tool that provides energy consumption portfolio analysis for public agencies. As of the time of this filing, the program is holding orientations across the I-REN region and the BUC software has launched.

As program activities further ramp up in 2024, the program will provide customized support for agencies to identify and implement energy efficiency projects including strategic energy planning and benchmarking. The Program

will guide public agencies through applicable energy programs, including I-REN's Public Buildings NMEC Program, helping build capacity and easing the administrative burden of participation.

There have not been changes to the program since the I-REN business plan, other than budget adjustments as described in the portfolio overview, including the allocation of integrated demand-side management funding as described further in the IDSM subsection under I. Cost Recovery.

### ***IREN-PUBL-002: Public Buildings NMEC Program***

I-REN's Public Buildings Normalized Metered Energy Consumption (NMEC) Program launched in 2023 and is ramping up activities for full implementation in 2024. I-REN's NMEC Program is a resource program that provides incentives for savings based on an NMEC approach, with a special focus on holistic energy projects at critical, cooling, and community resiliency facilities. The objectives of the program are to enable public agencies to leverage an innovative approach that goes beyond code to achieve deep energy savings, and to help local governments afford and finance a range of energy efficiency upgrades.

Incentive design and program targeting approaches are being finalized in Fall 2023. I-REN will leverage its connections with local governments, tribes, and special districts to spread awareness of the program through the I-REN governing agencies' existing marketing channels, local government connections, building industry communication networks, and other channels.

Changes to the program since the I-REN business plan center on updates to savings forecasts and budget. The NMEC program savings forecasts included in I-REN's business plan are updated now that I-REN's implementer is under contract, using a forecasting approach informed by implementer experience as well as results of similar programs in adjacent territories, notably for SoCalREN and SCE. Long equipment lead times, average public agency project timelines, and accounting for program ramp-up resulted in decreased savings forecasts. Limitations on the availability of SCG's gas interval data may also account for a decrease in the savings forecast for gas.

I-REN projects completed in 2024 will be mostly comprised of "quick-win" savings, such as behavioral, retrocommissioning, and operational (BRO)

measures. Savings are expected to see a significant increase by 2025, with subsequent years seeing a steady increase in savings.

Other program changes consist of budget adjustments as described in the portfolio overview, similar to all programs in I-REN's portfolio.

### ***IREN-WET-001: WE&T Training and Education Program***

In its Training and Education Program, currently ramping up for early 2024, I-REN will assess the current training marketplace in the Inland Empire and work with local providers, including higher education providers, high schools, adult schools, professional training companies, and industry experts to tailor content to be relevant to the region's needs and ensure that disadvantaged communities are a focus. I-REN will collaborate with training providers to improve access to a broad spectrum of training opportunities in person, online, and in the field.

There have not been changes to the program since the I-REN business plan, other than budget adjustments as described in the portfolio summary.

### ***IREN-WET-002: WE&T Workforce Development Program***

I-REN will continue to convene and collaborate with state, regional, and local stakeholders, including workforce investment boards (WIBs) and economic development departments to develop a unified mission around the region's energy efficiency workforce, highlighting pathways for job seekers to enter the green jobs market and to increase access for disadvantaged communities. At the time of this submittal, I-REN has convened with 30+ workforce organizations, community-based organizations, nonprofits, trade organization, educational institutions, universities, and the twelve community colleges within the I-REN service territory. I-REN will facilitate identifying opportunities for employers and local workforce partners to network and connect. Since September 2023, I-REN has participated in and/or is scheduled to participate in 13 career and resource fairs within Riverside and San Bernardino counties through October 2023.

Participation includes the outreach and distribution of I-REN fellowship information and other local job pathways resources.

As part of its workforce development offering, I-REN has committed to contracting fellows each year to implement climate action plan-related activities within I-REN cities. In 2023 I-REN has identified host agencies and

potential projects within I-REN member jurisdictions, recruited fellows, and selected and placed fellows in partnership with member jurisdictions to begin work in fall 2023 with additional placements occurring in early 2024 through August 2024. I-REN energy fellows will also support I-REN's equity goals, acting as energy efficiency champions and supporting staff capacity at local agencies to take on public sector energy efficiency projects. As of the time of this submittal I-REN has placed nine fellows at local jurisdictions to assist with energy efficiency projects. I-REN is actively recruiting more fellows and engaging with host cities to offer additional fellowship placements to start January 2024.

There have not been changes to the program since the I-REN business plan, other than budget adjustments as described in the portfolio summary.

## **B. Summary of Forecasted Portfolio Impacts**

CPUC Potential and Goals studies continue to be conducted at the level of IOU service territory and therefore the goals set by the Commission "apply to IOU program administrators and not to non-IOU program administrators" as established in D.21-09-037. For that reason, D.21-09-037 established that non-IOU PAs may propose to revise their goals and savings forecast in the true-up or mid-cycle advice letters. I-REN proposes to update its portfolio goals in accordance with D.21-09-037.

Factors impacting the proposed revisions to I-REN's goals and targets include revisions to budgets, savings forecasts, and changes to avoided cost inputs. D.21-05-031 directed PAs to distinguish between Program Implementation Costs and Portfolio Administration (i.e., Overhead). I-REN's budgets have been adjusted to incorporate this new designation. I-REN's budget has also been adjusted to incorporate unspent funds from 2022-2023, and to carve out funds for IDSM, as described in the Portfolio Summary section.

The NMEC program savings forecasts included in I-REN's business plan are updated now that I-REN's implementer is under contract, using a forecasting approach informed by implementer experience as well as results of similar programs in adjacent territories, notably for SoCalREN and SCE. Long equipment lead times, average public agency project timelines, and accounting for program ramp-up resulted in decreased savings forecasts. Limitations on the availability of SCG's gas interval data may also account for a decrease in the savings forecast for gas. These factors, along with updates to avoided cost

inputs in CEDARS, have resulted in changes to I-REN's savings forecast. Adjusted forecasts were produced using Cost-Effectiveness Tool Avoided Cost Version 2024, Avoided Cost Calculator Vintage 2022/E-5228.

### **True-Up Advice Letter Narrative Tables**

**Table 2.2 - Annual and Cumulative Codes and Standards Savings Forecast**

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

**Table 2.3 - Annual and Cumulative Budget**

Line	Segment	PY 2024	PY 2025	PY 2026	PY 2027	Cumulative
1	Resource Acquisition	\$0	\$0	\$0	\$0	\$0
2	Market Support	\$2,979,532	\$3,299,149	\$3,374,649	\$3,418,519	\$13,071,849
3	Equity	\$6,288,477	\$8,397,047	\$9,292,014	\$10,343,585	\$34,321,123
4	Codes and Standards	\$1,740,936	\$1,826,214	\$1,850,278	\$1,862,863	\$7,280,292
5	EM&V (PA and ED)	\$458,706	\$563,434	\$604,873	\$651,040	\$2,278,053
6	Total Budget w/o OBF Loan Pool	\$11,467,652	\$14,085,844	\$15,121,814	\$16,276,007	\$56,951,316
7	Market Support and Equity, percent of Total Budget w/o OBF Loan Pool					83.2%
8	OBF Loan Pool Addition	\$0	\$0	\$0	\$0	\$0
9	Budget excluding Portfolio Oversight	\$11,467,652	\$14,085,844	\$15,121,814	\$16,276,007	\$56,951,316
10	ED Portfolio Oversight	\$0	\$0	\$0	\$0	\$0
11	Total Portfolio Budget w/ ED Portfolio Oversight	\$11,467,652	\$14,085,844	\$15,121,814	\$16,276,007	\$56,951,316
12	Approved Budget Cap [1]					\$65,577,932

1. D.21-11-013 p.21-22 and OP 2; D.23-06-055 Footnote 80 at p.93.

## IV. Energy Efficiency Portfolio Details

### A. Total System Benefit

I-REN is the only currently authorized energy efficiency PA who did not file a business plan application in 2022, as I-REN had filed its original business plan application in February 2021, prior to the issuance of D.21-05-031. In D.21-05-031, which was issued after I-REN's business plan submittal and prior to its approval, the Commission established a new metric for energy efficiency programs: total system benefit (TSB). Due to the timing of I-REN's business plan application prior to D.21-05-031, I-REN's business plan did not include TSB.

D.21-09-037 established that non-IOU PAs may propose to revise their goals and savings forecast in the true-up or mid-cycle advice letters, because the potential and goals decision does not set goals for non-IOU PAs. As part of the TUAL process, I-REN has adjusted its savings forecast and budget as described in the section on IREN-PUBL-002: Public Buildings NMEC Program, and based on those adjustments has forecasted TSB for 2024-2027 using Cost-Effectiveness Tool Avoided Cost Version 2024, Avoided Cost Calculator Vintage 2022/E-5228.

#### ***Significant portfolio changes contributing to TSB***

Due to the timing of I-REN's Public Buildings NMEC program launch for full implementation in 2024, its previous TSB forecast for 2022-2023 has been adjusted.

### B. Total Resource Cost

In D.16-08-019 the Commission encourages RENs to “manage their programs with an eye toward long-term cost-effectiveness, just as we encourage the other program administrators to do.”<sup>16</sup> However, RENs are not required to meet a cost-effectiveness threshold, as affirmed in D.21-05-031:

Therefore, we will require that all program administrators with energy efficiency resource acquisition programs, excluding RENs whose portfolios have different rules, to show that the resource acquisition segment of their portfolio, with all resource acquisition programs' costs and benefits combined together, is cost-effective on an ex ante basis, with a TRC ratio of at least 1.0 or greater. This

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<sup>16</sup> D.16-08-019 at 12.

requirement applies before (or excluding) consideration of Codes and Standards programs. (p.22)

OP 3. Beginning in program year 2022, energy efficiency program administrators who are investor-owned utilities or community choice aggregators shall ensure that the forecasted benefits exceed the costs of the resource acquisition segments of their portfolios, as measured by the Total Resource Cost test, without considering Codes and Standards programs. (p.81)

### **Significant portfolio changes contributing to TRC**

D.21-09-037 established that non-IOU PAs may propose to revise their goals and savings forecast in the true-up or mid-cycle advice letters, because the potential and goals decision does not set goals for non-IOU PAs. As part of the TUAL process, I-REN has adjusted its savings forecast and budget as described in the section on IREN-PUBL-002: Public Buildings NMEC Program. Those adjustments resulted in decreases to I-REN's TRC forecast.

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

Line			TRC ratio	PAC ratio	RIM ratio
1	Segment	<b>Resource Acquisition</b>	<b>0.00</b>	0.00	0.00
2		Market Support	0.00	0.00	0.00
3		Equity	0.06	0.07	0.07
4		Codes and Standards (C&S)	0.00	0.00	0.00
5	Portfolio	<i>Including C&amp;S</i>	0.04	0.04	0.04
6		<i>Excluding C&amp;S</i>	0.04	0.05	0.05

### **C. Market Support & Equity**

Per D.21-05-031, RENs are exempted from the requirement to limit market support and equity programs to 30% of a PA's portfolio.

RENs, by their nature and primary purposes, are more likely to have a greater share of their portfolio devoted to market support and/or equity programs. Therefore, those portions of their budgets will not be subjected to an up-front limitation.<sup>17</sup>

<sup>17</sup> D.21-05-031 at 23.

***Significant portfolio changes contributing to Market Support & Equity***

As of the time of this TUAL submittal, I-REN has not made any changes to its program segmentation. In D.21-11-013 approving I-REN's energy efficiency business plan, the Commission ordered I-REN to file a Tier 2 advice letter by July 1, 2022, with its portfolio segmentation strategy and metrics.<sup>18</sup> That advice letter is publicly available here: [Advice No. 2-E-G](#) 2022 Metrics and Portfolio Segmentation of I-REN, Pursuant to Decision (D.) 18-05-041, D.21-11-013, and D.21-05-031.

**D. Statewide / Third Party Compliance**

Not applicable to I-REN. I-REN does not offer statewide programs; moreover, statewide allocations established in D.16-08-019 and updated in D.23-06-055 apply to IOUs only. D.16-08-019 OP 10 establishes the definition of third-party programs as follows: To be designated as "third party," the program must be proposed, designed, implemented, and delivered by non-utility personnel under contract to a utility program administrator. By this definition, third-party program compliance requirements do not apply to non-IOU PAs.

***Significant portfolio changes contributing to SW/Third Party Compliance***

Not applicable.

***Solicitations***

Not applicable. At this time, I-REN is not launching new programs that were not included in its Business Plan.

**E. Progress on segment metrics – Introduction to metrics**

D.21-05-031 directed PAs to include in their true-up advice letters "a report on the progress against metrics relevant for each segment of the portfolio."<sup>19</sup> While I-REN's portfolio does not include resource acquisition segment programs, it has provided a report on progress against metrics relevant for equity and market support segment programs below.

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<sup>18</sup> D.21-11-013 Approval of Inland Regional Energy Network Energy Efficiency Business Plan, Ordering Paragraph 5, 34.

<sup>19</sup> D.21-05-031 at 42 – 43.

D.23-06-055 adopted objectives and indicators for the market support and equity segments, and designated how often indicators should be reported (quarterly or annually) and at what level (segment or whole portfolio). However, it deferred reporting and metrics/goal development to a later time.

I-REN has reviewed the indicators and other guidance adopted in D.23-06-055 and has identified a preliminary set of indicators with relevance to its portfolio, shown in tables on the following pages. I-REN has begun developing methodologies for gathering data associated with each indicator, and these methodologies will be refined as I-REN launches its equity and market support programs in 2023 and 2024. Note: indicator wording reflects original CAEECC working group recommendations and may be adjusted as part of the refinement of indicator methodologies based on implications of D.23-06-055.

I-REN will participate in the various stakeholder processes prescribed in D.23-06-055 in the coming months and years, which may include but are not necessarily limited to the following:

- May 1, 2024 advice letter to clarify indicators adopted in D.23-06-055 and identify information that can be used as baselines for future targets or methodologies for how to use indicator information as baselines (D.23-06-055 OP 11).
- August 1, 2024 advice letter regarding plans for awareness, knowledge, attitude, and behavior (AKAB), surveys to inform baselines, PA progress, and setting of targets and goals for the market support segment (D.23-06-055 OP 25).
- September 1, 2025 report regarding preferred approaches to demographic participation data to be proposed in next portfolio proposals due in 2026 (D.23-06-055 OP 23).
- Development of community engagement indicators for equity segment, to include in 2025 Mid Cycle Advice Letter (MCAL) and be reported on in Annual Reports thereafter (D.23-06-055 OP 24).
- March 1, 2025 advice letter regarding study to set goals for the market support and equity segment indicators to begin in 2028 (D.23-06-055 OP 24).
- Continue work on proposed Total Community Benefit metric, as applicable (D.23-06-055 p.71).

**I-REN Equity Segment Indicators Adopted in D.23-06-055**

<b>Index</b>	<b>Metric/ Indicator #</b>	<b>Metric/Indicator Description</b>	<b>Units of Measure</b>	<b>Sector</b>	<b>Participants</b>
Equity_14	A4	Total # equity-targeted public facilities and equipment or community projects served by the Equity programs	Projects	Public Sector (P)	Equity-All Target Participants
Equity_23	A7	Total # of contractors/workers served by Equity Segment Programs	Contractors/Workers	Portfolio Level (PL)- All Sectors	Equity-All Target Participants
Equity_26	B1	Expected first-year bill savings in total \$ for equity-targeted program participants (metric)	Dollars	Portfolio Level (PL)- All Sectors	Equity-All Target Participants
Equity_27	B2	GHG reductions (tons)_EquityAll	Lifecycle GHG reductions (tons) - Net	Portfolio Level (PL)- All Sectors	Equity-All Target Participants
Equity_31	B3	Total kWh savings_EquityAll	Lifecycle ex-ante kWh net	Portfolio Level (PL)- All Sectors	Equity-All Target Participants
Equity_35	B4	Total kW savings_EquityAll	Lifecycle ex-ante kW net	Portfolio Level (PL)- All Sectors	Equity-All Target Participants
Equity_39	B5	Total Therm savings_EquityAll	Lifecycle ex-ante Therm net	Portfolio Level (PL)- All Sectors	Equity-All Target Participants
Equity_46	C1	Energy and climate benefits (monetized within TSB)	Dollars	Portfolio Level (PL)- All Sectors	Equity-All Target Participants

**I-REN Market Support Segment Indicators Adopted in D.23-06-055**

<b>Index #</b>	<b>Metric/ Indicator #</b>	<b>Metric/Indicator Description</b>	<b>Units of Measure</b>	<b>Sector</b>	<b>Participant</b>
301	WET-1	Number of collaborations by Business Plan sector to jointly develop or share training materials or resources.	Count	Workforce Education and Training (WET)	Target Participants
303	WET-2	Percent of participation relative to eligible target population for curriculum	Percentage	Workforce Education and Training (WET)	Target Participants
304	WET-3	Percent of total WE&T training program participants that meet the definition of disadvantaged worker.	Percentage	Workforce Education and Training (WET)	Target Participants
MS_8		Number of Contractors (that serve in PA service territory) with knowledge and trained by relevant MS programs to provide quality installations that optimize EE	Count	Cross-Cutting	Participants of these I-REN Programs: -WE&T Training and Education Program -WE&T Workforce Development Program
MS_18		Assessed value of the partnership by partners	Unknown	Cross-Cutting	Participants of these I-REN Programs: -WE&T Training and Education Program -WE&T Workforce Development Program
MS_19		% of partners that have taken action supporting energy efficiency	Percent	Cross-Cutting	Participants of these I-REN Programs: -WE&T Training and Education Program -WE&T Workforce Development Program

Index #	Metric/ Indicator #	Metric/Indicator Description	Units of Measure	Sector	Participant
MS_20		Number of partners by type and purpose	Count	Cross-Cutting	Participants of these I-REN Programs: -WE&T Training and Education Program -WE&T Workforce Development Program
MS_21		Dollar value of non-ratepayer in kind funds/contributions utilized via partnerships	Dollars	Cross-Cutting	Participants of these I-REN Programs: -WE&T Training and Education Program -WE&T Workforce Development Program

## F. Request to Open / Significantly Change Programs (OPTIONAL)

Not applicable. At this time, I-REN is not launching new programs that were not included in its Business Plan.

## G. Request for Program Closures (OPTIONAL)

Not applicable. At this time, I-REN is not closing any programs.

## H. EM&V

I-REN has not made any changes to its EM&V plans since the submittal of its business plan application. I-REN's EM&V budget has been adjusted to roll over unspent EM&V funds from 2022-2023, and I-REN's overall budget has been adjusted to allocate CPUC EM&V budget in addition to I-REN's PA EM&V budget, increasing the EM&V budget by 344%.

## I. Cost Recovery

**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 & Un-committed Funds for 2024-2027 Offset	(f) Total
1	AL Author PA name - IREN	\$54,673,263	\$0	\$626,464	\$1,651,588	\$0	\$56,951,316
2	REN/CCA – N/A	\$0	\$0	\$0	\$0	\$0	\$0
7	Total	\$54,673,263	\$0	\$626,464	\$1,651,588	\$0	\$56,951,316

### **IDS M Budget**

D.23-06-055 allows PAs to set aside up to 2.5 percent or \$4 million of their energy efficiency budgets to provide an operational complement for integrated demand side management (IDS M) in 2024-2027.

I-REN has estimated its IDS M budget based on an initial concept of providing 100 distributed energy resource (DER) audits to local jurisdictions over the next four years, as part of its public sector offerings. The IDS M budget amounts shown below have been allocated from the Public Sector Technical Assistance and

Strategic Energy Planning Program direct implementation non-incentive cost category.

In its Business Plan I-REN envisioned providing technical assistance support to local jurisdictions in its region through climate resiliency projects such as battery storage systems and microgrids,<sup>20</sup> as well as HVAC upgrades in public buildings delivered through its Normalized Metered Energy Consumption (NMEC) resource offering.<sup>21</sup>

The I-REN programs will be multi-benefit in nature, layering energy efficiency strategies with greenhouse gas reductions, wildfire mitigation, community resilience and climate adaptation measures.<sup>22</sup>

As noted in I-REN's comments on the A.22-02-005 Proposed Decision, the Inland Empire is already home to some of the worst air quality in the state, and the region anticipates increasingly hotter summers and more extreme weather conditions. The capability to layer energy efficiency projects with non-energy efficiency resiliency measures is a vital approach to support safer and healthier spaces for I-REN's community members and achieve California's energy and climate goals.<sup>23</sup>

**Table 1: I-REN IDSM Budget**

Technical Assistance IDSM Budget	2024	2025	2026	2027	Total
<b>DER Audits</b>	15	25	30	30	100
<b>IDSM Budget</b>	\$243,000	\$405,000	\$486,000	\$486,000	\$1,620,000

TA cost/DER audit: \$16,200

#### **J. Misc. / Corrections**

Not applicable.

<sup>20</sup> I-REN Business Plan at 2.16.

<sup>21</sup> I-REN Business Plan at 2.18.

<sup>22</sup> I-REN Business Plan at 2.3.

<sup>23</sup> Comments of Western Riverside Council of Governments (WRCOG) on Behalf of the Inland Regional Energy Network (#246) on the Proposed Decision Authorizing Energy Efficiency Portfolios for 2024-2027 and Business Plans for 2024-2031.

**V. List of Attachments**

Attached hereto are the following:

Attachment A: TUAL Attachment A

Attachment B: CEDARS Confirmation Sheet

**VI. Protest**

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, or November 5, 2023. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

California 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](mailto:EDTariffUnit@cpuc.ca.gov). It is also requested that a copy of the protest be sent by email to the address shown below on the same date it is mailed or delivered to the Commission.

Casey Dailey  
Director of Energy & Environmental Programs  
Western Riverside Council of Governments  
3390 University Ave., Suite 200  
Riverside, California 92501  
Office: (951) 405-6720  
E-mail: [cdailey@wrcog.us](mailto:cdailey@wrcog.us)

**VII. Effective Date**

I-REN requests that this Tier 2 advice filing become effective on regular notice November 15, 2023, which is 30 calendar days from the date of this filing.

**VIII. Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to service lists for R.13-11-005 and A.22-02-005 and uploaded to the CPUC Energy Division Advice Letter database ([cpucadviceletters.org](http://cpucadviceletters.org)). Address changes to the General Order 96-B service list

should be directed to Casey Dailey at [cdailey@wrcog.us](mailto:cdailey@wrcog.us) or by calling (951) 405-6720. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or by electronic mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

Respectfully submitted,

/s/ Dr. Kurt Wilson

Dr. Kurt Wilson  
Executive Director  
Western Riverside Council of  
Governments (WRCOG)  
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Riverside, CA 92501



[iren.gov](http://iren.gov)

Inland Regional Energy Network (I-REN)  
Advice Letter 3-E-G  
2024-2027 Portfolio True-Up Advice Letter  
Attachment A – TUAL Attachment A

We are a network of partners, including the Coachella Valley Association of Governments, the San Bernardino Council of Governments, and the Western Riverside Council of Governments, formed to serve the cities and communities of our region.



General Instructions for Completing the Tables:

All currency will be reported to the dollar, i.e., \$0.  
Refer to instructions tab for guidance or click cell to view details on entry instructions.  
Yellow cells are intended for formulas and must be calculated to unlock as needed.  
Be mindful of print area to ensure formulas are included when added.

Yellow cells are intended and intended for data entry values.

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

Line	Line Item Description	Instructions for Data
1	Residential Sector	Enter residential sector budget by portfolio segment to calculate the cumulative residential sector budget for PY 2024-2027
2	Commercial Sector	Enter commercial sector budget by portfolio segment to calculate the cumulative commercial sector budget for PY 2024-2027
3	Industrial Sector	Enter industrial sector budget by portfolio segment to calculate the cumulative industrial sector budget for PY 2024-2027
4	Agricultural Sector	Enter agricultural sector budget by portfolio segment to calculate the cumulative agricultural sector budget for PY 2024-2027
5	Public Sector	Enter public sector budget by portfolio segment to calculate cumulative public sector budget for PY 2024-2027
6	Cross Cutting Sector	Enter cross cutting sector budget by portfolio segment to calculate cumulative cross cutting sector budget for PY 2024-2027
7	Emerging Tech	Enter emerging technology budget by portfolio segment to calculate the cumulative emerging technology budget for PY 2024-2027
8	WE&T	Enter WE&T budget by portfolio segment to calculate the cumulative WE&T budget for PY 2024-2027
9	Other Sector	Enter other sector budget by portfolio segment to calculate cumulative other sector budget for PY 2024-2027
10	Codes & Standards	Enter codes and standards budget in C&S column to calculate the cumulative Codes & Standards portfolio budget for PY 2024-2027
11	Portfolio Support	Enter portfolio support budget by portfolio segment to calculate the cumulative portfolio support budget for PY 2024-2027
12	Other	Enter other budget for PY 2024-2027
13	Portfolio Subtotal	DO NOT ENTER DATA: formula summing lines 1-12

**Adviser Letter Narrative Table 1.2 - Total Cost Recovery Request, Including REN/CCA and Other Costs**

Line	Line Item Description	Instructions for Data
1	AL Author PA Name	In column "a" PA Program", DO NOT ENTER DATA: Represents the Program Subtotal from Table 1.2.
2	Enter cost recovery by PA	Enter cost recovery by PA from REN/CCA, EM&V ED and EM&V ED.
3	REN/CCA (a) (as applicable)	IOU only: enter budget from REN/CCA
4	REN/CCA (b) (as applicable)	IOU only: enter budget from REN/CCA
5	REN/CCA (c) (as applicable)	IOU only: enter budget from REN/CCA
6	REN/CCA (d) (as applicable)	IOU only: enter budget from REN/CCA
7	Other	DO NOT ENTER DATA: formula summing lines 1-6
8	WE&T	Enter WE&T budget by portfolio segment to calculate the cumulative WE&T budget for PY 2024-2027
9	Other	Enter other budget for PY 2024-2027
10	Codes & Standards	Enter codes and standards budget in C&S column to calculate the cumulative Codes & Standards portfolio budget for PY 2024-2027
11	Portfolio Support	Enter portfolio support budget by portfolio segment to calculate the cumulative portfolio support budget for PY 2024-2027
12	Other	Enter other budget for PY 2024-2027
13	Portfolio Subtotal	DO NOT ENTER DATA: formula summing lines 1-12

**Adviser Letter Narrative Table 2.1 - Annual and Cumulative Total System Benefit Forecast**

Line	Line Item Description	Instructions for Data
1	PA Programs	Enter cost recovery by PA
2	Energy Division Oversight	Enter cost recovery by Energy Division Oversight as approved in D.23-06-055
3	EM&V PA	Represents cost recovery for EM&V PA budget, excluding cost recovery for Energy Division EM&V
4	EM&V ED	DO NOT ENTER DATA: formula summing lines 1-3
5	Albuquerque & Uncommitted Funds for 2024-2027 Offset	Enter cost recovery for EM&V PA and REN/CCA as REN/CCA do not receive invoices for EM&V from Energy Division
6	Total	DO NOT ENTER DATA: formula summing lines 1-5

**Adviser Letter Narrative Table 2.2 - Annual and Cumulative Codes and Standards Sylevel Forecast**

Line	Line Item Description	Instructions for Data
1	Resource Acquisition	Enter annual Total System Benefit Forecast for Resource Acquisition segment to calculate cumulative total
2	EM&V PA	Enter annual Total System Benefit Forecast for Energy Division EM&V segment to calculate cumulative total
3	Equity	DO NOT ENTER DATA: formula summing lines 1-3
4	Total Forecast	Enter annual Total System Benefit Forecast for Equity segment to calculate cumulative total
5	TSB Forecast	Enter annual Total System Benefit Forecast for TSB segment to calculate cumulative total
6	TSB Forecast / TSB Total	DO NOT ENTER DATA: formula calculating percentage of segment as compared to TSB Forecast as adopted in D.23-08-012

**Adviser Letter Narrative Table 2.3 - Annual and Cumulative Budget**

Line	Line Item Description	Instructions for Data
1	Resource Acquisition	Enter annual budget for Resource Acquisition segment to calculate cumulative total
2	EM&V PA	Enter annual budget for EM&V PA segment to calculate cumulative total
3	Equity	DO NOT ENTER DATA: formula summing lines 1-3
4	Total Forecast	Enter annual Total System Benefit Forecast for Equity segment to calculate cumulative total
5	TSB Forecast	Enter annual Total System Benefit Forecast for TSB segment to calculate cumulative total
6	TSB Forecast / TSB Total	DO NOT ENTER DATA: formula calculating percentage of segment as compared to TSB Forecast as adopted in D.23-08-012

**Adviser Letter Narrative Table 3 - Portfolio Cost Effectiveness Ratios (PY 2024-2027)**

Line	Line Item Description	Instructions for Data
1	Program	Enter cost effectiveness ratios for 2024-2027
2	GW&CPC Goal	GW&CPC Goal as adopted in D.23-08-012
3	GW&CPC Forecast/Goal	Cumulative GW Forecast/Goal for 2024-2027
4	MW CPC Goal	MW CPC Goal as adopted in D.23-08-012
5	MW CPC Forecast	Cumulative MW Forecast/Goal for 2024-2027
6	MW CPC Forecast/Goal	MWThn CPC Forecast/Goal for 2024-2027
7	MWThn CPC Goal	MWThn CPC Goal as adopted in D.23-08-012
8	MWThn Forecast/Goal	MWThn MW Forecast/Goal for 2024-2027

**Adviser Letter Narrative Table 4 - Portfolio Statewide and Third-party Contribution Percentage Requirements (IOU only)**

Line	Line Item Description	Instructions for Data
1	Statewide	Enter cumulative statewide program budget, including program support PA costs.
2	Third-party	Enter the cumulative statewide program budget, including program support PA costs.

**Appendix 1 - 2024-2027 Program Portfolio Budget and Targets**

Line	Line Item Description	Instructions for Data
1	Program	Enter Program ID as listed in the CEDARS Program Table
2	Program Name	Enter Program Name as listed in the CEDARS Program Table
3	Target Exempt	Enter "Yes" for Non-Resource Programs and "No" for Resource Programs, as defined by the EE Policy Manual Version 5.
4	Segment - Market Support	Enter TBC, PAC, and RIM benefit/cost ratios for the Market Support segment on a cumulative (4-year) basis.
5	Segment - Equity	Enter annual budget for Equity segment to calculate cumulative total
6	Segment - C&S	Enter annual budget for Codes & Standards segment to calculate cumulative total
7	Segment - Codes & Standards	Enter annual budget for Codes & Standards segment to calculate cumulative total
8	Segment - Other	DO NOT ENTER DATA: formula summing lines 1-7
9	Market Support and Equity, percent of Total Budget w/o O&B Loan Pool	DO NOT ENTER DATA: formula calculating cumulative segment budget as a percent of total cumulative portfolio budget excluding O&B loan addition
10	O&B Loan Pool Addition	Enter annual budget for O&B loan addition to calculate cumulative total
11	Other Portfolio Oversight	DO NOT ENTER DATA: formula summing lines 9 and 10
12	ED Portfolio Oversight	Enter annual budget for ED Portfolio Oversight per allocations from D.23-08-050
13	Total Portfolio Budget w/o ED Portfolio Oversight	DO NOT ENTER DATA: formula summing lines 9 and 10
14	Total Portfolio Budget	Enter 2024-2027 authorized budget cap from Table 7, D.23-08-012.

**Adviser Letter Narrative Table 4 - Portfolio Statewide and Third-party Contribution Percentage Requirements (IOU only)**

Line	Line Item Description	Instructions for Data
1	Statewide	Enter cumulative statewide program budget, including program support PA costs.
2	Third-party	Enter the cumulative statewide program budget, including program support PA costs.

**Appendix 1 - 2024-2027 Program Portfolio Budget and Targets**

Line	Line Item Description	Instructions for Data
1	Program	Enter Program ID as listed in the CEDARS Program Table
2	Program Name	Enter Program Name as listed in the CEDARS Program Table
3	Target Exempt	Enter "Yes" for Non-Resource Programs and "No" for Resource Programs, as defined by the EE Policy Manual Version 5.
4	Segment - Market Support	Enter TBC, PAC, and RIM benefit/cost ratios for the Market Support segment on a cumulative (4-year) basis.
5	Segment - Equity	Enter annual budget for Equity segment to calculate cumulative total
6	Segment - C&S	Enter annual budget for Codes & Standards segment to calculate cumulative total
7	Segment - Codes & Standards	Enter annual budget for Codes & Standards segment to calculate cumulative total
8	Segment - Other	DO NOT ENTER DATA: formula summing lines 1-7
9	Market Support and Equity, percent of Total Budget w/o O&B Loan Pool	DO NOT ENTER DATA: formula calculating cumulative segment budget as a percent of total cumulative portfolio budget excluding O&B loan addition
10	O&B Loan Pool Addition	Enter annual budget for O&B loan addition to calculate cumulative total
11	Other Portfolio Oversight	DO NOT ENTER DATA: formula summing lines 9 and 10
12	Total Portfolio Budget	Enter 2024-2027 authorized budget cap from Table 7, D.23-08-012.

**Appendix 2 - Energy Efficiency Total/Other Gap And Target Expenditure Projections (Cumulative for PY 2024-2027)**

Line	Line Item Description	Instructions for Data
1	Administrative Costs	DO NOT ENTER DATA: header row
2	PA	Enter non-third party qualifying and third party qualifying portions of the cumulative PA program administrative budget, per EE Policy Manual cost category definition, including target exemption program and non-third party or partnership administrative costs. 10% cap requirement based on D.09-09-047 is set for IOU only
3	ED	Enter cumulative program total system benefit budget (ED) and target exemption program and third party qualifying portions of the cumulative ED program benefit budget, per EE Policy Manual cost category definition
4	Marketing & Outreach	Enter cumulative program total system benefit budget (Marketing & Outreach) and target exemption program and third party qualifying portions of the cumulative Marketing & Outreach budget, per EE Policy Manual cost category definition
5	Other	DO NOT ENTER DATA: formula summing lines 2-4
6	Incentives and Rebates	Enter non-third party qualifying and third party qualifying portions of cumulative incentives and rebates budget, per EE Policy Manual cost category definition, including target exemption program
7	Non-Incentives and Non Rebates	Enter non-third party qualifying and third party qualifying portions of cumulative non-incentive and non-rebate budget, per EE Policy Manual cost category definition, including target exemption program
8	Target Exempt (Non Incentives and Non Rebates)	Enter cumulative target exemption program direct implementation non-incentive budget, per EE Policy Manual cost category definition, including target exemption program
9	Marketing & Outreach Costs	Enter cumulative Marketing & Outreach budget (PA and ED) and target exemption Marketing & Outreach budget, per EE Policy Manual cost category definition
10	Other Third-Party Qualifying Costs	Enter cumulative other third party qualifying costs (PA and ED) and target exemption other third party qualifying costs, per EE Policy Manual cost category definition
11	ED Portfolio Oversight	Enter cumulative ED portfolio oversight budget for IOU only (IOU only excludes REN/CCA portions of EM&V ED budget since 4% EM&V budget cap applies to each PA portfolio budget)
12	EE-Funded O&B	Enter cumulative EE-Funded O&B budget for IOU only (IOU only excludes REN/CCA portions of EM&V ED budget since 4% EM&V budget cap applies to each PA portfolio budget)
13	EE Spending Budget Request	DO NOT ENTER DATA: formula summing lines 1-12
14	EE Spending Budget Request (excluding O&B Portfolio Oversight)	DO NOT ENTER DATA: formula summing lines 1-12
15	EE Spending Budget Request (excluding O&B Loan Pool)	Enter IOU PA percentage for Third-Party Implementer Contracts used as its denominator the PA's Spending Budget Request (PA Program and EM&V, excluding REN, CCA, and O&B Loan Pool). This is the Total in line 15 minus Portfolio O&B Loan Pool. (IOU) Third-Party Implementer Contracts (as defined per D.16-08-029, OP 10) includes third-party contract and incentive budgets and statewide qualifying contract and incentive budgets.
16	ED - Portfolio Oversight	Enter IOU SW's share of \$1M annual ED Portfolio Oversight Group budget per OP9 from D.23-06-055. "Commission staff require additional consulting and technical support resources in order to perform adequate portfolio oversight. \$1 million annually in reimbursable funding from IOUs should be made available to Commission staff for this purpose."
17	EE-Funded O&B	Enter cumulative EE-Funded O&B budget for IOU only (IOU only excludes REN/CCA portions of EM&V ED budget since 4% EM&V budget cap applies to each PA portfolio budget)
18	EE Spending Budget Request	DO NOT ENTER DATA: formula summing lines 15 and 16

**Column**

**Column Description**

**Instructions for Data**

**a**

**Non-Third Party Qualifying Costs**

**b**

**Third Party Qualifying Costs**

**c**

**Cap**

**Percent of Budget**

**Cap Percentage**

**Target**

Appendix 1 - 2024 - 2027 Program Portfolio Budget and Targets

(a) Program ID	(b) Program Name	(c) Target Exempt	(d) Program Type	(e) Business Sector	(f) Portfolio Segment	(g) Budget	(h) TSB	(i) kWh	(j) kW	(k) Thm	(l) Change Notes
IREN-PUBL-001	Technical Assistance and Strategic Energy	Yes	Core PA	Public	Equity	\$ 12,422,776	\$ -	\$ -	\$ -	\$ -	
IREN-PUBL-002	Public Buildings NMEC Program	No	Core PA	Public	Equity	\$ 18,533,739	\$ 2,442,661	4,075,500	308	6,161	Due to the timing of I-REN's business plan application prior to D.21-05-031, I-REN's business plan did not include TSB. 2022/E-5228 ACC Vintage used for IREN TSB and Forecasts in TUAL.
IREN-CS-001	C&S Training and Education Program	Yes	Core PA	Codes and Standards	Codes and Standards	\$ 4,153,930	\$ -	-	-	-	
IREN-CS-002	Technical Support Program	Yes	Core PA	Codes and Standards	Codes and Standards	\$ 2,750,914	\$ -	-	-	-	
IREN-WET-001	WE&T Training and Education Program	Yes	Core PA	Workforce Education	Market Support	\$ 5,159,835	\$ -	-	-	-	
IREN-WET-002	Workforce Development Program	Yes	Core PA	Workforce Education	Market Support	\$ 7,239,629	\$ -	-	-	-	
IREN-EMV-001	IREN EM&V	Yes	Core PA	Evaluation, Measurement	Evaluation, Measurement	\$ 2,278,053	\$ -	-	-	-	EM&V budget increased by 344% since last filing due to addition of CPUC EM&V.
IREN-IDSM-Equity-001	IDSM - Equity	Yes	Core PA	Public	Equity	\$ 1,620,000	\$ -	-	-	-	Added per D. 23-06-055
IREN-Equity-PortfolioSupport	Equity Portfolio Support PA Costs	Yes	Core PA	Public	Equity	\$ 1,744,607	\$ -	-	-	-	Added per D. 21-05-031 and PA Guidance Documents
IREN-MS-PortfolioSupport	Market Support Portfolio Support PA Costs	Yes	Core PA	Workforce Education	Market Support	\$ 672,385	\$ -	-	-	-	Added per D. 21-05-031 and PA Guidance Documents
IREN-CS-PortfolioSupport	Codes & Standards Portfolio Support PA C	Yes	Core PA	Codes and Standards	Codes and Standards	\$ 375,448	\$ -	-	-	-	Added per D. 21-05-031 and PA Guidance Documents
<b>Total</b>						<b>\$ 56,951,316</b>	<b>\$ 2,442,661.00</b>	<b>4,075,500</b>	<b>308</b>	<b>6,161</b>	

TSB and Budget values that have changed more than 25% are flagged in red (decrease) or green (increase). See Change Notes for details.

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	\$0	\$0	\$0	\$0	\$0
2	Commercial Sector	\$0	\$0	\$0	\$0	\$0
3	Industrial Sector	\$0	\$0	\$0	\$0	\$0
4	Agricultural Sector	\$0	\$0	\$0	\$0	\$0
5	Public Sector	\$0	\$0	\$34,321,123	\$0	\$34,321,123
6	Cross Cutting Sector					
7	Emerging Tech	\$0	\$0	\$0	\$0	\$0
8	WE&T	\$0	\$13,071,849	\$0	\$0	\$13,071,849
9	Finance	\$0	\$0	\$0	\$0	\$0
10	Codes & Standards	\$0	\$0	\$0	\$7,280,292	\$7,280,292
11	Portfolio Support	\$0	\$0	\$0	\$0	\$0
12	OBF Loan Pool					\$0
13	<b>Portfolio Subtotal [1]</b>	<b>\$0</b>	<b>\$13,071,849</b>	<b>\$34,321,123</b>	<b>\$7,280,292</b>	<b>\$54,673,263</b>

[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 - <b>IREN</b>	<b>\$54,673,263</b>	\$0	\$626,464	\$1,651,588	\$0	<b>\$56,951,316</b>
2	REN/CCA 1 (as applicable) - <i>insert name here</i>	\$0	\$0	\$0	\$0	\$0	\$0
3	REN/CCA 2 (as applicable) - <i>insert name here</i>	\$0	\$0	\$0	\$0	\$0	\$0
4	REN/CCA 3 (as applicable) - <i>insert name here</i>	\$0	\$0	\$0	\$0	\$0	\$0
5	REN/CCA 4 (as applicable) - <i>insert name here</i>	\$0	\$0	\$0	\$0	\$0	\$0
6	REN/CCA 5 (as applicable) - <i>insert name here</i>	\$0	\$0	\$0	\$0	\$0	\$0
7	<b>Total</b>	<b>\$54,673,263</b>	<b>\$0</b>	<b>\$626,464</b>	<b>\$1,651,588</b>	<b>\$0</b>	<b>\$56,951,316</b>

Table 2.1 - Annual and Cumulative Total System Benefit Forecast

Line	Segment	PY 2024	PY 2025	PY 2026	PY 2027	Cumulative
1	Resource Acquisition	\$0	\$0	\$0	\$0	<b>\$0</b>
2	Market Support	\$0	\$0	\$0	\$0	<b>\$0</b>
3	Equity	\$172,737	\$572,750	\$741,243	\$955,931	<b>\$2,442,661</b>
4	<b>Total TSB Forecast</b>	<b>\$172,737</b>	<b>\$572,750</b>	<b>\$741,243</b>	<b>\$955,931</b>	<b>\$2,442,661</b>
5	CPUC TSB Goal	\$0	\$0	\$0	\$0	\$0
6	<i>TSB Forecast / TSB Goal</i>	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!

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	<b>0.0</b>
2	GWh CPUC Goal [1]	0	0	0	0	0.0
3	<i>GWh Forecast/Goal</i>	-	-	-	-	-
4	MW Forecast	0	0	0	0	<b>0.0</b>
5	MW CPUC Goal [1]	0	0	0	0	0.0
6	<i>MW Forecast/Goal</i>	-	-	-	-	-
7	MMThm Forecast	0	0	0	0	<b>0.0</b>
8	MMThm CPUC Goal [1]	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	\$0	\$0	\$0	\$0	\$0
2	Market Support	\$2,979,532	\$3,299,149	\$3,374,649	\$3,418,519	\$13,071,849
3	Equity	\$6,288,477	\$8,397,047	\$9,292,014	\$10,343,585	\$34,321,123
4	Codes and Standards	\$1,740,936	\$1,826,214	\$1,850,278	\$1,862,863	\$7,280,292
5	EM&V (PA and ED)	\$458,706	\$563,434	\$604,873	\$651,040	\$2,278,053
6	<b>Total Budget w/o OBF Loan Pool</b>	<b>\$11,467,652</b>	<b>\$14,085,844</b>	<b>\$15,121,814</b>	<b>\$16,276,007</b>	<b>\$56,951,316</b>
7	Market Support and Equity, percent of Total Budget w/o OBF Loan Pool					83.2%
8	OBF Loan Pool Addition	\$0	\$0	\$0	\$0	\$0
9	<b>Budget excluding Portfolio Oversight</b>	<b>\$11,467,652</b>	<b>\$14,085,844</b>	<b>\$15,121,814</b>	<b>\$16,276,007</b>	<b>\$56,951,316</b>
10	ED Portfolio Oversight	\$0	\$0	\$0	\$0	\$0
11	<b>Total Portfolio Budget w/ ED Portfolio Oversight</b>	<b>\$11,467,652</b>	<b>\$14,085,844</b>	<b>\$15,121,814</b>	<b>\$16,276,007</b>	<b>\$56,951,316</b>
12	<b>Approved Budget Cap [1]</b>					<b>\$65,577,932</b>

1. D.21-11-013 p.21-22 and OP 2; D.23-06-055 Footnote 80 at p.93.

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

Line			TRC ratio	PAC ratio	RIM ratio
1	Segment	<b>Resource Acquisition</b>	<b>0.00</b>	0.00	0.00
2		Market Support	0.00	0.00	0.00
3		Equity	0.06	0.07	0.07
4		Codes and Standards (C&S)	0.00	0.00	0.00
5	Portfolio	<i>Including C&amp;S</i>	0.04	0.04	0.04
6		<i>Excluding C&amp;S</i>	0.04	0.05	0.05

**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	\$56,951,316	0.0%	20%
2	Third-party [2]	\$0	\$56,951,316	0.0%	60%

1 SW program definition per XYZ (+other references as needed), +minimum threshold reference to application decision.

2 Third party program definition per D.16-08-019, OP 10 (+other references as needed), +minimum threshold reference (vary by IOU)

Appendix 2 - Energy Efficiency Cap And Target Expenditure Projections (Cumulative for PY 2024-2027)

Line	Budget Category	Expenditures			Cap & Target Performance		
		(a) Non-Third Party Qualifying Costs	(b) Third Party Qualifying Costs	(c) Total Portfolio	(d) Percent of Budget <sup>[6]</sup>	(e) Cap Percentage	(f) Target %
1	<b>Administrative Costs</b>						
2	PA <sup>[1]</sup>	\$ 4,654,067		\$ 4,654,067	8.2%	10.0%	
3	Non-PA Third Party & Partnership <sup>[2]</sup>	\$ -	\$ -	\$ -	0.0%		10.0%
4	PA & Non-PA Target Exempt Programs <sup>[3]</sup>	\$ -	\$ -	\$ -			
5	<b>Marketing and Outreach Costs</b>						
6	Marketing & Outreach	\$ 2,795,584	\$ -	\$ 2,795,584	4.9%		6.0%
7	<b>Direct Implementation Costs</b>						
8	Incentives and Rebates	\$ 10,750,000	\$ -	\$ 10,750,000			
9	Non Incentives and Non Rebates	\$ 36,473,612	\$ -	\$ 36,473,612	64.0%		20.0%
10	Target Exempt (Non Incentives and Non Rebates)	\$ -	\$ -	\$ -			
11	<b>EM&amp;V Costs (PA and ED) <sup>[4]</sup></b>	\$ 2,278,053	\$ -	\$ 2,278,053	4.0%	4.0%	
11a	EM&V - PA	\$ 626,464		\$ 626,464			
11b	EM&V - ED	\$ 1,651,588		\$ 1,651,588			
12	<b>PA Spending Budget Request (excluding OBF Loan Pool Additions and excluding ED Portfolio Oversight)</b>	\$ 56,951,316	\$ -	\$ 56,951,316			
13	<b>Total Third-Party Qualifying Costs <sup>[5]</sup></b>		\$ -		0.0%		60.0%
14	<b>OBF Loan Pool Addition</b>	\$ -		\$ -			
15	<b>PA Spending Budget Request (excluding ED Portfolio Oversight)</b>			\$ 56,951,316			
16	<b>ED Portfolio Oversight</b>	\$ -		\$ -			
17	<b>EE-Funded IDSM<sup>[7]</sup></b>	\$ 1,620,000				2.5%	
18	<b>PA Spending Budget Request</b>			\$ 56,951,316			

[1] 10% cap requirement based on D. 09-09-047 for IOU only

[2] New Third party program definition per D.16-08-019, OP 10. For Row 3 of this table, the "Third Party & Partnership" administrative costs under the "Non-Third Party Qualifying Costs" column are costs for programs that met the old Third Party definition prior to the transition to the new third party definition.

[3] Target Exempt Programs include: Emerging Technologies, Workforce Education & Training, Strategic Energy Resources (SER) program, 3P Placeholder for Public LGPs, and Codes & Standards programs (excluding Building Codes Advocacy, Appliance Standards Advocacy and National Standards Advocacy).

[4] For IOUs, EM&V costs only includes IOU's Total EM&V budget (PA + ED) and does not include REN or CCAs EM&V budget. For RENs & CCAs, include EM&V-PA Budget and EM&V-ED = \$0 . The EM&V percentage is based on PA's total portfolio budget (from line 13) RENs, and CCAs

[5] IOU's Third-Party Implementer Contracts (as defined per D.16-08-019, OP 10) includes third-party contract and incentive budgets and statewide qualifying contract and incentive budgets. Calculation of (d) Percent of Budget for Third-Party Implementer Contracts uses \$56,951,316 as its denominator.

[6] With the exception of Third Party Implementer Contracts as noted in footnote [5], calculation of (d) Percent of Budget uses \$56,951,316 as the denominator; equal to line 15 PA Budget Spending Request.

[7] D.23-06-055 OP 29: Portfolio administrators (PAs) may set aside up to 2.5 percent, or \$4 million, whichever is greater, up to a maximum of \$15 million, from within their total budgets during 2024-2027 approved in this decision to fund innovative integrated demand-side management projects, including ongoing load-shifting that is not event-based. Energy efficiency funding shall not be used for rebating capital costs of non-efficiency technologies, except as already provided for electric panel upgrades in Decisions 19-08-009 and 23-04-035.



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Inland Regional Energy Network (I-REN)  
Advice Letter 3-E-G  
2024-2027 Portfolio True-Up Advice Letter  
Attachment B – CEDARS Confirmation Sheet

We are a network of partners, including the Coachella Valley Association of Governments, the San Bernardino Council of Governments, and the Western Riverside Council of Governments, formed to serve the cities and communities of our region.



## CEDARS FILING SUBMISSION RECEIPT

The IREN portfolio budget filing has been submitted and is now under review. A summary of the budget filing is provided below.

PA: Inland Regional Energy Network (IREN)

Budget Filing Year: 2024

Submitted: 19:35:50 on 16 Oct 2023

By: Casey Connorton

Advice Letter Number: 3-E-G

\* Portfolio Budget Filing Summary \*

- TRC: 0.01
- PAC: 0.02
- TRC (no admin): 0.12
- PAC (no admin): 0.24
- RIM: 0.02
- Budget: \$11,467,651.79
- TotalSystemBenefit: \$172,736.89
- ElecBen: \$166,266.71
- GasBen: \$6,470.19
- OtherBen: \$0.00
- TRCCost: \$12,211,818.29
- PACCost: \$11,426,160.63

\* Programs Included in the Budget Filing \*

- IREN-CS-001: C&S; Training and Education Program
- IREN-CS-002: C&S; Technical Support Program
- IREN-CS-PortfolioSupport: PORTFOLIO ADMIN-CODES & STANDARDS
- IREN-EMV-001: IREN EM&V;
- IREN-Equity-PortfolioSupport: PORTFOLIO ADMIN-EQUITY
- IREN-IDSM-Equity-001: Equity IDSM
- IREN-MS-PortfolioSupport: PORTFOLIO ADMIN-MARKET SUPPORT
- IREN-PUBL-001: Technical Assistance and Strategic Energy Planning Program
- IREN-PUBL-002: Public Buildings NMEC Program
- IREN-WET-001: WE&T; Training and Education Program
- IREN-WET-002: WE&T; Workforce Development Program

## CEDARS FILING SUBMISSION RECEIPT

The IREN portfolio budget filing has been submitted and is now under review. A summary of the budget filing is provided below.

PA: Inland Regional Energy Network (IREN)

Budget Filing Year: 2025

Submitted: 19:36:56 on 16 Oct 2023

By: Casey Connorton

Advice Letter Number: 3-E-G

\* Portfolio Budget Filing Summary \*

- TRC: 0.04
- PAC: 0.04
- TRC (no admin): 0.12
- PAC (no admin): 0.24
- RIM: 0.04
- Budget: \$14,085,843.47
- TotalSystemBenefit: \$572,749.57
- ElecBen: \$552,203.20
- GasBen: \$20,546.37
- OtherBen: \$0.00
- TRCCost: \$16,264,891.58
- PACCost: \$13,947,401.15

\* Programs Included in the Budget Filing \*

- IREN-CS-001: C&S; Training and Education Program
- IREN-CS-002: C&S; Technical Support Program
- IREN-CS-PortfolioSupport: PORTFOLIO ADMIN-CODES & STANDARDS
- IREN-EMV-001: IREN EM&V;
- IREN-Equity-PortfolioSupport: PORTFOLIO ADMIN-EQUITY
- IREN-IDSM-Equity-001: Equity IDSM
- IREN-MS-PortfolioSupport: PORTFOLIO ADMIN-MARKET SUPPORT
- IREN-PUBL-001: Technical Assistance and Strategic Energy Planning Program
- IREN-PUBL-002: Public Buildings NMEC Program
- IREN-WET-001: WE&T; Training and Education Program
- IREN-WET-002: WE&T; Workforce Development Program

## CEDARS FILING SUBMISSION RECEIPT

The IREN portfolio budget filing has been submitted and is now under review. A summary of the budget filing is provided below.

PA: Inland Regional Energy Network (IREN)

Budget Filing Year: 2026

Submitted: 19:37:53 on 16 Oct 2023

By: Casey Connorton

Advice Letter Number: 3-E-G

### \* Portfolio Budget Filing Summary \*

- TRC: 0.04
- PAC: 0.05
- TRC (no admin): 0.12
- PAC (no admin): 0.24
- RIM: 0.05
- Budget: \$15,121,813.84
- TotalSystemBenefit: \$741,242.97
- ElecBen: \$712,966.49
- GasBen: \$28,276.49
- OtherBen: \$0.00
- TRCCost: \$18,042,288.09
- PACCost: \$14,941,838.83

### \* Programs Included in the Budget Filing \*

- IREN-CS-001: C&S; Training and Education Program
- IREN-CS-002: C&S; Technical Support Program
- IREN-CS-PortfolioSupport: PORTFOLIO ADMIN-CODES & STANDARDS
- IREN-EMV-001: IREN EM&V;
- IREN-Equity-PortfolioSupport: PORTFOLIO ADMIN-EQUITY
- IREN-IDSM-Equity-001: Equity IDSM
- IREN-MS-PortfolioSupport: PORTFOLIO ADMIN-MARKET SUPPORT
- IREN-PUBL-001: Technical Assistance and Strategic Energy Planning Program
- IREN-PUBL-002: Public Buildings NMEC Program
- IREN-WET-001: WE&T; Training and Education Program
- IREN-WET-002: WE&T; Workforce Development Program

## CEDARS FILING SUBMISSION RECEIPT

The IREN portfolio budget filing has been submitted and is now under review. A summary of the budget filing is provided below.

PA: Inland Regional Energy Network (IREN)

Budget Filing Year: 2027

Submitted: 19:39:58 on 16 Oct 2023

By: Casey Connorton

Advice Letter Number: 3-E-G

\* Portfolio Budget Filing Summary \*

- TRC: 0.05
- PAC: 0.06
- TRC (no admin): 0.12
- PAC (no admin): 0.24
- RIM: 0.06
- Budget: \$16,276,006.99
- TotalSystemBenefit: \$955,930.56
- ElecBen: \$917,011.34
- GasBen: \$38,919.22
- OtherBen: \$0.00
- TRCCost: \$20,011,809.76
- PACCost: \$16,042,039.47

\* Programs Included in the Budget Filing \*

- IREN-CS-001: C&S; Training and Education Program
- IREN-CS-002: C&S; Technical Support Program
- IREN-CS-PortfolioSupport: PORTFOLIO ADMIN-CODES & STANDARDS
- IREN-EMV-001: IREN EM&V;
- IREN-Equity-PortfolioSupport: PORTFOLIO ADMIN-EQUITY
- IREN-IDSM-Equity-001: Equity IDSM
- IREN-MS-PortfolioSupport: PORTFOLIO ADMIN-MARKET SUPPORT
- IREN-PUBL-001: Technical Assistance and Strategic Energy Planning Program
- IREN-PUBL-002: Public Buildings NMEC Program
- IREN-WET-001: WE&T; Training and Education Program
- IREN-WET-002: WE&T; Workforce Development Program