FILED
04/16/19
04:59 PM

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Concerning Energy Efficiency Rolling Portfolios, Policies, Programs, Evaluation and Related Issues.	Rulemaking 13-11-005 (Filed November 14, 2013)

OPENING COMMENTS OF THE WESTERN RIVERSIDE COUNCIL OF GOVERNMENTS (WRCOG) ON BEHALF OF THE INLAND REGIONAL ENERGY NETWORK ON ADMINSTRATIVE LAW JUDGE'S RULING SEEKING COMMENT ON FUTURE OF REGIONAL ENERGY NETWORKS

Casey Dailey
Director of Energy & Environmental Programs
Western Riverside Council of Governments
3390 University Ave., #450
Riverside, California 92501
Telephone: (951) 405-6720
E-mail: cdailey@wrcog.us

For the Inland Regional Energy Network
Western Riverside Council of Governments (WRCOG), Coachella Valley Association of Governments (CVAG), and San Bernardino Council of Governments (SBCOG)

Dated: April 16, 2019 in Riverside, California

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Concerning Energy Efficiency Rolling Portfolios, Policies, Programs, Evaluation and Related Issues.	Rulemaking 13-11-005 (Filed November 14, 2013)

OPENING COMMENTS OF THE WESTERN RIVERSIDE COUNCIL OF GOVERNMENTS (WRCOG) ON BEHALF OF THE INLAND REGIONAL ENERGY NETWORK ON ADMINSTRATIVE LAW JUDGE'S RULING SEEKING COMMENT ON FUTURE OF REGIONAL ENERGY NETWORKS

I. Introduction

In accordance with Rule 6.2 of the California Public Utilities Commission ("Commission") Rules of Practice and Procedure ("Rules"), the Western Riverside Council of Governments (WRCOG) submits comments to Administrative Law Judge's (ALJ's) Ruling Seeking Comment on Future of Regional Energy Networks (Ruling), issued on March 27, 2019, requesting initial comments on policy regarding regional energy networks (RENs), the WRCOG on behalf of the Inland Regional Energy Network (I-REN) comprised of Western Riverside Council of Governments (WRCOG), Coachella Valley Association of Governments (CVAG), and San Bernardino Council of Governments (SBCOG), respectfully submits these Comments. Additionally, per these comments, WRCOG filed for Motion for Party Status and was served on 4/9/19. The documents that were submitted for party status included the Motion for Party and Certificate of Service.

Our vision is to expand our collective ability to administer and design energy efficiency programs and support through various avenues, including identifying and filling gaps in energy efficiency programs, addressing the needs of underserved customers, and ensuring affordable access to energy efficiency programs across the region. Further, we see the opportunity to leverage other efforts within our three areas with these additional and complementary programs.

WRCOG currently operates one of the Local Government Partnerships (LGPs) within the state and has seen success over the years through the support the Partnership has provided to its members in the areas of energy efficiency retrofit projects as well as educating our members' constituents on best practices to help both residential and commercial customers. Since its inception in 2010, the Partnership has achieved savings of over 16 million kWh and over 9,000 therms.

The questions posed in the Administrative Law Judge's Ruling Seeking Comment on Future of Regional Energy Networks directly impacts our vision and goal to become a REN, and our ability to provide equitable energy efficiency services to our constituents. It is our contention that these constituents have been historically and continue to be underserved by utility programs, leaving a broad spectrum of our communities without access to ratepayer funded programs.

In D.12-11-015, the Commission granted the LGSEC's motion to establish local governments as viable and needed program administrators, approving the first RENs, noting that "[t]he REN concept invitation by the Commission represents the culmination of a number of events over the past several years, including provision of federal American Recovery and

Reinvestment Act (ARRA) funding for EE purposes to local governments, which built local capacity, as well as several years of hearing increasingly vocal complaints from local governments that utility LGP approaches were not meeting their needs.”[1] The proposed I-REN strongly supports this language and contends that the intent of that decision and the need for the development of a new REN in the Riverside and San Bernardino Counties is the same. Further, the I-REN meets the definition of a REN described in the same decision, “A REN should be composed of multiple local governments or associations of governments covering a large geographic area of the state with similar demographic and/or geographic characteristics, such as the Bay Area, the Sierras, the Central Valley, etc.”[2] Finally, WRCOG believes that based on this decision and more recent ones (D.16-08-019) that along with SBCOG and CVAG, it should be able to present a business plan for consideration as long as it follows CPUC regulations and process, and develop programs that align and meet with the three criteria defined in D.12-11-015.

“REN program proposals should be approved if they meet one of the following three criteria: activities that utilities cannot or do not intend to undertake; pilot activities where there is no current utility program offering, and where there is potential for scalability to a broader geographic reach, if successful; and pilot activities in hard to reach markets, whether or not there is a current utility program that may overlap.”[3]

II. Summary of Comments

[1] D.12-11-015, pg. 8.
[2] Ibid, pg. 117.
[3] Ibid., pg. 118.

- RENs are regional in nature and able to develop programs that cover much broader geographies than CCAs or LGPs.
- RENs mission as defined by the CPUC criteria is to fill gaps, develop programs the Investor Owned Utilities (IOUs) will not, and serve hard to reach customers – all of which are typically not part of the CCA or LGP portfolio – in large part because they are not cost effective.
- LGPs are under the auspices of the IOUs and are not necessarily able to be used in the way the local jurisdictions believe are the most useful or effective. RENs ability to design and develop programs for their communities in the sectors and locales needed is an essential and important differentiation.
- The process and procedures developed for the Rolling Portfolio are effective in vetting and ensuring that the programs and portfolios presented are needed and important. That process should be used to evaluate new RENs, following the schedule that has already been defined and working with the CAEECC to ensure there is effective stakeholder input.

III. Inland Regional Energy Network Responses to Questions for Parties and Comments

1. **Threshold REN policy. Are RENs still appropriate (new or existing) in light of likely geographic overlap, and/or portfolio overlap, with CCAs and LGPs? Why or why not? What unique value do RENs bring, if any, compared to CCA or LGP programs?**

In 2012, the CPUC authorized a new model for administering energy efficiency programs outside of the traditional IOU-administered LGP, known as Regional Energy Networks (RENs). Since then, three RENs have been authorized in California, including the 3C-REN just approved in 2018. The BayREN and SoCalREN have successfully been providing energy efficiency programs for their regions and have advanced the platform of how energy efficiency is being provided to local governments. The field of energy efficiency is a fast-paced environment and is always changing due to the goals the State of California must meet. From greenhouse gas, climate change and policy, and implementing new energy efficiency technology, RENs have been working to achieve these goals and much more.

With the role of LGPs diminishing and the IOUs moving forward with outsourcing roughly 60% of their energy efficiency portfolio, the future of RENs is much more vital to the State of California. RENs are increasingly appropriate and valuable in light of the proliferation of CCAs and the reduced resources and capacity of the LGPs, thereby reducing their reach and agility.

The territories of RENs approved to date are larger than those of the CCAs and LGPs, which allows RENs to operate at scale – something that is more appropriate for certain program operations. Broader regional consistency affords more consistent customer experience, contractor and other market actor engagement, and economies of scale. Moreover, the RENs innate characteristic of being regional allows local governments (i.e., cities, CCAs, LGPs, and others) to partner, pilot, and propagate new ideas effectively across a broader area. RENs can help energy-related programs, actors, and stakeholders, such as program contractors, connect with each other across the region and leverage each other's knowledge and expertise. At the same time, RENs work on a small enough scale to also allow in-depth knowledge of local conditions. Regional delivery results in reduced costs through leveraged resources, economies of scale, streamlined project delivery services/assistance, and effective market conditions for participating contractors.

LGPs, such as WRCOG's Western Riverside Energy Partnership (WREP) Program, were approved by the CPUC and allow IOUs to work with local governments on the implementation of LGPs. LGPs typically focus on three objectives: 1) retrofitting local government buildings; 2) promoting utility core programs; and 3) supporting qualified energy efficiency activities included in the California Long-Term Energy Efficiency Strategic Plan.

WREP, formed in 2010, is administered by WRCOG to achieve the above-stated objectives. WREP works closely with WRCOG's member agencies, as well as Southern California Edison (SCE) and SoCalGas, to provide project support and community outreach across a number of energy efficiency initiatives. WREP has been extremely impactful over the last 9 years, resulting in a total savings for member jurisdictions of over 16.7 million kWh (equivalent to 2,000 homes' electricity use for one year) and over 9,000 therms (equivalent to electricity use for 8 homes for one year). Subsequently, WREP estimates to achieve an energy savings of about 17 million kWh in 2019 / 2020 through the implementation of various LED Streetlighting retrofits for 11 agencies in Western Riverside County.

Coachella Valley Association of Governments (CVAG) secured Strategic Plan funding and implemented the "Green for Life" program, which helped seven cities and one tribe to reach ambitious energy savings goals. Through this grant, the participants were able to complete greenhouse gas inventories, Climate Action Plans, Energy Action Plans, and much more. The Green for Life program was run in tandem with the Desert Cities Energy Partnership (DCEP) to achieve further energy savings. The DCEP is still in operation and consists of representatives from 11 CVAG member cities and one tribe, as well as representatives from SCE and SoCalGas.

The San Bernardino Council of Governments (SBCOG) / San Bernardino Regional Energy Partnership (SBREP) received strategic planning funding to implement benchmarking for four cities in the partnership with the goal of seeing where city facilities ranked amongst others in the region of similar size/operations. SBREP has reduced more than 3 million kWh and helped participating cities receive more than $1 million in incentives combined. To date, 12 cities participate in the SBREP, which was formed in late 2015.

Despite these gains, IOUs are diverting resources from DCEP, SBREP, WREP and other LGPs in favor of programs that will yield higher cost effectiveness and focusing less on savings for local jurisdictions.

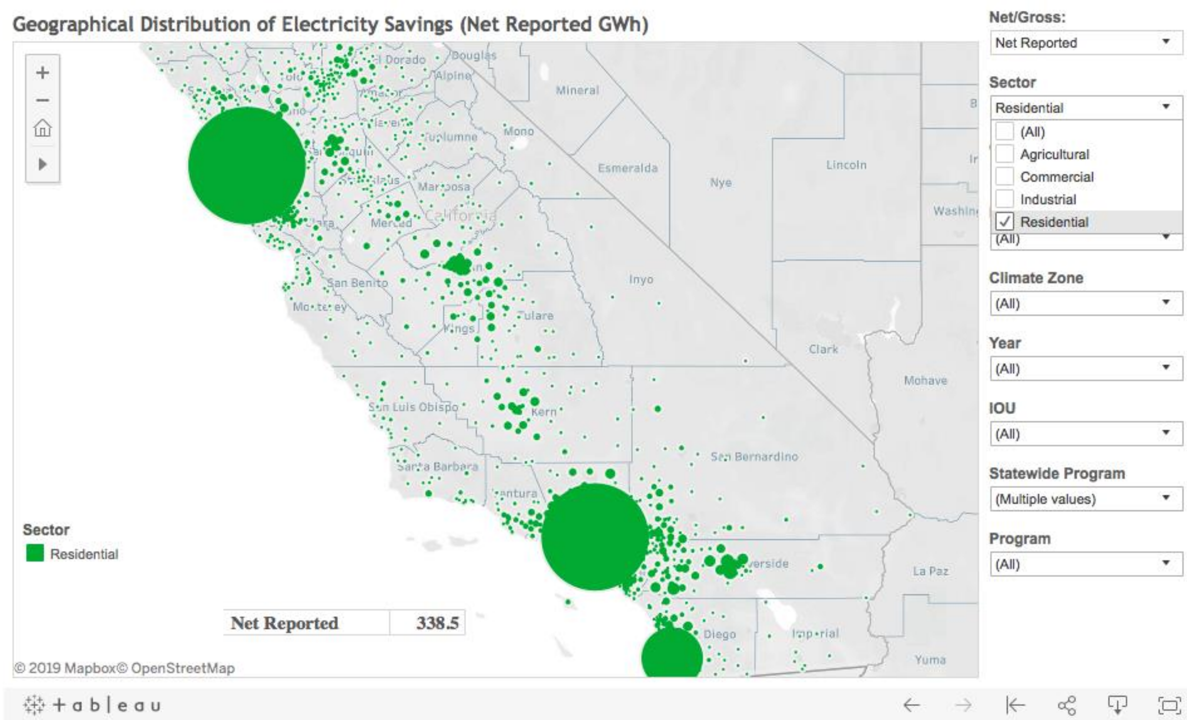
With their approved Business Plans, and an increased percentage of third-party implementation of their portfolios, the IOUs have essentially eviscerated LGPs, focusing local governments to non-resource activities in 2020 and beyond. With very limited potential exceptions, the LGPs are unlikely to be involved in future resource program administration nor implementation.

As noted above, the future of LGPs is uncertain. In this context, the role of RENs needs to grow and become a cornerstone of energy efficiency program administration, acting as a stable channel by which local governments have a voice and bring resources to bear on supporting the State to achieve its bold energy goals. The future of existing and potential RENs can bring unique value to the State as it allows for the opportunity to bring diverse local governments together to design, administer and implement programs that are catered not just to one agency, but all that is involved with a REN. A REN's primary focus is to fill the gaps within the field of energy efficiency. Whether it's in PG&E, SCE, SoCalGas, or SDG&E territories, RENs will focus and support the State goals and not just those of the IOUs as they will have programs tailored to the areas that are left underserved. RENs are made more attractive as they have the resources to leverage current IOU programs to support with ongoing energy efficiency efforts. Lastly, RENs have the ability to design, develop, and direct funds based on local government priorities, free from IOU constraints as is the case with LGPs.

RENs are regional in nature and able to develop programs that cover much broader geographies than CCAs or LGPs. RENs mission as defined by the CPUC criteria to fill gaps, develop programs the IOUs will not, and serve hard to reach customers – all of which are typically not (if ever) part of the CCA or LGP portfolio – in large part because they are not cost effective.

While CCAs may cover a city or county they are usually not as regionally oriented as a REN, with many CCAs focused on smaller territories. Further, CCAs allow local governments to procure power on behalf of their residents, businesses and municipal accounts from their chosen suppliers while transmission continues to be from their existing utility. Their ability to procure renewable energy is a specific and central focus of their business model. While they have some programs, they are typically related to transportation (electrical vehicles, charging stations) and building electrification which cannot be paid for by energy efficiency dollars. To date, few CCAs are managing and implementing ratepayer funded energy efficiency programs. They instead benefit from working with RENs to complement their core services. The combination of a REN and CCA provides a powerful partnership, not an overlap or duplication.

The potential Inland REN comprised of WRCOG/SBCOG/CVAG territory has been historically underserved. Much of this is due in part to the distance from large metropolitan and contractor service areas. As illustrated in the energy efficiency statistics data map below, San Bernardino County and Riverside County have not been served with the priority or to the level that a dedicated REN in the region would.



In short, the role of the LGPs across the state has diminished given the significant reduction of budgets and choices of programs thereby alleviating the perception that the RENs are the future and evolution of the LGPs.

2. **Existing REN policy. Should the Commission consider cancelling REN programs after the expiration of the current business plan period? Why or why not?**

No, the Commission should not consider cancelling the REN programs because RENs have been an important mechanism for assisting both the IOUs and the State of California with their energy efficiency initiatives. A REN's requirement to fill gaps, address hard to reach audiences, or provide programs the IOUs will not, is essential to ensuring that ALL Californians have access to affordable energy efficiency solutions. By cancelling the currently authorized RENs, the efforts that have been achieved would all have gone to waste and would not be a good use of ratepayer funds. The RENs have spent many years creating relationships and piloting innovative approaches to address the barriers of customers adopting energy efficiency. If the RENs were to be cancelled, that knowledge, trust and relationships would dissipate.

Furthermore, the cancellation of RENs and their programs would also limit or decrease the successful participation that RENs have conducted over the years with local government agencies. Local governments look for energy efficiency support through RENs and have achieved great success over the years. Without RENs in the driver's seat, many agencies would not have been able to achieve the gains they have or they would not have been as involved in energy programs.

Why take a valuable resource away from an agency if it is vital to its growth and success? RENs should remain and exist through the consideration of the Commission. With more and more challenges arising in the field of energy, RENs will continue to use all resources and work with the IOUs to continue breaking barriers to be successful in providing energy programs to customers under REN jurisdictions.

3. **New REN policy. Should the Commission consider discontinuing the opportunity for formation of new RENs? Or should the Commission consider new REN proposals? Why or why not?**

No, the Commission should not consider discontinuing the opportunity for the formation of new RENs because each region is unique, with a diversity of constituents and energy needs. RENs provide a valuable and important link to the future of California's climate policy – their ability to enable local governments to reach their constituents, develop unique and tailored energy efficiency programs, and to provide local workforce education and training, along with targeted outreach and marketing is critical to make sure that all California's have access to ratepayer funded energy efficiency programs.

CVAG, SBCOG, and WRCOG see the development of a REN within both San Bernardino and Riverside Counties as an evolution and enhancement to the LGPs. With the current challenges of decreasing LGP budgets and the outsourcing of energy efficiency programs to third-party contracting and cost effectiveness requirements, it is likely that hard to reach customers will go largely underserved. Current and new RENs could fill this gap and ensure an equitable distribution of ratepayer access across the state. RENs offer a unique opportunity to meet CPUC's energy efficiency goals and rate payers continue to benefit from regional program administration. As stated earlier, the proposed REN in both San Bernardino and Riverside County would look to evolve and expand the impact of LGPs within CVAG, SBCOG, and WRCOG. Each COG will work together within the REN to provide programs and support to its municipalities, residents, and businesses developing energy efficiency programs that meet the three criteria established by the CPUC and to further help meet California's energy goals, particularly those identified in SB 350.

For those applicants considering forming a REN, new applications should be considered, and the programs evaluated based on the established criteria in D.12-11-005. Additionally, in order to be considered as a REN, the proposed entity would submit a compliant Business Plan and coordinate with the California Energy Efficiency Coordinating Committee (CAEECC) on their role as a potential REN within the region and receive and respond to stakeholder input. The process and procedures developed for the Rolling Portfolio are effective in vetting and ensuring that the programs and portfolios presented are needed and important. That process should be used to evaluate new RENs, following the schedule that has already been defined and working with the CAEECC to ensure there is effective stakeholder input.

- Similar to the issues and opportunities raised in question 1, assessing and considering new RENs is a critical element to achieving equitable distribution of ratepayer funds, and an important channel to reach communities that have historically not participated in these ratepayer programs.
- The process and procedures developed for the Rolling Portfolio are effective in vetting and ensuring that the programs and portfolios presented are needed and important. That process should be used to evaluate new RENs, following the schedule that has already been defined and working with the CAEECC to ensure there is effective stakeholder input.

- RENs provide a valuable and important link to the future of California's climate policy – their ability to enable local governments to reach their constituents, develop unique and tailored energy efficiency programs, and to provide workforce education and training locally, along with targeted outreach and marketing is critical to make sure that all California's have access to ratepayer energy efficiency funds.

4. **Criteria for REN evaluation. Are the criteria adopted in D.12-11-015 and reaffirmed in D.16-08-019 still the appropriate criteria to apply to RENs and their programs? Or should new or different criteria be developed and applied?**

Per D.12-11-015 and D.16-08-019, RENs were required to address the following three operational areas, which are expressly focused on not duplicating the work of IOU-operated programs:

1. Activities that utilities cannot or do not intend to undertake. The rationale for this should be obvious – if a REN can deliver a service to the market that the utilities cannot, it should be considered.

2. Pilot activities where there is no current utility program offering, and where there is potential for scalability to a broader geographic reach, if successful. In this case, the concept would be to test program delivery that is different or unique, for potential to be scaled up to a statewide approach delivered either by RENs and/or by utilities in the future.

3. Pilot activities in hard to reach markets, whether or not there is a current utility program that may overlap. These activities may or may not be intended to be scalable to a larger area. The rationale is that hard-to-reach markets (including multi-family, low-to-moderate-income residential, and small commercial) need all the help they can get to achieve successful energy efficiency savings. A piloted approach may work well in a particular geographic region because of its specific characteristics, or it may be appropriate for a wider delivery by RENs and/or utilities elsewhere. [4]

[4] D. 12-11-015, pg. 17.

Overall, the criteria set forth above are still appropriate for RENs and should continue to be the factors for providing energy efficiency programs and support to its members that are located with REN jurisdiction. We recommend one change in wording. Due to the changes in the definition of "hard-to-reach" and the potential to negatively impact those in greatest need, we recommend adding the words "or underserved" to the third criteria. In D-12-11-015, it is footnoted that the Energy Efficiency Policy Manual indicated

"Hard to reach residential customers are defined as "those customers who do not have easy access to program information or generally do not participate in energy efficiency programs due to a language, income, housing type, geographic, or home ownership (split incentives) barrier." Hard to reach business customers also include factors such as business size and lease (split incentive) barriers."[5]

The newly adopted hard-to-reach definition may prove difficult and ineffective in the advancement to serve those with the greatest needs. Based on the current definition of hard to reach, remote areas of the approximate 27,000 square miles of geographic territory that includes Riverside and San Bernardino County are considered part of the Greater Los Angeles Metropolitan Area. In fact, Riverside and San Bernardino Counties extend, respectively, to the borders of Arizona and Nevada. As an example, the distance from Blythe, CA to Los Angeles, CA is 224 miles, while the distance from Blythe to Phoenix, AZ is 151 miles. Additionally, Baker, CA is 177 miles from Los Angeles, CA, compare to 94 miles to Las Vegas, NV.

5. **Application of REN criteria. Should REN programs be required to meet all of the criteria from D.12-11-015 and not just one? Why or why not?**

REN programs should not be required to meet all of the criteria set forth in D.12-11-015. Current requirements that REN programs meet one of the approved REN criteria have effectively ensured that REN programs do not duplicate existing IOU program offerings while increasing the range of programs available to all customers, including in hard-to-reach markets (as defined prior to D.18-05-041).

[5] Energy Efficiency Policy Manual, V5, p.15.

If a REN can demonstrate it is meeting one of the three criteria then they should not have to address the other two requirements.

6. New REN geography. Should the Commission consider proposals for formation of new RENs that overlap with existing or other new REN proposals? Why or why not?

Yes, with the current challenges that have arisen for LGPs, CVAG, SBCOG, and WRCOG would like to recommend to the Commission that they consider the approval of RENs that overlap with existing or other new RENs. CVAG, SBCOG, and WRCOG see the development of a REN within both San Bernardino and Riverside Counties as an evolution to the diminishing LGPs. With the current challenges of decreasing LGP budgets and the outsourcing of energy efficiency programs to third party contracting and cost effectiveness requirements, it is likely that hard-to-reach customers will be largely underserved. Current and new RENs could fill this gap and ensure an equitable distribution of ratepayer funds across the state. RENs offer a unique opportunity for the CPUC's Energy Efficiency Portfolio to continue to benefit from regional program administration.

The proposed Inland REN includes all of San Bernardino and Riverside County and overlaps with the SoCalREN. In order to work collaboratively, the Commission may require a cooperation proposal and plan be presented before the CAEECC as part of their business plan. This presentation of cooperation would serve as a basis for the RENs Joint Cooperation Memo (JCM) with RENs and IOUs if their business plan is approved. Overlapping RENs, in order to avoid duplicative programs while filling gaps in existing IOUs offerings, would file an annual JCM to prevent market confusion. Furthermore, CVAG, SBCOG, and WRCOG have been engaging with SoCalREN on how a potential REN would look like in both San Bernardino and Riverside Counties. All three COGs have spoken to SoCalREN and explained that there are underserved communities within both Counties whose needs have not been met. Further, SoCalREN's programs are limited and are not fully operational in the San Bernardino / Riverside County area. During the Joint Collaboration Memo effort, the parties can work together to ensure there is no duplication of effort. This would be similar to what BayREN does with MCE or 3C-REN does with PG&E, SCE and SoCalGas in their territory.

We believe that by forming our own Inland REN, we would have an advantage over existing RENs overlapping our boundaries due to our distinct knowledge of our respective regions. Using this knowledge, we could partner with SoCalREN to use the efficacious portions of their programs, as well as implement our own area specific programs, thus further filling in the gaps. The Inland REN would allow local jurisdictions to focus on improving the local communities more effectively than having a remote, out-of-the-area party serve our unique communities.

7. **New REN timing. If you recommend that the Commission consider formation of new RENs, when during the rolling portfolio cycle should such proposals be considered?**

In D.14-01-033, the Commission ruled that first-time applicants' proposals are reviewed at any time. As indicated in this decision, a new REN proposal should follow the policies, procedures, and schedule developed for the Rolling Portfolio. There should not be a set time or window to consider REN business plans and they must fit into the current schedule. This would mean that a proposed business plan must coordinate and go through the CAEECC process and CPUC approval process, and only then would be eligible to submit annual budget advice letter filings, a JCM, metrics and implementation plans to be approved at the same time as the other PAs.

Therefore, it is understood that if CVAG, SBCOG, and WRCOG are granted permission to follow the REN process, it would likely not be able to begin implementation until 2021.

8. **REN sector limitations. Should RENs be limited to delivering programs in specific sectors (e.g., the public sector, or multi-family buildings) or to specific populations (e.g., hard-to-reach communities)? Explain your rationale.**

The adopted REN criteria discussed in Question 4 is an effective framework in concert with CAEECC and CPUC oversight to determine if a program in a particular sector is needed.

Excluding a sector without this understanding does not contribute any benefits and would likely create unnecessary limits to the creativity and innovation that a REN can offer their community. Accordingly, the RENs and any Program Administrators should not be limited to a specific Sector. All programs vary and depend on a variety of factors. If a REN can demonstrate a need and an effective approach for either a non-resource or resource program, particularly in underserved communities or with small businesses then the idea should be presented through the business planning process.

REN programs should demonstrate that they fill a gap and help the state achieve its energy related policy goals, particularly those hindered by constrains on IOU program design. Because these gaps may change over time, it is premature to determine specific sector limits for the RENs.

9. **REN program types. Should RENs be limited to offering certain types of programs only (e.g., non-resource programs or resource programs)?**

No, the RENs should not be limited to offering a certain type of program or within a specific sector. RENs should be allowed to offer and implement a variety of programs, resource and non-resource across all sectors, assuming they meet one of the criteria in D.12-11-015. See Question 8.

10. **Cost-effectiveness requirements. Should RENs be required to meet a certain cost-effectiveness threshold in order to be approved or continued? If so, what level, and why?**

There should not be cost-effective requirements for RENs as they are required to "fill the gaps" that the utilities "don't want to do, or cannot do." These gaps typically exist due to the inability of a utility to effectively engage the customer type or more likely due to the lack of cost effectiveness. Further, cost-effectiveness is a measure for utilities across an extensive portfolio of programs that allows for winners and losers to balance out the ultimate Total Resource Costs. RENs with their limited and constrained program mix, do not have the ability to create a balanced portfolio. If a cost-effective requirement is put on these difficult to enact programs the targeted customers will not be served maintaining an unequal system of ratepayer programs. Many of the residential specific programs are not cost-effective, especially when they focus on "hard to reach" or "disadvantaged communities" who need them the most.

11. REN evaluations. Are there specific studies that the Commission should undertake to more directly evaluate the effectiveness of the REN programs thus far? Please describe.

A few potential ideas for studies that the Commission can look into to further evaluate the effectiveness of RENs so far can be found below:

1. What programs have worked in the past and what has not? This can help with identifying service areas that lacking energy support and can lead to new ideas to support those areas.
2. What customers are the third-party program implementers not serving?
3. With the future of LGPs diminishing, what sectors will be left unserved and how can RENs fill these gaps?

Answering these questions could help to provide quality information not just for the future of RENs but also for new programs that would align with existing and newly approved RENs.

IV. Conclusion

WRCOG is thankful for the time and consideration in providing these comments to R.13-11-005. We look forward to working with the Commission in the near future on these important issues on the topic of RENs.

Respectfully submitted,

/s/

By: CASEY DAILEY
Director of Energy & Environmental Programs
Western Riverside Council of Governments
3390 University Ave., #450

Riverside, California 92501
Telephone: (951) 405-6720
E-mail: cdailey@wrcog.us

For the Inland Regional Energy Network

Western Riverside Council of Governments (WRCOG), Coachella Valley Association of Governments (CVAG), and San Bernardino Council of Governments (SBCOG)

Dated: April 16, 2019 in Riverside, California