BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U-902-M) to Revise its 2024-2031 Energy Efficiency Rolling Portfolio Business Plan	A.25-04-014 (Filed April 25, 2025)

REPLY BRIEF OF THE CALIFORNIA EFFICIENCY + DEMAND MANAGEMENT COUNCIL

Date: July 15, 2026

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I. INTRODUCTION

The California Efficiency + Demand Management Council (CEDMC)[1] submits this Reply Brief in the above-captioned proceeding, which has been timely filed and served pursuant to the California Public Utilities Commission (CPUC or Commission) Rules of Practice and Procedure 13.11 and the instructions contained in the Administrative Law Judge's (ALJ) April 7, 2026, *Email Ruling Granting, In Part, Motion Requesting Amended Schedule.*[2]

As a trade association for non-utility businesses that provide energy efficiency (EE) and data analytics services and products in California, the issues

[1] Please note that in previous comments, the California Energy Efficiency + Demand Management Council has been defined as "Council," however, to avoid any confusion, we will use CEDMC going forward.

CEDMC is a statewide trade association of non-utility businesses that provide energy efficiency, demand response and data analytics services and products in California. Our member companies employ many thousands of Californians throughout the state. They include EE, DR and distributed energy resources (DER) service providers, implementation and evaluation experts, energy service companies, engineering and architecture firms, contractors, financing experts, workforce training entities, and energy efficient product manufacturers. CEDMC's mission is to support appropriate EE, DR and DER policies, programs, and technologies to create sustainable jobs, long-term economic growth, stable and reasonably priced infrastructures, and environmental improvement. (For more information, please go to http://www.CEDMC.org.)

[2] Application (A) 25-04-014, *Email Ruling Granting, In Part, Motion Requesting Amended Schedule,* p. 3 (Apr. 7, 2026)

raised by San Diego Gas & Electric's (SDG&E's) proposed revisions to its 2024-2031 Energy Efficiency Business Plan directly affect the design, delivery, scale and long-term performance of statewide and utility-administered efficiency and demand management programs. CEDMC provides the Commission with practical, implementation-focused perspectives on market capabilities, delivery risks, cost effectiveness, and overall support for the future of energy efficiency in California through policies, programs, and technologies.

CEDMC is providing this Reply Brief after reviewing the record in this proceeding from SDG&E's Application through Opening Briefs on July 1, 2026, and subsequent Motions. CEDMC also filed Opening Comments on the Joint Motion for Adoption of Settlement Agreement.

II. RECOMMENDATIONS

- The Commission should adopt only record-limited findings regarding SDG&E's regional EE portfolio and should not find that regional EE in the San Diego region is inherently infeasible or no longer cost effective as a resource class. Any findings should account for the record evidence showing recent Resource Acquisition (RA) performance at or above the applicable cost-effectiveness threshold and should avoid treating SDG&E's portfolio-specific experience as dispositive of future regional EE value.

- The Commission should not rely on SDG&E's and the Public Advocates Office (Cal Advocates) unsupported affordability narrative unless it is revised to reflect long-term net customer value. The record does not support a finding that withdrawal establishes approximately $300 million in net ratepayer savings because that figure treats avoided spending as savings while omitting lost total system benefits (TSB), avoided-cost benefits (aka supply side costs), participant bill savings, non-energy benefits, replacement program spending, transition costs, reliability value, customer access, and the value of Market Support and Equity programs.

- If the Commission approves SDG&E's withdrawal, it should preserve a pathway for continued regional EE funding and successor program development by San Diego Regional Energy Network (SDREN), another program administrator (PA), or multiple PAs through a future business plan application (BPA), EE rulemaking, or comparable Commission process. Approval of withdrawal should not collapse the

funding pathway or foreclose future regional portfolios designed around demonstrated local needs.

- The Commission should require a structured and transparent transition that protects customers and preserves regional market capacity. At minimum, the decision should require transition-related data from SDG&E, stakeholder engagement, a future gap analysis by the PA or PAs proposing to serve the region, and a customer-access analysis so that low historical participation is not treated as proof that customers will not be harmed.

- The Commission should avoid establishing broad statewide precedent in this application regarding investor-owned utility (IOU) withdrawal, successor portfolio design, regional energy network (REN) responsibilities, or restoration triggers. Those issues should be addressed in future BPAs, EE rulemakings, or related proceedings informed by data, stakeholder engagement, and specific successor proposals.

III. THE COMMISSION SHOULD LIMIT FINDINGS TO THE RECORD

The record supports a narrower and more practical set of Commission findings than those urged by SDG&E and Cal Advocates. CEDMC does not need to oppose every aspect of SDG&E's requested withdrawal to preserve the key record-supported points: regional energy efficiency remains valuable, the asserted affordability benefits of withdrawal are overstated, and any approval must include transition protections, data sharing, and a pathway for successor regional program development.

A. The Commission Should Avoid Broad Findings that Regional EE Is Inherently Infeasible or No Longer Cost-Effective as a Resource Class.

The record does not support converting SDG&E's portfolio-specific experience into a broad finding that regional EE in the San Diego region is inherently infeasible or no longer valuable. SDREN's Opening Brief states:

> *"SDG&E's historical TRC performance may be indicative of the feasibility of its own portfolio, but it does not establish that future EE programming in the San Diego region . . . would likewise fail to provide cost-effective or beneficial results."*[3]

[3] A.25-04-014, Opening Brief of San Diego Community Power on Behalf of San Diego Regional Energy Network, Clean Energy Alliance, and the City of San Diego (together: SDREN), at p. 10. (July 1, 2026)

Small Business Utility Advocates (SBUA) Opening Brief is similar:

> *"Even if the Commission accepts that certain SDG&E programs have historically underperformed, that should not be interpreted as a global truism that regional EE programming is not cost-effective or beneficial, from a portfolio-wide perspective."*[4]

SDG&E and Cal Advocates rely heavily on historical Total Resource Cost (TRC) claims and program-by-program performance assertions, including claims that SDG&E's regional portfolio failed to achieve a TRC score of 1.0 or greater from 2015 through 2024[5] and that continuing these programs would be unjust and unreasonable.[6] But CEDMC's analysis shows those claims omit important context, including program start dates, programs that had not yet launched or launched mid-2024, programs closed since 2017, and the inappropriate comparison of Market Support and Equity programs against RA programs using TRC alone.[7]

Table 1 below shows an alternative framing of the table that Cal Advocates included in their Opening Brief[8] that demonstrates a positive trend in SDG&E's regional program offerings. CEDMC's review of the programs SDG&E proposed for closure[9] indicates that only one of the programs listed is a regional RA program that has been in the market for at least one full year had a TRC below 1.0 in 2025, and this program has a TRC of 0.96. In 2024, only one active RA program fell significantly short of a 1.0 TRC, two achieved a TRC of 0.99, and three exceeded 1.0 TRC.[10]

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[4]Opening Brief of Small Business Utility Advocates, at p. 3. (July 1, 2026)
[5] Opening Brief of the Public Advocates Office, at p.13. (July 1, 2026)
[6] Id, at p. 18.
[7] CEDMC Comments on Joint Motion for Adoption of Settlement Agreement, at p.3. (June 1, 2026)
[8] Opening Brief of the Public Advocates Office at Table 1, citing Exhibit CA-01 at 2-3 and 2-4, and CEDARS (July 1, 2026),.
[9] Opening Testimony on SDG&E's Application to Revise its 2024-2031 Energy Efficiency Rolling Portfolio Business Plan (January 15, 2026) (Ex.CA-01) at pp. 2-3 and 2-4.
[10] CEDMC Comments on Joint Motion for Adoption of Settlement Agreement, at p.4.

Table 1: SDG&E Proposed Regional RA Program Closures with Program Date[11] and 2017 - 2025 TRC

Row No.	Program ID	Program Name	Program Segment	2017	2018	2019	2020	2021	2022	2023	2024	2025	Program Start Date
1	SDGE4002	Multi Family Program	RA				0.00	1.14	1.32	1.80	1.01	1.13	09/14/2020
2	SDGE4012	Federal Customer Services Program	RA					0.00	0.21	0.20	0.03	1.34	09/10/2021
3	SDGE4001	Single Family Program	RA					0.00	0.04	0.75	0.99	0.96	08/15/2022
4	SDGE4009	Agricultural Growers Services Program	RA						0.20	0.50	0.99	1.03	08/31/2022
5	SDGE4040	IDSM Local Residential Behavioral Program (EE)	RA							0.67	1.66	1.76	12/16/2022
6	SDGE4006	Industrial Sector Program	RA							0.00	1.13	1.67	01/06/2023
7	SDGE4170	Wholesale/Retail/Office, including Entertainment Services	RA									1.27	10/16/2024
8	SDGE4168	Lodging (Hotels/Motels)	RA									0.86	02/20/2025
9	SDGE4169	Groceries, Restaurants and Food Storage	RA									0.62	01/27/2025
10	SDGE4171	Private Institutions/Healthcare	RA									0.18	02/14/2025
11	SDGE4201	Market Access Program - Residential	RA									0.00	04/11/2025
12	SDGE4202	Market Access Program - Commercial	RA									0.47	04/11/2025

Source: Public Advocates Office Opening Brief, A.25-04-014 (July 1, 2026), Table 1, citing Exhibit CA-01 at 2-3 – 2-4 and CEDARS.
Program Start Date source: SDGE 2025 Annual Report, Sheet T-7 "3P Contract Info" (Program Start Date reflects the date SDG&E received CPUC approval of its contract advice letter).

While CEDMC's analysis of the June 1, 2026, CEDARS data overstated the TRC due to an apparent error in the CEDARS data for that day,[12] our subsequent review of revised publicly available CEDARS data on July 12, 2026, continues to indicate a cost-effective portfolio with a TRC of 1.19 for the RA segment when including statewide programs, and a TRC of 1.05 when statewide programs are removed. This is supported by SDG&E's 2025 Annual Report.[13] SDG&E's Mid-Cycle Advice Letter forecasted TRC of 1.12 for the RA segment during the 2024-2027 period, and SDG&E delivered 112 percent of its total system benefit (TSB) goal in 2024.[14] The Commission should therefore avoid broad findings about the inherent infeasibility of regional EE and instead limit any findings to SDG&E's specific portfolio record.

This conclusion is reinforced at the statewide level, as seen in the recently adopted 2025

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[11] Program Start Date source: SDGE 2025 Annual Report, Sheet T-7 "3P Contract Info" (Program Start Date reflects the date SDG&E received CPUC approval of its contract advice letter).
[12] SDG&E Reply Comments on Joint Motion of SDG&E & Public Advocates for Adoption of Settlement Agreement, at pp. 10-11. SDG&E characterized CEDMC's initial review of June 1, 2026, CEDARS data as "misinformed." However, footnote 33 on p. 11 states that "SDG&E notes that at the time of Council's Opening Comments, SDG&E believes there was a discrepancy in CEDARS, which caused the data to be incorrect."
[13] SDREN, CEA, and the City's Opening Brief, at p. 17. (July 1, 2026) citing Exh. SD CCA-03 at p.1. (Motion of San Diego Community Power to Move Exhibit into Evidence, (July 1, 2026). Motion requests that SDG&E's 2025 Annual Report be moved into the evidentiary record in A.25-04-014.)
[14] Id.

Integrated Energy Policy Report, which attributes lower near-term statewide demand growth to increased energy efficiency.[15] This confirms that EE continues to function as a critical resource rather than an "infeasible" resource class in the region.

B. The Commission Should Avoid Establishing Broad Statewide Precedent in This Proceeding.

The Commission should avoid using this application to establish broad statewide precedent regarding IOU withdrawal, successor portfolio design, or REN responsibilities. The record concerns SDG&E's specific portfolio, the San Diego region, and the limited set of PAs currently serving that region. CEDMC supports evaluating any successor portfolio based on the unique needs of the San Diego region and supports addressing broader questions through future BPAs, the EE rulemaking, or related proceedings after data, stakeholder engagement, and planning have occurred.

The Commission can approve appropriately limited relief, if warranted, while preserving flexibility for future proceedings. Doing so would avoid prejudging the scope of successor portfolios and ensure that regional EE planning is informed by the transition data, gap analysis, and stakeholder engagement that are absent from the current record. The Commission should also decline, at this time, to adopt any restoration trigger[16] or backstop requirement[17] tied to future cost-effectiveness reforms because that issue is premature and better addressed after any relevant reforms are adopted and after future PAs submit proposals to serve the region.

IV. THE COMMISSION SHOULD REJECT UNSUPPORTED SAVINGS CLAIMS

A. The Commission Should Reject Any Finding that Withdrawal Establishes $300 Million in Net Ratepayer Savings.

The record does not support a finding that SDG&E's proposed withdrawal, standing alone, establishes approximately $300 million in net ratepayer savings. Cal Advocates

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[15] "Final 2025 Integrated Energy Policy Report." California Energy Commission, 2026. CEC-100-2026-001-CMF, at p. 2.

[16] Opening Brief of Small Business Utility Advocates, at p. 11. (July 1, 2026)

[17] Id.

characterizes adoption of the Settlement as preventing ratepayers from bearing approximately $300 million in unreasonable expenditures, [18] and SDG&E frames discontinuation as a way to reduce ratepayer burden by eliminating non-cost-effective spending.[19] But the record developed shows that this calculation treats avoided spending as equivalent to net savings while omitting transition costs, replacement program spending, lost avoided-cost benefits (aka, supply side costs), customer bill savings, and system value.[20]

SBUA states that SDG&E's projected savings may be significantly overstated because the metrics fail to account for both replacement program spending and the loss of total system benefits.[21] SDREN similarly explains that SDG&E's savings calculation assumes the elimination of program spending would be fully captured as a dollar-for-dollar cost reduction, without accounting for avoided energy costs, bill reductions, and system value produced over time.[22] SDREN further identifies omitted benefits including forecast average annual bill savings of $893 million between 2026 and 2031, $11.2 billion in total average lifecycle bill savings associated with SDG&E's portfolio,[23] a projected $286 million reduction in TSB associated with SDG&E's requested budget reduction, participant bill savings, non-energy benefits, and value associated with Market Support and Equity programs.[24] Based on this record, the Commission should reject any finding that withdrawal itself produces net savings unless those offsetting benefits and costs are accounted for.

To the extent SDG&E's withdrawal rests on an assertion that it is unwilling or unable to continue delivering regional EE programs cost-effectively, that assertion does not support treating the associated system value as forgone. The CPUC's own conservative Scenario 2 analysis in D.25-08-034 establishes $300 million in cumulative TSB as achievable in SDG&E's

[18] Opening Brief of the Public Advocates Office, at p. 11. (July 1, 2026)
[19] Opening Brief of San Diego Gas & Electric Company, at p. 13. (July 1, 2026).
[20] SDREN, CEA, and the City's Opening Brief, at p. 11. (July 1, 2026)
[21] Opening Brief of Small Business Utility Advocates, at p. 5. (July 1, 2026)
[22] SDREN, CEA, and the City's Opening Brief, at p. 14. (July 1, 2026)
[23] Id, at p. 4.
[24] SDREN, CEA, and the City's Opening Brief, at p. 13. (July 1, 2026)

service territory for 2028-2031.[25] This finding is tied to the territory and its underlying market potential, not to SDG&E's particular capacity or willingness to administer the programs that capture it. If SDG&E cannot or will not deliver that value, the appropriate response is an orderly transition to a successor PA capable of doing so, not a savings calculation that assumes the value simply disappears. SDG&E's $300 million figure is accurate only if the TSB identified by the Commission's own potential study is treated as forgone rather than transferred, an assumption the record does not support absent evidence that no successor PA could capture comparable value.

B. The Commission Should Evaluate Affordability Based on Long-Term Net Customer Value, Not Short-Term Spending Reductions.

The record supports evaluating affordability based on long-term net customer value rather than short-term reductions in authorized spending. For example, CEDMC's comments emphasize that affordability must be evaluated in terms of long-term ratepayer value, not short-term administrative cost reductions, because EE programs lower customer bills and avoid more expensive supply-side investments.[26] SDREN cites the Commission's July 2025 Demand-Side Management Report to the Legislature, which found that DSM-related expenditures constitute less than five percent of utility revenue requirements while producing a highly effective return on investment through lowered overall system energy costs.[27] SDREN also identifies recent analysis indicating that EE continues to function as a least-cost resource, with substantial energy savings and demand reductions below the cost of supply-side alternatives.[28]

SBUA likewise cautions that regional EE programs are not a critical proximate cause of rate increases and that eliminating regional offerings should not be treated as a meaningful affordability solution without fully considering lost benefits, including grid-management benefits from load reduction.[29] SDREN further notes that SDG&E's requested budget reduction of

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[25] D.25-08.034. Decision Adopting Energy Efficiency Goals 2026-2037. Table 5, at p21
[26] CEDMC Comments on Joint Motion for Adoption of Settlement Agreement, at p. 7. (June 1, 2026)
[27] SDREN, CEA, and the City's Opening Brief, at p. 7. (July 1, 2026)
[28] Id, at p. 9.
[29] Opening Brief of Small Business Utility Advocates, at p. 7. (July 1, 2026)

approximately $300 million corresponds with a projected reduction in TSB of approximately $286 million, and that SDG&E's analysis omits participant bill savings, non-energy benefits, and the ratepayer value associated with Market Support and Equity programs.[30] The Commission should therefore reject an affordability analysis that counts only avoided spending and should instead evaluate net customer value, avoided costs, bill savings, TSB, non-energy benefits, reliability, and customer access.

V. THE COMMISSION SHOULD PRESERVE REGIONAL EE OPTIONS

A. If Withdrawal is Approved, the Commission Should Preserve a Pathway for Continued Regional EE Funding and Successor Program Development.

The record supports preserving a pathway for continued regional EE funding even if SDG&E is permitted to withdraw from regional program administration. SBUA states that more assurances are necessary to demonstrate that withdrawal will preserve procurement and delivery of cost-effective EE resources and warns that uncertainty remains regarding whether cost-effective resources will continue to be delivered equitably and whether customer access will be maintained.[31] SDREN similarly emphasizes that EE continues to serve affordability, reliability, equity, and decarbonization goals and that the Commission should not treat SDG&E's portfolio-specific performance as foreclosing future regional offerings.[32] At a time when San Diegans face rising energy costs, regional programs can provide flexible, locally responsive offerings capable of reaching underserved and harder-to-reach communities in ways statewide programs may not.

Accordingly, the Commission should make clear that SDG&E's withdrawal does not eliminate regional EE need or funding eligibility. Instead, the Commission should preserve the ability of SDREN, another PA, or multiple PAs to propose successor or gap-filling offerings through a future BPA, EE rulemaking, or comparable Commission process. The precise level and allocation of any successor funding can be determined in those future proceedings, but the Commission should not allow SDG&E's exit to collapse the funding pathway needed to support

[30] SDREN, CEA, and the City's Opening Brief, at p. 13. (July 1, 2026)
[31] Opening Brief of Small Business Utility Advocates, at p. 4. (July 1, 2026)
[32] SDREN, CEA, and the City's Opening Brief, at p. 2. (July 1, 2026)

successor regional portfolios that address demonstrated local needs and advance California energy policy objectives.

VI. THE COMMISSION SHOULD REQUIRE AN ORDERLY TRANSITION

A. If Withdrawal is Approved, the Commission Should Require an Orderly Transition to Avoid Service Gaps, Customer Disruption, and Loss of Regional Market Capacity.

The record supports requiring a structured transition if SDG&E's withdrawal is approved. Regional EE programs rely on continuity, established implementer relationships, project pipelines, institutional knowledge, and long-term market development strategies. SDG&E customers rely on the cost and energy savings from planned retrofits or other EE efforts to reduce the economic impact of high rates. The record identified disruption risks including delays in program delivery and project pipelines, loss of experienced implementers and staff, reduced participation due to market uncertainty, and fragmentation of regional coordination efforts.[33] SBUA's Opening Brief likewise warns that withdrawal poses a risk of disincentivizing valuable EE services for ratepayers, particularly underserved small business customers.[34]

The Commission should therefore require any withdrawal to occur on a timeline that protects continuity of service and allows sufficient time for successor planning. At minimum, the decision should preserve time for stakeholder engagement, transition data review, gap analysis, and BPA development before discontinuing regional energy efficiency. A transition period through the current portfolio cycle would support continuity of service while avoiding abrupt customer disruption, preserving market relationships, and avoiding disruptions to ongoing projects and regional EE delivery.

B. The Commission Should Require SDG&E to Provide Transition Data Needed to Evaluate Regional Needs and Preserve Customer Access.

The record supports a data-sharing requirement because the information needed to evaluate future regional needs is not otherwise developed in the Application. CEDMC's comments explain that SDG&E has not demonstrated that discontinuation is the least-cost or

[33] CEDMC Comments on Joint Motion for Adoption of Settlement Agreement, at 6 (June 1, 2026)
[34] Opening Brief of Small Business Utility Advocates, at 2 (July 1, 2026)

most cost-effective option available, and identifies alternatives that should have been considered, including targeted administrative reforms, enhanced oversight or performance management, shared or hybrid administration models, and incremental program redesign.[35] SDREN likewise states that SDG&E's Application and supporting testimony provide no meaningful evidence of corrective actions beyond seeking termination of programs.[36] Absent evidence that SDG&E took reasonable steps to correct portfolio underperformance, the Application does not support a broader conclusion that those challenges were unavoidable, regionwide, or inherent to EE itself.

To support successor planning, the Commission should require SDG&E to provide transition-related data regarding participation, customer segments served, equity and hard-to-reach participation, program-level performance, pipeline and contract information, affected offerings, and any corrective actions or program redesign efforts SDG&E undertook before seeking termination. This information should be provided in a format that supports future planning and portfolio development needs, rather than merely as an SDG&E reporting exercise. Access to this information is essential to enable future PAs, stakeholders, and communities to assess regional needs and determine whether existing offerings should be maintained, modified, expanded, consolidated, or replaced.[37]

C. The Commission Should Assign Future Gap Analysis to the Entity or Entities Proposing to Serve the Region.

The record supports a future gap analysis,[38] but the substantive analysis should be conducted by the PA or PAs seeking to serve the region rather than by SDG&E. The gap analysis should identify affected customers, market segments, program functions, and opportunities for continued, modified, expanded, consolidated, or replacement offerings, including an explanation where replacement is not proposed. It should also address how customer access will otherwise be preserved for discontinued programs not proposed for replacement.

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[35] CEDMC Comments on Joint Motion for Adoption of Settlement Agreement, at p. 7. (June 1, 2026)
[36] SDREN, CEA, and the City's Opening Brief, at p. 10. (July 1, 2026)
[37] Opening Brief of Small Business Utility Advocates, at p. 10. (July 1, 2026)
[38] Id

VII. THE COMMISSION SHOULD PROTECT CUSTOMER ACCESS

A. The Commission Should Decline to Treat Low Participation Alone as Proof that Customers Will Not Be Harmed.

SDG&E argues that "low historical participation of customers in SDG&E's regional EE programs demonstrates that customers will not be harmed by the withdrawal" and that "bill reductions resulting from SDG&E's withdrawal will benefit all customers."[39] SDG&E further argues that less than 0.5 percent of customers paying the Public Purpose Program rate participate in regional EE programs and that this level of participation raises feasibility and fairness concerns.[40] However, these arguments do not address that the core purpose of these resource programs is to benefit all ratepayers – participants and non-participants alike—by procuring the least-cost energy resource for all ratepayers such that all ratepayers benefit from these programs.

The record shows SDG&E did not make a meaningful effort to consult with customers or participants that would be most impacted by the withdrawal.[41] Low participation may identify a program-design issue or a need for better outreach, but it does not indicate low need. Further, SDG&E has no evidence to suggest that affected customers will not be harmed if regional offerings disappear without replacement. SDREN's Opening Brief expresses concern that SDG&E's own claims of good-faith redesign and mitigation efforts are not supported by meaningful detail sufficient for the Commission or successor PAs to assess whether barriers were temporary, correctable, or inherent to the region.[42] The Commission should therefore require a customer-access analysis and transition plan rather than treating participation statistics as dispositive.

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[39] Opening Brief of San Diego Gas & Electric Company, at p. 6. (July 1, 2026).
[40] Id.
[41] SDREN, CEA, and the City's Opening Brief, at p. 3. (July 1, 2026)
[42] Id, at p. 10.

VIII. CONCLUSION

The record in this proceeding supports a measured, fact-specific approach. If the Commission approves SDG&E's request to withdraw from administering its regional energy efficiency portfolio, it should avoid drawing broad conclusions about the value or feasibility of regional energy efficiency based on the experience of a single portfolio. The record instead supports findings that recognize the continued value of regional energy efficiency, evaluate affordability based on long-term net customer value rather than avoided spending alone, preserve a pathway for future regional program development, and ensure that any transition protects customers, maintains regional market capacity, and supports informed successor planning.

More broadly, this application should not be used to establish statewide policy regarding investor-owned utility withdrawal, successor portfolio design, or the future role of Regional Energy Networks. Those questions are better addressed through future business plan applications, statewide energy efficiency rulemakings, and related proceedings informed by a complete record, stakeholder engagement, and specific successor proposals.

For the foregoing reasons, CEDMC respectfully requests that the Commission adopt the recommendations set forth in this Reply Brief.

Date: July 15, 2026

Respectfully Submitted

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