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Exhibit No.:	MCE – 05
Date:	November 13, 2026
Commissioner:	Douglas
Administrative Law Judge:	Kao, Fitch
Witness(es):	Alice Havenar-Daughton Jennifer Green Alex Valenti

MARIN CLEAN ENERGY

EXHIBIT 5

OPENING TESTIMONY OF MARIN CLEAN ENERGY REGARDING ITS 2028-2031 ENERGY EFFICIENCY PORTFOLIO PLAN AND 2032-2035 ENERGY EFFICIENCY BUSINESS PLAN AND ADMINISTRATIVE LAW JUDGE'S RULING SEEKING RESPONSES TO SPECIFIC QUESTIONS IN OPENING TESTIMONY

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TABLE OF CONTENTS

1: Executive Summary 1

1. Background 1

2: Opening Testimony 2

1. Following the adoption of the California Air Resources Board's final rules on the Clean Space and Water Heater Standards, or other regional standards, should the Commission adopt a process to allow adjustments to the Business Plan Applications (in budget caps, strategies, portfolio composition, or other) based on the final rules? If so, why? Please provide a recommendation for what this process would entail. 2

2. Is equity segment funding from each applicant, individually and/or collectively, sufficient to achieve the Commission's policy objectives for the equity segment? Please provide quantitative and qualitative explanations for your response. 4

3. Southern California Edison Company proposed allowing consolidation of program delivery types into sales based or customer based. Describe considerations that would impact consolidating program delivery types in this or any other manner, including but not limited to: cost effectiveness calculations, impact to operational costs, generation and measurement of total system benefit (TSB), incentive design, delivery expectations, impact on contractor delivery of services, portfolio simplification, etc. 7

4. Southern California Gas Company proposed to allow portfolio administrators to consolidate programs with common strategies into a single program and implementation plan that can cross segments. Please address potential considerations for these unified delivery structures, including but not limited to: third-party delivery, cost-effectiveness, flexibility, innovation, vendor concentration, segmentation, procurement, and other relevant topics. 7

5. For third party program definition changes or any percent changes recommended: 8

a. Describe the impacts on investor-owned utility portfolios, including but not limited to: third-party program performance; offerings across sectors; cost effectiveness; diversification of bidders; allocation of performance and other risk; opportunities for innovation; TSB generation; and/or equity and market support outcomes. 8

b. Please identify and describe any alternative methods to using a minimum budget percentage to ensure third party delivery of energy efficiency programs. Are there other performance criteria that should be used to demonstrate compliance? Should a minimum budget percentage apply to all sectors the same way? 8

6. Should all portfolio administrators use a single definition of Equity Targeted Customer – instead of using Hard-to Reach, Disadvantaged Communities, and Underserved? If so, what are the criteria that should be included in that definition so that it can be efficiently and effectively operationalized? If not, should any of the current definitions for Hard-to-Reach, Disadvantaged Communities, or Underserved be adjusted, and if so, how? 8

a. What level of stringency is appropriate for portfolio administrators in determining who qualifies as an Equity Targeted Customer? How much flexibility should portfolio administrators have in making a determination? *9*

b. Should the definition of Equity Targeted Customer take into account the number of projects (direct install/incentive) that have historically been implemented in certain communities? If so, how? If not, why? *11*

c. Should the Commission consider the potential population size of Equity Targeted Customers in determining the appropriate definitions? If so, how? If not, why? *12*

7. Does allowing fuel switching measures (with no energy savings from regulated fuel sources): 12

a. Align with the statutory authority and legislative intent of the Commission's energy efficiency policies? Please explain. 12

b. Offer equity, grid, or other system level benefits in addition to greenhouse gas benefits? Please describe. *14*

c. Is the existing Avoided Cost Calculator (ACC) sufficient for valuing fuel switching measures? Why or why not? If not, how should the Commission value fuel switching measures? *14*

8. If the Commission authorizes energy efficiency funding for fuel switching, please address the following: 14

a. Should there be any caps, limitations, or targets? If so, describe. *14*

b. What are the likely consequences to rates (electric (kilowatt-hour and kilowatt) and gas (therm)) for relevant customer classes based on likely uptake and potential market size? To what extent will ratepayers' bills be impacted? Where? *14*

c. Should the Commission assess the costs and benefits of fuel switching in the same manner as energy efficiency and fuel substitution? If not, what differences should there be and why? Describe how your proposal would be operationalized and include whether and how treatment of electric and gas avoided costs should be assessed. *14*

d. Given that the baseline fuel in fuel switching is unregulated, how should this be considered in potential cost-effectiveness, and are there fuel switching-specific considerations for how to measure reductions in delivered fuel use? *14*

9. What, if any, considerations should the Commission make in future potential and goals decisions if energy efficiency funding for fuel switching is authorized? 14

10. Would allowing measures with no energy savings, such as low-GWP measures, to claim TSB: 15

a. Align with the statutory authority and legislative intent of the Commission's energy efficiency policies? Please explain. *15*

b. Offer equity, grid, or other system level benefits in addition to GHG benefits? Please describe. *15*

c. Is the existing ACC sufficient for valuing low-GWP measures with no energy savings? Why or why not? If not, how should the Commission value low-GWP measures if allowed? *16*

11. How can portfolio administrators determine when right sizing/power-efficient design/optimization measures (lower-cost measures like meter socket adaptor, smart splitters, or other load management devices) are effective, or when panel upsizing/upgrade/replacement (a new, higher amp panel) is needed? 16

12. How should right-sizing measures (meter socket adapters, smart splitters, and any other load management device) be considered in cost-effectiveness and measurement of program attribution (net-to-gross)? 17

13. Pacific Gas and Electric Company proposed to allow portfolio administrators to continue using energy efficiency funding for ongoing load shifting either for Program Years 2028 through 2031 or until the Commission authorizes load shifting activities in another proceeding as a more appropriate long-term venue. Under this approach, what criteria should the Commission use to determine when, how, and in what instances to discontinue energy efficiency funding for load shifting activities? Please describe considerations on size and reach of load shifting activities in other proceedings, as well as potential use of dynamic rates. 17

3: Conclusion 18

ATTACHMENT A 19

WITNESS RESUMES 19

1: Executive Summary

1. Background

Marin Clean Energy ("MCE") submits this Opening Testimony in support of its 2028-2031 ENERGY EFFICIENCY PORTFOLIO PLAN AND 2032-2035 ENERGY EFFICIENCY BUSINESS PLAN ("MCE Application") filed with the California Public Utilities Commission on March 16, 2026.[1] On September 2, 2026, Administrative Law Judge Valerie Kao issued ADMINISTRATIVE LAW JUDGE'S RULING DIRECTING SUBMISSION OF CORRECTIONS AND SUPPLEMENTAL INFORMATION FROM ALL BUSINESS PLAN APPLICANTS requiring all applicants to submit updated and supplemental testimony.[2] On September 9, 2026, Administrative Law Judge Kao issued E-MAIL RULING GRANTING MOTION FOR EXTENSION OF TIME TO COMPLY WITH SEPTEMBER 2, 2026 RULING that extended the submission date.[3] MCE submitted its updated and Supplemental Testimony on September 30th, 2026.[4]

On September 17, 2026, Administrative Law Judge Kao issued ADMINISTRATIVE LAW JUDGE'S RULING SEEKING RESPONSES TO SPECIFIC QUESTIONS IN OPENING TESTIMONY ("RULING") directing MCE and all applicants to respond to several questions by

[1] A.26-03-014, *MCE Notice of Availability* (March 16, 2026), available at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M602/K347/602347120.PDF (linking to MCE's Application and Testimony Exhibits).
[2] A.26-03-009, *ALJ's Ruling Directing Submission of Corrections and Supplemental Information From All Business Plan Applicants*, p. 2 (September 2, 2026), available at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M616/K587/616587387.PDF.
[3] A.26-03-009, *E-mail Ruling Granting Motion for Extension of Time to Comply with September 2, 2026 Ruling*, p. 2 (September 9, 2026), available at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M618/K426/618426264.PDF.
[4] MCE, *Notice of Availability of Updated and Supplemental Testimony for the Application of Marin Clean Energy for Approval of 2028-2031Energy Efficiency Portfolio Plan and 2032-2035 Energy Efficiency Business Plan*, (September 30, 2026), available at: https://mcecleanenergy.org/wp-content/uploads/2026/09/NewNoticeOfAvailability.pdf.

October 30, 2026.[5] On October 6, 2026, Administrative Law Judge Kao issued EMAIL RULING PARTIALLY GRANTING EXTENSION REQUEST AND MODIFYING PROCEEDING SCHEDULE ("Extension") that extends the submission date of Opening Testimony to November 13, 2026, and Rebuttal Testimony to December 15, 2026.[6] MCE timely submits its Opening Testimony in accordance with Administrative Law Judge's Rulings.

MCE's testimony responds to Ruling questions and focuses on budgets and goals, program proposals, equity, building decarbonization, low global warming potential ("low-GWP") and integrated demand side management ("IDSM") issues. MCE resubmits several of its existing Application policy recommendations,[7] responds to other Applicants' proposals, and offers additional factual support to the record.

2: Opening Testimony

MCE respectfully requests the Commission approve its Application. MCE provides answers to the Administrative Law Judge's Ruling Specific Questions.

1. *Following the adoption of the California Air Resources Board's final rules on the Clean Space and Water Heater Standards, or other regional standards, should the Commission adopt a process to allow adjustments to the Business Plan Applications (in budget caps, strategies, portfolio composition, or other) based on the final rules? If so, why? Please provide a recommendation for what this process would entail.*

As discussed in its Supplemental Testimony and throughout MCE's Application, MCE considered the impact of the California Air Resources Board's ("CARB") potential new rules on

[5] A.26-03-009, *ALJ's Ruling Seeking Responses to Specific Questions in Opening Testimony*, pp. 1-2 (September 17, 2026), available at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M618/K703/618703585.PDF.
[6] A.26-03-009, *Email Ruling Partially Granting Extension Request and Modifying Proceeding Schedule*, pp. 3-4 (October 6, 2026) available at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M622/K777/622777226.PDF.
[7] MCE, Exh. MCE-01, *Testimony of Marin Clean Energy Regarding Its 2028-2031 Energy Efficiency Portfolio Plan and 2032-2035 Energy Efficiency Business Plan*, pp. 172-186.

Clean Space and Water Heater Standards[8] and the Bay Area Air District's ("BAAD") Rule 9-4: Nitrogen Oxides from Natural Gas-Fired Furnaces – 2023 and Rule 9-6: Nitrogen Oxides Emissions from Natural Gas Fired Water Heaters – 2023 Amendment[9] when preparing and submitting its Application. Since the submission of MCE's Application in March 2026 and Supplemental Testimony in September 2026, no significant changes to CARB Clean Space and Water Heater Standards have occurred that impact its Application. The final CARB Clean Space and Water Heater Standards for the 2028-2035 Business Application period remain unknown. On November 4, 2026, BAAD voted to adopt proposed amendments to Rule 9-6.[10] In MCE's analysis, these amendments do not significantly impact its Application. MCE will continue to track and engage with related rulemakings. MCE does not presently request a process to allow adjustments to its Application and Business Plan. MCE notes rolling portfolio rules already allow a great deal of flexibility for program administrators ("PAs") to adjust strategies, program budgets, and portfolio composition throughout a portfolio cycle.[11]

MCE does not conceptually oppose a Commission process for PAs to request additional EE funds during a four-year cycle if appropriately justified and subject to a meaningful public process. However, as stated in its Application **Chapter 11: New or Modified EE Policies** Recommendation 3 on clarifying the mid-cycle advice letter process and segment specific budget

[8] MCE, Exh. MCE-04, *Testimony of Marin Clean Energy Regarding Its 2028-2031 Energy Efficiency Portfolio Plan and 2032-2035 Energy Efficiency Business Plan and Administrative Law Judge's Ruling Directing Submission of Corrections and Supplemental Information from All Business Plan Applicants*, pp. 8-10.
[9] *Id*.
[10] BAAD, *Air District Board of Directors adopts water heater rule amendments and delays implementation to January 2028*, (November 4, 2026), available at: https://www.baaqmd.gov/en/News-and-Events/Page-Resources/2026-News/110426-Water-Heater-Rule.
[11] *See e.g*. Decision ("D.") 21-05-031, *Assessment of Energy Efficiency Potential and Goals and Modification of Portfolio Approval and Oversight Process*, p. 72 (Findings of Fact 14).

caps,[12] MCE does not believe the Commission is authorized to reduce portfolio budgets or segmentation budgets mid-portfolio.[13] Reducing portfolio budgets mid-cycle undermines the very ethos and architecture of the rolling portfolio process.[14] Further, it diminishes the critical first in the loading order energy planning, reliability and affordability values of EE programs.[15] If the Commission provides a process for PAs to request significant fund changes, it must use the authorized budget from this proceeding as a floor and not a ceiling.

2. *Is equity segment funding from each applicant, individually and/or collectively, sufficient to achieve the Commission's policy objectives for the equity segment? Please provide quantitative and qualitative explanations for your response.*

MCE believes it is premature to draw precise conclusions on the sufficiency of Equity segment funding across the portfolios; however, the ongoing affordability crisis suggests more Equity focused funding is justified and aligned with Commission goals.

MCE strongly supports the Equity segment as a vital pathway to advancing the Commission's policy objectives including its *Environmental and Social Justice Action Plan*.[16] Advancing energy equity is key to MCE's mission and central to how MCE approaches all EE program design and delivery for its increasingly diverse and growing customer base.[17] In this Application and its previous Application for 2024-2027, MCE continues to maximize its investment in Equity programs.[18]

[12] MCE, Exh. MCE-01, pp. 178-188.
[13] *Id*.
[14] D.21-05-031, p. 28; D.21-05-031, Ordering Paragraph 4.
[15] *See e.g.* Public Utilities Code § 454.5(b)(9)(C); Public Resources Code § 25301.
[16] CPUC, *Environmental and Social Justice Plan (Vol 2.)*, (April 2022) available at: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/news-office/key-issues/esj/esj-action-plan-v2jw.pdf.
[17] MCE, About Us, *Our Purpose*, available at: https://mcecleanenergy.org/about/ (MCE Vision, MCE Mission).
[18] *See e.g.* MCE, MCE Advice Letter ("AL") 91-E, p. 8; MCE, Exh. MCE-01, pp. 89-92.

The policy objectives for the Equity segment are "[p]rograms with a primary purpose of providing energy efficiency to hard-to-reach or underserved customers and disadvantaged communities in advancement of the Commission's Environmental and Social Justice (ESJ) Action Plan; Improving access to energy efficiency for ESJ communities, as defined in the ESJ Action Plan, may provide corollary benefits such as increased comfort and safety, improved indoor air quality, and more affordable utility bills, consistent with Goals 1, 2, and 5 in the ESJ Action Plan."[19] Goals 1, 2 and 5 of the ESJ Action Plan strengthen equity in Commission regulatory activities, increase beneficial investments in ESJ communities and improve equity in Commission proceedings respectively.[20] The ESJ Action Plan defines ESJ communities using a variety of important criteria.[21] The Commission limits Equity and Market Support segment budgets collectively at a 30 percent budget cap.[22] The Commission has not set a floor for Equity segment spending across the portfolios. Relatedly, the Commission has not quantified how many ratepayers fulfill the ESJ Communities, hard-to-reach, underserved customers and disadvantaged communities' definitions.

Absent quantification of the number of Equity segment eligible customers compared to a guaranteed amount of Equity segment spending, it's premature to make precise conclusions on the sufficiency of Equity segment funding across the portfolios. However, the ongoing energy affordability crisis suggests more Equity focused funding is justified and aligned with Commission goals.[23] As the Affordable Energy Campaign explained, "Families are choosing between energy

[19] D.21-05-031, pp. 14-15.
[20] CPUC, *ESJ Action Plan*, pp. 4-5.
[21] *Id*. at 2.
[22] D.21-05-031, p. 23; D.23-06-055, p. 13.
[23] CPUC, *2026 Senate Bill 695 Report*, (October 2026), p. 3 available at: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2026/2026-sb-695-report---final.pdf ("Residential Average Rate is expected to continue increasing above inflation through 2029…").

and essentials."[24] In its Application, MCE argued the Commission should allow Community Choice Aggregator ("CCA") PAs to adjust Equity segment budget caps in support of greater energy affordability and energy equity.[25] MCE argued it should be allowed to submit and receive 35% of its budget on Equity segment customers because 41 percent of its customers are eligible for the Equity segment.[26] MCE requests the Commission consider proportional requests for Equity funding beyond the 30 percent budget cap to further advance the goals of the Equity segment. WestLight Energy ("WestLight") similarly requested the Commission allow PAs to submit proportional requests for Equity segment funding and explained, "This approach aligns funding levels with demonstrated community need and supports attainment of Equity Segment objectives."[27] Equity segment populations and their corresponding needs vary tremendously across the state. The Commission should allow locally rooted PAs to make the case for greater Equity segment funding in their portfolios.

MCE was deeply engaged in the Market Rate Equity Segment Non-Energy Benefits ("NEBs") Working Group to in inform the *Non-Energy Benefits for Market Rate Equity Segment Programs in California Handbook* ("Handbook") released in November 2026.[28] Following its participation and review of the Handbook, MCE believes reporting on NEBs within the Equity segment will provide additional vital information to evaluate the sufficiency of Equity segment program funding. Equity segment NEBs reporting is currently scheduled to begin in 2028.[29]

[24] Affordable Energy Campaign, *California's Energy Affordability Crisis*, available at: https://www.affordableenergycampaign.org.
[25] MCE, Exh. MCE-01, pp. 175-178.
[26] *Id*.
[27] WestLight, WestLight Application, Exh. WestLight-01, pp. 10-18 - 10-21.
[28] E Source, *Non-Energy Benefits for Market Rate Equity Segment Programs in California: Handbook*, (November 2026), available at: https://pda.energydataweb.com/#!/documents/5406/view.
[29] *Id*. at p. 5.

3. *Southern California Edison Company proposed allowing consolidation of program delivery types into sales based or customer based. Describe considerations that would impact consolidating program delivery types in this or any other manner, including but not limited to: cost effectiveness calculations, impact to operational costs, generation and measurement of total system benefit (TSB), incentive design, delivery expectations, impact on contractor delivery of services, portfolio simplification, etc.*

MCE generally supports strategies for effective streamlining of program administration and reporting. The complexity of program administration and reporting can add avoidable costs to portfolios and increase customer confusion. MCE submits no specific comments on Southern California Edison's proposal to consolidate program delivery types into sales based or customer based. However, MCE submitted its own related policy recommendation to simplify the definition of an EE program to similarly reduce avoidable administrative costs and customer confusion.[30] MCE reserves the right to submit additional information in Rebuttal Testimony.

4. *Southern California Gas Company proposed to allow portfolio administrators to consolidate programs with common strategies into a single program and implementation plan that can cross segments. Please address potential considerations for these unified delivery structures, including but not limited to: third-party delivery, cost-effectiveness, flexibility, innovation, vendor concentration, segmentation, procurement, and other relevant topics.*

MCE sees conceptual merit in allowing greater organization of programs with common strategies that may cross segments into one program and implementation plan. This importantly can reduce administrative complexity for reporting and correspondingly customer confusion. As stated above and in a variety of its Application policy recommendations, MCE recommends the Commission update the California Energy Database Reporting Systems ("CEDARS") to be more customer and public facing.[31] The lens for reporting should center what would be useful for and accessible to the legislature,[32] members of the public and customers interested in EE programs. In

[30] MCE, Exh. MCE-01, pp. 188-190.
[31] MCE, Exh. MCE-01, pp. 188-193.
[32] AB 3264 (Petrie-Norris), sec. 1(b), 3(b).

this instance, the one segment per program rule requires a PA to report what may function as one program as multiple programs. This adds unnecessary complexity to reporting which can operationally limit oversight of EE programs by parties outside the Commission and a customer's participation in programs.

5. *For third party program definition changes or any percent changes recommended:*

a. Describe the impacts on investor-owned utility portfolios, including but not limited to: third-party program performance; offerings across sectors; cost effectiveness; diversification of bidders; allocation of performance and other risk; opportunities for innovation; TSB generation; and/or equity and market support outcomes.

b. Please identify and describe any alternative methods to using a minimum budget percentage to ensure third party delivery of energy efficiency programs. Are there other performance criteria that should be used to demonstrate compliance? Should a minimum budget percentage apply to all sectors the same way?

As stated in its Application and Supplemental Testimony, MCE is not subject to third-party solicitation requirements and does not provide further comment at this time.[33]

6. *Should all portfolio administrators use a single definition of Equity Targeted Customer – instead of using Hard-to Reach, Disadvantaged Communities, and Underserved? If so, what are the criteria that should be included in that definition so that it can be efficiently and effectively operationalized? If not, should any of the current definitions for Hard-to-Reach, Disadvantaged Communities, or Underserved be adjusted, and if so, how?*

In its Application, MCE refers to all categories of customers eligible for its proposed Equity segment programs using the umbrella term "Equity customers." MCE defines "Equity customers" as residential customers and businesses in ESJ communities.[34] MCE defines ESJ communities pursuant to the *ESJ Action Plan* discussed above.[35] MCE sees potential value in the Commission defining all customers eligible for the Equity segment as "Equity customers" across the portfolios.

[33] MCE, Exh. MCE-04, pp. 10-11.
[34] MCE, Exh. MCE-01, pp. 38-39.
[35] CPUC, ESJ Action Plan, p. 2.

An umbrella identification term can support more transparent reporting on Equity segment program participation, and assessment of progress on Equity segment goals.

Consistent with its Application, MCE does not submit specific refinements to the definitions of hard-to-reach, underserved and disadvantaged communities. MCE is not opposed to expanding Equity subcategory or customer definitions.[36] However, MCE believes updates to Equity definitions should be deeply informed by Equity customers themselves and their advocates.[37] MCE recommends the Commission explore any potential Equity definitional refinement with the guidance of stakeholders within ESJ communities, the California Energy Efficiency Coordinating Committee and the Disadvantaged Community Advisory Group.[38] Generally, the Commission must balance its interest in administrative efficiency with the diverse needs of Equity customers across the state consistent with Goal 5 of its *ESJ Action Plan*.[39]

a. What level of stringency is appropriate for portfolio administrators in determining who qualifies as an Equity Targeted Customer? How much flexibility should portfolio administrators have in making a determination?

MCE recommends the Commission follow the existing process where PAs propose Equity programs, strategies and Implementation Plans in its Application including eligibility. These proposals are subject to public review and comment in the Application proceeding. If programs are approved then PAs administer them subject to controlling Implementation Plan and

[36] MCE, Exh. MCE-01, p. 125.
[37] *Id*.
[38] California Energy Efficiency Coordinating Committee, available at https://www.caeecc.org/; CEC, DACAG, available at: https://www.energy.ca.gov/about/campaigns/equity-and diversity/disadvantaged-communities-advisory-group-dacag ("The DACAG is an 11-member advisory group created by Senate Bill 350 (de León, Chapter 547, Statues of 2015).
[39] CPUC, *ESJ Action Plan*, pp. 43-45 ("Goal 5: Enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC's decision-making process and benefit from CPUC programs.").

Commission rules and processes. MCE is unaware of any presented factual evidence significant enough to justify different or more stringent Equity segment eligibility constraints.

MCE supports the use of self-attestation for identifying eligible low-income customers for the Equity segment. MCE supports limiting the income verification burdens for program participants as complex income verification requirements often result in the exclusion of low-income program participants.[40] MCE uses self-attestation for its Home Energy Savings Equity ("HES-E") program with great success. MCE observes several programs including, but not limited to the California Alternate Rates for Energy ("CARE") energy bill discount program[41] and the Family Electric Rate Assistance Program ("FERA") energy bill discount program[42] also successfully use self-attestation to establish income eligibility and selective post-enrollment verification processes. Beyond energy programs, Medi-Cal and Covered California both accept self-attestation of income to demonstrate eligibility for low-income participants via a written statement.[43]

[40] Disadvantaged Communities Advisory Group, *Re: Comments on Rulemaking 20-05-012 Assigned Commissioner's Ruling (ACR) on Improving Self Generation Incentive Program Equity Outcomes and Assembly Bill 209 Implementation*, available at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M499/K629/499629300.PDF at p. 2 ("Where providing proof of income and/or residing in deed-restricted housing are necessary to qualify for participation, these conditions often result in unnecessary barriers to participation. Consider enabling self-attestation of income to reduce these barriers, which can be verified through random audits of a small subset of customers, or at a minimum enable customers who qualify for CARE or FERA to participate without additional paperwork."

[41] PG&E, *CARE Program*, available at: https://www.pge.com/en/account/billing-and-assistance/financial-assistance/california-alternate-rates-for-energy-program.html.

[42] PG&E, *FERA Program*, available at: https://www.pge.com/en/account/billing-and-assistance/financial-assistance/family-electric-rate-assistance-program-fera.html.

[43] Department of Health Care Services, *Medi-Cal*, available at: https://www.dhcs.ca.gov/Get-Medi-Cal/Pages/confirm-eligibility.aspx (case by case basis for those that may lack proof of income and/or receive cash wages); Covered California, *Attestation of Income, No Documentation Available*, available at: https://www.coveredca.com/pdfs/Attestation-Form-Income-No-Documentation-Available-English.pdf.

For the geographic eligibility criteria for the Equity segment, MCE supports the use of the CalEnviroScreen tool[44] and census data to identify disadvantaged communities.[45] Additionally, MCE uses a "Neighborhood Approach" strategy that prioritizes Equity customers via a community campaign model.[46]

b. Should the definition of Equity Targeted Customer take into account the number of projects (direct install/incentive) that have historically been implemented in certain communities? If so, how? If not, why?

MCE supports the definition of Equity customer offered above as residential and businesses in ESJ communities. MCE sees the value in analyzing and potentially reporting on the number of projects (direct install/incentive) historically implemented in certain communities. This information is one piece of data that may help demonstrate Equity segment customer eligibility. Further, MCE is committed to serving all its service area with community-led programs and offerings. Seeing the penetration rate of its EE installations and rebates can be helpful information to guide the equitable implementation of programs and access to their benefits.

However, this EE program deployment data point alone is insufficient to demonstrate eligibility for an Equity segment, alignment with Equity segment goals, and Commission objectives. Some communities may have more customers with greater eligibility for Equity programs than other communities. Finding a greater number of direct-installs or rebates in a community where more customers are eligible for the Equity segment is not necessarily evidence of inequitable program implementation. It can instead indicate where Equity eligible customers are concentrated. Continuing to serve communities with higher concentrations of Equity customers with Equity programs may instead demonstrate greater alignment between PA implementation

[44] Office of Environmental Health Hazard Assessments, *CalEnviroScreen Disadvantaged Community*, https://oehha.ca.gov/calenviroscreen.
[45] MCE, Exh. MCE-01, p. 49.
[46] MCE, Exh. MCE-01, p. 122.

actions and Commission Equity objectives. MCE also uses a neighborhood and community approach in implementing its Equity programs.[47] These localized approaches strengthen community trust, promote program awareness, and foster long-term participation. These approaches are a geographically focused investment of time and resources required to build trust and successful program implementation. MCE discourages requiring strict geographic quotes for the Equity segment because it fears those will frustrate the equitable implementation of programs. MCE discusses its Equity segment strategies in greater detail in its Application.[48]

c. Should the Commission consider the potential population size of Equity Targeted Customers in determining the appropriate definitions? If so, how? If not, why?

MCE outlined its Equity customer definition above. MCE does believe the population size of Equity segment customers in a service area is relevant when determining the Equity segment budget. MCE requested an Equity segment budget cap proportional to its Equity segment customer eligible service area population.[49]

7. *Does allowing fuel switching measures (with no energy savings from regulated fuel sources):*

a. Align with the statutory authority and legislative intent of the Commission's energy efficiency policies? Please explain.

Yes, allowing fuel switching measures with no energy savings from regulated fuel sources aligns with the Commission's statutory authority and policies on EE. The Commission's statutory authority for its oversight of EE programs stems from Public Utilities Code section 381 on the Public Purpose Charge:

"The commission shall allocate funds collected pursuant to subdivision (a), and any interest earned on collected funds, to programs that enhance system reliability and provide in-state benefits as follows:

[47] MCE, Exh. MCE-01, p. 49.
[48] *Id*., pp. 116-126.
[49] MCE, Exh. MCE-01, pp. 175-178.

(1) Cost-effective energy efficiency and conservation activities.
(2)Public interest research and development not adequately provided by competitive and regulated markets.
(3)In-state operation and development of existing and new and emerging eligible renewable energy resources, as defined in Section 399.12."[50]

As the Commission explained in D.21-05-031 section 381 requires them to fund cost-effective energy efficiency, but does not prohibit the funding other aligned investments, "…we clarify that the provisions of § 381(b)(1) represent a budget "floor," requiring that the Commission must ensure that all cost-effective energy efficiency receives investment, but not that this is a limitation on the Commission requiring additional energy efficiency expenditures, where warranted."[51] Provided the Commission continues to fund cost-effective energy efficiency activities, they are permitted to similarly fund other policy aligned investments with Public Purpose Program funds.

As D.21-05-031 continues, "The Commission is still free to exercise its judgement and fund energy efficiency and conservation investments that go beyond the budget "floor" required by the cost-effectiveness standard in § 381(b)(1) if they provide value to ratepayers, even if the costs may sometimes exceed the measurable benefits."[52] These alternative investments must provide value to ratepayers and advance other complementary policy drivers. In this instance, beneficial fuel switching measures that reduce greenhouse gas emissions, reduce criteria air pollutants especially in overburdened ESJ communities and that provide access to important non-energy benefits like improved health, safety and comfort are aligned with California's controlling climate and energy policies.[53]

[50] Public Utilities Code section 381.
[51] D.21-05-031, p. 20.
[52] *Id*.
[53] Senate Bill 100 (De León), 2018 sec 2(b)(3) ("Reducing air pollution, particularly criteria pollutant emissions and toxic air contaminants, in the state."); sec 5(b)(3)("To the extent feasible and authorized under law, lead to the adoption of policies and taking of actions in other sectors to obtain greenhouse gas emission reductions that ensure equity between other sectors and the electricity sector.

b. Offer equity, grid, or other system level benefits in addition to greenhouse gas benefits? Please describe.

Yes. As discussed in the recent California Energy Efficiency Coordinating Committee Hot Topic Discussion: Fuel Switching meeting in September 2026, fuel switching and fuel substitution measures can deliver a variety of affordability, reliability, equity, greenhouse gas reduction and non-energy benefits especially for rural, hard-to-reach and other ESJ community customers.[54]

c. Is the existing Avoided Cost Calculator (ACC) sufficient for valuing fuel switching measures? Why or why not? If not, how should the Commission value fuel switching measures?

MCE reserves its right to respond to this question in its Rebuttal Testimony.

8. *If the Commission authorizes energy efficiency funding for fuel switching, please address the following:*

a. Should there be any caps, limitations, or targets? If so, describe.

b. What are the likely consequences to rates (electric (kilowatt-hour and kilowatt) and gas (therm)) for relevant customer classes based on likely uptake and potential market size? To what extent will ratepayers' bills be impacted? Where?

c. Should the Commission assess the costs and benefits of fuel switching in the same manner as energy efficiency and fuel substitution? If not, what differences should there be and why? Describe how your proposal would be operationalized and include whether and how treatment of electric and gas avoided costs should be assessed.

d. Given that the baseline fuel in fuel switching is unregulated, how should this be considered in potential cost-effectiveness, and are there fuel switching-specific considerations for how to measure reductions in delivered fuel use?

MCE reserves its right to respond to this question in its Rebuttal Testimony.

9. *What, if any, considerations should the Commission make in future potential and goals decisions if energy efficiency funding for fuel switching is authorized?*

MCE reserves its right to respond to this question in its Rebuttal Testimony.

[54] CAEECC, 9/23/2026 Full Quarterly CAEECC Meeting #51, Redlined Slides (September 2026), Slides 42-55, available at: https://www.caeecc.org/_files/ugd/849f65_181d224992b5490fbe9bccee0ec15ec6.pdf.

10. *Would allowing measures with no energy savings, such as low-GWP measures, to claim TSB:*

a. Align with the statutory authority and legislative intent of the Commission's energy efficiency policies? Please explain.

Yes, allowing low-GWP measures with no energy savings in the EE portfolios aligns with the Commission's statutory authority and policies on EE. As MCE discussed in its Application, the Commission is required to incorporate low-GWP measures into the EE portfolio by statute.[55] Senate Bill 1013 (Lara, 2018) requires the Commission to "consider developing a strategy for including low-GWP refrigerants in equipment funded by the energy efficiency programs overseen by the Public Utilities Commission." Following Senate Bill 1013, in D.21-05-031 the Commission directed PAs to develop "[p]rograms that encourage the use of lower-GWP refrigerants than current 'standard practice' or regulation" and "encourages the program administrators to seek out all cost-effective opportunities to incorporate low-GWP measures in the energy efficiency portfolios."[56] Absent a TSB value and claims process, PAs may not meaningfully integrate low-GWP measures into the portfolios in compliance with SB 1013 and D.21-05-031.

b. Offer equity, grid, or other system level benefits in addition to GHG benefits? Please describe.

Yes. While the predominant benefit of low-GWP measures is greenhouse gas emissions reductions, through intentional program design and implementation, PAs could deploy low-GWP measures to Equity customers for greater Equity benefits.

As there is an incremental cost associated with some low-GWP technologies (such as a CO2 Heat Pump Water Heater which can range from $2,500 to $3,500 higher than its non-low-

[55] MCE, Exh. MCE-01, pp. 5, 57-58, 64, 100.
[56] D.21-05-031, pp. 53, 60.

GWP equivalent),[57] incorporating low-GWP measures into an Equity strategy or program would increase Equity customer access to beneficial technology investments in advancement of ESJ Action Plan "Goal 2: Increase investment in clean energy resources to benefit ESJ communities, especially to improve local air quality and public health."[58] Additionally, depending on the customer, their climate, usage profile and specific low-GWP technology deployed, low-GWP measures can provide long term affordability benefits to customers.[59]

c. Is the existing ACC sufficient for valuing low-GWP measures with no energy savings? Why or why not? If not, how should the Commission value low-GWP measures if allowed?

A refrigerant value exists in the current ACC for valuing low-GWP measures. MCE finds this value presently satisfactory, but recommends continual improvement to align with evolving technologies and conditions.

11. *How can portfolio administrators determine when right sizing/power-efficient design/optimization measures (lower-cost measures like meter socket adaptor, smart splitters, or other load management devices) are effective, or when panel upsizing/upgrade/replacement (a new, higher amp panel) is needed?*

MCE supports electrification in the EE portfolios and offers robust electrification measures in its existing portfolio.[60] MCE welcomes additional information from PAs and parties in this proceeding to consider. MCE does not presently request any specific portfolio rule changes related

[57] *See e.g.* Better Water Heaters, *CO2 Heat Pump Water Heater vs. R-134a: Best Bay Area Choice*, available at: https://betterwaterheaters.com/co2-vs-r134a-refrigerant-heat-pump-comparison.
[58] CPUC, *ESJ Action Plan*, p. 5.
[59] Better Water Heaters, *CO2 Heat Pump Water Heater vs. R-134a: Best Bay Area Choice*, available at: https://betterwaterheaters.com/co2-vs-r134a-refrigerant-heat-pump-comparison ("**Is a CO2 heat pump water heater worth the extra cost?** For many Bay Area homeowners, yes. While the upfront cost is higher, the efficiency in cold micro-climates and the immunity to future refrigerant regulations provide better long-term value. According to Energy.gov, heat pumps can save a household hundreds per year on utilities, and CO2 models offer the highest recovery rates for large families.").
[60] *See e.g.* MCE, Exh. MCE-01, pp. 29-38.

to right-sizing or upsizing panels. MCE reserves its right to respond to this question in its Rebuttal Testimony.

12. *How should right-sizing measures (meter socket adapters, smart splitters, and any other load management device) be considered in cost-effectiveness and measurement of program attribution (net-to-gross)?*

MCE supports cost-effective electrification in the portfolios and offers electrification measures in its current portfolio's Resource Acquisition segment and Equity segment programs.[61] MCE welcomes additional information from PAs and parties in this proceeding to consider. MCE does not presently request any specific portfolio rule changes related to right-sizing or upsizing panels. MCE reserves its right to respond to this question in its Rebuttal Testimony.

13. *Pacific Gas and Electric Company proposed to allow portfolio administrators to continue using energy efficiency funding for ongoing load shifting either for Program Years 2028 through 2031 or until the Commission authorizes load shifting activities in another proceeding as a more appropriate long-term venue. Under this approach, what criteria should the Commission use to determine when, how, and in what instances to discontinue energy efficiency funding for load shifting activities? Please describe considerations on size and reach of load shifting activities in other proceedings, as well as potential use of dynamic rates.*

MCE strongly supports funding load shifting and integrated demand side management ("IDSM") in the portfolios to advance progress on California's serious reliability, and affordability needs.[62] California cannot presently afford to leave cost-effective reliability strategies on the table.[63] MCE understands the conceptual benefit of organizing all reliability strategies in one venue and generally supports greater organization of load flexibility issues within the Commission.

[61] *Id*. at pp. 29-38, 58-59, 95.
[62] American Council for an Energy-Efficient Economy, *ENABLING INDUSTRIAL DEMAND FLEXIBILITY: ALIGNING INDUSTRIAL CONSUMER AND GRID BENEFITS*, p. 5 (February 2024), available at: https://www.aceee.org/sites/default/files/pdfs/enabling_industrial_demand_flexibility aligning_industrial_consumer_and_grid_benefits.pdf.
[63] CEC, *Staff Report: California Energy Resource and Reliability Outlook*, 2025, p. 108 (July 2025), available at: https://www.energy.ca.gov/publications/2025/california-energy-resource-and-reliability outlook-2025 ("Electricity Demand: California's electricity demand continues to rise, peaking in summer. The 2024 IEPR Update forecasts a coincident peak of nearly 46,000 MW for the California ISO in summer 2025.").

However, California urgently needs reliability solutions today and any other venue or pathway will likely take years to effectively launch. Additionally, MCE wishes to continue administering an IDSM program as a CCA, and believes that non-investor owned utility program administrators (IOUs) play a critical role in supporting reliability and load flexibility The present Demand Response portfolios presently prohibit non-IOU program administration.[64] For those reasons, in its Application, MCE requested the Commission continue IDSM funding in in the EE portfolios in program years 2028-2031 and beyond.[65] MCE additionally requested the Commission fund its proposed IDSM program the Peak Flex Market to create additional cost-effective value for its customers and the grid.[66]

3: Conclusion

MCE respectfully submits this Opening Testimony and requests the Commission to approve its Application. MCE thanks the Commission, Commissioner Douglas and Administrative Law Judge Kao and Administrative Law Judge Fitch for the opportunity to submit Opening Testimony and respond to specific Ruling questions. MCE looks forward to working with the Commission and all parties on supporting the continued evolution of beneficial EE and IDSM program.

[64] *See e.g.* D.23-12-005, Ordering Paragraphs 1-10.
[65] MCE, Exh. MCE-01, pp. 196-197.
[66] MCE, Exh. MCE-01, pp. 99-100; Exh. MCE-02, pp. 34-36.

MARIN CLEAN ENERGY

OPENING TESTIMONY OF MARIN CLEAN ENERGY REGARDING

ITS 2028-2031 ENERGY EFFICIENCY PORTFOLIO PLAN AND

2032-2035 ENERGY EFFICIENCY BUSINESS PLAN AND

ADMINISTRATIVE LAW JUDGE'S RULING SEEKING RESPONSES TO SPECIFIC

QUESTIONS IN OPENING TESTIMONY

EXHIBIT 5

ATTACHMENT A

WITNESS RESUMES

Alice Havenar-Daughton
Vice President of Customer Programs, MCE
1125 Tamalpais Ave, San Rafael, 94901

RELEVANT SKILLS AND EXPERIENCE

- Strong background in energy efficiency, with experience in program design, implementation, and evaluation.
- Oversees implementation of energy programs with over $20 million annually in the Marin Clean Energy service territory.
- Oversaw program launch of MCE's first low-income multifamily energy efficiency program, the Low-Income Family and Tenants (LIFT) Pilot Program.

EDUCATION

American University, Washington DC, *2010*
M.A. Natural Resources and Sustainable Development
McGill University, Montreal, Canada, *2005*
B.SC. Architecture

WORK EXPERIENCE

MCE San Rafael, CA, *2023 – Present*
Vice President of Customer Programs

MCE San Rafael, CA, *May 2018 – 2023*
Director of Customer Programs

- Oversees MCE's portfolio of customer programs, including energy efficiency, transportation electrification, low-income solar.
- Represents MCE externally in stakeholder forums such as California Energy Efficiency Coordinating Committee (CAEECC) and CalTF, and through speaking engagements.
- Lead the development of a new program data tracking tool for program performance and streamline reporting.

MCE San Rafael, CA, *June 2017 – April 2018*
Manager of Policy and Planning, Customer Programs

- Oversees planning for Demand Side Resource Pilot Programs, including, electric vehicles, fuel switching and low-income solar.
- Works collaboratively with MCE's Regulatory Team to develop the strategy for MCE's engagement with the California Public Utilities Commission (CPUC) in the Business Plan Application process, including developing content for filings, drafting

talking points, engaging with partners and 1 serving as MCE's representative to the CAEECC.

- Manages MCE's EM&V budget for Energy Efficiency Programs and LIFT.
- Oversees all Energy Efficiency and LIFT program reporting to the CPUC.
- Manages MCE's SF Seasonal Savings Program, the California Energy Commission (CEC) BEO Grant and grant compliance for the electric vehicle charges owned by MCE.

MCE San Rafael, CA, *October 2015 – June 2017*

Energy Efficiency Program Manager

- Managed MCE's Single-Family Energy Efficiency Program.
- Managed all energy efficiency programs reporting to the California Public Utilities Commission.
- Supported MCE's Business Plan Application through sector chapter development, managing cost effectiveness work done by consultants and leading the internal program logic model and metrics development.
- Represented MCE through engagement and comments on several CPUC-funded EM&V studies of MCE's programs.

MCE San Rafael, CA, *July 2014 – October 2015*

Energy Efficiency Specialist

- Developed tracking systems for MCE's Energy Efficiency program expenditures and savings.
- Represented MCE at the Reporting Program Coordination Group at the CPUC.
- Tracked data and prepared monthly, quarterly and annual reports for the CPUC. Provided data necessary for other compliance requirements.

Opinion Dynamics Corporation Oakland, CA, *November 2010 – July 2015*

Senior Analyst

- Served as a lead analyst on process and impact evaluations of energy efficiency and demand response programs in California and across the county.

Alliance for Climate Protection Washington, DC, *May 2010 – September 2010*

Solutions/Policy Team Fellowship

- Analyzed national climate and energy legislation to support renewable energy advocacy effort.

American Council for an Energy Efficient Economy (ACEEE) Washington, DC, *January 2010 – April 2010*

Buildings Team Intern

- Conducted research on barriers to energy efficiency in building codes.

Energetica Cochabamba, Bolivia, *August 2008 – May 2009*

Research Assistant

- Conducted a study on the potential for solar water heaters in urban areas of Bolivia which supported the initiation of a new solar water heater project, Proyecto ElSol.
- Assisted in rural educational workshops for subsidized solar panel recipients.

Jennifer Green
Director, Energy Efficiency and Building Decarbonization, MCE
1125 Tamalpais Ave. San Rafael, CA 94901

RELEVANT SKILLS AND EXPERIENCE

- Over 20 years experience with California energy efficiency policy, regulatory, legislative environment; energy program design, execution, and evaluation; government program design, implementation and reporting.
- Management of MCE's residential and Workforce Education & Training energy efficiency and decarbonization program design, implementation, and reporting.
- Strong commitment to and experience with diversity, equity and inclusion in MCE residential programs and workforce development initiatives.
- Developed and managed municipal energy programs for the City of San Diego.
- Originated and managed a multi-year, multi-partner contract that resulted in: 200+ in-home water and energy consumption assessments.

EDUCATION

San Diego State University, San Diego, CA, 2008, Master of Arts, Public Policy and Political Science

California State University, Sacramento, 1993, Bachelor of Arts, Journalism

Building Performance Institute, New York, 2015, Building Analyst and Envelope Certification

WORK EXPERIENCE

MCE San Rafael, CA, January 2026 – *Present*

Director, Energy Efficiency and Building Decarbonization

MCE San Rafael, CA, *2019 – 2026*

Manager of Customer Program

- Program design and management of MCE's residential energy efficiency, WE&T and decarbonization portfolio implementation, serving multifamily and single family residential sectors and energy industry workforce.
- Management of MCE's residential energy efficiency equity and general market teams, including California Public Utilities Commission (CPUC) and MCE-ratepayer funded programs.

Center for Sustainable Energy (CSE) *2005-2013, 2016-2018*

Senior Manager, Distributed Energy Resources

- Led and executed municipal contract projects for California jurisdictions to enact climate change goals, including development, implementation and evaluation of:

    - Program and project proposals, negotiations, and contract management;
    - Detailed program budgets and true-ups from program inception to evaluation;
    - Reporting to CPUC, California Energy Commission, municipal and regional governments.
- Developed and managed proposals for distributed generation, renewables, and energy efficiency programs, including outreach and education, technical skills and quality assurance with local and state industry and municipal partners.
- Built municipal partnerships, staff support for commercial real estate construction, and contractor industry-focused municipal working groups.
- Fostered external energy policy, regulatory, and business partnerships.
- Presented to local, state, regional, business, utility audiences on energy demand side management, distributed generation, and policy/regulatory issues.

Policy and Legislative Manager

- Formulated organizational position documents on renewables, distributed generation, and energy efficiency programs for state and local decision-makers.
- Fostered relationships and collaborations with local and state governments, renewables, distributed generation, and demand side management.
- Developed energy legislative and policy forums with local and statewide elected officials.
- Staffed a regional energy working group with business, advocacy and municipal members.

Gammage and Green, LLC *2014-2016*

Owner, Home Energy Rating Service (HERS) Rater

- Developed and managed all financial, marketing, client procurement and engagement, and sustainability efforts for emerging HERS rater company.
- Presented Building Performance Institute rater training curriculum to contractor industry professionals.
- Provided technical support to contractors to ensure compliance with California building standards.
- Performed over 300 HERS verifications.

San Diego Regional Chamber of Commerce *2004-2005*

Policy Manager

- Managed regional energy policy, transportation and small business advocacy committees consisting of leading businesses, advocacy groups, and municipal members in San Diego's regional business organization.
- Provided analysis to internal/external audiences on energy, transportation, and small business issues.

San Diego State University *2001-2004*

International Admissions Manager

Alex J. Valenti
Manager of Customer Programs, MCE
1125 Tamalpais Ave. San Rafael, CA 94901

Work Experience

Manager of Customer Programs, MCE, *San Rafael, CA* 2021-Present

Lead a team of Program Managers and provide strategic leadership across a diverse portfolio of Commercial and Industrial energy efficiency programs. Includes program design, procurement, contract management, CPUC regulatory compliance, quality assurance, and a holistic management approach.

Account Executive, Siemens, *Richmond, CA (home office)* 2015-2021

Team leader in developing demand and supply side energy projects; including HVAC, lighting, solar and battery storage. Managed the process of creating high value solutions and proposals, which included financial analysis, technical writing, price estimating, contract negotiation, and presentation to customers. Secured over $40 Million of public sector projects during this time.

Senior Energy Engineer, Siemens, *Novato, CA* 2014-2015

Provided technical design and engineering for municipal LED streetlight retrofit projects. This included lighting design, material specification, GIS data management, estimating, cost benefit analysis, and financial modeling. Provided subject matter expertise, facilitating project details to customers. Monitored market trends, evaluating emerging technologies and new manufacturers.

Project Manager, Energy Solutions, *Oakland, CA* 2013- 2014

Managed multiple energy efficiency incentive projects focusing on interior and exterior lighting design. This included client communication, budget development, technical reporting and contractor coordination. Provided technical engineering services for comprehensive municipal lighting projects, including comprehensive energy audits, lighting design and economic modeling. Participated in the development of California Title 24 building efficiency codes and supported California IOU participation in Federal appliance standards development.

Research Associate, Lawrence Berkeley National Laboratory, *Berkeley, CA* 2012-2013

Gathered and synthesized market data in establishing federal efficiency standards for commercial and residential lighting products. This included technical literature review, market analysis, economic modeling and data management. Authored and edited complex technical documents based on research findings for the U.S. Department of Energy and The Handbook of Energy Efficiency and Renewable Energy.

Environmental Consultant, J. Stanley Consulting, *Oakland, CA* 2008-2012

Implemented Federal and State environmental protocols for building demolition and renovation projects. Provided project management, contractor oversight, scheduling, and technical writing. Performed residential, commercial and industrial building assessments to identify hazardous materials. This included knowledge of building construction, permitting, field documentation and test procedures. Authored technical reports and remediation plans.

EDUCATION

Leadership Essentials *Cornell University*

Project Management Fundamentals Certificate *San Francisco State University*

B.S. Environmental Sciences & Minor Energy and Resources *University of California, Berkeley*