

9/16/2024

Redwood Coast Energy Authority 633 3rd Street Eureka, CA 95501

RE: Proposal for RFP-24-601

Dear Patricia Terry and the Selection Committee,

Frontier Energy, Inc. (Frontier) welcomes this opportunity to submit our proposal in response to Redwood Coast Energy Authority's (RCEA's) request for administrative support services for the Rural Regional Energy Network North (RREN-North).

Our team is well-qualified and prepared to apply our relevant expertise in support of RREN-North, as described below and throughout our proposal:

- Familiarity and recent experience with RCEA: Frontier began working with RCEA in
  January 2020 and has provided technical and regulatory support including data tracking,
  advice letter (AL) filings, and quality assurance of savings claims. More recently, Frontier
  supported RCEA with initial coordination and creation of a template for Joint Cooperation
  Memoranda, as well as review and assistance with RREN's True-Up Advice Letter.
- 10+ years of REN consulting and \$461 Million secured for REN clients: Over the past decade, Frontier has worked with four RENs to secure a long-term role for local governments within the California Public Utilities Commission (CPUC) energy efficiency landscape. We support RENs with Business Plans, ALs, program administration, and ongoing regulatory consulting to grow their portfolios. In recent years Frontier played a key role in REN clients' business plans approved for \$291 Million through 2027, and an additional \$170 Million in budget forecasts approved through 2031.
- Unmatched expertise in CPUC reporting: For over a decade, Frontier has led the
  coordination, review, and submission of CPUC reporting on behalf of nine CPUC approved
  portfolio administrators (PAs), ensuring timely monthly, quarterly, and annual submissions
  in the California Energy Data and Reporting System (CEDARS). CPUC Energy Division staff
  look to Frontier to provide feedback on CEDARS updates on behalf of RENs and community
  choice aggregators and the newly appointed CEDARS consultants have reached out to our
  team for training and guidance on Normalized Metered Energy Consumption (NMEC)
  claims.
- Trusted voice for REN advocacy across Joint PA and stakeholder activities: Frontier is an active participant and vocal advocate for RENs in a multitude of stakeholder working groups and Joint PA meetings. Our team brings an unparalleled level of prior and current knowledge related to crucial ongoing stakeholder activities—in our observation, there is no other regulatory consulting firm who consistently attends and engages in all the stakeholder and Joint PA venues in which we participate.



• **Key partnerships:** In addition to REN regulatory support, Frontier brings expertise and key partnerships from our ongoing work in program implementation. Frontier will be providing contractor account management for the California Energy Commission Equitable Building Decarbonization direct install residential program in the Northern California region (EBD NorCal). Frontier is a key subcontractor on the team led by Association for Energy Affordability (AEA). The RREN-North region is one of the initial community focus areas for EBD NorCal, and the Frontier team is ideally positioned to serve as a conduit for coordination between the EBD NorCal team and RREN-North. Frontier has a long history of collaboration with AEA and other key partners for large statewide programs such as TECH Clean California, Quality HVAC, and the Self Generation Incentive Program (SGIP), and can advise regarding coordination with those programs to maximize benefits to RREN-North customers. Please see <u>Appendix C</u> for a letter of support for our proposal, provided by AEA.

Our team is more than happy to negotiate with RCEA to further tailor the scope of work and budget proposed to fit RCEA's needs. Frontier has no proposed revisions to RCEA's Standard Agreement.

We look forward to discussing this work with you and your team. Should you have questions regarding this response, please do not hesitate to contact us.

Sincerely,

Jean Krausse, Vice President Frontier Energy, Inc.

Ja Krausse



# Administrative Support Services for the Rural Regional Energy Network North

RFP-24-601

Revision 1 (REDACTED) - September 19, 2024





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Prepared for: **Redwood Coast Energy Authority** 633 3rd Street Eureka, CA 95501

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## A. Executive Summary

## General introduction and highlight of the Frontier team and approach

With over 40 years of experience, Frontier Energy (Frontier) has delivered energy efficiency (EE) solutions for residential, commercial, industrial, and public sectors across the U.S. Across the organization, Frontier employs nearly 200 individuals in offices and remote locations across the country, with broad and deep expertise across a wide variety of professional disciplines. Our expertise encompasses demand-side management (DSM), software development, building research and energy consulting, commercial foodservice efficiency, and transportation and power. Frontier provides the highest caliber of EE and engineering services, applying in-depth knowledge of emerging and established technologies to create exceptional solutions, customized to clients' needs and local conditions.

In California, technical and regulatory consulting to local governments has been and continues to be a highlight and major focus of our work. Our team serving California clients includes a dedicated staff of 28 employees specializing in technical and regulatory consulting and program implementation, with inter-disciplinary support available as needed from the nearly 170 other staff members across the broader organization.

Over the past ten years the Frontier team, led by Nancy Barba, has worked with (and in some cases continues to support) all the local governments who now form Southern California Regional Energy Network (SoCalREN), Bay Area Regional Energy Network (BayREN), Tri-County Regional Energy Network (3C-REN), and Inland Regional Energy Network (I-REN). We have been on the journey with them as they started EE programs under the American Recovery and Reinvestment Act and Energy Upgrade California, through the work to secure a long-term role for local governments within the California Public Utilities Commission (CPUC or Commission) ratepayer-funded EE programs.

The Frontier team works closely with clients, stakeholders, and the CPUC to ensure outcomes are optimized and client interests advanced. We are proud to be vocal advocates for local governments' involvement in EE and equity, across a significant number of stakeholder venues. Staff are adept at facilitating multi-party portfolio administration teams and have programmatic and regulatory experience in residential single family and multifamily, commercial, emerging technologies, workforce, codes and standards, public sector, and financing, with cross-cutting emphasis on serving equity customers and supporting markets for increasing access to EE.

This experience has provided insights, understanding, and a unique ability to navigate the complexities of operating a regional energy network (REN), and informs the effort we would undertake with RuralREN-North.

# Frontier's understanding of the project and approach to accomplish the work

Rural Regional Energy Network North (RREN-North) is unique from other RENs, in its geography, in its commitment to serving rural underserved and unserved communities, and in the circumstances of its beginnings as a REN.

Frontier understands that RREN-North faces a unique timing challenge in the  $\sim 17$  months ahead, with activities in quick succession (and in some cases, overlapping) as required to update the initial business plan before end of year, while preparing to launch programs, in tandem with looking ahead to the next business plan filing just shortly after launching its first portfolio.

In parallel, RREN-North will need to stay actively engaged with a multitude of new stakeholder activities described throughout our proposal, meant to ramp up in 2025 especially, to inform the next business plan filings and establish new requirements for 2028 and beyond. Many of these activities are of particular importance to REN portfolio administrators (PAs), as clearly indicated in Commission decision language.

Given these timing considerations, it is of paramount importance for RREN-North to have a skilled regulatory consultant who is familiar to Redwood Coast Energy Authority (RCEA) and already immersed in these activities so that the work can begin as immediately as possible following contracting. Frontier is that consultant.

Broadly, we propose an approach to the work requested by RREN-North that is flexible, complementary, and backed by years of experience delivering regulatory consulting to RENs.

- **Flexibility**: the very nature of regulatory work is that in addition to the many requirements and guidance that are established and well-understood, there will always be new regulations on the horizon—some which can be anticipated in advance, and some that are more difficult to predict in detail. Stakeholder processes in particular can change direction quickly. Even during the timeframe to produce this proposal, we have seen examples of this occurring. Supporting our clients with regulatory work requires diligent attention to monitoring and preparation for future changes while remaining nimble to react to sometimes daily or even hourly changes. We strive to maintain flexibility in our team and our approach to achieve that balance.
- **Complementarity**: local government staff of new RENs enter the regulatory arena with varying degrees of prior experience with CPUC, and often have other demands on their time in addition to REN responsibilities. Part of our approach to technical and regulatory consulting services is collaborating with REN staff to understand their desired level of engagement with this work. In response, we can meet REN staff where they are and adjust the level of support we provide to be complementary.
- **Expertise based in highly relevant experience:** because regulatory work is at once both predictable and ever-changing, the central tenet of our approach is to apply best practices learned from years of experience serving similar clients and ongoing immersion in CPUC stakeholder activities.

In keeping with the approach outlined above, as we describe our understanding of the project scope and services to be provided in the following sections we include details of our relevant experience supporting other RENs in navigating the regulatory landscape.

As stated in the cover letter, we welcome the opportunity to adjust the proposed scope and budget during contract negotiations to suit RREN-North's needs.

# Services to be provided based on Frontier's understanding of the project scope

Frontier Energy's approaches to regulatory and program support services are anchored in best practices from providing those services to other clients, and our ongoing learnings gained from immersion in CPUC proceedings and stakeholder activities. As we discuss the project scope and services to be provided in the tasks below, we include detailed and highly relevant experience from working with similar clients to provide similar services.

#### Task 1 - Regulatory and Reporting Support

#### *Advise on compliance with CPUC regulations*

The CPUC regulatory landscape is complex and ever-changing. In the past four years alone, we have seen significant updates to existing paradigms as well as the establishment of new requirements relevant to EE PAs—the new four-year portfolio period and eight-year business plan overlay; the shift away from annual budget advice letters (ABALs) and fungibility of PA budgets across the four-year portfolio period; portfolio segmentation; the new Total System Benefit (TSB) metric; creation of the portfolio support cost accounting requirements; development and adoption of indicators for equity and market support; creation of Integrated Demand Side Management (IDSM) as an opportunity for holistic programs combining EE with other distributed energy resources (DERs); and the adoption of a Societal Cost Test (SCT) for informational purposes, just to name a few.

With Decision (D.) 23-06-055 in 2023, approving portfolios for 2024–2027, we have also seen marked increase in stakeholder and Joint PA coordination activities ordered by the Commission to support the development of new requirements that will apply to the next round of portfolios in 2028–2031, e.g., equity and market support (E+MS) goals; non-energy benefits; community engagement indicators; awareness, knowledge, attitudes, and behavior indicators; and more.

Monitoring Commission activities, interpreting Commission guidance, and advising clients and their implementers regarding compliance with requirements are a cornerstone of the Frontier team's technical and regulatory consulting services to RENs and community choice aggregators (CCAs). Moreover, we take a proactive stance in anticipating forthcoming Commission guidance and preparing our clients to comply rather than simply reacting after requirements go into effect. This level of support is enabled by our breadth and depth of involvement in stakeholder working groups and Joint PA activities, where current requirements are operationalized and forthcoming regulation can be informed prior to adoption.

Frontier has staff, databases, communication processes, and other infrastructure specifically for performing this work. Our Technical & Regulatory team has standing internal meetings dedicated to CPUC regulatory monitoring, where we examine new and forthcoming requirements, assess the potential impacts to RENs and other clients, and develop solutions and next steps to address every new update and requirement. We are also experienced in working with REN legal counsel to draft and deliver applications, motions, comments, reply comments, responses to data requests, and other regulatory documents.

Frontier's Technical & Regulatory team are responsible for monitoring relevant CPUC proceedings and assessing impacts to clients and their programs. This team conducts review of key legislation, strategy documents, and action plans. Frontier meets regularly with legal counsel specializing in the CPUC regulatory landscape to stay abreast of forthcoming guidance and the impacts to portfolio administrators.

#### Assist with Revised Business Plan Tier 3 Advice Letter and filing

In the Proposed Decision Modifying Rural Regional Energy Network Approved in Decision 23-06-055 (RREN PD), the Commission orders RREN-North to submit a Tier 3 AL updating its business plan no later than December 31, 2024. The Commission's guidance is brief, essentially less than 100 words, and very high-level with little to no detail provided.

As RREN-North's consultant, if selected, Frontier will place high priority on the Tier 3 AL as soon as our team is able to begin work. Our team will establish a schedule that ensures time for collaboration between RREN-North and Frontier at the outset, as well as time for review of draft and/or final documents by all necessary parties, committees, boards, etc. as may be required. Aided

by our years of experience providing comprehensive services to develop REN Business Plans, Frontier will comb through the RREN business plan files in detail to identify all necessary updates based on the RREN PD, while working in parallel with RCEA and partners to ensure any other desired changes are included in the scope of planned changes.

Our team is very experienced in drafting and submitting Tier 1, Tier 2, and Tier 3 ALs. This experience also includes supporting a REN with an ad hoc AL due to the unique timing of their portfolio and Commission decision-making, which may have some relevance to RREN-North's situation.

- We supported I-REN with a one-off AL ordered in their REN approval decision, to adapt their portfolio in response to a significant new regulatory requirement (portfolio segmentation) that had been ordered in May 2022 during the interim between their Business Plan submittal in February 2021 and approval decision in November 2021.
- For years we supported REN clients through the ABAL process, which was replaced by the Biennial Budget Advice Letter (BBAL) for 2022–2023, and the recent True-Up Advice Letter (TUAL) in Fall 2023.
  - We supported four RENs with their TUALs: RREN, 3C-REN, BayREN, and I-REN.
- We supported two RENs with their recent IDSM ALs in March 2024.
- We have supported numerous CCAs with their Tier 3 ALs to become Elect-to-Administer (ETA) EE PAs. These CCAs have included Lancaster Choice Energy (LCE), San Jose Clean Energy (SJCE), Ava (formerly "East Bay") Community Energy, and City and County of San Francisco Environment (SFE)/CleanPowerSF.

# Support RCEA in participation in Joint Program Administrator (PA) Advice Letter process for Decision D.23-06-055 Ordering Paragraph (OP) 25 and OP 32

Representation in stakeholder and Joint PA activities is crucial for RENs. Because of the unique nature of their portfolios, the requirements that do and do not apply to them, the overlap between REN and investor-owned utility (IOU) territories, and numerous other factors, RENs alternately find themselves either left out of stakeholder processes or directly targeted by them. Frontier is committed to actively engaging in these venues to ensure RENs, including RREN-North, have equitable opportunities to participate in these conversations, that they are not unfairly targeted by other parties, and that their unique value is recognized in the EE landscape.

The importance of this work cannot be overstated, especially given the major stakeholder processes ordered by D.23-06-055 to occur in the next several years, including OP 25 and OP 32. Regarding OP 25 and OP 32 specifically, the Frontier team has been and will continue to be active in both these Joint PA processes as advocates for REN PAs in general and our REN clients in particular. We propose to continue providing these services for RREN-North, tailored to meet RREN-North's needs—whether that looks like attending behalf or alongside RREN-North staff, and/or preparing RREN-North staff in advance of meetings to build staff capacity to participate in these conversations.

OP 25 consists of two separate but related scopes and two different ALs:

- Tier 3 AL for E+MS goal-setting, due March 1, 2025
  - This effort has just recently begun, in the past several weeks.
  - o In D.23-06-055 the Commission asserts that "[i]n particular, because the majority of the REN portfolios is dedicated to E+MS offerings, new goals covering these primary purposes should be important accountability mechanisms for RENs." 1

<sup>&</sup>lt;sup>1</sup> D.23-06-055 at 71.

- o It is crucial that REN PAs such as RREN-North stay fully engaged in this stakeholder process prior to the March 2025 AL and after the evaluation, measurement, and verification (EM&V) study is conducted, when study findings will be used to inform goals and targets, as these may become the topline goals the Commission look to in determining the value REN programs provide.
- Tier 2 AL for conducting AKAB surveys, submitted August 1, 2024
  - While this AL has been submitted, it has not been approved yet by the Commission.
  - After approval, PG&E as the lead PA will hire a vendor to conduct surveys, the results of which PAs propose to begin reporting on beginning as early as the 2025 Annual Report (AR) in early 2026, depending on timing of Commission approval. PAs will also have to consider the results of the studies to inform "to inform baselines and PA progress, as well as setting of targets and goals for the market support segment"<sup>2</sup>, related to the first workstream ordered in OP 25 for E+MS goal-setting above.
  - In the coming years REN PAs should work to ensure the data they need are collected through these surveys, and that the goal-setting process aligns with data that will be readily accessible to RENs.

#### OP 32 consists of an AL that will be filed.

- Tier 2 AL for identifying similar and/or duplicative programs, due October 1, 2024
  - This AL is slated for submittal shortly after the contract for the RREN-North admin support work goes to the RCEA board for approval. However, during the timeframe to produce this proposal, a recent development has emerged that may necessitate a revisiting of the OP 32 work.
  - While the first round was time-intensive, the second round of OP 32 analysis may require even more advocacy on behalf of REN PAs, due to the IOUs' stated intention to push for investigation of whether 'program precedence' guidance is needed from the Commission.
  - o In past attempts to push for program precedence, the IOUs have asserted that their programs should be prioritized above REN programs. The establishment of program precedence rules (in which one type of program is given priority over other programs, based criteria such as date of launch, type of program, type of PA, service territory, etc.) runs counter to the mission of RENs. The concept of a REN PA was originally created to address the needs to serve customers who were underserved or *unserved* by existing IOU programs. This type of E+MS is clearly still needed to ensure customers can access the benefits of EE that their ratepayer funds support. In fact, the establishment of the E+MS segments of the portfolio for *all* PAs underscores the importance of this work.
  - O Program precedence, if adopted in the way the IOUs have previously advocated for, could place RENs at risk of having programs defunded. If the proposed language is included in the final OP 32 AL, it will be crucial to advocate for RENs in the next iteration of this OP 32 stakeholder work. The timing of that effort is not known as it depends on a series of factors, most of which are not within any individual PA's control (e.g., whether the language is included in the final AL whether the AL is escalated from Tier 2 to Tier 3 as suggested by utility PAs, how long the Commission takes to respond, and how they respond).

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<sup>&</sup>lt;sup>2</sup> D.23-06-055 at 72.

Support compliance with adequate Evaluation, Measurement, and Verification (EM&V) requirements as described in Decision D.23-06-055 Section 5.3.1.

The two major requirements established in D.23-06-055 Section 5.3.1 are shown below, with Frontier input regarding relevance to the RREN-North portfolio and approach for supporting compliance.

- Ensure adequate measurement and verification (M&V) requirements in third-party contracts for all segments, such that source data (e.g., customer names and addresses where installations occurred) can be tracked and verified.
  - In parallel with supporting RREN-North with developing request for proposals (RFPs) (as requested in Scope of Work Task 4), Frontier will provide draft language and/or review of existing language to ensure this requirement is made clear to potential program implementers in RFPs and contracts.
  - Frontier is experienced in developing data collection protocols and working with PAs and implementers to encourage adherence to best practices in data collection for evaluability and compliance with Commission requirements.
  - o For I-REN, Frontier supported program managers in developing data collection instruments and procedures based on prior REN evaluation findings. I-REN was evaluated by CPUC in mid/late 2023 and evaluators produced an "Evaluability Assessment" identifying I-REN's progress toward tracking crucial data for future evaluations. I-REN received glowing praise from evaluators, whose findings included I-REN being "well prepared" to start data collection as programs launched, and that data collected so far were "of high quality and completeness and mergeable with the CPUC program database."
- Identify approaches to verifying upstream and midstream installations that are mutually beneficial for relevant partners. Such approaches may include, for example, direct exchange of data and sampling. The PAs must identify and describe these approaches in their annual reports as part of the market support content on partnerships..... we require this tracking for upstream and midstream programs unless an exception is made through a Tier 2 AL.
  - O This requirement applies specifically to upstream and midstream programs. None of the RREN programs in California Energy Data and Reporting System (CEDARS) are flagged as upstream or midstream; therefore, this requirement does not *appear* to be applicable to the RREN portfolio at this time. However, we will work with RRENNorth to establish whether changes to its portfolio during the Tier 3 AL to update the Business Plan will have any ramifications for this.

Assist with development and filing of Tier 3 Advice Letter to implement Integrated Demand Side Management (IDSM) measures

Earlier this year in March 2024, Frontier assisted two REN clients (3C-REN and I-REN) with submitting their Tier 3 IDSM ALs. Based on conversations with Energy Division staff, the IDSM AL resolution for other PAs is expected from the Commission in October, and RREN will benefit substantially from Frontier's analysis of the resolution and any learnings from the other RENs' experience that Frontier can then apply to drafting RREN's IDSM AL.

In our recent experience, preparation of the IDSM ALs involved program ideation in close collaboration with program teams to explore how they may wish to layer IDSM offerings with existing programs, and/or create standalone IDSM offerings. Frontier worked with REN leadership teams and program implementers to forecast IDSM budget needs within the prescribed threshold per D.23-06-055. Frontier drafted the IDSM ALs using the template provided by Energy Division and circulated the drafts for program team input as appropriate.

As with the many other types of ALs that Frontier prepares for clients, after finalizing the AL content Frontier prepared the necessary Energy Division AL forms, drafted submittal emails, managed the upload process to CPUC's AL database, and continues to track the AL's status while awaiting Commission response. Frontier also maintains AL trackers for our REN clients to identify previously-submitted ALs, status, results, links, and other key information. These trackers also serve as a reference for which AL number will come next, as Energy Division ALs must be submitted with sequential numbering in a specific format to avoid rejection by the Energy Division Tariff Unit.

# Coordinate and facilitate Joint Cooperation Memo (JCM) process with PG&E, before program launch and subsequent JCMs every two years

In 2023, Frontier worked extensively with RCEA to coordinate among RREN partners and other PAs for meetings and JCM drafting in anticipation of RREN's first JCM submittal. This work will form the foundation of RREN North's first JCM and will ease the lift of producing the first JCM submittal, assumed to follow approval of the Tier 3 AL adjusting the RREN business plan.

In addition to this highly relevant experience working directly with RCEA on the RREN JCM, Frontier has extensive experience coordinating and facilitating the JCM process with other REN PAs and their IOU counterparts over the past five years. This includes JCM coordination and drafting as well as ongoing coordination meetings. Just last week, Frontier supported 3C-REN in their quarterly JCM coordination meeting with PG&E.

As with our other REN clients, Frontier's services to support the RREN-North JCM process will encompass scheduling meetings between RREN-North and PG&E, preparing draft agendas for RREN-North review and input, and circulating agendas to PG&E in advance of meetings. The Frontier team can fully facilitate JCM meetings or prepare RREN-North staff to facilitate. This applies both to the pre-JCM meetings to prepare for drafting the 2024–2025 JCM and 2026–2027 JCM, as well as ongoing coordination meetings across the contract period, assumed to be quarterly based on the cadence of other RENs' ongoing JCM meetings.

To support drafting of the 2024–2025 and 2026–2027 JCMs, Frontier will prepare the draft JCM template and circulate to RREN-North program teams for input prior to sharing with PG&E. If needed Frontier can compile contributions from multiple parties after each round of edits. With each round of drafts and edits, Frontier will produce a full redline showing all parties' contributions. As part of the drafting process, Frontier can also advise regarding coordination best practices employed by other RENs and IOUs.

Frontier will manage the schedule to parties' input and encourage adherence to the timeline to ensure adequate time for legal review by RCEA and PG&E, prior to finalizing the JCM and submitting it via CEDARS as specified in D.23-06-055.

# Assist RCEA with internal processes to support regulatory reporting such as data collection best practices and understanding reporting requirements

Over the last decade, Frontier has led regulatory reporting on behalf of nine CPUC approved PAs. This includes coordinating with 3<sup>rd</sup> party PAs to provide training, quality assurance (QA), and feedback on reports. The Frontier team is intimately familiar with the CEDARS platform and claim specifications. Using this knowledge, Frontier has developed QA/quality control (QC) tools to automatically validate claims against the CEDARS spec. This has resulted in streamlined claims processing with fewer valuation errors. The team also has access to in-house Salesforce developers who can advise on data collection best practices.

Frontier has been approved for handling Customer Data through PG&E's Third Party Security Review process since 2017. Frontier adheres to all national and state requirements for protecting information. We enforce industry data security and governance standards such as ISO27001 and

National Institute of Standards and Technology (NIST). Frontier's 2021 SOC2 type audit was completed with no exceptions. Frontier can provide a copy of the SOC2 report during contracting, if requested, as well as the latest approval notification from P&GE.

Assist with regulatory and financial reporting structures, development of templates and procedures

If awarded, Frontier will develop clear written instructions, Excel templates, and detailed schedules to ensure RuralREN-North captures the necessary reporting inputs and meets all CEDARS deadlines. Through our work with multiple CPUC PAs, our team has identified efficiencies in reporting across clients, resulting in increased accuracy of reporting inputs and cost savings for our clients. For example, Frontier can leverage existing tools built to calculate energy savings, validate reporting inputs against allowed value sets, and generate reporting tables that fully align with CEDARS specifications.

Frontier has built a strong working relationship with program implementers and provides regular feedback on data quality and formatting to ensure alignment with CPUC specifications and that our clients' programs are using the most strategic reporting inputs. Frontier has also developed connections with Energy Division staff through regular and active attendance at reporting group meetings. Frontier leverages these connections to quickly troubleshoot reporting errors directly with Energy Division staff and raise larger strategy questions during reporting group meetings.

With regard to financial reporting structures, templates, and procedures, Frontier has frequently advised new REN clients in best practices to establish tracking of CPUC-approved funding for EE programs and adhere to Commission guidance regarding cost categories and allowed expenditures. While RREN-North is a new REN, RCEA's experience as an ETA CCA has likely prompted some familiarity with CPUC cost categories and related guidance. However, we have included labor hours for our team's dedicated accounting consultant to provide support if needed now that RCEA will be administering a larger program portfolio.

In the past this support has included providing recommendations to REN client accounting teams in establishing appropriate billing structures to include CPUC cost categories, developing templates with macros for converting REN client general ledger accounting data to CPUC reporting format, and participating in scoping activities with accounting software vendors to advise regarding CPUC financial reporting needs.

#### Assist with monthly, quarterly, and annual regulatory and financial reporting

Frontier has led the coordination, review, and submission of CPUC reporting on behalf of PAs for over ten years. This experience includes on-time submission all monthly, quarterly, and annual reporting in CEDARS during that period. Frontier is uniquely qualified in this area and currently supports three RENs and three CCAs with CEDARS reporting. Frontier has developed detailed internal processes and calculators to generate the various outputs required for annual reporting based on CET values.

Additionally, Frontier works closely with the CEDARS team on specification updates that will impact REN and CCA reporting. The CEDARS team knows they can solicit input from multiple PAs in a single conversation with Frontier, and Frontier's clients realize cost savings while continuing to have their interests and priorities heard by CEDARS reporting staff. Frontier attends all CEDARS testing and walkthrough sessions and regularly provides feedback. Frontier advocated for additional utility account number fields to better accommodate RENs who serve multiple IOU territories, such as 3C-REN and I-REN. This suggestion was implemented in the 2022 CEDARS updates. The Frontier team is always looking for and communicating ways that CEDARS can better suit the needs of REN and CCA PAs.

#### Assist with mid-cycle advice letter and associated reporting tables and appendices

Frontier is well prepared to assist RREN-North with the upcoming mid-cycle advice letter (MCAL), as we have continuously supported our clients with budget AL filings over the last eight years. Frontier helped our clients develop their 2018–2025 EE Business plans, which were adopted in 2018, followed by the ABALs each year through 2021. Frontier provided support as the ABAL shifted to the BBAL for program years 2022–2023. Frontier then worked with our clients to submit the 2024-2031 business plans, followed most recently by the 2024–2027 TUAL.

Every year, Frontier has seen the budget filing process evolve and has supported our clients through these complex filings. We maintain a high level of organization to deliver comprehensive narratives, tables, and appendices. Our team has an arsenal of templates, schedules, and calculators which can be adapted to suit the specific requirements of the filing. For example, we have developed calculators to transform raw CET outputs into a format compatible with reporting tables. If awarded, we will develop detailed schedules and punch lists for the upcoming MCAL to ensure all components are completed on-time.

#### Assist with AL filings for fund shifting, new programs, or program closures, as needed

While AL filings are no longer required for fund shifting, as established by the Commission in <u>D.15-10-028</u> OP 18, Frontier is well prepared to support RREN-North with ALs if needed for opening or closing programs outside of the business plan process. Please see Task 1, Subtask <u>"Support RCEA in participation in Joint Program Administrator (PA) Advice Letter process for Decision <u>D.23-06-055</u> <u>Ordering Paragraph (OP) 25 and OP 32"</u> for additional details on our approach to and experience with AL development.</u>

#### Assist with regulatory compliance based on current CPUC guidance

As described earlier in this proposal, there was a multitude of new requirements laid out in D.23-06-055. In addition to OP 25 and OP 32 described earlier in Task 1, the below are a few more specific items we'd like to make note of:

- California Energy Efficiency Coordinating Committee (CAEECC) Portfolio Performance Report Reviews<sup>3</sup>
  - This requirement was initially described in the April 24, 2020 CAEECC process proposal, and adopted by the Commission in the June 2023 application decision as a way to provide greater oversight and stakeholder engagement with PAs' portfolios.
  - The requirement consists of two report-outs to CAEECC, described below:
    - High-level overview of AR at time of filing (D.23-06-055 at 27)
    - Update on progress, approx. 6 months after AR filing (D.23-06-055 at 27)
  - Frontier developed the high-level AR overview presentations for two REN clients to deliver in May 2024.
  - The format of the October presentations will be discussed at the upcoming September 17, 2024 CAEECC meeting, and Frontier will begin preparing those presentations for our clients shortly thereafter.
  - NOTE: RREN-North did not have a 2023 AR containing plans for 2024, so it's like the requirement would not strictly apply. However, RREN-North may wish to take that opportunity to address stakeholders at that time, as the Final Decision Modifying D.23-06-055 will most likely have been voted on by the Commission by that time. Frontier would be more than happy to support RREN-North by preparing a brief presentation for this purpose.
- Additional Joint PA and/or stakeholder activities: as with the OPs described earlier in Task 1, as these activities ramp up during the coming years, Frontier recommends and can assist with RREN-North's engagement in these processes.

<sup>&</sup>lt;sup>3</sup> D.23-06-055 at 27.

- OP 2 Joint PAs statewide program portfolio assessment process: with the recent approval of BayREN to deliver a statewide program—the first REN to do so— Frontier recommends that RENs stay engaged with conversations around statewide programs.
  - NOTE: This is even more crucial given the recent resurgence of discussions related to "program precedence" (see Task 1 subtask regarding OP 32). If IOUs and Energy Division continue to pursue the establishment of program hierarchy that places statewide programs at the top of the food chain, it will be important for RENs to claim a seat at the table where statewide programs are being discussed.
- OP 19 Non-energy benefit (NEB) indicators for equity segment: Frontier participated on behalf of our REN clients in the Market Rate NEBs Working Group that begin in late 2023 and culminated with the NEBs report and AL mid-2024. The next step of this effort is a NEBs study to be completed by October 1, 2026 which will then inform equity indicators related to NEBs. Energy Division will produce a template for PAs no later than December 1, 2027 for PAs to begin tracking and reporting NEB indicators as of Q1 2028.
  - After the study concludes, Frontier recommends that the findings be examined in order to prepare in late 2027 for data collection to support Commission-mandated tracking to begin January 1, 2028.
- OP 23 Demographic Participation Information: this effort will be coordinated through the Reporting Peer Coordination Group (RPCG) to submit a report September 1, 2025, then PAs are to propose an approach for demographic participation data collection and tracking in the next business plan in February 2026.
  - Frontier will be keyed into these activities as part of our ongoing participation in the RPCG.
- o OP 24 Community Engagement Indicators: this effort will develop indicators to propose in PAs' MCALs in Fall 2025, which will then be reported annually in ARs.
  - Community engagement is an important aspect of the Commission's Environmental and Social Justice Action Plan (ESJ Action Plan), and a crucial element of REN portfolios. These indicators, similar to the E+MS goals, will likely be important measures of success for RENs.
- OP 31 Community Programs: the Commission is interested in encouraging more community involvement in EE portfolio design and delivery, also in line with the ESJ Action Plan as described above, saying "Because of their nature of being more locally-focused, we expect that RENs are uniquely positioned to make progress on this issue."<sup>4</sup>
  - The Commission directed SoCalREN to lead the initial effort to create a collaborative and launch a pilot for implementation in 2026–2027. This initial effort is launching now and will be presented at the September 17, 2024 CAEECC meeting.
  - The Commission also directs PAs to collaborate to structure a process for community-based programs across *all* PA portfolios to propose in the next business plan in February 2026.
  - Given the Commission's focus on RENs for this effort, Frontier recommends RREN-North stay engaged with this process.

Assist with preparation of a new Business Plan and for the 2028–2031 program cycle RREN-North faces a unique timing challenge in the ~17 months ahead:

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<sup>&</sup>lt;sup>4</sup> D.23-06-055 at 81.

- **Tier 3 AL:** The Tier 3 AL updating RREN-North's initial Business Plan must be updated before December 31, 2024.
- **Program launches:** In parallel in late 2024 and early 2025, RREN-North will also look to solicit and contract with implementers, launch its initial set of programs, update program documentation, and complete a JCM.
- **2028–2035 Strategic Business Plan and 2028–2031 Portfolio Plan:** In parallel or shortly after programs launch, RREN-North must turn its attention to the next business plan filing, due February 2026.
  - NOTE: as described in Addendum 2 to the RFP with answers to bidders' questions, RREN-North has expressed its interest in possibly discontinuing some programs, augmenting existing programs, and adding new programs for 2028 and beyond.

This is in combination with timing elements that all PAs must consider:

- MCAL Fall 2025: Like all PAs, RREN-North will also need to complete its MCAL in Fall 2025 in parallel with developing its next business plan filing.
- **Stakeholder and Joint PA activities:** Overlaid with these efforts will be the multitude of new stakeholder activities described throughout our proposal, meant to ramp up in 2025 especially, to inform the next business plan filings.

Given these timing considerations, it is of paramount importance for RREN-North to have a skilled regulatory consultant who is already immersed in these activities and well-versed in completing business plan filings. Frontier is that consultant.

In the past five years Frontier, led by key members of our proposed team, is proud to have played a key role in REN clients' business plans approved for \$291 Million through 2027, and an additional \$170 Million in budget forecasts approved through 2031.

- I-REN: Beginning in 2019, the Frontier team provided regulatory guidance and consulting to Western Riverside Council of Governments (WRCOG) and their partner agencies for each step in the process to pursue the REN funding pathway for EE program administration.
  - This included support for CPUC ex parte communications, the CAEECC stakeholder process, filing comments, becoming a party to proceedings, program and portfolio budget development and guidance, cost-effectiveness analysis and forecasting, and drafting of the Business Plan. Frontier also provided expert support to I-REN in navigating the regulatory complexities of the post-submittal process.
  - Result: CPUC approval of I-REN and award of two additional years and an additional \$15 Million in funding.
- 3C-REN: Frontier provided comprehensive services in support of 3C-REN's 2024–2031 Strategic Business Plan and 2024–2027 Portfolio Plan.
  - This included overall project management, program ideation based on stakeholder input, extensive meetings with 3C-REN program managers to develop new programs and augment existing programs, drafting narrative content, forecasting savings and cost-effectiveness, developing detailed bottom-up budgets in compliance with Commission orders, preparing documents for filing, co-signing application exhibits as expert witnesses, and preparing rebuttal testimony.
- BayREN: Frontier worked in parallel with BayREN leadership and program managers to support their 2024–2031 Strategic Business Plan and 2024–2027 Portfolio Plan.
  - This included reviewing program content, assisting with implementation plans and associated documentation, producing savings forecasts, cost-effectiveness analysis, advisement regarding budgeting, and general regulatory guidance across the entire process.

Our services to each of these RENs were tailored to the level of support they desired with the various activities involved to produce the strategic business plan and portfolio plan filings. We have proposed a significant effort for RREN-North in the event that level of support is desired, but we can be flexible in adjusting our approach to complement RREN-North staff plans for leadership and/or involvement in the process. For RREN-North, Frontier has included a budget estimate that includes overall project coordination, virtual listening sessions with key stakeholders to inform program updates and/or new programs, as well as support with program ideation, budgeting, savings and cost-effectiveness analysis, drafting content, and finalizing content for filing.

#### Other regulatory and reporting support as needed as directed by future CPUC guidance

The Frontier team is ideally suited to provide RuralREN-North with ad hoc regulatory support, due to our close involvement in tracking relevant CPUC proceedings and monitoring the ever-changing landscape of regulatory requirements, technical inputs, and tools. Frontier has staff, databases, communication processes, and other infrastructure specifically for performing this work. Our Technical & Regulatory team has standing internal meetings dedicated to CPUC regulatory monitoring, where we examine new and forthcoming requirements, assess the potential impacts to RENs and other clients, and develop solutions and next steps to address every new update and requirement. We are also experienced in working with REN legal counsel to draft and deliver applications, motions, comments, reply comments, responses to data requests, and other regulatory documents.

Another benefit of Frontier's ad hoc regulatory support is our team's established relationships with CPUC Energy Division staff. We can reach out to our connections at Energy Division to obtain timely responses on important questions and guidance for areas of uncertainty in regulatory requirements. Frontier team members communicate directly to our Energy Division connections and assist clients so they can manage these communications and build their own relationships. Recent examples include Frontier obtaining guidance from Energy Division staff related to a REN client's JCM and providing draft emails and replies for a REN client to use in requesting clarity regarding budget requirements and their IOU program agreement.

With our team's deep expertise in CPUC technical and regulatory matters and our strong existing relationships in the EE industry, Frontier provides strategic guidance to clients, not just at the point of regulatory reporting and EM&V, but across the full cycle of program ideation, initial development, implementation, and ongoing regulatory consulting and advocacy. We provide value to our EE PA clients' portfolios by ensuring that our clients stay informed and can adapt to the latest regulatory and technical changes affecting their organizations and programs.

#### Task 2 - Program Implementation Support

The review, revision, and submission of required Implementation Plans, based upon final CPUC-developed template in Appendix 4 of CPUC Decision 15-10-028

Frontier is well-placed to lead development of new implementation plans, as well as the necessary amendments to existing plans. For example, last year, Frontier worked with BayREN program leads to draft and submit amendments for BayREN's Single Family and Water/Energy Nexus Programs implementation plans. At the same time, Frontier led the drafting of the implementation plan for BayREN's new Climate Careers Program.

Proposed team members have also supported program teams with any questions they had around IP development, this included hosting office hours and providing detailed written guidance and regulatory citations and templates. Frontier team members have coordinated with PA program teams to ensure implementation plan packages were complete with redline versions, final documents, and required change forms, and were uploaded to CEDARS.

Additionally, Frontier recently reviewed the latest draft Implementation Plan template shared by Energy Division on August 28, 2024 and provided comments and markup for CPUC consideration. Frontier's comments centered on making the template user friendly for program teams and ensuring that direction within the document aligns with CPUC Decision language.

Provide requested input and feedback on RuralREN North-developed program narratives, including design, delivery channels, and evaluation, measurement and verification (EM&V) plans

For all four of the RENs Frontier has worked with in previous years, Frontier has always had involvement with providing input to program design, delivery channels, EM&V plans, and narratives describing those elements.

These narratives appear in numerous different contexts, such as ARs, business plans, the new "program cards" included in the updated business plan template, implementation plans, program manuals, and more.

Frontier is skilled in guiding REN leadership and program managers in adhering to Commission regulations as well as best practices we have observed over our many years of working with RENs. Our team includes skilled writers who excel at adapting content to specific audiences and requirements associated with the different regulatory vehicles in which these narratives appear.

Regarding EM&V planning in particular, Frontier is experienced in working with clients to develop and prioritize their EM&V activities and to assist PAs in "selecting and managing a portfolio of programs to meet the CPUC's objectives as well as provide them with access to information on a real-time basis to improve program delivery," as directed in the Energy Efficiency Policy Manual.<sup>5</sup> Over the years, Frontier has supported RENs in a variety of EM&V strategy and prioritization exercises. One example includes developing potential areas of focus for BayREN Codes & Standards EM&V studies and research activities, which included providing background, proposed timeline, potential research questions, and identifying key parties for involvement.

Our experience with prioritizing overarching REN-funded EM&V activities includes work for 3C-REN where Frontier coordinated the process and planning for a broad scope of tasks including gap analysis; analyzing impacts of updates to savings potential and technical resources; and identifying next steps and potential partners for follow-on activities. Frontier is currently in progress with planning EM&V activities for I-REN as its portfolio matures. Frontier also played a leadership role in coordinating EM&V readiness across BayREN's portfolio of programs, in collaboration with BayREN and its EM&V consultants. We work with program leads to define best practices and procedures for collecting and providing data to CPUC, offering a continuous feedback loop to program leads and implementers to improve data collection and accuracy and ensure alignment with CPUC specifications.

Provide requested input and feedback on RuralREN North-developed program manuals and rules Frontier proposes to follow a collaborative process with program manuals and rules, with a level of support that can be adjusted up or down to accommodate RREN-North leadership and program managers' involvement in the process.

In parallel with our work described in the previous two subtasks, Frontier is very experienced in providing input to and feedback on REN program manuals and program rules. This experience covers many different sectors and program types, including several that will be relevant to RREN-North.

<sup>&</sup>lt;sup>5</sup> CPUC Energy Efficiency Policy Manual Version 6 April 2020, p.45.

#### BavREN

- o Cross-cutting Residential Financing
- Residential Multifamily
- Codes & Standards
- Note: Over the coming months, Frontier will also be reviewing and advising BayREN's Public Sector programs regarding their IPs and program manuals also

#### • 3C-REN

- o Residential Single Family NMEC
- o Residential Multifamily Whole Building
- o Commercial NMEC

#### IREN

- Codes & Standards
- o Public Sector

*Review and provide feedback on adjustment to program metrics and targets. Lead efforts will include:* 

Adjusting/refining calculations for total system benefit (TSB), total resource cost (TRC) and program administrator cost (PAC) for resource programs and RuralREN North portfolio Frontier has extensive experience working with the CET forecasting tool to set resource program targets. This includes creating forecasts from scratch, as well as working with program implementers to review, run, and refine forecasts. Our team understands how the various CET inputs interact and impact the TSB, TRC, and PAC outputs. If awarded, the Frontier team can provide this support to the RREN North program teams.

As a recent example, Frontier developed the BayREN Multifamily program's CET forecasts for the TUAL. Program Manager Casey Carnes used historic program savings, costs, and incentives to develop the CET inputs. She then adjusted her assumptions based on client direction and future program objectives. For example, the program recently rolled out higher incentives to drive electrification measure adoption. She increased the proportion of fuel substitution in the measure mix and increased assumed program costs and incentives accordingly. The forecast was run, outputs reviewed with the client, and adjusted per their feedback. This process was repeated until all parties were satisfied with the target TSB, TRC, and PAC outputs. While this forecast was based on deemed inputs, Frontier has engineering staff on hand to produce custom baseline assumptions as needed.

Frontier also supported 3C-REN, BayREN, and Marin Clean Energy (MCE) with their TUAL forecasting. For these clients, Frontier worked with 10 different program implementers to collect their CET inputs and aggregate at the portfolio level. Frontier provided QA feedback to implementers and guidance on how to optimize the CET inputs. Once finalized, the CET results were reviewed with the PAs to get signoff before confirming CEDARS.

#### Developing program logic models and process flows

Program logic model and process flow development should be accomplished in parallel with program design and documentation. Frontier recommends an iterative approach that drills into program attributes to clearly identify the different stakeholders, actions that will be taken, and desired outcomes.

Along with Frontier's experience supporting program design and development of documentation such as IPs and program manuals, as described in previous subtasks, Frontier has experience creating program logic models and process flows. This experience draws on Frontier team members' skills in three areas:

• Regulatory expertise to advise regarding Commission requirements expectations

- Program implementation experience to apply real-world lessons learned
- Graphic design skills to create imagery that is not just visually appealing but clear and easy to follow

Confirming appropriateness of applicable work papers, software tools, and other supports required to claim resource savings

The Frontier team is familiar with deemed, custom, and NMEC claim methodologies and understand the nuances of each. Our staff have submitted claims for dozens of programs using a combination of these delivery types. See approximate program breakdown below:

- 12+ deemed programs
- 5 custom programs
- 8 pay-for-performance programs (combination of population-NMEC, site NMEC, and Strategic Energy Management)

For reporting deemed savings, our team is very familiar with the electronic technical reference manual (eTRM) and how to identify the appropriate measure package for a claim. We have developed QA tools to automatically validate deemed claim inputs against CEDAR specifications. We have a deep understanding of CEDARS validation logic and can work through errors resulting from incorrect measure package utilization.

For example, CEDARS recently updated the validation logic for deemed measure packages. Now, the *earlier* of the application date or installation date is checked against measure package dates. This change caused numerous claims to be invalid, as program implementers previously used the installation date to select the measure package version. In some instances, a valid measure package was not available at time of application. Frontier worked with PAs and their implementers to update their reporting systems using program commitment milestones that better aligned with the available measures. This resolved all errors and allowed all savings to be claimed.

As listed above, Frontier has also supported 12+ custom or pay-for-performance programs. These claims are created using outputs of the implementer's chose software platform. Frontier has validation tools to confirm these claims align with CEDARS specifications. Our team is also familiar with custom tools, such as the Refrigerant Avoided Cost Calculator (RACC) and Fuel Substitution Calculator (FSC). We can review these tools, as provided by the implementer, to ensure accuracy of claim inputs.

Developing REN unique value metrics

NOTE: this subtask was not specifically called out in the RFP SOW; however, Frontier strongly recommends this work be performed if it has not already been completed.

REN unique value metrics (UVMs) are required per D.19-12-021.6 It was not apparent whether RREN had established UVMs as part of its initial business plan, so Frontier has included this subtask in the event that this work needs to be performed.

Frontier understands the unique value that RENs offer through their programs and has direct experience quantifying and reporting this to the CPUC. Frontier not only reports these metrics but has worked hand-in-hand with RENs to develop them for new programs and update them for existing programs.

For RREN-North, Frontier would propose to follow a process similar to that which Frontier facilitated for I-REN as a new REN:

<sup>&</sup>lt;sup>6</sup> D.19-12-021 Conclusion of Law 9.

- I-REN had included preliminary unique value concepts in its business plan filing. Frontier reviewed each unique value concept and identified a range of measurable and unique outcomes related to each concept, and facilitated working sessions with each I-REN sector team to explain UVM requirements, best practices, and options.
- As part of the Year 4 Evaluation of RENs in 2023, the Commission's evaluators examined I-REN's initial value concepts from the Business Plan and their connection to I-REN's strategic framework, the process I-REN undertook for evolving its value concepts into UVMs as outlined above, and the selected UVMs and data collected to date.
- In the resulting Draft Inland Regional Energy Network Evaluability Memo, the evaluation team found that I-REN's UVMs demonstrate its core values and are quantifiable and easily understandable. Moreover, the evaluation team recommended future RENs adopt a similar approach to the process that I-REN took to develop its value concepts into measurable UVMs, by aligning UVMs with core REN values, distinguishing the UVMs from other existing metrics, and proposing a limited set of initial UVMs that can grow over time as needed.

Should RREN-North already have UVMs in mind for some or all programs, Frontier can support with services need to fully develop and/or re-examine them if needed, and establish data collection and tracking for reporting purposes.

- This year, our team worked with 3C-REN to develop value metrics for new programs as well as refresh metrics for existing programs based on lessons learned through the last four years of implementation.
- To facilitate this process, Frontier reviewed the program manuals and narratives to identify core program objectives. The team then reviewed program reports and databases to understand what key data points are currently being tracked and any gaps in the data. Using this information Frontier proposed new metrics for each program and facilitated meetings with program teams to discuss and adopt these metrics. Frontier then set up the necessary systems to track and report this data.

#### Task 3 - Technical Program Support

Advise RCEA on new measure packages and Custom Project or normalized metered energy consumption (NMEC) guideline revisions that directly impact program implementation and claims

Frontier keeps abreast of all changes that impact measure savings, baselines, assumptions, workpapers, DEER, custom review, etc. by actively following regulatory proceedings, attending CPUC stakeholder webinars, and verifying technical information the workpaper archive site. Frontier attends all deemed custom working groups, as well as subgroups focused on specific custom measure and NMEC implementation. Frontier regularly reports back to our clients with any pertinent updates from these meetings and potential program implications. This includes changes to available deemed measures, progress on California Technical Forum (CalTF) development of "Custom Measure Packages" and advising when our clients should comment on proposed rulebook changes.

Frontier is familiar with ex-ante review policies and procedures established by CPUC D.11-07-030 and has direct experience supporting custom programs under BayREN, 3C-REN and Ava Community Energy. Under these PAs, Frontier has written and maintained comprehensive custom review procedure manuals. We understand the need to keep up-to-date electronic archive of all custom measures and projects for reporting, auditing, and evaluation purposes. The team will be responsible for effective record keeping such that calculation tools, documentation of how those tools were applied to custom measures, and documentation of custom project ex ante savings calculations are submitted electronically to the CPUC Energy Division and remain accessible to the Energy Division throughout the program cycle.

# Track dispositions, calculator updates, ex ante updates and database for energy efficient resources (DEER) updates that impact programs measures and offerings

Frontier's Technical & Regulatory team actively monitors CPUC reporting platforms for relevant updates such as the California eTRM, CEDARS, Basecamp, and DEER. Frontier routinely monitors eTRM for updates to deemed measure packages (formerly known as workpapers) and summarizes relevant updates such as new versions of an existing measure or measure retirement and reports these developments to the PA. This process ensures that all claim reporting utilizes the most current and approved inputs.

Without careful monitoring of the eTRM, implementation teams may not be aware that an offered measure has been retired and can no longer be claimed toward achieved energy savings. Frontier works closely with program teams to ensure they are informed of any forthcoming changes to the measures they offer. This proactive approach supports updating program design, measure selection, and informs strategic decision making. The awareness of measure file updates supports the streamlining of quarterly reporting and ensures our clients are aligned with the most up to date CPUC reporting requirements.

Frontier also monitors for updates to CPUC approved calculators such as the Modified Lighting Calculator (MLC), RACC, and the FSC. Earlier this year, the CPUC merged the RACC and FSC into one combined tool. Frontier read and summarized the 250-page technical guidance document and created tailored procedures for internal and client teams. Frontier hosted training sessions with MCE and San Fransisco Environment Department program teams demonstrating how to utilize the tool. Frontier provides QA review on calculators submitted by program implementers to ensure 1) the tool is populated correctly and 2) claims accurately reflect calculator outputs.

#### Support the maintenance of a comprehensive list of active measures for implementation

Leveraging the eTRM, Frontier will develop a list of viable deemed measures for implementation. This will be monitored for any new versions or measure retirement. Frontier will summarize updates to RREN-North and flag any items of importance for program implementation. Frontier also attends PA Deemed Measure working groups with IOU measure package developers and CPUC staff. This allows for additional insight into upcoming measure package changes that are not ascertainable to the public simply by monitoring eTRM. Frontier will report back on any upcoming changes to the client.

Additionally, Frontier attends CalTF working groups focused on the development of "Custom Measure Packages." These measure packages are intended to streamline the custom review process by providing tools, resources and guidance to PAs. Custom measure packages currently in development include:

- Steam boilers
- HVAC chiller systems
- Pumping systems
- Multifamily whole building
- Compressed air systems
- Lighting systems
- Site NMEC

Frontier will remain engaged in these sessions and advise on the implementation of custom measure packages as applicable for client programs.

Provide regular updates on fuel substitution measure packages and decarbonization efforts
The Frontier team actively monitors updates to fuel substitution measures, decisions, and reporting tools. In addition to attending stakeholder meetings focused on fuel substitution, Frontier attends the RPCG, custom, and deemed working groups where fuel substitution is frequently a topic of discussion. This allows us to keep ourselves and our clients informed of any updates.

Additionally, Frontier is part of the TECH Clean California and EBD teams. These programs focus on electrification and decarbonization efforts throughout the state. The wider Frontier team is keenly aware of statewide decarbonization efforts through this work, and actively looks for opportunities for cross-promotion and collaboration.

#### Support launch of resource programs using NMEC methodology

Frontier has supported the launch of both of 3C-REN's Population Level NMEC programs. The Single-Family NMEC program, launched in 2022, has completed over 800 projects. 3C-REN's Commercial NMEC program is slated to launch by the end of September 2024. Frontier works closely with the 3<sup>rd</sup> party implementer to balance program success with regulatory compliance. Frontier provides 3C-REN with guidance on implementer contracts and reviews their invoices for accuracy with reported program achievements.

Frontier's role on these programs includes:

- Established CEDARS reporting templates, schedules, and protocols tailored to NMEC claim methodology.
- Established double dipping protocols and data sharing processes with three IOUs.
- Reviewed Implementation Plans, Program Manuals, and M&V plans for consistency with program objectives and NMEC rules.
- Established accounting system for processing incentive payments to aggregators.
- Reviewed selected 3<sup>rd</sup> party implementer contract terms and invoices. Provided feedback to ensure client best interests were protected.
- Track progress toward program goals (TSB, TRC, kWh, Therms) and advise on programmatic changes to support goal attainment

#### Ad-hoc research and technical report related to implementation of programs

Frontier employs experienced engineers who can be called on to develop workpapers, review technical documents, or attend technical subcommittee meetings as needed. Our experts are well-versed in the technical inputs required for workpaper development. Frontier's Food Service Technology Center staff developed the majority of the foodservice equipment testing data on which key ENERGY STAR measures are based, including convection ovens, combi ovens, fryers, steamers, holding cabinets, dishwashers, and ice makers. Frontier engineers have also conducted lab and field research for a broad range of efficient or low-carbon building technologies, as well as gas replacement technologies such as air-to-air heat pumps, air-to-water heat pumps, heat pump water heaters, radiant panels, and induction cooking equipment. Frontier would be ready to leverage internal resources should the need for technical reports and/or research arise.

#### Task 4 – Ad-Hoc Administration, Technical, and Regulatory Support

Coordinate attendance at and report back to RuralREN North about the Reporting Peer Coordination Group (RPCG) meetings, Metrics Working Group meetings, and CAEECC meetings

Ahead of all PCG meetings, Frontier flags agenda items of particular importance to RENs. Our clients can then decide to attend these sessions and/or send Frontier as a proxy. Frontier is comfortable speaking on behalf of our clients' interests in these sessions. The CEDARS team knows they can solicit input from multiple PAs in a single conversation with Frontier, and Frontier's clients realize cost savings while continuing to have their interests and priorities heard by reporting staff. Our

team documents all notes, key decisions, and action items and circulates to our clients after the meeting.

Similarly, Frontier staff attend the ongoing CAEECC and Metrics Working Group Meetings. Frontier coordinates with our clients ahead of these calls so we are prepared to contribute to the discussion and complete any "Homework" assigned. Frontier will ensure our clients are aware of all scheduled meetings, and report back on any discussion points of interest to RENs.

#### Attend other stakeholder workshops as needed

Frontier represents our clients at the following reporting subgroup meetings:

- EE RPCG (monthly)
- CPUC: Fuel Substitution Policy Group Meeting (quarterly)
- CEDARS testing and feedback meetings (ad hoc)
- Modified Lighting Calculator Discussion (quarterly)
- CalTF Custom Subcommittee (monthly)
- Monthly Deemed Measure Coordination (monthly)
- Program Administrator Coordination (biweekly)
- EM&V Quarterly Stakeholder Webinar (quarterly)

On these calls, Frontier advocates for REN interests to ensure non-IOU voices and perspectives are brought to the attention of Energy Division. For example, Energy Division recently proposed a new Data Governance structure. Frontier raised strong concerns about the resources this would require and the ability of RENs and CCAs to meaningfully participate. As a result, Energy Division is taking this feedback into consideration and will present a revised proposal. The Frontier team in attendance includes one or more staff members with relevant programmatic, technical, regulatory, or other expertise. These team members are selected based on their experience and ability to actively participate in the conversation, capture key takeaways, and communicate implications for RENs to our clients.

Assist with requests for proposals (RFPs)/requests for application (RFA) scope of work development and relevant research as well as prospective firm targeting. Some anticipated RFPs may include:

#### Database development for reporting

Frontier's team is comprised of multiple personnel with a strong background in Salesforce, including certified Salesforce administrators and experienced web developers. Frontier has successfully delivered a number of comprehensive databases for implementing EE programs. This work was performed through a combination of in-house development and partnership with specialized contractors. Frontier has experience vetting, contracting with, and overseeing database consultants to ensure satisfactory delivery. The Frontier team can leverage this experience to support RuralREN-North with RFP/RFA development and vetting qualified vendors for this work.

#### Technical support for NMEC-based program implementation and EM&V

As described above, Frontier works closely with 3C-REN's commercial and residential NMEC program implementer. This includes review of their invoicing and contract terms between 3C-REN and the vendor. Frontier also provided significant support for developing the RFP for I-REN's NMEC program implementer. This experience provides Frontier with valuable insight that can support RuralREN-North with the RFP and contracting process with a selected NMEC program implementer.

Coordinate attendance with RuralREN North staff for EM&V RPCG meetings and report back to RuralREN North staff regarding meeting discussion and information, as needed

As noted above, Frontier is an active participant in many stakeholder groups including the quarterly EM&V webinars. As these meetings can run for up to five hours, Frontier reviews meeting

agendas and highlights items of interest/impact to client programs. This ensures clients and program teams can attend relevant portions only. Our team follows up with notes, key takeaways, and action items from all stakeholder meetings.

#### Assist with CPUC or other stakeholder data requests

We are prepared to support RuralREN North with data requests following annual reporting, budget filings, and ad hoc requests that may arise at any point. The Frontier team understands that data requests from non-PA stakeholders can be ambiguous and not aligned with the realities of program administration. Frontier works to interpret data requests in a way that provides sufficient information for evaluation, demonstrates the unique value of RENs, and minimizes additional work for clients and staff.

This was recently accomplished while responding to Cal Advocates' request for "...the proposed measure mix quantities that was agreed upon in each contract as well as the actually implemented measure mix quantities for each program for program years 2017-2022." Despite a request for clarification, this item was vague and posed a potentially significant effort to fulfill. Frontier minimized the effort needed to satisfactorily respond by leveraging existing data in CEDARS. Frontier proposed comparing the forecasted measure mix in each year's budget AL filing against the actual claimed measures in the corresponding AR.

Both BayREN and 3C-REN, who Frontier supported with this request, agreed this was the most logical approach. Frontier performed this analysis and provided the results in a clear and concise format. Additionally, Frontier provided context to any forecasting shortfalls, such as changes to program strategy or ongoing impacts of COVID-19 and highlighted where the PAs met or exceeded their goals to provide a full picture of program activity.

The Frontier team brings an excellent track record of supporting RENs with CPUC evaluator data requests as well. Our team prides itself on providing thorough responses to evaluators' data requests, as well as thoughtful public comments in the CPUC's Public Documents Area in response to REN evaluation plans and work products. In a recent example from our work with I-REN, CPUC's evaluators requested data to support the I-REN Evaluability Assessment as part of the CPUC Group B Deliverable 22B: Year 4 Assessment of RENs. In finding out that I-REN had engaged Frontier for regulatory consulting, one evaluator replied, "It's great to know your [sic] working with Frontier, always a pleasure working with them on past REN evaluations."

#### Other activities as needed

The wider Technical and Regulatory team is comprised of more than a dozen staff members who can be leveraged to complete additional activities as required by RuralREN North. Additionally, Frontier can call upon subject matter experts across the enterprise to address new or complex tasks as they arise.

<sup>&</sup>lt;sup>7</sup> Email, Tierra Resource Consultants (CPUC Evaluator), August 8, 2023.

## **Detailed work schedule**

Cell color legend: green = from RFP, with subtasks added by FE where needed to detail costs orange = recommended subtasks added by FE (not specifically mentioned in RFP) gray = not intended to contain data			24 2025				2026				2027			
Task		Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Task 1 –	Regulatory and Reporting support													
1.1	Advise on compliance with CPUC regulations.													
1.2	Assist with Revised Business Plan Tier 3 Advice Letter and filing.													
1.3	Support RCEA in participation in Joint PA Advice Letter process for Decision D.23-06-055 Ordering Paragraph (OP) 25 and OP 32.													
1.3.a	OP 25: Advice Letter due March 1, 2025													
1.3.b	3.b OP 32: Advice Letter due October 1, 2024													
1.4	Support compliance with adequate Evaluation, Measurement, and Verification (EM&V) requirements as described in Decision D.23-06-055 Section 5.3.1.													
1.5	Assist with development and filing of Tier 3 Advice Letter to implement Integrated Demand Side Management IDSM measures.													
1.6	Coordinate and facilitate Joint Cooperation Memo (JCM) process with PG&E, before program launch and subsequent JCMs every two years.													
1.6.a	2024-2025 JCM: initial meetings and template in late 2024, finalize and submit in early 2025													
1.6.b	2026-2027 JCM: coordination, drafting, submittal 60 days following MCAL approval													
1.6.c	Ongoing coordination meetings with PG&E (quarterly cadence)													
1.7	Assist RCEA with internal processes to support regulatory reporting such as data collection best practices and understanding reporting requirements.													
1.8	Assist with regulatory and financial reporting structures, development of templates and procedures.													
1.9	Assist with monthly, quarterly, and annual regulatory and financial reporting.													
1.10	Assist with mid-cycle advice letter and associated reporting tables and appendices.													
1.10.a	a Mid-cycle advice letter (Fall 2025)													
1.10.b	True-up advice letter (Fall 2027)													
1.11	Assist with advice letter filings for fund shifting, new programs, or program closures, as needed.													
1.12	Assist with regulatory compliance based on current CPUC guidance													
1.12.a	CAFECC Presentation of AR: high-level overview of Annual Report (AR) at time of filing (D. 23-06-055													

Cell color legend: green = from RFP, with subtasks added by FE where needed to detail costs orange = recommended subtasks added by FE (not specifically mentioned in RFP) gray = not intended to contain data			2025					20	26		2027			
Task		Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
1.12.b	CAEECC AR Progress Update: update on progress, approx. 6 months after AR filing (D.23-06-055 at 27)													
1.12.c	OP 2: Joint PAs statewide program portfolio assessment process													
1.12.d	OP 19: Non-energy benefit (NEB) indicators for equity segment: must track and report as of Q1 2028, prep in late 2027													
1.12.e	OP 23: Demographic Participation Information: coordinate through RPCG to submit report 9/1/2025, then propose approach in next BP February 2026													
1.12.f	OP 24: Community Engagement Indicators: develop indicators and include in MCAL (Fall 2025), then report annually in ARs													
1.12.g	OP 31: Community Programs: Joint PA coordination to structure process and propose in next BP February 2026													
1.13	Assist with preparation of a new Business Plan and for the 2028-2031 program cycle													
1.14	Other regulatory and reporting support as needed as directed by future CPUC guidance.													
Task 2 –	Program Implementation Support													
	Assist RCEA with ensuring program development and implementation plans meet CPUC requirements. Support will include the following tasks:													
2.1	The review, revision, and submission of required Implementation Plans, based upon final CPUC-developed template in Appendix 4 of CPUC Decision 15-10-028;													
2.2	Provide requested input and feedback on RuralREN North-developed program narratives, including design, delivery channels, and evaluation, measurement and verification (EM&V) plans;													
2.3	Provide requested input and feedback on RuralREN North-developed program manuals and rules; and													
2.4	Review and provide feedback on adjustment to program metrics and targets. Lead efforts will include:													
2.4.a	Adjusting/refining calculations for total system benefit (TSB), total resource cost (TRC) and program administrator cost (PAC) for resource programs and RuralREN North portfolio;													
2.4.b	Developing program logic models and process flows;													
2.4.c	Confirming appropriateness of applicable work papers, software tools, and other supports required to claim resource savings.													
2.4.d	Developing REN unique value metrics per D.19-12-021													
2.5	Support program ramp down activities at the end of the four-year program cycle.													

Cell color legend: green = from RFP, with subtasks added by FE where needed to detail costs orange = recommended subtasks added by FE (not specifically mentioned in RFP) gray = not intended to contain data			2025				2026				2027			
Task		Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Task 3	– Technical Program Support													
3.1	Advise RCEA on new measure packages and Custom Project or normalized metered energy consumption (NMEC) guideline revisions that directly impact program implementation and claims.													
3.2	Track dispositions, calculator updates, ex ante updates and database for energy efficient resources (DEER) updates that impact programs measures and offerings.													
3.3	Support the maintenance of a comprehensive list of active measures for implementation.													
3.4	Provide regular updates on fuel substitution measure packages and decarbonization efforts.													
3.5	Support launch of resource programs using NMEC methodology.													
3.6	Ad-hoc research and technical report related to implementation of programs.													
Task 4	- Ad-Hoc Administration, Technical, and Regulatory Support													
4.1	Coordinate attendance at and report back to RuralREN North about the Reporting Peer Coordination Group (RPCG) meetings, Metrics Working Group meetings, and California Energy Efficiency Coordinating Committee (CAEECC) meetings.													
4.1.a	Reporting Peer Coordination Group (RPCG) meetings													
4.1.b	Metrics Working Group meetings													
4.1.c	California Energy Efficiency Coordinating Committee (CAEECC) meetings													
4.2	Attend other stakeholder workshops as needed.													
4.2.a	Data Working Group													
4.2.b	California Technical Forum (CalTF) Custom Subcommittees													
4.3	Assist with requests for proposals (RFPs)/requests for application (RFA) scope of work development and relevant research as well as prospective firm targeting. Some anticipated RFPs may include:													
4.3.a	Database development for reporting, and													
4.3.b	Technical support for NMEC-based program implementation and EM&V.													
4.4	Coordinate attendance with RuralREN North staff for EM&V RPCG meetings and report back to RuralREN North staff regarding meeting discussion and information, as needed.													
4.5	Assist with CPUC or other stakeholder data requests,													
4.6	Other activities as needed.													

# Professional relationships involving any other CPUC energy efficiency portfolio administrators and program implementors

Table 1: Frontier's professional relationships involving any other CPUC energy efficiency portfolio administrators and program implementors

Client Name	Years Contracted
XXXXX	xxxxx

Frontier Energy has extensive experience working with EE PAs. PAs are authorized by the CPUC to use public purpose program funds paid by ratepayers to plan, administer, and implement EE programs. The creation/operation of one PA does not alone conflict with the creation/operation of other such PAs – Frontier Energy agrees to abide by contractual confidentiality provisions and report any conflicts of interest once made aware.

## **B.** Company Information

Frontier will leverage our comprehensive in-house expertise and resources to deliver all required services independently, eliminating the need for subcontractors and streamlining project execution. See Exhibit B for Frontier's business information.

Figure 1 provides an overview of the project organization and staffing. Key individuals are named here, and resumes included as an appendix. Including the individuals named below, our team

serving California clients includes a dedicated staff of 28 employees specializing in technical and regulatory consulting and program implementation, with inter-disciplinary support available as needed from the nearly 170 other staff members across the broader organization.

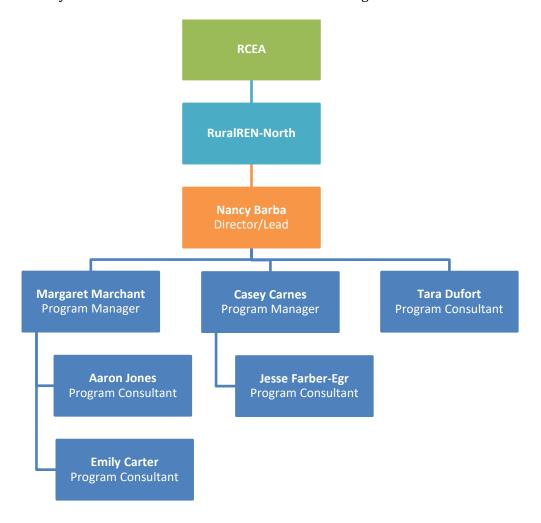


Figure 1: Project Organization and Staffing Chart

## C. Statement of Qualifications

## **Qualifications and experience (Firm and Personnel)**

#### Frontier Energy expertise & experience

The Frontier team, and specifically the key personnel proposed for this work, have previous and ongoing experience with all tasks and subtasks requested by RCEA for RREN-North. Specific elements of our experience that relate to the tasks and subtasks requested in the RFP are layered throughout our approach to the scope of work in the Executive Summary portion of this proposal. The sections below provide an additional overview of our recent and past experience directly related to CPUC funded EE programs and portfolios, program and portfolio administration, regulatory compliance, and reporting.

Since 2012, the Frontier team has played a key role in coordinating and assisting REN and CCA technical strategy and positioning within the CPUC's regulatory framework. This work spans filings

of business plans for new and existing RENs, ALs, program implementation plans, JCMs, and other required regulatory documents for PAs, as well as ongoing monthly, quarterly, and annual reporting.

In addition to our prior work for RCEA and interim support for RREN, our REN and CCA clients include 3C-REN, I-REN, MCE, SJCE, East Bay Community Energy (now Ava), California Choice Energy Authority (CalChoice), and previously BayREN, SoCalREN, and LCE.

Table 2: Frontier Energy Regulatory Support Clients and Services

Client	CPUC regulatory compliance support	Business and Implementation Plans	Energy savings and cost- effectiveness analysis	AL support (ABAL, TUAL, ETA, IDSM)	JCM coordination and drafting	EE program development	Responding to CPUC questions, data requests, etc.	EE data analysis/market support	Working with CAEECC
3C-REN	✓	✓	✓	✓	✓	✓	✓	✓	✓
BayREN	✓	✓	✓	✓	✓	✓	✓	✓	
I-REN	✓	✓	✓	✓	✓	✓	✓	✓	✓
SoCalREN	✓		✓			✓	✓	✓	✓
EBCE	✓		✓	✓		✓	✓	✓	
SJCE	✓		✓	✓		✓	✓	✓	
RCEA	✓		✓	✓			✓	✓	
MCE	✓		✓	✓			✓	✓	
CalChoice	✓			✓					

#### REN experience

Every Frontier staff member proposed for this work has experience supporting REN energy efficiency program portfolios, with experience spanning broad categories of program and portfolio administration, regulatory compliance, and reporting. Our specific experience matching each task and subtask is layered throughout our response to the scope of work earlier in this proposal.

Past and ongoing projects and key staff involvement include the following:

- BayREN: 2013-2023
  - o Key Staff: Nancy Barba, Casey Carnes, Margaret Marchant
- 3C-REN: 2017–present
  - Key Staff: Nancy Barba, Casey Carnes, Margaret Marchant, Aaron Jones, Jesse Farber-Eger
- I-REN: 2019–present
  - Key Staff: Nancy Barba, Casey Carnes, Margaret Marchant, Jesse Farber-Eger, Tara Dufort, Emily Carter
- SoCalREN: 2013–2017
  - Key Staff: Nancy Barba, Casey Carnes

#### RCEA & RuralREN experience

Frontier initially began work for RCEA in January 2020 by providing review of the CET submission for their Supplemental AL and 2020 budget filing. This included reviewing for compliance with statewide work papers, reviewing impacts of budget adjustments to CE outputs, and providing suggested revisions to optimize results. Frontier was later engaged to provide broader technical regulatory support. This included:

- Set up data tracking templates and best practices to ensure all necessary inputs captured for CPUC monthly and quarterly reporting.
- Supported 2021 ABAL filing through review of measure specifications, measure recommendations for inclusion in forecast, and submission of cost-effectiveness inputs into CEDARS.
- Performed desktop QA/QC on quarterly claims, providing feedback on corrections needed prior to confirmation in CEDARS.
- Maintained an active list of measures to inform program delivery and claims, checked the eTRM monthly for updates. Tracked dispositions, calculator updates, Ex Ante updates and DEER updates that impacted program's measures and offerings. Ensured any changes were reflected in the subsequent quarterly claims.
- Represented RCEA at RPCG and other relevant stakeholder meetings. Raised items of concern and advocated for CCA interests in these sessions. Provided notes and action items to RCEA.

Frontier provided the above services from July 2020–May 2024. The end of these services coincided with the end of RCEA's 3-year ETA cycle.

Frontier also provided interim administrative services to RuralREN via their contract with RCEA from August 2023–February 2024. This work included:

- Provided coordination and development support for the three separate JCMs between RuralREN and overlapping PAs.
- Provide draft reviews and consulting support as the RuralREN staff develop program Implementation Plans.
- Provide support with budget filing platform and metrics review. These tasks are components of the TUAL.

Key staff for this work included Nancy Barba, Casey Carnes and Margaret Marchant.

#### *CCA* experience

In addition to our REN work, Frontier has a long history supporting local governments with CCA regulatory strategy and portfolio administration. In the Bay Area, we worked with California's first operating CCA, MCE, on their 10-year business plan aimed at transforming the energy market by decreasing the need for incentives and reducing reliance on subsidies. The Frontier team evaluated EE measures in their existing program and then recommended new measures. We refined their portfolio design to reach CPUC's target of a cost-effectiveness score (TRC) of 1.25, meeting MCE's goals of moving toward a zero-net energy future. We also prepared an EM&V plan that included analysis and data collection strategies and market transformation indicators.

Since that time, we have worked with numerous California CCAs, including RCEA as described in the previous section, providing regulatory guidance, support with exploring the ETAPA pathway, ongoing regulatory reporting, and portfolio administration support. Nearly every key staff member proposed for our work brings additional regulatory experience from supporting CCAs.

Past and ongoing projects and key staff involvement include the following:

• MCE: 2017–present

- o Nancy Barba, Casey Carnes, Margaret Marchant, Jesse Farber-Eger
- LCE: 2018-2021
  - o Nancy Barba, Casey Carnes
- CalChoice: 2019–present
  - o Nancy Barba, Casey Carnes, Emily Carter
- SFE/CleanPowerSF: 2020-present
  - o Nancy Barba, Casey Carnes, Margaret Marchant
- SJCE: 2020–present
  - o Nancy Barba, Casey Carnes, Margaret Marchant
- RCEA: 2020-2024
  - o Nancy Barba, Casey Carnes
- Ava (formerly East Bay) Community Energy: 2021–present
  - o Nancy Barba, Casey Carnes, Margaret Marchant, Jesse Farber-Eger

#### Resumes

See Appendix B for resumes of key team members who will reform this work.

#### Summary of the qualifications and licenses held by key staff assigned to the project

The tables shown below provide a summary of qualifications for key staff assigned to this project as well as licenses and certifications. Frontier and all listed professionals are properly licensed to practice in California, ensuring full compliance with state regulations. Should you require further verification, proof of these licenses can be made available upon request.

Table 3: Frontier Team Member Qualifications

Employee Name, Title	Qualifications
Nancy Barba, Director/Lead	Nancy brings a rich background in regulatory consulting, program management, stakeholder engagement, and community outreach to her role of Director with the DSM group. Her effective communication skills and facility to manage diverse priorities contribute to her engaged, results-driven leadership. She directs the delivery of program launch and implementation activities, marketing and outreach, energy analysis, cost-effectiveness, and stakeholder relations. She works closely with RENs, CCAs, and utilities leading regulatory and technical support, program design, implementation, marketing and outreach, and financing.
Casey Carnes, Program Manager	Casey is the go-to person for regulatory, technical, and programmatic questions. Her areas of expertise include regulatory reporting, incentive pipeline development, QA protocols, and customer service. Casey leads CEDARS reporting on behalf of six PAs including three RENs and three CCAs. Casey played a crucial role in forecasting savings and cost-effectiveness impacts for REN clients' recent business plans, leading to Commission approval for \$291 Million through 2027, and an additional \$170 Million in budget forecasts approved through 2031. Previously she supported the filing of three Budget ALs in 2021, helping her clients secure over \$100M in CPUC funding. She has supported more than 10 EE programs across California during her 9 years with Frontier. She is a certified Salesforce Administrator who configures turn-key database solutions tailored to program and CEDARS reporting specifications.
Margaret Marchant, Program Manager	Margaret brings more than 15 years of experience in EE, with expertise in regulatory and strategic funding consulting, program development, and

implementation. With diligent attention to detail and excellent communication skills, she excels in collaborating with clients and stakeholders. As a member of Frontier's Technical & Regulatory team, Margaret is responsible for advising staff and clients regarding CPUC regulatory requirements and compliance strategies. This involves providing key updates to Frontier Energy team members. contributing to Frontier's analysis of impacts to clients from new regulatory guidance and updates to technical resources, collaborating with clients and program implementers to operationalize regulatory compliance, and participating in stakeholder group activities to advocate for client policy positions. In her strategic funding and regulatory consulting work, Margaret has successfully coordinated and drafted applications and ALs resulting in millions of dollars in ratepayer funding awarded to REN and CCA clients. Margaret further supports EE integrated DSM program development and implementation for REN clients. This includes research and program ideation, leadership for developing program processes and materials, and supporting REN program staff with regulatory filings and responses to data requests.

#### Aaron Jones, **Program Consultant**

Aaron came to Frontier with a background in guiding organizations on sustainable practices and Environmental, Social, and Governance (ESG) reporting. With a strong foundation in environmental science/policy and a keen understanding of corporate responsibility, Aaron provides regulatory compliance and reporting support to RENs at Frontier. Aaron has contributed to IDSM ALs, and stakeholder meeting participation. He works closely with 3C-REN for engagement in the OP 32 effort. He also contributes substantially to 3C-REN metrics support (common metrics, UVMs, and E+MS indicators), including identifying relevant metrics, developing methodologies, advising program teams regarding data collection, creating metrics data collection templates, coordinating program team contributions to monthly, quarterly, and annual reporting. Aaron also developed an Equity Toolkit used inhouse and by REN clients for identifying CPUC equity criteria by customer type.

#### **Jesse Farber-Eger**, **Program Consultant**

lesse has over five years of experience in the energy industry, and came to Frontier with a strong background in supporting business operations for CCAs in California. He has managed stakeholder relations with local agencies, utilities, and end users, overseeing call center operations, providing subject matter expertise for Net Energy Metering customers, and navigating utility databases to generate reports and facilitate billing. At Frontier, Jesse carries out regulatory reporting and deciphers the latest policy developments for RENs and CCAs. He has contributed to REN TUALs, IDSM ALs, and stakeholder meeting participation. He has worked closely with I-REN for engagement in the OP 32 effort. He also contributes substantially to REN metrics support (common metrics, UVMs, and E+MS indicators), including identifying relevant metrics, developing methodologies, advising program teams regarding data collection, creating metrics data collection templates, coordinating program team contributions to monthly, quarterly, and annual reporting.

#### **Emily Carter, Program Consultant**

Emily brings technical knowledge of building science and energy modeling to support Frontier clients' EE initiatives. Her expertise lies in thermal envelopes, renewable energy, and HVAC systems for single family, multifamily, and commercial buildings. Emily supports I-REN by providing technical assistance for the energy code, tracking equity and market segment indicators, and developing an EM&V plan for I-REN's three sectors. Emily supports RENs by drafting public comments for code cycles and ensuring they stay informed about relevant rulemakings that impact their programs. She also supports CalChoice with research to support Frontier's regulatory guidance.

#### Tara Dufort, **Program Consultant**

Tara has technical background in financial tracking and reporting for government clients, and bring this experience to her work supporting I-REN. Over the past 18 months Tara has worked with I-REN to assess their current accounting procedures related to REN expenditures, provided recommendations based on best practices, implemented new templates and procedures for tracking REN and consultant expenditures, and assists with REN monthly and quarterly regulatory reporting of program costs by cost category.

Table 4: Summary of Frontier team licenses and certifications

Licenses, Registrations, and Certifications	Key Staff
Building Performance Institute (BPI) Building Science Principles Certificate of Knowledge	Casey Carnes
Certified Green Building Professional (CGP)	Nancy Barba
Certified GreenPoint Advisor	Nancy Barba
International Organization for Standardization (ISO) 9001	Aaron Jones
ISO 14001	Aaron Jones
Project Management Institute (PMI) Project Management Professional (PMP)	Casey Carnes
Residential Energy Services Network (RESNET) Home Energy Rating System (HERS) Energy Modeler Certification	Emily Carter
U.S. Green Building Council LEED AP O+M	Nancy Barba

#### **Availability**

Frontier has a demonstrated record of staffing tasks efficiently and completing projects on time and within the allocated budget. Our team can be flexible with regard to staffing due to our ability to draw from a larger overall team as described in the Executive Summary.

A fairly recent and highly relevant example is our BayREN Strategic Business Plan and Portfolio Plan support in 2022: we supported key elements of BayREN's application under our existing contract for technical and regulatory consulting services and despite the increased activity required, our team provided these services in addition to our regular CPUC reporting services, responses to data requests, and other ad hoc regulatory consulting on time and within budget.

Similarly, across multiple years of providing business plan development and technical and regulatory reporting to 3C-REN since 2018, our total actual spend for 2018–2022 was lower than our total budget for those years.

#### References

#### I-REN Business Plan and ongoing regulatory support

**Description of project** 

The Frontier team provided regulatory guidance and consulting to WRCOG and their partner agencies, San Bernardino Council of Governments (SBCOG)

and Coachella Valley Association of Governments (CVAG), for each step in the process to pursue the REN funding pathway for EE program administration. Frontier also provided expert support to I-REN in navigating the regulatory complexities of the post-submittal process, resulting in CPUC approval for I-REN.

Frontier now serves as the lead consultant for REN development and ongoing regulatory support. Our team led the development of initial program metric targets and coordinated meetings between the I-REN partner agencies to ensure understanding across all parties of CPUC regulatory requirements and REN best practices for regulatory filings. This work has included:

- Development of initial program implementation plans for I-REN's Codes &Standards; public sector; and workforce, education, and training programs.
- Selection of representative metrics, indicators, and targets.
- Program segmentation and alignment of segment level metrics.
- Determination of the best method for data collection and analysis.
- Baseline data calculations.
- Development of I-REN's UVMs and data collection methodology.
- Ongoing support for quarterly and annual metrics reporting, calculation, and review.

Frontier has played a critical role in providing key information on the startup processes for RENs based on Frontier's experience with such organizations. The Frontier team uses its expertise in this area to lead coordination between I-REN and their implementors in ongoing data collection and reporting. Frontier provides support in the form of:

- CPUC monthly, quarterly, and annual reporting.
- Development and drafting of implementation plan updates.
- Consistent attendance on behalf of I-REN at technical and regulatory meetings, with analysis and reporting of key items that pertain to I-REN. Meetings include but are not limited to ad hoc working group meetings; E+MS Working Group meetings; Non-Energy Benefits Working Group meetings; All-PA Monthly calls; CalREN regulatory coordination meetings; OP 25 and OP 32 meetings; CAEECC meetings; Data Working Group meetings; and Reporting PCG meetings.

Completion date(s)	2019-Present
Approximate cost	XXXXX
Name of contact person	Casey Dailey, Director of Energy & Environmental Programs, WRCOG
Mailing address of contact person	3390 University Avenue, Suite 300 Riverside, CA 92501
Telephone number and email of contact person	951-405-6720

#### SJCE elect to administer support and regulatory support

Description of project

Beginning in 2020, Frontier was contracted to support the development of an EE program plan including the coordination and technical analysis required

for SJCE to request and receive rate payer funding to administer EE programs. Frontier's support for SJCE included a comprehensive analysis of available funding, program design and ideation, a market assessment, stakeholder coordination, and cost-effectiveness and technical support. These efforts culminated in a full Elect to Administer Tier 3 AL submittal. Frontier staff ensured that the proposed plan included sufficient detail to meet all criteria of Public Utility Code 381.1 I-(f) in accordance with the guidance provided in D.14-01-033. Frontier then worked with SJCE to appropriately target and scale program activities and anticipated project installation schedules, integrating these data into SJCE's submitted cost effectiveness calculations. Now that SICE is an EE PA with same standing as IOU PAs, Frontier provides ongoing technical, regulatory, and administrative support as SJCE launches and implements EE programs over a three-year cycle. Frontier coordinates and supports SJCE technical strategy and positioning within the CPUC's regulatory framework and sustains a high level of engagement with the CPUC and its consultants and with SJCE stakeholders as part of this effort. **Completion date(s)** 2020-Present XXXXX Approximate cost Kate Ziemba, Senior Environmental Program Manager -Name of contact person Community Programs, City of San José Mailing address of 200 E Santa Clara St contact person San José, CA 95113 Telephone number and 408-535-4889; kate.ziemba@sanjoseca.gov email of contact person

#### Ava (East Bay) Community Energy elect to administer advice letter

Description of project	<ul> <li>Frontier supported Ava Community Energy (formerly EBCE) with their ETA AL in 2021. This work included:</li> <li>ETA funding determination calculation.</li> <li>Feasibility assessment to offer a cost-effective program within budget.</li> <li>Market assessment including market characterization and market potential.</li> <li>Program design and ideation support.</li> <li>CET input and outputs to establish portfolio targets.</li> <li>Tier 3 AL filing including program budgets; strategic framework, initial goals and intervention strategies, and detailed strategies and narratives.</li> </ul>
	Now that Ava is an EE PA with same standing as IOU PAs, Frontier provides ongoing technical, regulatory, and administrative support. This includes:  • Develop and implement reporting protocols, templates, and schedules.

	<ul> <li>Coordinate with Program Implementer to receive monthly and quarterly data submissions in CEDARS reporting format. Provide QC on data and request corrections. Submit all reports in CEDARS.</li> <li>Review and provide feedback on drafted program documents from Program Implementer. Finalize and upload it to CEDARS.</li> <li>Create and maintain a progress tracking document to support tracking program activities towards program goals.</li> <li>Provide innovation/ideation support for EE program best practices and program design modifications as needed.</li> <li>Provide Ava staff with information related to key changes and activities within the CPUC that would impact the administration of Ava's EE program.</li> <li>Attend CPUC reporting meetings and relevant subgroup meetings on behalf of Ava.</li> </ul>	
Completion date(s)	2021-Present	
Approximate cost	XXXXX	
Name of contact person	Allison Lopez	
Mailing address of contact person	1999 Harrison Street Oakland, CA 94612	
Telephone number and email of contact person	510-641-0953; alopez@avaenergy.org	

## D. Project Fee Proposal

Please see sections below for project fee proposal information. As requested in the RFP, the method of compensation shall be on a time and expense basis subject to a not-to-exceed amount to complete the tasks detailed in the Scope of Work over the four years of the contract. Proposed rates shall be effective for the term of the contract.

#### Annual not-to-exceed fee for 2024–2027

Please see the table below summarizing Frontier's proposed not-to-exceed fees for each year of the requested 2024–2027 timeframe.

NOTE: In Addendum 1 responses to bidders' questions, RCEA indicated that "There is currently no set budget for these services. RuralREN North has an anticipated total budget from the Proposed Decision on August 21, 2024 and the Administrative tasks may not exceed 10% of that total budget. That Administration budget will include RuralREN North staff as well and the budget for the Administrative Support Services will be a portion of that total."

While Frontier has developed its budget to stay well within the RREN-North administration budget, we wish to point out that not all the requested activities must strictly be billed to the admin cost category. Our team is very familiar with the CPUC cost categories, caps and targets, and allowed expenditures from the Energy Efficiency Policy Manual<sup>8</sup> and has experience advising RENs regarding how to track their expenditures within those categories.

<sup>&</sup>lt;sup>8</sup> CPUC Energy Efficiency Policy Manual Version 6 April 2020, Appendix C, p.87-94.

• As just one example, some of the subtasks requested in Task 2 – Program Implementation Support (e.g., "Provide requested input and feedback on RuralREN North-developed program narratives, including design, delivery channels.....") could justifiably be categorized as Direct Implementation Non-Incentive costs, under the "Program planning, development and design" type of cost mentioned in the Direct Implementation Non-Incentive (DINI) Costs section of the EE Policy Manual's cost categories appendix.9

If helpful to RCEA, Frontier would be happy to discuss this further as part of contract negotiations and/or as part of the requested work.

Table 5: Frontier Energy Proposed Not-to-Exceed Fees (US\$), 2024-2027

					2024-2027
Task	2024 Total	2025 Total	2026 Total	2027 Total	Totals by Task
Task 1 – Regulatory and Reporting	XXXXX			XXXXX	
support		XXXXX	XXXXX		XXXXX
Task 2 – Program Implementation	XXXXX	XXXXX	XXXXX		
Support				XXXXX	XXXXX
Task 3 – Technical Program	XXXXX				
Support		XXXXX	XXXXX	XXXXX	XXXXX
Task 4 – Ad-Hoc Admin., Technical,					
and Regulatory Support	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
			XXXXX	XXXXX	
Non-Labor Costs	XXXXX	XXXXX			XXXXX
					<b>Grand Total</b>
Annual Totals	\$176,048	\$485,303	\$284,109	\$254,805	\$1,200,265

## Fee schedule of rates & expenses

Frontier has produced a comprehensive year-by-year budget proposal that takes into account our billing rates for each year from 2024–2027 as established by our corporate office. Those rates are shown below and included in our detailed personnel-hour estimates.

#### Notes:

- Materials, supplies, and travel expenses are billed at actual cost without markup.
- Mileage is billable at the allowable IRS rate.

Rates apply to employee categories named rather than individual staff.

Table 6: Frontier Energy Rates (US\$), 2024-2027

Category	2024	2025	2026	2027
President	XXXXX	XXXXX	XXXXX	XXXXX
Vice President	XXXXX	XXXXX	XXXXX	XXXXX
Sr. Director	XXXXX	XXXXX	XXXXX	XXXXX
Director / Principal Consultant	XXXXX	XXXXX	XXXXX	XXXXX
Sr. Manager / Engineering Manager	XXXXX	XXXXX	XXXXX	XXXXX
Manager	XXXXX	XXXXX	XXXXX	XXXXX

<sup>&</sup>lt;sup>9</sup> Ibid., p.92.

Sr. Engineer / Sr. Program Manager	XXXXX	XXXXX	XXXXX	XXXXX
Engineer / Program Manager	XXXXX	XXXXX	XXXXX	XXXXX
Sr. Program Consultant / Sr. Analyst	XXXXX	XXXXX	XXXXX	XXXXX
Program Consultant / Analyst	XXXXX	XXXXX	XXXXX	XXXXX
Sr. Program Coordinator / Sr. Technician	XXXXX	XXXXX	XXXXX	XXXXX
Program Coordinator / Technician	XXXXX	XXXXX	XXXXX	XXXXX
Program Associate / Direct Install Technician	XXXXX	XXXXX	XXXXX	XXXXX
Administrative	XXXXX	XXXXX	XXXXX	XXXXX

## Detailed personnel-hour estimate by personnel classification, by task

Please see the Frontier\_RREN-North\_Budget\_2024-2027.xlsx file that Frontier has provided, which contains the following:

- Quarterly task schedule
- Annual not-to-exceed amounts
- Detailed personnel-hour estimate by personnel classification, by task, by year, with relevant assumptions that informed our estimates
- 2024–2027 billing rates
- Non-labor costs
- Comparison of proposed annual budgets to RREN-North administrative budget from Proposed Decision

#### Non-labor expenses

Frontier proposes at least one in-person meeting annually with RREN-North, to be attended by two team members. As noted in the previous section, expenses are billed at cost with no additional markup.

Table 7: Frontier Energy Proposed Non-Labor Expenses (US\$), 2024-2027

Non-labor Cost	2024	2025	2026	2027
Travel for annual in-person meetings (2 FE attendees, airfare, ground transportation, lodging, meals)	XXXXX	XXXXX	XXXXX	xxxxx
Annual Totals	XXXXX	XXXXX	XXXXX	XXXXX

## E. Additions, Deletions and/or Exceptions

## **Exceptions and deletions (None)**

Frontier has no proposed revisions to RCEA's Standard Agreement. We have responded to every requested task and subtask from the RFP in full. At this time, we do not plan to pursue additional contracts with RCEA for program implementation or conducting of EM&V studies so there is no potential conflict with that work.

#### **Additions**

Where appropriate, we have added relevant subtasks to call attention to elements of the work that were not specifically mentioned in the RFP, including the items below. While these could reasonably be grouped under the umbrella of the requested services, we point them out here in case RCEA does *not* plan for the selected bidder to perform these specific activities. In that case we would be happy to remove these items from the scope and budget during contract negotiations.

Note that these items are color-coded in the Detailed Work Schedule and budget spreadsheet for ease of identification.

For additional information on these items, please see details provided in the Executive Summary, section "Services to be provided based on Frontier's understanding of the project scope":

- Under the existing subtask for "Review and provide feedback on adjustment to program metrics and targets" we have included the following:
  - o Developing REN unique value metrics per D.19-12-021.
- Under the existing subtask for "Assist with mid-cycle advice letter and associated reporting tables and appendices" we have included the following:
  - o True-up advice letter (Fall 2027)
- Under the existing subtask for "Assist with regulatory compliance based on current CPUC guidance" we have included the following:
  - CAEECC Presentation of AR: high-level overview of Annual Report (AR) at time of filing (D.23-06-055 at 27)
  - CAEECC AR Progress Update: update on progress, approx. 6 months after AR filing (D.23-06-055 at 27)
  - o OP 2: Joint PAs statewide program portfolio assessment process
  - OP 19: Non-energy benefit (NEB) indicators for equity segment: must track and report as of Q1 2028, prep in late 2027
  - o OP 23: Demographic Participation Information: coordinate through RPCG to submit report 9/1/2025, then propose approach in next BP February 2026
  - OP 24: Community Engagement Indicators: develop indicators and include in MCAL (Fall 2025), then report annually in ARs
  - OP 31: Community Programs: Joint PA coordination to structure process and propose in next BP February 2026

## **Appendix A: Required Forms**

- Exhibit A List of Subcontractors
- Exhibit B Firm's Business Information

## EXHIBIT A – LIST OF SUBCONTRACTORS

Frontier will not be using any subcontractors.

Subcontractor Name:
Services for which Subcontractor is being used:
Subcontractor qualifications:
Subcontractor's relevant experience (attach separate page(s), as needed):
Subcontractor Name:
Services for which Subcontractor is being used:
Subcontractor qualifications:
Subcontractor's relevant experience (attach separate page(s), as needed):
(ATTACH ADDITIONAL SHEETS IF MORE THAN TWO SUBCONTRACTORS ARE REQUIRED)

## EXHIBIT B - FIRM'S BUSINESS INFORMATION

Length of time your firm has been in business:	42 years
Length of time at current location:	Multiple locations - Current corporate structure since 4/1/2016
List types and business license number(s):	CA Domestic Corporation: C1099297
	CA DIR Number: 1000060131
Names and titles of all officers of the firm:	Adam Walburger - President Ron Snedic - Chairman Jeremy Springer - Chief Financial Officer Jung Lee - Secretary Jean Krausse - Vice President Alea German - Vice President Matt Haley - Vice President David Zabrowski - Vice President
Is your firm a sole proprietorship doing business under a different name? If yes, please indicate sole proprietorship name and the name you are doing business under:	□Yes ⊠No
Please indicate your Federal Tax Number:	94-2802034
Is your firm incorporated?	⊠Yes □No
Name and remittance address that will appear on invoices:	Frontier Energy, Inc. PO Box 530293 Atlanta, GA 30353-0293
Physical Address:	Multiple - CA corporate headquarters:
	Frontier Energy, Inc. 1075 Serpentine Lane, Suite B Pleasanton, CA 94566-4809

## **Appendix B: Resumes**

- Nancy Barba, Director/Lead
- Casey Carnes, Program Manager
- Margaret Marchant, Program Manager
- Aaron Jones, Program Consultant
- Jesse Farber-Eger, Program Consultant
- Tara Dufort, Program Consultant
- Emily Carter, Program Consultant



#### Nancy Barba

#### Director/Lead



#### **PROFILE**

Nancy Barba joined Frontier Energy in 2010. She brings a rich background in program management, stakeholder engagement, and community outreach to her role of Director with the Demand Side Management group. Her effective communication skills and facility to manage diverse priorities contribute to her engaged, results-driven leadership. She directs the delivery of program launch and implementation activities, marketing and outreach,

energy analysis, cost-effectiveness, and stakeholder relations. She works closely with utilities, regional energy networks, and community choice aggregators leading regulatory and technical support, program design, implementation, marketing and outreach, and financing.

#### EDUCATION/CERTIFICATIONS/TRAINING

B.S., Business Administration, California State University, Long Beach LEED AP O+M
Certified Green Building Professional
Certified GreenPoint Advisor

#### FRONTIER ENERGY EXPERIENCE

I-REN Codes & Standards Programs, Inland Regional Energy Network, February 2023 to Present

- Oversee activities to increase compliance with California Energy Code Title 24 Part 6.
- Support program strategy and implementation of trainings and forums for Codes & Standards curriculum.
- Direct technical assistance and reach code implementation support.

BayREN Codes & Standards Program, Bay Area Regional Energy Network, January 2022 to present

- Oversee activities to increase compliance with California Energy Code Title 24 Part 6.
- Support program strategy and implementation of trainings and forums for Codes & Standards curriculum.

Inland Regional Energy Network, Western Riverside Council of Governments, April 2019 to present

 Oversee and consult on regulatory activities; program design and development activities; and associated budgets, metrics, and energy savings.



Advise on regulatory matters, including proceedings, participation in the California Energy
Efficiency Coordinating Committee process, filing comments, and navigating regulatory the
complexities of becoming a CPUC-funded REN.

#### Tri-County Regional Energy Network, June 2018 to present

- Oversee and coordinate regulatory activities; program design and development activities; and associated budgets, contracts, and reporting.
- Support program design including measure selection and strategic customer engagement for workforce, single family, and multifamily programs.
- Support successful filings of annual budget advice letters, program implementation plans, joint cooperation memos, and other required regulatory documents for program administrators.

#### Bay Area Regional Energy Network, May 2021 to present

- Oversee and coordinate regulatory activities; program design and development activities; and associated budgets, contracts, and reporting.
- Support successful filings of annual budget advice letters, program implementation plans, joint cooperation memos, and other required regulatory documents for program administrators.

#### East Bay Community Energy Authority, October 2020 to present

• Oversee and consult on program design ideation, funding calculations, and advice letter to elect-to-administer energy efficiency programs for East Bay Community Energy Authority.

#### Redwood Coast Energy Authority, May 2021 to present

- Provide oversight to monthly, quarterly, and annual reporting support to the CPUC.
- Advise on program measure selection and implementation.
- Attend CPUC Reporting Peer Coordination Group calls, and all reporting subgroups, to keep clients informed of regulatory reporting updates and expectations.

#### The Energy Network (Southern California Regional Energy Network), January 2013 – May 2017

- Oversaw program design and implementation of energy efficiency retrofit incentive programs implemented in Los Angeles County. Led internal and external teams through design, implementation, and evaluation ensuring programs balance stakeholder responsiveness, high participation, and compliance with regulatory requirements.
- Oversaw the design and implementation of residential and commercial financing programs. Shaped contractor recruitment and engagement by directing resources and services to participating contractors. Activities included contractor account management oversight,



- systems and procedures management, pipeline design and management, investor relationship management, stakeholder coordination, and reporting oversight.
- Directed the design and implementation of marketing programs across a large investorowned utility territory. Marketing and outreach programs leverage a broad network of stakeholders including local governments, contractors, and community leaders. Programs are designed to engage and activate communities to participate in energy efficiency retrofit programs through The Energy Network's Home Upgrade and utility offerings.
- Managed procurement and contracts, including review of scopes of work, deliverables, negotiations, and coordinates necessary documents.



#### **Casey Carnes**

Program Manager



#### **PROFILE**

Casey Carmes is the go-to person for regulatory, technical, and programmatic questions. She has supported over ten energy efficiency programs across California during her eleven years with Frontier Energy. Her areas of expertise include regulatory reporting, incentive pipeline development, quality assurance protocols, and customer service.

Casey leads CEDARS reporting on behalf of five Portfolio Administrators including two RENs and three CCAs. She supported the filing of three EE Business Plans, helping her clients secure over \$100M in CPUC funding. She is a Salesforce Administrator who configures turn-key database solutions tailored to program and CEDARS reporting specifications.

#### EDUCATION/CERTIFICATIONS/TRAINING

B.A., Environmental Studies and Business Administration, Whittier College, CA Building Performance Institute (BPI) Building Science Principles Certificate Project Management Professional (PMP), Project Management Institute (PMI)

#### FRONTIER ENERGY EXPERIENCE

September 2013 to present

Bay Area Regional Energy Network (BayREN), May 2021 to December 2023

#### BayREN, May 2021 – December 2023

- Led monthly, quarterly, and annual reporting to the California Public Utilities Commission (CPUC).
- Supported program design and forecasting through the selection of cost-effective measures. Generated CET runs to maximize program cost-effectiveness ratings.
- Attended CPUC Reporting Peer Coordination Group calls to keep clients informed of regulatory reporting updates and expectations.

#### 3C-REN, January 2020 – present

- Support NMEC program implementation through incentive processing, review of program documentation, and regulatory reporting.
- Lead monthly, quarterly, and annual reporting to the CPUC.
- Configured program database to capture all required CPUC reporting inputs and satisfy EM&V requirements.



- Support program design and forecasting through the selection of cost-effective measures. Generate CET runs to maximize program cost-effectiveness ratings.
- Support annual budget filings.
- Attend CPUC Reporting Peer Coordination Group calls to keep clients informed of regulatory reporting updates and expectations.

#### I-REN, WRCOG, December 2021 - present

- Lead monthly, quarterly, and annual reporting to the CPUC.
- Support program design and forecasting through the selection of cost-effective measures. Generate CET runs to maximize program cost-effectiveness ratings.
- Support annual budget filings.
- Attend CPUC Reporting Peer Coordination Group calls, and all reporting subgroups, to keep clients informed of regulatory reporting updates and expectations.

#### MCE, May 2021 - present

- Lead monthly, quarterly, and annual reporting to the CPUC.
- Support program design and forecasting through the selection of cost-effective measures. Generate CET runs to maximize program cost-effectiveness ratings.
- Support annual budget filings.
- Attend CPUC Reporting Peer Coordination Group calls to keep clients informed of regulatory reporting updates and expectations.

#### San José Clean Energy, April 2022 – present

- Provide support with monthly, quarterly, and annual reporting to the CPUC.
- Attend CPUC Reporting Peer Coordination Group calls, and all reporting subgroups, to keep clients informed of regulatory reporting updates and expectations.

#### TECH Clean California, June 2021 – present

• Facilitated partnership between the California State Treasurer's Office and TECH Clean California to finance decarbonization projects statewide. This included drafting a contractual agreement between the parties, setting goals and expectations for the partnership.

#### Contractor Management, CAEATFA, California State Treasury, October 2017 – May 2022

- Worked with GoGreen Financing lenders to establish terms for promotional Interest Rate Buydown.
- Lead administrator of the Residential Energy Efficiency Loan (REEL) and Small Business Financing contractor management program database. Implement custom configurations to meet program specific needs. Train team members to navigate program database.
- Oversee quality assurance review of residential and commercial loan applications to ensure contractor compliance.



#### Margaret R. Marchant

Program Manager



#### **PROFILE**

Margaret brings 16 years of experience in the energy efficiency industry with expertise in program development and implementation, regulatory support, and strategic funding consulting. With diligent attention to detail and excellent communication skills, she excels in collaborating with clients including Community Choice Aggregators (CCAs), Regional Energy Networks (RENs), investor-owned utilities, municipal utilities, electric

cooperatives, private industry, electricity grid operators, non-profits and research institutions, state government offices, and the U.S. Department of Energy.

As a member of Frontier's Technical & Regulatory team, Margaret is responsible for analyzing impacts of regulatory guidance and providing recommendations to clients and program implementers. This work involves extensive research and analysis to inform stakeholders and give context to complex regulatory requirements, before obtaining decisionmaker buy-in and implementing best practices for compliance. Part of this work involves participation in Joint-Portfolio Administrator (PA) meetings and stakeholder working groups. Margaret is a vocal advocate for REN clients in stakeholder venues to ensure RENs have a seat at the table where decisions are made regarding their program portfolios and the communities they serve.

In her strategic funding consulting work, Margaret has successfully coordinated and drafted applications and advice letters resulting in hundreds of millions of dollars in ratepayer funding awarded to REN and CCA clients for energy efficiency programs. After obtaining funding for clients, Margaret provides regulatory support for program design, launch, and continued operations, including performance metrics and data collection.

## EDUCATION/CERTIFICATIONS/TRAINING

B.A., Liberal Arts Honors Program, the University of Texas at Austin, with Departmental Honors

#### FRONTIER ENERGY EXPERIENCE

I-REN Regulatory Support for REN Development and Program Launch, March 2022 to present

• Project Manager for REN development tasks and regulatory consulting to actualize the strategic interventions from their approved business plan and comply with CPUC



- requirements. Leadership for quick start tasks ordered by the CPUC in I-REN's approval decision, including development of implementation plans, metrics, program segmentation, and Joint Cooperation Memoranda.
- Ongoing support and oversight for implementation of I-REN's program portfolio and adherence to CPUC requirements in alignment with the REN's commitments to expanding equitable energy efficiency opportunities to hard-to-reach, underserved, and disadvantaged communities. Ongoing support includes advice letter development; annual report narrative drafting and coordination; facilitating coordination with utilities and other RENs in the Joint Cooperation Memoranda (JCM) process; developing and delivering presentations to committees of elected officials; stakeholder group participation; responses to CPUC evaluator and intervenor data requests; regulatory strategy guidance and contributions to CPUC pleadings, comments filings, and testimony; review of program implementation plans and narratives; and other regulatory consulting for program launches and implementation.
- Recent stakeholder group participation includes the Market Rate Non-Energy Benefits
  Working Group and Advice Letter; Awareness, knowledge, attitude, and behavior (AKAB)
  Study Advice Letter process; CAEECC Equity and Market Support Working Group; Equity
  and Market Support Goal Constructs Advice Letter; Data Working Group; Monthly Joint PA
  Meetings; and CalREN Quarterly Regulatory Meetings.

Tri-County Regional Energy Network (3C-REN) 2024-2031 Portfolio Application Filing and Ongoing Regulatory Support, July 2021 to present

- Frontier Energy team lead for developing 3C-REN's successful portfolio application filing for 2024-2031, including program ideation, strategy development, drafting program and policy narratives, and adherence to CPUC requirements, resulting in 3C-REN approval for over \$155 million in funding for energy efficiency programs.
- Oversight for technical and regulatory support of 3C-REN's expanded portfolio in compliance with regulatory requirements and in alignment with 3C-REN's commitments to expanding equitable energy efficiency opportunities to hard-to-reach, underserved, and disadvantaged communities.
- Ongoing support includes advice letter development; coordination with utilities and other RENs for Joint Cooperation Memorandum filings; stakeholder group participation; responses to CPUC evaluator and intervenor data requests; contributions to CPUC pleadings, comments filings, and testimony; and other regulatory consulting for program launches and implementation.



# 3C-REN Multifamily Home Energy Savings Program, June 2021 to present (under contract to Association for Energy Affordability)

• Frontier team lead with oversight for education and outreach; lead intake; database development and maintenance; and quality assurance. For program launch in Fall 2021, led the development of program implementation processes in coordination with 3C-REN and program partners. Drafted and implemented internal and customer-facing program documentation and data collection. Ongoing regulatory support to evolve program design in alignment with CPUC requirements and 3C-REN equity commitments.

#### 3C-REN Multifamily Market Characterization Study, July 2020 – October 2020

Coordinated project team performing market research tasks and deliverables including
market characterization, review of existing programs, potential electrification technologies,
implementer approaches, evaluation measurement and verification approaches, and program
recommendations. Led client meetings; performed research including interviews with
program administrators and implementers; authored deliverables; responded to client
feedback; and ensured timely delivery of work products meeting client expectations.

#### I-REN Business Plan Filing and Regulatory Support, November 2019 – January 2022

Lead author and coordinator for I-REN's Energy Efficiency Business Plan filing with CPUC, culminating in I-REN's approval as a Program Administrator and award of \$65 million in ratepayer funding to launch Public Sector, Workforce Education & Training, and Codes & Standards programs in alignment with CPUC goals to increase equity by serving hard-to-reach, underserved, Environmental and Social Justice communities, and disadvantaged communities.

#### BayREN Ad Hoc Regulatory Support & Coordination, May 2021 to March 2024

• Supported responses to data requests, coordinated with program teams for annual implementation plan updates, and advice letter filings.

#### CCA Elect to Administer Energy Efficiency Program Plans and Advice Letters (2020-2021)

- Clients for this work have included East Bay Community Energy (January 2021 to October 2021), San Jose Clean Energy (October 2020 to April 2021), and Clean Power San Francisco (January to November 2020).
- Responsible for developing written content, compiling, and editing content from client stakeholders, adhering to CPUC requirements, managing timelines, and collaborating with project management and engineering staff for program ideation and integration of program cost-effectiveness test results and documentation.



#### **Aaron Jones**

**Program Consultant** 



#### **PROFILE**

Aaron Jones has a background in guiding real estate and technology organizations on sustainable practices and Environmental, Social, and Governance (ESG) reporting. With a strong foundation in environmental science/policy and a keen understanding of corporate responsibility, Aaron provides regulatory compliance and reporting support to RENs at Frontier. Aaron has contributed to IDSM advice letters, and stakeholder meeting

participation. He works closely with 3C-REN for engagement in the OP 32 effort. He also contributes substantially to 3C-REN metrics support (common metrics, unique value metrics, and equity and market support indicators), including identifying relevant metrics, developing methodologies, advising program teams regarding data collection, creating metrics data collection templates, coordinating program team contributions to monthly, quarterly, and annual reporting. Aaron also developed an Equity Toolkit used in-house and by REN clients for identifying CPUC equity criteria by customer type.

#### **EDUCATION/CERTIFICATIONS/TRAINING**

M.S., Energy and Earth Resources, University of Texas at Austin, Austin, TX B.S., Earth Science, Vassar College, Poughkeepsie, NY ISO 14001 ISO 9001

#### **FRONTIER ENERGY EXPERIENCE**

November 2023 to present

Tri-County Regional Energy Network (3C-REN)

- Support monthly, quarterly, and annual reporting to the California Public Utilities Commission (CPUC).
- Facilitated the processing of incentives for Normalized Metered Energy Consumption (NMEC) programs, including overseeing quality assurance/quality control (QA/QC) processes, integrating data into Salesforce, and notifying program aggregators of expected incentive payments. Maintained smooth communication with stakeholders to ensure transparency and efficient processing.
- Assisted leading Joint Cooperation Memorandum including drafting memo, coordinating drafting meetings with investor-owned utilities (IOUs) as well as incorporating their feedback, and scheduling and leading ongoing coordination meetings. Collaborated closely



- with stakeholders to ensure alignment and mutual cooperation across participating organizations.
- Assisted in managing the OP 32 AL efforts by representing the client in sector meetings and discussions, reviewing draft versions, providing detailed feedback, and coordinating with other program administrators (PAs) to address and prevent program duplication. Facilitated collaboration to ensure distinct program offerings and compliance with regulatory requirements.
- Assisted in developing and refining methodologies for collecting data to report on Equity and Market Support Indicators. Collaborated with internal teams to define key metrics, identify data sources, and ensure accurate and comprehensive reporting of equity-related outcomes.
- Provided CPUC regulatory support on an as-needed basis, including reviewing filings, preparing documentation, and addressing inquiries. Played a critical role in ensuring that client responses were compliant with CPUC standards and contributed to broader regulatory engagement strategies.

#### PRIOR EXPERIENCE

Cirrus Logic, ESG/Investor Relations Associate, Austin, TX, February 2022 – July 2023

- Managed engagement with rating agencies, indices, and disclosure organizations, including monitoring, analyzing, and expanding disclosures to improve scores (Bloomberg, CSA, ISS, MSCI, and Sustainalytics).
- Supported development of decarbonization strategy to meet emissions reduction target.
- Developed process for efficient collection of relevant ESG data and content; managed data collection process through Workiva.
- Supported development, creation, and promotion of annual ESG report.
- Participated in ESG-related projects with other departments (ISO14001 certification and Code of Conduct audits).
- Developed and lead sustainability employee resource group.
- Prepared ESG-related materials for board presentations and corporate website.

RE Tech Advisors (Formerly LORD Green Real Estate Strategies), Sustainability Associate, Dallas, TX, November 2020 – January 2022

- Daily direct communication with clients' (J. P. Morgan, AXA Investment Managers, Granite REIT, and AEW) ESG+R Team/Leader.
- Managed performance component and assisted with management component of GRESB submission for core, value-add, and opportunistic funds resulting in increased data coverage and score/ranking improvement for clients.



- Developed and implemented ESG+R strategies and initiatives (decarbonization, TCFD, and reduction goals in alignment with the Paris Accord and Science Based Target Initiatives) for clients' ESG+R Team/Leader.
- Developed and produced annual GRI aligned reports and green building certification (GBC) budget analysis reports as well as quarterly sustainability KPI, investor report ESG+R inserts, and GBC reports for clients.
- Managed energy, GHG emissions, water, and waste data for over 390 million square feet of real estate, including multifamily, commercial, industrial, office, and retail using ENERGY STAR Portfolio Manager.
- Reviewed and ensured property level compliance of U.S./Canadian building energy performance, disclosure, and audit ordinances and mandates.
- Vetted ESG+R technology vendors and lead pilot programs for clients.

Blue Ocean Energy Management, Sustainability Manager, Austin, TX, August 2019 – November 2020

- Managed and supervised monthly sustainability and utility data reporting to commercial real
  estate clients.
- Conducted GAP analyses and provided documentation for 3rd party green building certification (LEED and EPA Energy Star).
- Benchmarked and managed commercial properties' ENERGY STAR Portfolio Manager accounts and certifications.
- Ensured client compliance with U.S. energy performance, disclosure, and audit ordinances and mandates.
- Trained and managed three sustainability associates.

#### **TECHNICAL SKILLS**

- Technologies: ENERGY STAR Portfolio Manager, Excel, Power BI, Measurabl, SAP, Tableau, and Workiva.
- ESG Reporting and Disclosure: CDP, ESG Ratings and Rankings, GRESB, GRI, SASB, SFDR, UNPRI, and UNSDG.



### Jesse Farber-Eger

#### **Program Consultant**



#### **PROFILE**

Jesse Farber-Eger has over five years of experience in the energy industry, primarily supporting business operations for community choice aggregation (CCA) in California. He has managed stakeholder relations with local agencies, utilities, and end users, overseeing call center operations, providing subject matter expertise for Net Energy Metering customers, and navigating utility databases to generate reports and facilitate billing. At Frontier, Jesse

carries out regulatory reporting and deciphers the latest policy developments for regional energy networks and CCAs.

#### EDUCATION/CERTIFICATIONS/TRAINING

B.A., Sociology, University of Tennessee in Knoxville B.A., German, University of Tennessee in Knoxville

#### FRONTIER ENERGY EXPERIENCE

June 2023 to present

#### Inland Regional Energy Network

- Support regulatory and technical reporting.
- Support and represent client in California Energy Efficiency Coordinating Committee working group and other stakeholder meetings.
- Provide policy updates and set timelines for regulatory deliverables.
- Assisted with filing of Advice Letter, program segmentation, and metrics attachment.

#### Ava Community Energy

- Support regulatory and technical reporting.
- Assist with review of Normalized Metered Energy Consumption (NMEC) and Strategic Energy Management (SEM) program documentation.

#### MCE Community Choice Energy

• Support regulatory and technical reporting for client's NMEC and SEM programs.

#### TECH Clean California Initiative

• Provide data analytics for TECH financing of Go Green Home enrolled loans.



#### PRIOR EXPERIENCE

Energy Advisor, GridX, Monterey, CA, January 2019 – October 2023

- Supervised call center of 4–6 for CCA client.
- Supported billing operations and business intelligence for over 400k utility meters.
- Created reports and dashboards to identify key performance indicators and enable client to manage utility portfolio and support customer retention.
- Worked with programmers to test new software, tools, and variables while supporting database quality assurance.



#### Tara Dufort

**Program Consultant** 



#### **PROFILE**

Tara Dufort's expertise in project accounting and administration has been employed across multiple programs since she joined Frontier Energy in March 2023. She quickly assumed key responsibilities as a program consultant, and administrative technical advisor for the Inland Regional Energy Network (I-REN) Codes & Standards, and Implementation programs. She worked for the I-REN programs to support the development of project

financial reporting processes, templates and automations to support monthly and quarterly California Public Utilities Commission (CPUC) reporting.

#### EDUCATION/CERTIFICATIONS/TRAINING

A.A., Psychology, Inverhills Community College Certificate in Small Business Development, Business Administration and Management

#### FRONTIER ENERGY EXPERIENCE

March 2023 to present

Project Consultant, I-REN Codes & Standards and Implementation Programs, July 2024 to present

- Assist with regulatory and financial reporting structures, development of templates and procedures.
- Assist with monthly, quarterly, and annual regulatory and financial reporting.

Project Controller, I-REN Codes & Standards and Implementation Programs, March 2023 – July 2024

- Assist with regulatory and financial reporting structures, development of templates and procedures.
- Assist with monthly, quarterly, and annual regulatory and financial reporting.



#### PRIOR EXPERIENCE

Nerdy Pest Solutions, Boss Lady - Head Herder, March 2023 – present

Environmental Pest Management Systems, Operations Manager, September 2018 – April 2022

- Secured two PPP Loans and 100% forgiveness.
- Designed a custom application using Caspio to manage largest client with a customer portal.
- Oversaw the change to BrioStack as the company CRM, including going paperless.
- Trained staff on new digital processes.
- Created protocols to navigate evolving Covid requirements on an Essential Service Business.
- Ensured the business office remained operational during two Covid outbreaks.
- Converted Sales Tax from Accrual to Cash basis to improve cash flow.
- Executed digital campaign for prepayments and monthly payment plans to ensure continuous cash flow during off season.
- Created HR system and processes to automate several payroll functions.



#### **Emily Carter**

**Program Consultant** 



#### **PROFILE**

Emily Carter brings technical knowledge of building science and energy modeling to support Frontier clients' energy efficiency initiatives. Her expertise lies in thermal envelopes, renewable energy, and HVAC systems for single family, multifamily, and commercial buildings. Emily utilizes this knowledge to address gaps in achieving energy efficiency measures including Title 24 Part 6 code compliance, Energy Star, and Department of

Energy's Zero Energy Ready programs. Emily has also participated in various solar rebate and tax programs including Self-Generation Incentive Program (SGIP) and utility incentives. At Frontier, Emily supports the Inland Regional Energy Network (I-REN) by providing technical assistance for the energy code, tracking equity and market segment indicators, and developing an evaluation, measurement, and verification (EM&V) plan for I-REN's three sectors. Emily also supports regional energy networks (RENs) by drafting public comments for code cycles and ensuring they stay informed about relevant rulemakings that impact their programs.

#### EDUCATION/CERTIFICATIONS/TRAININGS

M.S., Environmental Policy and Management, University of Denver B.S., Biology, University of California at Los Angeles Home Energy Rating System (HERS) Energy Modeler Certification

#### FRONTIER ENERGY EXPERIENCE

I-REN, Codes & Standards Program, January 2024 to present

- Provide technical support for reach codes development and code assistance.
- Track equity and market support segment indicators.
- Support planning for trainings and forums; develop and teach trainings.
- Create and implement education and outreach strategies.
- Assist with stakeholder engagement and materials development.

### I-REN, EM&V Studies, February 2024 to present

- Develop an EM&V plan for all three of I-REN's sectors.
- Plan individual EM&V studies for each of I-REN's sectors.
- Propose budgets and implementation plans for each EM&V study.

#### Code and Regulations Support, February 2024 to present

• Monitor California Energy Commission (CEC) and air quality management district (AQMD) rulemakings for REN program impacts.



• Draft public comments on behalf of RENs for code cycles.

#### **PRIOR EXPERIENCE**

Senior Energy Modeling Analyst, Quality Built, LLC, 2021 – December 2023

- Conducted energy performance simulations to ensure code compliance, aligning with federal and state regulations, and specializing in California's Title 24, Part 6 code.
- Consulted with clients regarding renewable energy initiatives, energy efficiency standards, and federal legislation, such as the Inflation Reduction Act.
- Interpreted building science and performance data to offer clients energy conservation solutions.

Solar Program Administrator, Promise Energy, Inc., 2018 – 2021

- Managed solar rebate and tax credit programs for multifamily affordable housing developments through California utility rebates and federal programs.
- Interpreted Title 24, Part 6 energy code compliance sheets to determine solar systems for multifamily homes, single family homes, and commercial buildings.
- Collaborated with utility companies to determine energy efficiency solutions for clients.

Climate Action Associate, LA Regional Collaborative for Climate Action and Sustainability (LARC), 2017 – 2018

- Supported executive management in the preparation for climate conferences.
- Coordinated events and handled logistical and administrative duties.

Appendix C: Letter of Support				
•	Association for Energy Affordability (AEA)			

5900 Hollis Street, Suite R2, Emeryville, CA 94608 • Phone: 510-431-1791 • aea.us.org

September 16, 2024

Redwood Coast Energy Authority 633 3rd Street Eureka, CA 95501

Subject: Letter of Support - RFP-24-601

Dear Redwood Coast Energy Authority:

The Association for Energy Affordability (AEA) is pleased to provide this letter of support for Frontier Energy's (Frontier's) proposal in response to RFP-24-601 "Administration Support Services for the Rural Regional Energy Network North."

AEA is a 31-year-old 501(c)(3) non-profit technical services and training organization at the forefront of increasing energy efficiency and electrification in low-income communities. Since 1992, AEA has carried out a broad range of activities and programs benefiting low-income multifamily residences including: conducting energy audits; performing energy analysis; conducting research and demonstration of advanced residential building technologies; monitoring and verification; delivering hundreds of technical trainings; and overseeing the construction and installation of heat pump space and water heating systems, high performance envelope, and ventilations systems addressing comfort, durability, safety, indoor air quality, and environmental impact.

We have full confidence in working with Frontier and their ability to provide support services related to the administrative processes associated with operating a Regional Energy Network (REN). Over the past ten years, Frontier has worked with (and in some cases continues to support) all the local governments who now form Southern California REN, Bay Area REN, Tri-County REN and Inland REN (I-REN). In 2019 Frontier provided regulatory guidance and consulting to Western Riverside Council of Governments (WRCOG) and their partner agencies in the process to pursue the REN funding pathway for energy efficiency program administration. Frontier now serves as the lead consultant for REN development and program launch and is currently leading the development of initial program metric targets and coordinating meetings between the I-REN partner agencies. AEA has closely collaborated with Frontier as part of AEA's implementation in the BayREN Multifamily Program, 3C-REN Multifamily Program, the SMUD Multifmaily Program, the MCE Multifamily Program, and TECH Clean California. Frontier Energy will also be a key subcontractor in the Equitable Building Decarbonization Program's Northern Region which was recently awarded to AEA.

Based on our knowledge of the team and the project, we believe it will achieve Redwood Coast Energy Authority's mission to develop and implement sustainable energy initiatives that reduce energy demand, increase energy efficiency, and advance the use of clean, efficient, and renewable resources available in the region.

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