Commenter Name: Lara Ettenson Commenter Affiliation: NRDC Date: 11/19/16

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NRDC-1	3CREN	Res	Overarching (Tracker)	 It's unclear why a REN is needed for this effort. There is no provided analysis or summary of the explicit challenges to warrant a new entity. This sounds like an intriguing program that could be accomplished through a local government partnership. P. 21 - Unclear if the budget is being requested solely from the CPUC or if it includes the other sources noted above. If just from the CPUC, it seems quite high – especially without any information on the savings or cost-effectiveness. How did the 3C REN coordinate the development of this plan with their respective overlapping utilities to ensure this really is filling a gap vs. being duplicative? NRDC presume the BP will comply with the business plan checklist and expectations for citations for barriers, trends, etc. as well as and references to evaluation lessons.