

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider
New Approaches to Disconnections and
Reconnections to Improve Energy Access
and Contain Costs.

Rulemaking 18-07-005
(Filed July 12, 2018)

**COMMENTS OF THE CALIFORNIA COMMUNITY CHOICE ASSOCIATION
ON THE ORDER INSTITUTING RULEMAKING**



August 9, 2018

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Pursuant to the above-captioned *Order Instituting Rulemaking to Consider New Approaches to Disconnections and Reconnections to Improve Energy Access and Contain Costs* (“OIR”), the California Community Choice Association (“CalCCA”)¹ hereby submits these comments.²

Electricity is a basic necessity in Californians’ daily lives and critical to the economic and social health of the State.³ Increasing the affordability of clean energy is a founding principle of CalCCA’s members, and our organization is actively working to reduce costs for all customers – not only those being served by community choice aggregators (“CCAs”). Our members advocate for customers within their service territories, and, because CCAs are not burdened by the need to generate shareholder returns, they are naturally aligned with their customers’ needs.

¹ CalCCA is a nonprofit organization formed in June 2016 to represent the interests of California’s community choice aggregation programs in regulatory and legislative matters. Its members include the operational community choice aggregators (“CCAs”) in California: Apple Valley Choice Energy, CleanPowerSF, Clean Power Alliance, Lancaster Choice Energy, East Bay Community Energy, Marin Clean Energy, Monterey Bay Community Power, Peninsula Clean Energy Authority, Pioneer Community Energy, Pico Rivera Innovative Municipal Energy, Redwood Coast Energy Authority, San Jose Clean Energy, Silicon Valley Clean Energy Authority, Sonoma Clean Power Authority, and Valley Clean Energy Alliance.

² R.18-07-005, *Order Instituting Rulemaking to Consider New Approaches to Disconnections and Reconnections to Improve Energy Access and Contain Costs*, (July 12, 2018), pp. 18-19, Order Paragraph 7 (“Disconnections and Reconnections OIR”).

³ R.18-07-006, *Order Instituting Rulemaking to Develop Methods to Assess the Affordability Impacts of Utility Rate Requests and Commission Proceedings*, (July 23, 2018), p. 3, quoting Pub. Util. Code § 382(B).

As such, CalCCA’s members strongly support the aims of both the OIR and SB 598 to reduce the number of customers experiencing disconnection after nonpayment and to improve the reconnection processes and outcomes for those customers that have already been disconnected.⁴

The Commission’s OIR encourages the participation of CCAs in this proceeding,⁵ and we welcome the opportunity to work with you. Specifically, CalCCA stands ready to assist the Commission in providing information that may help illuminate the most significant drivers and root causes of disconnections.⁶ Our hope is that the critical issues to be addressed in this proceeding will foster a cooperative environment where all parties work toward achieving the Commission’s goals of providing “rapid relief” to residential customers (Phase 1) and implementing best practices (Phase 2).⁷ We agree the best framework for the proceeding is the consideration of parties’ and Energy Division’s proposals through comments and workshops.⁸

We also plan to participate in the Commission’s affordability rulemaking, R.18-07-006, which will develop overarching policies and affordability metrics in all sectors of utility service to provide an honest assessment of Californians’ ability to meet their most basic needs. Given the increasing cost of electric utility services and overall surge in cost of living in the State, the Commission is wise to open these Rulemakings now.

I. Categorization, Scope and Need for Hearing

CalCCA agrees with the quasi-legislative categorization of this proceeding, believes the issues listed in the OIR’s preliminary scoping memo are comprehensive and appropriately framed, and concurs that hearings are unnecessary at this time.

⁴ Disconnections and Reconnections OIR at 1.

⁵ *Id.* at 18.

⁶ *Id.* at 4.

⁷ *Id.* at 11.

⁸ *Id.* at 19.

II. Communications

CalCCA consents to “e-mail only” service and requests that the following individuals be added to the service list for R.18-07-005 on behalf of CalCCA:

Party Representative:

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III. Conclusion

CalCCA appreciates the Commission’s consideration of these comments and looks forward to working with the Commission and parties on the critical issues addressed herein.

Respectfully submitted,

/s/ Beth Vaughan

Beth Vaughan
Executive Director
California Community Choice Association

Dated: August 9, 2018.