BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement Senate Bill 237 Related to Direct Access.	Rulemaking 19-03-009 (Filed March 14, 2019)

COMMENTS OF CALIFORNIA COMMUNITY CHOICE ASSOCIATION ON THE PROPOSED DECISION

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May 20, 2019

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Pursuant to Rule 14.3 of the California Public Utilities Commission ("Commission") Rules of Practice and Procedure and the email of Administrative Law Judge ("ALJ") Powell, dated April 15, 2019, California Community Choice Association ("CalCCA") respectfully submits the following comments on the Proposed Decision issued on April 29, 2019 ("PD") and provides factual support as permitted by ALJ Powell's email. Pursuant to Rules 1.15 and 14.3, these comments are timely filed.

CalCCA supports the proposed two-year roll-out of the 4,000 gigawatt hour ("GWh") direct access ("DA") enrollment. This multi-year phase-in is consistent with past Commission precedent and the requests of various parties to this proceeding.

CalCCA recommends several modifications to the approach taken in the PD to address infirmities with the PD and to align it with existing Commission rules and process. In these comments, CalCCA requests that the Commission:

- implement the existing precedent of Resolution E-4907 for roll-outs of DA load departures;
- provide Community Choice Aggregators ("CCAs") with information on the DA waitlist necessary to engage in risk mitigation, load planning, and resource procurement;

- provide that CCAs concurrently receive a copy of any notice of intent to transfer ("NOI") and direct access service request ("DASR") approved by an Investor Owned Utility ("IOU") for any CCA customer;
- adopt CalCCA's Proposal of a cap on DA departures in CCA service territory consistent with other limits on DA departures;
- address CalCCA's switching rule modification in Phase 2 of the docket as stated in the Scoping Memo;
- clarify that a DA customer maintain its vintage when it takes service from a CCA; and
- launch of Phase 2 no later than third quarter of 2019.

I. JANUARY 2020 ENROLLMENT (PD SECTION 3.2)

A. SB 237 Does Not Require a Departure from the Commission's Practice with Respect to Resource Adequacy Requirements

The PD asserts that the exception from the requirement to provide year-ahead Resource Adequacy ("RA") forecasting is in order "[t]o comply with provisions of SB 237."[1] No provision of SB 237 requires an exception from this requirement. The law simply requires that "on or before June 1, 2019, the commission shall issue an order regarding direct transactions…."[2] This provision can be met by issuing a decision by June 1, 2019 which lays out a plan for implementation of SB 237. As is done elsewhere in the PD, the implementation plan of SB 237 should include ways in which SB 237 can be harmonized with other statutory provisions and Commission principles.[3]

[1] Proposed Decision at 11, emphasis added.
[2] Public Utilities Code Section 365.1(e).
[3] *See, e.g.,* PD at 18-19 (implementing the 4,000 GWh roll-out on a two-year timeframe).

B. SB 237 and Commission Precedent Support the Need for Additional Lead Time Prior to DA Load Departures to Ensure RA Compliance and Prevent Cost Shifting

The Commission has previously recognized the need for appropriate lead time for RA procurement, and in particular the year-ahead RA forecasting requirement. In Decision ("D.") 05-10-042, the Commission clearly stated:

> We recognize that a key issue for LSEs is their need to receive final, adjusted load forecasts from the CEC by July 1 to allow them sufficient time for final resource acquisition and a showing of such acquisition on September 30. This means that the LSEs' preliminary forecasts need to be submitted by the April 1 to May 1 period.[4]

In fact, the Alliance for Retail Energy Markets ("AReM") who has supported the expedited departure of DA in this proceeding previously opposed shortened timelines that would not allow for enough time to transact for RA resources. In D.11-06-022, AReM argued that "late notification of final RA requirements would further delay the IOU's process for selling excess Local RA to other LSEs, and otherwise limit the ability of LSEs to make the necessary RA purchases." [5]

This need for sufficient time to procure is particularly necessary in the current tight RA market. According to the Commission's RA Waivers and Penalties website, "[a] number of entities have requested year-ahead local, system, and flexible waivers for the 2019 compliance year."[6] In a tight RA market the risks to all load-serving entities ("LSEs") and ratepayers are higher – namely, the stranded costs of over-procurement and the penalty costs of under-procurement. By adopting the PD's timeline, the Commission could exacerbate RA market pressures by forcing more market players to compete in an already tight RA market in an unnecessarily compressed timeframe. This approach will likely result in increased costs for ratepayers, cost shifts to IOU and CCA customers

[4] D.05-10-042 at 82-83, emphasis added.
[5] D.11-06-022 at 38-39.
[6] https://www.cpuc.ca.gov/General.aspx?id=6442460914.

due to unnecessary procurement for load that will be departing to DA, and increased numbers of RA waiver requests. These risks would be mitigated by maintaining and applying the existing rules for forecasting and departure equally to all LSEs.

C. To Avoid Cost Shifting and Discriminatory Treatment, the Commission Should Apply the Requirements Set Forth in Resolution E-4907 to DA Roll-Outs

The Commission already has in place procedures for load departures to avoid cost shifts and align departures with existing Commission RA requirements – Resolution E-4907. As a matter of sound policy and nondiscrimination, the Commission should apply consistent regulatory requirements for RA procurement for all departing loads. The Commission, through Resolution E-4907, implemented a process and timeline for CCAs specifically to ensure the CCAs "comply with Resource Adequacy requirements, as established in Section 380, before they serve customers."[7] The same compliance issues apply to DA load departures, and therefore the same rules should apply, regardless of whether the load departs for DA or CCA. The Commission's proposal for the roll-out of Phase 1, however, diverges from the timeline established in Resolution E-4907, and is inconsistent with prior Commission RA decisions. The Phase 1 proposal in particular waives the requirement for the April year-ahead forecasting of RA requirements. As discussed above in Section I.B., this is particularly problematic in the current tight RA market.

The PD should be revised to adopt a timeline consistent with Resolution E-4907 and prior Commission decisions to provide market stability, avoid stranded costs and avoid disparate treatment of LSEs that are similarly situated.

[7] Resolution E-4907 at 1.

D. The PD's Basis for Not Applying Resolution E-4907 Is Flawed

The PD argues that a departure from the procedures in Resolution E-4907 for Energy Service Providers ("ESPs") is appropriate because ESP volumes are capped.[8] First, this is irrelevant because Resolution E-4907 applies to the departure of any CCA load of any size, no matter how much or how little departs in a year.

Second, this is based upon a false premise because, for any particular CCA, the volume of DA able to depart is effectively uncapped. The PD appears to presume that the amount of load departure from any one CCA will approximate the amount of load departure from the IOU service territory overall. This assumption, however, is contrary to the data available in this proceeding. The data set forth in Appendix 1 demonstrate that potential departures to DA are not proportionately borne by each LSE. An individual CCA could see load departures at higher magnitudes than the two percent anticipated by the Legislature and at a level that is difficult to plan for RA acquisition, and unnecessarily disruptive to the CCA, particularly in the shortened planning timeframe the PD adopts. This is discriminatory. While the PD asserts that it seeks to allow "equal access to the DA program," it places a heavy hand on the scale in favor of the large IOUs and the small IOUs to the detriment of CCAs. While the Commission has implemented a not-to-exceed cap for IOUs pursuant to the PD and entirely exempted small IOUs from DA departure, the Commission provides no such certainty or protections to the CCAs.

[8] "While the CCAs provide one year's notice for departing load, they are also permitted to operate without a cap on load that is permitted to depart bundled service; accordingly, they are not similarly situated to ESPs." PD at 11.

II. PCIA VINTAGE (PD SECTION 3.4.1)

A. CalCCA Requests That the Commission Further Clarify the PCIA Vintage Issue

The PD makes clear that if a CCA customer departs to DA, that customer maintains its vintage. The PD states: "[T]he vintage assigned to a customer who leaves an IOU's bundled service to join a CCA will not change when that customer leaves that same CCA's territory to join the DA program." [9]

However, the PD does not clarify the corollary of this concept where a DA customer moves to CCA. While currently implicitly stated, CalCCA requests that the Proposed Decision make explicit that a DA customer that takes service from a CCA maintains its vintage when it moves from service from an ESP to a CCA. As AReM stated in comments, "a customer on CCA service has already exercised its election to leave utility bundled service… Therefore, when the customer then elects to take service from an ESP, that election should not trigger a reassignment of their PCIA vintage."[10] Similarly, a DA customer has already exercised its option to leave bundled utility service, so an election to CCA should also not trigger a reassignment of their PCIA vintage.

III. WAITLIST DISCLOSURE (PD SECTION 3.4.3)

CalCCA thanks the Commission for acknowledging that "for procurement planning purposes, it is reasonable for CCAs to have advance notice of customer load that may depart CCA service as part of the DA expansion."[11] However, the Commission's proposed solution that CCAs receive only "aggregate load data" is insufficient.[12]

[9] PD at 23.
[10] AReM Opening Comments on the Order Instituting Rulemaking ("OIR") at 6-7.
[11] Proposed Decision at 26.
[12] Proposed Decision at 26.

A. Aggregated Information Fails to Provide Many CCAs with Even the Load Expected to Depart

CalCCA has sought aggregated information from Pacific Gas & Electric Company ("PG&E") and Southern California Edison Company ("SCE"). The resulting data request responses demonstrate that aggregated information is not sufficient. As a result of the 15/15 rule,[13] many CCAs simply would not be informed of what loads are expected to depart from their territory. SCE, for example, aggregated all CCAs together, so no one CCA knows what their expected load departure would be.[14] Similarly, through PG&E's application of the 15/15 Rule, four of the twelve CCAs in PG&E's service area do not know what their expected load departure would be.[15] This situation particularly impacts the smallest of the CCAs for whom the departure of large commercial or industrial customers would have the most significant impact.

B. Providing Customer-Specific Data to CCAs Does Not Violate Confidentiality

CCAs already have access to customer-specific information and are subject to the confidentiality requirements of the Commission.[16] While the PD acknowledges the need for CCAs to have data for procurement planning purposes, it fails to provide CCAs with specific information –including waitlist rank, demand, location, customer type, load shape, and other customer characteristics – that a simple aggregated consumption amount (kWh) does not provide.

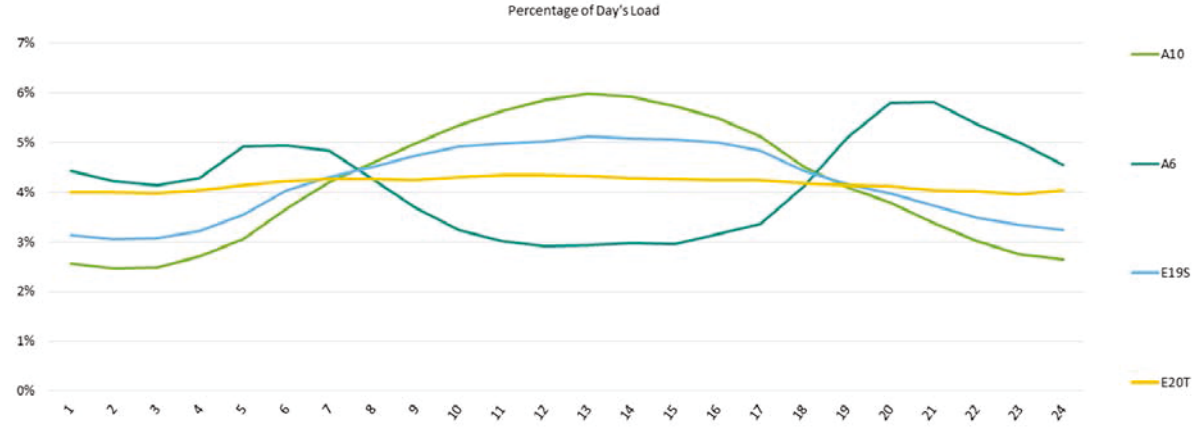
To accurately forecast their load and peak demand, procure resources to serve their customers, and optimize their portfolios, CCAs need data that reflect which customers are on the

[13] "The "15/15 Rule" is a screen that requires that any aggregated customer-confidential information provided by the utilities be made up of at least fifteen customers, and that a single customer's load be less than fifteen percent of an assigned category. This tool was established in the Direct Access Proceeding via Decision (D.) 97-10-031." D.14-11-001 at 5, Footnote 8.
[14] See Attachment D.
[15] See Attachment C.
[16] *See, e.g.*, D.12-08-045 and the Community Choice Aggregator Non-Disclosure Agreement for each IOU.

DA waitlist to assess effects on load shape and the waitlist positions of those customers to assess likelihood of departure. This information enables CCAs and IOUs to plan and mitigate risk for the benefit of all customers and overall system reliability. Without granular information, the CCAs do not have enough data from which to plan or run scenarios.

While a simple MWh amount will allow a CCA to determine the potential impact to aggregate annual energy needs, this information is insufficient for resource and reliability planning. Commercial and industrial customers are not uniform in terms of demand on an hourly, daily, or seasonal basis. An aggregate departure of 50 GWh will have a different impact on the CCA's energy and Resource Adequacy requirements if it represents a large industrial customer with flat, round-the-clock consumption than if it represents a group of office buildings with lower load factors and mid-day peaks. Load profiles can differ dramatically across customer types as shown in Figure 1 below which sets forth the load shapes for commercial and industrial customers of Silicon Valley Clean Energy based upon customer data for a randomly selected weekday in July 2018. Additionally, some DA-eligible customers have more seasonal demand, whereas others have consistent needs throughout the year.

Figure 1.
Load Shapes of Commercial and Industrial Customers of Silicon Valley Clean Energy, July 2018



IOUs currently benefit from this information and can use it to determine how customer departures will impact their MW of peak load for Resource Adequacy filings, as well as their MWh of daily and monthly energy needs. Likewise, ESPs that are actively contracting with DA-eligible customers have knowledge of these customers' identities and their likely impact on capacity and energy requirements. CCAs are asking for the same information so that they can also contribute to maintaining system reliability.

CalCCA believes there are ways to provide customer-specific information to CCAs without violating any privacy or confidentiality provisions of the Commission. First, for the customers they serve, CCAs should receive the NOI to transfer to DA concurrently with the IOU. This information is the earliest indication of the amount of load that could potentially depart from CCA service and would allow for CCAs to plan for the potential range of departures it may face as soon as possible. Such forward-looking information on potential departures is a necessary piece of information for the CCA to have to engage in risk management over the coming years as load departs under the DA expansion.

Second, relevant information regarding the waitlist should be provided to the LSEs that serve them. Specifically, the proposal made by the University of California ("UC") in their Opening Comments should be adopted, namely, that the lottery position and associated MWh for those accounts on the DA wait list should be public.[17] The UC's proposal does not create confidentiality or 15/15 Rule issues. The proposal does not contain any customer-identifiable data; it contains only load and queue position. The only necessary modification to this proposal is that this information needs to be associated with the current LSE. As such, a CCA would receive a confidential table that provides the lottery position and the customer account number for each of

[17] UC Opening Comments on the OIR at 4.

its customers on the waitlist. CCAs do not need to have access to the other components of the waitlist that are not relevant for their resource planning.

C. CCAs Should Receive DASRs When They Are Received by IOUs

The PD also fails to provide CCAs with customer-specific information even after that current CCA customer has made a binding decision to depart from CCA service. Under the PD's proposal, a CCA would only receive aggregated information of departing load by July 15, 2019. Yet, the customer's DASR would be submitted to the IOU by July 31, 2019. Under this process, CCAs do not receive copies of DASRs for their customers, even though at this point the customer's departure is certain. Rather, CCAs will learn that a customer has left only through its billing operations – *i.e.*, electronic data interchange ("EDI") transfers with the IOU – which occur after the customer has already moved to an ESP. This illustrates another instance of disparate treatment among LSEs; CCAs are placed at a disadvantage relative to IOUs because CCAs would not be concurrently privy to the same information as the IOUs while being similarly situated to the IOUs with respect to load departures.

At the point a customer's ESP issues the DASR, the customer has decided and reached a "point of no return," and the affected CCA should be immediately informed of the proposed switching date. CalCCA requests that the Commission direct the IOUs to provide such DASRs to the relevant CCAs.

For example, PG&E Electric Rule 22.E.7 could be revised as follows:[18]

> PG&E will provide an acknowledgment of its receipt of the DASR to the ESP within two (2) working days of its receipt. PG&E will exercise best efforts to provide, within three (3) working days thereafter (and no later than five (5) working days), the ESP and the customer with a DASR status notification informing them as to whether the DASR has been accepted, rejected or deemed pending further information. As of July 1998, PG&E will provide this DASR status notification

[18] The corresponding sections for the other IOUs are SCE Electric Rule 22.E.7 and SDG&E Electric Rule 25.E.7.

> within three (3) working days. If accepted, the switch date determined in accordance with paragraphs 12 or 13 of this section, will be sent to the ESP, the former ESP **or community choice aggregator (CCA)**, if applicable, and the customer. If a DASR is rejected, PG&E will provide the reason for the rejection. If a DASR is held pending further information, it shall be rejected if the DASR is not completed within eleven (11) working days following the status notification.

Until such changes are made to the Electric Rules, however, the IOUs should be directed to provide approved DASRs to the CCA serving that customer.

IV. DISPARATE IMPACT ON CCAS AND THE CCA CAP (PD SECTION 3.4.6)

A. Preventing Disparate Impacts on CCAs Is Consistent with and Supported by Commission Precedent

In its comments in this proceeding, CalCCA proposed "that the Commission protect against an allocation of the 4,000 GWh on any one CCA in excess of its fair share. This is to ensure that CCAs also do not face disparate impacts."[19] The PD asserts that "implementing such a cap would be unduly discriminatory as eligible DA customers would be denied the ability to choose to join the DA program solely on the basis that a CCA in [sic] entitled to a 'fair share' of that customer's load."[20]

First, CalCCA's position is to prevent disparate impacts on a CCA in a manner similar to the protection IOUs receive from unconstrained load departures due to the Legislature placing an overall cap of approximately 2% on departures from their service territories.

Second, such a cap is not "unduly discriminatory." In fact, it is the failure to adopt a CCA-specific cap that is unduly discriminatory. Notably, each large IOU has a specific cap. Small and multi-jurisdictional IOUs ("SMUs") are exempt from DA altogether. The approach proposed by CalCCA would allow customers to depart under a reasonable cap; whereas the Commission for

[19] CalCCA Opening Comments on the OIR at 6.
[20] PD at 31.

SMUs has implemented a blanket prohibition on DA, fully eliminating choice for customers in those jurisdictions.

Third, the data provided in this proceeding support CalCCA's assertion that certain CCAs will bear a disproportionate burden of departures to DA on expedited timelines. In its opening comments, CalCCA provided information regarding the impacts on different CCAs. This concern is substantiated by the data as described in Section VI and is reflected in Appendix 1.

Most importantly, because the second expansion of DA proposed in the PD will occur under a refreshed waitlist within the lottery system, it is entirely unclear how much load will be subject to departure within any specific CCA. Without a reasonable cap in place, no CCA will be able to plan for anticipated load departures.

B. Recommending that CCAs Impose Exit Fees Is Not the Answer; Good Planning and Fair Rules Are

The PD states that "CCAs should consider revising their risk management plans or implementing mechanisms that are similar to the regulatory framework established for PCIA."[21] This proposal raises a number of legal, policy, and procedural issues significantly beyond the scope of this proceeding, but more fundamentally, this is not customer-friendly. Adding yet another charge to customer bills will add to customer confusion and inability to easily compare LSEs on an apples-to-apples basis. Additionally, to implement this approach, the Commission would need to direct all IOUs to modify their tariffs and make any technology or billing infrastructure upgrades to ensure that the approach could be seamlessly implemented. This is likely impossible to implement within the next several months before DA is re-opened and will result in unnecessary expense to all utility customers.

[21] PD at 31-32.

A far better approach is to modify the PD to provide CCAs with the data they need to appropriately plan. CalCCA believes it is prudent for CCAs to plan for load departures, and mitigate the negative impacts of departures, rather than proposing to laden customers with more fees, which needlessly increases the risk of customer confusion and litigation over the terms of another exit fee.

V. PHASE 2 – RECOMMENDATION TO LEGISLATURE ON INCREASING DIRECT ACCESS (PD SECTION 3.4.5)

A. CalCCA Recommends that the Commission Ensure Sufficient Process in Phase 2 to Ensure There Is the Evidentiary Support Necessary for the Findings Required by Section 365.1("f")(2)

CalCCA supports the launch of Phase 2 of the proceeding no later than the end of the third quarter of 2019. CalCCA supports a robust stakeholder process to develop the recommendation to the Legislature. It will be essential to have evidence on the record in order to make the findings required by Section 365.1("f")(2):

> In developing the recommendations pursuant to subdivision (f), the commission shall find all of the following:
> (A) The recommendations are consistent with the state's greenhouse gas emission reduction goals.
> (B) The recommendations do not increase criteria air pollutants and toxic air contaminants.
> (C) The recommendations ensure electric system reliability.
> (D) The recommendations do not cause undue shifting of costs to bundled service customers of an electrical corporation or to direct transaction customers.

Each of the four areas described in Section 365.1("f")(2) requires findings that are supported by facts and evidence. It is likely that evidentiary hearings will be required for this phase and the Commission should plan accordingly. The findings and recommendations need to be subject to a robust discussion and record to ensure the state can continue to meet reliability and GHG reduction goals while ensuring fair treatment of residential and other customers that do not depart for DA service.

B. The DA-CCA Switching Issue Should Be Addressed in Phase 2 Pursuant to the Scoping Memo

CalCCA opposes the improper disposition of the issue of switching between DA and CCA service as currently set forth in the PD.[22] The Scoping Memo issued on April 17, 2019 ("Scoping Memo") provided that "the Commission will consider CalCCA's fourth and fifth [pertaining to DA-CCA switching] issues when it finalizes the scoping memo for Phase 2."[23] Rather than considering this issue in Phase 2, based on additional input, facts and support, the PD prematurely denies the proposal. The PD's disposition of the DA-CCA issue should be modified so the matter can be properly addressed in Phase 2.

Rule 7.3 of the Rules of Practice and Procedure provides that a scoping memo "shall determine the… issues to be addressed." Here, the Scoping Memo provides that the matter of DA-CCA switching would be addressed in Phase 2, not in the PD. The California Court of Appeals has found – even in a quasi-legislative proceeding – that where the Commission has addressed matters "beyond the scope of issues identified in the scoping memo" the Commission has "failed to proceed in the manner required by law [(§ 1757.1(a)] and that the failure was prejudicial."[24]

VI. RESPONSE TO REPLY COMMENTS OF THE DIRECT ACCESS CUSTOMER COALITION

On April 12, 2019, CalCCA requested the opportunity to file a Response to the Reply Comments by the Direct Access Customer Coalition ("DACC") to address erroneous statements of DACC.[25] DACC called into question the veracity and the reliability of the information set forth

[22] PD at 27.
[23] Scoping Memo at 3.
[24] *S. California Edison Co. v. Pub. Utilities Com.*, 140 Cal. App. 4th 1085, 1106 (2006).
[25] DACC Reply Comments at 3.

by CalCCA without providing support for DACC's own assumptions in their Reply Comments. As DACC stated:

> Furthermore, the factual assertions that CalCCA has made regarding the potential load losses that individual CCAs might experience are anecdotal at best and likely represent hypothetical worst-case scenarios for a small number of CCAs. In any event, the Commission cannot reasonably view these unverified and unvetted claims as informative, much less reliable, for its deliberative purposes.[26]

On April 15, 2019, ALJ Powell via email stated that "CalCCA may address this issue in its comments to the PD." Attached to these Comments are the data substantiating CalCCA's assertions regarding the disparate impact CCAs would bear under the PD.

DACC's reply comments regarding the veracity of CCA data is baseless. As demonstrated in Appendix 1, several CCAs bear greater than a proportionate share of DA departures, and some bear triple the proportion of departures the IOU would face.[27] The departure amounts for each CCA in SCE's service territory is entirely unknown since, pursuant to the 15/15 Rule, SCE aggregated information across all of the SCE-area CCAs. [28]

VII. CONCLUSION

CalCCA thanks Assigned Commissioner Picker and Assigned Administrative Law Judge Powell for the opportunity to provide these comments on the Proposed Decision.

[26] DACC Reply Comments at 3.
[27] For purposes of this filing, we use data pertinent to CCAs located in Pacific Gas & Electric's ("PG&E's") footprint since that is the CCA-specific data available to CalCCA at this time. CalCCA notes that information for King City Community Power cannot be provided publicly at this time due to the Commission's rules on confidentiality.
[28] See Attachment D.

Respectfully submitted,

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May 20, 2019

Appendix 1
Expected Departures of DA Load from CCAs in PG&E Territory

Community Choice Aggregator	2019 Energy (GWh) [A]	2019 Waitlist (GWh) [B]	2019 Waitlist Expected to Clear (GWh) (Proposed Decision) [C]	% of Load on 2019 Waitlist [D]	% of Load Expected to Clear from 2019 Waitlist (Proposed Decision) [E]
Clean Power San Francisco	2,666	142	31	5.33%	1.16%
East Bay Community Energy	5,699	393	188	6.90%	3.30%
King City Community Power	37	*	*	*	*
Marin Clean Energy	5,275	158	60	3.00%	1.14%
Monterey Bay Community Power	3,218	105	41	3.26%	1.27%
Peninsula Clean Energy	3,609	134	16	3.71%	0.44%
Pioneer Community Energy	1,138	32	*	2.81%	*
Redwood Coast Energy Authority	699	7	*	1.00%	*
San Jose Community Energy	3,338	142	43	4.25%	1.29%
Silicon Valley Clean Energy	3,974	482	21	12.13%	0.53%
Sonoma Clean Power	2,532	86	25	3.40%	0.99%
Valley Clean Energy	744	32	*	4.30%	*

Column A: The expected 2019 load of each CCA in PG&E's service area in GWh. This is derived from PG&E's Energy Resource Recovery Account ("ERRA") Testimony prepared for the ERRA "November Update." The relevant excerpt from PG&E's Testimony is set forth as Attachment A.

Column B: The load (in GWh) on the waitlist by CCA currently serving that load. This is set forth in the response of PG&E to CalCCA's Data Request CalCCA_001-Q04 which is set forth as Attachment B.

Column C: The amount of load expected to clear off the waitlist in each CCA's territory based on the load PG&E expects to clear off the 2019 Waitlist under the Proposed Decision. This is set forth in the response of PG&E to CalCCA's Data Request CalCCA_003-Q01 which is set forth as Attachment C.

Column D: The percent of each CCA's load on the 2019 Waitlist. [Column D] = [Column B] / [Column A]

Column E: The percent of each CCA's load on the 2019 Waitlist expected to clear based on the Proposed Decision. [Column E] = [Column C] / [Column A]

Attachment A
PG&E ERRA Testimony Excerpt

Application: 18-06-001
(U 39 E)
Exhibit No.: PG&E-6
Date: November 7, 2018
Witness(es): Various

PACIFIC GAS AND ELECTRIC COMPANY

UPDATE TO PREPARED TESTIMONY

2019 ENERGY RESOURCE RECOVERY ACCOUNT AND GENERATION NON-BYPASSABLE CHARGES FORECAST AND GREENHOUSE GAS FORECAST REVENUE RETURN AND RECONCILIATION

PUBLIC VERSION

TABLE 2-3
2019 ENERGY (GIGAWATT HOUR)
PEAK DEMAND MW REQUIREMENTS

2019 ENERGY REQUIREMENTS (GWH)

Line No.	Description	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	**Energy Load (GWh)**													
2	Retail Sales													86,600
3	Conservation and Energy Efficiency	(346)	(346)	(346)	(346)	(346)	(346)	(346)	(346)	(346)	(346)	(346)	(346)	(4,155)
4	Distributed Generation													
5	Solar	(72)	(85)	(140)	(160)	(187)	(192)	(195)	(182)	(157)	(136)	(96)	(81)	(1,682)
6	CHP	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(54)
7	Fuel Cell & Other	(18)	(18)	(18)	(18)	(18)	(18)	(18)	(18)	(18)	(18)	(18)	(18)	(217)
8	Electric Vehicles	36	36	36	36	36	36	36	36	36	36	36	36	436
9	Electrification	2	2	2	2	2	2	2	2	2	2	2	2	23
10	Direct Access													
11	Direct Access	(747)	(758)	(758)	(784)	(803)	(830)	(861)	(873)	(863)	(805)	(792)	(759)	(9,631)
12	Community Choice Aggregation													
13	Marin Clean Energy	(475)	(411)	(402)	(403)	(410)	(454)	(495)	(494)	(474)	(403)	(414)	(441)	(5,275)
14	Sonoma Clean Power	(221)	(194)	(206)	(191)	(195)	(212)	(222)	(218)	(214)	(211)	(208)	(240)	(2,532)
15	Clean Power San Francisco	(175)	(177)	(166)	(212)	(238)	(236)	(233)	(249)	(243)	(237)	(248)	(252)	(2,666)
16	Peninsula Clean Energy	(320)	(303)	(285)	(288)	(283)	(288)	(296)	(313)	(309)	(295)	(310)	(318)	(3,609)
17	Silicon Valley Clean Energy	(334)	(318)	(304)	(309)	(314)	(335)	(346)	(342)	(363)	(335)	(335)	(339)	(3,974)
18	Redwood Coast Energy Authority	(61)	(54)	(60)	(58)	(58)	(57)	(58)	(57)	(56)	(60)	(58)	(62)	(699)
19	Pioneer Community Energy	(95)	(82)	(76)	(76)	(86)	(104)	(122)	(122)	(110)	(81)	(86)	(96)	(1,138)
20	Monterey Bay Community Power	(257)	(225)	(248)	(254)	(282)	(285)	(301)	(297)	(275)	(274)	(256)	(264)	(3,218)
21	Valley Clean Energy	(53)	(46)	(47)	(49)	(61)	(75)	(88)	(84)	(70)	(59)	(54)	(58)	(744)
22	East Bay Community Energy	(504)	(486)	(446)	(457)	(442)	(464)	(489)	(502)	(482)	(458)	(467)	(501)	(5,699)
23	King City Community Power	(3)	(3)	(3)	(3)	(3)	(3)	(3)	(3)	(4)	(3)	(3)	(3)	(37)
24	San Jose Community Energy	(13)	(13)	(165)	(322)	(324)	(362)	(386)	(395)	(373)	(320)	(325)	(341)	(3,338)
25	UFE, Transmission & Distribution Losses													3,493
26	Total Requirement													41,884

Attachment B
PG&E Data Request Response CalCCA_001-Q04

PACIFIC GAS AND ELECTRIC COMPANY
Direct Access OIR SB 237
Rulemaking 19-03-009
Data Response

PG&E Data Request No.:	CalCCA_001-Q04		
PG&E File Name:	DirectAccessOIR-SB-237_DR_CalCCA_001-Q04		
Request Date:	March 21, 2019	Requester DR No.:	001
Date Sent:	April 2, 2019	Requesting Party:	California Community Choice Association
PG&E Witness:		Requester:	Elizabeth Kelly

QUESTION 04 – DA WAITLIST

With regards to your DA waitlist that went into effect on January 1, 2019, please provide the following, in each case providing an explanation of the figures or any methodologies used to derive the figures.

A. The total amount of GWh on the waitlist.

B. The total amount of GWh on the waitlist by LSE currently serving that load (i.e. by CCA and by you.)

C. The total number of service accounts on the waitlist by LSE currently serving that load.

ANSWER 04

A. The total amount of load on the waitlist that went into effect on January 1, 2019 is 3,637 GWh based upon billed usage in 2018.

B. The total amount of GWh (rounded to the nearest GWh) on the waitlist by LSE currently serving the load is shown in the table below;

LOAD SERVING ENTITY	LOAD (GWh)
Clean Power San Francisco	142
East Bay Clean Energy	393
Monterey Bay Community Power	105
MCE Clean Energy	158
Peninsula Clean Energy	134
Pioneer Community Energy	32
Redwood Coast Energy	7
Sonoma Clean Power	86
San Jose Clean Energy	142
Silicon Valley Clean Energy	482
Valley Clean Energy Authority	32
PG&E	1924

C. The total number of service accounts on the waitlist by LSE currently serving that load is shown in the table below:

LOAD SERVING ENTITY	No Of SA IDs
Clean Power San Francisco	493
East Bay Clean Energy	1015
Monterey Bay Community Power	818
MCE Clean Energy	779
Peninsula Clean Energy	525
Pioneer Community Energy	187
Redwood Coast Energy	60
Sonoma Clean Power	463
San Jose Clean Energy	307
Silicon Valley Clean Energy	609
Valley Clean Energy Authority	135
PG&E	7069

*** Note The total GWh and SA ID counts for King City Community Power were omitted per the 15/15 rule adopted by the CPUC. PG&E believes this is more appropriate than aggregating the load with another CCA provider.

Attachment C
PG&E Data Request Response CalCCA_003-Q01

PACIFIC GAS AND ELECTRIC COMPANY
Direct Access OIR SB 237
Rulemaking 19-03-009
Data Response

PG&E Data Request No.:	CalCCA_003-Q01		
PG&E File Name:	DirectAccessOIR-SB-237_DR_CalCCA_003-Q01		
Request Date:	May 1, 2019	Requester DR No.:	003
Date Sent:	May 8, 2019	Requesting Party:	California Community Choice Association
PG&E Witness:		Requester:	Elizabeth Kelly

QUESTION 01 – UPDATED WAITLIST CLEARING FIGURES

Please provide the aggregated GWh (rounded to the nearest GWh) by LSE of the load PG&E expects to clear off the 2019 Waitlist under the Phase 1 Increase as set forth in the Proposed Decision issued on April 29, 2019.

ANSWER 01

PG&E estimates that it will have a new direct access allowance of 937 GWh based upon proposed Overall DA Load Cap of 10,457 GWh for 2019 and its total direct access load of 9,695 GWh as of March 2019.

PG&E is providing the aggregated GWh (rounded to the nearest GWh) by Load Serving Entity (LSE) of the load PG&E expects to clear off the waitlist. In the table below, PG&E used a total allocation of 925 GWh as the total load of the next customer on the 2019 Wait List would cause PG&E to exceed the Overall DA Load Cap of 10,457 GWh.

LOAD SERVING ENTITY	LOAD (GWh)
Clean Power San Francisco	31
East Bay Clean Energy	188
King City Community Power ***	0
Monterey Bay Community Power	41
MCE Clean Energy	60
Peninsula Clean Energy	16
Pioneer Community Energy ***	0
Redwood Coast Energy ***	0
Sonoma Clean Power	25
San Jose Clean Energy	43
Silicon Valley Clean Energy	21
Valley Clean Energy Authority ***	0
PG&E	492
Total:	925

*** Note: The total GWh for King City Community Power, Pioneer Community Energy, Redwood Coast Energy and Valley Clean Energy Authority shows as zero (0) per the 15/15 rule adopted by the CPUC. PG&E believes this is more appropriate than aggregating the load with another CCA provider.

Attachment D
SCE Data Request Response CalCCA-SCE-004 Q1

Southern California Edison
R.19-03-009 – SB 237 OIR

DATA REQUEST SET C a l C C A - S C E - 0 0 4

To: CalCCA
Prepared by: Estella Banuelos
Job Title: Senior Analyst
Received Date: 5/1/2019

Response Date: 5/8/2019

Question 01:
Please provide the aggregated GWh (rounded to the nearest GWh) by LSE of the load SCE expects to clear off the 2019 Waitlist under the Phase 1 Increase as set forth in the Proposed Decision issued on April 29, 2019.

Response to Question 01:
The table below provides the aggregated load, organized by LSE of the load, that SCE expects to clear off the 2019 Waitlist under the Phase 1 Increase as set forth in the Proposed Decision issued on April 29, 2019.

LSE	Annualized Load Offering GWh
SCE / DA	1,465
CPA / RMEA / AVCE / LCE / PRIME / SJP**	277
Total	1,742

**These LSEs were combined in the table above due to customer confidentiality concerns, pursuant to the "15/15 Rule" adopted by the Commission in D.97-10-031.

Customer Confidentiality: The IOUs are authorized to provide aggregated usage data to the extent customer confidentiality is not compromised. The "15/15 Rule" was adopted by the CPUC in the Direct Access Proceeding (CPUC Decision 97-10-031) to protect customer confidentiality. The 15/15 Rule requires that any aggregated information provided by the IOUs without customer written authorization must be made up of at least 15 customers and a single customer's load must be less than 15 percent of an aggregated category. If the number of customers in any one group falls below 15, or if a single customer's load accounts for more than 15 percent of the total group data, data must be further aggregated before the information is released. If the 15/15 Rule is triggered for a second time after the data has been screened once already using the 15/15 Rule, the Rule further requires that the customer be dropped from the aggregated data. The 15/15 Rule ensures that the identity of larger customers are protected from disclosure.