

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

Order Instituting Rulemaking to Review, Revise,
and Consider Alternatives to the Power Charge
Indifference Adjustment.

R.17-06-026

**REPLY COMMENTS OF CALIFORNIA COMMUNITY CHOICE ASSOCIATION
ON PROPOSED DECISION CONSIDERING WORKING GROUP PROPOSALS ON
DEPARTING LOAD FORECAST AND PRESENTATION OF POWER CHARGE
INDIFFERENCE ADJUSTMENT RATE ON BILLS AND TARIFFS**

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Pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure, the California Community Choice Association (“CalCCA”) ¹ respectfully submits these reply comments on the proposed *Decision Considering Working Group Proposals on Departing Load Forecast and Presentation of Power Charge Indifference Adjustment Rate on Bills and Tariffs* (“Proposed Decision”).

I. INTRODUCTION

CalCCA supports the Commission’s adoption of the Proposed Decision without modification as a reasonable resolution of Working Group 1 Issues 8-10 and 12. These comments reply to the Joint Utilities’ proposal to modify the Proposed Decision’s disposition of Issue 12.² In particular, the Joint Utilities propose to remove the requirement to implement, by the last business day of 2021, a joint proposal to show a power charge indifference adjustment

¹ California Community Choice Association represents the interests of 19 community choice electricity providers in California: Apple Valley Choice Energy, CleanPowerSF, Clean Power Alliance, Desert Community Energy, East Bay Community Energy, Lancaster Choice Energy, Marin Clean Energy, Monterey Bay Community Power, Peninsula Clean Energy, Pioneer Community Energy, Pico Rivera Innovative Municipal Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Jacinto Power, San Jose Clean Energy, Silicon Valley Clean Energy, Solana Energy Alliance, Sonoma Clean Power, and Valley Clean Energy.

² *Opening Comments of Pacific Gas and Electric Company (U 39 E), Southern California Edison Company (U 338 E), and San Diego Gas & Electric Company (U 9002 E) on Proposed Decision on Departing Load Forecast and Presentation of Power Charge Indifference Adjustment Rate on Bills and Tariffs*, Mar. 16, 2020 (“Joint Utilities Comments”), at 3.

(“PCIA”) line item in the tariffs and bill summary table on all customer bills. The Commission should reject the Joint Utilities’ proposal as an unsupported attempt to continue their pattern of delay on this issue.

II. THE COMMISSION SHOULD REJECT THE JOINT UTILITIES’ PROPOSAL TO FURTHER DELAY IMPLEMENTATION OF A PCIA LINE ITEM ON ALL CUSTOMER BILLS

The Proposed Decision requires the Joint Utilities to submit a joint proposal for bill and tariff changes to show a PCIA adjustment line item in their tariffs and bill summary table on all customer bills.³ It makes crystal clear when and how the Joint Utilities must proceed in meeting this requirement, providing: “Each utility shall submit a Tier 3 Advice Letter by August 31, 2020, to implement the joint proposal by the last business day of 2021.” The Commission should adopt the Proposed Decision’s recommendation without change, rejecting the Joint Utilities’ attempt to further delay implementation of this important bill feature.

The Proposed Decision is not the Joint Utilities’ first notice that a PCIA line item on bills was in their future. CalCCA proposed in its opening testimony in R.17-06-026 on April 2, 2018, “that the Commission require the Joint Utilities to present uneconomic portfolio costs as a separate line item on bundled customer bills to better align customer understanding of the rates they pay.”⁴ CalCCA explained the reasoning underlying this proposal:

“[T]he current utility bill presentation masks the fact that all customers are shouldering the burden of the utility’s uneconomic costs,” and “without explanation, customers might erroneously conclude that CCA customers are required to pay additional costs not included in bundled service.”⁵

³ Proposed Decision, Ordering Paragraph 2, at 29.

⁴ See D.18-10-019 at 118.

⁵ *Id.*

The Joint Utilities, expressing support for greater rate and bill transparency, urged the Commission not to adopt the proposal but to hold workshops “to identify the impacts of this change on existing GRC Phase 2 settlements and the Joint Utilities' tariffs and billing systems, so that a more informed and thoughtful approach can be taken”⁶ While CalCCA did not oppose a workshop process, it requested that the Commission set a deadline for implementation, which it did not.⁷

The issue of bill presentation was fully discussed during Working Group One meetings, with conclusions summarized in the Working Group One’s final report. Notably, the presentation entitled “Bill Presentation: IOU Perspective,” attached to the Final Report, laid out the Joint Utilities’ concerns about making the change, noting Customer Information System (“CIS”) “freezes” in 2020 and the backlog of billing system changes that are pending.⁸ While PG&E showed long lists of priorities in 2019 and 2020, its presentation did not suggest it could not complete the task by the end of 2021.⁹ SDG&E suggested that even taking into account its CIS freeze, changes to its billing system could be made after the second quarter of 2021.¹⁰ SCE proposed to defer the change to its 2021 General Rate Case Phase 2 proceeding,¹¹ which should – barring all delays – be implemented effective January 1, 2021. In other words, despite their continuing protest, there was tacit agreement that there was no barrier to implementation of the PCIA line item by the end of 2021. Contrary to the Joint Utilities’ contention otherwise, the

⁶ See Proposed Decision at 118.

⁷ See *id.*

⁸ *Pacific Gas and Electric Company (U 39-E) and California Community Choice Association Working Group One Report on Issues 8-12*, Jul 1, 2019 (“Final Report”), beginning at C-62.

⁹ *Id.* at C-62 – C-64.

¹⁰ *Id.* at C-66.

¹¹ *Id.* at C-67.

record *does* “support a Finding of Fact that a PCIA line item on bills and tariffs is feasible by the end of 2021.”¹²

Moreover, the Joint Utilities’ complaints cannot be easily substantiated through publicly available information. PG&E claims it is “currently working through an unprecedented backlog of billing system and billing statement changes” – a backlog that is opaque to other parties. Indeed, there is no indication of whether the utility even tried to incorporate the mandated PCIA change into its plans over time. The Joint Utilities’ claim that “there *may* be utility-specific technological constraints that require additional timing flexibility,”¹³ without any explanation or documentation of those constraints. They further state, referencing a communication in a different proceeding, that “SCE shared with Commission decisionmakers its current anticipated timeline for implementation of its Customer Service Re-Platform project.”¹⁴ It is interesting that the Joint Utilities can claim, on one hand, that the Proposed Decision lacks a factual basis and, on the other, provide excuses for foot-dragging that are entirely outside of the record.

By the Proposed Decision’s mandated implementation date, the Joint Utilities will have had *more than three years* to develop a proposal and get the implementation scheduled. But now, as they did in Phase 1 and the Phase 2 Final Report, the Joint Utilities protest any firm implementation date. The Commission should reject their pleas for further delay and adopt the Proposed Decision without modification.

¹² Joint Utilities Comments at 4.

¹³ Joint Utilities Comments at 4.

¹⁴ *Id.*

III. CONCLUSION

For the foregoing reasons, CalCCA requests that the Commission adopt the Proposed Decision without change.

Respectfully submitted,

CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

A handwritten signature in blue ink that reads "Evelyn Kahl".

Evelyn Kahl
General Counsel

March 23, 2020