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

Order Instituting Rulemaking to Continue  
Electric Integrated Resource Planning and  
Related Procurement Processes.

R.20-05-003

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION  
COMMENTS ON THREE-YEAR PLANNING SCHEDULE**

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July 6, 2020

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The California Community Choice Association (CalCCA)<sup>1</sup> submits these comments in response to Rule 6.2 of the Commission’s Rules of Practice and Procedure, the *Order Instituting Rulemaking to Continue Electric Integrated Resource Planning and Related Procurement Processes* (OIR), and the *Administrative Law Judge’s Ruling Scheduling Prehearing Conference and Seeking Comments on the Proposed Proceeding Schedule*, issued on June 15, 2020 (Ruling).

**I. THE COMMISSION SHOULD FURTHER EXPLORE IMPLEMENTATION OF A THREE-YEAR IRP CYCLE**

The Ruling proposes to replace the current two-year Integrated Resource Planning (IRP) cycle with a three-year cycle, beginning with the current cycle.<sup>2</sup> At this point, based on the high-level outline provided in Attachment A to the Ruling, CalCCA is interested in the three-year cycle. A three-year cycle more realistically reflects the time needed to ensure a robust planning process and would place more reasonable demands on limited Commission and stakeholder

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<sup>1</sup> California Community Choice Association represents the interests of 20 operational 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, Valley Clean Energy, and Western Community Energy.

<sup>2</sup> Ruling, Attachment A.

resources. Careful alignment with California Independent System Operator planning processes, however, will be critical to the IRP's success.

Initially, one area of the plan raises concern: the frequency of opportunity and justification for the Commission to order new procurement. The justification for the proposed windows of opportunity lacks clarity. It is essential that any procurement order be supported by a data-based analysis vetted through a public process. In addition, the number of opportunities for procurement orders in the early part of the process appears excessive. For example, a need determination based on the "analysis of aggregated plans" can trigger an order to procure in Q2 2021. What appears to be a separate need determination, "triggered by PSP analysis," could result in a new procurement order in Q3 2021. Issuing two procurement orders in a single year would create confusion and planning disruption. A more reasonable objective would be to choose a single point within each planning cycle, such as when the PSP is adopted, when the need for procurement would be determined, tightly constraining any opportunity for "emergency" procurement orders.

Among the Commission's goals in refining the IRP process, CalCCA requests that the Commission place reasonable notice and a data-based, publicly vetted analysis of required procurement at the top of its list. The procurement order issued in Decision (D.)19-11-016 was relatively sudden, with very little time for compliance. "Emergency" notices disrupt normal planning processes and carry the potential to significantly increase costs to ratepayers. For these reasons, CalCCA requests that the Commission create a clear process for triggering new procurement with sufficient lead time to enable reasonable, cost-effective compliance by load-serving entities. CalCCA looks forward to further exploration of this issue as the proceeding unfolds.

## **II. LOAD-SERVING ENTITIES NEED MORE THAN ONE CALENDAR QUARTER TO DEVELOP THEIR INDIVIDUAL IRPS**

Attachment A of the Ruling proposes that load-serving entity IRP filings be due May 1 (Q2 2023). However, Attachment A also lists the Reference System Portfolio (RSP) adoption, which would contain filing guidance as occurring in Q1 2023.<sup>3</sup> Assuming the RSP adoption occurs at the start of Q1, the proposed schedule gives load-serving entities only one calendar quarter to model cases, review, re-run cases as needed, fill out filing requirement data templates, conduct stakeholder engagement, and have their plans approved by their organization's management.

This timing is contrary to the Ruling's stated intent for proposing a three-year cycle: "allow[ing] time for LSEs to use" the RSP and alleviate the "time crunch" caused by a two-year cycle.<sup>4</sup> A persistent issue the IRP cycle has faced is the adoption of the RSP occurring too close to the IRP filing deadline and the issuance of the final filing requirements and templates occurring months after the RSP is adopted. CalCCA requests that the RSP be adopted at the end of the RSP development year (i.e., Q4 2022). Shifting the adoption back one calendar quarter would give load-serving entities a realistic amount of time to develop their plans. Furthermore, CalCCA requests that all filing requirements and templates be finalized when the RSP is adopted. This will allow load-serving entities to begin preparing their individual IRPs without the risk of having the templates or requirements adjusted partway through plan preparation.

## **III. CONCLUSION**

CalCCA appreciates the opportunity to provide comments on the OIR and Ruling.

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<sup>3</sup> Ruling, Attachment A, p. 4.

<sup>4</sup> Ruling, p. 4.

Respectfully submitted,

A handwritten signature in blue ink that reads "Evelyn Kahl". The signature is written in a cursive style.

Evelyn Kahl  
General Counsel to the  
California Community Choice Association

July 6, 2020