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

Application of SAN DIEGO GAS &
ELECTRIC COMPANY (U902E) for
Approval of its 2021 Electric Procurement
Revenue Requirement Forecasts and GHG-
Related Forecasts.

Application 20-04-014

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION
MOTION FOR PARTY STATUS**

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August 3, 2020

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**CALIFORNIA COMMUNITY CHOICE ASSOCIATION
MOTION FOR PARTY STATUS**

This motion is filed pursuant to Rule 1.4(a)(4) of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission) on behalf of California Community Choice Association (CalCCA).

I. DESCRIPTION OF CALIFORNIA COMMUNITY CHOICE ASSOCIATION

California's community choice aggregators (CCAs) are local governmental entities that provide electricity services to their residents pursuant to Public Utilities Code Section 366.2. CCAs are currently serving about 10 million customers in more than 170 cities and counties across California.

CalCCA was formed in 2016 as a trade organization to facilitate joint participation in certain regulatory and legislative matters in which members share common interests. CalCCA's voting membership includes CCAs serving load and others in the process of implementing new service, including: 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 Diego Community Power, San Jacinto Power, San José Clean

Energy, Silicon Valley Clean Energy, Solana Energy Alliance, Sonoma Clean Power, Valley Clean Energy, and Western Community Energy. San Diego Community Power, which is a member of CalCCA, intends to launch service to customers within the San Diego Gas & Electric Company (SDG&E) service territory in 2021. Other members serve customers in the Pacific Gas and Electric Company (PG&E) and Southern California Edison Company (SCE) service territory.

II. CALCCA’S INTEREST IN THE PROCEEDING

CalCCA seeks party status in this proceeding to address issues related to the Power Charge Indifference Adjustment (PCIA) rate, which will be set for 2021 in this proceeding. CalCCA’s interests center on whether SDG&E has calculated the PCIA consistent with applicable Commission decisions in R.17-06-026, a proceeding in which CalCCA has been an active party. CalCCA is also interested in ensuring consistency of application of the PCIA methodologies across the service territories of all three investor-owned utility service territories where member CCAs provide service.

III. STATEMENT OF FACTUAL AND LEGAL CONTENTIONS

CalCCA contends that SDG&E’s proposed PCIA Rates are not just and reasonable, consistent with the law, and compliant with the rules governing PCIA calculation established in Decisions (D.) 18-10-019 and D.19-10-001. Consequently, these rates fail to adequately prevent impermissible shifting of costs from bundled to departing load customers. Any other contentions ultimately advanced by CalCCA will fall squarely within the scope of Issues 1-4 and 9 delineated in the Scoping Memo.¹

¹ *Scoping Memo and Ruling of Assigned Commissioner*, July 6, 2020, at 2-3.

IV. NO PREJUDICE TO OTHER PARTIES

CalCCA’s contentions will be reasonably pertinent to the issues already within the scope set by the Assigned Commissioner, and CalCCA does not seek to alter the scope of this proceeding. In addition, CalCCA does not intend at this time to file separate testimony but plans to participate in briefing and comments on the November update consistent with the existing schedule. Consequently, CalCCA’s participation will not prejudice other parties to this proceeding.

V. NOTICE

CalCCA requests that all correspondence, pleadings, notices, orders, rulings, and other communications concerning this proceeding be emailed to the following:

Evelyn Kahl, General Counsel
California Community Choice Association
One Concord Center
2300 Clayton Road, Suite 1150
Concord, CA 94520
regulatory@cal-cca.org

VI. CONCLUSION

CalCCA respectfully requests approval of this motion to become a party.

Respectfully submitted,



Evelyn Kahl
General Counsel to the
California Community Choice Association

August 3, 2020