

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



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Application of Southern California Edison
Company (U 338-E) For Approval of Its
Forecast 2021 ERRRA Proceeding Revenue
Requirement.

Application 20-07-004

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION
PROTEST TO THE APPLICATION OF SOUTHERN CALIFORNIA EDISON
COMPANY (U 338-E) FOR APPROVAL OF ITS FORECAST 2021 ERRRA
PROCEEDING REVENUE REQUIREMENT**

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August 5, 2020

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Pursuant to Rule 2.6 of the Rules of Practice and Procedure of the Public Utilities Commission of the State of California (Commission), the California Community Choice Association (CalCCA) hereby submits this protest to the above-captioned *Application of Southern California Edison Company (U 338-E) For Approval of Its Forecast 2021 ERRA Proceeding Revenue Requirement (Application)*.

CalCCA protests the Application on grounds that further review and analysis is required to determine that relief Southern California Edison Company (SCE) requests is just and reasonable,¹ complies with all applicable rules, regulations, resolutions and decisions for all customer classes, including but not limited to Decision (D.) 18-10-019, D.19-10-001 and D.20-02-047 (the 2020 “ERRA Forecast Decision”), and prevents illegal cost shifts between bundled and unbundled ratepayers.²

¹ See, Cal. Pub. Util. Code § 451.

² Cal. Pub. Util. Code §§ 366.2(f)(2), (g).

I. DESCRIPTION OF CALCCA

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, Baldwin Park Resident Owned Utility District, CleanPowerSF, Clean Energy Alliance, Clean Power Alliance, Desert Community Energy, East Bay Community Energy, Lancaster Choice Energy, MCE, Monterey Bay Community Power, Peninsula Clean Energy, Pioneer Community Energy, Pico Rivera Innovative Municipal Energy, Pomona Choice 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.

II. CALCCA'S INTEREST IN THIS 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. Customers of CalCCA's member CCAs pay the PCIA rate as departing load customers. CalCCA's interests center on whether SCE 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. For this reason, CalCCA intends to participate in the pending 2021 Forecast ERRA proceedings for all three of the major investor-owned utilities.

CalCCA members serving customers in the SCE service territory are also participating in this proceeding as “SoCal CCAs,” including Clean Power Alliance and CalChoice, a joint powers authority formed to assist and support a group of cities with CCA programs.³ CalCCA intends to coordinate with these CCAs to align interests and participation to the extent possible.

III. GROUNDS FOR PROTEST

CCA is still reviewing the Application and anticipates that it will propound discovery requests and otherwise seek to examine other aspects of the Application. As such, CalCCA reserves the right to identify and address other issues that may arise in this proceeding. However, CalCCA joins the SoCal CCAs in protesting the Joint Application to further record development on the following aspects of PCIA calculation: (1) calculation of the Indifference Amount, (2) calculation of the year-end PABA balance, or (3) ratemaking, i.e., allocating those costs among vintages and customer classes. In addition, the Commission will need to address the interaction between this docket and any PCIA Undercollection Balancing Account trigger application filed during the pendency of this proceeding.

IV. PROCEDURAL SCHEDULE, NEED FOR HEARINGS, AND CATEGORIZATION OF PROCEEDING

Pursuant to Rule 2.6(d), CalCCA provides the following procedural comments:

A. Need for Hearing

³ Currently the cities of Lancaster, Pico Rivera, Rancho Mirage, San Jacinto, and the Town of Apple Valley operate CCA programs in association with CalChoice. CalChoice is also providing support to the following cities, which are expected to implement CCA programs in 2020 or 2021: Baldwin Park, Palmdale, Pomona, and Santa Barbara. The City of Lancaster’s CCA program, Lancaster Choice Energy, began serving customers in May 2015, and was the first operational CCA within SCE’s service territory. CPA’s customers fall, and will fall, within the 2015, 2016, 2017 and 2020 vintages of customers that have departed from SCE’s service.

CalCCA believes that evidentiary hearings will be necessary on the issues identified in Section III.

B. Proposed Schedule

CalCCA supports the schedule proposed by the SoCal CCAs.

C. Categorization

The proceeding is appropriately categorized as “ratesetting.”

V. PARTY STATUS

Pursuant to Rule 1.4(a)(2), CalCCA hereby requests party status in this proceeding. As described herein, CalCCA has a material interest in the matters being addressed in this proceeding. CalCCA designates the following person as the “interested party” in this proceeding:

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VI. CONCLUSION

CalCCA appreciates the opportunity to submit this protest to the Application and requests party status.

Respectfully submitted,



Evelyn Kahl
General Counsel to the
California Community Choice Association

August 5, 2020