BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop an Electricity Integrated Resource Planning Framework and to Coordinate and Refine Long-Term Procurement Planning Requirements. Rulemaking 16-02-007 (Filed February 11, 2016)

CALIFORNIA COMMUNITY CHOICE ASSOCIATION’S COMMENTS ON THE PROPOSED DECISION GRANTING CALIFORNIA COMMUNITY CHOICE ASSOCIATION PETITION FOR MODIFICATION OF DECISION 19-11-016

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The California Community Choice Association (CalCCA) submits these comments pursuant to Rule 14.3 of the California Public Utilities Commission (Commission) Rules of Practice and Procedure on the August 24, 2020, proposed decision of ALJ Fitch, which Grants California Community Choice Association Petition For Modification Of Decision 19-11-016 (PD).

CalCCA supports the Commission’s adoption of the PD without change. CalCCA’s Petition for Modification requested modification of D.19-11-016 in two respects, as the PD notes:

1. To update the QC counting methodology for hybrid resources to the permanent methodology adopted subsequent to the PFM, in D.20-
06-031, Track 2 of the resource adequacy rulemaking (R.19-11-009).

2. To require, or at least permit, the costs of procurement by the IOUs on behalf of an LSE that opted-out of procuring capacity on behalf of its own customers, to be billed to the LSE directly, rather than to its customers through a nonbypassable surcharge.

The PD fully grants CalCCA’s request to apply the final hybrid qualifying capacity counting methodology, adopted in D.20-06-031, to determine compliance with D.19-11-016. While the PD does not require the Commission to adopt a methodology to directly bill load serving entities that default to procurement by the investor-owned utility, it modifies D.19-11-016 to make room for the debate now occurring in R.20-05-003.

CalCCA appreciates the Administrative Law Judge’s timely response to CalCCA’s petition and requests adoption of the PD without change.

Respectfully submitted,

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