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**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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September 14, 2020

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The California Community Choice Association (CalCCA)<sup>1</sup> 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:<sup>2</sup>

1. To update the QC counting methodology for hybrid resources to the permanent methodology adopted subsequent to the PFM, in D.20-

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<sup>1</sup> Apple Valley Choice Energy, Baldwin Park Resident Owned Utility District, CleanPowerSF, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, Desert Community Energy, East Bay Community Energy, Lancaster Choice Energy, Marin Clean Energy, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community 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.

<sup>2</sup> PD at 3.

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,



Evelyn Kahl  
General Counsel to the  
California Community Choice Association

September 14, 2020