



September 29, 2020

CPUC Energy Division
Attn: Tariff Unit and Edward Randolph, Director
505 Van Ness Avenue
San Francisco, CA 94102

By email: EDTariffUnit@cpuc.ca.gov

**Re CalCCA Protest to Southern California Edison's and San Diego Gas and Electric's
AMP Advice Letters in response to Decision 20-06-003**

Dear Tariff Unit and Mr. Randolph:

Pursuant to General Order 96-B, CalCCA¹ submits this protest to Southern California Edison Advice Letter 4287-E and San Diego Gas and Electric Advice Letter 3602-E / 2902-G (“Advice Letters”).

Southern California Edison (SCE) and San Diego Gas and Electric (SDG&E) filed their Advice Letters on September 9, 2020 in response to Decision (“D”) 20-06-003, Ordering Paragraph (“OP”) 83 and OP 87.

OP 83: To implement the arrearage management payment (AMP) plan, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company must each file a Tier 2 Advice Letter within 90 days of this decision to implement the AMP plan.

OP 87: The issue of concern raised by CalCCA as it relates to the allocation of proportional recovery shall be discussed in the AMP working group and a proposed resolution shall be set forth in the Tier 2 Advice Letters that Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company file.

¹ 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, Central Coast Community Energy, CleanPowerSF, Clean Energy Alliance, Clean Power Alliance, Desert Community Energy, East Bay Community Energy, Lancaster Choice Energy, MCE, 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.



While the Advice Letters adequately addresses the requirements established in D.20-06-003, certain provisions require further clarification.

1. The Advice Letters should clarify how often SCE and SDG&E plan to remit amounts recovered for generation-related arrears to the CCA.

CalCCA is supportive of SCE and SDG&E’s proposals to have all debt forgiven through the AMP, including third-party charges, tracked in the residential uncollectibles balancing account and then recovered through the public purpose programs charge.² Additionally, SCE states that it “will render amounts recovered for CCAs’ generation-related AMP subsidies to the CCA”³ but does not clarify how often (e.g., on a monthly basis or quarterly basis) the amounts recovered would be transmitted to the CCA. SCE’s Advice Letter should be re-filed to clarify this detail.

Furthermore, CalCCA is concerned that SDG&E does not make any statement that it plans to render amounts recovered for forgiven CCA arrears to CCAs in its Advice Letter. Thus, the Advice Letter should be re-filed to clarify SDG&E intends to render all amounts recovered for third-party charges that are forgiven to the third party to which they were owed, and clarify the frequency and process through which such amounts will be rendered. Specifically, SDG&E should clarify whether it plans to remit funds collected to recover debt-forgiveness costs to CCA programs using the same process and with the same frequency, i.e., daily, that it uses to process CCA program charges under SDG&E Rule 27. To the extent that the remittance process deviates from the process described in Rule 27, SDG&E should provide a detailed explanation regarding how its plan differs from that process.

2. SCE and SDG&E should be required to provide program information at the intervals requested by the CCAs, and SDG&E should clarify what information it will provide CCAs that notify it that they intend to participate in the AMP.

As described in the Advice Letters, SCE and SDG&E’s proposals for additional information to-be reported to CCAs about the AMP differ significantly. SCE correctly describes that CalCCA requested the following information to-be able to track the status of unbundled customer who are enrolled in the AMP:

1. AMP Eligibility / Ineligibility Flag (requested weekly)
2. AMP Enrollment Flag (requested weekly)
3. AMP Start / End Date (requested weekly)
4. Missed Payments Tracking (requested daily)
5. Total Expected AMP Dollar Amount (requested daily)
 - a. Total Expected Generation Dollar Amount

² SDG&E Advice Letter at pp. 6-7 and SCE Advice Letter at p. 12.

³ SCE Advice Letter at p. 12.



- b. Total Expected Distribution Dollar Amount
- 6. Processed AMP Dollar Amount (requested daily)
 - a. Processed Generation Dollar Amount
 - b. Processed Distribution Dollar Amount.⁴

Although CalCCA requested the information on a daily or weekly basis, CalCCA understands that both SCE and SDG&E will be implementing AMP through manual processes until SCE can automate the AMP in its customer service system and SDG&E completes deployment of its customer information system (“CIS”). SCE and SDG&E should clarify when they plan to automate the AMP program in their customer service systems, and provide the requested information at frequencies requested as much as possible.⁵ The information described above should be regularly provided to CCA programs on at least a weekly basis to provide timely information about AMP participation and avoid costly and time consuming account reconciliations that would be required if the data is provided on a less frequent basis.

Furthermore, SDG&E states that it “does not intend to deviate from any of the reports currently provided to its CCAs” and that it “will work with its current CCA, Solana Energy Alliance, to accommodate data requests prior to implementation of the new CIS system.”⁶ CalCCA find this troublesome because having to formally data request information for an ongoing program is not only slow and inefficient but also does not allow a CCA to have any visibility into which of its customers are eligible for or enrolled in the AMP because eligibility is determined based on both IOU and third-party arrears. Additionally, the dollar value of arrears that are expected to be forgiven, the value of forgiven amounts that have been processed, and whether a customer has made the monthly payment it was supposed to make and is still in good standing in the program must be communicated to the CCAs that participate in the program. It is essential for a CCA to have access to data about the arrearage amounts it is owed that will be forgiven in order to update its billing system logic and billing system reporting to coordinate the third-party billing side of an unbundled customer’s bill.

3. SCE should clarify whether a CCAs notice of intent to participate in the AMP is requested 45 days from the date of approval of the Advice Letters.

SCE states that it “requests that the CCAs notify SCE within 45 days of this AL submittal regarding their intent to participate” in the AMP.⁷ CalCCA requests that SCE modify the Advice Letter to state that it requests notification 45 days after the approval of the Advice Letter. CalCCA finds it unreasonable that CCAs are being asked to determine whether or not they will participate in the AMP without knowing exactly what the final Advice Letters that are approved by the Commission will state about the how the AMP will be implemented.

⁴ SCE Advice Letter at p. 13.

⁵ SCE Advice Letter at p. 13.

⁶ SDG&E Advice Letter at p. 7.

⁷ SCE Advice Letter at p. 13.



We thank the Commission for its consideration of this protest and urge the Commission to require SCE and SDG&E to re-file their Advice Letters to clarify the abovementioned issues.

Respectfully submitted,

Evelyn Kahl
General Counsel to the
California Community Choice Association

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