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

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

Application No. 20-07-004
(Consolidated)

Expedited Application of Southern
California Edison Company (U338E)
Regarding Power Charge Indifference
Adjustment Trigger.

Application No. 20-10-007
(Consolidated)

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S OPENING
COMMENTS ON SOUTHERN CALIFORNIA EDISON COMPANY'S
NOVEMBER UPDATE AND PCIA TRIGGER APPLICATION**

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November 16, 2020

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Pursuant to the schedule set forth in Commissioner Guzman-Aceves’s November 12, 2020 Amended Scoping Memo and Ruling, and Notice of Consolidation,¹ the California Community Choice Association (CalCCA)² hereby submit these Opening Comments on (1) the *Updated Testimony Energy Resource Recovery Account (ERRA) 2021 Forecast of Operations* regarding the *Application of Southern California Edison Company (SCE) (U 338-E) for Approval of Its Forecast 2021 ERRA Proceeding Revenue Requirement* and (2) the *Expedited Application of SCE (U338E) Regarding Power Charge Indifference Adjustment Trigger* (together, Applications).

CalCCA generally supports the opening comments of the Clean Power Alliance and California Choice Energy Authority (SoCal CCAs) on the Applications. CalCCA’s comments differ from the SoCal CCAs’ comments in one important respect due to the association’s broader

¹ A.20-07-004 and A.20-10-007, *Assigned Commissioner’s Amended Scoping Memo and Ruling, and Notice of Consolidation*, at 7 (September 10, 2020) (“Amended Scoping Ruling”).

² California Community Choice Association represents the interests of 24 community choice electricity providers in California: 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.

scope of concern, which encompasses pending ERRA forecast and trigger applications in the service territories of all three investor-owned utilities (IOUs).

Parties to this proceeding participated in a settlement conference on November 13, 2020,³ and developed a term sheet outlining a potential settlement. The SoCal CCAs conclude that “the terms of that potential settlement agreement will best achieve the key intent of the cap and trigger framework to avoid rate shock for unbundled customers while ensuring bundled customers are made whole in a timely manner.”⁴ CalCCA has participated in the settlement process and is making efforts toward full support. One element of the settlement, however, directly affects the positions of community choice aggregators in Pacific Gas and Electric Company and the San Diego Gas & Electric Company’s service territory Power Charge Indifference Adjustment trigger applications. Thus, CalCCA’s support for the potential settlement with SCE is conditioned on satisfactory resolution of the issue in the applications of the other IOUs.

For all the foregoing reasons, CalCCA respectfully requests consideration of these comments and looks forward to an ongoing dialogue with the Commission and stakeholders.

Respectfully submitted,



Evelyn Kahl
General Counsel to the
California Community Choice Association

November 16, 2020

³ A.20-10-007, *Southern California Edison Company's (U 338-E) Notice of Settlement Conference Pursuant To Rule 12.1* (November 4, 2020).

⁴ SoCal CCA Comments at 13-14 (*citing* D.18-10-019, pp. 15, 86-87, 155, 162 (explaining that the purpose of the cap and trigger mechanism is to provide “certainty and stability within a reasonable planning horizon,” to reduce “extreme PCIA price spikes and bill impacts,” and to ensure “reasonably predictable outcomes” for unbundled customers while providing a mechanism to correct for cost-shifting from unbundled to bundled customers.))