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

Order Instituting Rulemaking to Continue
Electric Integrated Resource Planning and
Related Procurement Processes.

R.20-05-003

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
REPLY COMMENTS ON THE PROPOSED DECISION ESTABLISHING PROCESS
FOR BACKSTOP PROCUREMENT REQUIRED BY DECISION 19-11-016**

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The California Community Choice Association (CalCCA)¹ submit these reply comments pursuant to Rule 14.3 of the California Public Utilities Commission (Commission) Rules of Practice and Procedure on the October 23, 2020 proposed *Decision Establishing Process for Backstop Procurement Required by Decision 19-11-016* (PD).

I. CLARIFY REQUIRED DOCUMENTATION FOR COMPLIANCE WITH MILESTONES AS DESCRIBED BY CLEANPOWERSF WITH SLIGHT MODIFICATION

In its Opening Comments, CleanPowerSF requests the PD be modified such that Load Serving Entities (LSE) with projects that have achieved commercial operation need only provide sufficient documentation to establish compliance with Milestone 3. CleanPowerSF also asserts that once compliance with Milestone 3 is confirmed, the LSE should not be required to make additional compliance demonstrations in future filings unless there has been a contractual change

¹ 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.

or change in resource status that would justify a formal update to the Commission. Similarly, the American Wind Energy Association (AWEA-CA) notes that the PD requires the submission of documents containing significant sensitive contractual information without clearly articulated benefit.

CalCCA agrees with these suggested revisions but adds that LSEs establishing compliance with only Milestone 3 still be required to provide a declaration affirming the possession of the underlying contract(s) for the resource(s). This would both demonstrate that the resources are online and that the individual LSEs have the resources under contract. In addition to relieving the administrative burden on both the Commission and LSEs for online resources by only requiring documentation germane to determining compliance, this change would be consistent with the fact that Decision 19-11-016 acknowledges both new build resources and existing resources as incremental to the extent the resources are not on the baseline list.

II. CONCLUSION

CalCCA appreciates the opportunity to submit these comments and requests adoption of the recommendations proposed herein. For all the foregoing reasons, the Commission should modify the PD to limit the scope of documentation required to demonstrate compliance with procurement milestones.

Respectfully submitted,



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California Community Choice Association

December 8, 2020