



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

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Order Instituting Rulemaking to Revise General Order 156 to Include Certain Electric Service Providers and Community Choice Aggregators and Encourage Voluntary Participation by Other Non-Utility Entities Pursuant to Senate Bill 255; Consider LGBT Business Enterprise Voluntary Target Procurement Percentage Goals; Incorporate Disabled Business Enterprises; Modify the Required Reports and Audits; and Update Other Related Matters.

R.21-03-010

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
REPLY COMMENTS ON STAFF PROPOSAL, WORKSHOP,
AND ADDITIONAL QUESTIONS**

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SUMMARY OF RECOMMENDATIONS

- ✓ The CCAs commit, to the extent possible and in compliance with the law, to continue to collaborate with one another, as well as Commission staff, to contribute to the success of the Supplier Diversity Program.
 - ✓ CalCCA Supports the Opening Comments filed by California Choice Energy Authority.
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**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
REPLY COMMENTS ON STAFF PROPOSAL, WORKSHOP,
AND ADDITIONAL QUESTIONS**

The California Community Choice Association¹ (CalCCA) submits these Reply Comments in response to the *Assigned Commissioner's Scoping Memo and Ruling (Scoping Memo)*, issued on June 25, 2021, the *Email Ruling Issuing Staff Proposal and Entering the Staff Proposal Into the Record* (Email Ruling), issued on July 16, 2021, *Staff Proposal to Revise General Order 156 for the Supplier Diversity Program* (Staff Proposal), issued on July 16, 2021, and the *Workshop on General Order 156 (Supplier Diversity Program)* (Workshop), held on July 21, 2021.

¹ California Community Choice Association represents the interests of 22 community choice electricity providers in California: Apple Valley Choice Energy, Baldwin Park Resident Owned Utility District, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, 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, City of San José, Administrator of San José Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

I. INTRODUCTION

CalCCA appreciates the opportunity to provide these Reply Comments. As reflected in CalCCA's opening comments on the Staff Proposal, Workshop, and Questions,² and in the individual meetings held on the Supplier Diversity Program (Program) with Commission staff by each Community Choice Aggregator (CCA), CalCCA's members are committed to working with the Commission and Commission staff to develop and implement the program, and to contribute to its success.

CalCCA's Opening Comments addressed the following: (1) the proposed revisions to GO 156 consistent with the limited requirements of Senate Bill (SB) 255 and the restrictions on CCAs with respect to procurement, including Proposition 209; (2) the recommendations for the expansion of diverse suppliers in the GO 156 Clearinghouse; and (3) a request to reject the recommendations in the Staff Proposal regarding expansion of the workforce and board diversity reporting requirements by CCAs.

CalCCA does not change its position on any of the topics that it raised in Opening Comments, but rather uses this opportunity to address the following additional issues:

- ✓ The CCAs commit, to the extent possible and in compliance with the law, to continue to collaborate with one another, as well as Commission staff, to contribute to the success of the Program.
- ✓ CalCCA Supports the Opening Comments filed by California Choice Energy Authority (CCEA).³

² *California Community Choice Association's Comments on Staff Proposal, Workshop, and Additional Questions*, August 4, 2021 (Opening Comments).

³ *Opening Comments of the California Choice Energy Authority on the Staff Proposal*, August 4, 2021 (CCEA Opening Comments).

II. CCAS WILL CONTINUE TO COLLABORATE WITH ONE ANOTHER AND WITH COMMISSION STAFF TO THE EXTENT POSSIBLE AND IN COMPLIANCE WITH THE LAW TO SHARE BEST PRACTICES AND ENCOURAGE SUPPLIER DIVERSITY

The CCAs have and will continue to work individually and through CalCCA to collaborate with Commission staff, and with one another (to the extent possible and in compliance with law), as to methods and best practices to support the important goals of the Program. As set forth in the CCA reports and plans, each CCA has and will continue to utilize the resources provided by the Commission, as well as their own committed resources, to encourage procurement of categories of suppliers in the Program in accordance with all applicable laws, and governing ordinances and policies. The CCAs welcome Commission staff support and commit to supporting the Program.

III. CALCCA SUPPORTS THE OPENING COMMENTS FILED BY CALIFORNIA CHOICE ENERGY AUTHORITY

CalCCA supports CCEA's Opening Comments. The business model of CCEA, as a Joint Powers Authority providing regulatory and support services to small cities operating CCAs, is one example of the varying size and composition of CalCCA's members.

IV. CONCLUSION

For all the foregoing reasons, CalCCA respectfully requests consideration of the comments provided herein.

Respectfully submitted,



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CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

August 18, 2021