



August 9, 2021

VIA ELECTRONIC MAIL

Mr. Ed Randolph
Director, Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: California Community Choice Association's Response to Southern California Edison Company's Tier 2 Advice Letter 4545-E Providing *Request for Waiver of Penalties for Failure to Meet September 2021 System Resource Adequacy Obligation as the Provider of Last Resort*

Dear Mr. Randolph:

Pursuant to the California Public Utilities Commission's (Commission's) General Order (GO) 96-B, Section 3.13, the California Community Choice Association (CalCCA) submits this response to Southern California Edison Company's (SCE's) Advice Letter 4545-E (Advice 4545-E), submitted on July 19, 2021.

CalCCA supports SCE's Request for Waiver as POLR

In Decision (D.) 20-06-031, the Commission granted the investor-owned utilities (IOUs), as Providers of Last Resort (POLRs), a waiver from system Resource Adequacy (RA) penalties where the cause of an RA shortfall is unexpected load return. Consistent with this decision, it would be unreasonable to penalize SCE for its inability to meet RA requirements for load involuntarily and suddenly returned to SCE by Western Community Energy (WCE).

CalCCA cannot determine whether the quantity of the waiver request is solely due to the returning WCE load as Advice 4545-E does not provide this information. CalCCA trusts that the Energy Division staff has sufficient information to evaluate the cause of the waiver and to determine whether it was solely due to the return of load in the role of POLR. Assuming the Energy Division staff comes to this conclusion, the requested waiver should be granted.

The Requested Waiver should be an input to SCE AL 4541-E

The requested waiver, its quantity, and the disposition of this Advice 4545-E should be considered in SCE's calculation of re-entry fees for WCE contained in SEC's Advice Letter 4541-E (Advice 4541-E). Within Advice 4541-E, SCE computes the forecast cost of RA based upon the RA requirement for the returning WCE load. However, if a waiver is granted, the calculation of such costs must be correspondingly adjusted. Failing to do so will result in WCE or its customers paying for a service that the customers did not receive. For this reason, the outcome of this Advice 4545-E should inform Advice 4541-E.

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CalCCA thanks the Energy Division for its review of this response and asks that the SCE waiver be approved for a quantity to be confirmed by Energy Division and that the outcome of this Advice 4545-E inform Advice 4541-E as appropriate.

Respectfully,

CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

Evelyn Kahl

A handwritten signature in blue ink that reads "Evelyn Kahl". The signature is written in a cursive style.

General Counsel and Director of Policy

cc via email:

Energy Division Tariff Unit (edtariffunit@cpuc.ca.gov)
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Service Lists for R.03-10-003 and R.19-11-009