



June 9, 2022

VIA ELECTRONIC MAIL

Mr. Simon Baker
Interim Director, Energy and Climate Policy
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: California Community Choice Association's Comments on Draft Resolution E-5216, Pacific Gas and Electric Company's, Southern California Edison Company's, and San Diego Gas & Electric Company's Renewables Portfolio Standard Voluntary Allocation Pro Forma Contracts

Dear Mr. Baker:

Pursuant to Rule 14.5 of the California Public Utilities Commission (Commission) Rules of Practice and Procedure, and the Comment Letter accompanying Draft Resolution 5216-E (Draft Resolution), the California Community Choice Association¹ (CalCCA) submits these comments on the Draft *Resolution E-5216. Pacific Gas and Electric Company's, Southern California Edison Company's, and San Diego Gas & Electric Company's Renewables Portfolio Standard Voluntary Allocation Pro Forma Contracts*, dated June 23, 2022 (Draft Resolution).

CalCCA thanks the Commission for its thoughtful consideration of the issues raised by CalCCA and others with respect to the Advice Letters proposing the Renewables Portfolio Standard (RPS) Voluntary Allocation pro forma contracts, as supplemented,² forming the basis of the Draft Resolution. Following meetings between CalCCA and the investor-owned utilities (IOUs), Pacific Gas and Electric Company (PG&E) and Southern California Edison Company (SCE) submitted supplemental Advice Letters to address many of the concerns CalCCA raised in its Protests to the original Advice Letters. Specifically, PG&E and SCE addressed: (1) allowing short-term allocations from the long-term resource pools, (2) inclusion of utility-owned

¹ California Community Choice Association represents the interests of 23 community choice electricity providers in California: Apple Valley Choice Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, East Bay Community Energy, Lancaster Choice Energy, Marin Clean Energy, Orange County Power Authority, 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, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

² PG&E Advice 6517-E (Feb. 28, 2022), supplemented by PG&E Advice 6517-E-A (Apr. 11, 2022); SCE Advice 4732-E (Feb. 28, 2022), supplemented by 4732-E-A (Mar. 18, 2022), supplemented by 4732-E-B (May 17, 2022); SDG&E Advice 3962-E (Feb. 21, 2022).

generation (UOG) and evergreen contracts in long-term voluntary allocations, and (3) adding contract language regarding notice and removal of resources from the allocation pools.³ CalCCA largely supports the Draft Resolution's conclusions and orders approving PG&E's and SCE's filings.

In addition, the Commission is requiring SDG&E to update its pro forma contract to address these three issues. CalCCA supports the requirement that SDG&E file a supplemental Advice Letter to modify its pro forma contract as set forth in the Draft Resolution.

CalCCA appreciates the Commission's encouragement of data sharing among IOUs and the load-serving entities (LSEs) receiving Voluntary Allocations to enhance CCA forecasting and operations. However, CalCCA is disappointed with the Draft Resolution's finding that providing preliminary forecast and meter data within 15 calendar days of the end of a Voluntary Allocation contract's Calculation Period "would be difficult, if not impossible, to provide." Certainly, providing timely access to preliminary data is *not impossible*, and critically, as discussed in CalCCA's Protests, access to such timely data is necessary to not disadvantage CCAs with regard to portfolio optimization. Simply encouraging the timely sharing of data is insufficient. The Commission should require the IOUs to provide preliminary, non-binding forecast and meter data within fifteen days of the end of the relevant delivery period.

Respectfully,

CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

Evelyn Kahl,



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Service List: R.17-06-026 and R.18-07-003

³ See *CalCCA Protest to PG&E Advice 6517-E* (Mar. 21, 2022); *CalCCA Protest of SCE Advice 4732-E* (Mar. 21, 2022); *CalCCA Protest of SDG&E Advice 3962-E* (Mar. 21, 2022).