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:


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


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. 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,

General Counsel and Director of Policy

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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).