

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



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Application of Pacific Gas and Electric
Company For Adoption of Electric Revenue
Requirements and Rates Associated with its
2023 Energy Resource Recovery Account
(ERRA) and Generation Non-Bypassable
Charges Forecast and Greenhouse Gas
Forecast Revenue Return and Reconciliation
(U 39 E)

Application No. 22-05-029
(Filed May 31, 2022)

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
PROTEST TO THE APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY**

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

Application of Pacific Gas and Electric Company For Adoption of Electric Revenue Requirements and Rates Associated with its 2023 Energy Resource Recovery Account (ERRA) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation (U 39 E)

Application No. 22-05-029
(Filed May 31, 2022)

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
PROTEST TO THE APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY**

Pursuant to Rule 2.6 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission” or “CPUC”), the California Community Choice Association¹ (“CalCCA”) hereby protests the relief sought in the above-captioned *Application of Pacific Gas and Electric Company (PG&E) for Adoption of Electric Revenue Requirements and Rates Associated with its 2023 Energy Resource Recovery Account (ERRA) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation* (“Application”).

In its Application, PG&E requests the Commission approve: (1) PG&E’s forecasted 2023 energy procurement revenue requirements to become effective in rates on January 1, 2023,

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 (“PCE”), 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 (“SJCE”), Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

including (a) disposition of PG&E’s forecast December 31, 2022 year-end balancing account balances; (b) disposition of recorded Voluntary Allocation Market Offer Memorandum Account (“VAMOMA”) balances; and (c) approval of PG&E’s methodology to include 2021 and 2022 renewable energy credits (“RECs”) towards the 2023 Power Charge Indifference Adjustment (“PCIA”) revenue requirement calculation and to allocate the value of 2021 and 2022 RECs to benefit bundled and departing load customers responsible for applicable Portfolio Allocation Balancing Account (“PABA”) vintage costs; (2) PG&E’s proposed forecasted electric sales for 2023; (3) PG&E’s forecast of greenhouse gas (“GHG”) revenues, revenue return, and administrative, programmatic and customer outreach costs for 2023; (4) PG&E’s 2021 GHG administrative and customer outreach costs as reasonable, and; (5) PG&E’s rate design proposals associated with its proposed total electric procurement revenue requirements to be effective in rates on January 1, 2023, including Green Tariff Shared Renewables (“GTSR”) rates.²

CalCCA protests the Application on the grounds that PG&E has not demonstrated the relief it requests is just and reasonable,³ is in compliance with all applicable rules, regulations, resolutions and decisions for all customer classes, including but not limited to Decision (“D.”) 18-10-019, D.19-10-001, and D.20-12-038, and prevents illegal cost shifts between bundled and unbundled ratepayers.⁴ PG&E, as the applicant, has the burden of affirmatively establishing that all aspects of the Application meet these standards.⁵ That burden of proof is generally measured

² Application at 2.

³ See Cal. Pub. Util. Code § 451.

⁴ Cal. Pub. Util. Code §§ 366.2(f)(2), (g).

⁵ D.12-12-030, p. 42.

based upon a preponderance of the evidence,⁶ and PG&E’s Application currently does not provide sufficient evidence to meet its burden.

The Application’s impact on both departed and bundled customers requires cautious and careful consideration. Although PG&E’s current proposal would decrease the PCIA for all customers, including the customers of the several community choice aggregators (“CCAs”) that CalCCA represents, as PG&E points out, the actual PCIA revenue requirement may change significantly over the course of this proceeding as PG&E updates its Application with actual data and revised forecasts.⁷ Parties and the Commission will not know the ultimate relief PG&E is requesting in this docket, including both the revenue requirements and the final rates proposed, until, at the earliest, PG&E updates its testimony in October (“Fall Update”).

Nonetheless, important work must be done prior to the Fall Update to investigate, clarify, and possibly modify and correct the following proposals, positions, calculations and issues in the Application:

- Whether PG&E’s proposal to include 2021 and 2022 RECs toward the 2023 PCIA revenue requirement calculation and to allocate the value of pre-2023 RECs to benefit customers responsible for the applicable PABA vintage is reasonable;
- Whether PG&E is correctly returning the final year of the PCIA Financing Subaccount (“ERRA-PFS”) credit to both bundled and unbundled customers, rather than bundled customers only, by amortizing that credit through the 2020 vintage subaccount of the PABA;
- Whether PG&E is correctly implementing D.19-11-016 and D.22-05-015 to ensure appropriate accounting treatment for both bundled and unbundled customers related

⁶ See, e.g., D.18-01-009, pp. 9-10; D.15-07-044, p. 29 (observing that the Commission has discretion to apply either the preponderance of evidence or clear and convincing standard in a ratesetting proceeding, but noting that the preponderance of evidence is the “default standard to be used unless a more stringent burden is specified by statute or the Courts.”).

⁷ Application at 3.

to the forecasted cost recovery of system reliability Modified Cost Allocation Mechanism (“CAM”) contracts;⁸

- Whether PG&E’s Indifference Calculation inputs and sources are appropriate and comply with D.18-10-019 and D.21-03-051;⁹
- Whether PG&E’s proposed accounting for Local RA resources forecasted to be shown or sold to the Central Procurement Entity in 2023 is reasonable and in compliance with prior Commission decisions;¹⁰
- Whether PG&E’s forecast of Retained RPS, Excess RPS, Sold RPS, and Unsold RPS energy is reasonable and in compliance with prior Commission decisions;¹¹ and
- Whether PG&E’s funding set asides for the Disadvantaged Community Green Tariff (“DAC-GT”) program and the Community Solar – Green Tariff (“CS-GT”) programs are consistent with the budgets requested by the particular CCAs.¹²

Beyond these substantive issues, Commission attention to procedural issues in this proceeding is also important. While D.22-01-023 in Rulemaking (“R.”) 17-06-026 sought to modestly extend the timeline of what is typically a truncated proceeding by requiring PG&E to file its Application by May 15,¹³ PG&E sought, and the Commission’s Executive Director granted an extension, to May 31. The resulting compressed nature of this proceeding, coupled with its contentious history, the enormous revenue requirements considered, and the deep complexity of the issues addressed, all support (1) the continuation of the procedural flexibility established in prior proceedings, (2) cooperation and shortened timelines in discovery for all parties, especially following rebuttal testimony and the Fall Update, (3) contemporaneous service of workpapers with any updates to testimony, (4) clear presentation of the changes between prepared and updated

⁸ See generally PG&E Testimony at Chapter 12.

⁹ See, e.g., *id.* at 11-26.

¹⁰ See generally *id.* at Chapter 8.

¹¹ See, e.g., *id.* at 11-11 – 11-21.

¹² See, e.g., *id.* at 20-12.

¹³ D.22-01-023, Ordering Paragraph (“OP”) 3.

testimony, and (5) a willingness from all parties to meet to discuss substantive issues. CalCCA will endeavor to work with PG&E on these procedural issues as much as possible but emphasizes that timely Commission intervention on procedural matters has been necessary in past ERRA forecast proceedings.

I. CALCCA'S INTEREST

CalCCA seeks to participate in this proceeding in order to protect the interests of the CCAs it represents and the interests of those CCAs' customers. As noted above, CalCCA represents the interests of 23 CCAs in California, including 11 CCAs that serve PG&E's delivery service customers. Except for SJCE and CleanPowerSF, each of those 11 CCAs is governed by a Board of Directors comprised of elected officials who represent the individual cities and counties the CCA serves, or an elected City Council. CleanPowerSF is the CCA for the City and County of San Francisco, which the San Francisco Public Utilities Commission operates. SJCE is the City of San José's CCA program, which the San José Community Energy Department administers. While CalCCA's advocacy frequently benefits both bundled and unbundled customers, the CCAs are the sole advocates for their customers and their local energy programs before this Commission.

CCA customers receive generation services from their local CCA and receive transmission, distribution, billing, and other services from PG&E. As such, CCA customers in PG&E's service territory must pay the same electric distribution, transmission and non-bypassable rates as PG&E's bundled customers. However, CCA customers pay CCA-specific generation rates, which vary and are partially influenced by local mandates to increase electric vehicle use, procure and maintain clean electricity portfolios that in many cases exceed state

requirements for renewable generation, and achieve other local goals.¹⁴ CCA and other unbundled customers are also subject to several non-bypassable charges, including the PCIA and CAM, the 2023 levels of which will be determined in this proceeding.

The CCAs represented by CalCCA are advocates for the customers in the local communities that formed them. Ensuring the accuracy of the PCIA and other charges CCA customers pay, planning for changes to the PCIA, and protecting customers from the rate shock that can result, is a core directive for all CCAs and essential for any load-serving entity (“LSE”). As a result of these factors, and those discussed above and below, CalCCA has a real, present, tangible and pecuniary interest in this proceeding.

II. GROUNDS FOR PROTEST

A. **PG&E Has Not Adequately Supported its New Proposed REC Tracking and Accounting Methodology, and the Commission Should Rule that the Consideration of that Methodology Beyond the 2023 RPS Compliance Year is Beyond the Scope of this Proceeding.**

PG&E forecasts that its bundled customer Retained RPS position will be lower than its RPS compliance target for 2023.¹⁵ PG&E explains that a REC shortfall in one year of an RPS compliance period can be satisfied by prior year excesses, provided those prior years fell within the same RPS compliance period.¹⁶ PG&E held excess RECs in years 2021 and 2022 and therefore proposes to apply those excess 2021 and 2022 RECs towards its 2023 compliance target because all three years fall within the 2021-2024 compliance period.¹⁷ In its testimony, PG&E proposes a new methodology to determine how many additional RECs generated before

¹⁴ For example, last year, PCE became the first load-serving entity in California to provide 100% greenhouse-gas free energy to each of its customers, well in advance of the State’s 2045 goal.

¹⁵ PG&E Testimony at 11-13.

¹⁶ *Id.* at 11-16.

¹⁷ *Id.*

2023 but within the 2021-2024 compliance period will be applied for bundled service customer compliance as a part of the 2023 PCIA revenue requirement calculation and how those RECs will be allocated across PCIA vintages within the 2021-2024 RPS compliance period.¹⁸ PG&E describes its new methodology as follows:

- (1) For a year in which there is a net shortfall and the remaining surplus RPS balance from the prior year(s) within the applicable RPS compliance period is greater than the ERRA year shortfall, an accounting adjustment will be made only to those years.
- (2) The adjustment will be weighted across the applicable RPS generation surplus years based on the remaining amount of surplus available for each year.¹⁹

Applying this methodology, PG&E's minimum retained RPS entry for 2023 will credit PCIA vintages 2021 and 2022 based on their weighted share of the cumulative excess across those years and debit ERRA for 4,932,817 MWh.²⁰ Table 11-5 in PG&E's testimony, copied below, illustrates the results of PG&E's forecasted entries.

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ *Id.* at 11-20.

**TABLE 11-5
2023 MINIMUM RETAINED RPS ENTRY**

Line No.	(A) Delivery Year	(B) Pre-2023 Adjusted Net RPS Position	(C) Minimum 2023 Entry	(D) = (B + C) Post-2023 Adjusted Net RPS Position
1	2021	5,267,672	(3,296,926)	1,907,746
2	2022	2,613,749	(1,635,891)	977,858
3	2023	(4,932,817)	4,932,817	0
4	Total	2,948,604	0	2,948,604

PG&E’s proposal to use excess 2021 and 2022 RECs to cover a potential shortfall in 2023, apply those RECs for bundled service customer compliance as a part of the 2023 PCIA revenue requirement calculation, and allocate those RECs across 2021 and 2022 PCIA vintages may very well be a reasonable solution to a near-term problem, to the extent that a REC shortfall in fact materializes in 2023. CalCCA notes, however, that PG&E’s near-term solution hinges on the assumption that all LSEs will take their full REC allocations through the new Voluntary Allocation Market Offer (“VAMO”) process described in Chapter 9 of PG&E’s testimony. While that outcome may materialize, it remains possible that LSEs may elect to take less than a full allocation through the VAMO process, or that PG&E will not experience any REC shortfall in 2023, rendering PG&E’s near-term solution unnecessary.

More importantly, CalCCA objects to PG&E’s suggestion that the Commission should adopt its proposal as a long-term tracking and accounting “framework”²¹ in this proceeding. While PG&E’s proposed REC tracking and accounting methodology may be a reasonable approach to address a REC shortfall in 2023, this ERRA Forecast proceeding is the wrong venue

²¹ PG&E asserts that its methodology “addresses the need for a tracking framework identified in D.20-02-047.” PG&E Testimony at 11-15, fn 28.

to consider a new long-term framework. As PG&E and the other utilities have reminded stakeholders time and again, the purpose of ERRA forecast dockets is to assure timely recovery of the utilities' actual electric procurement costs, as required by Public Utilities Code Section 454.5(d)(3), among other Commission decision-mandated tasks. The approval of program costs, the appropriate rate mechanisms to recover those costs, and the allocation of those costs among different customer groups is pre-determined via authorizing Commission decisions in other proceedings and the utility's general rate case. The scope of ERRA forecasting proceedings is limited to evaluating the IOUs' compliance with prior Commission orders, rules or policies.²²

The Commission has largely forbidden policymaking in ERRA Forecast cases unless a prior Commission decision has ordered such policymaking.²³ For example, the Scoping Memo in A.17-06-005 (PG&E's 2018 ERRA Forecast application) rejected the inclusion of certain CCA-proposed changes to the PCIA ratemaking methodology, stating:

The CCA parties are proposing changes to existing methods of calculation, and do not allege non-compliance with Commission rules, decisions, and resolutions on the part of PG&E. Such proposals should be addressed in proceedings with input from other investor-owned utilities and interested parties.²⁴

Fairness requires similar prohibitions be extended to consideration of PG&E's proposal as a long-term REC tracking and accounting framework. As the IOUs have argued previously, dockets like rulemakings and consolidated applications apply to all California utilities and are

²² See, e.g., A.13-05-015, *Scoping Memo and Ruling of Assigned Commissioner*, p. 4 (September 12, 2013).

²³ See, e.g., D.18-01-009 at 10 (finding that policy issues are properly addressed in other dockets); see also *id.* at 14, Conclusion of Law ("COL") 2 and Ordering Paragraph ("OP") 2 (denying PG&E's request to modify its line loss calculation).

²⁴ A.17-06-005, *Scoping Memo and Ruling of Assigned Commissioner*, pp. 3-4 (August 24, 2017).

noticed to, and generally include as parties, a broader set of stakeholders.²⁵ It is unlikely all parties with an interest in PG&E’s REC tracking and accounting framework have notice of it being raised here.

PG&E itself recently represented to the Commission how narrow and ministerial the scope of ERRA forecast applications has been—and how narrow it should be going forward. In R.17-06-026, the Commission sought input into a change in the schedule for the ERRA forecasts that would replace the November Update with an October Update.²⁶ CalCCA argued this change should be accompanied by a corresponding change to the filing date of the applications in order to largely maintain the same pre-Update timeline for parties to understand and develop a robust record.²⁷

PG&E disagreed, arguing ERRA Forecast proceedings do not include the type of policymaking that require substantial record development. “The existing schedule (*i.e.*, from June 1st to early November) is more than sufficient to litigate *what are mostly routine and non-controversial* non-Update-related aspects of the Joint Utilities’ ERRA Forecast proceedings.”²⁸ PG&E also stated it agreed with comments from another party that the ERRA Forecast proceedings “by design” should consist of “perfunctory updates” and observed that recent complications surrounding the November Update are likely indicative of “growing pains” associated with the

²⁵ See A.18-06-001, *PG&E Reply to Protests and Responses*, pp. 2-3 (July 16, 2018) (addressing rulemakings).

²⁶ R.17-06-026, *E-Mail Ruling Requesting Comments on ERRA Timing Proposal*, p. 5 (May 20, 2021).

²⁷ R.17-06-026, *California Community Choice Association’s Comments in Response To Staff’s ERRA Timing Proposal*, pp. 4-12 (June 15, 2021).

²⁸ R.17-06-026, *The Joint Utilities’ Opening Comments on Proposed Decision Resolving Phase 2 Issues Related To Energy Resources Recovery Account Proceedings*, p. 6 (January 6, 2022) (emphasis added).

new PCIA methodology and not indicative of what it called “*routine review* of the ERRA Forecast applications.”²⁹ PG&E also agreed that future ERRAs, including this 2023 ERRA Forecast, should “*be more routine* than have been experienced in the past two or three years.”³⁰ PG&E should not be allowed to push through approval of a brand new framework in a “routine” and expedited proceeding.

Importantly, there is simply no bandwidth to consider a new REC tracking and accounting framework in a 6.5-month proceeding. Stakeholders lack sufficient time and resources to track down all of the answers to the several thorny legal, policy and ratemaking questions that PG&E’s testimony leaves unanswered. For example:

- How did PG&E determine its RPS compliance position in 2023?
- How did PG&E determine the quantity of excess RECs in prior years (2021 and 2022)?
- What RPS benchmarks are used to value the 2021 and 2022 RECs?
- How does that compare to the price paid for those RECs in 2021 and 2022?
- How will PG&E address a REC shortfall in 2024?
- How would PG&E address a REC shortfall in 2024 if there are insufficient excess RECs from 2021 and 2022 to meet the compliance target?
- How would PG&E address a REC shortfall at the beginning of a new compliance period (*i.e.* 2025), when it would not have excess RECs from prior years within the RPS compliance period?

²⁹ R.17-06-026, *Reply of Southern California Edison Company (U 338-E) To Administrative Law Judge’s Ruling Requesting Comments on The Market Price Benchmark Issue Date*, p. 5 (September 22, 2021) (emphasis added).

³⁰ *Id.*

As the above questions make clear, CalCCA has endeavored since May 31 to try to find a way to try to evaluate the details of PG&E’s proposal in time for intervenor testimony, and will continue to do so; but the task is tall, and it is unlikely to be accomplished within the brief timeframes required for this proceeding.

For these reasons, CalCCA respectfully requests the Commission allow in this proceeding the evaluation of PG&E’s proposal to include excess 2021 and 2022 RECs toward the 2023 PCIA revenue requirement calculation and to allocate the value of pre-2023 RECs to benefit customers responsible for applicable PABA vintage costs, but rule that the adoption of PG&E’s REC tracking and accounting proposal as a framework applicable beyond the 2023 RPS compliance year is outside the scope of this proceeding.

B. PG&E Should Continue to Return the ERRA-PFS Credit to Bundled *and* Unbundled Customers by Amortizing the Final Year of that Credit Through PABA Consistent with D.22-02-002.

The ERRA-PFS is a subaccount within the ERRA that tracks revenue shortfalls associated with previously-capped PCIA rates for eligible departing load customers. The Commission previously approved PG&E’s proposal to amortize the ERRA-PFS balance (credit) from the 2020 PCIA revenue requirement over three years, effective 2021.³¹ PG&E will amortize the final year of ERRA-PFS credits in 2023.

In D.22-02-002, the Commission agreed with the Joint CCAs, who argued that all customers who were financially responsible for the ERRA-PFS balance—and not only bundled customers—should be entitled to the associated credit.³² Accordingly, the Commission directed PG&E to transfer the \$95 million ERRA-PFS credit for 2022 to the 2020 vintage PABA

³¹ D.20-12-038, COL 9, p. 37.

³² D.22-02-002, p.28.

subaccount.³³ The Commission stated: “By moving the ERRA-PFS to PABA, we promote indifference and accuracy by returning a balance to all customers who paid for it, and not only those who remain on bundled service.”³⁴

PG&E’s Application and testimony suggest that instead of amortizing the final year of the ERRA-PFS credit through PABA, consistent with D.22-02-002, PG&E may again be proposing to amortize that credit through ERRA.³⁵ If so, that credit would accrue to bundled customers only, which is neither reasonable nor consistent with the Commission’s decision on this very same issue in PG&E’s most recent ERRA Forecast case. CalCCA will further investigate PG&E’s treatment of the 2023 ERRA-PFS credit through discovery and address this issue in testimony and briefing if necessary.

C. PG&E Has Not Met Its Burden to Show the Relief Requested in its Application is Just and Reasonable and in Compliance with Commission Rules and Precedent.

CalCCA has identified numerous issues in PG&E’s Application that directly and substantially impact its interest described above. The specific issues enumerated below should be considered preliminary matters that CalCCA has identified as potentially unjust and unreasonable or out of compliance with Commission rules and precedent, and requiring further record development:

- Correct implementation of D.19-11-016 and D.22-05-015 to ensure appropriate accounting treatment for both bundled and unbundled customers related to the forecasted cost recovery of system reliability Modified CAM contracts;³⁶

³³ D.22-02-002, OP 5, p.54.

³⁴ D.22-02-002, p.28; *see also id.*, COL 7, p.51 (“Transferring the ERRA-PFS amount for 2022 to the 2020 PABA vintage subaccount promotes indifference to bundled customers and is just and reasonable.”)

³⁵ *See* PG&E Testimony at 17-3.

³⁶ *See generally id.* at Chapter 12.

- Whether PG&E’s Indifference Calculation inputs and sources are appropriate and comply with D.18-10-019 and D.21-03-051;³⁷
- Whether PG&E’s proposed accounting for Local RA resources forecasted to be shown or sold to the Central Procurement Entity in 2023 is reasonable and in compliance with prior Commission decisions;³⁸
- Whether PG&E’s forecast of Retained RPS, Excess RPS, Sold RPS, and Unsold RPS energy is reasonable and in compliance with prior Commission decisions;³⁹ and
- Whether PG&E’s funding set asides for the DAC-GT program and the CS-GT programs are consistent with the budgets requested by the particular CCAs.⁴⁰

CalCCA is still examining the Application and reserves the right to address and protest additional issues in the course of this proceeding as they arise through further review, analysis, discovery and investigation of all aspects of the Application.

III. CATEGORIZATION OF PROCEEDING, SCOPE OF ISSUES, NEED FOR HEARINGS AND PROPOSED PROCEDURAL SCHEDULE

CalCCA agrees with PG&E’s proposed classification of this proceeding as “ratesetting”.

While CalCCA will pursue settlement and record stipulations to the extent feasible, it is prudent to reserve a date for an evidentiary hearing to address unresolved issues of fact.

A. PG&E’s List of Issues is Incomplete and Should be Expanded.

PG&E offers the following issues to be considered in its Application:⁴¹

1. Should the Commission adopt PG&E’s request to approve 2023 ERRRA Forecast revenue requirements in this Application of \$1,952 million and revenue requirements of \$4,486 million for 2023 ratesetting purposes all as initially forecast herein and as may be updated through the course of this proceeding including (a) disposition of PG&E’s forecast December 31, 2022 year-end balancing account balances; (b) disposition of recorded VAMOMA balances; and

³⁷ See, e.g., *id.* at 11-26.

³⁸ See generally *id.* at Chapter 8.

³⁹ See, e.g., *id.* at 11-11 – 11-21.

⁴⁰ See, e.g., *id.* at 20-12.

⁴¹ Application at 29-30.

(c) the application of PG&E’s methodology to include 2021 and 2022 RECs toward the 2023 PCIA revenue requirement calculation and to allocate the value of pre-2023 RECs to benefit customers responsible for applicable PABA vintage costs?

2. Should the Commission adopt PG&E’s 2023 electric sales forecast?
3. Should the Commission adopt the following GHG-related forecasts for 2023?

	2023 GHG-Related Forecasts and Administrative, Program, and Outreach Expenses	Amount
1	GHG Administrative and Outreach Expenses	\$737,000
2	Customer Generation Programs	\$64.4 million
3	Net GHG Revenue Return	\$536.7 million
4	Semi-annual California Climate Credit	\$42.58

4. Were PG&E’s recorded 2021 administrative and outreach expenses of \$560,000 reasonable?
5. Should the Commission approve PG&E’s rate proposals associated with its proposed total electric procurement related revenue requirements, including its GTSR proposal, to be effective in rates on January 1, 2023?

Commissioner Guzman Aceves’s Scoping Ruling⁴² in last year’s PG&E ERRR Forecast proceeding included the following issues:

1. Whether PG&E’s requested 2022 ERRR Forecast revenue requirement, Cost Allocation Mechanism/New System Generation Charge (“CAM/NSGC”), PCIA, Ongoing Competition Transmission Charge (“CTC”), and Tree Mortality Non-Bypassable Charge are reasonable and should be adopted;
2. Whether the Commission should adopt PG&E’s 2022 electric sales forecast;
3. Whether the Commission should adopt PG&E’s GHG related forecast for 2021 of GHG allowance revenues and returns, including Administrative and Outreach Expenses, GHG administrative and outreach set-aside true-up, Customer

⁴² A.21-06-001, *Assigned Commissioner’s Scoping Memo and Ruling*, pp. 3-4 (August 11, 2021) (“2021 Scoping Ruling”).

Generation Program Expenses, Net GHG revenue return, and per household Semi-Annual Residential California Climate Credit;

4. Whether PG&E's recorded 2020 GHG administrative and outreach expenses of \$598,000 are reasonable;
5. Whether all calculations and entries, including but not limited to CAM/NSGC, PCIA, Ongoing CTC, ERRA, ERRA-PCIA Financing Subaccount, PCIA Under-Collection Balancing Account, Non-Vintage PCIA, TMNBC, Bioenergy Market Adjusting Tariff, and GHG related items, including the funding of GHG clean energy programs, are in compliance with all applicable rules, regulations, resolutions and decisions for all customer classes;
6. Whether the Commission should approve the rate proposal associated with PG&E's proposed electric procurement related revenue requirements, including its 2022 GTSR rate proposal;
7. Whether the Commission should approve PG&E's disposition of year-end 2021 ERRA balance, excluding deferred revenue resulting from capped vintage 2020 PCIA rates, to the 2021 vintage subaccount of the PABA;
8. Whether the Commission should approve PG&E's proposal to transfer certain public-policy procurement costs from its PABA non-vintaged subaccount to a new subaccount in the Public Policy Charge Balancing Account for recovery from all customers through the Public Purpose Program charge on a going forward basis;
9. Whether PG&E's proposal to transfer the year-end 2021 ERRA balancing account balance, less amounts associated with the ERRA-PFS, to the latest vintage of the PABA is reasonable;
10. Whether the Commission should allow PG&E to correct an error related to the 2021 Community Green Solar Tariff program set aside amount in D.20-12-038 in this proceeding;
11. Whether there are any safety considerations raised by this application; and
12. Whether the Application aligns with or impacts the achievement of any of the nine goals of the Commission's Environmental and Social Justice Action Plan.

CalCCA believes that the list of issues in Commissioner Guzman Aceves's 2021 Scoping Ruling presents a good starting place for the scope of issues to be considered in this case, modified to: (1) update certain dates and figures such as the expenses included in Issue 4 of the list from the Scoping Ruling; (2) remove certain issues that PG&E does not request in this Application and therefore are no longer relevant such as Issue 8 of the list from the Scoping Ruling; and (3) add

certain issues that PG&E requests in this Application but did not request in last year’s ERRA Forecast Application, such as the REC accounting issue described in Issue 1 within PG&E’s list of issues to be considered.

B. CalCCA supports PG&E’s Proposed Procedural Schedule.

CalCCA supports the procedural schedule described in PG&E’s Application, and included below for clarity.

Event	PG&E’s Proposed Schedule Supported by CalCCA
Application Filed	May 31, 2022
Notice of Application Appears in Daily Calendar	June 6, 2022
Protests	30 days from Notice
Reply filed	10 days from Protest
Prehearing Conference	By July 22, 2022
PAO/Intervenor testimony served	September 7, 2022
Rebuttal testimony served	September 21, 2022
Rule 13.9 Meet and Confer	September 24, 2022
Evidentiary Hearings	September 27, 2022
Opening Briefs	October 7, 2022
Reply Briefs	October 17, 2022
Update to Prepared Testimony (Fall Update) Served	October 24, 2022
Comments to Fall Update Served, proceeding submitted	November 10, 2022
Proposed Decision	November 2022
Comments on Proposed Decision	5 days after Proposed Decision
Reply Comments	3 days after comments on Proposed Decision
Final Decision	By December 15, 2022

C. Other Procedural Requests in Light of the Compressed Nature of This Proceeding.

In light of the compressed nature of this proceeding, CalCCA also requests that the Commission:

- Set the default discovery timelines for all parties to (a) five business days prior to the Fall Update, (b) three business days after rebuttal testimony, and (c) two business days after the Fall Update is filed, with exceptions from those timelines allowed in the event that PG&E requires more time due to the number or breadth of data requests;
- Require PG&E to serve public and confidential workpapers concurrently—or as close to concurrently, as possible—with all testimony supplements and updates over the course of the proceeding;
- Require from PG&E a clear presentation of modifications between its Prepared Testimony and any supplemental testimony; and
- Encourage PG&E to continue to meet with CalCCA after PG&E files the Fall Update.

IV. COMMUNICATIONS AND SERVICE

CalCCA consents to “email only” service and request that the following individuals be added to the service list for A.22-05-029 on behalf of CalCCA:

Party Representative

Nikhil Vijaykar
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580 California Street, 12th Floor
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Information-Only

Please include the CCA representative listed below on the information-only service list for this proceeding:

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V. CONCLUSION

For the foregoing reasons, CalCCA requests that the Commission set this matter for hearing to fully examine the issues discussed above.

Dated: July 6, 2022

Respectfully submitted,

/s/ Nikhil Vijaykar _____
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