

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



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Order Instituting Rulemaking to Establish a
Framework and Processes for Assessing the
Affordability of Utility Service.

R.18-07-006

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
REPLY COMMENTS ON THE PROPOSED DECISION
IMPLEMENTING THE AFFORDABILITY METRICS**

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July 8, 2022

SUMMARY OF RECOMMENDATIONS

- ✓ The California Public Utilities Commission should reject Pacific Gas and Electric Company's request to provide its affordability metrics calculation 15 business days after a rate application is filed.

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The California Community Choice Association (CalCCA)¹ submits these Reply Comments pursuant to Rule 14.3(d) of the California Public Utilities Commission (Commission) Rules of Practice and Procedure on the proposed *Decision Implementing the Affordability Metrics* (PD), issued on June 10, 2022, and *Email Ruling Granting Request for Extension of Time to File Reply Comments on Phase 2 Affordability Proposed Decision*, dated June 27, 2022.

As set forth in its Opening Comments, CalCCA supports the PD's establishment of a multi-year period of assessment on affordability metrics implementation.² CalCCA also supports the PD's reliance on the CalEnviroScreen tool to replace the Socioeconomic Vulnerability Index proposed in the Affordability Metrics Implementation Staff Proposal, dated November 5, 2021,³

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 PD at 62, Conclusion of Law (COL) 17.

³ See *Assigned Commissioner's and Assigned Administrative Law Judge's Ruling Inviting Comments on Staff Proposal on Implementation of Affordability Metrics, Attachment A*, R.18-07-006 (Nov. 5, 2021).

to ensure a wider lens of affordability is captured including both socioeconomic and environmental indicators.⁴

This Reply responds to one request made in Pacific Gas and Electric Company's (PG&E's) Opening Comments: to allow investor-owned utilities (IOUs) 15 business days after the IOU files an application requiring affordability metrics to submit such metrics to the Commission.⁵ For the reasons set forth below, the Commission should reject PG&E's proposal and adopt the PD's requirement to submit affordability metrics at the time of application filing.

I. THE COMMISSION SHOULD REJECT PG&E'S REQUEST TO PROVIDE ITS AFFORDABILITY METRICS CALCULATION 15 BUSINESS DAYS AFTER AN APPLICATION IS FILED

The Commission should reject PG&E's request for an additional 15 business days following an application to submit affordability metrics.⁶ PG&E cites "operational concerns" around implementing the affordability metric requirements while it is finalizing its proposal and revenue requirements supporting the underlying application.⁷

PG&E's proposed timeline fails to address the impact on intervenors and stakeholders responding to its rate setting application in compliance with Commission procedural rules. Intervenors and stakeholders typically have 30 days to submit protests and responses to rate setting applications submitted by IOUs.⁸ Submitting affordability metrics 15 business days after filing an application would result in stakeholders having only approximately five business days to review PG&E's affordability metrics analysis prior to drafting and filing a protest/response.

⁴ PD at 47-49, COL 13-14.

⁵ *Opening Comments of Pacific Gas and Electric Company (U 39 M) on the Proposed Decision Implementing the Affordability Metrics*, R.18-07-006 (June 30, 2022) (PG&E Opening Comments), at 2-4.

⁶ *See id.*

⁷ *Id.* at 2.

⁸ Commission Rules of Practice and Procedure, Rule 2.6(a).

This is an unreasonable and unfair timeline to sufficiently incorporate impacts to affordability into protests and responses, especially given the importance of utilizing these metrics to address affordability concerns for ratepayers.

Instead of the Commission providing additional time for IOUs to submit metrics after an application filing, the IOUs should incorporate the work necessary to complete affordability metrics requirements into their process and schedules for developing rate setting applications. Embedding the affordability metrics within the IOUs' process also advances affordability as a primary component to the application, rather than relegating the affordability analysis to an after-the-fact exercise.

II. CONCLUSION

For the reasons set forth above, PG&E's request for 15 additional business days to submit affordability metrics after submitting an application requiring such metrics should be rejected.

Respectfully submitted,



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CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

July 8, 2022