

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



FILED

09/30/22

04:59 PM

R2110002

Order Instituting Rulemaking to Oversee the
Resource Adequacy Program, Consider
Program Reforms and Refinements, and
Establish Forward Resource Adequacy
Procurement Obligations.

R.21-10-002

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
MOTION TO SHORTEN RESPONSE TIME TO CALIFORNIA COMMUNITY
CHOICE ASSOCIATION'S EMERGENCY PETITION FOR MODIFICATION OF D.22-
03-034 TO MODIFY RESOURCE ADEQUACY PROCUREMENT TIMELINE AND
ADOPT INTERIM SYSTEM RESOURCE ADEQUACY WAIVER PROCESS**

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September 30, 2022

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Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Reforms and Refinements, and Establish Forward Resource Adequacy Procurement Obligations.

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ADOPT INTERIM SYSTEM RESOURCE ADEQUACY WAIVER PROCESS**

Pursuant to Rule 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), the California Community Choice Association¹ (CalCCA) respectfully moves for a Ruling to shorten time for parties to respond to *California Community Choice Association’s Emergency Petition for Modification of D.22-03-034 to Modify Resource Adequacy Procurement Timeline and Adopt Interim System Resource Adequacy Waiver Process* (Petition), which CalCCA is filing concurrently with this motion on September 30, 2022, in the above-captioned proceeding.

CalCCA’s Petition requests action to modify Decision (D.) 22-03-034 to extend the compliance timeline for system resource adequacy (RA) compliance and to adopt an interim

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.

system RA penalty waiver process. Load-serving entities must make annual system RA compliance showings on October 31, 2022, and time is of the essence in resolving the issues presented by the Petition. Without near-term resolution, LSEs will remain uncertain on how to address any system RA requirement yet to be procured, leading to inefficient and unnecessarily costly procurement.

Rule 16.4(f) provides that responses to petitions for modification must be filed within 30 days of the date the petition was filed. Absent a shortening of time for responses, parties may not respond to the Petition until the compliance showing date, October 31, 2022.

For all the foregoing reasons, CalCCA respectfully requests that the Commission shorten the time to respond to CalCCA's Petition to seven (7) days, making responses due on October 7, 2022.

Respectfully submitted,



Evelyn Kahl,
General Counsel and Director of Policy
CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

September 30, 2022