

**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
2024 Energy Resource Recovery Account
(ERRA) and Generation Non-Bypassable
Charges Forecast and Greenhouse Gas
Forecast Revenue Return and Reconciliation
(U 39 E)

Application No. 23-05-012
(Filed May 15, 2023)

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

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**BEFORE THE PUBLIC UTILITIES COMMISSION
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Application of Pacific Gas and Electric Company For Adoption of Electric Revenue Requirements and Rates Associated with its 2024 Energy Resource Recovery Account (ERRA) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation (U 39 E)

Application No. 23-05-012
(Filed May 15, 2023)

**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, 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 2024 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 2024 energy procurement revenue requirements to become effective in rates on January 1, 2024, including (a) disposition of PG&E’s forecast December 31, 2023 year-end balancing account balances, subject to adjustments in the Annual Electric true-up process, except for disposition of balances recorded to the Modified Cost Allocation Mechanism Balancing Account (MCAMBA); (b)

¹ California Community Choice Association represents the interests of 24 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 (EBCE), Energy for Palmdale’s Independent Choice, Lancaster Choice Energy, Marin Clean Energy (MCE), 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.

disposition of recorded Voluntary Allocation Market Offer Memorandum Account (VAMOMA) balances; and (c) approval of PG&E’s methodology to include pre-2024 renewable energy credits (REC) towards the 2024 Power Charge Indifference Adjustment (PCIA) revenue requirement calculation and to allocate the value of such 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 2024;
3. PG&E’s forecast of greenhouse gas (GHG) revenues, revenue return, and administrative, programmatic and customer outreach costs for 2024;
4. PG&E’s 2022 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, 2024, 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, D.20-12-038, and D.23-06-066, 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 based upon a preponderance of the evidence⁶ 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

² Application at 1-2.

³ See, Cal. Pub. Util. Code § 451.

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

⁵ D.12-12-030 at 42.

⁶ See, e.g., D.18-01-009 at 9-10; D.15-07-044 at 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.”).

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 change the approved methodology for allocating Electric Supply Administration (ESA) costs, and allocate those costs based on gross generation authorized costs (as opposed to allocation on net authorized revenue requirements), is reasonable and in compliance with all applicable rules, regulations, resolutions and decisions;
- Whether PG&E’s proposal to include pre-2024 RECs—including RECs generated prior to the current (2021-2024) RPS compliance period—toward the 2023 PCIA revenue requirement calculation; its proposal to use a “last-in first-out” approach to meet REC deficits after applying 2021 and 2022 RECs towards its forecasted shortfall; its decision not to apply over 4 million MWh in Unsold RPS in 2023⁸ towards its forecasted shortfall; and its proposal to allocate the value of pre-2024 RECs to benefit customers responsible for the applicable PABA vintage is reasonable and in compliance with all applicable rules, regulations, resolutions and decisions;⁹
- Whether PG&E’s proposal to amortize any year-end 2023 residual balance in the PCIA Undercollection Balancing Account (PUBA) in 2024 rates (through PUBA rate adders)¹⁰ is reasonable;
- Whether PG&E is correctly calculating the reduction in its PCIA revenue requirement resulting from the removal of Diablo Canyon Power Plant (DCPP) Unit 1 from the PCIA (upon that Unit’s retirement on November 2, 2024);

⁷ Application at 2-3.

⁸ See PG&E Testimony at 9-22, Table 9-4.

⁹ See *id.* at 9-17 – 9-24.

¹⁰ See *id.* at 14-23.

- 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 to the forecasted cost recovery of system reliability Modified CAM contracts;¹¹
- Whether PG&E’s Indifference Calculation inputs and sources are appropriate and comply with D.18-10-019 and D.21-03-051;¹²
- Whether PG&E’s proposed accounting for Local RA resources forecasted to be shown or sold to the Central Procurement Entity in 2024 is reasonable and in compliance with prior Commission decisions;¹³
- 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;¹⁴ 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.¹⁵

Beyond these substantive issues, the Commission’s attention to procedural issues in this proceeding is also important. The 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 public and confidential workpapers with any updates to testimony, including PG&E’s supplemental testimony to be filed on August 15, 2023, (4) clear presentation of the changes between prepared and updated testimony, and (5) a willingness from all parties to meet to discuss substantive issues.

¹¹ See *id.* at 3-8 – 3-9.

¹² See, e.g., *id.* at 9-31.

¹³ See generally *id.* at Chapter 6.

¹⁴ See, e.g., *id.* at 9-15– 9-24.

¹⁵ See, e.g., *id.* at 17-12.

CalCCA will endeavor to work with PG&E on these procedural issues as much as possible but request the Commission provide direction on these issues as set forth in this protest.

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 24 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. CCA and other unbundled customers are also subject to several non-bypassable charges, including the PCIA and the Cost Allocation Mechanism (CAM), the 2024 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 Proposal to Change Its Methodology for Allocating Electric Supply Administration Costs.

Since the PABA was implemented in 2019, PG&E has allocated ESA costs to ERRA and PABA based on the net authorized revenue requirements (authorized generation resource costs less the market value of the supply portfolio) for each balancing account.¹⁶ PG&E now proposes to materially change that allocation methodology not only for the purposes of its 2024 ERRA Forecast but for all future ERRA Forecast proceedings.¹⁷ Going forward, PG&E proposes to allocate the recovery of ESA costs based only on the *authorized generation resource cost component* of the revenue requirement authorized by the Commission for each balancing account—in the process, eliminating the market value component to the allocation factor.¹⁸

PG&E’s testimony does not adequately explain or support its proposal to change its ESA cost allocation methodology. First, PG&E does not explain whether it has previously allocated ESA costs to ERRA, PCIA and NSGBA consistent with its approved allocation methodology; and if not, whether it now proposes to retroactively adjust allocations for prior years. Second, PG&E

¹⁶ *Id.* at 9-10.

¹⁷ *Id.* at 9-11.

¹⁸ *Id.*

does not explain whether or how its proposed allocation methodology would reflect the removal of DCP Unit 1 from the PCIA effective November 2, 2024, or the removal of DCP Unit 2 in 2025. PG&E's description of its proposed ESA cost allocation methodology is notably silent on the allocation of ESA costs to the Diablo Canyon Extended Operations Balancing Account (DCEOBA)—the balancing account PG&E has established to track the costs of DCP extended operations—once Units 1 and 2 are removed from the PCIA (on November 2, 2024, and August 26, 2025 respectively). To the extent that PG&E's proposed methodology *does not* appropriately allocate ESA costs to Diablo Canyon, those costs may be over-allocated to the PCIA revenue requirement, which would directly and adversely impact CCA customers and CalCCA's interest.

CalCCA has investigated PG&E's proposal through discovery since the Application was filed, including its impact on the ERRA, PCIA and NSGBA revenue requirements, and will continue to do so over the course of this proceeding. CalCCA may present testimony and legal briefing on PG&E's proposal to ensure it is reasonable and in compliance with prior applicable Commission decisions and may recommend modifications to ensure PG&E appropriately allocates ESA costs to the DCEOBA once each Unit of DCP is removed from the PCIA.

B. PG&E Has Not Adequately Supported its Proposed REC Application and Allocation Methodology.

In its 2023 ERRA Forecast Proceeding, A.22-05-029, PG&E forecasted that its bundled customer Retained RPS position would be lower than its RPS compliance target for 2023.¹⁹ To remedy this forecast shortfall, PG&E proposed to apply excess RECs from years 2021 and 2022 towards its 2023 compliance target because all three years fall within the 2021-2024 RPS compliance period.²⁰ PG&E proposed a new methodology to determine the number of additional

¹⁹ *Id.* at 9-18; *see also* A.22-05-029, PG&E Testimony at 11-13.

²⁰ PG&E Testimony at 9-20.

RECs generated before 2023 but within the 2021-2024 compliance period that would be applied for bundled service customer compliance as a part of the 2023 PCIA revenue requirement calculation and how those RECs would be allocated across PCIA vintages within the 2021-2024 RPS compliance period.²¹ PG&E described its 2023 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.²²

No party to PG&E’s 2023 ERRA Forecast proceeding disputed PG&E’s proposal to apply 2021 and 2022 RECs to meet its obligations for the 2023 compliance year. All parties to that proceeding, however, agreed that PG&E’s proposal would only be a temporary solution for 2023, and that a more permanent solution—including a REC tracking framework—should be developed in a separate proceeding.²³

In this proceeding, PG&E again forecasts that, as a result of the voluntary allocation and market offer (VAMO) process, its bundled customer Net Physical RPS position will be less than its RPS compliance target for 2024.²⁴ To address this shortfall, PG&E states that it proposes an “extension of the minimum retained RPS methodology implemented and approved by the

²¹ *Id.*

²² *Id.*

²³ D.22-12-044 at 20, 22 (observing CalCCA and PG&E’s agreement that there should be a framework for handling banked renewable energy credits for the post-2023 period, and that the post-2023 period was beyond the scope of the 2023 ERRA Forecast proceeding).

²⁴ PG&E Testimony at 9-17.

Commission for 2023.” PG&E’s proposal, however, cannot properly be described as an “extension” of its 2023 methodology. That is because PG&E’s proposal deviates in at least two material ways from the methodology it proposed in its 2023 ERRA Forecast case. First, PG&E proposes to not only apply excess RECs from the current RPS compliance period (2021-2024) towards its forecast 2024 shortfall, but also to apply surplus RECs from years prior to 2021 towards its deficit—in other words, to reach back further than the current RPS compliance period.²⁵ This contrasts with Step 1 of PG&E’s 2023 methodology, which limited the application of prior year RECs to years within the current RPS compliance period. Second, PG&E proposes to use a “last-in first-out” approach to meet its residual deficit after applying 2021 and 2022 RECs (i.e., after applying 2021 and 2022 RECs, applying 2020 and then 2018 RECs towards the residual 2024 shortfall, in that order).²⁶ This contrasts with Step 2 of PG&E’s 2023 methodology, which weighted the application of RECs from prior surplus years (in that case, just 2021 and 2022) based on the amount of surplus available for each year. Table 9-6 from PG&E’s testimony,²⁷ reproduced below, depicts PG&E’s illustration of the impacts of its proposed 2024 methodology on its Minimum Retained RPS Entry.

²⁵ *Id.* at 9-21.

²⁶ *Id.*

²⁷ *Id.* at 9-24, Table 9-6.

**TABLE 9-6
2024 MINIMUM RETAINED RPS ENTRY**

Line No.	(A) Delivery Year	(B) Pre-2024 Adjusted Net RPS Position	(C) Minimum 2024 Entry	(D) = (B + C) Post-2024 Adjusted Net RPS Position
1	2018	4,773,405	(3,598,835)	1,174,570
2	2019	–	–	–
3	2020	445,318	(445,318)	–
4	2021	919,258	(919,258)	–
5	2022	452,598	(452,598)	–
6	2023	–	–	–
7	2024	(5,416,009)	5,416,009	–
8	Total	1,174,570	–	1,174,570

PG&E has not adequately supported its proposed 2024 methodology. PG&E’s proposal leaves several important legal, policy and factual questions unanswered, including:

- How did PG&E determine its RPS compliance position in 2024?
- How did PG&E determine the quantity of excess RECs in prior years (2018, 2020, 2021 and 2022)?
- What RPS benchmarks are used to value the prior year RECs?
- How do those benchmarks compare to the price paid for those RECs in the years in which they were generated?
- Why does PG&E not propose to apply over 4 million MWh of unsold RPS generation in 2023²⁸ towards its forecast 2024 REC shortfall?
- Do the RPS rules allow PG&E to apply RECs generated outside the current RPS compliance period towards its 2024 Net Physical RPS position?
- Is it reasonable to use a “last-in first-out” approach to apply available RECs from prior compliance periods, or would an alternative approach be more reasonable?

²⁸ See *id.* at 9-22, Table 9-4.

- Is PG&E’s proposed accounting for prior-year RECs reasonable?

As the above questions demonstrate, CalCCA has initiated its efforts to evaluate the details of PG&E’s 2024 proposal since the Application was filed on May 15, and will continue to do so over the course of this proceeding to ensure PG&E’s proposal is reasonable and in compliance with all applicable rules, regulations, resolutions and decisions. CalCCA may address the merits of PG&E’s proposal—including modifications to that proposal as necessary—in testimony and briefing.

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.

Beyond the issues described above, CalCCA has identified numerous issues in PG&E’s Application that directly and substantially impact its interests. 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:

- Whether PG&E’s proposal to amortize any year-end 2023 residual balance in the PUBA in 2024 rates (through PUBA rate adders)²⁹ is reasonable;
- Whether PG&E is correctly calculating the reduction in its PCIA revenue requirement resulting from the removal of DCPP Unit 1 from the PCIA (upon that Unit’s retirement on November 2, 2024);
- Whether PG&E’s Indifference Calculation inputs and sources are appropriate and comply with D.18-10-019 and D.21-03-051;³⁰
- Whether PG&E’s proposed accounting for Local RA resources forecasted to be shown or sold to the Central Procurement Entity in 2024 is reasonable and in compliance with prior Commission decisions;³¹

²⁹ See *id.* at 14-23.

³⁰ See, e.g., *id.* at 9-31.

³¹ See generally *id.* at Chapter 6.

- 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 to the forecasted cost recovery of system reliability Modified CAM contracts;³²
- 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;³³ 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.³⁴

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:³⁵

1. Should the Commission adopt PG&E’s request to approve 2024 ERRRA Forecast revenue requirements in this Application of \$1,796 million and revenue requirements of \$4,147 million for 2024 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, 2023 year-end balancing account balances, subject to adjustment for recorded balances through the AET process, except for balances recorded to the MCAMBA; (b) disposition of recorded VAMOMA balances; and (c) the application of PG&E’s methodology to include RECs generated prior to 2024 toward the 2024 PCIA revenue

³² See *id.* at 3-8 – 3-9.

³³ See, e.g., *id.* at 9-15– 9-24

³⁴ See, e.g., *id.* at 17-12.

³⁵ Application at 29-30.

requirement calculation and to allocate the value of pre-2024 RECs to benefit customers responsible for applicable PABA vintage costs?

2. Should the Commission adopt PG&E’s 2024 electric sales forecast?
3. Should the Commission adopt the following GHG-related forecasts for 2024?

	2024 GHG-Related Forecasts and Administrative, Program, and Outreach Expenses	Amount
1	GHG Administrative and Outreach Expenses	\$856,000
2	Customer Generation Programs	\$33.2 million
3	Net GHG Revenue Return	\$529.8 million
4	Semi-annual California Climate Credit	\$41.17

4. Were PG&E’s recorded 2021 administrative and outreach expenses of \$717,000 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, 2024?

Commissioner Guzman Aceves’s Scoping Ruling³⁶ in the 2022 PG&E ERRA Forecast

proceeding included the following more comprehensive set of issues:

1. Whether PG&E’s requested 2022 ERRA Forecast revenue requirement, Cost Allocation Mechanism/New System Generation Charge (CAM/NSGC), Power Charge Indifference Adjustment (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 Greenhouse Gas (GHG) related forecast for 2021 of GHG allowance revenues and returns, including Administrative and Outreach Expenses, GHG administrative and outreach set-aside

³⁶ A.21-06-001, *Assigned Commissioner’s Scoping Memo and Ruling* at 3-4 (Aug. 11, 2021) (2021 Scoping Ruling).

true-up, Customer 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 Cost Allocation Mechanism/New System Generation Charge, Power Charge Indifference Adjustment (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 Green Tariff Shared Renewables (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 Portfolio Allocation Balancing Account (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 (PPCBA) for recovery from all customers through the Public Purpose Program (PPP) 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 Decision 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 its 2022 ERRR Forecast Application, such as the REC application and allocation 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, but notes the Commission’s recent decision (D.23-06-006) in R.17-06-026 requires that PG&E meet certain additional deadlines in this proceeding. For clarity, CalCCA includes those deadlines (in **bold**) in PG&E’s schedule, below.

Event	PG&E’s Proposed Schedule Supported by CalCCA
Application Filed	May 15, 2023
Notice of Application Appears in Daily Calendar	May 17, 2023
Protests	30 days from Notice
Reply filed	10 days from Protest
Prehearing Conference	By July 6, 2023
PG&E to serve supplemental testimony providing Energy Index Market Price Benchmark weighting factors and underlying data	By August 15, 2023³⁷
PG&E to update 2024 ERRR Forecast workpapers to reflect whether it elects to provide an interim allocation of large hydroelectric energy	By September 6, 2023³⁸

³⁷ D.23-06-066 at 49, OP 6.

³⁸ *Id.* at 48, OP 3.

Event	PG&E's Proposed Schedule Supported by CalCCA
PAO/Intervenor testimony served	September 6, 2023
Rebuttal testimony served	September 27, 2023
Rule 13.9 Meet and Confer	October 2, 2023
Evidentiary Hearings	October 6, 2023
Opening Briefs	October 13, 2023
Reply Briefs	October 23, 2023
Update to Prepared Testimony (Fall Update) Served	October 16, 2023
Comments to Fall Update Served, proceeding submitted	November 1, 2023
Proposed Decision	November 2023
Comments on Proposed Decision	5 days after Proposed Decision
Reply Comments	3 days after comments on Proposed Decision
Final Decision	By December 14, 2023

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 with all supplements and updates to testimony;
- Require from PG&E a clear presentation of modifications between its Prepared Testimony and any supplemental testimony;
- Encourage PG&E to continue to meet with CalCCA after PG&E files the Fall Update; and
- Require PG&E to serve public and confidential workpapers contemporaneously with all testimony supplements and updates over the course of the proceeding.

The last request in the list above is particularly important. As CalCCA explained above,

per the requirements of D.23-06-066,³⁹ PG&E will file supplemental testimony on August 15 providing Energy Index Market Price Benchmark weighting factors and underlying data. To the extent the Commission adopts PG&E’s proposed procedural schedule (which CalCCA supports), intervenor testimony will be due just over three weeks after PG&E files supplemental testimony. In order for CalCCA and other parties to have a meaningful opportunity to evaluate PG&E’s testimony, issue discovery, and respond in their testimony as necessary, PG&E’s contemporaneous service of supplemental testimony and workpapers (public and confidential) is critical.

IV. COMMUNICATIONS AND SERVICE

CalCCA consents to “email only” service and request that the following individuals be added to the service list for A.23-05-012 on behalf of CalCCA:

Party Representative

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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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³⁹ *Id.* at 49, OP 6.

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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: June 16, 2023

Respectfully submitted,



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