



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

**FILED**

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Application of SAN DIEGO GAS &  
ELECTRIC COMPANY (U 902-E) for  
Approval of its 2024 Electric Procurement  
Revenue Requirement Forecasts, 2024  
Electric Sales Forecast, and GHG-Related  
Forecasts.

Application 23-05-013

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S  
MOTION FOR PARTY STATUS**

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September 5, 2023

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**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S  
MOTION FOR PARTY STATUS**

Pursuant to Rules 11.1 and 1.4(a)(4)<sup>1</sup> of the California Public Utilities Commission (Commission) Rules of Practice and Procedure, the California Community Choice Association (CalCCA) respectfully moves for party status in this proceeding.

**I. DESCRIPTION OF CALIFORNIA COMMUNITY CHOICE ASSOCIATION**

CalCCA represents the interests of California's community choice electricity providers<sup>2</sup> in the legislature and at state regulatory agencies, including the Commission. Its voting membership is comprised of operating community choice aggregation (CCA) programs in California that are serving load or those that are about to launch. CalCCA's mission is to create a legislative and regulatory environment that supports the development and long-term sustainability of locally run

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<sup>1</sup> *State of California, California Public Utilities Commission Rules of Practice and Procedure, California Code of Regulations, Title 20, Division, Chapter II, May 2021.*

<sup>2</sup> 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, Energy For Palmdale's Independent Choice, Lancaster 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.

CCAs in California. CalCCA serves its members and strengthens CCAs' collective voice through education, technical guidance, and regulatory and legislative advocacy.

## **II. STATEMENT OF INTERESTS PERTINENT TO THE ISSUES PRESENTED**

CalCCA's interests in this proceeding are tied to the interests of its CCA members and their customers and ensuring consistency in the application of Power Charge Indifference Adjustment (PCIA) decisions across investor-owned utility Energy Resources Recovery Account (ERRA) forecast proceedings. The impact of San Diego Gas & Electric Company's (SDG&E) application on both departed and bundled customers requires cautious and careful consideration under the applicable standards of proof.

CCA customers receive generation services from CCAs while receiving transmission, distribution, billing, and other services from SDG&E. CCA customers therefore pay generation rates associated with their own CCA's procurement. At the same time (and on the same bill), their customers pay the same electric distribution, transmission, and non-bypassable rates as SDG&E's bundled customers. Two of the non-bypassable charges which CCA customers pay are the PCIA and the Cost Allocation Mechanism, the 2024 levels of which will be determined in this proceeding.

PCIA rates are set in SDG&E's ERRA forecast proceedings based on the difference between the forecasted cost of SDG&E's generation in the target year and the forecasted market value. Ensuring the accuracy of the PCIA and other charges CCA customers pay, planning for changes to the PCIA, and protecting customers from any rate shock that could potentially result, are core considerations for all CCAs and essential for any load-serving entity (LSE). CalCCA represents its

member CCAs in the PCIA proceeding (Rulemaking (R.) 17-06-026)<sup>3</sup> and seeks to ensure electric utilities implement the rules and directives of Decision (D.) 22-01-023.<sup>4</sup>

Because CalCCA represents its member CCAs' interests, CalCCA has a direct interest in ensuring that rates charged to CCA customers are just and reasonable and properly calculated. Any unreasonable charges to CCA customers that could be approved through the various riders and adjustments that will be forecast in this proceeding, could have a significant negative competitive impact on CalCCA's members.

CalCCA intends to coordinate its efforts with San Diego Clean Power and Clean Energy Alliance to avoid duplication. This coordination will support efficient and timely resolution of the matters identified below.

### **III. STATEMENT OF FACTUAL AND LEGAL CONTENTIONS**

CalCCA intends to make the following factual and legal contentions, among others, as necessary, over the course of its involvement in this proceeding:

- Whether the Renewable Portfolio Standard allocations to LSEs under the Voluntary Allocation and Market Offer (VAMO) are accurate and consistent with applicable Commission decisions;<sup>5</sup>
- Whether SDG&E is accounting for its Renewable Portfolio Standard (RPS) is just and reasonable, including how SDG&E is accounting for RPS products not allocated through VAMO and the effect of VAMO on SDG&E's retained RPS;<sup>6</sup>
- Whether SDG&E's proposed accounting for modified cost adjustment mechanism procurement costs and benefits complies with D.22-05-015<sup>7</sup> and is just and reasonable;<sup>8</sup>

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<sup>3</sup> R.17-06-026, *Order Instituting Rulemaking to Review, Revise, and Consider Alternatives to the Power Charge Indifference Adjustment*, June 29, 2017.

<sup>4</sup> D.22-01-023, *Decision Resolving Phase 2 Issues Related to Energy Resources Recovery Account Proceedings*, R.17-06-026 (Jan. 27, 2022).

<sup>5</sup> *Prepared Direct Testimony of Sheri Miller on Behalf of San Diego Gas & Electric Company*, A.23-05-XXX (May 15, 2023), at SM-5 to SM-6.

<sup>6</sup> *Id.*

<sup>7</sup> D.22-02-015, *Decision on Modified Cost Allocation Mechanism for Opt-Out and Backstop Procurement Obligations*, R.20-05-003 (May 19 2022).

<sup>8</sup> *Prepared Direct Testimony of Rachelle R. Baez on Behalf of San Diego Gas & Electric Company*, A.23-05-XXX (May 15, 2023), at RRB-26 to RRB-28.

- Whether SDG&E’s proposed process for alternative sales forecasts by other parties is just and reasonable and consistent with prior Commission decisions;<sup>9</sup> and
- Whether SDG&E’s proposal to not include Investment Tax Credits resulting from the Inflation Reduction Act in 2023 year-end balancing account forecasts is just and reasonable.<sup>10</sup>

As such, and because CalCCA accepts the record of this proceeding without exception, CalCCA’s participation will not broaden the scope of or cause undue delay to this proceeding.

#### IV. NOTICE

CalCCA requests that all correspondence, pleadings, notices, orders, rulings, and other communications concerning this proceeding be emailed to the following party representative:

Willie Calvin, Regulatory Case Manager  
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#### V. CONCLUSION

For the reasons stated above, CalCCA respectfully requests that the Commission grant CalCCA’s motion for party status in this proceeding.

Respectfully submitted,



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

September 5, 2023

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<sup>9</sup> *Prepared Direct Testimony of Kenneth E. Schiermeyer on Behalf of San Diego Gas & Electric Company, A.23-05-XXX (May 15, 2023) at KES-9 to KES-10.*

<sup>10</sup> *Prepared Direct Testimony of Brenda Hua on Behalf of San Diego Gas & Electric Company, A.23-05-XXX (May 15, 2023), at BH-5 to BH-6.*