



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

FILED

04/05/24

04:59 PM

R2401018

Order Instituting Rulemaking to Establish
Energization Timelines.

R.24-01-018

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

Evelyn Kahl,
General Counsel and Director of Policy
Leanne Bober
Senior Counsel
CALIFORNIA COMMUNITY CHOICE
ASSOCIATION
One Concord Center
2300 Clayton Road, Suite 1150
Concord, CA 94520
Telephone: (510) 980-9459
E-mail: regulatory@cal-cca.org

April 5, 2024

TABLE OF CONTENTS

I.	DESCRIPTION OF CALIFORNIA COMMUNITY CHOICE ASSOCIATION	1
II.	STATEMENT OF INTERESTS PERTINENT TO THE ISSUES PRESENTED	2
III.	STATEMENT OF FACTUAL AND LEGAL CONTENTIONS	2
IV.	NOTICE	3
V.	CONCLUSION.....	4

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

Order Instituting Rulemaking to Establish
Energization Timelines.

R.24-01-018

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

Pursuant to Rules 11.1 and 1.4(a)(4)¹ 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 providers² 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 CCAs in California. CalCCA serves its members and strengthens CCAs' collective voice through education, technical guidance, and regulatory and legislative advocacy.

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

² California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert 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.

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. The Commission's Order Instituting Rulemaking (OIR)³ and Scoping Memo and Ruling⁴ (Scoping Memo) set forth the framework for the proceeding, including implementation of certain provisions of Senate Bill (SB) 410⁵ and Assembly Bill (AB) 50⁶ requiring the Commission to establish reasonable average and maximum target energization time periods. The Commission is also tasked with establishing procedures for customers to report energization delays to the Commission, among other requirements.

CCAs provide electric generation services and other services to customers. Distribution services are provided by the investor-owned utilities (IOU), who are also responsible for interconnecting and energizing CCA customers. Many of CalCCA's members are working to accelerate building and transportation electrification in their communities to reduce dependence on fossil fuels. The CCAs therefore have significant interest in ensuring their customers can receive timely energization to achieve these goals. CCAs consistently hear from their customers of significant energization delays and difficulties with the energization process. CalCCA will contribute the perspective of all its CCA members to this proceeding, providing information regarding the factors contributing to the delays, as well as potential solutions. As such, CalCCA has a direct, substantial, and unique interest in this proceeding.

III. STATEMENT OF FACTUAL AND LEGAL CONTENTIONS

CalCCA intends to contribute to this proceeding the position of its CCA members regarding the design and implementation of rules, timelines, IOU reporting obligations, customer

³ R.24-01-018, *Order Instituting Rulemaking to Establish Energization Timelines* (Jan. 25, 2024).

⁴ R.24-01-018, *Assigned Commissioner's Scoping Memo and Ruling* (Mar. 28, 2024).

⁵ SB 410, Stats. 2023, Ch. 294.

⁶ AB 50, Stats. 2023, Ch. 317.

service requirements, procedures for customer reports of energization delays, and potential impacts of the delays and proposed timelines and reporting processes on environmental and social justice communities. CalCCA will gain a better understanding of its contentions after reviewing the IOUs' responses to the March 21, 2024, Ruling directing the utilities to respond to questions regarding energization timelines,⁷ and after reviewing party comments on the Scoping Memo. At this initial stage, however, CalCCA intends to make the following contentions, among others, as necessary, over the course of its involvement in this proceeding:

- Statewide energization timelines should be adopted to promote timely and efficient interconnection of customers;
- The Commission must establish a clear procedure and venue for customers to report on energization delays; and
- The factors contributing to energization delays, from the perspective of all parties including the IOUs, CCAs, local government agencies and environmental resource boards, and customers, must be explored through this proceeding.

These contentions are reasonably pertinent and will contribute meaningfully to the Commission's development of a framework addressing barriers to timely energization of customer connections.

IV. NOTICE

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

Evelyn Kahl
CALIFORNIA COMMUNITY CHOICE ASSOCIATION
One Concord Center
2300 Clayton Road, Suite 1150
Concord, CA 94520
(510) 980-9459
regulatory@cal-cca.org

⁷ R.24-01-018, *Administrative Law Judge's Ruling Directing Utility Responses to Questions Regarding Energization Timelines* (Mar. 21, 2024).

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,

A handwritten signature in blue ink that reads "Evelyn Kahl". The signature is written in a cursive, flowing style.

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

April 5, 2024