

**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)

Expedited Application of Pacific Gas and Electric Company Pursuant to the Commission's Approved Energy Resource Recovery (ERRA) Trigger Mechanism.
(U 39 E)

Application No. 23-07-012
(Filed July 28, 2023)

(NOT CONSOLIDATED)

Application of Southern California Edison Company (U338E) For Approval of Its 2024 ERRA Forecast Proceeding Revenue Requirement.

Application No. 23-06-001
(Filed June 1, 2023)

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

Application 23-05-013
(Filed May 15, 2023)

**JOINT MOTION FOR CLARIFICATION OR MODIFICATION OF THE
PROCEDURAL SCHEDULE OF
CALIFORNIA COMMUNITY CHOICE ASSOCIATION, SAN DIEGO COMMUNITY
POWER AND CLEAN ENERGY ALLIANCE**

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April 25, 2024

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

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)
Expedited Application of Pacific Gas and Electric Company Pursuant to the Commission’s Approved Energy Resource Recovery (ERRA) Trigger Mechanism. (U 39 E)	Application No. 23-07-012 (Filed July 28, 2023)
(NOT CONSOLIDATED)	
Application of Southern California Edison Company (U338E) For Approval of Its 2024 ERRA Forecast Proceeding Revenue Requirement.	Application No. 23-06-001 (Filed June 1, 2023)
Application of SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) for Approval of its 2024 Electric Procurement Revenue Requirement Forecasts, 2024 Electric Sales Forecasts, and GHG-Related Forecasts	Application 23-05-013 (Filed May 15, 2023)

**JOINT MOTION FOR CLARIFICATION OR MODIFICATION OF THE
PROCEDURAL SCHEDULE OF
CALIFORNIA COMMUNITY CHOICE ASSOCIATION, SAN DIEGO COMMUNITY
POWER AND CLEAN ENERGY ALLIANCE**

California Community Choice Association (CalCCA)¹ submits this *Joint Motion for Clarification or Modification of the Procedural Schedule* (Motion) in the above-captioned

¹ 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

proceedings pursuant to Rule 11.1 of the California Public Utilities Commission’s Rules of Practice and Procedure. CalCCA submits this Motion on behalf of itself, San Diego Community Power (SDCP) and Clean Energy Alliance (CEA) (collectively, “CCA Parties”). Pursuant to Rule 1.8(d), CalCCA represents that SDCP and CEA authorize CalCCA counsel to sign and file this Motion on behalf of those respective parties. The CCA Parties communicated with the parties prior to filing this Motion and can represent the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), Direct Access Customer Coalition (DACC), and Alliance for Retail Energy Markets (AREM) support this Motion.

The Assigned Commissioner’s Scoping Memo and Ruling issued on April 2, 2024 (Scoping Memo) consolidated the above-captioned proceedings “for the sole purpose of addressing outstanding issues related to the definition of and accounting for fixed generation costs in each large investor-owned utility’s 2024 Energy Resource Recovery Account (ERRA) Forecast proceeding.”² To address those issues, the Scoping Memo established the following procedural schedule:

Event	Date
Intervenors’ prepared direct testimony served	May 8, 2024
Prepared rebuttal testimony served	May 22, 2024
Status conference	May 30, 2024
Evidentiary hearing	To be determined
Opening briefs	June 25, 2024
Reply briefs	July 10, 2024
Proposed decision	September 2024
Commission decision	Q4 2024

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 Assigned Commissioner’s Scoping Memo and Ruling at 1 (Apr. 2, 2024).

This procedural schedule leaves ambiguous: 1) whether respondent investor-owned utilities (IOU) may file testimony on May 8 addressing the specific questions the Scoping Memo asks, and 2) whether intervenors have an opportunity to respond to IOU testimony. Through this Motion, CCA Parties request clarification that parties (including both intervenors and respondent IOUs) should make concurrent direct testimony filings on May 8 and concurrent rebuttal testimony filings on May 22.

To the extent the Scoping Memo did not intend intervenors and respondent IOUs to file testimony concurrently, CCA Parties request the Commission modify the procedural schedule to require concurrent filings of direct and rebuttal testimony, similar to the process directed by the original Fixed Generation Cost rulings.³ In the alternative, CCA Parties request the Commission modify the procedural schedule to allow intervenors to file surrebuttal testimony to IOU rebuttal testimony. Given that the purpose of this consolidated proceeding is to address issues related to the accounting and definition of the IOUs' fixed generation costs, it follows the IOUs—who possess the most information about the nature, magnitude and accounting of those costs—should have an opportunity to file testimony addressing the questions in the Scoping Memo, and, importantly, that intervenors should have an opportunity to review and respond to any testimony the IOUs file.

³ The original Fixed Generation Cost rulings refer to parallel rulings issued in each of the IOU's 2024 ERRA Forecast proceedings on August 1, 2023 directing parties to file concurrent opening and reply comments regarding Fixed Generation Costs. *See* A.23-05-012, Administrative Law Judge's Ruling Directing Parties to Comment Regarding Fixed Generation Costs (Aug. 1, 2023); A.23-05-013, Administrative Law Judge's Ruling Directing Parties to Comment Regarding Fixed Generation Costs (Aug. 1, 2023); A.23-06-002, Administrative Law Judge's Ruling Directing Parties to Comment Regarding Fixed Generation Costs (Aug. 1, 2023).

In the interest of clarity, CCA Parties recommend the following specific clarifications or modifications to the procedural schedule established in the Scoping Memo.⁴

Event	Date
<u>Intervenors' Parties'</u> prepared direct testimony served	May 8, 2024
<u>Parties'</u> Prepared rebuttal testimony served	May 22, 2024
Status conference	May 30, 2024
Evidentiary hearing	To be determined
Opening briefs	June 25, 2024
Reply briefs	July 10, 2024
Proposed decision	September 2024
Commission decision	Q4 2024

CCA Parties appreciate the Commission's consideration of this request.

Respectfully submitted,



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April 25, 2024

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⁴ To the extent the Commission grants the IOUs' Request to Extend Schedule made on April 25, 2024, the CCA Parties request the Commission clarify that parties should file concurrent direct and rebuttal testimony by the extended deadlines listed in that Request.