



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

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Order Instituting Rulemaking to Establish  
Energization Timelines.

R.24-01-018

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S  
OPENING COMMENTS ON ASSIGNED COMMISSIONER'S SCOPING  
MEMO AND RULING**

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May 3, 2024

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California Community Choice Association<sup>1</sup> (CalCCA) submits these opening comments on the *Assigned Commissioner's Scoping Memo and Ruling*<sup>2</sup> (Ruling), dated March 28, 2024, and the *Email Ruling Adjusting Phase 1 Schedule and Addressing the April 2, 2024 Joint Investor-Owned Utilities' Motion*<sup>3</sup> (Email Ruling), dated April 8, 2024. The Email Ruling, among other items, extends the deadline for parties to file opening comments on the Scoping Ruling, and updates the Phase 1 Schedule.

**I. INTRODUCTION**

CalCCA represents community choice aggregators (CCAs) which provide generation and other services to customers. CCA customer electricity continues to be delivered by the IOUs over their transmission and distribution lines. CCA customer energization and interconnection

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<sup>1</sup> 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.

<sup>2</sup> *Assigned Commissioner's Scoping Memo and Ruling*, R.24-01-018 (Mar. 28, 2024).

<sup>3</sup> *Email Ruling Adjusting Phase 1 Schedule and Addressing the April 2, 2024 Joint Investor-Owned Utilities' Motion*, R.24-01-018 (Apr. 8, 2024).

requests are therefore not accomplished through CCAs, but rather the IOU that provides the transmission and distribution services to the CCA customer.

CalCCA's membership comprises 24 CCAs formed by over 200 local government entities. Governed by local elected and appointed officials, CCAs in California provide electric service to approximately 14 million users of electricity in the state – equivalent to 37 percent of customers in the IOU territories.

Many CCAs are working to accelerate vehicle and building electrification in their service territories, which is being hampered by delays and customer service frustrations in connection with energization and interconnection with the IOUs. CalCCA looks forward to participating in this proceeding to improve the energization and interconnection processes for CCA customers. CCAs look forward to contributing to smoother processes from the IOU perspective, the perspective of local permitting and governmental approvals, and from the customer perspective in terms of transparency and ability to voice concerns during the process.

## **II. THE SCOPING RULING ADEQUATELY FRAMES THE ISSUES FOR PHASE 1**

The Phase 1 Scoping Memo accurately frames the issues to be decided prior to the September 2024 legislative deadline. The Scoping Ruling provides an excellent framework for further discussions in the Status Conference of how to ensure a thorough inquiry into many of the fact-intensive questions to be addressed. Specifically, the Scoping Ruling addresses the following general questions that are of particular importance to CCAs:

1. How can statewide energization **timelines** be adopted to promote timely and efficient interconnection of customers, including CCA customers?
2. How can the **process** be improved to ensure transparency, accuracy, and timeliness of communications **to customers**, and **between IOUs and CCAs**, regarding the interconnection and energization process? In addition, when and how should customers **report** their interconnection delays to the Commission?

3. What are the root causes of the current **delays** in the interconnection and energization process, and how can the Commission, IOUs, CCAs, and other parties address and improve these root causes?
4. How can the IOUs' **implementation** of the new timelines be **tracked**, and under what criteria should the IOUs be required to report on their evaluation of and compliance with the new timelines?
5. How should **environmental and social justice communities** be supported in connection with the new timelines and processes?

### III. CONCLUSION

CalCCA looks forward to an ongoing dialogue with the Commission and stakeholders.

Respectfully submitted,



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

May 3, 2024