



**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  
STATUS CONFERENCE STATEMENT**

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May 20, 2024

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California Community Choice Association<sup>1</sup> (CalCCA) submits this Status Conference Statement pursuant to the *Email Ruling Providing Instructions for May 21, 2024, Status Conference*<sup>2</sup> (Ruling), dated May 8, 2024.

**I. INTRODUCTION**

As noted in the *Assigned Commissioner's Scoping Memo and Ruling* (Scoping Memo), the Commission is required by Public Utilities Code section 934(a) to do the following by September 30, 2024: (1) establish average and maximum target energization time periods for the investor-owned utilities (IOU), and (2) establish a procedure for customers to report energization delays to the California Public Utilities Commission (Commission).<sup>3</sup> The Scoping Memo also includes additional related questions to inform its actions required by September 30,

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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> *Email Ruling Providing Instructions for May 21, 2024, Status Conference*, R.24-01-018 (May 8, 2024).

<sup>3</sup> *Assigned Commissioner's Scoping Memo and Ruling*, R.24-01-018 (Mar. 28, 2024) (Scoping Memo), at 1.

2024, including: (1) information to be tracked after the targets are set; (2) reporting processes for Commission review of IOU compliance with the targets; (3) whether and how IOU customer engagement needs to improve; (4) whether specific end-use projects or projects needing upstream capacity upgrades should have unique energization targets; (5) IOU annual reporting criteria; (6) impacts on environmental and social justice communities; (7) how often the targets should be updated; and (8) whether the targets should be phased-in.<sup>4</sup>

After receiving data from the IOUs in response to the Administrative Law Judge's questions,<sup>5</sup> and comments on the Order Instituting Rulemaking and Scoping Memo, the Commission is now considering additional process and/or data necessary for its Phase 1 Decision. The Ruling therefore provides instructions for the May 21, 2024, Status Conference, requesting that parties address the following two (2) questions:

1. Upon review of the opening and reply comments on the Scoping Memo and Ruling issued on March 28, 2024, what additional data or testimony is necessary to resolve the issues raised for Phase 1 of Rulemaking (R) 24-01-018?
2. If so, what additional information is necessary to resolve the Phase 1 issues in R.24-01-018, and how should it be obtained?

As explained in more detail below, CalCCA recommends that the Commission:

- Immediately establish a collaborative working group, with Commission staff, the IOUs, and other stakeholders, to:
  - Identify and obtain additional data necessary, and arrive at consensus on Phase 1 recommendations for the Commission; and
  - Continue working in Phase 2 to further refine the timelines and processes established in Phase 1.
- In the alternative, hold one or more workshops in Phase 1 to narrow the issues and additional data needed, and begin a working group process for Phase 2.

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<sup>4</sup> Scoping Memo, at 4-6.

<sup>5</sup> *Administrative Law Judge's Ruling Directing Utility Responses to Questions Regarding Energization Timelines*, R.24-01-018 (Mar. 21, 2024) (ALJ Ruling).

## II. CALCCA RESPONSE TO RULING QUESTIONS

Review of the Scoping Memo opening and reply comments as well as the IOUs' responses to the ALJ Ruling have raised many more questions than provided answers to inform the energization timelines and customer dispute process Public Utilities Code section 934(a) requires the Commission to set by September 30, 2024. The IOUs explained existing processes and timelines but fail to address how their proposals to maintain the existing timelines will meet the aggressive energization needs mandated by state electrification goals. Non-IOU party comments demonstrate disagreement that the current IOU processes or timelines are effective, given the real-world scenarios of both IOU delays to these processes as well as non-IOU caused delays in local permitting or supply chain issues. In addition, varying accounts of customer service shortfalls on the part of IOUs are not matched by representations from the IOUs.

Given the limited timeframe between now and the September 30, 2024, deadline, CalCCA agrees with party recommendations that a collaborative working group should be immediately established to develop the record through Phases 1 and 2.<sup>6</sup> The working group can gather additional data not only from the IOUs, but also from customers experiencing delays to get a better understanding of where in the IOU timelines changes are needed. The working group can also develop refinements to the steps (and the definition of those steps) of the energization timelines and processes based on robust data and forecasts of energization requests based on load and location. In addition, the working group can refine the tracking, IOU reporting, and customer dispute resolution process if necessary. In the alternative, the Commission should hold

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<sup>6</sup> See, e.g., *Opening Comments of the Interstate Renewable Energy Council, Inc. on the Commissioner's Scoping Memo and Ruling*, R.24-01-018 (May 3, 2024); *Reply Comments of the Interstate Renewable Energy Council, Inc. on the Commissioner's Scoping Memo and Ruling*, R.24-01-018 (May 17, 2024); *Opening Comments of Environmental Defense Fund and Natural Resources Defense Council on Scoping Memo*, R.24-01-018 (May 3, 2024).

workshops for Phase 1 to focus on data gathering, and begin the Phase 2 working group process as soon as possible.

### **III. CONCLUSION**

CalCCA appreciates the opportunity to submit this Status Conference Statement and looks forward to participating in the Status Conference on May 21, 2024.

Respectfully submitted,

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

Evelyn Kahl,  
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CALIFORNIA COMMUNITY CHOICE  
ASSOCIATION

May 20, 2024