

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



**FILED**

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R2211013

Order Instituting Rulemaking to Consider  
Distributed Energy Resource Program Cost-  
Effectiveness Issues, Data Access and Use,  
and Equipment Performance Standards.

R.22-11-013

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

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June 27, 2024

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

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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, 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 members and their customers. CCAs provide electric generation services and other services to customers. Distribution services are provided by the investor-owned utilities (IOUs), with CCA customers paying the IOU distribution and transmission rates. Many of CalCCA's members have Distributed Energy Resource (DER) customer programs that may be impacted by decisions in this proceeding.

CCAs and their customers have particular interest in methodologies to accurately evaluate the cost-effectiveness of DERs. CCAs and their customers also have interest leveraging DERs to provide grid needs. CalCCA is interested in how DERs can be leveraged to support individual CCA customer and overall CCA and community needs, as well as grid needs. CalCCA is also interested in the broad data access issues to be considered in this proceeding. As recognized in the Ruling setting the scope of work for the Data Working Group consultant,<sup>3</sup> CCAs have broad data needs to ensure effective utilization of DERs. Such data needs include, but are not limited to: (1) consistent, accessible, and transparent data from the IOUs regarding customer usage and program enrollment in demand response and DER programs, (2) improved Integration Capacity Analysis data to support optimal siting of DERs within the IOUs' service territories, (3) greater accuracy in the demand forecast from DER load, and (4) alignment with other Commission proceedings considering data access issues. Overall, the CCAs seek to work with the proposed Data Working Group to identify solutions to overcoming the various data challenges that CCAs face.

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<sup>3</sup> *Assigned Commissioner's Ruling Setting the Scope of Work for the Consultant, Scope of Work for the Data Working Group, and Formation of the Data Working Group*, Rulemaking (R.) 22-11-013 (Dec. 1, 2023) (Ruling).

### III. STATEMENT OF FACTUAL AND LEGAL CONTENTIONS

CalCCA intends to contribute to this proceeding the factual and legal contentions of its members regarding the cost-effectiveness of DERs and data access issues. Such contentions will be developed as the proceeding moves forward, including through CalCCA's active participation in the Data Working Group. Given CalCCA's members' interests in DERs and CCA data access, CalCCA's interests and contentions in this proceeding are reasonably pertinent and will result in meaningful contributions to the record.

### IV. NOTICE

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

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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

June 27, 2024