

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

Order Instituting Rulemaking to Continue Implementation and Administration, and Consider Further Development, of California Renewables Portfolio Standard Program.

FILED  
PUBLIC UTILITIES COMMISSION  
FEBRUARY 26, 2015  
SAN FRANCISCO, CALIFORNIA  
RULEMAKING 15-02-020

**ORDER INSTITUTING RULEMAKING TO CONTINUE IMPLEMENTATION AND ADMINISTRATION, AND CONSIDER FURTHER DEVELOPMENT, OF CALIFORNIA RENEWABLES PORTFOLIO STANDARD PROGRAM**

**Summary**

This rulemaking continues implementation and administration of the California renewables portfolio standard (RPS) program.<sup>1</sup> As a successor docket to Rulemaking (R.) 11-05-005, this proceeding addresses ongoing oversight of the RPS program. This includes reviewing RPS procurement plans submitted by retail sellers; providing tools for analysis of and reporting on progress of retail sellers and the RPS program as a whole; assessing retail sellers' compliance with their RPS obligations; taking enforcement action if necessary; and integrating new legislative mandates and administrative requirements into the administration of the RPS program.

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<sup>1</sup> Established by Senate Bill 1078 (Sher), Stats. 2002, ch. 516, the RPS program has been revised in both large and small ways over the dozen years it has been in effect. The RPS program is codified at Pub. Util. Code §§ 399.11-399.32.

This rulemaking also provides a forum to lay the groundwork for possible further development of the RPS program, through exercise of the Commission's authority under Assembly Bill 327 (Perea), Stats 2013, ch. 611, to increase the percentage of RPS-eligible electricity sold to retail end-user customers; through examination of the relationship of the RPS program to other state mandates that include the electricity sector (e.g., reduction in emission of greenhouse gases); and through coordination with other proceedings and initiatives of the Commission.

This order closes R.11-05-005 for purposes of Pub. Util. Code § 1701.5. R.11-05-005 remains open only to consider pending petitions for modification.

## **1. Background**

The California renewables portfolio standard (RPS) program began with a mandate requiring all retail sellers to provide 20 percent of the electricity they sold to retail end-user customers from RPS-eligible generation by the end of 2017.<sup>2</sup> The Legislature has modified the goal and details of procurement and enforcement policy several times since the original enactment. The most recent major changes were made by SB 2(1X) (Simitian), Stats. 2011, ch.1. That legislation, among other things, set a new target for retail sellers of 33 percent of retail sales from RPS-eligible generation by 2020. It also revised the procurement, compliance, and enforcement frameworks for the RPS program. The

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<sup>2</sup> The original target was set in Senate Bill (SB) 1078 (Sher), Stats. 2002, ch. 516. Retail sellers, for RPS purposes, include investor-owned utilities (IOUs), electric service providers (ESPs), and community choice aggregators (CCAs). Pub. Util. Code § 399.12(j). All further references to sections are to the Public Utilities Code unless otherwise specified.

SB 2 (1X) also extended obligations under the RPS program to California publicly owned utilities (POUs). The California Energy Commission (CEC) is responsible for oversight and administration of the RPS program for POUs.

Commission implemented many of the changes made by SB 2 (1X) and other recent legislation in a series of decisions.<sup>3</sup>

In Assembly Bill (AB) 327 (Perea), Stats 2013, ch. 611, the Legislature, among other things, provided authority for the Commission to increase the required percentage of RPS-eligible electricity provided by retail sellers to their customers.<sup>4</sup> The Commission has not exercised this authority to date.

In addition to legislatively mandated requirements, the administration of the RPS program has included a number of elements designed to improve the operation of the program. These elements have been developed by the Commission, with extensive participation by the parties to the RPS proceeding, as a result of experience with the RPS program. This effort to monitor the program, identify potential improvements, and implement them is an ongoing feature of each of the RPS proceedings.

Although the RPS program is an important element in the attainment of the state's greenhouse gas (GHG) reduction goals,<sup>5</sup> the Commission's RPS proceedings to date have not expressly addressed the role of the RPS program in California's GHG policy. In view of the governor's recent exhortation to plan for GHG reduction beyond the goals set by AB 32, the Commission may consider the

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<sup>3</sup> These include, among others, Decision (D.) 11-12-020, D.11-12-052, D. 12-06-038, D.13-05-035, D.14-12-023, and D.14-12-081.

<sup>4</sup> Codified at Section 399.15(b)(3), this authorization provides:

The commission may require the procurement of eligible renewable energy resources in excess of the quantities specified in paragraph (2) [setting procurement requirements for the compliance periods 2011-2013; 2014-2016; 2017-2020; and annual compliance periods beginning in 2021].

<sup>5</sup> The Climate Change Scoping Plan of the Air Resources Board, implementing AB 32 (Pavley), Stats. 2006, ch. 488, builds in the achievement of the 33% RPS procurement goal to its GHG reduction goals. Climate Change Scoping Plan at 44. (October 2008).

relationship of the RPS program going forward to the state's broad GHG reduction goals.<sup>6</sup>

### **1.1. Procedural Background**

The record in Rulemaking (R.) 11-05-005 is transferred to this successor proceeding. Various issues remaining in R.11-05-005, discussed more fully in Section 2.1, below, are brought into this proceeding. R.11-0-05-005 is closed for purposes of § 1701.5, and remains open only as necessary for the limited purposes of considering pending petitions for modification.

## **2. Preliminary Scoping Memo**

In accordance with Rule 7.1(d) of the Commission's Rules of Practice and Procedure<sup>7</sup>, this Order Instituting Rulemaking (OIR) includes a preliminary scoping memo addressing the issues, preliminary determination of category, preliminary determination of need for hearing, and preliminary schedule.

### **2.1. Issues**

Similar to prior RPS implementation and administration proceedings, this rulemaking will have three principal tasks:

- Continuing and completing specific tasks identified in R.11-05-005, but not completed prior to the issuance of this new OIR;

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<sup>6</sup> In his inaugural address in January 2015, Governor Brown proposed that, among other actions to address climate change, by 2030 California should "increase from one-third to 50 percent our electricity derived from renewable sources." Inaugural Address, Remarks as Prepared (January 5, 2015). The governor's remarks may be found at <http://www.gov.ca.gov/news.php?id=18828>.

In Executive Order S-3-05, the prior governor, Arnold Schwarzenegger, adopted a GHG reduction goal of 80% reduction below 2010 emissions by 2050.

<sup>7</sup> All rules cited are contained in the Commission's Rules of Practice and Procedure unless otherwise specified.

- Continuing, monitoring, reviewing, and improving elements of the RPS program that have previously been put in place, including identifying additional program elements that could be developed;
- Implementing new statutory requirements that may be mandated during the course of this proceeding.

A fourth task, considering expansion of the RPS program, is newly included in this OIR.

### **2.1.1. Specific Implementation and Administration Tasks in this Rulemaking**

#### **2.1.1.1. Tasks to be carried over from R.11-05-005 to this rulemaking**

1. Completion of the current round of revisions to the RPS Calculator. (*See* Administrative Law Judge's (ALJ) Ruling (1) Issuing an Energy Division Proposal on the Renewables Portfolio Standard Calculator, (2) Entering the Proposal into the Record, and (3) Setting a Comment and Workshop Schedule (October 10, 2014).)
2. Adoption of tariff, standard contract, and additional supporting documents for implementing the bioenergy feed-in tariff set up by D.14-12-081.
3. Adoption of procurement expenditure limitations for RPS procurement of IOUs. (*See* § 399.15(c)-(g); ALJ Ruling Requesting Comments on Revised Staff Proposal and Updated Alternative Proposals for a Methodology to Implement Procurement Expenditure Limitations for the Renewables Portfolio Standard Program (February 22, 2014).)
4. Revision of the process for determining least-cost, best-fit (LCBF) eligible renewable energy resources. (*See* § 399.113(a)(4)).

5. Development of a methodology for calculating renewable integration cost adder(s).

**2.1.1.2. Tasks related to continuing, monitoring, reviewing, and improving the RPS program**

1. Specifying requirements for, reviewing, and approving RPS procurement plans.  
(See § 399.13(a)(5); D.14-11-042.)
2. Ongoing monitoring and review of all RPS procurement methods and tariffs, including but not limited to IOU solicitations; renewable auction mechanism; general RPS feed-in tariff (ReMAT); bioenergy feed-in tariff.
3. Monitoring, reviewing, and improving RPS compliance reporting formats developed by Energy Division staff in consultation with parties.
4. Reviewing compliance progress of retail sellers and taking enforcement action if required.
5. Undertaking revision, as needed, to the various components of the RPS Calculator.
6. Identifying and addressing safety issues related to the RPS program, including but not limited to safety impacts related to RPS procurement, as well as impacts connected with climate change.

**2.1.1.3. Tasks related to implementing new statutory requirements**

Since it is not possible to predict when any new statutory requirements will be created for the RPS program during the life of this proceeding, this task of statutory implementation will take place when and as needed.

**2.1.1.4. Tasks related to further development of RPS program**

1. Using the authority provided by § 399.15(b)(3) to explore increasing the RPS procurement percentage for later compliance periods.
2. Considering the integration of GHG reduction goals and metrics into RPS procurement methods (e.g., LCBF methodology).

**2.2. Consideration of Modifications to Prior RPS Decisions**

The issues for this proceeding may include changes to the RPS program, whether through statutory revisions or the Commission's own determinations. Parties to this rulemaking should be aware that, in order to implement necessary changes to the RPS program, the Commission may modify (on a present and going forward basis) some, all, or none of its prior RPS program decisions. These decisions include (but are not necessarily limited to):

D.03-06-071; D.03-12-065; D.04-06-014; D.04-06-015; D.04-07-029;  
D.04-09-036; D.05-05-011; D.05-07-039; D.05-10-014; D.05-11-025;  
D.05-12-042; D.06-01-029; D.06-01-046; D.06-03-016; D.06-05-023;  
D.06-05-039; D.06-10-019; D.06-10-050; D.07-02-011; D.07-03-046;  
D.07-07-025; D.07-05-028; D.07-07-027; D.07-07-044; D.07-07-057;  
D.07-09-024; D.07-11-025; D.08-02-008; D.08-02-010; D.08-04-009;  
D.08-05-029; D.08-08-028; D.08-10-026; D.09-06-050; D.09-11-014;  
D.10-03-021; D.10-05-018; D.10-12-048; D.11-01-016; D.11-01-025;  
D.11-01-026; D.11-04-004; D.11-04-007; D.11-04-008; D.11-04-030;  
D.11-09-002; D.11-11-012; D.11-12-020; D.11-12-052; D.12-05-035;  
D.12-06-038; D. 12-11-049; D.13-01-041; D.13-05-034; D.13-09-033;  
D.13-11-024; D.14-11-042; D.14-12-023; D.14-12-081.

### **2.3. Coordination Between This Rulemaking and Other Related Proceedings**

The RPS proceeding has historically coordinated with the Commission's long term procurement planning (LTPP) proceeding (R.13-12-010). We anticipate that the close relationship between these two proceedings will continue with this rulemaking, without the need for a formal order of coordination.

In addition, the RPS program has connections and intersections with many other Commission proceedings, including but not limited to Rule 21 interconnection (R.11-09-001), resource adequacy (R.14-10-010), distributed generation (R.12-11-005), and energy storage (A.14-02-006). Formal coordination is not required among these proceedings, but Energy Division staff and parties to this rulemaking are encouraged to keep themselves apprised of developments in related proceedings.

### **3. Collaborative Process with California Energy Commission**

The Commission and its staff have successfully worked in a collaborative relationship with the CEC and its staff in several proceedings, including R.01-10-024 (RPS Phase), R.04-04-026, R.06-02-012, R.06-05-027, R.08-08-009, and R.11-05-005. This has promoted good communication between agencies sharing responsibilities for the RPS program.<sup>8</sup> We will continue that collaborative relationship in this proceeding, to the extent allowed by the limited resources at each agency. As has been the case in the past, the Commission's Executive Director may work with the CEC's Executive Director to review and refine the terms of the staff collaboration, as necessary.

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<sup>8</sup> See, e.g., § 399.25.

#### **4. Category and Need for Hearing**

Rule 7.1(d) provides that the OIR “shall preliminarily determine the category and need for hearing...” This rulemaking is preliminarily determined to be ratesetting, as that term is defined in Rule 1.3(e). This preliminary determination is not appealable, but shall be confirmed or changed by assigned Commissioner’s ruling. The assigned Commissioner’s determination as to category is subject to appeal pursuant to Rules 7.3 and 7.6.

We anticipate that the issues in this proceeding may be resolved through a combination of comments, workshops and testimony, but it is reasonably possible that evidentiary hearings will be needed as to at least some issues in the proceeding. We therefore preliminarily determine that hearing is needed. Any person who objects to the preliminary hearing determination shall state the objections in their comments on this OIR, described in Section 7, below. The assigned Commissioner will determine the need for hearing in the Scoping Ruling issued following a prehearing conference (PHC).

#### **5. Ex Parte Communications**

*Ex parte* communications in this proceeding are governed by the requirements for a ratesetting proceeding found in Article 8 of the Commission’s Rules, Rule 8.1 et seq. In addition, Pacific Gas and Electric Company is subject to the *ex parte* restrictions adopted in D.14-11-041.

#### **6. Preliminary Schedule**

The preliminary schedule for this proceeding is set forth below and includes provisions for the filing of comments on the OIR. The assigned Commissioner or assigned ALJ may change the preliminary schedule as necessary.

Item	Date
Comments on the OIR filed and served	20 days from issuance (mailing) of OIR
Reply comments on the OIR filed and served	30 days from issuance of OIR
Prehearing conference	April 16, 2015 10 a.m., Commission Auditorium
Scoping memo	Second quarter 2015
Ruling requiring submission of 2015 RPS procurement plans	Second quarter 2015
Other tasks in this proceeding	As determined in scoping memo and subsequently by presiding officer

**7. Invitation to Comment on Preliminary Scoping Memo and Schedule**

Parties are invited to comment on the Preliminary Scoping Memo and schedule established in this OIR. Comments may be filed and served not later than 20 days after the issuance of this OIR. Reply comments, if any, may be filed and served not later than 30 days after the issuance of this OIR.

Parties should focus their comments on the OIR on the issues set forth in the preliminary scoping memo, the preliminary schedule, and any objections to the preliminary determinations below. Comments directed to the issues identified within the preliminary scope of this proceeding may include whether to revise the issues; how to prioritize the issues to be resolved; how procedurally to address these issues; and proposed timeline for resolving the issues identified.

Comments are limited to 25 pages. Reply comments are limited to 10 pages. The comments and reply comments on the OIR will help to inform the PHC to be held in this proceeding.

## **8. Respondents**

All retail sellers, as defined in Section 399.12(j), are respondents in this proceeding. Respondent electrical corporations are listed in Appendix A. Respondent community choice aggregators (CCAs) are listed in Appendix B. Respondent electric service providers (ESPs) are listed in Appendix C.<sup>9</sup>

## **9. Service of OIR**

This OIR shall be served on all respondents.

In addition, in the interest of broad notice, this OIR will be served on the official service lists for the following proceedings:

- R.11-05-005 (current RPS proceeding);
- R.13-12-010 (long term procurement planning);
- R.14-10-010 (resource adequacy);
- R.12-11-005 (California Solar Initiative and other distributed generation);
- R.14-07-002 (net energy metering successor);
- R.14-08-013 (distribution resources plans); and
- A.14-02-006 (energy storage applications).

Finally, continuing our practice in R.11-05-005, because of the statewide application of the RPS program, this OIR will be served on all publicly owned utilities, listed in Appendix D.

Service of the OIR does not confer party status or place any person who has received such service on the Official Service List for this proceeding, other

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<sup>9</sup> Any new CCA or ESP not listed in Appendix B or Appendix C is obligated to make itself a respondent by notifying the Commission's Process Office that it should be placed on the official service list of this proceeding as a party and respondent.

than respondents. Instructions for obtaining party status or being placed on the official service list are given in section 11 of this OIR, below.

#### **10. Filing and Service of Comments and Other Documents**

Filing and service of comments and other documents in the proceeding are governed by the rules contained in Article 1 of the Commission's Rules, particularly Rules 1.5 through 1.10 and 1.13.

The Commission encourages electronic filing and e-mail service in this Rulemaking. Information about electronic filing may be found at <http://www.cpuc.ca.gov/PUC/efiling>. E-mail service is governed by Rule 1.10. Documents served by e-mail should be in Microsoft Word or Excel formats to the extent possible. E-mail service of documents must occur no later than 5:00 p.m. on the date that service is scheduled to occur.

If you use e-mail service, you must also provide a paper copy to the assigned Commissioner and ALJ. All paper copies of documents that are served should be printed double-sided. Paper copies of the service list need not be provided to the ALJ or assigned Commissioner, but a paper copy of the certificate of service, together with the filing, is required.

If you have questions about the Commission's filing and service procedures, contact the Docket Office at (415) 703-2472.

#### **11. Addition to Official Service List**

Addition to the official service list is governed by Rule 1.9(f).

Respondents in this rulemaking are parties to the proceeding (*see* Rule 1.4(d)) and will be immediately placed on the official service list. Respondents must confirm their primary representative with the Commission's Process office within seven days of the date of issuance of this OIR.

Unlike past RPS rulemakings, this OIR will not carry over the service list from the current RPS proceeding, R.11-05-005. However, any party to R.11-05-005 that is not also a respondent in this rulemaking may make a request to the Commission's Process Office within seven days of the date of issuance of this OIR to be added as a party in this proceeding, without needing to take any other action. The request must be sent to the Process Office by e-mail ([process\\_office@cpuc.ca.gov](mailto:process_office@cpuc.ca.gov)) or letter (Process Office, California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, California 94102). Please include the docket number of this rulemaking in the request. Persons listed under "State Service" in the service list for R.11-05-005 may follow the same procedure to be placed on the "State Service" section of the official service list for this rulemaking.

Any party to R.11-05-005 that does not request listing as a party to this rulemaking within seven days of the issuance of this OIR may become a party to this rulemaking by any of the other methods explained below: filing comments or reply comments on the OIR, filing a motion for party status, or appearing at the PHC and making an oral motion for party status.

Persons who file comments or reply comments to this OIR thereby become parties to the proceeding (*see* Rule 1.4(a)(2)) and will be added to the "Parties" category of the official service list upon such filing. In order to ensure service of comments and other documents and correspondence in advance of obtaining party status, such persons should promptly request addition to the "Information Only" category as described below; they will be removed from that category upon obtaining party status.

Persons wishing to obtain party status without filing comments or reply comments on this OIR may either appear at the PHC and make an oral motion to

become a party, as provided in Rule 1.4(a)(3), or may file a written motion for party status as provided in Rule 1.4(a)(4).

Any person will be added to the “Information Only” category of the official service list upon request at any time, to receive electronic service of all documents in the proceeding. Persons wishing to receive timely service of the initial comments and other documents and correspondence in the proceeding, should make their request within 20 days of the issuance (mailing) of this rulemaking (*see* Rule 1.9(f)). The request must be sent to the Process Office by e-mail ([process\\_office@cpuc.ca.gov](mailto:process_office@cpuc.ca.gov)) or letter (Process Office, California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, California 94102). Please include the docket number of this rulemaking in the request.

Only one representative for each party may be listed in the “Parties” section of the official service list. If a party wishes to have more persons on the service list, they must request listing in the “Information Only” category.

## **12. Subscription Service**

Persons may monitor this proceeding by subscribing to receive electronic copies of documents in this proceeding that are published on the Commission’s website. There is no need to be on the official service list in order to use the subscription service. Instructions for enrolling in the subscription service are available on the Commission’s website at <http://subscribecpuc.cpuc.ca.gov/>.

## **13. Public Advisor**

Any person or entity interested in participating in this rulemaking who is unfamiliar with the Commission’s procedures should contact the Commission’s Public Advisor in San Francisco at (415) 703-2074 or (866) 849-8390 or e-mail [public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov); or in Los Angeles at (213) 576-7055 or (866) 849-8391, or e-mail [public.advisor.la@cpuc.ca.gov](mailto:public.advisor.la@cpuc.ca.gov). The TYY number is (866) 836-7825.

#### **14. Intervenor Compensation**

In accordance with Rule 17.1, any notice of intent to claim intervenor compensation in this proceeding must be filed and served not later than 30 days after the date of the PHC.

### **O R D E R**

**IT IS ORDERED** that:

1. This rulemaking is open to continue implementation and administration, and consider further development of, the California renewables portfolio standard program.
2. All retail sellers, as defined in Public Utilities Code Section 399.12(j), are named as respondents and are parties to this proceeding pursuant to Rule 1.4(d) of the Commission's Rules of Practice and Procedure. A list of electrical corporations is provided in Appendix A; a list of community choice aggregators is provided in Appendix B; and a list of electric service providers is provided in Appendix C.
3. Any electric service provider (ESP) that, subsequent to the date of this Order Instituting Rulemaking, becomes registered to provide service through direct access transactions, will automatically become a respondent to this proceeding. An ESP that becomes a respondent must notify the Commission's Process Office that it has become a respondent, and must provide the information necessary for it to be listed as a party on the official service list.
4. Any community choice aggregator (CCA) that, subsequent to the date of this Order Instituting Rulemaking, becomes registered to provide service, will automatically become a respondent to this proceeding. A CCA that becomes a respondent must notify the Commission's Process Office that it has become a

respondent, and must provide the information necessary for it to be listed as a party on the official service list.

5. The issues for this proceeding are as stated in the body of this order.

6. The category of this proceeding is preliminarily determined to be ratesetting.

7. Evidentiary hearings are preliminarily determined to be needed.

8. *Ex parte* communications in this proceeding are governed by the requirements for a ratesetting proceeding found in Article 8 of the Commission's Rules of Practice and Procedure, beginning at Rule 8.1. In addition, Pacific Gas and Electric Company is subject to the *ex parte* restrictions adopted in Decision 14-11-041.

9. The Executive Director will cause this Order Instituting Rulemaking to be served on all respondents and on the service lists for the following Commission proceedings: Rulemaking (R.) 11-05-005, R.12-11-005, R. 13-12-010, R. 14-07-002, R. 14-08-013, R. 14-10-010, and A.14-02-006. In addition, the Executive Director will cause this Order Instituting Rulemaking to be served on all California publicly owned utilities, listed in Appendix D.

10. Interested persons must follow the directions in section 11 of this Order Instituting Rulemaking to become a party or to be placed on the official service list as for "Information Only."

11. The Commission's Process Office will publish the official service list on the Commission's website ([www.cpuc.ca.gov](http://www.cpuc.ca.gov)) as soon as practicable.

12. The assigned Commissioner or the assigned Administrative Law Judge will have ongoing oversight of the service list and may institute changes to the list or the rules governing it, as needed.

13. Persons wishing to comment on this Order Instituting Rulemaking (OIR) may file and serve comments not later than 20 days from the date of issuance of the OIR; reply comments may be filed and served not later than 30 days from the date of issuance of the OIR.

14. The assigned Commissioner or the assigned Administrative Law Judge may modify the preliminary schedule established in this Order Instituting Rulemaking as necessary for the efficient conduct of this proceeding.

15. Persons serving documents in this proceeding must comply with Rule 1.10 of the Commission's Rules of Practice and Procedure regarding electronic mail (e-mail) service. Parties providing e-mail service must also provide a paper copy to the assigned Commissioner and Administrative Law Judge in accordance with the instructions in section 10 of this Order Instituting Rulemaking.

16. Any party that expects to request intervenor compensation for its participation in this rulemaking must file and serve its notice of intent to claim intervenor compensation in accordance with Rule 17.1 of the Commission's Rules of Practice and Procedure (Rules). Any such filing must be made within 30 days from the date the prehearing conference is held. If necessary, the notice of intent may be amended within 15 days of the date of issuance of the Scoping Memo for this proceeding. (Rule 17.1(b).)

17. The record in Rulemaking 11-05-005 is transferred to this successor proceeding.

18. Rulemaking 11-05-005 is closed for purposes of Public Utilities Code Section 1701.5, remaining open only to consider pending petitions for modification.

This order is effective today.

Dated February 26, 2015, at San Francisco, California.

MICHAEL PICKER

President

MICHEL PETER FLORIO

CATHERINE J.K. SANDOVAL

CARLA J. PETERMAN

LIANE M. RANDOLPH

Commissioners

# APPENDIX A

## Investor-Owned Utility Respondents

Bear Valley Electric Service, a division of Golden State Water Company  
Liberty Utilities, LLC  
Pacific Gas and Electric Company  
PacifiCorp  
San Diego Gas & Electric Company  
Southern California Edison Company

(End of Appendix A)

# APPENDIX B

## Community Choice Aggregator Respondents

Clean Power SF  
Lancaster Community Choice Aggregation  
Marin Clean Energy  
Sonoma Clean Power

**(End of Appendix B)**

# APPENDIX C

## Electric Service Provider Respondents

3 Phases Renewables, LLC  
Calpine Power America-CA, LLC  
Commerce Energy, Inc.  
Commercial Energy Of California  
Constellation New Energy, Inc.  
Direct Energy Business  
Direct Energy Services, LLC  
EDF Industrial Power Services (CA), LLC  
GEXA Energy California, LLC  
Glacial Energy Of California, Inc.  
Liberty Power Delaware, LLC  
Liberty Power Holdings, LLC  
Mansfield Power and Gas, LLC  
Noble Americas Energy Solutions  
Palmco Power CA  
Pilot Power Group, Inc.  
Praxair Plainfield, Inc.  
Shell Energy  
Southern California Telephone & Energy  
Tenaska California Energy Marketing, LLC  
Tenaska Power Services Co.  
The Regents of the University of California  
Tiger Natural Gas, Inc.  
YEP Energy

**(End of Appendix C)**

# APPENDIX D

## List of California Publicly-Owned Utilities

Alameda Municipal Power  
Anaheim, City of  
Azusa Light and Water  
Banning, City of  
Biggs Municipal Utilities  
Burbank Water and Power  
Cerritos, City of  
City and County of San Francisco  
Colton Public Utilities  
Corona, City of  
Eastside Power Authority  
Glendale Water and Power  
Gridley Electric Utility  
Healdsburg, City of  
Imperial Irrigation District  
Industry, City of  
Kirkwood Meadows Public Utility District  
Lassen Municipal Utility District  
Lodi Electric Utility  
Lompoc, City of  
Los Angeles Department of Water & Power  
Merced Irrigation District  
Modesto Irrigation District  
Moreno Valley Electric Utility  
Needles, City of  
Palo Alto, City of  
Pasadena Water and Power  
Pittsburg, City of (doing business as Island Energy)  
Port of Oakland  
Port of Stockton  
Power and Water Resources Pooling Authority  
Rancho Cucamonga Municipal Utility  
Redding Electric Utility  
Riverside, City of  
Roseville Electric  
Sacramento Municipal Utility District  
Shasta Lake, City of

Silicon Valley Power (City of Santa Clara)  
Trinity Public Utility District  
Truckee Donner Public Utilities District  
Turlock Irrigation District  
Ukiah, City of  
Vernon, City of  
Victorville Municipal Utilities Services

**(End of Appendix D)**