



FILED
03/17/20
04:59 PM

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

Order Instituting Rulemaking to Review, Revise,
and Consider Alternatives to the Power Charge
Indifference Adjustment.

R.17-06-026

**OPENING COMMENTS OF CALIFORNIA COMMUNITY CHOICE ASSOCIATION
ON PROPOSED DECISION CONSIDERING WORKING GROUP PROPOSALS ON
DEPARTING LOAD FORECAST AND PRESENTATION OF POWER CHARGE
INDIFFERENCE ADJUSTMENT RATE ON BILLS AND TARIFFS**

Evelyn Kahl
General Counsel
California Community Choice Association
One Concord Center
2300 Clayton Road, Suite 1150
Concord, California 94521
Tel: (415) 254-5454
E-Mail: regulatory@cal-cca.org

March 17, 2020

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

Order Instituting Rulemaking to Review, Revise,
and Consider Alternatives to the Power Charge
Indifference Adjustment.

R.17-06-026

**OPENING COMMENTS OF CALIFORNIA COMMUNITY CHOICE ASSOCIATION
ON PROPOSED DECISION CONSIDERING WORKING GROUP PROPOSALS ON
DEPARTING LOAD FORECAST AND PRESENTATION OF POWER CHARGE
INDIFFERENCE ADJUSTMENT RATE ON BILLS AND TARIFFS**

Pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure, the California Community Choice Association (“CalCCA”) ¹ respectfully submits these opening comments on the proposed *Decision Considering Working Group Proposals on Departing Load Forecast and Presentation of Power Charge Indifference Adjustment Rate on Bills and Tariffs* (“Proposed Decision”).

The Proposed Decision reasonably and without error addresses Working Group 1 Issues 8-10 and 12. In particular, CalCCA supports the following conclusions:

- ✓ “The record provided by the July Report does not contain sufficient details for the Commission to adopt and implement a BNI process.”²
- ✓ The investor-owned utilities (“IOUs”) “shall collaborate to submit a joint proposal for bill and tariff changes to show a power charge indifference adjustment line item in their tariffs and bill summary table on all customer bills. Each utility shall submit a Tier 3 Advice Letter by August 31, 2020, to implement the joint proposal by the last business day of 2021.”³

¹ California Community Choice Association represents the interests of 19 community choice electricity providers in California: Apple Valley Choice Energy, CleanPowerSF, Clean Power Alliance, Desert Community Energy, East Bay Community Energy, Lancaster Choice Energy, Marin Clean Energy, Monterey Bay Community Power, Peninsula Clean Energy, Pioneer Community Energy, Pico Rivera Innovative Municipal Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Jacinto Power, San Jose Clean Energy, Silicon Valley Clean Energy, Solana Energy Alliance, Sonoma Clean Power, and Valley Clean Energy.

² *Id.*, Finding of Fact 8 at 27.

³ *Id.*, Ordering Paragraph 2 at 29-30.

- ✓ “The Joint IOU proposal to remove the line loss factor from the calculations underlying the Power Charge Indifference Adjustment should not be adopted. The IOUs may file a petition to modify the relevant decision.”⁴

While CalCCA sought more definitive progress in Working Group 1 on departing load forecasting, insufficient information was made available to design more effective forecasting methods. CalCCA thus supports the Proposed Decision’s conclusion that “current utility practices of load forecasting should continue to be subject to review in respective proceedings (e.g., ERRR, RPS, RA).”

For these reasons, CalCCA supports the Commission’s adoption of the Proposed Decision without modification.

Respectfully submitted,

CALIFORNIA COMMUNITY CHOICE
ASSOCIATION



Evelyn Kahl
General Counsel

March 17, 2020

⁴ *Id.*, Conclusion of Law 9 at 29.