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**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.

Rulemaking 17-06-026

**E-MAIL RULING ON ERRA-RELATED PCIA ISSUES**

Dated September 17, 2021, at San Francisco, California.

/s/ STEPHANIE WANG

Stephanie Wang  
Administrative Law Judge

**From:** Wang, Stephanie; **Sent:** Friday, September 17, 2021 2:14 PM; **To:** [BabBoswell@yahoo.com](mailto:BabBoswell@yahoo.com) <[BabBoswell@yahoo.com](mailto:BabBoswell@yahoo.com)>; [beth@cal-cca.org](mailto:beth@cal-cca.org) <[beth@cal-cca.org](mailto:beth@cal-cca.org)>; [Evelyn@Cal-cca.org](mailto:Evelyn@Cal-cca.org) <[Evelyn@Cal-cca.org](mailto:Evelyn@Cal-cca.org)>; [KHernandez@Pico-rivera.org](mailto:KHernandez@Pico-rivera.org) <[KHernandez@Pico-rivera.org](mailto:KHernandez@Pico-rivera.org)>; [KMorris@HermosaBch.org](mailto:KMorris@HermosaBch.org) <[KMorris@HermosaBch.org](mailto:KMorris@HermosaBch.org)>; [MSkolmik@ceo.LACounty.gov](mailto:MSkolmik@ceo.LACounty.gov) <[MSkolmik@ceo.LACounty.gov](mailto:MSkolmik@ceo.LACounty.gov)>; [Matthew@turn.org](mailto:Matthew@turn.org) <[Matthew@turn.org](mailto:Matthew@turn.org)>; [TomH@SVCleanEnergy.org](mailto:TomH@SVCleanEnergy.org) <[TomH@SVCleanEnergy.org](mailto:TomH@SVCleanEnergy.org)>; [GSyphers@SonomaCleanPower.org](mailto:GSyphers@SonomaCleanPower.org) <[GSyphers@SonomaCleanPower.org](mailto:GSyphers@SonomaCleanPower.org)>; 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**Subject:** R.17-06-026 (PCIA): Ruling on ERRA-related PCIA issues

Parties to R.17-06-026:

This ruling requests comments in response to the following questions by October 1, 2021 and replies by October 8, 2021.

1. ERRA Data Access. In comments on the December 2020 scoping memo, CalCCA proposed (i) to require all three IOUs to provide the ERRA data that SCE was required to provide in D.20-12-035, and (ii) require IOUs to provide confidential ERRA Monthly Report data to reviewing representatives who have signed NDAs within 5 business days of filing such report with the Commission. Please comment on each sub-part of this proposal from an operational, legal and/or public policy perspective.
2. PCIA Forecasting Data Access. In comments on the December 2020 scoping memo, CalCCA proposed to require the IOUs to provide year-round access to key cost and revenue data, including (1) confidential versions of monthly reports for each month of the year, when they are provided to the Commission, and (2) data and workpapers underlying these reports, at the same level of granularity and on the same schedule as required for future ERRA proceedings. CalCCA proposed to require IOUs provide year-round access to this data through Year-Round NDAs that would allow reviewing representatives to use the data provided in the ERRA Monthly Reports outside the context ERRA Forecast proceedings for the limited purpose of creating PCIA rate forecasts that are based on, but do not disclose, confidential data, and can be shared with CCA decision-makers to allow them to plan for future rate changes.
  - a. Why is it in the public interest to make confidential ERRA Monthly Reports data available to CCAs outside of the ERRA proceedings?
  - b. Which types of stakeholders besides CCAs should have access to confidential ERRA Monthly Reports for the purpose of creating PCIA rate forecasts?
  - c. Can a Year-Round NDA reasonably prevent CCAs or other stakeholders from using ERRA Monthly Reports data for non-approved purposes?
  - d. Is there an alternative to CalCCA's proposal that would enable CCAs to create PCIA forecasts year-round?

3. Confidential Data Consistency. In comments on the December 2020 scoping memo, CalCCA proposed that the Commission require consistency across IOUs regarding what information is considered confidential.
  - a. Proponents of this proposal should provide a chart showing which datasets or categories of data should be public and which should be confidential. The chart should indicate the current public/confidential designation of each IOU. The chart should reference the confidentiality matrices adopted in D.06-06-066 (as amended), as applicable.
  - b. What updates to the existing Model NDA would this proposal require?
4. Year-End Balances and Crediting Customers. In comments on the December 2020 scoping memo, the Joint IOUs proposed that the Commission direct the IOUs to transfer ERRA and PUBA/CAPBA year-end balances to the corresponding subaccount of PABA, consistent with ratemaking in SCE's 2020 and 2021 ERRA forecast proceedings, for every year moving forward.
  - a. Please comment on this proposal from an operational, legal and/or public policy perspective.
  - b. Regardless of your response to the question above, please outline any process or tariff changes that would be required to implement this change.
5. ERRA Trigger. The Joint IOUs recommended that the Commission adjust the ERRA trigger mechanisms to consider PABA balances, which may "cancel out" undercollections in ERRA and reduce the frequency of expedited ERRA trigger applications. CalCCA requested more details from the Joint IOUs in reply comments.
  - a. SCE and PG&E have already included PABA balances in their ERRA Preliminary Statements without Commission approval. Should the Commission sanction or penalize SCE and PG&E for acting without Commission approval?
  - b. Please comment on this proposal from an operational, legal and/or public policy perspective.

The Commission's docket office shall file this ruling.

**Stephanie Wang** (she)  
Administrative Law Judge  
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