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

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| Order Instituting Rulemaking to Continue the Development of Rates and Infrastructure for Vehicle Electrification. | Rulemaking 18-12-006 (Filed Dec. 13, 2018) |

# AMENDED REPLY COMMENTS OF THE JOINT COMMUNITY CHOICE AGGREGATORS ON ENERGY DIVISION STAFF PROPOSAL TO ESTABLISH TRANSPORTATION ELECTRIFICATION FUNDING CYCLES AND STATEWIDE BEHIND-THE-METER PROGRAM

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*On behalf of Joint Community Choice Aggregators*

May 16, 2022

## TABLE OF CONTENTS

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

| | |
|---|---|
| Order Instituting Rulemaking to Continue the Development of Rates and Infrastructure for Vehicle Electrification. | Rulemaking 18-12-006 (Filed Dec. 13, 2018) |

**AMENDED REPLY COMMENTS OF THE JOINT COMMUNITY CHOICE AGGREGATORS ON ENERGY DIVISION STAFF PROPOSAL TO ESTABLISH TRANSPORTATION ELECTRIFICATION FUNDING CYCLES AND STATEWIDE BEHIND-THE-METER PROGRAM**

Pursuant to the updated procedural schedule established in the February 25, 2022 Assigned Commissioner's Ruling Adding Staff Proposal to the Record and Inviting Party Comments (ACR), the March 21, 2022 email Ruling of Administrative Law Judge Goldberg and Administrative Law Judge Brian Korpics' July 1, 2022 Email Ruling Granting Motion of Joint Community Choice Aggregators to Amend Comments, the Joint Community Choice Aggregators[1] (Joint CCAs) hereby file an amended reply to opening comments on the Energy Division Staff Proposal to Establish Transportation Electrification Funding Cycles and Statewide Behind-the-Meter Program (Staff Proposal).

## I. INTRODUCTION

In Opening Comments, the Joint CCAs explained the limitations of a statewide rebate-only transportation electrification (TE) program and laid out a proposal for a modified Funding Cycle 1 (FC1) structure. That modified structure would allow CCAs the flexibility to design and allocate

[1] The Joint CCAs consist of California Choice Energy Authority (CalChoice), Clean Power Alliance of Southern California (CPA), East Bay Community Energy Authority (EBCE), Marin Clean Energy (MCE), Peninsula Clean Energy Authority (PCEA), Redwood Coast Energy Authority (RCEA), San Diego Community Power (SDCP), San José Clean Energy (SJCE), and Sonoma Clean Power Authority (SCP). SJCE is the City of San José's CCA program, which the San José Community Energy Department administers.

TE incentives in a manner that reflects the particular needs and constraints of underserved communities and critical sectors in their service areas. It would also allow CCAs to provide marketing, education and outreach (ME&O) and technical assistance (TA) to all customers in their service areas. The Joint CCAs' proposed modifications to the FC1 structure will help ensure that the benefits of TE infrastructure deployment through the statewide program accrue in an equitable manner to underserved communities and critical sectors.

In opening comments, the Alliance for Automotive Innovation (Auto Innovators)—which represents the manufacturers producing nearly 99 percent of cars and light duty trucks sold in the country[2]—recommended that **CCAs should be a part of a "full court press" to design and execute more effective ME&O strategies**. Green Power Institute (GPI) recommended that CCAs should take the lead on ME&O development and implementation in their service areas and receive funding proportionate to their population share in order to do so.[3] In a similar vein, Pacific Gas and Electric Company (PG&E) also noted the value of leaning on CCAs to provide effective ME&O.[4] GRID Alternatives recommended that CCAs be permitted the flexibility to tailor, differentiate and incrementally incentivize elements of the statewide program most relevant to their service territories.[5] These comments strengthen the case for the modified FC1 structure that the Joint CCAs proposed in opening comments.

Several commenters, however, support the delegation of TA administration to the investor-owned utilities (IOUs). As detailed in opening comments, the Joint CCAs do not support the *exclusive* administration of TA by the IOUs because the CCAs have demonstrated that they are equipped to effectively provide TA in their service areas. In these reply comments, the Joint CCAs

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[2] Auto Innovators Opening Comments at 2.
[3] GPI Opening Comments at 11.
[4] PG&E Opening Comments, Attachment 1 at 6.
[5] GRID Alternatives Opening Comments at 5.

reiterate that the CCAs already provide critical TA in support of TE infrastructure deployment and re-emphasize that the Commission should allow CCAs to administer TA to all customers in their service areas as a part of the statewide program.

Finally, the Joint CCAs address below opening comments regarding the source of funding for the statewide program and ratepayer affordability issues and explain why it is appropriate for the statewide program to receive ratepayer funding.

## II. REPLY COMMENTS

### A. Parties correctly observe that a rebate-only structure for Funding Cycle 1 (FC1) does not provide the flexibility necessary to meet the diverse needs of underserved communities.

**Response to Section 5.3.2 "Questions – Rebate Program" in Staff Proposal**:

Several commenters express concerns that the incentive structure described in the Staff Proposal—involving traditional rebates allocated strictly between light-duty charging (LD-charging) at multi-unit dwellings (MUDs) and medium-duty heavy-duty (MDHD) charging—does not provide the flexibility necessary to meet the state's TE goals and the diverse needs of underserved communities. Environmental Defense Fund (EDF) comments that direct customer rebates should not be the exclusive incentive type made available through the statewide programs since those rebates can be administratively burdensome and costly, and encourages the Commission to instead develop a suite of market transformation programs that include downstream, midstream and upstream incentives.[6] The Greenlining Institute emphasizes the importance of designing incentives as "point of sale rebates" in order to benefit customers who cannot front the costs of installation and wait for reimbursement.[7] Similarly, the Center for Community Action and Environmental Justice, East Yard Communities for Environmental Justice,

[6] EDF Opening Comments at 5.
[7] The Greenlining Institute Opening Comments at 3.

Sierra Club and Union of Concerned Scientists (Joint Commenters) criticize rebate-only utility charging programs in other states and recommend that rebates for MUDs be offered at the point-of-sale.[8] PG&E also notes that rebates require upfront investment that can be prohibitive to small customers or other customers that lack access to capital.[9]

GRID Alternatives correctly observes that many low-income Californians still reside in single-family properties and therefore asserts that FC1 could better expand EVSE access to low-income Californians by allowing low-income households who reside in single-family homes to be eligible for incentives.[10] GRID therefore supports flexibility with respect to rebate design and states that rebate levels should be determined based on "the financial ability of prospective EV drivers to access the technology the rebate is intended to incentivize."[11] To that end, GRID Alternatives recommends that the program administrator have the "flexibility to determine and quickly implement a higher rebate level" depending on the adoption and performance of the program.[12] Further, GRID Alternatives specifically recommends that CCAs be permitted the flexibility to tailor, differentiate, and incrementally incentivize elements of the BTM program in their service areas.[13]

These comments echo the Joint CCAs' concerns with the rebate-only structure in the Staff Proposal and validate the importance of a flexible, tailored and equity-focused approach to incentive design.[14] As the Joint CCAs pointed out in opening comments, "a narrow focus on fixed rebates to the exclusion of other incentive types would favor customers that have the resources to

[8] Joint Commenters Opening Comments at 8.
[9] PG&E Opening Comments at 6-7.
[10] GRID Alternatives Opening Comments at 5-7.
[11] *Id*. at 3.
[12] *Id*. at 4.
[13] *Id*. at 5.
[14] Joint CCA Opening Comments at 4.

outlay upfront capital and disfavor low-income customers who may lack those resources."[15] The Joint CCAs therefore recommend that the proposed FC1 statewide program allow greater flexibility with respect to the design of incentives, including incentives that are more appropriate for customers without access to upfront capital—such as midstream/upstream incentives, point of sale rebates, fully paid programs and grants.[16] The Joint CCAs further emphasize that the optimal mix of incentives varies by geography and customer characteristics.[17] The Joint CCAs' modified FC1 structure reflects and accounts for this variability by allowing CCAs the flexibility to design (and allocate) incentives that are reasonably accessible to underserved communities in their service areas, consistent with GRID Alternatives' recommendation.

### B. Multiple commenters correctly observe that CCAs are well-positioned to administer ME&O in their service areas for FC1 incentives.

**Response to "Section 5.5.1 Questions – ME&O" in Staff Proposal:**

Several Parties observed that CCAs have a strong understanding of customers in their service areas and therefore are well-equipped to provide effective ME&O services in support of the statewide program. The Auto Innovators urged that given the existing lines of communication between CCAs and their customers, the CCAs should be a part of a "full court press" to design and execute more effective ME&O strategies.[18] The Auto Innovators emphasized that leaning on CCAs is consistent with one of the group's core guiding principles, which is to "[a]ccelerate the pace of infrastructure deployment through public-private partnerships and collaboration across government entities, industries, and stakeholder groups."[19] GPI notes that CCAs are already funding EV programming through their generation charges and are more aware of local outreach

[15] *Id*.
[16] *Id*.
[17] *Id*. at 10.
[18] Auto Innovators Opening Comments at 20.
[19] *Id*. at 4.

methods than IOUs.[20] In light of the CCAs' experience with EV programs and relationships with their customers, GPI recommends that CCAs take the lead on ME&O implementation for the statewide program in their service areas. To that end, GPI urges that CCAs receive 100% of the ME&O budget (proportionate to population share) for their service areas, if the CCA agrees to accept that funding.[21] PG&E also acknowledges the value of incorporating CCAs into development and implementation of the statewide program so that CCAs can leverage their customer relationships to provide efficient and effective ME&O.[22]

These comments directly support the Joint CCAs' modified FC1 proposal, which would allow CCAs to directly administer ME&O funds for their service areas.[23] As the Joint CCAs explained in opening comments, CCAs already provide successful ME&O services tailored to reach underserved communities in support of TE programs and are therefore particularly well-suited to administering ME&O in their services.[24]

EDF, however, makes the point that not all customers are served by a CCA and not all CCAs are located in pollution burdened communities.[25] Therefore, EDF points out, it is important that the statewide administrator work with community-based and local organizations to develop marketing and outreach plans.[26] EDF states:

> "If the Commission is serious about ensuring these programs are equitable, local and community-based organizations need to be part of the ME&O design and implementation – and the administrator needs to ensure that there is a process for engaging these groups and integrating their ideas and recommendations, as well as ensuring

[20] GPI Opening Comments at 11.
[21] *Id*.
[22] PG&E Opening Comments, Attachment 1 at 6.
[23] Joint CCA Opening Comments at 16.
[24] *Id*. at 11.
[25] EDF Opening Comments at 8.
[26] *Id*.

> there is space to make changes based on their feedback and that they are responsible for running ME&O programs where appropriate."[27]

The Joint CCAs agree. While the Joint CCAs did not specifically prescribe the role that non-CCA third parties (such as community-based and local organizations) could or should play in the modified FC1 structure that the Joint CCAs propose, the Joint CCAs agree that those organizations may be well-equipped to tailor incentives to local needs, and, in some cases, may be well-equipped to provide ME&O and TA.[28]

The Joint CCAs note, however, that CCAs and community-based and local organizations need not (and do not) play mutually exclusive roles in TE program implementation including ME&O design and delivery. CCAs already work closely with community-based and local organizations in the implementation of existing TE programs. As described in the Joint CCAs' opening comments, Peninsula Clean Energy, for instance, worked with Peninsula Family Service—a local social services organization—to offer a rebate of up to $4,000 on used EVs to residents with low-to-moderate incomes, as well as vehicle loans and financial education to help applicants.[29] The City of San José also partnered with Peninsula Family Service to provide financial education and EV assistance to low-and-moderate-income residents in San José.[30] The Joint CCAs are open to party comments regarding how community-based and local organizations can be best incorporated into ME&O design, delivery and administration under the modified FC1 structure that the Joint CCAs propose.

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[27] *Id*.
[28] The Joint CCAs note that any entity administering or otherwise providing TA should have the necessary capabilities including the minimum services listed in the Staff Proposal. *See* Staff Proposal at 17.
[29] Joint CCA Opening Comments at 15.
[30] *Id*.

### C. Local customization of FC1 incentives is essential to distributing such funding in an equitable manner and the Joint CCAs' proposal addresses this concern.

**Response to "Section 5.6.1 Questions – Underserved Communities" in Staff Proposal:**

While the Joint CCAs support higher rebates for projects located in underserved communities, the Joint CCAs maintain that an equity carveout and higher rebates are not sufficient to ensure that underserved communities benefit from TE infrastructure. Certain commenters—while cautiously supportive of the Staff Proposal to provide higher rebates based on project siting—agree that this approach is not sufficient to ensure that the benefits of the statewide program accrue to underserved communities.

For example, the Center for Sustainable Energy (CSE) recommends that the Commission authorize higher rebates for customers whose vehicles are not only domiciled in disadvantaged communities (DAC), but whose vehicles also spend a significant amount of time operating within DACs.[31] The Greenlining Institute recommends the use of additional criteria, including housing type, to ensure that higher incentives actually go to residents affected by higher proportions of pollution and poverty.[32] The Utility Reform Network (TURN) notes that offering higher incentives for sites located in underserved communities might in some cases actually be inequitable depending on the ownership of the charging locations. TURN explains that sites located in DACs "may not actually cater primarily or at all to low-income residents, nor be themselves 'disadvantaged,'" as in the case of MUDs owned by large financial entities or corporations.[33] TURN therefore recommends that higher rebates be reserved for MUDs in which a majority of residents have incomes at or below 80% of the area median income.[34] TURN does not support

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[31] CSE Opening Comments at 7.
[32] The Greenlining Institute Opening Comments at 2-3.
[33] TURN Opening Comments at 13.
[34] *Id*.

higher rebates for MDHD customers because it "is not aware of evidence that demonstrates why MDHD customers – likely large fleets, including medium- and large-sized corporations – located in DACs require additional subsidies relative to customers in non-DACs."[35]

These comments suggest a spectrum of potential solutions to the same problem: high rebates will not effectively ensure that underserved communities actually benefit from TE infrastructure deployment. The Joint CCAs believe that an equity carveout and higher incentives for projects in underserved communities can be helpful,[36] but, as explained in opening comments, are insufficient to ensure that the benefits of TE infrastructure actually accrue to underserved communities. In opening comments, the Joint CCAs noted that the geographic criteria defining "underserved community" are broad and would likely capture a significant portion of the state.[37] The Joint CCAs also noted significant regional differences with respect to MUD and MDHD characteristics and explained that addressing that variation in an equitable manner would require more than just increased rebates.[38] The Joint CCAs' modified FC1 structure would better meet the needs of underserved communities by emphasizing regional/local customization of incentives and regional/local delivery of ME&O and TA.[39] Put simply, "[a]n equitable program design intentionally accounts for community needs."[40]

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[35] *Id*. at 14.
[36] Joint CCA Opening Comments at 8.
[37] *Id*.
[38] *Id*. at 10-11.
[39] *Id*. at 9-10.
[40] *Id*. at 9.

### D. IOUs should not have exclusive responsibility for Technical Assistance (TA) with FC1 incentives.

**Response to "Section 5.4.1 Questions – Technical Assistance" in Staff Proposal:**

Several commenters support the assignment of TA responsibilities to the IOUs. This includes the IOUs themselves,[41] but also the Auto Innovators[42] and the Alliance for Transportation Electrification.[43] Those comments ignore that in many cases, CCAs are already effectively providing TA in support of existing TE programs. In fact, in some cases, the CCAs' TA effectively supports and fills a gap in the IOUs' TE programs.

For instance, through its EV Fleet Program, PG&E will construct and own electrical infrastructure from the transformer to the meter (and in some instances the behind the meter infrastructure), and fleet operators will design, build, own, operate and maintain the electrical infrastructure from the customer meter to the EV charger.[44] PG&E's EV Fleet Program will not, however, provide TA to fleet operators. Peninsula Clean Energy's Public Fleets program will fill a gap in PG&E's EV Fleet Program by providing custom TA support for fleet managers in the form of project design and planning, grant application assistance, bid development assistance, construction management, and EV charging station setup and energy management, in addition to targeted gap-funding assistance—thereby likely helping those fleet managers participate in PG&E's EV Fleet Program.

Moreover, having the IOUs be the exclusive TA administrators for FC1 incentives may raise anti-competitive concerns. That is because, per the Staff Proposal, the TA function involves

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[41] *See* PG&E Opening Comments Attachment 1 at 4; SCE Opening Comments at 19; SDG&E Opening Comments at 10.
[42] Auto Innovators Opening Comments at 19-20.
[43] Alliance for Transportation Electrification Opening Comments at 8.
[44] Pacific Gas and Electric Company, EV Fleet Program, available at: https://www.pge.com/en_US/large-business/solar-and-vehicles/clean-vehicles/ev-fleet-program/ev-fleet-program.page.

helping customers choose between rate options.[45] In the CCAs' service areas, those rates include the CCAs' generation rates. Per the Code of Conduct governing the treatment of CCAs by utilities adopted in D.12-12-036, utilities must refrain from speaking on behalf of a CCA program; giving any appearance of speaking on behalf of any CCA program; or making any statement related to the CCAs' rates that is untrue or misleading.[46] Utilities are prohibited from communicating with customers regarding CCAs' energy supply services and rates unless providing a factual answer in response to a customer question or unless the communication is pursuant to a Commission-authorized program.[47] Utilities are also barred from discriminating between bundled and CCA customers in matters relating to any product or service that is subject to a tariff on file with the Commission, and may not condition or tie the provision of any product, service or rate agreement to a customer's participation or non-participation in a CCA program.[48]

The Joint CCAs' proposal—which would allow CCAs to directly administer TA for customers in their service areas—would help ensure that TA delivered in support of the statewide program avoids running afoul of the Code of Conduct. As IOUs are constrained in their ability to discuss CCA rates and services with customers, placing TA exclusively within the domain of the IOUs would limit the TA services. Limiting the provision of TA to IOUs would also create inefficiency as CCAs would have to share and facilitate CCA rate and program information applicable to TE programs, including tracking and ensuring that factual rate information is being provided to customers. Direct provision of TA by CCAs resolves some of this friction.

The CCAs should therefore be permitted to administer TA for customers in their service areas to ensure that their customers can access the full range of TA services as part of the BTM

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[45] Staff Proposal at 17.
[46] R.12-02-009, Code of Conduct, D.12-12-036, A1-5 (Rule of Conduct 8.1(9)).
[47] *Id*. (Rule of Conduct 8.1(1)(a)).
[48] *Id*. at A1-8 (Rule of Conduct 8.1(18)).

program. MDHD and MUD participants should be presented with the most specific data available in calculating the costs of operating the new EV service equipment, and this calculation requires the tools of applicable generation rates. CCAs that elect to serve as a TA administrator for their service area are well-suited to provide rate comparisons for customers using actual CCA rates and customer usage information.

Finally, the Joint CCAs respond to the National Diversity Coalition's (NDC) suggestion that an EV service provider (EVSP) administer the entire statewide FC1 program, including the TA component.[49] NDC asserts that "EVSPs . . . have a much higher incentive to provide a good customer experience, to build their brand and attract and retain customers."[50] While that may or may not be true, the Joint CCAs do not support this recommendation. Any EVSP would be an interested actor and therefore would not be in a position to fairly administer incentives. Granting such authority to a private company would compromise the competitive neutrality of the Commission. The Commission should not adopt NDC's recommendation.

### E. The Joint CCAs support ratepayer funding for the statewide FC1 incentive program.

**Response to "Section 5.2.1 Questions – Budget" in Staff Proposal:**

In opening comments, PG&E recommends that FC1 be funded and administered by a state agency rather than by the IOUs.[51] SCE makes a similar recommendation, suggesting an alternative which would transition the statewide rebate program from ratepayer funding to a state budget-funded program. SCE specifically suggests that the California Energy Commission (CEC) or the California Air Resources Board (CARB) could administer the statewide program "if the legislature

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[49] NDC Opening Comments at 13.
[50] *Id.*
[51] PG&E Opening Comments at 1-2.

allocated a portion of state's general fund to support it."[52] SDG&E appears to support ratepayer funded TE incentives, but also suggests that the Commission consider non-ratepayer funding sources to support the FC1 rebate program, including the state's general fund.[53] The Public Advocates Office (PAO) recommends that the Commission evaluate the ability of the EV market to attain the state's electrification goals with private funding and existing public and ratepayer programs, and "only authorize additional ratepayer funding as a last resort."[54] Other commenters also suggested that the Commission limit ratepayer funding for the statewide program or otherwise transition the program to state-funding.[55]

The Joint CCAs acknowledge and share these parties' concerns about ratepayer affordability. The Joint CCAs' proposed modifications to the FC1 structure to customize and allocate incentives on a local basis through an equity lens are intended to ensure that the substantial and critical investments in TE infrastructure contemplated by the Staff Proposal *directly benefit* low-income, disadvantaged and underserved communities. In light of concerns with respect to ratepayer affordability, the Joint CCAs posit that any ratepayer funding to be deployed in FC1 should be used as efficiently as possible in order to control ratepayer impacts.

The Joint CCAs acknowledge that in order to meet California's TE goals during FC1, additional funding (beyond what is approved for FC1 budget proposed in the Staff Proposal) may be required, including funding through the state budget and federal funding sources.[56] The Joint

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[52] SCE Opening Comments at 7.
[53] SDG&E Opening Comments at 5.
[54] PAO Opening Comments at 5-6.
[55] *See* Energy Producers and Users Coalition Opening Comments at 1-2; NDC Opening Comments at 5; Utility Consumers' Action Network Opening Comments at 5.
[56] The ACR notes the significant federal and state funding that has been approved to build out California's TE infrastructure since the release of the draft Transportation Electrification Framework (TEF). That includes $383 million through the federal Infrastructure Investment and Jobs Act and $1.4 billion for TE and hydrogen vehicle charging infrastructure approved by the CEC. Assigned Commissioner Ruling at 6.

CCAs do not, however, support a transition away from ratepayer-funding for the statewide program. SB 350, which required the utilities to develop TE programs, signaled the state's clear and continuing support for ratepayer-funded investments to meet California's ambitious TE goals.[57] The Commission should approve ratepayer funding for the proposed FC1 statewide incentive program.

The Joint CCAs note that previously-approved ratepayer funding sources for TE programs did not expressly permit CCAs to administer TE programs. This was a serious limitation, as described in the Joint CCAs' earlier comments in this docket.[58] If the Commission does not approve the Staff Proposal to deploy new ratepayer funding for FC1, it should authorize CCAs to directly administer TE programs for the many reasons previously discussed by the CCAs in this docket.[59]

## III. CONCLUSION

The Joint CCAs thank Assigned Commissioner Rechtschaffen for the opportunity to submit reply comments. For the reasons explained in the Joint CCAs' opening and reply comments, the Joint CCAs continue to recommend the following specific changes to the Staff Proposal:

- Allow CCAs to apply via advice letter to apportion a percentage of the statewide budget towards locally customized incentive programs;

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[57] Senate Bill 350 (de León, Ch. 547, 2015) (adding Cal. Pub. Util. Code § 740.12(b)).
[58] Comments of Peninsula Clean Energy Authority on Sections 9, 10 and 12 of the Draft Transportation Electrification Framework at 15 (Sept. 11, 2020); Reply Comments of Peninsula Clean Energy Authority on Sections 9, 10 and 12 of the Draft Transportation Electrification Framework at 6-10 (Sept. 25, 2020); *see generally* Opening Comments of the Joint Community Choice Aggregators on Section 10 of the Energy Division Staff Proposal for a Transportation Electrification Framework (Sept. 11, 2020); Reply Comments of the Joint Community Choice Aggregators on Section 10 of the Energy Division Staff Proposal for a Transportation Electrification Framework (Sept. 25, 2020); Opening Comments of the Joint CCAs on Proposed Decision Setting Near-Term Priorities for Transportation Electrification Investments by the Electrical Corporations (June 21, 2021).
[59] *Id*.

- Allow CCAs to design and allocate incentives within their apportioned budget to address the needs of underserved communities and critical sectors;

- Allow CCAs to administer ME&O in their service areas;

- Allow CCAs to administer TA in their service areas;

- Authorize a streamlined process by which FC1 funding approved via CCA advice letter is remitted to CCAs by the distribution utility in quarterly installments; and

- Expressly list "TA to underserved communities" as one of the services included under Technical Assistance.

Respectfully submitted,

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