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July 28, 2017

California Energy Commission
Docket Unit, MS-4

Re: Docket No. 16-OIR-05
1516 Ninth Street
Sacramento, CA 95814-5512

CalCCA Comments on Assembly Bill 1110 Implementation Draft Proposal for Power Source Disclosure

California Community Choice Association (“CalCCA”) hereby submits its comments on the Draft Staff Paper Assembly Bill 1110 Implementation Proposal for Power Source Disclosure (“Draft Proposal”) filed on June 27, 2017. CalCCA appreciates this opportunity to comment on the Draft Proposal and strongly urges the California Energy Commission (“CEC”) staff to modify the Draft Proposal to ensure that the new regulations do not result in inconsistent state regulations, create customer confusion, or undermine California’s ambitious clean energy policies.

I. Introduction

CalCCA represents the interests of California’s Community Choice Aggregators (“CCAs”) in the legislature and at jurisdictional regulatory agencies, including the CEC. CalCCA’s current operational members include Apple Valley Choice Energy, CleanPowerSF, Lancaster Choice Energy, MCE, Peninsula Clean Energy, Redwood Coast Energy Authority, Silicon Valley Clean Energy, and Sonoma Clean Power.


CalCCA also has several affiliate members that anticipate becoming operational members soon, including Central Coast Power, City of Corona, City of Hermosa Beach, City of San Jacinto, City of San Jose, City of Solana Beach, County of Los Angeles, County of Placer, East Bay Community Energy Authority, Monterey Bay Community Power Authority, Valley Clean Energy, and Western Riverside Council of Governments.

CalCCA’s membership demonstrates the growth of community interests in CCAs across California. Many of CalCCA’s members have developed procurement strategies to exceed the State’s Renewable Portfolio Standard (“RPS”) mandates to reflect local communities’ desire to reduce Greenhouse Gas (“GHG”) emissions. Many operational CCAs offer electricity products that exceed the current RPS standard. The ability to purchase renewable energy is a powerful tool for communities to take actions to replace fossil fuel resources, and it is important that such actions are accounted for properly so that customers are aware of the nature of electricity that is procured on their behalf.


II. Overall Comments

CalCCA appreciates the hard work of the CEC staff in undertaking the implementation of Assembly Bill (“AB”) 1110. In working with the CEC staff,

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