

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

Order Instituting Rulemaking Regarding the)	
Implementation of the Suspension of Direct)	Rulemaking 02-01-011
Access Pursuant to Assembly Bill 1X and)	(Filed January 9, 2002)
Decision 01-09-060.)	

**JOINT UTILITIES' AND COMMUNITY CHOICE AGGREGATORS' JOINT
PETITION FOR MODIFICATION OF D.06-07-030**

FADIA R. KHOURY
RUSSELL A. ARCHER
Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-2865
E-mail: Russell.Archer@sce.com

STEVEN S. SHUPE
GENERAL COUNSEL
Attorney for
SONOMA CLEAN POWER AUTHORITY

50 Santa Rosa Avenue, 5th Floor
Santa Rosa, CA 95404
Telephone: (707) 890-8485
E-mail: sshupe@sonomacleanpower.org

Dated: **April 5, 2017**

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

Order Instituting Rulemaking Regarding the)	
Implementation of the Suspension of Direct)	Rulemaking 02-01-011
Access Pursuant to Assembly Bill 1X and)	(Filed January 9, 2002)
Decision 01-09-060.)	

**JOINT UTILITIES' AND COMMUNITY CHOICE AGGREGATORS' JOINT PETITION FOR
MODIFICATION OF D.06-07-030**

Pursuant to Rule 16.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E) (collectively, the Joint Utilities); and the Sonoma Clean Power Authority (SCP), Peninsula Clean Energy (PCE), Silicon Valley Clean Energy (SVCE), and Marin Clean Energy (MCE) (collectively, the joint Community Choice Aggregators or CCAs), jointly submit this Petition for Modification of Decision (D.) 06-07-030.

I.

BACKGROUND

D.06-07-030 established the Power Charge Indifference Adjustment (PCIA) for departing load customers, and determined various then-outstanding issues relating to ensuring customer “indifference.” Over the ensuing decade, more and more entities providing retail generation service as “Community Choice Aggregators” (CCAs) under AB 117 have become operational, and CCAs will continue to grow rapidly in California. The PCIA has become controversial due (among other reasons) to its volatility, and because under current confidentiality rules-limitations CCA employees can only review inputs into the calculation underlying the charge that do not include market sensitive information, as defined in

California Public Utilities Code section 454.5(g) and subsequent Commission decisions implementing that statute, under the Commission’s approved confidentiality procedures.¹

In D.16-09-044, the Commission ordered SCE and SCP to lead a Working Group to discuss issues surrounding the PCIA, with a focus on attempting to find consensus measures to improve transparency (which includes access to data), and certainty. The Commission directed the parties “to present their recommendations to the commission either as petitions to modify existing decisions or a petition for a rulemaking proceeding within six months of this Decision.”² The Joint Utilities, CCAs, certain Electric Service Providers (ESPs) and other representatives of Direct Access interests, as well as consumer, labor, and environmental groups participated in the PCIA Working Group, which included five in-person meetings in San Francisco, Oakland, San Rafael, and Rosemead. Through this Working Group process, the parties jointly determined that transparency surrounding the PCIA could be improved if the Joint Utilities utilized a common set of “workpapers” for the calculations underlying the PCIA in the Joint Utilities’ respective annual Energy Resource Recovery Account (ERRA) Forecast proceedings. Specifically, over the course of several sessions the Joint Utilities listened to the other parties’ requests for particular data points formatted in a particular way. The parties then collaboratively developed a standardized, user-friendly workpaper template that will more easily facilitate intervening parties’ comparisons and analysis of PCIA calculations across utilities. The parties also “field-tested” the new uniform workpaper template at an in-person Working Group session, and agree that it will facilitate comparability of publicly-available data in respective PCIA calculations. Accordingly, the parties are submitting this limited³ Petition for Modification to add the requirement that the Joint Utilities utilize

¹ The parties respectfully submit that this Petition meets the requirements of Rule 16.4(d) because it could not reasonably have been filed within a year of the original final decision. The first CCA only came into operation in 2010, substantially more than one year after the final decision was issued, and CCAs have only recently begun to serve material amounts of load. In addition, this submission complies with the Commission’s direction in D.16-09-044 to file such a petition within six months of October 5, 2016. *See* D.16-09-044 at Conclusion of Law 8.

² D.16-09-044 at p. 20.

³ Both the Joint Utilities and the CCAs reserve all of their respective rights to advocate for changes and/or a replacement to the PCIA in different forums. To comply with D.16-09-044, the parties are filing this limited petition to improve the PCIA.

the consensus common workpapers template. An example of that template (with illustrative rates) is attached hereto as Exhibit A.

II.

SPECIFIC PROPOSED LANGUAGE CHANGES TO D.06-07-030

In order to implement the proposed common workpapers requirement, the parties respectfully request that the Commission make the following changes to D.06-07-030:

Findings of Fact

28. The parties' proposal to replace the DWR power charge with a PCIA is a reasonable way to preserve the indifference concept. In order to improve the transparency of the calculation underlying the PCIA, the IOUs are directed to use a common PCIA calculation workpaper template in their respective ERRA Forecast proceedings. An example of that template is attached hereto as Appendix 7.

Conclusions of Law

10. On a prospective basis, the PCIA should be updated by each IOU through its annual ERRA filing process. The IOUs shall use the common workpaper template in their respective ERRA Forecast proceedings to demonstrate the calculations underlying the PCIA.

Respectfully submitted,

/s/ Russell A. Archer

By: Russell A. Archer (on behalf of the Joint Utilities and
CCAs pursuant to Rule 1.8(d))

Attorney for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-2865
E-mail: Russell.Archer@sce.com

April 5, 2017

Exhibit A

IOU Total Portfolio Summary

[YEAR] ERRA Forecast - [MONTH] filing

	Pre-2002 CTC-Eligible	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
1. Cost of Portfolio																
2. CRIS Eligible Portfolio Costs (\$000)	419,158	880,048	-	54,708	85,294	72,011	203,301	562,180	284,106	324,573	64,703	291,018	165,483	177,175	970	
3. CRIS Eligible Cumulative Portfolio Costs	419,158	1,299,207	1,299,207	1,353,915	1,439,209	1,511,220	1,714,520	2,276,700	2,560,806	2,885,379	2,950,081	3,241,100	3,406,582	3,583,757	3,584,727	3,584,727
4. CRIS Eligible Supply																
5. CRIS Eligible Supply at Meter (GWh)	6,098	8,408	-	501	1,157	1,314	2,179	4,000	2,738	3,157	724	1,744	1,867	2,619	20	-
6. CRIS Eligible Cumulative GWh at Meter	6,098	14,507	14,507	15,008	16,165	17,478	19,658	23,658	26,396	29,553	30,276	32,020	33,888	36,507	36,527	36,527
7. CRIS Eligible Net Qualifying Capacity																
8. CRIS Eligible Net Qualifying Capacity (MW)	1,056	1,639	-	25	59	-	10	376	252	436	18	3,391	2,156	1,408	27	-
9. CRIS Eligible Cumulative Net Qualifying Capacity	1,056	2,695	2,695	2,720	2,779	2,779	2,790	3,165	3,417	3,853	3,870	7,261	9,417	10,825	10,852	10,852

Indifference Calculation Inputs and Sources

[YEAR] ERRA Forecast - [MONTH] filing

Line No.	Description	Source of Data	Value
1.	On Peak SP 15 Price (\$/MWh)	Platt's on (Date)	
2.	Off Peak SP 15 Price (\$/MWh)	Platt's on (Date)	
3.	On Peak Load Weight (%)	2015 Recorded Load - On Peak Hours	62%
4.	Off Peak Load Weight (%)	2015 Recorded Load - Off Peak Hours	38%
5.	Load Weighted Average Price (\$/MWh)	Line 1 x Line 3 + Line 2 x Line 4	\$33.73
6.	IOU Green Benchmark (\$/MWh)	Energy Division Data (See Below)	\$73.92
7.	IOU RPS Premium (\$/MWh)	Line 6 - Line 5	\$40.19
8.	DOE Renewable Adder (\$/MWh)	Department of Energy Website -- Advice 3484-E	\$16.64
9.	Weighted Average Renewable Premium (\$/MWh)	68% x Line 7 + 32% x Line 8	\$32.65
10.	Weighted Average Renewable Benchmark (\$/MWh)	Line 9 + Line 5	\$66.38
11.	Capacity Benchmark (\$/kW-Year)	2015 CEC Report -- Advice 3484-E	\$58.26
12.	Line Loss Adjustment Factor	Resolution E-4475	1.053
IOU Green Benchmark -- As Calculated by Energy Division			
13.	Total IOU Renewable Resource Cost (\$000)	2017 ERRA Forecast - ED Info Received 10/31/16	\$536,211
14.	Total IOU Renewable Resource Capacity (MW)	2017 ERRA Forecast - ED Info Received 10/31/16	823
15.	Total IOU Renewable Resource Capacity Value (\$000)	Line 14 x \$58.26	\$47,966
16.	Revised IOU Renewable Resource Cost	Line 13 - Line 15	\$488,245
17.	Total IOU Renewable Energy (MWh)	2017 ERRA Forecast - ED Info Received 10/31/16	6,605,179
18.	IOU Green Benchmark (\$/MWh)	Line 16 x 1000 / Line 17	\$73.92

Indifference Amount Calculation

[YEAR] ERRRA Forecast - [MONTH] Filing

Line No.	Description	Unit	2001	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Cost of Portfolio																		
1.	Total Portfolio Cost	\$000	419,158	1,299,207	1,299,207	1,353,915	1,439,209	1,511,220	1,714,520	2,276,700	2,560,806	2,885,379	2,850,081	3,241,100	3,406,582	3,583,757	3,584,727	3,584,727
2.	Supply At Customer Meter	GWh	6,088	14,507	14,507	15,008	16,165	17,478	19,658	23,658	26,386	29,553	30,276	32,020	33,888	36,507	36,527	36,527
3.	Renewable Supply at Customer Meter	GWh	4,304	4,304	4,304	4,806	5,863	7,276	9,455	13,589	16,194	19,350	20,074	20,728	22,595	25,214	25,234	25,234
4.	Average Monthly Net Qualifying Capacity	MW	1,056	2,695	2,695	2,720	2,779	2,779	2,790	3,165	3,417	3,653	3,670	3,761	3,817	4,025	4,025	4,025
5.	Portfolio Unit Cost	\$/MWh	\$68.73	\$95.56	\$95.56	\$90.21	\$89.03	\$86.46	\$67.22	\$96.23	\$97.01	\$97.63	\$97.44	\$101.22	\$100.53	\$98.17	\$98.14	\$98.14
Market Value of Portfolio																		
7.	Market Value of Brown Portfolio																	
8.	Non-Renewable Energy	GWh	1,794	10,202	10,202	10,202	10,202	10,202	10,202	10,089	10,202	10,202	10,202	11,263	11,293	11,293	11,293	11,293
9.	Pratt's Weighted Price (Brown Benchmark)	\$/MWh	33.73	33.73	33.73	33.73	33.73	33.73	33.73	33.73	33.73	33.73	33.73	33.73	33.73	33.73	33.73	33.73
10.	Market Value of Brown Portfolio	\$000	\$60,521	\$344,138	\$344,138	\$344,138	\$344,138	\$344,138	\$344,137	\$340,307	\$344,140	\$344,140	\$344,140	\$380,918	\$380,918	\$380,918	\$380,918	\$380,918
11.	Market Value of Green Portfolio																	
12.	Renewable Energy	GWh	4,304	4,304	4,304	4,806	5,863	7,276	9,455	13,589	16,194	19,350	20,074	20,728	22,595	25,214	25,234	25,234
13.	Weighted Average Green Benchmark	\$/MWh	66.38	66.38	66.38	66.38	66.38	66.38	66.38	66.38	66.38	66.38	66.38	66.38	66.38	66.38	66.38	66.38
14.	Market Value of Green Portfolio	\$000	\$285,733	\$285,733	\$285,733	\$319,016	\$385,811	\$483,008	\$627,680	\$900,774	\$1,075,005	\$1,284,549	\$1,332,587	\$1,376,976	\$1,499,824	\$1,673,795	\$1,675,123	\$1,675,123
15.	Capacity Adder	MW	1,056	2,695	2,695	2,720	2,779	2,779	2,790	3,165	3,417	3,653	3,670	3,761	3,817	4,025	4,025	4,025
16.	Capacity Value	\$/MW-Year	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26
17.	Capacity Value per Resolution E-4475	\$/MW-Year	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26	58.26
18.	Market Value of Capacity	\$000	\$61,554	\$157,030	\$157,030	\$158,471	\$161,925	\$161,925	\$162,525	\$184,405	\$199,081	\$224,458	\$225,487	\$225,487	\$243,042	\$279,672	\$322,226	\$322,226
19.	Portfolio Market Value	\$000	\$407,788	\$786,901	\$786,901	\$821,624	\$901,874	\$989,071	\$1,134,342	\$1,425,487	\$1,618,227	\$1,853,147	\$1,902,214	\$2,179,936	\$2,429,494	\$2,685,385	\$2,688,266	\$2,688,266
20.	Line Less Adjusted Portfolio Market Value	\$000	429,401	826,807	826,807	865,171	949,873	1,041,691	1,194,462	1,501,037	1,703,983	1,951,364	2,003,032	2,295,472	2,596,257	2,827,710	2,830,744	2,830,744
21.	Indifference Amount																	
22.	Portfolio Total Cost	\$000	419,158	1,299,207	1,299,207	1,353,915	1,439,209	1,511,220	1,714,520	2,276,700	2,560,806	2,885,379	2,850,081	3,241,100	3,406,582	3,583,757	3,584,727	3,584,727
23.	Portfolio Unit Value	\$000	429,401	826,807	826,807	865,171	949,873	1,041,691	1,194,462	1,501,037	1,703,983	1,951,364	2,003,032	2,295,472	2,596,257	2,827,710	2,830,744	2,830,744
24.	Total Indifference Amount (Unadjusted)	\$000	(10,243)	\$470,600	\$470,600	\$488,744	\$489,536	\$469,728	\$520,058	\$775,663	\$896,813	\$934,014	\$947,049	\$945,627	\$848,325	\$756,047	\$753,983	\$753,983
25.	DWR Revenue Requirement	\$000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26.	One-Time Adjustments (if applicable)	\$000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27.	Carry Over Negative Indifference (if applicable)	\$000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28.	Adjusted Indifference Amounts	\$000	(10,243)	\$470,600	\$470,600	\$488,744	\$489,536	\$469,728	\$520,058	\$775,663	\$896,813	\$934,014	\$947,049	\$945,627	\$848,325	\$756,047	\$753,983	\$753,983

ERRA CRS Rates

[YEAR] ERRA Forecast - [MONTH] filing

Rate Group	DWRBC (All Vintages)	CTC (For All Vintages)	2001	2004	2009	2010	2011	2012	2013	2014	2015	2016	2017	Proposed Class Average Bundled Generation
Domestic	0.00549	(0.00016)	0.00750	0.00750	0.00750	0.00778	0.00779	0.00748	0.00827	0.01225	0.01352	0.01472	0.01492	0.07491
GS-1	0.00549	(0.00013)	0.00613	0.00613	0.00613	0.00637	0.00638	0.00612	0.00677	0.01003	0.01106	0.01205	0.01221	0.07413
TC-1	0.00549	(0.00007)	0.00336	0.00336	0.00336	0.00349	0.00349	0.00336	0.00371	0.00550	0.00606	0.00660	0.00669	0.05658
GS-2	0.00549	(0.00012)	0.00570	0.00570	0.00570	0.00591	0.00592	0.00569	0.00628	0.00931	0.01027	0.01118	0.01134	0.06717
TOU-GS-3	0.00549	(0.00011)	0.00506	0.00506	0.00506	0.00525	0.00526	0.00505	0.00558	0.00827	0.00912	0.00993	0.01007	0.06318
TOU-8-Sec	0.00549	(0.00009)	0.00441	0.00441	0.00441	0.00458	0.00458	0.00440	0.00486	0.00721	0.00795	0.00866	0.00878	0.05886
TOU-8-Pri	0.00549	(0.00008)	0.00381	0.00381	0.00381	0.00396	0.00396	0.00381	0.00421	0.00623	0.00688	0.00749	0.00759	0.05524
TOU-8-Sub	0.00549	(0.00007)	0.00327	0.00327	0.00327	0.00339	0.00340	0.00327	0.00361	0.00535	0.00590	0.00642	0.00651	0.05041
Small AG	0.00549	(0.00011)	0.00515	0.00515	0.00515	0.00534	0.00535	0.00514	0.00568	0.00841	0.00928	0.01011	0.01025	0.05941
Large AG	0.00549	(0.00008)	0.00385	0.00385	0.00385	0.00400	0.00400	0.00384	0.00425	0.00630	0.00695	0.00756	0.00767	0.05043
St. Lighting	0.00549	-	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.00001	0.03917
Standby - Sec	0.00549	(0.00008)	0.00390	0.00390	0.00390	0.00404	0.00405	0.00389	0.00430	0.00637	0.00703	0.00765	0.00776	0.05917
Standby - Pri	0.00549	(0.00011)	0.00520	0.00520	0.00520	0.00540	0.00540	0.00519	0.00573	0.00850	0.00937	0.01021	0.01035	0.05612
Standby - Sub	0.00549	(0.00006)	0.00287	0.00287	0.00287	0.00298	0.00298	0.00287	0.00317	0.00469	0.00518	0.00564	0.00572	0.04891

Unbundled Rate Components

[YEAR] ERRRA Forecast - [MONTH] filing

Rate Schedule By	Customer Group	Transmission (\$M)	Distribution (\$M)	NSGC (\$M)	NDC (\$M)	PPPC (\$M)	DWRBC (\$M)	PURCF (\$M)	UG (\$M)	DWREC (\$M)	Total Delivery (\$M)	Total Generation (\$M)	Total (\$M)
Domestic		0.01509	0.08844	0.01032	(0.00089)	0.01718	0.00539	0.00034	0.07514	(0.00023)	0.13587	0.07491	0.21078
GS-1		0.01390	0.06624	0.00965	(0.00089)	0.00771	0.00539	0.00033	0.07435	(0.00022)	0.10233	0.07413	0.17646
TC-1		0.00847	0.09988	0.00642	(0.00089)	0.00852	0.00539	0.00033	0.05680	(0.00022)	0.12812	0.05658	0.18470
GS-2		0.01391	0.06849	0.00906	(0.00089)	0.00717	0.00539	0.00033	0.06739	(0.00022)	0.10346	0.06717	0.17063
TOU-GS-3		0.01283	0.05612	0.00865	(0.00089)	0.00656	0.00539	0.00033	0.06340	(0.00022)	0.08899	0.06318	0.15217
TOU-8-Sec		0.01140	0.04657	0.00788	(0.00089)	0.00608	0.00539	0.00033	0.05909	(0.00022)	0.07676	0.05886	0.13562
TOU-8-Pri		0.01039	0.04007	0.00708	(0.00089)	0.00553	0.00539	0.00033	0.05546	(0.00022)	0.06790	0.05524	0.12314
TOU-8-Sub		0.00861	0.00829	0.00584	(0.00089)	0.00391	0.00539	0.00033	0.05063	(0.00022)	0.03148	0.05041	0.08189
TOU-PA-2		0.00846	0.04942	0.00605	(0.00089)	0.00594	0.00539	0.00033	0.05963	(0.00022)	0.07471	0.05941	0.13412
TOU-PA-3		0.00854	0.04248	0.00548	(0.00089)	0.00504	0.00539	0.00033	0.05065	(0.00022)	0.06637	0.05043	0.11680
Street Lighting Average		0.00692	0.11332	0.00505	(0.00089)	0.00878	0.00539	0.00033	0.03839	(0.00022)	0.13890	0.03917	0.17807
TOU-8-S-S		0.01179	0.04616	0.00771	(0.00089)	0.00602	0.00539	0.00033	0.05939	(0.00022)	0.07651	0.05917	0.13568
TOU-8-S-P		0.01111	0.04646	0.00676	(0.00089)	0.00591	0.00539	0.00033	0.05634	(0.00022)	0.07507	0.05612	0.13118
TOU-8-S-T		0.00822	0.00786	0.00511	(0.00089)	0.00397	0.00539	0.00033	0.04913	(0.00022)	0.02999	0.04891	0.07890

Class Average rates include adjustment for NEM sales