

DOCKETED

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On Title 20 Data Collection Workshop

Additional submitted attachment is included below.

BEFORE THE CALIFORNIA ENERGY COMMISSION

In the Matter of:

*Developing Regulations, Guidelines, and
Policies for Implementing SB 350 and AB 802*

Docket No. 16-OIR-03

**RE: Title 20 Data Collection Regulations to
Support New Analytical Needs**

**COMMENTS OF THE CITY OF LANCASTER ON STAFF WORKSHOP FOR
TITLE 20 DATA COLLECTION REGULATIONS**

The City of Lancaster (“Lancaster”), a California municipal corporation and charter city, operating its Community Choice Aggregation (“CCA”) program by and through an enterprise division of the city (“Lancaster Choice Energy” or “LCE”), hereby provides the following comments on the California Energy Commission’s (“Commission”) September 16, 2016 workshop on Title 20 Data Collection Regulations and the related Title 20 working draft circulated by Commission staff.

A. The Commission Should Maintain Existing Load Metering Report Requirements

The working draft’s proposed Section 1344(a) would drop an eligible Load Serving Entity’s (“LSE”) peak electricity demand requirement below 200 MW (“Megawatts”) to 50 MW. As proposed, smaller LSEs which normally do not meet the current 200 MW threshold requirement will now have to collect and provide hourly load data and analysis along with load metering information. The proposed change to the peak electricity demand requirement would place an additional burden on smaller LSEs that likely have more limited administrative resources. The Commission should review the rationale for the existing 200 MW requirement, examine the potential for existing data (such as data provided in the Resource Adequacy context) to satisfy the information requirements provided in the working draft, and encourage further evaluation of the impact of any proposed requirements on smaller LSEs.

B. The Definition of Community Choice Aggregator Should Be Refined

Under the working draft's proposed Section 1302(b)(58), the definition of a "community choice aggregator" includes organizers within a utility. The Commission should refine this definition to be more consistent with the statutory language concerning community choice aggregators, including Cal. Pub. Util. Code § 331.1(a)-(c). Lancaster suggests the following revisions to the definition of community choice aggregator:

"Community Choice Aggregator" means any statutorily authorized entity that combines community loads into a communitywide buyers' program.~~group of customers within a utility who have organized to secure alternative energy supply contracts on a community wide basis.~~¹

Refining the definition would not only keep the Title 20 regulations consistent with statutory language, but would also prevent unnecessary confusion and discrepancies on requirements imposed by the Commission on different legal entities.

C. Title 20 Data Collection Should Remain Collaborative

Given the substantial amount of new data collection requirements proposed within the working draft, the working draft's Section 1353 process for missing information is likely not the best approach to ensure data is shared in a collaborative manner. The Commission should review existing data collection efforts and discern whether any alternate methods (such as additional listserv notices or standardized submission templates) can streamline existing Title 20 data collection efforts.

Sincerely,

/s/ Camille Stough

Camille Stough

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¹ Underlines signify additions and strikethroughs signify deletions.