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**STATE OF CALIFORNIA ENERGY RESOURCES
CONSERVATION AND DEVELOPMENT COMMISSION**

In the Matter of:

Energy System Reliability

Docket No. 21-ESR-01

RE: Draft Clean Energy Reliability Investment
Plan (CERIP)

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS
ON THE DRAFT CLEAN ENERGY RELIABILITY INVESTMENT PLAN (CERIP)**

Evelyn Kahl,
General Counsel and Director of Policy
Lauren Carr,
Senior Market Policy Analyst
CALIFORNIA COMMUNITY CHOICE
ASSOCIATION
One Concord Center
2300 Clayton Road, Suite 1150
Concord, CA 94520
(510) 980-9459
regulatory@cal-cca.org

February 16, 2023

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I. INTRODUCTION

The California Community Choice Association¹ (CalCCA) submits these Comments on the *Draft Clean Energy Reliability Investment Plan* (Plan). CalCCA applauds the California Energy Commission (Commission) for its efforts in advancing clean energy investments that accelerate the deployment of clean energy resources, support demand response, assist ratepayers, and increase energy reliability, as directed in Senate Bill 846. These comments focus on the Central Procurement Mechanism (CPM) described in the Plan.

II. THE COMMISSION SHOULD KEEP IN MIND THE MULTIPLE OPTIONS AVAILABLE FOR STRUCTURING A CPM

The Plan lists standing up a CPM as one of the Commission’s focus areas for the first year of the Plan’s funding. The Plan indicates that the Commission will use resources focused on

¹ California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, East Bay Community Energy, Energy For Palmdale’s Independent Choice, Lancaster Choice Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

this effort to develop a strategy for “how the entity will operate” in order to lead the development of long lead time resources and to “support [the California Department of Water Resources] DWR to standup a CPM.”²

The Commission must keep in mind when developing a CPM that there are multiple ways to achieve centralized procurement. That is, it may not be necessary to have a single entity responsible for conducting all the central procurement. If other load-serving entities (LSEs) are willing to commit to procure on behalf of all LSEs, the CPM design should allow for them to do so subject to uniform regulatory oversight and cost allocation. As the Commission begins to develop a CPM framework, it should not put unnecessary limits on the scope of the entities that can participate in central procurement.

III. CONCLUSION

CalCCA appreciates the opportunity to comment on the Plan and looks forward to further collaboration with the Commission and other stakeholders on this topic.

Respectfully submitted,



Evelyn Kahl,
General Counsel and Director of Policy
CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

February 16, 2023

² Erne, David, California Energy Commission. 2023. *Draft Clean Energy Reliability Investment Plan*. California Energy Commission. Publication Number: CEC-200-2023-003 (Plan), at 10.