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MCE Comments on Proposed Scoping Order

Additional submitted attachment is included below.

MCE Clean Energy
My community. My choice.

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March 4, 2016

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 16-IEPR-1
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Draft *2016 IEPR Update* Scoping Order

Marin Clean Energy (MCE) hereby submits its comments on the Scoping Order for the Draft 2016 Integrated Energy Policy Report (IEPR) Update promulgated by the California Energy Commission (CEC). MCE respectfully requests that the CEC includes Community Choice Aggregation (CCA) in the proposed updates. In particular, MCE draws attention to the sections on environmental performance of electricity generation system, climate adaptation and resiliency, and electricity forecast and reliability update, as they are directly impacted by the formation and operation of CCAs across the state. MCE looks forward to actively working with the Commission to provide relevant information to be included in these analyses.

I. Introduction

MCE is the first of the three operating CCAs in California. The other two are Sonoma Clean Power and Lancaster Clean Energy, which began serving customers in 2014 and 2015, respectively. Two more CCAs will begin to serve customers in the 2016, including CleanPower SF in the City and County of San Francisco, and Peninsula Clean Power in San Mateo County.

MCE currently serves over 171,000 customers throughout Marin County, unincorporated Napa County, and the cities of Richmond, San Pablo, El Cerrito, and Benicia. MCE has a peak load of 330 MW, and 89% of MCE's customers are residential customers.

MCE is a not-for-profit public agency formed to reduce greenhouse gas emissions by providing communities within its service area the choice to purchase alternative energy products to PG&E's product. Within MCE's service area, customers may choose one of three energy products: PG&E's 27% renewable energy, MCE's "Light Green" 56% renewable energy, and MCE's "Deep Green" 100% renewable energy.

Currently, approximately 77% of customers within MCE's service area receive generation services from MCE. MCE is fully resourced through 2015 and have long-term power purchase agreements with terms that are typically 20 to 25 years.

II. Incorporating CCAs into proposed updates to appropriately reflect their impacts on the electricity generation system

Although the original statute that enabled CCA did not obligate CCAs to reduce Greenhouse Gas (GHG) emissions, all operational and emerging CCAs have adopted the mission to deploy more renewable energy resources to combat climate change. MCE believes that the 2016 IEPR updates should reflect the impacts of resources procured by CCAs whenever appropriate, as they pertain to environmental performance and reliability issues that are within the Scoping Order.

As existing CCAs continue to grow and new CCAs are expected to come online, they can implement policies and deploy clean energy technologies to support the State's long-term GHG goals, and increase the resiliency of the energy system to climate impacts. Almost all operational CCAs are providing, or exploring, customer-facing demand-side programs in addition to electricity generation services. For example, MCE has been administering an energy efficiency program approved by the California Public Utilities Commission (CPUC) since 2013 to supplement Pacific Gas and Electric Company's (PG&E) program. Recently, MCE applied to become the default energy efficiency program administrator in its service territory. MCE's Business Plan, subject to the approval of CPUC, would make MCE the one-stop shop for customers to learn about and adopt clean energy technologies and environmental services. Sonoma Clean Power and Lancaster Clean Energy also have pilot programs that seek to better understand the electricity needs and consumption patterns of their customers, and to design programs to help meet the State's climate policy goals.

As these analyses can impact future energy policies that would affect CCAs, MCE urges the CEC to include various CCAs and their programs in the assessment. As the CEC staff develops the assessment, MCE is willing to collaborate with the staff to provide appropriate information for various analyses.

III. Incorporating CCAs into electricity forecast and reliability update

California Public Resources Code §25302.5(b) indicates: "The [CEC] shall perform an assessment in the service territory of each electrical corporation of the loss or addition of load described in this section and submit the results of the assessment to the Public Utilities Commission." The loss or addition of load that should be assessed specifically includes load of community choice aggregators in accordance with

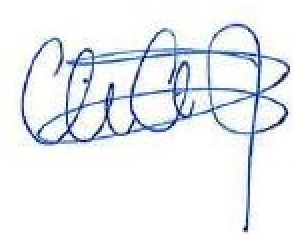
§25302.5(a)(1)(A). Therefore, the CEC is required by law to assess the loss of load attributable to MCE and other CCAs in California.

In addition to reflecting CCA load, the IEPR should include any new generation resources that are being brought online due to CCA procurement. Through its Feed-in Tariff and Open Season Power Purchase Agreement solicitation, MCE's procurement has brought several new resources onto the California grid to meet the electricity demands of MCE's customers. These new resources produce electricity through renewable sources, such as biogas and solar photovoltaic technologies. As the CEC tracks California's progress in meeting the AB 32 greenhouse gas emissions reduction targets, all new renewable resources, including those brought into operation by CCAs, should be accounted for in this assessment.

IV. Conclusion.

MCE respectfully requests that the CEC include CCA electricity load and other customer programs into the IEPR. MCE looks forward to robust participation in the 2016 IEPR Update and thanks CEC staff for addressing this important issue.

Sincerely,



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