

## DOCKETED

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**MCE Comments on May 20 Workshop on Regional Grid Operator**

*Additional submitted attachment is included below.*



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May 20, 2016

California Energy Commission  
Dockets Office, MS-4  
**Re: Docket No. 16-RGO-01**  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Re: Regional Grid Operator and Governance Workshop on May 6, 2016**

Marin Clean Energy (MCE) hereby submits its comments on the Regional Grid Operator and Governance Workshop, which took place on Friday, May 6. MCE's comments focus on the need to ensure that the regional grid operator is accountable to the public and will properly consider state interests. In particular, MCE draws attention to the need to ensure that California's renewable energy policies are not undermined by regionalization.

**I. Introduction**

MCE is the first of four operating Community Choice Aggregators (CCAs) in California. The other three are Sonoma Clean Power, Lancaster Clean Energy, and CleanPower SF. One more CCA, Peninsula Clean Power in San Mateo County, will begin its customer enrollment in September 2016.

MCE currently serves over 171,000 customers throughout Marin County, unincorporated Napa County, and the cities of Richmond, San Pablo, El Cerrito, and Benicia. Later this year, MCE will begin customer enrollment in cities and town of Napa County, and cities of Walnut Creek and Lafayette in Contra Costa County. Inclusion of new communities will increase MCE's customer accounts to approximately 275,000.

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. MCE currently has three products: "Light Green" with 50% renewable energy, "Deep Green" with 100% renewable energy, and "Local Sol" with 100% local renewable energy. Most

recently, MCE's Board of Directors approved the plan to reach 80% renewable energy and 95% carbon free energy by 2025.

## **II. The Governing Entity of the Regional Grid Operator Should Consist of Political Appointees**

CCAs in California are primarily founded to reduce greenhouse gas emissions. CCAs aggressively procure renewable energy contracts so their renewable contents are above and beyond the state-mandated Renewable Portfolio Standard (RPS) requirement. MCE also has an interest in developing local renewable generation sources to spur local economic development and generate employment opportunities.

MCE has several concerns related to the potential impacts of regionalization, and the Energy Commission and the Governor's Office to advocate for a governing board that would be accountable to the concerns of the public. As an entity with a vested interest in developing local renewable sources and job creation, MCE is concerned that regionalization may lead to the scenario where local renewable development becomes less favorable. MCE's ability to procure clean energy has been enabled and empowered by California's clean energy policy, and forming a regional energy market with states that do not currently have the same renewable standards could undermine California's leadership in clean energy.

Additionally, MCE is also concerned that the new regional energy market could lead to increased investment on fossil fuel plants. Because of these concerns, it is crucial for the governing entity of the regional grid operator to provide meaningful opportunities for the public, clean energy advocates, and load serving entities like MCE to engage in the operator's rulemaking process. MCE recommends that the board members to be political appointees from participating states in order to represent state interests, and be accountable to smaller market participants such as CCAs.

## **III. Conclusion**

MCE thanks the Energy Commission and the Governor's Office for the opportunity to provide comments on the governance of the regional grid operator. MCE looks forward to actively participating in future workshops related to regionalization.

Sincerely,



C.C. Song  
Regulatory Analyst