

DOCKETED

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Project Title:	Amendments to Regulations Specifying Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities
TN #:	234558
Document Title:	Alameda Municipal Power Comments on Second 15 Day Language Modification of Regulations
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*Comment Received From: Alameda Municipal Power
Submitted On: 9/2/2020
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**Alameda Municipal Power comments on second 15 Day language
Modification of Regulations**

Additional submitted attachment is included below.



September 2, 2020

Chair David Hochschild
Commissioner Karen Douglas
Commissioner J. Andrew McAllister
Commissioner Janea A. Scott
Commissioner Patty Monahan

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814- 5512

Dear Commissioners:

As the Vice President of the Public Utilities Board (PUB) of the City of Alameda, with oversight over Alameda Municipal Power (AMP), I work closely with AMP to implement policies that reflect our community's clean energy and climate goals. The City of Alameda shares the CEC's interest in renewable energy; as known, starting January 2020, AMP has offered 100% carbon free energy and has continually exceeded the state's renewables goals. In addition, AMP's continues to purchase new and maintain current long-term Renewable Portfolio Standard (RPS) eligible energy as part of its larger sustainability and GHG reduction efforts. Our utility is committed to advancing and expanding its clean energy portfolio while keeping the cost of energy as stable as possible, despite the CoVID-19 Pandemic, wildfires and other challenges facing California's electric grid.

It is with this perspective that I write today, to express great concerns with newly proposed language in the Commission's pending regulations for the RPS program. Changes made in the recently released 15- day language would require Commission staff to make determinations on the long- term status of our utility's contracts. As the oldest municipal electric utility in California, we understand the statutory provisions related to procurement from long- term contracts and ownership agreements and believe the proposed regulatory language does not recognize the responsibility and accountability of our governing board, and would unduly expand the Commission's role beyond that which was envisioned by the Legislature. Of more significant concern is that these changes create regulatory uncertainty and undermine local decision- making that informs AMP's resource procurement planning.

Moreover, proposed language unlawfully grants Commission staff an inappropriate amount of discretion in deciding on the sufficiency of contract provisions relating to resource quantity, term, and delivery. This allows Commission staff to reach beyond what is defined in the

Chair David Hochschild

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Commission's RPS regulations and required by law. This proposed process, coupled with the absence of any timeframe for determining the status of our long-term contracts, creates regulatory uncertainty on AMP's existing and future negotiated contracts. I am concerned that this uncertainty may unnecessarily result in added compliance costs for AMP that will, in turn, increase the cost of electric service for our residents and businesses without actually providing any meaningful benefit.

As noted above, AMP is fully committed to actively partnering with the state to keep the lights on and maintain affordable energy costs for our community members. The PUB body takes its utility oversight role seriously, and hopes to continue partnering with the Commission, and the state as a whole, to ensure that the policies we implement work toward renewable energy procurement goals and resource diversity that supports overall electric system reliability.

For this reason, I respectfully urge you to reconsider this proposal and to work with The City of Alameda, the Northern California Power Agency, and the public power community to address these concerns.

Sincerely,

DocuSigned by:

Gerald M Serventi

Gerald Serventi,

Vice President,

Public Utilities Board,

City of Alameda.

Cc: Senator Nancy Skinner
Assemblymember Rob Bonta
Northern California Power Agency
Nico Procos, General Manager, AMP