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California Energy Commission

**DOCKETED**

**14-IEP-01**

**TN 72734**

**MAR 03 2014**

March 4, 2014

California Energy Commission  
Dockets Office, MS-4  
**Re: Docket No. 14-IEP-1**  
1516 Ninth Street  
Sacramento, CA 95814-5512  
*via email* [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

**Re: Draft 2014 IEPR Update Scoping Order**

As the only operational Community Choice Aggregator (CCA) in the state, Marin Clean Energy (MCE) hereby submits its comments on Draft 2014 Integrated Energy Policy Report (IEPR) Update Scoping Order promulgated by the California Energy Commission (CEC). MCE respectfully requests that the CEC includes within the scope of the proceeding the incorporation of CCA load into the IEPR forecasts.

**I. Introduction**

MCE administers the first CCA program in California; Sonoma Clean Power is expected to begin services to customers in May 2014. MCE currently serves approximately 125,000 customers throughout Marin County and the City of Richmond and has a peak load of 240 MW. 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 19% renewable energy, MCE's "Light Green" 50% 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 CCA Load Projections into the IEPR**

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.

Therefore, MCE respectfully requests that the CEC include CCA load into the IEPR. MCE looks forward to robust participation in the 2014 IEPR Update and thanks CEC staff for addressing this important issue.

Sincerely,

A handwritten signature in cursive script that reads "Shalini Swaroop".

Shalini Swaroop  
Regulatory Counsel