Clean Coalition

February 2, 2018

CPUC Energy Division
Attn: Tariff Unit
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
EDTariffUnit@cpuc.ca.gov

Re: Southern California Edison's (U 338-E) Advice Letter 3722-E: Request to Terminate Southern California Edison Company's Green Tariff Shared Renewables Program

Clean Coalition's Protest of Southern California Edison's Advice Letter 3722-E: Request to Terminate the Green Tariff Shared Renewables Program

Clean Coalition submits this protest of Advice Letter (AL) 3722-E filed by Southern California Edison (SCE) December 22, 2017, proposing cancelation of the Green Tariff Shared Renewables Program (GTSR), which was established pursuant to Senate Bill (SB) 43 in September 2013 and adopted in D.15-01-051.

Clean Coalition opposes SCE's AL and urges the Commission to reject the AL and order SCE to continue the program. Clean Coalition recommends modifications to SCE's program consistent with those proposed by PG&E and SDG&E in their respective Advice Letters[1] to address issues hindering the success of the GTSR program. The Clean Coalition also recommends additional review of the GTSR program by the Commission to assess related issues as warranted.

[1] PG&E Advice 3920-G/5206-E, SDG&E Advice 3168-E

Terminating the GTSR would frustrate the direction of the California Legislature to promote renewables for local disadvantaged communities. The Legislature enacted SB 43 with clear intent to reflect the environmental concerns of utility customers and to maintain and create opportunity in an underdeveloped sector of renewable energy supply, with special consideration for local development and disadvantaged communities, and recently amended the Public Utilities Code to remove the 2019 sunset date previously applicable to the GTSR program. In light of these actions, it is inappropriate for SCE to terminate its program. Termination would mean that SCE customers will have no opportunity to receive a higher level of renewable energy service unless they are either in a position to install their own generation, or live in an area in which Community Choice Aggregation offers a comparable alternative.

Concerns, raised by stakeholders during the initial implementation of GTSR regarding barriers to success of the program, have been borne out. These barriers should be addressed rather than abandoning the program. Both PG&E and SDG&E have submitted proposals to address some of the barriers experienced with the program, particularly those experienced by providers. SCE should do likewise.

Additionally, the Commission adopted practices that create a very real price disincentive to customer enrollment in D.15-01-051. GTSR participants are subject to the Power Charge Indifference Adjustment (PCIA), but receive no credit for avoided costs associated with appropriate deployment of distributed generation. The Commission is actively engaged both in review of the PCIA and determination of DER avoided cost calculations and locational factors, but has not completed or implemented these. We believe the Commission erred in meeting its requirement to seek non-participating ratepayer indifference to the program by failing to account for ratepayer benefits associated with the program. We anticipate that updated valuation of costs and benefits, combined with resolution of supplier participation barriers, will make the program more attractive, especially the Enhanced Community Renewables component.

While we urge rejection of SCE's AL seeking cancelation of their program, due to the number of issues and options for effective remedies we support Energy Division convening a workshop in the near future for the utilities to solicit feedback and suggestions prior to Commission ruling on specific GTSR program enhancements requested by each utility.

For the reasons stated above, the Advice Letter should be rejected, and SCE should be required to submit a new Advice Letter setting forth specific proposals to address the issues it has experienced in GTSR.

Respectfully submitted,

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Service List A.12-01-008 (consolidated)