

# California Public Utilities Commission

## Energy Division

### Clean Coalition Comments on Draft Resolution E-4593 re Southern California Edison Advice Letter 2870-E

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## **Clean Coalition Comments on Draft Resolution E-4593 re SCE AL 2870-E**

The Clean Coalition respectfully submits these opening comments on Draft Resolution re SCE's Advice Letter 2870-E, *Contracts from Southern California Edison Company's ("SCE's") California Renewable Energy Small Tariff ("CREST") Program*.

The Clean Coalition is a California-based nonprofit organization whose mission is to accelerate the transition to local energy systems through innovative policies and programs that deliver cost-effective renewable energy, strengthen local economies, foster environmental sustainability, and enhance energy security. To achieve this mission, the Clean Coalition promotes proven best practices, including the vigorous expansion of Wholesale Distributed Generation (WDG) connected to the distribution grid and serving local load. The Clean Coalition drives policy innovation to remove major barriers to the procurement, interconnection, and financing of WDG projects and supports complementary Intelligent Grid (IG) market solutions such as demand response, energy storage, forecasting, and communications. The Clean Coalition is active in numerous proceedings before the California Public Utilities Commission and other state and federal agencies throughout the United States in addition to work in the design and implementation of WDG and IG programs for local utilities and governments.

### **I. Discussion**

The Clean Coalition supports the draft resolution's decision to approve the 80 CREST contracts as a voluntary expansion of SCE's CREST program. While we support the outcome of the draft resolution we prefer, however, a different rationale (one that is largely supported by SCE's comments on the draft resolution filed June 17).

As we described in comments on SCE's AL 2870-E, SB 380 eliminated any distinction between the CREST and WATER programs. SB 380 is controlling law in this context and should not be left out of the resolution's legal rationale.

We recommend that the Commission instead acknowledge the impact of SB 380 and its removal of any programmatic distinctions, and approve the CREST contracts either as bilateral contracts or as a voluntary expansion of the AB 1969 program. The outcome with respect to AL 2870-E remains the same - approximately 123 MW are left in SCE's FIT program, which can be rolled over into the new SB 32 program when it begins later this year - but at the same time the Commission can consistently order PG&E to offer the 100 MW remaining in its AB 1969 FIT program to any types of customers, rather than only to water/wastewater agencies. PG&E's remaining MW are the topic of a Petition for Modification filed by PG&E and the Clean Coalition has commented separately on that PFM.

We reiterate that this rationale is to be preferred over the rationale offered in the draft resolution because it provides a consistent rationale for releasing the maximum number of MW for DG projects in California, supporting the Governor's 12,000 MW DG goal, which is cited by the resolution and in SCE's advice letter.

## **II. Conclusion**

The Clean Coalition reiterates that it supports the draft resolution and its stated outcome regarding approving the CREST contracts as a voluntary expansion of SCE's CREST program. However, we prefer the legal rationale that is based on SB 380's elimination of any distinction between the WATER and CREST programs and request that the Commission revise the resolution to rely instead on this legal rationale.

Respectfully submitted,

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