*Model Letter of Opposition to SB618(Bradford)*

(DATE)

The Honorable Ben Hueso,

Chair Senate Energy, Utilities & Communications Committee

State Capitol, Room 4035

Sacramento, CA 95814

Re: SB 618 (Bradford)—OPPOSE

Dear Senator Hueso,

The (name of jurisdiction) writes to oppose SB 618 (Bradford). The bill is unnecessary and contrary to the legislative and regulatory framework governing local control of Community Choice Aggregators (CCAs).

The California Public Utilities Commission (CPUC) is already charged with certifying the Integrated Resource Plan (IRP) of each CCA to ensure that those plans meet State requirements. Additionally, SB350 requires CCAs to participate in the same renewable portfolio standard program, subject to the same terms and conditions as the investor owned utilities (IOUs). These plans are first thoughtfully and substantively deliberated upon then approved by each CCA’s public governing boards in an open process.

CCAs have a mission to provide reliable, clean and affordable power while addressing the local needs of their communities. CCAs are local, non-profit agencies that are formed to respond to and invest in the needs of their communities. CCAs are governed and operated by boards consisting entirely of local elected officials who are directly accountable to their ratepayers/voters.

In contrast, Investor Owned Utilities (IOUs) are for-profit corporations with a legal obligation to maximize profits for their shareholders. CPUC and CEC regulators exist, in part, to balance this motivation with the public interest. The CPUC must regulate IOUs to provide a degree of consumer protection including in the context of resource planning compliance with the RPS.

SB618 vests the CPUC with authority to approve or disapprove a CCA's IRP beyond assuring compliance

with the requirements of state law. This conflicts with CCA’s authority and purpose to control their own electricity procurement, subject to state mandates applicable to all load serving entities.

Finally, SB350 became effective law on January 1, 2015. The CPUC is still in the process of implementing the CCA IRP process as directed in SB 350 and approved by the Senate. Thus, nothing has occurred since the passage of SB 350 that would warrant a change to the CCA IRP process established in SB350. The Legislature should allow the CCA IRP process it created in SB 350 to operate before determining whether changes are needed.

For these reasons, (Name of Jurisdiction) opposes SB 618 and asks that you not support the bill

when it comes before your committee.

Sincerely,

Cc: Members of the Senate Energy, Utilities & Communications Committee

Jay Dickinson, Consultant, Senate Energy, Utilities & Communications Committee

Nidia Bautista, Consultant, Senate Energy, Utilities & Communications Committee

Kerry Yoshida, Republican Consultant, Senate Energy, Utilities & Communications Committee