

California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA
customerchoice@cpuc.ca.gov email

12 June 2018

Please include the following late-filed comment regarding CCAs in the record of the 22 June 2018 En-Banc.

Intervenor Californians for Green Nuclear Power, Inc. (CGNP) was an adversarial party in PG&E's controversial application A.16-08-006. CGNP filed an Application for Rehearing in A.16-08-006 the day the CPUC decision was published. Thus, A.16-08-006 continues to have a status of REOPENED.

CGNP reviewed the over-100-page CPUC document (Green Book) released on May 3, 2018. CGNP searched for the term "Audit" as in the CCAs auditing the claims of the suppliers that they will be contracting with to supply power. CGNP notes that the term was absent. Not surprising. CGNP opposed CPUC Proceeding A.16-08-006 which proposes the wasteful and premature abandonment of the highly-functioning, safe, abundant, cost-effective, reliable, and zero-carbon Diablo Canyon Power Plant (DCPP.) PG&E falsely claimed that DCPP would no longer be needed in that Proceeding.

CGNP criticized the LACK of any requirements for the CCAs to audit their suppliers regarding claims of supplying zero-carbon power. Thus, firms like PacifiCorp that already have a bad record of "greenwashing" their fossil-based power by falsely claiming that it is zero-carbon will be able to sell their power to CCAs, which harms the environment.

PG&E falsely claims that CCAs represent departing load for the utility.
CGNP has already located a Peninsula Clean Energy (PCE) CPUC filing in which the CCA is planning to purchase power from PG&E!

Furthermore, CCAs will be adding their overhead to the cost of the power that they purchase. CGNP previously learned that PCE is assessing a 10% overhead charge.

SUMMARY: Likely increased air pollution. Likely increased power bills.
CCAs also have a controversial requirement that those that don't want to participate must "opt out." All in all, CCAs are a very bad deal for California ratepayers and for the environment. The enabling legislation should be rescinded.

I respectfully request confirmation that this late-filed Public Comment will be included in the record of the 22 June 2018 En-Banc regarding Community Choice Aggregators.

Sincerely,

Gene Nelson, Ph.D. Legal Assistant and Government Liaison Californians for Green Nuclear Power, Inc. (CGNP)

(████) █████ - █████ cell

Government@CGNP.org email