

To CPUC California Customer Choice team at customerchoice@cpuc.ca.gov:

Here are my comments on CPUC's draft "Green Book" (GB) and its "customer choice" concerns:

GB fails to address or even mention many or most salient comments made at a previous GB "customer choice" workshop, in particular [comments submitted by CACE](#). This failure makes CPUC's call for "more conversation" hollow and unconvincing.

If CPUC wants "more conversation" about choice, why does President Michael Picker call Community Choice "forced collectivization"?

GB fails to address real California problems or offer real solutions, making GB appear as largely a quest around an invented problem.

GB's focus on "retail choice" is mistaken. Instead, GB should be asking, what best suits ratepayers' needs, what best meets State policy objectives?

Vague GB allegations of "crisis" and "no plan" and "broken system" are without merit. Scary "energy crisis" language is tendentious and inappropriate. The "plan" is what existing CPUC proceedings, in aggregate, are set up to formulate.

GB's assertions about "risk" are amorphous and unspecific.

GB's alleged areas of concern — affordability, decarbonization and reliability — are all being addressed in existing CPUC proceedings.

Current integrated resource planning system ensures system-wide efficiency, and Community Choice programs participate fully.

GB fails to mention that Community Choice programs are more affordable and decarbonizing faster than investor-owned utilities (IOUs). CCAs already exceed State GHG reduction targets, are beginning to decarbonize transport and incorporate local resiliency into planning,

GB's apprehension about "reliability" seems to be cover for keeping polluting gas plants running. Reliability is achievable and affordable, not by traditional gas peakers but by an advanced combination of storage, stepped-up efficiency and conservation, automated demand response, local district management and intelligent grid technologies. Solar is now more flexible and dispatchable than most fossil-fueled or nuclear baseload generation.

GB fails to ask why ratepayers are abandoning utilities in favor of alternatives like Community Choice. There is no clamor for "retail choice" but there is strong evidence people want and like Community Choice programs.

GB neglects to mention that Community Choice programs are significantly cleaner (lower carbon) and (mostly) cheaper than IOUs' product.

If CPUC needs help of other agencies to transition to some other undefined, more secure, different control/delivery/regulatory model, why doesn't GB just say so?

How can GB claim to study "other markets" and new control/delivery/regulatory models when it ignores CCAs, what they can do better, why local governments and ratepayers like them?

GB fails to evaluate IOU past performance and capability related to provider of last resort, IOU financing of CPUC assigned DER procurement, EVs, energy efficiency, rooftop solar and storage mandates.

GB fails to comprehensively analyze, categorize and rank what ratepayers want, and why ratepayers are deserting IOUs and seeking other alternatives.

GB wrongly assumes the power content label is sufficient to inform ratepayers. GB overlooks metrics for local control, local development, DER procurement, and storage procurement.

GB fails to consider delivery models that maximize local benefits. The "California Model" of choice is evolving to do that.

The CCA model provides us an opportunity to focus on local control and local benefit whereas the centralized industrial scale model will continue to ignore economic "externalities" such as GHG emissions, environmental justice issues, and the like.

GB makes no distinction between choices that result in local, non-profit procurement and choices that result in for-profit, wholesale, remote procurement.

GB neglects the option of a third-party entity (neither CCA nor IOU) being provider of last resort (as in Texas). CCAs have indicated willingness to become providers of last resort.

If centralized CPUC resources and staff are already stretched thin, what can justify CPUC assuming still more onerous burdens of centralized control over CCA community-based procurement?

GB should ask whether the existing traditional centralized CPUC regulatory structure deters, discourages and delays the vital energy revolution and radical technological advances now trying to take shape. Is CPUC's apparatus standing in the way of this revolution?

Bottom line: GB seems mainly motivated to keep monopoly utilities whole, obsolescent IOU business plans intact, and traditional for-profit income streams flowing. Is GB an IOU set-up to eventually get the Legislature to grant CPUC more bureaucratic control and power over CCA procurement, and to erode community autonomy of elected local CCA boards of directors?

Customer choice is best achieved through Community Choice.

— Edward Mainland, [REDACTED]

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