**Request for Informal Comments and Recommended Solutions on the Draft Green Book**

**\*\*\*COMMENT DEADLINE EXTENDED TO JUNE 11\*\*\***

The Draft Green Book is designed to initiate a policy conversation among a wide range of stakeholders and interests to develop a meaningful and comprehensive plan to address the current policy shifts in California’s electric sector as it relates to customer choice.  Its stated objective is to inform the next stage of the process leading to potential actions.  The deadline for stakeholder comments has been extended from June 4, 2018 to June 11, 2018.

At the May 10, 2018 Commission business meeting, there was discussion about the Customer Choice Project to create a roadmap for an overarching plan.  The Project team, in conjunction with Energy Division, will assess whether issues raised in the Draft Green Book are being examined in current Commission proceedings and perform a gap analysis to identify the issues that remain unaddressed.  The informal written comments and the En Banc are an opportunity for stakeholders to provide input.

When submitting your comments, the California Customer Choice team requests that stakeholders frame their comments with the questions below:

* What is the issue?
* Is the issue currently addressed in an existing proceeding? If so, what should be done in that forum? (As discussed below, all informal comments will be served by staff on the identified proceeding service lists) If not, what is the recommended course of action?  Is there an appropriate forum for action? Provide the rationale for recommended solutions.

Please address your informal comments and recommended solutions to:  California Customer Choice team at [customerchoice@cpuc.ca.gov](mailto:customerchoice@cpuc.ca.gov).

**Request for Informal Comments on the Green Book Draft**

For comments on the Draft Green Book, the California Customer Choice team seeks input on the following:

* Corrections to misstatements; and
* Topics related to customer choice that were not covered.

**Request for Recommended Solutions**

To focus the conversation at the June 22nd En Banc and the Draft Green Book’s public review process, we are seeking stakeholder input on recommended solutions to the fundamental questions raised on pages 5-6 of the Draft Green Book (reproduced below).  We invite the stakeholders to submit informal comments on those topics of primary interest to them and include recommended solutions to these questions as part of their submittals.

**Fundamental Questions for Policy Makers and Stakeholders to Inform Future Action**

Creation of wider choices and broader alternatives for electric service require a pathway to accomplishing California’s energy policy objectives as defined by the Core Principles and Key Questions set forth in this paper. We are seeking stakeholder engagement to further explore these fundamental questions which include the following:

* How does California continue its course as a global leader in achieving deep decarbonization as regulated utilities provide electricity to fewer Californians?
  + Does there need to be a single entity for policy target setting, implementation, oversight and enforcement?
  + How can California continue to support innovation and provide financing for scaling up new technologies?
  + What is needed reduce the use of fossil fuels such as natural gas, which is used not just for electric power, but also for industry and in homes and buildings?
  + How are the utilities compensated for providing the essential infrastructure to achieve these policies?
* What are the essential grid operations to make sure California’s lights stay on?
  + Who has the requirement to perform the necessary functions?
  + Who establishes the rules and has enforcement authority?
  + What does it cost and who pays?
* Can California provide investment and operational certainty to address reliability and resiliency, especially in the face of catastrophic events that impact the electric sector, such as the 2017 wildfires?
  + With so many decision-makers entering into the market to provide electrical supply, how do we ensure coordination to provide all the energy needs for reliability purposes?
  + Who will provide backstop procurement for resource adequacy if there are shortages of power needs identified in planning and a disaggregated set of electricity purchasers cannot fill the need?
  + Who will coordinate supply and operations during local events where resources must come from outside the region? What is the responsibility of non-utility electricity suppliers to help meet unexpected contingencies?
  + What role do non-utility providers play to ensure adequate responses to catastrophic and emergency events?
* Are there adequate protections for all customers with the wider choices created by Direct Access, CCAs and behind-the-meter installations?
  + Should there be a state entity that provides basic customer protections to customers of services that are either behind the meter or served by entities not historically under the jurisdiction of the CPUC?
  + Who will ensure that customers have access to power service if a lightly or unregulated electric power provider fails?
  + What protects customers who are not interested in choice, elect not to engage or unwittingly make the wrong decision or might otherwise be left behind?
* What is the role of the investor-owned utilities in the new regulatory construct?
  + Under all visions of the future, the IOUs continue to provide transmission, distribution and other grid services, what are the requirements to maintain these systems?
  + How will these utilities be compensated for building the necessary infrastructure and operating the grid?
* Regulated utilities were required by laws, like the Renewables Portfolio Standard, to enter into long-term contracts. If customers increasingly buy electricity from non-utility sources, what happens to the contracts that the regulated entities executed?
  + Who will execute the long-term contracts that can be used to finance construction of new facilities going forward?
  + Should the incumbent electric utilities be allowed to compete with other market participants, or should they be limited to offering a platform for other electricity suppliers?

Stakeholders may address the following topics and address all or only those of greatest interest in their informal comments:

* Centralized procurement review and authority
* Consumer protection regarding:
  + power content disclosure
  + price transparency
* Cost-shifts to non-participants
* Credit backing for long-term contracting for resources
* Decarbonization goals: IRP and its relationship to the Renewables Portfolio Standard
* Funding of California’s public purpose programs
* Future role of Investor Owned Utilities
* Grid safety and Cybersecurity
* Provider of Last Resort
* Resource adequacy

If you have any questions, please contact us at [customerchoice@cpuc.ca.gov](mailto:customerchoice@cpuc.ca.gov)

*Note: These comments are being solicited by the California Customer Choice team as part of the Draft Green Book review process and are not part of an ongoing Commission proceeding.  Please address your comments to:  California Customer Choice team at* [*customerchoice@cpuc.ca.gov*](mailto:customerchoice@cpuc.ca.gov) *.*

*Comments and statements at the En Banc may be relevant to the proceedings listed on the distribution list for this announcement.  It is expected that one or more Commissioners may read these comments and will attend and participate in the En Banc.  One or more advisors to the CPUC Commissioners may also be in attendance at the En Banc.  Other Commission decision-makers may also attend the En Banc. The En Banc agenda will be publicly noticed on the Commission’s Daily Calendar more than 10 days in advance, so statements made at the En Banc will not constitute an ex parte contact. The California Customer Choice team will post all comments received by June 11th simultaneously at a later date to the Customer Choice website, at* [*http://www.cpuc.ca.gov/customerchoice*](http://www.cpuc.ca.gov/customerchoice)

*Since the comments are being sent directly to the California Customer Choice team and will be made publicly available at the same time, under Rule 8.2(c )(3)(A)  of the Commission’s Rules of Practice and Procedure, this public posting will satisfy the need to avoid each individual party to have to separately notice any implicated proceedings.*