



January 22, 2021

VIA ELECTRONIC MAIL

Mr. Ed Randolph
Director, Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Comments On Draft Resolution M-4849 - Authorization And Order Directing Utilities To Extend Emergency Customer Protections To Support California Customers Through June 30, 2021, And To File Transition Plans For The Expiration Of The Emergency Customer Protections

Dear Mr. Randolph,

In accordance with Rule 14.5 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure and the notice accompanying Draft Resolution M-4849 (Draft Resolution), the California Community Choice Association (CalCCA) provides these opening comments on the Draft Resolution. CalCCA supports the Draft Resolution's extension of existing customer protections during the COVID-19 pandemic and urges the application of these protections in the same manner they have been implemented for the initial protection period. CalCCA requests that the Commission direct the investor-owned utilities (IOUs) to coordinate with Community Choice Aggregators (CCAs) in the development of the mandated transition plans that will be implemented upon expiration of the existing protections.

The Commission issued the Draft Resolution to extend the residential and small commercial customer protections adopted in Resolution M-4842, which was issued in response to the COVID-19 pandemic, through June 30, 2021.¹ Resolution M-4842 directed the investor-owned utilities to suspend disconnection for nonpayment, waive deposit and late fee requirements for residential customers, waive deposit requirements for new service, and implement other similar protections.² The Draft Resolution also reserves the option to extend these protections further as conditions require.³

CalCCA supports the Commission's directives to continue these protections for residential and small commercial customers as the country continues to struggle with the health, economic, and many other impacts. These protections should be implemented applying the IOUs' ongoing practices under the first protection period. In particular, Pacific Gas and Electric Company should continue to apply its suspension of Tariff Rule 23.R.3 or partial payments as approved by the Energy Division in Advice

¹ Draft Resolution at 1.

² *Id.* at 5.

³ *Id.* at 1.



Mr. Ed Randolph
Page 2
January 22, 2021

Letter 5816-E-B,⁴ and Southern California Edison Company should continue its existing practices for application of partial payments by unbundled customers.

The Draft Resolution directs electrical corporations to implement the extension through a Tier 1 Advice Letter no later than 10 days following approval of the Draft Resolution.⁵ It further requires the IOUs to develop transition plans to address the ultimate expiration of the existing protections and to file their transition plans by April 1, 2021, through a Tier 2 Advice Letter. This is a critical step in maintaining stability for customers, and CalCCA looks forward to working with the IOUs in developing these transition plans.

Respectfully,

CALIFORNIA COMMUNITY CHOICE ASSOCIATION

Evelyn Kahl

General Counsel

cc via email:

Energy Division Tariff Unit (edtariffunit@cpuc.ca.gov)

April Mulqueen (April.Mulqueen@cpuc.ca.gov)

Service Lists:

A.19-09-014

A.19-11-003

A.20-03-014

R.12-06-013

R.15-03-010

R.17-06-024

R.18-07-005

R.18-07-006

R.18-03-011

⁴ PG&E Advice Letter 5816-E at 7.

⁵ *Id.*, Ordering Paragraph 2, at 21.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of California Community Choice Association' **COMMENTS ON DRAFT RESOLUTION M-4849 -**

AUTHORIZATION AND ORDER DIRECTING UTILITIES TO EXTEND EMERGENCY CUSTOMER PROTECTIONS TO SUPPORT CALIFORNIA CUSTOMERS THROUGH JUNE 30, 2021, AND TO FILE TRANSITION PLANS FOR THE EXPIRATION OF THE EMERGENCY CUSTOMER PROTECTIONS

to the to the attached service lists in:

A.19-09-014	SDG&E Application to Eliminate Seasonal Differential in Residential Rates
A.20-03-14 - A.19-11-003	California Alternate Rates for Energy and Energy Savings Assistance Programs of large IOU and SMJU
R.12-06-013	Examination of IOUs' Residential Rate Structures
R.15-03-010	Access to Affordable Energy in the San Joaquin Valley
R.17-06-024	Evaluating Low-Income Rate Assistance Programs for Water Utilities
R.18-03-011	Emergency Customer Protections
R.18-07-005	New Approaches to Disconnections and Reconnections
R.18-07-006	Assessing Utility Service Affordability

Dated January 22, 2021, at Martinez, California.

/s/ SHAWN-DAI LINDERMAN
SHAWN-DAI LINDERMAN



California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION

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FILER: WEST COAST GAS COMPANY INC.

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PROCEEDING: A1911003 - PG&E - FOR APPROVAL

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CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: A1909014 - SDG&E - TO ELIMINATE

FILER: SAN DIEGO GAS & ELECTRIC CO.

LIST NAME: LIST

LAST CHANGED: JANUARY 13, 2021

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California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION

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PROCEEDING: R1807006 - CPUC - OIR TO ESTABL

FILER: CPUC

LIST NAME: LIST

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