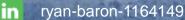


Community Choice Aggregation Considerations

Ryan Baron, Of Counsel

City of Santee January 9, 2019

Best Best & Krieger









Operational Jac of June 2018)

MCE Clean Energy Marki, Napa and Contro Costa Counters, Oly of Benicia

Sonoma Clean Power Spiorre and Mendocire Countee

Lancaster Choice Energy (1)

Clean Power San Francisco

Peninsula Clean Energy Sen Mater County

Silicon Valley Clean Energy Most of Sente Clerk County

Redwood Coast Energy Authority Harbold Courty

Apple Valley Choice Energy (2) Clean Power Alliance of Southern CA Phase T - Manapal LA County

Monterey Bay Clean Power Santa Cruz, Monterey, San Bendo Coondea

Pioneer Community Energy Piecer County

Pico Rivera Municipal Energy (PRIME) (3)

San Jacinto Power (4)

Rancho Mirage Energy Authority (5) East Bay Community Energy Alemede County

Valley Clean Energy Alliance Unicoported Holo County: Coles of Davis and Woodland

Solana Beach Energy Alliance (0)

2018 Launch unnotation

Clean Power Alliance of So CA Phase 2 - Unincorporated LA County, South Pasethina, Rolling Hits

Desert Community Energy (7) Citing of Palm Springs, Cathedral Gay, Palm Desert King City (8)

San Jose Clean Energy (9) Phase 1

2019/2020 Launch /micewidt

Clean Power Alliance So CA Ventury County and 20+ additional offes San Jose Clean Energy Phase 2 San Luis Obispo/Morro Bay Unincorporated Riverside County Western Community Energy / WRCOG (70)

Investigating

Counties of: Cities of: Baldwin Park Butte Carlsbad Fresho Kings Commorco Dei Mar Modoo El Monta Nevada Encinitias San Joaduln Hanford Santa Barbara Oceanside Splano Pomona San Diego Santa Paula





Status of CCA in San Diego County

- Solana Beach Energy Alliance
 - https://solanaenergyalliance.org/
- Encinitas, Del Mar, Oceanside, Carlsbad
 - Four city feasibility study
- La Mesa and Chula Vista
 - Two city feasibility study
- City of San Diego
 - Announced regional JPA





What is community choice aggregation?

- Allows cities, counties, and cities and counties through a joint powers authority to aggregate the electric load of their residents and businesses and provide retail electricity (AB 117, Migden, 2002)
- Buy wholesale power through power purchase agreements (PPAs) and/or generate power
- Also known as community choice energy





Why was CCA adopted?

- Law was passed during California energy crisis allowing communities to purchase wholesale power and/or generate local power
- An alternative to forming a municipal electric utility and condemning existing utility transmission and distribution
- Retail electricity is a natural monopoly. Large institutional consumers can participate in Direct Access market but residential and most business consumers don't have choice in electric providers





How Local Energy Aggregation Works delivery customer source UTILITY CCA YOU buying and building delivering energy, benefitting from electricity supply maintaining lines, affordable rates,

billing customers

affordable rates, local control, cleaner energy

2018 BEST BEST & KRIEGER LLI

Reasons to Form

- Consumer choice
- Provide residents with lower energy rates (generation) than the IOU
 - CCAs have offered 2-5% savings or more
- Offer customers greater renewable energy options
 - CCAs offer 50% and 100% renewable plans
- Faster progress toward community environmental goals
 - Satisfy AB 32 requirements
- Offer energy efficiency, conservation and climate change programs





Reasons to Form

- Economic development tool
 - Brings electricity revenues directly to the community
 - Attract businesses through rate savings
 - Municipal utility bill savings
 - Develop local power sources and facilitate rooftop solar growth
 - Energy efficiency programs, EV rebates, EV charging, purchase street lights



Reasons to Form

- Local control
 - Public decision-making is local/regional
 - City Council or CCA board of directors is directly accountable for decisions
 - IOU customer service, CPUC complaint process

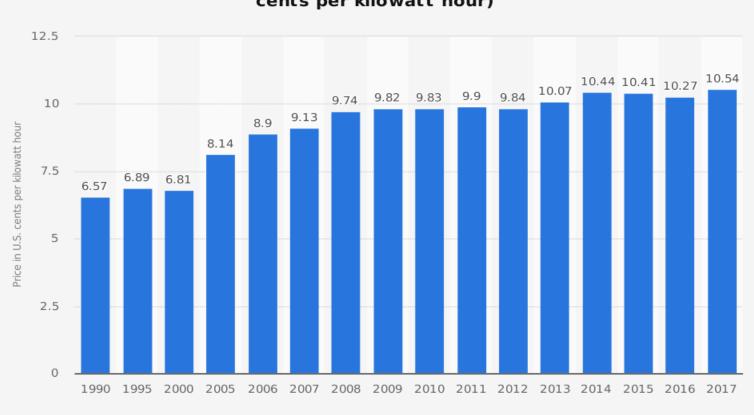


Competing Priorities

- Rate savings GHG reduction Building reserves Community Programs
- Some communities may only be focused on cost, others on programs
- Higher renewables costs more
- Offering additional rate savings may cause more time to build up reserves







Average retail electricity prices in the U.S. from 1990 to 2017 (in U.S. cents per kilowatt hour)

Source EIA © Statista 2018 Additional Information: United States; EIA; 1990 to 2017



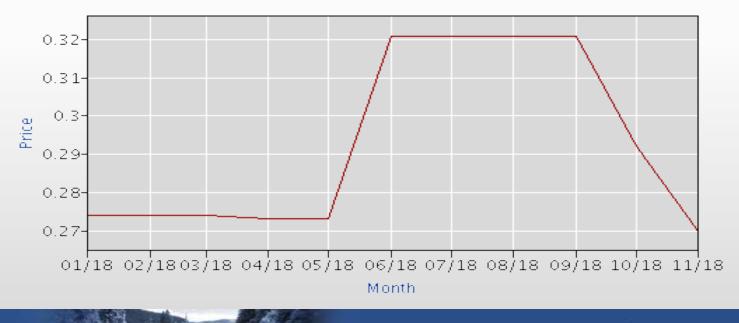




LLP

Average Retail Electricity Price U.S. Bureau of Labor Statistics

California	\$0.152 kWh
Los Angeles	\$0.184 kWh
San Diego	\$0.292 kWh



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Governance Structure

- Individual city or county (enterprise fund)
- Joint powers authority (JPA)
- Special legislation
 - Sonoma County Water Authority
 - Kings River Conservation District
 - Public agency that has authority to provide retail power can provide to cities contiguous to it
- Operations In-house management, consultants, hybrid, turn-key models





Basic Steps

- Feasibility study
- Public deliberation period
- Pass ordinance or resolution
- Form enterprise fund or JPA
- CPUC approved implementation plan
- Customer outreach
- Launch





Customers, Billing & Collections

- Residents and businesses are automatically enrolled in CCA (ordinance)
- Customer must affirmatively opt-out
- CCA provides two notices prior to enrollment and two notices after enrollment
- Opt out within 60 days after service commences with no charge
- Customer must wait 12 months before returning to CCA
- IOU provides all metering, billing and collection
- IOU provider of last resort





Business Considerations

- What is the City's projected load?
- What types of ratepayers are within the City?
- What are current and projected energy prices?
- Are there projected savings?
- What are market risks?
- Do City ratepayers desire greater choice in renewable options products?
- Climate action plan?
- Is the City interested in retaining CCA revenues for CCA related projects and programs?
- CCA management





Financial Considerations

- CCA with a 60,000 population
 - \$300,000 to \$500,000 for upfront costs through launch
 - Line of credit for approx. \$10M for cash working capital at launch and collateral for power purchase agreements, resource adequacy.
- Larger regional CCA of 5-7 cities
 - \$1,000,000 for planning costs and \$2M to \$5M for launch
- CCA providers have loaned start-up CCAs the necessary start-up costs at 5% interest. Other CCAs have been funded by one or two banks through lines of credit. Larger CCAs have had advances from larger public agencies like a county or a county water agency.



Legal and Liability Considerations

- Governance structure
- Solely responsible for all generation procurement
- Must serve all residential customers
- Proposition 26 and rate setting
- Liability to City General Fund
- Termination of CCA program obligation to buy power once procured
- Creditworthiness for long-term power agreements
- Risk management policy
- Withdrawal from JPA prior to launch





Regulatory Considerations

- CPUC registration timelines for CCAs (CPUC Resolution E-4907) – Implementation plan submitted to CPUC one year prior to launch
- Participation in CPUC's year-ahead Resource Adequacy planning process
- IOU exit fees (power charge indifference adjustment)
- Load forecast and GHG reduction filings
- Compliance filings
- Creeping CPUC jurisdiction
- Centralization of energy procurement





Power charge indifference adjustment (PCIA)

- aka "IOU exit fees"
- Statutes prohibit IOU and CCA customers from being financially impacted from load departing to CCAs
- Customer indifference
- IOUs allowed to charge CCA customers for "stranded costs" of IOU generation that was purchased or built to serve customer that has now left for CCA





PCIA Historical

- PCIA has historically been 2-3 cents kWh
- Not transparent, predictable or stable





CPUC PCIA Decision

- IOUs can include utility owned generation assets that were in place prior to 2002
- No sunset period on cost recovery (formerly 10 years)
- Cap and Floor
 - No floor, PCIA can be negative
 - Cap of \$0.005/kWh for annual increases beginning in 2020
- True-Up
 - Adds uncertainty for CCAs but more certainty for IOUs to avoid under-recovery of costs
- Prepayment options to be expanded in Phase 2





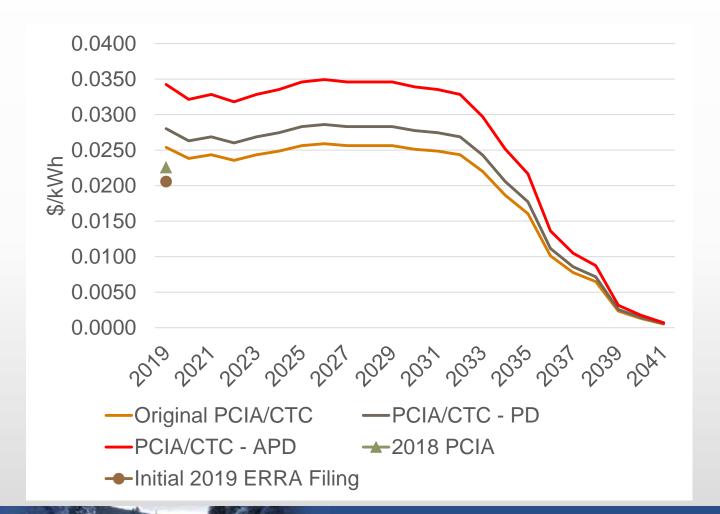
2018 PCIA Exit Fees

	PG&E	SCE	SDG&E
Residential	0.03346	0.01877	0.02547
Small Commercial	0.02466	0.01204	0.02613
Medium Commercial	0.02502	0.01565	0.02033
Large Commercial	0.02104	0.01296	002033
Industrial	0.01888	0.01049	0.02033
Lighting	0.00589	0.00002	0.00000
Agriculture	0.02463	0.01165	0.01441





PCIA Post-CPUC Decision







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Ryan Baron

Best Best & Krieger LLP Office: Irvine 949-263-6568 ryan.baron@bbklaw.com www.bbklaw.com



