



Related to Policy Number: 1
Board Adoption Date: January 27, 2022

Peninsula Clean Energy Authority 2022 Legislative and Regulatory Policy Platform Policy

Overview and Purpose

Peninsula Clean Energy Authority's Policy Platform (Platform) serves as a guide to the Peninsula Clean Energy Board of Directors (Board) and Peninsula Clean Energy staff in their advocacy efforts and engagement on policy matters of interest to Peninsula Clean Energy.

The Platform provides a framework and guidance that allows both Board members and staff to pursue legislative, regulatory, and administrative actions at the local, regional, state, and federal levels in a consistent manner and with the understanding that they are pursuing actions in the best interest of the organization and its mission, its member agencies, and its customers.

The Platform also enables the organization to move swiftly to raise and respond to issues before the federal and state Legislative and Executive Branch agencies including the California Public Utilities Commission, the California Energy Commission, California Independent System Operator, and the California Air Resources Board so that Peninsula Clean Energy's views can be heard on important matters in a timely fashion.

The Platform also provides guidance to Peninsula Clean Energy's Chief Executive Officer on support or oppose positions that should be taken on legislative matters identified by the staff regulatory lead, the staff legislative lead, and the California Community Choice Association (CalCCA) Board of Directors.

The policy platform will be reviewed and updated annually and presented to the Board for consideration at its January Board meeting.

I. Governance and Authority

- a. Oppose policies that limit the local decision-making authority for Community Choice Aggregators (CCAs), including rate-setting authority and procurement of energy and capacity to serve their customers.
- b. Oppose policies that limit Peninsula Clean Energy's ability to effectively serve its customers.
- c. Support policies that make it easier for cities and counties to form a CCA, become members of Peninsula Clean Energy or other CCAs, and oppose policies that restrict that ability.
- d. Support policies that level the playing field and improve access of CCAs within state programs, including permitting CCAs to elect to administer funding overseen by state agencies.

- e. Support policies that encourage and expand public access to Peninsula Clean Energy meetings and enhance the attendance and participation of Peninsula Clean Energy's Directors at Peninsula Clean Energy meetings.

II. Decarbonization

- a. Advocate for and support policy efforts to accelerate decarbonization of the energy sector, transportation, and the built environment.
- b. Advocate for and support the abolishment of ratepayer or taxpayer funded subsidies for fossil fuel use and fossil fuel-fired equipment.
- c. Advocate for and support policies to support and expand access to transportation electrification and building electrification, including funding for said electrification.
- d. Support policies that incorporate the social costs of carbon
- e. Advocate for and support efforts to ensure flexibility in program design so that local data and local needs directly inform program offerings.
- f. Support state funding for electric vehicle infrastructure grant programs and for CCA participation in said grant programs.
- g. Support policy efforts to incentivize the delivery of carbon-free and renewable energy on a 24-7 basis.
- h. Advocate for and support legislative and regulatory efforts to provide incentives, including financial support, that enable and support underserved communities in achieving decarbonization.
- i. Support and advocate for policies to expand customer financing options, such as tariff on-bill financing, that promote the decarbonization and electrification of buildings.

III. IOU Charges and Exit Fees (Power Charge Indifference Adjustment (PCIA))

- a. Support efforts to ensure energy affordability and equity in customer rates.
- b. Support efforts that seek to eliminate exit fees including the PCIA or wind down exit fees within a reasonable time frame.
- c. Support efforts to minimize the cost of the PCIA generally and minimize its impact on Peninsula Clean Energy's rates.
- d. Support efforts, including CalCCA's efforts, to increase the transparency of IOU electricity contracts that provide the basis for PCIA charges.
- e. Support policies that would bring stability to the PCIA and/or provide new mechanisms for CCAs to securitize PCIA charges.
- f. Oppose policies that would increase or expand exit fees and regressive fees on CCA customers.
- g. Advocate for policies that do not penalize ratepayers for taking service from a CCA over another load-serving entity (LSE).

IV. Power Procurement & Grid Reliability

- a. Support legislation sponsored by CalCCA to implement the recommendations from Working Group 3 via statute.
- b. Oppose policies that would supplant or reduce CCAs' procurement authority.

- c. Support reform of the CPUC resource adequacy program to allow for stability in the resource adequacy value of existing resources
- d. Support policies that advance and accelerate the delivery of carbon free and renewable energy on a 24/7 basis.
- e. Support policies that value the resource adequacy contribution of solar, wind and storage resources.
- f. Oppose unreasonable fixed charges and support measures that make solar affordable and decrease customer's bills.
- g. Advocate for and support efforts to remove barriers to demand response, microgrids and behind the meter resources to provide Resource Adequacy.

V. Environmental Justice & Affordability

- a. Support policies that improve the ability of underserved communities in the Peninsula Clean Energy service territory to have affordable, reliable, and clean energy.
- b. Support policies that strengthen the resilience of vulnerable communities to the impacts of climate change.
- c. Support policies that enable all communities, including emerging and historically marginalized communities in California, to participate in and benefit from decarbonization efforts.

VI. Community Resilience

- a. Advocate for and support funding for programs implemented by CCAs and their member jurisdictions to increase community resilience to wildfires, PSPS events, other potential service disruptions, and climate change impacts.
- b. Support policies that reduce barriers to microgrid development by CCAs.
- c. Oppose policies that would enable IOUs to be the sole developer of microgrids.
- d. Support policies that increase development of community-level resources and distributed energy resources that improve resilience and reduce the need for new transmission and distribution infrastructure, including expansion of rooftop and community solar.

VII. Local Economic Development

- a. Support policies that are consistent and oppose policies that are not consistent with Peninsula Clean Energy's commitment to a sustainable workforce.
- b. Support policies that enhance opportunities for CCAs to promote local economic development through locally designed programs that meet the unique needs of their member agencies, communities, and customers.
- c. Support efforts to enhance the development of local and regional sources of renewable energy, including but not limited to solar, wind, offshore wind, small hydro, and geothermal energy.
- d. Support policies that enable CCAs to collaborate with their member jurisdictions on local energy resources and projects to advance environmental objectives.

- e. Advocate for and support efforts to direct federal economic stimulus/recovery funding to CCAs to deliver local energy resources and projects, as appropriate.

VIII. California Energy Market Structure

- a. Oppose policies that expand direct access or the ability or economic incentives for electric service providers to selectively recruit CCA or IOU customers.
- b. Support policies that would create renewable content and environmental standards for electric service providers to match the products offered by CCAs.
- c. Support policies that change California's market structures towards innovative models that reduce costs of energy service and supports the expansion of carbon-free resources.
- d. Support policies that fully value distributed energy resources including energy products they can provide and the complete range of benefits which they can provide to the grid.
- e. Support policies that provide flexibility in renewable energy tracking systems and modernize tracking system technology.
- f. Support policies that allow for more timely availability of load data to CCAs.
- g. Support policies to streamline regulatory reporting and reduce duplicative reporting requests.