

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED

04/15/19
04:59 PM

Order Instituting Rulemaking to Develop
an Electricity Integrated Resource Planning
Framework and to Coordinate and Refine
Long-Term Procurement Planning
Requirements.

Rulemaking 16-02-007
(Filed February 19, 2016)

**NOTICE OF *EX PARTE* COMMUNICATION
OF THE PUBLIC ADVOCATES OFFICE**

Pursuant to the California Public Utilities Commission's (Commission) Rules of Practice and Procedure 8.4 (a), the Public Advocates Office at the Commission (Cal Advocates) provides notice that it met with Rachel Peterson, Chief of Staff for Commissioner Liane Randolph, and Suzanne Casazza, advisor to Commissioner Randolph, to discuss the March 18, 2019 proposed *Decision Adopting Preferred System Portfolio and Plan for 2017-2018 Integrated Resource Plan* (PD). The Public Advocates Office initiated the communication, which was a conference call at noon on April 10, 2019, which lasted approximately 20 minutes. Participating for the Public Advocates Office were Tim Drew, Project Coordinator, Helena Oh, Project Coordinator, and Diana Lee, Staff Attorney.

The Public Advocates Office expressed its support for the PD, including the selection of the Reference System Plan updated with the California Energy Commissions 2017 Integrated Energy Policy Report (IEPR) forecast estimates and 40-year life assumptions for the retirement of natural gas generators as a planning benchmark (Reference System Plan), because the Reference System Plan is projected to achieve greenhouse gas (GHG) targets at a lower cost and with greater reliability than the Hybrid Conforming Portfolio. The Public Advocates Office supported the PD's recommended transmittal of the Reference System Plan and sensitivities for in-state and out-of-state renewables to the California Independent System Operator (CAISO) for use in the CAISO's Transmission Planning Process.

The Public Advocates Office supported the PD's recommendation to adopt a Procurement Track to evaluate pressing issues related to the procurement of clean, reliable, and affordable resources in order to meet the 2030 GHG emissions target and near-term renewable

integration needs, without resorting to an abbreviated advice letter process. The Public Advocates Office therefore recommended that the Commission not adopt Southern California Edison Company's proposed trigger mechanism but recommends that the Commission instead consider urgent reliability issues in the proposed procurement track.

Respectfully submitted,

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April 15, 2019