

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**

04/05/19  
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

**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 Sean Simon, Chief of Staff for Commissioner Clifford Rechtschaffen, 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 took place at the Commission's San Francisco office at 505 Van Ness Avenue on April 3, 2019 at 3:00 p.m. and 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 (Reference System Plan) as a planning benchmark, 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 emphasis on accountability among the growing number of load-serving entities (LSEs), including the requirement that some LSEs refile their IRPs to meet the requirements of Senate Bill 350. Finally, the Public Advocates Office supported the PD's recommendation to implement 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.

Respectfully submitted,

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April 5, 2019