

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED
10-05-15
04:59 PM

Application of Pacific Gas and Electric
Company for Authority, Among Other
Things, to Increase Rates and Charges for
Electric and Gas Service Effective on
January 1, 2017.

Application 15-09-001
(Filed September 1, 2015)

RESPONSE OF SONOMA CLEAN POWER

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Attorney for: SONOMA CLEAN POWER

October 5, 2015

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OF THE STATE OF CALIFORNIA**

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RESPONSE OF SONOMA CLEAN POWER

Pursuant to Rule 2.6 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, Sonoma Clean Power (SCP) hereby submits this response to the Application of Pacific Gas and Electric Company (PG&E) for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2017 (Application). Rule 2.6(a) requires that protests and responses be filed within 30 days of the date the notice of the filing of the application first appears in the Commission's Daily Calendar. Notice of the instant Application first appeared on September 3, 2015. As October 3, 2015, was a Saturday, this response is timely filed on Monday, October 5, 2015.

I. IDENTITY OF SONOMA CLEAN POWER

SCP is a public agency that operates a voluntary Community Choice Aggregation (CCA) program for electricity customers living in Sonoma County, which is within PG&E's service territory. SCP's CCA program allows electricity customers the opportunity to join together to procure electricity from competitive suppliers, providing its customers with stable and competitive electric rates, supporting Sonoma County's economy by developing local jobs in renewable energy and energy efficiency and reducing greenhouse gas emissions related to use of power in Sonoma County.

II. BASIS FOR INTEREST IN A.15-09-001

In its Application, PG&E proposed to increase its gas and electric distribution and generation base revenue requirements by a total of \$457 million, effective January 1, 2017, as compared to 2016 adopted revenues, a 2.5-percent increase over the 2016 adopted total combined gas and electric revenue of \$18.091 billion.¹ Of this \$457 million increase, \$164 million is for electric distribution and \$208 million is for electric generation.² In addition, PG&E requested total increases of \$489 million and \$390 million, respectively, for 2018 and 2019.³

Since SCP customers continue to pay PG&E distribution and related charges, SCP has an interest in ensuring that PG&E's requests for distribution revenue requirement increases are fair and justified, since they will ultimately be reflected in PG&E's rates for SCP customers. In addition, with respect to the generation component of rates, SCP is in direct competition with PG&E. Therefore, SCP has an interest in ensuring that the generation revenue requirement fairly reflects PG&E's generation-related costs.

SCP continues to review PG&E's Application and associated testimony, and may submit data requests to PG&E for further information, in order to fully understand PG&E's proposals. Depending on SCP's findings, SCP may wish to submit testimony, comments, briefs and/or other filings in this proceeding to contest particular elements of PG&E's Application.

III. CATEGORIZATION OF PROCEEDING, NEED FOR HEARINGS AND PROPOSED PROCEDURAL SCHEDULE

SCP agrees that this proceeding should be categorized as a ratesetting and expects that evidentiary hearings may be required. At this time, SCP has no objections to PG&E's proposed

¹ PG&E Application at 1-2.

² PG&E Application at 4-5.

³ PG&E Application at 3.

procedural schedule, which includes time for hearings, as necessary. In addition, SCP supports the inclusion of public workshops within the schedule.

IV. COMMUNICATIONS AND SERVICE

For the purpose of receipt of all pleadings, orders, notices, and any other communications and correspondence in this proceeding, the following representative of SCP should be placed on the service list as a “Party”:

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V. CONCLUSION

SCP appreciates the opportunity to submit this response and looks forward to continued participation in this proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tim Lindl', with a stylized flourish at the end.

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Dated: October 5, 2015