

June 21, 2017  
South Bay Clean Power Working Group  
Redondo Beach, CA



**Re: Draft Business Plan**

Dear South Bay Clean Power (SBCP) Working Group,

The [California Alliance for Community Energy](http://www.cacommunityenergy.org) applauds the [SBCP Draft Business Plan](#) as representing an important contribution to the development of Community Choice energy programs in California.

The Alliance is a statewide coalition of organizations, initiatives, and individuals that supports and defends Community Choice energy programs in California that advance local clean energy for the environmental, economic, and social justice benefit of our communities.

The SBCP Plan provides a framework for achieving a set of goals strongly aligned with the mission of the Alliance, namely a strong emphasis on distributed energy resource (DER) development, with a focus on local economic development, jobs and workforce development, and economic and environmental justice.

In particular, the SBCP Plan proposes energy services capability and an organizational structure that would enable SBCP to promote DER development, making SBCP the central engine—the DER aggregator—for developing and integrating a variety of distributed energy resources (energy efficiency, local renewable generation, energy storage, demand response technologies, electric vehicle infrastructure, and so forth). Developing and integrating these resources is key to optimizing electricity services to consumers and meeting SBCP’s community benefit goals.

In addition, the Plan’s proposed services and organizational structure would allow SBCP to act as a scheduling coordinator for DER, integrating DER procurement into SBCP’s short-term and long-term procurement operations and providing stability and reliability to the SBCP program.

Key to supporting this DER development platform is the Plan’s call for a comprehensive and integrated set of energy services and risk management capabilities that matches that of established utilities. Unlike most Community Choice programs currently in operation or on the drawing boards, the Plan calls for advanced power management capability (power market operations/ risk management/ long-term planning) from the start of the Community Choice program.

This power management capability provides for integrating DER into energy portfolio planning, load forecasting, energy procurement, contract management, energy market operations, financial settlements, customer outreach, data management, and billing activities.

These comprehensive services also help enable a Community Choice program—apart from DER development in particular—to operate over the long term in a volatile energy market and an uncertain regulatory environment. Given the CPUC’s antagonism to Community Choice and its claims that Community Choice programs lack the operational sophistication of utilities, the SBCP Plan addresses a serious shortcoming of most existing Community Choice programs.

Sincerely,

A handwritten signature in black ink, appearing to read "Al Weinrub".

Al Weinrub  
Coordinator, California Alliance for Community Energy