

November 25, 2015

President Michael Picker
Commissioner Mike Florio
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102



RE: The Power Charge Indifference Adjustment Proposed Increase in A.15-06-001

Dear Mr. Picker and Mr. Florio,

For over eighty years the Marin Conservation League (MCL) has worked to preserve and protect the natural resources of Marin County. MCL has supported Marin Clean Energy since before its inception as an important ally in our efforts to mitigate the impacts of climate change.

MCL is concerned that the proposed 95% increase of the Power Charge Indifference Adjustment (PCIA) exit fee, charged to Community Choice Aggregation (CCA) customers in Application 15-06-001, will profoundly impact Marin's customers of Marin Clean Energy (MCE), California's first CCA program.

Over the past two years, MCE customers have collectively paid **more than \$32 million** in PCIA fees. MCE customers are projected to pay more than \$30 million in PCIA fees in 2016 alone, without including the latest proposed increases submitted by Pacific Gas & Electric (PG&E). In addition, PG&E is currently seeking to retire an account with \$1 billion in excess PCIA fees. We urge the Commission to consider using a small portion of this account to offset PCIA fees charged to CCA customers.

At a larger level, the fairness and reasonableness of the PCIA fee and how it is applied to CCA customers must be examined. In Decision 12-01-033, the Commission found that PG&E did not properly plan for the loss of CCA electric load. This poor planning inflates the PCIA costs that CCA customers must pay. The PCIA methodology most heavily impacts residential customers. Moreover, PG&E is the only utility in the state to levy PCIA fees on customers of the utility bill discount program California Alternate Rates for Energy (CARE). CARE customers throughout MCE service territory are projected to pay more than \$2 million in 2016 with the proposed 95% increase to the PCIA.

Marin County's citizens have led the state in achieving Governor Brown's ambitious renewable energy goals. They should not be penalized for being the early adopters of innovative renewable energy programs. We therefore respectfully urge the California Public Utilities Commission to reject PG&E's proposed increase and apply a portion of the excess PCIA fee \$1 billion account towards PCIA fees for CCA customers.

Sincerely,

Kate Powers, President

cc: Senator Mike McGuire
Assemblymember Marc Levine

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