



November 16, 2017

The San Diego Community Choice Alliance (SDCCA) and its members agree with the recommendations in Attachment 3 of the SEAB CCA Comment Paper as was authored by the SEAB working group. Supplementary to these recommendations SDCCA suggests that the following be considered as additional recommendations from SEAB to the City of San Diego, Mayor and Council:

1) The City of San Diego create a CCA business plan as the next step to achieving 100% renewable energy by 2035:

The working group has concluded that the feasibility study, “finds that it is feasible that a CCA will be able to meet SEAB’s minimum performance criteria for all areas included in the scope of the study including greenhouse gas reductions, increased use of renewable energy for electricity production, financial stability and reliable solvency, and local economic benefits.” Following the conclusion that the feasibility study demonstrates that a CCA could feasibly meet the minimum performance criteria established by SEAB and acknowledging that the study is a high level assessment the working group states that a “formal business plan and implementation strategy, which generally follow a decision to proceed with CCA development, are the appropriate venues to dig into the specifics of governance structure, financing, customer rollout and programming requirements.” Based on the conclusions of the SEAB working group, and following the precedent of steps taken in the establishment of operational CCA’s, SDCCA suggests that SEAB explicitly make a recommendation for the City to proceed with the creation of a formal CCA business plan. The formation of a business plan will establish in greater detail how a CCA would feasibly achieve the City’s commitment to attaining a 100% renewable energy supply by 2035 and help resolve issues identified for further clarification by the SEAB working group.

2) The City establish a timeline that outlines the steps needed and timeframe required to create a CCA business plan:

It is important that the City outline the steps needed for creating a CCA business plan and establish timeframes that benchmark each important milestone that will lead to the timely completion of the business plan. Through the adoption of its Climate Action Plan (CAP) the City of San Diego has made a legally binding commitment to achieving a supply of 100% renewable energy by 2035. Fulfilling this commitment is an ambitious goal with a short time horizon that the City can not delay in achieving. SDCCA acknowledges that there are potential risks in establishing a CCA, but firmly believes these risks can be prudently addressed in detail through the development of a formal CCA business plan. Without taking bold action to achieve the goals laid out in the CAP the City risks not meeting the legal, environmental and moral obligations the City has committed to as part of that document and leaves itself vulnerable to the "business as usual" remotely controlled CPUC and IOU process.

3) Create a process and schedule for public and stakeholder input on the creation of a CCA business plan:

As the establishment of a CCA is an undertaking that has the potential to substantially benefit the public and numerous stakeholders in the community it is important to ensure that all interested parties have adequate opportunity to provide input and feedback into the development of a CCA business plan. Local control is one of the central benefits of a CCA and ensuring that all stakeholders have ample opportunity to help shape priority programs and provide input to the direction of the business plan is crucial. Additionally, as the business plan will serve as a blueprint and guiding document for establishing longstanding and foundational policies of a CCA it is imperative to gather adequate public input in the early stages of developing a business plan. The period of public comment should fit into a reasonable period of time that supports the timeline that the City establishes for the completion of a CCA business plan.