



® April 12, 2017

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The Honorable Bob Wieckowski, Chair  
Senate Environmental Quality Committee  
California State Senate, Room 2205  
Sacramento, CA 95818

**Re: SB 618 (Bradford) – Load-serving entities: integrated resource plans  
As Introduced February 17, 2017 – OPPOSE  
Set for hearing on April 19, 2017 – Senate Environmental Quality Committee**

Dear Senator Wieckowski:

The California State Association of Counties (CSAC) writes to respectfully express our opposition to SB 618, by Senator Steven Bradford, a measure related to Community Choice Aggregation (CCA) and Integrated Resources Plans. Specifically, this bill would vest the California Public Utilities Commission (CPUC) with authority to approve or disapprove a CCA's Integrated Resource Plan beyond assuring compliance with the requirements of state law. CSAC believes this would unduly interfere with the ability of CCAs to locally control electricity procurement, subject to state mandates applicable to all load serving entities.

CCAs are local, non-profit agencies that are formed to respond to and invest in the needs of their communities. They are established by local governments to advance local policy priorities including procuring GHG-free renewable energy beyond the renewable portfolio standard, providing ratepayers with energy choice, providing less expensive energy and creating local programs for energy efficiency, storage and distributed generation, all while exercising local control over energy procurement. CCAs are formed to take on the decision-making role about sources of energy for electricity generation – greener, cleaner energy. We believe this bill would hamper this process by giving the CPUC control over a CCA's Integrated Resources Plan (IRP).

Furthermore, SB 350 became effective law on January 1, 2015, only 14 months ago. The CPUC is still in the process of implementing the CCA IRP process as directed in SB 350. Thus, nothing has occurred since the passage of SB 350 that would warrant a change to the CCA IRP process established in SB 350.

It is for these reasons that we must respectfully oppose this bill. Should you have any questions regarding our position, please contact me at 916-327-7500, ext. 504, or [cmartinson@counties.org](mailto:cmartinson@counties.org).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Cara Martinson'.

Cara Martinson  
Legislative Representative

Cc: The Honorable Steven Bradford  
Members, Senate Environmental Quality Committee  
David Garcia, Consultant, Senate Environmental Quality Committee  
Morgan Branch, Consultant, Senate Republican Caucus