

**REGULAR MEETING of the Executive Committee of the
Clean Power Alliance of Southern California
Wednesday, May 16, 2018
1:30 p.m.**

555 West 5th Street, 35th Floor
Los Angeles, California 90013

*Ventura County Hall of Administration
4th Floor Channel Island Conference Room
800 South Victoria Avenue
Ventura, CA 93009*

*Beverly Hills City Hall
455 N. Rexford Drive 4th Fl, Conference Rm.4B
Beverly Hills, CA 90210*

I. WELCOME AND ROLL CALL

II. PUBLIC COMMENT

This item is reserved for persons wishing to address the Committee on any Clean Power Alliance-related matters not on today's agenda. Public comments on matters on today's agenda shall be heard at the time the matter is called.

III. REGULAR AGENDA

1. Approve Minutes from April 18, 2018 Executive Committee Meeting
2. Review Draft Agenda for June 7, 2018 Board of Directors Meeting
3. Discuss Draft Letter to Legislators Regarding Regulatory Issues
4. Discuss June 22, 2018 Board Retreat

Clean Power Alliance Executive Committee Meeting Agenda
May 16, 2018

IV. CLOSED SESSION

1. PUBLIC EMPLOYMENT
(Government Code Section 54857)
Recruitment of General Counsel

V. COMMITTEE MEMBER COMMENTS

VI. ADJOURN

**REGULAR MEETING of the Executive Committee of Clean Power
Alliance of Southern California**

**Wednesday, April 18, 2018
1:30 p.m.**

555 West 5th Street, 35th Floor
Los Angeles, California 90013

Ventura County Hall of Administration
CEO Channel Island Conference Room
800 South Victoria Avenue
Ventura, CA 93009

MINUTES

I. WELCOME AND ROLL CALL

Secretary Betha (Pronounced Bethay) conducted roll call.

Roll Call				
1	Beverly Hills	Julian Gold	Director	Present
2	Hawthorne	Angie Reyes English	Director	Present
3	LA County	Gary Gero	Alternate	Present
4	Oxnard	Carmen Ramirez	Director	Remote
5	Rolling Hills Estates	Steve Zuckerman	Director	Present
6	South Pasadena	Diana Mahmud	Chair	Present
7	Ventura County	Linda Parks	Director	Remote
8	West Hollywood	Lindsey Horvath	Director	Present

II. PUBLIC COMMENT

There were no public comments either in person or at a remote meeting location.

III. EXECUTIVE DIRECTOR COMMENTS

Ted Bardacke turned the floor over to Chair Diana Mahmud, who provided the following comments:

1. Chair Mahmud stated what her goals for the meetings would be in terms of length of meeting time, and detailed information to be forthcoming for other board members.
2. Committee members hopefully, will be a resource for other board members who have questions regarding information discussed at the meetings.
3. Chair Mahmud extended an open invitation for any board member who wishes to attend, to do so. However, their participation would be in a limited capacity. The thought of disclosure agreements was considered.

Ted Bardacke announced that he had comments for three items:

1. Hiring Update – Welcome Monique Edwards, Director of Technology Integration and Data Analytics, and also Jennifer Ward, Head of Local Government Affairs, both to come onboard later this month.
2. Update on April 17, 2018 Procurement Status – Close to securing staff. May have to outsource some parts. Signed contracts with 5 suppliers for fixed blocks of energy. Competitive offers for renewable energy and low carbon energy. Main supplier for renewable energy right now is PG&E. There is a challenge with 2018 RA. Most of the RA is held by PG&E or Edison. Issue a new RFO for 2018 RA only.
3. Update on Communications Strategy and Outreach – Meaghan Lavery, Program Manager, and Craig Perkins, Executive Director, from The Energy Coalition participated in the meeting and Meaghan provided a presentation. Handouts were distributed to Committee members and they discussed official notices, co-branding, website launch timeline, and what the website will look like in various forms, ex: mobile and desktop.

IV. REGULAR AGENDA

1. Review Draft Agenda for May 2, 2018 Board Meeting:

The Committee reviewed and discussed the draft agenda for the May 2, 2018 Board Meeting, including:

- a) Amend Bill Carnahan Consulting Contract from County Employee to CPA Consultant.
- b) Signed contract with Stephen Hall from Troutman Sanders.

2. Discuss Board Member Expense Reimbursement Policy:

The Committee discussed a policy for Board Member expense reimbursement, including:

- a) Proposal for reimbursement. If asked to represent CCA, then reimbursement for travel expenses such as airfare, lodging, parking, and mileage, per radius.

3. Discuss Options for Ex Parte Communications Policy

The Committee discussed guidelines for meeting with potential procurement proposers. They discussed how to vet meeting requests. There should be disclosures related to Board Members communicating on behalf of Clean Power Alliance. Have counsel provide summary of what is/not permitted under the County policy.

4. Discuss Bylaws Development Schedule

The Committee discussed a timeline for developing Bylaws for the Alliance.

V. LEGISLATIVE AND REGULATORY UPDATE

A brief update on legislative and regulatory issues was provided.

VI. BOARD MEMBER COMMENTS

Board members provided updates and general comments to the Committee.

VII. CLOSED SESSION

The Committee entered closed session. No action was taken.

VIII. ADJOURN – The Committee adjourned to May 16, 2018.



Staff Report – Agenda Item 2

To: Clean Power Alliance Executive Committee

From: Ted Bardacke, Executive Director

Item 2: Review Draft Agenda for June 7, 2018 Board of Directors Meeting

Date: May 16, 2018

BACKGROUND

In addition to reviewing the draft Board Agenda, staff would like to discuss and receive specific feedback on Agenda Items 6 and 7, using the discussion below and attached materials.

BOARD AGENDA ITEM 6

As discussed at the May 2, 2018 Board meeting, CPA's Integrated Resource Plan (IRP) is due to the California Public Utilities Commission (CPUC) on August 1, 2018. While development of an IRP typically takes 9 – 12 months, the IRP project team has developed a 3-month work plan to complete the process. This process will include extensive review by the Board's Energy Committee and a community meeting to seek public input.

Based on the work plan and because the CPUC has still not finalized all the rules and requirements for the IRP filing, staff does not anticipate having the final IRP ready by the July 12, 2018 Board meeting. While the full Board will be able to review the major IRP components at that meeting, the IRP project team would like the opportunity to incorporate Board feedback and will need the remaining two weeks of July to make final modifications to ensure compliance with the August 1, 2018 deadline.

The IRP project team is therefore proposing that, at the upcoming June 7, 2018 meeting, the full Board delegate authority to approve the final IRP. The options for delegation include:

- 1) Energy Committee – This committee will be very engaged throughout the IRP process has a scheduled meeting on July 25.
- 2) Executive Committee – This committee would provide a higher level of delegated authority. However, their regularly scheduled meeting is on July 18, thus only providing an extra few days after the July 12 Board meeting.

- 3) Some combination of the Executive Committee and the Energy Committee, possibly at a joint meeting on July 25.
- 4) Executive Director – While this option provides the most flexibility and time, because the IRP is both a policy and compliance document, it is not recommended.

Staff would like guidance from the Executive Committee as to the preferred delegation of authority option.

BOARD AGENDA ITEM 7

See presentation on the following pages for discussion.

Attachment: Board Materials

**REGULAR MEETING of the Board of Directors of the
Clean Power Alliance of Southern California
Thursday, June 7, 2018
2:00 p.m.**

Los Angeles County Hall of Administration
Room **TBD**
500 West Temple Street
Los Angeles, California 90012

*Calabasas City Hall – Council Conference Room
100 Civic Center Way, Calabasas, CA 91301*

*Ventura County Hall of Administration – 4th Floor Channel Island Conference Room
800 South Victoria Avenue, Ventura, CA 93009*

*City of Whittier – Admin. Committee Room
13230 Penn Street, Whittier, CA 90602*

I. WELCOME AND ROLL CALL

II. PUBLIC COMMENT

This item is reserved for persons wishing to address the Board on any Clean Power Alliance-related matters not on today's agenda. Public comments on matters on today's agenda shall be heard at the time the matter is called.

As with all public comment, members of the public who wish to address the Board are requested to complete a speaker's slip and provide it to Clean Power Alliance staff. Speakers are customarily limited to two minutes, but an extension can be provided at the discretion of the Board Chair.

Clean Power Alliance Board Meeting Agenda
June 7, 2018

III. CONSENT AGENDA

1. Approve Minutes from April 5, 2018 Board of Directors Meeting
2. Approve Minutes from May 2, 2018 Board of Directors Meeting
3. Approve Master Agreement for Pre-Qualified Providers to Provide Goods and Services
4. Approve Designation of Ted Bardacke as Treasurer for Clean Power Alliance
5. Approve Customer Privacy Policy

IV. REGULAR AGENDA

6. Discuss Delegation of Authority Regarding Integrated Resource Plan
7. Approve Fiscal Year 2018-2019 Budget
8. Approve Formation of Community Advisory Committee and Authorize Staff to Open Application Process for Committee Membership

V. LEGISLATIVE AND REGULATORY UPDATE**VI. EXECUTIVE DIRECTOR REPORT****VII. BOARD MEMBER COMMENTS****VIII. REPORT FROM THE CHAIR****IX. ADJOURN – TO JULY 12, 2018**

Clean Power Alliance Board Meeting Agenda
June 7, 2018

Public records that relate to any item on the open session agenda for a regular board meeting are available for public inspection. Those records that are distributed less than 72 hours prior to the meeting are available for public inspection at the same time they are distributed to all members, or a majority of, the members of the Board. The Board has designated the County of Los Angeles, Chief Sustainability Office, Kenneth Hahn Hall of Administration, Room 493, 500 West Temple Street, Los Angeles, CA 90012, for making those public records available for inspection. The documents are also available on our internet website at www.cleanpoweralliance.org.



FY 18/19 Budget Preview

Constraints, Format, Scenarios

Overview

1. With extension of LA County Loan and approval of River City RLOC, CPA's cash position, including credit, appears stable for FY 18/19
2. CPA has varying degrees of control/influence over major budget items during start-up year – affects margins, reserves, and loan covenants
3. FY 18/19 budget format allows for flexibility due to changing circumstances
4. Staff is building various scenarios to minimize impacts of surprises

What we can and can't control

Little Control	Some Control	More Control
Power Prices	Rates (Revenue)	2019 Phasing
PCIA/PAM Decision	Opt-outs (Revenue)	Operating/G&A Expenses
SCE Billing System Issues	Interest Costs and Income	Team Make-Up
	Loan Covenants	

FY 18/19 Budget – Major Categories

- Total Revenues – Sales less uncollected accounts (X%)
- Energy Costs
- Interest Costs and Interest Revenue
- Operating/GA Expenses, including:

Staffing/Benefits	Legal
Technical Consultants	Operating Consultants (Scheduling Coordinator/Data Management)
SCE/CPUC/Customer Notification Fees	IT Equipment, Cybersecurity, Audits
Memberships (esp. CalCCA), Sponsorships, Events	Board and Staff Travel
Insurance	Office Space and Expenses

FY 18/19 Budget – Key Metrics

- Program Surplus/(Deficit)
- Reserves
- Total Cash Balance
 - includes Credit Availability and Lockbox Minimum Balances
- EBITDA
- Debt Service Coverage Ratio
- Gross Margin
- Energy Cost/Total Cost

Scenarios

- Best/Conservative/Worst for PCIA/PAM
- 2019 Phasing Scenarios
- 20% delayed SCE bills as base case
- Focus G&A on major business items – power procurement, revenue recognition, marketing (to minimize opt-outs)
- Weekly staff scenario check-ins – monthly budget variance reporting
- Rate setting for 2019 is a key variable for Board consideration

Staff Report – Item 3

To: Clean Power Alliance Executive Committee

From: CPA Staff

Subject: Discuss Draft Letter to Legislators Regarding Regulatory Issues

Date: May 16, 2018

RECOMMENDATION

Staff is seeking feedback on the attached draft letter to legislators representing CPA member jurisdictions regarding criticisms of Community Choice Aggregators (CCAs) by the CPUC President.

BACKGROUND AND DISCUSSION

In a number of fora over the past few months, the President of the California Public Utilities Commission (CPUC), through both public statements and via the release of a draft white paper, has called for a new electricity market regulatory regime to deal with the rise of customer choice. Several times he has claimed that the rise of CCAs is creating a risk of a new energy crisis.

CalCCA has responded to these statements and the paper in two ways. First it issued the following statement:

Highly Regulated CCAs Weigh In on CPUC White Paper

Following today's release of a CPUC white paper, "California Customer Choice: An Evaluation of Regulatory Framework Options for an Evolving Electricity Market," that wrongly asserts today's energy system lacks regulation and adequate planning, Beth Vaughan, the executive director of CalCCA issued the following statement:

"Highly regulated locally controlled CCAs were designed to help correct the problems from the energy crisis and they are performing as intended – delivering reliable, affordable and clean energy to local customers, while exceeding the state's GHG goals.

"It is important to recognize in this report, that other states use energy choice program models that differ widely from those used by CCAs in California.

"CCAs take seriously their obligation to meet California's rules to 'keep the lights on'. CCAs are building their localized programs for the long term, with a commitment to reliability, affordability, decarbonization and social equity.

"We are carefully reviewing the content of the draft paper and will provide our comments by the June 4th deadline."

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Second, CalCCA wrote a letter to "friendly" legislators who had protested the CPUC's Resolution E-4907. This letter aggressively criticized CPUC President Picker and was distributed mostly to Northern California legislators, as they were the predominant signatories of the E-4907 protest letter.

CPA staff, in consultation with the Board Chair and the Chair of the Board's Legislative Committee, believe this is a good opportunity to address each of CPA's State Senate and Assembly Representatives and seek collaboration while cautioning them against accepting allegations about reliability that are not based on fact should the Legislature decide to discuss new regulations for CCAs. This would complement the district meetings with legislators that staff is organizing and that have been attended by individual Board members.

Attachments: Draft Letter to Legislators Regarding Regulatory Issues

CalCCA Letter to Legislators



COUNTY OF
LOS ANGELES

May 11, 2018

COUNTY OF
VENTURA

Dear Senators and Assemblymembers:

AGOURA HILLS

ALHAMBRA

ARCADIA

BEVERLY HILLS

CALABASAS

CAMARILLO

CARSON

CLAREMONT

CULVER CITY

DOWNEY

HAWAIIAN
GARDENS

HAWTHORNE

MALIBU

MANHATTAN
BEACH

MOORPARK

OJAI

OXNARD

PARAMOUNT

REDONDO BEACH

ROLLING HILLS
ESTATES

SANTA MONICA

SIERRA MADRE

SIMI VALLEY

SOUTH PASADENA

TEMPLE CITY

THOUSAND OAKS

VENTURA

WEST HOLLYWOOD

WHITTIER

The Clean Power Alliance of Southern California is the State's newest Community Choice Aggregation Joint Powers Authority, made up of 31 local agencies across Los Angeles and Ventura Counties. These agencies have banded together to provide cleaner electricity at competitive rates, offering a choice in electricity service providers for the first time to nearly 3 million residents in our region.

Over the past several weeks, the President of the California Public Utilities Commission has made several statements to the legislature and at CPUC meetings claiming that the rise of CCAs is creating a risk of a new electricity reliability crisis. Earlier this month, his office also distributed a draft white paper on the future of electricity regulation in an era of customer choice that portrayed CCAs as a problem to be dealt with rather than an opportunity to be grasped.

While we agree that the regulatory landscape for electricity is changing and that new frameworks for collaboration across multiple actors in California could be beneficial, we would caution against paying much heed to allegations about reliability that are not based on fact. Specifically, we would like to point out that CCAs across California have and continue to meet their Resource Adequacy requirements; as it ramps up service, Clean Power Alliance intends to do the same and seeks to collaborate with the Investor Owned Utilities, Publicly Owned Utilities, the California Independent System Operator and state regulators to provide the reliable electricity system our constituents expect and deserve.

The legislature promoted the creation of CCAs in the wake of the last energy crisis as a way to reduce volatility in the energy market. By introducing a level of public oversight at the local level, accountability increases and risky market manipulation is discouraged. In the meantime, Clean Power Alliance already expects to meet the 2030 state mandate of 50% renewable energy content in 2019, eleven years early than required. This voluntary action is also the kind of leadership our local communities can provide by engaging closely with our customers and leveraging our collective purchasing power.

Page 2

May 11, 2018

In summary, we expect that as we collectively pursue greenhouse gas reduction in the electricity sector in a decentralized manner that is affordable, reliable and fair to all customers, calls for new legislation and regulatory action will increase. We urge you to communicate with us to make sure you have all the facts and perspectives at your disposal and pledge to work closely with you to meet our mutual goals for the State and our local communities.

Sincerely,

Diana Mahmud
Chair, Clean Power Alliance
Councilmember, City of South Pasadena

Sheila Kuehl
Vice-Chair, Clean Power Alliance
Supervisor, Los Angeles County

Linda Parks
Vice-Chair, Clean Power Alliance
Supervisor, Ventura County

Lindsey Horvath
Chair, Legislative Committee, Clean Power Alliance
Councilmember, City of West Hollywood

Ted Bardacke
Executive Director, Clean Power Alliance



Apple Valley Choice Energy

Clean Power Alliance

CleanPowerSF

Desert Community Energy

East Bay Community Energy
Authority

Lancaster Choice Energy

MCE

Monterey Bay Community
Power Authority

Peninsula Clean Energy

Pioneer Community Energy

PRIME

Redwood Coast Energy
Authority

San Jose Clean Energy

Silicon Valley Clean Energy
Authority

Sonoma Clean Power

Valley Clean Energy Alliance

May 10, 2018

Dear Senators and Assemblymembers:

The California Community Choice Association (CalCCA) thanks you for the leadership you demonstrated in December when you wrote to the California Public Utilities Commission (CPUC) with concerns about the its draft resolution E-4907 to change the Community Choice Aggregation (CCA) registration process. The CPUC's draft resolution proposed a de facto freeze on expansion and development of new CCAs statewide, on grounds that CCAs were not meeting California's Resource Adequacy requirements, creating a reliability crisis.

Citing an alleged urgency, the CPUC chose to pursue its de facto freeze via an unorthodox, non-transparent and rushed resolution process, rather than with a normal proceeding. Following assertions by CPUC President Picker that CCAs were failing to meet California's Resource Adequacy requirements, the CPUC Energy Division issued the draft resolution including these claims on electric reliability issues for comment December 8, 2017.

On behalf of CalCCA, which represents the interests of California's community choice electricity providers in the legislature and at the state regulatory agencies, we would like to note that despite what has been recently claimed at the CPUC, CCAs are driving real change in demonstrable and verifiable ways:

1. CCAs are meeting resource adequacy requirements.
2. CCAs are driving California toward decarbonization faster than state mandates using voluntary action precisely as AB 32 envisioned, including over 1100 MW of new, renewable generation contracted for 10 years or more.
3. CCAs are proposing fixes to California's nonbypassable charge framework in ways that save all energy consumers approximately \$700 million while also creating a durable framework for continued CCA growth.

CPUC Draft Resolution E-4907

Despite CCA's verified impacts, in public settings leading up to the publication and adoption of the Resolution E-4907, President Picker made some inaccurate claims about the role that CCAs were playing with respect to the state's grid reliability, specifically, and deregulation of the electricity market. Many of these statements can be found in the attached document.

*Advancing local
energy choice*

Here are three excerpts from the February 8, 2018 voting meeting:

“... [CCAs are] not able to fully provide that resource adequacy...”

“... a voltage collapse, a voltage surge will travel to non-CCA cities.”

“... [CCA] fail to actually provide absolutely critical services to their customers and to endanger their neighbors...”

These claims were made despite lack of supporting evidence. Commissioner Guzman Aceves stated that CCAs are complying with Resource Adequacy requirements at the same February 8th CPUC voting meeting. (Id., hour 2:09:52.)

Contrary to the many assertions made at this CPUC meeting and others, all operating CCAs have met all resource adequacy requirements set by the CPUC. This is supported by a statement from the CPUC Energy Division staff noting that none of the eleven load serving entities that requested waivers to meet their 2018 resource adequacy obligations were CCAs. It is important to note that waivers can be necessary in California's constrained local capacity market where the two largest electric investor owned utilities have contracted capacity in excess of their needs, and until recently, did not make that capacity available to the market.

There is a standard of care and an expectation that California's appointed officials will make decisions on behalf of Californians based on thoughtful collection and deliberation of the facts. To make California's policies work, we need data and collaboration, not unsubstantiated urgency.

The CPUC is in the position to know the facts of our state's complex electricity sector, and particularly the details of waivers the agency has under its own review and approval. It is a reasonable expectation for legislators, energy consumers and stakeholders to rely on statements made by officials with the facts. But the CPUC's Resource Adequacy emergency resolution and the draft report it released indicate the need for skepticism and careful vetting of information from the CPUC concerning CCAs.

Report on California Customer Choice

On May 3rd, the CPUC issued its draft report “California Customer Choice: An Evaluation of Regulatory Framework Options for an Evolving Electricity Market,” claiming that publicly-administered community choice programs and rooftop solar could cause the state's next energy crisis. But CalCCA urges you to consider the following:

- CCAs were created by the legislature in the wake of the energy crisis as part of the solution, to reduce volatility in the energy market.
 - The concern at the time was that energy markets were fraught with gaming and poor management. By introducing public oversight, the legislature



hoped that CCAs would bring a mature and careful approach to protecting ratepayers against risky practices.

- The track record of CCAs in providing lower cost electricity with reduced greenhouse gas emissions and more renewables, with over 1100 MW of new renewable generation contracted for 10 years or more, is exceptional.
- A story not often heard is how CCAs are reducing ratepayer exposure to market changes with more careful procurement. The CPUC's draft report focuses on reliability as a key concern, but doesn't include input from the California ISO, which is responsible for system reliability.

The draft report reveals the CPUC's fears about losing regulatory control to community choice programs and our own governing boards, which consist of locally-elected officials. Most importantly, the report does not identify specific problems with CCAs that need to be solved. Instead, it makes erroneous assertions and may be used to justify regulatory action against CCAs. When issues do arise, CalCCA will – and already does – engage fully with both regulators and legislators to address them with solutions based on facts and data, not fallacious arguments.

Inaccurate claims that CCAs are acting irresponsibly are simply not based on reality and call into question the CPUC's ability to be a neutral and unbiased regulator on matters impacting CCAs.

As calls for legislation grow louder, we urge you to continue working closely with us. We thank you again for your leadership in helping us resolve Resolution E-4907 and we look forward to continuing to work with you as we move toward a positive, responsible transformation of the retail electricity market, community by community, and meet our mutual goals for CCA communities and the State.

Sincerely,



Dawn Weisz
President



Geof Syphers
Vice President

Attachment

President Picker's Claims Before the Senate Energy, Utilities and Communications Committee (August 2017)

1. "What we do know is that the electric industry is once again being deregulated. In 1998 it was by design discussed and adopted by the legislature. Now, we're being deregulated by technology, whole range of choices made in different forums that are not necessarily connected. We're being deregulated from the bottom up...Very important in that is reliability. How do we deal with reliability across all these different players? How do we fairly allocate the costs?"
2. "Ed [Randolph] is going to take you through what we learned in our community choice aggregation workshop. I just wanted to give you a sense that the problem is worse than you think."

(Senate Energy, Utilities and Communications Committee, Wednesday, August 23, 2017, President Picker introductory remarks, see hours 0:10:41, 0:11:35, 0:12:55).

President Picker's Claims at the CPUC (October 2017 & February 2018)

- "We are right at the crisis point, because largely smaller LSEs, whether they are ESPs providing Direct Access or the CCAs, bid short term contracts in the RA market, and they are all reporting that they are not getting bid responses, and in some places there is just no bid response at all. So we are right there at that point; so this is why I keep focusing on reliability issues. You know, many of these smaller providers clearly cannot do that, it is either because they don't have the market weight to attract bids, or because they are somehow sending signals they are not capable of paying the costs, so what do we do? Do we step in with some emergency rule and order them to then buy that from the incumbent utilities? That certainly will disturb their current market pricing and they won't start to look so cheap. What do we do?" (California Public Utilities Commission California Customer Choice Workshop, October 31, 2017, see hour 6:56:49.)

In the CPUC's voting meeting on February 8th, President Picker again made claims about CCAs and Resource Adequacy that were not based on facts:

- "... it's more than just cost shifting..." (Public Utilities Commission of the State of California, Public Agenda 3412, February 8, 2018, Item 9, see hour 2:02:35 at http://www.adminmonitor.com/ca/cpuc/voting_meeting/20180131/.)
- "... [CCAs are] not able to fully provide that resource adequacy..." (Id., hour 2:03:05.)
- "... not having that assurance before people embark, even as local governments, to provide electricity to folks has implications not only for their customers but for their neighbors." (Id., hour 2:03:14.)

- “... a voltage collapse, a voltage surge will travel to non-CCA cities.” (Id., hour 2:03:40.)
- “[For CCAs to] hold themselves out as partners in the statewide electrical grid without being able to provide us that assurance of reliability. It really makes me nervous, and it makes me wonder sometimes whether people are fully prepared to embrace this responsibility.” (Id., hour 2:03:58.)
- “... [CCA] fail to actually provide absolutely critical services to their customers and to endanger their neighbors...” (Id., hour 2:04:29.)