



## **REDWOOD COAST ENERGY AUTHORITY 2024 POLICY PLATFORM**

### **INTRODUCTION**

---

Redwood Coast Energy Authority (“RCEA”) is a joint-powers authority of the cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell, Trinidad, the Yurok Tribe, Blue Lake Rancheria, County of Humboldt, and the Humboldt Bay Municipal Water District. The mission of RCEA is to develop and implement sustainable energy initiatives which reduce energy demand, increase energy efficiency, and advance the use of clean, efficient, and renewable resources available in the region for the benefit of the Member agencies and their constituents.

This Policy Platform serves as a guide for regulatory and legislative engagement which is based on principles set forth in RCEA’s RePower Humboldt strategic plan. To review RCEA’s strategic plan, please see <https://redwoodenergy.org/wp-content/uploads/2020/06/RePower-2019-Update-FINAL-.pdf>

This platform will be brought to the RCEA Board on an annual basis for review and input.

---

### **AVENUES AND EXAMPLES OF ADVOCACY**

Legislation and regulation are two distinct, but related, policy tools. Legislation sets principles of public policy, while regulation implements these principles and brings legislation into effect.

Examples of RCEA legislative advocacy include submitting letters in support or opposition of specific bills, as well as meeting with legislators in the California State Senate, the California State Assembly, U.S. House of Representatives, and U.S. Senate.

Most of RCEA’s regulatory engagement takes place through the California Public Utilities Commission (“CPUC”), the primary State agency responsible for executing legislation and issuing regulations pertinent to Community Choice Aggregation (“CCA”) operations. However, RCEA’s operations are also impacted by other state and federal agencies including but not limited to the California Energy Commission, the California Air Resources Board, the Federal Energy Regulatory Commission, and the federal Bureau of Ocean Energy Management. Each of these agencies develop and implement regulations that are of interest to RCEA. Examples of advocacy in this sphere include meeting with agency staff, agency decision-makers, and submitting comments in response to regulations.

## PROCEDURES

---

**Regulatory Engagement:** RCEA regulatory engagement at the CPUC and other agencies is conducted at the staff level under the authority of the Executive Director in a manner consistent with RCEA’s mission, this policy platform, RCEA’s strategic plan, and any applicable RCEA policies.

**Legislative Advocacy:** The RCEA Executive Director, or their designee, is authorized to adopt positions on legislative matters in a timely manner without Board approval if the position is aligned with the issue areas described below.

Prior to adopting a legislative position, the Executive Director shall confer with the Board Chair and Vice-Chair on the matter. If both the Chair and Vice-Chair concur that the position is consistent with the Legislative Platform and/or the mission of RCEA then the Executive Director may take the position. To keep the Board apprised of advocacy activities, staff will notify the full Board of any legislative positions taken by RCEA and deliver a quarterly report to the Board summarizing legislative engagement. Furthermore, this platform will be brought to the Board for review and input on an annual basis.

While the platform attempts to address a full range of issues of interest to RCEA, it is not intended to limit RCEA’s engagement in other issues that may impact RCEA in a positive or negative way. Issues not addressed in the platform will continue to be brought to the Board on a case-by-case basis.

## ISSUE AREAS

---

### 1. Governance and Statutory Authority

RCEA will:

- a. Oppose policies that limit the local decision-making authority of local governments or CCAs, including rate-setting authority and procurement of energy and capacity to serve their customers.
- b. Oppose policies that limit RCEA’s ability to effectively serve its customers.
- c. Support efforts of CCAs to engage with their customers and promote transparency in their operations; oppose policies that restrict or limit these abilities.
- d. Support policies that make it easier for other cities and counties to form a CCA, become members of RCEA or other CCAs, or expand the service area of an existing CCA, and oppose regulations and legislation that restrict these abilities.

### 2. Restructuring the Electric Utility Sector

RCEA will:

- a. Support policies and advocate for reforms to the utility regulatory and business model to transform IOUs into entities that solely provide transmission and distribution services.
- b. Support policies and advocate for reforms to the utility regulatory and business model to ensure Investor-Owned Utilities (IOUs) deliver greater benefits to ratepayers, increase safety and reliability, and reduce costs.
- c. Support local governments’ ability to form municipal electric utilities, including supporting legislation that expands opportunities for CCAs to become municipal electric utilities.
- d. Advocate for greater collaboration to occur between CCAs, tribes, local governments, and incumbent IOUs, particularly in local planning efforts related to energy, EV charging, community resource centers, and customer programs.

- e. Support efforts that result in IOUs providing meter data in real time to enable CCAs to better forecast and schedule load.

### **3. Power Cost Indifference Adjustment (PCIA)**

RCEA will:

- a. Support efforts by the California Community Choice Association (CalCCA) to increase the transparency of IOU electricity contracts that provide the basis for Power Cost Indifference Adjustment (PCIA) charges which RCEA (and its customers) and other CCAs must pay.
- b. Support efforts that create a pathway to reduce and eventually phase out the PCIA.
- c. Support policies that would bring stability to the PCIA and/or provide new mechanisms for CCAs to securitize PCIA charges.
- d. Oppose policies that would increase or expand exit fees, including PCIA, on CCA customers.

### **4. Public Health Emergency and Natural Disaster Response**

- a. To the extent that it does not endanger RCEA's financial health and standing, support regulatory policies, legislation, or budget appropriations to alleviate residential and commercial financial hardship caused public health emergencies or natural disasters that could disrupt electricity service to RCEA customers or restrict RCEA customers accessing clean energy opportunities. This could include, for example, assistance to avoid electric service disconnection or economic recovery funding for transportation electrification.

### **5. Reliability**

RCEA will:

- a. Support policies that reduce duration and frequency of power outages and improve grid reliability.
- b. **Public Safety Power Shut-Offs (PSPS)**
  - i. Support policies that increase the notification and transparency requirements on IOUs as they implement a PSPS.
  - ii. Support policies that create standards for PSPS implementation and penalties on IOUs that execute PSPS below those standards.
  - iii. Support policies that create rules and procedures to ensure PSPS are implemented narrowly and only as absolutely necessary.
- c. **Resource Adequacy**
  - i. Support the efforts of CalCCA to reform the Resource Adequacy program to improve electric system reliability at reasonable cost to ratepayers.
  - ii. Advocate for and support efforts to remove barriers to demand response, microgrids and behind the meter resources to provide Resource Adequacy or other demand-reduction value.

### **6. Community Resilience**

RCEA will:

- a. Advocate for and support funding for programs implemented by local governments and CCAs to increase community resilience to wildfires, PSPS events and other potential service disruptions.
- b. Support policies that reduce barriers to microgrid development by CCAs and other local entities including tribes and local governments.
- c. Support policies that expand the ability of non-IOU entities to develop microgrids (e.g., ensuring CCA access to ratepayer funds to develop microgrids).
- d. Support policies that increase the development of community level resources and distributed

energy resources that reduce the need for new transmission and distribution infrastructure. Where new transmission or distribution infrastructure is needed, support policies that design, upgrade, and scale such infrastructure to empower community members access to resources including but not limited to renewable energy, green transportation, and rural transmission infrastructure.

## **7. Climate Action**

RCEA will:

- a. Support policies that increase resources for climate change mitigation and adaptation and support initiatives that will strengthen climate change mitigation and adaptation efforts.

## **8. Renewable Energy Generation Sources**

RCEA will:

- a. Support policies that expand opportunities for or reduce barriers to the development of renewable energy sources, including, but not limited to, wind, solar, bioenergy, small hydro, and geothermal, as well as battery storage to enable use of these renewable resources, as long as local development and siting criteria are consistent with city and county land use authority, other local and state regulatory requirements, and informed by input from tribal governments.
- b. Support policies that expand opportunities for offshore wind, including investment in requisite infrastructure (e.g., harbor facilities and transmission) and workforce training necessary to support such development.
- c. Oppose policies that require CCAs to purchase specific renewable energy products, thus limiting the ability of CCAs to meet local energy needs in a cost-effective manner, and in conflict with their local procurement and rate setting authority.

## **9. Environmental Justice**

RCEA will:

Engage in regulatory and legislative developments that directly or indirectly impact the ability of rural, low-income, and underserved communities in the RCEA service territory to have affordable, reliable, and clean energy.

- a. Support policies that strengthen the resilience of vulnerable communities to adapt to the impacts of climate change.
- b. Support policies that enable all communities, including emerging and historically marginalized communities, and individuals, regardless of race, color, national origin, religion, sexual orientation, sex, gender identity, age, disability, or socioeconomic status, in California to participate in the decarbonization of the state's electrical grid, building stock, and the transportation sector in a cost-effective manner.

## **10. RCEA Programs**

- a. Protect RCEA autonomy to administer programs, and support policies that expand opportunities for or reduce barriers to the development of RCEA programs including but not limited to:
  - i. Integrated demand side management (microgrids, distributed energy resources, demand response, energy efficiency, electrification, distributed generation and storage, vehicle-to-grid storage)
  - ii. Low-carbon transportation (advanced fuel deployment, fuel efficiency, fueling infrastructure)

- iii. Energy generation and utility services (rates and tariffs, transmission and distribution infrastructure)

## **11. Local Economic Development and Environmental Objectives**

RCEA will:

- a. Support policies that enhance opportunities for local governments and CCAs to promote local economic and workforce development through locally designed programs that meet the unique needs of its member agencies and customers.
- b. Support efforts to enhance development of local and regional sources of renewable energy.
- c. Support policies that enable CCAs to collaborate with their member jurisdictions on local energy resources and projects to advance environmental objectives.

## **12. Direct Access/Electric Service Providers**

RCEA will:

- a. Oppose policies that expand direct access or the ability or economic incentives for electric service providers to selectively recruit CCA or IOU customers.