

Kimberly Rodrigues

From: Chupkov, Maya <Maya.Chupkov@cpuc.ca.gov>
Sent: Wednesday, February 24, 2021 3:59 PM
To: Comments
Subject: "CAA" Comment from the California Public Advocates Office
Attachments: A1902015 Agoura Hills City Council 2-24-2021_FINAL.docx

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Dear Mayor Weber and City Council Members:

See attached letter from the Public Advocates Office regarding the City of Agoura Hills Climate Action and Adaptation Plan.

Best regards,

Maya Chupkov, Director of Strategic Communications and Outreach
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February 24, 2021

City Council
City of Agoura Hills
30001 Ladyface Court
Agoura Hills, CA 91301

Re: Southern California Gas Company Comments on Agoura Hills Climate Action and Adaptation Plan

Dear Mayor Weber and City Council Members:

The Public Advocates Office (Cal Advocates) at the California Public Utilities Commission (Commission) is an independent public entity charged with protecting utility customers' interests. It recently came to Cal Advocates' attention that Southern California Gas Company (SoCalGas) sent a letter to the Agoura Hills City Council dated February 9, 2021, providing comment on Agoura Hills' Climate Action and Adaptation Plan. In the February 9, 2021 letter, SoCalGas mentioned Cal Advocates with reference to the utility's "Green" or Renewable Natural Gas (RNG) Tariff.

SoCalGas did not consult Cal Advocates before sending the February 9, 2021 letter. As a result, Cal Advocates is writing now to clarify its role in the RNG Tariff application and to respectfully state that Cal Advocates does not take a position on this matter.

In SoCalGas's letter, the statement that "SoCalGas, California Public Advocates, and the Environmental Defense Fund, among others, jointly filed a Green Tariff Program" is potentially confusing because Cal Advocates did not file the proposal.¹ The RNG Tariff program was jointly filed in 2019 by two investor-owned utilities: SoCalGas and San Diego Gas & Electric Company.² Cal Advocates participated in settlement discussions pursuant to the utility filing. Cal Advocates participated in the proceeding to ensure that an RNG Tariff program, if approved by the Commission, would be purely voluntary without burdening non-participating utility customers. Additionally, Cal Advocates sought to limit the RNG Tariff program duration to determine whether the program

¹ SoCalGas Letter to Agoura Hills City Council, February 9, 2021, p. 2.

² *Application (A.)19-02-015 of Application of Southern California Gas Company and San Diego Gas & Electric Company for Renewable Natural Gas Tariff* (February 28, 2019).

succeeds at reducing greenhouse gas emissions prior to establishing a permanent program.

Ultimately, the utilities, Cal Advocates, Environmental Defense Fund, and other parties reached a settlement agreement on the terms and conditions for a RNG Tariff pilot program. Several other parties opposed the joint settlement.³ The Commission further modified and approved the RNG Tariff pilot program in December 2020.

As a public entity with a specific focus on utility customer protection, Cal Advocates does not and cannot take a position on the matter of Agoura Hills' CAAP, and no such inference should be made based on either the settlement or SoCalGas's February 9, 2021 letter.

Sincerely,

Linda Soriano

Deputy Director for Energy
Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

³ See A.19-02-015, *Joint Motion for Approval of Settlement Agreement of Southern California Gas Company (U 904 G), San Diego Gas & Electric Company (U 902 G), Public Advocates Office at the California Public Utilities Commission, Environmental Defense Fund, The Bioenergy Association of California, The Coalition for Renewable Natural Gas, Agricultural Energy Consumers Association, and SFE Energy California, Inc.* (filed April 13, 2020).