December 10, 2019

Board of Supervisors  
Kern County Administrative Center  
1115 Truxtun Avenue  
Bakersfield, CA 93301

RESPONSE TO REFERRAL REGARDING FEASIBILITY OF COMMUNITY CHOICE AGGREGATION IN KERN COUNTY  
Fiscal Impact: None

This letter is a response to referral from Supervisor Scriver to explore the feasibility of procuring electricity for Kern County residents through Community Choice Aggregation.

SUMMARY

Community Choice Aggregation (CCA), or community choice energy, offers residents and businesses an opportunity to purchase electricity from local government agencies, and gives local governments the authority to manage energy resources on behalf of their communities and customers. CCA is a substantial financial and administrative undertaking, but can provide more renewable energy choices along with the potential to offer competitively priced electricity to Kern residents. The feasibility of such a project hinges on current public engagement/demand for aggregation, identifying the proper governance structure that best suits the needs of a local aggregation project, and prioritizing start-up costs in a tight budget environment.

WHAT IS COMMUNITY CHOICE AGGREGATION?

Assembly Bill (AB) 117 was passed in 2002 as a response to the energy crisis of 2000-01 and established CCA to offer Californians choice in selecting their electric provider and the source of their electricity. CCA enables California’s cities and counties, individually or collectively, to:

- Band together residents in their jurisdictions to purchase electricity as a group, with the aim of increasing renewable energy consumption, reducing greenhouse gas emissions, and potentially achieving lower rates than those available to individuals through traditional utility companies.

- Engage in energy purchasing without costly investment in infrastructure. Local government would purchase electricity on the wholesale market from any source. A CCA does not own the transmission and delivery system (i.e., the poles and wires). Instead, a CCA is responsible for providing the energy commodity (i.e., the electricity only) to its customers. The utility company in the region continues to provide essential services such as electricity distribution, metering, and billing to CCA customers.

- Procure greener energy and offer renewable energy content similar to investor-owned utilities (IOUs) in the region, such as Pacific Gas & Electric (PG&E) and Southern California Edison (SCE).
• AB 117 mandates automatic enrollment of citizens in their local CCA while providing an option for residents to opt out and continue receiving electricity from their current utility provider. *Customers can opt out of a CCA program at any time*.¹

• CCA holds local elected officials accountable for rate-setting decisions.

• CCA is predicated on *local choice*. CCA allows customers to choose between energy providers and service options, giving communities the power to make choices about energy resource portfolios and investments, and empowers communities to reinvest locally in programs that typically address economic, social and environmental justice goals.

• A CCA’s primary mission is to serve its local constituents, rather than to maximize profits for shareholders, as is the case with an IOU.

**EXISTING CCA PROGRAMS IN CALIFORNIA**

After the enabling legislation was passed in 2002, it took 8 years before a CCA program began operating in California. As of the date of this Board letter, the California Community Choice Association (CalCCA) lists 19 CCA programs operating across the state with many other jurisdictions considering feasibility in their regions. The existing CCA programs in California are:

**Apple Valley Choice Energy** – City of Apple Valley
**Clean Power SF** – San Francisco County
**Clean Power Alliance** – Unincorporated Ventura County and 7 cities; unincorporated Los Angeles County and 22 cities
**East Bay Community Energy** – Unincorporated Alameda County and 11 cities
**King City Community Power** – King City
**Lancaster Choice Energy** – City of Lancaster
**Marin Clean Energy (MCE)** – Marin and Napa County, 1 city in Solano County, unincorporated Contra Costa County and 13 cities
**Monterey Bay Community Power** – Unincorporated Monterey, San Benito, and Santa Cruz County and 16 cities
**Peninsula Clean Energy** – Unincorporated San Mateo County and 20 cities
**Pico Rivera Innovative Municipal Energy** – City of Pico Rivera
**Pioneer Community Energy** – Unincorporated Placer County and 5 cities
**Rancho Mirage Energy Authority** – City of Rancho Mirage
**Redwood Coast Energy Authority** – Humboldt County
**San Jacinto Power** – City of San Jacinto
**Silicon Valley Clean Energy** – Unincorporated Santa Clara County and 13 cities
**Solana Energy Alliance** – City of Solana Beach
**Valley Clean Energy** – Yolo County and cities of Woodland and Davis

¹ See more details on opt-out policies under “Risks of CCA” below.
EXISTING CCA RATES COMPARED TO IOU RATES

Compared to other states, adoption of CCA programs in California have emerged primarily to combat climate change and reduce greenhouse gas emissions. At current rates (2019), CCA programs operating in California are typically delivering electricity with a slightly higher renewable energy content at slightly lower rates compared to similar IOU product lines. CCAs typically offer at least two pricing tiers, a default product that is similar to default IOU rates and a more expensive option that is comprised of 42% - 100% renewable energy. At this point in CCA program development, customers must be willing to pay higher rates to receive 100% of their electricity from renewable energy sources (see Residential Cost Comparison
in Exhibit A). While solar and/or wind power isn’t literally delivered right to a customer’s home, the idea is that the more CCAs procure renewable energy on behalf of their communities, the more green energy flows on the California grid. Considering that ratepayers in the Central Valley typically experience exceptionally high utility bills, particularly in the summer months, the promise of saving a dollar or two each month may not be enough to incentivize customers to remain with a CCA program in Kern County.

**OPERATIONAL MODELS FOR CCA**

Local governments can choose three basic frameworks to form and govern a CCA program:

1. **Joint Powers Authority** – Establishes a multi-jurisdictional Joint Powers Authority (JPA). This model would be most appropriate if the County intends to include incorporated cities in the CCA program. A JPA would serve as an independent public agency that operates the CCA on behalf of its members.

2. **Single Jurisdiction** – A city or county individually establishes and operates a CCA as an enterprise fund within the municipality/jurisdiction. This model would be most appropriate if the County intends to only offer services to customers in the unincorporated areas of the County. This model differs from the JPA model in that the city or county retains full program autonomy and all revenue.

3. **Commercial Vendor Package** – Under this model the County would contract with a private company to manage the CCA on behalf of the local government(s). Local government(s) would still be able to exercise strong operational involvement and control customer revenue. This model, however, has not been applied in California to date.

Both the JPA and single jurisdiction models of governance require upfront financing although start-up costs are typically recovered by the participating jurisdiction(s) from revenue generated after service commences. In the commercial vendor framework, the private company could use its own financial resources to launch and administer the CCA program and then would share in the CCA revenues as compensation.

**STEPS TO ESTABLISH A CCA PROGRAM**

Establishing a CCA program requires technical expertise and understanding of commercial utility markets to ensure the County’s engagement in energy procurement makes financial sense. Ultimately, the California Public Utilities Commission (CPUC) must receive and certify an implementation plan prior to service launch. CCA development typically occurs in three phases:

*Phase 1* — this phase addresses the feasibility of creating a CCA, including careful consideration of the potential benefits and risks. This process includes the definition of objectives and evaluation of the economic feasibility of achieving those objectives given local circumstances, including financial, political, administrative, and regulatory considerations. Phase 1 would also be the appropriate time to reach out to other jurisdictions potentially interested in joining the CCA effort and conduct an initial public outreach (if the idea to pursue CCA did not originate as a grassroots movement). In this phase an official declaration should be sent to the service area IOU(s) and the CPUC, allowing the jurisdiction to request aggregate load data from the utility servicing the region. Once the data is received, a consultant is typically hired to analyze the data, determine load profiles, estimate total usage, compare the data to current market conditions, and prepare a financial pro forma.

A Request for Proposals (RFP) for a feasibility study would allow for a thorough analysis of the benefits and risks of a CCA program specific to Kern’s customer load profile, potential program size, and various power supply scenarios. Preliminary cost estimates for a CCA feasibility study range between $50,000 to $150,000. The Board would need to allocate unbudgeted resources to pursue CCA exploration. Resources
spent on a feasibility study could result in a sunk cost if the feasibility analysis determines that CCA is not financially viable in Kern. If, however, the feasibility analysis determines that CCA in Kern can be successful, and the Board decides to pursue CCA, the costs for the feasibility study would be recovered once CCA operations commence.

**Phase 2** — if the feasibility analysis results in a decision to pursue CCA, each city and/or county that is going to participate in the CCA must pass a local ordinance or resolution to establish and make membership in the CCA official. Depending on the desired model, the city or county needs to pursue the formation of a legal entity (JPA model) or establish a division within the local city or county government to administer the CCA program (single jurisdiction model). An implementation plan, which identifies the CCA program’s operational structure, sources of electricity, rate setting, participation with other jurisdictions (JPA model), and rights and responsibilities of program participants, must be completed in this phase. In addition, a statement of intent, which addresses issues of universal access, reliability, customer class equity, and other requirements, must also be completed in this phase. The implementation plan and statement of intent must be filed with and certified by the CPUC prior to launching service.

This phase of the CCA development process is typically the most expensive as it involves setting up the regulatory and legal framework for the program. While start-up and implementation costs have steadily declined over the last decade, costs associated with this phase are still considerable and will prove challenging in the context of the County’s current budget environment.

**Phase 3** — finally, the jurisdiction establishing a CCA program must enter into a service agreement with the local IOU, procure an energy supply, data management and electricity scheduling services, and notify customers according to the statutory noticing requirements. Customers are enrolled in this phase and all applicable accounts are established for the CCA’s customers.

While durations can vary greatly, most jurisdictions considering CCA should plan for a 1 to 3 year timeframe, from the declaration to pursue up to the time of operation, depending on the degree of support and interest within the community.

**START-UP COST OF CCA**

Prior to collecting ratepayer revenue, staff and contractor start-up activities related to data management, communications, marketing, utility switching functions, legal functions, load forecasting, billing, customer service, and financial management must be in place. The bulk of these costs typically occur in Phase 2.

- **Marin Clean Energy**
  Total investment to plan, study, create and implement MCE was $3.3 million with $540,000 coming from interest-free loans advanced by Marin County and the remainder borrowed through individual loans ($2.2 million) and provided through grants ($642,000).

- **Sonoma Clean Power**
  Total investment to plan, study, create and implement SCP was $1.7 million. The Sonoma County Water Agency (via the General Fund) funded all initial start-up costs through a low-interest loan (3%) to Sonoma Clean Power.

- **Lancaster Choice Energy**
  Total investment to plan, study, create and implement LCE was approximately $1 million funded by a loan from the City of Lancaster's General Fund.
**Benefits of CCA**

There are a variety of potential benefits from establishing a CCA program. Some examples include:

- Local accountability. One of the primary benefits of establishing a CCA program is local accountability for rate-setting, selection of energy resources, and administration of the CCA. The CPUC, headquartered in San Francisco, is currently responsible for rate-setting and other regulatory changes that can significantly impact the rates local residents pay. Under a CCA program, local elected officials are held accountable for rate-setting decisions.

- Revenue stays local. CCA programs typically reinvest locally and aggressively pursue renewable energy projects to continue to offset the cost of electricity for its rate payers, as evidenced by the 10 megawatt (MW) solar project Marin Clean Energy constructed in Richmond, CA. The solar farm generates enough electricity to power about 3,400 homes and supported jobs with a commitment to a 50% local hire requirement. Similarly, Sonoma Clean Power completed a 2MW solar installation that is expected to produce enough electricity to power roughly 600 homes.

- Local jurisdictions choose their renewable energy content. A CCA program allows residents to determine which mix of renewable and traditional energy resources best fits their community’s needs. Currently, PG&E and SCE offer products that are slightly lower in renewable energy content compared to the base offerings of the existing CCA programs currently operating in California. CCA programs also typically offer larger incentives to households and businesses that generate excess solar or wind energy via net energy metering programs. Net energy metering (NEM) is a billing system that credits customers at a set retail electric price for any excess electricity that is generated from on-site sources such as residential rooftop solar arrays.

- The ecological benefits related to the procurement of energy from renewable and/or low-emission resources in conjunction with the proliferation of distributed energy resources such as rooftop solar and electric vehicle infrastructure can have a profound impact on local environmental conditions. CCA offers an opportunity to influence and implement effective energy efficiency and demand-side management programs within the community.

**Risks of CCA**

Despite the potential benefits, CCA is a substantial undertaking for any community. One of the first things to consider is whether there is the political commitment to form and ultimately implement CCA. Since constituents will automatically be enrolled, there will need to be significant public outreach and stakeholder buy-in before the project ensues. Some of the potential risks associated with establishing a CCA program include:

- The consumer opt-out privileges guaranteed by AB 117 present a challenge to the planning and operation of CCAs since the CCA will not know in advance of substantial investment the exact size, scope, and load profile of its customer base. Customers may opt out of CCA service during the enrollment period, or at any time after starting service with the CCA. CCA programs are required to send potential customers at least four notifications that include opt-out instructions; twice during a 60-day period in advance of the date of automatic enrollment, and twice during a 60-day period following enrollment in the CCA program. During these periods, customers can opt out of the CCA program without any cost. To opt out, CCA programs will typically require customers to take some type of action, such as calling a toll-free number, sending a self-addressed return postcard or letter, or completing an opt-out form on the internet. Customers who opt out of a CCA program after the first 60 days of service are required to remain with the IOU they are returning to (PG&E, SCE, SDG&E) for
one year. After that period, the customer can rejoin the CCA program if they desire. Current CCA retention rates average between 78% and 89%\(^2\).

- Errors in market analyses, energy procurement, and opt-out forecasting could result in CCA rates that are higher than utility rates. To date, the CCA programs currently operating in California have not experienced significant analytical or forecasting shortfalls.

- Energy markets can be volatile. If CCA rates are not sufficiently below IOU rates (PG& E and SCE), customers may likely return to IOU bundled service (generation and delivery). In that scenario, CCA rates would likely have to rise to recover the difference, which could prompt more customers to opt out of the aggregation program and potentially set off a self-destructive cycle of rising rates and departing customers.

- CCA participants are subject to an “exit fee” called the Power Charge Indifference Adjustment (PCIA). The exit fee is meant to ensure that the utilities' own sunk costs do not shift to customers that remain with the utility when a CCA program is established. Since the IOU is still responsible for the cost of fulfilling the energy it purchased when its customer base was larger, the IOU sells the excess power it has on the open market and recovers any loss between the contract price it paid and the market price it receives from the departed customers via the PCIA.

Much of the excess electricity IOUs are left with after customers depart for a CCA program comes from long-term power purchase contracts signed when electricity prices, particularly for solar and wind power, were substantially higher than they are now. Proponents of CCA programs argue that IOUs have been selling their excess electricity in the short-term, spot market, rather than trying to sell the power under longer-term arrangements that might yield a higher price. Spot contracts typically sell the commodity, electricity, the next day. So the price is highly variable as it is based on current supply and demand. Long-term contracts, on the other hand, typically range in duration from one to 15 years and offer more stable returns. The difference is costing CCA ratepayers significant amounts of money and threatens the viability of CCA competitiveness into the future.

Exit fees are set on an annual basis and are locked in for customers based on the date of their service change. In December 2015, the CPUC issued a decision to increase the PCIA exit fee at the request of the IOUs. As a result of the CPUC’s decision, MCE customers paid $18.1 million\(^3\) in exit fees to PG&E in 2015 and $36.4 million in 2016. Similarly, Sonoma Clean Power paid roughly $32 million\(^4\) in 2015 and approximately $65 million in 2016. As exit fees increase, CCA customers are likely to experience diminished rate savings. Future changes to the PCIA can negatively impact CCA rates, and could result in customers who opt out, triggering an overall decline in CCA program revenue. Legislative and regulatory changes such as these are a key variable that can significantly impact the success of CCA programs, with most changes falling outside the control of local government.

\(^2\) Data from UCLA Luskin Center for Innovation - CCA report, 2017.
\(^3\) PCIA data from the Center for Climate Protection.
\(^4\) PCIA data from Sonoma Clean Power staff.
• Despite the CPUC-approved PCIA increases in 2015, PG&E, SCE, and SDG&E petitioned the CPUC again in April 2017 to adopt a new arrangement for charging customers who choose CCA over their incumbent IOU, arguing that the PCIA methodology is not adequately compensating the IOUs for the full share of costs associated with their electricity contracts. The IOUs requested additional fees for departing load customers to ensure that bundled service customers (those who remain with the IOU) do not experience any cost increase as a result of the CCA programs in their territory. In October 2018 the CPUC ruled on Phase I of the PCIA methodology effectively increasing the PCIA rate CCA customers must pay. While the CPUC’s decision was seen as unfavorable to CCAs and competition, the effects will not likely be significant enough to change the overall landscape for existing CCAs. Emerging CCAs, however, may need to defer launch or seek to join existing agencies. Based on the Phase I ruling, new CCAs may see an increase in the time it takes to build reserves and the discount rates they can offer customers at the commencement of operations may need to be lowered. The regulatory landscape governing CCA is not yet settled and important decisions regarding the allocation of contract costs borne by the IOUs will play a significant role in the ongoing financial viability of CCA programs in California. In addition, three working groups (WGs) were formed by the CPUC to resolve remaining PCIA issues that have been deferred to a Phase II PCIA proceeding. WG 1 is tasked with resolving benchmark issues and is expected to complete its work this year (2019). WG 2 is tasked with resolving prepayment issues and work is expected to be completed in early 2020. WG 3 is tasked with resolving portfolio optimization and cost allocation issues and work is expected to be completed in mid-2020.

• The state’s Renewable Portfolio Standards (RPS) are the same for both IOUs and community choice aggregators (25% of retail sales must be generated by renewables by the end of 2016, 33% by the end of 2020, and 50% by 2030). One of the primary motives behind CCA development is to increase renewable energy consumption; however, the state’s aggressive RPS for all energy producers could abate one of aggregation’s key selling points. At least 50% of the energy Californians consume will come from renewable sources as 2030 approaches, regardless if consumers are in a CCA or remain with an IOU. One of the key selling points behind CCA is the opportunity for ratepayers to choose greener products. As California moves towards its RPS goals, the disparity between IOU and CCA green energy offerings will diminish.

• Aggregation may be construed as government overreach by some constituents. Opportunities like NEM allow individuals to invest in their own domestic solar and wind units to offset their energy costs. Is local commitment to use renewable energy sufficient to warrant CCA development or is it best left to individuals to decide how their energy needs are met? Furthermore, the County’s recent rescission from the Property Assessed Clean Energy (PACE) program has eliminated a financing option for those who might be considering residential solar and wind energy installations to help offset the cost of their utility bill. Mandatory enrollment in a County-sponsored CCA energy program will require significant public outreach and marketing to prevent large opt-out volumes if a program is pursued in Kern.

• Kern also faces the unique challenge of having to work with two IOUs (PG&E and SCE)\(^5\). None of the existing CCA programs currently operating in California has had to implement its program in an area

\(^5\) See Exhibit B for Kern’s utility service areas
serviced by two utility companies. Coordinating with two IOUs will inevitably add to the complexity and cost of implementing a CCA program in Kern County. The Public Utilities Code currently requires a public agency seeking to serve as a community choice aggregator to offer the opportunity to purchase electricity to all residential customers within its jurisdiction. Since the County is currently served by two IOUs (PG&E in the west and SCE in the east), CCA in Kern would require a “dual” program that provides services to residents in both IOU territories.

In September 2017 Central Coast Power, an exploratory CCA program that sought to bring together San Luis Obispo, Santa Barbara, and Ventura County, completed its feasibility study and found that the proposed project was financially untenable. Officials determined that the CCA program was at a competitive disadvantage because the proposed CCA territory had two incumbent utilities serving the area rather than one (PG&E services San Luis Obispo County and the northern half of Santa Barbara County while SCE covers southern Santa Barbara County and Ventura County). The data concluded that a smaller scale CCA operating in PG&E-only territory (San Luis Obispo County) might be fiscally viable as rates in SCE territory are lower than PG&E generation rates, therefore making competition in the SCE region more difficult for the proposed CCA.

**NEXT STEPS**

Finally, there are several key variables that need to be considered regarding the feasibility of community choice energy in Kern County. Given that the County has just completed a 4-year fiscal deficit mitigation plan, the following questions should be considered by your Board:

1. What does Kern County hope to achieve by providing a CCA alternative to residents and businesses?
   - Reduce the cost of electricity for Kern’s ratepayers? If so, by how much?
   - Increase the amount of renewable energy consumed by Kern residents? If so, by how much?
   - Spur economic development through the construction of renewable energy projects? Offer financial incentives through reduced energy rates to attract new businesses?

2. What is the current appetite for CCA among Kern County’s residents? Without public buy-in, there may not be enough support to prevent large numbers of consumers from opting-out of a County-run CCA program.

3. What is an appropriate energy mix for Kern County?
   - RPS Equivalent: This scenario assumes that Kern would offer its base electricity product to all customers starting at 33% renewable content in 2020 and ramping up to 50% renewable content by 2030 in alignment with the California minimum RPS.
   - Middle of the Road: This scenario assumes that Kern would offer its base electricity product to all customers using 50% renewable content.
   - Aggressive: This scenario assumes that Kern would offer its base electricity product to all customers using 75% renewable content.

4. Does the Board want to approach incorporated cities in Kern to participate in a CCA program?
5. Is the Board interested in pursuing a single jurisdiction CCA? If so, which County department would be responsible for implementing the strategy and the initial and ongoing costs for staffing a new program?

6. Is the Board interested in exploring the possibility of joining an existing CCA program? Staff would need to gauge existing CCA program interest in adding Kern.

Given the unresolved nature of the PCIA Phase II proceedings and the inherent financial risk pursuing CCA can have for the County, your Board should consider postponing further CCA exploration until there is a more definitive regulatory environment that adequately addresses the current disparity between costs allocated to remaining IOU customers and those customers who opt for CCA participation via the PCIA exit fees.

Therefore, IT IS RECOMMENDED that your Board receive and file this report.

Sincerely,

Ryan J. Alsop
County Administrative Officer

cc: County Counsel
## EXHIBIT A - Residential Rate Comparison (IOU vs. CCA)

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<th>SCC Default [2% Renewable]</th>
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<th>SCC (0% Renewable)</th>
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EXHIBIT B - PG&E and SCE Territory in Kern

PG&E service area

SCE service area