

**CALIFORNIA PUBLIC UTILITIES COMMISSION  
EN BANC ON CORE/NON-CORE ISSUES**

**Tuesday, April 20, 2004**

**COMMENTS OF THE CALIFORNIA CITY-COUNTY STREET  
LIGHT ASSOCIATION**

Good afternoon, President Peevey and Members of the Commission --

My name is Reed Schmidt and I am here on behalf of the California City-County Street Light Association.

CAL-SLA represents cities and counties that take street light service from the three investor-owned utilities, Pacific Gas & Electric, Southern California Edison, and San Diego Gas & Electric. The association also is interested in traffic control signals.

Street lighting is a separate customer class for all three utilities. It has its own unique service characteristics. Most electric usage is off-peak and is unmetered.

The street light class is the smallest customer class, in terms of kilowatt-hour sales and revenues. About 1 percent of the total system sales and revenues.

CAL-SLA supports the debate and analysis of the core/non-core market structure. We support the return of direct access — retail choice — under fair and reasonable rules and the proper design of utility rates following cost causation.

CAL-SLA supports community choice aggregation permitted by Assembly Bill 117. We are strong believers in customer choice. We want to make sure cities and counties in California have choices, when it comes to purchasing electricity.

One way to assure customer choice for cities and counties is to allow them to aggregate...combine the separate loads for street lights in order to reach the core threshold, with 500 kilowatts being discussed right now.

An individual street light may draw between 100 to 400 watts. That is maximum demand. A street light comes on at dusk, stays on for around 11 hours, and then turns off at dawn.

Any given city or county may have many different number of street lights. For example...

City of Pacific Grove	700
San Francisco	42,500
San Jose	56,000
City of Berkeley	8,000
City of Pleasanton	7,000
City of Bakersfield	13,000
Town of Lathrop	300
City of Oxnard	9,600
City of Inglewood	6,700
City of Hemet	4,000
City of San Diego	42,800
County of San Diego	9,400
Los Angeles County	108,00 (unincorporated area and 20 cities)
Incorporated and unincorporated Marin County	13,000

What cities and counties want to be able to do is to combine all of their street lights into one aggregation. Moreover, they want to be able to combine their street load with other municipal loads. The other municipal loads could be the city hall, police and fire stations, libraries, traffic signals. Moreover, some cities and counties own and manage water and wastewater treatment facilities. They want to be able to aggregate the loads of all municipal accounts, including street lights.

A city or a county sees itself as one customer to the electric utility. The electric utility however may have numerous accounts for one particular city or county. The city hall is one account. The civic center is one account. A police station is one account. A library is one account. And for billing purposes, the utilities usually combine street lights into many accounts. Each street light is not a separate account, even though each street light has its own separate service connection.

CAL-SLA members want to be able to combine their street light loads in order to be able to buy electricity from an electric service provider when direct access returns. This is how some cities and counties maintain the street lights they own. The cities and the county in Marin County have created a joint powers authority to maintain the 13,000 street lights in Marin County. The JPA contracts with a private electrical contractor for street light maintenance. The cities and county in Marin get a better maintenance price because there are more lights under one large contract. Economies of scale.

In conclusion, CAL-SLA urges the Commission, when looking at the new market, the core/non-core market, to allow customers, like street light customers, *at the very beginning of the new market*, to aggregate their electricity demand in order to reach the minimum size threshold for noncore eligibility.

Thank you.