

APPROVED  
JA 10/1/18

CITY COUNCIL  
CONSENT CALENDAR

OCTOBER 1, 2018

SUBJECT:           **UPDATE ON THE CLEAN POWER ALLIANCE**

INITIATED BY:     **PLANNING AND DEVELOPMENT SERVICES DEPARTMENT**  
(John Keho, AICP, Interim Director) JK  
(Bianca Siegl, Long Range and Mobility Planning Manager) BJS  
(Robyn Eason, Senior Planner) RE

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**STATEMENT ON THE SUBJECT:**

The City Council will receive an update on the Clean Power Alliance (CPA).

**RECOMMENDATIONS:**

Receive and file.

**BACKGROUND / ANALYSIS:**

This report provides an update on the status of the Clean Power Alliance (CPA). The Clean Power Alliance (CPA) is a community choice energy (CCE) program, established as a Joint Powers Authority (JPA) of 31 local governments in Los Angeles and Ventura Counties, including West Hollywood, working together to bring clean energy choices to communities. As a CCE, CPA purchases clean power and sells it to customers, while Southern California Edison (SCE) is responsible for delivery, billing, and for resolving any electricity service issues.

**Previous Council Direction**

On September 18, 2017, City Council approved a motion to become a member of the Clean Power Alliance. On February 20, 2018, City Council selected the 100% renewable energy tier offered by the CPA and directed the Planning and Development Services Department and the Communications Department to coordinate design, development, and distribution of city-specific outreach materials to assist in raising awareness about CPA prior to automatic enrollment (Attachment 1).

**Background Information**

Community Choice Energy (CCE) is a way for government agencies to buy and/or generate clean electricity for residents and businesses. CCE creates a partnership between the municipality and the existing utility provider, giving local governments the option to purchase up to 100% renewable electricity – such as solar, wind, bioenergy, geothermal, and hydroelectric – at competitive rates and helping communities achieve their climate action goals. The municipality can buy power from cleaner renewable sources, and use the existing utilities (e.g. Southern California Edison - SCE) to deliver energy to customers.

## **Current Status of the Clean Power Alliance (CPA)**

Since the City Council action in February 2018, the Board of CPA has established a Chair and Vice-Chair, approved the hire of a permanent Executive Director and specialized staff positions, proceeded with various contracts for continued legal, personnel, and power procurement services, and formed several standing and ad hoc committees such as Finance, Community Outreach, Legislative Affairs, etc. to facilitate decision-making.

### Program Phasing

To date, CPA has initiated service to municipal and commercial customers in unincorporated Los Angeles County and the Cities of Rolling Hills Estates and South Pasadena. In February 2019, CPA will phase in all residential customers in its service territory (Phase 3), and all remaining non-residential customers in its service territory (Phase 4) in May 2019. Phasing in customers over the course of 12 to 16 months ensures a smooth transition of customer accounts, data, and billings. West Hollywood residential energy customers will be auto-enrolled into the Clean Power Alliance during Phase 3 and its nonresidential energy customers will be auto-enrolled during Phase 4. A detailed timeline of CPA's ratemaking and customer phasing can be found in Attachment 2.

Before automatic enrollment into the program begins, prospective CPA customers will receive two written notices in the mail from the CPA Authority that will explain the program's goals, terms, and conditions and how customers can opt-up, opt-down, or opt-out of the program if desired. These notices will be sent respectively at 60 days and 30 days prior to automatic enrollment. After transfer of service, two additional notices will be sent to CPA customers (at 30 and 60 days after enrollment), notifying them again of the shift from Southern California Edison to CPA, the program details, and the ability to opt-out. Following 60 days after enrollment, a small service charge (less than \$2.00) will be applied to any customer wishing to opt-out.

### Default Renewable Energy Tiers

Within the Clean Power Alliance (CPA) structure, each individual city and county member has the authority to select one of the default renewable energy tiers that will be offered to residents and businesses within their jurisdiction. The method by which each member makes this determination is entirely within their own city's purview as there are no legal requirements governing this selection. Each member agency selects one of three renewable energy tiers as the default product into which their residents and businesses will automatically be enrolled. This default product is the product that customers will receive if they do not make any opt-out, opt-up or opt-down selections.

In February 2018, CPA members were asked to make a selection on a default renewable energy tier based on the information presented in Table 1. Having this preliminary information allowed CPA to better understand its overall program profile and begin procuring energy resources. At that time, the City Council selected to participate in the 100% default renewable energy tier. In this tier, customers not currently enrolled in SCE's bill assistance programs will pay a small premium on their bill unless they opt-down to the 36% or 50% default renewable tiers or opt-out and stay with Southern

California Edison (SCE).

**Table 1: Default Renewable Energy Tiers, as of February 2018**

Clean Power Alliance Plan Renewable Energy Options	Cost Relative to SCE Rates
36% Renewable, 50% GHG-free	4% overall bill <i>discount</i> to SCE base rate
50% Renewable, 50% GHG-free	3% overall bill <i>discount</i> to SCE base rate (at least 12% overall bill discount to SCE 50% renewable option)
100% Renewable, 100% GHG-free	7% overall bill <i>premium</i> to SCE base rate for customers (at least 10% overall bill discount to SCE 100% renewable option)

\*GHG = greenhouse gas

As CPA prepares to expand service in 2019 and the 2019 energy rates are closer to being disclosed, CPA has updated the likely discounts or premiums for customers in its territory (see Table 2). The updated bill discounts or premiums in the table are presented as a range due to two main uncertainties.

1. SCE's 2019 energy rates, which are used as a benchmark for CPA energy rates, are difficult to predict until SCE submits an updated rate forecast to the California Public Utilities Commission (CPUC) on November 8.
2. CPA is still in the process of procuring energy for 2019, leaving some uncertainty around costs.

**Table 2: Default Renewable Energy Tiers, as of September 2018**

Clean Power Alliance Renewable Energy Options	Cost Relative to SCE Rates
36% Renewable, 50% GHG-free	1%-2% overall bill <i>discount</i> to SCE base rate
50% Renewable, 50% GHG-free	0%-1% overall bill <i>discount</i> to SCE base rate
100% Renewable, 100% GHG-free	7%-9% overall bill <i>premium</i> to SCE base rate for non-CARE customers (at least 5% overall bill discount to SCE 100% renewable option)  Parity with SCE base rate for CARE and other low-income customers

Each of the rate options in Table 2 contains a range of outcomes to reflect the current uncertainty, which are described below.

- 36% Renewable Energy Tier - For the 36% renewables base rate, CPA is targeting a discount to the overall SCE bill of 1.5%, but the rate discount could be higher or lower depending on SCE rates and CPA costs.
- 50% Renewable Energy Tier - For the 50% renewables tier, CPA is targeting a rate equal to SCE's rates depending on SCE rates and CPA costs.

- 100% Renewable Energy Tier - CPA is targeting an 8% premium to SCE's overall bill for the 100% renewables rate, but this could be higher or lower depending on the same factors. For member agencies who choose 100% renewables as their default rate, CARE customers (or qualified low-income customers) will be offered 100% renewables at the same rate they are paying currently (including their low-income discount). This avoids automatically increasing costs for CPA's most vulnerable customers.

By the November 2018 Board meeting when residential rates will be set, these uncertainties will largely be resolved as SCE will have filed with the CPUC and CPA will have locked in much of its 2019 energy costs. With this added certainty, final decisions for the actual rates for each of the tiers and their financial impact on CPA and its customers will be made at the November 2018 Board meeting for residential customers, and at the February 2019 Board meeting for non-residential customers. A detailed timeline of CPA's ratemaking and customer phasing can be found in Attachment 2.

Since the City Council selected to participate in the 100% default renewable energy tier in February, no action is required at this time. West Hollywood customers will be automatically enrolled at the time of CPA service commences (February 2019 for residential customers, May 2019 for nonresidential customers). Customers may opt up, opt down, or opt out of CPA service at any time.

#### Communication and Outreach

CPA entered into an agreement in March 2018 with The Energy Coalition to provide consultant services for communications, outreach, and marketing. Since that time, the Energy Coalition established a foundation for CPA's overall brand and communications strategy moving forward, completed a number of deliverables that have enabled CPA to experience a smooth roll out to over 34,000 customers to date, and conducted initial outreach to its members and the many stakeholders across its territory. The Energy Coalition will continue to provide the communications materials required for Phases 3 and 4, including enrollment notices, rate comparison mailers, management of CPA's full website, as well as to assist with implementation of CPA's overall communications and marketing strategy.

The Planning and Development Services Department and the Communications Department intend to work with CPA staff and The Energy Coalition to coordinate design, development, and distribution of City-specific outreach materials to assist in raising public awareness about Clean Power Alliance. These materials, which may include 1-2 Citywide mailers, printed and digital outreach tools, and paid advertising will be designed to appeal to the West Hollywood community and ensure that community members are well-informed of clean renewable energy choices offered by the program. The Communications Department will also utilize all appropriate communications tools including, but not limited to, the City's website, media relations, and social media tools to deliver additional messaging and content about the program through diverse distribution channels.

**CONFORMANCE WITH VISION 2020 AND THE GOALS OF THE WEST HOLLYWOOD GENERAL PLAN:**

This item is consistent with the Primary Strategic Goal(s) (PSG) and/or Ongoing Strategic Program(s) (OSP) including:

- OSP-1: Adaptability to Future Change.
- OSP-12: Actively Participate in Regional Issues.

In addition, this item is compliant with the following goal(s) of the West Hollywood General Plan:

- IRC-6: Reduce the City's contribution to global climate change and adapt to its effects.

**EVALUATION PROCESSES:**

The City will monitor participation levels of West Hollywood customers in CPA throughout the first 12 months of the program.

**ENVIRONMENTAL SUSTAINABILITY AND HEALTH:**

Participation in the Clean Power Alliance will shift the percentage of the City's energy utility powered by clean renewable energy, thereby reducing its overall greenhouse gas emissions and better positioning the City to achieve some of its climate action goals.

**COMMUNITY ENGAGEMENT:**

Prior to program launch, a Community Choice Energy program must perform the required noticing to the community regarding the options and incentives available by participating in the program and allow for members of the community to opt out if desired. The City of West Hollywood will work in conjunction with the Clean Power Alliance to ensure that the community is well-informed and up-to-date on the process and program options and supplement CPA's notices with additional information for West Hollywood power customers.

**OFFICE OF PRIMARY RESPONSIBILITY:**

PLANNING AND DEVELOPMENT SERVICES DEPARTMENT / LONG RANGE PLANNING DIVISION

**FISCAL IMPACT:**

The proposed expenditure for communications and outreach for this item, \$50,000 is budgeted for fiscal year 17-18 in account 100-3-07-83-531019 (New Initiatives).

AMOUNT	DESCRIPTION
\$50,000	Funding for this item is already budgeted.

**ATTACHMENTS:**

1. February 20, 2018 – Selection of Default Renewable Energy Tier with the Clean Power Alliance
2. Timeline of CPA's Ratemaking and Customer Phasing

**SUBJECT: SELECTION OF DEFAULT RENEWABLE ENERGY TIER WITH  
THE CLEAN POWER ALLIANCE**

**INITIATED BY: COMMUNITY DEVELOPMENT DEPARTMENT**  
(John Keho, AICP, Interim Director) *JK*  
(Bianca Siegl, Long Range and Mobility Planning Manager) *BS*  
(Robyn Eason, Senior Planner) *RE*

**COMMUNICATIONS DEPARTMENT**  
(Lisa Marie Belsanti, Communications Director) *LMB*  
(Joshua Schare, Communications Manager) *JS*

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**STATEMENT ON THE SUBJECT:**

The City Council will consider selecting a default clean energy tier for West Hollywood power customers as a member of the Clean Power Alliance (CPA), formerly known as Los Angeles Community Choice Energy (LACCE), and directing staff to conduct public outreach to raise awareness about CPA.

**RECOMMENDATIONS:**

- 1) Select the 100% Renewable Energy Tier offered by the Clean Power Alliance
- 2) Direct the Communications Department to utilize all appropriate communications tools including, but not limited to, the City's website, media relations, and social media tools.
- 3) Direct the Community Development Department and the Communications Department to coordinate design, development, and distribution of City-specific outreach materials to assist in raising awareness about Clean Power Alliance.

**BACKGROUND / ANALYSIS:**

Over the past decade, the City of West Hollywood has encouraged the evolution of community choice energy programs within Southern California as an innovative option to procure clean renewable energy for its community. In 2017, city staff assessed two local options for community choice energy programs and invited representatives from these programs to present to the City Council. After evaluating the risks and momentum of each program, City Council directed staff to return with an item containing the necessary documentation to become a member of the Clean Power Alliance (CPA)—formerly known as Los Angeles Community Choice Energy (LACCE). As a member of CPA, all energy customers in West Hollywood can obtain power from cleaner renewable

energy sources, while retaining Southern California Edison (SCE) as the agency delivering the power.

The purpose of this report is to provide:

- A general update on the status of CPA since the City became a member in September 2017
- A recommendation on the City's selection of a default renewable energy tier
- A description of how the Communications Department will facilitate community awareness about CPA

### **Previous Council Direction**

On August 3, 2015, the City Council adopted a resolution to participate in a financial and technical feasibility study to assess the costs, benefits, and risks associated with developing a Community Choice Energy (CCE) program, also known as Community Choice Aggregation. On February 21, 2017, staff provided a general update on two local CCE options: Clean Power Alliance (CPA) and South Bay Clean Power (SBCP). On August 7, 2017, staff and representatives of the Clean Power Alliance and South Bay Clean Power provided updated information on their programs for City Council consideration. The City Council directed staff to return with an item to move forward with the enabling ordinance and final JPA for CPA before the opt-in period ends in December 2017 and to include a financial analysis of the program. On September 18, 2017, staff returned with the requested documentation to become a member of CPA and confirmed very limited potential financial risk in joining CPA (Attachment 1). The City Council also designated Councilmember Lindsey Horvath as the regular Director, with Councilmember Lauren Meister and Robyn Eason, city staff member in the Long Range Mobility Planning Division, filling the roles of first and second alternate Director, respectively.

### **Background Information**

Community Choice Energy (CCE) is a way for government agencies to buy and/or generate clean electricity for residents and businesses. CCE creates a partnership between the municipality and the existing utility provider, giving local governments the option to purchase up to 100% renewable electricity – such as solar, wind, bioenergy, geothermal, and hydroelectric – at competitive rates and helping communities achieve their climate action goals. The municipality can buy power from cleaner renewable sources, and use the existing utilities (e.g. Southern California Edison - SCE) to deliver energy to customers.

The State legislature enacted AB 117 in 2002, which authorized the creation of CCEs in California. This bill allowed for community choice energy programs to be established in the form of joint powers authorities, a single city, or a commercial managed service. CCEs are regulated through the California Public Utilities Commission (CPUC) and once established, jurisdictions can opt-in to a CCE as the default provider of energy services. Community Choice Energy programs have been rapidly emerging throughout the State. Since 2010, at least nine CCEs have launched within California, including the Clean Power Alliance, in April 2017.



### **Current Status of the Clean Power Alliance (CPA)**

The Clean Power Alliance is positioned to be one of the largest community choice energy programs in the State and have a critical mass of customer accounts that will offer the program a unique competitive advantage when negotiating energy rates and renewable energy options.

### **Membership**

Since launch, CPA has grown to 24 member jurisdictions, including the counties of Los Angeles and Ventura and the cities of Agoura Hills, Alhambra, Arcadia, Beverly Hills, Calabasas, Camarillo, Carson, Claremont, Culver City, Downey, Hawaiian Gardens, Hawthorne, Malibu, Manhattan Beach, Moorpark, Ojai, Paramount, Rolling Hills Estates, Santa Monica, Sierra Madre, Simi Valley, South Pasadena, Temple City, Thousand Oaks, West Hollywood, and Whittier. As of 2018, several more jurisdictions are in the process of joining CPA and membership enrollment is expected to increase throughout the year.

### **Administration and Program Phasing**

With a more robust Board membership, CPA is moving forward with forming its internal team and determining its program operations. The Board established a Chair and Vice-Chair, approved the hire of a permanent Executive Director, proceeded with various contracts for continued legal, personnel, and power procurement services, and is currently forming several ad hoc committees such as Finance, Communications, Legislative Affairs, etc. to facilitate future decision-making.

CPA successfully launched Phase I for Los Angeles County facilities in February 2018 and plans to launch Phase II (commercial, industrial, and non-County municipal accounts) in June 2018 and Phase III (all other accounts, including residential) in December 2018. The purpose of this phasing was to ensure a smooth transition of customer accounts, data, and billings by beginning with a smaller subset of customers and transitioning additional customers to the program throughout the year.

### **Selection of a Default Renewable Energy Tier**

Within the Clean Power Alliance (CPA) structure, each individual city and county member has the authority to select one of the default renewable energy tiers that will be offered to residents and businesses within their jurisdiction. The method by which each member makes this determination is entirely within their own city's purview as there are no legal requirements governing this selection. CPA members have been asked to make their final selection for 2018 on a default renewable energy tier by March 1, 2018. Having this information will allow CPA to better understand the overall program profile and begin procuring energy resources. CPA members will have the opportunity to change their default renewable energy tier once a year. Attachment 2 is a memo from CPA discussing the selection of default tiers and other elements of the program.

Each CPA member will need to select one of three renewable energy tiers as the default product into which their residents and businesses will automatically be enrolled. This default product is the product that customers will receive if they do not make any opt-out, opt-up or opt-down selections. The three products are:

<b>Clean Power Alliance Plan</b>	<b>Net Bill Discount from existing SCE Standard Plans</b>	<b>Net Bill Discount from existing SCE Comparable Plans</b>
36% Renewable, 50% GHG-free	4%	4%
50% Renewable, 50% GHG-free	3%	12%
100% Renewable, 100% GHG-free	-7%**	10%

\*GHG = greenhouse gas

\*\*The negative seven percent represents a cost increase to customers under an existing SCE standard plan.

If a city or county selects 36% renewable as its default tier, then all customers would automatically be enrolled in the 36% renewable product unless individual customers opt-up to either the 50% renewable or 100% renewable products or the customer opt-out to stay with Southern California Edison (SCE). Note that SCE estimates its base renewable tier for 2018 to be 34%; therefore, the 36% default tier offered by CPA is near equivalent to the percent of renewable energy sources currently delivered to West Hollywood customers from SCE.

Alternatively, if the default product is set to 50% renewable, then all customers would automatically be enrolled in the 50% renewable product unless individual customers opt-up to the 100% renewable products, opt-down to the 36% renewable product or the customer opt-out to stay with SCE.

Finally, if the default product is set to 100% renewable, then all customers would automatically be enrolled in the 100% renewable product unless individual customers opt-down to either the 36% renewable or the 50% renewable products or the customer opt-out to stay with SCE.

All CPA default renewable energy tiers will be offered at a discounted rate from comparable SCE plans such as their Green Rate offering. The 36% and 50% default renewable energy tiers will be offered at a discounted rate from SCE's standard plans, while the 100% default renewable energy tier will cost customers seven (7) percent more.

Before automatic enrollment into the program begins, prospective CPA customers will receive two written notices in the mail from the CPA Authority that will explain the program's goals, terms, and conditions and how customers can opt-up, opt-down, or opt-out of the program if desired. These notices will be sent respectively at 60 days and 30 days prior to automatic enrollment. After transfer of service, two additional notices will be sent to CPA customers (at 30 and 60 days after enrollment), notifying them again of the shift from Southern California Edison to CPA, the program details, and the ability to opt-out. Following 60 days after enrollment, a small service charge (less than \$2.00) will be applied to any customer wishing to opt-out.

Staff recommends the City Council select the 100% default renewable energy tier. This tier allows the customers in the City to be powered by the cleanest renewable energy at more competitive price than comparable plans offered by Southern California Edison. This selection also aligns with the City's commitment to reduce its greenhouse gas emissions and lead the way on policies and programs that reinforce climate action and

sound environmental stewardship. Additionally, the program flexibility offered by Clean Power Alliance allows for any customer in West Hollywood that does not want their power sourced at the top tier level to opt-down to the 36% or 50% default renewable tiers or opt-out and stay with Southern California Edison at their discretion. In the past, CCA programs have experienced customer opt-out rates of less than 10%. Lastly, West Hollywood customers enrolled in SCE's bill assistance programs for those of qualifying incomes and special energy rebate programs will still receive such discounts under CPA's program.

### **Communication and Outreach**

In January 2018, CPA issued a request for proposals for qualified firms to perform a variety of marketing and outreach services to its business and residential customers. A general marketing campaign will be conducted, including customer notification and engagement. The campaign will seek to inform and educate customers about CPA and discourage them from opting out of the program. Successful proposers will develop umbrella marketing and outreach material with a unified approach for all 24 member jurisdictions. A contract with the selected consultant team will be finalized by the end of February 2018, with work commencing in March.

The Community Development Department and the Communications Department intend to coordinate design, development, and distribution of City-specific outreach materials to assist in raising public awareness about Clean Power Alliance. These materials, which may include 1-2 Citywide mailers, printed and digital outreach tools, and paid advertising will be designed to appeal to the West Hollywood community and ensure that community members are well-informed of clean renewable energy choices offered by the program. The Communications Department will also utilize all appropriate communications tools including, but not limited to, the City's website, media relations, and social media tools to deliver additional messaging and content about the program through diverse distribution channels.

### **CONFORMANCE WITH VISION 2020 AND THE GOALS OF THE WEST HOLLYWOOD GENERAL PLAN:**

This item is consistent with the Primary Strategic Goal(s) (PSG) and/or Ongoing Strategic Program(s) (OSP) including:

- OSP-1: Adaptability to Future Change.
- OSP-12: Actively Participate in Regional Issues.

In addition, this item is compliant with the following goal(s) of the West Hollywood General Plan:

- IRC-6: Reduce the City's contribution to global climate change and adapt to its effects.

### **EVALUATION PROCESSES:**

The City will monitor participation levels of West Hollywood customers in CPA

throughout the first 12 months of the program.

**ENVIRONMENTAL SUSTAINABILITY AND HEALTH:**

Participation in the Clean Power Alliance will shift the percentage of the City's energy utility powered by clean renewable energy, thereby reducing its overall greenhouse gas emissions and better positioning the City to achieve some of its Climate Action goals.

**COMMUNITY ENGAGEMENT:**

Prior to program launch, a Community Choice Energy program must perform the required noticing to the community regarding the options and incentives available by participating in the program and allow for members of the community to opt out if desired. The City of West Hollywood will work in conjunction with the Clean Power Alliance to ensure that the community is well-informed and up-to-date on the process and program options and supplement CPA's notices with additional information for West Hollywood power customers.

**OFFICE OF PRIMARY RESPONSIBILITY:**

COMMUNITY DEVELOPMENT DEPARTMENT / LONG RANGE & MOBILITY PLANNING DIVISION

**FISCAL IMPACT:**

As the selection of a default renewable energy tier will influence City expenditures, staff approximated the fiscal impact to the City for operating public facilities under each CPA tier rate. The following table highlights the City's 2017 energy use expenditures on its public facilities under the Southern California Edison (SCE) Standard Plan, along with the projected annual expenditures under the three Clean Power Alliance default tiers.

Clean Power Alliance (CPA) Plan	Net Bill Discount from SCE Standard Plan	2017 Annual City Expenditures	Projected Future Annual City Expenditures under CPA*	Savings or Additional Costs to the City
36% Renewable	4%	\$960,347	\$921,933	\$38,414
50% Renewable	3%		\$931,536	\$28,810
100% Renewable	-7%**		\$1,027,571	(\$67,224)

\*Projections are based on 2017 annual city expenditures and are subject to change.

\*\*The negative seven percent represents a cost increase to the City.

The proposed expenditure for communications and outreach for this item, \$50,000 is budgeted for fiscal year 17-18 in account 100-3-07-83-531019 (New Initiatives).

AMOUNT	DESCRIPTION
\$50,000	Funding for this item is already budgeted.

**ATTACHMENT:**

1. September 18, 2017 – Enabling Ordinance and Authorization for Los Angeles Community Choice Energy
2. Clean Power Alliance Memo on Default Renewable Options

**CLEAN POWER ALLIANCE RATEMAKING AND CUSTOMER PHASING TIMELINE**

<b>Date</b>	<b>Action</b>
August 2018 Board Meeting	Board approved Renewable Energy Rate Tiers: <ul style="list-style-type: none"> <li>• 36% Renewables, 50% Renewables, 100% Renewables</li> </ul>
August – October 2018	Members select/maintain default rate option with conservative guidance on savings compared to Southern California Edison <ul style="list-style-type: none"> <li>• Communications materials distributed to members for outreach to residents and businesses</li> </ul>
Early November 2018	SCE files updated rate forecast
November 2018 Board Meeting	Set Residential rates (in time for Dec pre-enrollment notice) <ul style="list-style-type: none"> <li>• Additional customer outreach materials distributed to members</li> </ul>
Early December 2018	Phase 3 (Residential) customer enrollment notice #1 sent 60 days before enrollment
Early January 2019	Phase 3 customer enrollment notice #2 sent 30 days before enrollment
February 1, 2019	Phase 3 launches – all residential customers are enrolled in CPA service
February 2019 Board Meeting	Set Non-residential rates (in time for March pre-enrollment notice)
Early March 2019	Phase 4 (Non-residential) customer enrollment notice #1 sent 60 days before enrollment
Early April 2019	Phase 4 customer enrollment notice #2 sent 30 days before enrollment
May 1, 2019	Phase 4 launches – all remaining non-residential customers are enrolled in CPA service