



ADVICE LETTER SUMMARY

ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: CleanPowerSF

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Shannon Rivers
 Phone #: 415.816.1480
 E-mail: srivers@sflower.org
 E-mail Disposition Notice to: srivers@sflower.org

EXPLANATION OF UTILITY TYPE
 ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

December 18, 2020

Advice Letter (AL) #: 11-E

Tier Designation: 2

Subject of AL: CleanPowerSF February 2021 Month Ahead Resource Adequacy (RA) Request for Waiver of Penalties for Local RA Deficiencies

Keywords (choose from CPUC listing): Local Resource Adequacy Waiver

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.19-06-026

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: NA

Confidential treatment requested? Yes No

If yes, specification of confidential information: See Declaration of Michael A. Hyams and accompanying Matrix
 Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: Shannon Rivers, srivers@sflower.org, 415-816-1480

Resolution required? Yes No

Requested effective date: 1/18/21 No. of tariff sheets: NA

Estimated system annual revenue effect (%): NA

Estimated system average rate effect (%): NA

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: NA

Service affected and changes proposed¹: NA

Pending advice letters that revise the same tariff sheets: NA

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Shannon Rivers
Title: Utility Analyst
Utility Name: CleanPowerSF/SFPUC
Address: 525 Golden Gate Avenue 7th Floor
City: San Francisco
State: California Zip: 94102
Telephone (xxx) xxx-xxxx: (415) 816-1480
Facsimile (xxx) xxx-xxxx:
Email: srivers@sflower.org

Name: William Rostov
Title: Deputy City Attorney
Utility Name: Office of City Attorney Dennis Herrera
Address:
City: San Francisco
State: California Zip: 94102
Telephone (xxx) xxx-xxxx: (415) 554-4700
Facsimile (xxx) xxx-xxxx:
Email: william.rostov@sfcityatty.org

ENERGY Advice Letter Keywords

| | | |
|---------------------------|--|--------------------------------|
| Affiliate | Direct Access | Preliminary Statement |
| Agreements | Disconnect Service | Procurement |
| Agriculture | ECAC / Energy Cost Adjustment | Qualifying Facility |
| Avoided Cost | EOR / Enhanced Oil Recovery | Rebates |
| Balancing Account | Energy Charge | Refunds |
| Baseline | Energy Efficiency | Reliability |
| Bilingual | Establish Service | Re-MAT/Bio-MAT |
| Billings | Expand Service Area | Revenue Allocation |
| Bioenergy | Forms | Rule 21 |
| Brokerage Fees | Franchise Fee / User Tax | Rules |
| CARE | G.O. 131-D | Section 851 |
| CPUC Reimbursement Fee | GRC / General Rate Case | Self Generation |
| Capacity | Hazardous Waste | Service Area Map |
| Cogeneration | Increase Rates | Service Outage |
| Compliance | Interruptible Service | Solar |
| Conditions of Service | Interutility Transportation | Standby Service |
| Connection | LIEE / Low-Income Energy Efficiency | Storage |
| Conservation | LIRA / Low-Income Ratepayer Assistance | Street Lights |
| Consolidate Tariffs | Late Payment Charge | Surcharges |
| Contracts | Line Extensions | Tariffs |
| Core | Memorandum Account | Taxes |
| Credit | Metered Energy Efficiency | Text Changes |
| Curtable Service | Metering | Transformer |
| Customer Charge | Mobile Home Parks | Transition Cost |
| Customer Owned Generation | Name Change | Transmission Lines |
| Decrease Rates | Non-Core | Transportation Electrification |
| Demand Charge | Non-firm Service Contracts | Transportation Rates |
| Demand Side Fund | Nuclear | Undergrounding |
| Demand Side Management | Oil Pipelines | Voltage Discount |
| Demand Side Response | PBR / Performance Based Ratemaking | Wind Power |
| Deposits | Portfolio | Withdrawal of Service |
| Depreciation | Power Lines | |



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T 415.554.0773
cleanpowersf@sfgwater.org

December 18, 2020

California Public Utilities Commission
Energy Division
ATTN: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
E: EDTariffUnit@cpuc.ca.gov

**RE: CleanPowerSF Advice Letter 11-E
Approval of CleanPowerSF's Request for Waiver of Penalties for
Certain Local Resource Adequacy Deficiencies in its February
2021 Month Ahead Filing (PUBLIC VERSION)**

Purpose

CleanPowerSF submits this advice letter seeking California Public Utilities Commission ("CPUC") approval of its request for a waiver of penalties for Local Resource Adequacy capacity deficiencies in its February 2021 Resource Adequacy ("RA") Month Ahead filing, as identified in Confidential Appendix A.

Legal Standard for Waiver Request

In D.06-06-064 as amended by D.07-06-029, D.19-02-022 and most recently by D.20-06-031 the CPUC established a waiver of CPUC-imposed penalties for Local RA deficiencies of its jurisdictional LSEs. Section 24 of the "2021 Filing Guide for System, Local and Flexible Resource Adequacy (RA) Compliance Filings," issued Oct. 2, 2020, ("RA guide") reviews the process an LSE requesting such a waiver must follow. It requires:

CleanPowerSF is a program of the San Francisco Public Utilities Commission (SFPUC), an enterprise department of the City and County of San Francisco.

CleanPowerSF is committed to protecting customer privacy. Learn more at cleanpowersf.org/privacy.

OUR MISSION: To provide our customers with high-quality, efficient and reliable water, power and sewer services in a manner that values environmental and community interests and sustains the resources entrusted to our care.

London N. Breed
Mayor
Sophie Maxwell
President
Anson Moran
Vice President
Tim Paulson
Commissioner
Ed Harrington
Commissioner
Michael Carlin
Acting
General Manager



- (1) a demonstration that the LSE reasonably and in good faith solicited bids for its RAR [Resource Adequacy Requirement] capacity needs along with accompanying information about the terms and conditions of the Request for Offer or other form of solicitation, and
- (2) a demonstration that despite having actively pursued all commercially reasonable efforts to acquire the resources needed to meet the LSE's Local procurement obligation, it either
 - a. Received no bids, or
 - b. Received no bids for an unbundled RA capacity contract of under \$51 per kW-year or for a bundled capacity and energy product of under \$73 per kW-year, or
 - c. Received bids below these thresholds but such bids included what the LSE believes are unreasonable terms and/or conditions, in which case the waiver request must demonstrate why such terms and/or conditions are unreasonable.¹

The RA Guide creates an alternative compliance option in the six disaggregated PG&E Other Local Capacity Areas if

- (a) The LSE makes the required demonstration as part of the current local waiver process through a Tier 2 Advice Letter for its disaggregated PG&E Other local capacity requirements; and
- (b) The LSE, in its Year Ahead compliance filing, demonstrates procurement of local RA capacity within the PG&E Other LCAs such that the LSE's collective procurement in the six disaggregated PG&E Other LCAs meets the LSE's collective requirement for the disaggregated PG&E Other LCAs.²

The LSE will be deemed compliant if the LSE demonstrates that is "made reasonable efforts to procure capacity in the disaggregated PG&E Other areas and procured sufficient resources to meet the aggregated PG&E Other area requirement"³

¹ See RA Guide at 43 (quoting).

² RA Guide at 44 (quoting)

³ *Id.*

Compliance Efforts

1. Previous Advice Letters for Resource Adequacy

CleanPowerSF incorporates by reference Advice Letter 9-E and 10-E to this Advice Letter, outlining efforts taken in advance of the 2021 Year Ahead RA Compliance filing on November 2, 2020 and the January 2021 Month Ahead RA compliance filing.

2. Procurement Efforts Since Year Ahead Filing

CleanPowerSF has reasonably and in good faith solicited bids for its Local RAR capacity needs by being an active participant in the RA market. CleanPowerSF issued a Local RA RFO on December 3, 2020 with bids due on December 7, 2020.⁴ The RFO notice was sent to 600 unique entities.⁵ CleanPowerSF also posted a notice to the CAISO bulletin board on December 3, 2020 seeking to procure additional volumes of Local RA.⁶ Confidential Appendix E shows the bid information and disposition of those bids CleanPowerSF received from the December 3, 2020 RFO.

In addition, CleanPowerSF participated in a third-party solicitation. On November 10, Pacific Gas & Electric Company (“PG&E”) issued a solicitation to sell/buy RA.⁷ CleanPowerSF submitted a bid by the due date on November 17, 2020. PG&E shortlisted CleanPowerSF on December 3, 2020. Confidential Appendix G shows the bid information and the disposition of the bid.

CleanPowerSF has pursued all “commercially reasonable” efforts to acquire its Local RAR and has either (1) received no bids *for the total amount of CleanPowerSF’s Local RAR*, or (2) received no bids for an unbundled RA capacity contract of under \$51 per kW-year or for a bundled capacity and energy product of under \$73 per kW-year for the total amount of CleanPowerSF’s Local RAR.⁸

⁴ See Appendix B Notice of RA Solicitation

⁵ See Appendix C for list of unique entities to which RA RFO was sent.

⁶ See Screen shot of CAISO bulletin board posting, attached Appendix D.

⁷ See Appendix F for PG&E’s Solicitation Materials.

⁸ See Confidential Declaration of Erin B. Mulberg in Support of CleanPowerSF’s Advice Letter 11-E Requesting Waiver of Penalties for Certain Local Resource Adequacy Deficiencies in its February 2021 Month Ahead Filing

3. *Continued Participation in the Market*

CleanPowerSF made all reasonable and good faith efforts to meet its Local RAR in advance of the February 2021 Month Ahead filing requirement, and was able to cure a portion of its Local RA deficiency.⁹ Notwithstanding this waiver request, CleanPowerSF will continue to seek Local RA capacity to cure the deficiencies identified in Confidential Appendix A to Advice Letter 9-E for future Month Ahead filings.

Request

For the above reasons and accompanying Appendices CleanPowerSF requests that the Energy Division approves this request for waiver of penalties, through a decision that:

- Approves CleanPowerSF's requested waiver of penalties for the deficiency amount of Local RA capacity by area for February 2021 as referenced in Confidential Appendix A.

Tier Designation

Tier 2, as required by Ordering Paragraph No. 8 of D.19-06-026.

Effective Date

No later than January 18, 2021 — 30 days after filing.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or email, no later than January 7, 2021, which is twenty days after the filing date. Protests must be submitted to:

CPUC Energy Division
Energy Division Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102
Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above. The protest shall also be sent to CleanPowerSF either via E-mail or delivered to the address shown below on the same date it is mailed or delivered to the Commission:


⁹ See Confidential Appendix A for specifics on extra procurement since CleanPowerSF's AL 9-E.

Shannon Rivers
CleanPowerSF
San Francisco Public Utilities Commission
525 Golden Gate Ave. 7th Floor
San Francisco, CA 94102
E-mail: srivers@sfwater.org

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall set forth the grounds upon which it is based and must be received by the deadline shown above.¹⁰

Notice

In accordance with General Rule 4 of General Order 96-B, a copy of this advice letter is being served to the service list for R.19-11-009.

DocuSigned by:

35042E9A6F0648B...
Michael A. Hyams
Director, CleanPowerSF
San Francisco Public Utilities Commission
525 Golden Gate Ave, 7th Floor
San Francisco, CA 94102
mhyams@sfwater.org
(415) 554-1590

cc: Service List R. 19-11-009

¹⁰ See General Order 96-B, Section 3.11.

CONFIDENTIAL

APPENDIX A

CleanPowerSF Local Capacity Area Resource
Adequacy Request for Waiver of Penalty

APPENDIX B

CleanPowerSF Local RA Solicitation Notice



525 Golden Gate Avenue, 13th Floor
San Francisco, CA 94102
T 415.554.3155
F 415.554.3161
TTY 415.554.3488

**City and County of San Francisco –
Hetch Hetchy Power & CleanPowerSF
Request for Offers
February 1 - December 31, 2021 Resource Adequacy Supplies
December 3, 2020**

Background

The San Francisco Public Utilities Commission (SFPUC) - Power Enterprise is a department of the City and County of San Francisco (CCSF). The SFPUC operates Hetch Hetchy Power, a full-service retail utility, and CleanPowerSF, San Francisco’s Community Choice Aggregation Program, serving commercial and residential customers in the City and County of San Francisco. The SFPUC is a member of the WSPP under the name City and County of San Francisco (CCSF).

The SFPUC issues this Request for Offers (RFO) to purchase Resource Adequacy (RA) supplies delivered in 2021 for **two counterparties**: 1) Hetch Hetchy Power; and 2) CleanPowerSF.

The SFPUC is seeking the following Resource Adequacy products:

- Local + Flexible RA Capacity
 - Bay Area
 - PG&E Other Area:
 - Humboldt
 - North Coast/North Bay
 - Sierra
 - Stockton
 - Fresno
 - Kern

Bids are requested in \$/kW-month as specified in the Bid Workbook – Exhibit A.

The SFPUC is willing to accept offers for simultaneous buy/sell transactions, in which prospective counterparties offer to sell Local and/or Flexible Resource Adequacy Products to the SFPUC, and simultaneously purchase System Resource Adequacy Products from the SFPUC.

Proposal Timing

| | |
|-----------------------|-------------------------------|
| RFO Issued | December 3, 2020 |
| Bids Due | 5:00 PM PDT, December 7, 2020 |
| Notification of Award | December 8, 2020 |

Please submit bids to powerpurchasing@sfgwater.org by **5:00 PM PDT on Monday, December 7, 2020**. **Bids will be evaluated on an ongoing basis and respondents are encouraged to submit bids early.**

On or before December 8, the SFPUC will notify shortlisted sellers of their accepted offers to commence contract negotiations.

Enabling Agreement -- Required amendments to WSPP confirmation:

The SFPUC purchases energy under the WSPP agreement. The resulting transactions from this request shall be executed and confirmed using the WSPP confirmation. The SFPUC requires the following amendments to the confirmation for each counterparty:

Counterparty: Hetch Hetchy Power

- **Guaranteed Maximum Cost.**
 - **Controller Certification.** Buyer's obligations hereunder shall not at any time exceed the amount certified by the Controller for the purpose and period stated in such certification. Except as may be provided by laws governing emergency procedures, officers and employees of Buyer are not authorized to request, and Buyer is not required to reimburse Seller for, commodities or services beyond the agreed upon Transaction scope unless the changed scope is authorized by amendment and approved as required by law. Officers and employees of Buyer are not authorized to offer or promise, nor is Buyer required to honor, any offered or promised additional funding in excess of the maximum amount of funding for which the contract is certified without certification of the additional amount by the Controller. The Controller for the City and County of San Francisco ("Controller") is not authorized to make payments on any contract for which funds have not been certified as available in the budget or by supplemental appropriation.
 - **Biannual Budget Process.** For each City biannual budget cycle during the term of this Confirmation, Buyer agrees it to take all necessary action to will include the maximum amount of its annual payment obligations under this Confirmation in its budget submitted to the City's Board of Supervisors for each year of that budget cycle.
- **Prohibition on Political Activity with City Funds.** In accordance with San Francisco Administrative Code Chapter 12.G, Seller may not participate in, support, or attempt to influence any political campaign for a candidate or for a ballot measure in San Francisco (collectively, "Political Activity") in the performance of this Agreement. Seller agrees to comply with San Francisco Administrative Code Chapter 12.G and any implementing rules and regulations promulgated by the Controller. The terms and provisions of Chapter 12.G are incorporated herein by this reference. In the event Seller violates the provisions of this Section, Buyer may, in addition to any other rights or remedies available hereunder, (i) terminate this Agreement, and (ii) prohibit Seller from bidding on or receiving any new City contract for a period of two years. The Controller will not consider Seller's use of profit as a violation of this Section.
- **Nondiscrimination Requirements.**
 - Seller shall comply with the provisions of Chapter 12B of the San Francisco Administrative Code. Seller shall incorporate by reference in all subcontracts the provisions of Sections 12B.2(a) and 12B.2(c)-(k) of the San Francisco Administrative Code and shall require all subcontractors to comply with such provisions. Seller is subject to the enforcement and penalty provisions in Chapters 12B and 12C.
 - Seller represents that it does not as of the date of this Agreement, and will not during the term of this Agreement, in any of its operations in the City of San Francisco, on real property owned by the City, or where work is being performed for the Buyer elsewhere in the United States, discriminate in the provision of employee benefits between employees with domestic partners and employees with spouses and/or between the domestic partners and spouses of such employees, subject to the conditions set forth in San Francisco Administrative Code Section 12B.2.
- **Compliance with Laws.** Each Party shall keep itself fully informed of all applicable federal, state, and local laws, ordinances, or regulations that in any manner affect the performance of this Agreement, and must at all times comply with all such laws, ordinance, or regulations they may be amended from time to time.

- Section 24 of the WSPP Agreement is deleted and replaced with the following: “This WSPP Agreement and any Confirmation shall be governed by and construed, enforced and performed in accordance with the laws of the State of California, without regard to principles of conflicts of law.”
- City Vendor Requirements. Notwithstanding any other provision of this Agreement, Buyer shall not be deemed to be in default of this Agreement and no Late Payment Penalty shall be assessed if an invoice under this Agreement cannot be processed by Buyer due to Seller’s failure to comply with all applicable City requirements for City contractors, including but not limited to certification of vendors under Chapter 12 of the San Francisco Administrative Code, payment of business license fees or taxes, insurance requirements, registration in the City’s vendor payment processing system, or any other current or future City requirement for vendor payment processing. Seller understands and acknowledges that vendor certifications may include annual renewals and additional certification requirements may apply to assignees or changes in ownership or control of Seller.

Counterparty: CleanPowerSF

- **Guaranteed Maximum Cost.**
 - **Controller Certification.** Buyer’s obligations hereunder shall not at any time exceed the amount certified by the Controller for the purpose and period stated in such certification. Except as may be provided by laws governing emergency procedures, officers and employees of Buyer are not authorized to request, and Buyer is not required to reimburse Seller for, commodities or services beyond the agreed upon Transaction scope unless the changed scope is authorized by amendment and approved as required by law. Officers and employees of Buyer are not authorized to offer or promise, nor is Buyer required to honor, any offered or promised additional funding in excess of the maximum amount of funding for which the contract is certified without certification of the additional amount by the Controller. The Controller for the City and County of San Francisco (“Controller”) is not authorized to make payments on any contract for which funds have not been certified as available in the budget or by supplemental appropriation.
 - **Biannual Budget Process.** For each City biannual budget cycle during the term of this Confirmation, Buyer agrees it to take all necessary action to will include the maximum amount of its annual payment obligations under this Confirmation in its budget submitted to the City’s Board of Supervisors for each year of that budget cycle.
- **Designated Fund.**
 - **Auto-Appropriating Designated Fund.** Buyer’s obligations under this Confirmation shall be paid from a SFPUC designated fund that will automatically appropriate CleanPowerSF revenues on an annual basis without further action and which shall be used solely for CleanPowerSF’s costs and expenses, including the Buyer’s obligations under this Confirmation. Buyer agrees to set CleanPowerSF’s rates and charges that are sufficient to maintain revenues necessary to pay all of Buyer’s payment obligations under its contracts for the purchase of energy or energy related products for CleanPowerSF. Buyer shall provide Seller with reasonable access to account balance information with respect to the CleanPowerSF designated fund at all times during the Delivery Period.
 - **Limited Obligations.** Buyer’s obligations under this Confirmation are special limited obligations of CleanPowerSF payable solely from the revenues of CleanPowerSF. The obligations are not a charge upon the revenues or general fund of the SFPUC or the City or upon any non-CleanPowerSF moneys or other property of the SFPUC or the City.
- **Prohibition on Political Activity with City Funds.** In accordance with San Francisco Administrative Code Chapter 12.G, Seller may not participate in, support, or attempt to influence any political campaign for a candidate or for a ballot measure in San Francisco (collectively, “Political Activity”) in the performance of this Agreement. Seller agrees to comply with San Francisco Administrative Code Chapter 12.G and any implementing rules and regulations promulgated by the Controller. The terms and provisions of Chapter 12.G are incorporated herein by this reference. In the event

Seller violates the provisions of this Section, Buyer may, in addition to any other rights or remedies available hereunder, (i) terminate this Agreement, and (ii) prohibit Seller from bidding on or receiving any new City contract for a period of two years. The Controller will not consider Seller's use of profit as a violation of this Section.

- **Nondiscrimination Requirements.**
 - Seller shall comply with the provisions of Chapter 12B of the San Francisco Administrative Code. Seller shall incorporate by reference in all subcontracts the provisions of Sections 12B.2(a) and 12B.2(c)-(k) of the San Francisco Administrative Code and shall require all subcontractors to comply with such provisions. Seller is subject to the enforcement and penalty provisions in Chapters 12B and 12C.
 - Seller represents that it does not as of the date of this Agreement, and will not during the term of this Agreement, in any of its operations in the City of San Francisco, on real property owned by the City, or where work is being performed for the Buyer elsewhere in the United States, discriminate in the provision of employee benefits between employees with domestic partners and employees with spouses and/or between the domestic partners and spouses of such employees, subject to the conditions set forth in San Francisco Administrative Code Section 12B.2.
- **Compliance with Laws.** Each Party shall keep itself fully informed of all applicable federal, state, and local laws, ordinances, or regulations that in any manner affect the performance of this Agreement, and must at all times comply with all such laws, ordinance, or regulations they may be amended from time to time.
- **Section 24 of the WSPP Agreement is deleted and replaced with the following:** "This WSPP Agreement and any Confirmation shall be governed by and construed, enforced and performed in accordance with the laws of the State of California, without regard to principles of conflicts of law."
- **City Vendor Requirements.** Notwithstanding any other provision of this Agreement, Buyer shall not be deemed to be in default of this Agreement and no Late Payment Penalty shall be assessed if an invoice under this Agreement cannot be processed by Buyer due to Seller's failure to comply with all applicable City requirements for City contractors, including but not limited to certification of vendors under Chapter 12 of the San Francisco Administrative Code, payment of business license fees or taxes, insurance requirements, registration in the City's vendor payment processing system, or any other current or future City requirement for vendor payment processing. Seller understands and acknowledges that vendor certifications may include annual renewals and additional certification requirements may apply to assignees or changes in ownership or control of Seller.

How to Respond

- Preference will be given to entities that are a WSPP member or have an existing Master Agreement in place with either counterparty.
- Provide information summarizing your specific bid(s) by completing Exhibit A.
- Attach any additional information relevant to your bid.
- SFPUC Origination and Power Supply staff will respond with an email to confirm your bid has been received.
- **Responses and/or questions should be addressed to: powerpurchasing@sfgwater.org**

Post-Response Negotiations

SFPUC reserves the right to enter into discussions with respondent to gain clarity on its bid, or to suggest a partial amendment to the offer.

Disclaimer and Confidentiality

SFPUC reserves the right, without qualification and in its sole discretion, to reject any or all offers, accept multiple bids, and to terminate this request for bid in whole or in part at any time. Without limiting the



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TTY 415.554.3488

foregoing, SFPUC further reserves the right in its sole discretion, to decline to enter into any agreement with any counterparty for any reason.

It is not SFPUC's intent to publicly disclose individual respondent proprietary information obtained in response to this request. This request is intended to provide information for SFPUC to select a bid to purchase energy, it should NOT be construed as a commitment by SFPUC to enter into a contractual agreement, nor will SFPUC pay for information solicited.

APPENDIX C

CleanPowerSF RA RFO Notices Unique Entity Contact List

CleanPowerSF distributed the above RFOs to the following list of unique entities:

CleanPowerSF RFO Supplier Distribution List

| | |
|---|---|
| 1st Light Energy | Greta Group |
| 3 Phases Renewables | Grid Bright |
| 3Degrees | GridSME |
| 8minutenergy | Gridwell Consulting |
| 8minutenergy Renewables | Hanergy America |
| ABACUS | Harron LLC |
| Aces | IEPA |
| ACT Commodities | IID |
| adaptiveARC | Intersect Power |
| AEP Energy Partners | JTN Energy |
| AES Distributed Energy | Just Energy |
| Agera Energy | Kelson Energy |
| Alameda Municipal Power | KFW Law |
| Alcoa Power Marketing LLC | KL Gates |
| AltaGas San Joaquin Energy Inc | LADWP |
| Altai Renewables | Large Scale Solar |
| Amazon | Lendlease |
| American Power Net | Liberty Power |
| American Renewable Power | Liberty Power Corp |
| Anaheim | Lodi |
| Apple Valley Choice Energy | LS Power |
| Atlas Renewable Power | MCE |
| Austin Wentworth Household | Merced ID |
| Avangrid Renewables | Middle River Power, LLC |
| AW-Energy Oy | Monterey Bay Community Power |
| Barovich and Yap | Morgan Lewis |
| Bay Area Rapid Transit | Morgan Stanley |
| BayWa r.e. Solar Projects | Mothership Energy Group |
| BBK Law | Mundo Investments |
| BGC Environmental Brokerage Services | MWR |
| BGC Partners | Natural Fiber Resources LLC |
| Black Bear Energy | Nevada Irrigation District |
| Bloom Energy | NewFields |
| Boston Energy Trading and Marketing, LLC | NextEnergy |
| BP Energy Co. | Nextera Energy |
| Braun Blaising Smith Wynne | Northern California Power Agency (NCPA) |
| Brookfield Energy Marketing LP | Nrg Energy Center S F Llc |
| Buchalter | NRG Renewables |

| | |
|--|---|
| CAISO | Ohm Connect |
| CalChoice | Opinion Dynamics |
| California Dept. of Water Resources | Origis Energy |
| California Energy Markets | Ormat |
| California Public Utilities Commission (CPUC) | Oscar Santos Household |
| California Resources Corporation | Pacific Energy Advisors, Inc. |
| Calpine Corporation | Pacific Gas and Electric Company (PG&E) |
| CalWEA | Panasonic |
| Candela Renewables | Pattern Energy |
| CBECal | Peninsula Clean Energy |
| CEDMC | PG&E |
| CEERT | Pilot Power Group |
| Centauri Energy | Pioneer Community Energy |
| CES Ltd | Placer County Water Agency |
| Citi Group | Port of Oakland |
| City of Anaheim | Powerex Corp. |
| City of Azusa | Public Power Council |
| City of Banning | Recurrent Energy |
| City of Colton | Renewable Energy Systems (RES) |
| City of Palo Alto | ReNewAll |
| City of Pasadena | Reterro |
| City of Santa Clara Department of Public Utilities | Riverside |
| City of Vernon | Rockland Capital |
| Clean Energy Collective | Rocky Mountain Institute |
| Clean Line Energy Partners | RPS Advisors |
| Clean Power Alliance | RTO Advisors |
| Clean Power Energy Management | San Diego Gas & Electric |
| Clearway Energy Group | San Jose Clean Energy |
| Clenera | SCD Energy |
| Cogentrix | Scout Clean Energy |
| ConocoPhillips Company | Sempra Renewables |
| Constellation Energy Commodities Group | Shell Energy North America |
| Coronal Energy | Sierra Club |
| CRC | Silicon Valley Clean Energy |
| Cypress Creek Renewables | Silicon Valley Power |
| Dentons | SMUD |
| Diamond Generating | Smyers |
| Direct Energy Business | Solar City |
| DMC Advisors | Solar Electric Solutions |
| DTE Energy Trading | Solar Frontier Americas |
| Duke Energy | Solar Provider Group |

| | |
|---|--|
| Dynegy | Sonoma Clean Power |
| E.ON Climate & Renewables North America | South Feather Water and Power |
| Earth Justice | Southern California Edison |
| East Bay Community Energy | Southern Power Company |
| East Bay Municipal Utility District | Southwestern Power Group |
| EDF Renewable Energy | Spower |
| EDF Trading | Stoel Rives LLP |
| Edms-llc | Storage Alliance |
| EDP Renewables North America | Strata Solar |
| EES Consulting | STX Services B.V. |
| ELSYS, Inc | Sunpin Solar |
| EMF | SunPower |
| Enbridge Inc. | Tenaska Power Services |
| Endurance Wind Power | Terra-Gen |
| Enel X | Tesla, Inc. |
| Energy Attorney | The Energy Authority |
| Energy Hub | The Utility Reform Network |
| Energy Visions | Thompson Coburn |
| EnerNOC, Inc. | Tiger Natural Gas |
| Engie | Tosdal Law Firm |
| Eq-research | TRANE |
| ESLawFirm | Transalta Corporation |
| Evolution Markets | Tullett Prebon |
| EVP Development | U.S. Geothermal |
| EWT Americas | Union of Concerned Scientists |
| FIRM clean energy | University of California, Office of the President (UCOP) |
| First Solar | Wadham Energy |
| Flynnrci | Water CA |
| Frontier Energy | Wellhead |
| Frontier Renewables | Western Area Power Administration |
| Ge | Western Energy and Water |
| Genon | Westlands Solar Park |
| Gexa Energy | Wind Wall Development |
| Gladstein, Neandross & Associates LLC | Winston |
| Glendale | Woodruff Expert Services |
| Good Company Associates | Y Lehr Household |
| Goodin Mac Bride | Yuba County Water Agency |
| Grande Vista Energy | |

APPENDIX D

CAISO Bulletin Board Posting

From: [Jones, Sunita K](#)
To: [Jackson, Shamica](#); [Mulberg, Erin](#)
Cc: [Power Scheduler](#); [Power Origination](#); [Hvams, Michael](#); [Gustafson, Benjamin](#)
Subject: RE: CAISO bulletin posting - February 1 – December 31, 2021
Date: Thursday, December 3, 2020 4:17:48 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)



SUNITA JONESx959

[Home](#) / [Buying](#)

CleanPowerSF Seeking Feb1-Dec31 2021 Local RA

**SUNITA
JONESx959**

Posts: 5

0 seconds ago

CleanPowerSF is seeking to purchase Resource Adequacy (RA) products in February 1 – December 31, 2021 to comply with Local Resource Adequacy Requirements ("RAR") through this Request for Offers ("RFO").

Requested Capacity Products and Volumes - CleanPowerSF is seeking offers to purchase the following Products and Terms:

Local + Flexible RA Capacity:

Bay Area

PG&E Other Local Area:

- Humboldt
- North Coast/North Bay
- Sierra
- Stockton
- Fresno
- Kern

CleanPowerSF prefers offers that include Flexible Capacity Rights and offers of at least 1 MW.

CleanPowerSF will consider any part or all of the products and volumes.

Solicitation Process:

Please submit bids to powerpurchasing@sfgwater.org by 5:00 PM PDT on Monday, December 8, 2020. Bids will be evaluated on an ongoing basis and respondents are encouraged to submit bids early.

[REPORT TO MODERATOR](#) [EDIT](#) [DELETE](#)

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APPENDIX E

CleanPowerSF's RA RFO Bid
Information

APPENDIX F

Pacific Gas & Electric's November 10, 2020
RA RFO Solicitation Materials

From: [RA Solicitations](#)
To: [RA Solicitations](#)
Cc: [Charles Janecek](#)
Subject: PG&E RA and Import Energy E-Solicitation
Date: Tuesday, November 10, 2020 6:05:59 PM
Attachments: [EEI Import Allocation Rights Confirm.docx](#)
[EEI RA Confirm.docx](#)

CAUTION: This email originated from **outside** of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To Prospective Participant:

Pacific Gas and Electric Company (“PG&E”) invites your participation in its Resource Adequacy (“RA”) and Import Energy Electronic Solicitation.

PG&E is seeking the following proposals:

| Product | PG&E is Seeking to | Minimum Volume | Delivery Period | Pricing |
|---------------------------------|----------------------------------|----------------|---|---|
| System RA | Buy, Sell, Simultaneous Buy/Sell | 1 MW | Feb 2021 – Dec 2021 | Fixed Price \$/kW-month |
| Local RA | Buy, Sell, Simultaneous Buy/Sell | 1 MW | Feb 2021 –Dec 2021 PG&E will also entertain proposals to sell to PG&E for 2022 | Fixed Price \$/kW-month |
| Import Allocation Rights (IARs) | Sell | 1 MW | Feb – Dec 2021 | Fixed Price \$/kW-month |
| Import Energy * | Buy | 5 MW | Feb – Dec 2021 | CAISO LMP, ICE Index, or Fixed Price \$/MWh |

**PG&E’s preference is to transact Import Energy indexed to CAISO LMP, but PG&E will consider offers for ICE Indexed or Fixed Prices transactions too.*

The deadline to submit a response is 5:00 pm (PPT), Tuesday, November 17, 2020.

This email describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this Electronic Solicitation.

1. Master Agreement and Confirmations

PG&E will transact RA and IAR products under an EEI Master Agreement. The executed Master

Agreement shall govern transactions entered into pursuant to this Electronic Solicitation, including transaction details agreed to in any RA or IAR Confirmation Agreement (“Confirmation”).

PG&E’s provides the attached RA and IAR Confirmations that set forth the terms and conditions to create and define the Products to be transacted. The Confirmations require participants to comply with the RA requirements as implemented by both the California Public Utilities Commission and the California Independent System Operator. The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed “Undelivered Energy”. PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

Any Import Energy transaction must be compliant with CPUC decision D.20-06-028. PG&E will discuss necessary requirements with interested sellers.

2. Submitting Offers and Bids

PG&E will circulate the Offer and Bid form to all participants later this week. Interested participants should submit the Offer and Bid Form. If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 1 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

All bids and offers for RA or IARs included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh for those products as part of this solicitation. PG&E will consider RA and IAR offers and bids final. PG&E may consider refreshed pricing for Import Energy offers, especially if those offers are fixed price.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox (RASolicitations@pge.com), with a copy to the Independent Evaluator Charles Janecek (Charles.Janecek@PACONSULTING.COM) by the deadline indicated in Table 1. Telephonic, hardcopy, or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

3. Schedule for Offers and Bids

The table below provides the tentative schedule for this Electronic Solicitation, which is subject to change at PG&E's discretion.

Table 1

| Event | Target Deadline |
|--|---------------------------|
| PG&E launches e-solicitation | Tuesday 11/10 |
| Offers and Bids due | 5 pm (PPT) Tuesday, 11/17 |
| PG&E consults with its PRG regarding its proposed shortlist. | Friday, 11/20 |
| PG&E notifies participants of shortlist status | Tuesday, 11/24 |
| Deadline for notified shortlisted participants to accept shortlist status and final volumes, and return partially executed confirmation(s) | Monday, 11/30 |
| Target full execution of confirmations | Friday, 12/4 |

4. Contact Information

Questions regarding this solicitation and process should be addressed to the PGE RA Solicitations mailbox RASolicitations@pge.com, with a copy to the Independent Evaluator Charles Janecek (Charles.Janecek@PACONSULTING.COM).

5. Disclaimers

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

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APPENDIX G

CleanPowerSF's Participation in Pacific Gas &
Electric's November 10, 2020 RA RFO

CONFIDENTIAL

DECLARATION OF ERIN B. MULBERG IN
SUPPORT OF CLEANPOWERSF'S ADVICE
LETTER 11-E REQUESTING WAIVER OF
PENALTIES FOR CERTAIN LOCAL
RESOURCE ADEQUACY DEFICIENCIES
IN ITS FEBRUARY 2021 MONTH AHEAD
FILING



California
Public Utilities
Commission



[CPUC Home](#)

CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: R1911009 - CPUC - OIR TO OVERSE
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: DECEMBER 17, 2020

[Download the Comma-delimited File](#)
[About Comma-delimited Files](#)

[Back to Service Lists Index](#)

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**BEFORE THE BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Forward Resource Adequacy Procurement Obligations.

R.19-11-009
(Filed November 7, 2019)

CERTIFICATE OF SERVICE

I, Paula Fernandez, declare that I am an employee of the City and County of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action. My business address is City and County of San Francisco, Office of the City Attorney, 1 Dr. Carlton B. Goodlett Place, Room 234, San Francisco, CA 94102.

On **December 18, 2020**, I served: 1) **CleanPowerSF Advice Letter 11-E Approval of CleanPowerSF's Request for Waiver of Penalties for Certain Local Resource Adequacy Deficiencies in its February 2021 Month Ahead Filing (PUBLIC VERSION)**; and 2) **Declaration Of Michael A. Hyams In Support Of Confidential Treatment Of Data And Information Contained In CleanpowerSF's Advice Letter 11-E** via electronic mail, on all parties in Proceeding No. **R.19-11-009**.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on **December 18, 2020** in San Francisco, California.

/s/ Paula Fernandez
Paula Fernandez

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Forward Resource Adequacy Procurement Obligations.

R.19-11-009
(Filed November 7, 2019)

**DECLARATION OF MICHAEL A. HYAMS IN SUPPORT OF CONFIDENTIAL
TREATMENT OF DATA AND INFORMATION CONTAINED IN CLEANPOWERSF'S
ADVICE LETTER 11-E**

I, Michael A. Hyams declare and state:

1. I am the Director of CleanPowerSF. As such, I have responsibility and oversight of CleanPowerSF's energy procurement, policy, compliance, and reporting. CleanPowerSF is the community choice aggregator ("CCA") for the City and County of San Francisco.
2. I have been authorized by Barbara Hale, Assistant General Manager for Power of the San Francisco Public Utilities Commission, to make this Declaration on behalf of CleanPowerSF.
3. I am making this Declaration in accordance with California Public Utilities Commission (Commission) Decision (D.) 06-06-066, D.08-04-023, D.20-07-005, and General Order (GO) 66-D which govern the submission of confidential, market-sensitive energy procurement information to the Commission.
4. Attachment A to this Declaration contains a table identifying the data and information for which CleanPowerSF seeks confidential treatment. Attachment A is incorporated by reference in its entirety into this Declaration.

5. The table specifies that the material CleanPowerSF seeks to protect constitutes confidential, market-sensitive data and information covered by D.06-06-066, D.08-04-023, D.20-07-005, and the ESP Confidentiality Matrix.
6. The Commission has granted confidential treatment of the same information in both its Resource Adequacy (R.17-09-020) and Integrated Resource Planning (R.16-02-007) proceedings.¹ In each of those proceedings, the Administrative Law Judge (ALJ) acknowledged that D.06-06-066 and D.08-04-023 apply to CCAs in a manner similar to investor-owned utilities (IOUs) and energy service providers (ESPs), even though the accompanying Confidentiality Matrices apply specifically to IOUs and ESPs.²
7. As demonstrated in the attached table, the categories of information for which CleanPowerSF seeks confidential protection are consistent with categories of information that are treated as confidential for ESPs, and are reasonably tailored to address confidentiality concerns.
8. In addition, the Commission has discretion to determine whether the public interest in keeping confidential materials confidential outweighs the public interest in making them public.³
9. The Commission has also determined that data that does not fall precisely within a Confidentiality Matrix category but which “consists of information from which [Matrix

¹ R. 17-09-020, *Administrative Law Judge’s Ruling Granting California Community Choice Association’s Request to Submit Information Under Seal* (May 18, 2018); R.16-02-007, *Joint Ruling of Assigned Commissioner and Administrative Law Judge Granting 29 Motions to File Under Seal, Seeking Comment on Future Confidentiality Treatment, and Confirming No Evidentiary Hearing Will be Held on Individual Integrated Resource Plans* (October 5, 2018).

² R. 17-09-020, *Administrative Law Judge’s Ruling Granting California Community Choice Association’s Request to Submit Information Under Seal* (May 18, 2018), and R.16-02-007, *Administrative Law Judge’s Ruling Granting, In Part, and Denying, In Part, Motion of Sonoma Clean Power Authority to Submit Information Under Seal*, p. 4 (July 26, 2018).

³ D.06-06-066, as modified by D.07-05-032, pgs. 5-6. “[T]he test for non-disclosure to the public includes whether ‘the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.’ (See e.g., Gov. Code, §6255, subd. (a).)”

category] information may be easily derived” is eligible for the confidential treatment specified in the corresponding Confidentiality Matrix category.⁴

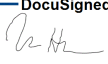
10. The attached table specifies the data and information for which CleanPowerSF seeks confidential treatment, the protected categories of information under which the data and information fall, and why confidential treatment is justified.
11. CleanPowerSF is complying with the limitations on confidentiality specified for the particular type of data, as listed in the table.
12. The data and information listed in the table are not already public, and due to the format of the reporting templates cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure.
13. I have personal knowledge of the facts and representations herein, except for those facts expressly stated to be based upon information and belief, and as to those matters, I believe them to be true.
14. Based on the foregoing, I make this Declaration supporting the confidential treatment of data and information contained in CleanPowerSF’s Advice Letter 11-E and related documents, submitted on December 18, 2020.
15. Due to the recurring nature of RA Compliance Filings and the nature of the local RA waiver request, this Declaration will also be referenced in CleanPowerSF’s monthly RA compliance filings for 2021. This Declaration extends to future RA compliance filings pursuant to D.08-04-023, section 4.2.6, and Ordering Paragraph 9.⁵

⁴ See, e.g., R.06-05-027, *Administrative Law Judge's Ruling on San Diego Gas & Electric Company's April 3, 2007 Motion to File Data Under Seal*, p. 2 (May 4, 2007).

⁵ D.08-04-023, pp. 20, 28 (Ordering Paragraph No.); *see also* 2021 Filing Guide for System, Local and Flexible Resource Adequacy (RA) Compliance Filings, R.19-11-009 (Issued October 2, 2020), p. 27.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on December 18, 2020, at San Anselmo, California.

DocuSigned by:

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DECLARATION OF MICHAEL A. HYAMS IN SUPPORT OF CONFIDENTIAL TREATMENT OF DATA AND INFORMATION
CONTAINED IN CLEANPOWERSF'S ADVICE LETTER 11-E (DATED DECEMBER 18, 2020)
ATTACHMENT A – TABLE OF CONFIDENTIAL INFORMATION

| CleanPowerSF Advice Letter 11-E (and attachments) | | | |
|--|--|--|--|
| Confidential Data or Information | Category from D.06-06-066, D.08-04-023 | Justification for Confidential Treatment | Length of Time for Data to be Treated as Confidential |
| <p>Confidential Appendix A (CleanPowerSF Local Capacity Area Resource Adequacy Waiver Request)</p> <p>CleanPowerSF's specific area, month and capacity waiver requests as identified by the amount of deficiency.</p> | <p>ESP Matrix § II.B (Supply data (both year ahead and month ahead).</p> <p>General Order 66-D, specifically Government Code section 6255(a) (regarding the public interest exemption under the California Public Records Act.</p> | <p>The specified information from this appendix corresponds to the listed ESP Confidentiality Matrix categories and constitutes confidential and highly-sensitive market information. Disclosure of such information would enable any interested person to identify CleanPowerSF's procurement requirements, RA position, and detailed RA capacity supply data. Consistent with D.06-06-066,D.08-04-023, and D.20-07-005, this information should be protected as confidential, market-sensitive information.</p> <p>In addition, release of this information would compromise the available markets for capacity, and allow dominant market participants to exercise market power and manipulate compliance with the Commission's RA program. As a consequence, there would be a severe negative impact on the ability of CleanPowerSF to negotiate and procure RA capacity on terms reasonable for its ratepayers. The public interest served by disclosing this information is clearly outweighed by the public interest in withholding such information from disclosure, given the sensitivity of the information and the potential harm that would be caused by its disclosure.</p> | <p>Through December 31, 2023</p> |

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| <p>Confidential Appendix E (CleanPowerSF’s Received Bid Information and Disposition of RA Solicitations)</p> <ul style="list-style-type: none"> Entire Workbook | <p>ESP Matrix §§ II.A (Detailed load forecasts (both year ahead and month ahead)); II.B (Supply data (both year ahead and month ahead)); III.B. (Total Peak Load Forecast (MW)); and III.D. (Total Peak Demand Load Forecast (MW)).</p> <p>General Order 66-D, specifically Government Code section 6254(k) and Evidence Code sections 1040 (regarding “official information”) and 1060 (regarding “trade secrets”); and Government Code section 6255(a) (regarding the public interest exemption under the California Public Records Act)</p> | <p>The specified information from this Appendix corresponds to the listed ESP Confidentiality Matrix categories; it includes confidential and highly-sensitive market information. Disclosure of such valuable market information would enable any interested person to identify CleanPowerSF’s procurement requirements and open RA position, the availability of RA supply in the market, and bid price information. Bid price information, in particular, is highly confidential and market-sensitive. If released, this information would allow market participants to severely compromise the capacity markets, and consequently, negatively impact the ability of CleanPowerSF to procure resource adequacy capacity on terms favorable to its ratepayers.</p> <p>In addition, release of this information would compromise the available markets for capacity, and allow dominant market participants to exercise market power and manipulate compliance with the Commission’s RA program. As a consequence, there would be a severe negative impact on the ability of CleanPowerSF to negotiate and procure RA capacity on terms reasonable for its ratepayers. The public interest served by disclosing this information is clearly outweighed by the public interest in withholding such information from disclosure, given the sensitivity of the information and the potential harm that would be caused by its disclosure. This information should be protected as confidential, market-sensitive information.</p> | <p>Through December 31, 2023</p> |
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| | | <p>Further, bid quantity and bid price information submitted by bidders was obtained by the City and County of San Francisco under an expectation of confidentiality.</p> <p>The specified information is also proprietary trade secret information because it has economic value from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.</p> | |
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| <p>Confidential Appendix G (CleanPowerSF bid information and the disposition of the bid in Pacific Gas & Electric's November 17, 2020 RA Solicitation)</p> <ul style="list-style-type: none"> Entire Workbook (except instructions and contact information tabs). | <p>ESP Matrix §§ II.A (Detailed load forecasts (both year ahead and month ahead)); II.B (Supply data (both year ahead and month ahead)); III.B. (Total Peak Load Forecast (MW)); and III.D. (Total Peak Demand Load Forecast (MW)).</p> <p>General Order 66-D, specifically Government Code section 6254(k) and Evidence Code sections 1060 (regarding "trade secrets"); and Government Code section 6255(a) (regarding the public interest exemption under the California Public Records Act)</p> | <p>The specified information from this Appendix corresponds to the listed ESP Confidentiality Matrix categories; it includes confidential and highly-sensitive market information. Disclosure of such valuable market information would enable any interested person to identify CleanPowerSF's procurement requirements and open RA position, the availability of RA supply in the market, and bid price information. Bid price information, in particular, is highly confidential and market-sensitive. If released, this information would allow market participants to severely compromise the capacity markets, and consequently, negatively impact the ability of CleanPowerSF to procure resource adequacy capacity on terms favorable to its ratepayers.</p> <p>In addition, release of this information would compromise the available markets for capacity, and allow dominant market participants to exercise market power and manipulate compliance with the Commission's RA program. As a consequence, there would be a severe negative impact on the ability of CleanPowerSF to negotiate and procure RA capacity on terms reasonable for its ratepayers. The public interest served by disclosing this information is clearly outweighed by the public interest in withholding such information from disclosure, given the sensitivity of the information and the potential harm that would be caused by its disclosure. This information should be protected as confidential, market-sensitive information.</p> | <p>Through December 31, 2023</p> |
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| | | <p>The specified information is also proprietary trade secret information because it has economic value from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.</p> | |
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| <p>Declaration of Erin B. Mulberg in Support of CleanPowerSF's Advice Letter 11-E Requesting Waiver of Penalties for Certain Local Resource Adequacy Deficiencies in its February 2021 Month Ahead Filing</p> | <p>ESP Matrix §§ II.A (Detailed load forecasts (both year ahead and month ahead)); II.B (Supply data (both year ahead and month ahead)); III.B. (Total Peak Load Forecast (MW)); and III.D. (Total Peak Demand Load Forecast (MW)).</p> <p>General Order 66-D, specifically Government Code section 6254(k) and Evidence Code sections 1040 (regarding "official information") and 1060 (regarding "trade secrets"); and Government Code section 6255(a) (regarding the public interest exemption under the California Public Records Act)</p> | <p>The specified information from this Appendix corresponds to the listed ESP Confidentiality Matrix categories; it includes confidential and highly-sensitive market information. Disclosure of such valuable market information would enable any interested person to identify CleanPowerSF's procurement requirements and open RA position, the availability of RA supply in the market, and bid price information. Bid price information, in particular, is highly confidential and market-sensitive. If released, this information would allow market participants to severely compromise the capacity markets, and consequently, negatively impact the ability of CleanPowerSF to procure resource adequacy capacity on terms favorable to its ratepayers.</p> <p>In addition, release of this information would compromise the available markets for capacity, and allow dominant market participants to exercise market power and manipulate compliance with the Commission's RA program. As a consequence, there would be a severe negative impact on the ability of CleanPowerSF to negotiate and procure RA capacity on terms reasonable for its ratepayers. The public interest served by disclosing this information is clearly outweighed by the public interest in withholding such information from disclosure, given the sensitivity of the information and the potential harm that would be caused by its disclosure. This information should be protected as confidential, market-sensitive information.</p> | <p>Through December 31, 2023</p> |
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| | | <p>The specified information is also proprietary trade secret information because it has economic value from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.</p> | |
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