

June 13, 2019

CA Public Utilities Commission  
Energy Division  
Attention: Tariff Unit  
505 Van Ness Ave., 4th Floor  
San Francisco, CA 94102-3298  
E-mail: EDTariffUnit@cpuc.ca.gov

Re: **CleanPowerSF Advice Letter (AL) # 4  
Compliance Submittal for CleanPowerSF 2018 Integrated  
Resource Plan Certification in R.16-02-007**

### Purpose

In compliance with Ordering Paragraph No. 6 of Decision (“D.”) 19-04-040, CleanPowerSF submits supplemental information to CleanPowerSF’s August 1, 2018 Integrated Resource Plan (“IRP”). Attached hereto are estimates of criteria pollutant emissions associated with generation used to serve the load in the IRP portfolio (Attachment 1) and clarification of the disadvantaged communities served by CleanPowerSF (Attachment 2).

### Background

On August 1, 2018, CleanPowerSF filed its IRP with the Commission requesting certification. In D.19-04-040, the Commission found that CleanPowerSF’s IRP was not yet certified because CleanPowerSF did not provide information regarding criteria pollutant emissions associated with the IRP’s portfolio.<sup>1</sup>

The Commission provided CleanPowerSF an opportunity to obtain certification by correcting this deficiency.<sup>2</sup> The Commission ordered CleanPowerSF to “[p]rovide best available estimates of emissions of nitrogen oxides and particulate matter associated with all emitting resources used to serve load,

<sup>1</sup> D.19-04-040 pp. 20-21; *see also* p. 30.

<sup>2</sup> D.19-04-040, p. 177, Ordering Paragraph 6; *see also* pp. 20-21.

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

**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**  
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**Ann Moller Caen**  
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**Francesca Vietor**  
Vice President

**Anson Moran**  
Commissioner

**Sophie Maxwell**  
Commissioner

**Tim Paulson**  
Commissioner

**Harlan L. Kelly, Jr.**  
General Manager



including system power.”<sup>3</sup> The Commission also required CleanPowerSF to “[c]larify what percentage of disadvantaged communities in CleanPowerSF’s territory are not completely served by Hetch Hetchy Power.”<sup>4</sup> The Commission required CleanPowerSF to file this supplemental information via a Tier 2 advice letter.<sup>5</sup>

### **Compliance Items**

Attachment 1 to this Advice Letter is new Attachment E to CleanPowerSF’s 2018 IRP. It contains CleanPowerSF’s estimates of emissions of nitrogen oxides and particulate matter associated with all emitting resources used to serve load.

Attachment 2 to this Advice Letter is new Attachment F to CleanPowerSF’s 2018 IRP. It clarifies the Disadvantaged Communities served by CleanPowerSF.

### **Tier Designation**

Tier 2, as required by Ordering Paragraph No. 6 of D.19-04-040.

### **Effective Date**

No later than July 13, 2019 — 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 July 3, 2019, which is 20 days after the date of this filing. 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

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<sup>3</sup> D.19-04-040, p. 31.

<sup>4</sup> *Id.*

<sup>5</sup> D.19-04-040, p. 177, Ordering Paragraph 6; *see also* pp. 20-21.

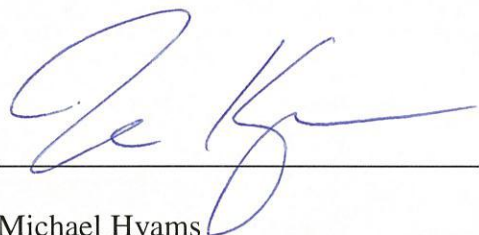
Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above. The protest shall also be sent to CleanPowerSF either via E-mail or U.S. mail at the address shown below on the same date it is mailed or delivered to the Commission:

Kiara Hermann  
CleanPowerSF  
San Francisco Public Utilities Commission  
525 Golden Gate Ave. 7th Floor  
San Francisco, CA 94102  
E-mail: khermann@sfgwater.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.<sup>6</sup>

**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.16-02-007.



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

cc: Service List R.16-02-007

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<sup>6</sup> See General Order 96-B, Section 3.11.

## **Attachment E: CleanPowerSF NOx and PM2.5 Emissions**

### **CleanPowerSF Air Pollutant Emissions**

CleanPowerSF does not plan on contracting directly with any power containing nitrogen oxide or particulate matter emissions; therefore CleanPowerSF's projected NOx and PM2.5 estimates are based on its procurement of system power. CleanPowerSF's preferred and conforming portfolio submitted in its 2018 CPUC filing assumes procurement of system power in the following amounts:

	<b>2018</b>	<b>2022</b>	<b>2026</b>	<b>2030</b>
CPSF Preferred Portfolio Estimate of System Power (GWh)	252	491	251	0

Using the most recent datasets available from CARB<sup>1</sup> and the CEC<sup>2</sup> to total electricity sector nitrous oxide emissions and NOx-emitting energy volumes, respectively, CleanPowerSF staff estimate a system power NOx emissions factor of 0.00108 tons/MWh. Using the most recent data from CARB<sup>3</sup> on particulate matter emissions and the CEC<sup>4</sup> to total electricity sector particulate matter emitting volumes, respectively, CleanPowerSF staff estimate a system power PM2.5 emissions factor of 0.000013 tons/MWh. Assuming conservatively that these emissions factors do not decrease, CleanPowerSF's resulting NOx and PM2.5 emissions projected estimates are below:

	<b>2018</b>	<b>2022</b>	<b>2026</b>	<b>2030</b>
CPSF Preferred Portfolio Estimate of System Power (GWh)	252	491	251	0
Projected Preferred Portfolio NOx emissions (metric tons)	272	530	271	0
Projected Preferred Portfolio PM2.5 emissions (metric tons)	2.91	5.66	2.89	0

<sup>1</sup> [https://www.arb.ca.gov/cc/inventory/data/tables/ghg\\_inventory\\_sector\\_sum\\_2000-16n2o.pdf](https://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_sector_sum_2000-16n2o.pdf).

<sup>2</sup> [https://www.energy.ca.gov/almanac/electricity\\_data/system\\_power/2016\\_total\\_system\\_power.html](https://www.energy.ca.gov/almanac/electricity_data/system_power/2016_total_system_power.html).

<sup>3</sup> [https://www.arb.ca.gov/app/emsv/2017/emssumcat\\_query.php?F\\_YR=2012&F\\_DIV=4&F\\_SEASON=A&SP=SIP105ADJ&F\\_AREA=CA%20-%20stationary](https://www.arb.ca.gov/app/emsv/2017/emssumcat_query.php?F_YR=2012&F_DIV=4&F_SEASON=A&SP=SIP105ADJ&F_AREA=CA%20-%20stationary).

<sup>4</sup> [https://www.energy.ca.gov/almanac/electricity\\_data/system\\_power/2016\\_total\\_system\\_power.html](https://www.energy.ca.gov/almanac/electricity_data/system_power/2016_total_system_power.html).

## **Attachment F: Disadvantaged Communities Served by CleanPowerSF**

**Clarification Regarding CleanPowerSF Territory and Served Disadvantaged Communities**

At the completion of enrollment, CleanPowerSF will serve customers in a territory that includes eleven census tracts identified as disadvantaged communities, based on their CalEnviroScreen 3.0 score percentile rank of 76%-100%. Note that while the City and County of San Francisco is home to twelve disadvantaged community census tracts, one of these, Treasure Island (Census Tract 6075017902), is not eligible for CleanPowerSF as it is served entirely by San Francisco’s publicly-owned utility through Hetch Hetchy Power.

Seven of the eleven disadvantaged communities to be served by CleanPowerSF are in the Hunters Point region of San Francisco, and four are around the Moscone Center/South of Market Street (SoMa)/Civic Center area. CalEnviroScreen 3.0 estimates these census tracts to have a population of 43,189. Over 99 percent of the accounts in these 11 tracts are either currently served by CleanPowerSF or are CleanPowerSF-eligible (and not served by Hetch Hetchy). A percent breakdown of Hetch Hetchy vs CleanPowerSF-eligible accounts is included below by tract for reference.

Map ID	Census Tract	% Accounts Eligible for CleanPowerSF
1	6075012301	100%
2	6075012502	100%
3	6075017601	99%
4	6075017801	99%
5	6075017902	n/a
6	6075023102	99%
7	6075023103	95%
8	6075023200	100%
9	6075023300	99%
10	6075023400	99%
11	6075061200	99%
12	6075980600	99%

