# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY LSE (Attach additional pages as needed)		
CleanPowerSF.		
Utility type:	Contact Person for questions and approval letters:	
	James Hendry	
☑ ELC □ GAS	Phone #: (415) 554-1526	
□ PLC □ HEAT □ WATER	E-mail: regcleanpowersf@sfwater.org	
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EXPLANATION OF UTILITY TYPE (Date Filed/ Received Stamp by CPUC)		
ELC = Electric GAS = Gas		
PLC = Pipeline HEAT = Heat	WATER = Water	
Advice Letter (AL) #: 1		
Subject of AL: GHG Emission Performance Standard (EPS) filing 2016		
Tier Designation: □ 1 ☑ 2 □ 3		
Keywords (choose from CPUC listing):		
AL filing type: □ Monthly □ Quarterly ☑ Annual □ One-Time □ Other		
If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution: D.07-01-039		
Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL1::N/A		
Resolution Required? □ Yes ☑ No		
Requested effective date: March 15, 2017 No. of tariff sheets:		
Estimated system annual revenue effect: (%):		
Estimated system average rate effect (%):		
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:		
Service affected and changes proposed <sup>1</sup> :		
Pending advice letters that revise the same tariff sheets:		
Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:		
CPUC, Energy Division	James H	
Attention: Tariff Unit	TO STATE OF THE PROPERTY OF TH	
505 Van Ness Ave., San Francisco, CA 94102	525 Golden Gate Ave., 7th Floor San Francisco, CA 94102	
EDTariffUnit@cpuc.ca.gov	regcleanpowersf@sfwater.org	

<sup>&</sup>lt;sup>1</sup> Discuss in AL if more space is needed.







February 15, 2017

CA Public Utilities Commission Energy Division Attention: Tariff Unit 505 Van Ness Avenue, 4<sup>th</sup> Floor San Francisco, CA 94102-3298

Re: GHG Environmental Performance Standard (EPS) Compliance Filing 2017

Pursuant to Ordering Paragraph No. 4 of Decision ("D.") 07-01-039, issued in R. 06-04-009 on January 25, 2007, CleanPowerSF submits this annual Attestation Letter affirming that the financial commitments CleanPowerSF has entered into for generation during 2016 are in compliance with the greenhouse gas ("GHG") emissions performance standard ("EPS").

The EPS was established with the passage of Senate Bill (SB)1368<sup>1</sup> and;

...Establishes a minimum performance requirement for any long-term financial commitment for baseload generation that will be supplying power to California ratepayers. The new law establishes that the GHG emissions rates for these facilities must be no higher than the GHG emissions rate of a combined-cycle gas turbine (CCGT) powerplant. An EPS is needed to reduce California's financial risk exposure to the compliance costs associated with future GHG emissions (state and federal) and associated future reliability problems in electricity supplies.<sup>2</sup>

In order to ensure that the requirements of SB1368 are met, the Commission requires Load Serving Entities (LSEs) to annually identify any generating resources or newly-entered into long-term contracts that could be subject to the EPS requirements.

#### Compliance Documentation

CleanPowerSF has not procured any electric generation that would qualify as "covered procurement" under the EPS requirements. In the last year, CleanPowerSF entered into two long-term contracts (of five years or longer, as defined under the EPS) with the following generating units.

Edwin M. Lee Mayor

Anson Moran President

Ike Kwon Vice President

Ann Moller Caen Commissioner

Francesca Vietor Commissioner

Vince Courtney Commissioner

Harlan L. Kelly, Jr. General Manager



<sup>1</sup> Stats. 2006, Ch. 598.

<sup>&</sup>lt;sup>2</sup> D.07-01-039, p. 2-3.

CleanPowerSF EPS Compliance Advice Letter 1

- A 10-year contract starting in December, 2016 for a portion of the output of the Sunset Reservoir Solar Photovoltaic Project.<sup>3</sup> This project:
  - o Is RPS-certified (CEC-RPS-ID #60793A);
  - Has zero-GHG emissions; and
  - Is not baseload generation as it has an annual capacity factor of 17%.<sup>4</sup>
- A 5-year contract (June 1, 2016 to May 31, 2021) for a 25 MW capacity share from the Shiloh I Wind Project. As a wind generating unit (CEC-RPS-ID- 60488A) this contract is compliant with the EPS.<sup>5</sup>

Effective Date: No later than March 15, 2017 – 30 days after filing.

Tier Designation: Tier 2 Designation.

#### **Protests**

This compliance filing is not subject to protest pursuant to General Order 96-B, Energy Industry Rule 9.

#### Correspondence

Any correspondence regarding this compliance filing should be sent by email to the attention of:

James Hendry
CleanPowerSF
San Francisco Public Utilities Commission
525 Golden Gate Ave. 7<sup>th</sup> Floor
San Francisco, CA 94102
(415) 554-1526
regcleanpowersf@sfwater.org

<sup>&</sup>lt;sup>3</sup> San Francisco Public Utilities Commission Resolution 16-0257 (December 13, 2016).

<sup>&</sup>lt;sup>4</sup> San Francisco Public Utilities Commission Power Source Disclosure Reports (2013-2015) submitted to the California Energy Commission.

<sup>&</sup>lt;sup>5</sup> "Based on the record in this proceeding, it is reasonable to make an upfront determination that the following renewable resources and technologies are EPS-compliant... Wind." (D.07-01-039, Conclusion of Law #35, p. 269. See also Finding of Fact #118, p. 246.)

### Certification

- (1) I have reviewed, or have caused to be reviewed, this compliance submittal.
- (2) Based on my knowledge, information, or belief, this compliance submittal does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements true.
- (3) Based on my knowledge, information, or belief, this compliance submittal contains all of the information required to be provided by Commission orders, rules, and regulations.

Michael Hyams

Director, CleanPowerSF

San Francisco Public Utilities Commission

525 Golden Gate Ave. 7th Floor

San Francisco, CA 94102

mhyams@sfwater.org

(415) 554-1590

#### **ATTACHMENTS**

RPS Eligibility Status of generating units under long-term SFPUC contract

cc: Service List R. 06-04-009

#### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



March 8, 2017

**Advice Letter 1-E** 

James Hendry CleanPowerSF San Francisco Public Utilities Commission 525 Golden Gate Ave. 7<sup>th</sup> Floor San Francisco, CA 94102

SUBJECT: GHG Emission Performance Standard (EPS) filing 2017

Dear Mr. Hendry:

Advice Letter 1-E is effective as of March 15, 2017.

Sincerely,

Edward Randolph

Director, Energy Division

Edward Rambofoth