



ADVICE LETTER SUMMARY



ENERGY UTILITY

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

Company name/CPUC Utility No.:

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Kiara Hermann
 Phone #: 415-554-1638
 E-mail: PowerRegulatory@sfwater.org
 E-mail Disposition Notice to:

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: CleanPowerSF AL 14-E

Tier Designation: 2

Subject of AL: GHG Environmental Performance Standard 2020 Compliance Filing

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

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:

Resolution required? Yes No

Requested effective date: 3/18/21

No. of tariff sheets: 0

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: N/A

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

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: Kiara Hermann
Title: Utility Analyst
Utility Name: CleanPowerSF
Address: 525 Golden Gate Ave
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Telephone (xxx) xxx-xxxx: 415-554-1638
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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	

February 16, 2021

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

Re: CleanPowerSF Advice Letter (AL) 14-E
GHG Environmental Performance Standard (EPS) Compliance Filing 2020

The City and County of San Francisco (“San Francisco or City”) hereby submits this advice letter on behalf of CleanPowerSF. CleanPowerSF is San Francisco’s Community Choice Aggregation program operated by the San Francisco Public Utilities Commission (“SFPUC”), an enterprise department of the City.

Pursuant to Ordering Paragraph No. 4 of Decision (“D.”) 07-01-039, issued in R. 06-04-009 on January 25, 2007, San Francisco submits this annual Attestation Letter affirming that the financial commitments San Francisco, through the SFPUC has entered into for CleanPowerSF generation during the prior calendar year are in compliance with the greenhouse gas (“GHG”) emissions performance standard (“EPS”). Specifically, CleanPowerSF is in compliance with the EPS. Documentation supporting that compliance is provided below.

Effective Date: March 18, 2021 – 30 days after filing

Tier Designation: Tier 2 Designation

Purpose

This Attestation Letter provides information and documentation required by D.07-01-039 for LSEs (electrical corporation, electric service provider, or community choice aggregator) with new long-term financial commitments (defined on Page 3 in Attachment 7 of D.07-01-039). This Attestation Letter demonstrates that for 2020 all financial commitments entered into by San Francisco are compliant with the EPS.

Background

D.07-01-039 requires all Load Serving Entities (“LSEs”) to file annual Attestation Letters, due February 15th of each year, attesting to the

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

Newsha Ajami
Commissioner

Michael Carlin
Acting
General Manager



Commission that the financial commitments entered into for generation during the prior calendar year are in compliance with the EPS. D.07-01-039 requires LSEs to file Attestation Letters as an advice letter and serve the Attestation Letter on the service list in Rulemaking ("R.") 06-04-009. This Attestation Letter is filed pursuant to that process.

D.07-01-039 requires LSEs to list long-term financial commitments of five years or longer that they have entered into during the prior year. Note that long-term financial commitments can be compliant if any of the following apply:

- 1) Not in a baseload powerplant;
- 2) Generation using pre-approved renewable resource technology;
- 3) Existing combined-cycle combustion turbine (in operation/or permitted to operate as of 6/30/07) with an increase in rated capacity less than 50 megawatts (MW);
- 4) Net emission rate of each baseload facility underlying a covered procurement does not exceed 1,100 lbs of CO₂ per megawatt hour (MWh);
- 5) Exemption related to: reliability exemption, extraordinary circumstances or financial harm, and CO₂ sequestration through injection in geological formations.

D.07-01-039 requires all LSEs to disclose the investment amount and type of alteration to retained generation, by generation facility and unit. D.07-01-039 also advises LSEs to present documentation regarding the design and intended use of the powerplant(s) underlying their new long-term financial commitments utilizing the sources of information listed in California Public Utilities Code § 8341(b)(4), as well as any other sources of documentation that they believe will be relevant to this determination.

D.07-01-039 emphasizes that the key concept is to establish the design and intended use of the powerplant. Accordingly, documentation of the annualized plant capacity factor for the powerplant should include historical annual averages in order to help determine whether the plant is "designed and intended" to be used for baseload generation. D.07-01-039 requires LSEs to provide documentation of capacity factors, heat rates and corresponding emissions rates that reflect the actual, expected operations of the plant.

This Attestation Letter comports with the requirements outlined above.

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:

Kiara Hermann
Utility Analyst, CleanPowerSF
PowerRegulatory@sfwater.org

Compliance Documentation

The following listings provide detailed and specific information regarding CleanPowerSF contracts and long-term financial commitments that are subject to the EPS requirements.

In 2020, the SFPUC entered into five long-term contracts (of five years or longer) to supply the CleanPowerSF program with the following generating units:

- A 25-year contract starting December 2023 for a 75 MW capacity share of the IP Aramis solar project. This facility:
 - Will be RPS-certified;
 - Has zero GHG emissions; and
 - Is not baseload generation.

- A 20-year contract starting November 2023 for a 20 MW capacity share of the Crow Creek solar project. This contract was amended and restated in 2020 to include 20 MW of 3-hour storage. This facility:
 - Will be RPS-certified;
 - Has zero GHG emissions; and
 - Is not baseload generation.

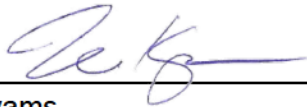
- A 20-year contract starting December 2021 for a 100 MW capacity share of the Maverick Solar 6 project. This contract was reported previously and was amended and restated in 2020 to include 50 MW of 4-hour storage. This facility:
 - Will be RPS-certified;
 - Has zero GHG emissions; and
 - Is not baseload generation.

- A 15-year contract starting November 2021 for a 60.3 MW capacity share of the Oasis Power Partners wind project. This facility:

- Is a pre-approved renewable resource technology;¹
 - Will be RPS-certified;
 - Has zero GHG emissions; and
 - Is not baseload generation.
- An amendment and 9-year extension to a contract for the following annual capacity shares of the Calpine Geysers Geothermal Plant. The original contract was executed in 2018 and was set to expire in 2022.
 - 2022: 25 MW
 - 2023-2029: 50 MW
- This project:
- Is RPS-certified (CEC RPS-ID 60113A); and
 - Is a pre-approved renewable resource technology.²

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

¹ This contract is compliant with the EPS. D.07-01-039, Finding of Fact #No 83, p.240 (“[s]mall power production facilities that use...wind...are pre-approved as compliant under this decision”); see also Conclusion of Law #No. 35, p.269 (“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”); Finding of Fact #No. 118, p.246.)

² This contract is compliant with the EPS. D.07-01-039, Finding of Fact #No. 83, p.240 (“[s]mall power production facilities that use...geothermal...are pre-approved as compliant under this decision”); see also Conclusion of Law #No. 35, p.269 (“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...Geothermal, with or without reinjection”); Finding of Fact #No. 118, p.246.)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **CleanPowerSF Advice Letter (AL) 14-E GHG Environmental Performance Standard (EPS) Compliance Filing 2020** via electronic mail to all parties on the attached email distribution list provided by the Commission for service on **R06-04-009**.

Executed on **February 16, 2021** in San Francisco, California.

/s/ Paula Fernandez

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