

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

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

CleanPowerSF

Utility type:

ELC       GAS  
 PLC       HEAT     WATER

Contact Person for questions and approval letters: Erin Mulberg

Phone #: (415) 551-4598

E-mail: [emulberg@sfwater.org](mailto:emulberg@sfwater.org)

### EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas  
PLC = Pipeline      HEAT = Heat      WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 3

Subject of AL: GHG Emission Performance Standard (EPS) filing 2019

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Does AL replace a withdrawn or rejected AL?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 \_\_\_\_\_

Summarize differences between the AL and the prior withdrawn or rejected AL<sup>1</sup>: \_\_\_\_\_

Resolution Required?  Yes  No

Requested effective date: March 15, 2019

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**  
**Attention: Tariff Unit**  
**505 Van Ness Ave.,**  
**San Francisco, CA 94102**  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

**Erin Mulberg**  
**San Francisco Public Utilities Commission**  
**525 Golden Gate Ave., 7<sup>th</sup> Floor**  
**San Francisco, CA 94102**  
[emulberg@sfwater.org](mailto:emulberg@sfwater.org)

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

February 1, 2019

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

Re: CleanPowerSF Advice Letter (AL) 3  
GHG Environmental Performance Standard (EPS) Compliance Filing 2018

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 2018 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.

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

<sup>2</sup> California Public Utilities Commission, D.07-01-039, p. 2-3.

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**  
Mayor

**Vince Courtney**  
President

**Ann Moller Caen**  
Vice President

**Francesca Vietor**  
Commissioner

**Anson Moran**  
Commissioner

**Ike Kwon**  
Commissioner

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



### **Compliance Documentation**

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

- A 22-year contract starting July, 2019 for a 100 MW capacity share from the San Pablo Raceway Solar Project. This project:
  - Will be RPS-certified (CEC-RPS-ID to be established);
  - Has zero-GHG emissions; and
  - Is not baseload generation.
- A 15-year contract starting December, 2020 for a 42 MW capacity share from the Voyager IV Wind Expansion Project. As a wind generating unit (CEC-RPS-ID to be established) this contract is compliant with the EPS<sup>3</sup>.

**Effective Date:** No later than March 15, 2019 – 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:

Erin Mulberg  
CleanPowerSF  
San Francisco Public Utilities Commission  
525 Golden Gate Ave. 7<sup>th</sup> Floor  
San Francisco, CA 94102  
(415) 551-4598  
[emulberg@sfgwater.org](mailto:emulberg@sfgwater.org)

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<sup>3</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.



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Michael Hyams  
Director, CleanPowerSF  
San Francisco Public Utilities Commission  
525 Golden Gate Ave. 7<sup>th</sup> Floor  
San Francisco, CA 94102  
[mhyams@sfwater.org](mailto:mhyams@sfwater.org)  
(415) 554-1590

cc: Service List R. 06-04-009