



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:

Phone #:
E-mail:
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) #:

Tier Designation:

Subject of AL:

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Does AL replace a withdrawn or rejected AL?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:

Summarize differences between the AL and the prior withdrawn or rejected AL: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

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 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:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

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	

October 31, 2019

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 5-E
Approval of CleanPowerSF's Local Resource Adequacy Waiver
Request for 2020 Year Ahead Filing (PUBLIC VERSION)**

Purpose

CleanPowerSF submits this advice letter seeking California Public Utilities Commission (CPUC) approval of its Local Resource Adequacy (RA) waiver request as identified in Confidential Appendix A for Calendar Years 2020-2022 in its 2020 RA Year Ahead filing requirements.

Background

In D.06-06-064 as amended by D.07-06-029, D.19-02-022 and most recently by D.19-06-026 the CPUC established a Local RA waiver process applicable to the Local RA compliance filings of LSEs. Section 24 of the "2020 Filing Guide for System, Local and Flexible Resource Adequacy (RA) Compliance Filings" (RA guide) reviews the process an LSE requesting such a waiver must follow. It requires:

- (1) a demonstration that the LSE reasonably and in good faith solicited bids for its RAR [Resource Adequacy Requirement] capacity needs

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.

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Vice President

Anson Moran
Commissioner

Sophie Maxwell
Commissioner

Tim Paulson
Commissioner

Harlan L. Kelly, Jr.
General Manager



- 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 produce 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

Compliance Efforts

1. RA Solicitations Since 2019 RA Year Ahead Filing

CleanPowerSF has reasonably and in good faith solicited bids for its Local Resource Adequacy Requirement (RAR) capacity needs. CleanPowerSF received no bids for each deficiency identified in confidential Appendix A.² Confidential Appendix A identifies the specific months of years 2020-2022 and the specific capacity (in MW) in certain LCA(s) for which CleanPowerSF requests a waiver.

Since the 2019 RA compliance year filing (October 31, 2018), CleanPowerSF has conducted five solicitations for unbundled RA capacity, taking all commercially reasonable steps to procure Local RA capacity. In accordance with reasonable procurement practices and D.19-02-022, these solicitations were for multi-year procurements.³ CleanPowerSF has also participated as a bidder in multiple solicitations from two investor-owned utilities for unbundled RA capacity, including Local RA, in an attempt to meet its entire Local RAR.⁴

¹ See RA Guide at 41 (quoting).

² See Declaration of Michael A. Hyams In Support of Confidential Treatment of Data and Information Contained in CleanPowerSF's 2020 Year-Ahead Resource Adequacy Compliance Filing.

³ See Appendix B for specific solicitation information

⁴ See Appendix C for specific bid participation information

2. Bundled Contracts

In addition to the unbundled RA capacity contracts discussed above CleanPowerSF has entered into multiple long term bundled (energy and capacity) contracts with parties and is continuing to pursue additional bundled contracts.⁵

3. Continued participation in the market

CleanPowerSF made all reasonable and good faith efforts to meet its RAR in advance of the year-ahead filing requirement. Notwithstanding this waiver request, CleanPowerSF will continue to seek Local RA capacity to cure the deficiencies identified in Appendix A.

Request

For the above reasons and accompanying Appendices CleanPowerSF requests that the Energy Division approves this Local RA Waiver request, through a decision that:

- Approves CleanPowerSF's requested waiver of the amount of Local RA capacity by deficient area and month as referenced in Confidential Appendix A.
- Clarifies that approval of the requested waiver means the waiver will apply in an ongoing manner to Month Ahead filings, provided CleanPowerSF submits an attestation indicating that CleanPowerSF has continued to attempt to cure any deficiencies but has been unable to procure its allocated Local RA capacity. The attestation would be signed by an appropriate Officer of CleanPowerSF in each Month Ahead filing for which it is requesting a waiver in the 2020 Year Ahead.

Tier Designation

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

Effective Date

No later than Nov. 30, 2019 — 30 days after filing.

⁵ See Appendix D for specific information on executed bundled contracts

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or email, no later than Nov. 19, 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

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:

Ben Gustafson
CleanPowerSF
San Francisco Public Utilities Commission
525 Golden Gate Ave. 7th Floor
San Francisco, CA 94102
E-mail: bgustafson@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.⁶

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.17-09-020.



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.17-09-020

⁶ See General Order 96-B, Section 3.11.

CONFIDENTIAL

APPENDIX A

CleanPowerSF Local Capacity Area Resource Adequacy
Waiver Request

[Confidential Chart omitted]

APPENDIX B

CleanPowerSF Unbundled RA Solicitations

CleanPowerSF Solicitation of Unbundled RA

CleanPowerSF has taken all commercially reasonable steps to procure Local Resource Adequacy through issuing five (5) solicitations for unbundled Resource Adequacy capacity.

1. Request for Offers (RFO) for System, Bay Area, Humboldt, Sierra, Stockton, Fresno, Kern, North Coast/North Bay, and Flex Resource Adequacy (RA) for 2020-2022
 - a. RFO Issuance date: April 29, 2019
 - b. Bid due date: May 8, 2019
 - c. Shortlist notification date: May 10, 2019
 - d. # of parties RFO was distributed to: ~320 emails
 - e. Solicitation Materials: <https://sfpuc.sharefile.com/d-s827b6b060024286b>
2. RFO for System, Bay Area, Humboldt, Sierra, Stockton, Fresno, Kern, North Coast/North Bay, and Flex RA for 2020-2022
 - a. RFO Issuance date: August 2, 2019
 - b. Bid due date: August 6, 2019
 - c. Shortlist notification date: August 9, 2019
 - d. # of parties RFO was distributed to: ~489 emails
 - e. Solicitation Materials: <https://sfpuc.sharefile.com/d-s14bd35e35024f219>
3. RFO for System, Bay Area, Humboldt, Sierra, Stockton, Fresno, Kern, North Coast/North Bay, and Flex RA for 2020-2022
 - a. RFO Issuance date: August 28, 2019
 - b. Bid due date: September 6, 2019
 - c. Shortlist notification date: September 11, 2019
 - d. # of parties RFO was distributed to: ~489 emails
 - e. Solicitation Materials: <https://sfpuc.sharefile.com/d-s2b67bcc493d4e44b>
4. RFO for System, Bay Area, Humboldt, Sierra, Stockton, Fresno, Kern, North Coast/North Bay, and Flex RA 2020-2022
 - a. RFO Issuance date: September 25, 2019
 - b. Bid due date: September 27, 2019
 - c. Shortlist notification date: October 4, 2019
 - d. # of parties RFO was distributed to: ~489 emails
 - e. Solicitation Materials: <https://sfpuc.sharefile.com/d-s8e12d7f31c34227a>
5. RFO for System, Bay Area, Humboldt, Sierra, Stockton, Fresno, Kern, North Coast/North Bay, and Flex RA 2020-2022
 - a. RFO Issuance date: October 16, 2019
 - b. Bid due date: October 18, 2019
 - c. Shortlist notification date: NA
 - d. # of parties RFO was distributed to: ~489 emails
 - e. Solicitation Materials: <https://sfpuc.sharefile.com/d-s6802dbc0b3944bb9>

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 Blasing 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 C

CleanPowerSF Participation in Other Entities'
Unbundled RA Solicitations

CleanPowerSF Participation in Other Entities

Unbundled RA Solicitations

CleanPowerSF participated in multiple solicitations from two investor-owned utilities as outlined below.

1. 2020-2023 SCE RA e-solicitation

- f. RFO Issuance date: May 8, 2019
- g. Bid Submission date: May 13, 2019
- h. Shortlist notification date: May 17, 2019
- i. Contract award/execution date: May 24, 2019
- j. Solicitation materials: <https://sfpuc.sharefile.com/d-s837cb3611ad4ceba>

2. 2020-2024 SCE RA e-Solicitation—Phase 1

- k. RFO Issuance date: July 25, 2019
- l. Bid Submission date: August 8, 2019
- m. Shortlist notification date: August 19, 2019
- n. Contract award/execution date: September 19, 2019
- o. Solicitation materials: <https://sfpuc.sharefile.com/d-s6817741760048648>

3. PG&E 2019 Multi-Year RA Sale Solicitation—Phase 1

- p. RFO Issuance date: July 26, 2019
- q. Bid Submission Date: August 6, 2019
- r. Shortlist notification date: August 26, 2019
- s. Contract award/execution date: September 19, 2019
- t. Solicitation materials: https://www.pge.com/en_US/for-our-business-partners/energy-supply/electric-rfo/wholesale-electric-power-procurement/ra-solicitation.page?WT.mc_id=Vanity_rfo-ra-solicitation&ctx=large-business

4. PG&E 2019 Multi-Year RA Sale Solicitation—Phase 2

- u. RFO Issuance date: September 18, 2019
- v. Bid Submission date: October 3, 2019
- w. Shortlist notification date: October 15, 2019
- x. Contract award/execution date: October 18, 2019
- y. Solicitation materials: https://www.pge.com/en_US/for-our-business-partners/energy-supply/electric-rfo/wholesale-electric-power-procurement/ra-solicitation.page?WT.mc_id=Vanity_rfo-ra-solicitation&ctx=large-business

5. 2020-2024 SCE RA e-Solicitation—Phase 2

- z. RFO Issuance date: September 23, 2019
- aa. Bid submission date: September 25, 2019
- bb. Shortlist notification date: October 1, 2019
- cc. Contract award/execution date: October 25, 2019

dd. Solicitation materials: <https://sfpuc.sharefile.com/d-s6a68ef22df844e5a>

APPENDIX D

CleanPowerSF Currently Executed Bundled Contracts

Bundled Contract: Avangrid - Shiloh

Counterparty	Avangrid
Location	Bay Area
Fuel Type	Wind
Flex/Generic	Generic
Resource ID	BRDSLD_2_SHILO1
MCC Bucket	4
Contract ID	CS-1032.B_Shiloh
Capacity	25 MW
Capacity Start/End Date	6.1.2016 05.31.2021

Bundled Contract: sPower – San Pablo Raceway

Counterparty	sPower
Location	South System/Big Creek
Fuel Type	Solar
Flex/Generic	Generic
Resource ID	BGSKYN_2_ASPSR2
MCC Bucket	4
Contract ID	PRO.0077.A_San Pablo Raceway
Capacity	100 MW
Capacity Start/End Date	7.30.2019 7.29.2041

Bundled Contract: NextEra – Blythe IV Solar

Counterparty	NextEra
Location	South System
Fuel Type	Solar
Flex/Generic	Generic
Resource ID	TBD
MCC Bucket	4
Contract ID	PRO.0077.C_Blythe IV
Capacity	62.5 MW
Capacity Start/End Date	9.30.2020 9.29.2040

Bundled Contract: Terra-Gen – Voyager IV Expansion

Counterparty	Terra-Gen
Location	South System
Fuel Type	Wind
Flex/Generic	Generic
Resource ID	TBD
MCC Bucket	4
Contract ID	PRO.0077.B_Voyager IV
Capacity	47 MW
Capacity Start/End Date	1.1.2021 12.31.2036