

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

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

Peninsula Clean Energy Authority

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person for questions and approval letters:

Janis Pepper, CEO

Phone #: (650) 260-0005

E-mail: jpepper@peninsulacleanenergy.com

EXPLANATION OF UTILITY TYPE

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

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: PCE-003-E

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Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL¹: _____

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 proposed¹:

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**

Utility Info (including e-mail)

**Peninsula Clean Energy Authority
2075 Woodside Road
Redwood City, CA 94061
compliance@peninsulacleanenergy.com**

¹ Discuss in AL if more space is needed.



San Mateo County | Atherton | Belmont | Brisbane | Burlingame | Colma | Daly City | East Palo Alto | Foster City
Half Moon Bay | Hillsborough | Millbrae | Menlo Park | Pacifica | Portola Valley | Redwood City | San Bruno | San Carlos
San Mateo | South San Francisco | Woodside

February 15, 2019

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Re: Peninsula Clean Energy Advice Letter No. PCE-003-E, Greenhouse Gas Emission
Performance Standard Compliance Filing.

Dear Energy Division Tariff Unit:

Enclosed please find Peninsula Clean Energy's Greenhouse Gas Emission Performance Standard
Compliance filing pursuant to Commission Decision 07-01-039. Please direct any questions to
me at (650) 260-0100 or by email at jpepper@peninsulacleanenergy.com.

Best Regards,

Janis Pepper
Chief Executive Officer
Peninsula Clean Energy

www.PeninsulaCleanEnergy.com

Enclosures

Attachment 2

Compliance Filing for LSEs with Long-Term Financial Commitments

February 15, 2019

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

Re: 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, Peninsula Clean Energy Authority submits this annual Attestation Letter affirming that the financial commitments Peninsula Clean Energy Authority has entered into for generation during the prior calendar year are in compliance with the greenhouse gas (“GHG”) emissions performance standard (“EPS”). Specifically, Peninsula Clean Energy Authority is in compliance with the EPS. Documentation supporting that compliance is provided below.

Effective Date: March 15, 2019

Tier Designation: Tier 2 Designation

Purpose

This Attestation Letter provides information and documentation required by D.07-01-039 for Load Serving Entities (electrical corporations, electric service providers, and community choice aggregators) with new long-term financial commitments (defined on Page 3 in Attachment 7 of D.07-01-039) entered into in calendar year 2018. This Attestation Letter demonstrates that for calendar year **2018** all financial commitments entered into by Peninsula Clean Energy Authority 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 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:

Siobhan Doherty
Director of Power Resources
Peninsula Clean Energy
2075 Woodside Road
Redwood City, CA 94061
(650) 817-7076
sdoherty@peninsulacleanenergy.com

Compliance Documentation

The following listings and/or tables provide detailed and specific information regarding Peninsula Clean Energy Authority contracts and long-term financial commitments that are subject to the EPS requirements. The compliance documentation must match the compliance category outlined previously. For example, the information provided must demonstrate that the net emissions rate of each baseload facility underlying a covered procurement is no higher than 1,100 lbs of carbon dioxide (CO₂) per megawatt hour (MWh).

1. Include a complete and detailed listing of the new long-term financial commitments of five years or longer they have entered into during the prior year with documentation to demonstrate:
 - a) Documentation demonstrating that such procurements are EPS compliant, including any contracts with a term of five years or longer that include provisions for substitute energy purchases.
 - b) For any requested reliability-based exemptions that have been pre-approved by the Commission, reference to the application and Commission decision number.
2. The complete listing of new long-term financial commitments of five years or longer must include “linked” contracts whose combined term is five years or longer.
3. Disclosure of LSE investments in retained generation, including “deemed-compliant” combined cycle gas turbines (CCGTs). All LSEs are to disclose the investment amount and a breakdown of alterations or refurbishments to retained generation, by generation facility and unit.
4. Present documentation regarding the designed and intended use of the powerplant(s) underlying their new long-term financial commitments utilizing the sources of information listed in § 8341 (b)(4), as well as any other sources of documentation relevant to the determination.
5. Provide documentation of capacity factors (for definition of capacity factor see Section 5.6 of D.07-01-039.), heat rates and corresponding emissions rates that reflect the actual, expected operation of the plant (not full load heat rate). Documentation of the annualized plant capacity factor for the power plant should include historical annual averages in order to determine whether the plant is “designed and intended” to be used for baseload generation at an annualized plant capacity factor of at least 60 percent.

As detailed in the following table, PCE entered into four long-term financial commitments for generation resources during calendar year 2018. Each of these commitments is detailed in the following table. All four commitments are fully EPS compliant, as all four commitments are for non-baseload resources. In addition, all four commitments are for low or zero GHG emitting hydroelectric resources, and as such fall well below the GHG threshold established in D.07-01-039 and CA Public Utilities Code§ 8341 (b)(4).

Table – EPS Compliant Contracts

Contract	Execution Date	Renewable Resource	Compliance Category	Term Length	EPS Compliant?
Bidwell Ditch	1/26/2018	Small Hydro	Not Baseload	17 years	Yes
Roaring Creek	1/26/2018	Small Hydro	Not Baseload	17 years	Yes
Clover Creek	1/26/2018	Small Hydro	Not Baseload	15 years	Yes
Hatchet Creek	1/26/2018	Small Hydro	Not Baseload	20 years	Yes

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.

Include the name and contact information for the LSE officer(s) certifying the above:

Dated: February 15, 2019

Jan Pepper
Chief Executive Officer
Peninsula Clean Energy
2075 Woodside Road
Redwood City, CA 94061
(650) 260-0100
jpepper@peninsulacleanenergy.com