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San Mateo | South San Francisco | Woodside

February 15, 2017

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

Re: Peninsula Clean Energy Authority Advice Letter No. PCEA-001-CCA, Greenhouse Gas
Emission Performance Standard Compliance Filing.

Dear Energy Division Tariff Unit:

Enclosed please find Peninsula Clean Energy Authority's Greenhouse Gas Emission Performance
Standard Compliance filing pursuant to Commission Decision 07-01-039. Please direct any questions to
me at (415) 309-9206 or by email at jpepper@peninsulacleanenergy.com.

Sincerely,

Janis Pepper
Chief Executive Officer
Peninsula Clean Energy Authority

Enclosures

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

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

Company name/CPUC Utility No. Peninsula Clean Energy Authority

Utility type:

ELC GAS

PLC HEAT WATER

Contact Person for questions and approval letters: Janis Pepper

Phone #: (415) 309-9206

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) #: PCEA-001-CCA

Subject of AL: GHG Emission Performance Standard (EPS) filing 2017

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Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL¹: _____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, 2017

No. of tariff sheets: 0

Estimated system annual revenue effect (%): n/a

Estimated system average rate effect (%): n/a

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: Retail electric service; no changes proposed

Pending advice letters that revise the same tariff sheets: none

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)
Janis Pepper, CEO
Peninsula Clean Energy Authority
455 County Center, 4th Floor
Redwood City, CA 94063
jpepper@peninsulacleanenergy.com

¹ Discuss in AL if more space is needed.

Attachment 2

Compliance Filing for LSEs with Long-Term Financial Commitments

February 15, 2017

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 2017

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, 2017

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 **2016** 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 include a listing of 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 § 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:

Janis Pepper
Chief Executive Officer
Peninsula Clean Energy Authority
455 County Center, 4th Floor
Redwood City, CA 94063
Email: jpepper@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.

Table 1 summarizes the long-term financial commitment that Peninsula Clean Energy Authority entered into during the prior year. This long-term financial commitment is EPS compliant because it includes pre-approved renewable resource technologies (i.e., wind) and PCC 1-eligible resources that have been verified as zero-carbon emission resources using Environmental Protection Agency eGRID data (i.e., hydroelectric).

Table 1 – EPS Compliant Contracts

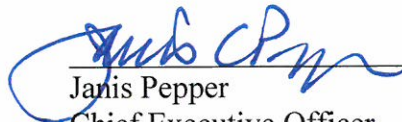
Line	Contract	Execution Date	Technology	EPS Compliant	Compliance Category
1	Energy America, LLC	12/13/2016	Wind, Hydroelectric (PCC 1)	Yes	Pre-Approved, Zero Emissions

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, 2017



 Janis Pepper
 Chief Executive Officer
 Peninsula Clean Energy Authority
 455 County Center, 4th Floor
 Redwood City, CA 94063
 Email: jpepper@peninsulacleanenergy.com