



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: **San Diego Community Power ("SDCP") (U-234-E)**

Utility type:

☒ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: **Erin Hudak**

Phone #: **(714)580-8113**

E-mail: **erin@tosdalapc.com**

E-mail Disposition Notice to: **erin@tosdalapc.com**

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

October 31, 2022

Advice Letter (AL) #: **11-E**

Tier Designation: **2**

Subject of AL: **San Diego Community Power Request for Local Resource Adequacy Waiver**

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Does AL replace a withdrawn or rejected AL?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: **N/A**

Summarize differences between the AL and the prior withdrawn or rejected AL: **N/A**

Confidential treatment requested? ☒ Yes ☐ No

If yes, specification of confidential information: **Attachment A**

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: **11/30/22**

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: **Service R. 21-10-002**

Pending advice letters that revise the same tariff sheets: **N/A**

¹Discuss in AL if more space is needed.

Protests and correspondence regarding this AL are to be sent via email and are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Ty Tosdal
Title: Regulatory Counsel
Utility/Entity Name: San Diego Community Power

Telephone (xxx) xxx-xxxx: (858) 952-4016
Facsimile (xxx) xxx-xxxx:
Email: ty@tosdalapc.com

Contact Name: Byron Vosburg
Title: Managing Director of Power Services
Utility/Entity Name: San Diego Community Power

Telephone (xxx) xxx-xxxx: (619) 880-6545
Facsimile (xxx) xxx-xxxx:
Email: bvosburg@sdcommunitypower.org

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

Clear Form

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
Curtailable 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, 2022

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

SDCP Advice Letter 11-E

**SUBJECT: [PUBLIC] REQUEST OF SAN DIEGO COMMUNITY POWER FOR WAIVER OF 2023
LOCAL PROCUREMENT OBLIGATIONS**

PURPOSE

Pursuant to California Public Utilities Commission (“Commission”) Decision (“D.”) 06-06-064 and D. 07-06-029, as modified by D. 19-02-022 and in accordance with Section 25 of the Commission’s *2023 Filing Guide for System, Local, and Flexible Resource Adequacy (RA) Compliance Filings* (“2023 Filing Guide”), San Diego Community Power (“SDCP”) hereby submits this Tier 2 Advice Letter seeking a waiver of penalties associated with a portion of its 2023 Local RA Requirements. SDCP’s specific Local RA requirements are market-sensitive and confidential, and they are provided in confidential Attachment A to this Advice Letter. This request is being submitted in conjunction with SDCP’s Local RA year ahead compliance filing.

For the reasons set forth below, SDCP respectfully requests a waiver of any potential penalties associated with its 2023 Local RA allocation. Thus far, SDCP has successfully procured 80% of its total Local RA allocation and expects to exceed 90% of its Local RA obligation upon completion of outstanding negotiations, which, due to regulatory uncertainty and procedural delays on behalf of the investor-owned utilities (IOUs) with whom SDCP is contracting, are expected to be completed and submitted via revised year-ahead filings in the coming days. SDCP took reasonable and good faith efforts to secure capacity in satisfaction of its Local RA requirements, and yet has been unable to secure contracts that would satisfy the remaining obligation. Based on the state of the market and the lack of available resources, SDCP believes that no further efforts would have resulted in the necessary procurement before the October 31, 2022, Year Ahead filing deadline.

BACKGROUND

SDCP was formed when five founding member cities – the City of San Diego, the City of Encinitas, the City of La Mesa, the City of Chula Vista, and the City of Imperial Beach – formed a Joint Powers

Authority, effective October 1, 2019.¹ SDCP submitted an Implementation Plan and Statement of Intent to the Commission on December 23, 2019. Reducing greenhouse gas (“GHG”) emissions was the driving factor in the formation of SDCP and originates from the Climate Action Plans (“CAP”) of its member cities. The City of San Diego, for example, adopted a CAP in 2015, and an updated CAP in 2022, that sets a goal for 100% renewable energy city-wide by 2035, and other member cities have adopted similar goals in their respective CAPs.² The member cities intend to achieve these goals in collaboration by jointly operating SDCP and providing renewable and GHG-free emissions free energy to residents, businesses, and government agencies.

SDCP began serving customer load to its five founding member cities in 2021. In March 2021, SDCP enrolled the municipal accounts of its five founding members and some large commercial accounts, and in July 2021, SDCP enrolled the remaining commercial, industrial, agriculture, street lighting, and traffic control accounts.³ Subsequently, between February and May 2022, SDCP enrolled residential and lighting accounts. As of early September 2022, SDCP had enrolled over 700,000 customer accounts. In addition, the County of San Diego and National City have decided to join SDCP, with enrollments scheduled for the first half of 2023.

In D. 19-02-022, the Commission adopted a three year forward Year Ahead Local RA requirement beginning in the 2020 RA compliance year.⁴ Subsequently, in D. 22-06-050, the Commission adopted the 2023-2025 Local capacity obligations, which include the 25,449 megawatt (“MW”) Local Capacity Requirement (“LCR”) for 2023 outlined in the California System Operator’s

¹ See *Joint Powers Agreement*, San Diego Regional Community Choice Energy Authority, October 1, 2019, available at https://www.sandiego.gov/sites/default/files/sdrceea_ipa_agreement_signed_0.pdf.

² See *Climate Action Plan*, City of San Diego, December 2015, at 35, available at https://www.sandiego.gov/sites/default/files/final_july_2016_cap.pdf and *2022 Climate Action Plan*, City of San Diego, at 16, available at https://www.sandiego.gov/sites/default/files/san_diegos_2022_climate_action_plan_0.pdf; See also, City of Encinitas, January 2018, at 3-2, available at https://encinitasca.gov/Portals/0/City%20Documents/Documents/City%20Manager/Climate%20Action/Encinitas_Climate%20Action%20Plan_Final_01-17-18.pdf?ver=2018-01-24-114612-100; City of La Mesa, March 13, 2018, at 45, available at https://www.cityoflamesa.us/DocumentCenter/View/11008/LMCAP_CC03132018?bidId=; City of Chula Vista, September 2017, at 20, available at <https://www.chulavistaca.gov/home/showdocument?id=15586>; City of Imperial Beach, July 17, 2019, at 31, available at https://www.imperialbeachca.gov/vertical/Sites/%7B6283CA4C-E2BD-4DFA-A7F7-8D4ECD543E0F%7D/uploads/Approved_CAP_071719_MF_1234_Climate_Action_Plan_Reso_2019-8054.pdf.

³ See *Letter to Energy Division Regarding Revisions to San Diego Community Power’s Implementation Plan*, July 21, 2021, available at: https://sdcommunitypower.org/wp-content/uploads/2021/11/2021.07.21_Letter-to-CPUC-Regarding-Revisions-to-Implementation-Plan.pdf.

⁴ D. 19-02-022, *Decision Refining the Resource Adequacy Program*, R. 17-09-020, February 21, 2019, at OP 2.

(“CAISO’s”) Final 2023 Local Capacity Technical Report.⁵ To date, SDCP has procured approximately 80% of its allocation. SDCP expects to exceed 90% of its Local RA obligation upon completion of outstanding negotiations, which, due to regulatory uncertainty and procedural delays on behalf of the investor-owned utilities (IOUs) with whom SDCP is contracting, are expected to be completed and submitted via revised year-ahead filings in the coming days. Despite its best efforts, SDCP has been unable to procure the remaining local capacity even after offering prices well above the local trigger price of \$51/kw-year.

LOCAL RA WAIVER STANDARD

D.06-06-064 and D.07-06-029 established a waiver process whereby an LSE can request relief from the procurement obligation with a demonstration that it has made every commercially reasonable effort to contract for Local RA resources.⁶ D.19-02-022 extended this waiver process to multiyear Local RA requirements.⁷ A waiver request must demonstrate that the LSE actively sought products and either received bids with prices in excess of their proposed administratively determined local attribute price or received no bids. Local RA waiver requests shall be submitted via a Tier 2 Advice Letter to the Commission with accompanying service to the service list (in redacted form, if necessary) of the RA proceeding open at the time of the request – R. 21-10-002.⁸ An LSE must establish the following:

- (1) a demonstration that the LSE reasonably and in good faith solicited bids for its RAR capacity needs 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 product of under \$73 per kW-year, or

⁵ D. 22-06-050, *Decision Adopting Local Capacity Obligations for 2023-20235, Flexible Capacity Obligations for 2023, and Reform Track Framework*, June 23, 2022, at OP 1; CAISO, *2023 Local Capacity Technical Study*, April 28, 2022, at 2, available at <http://www.caiso.com/InitiativeDocuments/Final2023LocalCapacityTechnicalReport.pdf> (“CAISO LCT”).

⁶ D. 06-06-064, *Opinion on Local Resource Adequacy Requirements*, R. 05-12-013, June 29, 2006, at Conclusion of Law 26; D. 07-06-029, *Opinion on Phase 2 – Track 1 Issues*, R. 05-12-013, June 21, 2007, at 37.

⁷ D. 19-02-022 at OP 2.

⁸ Commission *2023 Filing Guide for System, Local, and Flexible Resource Adequacy (RA) Compliance Filings*, R. 21-10-002, September 30, 2022, at 55 (“2023 Filing Guide”).

- (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.

These requirements are necessary, but are not necessarily a sufficient, condition for CPUC to grant waiver. The Commission will also consider other information brought to its attention regarding the reasonableness of the waiver request.⁹

DISCUSSION

SDCP's waiver request meets both prongs of the waiver requirements set forth in D. 06-06-064. Through 2021 and 2022, SDCP undertook an aggressive procurement strategy to overcome local contains and meet is local RA requirements. These efforts include: (1) conducting two separate RFO solicitations in 2021; (2) submitting bids in SDG&E's 2021 solicitation and attempting to engage bilaterally with SDG&E; (3) conducting two RFO solicitations in 2022; (4) submitting bids in SDG&E's 2022 solicitation; and (4) engaging bilaterally with SDG&E, PG&E, SCE, and non-IOU Local RA sellers.

1. SDCP Undertook Reasonable and Good Faith Efforts to Solicit Supply Bids for its Local RA Capacity Needs

As set forth in D. 06-06-064, an LSE seeking a waiver of penalties associated with Local RA deficiency must first demonstrate that it has "reasonably and in good faith solicited bids for its RAR capacity needs along with accompanying information about the terms and conditions of the Request for Offer or other form of solicitation."¹⁰ SDCP's request for a waiver thoroughly demonstrates that SDCP undertook reasonable, good faith solicitations with standard industry terms, participated in other LSE solicitations, and individually contacted every single local RA seller in the region. A more detailed description of SDCP's procurement efforts, as well as the terms and conditions of the solicitations, are included in confidential Attachment A.

SDCP began its efforts to procure local RA for 2023 in 2019. To overcome known market constraints, SDCP adopted a comprehensive procurement strategy to maximize its ability to obtain local RA. SDCP held its own request for offers ("RFO") for 2022-2024 SD-IV local RA in April 2021 and October 2021. In addition, SDCP submitted bids for SD-IV local RA in response to SDG&E's RFO. Outside of the RFO processes, SDCP persistently sought out bilateral negotiations to procure the necessary resources from other local RA sellers.

⁹ 2023 Filing Guide at 54-55.

¹⁰ D. 06-06-064 at 73.

Through these reasonable and good faith efforts, SDCP was able to secure 80% of its 2022 three-year local RA allocation before the 2022 year-ahead filing deadline. SDCP submitted Advice Letter 5-E requesting a waiver for its remaining Local procurement obligations.¹¹ On January 31, 2022, the Energy Division granted this request for waiver, finding that “SDCP’s waiver request demonstrated that it pursued all commercially reasonable efforts in procuring local capacity to meet its Local RA obligations in the deficient local areas.”¹²

SDCP continued its procurement efforts through 2022, issuing two RFOs for 2023-2025 Local RA in March 2022 and September 2022, and engaging with IOUs and other sellers to procure Local RA. SDCP was limited by SDG&E’s inability to negotiate bilaterally with SDCP and the lack of a formal process via which PCIA-eligible SD-IV Local Resources are allocated or offered to the LSEs which serve the customers on behalf of whom the incumbent IOU (in this case, SDG&E) procured said resources.. Further, PG&E and SCE were both limited by regulatory uncertainty, making it difficult to purchase or swap resources prior to the October 31 deadline. SDCP remained in negotiations to procure its remaining Local obligations up until the October 31 filing deadline, but was ultimately unable to do so despite pursuing all commercially reasonable options.

2. Despite Best Efforts SDCP Did not Receive Any Offers to Fulfill its Remaining Obligations or they were not under \$51 or unreasonable terms

The second prong of the RA Waiver standard set forth in D. 06-06-064, as modified by D.19-02-022, requires an LSE to demonstrate that “despite having actively pursued all commercially reasonable efforts to acquire the resources needed to meet the LSE’s local procurement obligations,” the LSE either received no bids, or received no bids under the trigger price for a waiver request.¹³ As delineated in Attachment A, SDCP conducted resource-by-resource outreach to each generating unit that qualifies for SD-IV Local RA, confirming that Local Capacity in 2023 and 2024 from each was i) already fully committed to other LSEs; ii) not available for sale prior to the October 31, 2022 filing deadline; or iii) available at a price that significantly exceeded \$51/kW-year.

3. Well-Documented Local Constraints and the Impacts of Regulatory Uncertainty on the Local Capacity Market Support Granting SDCP’s Waiver Request

¹¹ SDCP Advice Letter 5-E, *San Diego Community Power’s Local Resource Adequacy Waiver Request*, November 1, 2021.

¹² January 31, 2022, *Letter to SDCP Approving SDCP Advice Letter 5-E*.

¹³ D. 06-06-064 at 72-73; D. 19-02-022 at OP 13.

In D. 06-06-064, the Commission acknowledged that it “will consider other information brought to its attention regarding the reasonableness of the waiver request.”¹⁴ As described below, and detailed in Attachment A, SDCP’s procurement efforts were significantly limited by external factors that made it more difficult, if not impossible, for SDCP to secure otherwise available SD-IV resources.

Beyond the well-known supply shortfalls facing all load serving entities with SD-IV local RA obligations, the San Diego area is unique in terms of the proportion of overall system RA requirements that must be met with SD-IV local RA resources, as well as the significant role played by resources secured under the Cost Allocation Mechanism (“CAM”). The proportionate magnitude of the local RA obligation in the SDG&E area imposes unique and meaningful challenges when attempting to procure requisite local RA quantities, particularly for a new entity like SDCP.

SDCP highlights these factors to emphasize its belief that no further commercially reasonable efforts would have resulted in the necessary procurement before the October 31, 2022, year ahead filing deadline. Additional detail regarding the unique constraints contributing to SDCP’s deficiency is provided in confidential Attachment A.

CONCLUSION

For the reasons explained above, SDCP requests that the Energy Division recommend to the Commission that SDCP be granted a waiver of penalties associated with the portion of its Local RA obligation that it has thus far been unable to fulfill despite having actively pursued all commercially reasonable efforts.

REQUEST FOR CONFIDENTIAL TREATMENT

SDCP requests confidential treatment for the Memorandum from Byron Vosburg Regarding San Diego Community Power’s Local Resource Adequacy Waiver (the “Memorandum”) and all associated attachments thereto, which are included with this Advice Letter as confidential Attachment A. SDCP makes this request pursuant to D. 06-06-066, as modified by D. 07-05-032 and D. 08-04-023, which adopted the ESP matrix specifying categories of market-sensitive information that should be treated as confidential and D. 20-07-005, which provided that the market-sensitive information of CCAs shall be eligible for confidential treatment consistent with the ESP matrix.¹⁵

¹⁴ D. 06-06-064 at 73; see also 2021 Filing Guide at 43 (“Staff will consider a waiver request along with any other pertinent information in making recommendations to the Commission regarding whether to institute formal enforcement proceedings against a deficient LSE.”).

¹⁵ D. 20-07-005, *Decision Granting in Part Petition to Modify Decision 06-06-066*, R. 05-06-040, July 16, 2020 at 1.

As detailed in the Declaration of Stephen Gunther Supporting Confidentiality Claim for SDCP's Local RA Waiver Request Submission, included as Attachment C, the Memorandum and its attachments include various kinds of market-sensitive information regarding the current market positions and compliance obligations of SDCP, included, without limitation, procurement obligation quantities, procured quantities, entities with whom SDCP has negotiated and transacted, and price-related information that are all market sensitive information. Accordingly, SDCP requests that the Memorandum contained in Attachment A to this Local RA Waiver Request be treated as confidential. To the extent that the Commission has any different interpretation with respect to this request, SDCP respectfully requests that notice be provided to SDCP and that SDCP have an opportunity to provide any supplemental information necessary to maintain the confidentiality of the Memorandum.

EFFECTIVE DATE

In accordance with D. 19-06-026, SDCP submits this Advice Letter classified as Tier 2 (effective after staff approval) under GO 96-B.¹⁶ SDCP respectfully requests approval no later than November 30, 2022 which is 30 days from the date of this filing.

PROTEST

Anyone may protest this Advice Letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received by November 21, 2022 which is 21 days from the date this Advice Letter was filed with the Commission. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

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

Copies of the protest should also be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. A copy of the protest should also be sent via email to the address shown below on the same date it is delivered to the Commission.

ATTN: Byron Vosburg
Managing Director Power Services
San Diego Community Power

¹⁶ D. 19-06-026, *Decision Adopting Local Capacity Obligations for 2020-2022, Adopting Flexible Capacity Obligations for 2020, and Refining the Resource Adequacy Program*, R. 17-09-202, June 27, 2019 at OP 8.

815 E Street, Suite 12716
San Diego, CA 92112
Email: bvosburg@sdcommunitypower.org

Ty Tosdal
Tosdal, APC
845 15th Street, Suite 103
San Diego, CA 92101
Email: ty@tosdalapc.com

NOTICE

A copy of this Advice Letter has been distributed to the service list of R. 21-10-002 in accordance with D. 19-06-026.¹⁷

¹⁷ D. 19-06-026 at OP8. Local RA waiver requests shall be submitted via a Tier 2 Advice Letter to the Commission with accompanying service to the service list (in redacted form, if necessary) of the RA proceeding open at the time of the request.

ATTACHMENTS

Attachment A – Memorandum of Byron Vosburg Regarding San Diego Community Power’s Local Resource Adequacy Waiver

A-1 – PG&E solicitation

A-2 – SDCP 2021 RA solicitations

A-3 – SDCP 2022 RA solicitations

A-4 – SDG&E solicitations]

[ATTACHMENT A, A-1, A-2, A-3, & A-4 ARE CONFIDENTIAL – NOT PROVIDED WITH PUBLIC ADVICE LETTER]

Attachment B – Declaration of Stephen Gunther Supporting Confidentiality Claim for SDCP’s Local RA Waiver Request

Attachment C – Certificate of Service and Service List

CC: Service List R. 21-10-002

Ty Tosdal, Counsel, San Diego Community Power, Ty@tosdalapc.com



815 E Street, Suite 12716
San Diego, CA 92112
sdcommunitypower.org

ATTACHMENT A

MEMORANDUM OF BYRON VOSBURG REGARDING SAN DIEGO COMMUNITY POWER'S LOCAL RESOURCE ADEQUACY WAIVER

[CONFIDENTIAL]



815 E Street, Suite 12716
San Diego, CA 92112
sdcommunitypower.org

ATTACHMENT B

DECLARATION OF STEPHEN GUNTHER SUPPORTING CONFIDENTIALITY CLAIM FOR SDCP'S LOCAL RA WAIVER REQUEST SUBMISSION

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**DECLARATION OF STEPHEN GUNTHER
SUPPORTING CONFIDENTIALITY CLAIM FOR SDCP'S LOCAL RA WAIVER
REQUEST**

In accordance with General Order 66-D, D. 06-06-066, D. 08-04-023 setting forth the protocol for the submission of confidential information to the California Public Utilities Commission ("Commission"), and D. 20-07-005 extending confidential treatment to market-sensitive information of community choice aggregators ("CCA"), San Diego Community Power ("SDCP") submits the following declaration in support of its claim of confidentiality for the below-specified information provided in confidential Attachment A to SDCP Advice Letter 11-E: *San Diego Community Power Request for Local Resource Adequacy Waiver* ("SDCP AL 11-E").

The undersigned declares, under penalty of perjury pursuant to the laws of the State of California, as follows:

1. I am the Senior Regulatory Analyst for SDCP. In this capacity, I have knowledge of the information provided in this declaration and am authorized to make this declaration on SDCP's behalf.
2. In this Advice Letter submission, SDCP is securely and confidentially uploading the following documents to the Energy Division through the Commission's FTP system:
 - a. SDCP Advice Letter 11-E: *San Diego Community Power Request for Local Resource Adequacy Waiver*;
 - b. Confidential Attachment A: *Declaration of Byron Vosburg in Support of San Diego Community Power's Local Resource Adequacy Waiver Request*;
 - c. Attachment B: *Declaration of Stephen Gunther Supporting Confidentiality Claim for SDCP's Local RA Waiver Request*;
 - d. Attachment C: *Certificate of Service*.
3. In this Advice Letter submission, SDCP is publicly submitting the following documents to the Energy Division and the service list for the current Resource Adequacy Rulemaking, R. 19-11-009 via email:
 - a. SDCP Advice Letter 11-E: *San Diego Community Power Request for Local Resource Adequacy Waiver*;
 - b. Attachment B: *Declaration of Stephen Gunther Supporting Confidentiality Claim for SDCP's Local RA Waiver Request*;

c. Attachment C: *Certificate of Service*.

4. Through this declaration, SDCP requests that Attachment A to SDCP AL 11-E, along with supporting Attachments A-1, A-2, A-3, and A-4 contained therein, be treated as confidential and kept under seal.
5. This request for confidentiality is being made pursuant to the requirements and authority of D. 06-06-066, D.08-04-023, and D. 20-07-005; and Commission General Order 66-D.
6. The attached "Table of Confidential Information" identifies the specific information that is subject to this confidentiality request, provides specific citations to the authority upon which each request is based, provides a justification for confidential treatment, and specifies the length of time that the information is to be kept confidential.
7. SDCP is complying with the limitations of confidentiality specified in the ESP and CCA Matrix established in D. 06-06-066, as modified by D. 20-07-005 for the types of data being submitted subject to a request for confidentiality.
8. To the best of my knowledge, the information being submitted subject to this request for confidentiality is not already public.
9. SDCP is providing a public, unredacted version of SDCP AL 11-E and is separately providing confidential information in confidential Attachment A to the Commission. Redacted versions of this confidential attachment cannot reasonably be publicly produced.
10. As set forth below, the narrative and supporting documentation for SDCP AL 11-E is highly market-sensitive, confidential, and cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure. In particular, they include key elements of SDCP's procurement strategy, SDCP's bid prices, and third parties' bid prices in SDCP's solicitations, which may or may not have resulted in RA sale, and procurement transactions. These documents have been withheld from public distribution in their entirety.
11. The following person is designated as the person for the Commission to contact regarding potential release of this information by the Commission:

Ty Tosdal
Tosdal, APC
845 15th Street, Suite 103

San Diego, CA 92101
(858) 252-6416
ty@tosdalapc.com

Executed on October 31, 2022 at San Diego, California

/s/ Stephen Gunther

Stephen Gunther
Senior Regulatory Analyst
San Diego Community Power
815 E Street, Suite 12716
San Diego, CA 92112
(619) 657-0419
sgunther@sdcommunitypower.org

<p style="text-align: center;">TABLE OF CONFIDENTIAL INFORMATION SDCP Advice Letter 11-E: <i>San Diego Community Power's Request for Year-Ahead Local Resource Adequacy Waiver</i></p>			
Redaction Reference	Confidentiality Category from D.06-06-066 Matrix or Other Authority	Justification for Confidential Treatment	Length of Time Data to Be Kept Confidential
Confidential Attachment A to SDCP Advice Letter 11-E (entire document and Supporting Documents included in Attachments A-1 – A-4 therein)	ESP and CCA Matrix (as modified by D. 20-07-005), Item II(B) – RA Supply Data.	<p>The <i>Memorandum of Byron Vosburg Regarding San Diego Community Power's Local Resource Adequacy Waiver</i> supplements SDCP's Advice Letter by providing market-sensitive RA supply information:</p> <ul style="list-style-type: none"> • Capacity under contract (MW). • Capacity deficiencies (MW). • Contract price information. • Identifying information for specific procurement time periods. • Confidential information regarding SDCP's RA procurement practices. 	Under Item II(B), RA Supply Data is confidential for the first 3 years of the forecast period.

		<p>All of this information is not publicly available and constitutes “Supply Data” under Item II(B), and as such is confidential.</p> <p>Attachment A also includes supporting documentation of SDCP’s efforts to procure its Local RA obligation, including confidential communications with brokers, and bids/offers submitted to SDCP. All of this information is RA “supply data” under Item II(B) and as such is confidential.</p> <p>Additionally, this information is highly market sensitive as it: reveals confidential communications, proposals, offers, and bids between market participant, reveals SDCP’s business practices, and could be used by other market participants to determine SDCP’s RA short position, creating market disruption.</p>	
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815 E Street, Suite 12716
San Diego, CA 92112
sdcommunitypower.org

ATTACHMENT C

CERTIFICATE OF SERVICE

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Oversee the
Resource Adequacy Program, Consider Program
Reforms and Refinements, and Establish Forward
Resource Adequacy Procurement Obligations.

R. 21-10-002

CERTIFICATE OF SERVICE

I, Kalia Mitchell-Silbaugh, hereby certify that I have on this date caused a copy of the **SDCP ADVICE LETTER 11E: PUBLIC REQUEST OF SAN DIEGO COMMUNITY POWER FOR WAIVER OF 2023 LOCAL PROCUREMENT OBLIGATIONS** to be served pursuant to Commission Rules of Practice and Procedure upon the official service list for **R.21-10-002**, obtained from the Commission's website and attached hereto, by electronic mail, to all persons with a valid email address on the official service list.

Executed October 31, 2022 at San Diego, California.

/s/ Kalia Mitchell-Silbaugh

Kalia Mitchell-Silbaugh
Tosdal APC
845 15th Street, Suite 103
San Diego, California 92101
(707)868-8304
kali@tosdalapc.com



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Public Utilities
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CALIFORNIA PUBLIC UTILITIES COMMISSION

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Parties

BRIAN THEAKER VP - REGULATORY MIDDLE RIVER POWER, LLC EMAIL ONLY EMAIL ONLY, CA 00000 FOR: MIDDLE RIVER POWER LLC (MRP)	JEANNE B. ARMSTRONG SR. COUNSEL - REGULATORY SOLAR ENERGY INDUSTRIES ASSOCIATION EMAIL ONLY SACRAMENTO, CA 00000 FOR: SOLAR ENERGY INDUSTRIES ASSOCIATION
PAUL NELSON CONSULTANT BARKOVICH & YAP, INC. EMAIL ONLY EMAIL ONLY, CA 00000 FOR: CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATE	JASON HOUCK MGR - POLICY / REGULATORY FORM ENERGY, INC. 30 DANE STREET SOMMERVILLE, MA 02143 FOR: FORM ENERGY, INC.
NOAH GARCIA PRINCIPAL ADVANCED ENERGY ECONOMY 1010 VERMONT AVE. NW, SUITE 1050 WASHINGTON, DC 20005 FOR: ADVANCED ENERGY ECONOMY	DIWAKAR TEWARI, PE VP - PLANNING LS POWER DEVELOPMENT, LLC 16150 MAIN CIRCLE DRIVE, STE. 310 CHESTERFIELD, MO 63017 FOR: LS POWER DEVELOPMENT, LLC
AMANDA FRAZIER SVP - REGULATORY VISTRA ENERGY CORP. 1005 CONGRESS AVENUE, SUITE 750 AUSTIN, TX 78701 FOR: VISTRA CORP.	C.C. SONG DIR - REGULATORY CLEAN POWER ALLIANCE OF SOUTHERN CA. 801 S. GRAND AVE., STE. 400 LOS ANGELES, CA 90017 FOR: CLEAN POWER ALLIANCE OF SOUTHERN CALIFORNIA
PAUL SHEPARD COO DIAMOND GENERATING LLC 633 WEST FIFTH STREET, STE. 2700 LOS ANGELES, CA 90071 FOR: DIAMOND GENERATING LLC	RAVI SANKARAN DIR - BUSINESS DEVELOPMENT SOUTHWESTERN POWER GROUP II, LLC 21818 S. WILMINGTON AVENUE, SUITE 414 LONG BEACH, CA 90810 FOR: SOUTHWESTERN POWER GROUP II, LLC
GREGORY KLATT ATTORNEY DOUGLASS & LIDDELL 411 E. HUNTINGTON DRIVE, NO. 107-356 ARCADIA, CA 91006 FOR: WESTERN POWER TRADING FORUM	REBECCA MEIERS-DEPASTINO SR. ATTORNEY SOUTHERN CALIFORNIA EDISON COMPANY 2244 WALNUT GROVE AVE., PO BOX 800 ROSEMEAD, CA 91770 FOR: SOUTHERN CALIFORNIA EDISON COMPANY
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RYAN M. F. BARON ATTORNEY BEST BEST & KRIEGER LLP 18101 VON KARMAN AVENUE, STE. 1000 IRVINE, CA 92612 FOR: ORANGE COUNTY POWER AUTHORITY	DOUG KARPA SR ANALYST - REGULATORY PENINSULA CLEAN ENERGY 2075 WOODSIDE ROAD REDWOOD CITY, CA 94061 FOR: PENINSULA CLEAN ENERGY
DAVID MACMILLAN PRESIDENT MEGAWATT STORAGE FARMS, INC. 756 GLENVIEW DRIVE, STE. 105 SAN BRUNO, CA 94066 FOR: MEGAWATT STORAGE FARMS, INC.	MARC MONBOUQUETTE MGR - REGULATORY ENEL X NORTH AMERICA, INC. 846 BRANSTEN ROAD SAN CARLOS, CA 94070 FOR: ENEL X NORTH AMERICA, INC.
MATT MILEY CALIF PUBLIC UTILITIES COMMISSION LEGAL DIVISION ROOM 5135 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3214 FOR: PUBLIC ADVOCATES OFFICE	WILLIAM ROSTOV DEPUTY CITY ATTORNEY CITY AND COUNTY OF SAN FRANCISCO CITY HALL 1 DR CARLTON B. GOODLET PL. RM 234 SAN FRANCISCO, CA 94102-4682 FOR: CITY AND COUNTY OF SAN FRANCISCO
MATTHEW FREEDMAN STAFF ATTORNEY THE UTILITY REFORM NETWORK 785 MARKET STREET, 14TH FL SAN FRANCISCO, CA 94103 FOR: THE UTILITY REFORM NETWORK (TURN)	MOHIT CHHABRA SR. SCIENTIST NATURAL RESOURCES DEFENSE COUNCIL 111 SUTTER STREET, 21ST FL. SAN FRANCISCO, CA 94104 FOR: NATURAL RESOURCES DEFENSE COUNCIL
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NORA SHERIFF ATTORNEY BUCHALTER, A PROFESSIONAL CORPORATION 55 SECOND STREET, SUITE 1700 SAN FRANCISCO, CA 94105 FOR: CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION (CLECA)	RACHEL MCMAHON SUNRUN, INC. 225 BUSH STREET, STE 1400 SAN FRANCISCO, CA 94105 FOR: SUNRUN, INC.
ANDREW HOFFMAN CHIEF DEVELOPMENT OFFICER LEAPFROG POWER, INC. 1700 MONTGOMERY STREET, SUITE 200 SAN FRANCISCO, CA 94111 FOR: LEAPFROG POWER, INC.	CHARLIE BUCK DIR - REGULATORY, WEST ORACLE 475 SANSOME STREET, 15TH FL. SAN FRANCISCO, CA 94111 FOR: DR COALITION: ORACLE
DANIELLE OSBORN MILLS SR. MGR - POLITICAL & REG AFFAIRS PATTERN ENERGY GROUP LP 1088 SANSOME STREET SAN FRANCISCO, CA 94111 FOR: PATTERN ENERGY GROUP LP (PATTERN ENERGY)	SETH D. HILTON ATTORNEY STOEL RIVES LLP THREE EMBARCADERO CENTER, STE. 1120 SAN FRANCISCO, CA 94111 FOR: SHELL ENERGY NORTH AMERICA (US), L.P. D/B/A SHELL ENERGY SOLUTIONS
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JENNIFER A. CHAMBERLIN EXE. DIR / MARKETING DEV.	CYNTHIA CLARK DIR - CLEAN POWER PROGRAM

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JOSH STOOPS ATTORNEY BRAUN BLAISING & WYNNE, P.C. 555 CAPITOL MALL, STE 570 SACRAMENTO, CA 95814 FOR: SILICON VALLEY CLEAN ENERGY AUTHORITY	JOSH STOOPS ATTORNEY BRAUN BLAISING SMITH WYNNE, P.C. 555 CAPITOL MALL, STE. 570 SACRAMENTO, CA 95814 FOR: SONOMA CLEAN POWER AUTHORITY
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OF CALIFORNIA

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[TOP OF PAGE](#)
[BACK TO INDEX OF SERVICE LISTS](#)