



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: San Diego Community Power

Utility type:

☒ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Byron Vosburg

Phone #: 619-657-0419

E-mail: bvosburg@sdcommunitypower.org

E-mail Disposition Notice to: bvosburg@sdcommunitypower.org

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

October 31, 2024

Advice Letter (AL) #: 26-E

Tier Designation: Tier 2

Subject of AL: San Diego Community Power Year Ahead

Local Resource Adequacy Waiver Request

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 #: D.19-06-026

Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: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: RA Load Forecast & Supply Information; Procurement Strategy

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: Byron Vosburg; bvosburg@sdcommunitypower.org

Resolution required? ☒ Yes ☐ No

Requested effective date: 11/30/2024

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: Byron Vosburg
Title: Chief Commercial Officer
Utility Name: San Diego Community Power
Address: PO Box 12176
City: San Diego
State: California Zip: 92112
Telephone (xxx) xxx-xxxx: 619-657-0419
Facsimile (xxx) xxx-xxxx:
Email: bvosburg@sdcommunitypower.org

Name: Erin Pennell
Title: Compliance Analyst
Utility Name: San Diego Community Power
Address: PO Box 12176
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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, 2024

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

SDCP Advice Letter 26-E

**SUBJECT: REQUEST OF SAN DIEGO COMMUNITY POWER FOR WAIVER OF 2025, 2026,
AND 2027 LOCAL PROCUREMENT OBLIGATIONS (PUBLIC VERSION)**

PURPOSE

Pursuant to California Public Utilities Commission (“Commission and in accordance with Section 25 of the Commission’s *2025 Filing Guide for System, Local, and Flexible Resource Adequacy (RA) Compliance Filings* (“2025 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 2025, 2026, and 2027 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 2025, 2026, and 2027 Local RA allocation. Thus far, SDCP has successfully procured 74% of its Local RA obligation for 2025-2027. SDCP took reasonable and good faith efforts to secure capacity in satisfaction of its Local RA requirements, but has not yet been able 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, 2024, 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

¹ See *Joint Powers Agreement*, San Diego Regional Community Choice Energy Authority, October 1, 2019, available at https://www.sandiego.gov/sites/default/files/sdrcea_jpa_agreement_signed_0.pdf.

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. In addition, the County of San Diego and National City joined SDCP and customer accounts in their jurisdiction enrolled in SDCP service beginning in April 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. 24-06-004, the Commission adopted the 2025-2027 Local capacity obligations, which include the 22,782 megawatt (“MW”) Local Capacity Requirement (“LCR”) for 2025, 23,093 MW capacity for 2026, and 23,547 MW capacity for 2027.⁵ To date, SDCP has procured approximately 85% of its allocation for 2025. 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

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.

⁵ D. 24-06-004, *Decision Adopting Local Capacity Obligations for 2025-2027, Flexible Capacity Obligations for 2025, and Program Refinements*, R. 23-10-011, June 20, 2024, at OP 1-3; The 2025 LCR is outlined in the CAISO 2025 Local Capacity Technical Study, *2025 Local Capacity Technical Study*, CAISO, available at: <https://stakeholdercenter.caiso.com/InitiativeDocuments/Final2025LocalCapacityTechnicalReport.pdf>.

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. 23-10-011.⁸ 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
 - (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

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 2025 Resource Adequacy and Slice of Day Guide, September 25, 2024, at 74 (“2025 RA Guide”).

⁹ 2025 Filing Guide at 74.

DISCUSSION

SDCP's waiver request meets both prongs of the waiver requirements set forth in D. 06-06-064. From 2021 through 2024, SDCP undertook an aggressive procurement strategy to overcome local constraints and meet its local RA requirements. These efforts include:

- (1) Conducting an RFO for long-term renewable energy resources, which SDCP prefers to be located in the SD-IV Local area in 2020;
- (2) Conducting two separate RFO solicitations in 2021;
- (3) Submitting bids in SDG&E's 2021 solicitation and attempting to engage bilaterally with SDG&E;
- (4) Establishing an evergreen Request for Information for Local Renewable Energy and Energy Storage resources ("Local RFI");
- (5) Conducting two RFO solicitations in 2022;
- (6) Submitting bids in SDG&E's 2022 solicitation;
- (7) Conducting a solicitation for new-build renewable energy and energy storage resources ("2022 Renewable RFO");
- (8) Conducting a solicitation for new-build, stand-alone energy storage facilities in 2023 ("2023 Energy Storage RFO")
- (9) Conducting four RFO solicitations in 2023 for short-term RA from existing resources;
- (10) Submitting bids in SDG&E's 2023 solicitation;
- (11) Conducting two 2025-2027 RA RFOs in 2024;
- (12) Conducting an RFO for local renewable energy projects in 2024 ("2024 Local RFO");
- (13) Posting a Rolling Local RFI on SDCP's website;
- (14) Submitting bids in SDG&E's 2025 RA RFO; and
- (15) Engaging bilaterally with SDG&E, PG&E, SCE, non-IOU Local RA sellers, active RA brokers, and other market participants.

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

¹⁰ D. 06-06-064 at 73.

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 in 2020. To overcome known market constraints, SDCP adopted a comprehensive procurement strategy to maximize its ability to obtain local RA. 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.

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: the lack of a formal process via which Power Charge Indifference Adjustment ("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; SDG&E's inability to negotiate bilaterally with SDCP; the inability of most market participants (including SDG&E) to transact RA products for 2025 and beyond while the methodology and compliance tools for "slice of day" RA counting rules remained in flux; and, by lack of timely resolution regarding SDCP's Petition for Modification ("PFM") regarding correction of the load forecast data which is used to determine accurately the volume of Modified Cost Allocation Mechanism ("MCAM") Local RA resources which it purchases from SDG&E. SDCP remained in negotiations to procure its remaining Local obligations up until the October 31, 2022 filing deadline, but was ultimately unable to do so despite pursuing all commercially reasonable options.

On October 31, 2022, SDCP submitted Advice Letter 11-E requesting a waiver for its remaining Local procurement obligations in 2023-2025.¹¹ The Commission approved AL 11-E on November 3, 2023, stating 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 San Diego local area."

SDCP continued its RA procurement efforts throughout 2023. Market conditions present in 2022 continued and worsened into 2023 as resource retirements, increased capacity obligations, and project delays throughout the Western Electricity Coordinating Council ("WECC") region exacerbated resource scarcity, while (i) there remained no opportunity to allocate RA attributes from PCIA-eligible resources from IOUs to CCAs whose customers pay the above-market costs of said resources, (ii) the CPUC had yet to act upon SDCP's PFM regarding correcting the load forecast incorporated in MCAM allocation transactions, and (iii) regulatory uncertainty lingered throughout the market as all market participants awaited and assessed final compliance methodologies associated with transition to "slice of day" RA accounting in

¹¹ SDCP Advice Letter 11-E, *Request of San Diego Community Power for Waiver of 2023 Local Procurement Obligations*, October 31, 2022.

2025. Despite market headwinds, SDCP continued dogged procurement efforts, which included: administration of four RFOs for Local RA to be delivered during 2024-2026; participation in SDG&E's sole RA RFO, which included Local RA to be delivered in 2024, but SDG&E was unwilling to contract for 2025 and beyond due to regulatory uncertainty; and bilateral outreach and negotiations with all three IOUs, and every other resource owner in the SD-IV local area. Via these efforts, SDCP secured 74% of its three-year Local RA obligations for 2024-2026 by the October 31, 2023 deadline. While SDCP had procured sufficient resources to meet its 2026 Local RA requirements, a shortfall remained in 2025 due largely to pandemic- and supply-chain related project delays, uncertainty regarding interconnection and deliverability processes, and a dearth of 2025 transactions and resource availability in the market while most market participants awaited clarity regarding implementation of "slice of day" RA accounting rules.

Accordingly, on October 31, 2023, SDCP submitted Advice Letter 15-E requesting a waiver of any potential penalties associated with its 2024 and 2025 local RA obligations.¹² On January 18, 2024, the Commission granted this waiver request, again stating 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 San Diego-Imperial Valley local area."

SDCP continued its efforts to procure 2025-2027 local RA throughout 2024 and up until the filing of this waiver request. SDCP successfully contracted with three developers for local RA as a result of bilateral negotiations. SDCP held its own request for offers ("RFO") for 2025-2027 RA in March 2024 and July 2024, and a Local RFO for SD-IV local projects in December 2023. On August 30, 2024, SDCP participated in SDG&E's 2025 RA RFO. In September 2024, SDCP reached out to bilaterally to suppliers known to control SD-IV local resources inquiring about any additional local volume for 2025-2027. Finally, in late October 2024, SDCP solicited offers for 2025-2027 Local RA; SDCP remains in negotiations with a handful of respondents for limited supply available during this period but contracting has yet to be completed as of the October 31 Year Ahead deadline.

2. Despite Best Efforts SDCP Did not Receive Any Offers to Fulfill its Remaining Obligations of Under \$51 Per kW-Year

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 B-6, SDCP conducted resource-by-resource outreach to each generating unit that qualifies for SD-IV Local RA, confirming that Local

¹² SDCP Advice Letter 15-E, *Request of San Diego Community Power for Waiver of 2024 and 2025 Local Procurement Obligations*, October 31, 2023.

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

Capacity in 2025-2027 from each was i) already fully committed to other LSEs; ii) not available for sale prior to the October 31, 2024 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

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. 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, 2024, 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

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.”).

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

As detailed in the Declaration of Erin Pennell 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, 2024 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, 2024 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

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.

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.



P.O. Box 12716
San Diego, CA 92112
sdcommunitypower.org

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
Chief Commercial Officer
San Diego Community Power
P.O. Box 12716
San Diego, CA 92112
Email: bvosburg@sdcommunitypower.org

NOTICE

A copy of this Advice Letter has been distributed to the service list of R. 23-10-011 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

[CONFIDENTIAL – NOT PROVIDED WITH PUBLIC ADVICE LETTER]

Attachment B – SDCP RFO Solicitations and Local RA Outreach

Attachment C – Declaration of Erin Pennell Supporting Confidentiality Claim for SDCP’s Local RA Waiver Request

Attachment D – Certificate of Service and Service List

CC: Service List R. 23-10-011



P.O. Box 12716
San Diego, CA 92112
sdcommunitypower.org

ATTACHMENT A

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



P.O. Box 12716
San Diego, CA 92112
sdcommunitypower.org

ATTACHMENT B-1

SDCP 2023 Local Distributed RFO

**San Diego Community Power
2023 Request for Offer (“RFO”) for
Local Distributed Renewable Energy and Energy Storage
(“Local Distributed RFO”)**

INTRODUCTION

San Diego Community Power (“SDCP”) is a Community Choice Aggregation program (“CCA”) that commenced service in March 2021. Its membership is comprised of the following municipalities: the cities of Chula Vista, Encinitas, Imperial Beach, La Mesa, National City and San Diego as well as the County of San Diego (the “Member Agencies”). SDCP is requesting offers for local renewable energy and/or energy storage projects sited within San Diego County and interconnected at distribution voltage. The projects will assist in meeting SDCP’s published goal of procuring 15% of customer demand by new, local, infill resources by 2035.

RFO OVERVIEW

Through this RFO, SDCP requests information regarding new and existing, wholesale, **distributed, renewable energy projects within San Diego County** that will deliver some combination of Portfolio Content Category 1 (“PCC1”) renewable energy that meets California Renewables Portfolio Standard (“RPS”) eligibility requirements and wholesale **energy storage projects that will provide San Diego-Imperial Valley (“SD-IV”) Local Resource Adequacy (“RA”) or at a minimum, energy only attributes that can be scheduled by SDCP, preferably with an eventual path to FCDS (Full Capacity Deliverability Status)**. Pricing for energy storage projects should clearly and appropriately reflect the price of energy only vs full toll.

Desired Products

Generation Projects

- CEC-certified Renewable Energy
- Preference (but not requirement) for solar resources to be paired with battery storage, either co-located or aggregated.

Energy Storage Projects

- Full toll
- Local RA Only
- Energy Only

By participating in this RFO, each respondent acknowledges that it has read, understands, and agrees to the terms and conditions set forth in these instructions. SDCP reserves the right to reject any offer that does not comply with the requirements identified herein. This RFO does not constitute an offer to buy or create an obligation for SDCP to enter into an agreement with any party, and SDCP shall not be bound by the terms of any response unless SDCP has entered into a duly authorized and fully executed agreement. SDCP may, in its sole discretion and without notice, modify, extend, suspend, or terminate this RFO without further obligation or liability to any respondent.

SCHEDULE

This RFO will be administered per the following schedule: SDCP reserves the right to change the schedule of these events at any time and for any reason.

| RFO Activity | Anticipated Date of Completion |
|---|--|
| RFO Issuance | October 25, 2023 |
| Deadline for Electronic Question Submittal | <i>November 17, 2023</i> |
| RFO Response Deadline | December 22, 2023, no later than 5:00 P.M. PDT |
| Follow-up with RFO respondents, as necessary | January 2 -9, 2024 |
| Supplier Notifications (Short-List Selection) | <i>February 9, 2024</i> |
| Contract Negotiations | <i>February 12 through April 5, 2024</i> |
| SDCP Board to Award Contract(s) | <i>April 2024</i> – to occur at duly noted SDCP Board Meeting(s) |
| Execution of Contract(s) | <i>May 2024</i> – to occur after SDCP’s Board approves the final contract(s) |

PROJECT ELIGIBILITY

Each respondent may provide information regarding one or more renewable energy, energy storage, or paired (a combination of renewable energy and energy storage) project(s) conforming to the following eligibility requirements.

Resource Location and Interconnection

Renewable Energy, Stand-alone Energy Storage (not providing RA) and Paired Facilities

Within San Diego County and interconnected at distribution voltage

Stand-alone Energy Storage Facilities (providing RA)

Electrically interconnected within the San Diego-Imperial Valley (“SD-IV”) Local Capacity Area as defined by the California Independent System Operator (“CAISO”) and eligible to provide SD-IV Local RA

Minimum Capacity per SiteRenewable Energy and Paired Facilities

Minimum generating capacity of one hundred (100) kilowatts (“kW”) alternating current (“AC”). While not required, it’s preferred that paired facilities have minimum storage capacity of at least two (2) megawatt-hours (MWh) AC.

Stand-alone Energy Storage Facilities

Minimum rate of discharge of two hundred fifty (250) kW AC. Minimum storage capacity of five hundred (500) kWh AC.

Initial Date of Delivery

No later than December 31, 2027.

Term of Agreement

No less than ten (10) years; no more than twenty (20) years

Energy and Capacity ProductsRenewable Energy and Paired Facilities

Responses should reflect the sale of bundled, PCC1 renewable energy; Green Attributes and Renewable Energy Credits; and Capacity Attributes, if applicable.

Stand-alone Energy Storage Facilities

Responses should reflect the sale of at least one of the following:

1. **Energy only;**
2. **RA only;**
3. **All energy and capacity products**, including RA and full output and dispatch of energy storage; and/or

Pricing

Respondents are encouraged to provide the following prices. All responses should reflect prices that are unchanged throughout the entire contract term and shall not be adjusted by periodic escalators or time of delivery factors. *Alternative pricing options may be proposed in addition to those below.*

Renewable Energy Facilities

A single, flat price (\$/MWh) for energy delivered to the **point of interconnection**. This energy price shall reflect payment for the energy commodity, all Green Attributes, Renewable Energy Credits, and Capacity Attributes (if applicable).

Paired Facilities

In addition to the prices above for renewable energy facilities, respondents are encouraged to provide a separate capacity price (\$/kW-mo) for the energy storage capacity.

Stand-alone Energy Storage Facilities

1. A single, flat price (\$/kW-mo) for Energy-only capacity.
2. A single, flat price (\$/kW-mo) for RA-only capacity.
3. A single, flat price (\$/kW-mo) for all energy and capacity output, including RA, ancillary services, and full dispatch of energy storage.

Development Progress

Respondents are encouraged to provide the following documentation regarding any facilities that are not yet commercially operational:

1. Evidence of site control;
2. Fully executed interconnection agreement, interconnection studies, evidence that respondent has submitted a generator interconnection application to the appropriate jurisdictional entity, or a narrative description of the planned interconnection application process and timeline;
3. Description of respondent's intended financing plan for each proposed project in sufficient detail for SDCP to effectively evaluate the viability of such arrangements. To the extent that a respondent anticipates a joint project ownership structure, this structure shall be clearly articulated along with applicable ownership percentages attributable to each partner.

Scheduling Coordinator

SDCP does not have a strong preference regarding the assignment of Scheduling Coordinator ("SC") responsibilities and will consider information regarding facilities in which the Buyer or Seller provides such services.

Renewable Resource Eligibility

All renewable energy and paired generating resources must be certified by the California Energy Commission ("CEC") as Eligible Renewable Energy Resources. Each respondent shall be responsible for certification of the proposed resource through the certification process administered by the CEC and shall be responsible for maintaining such certification throughout the contract term.

All Renewable Energy Certificates must be created by and transferred to SDCP via the Western Renewable Energy Generation Information System ("WREGIS"), or its successor, without any additional costs or conditions to SDCP. Each respondent shall be independently responsible for

registering its generating project(s) with WREGIS and for maintaining an active WREGIS account throughout the proposed term of agreement.

Sustainable Workforce

Consistent with its Inclusive and Sustainable Workforce Policy, SDCP encourages submission of information from respondents that use the following hiring practices. SDCP encourages respondents to describe efforts taken in pursuit of any of the following.

1. Employ workers and use businesses from San Diego and Imperial Counties;
2. Employ properly licensed contractors and California certified electricians;
3. Utilize local apprentices, particularly graduates of San Diego and Imperial County pre-apprenticeship programs;
4. Pay workers the prevailing wage rates for each craft, classification, and type of work performed;
5. Display a poster at jobsites informing workers of prevailing wage requirements;
6. Provide workers compensation coverage to on-site workers; and
7. Support and use of State of California approved apprenticeship programs.

Supplier Diversity

Public Utilities Code Section 366.2(m), as amended by Senate Bill 255, requires certain community choice aggregators, including SDCP, to annually submit to the California Public Utility Commission (“CPUC”): (1) a detailed and verifiable plan for increasing procurement from small, local, and diverse business enterprises; and (2) a report regarding its procurement from women, minority, disabled veteran, persons with disabilities, and LGBT business enterprises.

General Order (GO) 156, adopted by the CPUC, requires certain California public utilities to engage in outreach activities and meet specific procurement goals from women, minority, disabled veteran, persons with disabilities, and LGBT business enterprises. Qualified businesses become GO 156 certified through the CPUC and are then added to the GO 156 Supplier Clearinghouse database (www.thesupplierclearinghouse.com). Although SDCP is not subject to GO 156, SDCP supports the goals and principles of GO 156 and desires to obtain information relating to supplier diversity in order to assist SDCP in evaluating its outreach and other activities consistent with applicable law.

To assist SDCP with its reporting obligations under Public Utilities Code Section 366.2(m) and with evaluating its supplier outreach and other activities, proposers that are awarded the contract will be asked to voluntarily disclose their certification status with the CPUC Clearinghouse, as well as their efforts to work with diverse business enterprises, including WBEs, MBEs, DVBES, and LGBTBEs.

Except as otherwise expressly provided under this Policy and/or required by applicable state or federal law or funding requirements (including, without limitation, any grant or loan conditions), SDCP shall not use any demographic information received from potential vendors

in any way as part of its decision-making or selection process. Rather, SDCP will use such information solely for compliance with its reporting obligations to the CPUC and evaluation of SDCP's outreach and other activities consistent with applicable law. Pursuant to Article I, Section 31 of the California Constitution, SDCP shall not discriminate against or give preferential treatment to any individual or group on the basis of race, sex, color, ethnicity, or national origin except as otherwise allowed therein.

INSTRUCTIONS

Questions

Respondents may submit questions regarding this RFO via the question submission form available on SDCP's website specific to this RFO. All must be received by 9:00 a.m. (Pacific Time) on **November 17th, 2023**.

SDCP will post responses to questions by **December 1st, 2023**. SDCP reserves the right to group similar questions when providing answers.

SDCP may submit clarifying questions to certain respondents or conduct interviews, as necessary, based on information provided in the response template and/or supporting materials included with each response. SDCP shall have the right, at its sole discretion, to request information without notifying other respondents. SDCP shall establish due dates for responses at the time of each informational request and will directly notify individual respondents in the event that follow-up and/or interviews are necessary during this process.

Responses

Note: only electronic submittals will be accepted; such submittals must be received by SDCP no later than **5:00 P.M. PST on December 22, 2023**. All responses should be submitted via an online form available on SDCP's website specific to this RFO (<https://www.sdcommunitypower.org/resources/solicitations>). It is the sole responsibility of the submitting Proposer to ensure that its proposal is received before the submission deadline. Submitting Proposers shall bear all risks associated with delays in delivery. Any proposals received after the scheduled closing date and time for receipt of proposals may not be accepted.

All respondents must use the standardized response template available on SDCP's website (<https://sdcommunitypower.org/resources/solicitations/>). An unmodified version of the template must be completed in its entirety based on instructions provided in the template. SDCP may update the RFO and template from time to time, so respondents are encouraged to periodically visit the SDCP website to determine if any changes have been posted. Only submittals that comply with the current RFO and applicable template will be reviewed.

SDCP may submit clarifying questions to certain respondents or conduct interviews, as appropriate, based on information provided in the response template or supporting materials. SDCP shall have the right, at its sole discretion, to request information without notifying other respondents. SDCP shall establish due dates for responses at the time of each informational request and will directly notify individual respondents in the event that follow-up or interviews are appropriate during this process.

CONTRACTING

SDCP plans to negotiate a single form of Power Purchase Agreement (“PPA”), or Energy Storage Service Agreement (“ESSA”), or Resource Adequacy Agreement (“RA”) with each of the short-listed suppliers. As part of the short-list notification process, SDCP will provide each of the short-listed suppliers with a draft contract for review. Contract negotiations will proceed thereafter. The pro-forma term sheets have been posted along with this RFP announcement so that respondents can review prior to completing the response form.

CONFIDENTIALITY

All correspondence with SDCP, including responses to this RFO, will become the exclusive property of the SDCP and will become public record under the California Public Records Act (Cal. Government Code section 6250, et seq.). All documents sent by respondents to SDCP may be subject to disclosure, unless exempt under the California Public Records Act.

In order to designate information as confidential, the respondent must clearly stamp and identify any designated portion(s) of the response material with the word “Confidential” and provide a citation to the California Public Records Act supporting confidential treatment of such information. Respondents should be judicious in designating material as confidential. Over-designation would include stamping/designating entire pages, series of pages and/or entire sections as confidential when such material does not require confidential treatment.

Therefore, any proposal which contains language purporting to render all or significant portions of the proposal as “Confidential”, “Trade Secret” or “Proprietary”, or which fails to provide the noted exemption citation (related to the California Public Records Act) may be considered a public record in its entirety subject to the procedures described below. Do not mark your entire proposal as “Confidential”.

If required by any law, statute, ordinance, a court, governmental authority, or agency having jurisdiction over SDCP, including the California Public Records Act, SDCP may release confidential information, or a portion thereof, as required by applicable law, statute, ordinance, decision, order, or regulation. In the event SDCP is required to release confidential information, it shall notify the respondent of the required disclosure, such that the respondent may attempt (if it so chooses), at its sole cost, to cause the recipient of the confidential information to treat such information in a confidential manner, and to prevent such information from being disclosed or otherwise become part of the public domain.

SDCP does not intend to disclose any part of any response based on the understanding that there is a substantial public interest in not disclosing proposals during the evaluation process.



P.O. Box 12716
San Diego, CA 92112
sdcommunitypower.org

ATTACHMENT B-2

SDCP 2025-2027 RA RFO
March 5, 2024

Erin Pennell

From: Asikeh Kanu
Sent: Tuesday, March 5, 2024 1:50 PM
To: RARFO
Subject: CY 2025-2027 RA RFO
Attachments: SDCP RA RFO Response Template (2025-2027).xlsx; CY2025-2027 RA RFO COVER LETTER.docx

Good Afternoon,

San Diego Community Power ("SDCP") is seeking **to purchase** the following Resource Adequacy ("RA") products for the 2025-2027 compliance period:

| Product | Area | Minimum Volume (MW) | SDCP Buy/Sell | Delivery Start | Delivery End | Term |
|---------------------------------|---------------------------|---------------------|---------------|----------------|--------------|--|
| Local RA (Flexible or Generic) | SD-IV | 5 MW | SDCP Buys | 1/1/2025 | 12/31/2027 | Calendar Year, Quarterly, Partial Strip or Monthly |
| System RA (Flexible or Generic) | North and/or South System | 5 MW | SDCP Buys | 1/1/2024 | 12/31/2027 | Calendar Year, Quarterly, Partial Strip or Monthly |

Solicitation Timeline

| | |
|--------------------|-----------------------------|
| RFO Issued | March 5, 2024 |
| Offers Due | 5:00 PM PPT, March 8, 2024 |
| Shortlist Notified | 5:00 PM PPT, March 13, 2024 |

Solicitation Details

- The bid response template is attached to this email.
- Preference will be given to entities that are a WSPP member or have an existing EEI Master Agreement in place with SDCP.
- Offers are requested in \$/kW-month
- Responses and/or questions should be addressed to akanu@sdcommunitypower.org and RARFO@sdcommunitypower.org.
- Please submit offers by uploading the attached spreadsheet to the following link: [Submissions for CY 2025-2027 RA RFO](#)
- Attachments can be included in the form submission and/or submitted to akanu@sdcommunitypower.org and RARFO@sdcommunitypower.org
- **Responses must be submitted by 5:00 PM PPT on Friday, March 8, 2024. Offers will be evaluated on an ongoing basis and respondents are encouraged to submit offers early.**

At its sole discretion, SDCP reserves the right to define and modify evaluation criteria at any time, accept or reject any offers or portions of offers, and modify or terminate this solicitation at any time and for any reason.

Regards,

Asikeh Kanu

Portfolio Manager, Power Services

Office 619.732.1854 ext.130

akanu@sdcommunitypower.org

PO Box 12716

San Diego, CA 92112

sdcommunitypower.org

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ATTACHMENT B-3

SDCP 2025-2027 RA RFO
July 5, 2024

Erin Pennell

From: Asikeh Kanu
Sent: Friday, July 5, 2024 12:31 PM
To: RARFO
Subject: SDCP CY 2025-2027 RA RFO
Attachments: CY2025-2027 RA RFO COVER LETTER.docx; SDCP RA RFO Response Template (2025-2027).xlsx

Good Afternoon,

San Diego Community Power ("SDCP") is seeking **to purchase** the following Resource Adequacy ("RA") products for the 2025-2027 compliance period:

| Product | Area | Minimum Volume (MW) | SDCP Buy/Sell | Delivery Start | Delivery End | Term |
|---------------------------------|---|---------------------|---------------|----------------|--------------|--|
| Local RA (Flexible or Generic) | SD-IV | 5 MW | SDCP Buys | 1/1/2025 | 12/31/2027 | Calendar Year, Quarterly, Partial Strip or Monthly |
| System RA (Flexible or Generic) | North and/or South System | 5 MW | SDCP Buys | 1/1/2025 | 12/31/2027 | Calendar Year, Quarterly, Partial Strip or Monthly |
| Import RA | PV, COB, NOB, IID-SCE, IID-SDGE (others will be considered) | 2 MW | SDCP Buys | 1/1/2025 | 12/31/2027 | Calendar Year, Quarterly, Partial Strip or Monthly |
| Import Energy | PV, COB, NOB (others will be considered) | 5 MW | SDCP Buys | 1/1/2025 | 12/31/2027 | Calendar Year, Quarterly, Partial Strip or Monthly |

Solicitation Timeline

| | |
|--------------------|----------------------------|
| RFO Issued | July 5, 2024 |
| Offers Due | 5:00 PM PPT, July 15, 2024 |
| Shortlist Notified | 5:00 PM PPT, July 19, 2024 |

Solicitation Details

- The bid response template is attached to this email.
- Preference will be given to entities that are a WSPP member or have an existing EEI Master Agreement in place with SDCP.
- Offers are requested in \$/kW-month for system and local RA capacity and in \$/MWh for import products
- Responses and/or questions should be addressed to akanu@sdcommunitypower.org and RARFO@sdcommunitypower.org.

- Please submit offers by uploading the attached spreadsheet to the following link: [Submissions for CY 2025-2027 RA RFO](#)
- Attachments can be included in the form submission and/or submitted to akanu@sdcommunitypower.org and RARFO@sdcommunitypower.org
- **Responses must be submitted by 5:00 PM PPT on Monday, July 15, 2024. Offers will be evaluated on an ongoing basis and respondents are encouraged to submit offers early.**

At its sole discretion, SDCP reserves the right to define and modify evaluation criteria at any time, accept or reject any offers or portions of offers, and modify or terminate this solicitation at any time and for any reason.

Regards,

Asikeh Kanu

Portfolio Manager, Power Services

Office 619.732.1854 ext.130

akanu@sdcommunitypower.org

PO Box 12716

San Diego, CA 92112

sdcommunitypower.org

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ATTACHMENT B-4

**SDCP 2025-2027 Local RA RFO
October 21, 2024**

Erin Pennell

From: Asikeh Kanu
Sent: Monday, October 21, 2024 3:05 PM
To: RARFO
Subject: CY 2025-2027 SD-IV Local RA RFO
Attachments: CY2025-2027 SDIV RA RFO COVER LETTER.docx; SDCP RA RFO Response Template SDIV (2025-2027).xlsx

Follow Up Flag: Follow up
Flag Status: Flagged

Good Afternoon,

San Diego Community Power (“SDCP”) is seeking **to purchase** the following Resource Adequacy (“RA”) products for the 2025-2027 compliance period:

| Product | Area | Minimum Volume (MW) | SDCP Buy/Sell | Delivery Start | Delivery End | Term |
|--------------------------------|-------|---------------------|---------------|----------------|--------------|--|
| Local RA (Flexible or Generic) | SD-IV | 5 MW | SDCP Buys | 1/1/2025 | 12/31/2027 | Calendar Year, Quarterly, Partial Strip or Monthly |

Solicitation Timeline

| | |
|--------------------|-------------------------------|
| RFO Issued | October 21, 2024 |
| Offers Due | 5:00 PM PPT, October 24, 2024 |
| Shortlist Notified | 5:00 PM PPT, October 25, 2024 |

Solicitation Details

- The bid response template is attached to this email.
- Preference will be given to entities that are a WSPP member or have an existing EEI Master Agreement in place with SDCP.
- Offers are requested in \$/kW-month for local RA capacity
- Responses and/or questions should be addressed to Asikeh.K@sdcommunitypower.org and RARFO@sdcommunitypower.org.
- Please submit offers by uploading the attached spreadsheet to the following link: [Submissions for CY 2025-2027 RA RFO](#)
- Attachments can be included in the form submission and/or submitted to Asikeh.K@sdcommunitypower.org and RARFO@sdcommunitypower.org

- **Responses must be submitted by 5:00 PM PPT on Thursday, October 24, 2024. Offers will be evaluated on an ongoing basis and respondents are encouraged to submit offers early.**

At its sole discretion, SDCP reserves the right to define and modify evaluation criteria at any time, accept or reject any offers or portions of offers, and modify or terminate this solicitation at any time and for any reason.

Asikeh Kanu

Portfolio Manager, Power Services

Office 619.732.1854 ext.130

Asikeh.K@sdcommunitypower.org

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ATTACHMENT B-5

SDCP Response to SDG&E 2025 RA RFP

[CONFIDENTIAL]



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ATTACHMENT B-6

SDCP Local RA Outreach Efforts

[CONFIDENTIAL]



P.O. Box 12716
San Diego, CA 92112
sdcommunitypower.org

ATTACHMENT C

DECLARATION OF ERIN PENNELL SUPPORTING CONFIDENTIALITY CLAIM FOR SDCP'S LOCAL RA WAIVER REQUEST SUBMISSION

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

**DECLARATION OF ERIN PENNELL
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 26-E: *San Diego Community Power Request for Local Resource Adequacy Waiver* ("SDCP AL 26-E").

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

1. I am the Compliance 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 26-E: *Request of San Diego Community Power for Waiver of 2025, 2026, and 2027 Local Procurement Obligations.*
 - b. Attachment A: *Memorandum of Byron Vosburg Regarding San Diego Community Power's Year Ahead Local Resource Adequacy Waiver Request [Confidential]*
 - c. Attachment B: *SDCP RFO Solicitations and Local Outreach*
 - d. Attachment C: *Declaration of Erin Pennell Supporting Confidentiality Claim for San Diego Community Power's Year Ahead Local Resource Adequacy Waiver Request*
 - e. Attachment D: Certificate of Service and Service List
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.23-10-011 via email:

- a. SDCP Advice Letter 26-E: *Request of San Diego Community Power for Waiver of 2025, 2026, and 2027 Local Procurement Obligations.*
 - b. Attachment B: *SDCP RFO Solicitations*
 - c. Attachment C: *Declaration of Erin Pennell Supporting Confidentiality Claim for San Diego Community Power's Year Ahead Local Resource Adequacy Waiver Request*
 - d. Attachment D: Certificate of Service and Service List
4. Through this declaration, SDCP requests that Attachment A to SDCP AL 26-E, along with supporting Attachments B-5 and B-6, 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 26-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 26-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:

Byron Vosburg
Chief Commercial Officer
San Diego Community Power
P.O. Box 12716
San Diego, CA 92112
Email: bvosburg@sdcommunitypower.org

Executed on October 31, 2024 at San Diego, California

/s/ Erin Pennell

Erin Pennell
Compliance Analyst
San Diego Community Power
PO BOX 12716
San Diego, CA 92112
(619) 732-4677
epennell@sdcommunitypower.org

TABLE OF CONFIDENTIAL INFORMATION

SDCP Advice Letter 26-E:

San Diego Community Power's Request for Year-Ahead Local Resource Adequacy Waiver

| 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 26-E (entire document) and Supporting Documents Attachments B-5 & B-6) | 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. <p>All of this information is not publicly available and constitutes "Supply</p> | Under Item II(B), RA Supply Data is confidential for the first 3 years of the forecast period. |

| | | | |
|--|--|---|--|
| | | <p>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. The public interest in withholding this information outweighs the public interest in disclosing it.</p> | |
|--|--|---|--|



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ATTACHMENT D

CERTIFICATE OF SERVICE

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

CERTIFICATE OF SERVICE

Executed on October 31, 2024 in San Diego, California.

Erin Pennell

SAN DIEGO COMMUNITY POWER

PO Box 12716

San Diego, CA 92112

Telephone: (619) 732-4677

E-mail: epennell@sdcommunitypower.org



California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: R2310011 - OIR RESOURCE ADEQUAC

FILER: CPUC

LIST NAME: LIST

LAST CHANGED: OCTOBER 29, 2024

[Download the Comma-delimited File](#)
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Parties

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FOR: SOUTHERN CALIFORNIA EDISON COMPANY
(SCE)

ANDREA WHITE
STAFF ATTORNEY
THE PROTECT OUR COMMUNITIES FOUNDATION
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