AGENDA

Regular Meeting
Finance and Risk Management Committee

March 19, 2026, 4 p.m.

City of Chula Vista Council Chambers
276 Fourth Avenue, Chula Vista, CA

The meeting will be held in person at the above date, time, and location. Finance and Risk Management Committee (FRMC) members and members of the public can attend in person. Under certain circumstances, FRMC members may also attend and participate virtually in the meeting, pursuant to the Brown Act (Gov. Code § 54953). As a convenience, San Diego Community Power provides a Zoom teleconference option for members of the public to virtually observe and provide public comments at its meetings. Additional details on in-person and virtual public participation are below. Please note that in the event of a technical issue causing a disruption in the Zoom teleconference option, the meeting will continue unless otherwise required by law (such as when an FRMC member is virtually attending the meeting), pursuant to certain provisions of the Brown Act.

Note: Any member of the public may provide comments to the FRMC on any agenda item. When providing comments, it is requested that members of the public include their name and city of residence for the record. Members of the public are requested to address their comments to the FRMC as a whole through the chairperson. Comments may be provided in one of the following ways:

1. **Oral comments during the meeting.** Anyone attending in person who wishes to address the FRMC is asked to complete a speaker's card and present it to the clerk of the Board. To provide remote comments during the meeting, join the Zoom meeting by computer, mobile phone or dial-in number. When participating in a Zoom video teleconference by computer or mobile phone, use the "Raise Hand" feature. This will notify the moderator that a member of the public wishes to address the FRMC during a specific item on the agenda or during the non-agenda public comment period. Members of the public will not be shown on video but will be able to address the FRMC when called upon. If joining the meeting using the Zoom dial-in number, members of the public can raise their hand by pressing *9. Comments will be limited to three minutes.

2. **Written comments.** Written public comments must be submitted prior to the start of the meeting to ClerkOfTheBoard@SDCommunityPower.org. Members of the public are asked to indicate a specific agenda item when submitting comment. All written comments received prior to the meeting will be provided to the FRMC members. At the discretion of the chairperson, the first ten submitted comments shall be stated into the record of the meeting. Comments read at

the meeting will be limited to the first 400 words. Comments received after the start of the meeting will be collected, sent to the FRMC members, and become part of the public record.

If members of the public have any materials to be distributed to the FRMC, they should be sent to ClerkOfTheBoard@SDCommunityPower.org, who will distribute the information to FRMC members.

The public may participate using the following remote options:

Teleconference Meeting Webinar
https://sdcommunitypower-org.zoom.us/j/95148519712

Telephone (audio only): 669-900-6833 or 253-215-8782 | Webinar ID: 95148519712

WELCOME

CALL TO ORDER

ROLL CALL

PLEDGE OF ALLEGIANCE

LAND ACKNOWLEDGEMENT

ITEMS TO BE ADDED, WITHDRAWN OR REORDERED ON THE AGENDA

PUBLIC COMMENT FOR ITEMS NOT ON THE AGENDA

This is an opportunity for members of the public to address the FRMC on any items not on the agenda but within the jurisdiction of the FRMC. Members of the public may provide comments in any manner described above.

CONSENT CALENDAR

1. **Approve February 19, 2026, Meeting Minutes**

REGULAR AGENDA

2. **Treasurer's Report for Six-Month Period Ending December 31, 2025**

Recommendation: Receive and File Treasurer's Report for Six-Month Period Ending December 31, 2025.

3. **Recommend Board Adoption of Resolution, Approving the Rate Stabilization Reserve Policy**

Recommendation: Recommend Board Adoption of Resolution, Approving the Rate Stabilization Reserve Policy.

4. **Recommend Board Adoption of Resolution, Authorizing San Diego Community Power to Join the California Community Choice Financing Authority as a Founding Member**

Recommendation: Recommend Board adoption of Resolution, authorizing San Diego Community Power (Community Power) to participate as a founding member of the California Community Choice Financing Authority (CCCFA) and approving execution of the CCCFA Joint Powers Agreement.

5. **Update on 2026 Projected Community Power Rates**

Recommendation: Receive and File Update on 2026 Projected Community Power Rates.

6. **Announcement of Public Investment Grade Credit Rating from S&P Global Ratings**

Recommendation: Receive and file staff report acknowledging San Diego Community Power's publicly issued "A" Issuer Credit Rating with a Stable Outlook from S&P Global Ratings.

Committee Member Announcements

FRMC members may briefly provide information to other members and the public. There is to be no discussion or action taken on comments made by FRMC members unless authorized by law.

ADJOURNMENT

The Finance and Risk Management Committee will adjourn until the next regular meeting scheduled for Thursday, April 16, 2026, at 4 p.m.

Compliance with the Americans with Disabilities Act

Community Power committee meetings comply with the Americans with Disabilities Act. Individuals with a disability who require a modification or accommodation, including auxiliary aids or services, to participate in a public meeting may contact ClerkOfTheBoard@SDCommunityPower.org. Requests for disability-related modifications or accommodations require varying lead times and should be provided at least 72 hours in advance of the public meeting.

Availability of Committee Documents

Copies of the agenda and related materials are available at https://sdcommunitypower.org/resources/meeting-notes/. Late-arriving documents related to an agenda item are distributed to the committee members prior to or during the committee meeting and are available for public review as required by law. Public records, including agenda-related documents, can be requested electronically from ClerkOfTheBoard@SDCommunityPower.org. or by mailing San Diego Community Power, Attn: Clerk of the Board, P.O. Box 12716, San Diego, CA 92112. The documents may also be posted on Community Power's website. Such public records are also available for inspection by contacting ClerkOfTheBoard@SDCommunityPower.org to arrange an appointment.

SAN DIEGO COMMUNITY POWER

FINANCE AND RISK MANAGEMENT COMMITTEE
Regular Meeting Minutes
February 19, 2026

City of Chula Vista
276 Fourth Avenue, Chula Vista, CA 91910

WELCOME

CALL TO ORDER

Chair Yamane called the Finance and Risk Management Committee meeting to order at 4:01 p.m.

ROLL CALL

PRESENT: Chair Yamane, City of National City; Vice Chair Suzuki, City of La Mesa; and Director Inzunza, City of Chula Vista

Absent: None

Staff Present: Chief Executive Officer Burns (via Zoom Teleconference); Director of Finance Manglicmot; Senior Strategic Finance Manager Spengler (via Zoom Teleconference); Rates; General Counsel Tyagi; Clerk of the Board Hernandez; and Assistant Clerk of the Board Vences

PLEDGE OF ALLEGIANCE

Chair Yamane led the Pledge of Allegiance.

LAND ACKNOWLEDGEMENT

Chair Yamane acknowledged the Kumeyaay Nation and all the original stewards of the land.

ITEMS TO BE ADDED, WITHDRAWN, OR REORDERED ON THE AGENDA

There were no items added, withdrawn, or reordered on the agenda.

PUBLIC COMMENTS FOR ITEMS NOT ON THE AGENDA

Rob, Chula Vista Live Data representative, provided public comments.

CONSENT CALENDAR

1. Approve December 4, 2025, Meeting Minutes

2. Recommend Appointment of Jeb Spengler as San Diego Community Power's Interim Treasurer

There were no public comments on Consent Item Nos. 1-2.

Motioned by Director Inzunza and seconded by Vice Chair Suzuki to approve Consent Item Nos. 1-2. The motion carried 3/0 by Roll Call Vote as follows:

AYES:	Chair Yamane, Vice Chair Suzuki and Director Inzunza
NOES:	None
ABSTAINED:	None
ABSENT:	None

REGULAR AGENDA

3. Treasurer's Report for Period Ending November 30, 2025

Mr. Spengler presented the Treasurer's Report for Period Ending November 30, 2025.

There were no public comments on Item No. 3.

After Committee Member comments, the Treasurer's Report for Period Ending November 30, 2025, was received and filed.

4. Resolution, Authorizing Execution of an Energy Prepayment Transaction, Related Documents, and 'Form of' Documents Subject to Maximum Issuance Amount, Limitation on Fees, and Minimum Required Savings

Messrs. Spengler and Mike Berwanger (via Zoom Teleconference), representative from PFM, provided an overview of the Energy Prepayment Transaction.

There were no public comments on Item No. 4.

Motioned by Vice Chair Suzuki and seconded by Director Inzunza to recommend Board adoption of Resolution, approving parameters under which an energy prepayment transaction can be completed;

authorizing and approving documents or "form of" documents supporting the prepay transaction; and directing California Community Choice Financing Authority (CCCFA) to make payments to service providers for issuance costs from prepay bond proceeds. The motion carried 3/0 by Roll Call Vote as follows:

AYES:	Chair Yamane, Vice Chair Suzuki, and Director Inzunza
NOES:	None
ABSTAINED:	None
ABSENT:	None

5. Amendment of the FY 2025-26 Operating Budget, the FY 2025-26 Capital Budget, and the FY 2026-30 Capital Investment Plan

Messrs. Manglicmot and Do presented the proposed amendment of the FY 2025-26 Operating Budget, the FY 2025-26 Capital Budget, and the FY 2026-30 Capital Investment Plan.

There were no public comments on Item No. 5.

Motioned by Director Inzunza and seconded by Vice Chair Suzuki to recommend Board Approval of Amendment of the FY 2025-26 Operating Budget, the FY 2025-26 Capital Budget, and the FY 2026-30 Capital Investment Plan. The motion carried 3/0 by Roll Call Vote as follows:

AYES:	Chair Yamane, Vice Chair Suzuki, and Director Inzunza
NOES:	None
ABSTAINED:	None
ABSENT:	None

COMMITTEE MEMBER ANNOUNCEMENTS

None.

ADJOURNMENT

The Finance and Risk Management Committee adjourned at 4:39 p.m. to the next regular meeting scheduled for Thursday, March 19, 2026, at 4 pm.

_____

Sandra Vences
Assistant Clerk of the Board

SAN DIEGO COMMUNITY POWER

SAN DIEGO COMMUNITY POWER
Staff Report – Item 2

To:	Finance and Risk Management Committee
From:	Jeb Spengler, Senior Strategic Finance Manager
Via:	Karin Burns, Chief Executive Officer
Subject:	Treasurer's Report for Six-Month Period Ending December 31, 2025
Date:	March 19 ,2026

Recommendation

Receive and File Treasurer's Report for Six-Month Period Ending December 31, 2025.

Background

San Diego Community Power (Community Power) prepares its accounting records on a full accrual basis under GAAP for governmental enterprise funds. Year-to-date financial statements for the six-month period ending December 31, 2025, include budget comparisons.

The Board adopted an Investment Policy on May 25, 2023, with subsequent revisions on June 27, 2024, and August 28, 2025, to ensure the safeguarding of principal, preservation of liquidity, generation of returns, and adherence to a high standard of fiduciary care. The policy requires regular reporting to the Financial and Risk Management Committee (FRMC) via the Treasurer's Report. As of December 31, 2025, the investment portfolio was compliant with Community Power's Investment Policy.

To enhance transparency, Community Power reports newly executed contracts between $50,000 and $150,000 in the Treasurer's Report, per the Delegated Contract Authority Policy. Monthly operational metrics are presented at Board meetings, and key risk metrics are shared during FRMC meetings as part of the Treasurer's Report.

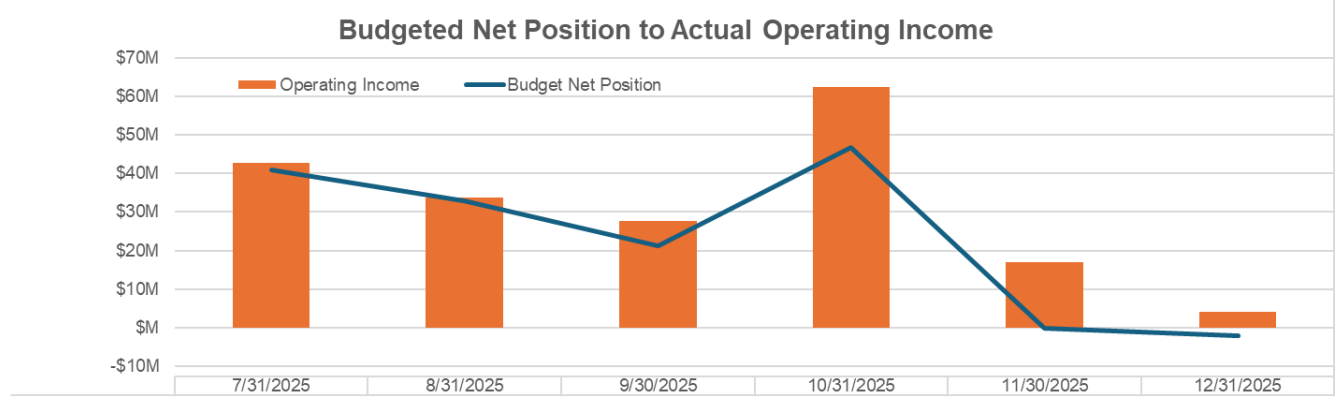
On February 26, 2026, Community Power's Board of Directors (Board) approved the Amended Fiscal Year 2025-26 Operating Budget, which serves as the basis for comparison in this report.

Analysis and Discussion:

Actual financial results for the period ending December 31, 2025: $762.9 million in net operating revenues were reported compared to $767.9 million budgeted for the period. Community Power's change in net position of $176.5 million was reported year-to-date for Fiscal Year 2025-26. The following is a summary of the actual results through December 31, 2025, compared to the Fiscal Year 2025-26 Amended Budget:

- Operating revenues are $5.0 million, or 0.65% under budget primarily due to cooler temperatures driving lower energy sales.
- Cost of energy is $49.9 million, or 8.0% under budget, primarily due to lower energy costs resulting from lower Net CAISO and REC costs.
- Professional Services and Consultants: $3.4 million below budget due to lower-than-expected utilization of outside professional services.
- Personnel Costs: $1.5 million under budget, driven by vacancies and accrued vacation.
- Non-Operating Revenues and Expenses:
    - Total investment income of $8.2 million. Investment income is not currently budgeted and is reflected in financial statements as realized.
    - $942.3 thousand in year-to-date interest and related expenses versus $946.0 thousand budgeted, in line with expectations.

The chart below shows the Budgeted Net Position as compared to actual operating income through the first six months of FY26:



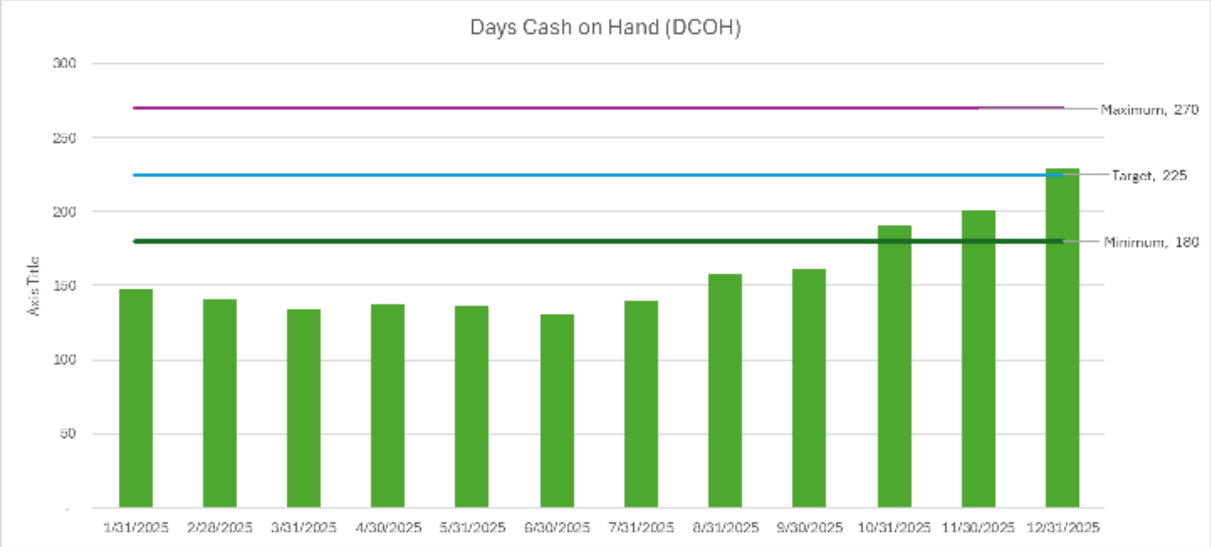
	7/31/2025	8/31/2025	9/30/2025	10/31/2025	11/30/2025	12/31/2025
Operating Income	$42.8M	$33.8M	$27.6M	$62.4M	$17.1M	$4.2M
Budget Net Position	$40.9M	$32.9M	$21.3M	$46.8M	-$0.1M	-$2.1M

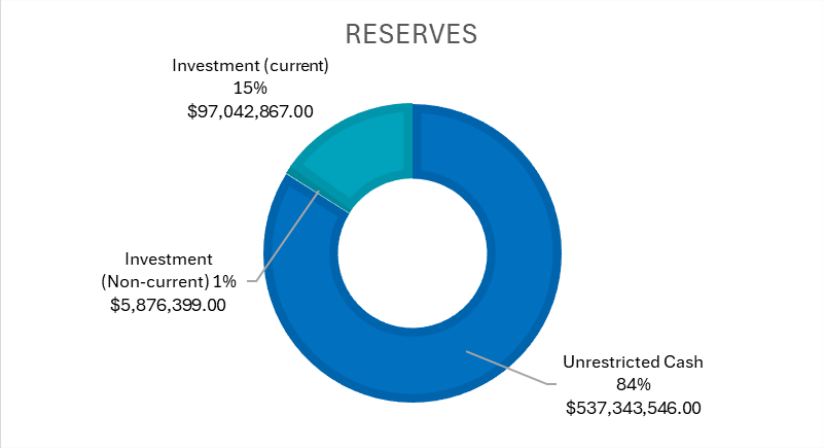
Financial Reserves:

Under Resolution 2025-23, Community Power's revised Financial Reserves Policy establishes a minimum reserve requirement of 180 days cash on hand and a reserve target of 225 days cash on hand. For Fiscal Year 2025-26, this target equates to approximately $623 million, based on projected operating expenses.

Community Power reserves at the end of the period totaled $640.3 million, or 229 days cash on hand, including $537.3 million in unrestricted cash and $102.9 million in investment holdings. Total available liquidity (including unrestricted cash, investment holdings, and available lines of credit) was $867.8 million.

Presented below are charts showing Community Power's rolling 12-month financial reserves relative to Reserve Policy thresholds, along with the composition of reserves between unrestricted cash and investments.





Presented below are the Budget to Actual results for the six months ended December 31, 2025.

SAN DIEGO COMMUNITY POWER
OPERATING FUND
BUDGETARY COMPARISON SCHEDULE
Six Months Ended December 31, 2025

	Year-to-Date				Annual	
	Budget	Actual	Budget Variance (Under) Over	Actual/ Budget %	Budget	Budget Remaining
REVENUES AND OTHER SOURCES						
Gross Ratepayer Revenues	781,665,000	$ 772,154,924	(9,510,076)	99%	1,220,987,000	$ 448,832,076
Less: Uncollectible Customer Accounts	(13,679,000)	(11,582,324)	2,096,676	85%	(21,367,000)	(9,784,676)
Other Income	-	2,392,069	2,392,069	na	-	(2,392,069)
Total Revenues and Other Sources	767,986,000	762,964,670	(5,021,330)		1,199,620,000	436,655,330
OPERATING EXPENSES						
Cost of Energy	600,327,000	550,429,217	(49,897,783)	92%	956,691,000	406,261,783
Professional Services and Consultants	12,357,000	8,965,044	(3,391,956)	73%	24,713,000	15,747,956
Personnel Costs	10,604,000	9,048,741	(1,555,259)	85%	21,209,000	12,160,259
Marketing and Outreach	1,232,000	1,144,470	(87,530)	93%	2,464,000	1,319,530
General & Administrative	2,933,000	1,973,043	(959,957)	67%	5,867,000	3,893,957
Total Operating Expenses	627,453,000	571,560,516	(55,892,484)		1,010,944,000	439,383,484
Operating Income (Loss)	140,533,000	191,404,154	50,871,154		188,676,000	(2,728,154)
NON-OPERATING REVENUES (EXPENSES)						
Investment Income	-	8,205,810	8,205,810	na	-	(8,205,810)
Interest and Related Expenses	(946,000)	(942,307)	3,693	100%	(1,893,000)	(950,693)
Transfer to Capital Investment Program	(22,170,000)	(22,170,000)	-	100%	(22,170,000)	-
Total Non-Operating Revenues (Expenses)	(23,116,000)	(14,906,496)	8,209,504		(24,063,000)	(9,156,504)
NET CHANGE	$ 117,417,000	$ 176,497,658	$ 59,080,658		$ 164,613,000	$ (11,884,658)

Investment Portfolio Report

Chandler Asset Management manages Community Power's investment portfolio. As of December 31, 2025, the market value of the portfolio was $104.6 million and in compliance with Community Power's Investment Policy. Presented below is a summary of the investment portfolio's overall characteristics.

PORTFOLIO SUMMARY

CHANDLER ASSET MANAGEMENT

San Diego Community Power | Account #11293 | As of December 31, 2025

Portfolio Characteristics

Average Modified Duration	2.55
Average Coupon	3.93%
Average Purchase YTM	4.16%
Average Market YTM	3.77%
Average Credit Quality*	AA
Average Final Maturity	3.03
Average Life	2.78

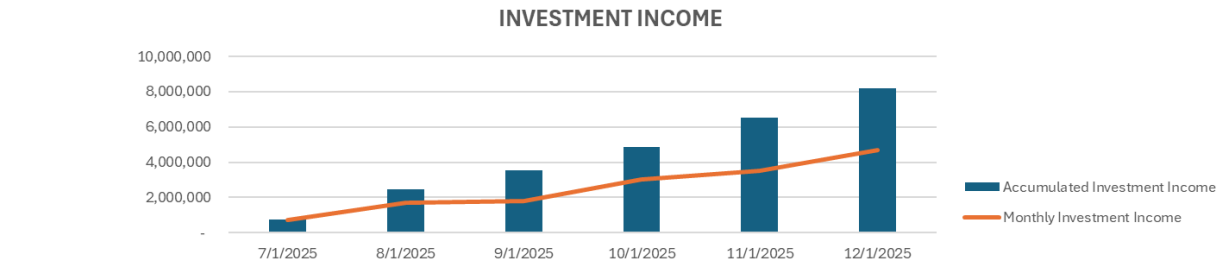
Account Summary

	End Values as of 11/30/2025	End Values as of 12/31/2025
Market Value	103,538,733.20	103,715,462.89
Accrued Interest	826,987.02	874,750.54
Total Market Value	**104,365,720.22**	**104,590,213.43**
Income Earned	271,462.34	450,099.71
Cont/WD	0.00	0.00
Par	103,181,995.69	103,534,913.78
Book Value	102,506,767.01	102,814,800.84
Cost Value	102,373,284.29	102,662,251.15

Top Issuers

United States	50.71%
FHLMC	10.19%
Chase Issuance Trust	1.68%
Guardian Life Global Funding	1.45%
The Home Depot, Inc.	1.40%
Deere & Company	1.39%
WF Card Issuance Trust	1.22%
PACCAR Inc	1.06%

The chart below presents monthly and year-to-date investment income for the first six months of FY 2026.



	7/31/2025	8/31/2025	9/30/2025	10/31/2025	11/30/2025	12/31/2025
Accumulated Investment Income	742,685	2,467,988	3,551,532	4,842,114	6,521,057	8,205,810
Monthly Investment Income	742,685	1,725,303	1,826,229	3,015,885	3,505,172	4,700,638

Contract Execution between $50,000 and $150,000

To ensure transparency and comply with Community Power's Non-Energy Procurement Policy, listed below are contracts or amendments with not-to-exceed values between $50,000 and $150,000 that were executed under the CEO's authority for the month of February 2026.

- No contracts or amendments within the $50,000 to $150,000 range were executed since the prior Board of Directors meeting on February 26, 2026.

Capital Investment Program Fund

The FY 2026-30 Capital Investment Plan (CIP) contains all the individual capital projects, major equipment purchases, and major programs for the agency that are intended to span multiple years and that are considered one-time projects rather than recurring projects.

The first year of the FY 2026-30 CIP is Community Power's capital budget shown in the Budgetary Comparison Schedule. Unspent funds are kept within the CIP and carried forward to the subsequent fiscal year. The CIP includes funding for local development feasibility studies, customer program pilot projects, member agency grants, community grants, a customer education platform, and other community-focused areas.

CAPITAL INVESTMENT PROGRAM FUND
BUDGETARY COMPARISON SCHEDULE
Six Months Ended December 31, 2025

	Annual Budget	YTD Actual	Budget Remaining
REVENUES AND OTHER SOURCES			
Transfer in from Operating Fund	$ 22,170,000	$ 22,170,000	$ -
Grant Revenue - SDREN	31,868,547	1,763,040	(30,105,507)
Grant Revenue - DAC	589,822		(589,822)
Total Revenue and Other Sources	54,628,369	23,933,040	(30,695,329)
EXPENDITURES AND OTHER USES			
Program Expenditures	54,628,369	4,498,676	$ (50,129,693)
Net increase (decrease) in fund balance	$ -	19,434,364	
Fund balance at beginning of period		10,340,567	
Fund balance at end of period		$ 29,774,931	

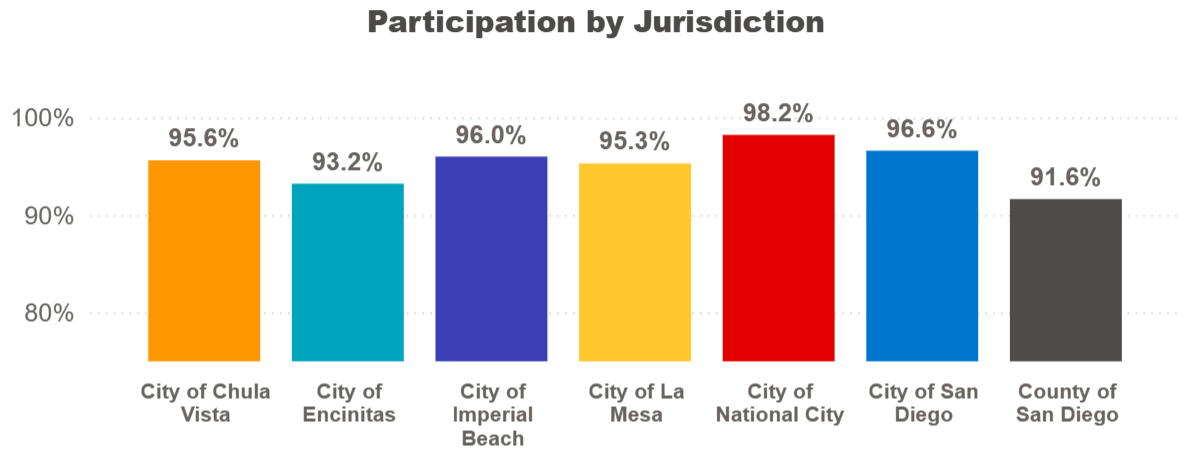
Customer Participation Rates

The participation rate for Community Power reflects full enrollment of current member agencies. We are reporting on the opt outs and eligible accounts associated with the phase based on those accounts that we have noticed for enrollment on a rolling basis as of the reporting month.

Presented below are the customer participation rates by jurisdiction as of February 2, 2026.

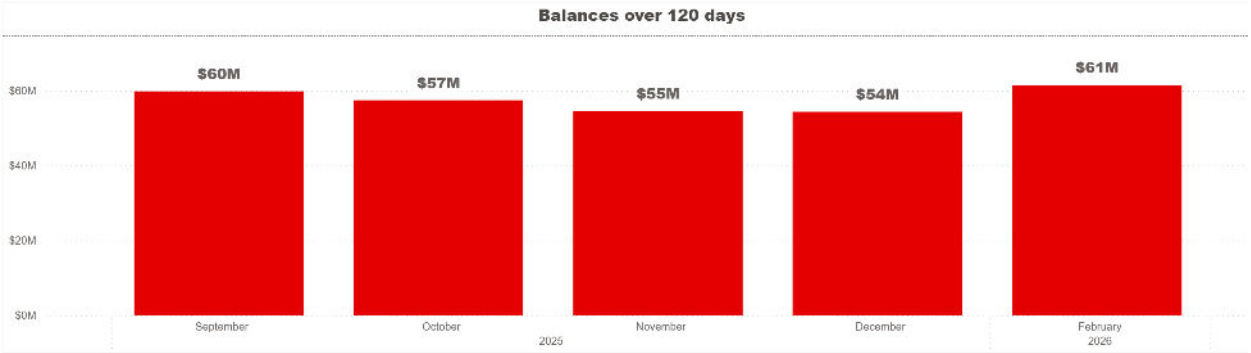
Enrolled Accounts	Participation Rate
967,927	95.5%

Participation

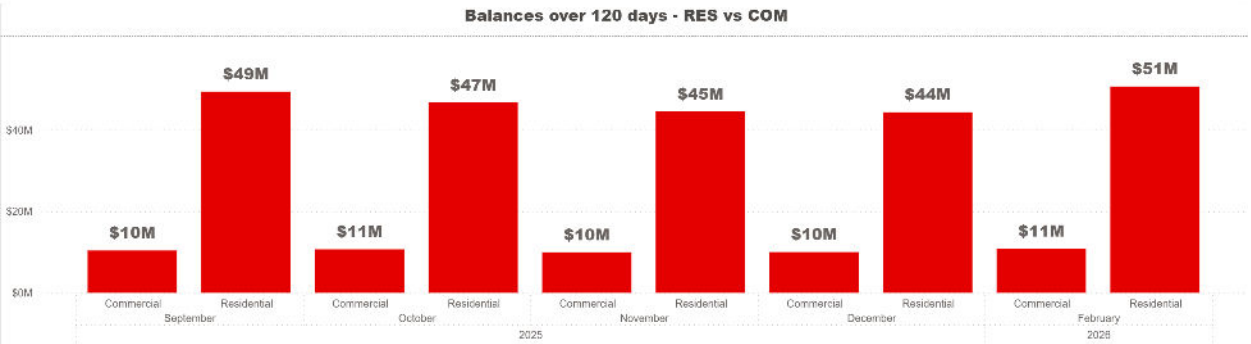


Jurisdiction	Service Option Default	Eligible Accounts	Enrolled Accounts	Participation Rate
City of Chula Vista	**PowerOn**	100,202	95,817	95.6%
City of Encinitas	**Power100**	28,945	26,985	93.2%
City of Imperial Beach	**PowerOn**	10,821	10,389	96.0%
City of La Mesa	**PowerOn**	29,630	28,238	95.3%
City of National City	**PowerOn**	19,681	19,333	98.2%
City of San Diego	**PowerOn**	633,315	611,854	96.6%
County of San Diego	**PowerOn**	191,287	175,311	91.6%
Total		**1,013,881**	**967,927**	**95.5%**

Presented below is the state of Community Power arrearages. The below arrearage data includes Community Power's receivables aged 120+ days as of February 2, 2026.



Presented below is a breakout of Community Power's arrearages data by residential and commercial customer class as of February 2, 2026.



Fiscal Impact

N/A

Strategic Plan

Consistent with the Strategic Plan objective of implementing prudent fiscal strategies to support long-term organizational sustainability.

Attachments

A: FY 2026 Year-to-Date Period Ended December 31, 2025, Financial Statements
B: Quarterly Investment Report for Period Ending December 31, 2025

ITEM 2
ATTACHMENT A

MAHER
ACCOUNTANCY

ACCOUNTANTS' COMPILATION REPORT

Management
San Diego Community Power

Management is responsible for the accompanying financial statements of San Diego Community Power (a California Joint Powers Authority) which comprise the statement of net position as of December 31, 2025, and the related statement of revenues, expenses, and changes in net position, and the statement of cash flows for the six months then ended in accordance with accounting principles generally accepted in the United States of America. We have performed a compilation engagement in accordance with Statements on Standards for Accounting and Review Services promulgated by the Accounting and Review Services Committee of the AICPA. We did not audit or review the accompanying statements nor were we required to perform any procedures to verify the accuracy or completeness of the information provided by management. Accordingly, we do not express an opinion, conclusion, nor provide any assurance on these financial statements.

Management has elected to omit substantially all of the note disclosures required by accounting principles generally accepted in the United States of America in these interim financial statements. San Diego Community Power's annual audited financial statements include the note disclosures omitted from these interim statements. If the omitted disclosures were included in these financial statements, they might influence the user's conclusions about the Authority's financial position, results of operations, and cash flows. Accordingly, these financial statements are not designed for those who are not informed about such matters.

We are not independent with respect to the Authority because we performed certain accounting services that impaired our independence.

Maher Accountancy
San Rafael, CA
February 12, 2026

1101 Fifth Avenue, Suite 200 San Rafael, CA 94901 415 459 1249 mahercpa.com

SAN DIEGO COMMUNITY POWER
STATEMENT OF NET POSITION
As of December 31, 2025

ASSETS	
Current assets	
Cash and cash equivalents - unrestricted	$ 537,343,546
Cash and cash equivalents - restricted	33,257,761
Accounts receivable, net of allowance	102,546,464
Accrued revenue	57,193,665
Prepaid expenses	3,151,512
Other receivables	4,725,352
Deposits	8,247,633
Investments	5,876,399
Total current assets	752,342,332
Noncurrent assets	
Cash and cash equivalents - restricted	14,116,978
Investments	97,042,867
Capital assets, net of depreciation and amortization	819,868
Total noncurrent assets	111,979,713
Total assets	864,322,045
LIABILITIES	
Current liabilities	
Accrued cost of electricity	115,085,873
Accounts payable	3,070,866
Other accrued liabilities	2,675,465
State surcharges payable	592,013
Deposits - energy suppliers	666,068
Bank note payable	19,000,000
Lease liability	896,302
Advances from grantors	46,227,739
Total current liabilities	188,214,326
Noncurrent liabilities	
Lease liability	143,074
Deposits - energy suppliers	3,867,810
Total noncurrent liabilities	4,010,884
Total liabilities	192,225,210
NET POSITION	
Restricted for security collateral	1,147,000
Unrestricted	670,949,835
Total net position	$ 672,096,835

SAN DIEGO COMMUNITY POWER
STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET POSITION
Six Months Ended December 31, 2025

OPERATING REVENUES	
Electricity sales, net	$ 760,572,600
Grant revenue	1,763,040
Liquidated damages revenue	2,348,023
Other income	44,046
Total operating revenues	764,727,709
OPERATING EXPENSES	
Cost of electricity	550,429,217
Contract services	10,211,051
Staff compensation	9,996,502
Other operating expenses	5,830,285
Depreciation and amortization	497,674
Total operating expenses	576,964,729
Operating income	187,762,980
NON-OPERATING REVENUES (EXPENSES)	
Investment income	8,205,810
Interest expense	(104,119)
Nonoperating revenues (expenses), net	8,101,691
CHANGE IN NET POSITION	195,864,671
Net position at beginning of year	476,232,164
Net position at end of year	$ 672,096,835

See accountants' compilation report.

SAN DIEGO COMMUNITY POWER
STATEMENT OF CASH FLOWS
Six Months Ended December 31, 2025

CASH FLOWS FROM OPERATING ACTIVITIES	
Receipts from customers	$ 790,857,459
Receipts from grantors	22,735,064
Receipts of supplier security deposits	21,855,240
Receipts from wholesale sales and other operating activities	7,292,043
Payments to suppliers for electricity	(538,463,279)
Payments for other goods and services	(17,079,910)
Payments for deposits and collateral	(5,048,014)
Payments for staff compensation	(10,042,496)
Payments of state surcharges	(1,198,539)
Net cash provided by operating activities	270,907,568
CASH FLOWS FROM NONCAPITAL FINANCING ACTIVITIES	
Proceeds from bank note	19,000,000
Net cash provided (used) by noncapital financing activities	19,000,000
CASH FLOWS FROM CAPITAL AND RELATED FINANCING ACTIVITIES	
Lease payments	(467,892)
Net cash used by capital and related financing activities	(467,892)
CASH FLOWS FROM INVESTING ACTIVITIES	
Investment income received	7,583,483
Proceeds from investment sales and maturities of investments	1,879,351
Purchase of investments	(33,358,471)
Net cash provided (used) by investing activities	(23,895,637)
Net change in cash and cash equivalent	265,544,039
Cash and cash equivalents at beginning of year	319,174,246
Cash and cash equivalents at end of year	$ 584,718,285
Reconciliation to the Statement of Net Positio	
Unrestricted cash and cash equivalents - current	$ 537,343,546
Restricted cash and cash equivalents - current	33,257,761
Restricted cash and cash equivalents - noncurrent	14,116,978
Cash and cash equivalents	$ 584,718,285
NONCASH INVESTING ACTIVITIES	
Change in fair value of investments	$ 377,506
Change in interest income receivable	$ 244,821

See accountants' compilation report.

SAN DIEGO COMMUNITY POWER
STATEMENT OF CASH FLOWS (continued)
Six Months Ended December 31, 2025

RECONCILIATION OF OPERATING INCOME TO NET CASH PROVIDED BY OPERATING ACTIVITIES

Operating income	$ 187,762,980
Adjustments to reconcile operating income to net cash provided by operating activities	
Depreciation and amortization expense	497,674
(Increase) decrease in:	
Accounts receivable, net	13,480,759
Accrued revenue	15,548,694
Prepaid expenses	20,650,623
Other receivables	(380,540)
Deposits	2,846,578
Increase (decrease) in:	
Accrued cost of electricity	12,883,707
Accounts payable	(740,106)
Advances from grantors	20,972,025
Other accrued liabilities	466,610
State surcharges payable	56,867
Deposits - energy suppliers	(3,138,303)
Net cash provided by operating activities	$ 270,907,568

See accountants' compilation report.

MAHER
ACCOUNTANCY

ACCOUNTANTS' COMPILATION REPORT

Board of Directors
San Diego Community Power

Management is responsible for the accompanying operating fund and capital investment program fund budgetary comparison schedules of San Diego Community Power (SDCP), a California Joint Powers Authority, for the six months ended December 31, 2025 and for determining that the budgetary basis of accounting is an acceptable financial reporting framework. We have performed a compilation engagement in accordance with Statements on Standards for Accounting and Review Services promulgated by the Accounting and Review Services Committee of the AICPA. We did not audit or review the accompanying statement nor were we required to perform any procedures to verify the accuracy or completeness of the information provided by management. Accordingly, we do not express an opinion, a conclusion, nor provide any assurance on this special purpose budgetary comparison statement.

These special purpose statements are prepared in accordance with the budgetary basis of accounting, which is a basis of accounting other than accounting principles generally accepted in the United States of America. This report is intended for the information of the Board of Directors of SDCP.

Management has elected to omit substantially all of the note disclosures required by accounting principles generally accepted in the United States of America in these interim financial statements. SDCP's annual audited financial statements will include the note disclosures omitted from these interim statements. If the omitted disclosures were included in these financial statements, they might influence the user's conclusions about the Authority's financial position, results of operations, and cash flows. Accordingly, these financial statements are not designed for those who are not informed about such matters.

We are not independent with respect to SDCP because we performed certain accounting services that impaired our independence.

Maher Accountancy
San Rafael, CA
February 12, 2026

1101 Fifth Avenue, Suite 200 San Rafael, CA 94901 415 459 1249 mahercpa.com

SAN DIEGO COMMUNITY POWER
OPERATING FUND
BUDGETARY COMPARISON SCHEDULE
Six Months Ended December 31, 2025

	Year-to-Date				Annual	
	Budget	Actual	Budget Variance (Under) Over	Actual/ Budget %	Budget	Budget Remaining
REVENUES AND OTHER SOURCES						
Gross Ratepayer Revenues	781,665,000	$ 772,154,924	(9,510,076)	99%	1,220,987,000	$ 448,832,076
Less: Uncollectible Customer Accounts	(13,679,000)	(11,582,324)	2,096,676	85%	(21,367,000)	(9,784,676)
Other Income	-	2,392,069	2,392,069	na	-	(2,392,069)
Total Revenues and Other Sources	767,986,000	762,964,670	(5,021,330)		1,199,620,000	436,655,330
OPERATING EXPENSES						
Cost of Energy	600,327,000	550,429,217	(49,897,783)	92%	956,691,000	406,261,783
Professional Services and Consultants	12,357,000	8,965,044	(3,391,956)	73%	24,713,000	15,747,956
Personnel Costs	10,604,000	9,048,741	(1,555,259)	85%	21,209,000	12,160,259
Marketing and Outreach	1,232,000	1,144,470	(87,530)	93%	2,464,000	1,319,530
General & Administrative	2,933,000	1,973,043	(959,957)	67%	5,867,000	3,893,957
Total Operating Expenses	627,453,000	571,560,516	(55,892,484)		1,010,944,000	439,383,484
Operating Income (Loss)	140,533,000	191,404,154	50,871,154		188,676,000	(2,728,154)
NON-OPERATING REVENUES (EXPENSES)						
Investment Income	-	8,205,810	8,205,810	na	-	(8,205,810)
Interest and Related Expenses	(946,000)	(942,307)	3,693	100%	(1,893,000)	(950,693)
Transfer to Capital Investment Program	(22,170,000)	(22,170,000)	-	100%	(22,170,000)	-
Total Non-Operating Revenues (Expenses)	(23,116,000)	(14,906,496)	8,209,504		(24,063,000)	(9,156,504)
NET CHANGE	$ 117,417,000	$ 176,497,658	$ 59,080,658		$ 164,613,000	$ (11,884,658)

See accountants' compilation report.

CAPITAL INVESTMENT PROGRAM FUND
BUDGETARY COMPARISON SCHEDULE
Six Months Ended December 31, 2025

	Annual Budget	YTD Actual	Budget Remaining
REVENUES AND OTHER SOURCES			
Transfer in from Operating Fund	$ 22,170,000	$ 22,170,000	$ -
Grant Revenue - SDREN	31,868,547	1,763,040	(30,105,507)
Grant Revenue - DAC	589,822		(589,822)
Total Revenue and Other Sources	54,628,369	23,933,040	(30,695,329)
EXPENDITURES AND OTHER USES			
Program Expenditures	54,628,369	4,498,676	$ (50,129,693)
Net increase (decrease) in fund balance	$ -	19,434,364	
Fund balance at beginning of period		10,340,567	
Fund balance at end of period		$ 29,774,931	

See accountants' compilation report.

ITEM 2
ATTACHMENT B

INVESTMENT REPORT

San Diego Community Power | As of December 31, 2025

CHANDLER ASSET MANAGEMENT | chandlerasset.com

Chandler Team:

For questions about your account, please call (800) 317-4747,
or contact clientservice@chandlerasset.com

Information contained herein is confidential. We urge you to compare this statement to the one you receive from your qualified custodian. Please see Important Disclosures at the end of the statement.

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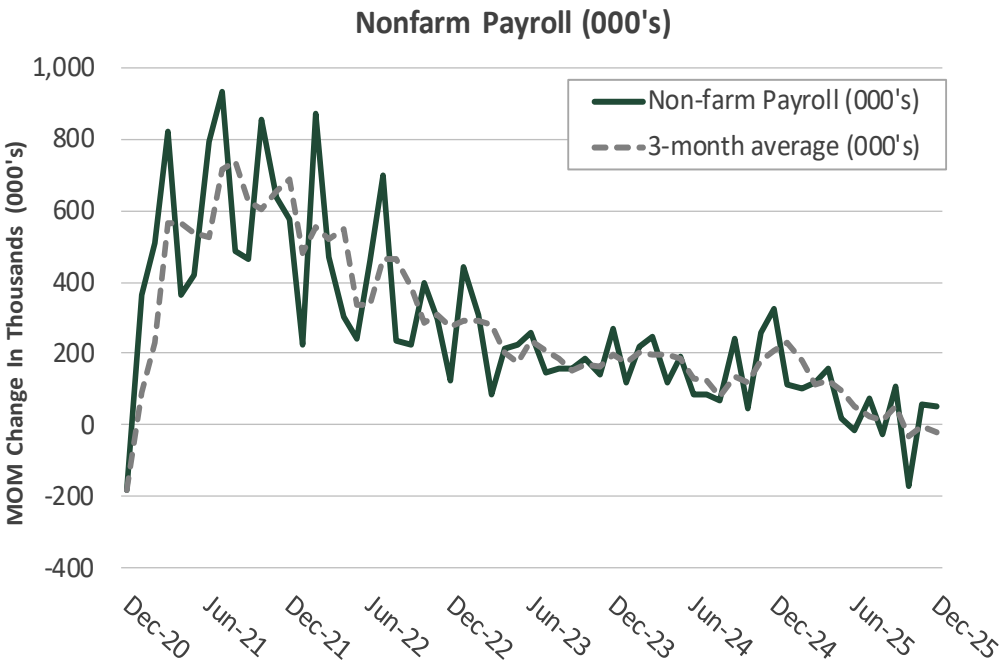
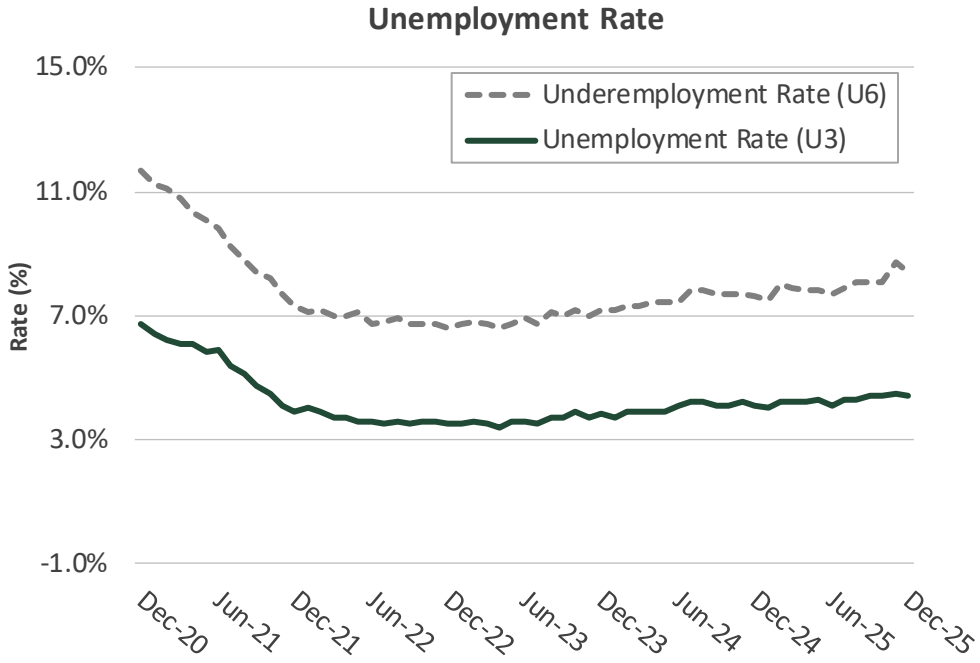
ECONOMIC UPDATE

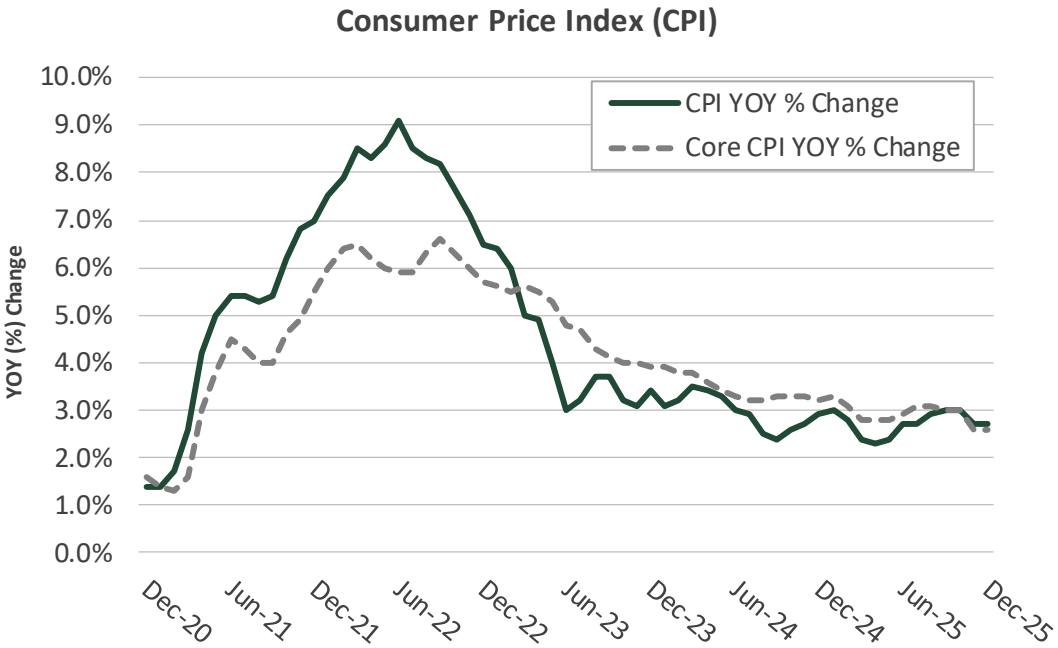


Source: US Department of Labor

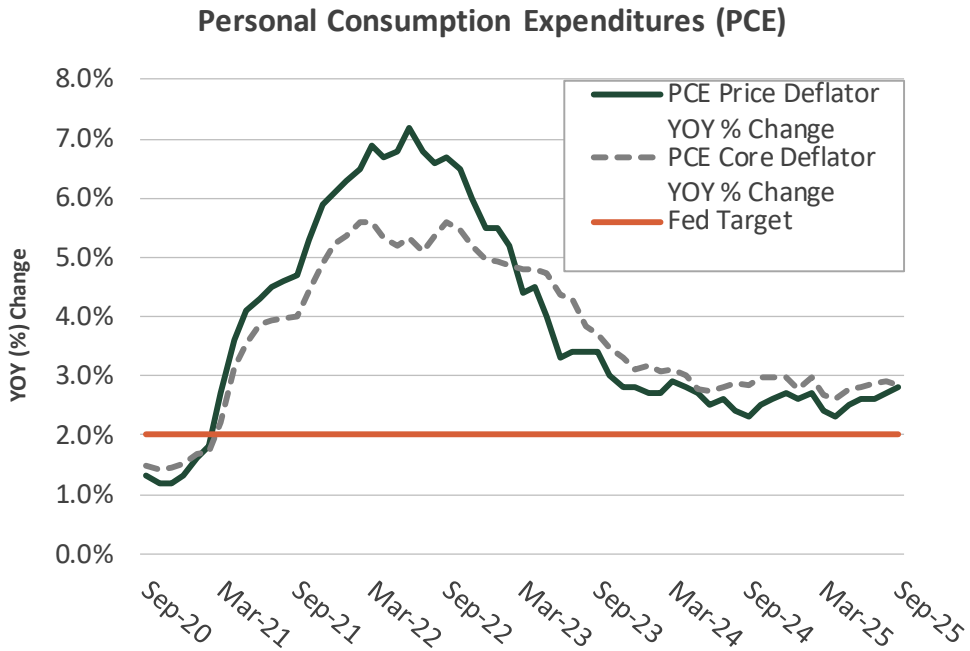


Source: US Department of Labor

The December Nonfarm Payrolls report showed weaker-than-expected job growth, with payrolls rising by 50,000 compared with the consensus estimate of 70,000. This follows a downwardly revised gain of 56,000 in November. Employment declines were most pronounced in retail trade and construction, while leisure and hospitality posted the strongest gains. Notably, the unemployment rate edged down to 4.4% after increasing to 4.6% in November.

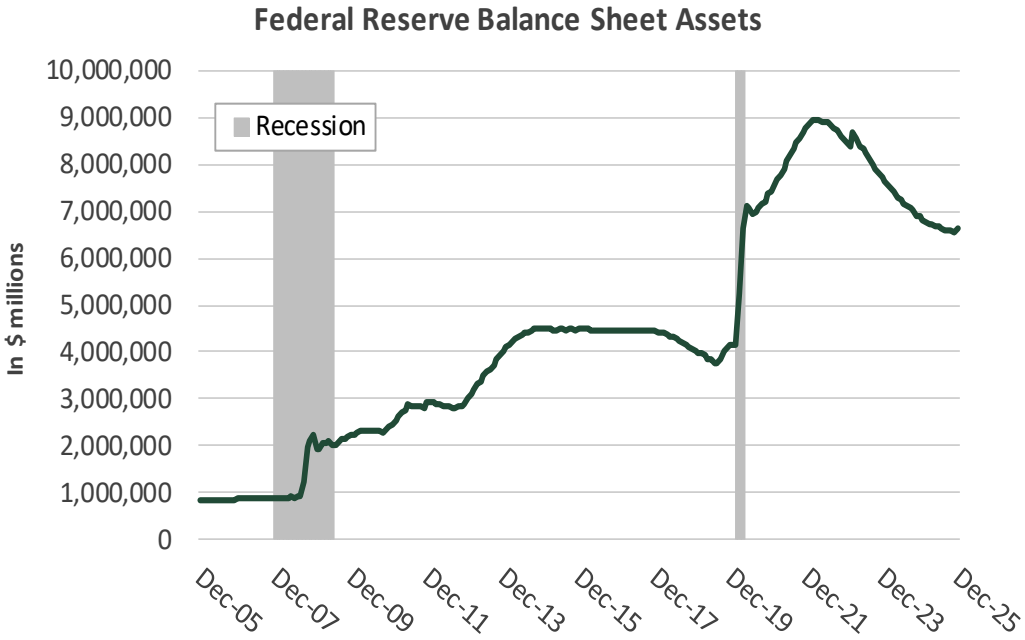


Source: US Department of Labor

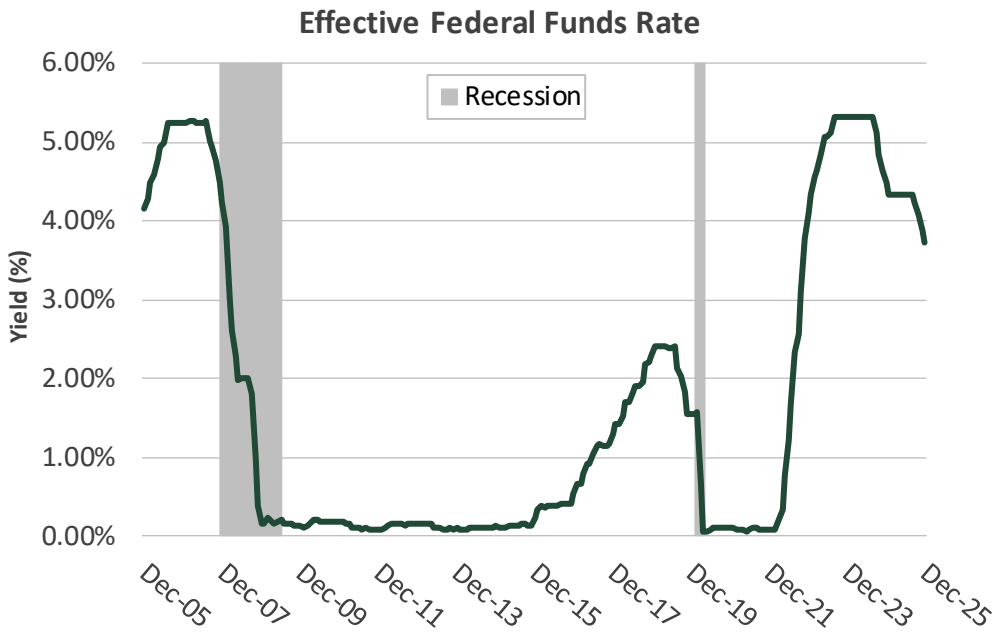


Source: US Department of Commerce

The Consumer Price Index (CPI) showed that inflation remained relatively subdued in December, with headline CPI and core CPI holding at 2.7% and 2.6% respectively year-over-year. Shelter has continued to play a central but gradually moderating role in services inflation. December data keeps inflation close to the prior month's pace and consistent with a trend of easing price pressures. The Personal Consumption Expenditures (PCE) Index for September, released on December 5, showed headline inflation up 0.3% from August and 2.8% year over year. Core PCE rose 0.2% on the month and 2.8% on an annual basis.

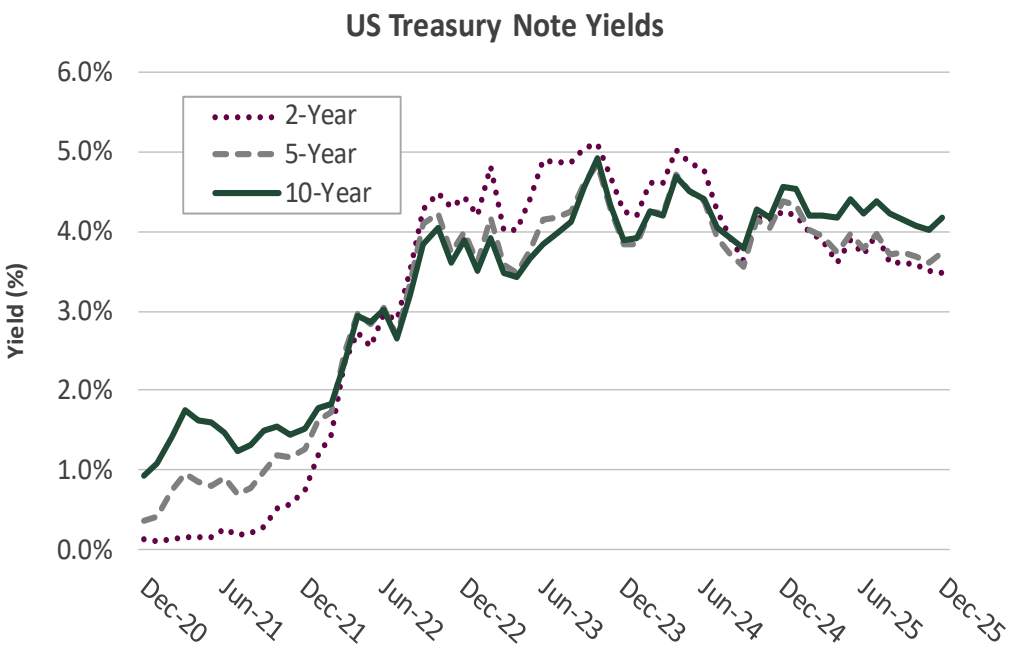


Source: Federal Reserve

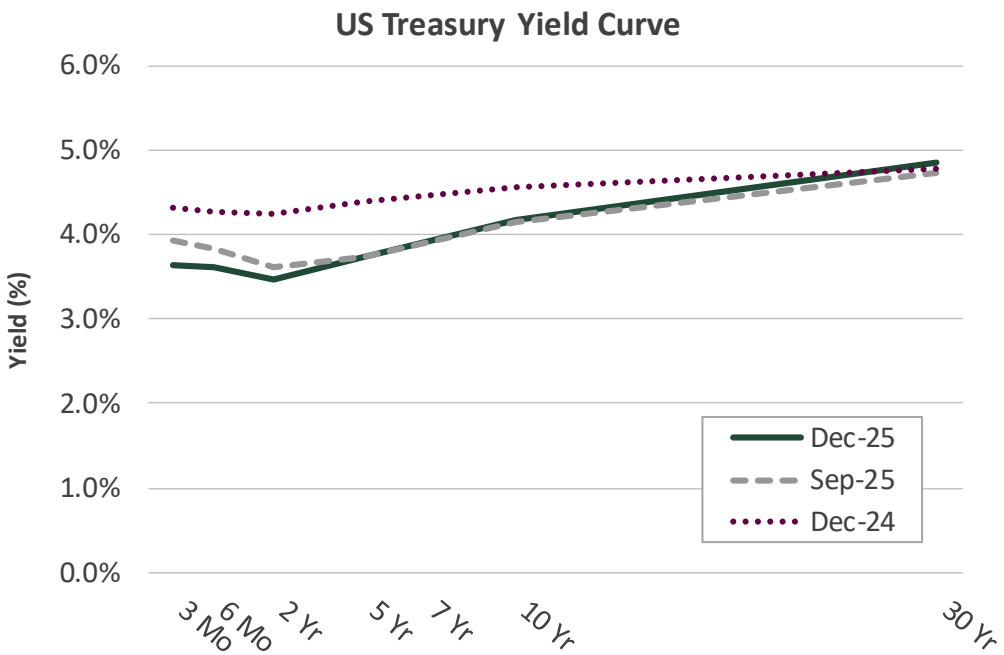


Source: Bloomberg

The Federal Reserve lowered its benchmark interest rate by a quarter point to a target range of 3.50% to 3.75% at its December meeting, citing concerns about emerging weakness in the labor market. A few policymakers dissented, arguing that tighter monetary policy may still be warranted to ensure progress on price stability. Beginning December 1, the Fed also halted its balance sheet runoff, announcing that principal and interest payments from its holdings will be reinvested in Treasury securities to maintain ample reserves and support market stability.



Source: Bloomberg



Source: Bloomberg

At the end of December, the 2-year yield was 77 basis points lower, and the 10-year yield was 40 basis points lower, year-over-year. The spread between the 2-year and 10-year Treasury yield points on the curve increased to +69 basis points at December month-end versus +52 basis points at November month-end. The prior 2-year/10-year yield curve inversion, which spanned from July 2022 to August 2024, was historically long. The average historical spread (since 2005) is about +95 basis points. The spread between the 3-month and 10-year Treasury yield points on the curve was +54 basis points in December versus +21 basis points in November.

CHANDLER ASSET MANAGEMENT

ACCOUNT PROFILE

CHANDLER ASSET MANAGEMENT

Investment Objectives

The investment objectives of the San Diego Community Power are first, to provide safety of principal to ensure the preservation of capital in the overall portfolio; second, to provide sufficient liquidity to meet all disbursement requirements; and third, to earn an acceptable rate of return after first considering safety of principal and liquidity.

Chandler Asset Management Performance Objective

The performance objective for the portfolio is to earn a total rate of return through a market cycle that is equal to or above the return on the benchmark index.

Strategy

In order to achieve this objective, the portfolio invests in high-quality fixed income securities that comply with the investment policy and all regulations governing the funds.

PORTFOLIO CHARACTERISTICS

CHANDLER ASSET MANAGEMENT

San Diego Community Power ConsAgg | Account #11452 | As of December 31, 2025

	12/31/2025 Portfolio	9/30/2025 Portfolio
Average Maturity (yrs)	0.48	0.66
Average Modified Duration	0.41	0.56
Average Purchase Yield	3.60%	3.16%
Average Market Yield	3.54%	3.09%
Average Quality**	AA	AA
Total Market Value	651,186,199	450,252,239

*Benchmark: NO BENCHMARK REQUIRED
**The credit quality is a weighted average calculation of the highest of S&P, Moody's and Fitch.

STATEMENT OF COMPLIANCE

CHANDLER ASSET MANAGEMENT

San Diego Community Power ConsAgg | Account #11452 | As of December 31, 2025

Rules Name	Limit	Actual	Compliance Status	Notes
AGENCY MORTGAGE SECURITIES				
Max % (MV)	100.0	1.6	Compliant	
Max % Issuer (MV)	30.0	1.6	Compliant	
Max Maturity (Years)	5.0	4.8	Compliant	
Min Rating (A-1 by 1, A- by 1)	0.0	0.0	Compliant	
ASSET-BACKED SECURITIES (ABS)				
Max % (MV; ABS & MBS)	20.0	3.1	Compliant	
Max % Issuer (MV)	5.0	0.3	Compliant	
Max Maturity (Years)	5.0	4.5	Compliant	
Min Rating (AA- by 1)	0.0	0.0	Compliant	
BANKERS' ACCEPTANCES				
Max % (MV)	40.0	0.0	Compliant	
Max % Issuer (MV)	5.0	0.0	Compliant	
Max Maturity (Days)	180.0	0.0	Compliant	
Min Rating (A-1 by 1)	0.0	0.0	Compliant	
CERTIFICATE OF DEPOSIT PLACEMENT SERVICE				
Max % (MV)	50.0	26.9	Compliant	
Max Maturity (Years)	5.0	0.0	Compliant	
Min Rating (A-1 by 1, A- by 1)	0.0	0.0	Compliant	
COLLATERALIZED BANK DEPOSITS				
Max % (MV)	100.0	40.3	Compliant	
Max Maturity (Years)	5.0	0.0	Compliant	
COLLATERALIZED TIME DEPOSITS (NON-NEGOTIABLE CD/TD)				
Max % (MV)	30.0	0.0	Compliant	
Max % Issuer (MV)	5.0	0.0	Compliant	
Max Maturity (Years)	5.0	0.0	Compliant	
Min Rating (A-1 by 1)	0.0	0.0	Compliant	
COMMERCIAL PAPER				
Max % (MV)	25.0	0.0	Compliant	

STATEMENT OF COMPLIANCE

CHANDLER ASSET MANAGEMENT

San Diego Community Power ConsAgg | Account #11452 | As of December 31, 2025

Rules Name	Limit	Actual	Compliance Status	Notes
Max % Issuer (MV)	5.0	0.0	Compliant	
Max Maturity (Days)	270.0	0.0	Compliant	
Min Rating (A-1 by 1, A- by 1)	0.0	0.0	Compliant	
CORPORATE MEDIUM TERM NOTES				
Max % (MV)	30.0	4.3	Compliant	
Max % Issuer (MV)	5.0	0.2	Compliant	
Max Maturity (Years)	5.0	4.9	Compliant	
Min Rating (A- by 1)	0.0	0.0	Compliant	
FDIC INSURED TIME DEPOSITS (NON-NEGOTIABLE CD/TD)				
Max % (MV)	30.0	0.0	Compliant	
Max % Issuer (MV)	5.0	0.0	Compliant	
Max Maturity (Years)	5.0	0.0	Compliant	
Min Rating (A-1 by 1, A- by 1)	0.0	0.0	Compliant	
FEDERAL AGENCIES				
Max % (MV)	100.0	0.1	Compliant	
Max % Issuer (MV)	30.0	0.1	Compliant	
Max Callables (MV)	20.0	0.0	Compliant	
Max Maturity (Years)	5.0	1.6	Compliant	
Min Rating (A-1 by 1, A- by 1)	0.0	0.0	Compliant	
JOINT POWERS AUTHORITY (JPA) / LOCAL GOVERNMENT INVESTMENT POOL (LGIP)				
Max % (MV)	100.0	0.0	Compliant	
LOCAL AGENCY INVESTMENT FUND (LAIF)				
Max % (MV)	100.0	0.0	Compliant	
MONEY MARKET MUTUAL FUNDS				
Max % (MV)	20.0	0.1	Compliant	
Max % Issuer (MV)	20.0	0.1	Compliant	
Min Rating (AAA by 2)	0.0	0.0	Compliant	
MORTGAGE-BACKED SECURITIES (NON-AGENCY)				

STATEMENT OF COMPLIANCE

CHANDLER ASSET MANAGEMENT

San Diego Community Power ConsAgg | Account #11452 | As of December 31, 2025

Rules Name	Limit	Actual	Compliance Status	Notes
Max % (MV; ABS & MBS)	20.0	3.1	Compliant	
Max % Issuer (MV)	5.0	0.0	Compliant	
Max Maturity (Years)	5.0	0.0	Compliant	
Min Rating (AA- by 1)	0.0	0.0	Compliant	
MUNICIPAL SECURITIES				
Max % (MV)	30.0	0.1	Compliant	
Max % Issuer (MV)	5.0	0.1	Compliant	
Max Maturity (Years)	5.0	3.8	Compliant	
Min Rating (A-1 by 1 or A- by 1)	0.0	0.0	Compliant	
NEGOTIABLE CERTIFICATES OF DEPOSIT (NCD)				
Max % (MV)	30.0	0.0	Compliant	
Max % Issuer (MV)	5.0	0.0	Compliant	
Max Maturity (Years)	5.0	0.0	Compliant	
Min Rating (A-1 or A- by 1)	0.0	0.0	Compliant	
SRI PROHIBITED INVESTMENTS				
Prohibited Investment - Fossil Fuels	0.0	0.0	Compliant	
SUPRANATIONAL OBLIGATIONS				
Max % (MV)	30.0	0.2	Compliant	
Max % Issuer (MV)	10.0	0.2	Compliant	
Max Maturity (Years)	5.0	4.8	Compliant	
Min Rating (AA- by 1)	0.0	0.0	Compliant	
U.S. TREASURIES				
Max % (MV)	100.0	8.1	Compliant	
Max Maturity (Years)	5.0	4.8	Compliant	
Min Rating (A-1 by 1, A- by 1)	0.0	0.0	Compliant	

PORTFOLIO CHARACTERISTICS

CHANDLER ASSET MANAGEMENT

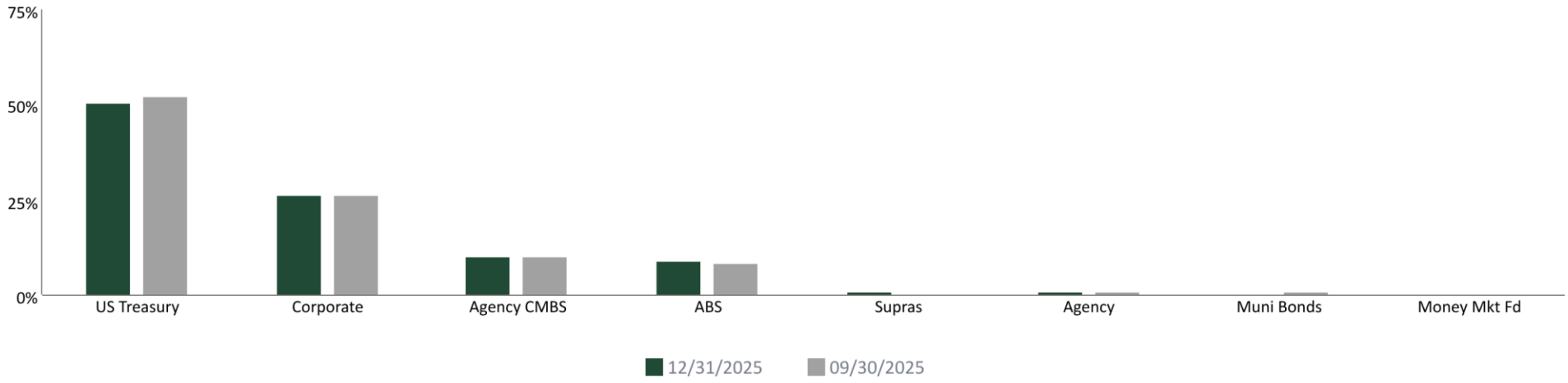
San Diego Community Power | Account #11293 | As of December 31, 2025

	Benchmark*	12/31/2025 Portfolio	9/30/2025 Portfolio
Average Maturity (yrs)	2.64	3.03	3.18
Average Modified Duration	2.47	2.55	2.69
Average Purchase Yield		4.16%	4.20%
Average Market Yield	3.55%	3.77%	3.86%
Average Quality**	AA+	AA	AA
Total Market Value		104,590,213	93,445,189

*Benchmark: ICE BofA 1-5 Year Unsubordinated US Treasury & Agency Index
**The credit quality is a weighted average calculation of the highest of S&P, Moody's and Fitch.

SECTOR DISTRIBUTION

San Diego Community Power | Account #11293 | As of December 31, 2025



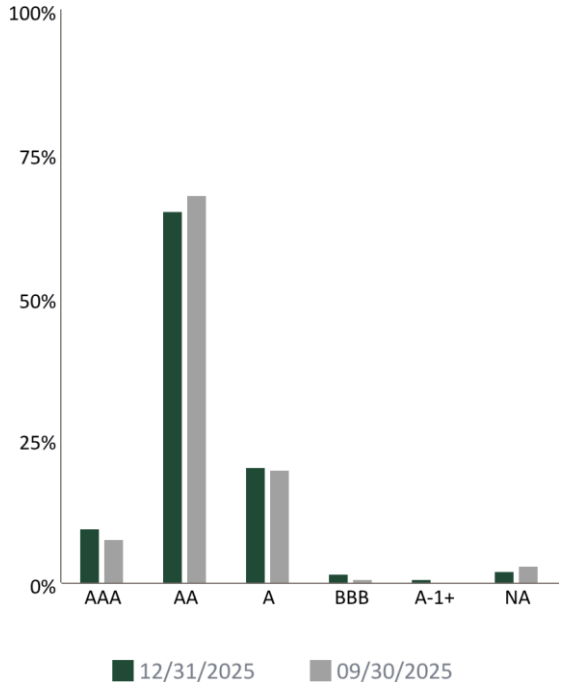
Sector as a Percentage of Market Value

Sector	12/31/2025	09/30/2025
US Treasury	50.72%	52.31%
Corporate	26.66%	26.37%
Agency CMBS	10.19%	10.32%
ABS	9.38%	8.81%
Supras	0.95%	--
Agency	0.87%	0.97%
Muni Bonds	0.86%	0.95%
Money Mkt Fd	0.38%	0.26%

QUALITY DISTRIBUTION

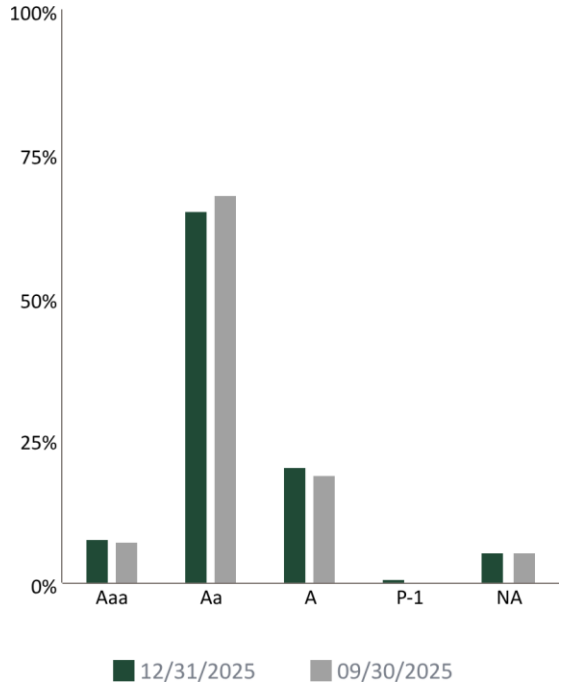
San Diego Community Power | Account #11293 | As of December 31, 2025

S&P Rating



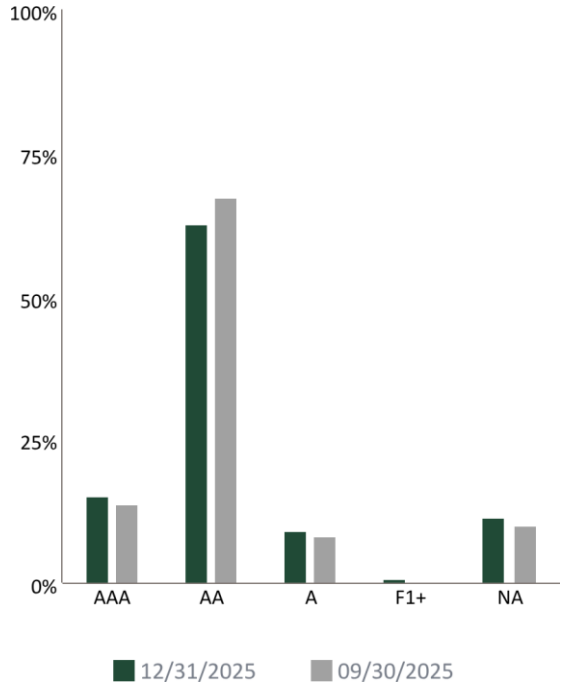
Rating	12/31/2025	09/30/2025
AAA	9.64%	7.95%
AA	65.07%	67.86%
A	20.29%	19.93%
BBB	1.83%	0.99%
A-1+	0.95%	--
NA	2.21%	3.28%

Moody's Rating



Rating	12/31/2025	09/30/2025
Aaa	7.74%	7.51%
Aa	65.28%	68.09%
A	20.42%	19.03%
P-1	0.95%	--
NA	5.61%	5.37%

Fitch Rating

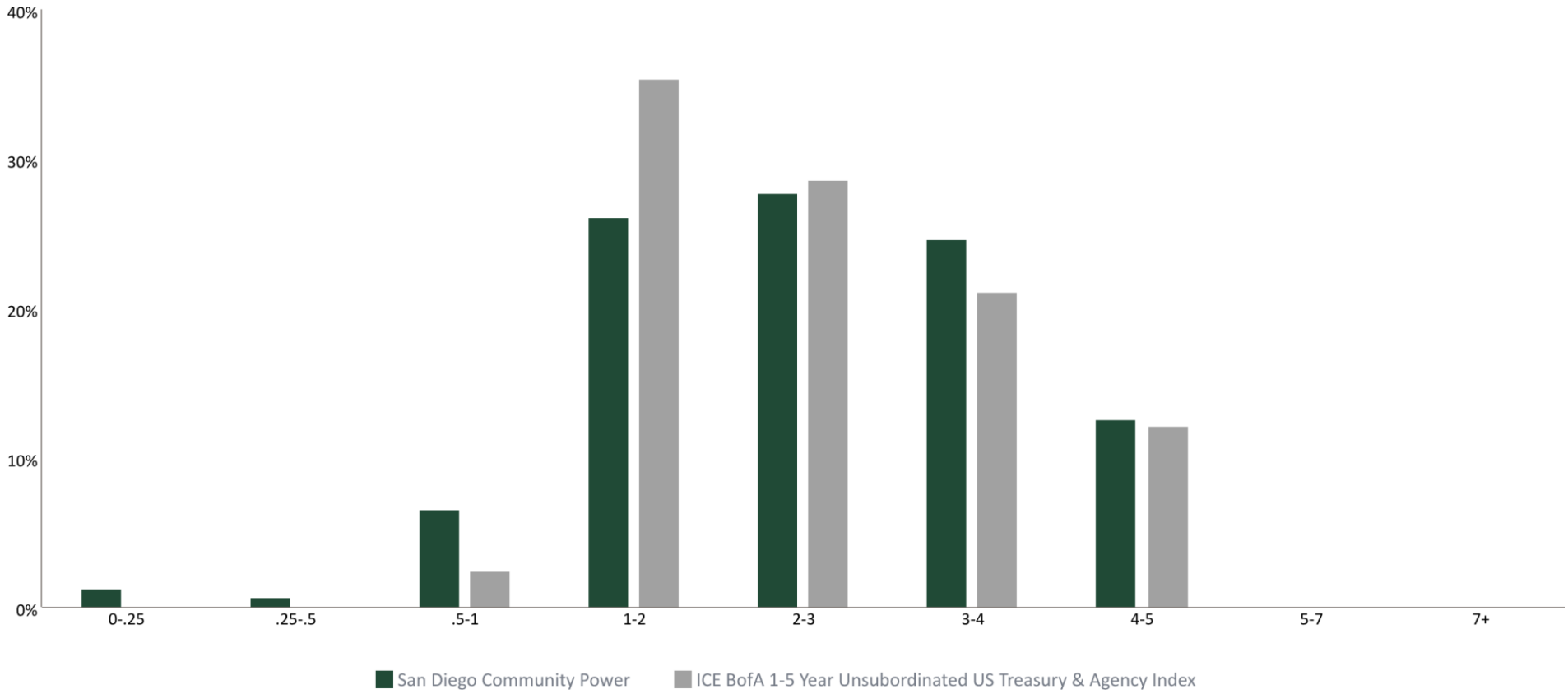


Rating	12/31/2025	09/30/2025
AAA	15.19%	14.08%
AA	62.72%	67.51%
A	9.31%	8.25%
F1+	0.95%	--
NA	11.82%	10.16%

DURATION DISTRIBUTION

San Diego Community Power | Account #11293 | As of December 31, 2025

Portfolio Compared to the Benchmark

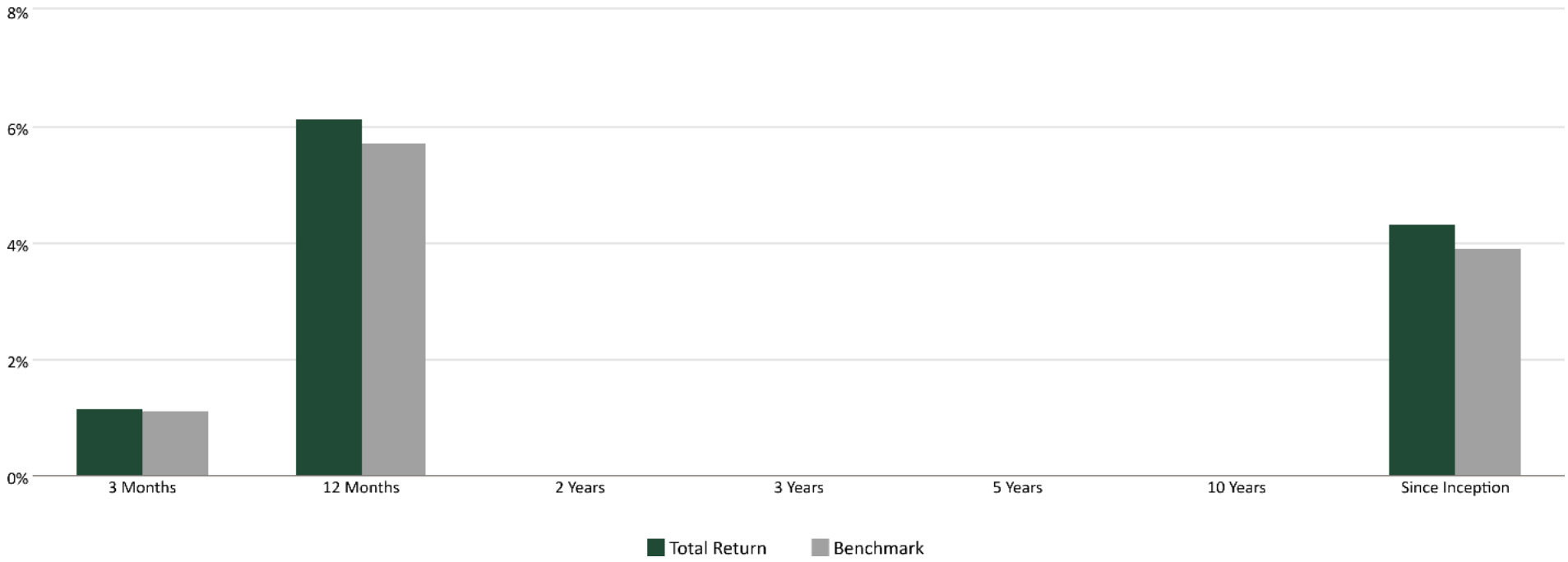


	0-.25	.25-.5	.5-1	1-2	2-3	3-4	4-5	5-7	7+
Portfolio	1.3%	0.8%	6.6%	26.2%	27.9%	24.7%	12.6%	0.0%	0.0%
ICE BofA 1-5 Year Unsubordinated US Treasury & Agency Index	0.0%	0.0%	2.5%	35.4%	28.7%	21.2%	12.3%	0.0%	0.0%

INVESTMENT PERFORMANCE

San Diego Community Power | Account #11293 | As of December 31, 2025

Total Rate of Return : Inception | 10/01/2024



TOTAL RATE OF RETURN*	3 Months	12 Months	2 Years	3 Years	5 Years	10 Years	Since Inception
San Diego Community Power	1.19%	6.17%					4.34%
Benchmark	*1.11%*	*5.73%*					*3.92%*

*Periods over 1 year are annualized.
Total rate of return: A measure of a portfolio's performance over time. It is the internal rate of return, which equates the beginning value of the portfolio with the ending market value; it includes interest earnings, realized and unrealized gains and losses in the portfolio.
Benchmark: ICE BofA 1-5 Year Unsubordinated US Treasury & Agency Index

PORTFOLIO CHARACTERISTICS

CHANDLER ASSET MANAGEMENT

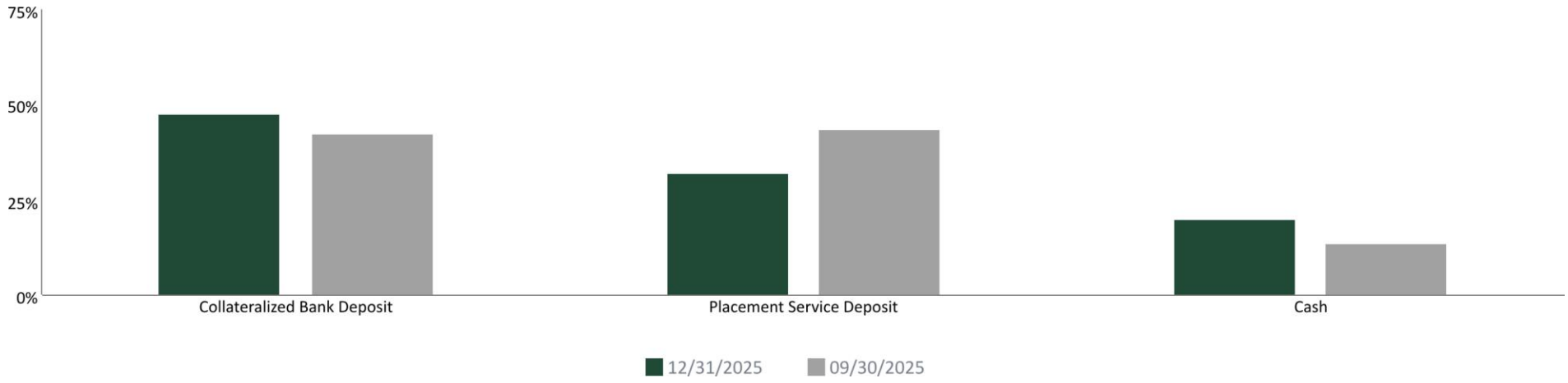
San Diego Community Power Reporting | Account #11451 | As of December 31, 2025

	12/31/2025 Portfolio	9/30/2025 Portfolio
Average Maturity (yrs)	0.00	0.00
Average Modified Duration	0.00	0.00
Average Purchase Yield	3.50%	2.89%
Average Market Yield	3.50%	2.89%
Average Quality**	NA	NA
Total Market Value	546,595,985	356,807,050

*Benchmark: NO BENCHMARK REQUIRED
**The credit quality is a weighted average calculation of the highest of S&P, Moody's and Fitch.

SECTOR DISTRIBUTION

San Diego Community Power Reporting | Account #11451 | As of December 31, 2025



Sector as a Percentage of Market Value

Sector	12/31/2025	09/30/2025
Collateralized Bank Deposit	48.01%	42.51%
Placement Service Deposit	32.06%	43.57%
Cash	19.92%	13.92%
LAIF	0.02%	--

CHANDLER ASSET MANAGEMENT

PORTFOLIO HOLDINGS

San Diego Community Power ConsAgg | Account #11452 | As of December 31, 2025

Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
ABS									
36269WAD1	GMALT 2024-2 A3 5.39 07/20/2027	401,965.26	-- 4.65%	406,875.28 403,444.01	100.42 4.24%	403,637.84 662.01	0.06% 193.83	NA/AAA AAA	1.55 0.34
02582JJZ4	AMXCA 2023-1 A 4.87 05/15/2026	150,000.00	09/12/2024 4.24%	151,617.19 150,355.83	100.37 3.90%	150,548.70 324.67	0.02% 192.87	NA/AAA AAA	0.37 0.36
362962AD4	GMALT 2025-2 A3 4.58 05/22/2028	285,000.00	05/20/2025 4.84%	284,995.27 284,996.21	100.90 3.87%	287,557.59 398.84	0.04% 2,561.38	NA/AAA AAA	2.39 1.18
096912AD2	BMWLT 2025-1 A3 4.43 06/26/2028	630,000.00	11/14/2025 3.99%	633,912.89 633,640.32	100.86 3.79%	635,444.46 465.15	0.10% 1,804.14	NA/AAA AAA	2.49 1.27
47800RAD5	JDOT 2024 A3 4.96 11/15/2028	200,000.00	07/30/2024 4.82%	200,781.25 200,443.92	100.88 3.98%	201,752.60 440.89	0.03% 1,308.68	Aaa/NA AAA	2.88 0.85
437930AC4	HAROT 2024-2 A3 5.27 11/20/2028	145,549.76	07/19/2024 4.94%	146,783.52 146,273.61	101.21 3.84%	147,310.19 276.99	0.02% 1,036.58	NA/AAA AAA	2.89 0.81
89237NAD9	TAOT 2024-B A3 5.33 01/16/2029	149,101.52	07/19/2024 4.94%	150,639.13 150,029.62	101.04 4.06%	150,655.00 353.20	0.02% 625.38	Aaa/AAA NA	3.04 0.78
161571HV9	CHAIT 241 A 4.6 01/16/2029	225,000.00	-- 4.61%	225,167.97 224,935.67	100.90 3.75%	227,015.78 460.00	0.03% 2,080.10	NA/AAA AAA	3.04 0.99
92970QAA3	WFCIT 2024-1 A 4.94 02/15/2029	500,000.00	07/30/2025 4.31%	504,980.47 503,622.96	101.32 3.76%	506,619.50 1,097.78	0.08% 2,996.54	Aaa/AAA AAA	3.13 1.07
096919AD7	BMWOT 2024-A A3 5.18 02/26/2029	147,841.98	07/19/2024 4.86%	148,852.62 148,452.66	100.91 3.98%	149,191.34 127.64	0.02% 738.67	Aaa/AAA NA	3.16 0.73
43813YAC6	HAROT 2024-3 A3 4.57 03/21/2029	155,000.00	08/09/2024 4.66%	154,975.65 154,982.90	100.76 3.84%	156,178.00 196.76	0.02% 1,195.10	Aaa/NA AAA	3.22 0.97
34531QAD1	FORDO 2024-B A3 5.1 04/15/2029	150,000.00	07/18/2024 4.79%	151,078.13 150,650.02	101.29 3.93%	151,929.45 340.00	0.02% 1,279.43	Aaa/AAA NA	3.29 1.04
587918AD5	MBART 2024-1 A3 4.8 04/16/2029	250,440.46	-- 4.58%	251,814.95 251,292.08	100.70 3.97%	252,186.28 534.27	0.04% 894.19	Aaa/AAA NA	3.29 0.79
58768YAD7	MBALT 2025-A A3 4.61 04/16/2029	310,000.00	05/14/2025 4.66%	309,962.21 309,968.17	101.32 3.94%	314,087.66 635.16	0.05% 4,119.49	NA/AAA AAA	3.29 1.84
05522RDJ4	BACCT 2024-1 A 4.93 05/15/2029	193,000.00	07/30/2024 4.58%	194,771.68 193,868.44	101.57 3.78%	196,023.54 422.88	0.03% 2,155.10	Aaa/AAA NA	3.37 1.30
477911AD3	JDOT 2024-C A3 4.06 06/15/2029	500,000.00	01/22/2025 4.72%	493,320.31 494,748.70	100.30 3.90%	501,517.00 902.22	0.08% 6,768.30	Aaa/NA AAA	3.45 1.56

San Diego Community Power ConsAgg | Account #11452 | As of December 31, 2025

Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
02589BAE0	AMXCA 2024-3 A 4.65 07/15/2027	400,000.00	-- 2.88%	400,535.16 400,328.31	101.37 3.76%	405,474.80 826.67	0.06% 5,146.49	NA/AAA AAA	1.54 1.46
34535VAD6	FORDO 2024-D A3 4.61 08/15/2029	210,000.00	11/19/2024 4.66%	209,993.26 209,994.84	101.10 3.89%	212,309.79 430.27	0.03% 2,314.95	Aaa/NA AAA	3.62 1.43
89240JAD3	TAOT 2025-A A3 4.64 08/15/2029	300,000.00	01/22/2025 4.69%	299,987.97 299,990.41	101.07 3.95%	303,211.20 618.67	0.05% 3,220.79	Aaa/NA AAA	3.62 1.46
47800DAD6	JDOT 2025 A3 4.23 09/17/2029	245,000.00	03/04/2025 5.09%	244,984.59 244,987.35	100.75 3.85%	246,827.70 460.60	0.04% 1,840.35	Aaa/NA AAA	3.71 1.77
44935CAD3	HART 2025-A A3 4.32 10/15/2029	310,000.00	03/04/2025 4.84%	309,954.27 309,962.31	100.74 3.90%	312,295.55 595.20	0.05% 2,333.24	NA/AAA AAA	3.79 1.61
437921AD1	HAROT 252 A3 4.15 10/15/2029	190,000.00	04/29/2025 4.15%	189,978.78 189,981.90	100.61 3.84%	191,162.23 350.44	0.03% 1,180.33	Aaa/NA AAA	3.79 1.77
89231HAD8	TAOT 2025-B A3 4.34 11/15/2029	190,000.00	04/24/2025 4.82%	189,989.11 189,990.72	100.78 3.93%	191,490.93 366.49	0.03% 1,500.21	NA/AAA AAA	3.87 1.72
362955AD8	GMCAR 2025-1 A3 4.62 12/17/2029	200,000.00	01/09/2025 5.03%	199,985.14 199,988.04	101.03 3.89%	202,054.00 385.00	0.03% 2,065.96	Aaa/NA AAA	3.96 1.32
58773DAD6	MBART 2025-1 A3 4.78 12/17/2029	290,000.00	01/14/2025 4.84%	289,938.32 289,950.15	101.45 3.85%	294,197.17 616.09	0.05% 4,247.02	Aaa/NA AAA	3.96 1.47
02582JKP4	AMXCA 2025-2 A 4.28 04/15/2030	505,000.00	05/06/2025 4.28%	504,990.86 504,992.04	101.14 3.79%	510,764.07 960.62	0.08% 5,772.03	NA/AAA AAA	4.29 2.14
362549AD9	GMCAR 2025-2 A3 4.28 04/16/2030	150,000.00	05/06/2025 4.71%	149,977.92 149,980.77	100.76 3.82%	151,136.85 267.50	0.02% 1,156.08	Aaa/AAA NA	4.29 1.52
92970QAJ4	WFCIT 2025-1 A 4.34 05/15/2030	750,000.00	09/03/2025 3.90%	759,023.44 757,932.19	101.33 3.78%	759,956.25 1,446.67	0.12% 2,024.06	NA/AAA AAA	4.37 2.21
161571HZ0	CHAIT 2025-1 A 4.16 07/15/2030	1,500,000.00	-- 3.83%	1,513,632.81 1,512,512.05	100.97 3.79%	1,514,578.50 2,773.33	0.23% 2,066.45	NA/AAA AAA	4.54 2.36
Total ABS		**9,632,898.98**	**4.35%**	**9,673,500.15** **9,662,296.23**	**100.98** **3.86%**	**9,727,113.96** **17,736.01**	**1.50%** **64,817.73**		**3.44** **1.54**
AGENCY									
3133ERKR1	FEDERAL FARM CREDIT BANKS FUNDING CORP 4.625 07/10/2026	200,000.00	07/23/2024 4.51%	200,424.00 200,112.51	100.52 3.61%	201,042.20 4,393.75	0.03% 929.69	Aa1/AA+ AA+	0.52 0.50

San Diego Community Power ConsAgg | Account #11452 | As of December 31, 2025

Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
3130B2PJ8	FEDERAL HOME LOAN BANKS 3.625 09/04/2026	500,000.00	09/12/2024 3.70%	499,335.00 499,773.11	100.01 3.60%	500,060.50 5,890.63	0.08% 287.39	Aa1/AA+ AA+	0.68 0.65
3133ERMB4	FEDERAL FARM CREDIT BANKS FUNDING CORP 4.25 07/23/2027	200,000.00	07/18/2024 4.26%	199,938.00 199,967.84	101.12 3.50%	202,243.60 3,730.56	0.03% 2,275.76	Aa1/AA+ AA+	1.56 1.47
Total Agency		**900,000.00**	**4.00%**	**899,697.00 899,853.46**	**100.37 3.58%**	**903,346.30 14,014.93**	**0.14% 3,492.84**		**0.84 0.80**
AGENCY CMBS									
3137FJEH8	FHMS K-081 A2 3.9 08/25/2028	200,000.00	07/18/2024 4.54%	195,093.75 196,852.66	100.08 3.79%	200,168.00 650.00	0.03% 3,315.34	Aa1/AA+ AAA	2.65 2.45
3137FJKE8	FHMS K-082 A2 3.92 09/25/2028	413,000.00	08/29/2024 4.07%	410,096.09 411,060.08	100.21 3.76%	413,852.85 1,349.13	0.06% 2,792.77	Aa1/AA+ AAA	2.74 2.48
3137FJZ93	FHMS K-084 A2 3.78 10/25/2028	400,000.00	-- 4.29%	391,750.00 394,561.94	99.77 3.80%	399,094.40 1,260.00	0.06% 4,532.46	Aaa/AA+ AA+	2.82 2.57
3137FK4M5	FHMS K-085 A2 4.06 10/25/2028	700,000.00	07/30/2025 4.17%	696,472.66 696,941.75	100.49 3.80%	703,413.90 2,368.33	0.11% 6,472.15	Aaa/AA+ AA+	2.82 2.58
3137FKSH0	FHMS K-086 A2 3.859 11/25/2028	400,000.00	-- 4.29%	392,882.81 395,263.39	99.97 3.81%	399,864.00 1,286.33	0.06% 4,600.61	Aaa/AA+ AA+	2.90 2.66
3137FKUP9	FHMS K-087 A2 3.771 12/25/2028	582,993.83	12/11/2024 4.39%	569,489.32 573,047.56	99.74 3.81%	581,456.47 1,832.06	0.09% 8,408.91	Aa1/AAA AA+	2.99 2.65
3137FKZZ2	FHMS K-088 A2 3.69 01/25/2029	303,000.00	-- 4.34%	294,821.25 297,461.68	99.49 3.81%	301,448.03 931.73	0.05% 3,986.36	Aaa/AA+ AA+	3.07 2.78
3137H5YC5	FHMS K-748 A2 2.26 01/25/2029	500,000.00	08/26/2024 4.07%	464,140.62 475,219.50	95.51 3.84%	477,557.50 941.67	0.07% 2,338.00	Aa1/AA+ AAA	3.07 2.83
3137FLMV3	FHMS K-090 A2 3.422 02/25/2029	200,000.00	07/29/2024 4.46%	191,414.06 194,124.86	98.66 3.83%	197,325.00 570.33	0.03% 3,200.14	Aa1/AAA AA+	3.15 2.88
3137FLN91	FHMS K-091 A2 3.505 03/25/2029	486,000.00	01/14/2025 4.85%	461,889.84 467,484.55	98.88 3.84%	480,573.81 1,419.53	0.07% 13,089.26	Aa1/AAA AA+	3.23 2.90
3137FLYV0	FHMS K-092 A2 3.298 04/25/2029	500,000.00	08/07/2024 4.20%	480,722.66 486,495.61	98.20 3.85%	490,989.00 1,374.17	0.08% 4,493.39	Aa1/AA+ AAA	3.31 3.02
3137FMCR1	FHMS K-093 A2 2.982 05/25/2029	542,268.53	12/19/2024 4.70%	506,660.98 515,019.45	97.33 3.84%	527,778.57 1,347.54	0.08% 12,759.12	Aa1/AA+ AAA	3.40 2.98

San Diego Community Power ConsAgg | Account #11452 | As of December 31, 2025

Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
3137FNAE0	FHMS K-095 A2 2.785 06/25/2029	200,000.00	07/17/2024 4.47%	185,398.44 189,764.95	96.49 3.87%	192,989.00 464.17	0.03% 3,224.05	Aa1/AA+ AAA	3.48 3.15
3137FNX54	FHMS K-097 A2 2.508 07/25/2029	425,000.00	12/19/2024 4.70%	386,982.42 395,576.70	95.40 3.89%	405,440.65 888.25	0.06% 9,863.95	Aaa/AA+ AA+	3.56 3.32
3137H9D71	FHMS K-750 A2 3.0 09/25/2029	600,000.00	11/05/2024 4.55%	562,218.75 571,223.50	97.17 3.88%	582,994.20 1,500.00	0.09% 11,770.70	Aa1/AA+ AAA	3.73 3.11
3137FQ3Z4	FHMS K-101 A2 2.524 10/25/2029	495,000.00	12/20/2024 4.69%	449,560.55 459,249.08	95.10 3.92%	470,734.61 1,041.15	0.07% 11,485.53	Aa1/AA+ AA+	3.82 3.51
3137FQKC6	FHMS K-102 A2 2.537 10/25/2029	750,000.00	09/03/2025 3.94%	710,537.11 713,595.22	95.19 3.91%	713,921.25 1,585.63	0.11% 326.03	Aa1/AA+ AAA	3.82 3.48
3137FQKN2	FHMS K-103 A2 2.651 11/25/2029	453,000.00	12/20/2024 4.69%	413,344.81 421,652.02	95.40 3.93%	432,177.40 1,000.75	0.07% 10,525.38	Aa1/AA+ AAA	3.90 3.56
3137FRUT6	FHMS K-106 A2 2.069 01/25/2030	750,000.00	06/17/2025 4.27%	682,089.84 689,977.77	92.97 3.95%	697,291.50 1,293.13	0.11% 7,313.73	Aa1/AA+ AAA	4.07 3.79
3137HA4B9	FHMS K-751 A2 4.412 03/25/2030	600,000.00	03/24/2025 4.40%	599,578.13 599,643.75	101.42 3.97%	608,494.80 2,206.00	0.09% 8,851.05	Aaa/AA+ AA+	4.23 3.50
3137FWG79	FHMS K-115 A2 1.383 06/25/2030	344,000.00	06/23/2025 4.23%	300,547.97 305,107.90	89.45 3.99%	307,694.58 396.46	0.05% 2,586.68	Aa1/AA+ AAA	4.48 4.21
3137F62M8	FHMS K-118 A2 1.493 09/25/2030	500,000.00	11/14/2025 4.02%	445,488.28 446,830.01	89.28 4.03%	446,414.00 622.08	0.07% (416.01)	Aa1/AA+ AAA	4.73 4.40
3137F72P9	FHMS K-120 A2 1.5 10/25/2030	600,000.00	12/15/2025 3.98%	535,054.69 535,574.85	88.99 4.04%	533,968.20 750.00	0.08% (1,606.65)	Aa1/AA+ AAA	4.82 4.52
Total Agency CMBS		**10,944,262.36**	**4.34%**	**10,326,235.03** **10,431,728.79**	**96.68** **3.88%**	**10,565,641.72** **27,078.42**	**1.62%** **133,912.94**		**3.56** **3.22**
CASH									
90RCBB$02	RCB Operating x7892	50,978,966.65	-- 0.00%	50,978,966.65 50,978,966.65	1.00 0.00%	50,978,966.65 0.00	7.84% 0.00	NA/NA NA	0.00 0.00
90JPMC$10	Chase Checking x9617	45,239,844.91	-- 1.43%	45,239,844.91 45,239,844.91	1.00 1.43%	45,239,844.91 0.00	6.96% 0.00	NA/NA NA	0.00 0.00
90RCBB$01	RCB Lock Box x0584	12,638,807.95	-- 0.00%	12,638,807.95 12,638,807.95	1.00 0.00%	12,638,807.95 0.00	1.94% 0.00	NA/NA NA	0.00 0.00

HOLDINGS REPORT

CHANDLER ASSET MANAGEMENT

San Diego Community Power ConsAgg | Account #11452 | As of December 31, 2025

Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
CCYUSD	Receivable	866.84	--	866.84 866.84	1.00	866.84 0.00	0.00% 0.00	Aaa/AAA AAA	0.00 0.00
Total Cash		**108,858,486.35**	**0.59%**	**108,858,486.35** **108,858,486.35**	**1.00** **0.59%**	**108,858,486.35** **0.00**	**16.74%** **0.00**		**0.00** **0.00**
COLLATERALIZED BANK DEPOSIT									
90RCBB$03	RCB MMKT	262,395,842.58	-- 4.20%	262,395,842.58 262,395,842.58	1.00 4.20%	262,395,842.58 0.00	40.35% 0.00	NA/NA NA	0.00 0.00
Total Collateralized Bank Deposit		**262,395,842.58**	**4.20%**	**262,395,842.58** **262,395,842.58**	**1.00** **4.20%**	**262,395,842.58** **0.00**	**40.35%** **0.00**		**0.00** **0.00**
CORPORATE									
89115A3A8	TORONTO-DOMINION BANK 4.568 12/17/2026	300,000.00	01/22/2025 4.70%	299,301.00 299,646.97	100.62 3.90%	301,853.10 532.93	0.05% 2,206.13	A2/A- AA-	0.96 0.93
438516CX2	HONEYWELL INTERNATIONAL INC 4.65 07/30/2027	300,000.00	-- 4.47%	301,425.00 300,735.49	101.28 3.80%	303,847.80 5,851.25	0.05% 3,112.31	A2/A A	1.58 1.41
69371RT30	PACCAR FINANCIAL CORP 4.45 08/06/2027	255,000.00	08/01/2024 4.50%	254,660.85 254,819.74	101.15 3.70%	257,944.74 4,570.52	0.04% 3,125.00	A1/A+ NA	1.60 1.50
06368L8K5	BANK OF MONTREAL 4.567 09/10/2027	500,000.00	-- 4.47%	500,817.50 500,219.62	100.37 4.36%	501,870.50 7,040.79	0.08% 1,650.88	A2/A- AA-	1.69 0.66
14913UAR1	CATERPILLAR FINANCIAL SERVICES CORP 4.4 10/15/2027	300,000.00	08/13/2024 4.29%	301,020.00 300,575.79	101.19 3.70%	303,560.70 2,786.67	0.05% 2,984.91	A2/A A+	1.79 1.69
24422EXZ7	JOHN DEERE CAPITAL CORP 4.65 01/07/2028	425,000.00	01/06/2025 4.66%	424,872.50 424,914.14	101.72 3.75%	432,310.85 9,551.88	0.07% 7,396.71	A1/A A+	2.02 1.87
89236TKQ7	TOYOTA MOTOR CREDIT CORP 4.625 01/12/2028	150,000.00	07/18/2024 4.65%	149,856.00 149,916.11	101.56 3.82%	152,334.45 3,256.77	0.02% 2,418.34	A1/A+ A+	2.03 1.88
95000U3R2	WELLS FARGO & CO 4.9 01/24/2028	500,000.00	01/16/2025 4.90%	500,000.00 500,000.00	100.84 4.29%	504,209.00 10,684.72	0.08% 4,209.00	A1/BBB+ A+	2.07 1.01
89115A3E0	TORONTO-DOMINION BANK 4.861 01/31/2028	335,000.00	01/28/2025 4.86%	335,000.00 335,000.00	101.64 4.03%	340,486.30 6,830.38	0.05% 5,486.30	A2/A- AA-	2.08 1.92
857477CU5	STATE STREET CORP 4.536 02/28/2028	625,000.00	02/25/2025 4.51%	625,000.00 625,000.00	101.53 3.79%	634,585.63 9,686.25	0.10% 9,585.63	Aa3/A AA-	2.16 1.94

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Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
74460WAD9	PUBLIC STORAGE OPERATING CO 1.85 05/01/2028	300,000.00	-- 4.61%	271,762.50 282,451.10	95.41 3.93%	286,220.10 925.00	0.04% 3,769.00	A2/A NA	2.33 2.24
64952WFD0	NEW YORK LIFE GLOBAL FUNDING 4.9 06/13/2028	750,000.00	07/30/2025 4.24%	763,215.00 761,273.10	102.24 3.93%	766,776.75 1,837.50	0.12% 5,503.65	Aa1/AA+ AAA	2.45 2.29
87612EBU9	TARGET CORP 4.35 06/15/2028	230,000.00	06/05/2025 4.35%	229,997.70 229,998.13	101.17 3.85%	232,689.85 444.67	0.04% 2,691.72	A2/A A	2.46 2.23
06406RBX4	BANK OF NEW YORK MELLON CORP 4.89 07/21/2028	500,000.00	-- 4.67%	502,804.00 501,547.91	101.55 4.13%	507,756.00 10,866.67	0.08% 6,208.09	Aa3/A AA-	2.56 1.46
46647PEL6	JPMORGAN CHASE & CO 4.979 07/22/2028	300,000.00	-- 4.80%	301,428.00 300,749.53	101.49 4.24%	304,468.80 6,597.18	0.05% 3,719.27	A1/A AA-	2.56 1.46
06051GKW8	BANK OF AMERICA CORP 4.948 07/22/2028	300,000.00	-- 4.88%	300,574.50 300,302.92	101.42 4.67%	304,247.70 6,556.10	0.05% 3,944.78	A1/A- AA-	2.56 1.46
61744YAK4	MORGAN STANLEY 3.591 07/22/2028	300,000.00	-- 4.66%	288,472.50 292,603.94	99.32 3.88%	297,947.40 4,758.08	0.05% 5,343.46	A1/A- A+	2.56 1.47
40139LBM4	GUARDIAN LIFE GLOBAL FUNDING 4.066 09/05/2028	750,000.00	09/03/2025 3.98%	751,785.00 751,592.82	100.02 4.05%	750,177.75 9,826.17	0.12% (1,415.07)	Aa1/AA+ NA	2.68 2.48
756109BS2	REALTY INCOME CORP 4.7 12/15/2028	750,000.00	-- 4.59%	752,505.50 752,062.22	101.93 4.00%	764,450.25 1,566.67	0.12% 12,388.03	A3/A- NA	2.96 2.66
61690DK72	MORGAN STANLEY BANK NA 5.016 01/12/2029	300,000.00	01/16/2025 4.99%	300,258.00 300,176.04	101.84 4.25%	305,515.20 7,064.20	0.05% 5,339.16	Aa3/A+ AA-	3.03 1.87
91324PEU2	UNITEDHEALTH GROUP INC 4.25 01/15/2029	300,000.00	-- 4.42%	297,930.00 298,600.73	100.74 3.99%	302,213.10 5,879.17	0.05% 3,612.37	A2/A+ A	3.04 2.70
78017DAA6	ROYAL BANK OF CANADA 4.965 01/24/2029	450,000.00	01/21/2025 5.46%	450,000.00 450,000.00	101.85 4.19%	458,336.25 9,743.81	0.07% 8,336.25	A1/A AA-	3.07 1.91
69371RS80	PACCAR FINANCIAL CORP 4.6 01/31/2029	150,000.00	07/18/2024 4.64%	149,755.50 149,833.85	101.84 3.96%	152,753.40 2,894.17	0.02% 2,919.55	A1/A+ NA	3.08 2.80
74340XBL4	PROLOGIS LP 4.375 02/01/2029	300,000.00	-- 4.55%	297,844.50 298,531.69	100.96 4.04%	302,867.10 5,468.75	0.05% 4,335.41	A2/A NA	3.09 2.59
61747YFD2	MORGAN STANLEY 5.164 04/20/2029	300,000.00	11/07/2024 4.78%	303,570.00 302,381.89	102.25 4.47%	306,753.00 3,055.37	0.05% 4,371.11	A1/A- A+	3.30 2.13
025816ED7	AMERICAN EXPRESS CO 4.731 04/25/2029	750,000.00	-- 4.64%	751,898.75 751,508.56	101.53 4.31%	761,507.25 6,505.13	0.12% 9,998.69	A2/A- A	3.31 2.16
437076DC3	HOME DEPOT INC 4.75 06/25/2029	750,000.00	-- 4.41%	759,603.00 757,773.68	102.52 3.97%	768,933.00 593.75	0.12% 11,159.32	A2/A A	3.48 3.12

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713448FX1	PEPSICO INC 4.5 07/17/2029	300,000.00	-- 4.24%	303,396.00 302,424.77	101.96 3.90%	305,872.80 6,150.00	0.05% 3,448.03	A1/A+ NA	3.54 3.12
06051GHM4	BANK OF AMERICA CORP 4.271 07/23/2029	600,000.00	-- 4.73%	591,312.00 593,538.30	100.46 4.39%	602,749.80 11,246.97	0.09% 9,211.50	A1/A- AA-	3.56 2.36
46647PAV8	JPMORGAN CHASE & CO 4.203 07/23/2029	300,000.00	11/07/2024 4.77%	294,291.00 296,058.98	100.32 4.37%	300,972.90 5,533.95	0.05% 4,913.92	A1/A AA-	3.56 2.36
89236TMK8	TOYOTA MOTOR CREDIT CORP 4.55 08/09/2029	250,000.00	08/07/2024 4.57%	249,790.00 249,848.65	101.62 4.06%	254,059.50 4,486.81	0.04% 4,210.85	A1/A+ A+	3.61 3.24
532457CQ9	ELI LILLY AND CO 4.2 08/14/2029	300,000.00	-- 4.19%	300,181.75 300,129.01	100.97 3.91%	302,907.60 4,795.00	0.05% 2,778.59	Aa3/A+ NA	3.62 3.21
171239AL0	CHUBB INA HOLDINGS LLC 4.65 08/15/2029	400,000.00	-- 4.53%	401,978.29 401,457.20	102.21 3.99%	408,836.40 7,026.67	0.06% 7,379.20	A2/A A	3.62 3.19
30303M8S4	META PLATFORMS INC 4.3 08/15/2029	300,000.00	-- 4.28%	300,268.23 300,191.51	101.20 3.94%	303,614.40 4,873.33	0.05% 3,422.89	Aa3/AA- NA	3.62 3.20
02665WFQ9	AMERICAN HONDA FINANCE CORP 4.4 09/05/2029	250,000.00	10/02/2024 4.29%	251,157.50 250,864.58	101.01 4.10%	252,524.25 3,544.44	0.04% 1,659.67	A3/A- NA	3.68 3.32
38141GD27	GOLDMAN SACHS GROUP INC 4.153 10/21/2029	970,000.00	-- 4.25%	970,195.00 970,182.69	99.98 4.27%	969,782.72 7,833.02	0.15% (399.97)	A2/BBB+ A	3.80 2.60
14913UAU4	CATERPILLAR FINANCIAL SERVICES CORP 4.7 11/15/2029	300,000.00	11/14/2024 4.74%	299,523.00 299,630.63	102.60 3.97%	307,793.10 1,801.67	0.05% 8,162.47	A2/A A+	3.87 3.50
00287YBX6	ABBVIE INC 3.2 11/21/2029	750,000.00	10/23/2025 3.99%	727,957.50 728,978.95	96.98 4.05%	727,332.00 2,666.67	0.11% (1,646.95)	A3/A- NA	3.89 3.60
89236TNA9	TOYOTA MOTOR CREDIT CORP 4.95 01/09/2030	430,000.00	01/06/2025 5.00%	429,079.80 429,259.71	102.97 4.14%	442,755.95 10,169.50	0.07% 13,496.24	A1/A+ A+	4.02 3.54
46647PEB8	JPMORGAN CHASE & CO 5.012 01/23/2030	250,000.00	01/21/2025 5.02%	249,937.50 249,952.17	102.47 4.35%	256,175.00 5,499.28	0.04% 6,222.83	A1/A AA-	4.06 2.76
95000U3J0	WELLS FARGO & CO 5.198 01/23/2030	400,000.00	01/22/2025 5.13%	400,988.00 400,756.05	102.99 4.40%	411,940.00 9,125.38	0.06% 11,183.95	A1/BBB+ A+	4.06 2.75
02665WFY2	AMERICAN HONDA FINANCE CORP 4.8 03/05/2030	425,000.00	03/03/2025 4.82%	424,626.00 424,687.86	102.17 4.23%	434,235.68 6,573.33	0.07% 9,547.82	A3/A- NA	4.18 3.70
571748CA8	MARSH & MCLENNAN COMPANIES INC 4.65 03/15/2030	750,000.00	-- 4.66%	749,787.00 749,834.93	102.00 4.12%	765,035.25 10,268.75	0.12% 15,200.32	A3/A- A-	4.20 3.67
59217GEG0	METROPOLITAN LIFE GLOBAL FUNDING I 2.95 04/09/2030	750,000.00	09/03/2025 4.27%	709,170.00 712,065.57	94.86 4.28%	711,436.50 5,039.58	0.11% (629.07)	Aa3/AA- AA-	4.27 3.92

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57629TBX4	MASSMUTUAL GLOBAL FUNDING II 4.55 05/07/2030	750,000.00	07/30/2025 4.51%	751,192.50 751,087.02	100.94 4.31%	757,044.00 5,118.75	0.12% 5,956.98	Aa3/AA+ AA+	4.35 3.89
69371RT71	PACCAR FINANCIAL CORP 4.55 05/08/2030	680,000.00	05/05/2025 4.59%	678,946.00 679,083.38	101.85 4.08%	692,558.92 4,555.06	0.11% 13,475.54	A1/A+ NA	4.35 3.89
747525BU6	QUALCOMM INC 4.5 05/20/2030	750,000.00	06/17/2025 4.45%	751,582.50 751,406.07	101.65 4.08%	762,384.00 3,843.75	0.12% 10,977.93	A2/A NA	4.38 3.86
74153WCW7	PRICOA GLOBAL FUNDING I 4.7 05/28/2030	750,000.00	07/30/2025 4.55%	754,680.00 754,270.96	101.76 4.26%	763,227.00 3,231.25	0.12% 8,956.04	Aa3/AA- AA-	4.41 3.93
74464AAC5	PUBLIC STORAGE OPERATING CO 4.375 07/01/2030	500,000.00	07/01/2025 4.44%	498,665.00 498,798.87	100.82 4.17%	504,080.50 10,998.26	0.08% 5,281.63	A2/A NA	4.50 3.98
828807DK0	SIMON PROPERTY GROUP LP 2.65 07/15/2030	750,000.00	07/30/2025 4.46%	690,165.00 695,255.93	93.64 4.21%	702,277.50 9,164.58	0.11% 7,021.57	A3/A NA	4.54 4.15
713448GH5	PEPSICO INC 4.3 07/23/2030	500,000.00	07/30/2025 4.36%	498,710.00 498,819.27	101.03 4.05%	505,151.00 9,436.11	0.08% 6,331.73	A1/A+ NA	4.56 3.96
437076DJ8	HOME DEPOT INC 3.95 09/15/2030	685,000.00	09/08/2025 4.03%	682,540.85 682,686.30	99.77 4.00%	683,420.39 7,966.93	0.11% 734.09	A2/A A	4.71 4.20
40139LBN2	GUARDIAN LIFE GLOBAL FUNDING 4.327 10/06/2030	750,000.00	09/30/2025 4.33%	750,000.00 750,000.00	100.18 4.28%	751,376.25 7,662.40	0.12% 1,376.25	Aa1/AA+ NA	4.76 4.22
24422EYF0	JOHN DEERE CAPITAL CORP 4.375 10/15/2030	1,000,000.00	11/04/2025 4.22%	1,006,920.00 1,006,701.47	101.05 4.13%	1,010,534.00 9,236.11	0.16% 3,832.53	A1/A A+	4.79 4.25
141781CF9	CARGILL INC 4.125 10/23/2030	750,000.00	-- 4.14%	749,433.50 749,455.12	99.57 4.22%	746,750.25 5,843.75	0.11% (2,704.87)	A2/A NA	4.81 4.29
717081FD0	PFIZER INC 4.2 11/15/2030	700,000.00	12/08/2025 4.18%	700,518.00 700,511.27	100.46 4.09%	703,242.40 3,266.67	0.11% 2,731.13	A2/A NA	4.87 4.28
Total Corporate		**27,460,000.00**	**4.49%**	**27,332,349.22 27,350,153.20**	**100.72 4.12%**	**27,646,686.02 332,332.47**	**4.25% 296,532.82**		**3.55 2.98**
LAIF									
90LAIF$00	Local Agency Investment Fund State Pool	100,000.00	12/31/2025 3.98%	100,000.00 100,000.00	1.00 3.98%	100,000.00 0.00	0.02% 0.00	NA/NA NA	0.00 0.00
Total LAIF		**100,000.00**	**3.98%**	**100,000.00 100,000.00**	**1.00 3.98%**	**100,000.00 0.00**	**0.02% 0.00**		**0.00 0.00**

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MONEY MARKET FUND									
31846V203	FIRST AMER:GVT OBLG Y	396,885.60	-- 3.38%	396,885.60 396,885.60	1.00 3.38%	396,885.60 0.00	0.06% 0.00	Aaa/AAAm AAA	0.00 0.00
Total Money Market Fund		**396,885.60**	**3.38%**	**396,885.60** **396,885.60**	**1.00** **3.38%**	**396,885.60** **0.00**	**0.06%** **0.00**		**0.00** **0.00**
MUNICIPAL BONDS									
13063EGT7	CALIFORNIA STATE 4.5 08/01/2029	400,000.00	11/05/2024 4.38%	402,056.00 401,557.18	102.47 3.76%	409,880.00 7,500.00	0.06% 8,322.82	Aa2/AA- AA	3.58 3.23
13063DRE0	CALIFORNIA ST 2.5 10/01/2029	500,000.00	03/24/2025 4.33%	462,780.00 469,137.38	95.59 3.77%	477,950.50 3,125.00	0.07% 8,813.12	Aa2/AA- AA	3.75 3.51
Total Municipal Bonds		**900,000.00**	**4.35%**	**864,836.00** **870,694.56**	**98.77** **3.76%**	**887,830.50** **10,625.00**	**0.14%** **17,135.94**		**3.67** **3.38**
PLACEMENT SERVICE DEPOSIT									
90RCBB$04	RCB ICS	175,242,523.11	-- 4.25%	175,242,523.11 175,242,523.11	1.00 4.25%	175,242,523.11 0.00	26.95% 0.00	NA/NA NA	0.00 0.00
Total Placement Service Deposit		**175,242,523.11**	**4.25%**	**175,242,523.11** **175,242,523.11**	**1.00** **4.25%**	**175,242,523.11** **0.00**	**26.95%** **0.00**		**0.00** **0.00**
SUPRANATIONAL									
459058LY7	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 3.5 10/28/2030	1,000,000.00	10/28/2025 3.68%	991,720.00 992,010.37	98.81 3.77%	988,097.00 6,125.00	0.15% (3,913.37)	Aaa/AAA NA	4.82 4.37
Total Supranational		**1,000,000.00**	**3.68%**	**991,720.00** **992,010.37**	**98.81** **3.77%**	**988,097.00** **6,125.00**	**0.15%** **(3,913.37)**		**4.82** **4.37**
US TREASURY									
912797SJ7	UNITED STATES TREASURY 02/03/2026	500,000.00	11/14/2025 3.86%	495,906.35 498,268.07	99.69 3.57%	498,438.50 0.00	0.08% 170.43	P-1/A-1+ F1+	0.09 0.09

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912797ST5	UNITED STATES TREASURY 03/03/2026	500,000.00	11/14/2025 3.87%	494,442.36 496,801.74	99.41 3.62%	497,038.50 0.00	0.08% 236.76	P-1/A-1+ F1+	0.17 0.16
91282CKY6	UNITED STATES TREASURY 4.625 06/30/2026	250,000.00	-- 4.22%	251,818.36 250,471.46	100.52 3.56%	251,297.25 31.94	0.04% 825.79	Aa1/AA+ AA+	0.50 0.49
91282CHU8	UNITED STATES TREASURY 4.375 08/15/2026	500,000.00	-- 4.21%	501,574.22 500,488.42	100.47 3.59%	502,366.50 8,262.57	0.08% 1,878.08	Aa1/AA+ AA+	0.62 0.60
91282CHY0	UNITED STATES TREASURY 4.625 09/15/2026	500,000.00	-- 4.23%	503,902.35 501,313.30	100.73 3.55%	503,651.50 6,899.17	0.08% 2,338.20	Aa1/AA+ AA+	0.71 0.68
91282CLS8	UNITED STATES TREASURY 4.125 10/31/2026	1,000,000.00	11/12/2024 4.34%	995,937.50 998,283.21	100.43 3.59%	1,004,272.00 7,064.92	0.15% 5,988.79	Aa1/AA+ AA+	0.83 0.80
91282CJP7	UNITED STATES TREASURY 4.375 12/15/2026	1,000,000.00	-- 4.17%	1,004,296.88 1,001,815.08	100.78 3.53%	1,007,844.00 2,043.27	0.15% 6,028.92	Aa1/AA+ AA+	0.96 0.92
91282CME8	UNITED STATES TREASURY 4.25 12/31/2026	1,000,000.00	01/07/2025 4.30%	999,101.56 999,547.05	100.70 3.53%	1,006,976.00 117.40	0.15% 7,428.95	Aa1/AA+ AA+	1.00 0.97
91282CMH1	UNITED STATES TREASURY 4.125 01/31/2027	1,000,000.00	01/28/2025 4.21%	998,476.56 999,175.67	100.62 3.53%	1,006,211.00 17,262.23	0.15% 7,035.33	Aa1/AA+ AA+	1.08 1.03
91282CKA8	UNITED STATES TREASURY 4.125 02/15/2027	500,000.00	-- 4.10%	500,269.54 500,126.81	100.66 3.52%	503,281.50 7,790.42	0.08% 3,154.69	Aa1/AA+ AA+	1.13 1.07
91282CMP3	UNITED STATES TREASURY 4.125 02/28/2027	1,500,000.00	08/14/2025 3.81%	1,507,031.25 1,505,292.20	100.67 3.52%	1,510,078.50 21,023.83	0.23% 4,786.30	Aa1/AA+ AA+	1.16 1.11
91282CKE0	UNITED STATES TREASURY 4.25 03/15/2027	1,200,000.00	-- 3.85%	1,209,515.63 1,205,495.53	100.85 3.52%	1,210,172.40 15,215.47	0.19% 4,676.87	Aa1/AA+ AA+	1.20 1.15
91282CEN7	UNITED STATES TREASURY 2.75 04/30/2027	500,000.00	09/11/2024 3.52%	490,390.63 495,155.28	99.03 3.50%	495,156.50 2,354.97	0.08% 1.22	Aa1/AA+ AA+	1.33 1.28
91282CET4	UNITED STATES TREASURY 2.625 05/31/2027	1,000,000.00	-- 3.74%	976,054.69 985,018.66	98.80 3.50%	988,047.00 2,307.69	0.15% 3,028.34	Aa1/AA+ AA+	1.41 1.37
91282CEW7	UNITED STATES TREASURY 3.25 06/30/2027	1,200,000.00	03/27/2025 3.99%	1,180,828.13 1,187,319.58	99.66 3.49%	1,195,875.60 107.73	0.18% 8,556.02	Aa1/AA+ AA+	1.50 1.45
91282CKZ3	UNITED STATES TREASURY 4.375 07/15/2027	500,000.00	-- 3.94%	505,843.75 503,093.85	101.33 3.48%	506,640.50 10,105.30	0.08% 3,546.65	Aa1/AA+ AA+	1.54 1.45
91282CNP2	UNITED STATES TREASURY 3.875 07/31/2027	1,000,000.00	07/30/2025 3.92%	999,101.56 999,291.09	100.58 3.49%	1,005,820.00 16,216.03	0.15% 6,528.91	Aa1/AA+ AA+	1.58 1.50
91282CLG4	UNITED STATES TREASURY 3.75 08/15/2027	2,000,000.00	06/23/2025 3.81%	1,997,343.75 1,997,992.53	100.41 3.48%	2,008,282.00 28,328.80	0.31% 10,289.47	Aa1/AA+ AA+	1.62 1.54

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Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
91282CFM8	UNITED STATES TREASURY 4.125 09/30/2027	1,200,000.00	03/27/2025 4.00%	1,203,656.25 1,202,542.61	101.07 3.48%	1,212,843.60 12,646.98	0.19% 10,300.99	Aa1/AA+ AA+	1.75 1.65
91282CLQ2	UNITED STATES TREASURY 3.875 10/15/2027	1,000,000.00	11/12/2024 4.31%	988,164.06 992,760.76	100.67 3.48%	1,006,680.00 8,303.57	0.15% 13,919.24	Aa1/AA+ AA+	1.79 1.70
91282CPE5	UNITED STATES TREASURY 3.5 10/31/2027	1,000,000.00	11/13/2025 3.60%	998,203.13 998,323.59	100.02 3.48%	1,000,234.00 5,994.48	0.15% 1,910.41	Aa1/AA+ AA+	1.83 1.74
91282CLX7	UNITED STATES TREASURY 4.125 11/15/2027	1,000,000.00	11/06/2024 4.25%	996,484.38 997,807.15	101.14 3.49%	1,011,406.00 5,355.66	0.16% 13,598.85	Aa1/AA+ AA+	1.87 1.78
91282CGC9	UNITED STATES TREASURY 3.875 12/31/2027	1,000,000.00	-- 4.11%	993,000.01 995,677.85	100.75 3.48%	1,007,461.00 107.04	0.15% 11,783.15	Aa1/AA+ AA+	2.00 1.91
91282CMF5	UNITED STATES TREASURY 4.25 01/15/2028	1,000,000.00	01/07/2025 4.37%	996,718.75 997,770.55	101.47 3.49%	1,014,727.00 19,633.15	0.16% 16,956.45	Aa1/AA+ AA+	2.04 1.90
91282CGP0	UNITED STATES TREASURY 4.0 02/29/2028	1,000,000.00	12/30/2024 4.31%	990,820.31 993,729.20	101.04 3.49%	1,010,430.00 13,591.16	0.16% 16,700.80	Aa1/AA+ AA+	2.16 2.03
91282CGT2	UNITED STATES TREASURY 3.625 03/31/2028	1,200,000.00	-- 3.84%	1,191,730.48 1,194,679.24	100.27 3.50%	1,203,187.20 11,114.01	0.19% 8,507.96	Aa1/AA+ AA+	2.25 2.12
91282CHA2	UNITED STATES TREASURY 3.5 04/30/2028	1,000,000.00	-- 3.71%	994,277.34 995,354.10	99.98 3.51%	999,844.00 5,994.48	0.15% 4,489.90	Aa1/AA+ AA+	2.33 2.20
91282CHE4	UNITED STATES TREASURY 3.625 05/31/2028	1,000,000.00	03/27/2025 4.03%	988,085.94 990,951.48	100.26 3.51%	1,002,617.00 3,186.81	0.15% 11,665.52	Aa1/AA+ AA+	2.42 2.28
91282CHK0	UNITED STATES TREASURY 4.0 06/30/2028	500,000.00	-- 3.96%	500,628.91 500,411.59	101.17 3.51%	505,859.50 55.25	0.08% 5,447.91	Aa1/AA+ AA+	2.50 2.36
91282CHQ7	UNITED STATES TREASURY 4.125 07/31/2028	2,000,000.00	06/23/2025 3.80%	2,018,984.38 2,015,784.01	101.49 3.51%	2,029,844.00 34,524.46	0.31% 14,059.99	Aa1/AA+ AA+	2.58 2.39
91282CNU1	UNITED STATES TREASURY 3.625 08/15/2028	1,500,000.00	08/14/2025 3.70%	1,496,777.34 1,497,186.05	100.25 3.52%	1,503,808.50 20,538.38	0.23% 6,622.45	Aa1/AA+ AA+	2.62 2.45
91282CJA0	UNITED STATES TREASURY 4.625 09/30/2028	500,000.00	-- 3.90%	513,722.66 509,161.95	102.83 3.53%	514,140.50 5,908.31	0.08% 4,978.55	Aa1/AA+ AA+	2.75 2.54
91282CPC9	UNITED STATES TREASURY 3.5 10/15/2028	1,000,000.00	11/13/2025 3.60%	997,343.75 997,463.36	99.90 3.54%	998,984.00 7,500.00	0.15% 1,520.64	Aa1/AA+ AA+	2.79 2.61
9128285M8	UNITED STATES TREASURY 3.125 11/15/2028	2,000,000.00	09/03/2025 3.60%	1,971,406.25 1,974,319.48	98.88 3.54%	1,977,656.00 8,114.64	0.30% 3,336.52	Aa1/AA+ AA+	2.88 2.71
91282CJR3	UNITED STATES TREASURY 3.75 12/31/2028	1,000,000.00	-- 4.11%	986,164.07 990,209.59	100.57 3.55%	1,005,664.00 103.59	0.15% 15,454.41	Aa1/AA+ AA+	3.00 2.81

HOLDINGS REPORT

CHANDLER ASSET MANAGEMENT

San Diego Community Power ConsAgg | Account #11452 | As of December 31, 2025

Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
91282CJW2	UNITED STATES TREASURY 4.0 01/31/2029	1,000,000.00	01/28/2025 4.32%	988,281.25 990,980.65	101.27 3.56%	1,012,734.00 16,739.13	0.16% 21,753.35	Aa1/AA+ AA+	3.08 2.83
91282CKG5	UNITED STATES TREASURY 4.125 03/31/2029	500,000.00	-- 3.87%	505,238.28 503,709.25	101.66 3.58%	508,281.50 5,269.57	0.08% 4,572.25	Aa1/AA+ AA+	3.25 2.99
91282CKX8	UNITED STATES TREASURY 4.25 06/30/2029	1,000,000.00	-- 3.90%	1,014,421.88 1,011,140.22	102.11 3.60%	1,021,133.00 117.40	0.16% 9,992.78	Aa1/AA+ AA+	3.50 3.23
91282CLK5	UNITED STATES TREASURY 3.625 08/31/2029	1,000,000.00	-- 3.84%	990,937.50 993,017.58	99.98 3.63%	999,844.00 12,316.99	0.15% 6,826.42	Aa1/AA+ AA+	3.67 3.36
91282CLN9	UNITED STATES TREASURY 3.5 09/30/2029	2,400,000.00	09/16/2025 3.54%	2,396,250.00 2,396,519.67	99.54 3.63%	2,388,844.80 21,461.54	0.37% (7,674.87)	Aa1/AA+ AA+	3.75 3.45
91282CLR0	UNITED STATES TREASURY 4.125 10/31/2029	1,000,000.00	11/12/2024 4.32%	991,562.50 993,489.21	101.71 3.64%	1,017,109.00 7,064.92	0.16% 23,619.79	Aa1/AA+ AA+	3.83 3.49
91282CMA6	UNITED STATES TREASURY 4.125 11/30/2029	1,000,000.00	01/23/2025 4.46%	985,664.07 988,432.50	101.73 3.65%	1,017,266.00 3,626.37	0.16% 28,833.50	Aa1/AA+ AA+	3.91 3.58
91282CMD0	UNITED STATES TREASURY 4.375 12/31/2029	1,000,000.00	01/10/2025 4.53%	993,242.19 994,557.97	102.67 3.65%	1,026,719.00 120.86	0.16% 32,161.03	Aa1/AA+ AA+	4.00 3.65
91282CGQ8	UNITED STATES TREASURY 4.0 02/28/2030	1,200,000.00	04/08/2025 3.92%	1,204,031.25 1,203,428.59	101.27 3.67%	1,215,280.80 16,309.39	0.19% 11,852.21	Aa1/AA+ AA+	4.16 3.75
91282CMU2	UNITED STATES TREASURY 4.0 03/31/2030	1,500,000.00	-- 3.82%	1,512,304.69 1,510,550.01	101.27 3.67%	1,519,101.00 15,329.67	0.23% 8,550.99	Aa1/AA+ AA+	4.25 3.84
91282CNG2	UNITED STATES TREASURY 4.0 05/31/2030	1,550,000.00	-- 3.94%	1,554,279.30 1,553,801.17	101.27 3.68%	1,569,737.70 5,450.55	0.24% 15,936.53	Aa1/AA+ AA+	4.41 4.00
91282CNN7	UNITED STATES TREASURY 3.875 07/31/2030	1,200,000.00	08/14/2025 3.81%	1,203,421.88 1,203,159.24	100.74 3.70%	1,208,859.60 19,459.24	0.19% 5,700.36	Aa1/AA+ AA+	4.58 4.10
91282CNX5	UNITED STATES TREASURY 3.625 08/31/2030	2,400,000.00	09/16/2025 3.58%	2,404,500.00 2,404,236.32	99.64 3.71%	2,391,468.00 29,560.77	0.37% (12,768.32)	Aa1/AA+ AA+	4.67 4.20
91282CPD7	UNITED STATES TREASURY 3.625 10/31/2030	1,000,000.00	11/05/2025 3.76%	994,023.44 994,207.33	99.58 3.72%	995,781.00 6,208.56	0.15% 1,573.67	Aa1/AA+ AA+	4.83 4.36
Total US Treasury		**52,300,000.00**	**3.93%**	**52,176,161.31 52,210,311.79**	**100.58 3.56%**	**52,598,994.95 466,838.70**	**8.09% 388,683.16**		**2.58 2.39**
Total Portfolio		**650,130,898.98**	**3.60%**	**649,258,236.35 649,410,786.04**	**16.76 3.54%**	**650,311,448.09 874,750.54**	**100.00% 900,662.05**		**0.48 0.41**

HOLDINGS REPORT

CHANDLER ASSET MANAGEMENT

San Diego Community Power ConsAgg | Account #11452 | As of December 31, 2025

Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
Total Market Value + Accrued						**651,186,198.63**			

CHANDLER ASSET MANAGEMENT

TRANSACTIONS

TRANSACTION LEDGER

CHANDLER ASSET MANAGEMENT

San Diego Community Power ConsAgg | Account #11452|10/01/2025 Through 12/31/2025|

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/ Sold	Total Amount	Gain/Loss
ACQUISITIONS										
Purchase	10/21/2025	38141GD27	470,000.00	GOLDMAN SACHS GROUP INC 4.153 10/21/2029	100.000	4.37%	(470,000.00)	0.00	(470,000.00)	0.00
Purchase	10/23/2025	141781CF9	125,000.00	CARGILL INC 4.125 10/23/2030	99.982	4.13%	(124,977.50)	0.00	(124,977.50)	0.00
Purchase	10/23/2025	141781CF9	125,000.00	CARGILL INC 4.125 10/23/2030	99.973	4.13%	(124,966.25)	0.00	(124,966.25)	0.00
Purchase	10/23/2025	141781CF9	75,000.00	CARGILL INC 4.125 10/23/2030	99.741	4.18%	(74,805.75)	0.00	(74,805.75)	0.00
Purchase	10/23/2025	141781CF9	175,000.00	CARGILL INC 4.125 10/23/2030	99.928	4.14%	(174,874.00)	0.00	(174,874.00)	0.00
Purchase	10/24/2025	161571HZ0	1,000,000.00	CHAIT 2025-1 A 4.16 07/15/2030	101.113	3.76%	(1,011,132.81)	(1,040.00)	(1,012,172.81)	0.00
Purchase	10/24/2025	38141GD27	500,000.00	GOLDMAN SACHS GROUP INC 4.153 10/21/2029	100.039	4.14%	(500,195.00)	(173.04)	(500,368.04)	0.00
Purchase	10/24/2025	141781CF9	250,000.00	CARGILL INC 4.125 10/23/2030	99.924	4.14%	(249,810.00)	(28.65)	(249,838.65)	0.00
Purchase	10/24/2025	00287YBX6	750,000.00	ABBVIE INC 3.2 11/21/2029	97.061	3.99%	(727,957.50)	(10,200.00)	(738,157.50)	0.00
Purchase	10/29/2025	459058LY7	1,000,000.00	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 3.5 10/28/2030	99.172	3.68%	(991,720.00)	(97.22)	(991,817.22)	0.00
Purchase	10/31/2025	90RCBB$03	62,313,099.66	RCB MMKT	1.000	2.46%	(62,313,099.66)	0.00	(62,313,099.66)	0.00
Purchase	10/31/2025	90RCBB$04	559,298.52	RCB ICS	1.000	4.32%	(559,298.52)	0.00	(559,298.52)	0.00
Purchase	11/05/2025	24422EYF0	1,000,000.00	JOHN DEERE CAPITAL CORP 4.375 10/15/2030	100.692	4.22%	(1,006,920.00)	(2,430.56)	(1,009,350.56)	0.00
Purchase	11/06/2025	91282CPD7	1,000,000.00	UNITED STATES TREASURY 3.625 10/31/2030	99.402	3.76%	(994,023.44)	(600.83)	(994,624.27)	0.00
Purchase	11/14/2025	91282CPC9	1,000,000.00	UNITED STATES TREASURY 3.5 10/15/2028	99.734	3.60%	(997,343.75)	(2,884.62)	(1,000,228.37)	0.00

TRANSACTION LEDGER

CHANDLER ASSET MANAGEMENT

San Diego Community Power ConsAgg | Account #11452|10/01/2025 Through 12/31/2025|

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/ Sold	Total Amount	Gain/Loss
Purchase	11/14/2025	91282CPE5	1,000,000.00	UNITED STATES TREASURY 3.5 10/31/2027	99.820	3.60%	(998,203.13)	(1,353.59)	(999,556.72)	0.00
Purchase	11/17/2025	096912AD2	630,000.00	BMWLT 2025-1 A3 4.43 06/26/2028	100.621	3.99%	(633,912.89)	(1,705.55)	(635,618.44)	0.00
Purchase	11/17/2025	912797RA7	500,000.00	UNITED STATES TREASURY 01/02/2026	99.508	3.93%	(497,538.68)	0.00	(497,538.68)	0.00
Purchase	11/17/2025	912797SJ7	500,000.00	UNITED STATES TREASURY 02/03/2026	99.181	3.86%	(495,906.35)	0.00	(495,906.35)	0.00
Purchase	11/17/2025	912797ST5	500,000.00	UNITED STATES TREASURY 03/03/2026	98.888	3.87%	(494,442.36)	0.00	(494,442.36)	0.00
Purchase	11/19/2025	3137F62M8	500,000.00	FHMS K-118 A2 1.493 09/25/2030	89.098	4.02%	(445,488.28)	(373.25)	(445,861.53)	0.00
Purchase	11/30/2025	90RCBB$04	18,593,807.07	RCB ICS	1.000	4.31%	(18,593,807.07)	0.00	(18,593,807.07)	0.00
Purchase	12/09/2025	717081FD0	700,000.00	PFIZER INC 4.2 11/15/2030	100.074	4.18%	(700,518.00)	(1,470.00)	(701,988.00)	0.00
Purchase	12/18/2025	3137F72P9	600,000.00	FHMS K-120 A2 1.5 10/25/2030	89.176	3.98%	(535,054.69)	(425.00)	(535,479.69)	0.00
Purchase	12/31/2025	90RCBB$03	80,742,041.59	RCB MMKT	1.000	4.20%	(80,742,041.59)	0.00	(80,742,041.59)	0.00
Purchase	12/31/2025	90LAIF$00	100,000.00	Local Agency Investment Fund State Pool	1.000	3.98%	(100,000.00)	0.00	(100,000.00)	0.00
Purchase	12/31/2025	90RCBB$04	618,458.80	RCB ICS	1.000	4.25%	(618,458.80)	0.00	(618,458.80)	0.00
Total Purchase			**175,326,705.64**				**(175,176,496.02)**	**(22,782.31)**	**(175,199,278.33)**	**0.00**
TOTAL ACQUISITIONS			**175,326,705.64**				**(175,176,496.02)**	**(22,782.31)**	**(175,199,278.33)**	**0.00**
DISPOSITIONS										
Sale	10/16/2025	78016HZX1	(200,000.00)	ROYAL BANK OF CANADA 5.069 07/23/2027	100.773	4.72%	201,546.00	2,337.37	203,883.37	1,044.96
Sale	10/22/2025	78016HZX1	(300,000.00)	ROYAL BANK OF CANADA 5.069 07/23/2027	100.778	4.73%	302,334.00	3,759.51	306,093.51	1,604.68

TRANSACTION LEDGER

CHANDLER ASSET MANAGEMENT

San Diego Community Power ConsAgg | Account #11452|10/01/2025 Through 12/31/2025|

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/ Sold	Total Amount	Gain/Loss
Sale	10/22/2025	89115A3A8	(200,000.00)	TORONTO-DOMINION BANK 4.568 12/17/2026	100.740	4.70%	201,480.00	3,172.22	204,652.22	1,763.10
Sale	11/30/2025	90RCBB$03	(32,340,290.67)	RCB MMKT	1.000	4.26%	32,340,290.67	0.00	32,340,290.67	0.00
Sale	12/09/2025	09290DAH4	(300,000.00)	BLACKROCK INC 4.6 07/26/2027	101.190	4.42%	303,570.00	5,098.33	308,668.33	2,772.63
Sale	12/16/2025	912797RA7	(500,000.00)	UNITED STATES TREASURY 01/02/2026	99.830	3.93%	499,147.64	0.00	499,147.64	57.26
Total Sale			**(33,840,290.67)**				**33,848,368.31**	**14,367.43**	**33,862,735.74**	**7,242.62**
TOTAL DISPOSITIONS			**(33,840,290.67)**				**33,848,368.31**	**14,367.43**	**33,862,735.74**	**7,242.62**

IMPORTANT DISCLOSURES

CHANDLER ASSET MANAGEMENT

2025 Chandler Asset Management, Inc, An Independent Registered Investment Adviser.

Information contained herein is confidential. Prices are provided by ICE Data Services Inc ("IDS"), an independent pricing source. In the event IDS does not provide a price or if the price provided is not reflective of fair market value, Chandler will obtain pricing from an alternative approved third party pricing source in accordance with our written valuation policy and procedures. Our valuation procedures are also disclosed in Item 5 of our Form ADV Part 2A.

Performance results are presented gross-of-advisory fees and represent the client's Total Return. The deduction of advisory fees lowers performance results. These results include the reinvestment of dividends and other earnings. Past performance may not be indicative of future results. Therefore, clients should not assume that future performance of any specific investment or investment strategy will be profitable or equal to past performance levels. All investment strategies have the potential for profit or loss. Economic factors, market conditions or changes in investment strategies, contributions or withdrawals may materially alter the performance and results of your portfolio.

Index returns assume reinvestment of all distributions. Historical performance results for investment indexes generally do not reflect the deduction of transaction and/or custodial charges or the deduction of an investment management fee, the incurrence of which would have the effect of decreasing historical performance results. It is not possible to invest directly in an index.

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Fixed income investments are subject to interest, credit and market risk. Interest rate risk: the value of fixed income investments will decline as interest rates rise. Credit risk: the possibility that the borrower may not be able to repay interest and principal. Low rated bonds generally have to pay higher interest rates to attract investors willing to take on greater risk. Market risk: the bond market in general could decline due to economic conditions, especially during periods of rising interest rates.

Ratings information have been provided by Moody's, S&P and Fitch through data feeds we believe to be reliable as of the date of this statement, however we cannot guarantee its accuracy.

Security level ratings for U.S. Agency issued mortgage-backed securities ("MBS") reflect the issuer rating because the securities themselves are not rated. The issuing U.S. Agency guarantees the full and timely payment of both principal and interest.

Benchmark	Disclosure
ICE BofA 1-5 Yr Unsubordinated US Treasury & Agency Index	The ICE BofA 1-5 Year Unsubordinated US Treasury & Agency Index tracks the performance of US dollar denominated US Treasury and nonsubordinated US agency debt issued in the US domestic market. Qualifying securities must have an investment grade rating (based on an average of Moody's, S&P and Fitch). Qualifying securities must have at least one year remaining term to final maturity and less than five years remaining term to final maturity, at least 18 months to maturity at time of issuance, a fixed coupon schedule, and a minimum amount outstanding of $1 billion for sovereigns and $250 million for agencies.

SAN DIEGO COMMUNITY POWER
Staff Report - Item 3

To:	Finance and Risk Management Committee
From:	Lucas Utouh, Senior Director of Data Analytics & Customer Operations Tim Manglicmot, Director of Finance Jeb Spengler, Senior Strategic Finance Manager Aaron Lu, Rates and Strategy Manager Pete Polonsky, Senior Rates Analyst
Via:	Karin Burns, Chief Executive Officer
Subject:	Recommend Board Adoption of Resolution, Approving the Rate Stabilization Reserve Policy
Date:	March 19, 2026

Recommendation

Recommend Board Adoption of Resolution, Approving the Rate Stabilization Reserve Policy.

Background

On October 1, 2019, the Founding Members of San Diego Community Power (Community Power) adopted the Joint Powers Agreement (JPA) which was amended and restated on December 16, 2021. In the Recitals, a key purpose for establishing Community Power included the use of discretionary revenues for three reasons: (1) to support long-term financial viability, (2) to enhance customer rate stability, and (3) to provide access to innovative energy programs. Enhancing customer rate stability is a primary goal of establishing the Rate Stabilization Reserve (RSR) Policy.

Existing Policies

Community Power's Board of Directors (Board) approved the Rate Development Policy on November 17, 2022. The fourth objective and priority considered in Community Power's rate design process is Rate Stability, identifying that rate changes should be minimized to reduce customer bill impacts with a preference for annual rate adjustments. This policy also notes that a Rate Stabilization Fund may be established and funded over time to mitigate rate volatility.

Further, the Board approved the fourth revision to the Financial Reserves Policy on December 11, 2025. This revision allowed the Board to authorize the use of Reserves between the Target Reserve Balance and the Maximum Reserve Balance, which are currently set at 225- and 270-days cash on hand, respectively, to be designated as Rate Stabilization Reserves. Thus, the RSR may include up to 45 days cash on hand. Funds in the RSR shall be included in the calculation of total Reserves.

Strategic Goals

Since adoption of the FY 2026–2028 Strategic Plan, Community Power's financial scale, risk profile, and reserves framework have continued to evolve. The initial $70 million Strategic Plan target was established as an initial directional objective to begin formalizing a rate stabilization mechanism. Subsequent financial analysis completed in connection with updates to the Financial Reserves Policy has refined this objective by aligning the Rate Stabilization Reserve with a days-cash-on-hand framework that reflects Community Power's current operating scale, revenue base, and exposure to power market volatility.

Under the Board-approved Financial Reserves Policy, reserves in excess of the 225-day Target Reserve Balance—up to the 270-day Maximum Reserve Balance—may be designated for rate stabilization purposes. This framework allows for up to 45 days cash on hand, or approximately $125 million, to be allocated to the Rate Stabilization Reserve. The higher potential RSR balance does not represent a change in strategic intent, but rather a refinement that incorporates updated financial forecast data, increased exposure to market price benchmarks, and best practices observed across the CCA sector.

Rate-Setting

On January 15, 2026, the Board approved Community Power's 2026 rates, which included the largest discount ever for customers on the default PowerOn and more affordable PowerBase service options, at 4% and 10%, respectively. Staff noted that this approach would help maintain reserves and set Community Power on its path towards achieving total Reserves between 225- to 270-days cash on hand and establishing an RSR.

Analysis and Discussion

Ensuring rate stability has been a priority for Community Power since inception and is codified in the agency's Board-approved Rate Development Policy. The analysis for rates, reserves, and related financial metrics in 2026 and beyond indicates that Community Power should establish and maintain an RSR for use towards rate stability. Affordability and rate stability are major issues for Community Power's customers, and the funding of an RSR can help mitigate these issues in the long term by smoothing out rate changes. Several other Community Choice Aggregators (CCAs) have established and funded RSRs over the past decade, with many utilizing funds in their RSRs to mitigate their potential year-over-year rate increases in 2026.

Rate Stability

Affordability and rate stability continue to be major issues for California electricity customers. Two recent state reports highlight the extent of the issue. The California Public Utilities Commission (CPUC) published its 2025 Senate Bill 695 Report in September 2025, finding that SDG&E has the second-highest bundled residential average rate in the country as of 2023 and that utility rate increases have trended above inflation and are forecasted to continue to trend above inflation.[1] The Little Hoover Commission released a report in October 2025 titled, "The High Cost of Electricity in California," which highlighted that over 20% of households served by investor-owned utilities (IOUs) have unpaid energy bills, owing an average of $788 and leading to higher numbers of shutoffs.[2]

While the aforementioned electricity rate statistics include both delivery and generation rates, and Community Power only sets generation rates for its customers, Community Power's customers are exposed to rising rate pressures on both the delivery and generation components of rates. Beyond legislative and regulatory advocacy, Community Power's efforts to enhance affordability for customers include striving for competitive rates in relation to SDG&E and rate stability. Establishing an RSR would provide a key tool for rate stability, allowing Community Power to defer recognition of revenue in one fiscal year and recognize that revenue in another fiscal year.

Rate Stabilization Reserve

Many CCAs have an RSR to mitigate rate volatility. At its core, an RSR is an accounting mechanism governed by Governmental Accounting Standards Board (GASB) 62 that allows CCAs to defer recognition of revenues in strong financial years for use in weaker financial years. The trigger mechanism for determining a "strong" or "weak" financial year will consider projected impacts to net position, days cash and liquidity on hand, financial and bank covenants, and debt coverage. Staff will consider additional analysis as necessary, such as rate projections and year-over-year rate increases. The revenue that is deferred in the strong financial year does not contribute towards the Net Position of the agency for that year and instead would contribute towards the Net Position of the agency in the later year in which it is recognized. The following table provides a simple accounting example depicting how this would work in practice:

[1] See https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2025/2025-sb-695-report_093025.pdf at 2 and 25.
[2] See https://lhc.ca.gov/wp-content/uploads/LHC-Report-290-The-High-Cost-of-Electricity-in-California-Final-Draft-Prior-to-Publication-10.31.25.pdf at 3.

Table 1: Rate Stabilization Reserve Accounting Example

	Without Rate Stabilization Reserve				With Rate Stabilization Reserve			
	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2	Year 3	Year 4
Rate Discount	4%	0%	0%	4%	4%	4%	4%	4%
Revenue	$70	$56	$61	$60	$70	$50	$55	$60
RSR (Deferral) or Recognition	-	-	-	-	(12)	6	6	-
Total Revenue	70	56	61	60	58	56	61	60
Costs	50	55	60	55	50	55	60	55
Net Position	20	1	1	5	8	1	1	5
Reserves	20	21	22	27	20	15	10	15
RSR	-	-	-		12	6	-	-

In this example, the RSR is used to balance annual net revenue during a period in which costs fluctuate significantly, so that electricity rates could be set at a consistent 4% discount while maintaining a positive net position each year. If the RSR were not used, net position would otherwise be negative in Years 2 and 3, so rates would have to be set higher to achieve a positive net position, such as at parity with SDG&E (i.e., a 0% discount) in this example. Utilizing the RSR in this example allows the CCA to defer $12 in revenue from Year 1 to Years 2 and 3 so that the net position is positive in all three years without reducing the rate discount. The RSR could also be used to mitigate rate impacts from fluctuations in electricity sales or revenue, such as from market price volatility or other extraneous factors.

Regarding the timing and authorization to transfer revenues into the RSR and recognize revenues from the RSR, there are two key decisions each year. The first decision point must occur before the end of the Fiscal Year (i.e., by June) to determine whether to transfer any revenue from that Fiscal Year to the RSR. The amount transferred would continue to be classified within the total Reserves of Community Power, but the amount transferred would appear as a negative amount on Community Power's financials for the Fiscal Year. Thus, this decision must consider the fiscal impact of reducing the Net Margin for the year by the amount transferred. The RSR Policy authorizes the CEO to make this decision, which staff will report to the Board at the next regularly scheduled Board meeting.

The second decision point typically will occur during the rate-setting process, which is typically in the first month of the Calendar Year (i.e., January) when Community Power staff recommend a rate change to the Board. This decision determines whether to recognize any revenue from the RSR for a specific use case, such as mitigating a rate increase that would otherwise be necessary to meet expected costs to serve customers. The RSR Policy requires

that the CEO recommend this recognition to the Board for approval, which would typically occur during the same Board meeting at which staff recommend a rate change. Staff may recommend recognition of revenue from the RSR for an alternate use case at other times of the year, subject to Board approval.

Community Power, if necessary, may also authorize the transfer of revenues into the RSR and recognize revenues from the RSR outside of the two decision points at any time in the fiscal year subject to Board approval.

At least three CCAs have decided to utilize their RSRs to mitigate rate increases in 2026, while at least five CCAs have sufficient funds in their RSRs to utilize in 2026, should they be required for rate stability. These CCAs are in other IOU service territories (i.e., PG&E and SCE), which have lower competitive headroom for rates in 2026. Even with the RSR available, some CCAs are setting 2026 rates at a premium in comparison to their IOU to meet revenue requirements. As identified in Community Power's risk analysis, Community Power may experience a similar situation in the future, so it is fiscally prudent for the agency to establish, fund, and maintain an RSR in 2026.

Use Cases

Staff recommend the primary use case for the RSR as mitigating volatility from market price benchmarks (MPBs), which have been identified as the largest and most likely risk to rate stability. MPB fluctuation can increase the cost to serve energy, while reducing retail revenues for Community Power if rate discounts are not modified. Establishing the RSR would provide another option to mitigate the impact of MPB volatility and potential necessity of reducing rate discounts, though the RSR would not guarantee that Community Power could offer a discount in perpetuity. Staff analysis determined that the scale of this risk is approximately $420 million, comparing scenarios with historical low and high MPBs for 2026 rates. The Maximum Reserve Balance from the Financial Reserves Policy of 270-days cash on hand takes this amount into account.

While mitigating MPB volatility is the primary use case of an RSR for Community Power, there are other risks that could significantly impact expenses and/or revenues in a single year and require use of the RSR to stabilize rates, which have not been identified in the general Financial Reserves Policy. These include the following potential use cases::

- meeting debt or other financial covenants in a year of expected weak financial results,
- providing relief during extreme exogenous events (e.g., recessions, natural disasters or pandemics etc.),
- mitigating electricity bill impacts of events related to or induced by climate change (e.g., heat waves, wildfires, hurricanes, or floods),

- enhancing affordability for low- and medium-income and/or communities of concern households,
- covering unexpected cost impacts to existing customers related to serving new large loads (e.g., data centers) and/or from unexpected load departure,
- mitigating PCIA anomalies for current vintages and/or new vintages from new service territories, and
- other unexpected significant impacts to revenues or expenses.

Use of the RSR for many of these examples is less likely than use for MPB volatility and includes overlap with specified use cases for the total Reserves, identified in the Financial Reserves Policy. However, staff recommend including flexibility in the RSR Policy to allow for its use in addressing volatility in energy costs and/or retail revenue regardless of cause. This provides a more effective tool for Community Power to meet its goal of enhancing rate stability for customers.

Target RSR Balance

Consistent with the Financial Reserves Policy, an amount up to and including 45 days cash on hand is allotted as eligible for recognition from the total Reserves Balance, for the Target RSR Balance, which corresponds to approximately $125 million per analysis from the most recent revision to the Financial Reserves Policy. This amount would cover approximately 30% of the full risk of the MPB volatility discussed above and corresponds to roughly 10% of Operating Revenues or 12% of Operating Expenses, per Community Power's FY 26 adopted budget. These coverages track with general trends of RSR coverage at other CCAs.

Replenishment Mechanism

The RSR Policy also dictates that staff must incorporate a plan for replenishing the RSR if a decision to recognize revenue from the RSR is approved. This plan may be presented at the same Board meeting at which staff recommend recognition of revenue from the RSR for rate stability or another use case, or staff may present the plan at a future Board meeting as an update to the Board, given the fast-paced and urgent nature of the rate-setting process. The plan should describe what measures Community Power may take within 2-4 years to replenish the RSR, if it is deemed feasible.

Fiscal Impact

The RSR Policy meets core strategic fiscal goals of Community Power and allows the organization to transfer Reserves above the Target Reserve Balance of 225 days-cash on hand to a subset of RSR. This transfer does not negatively impact Community Power, provided that it does not reduce Community Power's Net Position below certain thresholds in a given Fiscal

Year. The ability to recognize revenues from the RSR in later fiscal years provides Community Power a powerful tool to ensure that the agency can meet fiscal goals, financial covenants, and other strategic goals without being required to rely solely on rate changes.

While the establishment of an RSR supports the goal of enhancing rate stability by offering an option to mitigate rate increase in future years, the existence of the RSR does not guarantee that Community Power can provide a rate discount in future years. Rather, Community Power staff shall continue to do its due diligence during fiscal analysis and the rate-setting process to ensure that rates are set according to the nine priorities and objectives outlined in the Rate Development Policy: sufficient cost recovery, prudent reserve build, rate competitiveness and customer value, rate stability, equity among customers, simple rate structures, transparent processes, avoidance of cost-shifting, and cost of service analysis.

The RSR is a tool that supports rate smoothing so that customers do not experience significant rate changes or volatility every year, but Community Power does not intend to rely solely on use of reserves (either in total Reserves or the subset designated as RSR) in lieu of necessary rate adjustments to cover costs. Every year, Community Power strives to offer value to its customers, including through a rate discount in comparison to SDG&E, and the RSR will be another tool in Community Power's toolkit to achieve this goal.

Strategic Plan

This supports the strategic plan goals of (1) developing an RSR to mitigate power cost fluctuations and economic downturns and (2) evolving rate strategy to ensure competitiveness, affordability, and fiscal sustainability.

Attachments

A: Resolution, Approving the Rate Stabilization Reserve Policy
    Exhibit A: Rate Stabilization Reserve Policy

ITEM 3
ATTACHMENT A

RESOLUTION NO. 2026-__

A RESOLUTION OF THE BOARD OF DIRECTORS OF SAN DIEGO COMMUNITY POWER, ADOPTING A RATE STABILIZATION RESERVE POLICY.

WHEREAS, San Diego Community Power (Community Power) is a joint powers authority formed pursuant to the Joint Exercise of Powers Act, Cal. Gov. Code § 6500 *et seq.*, California Public Utilities Code § 366.2, and a Joint Powers Agreement effective on October 1, 2019, and amended on December 16, 2021, ("JPA Agreement"); and

WHEREAS, on June 24, 2021, the Board of Directors (the "Board") approved a Financial Reserves Policy to provide a policy framework for accumulating and maintaining reserves as part of Community Power's annual budget and rate setting processes, and was subsequently amended on February 22, 2022 and on June 27, 2024 to provide for and then to increase the financial reserve goal, and most recently amended on October 23, 2025 to make certain definitional changes, and further revised on December 11, 2025 to establish specific threshold levels for reserve accumulation and introduces a risk-based analysis framework to ensure that reserve targets are aligned with the financial risks and to introduce the concept of certain Reserves to be designated as Rate Stabilization Reserves; and

WHEREAS, Community Power operates in wholesale energy markets subject to volatility, including but not limited to power and capacity price fluctuations, weather-driven load variability, regulatory and tariff changes, counterparty and credit requirements, and other events that may impact Community Power's costs and revenues; and

WHEREAS, establishing a designated Rate Stabilization Reserve is intended to provide a transparent, Board-adopted framework to (i) mitigate the rate and budget impacts of short-term market and operational variability, (ii) support maintenance of adequate liquidity and financial covenants, and (iii) preserve Community Power's ability to deliver stable and predictable generation rate outcomes for customers over time; and

WHEREAS, the Board desires to formalize a policy that defines the purpose, target level funding approach, permitted uses, approval requirements, and reporting expectations for a Rate Stabilization Reserve consistent with prudent public power and community choice aggregation financial practices.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of San Diego Community Power as follows:

Section 1. The Board of Directors hereby approves and adopts a Rate Stabilization Reserve Policy, as provided in Exhibit A, attached hereto and incorporated herein.

Section 2. If any provision of this resolution, the attached policy, or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or

applications of the resolution or policy which can be given effect without the invalid provision or application, and to this end the provisions of this resolution and the policy are severable. The Board of Directors hereby declares that it would have adopted this resolution and the attached policy irrespective of the invalidity of any particular portion thereof.

Section 3. This resolution shall take effect immediately upon its adoption.

PASSED, APPROVED AND ADOPTED at a regular meeting of the Board of Directors of San Diego Community Power held on March 26, 2026, by the following vote:

AYES:
NOES:
ABSTAIN:
ABSENT:

_____
Terra Lawson-Remer, Chair
Board of Directors
San Diego Community Power

ATTEST:

_____
Maricela Hernandez, MMC, CPMC
Secretary/Clerk of Board of Directors
San Diego Community Power

APPROVED AS TO FORM:

_____
Veera Tyagi, General Counsel
San Diego Community Power

ITEM 3
EXHIBIT A

SAN DIEGO COMMUNITY POWER

BOARD POLICY

POLICY	RATE STABILIZATION RESERVE POLICY	ORIGINAL ADOPTION DATE	
APPROVAL DATE		RESOLUTION NO.	2026-

PURPOSE AND SCOPE

San Diego Community Power (Community Power) may maintain a Rate Stabilization Reserve (RSR) as recognized in the Board-adopted Financial Reserves Policy. Any RSR will be maintained and utilized as described in this policy for the intention of providing customer rate stability.

DEFINITIONS

- **Reserves**: Unrestricted cash, cash equivalents, and investments unencumbered by legal agreements and not earmarked for specific purposes. Any Reserves that are designated by the Board of Directors as Rate Stabilization Reserves are included in the total Reserves calculation and reserve thresholds.

- **Rate Stabilization Reserves:** A type of reserve intended to provide budget stabilization for the organization while mitigating financial impacts and cost of energy to customers due to cyclical cost of energy fluctuations. It is intended to reduce rate shocks while maintaining compliance with financial covenants.

- **Rate Stability Metrics:** The change in generation rates experienced by customers due to rate changes approved by the Board of Directors, which may be measured as year-over-year rate change or value proposition change. Regular components of rates that fluctuate independently of changes approved by the Board, such as seasonal or time-differentiated rates or changes to delivery rates may be excluded from rate stability metrics.

- **Fiscal Year (FY):** The consecutive twelve-month period of July through June, identified by the calendar year of the latter half (i.e., July 2025 through June 2026 is FY 26), for use in financial planning, or as otherwise established by the Community Power Board pursuant to Section 7.1 of the Joint Powers Agreement.

- **Calendar Year (CY):** The consecutive twelve-month period of January through December, aligned with the calendar, for use in rate-setting.

- **Revenue Transfer:** A financial decision within a strong FY, defined by expected net position, to allocate a portion of revenues to the RSR. In this scenario, the allocation to the RSR is classified as a negative contribution to net position, so that these funds are not recognized as revenue within that FY.

- **Revenue Recognition:** A financial decision within a weak FY, defined by net position or rate stability metrics, to allocate a portion or all of funds in the RSR to revenues. In this scenario, the allocation from the RSR is classified as a positive contribution to net position, so that these funds are recognized as revenue within that FY.

POLICY

A. Objectives

The RSR allows Community Power to defer revenues in strong fiscal years and to withdraw revenues in weak fiscal years, relative to net position, in order to provide rate stability to customers and avoid substantial rate increases. The primary use case of the RSR is to mitigate rate volatility caused by Market Price Benchmark (MPB) and Power Charge Indifference Adjustment (PCIA) rate fluctuations, or for any other purpose, to reduce year-over-year rate changes and/or maintain Community Power's rate competitiveness between rate setting cycles.

Community Power staff will closely monitor reserves and metrics associated with rate stability and affordability to determine appropriate Revenue Transfers and Revenue Recognitions via the RSR during the fiscal year and the rate-setting process.

B. Target RSR Balance

The Target RSR Balance may be an amount up to or equivalent to 45 Days Cash on Hand, representing the Reserves between the Target Reserve Balance and Maximum Reserve Balance of Community Power's Financial Reserves, as defined in the Financial Reserves Policy. Community Power may reevaluate this Target RSR Balance annually to determine that the RSR is sufficient to cover identified risks and to mitigate rate volatility for customers. Should the balance increase above the amount equivalent to 45 Days Cash on Hand, the Community Power Board may authorize adjustment to the balance consistent with the Financial Reserves Policy.

C. Accounting

The RSR is accounted for under Government Accounting Standards Board Statements 62 which codify deferred outflows and inflows of resources. The balance of the RSR, including annual Revenue Transfers and Recognitions, will be recorded on the statement of net position in

Community Power's Statement of Revenues.

Trigger Mechanism: Revenue Transfers should be considered during fiscal years with positive net position, in which reserves are above the Target Reserve Balance as defined by the Financial Reserves Policy. Revenue Recognitions should be considered during fiscal years with an expected negative net position, or during the rate-setting process to mitigate substantial rate increases for customers. The impacts on financial or bank covenants and other appropriate financial metrics should also be a factor in the decision-making process. Community Power staff shall strive to not negatively impact the agency's financial standing via decisions related to the RSR.

Replenishment Mechanism: When Revenue Recognition decisions from the RSR are approved, Community Power staff must also present a plan to replenish the RSR within 2-4 years by the next regularly scheduled Board meeting, if feasible. Revenue Transfers and Recognitions may be made within the same fiscal year, provided that all other criteria are met.

D. **Reporting and Authorization**

The Chief Executive Officer (CEO) will have the discretion to authorize Revenue Transfer and Recognition decisions related to the RSR during the fiscal year. Any Recognition of the RSR during a fiscal year must be recommended by the CEO to the Board for approval of such use, subject to appropriation approved by the Board.

Revenue Transfer and Recognition decisions will be reported to the Board of Directors by Community Power staff at the next regularly scheduled meeting. The year-end financial report presentation to the Board will also include an update on the status of the RSR.

E. **Policy Review**

Community Power will complete a periodic review of this Rate Stabilization Reserve Policy and recommend updates to the Board, as appropriate.

F. **Miscellaneous**

Nothing in this policy shall supersede any provisions established or updated via Community Power's Financial Reserves Policy and Rate Development Policy.

PRIOR VERSIONS

DATE	ACTION	RESOLUTION NO.	POLICY NO.
N/A	N/A	N/A	N/A

RELATED POLICIES

Financial Reserves Policy – Resolution No. 2025-20
Rate Development Policy – Resolution No. 2022-12

SAN DIEGO COMMUNITY POWER

SAN DIEGO COMMUNITY POWER
Staff Report – Item 4

To:	Finance and Risk Management Committee
From:	Jeb Spengler, Senior Strategic Finance Manager
Via:	Karin Burns, Chief Executive Officer
Subject:	Recommend Board Adoption of Resolution, Authorizing San Diego Community Power to Join the California Community Choice Financing Authority as a Founding Member
Date:	March 19, 2026

Recommendation

Recommend Board adoption of Resolution, authorizing San Diego Community Power (Community Power) to participate as a founding member of the California Community Choice Financing Authority (CCCFA) and approving execution of the CCCFA Joint Powers Agreement.

Background

Community Power is responsible for procuring electric generation resources and managing financial and operational risks on behalf of its customers. As Community Power continues to scale its operations and diversify its power supply portfolio, access to flexible and cost-effective financing tools is an important component of its long-term strategy.

The California Community Choice Financing Authority (CCCFA) has been established as a joint powers authority to provide community choice aggregators with cooperative financing, credit support, and related services. CCCFA is intended to allow participating CCAs to leverage scale, share expertise, and access capital markets more efficiently than on a standalone basis.

Membership in CCCFA is divided into two tiers: the first tier consists of Founding Members and the second consists of Associate Members (as such terms are defined in the CCCFA Joint Powers Agreement). The Board of Directors of the CCCFA consist of one representative of each of the Founding Members, which currently consists of Ava Community Energy, Central Coast Community Energy, Marin Clean Energy, Silicon Valley Clean Energy and Clean Power

Alliance. Each Founding Member has appointed a Director to represent the Founding Member. The director is typically the Chief Executive Officer (CEO) or the designee of the CEO. Associate Members may be added to the CCCFA pursuant to the terms of the Joint Powers Agreement, provided that any such Associate Member possesses the power to purchase and sell electric energy and enter into related contracts for such purposes. Associate Members do not have representatives on the Board of Directors and participate subject to rules and governance documents established and shaped by the Founding Members.

Community Power joined CCCFA as an Associate Member in September 2024, the only membership tier available to new CCAs at the time. Since then, Community Power has worked closely with CCCFA as the counterparty to the first two clean energy prepayment transactions, as well as a third transaction that is currently in process as of the date of this staff report.

Analysis and Discussion

Under criteria established by the CCCFA Board, Associate members are eligible to become Founding Members subject to approval by both the CCA Board and the CCCFA Board. The criteria for becoming a Founding Member are outlined in the CCCFA Membership Criteria section of the CCCFA "Summary of Policies and Procedures For The Issuance Of Renewable Energy Prepayment Bonds":

1. Be an Associate Member of CCCFA.

2. Comply with all requirements for founding membership under CCCFA's JPA, including:
    a. File a resolution of the applicant's legislative body approving CCCFA's JPA and requesting founding membership.
    b. Receive approval of two-thirds of the entire CCCFA board as stated in JPA.
    c. File an executed counterpart to the CCCFA JPA with the Board clerk.
    d. Pay the new member fee (if 3.b below applies) and agree to pay ongoing costs for share of CCCFA planning costs, any prepay transaction fee, or any other future fees agreed upon by the Board.

3. Have either:
    a. received energy deliveries through a CCCFA prepay transaction for a minimum of one year, or
    b. employ a Director/Manager-level staff member with at least one year's direct oversight of prepay issuances and prepay operations while employed by a Founding Member CCA.

4. Be in good standing in all compliance related obligations related to the energy prepay transaction, including but not limited to ongoing disclosures, arbitrage rebate reporting and payments, eligible energy deliveries and/or remediation.

5. Designate a CCA full-time employee (at Director/Manager level or above) to serve in the CCCFA Treasurer/Controller working group as an active participant for one year and commit to continued future contributions in the working group.

6. Be current on all CCCFA associated fees and other energy prepay related fees and payments.

7. Must comply with any other transactional requirements as set forth and required by CCCFA.

At this time, Community Power meets all the necessary requirements for becoming a Founding Member.

Community Power's load size, rapid growth, and long-term clean energy procurement strategy indicate that Community Power is likely to be a frequent and recurring user of CCCFA financing structures rather than an occasional participant. Community Power's resource portfolio relies on a combination of long-term power purchase agreements, large-scale renewable and storage resources, and structured hedging strategies that are well-suited to tax-advantaged prepayment financing. Given this anticipated frequency of use, founding membership would allow Community Power to help shape CCCFA's governance, operating standards, and transaction frameworks in a manner aligned with Community Power's ongoing procurement and risk-management needs, rather than participating episodically under rules established by others. Founding Membership would ensure direct and ongoing governance representation commensurate with Community Power's expected level of utilization of CCCFA.

Fiscal Impact

There are no fee differences between the membership tiers. All members are currently contributing to the operational costs associated with CCCFA through prepay transaction fees and an annual evaluation of required shortfalls that are covered through member cash calls. In January 2026, the member cash call for each of the 11 total members of CCCFA in 2025 was $33,250. While in comparison, total energy cost savings between January 2025 and January 2026 for Community Power as a result of prepayment transactions through CCCFA totaled $7.05 million. It is anticipated that total energy cost savings will begin to exceed $20 million annually through the completion of Community Power's third transaction currently in process with CCCFA.

Strategic Plan

Given Community Power's anticipated frequent and recurring use of CCCFA financing, founding membership would provide governance influence, structural efficiency, and risk alignment commensurate with Community Power's level of participation. While associate membership provides transactional access, founding membership better aligns decision-making authority with expected utilization and supports Community Power's long-term procurement, financial, and ratepayer-protection objectives.

Attachments

A: Resolution, Authorizing San Diego Community Power to Join the California Community Choice Financing Authority as a Founding Member

- Exhibit A: Joint Powers Agreement
- Exhibit B: By-Laws

ITEM 4
ATTACHMENT A

RESOLUTION NO. 2026-__

A RESOLUTION OF THE BOARD OF DIRECTORS OF SAN DIEGO COMMUNITY POWER TO APPROVE SAN DIEGO COMMUNITY POWER BECOMING A CALIFORNIA COMMUNITY CHOICE FINANCING AUTHORITY (CCCFA) FOUNDING MEMBER.

WHEREAS, San Diego Community Power (Community Power) is a joint powers agency formed pursuant to the Joint Exercise of Powers Act (Cal. Gov. Code § 6500 *et seq.*), California Public Utilities Code § 366.2, and a Joint Powers Agreement effective on October 1, 2019, and amended and restated December 16, 2021 (JPA Agreement); and

WHEREAS, San Diego Community Power, acting pursuant to the JPA Law, may enter into a joint exercise of powers agreement with one or more other public agencies pursuant to which such contracting parties may jointly exercise any power common to them and, pursuant to Government Code Section 6588, to exercise certain additional powers; and

WHEREAS, the California Community Choice Financing Authority ("CCCFA") is a joint exercise of powers agency established under JPA Law and a Joint Powers Agreement (the "CCCFA JPA Agreement") among various California Community Choice Aggregators ("CCAs") for the purpose of undertaking the financing and refinancing of energy prepayments that can be financed with tax advantaged bonds on behalf of one or more of its members by, among other things, issuing or incurring bonds and entering into related contracts; and

WHEREAS, in September of 2024, San Diego Community Power Board initially authorized Community Power to join CCCFA, and Community Power is an Associate Member of CCCFA, and possesses the power to purchase and sell electric energy and enter into related contracts for such purchases; and

WHEREAS, San Diego Community Power is considering additional energy prepayment transactions and using CCCFA as the issuer of bonds for the purpose of financing such transactions, and in connection therewith has determined that it is in the best interests of San Diego Community Power to convert CCCFA membership to Founding Member status (as defined in the CCCFA JPA Agreement hereinafter defined) and to execute and deliver the CCCFA JPA Agreement in order to establish such membership; and

WHEREAS, there has been submitted to this meeting (i) a copy of the CCCFA Joint Powers Agreement, dated June 25, 2021, creating and establishing CCCFA, as in effect on the date hereof (the "CCCFA JPA Agreement") and CCCFA By-Laws; and

WHEREAS, under the JPA Law and the CCCFA JPA Agreement, CCCFA is a public entity separate and apart from the parties to the CCCFA JPA Agreement, and the debts, liabilities, and obligations of the CCCFA will not constitute debts, liabilities, or obligations of San Diego Community Power.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of San Diego Community Power as follows:

Section 1. **AUTHORIZED REPRESENTATIVES**. The following titled representatives are the authorized representatives of San Diego Community Power (collectively referred to as "**Authorized Representatives**" and individually referred to as an "**Authorized Representative**"):

AUTHORIZED REPRESENTATIVES
Chair of the Board
Chief Executive Officer
Chief Financial Officer
Chief Commercial Officer
Chief Operating Officer
General Counsel

Section 2. **JOINT POWERS AGREEMENT AND BY-LAWS**. The CCCFA JPA Agreement, attached hereto as Exhibit A, and the By-Laws of CCCFA, attached hereto as Exhibit B, are hereby approved.

Section 3. **FOUNDING MEMBER STATUS**. San Diego Community Power hereby requests to be added as a Founding Member of CCCFA.

Section 4. **ACTIONS AUTHORIZED**. Any one of the Authorized Representatives is authorized and approved to (a) execute and deliver the CCCFA JPA Agreement as a Founding Member, along with this Resolution, to the CCCFA Board of Directors, (b) pay any and all fees and costs and execute and deliver such other documents and agreements as may be required of a Founding Member under the terms of the CCCFA JPA Agreement, the By-Laws of CCCFA, and any other rules adopted by CCCFA Board of Directors, including San Diego Community Power's share of organization, planning, and other costs and charges as determined by CCCFA's Board of Directors; and (c) do and perform such other acts and things as any Authorized Representative may in his or her discretion deem reasonably necessary or proper in order comply with the terms and intent of the CCCFA JPA Agreement and to carry into effect the provisions of this Resolution.

IT IS HEREBY FURTHER DETERMINED AND ORDERED that the Authorized Representatives are duly elected, appointed, or employed by or for San Diego Community Power, as the case may be. This Resolution now stands

of record on the books of San Diego Community Power, is in full force and effect, and has not been modified or revoked in any manner whatsoever.

IT IS HEREBY FURTHER DETERMINED AND ORDERED that this Resolution shall take effect upon its adoption, shall be continuing and shall remain in full force and effect unless and until expressly revoked by further resolution of the Board of Directors.

PASSED AND ADOPTED at a meeting of the Board of Directors of San Diego Community Power held on March 26, 2026.

AYES:

NOES:
ABSTAIN:
ABSENT:

_____
Terra Lawson-Remer, Chair
San Diego Community Power

ATTEST:

_____
Maricela Hernandez, MMC, CPMC
Clerk of the Board/Board Secretary
San Diego Community Power

APPROVED AS TO FORM:

_____
Veera Tyagi, General Counsel
San Diego Community Power

ITEM 4
EXHIBIT A

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CALIFORNIA COMMUNITY CHOICE FINANCING AUTHORITY JOINT POWERS AGREEMENT

This Joint Powers Agreement (this "Agreement") is made by and among those public agencies who are signatories to this Agreement, and those public agencies which may hereafter become signatories to this Agreement (all such parties, except those which have withdrawn as provided herein, are referred to herein as the "Members" and those parties initially executing this Agreement are referred to as the "Founding Members"), creating a separate joint powers agency, which is named "California Community Choice Financing Authority" ("CCCFA").

WITNESSETH

WHEREAS, each Member is a "community choice aggregator," as that term is defined in Section 331.1 of the Public Utilities Code of the State of California (the "Public Utilities Code"), having duly adopted, established and implemented a community choice aggregation program pursuant to Section 366.2 of the Public Utilities Code, with the authority to group retail electricity customers to solicit bids, broker, and contract for electricity and energy services for those customers, and to enter into agreements for services to facilitate the sale and purchase of electricity and other related services, and to study, promote, develop, conduct, operate and manage energy-related programs; and

WHEREAS, each Member is a "public agency," as that term is defined in Section 6500 of the Government Code of the State of California (the "Government Code"); and

WHEREAS, Chapter 5 of Division 7 of Title 1 of the Government Code, being Section 6500 and following (the "Act"), authorizes a joint exercise by two or more public agencies of any power which is common to each of them and the creation of an entity that is separate from the parties to the joint exercise of powers agreement; and

WHEREAS, it is to the mutual benefit of the Members and in the public interest that an agency by the name of the California Community Choice Financing Authority be created, by which the Members jointly exercise for their common benefit and for the purposes specified herein certain powers that they have in common or are otherwise provided for by applicable law, including but not limited to (i) the acquisition and operation of power supplies, resource adequacy and renewable attributes, and (ii) the provision of other energy services or programs which may be of benefit to one or more Members; and

WHEREAS, the Act conveys upon joint exercise of powers authorities certain additional powers, including but not limited to the power to issue revenue bonds and incur other evidences of indebtedness for such purposes as are specified in the Act; and

WHEREAS, CCCFA's purpose is to assist Members by undertaking the financing or refinancing of energy prepayments that can be financed with tax advantaged bonds on behalf of one or more of the Members by, among other things, issuing or incurring Bonds (as such term is defined herein) and entering into related contracts with Members.

NOW, THEREFORE, the Members, for and in consideration of the mutual promises and agreements herein contained, do hereby agree as follows:

Article I. DEFINITIONS

In addition to the other terms defined herein, the following terms, whether in the singular or in the plural, when used herein and initially capitalized, shall have the meanings specified throughout this Agreement.

Section 1.01 **"Act"** means Chapter 5 of Division 7 of Title 1 of the Government Code (Section 6500 *et seq.*), as supplemented and amended from time to time, including without limitation the Marks-Roos Local Bond Pooling Act of 1985.

Section 1.02 **"Agreement"** means this Joint Powers Agreement, as it may be supplemented and amended from time to time in accordance with the terms hereof.

Section 1.03 **"Associate Member"** means any Public CCA Agency that is a signatory to this Agreement and that has met the requirements of Section 3.02 below to become an Associate Member. The term "Associate Member" shall, however, exclude any Associate Member which shall have withdrawn or been excluded from CCCFA pursuant to Section 3.04 below.

Section 1.04 **"Board"** means the Board of Directors of CCCFA as established by this Agreement.

Section 1.05 **"Bonds"** means bonds, notes, commercial paper, installment purchase, lease purchase and similar agreements and certificates of participation therein, and any other evidences of indebtedness.

Section 1.06 **"CCCFA"** means the California Community Choice Financing Authority, the Joint Powers Authority established by this Agreement.

Section 1.07 **"Director"** means each Director duly appointed and serving on the Board as provided in Article IV of this Agreement.

Section 1.08 **"Founding Member"** means each of the Public CCA Agencies initially executing this Agreement, and any Public CCA Agency that becomes a Founding Member pursuant to Section 3.01 below. The term "Founding Member" shall, however, exclude any Founding Member which shall have withdrawn or been excluded from CCCFA pursuant to Section 3.04 below. The initial Founding Members are Central Coast Community Energy, East Bay Community Energy, Marin Clean Energy, and Silicon Valley Clean Energy.

Section 1.09 **"Government Code"** means the Government Code of the State of California.

Section 1.10 **"Member"** means a Founding Member or an Associate Member.

Section 1.11 **"Prepayment Project"** means, in connection with the financing or refinancing of energy prepayments that can be financed with tax advantaged bonds and other obligations: (i) the purchase and sale of electric energy and associated capacity and environmental attributes, (ii) the design, acquisition, maintenance, or operation of any Public Capital Improvement (as defined in the Act) or other facility or improvement, or the leasing thereof, (iii) the provision of working capital, and (iv) any other project, program, public capital improvement or purpose authorized by the Act or other law to be undertaken, financed, or refinanced by CCCFA, subject to CCCFA's approval of an application from one or more Members for support of such project, program, public capital improvement or authorized purpose and in connection with the financing or refinancing of energy prepayments that can be financed with tax advantaged bonds and other obligations.

Section 1.12 **"Prepayment Project Contract"** means a contract among any Members and CCCFA in connection with the undertaking, financing or refinancing of a Prepayment Project by such Members and CCCFA in accordance with the terms of this Agreement.

Section 1.13 **"Public CCA Agency"** means any community choice aggregator, as such term is defined in Section 331.1 of the Public Utilities Code, that is a public agency, as such term is defined in the Act, which has implemented a CCA program pursuant to Section 366.2 of the Public Utilities Code.

Section 1.14 **"Public Utilities Code"** means the Public Utilities Code of the State of California.

Article II. FORMATION OF AUTHORITY

Section 2.01 **Creation of CCCFA.** Pursuant to the Act, there is hereby created a public entity, to be known as the "California Community Choice Financing Authority," which shall be a public entity separate and apart from its Members. The debts, liabilities and obligations of CCCFA shall not constitute debt, liabilities or obligations of any Member.

Section 2.02 **Purpose.** This Agreement is made, and CCCFA is being established, pursuant to the Act to provide for the joint exercise of powers common to the parties hereto to assist the Members in financing or refinancing energy prepayments that can be financed with tax advantaged bonds and other obligations on behalf of one or more of the Members, including by undertaking, financing or refinancing Prepayment Projects on behalf of one or more of the Members and/or CCCFA, all as further described in Section 2.03 hereof. CCCFA will fulfill the purposes of this Agreement by, among other things, undertaking the sale and issuance or incurrence of Bonds to finance or refinance Prepayment Projects on behalf of one or more of the Members and/or CCCFA in accordance with the Act. CCCFA is not being formed for the purposes of providing municipal services within the meaning of Section 6503.6 or Section 6503.8 of the Act.

Section 2.03 **Powers.** CCCFA, in its own name, shall have any and all power to undertake Prepayment Projects on behalf of one or more of the Members and/or CCCFA, and to finance or refinance such Prepayment Projects through the sale and issuance or incurring of Bonds for the purposes set forth in Section 2.02 hereof. CCCFA is empowered to exercise any and all common powers of the Members, and any other powers provided to it by any applicable laws, beneficial for the issuance or incurrence from time to time of such Bonds pursuant to Article VII hereof. Without limiting the generality of the foregoing, CCCFA, in its own name, shall have the power:

(a) to acquire, purchase, finance, operate, maintain, utilize and/or dispose of one or more Prepayment Projects and any facilities, programs or other authorized costs relating thereto;
(b) to make and enter contracts (including without limitation interest rate, commodity, basis and similar hedging contracts intended to hedge payment, rate, cost or similar exposure);
(c) to employ agents and employees;
(d) to acquire, manage, maintain or operate any building, works or improvements;
(e) to acquire, hold, lease or dispose of property;
(f) to incur debts (including without limitation through the issuance or incurrence of Bonds), liabilities or obligations (which shall not constitute debts, liabilities, or obligations of any of the Members);
(g) to sue and be sued in its own name;
(h) to receive gifts, contributions and donations of real or personal property, funds, services and other forms of assistance from any source;
(i) to receive, collect, invest and disburse moneys;
(j) to apply for, accept, and receive all licenses, permits, grants, loans or other aids from any federal, state, or local public agency;
(k) to make and enter into service agreements relating to the provision of services necessary to plan, implement, operate and administer energy-related programs;
(l) to defend, hold harmless, and indemnify, to the fullest extent permitted by law, each Member from any liability, claims, suits, or other actions;

(m) to exercise any other power and take any other action permitted by law to accomplish the purposes of this Agreement.

Such powers shall be exercised by CCCFA subject only to such restrictions upon the manner of exercising such power as are imposed upon Silicon Valley Clean Energy in the exercise of similar powers, as provided in Section 6509 of the Act, and, should Silicon Valley Clean Energy withdraw or be excluded from this Agreement pursuant to Section 3.04 hereof, the manner of exercising any power shall be subject only to the restrictions upon the manner of exercising such powers as are imposed upon Marin Clean Energy in the exercise of similar powers; *provided, however*, that nothing herein shall limit the powers of CCCFA under Article 4 of the Act.

Any Bonds issued or incurred by CCCFA shall not constitute general obligations of CCCFA, but shall be payable solely from the moneys pledged to the payment of principal of or interest on such Bonds under the terms of the resolution, indenture, trust agreement or other instrument pursuant to which the Bonds are issued or incurred, as further described in Article VII hereof. Such Bonds shall not constitute debts, liabilities or obligations of the Members.

Any of the Prepayment Projects acquired, financed or refinanced by CCCFA shall be operated by a Member or CCCFA for and on behalf of CCCFA, either directly or pursuant to contract or agreement with a third party designated by the applicable Member or Members and approved by CCCFA. None of the Members or CCCFA shall have liability for the breach, negligence or willful misconduct of any such third party.

Article III. MEMBERSHIP

Section 3.01 Founding Members. A Public CCA Agency will be qualified to join as a Founding Member only if it possesses the power to purchase and sell electric energy and enter into related contracts for such purposes. Public CCA Agencies may be added as parties to this Agreement and become Founding Members, and existing Associate Members may be elevated to Founding Members, upon: (1) the filing by such Public CCA Agency with the Board of an executed counterpart of this Agreement, together with a copy of the resolution of the governing body of such Public CCA Agency approving this Agreement and the execution and delivery hereof, and requesting to be added as a Founding Member of CCCFA; (2) the approval at a regular or special meeting of the Board by at least two-thirds (2/3) of the entire Board, and the adoption of a resolution of the Board approving the addition of such Public CCA Agency as a Founding Member; and (3) the deposit with, or the written agreement to pay to, CCCFA a share of organization, planning and other costs and charges as determined by the Board to be appropriate, if any. Upon satisfaction of such conditions, the Board shall file such executed counterpart of this Agreement as an amendment hereto, effective upon such filing. Upon completion of the foregoing, the Public CCA Agency shall become a Founding Member for all purposes of this Agreement.

Section 3.02 Associate Members. A Public CCA Agency will be qualified to join as an Associate Member only if it possesses the power to purchase and sell electric energy and enter into related contracts for such purposes. Public CCA Agencies may be added as Associate Members of CCCFA upon: (1) the filing by such Public CCA Agency with the Board of an executed counterpart of this Agreement, together with a copy of the resolution of the governing body of such Public CCA Agency approving this Agreement and the execution and delivery hereof, and requesting to be added as an Associate Member of CCCFA; (2) the approval at a regular or special meeting of the Board by a majority vote of the Directors in attendance, provided a quorum is established and maintained, and the adoption of a resolution of the Board approving the addition of such Public CCA Agency as an Associate Member; and (3) the deposit with, or the written agreement to pay to, CCCFA a share of organization, planning and other costs and charges as determined by the Board to be appropriate, if any. Upon satisfaction of such conditions, the Board shall file such executed counterpart of this Agreement as an amendment hereto, effective upon such filing. Upon completion of the foregoing, the Public CCA Agency shall become an Associate Member for all purposes of this Agreement.

Section 3.03 Cost Allocations.

(a) Unless otherwise determined by a two-thirds (2/3) vote of the entire Board, each Member shall pay an equal share of one Member one share for general and administrative costs as determined by the Board associated with all operations of CCCFA. General and administrative costs do not include any costs that relate solely to any specific Prepayment Project Contract.

(b) The costs of each Prepayment Project shall be allocated solely to the Member or Members undertaking or participating in such Prepayment Project or on whose behalf CCCFA undertakes such Prepayment Project, which allocation shall be described in a Prepayment Project Contract relating to such Prepayment Project.

Section 3.04 Withdrawal or Exclusion of Member.

(a) Any Member may withdraw from CCCFA upon the following conditions:

(i) The Member shall have filed with the Board Secretary a certified copy of a resolution of its governing body expressing its desire to so withdraw. If a Founding Member files a resolution to withdraw with the Board Secretary, that Founding Member no longer has any voting rights on the Board;

(ii) Members undertaking or participating in Prepayment Projects or on whose behalf CCCFA undertakes a Prepayment Project shall remain subject to the cost allocation, participation and withdrawal terms and conditions, as applicable, set forth in the applicable Prepayment Project Contract; and

(iii) Prior to the Board accepting the Member's filing of such resolution, any Member so terminating shall be obligated to pay its share of general and administrative costs then due. However, this obligation shall take into account any refunds due to the Member and shall not extend to debts, liabilities and obligations of CCCFA. The debts, liabilities and obligations of CCPFA shall not constitute debt, liabilities or obligations of any Member.

(iv) No such withdrawal shall, or shall be permitted if it would, result in (a) CCCFA having fewer than three Founding Members; or (b) the dissolution of CCCFA so long as any Bonds remain outstanding under any resolution, indenture, trust agreement or other instrument pursuant to which such Bonds are issued or incurred.

(b) Upon compliance with the conditions specified in Section 3.04(a), the Board shall accept the withdrawing Member's resolution and the withdrawing Member shall no longer be considered a Member for any reason or purpose under this Agreement and its rights and obligations under this Agreement shall terminate. The withdrawal of a Member shall not affect any obligations of such Member under any Prepayment Project Contract or other program agreement.

(c) Any Member which has (i) defaulted under this Agreement, a Prepayment Project Contract, or other program agreement, (ii) if such Member is a Founding Member, failed to appoint a Director to serve on the Board in accordance with Section 4.02 below, or (iii) failed to pay any required share of costs in accordance with Sections 3.01, 3.02, and 3.03 above, may have its rights under this Agreement terminated and may be excluded from participation in CCCFA by the vote (taken at a regular or special meeting of the Board) of at least two-thirds (2/3) of the entire Board (including the Director representing the defaulting Member, if such Member is a Founding Member). Prior to any vote to terminate participation of any Member, written

notice of the proposed termination and the reason(s) for such termination shall be delivered to the Member whose termination is proposed at least 60 days prior to the Board meeting at which such matter shall first be discussed as an agenda item. The written notice of the proposed termination shall specify the particular provisions of this Agreement or a Prepayment Project Contract or other program agreement which the Member has allegedly defaulted on, or whether the proposed termination is based on failure to appoint a Director (if such Member is a Founding Member) or pay any required share of costs. The Member subject to possible termination shall have the opportunity to cure the violation prior to the meeting at which termination will be considered. At the meeting where termination of the Member is considered, the Member shall be given the opportunity to respond to any reasons and allegations that may be cited as a basis for termination prior to a termination vote. Any excluded Member shall continue to be liable for its obligations under any Prepayment Project Contract or other program agreement and for any unpaid contribution, payment, or advance approved by the Board prior to such Member's exclusion. No such termination shall, or shall be permitted if it would, result in (a) CCCFA having fewer than three Founding Members; or (b) the dissolution of CCCFA so long as any Bonds remain outstanding under any resolution, indenture, trust agreement or other instrument pursuant to which such Bonds are issued or incurred.

(d) The withdrawal or termination of a Member shall not affect the provisions or obligations set forth in Article VIII or Section 11.04 below.

Section 3.05 Contributions and Advances. Contributions or advances of public funds and of personnel, equipment or property may be made to CCCFA by any Member for any of the purposes of this Agreement. Payment of public funds may be made to defray the cost of such purpose. Any such advance shall be made subject to repayment, and shall be repaid in the manner agreed upon by such Member and CCCFA at the time of making such advance. It is mutually understood and agreed that no Member is under any obligation to make advances or contributions to CCCFA to provide for the costs and expenses of administration of CCCFA, even though any Member, in its sole discretion, may do so. Any Founding Member may allow the use of personnel, equipment or property in lieu of other contributions or advances to CCCFA.

Article IV. POWERS OF BOARD & MANAGEMENT OF CCCFA

Section 4.01 Board. CCCFA shall be administered by a Board which shall consist of one Director representing each Founding Member. Such Board shall be the governing body of this CCCFA, and, as such, shall be vested with the powers set forth in this Agreement, and shall execute and administer this Agreement in accordance with the purposes and functions provided herein. The Board shall have the authority to provide for the general management and oversight of the affairs, property and business of CCCFA.

Section 4.02 Appointment and Vacancies. Each Director shall be the Chief Executive Officer, General Manager, Executive Director, or designee of the Chief Executive Officer, General Manager, or Executive Director, of each Founding Member and shall be appointed by and serve at the pleasure of the Founding Member that the Director represents, and may be removed as Director by such Founding Member at any time. If at any time a vacancy occurs on the Board, a replacement shall be appointed by the Founding Member to fill the position of the previous Director in accordance with the provisions of this Article IV within 60 days of the date that such position becomes vacant or the Founding Member shall be subject to the exclusion procedures in Section 3.04(c) above. Each Director may appoint an alternate to serve in their absence.

Section 4.03 Notices. The Board shall comply with the applicable provisions of Sections 6503.5, 6503.6 and 53051 of the Government Code requiring the filing of notices and a statement with the Secretary of State and the State Controller.

Section 4.04 Committees. The Board may create committees to provide advice to the Board or conduct the business of CCCFA subject to delegation of authority from the Board as permitted in the bylaws and any applicable laws.

Section 4.05 Director Compensation. Compensation for work performed by Directors, including alternates, on behalf of CCCFA shall be borne by the Founding Member that appointed the Director. The Board, however, may adopt by resolution a policy relating to the reimbursement of expenses incurred by Directors.

Section 4.06 Board Officers. At its first meeting in every second calendar year, the Board shall elect or re-elect a Chair and a Vice-Chair, each of whom shall be selected from among the Directors and shall also appoint or re-appoint a Secretary, and a Treasurer/Controller, each of whom may, but need not, be selected from among the Directors.

(a) **Chair and Vice-Chair**. The duties of the Chair shall be to preside over the Board meetings, sign all ordinances, resolutions, contracts and correspondence adopted or authorized by the Board, and to help ensure the Board's directives and resolutions are carried out. In the absence or inability of the Chair to act, the Vice Chair shall act as Chair.

(b) **Treasurer/Controller.** The Board shall appoint a qualified person to act as the Treasurer/Controller, who does not need to be a Director. Where a certified public accountant has been designated as Treasurer/Controller of CCCFA, the auditor of one of the Founding Members or of a county in which one of the Founding Members is located shall be designated as auditor of CCCFA. Subject to the provisions of any resolution, indenture, trust agreement or other instrument providing for a trustee or other fiscal agent in connection with any Bonds, and, except as may otherwise be specified by resolution of CCCFA, the Treasurer/Controller shall be the depository of CCCFA to have custody of all the money of CCCFA, from whatever source, and, as such, shall have the powers, duties and responsibilities specified in Section 6505.5 of the Government Code. The Treasurer/Controller is hereby designated as the public officer or person who has charge of, handles, or has access to any property of CCCFA, and such officer shall file an official bond in an amount determined from time to time by the Board as required by Section 6505.1 of the Government Code. The Treasurer/Controller shall cause an independent audit to be made by a certified public accountant, or public accountants, in compliance with Section 6505 of the Government Code. The Treasurer/Controller shall also create or caused to be created a report in writing on the first day of each fiscal quarter to CCCFA and each Founding Member, which report shall describe the amount of money held by the Treasurer/Controller, the amount of receipts since the last such report, and the amount paid out since the first such report.

(c) **Secretary.** The Secretary shall be responsible for keeping the minutes of all meetings of the Board and all other official records of CCCFA, and responding to public records requests of the JPA.

Section 4.07 Management of CCCFA. The Board may appoint a part-time or full-time General Manager, and may appoint one or more part-time or full-time Assistant General Managers, to serve at the pleasure of the Board. If a General Manager has been appointed, the General Manager shall be responsible for the day-to-day operation and management of CCCFA. If no General Manager shall have been appointed, the Treasurer/Controller shall be responsible for the day-to-day operation and management of CCCFA. The General Manager, if any, and the Treasurer/Controller may each enter into and execute contracts in accordance with the policies established and direction provided by the Board, and shall file an official bond in the amount determined from time to time by the Board.

Section 4.08 Other Officers and Employees. The Board shall have the power to appoint such other officers, deputies, legal counsel (which may be the legal counsel to one or more of the Members) and staff as it may deem necessary who shall have such powers, duties and responsibilities as are determined by the Board, and to retain independent accountants, legal counsel, engineers and other consultants. The Founding Members may contract with CCCFA to provide staff to perform services for CCCFA, but such employees shall at all times, and for all purposes including benefits and compensation, remain employees of the Founding Member only.

Section 4.09 Budget. The budget shall be approved by the Board. The Board may revise the budget from time-to-time as may be reasonably necessary to address contingencies and expected expenses. All subsequent budgets of CCCFA shall be approved by the Board in accordance with rules as may be adopted by the Board from time to time. All expenditures must be made in accordance with the adopted budget.

Section 4.10 Fiscal Year. Unless changed by resolution of the Board, the fiscal year of CCCFA shall be the period from January 1 of each year to and including the following December 31.

Article V. MEETINGS OF THE BOARD

Section 5.01 Regular Meetings. The Board shall hold at least one regular meeting per year, but the Board may provide for the holding of regular meetings at more frequent intervals. The date, hour and place of each regular meeting shall be fixed by resolution of the Board. Regular meetings may be adjourned to another meeting time.

Section 5.02 Special Meetings. Special and emergency meetings of the Board may be called in accordance with the provisions of Government Code Sections 54956 and 54956.5, as amended.

Section 5.03 Brown Act Compliance. All meetings of the Board shall be conducted in accordance with the provisions of the Ralph M. Brown Act (Government Code Section 54950 *et seq.*), and as augmented by rules of the Board not inconsistent therewith. Directors may participate in meetings telephonically or by other electronic means, with full voting rights, to the extent permitted by law.

Section 5.04 Minutes. The Secretary shall cause to be kept minutes of the meetings of the Board, both regular and special, and shall cause a copy of the minutes to be forwarded promptly to each Director.

Section 5.05 Quorum. A quorum of the Board shall consist of a majority of the Directors, except that less than a quorum may adjourn from time to time in accordance with law.

Section 5.06 Voting. Each Founding Member shall have one vote, which may be cast on any matter before the Board by each Director or alternate. Except to the extent otherwise specified in this Agreement, or by law, a vote of the majority of the Directors in attendance shall be required and sufficient to constitute action, provided a quorum is established and maintained.

(a) Special Voting Requirements as specified in this Agreement:

(i) Action of the Board on the matters set forth in Section 3.01 related to addition of Founding Members shall require the affirmative vote of at least two-thirds (2/3) of the Entire Board.

(ii) Action of the Board on the matters set forth in Section 3.04(c) related to involuntary termination of a Member shall require the affirmative vote of at least two-thirds (2/3) of the entire Board.

(iii) Action of the Board on the matters set forth in Section 9.01 related to termination of this Agreement shall require the affirmative vote of at least two-thirds (2/3) of the entire Board approved by resolution of each Founding Member's governing body.

(iv) Action of the Board to amend any other provision of this Agreement shall be subject to the voting requirements set forth in Section 11.03 below.

Section 5.07 Rules and Regulations. CCCFA may adopt, from time to time, by resolution of the Board such bylaws, policies or rules and regulations for the conduct of its meetings and affairs as may be required.

Article VI. PREPAYMENT PROJECTS

Section 6.01 Prepayment Projects. The Board has the power, upon majority vote of the Directors in attendance, provided a quorum is established and maintained, to approve the application of any Member for the undertaking, financing, or refinancing of any Prepayment Projects within the purpose and power of CCCFA and to adopt guidelines for their implementation.

Section 6.02 Prepayment Project Contract. The costs and other expenses of each Prepayment Project, including without limitation applicable administrative costs of CCCFA with respect to the Prepayment Project, shall be allocated solely to the Member or Members undertaking or participating in such Prepayment Project or on whose behalf CCCFA undertakes such Prepayment Project, which allocation shall be described in a Prepayment Project Contract relating to such Prepayment Project, which will be separate and distinct from this Agreement.

Article VII. BONDS AND OTHER INDEBTEDNESS

In addition to the other powers conferred on CCCFA by this Agreement, CCCFA shall have the power to issue, incur, sell and deliver Bonds in accordance with the provisions of the Act and other applicable laws for the purpose of acquiring, undertaking, financing, or refinancing one or more Prepayment Projects. The terms and conditions of the issuance or incurrence of any such bonds or indebtedness shall be set forth in a resolution, indenture trust agreement, or other instrument pursuant to which the Bonds are issued or incurred, as required by law and as approved by the Board. CCCFA's debts, liabilities and obligations with respect to Bonds issued or incurred under this Agreement and contracts or obligations entered into to carry out the purposes for which Bonds are issued or incurred, shall not constitute a debt, liability or obligation of any of the Members.

Any Bonds issued or incurred by CCCFA shall not constitute general obligations of CCCFA, but shall be payable solely from the moneys pledged to the payment of principal of or interest on such Bonds under the terms of the resolution, indenture, trust agreement or other instrument pursuant to which the Bonds are issued or incurred.

Article VIII. LIMITATION ON LIABILITY OF MEMBERS

Section 8.01 Pursuant to Section 6508.1 of the Government Code, no debt, liability or obligation of CCCFA shall be a debt, liability or obligation of any Member. Nothing contained in this Article VIII shall in any way diminish the liability of any Member with respect to any Prepayment Project Contract such Member enters into pursuant to this Agreement.

Section 8.02 Notwithstanding anything to the contrary in this Agreement or otherwise, CCCFA shall not have the power to and shall not enter into any retirement contract with any public retirement system (as defined in Section 6508.1 of the Government Code) for any reason. The provision in this paragraph is intended to

benefit Members and to be a confirming, irrevocable obligation of CCCFA which may be enforced by Members individually or collectively.

Article IX. TERM; TERMINATION; LIQUIDATION; DISTRIBUTION

Section 9.01 Term and Termination. This Agreement shall become effective when at least three Founding Members execute this Agreement. This Agreement shall continue in full force and effect until terminated as provided in this Article; *provided, however*, this Agreement cannot be terminated while either (a) any Bonds of CCCFA remain outstanding under the terms of the resolution, indenture, trust agreement or other instrument pursuant to which such Bonds are issued or incurred, or (b) CCCFA is the owner, lessor or lessee of any real or personal property financed from the proceeds of any Bonds. This Agreement may be terminated by a two-thirds (2/3) vote of the entire Board that is approved by resolution of each Founding Member's governing body; *provided, however*, that this Agreement and CCCFA shall continue to exist after termination for the purpose of disposing of all claims, distribution of assets and all other functions necessary to conclude the obligations and affairs of CCCFA. In any event, CCCFA shall cause all records regarding its formation, existence, the Prepayment Projects, any Bonds issued or incurred by it and proceedings pertaining to its termination to be retained for at least six years (or as otherwise required by law) following termination of CCCFA or final payment of any Bonds issued or incurred by CCCFA, whichever is later.

Section 9.02 Liquidation; Distribution. Upon termination of this Agreement, the Board shall liquidate the business and assets and the property of CCCFA as expeditiously as possible, and distribute any net proceeds, after the conclusions of all debts and obligations of CCCFA, to any Members in proportion to the contributions made or in such manner as otherwise provided by law. The Board is vested with all powers of CCCFA for the purpose of concluding and dissolving the business affairs of CCCFA. Notwithstanding the foregoing, no dissolution of CCCFA shall be permitted while either (a) any Bonds of CCCFA remain outstanding, or (b) CCCFA is the owner, lessor or lessee of any real or personal property financed from the proceeds of any Bonds.

ARTICLE X. ACCOUNTS AND REPORTS

Section 10.01 Establishment and Administration of Funds. CCCFA is responsible for the strict accountability of all funds and reports of all receipts and disbursements. It will comply with every provision of law relating to the establishment and administration of funds, including without limitation Section 6505 of the Government Code. CCCFA shall establish and maintain such funds and accounts as may be required by good accounting practice or by any provision of any resolution, indenture or other instrument of CCCFA securing its bonds or other indebtedness, except insofar as such powers, duties and responsibilities are assigned to a trustee appointed pursuant to such resolution, indenture or other instrument. The books and records of CCCFA shall be open to inspection at all reasonable times to each Member and its representatives.

Section 10.02 Annual Audits and Audit Reports. The Treasurer/Controller shall cause an annual independent audit of the accounts and records of CCCFA to be made by a certified public accountant or public accountant in accordance with all applicable laws. If permitted by applicable law and authorized by the Board, the audit(s) may be conducted at the longer interval authorized by applicable law. A report of the financial audit will be filed as a public record with each Member not later than 270 days after the close of the fiscal year or fiscal years under examination. CCCFA will pay the cost of the financial audit and charge the cost against the Members in the same manner as other administrative costs.

ARTICLE XI. GENERAL PROVISIONS

Section 11.01 Conflict of Interest Policy. CCCFA, unless otherwise exempt, shall adopt a conflict of interest policy as required under applicable laws of the State of California. Counsel to CCCFA for financing

matters, including bond counsel, shall not be considered a consultant or other designated position for purposes of the conflict of interest policy.

Section 11.02 Successors and Assigns. This Agreement shall be binding upon and shall inure to the benefit of the successors of the parties. Except to the extent expressly provided herein, neither a Member nor CCCFA may assign any right or obligation under this Agreement without the consent of all other Members.

Section 11.03 Amendments. Subject to any requirements of law, a two-thirds (2/3) vote of the entire Board will be required to amend Articles II, III, VIII, and IX of this Agreement, and an amendment of Section 8.02 and Section 11.03 of this Agreement shall require an affirmative vote of the entire Board. Once an amendment of Articles II, III, VIII, or IX is adopted by the Board, the amendment must be approved by two-thirds of the Founding Members pursuant to each Founding Member's applicable approval process, and an amendment of Section 8.02 and Section 11.03 of this Agreement shall require an affirmative vote of all Founding Members pursuant to each Founding Member's applicable approval process. All other provisions of this Agreement may be amended at any time or from time to time by an amendment approved by at least two-thirds (2/3) vote of the entire Board. Written notice shall be provided to all Members of proposed amendments to this Agreement, including the effective date of such amendments, at least thirty (30) days prior to the date upon which the Board votes on such amendments. Each Member hereby agrees to take any actions necessary on its part to approve any amendment adopted pursuant to this Section 11.03, and if any Member fails to perform any such actions, such Member shall be deemed to have submitted a resolution of withdrawal pursuant to the provisions of Section 3.04 hereof.

Notwithstanding the foregoing, this Agreement shall not terminate while any Bonds of CCCFA remain outstanding under the terms of the resolution, indenture, trust agreement or other instrument pursuant to which such Bonds are issued or incurred.

Section 11.04 Indemnification and Insurance. To the fullest extent permitted by law, CCCFA shall defend, indemnify, and hold harmless the Members and each Director, alternate, officer, employee and agent from any and all claims losses damages, costs, injuries and liabilities of every kind arising directly or indirectly from the conduct, activities, operations, acts, and omissions of CCCFA under this Agreement to the extent not otherwise provided under a Prepayment Project Contract. CCCFA shall acquire such insurance coverage as the Board deems is necessary and appropriate to protect the interests of CCCFA and the Members.

Section 11.05 Waiver of Personal Liability. No member, director, commissioner, officer, agent or employee of CCCFA or the Members, respectively, past, present or future, shall be individually or personally liable for the observance or performance of any terms, conditions or provisions hereof or for any claims, losses, damages, costs, injury and liability of any kind, nature or description arising from the actions of CCCFA or the actions undertaken pursuant to this Agreement; provided, however, that nothing herein shall relieve any such person from the performance of any official duty provided hereby or by applicable provision of law.

Section 11.06 Limitation of Rights. All of the covenants, agreements, terms and conditions in this Agreement to be observed or performed by or on behalf of CCCFA or the Members shall be for the sole and exclusive benefit of CCCFA and the Members, whether so expressed or not, and nothing contained herein, express or implied, is intended to or shall give any other person other than CCCFA and the Members any legal or equitable right, remedy or claim hereunder.

Section 11.07 Notices. The Board shall designate its principal office as the location at which it will receive notices, correspondence, and other communications, and shall designate one of its Directors or staff as an officer for the purpose of receiving service of process on behalf of CCCFA. Any notice given pursuant to this Agreement shall be in writing and shall be dated and signed by the Member giving such notice. Notice to each Member under this Agreement is sufficient if mailed to the Member, and separately to the Director appointed by such Founding Member, to their respective addresses on file with CCCFA.

Section 11.08 Severability. Should any portion, term, condition, or provision of this Agreement be determined by a court of competent jurisdiction to be illegal or in conflict with any law of the State of California, or be otherwise rendered unenforceable or ineffectual, the remaining portions, terms, conditions, and provisions shall not be affected thereby.

Section 11.09 Section Headings. The section headings herein are for convenience only and are not to be construed as modifying or governing the language in the section to which they refer.

Section 11.10 Choice of Law. This Agreement will be governed and construed in accordance with the laws of the State of California.

Section 11.11 Counterparts. This Agreement may be executed in any number of counterparts, and each executed counterpart shall have the same force and effect as an original instrument and as if all Members had signed the same instrument.

Section 11.12 Dispute Resolution. The Members shall make reasonable efforts to informally settle all disputes arising out of, or in connection with, this Agreement. Should such informal efforts to settle a dispute fail, the dispute shall be mediated in accordance with policies and procedures established by the Board. In the event such mediation fails to settle a dispute, the parties may pursue any remedies provided by law.

[Signature Page Follows]

IN WITNESS WHEREOF, each Member hereto has caused this Agreement to be executed as an original counterpart by its duly authorized representative on the date indicated below.

DocuSigned by:

By: Dawn Weisz
A59878416EBC4F8...

Name: Dawn Weisz

Title: CEO

CCA Name: MCE

Date: June 25, 2021

DocuSigned by:

By: Girish Balachandran
6CA64B9AC4C24C3...

Name: Girish Balachandran

Title: CEO

CCA Name: Silicon Valley Clean Energy

Date: June 25, 2021

DocuSigned by:

By:
9DF6BA3222CE44F...

Name: Nick Chaset

Title: CEO

CCA Name: East Bay Community Energy

Date: June 25, 2021

DocuSigned by:

By: Tom Habashi
69C253774488497...

Name: Tom Habashi

Title: CEO

CCA Name: central coast community energy

Date: June 25, 2021

IN WITNESS WHEREOF, each Member hereto has caused this Agreement to be executed as an original counterpart by its duly authorized representative on the date indicated below.

By: E-SIGNED by Donald Eckert on 2022-09-02 12:27:33 PDT

Name: Donald Eckert

Title: Executive Director

CCA Name: Pioneer Community Energy

Date: September 02, 2022

IN WITNESS WHEREOF, each Member hereto has caused this Agreement to be executed as an original counterpart by its duly authorized representative on the date indicated below.

DocuSigned by:

By: _____
DCE57B93C1DA48A...

Name: Ted Bardacke

Title: Chief Executive Officer

CCA Name: Clean Power Alliance of Southern California

Date: 9/6/2022

IN WITNESS WHEREOF, each Member hereto has caused this Agreement to be executed as an original counterpart by its duly authorized representative on the date indicated below.

By: Lori Mitchell

Name: Lori Mitchell

Title: Director, Energy

CCA Name: City of San José

Date: 6/17/2024

IN WITNESS WHEREOF, each Member hereto has caused this Agreement to be executed as an original counterpart by its duly authorized representative on the date indicated below.

By: Shawn Marshall

Name: Shawn Marshall

Title: Chief Executive Officer

CCA: Name: Peninsula Clean Energy

Date: 8/23/24

IN WITNESS WHEREOF, each Member hereto has caused this Agreement to be executed as an original counterpart by its duly authorized representative on the date indicated below.

By: Eric Washington (Oct 16, 2024 15:14 PDT)

Name: Dr. Eric W. Washington

Title: Chief Finanical Officer

CCA Name: San Diego Community Power

Date: October 16, 2024

IN WITNESS WHEREOF, each Member hereto has caused this Agreement to be executed as an original counterpart by its duly authorized representative on the date indicated below.

By:_____

Name: Geof Syphers

Title: Chief Executive Officer

CCA Name: Sonoma Clean Power Authority

Date: October 17, 2024

IN WITNESS WHEREOF, each Member hereto has caused this Agreement to be executed as an original counterpart by its duly authorized representative on the date indicated below.

By:_____

Name: Mitch Sears

Title: Executive Officer

CCA Name: Valley Clean Energy Alliance

Date: October 16, 2024

Docusign Envelope ID: B0D4166C-4E16-4BD4-A731-3055C77B0039

IN WITNESS WHEREOF, each Member hereto has caused this Agreement to be executed as an original counterpart by its duly authorized representative on the date indicated below.

Signed by:

By: Joseph M. Mosca
DF577304A3D442A...

Name: Joseph M. Mosca

Title: Chief Executive Officer

CCA Name: Orange County Power Authority

Date: 1/28/2026

ITEM 4
EXHIBIT B

BYLAWS OF THE

CALIFORNIA COMMUNITY CHOICE FINANCING AUTHORITY

Adopted June 25, 2021

BYLAWS OF THE CALIFORNIA COMMUNITY CHOICE FINANCING AUTHORITY

ARTICLE I - THE AUTHORITY

Section 1.1 Name. The official name of the Authority shall be the "California Community Choice Financing Authority."

Section 1.2 Board Members. The Authority shall be administered by a board of directors (the "Board") whose members (the "Directors") shall be as set forth in Article IV of the Joint Powers Agreement, dated June 25, 2021 (the "Agreement"). Directors shall, to the extent required by law, comply with the requirements of the California Political Reform Act, as amended from time to time, the provisions of the Joint Exercise of Powers Act, as amended from time to time, and any other requirements applicable to members of the governing body of a joint powers authority.

Section 1.3 Office and Place of Meetings. The business office of the Authority shall be at 1125 Tamalpais Avenue, San Rafael, California 94901 or at such other place as may be designated by resolution by the Board. Regular meetings shall be held at 1125 Tamalpais Avenue, San Rafael, California 94901 or at such other place as the Board may designate.

ARTICLE II - OFFICERS

Section 2.1 Officers. The Officers of the Authority shall be the Chair, Vice Chair, Treasurer/Controller, and Secretary. The Officers of the Authority may also include a General Manager.

Section 2.2 Chair and Vice Chair. The Chair and Vice Chair of the Authority shall be elected by the Board. The term of office for the respective officers shall be from the date of his or her election as Chair or Vice Chair through the date of the first regular meeting of the Authority in the second succeeding calendar year following such election: provided, that each person shall serve until a successor has been duly elected. The Chair shall preside at all meetings of the Authority. If the Chair is absent, then the Vice Chair shall act in the Chair's place.

Section 2.3 General Manager. A General Manager may be appointed by the Board and may, but need not, be a Director. The General Manager shall submit such information and recommendations to the Board as he or she may consider proper concerning the business, policies and affairs of the Authority. Except as otherwise specified by resolution of the Board, the General Manager or the General Manager's designee shall have the power to sign all contracts, deeds and other instruments executed by the Authority, shall have the power to direct employees, borrowed or seconded staff and consultants in implementing policy set by the Board, and shall have the power to perform all duties incident to the office or delegated by the Board. The General Manager may designate one or more officers of the Authority or employees of the Authority to act as his or her designee in exercising the power and performing the duties of the General Manager.

Section 2.4 Secretary. The Secretary shall be appointed by the Board, and such Secretary may, but need not, be a Director. The Secretary shall keep the records of the Authority, shall act as Secretary of the meetings of the Authority and record all votes, and shall keep a record of the proceedings of the Authority in a journal of proceedings to be kept for such purpose, and shall perform all duties incident to the office.

Section 2.5 Treasurer/Controller. The Treasurer/Controller shall be appointed by the Board, and may, but need not, be a Director. The Treasurer/Controller shall perform the duties set forth in the Agreement. The Treasurer/Controller may submit such information and recommendations to the Board as he or she may consider proper concerning the business, policies and affairs of the Authority. The Treasurer/Controller shall be responsible for preparation and submission of any reports required to be provided to holders of the Authority's Bonds (as such term is defined in Section 1.05 of the Agreement) pursuant to any continuing disclosure undertakings entered into by the Authority. Except as otherwise specified by resolution of the Board, the Treasurer/Controller or the Treasurer/Controller's designee shall have the power to sign all contracts, deeds and other instruments executed by the Authority, shall have the power to direct employees, borrowed or seconded staff and consultants in implementing policy set by the Board,

and shall have the power to perform all duties incident to the office or delegated by the Board. The Treasurer/Controller may designate one or more officers of the Authority or employees of the Authority to act as his or her designee in exercising the power and performing the duties of the Treasurer/Controller.

Section 2.6 Election of Officers. Election of officers shall be the first order of business at the first regular meeting of the Authority held in every second calendar year; provided, that failure to elect any or all officers at such meeting shall not affect the title to office of any officer duly elected and then holding office as of such meeting.

Section 2.7 Authority to Bind Authority. No Director, officer, agent or employee of the Authority, without prior specific or general authority by a vote of the Board, shall have any power or authority to bind the Authority by any contract, to pledge its credit, or to render it liable for any purpose in any amount.

ARTICLE III - MEETINGS

Section 3.1 Regular Meetings. The Board shall hold at least one regular meeting each year, and, by resolution, may provide for the holding of regular meetings at more frequent intervals in accordance with the provisions of Section 54956 of the Government Code of the State of California. Regular meetings shall be held as set forth in Section 1.3, on dates and at times as fixed by resolution of the Authority and at such places as are determined by the Board. If at any time any regular meeting falls on a legal holiday, such regular meeting shall be held on the next business day at the same time.

All meetings of the Board shall be called, noticed, held and conducted subject to the provisions of the Ralph M. Brown Act (Chapter 9 of Part I of Division 2 of Title 5 of the Government Code of the State of California (Sections 54950-54961)), as supplemented and amended, or any successor legislation hereafter enacted, and other applicable law.

The Secretary of the Authority shall cause minutes of all meetings of the Board, both special and regular, to be kept and shall cause a copy of the minutes to be forwarded promptly to each Director.

Section 3.2 Special Meetings. A special meeting may be called in accordance with the provisions of Sections 54956 and 54956.5 of the Government Code of the State of California, as amended.

Section 3.3 Closed Sessions. Nothing contained in these Bylaws shall be construed to prevent the Board from holding closed sessions during a regular or special meeting concerning any matter permitted by law to be considered in a closed session.

Section 3.4 Public Hearings. All public hearings held by the Board shall be held during regular or special meetings of the Board.

Section 3.5 Adjourning Meetings and Continuing Public Hearings to Other Times or Places. Any public hearing being held, or any hearing noticed or ordered to be held at any meeting, may by order or notice of continuance be continued or re-continued to any subsequent meeting in the same manner and to the same extent set forth herein for the adjournment of the meetings: provided, that if the hearing is continued to a time less than 24 hours after the time specified in the order or notice of hearing a copy of the order or notice of continuance shall be posted immediately following the meeting at which the order or declaration of continuance was adopted or made.

Section 3.6 Meetings to be Open and Public. All meetings of Directors to take action or to deliberate concerning Authority business and its conduct shall be open and public and all persons shall be permitted to attend any such meetings, except as otherwise provided or permitted by law, including as permitted by Section 3.3 of these Bylaws.

Section 3.7 Quorum, Voting Requirements, and Manner of Action. A quorum of the Board, the minimum voting thresholds for actions of the Board, and the manner in which the Board may act shall be as set forth in Article V of the Agreement.

Section 3.8 Parliamentary Procedure. The rules of parliamentary procedure set forth in Robert's Rules of Order shall govern all meetings of the Authority, except as otherwise herein provided.

ARTICLE IV - MISCELLANEOUS

Section 4.1 Statements of Economic Interest. Each Director shall comply with the Authority's Conflict of Interest Code, fully respond to all requests from Authority staff in regard to conflict of interest issues that may arise and timely submit all applicable forms, including Statements of Economic Interest (Form 700), Assuming, Annual, and Leaving Office Statements with the Secretary. The Secretary shall make and retain copies of these forms in compliance with applicable law and the Authority's Conflict of Interest Code.

Section 4.2 No Reimbursement for Travel Expenses. Directors, officers, and employees shall not be reimbursed by the Authority for any travel expenses incurred by those persons in attending events, meetings, and conferences on behalf of the Authority. Non-reimbursable travel expenses shall include all charges for meals, lodging, airfare, and costs of travel by automobile.

Notwithstanding the foregoing, the Board may vote to permit reimbursement of any such reasonable and necessary travel expenses incurred for Directors, officers, or employees to attend non-Authority events, meetings, and conferences, only if that person's sole purpose is to attend on behalf of the Authority. "Reasonable and necessary" travel expenses, with respect to any Director, shall be only those expenses which the Director would not have incurred in performing the normal business of the Founding Member (as defined in Section 1.08 of the Agreement) that appointed such Director. The Treasurer/Controller, upon approval of the Board, shall be authorized to pay all such expenses deemed reasonable and necessary so long as sufficient funds have been budgeted therefor.

Section 4.3 Bonds and Other Indebtedness. The Authority may issue or incur Bonds (as such term is defined in Section 1.05 of the Agreement) in accordance with Article VII of the Agreement, and such Bonds shall not constitute general obligations of the Authority or a debt, liability or obligation of any of the Members (as such term is defined in Section 1.10 of the Agreement), but shall be payable solely from the moneys pledged to the payment of principal of or interest on such Bonds under the terms of the resolution, indenture, trust agreement or other instrument pursuant to which the Bonds are issued or incurred.

ARTICLE V - AMENDMENTS

Section 5.1 Amendments to Bylaws. These Bylaws may be amended by the Authority at any regular or special meeting by majority vote of the Board, provided, that the proposed amendment to any particular section is included in the notice of such meeting.

CA COMMUNITY CHOICE FINANCING AUTHORITY

CONFLICT-OF-INTEREST CODE

The Political Reform Act (Government Code Section 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict-of-interest codes. The Fair Political Practices Commission has adopted a regulation (2 California Code of Regulations Section 18730) that contains the terms of a standard conflict-of-interest code, which can be incorporated by reference in an agency's code. After public notice and hearing, the standard code may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the attached Appendix (or Appendices), designating positions and establishing disclosure categories, shall constitute the conflict-of-interest code of the **CA Community Choice Financing Authority** (**Authority**).

Officials and employees holding positions listed in this code must file their statements of economic interests electronically with the **Fair Political Practices Commission**. All statements must be made available for public inspection and reproduction under Government Code Section 81008.

APPENDIX A
Designated Positions

DESIGNATED POSITIONS	DISCLOSURE CATEGORIES
Member, Board of Directors of CCCFA	1, 2, 3, 4
General Counsel	1, 2, 3, 4
Consultants/New Positions *	

*Consultants and new positions shall be included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code subject to the following limitation:

The Chair of the Board of Directors or General Manager, may, in consultation with the CCCFA General Counsel, determine in writing that a particular consultant or new position is hired to perform a range of duties that is limited in scope and thus, is not required to comply with the disclosure requirements described in these categories. Such written determination shall include a description of the consultant's or new position's duties and based upon that description of the consultant's or new position's duties and, bnased upon that description, a statement of the extent of disclosure requirements. The determination is a public record and shall be retained for public inspection in the same manner and location of this conflict-of-interest code. (Gov. Code Sec. 81008)

PUBLIC OFFICIALS WHO MANAGE PUBLIC INVESTMENTS:

The following positions are not covered by this conflict-of-interest code because they must file under Government Code Section 87200 and, therefore, are listed for informational purposes only:

- Treasurer/Controller
- General Manager

An individual holding one of the above listed positions may contact the Fair Political Practices Commission for assistance or written advice regarding their filing obligations if they believe that their position has been categorized incorrectly. The Fair Political Practices Commission makes the final determination whether a position is covered by section 87200.

APPENDIX B
Disclosure Categories

Designated positions must report financial interests in accordance with the assigned disclosure categories.

Category 1: Investments and business positions in business entities, and sources of income, including the receipt of loans, gifts, and travel payments, from entities, that provide services (including, but not limited to, consulting services), supplies, materials, machinery, or equipment of the type utilized by the Authority.

Category 2: Interests in real property located within the jurisdiction or within two miles of the boundaries of the jurisdiction or within two miles of any land owned or used by the Authority, including any leasehold, beneficial or ownership interest or option to acquire such interest in real property.

Category 3: Investments and business positions in business entities, and sources of income, including the receipt of gifts, loans, and travel payments, from entities that are public or private electric utility companies or other companies wich supply power to the Authority.

Category 4: Investments and business positions in business entities, and income, including the receipt of gifts, loans and travel payments, from business entities that design, build, manufacture, sell, distribute or service equipment of the type that is either presently utilized by electric power suppliers or that is used by the federal, state, or local government or by private industry in research designed to refine or develop new methods of electrical power generation.

This is the last page of the conflict of interest code for the CA Community Choice Financing Authority.

CERTIFICATION OF FPPC APPROVAL

Pursuant to Government Code Section 87303, the conflict of interest code for the CA Community Choice Financing Authority was approved on 11/27/23.

This code will become effective on 12/27/23.

Sukhi K. Brar
Assistant Chief Counsel
Fair Political Practices Commission

SAN DIEGO COMMUNITY POWER
Staff Report - Item 5

To:	Finance Risk and Management Committee
From:	Jack Clark, Chief Operating Officer Lucas Utouh, Senior Director of Data Analytics & Customer Operations Aaron Lu, Rates and Strategy Manager Pete Polonsky, Senior Rates Analyst
Via:	Karin Burns, Chief Executive Officer
Subject:	Update on 2026 Projected Community Power Rates
Date:	March 19, 2026

Recommendation

Receive and file an update on 2026 projected Community Power Rates.

Background

On January 15, 2026, the Board of Directors of San Diego Community Power (Community Power) reviewed and approved 2026 Community Power rates effective retroactively as of January 1, 2026. The aforementioned 2026 Community Power rates included Community Power default PowerOn service electricity generation/commodity rates that are 4% cheaper compared to San Diego Gas and Electric's (SDG&E) generation rates and PowerBase service electricity generation rates that are 10% cheaper than SDG&E's generation rates effective as of January 1, 2026; with Power100 and Power100 Green-e Certified (Green-e Plus) maintaining premiums of $0.01/kWh and $0.02/kWh, respectively, compared to PowerOn.

On March 2, 2026, SDG&E filed Advice Letter 4791-E for the implementation of their 2024 General Rate Case (GRC) Phase 2 and Track 2 Wildfire Mitigation Costs for electric rates effective April 1, 2026. This Advice Letter contains updates to SDG&E's bundled commodity/generation and the Power Charge Indifference Adjustment (PCIA) rates. Both SDG&E bundled generation and PCIA rates play a role in Community Power's rate setting process, particularly as it relates to Community Power's competitiveness.

Analysis and Discussion

Rate Development Process

Community Power's Board of Directors is responsible for setting the electric generation rates for Community Power's customers. The Chief Executive Officer is responsible for developing proposed rates that are sufficient to recover operational expenses, for the Board to consider before finalization. For Community Power to continue being fiscally sustainable, the agency's commodity/generation rates should, at a minimum, meet the annual revenue requirements developed, including any reserves or coverage requirements set forth in policy and/or loan covenants/debt service while remaining competitive to the extent possible in comparison to SDG&E.

The Board has the flexibility to consider rate adjustments, provided that the overall revenue requirement is achieved. In alignment with the Rate Development Policy, adopted by the Board of Directors on November 17, 2022,[1] Community Power considers the following objectives in its rate setting framework:

- Cost Recovery,
- Reserves,
- Rate Competitiveness and Customer Value,
- Rate Stability,
- Equity Among Customers,
- Rate Structure Simplicity and Comparability,
- Transparency,
- Avoidance of Cost Shifting, and
- Cost of Service.

Additionally, per previous Board direction, staff will, if possible, recommend rates that remain competitive with SDG&E service.

It is important to note that rates are made up of several components, only one of which Community Power has control over (i.e., Community Power's generation rate). The chart below is an illustrative example of rate tariff composition for a residential customer on TOU-DR-1 to illustrate the various components that affect rates and make up a total customer bill.[2] Staff track the changes to the PCIA rate, as it is the above market cost of power associated with SDG&E's portfolio that both SDG&E's bundled customers and Community Power's

[1] See https://sdcommunitypower.org/wp-content/uploads/2023/02/2022-12-Rate-Development-Policy.pdf.

[2] See https://www.sdge.com/sites/default/files/SDCP_SDGE%20JRC%2006.01.2025_Final.pdf for Community Power and SDG&E's Joint Rate Comparisons, which provide this table for each tariff.

customers, who have departed SDG&E's generation service, pay and can affect Community Power's competitiveness. "Above-market cost" refers to expenditures for generation resources that cannot be fully recovered through sales of these resources at current market prices.

TOU-DR-1	SDG&E (41% RPS)	Community Power Service Options		
Residential		PowerBase (45% RPS)	PowerOn (53% RPS + 2% Carbon Free)	Power100 (100% RPS)
Generation ($)	$41.80	$41.09	$44.55	$47.96
PCIA ($)	$16.97	$12.13	$12.13	$12.13
Franchise Fees ($)	$1.20	$1.20	$1.20	$1.20
Total Generation ($)	**$59.97**	**$54.42**	**$57.88**	**$61.29**
Delivery ($)	$104.72	$104.71	$104.71	$104.71
Average Monthly Bill ($)	**$164.69**	**$159.13**	**$162.59**	**$166.00**

Assumptions:
Rates as of January 1, 2026.
Average monthly usage of 341 kWh.
2021 PCIA vintage.
Renewable Portfolio Standards (RPS) content based on most recent 2024 Power Content Label.

Rate Update Timeline

Community Power, like most Community Choice Aggregators (CCAs), usually adjusts rates annually and/or in response to utility rate adjustments. SDG&E already adjusted their rates per the regularly planned January 1, 2026, consolidated rate adjustment. As articulated in SDG&E's Advice Letter 4791-E, a second rate adjustment is expected to occur on April 1, 2026, to incorporate rate design changes approved by the California Public Utilities Commission (CPUC) within SDG&E's General Rate Case (GRC) Phase 2. Community Power staff are reviewing these changes to decide whether Community Power needs to make rate design adjustments to align with SDG&E's adjustments.

If a rates adjustment is proposed, the schedule would be as follows:

- March 2, 2026: SDG&E filed its advice letter on its GRC Phase 2 rate design changes, including time-of-use adjustments and the creation of a new medium commercial customer class.

- March 26, 2026: Community Power staff brings rate recommendations before the Board for review and approval as of April 1, 2026.

- April 1, 2026: SDG&E and Community Power implement revised rates.

April 1, 2026, Rate Changes

SDG&E's April 1, 2026, rate adjustment is for implementing changes adopted from SDG&E's most recent GRC Phase 2. The most impactful changes include creation of a new Medium Commercial customer class from the existing Small Commercial and Large Commercial and Industrial customer classes, updating the revenue that needs to be collected from each customer class, and expanding the Time-Of-Use (TOU) super off-peak period to all year.

Other changes include aligning how the low-income discount is applied to commercial customers with the same methodology for residential customers, medical baseline discount adjustment, annual increase to commercial monthly service fees, and various updated delivery rates. Lastly, SDG&E will also be increasing delivery rates to collect $589 million in wildfire-related costs.

April 1, 2026, Bundled Generation & PCIA Rate Projections

Based on SDG&E's most recent March 2 advice letter filing to implement April 1, 2026, rates, the projected bundled system average generation rates are expected to remain relatively unchanged. Any customer class specific changes are driven by the creation of a new medium commercial customer class and the updated revenue allocation between customer classes per SDG&E's GRC Phase 2 settlement.

April 1, 2026, SDG&E bundled generation rate change projections are articulated in the table below.

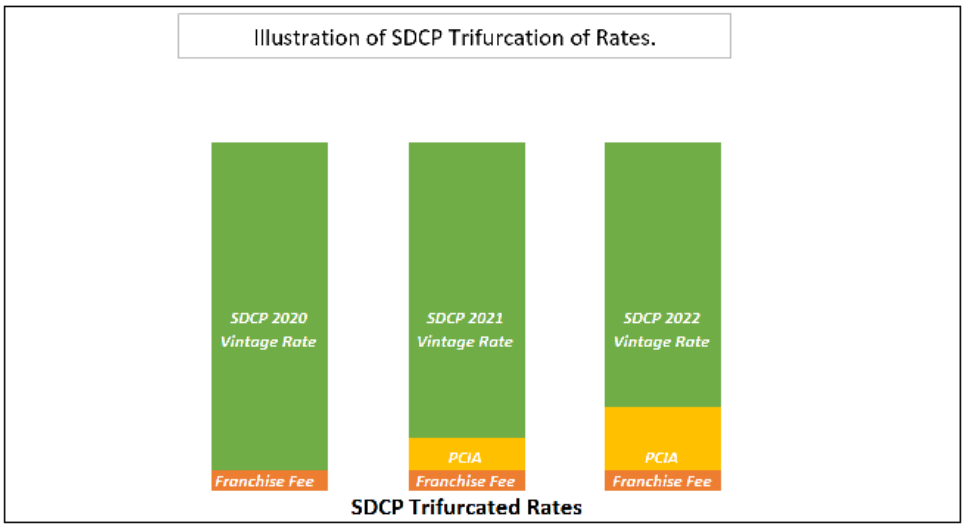
	SDG&E Generation Rate ($/kWh)		**SDG&E Avg. Generation Rate Change (%)**
Customer Class	1/1/2026	4/1/2026	1/1/2026 - 4/1/2026
Residential	0.17532	0.17549	0.10%
Small Commercial	0.15391	0.15665	1.78%
Med Commercial	N/A	0.18251	N/A
Large C&I	0.19278	0.19193	-0.44%
Agricultural	0.13041	0.12009	-7.91%
Lighting	0.11994	0.11981	-0.11%
System Total	**0.17676**	**0.17657**	**-0.11%**

Based on SDG&E's Advice Letter Advice Letter 4791-E, Community Power is expected to see an increase in PCIA rates for all vintages relevant to its Large Commercial and Industrial customers, including Vintage Year 2020 (Phase 1 & 2 customers), Vintage Year 2021 (Phase 3 customers), and Vintage Year 2022 (Phase 4 customers). PCIA rates for Small Commercial and Agricultural customers are expected to decrease for all vintages. Vintaging denotes the year during which SDG&E recognizes the transition of Community Power customers from bundled service into Community Power service and creates a mechanism for the assessment of the PCIA rate.

Next Steps

Staff are currently conducting a comprehensive analysis and will bring a rate recommendation to Community Power Board for review and adoption at the March 26, 2026 meeting that both meets the revenue and prudent reserve needs of Community Power as well as maintains value for our customers.

As a result of the material deltas expected between PCIA rates for Vintage Years 2020, 2021, and 2022, staff will also recommend the Board to continue to trifurcate three sets of rates. This trifurcation will maintain a fair, equitable, and balanced rate structure that does not create winners and losers across our customers with differing vintage years as illustrated below.



Fiscal Impact

N/A

Strategic Plan

This activity supports the strategic plan goals of (1) evolving rate strategy to ensure competitiveness, affordability, and fiscal sustainability, and (2) developing customer strategies to increase retention and engagement.

Attachments

N/A

SAN DIEGO COMMUNITY POWER

SAN DIEGO COMMUNITY POWER
Staff Report – Item 6

To:	Finance and Risk Management Committee
From:	Karin Burns, Chief Executive Officer
Subject:	Announcement of Investment Grade Credit Rating from S&P Global Ratings
Date:	March 19, 2026

Recommendation

Receive and file staff report acknowledging San Diego Community Power's "A" Issuer Credit Rating with a Stable Outlook from S&P Global Ratings.

Background

Standard & Poor's (S&P) Global Ratings is a nationally recognized credit rating agency that provides independent, forward-looking opinions on the creditworthiness of public agencies and other debt issuers. A credit rating reflects S&P's assessment of an entity's ability and willingness to meet its financial obligations based on financial performance, management practices, and economic conditions. For public agencies, an investment-grade credit rating is important because it enhances credibility with counterparties, investors, expands access to capital markets, and can reduce borrowing costs and improve financial flexibility when issuing debt or entering long-term financial commitments.

Analysis and Discussion

Overview of the Credit Rating

S&P Global Ratings assigned Community Power an "A" Issuer Credit Rating with a Stable Outlook, reflecting S&P's view of Community Power's strong enterprise profile, solid financial metrics, and supportive governance framework. The Stable Outlook indicates S&P's expectation that Community Power will maintain credit characteristics consistent with the "A" category over the intermediate term.

This rating places Community Power firmly within the upper-medium investment-grade category, comparable to other highly rated California Community Choice Aggregators (CCAs) and public power utilities.

S&P's Rationale for the "A / Stable" Rating

S&P's published report and analysis identify several key drivers supporting Community Power's strong credit quality:

1. Large, Diverse, and Economically Resilient Service Territory
S&P cites Community Power's service to nearly 950,000 customer accounts across San Diego County, with no material customer concentration and exposure to a large, diverse metropolitan economy. This scale provides revenue stability and mitigates single-customer risk.

2. Strong Governance and Management Practices
S&P characterizes Community Power's governance as credit-supportive, noting its joint powers authority structure, autonomous rate-setting authority, comprehensive policies, long-term planning practices, and experienced management team.

3. Financial Performance and Liquidity
S&P's analysis reflects Community Power's strong liquidity position, absence of long-term debt at the time of initial rating, and projected financial metrics that align with the "A" category, including fixed-cost coverage and cash-to-operations measures.

4. Resource Portfolio and Climate Risk Profile
S&P notes Community Power's predominantly carbon free power portfolio, limited direct exposure to wildfire liability due to lack of ownership of transmission and distribution assets, and long-term plan to achieve 100% renewable energy by 2035. These factors reduce long-term transition and environmental risk.

5. Rate and Customer Considerations
S&P acknowledges constraints on rate-raising flexibility due to customer affordability considerations but views Community Power's planning, reserves, and governance as sufficient to manage these pressures within the current rating category.

Fiscal Impact

Immediate interest expense savings through the reduction or elimination of approximately $27 million in standby letter of credit collateral obligations. In addition, a public investment grade credit rating provides Community Power a stronger position in energy market negotiations by expanding the pool of counterparties willing to extend favorable credit terms, enhancing Community Power's leverage in negotiating long-term renewable contracts, and reducing supplier price-adders tied to perceived counterparty credit risk.

Strategic Plan

Achieves Community Power's Strategic Objective of obtaining a public investment grade credit rating by November 2027. The public "A / Stable" credit rating also directly advances Community Power's strategic objectives by:

- Enhancing financial credibility and transparency with customers, regulators, and partners
- Supporting competitive energy procurement and cost containment
- Strengthening Community Power's capacity to invest in clean energy, reliability, and customer programs
- Reinforcing Community Power's role as a financially sound, mission-driven public power agency

The rating validates Community Power's governance, financial discipline, and long-term planning approach and positions the agency for continued growth and resilience.

Attachments

A: S&P Global Ratings – San Diego Community Power, CA: Assigned "A" Issuer Credit Rating; Outlook Stable (March 9, 2026)

ITEM 6
ATTACHMENT A

San Diego Community Power, CA Assigned 'A' Issuer Credit Rating; Outlook Stable

March 9, 2026

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- S&P Global Ratings assigned its 'A' issuer credit rating (ICR) to San Diego Community Power (SDCP), Calif.
- The outlook is stable.

ENGLEWOOD (S&P Global Ratings) March 9, 2026--S&P Global Ratings today took the rating actions listed above.

We believe SDCP's climate transition risk exposure is low, based on its predominantly carbon-free resource portfolio. In calendar 2024, the fuel mix of the CCA's standard offering was 53% eligible renewables (34% solar, 12% wind, and 7% biomass and biowaste), 2% large hydroelectric, and 45% unspecified. SDCP plans for its fuel mix to be 100% from renewable resources by 2035. In our view, SDCP has limited direct exposure to wildfires through California's strict liability standard and inverse condemnation given the absence of ownership of transmission and distribution assets. However, if the infrastructure of the incumbent IOU that provides transmission and distribution service to the CCA is implicated in contributing to a wildfire, we anticipate that liability costs will be socialized across the IOU's and the CCA's customers, which could impair ratemaking flexibility.

We believe SDCP has exposure to social capital factors. The CCA's weighted-average rate of about 150% of the state average is elevated, reducing rate-raising flexibility, particularly given the CCA's elevated percentage of delinquent accounts. Because of the high unpredictability of federal policy--along with the economy's stressors and the associated financial pressures consumers are facing--we are monitoring the strength and stability of utilities' revenue streams for evidence of delinquent payments or other revenue erosion (see: "Economic Outlook U.S. Q1 2026: Steady As She Goes But On A Narrow Path," Nov. 24, 2025).

We view SDCP's governance structure and risk management as credit-supportive, given the CCA has robust JPA member agreements, full rate-setting autonomy, comprehensive policies and planning, and a sophisticated management team. SDCP has an energy risk management policy, which includes scenario and stress testing, and conservative power supply planning practices, being largely hedged for its forecast load for the next several months. In the next few years, most of SDCP's power supply will be sourced from long-term, fixed-price power supply contracts.

The stable outlook reflects our expectation that SDCP's rates will remain competitive with the incumbent IOU, which will enable the CCA to sustain its large customer base. We also believe that SDCP's significant available reserves will remain healthy, providing flexibility to meet financial obligations.

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We could lower the rating if SDCP's power supply costs increase, potentially either pressuring the CCA's rate competitiveness and/or reducing unrestricted reserves, depending on management's actions. In case of material customer defection away from the CCA, SDCP could be forced to sell surplus contracted power to the market. In the event market prices decrease to a level significantly below that of the CCA's portfolio, SDCP could face significant financial pressure, which may lead us to lower the rating. In addition, if the CCA's FCC is near 1x on a sustained basis, there would be pressure on the rating. We could also lower the rating if delinquent accounts impair cash flow and liquidity.

We do not expect to raise the rating in the next two years given the inherent risks posed by the direct competition for SDCP's entire retail customer base and the elevated delinquencies at the CCA. However, if the CCA's operations result in significant competitive advantages relative to the incumbent IOU over the next several years, while SDCP's FCC materially exceeds forecasts on a sustained basis, we could raise the rating.

Certain terms used in this report, particularly certain adjectives used to express our view on rating relevant factors, have specific meanings ascribed to them in our criteria, and should therefore be read in conjunction with such criteria. Please see Ratings Criteria at https://disclosure.spglobal.com/ratings/en/regulatory/ratings-criteria for further information. A description of each of S&P Global Ratings' rating categories is contained in "S&P Global Ratings Definitions" at https://disclosure.spglobal.com/ratings/en/regulatory/article/-/view/sourceId/504352. Complete ratings information is available to RatingsDirect subscribers at www.capitaliq.com. All ratings referenced herein can be found on S&P Global Ratings' public website at www.spglobal.com/ratings.

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Glossary

AB – Assembly Bill: An Assembly Bill is a piece of legislation that is introduced in the Assembly. In other words, the Assembly (rather than the Senate) is the bill's house of origin in the Legislature. In California, it is common for legislation to be referred to by its house of origin number even after it becomes law. However, because bill numbers "reset" and start again from 1 in each legislative session, it is less confusing to include chapter and statute information
when referring to a bill that has become law; for example, SB 350 (Chapter 547, Statutes of 2015).

AL - Advice Letter: An Advice Letter is a request by a California Public Utilities Commission (CPUC) jurisdictional entity for Commission approval, authorization or other relief.

ALJ – Administrative Law Judge: ALJs preside over CPUC cases to develop the evidentiary record and draft proposed decisions for Commission action.

ARB – Air Resources Board: The California Air Resources Board (CARB or ARB) is the "clean air agency" in the state government of California. CARB is charged with protecting the public from the harmful effects of air pollution and developing programs and actions to fight climate change.

AReM – Alliance for Retail Energy Markets: AReM is a not-for-profit corporation that advocates for continued development of successful customer choice in retail energy markets and provides a focused voice for competitive energy retailers and their customers in select public policy forums at the state level. It represents direct access providers such as Constellation NewEnergy and Direct Energy.

BayREN – Bay Area Regional Energy Network: BayREN offers regionwide energy programs, services and resources to members of the public by promoting energy efficient buildings, reducing carbon emissions and building government capacity.

CAISO – California Independent System Operator: CAISO is a nonprofit public benefit corporation that oversees the operation of the California bulk electric power system, transmission lines and electricity market generated and transmitted by its members (approximately 80% of California's electric flow). Its stated mission is to "operate the grid reliably and efficiently, provide fair and open transmission access, promote environmental stewardship and facilitate effective markets and promote infrastructure development." CAISO is regulated by the Federal Energy Regulatory Commission (FERC) and governed by a five-member governing board appointed by the governor.

CalCCA – California Community Choice Association: CalCCA is a statewide association, made up of Community Choice Aggregators (CCAs), that represents the interests of California's community choice electricity providers.

CALSEIA – California Solar Energy Industries Association: CALSEIA represents more than 200 companies doing solar-related business in California, including manufacturers, distributors, installation contractors, consultants and educators. Members' annual dues support professional staff and a lobbyist who represents the common interests of California's solar industry at the Legislature, Governor's Office and state and local agencies.

CALSLA – California City-County Street Light Association: CALSLA is a statewide association representing cities, counties and towns before the CPUC that is committed to maintaining fair and equitable streetlight electricity rates and facilities charges and disseminating streetlight-related information.

CAM – Cost Allocation Mechanism: CAM is the cost recovery mechanism to cover procurement costs incurred in serving the central procurement function.

CARB – California Air Resources Board: The CARB is charged with protecting the public from the harmful effects of air pollution and developing programs and actions to fight climate change in California.

CARE – California Alternative Rates for Energy: CARE is a state program for low-income households that provides a 30% discount on monthly energy bills and a 20% discount on natural gas bills. It is funded through a rate surcharge paid by all other utility customers.

CBE – Communities for a Better Environment: CBE is an environmental justice organization that was founded in 1978. The mission of CBE is to build people's power in California's communities of color and low-income communities to achieve environmental health and justice by preventing and reducing pollution and building green, healthy and sustainable communities and environments.

CCA – Community Choice Aggregator: A community choice aggregator, sometimes referred to as community choice aggregation, is an entity of local governments that procure power on behalf of their residents, businesses and municipal accounts from an alternative supplier while still receiving transmission and distribution service from their existing utility provider. CCAs are an attractive option for communities that want more local control over their electricity sources, more green power than is offered by the default utility, and/or lower electricity prices. By aggregating demand, communities gain leverage to negotiate better rates with competitive suppliers and choose greener power sources.

CCSF – City and County of San Francisco: The City and County of San Francisco often engage in joint advocacy before the CPUC. San Francisco operates CleanPowerSF, a CCA.

CEC – California Energy Commission: The CEC is the primary energy policy and planning agency for California, whose core responsibilities include advancing state energy policy, achieving energy efficiency, investing in energy innovation, developing renewable energy, transforming transportation, overseeing energy infrastructure and preparing for energy emergencies.

CEE – Coalition for Energy Efficiency: CEE is a nonprofit composed of U.S. and Canadian energy-efficiency administrators working together to accelerate the development and availability of energy-efficient products and services.

CLECA – California Large Energy Consumers Association: CLECA is an organization of large, high-load factor industrial customers located throughout the state; its members are in the cement, steel, industrial gas, pipeline, beverage, cold storage, food packaging and mining industries and their electricity costs comprise a significant portion of their costs of production. Some members are bundled customers, others are Direct Access (DA) customers, and some are served by Community Choice Aggregators (CCAs); a few members have onsite renewable generation.

CPUC – California Public Utility Commission: The CPUC is a state agency that regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit and passenger transportation companies, in addition to authorizing video franchises.

C&I – Commercial and Industrial: C&I customers are business customers who generally consume much higher volumes of electricity and gas. Many utilities segment their C&I customers by energy consumption (small, medium and large).

CP – Compliance Period: A Compliance Period is the time period to become Renewables Portfolio Standard (RPS) compliant, set by the California Public Utilities Commission (CPUC).

DA – Direct Access: Direct Access is an option that allows eligible customers to purchase their electricity directly from third-party providers known as Electric Service Providers (ESPs).

DA Cap: The DA Cap is the maximum amount of electric usage that may be allocated to Direct Access customers in California or, more specifically, within an investor-owned utility service territory.

DACC – Direct Access Customer Coalition: DACC is a regulatory advocacy group composed of educational, governmental, commercial and industrial customers that utilize direct access for all or a portion of their electrical energy requirements.

DA Lottery: The DA Lottery is a random drawing by which DA waitlist customers become eligible to enroll in DA service under the currently applicable Direct Access Cap.

DA Waitlist: The DA Waitlist consists of customers that have officially registered their interest in becoming a DA customer but are not yet able to enroll in service because of DA cap limitations.

DAC – Disadvantaged Community: "Disadvantaged communities" refers to the areas throughout California that most suffer from a combination of economic, health and environmental burdens. These burdens include poverty, high unemployment, air and water pollution and the presence of hazardous wastes as well as high incidences of asthma and heart disease. One way that the state identifies these areas is by collecting and analyzing information from communities statewide. CalEnviroScreen, an analytical tool created by the California Environmental Protection Agency (CalEPA), combines different types of census tract-specific information into a score to determine which communities are the most burdened or "disadvantaged."

DASR – Direct Access Service Request: DASR is a request submitted by C&I customers to become direct access eligible.

Demand: Demand refers to the rate at which electric energy is delivered to or by a system or part of a system, generally expressed in kilowatts (kW), megawatts (MW) or gigawatts (GW), at a given instant or averaged over any designated interval of time. Demand should not be confused with Load or Energy.

DER – Distributed Energy Resource: A DER is a small-scale physical or virtual asset (e.g., EV charger, smart thermostat, behind-the-meter solar/storage, energy efficiency) that operates locally and is connected to a larger power grid at the distribution level.

Distribution: Distribution refers to the delivery of electricity to the retail customer's home or business through low-voltage distribution lines.

DLAP – Default Load Aggregation Point: In the CAISO's electricity optimization model, DLAP is the node at which all bids for demand should be submitted and settled.

DR – Demand Response: DR is an opportunity for consumers to play a significant role in the operation of the electric grid by reducing or shifting their electricity usage during peak periods in response to time-based rates or other forms of financial incentives.

DRP – Distributed Resource Plans: Distributed Resource Plans are required by statute and intended to identify optimal locations for the deployment of distributed resources.

DWR – Department of Water Resources: DWR is the state agency charged with managing California's water resources, systems and infrastructure in a responsible, sustainable way.

ECR – Enhanced Community Renewable: ECR is an IOU (Investor-Owned Utility) program that reflects the "Community Solar" model of renewable energy purchasing. Customers sign up to purchase a portion of a local solar project directly from a developer at a level that meets at least 25% and up to 100% of their monthly electricity demand. The customer pays the developer for the subscribed output and receives a credit on their utility bill that reflects their enrollment level.

ED – Energy Division: The CPUC's Energy Division develops and administers energy policy and programs to serve the public interest, advise the Commission and ensure compliance with Commission decisions and statutory Mandates.

EE – Energy Efficiency: Energy Efficiency refers to the use of less energy to perform the same task or produce the same result. Energy-efficient homes and buildings use less energy to heat and cool and run appliances and electronics, and energy-efficient manufacturing facilities use less energy.

ELCC – Effective Load Carrying Capacity: ELCC is the additional load met by an incremental generator while maintaining the same level of system reliability. For solar and wind resources, the ELCC is the amount of capacity that can be counted for Resource Adequacy purposes.

EPIC – Electric Program Investment Charge: The EPIC program was created by the CPUC to support investments in clean energy technologies that provide benefits to the electricity ratepayers of Pacific Gas and Electric (PG&E), San Diego Gas & Electric Company (SDG&E) and Southern California Edison Company (SCE).

ERRA – Energy Resource Recovery Account: ERRA proceedings are used to determine fuel and purchased power costs that can be recovered in rates. The utilities do not earn a rate of return on these costs and recover only actual costs. The costs are forecast for the year ahead. If the actual costs are lower than forecast, then the utility gives money back, and vice versa.

ES – Energy Storage: Energy Storage is the capture of energy produced at one time for use at a later time to reduce imbalances between energy demand and energy production.

ESA – Energy Storage Agreement: An ESA refers to a battery services contract, a capacity contract, demand response contract or similar agreement.

ESP – Energy Service Provider: An Energy Service Provider is an energy entity that provides service to a retail or end-use customer.

EV – Electric Vehicle: An EV is a vehicle that uses one or more electric motors for propulsion.

FCR – Flexible Capacity Requirements: "Flexible capacity need" is defined as the quantity of resources needed by the CAISO to manage grid reliability during the greatest three-hour continuous ramp in each month. Resources will be considered as "flexible capacity" if they can sustain or increase output or reduce ramping needs during the hours of "flexible need." FCR means the flexible capacity requirements established for LSEs by the CPUC pursuant to the CPUC decisions.

GHG – Greenhouse gas: Water vapor, carbon dioxide, tropospheric ozone, nitrous oxide, methane and chlorofluorocarbons (CFCs) are gases that cause the atmosphere to trap heat radiating from the earth. The most common GHG is carbon dioxide.

GRC – General Rate Case: General Rate Cases are proceedings used to address the costs of operating and maintaining the utility system and the allocation of those costs among customer classes. For California's three large IOUs, the GRCs are parsed into two phases. Phase I of a GRC determines the total amount the utility is authorized to collect, while Phase II determines the share of the cost each customer class is responsible for and the rate schedules for each class. Each large electric utility files a GRC application every three years for review by the Public Advocate's Office and interested parties and for approval by the CPUC.

GTSR – Green Tariff Shared Renewables: The GTSR program enables customers to receive 50 to 100 percent of their electricity demand from renewable sources. The GTSR program has two components: the Green Tariff (GT) component and the Enhanced Community Renewables (ECR) component. Through GT, a customer may pay the difference between their current generation charge and the cost of procuring 50 to 100 percent renewables. With ECR, a customer agrees to purchase a share of a community renewable (typically solar) project directly from a developer and in exchange will receive a credit from their utility for the customer's avoided generation procurement.

GWh – Gigawatt-hour: This is the unit of energy equal to that expended in one hour at a rate of one billion watts. One GWh equals 1,000 megawatt-hours.

ICA – Integration Capacity Analysis: The enhanced integrated capacity and locational net benefit analysis quantify the capability of the system to integrate Distributed Energy Resources (DERs) within the distribution system. Results are dependent on the most limiting element of the various power system criteria such as thermal ratings, power quality, system protection limits and safety standards of existing equipment.

IDER – Integrated Distributed Energy Resources: A CPUC proceeding that aims to more effectively coordinate the integration of demand-side resources in order to better meet customer and grid needs, while enabling California to attain its greenhouse gas reduction goals.

IDSM – Integrated Demand-Side Management: This is an approach that joins together all the resources utilities have at their disposal to plan, generate and supply electricity in the most efficient manner possible.

IEPA – Independent Energy Producers Association: IEPA is California's oldest and leading nonprofit trade association, representing the interest of developers and operators of independent energy facilities and independent power marketers.

IMD – Independent Marketing Division: Under state law, IOUs are prohibited from lobbying or marketing on community choice unless the IOU forms an independent marketing division funded by shareholders rather than ratepayers. SDG&E and its parent company Sempra were permitted by the CPUC to create such an independent marketing division, which allowed SDG&E to lobby against plans to create a CCA program.

IOU – Investor-Owned Utility: An IOU is a private electricity and natural gas provider, such as SDG&E, PG&E or SCE, which are the three largest IOUs in California.

IRP – Integrated Resource Plan: An Integrated Resource Plan outlines an electric utility's resource needs in order to meet expected electricity demand long-term.

kW – Kilowatt: This is a measure of power where power (watts) = voltage (volts) x amperage (amps) and 1 kW = 1,000 watts.

kWh – Kilowatt-hour: This is a measure of consumption. It is the amount of electricity that is used over some period of time, typically a one-month period for billing purposes. Customers are charged a rate per kWh of electricity used.

LCE – Lancaster Choice Energy: LCE is the CCA that serves the City of Lancaster, California.

LCFS – Low Carbon Fuel Standard: This is a CARB program designed to encourage the use of cleaner low-carbon fuels in California, encourage the production of those fuels and, therefore, reduce greenhouse gas emissions.

LCR – Local (RA) Capacity Requirements: This is the amount of Resource Adequacy capacity required to be demonstrated in a specific location or zone.

LMP – Locational Marginal Price: Each generator unit and load pocket is assigned a node in the CAISO optimization model. The model will assign a LMP to the node in both the day-ahead and real-time market as it balances the system using the least cost. The LMP is composed of three components: the marginal cost of energy, congestion and losses. The LMP is used to financially settle transactions in the CAISO.

LNBA – Locational Net Benefits Analysis: This is a cost-benefit analysis of distributed resources that incorporates location-specific net benefits to the electric grid.

Load: Load refers to an end-use device or customer that receives power from an energy delivery system. Load should not be confused with Demand, which is the measure of power that a load receives or requires. See Demand.

LSE – Load-serving Entity: Load-serving Entities have been granted authority by state, local law or regulation to serve their own load directly through wholesale energy purchases and have chosen to exercise that authority.

LTPP – Long-Term Procurement Rulemaking: This is an "umbrella" proceeding to consider, in an integrated fashion, all of the CPUC's electric procurement policies and Programs.

MCE – Marin Clean Energy: MCE was the first CCA in California and began serving customers in 2010. It serves customers in Contra Costa, Marin, Napa and Solano counties in Northern California.

MEO – Marketing Education and Outreach: This is a term generally used to describe various strategies to inform customers, such as to motivate consumers to take action on energy efficiency or conservation measures and change their behavior.

MW – Megawatt: A megawatt hour (Mwh) is equal to 1,000 Kilowatt hours (Kwh) or 1,000 kilowatts of electricity used continuously for one hour.

MWH – Megawatt-hour: This is a measure of energy.

NAESCO – National Association of Energy Service Companies: NAESCO is an advocacy and accreditation organization for energy service companies (ESCOs). Energy service companies contract with private and public-sector energy users to provide cost-effective energy efficiency retrofits across a wide spectrum of client facilities.

NBC – Non-Bypassable Charge: Non-Bypassable Charges are fees that are paid on every kilowatt-hour of electricity that is consumed from the grid. These charges can be used to fund things like energy assistance programs for low-income households and energy efficiency programs. These charges apply even if customers buy grid-supplied power from an outside power company such as a CCA.

NDA – Non-Disclosure Agreement: An NDA is a contract by which one or more parties agree not to disclose confidential information that they have shared with each other.

NEM – Net Energy Metering: NEM is a program in which solar customers receive credit for excess electricity generated by solar panels.

NRDC – Natural Resources Defense Council: NRDC is a nonprofit international environmental advocacy group.

NP-15 – North Path 15: NP-15 is a CAISO pricing zone usually used to approximate wholesale electricity prices in Northern California in PG&E's service territory.

OIR – Order Instituting Rulemaking: An OIR is a procedural document that is issued by the CPUC to start a formal proceeding. A draft OIR is issued for comment by interested parties and made final by vote of the five commissioners of the CPUC.

OSC – Order to Show Cause: OSC is an order requiring an individual or entity to explain, justify or prove something.

ORA – Office of Ratepayer Advocates: The ORA is an independent consumer advocate within the CPUC, now called the Public Advocates Office.

PA – Program Administrator (for EE Business Plans): IOUs and local government agencies can be authorized to implement CPUC-directed energy efficiency programs.

PCE – Peninsula Clean Energy Authority: PCE is the CCA serving San Mateo County and all 20 of its cities and towns as well as the City of Los Banos.

PCC1 – RPS Portfolio Content Category 1: RPS Portfolio Content Category 1 includes bundled renewables where the energy and Renewable Energy Certificate (REC) are dynamically scheduled into a California Balancing Authority (CBA) such as the CAISO, also known as "in-state" renewables.

PCC2 – RPS Portfolio Content Category 2: RPS Portfolio Content Category 2 includes bundled renewables where the energy and Renewable Energy Certificate (REC) are from out of state and not dynamically scheduled to a CBA.

PCC3 – RPS Portfolio Content Category 3: RPS Portfolio Content Category 3 includes Unbundled Renewable Energy Certificate (REC).

PCIA or "exit fee" – Power Charge Indifference Adjustment: The Power Charge Indifference Adjustment (PCIA) is an "exit fee" based on stranded costs of utility generation set by the California Public Utilities Commission. It is calculated annually and assessed to customers of CCAs and paid to the IOU that lost those customers as a result of the formation of a CCA.

PCL – Power Content Label: The PCL is a user-friendly way of displaying information to California consumers about the energy resources used to generate the electricity they sell, as required by AB 162 (Chapter 313, Statutes of 2009) and SB 1305 (Chapter 796, Statutes of 1997).

PD – Proposed Decision: A PD is a procedural document in a CPUC Rulemaking that is formally commented on by parties to the proceeding. A PD is a precursor to a final decision voted on by the five commissioners of the CPUC.

PG&E – Pacific Gas & Electric: PG&E is the IOU that serves 16 million people over a 70,000-square-mile service area in Northern California.

PHC – Prehearing Conference: A PHC is a CPUC hearing to discuss the scope of a proceeding, among other matters. Interested stakeholders can request party status during these conferences.

Pnode – Pricing Node: In the CAISO optimization model, this is a point where a physical injection or withdrawal of energy is modeled and for which an LMP is calculated.

PPA – Power Purchase Agreement: A PPA is a contract used to purchase the energy, capacity and attributes from a renewable resource project.

PRP – Priority Review Project: These are transportation electrification pilot projects approved by the CPUC pursuant to SB 350 (Chapter 547, Statutes of 2015).

PRRR – Progress on Residential Rate Reform: Pursuant to a CPUC decision, the IOUs must submit to the CPUC and other parties periodic updates on the progress of their efforts to assist customers with residential rate design changes related to rate reform, including tier collapse and transition to a default time of use rate.

PUC – Public Utilities Code: The PUC is a California statute that contains 33 divisions; the range of topics within this code includes natural gas restructuring, private energy producers, telecommunication services, and specific municipal utility districts and transit authorities; the primary statute for governance of utilities as well as CCAs in California.

PURPA – Public Utilities Regulatory Policy Act: The PURPA is a federal statute passed in 1978 by Congress in response to the 1973 energy crisis to encourage fuel diversity via alternative energy sources and to introduce competition into the electric sector. It was intended to promote energy conservation (reduce demand) and promote greater use of domestic energy and renewable energy (increase supply).

RA – Resource Adequacy: Under its Resource Adequacy (RA) program, the California Public Utilities Commission (CPUC) requires load-serving entities — investor-owned utilities, electricity service providers and CCAs — to demonstrate in both monthly and annual filings that they have purchased capacity commitments of no less than 115% of their peak loads.

RAM – Renewables Auction Mechanism: This is a procurement program the investor-owned utilities (IOUs) may use to procure RPS eligible generation. The IOUs may use RAM to satisfy authorized procurement needs, for example, system Resource Adequacy needs, local Resource Adequacy needs, RPS needs, reliability needs, Local Capacity Requirements, Green Tariff Shared Renewables needs and any need arising from commission or legislative mandates.

RE – Renewable Energy: Renewable energy is energy from a source that is not depleted when used, such as wind or solar power.

REC - Renewable Energy Certificate: A REC is the property right to the environmental benefits associated with generating renewable electricity. For instance, homeowners who generate solar electricity are credited with 1 solar REC for every megawatt-hour of electricity they produce. Utilities obligated to fulfill an RPS requirement can purchase these RECs on the open market.

RES-BCT – Renewables Energy Self-Generation Bill Credit Transfer: This program enables local governments and universities to share generation credits from a system located on one government-owned property with billing accounts at other government-owned properties. The system size limit under RES-BCT is 5 MW, and bill credits are applied at the generation-only portion of a customer's retail rate.

RFO – Request for Offers: This is a competitive procurement process used by organizations to solicit the submission of proposals from interested parties in response to a scope of services.

RPS - Renewable Portfolio Standard: RPS is a law that requires California utilities and other load-serving entities (including CCAs) to provide an escalating percentage of California qualified renewable power (culminating at 33% by 2020) in their annual energy portfolio.

SB – Senate Bill: A Senate Bill is a piece of legislation that is introduced in the Senate. In other words, the Senate, rather than the Assembly, is the house of origin in the Legislature for the Legislation.

SBP – Solar Billing Plan: The Solar Billing Plan, also known as the Net Billing Tariff or NEM 3.0, is the new method of compensating customer-sited renewable energy self-generation, intended to promote grid reliability and incentivize solar and battery storage.

SCE – Southern California Edison: SCE is the large IOU that serves the Los Angeles and Orange County area.

SCP – Sonoma Clean Power Authority: SCP is the CCA serving Sonoma County and surrounding areas in Northern California.

SDG&E – San Diego Gas & Electric: SDG&E is the IOU that serves San Diego County and owns the infrastructure that delivers Community Power energy to our customers.

SGIP – Self-Generation Incentive Program: SGIP is a program that provides incentives to support existing, new and emerging distributed energy resources (storage, wind turbines, waste heat to power technologies, etc.).

SUE – Super User Electric: This is an electric surcharge intended to penalize consumers for excessive energy use.

SVCE – Silicon Valley Clean Energy: SVCE is the CCA serving the communities in Santa Clara County.

TCR EPS Protocol – The Climate Registry Electric Power Sector Protocol: This refers to online tools and resources provided by The Climate Registry to assist organizations to measure, report and reduce carbon emissions.

TE – Transportation Electrification: For the transportation sector, electrification means replacing fossil fuels with electricity as the means of powering light-duty vehicles and medium- and heavy-duty trucks and buses. The primary goal is to reduce greenhouse gas (GHG) emissions and, ultimately, contribute to mitigating the effects of climate change on the planet.

Time-of-Use (TOU) Rates: TOU Rates refers to the pricing of delivered electricity based on the estimated cost of electricity during a particular time block. Time-of-use rates are usually divided into three or four time blocks per 24 hour period (on-peak, mid-peak, off-peak and sometimes super off-peak) and by seasons of the year (summer and winter). Real-time pricing differs from TOU rates in that it is based on actual (as opposed to forecasted) prices that may fluctuate many times a day and are weather sensitive, rather than varying with a fixed schedule.

TM – Tree Mortality: This is a term that refers to the death of forest trees and provides a measure of forest health. In the context of energy, as part of the Governor's Tree Mortality Emergency Proclamation, the CPUC is tasked with utilizing its authority to extend contracts and take actions to authorize new contracts on bioenergy facilities that receive feedstock from high hazard zones.

TURN – The Utility Reform Network: TURN is a ratepayer advocacy group charged with ensuring that California IOUs implement just and reasonable rates.

Unbundled RECs: Unbundled RECs are renewable energy certificates that verify a purchase of a MWH unit of renewable power where the actual power and the certificate are "unbundled" and sold to different buyers.

VPP – Virtual Power Plant: A Virtual Power Plant is a cloud-based network that leverages an aggregation of distributed energy resources (DERs) to shift energy demand or provide services to the grid. For example, thousands of EV chargers could charge at a slower speed and hundreds of home batteries could discharge to the grid during a demand peak to significantly reduce the procurement of traditional supply resources.

VAMO – Voluntary Allocation, Market Offer: VAMO is the process for SDG&E to allocate a proportional share of its renewable portfolio to Community Power and other LSEs within the service territory.