



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

FILED

10/08/18
04:59 PM

Order Instituting Rulemaking to Continue)
Implementation and Administration, and Consider)
Further Development, of California Renewables)
Portfolio Standard Program.)
_____)

Rulemaking 18-07-003

**UPDATED 2018 RENEWABLES PORTFOLIO STANDARD PROCUREMENT
PLAN OF SONOMA CLEAN POWER AUTHORITY**

Rebecca Simonson
Power Services Manager
Sonoma Clean Power Authority
50 Santa Rosa Avenue, 5 Floor
Santa Rosa, CA 95404
Tel: (707) 890-8487
Email: rsimonson@sonomacleanpower.org

Dated: October 8, 2018

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

Order Instituting Rulemaking to Continue)	Rulemaking 18-07-003
Implementation and Administration, and Consider)	
Further Development, of California Renewables)	
Portfolio Standard Program.)	
<hr/>)

**UPDATED 2018 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN
OF SONOMA CLEAN POWER AUTHORITY**

I. INTRODUCTION

In accordance with the California Public Utilities Commission’s (“Commission”) June 21, 2018 *Assigned Commissioner and Assigned Administrative Law Judge’s Ruling Identifying Issues and Schedule of Review for 2018 Renewables Portfolio Standard Procurement Plans* (“ACR”) and the September 19, 2018 *E-Mail Ruling Ordering All Investor-Owned Utilities, Community Choice Aggregators, and Electric Service Providers to File and Serve Updates to Their Draft 2018 Renewable Portfolio Standard Procurement Plans to Address Senate Bill 100* (“SB 100 Ruling”), Sonoma Clean Power Authority (“SCPA”) hereby submits this Updated 2018 Renewables Portfolio Standard Procurement Plan (“RPS Procurement Plan”). The E-mail Ruling of Administrative Law Judge (“ALJ”) Mason, dated July 9, 2018, granted motions to update RPS Procurement Plans and set a deadline of September 28, 2018 for filing the updated RPS Procurement Plans. The deadline for filing updated procurement plans was extended to October 8, 2018 by the *E-Mail Ruling Granting, in part, Request of Investor-Owned Utilities, Community Choice Aggregators, and Electric Service Providers for an Extension of Time to File and Serve Updates to 2018 RPS Plans*, dated September 24, 2018. As directed by the ACR and the SB 100 Ruling, this RPS Procurement Plan includes responses for the issues expressed

in ACR sections 5.1-5.8 and 5.11-5.13.

SCPA notes that certain issues and requests in these ACR sections apply to the other retail sellers (electrical corporations and electric service providers), and do not extend to Community Choice Aggregators (“CCAs”). SCPA is nevertheless voluntarily responding to these ACR sections in the interest of transparency and in order to collaborate with the Commission. The submission of this RPS Procurement Plan pursuant to the ACR, however, should not be construed as a waiver of the right to assert that components of Senate Bill (“SB”) 350 or in Commission decisions and rulings on RPS Procurement Plan submittals, do not extend to CCAs, and SCPA reserves the right to challenge any such assertion of jurisdiction over these matters.

SB 100 was signed by the Governor on September 10, 2018, and has an effective date of January 1, 2019. SB 100 increases the RPS procurement requirements to 44 percent by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. The SB 100 Ruling directs all Investor Owned Utilities (“IOUs”), Electric Service Providers (“ESPs”), and CCAs to file and serve updates to their 2018 Renewables Portfolio Standard Procurement Plans to address SB 100. As a local governmental agency that provides power to our ratepayers, SCPA’s Governing Board authorizes and oversees SCPA’s procurement planning activities and procurement strategies through an open and public process.¹ In light of the fact that SB 100 was only recently signed and is not yet effective, SCPA has not had an opportunity to present updated planning recommendations and procurement strategies to address SB 100 to its Governing Board. Without such direction from SCPA’s Board of Directors, this

¹ See, e.g., Cal. Pub. Util. Code § 366.2(a)(5) (“A community choice aggregator shall be solely responsible for all generation procurement activities on behalf of the community choice aggregator’s customers, except where other generation procurement arrangements are expressly authorized by statute.”).

updated procurement plan does not include any substantive changes or representations concerning SCPA's planning or procurement strategies related to achievement of SB 100 targets at this time. However, as a member of CalCCA, SCPA actively supported SB 100 and SCPA staff fully intends to engage with our Governing Board in planning activities and to recommend procurement strategies in the near term that will be designed to meet SB 100's increased procurement requirements.

II. RPS PROCUREMENT PLAN

5.1 Assessment of RPS Portfolio Supplies and Demand - § 399.13(a)(5)(A)

SCPA expects to meet the RPS compliance obligations. The exact portfolio characteristics selected may vary depending on legislative and policy changes, technological improvements, preferences of the community, or other developments. To manage this future uncertainty, SCPA continuously examines and estimates supply and customer demand, including demand trends as they relate to population of customers served, climate, energy efficiency, distributed generation, electrification of vehicles and buildings, and emerging industry. SCPA structures its procurement efforts to balance customer demand with resource commitments. This examination of customer demand and other market developments will help reduce costs and assist in meeting planned procurement for the period in the 2018 RPS Procurement Plans. SCPA also considers the deliverability characteristics of its resources (such as the resource's dispatchability and available capacity) and reviews the respective risks associated with short and long term purchases as part of its forecasting and procurement processes. These efforts will lead to a more diverse resource mix, address grid integration issues, closely match our electrical supply to our customers' demand, and provide value to the local community. A quantitative description of this forecast is attached to the RPS Procurement Plan in Appendix A.

5.2 Project Development Status Update - § 399.13(a)(5)(D)

SCPA has entered into contracts with facilities that are not yet in commercial operation.

These contracts have the following status:

- Pristine Sun Fund 8, LLC – 12.5 MW of solar facilities are in pre-construction status and have not yet broken ground.
- Golden Hills North Wind, LLC – 46 MW of wind facilities reached commercial operation in November 2017.

SCPA has entered into additional contracts that were not reported in last year's

Procurement Plan. These contracts have the following status:

- Sand Hill C, LLC – 80 MW of wind facilities are under development and expected to be operational by December 2020.
- Proxima Solar Energy Center – 50 MW of solar plus 5 MW of battery storage under development and expected to be operational by December 2023. Please note this transaction was recently executed and full project analysis has not been input in the quantitative information in Section 5.5 or reflected in Appendix A.
- Feed-in-Tariff solar contracts:
 - Lavio Solar, LLC – 1 MW of local solar in Sonoma County reached commercial operation in April 2018.
 - Stage Gulch Solar, LLC – 1 MW of local solar in Sonoma County reached commercial operation in April 2018.
 - Bodega Energy West, LLC & Petaluma Energy East, LLC – 2 MW of solar facilities (metered as two separate 1 MW projects) are in development and

contracted to be operational by October 2018, however have not yet broken ground.

- Cloverdale Solar Center, LLC – A 1 MW solar facility in Sonoma County is contracted to be operational by September 2018, however the project has received a 6-month extension due to permitting delays.
- IP Malbec, LLC – A 1 MW solar facility in Mendocino County is contracted to be operational by June, 2019.

5.3 Potential Compliance Delays - § 399.13(a)(5)(B)

SCPA does not anticipate any compliance delays for this compliance period. If a future compliance issue is identified, then SCPA will address those issues and then describe them in the following RPS Procurement Plan.

5.4 Risk Assessment - § 399.13(a)(5)(F)

SCPA has 3 MW of solar resources in Sonoma County and 1 MW of in Mendocino County under Feed-in-Tariff contracts that are at risk of being delayed. The expected energy production at risk is reflected in the Quantitative Information provided in Appendix A. Given the small size of these projects, SCPA will be able to procure any necessary shortfall in the near-term markets. As noted in Section 399.13(a)(5)(A), and the ACR, generation variability and resource availability may impact the amount of future electricity delivered. SCPA considers this potential risk in forecasting as well as during procurement review and decision-making.

5.5 Quantitative Information - §§ 399.13(a)(5)(A), (B), (D) and (F)

SCPA has provided a quantitative assessment to support the qualitative descriptions provided in this RPS Procurement Plan, which is attached as Appendix A. The quantitative information in Appendix A presents resources that are procured under existing contracts only.

Note that the quantitative forecast shows an RPS figure of 42% for 2021 based on existing contracts, however SCPA has a public commitment to achieve 50% RPS by 2020 and this will be reflected in future filings as more RPS resources are contracted. Also note that the actual quantities for the 2014-2016 compliance period are shown for the year in which they were contracted, not necessarily the year in which the REC was retired for RPS.

Pursuant to the direction in the SB 100 Ruling, SCPA changed the RPS Procurement Quantity Requirement (Row 7) for the years 2021-2030 to reflect the increased requirements of SB 100. Because the Commission has not adopted a Decision implementing the new procurement quantity requirements as amended by SB 100, SCPA has estimated the applicable annual percentages based on the methodology used by the Commission in D.16-12-040.

5.6 Minimum Margin of Procurement - §399.13(a)(4)(D)

SCPA has Total RPS Eligible Procurement in excess of the Gross RPS Procurement Quantity Requirement through 2025 as shown in Appendix A. SCPA is also actively working on contracts that will add to the Total RPS Eligible Procurement, further exceeding the requirements of RPS. SCPA is committed to delivering 50% RPS by 2020, 10 years ahead of the compliance schedule. SCPA continually tracks the variability in forecasted versus actual load and generation and can utilize short-term contracts for additional RPS quantities, if necessary. Though SCPA may need to utilize short-term RPS contracts, SCPA will exceed all long-term contracting requirements and will demonstrate this in the annual RPS Compliance filing.

5.7 Bid Solicitation Protocol, Including Least-Cost Best Fit Methodologies - § 399.13(a)(5)(C) and D.04-07-029

Consistent with Section 399.13(a)(5)(C), SCPA conducts bid solicitations for procuring energy resources that includes specific needs for eligible renewable energy resources, generating capacity, locational preferences, generation profile, and required online dates to

assist in determining what resources fit best within a portfolio. Since CCA program governing boards are comprised of local elected officials, these solicitation and procurement decisions are overseen by elected representatives of the community. These solicitation and procurement decisions seek to comply with locally-set targets that tend to exceed the RPS requirement and provide value to the community by focusing on carbon-free resources.

SCPA issued a Request for Offers (“RFO”) in January 2018 for RPS Category 1 resources. As a result of this RFO, SCPA has executed an 80 MW wind contract which is included in the Quantitative Information in Appendix A and is currently negotiating 70 MW of solar and 5 MW of battery storage in addition to the RPS Eligible Procurement shown in the Quantitative Information in Appendix A.

5.8 Consideration of Price Adjustment Mechanisms - § 399.13(a)(5)(E)

Consistent with SB 350, SCPA reviews the prospects of incorporating price adjustments in contracts with online dates more than 24 months after the date of contract execution. As noted in the ACR, such price adjustments could include price indexing to key components or to the Consumer Price Index.

5.11 Important Changes to Plans Noted

SCPA began service to Mendocino County June 1, 2017. The retail sales forecast now incorporates actual recorded data from this added load. The retail sales forecast also includes the impact of lost accounts due to the October 2017 Wildfires.

5.12 Redlined Copy of Plans Required

SCPA has attached a redline copy of its prior plan as Appendix B.

5.13 Safety Considerations

SCPA holds safety as a top priority. There are no unique safety issues related to SCPA's procurement of resources. Since SCPA does not own, operate, or control generation facilities, there are no present safety considerations to report.

Dated: October 8, 2018

Respectfully submitted,



Rebecca Simonson
Power Services Manager
Sonoma Clean Power Authority
50 Santa Rosa Avenue, 5th Floor
Santa Rosa, CA 95404
Tel: (707) 890-8487
Email: rsimonson@sonomacleanpower.org

APPENDIX A
QUANTITATIVE RESPONSE

Renewable Net Short Calculations - 2018 RPS Procurement Plans

Sonoma Clean Power Authority

8-Oct-18

Input required

No input required

Hard-coded

Variable	Calculation	Item	Deficit from RPS prior to Reporting Year	2011 Actual	2012 Actual	2013 Actual	2011-2013	2014 Actual	2015 Actual	2016 Actual	2014-2016	2017 Actual
		Forecast Year					CP1				CP2	
Annual RPS Requirement												
A		Total Retail Sales					-	581	1,987	2,187	4,755	2,381
B		RPS Procurement Quantity Requirement (%)		20.0%	20.0%	20.0%		21.7%	23.3%	25.0%		27.0%
C	A*B	Gross RPS Procurement Quantity Requirement (GWh)		-	-	-	-	126	463	547	1,136	643
D		Voluntary Margin of Over-procurement						132	351	234		434
E	C+D	Net RPS Procurement Need (GWh)		-	-	-	-	258	814	780	1,136	1,077
RPS-Eligible Procurement												
Fa		Risk-Adjusted RECs from Online Generation						258	814	1,188	2,261	1,077
Faa		Forecast Failure Rate for Online Generation (%)										-
Fb		Risk-Adjusted RECs from RPS Facilities in Development										-
Fbb		Forecast Failure Rate for RPS Facilities in Development (%)										-
Fc		Pre-Approved Generic RECs										-
Fe		Executed REC Sales								408	408	
F	Fa+Fb+Fc-Fe	Total RPS Eligible Procurement (GWh)		-	-	-	-	258	814	780	1,853	1,077
F0		Category 0 RECs ³										
F1		Category 1 RECs ³						106	307	555	969	534
F2		Category 2 RECs ³						86	418	563	1,068	542
F3		Category 3 RECs ³						66	89	70	224	-
Gross RPS Position (Physical Net Short)												
Ga	F-E	Annual Gross RPS Position (GWh)		-	-	-	-	-	-	-	717	-
Gb	F/A	Annual Gross RPS Position (%)		0%	0%	0%	0%	44%	41%	36%	39%	45%
Application of Bank												
Ha		Existing Banked RECs above the PQR										
Hb		RECs above the PQR added to Bank										
Hc		Non-bankable RECs above the PQR										
H	Ha+Hb	Gross Balance of RECs above the PQR		-	-	-	-	-	-	-	-	-
Ia		Planned Application of RECs above the PQR towards RPS Compliance										
Ib		Planned Sales of RECs above the PQR										
J	H-Ia-Ib	Net Balance of RECs above the PQR		-	-	-	-	-	-	-	-	-
J0		Category 0 RECs										
J1		Category 1 RECs										
J2		Category 2 RECs										
Expiring Contracts												
K		RECs from Expiring RPS Contracts										
Net RPS Position (Optimized Net Short)												
La	Ga+Ia-Ib-Hc	Annual Net RPS Position after Bank Optimization (GWh)		-	-	-	-	-	-	-	717	-
Lb	(F+Ia-Ib-Hc)/A	Annual Net RPS Position after Bank Optimization (%)		0%	0%	0%	0%	44%	41%	36%	39%	45%

Note: Forecasted Generation associated with Proxima Solar Energy Center Contract is not reflected in this document. Please see Section 5.2 of SCPA's Updated 2018 Renewables Portfolio Standard Procurement Plan.

Note: Values are to be shown in GWhs

Renewable Net Short Calculations - 2018 RPS Procurement Plans

Sonoma Clean Power Authority

8-Oct-18

Variable	Calculation	Item	2018 Forecast	2019 Forecast	2020 Forecast	2017-2020	2021 Forecast	2022 Forecast	2023 Forecast	2024 Forecast	2025 Forecast	2026 Forecast	2027 Forecast
		Forecast Year	1	2	3	CP3	4	5	6	7	8	9	10
Annual RPS Requirement													
A		Total Retail Sales	2,510	2,532	2,532	9,954	2,532	2,532	2,531	2,530	2,529	2,527	2,526
B		RPS Procurement Quantity Requirement (%)	29.0%	31.0%	33.0%		35.8%	38.5%	41.3%	44.0%	46.7%	49.3%	52.0%
C	A*B	Gross RPS Procurement Quantity Requirement (GWh)	728	785	835	2,991	906	975	1,045	1,113	1,181	1,246	1,313
D		Voluntary Margin of Over-procurement	451	441	365		164	95	24	(44)	(114)	-	-
E	C+D	Net RPS Procurement Need (GWh)	1,179	1,226	1,200	2,991	1,071	1,070	1,069	1,069	1,067	1,246	1,313
RPS-Eligible Procurement													
Fa		Risk-Adjusted RECs from Online Generation	1,179	1,219	1,191	4,666	1,061	1,060	1,059	1,060	1,058	1,057	618
Faa		Forecast Failure Rate for Online Generation (%)				-							
Fb		Risk-Adjusted RECs from RPS Facilities in Development		7	10	16	10	10	9	9	9	9	9
Fbb		Forecast Failure Rate for RPS Facilities in Development (%)				-							
Fc		Pre-Approved Generic RECs				-							
Fe		Executed REC Sales				-							
F	Fa+Fb+Fc-Fe	Total RPS Eligible Procurement (GWh)	1,179	1,226	1,200	4,682	1,071	1,070	1,069	1,069	1,067	1,066	627
F0		Category 0 RECs ³				-							
F1		Category 1 RECs ³	803	809	812	2,958	1,071	1,070	1,069	1,069	1,067	1,066	627
F2		Category 2 RECs ³	377	417	388	1,724	-	-	-	-	-	-	-
F3		Category 3 RECs ³	-	-	-	-	-	-	-	-	-	-	-
Gross RPS Position (Physical Net Short)													
Ga	F-E	Annual Gross RPS Position (GWh)	-	-	-	1,691	-	-	-	-	-	(180)	(686)
Gb	F/A	Annual Gross RPS Position (%)	47%	48%	47%	47%	42%	42%	42%	42%	42%	42%	25%
Application of Bank													
Ha		Existing Banked RECs above the PQR											
Hb		RECs above the PQR added to Bank											
Hc		Non-bankable RECs above the PQR											
H	Ha+Hb	Gross Balance of RECs above the PQR	-	-	-	-	-	-	-	-	-	-	-
Ia		Planned Application of RECs above the PQR towards RPS Compliance											
Ib		Planned Sales of RECs above the PQR											
J	H-Ia-Ib	Net Balance of RECs above the PQR	-	-	-	-	-	-	-	-	-	-	-
J0		Category 0 RECs											
J1		Category 1 RECs											
J2		Category 2 RECs											
Expiring Contracts													
K		RECs from Expiring RPS Contracts											
Net RPS Position (Optimized Net Short)													
La	Ga+Ia-Ib-Hc	Annual Net RPS Position after Bank Optimization (GWh)	-	-	-	1,691	-	-	-	-	-	(180)	(686)
Lb	(F+Ia-Ib-Hc)/A	Annual Net RPS Position after Bank Optimization (%)	47%	48%	47%	47%	42%	42%	42%	42%	42%	42%	25%

Note: Forecasted Generation associated with Proxima Solar Energy Center Contract is not reflected in this document. Please see Section 5.2 of SCPA's Updated 2018 Renewables Portfolio Standard Procurement Plan.

Note: Values are to be shown in GWhs

Renewable Net Short Calculations - 2018 RPS Procurement Plans

Sonoma Clean Power Authority

8-Oct-18

Variable	Calculation	Item	2028 Forecast	2029 Forecast	2030 Forecast
		Forecast Year	11	12	13
Annual RPS Requirement					
A		Total Retail Sales	2,526	2,527	2,529
B		RPS Procurement Quantity Requirement (%)	54.7%	57.3%	60.0%
C	A*B	Gross RPS Procurement Quantity Requirement (GWh)	1,382	1,448	1,517
D		Voluntary Margin of Over-procurement	-	-	-
E	C+D	Net RPS Procurement Need (GWh)	1,382	1,448	1,517
RPS-Eligible Procurement					
Fa		Risk-Adjusted RECs from Online Generation	617	616	615
Faa		Forecast Failure Rate for Online Generation (%)			
Fb		Risk-Adjusted RECs from RPS Facilities in Development	9	9	9
Fbb		Forecast Failure Rate for RPS Facilities in Development (%)			
Fc		Pre-Approved Generic RECs			
Fe		Executed REC Sales			
F	Fa+Fb+Fc-Fe	Total RPS Eligible Procurement (GWh)	626	625	624
F0		Category 0 RECs ³			
F1		Category 1 RECs ³	626	625	624
F2		Category 2 RECs ³	-	-	-
F3		Category 3 RECs ³	-	-	-
Gross RPS Position (Physical Net Short)					
Ga	F-E	Annual Gross RPS Position (GWh)	(755)	(823)	(893)
Gb	F/A	Annual Gross RPS Position (%)	25%	25%	25%
Application of Bank					
Ha		Existing Banked RECs above the PQR			
Hb		RECs above the PQR added to Bank			
Hc		Non-bankable RECs above the PQR			
H	Ha+Hb	Gross Balance of RECs above the PQR	-	-	-
Ia		Planned Application of RECs above the PQR towards RPS Compliance			
Ib		Planned Sales of RECs above the PQR			
J	H-Ia-Ib	Net Balance of RECs above the PQR	-	-	-
J0		Category 0 RECs			
J1		Category 1 RECs			
J2		Category 2 RECs			
Expiring Contracts					
K		RECs from Expiring RPS Contracts			
Net RPS Position (Optimized Net Short)					
La	Ga+Ia-Ib-Hc	Annual Net RPS Position after Bank Optimization (GWh)	(755)	(823)	(893)
Lb	(F+Ia-Ib-Hc)/A	Annual Net RPS Position after Bank Optimization (%)	25%	25%	25%

Note: Forecasted Generation associated with Proxima Solar Energy Center Contract is not reflected in this document. Please see Section 5.2 of SCPA's Updated 2018 Renewables Portfolio Standard Procurement Plan.

Note: Values are to be shown in GWhs

APPENDIX B

REDLINE COPY OF PRIOR RPS PROCUREMENT PLAN

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

Order Instituting Rulemaking to Continue)	
Implementation and Administration, and Consider)	Rulemaking 18-07-00315-
Further Development, of California Renewables)	02-020
Portfolio Standard Program.)	(Filed February 26, 2015)
_____)	

**UPDATED 2018 RENEWABLES PORTFOLIO STANDARD PROCUREMENT
PLAN OF SONOMA CLEAN POWER AUTHORITY**

Rebecca Simonson
Power Services Manager
Sonoma Clean Power Authority
50 Santa Rosa Avenue, 5 Floor
Santa Rosa, CA 95404
Tel: (707) 890-8487
Email: rsimonson@sonomacleanpower.org

Dated: [October 8, 2018](#)~~August 16, 2018~~

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

Order Instituting Rulemaking to Continue)	Rulemaking 18-07-00315-
Implementation and Administration, and Consider)	02-020
Further Development, of California Renewables)	(Filed February 26, 2015)
Portfolio Standard Program.)	
<hr/>		

**UPDATED 2018 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN
OF SONOMA CLEAN POWER AUTHORITY**

I. INTRODUCTION

In accordance with the California Public Utilities Commission’s (“Commission”) June 21, 2018 *Assigned Commissioner and Assigned Administrative Law Judge’s Ruling Identifying Issues and Schedule of Review for 2018 Renewables Portfolio Standard Procurement Plans* (“ACR”) and the [September 19, 2018 E-Mail Ruling Ordering All Investor-Owned Utilities, Community Choice Aggregators, and Electric Service Providers to File and Serve Updates to Their Draft 2018 Renewable Portfolio Standard Procurement Plans to Address Senate Bill 100](#) (“SB 100 Ruling”), Sonoma Clean Power Authority (“SCPA”) hereby submits this [Updated 2018 Renewables Portfolio Standard Procurement Plan](#) (“RPS Procurement Plan”). [The E-mail Ruling of Administrative Law Judge \(“ALJ”\) Mason, dated July 9, 2018, granted motions to update RPS Procurement Plans and set a deadline of September 28, 2018 for filing the updated RPS Procurement Plans. The deadline for filing updated procurement plans was extended to October 8, 2018 by the E-Mail Ruling Granting, in part, Request of Investor-Owned Utilities, Community Choice Aggregators, and Electric Service Providers for an Extension of Time to File and Serve Updates to 2018 RPS Plans, dated September 24, 2018.](#) As directed by the ACR

[and the SB 100 Ruling](#), this RPS Procurement Plan includes responses for the issues expressed in ACR sections 5.1-5.8 and 5.11-5.13.

SCPA notes that certain issues and requests in these ACR sections apply to the other retail sellers (electrical corporations and electric service providers), and do not extend to Community Choice Aggregators (“[CCAs](#)”). SCPA is nevertheless voluntarily responding to these ACR sections in the interest of transparency and in order to collaborate with the Commission. The submission of this RPS Procurement Plan pursuant to the ACR, however, should not be construed as a waiver of the right to assert that components of Senate Bill (“[SB](#)”) 350 or in Commission decisions and rulings on RPS Procurement Plan submittals, do not extend to CCAs, and SCPA reserves the right to challenge any such assertion of jurisdiction over these matters.

[SB 100 was signed by the Governor on September 10, 2018, and has an effective date of January 1, 2019. SB 100 increases the RPS procurement requirements to 44 percent by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. The SB 100 Ruling directs all Investor Owned Utilities \(“IOUs”\), Electric Service Providers \(“ESPs”\), and CCAs to file and serve updates to their 2018 Renewables Portfolio Standard Procurement Plans to address SB 100. As a local governmental agency that provides power to our ratepayers, SCPA’s Governing Board authorizes and oversees SCPA’s procurement planning activities and procurement strategies through an open and public process.¹ In light of the fact that SB 100 was only recently signed and is not yet effective, SCPA has not had an opportunity to present updated planning recommendations and procurement strategies to address](#)

¹ [See, e.g., Cal. Pub. Util. Code § 366.2\(a\)\(5\) \(“A community choice aggregator shall be solely responsible for all generation procurement activities on behalf of the community choice aggregator’s customers, except where other generation procurement arrangements are expressly authorized by statute.”\)](#).

SB 100 to its Governing Board. Without such direction from SCPA's Board of Directors, this updated procurement plan does not include any substantive changes or representations concerning SCPA's planning or procurement strategies related to achievement of SB 100 targets at this time. However, as a member of CalCCA, SCPA actively supported SB 100 and SCPA staff fully intends to engage with our Governing Board in planning activities and to recommend procurement strategies in the near term that will be designed to meet SB 100's increased procurement requirements.

II. RPS PROCUREMENT PLAN

5.1 Assessment of RPS Portfolio Supplies and Demand - § 399.13(a)(5)(A)

SCPA expects to meet the RPS compliance obligations. The exact portfolio characteristics selected may vary depending on legislative and policy changes, technological improvements, preferences of the community, or other developments. To manage this future uncertainty, SCPA continuously examines and estimates supply and customer demand, including demand trends as they relate to population of customers served, climate, energy efficiency, distributed generation, electrification of vehicles and buildings, and emerging industry. SCPA structures its procurement efforts to balance customer demand with resource commitments. This examination of customer demand and other market developments will help reduce costs and assist in meeting planned procurement for the period in the 2018 RPS Procurement Plans. SCPA also considers the deliverability characteristics of its resources (such as the resource's dispatchability and available capacity) and reviews the respective risks associated with short and long term purchases as part of its forecasting and procurement processes. These efforts will lead to a more diverse resource mix, address grid integration issues, closely match our electrical supply to our customers' demand, and provide value to the local community. A quantitative

description of this forecast is attached to the RPS Procurement Plan in Appendix A.

5.2 Project Development Status Update - § 399.13(a)(5)(D)

SCPA has entered into contracts with facilities that are not yet in commercial operation.

These contracts have the following status:

- Pristine Sun Fund 8, LLC – 12.5 MW of solar facilities are in pre-construction status and have not yet broken ground.
- Golden Hills North Wind, LLC - 46 MW of wind facilities reached commercial operation in November 2017.

SCPA has entered into additional contracts that were not reported in last year's

Procurement Plan. These contracts have the following status:

- Sand Hill C, LLC- 80 MW of wind facilities are under development and expected to be operational by December 2020.
- [Proxima Solar Energy Center – 50 MW of solar plus 5 MW of battery storage under development and expected to be operational by December 2023. Please note this transaction was recently executed and full project analysis has not been input in the quantitative information in Section 5.5 or reflected in Appendix A.](#)
- Feed-in-Tariff solar contracts:
 - Lavio Solar, LLC- 1 MW of local solar in Sonoma County reached commercial operation in April 2018.
 - Stage Gulch Solar, LLC - 1 MW of local solar in Sonoma County reached commercial operation in April 2018.
 - Bodega Energy West, LLC & Petaluma Energy East, LLC- 2 MW of solar facilities (metered as two separate 1 MW projects) are in development and

contracted to be operational by October 2018, however have not yet broken ground.

- Cloverdale Solar Center, LLC- A 1 MW solar facility in Sonoma County is contracted to be operational by September 2018, however the project has received a 6-month extension due to permitting delays.
- IP Malbec, LLC- A 1 MW solar facility in Mendocino County is contracted to be operational by June, 2019.

5.3 Potential Compliance Delays - § 399.13(a)(5)(B)

SCPA does not anticipate any compliance delays for this compliance period. If a future compliance issue is identified, then SCPA will address those issues and then describe them in the following RPS Procurement Plan.

5.4 Risk Assessment - § 399.13(a)(5)(F)

SCPA has 3 MW of solar resources in Sonoma County and 1 MW of in Mendocino County under Feed-in-Tariff contracts that are at risk of being delayed. The expected energy production at risk is reflected in the Quantitative Information provided in Appendix A. Given the small size of these projects, SCPA will be able to procure any necessary shortfall in the near-term markets. As noted in Section 399.13(a)(5)(A), and the ACR, generation variability and resource availability may impact the amount of future electricity delivered. SCPA considers this potential risk in forecasting as well as during procurement review and decision-making.

5.5 Quantitative Information - §§ 399.13(a)(5)(A), (B), (D) and (F)

SCPA has provided a quantitative assessment to support the qualitative descriptions provided in this RPS Procurement Plan, which is attached as Appendix A. The quantitative information in Appendix A presents resources that are procured under existing contracts only.

Note that the quantitative forecast shows an RPS figure of 42% for 2021 based on existing contracts, however SCPA has a public commitment to achieve 50% RPS by 2020 and this will be reflected in future filings as more RPS resources are contracted. Also note that the actual quantities for the 2014-2016 compliance period are shown for the year in which they were contracted, not necessarily the year in which the REC was retired for RPS.

[Pursuant to the direction in the SB 100 Ruling, SCPA changed the RPS Procurement Quantity Requirement \(Row 7\) for the years 2021-2030 to reflect the increased requirements of SB 100. Because the Commission has not adopted a Decision implementing the new procurement quantity requirements as amended by SB 100, SCPA has estimated the applicable annual percentages based on the methodology used by the Commission in D.16-12-040.](#)

5.6 Minimum Margin of Procurement - §399.13(a)(4)(D)

SCPA has Total RPS Eligible Procurement in excess of the Gross RPS Procurement Quantity Requirement through 2025 as shown in Appendix A. SCPA is also actively working on contracts that will add to the Total RPS Eligible Procurement, further exceeding the requirements of RPS. SCPA is committed to delivering 50% RPS by 2020, 10 years ahead of the compliance schedule. SCPA continually tracks the variability in forecasted versus actual load and generation and can utilize short-term contracts for additional RPS quantities, if necessary. Though SCPA may need to utilize short-term RPS contracts, SCPA will exceed all long-term contracting requirements and will demonstrate this in the annual RPS Compliance filing.

5.7 Bid Solicitation Protocol, Including Least-Cost Best Fit Methodologies - § 399.13(a)(5)(C) and D.04-07-029

Consistent with Section 399.13(a)(5)(C), SCPA conducts bid solicitations for procuring energy resources that includes specific needs for eligible renewable energy resources, generating capacity, locational preferences, generation profile, and required online dates to

assist in determining what resources fit best within a portfolio. Since CCA program governing boards are comprised of local elected officials, these solicitation and procurement decisions are overseen by elected representatives of the community. These solicitation and procurement decisions seek to comply with locally-set targets that tend to exceed the RPS requirement and provide value to the community by focusing on carbon-free resources.

SCPA issued a Request for Offers (“RFO”) in January 2018 for RPS Category 1 resources. As a result of this RFO, SCPA has executed an 80 MW wind contract which is included in the Quantitative Information in Appendix A and is currently negotiating 70 MW of solar and 5 MW of battery storage in addition to the RPS Eligible Procurement shown in the Quantitative Information in Appendix A.

5.8 Consideration of Price Adjustment Mechanisms - § 399.13(a)(5)(E)

Consistent with SB 350, SCPA reviews the prospects of incorporating price adjustments in contracts with online dates more than 24 months after the date of contract execution. As noted in the ACR, such price adjustments could include price indexing to key components or to the Consumer Price Index.

5.11 Important Changes to Plans Noted

SCPA began service to Mendocino County June 1, 2017. The retail sales forecast now incorporates actual recorded data from this added load. The retail sales forecast also includes the impact of lost accounts due to the October 2017 Wildfires.

5.12 Redlined Copy of Plans Required

SCPA has attached a redline copy of its prior~~last year's~~ pPlan as Appendix B.

5.13 Safety Considerations

SCPA holds safety as a top priority. There are no unique safety issues related to SCPA's procurement of resources. Since SCPA does not own, operate, or control generation facilities, there are no present safety considerations to report.

Dated: October 8, 2018~~August 16, 2018~~

Respectfully submitted,



Rebecca Simonson
Power Services Manager
Sonoma Clean Power Authority
50 Santa Rosa Avenue, 5th Floor
Santa Rosa, CA 95404
Tel: (707) 890-8487
Email: rsimonson@sonomacleanpower.org

VERIFICATION

I, Geof Syphers am authorized to make this Verification on behalf of the Sonoma Clean Power Authority. I declare under penalty of perjury that the statements in the foregoing Updated 2018 Renewables Portfolio Standard Procurement Plan are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

Executed on October 8, 2018 at Santa Rosa, California.

/s/ Geof Syphers

Geof Syphers
Chief Executive Officer
Sonoma Clean Power Authority
50 Santa Rosa Avenue, 5th Floor
Santa Rosa, CA 95404
Telephone: (707) 978-3463
gsyphers@sonomacleanpower.org