

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



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08/20/18
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Order Instituting Rulemaking to Continue)
Implementation and Administration, and Consider)
Further Development, of California Renewables)
Portfolio Standard Program.)
_____)

Rulemaking 15-02-020
(Filed February 26, 2015)

**2018 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN
OF THE MONTEREY BAY COMMUNITY POWER AUTHORITY**

Tom Habashi
Chief Executive Officer
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Dated: August 20, 2018

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

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**2018 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN
OF THE MONTEREY BAY COMMUNITY 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”), the Monterey Bay Community Power Authority (“MBCP”) hereby submits this 2018 Renewables Portfolio Standard Procurement Plan (“RPS Procurement Plan”). As directed by the ACR, this RPS Procurement Plan includes responses for the issues expressed in ACR sections 5.1-5.8 and 5.11-5.13.

MBCP 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”). MBCP 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 MBCP reserves the right to challenge any such assertion of jurisdiction over these matters.

II. RPS PROCUREMENT PLAN

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

MBCP is a new CCA entity, which began providing service to commercial customers on March 1, 2018 and to residential customers on July 1, 2018. Customers served by MBCP are located within the counties of Monterey, Santa Cruz and San Benito. MBCP anticipates serving approximately 270,000 service accounts, which are expected to consume about 3,400 gigawatt hours per year. MBCP has entered into several power supply agreements, which will contribute to its RPS compliance during early-stage CCA operation and beyond. In addition, MBCP is currently engaged in contract negotiations to secure additional renewable energy supply, which will be necessary to support its longer-term renewable energy needs. MBCP expects to meet pertinent RPS compliance obligations during the coming twenty-year timeframe by entering into a variety of renewable energy supply agreements (in addition to contracts already secured at the time of this RPS Procurement Plan submittal). The exact portfolio characteristics selected may vary depending on resource availability, procurement costs, legislative and policy changes, technological improvements, preferences of the community, or other developments. To manage this future uncertainty, MBCP will examine and estimate supply and customer demand, and will structure its future procurement efforts to balance customer demand with requisite resource commitments. This examination of customer demand and other market developments will help reduce costs and assist in meeting planned procurement for the period reflected in the 2018 RPS Procurement Plan. MBCP will also consider the deliverability characteristics of its future generating resources placed under contract (such as the resource's dispatchability, available

capacity and typical production patterns) and will review 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, 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)

As of the date of this RPS Procurement Plan, MBCP has entered into one utility-scale renewable supply agreement with an eligible wind energy resource that is not yet commercially operational. This supply agreement is expected to support MBCP’s future RPS compliance obligations and voluntary renewable energy service options made available to MBCP customers. Additional information related to this supply agreement is reflected in the following table:

<u>Facility</u>	<u>Type</u>	<u>MW</u>	<u>Location</u>	<u>Status</u>
Duran Mesa Wind	Wind	90 MW	Torrance County, New Mexico	Deliveries to MBCP begin 01/21

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

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

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

MBCP closely monitors the development risk associated with its existing renewable energy supply commitment and is currently evaluating the need to adjust expected deliveries from such facility (or future renewable energy facilities placed under contract). MBCP does not believe that an adjustment to expected deliveries from the previously noted new wind facility is necessary, as the viability of this project is not in question at this time. As development

activities continue, MBCP will monitor project progress and will keep the Commission apprised of any changes regarding this determination in future RPS Procurement Plans. As with any development project, MBCP acknowledges the possibility that future renewable energy supply may not be delivered as expected or required under certain contracts. 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. MBCP 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)

MBCP has provided a quantitative assessment to support the qualitative descriptions provided in this RPS Procurement Plan, which is attached as Appendix A.

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

Presently, the renewable energy procurement policy that has been adopted by MBCP's Governing Board focuses on basic achievement of California's prescribed RPS procurement mandate. In consideration of its limited operating history and a primary focus on recent implementation activities, MBCP has not yet established definitive guidelines regarding its intended margin of over-procurement for requisite renewable energy supply. Staff assumes that, subject to Governing Board approval, the eventual margin of over-procurement adopted by MBCP may consider a variety of factors, including but not limited to, the operational status of prospective renewable energy facilities to be placed under contract, the experience and general development track record of each project development team (associated with new resources), resource size (capacity), and the location of prospective generating resources (for new facilities). Such considerations, amongst others, will be evaluated by MBCP in determining whether and to what extent a margin of over-procurement should be imputed in its planning process. To the

extent that MBCP anticipates planning risk related to its anticipated renewable energy contract commitments, it will determine an appropriate margin of over procurement. After MBCP's Governing Board engages in additional discussion regarding this concern and adopts related policy guidelines, such information will be communicated in a future RPS Procurement Plan.

**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), MBCP conducts bid solicitations for procuring requisite energy resources that are intended to identify available eligible renewable energy resources (reflecting locational preferences, when applicable, for such resources), generating capacity, and required online dates to assist in determining what resources fit best within MBCP's Governing Board-approved supply 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.

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

In the future, and consistent with SB 350, MBCP will review 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.

5.10 Cost Quantification

MBCP is currently considering voluntarily submitting cost quantification data to Commission Staff through an informal filing, subject to further guidance from the Commission on the ability of a CCA to submit the requested data under seal.

5.11 Important Changes to Plans Noted

MBCP has no changes to note, identify, or summarize from its prior Plan.

5.12 Redlined Copy of Plans Required

MBCP has attached a redline copy of its 2017 RPS Procurement Plan as Appendix B of this document.

5.13 Safety Considerations

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

Dated: August 20, 2018

Respectfully submitted,

/s/ Tom Habashi

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APPENDIX A
QUANTITATIVE RESPONSE

Renewable Net Short Calculations - 2018 RPS Procurement Plans

Monterey Bay Community Power
20-Aug-18

Input required

No input required

Variable	Calculation	Item	Deficit from RPS prior to Reporting Year	2011 Actual	2012 Actual	2013 Actual	2011-2013	2014 Actual
Forecast Year							CP1	
Annual RPS Requirement								
A		Total Retail Sales					-	
B		RPS Procurement Quantity Requirement (%)		20.0%	20.0%	20.0%		21.7%
C	A*B	Gross RPS Procurement Quantity Requirement (GWh)		-	-	-	-	-
D		Voluntary Margin of Over-procurement						
E	C+D	Net RPS Procurement Need (GWh)		-	-	-	-	-
RPS-Eligible Procurement								
Fa		Risk-Adjusted RECs from Online Generation						
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						
F	Fa+Fb+Fc-Fe	Total RPS Eligible Procurement (GWh)		-	-	-	-	-
F0		Category 0 RECs ³						
F1		Category 1 RECs ³						
F2		Category 2 RECs ³						
F3		Category 3 RECs ³						
Gross RPS Position (Physical Net Short)								
Ga	F-E	Annual Gross RPS Position (GWh)		-	-	-	-	-
Gb	F/A	Annual Gross RPS Position (%)		0%	0%	0%	0%	0%
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)		-	-	-	-	-
Lb	(F+Ia-Ib-Hc)/A	Annual Net RPS Position after Bank Optimization (%)		0%	0%	0%	0%	0%

Note: Values are to be shown in GWhs

Renewable Net Short Calculations - 2018 RPS Procurement Plans

Hard-coded

0.300

2015 Actual	2016 Actual	2014-2016	2017 Actual	2018 Forecast	2019 Forecast	2020 Forecast	2017-2020	2021 Forecast	2022 Forecast	2023 Forecast	2024 Forecast	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029 Forecast	2030 Forecast
		CP2		1	2	3	CP3	4	5	6	7	8	9	10	11	12	13
		-		2,320	3,331	3,342	8,993	3,349	3,357	3,364	3,372	3,379	3,387	3,395	3,402	3,410	3,421
23.3%	25.0%		27.0%	29.0%	31.0%	33.0%		34.8%	36.5%	38.3%	40.0%	41.7%	43.3%	45.0%	46.7%	48.3%	50.0%
-	-	-	-	673	1,033	1,103	2,808	1,165	1,225	1,288	1,349	1,409	1,466	1,528	1,589	1,647	1,711
				23	2	4	29	4	8	9	13	18	26	32	38	47	52
-	-	-	-	696	1,034	1,107	2,837	1,170	1,233	1,297	1,362	1,427	1,493	1,559	1,626	1,694	1,763
				700	867	605	2,172	140	110	-	-	-	-	-	-	-	-
				0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
				-	-	-	-	343	343	343	343	343	343	343	343	343	343
				0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
				-	167	502	669	686	780	954	1,019	1,084	1,150	1,216	1,283	1,351	1,419
				-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	700	1,034	1,107	2,841	1,170	1,233	1,297	1,362	1,427	1,493	1,559	1,626	1,694	1,763
				-	-	-	-	-	-	-	-	-	-	-	-	-	-
				700	1,034	1,107	2,841	1,170	1,233	1,297	1,362	1,427	1,493	1,559	1,626	1,694	1,763
				-	-	-	-	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	4	-	-	4	-	-	-	-	-	-	-	-	-	-
0%	0%	0%	0%	30%	31%	33%	32%	35%	37%	39%	40%	42%	44%	46%	48%	50%	52%
				-	-	-	-	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-	-	-	-	-	-
				700	867	605	2,172	140	110	-	-	-	-	-	-	-	-
				4	-	-	4	-	-	-	-	-	-	-	-	-	-
0%	0%	0%	0%	30%	31%	33%	32%	35%	37%	39%	40%	42%	44%	46%	48%	50%	52%

APPENDIX B

REDLINE COPY OF 2017 RPS PROCUREMENT PLAN

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

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Further Development, of California Renewables)
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Dated: August 20, 2018~~January 10, 2018~~

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**2018~~2017~~ RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN
OF THE MONTEREY BAY COMMUNITY POWER AUTHORITY**

I. INTRODUCTION

In accordance with the California Public Utilities Commission’s (“Commission”) [June 21, 2018](#)~~May 26, 2017~~ *Assigned Commissioner and Assigned Administrative Law Judge’s Ruling Identifying Issues and Schedule of Review for [2018](#)~~2017~~ Renewables Portfolio Standard Procurement Plans (“ACR”), and the ~~December 14, 2017 Decision Accepting Draft 2017 Renewables Portfolio Standard Procurement Plans (“D.17-12-007”)~~, the Monterey Bay Community Power Authority (“MBCP”) hereby submits this [2018](#)~~2017~~ Renewables Portfolio Standard Procurement Plan (“RPS Procurement Plan”). As directed by the ~~ACR and D.17-12-007~~⁺, this RPS Procurement Plan includes responses for the issues expressed in ACR sections [5.1-5.8 and 5.11-5.13](#)~~6.1-6.5, 6.7, 6.8, and 6.12-6.14~~.*

MBCP 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”). MBCP 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,

⁺ ~~D.17-12-007 at 69, Order 4.~~

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 MBCP reserves the right to challenge any such assertion of jurisdiction over these matters.

II. RPS PROCUREMENT PLAN

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

MBCP is a new CCA entity, which began providing service to commercial customers on March 1, 2018 and to residential customers on July 1, 2018 ~~plans to initiate customer service in March 2018.~~ Customers served by MBCP are located within the counties of Monterey, Santa Cruz and San Benito. ~~Following customer enrollments, which will occur over the course of a two-phased implementation schedule,~~ MBCP anticipates serving approximately 270,000 service accounts, which are expected to consume about 3,4600 gigawatt hours per year. MBCP has entered into several power supply agreements, which will contribute to its RPS compliance during early-stage CCA operation and beyond. In addition, ~~In anticipation of customer service commencement,~~ MBCP is currently engaged in contract negotiations ~~administering a competitive power supply solicitation~~ to secure the energy ~~additional renewable energy products supply, which will be necessary to support its longer-term renewable energy needs.~~ and services required to serve MBCP’s electric customers, including RPS-eligible renewable energy that will be procured to demonstrate RPS compliance as well as support MBCP’s voluntary renewable energy procurement targets (which exceed statewide RPS procurement mandates). MBCP expects to meet pertinent RPS compliance obligations during the coming twenty-year timeframe by entering into a variety of renewable energy supply agreements (in addition to contracts already secured at the time of this RPS Procurement Plan submittal). The exact portfolio

characteristics selected may vary depending on resource availability, procurement costs, legislative and policy changes, technological improvements, preferences of the community, or other developments. To manage this future uncertainty, MBCP will examine and estimate supply and customer demand, and will structure its future procurement efforts to balance customer demand with [requisite](#) resource commitments. This examination of customer demand and other market developments will help reduce costs and assist in meeting planned procurement for the period reflected in the ~~2018~~2017 RPS Procurement Plans. MBCP will also consider the deliverability characteristics of its future generating resources placed under contract (such as the resource’s dispatchability, ~~and~~ available capacity [and typical production patterns](#)) and will review 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, and provide value to the local community. A quantitative description of this forecast is attached to the RPS Procurement Plan in Appendix A.

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

[As of the date of this RPS Procurement Plan, MBCP has entered into one utility-scale renewable supply agreement with an eligible wind energy resources that is not yet commercially operational. This supply agreement is expected to support MBCP’s future RPS compliance obligations and voluntary, renewable energy service options made available to MBCP customers. Additional information related to this supply agreement is reflected in the following table:](#)

Facility	Type	MW	Location	Status
Duran Mesa Wind	Wind	90 MW	Torrance County, New Mexico	Deliveries to MBCP begin 01/21

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

5.36.3. Potential Compliance Delays - § 399.13(a)(5)(B)

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

5.46.4. Risk Assessment - § 399.13(a)(5)(F)

MBCP closely monitors the development risk associated with its existing renewable energy supply commitment and is currently evaluating the need to adjust expected deliveries from such facility (or future renewable energy facilities placed under contract). MBCP does not believe that an adjustment to expected deliveries from the previously noted new wind facility is necessary, as the viability of this project is not in question at this time. As development activities continue, MBCP will monitor project progress and will keep the Commission apprised of any changes regarding this determination in future RPS Procurement Plans. As with any development project, MBCP acknowledges the possibility that future renewable energy supply may not be delivered as expected or required under certain contracts. 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. MBCP considers this potential risk in forecasting as well as during procurement review and decision-making. ~~MBCP does not anticipate any particular development risk associated with planned renewable energy supply commitments, but the possibility always exists that future renewable energy supply will not be delivered as required under each respective contract. 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. MBCP considers this potential risk in forecasting as well as during procurement review and decision-making.~~

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

MBCP has provided a quantitative assessment to support the qualitative descriptions provided in this RPS Procurement Plan, which is attached as Appendix A.

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

Presently, the renewable energy procurement policy that has been adopted by MBCP's Governing Board focuses on basic achievement of California's prescribed RPS procurement mandate. In consideration of its limited operating history and a primary focus on recent implementation activities, MBCP has not yet established definitive guidelines regarding its intended margin of over-procurement for requisite renewable energy supply. Staff assumes that, subject to Governing Board approval, the eventual margin of over-procurement adopted by MBCP may consider a variety of factors, including but not limited to, the operational status of prospective renewable energy facilities to be placed under contract, the experience and general development track record of each project development team (associated with new resources), resource size (capacity), and the location of prospective generating resources (for new facilities). Such considerations, amongst others, will be evaluated by MBCP in determining whether and to what extent a margin of over-procurement should be imputed in its planning process. To the extent that MBCP anticipates planning risk related to its anticipated renewable energy contract commitments, it will determine an appropriate margin of over procurement. After MBCP's Governing Board engages in additional discussion regarding this concern and adopts related policy guidelines, such information will be communicated in a future RPS Procurement Plan.

5.7~~6.7~~. 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), MBCP conducts bid solicitations for procuring requisite energy resources that are intended to identify available ~~include specific needs for~~ eligible renewable energy resources (reflecting locational preferences, when applicable, for such resources), generating capacity, and required online dates to assist in determining what resources fit best within ~~its~~ MBCP's Governing Board-approved supply 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.

5.8~~6.8~~. Consideration of Price Adjustment Mechanisms - § 399.13(a)(5)(E)

In the future, and consistent with SB 350, MBCP will review 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.

5.10 Cost Quantification

MBPC is currently considering voluntarily submitting cost quantification data to Commission Staff through an informal filing, subject to further guidance from the Commission on the ability of a CCA to submit the requested data under seal.

5.11~~6.12~~. Important Changes to Plans Noted

~~As this is~~ MBCP's ~~initial RPS Procurement Plan~~, it has no changes to note, identify, or summarize from ~~its~~ a prior Plan.

5.12~~6.13~~. Redlined Copy of Plans Required

As MBCP ~~did not have a RPS Procurement Plan for 2016, it has not~~ attached a redline copy of its 2017 RPS Procurement Plan as Appendix B of this document~~last year's Plan~~.

5.13~~6.14~~. Safety Considerations

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

Dated: August 20, 2018~~January 10, 2018~~

Respectfully submitted,

/s/ Tom Habashi

Tom Habashi
Chief Executive Officer
Monterey Bay Community Power Authority
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Monterey, CA 93940
(888) 909-6227
tom.habashi@mbcommunitypower.org

VERIFICATION

I, Tom Habashi, am authorized to make this Verification on behalf of the Monterey Bay Community Power Authority. I declare under penalty of perjury that the statements in the foregoing 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 August 20, 2018 at Monterey, California.

/s/ Tom Habashi

Tom Habashi
Chief Executive Officer
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