

Docket No.: K.24-05-026

Exhibit No.: \_\_\_\_\_

Date: January 10, 2025

Witness: Byron Vosburg

**PREPARED DIRECT TESTIMONY OF BYRON VOSBURG  
ON BEHALF OF  
SAN DIEGO COMMUNITY POWER**

**PUBLIC**

## **TABLE OF CONTENTS**

<b>I. IDENTIFICATION .....</b>	<b>1</b>
<b>II. PURPOSE AND SUMMARY .....</b>	<b>3</b>
<b>III. SDCP'S EFFORTS TO PROCURE AUGUST 2023 SYSTEM RA.....</b>	<b>6</b>
<b>IV. SDCP'S EFFORTS TO INCLUDE THE IMPORT RESOURCE IN ITS AUGUST 2023 SUPPLY PLAN .....</b>	<b>12</b>
<b>V. SDCP MAINTAINED THE IMPORT RESOURCE .....</b>	<b>15</b>

1 **I. IDENTIFICATION**

2 **Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS FOR THE**  
3 **RECORD.**

4 A. My name is Byron Vosburg. I am the Chief Commercial Officer for San Diego Community  
5 Power ("SDCP").

6 **Q. PLEASE SUMMARIZE YOUR BUSINESS AND EDUCATIONAL**  
7 **BACKGROUND.**

8 A. I received my BS in Biological Sciences and MS in Civil and Environmental Engineering  
9 (Atmosphere and Energy Studies) from Stanford University. I began my career in 2011 at  
10 Pacific Gas & Electric ("PG&E") in the Energy Procurement group where I worked on the  
11 Energy Contract Management and Settlements team, the Real-Time Operations trading  
12 desk, and the Renewable Solicitations team. While on the Renewable Solicitations team, I  
13 was the commercial lead for PG&E's renewable feed-in tariff programs, supported the  
14 development of PG&E's Solar Choice "green tariff" program, and administrated PG&E's  
15 Renewable Auction solicitations.

16 In 2016, I joined Marin Clean Energy ("MCE") where my responsibilities included  
17 supply resource planning, managing MCE's annual Open Season solicitation, and  
18 negotiation, management, and settlement of power purchase agreements ("PPAs"). I also  
19 played a key role in MCE's procurement and resource solicitation operations. I was an  
20 integral part in a number of renewable PPAs, including closing the negotiations on PPAs  
21 delivering over 500 MW with \$900 million in notional value; I devised and administered  
22 a solicitation for custom-shaped, carbon-free energy deliveries; I led a solicitation for

1 multi-year renewable energy contracts to support MCE's September 2018 expansion; and  
2 I designed MCE's 2018 Open Season solicitation.

3 In 2018, I began working at The Energy Authority ("TEA"), where I primarily  
4 focused on procurement efforts to facilitate the start-up and expansion of Clean Power  
5 Alliance. I led solicitation-based and bilateral procurement of over \$1.7 billion dollars in  
6 energy hedging products, resource adequacy ("RA"), renewable and carbon-free energy,  
7 and energy storage transactions.

8 I joined San Diego Community Power ("SDCP") in February 2021. In my current  
9 role as SDCP's Chief Commercial Officer, I manage and oversee SDCP's portfolio of  
10 energy and capacity products, as well as SDCP's high-level procurement strategy and  
11 efforts to comply with SDCP's regulatory procurement obligations. I am responsible for  
12 overseeing SDCP's efforts to meet its RA compliance obligations and I have direct  
13 experience with SDCP's efforts to procure RA and ensuring that SDCP's procured RA  
14 resources are eligible to provide RA, including working with the California Independent  
15 System Operator ("CAISO").

16 **Q. HAVE YOU PREPARED A SUMMARY OF YOUR QUALIFICATIONS AND**  
17 **EXPERIENCE**

18 A. Yes. *Attachment BV-1* to this testimony summarizes my qualifications and experience.

19 **Q. HAVE YOU TESTIFIED PREVIOUSLY IN REGULATORY PROCEEDINGS?**

20 A. Yes. I provided prepared testimony on behalf of SDCP in connection with Proceeding No.  
21 K.21-11-001.

1 **Q. ON WHOSE BEHALF ARE YOU SUBMITTING TESTIMONY?**

2 A. I am providing this direct testimony on behalf of SDCP. SDCP is a Community Choice  
3 Aggregator (“CCA”) that began serving customers in San Diego Gas & Electric’s service  
4 territory in March 2021. Today, SDCP serves roughly 1 million customers in the City and  
5 County of San Diego, and the cities of Chula Vista, La Mesa, Encinitas, and Imperial  
6 Beach. As a load-serving entity in California, SDCP is subject to the California Public  
7 Utilities Commission’s resource adequacy compliance program, as well certain other  
8 compliance obligations.

9 **Q. ARE YOU SPONSORING ANY ATTACHMENTS WITH YOUR TESTIMONY?**

10 A. Yes.

- 11 • Attachment BV-1: Byron Vosburg Resume.
- 12 • Attachment BV-2: Email Correspondence with CAISO.
- 13 • Attachment BV-3: Email Correspondence with Nathan Christo.

14 **II. PURPOSE AND SUMMARY**

15 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

16 A. The purpose of my testimony is to detail the events related to SDCP’s August 2023 month-  
17 ahead RA compliance filing. My testimony discusses SDCP’s year-ahead and month-ahead  
18 compliance obligations for August 2023, SDCP’s experience in the market for summer  
19 2023 RA resources, SDCP’s extensive efforts to comply with its August 2023 month-ahead  
20 compliance obligation, and SDCP’s efforts to ensure it provided as much capacity as  
21 possible to the CAISO energy market in August 2023, even after the August 2023 month-  
22 ahead compliance deadline had passed.

1   **Q.     PLEASE SUMMARIZE YOUR TESTIMONY.**

2   A.     In recent years, SDCP, like all load serving entities (“LSEs”), has found itself squeezed by  
3           California’s constrained RA market. SDCP has found that RA supply is limited,  
4           particularly for the summer months. SDCP has also learned that this limited supply means  
5           high prices. These challenges are particularly acute in the hunt for System RA since the  
6           Commission provides no opportunity for an LSE to waive out of its System RA obligations  
7           regardless of the market conditions it faces.

8           SDCP worked hard in 2022 and 2023 to navigate this challenging market and  
9           strived for full compliance with its August 2023 year-ahead and month-ahead System RA  
10          compliance obligations. SDCP did so while also working to avoid over procurement of RA  
11          resources or forcing its customers to shoulder unnecessary costs. Unfortunately, projects  
12          SDCP intended to rely on for August 2023 System RA suffered delays, eventually to the  
13          point where they could no longer provide RA for August 2023. In the end, SDCP was  
14          unable to procure enough System RA to meet its month-ahead System RA compliance  
15          obligation for August 2023 by the time it filed its August 2023 month-ahead compliance  
16          filing on June 19, 2023. Energy Division thus notified SDCP that it was deficient for  
17          August 2023 and granted SDCP five business days to cure some or all of its deficiency.  
18          SDCP had until Friday, June 30, 2023, (Cure Period) to refile its August 2023 month-ahead  
19          showing with the Commission illustrating any additional procurement.

20          During that Cure Period, SDCP made significant strides toward fulfilling its August  
21          2023 compliance obligation, procuring 326.19 MW of capacity eligible to provide August  
22          2023 RA. That cure-period procurement fully eliminated the incremental deficiency SDCP  
23          had between its year-ahead filing for August 2023 and its month-ahead filing for August

1 2023, and it meant that SDCP sourced more than 99 percent of its August 2023 RA  
2 obligation when adding together what SDCP actually procured and SDCP's demand  
3 response allocation. Part of this cure-period procurement of 326.19 MW of August 2023  
4 RA included 7 MW of capacity from a non-resource-specific import resource (Import  
5 Resource). SDCP also secured associated import transmission rights for that Import  
6 Resource.

7 Unfortunately, because the Import Resource was a new resource for the CAISO  
8 market, it did not have a corresponding Resource ID within CAISO's system. After  
9 securing a contract for the Import Resource on the afternoon of June 30, 2023, SDCP  
10 immediately contacted CAISO to request the creation of a Resource ID for the Import  
11 Resource so that SDCP could include the Import Resource on its CAISO Supply Plan.  
12 Unfortunately, June 30, 2023, was a Friday, and it was largely a holiday weekend since  
13 July 4, 2023, was the following Tuesday. I and other SDCP personnel corresponded with  
14 representatives from CAISO throughout the weekend to create a Resource ID for the  
15 Import Resource by the time CAISO locked August 2023 supply plans on July 2, 2023,  
16 and even petitioned CAISO for a late amendment to SDCP's August 2023 Supply Plan.

17 Unfortunately, those efforts were unsuccessful, and there was a mismatch between  
18 SDCP's August 2023 month-ahead RA showing and its July 3, 2023 CAISO Supply Plan  
19 for August 2023. CAISO created a Resource ID for the Import Resource on July 4, 2023.  
20 According to SDCP's July 3, 2023 August 2023 Supply Plan, SDCP's August 2023  
21 procurement was more than one percent short of SDCP's obligation even though, with the  
22 7 MW of the Import Resource included, SDCP had actually secured more than 99 percent  
23 of its August 2023 obligation. And critically, SDCP maintained the Import Resource

1 throughout August 2023. SDCP thus actually provided to CAISO and the California grid  
2 more than 99 percent of its August 2023 obligation, including the Import Resource, in  
3 August 2023.

4 In fact, energy from the Import Resource was transacted in the marketplace  
5 throughout August 2023. Therefore, the only way in which SDCP was *more than* one  
6 percent short of its August 2023 compliance obligation was on paper. SDCP in fact  
7 procured *and provided* more than 99 percent of its August 2023 RA obligation to the  
8 California energy market.

9 **Q. WHAT RELIEF DOES SDCP SEEK THROUGH THIS CITATION APPEAL?**

10 A. SDCP does not object to the monetary fine the Consumer Protection and Enforcement  
11 Division (“CPED”) levied against it in connection with its August 2023 deficiency.  
12 SDCP, however, seeks relief from the two penalty points CPED assessed to SDCP in  
13 connection with that deficiency since SDCP actually procured more than 99 percent of its  
14 August 2023 RA obligation.

15 **III. SDCP’S EFFORTS TO PROCURE AUGUST 2023 SYSTEM RA**

16 **Q. DID SDCP TIMELY FILE A YEAR-AHEAD RA SHOWING FOR 2023?**

17 A. Yes. SDCP submitted its 2023 year-ahead RA showing on October 31, 2022, and submitted  
18 a revised version of that showing on December 16, 2022.

19 **Q. DID SDCP MEET ITS COMPLIANCE OBLIGATION IN ITS YEAR-AHEAD RA**  
20 **SHOWING FOR AUGUST 2023?**

21 A. No. SDCP’s year-ahead filings showed that SDCP did not meet its year-ahead RA  
22 obligations for certain summer months, including a System RA deficiency for August 2023  
23 of 124.82 MW.

1   **Q.    WAS SDCP CITED FOR THAT YEAR-AHEAD RA DEFICIENCY?**

2   A.    Yes. CPED issued Citation E-4195-0152 to SDCP for SDCP's inability to meet its 2023  
3       year-ahead System RA obligations, including its August 2023 year-ahead obligation.

4   **Q.    DID SDCP RESOLVE CITATION E-4195-0152?**

5   A.    Yes. SDCP paid the fine associated with Citation E-4195-0152 without protest or appeal.

6   **Q.    DESCRIBE THE MARKET FOR AUGUST 2023 SYSTEM RA AND SDCP'S 2023**  
7       **YEAR-AHEAD AND AUGUST 2023 MONTH-AHEAD FILINGS.**

8   A.    SDCP found challenging System RA market conditions in the lead up to both its 2023 year-  
9       ahead showing and its August 2023 month-ahead showing. Despite its broad participation  
10      in the market for system RA, SDCP was short of its obligation for August 2023 when it  
11      came time to make its 2023 year-ahead system RA showing. CPED cited SDCP for that  
12      deficiency and SDCP paid the substantial fine associated with that year-ahead filing  
13      deficiency.

14           After submitting its 2023 year-ahead RA showing, SDCP worked diligently to close  
15      its August 2023 deficiency before the August 2023 month-ahead compliance deadline.  
16      Unfortunately, the challenging market for August 2023 system RA persisted and resources  
17      SDCP expected to rely on to fulfill its August 2023 system RA obligation were delayed for  
18      reasons outside of SDCP's control. SDCP experienced delays in two long-term PPAs, both  
19      of which were signed in 2021, and which would have provided hundreds of MW of August  
20      2023 System RA. These delays were not confirmed until January and March of 2023,  
21      limiting SDCP's ability to find replacement RA capacity in an already-tight market.

22           Nonetheless, after receiving notice of these project delays, SDCP endeavored to  
23      find August 2023 System RA via multiple solicitations and constant bilateral outreach. But

SDCP found that other market participants were similarly situated, with little, if any, excess RA available, and uncertain developing resource portfolios. SDCP remained in discussion with multiple investor-owned utilities (“IOUs”), many renewable and storage developers, power marketers, and fellow CCAs to identify available supply as it became available. A number of these entities ended up unable to sell August 2023 System RA due to their own resource delays.

These delays and continuing market challenges meant that SDCP was again short of its August 2023 RA obligation when SDCP made its August 2023 month-ahead filing on June 19, 2023. In that month-ahead filing, SDCP showed a deficiency for August 2023 that was greater than the deficiency it showed for August 2023 in its 2023 year-ahead filing. Energy Division issued SDCP a month-ahead deficiency notice for August 2023 and provided SDCP a deadline of June 30, 2023, to come into compliance. I refer to that five-business day period, immediately preceding the Fourth of July holiday, as the “Cure Period.”

**Q. HOW DID SDCP RESPOND TO ENERGY DIVISION’S MONTH-AHEAD DEFICIENCY NOTICE?**

A. Because of SDCP’s consistent outreach and procurement efforts prior to June 23, 2023, SDCP was able to respond to that month-ahead deficiency notice immediately and secure additional August 2023 RA. Between June 23, 2023, when Energy Division issued its deficiency notice, and June 30, 2023, SDCP procured more than 326.19 MW of additional August 2023 RA. As a last-resort part of that procurement effort, SDCP purchased seven megawatts of non-resource-specific import RA (again, the Import Resource) and associated import transmission rights. SDCP’s extensive procurement efforts during that

1 brief cure period fully eliminated the month-ahead deficiency in its August 2023 system  
2 RA procurement that was incremental to its year-ahead deficiency.<sup>1</sup> SDCP's efforts meant  
3 that SDCP reported to Energy Division more than 99 percent of its total August 2023  
4 system RA obligation by June 30, 2023, through its actual procurement and its demand  
5 response allocation.

6 **Q. DID SDCP FIND CONTINUING CHALLENGING MARKET CONDITIONS**  
7 **DURING THE CURE PERIOD?**

8 A. Yes. Although SDCP was able to procure a significant amount of capacity during the Cure  
9 Period, it continued to experience challenging market conditions. Although SDCP was  
10 eventually able to sign five contracts during the Cure Period with an IOU, a power  
11 marketer, and a CCA, SDCP found that other sellers *with available capacity* were  
12 unwilling to transact during the Cure Period because key staff were out of the office or  
13 because of an unwillingness to activate key seller personnel for a potential transaction  
14 during the Cure Period.

15 **Q. DID THOSE CHALLENGES CAUSE SDCP TO STOP ITS CURE PERIOD**  
16 **PROCUREMENT EFFORTS?**

17 A. No. Despite those roadblocks, SDCP continued to seek out creative ways to minimize its  
18 August 2023 System RA deficiency as much as possible. This included, as a last resort,  
19 investigating, developing, and eventually agreeing to a transaction for the Import Resource  
20 for which SDCP would serve as the importer of record and scheduling coordinator—a deal  
21 structure and role then new to SDCP.

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<sup>1</sup> Citation No. E-4195-0173 at 3-4 (explaining that although SDCP did not meet its August 2023 month-ahead system RA obligation, after the month-ahead cure period SDCP had no deficiency incremental to its August 2023 year-ahead deficiency).

1           This required a complex transaction. With time running out in the Cure Period,  
2           SDCP had to seek out not just available capacity, but also matching import rights either  
3           that it owned already or that it could procure in short order. This method of trying to close  
4           SDCP's open position was a last resort for SDCP because SDCP knew that contracting for  
5           import RA was likely more costly than non-import RA and would impose additional cost  
6           and administrative burden on SDCP to handle its responsibilities as the importer of record.  
7           SDCP also knew that finalizing the deal would be administratively more complicated.  
8           Nonetheless, SDCP dug into this option in a good faith effort to source and procure as  
9           much August 2023 RA as it possibly could during the Cure Period.

10           SDCP finalized the deal for that Import Resource on June 30, 2023, the final day  
11           of the cure period, at 3:23pm PT. While this deal did not fully eliminate SDCP's short  
12           position, SDCP procured it anyway to close as much of that position as possible.

13   **Q.    WAS THE IMPORT RESOURCE AN EXISTING RESOURCE WITHIN THE**  
14   **CAISO SYSTEM?**

15   A.    No.

16   **Q.    WHAT FURTHER COMPLEXITY DID THAT CREATE?**

17   A.    Because the Import Resource was new to SDCP and the CAISO system, SDCP had to work  
18           with CAISO to create a Resource ID for the Import Resource for SDCP to be able to include  
19           the Import Resource in SDCP's August 2023 CAISO supply plan. Despite numerous  
20           efforts from SDCP, CAISO was unable to create a Resource ID for the Import Resource  
21           either on June 30, 2023, when SDCP requested creation of the Resource ID, or before July  
22           2, 2023, when CAISO locked August 2023 supply plans. CAISO created a Resource ID  
23           for the Import Resource on July 4, 2023. The lack of a Resource ID for the Import Resource

1 was the resource's only flaw. The Import Resource was otherwise fully eligible to provide  
2 August 2023 System RA.

3 As a result, SDCP's actual procurement of August 2023 System RA, plus its  
4 demand response allocation for August 2023 System RA which counted toward SDCP's  
5 compliance obligation, exceeded 99 percent of SDCP's August 2023 System RA  
6 obligation. And CAISO had access to more than 99 percent of SDCP's obligation—  
7 including the Import Resource throughout August 2023. It was only on paper that SDCP  
8 failed to satisfy more than 99 percent of its August 2023 RA obligation.

9 **Q. WHAT WAS THE EFFECT OF SDCP'S CURE-PERIOD PROCUREMENT?**

10 A. SDCP had a system RA requirement for August 2023 of [REDACTED] MW. After SDCP's cure-  
11 period procurement efforts, SDCP's second revised August 2023 month-ahead compliance  
12 filing showed that SDCP had actually procured [REDACTED] MW of August 2023 system RA.  
13 In addition, SDCP had a demand response allocation for August 2023 of [REDACTED] MW which  
14 counts toward SDCP's procurement obligation. As such, SDCP's second-revised August  
15 2023 month-ahead compliance filing illustrated that SDCP's August 2023 deficiency was  
16 less than one percent of SDCP's August 2023 system RA obligation when SDCP's actual  
17 procurement is taken into account, as follows:

- 18 • [REDACTED] MW (SDCP's August 2023 System RA obligation) – [REDACTED] MW (SDCP's demand  
19 response allocation for August 2023 System RA) – [REDACTED] MW (SDCP's total, actual  
20 System RA procurement for August 2023) = [REDACTED] MW (SDCP's August 2023 System  
21 RA deficiency when accounting for all August 2023 resources SDCP actually procured  
22 and for SDCP's demand response allocation).
- 23 • [REDACTED] MW / [REDACTED] MW = 0.998 percent.

1 Said another way, SDCP's August 2023 deficiency was less than 1 percent of its  
2 obligation, and, when SDCP's actual procurement is considered, SDCP met more than 99  
3 percent of its August 2023 System RA requirement.

4 **IV. SDCP'S EFFORTS TO INCLUDE THE IMPORT RESOURCE**  
5 **IN ITS AUGUST 2023 SUPPLY PLAN**

6 **Q. PLEASE DESCRIBE SDCP'S EFFORTS TO INCLUDE THE IMPORT**  
7 **RESOURCE IN SDCP'S AUGUST 2023 SUPPLY PLAN.**

8 A. SDCP finalized its transaction for the Import Resource at or around 3:23pm PT on Friday,  
9 June 30, 2023, and its efforts to create a Resource ID for the Import Resource began almost  
10 immediately. SDCP personnel submitted an email request to CAISO for the creation of  
11 several Resource IDs, including for the Import Resource, at 4:36pm PT on June 30, 2023.  
12 Shortly thereafter, I submitted a ticket through CAISO's ticketing system highlighting  
13 SDCP's earlier email request and explaining that time was of the essence in creating the  
14 Resource ID for the Import Resource given the impending deadline to finalize supply plans  
15 for August 2023. I then followed up with another email to CAISO a few minutes later.

16 A representative from CAISO responded the following day, Saturday, July 1, 2023,  
17 stating that they would try and see if a member of the team that was responsible for creating  
18 Resource IDs was available to assist over the holiday weekend. I corresponded regularly  
19 with representatives of CAISO throughout the next several days. Unfortunately, despite  
20 CAISO's responsiveness—which I and SDCP appreciated greatly—CAISO was not able  
21 to create a Resource ID for the Import Resource before Supply Plans for August 2023 were  
22 locked on July 2, 2023.

23 Representatives from CAISO confirmed, however, that SDCP could request leave  
24 from CAISO to submit a late revision to SDCP's August 2023 supply plan pursuant to the

1 terms of the CAISO tariff. CAISO also confirmed that a Resource ID for the Import  
2 Resource would be available on July 4, 2023.

3 I followed CAISO's suggestion to submit a request for a late revision to its August  
4 2023 supply plan, submitted that request via CAISO's ticketing system, and followed up  
5 with confirmation via email. I explained in that request that the requested relief was limited  
6 to a very small capacity amount and was only necessary to accommodate limited  
7 administrative action. I then communicated regularly with representatives from CAISO as  
8 CAISO reviewed SDCP's request for a late revision to the August 2023 Supply Plan.  
9 Unfortunately, CAISO ultimately denied this request.

10 True and correct copies of my correspondence with CAISO throughout this  
11 process are attached as *Attachment BV-2*.

12 **Q. WHAT WAS THE PRACTICAL IMPACT OF THE FACT THAT THE IMPORT**  
13 **RESOURCE WAS NOT INCLUDED IN SDCP'S AUGUST 2023 SUPPLY PLAN?**

14 A. Essentially the only practical impact of the fact that the Import Resource was not included  
15 in SDCP's August 2023 Supply Plan is that SDCP was ultimately unable to rely on that  
16 resource—on paper—to help SDCP reach its August 2023 System RA compliance  
17 obligation.

18 Because of SDCP's early and consistent outreach to CAISO regarding the existence  
19 of the Import Resource, CAISO had actual and effective confirmation that it and the  
20 CAISO system could rely on the Import Resource to provide capacity if needed in August  
21 2023 even though it was not included on SDCP's August 2023 Supply Plan. To the best of  
22 my knowledge, CAISO did not conduct or require any backstop procurement related to the

1 Import Resource or related to SDCP's remaining, post-Cure Period August 2023 System  
2 RA deficiency more generally.

3 **Q. WAS THE LIMITED PRACTICAL IMPACT ASSOCIATED WITH THE**  
4 **ABSENCE OF THE IMPORT RESOURCE ON SDCP'S AUGUST 2023 SUPPLY**  
5 **PLAN SURPRISING TO YOU?**

6 A. No. Given the fact that representatives of CAISO were fully informed of the Import  
7 Resource and that SDCP had secured the Import Resource to provide capacity in August  
8 2023, plus the fact that the Import Resource was a very small piece of SDCP's total August  
9 2023 System RA procurement and compliance obligation, plus the fact that SDCP's  
10 remaining deficiency for August 2023 System RA was also very small, I am not surprised  
11 that CAISO never ordered or conducted backstop procurement to address these issues.

12 **Q. DID YOU EVER CORRESPOND WITH REPRESENTATIVES FROM THE**  
13 **COMMISSION REGARDING THE IMPORT RESOURCE?**

14 A. Yes. In February 2024, Nathan Christo from the Commission's Utilities and Enforcement  
15 Branch contacted me regarding SDCP's month-ahead August 2023 System RA compliance  
16 efforts. I voluntarily confirmed with Mr. Christo that SDCP was unable to fully close its  
17 August 2023 System RA short position and that the Import Resource was not included on  
18 SDCP's July 3, 2023 August 2023 Supply Plan. I then explained the circumstances that  
19 gave rise to that absence and requested that the Commission consider the Import Resource  
20 eligible for the purposes of calculating any RA deficiency and/or penalty. That request was  
21 rejected, as evidenced by the citation giving rise to this proceeding.

22 A true and correct copy of my correspondence with Mr. Christo is attached as  
23 *Attachment BV-3*.

1                   **V.   SDCP MAINTAINED THE IMPORT RESOURCE**

2   **Q.   DID SDCP ABANDON THE IMPORT RESOURCE AFTER IT LEARNED THAT**  
3       **IT WOULD NOT BE INCLUDED ON SDCP'S AUGUST 2023 SUPPLY AND THAT**  
4       **IT WOULD LIKELY NOT COUNT TOWARDS SDCP'S AUGUST 2023 RA**  
5       **COMPLIANCE SHOWING?**

6   A.   No. I and SDCP understood that because the Import Resource was not included on SDCP's  
7       July 3, 2023 August 2023 CAISO Supply Plan it was unlikely that the Import Resource  
8       would count toward SDCP's August 2023 System RA obligation. Nonetheless, SDCP fully  
9       maintained its rights to that resource in a good faith effort to provide as much capacity to  
10      the CAISO market in the high-stress summer months as possible. That meant that SDCP  
11      made the payments that it was obligated to make under the terms of the contracts that  
12      secured the Import Resource for SDCP's use in August 2023, including for both the Import  
13      Resource itself and the import rights SDCP contracted for to operationalize the Import  
14      Resource.

15 **Q.   WHAT DID THAT DECISION MEAN IN PRACTICAL TERMS?**

16 A.   As a result of SDCP's decision to maintain the Import Resource, the Import Resource in  
17      fact supplied energy to the California grid during August 2023. I have personal knowledge  
18      of this fact, and also the fact that SDCP received CAISO revenues in connection with the  
19      sale of energy from the Import Resource into the CAISO marketplace in August 2023.

20 **Q.   DOES THIS CONCLUDE YOUR TESTIMONY?**

21 A.   Yes.

**ATTACHMENT BV-1  
BYRON VOSBURG RESUME.**

**Byron Vosburg**  
San Diego, CA

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**San Diego Community Power (SDCP)**

San Diego, CA

**Chief Commercial Officer**

[2021 - present]

**Procurement**

- Responsible for SDCP's portfolio of energy and capacity products from start-up in March 2021, through two phases of customer expansion, and into steady-state operation as the second-largest CCA in CA
  - Physical power hedges and system, local, flexible, and import resource adequacy (RA) products to meet anticipated requirements of 1,800 MW summer peak and 8,100 GWh annual customer usage; renewable and carbon-free energy to exceed 50% and 55% targets, respectively, of "PowerON" service offering and 100% renewable energy supply for "Power100" premium service offering
  - Oversee active management of energy, RA, and environmental portfolios
  - Ensure compliance with all annual and monthly Resource Adequacy filings – including three-year forward requirements for Local Reliability Areas – despite regulatory flux in an opaque, inefficient, and tightening market
- Devised and oversaw high-level procurement strategy to ensure cost-effective compliance with complex RA and Renewable Portfolio Standard (RPS) compliance requirements and ambitious voluntary renewable targets as a new, lean participant in a highly competitive, volatile market environment
- Formalized and implemented energy hedging and risk management strategies
- Oversaw negotiation of over 2.5 GW of long-term off-take from wind, solar-plus-storage, and stand-alone storage facilities
- Deeply involved in regulatory policy strategy related to CPUC and CAISO proceedings regarding RA, RPS, Integrated Resource Planning (IRP), Power Charge Indifference Adjustment (PCIA), and Provider of Last Resort (POLR)

**Leadership**

- Manage team of eleven employees and multiple consulting firms, staffing plan for team expansion to 12-15 employees
- As a member of SDCP's Executive Team, contribute to organizational strategy, staffing, budgeting, and policy development
- Provide energy procurement training to SDCP executives, board members, and committees
- Present regularly to SDCP Board of Directors and committees

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**The Energy Authority**

Bellevue, WA

**Portfolio Manager**

[2018 – 2021]

**Procurement**

- Designed, constructed, and managed ~\$700 million/year energy portfolio with Clean Power Alliance of Southern California (CPA) from start-up, through five phases of customer expansion, and into steady-state operation
  - Transacted over \$1.7 billion of energy products via: physical power hedges up to 2500 MW peak load; system, local, flexible, and import resource adequacy (RA) products to meet 2400 MW summer peak requirement; renewable and carbon-free energy to exceed 60% and 72% targets, respectively, of 11,500 GWh/year supply
  - Rebalanced energy, RA, and environmental portfolios as load forecasts, financial projections, and CCA program goals shifted, ensuring program viability and achievement of financial objectives
  - Ensured compliance with all annual and monthly Resource Adequacy filings – including three-year forward requirements for Local Reliability Areas – despite regulatory flux in an opaque, inefficient, and tightening market
- Created position management tools to visualize the following positions: energy (hourly, monthly, and annually); RA (system, local, flex); environmental (PCC1, PCC2, PCC3, carbon-free)

- Formalized and implemented client energy hedging strategies, including monthly position review and procurement
- Coordinated with clients and suppliers to structure mutually beneficial, non-standard shaped energy transactions
- Led Compliance Period 3 (2017-2020) RPS compliance review, transacted to re-balance client portfolios
- Negotiated long-term contracts for off-take from wind, solar-plus-storage, and stand-alone storage facilities

#### Risk Management

- Developed and revised Energy Risk Management Policies, including procurement schedules and hedging plans
- Modeled client portfolios and procurement in TEA's stochastic model; iterated with TEA staff to enhance the tool
- Projected power supply costs, at times with daily granularity, to ensure clients' financial success

#### Leadership

- Initiated weekly, internal California Client and Portfolio Review meetings
- Participated in TEA's inaugural Leadership Development program via Wildsparq
- Provided procurement training to client executives, on-boarded client leadership
- Presented ad hoc to client Boards of Directors and committees, monthly to Risk Management Teams

### **MCE (f.k.a. Marin Clean Energy)**

San Rafael, CA

#### **Power Supply Contracts Manager**

[2016 - 2018]

##### Competitive Solicitation and Negotiation

- Negotiated five long-term Power Purchase Agreements (PPAs), totaling 500 MW and \$900 million in notional value, including innovative credit terms and capacity optionality to facilitate potential service territory expansion
- Devised and administered request for offers (RFO) for short-term, custom-shaped, carbon-free energy deliveries
- Led 2018 Short-Term PCC1 RFO, which committed over \$42 million to fulfill volume target (1,500 GWh) well below cost targets (\$11/MWh average net market value)

##### Contract Management and Settlement

- Actively managed a 3,000 GWh/yr portfolio of renewable, carbon-free, and conventional energy and resource adequacy contracts; Ensured compliance with regulatory mandates and voluntary environmental targets;
- Optimized scheduling procedures for renewable resources to optimize market revenue and reduce risk
- Validated monthly energy invoices, many of which frequently surpassed \$1 million
- Documented processes related to resource planning, contract administration, invoice validation, and solicitations

##### Resource Planning

- Project manager and lead author of 2017 and 2018 Integrated Resource Plans, the former of which was described as the "gold standard" by The Utility Reform Network (TURN) during CPUC Feb 2017 CCA En Banc Hearing

##### Leadership

- Supervised two Power Resources employees; led larger team and consultants during Director's vacation and leave
- Hired, on-boarded, and trained four Power Resources employees
- Co-led monthly internal manager meetings, facilitating discussion regarding best management practices

### **Pacific Gas and Electric Company**

San Francisco, CA

#### **Senior Renewable Energy Analyst**

[2015 - 2016]

- Lead transactor for renewable feed-in tariff (ReMAT), responsible for application review, coordination of bi-monthly auctions, transaction origination and amendment, compliance reporting, and financial, commercial, and legal analyses

#### **Real Time Asset Manager**

[2013 - 2015]

- Managed scheduling, dispatch, trades, and outages in hour-ahead, fifteen-minute, and five-minute CAISO markets for PG&E's Renewable (5,000 MW) and Qualifying Facility and Combined Heat and Power (QF/CHP) (3,000 MW) portfolios
- Contributed to development of procedures regarding overgeneration management and renewable curtailments

#### **Contract Management Analyst**

[2011 - 2013]

- Administered and interpreted 300 QF PPAs; implemented 2011 QF/CHP Settlement PPAs, programs, and pricing
- Automated calculation of Qualifying Facility (QF) energy prices, payments of which surpassed \$1 billion annually
- Negotiated bilateral operating, scheduling, and curtailment procedures and dispute settlements in excess of \$1 million
- Collected and evaluated annual QF Compliance Monitoring data from over 100 QFs

---

## Tesla Motors

San Carlos, CA

### Energy Efficiency Intern

[2009]

- Devised and implemented efficiency upgrades to office and production facilities; contributed to LEED-caliber retrofit
- Analyzed environmental impact of employee commutes and proposed actionable GHG reduction measures

---

## Stanford University

Stanford, CA

### M.S. Civil and Environmental Engineering | Atmosphere and Energy

[2010]

- Emphasis on creative development, finance, and integration of efficient and renewable energy projects to economically reduce GHG emission and fossil fuel dependence. Analyses include:
  - “A Californian Renewable Energy Portfolio: Nuclear, Wind, PV, and EV Potential in 2030”
  - “A Futuristic Vision of Wind: Planning a Mid-West Transmission Infrastructure”
  - “The Role of Transportation in Athletics CO<sub>2</sub> Emissions: A Stanford Stadium Case Study”

### B.S. Biological Sciences | Economics Minor

[2009]

Tour Guide and Student Manager - Stanford University Visitor Information Services

[2007 - 2010]

---

## Certifications

- NFA Series 3 (No longer active): National Commodities Futures Exam (Registered as Associated Person with NFA)
- NFA Series 30 (No longer active): Branch Manager Exam

**ATTACHMENT BV-2**  
**EMAIL CORRESPONDENCE WITH CAISO.**

## Customer Service Community

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Case: 00264123

### Case Information

Review for Price Correction	<input type="checkbox"/>	Metering Inquiry	<input type="checkbox"/>
Case Number	00264123	Status	Closed
Functional Environment	Production	SCID Account Owner	San Diego Community Power (SDCP_MK)
Follow-up Date	7/17/2023	SCID	SDCP

### Description Section

Category	Master File
Subject	Time-sensitive - Import Resource ID Creation for Aug RA
Description	<p>Hi CAISO team, Apologies for the last-minute request here. Asikeh Kanu at SDCP submitted, via email at 4:44pm PST, a request to create new import Resource IDs for purposes of importing firm energy to meet CAISO and CPUC RA requirements. (We did not anticipate needing these until a couple of deals fell through and our only 11th-hour option is to purchase firm energy.) If at all possible, can you please review and approve these in time for submission of an updated RA Plan and Supply Plan prior to 7/2 deadline and final cross validation for Aug RA submission? If it helps, only the [REDACTED] point is critical for August, so any effort to include at least this one ResID prior to 7/2 would be very much appreciated. Feel free to reach out with any questions or if there is anything else we can provide to facilitate an expedited review.</p> <p>Many thanks, Byron Vosburg Managing Director, SDCP bvosburg@sdcommunitypower.org 619-880-6545</p>
Resolution	<p>Hello Byron,</p> <p>We will create the new resources in Production Master File on 7/3/2023 with an effective date of 7/6/2023.</p> <p>Best wishes, Steve</p>

### Detailed Information

Trade Date	Trade Hours
Resource ID	Market

### Submitter Information

SDCP000001

Contact Name Byron Vosburg

Contact Email bvosburg@sdcommunitypower.org

Contact Phone 707-478-9767

Email Recipients bvosburg@sdcommunitypower.org,  
ra@sdcommunitypower.org,  
powercontracts@sdcommunitypower.org

---

**System Information**

Date/Time Opened 6/30/2023 5:37 PM

Date/Time Closed 7/18/2023 5:15 PM

**Contact Information**Emergency Primary Contact ☐Emergency Secondary Contact ☐Emergency ISO Contact  
Owner

Phone 707-478-9767

Contact Owner Provision API

Mobile

Name Byron Vosburg

Email bvosburg@sdcommunitypower.org

Account Name San Diego Community Power (SDCP\_MK)

Reports To

Title

CR Emergency ISO Contact

AM Emergency ISO Contact Primary

Client Employee Role

LDAP User ☐

LDAP UID BVOSBURGx17611

Contact Type

---

**Address Information**

Mailing Address

Other Address

---

**Additional Information**

Fax

Lead Source

Home Phone

Last Stay-in-Touch Request  
Date

Other Phone

Last Stay-in-Touch Save Date

Assistant

Birthdate

Asst. Phone

Department

Description

SDCP000002

**System Information**

Created By	CIDI Webservice, 3/4/2021 12:43 PM	Last Modified By	AppConfig User, 9/28/2022 9:00 PM
Custom Links	<a href="#"><u>Google Search</u></a> <a href="#"><u>Yahoo! Weather</u></a>	<a href="#"><u>Google Maps</u></a>	<a href="#"><u>Send Gmail</u></a>

From: Asikeh Kanu MAILER-DAEMON

Subject: RE: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

Date: July 2, 2023 at 2:55 PM

To: Mohammed-Ali, Abdulrahman amohammedali@caiso.com, Richardson, Mark marichardson@caiso.com

Cc: Byron Vosburg BVosburg@sdcommunitypower.org, RA RA@sdcommunitypower.org, Power Contracts PowerContracts@sdcommunitypower.org, Quintavalla, Ginger GQUINTAVALLA@caiso.com

AK

Hello All,

It appears that portal submission is closed in advance of COB 7/2.

## Upload Supply Plan

The plan submission time has elapsed for the selected month

Submittal Type	Month Ahead ▾
Target Period	August ▾ Month 2023 ▾ Year
SCID	SDCP ▾
Upload File	<input type="button" value="Choose File"/> No file chosen
Comments	<div></div>



Upload



Reset

Should a CIDI ticket be submitted to get this resolved?

Regards,

**Asikeh Kanu**

Portfolio Manager, Power Services

Office 619.732.1854 ext.130

[akanu@sdcommunitypower.org](mailto:akanu@sdcommunitypower.org)

PO Box 12716

San Diego, CA 92112

[sdcommunitypower.org](http://sdcommunitypower.org)

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SDCP000004



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-----Original Message-----

From: Mohammed-Ali, Abdulrahman <amohammedali@caiso.com>

Sent: Sunday, July 2, 2023 11:35 AM

To: Richardson, Mark <marichardson@caiso.com>

Cc: Byron Vosburg <BVosburg@sdcommunitypower.org>; RA

<RA@sdcommunitypower.org>; Power Contracts

<PowerContracts@sdcommunitypower.org>; Quintavalla, Ginger

<GQUINTAVALLA@caiso.com>

Subject: Re: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

You're correct Mark, today (7/2) is the last day to submit updates for the August RA showings. You're also correct about requesting submissions past the T-30 deadline under good cause, it's very rare to happen and even rarer that we would grant the request.

So Byron to summarize:

Ideally if you have an existing resource ID mapped to [REDACTED] you can use it today to amend your showings.

Otherwise, you can attempt to submit a CIDI ticket requesting submission past the deadline and we'll take to legal for evaluation. But again this is very unlikely to get approved.

Sorry for not having a better solution at this point.

Regards,  
Abdul

Sent from my iPhone

On Jul 1, 2023, at 8:23 PM, Richardson, Mark <[marichardson@caiso.com](mailto:marichardson@caiso.com)> wrote:

&#257; Thank you for the note sir- Is there any existing res-id that can be used at all? That would be best case. The submission deadline for T30 is 7/2 I believe. The tariff and BPM outlines the possible addition past T30, but in my experience with RA over the past 10 years I haven't seen that happen. I will let Abdul weigh in on that possibility.

Warm regards,  
.. \_

SDCP000005

Mark Richardson

On Jul 1, 2023, at 7:08 PM, Byron Vosburg <[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)> wrote:

&#-257;  
Hi Mark and team,

Thanks for looking into this and reporting back. We really appreciate it.

Is there any potential workaround here? FWIW, we're only planning to import 7 MW at [REDACTED] for Aug (limited by the import rights that we could source on short notice as our other supply transactions fell through), so it feels immaterial in the grand scheme of things, but - as I'm sure you're aware - the CPUC penalties involved with being more than 1% deficient are significant.

Maybe a delay in the final CV until an update can include the new Resource ID on Monday? Or a manual override if the final CV results in a mismatch between our RA and Supply Plans due solely to this one 7 MW resource?

I know we're asking a lot, and we very much appreciate your time and collaboration on this matter, especially if there are any creative solutions to be found.

Thanks again,  
Byron

Byron Vosburg

Mobile 619.880.6545<<tel:+16198806545>>

[bvosburg@sdcommunitypower.org](mailto:bvosburg@sdcommunitypower.org)<<mailto:bvosburg@sdcommunitypower.org>>

---

From: Richardson, Mark <[marichardson@caiso.com](mailto:marichardson@caiso.com)>  
Sent: Saturday, July 1, 2023 5:11:57 PM  
To: Byron Vosburg <[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)>; Mohammed-Ali, Abdulrahman <[amohammedali@caiso.com](mailto:amohammedali@caiso.com)>  
Cc: RA <[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)>; Power Contracts <[PowerContracts@sdcommunitypower.org](mailto:PowerContracts@sdcommunitypower.org)>; Quintavalla, Ginger <[GQUINTAVALLA@caiso.com](mailto:GQUINTAVALLA@caiso.com)>  
Subject: RE: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

Team,

I spoke to the MF team and unfortunately this request cannot be made on our side. We see that the CIDI ticket (264123) came in at 5:37PM on Friday. In-order to process a MF request, the team needs at least 3BD's in advance so that the new resource\_id can be promoted to STAGE as part of the process. Apologies for not being able to accommodate this request.

SDCP000006

accommodate this request.

We will follow up further on Monday.

Thanks,

Mark

From: Byron Vosburg <[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)>  
Sent: Saturday, July 1, 2023 4:55 PM  
To: Mohammed-Ali, Abdulrahman <[amohammedali@caiso.com](mailto:amohammedali@caiso.com)>  
Cc: Richardson, Mark <[marichardson@caiso.com](mailto:marichardson@caiso.com)>; RA  
<[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)>; Power Contracts  
<[PowerContracts@sdcommunitypower.org](mailto:PowerContracts@sdcommunitypower.org)>  
Subject: Re: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

Thanks for confirming, Abdul. We deeply appreciate any efforts you all can make to reach someone this weekend. Please lmk if there's anything at all that we can do to facilitate.

Byron

Byron Vosburg

Mobile 619.880.6545<<tel:+16198806545>>

[bvosburg@sdcommunitypower.org](mailto:bvosburg@sdcommunitypower.org)<<mailto:bvosburg@sdcommunitypower.org>>

---

From: Mohammed-Ali, Abdulrahman  
<[amohammedali@caiso.com](mailto:amohammedali@caiso.com)<<mailto:amohammedali@caiso.com>>>  
Sent: Saturday, July 1, 2023 4:31:11 PM  
To: Byron Vosburg  
<[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)<<mailto:BVosburg@sdcommunitypower.org>>>  
Cc: Richardson, Mark  
<[marichardson@caiso.com](mailto:marichardson@caiso.com)<<mailto:marichardson@caiso.com>>>; RA  
<[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)<<mailto:RA@sdcommunitypower.org>>>; Power  
Contracts

SDCP000007



<BVosburg@sdcommunitypower.org<mailto:BVosburg@sdcommunitypower.org>>  
Cc: Mohammed-Ali, Abdulrahman  
<amohammedali@caiso.com<mailto:amohammedali@caiso.com>>; RA  
<RA@sdcommunitypower.org<mailto:RA@sdcommunitypower.org>>; Power  
Contracts  
<PowerContracts@sdcommunitypower.org<mailto:PowerContracts@sdcommunitypower.org>>  
Subject: Re: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

I will have to see if anyone from MF is available this weekend. To confirm, you have import rights at that location? Please note the resource id, is associated to a supplier. To confirm, you are coordinating with the supplier of this resource?

Warm regards,  
Mark Richardson

On Jun 30, 2023, at 6:00 PM, Byron Vosburg  
<BVosburg@sdcommunitypower.org<mailto:BVosburg@sdcommunitypower.org>>  
wrote:

&#-257;

Abdul and Mark - Thanks in advance for your attention and any assistance you can provide. Fully aware that we're at your mercy as we come to you hat-in-hand at the last minute.

[Thanks so much for the introduction, Carrie! (to BCC)]

Attached are our Resource ID request email and accompanying CIDI request, with context copied below, as well. If there's anything that you can do expedite review and creation of our Import Resource ID at [REDACTED] in time for 7/2 CV for Aug RA, it will reduce our shortfall within the CPUC's 1% bandwidth w/r/t "penalty points."

Feel free to reach out with any questions or if there's anything more that we can do to facilitate.

Many thanks – hope you get a chance to enjoy a long weekend.

Best,  
Byron

-----  
From CIDI ticket:

Hi CAISO team, Apologies for the last-minute request here. Asikeh Kanu at SDCP submitted, via email at 4:44pm PST, a request to create new import Resource IDs for purposes of importing firm energy to meet CAISO and CPUC RA requirements. (We did not anticipate needing these until a couple of deals fell through and our only 11th-hour option is to purchase firm energy.) If at all possible, can you please review and approve these in time for submission of an updated RA Plan and Supply Plan prior to 7/2 deadline and final cross validation for Aug RA submission? If it helps, only the

SDCP000009

██████████

Byron Vosburg

From: Carrie Bentley <[cbentley@gridwell.com](mailto:cbentley@gridwell.com)<<mailto:cbentley@gridwell.com>>>

Hi Abdul and Mark,

I'm hoping you'll see this before heading off for a great holiday weekend. My good friend Byron, cc'ed, is having an RA moment because he wants to be able to put a new import on his RA Plan because his prior import deals fell through, but the Resource ID isn't created yet. Any chance the ID creation can be expedited so he can show it in CIRA in time for 7/2 cross validation?

He can add additional details.

Thanks!!

## Carrie Bentley

SDCP000010

<https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Furldefense.com%2Fv3%2F\_\_http%3A%2F%2Fwww.gridwell.com%2F\_\_%3B!!AKBAne1!SHi9puGDYNZ9mgJaKGiYX15BI349VoFVeOpMLRt1\_nplVEOjqUf9iGknVhggqbOZryREuzlKjquf1cQcVSu-9QM96bE%24&data=05%7C01%7Cakanu%40sdcommunitypower.org%7C27c04e37e9f243db870008db7b2b1913%7C7fb8255de9a5472f8363b7df45616901%7C0%7C0%7C638239197301107665%7CUnknown%7CTWfepbGZsb3d8eyJWljoimc4wLjAwMDAiLCJQljoiv2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=gKiS2fl%2BKx8a1mr73XPYzqxqZ5ZkZy9qhSjlVIha%2BVU%3D&reserved=0>  
<https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Furldefense.com%2Fv3%2F\_\_http%3A%2F%2Fwww.gridwell.com%2F\_\_%3B!!AKBAne1!Wq48kX2hPICZfGP5RuqhbT1Q\_W-X95HDlGx1Yjprnpdv8aJPpbkl\_BpJjVyLHJ0kFvWvMcM-wgmlofQM4ZLFh7HQl8%24&data=05%7C01%7Cakanu%40sdcommunitypower.org%7C27c04e37e9f243db870008db7b2b1913%7C7fb8255de9a5472f8363b7df45616901%7C0%7C0%7C638239197301107665%7CUnknown%7CTWfepbGZsb3d8eyJWljoimc4wLjAwMDAiLCJQljoiv2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=zUH%2BUyaRUJxpU2yNvtbpdhgzgdV%2FG%2BKWwyq8nGeJvY%3D&reserved=0>  
<mime-attachment>  
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## Upload Supply Plan

The plan submission time has elapsed for the selected month

Submittal Type	Month Ahead	▼				
Target Period	August	▼	Month	2023	▼	Year
SCID	SDCP	▼				
Upload File	Choose File	No file chosen				

SDCP000011

Comments



Upload



Reset



SAN DIEGO  
**COMMUNITY  
POWER**

From: Buitrago, Juan JBUITRAGO@caiso.com  
Subject: RE: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID  
Date: July 19, 2023 at 9:45 AM

JB

To: Mohammed-Ali, Abdulrahman amohammedali@caiso.com, Byron Vosburg BVosburg@sdcommunitypower.org, Richardson, Mark marichardson@caiso.com, Asikeh Kanu akanu@sdcommunitypower.org  
Cc: RA RA@sdcommunitypower.org, Power Contracts PowerContracts@sdcommunitypower.org, Quintavalla, Ginger GQUINTAVALLA@caiso.com, Britt Williams bwilliams@sdcommunitypower.org

Thanks all.

Byron, let me know if any of the below works for your team and I'll coordinate the meeting.

Best,  
Juan E. Buitrago  
Account Manager  
Stakeholder Engagement



~~O: 916.351.4448~~ | C: 916.586.6564  
250 Outcropping Way, Folsom, CA 95630

---

**From:** Mohammed-Ali, Abdulrahman <amohammedali@caiso.com>  
**Sent:** Tuesday, July 18, 2023 9:20 PM  
**To:** 'Byron Vosburg' <BVosburg@sdcommunitypower.org>; Richardson, Mark <marichardson@caiso.com>; Asikeh Kanu <akanu@sdcommunitypower.org>  
**Cc:** RA <RA@sdcommunitypower.org>; Power Contracts <PowerContracts@sdcommunitypower.org>; Quintavalla, Ginger <GQUINTAVALLA@caiso.com>; Buitrago, Juan <JBUITRAGO@caiso.com>; Britt Williams <bwilliams@sdcommunitypower.org>  
**Subject:** RE: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

Absolutely! I'm available: Monday 10-3 and 4-5. Tuesday: 1-3 and 4-5. All pacific time.

Thanks,  
Abdul

---

**From:** Byron Vosburg <BVosburg@sdcommunitypower.org>  
**Sent:** Tuesday, July 18, 2023 9:16 PM  
**To:** Mohammed-Ali, Abdulrahman <amohammedali@caiso.com>; Richardson, Mark <marichardson@caiso.com>; Asikeh Kanu <akanu@sdcommunitypower.org>  
**Cc:** RA <RA@sdcommunitypower.org>; Power Contracts <PowerContracts@sdcommunitypower.org>; Quintavalla, Ginger <GQUINTAVALLA@caiso.com>; Buitrago, Juan <JBUITRAGO@caiso.com>; Britt Williams <bwilliams@sdcommunitypower.org>  
**Subject:** RE: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

Thanks, Abdul. Disappointing outcome, but we appreciate the response.

SDCP000013

Can you please send over your availability early next week? I would like to get a little more color once I'm back in the office. Copying Britt to help find time in my schedule.

Best,  
Byron

**Byron Vosburg**

Mobile 619.880.6545

[bvosburg@sdcommunitypower.org](mailto:bvosburg@sdcommunitypower.org)

---

**From:** Mohammed-Ali, Abdulrahman <[amohammedali@caiso.com](mailto:amohammedali@caiso.com)>  
**Sent:** Tuesday, July 18, 2023 9:02 PM  
**To:** Byron Vosburg <[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)>; Richardson, Mark <[marichardson@caiso.com](mailto:marichardson@caiso.com)>; Asikeh Kanu <[akanu@sdcommunitypower.org](mailto:akanu@sdcommunitypower.org)>  
**Cc:** RA <[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)>; Power Contracts <[PowerContracts@sdcommunitypower.org](mailto:PowerContracts@sdcommunitypower.org)>; Quintavalla, Ginger <[GQUINTAVALLA@caiso.com](mailto:GQUINTAVALLA@caiso.com)>; Buitrago, Juan <[JBUITRAGO@caiso.com](mailto:JBUITRAGO@caiso.com)>  
**Subject:** RE: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

Hi Byron,

Thanks again for the thorough explanation!

Unfortunately, after a lot of discussion internally and escalating your request, the conclusion was to deny this late submission under good cause. I giggle as well for the time we all spent on these 7 MW :) but we really wanted to help and I'm sorry we weren't able to this time!

Please feel free to give me a call if you would like to get more details about this.

Thanks,  
Abdul

**Abdulrahman M. Mohammed-Ali**

Operations Engineering

California ISO

(916) 671-9678

---

**From:** Byron Vosburg <[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)>  
**Sent:** Tuesday, July 18, 2023 8:01 AM  
**To:** Mohammed-Ali, Abdulrahman <[amohammedali@caiso.com](mailto:amohammedali@caiso.com)>; Richardson, Mark <[marichardson@caiso.com](mailto:marichardson@caiso.com)>; Asikeh Kanu <[akanu@sdcommunitypower.org](mailto:akanu@sdcommunitypower.org)>  
**Cc:** RA <[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)>; Power Contracts <[PowerContracts@sdcommunitypower.org](mailto:PowerContracts@sdcommunitypower.org)>; Quintavalla, Ginger <[GQUINTAVALLA@caiso.com](mailto:GQUINTAVALLA@caiso.com)>; Buitrago, Juan <[JBUITRAGO@caiso.com](mailto:JBUITRAGO@caiso.com)>  
**Subject:** RE: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

Hi Abdul and team,

SDCP000014

Thanks again for your time on this. Following up here since we haven't heard anything since our call last week.

For purposes of closing the loop via email, as discussed last week, none of the three deals that "fell through" was fully executed. Quick summary of each below.

- A renewable resource – from which SDCP expected to purchase sufficient capacity to close out its Aug MARA needs – had its COD delayed multiple times; once its COD (and associated NQC) extended beyond 7/1, SDCP was no longer able to contract for its RA.
- As the resource above experienced delays, SDCP sourced other opportunities. One was with an in-state power marketer that, despite having sufficient capacity length to reduce SDCP's shortfall to within 1% of its total RAR, was unwilling to transact during the last week of the cure period "because their compliance person was out of the office" and didn't want to risk supply plan mismatches.
- SDCP subsequently sourced import supply from an out-of-state supplier to pair with SDCP import capability, sufficient to fully cure SDCP's deficiency, but the supplier had yet to transact with any CCAs and, despite SDCP's willingness to entertain non-standard payment or collateral terms, was unwilling to spin up its credit team for review during the last week of cure period
  - For context, SDCP also engaged with two other import energy suppliers that claimed to have import supply available but were unable to transact quickly with a new entity – or, for that matter, to entertain a credit sleeve via a third, investment-grade rated party.
- This left SDCP, as you're aware, with only one last-minute opportunity to purchase 7 MW of [REDACTED] import RA and import rights as discussed at length below.

Again, we understand that these requests are rarely granted, and we apologize for spending so much CAISO time on 7 measly MW when we all should be spending time on much larger issues (hopefully the associated giggles at our expense have been worth it? 😊). That said, as short, inefficient, and complex as this market has become, we continue to hope that you all can find such accommodation for a well-intended LSE facing such extenuating circumstances.

Please reach out with any additional questions. I'll be out of the office this Wed-Fri (and out of cell service Thurs/Fri) but would be happy to discuss today, tomorrow (while in transit), or early next week.

Thanks,  
Byron

**Byron Vosburg**

Mobile 619.880.6545

[bvosburg@sdcommunitypower.org](mailto:bvosburg@sdcommunitypower.org)

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**From:** Mohammed-Ali, Abdulrahman <[amohammedali@caiso.com](mailto:amohammedali@caiso.com)>

**Sent:** Wednesday, July 12, 2023 10:24 AM

**To:** Byron Vosburg <[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)>; Richardson, Mark <[marichardson@caiso.com](mailto:marichardson@caiso.com)>; Asikeh Kanu <[akanu@sdcommunitypower.org](mailto:akanu@sdcommunitypower.org)>

**Cc:** RA <[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)>; Power Contracts

SDCP000015

CC: RA <[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)>, Power Contracts  
<[PowerContracts@sdcommunitypower.org](mailto:PowerContracts@sdcommunitypower.org)>; Quintavalla, Ginger  
<[GQUINTAVALLA@caiso.com](mailto:GQUINTAVALLA@caiso.com)>; Buitrago, Juan <[JBUITRAGO@caiso.com](mailto:JBUITRAGO@caiso.com)>  
**Subject:** RE: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

Hi Byron,

We're close to making a decisions on this, but I need one more thing clarified please. When you say "two transactions fell through", does this mean you had contracts in place and the counterparty exercised an opt out provision last minute, or you were negotiating and couldn't close the deal in time for the T-30 deadline? Or is it something else? More information on this would be appreciated.

Thanks,  
Abdul

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**From:** Byron Vosburg <[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)>  
**Sent:** Monday, July 10, 2023 7:40 AM  
**To:** Mohammed-Ali, Abdulrahman <[amohammedali@caiso.com](mailto:amohammedali@caiso.com)>; Richardson, Mark <[marichardson@caiso.com](mailto:marichardson@caiso.com)>; Asikeh Kanu <[akanu@sdcommunitypower.org](mailto:akanu@sdcommunitypower.org)>  
**Cc:** RA <[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)>; Power Contracts <[PowerContracts@sdcommunitypower.org](mailto:PowerContracts@sdcommunitypower.org)>; Quintavalla, Ginger <[GQUINTAVALLA@caiso.com](mailto:GQUINTAVALLA@caiso.com)>; Buitrago, Juan <[JBUITRAGO@caiso.com](mailto:JBUITRAGO@caiso.com)>  
**Subject:** Re: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

Hi Abdul,

Thanks for the update. We appreciate all your time spent on this.

We continue to believe that there should be room for a (one-time) reasonable accommodation here.

Please let me know if there's anything more we can do to facilitate your review.

Thanks again,  
Byron

**Byron Vosburg**  
Mobile [619.880.6545](tel:619.880.6545)  
[bvosburg@sdcommunitypower.org](mailto:bvosburg@sdcommunitypower.org)

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**From:** Mohammed-Ali, Abdulrahman <[amohammedali@caiso.com](mailto:amohammedali@caiso.com)>  
**Sent:** Friday, July 7, 2023 5:07:25 PM  
**To:** Byron Vosburg <[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)>; Richardson, Mark <[marichardson@caiso.com](mailto:marichardson@caiso.com)>; Asikeh Kanu <[akanu@sdcommunitypower.org](mailto:akanu@sdcommunitypower.org)>  
**Cc:** RA <[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)>; Power Contracts <[PowerContracts@sdcommunitypower.org](mailto:PowerContracts@sdcommunitypower.org)>; Quintavalla, Ginger <[GQUINTAVALLA@caiso.com](mailto:GQUINTAVALLA@caiso.com)>; Buitrago, Juan <[JBUITRAGO@caiso.com](mailto:JBUITRAGO@caiso.com)>

**Subject:** RE: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

Hi Byron,

I wanted to give you an update before we head to the weekend. We are still reviewing your request to update your showings after the T-30 deadline. The outcome is not looking favorable, unfortunately, however, we are trying our best to find a way to accommodate your request, and that is what's taking time. I'm hoping to have an answer for you by early next week.

Thanks and have a great weekend!

Abdul

-----Original Message-----

From: Byron Vosburg <[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)>

Sent: Wednesday, July 5, 2023 5:15 PM

To: Richardson, Mark <[marichardson@caiso.com](mailto:marichardson@caiso.com)>; Asikeh Kanu <[akanu@sdcommunitypower.org](mailto:akanu@sdcommunitypower.org)>

Cc: Mohammed-Ali, Abdulrahman <[amohammedali@caiso.com](mailto:amohammedali@caiso.com)>; RA <[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)>; Power Contracts <[PowerContracts@sdcommunitypower.org](mailto:PowerContracts@sdcommunitypower.org)>; Quintavalla, Ginger <[QUINTAVALLA@caiso.com](mailto:QUINTAVALLA@caiso.com)>

Subject: RE: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

Hi CAISO team,

Hope you all enjoyed the holiday. Just to keep you all in the loop, we submitted the comment below to the CIDI ticket regarding this issue.

Thanks again for your assistance. Please let us know if there's anything more that we can do to facilitate.

Byron

Byron Vosburg

Mobile 619.880.6545

[bvosburg@sdcommunitypower.org](mailto:bvosburg@sdcommunitypower.org)

A comment has been added to case #00264137 [Case Thread ref: \_00DA0Hr5P.\_5008Z2DXp6L:ref]

Case Comment Added:

By way of update, per email from CAISO RDT team at 9:46am today, this Resource ID will be available tomorrow, 7/4. SDCP's request for accommodation per Section 40.2.2.4(c) is thus limited to submission of 7 MW of Import/System RA two days (one business day) after the T-30 deadline. Again, we greatly appreciate CAISO's quick attention and collaboration on this matter. Please let us know if there is anything more that we can do to facilitate review.

Best,

Byron

-----Original Message-----

From: Byron Vosburg

Sent: Wednesday, July 5, 2023 5:24 PM

SDCP000017

Sent: Sunday, July 2, 2023 8:24 PM

To: Richardson, Mark <[marichardson@caiso.com](mailto:marichardson@caiso.com)>; Asikeh Kanu <[akanu@sdcommunitypower.org](mailto:akanu@sdcommunitypower.org)>

Cc: Mohammed-Ali, Abdulrahman <[amohammedali@caiso.com](mailto:amohammedali@caiso.com)>; RA <[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)>; Power Contracts <[PowerContracts@sdcommunitypower.org](mailto:PowerContracts@sdcommunitypower.org)>; Quintavalla, Ginger <[GQUINTAVALLA@caiso.com](mailto:GQUINTAVALLA@caiso.com)>

Subject: RE: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

Mark and Abdul,

Thanks again for your attention to this over the weekend. Unfortunately, we won't be able to submit via another SC/Resource ID today. In case you're curious, additional context/explanation below.\*\*\*

In the meantime, we'll proceed as Abdul outlined below with a CIDI ticket requesting relief. I understand that this has not been common historically, but given the significant changes in RA market conditions and regulations over the last few years, I would like to think that there might be a compelling case here, especially for such a small volume of capacity which i) will serve CA load regardless; ii) could be accommodated via relatively minor administrative action and iii) would prevent significant financial implications to a well-intended (albeit, admittedly, last-minute and struggling-in-such-a-short-market) LSE.

Many continued thanks. More to come this week, I'm sure.

Best,  
Byron

\*\*\*As I'm sure you're aware, the "new" CPUC requirements for import RA require that the LSE purchase an energy product and import it ourselves. While it's possible to arrange for a supplier to provide import services on our behalf in conjunction with an import energy purchase, it's not something that we were able to negotiate at the end of last week with the parties who had (limited) supply available after our other in-state and CPUC-compliant import RA transactions fell through. Unfortunately, it's also not a service that we could amend our SC agreement to include on such short notice; but rest assured, we pursued all options. 😊

Byron Vosburg  
Mobile 619.880.6545  
[bvosburg@sdcommunitypower.org](mailto:bvosburg@sdcommunitypower.org)

-----Original Message-----

From: Richardson, Mark <[marichardson@caiso.com](mailto:marichardson@caiso.com)>

Sent: Sunday, July 2, 2023 2:26 PM

To: Asikeh Kanu <[akanu@sdcommunitypower.org](mailto:akanu@sdcommunitypower.org)>

Cc: Mohammed-Ali, Abdulrahman <[amohammedali@caiso.com](mailto:amohammedali@caiso.com)>; Byron Vosburg <[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)>; RA <[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)>; Power Contracts <[PowerContracts@sdcommunitypower.org](mailto:PowerContracts@sdcommunitypower.org)>; Quintavalla, Ginger <[GQUINTAVALLA@caiso.com](mailto:GQUINTAVALLA@caiso.com)>

Subject: Re: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

Can you confirm the Admin tab has the appropriate date on the plan?

SDCP000018

Warm regards,  
Mark Richardson

On Jul 2, 2023, at 1:55 PM, Asikeh Kanu <[akanu@sdcommunitypower.org](mailto:akanu@sdcommunitypower.org)> wrote:

&#-257;

Hello All,

It appears that portal submission is closed in advance of COB 7/2.

<image001.png>

Should a CIDI ticket be submitted to get this resolved?

Regards,

Asikeh Kanu  
Portfolio Manager, Power Services  
Office 619.732.1854 ext.130  
[akanu@sdcommunitypower.org](mailto:akanu@sdcommunitypower.org)<<mailto:svences@sdcommunitypower.org>>  
PO Box 12716  
San Diego, CA 92112  
[https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Furldefense.com%2Fv3%2F\\_\\_http%3A%2F%2Fsdcommunitypower.org\\_\\_%3B!!AKBAneI1!QfGUEHFcrZ6\\_D9KiBDUQKe-2uY-jT6GdHMF6nQmS0zusUAuRjamYZW2SNNMxKU2tl\\_T9ZFdRdYIVmFkp8hpXnhrcd\\_A%24&data=05%7C01%7CBVosburg%40sdcommunitypower.org%7C37e5bdb6bef4c14dbc808db7f475089%7C7fb8255de9a5472f8363b7df45616901%7C0%7C0%7C638243716529301973%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=SF0guv%2FRJjGAu5T%2BhOLwTRJn3WTuGZX7AYNzx6vxPts%3D&reserved=0](https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Furldefense.com%2Fv3%2F__http%3A%2F%2Fsdcommunitypower.org__%3B!!AKBAneI1!QfGUEHFcrZ6_D9KiBDUQKe-2uY-jT6GdHMF6nQmS0zusUAuRjamYZW2SNNMxKU2tl_T9ZFdRdYIVmFkp8hpXnhrcd_A%24&data=05%7C01%7CBVosburg%40sdcommunitypower.org%7C37e5bdb6bef4c14dbc808db7f475089%7C7fb8255de9a5472f8363b7df45616901%7C0%7C0%7C638243716529301973%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=SF0guv%2FRJjGAu5T%2BhOLwTRJn3WTuGZX7AYNzx6vxPts%3D&reserved=0) <[https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Furldefense.com%2Fv3%2F\\_\\_http%3A%2F%2Fwww.sdcommunitypower.org%2F\\_\\_%3B!!AKBAneI1!R3eg4lwsWISy6ZgDclGzpwHbDJK25UsEWppHKCy\\_mT1HMjutpWL1MS97acM4HjgMrG1oZZbATUloEHfTiyQzXHo%24&data=05%7C01%7CBVosburg%40sdcommunitypower.org%7C37e5bdb6bef4c14dbc808db7f475089%7C7fb8255de9a5472f8363b7df45616901%7C0%7C0%7C638243716529301973%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=nO%2BQ98nVOIjc7qC55oS8nvvF%2F6dxL%2FyWlgsWftYTzT4%3D&reserved=0](https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Furldefense.com%2Fv3%2F__http%3A%2F%2Fwww.sdcommunitypower.org%2F__%3B!!AKBAneI1!R3eg4lwsWISy6ZgDclGzpwHbDJK25UsEWppHKCy_mT1HMjutpWL1MS97acM4HjgMrG1oZZbATUloEHfTiyQzXHo%24&data=05%7C01%7CBVosburg%40sdcommunitypower.org%7C37e5bdb6bef4c14dbc808db7f475089%7C7fb8255de9a5472f8363b7df45616901%7C0%7C0%7C638243716529301973%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=nO%2BQ98nVOIjc7qC55oS8nvvF%2F6dxL%2FyWlgsWftYTzT4%3D&reserved=0)>  
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<[https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Furldefense.com%2Fv3%2F\\_https%3A%2F%2Fsdcommunitypower.org%2Fprivacy-policy%2F\\_%3B!!AKBAneI1!R3eg4lwsWISy6ZgDc1GzpwHbDJK25UsEWppHKCy\\_mT1HMjWtPnT-utpWL1MS97acM4HjgMrG1oZZbATUloEHfTpnT-wY%24&data=05%7C01%7CBVosburg%40sdcommunitypower.org%7C37e5bdb6bef4c14dbc808db7f475089%7C7fb8255de9a5472f8363b7df45616901%7C0%7C0%7C638243716529458199%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=728DsL%2BOKBAA6FAAYptMCE368rN0dZhHB54mAVGHqZE%3D&reserved=0](https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Furldefense.com%2Fv3%2F_https%3A%2F%2Fsdcommunitypower.org%2Fprivacy-policy%2F_%3B!!AKBAneI1!R3eg4lwsWISy6ZgDc1GzpwHbDJK25UsEWppHKCy_mT1HMjWtPnT-utpWL1MS97acM4HjgMrG1oZZbATUloEHfTpnT-wY%24&data=05%7C01%7CBVosburg%40sdcommunitypower.org%7C37e5bdb6bef4c14dbc808db7f475089%7C7fb8255de9a5472f8363b7df45616901%7C0%7C0%7C638243716529458199%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=728DsL%2BOKBAA6FAAYptMCE368rN0dZhHB54mAVGHqZE%3D&reserved=0)>

-----Original Message-----

From: Mohammed-Ali, Abdulrahman <[amohammedali@caiso.com](mailto:amohammedali@caiso.com)>

Sent: Sunday, July 2, 2023 11:35 AM

To: Richardson, Mark <[marichardson@caiso.com](mailto:marichardson@caiso.com)>

Cc: Byron Vosburg <[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)>; RA <[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)>; Power Contracts <[PowerContracts@sdcommunitypower.org](mailto:PowerContracts@sdcommunitypower.org)>; Quintavalla, Ginger <[GQUINTAVALLA@caiso.com](mailto:GQUINTAVALLA@caiso.com)>

Subject: Re: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

You're correct Mark, today (7/2) is the last day to submit updates for the August RA showings. You're also correct about requesting submissions past the T-30 deadline under good cause, it's very rare to happen and even rarer that we would grant the request.

So Byron to summarize:

Ideally if you have an existing resource ID mapped to [REDACTED] you can use it today to amend your showings.

Otherwise, you can attempt to submit a CIDI ticket requesting submission past the deadline and

SDCP000021

we'll take to legal for evaluation. But again this is very unlikely to get approved.

Sorry for not having a better solution at this point.

Regards,

Abdul

Sent from my iPhone

On Jul 1, 2023, at 8:23 PM, Richardson, Mark  
<[marichardson@caiso.com](mailto:marichardson@caiso.com)<<mailto:marichardson@caiso.com>>> wrote:

&#-257; Thank you for the note sir- Is there any existing res-id that can be used at all? That would be best case. The submission deadline for T30 is 7/2 I believe. The tariff and BPM outlines the possible addition past T30, but in my experience with RA over the past 10 years I haven't seen that happen. I will let Abdul weigh in on that possibility.

Warm regards,

Mark Richardson

On Jul 1, 2023, at 7:08 PM, Byron Vosburg  
<[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)<<mailto:BVosburg@sdcommunitypower.org>>> wrote:

&#-257;

Hi Mark and team,

Thanks for looking into this and reporting back. We really appreciate it.

Is there any potential workaround here? FWIW, we're only planning to import 7 MW at [REDACTED] for Aug (limited by the import rights that we could source on short notice as our other supply transactions fell through), so it feels immaterial in the grand scheme of things, but - as I'm sure you're aware - the CPUC penalties involved with being more than 1% deficient are significant.

Maybe a delay in the final CV until an update can include the new Resource ID on Monday? Or a manual override if the final CV results in a mismatch between our RA and Supply Plans due solely to this one 7 MW resource?

I know we're asking a lot, and we very much appreciate your time and collaboration on this matter, especially if there are any creative solutions to be found.

Thanks again,

## Byron

Byron Vosburg

Mobile 619.880.6545<<tel:+16198806545>>

[bvosburg@sdcommunitypower.org](mailto:bvosburg@sdcommunitypower.org)<<mailto:bvosburg@sdcommunitypower.org><<mailto:bvosburg@sdcommunitypower.org>%3cmailto:bvosburg@sdcommunitypower.org>>

From: Richardson, Mark <[marichardson@caiso.com](mailto:marichardson@caiso.com)<<mailto:marichardson@caiso.com>>>

Sent: Saturday, July 1, 2023 5:11:57 PM

To: Byron Vosburg  
<[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)<<mailto:BVosburg@sdcommunitypower.org>>>; Mohammed-Ali, Abdulrahman <[amohammedali@caiso.com](mailto:amohammedali@caiso.com)<<mailto:amohammedali@caiso.com>>>

SDCP000023

Cc: RA <[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)<<mailto:RA@sdcommunitypower.org>>>; Power Contracts <[PowerContracts@sdcommunitypower.org](mailto:PowerContracts@sdcommunitypower.org)<<mailto:PowerContracts@sdcommunitypower.org>>>; Quintavalla, Ginger <[GQUINTAVALLA@caiso.com](mailto:GQUINTAVALLA@caiso.com)<<mailto:GQUINTAVALLA@caiso.com>>>

Subject: RE: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

Team,

I spoke to the MF team and unfortunately this request cannot be made on our side. We see that the CIDI ticket (264123) came in at 5:37PM on Friday. In-order to process a MF request, the team needs at least 3BD's in advance so that the new resource\_id can be promoted to STAGE as part of the process. Apologies for not being able to accommodate this request.

We will follow up further on Monday.

Thanks,

Mark

From: Byron Vosburg  
<[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)<<mailto:BVosburg@sdcommunitypower.org>>>

Sent: Saturday, July 1, 2023 4:55 PM

-- .. -

SDCP000024

To: Mohammed-Ali, Abdulrahman

<[amohammedali@caiso.com](mailto:amohammedali@caiso.com)<<mailto:amohammedali@caiso.com>>>

Cc: Richardson, Mark <[marichardson@caiso.com](mailto:marichardson@caiso.com)<<mailto:marichardson@caiso.com>>>; RA

<[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)<<mailto:RA@sdcommunitypower.org>>>; Power Contracts

<[PowerContracts@sdcommunitypower.org](mailto:PowerContracts@sdcommunitypower.org)<<mailto:PowerContracts@sdcommunitypower.org>>>

Subject: Re: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

Thanks for confirming, Abdul. We deeply appreciate any efforts you all can make to reach someone this weekend. Please lmk if there's anything at all that we can do to facilitate.

Byron

Byron Vosburg

Mobile 619.880.6545<<tel:+16198806545>>

[bvosburg@sdcommunitypower.org](mailto:bvosburg@sdcommunitypower.org)<<mailto:bvosburg@sdcommunitypower.org><<mailto:bvosburg@sdcommunitypower.org><<mailto:bvosburg@sdcommunitypower.org>>>>

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From: Mohammed-Ali, Abdulrahman

<[amohammedali@caiso.com](mailto:amohammedali@caiso.com)<<mailto:amohammedali@caiso.com><<mailto:amohammedali@caiso.com>>>

SDCP000025

[amohammedali@caiso.com](mailto:amohammedali@caiso.com)<mailto:amohammedali@caiso.com>>>

Sent: Saturday, July 1, 2023 4:31:11 PM

To: Byron Vosburg

[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)<mailto:BVosburg@sdcommunitypower.org><mailto:BVosburg@sdcommunitypower.org%3cmmailto:BVosburg@sdcommunitypower.org>>>

Cc: Richardson, Mark

[marichardson@caiso.com](mailto:marichardson@caiso.com)<mailto:marichardson@caiso.com><mailto:marichardson@caiso.com%3cmmailto:marichardson@caiso.com>>>; RA

[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)<mailto:RA@sdcommunitypower.org><mailto:RA@sdcommunitypower.org%3cmmailto:RA@sdcommunitypower.org>>>; Power Contracts

[PowerContracts@sdcommunitypower.org](mailto:PowerContracts@sdcommunitypower.org)<mailto:PowerContracts@sdcommunitypower.org><mailto:PowerContracts@sdcommunitypower.org%3cmmailto:PowerContracts@sdcommunitypower.org>>>

Subject: Re: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

Byron,

You got the steps correct. I'm assuming you already know that you need to have import capability on [REDACTED] to be able to import RA on it.

You have until the end of day tomorrow to update your RA plan and supply plan in CIRA which is open and available for resubmission. But like Mark said, the Masterfile team who would create this new ID for you is a M-F work schedule and the challenge is finding someone after hours.

Thanks,

Abdul

Sent from my iPhone

On Jul 1, 2023, at 11:56 AM, Byron Vosburg

[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)<mailto:BVosburg@sdcommunitypower.org><mailto:BVosburg@sdcommunitypower.org>>>

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<[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)<<mailto:BVosburg@sdcommunitypower.org><<mailto:BVosburg@sdcommunitypower.org>%3c<mailto:BVosburg@sdcommunitypower.org>>>>>

Cc: Mohammed-Ali, Abdulrahman

<[amohammedali@caiso.com](mailto:amohammedali@caiso.com)<<mailto:amohammedali@caiso.com><<mailto:amohammedali@caiso.com>%3c<mailto:amohammedali@caiso.com>>>>>; RA

<[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)<<mailto:RA@sdcommunitypower.org><<mailto:RA@sdcommunitypower.org>%3c<mailto:RA@sdcommunitypower.org>>>>>; Power Contracts

<[PowerContracts@sdcommunitypower.org](mailto:PowerContracts@sdcommunitypower.org)<<mailto:PowerContracts@sdcommunitypower.org><<mailto:PowerContracts@sdcommunitypower.org>%3c<mailto:PowerContracts@sdcommunitypower.org>>>>>

Subject: Re: [EXTERNAL] RE: Last minute RA issue - SDCP Import Resource ID

I will have to see if anyone from MF is available this weekend. To confirm, you have import rights at that location? Please note the resource id, is associated to a supplier. To confirm, you are coordinating with the supplier of this resource?

Warm regards,

Mark Richardson

On Jun 30, 2023, at 6:00 PM, Byron Vosburg

<[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)<<mailto:BVosburg@sdcommunitypower.org><<mailto:BVosburg@sdcommunitypower.org>%3c<mailto:BVosburg@sdcommunitypower.org>>>>> wrote:

&#-257;

Abdul and Mark - Thanks in advance for your attention and any assistance you can provide. Fully aware that we're at your mercy as we come to you hat-in-hand at the last minute.

[Thanks so much for the introduction, Carrie! (to BCC)]

Attached are our Resource ID request email and accompanying CIDI request, with context copied below, as well. If there's anything that you can do expedite review and creation of our Import Resource ID at [REDACTED] in time for 7/2 CV for Aug RA, it will reduce our shortfall within the CPUC's 1% bandwidth w/r/t "penalty points."

SDCP000028

Feel free to reach out with any questions or if there's anything more that we can do to facilitate.

Many thanks – hope you get a chance to enjoy a long weekend.

Best,

## Byron

From CIDI ticket:

Hi CAISO team, Apologies for the last-minute request here. Asikeh Kanu at SDCP submitted, via email at 4:44pm PST, a request to create new import Resource IDs for purposes of importing firm energy to meet CAISO and CPUC RA requirements. (We did not anticipate needing these until a couple of deals fell through and our only 11th-hour option is to purchase firm energy.) If at all possible, can you please review and approve these in time for submission of an updated RA Plan and Supply Plan prior to 7/2 deadline and final cross validation for Aug RA submission? If it helps, only the [REDACTED] point is critical for August, so any effort to include at least this one ResID prior to 7/2 would be very much appreciated. Feel free to reach out with any questions or if there is anything else we can provide to facilitate an expedited review.

Byron Vosburg

Managing Director

Mobile 619.880.6545

[bvosburg@sdcommunitypower.org](mailto:bvosburg@sdcommunitypower.org)<<mailto:bvosburg@sdcommunitypower.org><<mailto:bvosburg@sdcommunitypower.org>%3cmmailto:bvosburg@sdcommunitypower.org<<mailto:bvosburg@sdcommunitypower.org>%3cmmailto:bvosburg@sdcommunitypower.org%3cmmailto:bvosburg@sdcommunitypower.org>>>



SDCP000029

From: Carrie Bentley

[cbentley@gridwell.com](mailto:cbentley@gridwell.com)<<mailto:cbentley@gridwell.com><<mailto:cbentley@gridwell.com>%3cmailto:cbentley@gridwell.com>>>

Sent: Friday, June 30, 2023 5:46 PM

To: Mohammed-Ali, Abdulrahman

[amohammedali@caiso.com](mailto:amohammedali@caiso.com)<<mailto:amohammedali@caiso.com><<mailto:amohammedali@caiso.com>%3cmailto:amohammedali@caiso.com>>>; Richardson, Mark  
[marichardson@caiso.com](mailto:marichardson@caiso.com)<<mailto:marichardson@caiso.com><<mailto:marichardson@caiso.com>%3cmailto:marichardson@caiso.com>>>

Cc: Byron Vosburg

[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)<<mailto:BVosburg@sdcommunitypower.org><<mailto:BVosburg@sdcommunitypower.org>%3cmailto:BVosburg@sdcommunitypower.org>>>

Subject: Last minute RA issue

Hi Abdul and Mark,

I'm hoping you'll see this before heading off for a great holiday weekend. My good friend Byron, cc'ed, is having an RA moment because he wants to be able to put a new import on his RA Plan because his prior import deals fell through, but the Resource ID isn't created yet. Any chance the ID creation can be expedited so he can show it in CIRA in time for 7/2 cross validation?

He can add additional details.

Thanks!!

Carrie Bentley

916.217.1571

[https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Furldefense.com%2Fv3%2F\\_\\_http%3A%2F%2Fwww.gridwell.com%2F\\_\\_%3B!!AKBAneI1!QfGUEHFcrZ6\\_D9KiBDUQKe-2uY-jT6GdHMF6nQmS0zusUAuRjamYZW2SNNMxKU2tl\\_T9ZFdRdYIVmFkp8hpXzlUJ\\_tw%24&data=05%7C01%7CBVosburg%40sdcommunitypower.org%7C37e5bdb6bef4c14dbc808db7f475089%7C7fb8255de9a5472f8363b7df45616901%7C0%7C0%7C638243716529458199%7CUnkn...](https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Furldefense.com%2Fv3%2F__http%3A%2F%2Fwww.gridwell.com%2F__%3B!!AKBAneI1!QfGUEHFcrZ6_D9KiBDUQKe-2uY-jT6GdHMF6nQmS0zusUAuRjamYZW2SNNMxKU2tl_T9ZFdRdYIVmFkp8hpXzlUJ_tw%24&data=05%7C01%7CBVosburg%40sdcommunitypower.org%7C37e5bdb6bef4c14dbc808db7f475089%7C7fb8255de9a5472f8363b7df45616901%7C0%7C0%7C638243716529458199%7CUnkn...)

SDCP000030

own%7C1wFpbGZsb3d8eyJWlJoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJB

[<mime-attachment>](https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Furldefense.com%2Fv3%2F__http%3A%2F%2Fwww.gridwell.com%3B!!AKBAneI1!UQHWRpAU58WQU0FFXmtmzNqT824IRNFvQYhe1J5oT7eMipsahfz6RD7jSAPKE6E1gkz0I6RL9AwUY0CVvPrMBIfBgs%24&data=05%7C01%7CBVosburg%40sdcommunitypower.org%7C37e5bdbc6bef4c14dbc808db7f475089%7C7fb8255de9a5472f8363b7df45616901%7C0%7C0%7C638243716529458199%7CUnknown%7CTWFpbGZsb3d8eyJWlJoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBti6lk1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=mvUNxFNVQvkBNmBDBS0babCIUqcjPTL9ir6PvMv6qis%3D&reserved=0>https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Furldefense.com%2Fv3%2F__http%3A%2F%2Fwww.gridwell.com%2F__%3B!!AKBAneI1!SHi9puGDYNZ9mgJaKGiYX15BI349VoFVeOpMLRtl_npIVEQjqUf9iGknVhgqbOZryREuzlKjqulcQcVSu-9QM96bE%24&data=05%7C01%7CBVosburg%40sdcommunitypower.org%7C37e5bdbc6bef4c14dbc808db7f475089%7C7fb8255de9a5472f8363b7df45616901%7C0%7C0%7C638243716529458199%7CUnknown%7CTWFpbGZsb3d8eyJWlJoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBti6lk1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=AA6NISNrp60DXe3ARtUChZExLmsTtMlErUbwe7Ho74I%3D&reserved=0>https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Furldefense.com%2Fv3%2F__http%3A%2F%2Fwww.gridwell.com%2F__%3B!!AKBAneI1!Wq48kX2hPICZfGP5RughbT1Q_W-X95HDl9x1Yjprmpdv8aJPpbkI_BpJjVyLHJ0kFvWvMcM-wgmlofFQM4ZLFh7HQI8%24&data=05%7C01%7CBVosburg%40sdcommunitypower.org%7C37e5bdbc6bef4c14dbc808db7f475089%7C7fb8255de9a5472f8363b7df45616901%7C0%7C0%7C638243716529458199%7CUnknown%7CTWFpbGZsb3d8eyJWlJoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBti6lk1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=2KXhBpHcRHuDCDliugDvCbAq379DHpjwhn1XZzT4Uus%3D&reserved=0>https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Furldefense.com%2Fv3%2F__http%3A%2F%2Fwww.gridwell.com%2F__%3B!!AKBAneI1!R3eg4lswISy6ZgDc1GzpwHbDJK25UsEWppHKCy_mT1HMjutpWL1MS97acM4HjgMrG1oZZbATUloEHfTNqHnLG8%24&data=05%7C01%7CBVosburg%40sdcommunitypower.org%7C37e5bdbc6bef4c14dbc808db7f475089%7C7fb8255de9a5472f8363b7df45616901%7C0%7C0%7C638243716529458199%7CUnknown%7CTWFpbGZsb3d8eyJWlJoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBti6lk1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=T%2FJGbbBeh%2BLLsUQslszCMQboh9cm7eEBhMsd0UBoys2w%3D&reserved=0>></a></p></div><div data-bbox=)

<mime-attachment>

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## Customer Service Community

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Case: 00264137

## Case Information

Review for Price Correction	<input type="checkbox"/>	Metering Inquiry	<input type="checkbox"/>
Case Number	00264137	Status	Closed
Functional Environment	Production	SCID Account Owner	San Diego Community Power (SDCP_MK)
Follow-up Date	7/17/2023	SCID	SDCP

## Description Section

Category	RA / CIRA
Subject	Request for Relief: Aug MARA Submission Timing per 40.2.2.4(c)
Description	<p>Hi CAISO team,</p> <p>SDCP respectfully requests accommodation, per Section 40.2.2.4(c) of the CAISO Tariff, to submit a final month-ahead RA Plan and Supply Plan for Aug 2023 after the T-30 deadline.</p> <p>In brief, SDCP is currently [REDACTED] MW short of its System RA obligation for Aug 2023. SDCP had transactions lined up to close its short position the week before the T-30 deadline, but two transactions for [REDACTED] MW fell through, at which point the only remaining opportunity was to pair 7 MW of firm energy at [REDACTED] with equal volume of import rights at the same point (both sourced on 6/30). While the additional 7 MW does not fully cure SDCP's deficiency, it would bring SDCP within 1% of its total system obligation, a bandwidth beyond which the CPUC implements significant penalties.</p> <p>Unfortunately, since SDCP does not yet have an import Resource ID registered at [REDACTED], we have been unable to submit a revised RA Plan and associated Supply Plan with this capacity prior to the 7/2 deadline. Therefore, SDCP respectfully requests that the CAISO allow SDCP to submit a Supply Plan and a revised RA Plan after the T-30 deadline; we expect that this should take no longer than 3 business days, as we will otherwise be ready to submit as soon as the CAISO Master File team is able to register the new Resource ID and make it available for our submission.</p> <p>We greatly appreciate your consideration of this request. Please let me know if you have any questions or there is anything more that we can provide with respect to this matter.</p> <p>Best,</p> <p>Byron Vosburg Managing Director, SDCP bvosburg@sdcommunitypower.org 619-880-6545</p>
Resolution	<p>Hi Byron,</p> <p>Thank you for your inquiry. After review, this request for late submission has been denied. Our records show that our Operations Engineering Resource Adequacy Manager, Abdulrahman Mohammed-Ali also reached out to you via email regarding this.</p>

## Detailed Information

SDCP000033

Trade Date

Trade Hours

Resource ID

Market

**Submitter Information**

Contact Name	Byron Vosburg	Contact Email	bvosburg@sdcommunitypower.org
Contact Phone	707-478-9767	Email Recipients	bvosburg@sdcommunitypower.org,PowerContracts@sdcommunitypower.org,RA@sdcommunitypower.org,cbentley@gridwell.com

**System Information**

Date/Time Opened 7/2/2023 8:58 PM

Date/Time Closed 8/2/2023 5:15 PM

**Contact Information**

Emergency Primary Contact

☐

Emergency Secondary Contact

☐

Emergency ISO Contact Owner

Phone 707-478-9767

Contact Owner Provision API

Mobile

Name Byron Vosburg

Email bvosburg@sdcommunitypower.org

Account Name San Diego Community Power (SDCP\_MK)

Reports To

Title

CR Emergency ISO Contact

AM Emergency ISO Contact Primary

Client Employee Role

LDAP User

☐

LDAP UID BVOSBURGx17611

Contact Type

**Address Information**

Mailing Address

Other Address

**Additional Information**

Fax

Lead Source

Home Phone

Last Stay-in-Touch Request Date

Other Phone

Last Stay-in-Touch Save Date

SDCP000034

Assistant  
Asst. Phone  
Description

Birthdate  
Department

---

**System Information**

Created By CIDI Webservice, 3/4/2021 12:43 PM  
Custom Links [Google Search](#)  
[Yahoo! Weather](#)

Last Modified By AppConfig User, 9/28/2022 9:00 PM  
[Send Gmail](#)

**From:** Asikeh Kanu akanu@sdcommunitypower.org

**Subject:** Resource ID Request

**Date:** June 30, 2023 at 4:36 PM

**To:** RDT@caiso.com

**Cc:** RA RA@sdcommunitypower.org, Byron Vosburg BVosburg@sdcommunitypower.org, Karlee Mink kmink@sdcommunitypower.org, Sobey, Kyle KSobey@tnsk.com, Keller, Michael MKeller@tnsk.com, Johnson, Lee LJohnson@tnsk.com

AK

Good Afternoon,

Please refer to the attached document that outlines San Diego Community Power's (SDCP) request for new resource IDs.

Regards,

**Asikeh Kanu**

**Portfolio Manager, Power Services**

**Office** 619.732.1854 ext.130

[akanu@sdcommunitypower.org](mailto:akanu@sdcommunitypower.org)

PO Box 12716

San Diego, CA 92112

[sdcommunitypower.org](https://sdcommunitypower.org)

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NewIntertieReso  
urceRequest.xls

270 KB

SDCP000036



**Use this form to request:**

- Emergency assistance
- Existing transmission
- IBAA agreements for
- Marginal loss cost analysis
- Priority Wheel Through
- A PT Wheel resource
- Resource Adequacy
- Stranded load

**See section 3.4 of the**

**Pick Lists & Reference**

**Intertie Resources (to**

**Column Descriptions:**

<b>SCID</b>
<b>TNAME</b>
<b>Resource Type</b>
<b>Energy Type</b>
<b>SC Defined Alpha Numeric Field</b>
<b>Minimum Hourly Block Limit</b>
<b>Hourly Pre-Dispatch</b>
<b>Priority Wheel</b>
<b>MW Quantity</b>

<b>Version</b>
1.0
2.0

## CAISO New Intertie Resource Request Template

st an intertie resource to be registered in the Master File for one of the purposes below:

ce

n contracts

or transmission loss adjustment

djustment

gh -

source request with the MW quantity must be made 45 days prior to the month, or by June 29 for the months of July and August 2021.

/

**BPM for Market Instruments for more information.**

### es Tab:

This tab contains a list of allowable TNAMEs (representing scheduling points) for use when creating the intertie resource ID.

Please Note: ELDORADO230 and MIR2 have more than one scheduling point you must select from in the TNAME column on the "(to Add)" tab - these will not be included in the resource ID. Use the SC-defined field to differentiate between the scheduling points.

### Add) Tab:

Use this tab to provide the components that will make up the intertie resource IDs being requested.

The naming convention for intertie Resource IDs in the Master File is the following:

**SCID\_TNAME\_RES TYPE\_ENERGY TYPE\_SC DEFINED ALPHA NUMERIC FIELD**

Example: SCID\_MEAD5MSCHD\_I\_F\_DEAL12

Registered Scheduling Coordinator Identifier that will be used for the resource id
Derived from existing EIR names with some changes. Each TNAME maps to a scheduling point. Select the TNAME from the drop down list that represents the desired intertie scheduling point.
'I' or 'E', designates whether the Resource ID will be used for Importing or Exporting
Designates specific energy type that will apply to the Resource ID. Choices are Firm (F), Non-Firm (NF), Unit Contingent (UC) and Wheel (WHL)
Up to 6 character Alphanumeric defined by SC to help uniquely identify intertie resource ID.
The maximum number of consecutive hours that an intertie may be designated to be dispatched as a block. A block limit may be submitted in the bid that is equal to or less than the Minimum Hourly Block value registered in the Master File. For example if the Registered Minimum Hourly Block Limit is 8 hours then the quantity specified in the bid for the Block Limit can not exceed 8 hours. Default value is set to 24 in Master File.
(Y = Hourly only, N = either 15-minute or Hourly)
Export resource leg of Wheel Through has scheduling priority. Resource has a contract to serve load in a BAA outside of CAISO BAA.
MW quantity of Wheel Through to receive Scheduling Priority

### Description of change

Original

Changes based on Full Network Model DB59 - implementation date, June 14, 2012:

Removed scheduling point: MOHAVE69

Added new scheduling point: IPPUTAH

TNAME	Resource Type	Energy Type	Minimum Hourly Block
AMARGO	I	F	1
BLYTHE161	E	NF	2
CFEROA		UC	3
CFETIJ		WHL	4
CRAG			5
CTW230			6
DEVERS230			7
ELDORADO230 [maps to NSO_2_N008]			8
ELDORADO230 [maps to MAGNOLIA_2_N008]			9
ELDORADO500			10
GONIPP			11
IPP			12
IPPUTAH			13
IVLY2			14
LAKE			15
LLL115			16
LUGO			17
MALIN500			18
MARKETPLACE			19
MCCULLOUG500			20
MDWP			21
MEAD230			22
MEAD2MSCHD			23
MEAD5MSCHD			24
MERCURY138			
MIR2 [maps to RAMON_2_N001]			
MIR2 [maps to COACHELV_2_N101]			
NML230			
NOB			
NWEST			
OAKDALE			
PARKER230			
RANCHOSECO			
RDM230			
SILVERPEAK55			

STANDIFORD
SYLMAR
TESLA230
TRCYCOTP
TRCYCOTPISO
TRCYPGAE
WESTLYLBNS
WESTLYTSLA
WESTWING500
WILLOWBEACH
MOHAVE500
NORTHGILA69
PVWEST
SUMMIT120

Aggregated scheduling tie point for interties NG41 & NG42

Aggregated scheduling tie point for interties PVERED & HASSYM

Aggregated scheduling tie point for interties SPP1 & SPP2

Scheduling Coordinator ID	TNAME	Resource Type	Energy Type	SC Defined Alpha Numeric Field (6 Character Limit)	Minimum Hourly Block Limit (1-24 hours)	Hourly Pre-Dispatch (Y = Hourly only, N = either 15-minute or Hourly)	Export Resource ID of Wheel Through That Has Scheduling Priority	MW Quantity to receive Scheduling Priority (Required for PT Wheel)	Provide any comments here that will help CAISO understand this request. (optional)
RES_ID Components					MIN_HR_BLK_LIM_FF	HR_PRE_DISP	PT_WHEEL_SCHED	PT_WHEEL_MW	Comment
SC_ID	TNAME	I.E	E.NE.UC.WHL	123456	24	Y or N	Y or N/A	MW	



**ATTACHMENT BV-3**  
**EMAIL CORRESPONDENCE WITH NATHAN CHRISTO**

**From:** Christo, Nathan [nathan.christo@cpuc.ca.gov](mailto:nathan.christo@cpuc.ca.gov)  
**Subject:** RE: [EXTERNAL] RE: SDCP August MA RA Deficiency Notice  
**Date:** March 6, 2024 at 10:01 AM  
**To:** Byron Vosburg [BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)

You don't often get email from [nathan.christo@cpuc.ca.gov](mailto:nathan.christo@cpuc.ca.gov). [Learn why this is important](#)

Yes, can do. Thanks for checking.

Regards,

Nate

---

**From:** Byron Vosburg <[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)>  
**Sent:** Wednesday, March 6, 2024 8:57 AM  
**To:** Christo, Nathan <[nathan.christo@cpuc.ca.gov](mailto:nathan.christo@cpuc.ca.gov)>  
**Subject:** Re: [EXTERNAL] RE: SDCP August MA RA Deficiency Notice

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Nate,

My team prefers to submit this contract and tag data confidentiality via the kiteworks SFTP. If we do so, you'll be able to access it, correct?

Thanks,  
Byron

**Byron Vosburg**  
Mobile [619.880.6545](tel:619.880.6545)  
[bvosburg@sdcommunitypower.org](mailto:bvosburg@sdcommunitypower.org)

---

**From:** Byron Vosburg  
**Sent:** Tuesday, March 5, 2024 5:35:13 PM  
**To:** Christo, Nathan <[nathan.christo@cpuc.ca.gov](mailto:nathan.christo@cpuc.ca.gov)>  
**Subject:** RE: [EXTERNAL] RE: SDCP August MA RA Deficiency Notice

Nate,

Apologies for the delay – a couple questions arose internally regarding confidentiality of docs transmitted via email. Trying to resolve shortly and should be able to get back to you in the next day or two.

Thanks for your patience.

Best,  
Byron

**Byron Vosburg**  
Mobile [619.880.6545](tel:619.880.6545)  
[bvosburg@sdcommunitypower.org](mailto:bvosburg@sdcommunitypower.org)

---

**From:** Byron Vosburg  
**Sent:** Tuesday, February 27, 2024 10:14 AM  
**To:** Christo, Nathan <[nathan.christo@cpuc.ca.gov](mailto:nathan.christo@cpuc.ca.gov)>  
**Subject:** RE: [EXTERNAL] RE: SDCP August MA RA Deficiency Notice

Hi Nate,

Yes, it was available prior to the T-30 deadline – just held up due to the need to create a new CAISO resource ID. I'll huddle with the team to pull tags and send them and the confirm to you by the end of this week, likely in the next day or two.

Thanks,  
Byron

**Byron Vosburg**  
Mobile [619.880.6545](tel:619.880.6545)  
[bvosburg@sdcommunitypower.org](mailto:bvosburg@sdcommunitypower.org)

---

**From:** Christo, Nathan <[nathan.christo@cpuc.ca.gov](mailto:nathan.christo@cpuc.ca.gov)>  
**Sent:** Monday, February 26, 2024 9:48 AM

**Sent:** Monday, February 26, 2024 8:49 AM  
**To:** Byron Vosburg <[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)>  
**Subject:** RE: [EXTERNAL] RE: SDCP August MA RA Deficiency Notice

You don't often get email from [nathan.christo@cpuc.ca.gov](mailto:nathan.christo@cpuc.ca.gov). [Learn why this is important](#)

Byron,

Thank you for the detailed reply. Was the "7 MW of import rights at [REDACTED]" purchased and available prior to ED's June 30, 2023, cured deadline? If so, please provide the "purchase confirmation, e-tag data, and any other information appropriate to demonstrate such eligibility" documentation, or the contract, showing this resources' availability. Again, thanks for response.

Regards,

Nate Christo  
Senior Investigator/Regulatory Analyst  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
[nathan.christo@cpuc.ca.gov](mailto:nathan.christo@cpuc.ca.gov)  
415 703 1069

---

**From:** Byron Vosburg <[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)>  
**Sent:** Tuesday, February 20, 2024 10:29 PM  
**To:** Christo, Nathan <[nathan.christo@cpuc.ca.gov](mailto:nathan.christo@cpuc.ca.gov)>  
**Cc:** RA <[RA@sdcommunitypower.org](mailto:RA@sdcommunitypower.org)>; Compliance <[compliance@sdcommunitypower.org](mailto:compliance@sdcommunitypower.org)>  
**Subject:** [EXTERNAL] RE: SDCP August MA RA Deficiency Notice

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Hi Nate,

Thanks for reaching out. We confirm your calculations, with some additional context.

As outlined below, the [REDACTED] resource was unable to be included in the CAISO Supply Plan; however, consistent with its commitment to meeting RA obligations and supporting state reliability needs, SDCP imported the firm energy associated with this resource into CAISO throughout the month. SDCP respectfully requests that, for purposes of calculation of RA penalties associated with the August 2023 Showing Month, the CPUC consider these 7 MW to have been delivered as RA-eligible. SDCP would be happy to provide its purchase confirmation, e-tag data, and any other information appropriate to demonstrate such eligibility.

- As outlined in your Deficiency Notice email, below, SDCP was [REDACTED] MW short upon its initial filing for Aug 2023 RA compliance.
- At the time, SDCP was in discussions with a number of resource developers and LSEs who had supply coming online in the summer of 2023 and, as you're likely aware, due to significant pandemic- and supply chain-related market disruptions and delays, these resource CODs were coming down to the wire. SDCP had identified enough prospective Aug RA supply from developing resources – the only significant source of summer RA available – to meet all RA obligations and worked diligently with these suppliers to contract for this capacity prior to the Aug showing deadline.
- Due to the resource delays and the 45-day filing requirement, some of these resources were not yet available to be shown as RA as of the initial deadline; understandably, resource owners would not sell the RA until their resources were fully certified to provide it. Throughout the cure period, SDCP worked tirelessly to contract for an additional ~319 MW of Aug 2023 RA supply, and an excess of 50 MW of additional supply was lined up to be contracted. However, those additional resources, which were originally expected to be online well in advance of both Aug 1, 2023 and the 45-day showing deadline associated with Aug 2023 RA, experienced delays that, prevented them from receiving NQCs prior to the 30-day final showing deadline. Two of these project delays were not confirmed until two days prior to the 30-day showing deadline.
- At that point, SDCP pivoted to source import RA to close its remaining open position. SDCP was limited by availability of i) import rights that it already owned or could procure on short order and ii) suppliers who could deliver firm energy at these specific import locations. Despite these limitations, SDCP was able to source 7 MW of import rights at [REDACTED] to align with 7 MW of firm energy supply from a supplier at this import point. Although it didn't fully close the short position, SDCP bought what was available.
- Supplying its own Import RA required a new Resource ID to be created. Despite supportive communication and responsiveness from the CAISO, due to process and timing constraints, an SDCP specific Resource ID for [REDACTED] – which SDCP had not previously created since it didn't have import rights at that location – could not be created in time for the 30-day filing deadline.
- Thus, the Resource ID was created and available on July 4, 2023 – within two business days after the 30-day deadline. SDCP was unable to count these 7 MW in its CAISO Supply Plan, but in good faith, SDCP maintained its firm power imports at this location for the month of Aug 2023.
- Since SDCP actually delivered 7 MW that would have been RA-eligible but for this delay in creating a Resource ID, SDCP requests that the CPUC consider this import supply to be RA-eligible for purposes of RA penalty calculation.

Thank you for your consideration of the above circumstances and please let us know if you have any additional questions.

Best,  
Byron

**Byron Vosburg**  
Mobile 619.880.6545  
[bvosburg@sdcommunitypower.org](mailto:bvosburg@sdcommunitypower.org)

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**From:** Christo, Nathan <[nathan.christo@cpuc.ca.gov](mailto:nathan.christo@cpuc.ca.gov)>  
**Sent:** Friday, February 16, 2024 9:44 AM  
**To:** John Dalessi <[john@pacificea.com](mailto:john@pacificea.com)>; Kirby Dusel <[kirby@pacificea.com](mailto:kirby@pacificea.com)>; Byron Vosburg <[BVosburg@sdcommunitypower.org](mailto:BVosburg@sdcommunitypower.org)>; Trading <[trading@sdcommunitypower.org](mailto:trading@sdcommunitypower.org)>; Karin Burns <[kburns@sdcommunitypower.org](mailto:kburns@sdcommunitypower.org)>; [ra@pacificea.com](mailto:ra@pacificea.com); Asikeh Kanu <[akanu@sdcommunitypower.org](mailto:akanu@sdcommunitypower.org)>  
**Subject:** SDCP August MA RA Deficiency Notice

Some people who received this message don't often get email from [nathan.christo@cpuc.ca.gov](mailto:nathan.christo@cpuc.ca.gov). [Learn why this is important](#)

Greetings,

According to the attached revised deficiency notice e-mail, SDCP was deficient in its August 2023 Month Ahead Resource Adequacy requirements. SDCP was deficient in its August 2023 Month Ahead System RA as summarized in the table below. SDCP was instructed to procure the deficient capacity and refill showing the capacity by June 30, 2023, to come into compliance. Please confirm that SDCP procured the resources listed in the table below and did not acquire any additional capacity before the June 30, 2023 deadline.

Month	Allocation for System RA Requirements	Total System RA Resources Procured	Deficiency in System RA Requirement	Additional System RA Resources Procured in First Filing	Additional System RA Resources Procured in Second Filing	Revised Deficiency in System RA Requirement
August						

Also, please verify where Resource [REDACTED] for 7 MW shown in SDCP's second revised filing dated June 30, 2023 is matched to the July 3, 2023 supply plan.

Please respond to this e-mail by COB February 20, 2024.

Regards,

Nate Christo  
Senior Investigator/Regulatory Analyst  
Consumer Protection and Enforcement Division  
California Public Utilities Commission  
[nathan.christo@cpuc.ca.gov](mailto:nathan.christo@cpuc.ca.gov)  
415 703 1069

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

**DECLARATION OF BYRON VOSBURG SUPPORTING  
CONFIDENTIALITY CLAIM FOR THE PREPARED TESTIMONY AND  
ATTACHMENTS OF BYRON VOSBURG**

In accordance with General Order 66-D and Decision (“D.”) 06-06-066, D. 20-07-005, and D.23-06-029, San Diego Community Power (“SDCP”) submits the following declaration in support of its claim of confidentiality for the below-specific information provided in the *Prepared Direct Testimony of Byron Vosburg on Behalf of San Diego Community Power* and related attachments, submitted in Proceeding No. K.24-05-026.

Byron Vosburg, Chief Commercial Officer of SDCP, states and declares:

1. My name is Byron Vosburg. I am Chief Commercial Officer of SDCP, a California Community Choice Aggregator.
2. I am submitting prepared direct testimony and supporting attachments on behalf of SDCP in connection with Proceeding No. K.24-05-026.
3. Portions of that prepared direct testimony and supporting attachments on behalf of SDCP include market sensitive information regarding SDCP’s market position and compliance obligations, as well as information that the Commission has ordered is confidential. That information is highlighted in gray in the confidential version of my supporting testimony and attachments. The confidential information is contained on Page 11 of my testimony, as well as in Attachments BV-2 and BV-3.
4. This information is treated as market sensitive trade secret information that is not disclosed to other entities or the public. Disclosure would result in loss of market advantage and/or other harm to SDCP and its customers. To the best of my knowledge, this information is not already public.

5. SDCP therefore requests that the gray-highlighted portions of the *Prepared Direct Testimony of Byron Vosburg on Behalf of San Diego Community Power* and supporting attachments be treated as confidential and kept under seal.

6. This request for confidentiality is being made pursuant to the requirements and authority of D.06-06-066, D.20-07-005, D.23-06-029, and General Order 66-D.

7. Specifically, the information regarding SDCP's resource adequacy ("RA") compliance obligations and the nature of any deficiencies is information the Commission deemed confidential in D.23-06-029. In addition, the information SDCP seeks confidential treatment of includes market-sensitive RA information that can be used to identify SDCP's year-ahead and month-ahead positions. The highlighted information also reveals confidential RA bilateral contract information which constitutes confidential information under Section III of the community choice aggregator confidentiality matrix. The public interest in preserving the confidentiality of this information outweighs any minimal public interest in making this information public. Disclosure of the highlighted information would provide market-sensitive information to other RA market participants which could harm SDCP's ability to serve its customers and create distortions in the RA market.

8. SDCP is complying with the limitations on confidentiality established by Commission order. SDCP is providing a public, redacted version of the *Prepared Direct Testimony of Byron Vosburg on Behalf of San Diego Community Power* and supporting attachments.

9. SDCP requests that the Commission contact the following person regarding potential release of this information by the Commission:

Andrew Ball  
Keyes & Fox LLP  
1580 Lincoln Street, Suite 1105  
Denver, CO 80203  
aball@keyesfox.com

I declare under penalty of perjury that the foregoing is true and correct. Made this 10<sup>th</sup> day  
of January, 2025, at San Diego, California.

/s/Byron Vosburg  
Byron Vosburg  
Chief Commercial Officer  
San Diego Community Power