**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
**ADVICE LETTER FILING SUMMARY**  
**ENERGY UTILITY**  
**MUST BE COMPLETED BY LSE (Attach additional pages as needed)**

| Peninsula Clean Energy Authority | Contact Person for questions and approval letters:  
Janis Pepper, CEO |
|-------------------------------|----------------------------------|
| ☑ ELC ☐ GAS ☐ PLC ☐ HEAT ☐ WATER | Phone #: (650) 260-0005  
E-mail: jpepper@peninsulacleanenergy.com |

### EXPLANATION OF UTILITY TYPE

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

Advice Letter (AL) #: PCE-003-E  
Subject of AL: GHG Emission Performance Standard (EPS) filing 2019  
Tier Designation: ☑ 1 ☐ 2 ☐ 3  
Keywords (choose from CPUC listing):  
AL filing type: ☑ Annual ☐ Monthly ☐ Quarterly ☐ One-Time ☐ Other _____________________________  
If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution: D.07-01-039  
Does AL replace a withdrawn or rejected AL? If so, identify the prior AL ____________________________  
Summarize differences between the AL and the prior withdrawn or rejected AL: ____________________  
Resolution Required? ☑ Yes ☐ No  
Requested effective date: March 15, 2019  
No. of tariff sheets: ____________________________  
Estimated system annual revenue effect: (%):  
Estimated system average rate effect (%):  
When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).  
Tariff schedules affected:  
Service affected and changes proposed:  
Pending advice letters that revise the same tariff sheets:  

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:  
CPUC, Energy Division  
Utility Info (including e-mail)  
Attention: Tariff Unit  
505 Van Ness Ave.,  
San Francisco, CA 94102  
compliance@peninsulacleanenergy.com  
EDTariffUnit@cpuc.ca.gov  
Peninsula Clean Energy Authority  
2075 Woodside Road  
Redwood City, CA 94061  

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1 Discuss in AL if more space is needed.
February 15, 2019

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102


Dear Energy Division Tariff Unit:

Enclosed please find Peninsula Clean Energy’s Greenhouse Gas Emission Performance Standard Compliance filing pursuant to Commission Decision 07-01-039. Please direct any questions to me at (650) 260-0100 or by email at jpepper@peninsulacleanenergy.com.

Best Regards,

[Signature]
Janis Pepper
Chief Executive Officer
Peninsula Clean Energy

www.PeninsulaCleanEnergy.com

Enclosures
Compliance Filing for LSEs with Long-Term Financial Commitments

February 15, 2019

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

Re: GHG Environmental Performance Standard (EPS) Compliance Filing 2018

Pursuant to Ordering Paragraph No. 4 of Decision (“D.”) 07-01-039, issued in R. 06-04-009 on January 25, 2007, Peninsula Clean Energy Authority submits this annual Attestation Letter affirming that the financial commitments Peninsula Clean Energy Authority has entered into for generation during the prior calendar year are in compliance with the greenhouse gas ("GHG") emissions performance standard (“EPS”). Specifically, Peninsula Clean Energy Authority is in compliance with the EPS. Documentation supporting that compliance is provided below.

Effective Date:  March 15, 2019

Tier Designation:  Tier 2 Designation

Purpose

This Attestation Letter provides information and documentation required by D.07-01-039 for Load Serving Entities (electrical corporations, electric service providers, and community choice aggregators) with new long-term financial commitments (defined on Page 3 in Attachment 7 of D.07-01-039) entered into in calendar year 2018. This Attestation Letter demonstrates that for calendar year 2018 all financial commitments entered into by Peninsula Clean Energy Authority are compliant with the EPS.

Background

D.07-01-039 requires all Load Serving Entities (“LSEs”) to file annual Attestation Letters, due February 15th of each year, attesting to the Commission that the financial commitments entered into for generation during the prior calendar year are in compliance with the EPS. D.07-01-039 requires LSEs to file Attestation Letters as an advice letter and serve the Attestation Letter on the service list in Rulemaking (“R.”) 06-04-009. This Attestation Letter is filed pursuant to that process.
D.07-01-039 requires LSEs to list long-term financial commitments of five years or longer that they have entered into during the prior year. Note that long-term financial commitments can be compliant if any of the following apply:

1) not in a baseload powerplant;
2) generation using pre-approved renewable resource technology;
3) existing combined-cycle combustion turbine (in operation/or permitted to operate as of 6/30/07) with an increase in rated capacity less than 50 megawatts (MW);
4) net emission rate of each baseload facility underlying a covered procurement does not exceed 1,100 lbs of CO₂ per megawatt hour (MWh);
5) Exemption related to: reliability exemption, extraordinary circumstances or financial harm, and CO₂ sequestration through injection in geological formations.

D.07-01-039 requires all LSEs to disclose the investment amount and type of alteration to retained generation, by generation facility and unit. D.07-01-039 also advises LSEs to present documentation regarding the design and intended use of the powerplant(s) underlying their new long-term financial commitments utilizing the sources of information listed in California Public Utilities Code § 8341(b)(4), as well as any other sources of documentation that they believe will be relevant to this determination.

D.07-01-039 emphasizes that the key concept is to establish the design and intended use of the powerplant. Accordingly, documentation of the annualized plant capacity factor for the powerplant should include historical annual averages in order to help determine whether the plant is “designed and intended” to be used for baseload generation. D.07-01-039 requires LSEs to provide documentation of capacity factors, heat rates and corresponding emissions rates that reflect the actual, expected operations of the plant.

This Attestation Letter comports with the requirements outlined above.

**Protests**

This compliance filing is not subject to protest pursuant to General Order 96-B, Energy Industry Rule 9.

**Correspondence**

Any correspondence regarding this compliance filing should be sent by email to the attention of:

Siobhan Doherty  
Director of Power Resources  
Peninsula Clean Energy  
2075 Woodside Road  
Redwood City, CA 94061  
(650) 817-7076  
sdoherty@peninsulacleanenergy.com
Compliance Documentation

The following listings and/or tables provide detailed and specific information regarding Peninsula Clean Energy Authority contracts and long-term financial commitments that are subject to the EPS requirements. The compliance documentation must match the compliance category outlined previously. For example, the information provided must demonstrate that the net emissions rate of each baseload facility underlying a covered procurement is no higher than 1,100 lbs of carbon dioxide (CO2) per megawatt hour (MWh).

1. Include a complete and detailed listing of the new long-term financial commitments of five years or longer they have entered into during the prior year with documentation to demonstrate:
   a) Documentation demonstrating that such procurements are EPS compliant, including any contracts with a term of five years or longer that include provisions for substitute energy purchases.
   b) For any requested reliability-based exemptions that have been pre-approved by the Commission, reference to the application and Commission decision number.

2. The complete listing of new long-term financial commitments of five years or longer must include “linked” contracts whose combined term is five years or longer.

3. Disclosure of LSE investments in retained generation, including “deemed-compliant” combined cycle gas turbines (CCGTs). All LSEs are to disclose the investment amount and a breakdown of alterations or refurbishments to retained generation, by generation facility and unit.

4. Present documentation regarding the designed and intended use of the powerplant(s) underlying their new long-term financial commitments utilizing the sources of information listed in § 8341 (b)(4), as well as any other sources of documentation relevant to the determination.

5. Provide documentation of capacity factors (for definition of capacity factor see Section 5.6 of D.07-01-039.), heat rates and corresponding emissions rates that reflect the actual, expected operation of the plant (not full load heat rate). Documentation of the annualized plant capacity factor for the power plant should include historical annual averages in order to determine whether the plant is “designed and intended” to be used for baseload generation at an annualized plant capacity factor of at least 60 percent.

As detailed in the following table, PCE entered into four long-term financial commitments for generation resources during calendar year 2018. Each of these commitments is detailed in the following table. All four commitments are fully EPS compliant, as all four commitments are for non-baseload resources. In addition, all four commitments are for low or zero GHG emitting hydroelectric resources, and as such fall well below the GHG threshold established in D.07-01-039 and CA Public Utilities Code§ 8341 (b)(4).
### Table – EPS Compliant Contracts

<table>
<thead>
<tr>
<th>Contract</th>
<th>Execution Date</th>
<th>Renewable Resource</th>
<th>Compliance Category</th>
<th>Term Length</th>
<th>EPS Compliant?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bidwell Ditch</td>
<td>1/26/2018</td>
<td>Small Hydro</td>
<td>Not Baseload</td>
<td>17 years</td>
<td>Yes</td>
</tr>
<tr>
<td>Roaring Creek</td>
<td>1/26/2018</td>
<td>Small Hydro</td>
<td>Not Baseload</td>
<td>17 years</td>
<td>Yes</td>
</tr>
<tr>
<td>Clover Creek</td>
<td>1/26/2018</td>
<td>Small Hydro</td>
<td>Not Baseload</td>
<td>15 years</td>
<td>Yes</td>
</tr>
<tr>
<td>Hatchet Creek</td>
<td>1/26/2018</td>
<td>Small Hydro</td>
<td>Not Baseload</td>
<td>20 years</td>
<td>Yes</td>
</tr>
</tbody>
</table>

### Certification

1. I have reviewed, or have caused to be reviewed, this compliance submittal.

2. Based on my knowledge, information, or belief, this compliance submittal does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements true.

3. Based on my knowledge, information, or belief, this compliance submittal contains all of the information required to be provided by Commission orders, rules, and regulations.

Include the name and contact information for the LSE officer(s) certifying the above:

Dated: February 15, 2019

Jan Pepper  
Chief Executive Officer  
Peninsula Clean Energy  
2075 Woodside Road  
Redwood City, CA 94061  
(650) 260-0100  
jpepper@peninsulacleanenergy.com