



July 12, 2023

California Public Utilities Commission
Energy Division
Attention: Integrated Resources Planning
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102-3298

Advice Letter Peninsula Clean Energy Authority 031-E

RE: REQUESTED BASELINE SWAP UNDER D.23-02-040 ADVICE LETTER

EFFECTIVE DATE

Peninsula Clean Energy Authority (“Peninsula Clean Energy”) requests that this Tier 2 Advice Letter become effective on August 11, 2023, which is 30 days after the date of this filing.

TIER DESIGNATION: Tier 2 Designation

PURPOSE

D.23-02-040 defines the Mid-Term Reliability (“MTR”) procurement requirements for load serving entities (“LSEs”) between 2023 and 2028. D.23-02-040 also establishes a process for LSEs to request that resources be removed from the baseline generator list, and an equivalent amount of September Net Qualifying Capacity (“NQC”) added to their 2025 Tranche 3 procurement requirements.

Peninsula Clean Energy submits this Tier 2 Advice Letter to request that two of its new solar resources be removed from the baseline, and a corresponding amount of NQC be added to Peninsula Clean Energy’s 2025 Tranche 3 procurement requirements.

BACKGROUND

The commission issued D.21-06-035 on June 30, 2021, and established the MTR procurement requirements for LSEs to procure resources to be online by August 1 2023, June 1 2024, June 1 2025, and June 1 2026.

In D.23-02-040 the Commission further adopted procurement targets for June 1 2027 and June 1 2028, and allowed extension of certain long lead time resources that were previously required to be online by June 1 2026 to be online by June 1 2028, if LSEs procure 2027 and 2028 resources by 2026 instead. D.23-02-040 also established a baseline swap process that allows LSEs to remove certain resources from the baseline generator list (if they are new resources that come

online after 1/1/2020), and thus qualify those resources as MTR-compliant. A corresponding amount of NQC will be added to the LSE’s 2025 Tranche 3 procurement requirement to ensure that the total incremental capacity added to the system matches the planning performed by the California Public Utilities Commissions (CPUC).

The CPUC published the baseline generator list on its IRP Procurement Track website.¹ Resources listed on the baseline generator list may not be counted towards an LSE’s MTR procurement.

The CPUC issued the January 2023 Update of the “Incremental ELCC Study for Mid-Term Reliability Procurement”² specifying the Effective Load Carrying Capacity (ELCC) factors to be used for MTR compliance, and confirmed those ELCCs in a June 30, 2023 email to the R.20-05-003 Service List.

Peninsula Clean Energy has procured two resources that came online after 1/1/2020. The first resource is Wright Solar Freeman, a 200 MW solar facility located near Los Banos, CA in Merced County, that came online 1/3/2020. The second resource is Mustang 2 Whirlaway Solar, a 100 MW solar facility located near Lemoore, CA in Kings County, that came online 11/11/2020. Both of these resources are currently listed on the baseline generator list, and thus do not count as incremental resources under the MTR orders.

Peninsula Clean Energy has worked diligently to procure resources to meet its MTR requirements, and is currently meeting all of its MTR requirements except 2023 Tranche 1 requirements. Peninsula Clean Energy is short 21.1 MW of its total 38 MW requirement for 2023 Tranche 1.

BASELINE SWAP REQUEST

Peninsula Clean Energy requests that Energy Division remove Wright Solar Freeman and Mustang 2 Whirlaway Solar from the Baseline, allowing Peninsula Clean Energy to count these resources towards its 2023 Tranche 1 procurement requirements under the MTR order. Peninsula Clean Energy correspondingly requests that Energy Division add 23.4 MW of NQC to Peninsula Clean Energy’s 2025 Tranche 3 procurement requirement.

Resource	SERVM ID	Nameplate Capacity (MW)	ELCC	NQC (MW)
Wright Solar Freeman	WRGTSR 2 WSFSR1	200	7.8%	15.6
Mustang 2 Whirlaway Solar	CABALO 2 M2WSR2	100	7.8%	7.8
Total		300	--	23.4

¹ <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/long-term-procurement-planning/more-information-on-authorizing-procurement/irp-procurement-track>

² https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/20230210_irp_e3_astrape_updated_incremental_elcc_study.pdf

NOTICE

Anyone wishing to protest this advice filing may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice filing. Protests should be mailed to:

CPUC, Energy Division
Attention: Integrated Resources Planning
505 Van Ness Avenue
San Francisco, California 94102
E-mail: edtariffunit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Jeremy Waen
Director of Regulatory Policy
Peninsula Clean Energy
2075 Woodside Road
Redwood City, CA 94061
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There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

Peninsula Clean Energy is serving copies of this advice filing to the relevant parties shown on the R.20-05-003 service lists. For changes to these service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

CORRESPONDENCE

For questions, please contact Jeremy Waen at (650) 257-8026 or by electronic mail at jwaen@peninsulacleanenergy.com.

/s/ Jeremy Waen

Jeremy Waen
Director of Regulatory Affairs
Peninsula Clean Energy Authority

cc: R.20-05-003 Service List