



**Theodore Bardacke**  
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June 14, 2019

California Public Utilities Commission  
Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, CA 94102  
Email: EDTariffUnit@cpuc.ca.gov

ADVICE LETTER 0002-E

**SUBJECT: Clean Power Alliance of Southern California’s Submission of Estimates of Emissions of Nitrogen Oxides and Particulate Matter Associated with All Emitting Resources Used to Serve Load, Including System Power as Ordered by California Public Utilities Commission Decision 19-04-040**

**I. INTRODUCTION**

Pursuant to California Public Utilities Commission (“Commission”) Decision (“D.”) 19-04-040 Ordering Paragraph (“OP”) 6, Clean Power Alliance of Southern California (“CPA”) submits this Advice Letter seeking Commission approval of its Estimates of Emissions of Nitrogen Oxides and Particulate Matter Associated with All Emitting Resources Used to Serve Load, Including System Power.

**II. BACKGROUND AND PURPOSE**

On May 1, 2019, the Commission issued D.19-04-040 Adopting Preferred System Portfolio And Plan For 2017-2018 Integrated Resource Plan Cycle in the Order Instituting Rulemaking (“OIR”) to Develop an Electricity Integrated Resource Planning Framework and to Coordinate and Refine Long-Term Procurement Planning Requirements proceeding, Rulemaking (“R.”) 16-02-007. This decision required CPA to file supplemental numerical information about criteria pollutant information through a Tier 2 Advice Letter.

**III. CPA RESPONSE**

In response to guidance in D.19-04-040, CPA hereby submits its supplemental information. This AL contains an analysis of emissions and particulate matter associated with all emitting resources used to serve load for the Conforming Portfolio. To conduct the analysis, CPA used its Clean Net Short totals to determine the forecasted dependence on dispatchable gas-fired power in the study years. Next, CPA used the RESOLVE model energy balance results to determine CPA’s share of CAISO gas-fired generation. Emissions intensities and average heat rate assumptions derived from the

RESOLVE model were used to determine CPA's contribution to NOx and PM2.5, provided in Table 1 below:

***Table 1: Estimates of NOx and PM2.5 from gas generation in Conforming Portfolio***

	<b>2018</b>	<b>2022</b>	<b>2026</b>	<b>2030</b>
CPA's Forecasted Dependence on Dispatchable Gas-Fired Power (GWh)	743	5333	4920	2463
Forecasted Contribution to NOx (tons)	26	192	174	86
Forecasted Contribution to PM2.5 (tons)	17	126	115	58
Effective Emissions Rate of NOx (t/GWh)	0.035	0.036	0.035	0.035
Effective Emissions Rate of PM2.5 (t/GWh)	0.023	0.169	0.155	0.078

#### **IV. REQUEST FOR COMMISSION APPROVAL**

CPA requests that the Commission certify or approve CPA's IRP pursuant to D.19-04-040 and D.18-02-018;

#### **V. TIER DESIGNATION**

Pursuant to D.19-04-040 OP 6, CPA submits this Advice Letter with a Tier 2 designation.

#### **VI. EFFECTIVE DATE**

This Advice Letter will become effective no later than July 15, 2019, the 30th calendar day after the date submitted.

#### **VII. NOTICE**

Anyone wishing to protest this Advice Letter may do so by letter via U.S. Mail, facsimile, or by email, any of which must be received by the Energy Division and SCE no later than July 5, 2019, which is 20 days after the date of this Advice Letter (General Order 96-B, Section 7.4). Protests should be mailed to the following recipients:

CPUC, Energy Division  
Attention: Tariff Unit  
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 as above). Additionally, protests and all other correspondence regarding this Advice Letter should also be sent by letter or electronically to the attention of:

Ted Tardif  
Energy Resources Manager, Clean Power Alliance of Southern California  
555 W. 5<sup>th</sup> Street, Floor 35  
Los Angeles, California 90013  
E-mail: ttardif@cleanpoweralliance.org

Nancy Whang  
General Counsel, Clean Power Alliance of Southern California  
555 W. 5<sup>th</sup> Street, Floor 35  
Los Angeles, California 90013  
E-mail: [nwhang@cleanpoweralliance.org](mailto:nwhang@cleanpoweralliance.org)

CPA is furnishing copies of this Advice Letter to the interested parties shown on the R.16-02-007 service list. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov). All questions concerning this Advice Letter should be directed to Ted Tardif at (213) 440-0908 or by electronic mail at [ttardif@cleanpoweralliance.org@sce.com](mailto:ttardif@cleanpoweralliance.org@sce.com).



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cc: Service List R.16-02-007



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Clean Power Alliance of Southern California

Utility type:

☒ ELC ☐ GAS ☐ WATER  
☐ PLC ☐ HEAT

Contact Person: Ted Tardif

Phone #: (213) 440-0908

E-mail: ttardif@cleanpoweralliance.org

E-mail Disposition Notice to: ttardif@cleanpoweralliance.org

### EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

June 14, 2019

Advice Letter (AL) #: 0002-E

Tier Designation: 2

Subject of AL: Clean Power Alliance of Southern California's Submission of Estimates of Emissions of Nitrogen Oxides and Particulate Matter Associated with All Emitting Resources Used to Serve Load, Including System Power as Ordered by Decision 19-04-040.

Keywords (choose from CPUC listing):

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.19-04-040

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:

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? ☐ Yes ☒ No

Requested effective date: 7/15/19

No. of tariff sheets: 0

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: None.

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets: None.

<sup>1</sup>Discuss in AL if more space is needed.

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name: Ted Tardif  
Title: Energy Resources Manager  
Utility Name: Clean Power Alliance of Southern California  
Address: 555 W. 5th St., Floor 35  
City: Los Angeles  
State: California Zip: 90013  
Telephone (xxx) xxx-xxxx: (213) 440-0908  
Facsimile (xxx) xxx-xxxx:  
Email: [ttardif@cleanpoweralliance.org](mailto:ttardif@cleanpoweralliance.org)

Name: Nancy Whang  
Title: General Counsel  
Utility Name: Clean Power Alliance of Southern California  
Address: 555 W. 5th St., Floor 35  
City: Los Angeles  
State: California Zip: 90013  
Telephone (xxx) xxx-xxxx: (213) 595-7818  
Facsimile (xxx) xxx-xxxx:  
Email: [nwhang@cleanpoweralliance.org](mailto:nwhang@cleanpoweralliance.org)

## ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtailable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	