



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

☐ ELC      ☐ GAS      ☐ WATER  
☐ PLC      ☐ HEAT

Contact Person:

Phone #:

E-mail:

E-mail Disposition Notice to:

### EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

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 #:

Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: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:

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<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<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:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

## 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	



August 28, 2023

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

**Advice Letter CPA 0023-E**

**SUBJECT: Clean Power Alliance Request to Swap Baseline Resources Under D. 23-02-040**

**PURPOSE**

Clean Power Alliance of Southern California ("CPA") respectfully submits this advice letter ("Advice Letter") to request that one of its storage resources be partially removed from the baseline. An equivalent amount of Net Qualifying Capacity ("NQC") will be added to CPA's 2025 Tranche 3 Mid-Term Reliability ("MTR") requirements upon this Advice Letter's disposition.

**BACKGROUND**

The California Public Utilities Commission ("Commission") issued several procurement orders between 2019 and 2023. On November 7, 2019, the Commission issued Decision ("D.") 19-11-016, and established procurement requirements between 2021 and 2023,<sup>1</sup> requiring load serving entities ("LSEs") to procure resources incremental to a list of baseline resources.<sup>2</sup> On June 30, 2021, the Commission issued D. 21-06-035 and established MTR requirements for load serving entities ("LSEs") to procure resources to achieve commercial operation by August 1, 2023, June 1, 2024, June 1, 2025, and June 1, 2026.<sup>3</sup> The Commission also published a baseline resource list, updated to include resources procured pursuant to D. 19-11-016, on its Integrated Resource Plan ("IRP") Procurement Track website and, similarly, LSEs are unable to count resources included on the list toward their MTR procurement requirements.<sup>4</sup>

Subsequently, the Commission issued D. 23-02-040, which established further procurement requirements in 2026 and 2027,<sup>5</sup> and a baseline resource swap process that allows LSEs to remove

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<sup>1</sup> D.19-11-016, pages 80-81.

<sup>2</sup> D.19-11-016, page 75.

<sup>3</sup> D.21-06-035, pages 56-58.

<sup>4</sup> See Commission's IRP Procurement Track webpage for D.21-06-035 baseline resource list: <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>.

<sup>5</sup> D.23-02-040, pages 31-32.

resources from the baseline resource list to meet their MTR procurement requirements, so long as those resources achieved commercial operation after January 1, 2020.<sup>6</sup> Consequently, a corresponding amount of NQC will be added to the LSE's 2025 Tranche 3 procurement requirement.

CPA has procured several resources in excess of its D. 19-11-016 requirements, including Edward Sanborn Storage ("Sanborn Storage"), which was included in the D. 21-06-035 baseline resource list and achieved commercial operations after January 1, 2020. Sanborn Storage is a 100 MW four-hour stand-alone storage resource located in Kern County and achieved commercial operation in 2021. Because it is listed in the baseline resource list, it currently may not be counted toward CPA's MTR requirements.

As demonstrated in its August 1, 2023, MTR procurement compliance filing, CPA has amended existing Power Purchase Agreements ("PPAs") and executed new PPAs to meet its MTR requirements.<sup>7</sup> However, CPA is still short 67.7 MW of its total 354 MW requirement for its 2024 Tranche 2 requirement. Therefore, CPA requests to remove 67.7 MW of Sanborn Storage from the baseline resource list to count toward its 2024 Tranche 2 requirement. CPA's 2025 Tranche 3 requirement would accordingly be increased by 67.7 MW.

### **BASELINE SWAP REQUEST**

Pursuant to the guidance document provided by Energy Division on August 11, 2023, CPA provides a list of resources that were used to meet its D. 19-11-016 requirements below. CPA's cumulative procurement requirement pursuant to D. 19-11-016 is 196.9 MW, and as Table 1 below demonstrates, CPA procured an excess of 19.88 MW.

**Table 1: D. 19-11-016 Resource List**

Project Name	Project CAISO Resource ID	Project CAISO Queue/WDAT #	D.19-11-016 NQC MW	Contracted Nameplate MW	Contract Status	COD
Voyager Wind II	VOYAGR_2_VOYWD4	119	3.2	21.6	Online	12/28/2018
White Hills	WHITEH_2_MEADDYN2	wind_import_existing, WAPA IA 18-DSR-12816	39.38	300	Online	12/15/2020
High Desert Solar + Storage	HIGHDS_2_H5SSR1, HIGHDS_2_H5SBT1	1414	60.2	100 MW solar/50 MW storage	Online	12/08/2021
Arlington Solar	ARLNTN_2_AR1SR1	1196	14	100	Online	03/21/2022
Luna Storage	BIGSKY_2_ASGBT2	1208	100	100	Online	07/30/2022
<b>Total</b>			216.78			

<sup>6</sup> D. 23-02-040, at pages 86-87.

<sup>7</sup> Clean Power Alliance of Southern California's August 2023 Integrated Resource Plan Procurement Data Update, Appendix B.

CPA requests that Energy Division remove a portion of Sanborn Storage (see project details in Table 2 below) from the baseline resource list and add 67.7 NQC MW to CPA’s 2025 Tranche 3 procurement requirement. Sanborn Storage was previously reported as fulfilling CPA’s D. 19-11-016 requirements that is now excess and intended for MTR.

**Table 2: Sanborn Storage Project Information**

SERVM ID	Project Name	Project CAISO Resource ID	Project CAISO Queue/WDA T #	D.19-11-016 NQC	Contract Nameplate MW	Contract Status	COD
EDWARDSSTORAGE1	Sanborn Storage	SANBRN_2_ESBBT1	1424	67.7 MW (100 MW full capacity)	100 MW	Online	11/01/2021

D. 23-02-040 stipulates several conditions and requirements that allow the removal of proposed resources from the baseline of which two are applicable to CPA with respect to this request. First, the resources that LSEs propose to remove from the baseline has to have come online after January 1, 2020. Sanborn Storage achieved commercial operations after January 1, 2020, as shown in the table above. Second, the removal of a resource from the baseline should not result in the LSE becoming non-compliant with its D. 19-11-016 obligations. CPA has fully met its D. 19-11-016 requirements by procuring excess resources, and partial removal of Sanborn Storage will not result in CPA’s deficiency in complying with D. 19-11-016. For the reasons listed above, CPA would like to remove a portion of Sanborn Storage from the baseline resource list, as detailed in Table 3 below. The removed portion would then be used to help meet CPA’s 2024 MTR obligation of 354 MW.

**Table 3: Baseline Swap Request**

SERVM ID	Generator Name in Resource Baseline List	Project CAISO ID	Project CAISO Queue/WDAT #	Project’s Original Baseline	Contract Status	Online Date Listed in Baseline Generator List	Currently Expected COD	Proposed Swap Capacity (NQC)	Tranche Year	Proposed Swap Capacity
EDWARDSSSTORAGE1	EDWARDSSSTORAGE1	SANBRN_2_ESBBT1	1424	D.21-06-035	Online	08/21/2021	11/01/2021	67.7	2024	74.64

The additional 67.7 NQC MW added to CPA’s 2025 tranche will be met by the excess capacity of Rexford Solar Farm (see project details in Table 4 below), a solar + storage facility that CPA had planned to use to meet its original 2025 obligations of 89 MW. CPA’s new 2025 obligation upon Energy Division’s disposition of this advice letter would be 156.7 MW.

**Table 4: Resource to Fulfill Additional 2025 Obligation**

Project Name	Project CAISO ID	Project CAISO Queue/WDAT #	Contract Status	Currently expected COD	Contracted COD	Contracted NQC
Rexford Solar Farm	Not yet available	1516	Pre-construction	12/31/2024	12/31/2024	176.6

### **TIER DESIGNATION**

Pursuant to D. 23-02-040, this Advice Letter is submitted with a Tier 2 designation.

### **EFFECTIVE DATE**

CPA requests that this Advice Letter become effective on September 27, 2023, 30 days after the date of this filing.

### **NOTICE**

Anyone wishing to protest this Advice Letter may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received by the Energy Division and CPA no later than 20 days after the date of this Advice Letter. Protests should be submitted 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)

In addition, protests and all other correspondence regarding this Advice Letter should be sent by letter or transmitted electronically to the attention of:

C.C. Song  
Senior Director, Regulatory Affairs  
Clean Power Alliance of Southern California  
801 S. Grand Ave., Suite 400  
Los Angeles, CA 90017  
Email: [csong@cleanpoweralliance.org](mailto:csong@cleanpoweralliance.org)

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.

CPA is serving copies of this Advice Letter 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](mailto:Process_Office@cpuc.ca.gov).