



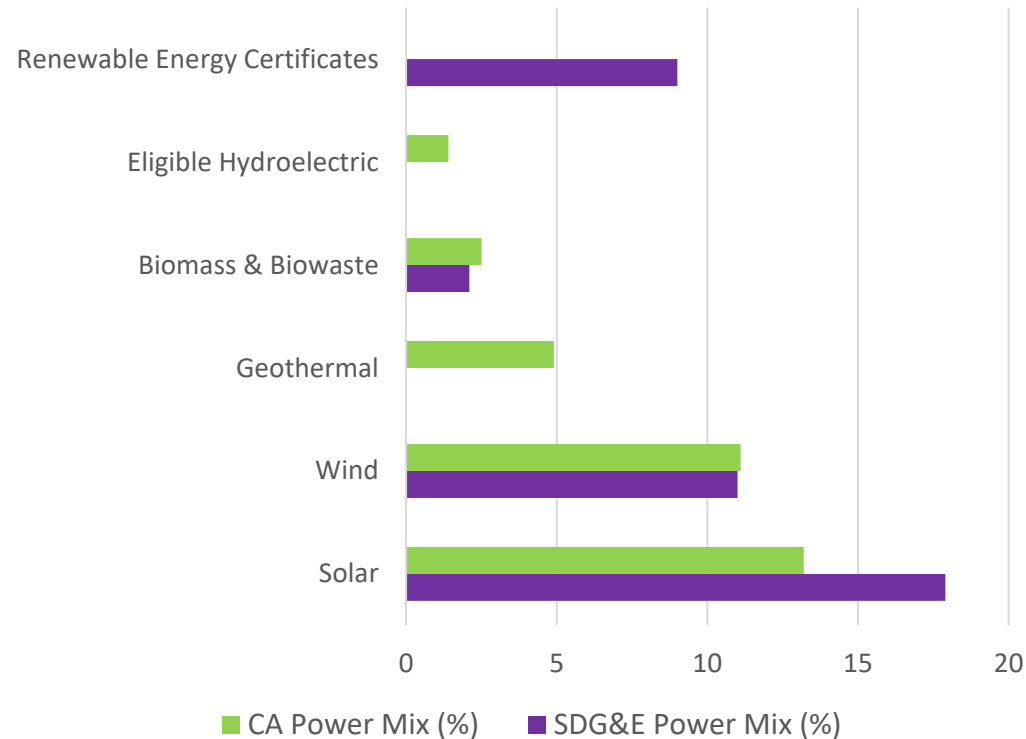
The Protect Our Communities
FOUNDATION

SDCP RENEWABLE PORTFOLIO STANDARD CONTRACTS

**SDCP Has No Regulatory Need for Additional Long-Term
RPS Contracts through 2030**



SDG&E vs. CA Renewables (% of total generation)



RPS Basics

- Senate Bill 100 signed (2018) and requires:
 - 60% RPS generation by 2030
 - 65% of RPS to be long-term contracts (≥ 10 years)
- RPS qualifying Renewables:
 - Solar
 - Wind
 - Geothermal
 - Small Hydroelectric (<30 MW)
 - Biomass and Biowaste

SDG&E's contracts cover all RPS needs through 2030

“As explained throughout this Plan, SDG&E has no need for additional near-term or long-term procurement to satisfy requirements of the RPS program. SDG&E's conforming portfolios in the IRP will align with this fact and show no need for RPS through 2030.”

~SDG&E Draft 2020 Renewables Portfolio Standard Procurement Plan

SDG&E's contracts exceed RPS compliance by two years' worth of generated energy

- SDG&E's September 13, 2021 RPS Compliance Filing completed multiple calculations estimating RPS procurement need using various assumptions.
- In the worst case scenario (lowest SDG&E RPS procurement) SDG&E would complete the 2030 compliance year with enough banked RPS credits for two additional years of RPS compliance.
- According to SDG&E's calculations, it has procured at least 11,595,072 MWh of RPS qualifying energy **above** the requirements needed by 2030 to meet SB 100's clean energy mandate.



CPUC credits SDCP for SDG&E-signed RPS contracts:

- San Diego Community Power (SDCP) pays SDG&E an exit fee (PCIA) for electricity contracts that SDG&E purchased on behalf of all customers before SDCP formed.
- SDCP may elect to receive credit for its percentage of all SDG&E-signed RPS contracts including long-term contracts.
- The CPUC determined that SDG&E owes SDCP customers the RPS value for the RPS contracts for which SDCP customers are paying the exit fee.
- For RPS allocations to qualify as SDCP long-term contracts, the contracts must have 10 or more years remaining prior to expiration.

CPUC Decision 21-05-030

“Voluntary Allocations shall comprise a “slice” of an IOU’s entire PCIA-eligible RPS portfolio. Load serving entities (LSEs) may elect to take a short-term allocation, a long-term allocation, or may choose to decline all or a portion of their allocation... LSEs will be offered allocations of the RPS portfolio in proportion to their vintaged, forecasted annual load share.”

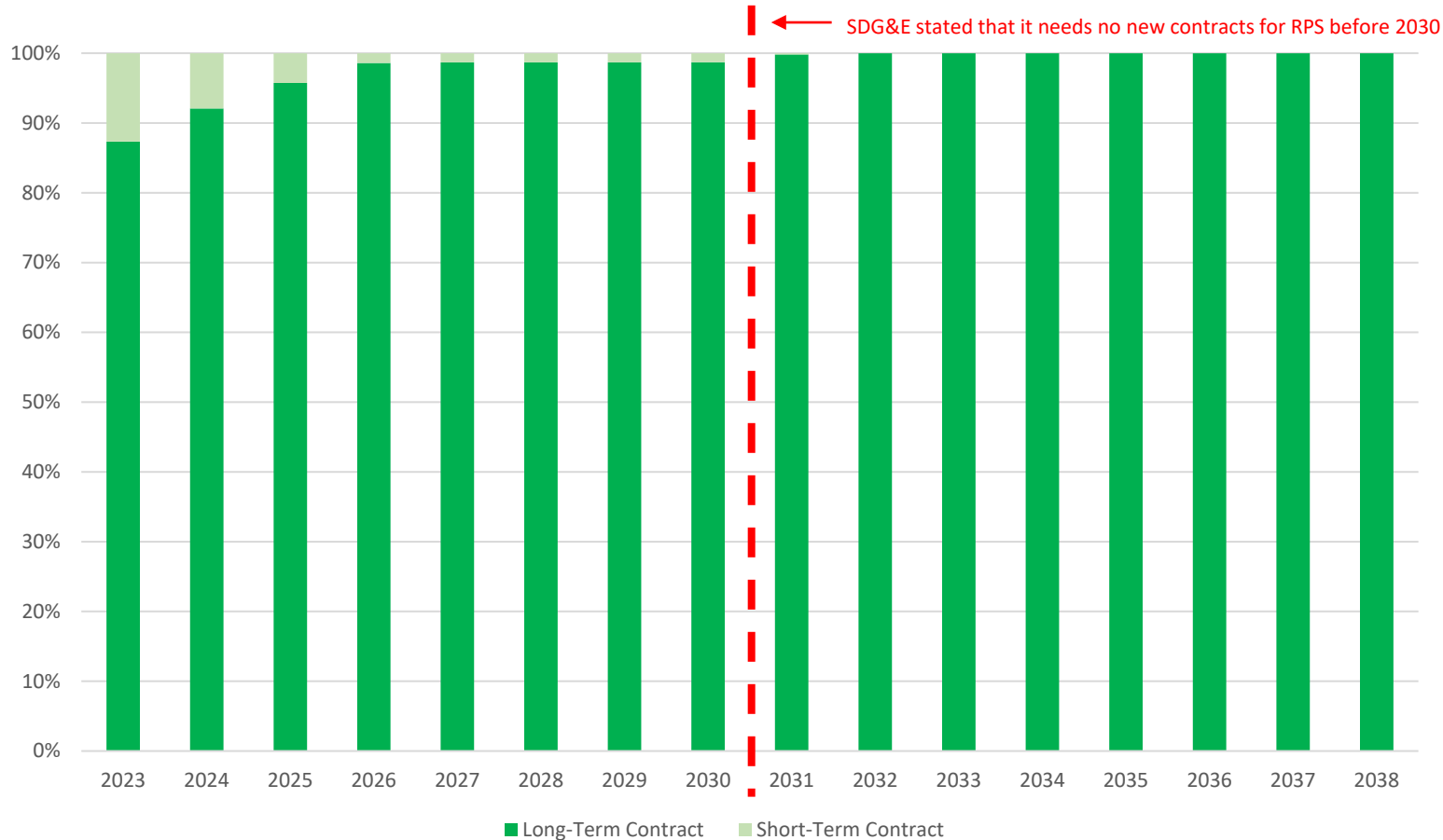
SDG&E RPS Contracts, 10 Years Remaining

SDG&E's RPS contracts with 10 years or more until expiration as of January 1, 2022

- Estimated production through 2030 only, even though all contracts listed below expire between 2032 and 2038.
- Pursuant to CPUC Decision 21-05-030, only contracts with 10+ years remaining will have a long-term credit allocated to CCAs

						SDG&E Generation Estimate from 2020 RPS Draft Procurement Plan											
Index	Contract Name	CP3 Probability	Technology	Contract Stop Date Minus 2022-01-01	Capacity (MW)	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
14	City of Oceanside (San Francisco Peak Hydro)	100.0	1 Small Hydro	0	361	361	361	361	361	361	361	361	361	361	361	361	361
15	City of Escondido (Bear Valley Hydro)	100.0	1 Small Hydro	2	2,479	2,479	2,479	2,479	2,479	2,479	2,479	2,479	2,479	2,479	2,479	2,479	2,479
1	San Diego Gas & Electric (Ramona Solar Energy)	20.8	1 UOG Solar	4	11,871	11,871	11,871	11,871	11,871	11,871	11,871	11,871	11,871	11,871	11,871	11,871	11,871
19	CSolar IV West LLC	19.5	1 Solar PV	150	379,496	379,496	379,496	379,496	379,496	379,496	379,496	379,496	379,496	379,496	379,496	379,496	379,496
21	Desert Green Solar Farm LLC	17.9	1 Solar PV	6	13,034	13,034	13,034	13,034	13,034	13,034	13,034	13,034	13,034	13,034	13,034	13,034	13,034
29	SG2 Imperial Valley LLC	17.9	1 Solar PV	150	418,406	418,406	418,406	418,406	418,406	418,406	418,406	418,406	418,406	418,406	418,406	418,406	418,406
23	Sol Orchard 20 LLC (Ramona 1)	17.0	1 Solar PV	2	4,364	4,364	4,364	4,364	4,364	4,364	4,364	4,364	4,364	4,364	4,364	4,364	4,364
24	Sol Orchard 21 LLC (Ramona 2)	17.0	1 Solar PV	5	10,016	10,016	10,016	10,016	10,016	10,016	10,016	10,016	10,016	10,016	10,016	10,016	10,016
25	Sol Orchard 22 LLC (ValleyCenter 1)	17.0	1 Solar PV	3	5,373	5,373	5,373	5,373	5,373	5,373	5,373	5,373	5,373	5,373	5,373	5,373	5,373
26	Sol Orchard 23 LLC (ValleyCenter 2)	17.0	1 Solar PV	5	10,265	10,265	10,265	10,265	10,265	10,265	10,265	10,265	10,265	10,265	10,265	10,265	10,265
28	Catalina Solar LLC	16.9	1 Solar PV	109	265,654	265,654	265,654	265,654	265,654	265,654	265,654	265,654	265,654	265,654	265,654	265,654	265,654
27	Arlington Valley Solar Energy III LLC	16.9	1 Solar PV	127	359,908	359,908	359,908	359,908	359,908	359,908	359,908	359,908	359,908	359,908	359,908	359,908	359,908
18	CSolar IV South LLC	16.8	1 Solar PV	130	302,042	302,042	302,042	302,042	302,042	302,042	302,042	302,042	302,042	302,042	302,042	302,042	302,042
30	Imperial Valley Solar 1 LLC (Mt. Signal, Silver Ridg	16.8	1 Solar PV	200	531,257	531,257	531,257	531,257	531,257	531,257	531,257	531,257	531,257	531,257	531,257	531,257	531,257
2	97W18ME LLC (Midway Solar Farm III)	16.7	1 x Solar PV	20	46,660	46,162	45,930	45,698	45,466	45,234	45,002	44,770	44,538	44,306	44,074	43,842	43,610
20	Solar Borrego I LLC	16.1	1 Solar PV	26	67,930	67,930	67,930	67,930	67,930	67,930	67,930	67,930	67,930	67,930	67,930	67,930	67,930
36	NLP Valley Center Solar LLC	15.9	1 Solar PV	2	5,772	5,772	5,772	5,772	5,772	5,772	5,772	5,772	5,772	5,772	5,772	5,772	5,772
35	NLP Granger A82 LLC	14.7	1 Solar PV	3	7,455	7,455	7,455	7,455	7,455	7,455	7,455	7,455	7,455	7,455	7,455	7,455	7,455
32	70SM1 8me LLC (Calipatria)	14.1	1 Solar PV	20	46,132	46,132	46,132	46,132	46,132	46,132	46,132	46,132	46,132	46,132	46,132	46,132	46,132
33	Tallbear Seville LLC	14.0	1 Solar PV	20	55,174	55,174	55,174	55,174	55,174	55,174	55,174	55,174	55,174	55,174	55,174	55,174	55,174
56	Energia Sierra Juarez US LLC	13.4	1 Wind	155	457,140	457,140	457,140	457,140	457,140	457,140	457,140	457,140	457,140	457,140	457,140	457,140	457,140
17	Centinela Solar Energy 2 LLC	12.6	1 Solar PV	45	131,836	131,836	131,836	131,836	131,836	131,836	131,836	131,836	131,836	131,836	131,836	131,836	131,836
16	Centinela Solar Energy LLC	12.6	1 Solar PV	125	364,694	364,694	364,694	364,694	364,694	364,694	364,694	364,694	364,694	364,694	364,694	364,694	364,694
31	Cascade Solar LLC	12.0	1 Solar PV	18	54,611	54,611	54,611	54,611	54,611	54,611	54,611	54,611	54,611	54,611	54,611	54,611	54,611
22	Campo Verde Solar LLC	11.8	1 Solar PV	139	348,869	348,869	348,869	348,869	348,869	348,869	348,869	348,869	348,869	348,869	348,869	348,869	348,869
52	Naturener Rim Rock Wind Energy LLC	11.8	1 Wind	189	538,799	538,799	538,799	538,799	538,799	538,799	538,799	538,799	538,799	538,799	538,799	538,799	538,799
13	Olivenhain Municipal Water District	11.8	1 Small Hydro	0	34,219	34,219	34,219	34,219	34,219	34,219	34,219	34,219	34,219	34,219	34,219	34,219	34,219
55	Ocotillo Express LLC	11.6	1 Wind	265	571,206	571,206	571,206	571,206	571,206	571,206	571,206	571,206	571,206	571,206	571,206	571,206	571,206
8	Otay Landfill Gas LLC (Otay Landfill V)	11.5	1 Biogas	2	9,486	9,486	9,486	9,486	9,486	9,486	9,486	9,486	9,486	9,486	9,486	9,486	9,486
9	Otay Landfill Gas LLC (Otay Landfill VI)	11.5	1 Biogas	2	8,981	8,981	8,981	8,981	8,981	8,981	8,981	8,981	8,981	8,981	8,981	8,981	8,981
45	San Diego Gas & Electric (Towersat Bressi Ranch)	11.2	1 UOG Solar	0	141	141	141	141	141	141	141	141	141	141	141	141	141
57	Manzana Wind LLC	11.0	1 Wind	100	271,416	271,416	271,416	271,416	271,416	271,416	271,416	271,416	271,416	271,416	271,416	271,416	271,416
53	Pacific Wind Lessee LLC	10.6	1 Wind	140	316,884	316,884	316,884	316,884	316,884	316,884	316,884	316,884	316,884	316,884	316,884	316,884	316,884
41	San Diego Gas & Electric (Ladera Ranch I)	10.6	1 UOG Solar	0	86	86	86	86	86	86	86	86	86	86	86	86	86

SDG&E RPS Contracts Long-Term versus Short-Term by Total Estimated Annual Production (Assuming a Jan 1, 2022 CCA Launch Date)



RPS Contract Requirements

- All energy providers must procure RPS qualifying energy
- 65% of energy providers' contracts must be long-term

SDG&E Contracts for CCAs

- 87% of SDG&E RPS contracts' estimated energy generation remains long-term as of 2022

SDCP to Serve 54% of Demand

According to the California Energy Commission’s IEPR SDCP is projected to serve 54% of bundled plus unbundled customer demand. Thus according CPUC Decision 21-05-030, 54% of RPS contract attributes will be transferred to SDCP.

CEC Load Forecasts (in Gigawatt Hours) by Load-Serving Entity From 2020 through 2030 (March 4, 2020 version of the IEPR Form 1.1c)

LSE	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
San Diego Gas & Electric (SDG&E) Planning Area											
SDG&E (Bundled)	13,959	10,383	5,359	5,349	5,359	5,385	5,416	5,457	5,500	5,543	5,585
SDG&E (Direct Access)	3,827	3,940	3,940	3,940	3,940	3,940	3,940	3,940	3,940	3,940	3,940
Clean Energy Alliance	-	144	929	927	929	933	938	946	953	960	968
San Diego Community Power	-	3,227	7,407	7,393	7,406	7,442	7,485	7,541	7,601	7,660	7,719
SDCP percent of total excluding Direct Access		23.5%	54.1%	54.1%	54.1%	54.1%	54.1%	54.1%	54.1%	54.1%	54.1%

Pacific Energy Advisors' presentation on RPS Requirements (slide 2)

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RPS Requirements for CP 4

Compliance Period 4	2021	2022	2023	2024	Total
Retail Sales (GWh)	1,977	6,787	6,906	6,941	22,611
Gross RPS %	35.8%	38.5%	41.3%	44.0%	40.2%
Required RPS (GWh)	708	2,613	2,852	3,054	9,227
Gross RPS LT %	65.0%	65.0%	65.0%	65.0%	65.0%
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Voluntary RPS (GWh)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total RPS (GWh)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

- To demonstrate RPS compliance, the noted/circled volumes (GWh) for CP 4 must be procured and timely retired.
- SDCP's CP4 Long-Term contracting obligation is approximately [REDACTED]

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RPS Asserted Requirements by SDCP's Contractor PEA

- LT = long term RPS contracts
- The table's data source for retail sales remains unclear
- SDCP redacted large portions of its response to the PCF data request, forcing PCF to verify all long-term RPS requirements and forecasts through other sources.

SDCP to Serve 54% of Demand

By using SDG&E allocations alone, SDCP will achieve an excess of banked credits of long-term RPS contracts through at least 2030 when RPS contracts must equal or exceed 60% of load and long-term contracts must equal or exceed 65% of total RPS minimum load.

Row	Label	Calculation	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
A	RPS % of Total Demand	Source Data	35.80%	38.50%	41.30%	44.00%	46.70%	49.30%	52.00%	54.70%	57.30%	60.00%
B	Total SDCP Demand (GWh)	Source Data	3,227	7,407	7,393	7,406	7,442	7,485	7,541	7,601	7,660	7,719
C	Total SDCP Required RPS (GWh)	A x B	1,155	2,852	3,053	3,259	3,475	3,690	3,921	4,158	4,389	4,631
D	Total SDCP Required Long-Term RPS (65% of RPS) (GWh)	B x 0.65	751	1,854	1,985	2,118	2,259	2,399	2,549	2,703	2,853	3,010
F	SDG&E contracted long-term RPS (GWh)	Source Data	5,063	5,063	5,062	5,062	5,062	5,062	5,062	5,061	5,061	5,061
G	SDG&E allocation of long-term RPS contract to SDCP (54% of RPS as of 2022)(GWh)	F x 0.54		2,734	2,734	2,734	2,733	2,733	2,733	2,733	2,733	2,733
H	SDCP Shortfall or excess before SDCP contracting and banking (GWh) (positive # equals shortfall)	D - G		-880	-749	-615	-474	-335	-184	-31	120	278
I	SDCP banked long-term credits (GWh)	(Prior Year's I) - H	0	880	1629	2245	2719	3054	3238	3269	3149	2871

Source Data:

- San Diego Gas & Electric Company (U 902 E) Draft 2020 Renewables Portfolio Standard Procurement Plan, PDF p. 445-450
- CPUC, Proceeding R.16-02-007, Administrative Law Judge's Ruling Correcting April 15, 2020 Ruling Finalizing Load Forecasts And Greenhouse Gas Benchmarks For Individual 2020 Integrated Resource Plan Filings (May 20, 2020), Attachment A, PDF pp. 8-9.

2030: SDCP Retains Excess Long-Term RPS



PCF's calculations using CPUC and CEC source data for forecasted SDCP load is more conservative than SDCP's data sources (assumes higher load forecast and therefore higher RPS needs). Despite the conservative assumptions, PCF's calculations show that SDCP has enough long-term RPS contract allocations to meet RPS long-term contract requirements through 2028 without banked credits and beyond 2030 with banked credits. SDCP projected to end 2030 with almost a year of excess banked credits.

Source	Label	2022	2023	2024	2025	2026	2027	2028	2029	2030
SDCP	Total SDCP Required RPS (GWh)	2,613	2,852	3,054	x	x	x	x	x	x
SDCP	Total SDCP Required Long-Term RPS (65% of RPS) (GWh)	1,698	1,854	1,985	x	x	x	x	x	x
PCF	Total SDCP Required RPS (GWh)	2,852	3,053	3,259	3,475	3,690	3,921	4,158	4,389	4,631
PCF	Total SDCP Required Long-Term RPS (65% of RPS) (GWh)	1,854	1,985	2,118	2,259	2,399	2,549	2,703	2,853	3,010
PCF	SDCP Shortfall or excess before applying SDCP banked credits (GWh)(positive # equals shortfall)	-880	-749	-615	-474	-335	-184	-31	120	278
PCF	SDCP banked long-term credits after applying credits/banking credits for the current year (GWh)	880	1629	2245	2719	3054	3238	3269	3149	2871
PCF	balancing requirements with banked long-term RPS credits (GWh)	0	0	0	0	0	0	0	0	End 2030: 2871 GWh banked

Meets RPS Reqs
Shortfall

Source Data:

- San Diego Gas & Electric Company (U 902 E) Draft 2020 Renewables Portfolio Standard Procurement Plan, PDF p. 445-450
- CPUC, Proceeding R.16-02-007, Administrative Law Judge's Ruling Correcting April 15, 2020 Ruling Finalizing Load Forecasts And Greenhouse Gas Benchmarks For Individual 2020 Integrated Resource Plan Filings (May 20, 2020), Attachment A, PDF pp. 8-9.

No New SDCP Long-Term Contracts Needed to Meet RPS Long-Term Obligations

- The CPUC issued Decision 21-05-030 on May 20, 2021
- D.21-05-030 effectively allocates to SDCP the RPS compliance value equal to the SDG&E RPS contracts' percent of load departing to SDCP.
- SDCP percent of load for original 5 member JPA equals approximately 54% as shown in the previous slides. However, as the JPA gains members, both the percent of load served and the SDG&E allocation percent of RPS contract attributes will continue to grow in tandem. SDCP will have to watch the 10-year remaining requirement that impacts the long-term versus short-term RPS credits to SDCP from SDG&E.
- As of May 20, 2021, SDCP did not need to sign new RPS qualifying contracts with a start date before 2030.