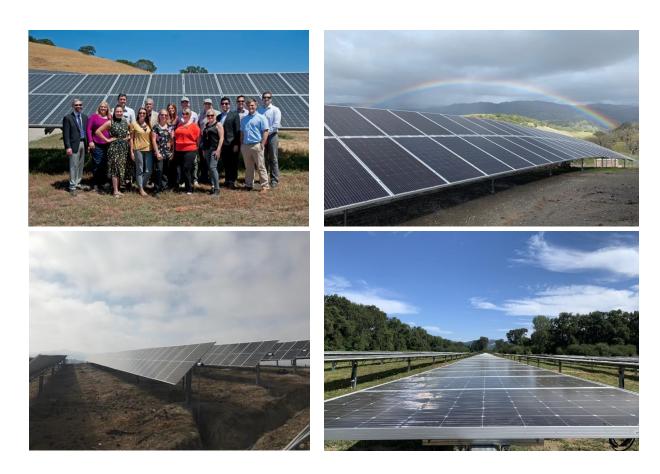


2021 EverGreen Local Resource Plan



Approved 05/06/2021

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1 Executive Summary

The 2021 Local Resource Plan establishes a planning methodology, priority framework, evaluation metrics, and implementation plan for the development of new local renewable and storage resources to meet the energy demands of Sonoma Clean Power's (SCP) EverGreen customers, The Local Resource Plan addresses resources and strategies in Sonoma and Mendocino counties for SCP's 100% local renewable 24x7 EverGreen customers only.

The EverGreen program was established in May 2014 when SCP first began serving customers. It is an option for customers who wish to upgrade from SCP's standard CleanStart Program. SCP's CleanStart program utilized 50% renewable energy in 2019 from resources located across the state and neighboring states that supply energy to California. Evergreen uses 100% local renewable energy both day and night using local solar energy and local geothermal from the Geysers.

SCP's EverGreen program is the first of its kind in California, being the only program to offer 100% local, renewable power than runs 24x7. EverGreen does not rely on natural gas or other non-renewables as it uses both solar and geothermal renewable energy. EverGreen customers can eliminate nearly all greenhouse emissions from their electricity use. By switching to an electric vehicle (EV), EverGreen customers can charge their EV with clean, local, renewable energy.

Participation in EverGreen supports new local renewable energy development. SCP built 6 MW of new local solar in Sonoma and Mendocino counties for the benefit of EverGreen customers. Now with growing Evergreen participation, including the City of Santa Rosa in 2020 and City of Petaluma in 2021, SCP can now develop further local renewable and storage resources to meet increasing demand.

While EverGreen participation currently is about 3% of SCP's total electricity load, participation has more than tripled from less than 1% in 2019 and continues to grow. More participation in EverGreen will support the build-out of more new local renewable resources. SCP also uses EverGreen as a case study in how our overall portfolio and how California as a whole can move to 100% clean energy around the clock. EverGreen is also an example of what the future of the electric grid can be for California and what it means to have a renewable portfolio that also contributes to the reliability of the grid.

The Local Resource Plan set of assumptions and forecasts will be updated each year as SCP re-evaluates supply and demand for EverGreen. Every two years the Plan will be revisited, and an updated Local Resource Plan will be published.

The main priorities for the 2021 Local Resource Plan, established during a public input process, were building new resources, cutting emissions as much as possible, matching the hourly output to demand, keeping resources within our territory, and using local labor. Keeping the EverGreen premium rates at or below the current premium of 2.5 cents per kWh is also a main priority for SCP, particularly in relation to increasing participation and inclusion of low-income and disadvantaged communities and customers.

The framework of the Local Resource Plan centers around the following 3 pillars:

- 1. Emissions reduction
- 2. Local electricity resiliency
- 3. Equity and Local Investment

According to this framework the evaluation metrics SCP will use to assess potential local projects are as follows:

- <u>Availability-</u> Projects must utilize resources available in Sonoma and Mendocino counties.
- <u>Constructability-</u> Projects must demonstrate that they can be permitted, constructed, and interconnected to the grid.
- GHG Emissions Mitigation- SCP has established a goal of mitigating 110 metric tons of CO2 emissions per GWh of EverGreen demand from the California electricity grid. By virtue of setting the goal on a per GWh basis, emissions mitigation is measured at the time energy is delivered to the grid.
- <u>Air Quality-</u> Projects must not increase overall criteria air pollutant emissions in California.
- <u>Cost-</u> SCP has set a priority for the EverGreen premium rate to be at or below the current rate premium of 2.5 cents per kWh.
- <u>Demand Matching-</u> Projects must contribute to matching the needs of SCP's EverGreen customer load on an hourly basis.
- <u>Resiliency/Reliability-</u> Projects will be evaluated in terms of the ability, or contribution to the future potential, to provide SCP customers with reliable energy during periods of Public Safety Power Shutoffs (PSPS), rolling blackouts, planned outages, and other unplanned outages such as natural disasters.
- Equity and Local Investment Projects will be evaluated regarding the holistic benefits to under-served and under-represented customers and communities including cost, the number of local jobs, contribution to local revenue sources, and access to clean energy and air.

The total portfolio capacity in megawatts (MW) for the Local Resource Plan will be determined based on ongoing adjustments as EverGreen load is added or lost, and the specific resources procured will be determined by the evaluation metrics above, however a suitable scenario could be 9 MW of incremental solar and 8 MW x 4-hour incremental storage.

The 2021 Local Resource Plan uses a multi-pronged approach for implementation that serves to:

- 1) maintain or reduce EverGreen costs,
- 2) capitalize on unique and advanced projects,
- 3) canvas the market for unknown opportunities.
- 4) partner with local jurisdictions, public agencies, and/or schools for co-benefits,
- 5) use previously developed land and rooftops for alternative revenue stream to local business and customers.

- 6) improve access to EverGreen for customers of low and moderate incomes, and
- 7) enhance distribution grid resiliency at cost-effective, beneficial locations.

In addition, SCP will continue to explore how customer-owned and sited resources could contribute to EverGreen resources in the near future.

This multi-pronged implementation approach and timeline is shown below:

	Implementation Strategy	Timeline
1	Monitor & identify potential grant funding opportunities for local projects	Ongoing
2	Bi-lateral and public private partnerships	Ongoing, however will direct any potential projects to any upcoming planned RFP or solicitation before considering
3	Issue utility scale RFP for local renewable and storage projects	Issue RFP within 30 days of Board approval of this plan and target executing first supply contract(s) in 2022.
4	Issue RFI for large commercial & municipal rooftop and previously developed sites	Issue RFI within 90 days of Board approval of this plan.
5	ProFIT battery storage	Within 90 days of Board approval of this plan, begin engaging with existing ProFIT project owners on possibility to add battery storage on existing sites.
6	Customer programs	Ongoing evaluation of opportunities for customer programs to contribute to EverGreen resources as part of SCP's ongoing Programs Strategic Action Plan process.
7	Identify programs and projects for low-income and disadvantaged communities	Within 90 days of Board approval of this plan, begin engaging with community leaders and citizens.
8	Analyze grid for PSPS solutions	Immediate and ongoing
9	Community outreach & partnerships	Ongoing in conjunction with SCP's comprehensive outreach and partnership program.
10	Education	By the end of 2021, begin engaging with Energy Education Program for Schools to provide customized curriculum for EverGreen. Target August 2022 to begin teaching additional EverGreen curriculum at schools.
11	Research & Development	Ongoing
12	Update forecast and re-instigate implementation strategies 2 and 3	For every 4 GWh increase in annual EverGreen energy from last RFP or solicitation.
13	2023-2024 Local resource planning cycle	Q4 2022 Restart public workshop process

1.1 Updates from Previous Local Resource Planning Cycle

2021 is the first year of a two-year planning cycle for the Local Resource Plan. This Plan will be updated in 2023. This 2021 planning cycle will help establish criteria of success and use lessons learned to improve future planning cycles. The 2021 planning

cycle will evaluate, measure, and verify methodologies and strategies implemented to provide EverGreen customers with 24x7 local renewable power that reduces emissions, aids resiliency and reliability, assists in equitable access to clean energy, and is cost-effective.

2 Background

2.1 SCP Introduction

The Sonoma Clean Power Authority (SCP) is a public power provider operating a Community Choice Aggregation or "CCA" within SCP's joint powers authority. Following the 2000 Energy Crisis, the California legislature created CCAs to help provide public oversight into energy markets, and ensured that wherever a CCA was established it would become the default electricity provider. SCP is the default electricity provider for customers in Sonoma and Mendocino Counties in California (with the exception of the Cities of Healdsburg and Ukiah). SCP's mission is to turn the tide on the climate crisis, through bold ideas and practical programs.

SCP began serving customers in May 2014 and today serves approximately 228,000 residential and non-residential accounts across Sonoma and Mendocino counties.

2.2 EverGreen Introduction

EverGreen is an option for SCP customers who wish to upgrade from SCP's standard CleanStart service. SCP's CleanStart service was 50% renewable energy in 2019 (compared to PG&E's 29% renewable power mix). Evergreen uses 100% local renewable energy both day and night. EverGreen customers are powered by newly constructed local solar energy and local geothermal from the Geysers.

EverGreen customers pay a 2.5 cent/kWh premium above the cost of CleanStart. The premium paid by EverGreen customers helps build new local, renewable energy facilities.

SCP's EverGreen service is the first of its kind in California, being the only electricity service to offer 100% local, renewable power than runs 24 hours a day, 7 days a week. It eliminates nearly all greenhouse emissions from customer electricity use and for customers with electric vehicles who charge on EverGreen, it also eliminates nearly all their transportation emissions.

EverGreen can be used as a case study of how SCP's entire portfolio (including CleanStart) and the California electric grid at large can move toward 100% clean energy around the clock and what it means to have a renewable portfolio that also contributes to the reliability of the grid.

2.2.1 EverGreen Participation

EverGreen participation has grown throughout the years. Figure 1 shows the growth of residential and non-residential EverGreen customers from the beginning of SCP service in May 2014.

Figure 1: Historical EverGreen Meter Count

3,500

3,000

2,500

1,500

1,000

500

yuni beci yu

■Residential ■Non-Residential ■Municipal

The large step increases shown in Figure 1 are primarily due to phases in which new territories were added to SCP service creating an opportunity for more people to sign up for EverGreen, and the decision of member jurisdictions to switch their municipal electricity accounts to EverGreen. The largest step increase shown in the

summer of 2020 is from the City of Santa Rosa joining EverGreen. The City of

EverGreen effective July 2021.

Figure 2 shows the increase in EverGreen electricity usage (load) since 2014. EverGreen electricity use has more than doubled due to the addition of City of Santa Rosa accounts in Summer 2020.

Petaluma also voted on 2/22/2021 to convert their municipal electricity accounts to

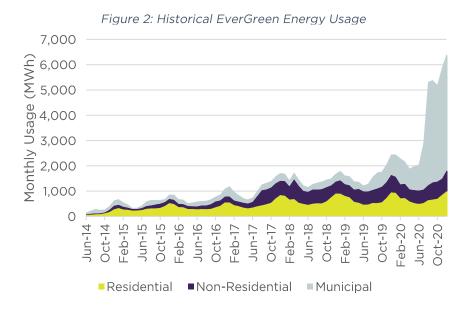


Figure 3 shows the percent of total SCP load that has been comprised of EverGreen customers over the years.

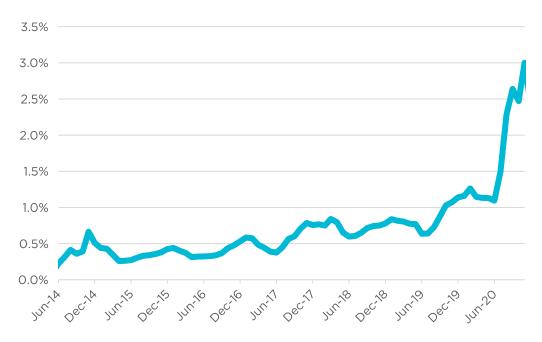


Figure 3- Historical EverGreen Share of SCP Total Load

Figure 3 shows the percent of total load steadily growing through the years and now sitting at approximately 3%. While this seems like a small amount, it has more than tripled from less than 1% in previous years and continues to grow. As part of the Local Resource Plan, SCP hopes that participation and demand will grow further so SCP can continue to build new local renewable resources.

2.3 Local Resource Plan Purpose/Objectives

This Local Resource Plan establishes the priorities, methodologies, local resource project considerations and evaluation metrics, implementation strategies, targets, and timeline to build out new local resources to meet the energy demands of EverGreen customers.

The Local Resource Plan will be a subset of SCP's larger Integrated Resource Plan. This Local Resource Plan focuses solely on local renewable resources only to serve EverGreen customers, while our larger Integrated Resource Plan will be established to meet the energy and reliability demands of all SCP customers.

2.4 Local Resource Plan Process

This Local Resource Plan has been developed with input from the public. The public had multiple opportunities in different formats to help shape the plan.

The planning process for this Local Resource Plan is shown in Table 1.

Table 1: Local Resource Plan timeline

Date	Event	Description
12/1/2020	Public Workshop #11	A virtual workshop ² was held to receive public input into local resource type preferences and EverGreen priorities. There were 44 public attendees.
12/1/2020	Public Workshop #1 online survey	An online survey was distributed and posted on SCP's website for written comment on Public Workshop #1. SCP received 106 responses.
12/2/2020	Public Workshop #1 video recording	A video recording of Public Workshop #1 was posted on the SCP website EverGreen page.
12/16/2020	CAC meeting	SCP presented Public Workshop #1 and received further public input.
01/03/2021	BOD meeting	SCP presented Public Workshop #1 and received further feedback.
01/12/2021	Public Workshop #2	A virtual workshop was held to receive public input into technical aspects of the plan including EverGreen demand and resource supply selection methodology. There were 46 public attendees.
1/12/2021	Public Workshop #2 online survey	An online survey was distributed and posted on SCP's website for written comment on Public Workshop #2. SCP received 105 responses.
01/13/2021	Public Workshop #2 video recording	A video recording of Public Workshop #2 was posted on the SCP website EverGreen page.
01/21/2021	CAC meeting	SCP presented Public Workshop #2 and received further public input.
02/04/2021	BOD meeting	SCP presented Public Workshop #2 and received further feedback.
03/18/2021	CAC meeting	SCP received feedback and direction on the Draft Local Resource Plan.
04/01/2021	BOD meeting	SCP received feedback and direction on the Draft Local Resource Plan.
04/15/2021	CAC meeting	SCP received feedback and CAC recommendation to the Board to approve Final Local Resource Plan.
05/06/2021	BOD meeting	Board of Directors approved Final Local Resource Plan.

¹ See the following Links for Public workshop materials: Workshop 1 & Workshop 2

² The 2021 Local Resource Plan public workshop process was conducted virtually due to the COVID-19 pandemic. SCP Plans for future public workshop to be conducted both in person and virtually if allowable and safe to do so.

The Local Resource Plan set of assumptions and forecasts will be updated each year as SCP re-evaluates supply and demand for EverGreen. Every two years the Plan will be revisited, and an updated Local Resource Plan will be published.

2.5 Current EverGreen Resources

The current EverGreen resource mix consists of local solar energy from SCP's feed-in-tariff program (ProFIT) and local geothermal from the Geysers.

2.5.1 ProFIT History

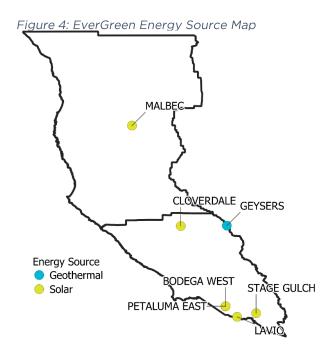
Local renewable energy development projects to date for EverGreen were achieved under SCP's ProFIT program. The ProFIT program was completed in early 2021 and is now closed, but those resources will continue to serve EverGreen customers for years to come. The Local Resource Plan is about the additional resources that go beyond SCP's completed ProFIT program.

SCP's ProFIT program provided a standard feed-in-tariff contract or power purchase agreement (PPA) for new-build renewable projects located in SCP territory. The program was technology agnostic and allowed any RPS compliant source of energy less than 1 MW to apply. The standard PPA included:

- A 10-year term for geothermal or bioenergy facilities, and a 20-year term for other sources.
- A fixed purchase price of \$95/MWh
 - o This price was set in 2014 based on smaller scale renewable costs at that time. Renewable costs have decreased significantly since then.
- Several incentive adders for the first 5 years of the contract were available. Incentive adders were given for projects:
 - less than 250 kW
 - o projects on previously developed land
 - o projects that used local labor, and
 - o projects that promoted local apprenticeship training.

The ProFIT program offered PPAs on a first-come first-served basis for any project that met the requirements of the program, had an interconnection agreement tendered, and permits submitted. The ProFIT program targeted building 6 MW of new renewable resources inside SCP's territory.

Though the ProFIT program was technology agnostic, all the projects given ProFIT PPAs were solar photovoltaic projects. The final 1 MW project became operational in February 2021, achieving SCP's 6 MW goal. The 6 ProFIT solar projects, all just under 1 MW, are as follows: 1 project in Willits, 1 project in Cloverdale, and 4 projects in Petaluma. Figure 4 shows the current EverGreen local resources.



2.5.2 Supply Mix to Demand

SCP's initial goal was to achieve 50% new local supply and 50% existing geothermal. With the rapid increase of EverGreen electricity demand, more local resources are now required to meet the new local supply goal. Whereas 6 MW was the appropriate amount for previous participation and growth trends, further new-build resources are now required if we choose to keep new local renewable supply at or near 50%.

Figure 5 shows the current ProFIT annual solar supply for the EverGreen electricity demand. The remainder of EverGreen supply is met with existing geothermal from the Geysers to match the EverGreen demand.

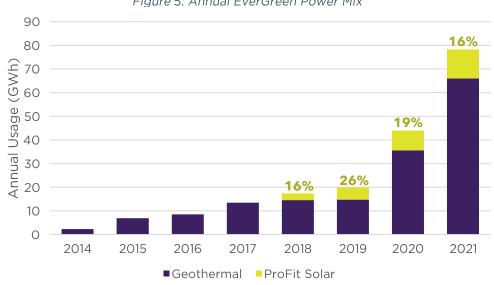


Figure 5: Annual EverGreen Power Mix

3 Local Resource Planning Methodology

3.1 Priorities & Framework

The main priorities for the Local Resource Plan established during the public input process were building new resources, cutting emissions as much as possible, matching the hourly output to demand, keeping resources within our territory, and using local labor. Keeping the EverGreen premium rates at or below the current premium of 2.5 cents per kWh is also a main priority for SCP, particularly in relation to increasing participation and inclusion of under-represented and CARE/FERA customers.

The framework of the Local Resource Plan centers around 3 pillars: emissions reduction, local electricity resiliency, and equity and local investment. Each of the priorities identified above contributes to these 3 pillars.

3.1.1 Emissions Reduction

SCP's Local Resource Plan will help the SCP community and the whole state reduce emissions through supporting existing renewable generation and through building new incremental renewable and storage projects. New renewable projects proposed for EverGreen resources will be assessed utilizing an hourly methodology that determines how well they match the EverGreen hourly load. This eliminates the need to rely on system power from the California electricity grid, especially during the evening hours when system emissions are usually the largest. Matching hourly resources to demand may also consist of customer-owned so-called "demand side" resources to shape load, and as such SCP considers demand side resources an integral part of building new resources to match hourly demand and will assess their emissions reduction contribution.

3.1.2 Resiliency

SCP's Local Resource Plan strives to improve local electricity resiliency during PSPS and other power outages to the most impacted customers within SCP territory. SCP does not control Public Safety Power Shutoffs or manage the distribution or transmission grid, so no direct commitment can be made to improving PSPS or other blackouts. SCP can, however, work with local partners toward a solution by building new resources that could allow customers to retain electricity service during periods of power outage or facilitate future microgrids, resiliency centers or other critical services. The resiliency solution will likely include both supply side and demand side customer-sited resources, along with SCP's separate effort to work with PG&E to identify cost effective grid repair and segmentation strategies.

3.1.3 Equity and Local Investment

SCP sees equity and local investment as an integral part of the climate crisis solution and recognizes the "Climate Gap" which is the disproportionate and concealed impact that climate change has on communities with people of color and low-income. SCP's Local Resource Plan addresses equity through striving to make cleaner sources of energy accessible to all, including low-income and disadvantaged communities, CARE/FERA customers, medically vulnerable customers, minorities, and under-served and under-represented customers. SCP will work toward providing

targeted programs and implementation strategies for under-served and under-represented customers in a cost-effective and practical way. SCP will also consider the local workforce in developing new local resources. SCP's Programs Equity Framework has more information about SCP's work in this area.

3.2 Forecast Methodology

3.2.1 Demand Forecast Methodology

SCP's demand forecast for EverGreen is output from a model trained on weather data, net energy metering (NEM) installations, electric vehicle (EV) accounts, and the historical hourly usage of customers currently enrolled in the program. The model is run against weather data from 2015 through 2020 to evaluate historic weather sensitivity. For this evaluation, enrollment in EverGreen is held constant. However, NEM installations and EV adoption are projected to continue growing. The model is run probabilistically with ranges calibrated for these uncertainties.

Figure 6 is a sensitivity diagram illustrating the range in 2030 energy usage influenced by each uncertainty independently (i.e. the effect different assumptions NEM growth, EV adoption, and weather and impact the energy use forecast).

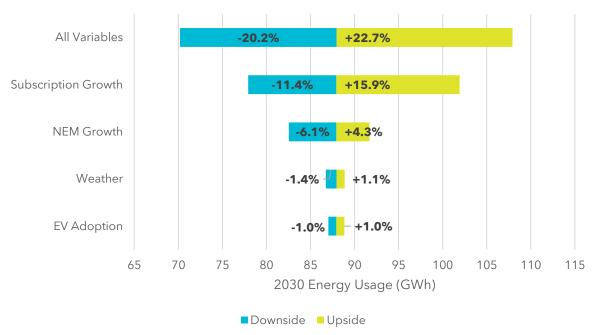


Figure 6: 2030 EverGreen Energy Use Sensitivity to Uncertainties

Although the range in annual energy usage is fairly narrow due to counterbalancing independent variables (e.g. subscription growth, NEM growth, absorbing EV adoption, mild winters alongside hot summers), the range at the monthly, daily, and hourly level is much broader. SCP's demand model runs 378 demand scenarios at an hourly granularity to characterize these uncertainties. These scenarios are used in evaluating the performance of different potential resource portfolios. Figure 7 illustrates the range in simulated monthly usage for the aggregated EverGreen customers. Compared to SCP's CleanStart aggregated customer base, EverGreen aggregated customer usage differences between summer and winter are amplified

due to a higher percentage of NEM participation amongst EverGreen customers. Loads in the Spring are higher due to water pumping and water treatment loads on municipal accounts.

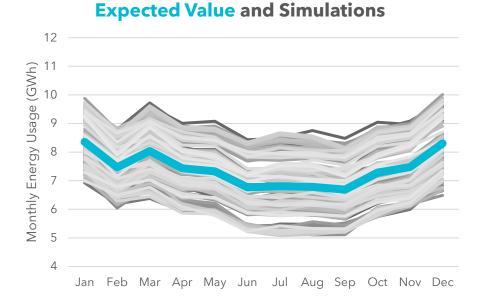


Figure 7: 2030 EverGreen Monthly Usage Simulations

2030 EverGreen Monthly Energy Usage

3.2.2 Incremental Supply Methodology

Historical data and weather trends are used to forecast existing ProFIT solar and geothermal supply to determine incremental supply needed to serve EverGreen load.

The methodology used to forecast incremental supply is dependent on the technology.

- Solar resources are estimated using a model trained on weather data and historic production from ProFIT solar facilities. The model is run on the same weather assumptions as the demand model to properly represent the impact of local cloudy weather.
- Wind is estimated using an hourly profile from the National Renewable Energy Laboratory's Wind Toolkit data for points located inside SCP territory.
- Hydropower is estimated using a monthly historical profile of output from Warm Springs dam hydroelectric facility to represent seasonal trends in the local watershed coupled with hourly assumptions of hydro dispatch from the CPUC.
- Geothermal is considered a base load resource and produces the same amount of energy each hour across the year, although the allocation between CleanStart and EverGreen is allowed to fluctuate based on EverGreen net position need.
- Bioenergy (for this high-level purpose) is considered dispatchable to fill the remaining net position (although dispatchability varies significantly by type of resource). No bioenergy resources will be procured in 2021 for EverGreen, and

- at least until more information about specific opportunities can be identified and studied.
- Battery resources are optimized to shift load from the hours with the lowest net open position to the highest.

In evaluating different technology types, Figure 8 below shows the relative distribution of electric output across a year for different technologies. Figure 9 represents the average distribution of output for each hour by technology.

SCP will also leverage generation forecast data provided by potential suppliers when evaluating portfolios.

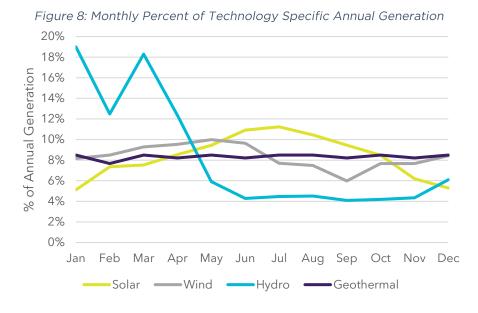
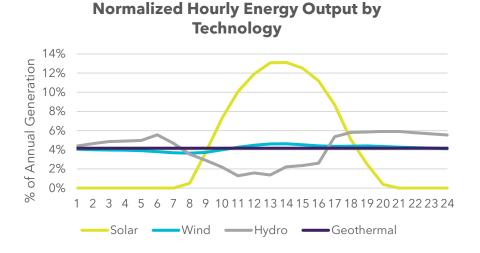


Figure 6: Hourly Percent of Technology Specific Daily Generation



4 Local Resource Supply Considerations

4.1 Evaluation Metrics

The evaluation metrics SCP will use to assess potential local resource supply projects are as follows:

- Availability
- Constructability
- GHG Emissions Mitigation
- Cost
- Demand Matching
- Resiliency/Reliability
- Equity

4.1.1 Availability

In order for a renewable resource to be feasible for development in Sonoma and Mendocino Counties, the resource must be available within the counties' borders. Readily available resources in parts of the world, country and even state may not be available, or may have limited availability in Sonoma County and Mendocino counties.

Ultimately, the availability of resources to serve EverGreen will be determined by responses to a Request for Proposals (RFP) with projects brought forward by developers. SCP staff will also review potential grants and opportunities to collaborate with local jurisdictions on developing resources. Based on experience and available data, SCP expects solar and storage opportunities to be more likely than other technologies. Extra scrutiny will be applied to new technologies to validate their availability.

4.1.2 Constructability

Once the availability of a renewable resource has been deemed acceptable, the constructability of projects utilizing that resource will be considered. An example is that offshore wind has high availability off the coast of Mendocino County however offshore wind construction is not currently allowed off the coasts of Sonoma or Mendocino Counties. Locations within SCP territory that can reasonably accommodate renewable energy projects and the regulatory, permitting and aesthetic issues that come with those locations will be considered by the lead agencies reviewing projects (generally the cities and counties). The Sonoma and Mendocino County Zoning Codes provide allowable uses, permit requirements, provisions and standards for building projects. It is the responsibility of each project developer to reach constructability; the project developer cannot rely on SCP for assistance, and SCP will respect the judgment of the lead agencies in their determination for permits.

As there is currently a demand for incremental EverGreen supply, the ability to quickly construct resources will be a key criteria in evaluating resources. SCP will assess potential permitting risks, developer experience, and land/site ownership.

4.1.3 GHG Emissions

Once the availability and construction feasibility has been established. SCP will evaluate the incremental GHG emissions reduction the specific project is expected to bring. In evaluating the GHG impact of alternatives to serve EverGreen, SCP has adopted a new more sophisticated approach that looks at the hourly displaced CAISO system grid natural gas emissions that directly result from construction of new resources³. The emissions mitigated from any potential EverGreen-specific projects for fuel switching vehicles and buildings will also be incorporated.

SCP is establishing a goal of 110 metric tons of CO2e emissions reduction per GWh of EverGreen load using this methodology. This goal was developed by looking at the performance of a 50% solar portfolio in 2030. This goal is approximately equivalent to taking 15 passenger cars off the road each year for every 100 average homes that join EverGreen. Shifting to an emissions reduction metric gives SCP the flexibility to select resources and programs that are cost effective while also meeting other stated objectives. It also allows for SCP to re-evaluate resource requirements as load changes. For reference, with currently enrolled EverGreen customers, this objective could be achieved with any of the three illustrative portfolios listed below:

- 1. 16 MW of additional solar resources
- 2. 18.5 MW x 4 hours of new energy storage (74 MWh of storage capacity)
- 3. 9 MW of additional solar resources and 8 MW x 4 hours of new storage

Note that the illustrative portfolios above achieve the GHG mitigation goal only. SCP will also evaluate projects within the EverGreen Portfolio based on the other evaluation metrics, including cost and demand matching. Solar without storage, for example, would not be evaluated favorably for demand matching because solar without storage produces energy at the wrong time of day to meet incremental load.

Figure 10 below shows the range of forecasted carbon mitigation for the illustrative 9 MW incremental solar and 8 MW x 4-hour storage portfolio. Uncertainty within each year is caused by changes in solar generation and storage dispatch due to weather. The long-term trend is driven by the CPUC's forecast for the hourly dispatch of gas resources. Note these illustrative resources are presented going forward only to demonstrate SCP's methodology and do not represent the recommended or targeted set of resources. This will be determined using an assessment of all Evaluation Metrics for proposed projects.

³ The new method assesses the amount of natural gas generation on California's grid by comparing the generation profile of new resources against the CPUC's IRP Clean System Power calculator estimate for hours where natural gas resources are on margin from 2020 through 2030. When gas is on margin, it is assumed to be displaceable and new resources are credited with emissions reductions. In hours where gas is not on margin, new resources are not credited with any emissions reductions.

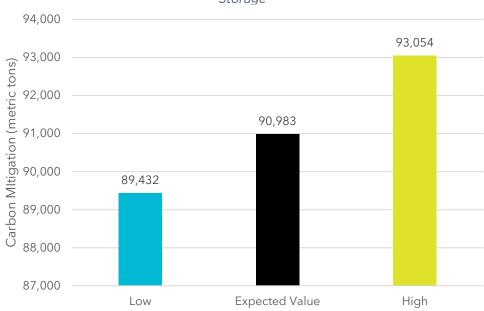


Figure 7: Probabilistic 2030 Cumulative Carbon Mitigation Forecast- 9 MW Solar + 8 MW Battery Storage

Although procurement of existing resources may prompt other parties to develop new clean energy projects that ultimately mitigate GHG emissions, their impact will be ignored in this LRP's evaluation.

The cost of carbon mitigation (\$/metric ton mitigated) will also be used to select potential incremental resource projects by comparing the estimated carbon mitigation to the net cost.

Fuel switching emissions mitigated from any EverGreen-specific programs will be calculated using the default emission factor for the fuel being displaced with local estimates of fuel use patterns.

4.1.4 Anticipated Cost

The cost effectiveness or net cost of resources must be considered in order to compare resources against each other and to determine feasible projects.

The net cost of resources will incorporate all anticipated costs and offsetting revenues. Costs may include a fixed PPA price, program costs, and/or capital and operating costs paid directly by SCP depending on the resource. Offsetting revenue will include the value of energy, surplus renewable energy credits, revenue from ancillary services, and the value of capacity. Recent market data will be used to estimate the value of these revenue streams. The resulting net cost will be compared against the revenue from the EverGreen premium. If opportunities include both ongoing costs and upfront costs, a discounted net cost will also be calculated.

4.1.5 Demand Matching

The ability for a resource to meet the energy demand throughout the hour, day, week, month, and year is a critical consideration for EverGreen. Resources are required to meet both the low load during sunny summer hours when customerowned solar in our region reduces customer net load and during the large increases

in load in the evening when customer-owned solar is not producing and residential energy loads are increasing due to lighting, cooking, heating, cooling, and EV charging. Variable resources such as solar and wind can provide energy during times of resource availability. Baseload resources with constant output can provide energy during all hours, and dispatchable resources can provide the flexibility to meet changes in load. SCP will consider demand matching and dispatchability both from the supply side and the customer demand side.

SCP will directly evaluate demand and supply matching using these main metrics:

- 1. The percentage of energy and hours of over-generation (i.e. the hours in which hourly resource generation exceeds hourly EverGreen demand). Any over-generation in the EverGreen supply will be applied to SCP's overall portfolio or sold at market value generally at a significant financial loss compared with SCP's retail rates.
- 2. The amount of geothermal or dispatchable energy required to maintain balance in the portfolio (i.e., the cumulative hourly energy from other resources need to match the EverGreen demand on an hourly basis).

These metrics will be calculated within the probabilistic demand model to incorporate the uncertainty of weather, NEM growth, and EV adoption. Figure 11 and Figure 12 below show these metrics for the example 9 MW new solar and 8 MW x 4-hour storage portfolio. Both the percentage of hours of over-generation and the share of geothermal and dispatchable energy are expected to increase as NEM generation grows through 2030.

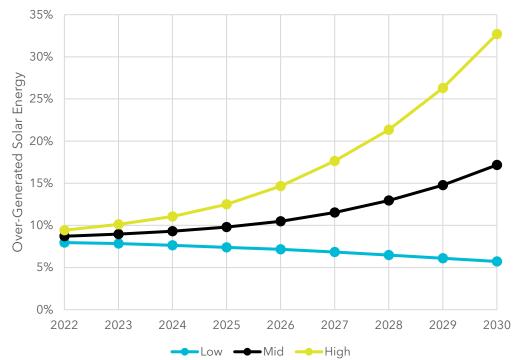


Figure 12: Percent of MWh 9 MW Solar + 8 MW Storage exceeds hourly EverGreen Demand

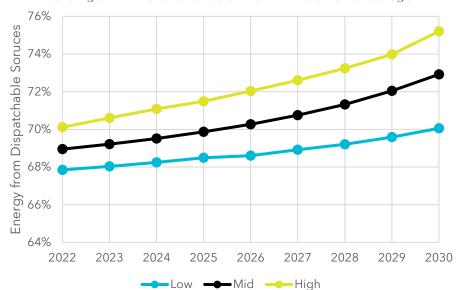


Figure 13: Percent of EverGreen Load needed to be met with geothermal and dispatchable resources by building 9 MW incremental solar + 8 MW incremental storage

4.1.6 Resilience/Reliability

As the California grid incorporates more and more renewable resources that are intermittent in supply, renewable integration must be effectively managed and planned to ensure that the grid remains reliable during periods of low solar and wind renewable supply. Diversity of resources, energy storage, permanent load shifting, and responsive demand side management will be integral in building a 100% clean energy future. By focusing on demand and resource supply matching for EverGreen customers, SCP will lead the way and be a testbed example for scalable grid reliability and thus the demand matching methodology will be used to assess contribution to system-wide reliability.

In the context of SCP's Local Resource Plan, local resilience and reliability will be assessed in terms of the ability or contribution to the future ability to provide SCP customers with reliable energy during periods of PSPS, rolling blackouts, planned outages, and other unplanned outages such as storms.

4.1.7 Equity

To address the "Climate Gap" and work toward providing equitable access to clean energy and programs, SCP will assess projects and strategies in the context of how they impact or benefit low-income and disadvantaged communities socioeconomically and environmentally.

SCP will evaluate the EverGreen cost and will seek to reduce the gap between EverGreen and CleanStart rates in the future, so EverGreen becomes a more viable option to moderate and low-income customers. In addition to rates, SCP will also evaluate the holistic benefits of projects, programs, and strategies for under-served and under-represented customers including the number of local jobs, contribution to local revenue sources, the ability to provide practical and affordable home and vehicle upgrades, and access to clean energy and air.

4.2 RPS Resources-Solar, Geothermal, Wind, Offshore Wind, Hydropower

	SOLAR PV	ONSHORE WIND	OFFSHORE WIND	GEOTHERMAL	HYDROPOWER (<30MW)
Local availability	Abundant	Limited	Good	Abundant	Limited
Constructability	Proven	Not Proven Permitting challenging in high wind areas	Not Proven in California & not allowed under current regulations for Sonoma or Mendocino. SCP will stay engaged with project in Humboldt and return for consideration in future EverGreen procurement.	Proven New construction permitted but likely costly	Not Proven for new construction. Only in-conduit likely permitted, meaning recovering energy from water falling through pipes by gravity
GHG emissions	No generation emissions, but minimal GHG reductions on grid due to midday production (unless paired with storage)	No generation emissions and good GHG reductions on grid	No generation emissions and strong GHG reductions on grid	Very low (~55 IbCO2/MWh) from generation and strong GHG reductions on grid	New construction difficult. Seasonal emissions reductions on grid.
Anticipated cost (actual cost to be determined by any specific proposed project)	Competitive	High in SCP territory due to permitting and mitigation Lower capacity factor	High Requires investment in transmission	Moderate to High Existing resources compete but potentially prohibitive for new	Competitive to High Existing resources compete but high cost for new
Demand matching/ dispatchability	Poor to None Requires pairing with storage to match demand	Moderate Provides needed evening supply but not dispatchable	Moderate Provides near constant energy with needed evening supply but not dispatchable	Moderate Provides constant energy with evening supply but only demand matching if shared with CleanStart	Moderate Provides needed Spring supply but limited flexibility to dispatch

	SOLAR PV	ONSHORE WIND	OFFSHORE WIND	GEOTHERMAL	HYDROPOWER (<30MW)
Resilience/ reliability	Can support resilience projects if distributed and paired with storage	Unlikely to provide resilience except in areas directly adjacent to the resource	If paired with transmission hardening, could provide limited regional resilience at transmission level	Possibly valuable. May require transmission hardening.	Unlikely to provide resilience except in areas directly adjacent to the resource.
Equity	Potential to provide customer-sited resource in low-income & disadvantaged communities or associated with remediation opportunities, provides jobs, and more affordable per MWh.	Could offer jobs, but may not be wanted in low-income and disadvantaged communities	Could offer construction and operating jobs, especially for displaced oil and gas workers due to crossover in offshore labor skills.	Existing jobs. New construction could offer construction and long-term operating jobs Technology is reasonably laborintensive, supplying long-term jobs.	Existing jobs. New construction could provide both short-term construction jobs and operator jobs.

4.3 Bioenergy

Bioenergy projects include landfill gas, dairy and compost digesters, wastewater treatment digesters and woody biomass power. All of these bioenergy resource types are categorized as preferred renewable resources by the CPUC, and certain mandates for procurement are currently applied to the investor-owned utilities (e.g., PG&E). SCP has no State mandates for procurement at this time.

Bioenergy is not currently included in the Table in Section 5.2. because of public concern over the potential environmental impacts from biomass power facilities creating economic demand for forest tree harvesting. SCP will not procure any local bioenergy projects in 2021, and the issue will return for further public input once a potential policy or project can be considered.

SCP's evaluation metrics will determine whether specific bioenergy projects are suitable EverGreen resources.

4.4 Battery Storage

SCP sees storage, and in particular battery storage, as an integral element of the Local Resource Plan. While battery storage is not a renewable resource on its own, it is a critical tool for the effective integration of further renewable buildout.

<u>Local Availability-</u> Battery storage can often be employed at existing renewable facilities, paired with new renewable facilities, or as standalone facilities that can be located almost anywhere that can interconnect with the grid.

<u>Constructability</u>- The most commercially available and proven technology currently is lithium-ion batteries with a 4-hour full capacity load shifting capability. Battery storage projects generally have a short construction timeline and have been proven to obtain permits and interconnection.

GHG Emissions- Battery storage can charge during hours of high renewable generation and low net load and can discharge during hours when renewable generation is low. This means that battery storage in and of itself, even without being directly charged by a renewable resource, can use energy during times where GHG are inherently low on the grid and discharge that power during times of high emissions on the grid. This reduces net emissions and allows for more renewable penetration on the grid overall.

Anticipated Cost- The cost of battery storage has declined steeply in recent years and SCP anticipates that costs will continue to decline as more storage is deployed. Solar plus storage facilities today are competitive with other renewable energy project costs. Battery storage connected to existing and qualifying renewable projects is eligible for a significant federal tax credit. Standalone battery storage is not currently eligible for the federal tax credit, but SCP is working to change this due to the importance and impact battery storage has on the future of renewable energy and overall emissions reduction.

Demand Matching/Dispatchability- Battery storage is an effective resource for demand matching. As noted under "GHG Emissions," battery storage can be charged during times of low net demand and discharged during times of high net demand, particularly in the evening hours when solar resources are ramping down. Battery storage is also extremely dispatchable and can even be used for very short duration dispatching for frequency response on the grid. Battery storage dispatchability is limited by its state of charge (amount the battery is charged from another resource) and discharge duration. Once the battery is fully discharged, it is no longer dispatchable until it recharges.

Resilience/Reliability- Battery storage can be located on the distribution grid where power shutoffs have impacted customers. When combined with solar, batteries could -in theory- provide shaped and dispatchable power to areas subject to PSPS and rolling blackouts. Whether this is practical in any given location depends on the physical conditions of the site as well as numerous regulatory matters. However, storage can also help to maintain reliability for the grid at large, which indirectly aids with local reliability. Batteries paired with solar and special switching equipment can also power resiliency centers during periods of no power. Customer-owned storage and solar is an effective way to tackle resiliency on a customer-by-customer basis and is discussed below in Section 5.6.

Equity- Battery storage can be built and located in disadvantaged communities helping with integration of more renewables and cleaner air. Storage development and installation can create local jobs and provide educational or training opportunities. Electric vehicles with battery storage can significantly improve local air quality and reduce total emissions and is discussed below in Section 5.6. Customer-owned storage (discussed in Section 5.6) can also provide cost savings on

time-of-use rates and resiliency to customers who are financially impacted the most by power outages.

4.5 Other Energy Storage

Lithium-ion batteries are being implemented widely, however they generally are only able to shift load within a single day, so no very long duration or seasonal load shifting can be achieved. SCP recognizes the potential need for longer duration and seasonal storage. Today, these technologies mainly consist of pumped hydroelectric, compressed air, power to gas (hydrogen), mechanical (or gravity) storage and thermal storage projects.

SCP has participated in a multi-CCA Request for Proposals (RFP) for long duration storage to be online by 2026. As of the drafting of this report, the responses were being evaluated. Because of the scale and economics of these projects, they are unlikely to be located in SCP territory, but the results of the evaluation will help inform commercial viability locally.

SCP anticipates the feasible energy storage projects for the Local Resource Plan to be batteries at least in the next two years, however, if any potential long duration or non-battery energy storage projects are brought to SCP, they will be assessed against the Evaluation Metrics established in Section 5.1.

4.6 Demand Management & Customer-Owned Resource Aggregation

Being able to manage the demand side usage and profiles is becoming increasingly more important when scaling a 24x7 hourly renewable portfolio.

Customer-sited resources and programs such as behind the meter solar, behind the meter storage, electric vehicles and chargers, electrification, and demand response of smart electric devices and behavior are important tools in shaping customer demand to supply.

The Local Resource Plan does not exist in isolation of other SCP plans and programs and works alongside the SCP Programs Strategic Action Plan on customer-side solutions (see plan at https://sonomacleanpower.org/uploads/documents/SCP-Programs-Strategic-Action-Plan-Jan.-2021-FINAL.pdf). Strategies and actions identified in the Programs Strategic Action Plan will be evaluated and potentially customized for EverGreen participation. Any customization of programs will be assessed against the Evaluation Metrics in Section 5.1.

5 Implementation Plan

In order to achieve a local renewable portfolio that matches the EverGreen hourly demand, promotes reliability, reduces emissions, aids local resiliency, and supports equity, SCP will utilize a multi-pronged approach to identify and construct new resources. This multi-pronged approach will include methods that serve to:

- 1) maintain or reduce EverGreen costs.
- 2) capitalize on unique and advanced projects,
- 3) canvas the market for unknown opportunities,

- 4) partner with local jurisdictions, public agencies, and/or schools for co-benefits,
- 5) use previously-developed land and rooftops for alternative revenue stream to local business and customers,
- 6) improve access to EverGreen for customers of low and moderate incomes, and
- 7) enhance distribution grid resiliency at cost-effective, beneficial locations.

In addition, SCP will continue to explore how customer-owned and sited resources could contribute to EverGreen resources in the near future.

This multi-pronged approach will consist of:

- Targeting grant-funded local projects
- Being open to specific opportunities/projects
- Issuing an RFP for utility-scale local renewables
- Issuing an RFI for rooftops and previously developed sites
- Working with existing feed-in-tariff projects to optimize delivery profile
- Customizing customer programs for EverGreen demand side resources and technology
- Targeting customer programs and projects for underserved customers and communities
- Exploring co-benefiting locations of local renewable supply with distribution grid resiliency

In addition, SCP's Local Resource Plan implementation will coordinate with community outreach and partnerships, supplement educational program support, and conduct ongoing research and development of emerging and advancing technologies.

5.1 Grant funded projects

SCP will monitor DOE, CEC, and other department grant opportunities that could apply to local renewable deployment.

5.2 Opportunistic projects (bilateral and public private partnerships)

SCP will remain open to meeting with developers that approach SCP with unique local projects that fit the EverGreen profile. SCP may enter into bilateral contracts with unique local projects that fit the needs and evaluation metrics for the EverGreen profile. SCP will first direct them to participate in any upcoming RFPs planned, however if there are no upcoming RFPs and SCP still needs the local energy, or the project is outside the scope of any RFP, SCP will remain open to such projects on a case-by-case basis.

5.3 Utility scale RFP

SCP plans to issue an all-encompassing RFP for local renewable and storage development with a goal of having contracts executed early in 2022. These projects are anticipated to be in excess of 1 MW and participate in the CAISO market. SCP is open to one large project or multiple smaller projects. Selected projects will be determined using the Evaluation Metrics discussed in Section 5.

The RFP will:

- solicit for any renewable resources (excluding bioenergy) and/or battery storage projects located in Sonoma or Mendocino counties,
- give preference for local developers and workforce if all other evaluation metrics are comparable,
- give preference for projects on previously developed land and rooftops, contaminated land or marginal land if all other metrics are comparable,
- require information from respondents regarding the impacts on and benefits for low-income and disadvantaged communities. This would include:
 - identifying the CalEnviroScreen score of the community in which the project will be built,
 - o whether it is an SB 535 Disadvantaged Community or AB 1550 Low-income community⁴,
 - o any increases or decreases in air pollution and other environmental or socioeconomic impacts due to the proposed project,
- require the respondent to provide information on employment and workforce development including:
 - identifying the number of new local jobs created during construction and operation phases,
 - employment and training/apprenticeship opportunities for individuals residing in low-income or disadvantaged communities or part of disadvantaged groups such as CARE/FERA customers, women, minorities, and disabled veterans.

5.4 Rooftop/Site RFI

SCP will issue an RFI for large commercial and municipal customers to utilize their sites. Once potential sites are identified, SCP will work with acceptable sites to potentially issue an RFP to developers to build projects on their sites. SCP will consider various options such as purchasing all of the energy from the site facility, purchasing a portion of the energy and leaving another portion for the site's energy needs, or leaving all of the energy for the site's needs and having control over the operating parameters of the storage component. SCP will evaluate projects on a case-by-case basis. In direct response to public feedback, SCP will work with the site owners and tenants to validate the projects are appropriately sized. SCP anticipates these projects to be less than 1 MW.

5.5 No Feed-in-tariff

The previous ProFIT program is closed and a standard feed-in-tariff is not included in this cycle of the Local Resource Plan. SCP wants to take all reasonable efforts to ensure that the projects that best fit SCP's needs at the least cost are selected. A standard power purchase cost and contract terms does not achieve this. SCP may revisit the potential for a feed-in-tariff in the 2023 Local Resource Plan cycle. This Plan relies instead on both broad solicitations and bilateral agreements.

⁴ See map here https://ww3.arb.ca.gov/cc/capandtrade/auctionproceeds/lowincomemapfull.htm

SCP will continue to work with existing ProFIT feed-in-tariff solar projects to examine potential for pairing battery storage at the existing sites.

5.6 Customer programs

SCP will continue working on customer programs that fit within the Programs Strategic Action Plan. SCP will begin to analyze customer programs in terms of EverGreen and will seek to optimize and identify opportunities throughout this 2-year Local Resource Plan Cycle.

While the specific opportunities for programs contributing to the EverGreen resource mix are still unclear and may require significant effort or regulatory changes, it could include:

- Shaping load by enrolling more EverGreen customers in demand response (GridSavvy) or converting existing GridSavvy customers to EverGreen
- Studying transportation electrification of buses and fleet vehicles in combination with EverGreen to provide 100% renewable transportation and using vehicle batteries as grid resources
- Evaluating the costs and benefits to the grid and GHG reduction of providing free or reduced-cost workplace charging during solar hours at EverGreen sites or for EverGreen customers
- Targeting fuel switching in buildings in combination with demand response and EverGreen enrollment
- Assessing the viability of providing vehicle-to-building resiliency in concert with EverGreen
- Targeting existing customers with solar for battery and car charging programs in combination with EverGreen
- Targeting battery storage deployment for EverGreen customers for permanent load shifting
- Assessing the viability of providing incentives for customers that switch to EverGreen
- Targeting low-income customers to provide energy savings from home upgrade programs and fuel savings from electric vehicles. Assess the ability to reduce their total electricity and gasoline expenditures while also being enrolled in EverGreen.

5.7 Underserved and low-income communities' projects

The Local Resource Plan will help implement the framework that will be established in the Programs Equity Framework. The Programs Equity Framework is currently being developed with the help of community involvement and input. One of the first steps SCP hopes to implement once the Programs Equity Framework is complete is to further engage with our low-income and disadvantaged communities in SCP territory. We plan to engage with leaders and active members of the communities to identify ways to better serve the community through the potential to invest in EverGreen projects.

SCP will explore how to promote rooftop solar and battery storage, home energy upgrades, and electric vehicles.

During this planning cycle, SCP will also begin to assess the viability of providing a discounted EverGreen service to CARE/FERA customers.

5.8 Resiliency and PSPS projects

SCP will immediately begin to investigate distribution network locations that would benefit from renewable resources and storage. These resources could serve as supply side resiliency sources during times of power outages as well as provide day-to-day local resources for EverGreen. SCP has already identified substations and feeders that are most impacted by PSPS events. SCP will focus on areas that experience PSPS at the transmission level or on feeder lines that are anticipated to be safe to remain energized during a PSPS event. SCP will continue to work with PG&E to identify cost effective solutions that provide socialized benefits to impacted customers during power outages.

On the customer side, SCP will continue working on customer programs that fit within the Programs Strategic Action Plan as related to resiliency. These could include all programs related to customer solar plus storage and vehicle-to-building technology.

5.9 Community Outreach and Partnerships

SCP is working on a comprehensive outreach and education program that aims to build stronger affiliations with local agencies, community benefit organizations and service providers, broaden education and outreach efforts, strengthen community trust, and improve SCP's engagement with customers. The program will establish a new set of pathways for community members and groups to propose ideas and partnerships, request support, and benefit from SCP's customer programs and other services. The Local Resource Plan will employ the strategies and goals within that program. The outreach program is expected to begin implementation by the end of 2021.

SCP also plans to utilize outreach and partnerships to increase EverGreen participation. A marketing plan specific to EverGreen will be created during the 2021-2022 Local Resource Plan cycle. Marketing plan strategies for increasing participation will be evaluated and could include:

- o A campaign to upgrade all municipal accounts to EverGreen
- Providing a referral incentive to EverGreen customers
- Developing targeted marketing and education to promote the switch to EverGreen.
- A campaign to improve CARE/FERA participation
- A campaign to enroll large commercial customers in EverGreen

5.10 Education

SCP will continue working on the Energy Education Program for Schools in SCP territory identified in the Programs Strategic Action Plan. SCP will work to incorporate EverGreen specific education into the current program.

The Local Resource Plan will also employ the educational strategies that will be identified in the comprehensive outreach and partnership program referenced in Section 6.9.

Because of the limited input from under-served and under-represented customers in this Local Resource Plan public workshop cycle, SCP does not feel there was adequate representation from all aspects of the SCP customer base. In the 2023 cycle, SCP will work to specifically identify and distribute public input opportunities to CARE/FERA customers and customers living within low-income or disadvantaged communities or part of underprivileged groups.

5.11 Ongoing Research & Development

While implementing the Local Resource Plan, SCP will collect information and complete analysis to promote the long-term development of local resources in Sonoma and Mendocino Counties. These activities may not influence the resources selected for EverGreen during this cycle but will provide additional flexibility and cost efficiency in future cycles of the plan. Specific tasks SCP has identified include:

- 1. Mapping supply congestion and congestion persistence to identify economically attractive areas for development of generation and storage.
- 2. Engaging developers to identify permitting, political, or logistical barriers to development.
- 3. Surveying local jurisdictions on permitting activity for energy-related projects.
- 4. Leveraging PG&E's public dataset on distribution capacity to identify areas with less interconnection issues.
- 5. Reviewing land use regulations, zoning, and conservation plans, to understand distribution of potential resource sites.
- 6. Monitor and actively engage vendors of new technologies including long duration storage, offshore wind, closed-loop geothermal, and vehicle-to-grid to explore applications within our territory.

6 Timeline and Summary

SCP will aim to fill the annual amount of energy needed using a combination of all implementation strategies. SCP will aim to procure resources to meet its objective of mitigating 110 metric tons of CO2 equivalent per GWh of load. This goal is approximately equivalent to taking 15 passenger cars off the road each year for every 100 average homes that join EverGreen. The exact resources and quantities will not be determined until each project/program has been assessed against the Local Resource Plan Evaluation Metrics and will be determined based on the most recent forecast EverGreen demand at the time of evaluating projects.

The Implementation timeline for the 2021-2022 Local Resource Plan cycle is outlined below.

Table 2: Local Resource Plan Implementation Timeline

	Implementation Strategy	Timeline
1	Monitor & identify potential grant funding opportunities for local projects	Ongoing
2	Bi-lateral and public private partnerships	Ongoing, however will direct any potential projects to any upcoming planned RFP or solicitation before considering
3	Issue utility scale RFP for local renewable and storage projects	Issue RFP within 30 days of Board approval of this plan and target executing first supply contract(s) in 2022.
4	Issue RFI for large commercial & municipal rooftop and previously developed sites	Issue RFI within 90 days of Board approval of this plan.
5	ProFIT battery storage	Within 90 days of Board approval of this plan, begin engaging with existing ProFIT project owners on possibility to add battery storage on existing sites.
6	Customer programs	Ongoing evaluation of opportunities for customer programs to contribute to EverGreen resources as part of SCP's ongoing Programs Strategic Action Plan process.
7	Identify programs and projects for low-income and disadvantaged communities	Within 90 days of Board approval of this plan, begin engaging with community leaders and citizens.
8	Analyze grid for PSPS solutions	Immediate and ongoing
9	Community outreach & partnerships	Ongoing in conjunction with SCP's comprehensive outreach and partnership program.
10	Education	By the end of 2021, begin engaging with Energy Education Program for Schools to provide customized curriculum for EverGreen. Target August 2022 to begin teaching additional EverGreen curriculum at schools.
11	Research & Development	Ongoing
12	Update forecast and re-instigate implementation strategies 2 and 3	For every 4 GWh increase in annual EverGreen energy from last RFP or solicitation.
13	2023-2024 Local resource planning cycle	Q4 2022 Restart public workshop process

SCP will use the following Evaluation Metrics to determine projects that best fit the Emissions Reduction, Resiliency, and Equity priorities for the Local Resource Plan.

- Local Availability
- Constructability
- GHG Emissions Mitigation
- Anticipated Cost
- Demand Matching/ Dispatchability
- Resilience/ Reliability
- Equity