BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Electric
Integrated Resource Planning and Related
Procurement Processes. 

Rulemaking 20-05-003
(Filed May 7, 2020)

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SONOMA CLEAN POWER AUTHORITY’S
FEBRUARY 1, 2023 INTEGRATED RESOURCE PLAN PROCUREMENT
COMPLIANCE FILING AND DATA REQUEST RESPONSE

[PUBLIC VERSION]

Brian Goldman
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February 1, 2023
SONOMA CLEAN POWER AUTHORITY’S
FEBRUARY 1, 2023 INTEGRATED RESOURCE PLAN PROCUREMENT COMPLIANCE FILING AND DATA REQUEST RESPONSE

[PUBLIC VERSION]

In compliance with the requirements of California Public Utilities Commission (Commission) Decision (D.) D.20-12-004 Ordering Paragraph (OP) 1 and D.21-06-035 OP 3, Sonoma Clean Power Authority (SCPA) hereby provides 2023 Integrated Resource Plan (IRP) Procurement Compliance Filing and Data Request Response (IRP Procurement Filing).

I. INTEGRATED RESOURCE PLAN PROCUREMENT COMPLIANCE FILING AND DATA REQUEST RESPONSE INCLUDED AS ATTACHMENTS TO THIS FILING

SCPA is e-filing this pleading in the instant Rulemaking and serving it to all parties identified in this Rulemaking’s service list via a Notice of Availability (NOA), which includes a Uniform Resource Locator (URL) link to this document along with a public version of SCPA’s 38 mmt Resource Data Template Version 3 (RDTv3) in Excel format. Attached to this pleading is SCPA’s public version of its 2023 IRP Procurement Filing, which includes SCPA’s verification, the public version of SCPA’s RDTv3, the public, version of SCPA’s Backstop Procurement Supporting Documentation, SCPA’s Long Lead-Time Resource Extension Request, and SCPA’s NOA. Confidential information is redacted in public versions of these documents.
II. CONCLUSION

SCPA thanks the Commission for its time and effort in this Rulemaking and for its review of SCPA’s 2022 IRP Procurement Filing.

Dated: February 1, 2023

Respectfully submitted,

/s/ Brian Goldman

Brian Goldman
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ATTACHMENT A
SONOMA CLEAN POWER
AUTHORITY VERIFICATION
VERIFICATION

I am the Director of Regulatory Affairs of Sonoma Clean Power Authority, and am authorized to make this verification on Sonoma Clean Power Authority’s behalf. I declare under penalty of perjury that the statement in the foregoing Sonoma Clean Power Authority February 1, 2023 Integrated Resource Plan Procurement Compliance Filing and Data Request Response to the California Public Utility Commission’s January 4, 2023 Integrated Resource Plan Data Request and all attachments thereto are true and accurate of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

Executed on February 1, 2023 at Santa Rosa, California.

_________________________
Neal Reardon
Director of Regulatory Affairs
For: Sonoma Clean Power Authority
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<td>raonly_CALPINE SUTTER IRP_tranche2</td>
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<tr>
<td>raonly_MUSTANG BESS_all</td>
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<td>energy_PROXIMA_EXPANSION</td>
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ATTACHMENT C

SONOMA CLEAN POWER AUTHORITY’S
LONG LEAD-TIME RESOURCE EXTENSION REQUEST
Sonoma Clean Power Authority’s  
Long Lead-Time Resource Extension Request

Pursuant to Ordering Paragraph 5 of Decision (“D.”) 21-06-035 and the January 4, 2023 Filing Requirements Overview for the February 1, 2023 Integrated Resource Plan (“IRP”) Compliance Filing & Data Request, Sonoma Clean Power Authority (“SCPA”) requests a compliance extension for 5.52 Megawatts (“MW”) (September Net Qualifying Capacity [“NQC”]) of its firm, zero-emitting generation capacity. SCPA executed contracts to meet its compliance obligation, but 5.52 MW (September NQC) of its firm, zero-emitting generation capacity may not reach commercial operation before the June 1, 2026 procurement deadline.

As part of its compliance filing, a load serving entity ("LSE") may request an extension by February 1, 2023 that extends the compliance deadline until June 1, 2028.\(^1\) An LSE can seek an extension if it shows “a good faith effort to procure these resources.”\(^2\) To demonstrate the good faith effort to procure Long Lead-Time ("LLT") resources to meet the June 1, 2026 procurement deadline directed in D.21-06-035, SCPA submits SCPA’s February 1, 2023 IRP Procurement Compliance Filing and Data Response, Attachment D, pages 400-1002, as evidence of the following for the capacity at risk of delayed commercial operation:

1. Evidence of a Solicitation
2. An Executed Contract
3. Site Control Documents\(^3\)

\(^1\) A request for extension of LLT resource procurement up to June 1, 2028 was authorized in Ordering Paragraph 5 of D.21-06-035.
\(^2\) D.21-06-035, p. 4.
\(^3\) D.21-06-035, p. 38.
D.21-06-035 set SCPA’s individual procurement minimum obligation for 2026 LLT resources at 25 MW (Mid-term Reliability [“MTR”] NQC).\textsuperscript{4} LLT procurement obligations include a requirement for long-duration storage as well as firm, zero-emitting generation resources. As a member of California Community Power (“CC Power”), SCPA participated in the October 25, 2021 firm clean energy resources request for offers, seeking up to 200 MW of firm clean energy resources with deliveries beginning no later than June 1, 2026, pursuant to D.21-06-035.\textsuperscript{5}

The portion of capacity that is at risk of delayed commercial operation was contracted as a portfolio of geothermal resources, where multiple projects are expected to contribute to Sonoma Clean Power Authority’s share of contracted capacity. Through regular communication with the counterparty, Sonoma Clean Power Authority has been notified that an estimated 5.52 MW (September NQC) of contracted geothermal capacity is likely to slip past the June 1, 2026 procurement deadline for LLT resources as a result of transmission upgrades. The projected commercial online date for this delayed geothermal capacity is currently 10/01/2027. Sonoma Clean Power Authority seeks extension until June 1, 2028 in case additional unforeseen delays occur, but Sonoma Clean Power Authority currently expects this capacity to reach commercial operation before this date.

The table below illustrates Sonoma Clean Power Authority’s potential LLT resource procurement delay among the requirements for the June 1, 2026 procurement deadline. Milestone documentation for Sonoma Clean Power Authority’s LLT resource obligation is

\textsuperscript{4} D.21-06-035, p. 56.
provided in the February 1, 2023 Integrated Resource Plan Procurement Compliance Filing and Data Request Response.

Table 1: Sonoma Clean Power Authority’s Progress Toward the 2026 Long Lead-Time Procurement Obligation

<table>
<thead>
<tr>
<th>2026 Long Lead-Time Resource Requirements</th>
<th>2026 Procurement Obligation (Sept NQC MW)</th>
<th>Contracted Capacity to Meet June 1, 2026 Deadline (MTR NQC MW)</th>
<th>Capacity at Risk of Delayed Commercial Operation (MTR NQC MW)</th>
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</thead>
<tbody>
<tr>
<td>Long-Duration Storage</td>
<td>12.5</td>
<td>14.4</td>
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<tr>
<td>Firm, Zero-Emitting Generation</td>
<td>12.5</td>
<td>8.9</td>
<td>5.52</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>25</strong></td>
<td><strong>23.3</strong></td>
<td><strong>5.52</strong></td>
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</tbody>
</table>

At this time, SCPA respectfully requests an extension of 5.52 MW (September NQC) of the LLT resource procurement obligation ordered in D.21-06-035 until June 1, 2028.
ATTACHMENT E
SONOMA CLEAN POWER AUTHORITY’S
NOTICE OF AVAILABILITY
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Electric
Integrated Resource Planning and Related
Procurement Processes.

Rulemaking 20-05-003
(Filed May 7, 2020)

SONOMA CLEAN POWER AUTHORITY’S NOTICE OF AVAILABILITY OF ITS
FEBRUARY 1, 2023 INTEGRATED RESOURCE PLAN PROCUREMENT
COMPLIANCE FILING AND DATA REQUEST RESPONSE
[PUBLIC VERSION]

Brian Goldman
Principal Compliance Analyst
Sonoma Clean Power Authority
431 E. St.
Santa Rosa, California 95404
Telephone: 707-856-8628

February 1, 2023
E-mail: bgoldman@sonomacleanpower.org
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Electric
Integrated Resource Planning and Related
Procurement Processes.  

Rulemaking 20-05-003  
(Filed May 7, 2020)

SONOMA CLEAN POWER AUTHORITY’S NOTICE OF AVAILABILITY OF ITS
FEBRUARY 1, 2023 INTEGRATED RESOURCE PLAN PROCUREMENT
COMPLIANCE FILING AND DATA REQUEST RESPONSE
[PUBLIC VERSION]

In accordance with the California Public Utility Commission’s (“Commission”) Rules
of Practice and Procedure, Rule 1.9(d), Sonoma Clean Power Authority (“SCPA”) hereby
provides the following Notice of Availability (“NOA”) of the below-listed public versions of
its February 1, 2023 Integrated Resource Plan Procurement Compliance Filing and Data
Request Response [Public Version] filing, which has been posted and are publicly available
on the SCPA’s website:

• SOMA_IRP_Procurement_public – SCPA’s Public version of its Integrated
  Resource Plan Procurement Compliance Filing and Data Request Response

• Soma_rdtv3_38mmt_public_v1 – SCPA’s public Excel version of its
  Resource Data Template Version 3

This document was posted at the following web address on or before February 1,
2023, and shall remain available at this address for the time period specified by the Rules of
Practice and Procedure:

https://www.sonomacleanpower.org/integrated-resource-plan
Please direct any questions or requests for copies of the above listed documents in other formats to:

Brian Goldman  
Principal Compliance Analyst  
707-856-8628  
bgoldman@sonomacleanpower.org

Dated: February 1, 2023

Respectfully submitted,

Brian Goldman  
Principal Compliance Analyst  
Sonoma Clean Power Authority  
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Santa Rosa, CA 95404  
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bgoldman@sonomacleanpower.org