

# **PUBLIC UTILITIES COMMISSION**

City and County of San Francisco

RESOLUTION NO. 26-0031

WHEREAS, The San Francisco Board of Supervisors established a Community Choice Aggregation (CCA) program in 2004 (Ordinance 86-04) and has implemented the program called CleanPowerSF, through the work of the San Francisco Public Utilities Commission (SFPUC) in consultation with the San Francisco Local Agency Formation Commission (Ordinances 146-07, and 232-09); and

WHEREAS, In Ordinance No 25-21, the Board authorized CleanPowerSF to enter into a joint powers agreement with nine other CCAs that provide electricity and related customer programs to customers in Northern and Central California, called California Community Power (CC Power); and

WHEREAS, In April 2021, CleanPowerSF became a member of CC Power; and

WHEREAS, On June 24, 2021, the California Public Utilities Commission (CPUC) ordered jurisdictional retail sellers of electricity, including CleanPowerSF, to procure 11,500 megawatts (MW) of new resources between 2023 and 2026, including 1,000 MW of Long-Duration Storage (LDS). CleanPowerSF's share of the CPUC's requirement is 15.5 MW. In February 2024, the CPUC extended the compliance deadline for Long-Duration Storage to 2031; and

WHEREAS, In 2022, CleanPowerSF participated in the Tumbleweed and Goal Line LDS Projects through CC Power to satisfy the CPUC procurement requirement; and

WHEREAS, The Goal Line agreements were terminated in 2025 due to a Seller Event of Default; and

WHEREAS, On August 19, 2024, CC Power issued a Request for Offers seeking bids from utility-scale renewable and storage assets, including those from LDS that could meet the CPUC's procurement order; and

WHEREAS, CC Power received and evaluated proposals from thirty LDS projects according to project economics, location, maturity and viability, and portfolio fit; and

WHEREAS, The Willow Rock LDS Project proposed by the developer Hydrostor was determined to provide significant benefits to participating CCAs, including portfolio diversity, Resource Adequacy capacity and regulatory compliance benefits; and

WHEREAS, On January 28, 2026, the CC Power Board of Directors approved the Willow Rock LDS Project and authorized the CC Power General Manager to execute the Willow Rock LDS Project agreements on behalf of CC Power; and

WHEREAS, CleanPowerSF seeks to purchase 11.5 MW of the Willow Rock LDS Project; and

WHEREAS, Along with the existing Tumbleweed Project, CleanPowerSF's share of the Willow Rock LDS Project will enable CleanPowerSF to meet its LDS procurement obligation as ordered by the CPUC; and

WHEREAS, The Willow Rock LDS Project requires three separate agreements, and CleanPowerSF is a party to two of those agreements; and

WHEREAS, The first of those agreements is the Energy Storage Agreement, which is an agreement between CC Power and GEM A-CAES, LLC (Willow Rock ESA); under the Willow Rock ESA, CC Power will purchase 50 MW of LDS on behalf of CleanPowerSF and the other participating members; the other participants are Peninsula Clean Energy, Redwood Coast Energy Authority, San José Clean Energy, Silicon Valley Clean Energy and Valley Clean Energy; and

WHEREAS, The second of those agreements is a Buyer Liability Pass-Through Agreement (BLPTA), which is an exhibit to the Willow Rock ESA; under the BLPTA, CleanPowerSF and the other participating CCAs must guarantee the prompt payment of their share of CC Power's obligations under the Willow Rock ESA should CC Power fail to make any required payments; and

WHEREAS, The third of those agreements is the Willow Rock LDS Project Participation Share Agreement (PPSA); the PPSA is an agreement between CC Power and the participating CCAs that defines the rights, duties, and obligations of CC Power and the Project participant; and

WHEREAS, Under the Willow Rock Long-Duration Storage ESA, CC Power has 120 days from CC Power Board approval to secure approval from each participating CCA's Governing Board; and

WHEREAS, On December 19, 2025, the California Energy Commission, acting as the California Environmental Quality Act (CEQA) lead agency, adopted a Final Decision for the Willow Rock Energy Storage Center (Project), and the Final Decision includes an environmental assessment, Findings of Fact, and a Compliance Monitoring Plan that are functionally equivalent to an Environmental Impact Report, CEQA findings, and a Mitigation Monitoring and Reporting Program, respectively, under the CEQA, per California Code of Regulations, Title 20, and Public Resources Code Section 21000, and the Final Decision also includes a Statement of Overriding Considerations; and

WHEREAS, The California Energy Commission has adopted the mitigation measures in the Compliance Monitoring Plan, which is included in the Final Decision to avoid or substantially lessen the significant environmental effects identified in the Final Decision and has assumed responsibility for their implementation; and

WHEREAS, The SFPUC is a Responsible Agency acting under the CEQA Guidelines Sections 15096 and 15381 because approval and execution of the Project Participation and Share Agreement and the Buyer Liability Pass-Through Agreement so that CleanPowerSF may participate in California Community Power's Long-Duration Storage procurement with the Willow Rock Energy Storage Center is a discretionary action subject to compliance with the CEQA; and

WHEREAS, The SFPUC has reviewed and considered the Final Decision and determined that approval of the Agreements is within the scope of the Final Decision, and that the Final Decision is adequate for these actions; and

WHEREAS, Staff has made the Final Decision, including the Findings of Fact, and Compliance Monitoring Plan, and Statement of Overriding Considerations adopted by the California Energy Commission that are part of the record of this approval available for review by this Commission and the public at the SFPUC offices, Environmental Management, 525 Golden Gate Avenue, 11th Floor, San Francisco, California, and those documents are part of the record before this Commission; and

WHEREAS, This Commission has reviewed and considered the information in the Final Decision, including the Findings of Fact, Compliance Monitoring Plan, and Statement of Overriding Considerations adopted by the California Energy Commission; and

WHEREAS, Since the California Energy Commission adopted the Final Decision, there have been no substantial changes in the Project or changes in Project circumstances that would result in new significant environmental effects or an increase in the severity of previously identified significant impacts, and there is no new information of substantial importance that would change the conclusions set forth in the Final Decision; and

WHEREAS, The SFPUC has no direct authority or responsibility with respect to the proposed Project or any Project mitigation measures other than through approval and execution of the Project Participation and Share Agreement and Buyer Liability Pass-Through Agreement to allow participation in the California Community Power's Willow Rock Long-Duration Storage Project procurement with the Willow Rock Energy Storage Center; now, therefore, be it,

RESOLVED, This Commission, acting as a Responsible Agency under the CEQA Guidelines Sections 15096 and 15381, has reviewed and considered the Final Decision and the record as a whole, finds that the Final Decision is adequate for its use as Responsible Agency for the Project and adopts the California Energy Commission's Findings of Fact and incorporates them by this reference as though set forth in this Resolution; and, be it,

FURTHER RESOLVED, This Commission affirms the determination that since the Final Decision was finalized, there have been no substantive Project changes and no substantial changes in Project circumstances that would require revisions to the Final Decision due to the potential involvement of new significant environmental effects or an increase in the severity of previously identified significant impacts, and there is no new information of substantial importance that would change the conclusions set forth in the Final Decision; and, be it,

FURTHER RESOLVED, That the Commission hereby approves and authorizes the General Manager to execute and seek Board of Supervisors approval for the Willow Rock Long-Duration PPSA and BLPTA for a not-to-exceed amount of \$75,900,000 over a twenty (20) year term on behalf of CleanPowerSF; and, be it,

FURTHER RESOLVED, That the Commission authorizes the General Manager to approve any modifications to the agreements that the General Manager determines, in consultation with the City Attorney, are in the best interest of the City, do not materially increase the obligations or diminish the benefits to the City, are necessary or advisable to effectuate the purposes and intent of this resolution, and are in compliance with all applicable laws, including the City Charter.

*I hereby certify that the foregoing resolution was adopted by the San Francisco Public Utilities Commission at its meeting of February 24, 2026.*



---

*Director of Commission Affairs  
San Francisco Public Utilities Commission*