

SAN FRANCISCO LOCAL AGENCY FORMATION COMMISSION

City Hall | 1 Dr. Carlton B. Goodlett Place, Room 409, San Francisco, CA 94102-4689

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Review of LAFCo Analysis of CleanPowerSF 2020 Integrated Resource Plan

July 15, 2022

LAFCo Analysis of CleanPowerSF 2020 IRP

- CPUC Requires IRPs every two years
- This memo summarizes LAFCo's comments on the 2020 IRP and CleanPowerSF's responses
- LAFCo's 2020 analysis benefited from the work of Vanir, its renewable energy consultant
- LAFCo should look for other subject matter experts to assist in reviewing the 2022 IRP

LAFCo IRP Comment and Response Documents

Date	Document
8/21/20	LAFCo and Vanir comments on IRP
9/10/20	Vanir Memo to LAFCo on IRP
10/8/20	CleanPowerSF written responses to LAFCo

LAFCo Categories of Comment

- Timeline
- Selected Portfolio
- Reliability and Resiliency
- Cost Analysis
- CleanPowerSF Programs

2020 IRP Compressed Public Comment Timeline

Date	Milestone
8/14/20	CleanPowerSF posted a summary of the IRP
8/18/20	CleanPowerSF posted the full IRP
8/21/20	Deadline for public comments
8/25/20	SFPUC approved the IRP
9/1/20	CleanPowerSF submitted the IRP to the CPUC
10/2/20	CleanPowerSF met with Vanir, LAFCo's renewable energy consultant, to review the IRP and LAFCo's comments
10/8/20	CleanPowerSF provided additional written responses to LAFCo

LAFCo Comments: IRP 2020 Timeline

- CPSF originally planned more time for comment
 - CPUC delays led to the compressed timeline
- LAFCo requested that the 2022 IRP process:
 - Initiate stakeholder engagement at least four months prior to CPUC submission deadline
 - Provide adequate time for public comment

CleanPowerSF 2022 IRP Timeline

- CPSF conducted initial community workshops in June, four months prior to submission deadline
- CPSF intends to provide four weeks for public comment
 - Anticipated to begin in late August or early September

LAFCo Comments: Selected Portfolio

- LAFCo and Vanir supported CPSF's the "Accelerated Case" as the preferred portfolio
- Vanir and CPSF clarified details on what percentage of proposed renewable energy resources would be local
- Vanir asked clarifying questions on PUC-owned properties that were included as planned sites of renewable projects

LAFCo Comments: Reliability and Resiliency

- Many public commenters supported preparations for Public Safety Power Shutoffs (PSPS) or other unplanned interruptions
- CPSF detailed their efforts on using battery storage for resiliency and described the policy choices involved
- CPSF stated they would develop a communication protocol if future PSPS impacts their energy supply systems

LAFCo Comments: Cost Analysis

- Vanir asked how the project costs and customer rates were determined and what subsidies were included in the IRP
- CPSF stated that they used the Levelized Cost of Energy (LCOE) for comparing project costs
- CleanPowerSF clarified that most projects in the IRP would not be eligible for the Self-Generation Incentive Program
- CleanPowerSF pointed to where the IRP described cost savings from use of the Investment Tax Credit (ITC)

LAFCo Comments: CleanPowerSF Programs

- Vanir asked for details on ratepayer programs targeting disadvantaged communities and hard-to-reach populations.
- CleanPowerSF pointed to the “Focus on Disadvantaged Communities” section of the IRP
- CleanPowerSF also stated that their Equity Working Group was developing an Equity Framework

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Questions?



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