

DOCKETED

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August 29, 2019

Ms. Lena Perkins
Department of Utilities
City of Palo Alto
250 Hamilton Avenue
Palo Alto, California 94301

Dear Ms. Perkins:

As required by Senate Bill 350 (SB 350) (de León, Chapter 547, Statutes of 2015) the California Energy Commission (CEC) has reviewed the *City of Palo Alto's 2018 Electric Integrated Resource Plan filing* (IRP) and standardized reporting tables, which were received on April 30, 2019. The CEC informed Palo Alto on June 18, 2019, that the IRP filing was complete, as required by Chapter 3, Section B.1 of the *Publicly Owned Utilities' Integrated Resource Plan Guidelines*.¹

Based on a detailed review and analysis of the City of Palo Alto's IRP, the standardized tables, and other supporting information, I have determined that the City of Palo Alto's 2018 Electric IRP is consistent with the requirements of PUC section 9621, and meets California's energy, climate, and other policy goals, including:

- Achieving greenhouse gas emission reduction targets commensurate with the electricity sector's percentage of economy wide reductions of 40 percent from 1990 levels by 2030.
- Meeting the renewables portfolio standard of 50 percent by 2030, based on SB 350.
- Ensuring planning goals related to retail rates, reliability, transmission and distribution systems, localized air pollution, and disadvantaged communities.
- Considering the role of renewable resources, grid efficiencies, energy storage, and distributed resources in meeting peak demand.
- Addressing procurement of energy efficiency and demand response, energy storage, transportation electrification, and portfolio diversification.

¹ See: <http://www.energy.ca.gov/sb350/IRPs/index.html>.

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The docketed staff paper, *Review of City of Palo Alto Utilities' 2018 Electric Integrated Resource Plan*, provides the details of the CEC's review and findings regarding the consistency of the City of Palo Alto Utilities IRP with PUC section 9621. The CEC anticipates considering adoption of this determination at a business meeting in December 2019.

If you have any questions regarding this determination, please contact Brian McCollough at Brian.McCollough@energy.ca.gov or (916) 653-1648.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'D' followed by a horizontal line that curves upwards at the end.

Drew Bohan
Executive Director

cc: Siva Gunda, Deputy Director, Energy Assessments Division