

DOCKETED	
Docket Number:	20-EPS-01
Project Title:	Emission Performance Standard
TN #:	233777
Document Title:	APPROVAL OF AN IMPERIAL IRRIGATION DISTRICT EMISSION PERFORMANCE STANDARD COMPLIANCE FILING
Description:	N/A
Filer:	Courtney Wagner
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	7/6/2020 1:27:57 PM
Docketed Date:	7/6/2020

Memorandum

To: Chair David Hochschild
Commissioner Karen Douglas
Commissioner Andrew McAllister
Commissioner Patty Monahan
Commissioner Janea A. Scott

Date: June 19, 2020

From: Drew Bohan
Executive Director

Subject: APPROVAL OF AN IMPERIAL IRRIGATION DISTRICT EMISSION PERFORMANCE STANDARD COMPLIANCE FILING

On May 28, 2020, the Imperial Irrigation District (IID) submitted a compliance filing requesting the California Energy Commission (CEC) find that IID's covered procurement for geothermal energy from the GeoGenCo Project #501 geothermal power plant (Plant) be determined to be compliant with the CEC Greenhouse Gases Emission Performance Standard (EPS), pursuant to Title 20 of the California Code of Regulations, §2900, et seq.

Senate Bill 1368 (Perata, Chapter 598, Statutes of 2006) limits long-term investments in baseload generation by the state's utilities to power plants that meet an EPS jointly established by the CEC and the California Public Utilities Commission. The CO₂ emission rate limit is 1,100 pounds per megawatt-hour. The EPS establishes a public process for determining the compliance of proposed utility investments. Utilities are required to submit a compliance filing upon committing to an investment that is required to meet the EPS.

On May 19, 2020, IID's Board of Directors approved a power purchase agreement (PPA) with GeoGenCo Project #501, LLC. for a term of 30 years. The PPA calls for a total capacity of at least 15 megawatts from the proposed Plant and a commercial operation date not earlier than June 15, 2022. The PPA requires the Plant to be certified by the CEC as renewable under the Renewable Portfolio Standard. Should the Plant fail certification, IID can terminate the PPA without penalty. The PPA further specifies the seller to warrant and guarantee the Plant will retain its RPS certification and compliance with EPS for the duration of the contract term.

Chair David Hochschild
Commissioner Karen Douglas
Commissioner Andrew McAllister
Commissioner Patty Monahan
Commissioner Janea A. Scott
June 19, 2020
Page Two

Staff has evaluated IID's compliance filing and concludes that the PPA is compliant with the EPS pursuant to §2903(b)(1); specifically, that the geothermal facility listed in the PPA meets the criteria of a renewable electricity generation facility as defined in Chapter 8.6 of Division 15 of the Public Resources Code and as such is determined to be compliant with the EPS. Staff recommends the CEC find that the covered procurement as described in IID's filing complies with the CEC's EPS, Title 20, §2900 et seq., of the California Code of Regulations.



Drew Bohan
Executive Director

June 19, 2020
Date