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Renewable Portfolio Standard Procurement Plan

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1. Executive Summary

In late 2018, Pasadena City Council (City Council) approved Pasadena Water and Power's (PWP) Renewable Portfolio Standard (RPS) Procurement Plan to comply with Senate Bill 100 (SB 100). SB 100 mandates a 60% RPS by 2030 and sets a planning target of 100% zero carbon resources by 2045.[1] The City Council also approved the Pasadena Climate Action Plan in 2018, which strives for a 52% reduction (compared to 1990) in citywide greenhouse gas (GHG) emissions associated with energy, transportation, water, and solid waste by 2035. In 2022, SB 1020 expanded the 100% zero-carbon by 2045 goal of SB 100 by adding interim targets to accelerate the adoption timeline. On January 30, 2023, the City Council adopted Resolution 9977, which declares a climate emergency in Pasadena and sets a policy goal to source 100% of Pasadena's electricity from carbon-free sources by 2030. This target is more ambitious than California and directs the City Manager to utilize the 2023 Integrated Resource Plan (IRP) process to plan multiple approaches to transition to the goal in a way that optimizes affordability, rate equity, stability, and reliability of electricity while achieving the goal.

This procurement plan is a guide to ensure compliance with SB 100, SB 1020, and other state requirements. PWP will endeavor to investigate and pursue achievement of Resolution 9977's goals in accordance with best utility practices as described below in Section 7, PWP's Renewable Portfolio Standard and Carbon-Free Strategy. The following are the primary changes in this revised RPS Procurement Plan:

- Annual renewable energy targets will reflect reasonable progress in the intervening years between RPS milestones and will be set at the greater of (i) the City of Pasadena's RPS goal or (ii) the State of California RPS goal of SB 100.
- Pursuant to SB 350 and the City of Pasadena's RPS Enforcement Program, PWP will incorporate the most recent RPS Procurement Plan into future iterations of the IRP.
- The following changes in Pasadena's contracted RPS resources are reflected in this RPS Procurement Plan:
  - Update to potential contracts, as presented in the 2023 IRP.
  - Given the number of variables and uncertainties related to actual resource performance and net retail load, it is difficult to precisely match the amount of renewable energy procured for each year to the RPS requirements. PWP's RPS portfolio optimization strategy to achieve the target RPS at the lowest cost to Pasadena customers includes the following:
    - To the extent available and consistent with Pasadena City Council goals, maximizing the use of lower cost categories (e.g., Portfolio Content Category (PCC) 2 and PCC 3), within resource balancing requirements, to meet the target RPS goals.
    - Limiting the amount of renewable energy and renewable energy credits (REC) that are actually retired in each PCC each year to the targeted amount. Any surplus is carried over to the following year(s) as long as the RECs can be retired within 36 months of generation.

[1] 60% of retail sales as explained below.

2. Disclaimer

This RPS Procurement Plan describes the intended strategy of PWP to comply with the RPS requirements of California SB X1-2, SB 350, SB 100, and the RPS Enforcement Program adopted by the Pasadena City Council on December 11, 2023. The RPS Enforcement Program and this RPS Procurement Plan incorporate the regulations established by the California Energy Commission (CEC) regarding Public Utilities Code Section 399.30 (l), as such interpretations of the law are codified in the California Code of Regulations, Title 20, Division 2, Chapter 13, Sections 3200 through 3208, and in Title 20, Division 2, Chapter 2, Article 4, Section 1240. This RPS Procurement Plan addresses not only California's state-wide RPS requirements but also the City of Pasadena's RPS goal, as affirmed in the 2015 IRP Update.

3. Portfolio Content Category Requirements

The CEC developed Enforcement Procedures for the RPS for local publicly-owned utilities (POU), which specify rules and procedures for compliance with the provisions of the California Public Utilities Code as modified by SB X1-2, SB 350, SB 100, and SB 1020. This Procurement Plan is consistent with the latest version of the CEC Enforcement Procedures and the City of Pasadena's RPS Enforcement Program. [2]

The following categories of renewable resources may be used to meet statutory RPS procurement targets (these categories are defined in the City of Pasadena RPS Enforcement Program and CEC Enforcement Procedures):

- Portfolio Content Category (PCC) 0
  - Resources procured prior to June 1, 2010
- PCC 1
  - Eligible renewable energy resource electricity that meets the requirement of in-state or out-of-state resources scheduling power directly to a California balancing authority in accordance with Public Utilities Code section 399.16(b)(1)
- PCC 2
  - Resources located outside a California balancing authority that may be delivered at times or locations other than when the energy is actually produced, in accordance with Public Utilities Code Section 399.16(b)(2)
- PCC 3
  - Eligible renewable energy resource electricity products or any fraction of the electricity generated, including unbundled RECs that do not qualify under the criteria of PCC 1 or PCC 2, in accordance with Public Utilities Code Section 399.16(b)(3)

[2] CEC: "Enforcement Procedures For The Renewables Portfolio Standard For Local Publicly Owned Electric Utilities," Amended Regulations, Title 20, Division 2, Chapter 13, Sections 3200 – 3208, Title 20, Division 2, Chapter 2, Article 4, Section 1240; Effective April 2016 - CEC-300-2016-002-CMF; and Pre-Rulemaking Amendments to the Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utility (Sections 3200 through 3208)

The Net Procurement Requirement is the total RPS requirement minus the grandfathered PCC 0 resources, which count in full. PWP assigns eligible renewable energy resource electricity products to the appropriate PCC consistent with Section A.3 of the City of Pasadena RPS Enforcement Program and the CEC Enforcement Procedures, Section 3203.

Under the CEC's Enforcement Procedures, all local POUs must show an increasing annual renewable energy procurement to demonstrate reasonable progress toward reaching the mandated 60% by calendar year 2030. PWP must procure a minimum quantity of electricity products from eligible renewable energy resources, including RECs, as a specified percentage of retail sales. Retail sales are defined in the RPS Enforcement Program as sales of electricity by a POU to end-use customers and their tenants, measured in MWh minus energy consumption by a POU, electricity used by a POU for water pumping, or electricity produced for onsite consumption (self-generation). Annually, PWP uses approximately 16 GWh (or about 1.6% of total load) of electricity for water pumping.[3] SB 350 further clarifies that retail sales may exclude sales to customers taking service under the optional Green Power Option or any shared renewable generation program to achieve the following RPS targets.

Error! Reference source not found.1 summarizes the renewable energy procurement requirements under the CEC Enforcement Procedures, Pasadena's RPS Enforcement Program, and the potential requirements under SB 100 (the SB 100 requirements are estimates, as the CEC Enforcement Procedures have not been updated for SB 100 compliance).

Figure 1: Renewable Resource Categories and State Renewable Portfolio Standard Requirements

<table>
<tr><th colspan="7">PWP CEC-Compliant RPS Procurement Plan Requirements by Calendar Year</th></tr>
<tr><th>Requirement</th><th colspan="2">Compliance Period 3</th><th>Compliance Period 4</th><th>Compliance Period 5</th><th>Compliance Period 6</th><th>Compliance Period 7</th></tr>
<tr><td rowspan="5">California RPS Mandatory Procurement Requirement (% of Net Retail Sales)[4, 5]</td><td>Year</td><td>%</td><td rowspan="5">44% by December 31, 2024</td><td rowspan="5">52% by December 31, 2027</td><td rowspan="5">60% by December 31, 2030</td><td rowspan="5">2031+ (3 year blocks) 60%</td></tr>
<tr><td>2017</td><td>27%</td></tr>
<tr><td>2018</td><td>29%</td></tr>
<tr><td>2019</td><td>31%</td></tr>
<tr><td>2020</td><td>33%</td></tr>
<tr><td>PCC 1 Minimum</td><td colspan="6">≥75% of Net Procurement Requirement</td></tr>
<tr><td>PCC 2 Maximum[6]</td><td colspan="6">≤15% of Net Procurement Requirement</td></tr>
<tr><td>PCC 3 Maximum</td><td colspan="6">≤10% of Net Procurement Requirement</td></tr>
<tr><td>Long-Term Contracts (at least 10 years duration)</td><td colspan="2">N/A</td><td colspan="4">At least 65% of contracts must be long-term contracts (at least 10 years in duration)</td></tr>
</table>

[3] 1 GWh = one Gigawatt hour = one million kilowatt hours.

[4] As specified in the CEC Guidebook and CEC Enforcement Procedures.

[5] Net Retail Sales is defined as Total Retail Sales minus Department usage including Water Department pumping load.

[6] The PCC 2 constraint is not specified by law but is derived logically as the maximum residual given the PCC 1 and PCC 3 constraints.

For a customer participating in the Green Power Option or any shared renewable generation project, the RECs associated with electricity credited to such customer under the program will not be used by PWP for compliance with state mandated RPS procurement requirements. The RECs will be retired on behalf of the participating customer and may not be further sold, transferred, or otherwise monetized for any purpose. Under these programs, PWP will seek to procure generation from eligible renewable energy resources that are located in reasonable proximity to participants to the extent possible.[7]

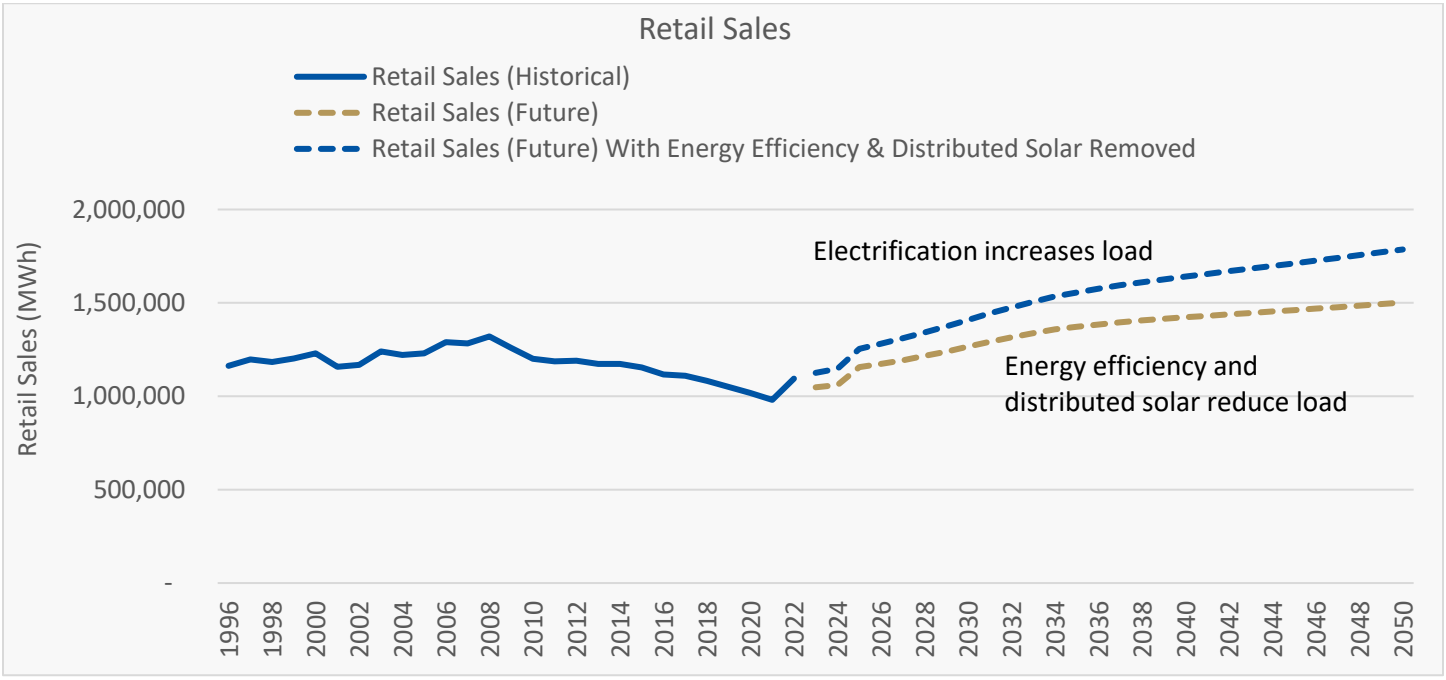
Details of the above requirements can be found in the CEC's Enforcement Procedures for Local Publicly Owned Utilities and Pre-Rulemaking Amendments to the Enforcement Procedures.

4. Renewable Portfolio Standard Procurement Plan

4.1. Supply vs. Load

This Procurement Plan is consistent with the renewable energy procurement guidelines recommended by the 2023 IRP. The PWP 2023 IRP was designed to strike a balance between environmental regulatory compliance and system reliability while maintaining stable and affordable retail electric rates. It also complies with the requirements of SB 350, SB 100, and SB 1020. The 2023 IRP projects that PWP's retail sales will increase due to increased electrification efforts. The gap between the gross and net forecast is due to demand response, energy efficiency, and distributed generation. This trend is shown in **Error! Reference source not found.**2.

Figure 2: 2023 Integrated Resource Plan Updated Load Projection



[7] PUC Section 399.30(c)(4)

Though the SB 100 mandates require POUs to procure 60% of their retail needs through renewable power by 2030, PWP must strike a balance of meeting this need while being mindful of its cost, reliability, and sustainability obligations and priorities. Over or under procuring renewable energy in comparison to requirements come with risks and opportunities.

Private use restrictions on generation projects financed with municipal bonds, and on the sale of power from the federally-owned and operated Hoover power project, generally require that these projects be dedicated to serving PWP's load and not resold. IPP is expected to be repowered with a smaller natural gas-fired project in 2025. Much of the shortfall in capacity and energy after that date is planned to be fulfilled with renewable or zero-carbon energy resources. To mitigate a variety of risks, PWP will seek to ensure an appropriate mix of various RPS and other products as part of a diversified power supply portfolio.

5. Compliance Strategy

PWP starts with a projected load forecast based on actual historical loads, assuming load growth for planned projects and electrification, offset by expected distributed generation, demand side-management and projected energy efficiency savings. PWP's RPS procurement requirement is calculated by multiplying the load forecast for each year (in GWh) by the required annual RPS percentage for that year to come up with the amount of renewable energy (in GWh) required by year (the annual RPS Total Procurement Requirement). [8]

Next, PWP subtracts the amount of energy that is expected to be delivered from the existing resources. First, the existing, grandfathered contracts in PCC 0 are subtracted from load. The resulting number is the RPS Net Procurement Requirement. Next, PWP subtracts the amount of energy that is expected to be delivered from the existing resources procured by PWP by PCC and Compliance Period.

In meeting the RPS procurement requirements identified in this RPS Procurement Plan, PWP is required to meet the long-term contract requirements per Public Resources Code § 399.13(b). Beginning January 1, 2021, a minimum of 65% of PWP's RPS resource procurement shall be from its contracts that have terms of 10 years or more or in its ownership or ownership agreements for eligible renewable energy resources.

6. Balanced Portfolio

After determining the amount of energy already procured in each year, each PCC, and each Compliance Period, PWP must determine the amount of RPS procurement still required. This requires a calculation of the RPS procurement constraints and a comparison of annual energy procurement against these constraints to determine if future compliance targets (or obligations) will require additional purchases of PCCs. The final calculation is the net short evaluation. If the sum of existing contracts is less than the total required RPS Net Procurement Requirement energy for the year, the difference is the amount that must be procured, and allocated to the PCCs according to the constraints. Any surplus renewable energy and/or credits in a year may be carried over into the following year, and the RPS Net Procurement Requirement adjusted accordingly.

[8] 1 GWh = one Gigawatt hour = one million kilowatt hour (kWh)

In addition to balancing between PCCs and compliance periods, PWP must consider the right mix of resources to fit PWP's portfolio and load as it evaluates RPS proposals. PWP evaluates its existing RPS portfolio and remaining future needs to develop a diverse portfolio of different technology types (e.g., wind, solar, geothermal). Further, PWP evaluates the right mix of contract durations to meet the long-term contract requirements and balancing ongoing needs with short term opportunities. Additionally, PWP expects to contract with a diversified set of counterparties, which in the procurement process are evaluated for deliverability and performance risk to mitigate risk of delays and project failure. PWP also factors in aspects of geographic diversity to further mitigate deliverability risk.

7. PWP's Renewable Portfolio Standard and Carbon-Free Strategy

Above and beyond the mandatory RPS procurement requirements under SB 350 and SB 100, PWP's target of 100% carbon-free resources by 2030, a policy goal set by City Council, requires the additional procurement of carbon-free resources. Additional procurement will occur as PWP is able to secure resources beyond meeting regulatory requirements and replacing Intermountain Power Plant with carbon-free resources by 2027, while balancing cost and other considerations.

In all scenarios, a significant amount of wind, solar, storage, and fuel cells are added by 2031. Scenarios 1-3, which all meet 100% carbon-free by the end of 2030, require 700 – 1,300 MW of new installed capacity over the next eight years (see Figure 3). Compared to PWP's current resources of around 400 MW, this is a transformational amount of resources. In case a particular resource type is unobtainable according to the timeline, and in the quantity specified below, PWP could exercise alternative resources to make up the shortfall. Throughout this initial period through 2031, PWP will carefully monitor the procurement progress and recommend adjustments as new information or technology emerges.

Successfully procuring this level of new capacity will require a coordinated effort in order to source projects, conduct due diligence, perform evaluations, negotiate contracts, secure approval, sign contracts, and ultimately see projects through to their commercial operations date. There will be continual Requests for Proposals for the carbon-free resources that will help shape the optimal mix of resources in PWP's Power Supply at best fit and least cost portfolio.

Figure 3: Cumulative New Resource Installed Capacity Through 2031 (MW)

	Solar	Wind	Battery Storage	Fuel Cell	Geothermal	Scenario Total
Scenario 1	300		285	115		700
Scenario 2	615	30	665	35	10	1,355
Scenario 3	480	60	598	35	20	1,193
Scenario 4	5	250	130			385
Scenario 5	5	610	60			675

8. PWP's Renewable Portfolio Standard Procurement Process

Because PWP is a relatively small municipal utility, it solicits most of its long-term renewable resources through open requests for proposals (RFP) conducted by its joint powers authority SCPPA (Southern California Public Power Authority).[9] This allows PWP and other SCPPA members to purchase the output of portions of multiple diverse projects and gain economies of scale, rather than limit the projects that they would be capable of participating in due to the comparatively small demand of most of the individual utilities. PWP anticipates dividing its outstanding RPS procurement between different resource technologies and seeking some long-term and mid-term contract terms. In this case, PWP defines long-term as ten years or longer, and mid-term as five to ten years. PWP may procure some RECs and/or PCC 2 products with shorter tenures. PWP will also seek products with energy pricing tied to electricity market indices as well as fixed priced.

The SCPPA RFPs are considered an open and "rolling" solicitation, generally issued in January, with responses accepted through December each year. The SCPPA RFP solicits proposals for power purchase agreements with and without ownership options and also invites energy storage and innovative proposals. PWP initially screens prospective renewable resource proposals received through SCPPA and through direct contact with renewable project developers based on the levelized offer price ($/MWh or $/kW-month) for resources with a project size and proposed delivery period that matches PWP's procurement targets. For larger projects, joint participation with other SCPPA members may be desirable to obtain the best project economics and contract terms.

8.1. Quantitative Analysis

From the short-list of projects that pass the initial screening, PWP evaluates and compares proposals to identify the "least cost/best fit" opportunities. Best fit analysis considers PWP's projected needs in light of its existing portfolio of generating resources and contracts. For example, considerations include: RPS targets and other regulatory requirements, grid and local area reliability needs, projected load and generation profiles, the estimated commercial operation or contract start date, and proposed contract term (duration). Variables can include the following:

- Generation cost
- Risk analysis of time-of-delivery value under various market price scenarios
- Capacity value
- Congestion hedge value at the point of delivery
- Ancillary service value [10]
- Value of environmental attributes by PCC
- Costs of integrating variable generation technologies

[9] SCPPA = Southern California Public Power Authority, which includes the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles Dept. of Water & Power, Pasadena, Riverside, Vernon, and the Imperial Irrigation District.

[10] Ancillary Services are required to support the transmission of energy from generation resources to loads while maintaining reliable operation of the electric grid in accordance with regional reliability standards and good utility practice. Ancillary Services include Regulation, Spinning Reserve, Non-Spinning Reserve, Voltage Support and Black Start, each as defined in the CAISO Tariff.

- Incremental transmission costs excluding current CAISO load- based transmission access and grid management charges
- Costs and deliverability status associated with CAISO load- based transmission access and grid management charges

8.2. Qualitative Analysis

In addition to the quantitative evaluation, PWP performs a qualitative evaluation using a process similar to that employed by California investor-owned utilities to rate project viability. Project viability can refer to the following:

- Project owner/development team experience developing, owning, operating and/or maintaining similar projects and technical feasibility
  - The proposed resource must be a commercialized technology in use at other operating facilities of similar or larger capacity
  - Must meet the California Emission Performance Standard
  - Must be pre-certified by the CEC as an eligible renewable resource
  - The proposal must include high quality resource production profile estimates
  - There should not be any known or anticipated manufacturing supply chain constraints
  - Identified available water source and minimal water consumption
- Development milestones
  - Site control
  - Permitting
  - Status of and ability to obtain financing
  - Interconnection progress
  - Transmission system and deliverability upgrade requirements/schedule
  - Reasonableness of proposed commercial operation or contract start date

In addition to project viability, PWP's qualitative evaluation also considers the following factors:

- Risk exposure diversification
- Counterparty creditworthiness and willingness to post collateral
- Resource flexibility and optionality
- California's Energy Action Plan preferred loading order
- Preference for previously disturbed and brownfield sites, or locations in designated Renewable Energy Zones
- Local and certified small or micro business preference

9. Summary of Renewable Portfolio Standard Procurement Plan

PWP's 2023 RPS Procurement Plan for meeting the RPS goals is outlined in, with the appropriate PCC and RPS targets required under the CEC Enforcement Procedures. To optimize the portfolio and minimize costs, this Procurement Plan assumes PWP retires only the amount of RECs required in each PCC in any particular year and carries over the remainder

into future periods. The pending contracts listed in Figure 4 refer to planned future contracts to meet compliance requirements. The 2023 RPS Procurement Plan is an estimate only to show PWP's intent to comply with SB 100.

When reviewing the 2023 RPS Procurement Plan, it is important to note the following:

- CP refers to Compliance Period
- CP 4, CP 5, and CP 6 are based on PWP estimates
- TBD is to be determined based on contract negotiations and the 2018 IRP Update
- Planned refers to projects that are under negotiation, or plan to be under negotiation in that CP

Figure 4: PWP SB 100 Procurement Plan from 2023 IRP

	2023 – 2024 (Partial Compliance Period 4)[11]	Compliance Period 5	Compliance Period 6
Calendar Year (CY)	2021 - 2024	2025 - 2027	2028 - 2030
Estimated PWP Adjusted Projected Retail Sales (MWh)	2,064,129	3,417,985	3,579,142
Estimated Requirement Procurement for CP (MWh)	879,914	1,687,019	2,053,186

Grandfathered Projects							
Resource	**Resource Type**	**Location**	**Online Year**	**PCC**	**Partial Compliance Period 4 (GWh)**	**Compliance Period 5 (GWh)**	**Compliance Period 6 (GWh)**
Biofuels: Chiquita Landfill	Biofuels	CA	2010	PCC0	75,002	106,606	97,569
Wind: PPM (Avangrid) Wind	Wind	CA	2003	PCC0	5,648	-	-
Wind: Milford Wind	Wind	UT	2009	PCC0	19,055	28,754	17,996
Total Grandfathered Owned or Contracted Projects					**99,705**	**135,360**	**115,566**

Non-Grandfathered Owned or Contracted Projects							
Resource	**Resource Type**	**Location**	**Online Year**	**PCC**	**Partial Compliance Period 4 (GWh)**	**Compliance Period 5 (GWh)**	**Compliance Period 6 (GWh)**
Biofuels: Puente Hills Landfill	Biofuels	CA	2014	PCC1	59,790	89,527	89,142
Solar PV: Antelope Solar	Solar PV	CA	2012	PCC1	30,823	46,116	44,725

[11] Compliance shown for 2023 – 2024.

Non-Grandfathered Owned or Contracted Projects							
Resource	**Resource Type**	**Location**	**Online Year**	**PCC**	**Partial Compliance Period 4 (GWh)**	**Compliance Period 5 (GWh)**	**Compliance Period 6 (GWh)**
Solar PV: Kingbird Solar	Solar PV	CA	2013	PCC1	114,972	172,485	167,340
Solar PV: Columbia Two Solar	Solar PV	CA	2013	PCC1	14,672	21,991	21,320
Solar PV: Summer Solar	Solar PV	CA	2012	PCC1	30,825	46,119	44,727
Solar PV: Windsor Reservoir Solar	Solar PV	CA	2010	PCC1	2,639	3,962	3,828
Geothermal: Coso Geothermal	Geothermal	CA	2027	PCC1	-	72,375	214,730
Geothermal: Calpine Geysers	Geothermal	CA	2027	PCC1	-	194,910	578,280
Solar PV: EDF Sapphire Solar	Solar PV	CA	2027	PCC1	0	110743	321581
Total Non-Grandfathered Owned or Contracted Projects					**253,722**	**758,228**	**1,485,675**

Non-Grandfathered Generic Projects (Scenario 4)							
Resource	**Resource Type**	**Location**	**Online Year**	**PCC**	**Compliance Period 4 (GWh)**	**Compliance Period 5 (GWh)**	**Compliance Period 6 (GWh)**
Wind: New Land-Based External Wind	Wind	WECC Region	TBD (250 MW in 2025)	PCC1	-	2,302,196	2,255,532
Wind: New Land-Based External Wind (Storage Paired)	Wind	WECC Region		PCC1	-	-	-
Solar PV: New External Solar	Solar PV	WECC Region		PCC1	-	-	-
Solar PV: New External Solar (Storage Paired)	Solar PV	WECC Region		PCC1	-	-	-
Solar PV: New Internal Solar	Solar PV	WECC Region		PCC1	-	-	-

Non-Grandfathered Generic Projects (Scenario 4)							
Resource	**Resource Type**	**Location**	**Online Year**	**PCC**	**Compliance Period 4 (GWh)**	**Compliance Period 5 (GWh)**	**Compliance Period 6 (GWh)**
Solar PV: New Community Solar	Solar PV	WECC Region	TBD (5 MW in 2025)	PCC1	-	42,692	41,298
Solar PV: New Internal Solar (Storage Paired)	Solar PV	WECC Region		PCC1	-	-	-
Solar PV: New Commercial Solar	Solar PV	WECC Region		PCC1	-	-	-
Solar PV: New Residential Solar	Solar PV	WECC Region		PCC1	-	-	-
Geothermal: New External Geothermal	Geothermal	WECC Region		PCC1	-	-	-
Biofuels: New External Fuel Cells	Biofuels	WECC Region		PCC1	-	-	-
Biofuels: New Internal Fuel Cells	Biofuels	WECC Region		PCC1	-	-	-
Wind: New Offshore Wind	Wind	WECC Region		PCC1	-	-	-
Total Non-Grandfathered Owned or Contracted Projects					-	**2,344,889**	**2,296,829**

10. Renewable Portfolio Standard Procurement Plan Limitations and Relief

Section E of the City's RPS Enforcement Program notes that PWP will use its best efforts to procure adequate supplies of renewable energy as set forth in this RPS Procurement Plan; however, PWP will at all times maintain system reliability and average procurement costs for retail electric sales in accordance with the approved budget and retail electric rates approved by the City Council. California law recognizes that adverse situations beyond PWP's control may arise and prevent PWP from fulfilling the RPS Procurement Targets in a timely manner and consistent with such limitations.

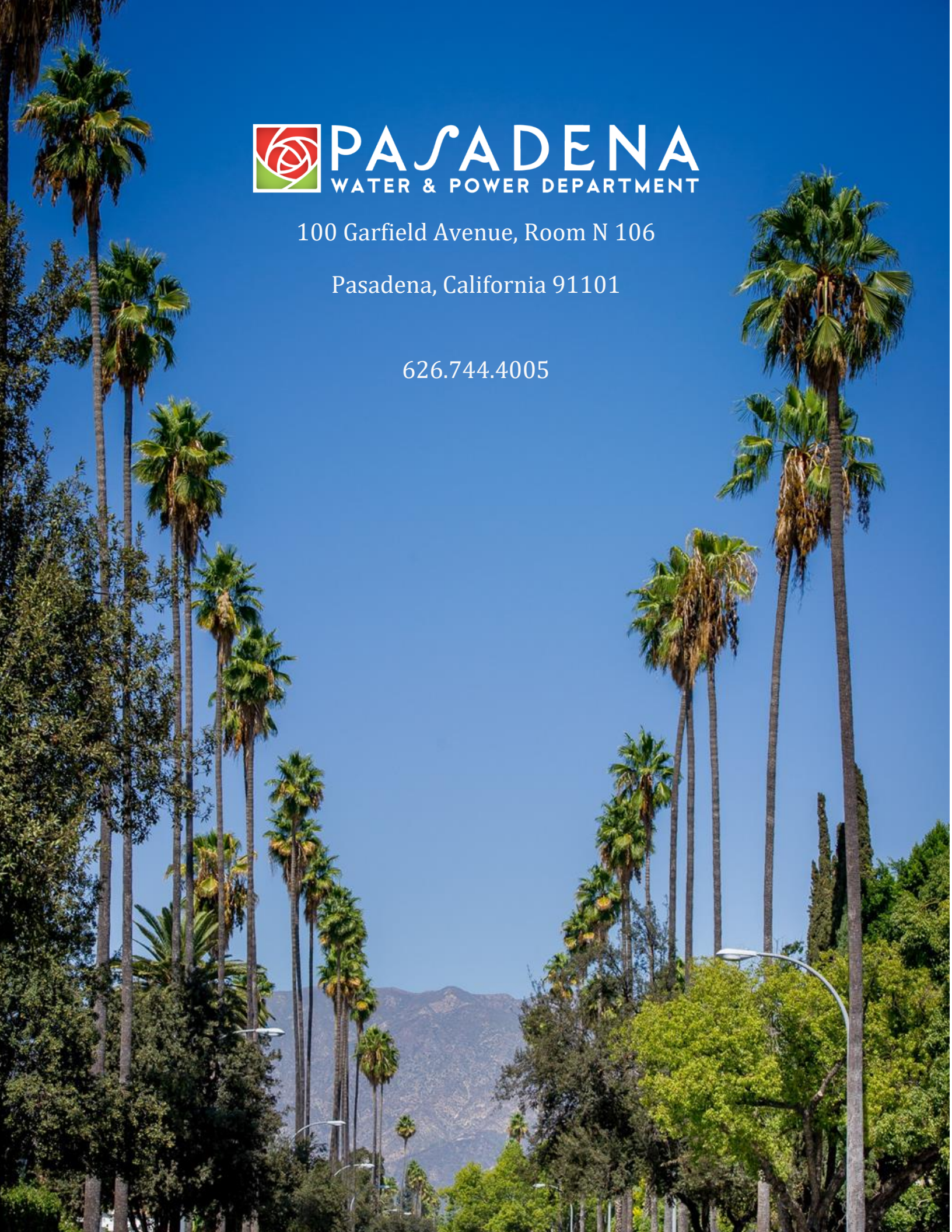
In the event PWP discovers that such conditions, as specified in the City of Pasadena's RPS Enforcement Program, may potentially prevent PWP from meeting the RPS Procurement Targets set forth in the RPS Enforcement Program, PWP will notify the City Council of the adverse conditions and apply to the CEC for relief. If appropriate, PWP may submit a revised RPS Procurement Plan for discussion, approval, and implementation.

The CEC may reduce a procurement requirement to the extent PWP demonstrates that it cannot comply because of conditions beyond its control.[12] However, the CEC may not, under any circumstance, reduce the procurement obligation of PCC 1 below 65% for any compliance period obligation after December 31, 2016. PWP expects to fully comply with the City of Pasadena's and the State of California's mandatory RPS requirements. PWP does not recommend taking advantage of this provision or other optional compliance measures detailed in the City of Pasadena's RPS Enforcement Program at this time.

11. Version History

- Version 1: Initially adopted July 22, 2013
  - New mandate to comply with SBX1 2
- Version 2: Amended June 1, 2015
  - Include updates on contracts and other processes
- Version 3: Amended January 29, 2018
  - Show compliance with SB 350
  - Include updates on contracts and other processes
- Version 4: Amended December 10, 2018
  - Show compliance with SB 100
  - Include updates on contracts and other processes, as recommended by the 2018 IRP
- Version 5: Amended December 11, 2023
  - Show compliance with SB 100
  - Include updates on contracts and other processes, as recommended by the 2023 IRP

[12] PUC Section 399.15(5)



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