

**DOCKETED**

<b>Docket Number:</b>	16-RPS-03
<b>Project Title:</b>	Amendments to Regulations Specifying Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities
<b>TN #:</b>	229211
<b>Document Title:</b>	Roseville Electric Utility Original Letter Regarding Notification of Intent to Act
<b>Description:</b>	Notification of Intent to Act Pursuant to Authorization Granted by California Utilities Code Section 399.33.
<b>Filer:</b>	Chris Metzker
<b>Organization:</b>	Roseville Electric Utility
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	8/5/2019 12:39:01 PM
<b>Docketed Date:</b>	8/5/2019



**Roseville Electric**  
2090 Hilltop Circle  
Roseville, California 95747-9704  
*Reliable Energy. Dependable Service.*

March 5, 2019

Mr. Drew Bohan  
Executive Director  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**SUBJECT: Notification of Intent to Act Pursuant to Authorization Granted by California Public Utilities Code Section 399.33**

Dear Mr. Bohan:

As you are aware, Senate Bill 100 (Statutes of 2018) increased the State's Renewables Portfolio Standard (RPS), setting a goal of 60% of a utility's power generation coming from RPS-eligible resources by 2030. The State's increasing RPS requirements are shifting utilities to a lower carbon resource mix. Roseville Electric Utility is supportive of this change, but also places a high value on maintaining affordable energy costs for our customers. It is with this lens, and pursuant to Senate Bill 1110 (Statutes of 2018) as codified in Section 399.33 of the California Public Utilities Code (PUC §399.33), that I write to notify you in advance of the April 1, 2019, statutory deadline, that Roseville Electric Utility intends to act pursuant to the authorization granted by the aforementioned section.

Roseville Electric Utility owns and operates the Roseville Energy Park, a 160 MW power plant located in Roseville, California. This power plant was built after January 1, 2000, and the utility originally secured public bond financing for the project in 2005. As the State's RPS requirements increase and given the remaining bond debt on this power plant, it is plausible that the utility may find itself in a scenario where the plant is operating at a capacity factor below 20% on an annual average in a given year. This could affect the utility's ability to cover its bonded indebtedness for the plant, and may ultimately result in the loss of employment of a power plant employee(s) who receive a prevailing wage.

The Roseville Energy Park is in compliance with the Commission's Emissions Performance Standard and is not located within a disadvantaged community as that term is defined in PUC §399.33(a)(4). The plant has been integral to reliably serving Roseville Electric Utility's load and has not been repowered.

Acknowledging the current construct of the RPS Program, we are in the process of updating our RPS Procurement Plan to incorporate provisions that would facilitate use of the RPS procurement target adjustment described in PUC §399.33(b), among other updates needed to accommodate recent legislative changes. As required by statute, we will provide Commission staff with our updated Procurement Plan once it has been adopted by our governing board.


Should Roseville Electric Utility need to implement the adjustments described in PUC §399.33(b) in future compliance periods, we will provide the requisite notifications to the Commission in our annual compliance reports submitted to the Renewable Energy Office by July 1 of each year. If such action is needed, we look

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forward to working with Commission staff to ensure that we have provided sufficient supporting documentation to demonstrate that our utility is implementing this provision in a transparent manner.

Please confirm your receipt of this letter by sending an email to Amber Blixt, Government Relations Supervisor at [AABlixt@roseville.ca.us](mailto:AABlixt@roseville.ca.us). If you have any questions or would like additional information, Amber Blixt can be reached at the email noted above or by phone at (916)774-5693.

Sincerely,



Michelle Bertolino  
Director, Roseville Electric Utility

Attachments: Senate Bill 1110 (Chapter 605, Statutes of 2018)

Cc: Barry Steinhart, Assistant Executive Director, Office of Government Affairs, California Energy Commission  
Natalie Lee, Deputy Director, Renewable Energy Division, California Energy Commission  
Michael Sokol, Office Manager, Renewable Energy Office, California Energy Commission