

**From:** Jim Woodward  
**To:** Docket Optical System  
**CC:** David Vidaver; Sylvia Bender  
**Date:** 3/2/2009 4:59 PM  
**Subject:** 09-IEP-1B San Francisco Resource Adequacy data submittal  
**Attachments:** CEC 2009 Small POU Supply Form Final 022609.xls; CEC Small POU Final.doc

<b>DOCKET</b>	
<b>09-IEP-1B</b>	
<b>DATE</b>	<u>MAR 02 2009</u>
<b>RECD.</b>	<u>MAR 02 2009</u>

Dockets:

Please docket this transmittal email regarding electricity resource plan data submitted today by the City and County of San Francisco (CCSF), in partial compliance with our data request in support of the 2009 IEPR. This is a first time resource adequacy filing from CCSF.

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>>> "Hendry, James" <[JHendry@sfwater.org](mailto:JHendry@sfwater.org)> 3/2/2009 4:07 PM >>>

Original Subject line: CCSF Small POU Response to IEPR Data Request

Jim - Attached is CCSF's response to your request for information to assist the CEC in preparing its upcoming IEPR report. Please feel free to contact us for any additional information you may need. As noted Darryl Dunn will be the future point person for responding to CEC data requests.

Best of luck with your report.

## **Explanatory Notes**

### **Electricity Resource Planning Forms S-2 (Monthly and Yearly)**

Although we have provided information for all of the required fields, we have not changed any of the formula calculations embedded in the spreadsheet in order to be consistent with other utilities that are filing the requested information. As a result, some of the formula cells may not accurately reflect CCSF operations as discussed below. Also, monthly and yearly numbers may be off due to rounding conventions embedded in the cell's formatting.

#### **Line 1a (Demand)**

Demand is calculated at PG&E's Newark Substation and therefore is not adjusted for distribution losses.

#### **Line 5 (Self-Generation) and Line 26**

All of the generation CCSF listed in *Line 5 (Self-Generation)* is from renewable resources. However, *Line 26e (Total State-Defined Eligible Renewable Energy)* does not include this line in its calculations. The result is to understate the amount of CCSF's eligible renewable energy.

#### **Line 10 (Firm Sales Obligations)**

Sales are considered "firm" only if CCSF scheduled spinning reserves to cover the sale.

#### **Line 18a and 18b (Renewable Energy Contractual Resources)**

As explained in more detail in response to Form S-5, CCSF has a "banking" provision with PG&E which allows CCSF to deposit excess energy generated by CCSF into a Deferred Delivery Account (DDA) for withdrawal at a later time. Actual withdrawals are shown for January 2009. For the other months, there is no showing of expected net monthly deposits or withdrawals.

**Line 22 (LSE Energy Needs or Surplus)**

As noted in response to Line 18a and 18b the net monthly deposits (or withdrawals) to the DDA account are not shown. As a result, for months in which an energy need is shown, this need may be being met by DDA withdrawals.

**Electricity Resource Planning Forms S-2 (Monthly and Yearly)  
Bilateral Contracts and Power Purchase Agreements**

Description of PG&E FERC Tariff 114  
CCSF-PG&E Interconnection Agreement

Under the CCSF-PG&E Interconnection Agreement (IA), CCSF is allowed to deposit "excess energy" generated by CCSF (as defined in the IA) into a Deferred Delivery Account (DDA). CCSF is allowed to deposit up to a maximum of 110,000 MWh into the DDA (IA, Sec. 7.3.5) and may withdraw up to 75 MWh per hour to meet its energy needs (IA Sec. 7.3.2) subject to the provisions of the IA.

For purposes of this report actual withdrawals from the DDA are shown for January 2009. For all other months, no forecast of net monthly deposits or withdrawals is provided. Thus, for those months when monthly CCSF generation shown is less than CCSF demand, this shortage may be being met by a net monthly withdrawal from the DDA. As noted in Form S-2, *Line 22 (LSE Energy Needs or Surplus)*, the amount shown is less than 2% of CCSF's needs.

Actual use of the DDA by CCSF will vary by hour depending upon CCSF needs, Raker Act, contractual obligations, and Hetch Hetchy hourly operations.

Should the combination of Hetch Hetchy generation and DDA withdrawals be insufficient to meet CCSF needs, any remaining energy needs would be met by short-term (generally monthly or quarterly) bilateral contracts.