

## VALLEY CLEAN ENERGY ALLIANCE

### Staff Report – Item 10

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TO: Board of Directors

FROM: Gordon Samuel, Chief Operating Officer

SUBJECT: Accept and attest to the veracity of VCE’s 2023 Power Source Disclosure Reports for the Base Green, Standard Green, and UltraGreen products and 2023 Power Content Label

DATE: November 14, 2024

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**RECOMMENDATION:**

Attest to the veracity of the information presented in Valley Clean Energy’s 2023 Power Source Disclosure Annual Reports and Power Content Label for the Base Green, Standard Green, and UltraGreen products.

**BACKGROUND:**

California Public Utilities Code requires all retail sellers of electric energy, including VCE, to disclose “accurate, reliable, and simple-to-understand information on the sources of energy, and the associated emissions of greenhouse gases,” that are delivered to their respective customers.<sup>1</sup> Applicable regulations direct retail sellers to provide such communications no later than October 1<sup>st</sup> of each year.<sup>2</sup> The format for requisite communications is highly prescriptive, offering little flexibility to retail sellers when presenting such information to customers. This format has been termed the “Power Content Label” by the California Energy Commission (CEC).

Information presented in the Power Content Label includes the appropriate share of total energy supply based on resource type, including both renewable and conventional fuel sources. In the event that a retail seller meets a certain percentage of its supply obligation from unspecified resources, the report must identify such purchases as “unspecified sources of power.” “Unspecified sources of power” refers to electricity that cannot be sourced back to a specific generator, such as energy purchased through open market transactions.

During the 2023 calendar year, VCE delivered a substantial portion of its electric energy supply from various renewable energy sources, including eligible hydroelectric and solar resources. For VCE Base Green customers, 26.3% of the energy delivered was from renewable energy resources with a greenhouse gas emissions intensity of 695 lbs CO<sub>2</sub>e/MWh. For VCE Standard

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<sup>1</sup> California Public Utilities Code Section 398.1(b).

<sup>2</sup> This year, the California Energy Commission extended this deadline due to WREGIS reporting delays. For the 2023 compliance year, the Power Content Labels and self-attestation is due January 31, 2025.

Green customers, 39.5% of the energy delivered was from renewable energy resources with a greenhouse gas emissions intensity of 449 lbs CO<sub>2</sub>e/MWh. For UltraGreen customers, 100% of the energy delivered was generated from renewable energy resources with a greenhouse gas emissions intensity of 0 lbs CO<sub>2</sub>e/MWh. A copy of VCE's Power Content Label listing the energy resources used during 2023 is attached.

Consistent with applicable regulations and CEC guidance, VCE will complete required customer communications in accordance with the January 31, 2025 deadline. All customers currently enrolled in the VCE program will receive the Power Content Label via mail or e-mail, as applicable.

To fulfill its Power Content Label reporting obligation, VCE may provide the CEC with the Board's attestation regarding the veracity of the information presented in VCE's 2023 Power Source Disclosure Annual Reports and Power Content Label for the Base Green, Standard Green, and UltraGreen products. Staff recommends VCE self-certify the Base Green, Standard Green, and UltraGreen products in lieu of submitting them to a third-party Certified Public Accountant for a formal audit. VCE's technical consultants (The Energy Authority) prepared the Power Source Disclosure annual reports, which were subsequently reviewed by another VCE consultant (EQ Research). EQ Research's review, as detailed in the attached report, verified that the information contained in the annual reports and Power Content Label is accurate.

Based on the foregoing, staff requests that the Board accept this determination and attest to the veracity of the information included in VCE's Power Source Disclosure annual reports and Power Content Label for the Base Green, Standard Green and Ultra Green products for the 2023 calendar year.

**ATTACHMENTS:**

- 1) 2023 Annual Power Source Disclosure Report for the Base Green Product
- 2) 2023 Annual Power Source Disclosure Report for the Standard Green Product
- 3) 2023 Annual Power Source Disclosure Report for the Ultra Green Product
- 4) 2023 Power Content Label
- 5) EQ Research Report re 2023 Power Source Disclosure Annual Reports and Power Content Label

## 2023 POWER SOURCE DISCLOSURE ANNUAL REPORT

### For the Year Ending December 31, 2023

Retail suppliers are required to use the posted template and are not allowed to make edits to this format. Please complete all requested information.

### GENERAL INSTRUCTIONS

RETAIL SUPPLIER NAME	
Valley Clean Energy Alliance	
ELECTRICITY PORTFOLIO NAME	
Base Green	
CONTACT INFORMATION	
NAME	Gordon Samuel
TITLE	Chief Operating Officer
MAILING ADDRESS	604 2nd Street
CITY, STATE, ZIP	Davis, CA 95616
PHONE	(530) 446-2750
EMAIL	<a href="mailto:info@valleycleanenergy.org">info@valleycleanenergy.org</a>
WEBSITE URL FOR PCL POSTING	<a href="https://valleycleanenergy.org/power-sources/">https://valleycleanenergy.org/power-sources/</a>

Submit the Annual Report and signed Attestation in PDF format with the Excel version of the Annual Report to [PSDprogram@energy.ca.gov](mailto:PSDprogram@energy.ca.gov). Remember to complete the Retail Supplier Name, Electricity Portfolio Name, and contact information above, and submit separate reports and attestations for each additional portfolio if multiple were offered in the previous year.

**NOTE:** Information submitted in this report is not automatically held confidential. If your company wishes the information submitted to be considered confidential an authorized representative must submit an application for confidential designation (CEC-13), which can be found on the California Energy Commissions's website at <https://www.energy.ca.gov/about/divisions-and-offices/chief-counsels-office>.

If you have questions, contact Power Source Disclosure (PSD) staff at [PSDprogram@energy.ca.gov](mailto:PSDprogram@energy.ca.gov) or (916) 639-0573.

**2023 POWER SOURCE DISCLOSURE ANNUAL REPORT**  
**SCHEDULE 1: PROCUREMENTS AND RETAIL SALES**  
**For the Year Ending December 31, 2023**  
**Valley Clean Energy Alliance**  
**Base Green**

Instructions: Enter information about power procurements underlying this electricity portfolio for which your company is filing the Annual Report. Insert additional rows as needed. All fields in white should be filled out. **Fields in grey auto-populate as needed and should not be filled out.** For EIA IDs for unspecified power or specified system mixes from asset-controlling suppliers, enter "Unspecified Power", "BPA", or "Tacoma Power" as applicable. For specified procurements of ACS power, use the ACS Procurement Calculator to calculate the resource breakdown comprising the ACS system mix. **Procurements of unspecified power must not be entered as line items below; unspecified power will be calculated automatically in cell N9.** Unbundled RECs must not be entered on Schedule 1; these products must be entered on Schedule 2. At the bottom portion of the schedule, provide the other electricity end-uses that are not retail sales including, but not limited to transmission and distribution losses or municipal street lighting. Amounts should be in megawatt-hours.

Retail Sales (MWh)	110
Net Specified Procurement (MWh)	29
Unspecified Power (MWh)	81
Procurement to be adjusted	-
Net Specified Natural Gas	-
Net Specified Coal & Other Fossil Fuels	-
Net Specified Nuclear, Large Hydro, Renewables, and ACS Power	29
GHG Emissions (excludes grandfathered emissions)	35
GHG Emissions Intensity (in MT CO <sub>2</sub> e/MWh)	0.3154

DIRECTLY DELIVERED RENEWABLES													
Facility Name	Fuel Type	State or Province	WREGIS ID	RPS ID	N/A	EIA ID	Gross MWh Procured	MWh Resold	Net MWh Procured	Adjusted Net MWh Procured	GHG Emissions Factor (in MT CO <sub>2</sub> e/MWh)	GHG Emissions (in MT CO <sub>2</sub> e)	N/A
Resurgence Solar I, LLC	Solar	CA	W16178	65013A		64489	29		29	29	#N/A		
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		

FIRMED-AND-SHAPED IMPORTS													
Facility Name	Fuel Type	State or Province	WREGIS ID	RPS ID	EIA ID of REC Source	EIA ID of Substitute Power	Gross MWh Procured	MWh Resold	Net MWh Procured	Adjusted Net MWh Procured	GHG Emissions Factor (in MT CO <sub>2</sub> e/MWh)	GHG Emissions (in MT CO <sub>2</sub> e)	Eligible for Grandfathered Emissions?
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		

SPECIFIED NON-RENEWABLE PROCUREMENTS													
Facility Name	Fuel Type	State or Province	N/A	N/A	N/A	EIA ID	Gross MWh Procured	MWh Resold	Net MWh Procured	Adjusted Net MWh Procured	GHG Emissions Factor (in MT CO <sub>2</sub> e/MWh)	GHG Emissions (in MT CO <sub>2</sub> e)	N/A
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		
									-	-	#N/A		

PROCUREMENTS FROM ASSET-CONTROLLING SUPPLIERS													
Facility Name	Fuel Type	N/A	N/A	N/A	N/A	EIA ID	Gross MWh Procured	MWh Resold	Net MWh Procured	Adjusted Net MWh Procured	GHG Emissions Factor (in MT CO <sub>2</sub> e/MWh)	GHG Emissions (in MT CO <sub>2</sub> e)	N/A
										-	#N/A		
										-	#N/A		
										-	#N/A		

<b>END USES OTHER THAN RETAIL SALES</b>	<b>MWh</b>
Distribution Losses	23

<b>Total Retired Unbundled RECs</b>	<b>17</b>
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[illegible]

**2023 POWER SOURCE DISCLOSURE ANNUAL REPORT**  
**SCHEDULE 3: POWER CONTENT LABEL DATA**  
**For the Year Ending December 31, 2023**  
**Valley Clean Energy Alliance**  
**Base Green**

Instructions: No data input is needed on this schedule. Retail suppliers should use these auto-populated calculations to fill out their Power Content Labels.

	Adjusted Net Procured (MWh)	Percent of Total Retail Sales
<b>Renewable Procurements</b>	29	26.3%
Biomass & Biowaste	-	0.0%
Geothermal	-	0.0%
Eligible Hydroelectric	-	0.0%
Solar	29	26.3%
Wind	-	0.0%
Coal	-	0.0%
Large Hydroelectric	-	0.0%
Natural gas	-	0.0%
Nuclear	-	0.0%
Other	-	0.0%
Unspecified Power	81	73.7%
<b>Total</b>	<b>110</b>	<b>100.0%</b>

<b>Total Retail Sales (MWh)</b>	<b>110</b>
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<b>GHG Emissions Intensity (converted to lbs CO<sub>2</sub>e/MWh)</b>	<b>695</b>
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<b>Percentage of Retail Sales Covered by Retired Unbundled RECs</b>	<b>15.5%</b>
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**2023 POWER SOURCE DISCLOSURE ANNUAL REPORT  
ATTESTATION FORM  
For the Year Ending December 31, 2023  
Valley Clean Energy Alliance  
Base Green**

I, Gordon Samuel, Chief Operating Officer, declare under penalty of perjury, that the information provided in this report is true and correct and that I, as an authorized agent of Valley Clean Energy Alliance, have authority to submit this report on the retail supplier's behalf. I further declare that all of the electricity claimed as specified purchases as shown in this report was sold once and only once to retail customers.

Name: Gordon Samuel

Representing (Retail Supplier): Valley Clean Energy Alliance



Signature: \_\_\_\_\_

Dated: August 21, 2024

Executed at: Davis, California

## 2023 POWER SOURCE DISCLOSURE ANNUAL REPORT For the Year Ending December 31, 2023

Retail suppliers are required to use the posted template and are not allowed to make edits to this format. Please complete all requested information.

### GENERAL INSTRUCTIONS

RETAIL SUPPLIER NAME	
Valley Clean Energy Alliance	
ELECTRICITY PORTFOLIO NAME	
Standard Green	
CONTACT INFORMATION	
NAME	Gordon Samuel
TITLE	Chief Operating Officer
MAILING ADDRESS	604 2nd Street
CITY, STATE, ZIP	Davis, CA 95616
PHONE	(530) 446-2750
EMAIL	<a href="mailto:info@valleycleanenergy.org">info@valleycleanenergy.org</a>
WEBSITE URL FOR PCL POSTING	<a href="https://valleycleanenergy.org/power-sources/">https://valleycleanenergy.org/power-sources/</a>

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**2023 POWER SOURCE DISCLOSURE ANNUAL REPORT**  
**SCHEDULE 1: PROCUREMENTS AND RETAIL SALES**  
For the Year Ending December 31, 2023  
Valley Clean Energy Alliance  
Standard Green

Instructions: Enter information about power procurements underlying this electricity portfolio for which your company is filing the Annual Report. Insert additional rows as needed. All fields in white should be filled out. **Fields in grey auto-populate as needed and should not be filled out.** For EIA IDs for unspecified power or specified system mixes from asset-controlling suppliers, enter "Unspecified Power", "BPA", or "Tacoma Power" as applicable. For specified procurements of ACS power, use the ACS Procurement Calculator to calculate the resource breakdown comprising the ACS system mix. **Procurements of unspecified power must not be entered as line items below; unspecified power will be calculated automatically in cell N9.** Unbundled RECs must not be entered on Schedule 1; these products must be entered on Schedule 2. At the bottom portion of the schedule, provide the other electricity end-uses that are not retail sales including, but not limited to transmission and distribution losses or municipal street lighting. Amounts should be in megawatt-hours.

Retail Sales (MWh)	645,384
Net Specified Procurement (MWh)	338,052
Unspecified Power (MWh)	307,332
Procurement to be adjusted	-
Net Specified Natural Gas	-
Net Specified Coal & Other Fossil Fuels	-
Net Specified Nuclear, Large Hydro, Renewables, and ACS Power	338,052
GHG Emissions (excludes grandfathered emissions)	131,538
GHG Emissions Intensity (in MT CO <sub>2</sub> e/MWh)	0.2038

DIRECTLY DELIVERED RENEWABLES													
Facility Name	Fuel Type	State or Province	WREGIS ID	RPS ID	N/A	EIA ID	Gross MWh Procured	MWh Resold	Net MWh Procured	Adjusted Net MWh Procured	GHG Emissions Factor (in MT CO <sub>2</sub> e/MWh)	GHG Emissions (in MT CO <sub>2</sub> e)	N/A
Indian Valley Hydro	Eligible hydro	CA	W607	60161A		50129	1,987		1,987	1,987	-	-	
Resurgence Solar I, LLC	Solar	CA	W16178	65013A		64489	140,897		140,897	140,897	#N/A	-	
Aquamarine Westside, LLC	Solar	CA	W12082	64553A		62547	112,095		112,095	112,095	-	-	
									-	-	#N/A	-	
									-	-	#N/A	-	
									-	-	#N/A	-	
									-	-	#N/A	-	
									-	-	#N/A	-	
									-	-	#N/A	-	
									-	-	#N/A	-	

FIRMED AND-SHAPED IMPORTS													
Facility Name	Fuel Type	State or Province	WREGIS ID	RPS ID	EIA ID of REC Source	EIA ID of Substitute Power	Gross MWh Procured	MWh Resold	Net MWh Procured	Adjusted Net MWh Procured	GHG Emissions Factor (in MT CO <sub>2</sub> e/MWh)	GHG Emissions (in MT CO <sub>2</sub> e)	Eligible for Grandfathered Emissions?
									-	-	#N/A	-	
									-	-	#N/A	-	
									-	-	#N/A	-	
									-	-	#N/A	-	
									-	-	#N/A	-	

SPECIFIED NON-RENEWABLE PROCUREMENTS													
Facility Name	Fuel Type	State or Province	N/A	N/A	N/A	EIA ID	Gross MWh Procured	MWh Resold	Net MWh Procured	Adjusted Net MWh Procured	GHG Emissions Factor (in MT CO <sub>2</sub> e/MWh)	GHG Emissions (in MT CO <sub>2</sub> e)	N/A
Balch #1 PH	Large hydro	CA				217	1,800		1,800	1,800	-	-	
Balch #2 PH	Large hydro	CA				218	4,951		4,951	4,951	-	-	
Belden	Large hydro	CA				219	2,122		2,122	2,122	-	-	
Bucks Creek	Large hydro	CA				220	705		705	705	-	-	
Butt Valley	Large hydro	CA				221	1,454		1,454	1,454	-	-	
Caribou 1	Large hydro	CA				222	1,955		1,955	1,955	-	-	
Caribou 2	Large hydro	CA				223	4,192		4,192	4,192	-	-	
Cresta	Large hydro	CA				231	1,217		1,217	1,217	-	-	
Drum #1	Large hydro	CA				235	853		853	853	-	-	
Drum #2	Large hydro	CA				236	2,659		2,659	2,659	-	-	
Electra	Large hydro	CA				239	3,849		3,849	3,849	-	-	
Haas	Large hydro	CA				240	4,946		4,946	4,946	-	-	
James B Black	Large hydro	CA				249	4,600		4,600	4,600	-	-	
Kerckhoff #2 PH	Large hydro	CA				682	5,257		5,257	5,257	-	-	
Kings River	Large hydro	CA				254	2,091		2,091	2,091	-	-	
Pit 1	Large hydro	CA				265	1,879		1,879	1,879	-	-	
Pit 3	Large hydro	CA				266	3,303		3,303	3,303	-	-	
Pit 4	Large hydro	CA				267	3,859		3,859	3,859	-	-	
Pit 5	Large hydro	CA				268	6,677		6,677	6,677	-	-	
Pit 6	Large hydro	CA				269	2,463		2,463	2,463	-	-	
Pit 7	Large hydro	CA				270	2,739		2,739	2,739	-	-	
Poe	Large hydro	CA				272	6,270		6,270	6,270	-	-	
Rock Creek	Large hydro	CA				275	4,326		4,326	4,326	-	-	
Salt Springs	Large hydro	CA				279	1,948		1,948	1,948	-	-	
Stanislaus	Large hydro	CA				285	3,221		3,221	3,221	-	-	
Tiger Creek	Large hydro	CA				287	2,431		2,431	2,431	-	-	
NID-Chicago Park	Large hydro	CA				412	1,307		1,307	1,307	-	-	

PROCUREMENTS FROM ASSET-CONTROLLING SUPPLIERS													
Facility Name	Fuel Type	N/A	N/A	N/A	N/A	EIA ID	Gross MWh Procured	MWh Resold	Net MWh Procured	Adjusted Net MWh Procured	GHG Emissions Factor (in MT CO <sub>2</sub> e/MWh)	GHG Emissions (in MT CO <sub>2</sub> e)	N/A
										-	#N/A	-	
										-	#N/A	-	
										-	#N/A	-	
										-	#N/A	-	

<b>END USES OTHER THAN RETAIL SALES</b>	<b>MWh</b>
Distribution Losses	132,390

[illegible]

**2023 POWER SOURCE DISCLOSURE ANNUAL REPORT**  
**SCHEDULE 3: POWER CONTENT LABEL DATA**  
**For the Year Ending December 31, 2023**  
**Valley Clean Energy Alliance**  
**Standard Green**

Instructions: No data input is needed on this schedule. Retail suppliers should use these auto-populated calculations to fill out their Power Content Labels.

	Adjusted Net Procured (MWh)	Percent of Total Retail Sales
<b>Renewable Procurements</b>	254,979	39.5%
Biomass & Biowaste	-	0.0%
Geothermal	-	0.0%
Eligible Hydroelectric	1,987	0.3%
Solar	252,992	39.2%
Wind	-	0.0%
Coal	-	0.0%
Large Hydroelectric	83,073	12.9%
Natural gas	-	0.0%
Nuclear	-	0.0%
Other	-	0.0%
Unspecified Power	307,332	47.6%
<b>Total</b>	<b>645,384</b>	<b>100.0%</b>

<b>Total Retail Sales (MWh)</b>	<b>645,384</b>
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<b>GHG Emissions Intensity (converted to lbs CO<sub>2</sub>e/MWh)</b>	<b>449</b>
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<b>Percentage of Retail Sales Covered by Retired Unbundled RECs</b>	<b>15.5%</b>
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**2023 POWER SOURCE DISCLOSURE ANNUAL REPORT  
ATTESTATION FORM  
For the Year Ending December 31, 2023  
Valley Clean Energy Alliance  
Standard Green**

I, Gordon Samuel, Chief Operating Officer, declare under penalty of perjury, that the information provided in this report is true and correct and that I, as an authorized agent of Valley Clean Energy Alliance, have authority to submit this report on the retail supplier's behalf. I further declare that all of the electricity claimed as specified purchases as shown in this report was sold once and only once to retail customers.

Name: Gordon Samuel

Representing (Retail Supplier): Valley Clean Energy Alliance

*Gordon Samuel*

Signature: \_\_\_\_\_

Dated: August 21, 2024

Executed at: Davis, California

## 2023 POWER SOURCE DISCLOSURE ANNUAL REPORT

### For the Year Ending December 31, 2023

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### GENERAL INSTRUCTIONS

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Valley Clean Energy Alliance	
ELECTRICITY PORTFOLIO NAME	
UltraGreen	
CONTACT INFORMATION	
NAME	Gordon Samuel
TITLE	Chief Operating Officer
MAILING ADDRESS	604 2nd Street
CITY, STATE, ZIP	Davis, CA 95616
PHONE	(530) 446-2750
EMAIL	<a href="mailto:info@valleycleanenergy.org">info@valleycleanenergy.org</a>
WEBSITE URL FOR PCL POSTING	<a href="https://valleycleanenergy.org/power-sources/">https://valleycleanenergy.org/power-sources/</a>

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[illegible]

**2023 POWER SOURCE DISCLOSURE ANNUAL REPORT**  
**SCHEDULE 2: RETIRED UNBUNDLED RECS**  
**For the Year Ending December 31, 2023**  
**Valley Clean Energy Alliance**  
**UltraGreen**

INSTRUCTIONS: Enter information about retired unbundled RECs associated with this electricity portfolio. Insert additional rows as needed. All fields in white should be filled out. Fields in grey auto-populate as needed and should not be filled out.

[illegible]

**2023 POWER SOURCE DISCLOSURE ANNUAL REPORT**  
**SCHEDULE 3: POWER CONTENT LABEL DATA**  
**For the Year Ending December 31, 2023**  
**Valley Clean Energy Alliance**  
**UltraGreen**

Instructions: No data input is needed on this schedule. Retail suppliers should use these auto-populated calculations to fill out their Power Content Labels.

	Adjusted Net Procured (MWh)	Percent of Total Retail Sales
<b>Renewable Procurements</b>	9,141	100.0%
Biomass & Biowaste	-	0.0%
Geothermal	-	0.0%
Eligible Hydroelectric	3,922	42.9%
Solar	5,219	57.1%
Wind	-	0.0%
Coal	-	0.0%
Large Hydroelectric	-	0.0%
Natural gas	-	0.0%
Nuclear	-	0.0%
Other	-	0.0%
Unspecified Power	-	0.0%
<b>Total</b>	<b>9,141</b>	<b>100.0%</b>

<b>Total Retail Sales (MWh)</b>	<b>9,141</b>
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<b>GHG Emissions Intensity (converted to lbs CO<sub>2</sub>e/MWh)</b>	<b>-</b>
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<b>Percentage of Retail Sales Covered by Retired Unbundled RECs</b>	<b>0.0%</b>
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**2023 POWER SOURCE DISCLOSURE ANNUAL REPORT  
ATTESTATION FORM  
For the Year Ending December 31, 2023  
Valley Clean Energy Alliance  
UltraGreen**

I, Gordon Samuel, Chief Operating Officer, declare under penalty of perjury, that the information provided in this report is true and correct and that I, as an authorized agent of Valley Clean Energy Alliance, have authority to submit this report on the retail supplier's behalf. I further declare that all of the electricity claimed as specified purchases as shown in this report was sold once and only once to retail customers.

Name: Gordon Samuel

Representing (Retail Supplier): Valley Clean Energy Alliance



Signature: \_\_\_\_\_

Dated: August 21, 2024

Executed at: Davis, California

2023 POWER CONTENT LABEL								
Valley Clean Energy Alliance								
<a href="https://valleycleanenergy.org/power-sources/">https://valleycleanenergy.org/power-sources/</a>								
Greenhouse Gas Emissions Intensity (lbs CO <sub>2</sub> e/MWh)				Energy Resources	Standard Green	UltraGreen	Base Green	2023 CA Power Mix
Standard Green	UltraGreen	Base Green	2023 CA Utility Average	Eligible Renewable <sup>1</sup>	39.5%	100.0%	26.3%	36.9%
449	0	695	373	Biomass & Biowaste	0.0%	0.0%	0.0%	2.1%
				Geothermal	0.0%	0.0%	0.0%	4.8%
				Eligible Hydroelectric	0.3%	42.9%	0.0%	1.8%
				Solar	39.2%	57.1%	26.3%	17.0%
				Wind	0.0%	0.0%	0.0%	11.2%
				Coal	0.0%	0.0%	0.0%	1.8%
				Large Hydroelectric	12.9%	0.0%	0.0%	11.7%
				Natural Gas	0.0%	0.0%	0.0%	36.6%
				Nuclear	0.0%	0.0%	0.0%	9.3%
				Other	0.0%	0.0%	0.0%	0.1%
				Unspecified Power <sup>2</sup>	47.6%	0.0%	73.7%	3.7%
				TOTAL	100.0%	100.0%	100.0%	100.0%
Percentage of Retail Sales Covered by Retired Unbundled RECs <sup>3</sup> :					16%	0%	16%	
<sup>1</sup> The eligible renewable percentage above does not reflect RPS compliance, which is determined using a different methodology. <sup>2</sup> Unspecified power is electricity that has been purchased through open market transactions and is not traceable to a specific generation source. <sup>3</sup> Renewable energy credits (RECs) are tracking instruments issued for renewable generation. Unbundled renewable energy credits (RECs) represent renewable generation that was not delivered to serve retail sales. Unbundled RECs are not reflected in the power mix or GHG emissions intensities above.								
For specific information about this electricity portfolio, contact:					Valley Clean Energy Alliance 1-855-699-8232			
For general information about the Power Content Label, visit:					<a href="https://www.energy.ca.gov/programs-and-topics/programs/power-source-disclosure-program">https://www.energy.ca.gov/programs-and-topics/programs/power-source-disclosure-program</a>			

# Valley Clean Energy Alliance

## POWER SOURCE DISCLOSURE INDEPENDENT REVIEW OF STANDARD GREEN, ULTRAGREEN, AND BASE GREENS PRODUCTS FOR REPORTING YEAR 2023

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To: Gordon Samuel, Chief Operating Officer

From: Miriam Makhoun, CEO, EQ Research, LLC

Date: October 31, 2024

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### Introduction

Valley Clean Energy Alliance (VCE) has engaged EQ Research, LLC (EQ Research) to assist with an independent review of VCE's Base Green, Standard Green, and UltraGreen Power Source Disclosure (PSD) Annual Reports (together, the "Annual Reports") and Power Content Label (PCL) for the year ending December 31, 2023. EQ Research performed the procedures enumerated below to assist VCE with complying with the auditing and verification requirements of the PSD Program, as defined in Section 1394.2 of the California Code of Regulations, Title 20.

EQ Research obtained the underlying documentation<sup>1</sup> used by VCE's consultant, The Energy Authority (TEA), to complete the Annual Reports and accepts the accuracy of the information provided by VCE and TEA. EQ Research did not access VCE's Western Renewable Energy Generation Information System (WREGIS) account information to verify the authenticity of the information provided by VCE but was provided an export of information from WREGIS.<sup>2</sup>

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<sup>1</sup> All files referenced in this report can be accessed at: <https://eq-research.sharefile.com/public/share/web-s7f2a2b1531d042bcb77cfcc8b558a703>

<sup>2</sup> See the file entitled, "2023 PSD Supply Product Allocations.xlsx" in the ShareFile link.

## Review Procedures and Findings

EQ Research based its detailed review of the Annual Reports on the audit procedures detailed in Section 1394.2(b) of the PSD program regulations. The procedures and associated findings for the Annual Reports are detailed below.

### Base Green, Standard Green, and UltraGreen PSD Report Review

#### *Audit Procedures (1)(A)*

EQ Research used the following publicly available sources in order to validate the information in the Annual Reports:

Source 1 (EIA): Energy Information Administration (EIA) Form 923 detailed data, *EIA923\_Schedules\_2\_3\_4\_5\_M\_12\_2023\_Final.xlsx*, Page 1 Generation and Fuel Data, accessed on October 27, 2024 from <https://www.eia.gov/electricity/data/eia923/>

Source 2 (EIA): EIA Form 860 detailed data, *3\_1\_Generator\_Y2023.xlsx*, Operable tab, accessed on September 24, 2024 from <https://www.eia.gov/electricity/data/eia860/>

Source 3 (CEC): California Energy Commission (CEC), California's Renewables Portfolio Standard (RPS) Public Search exported to Excel, accessed on September 24, 2024 from <https://rps.energy.ca.gov/Pages/Search/SearchApplications.aspx>

EQ Research agreed the specified purchases<sup>3</sup> by (a) facility name, (b) facility number provided by EIA and/or RPS ID, (c) kilowatt-hours, and (d) fuel type from the information used to prepare used to prepare the Annual Reports is consistent with what is presented in the Annual Reports Schedule 1<sup>4</sup> with one note and two minor exceptions:

- Note: The listed EIA Plant ID # 64489 for Resurgence Solar I, LLC includes two rows in the EIA data: one for the battery portion showing negative MWh and another for the solar portion showing only positive MWh. The solar portion was used to validate the contents of this report.
- Exception 1: There is no EIA Form 923 generation data for Putah Creek Solar Farm North so the kWh could not be cross-verified with EIA data.
- Exception 2: Aquamarine Westside, LLC was reported to supply 112,095 MWh and this is shown in the WREGIS REC export but invoices show it to be 0.44 MWh less than reported (112,094.56 MWh). This is likely an artifact of rounding from the invoice process and is inconsequential to the filing.

EQ Research verified that the MWh listed in the Annual Reports do not exceed the annual MWh from EIA 923 data as expected (see Appendix A. Specified Facility Review Results) with two minor exceptions:

- Resurgence Solar I (EIA Plant ID # 64489) solar row shows 98,700 MWh in months August through December 2023 instead of the expected 140,925.93 MWh shown as retired 2023 RECs (140,897 MWh for the Standard Green tariff and 28.93 MWh for the Base Green tariff). This is because test energy of 42,354.29 MWh produced between May and July 2023 was not reported to the EIA. If it had been reported, 141,054.29 would be the total amount of MWh in EIA 923 for Resurgence Solar 1 which is an excess of 128.36 MWh.
- There is no EIA Form 923 generation data for Putah Creek Solar Farm North so the kWh could not be cross-verified with EIA data.

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<sup>3</sup> There were no resales.

<sup>4</sup> This information was checked against information in the following links: Source for RPS IDs: <https://rps.energy.ca.gov/Pages/Search/SearchApplications.aspx>; Source for EIA IDs: <https://www.eia.gov/electricity/data/eia923/>. (Last accessed September 24, 2024).

EQ Research also tested the mathematical accuracy of each Annual Report and noted no exceptions.

*Audit Procedures (1)(B)(1)*

EQ Research agreed the facility name, facility numbers provided by EIA and RPS, kilowatt-hours, and the fuel type from the invoice match the information used to prepare Schedule 1 of the Annual Reports.

EQ Research verified the above information by comparing information from all 42 invoices for power purchases represented in the 2023 Annual Reports and the information used to prepare Schedule 1 of the Annual Reports along with the CEC and EIA data mentioned in (b) Audit Procedures (1)(A) above. The invoices were for purchases of 364,150.15 MWh, which is 16,928.24 MWh more than reported. For reference, 264,150.15 MWh of the total 347,221.915 MWh reported or 76% were for PCC1 renewable energy. The other 100,000 MWh shown on one of the invoices was for unbundled PCC3 RECs from carbon-free power sources.

See Appendix B. Sample of Purchases VCE used to Prepare Schedule 1.

*Audit Procedures (1)(B)(2)*

This is not applicable since there are no facilities in the Annual Reports owned by VCE.

*Audit Procedures (1)(B)(3)*

EQ Research verified a match between the date of generation from the 41 PCC1 invoices in the sample to the reporting period of the information used to prepare Schedule 1.

See the “Energy Delivery Term” column in Appendix B. Sample of Purchases VCE used to Prepare Schedule 1 and review the PCC1 delivery dates.

*Audit Procedures (1)(B)(4)*

VCE used 83,072.99 MWh of unbundled PCC3 RECs for the Base Green and Standard Green products in 2023 and these RECs were retired in 2023 according to WREGIS statements.

*Audit Procedures (1)(C)*

Section 1393(d) provides that the emissions from purchases of eligible firm-and-shaped products under a purchase agreement or ownership arrangement executed prior to January 1, 2019 are excluded from a portfolio’s emissions intensity calculation. As shown on Schedule 1 of the Annual Reports, VCE did not claim any purchases from firm-and-shaped imports for the Base Green, Standard Green, or UltraGreen products.

*Audit Procedures (2)*

EQ Research obtained a copy of the 2023 Power Content Label to be provided to VCE customers for the Base Green, Standard Green, and UltraGreen products. EQ Research verified that the resource portfolio percentages listed for each product on the 2023 Power Content Label match the respective percentages listed in Schedule 3 of the Power Source Disclosure Annual Reports. EQ Research also verified that the greenhouse gas emissions intensity for each product listed on the Power Content Label match those calculated on the Power Source Disclosure Annual Reports.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be and should not be used by anyone other than those specified parties

# Appendix A. Specified Facility Review Results

										EIA Net Generation (MWh)	Gross MWh Generation Procured by VCEA	Net MWh Procured by VCEA	% Resource MWh VCEA Reported of			
RPS	Standard			EIA Plant ID	RPS ID	Facility Name Vlookup using EIA ID	Facility Name VLOOKUP using RPS ID	Facility Name from VCEA Annual Reports				Total EIA MWh	RPS ID Technology	EIA Technology	VCEA Fuel Type	
1	1			66088	64810A	Putah Creek Solar Farm North	Putah Creek Solar Farm North	Putah Creek Solar Farm North	N/A	5,219	5,219	N/A	Photovoltaic	Solar Photovoltaic	Solar	
1	1			50129	60161A	Indian Valley Dam Hydro Project	Indian Vly Hydro Elec Ptn.	Indian Valley Hydro		3,922	3,922		Small Hydroelectric	Conventional Hydroelectric	Eligible hydro	
1		1		50129	60161A	Indian Valley Dam Hydro Project	Indian Vly Hydro Elec Ptn.	Indian Valley Hydro	5,909	1,987	1,987	100.0%	Small Hydroelectric	Conventional Hydroelectric	Eligible hydro	
1				64489	65013A	Resurgence Solar	Resurgence Solar I, LLC	Resurgence Solar I, LLC		140,897	140,897		Photovoltaic	Solar Photovoltaic	Solar	
1			1	64489	65013A	Resurgence Solar	Resurgence Solar I, LLC	Resurgence Solar I, LLC	98,700	29	29	142.8%	Photovoltaic	Solar Photovoltaic	Solar	
1				62547	64553A	Aquamarine	Aquamarine Westside, LLC	Aquamarine Westside, LLC	560,174	112,095	112,095	20.0%	Photovoltaic	Solar Photovoltaic	Solar	
	1			217		0 Balch 1		Balch #1 PH	64,353	1,800	1,800	2.8%		Conventional Hydroelectric	Large hydro	
	1			218		0 Balch 2		Balch #2 PH	226,603	4,951	4,951	2.2%		Conventional Hydroelectric	Large hydro	
	1			219		0 Belden		Belden	174,359	2,122	2,122	1.2%		Conventional Hydroelectric	Large hydro	
	1			220		0 Bucks Creek		Bucks Creek	67,850	705	705	1.0%		Conventional Hydroelectric	Large hydro	
	1			221		0 Butt Valley		Butt Valley	74,617	1,454	1,454	1.9%		Conventional Hydroelectric	Large hydro	
	1			222		0 Caribou 1		Caribou 1	57,797	1,955	1,955	3.4%		Conventional Hydroelectric	Large hydro	
	1			223		0 Caribou 2		Caribou 2	283,724	4,192	4,192	1.5%		Conventional Hydroelectric	Large hydro	
	1			231		0 Cresta		Cresta	155,228	1,217	1,217	0.8%		Conventional Hydroelectric	Large hydro	
	1			235		0 Drum 1		Drum #1	41,615	853	853	2.0%		Conventional Hydroelectric	Large hydro	
	1			236		0 Drum 2		Drum #2	261,235	2,659	2,659	1.0%		Conventional Hydroelectric	Large hydro	
	1			239		0 Electra		Electra	332,444	3,849	3,849	1.2%		Conventional Hydroelectric	Large hydro	
	1			240		0 Haas		Haas	171,261	4,946	4,946	2.9%		Conventional Hydroelectric	Large hydro	
	1			249		0 James B Black		James B Black	310,697	4,600	4,600	1.5%		Conventional Hydroelectric	Large hydro	
	1			682		0 Kerckhoff 2		Kerckhoff #2 PH	296,716	5,257	5,257	1.8%		Conventional Hydroelectric	Large hydro	
	1			254		0 Kings River PH		Kings River	75,624	2,091	2,091	2.8%		Conventional Hydroelectric	Large hydro	
	1			265		0 Pit 1		Pit 1	108,234	1,879	1,879	1.7%		Conventional Hydroelectric	Large hydro	
	1			266		0 Pit 3		Pit 3	112,121	3,303	3,303	2.9%		Conventional Hydroelectric	Large hydro	
	1			267		0 Pit 4		Pit 4	272,952	3,859	3,859	1.4%		Conventional Hydroelectric	Large hydro	
	1			268		0 Pit 5		Pit 5	471,431	6,677	6,677	1.4%		Conventional Hydroelectric	Large hydro	
	1			269		0 Pit 6		Pit 6	170,647	2,463	2,463	1.4%		Conventional Hydroelectric	Large hydro	
	1			270		0 Pit 7		Pit 7	207,624	2,739	2,739	1.3%		Conventional Hydroelectric	Large hydro	
	1			272		0 Poe		Poe	330,608	6,270	6,270	1.9%		Conventional Hydroelectric	Large hydro	
	1			275		0 Rock Creek		Rock Creek	264,501	4,326	4,326	1.6%		Conventional Hydroelectric	Large hydro	
	1			279		0 Salt Springs		Salt Springs	128,143	1,948	1,948	1.5%		Conventional Hydroelectric	Large hydro	
	1			285		0 Stanislaus		Stanislaus	203,421	3,221	3,221	1.6%		Conventional Hydroelectric	Large hydro	
	1			287		0 Tiger Creek		Tiger Creek	226,110	2,431	2,431	1.1%		Conventional Hydroelectric	Large hydro	
	1			412		0 Chicago Park		NID-Chicago Park	102,290	1,307	1,307	1.3%		Conventional Hydroelectric	Large hydro	
TOTALS										5,752,379	347,222	347,222	6.04%			

# Appendix B. Sample of Purchases VCE used to Prepare Schedule 1

Invoice File Name	VCEA MWh on Invoice	Energy Delivery Term	Invoice or PO#	PCC1/2/3	Resource	VCEA PCL Total MWh	Invoice Total MWh	Invoice Total >= PCL Total	Delta
Aquamarine Inv MONEY OWED TO VCE Jan 2023 US 2023FEB21 AQUA-01-017 FINAL	4,049.70	January 2023	AQUA-01-017						
AQUA-01-018 Feb 2023 31430.92CREDIT TO VCE dtd 3-20-23	5,979.63	February 2023	AQUA-01-018						
Aquamarine Inv AQUA-01-019 March 2023 38187.18 dtd 4-21-23 due 5-21-23	6,170.19	March 2023	AQUA-01-019						
Aquamarine AQUA-01-020 April 2023 dtd 5-18-23 321770.52 due 6-17-23	9,630.31	April 2023	AQUA-01-020						
Aquamarine Inv AQUA-01-021 May 2023 272180.22 dtd 6-21-23 due 7-21-23 PAID 11-15-2023	9,916.43	May 2023	AQUA-01-021						
Aquamarine Inv AQUA-01-022 June 2023 296834.59 dtd 7-19-23 due 8-18-23	13,359.48	June 2023	AQUA-01-022						
Aquamarine Inv AQUA-01-023 CREDIT OF 211333.15 July 2023 dtd 8-16-23 due 9-15-23	16,269.14	July 2023	AQUA-01-023						
Aquamarine CREDIT TO VCE Inv AQUA-01-024 August 2023 Power 234770.59 dtd 9-20-23 due 10-20-23	14,643.96	August 2023	AQUA-01-024						
Aquamarine Inv AQUA-01-025 September 2023 153913.64 dtd 10-20-23 due 11-19-23	11,346.24	September 2023	AQUA-01-025						
Aquamarine AQUA-01-026 October 2023 27028.54 dtd 11-21-23 due 12-21-23 PAID 12-19-23	9,320.41	October 2023	AQUA-01-026						
Aquamarine November 2023 Power Inv AQUA-01-027 8055.04 dtd 12-19-23 due 1-18-24	6,862.21	November 2023	AQUA-01-027						
Aquamarine Dec 2023 Power CREDIT TO VCE Inv AQUA-01-028 15630.23	4,546.86	December 2023	AQUA-01-028	1	Aquamarine Westside, LLC	112,095.00	112,094.56	FALSE	(0.44)
Indian Valley Jan 2023 ZERO OWED dtd 2-23-23	-	January 2023	23-Feb-23						
Indian Valley Feb 2023 ZERO OWED dtd 3-21-23	-	February 2023	21-Mar-23						
Indian Valley ZERO OWED March 2023 dtd 4-20-23	-	March 2023	20-Apr-23						
India Valley April 2023 Inv dtd 5-17-23 ZERO OWED	-	April 2023	17-May-23						
Indian Valley June 2023 71912.03 dtd 6-30-23 due 9-29-31 recd 9-25-23	1,500.47	June 2023	30-Jun-23						
Indian Valley July 2023 120471.03 dtd 7-31-23 due 9-29-23 recd 9-25-23	2,135.50	July 2023	31-Jul-23						
Indian Valley August 2023 84608.14 dtd 8-31-23 due 9-29-23 recd 9-25-23	1,923.57	August 2023	31-Aug-23						
Indian Valley September 2023 6117.09 dtd 9-30-23 due 10-31-23 recd 10-17-23	349.67	September 2023	30-Sep-23						
Indian Valley October 2023 Services CREDIT TO VCE 560.22 dtd 10-31-23	-	October 2023	31-Oct-23						
Indian Valley Nov 2023 CREDIT-OWED TO VCE 73.45 dtd 11-30-23 Rcd 12-18-23	-	November 2023	30-Nov-23						
Indian Valley December 2023 CREDIT 5.20 dtd 12-31-23	-	December 2023	31-Dec-23	1	Indian Valley Hydro	5,909.00	5,909.21	TRUE	0.21
Putah Creek Solar Inv 23-1 34421.40 dtd 2-22-23 January 2023	171.48	January 2023	23-1						
Putah Creek Solar Inv 23-2 40739.80 dtd 3-8-23 February 2023	286.36	February 2023	23-2						
Putah Creek Solar Farms Inv 23-3 March 2023 46495 dtd 4-4-23	391.00	March 2023	23-3						
Putah Creek Solar Farms Inv 23-4 April 2023 48105.95 dtd 5-16-23	420.29	April 2023	23-4						
Putah Creek Solar Farms Inv 23-5 May 2023 49978.70 dtd 6-8-23	454.34	May 2023	23-5						
Putah Creek Solar Farms Inv 23-6 June 2023 Power 69212.75 dtd 7-7-23	804.05	June 2023	23-6						
Putah Creek Solar Farms Inv 23-7 July 2023 69210 dtd 8-14-23	804.00	July 2023	23-7						
Putah Creek Solar Farms Inv 23-8 August 2023 59596 dtd 9-8-23	629.20	August 2023	23-8						
Putah Creek Solar Farms Inv 23-9 September 2023 Power 46594 dtd 10-17-23	392.80	September 2023	23-9						
Putah Creek Solar Farm Inv 23-10 October 2023 Power 49698.20 dtd 11-13-23	449.24	October 2023	23-10						
Putah Creek Solar Inv 23-11 November 2023 Power 35715 dtd 12-18-23	195.00	November 2023	23-11						
Putah Creek Solar Farms Inv 23-12 December 2023 37216.50 dtd 1-17-24	222.30	December 2023	23-12	1	Putah Creek Solar Farm North	5,219.00	5,220.06	TRUE	1.06
Resurgence Solar Inv 808528 5-22-23 thru 7-31-23 Charges 822943.92 dtd 8-3-23 due 9-7-23	42,354.29	May-July 2023	808528						
Resurgence Solar I Inv 1721 August 2023 Power 1161558.10 dtd 9-6-23 due 10-5-23	26,303.74	August 2023	1721						
Resurgence Solar - NextEra Inv 1906 September 2023 1155198.63 dtd 10-12-23 due 11-10-23	24,380.50	September 2023	1906						
Resurgence Solar October 2023 Power Inv 2033 1072465.51 dtd 11-10-23 due 11-30-23 PAID 11-27-23	21,187.40	October 2023	2033						
Resurgence Solar I Inv 2360 November 2023 Power 920380.27 dtd 12-8-23 due 1-2-24	15,317.65	November 2023	2360						
Resurgence Solar December 2023 Power Inv. 2616 dtd 1-11-24 818795.22 due 1-30-24	11,382.74	December 2023	2616	1	Resurgence Solar I, LLC	140,925.93	140,926.32	TRUE	0.39
2023 PCC3 Invoice_RPS_VCE	100,000.00	2022 - Retired 2023	400	3	Unbundled Recs	83,072.99	100,000.00	TRUE	16,927.02
<b>TOTALS</b>						<b>347,221.92</b>	<b>364,150.15</b>	<b>TRUE</b>	<b>16,928.24</b>