

VALLEY CLEAN ENERGY ALLIANCE**Staff Report – Item 5**

TO: Community Advisory Committee

FROM: Gordon Samuel, Chief Operating Officer

SUBJECT: Valley Clean Energy’s Policy regarding PG&E allocation of Greenhouse Gas (GHG)-free (Large Hydro and Nuclear) resources to Community Choice Aggregators

DATE: November 16, 2023

RECOMMENDATION

1. Accept the 2024 allocation of large hydro carbon free attributes paid for by VCE customers;
2. Reject the 2024 allocation of nuclear power carbon free attributes;
3. Recommend the Executive Officer to enter into an agreement(s) with PG&E to accept only the Large Hydro portion of the 2024 GHG free allocations; and
4. As approved by the Board in December 2022, in the event the future attributes are made available to VCE and there are no material changes in VCE’s position, staff will continue to bring this item to the Community Advisory Committee (CAC) and Board as part of their respective consent agendas.

BACKGROUND

PG&E owns or contracts for a number of GHG-free resources (including large hydro and nuclear from Diablo Canyon Power Plant). PG&E has been able to count these resources on its power content label (PCL) to meet its GHG-free targets. Load serving entities (LSEs), on the other hand, have been paying for those same assets through Power Charge Indifference Adjustment (PCIA), yet do not receive any of the GHG-free benefits – this includes VCE.

In mid-2019, CCAs approached PG&E to discuss whether PG&E would be agreeable to selling energy from their large hydro facilities¹. PG&E ultimately refused to make sales in 2019, but subsequently approached CCAs and offered to allocate GHG-free resources (nuclear and large hydro) to CCAs and other eligible load serving entities (LSEs).

¹ Large hydro and nuclear resources count as GHG-free on the power content label (PCL), and investor-owned utilities (IOUs) have been benefiting from counting those resources to meet their GHG-free targets. LSEs, on the other hand, have been paying for those same assets through PCIA, yet do not receive any of the GHG-free benefits through the PCL.

Eventually the allocations became available in 2020, and the VCE Board elected to receive the large hydro only attributes. This became effective in the third quarter of 2020 and VCE received approximately 24,000 MWHs in 2020; 37,382 MWHs for 2021; and 53,886 MWHs for 2022 (note: VCE will not know the final 2023 numbers until Q2 2024).

There is no obligation to accept this allocation of GHG-free attributes. An LSE can choose to accept neither resource pool, one or the other, or both. The volume that each LSE receives will ultimately depend on the volume of electricity generated by each resource pool and the proportion of PG&E’s load served by the LSE.

TENTATIVE SCHEDULE

November 1, 2023	· Notice Issued
Up to Week of November 6, 2023	· PG&E will provide Eligible LSEs with 2024 Sales Agreement for Review
Wednesday, November 15, 2023 (ACTION REQUIRED)	· Feedback on form Sales Agreement due to PG&E
Up to Week of December 11, 2023 (ACTION REQUIRED)	· PG&E will provide Eligible LSEs Offers and a final version of 2024; PG&E and Eligible LSEs will execute 2024 Sales Agreement
January 1, 2024 (<i>pending execution of Sales Agreement</i>)	· Expected start of Delivery Period under 2024 Sales Agreement
Week of June 18, 2024 (<i>approximation</i>)	· First Quarterly Report with estimated Allocation Amount will be distributed
On or about April 15, 2025	· Final Report will be distributed to participating LSEs

RECOMMENDATION

As discussed with the CAC and Board in the past on the topic of allocations, staff continues to believe that:

- The potential reputational risk from accepting the nuclear allocation as part of our GHG-free target is greater than the potential savings for accepting this allocation.
- The monetary savings for either of these allocations is very low.
- Generally nuclear is not considered a clean fuel source due to risks associated with spent fuel and practical long-term disposal options.

Based on these factors, staff believes that VCE is better served by accepting the hydro allocation for 2024, but not the nuclear allocation. Staff did consult with The Energy Authority (TEA) regarding the potential monetary value of nuclear attributes and confirmed that is very low, if any.

In summary, the staff recommendation to the Board is:

1. Accept the 2024 allocation of large hydro carbon free attributes paid for by VCE customers;

2. Reject the 2024 allocation of nuclear power carbon free attributes;
3. Recommend the Executive Officer to enter into an agreement(s) with PG&E to accept only the Large Hydro portion of the 2024 GHG free allocations; and
4. In the event the future attributes are made available to VCE and there are no material changes in VCE's position, staff will continue to bring this item to the CAC and Board as part of their consent agendas.