

Submitter Name	Organization Name	Please provide your feedback on staff's recommended preferred portfolio selection for CleanPowerSF's 2020 IRP submission to the California Public Utilities Commission.	Given that CleanPowerSF will update its IRP every two years, what do you think the SFPUC's goals and priorities should be for CleanPowerSF and its ongoing energy resource planning work?	CleanPowerSF core program goals are affordability, environmental stewardship, local investment, and rate and financial stability. How should CleanPowerSF manage trade-offs between these goals?	Do you have thoughts or recommendations for improving our IRP process going forward?	Anything else you would like to share?
Daniel Tahara	N/A	Supportive of the preferred plan. I have a few questions about the new projects as well as the assumptions -- 1. what's the "additionality" of all the new projects? Would they have been built without CPSF's contract? If yes, then I would encourage us to try to find other projects to accelerate the addition of renewables to the grid. 2. SF seems poised to pass an all-electric new construction requirement to take effect in 2021. Given that, and given the need for electrification of existing buildings to meet our climate goals, how does that affect the costs and need?	Look at how to improve local resiliency from wildfires and rolling blackouts, which will be necessary in order to make folks comfortable with electrification. Whether that's batteries, local, distributed solar, etc we should be attempting to have a dispatchable source of emergency energy locally. Promoting BTM resources through rebates or other mechanisms will help with this.	Affordability for disadvantaged communities seems paramount, but for those who can afford it, advancing the clean energy transition (environment) and creating local jobs would be a good cause for slightly higher rates.  On the flip side, part of promoting electrification and gas-> electric retrofits is going to be demonstrating cost savings for consumers, so that would be countervailing against my previous statement.		
Jed Holtzman	350 Bay Area	<p>Thank you for the opportunity to comment on CleanPowerSF's 2020 Integrated Resource Plan. As both ratepayers and advocates for climate action, 350 Bay Area supports developing an integrated renewable energy system in the region and the state—to include conservation, energy efficiency, demand response, increasing penetration of affordable renewable energy, and resiliency through energy storage and micro/mini/nanogrids. We need to defend the ability of local communities to determine their energy future and to generate their own energy, and we also need to ensure that regulation of transmission and distribution is structured to incentivize conservation of resources, safety, and economically vibrant communities—rather than the current system, which incentivizes investment in unnecessary utility infrastructure associated with deadly fires and ships billions of dollars a year out of local communities and into shareholder pockets.</p> <p>The IRP may set up a bit of a straw man by assuming absolutely no purchases from CAISO from now through 2030 in the Time Coincident scenario. While completely eliminating the role of market purchases may result in an uneconomic outcome, surely</p>	We live amidst complete earthquake devastation at any given time and right in the middle of multiple firescapes, yet have never thought it might be a good idea to generate our own power? CleanPowerSF needs to focus on localized, decentralized energy generation; distribution grid management reform; renewable microgrid development; and green workforce development in disadvantaged communities.	How is it managing them now--is there a system or is it ad hoc? ANY discussion of affordability must quantify and monetize the very real costs/benefits to life, health, productivity, etc., of both pollution (on the negative side) and resiliency (on the positive side) in order to be based on legitimate estimates. Obviously paying a penny a day for a week and then having your house explode from natural gas is less worthwhile than paying a dollar a day in perpetuity and no explosion. By current SFPUC calculation, however, a dollar a day would be less "affordable."	Obviously, more than one week for people to read, digest, and comment on a 94-page report and several dozen slides is required to avoid a complete caricature of public engagement, which this has been. To the extent you plan on using IRPs as anything other than perfunctory filings to CPUC, then stakeholders should be involved in their development, as the city would do for basically any plan or policy.	

<p>Jenny Whitson (SF LAFCo Consultant)</p>	<p>San Francisco Local Agency Formation Commission</p>	<p>1. Confirm what percentage of the renewable energy portfolio will be located in the City before and after the development of the identified Planned Resources for the 38 MMT Preferred Portfolio and what percentage of the portfolio will be located in the nine-county Bay Area region.  2. The new build projects listed in Table 28 of the 2020 IRP do not align with the projects identified in the Local Renewable Energy Report, and it is unclear if there is overlap or if the new build projects are in addition to the ones identified in the Local Renewable Energy Report.  3. The IRP should describe if battery storage systems will support grid reliability (islanding, backup power, etc.), and confirm the total Megawatt Hours (MWh) for the energy storage projects.</p>	<p>1. The SF LAFCo strongly encourages CleanPowerSF to emphasize the importance of system reliability and the impacts of Public Safety Power Shutoffs (PSPS) in the IRP, particularly addressing vulnerable populations who rely on electricity for their mobility, eating, and breathing needs in addition to other critical facilities.  1. The SF LAFCo strongly encourages CleanPowerSF to prioritize the rollout of programs to support local project investment, particularly in disadvantaged and vulnerable communities.  2. The SF LAFCo recommends CleanPowerSF include a resiliency approach to their overall preferred portfolio and any systems and infrastructure the portfolio relies upon.</p>	<p>1. The SF LAFCo recommends including a timeline for implementing programs in development focused on disadvantaged communities.  2. The IRP should describe how CleanPowerSF is proactively addressing PG&amp;E’s Power Charge Indifference Adjustment (PCIA), including PG&amp;E’s Fee predictions and how PCIA rules may affect their costs and planned resources.  3. CleanPowerSF should describe how programs, such as a FiT (Feed-in Tariff) program, may impact the IRP and preferred portfolio.  4. The IRP Presentation Slide 7 states that one of the goals is to optimize a portfolio that achieves program goals and delivers competitively priced energy products however, it is unclear if the impact of policy, tax credits, and other subsidies were considered.</p>	<p>1. The SF LAFCo respectfully requests that CleanPowerSF publish a Draft IRP schedule for the 2022 IRP, including a milestone for engaging and consulting with internal and external stakeholders at least four months before the CPUC submission deadline. The SF LAFCo requests that CleanPowerSF ensure the next IRP planning process provides adequate time to solicit and incorporate stakeholder feedback and take into account local decision-making structures.</p>	<p>1. Due to the late release of the 2020 IRP Draft for public comment, the SF LAFCo will be submitting additional written feedback to CleanPowerSF for future discussions during SF LAFCo regular meetings. The SF LAFCo would like CleanPowerSF to confirm if they will be issuing an Addendum to the 2020 IRP and, if so, what their timeline for submitting will be.  2. The SF LAFCo respectfully requests to be notified by CleanPowerSF when the solicitation process begins for any of the identified planned resources noted in the IRP slated for early 2021. Additionally, the SF LAFCo requests CleanPowerSF provide SF LAFCo with copies of all draft and final solicitation documents in</p>
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Eric Brooks	Californians for Energy Choice, and, SF Clean Energy Advocates	<p>While impressive work was done by staff, the portfolios they have chosen are not the best foot forward. Instead the portfolio described by staff as the "Time Coincident Case" should be the portfolio chosen by the SFPUC. That portfolio alone begins to substantially build the infrastructure local clean energy advocates have insisted on for the last two decades - extensive and diverse *local* renewables, efficiency and storage, along with the *crucially* needed local jobs and community development which serve them (ideally funded by revenue bonds). This localized model is also essential to making San Francisco far more resilient from power outages, and making all of Northern California more fire resilient by reducing the need for dangerous and energy wasting long range transmission lines.</p>	<p>As advocates have maintained since 2005. The objective should be building out a planned and holistically integrated local and regional infrastructure which provides 100% greenhouse gas free *and* renewable electricity by 2030, creating thousands of local jobs. This network should further be planned to power all transportation used in San Francisco with 100% greenhouse gas free *and* renewable energy between 2030 and 2050 (the earlier the better). NOTE: The staff's chosen portfolios do not meet the City's goal set forward by both the Mayor and the Board of Supervisors, of 100% *renewable* electricity by 2030, and only reaches 100% GHG free by 2030 (a lower standard). See: <a href="https://sfenvironment.org/sites/default/files/flie rs/files/sfe_re_renewableenergytaskforcerecom mendationsreport.pdf">https://sfenvironment.org/sites/default/files/flie rs/files/sfe_re_renewableenergytaskforcerecom mendationsreport.pdf</a></p>	<p>CleanPowerSF can easily achieve all of these goals together by building a full, integrated, 100% renewable electricity infrastructure as a comprehensively planned countywide network, funded with revenue bond financing, instead of pursuing the incremental strategies proposed by staff, which will not achieve the economies of scale of a large planned countywide infrastructure purposely designed to achieve better economics, and energy use balancing and integration. The portfolios selected by staff are penny wise and pound foolish, only considering near term project by project economics, and do not consider at all the huge savings that could be achieved (especially by local businesses) through local resilience from power outages and fires that could be achieved by the Time Coincident Case.</p>	<p>The IRP should be centered on building a full, integrated, 100% renewable electricity infrastructure as a comprehensively planned countywide network, funded with revenue bond financing, instead of being centered on merely meeting goals over time, with a project by project approach. Sydney Australia has developed such a plan (see link) which is an excellent starting point for developing a similar plan for San Francisco. NOTE: If the 'biomass/waste' reliability components of the Sydney plan are replaced with a *battery storage* reliability strategy in San Francisco's plan, the City and County can fully meet its goal of 100% greenhouse gas free, renewable and pollution free electricity. See: <a href="http://www.cityofsydney.nsw">http://www.cityofsydney.nsw</a>.</p>	<p>While Power Enterprise and CleanPowerSF staff's work was excellent, its conclusion does not meet the needs of local resiliency, development, and jobs, nor does it meet the City's own stated goal of running on 100% *renewable* electricity by 2030. The staff's preferred portfolio seeks to get us to an attractive and more easily met, on paper procurement, of 100% greenhouse gas free electricity five years sooner and from more distant sources, while neglecting and delaying vital local development, resilience, and jobs that can be achieved through a 100% greenhouse gas free *and* renewable, integrated local and regional infrastructure by 2030. The Time Coincident Case, while not fully meeting that</p>
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Melissa Yu	Sierra Club SF Bay Chapter	<p>The Sierra Club is writing in support of CleanPowerSF’s draft 2020 Integrated Resource Plan (IRP). We are excited to see the accelerated path to 100% renewable energy by 2025.</p> <p>This past weekend's excruciating heat waves, devastating wildfires, and rolling blackouts have revealed, we need to accelerate clean energy actions. As Governor Gavin Newsom notes, the state “must do more and faster to prevent future outages as we continue to work to transform energy generation in our state to achieve our necessary goals to combat climate change”.</p> <p>The draft 2020 IRP aims to do just this while continuing to keep prices competitive to the incumbent utility. We applaud you for drafting a plan that balances affordability, a swift acceleration to renewable energy, and local investments.</p>	Local development in our community that will lead to good-paying jobs, a cleaner grid, and enhanced resilience.	Offer a diversified portfolio of local programs. Programs such as: demand response, energy efficiency, building electrification, transportation electrification, collaborative procurement, municipal feed-in tariff, community shared solar, and community net energy metering.		
Paul Wermer	Climate Reality Project Bay Area, San Francisco Policy Action Team	Based on the documents provided, as well as the very helpful Q&A sessions hosted by CleanPowerSF, we support the recommendation of the Accelerated Case as the preferred portfolio.	<p>Evaluate impact of all-electric retrofits: GHG reduction goals require retrofiting buildings to all electric. Scenario modeling is essential. Heat-pump space conditioning includes AC, so SF peak summer loads may increase with AC usage.</p> <p>Expand assessment of long-term storage: Electrochemical battery systems of all types are a rapidly evolving technology. Green Hydrogen – industrial/transportation demand driving costs down Liquid Air perhaps better than compressed air for long term storage.</p> <p>Resilience to PSPS and known risks – earthquakes, extreme weather, wildfire – both in SF as well as at generation/storage locations. While this may not be an IRP requirement, this is of interest to San Francisco residents, and may influence 2022 IRP evaluatio</p>	<p>A difficult question to answer in the abstract. There are synergies e.g. long term “affordability” requires “rate and financial stability”? Should these 2 issues to be considered together?</p> <p>Climate change crisis may require actions to ensure GHG reduction does not harm low income communities or cause ecosystem damage. Approaches such Spatial Planning for Low-Carbon Transitions (<a href="https://irp-cdn.multiscreensite.com/be6d1d56/files/uploaded/SDSN_DDPP_SpatialPlanning_GraceWu_final.pdf">https://irp-cdn.multiscreensite.com/be6d1d56/files/uploaded/SDSN_DDPP_SpatialPlanning_GraceWu_final.pdf</a>) should help avoid environmental pitfalls and related cost drivers.</p> <p>Local investment is challenging, especially for generation. Though additional local generation capacity is limited, local storage may be a significant opportunity, offering resilience improvements as well.</p>	Earlier outreach helping community members better understand the overall system and considerations would be great	<p>I really appreciate the outreach and office hours discussion – they are essential to help us understand the issues.</p> <p>It would be useful for CleanPower SF to advocate for improved energy efficiency projects in existing buildings, especially as part of decarbonization retrofits. This is a complex problem, and without clear guidelines, there is a risk of badly implemented projects causing significant indoor air quality and moisture retention problems. Unfortunately, most property owners, and apparently many contractors, are unaware of the issues.</p>

<p>Helena Birecki</p>	<p>San Francisco Climate Emergency Coalition</p>	<p>Based on the documents provided, and the very helpful Q&amp;A sessions hosted by CleanPower SF, we support the recommendation of the Accelerated Case as the preferred portfolio.</p>	<p>Evaluate the impact of all-electric retrofit scenarios, including the change in energy use with heat-pumps used as air conditioners as SF has more extremely hot days due to climate change.</p> <p>Expand assessment of long-term storage with evolving technologies including:          Electrochemical battery systems of all types;          Green Hydrogen-- for which the economics of generation and storage may become very favorable; and Liquid Air systems, being deployed today in the UK, in comparison to compressed air.</p> <p>Consider resilience-- for PSPS + earthquakes, extreme weather, wildfire etc-- both in the service area as well as affecting the generation/storage locations. This may not be an IRP requirement, but it's clearly of interest to SF residents, and may impact priorities that affect the IRP recommendations.</p>	<p>Great goals-- Consider the synergies here rather than just "manage trade-offs"</p> <p>Low income communities are affected first and worst by the climate emergency, environmental degradation, and cost. Search for truly equitable solutions should focus on all 3 issues.</p> <p>Cost of LCOE/LCOS already appears competitive with natural gas plants, so that trade-off no longer applies. Approaches like Spatial Planning for Low-Carbon Transitions (<a href="https://tinyurl.com/y4wbn9wy">https://tinyurl.com/y4wbn9wy</a>) should help avoid environmental pitfalls and related cost drivers. For resilience improvements, local generation capacity may be limited, but local investment in storage is a significant opportunity.</p> <p>Long term "affordability" requires "rate and financial stability," so it seems appropriate for these two issues to be considered together.</p>	<p>Earlier outreach to help community members better understand the overall system and considerations would be great.</p>	<p>Thank you for offering outreach and office hours discussion – they really helped us understand the issues.</p> <p>It would be useful for CleanPower SF to advocate for improved energy efficiency projects in existing buildings, especially as part of retrofits to all-electric. This is a complex problem, and without clear guidelines, there is a risk of badly implemented projects causing significant indoor air quality and moisture retention problems. Unfortunately, most property owners, and apparently many contractors, are unaware of the issues, so guidance from the City will be important</p>