

Memorandum

To: Chair David Hochschild
Commissioner Karen Douglas
Commissioner Andrew McAllister
Commissioner Patty Monahan
Commissioner Janea A. Scott

Date: June 19, 2020

From: Drew Bohan
Executive Director

Subject: APPROVAL OF AN IMPERIAL IRRIGATION DISTRICT EMISSION PERFORMANCE STANDARD COMPLIANCE FILING

On May 28, 2020, the Imperial Irrigation District (IID) submitted a compliance filing requesting the California Energy Commission (CEC) find that IID's covered procurement for geothermal energy from the GeoGenCo Project #501 geothermal power plant (Plant) be determined to be compliant with the CEC Greenhouse Gases Emission Performance Standard (EPS), pursuant to Title 20 of the California Code of Regulations, §2900, et seq.

Senate Bill 1368 (Perata, Chapter 598, Statutes of 2006) limits long-term investments in baseload generation by the state's utilities to power plants that meet an EPS jointly established by the CEC and the California Public Utilities Commission. The CO₂ emission rate limit is 1,100 pounds per megawatt-hour. The EPS establishes a public process for determining the compliance of proposed utility investments. Utilities are required to submit a compliance filing upon committing to an investment that is required to meet the EPS.

On May 19, 2020, IID's Board of Directors approved a power purchase agreement (PPA) with GeoGenCo Project #501, LLC. for a term of 30 years. The PPA calls for a total capacity of at least 15 megawatts from the proposed Plant and a commercial operation date not earlier than June 15, 2022. The PPA requires the Plant to be certified by the CEC as renewable under the Renewable Portfolio Standard. Should the Plant fail certification, IID can terminate the PPA without penalty. The PPA further specifies the seller to warrant and guarantee the Plant will retain its RPS certification and compliance with EPS for the duration of the contract term.

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Page Two

Staff has evaluated IID's compliance filing and concludes that the PPA is compliant with the EPS pursuant to §2903(b)(1); specifically, that the geothermal facility listed in the PPA meets the criteria of a renewable electricity generation facility as defined in Chapter 8.6 of Division 15 of the Public Resources Code and as such is determined to be compliant with the EPS. Staff recommends the CEC find that the covered procurement as described in IID's filing complies with the CEC's EPS, Title 20, §2900 et seq., of the California Code of Regulations.

Original Signed by:

Drew Bohan
Executive Director

June 19, 2020
Date

July 8, 2020 California Energy Commission Business Meeting.
Item 1a. IMPERIAL IRRIGATION DISTRICT.

**[SB 1368 Emission Performance Standards Compliance Filing for the
Amended and Restated Power Purchase Agreement with GeoGenCo Project #501,
LLC](https://efiling.energy.ca.gov/getdocument.aspx?tn=233189)**

<https://efiling.energy.ca.gov/getdocument.aspx?tn=233189>

STATE OF CALIFORNIA

STATE ENERGY RESOURCES
CONSERVATION AND DEVELOPMENT COMMISSION

IN THE MATTER OF:

*Imperial Irrigation District
Emission Performance Standard
Compliance Filing*

Docket No. 20-EPS-01

I. INTRODUCTION

Pursuant to Public Utilities Code section 8341(e)(1), the California Energy Commission (CEC) established a greenhouse gases emission performance standard (EPS) of 1,100 pounds carbon dioxide per megawatt hour, as codified in Title 20 of the California Code of Regulations, section 2900 et seq. The CEC is responsible for reviewing all long-term financial commitments entered into by local publicly owned electric utilities for compliance with the EPS.

II. FINDINGS

- a. On May 28, 2020, the Imperial Irrigation District (IID) submitted a compliance filing requesting that the CEC find that IID's Power Purchase Agreement with GeoGenCo Project #501, LLC. for electricity from the GeoGenCo Project #501 geothermal power plant be determined to be compliant with the EPS;
- b. CEC staff reviewed IID's filing and found it complete. Based on its review, staff recommended that the procurement be found to be in compliance with the EPS; specifically, staff concluded that the facility listed in the PPA is determined to be compliant with the EPS under section 2903(b)(1) of the Public Resources Code; and
- c. The CEC concurs with staff's recommendation that IID's compliance filing is complete and that the contract with GeoGenCo Project #501, LLC, as described in the compliance filing, complies with the EPS.

III. CONCLUSION AND ORDER

The CEC hereby adopts staff's recommendation and orders that the long-term financial commitment described in IID's compliance filing complies with the CEC's Greenhouse Gases Emission Performance Standard, as codified in Title 20 of the California Code of Regulations, section 2900 et seq. Should the final facility design significantly change

from the specifications provided in the compliance filing, IID must submit a subsequent compliance filing providing the updated information.

CERTIFICATION

The undersigned Secretariat to the CEC does hereby certify that the foregoing is a full, true, and correct copy of an Order duly and regularly adopted at a meeting of the CEC held on July 8, 2020.

AYE:

NAY:

ABSENT:

ABSTAIN:

Cody Goldthrite
Secretariat