

Open Letter to Irvine City Council: Time Will Not Fix OCPA

Footnotes

[1] “Meet or exceed” resource adequacy was a condition of OCPA’s business launch, first stated on page 18, paragraph 2 of its December 28, 2020 Implementation Plan and Statement of Intent, and again in its December 21, 2021 Implementation Plan and Statement of Intent, Amendment No. 1, also on page 18, paragraph 2.

[2] November 1, 2021 OCPA filed a waiver request for its 2022 year-ahead local Resource Adequacy with the California Public Utilities Commission.

[3] Full accounting of OCPA’s energy may be achieved by juxtaposing: (i) all energy sales invoices; (ii) all energy procurement invoices; (iii) all investor-owned voluntary allocation and market offers (including associated proforma contract (or associated modified contract) identifying delivered RECs), plus a hold-harmless letter allowing the respective Investor Owned Utility to fully communicate with auditors; (iv) all power purchase agreements; (v) all confirmation agreements; (vi) all CAISO Settlement Statements; (vii) all NERC e-Tags; (viii) all raw worksheets used in preparation for California Energy Commission’s power source disclosures; (ix) all WREGIS logs identifying all REC activity. Additionally, this writer would ask for (x) all emails between OCPA and Pacific Energy Advisors; (xi) all emails between Pacific Energy Advisors and (a) Best Best Krieger LLP, (b) Shell Energy North America, (c) Morgan Stanley, and (d) OCPA’s Scheduling Coordinator(s).

[4] December 21, 2021 OCPA board meeting, elapsed time 16:30. <https://vimeo.com/662129739/e88f43f242>. OCPA Director Farrah Khan: “On page 24, in the last paragraph there is mention of renewable energy credits, and again this is something that we just want to avoid. I’m not in favor of bundling energy credits at all, so I want to make sure that we are careful to avoid that.”