



Adrian Bankhead &lt;abankhead@avaenergy.org&gt;

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## 2022 Power Content Label comparisons

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Tom Kelly <tkelly@kyotousa.org>  
To: Adrian Bankhead <abankhead@ebce.org>

Mon, Oct 30, 2023 at 5:16 PM

Dear Adrian,

Please provide the Executive Committee with this email and attachment prior to the ExComm's meeting on Wednesday. Thank you.

Tom Kelly

Dear Members of the AVA Executive Committee,

I listened with interest to the presentation EBCE staff made on the Power Content Label at the last Board meeting. I heard CEO Chaset clearly state that the Board should direct the staff to make the changes in power content that they think are appropriate. This statement to the Board has been made previously. It is clear that he is asking the Board to direct staff to make changes in the power content of Bright Choice.

I am attaching a different view on the CCA Comparison chart that staff provided at the October Board meeting. Rather than rank the CCAs by "RPS" content, I've switched it to show the rankings by GHG content. You will see that 5 of the best 6 CCAs on GHGs do not have nuclear in their power mix. That should put to rest the claim that EBCE's GHG content is the result of the Board's decision not to take the nuclear allocation. Also note that PG&E's renewables (and those of the top 5 CCAs) are primarily PCC-1, while EBCE's are a combination of PCC-1 and PCC-2. PCC-2 renewables do not put Californians to work which was another important reason for the formation of EBCE.

I was also pleased to see that Redwood Coast moved up significantly in the rankings from #13 in 2021 to #4 in 2022. Granted, Redwood Coast is a small CCA, but it is buying power in the same markets as EBCE. They went from 33% renewable and 56% "unspecified" in 2021 to 50% renewable and 5% unspecified in 2022. Quite a remarkable achievement that demonstrates that a CCA can make significant changes in its power content in a short period of time.

Please also look at the "notes" on the spreadsheet. You'll see that 2 CCAs will be 100% renewable by 2030 (not 100% carbon free) and that PCE plans to be 100% renewable by 2025 on a 24/7 basis.

PCE is an interesting case study. PCE has essentially been 100% carbon free since its inception. It is about half the size of EBCE in terms of total accounts and overall electricity load. Nevertheless, PCE's latest financials show that net reserves are at \$266M (1st quarter 2023) while EBCE's are at \$324M for the same reporting period. The point I'd like to make here is that PCE is the cleanest CCA in northern CA and is in a very strong financial position. Note too, that PCE launched about a year before EBCE.

One other item caught my attention recently. The US EPA is proposing to increase the "social cost of carbon" (<https://www.nrdc.org/bio/mohit-chhabra/epa-finds-higher-benefits-curbing-climate-change>) to \$190/ton. It's currently \$40/ton. If there were a legal requirement to pay for the CO2 generated by EBCE (299,000 metric tons in 2021) at the proposed new rate, EBCE would owe nearly \$57M, a sum undoubtedly lower than what it would cost to eliminate EBCE's carbon emissions entirely.

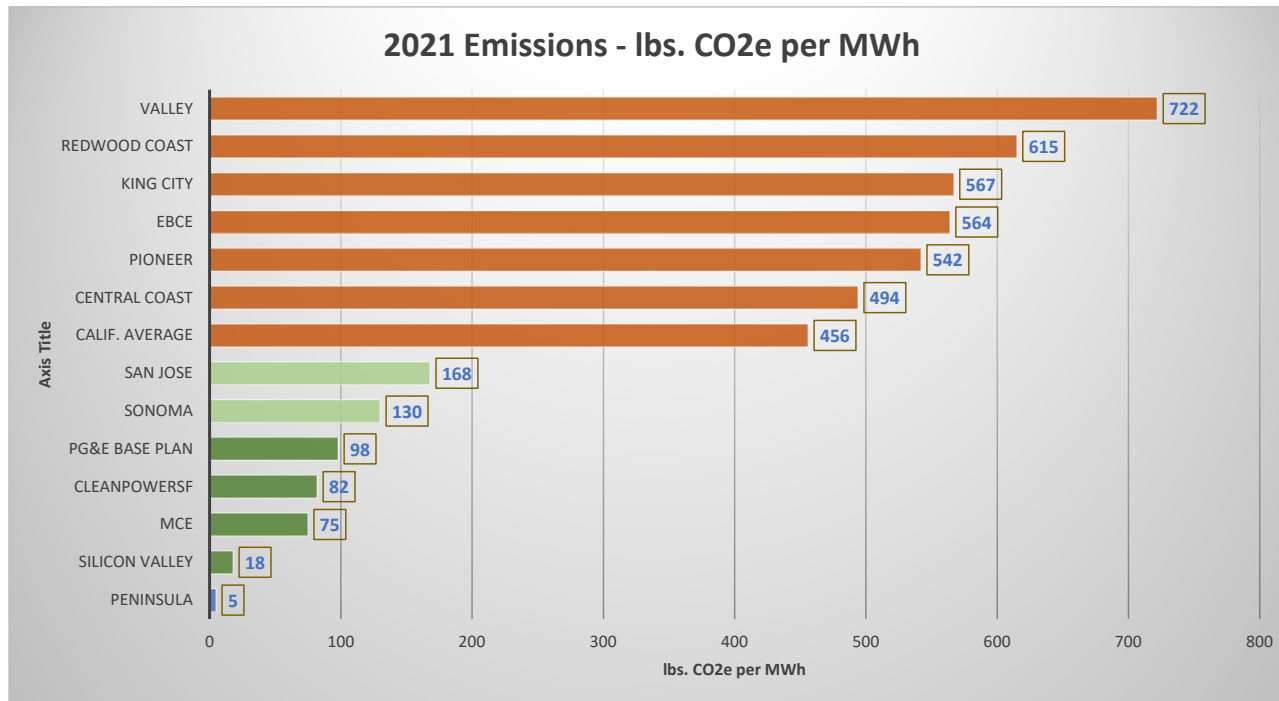
I hope this is helpful. Please let me know if you have questions. All the best!

Tom Kelly  
Berkeley



2020-2021-2022 PCL comparisons.xlsx  
24K

2020 RANK	2021 RANK	Load Serving Entity	Lbs CO2e per MWh	% Renewable	% Unspecified	% Nat. Gas	% Large Hydro	% Nuclear	% Other	% Unbundled RECs
2	1	Peninsula	5	49.20%	0.00%	0.00%	50.80%	0.00%	0.10%	0.00%
1	2	Silicon Valley	18	44.10%	0.00%	0.00%	35.90%	20.00%	0.00%	0.00%
4	3	MCE	75	60.50%	1.70%	0.00%	36.80%	0.90%	0.10%	0.00%
3	4	CleanPowerSF	82	55.40%	6.90%	0.00%	37.60%	0.10%	0.00%	0.00%
7	5	PG&E BASE PLAN	98	47.70%	0.00%	8.90%	4.00%	39.30%	0.00%	2.00%
5	6	Sonoma	130	49.70%	9.20%	0.00%	40.60%	0.50%	0.00%	0.00%
8	7	San Jose	168	36.00%	1.30%	0.00%	31.30%	31.30%	0.00%	0.00%
11	8	CALIF. AVERAGE	456	33.60%	6.80%	37.90%	9.20%	9.30%	0.20%	NA
6	9	Central Coast	494	38.40%	49.80%	0.00%	11.80%	0.00%	0.00%	0.00%
14	10	Pioneer	542	30.80%	48.40%	0.00%	0.40%	20.40%	0.00%	5.00%
13	11	EBCE	564	42.30%	40.00%	0.00%	15.90%	1.70%	0.10%	0.00%
12	12	King City	567	40.00%	60.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	13	Redwood Coast	615	33.10%	56.40%	0.00%	10.50%	0.00%	0.00%	0.00%
9	14	Valley	722	12.60%	76.50%	0.00%	10.90%	0.00%	0.00%	0.00%



<u>2020</u> RANK	<u>2021</u> RANK	<u>2022</u> Rank	<u>Load Serving Entity</u>	<u>Lbs CO2e</u> per MWh	<u>%</u> <u>Renewable</u>	<u>%</u> <u>Unspecified</u>	<u>% Nat.</u> <u>Gas</u>	<u>% Large</u> <u>Hydro</u>	<u>%</u> <u>Nuclear</u>	<u>%</u> <u>Other</u>
2	1	1	Peninsula Clean Energy	9	51.80%	0.00%	0.00%	48.20%	0.00%	0.00%
4	3	2	MCE	44	59.60%	0.50%	0.00%	39.50%	0.40%	0.00%
3	4	3	CleanPowerSF	47	59.90%	2.90%	0.00%	37.20%	0.00%	0.00%
10	13	4	Redwood Coast	49	50.00%	5.00%	0.00%	45.00%	0.00%	0.00%
7	5	5	PG&E BASE PLAN	56	38.30%	0.00%	4.80%	7.60%	49.30%	0.00%
1	2	6	Silicon Valley	72	44.90%	0.00%	0.00%	30.80%	24.30%	0.00%
5	6	7	Sonoma Clean Power	112	50.30%	8.70%	0.00%	40.00%	0.90%	0.10%
8	7	8	San Jose Clean Energy	116	59.20%	8.60%	0.00%	7.40%	24.80%	0.00%
14	10	9	Pioneer	343	44.10%	27.00%	0.00%	1.30%	27.60%	0.00%
11	8	10	CALIF. AVERAGE	422	35.80%	7.10%	36.40%	9.20%	9.20%	2.20%
13	11	11	EBCE	496	49.40%	28.40%	0.00%	21.90%	0.20%	0.10%
12	12	12	King City	580	38.50%	61.50%	0.00%	0.00%	0.00%	0.00%
6	9	13	Central Coast	637	35.80%	58.30%	0.00%	5.90%	0.00%	0.00%
9	14	14	Valley	709	17.50%	75.10%	0.00%	7.40%	0.00%	0.00%

**Notes:**

EBCE will be 100% carbon free by 2030

Redwood Coast will be 100% renewable by 2030.

Peninsula Clean Energy will be 100% renewable - 24/7 - by 2025.

Valley Clean Energy is committed to 100% renewable by 2030.

<b>2020</b>						
<b>RANK</b>	<b>Load Serving Entity</b>	<b>Lbs CO2e per MWh</b>	<b>% Unspecified</b>	<b>% Nat. Gas</b>	<b>% Other</b>	<b>% Unbundled RECs</b>
1	Silicon Valley	7	0.20%	0.00%	0.30%	0.00%
2	Peninsula	13	0.40%	0.00%	0.10%	0.00%
3	CleanPowerSF	40	3.50%	0.00%	0.00%	0.00%
4	MCE	77	1.10%	0.00%	0.20%	0.00%
5	Sonoma	80	7.20%	0.00%	0.00%	0.00%
6	Central Coast	151	13.20%	0.00%	0.00%	0.00%
7	PG&E BASE PLAN	160	0.00%	16.40%	0.00%	2.00%
8	San Jose	178	10.50%	0.10%	0.40%	0.00%
9	Valley	190	19.60%	0.00%	0.00%	0.00%
10	Redwood Coast	447	26.30%	0.30%	0.70%	0.00%
11	CALIF. AVERAGE	466	5.40%	37.10%	0.20%	NA
12	King City	486	0.00%	0.00%	0.00%	8.00%
13	East Bay	591	44.70%	0.10%	0.20%	0.00%
14	Pioneer	603	55.90%	0.00%	0.00%	2.00%