# Senior Executive Attestation

Compliance Filing for LSEs Electing to **Self-Provide** the Integrated Resource Planning Procurement Required by D. 19-11-016

August 28, 2020

CA Public Utilities Commission (CPUC)
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102-3298

*Re: September 1, 2020, Individual Integrated Resource Plan Senior Executive Attestation Pursuant to Decision (D). 19-11-016 adopted in R. 16-02-007*

Pursuant to Ordering Paragraph (O.P.) 12 of Decision (D.) 19-11-016, adopted in R.16-02-007 on November 5, 2019, Lancaster Choice Energy submits this attestation.

## Background

D.19-11-016 requires that all Load Serving Entities (LSEs) file their individual integrated resource (IRP) plans by May 1, 2020 [*revised to September 1, 2020*][1]. The decision also requires that all LSEs directed in the Decision shall present in their IRP plans an attestation from a senior executive in the company that the necessary capacity required in this Decision shall be provided if the LSE is electing to self-provide the capacity required.[2] This Decision states that the attestation shall be accompanied by a detailed list of projects, capacities, and dates by which the LSE expects the projects to be providing service to the LSE, as well as a demonstration that the projects are incremental, to meet the 2021, 2022, and 2023 requirements of the decision.

## Resource Data Template

The Resource Data Template to be used for the September 1, 2020, IRP filing has been developed to identify the required information in O.P. 12 D.19-11-016; consequently, this attestation refers to the template contents to obviate the need for a separate compliance document. The "Certification of Information" section at the bottom of this attestation refers to the specific data fields in the Resource Data Template referenced in Table 1 below, which map to the requirements in O.P. 12 of D.19-11-016.

Table 1
Resource Data Template Reliability Procurement Fields Related to O.P. 12, D.19-11-016

| O.P. 12 Requirement | Corresponding Field in Resource Data Template |
|---|---|
| Detailed List of Projects | "Monthly_GWH_MW" tab; Columns B, C, & K |
| Capacities | "Monthly_GWH_MW" tab; Columns F, G, & H |
| Dates by which LSE expects projects to be providing service to LSE | "Unique Contracts" tab; Columns G, H, & I |
| Demonstration projects are incremental | "Unique Contracts" tab; Columns M & N |

[1] Decision (D.)20-03-028 modified the filing date from May 1, 2020 to September 1, 2020 at page 67.
[2] The LSEs directed in the Decision are named in OP 3 and by CPUC staff as discussed in OP 4.

## Attestation Requirements

To satisfy the requirements in O.P. 12 of D. 19-11-016, a senior executive shall sign the "Certification of Information" section below and submit this attestation as part of their compliance filing in the IRP Proceeding by September 1, 2020. No additional documentation is required at this time.

## Certification of Information

Consistent with Rules 1 and 2.4 of the CPUC's Rules of Practice and Procedure, the individual IRP compliance filing has been verified by a senior executive who shall expressly certify, under penalty of perjury, the following:

(1) The necessary incremental Resource Adequacy capacity required of Lancaster Choice Energy in Decision (D.) 19-11-016 shall be provided in compliance with the terms established in D.19-11-016 and January 3, 2020, ruling finalizing baseline resources.

(2) I have reviewed the Resource Data Template data fields referenced in Table 1 above (and any information provided to meet Milestone 1 of the backstop mechanism proposed in the June 5, 2020, Backstop Procurement and Cost Allocation Mechanisms Ruling) submitted in my company's individual IRP compliance filing in the IRP Proceeding.

(3) Based on my knowledge, information or belief, the compliance filing information referenced in (2) above is an accurate reflection of the LSE's plans to self-provide its obligation of the incremental Resource Adequacy capacity and the terms identified in D.19-11-016, and does not contain any untrue statement of a material fact or data or omit to state a material fact or data necessary to make the statements true.

(4) Based on my knowledge, information, or belief, the compliance filing information referenced in (2) above contains all of the information required to be provided by CPUC orders, rules, and regulations.

## Senior Executive Signature:

Cathy DeFalco
Name

General Manager, California Choice Energy Authority,
On behalf of Lancaster Choice Energy
Title

Cathy DeFalco
Signature

8/28/20
Date