

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



June 28, 2021

Advice Letter 5882-E & 5882-E-A

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

**SUBJECT: PG&E's Plans to Conduct Semi-Annual Public Safety Power Shutoffs (PSPS)
Grid Resiliency Workshops in Compliance with D.20-06-017.**

Dear Mr. Jacobson:

Advice Letter 5882-E & 5882-E-A is effective as of June 24, 2021, per resolution E-5144
Ordering Paragraphs.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

July 17, 2020

Advice 5882-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: PG&E's Plans to Conduct Semi-Annual Public Safety Power Shutoffs (PSPS) Grid Resiliency Workshops in Compliance with D.20-06-017

I. Purpose

Pacific Gas and Electric Company (PG&E) hereby submits this Tier 2 Advice Letter ("AL") in compliance with the California Public Utilities Commission ("CPUC" or "Commission") Decision ("D.") 20-06-017 ("Decision") Ordering Paragraph ("OP") 7. The AL demonstrates PG&E's compliance with Section 4.3.2.1 to show how it plans to conduct semi-annual workshops designed to, among other things, help empower local and tribal jurisdictions with a better understanding of grid operations, utility infrastructure, and the nature of weather events alongside PSPS mitigation initiatives.

II. Background

The Commission initiated Rulemaking ("R.") 19-09-009 to develop a policy framework surrounding the commercialization of microgrids and related resiliency strategies and to implement Senate Bill (SB) 1339 (Stern, 2018).

On December 20, 2019 the assigned Commissioner's Scoping Memo and Ruling was issued, adopting a scope and schedule for Track 1 of the proceeding. Track 1 addressed deploying resiliency planning in areas that are prone to outage events and wildfires, with the goal of establishing key microgrid and resiliency strategies as soon as possible. Subsequently, on January 21, 2020, Administrative Law Judge Rizzo issued a Ruling with Energy Division staff's ("Staff's") proposal on short-term actions related to microgrids and other resiliency strategies that could be initiated in early 2020 to reduce the impact of public safety power shutoff ("PSPS") outages or other catastrophic events.

On June 11, 2020, the Commission adopted D.20-06-017, which approves certain Staff proposals for information sharing with local and tribal governments. This Advice Letter

addresses the requirements included in Ordering Paragraph 7 of D.20-06-017, which requires:

Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit a Tier 2 Advice Letter within 30 days of the date of issuance of this decision, that document their plans to conduct semi-annual workshops designed to help empower local and tribal jurisdictions with a better understanding of grid operations, utility infrastructure, and the nature of weather events alongside utilities' Public Safety Power Shutoff (PSPS) mitigation initiatives in order to make informed decisions on where to focus their resiliency planning efforts, capital investments, and pre-PSPS event operations consistent with Section 4.3.2.1 of this decision. This Advice Letter should specifically address how the utilities plan to develop and ensure that effective internal communication processes exist for managing interface with local and tribal government by enumerating how they will achieve the outcomes below:

- a) Designating utility interface roles and responsibilities;*
- b) Managing engagement with local and tribal government and building and sustaining effective relationships;*
- c) Establishing and maintaining open, accurate, and consistent lines of communication;*
- d) Involving local and tribal government in planning and vetting of utility actions impacting local and tribal government; and*
- e) Executing [and follow-through] on agreements impacting local and tribal governments*

Additionally, in this advice letter filing, the utilities are directed to include draft agendas for local and tribal government engagement meetings and discuss how they plan to meet the specific content requirements of the workshops through examples of draft agenda items. Agenda items shall include, but not be limited to:

- a) Explanations of how the electric transmission system and distribution system operates in the area;*
- b) Explanations of local grid topology and circuit configuration;*
- c) Informing local and tribal governments about electric transmission and distribution infrastructure investment and operational plans;*
- d) Discussion and visualization for context purposes of prior PSPS events;*
- e) Weather and climatology analysis predictions for anticipated PSPS events;*
- f) Case studies of outage scenarios a county is likely to experience based on predictable weather events;*
- g) Granular, local reporting of reliability statistics; and*
- h) How the utility plans to incorporate and reflect community and local and tribal government input*

Furthermore, the utilities shall use these Advice Letter filings to explain how they plan to coordinate the collaborative planning session about enhancing grid resilience within the local and tribal government area (i.e., a county). This explanation should include how this planning session will achieve the following:

- a) Outreach to county office of emergency services or other, similar government organizations responsible for implementing the State Emergency Plan;*
- b) Moderated by county office of emergency services administrator, or other similar government organization, (unless administrator specifically declines invitation to do so, and either designates another government organization or has the utility moderate);*
- c) Outreach to community and tribal organizations, including representation of disadvantaged communities and access and functional needs populations;*
- d) Incorporate relevant elements of a community-based collaborative planning framework as suggested by the Energy Division Staff Proposal (i.e., as the National Institute of Standards and Technology Community Resilience Planning Guide or its Resilient Communities Toolkit); and*
- e) Based on best practices such as San Diego Gas & Electric Company's community engagement.*

The utilities shall use this Advice Letter to discuss how they intend to coordinate and harmonize these workshops with existing requirements and how they could incorporate Public Utilities Code Section 956.5-type parameters to implement the requirements of this decision. The utilities shall discuss how they plan to effectuate the following requirements:

- a) Public Safety Power Shutoff working group meetings, as required by Rulemaking 18-12-005 and any subsequent requirements arising from that proceeding;*
- b) Disaster response plan requirements pursuant to General Order (GO) 166;*
- c) Annual reliability reporting obligations pursuant to Decision 16-01-008 and Public Utilities Code Section 2774.1; and*
- d) Land use consultation requirements as laid out in GO 131-D, Section XIV.*

PG&E submits this Tier 2 Advice Letter in compliance with Ordering Paragraph 7 of D.20-06-017.

III. Description of Plans for the Semi-Annual Workshops

A. Ensuring Effective Internal Communication Processes

Ordering Paragraph 7 of D.20-06-017 requires PG&E to address how it plans to develop and ensure that effective internal communication processes exist for managing interface with local and tribal governments and to enumerate how PG&E will achieve each of the following outcomes:

1. Designating utility interface roles and responsibilities

PG&E has several uniquely qualified groups of external engagement representatives assigned to specific regions and agency types within PG&E's service territory to manage outreach. Below is an outline of the different types of PG&E representative groups and their corresponding stakeholder coordination role:

- **Public Safety Specialists (PSS)** who coordinate with County OES and local first responders on emergency response items associated with electric and gas facilities, including county emergency management.
- **Local Public Affairs (LPA) Representatives** who are responsible for engaging with local elected officials and staff, including city emergency management.
- **Tribal Liaisons** who are responsible for engaging with tribal officials and staff, including tribal emergency management.
- **Division Leadership Team Leaders (DLT)** who coordinate cross-functionally with all PG&E programs to ensure local alignment within their assigned division.

2. Managing engagement with local and tribal government and building and sustaining effective relationships

With clear roles and responsibilities between each PG&E representative, key stakeholders within local and tribal governments have a single point of contact that can answer questions and address unique, local issues. With this framework, the PG&E representatives can build and sustain effective relationships with respective stakeholders.

The PG&E representatives coordinate with their respective stakeholders through a variety of outreach channels, including but not limited to, one-on-one meetings, trainings, phone calls, emails and community meetings. Through this outreach, the company solicits feedback and input on program plans and works to execute agreements with agencies for work within their jurisdiction.

The PG&E representatives listed above will be the same representatives that are tasked with conducting outreach to local and tribal governments, as well community

organizations, to participate in semi-annual resiliency workshops. While these groups will conduct outreach and provide information to agencies, additional PG&E subject matter experts will be invited to participate in the workshops to support information sharing and situational awareness.

3. Establishing and maintaining open, accurate, and consistent lines of communication

As part of PG&E's internal communication processes, representatives that manage relationships with agencies in the same region meet and coordinate regularly to help ensure accurate and consistent information is provided to their respective stakeholders.

4. Involving local and tribal government in planning and vetting of utility actions impacting local and tribal government

PG&E has initiated a number of programs and workstreams since 2018 that share the goal of improving our PSPS program by reducing the number of customers affected and the amount of time those customers will be without power in any future events. These include a variety of system hardening/reconfiguration efforts (e.g., adding reclosers and hardening infrastructure like lines and poles) and resilience efforts (e.g., microgrids, backup power support and Community Resource Centers), among others.

As part of our outreach following the 2019 PSPS events, PG&E hosted 36 listening sessions with local agencies impacted by the events to help identify areas for improvement and additional coordination opportunities. Following these sessions, as of July 15, PG&E has held working sessions with local agencies, public safety partners and other local key stakeholders in 29 counties to provide them with updates on PSPS related work and process improvements as they relate to their respective communities. Included in these meetings has been updates on local resiliency efforts like microgrids and substation backup generation. Additionally, PG&E has communicated to local agencies about planned resiliency efforts like microgrids at key project intervals (i.e. site identification, project design, construction and completion), when appropriate, to allow for local coordination.

Through our new Community Microgrid Enablement Program (CMEP), which is currently under development, PG&E also plans to leverage additional dedicated staff to help agencies navigate through establishing their own resiliency projects. As resiliency projects can be complex, this support will aim to help local and tribal governments identify which efforts may be the right fit for their community and what tools are available to them to help execute a project.

5. Executing and follow-through on agreements impacting local and tribal governments

Local and tribal governments will continue to be encouraged to coordinate with their assigned Public Safety Specialist, Local Public Affairs or Tribal Liaison representatives to track progress of PG&E work in their jurisdiction.

B. Workshop Content and Draft Agendas

PG&E representatives will host two semi-annual workshops utilizing the PSPS Regional Working Groups established as part of Rulemaking 18-12-005.¹ One workshop will be to review PG&E's electric infrastructure and planned electric system upgrades. The second workshop will be utilized to review PSPS criteria, provide an update on electric system upgrades and potential PSPS impacts. These workshops will be the main topic for the PSPS Regional Working Group meeting twice annually for each region and the information will be region-specific.

The regional working groups are divided into five regions: North Coast, Northeast, Bay Area, Central Coast and Central Valley. The stakeholders include small multi-jurisdictional electric utilities, community choice aggregators (CCAs), publicly owned electric utilities, communications and water service providers, CPUC staff, tribal and local government entities, public safety partners and representatives of people/communities with access and functional needs and vulnerable communities. In addition to the stakeholders listed above, PG&E will ensure those invited to the working group sessions featuring microgrid workshops include the CCAs within the region.

PG&E representatives will also coordinate with the County OES' within each region and extend the opportunity for one County OES representative to moderate the collaborative planning session portion of the workshop. In the case that no County OES accepts the moderating role, PG&E representatives will assume the role of moderator.

Additionally, PG&E will notify CPUC Energy Division Staff at least one month in advance of upcoming workshops and provide attendees with presentations/other meeting materials at least twenty-four hours in advance of the meeting. PG&E will also submit after meeting reports to ensure the following goals and outcomes were achieved at each meeting:

- Local and tribal government inputs were considered when planning resiliency measures
- Current resiliency and hardening projects plans/active project statuses were shared

¹ See D.20-06-017, p. 50 ("These face-to-face workshops to educate local jurisdictions in utility territory should be coordinated with PSPS working group meetings required in R.18-12-005.").

- Data was made available to local and tribal governments about projects and efforts
- Technical staff were made available to answer questions and engage with local and tribal governments

Given the ongoing COVID-19 pandemic, PG&E will for the time being coordinate digital workshops until such time as it is safe to host the semi-annual workshops in-person.

The following are sample draft agendas for each workshop:

PG&E Electric Grid System Overview Agenda (Workshop 1)

- i. Overview of Electric Transmission and Distribution Systems in the Area
- ii. Flyover of Electric Grid Using GIS Mapping Technology
 - a. Review of Transmission Infrastructure and Where Local Power is Produced/Originates
 - b. Identify Where Substations Are Located
 - c. Review Local Grid Topology and Circuit Configurations
- iii. Discussion and Visualization of Prior PSPS events
 - a. Maps of prior impacts
- iv. Review Upcoming/Ongoing Electric Transmission and Distribution Infrastructure Investment for Resilience and Operational Plans
 - a. System Hardening
 - b. Sectionalizing
 - c. Microgrids, Distributed Generation, Backup Generation
 - d. Other
- v. Collaborative Enhancing Grid Resilience Planning Session²
 - a. Discuss Local Goals/Areas of Concern – Lead By County OES'
 - b. Implementation of the State Emergency Plan
 - c. Incorporation of Relevant Elements of a Community-Based Collaborative Planning Framework
 - d. Discussion of Best Practices from Other Investor-Owned Utility (IOU) Service Areas
 - e. How PG&E plans to Incorporate and Reflect Community and Local and Tribal Government Input
- vi. Q&A

² D.20-016-017, p 48, requires the workshops conclude with a collaborative planning session about enhancing grid resilience within subject counties, in and across all local and tribal government agency jurisdictions.

PG&E PSPS Overview Agenda (Workshop 2)

- i. PSPS Overview and Criteria
 - a. Red Flag Warning
 - b. Low Humidity Levels
 - c. Forecasted Sustained Winds and Wind Gusts
 - d. Condition of Dry Fuel
 - e. On-the-Ground, Real-Time Observations
- ii. PSPS Planning Map Using GIS Mapping Technology
 - a. Weather and Climatology Analysis Predictions for Anticipated PSPS Events in the Area
 - b. Case Studies of Likely Local Outage Scenarios Based on Predictable Weather Events (Review 30-Year Weather Analysis)
- iii. Granular, Local Reliability Statistics
- iv. Update on Upcoming/Ongoing Transmission and Distribution Infrastructure Investment for Resilience and Operational Plans
 - a. System Hardening
 - b. Sectionalizing
 - c. Microgrids, Distributed Generation, Backup Generation
 - d. Other
- v. Collaborative Enhancing Grid Resilience Planning Session
 - a. Discuss Local Goals/Areas of Concern – Lead By County OES
 - b. Implementation of the State Emergency Plan
 - c. Incorporation of Relevant Elements of a Community-Based Collaborative Planning Framework
 - d. Discussion of Best Practices from Other Investor-Owned Utility (IOU) Service Areas
 - e. How PG&E plans to Incorporate and Reflect Community and Local and Tribal Government Input
- vi. Q&A/Follow Up from Previous Workshop

PG&E will incorporate the feedback gathered during these workshops into project plans, as appropriate. The workshops will also provide agencies with the opportunity to inform their own decisions regarding resiliency efforts through detailed coordination.

C. Collaborative Planning Sessions on Enhancing Grid Resilience

At the end of each workshop, PG&E representatives in partnership with attending County OES' will lead a collaborative planning session with all attendees that will include an opportunity for agencies to discuss local goals and areas of concern and for all parties to provide an update on local resiliency projects (e.g., microgrid proposals pursuant to

PG&E's Community Microgrid Enablement Program (CMEP)) the community has planned.

This segment of the meeting will also include coordination regarding the implementation of the State Emergency Plan, the implementation of the Energy Division Staff Proposal to incorporate relevant elements of a community-based collaborative planning framework, best practices being developed by other IOUs, and how the input from the planning session will inform PG&E's plans, as appropriate.

D. Coordination of Workshops with Existing Outreach Requirements

Due to COVID-19 and other factors, PG&E recognizes that local and tribal governments have limited availability to meet on PG&E's various programs. In an effort to streamline and consolidate meetings, PG&E will utilize the PSPS Regional Working Groups, as required by Rulemaking 18-12-005, to discuss the electric grid, microgrid projects and the other topics required by D.20-06-017. As appropriate, PG&E will also use these workshops to:

- 1) Provide County OES representatives an update on PG&E's plans for conducting its annual disaster response exercise as required by General Order (GO) 166 and where it can access PG&E's annual emergency response plan;
- 2) Provide granular, local reliability data (e.g., SAIDI, CAIDI, SAIFI) by PG&E division and at circuit-level to compliment the requirements in Decision 16-01-008 and Public Utilities Code Section 2774.1;³ and
- 3) Provide meeting attendees an update on the timing for planned land use consultation requirements as laid out in GO 131-D, Section XIV. With regard to land use consultation updates, PG&E intends to focus on those resiliency-related projects in the relevant district that would require a submission (either a CPCN or PTC application, or an advice letter providing a notice of construction) pursuant to GO 131-D.

Finally, PG&E will use the workshops to inform the participants of other relevant emergency planning meetings.

³ For an example of the type of information that would be communicated, please see: https://www.pge.com/pge_global/common/pdfs/outages/planning-and-preparedness/safety-and-preparedness/grid-reliability/electric-reliability-reports/stockton-electric-reliability-presentation-2019.pdf

IV. Protests

*****Due to the COVID-19 pandemic and the shelter at home orders, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com*****

Any party wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than August 6, 2020, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102
Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

V. Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.2., this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, August 16, 2020, which is 30 calendar days after the date of submittal.

VI. Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list R.19-09-009. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

cc: Service Lists R.19-09-009



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5882-E

Tier Designation: 2

Subject of AL: PG&E's Plans to Conduct Semi-Annual Public Safety Power Shutoffs (PSPS) Grid Resiliency Workshops in Compliance with D.20-06-017

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.20-06-017

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 8/16/20

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	Redwood Coast Energy Authority
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	Regulatory & Cogeneration Service, Inc.
Alta Power Group, LLC	Energy Management Service	SCD Energy Solutions
Anderson & Poole	Engineers and Scientists of California	
Atlas ReFuel	GenOn Energy, Inc.	SCE
BART	Goodin, MacBride, Squeri, Schlotz & Ritchie	SDG&E and SoCalGas
Barkovich & Yap, Inc.	Green Power Institute	SPURR
California Cotton Ginners & Growers Assn	Hanna & Morton	San Francisco Water Power and Sewer
California Energy Commission	ICF	Seattle City Light
California Public Utilities Commission	IGS Energy	Sempra Utilities
California State Association of Counties	International Power Technology	Southern California Edison Company
Calpine	Intestate Gas Services, Inc.	Southern California Gas Company
Cameron-Daniel, P.C.	Kelly Group	Spark Energy
Casner, Steve	Ken Bohn Consulting	Sun Light & Power
Cenergy Power	Keyes & Fox LLP	Sunshine Design
Center for Biological Diversity	Leviton Manufacturing Co., Inc.	Tecogen, Inc.
Chevron Pipeline and Power	Los Angeles County Integrated	TerraVerde Renewable Partners
City of Palo Alto	Waste Management Task Force	Tiger Natural Gas, Inc.
City of San Jose	MRW & Associates	TransCanada
Clean Power Research	Manatt Phelps Phillips	Troutman Sanders LLP
Coast Economic Consulting	Marin Energy Authority	Utility Cost Management
Commercial Energy	McKenzie & Associates	Utility Power Solutions
Crossborder Energy	Modesto Irrigation District	Water and Energy Consulting Wellhead
Crown Road Energy, LLC	NLine Energy, Inc.	Electric Company
Davis Wright Tremaine LLP	NRG Solar	Western Manufactured Housing
Day Carter Murphy	Office of Ratepayer Advocates	Communities Association (WMA)
Dept of General Services	OnGrid Solar	Yep Energy
Don Pickett & Associates, Inc.	Pacific Gas and Electric Company	
Douglass & Liddell	Peninsula Clean Energy	