

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE



August 31, 2022

**PG&E Advice Letter 6626-E and 6626-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: Information-Only Advice Letter Regarding Air Pollution Control  
Information on Tree Mortality Contracts in Compliance with  
Decision (D.) 18-12-003**

Dear Mr. Jacobson:

Advice Letter 6626-E and 6626-E-A are effective as of August 5, 2022.

Sincerely,

A handwritten signature in black ink that reads "Leuwam Tesfai".

Leuwam Tesfai  
Deputy Executive Director for Energy and Climate Policy  
Director, Energy Division

August 5, 2022

**Advice 6626-E-A**

(Pacific Gas and Electric Company U 39 E)

Public Utilities Commission of the State of California

**Subject: Supplement to Advice Letter 6626-E Information-Only Advice Letter Regarding Air Pollution Control Information on Tree Mortality Contracts in Compliance with Decision (D.) 18-12-003**

**Purpose**

Pursuant to California Public Utilities Commission (CPUC) General Order (GO) 96-B, General Rule 7.5.1, Pacific Gas and Electric Company (PG&E) submits this supplemental advice letter to supplement, in part, Advice Letter (AL) 6626-E. AL 6626-E was submitted on June 21, 2022, to provide data on the Tree Mortality (TM)<sup>1</sup> facilities' compliance with air pollution control requirements for each of PG&E's three Tree Mortality (TM) BioRAM contracts in compliance with Decision (D.) 18-12-003 (the Decision), issued on December 21, 2018.

**Background**

In Ordering Paragraph (OP) 6 of the Decision, the California Public Utilities Commission (Commission or CPUC) requires PG&E to collect air pollution control information on the TM facilities and to send an information-only advice letter to the Commission's Energy Division every six months, confirming whether the TM facilities under contract with PG&E have complied with their applicable air pollution control requirements over the previous six months, beginning six months after the date of the decision being issued. If the TM facilities do not comply with their air pollution control requirements, OP 6 requires that PG&E explain the circumstances of the non-compliance, the steps taken by the TM facility operator to rectify the non-compliance, and if the non-compliance is ongoing the expected resolution of the non-compliance. Furthermore, OP 6 of the Decision requires that each advice letter state whether any of PG&E's TM contracts are with facilities operating in federal severe or extreme nonattainment areas for particulate matter or ozone.

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<sup>1</sup> Tree Mortality contracts are those entered into pursuant to Resolutions E-4770, E-4805 and E-4977.

## **Air Pollution Control Information Reporting**

PG&E provides the following information to clarify and supplement Advice Letter 6626-E regarding each TM facilities' compliance with their applicable air pollution requirements.

### **Shasta - Sustainable Resource Management Inc**

The facility has confirmed compliance with the applicable air pollution and control requirements for the reporting period of December 1, 2021 to May 30, 2022 with the exception of the items described in the facility attestation. PG&E submits a revised attestation from Shasta – Sustainable Resource Management Inc, included as Attachment 1 to this supplemental advice letter, that explains the circumstances of the non-compliance, the steps taken by the Shasta – Sustainable Resource Management Inc to rectify the non-compliance, and the resolution of the non-compliance. Attachment 2 to this supplemental advice letter is provided to support the information described in the facility attestation. Please refer to the Deviation Reports (Form 5-L) located in Attachment 2.

### **Burney Forest Products**

The facility has confirmed compliance with the applicable air pollution and control requirements for the reporting period of November 1, 2021 to April 30, 2022 as reflected in the facility attestation provided as Attachment 3 to Advice Letter 6626-E. The facility reported no deviations or non-compliance events during this reporting period. Attachment 4 to Advice Letter 6626-E provides information to support the facility attestation and facility's compliance with its applicable air pollution requirements.

PG&E also provides the following clarification on reporting periods for the facility.

In Attachment 4 to Advice Letter 6626-E, the Title V Semi-Annual Monitoring Report identifies a reporting period of October 14, 2021 to April 13, 2022, which reflects the facility's reporting period for its submission of air pollution control data to its local air quality management district. The report describes a deviation that occurred on October 22, 2021. This deviation is not addressed in the facility attestation reflected as Attachment 3 to Advice Letter 6626-E as it occurred outside the facility's reporting period of November 1, 2021 to April 30, 2022 to PG&E. However, this deviation was omitted in the facility attestation provided in Advice Letter 6442-E filed previously on December 21, 2021. Please refer to Advice Letter 6672-E, which addresses and corrects the omission of this data from Advice Letter 6442-E.

### **Woodland Biomass**

The facility has confirmed compliance with the applicable air pollution and control requirements for the reporting period of December 1, 2021 to May 30, 2022 with the exception of the items described in the facility attestation. PG&E submits a revised attestation from Woodland Biomass, included as Attachment 3 to this supplemental





# 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 (U 39 E)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Stuart Rubio

Phone #: (415) 973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: SHR8@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) #: 6626-E-A

Tier Designation: info-only

Subject of AL: Supplement to Advice Letter 6626-E Information-Only Advice Letter Regarding Air Pollution Control Information on Tree Mortality Contracts in Compliance with Decision (D.) 18-12-003

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.18-12-003

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: N/A

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: 8/5/22

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 proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss in AL if more space is needed.

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

California Public Utilities Commission  
Energy Division Tariff Unit Email:  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson  
Title: Director, Regulatory Relations  
Utility/Entity Name: Pacific Gas and Electric Company  
  
Telephone (xxx) xxx-xxxx: (415)973-2093  
Facsimile (xxx) xxx-xxxx:  
Email: PGETariffs@pge.com

Contact Name:  
Title:  
Utility/Entity Name:  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

CPUC  
Energy Division Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

Clear Form

**PACIFIC GAS AND ELECTRIC COMPANY**

**ATTACHMENT 1**

**Shasta – Sustainable Resource Management Inc**

**Air Quality Attestation (revised)**



Shasta-Sustainable Resource Management, Inc.  
20811 Industry Rd.  
Anderson, CA 96007  
(530) 339-7600

## APPENDIX C AIR QUALITY ATTESTATION

[VIA ELECTRONIC SUBMISSION]

*Original June 14, 2022*

*Revised July 25, 2022*

**PG&E**

*Attn: Energy Contract Management and Settlements*

*77 Beale Street, Mail Code N12E*

*San Francisco, CA 94105, 94105-1702*

Subject: Bioenergy Renewable Auction Mechanism Power Purchase Agreement (“BioRAM PPA”) by and between PG&E (“Buyer”) and *Shasta - Sustainable Resource Management Inc, a Delaware corporation* (“Seller”) – Seller’s Air Quality Attestation

Dear Sir or Madam:

Pursuant to Section 3.11 of the BioRAM PPA, Seller attests that the Project *was not* in compliance with all applicable air pollution and control requirements for the period beginning *December 1, 2021* and ending *May 30, 2022*. Seller hereby represents and warrants that:

1. This Air Quality Attestation *is* submitted on or prior to the semiannual air quality attestation due date as specified in Section 3.11.
2. Seller *was not* in compliance with all applicable air pollution and control requirements for the period.
3. List of non-compliance:  
*Deviations to Title V permit conditions occurred during the reporting period as detailed in the attached Deviation Report Forms.*  
*Condition 47 of the permit requires that the ESP power be continuously monitored and that the hourly values be recorded in a log. The computer failed to save the ESP hourly power averages records for these times:*
  - *1/23/22 – missing hours 1800 and 1900*
  - *1/27/22 - missing hours 0000 through 0600 and 0800*
  - *2/4/22 – missing hours 1500 through 1700*
  - *3/27/22 – missing hours 0100 through 0500**There were no malfunctions of the particulate emission control equipment itself and this did not result in an increase in emissions from the facility.*

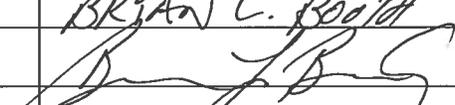


Shasta-Sustainable Resource Management, Inc.  
20811 Industry Rd.  
Anderson, CA 96007  
(530) 339-7600

*On April 16 2022, the facility connected up new equipment and software to provide a continuous record of the ESP power to resolve this issue.  
Condition 56 of the permit requires compliance with all conditions of the permit. This condition was resolved when the new equipment for recording hourly ESP averages was connected on April 16, 2022.*

Compliance with the Project's applicable air quality and control requirements is documented in the attached Air Pollution Report. Buyer may request additional information to accommodate reporting and demonstrate Seller's compliance with air pollution and control requirements.

Capitalized terms used but not otherwise defined in this letter have the meanings set forth in the BioRAM PPA. The authorized signature from the Seller certifies that Seller has the knowledge and authority to attest that the information on this form is true and correct.

Seller	SHASTA SUSTAINABLE RESOURCE MANAGEMENT
Print Name	BRYAN L. BOOTH
Signature	
Title	PLANT MANAGER
Date	7/26/22

Attachment:

- Certification Report for the period beginning December 1, 2021 and ending May 30, 2022

**PACIFIC GAS AND ELECTRIC COMPANY**

**ATTACHMENT 2**

**Shasta – Sustainable Resource Management Inc**

**Certification Report**

Facility Name: Shasta – Sustainable Resource Management  
Reporting Period: December 1, 2021 to May 30, 2022  
Facility Permit Number: 86-TV-08j

Report Due Date: June, 2022  
Submittal:  Monitoring Report (District Rule 5.VI.B.7)  
 Compliance Schedule Progress Report  
 Compliance Certification (District Rule 5.VI.B.14)

1. Facility Information

Company Name: Shasta – Sustainable Resource Management  
Facility Name: Shasta – Sustainable Resource Management  
Nature of Business: Power Generation

Mailing Address: 20811 Industry Road  
Anderson, CA 96007  
Street Address: Same as Mailing Address

2. See attached Applicable Requirements Tables, and associated attachments for required reporting information. Terms used in the table are defined below.

An **excursion** is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

An **exceedance** is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

3. CERTIFICATION

Statement of Certification:

I certify based on information and belief formed after reasonable inquiry, the statement and information in this document and attachments are true, accurate, and complete.

BRYAN L. BOOTH  
Name of Responsible Official Certifying Compliance

PLANT MANAGER  
Title of Responsible Official and Company Name

  
Signature of Responsible Official

7/26/22  
Date

Annual Compliance Certifications (District Rule 5.VI.B.14) must also be submitted to:

U.S. EPA Region IX  
Air Division (AIR-3)  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Facility Name: Shasta – Sustainable Resource Management  
 Reporting Period: December 1, 2021 to May 30, 2022  
 Facility Permit: 86-TV-08j

Report Due Date:  
 Submittal Type:

June 2022

<input type="checkbox"/>	Monitoring Report (District Rule 5.VI.B.7)
<input type="checkbox"/>	Compliance Schedule Progress Report
<input checked="" type="checkbox"/>	Compliance Certification (District Rule 5.VI.B.14)

Applicable Requirements Table														
Permit(s) & Conditions(s)	Compliance Determination Method (frequency, test method, etc....)	Currently in Compliance?	Compliance Determination Method		During the Reporting Period (If yes to any question, attach Form 5-L)						Source Testing Required by Permit? (If yes, attach Form 5-K2 or summary)			
					Any Excursions?		Any Exceedances?		Other Information Indicating Non-Compliance?					
86-VP-08h and 86-TV-08i Condition 1	<b>Standard Emission Limits</b> - Compliance with other permit terms, along with equipment design, assures compliance with these general limits.	X Yes No	X	X	Continuous	Intermittent	Yes	X No	Yes	X No	Yes	X No	Yes	X No
86-VP-08h and 86-TV-08i Condition 2	<b>Photochemically Reactive Solvents</b> - Use low VOC solvent in the plant's parts washer.	X Yes No		X	Continuous	Intermittent	Yes	X No	Yes	X No	Yes	X No	Yes	X No
86-VP-08h and 86-TV-08i Condition 3	<b>Stack Opacity Limits</b> – Maintain Continuous Opacity Monitors (COMS) and computer to calculate 6-minute block averages. Maintain at least one Visible Emissions Evaluator at the site and perform daily stack readings using Method 9.	X Yes No	X		Continuous	Intermittent	Yes	X No	Yes	X No	Yes	X No	Yes	X No
86-VP-08h and 86-TV-08i Condition 4	<b>BACT</b> - Maintain BACT at the facility, review excess emissions to verify that BACT systems were operating.	X Yes No		X	Continuous	Intermittent	Yes	X No	Yes	X No	Yes	X No	Yes	X No
86-VP-08h and 86-TV-08i Condition 5a (District-only requirement)	<b>Particulate Limits</b> - Conduct Annual Stack Testing for Particulate using EPA Method 5 and ARB Method 5	X Yes No		X	Continuous	Intermittent	Yes	X No	Yes	X No	Yes	X No	X	Yes No
86-VP-08h and 86-TV-08i Condition 5b (District-only requirement)	<b>NMHC Limits</b> - Conduct VOC testing according to EPA Method 18/25A at the frequency specified in Condition 28.	X Yes No		X	Continuous	Intermittent	Yes	X No	Yes	X No	Yes	X No	X	Yes No
86-VP-08h and 86-TV-08i Condition 5c (District-only requirement)	<b>SOx Limits</b> - Note - RR Ties are no longer permitted under Boiler MACT.	X Yes No		X	Continuous	Intermittent	Yes	X No	Yes	X No	Yes	X No	X	Yes No
86-VP-08h and 86-TV-08i Condition 5d (District-only requirement)	<b>NOx and Ammonia Limits</b> - Maintain Continuous Emissions Monitoring System (CEMS) for NOx. Conduct Annual Stack Test for Ammonia.	X Yes No	X	X	Continuous	Intermittent	Yes	X No	Yes	X No	Yes	X No	X	Yes No
86-VP-08h and 86-TV-08i Condition 5e (District-only requirement)	<b>CO Limits</b> - Conduct Annual Compliance Testing using ARB Method 100 and maintain Continuous Emission Monitoring System for CO.	X Yes No	X	X	Continuous	Intermittent	Yes	X No	Yes	X No	Yes	X No	X	Yes No

Facility Name: Shasta – Sustainable Resource Management  
 Reporting Period: December 1, 2021 to May 30, 2022  
 Facility Permit: 86-TV-08j

Report Due Date:  
 Submittal Type:

June 2022

<input type="checkbox"/>	Monitoring Report (District Rule 5.VI.B.7)
<input type="checkbox"/>	Compliance Schedule Progress Report
<input checked="" type="checkbox"/>	Compliance Certification (District Rule 5.VI.B.14)

Applicable Requirements Table																
Permit(s) & Conditions(s)	Compliance Determination Method (frequency, test method, etc....)	Currently in Compliance?	Compliance Determination Method		During the Reporting Period (If yes to any question, attach Form 5-L)									Source Testing Required by Permit? (If yes, attach Form 5-K2 or summary)		
					Any Excursions?			Any Exceedances?			Other Information Indicating Non-Compliance?					
86-VP-08h and 86-TV-08i Condition 6 (District-only requirement)	<b>Fugitive Emissions Control</b> - Maintain dust control systems, high wind speed actions, ash handling, housekeeping and work practices.	X Yes No	Continuous	X Intermittent	Yes	X	No	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 7	<b>Emission Offsets</b> - Maintain a database of fuel purchased for the facility, tracking fuel purchases from within the Sacramento River Air Basin of fuel that would otherwise have been open burned. Calculate offsets on an annual basis using ARB Manual of Procedures (MOP).	X Yes No	Continuous	X Intermittent	Yes	X	No	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 8	<b>Emission Offsets</b> – Obtain appropriate offsets that meet requirements and submit report to AQMD.	X Yes No	Continuous	X Intermittent	Yes	X	No	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 9	<b>Excess Emissions</b> – Take immediate action on excess emissions. Conduct Annual Stack Testing and maintain Continuous Emissions Monitoring System.	X Yes No	Continuous	X Intermittent	Yes	X	No	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 10	<b>Halogenated Solvent Degreaser</b> - Obtain AQMD approval prior to using halogenated solvent in the cold cleaning solvent degreaser.	X Yes No	Continuous	X Intermittent	Yes	X	No	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 11	<b>Fuel Sources</b> - Maintain fuel database, track fuel sources for the facility and implement fuel quality control procedures. Prior to using fuels listed in Condition 11.h, fuel must be determined to qualify as a non-hazardous secondary material.	X Yes No	Continuous	X Intermittent	Yes	X	No	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 12	<b>Fuel Process Rates</b> - Maintain fuel database tracking fuel sources for the facility. Maintain facility capacity factor and submit to the District in the monthly report.	X Yes No	Continuous	X Intermittent	Yes	X	No	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 13 (District-only requirement)	<b>Fuel Supplier Agreements</b> – Include stipulation that fuel suppliers obtain and maintain required licenses, permits and other governmental approvals. Maintain records of fuel supplier fuel agreements.	X Yes No	Continuous	X Intermittent	Yes	X	No	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 14	<b>Standards for Performance for CISWI, If Applicable</b> – Maintain fuel database tracking fuel sources for the facility, demonstrating that solid waste, as determined in 40 CFR 241, are not used as fuel.	X Yes No	Continuous	X Intermittent	Yes	X	No	Yes	X	No	Yes	X	No	Yes	X	No

Facility Name: Shasta – Sustainable Resource Management  
 Reporting Period: December 1, 2021 to May 30, 2022  
 Facility Permit: 86-TV-08j

Report Due Date:  
 Submittal Type:

June 2022

<input type="checkbox"/>	Monitoring Report (District Rule 5.VI.B.7)
<input type="checkbox"/>	Compliance Schedule Progress Report
<input checked="" type="checkbox"/>	Compliance Certification (District Rule 5.VI.B.14)

Applicable Requirements Table											
Permit(s) & Conditions(s)	Compliance Determination Method (frequency, test method, etc....)	Currently in Compliance?	Compliance Determination Method		During the Reporting Period (If yes to any question, attach Form 5-L)						Source Testing Required by Permit? (If yes, attach Form 5-K2 or summary)
					Any Excursions?		Any Exceedances?		Other Information Indicating Non-Compliance?		
86-VP-08h and 86-TV-08i Condition 15	<b>Air Pollution Control Equipment</b> - Maintain facility such that the Air Pollution Control equipment is in service while combustion process is occurring.	X Yes No	X Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 16	<b>CEMS</b> - Maintain the Continuous Emissions Monitoring System (CEMS) and Data Acquisition System (DAS). Review emissions data monthly and summarize monitor downtime in the monthly report.	X Yes No	X Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 17	<b>Fuel Turnover</b> – Maintain fuel turnover to less than 180 days. Compliance is demonstrated by following the Fuel Management Plan (Condition 54).	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 19	<b>Steam Limits</b> - Maintain the DAS and fuel use database.	X Yes No	X Continuous	Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 20	<b>Water Treatment Chemicals</b> – Ensure no chrome-based water treatment chemicals are used.	X Yes No	X Continuous	Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 21a - 21f	<b>Combustion and Control Parameters</b> - Maintain the Bailey/NT Boiler Control system for conditions 21b through 21f. Maintain DAS and fuel use database for Condition 21a.	X Yes No	X Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 21g	<b>Sulfur in Fuels</b> - monitor if use new fuels	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 22	<b>Emission Reports</b> - Submit a monthly report containing the required information to the District by the first day of the following month.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 23 (District-only requirement)	<b>Deodorizer Use Records</b> – Maintain monthly deodorizer use records along with calendar year totals.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	

Facility Name: Shasta – Sustainable Resource Management  
 Reporting Period: December 1, 2021 to May 30, 2022  
 Facility Permit: 86-TV-08j

Report Due Date:  
 Submittal Type:

June 2022

<input type="checkbox"/>	Monitoring Report (District Rule 5.VI.B.7)
<input type="checkbox"/>	Compliance Schedule Progress Report
<input checked="" type="checkbox"/>	Compliance Certification (District Rule 5.VI.B.14)

Applicable Requirements Table													
Permit(s) & Conditions(s)	Compliance Determination Method (frequency, test method, etc....)	Currently in Compliance?		Compliance Determination Method		During the Reporting Period (If yes to any question, attach Form 5-L)						Source Testing Required by Permit? (If yes, attach Form 5-K2 or summary)	
						Any Excursions?		Any Exceedances?		Other Information Indicating Non-Compliance?			
86-VP-08h and 86-TV-08i Condition 24	<b>Emission Test Methods</b> – Use only stipulated test methods unless approved in advance.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Continuous	<input checked="" type="checkbox"/> Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 25	<b>Annual Source Test</b> – Conduct annual source test for PM and ammonia. Annually test for SOx feeding creosote-treated wood at rates as indicated.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Continuous	<input checked="" type="checkbox"/> Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 26	<b>Annual Source Test Process Rate</b> – Conduct annual source test within 90% of full operation in accordance with District Rule 3:26.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Continuous	<input checked="" type="checkbox"/> Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 27	<b>Source Test</b> – Use independent vendor; Comply with approved test method procedures.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Continuous	<input checked="" type="checkbox"/> Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 28	<b>Source Tests</b> - Perform source tests at the required frequency. Submit test reports to AQMD as required.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Continuous	<input checked="" type="checkbox"/> Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 29	<b>Excess Emissions</b> - Maintain a log of APCO notifications, Report within 4 hours	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Continuous	<input checked="" type="checkbox"/> Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 30	<b>Permit Deviations</b> - Maintain a log of APCO notifications.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Continuous	<input checked="" type="checkbox"/> Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 31	<b>Semi-Annual Compliance Reports</b> - Submit the semi-annual compliance certification to the District by the required date.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Continuous	<input checked="" type="checkbox"/> Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 32	<b>Annual Compliance Reports</b> - Submit annual certification to the District and U.S. EPA.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Continuous	<input checked="" type="checkbox"/> Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No

Facility Name: Shasta – Sustainable Resource Management  
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 Facility Permit: 86-TV-08j

Report Due Date:  
 Submittal Type:

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<input type="checkbox"/>	Monitoring Report (District Rule 5.VI.B.7)
<input type="checkbox"/>	Compliance Schedule Progress Report
<input checked="" type="checkbox"/>	Compliance Certification (District Rule 5.VI.B.14)

Applicable Requirements Table																
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						Any Excursions?		Any Exceedances?		Other Information Indicating Non-Compliance?						
86-VP-08h and 86-TV-08i Condition 33	<b>Emission Limit Demonstration</b> – Verify compliance with standard limits upon request. No request was made.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 34	<b>Visible Emission Observations</b> - Use opacity monitor for compliance with visible emissions limits.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 35	<b>Monitoring and Support Records</b> - Maintain records of maintenance and operation. Maintain CEMS data records.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 36	<b>Emission Increases</b> – Notify AQMD of changes that increase emissions.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 37	<b>File of all Measurements &amp; Other Information Required in 40 CFR 60</b> - Maintain file of all measurements and other information required in 40 CFR 60 including CEMS, performance testing, etc.....	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 38	<b>Compliance Test Notification &amp; Report Submittals</b> - Maintain all APCO correspondence pertaining to notification of emission testing and testing results.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 39	<b>Testing Facilities</b> - Maintain a safe stack sampling location.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 40 (District-only requirement)	<b>Wind Speed and Direction</b> - Maintain a wind speed/direction monitor at the site. Data is recorded on electronic media.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 41	<b>Good Operating Practices</b> – Operate and maintain equipment to minimize emissions.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No

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<input type="checkbox"/>	Compliance Schedule Progress Report
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					Any Excursions?		Any Exceedances?		Other Information Indicating Non-Compliance?				
86-VP-08h and 86-TV-08i Condition 42	<b>Opacity Monitors Span &amp; Data Acquisition</b> – Maintain properly designed and installed opacity monitors. Maintain COMS data records.	X Yes No	X	Continuous	Intermittent	Yes	X No	Yes	X No	Yes	X No	Yes	X No
86-VP-08h and 86-TV-08i Condition 43	<b>CEMs Data</b> – Maintain CEMs operational and log of AQMD notifications.	X Yes No	X	Continuous	Intermittent	Yes	X No	Yes	X No	Yes	X No	Yes	X No
86-VP-08h and 86-TV-08i Condition 44	<b>Fuels &amp; Capacity Factor</b> – Maintain records of amounts of each fuel used. Maintain a record of monthly rolling annual capacity factor for each boiler.	X Yes No		Continuous	X Intermittent	Yes	X No	Yes	X No	Yes	X No	Yes	X No
86-VP-08h and 86-TV-08i Condition 45	<b>Risk Management Plan</b> - Maintain Risk Management Plan.	X Yes No		Continuous	X Intermittent	Yes	X No	Yes	X No	Yes	X No	Yes	X No
86-VP-08h and 86-TV-08i Condition 46	<b>CAM Plan</b> - Maintain ESP monitoring computer and records required by the Compliance Assured Monitoring (CAM) Plan.	X Yes No	X	Continuous	Intermittent	Yes	X No	Yes	X No	Yes	X No	Yes	X No
86-VP-08h and 86-TV-08i Condition 47	<b>ESP Power</b> - Maintain ESP power monitoring system.	X Yes No	X	Continuous	Intermittent	X	Yes X No	Yes	X No	Yes	X No	Yes	X No
86-VP-08h and 86-TV-08i Condition 48	<b>ESP Power Excursions</b> - Respond to and report as excursions all periods where the power requirement is not met. Maintain power input greater than 22 kw.	X Yes No		Continuous	X Intermittent	Yes	X No	Yes	X No	Yes	X No	Yes	X No
86-VP-08h and 86-TV-08i Condition 49	<b>Semi-Annual NSPS Excess Emission Report</b> - Submit semi-annual excess emission report to USEPA Region IX.	X Yes No		Continuous	X Intermittent	Yes	X No	Yes	X No	Yes	X No	Yes	X No
86-VP-08h and 86-TV-08i Condition 50	<b>Semi-Annual NSPS Summary Report</b> - Submit semi-annual summary report.	X Yes No		Continuous	X Intermittent	Yes	X No	Yes	X No	Yes	X No	Yes	X No

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						Any Excursions?		Any Exceedances?		Other Information Indicating Non-Compliance?						
86-VP-08h and 86-TV-08i Condition 51 (District-only requirement)	<b>Fuel Pile Camera &amp; Observations</b> - Use camera to observe fuel piles. Report outages longer than 6 hours.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 52 (District-only requirement)	<b>Fuel Pile Dimensions</b> – Conduct quarterly fuel pile surveys.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 53 (District-only requirement)	<b>Off-Site Fuel Storage</b> - Report off-site fuel storage to the District in the monthly report.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 54 (District-only requirement)	<b>Fuel Management Plan</b> - Implement the Fuel Management Plan approved by the District. Train operating staff on the plan and keep records.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 56	<b>Title V Conditions</b> – Comply with all conditions of the permit	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 62	<b>Information Requests</b> – Supply information to AQMD upon request.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 63	<b>Construction</b> – Obtain authorization as needed for new equipment or changes to emissions sources.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 64	<b>Operating Permit</b> – Obtain permits as needed for new equipment or changes to emissions sources.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 66	<b>Permit</b> – Maintain permits in good condition.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No

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						Any Excursions?		Any Exceedances?		Other Information Indicating Non-Compliance?			
86-VP-08h and 86-TV-08i Condition 67	<b>Permit Posting</b> – Maintain posted permits in good condition.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Continuous	<input checked="" type="checkbox"/> Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 73	<b>Inspections</b> – Permit entry of authorized agency personnel.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Continuous	<input checked="" type="checkbox"/> Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 75	<b>Permit Renewal</b> – Submit administratively complete permit renewal application within required timeframe.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Continuous	<input checked="" type="checkbox"/> Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 76	<b>Fees</b> – Submit annual fees	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Continuous	<input checked="" type="checkbox"/> Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 77	<b>Ozone Depleting Substances</b> – Hire only certified technicians for ODS work.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Continuous	<input checked="" type="checkbox"/> Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 78	<b>Ozone Depleting Substances</b> – Hire only certified technicians for ODS work.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Continuous	<input checked="" type="checkbox"/> Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 79	<b>Ozone Depleting Substances</b> – Hire only certified technicians for ODS work.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Continuous	<input checked="" type="checkbox"/> Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 80	<b>Circumvention</b> – Maintain operations so as to not circumvent emission limits.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous	Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 82	<b>Maintenance</b> – Maintain equipment in original operating condition.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous	Intermittent	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No	Yes	<input checked="" type="checkbox"/> No

Facility Name: Shasta – Sustainable Resource Management  
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86-VP-08h and 86-TV-08i Condition 84	<b>Equipment Design</b> – Design all equipment to minimize emissions and maintain compliance.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 86	<b>Training</b> – Provide training for operating staff.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 87	<b>New Source Performance Standards</b> – Comply with NSPS standards.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 89	<b>Subpart ZZZZ Diesel Engine Requirements</b> – Track hours of operation. Ensure maintenance is performed and records are kept as required.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 90	<b>Subpart ZZZZ Diesel Engine Records</b> – Maintain maintenance records and records of hours of operation.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 92	<b>Boiler Tune-Ups</b> – Tune each boiler at the required frequency. Tune-ups are annual unless a continuous oxygen trim system is used.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 93	<b>Energy Assessment</b> – Perform the Energy Assessment. Submit upon request.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 94	<b>Initial Notification of Compliance Status</b> – Submit the initial Compliance Status Report within 60 days of completion of all initial performance tests and other initial compliance demonstrations.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 95	<b>Subpart DDDDD 30-Day Rolling CO Limit</b> - Maintain Continuous Emissions Monitoring System (CEMS) for CO to calculate 30-day rolling averages.	X Yes No	X Continuous	Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	

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					Any Excursions?		Any Exceedances?		Other Information Indicating Non-Compliance?				
86-VP-08h and 86-TV-08i Condition 96	<b>Subpart DDDDD Mercury Limit</b> - Conduct performance testing according to Table 5 in 40 CFR Part 63, Subpart DDDDD at the frequency specified in Condition 108 and 112.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	X Yes No				
86-VP-08h and 86-TV-08i Condition 97	<b>Subpart DDDDD Hydrochloric Acid Limit</b> - Conduct performance testing according to Table 5 in 40 CFR Part 63, Subpart DDDDD at the frequency specified in Condition 108 and 112.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	X Yes No				
86-VP-08h and 86-TV-08i Condition 98	<b>Subpart DDDDD Particulate Limit</b> - Conduct performance testing according to Table 5 in 40 CFR Part 63, Subpart DDDDD at the frequency specified in Condition 108 and 112.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	X Yes No				
86-VP-08h and 86-TV-08i Condition 99	<b>Subpart DDDDD Opacity Limit</b> – Maintain Continuous Opacity Monitors (COMS) and computer to calculate daily block averages.	X Yes No	X Continuous	Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No				
86-VP-08h and 86-TV-08i Condition 100	<b>Subpart DDDDD Operating Load Limit</b> – Maintain Continuous Monitoring System for steam production and a computer to calculate 30-day rolling averages.	X Yes No	X Continuous	Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	X Yes No				
86-VP-08h and 86-TV-08i Condition 101	<b>Subpart DDDDD Boiler Emission Averaging</b> – Emission averaging is not done. No plan needed, not using emissions averaging.	X Yes No	X Continuous	Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No				
86-VP-08h and 86-TV-08i Condition 102	<b>Subpart DDDDD Good Operating Practices</b> – Operate and maintain equipment to minimize emissions.	X Yes No	X Continuous	Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No				
86-VP-08h and 86-TV-08i Condition 103	<b>Subpart DDDDD Startup &amp; Shutdown Exemptions</b> – For all startup and shutdown events that are exempted from emission limits in Conditions 95-101. Follow the listed practices.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No				
86-VP-08h and 86-TV-08i Condition 104	<b>Subpart DDDDD Affirmative Defense</b> – May be made for malfunctions as per requirements	X Yes No	X Continuous	Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No				

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86-VP-08h and 86-TV-08i Condition 105	<b>Subpart DDDDD Data Collection</b> – Collect data in accordance with Table 8 of Subpart DDDDD.	X Yes No	X	Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 106	<b>Subpart DDDDD Site Specific Monitoring Plan</b> – Develop and maintain a Site Specific Monitoring Plan. Submit upon request.	X Yes No	X	Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 107	<b>Subpart DDDDD Monitoring Systems Operation</b> – Operate the monitoring system as required, maintain records of system operations including results of performance audits, out of control periods, etc.... and submit upon request. Include all data, unless otherwise excepted, in assessing compliance.	X Yes No	X	Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 108	<b>Subpart DDDDD Initial Performance Test</b> – Perform the initial testing.	X Yes No		Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 109	<b>Initial Performance Testing Alternative: Fuel Sampling &amp; Analysis</b> – This option was not used.	X Yes No		Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 110	<b>Initial &amp; Annual Performance Evaluations of CO CEMS &amp; COMS</b> – Notify the District of evaluations, perform evaluations initially and annually, and submit the evaluation reports, as required in the permit.	X Yes No		Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 111	<b>Site Specific Fuel Monitoring Plan, If Required</b> - A fuel monitoring plan is not required at this time, as the plant uses a single fuel (biomass) along with natural gas as supplemental fuel for startup, shutdown, and flame stabilization purposes.	X Yes No		Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 112	<b>Periodic Performance Testing</b> – Perform testing annually (at least every 12 months), or every 3 <sup>rd</sup> year (at least every 37 months), if pollutants are less than 75% of the applicable limit for at least two years and there are no changes that could increase emissions.	X Yes No		Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	X Yes No		
86-VP-08h and 86-TV-08i Condition 113	<b>Periodic Performance Testing Alternative: Fuel Sampling &amp; Analysis</b> – This option is not used.	X Yes No		Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	

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86-VP-08h and 86-TV-08i Condition 114	<b>Performance Testing Methods, Notifications, &amp; Submittal of Test Plans</b> – Use the specified methods and submit notifications and test plans as required in the permit.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 115	<b>Performance Test Reports</b> – Submit performance test reports as required in the permit.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 116	<b>New Fuel Requirements</b> –No new fuels used during the reporting period.	X Yes No	X Continuous	Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 117	<b>Applicability of New 40 CFR 63 Subpart DDDDD Subcategory Due to Fuel Switch / Physical Boiler Change</b> – Submit required notification if applicability changes. No such change this reporting period.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 118	<b>Non-Hazardous Secondary Materials, Not Solid Waste</b> – If NHSM have been determined not to be solid waste per 40 CFR 241, keep records of the determination as required in the permit.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 119	<b>40 CFR 63 Subpart DDDDD Semi-Annual Compliance Reports</b> – Submit semi-annual reports.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 120	<b>Maintain 40 CFR 63 Subpart DDDDD Records</b> – Subpart DDDDD records are maintained as required.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 121	<b>Alternative Output Based Limits &amp; Credit for Energy Conservation Measures</b> – These options are not used.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	

<b>List of Conditions Not Requiring Certification (Informational Only)</b>	
Title V Condition No.	January 1, 2020 to December 31, 2020
18	Combustion of wet fuel only considered an upset/malfunction condition when slug feeding of fuel wetted by an unusual storm occurrence causes the emission excursions.
55	References to rules, regulations, etc.. in the permit refer to those in place at the time of permit issuance.
57	Title V Permit does not convey property rights.
58	Non-compliance with Title V Permit is grounds for termination, revocation, modification, enforcement, or denial of permit renewal for both the Title V Permit and the Permit to Operate.
59	Permit can be modified, revoked, reopened and reissued, or terminated for cause.
60	Not a defense that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
61	Pending permit action or notification of anticipated non-compliance does not stay any permit condition.
65	Where an application for or issuance of a permit is pending or in the event of an emergency occurring as a result of an excusable malfunction of a device under permit, AQMD may authorize the operation of the article, machine, equipment, etc... for which a permit is sought for periods of time not to exceed 60 days each for the purpose of testing, experimentation, or obtaining necessary data for a permit or correcting a malfunction.
68	Information that AQMD requires prior to building, erecting, altering, etc... an air emissions source is public record.
69	Air and other pollution monitoring data, including data compiled from facilities are public records.
70	Except as otherwise provided, trade secrets (as described) are not public records.
71	Emission data are public records. Data used to calculate emissions that constitute trade secrets are not public records.
72	Each and every provision of federal or state law or applicable Air Basin Plan now or hereinafter enacted or as amended that regulates the discharge of any air contaminants is incorporated here by reference. Where such provision conflict with local rules and regulations, the more restrictive provision shall apply.
74	Provisions of the Title V Permit are severable.
81	The Title V Permit is not transferable.
83	If any provision of this permit is found invalid, such finding shall not affect the remaining provisions.
85	The right of entry described in California Health and Safety Code Section 41510, Division 26, shall apply at all times.
88	Regarding emissions trading, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in the permit.
104	Information on affirmative defense provisions of 40 CFR Part 63, Subpart DDDDD.
122	Permit Shield

## 2022 Title V Certification – Deviations and Test Data

### DEVIATION REPORT (FORM 5-L)

#### SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT

#### DEVIATION INFORMATION

- 1. Permit numbers(s) and condition(s) of emission unit or control unit affected:**  
86-TV-08j –Condition 47
  
- 1. Description of deviation and methods used to determine compliance status:**  
As previously reported, the hourly ESP data was not being continuously monitored and recorded on a log at all times. There were four days when there were gaps in the continuous records. It should be noted that there were no malfunctions of the particulate control equipment itself and this did not result in an increase in emissions from the facility.
  
- 2. Description and identification of permit condition(s) deviated:**  
Condition 47 requires that the ESP power be continuously monitored and that the hourly values be recorded in a log. The computer that logs the data did not record the ESP power values for the periods listed below.
  
- 3. Associated equipment and equipment operation (if any):**  
ESP and computer to log the ESP power data.
  
- 4. Date and time when deviation was discovered:**  
The data gaps were discovered when the report was generated
  
- 5. Date, time and duration of deviation:**  
The gaps of data are listed below:
  - 1/23/22 – missing hours 1800 and 1900
  - 1/27/22 - missing hours 0000 through 0600 and 0800
  - 2/4/22 – missing hours 1500 through 1700
  - 3/27/22 – missing hours 0100 through 0500
  
- 6. Probable cause of deviation:**  
The software program to record the data did not record the data.
  
- 7. Preventative or corrective action taken:**  
An investigation of alternate methods to back up or record data was made for the control room computer. As of 4/16/22 the ESP power data is also being saved to the plant control computer and the emission monitoring system.

## 2022 Title V Certification – Deviations and Test Data

### DEVIATION REPORT (FORM 5-L)

#### SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT

#### DEVIATION INFORMATION

- 1. Permit numbers(s) and condition(s) of emission unit or control unit affected:**  
86-TV-08j – Condition 56
- 2. Description of deviation and methods used to determine compliance status:**  
As noted elsewhere in the report there were deviations to compliance with some permit conditions.
- 3. Description and identification of permit condition(s) deviated:**  
Condition 56 requires compliance with all conditions in the permit.
- 4. Associated equipment and equipment operation (if any):**  
See the other Form 5-Ls included in this report.
- 5. Date and time when deviation was discovered:**  
See the other Form 5-Ls included in this report.
- 6. Date, time and duration of deviation:**  
See the other Form 5-Ls included in this report
- 7. Probable cause of deviation:**  
See the other Form 5-Ls included in this report.
- 8. Preventative or corrective action taken:**  
See the other Form 5-Ls included in this report.

## 2022 Title V Certification – Deviations and Test Data

### QUANTIFIABLE APPLICABLE REQUIREMENT REPORT (FORM 5-K2)

#### SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT

##### Emission Unit Description: Boiler 1

Pollutant	Unit of Measure	Measured Emission Rate	Emission Rate Limit	Specific Source Test or Monitoring Record Citation	Date of Test
Carbon Monoxide - CO	ppm @ 3% O <sub>2</sub>	393	1696 Three boiler average	EPA Method 10	6/21/21 and 6/22/21
Carbon Monoxide - CO	lbs/hr	94	793 Total all three boilers	EPA Method 10	6/21/21 and 6/22/21
Ammonia - NH <sub>3</sub>	ppm @ 3% O <sub>2</sub>	14.8	28	SCAQMD 207.1 Modified	6/21/21 and 6/22/21
Oxides of Sulfur - SO <sub>2</sub>	ppm @ 3% O <sub>2</sub>	0.3	24	EPA Method 6C	6/21/21 and 6/22/21
Oxides of Sulfur - SO <sub>2</sub>	lbs/hr	0.2	45 Total all three boilers	EPA Method 6C	6/21/21 and 6/22/21
Filterable Particulate	gr/dscf @ 3% O <sub>2</sub>	0.00065	0.014	CARB Method 5	6/21/21 and 6/22/21
Total Particulate	lbs/hr	1.3	20	CARB Method 5	6/21/21 and 6/22/21
Nonmethane Hydrocarbons	ppm @ 3% O <sub>2</sub>	10.2	191	EPA Method 25A & EPA Method 18	6/21/21 and 6/22/21
Nonmethane Hydrocarbons	lbs/hr	1.0	89 Total all three boilers	EPA Method 25A & EPA Method 18	6/21/21 and 6/22/21
Mercury – Hg*	lbs/MMBtu	<1.21 E-6	5.76 E-6	EPA Method 29	6/21/21 and 6/22/21
Hydrochloric Acid – HCl*	lbs/MMBtu	0.00017	0.022	EPA Method 26A	6/21/21 and 6/22/21
Filterable Particulate*	lbs/MMBtu	0.0015	0.037	CARB Method 5	6/21/21 and 6/22/21

\*As per Condition 112 of the permit, testing results are less than 75% of the limit

## 2022 Title V Certification – Deviations and Test Data

### QUANTIFIABLE APPLICABLE REQUIREMENT REPORT (FORM 5-K2)

**Emission Unit Description: Boiler 2**

Pollutant	Unit of Measure	Measured Emission Rate	Emission Rate Limit	Specific Source Test or Monitoring Record Citation	Date of Test
Carbon Monoxide - CO	ppm @ 3% O <sub>2</sub>	671	1696 Three boiler average	EPA Method 10	6/23/21
Carbon Monoxide - CO	lbs/hr	165	793 Total all three boilers	EPA Method 10	6/23/21
Ammonia - NH <sub>3</sub>	ppm @ 3% O <sub>2</sub>	10.1	28	SCAQMD 207.1 Modified	6/23/21
Oxides of Sulfur - SO <sub>2</sub>	ppm @ 3% O <sub>2</sub>	0.8	24	EPA Method 6C	6/23/21
Oxides of Sulfur - SO <sub>2</sub>	lbs/hr	0.5	45 Total all three boilers	EPA Method 6C	6/23/21
Filterable Particulate	gr/dscf @ 3% O <sub>2</sub>	0.0018	0.014	CARB Method 5	6/23/21
Total Particulate	lbs/hr	1.4	20	CARB Method 5	6/23/21
Nonmethane Hydrocarbons	ppm @ 3% O <sub>2</sub>	13.1	191	EPA Method 25A & EPA Method 18	6/23/21
Nonmethane Hydrocarbons	lbs/hr	1.4	89 Total all three boilers	EPA Method 25A & EPA Method 18	6/23/21
Mercury – Hg*	lbs/MMBtu	<1.30 E-6	5.76 E-6	EPA Method 29	6/23/21
Hydrochloric Acid – HCl*	lbs/MMBtu	0.00019	0.022	EPA Method 26A	6/23/21
Filterable Particulate*	lbs/MMBtu	0.0023	0.037	CARB Method 5	6/23/21 and 6/24/21

\*As per Condition 112 of the permit, testing results are less than 75% of the limit

## 2022 Title V Certification – Deviations and Test Data

<b>QUANTIFIABLE APPLICABLE REQUIREMENT REPORT (FORM 5-K2)</b>
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### Emission Unit Description: Boiler 3

Pollutant	Unit of Measure	Measured Emission Rate	Emission Rate Limit	Specific Source Test or Monitoring Record Citation	Date of Test
Carbon Monoxide - CO	ppm @ 3% O <sub>2</sub>	459	1696 Three boiler average	EPA Method 10	6/21/21 and 6/22/21
Carbon Monoxide - CO	lbs/hr	100	793 Total all three boilers	EPA Method 10	6/21/21 and 6/22/21
Ammonia - NH <sub>3</sub>	ppm @ 3% O <sub>2</sub>	20.6	28	SCAQMD 207.1 Modified	6/21/21 and 6/22/21
Oxides of Sulfur - SO <sub>2</sub>	ppm @ 3% O <sub>2</sub>	1.1	24	EPA Method 6C	6/21/21 and 6/22/21
Oxides of Sulfur - SO <sub>2</sub>	lbs/hr	0.6	45 Total all three boilers	EPA Method 6C	6/21/21 and 6/22/21
Filterable Particulate	gr/dscf @ 3% O <sub>2</sub>	0.0030	0.014	CARB Method 5	6/21/21 and 6/22/21
Total Particulate	lbs/hr	2.3	20	CARB Method 5	6/21/21 and 6/22/21
Nonmethane Hydrocarbons	ppm @ 3% O <sub>2</sub>	9.6	191	EPA Method 25A & EPA Method 18	6/21/21 and 6/22/21
Nonmethane Hydrocarbons	lbs/hr	0.9	89 Total all three boilers	EPA Method 25A & EPA Method 18	6/21/21 and 6/22/21
Mercury – Hg*	lbs/MMBtu	<1.34 E-6	5.76 E-6	EPA Method 29	6/21/21 and 6/22/21
Hydrochloric Acid – HCl*	lbs/MMBtu	0.0002	0.022	EPA Method 26A	6/21/21 and 6/22/21
Filterable Particulate*	lbs/MMBtu	0.0029	0.037	CARB Method 5	6/21/21 and 6/22/21

\*As per Condition 112 of the permit, testing results are less than 75% of the limit

**PACIFIC GAS AND ELECTRIC COMPANY**

**ATTACHMENT 3**

**Woodland Biomass Air Quality Attestation**

**(revised)**

# Woodland Biomass Power, LLC

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July 22, 2022

Via Electronic Submission

PG&E  
Attn: Energy Contract Management & Settlements  
77 Beale Street  
San Francisco, CA 94105-1702

Subject: Bioenergy Renewable Auction Mechanism Power Purchase Agreement (“RAM PPA”) by and between PG&E (“Buyer”) and Woodland Biomass Power, LLC., a California limited liability company (“Seller”), dated September 20, 2021 – Seller’s Air Quality Attestation

Dear Sir or Madam:

Pursuant to Section 3.11 of the RAM PPA, Seller attests that the Project is not in compliance with all applicable air pollution and control requirements for the period beginning December 1, 2021 and ending May 31, 2022. Seller hereby represents and warrants that:

1. This Air Quality Attestation is submitted on or prior to the semiannual air quality attestation due date as specified in Section 3.11.
2. Seller was not in compliance with all applicable air pollution control requirements for the period.
3. List of non-compliances:

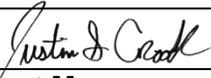
In December 2021 the CEMS was experiencing intermittent calibration issues for which breakdown reports were submitted for SO<sub>2</sub> and O<sub>2</sub>. The capillary and flash lamp were replaced, along with a cell in the stack which reads O<sub>2</sub> as part of the troubleshooting. As a result of this troubleshooting, the CEMS was repaired and brought back into compliance on 12/30/21.

A deviation report was also submitted regarding Q4 2021 Offsets. Offset fuel had been procured for the quarter, however very late into the quarter it was realized that one of the new vendors was outside of the air basin, therefore did not qualify for offset fuel. Wheat straw was purchased within the quarter to make up the offset shortage, however it was not until Q1 2022 that the fuel was brought across the scales. The final offset fuel for Q4 2021 came across the scales on March 14, 2022. The facility was back into compliance on 1/1/2022 at the start of the next quarter.

Compliance with the Project’s applicable air quality and control requirements is documented in the attached Air Pollution Report. Buyer may request additional information to

accommodate reporting and demonstrate Seller's compliance with air pollution and control requirements.

Capitalized terms used but not otherwise defined in this letter have the meanings set forth in the RAM PPA. Authorized signature from the Seller certifies that the Seller has the knowledge and authority to attest that the information on this form is true and correct.

Seller	<b>Woodland Biomass Power, LLC</b>
Print Name	<b>Justin Crook</b>
Signature	
Title	<b>Plant Manager</b>
Date	<b>7/22/2022</b>

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

AT&T  
Albion Power Company

Alta Power Group, LLC  
Anderson & Poole

Atlas ReFuel  
BART

Barkovich & Yap, Inc.  
Braun Blasing Smith Wynne, P.C.  
California Cotton Ginners & Growers Assn  
California Energy Commission

California Hub for Energy Efficiency  
Financing

California Alternative Energy and  
Advanced Transportation Financing  
Authority  
California Public Utilities Commission  
Calpine

Cameron-Daniel, P.C.  
Casner, Steve  
Center for Biological Diversity

Chevron Pipeline and Power  
City of Palo Alto

City of San Jose  
Clean Power Research  
Coast Economic Consulting  
Commercial Energy  
Crossborder Energy  
Crown Road Energy, LLC  
Davis Wright Tremaine LLP  
Day Carter Murphy

Dept of General Services  
Don Pickett & Associates, Inc.  
Douglass & Liddell

East Bay Community Energy Ellison  
Schneider & Harris LLP  
Engineers and Scientists of California

GenOn Energy, Inc.  
Goodin, MacBride, Squeri, Schlotz &  
Ritchie  
Green Power Institute  
Hanna & Morton  
ICF  
International Power Technology

Intertie

Intestate Gas Services, Inc.  
Kelly Group  
Ken Bohn Consulting  
Keyes & Fox LLP  
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated  
Waste Management Task Force  
MRW & Associates  
Manatt Phelps Phillips  
Marin Energy Authority  
McClintock IP  
McKenzie & Associates

Modesto Irrigation District  
NLine Energy, Inc.  
NRG Solar

OnGrid Solar  
Pacific Gas and Electric Company  
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

Redwood Coast Energy Authority  
Regulatory & Cogeneration Service, Inc.  
SCD Energy Solutions  
San Diego Gas & Electric Company

SPURR  
San Francisco Water Power and Sewer  
Sempra Utilities

Sierra Telephone Company, Inc.  
Southern California Edison Company  
Southern California Gas Company  
Spark Energy  
Sun Light & Power  
Sunshine Design  
Stoel Rives LLP

Tecogen, Inc.  
TerraVerde Renewable Partners  
Tiger Natural Gas, Inc.

TransCanada  
Utility Cost Management  
Utility Power Solutions  
Water and Energy Consulting Wellhead  
Electric Company  
Western Manufactured Housing  
Communities Association (WMA)  
Yep Energy