

SAN JOSE CLEAN ENERGY
(An Enterprise Fund of the City of San José)

Independent Accountant's Report on
Applying Agreed-Upon Procedures

For the Year Ended June 30, 2021



Certified
Public
Accountants

SAN JOSE CLEAN ENERGY
(An Enterprise Fund of the City of San José)
For the Year Ended June 30, 2021

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Independent Accountant's Report

Honorable City Council and
Risk Oversight Committee
San José, California

We have performed the procedures enumerated below on the City of San Jose's (City) compliance with the Clean Energy Risk Management Regulations effective November 19, 2020 for the year ended June 30, 2021. The City's management is responsible for the City's compliance with those requirements.

The City's Finance Department, Community Energy Department (CED), City Attorney's Office, and the Office of the City Auditor have agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of assisting specified parties in evaluating whether the City complied with the Clean Energy Risk Management Regulations effective October 3, 2019 and November 19, 2020, as applicable, for the year ended June 30, 2021. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The procedures and the associated findings are as follows:

1. We obtained the Northern California Power Agency (NCPA) and Weekly Management Reports for the last full week of each quarter for the year ended June 30, 2021 and reviewed the reports for regular update of load and resources forecasts as evidence of monitoring and measuring the supply portfolio against estimated demand.

Finding: No deviations were found as a result of obtaining the NCPA reports for the last full week of each quarter. However, we are unable to review load and resource balance reports that correspond to the same NCPA reporting period.

2. We obtained the Risk Management Regulations (RMR) Concentration Report as of December 31st and June 30th and reviewed energy confirmation for counterparties that have a 10% or higher concentration rate to ensure that the City has complied with the concentration limits identified in Section 15.2 of the RMR.

Finding: We are unable to verify concentration limits, as there are no calculation of quantity MWh of the outstanding commitments to a counterparty divided by the expected wholesale load requirement MWh of the applicable period.

3. We obtained the Approved Counterparty logs for counterparties SJCE has entered into agreements with for the year ended June 30, 2021 and reviewed supporting documents to show that the City has managed counterparty liquidity risk by:
 - a) Regular, up-to-date credit evaluations
 - b) Requiring collateral in accordance with the RMR.

Finding: No deviations were found as a result of applying the procedure.

4. We obtained the Banking Services Agreement with Wells Fargo Bank and the bank statement balance as of June 30, 2021 and determined that the City has managed custodial credit risk by keeping deposits at FDIC insured institutions below insurance thresholds, or maintaining minimum 100% collateral, and actively monitoring the creditworthiness of the custodian.

Finding: No deviations were found as a result of applying the procedure.

5. We obtained the Approved Counterparty Log and the Finance Counterparty Credit Analysis Procedures (Procedures) as of June 30, 2021 and reviewed to determine if counterparty credit assessment and monitoring were performed by reviewing evidence of counterparty diversification, credit risk premium, covenants, posting collateral.

Finding: No deviations were found as a result of applying the procedure.

6. We judgmentally selected ten individual Transmittal Sheets from each quarter of the year ended June 30, 2021 and determined whether the executed transactions are within transaction term limits and transaction volume limits authorized in Appendix 4 of the RMR.

Finding: No deviations were found as a result of applying the procedure. Based on the contract executed date, only four transmittal sheets were selected for the quarter ended March 31, 2021, as only four transmittal sheets were executed within the quarter ended March 31, 2021. Therefore, we selected a total of 34 items for this procedure.

7. We obtained the Revolving Credit Agreement with Barclays Bank and the City's bank statements for the year ended June 30, 2021 and determined whether the City funded an operating reserve, and ensured the department has a credit facility to support cash flow needs.

Finding: No deviations were found as a result of applying the procedure.

8. We obtained and reviewed agreements with and invoices for power purchase and sale agreements for the months of December 2020 and June 2021 ensuring (a) counterparty representatives are authorized by the counterparty and (b) long-term power purchase and sale agreements are approved as to form by the City Attorney and reviewed by appropriate legal and market experts.

Finding: We are unable to verify for two out of fifteen short-term power purchase agreements whether the City Attorney's Office reviewed and approved the power purchase agreements, as there is no documentation indicating reviews or approvals kept on file. There are no long-term power purchase and sale agreements entered into for the months of December 2020 and June 2021. No other deviations were found as a result of applying the procedure.

9. We obtained a copy of the Load Resource Balance for the months of December 2020 and June 2021 and recalculated the coverage ratios reported by the City for the purposes of complying with the Recommended Coverage per Appendix 9 (see attached Schedule A) of the RMR.

Finding: We reviewed the Load Resource Balance for the months of December 2020 and June 2021, dated December 23, 2020 and June 30, 2021, respectively. There are no reported Rolling four years forward and beyond coverage ratios.

In addition, the City did not meet the minimum coverage per Appendix 9 of the RMR for the following:

| December 2020 | Period | Actual Coverage | Minimum Coverage | Maximum Coverage |
|----------------------------|----------------------------|------------------------|-------------------------|-------------------------|
| Rolling Six Months Forward | January 2021 – June 2021 | 60 - 71% | 80% | 115% |
| Rolling One Year Forward | April 2021 – December 2021 | 59 – 69% | 70% | 110% |

| June 2021 | Period | Actual Coverage | Minimum Coverage | Maximum Coverage |
|----------------------------|---------------|------------------------|-------------------------|-------------------------|
| Rolling Six Months Forward | December 2021 | 78% | 80% | 115% |
| Rolling One Year Forward | June 2022 | 63% | 70% | 110% |

10. We compared the description of the types of Energy products listed in the Expected Power Cost Workbook for the months of December 2020 and June 2021 with the list of Energy products that are listed as authorized and consistent with the Appendix 6 of the RMR.

Finding: No deviations were found as a result of applying the procedure.

11. We obtained Expected Power Cost Workbook, Power Contract Tracking Report, and Approved Counterparty Log Master Workbook for the months of December 2020 and June 2021; judgmentally selected 10 transactions; and obtained additional documentation to determine whether the City meets the permitted transactions and approved product requirements of the RMR, as follows:

- a) Transactions are duly authorized and within risk limits, and shall not cause individual counterparty credit limits to be exceeded.
- b) Transactions shall utilize contract terms intended to minimize the risk of loss if a counterparty fails to deliver, take delivery or pay for transactions provided.
- c) Transactions are executed and documented following standardized procedures.
- d) Transactions are approved as to form by the City Attorney’s Office.

Finding: We are unable to verify for nine out of twenty transactions whether the City Attorney’s Office approved the transactions, as there is no documentation indicating approvals kept on file. No other deviations were found as a result of applying the procedure.

12. Based on the sample of transactions selected in procedure 11 above, if unauthorized transactions were observed, we reviewed the appropriate deviations report as required in Section 5.4 of the RMR as amended from time to time.

Finding: No deviations were found as a result of applying the procedure.

13. We reviewed the Management Reports listed in Appendix 7 (See attached Schedule B) of the RMR, such as Standing RMR Reports, Bilateral RA Transaction Reports, and Procurement and Regulatory Update Reports for the last month of each quarter, to determine whether SJCE complied with the reporting requirements, report frequency, primary responsibility, approval and deadlines.

Finding: We noted during our review of the Management Reports listed in Appendix 7 of the RMR, there were a total of nine separate reports to be completed. The following reports were not completed and approved for the periods selected below:

| Report | Frequency | Period not completed |
|--------------------------------|------------------|---|
| Credit Exposure to LOC Issuers | Monthly | For the months of August 2020 and November 2020 |

For the following reports listed, we are unable to verify whether it was reviewed and approved by the City, as there is no documentation indicating reviews or approvals kept on file:

| Report | Frequency | Period not approved |
|---|------------------|--|
| Load and Resource | Quarterly | All quarters for the fiscal year June 30, 2021 |
| Concentration Balance | Monthly | All last month of each quarter for the fiscal year June 30, 2021 |
| Portfolio Performance (MTM) | Monthly | All last month of each quarter for the fiscal year June 30, 2021 |
| Credit Limit Status by counterparty and Master Agreements | Monthly | All last month of each quarter for the fiscal year June 30, 2021 |
| Coverage Ratio – Procurement Report | Monthly | All last month of each quarter for the fiscal year June 30, 2021 |
| Credit Exposure to LOC Issuers | Monthly | All last month of each quarter for the fiscal year June 30, 2021 |

14. We reviewed an individual transaction from each quarter of the year ended June 30, 2021 and determined whether the transaction includes formal and official documentation by the City as follows:
- a) Competitive bidding or ROC approved variance authorizing bilateral negotiations.
 - i. SJCE front office manages a Request for Offers (RFO) inbox for the purposes of capturing bid solicitations.
 - b) Written commitment to the transaction
 - i. SCJE front office manages an RFO inbox for the purposes of capturing bid solicitations.
 - c) Confirmation the transaction with the counterparty with a written and executed confirmation
 - i. All transactions with the counterparty are memorialized with a written and executed confirmation.
 - d) Authorization/Approval
 - i. Each confirmation includes a cover sheet to ensure appropriate authorization/approvals are in place.
 - e) Actual product delivery
 - i. Both the Northern California Power Agency (NCPA) and the Middle Office review expected power costs and confirm the quantities match information included on confirmation. NCPA confirms the actual delivery of energy products prior to SJCE submitting invoices for payment.
 - f) Billing and settlement
 - i. Both NCPA and the Middle Office review expected power costs and confirm the quantities match information included on confirmation. NCPA confirms the actual delivery of energy products prior to SJCE submitting invoices for payment.

Finding: We are unable to observe whether competitive bidding was approved for two out of four selections, as the two deviations did not have documentation indicating competitive bidding approvals kept on file. No other deviations were found as a result of applying the procedure.

15. We obtained listing of employees who are engaged in approved product transactions and consultants performing services for SJCE as of June 30, 2021 and reviewed completed Form 700 – Community Energy Classifications annual conflict of interest filings.

Finding: No deviations were found as a result of applying the procedure.

We were engaged by the City to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the City's compliance with the Clean Energy Risk Management Regulations effective November 19, 2020 for the year ended June 30, 2021. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the City and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

The City's response to the deviations identified as a result of our procedures is described in the management response starting page 11. The City's response was not subjected to the procedures applied in this agreed-upon procedures engagement and, accordingly, we express no opinion on it.

This report is intended solely for the information and use of the City Council, Risk Oversight Committee, the City Auditor, and Finance Department and is not intended to be and should not be used by anyone other than these specified parties.

Macias Gini & O'Connell LLP

Walnut Creek, California
November 17, 2021

SAN JOSE CLEAN ENERGY
(An Enterprise Fund of the City of San José)
Schedule A
For the Year Ended June 30, 2021

ENERGY RISK MANAGEMENT REGULATION APPENDIX 9
RECOMMENDED COVERAGE

SJCE will manage risks associated with its Load Obligation through procurement of energy up to four years ahead consistent with Table 1 below, and through medium and long-term contracts up to 25 years in length that are consistent with SJCE’s Integrated Resource Plan (IRP). To access the market at different times, SJCE will hedge its load obligation by soliciting energy supply offers at regular intervals during favorable buying periods during the year (focusing on Spring and Fall). The Director of Community Energy, or designee, will review each solicitation; solicitation reviews shall cover pre-solicitation portfolio positions, expected coverage, procurement limits and market analysis. Supply offers will be selected with respect to the risks outlined in this document (i.e. price risk, counter party credit worthiness, concentration risk, etc.).

SJCE will seek to achieve coverage ratios consistent with Table 1 Coverage Thresholds. SJCE will apply coverage ratios within the ranges set forth in Table 1 taking into account market and system conditions during particular time periods, such as higher risks of price spikes during the Summer and early Fall, and opportunities to take advantage of low prices from favorable hydro conditions during the Spring, and schedules for natural gas storage reports.

Table 1 Coverage Thresholds

| | Minimum Coverage | Maximum Coverage |
|---------------------------------------|------------------|------------------|
| Rolling Six Months Forward | 80% | 115% |
| Rolling One Year Forward | 70% | 110% |
| Rolling Two and Three Years Forward | 30% | 90% |
| Rolling Four Years forward and Beyond | 30% | 50% |

From time to time, the Front Office staff may recommend procurement strategies outside of these Coverage Thresholds for ROC review and approval.

The Front Office shall prepare an Integrated Resource Plan (IRP) every two years in accordance with State law requirements and City policy. The IRP shall be presented to City Council for approval and filed with the California Public Utilities Commission. The Front Office shall propose long term transactions for approval by City Council and the ROC as appropriate and consistent with the requirements of the approved IRP.

SAN JOSE CLEAN ENERGY
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Schedule B
For the Year Ended June 30, 2021

APPENDIX 7
MANAGEMENT REPORTS

1. Management Reports

The following energy risk management reports shall be developed and presented as further described in the following table:

Report Audience: **ROC**

| Management Report | Primary Responsibility | | | Report Frequency | | | | | | Approval |
|--|------------------------|--------|------|------------------|---------|-----------|--------|-----------|-----------|---|
| | Front | Middle | Back | Weekly | Monthly | Quarterly | Annual | Bi-Annual | As Needed | |
| a. Load and Resource | X | | | | | X | | | | CED Deputy Director of Power Resources |
| b. Concentration Balance | | X | | | X | | | | | CED Division Manager of Risk Management, Contracts and Administration |
| c. Portfolio Performance (MTM) | | X | | | X | | | | | CED Division Manager of Risk Management, Contracts and Administration |
| d. Exceptions Report | | X | | | | | | | X | CED Division Manager of Risk Management, Contracts and Administration |
| e. Annual Regulations Update | | X | | | | | X | | | CED Division Manager of Risk Management, Contracts and Administration |
| f. Credit Limit Status by Counterparty and Master Agreements | | X | | | X | | | | | CED Division Manager of Risk Management, Contracts and Administration |
| g. Coverage Ratio – Procurement | X | | | | X | | | | | CED Deputy Director of Power Resources |
| h. Integrated Resource Plan | X | X | X | | | | | | X | CED Deputy Director of Power Resources |
| i. Credit Exposure to LOC Issuers | | X | | | X | | | | | CED Division Manager of Risk Management, Contracts and Administration |

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For the Year Ended June 30, 2021

Report Audience: **SJCE Management**

| Management Report | | Primary Responsibility | | | Report Frequency | | | | | | Approval |
|-------------------|---|------------------------|--------|------|------------------|---------|-----------|--------|------------|-----------|---|
| | | Front | Middle | Back | Weekly | Monthly | Quarterly | Annual | Bi- Annual | As Needed | |
| a. | Load and Resource | X | | | X | | | | | | CED Deputy Director of Power Resources |
| c. | Portfolio Performance (MTM) | | X | | X | | | | | | CED Division Manager of Risk Management, Contracts and Administration |
| f. | Credit Limit Status by Counterparty and Master Agreements | | X | | | X | | | | | CED Division Manager of Risk Management, Contracts and Administration |

Report Audience: **Front & Back Office**

| Management Report | | Primary Responsibility | | | Report Frequency | | | | | | Approval |
|-------------------|---|------------------------|--------|------|------------------|---------|-----------|--------|------------|-----------|---|
| | | Front | Middle | Back | Weekly | Monthly | Quarterly | Annual | Bi- Annual | As Needed | |
| f. | Credit Limit Status by Counterparty and Master Agreements | | X | | | X | | | | | CED Division Manager of Risk Management, Contracts and Administration |

SAN JOSE CLEAN ENERGY
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Schedule B
For the Year Ended June 30, 2021

1.1. Description of Management Reports

- a. Load and Resource: The Front Office produces the Load and Resource Balance report detailing total resources by source as compared to total actual load. This report shows supply surpluses and shortages. The Load Resource report is updated weekly and reviewed with SJCE management. It is also included on ROC meeting agendas as a consent item on a quarterly basis.
- b. Concentration Balance: The Middle Office reports concentration by counterparty in terms of total covered portfolio, budget and load concentration. The Concentration Reports are updated monthly and is included on ROC meeting agendas as a standing consent item.
- c. Portfolio Performance (MTM): A Middle Office report comparing the cost of the portfolio of contracts to the current market value of the portfolio (tracking what SJCE paid for the contract to what it is worth now). This is also known as MTM and is used to monitor collateral needs. The Portfolio Performance report is updated weekly and reviewed with SJCE management. It is also included on ROC meeting agendas as a standing consent item.
- d. Exceptions Report: A Middle Office report summarizing current exception and violation reports. The Exception Report is developed and presented to the ROC as needed.
- e. Annual Regulations Update: A Middle Office report providing an annual review of policies and procedures of the Risk Management Regulations and recommendations for needed updates. The Annual Regulations Update report is developed annually. It is included on ROC meeting agendas as a consent item on an annual basis.
- f. Credit Limit Status by Counterparty and Master Agreements: A Middle Office report showing counterparty credit limits, credit used, credit remaining, as well as current set of approved master agreements. Special flagging of counterparties nearing their credit limits should also be included. The Credit Limit Status by Counterparty report is presented to the Front Office and Back Office staff, as well as to SJCE's management on a monthly basis. It is also included on ROC meeting agendas as a standing consent item.
- g. Coverage Ratio – Procurement Report: A Front Office report detailing the coverage ratio and trading strategies for the next 3 years. The Procurement report is developed monthly. It is included on ROC meeting agendas as a standing consent item.
- h. Integrated Resource Plan: This is a plan prepared every few years that shows long-term supply and resources plan.
- i. Credit Exposure and Credit Quality to LOC Issuers: A Middle Office report tracking credit exposure and credit quality to LOC issuers at the portfolio level. The LOC Issuers report is prepared monthly. It is included on ROC meeting agendas as a standing consent item.

TO: MACIAS GINI & O'CONNELL, LLP

FROM: Lori Mitchell

SUBJECT: SEE BELOW

DATE: November 17, 2021

Approved

Date

SUBJECT: RESPONSE TO INDEPENDENT ACCOUNTANT'S REPORT ON THE CITY OF SAN JOSE'S COMPLIANCE WITH CLEAN ENERGY RISK MANAGEMENT REGULATIONS FOR THE YEAR ENDED JUNE 30, 2021

BACKGROUND

The Administration has reviewed the Independent Accountant's report on the City of San José's compliance with Clean Energy Risk Management Regulations (*Effective: October 3, 2019 and November 19, 2020, as applicable*) for the year ended June 30, 2021. This memorandum details the Administration's response to the findings related to several procedures detailed in the report, along with a discussion of the process improvements currently underway. As this review was conducted immediately following the review of the City's compliance with Clean Energy Risk Management Regulations (*Effective: October 3, 2019*) for the year ended June 30, 2020, there are findings outlined in this report that were also observed and detailed in the report for the year ended June 30, 2020. The Administration greatly appreciates the work of the City Auditor and the team at Macias Gini & O'Connell, LLP (MGO) for this report.

PROCEDURES AND PROCESS IMPROVEMENTS

Procedure 1: The Administration provided MGO with Northern California Power Agency Weekly Reports and Load Resource Balances for the last full week of each quarter for the year ended June 30, 2021. However, these reports did not correspond to the same date periods for each quarter of the year ended June 30, 2021. The Administration will seek to ensure the reports that are provided as part of this procedure represent the same reporting period for future fiscal years.

Procedure 2: The Concentration reports provided to MGO were on a cost basis (rather than on a quantity of energy (megawatt-hour, or MWh) basis) for December 2020 and on a quantity MWh basis for June 2021. The Administration will seek to ensure that the reports provided as part of

this procedure represent the calculation methodology outlined in the Clean Energy Risk Management Regulations (RMR). The Administration will also generate additional reports for quantity MWh and expected wholesale load requirement as part of procedure reviews for future fiscal years to facilitate verification of concentration limits.

Procedure 8: For the short-term power purchase agreements noted in the finding for this procedure, the Administration did not provide documentation of City Attorney's Office review and approval for two of these agreements as obtaining City Attorney's Office signature approval on short-term power purchase agreements was not included as part of the contract execution process until December 2020. Since that time, the Administration is now requiring City Attorney's Office signature approval on all short-term power purchase agreements as part of the power purchase agreement execution process. It is important to note that the master enabling agreements that contain the majority of the required terms and conditions pertaining to the City's short-term transactions with energy suppliers are always reviewed and approved by the City Attorney's Office. While it has also been standard practice for the City Attorney's Office to review each short-term confirmation agreement containing the specific business terms (e.g., product type, price, quantity, etc.) of each transaction, the City Attorney's Office did not begin formally approving/signing these confirmation agreements until December 2020.

Procedure 9: The Administration has observed that the review requirements for this procedure do not align with the Recommended Coverage thresholds outlined in Appendix 9 of the RMR. The procedure requires the Load Resource Balance for the months of December 2020 and June 2021 be used to re-calculate the coverage ratios reported by the City for purposes of complying with the Recommended Coverage per Appendix 9.

As noted in the MGO finding for Procedure 9, the Load Resource Balance does not provide coverage ratio for 'Rolling four years forward and beyond'. To fully support the accurate re-calculation of coverage ratios for this procedure, the Administration will amend Procedure 9 to note the use of the Power Contract Tracker (PCT) rather than the Load Resource Balance. The PCT tracks all executed power purchase agreements and provides data for all the years, thereby allowing for the accurate re-calculation of coverage ratios, as outlined in Appendix 9 of the RMR.

It is important to note that while the City strives to achieve the recommended coverage ratios outlined in Appendix 9, actual coverage ratios may vary from the recommended coverage ratios due to a variety of factors, including weather variations, changes in economic conditions, variations in energy price forecasts and changes in customer energy demands. For example, beginning in Spring 2020, the City adjusted its energy procurement strategy to account for the potential impact on energy demand due to the COVID-19 pandemic. This was done in order to avoid potential over-procurement in the face of the global pandemic and this change resulted in actual coverage ratios below the minimum coverage for periods as reported in December 2020 and June 2021. The potential impact of the pandemic on the expected load/energy demand of the City was presented to the ROC in Summer 2020.

Procedure 11: As noted above for Procedure 8, the Administration did not provide documentation of City Attorney's Office review and approval for many short-term power purchase agreements for the year ended June 30, 2021 due to the fact that the City Attorney's Office signature approval was not included in the short-term power purchase agreement execution process until beginning December 2020. The Administration is now including City Attorney's Office signature approval on all short-term power purchase agreements as part of the execution process.

Procedure 13: The Community Energy Department is working to improve the process and procedures for developing and approving the energy risk management reports outlined in Appendix 7 of the RMR. As part of the annual process to amend the RMR for the fiscal year ending June 30, 2022, which is currently underway, a review of the management reports listed in Appendix 7 will be performed to ensure they align with operational needs and develop standard procedures to ensure the reports are provided to the appropriate audience and produced according to the frequency outlined in Appendix 7. An internal report approval process will also be developed to ensure reports are reviewed and approved per the requirements of Appendix 7.

Procedure 14: The Administration did not provide sufficient documentation indicating competitive bidding occurred on two out of four transactions selected for review. Although all four transactions did result from competitive bidding, the Community Energy Department will work to improve internal operating procedures for documenting the process for evaluating and selecting bids to ensure sufficient documentation will be available as part of procedure reviews for future fiscal years.

CONCLUSION

The Administration thanks the City Auditor's Office and the team at MGO for the comprehensive review of the City's compliance with Clean Energy Risk Management Regulations. We appreciate the hard work and professionalism in conducting this review. Serving as the administrator of San José Clean Energy, the Community Energy Department began operations in 2018 and continues to explore opportunities to build and strengthen its operating procedures. The findings contained in this report will help inform many of the process improvements the City will seek to implement in the coming months.

/s/

LORI MITCHELL

Director, Community Energy Department

For questions, please contact Zachary Struyk, Assistant Director of Community Energy, at (408) 535-4868.