



San Francisco Public Utilities Commission

PROGRAMMATIC POST-ISSUANCE VERIFICATION LETTER

WATER INFRASTRUCTURE CRITERIA OF THE CLIMATE BONDS STANDARD

Type of engagement: Assurance Engagement

Period engagement was carried out: March 2025 – December 2025

Approved verifier: Sustainalytics

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Scope and Objectives

In July 2024, the San Francisco Public Utilities Commission (“SFPUC” or the “Issuer”) issued the 2024 Series A and Series C green bonds (collectively the “2024 Green Bonds”) to finance or refinance projects under the Sewer System Improvement Program (SSIP).

In January 2025, the SFPUC engaged Sustainalytics to review the projects financed in 2024 from the SFPUC’s 2024 Green Bonds (the “Nominated Projects”) and provide an assessment as to whether the Nominated Projects meet the Post-Issuance Requirements of the Climate Bonds Standard Version 2.1.

The Nominated Projects include:

- Water Treatment
 - Sewer System Improvement Projects

Schedule 1 provides details of the Nominated Projects and disbursement of proceeds.

Post-Issuance Evaluation Criteria

Post-issuance Requirements of the Climate Bonds Standard Version 2.1:¹

- Part A: General Requirements – All the requirements in Part A shall be met to be eligible for post-issuance certification.
- Part B: Eligible Projects & Assets – Part B requirements shall be met based on the projects and assets associated with the bond and the specified eligibility criteria.
- Part C: Requirements for Specific Bond Types – Part C requirements shall be met to be eligible for post-issuance certification and are used selectively, depending on the type of bond in question.

Issuing Entity’s Responsibility

The SFPUC is responsible for providing accurate information and documentation relating to the details of projects, including description, total development cost of each project and disbursed amounts.

¹ Climate Bond Initiative, Climate Bond Standard v2.1 at: <https://www.climatebonds.net/climate-bonds-standard-v21-0>

Independence and Quality Control

Sustainalytics, a leading provider of ESG and corporate governance research and ratings to investors, conducted the verification of the 2024 Green Bonds to provide an independent opinion on its conformance with the Post-Issuance Requirements of the Climate Bonds Standard.

Sustainalytics has relied on the information and the facts presented by the SFPUC with respect to the Nominated Projects. Sustainalytics is not responsible, nor shall be held liable, for any inaccuracies in the opinions, findings or conclusions herein due to incorrect or incomplete data provided by the SFPUC.

Sustainalytics makes all efforts to ensure the highest quality and rigor during its assessment process and enlisted its Sustainability Bonds Review Committee to provide oversight over this assessment.

Verifier's Responsibility

Sustainalytics conducted the verification in accordance with the Climate Bonds Standard Version 2.1 and with International Standard on Assurance Engagements 3000 (ISAE 3000) – Assurance Engagements other than Audits or Reviews of Historical Information.

The work undertaken as part of this engagement included conversations with relevant SFPUC employees and review of relevant documentation to assess conformance of the SFPUC's 2024 Green Bonds with the Programmatic Post-Issuance Requirements of the Climate Bonds Standard Version 2.1

Exceptions

No exceptions were identified. All projects meet the Post-Issuance Requirements of the Climate Bonds Standard Version 2.1.0 and Water Infrastructure criteria.

Conclusion

Based on the limited assurance procedures conducted and evidence obtained, nothing has come to Sustainalytics' attention that causes us to believe that, in all material respects, the allocation of the following 2024 Green Bonds are not in conformance with the Post-Issuance Requirements of the Climate Bonds Standard:

- USD 396,143,732.08 from 2024 Series A Green Bond
- USD 558,759,583.84 from 2024 Series C Green Bond

Detailed Findings

Eligibility Criteria	Procedure Performed	Factual Findings	Error or Exceptions Identified
Compliance with Mitigation Criteria	Verification of the nine projects to determine if the Mitigation Criteria was met.	Confirmation that the nine projects complied with the Mitigation requirements mentioned in the Water Infrastructure Criteria of the Climate Bond Standards, as detailed in Appendix 1.	None
Compliance with Adaptation and Resilience Criteria	<p>Verification of the nine projects to determine if the Adaptation and Resilience criteria was met.</p> <p>Verification of the scorecard for four categories:</p> <ol style="list-style-type: none"> 1. Allocation 2. Governance 3. Technical Diagnostics 4. Adaptation Plan 	<p>Confirmation that the nine projects complied with the Adaptation and Resilience requirements mentioned in the Water Infrastructure Criteria of the Climate Bond Standards as detailed in Appendix 2.</p> <p>Verification of the scorecard:</p> <ol style="list-style-type: none"> 1. Allocation: 17/18 2. Governance: 12.5/14 3. Technical Diagnostics: 22/23 4. Adaptation Plan: 5/5 	None
Compliance with Part A: General Requirements	Verification of the nine projects funded by the 2024 Green Bonds: 2024 Series A and C to determine if Part A: General Requirements were met.	All nine projects complied with the General Requirements as detailed in Schedule 2A and 2B.	None
Compliance with Part B: Eligible Projects & Assets	Verification of the nine projects funded by the 2024 Green Bonds: 2024 Series A and C to determine if projects fall into: i) one of the investment areas of the Climate Bonds Taxonomy; ii) meet the Water Infrastructure technical criteria.	All nine projects fall under the Water Infrastructure Criteria of the Climate Bond Taxonomy and meet the requirements of the Water Infrastructure Technical Criteria.	None
Compliance with Part C: Requirements for Specific Bond Types	Bond Type Applicable: Use of Proceeds Revenue Bond.	The requirements of Project Holding, Settlement Period and Earmarking have been met.	None

Schedule 1: Overview of Nominated Projects

Table 1: Details of the Nominated Projects and Assets that received 2024 Series A Green Bond proceeds

Asset category	Project Sub-category	Amount (USD)
Sewage Water Treatment Infrastructure	Biosolids-Digester Facilities Project	396,143,732.08
Total Proceeds Allocated		396,143,732.08

Table 2: Details of the Nominated Projects and Assets that received 2024 Series C Green Bond proceeds

Asset category	Project	Amount (USD)
Sewage Water Treatment Infrastructure	Biosolids-Digester Facilities Project	558,759,583.84 ²
	Central Bayside System Improvements	
	Urban Watershed Assessment	
	Flood Resilience-Hydraulic	
	SSIP Program-Wide Management	
	Stormwater Management	
	Treatment Plant Improvement	
	Collection System Improvements	
Total Proceeds Allocated		558,759,583.84

² SFPUC has informed Sustainalytics that the proceeds from the 2024 Series C Green Bond have been fully allocated to the overall Sewer System Improvement Program (SSIP). Sub-category level allocation details will be provided in the next post-issuance report.

Schedule 2A: Post-Issuance Requirements of the Climate Bonds Standard

Nominated Projects & Assets	<p>4.1 Statement on the environmental objectives of the bond</p> <p>4.2 Nominated Projects meet the Climate Bonds criteria</p> <p>4.3 Confirmation that Nominated Projects and Assets will not be nominated to other Climate Bonds</p>
Use of Proceeds	<p>5.1 Net Proceeds of the bond allocated to the Nominated Projects</p> <p>5.2 Funds allocated to Nominated Projects within 24 months of issuance of the bond</p> <p>5.3 Estimate of the share of the Net Proceeds used for financing and re-financing</p> <p>5.4 Net Proceeds of the bond shall be tracked by the Issuer following a formal internal process</p> <p>5.5 Net Proceeds of the bond shall be no greater than the total investment or the total Fair Market Value of the Nominated Projects & Assets at the time of issuance</p>
Non-Contamination of Proceeds	<p>6.1 Tracking of proceeds</p> <p>6.2 Managing of unallocated proceeds</p> <p>6.3 In the case of a Force Majeure, the Issuer may apply to the Climate Bonds Standard Board for an extension to the asset allocation period</p>
Confidentiality	<p>7.1 Information about the Nominated Projects & Assets provided to the Verifier and to the Climate Bonds Standard Board</p> <p>7.2 Issuer should disclose information about the bond and the Nominated Projects & Assets to the market</p>
Reporting Post-Issuance	<p>8.1 Report containing the list of Nominated Projects & Assets to which proceeds of the bond have been allocated</p>

Schedule 2B: Conformance to the Post-Issuance Requirements of the Climate Bonds Standard

Procedure Performed	Factual Findings	Error or Exceptions Identified
<p>Verification of Nominated Projects & Assets</p>	<p>4.1 The objective of the bond is to primarily use proceeds to finance or refinance projects within the Sewer System Improvement Program (SSIP) in accordance with the Water Infrastructure criteria.</p> <p>4.2 SFPUC's management confirms that the nominated projects meet the Eligibility Criteria.</p> <p>4.3 SFPUC's management confirms that the projects shall not be nominated to other Certified Climate Bonds unless distinct portions of the Nominated Projects and Assets are being funded by different Certified Climate Bonds or that the existing Certified Climate Bond is being refinanced via another Certified Climate Bond.</p>	<p>None</p>
<p>Verification of requirements specified under Use of Proceeds</p>	<p>5.1 Net Proceeds of the bond have been allocated to the 9 Nominated Projects.</p> <p>5.2 SFPUC's management has confirmed that funds have been allocated to Nominated Projects within 24 months of the issuance.</p> <p>5.3 SFPUC's management has confirmed that all Net Proceeds of the bond were used for financing only.</p> <p>5.4 SFPUC's management has confirmed that Net Proceeds of the bond has been tracked by the Issuer following a formal internal process.</p> <p>5.5 SFPUC's management has confirmed that the Net Proceeds of the bonds is no greater than the total investment in the Nominated Projects or the Total</p>	<p>None</p>

	Development Cost of the Nominated Projects.	
Verification of requirements specified under Non-Contamination of Proceeds	<p>6.1 SFPUC's management confirms that the proceeds have been segregated and tracked in a systematic manner and were exclusively used to finance Nominated Projects.</p> <p>6.2 SFPUC's management confirms that pending the investment of proceeds, they have been held in temporary investment instruments (i) that are cash, or cash equivalent instruments, within a Treasury function; or (ii) that do not include greenhouse gas intensive projects which are inconsistent with delivery of a low carbon and climate resilient economy.</p> <p>6.3 N/A</p>	None
Verification of requirements specified under Confidentiality	<p>7.1 SFPUC's management confirms that all relevant information about the Nominated Projects has been provided to the Verifier and to the Climate Bonds Standard Board to support the assessment of conformance with the Climate Bonds Standard.</p> <p>7.2 SFPUC's management confirms that all relevant information about the bond and the Nominated Projects has been disclosed to the market.</p>	None
Verification of requirements specified under Reporting Post-Issuance	<p>8.1 SFPUC's management has provided a report containing the list of Nominated Projects to which proceeds of the bond have been allocated (See Schedule 1).</p>	None

Annexure 1: CBI Water Infrastructure Criteria

Mitigation, Adaptation and Resilience under Approved Best Practice Standards Requirements

Appendix 1: Mitigation Requirements

Eligibility Criteria	Assessment
<p>For use of proceeds subject to a Mitigation Assessment, the water infrastructure projects are eligible for certification only if either:</p> <ul style="list-style-type: none"> a) No net GHG emissions impact is expected, and the issuer discloses the justification for this decision with supporting documentation; or b) A negative net GHG emissions impact is expected, and the issuer has estimated the GHG mitigation impact that will be delivered over the operational lifetime of the project or asset. This impact should be defined in terms of the decreased emissions or increased sequestration relative to a business-as-usual baseline. 	<p>The SFPUC has confirmed that per capita emissions related to wastewater have decreased by 8% over the asset's operational lifespan. This is in line with the Mitigation Criteria outlined in the Water Infrastructure Criteria.</p>

Appendix 2: Adaptation and Resilience Requirements

For Evaluation of Issuer’s Vulnerability Assessment Section 1: Allocation (To be completed for all water infrastructure assets)			
Criteria	Evidence (E) Disclose (D)	Max Score	Actual Score
<p>1.1 Are there accountability mechanisms in place for the management of water allocations that are effective at a sub-basin and/or basin scale?</p> <p>A mixture of state, federal, special commissions and agencies, and lower level organizations that manage water across the San Francisco Bay / Sacramento River Delta region.</p>	D	1	1
<p>1.2 Are the following factors considered in the definition of the available resource pool?</p> <ul style="list-style-type: none"> A. Non-consumptive uses (e.g., navigation, hydroelectricity) B. Environmental flow requirements C. Dry season minimum flow requirements D. Return flows (how much water should be returned to the resource pool, after use) E. Inter-annual and inter-seasonal variability F. Connectivity with other water bodies G. Climate change impacts <p>These factors are largely governed at the state level by the CA State Water Board, as well as a variety of specialty groups, such as SP PUC (refer to master water plan), federal and state navigation standards, SWB and US EPA environmental flow requirements (https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/deltaflow/final_rpt.shtml), CA energy governance</p>	E	7	<p>A = 1</p> <p>B = 1</p> <p>C = 1</p> <p>D = 1</p> <p>E = 1</p> <p>F = 1</p> <p>G = 1</p>
<p>1.3 Is there a distinction between the allocation regimes used in “normal” times and in times of “extreme/severe” water shortage?</p> <p>Yes, described here: http://www.sfwater.org/Modules/ShowDocument.aspx?documentID=8838 http://www.sfwater.org/Modules/ShowDocument.aspx?documentID=1055</p>	E	1	1
<p>1.4 Are arrangements in place to accommodate the potentially adverse impacts of climate change on the resource pool? (E.g., using best available science to plan for future changes in availability, undertaking periodic monitoring and updating of plans as climate science improves.)</p>	E	1	1

<p>The 2010 and 2015 Urban Water Management Plans both outline at chapter level impacts to date and alternative plans for handling crisis periods.</p>			
<p>1.5 Are there plans to define “exceptional” circumstances, such as an extended drought, that influence the allocation regime? (E.g., triggers water use restrictions, reduction in allocations according to pre-defined priority uses, suspension of the regime plan, etc.)</p> <p>Yes, see Urban Water Management Plans. See also a separate city/county plan: http://www.sfwater.org/modules/showdocument.aspx?documentid=4168</p>	E	1	1
<p>1.6 For international / transboundary basins, is there a legal mechanism in place to define and enforce water basin allocation agreements?</p> <p>N/A.</p>	D	1	N/A
<p>1.7 Are water delivery agreements defined on the basis of actual in situ seasonal/annual availability instead of volumetric or otherwise inflexible mechanisms?</p> <p>Yes. The State Water Board defines water rights in this way, so that in times of crisis such as severe droughts water shortages are shared proportionally among defined water users.</p>	E	1	1
<p>1.8 Has a formal environmental flow (e-flows)/sustainable diversion limits or other environmental allocation been defined for the relevant subbasin or basin? (If there is a pre-existing plan, then has the environmental flows program been updated to account for the new project?)</p> <p>There is an interagency group that has developed a Bay-Delta watershed management plan, which includes city, county, state, and federal entities. The plan is regularly updated. http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/deltaflow/final_rpt.shtml</p> <p>For the Tuolumne River aspect, a detailed SFPUC plan has been prepared: http://utrep.blogspot.com/2014/04/draft-oshaughnessydam-instream-flow.html</p>	E	1	1
<p>1.9 Have designated environmental flows / allocation programs been assured / implemented?</p> <p>Yes. See above.</p>	D	1	1
<p>1.10 Has a mechanism been defined to update the environmental flows plan periodically (e.g., every 5 to 10 years) in order to account for changes in allocation, water timing, and water availability?</p> <p>Yes. The Sewer System Management Plan is updated every two years. Sewer System Management Plan:</p>	E	1	1

https://www.sfpuc.gov/sites/default/files/about-us/SFPUCSewerSystemManagementPlan2021.pdf			
<p>1.11 Is the amount of water available for consumptive use in the resource pool linked to a public planning document? (E.g., a river basin management plan or another planning document – please indicate)</p> <ol style="list-style-type: none"> 1. Yes, the limit is linked to a river basin management plan (Yes, both via the State Water Board and the BayDelta Management plan cited above) 2. Yes, the limit is linked to another planning document, please indicate: 3. No, the limit is not linked to any planning document 	D	If 1 or 2, then 1	1
<p>1.12 If present, is the water management plan a statutory instrument that must be followed, rather than a guiding document?</p>	D	1	1
Total Allocation Score		Max = 18	17
<p>The SFPUC has confirmed that all the aforementioned project requirements are in line with the pre-issuance letter and comply with the adaptation and resilience standards under the CBI criteria. Furthermore, the SFPUC has communicated to Sustainalytics that no amendments have been made to the projects' disclosures.</p>			

Section 2: Governance (To be completed for all water infrastructure assets)			
Criteria	Evidence (E) Disclose (D)	Max Score	Actual Score
<p>2.1 Have water entitlements been defined according to one of the following?</p> <ol style="list-style-type: none"> A. Purpose that water may be used for B. Maximum area that may be irrigated C. Maximum volume that may be taken in a nominated period D. Proportion of any water allocated to a defined resource pool <p>A – D = 1</p>	D	1	1
<p>2.2 Is the surface water system currently considered to be neither over-allocated nor over-used? How might climate change affect this?</p> <p>N.B. Over-allocated would be if e.g. current use is within sustainable limits but there would be a problem if all legally approved entitlements to abstract water were used.</p> <p>Over-used would be if existing abstractions exceed the estimated proportion of the resource that can be taken on a sustainable basis.</p> <p>A = 0.5</p>	E	1	0.5

<p>2.3 If the investment uses groundwater, is the groundwater water system currently considered to be neither over-allocated nor over-used?</p> <p>N.B. Over-allocated would be if e.g. current use is within sustainable limits but there would be a problem if all legally approved entitlements to abstract water were used.</p> <p>Over-used would be if existing abstractions exceed the estimated proportion of the resource that can be taken on a sustainable basis.</p>	E	1	NA
<p>2.4 Is there a limit to the proportion (e.g. percentage) of water that can be extracted?</p> <p>According to the State Water Board, there is a limit to the proportion of the water that can be extracted.</p>	E	1	1
<p>2.5 Are governance arrangements in place for dealing with exceptional circumstances (such as drought, floods, or severe pollution events), especially around coordinated infrastructure operations?</p> <p>Yes, there are explicit plans for all these categories of events, crossing a number of institutional levels. The most relevant for this issuance are described in the Urban Water Management Plans 2010 and 2015 (imminent approval).</p>	D	1	1
<p>2.6 Is there a process for re-evaluating recent decadal trends in seasonal precipitation and flow OR recharge regime, in order to evaluate “normal” baseline conditions?</p> <p>Yes. The Urban Water Management Plan is a periodic review document, based on recent trends in usage and flows.</p>	D	1	1
<p>2.7 Is there a formal process for dealing with new entrants?</p> <p>Yes, defined through the State Water Board process.</p>	D	1	1
<p>2.8 For existing entitlements, is there a formal process for increasing, varying, or adjusted use(s)?</p> <p>Yes, also through the State Water Board.</p>	D	1	1
<p>2.9 Is there policy coherence across sectors (agriculture, energy, environment, urban) that affect water resources allocation, such as a regional, national, or basin-wide Integrated Water Resources Management (IWRM) plan?</p> <p>Yes, through several mechanisms. There are interagency processes at the state level, as well as the aforementioned environmental flows work.</p>	E	1	1
<p>2.10 Are obligations for return flows and discharges specified and enforced?</p> <p>Yes, also monitored. There is a network of state, local and federal agencies involved.</p>	D	1	1

<p>2.11 Is there a mechanism to address impacts from users who are not required to hold a water entitlement but can still take water from the resource pool?</p> <p>Not clearly defined.</p>	D	1	0
<p>2.12 Is there a pre-defined set of priority uses within the resource pool? (E.g., according to or in addition to an allocation regime)</p> <p>Priority usage is clearly defined at the state level.</p>	D	1	1
<p>2.13 If there are new entrants and/if entitlement holders want to increase the volume of water they use in the resource pool and the catchment is open, are these entitlements conditional on either assessment of third party impacts, an Environmental Impact Assessment (EIA) or an existing user(s) forgoing use?</p> <p>Yes = 0, No = 1, Restrictions = 1 (if conditions include one or more of 1-3)</p> <p>C, dependent on 1 – 3 in most cases.</p>	D	1	1
<p>2.14 Are withdrawals monitored, with clear and legally robust sanctions?</p> <p>Yes, primarily through federal systems. Sanctions are clear, legally binding, and subject to civil and criminal actions.</p>	E	1	1
<p>2.15 Are there conflict resolution mechanisms in place?</p> <p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p>	E or D	1	1
Total Governance Score		Max = 14	12.5
<p>The SFPUC has confirmed that all the aforementioned project requirements are in line with the pre-issuance letter and comply with the adaptation and resilience standards under the CBI criteria. Furthermore, the SFPUC has communicated to Sustainalytics that no amendments have been made to the projects' disclosures.</p>			

Section 3: Technical Diagnostics (To be completed for all water infrastructure assets)			
Criteria	Evidence (E) Disclose (D)	Max Score	Actual Score
<p>3.1 Does a water resources model of the proposed investment & ecosystem (or proposed modifications to existing investment & ecosystem) exist?</p> <p><i>Specify model types, such as WEAP, SWAT, RIBASIM, USACE applications). Scale should be at least sub-basin.</i></p> <p>HFAM: http://www.hydrocomp.com/HfamSoftware/Hfam%20II%20Description.htm</p> <p>Sea-level rise is handled separately:</p>	E	1	1

http://onesanfrancisco.org/wpcontent/uploads/Guidance-for-Incorporating-Sea			
3.2 Can the system model the response of the managed water system to varied hydrologic inputs and varied climate conditions? Yes	E	1	1
3.3 Are environmental performance limits (ecosystem, species, ecological community) and/or ecosystem services specified? Yes, in a separate study: http://www.hydrocomp.com/HfamSoftware/Hfam%20II%20Description.htm	E	1	1
3.4 Can these performance limits be defined and quantified using the water resources? Yes, in the above study.	E	1	1
3.5 Have these limits been defined based on expert knowledge and/or scientific analysis? Yes	E	1	1
3.6 Are these performance limits linked to infrastructure operating parameters? Yes	E	1	1
3.7 Are these limits linked to an environmental flow's regime? Yes, both for the Bay and Tuolumne River	E	1	1
3.8 For new projects, is there an ecological baseline evaluation describing the pre-impact state?	E	NA	NA
3.9 For rehabilitation / reoperation projects, is there an ecological baseline evaluation available before the projects was developed? Yes, cited in the scoping documents listed above as well as in environmental flows documents.	E	1	1
3.10 Has there been an analysis that details impacts related to infrastructure construction and operation that has been provided? Do not see this	E	1	0
3.11 Are lost species and/or lost or modified ecosystem functions specified for restoration in the environmental evaluation? Explicitly described in the environmental flows documents.	E	1	1
3.12 Have regional protected areas / nature reserves been included in the analysis for impacts from the investment asset	E	1	1

<p>and future climate impacts?</p> <p>Yes, especially with the Tuolumne River with USFW support.</p>			
<p>3.13 Does the model include analysis of regression relationships between climate parameters and flow conditions using time series of historical climate and streamflow data?</p> <p>Yes</p>	E	1	1
<p>3.14 Does the model include climate information from a multi-modal ensemble of climate projections (e.g., from the Climate Wizard or the World Bank’s Climate Portal) to assess the likelihood of climate risks for the specified investment horizon(s)?</p> <p>Yes</p>	E	1	1
<p>3.15 Are changes in the frequency and severity of rare weather events such as droughts and floods included?</p> <p>Yes</p>	E	1	1
<p>3.16 Are sub-annual changes in precipitation seasonality included?</p> <p>Yes, especially in the Tuolumne River assessment and the SLR study</p>	E	1	1
<p>3.17 Is GCM climate data complemented with an analysis of glacial melt water and sea level rise risks, where appropriate (e.g., high or coastal elevation sites)?</p> <p>Yes.</p>	E	N/A	0
<p>3.18 Is paleo-climatic data (e.g., between 10,000 and >1000 years before present) included?</p> <p>Not yet but planned</p>	E	1	1
<p>3.19 Is the number of model runs and duration of model runs disclosed?</p> <p>Yes</p>	E	1	1
<p>3.20 Has a sensitivity analysis been performed to understand how the asset performance and environmental impacts may evolve under shifting future flow conditions?</p> <p>Yes, in terms of SSIP parameters.</p>	E	1	1
<p>3.21 Is directly measured climate data available for more than 30 years and incorporated into the water resources model?</p> <p>Yes</p>	E	1	1
<p>3.22 Has evidence demonstrated that climate change has already had an impact on operations and environmental targets? Are these impacts specified and, to the extent possible, quantified? These impacts should be responded to</p>	E	1	1

<p>directly in the Adaptation Plan.</p> <p>Yes, both flows and SLR</p>			
<p>3.23 Does the evidence suggest that climate change will have an impact on operations and environmental targets over the operational lifespan? Are these impacts specified and, to the extent possible, quantified? These impacts should be responded to directly in the Adaptation Plan.</p> <p>Yes, both flows and SLR</p>	E	1	1
<p>3.24 Is there a discussion of the uncertainties associated with projected climate impacts on both operations and environmental impacts?</p> <p>Yes</p>	E	1	1
Total Diagnostic Score		Max = 23	22
<p>The SFPUC has confirmed that all the aforementioned project requirements are in line with the pre-issuance letter and comply with the adaptation and resilience standards under the CBI criteria. Furthermore, the SFPUC has communicated to Sustainalytics that no amendments have been made to the projects' disclosures.</p>			

For evaluation of the issuer's adaptation plan Section 6: Adaptation Plan			
Criteria	Evidence (E) Disclose (D)	Max Score	Actual Score
<p>AP 1. Is there a plan to restore or secure lost/modified ecosystem functions / species?</p> <p>Yes, in the Tuolumne River environmental flows management plan</p>	E	1	1
<p>AP 2. Is the adaptation plan for environmental targets / infrastructure robust across specified observed / recent climate conditions? Confer Vulnerability Assessment (VA).</p> <p>Observed impacts have already been significant. The SSIP is designed to be robust to current impacts.</p>	E	1	1
<p>AP 3. Is the adaptation plan for environmental targets / infrastructure robust across specified <i>projected</i> climate conditions? Confer VA.</p> <p>SSIP has extensive plans for changes in both a range of outcomes for SLR and climate variability.</p>	E	1	1
<p>AP 4. Is there a monitoring plan designed to track ongoing progress and impacts to inform future decisions?</p> <p>Yes, especially in the Urban Water Management Plan</p>	E	1	1

AP 5. Is there a plan to reconsider on a periodic basis the VA for operational parameters, governance and allocation shifts, and environmental performance targets?	<p>E</p>	<p>1</p>	<p>1</p>
Total Adaptation Plan Score		Max = 5	5
<p>The SFPUC has confirmed that all the aforementioned project requirements are in line with the pre-issuance letter and comply with the adaptation and resilience standards under the CBI criteria. Furthermore, the SFPUC has communicated to Sustainalytics that no amendments have been made to the projects' disclosures.</p>			

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