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RENEWABLES PORTFOLIO STANDARD 2007 PROCUREMENT VERIFICATION

RPS 2007 Verification Report

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PREFACE

The enactment of Senate Bill 1078 (Sher, Chapter 516, Statutes of 2002) in September 2002 created California's Renewables Portfolio Standard. The standard requires retail sellers of electricity to increase their procurement of eligible renewable energy resources by at least 1 percent per year so that 20 percent of their retail sales are procured from eligible renewable energy resources by 2017. In September 2006, Governor Arnold Schwarzenegger signed Senate Bill 107 (Simitian and Perata, Chapter 464, Statutes of 2006), codifying at the time the most ambitious RPS program for new renewable generation in the nation—the accelerated RPS goal of 20 percent renewables by 2010. On November 17, 2008, Governor Arnold Schwarzenegger raised California's RPS goals to 33 percent by 2020 by signing Executive Order S-14-08. And on April 12, 2011, Governor Jerry Brown signed Senate Bill X1 2 (Simitian, Chapter 1, Statutes of 2011, First Extraordinary Session), legislatively extending the current 20 percent Renewables Portfolio Standard target in 2010 to a 33 percent Renewables Portfolio Standard by December 31, 2020 and broadening the scope of the RPS to include local publicly owned electric utilities.

Under the RPS, the Energy Commission is charged with certifying eligible renewable energy resources that satisfy RPS procurement requirements and developing an accounting system to verify retail sellers' compliance with the RPS. Although not legally mandated, the *Renewables Portfolio Standard Procurement Verification Report* includes the Energy Commission's verification findings for transmittal to the California Public Utilities Commission for use in determining retail sellers' RPS compliance.

ABSTRACT

This *Renewables Portfolio Standard 2007 Procurement Verification Draft Commission Report* presents the California Energy Commission's findings on the amount of renewable energy procured by select retail sellers of electricity under California's Renewables Portfolio Standard (RPS). This report presents RPS procurement verification findings for 14 retail sellers, which includes investor-owned utilities (large and multijurisdictional utilities) and electric service providers. This report also includes an update to Pacific Gas and Electric Company's 2004-2006 RPS procurement amounts, as well as an update to PacifiCorp's 2005-2006 procurement amounts.

The report findings are based on the Energy Commission's Interim Tracking System, which relies on self-reported procurement and generation data that is verified by Energy Commission staff as much as possible. The report lists all of the eligible and ineligible procurement claims made by the various reporting entities. The vast majority of the procurement claims were from RPS-certified facilities with sufficient generation to cover the total procurement amounts claimed.

All retail sellers found to have ineligible procurement claims revised their RPS filings, with the exception of Southern California Edison Company (SCE) regarding procurement claims from the Mountain View wind facilities, the Colmac Energy Mecca (Colmac) biomass facility, and the Geo East Mesa (GEM) facility. The Energy Commission is responsible for preventing double-counting; consequently, in addition to the Mountain View claims not including the renewable energy credits, these procurement claims were not allowed for the RPS to prevent double-counting. Additionally, SCE claimed 100 percent of the generation associated with the Colmac facility for the RPS. In 2007, Colmac exceeded the annual 5 percent fossil fuel de minimis limit, as defined in the *RPS Eligibility Guidebook*; therefore, staff identified the procurement associated with the fossil fuel usage as ineligible for the RPS. The majority of the Colmac generation, the portion associated with the use of a renewable resource, is RPS-eligible. Also, in April 2011 staff became aware that SCE had combined 2007 procurement from the GEM facility, which was not RPS certified, with the procurement claim of another RPS-certified facility. SCE has since taken steps to certify the GEM facility; however, in accordance with the *RPS Eligibility Guidebook,* the procurement is not eligible retroactively for 2007.

Without evidence to the contrary, Energy Commission staff finds the procurement claim amounts listed in this report eligible for the RPS to count toward meeting the retail sellers' RPS obligations.

Keywords: Renewables Portfolio Standard, RPS, Renewable Energy Credits, RECs, renewable attributes, annual procurement target, initial baseline procurement amount, incremental procurement target, certification, verification, generation, investor-owned utilities, electric service providers, multijurisdictional utilities, community choice aggregators, Western Renewable Energy Generation Information System, WREGIS

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EXECUTIVE SUMMARY

Background

In September 2002, Senate Bill 1078 (Sher, Chapter 516, Statutes of 2002) was enacted, creating California's Renewables Portfolio Standard (RPS). This initial RPS required retail sellers of electricity to increase their procurement of eligible renewable energy resources by at least 1 percent per year, so that 20 percent retail sales are procured from eligible renewable energy resources by 2017. Governor Arnold Schwarzenegger signed Senate Bill 107 (Simitian and Perata, Chapter 464, Statutes of 2006) in September 2006, thereby, accelerating the RPS goal to 20 percent renewables by 2010. Governor Schwarzenegger again raised California's RPS goals to 33 percent by 2020 by signing Executive Order S-14-08 on November 17, 2008. And on April 12, 2011, Governor Jerry Brown signed Senate Bill X1 2 (Simitian, Chapter 1, Statutes of 2011, First Extraordinary Session) codifying the current 20 percent renewables portfolio standard target in 2010 to a 33 percent renewables portfolio standard by December 31, 2020. This legislation also broadens the scope of the RPS to include local publicly owned electric utilities.

Under the RPS, the California Energy Commission is charged with certifying eligible renewable energy resources that satisfy RPS procurement requirements and developing an accounting system to verify retail sellers' compliance with the RPS.

The Energy Commission and the California Public Utilities Commission (CPUC) jointly implement the RPS program. The CPUC is primarily responsible for establishing RPS baseline formulas, implementing annual procurement targets, determining compliance, and imposing penalties for non-compliance. The CPUC applies "flexible compliance" rules that allow retail sellers to use excess RPS procurement from earlier years and earmark RPS procurement for future years to address current year RPS shortfalls. Energy Commission staff is not evaluating retail sellers' progress in meeting annual procurement targets in this report, but rather is providing the RPS procurement verification results for the CPUC to use when determining compliance. For retail sellers whose baseline calculation was not included in the *2006 Verification Report*, staff is providing their baseline amounts based on RPS-eligible procurement claims.

The *Renewables Portfolio Standard 2007 Procurement Verification Draft Commission Report (2007 Verification Report)* compares retail sellers' RPS procurement claims with facility-level generation data submitted to various energy programs to verify that there was sufficient generation to substantiate total procurement claims. This report applies to retail sellers, which includes investor-owned utilities (large, small, and multijurisdictional), electric service providers (ESPs), and community choice aggregators reporting for 2007. There are no small utilities or community choice aggregators reporting, but two multijurisdictional utilities are included. While local publicly owned electric utilities (POUs) must implement an RPS program and

report their progress to the Energy Commission, POUs are not regulated by the CPUC and, therefore, are not included in this report.

During the verification process, eight retail sellers resubmitted 16 revised RPS-Track forms to correct previous procurement claims. As appropriate, staff accepted these revised RPS procurement claims. During the verification process, staff also identified a small number of claims from previous years that needed correction. As a result, corrections to the previous years' total eligible amounts for PacifiCorp and Pacific Gas and Electric Company (PG&E) have been adjusted. The claims are listed in the report to illustrate the procurement changes for the appropriate years and the revised total annual RPS eligible procurement claim amounts. However, the claims are not outstanding issues, as the corrected RPS-Track forms were submitted from both retail sellers.

On January 31, 2011, Energy Commission staff held an RPS Procurement Verification Data Review Workshop to present publicly the initial results of the verification process for this report. Among other agenda items, the workshop addressed Southern California Edison Company's (SCE) procurement claims associated with the Mountain View wind facilities (Mountain View). SCE's Mountain View procurement claims are for energy only and do not include the environmental attributes or renewable energy credits. Additionally, staff discussed how a portion of SCE's procurement claim associated with the Colmac Energy Mecca (Colmac) biomass facility exceeded its 2007 annual fossil fuel limit to still count 100 percent of its generation as eligible for the RPS. Energy Commission staff determined that only the amount of generation attributable to the use of a renewable resource (in this case, biomass) is considered RPS-eligible for this facility.

Before the workshop, a public notice was published with background information on the ineligible claims. Two entities provided public comments before the workshop supporting the decision not to count SCE's Mountain View claims. Two representatives spoke at the staff workshop. An SCE representative spoke in favor of SCE's claims. A renewable energy consultant expressed concern about the Colmac fossil fuel issue, but upon learning that SCE would still be able to claim the majority of the generation, all of that associated with the renewable portion of the generation, indicated that the Energy Commission staff's position seemed reasonable. Staff considered these public comments when preparing this draft *Commission* report.

Another ineligible claim was identified during the review process of the staff draft report. In 2007, SCE procured and claimed as RPS eligible, renewable energy from the Geo East Mesa (GEM) facility, by combining GEM procurement data with procurement data and using the RPS identification number for Ormesa 1, an RPS-certified facility. Procurement from the Ormesa 1 facility was initially identified as an overclaim, but SCE provided meter data supporting of the claim, stating that meter data was more accurate than invoice data. However, SCE did not mention to staff that the meter data included generation from three separate facilities. In April 2011, SCE submitted a revised CEC-RPS-Track form breaking out the GEM procurement from the Ormesa 1 procurement claim and staff used this breakout to determine the amount of procurement that is attributable to the GEM facility and therefore ineligible.

In April 2011, SCE submitted an application for certification for the GEM facility and a letter requesting that the Energy Commission consider making the certification date of the GEM facility retroactive to April 23, 2007. According to Footnote 68 on page 42 of the Fourth Edition of the *RPS Eligibility Guidebook*: "The Third Edition of the RPS Eligibility Guidebook only allows generation to count toward a retail seller's RPS procurement obligation if it occurs after the Energy Commission receives the pre-certification or certification application. Earlier RPS Eligibility Guidebook editions did not contain this restriction and counted all generation toward a retail seller's RPS obligation so long as the facility eventually became certified. This Fourth Edition provides notice that going forward, the Energy Commission will no longer count pre-2008 procurement toward a retail seller's RPS obligation unless the facility was certified at the time of the procurement or the Energy Commission receives an application for certification before March 1, 2011. "In accordance with the *RPS Eligibility Guidebook*, the Energy Commission's Renewables Committee agreed with staff's recommendation to grant the GEM facility RPS-eligibility beginning in April 2011, which is when SCE submitted the application for certification. Therefore, SCE's 2007 procurement from the GEM facility is ineligible because the facility was not RPS-certified in 2007.

Purpose

While not legally mandated, verification reports are prepared as part of the Energy Commission's RPS responsibilities. Upon finalization of the *2007 Verification Report,* the Energy Commission transmits its RPS procurement verification findings to the CPUC. This report:

- Verifies the RPS eligibility of the renewable energy facilities from which each reporting retail seller is claiming procurement.
- Verifies, as much as possible, that the amount of energy procurement claimed by each retail seller was sufficiently generated by each RPS-eligible facility.
- Verifies, to the extent possible, that RPS procurement exclusively serves California's RPS and does not support another renewable energy regulatory or market claim.
- Indicates the eligible and ineligible RPS procurement claims per retail seller and provides the total amount of eligible RPS procurement.
- Verifies that out-of-state renewable facilities satisfy the Energy Commission's RPS delivery requirements.
- Provides analysis of RPS eligible claims, including availability of generation data for verification, RPS-eligible procurement by resource type, and procurement from new and repowered generation.
- Discusses the limitations of the Interim Tracking System.

Conclusions

The findings in this *2007 Verification Report* are based on the Energy Commission's Interim Tracking System, which has limitations that should be noted. The robustness of the current approach is limited by the availability and quality of generation data that the RPS-procurement claims are checked against, the ability of staff to account for renewable energy procurement claims on the voluntary market and other renewable energy reporting programs, such as those in other states. Once the Energy Commission adopts a verification report, it transmits the report to the CPUC, so the CPUC may determine compliance with RPS requirements. The Energy Commission may make corrections to previous verification results if staff later learns of errors.

This report lists all of the eligible and ineligible procurement claims made by the various reporting entities. The vast majority of the procurement claims were from RPS-certified facilities with sufficient generation to cover the total procurement amount claimed. Initially, however, staff identified some 2007 RPS procurement claims as ineligible. Staff worked with retail sellers and was able to correct most of these ineligible claims.

The Energy Commission is responsible for preventing double-counting; consequently, in addition to the Mountain View wind facilities claims not including the RECs, these claims were not allowed to be counted for RPS purposes to prevent double-counting. However, for reasons described in detail in the Energy Commission's *2006 RPS Verification Report*, the CPUC should consider the unique circumstances surrounding SCE's procurement claims associated with Mountain View in determining SCE's RPS compliance.

During the verification process, staff also identified corrections to the total amounts listed as eligible toward the RPS in previous years' RPS procurement for PacifiCorp and PG&E.

Without evidence to the contrary, the Energy Commission finds that the procurement claim amounts listed in this report eligible for the RPS to count toward meeting the retail sellers' RPS obligations.

SECTION 1: Introduction

RPS Verification Report Development Process

This *Renewables Portfolio Standard 2007 Procurement Verification Commission Draft Report (2007 Verification Report)* presents the California Energy Commission's findings on the amount of renewable energy procured by select retail electricity sellers under California's Renewables Portfolio Standard (RPS).

The RPS was established by Senate Bill 1078 (Sher, Chapter 516, Statutes of 2002), which required the state's retail sellers of electricity — electric corporations[1], electric service providers (ESPs), and community choice aggregators (CCAs) — to procure 20 percent of their retail electricity sales with eligible sources of renewable energy by 2017. California's energy agencies subsequently committed to achieving the 20 percent target by 2010.[2] This accelerated 20 percent target was codified by the enactment of Senate Bill 107 (Simitian and Perata, Chapter 464, Statutes of 2006), which took effect on January 1, 2007. The RPS statutes underscore the importance of increasing the diversity, reliability, public health, and environmental benefits of the energy mix. On November 17, 2008, Governor Arnold Schwarzenegger signed Executive Order S-14-08, setting a 33 percent renewables goal by 2020.[3,4] And on April 12, 2011, Governor Jerry Brown signed Senate Bill X1 2 (Simitian, Chapter 1, Statutes of 2011, First Extraordinary Session) legislatively extending the current 20 percent renewables portfolio standard target in 2010 to a 33 percent Renewables Portfolio Standard by December 31, 2020 and broadening the scope of the RPS to include local publicly owned electric utilities.[5] The Energy Commission supports this mandate, which will also help the state meet the greenhouse gas reduction target of reaching 1990 emissions levels by 2020.[6]

SB 1078 requires the Energy Commission to certify renewable generating facilities as eligible for California's RPS and to develop an accounting system to verify retail sellers' compliance with the RPS. The Energy Commission's *Renewables Portfolio Standard Eligibility Guidebook (RPS Guidebook)* specifies the eligibility criteria and process for certifying generating facilities as

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1 Also referred to as "investor owned utilities."

2 California Energy Commission, *2008 Energy Action Plan Update*, CEC-100-2008-001 http://www.energy.ca.gov/energy_action_plan/index.html. http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm.

3 Office of the Governor, Executive Order S-14-08, November 17, 2008.

4 On September 15, 2009, Governor Schwarzenegger signed Executive Order S-21-09 directing the California Air Resources Board to enact regulations that will achieve the goal of having 33 percent of electricity used in California to come from renewable sources by 2020.

5 http://www.leginfo.ca.gov/pub/11-12/bill/sen/sb_0001-0050/sbx1_2_bill_20110412_chaptered.pdf

6 California Energy Commission, 2008 *Integrated Energy Policy Report* Update, CEC-100-2008-008-CMF.

eligible for the RPS.[7] The eligibility criteria include facility qualifications by technology, size, fuel type, initial commercial operation date, and delivery requirements for out-of-state facilities. The responsibility previously held by the Energy Commission to award supplemental energy payments (SEPs) to cover the above-market costs to procure new and repowered eligible renewable energy resources was eliminated by the Legislature in October 2007.[8]

The initial RPS law also required the Energy Commission to certify the specific portion of a geothermal facility's capacity that qualifies as incremental geothermal production and is thereby eligible for satisfying a retail seller's RPS procurement obligations.[9] SB 107 amended this law and eliminated the Energy Commission's responsibility to certify and measure incremental geothermal production. In the *2006 Verification Report,* staff noted that future verification reports would not quantify incremental geothermal procurement. The change in statute went into effect January 1, 2007. Therefore, unlike previous verification reports but consistent with legislation, this report does not include a section on incremental geothermal production.

The Energy Commission and the California Public Utilities Commission (CPUC) jointly implement the RPS program. The primary responsibilities of the CPUC are to establish RPS baseline formulas, implement annual procurement targets (APTs), determine compliance, and impose penalties for noncompliance. Since the CPUC is responsible for determining compliance, which encompasses the use of "flexible compliance" to address RPS shortfalls, Energy Commission staff is not evaluating retail sellers' progress in meeting RPS obligations in this report. In Appendix A, based on verified RPS procurement claims, Energy Commission staff provides the baselines of three retail sellers who are represented for the first time in this verification report for CPUC staff to use in determining compliance.[10]

While not legally mandated, the verification report is prepared as part of the Energy Commission's RPS responsibilities. Upon finalization of the *2007 Verification Report*, the Energy

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7 California Energy Commission, *Renewables Portfolio Standard Eligibility Guidebook*, Second Edition. March 2007. http://www.energy.ca.gov/2007publications/CEC-300-2007-006/CEC-300-2007-006-CMF.PDF.

8 Senate Bill 1036(Perata, Chapter 685, Statutes of 2007) repealed the provisions in Public Resources Code Section 25743 that charged the Energy Commission with awarding SEPs and required the Energy Commission to return the remaining unencumbered funds available for SEPs to the electrical corporations for administration. Under SB 1036, the Energy Commission transferred these funds to the electrical corporations in March 2008. The CPUC implemented SB 1036 through Resolution E-4199 and Resolution E-4160.

9 Before the enactment of SB 107, Public Utilities Code Section 399.12(a)(2) provided that the "Energy Commission shall determine historical production trends and establish criteria for measuring incremental geothermal production that recognizes the declining output of the steamfields and contribution of capital improvements in the facility or wellhead." SB 107 eliminated this requirement, and the Energy Commission revised its *RPS Guidebook* to reflect this change in the law.

10 Other retail sellers' baseline amounts were included in Appendix B of the *2006 Verification Report.*

Commission will transmit its RPS procurement verification findings to the CPUC. To date, the Energy Commission has published verification reports for compliance years 2004-2006.

The *2007 Verification Report* includes procurement from the following 14 entities: Pacific Gas and Electric Company (PG&E); San Diego Gas & Electric Company (SDG&E); Southern California Edison Company (SCE); 3Phases Energy Services; APS Energy Services; Calpine Power America-CA; Commerce Energy, Inc.; Constellation NewEnergy, Inc.; Coral Power, LLC; Pilot Power Group, Inc; Sempra Energy Solutions; Strategic Energy, LLC; Pacific Power / PacifiCorp, and Sierra Pacific Power Company. A total of 23,098GWh of renewable procurement from 550 renewable facilities was verified as RPS-eligible for the 2007 compliance year.

Staff has identified some claims as ineligible. The first claim is ineligible because it is an energy only procurement claim, made by SCE for the Mountain View wind facilities (Mountain View), for which the RECs were sold and claimed on the voluntary market. The Energy Commission is responsible for preventing double-counting; consequently, in addition to these claims not including the RECs, these claims were not allowed to be counted for RPS purposes to prevent double-counting for years 2003-2007. For reasons described in detail in the *2006 RPS Verification Report,* the CPUC should consider the unique circumstances surrounding SCE's procurement claims associated with Mountain View in making determinations on SCE's RPS compliance.

The second ineligible claim is from the Colmac Energy Mecca Biomass Facility (Colmac), claimed by SCE. Colmac exceeded the 5 percent de minimis fossil fuel usage limit; therefore, only the amount associated with the renewable portion of generation is RPS-eligible. The listing of ineligible claims is consistent with the eligibility requirements in the Energy Commission's *RPS Guidebook.*[11] These issues are discussed in detail in Section 3 : Procurement Verification Results.

The third ineligible claim is from the Geo East Mesa (GEM) facility, claimed by SCE. In April 2011 staff became aware that SCE had combined 2007 procurement from the GEM facility, which was not RPS certified, with the procurement claim of another RPS-certified facility. SCE has since taken steps to certify the GEM facility. However, in accordance with the *RPS Eligibility Guidebook,* the procurement is not eligible for 2007.

On January 31, 2011, Energy Commission staff held a public workshop to review its preliminary 2007 RPS procurement verification data findings.[12] Section 3: Procurement Verification Findings provides a summary of the workshop comments. On April 14, 2011, the *Draft Staff 2007 Verification Report* was posted for public comment. Following the April 2011, public review period of the report, PacifiCorp and SCE submitted comments regarding their 2007 RPS procurement claims. Also, SCE submitted its revised 2007 RPS procurement claims, as a result of its discussions with Energy Commission staff. As appropriate, staff incorporated these

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11 California Energy Commission, *Renewables Portfolio Standard Eligibility Guidebook*, Second Edition. March 2007. http://www.energy.ca.gov/2007publications/CEC-300-2007-006/CEC-300-2007-006-CMF.PDF

12 The workshop notice can be found at http://www.energy.ca.gov/portfolio/notices/2011-01-31_Notice_2007_RPS_Verification_Data_Workshop.pdf.

stakeholder comments and revised RPS procurement claims, including an update to findings on SCE's procurement. These changes are reflected in this *Draft Commission 2007 Verification Report.*

Energy Commission staff has finalized this draft commission report and will present it at a regularly scheduled business meeting for Energy Commission adoption. Upon adoption of the *2007 Verification Report*, staff will transmit the report to the CPUC for use in determining retail sellers' RPS compliance.

Report Organization and Scope

This report is organized into five sections. Section 1 is the introduction, followed by Section 2, which describes the Interim Tracking System method. Section 3 provides the procurement verification findings for the retail sellers. Section 4 presents aggregated, or combined, RPS procurement data pertaining to resource type by year and RPS procurement of new and repowered generation. Section 5 discusses the limitations of the current Interim Tracking System.

This report compares RPS procurement claims made by retail sellers with generation data submitted to various energy programs by generating facilities to verify that there was sufficient generation to cover the total amount of procurement from each facility. The *2007 Verification Report* applies to retail sellers, which include large investor-owned utilities (IOUs), small and multijurisdictional utilities (SMJUs), and electric service providers (ESPs).[13] While there are no small utilities reporting, two multijurisdictional utilities (PacifiCorp and Sierra Pacific Power) are included. Nine ESPs have made RPS procurement claims.

There are no POUs covered in the *2007 Verification Report* because they are not regulated by the CPUC. However, they are directed by SB 1078 and SB 107 to design programs with similar goals as the regulated utilities that "recognize the intent of the Legislature to encourage renewables…"[14] and to report annually to the Energy Commission on their progress. This information is provided on the Energy Commission's website at: http://www.energy.ca.gov/2005publications/CEC-300-2005-023/CEC-300-2005-023.PDF.

Summary tables show the eligible and ineligible claims listed separately. The format is designed to allow the CPUC to understand easily the reasons that certain claims may have been deemed ineligible by the Energy Commission for RPS compliance purposes. The procurement claims listed as ineligible and the reasons for this determination are described in Section 3: Procurement Verification Findings. Additionally, Section 3: Procurement Verification Findings shows the corrections made to previous years.

13 There were no CCAs operational in 2007; therefore, there are no CCAs included in this report.

14 Public Utilities Code Section 387(a).

Renewables Portfolio Standard Procurement Targets

The RPS requires California's IOUs, ESPs, SMJUs, and CCAs to increase procurement from eligible renewable energy resources by at least 1 percent of their retail sales each year, until they reach 20 percent by 2010.[15] The RPS statute establishes three components for RPS procurement: the initial baseline procurement amount (IBPA), the incremental procurement target (IPT), and the annual procurement target (APT).[16] This report determines the baseline amounts for three retail sellers in Attachment A, which also provides a detailed discussion on the baseline formulas used to calculate these baselines. The *2006 Verification Report* provided a detailed discussion on baseline formulas for IOUs, ESPs, and MJUs. Because the IOU baselines were established in the *2006 Verification Report* and there are no new IOUs reporting or updates to the IOUs' baselines, this report does not address the IOU baselines. The report focuses only on the baselines of the ESPs and MJUs because there are two ESPs and one MJU included in this report that were not in the *2006 Verification Report.*[17]

15 Subject to CPUC rules for flexible compliance (Decision 06-10-050, R.06-05-027, Opinion on Reporting and Compliance Methodology for Renewables Portfolio Standard Program). The 20 percent by 2010 target is also clarified in the above-referenced CPUC decision.

16 The CPUC is responsible for setting annual procurement targets. See CPUC Decision D.06-10-050 for more information.

17 This report does not account for banked procurement because banking falls under the CPUC's purview as part of evaluating compliance with the RPS targets. Under the current CPUC rules, surplus procurement in the year before a retail seller's first APT is eligible for banking and can be applied to its future deficits. To see the compliance reports filed by the retail sellers, go to: http://www.cpuc.ca.gov/PUC/energy/Renewables/compliance.htm

SECTION 2: Method

The Interim Tracking System method used for this report is termed "interim" because the Energy Commission has been developing a more robust electronic system to verify RPS procurement claims. The Energy Commission finds it reasonable for retail sellers to use the electronic system, known as the Western Renewable Energy Generation Information System (WREGIS), for RPS reporting partially in 2008 and fully thereafter.[18]

WREGIS is now operational, and it will replace the Interim Tracking System and serve as the accounting and verification system for the California RPS. The Energy Commission will produce its verification report using data from the WREGIS system starting with the 2008 report (as described above). The Energy Commission plans to use data from North American Electricity Reliability Council (NERC) e-Tags[19] to verify delivery of energy from out-of-state facilities into California.

Interim Tracking System

To track and verify the retail sellers' RPS procurement claims, Energy Commission staff applied the approach used since 1998 for the Power Source Disclosure Program.[20]

The first step in the procurement verification analysis was to check that the procurement claimed was generated by a certified RPS-eligible facility. Next, a comparison was made between the amount of RPS-eligible energy procured by retail sellers from a specified facility and the total amount of energy generated by that facility to ensure that the amount claimed did not exceed the amount generated. For example, if two or more retail sellers claimed procurement from the same facility, the cumulative amount of energy procured from that facility was compared with the total amount of energy generated by that facility.

If staff found that a procurement claim exceeded generation by more than 5 percent, staff requested information from the retail seller to support the procurement claim. For example, if

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18 This use of WREGIS in reporting for compliance years 2008 and beyond is described in the *RPS Eligibility Guidebook, Fourth Edition, January 2011.* http://www.energy.ca.gov/2010publications/CEC-300-2010-007/CEC-300-2010-007-CMF.PDF.

19 A NERC e-Tag is an electronic record that contains the details of a transaction to transfer energy from a seller to a buyer where the energy is scheduled for transmission across one or more balancing authority area boundaries.

20 The Power Source Disclosure Program is implemented under Public Utilities Code Section 398.1, et seq., as enacted by Senate Bill 1305 (Chapter 796, Statutes of 1997), and the Energy Commission's regulations as set forth in Title 20 of the California Code of regulations, Sections 1390-1394. This law requires retail suppliers of electricity to disclose to consumers "accurate, reliable and simple to understand information on the sources of energy that are (being) used...." (Public Utilities Code Section 398.1(B)).

data showed that a facility generated 100 megawatt-hours (MWh) and the utility reported it procured 108 MWh, staff requested supporting documentation to confirm the procurement claim. The method allows for a 5 percent difference between generation and procurement figures to account for possible reporting differences. These differences may occur for various reasons, such as rounding errors that may arise when comparing data sources that use differing energy units, for example, gigawatt-hours (GWh) versus kilowatt-hours (kWh).

Next, staff determined, as much as possible, that RPS-eligible energy procured by the retail sellers was counted only once in California or any other state. More information on this topic is provided throughout this report.

Finally, staff verified that procurement from out-of-state facilities satisfied RPS delivery requirements, using the process described in Section 3: Procurement Verification Findings.

Sources of Procurement Data

All retail sellers addressed in this report filed CEC-RPS-Track forms with the Energy Commission to report their annual RPS procurement. In their CEC-RPS-Track filings, the retail sellers reported how much energy they procured in the various calendar years, delineated by RPS-certified facility and by month, as well as their total annual retail sales.[21] Additionally, staff used supporting documentation, such as utility invoices, as a data source if procurement claimed by the retail seller exceeded generation data by more than 5 percent. For this *2007 Verification Report*, a procurement "claim" or "specific purchase" refers to the amount of energy a retail seller procured from a specific renewable facility. Appendix B: Individual Retail Sellers' Modified RPS Track Forms includes a summary of the information presented.

Sources of Generation Data

To verify the retail sellers' procurement data, Energy Commission staff collected generation data from various sources, including the U.S. Energy Information Administration's (EIA) website. The EIA website provides annual generation information from facilities with a capacity greater than 1 megawatt (MW).[22] Staff also used self-reported data submitted from owners of electric power plants larger than 1 MW located in California, as reported to the Energy Commission's Electricity Analysis Office.

The data collected include the power plant's nameplate capacity, fuel type, generation, and fuel usage. Owners of generating facilities with a nameplate capacity of 1 to 10 MW must report

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21 The CEC-RPS-Track forms were submitted to the Energy Commission by authorized representatives of the retail sellers who could attest to the specific purchases and other procurement claim information presented in the CEC-RPS-Track forms.

22 Annual generation data from the Energy Information Administration can be downloaded from [www.eia.doe.gov/cneaf/electricity/page/eia906_920.html].

annually, while owners of facilities larger than 10 MW must report quarterly. Additionally, staff reviewed data collected from generating facilities that are registered and eligible for funding from the Energy Commission's Existing or New Renewable Facilities Programs.

In most cases, facility generation data were compiled from more than one source. If the various data sources showed different generation amounts per facility, procurement was compared to the data source showing the most generation from that facility, since lower generation figures may capture only specific periods of generation from that facility, rather than the entire year.

Additional generation data came from the RPS-certified facilities. These facilities must submit data annually on monthly generation, including any generation sold to an entity that does not qualify as a retail seller under Public Utilities Code Section 399.12, Subdivision (c), such as publicly owned utilities. These data must be reported on the CEC-RPS-GEN form by June 1 (or the next business day) of each year, unless the facility is owned by a retail seller or a retail seller certified the facility as RPS-eligible on the facility's behalf.

Staff accepted the CEC-RPS-Track form claim as the generation claim for utility-certified facilities with no otherwise reported generation. As stated on page 47 in the *RPS Eligibility Guidebook, Third Edition*, the retail seller is responsible for reporting the generation data for the facilities it certifies. Therefore, if the facility is utility-certified, the procurement amount reported is accepted as reported on the CEC-RPS-Track form, and additional generation data is not required.

As noted above, for facilities in which available generation data indicated that the procurement exceeded generation by 5 percent or greater, staff requested that the procuring utility submit supporting documentation to verify procurement from those facilities.

RPS Certification

In general, a facility is RPS-eligible if, as defined in the *RPS Eligibility Guidebook*, it uses an eligible renewable resource or fuel, satisfies resource-specific criteria, and is either located within the state or satisfies applicable requirements for out-of-state and out-of-country facilities. The Energy Commission will not count a facility's generation for the RPS unless the facility is certified as RPS-eligible. The first step in Energy Commission staff's verification process is to determine that all facilities claimed are RPS-certified.

Verification That RPS Procurement Is Counted Only Once

The Energy Commission also verified, as much as possible, that RPS procurement was counted only once in California or any other state. The primary data source for this purpose was the data supporting the Power Source Disclosure Program. If a retail seller claims specific purchases — purchases traceable to specific generation sources — on its Power Content Label, the seller is then required to submit an annual report to the Energy Commission listing generating facilities from which it procured specific purchases for the previous year.[23] Using data reported to the Power Source Disclosure Program, retail seller procurement was cross-referenced with retail sales made by other load-serving entities in California, including POUs.[24]

Initial analyses of the 2007 Power Source Disclosure Program data included annual reports from 35 retail providers and 2 electricity wholesalers. Data from the annual reports included procurement from 731 facilities, including 396 that were certified as RPS-eligible or were "registered" with the Energy Commission as a renewable supplier.[25]

Coordinating With Other States to Ensure Against Double-Counting of RECs

As mentioned above, this *2007 Verification Report* includes information from MJUs. The MJUs in this report include PacifiCorp and Sierra Pacific Power. Energy Commission staff verified, as

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23 The Power Content Label is the format provided by the Energy Commission for the Power Source Disclosure Program to allow retail electric providers to disclose their fuel source information about electricity product(s) offered for sale to their customers. As specified in Title 20 of the California Code of Regulations, Sections 1390-1394, specific purchases for the Power Source Disclosure Program refer to wholesale power purchases that the retailer can trace to specific generators and thereby claim that the electricity offered for sale to retail customers is of a particular fuel or resource type.

24 The following entities submitted 2007 Annual Reports to the Power Source Disclosure Program: 3Phases Energy Services, Alameda Power & Telecom, Anaheim Public Utilities, APS Energy Services, Azusa Light & Water, Bear Valley Electric Service, Biggs Municipal Utilities, Burbank Water and Power, City of Colton, Coral Power, Eastside Power Authority, City of Healdsburg, Imperial Irrigation District, Island Energy, Lodi Electric Utility, Los Angeles Department of Water & Power, Merced Irrigation District, Modesto Irrigation District, City of Needles, Northern California Power Authority, Pacific Gas and Electric Company, City of Palo Alto, Pasadena Water and Power, Plumas - Sierra Rural Electric Cooperative, Power & Water Resources Pooling Authority, Redding Electric Utility, Riverside Public Utility, Roseville Electric, Sacramento Municipal Utility District, San Diego Gas & Electric Company, Sempra Energy Solutions, City of Shasta Lake, Silicon Valley Power, Southern California Edison Company, Turlock Irrigation District, City of Ukiah, Valley Electric Association.

25 Through 2006, facilities that did not meet the RPS or SEP eligibility requirements could apply to the Energy Commission for "registration" as a renewable supplier if the facilities generated then applicable electricity from one or more of the renewable resources consistent with definitions in the Energy Commission's *Overall Program Guidebook* (December 2006, Pub, No. CEC-300-2006-008-ED2). Facilities were also required to report the type and percentage of fossil fuel used, if applicable. Effective March 2007, the Energy Commission no longer registers facilities as renewable suppliers.

much as possible, that the renewable generation claimed by PacifiCorp and Sierra Pacific Power for RPS compliance was not also claimed by the retail providers in other states.

In years past with funding provided by a U.S. Department of Energy grant, Energy Commission staff collaborated with staff from Oregon and Washington state energy agencies to develop an energy information/tracking system. This tracking system was developed to support the administration of the Power Source Disclosure Program by enabling the participating states to determine if generation was claimed in more than one of the participating states. While Energy Commission staff was able to obtain data for 2007 using this tracking system, currently, the state of Washington is unable to continue operation of the system. In future years, Energy Commission staff will primarily be using WREGIS to track generation and procurement and will not rely on the energy tracking system described above.

Staff also collaborated with the Public Utilities Commission of Nevada to confirm that procurement from the 18 facilities located in Nevada and being claimed for California RPS purposes did not exceed generation when Nevada procurement amounts were combined with California procurement amounts from these facilities. Section 3: RPS Procurement Verification Findings discusses details of this coordination.

Coordinating With the Voluntary Renewable Energy Credit Market to Ensure Against Double-Counting of RECs

In addition to ensuring against double-counting generation from facilities selling generation to other states for their regulatory renewable energy programs, Energy Commission staff coordinated with Green-e Energy[26] to verify that California RPS procurement claims were not also being counted on the voluntary REC market. For example, in the *2006 Verification Report*, staff addressed at length double-counting of RECs associated with generation from the Mountain View facilities. As discussed in that report, RPS claims from the Mountain View facilities are technically energy-only products and do not include the environmental attributes, which are required of all RPS procurement claims. These important issues were discussed in detail at the 2006 RPS Procurement Verification Data Review Workshop held on March 26, 2009, and many stakeholders provided written comments.[27] Because SCE also claimed procurement from Mountain View in 2007, this topic was also discussed at the January 31, 2011, staff workshop to review 2007 RPS procurement data, but to a much lesser extent than for the 2006 data review workshop and 2006 *Verification Report*.

Staff also worked with Green-e to determine if there were any other RPS and/or voluntary REC market claims of concern for 2007 RPS procurement data. The initial concerns of possible double counting that were identified through the 2007 verification process were resolved with input

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26 Green-e Energy, a program of the Center for Resource Solutions, is an independent consumer protection program for the sale of renewable energy in the voluntary retail market. www.green-e.org/.

27 http://www.energy.ca.gov/renewables/02-REN-1038/documents/2009-03-26_workshop/comments/.

from retail sellers and retail sellers revised their RPS-Track forms, so that no procurement claims were determined to represent double-counting.

Long-Term Verification

To better meet its statutory requirements for RPS verification, the Energy Commission, together with the Western Governors' Association, has developed WREGIS. As noted, WREGIS will electronically track renewable energy credits (WREGIS Certificates) representing renewable energy generation, and it will replace the Interim Tracking System that was used as the basis for this report.

For each MWh of energy generated and reported, WREGIS creates a unique electronic certificate. Certificates are tagged as "California RPS-Eligible," as applicable. WREGIS functions much like a banking system, with WREGIS Certificates initially being deposited into a generator's "active sub-account." WREGIS Certificates can be transferred between accounts but can reside in only one account at a time, thereby protecting against double-counting of renewable energy generation so long as the Certificate continues to be tracked in WREGIS. Banking for RPS flexible compliance purposes is done by the CPUC as part of its "flexible compliance" rules, and all WREGIS Certificates must first be retired in WREGIS and reported to the Energy Commission before they can be "banked" under the CPUC's flexible compliance rules.

Renewable generators, load-serving entities, and third parties from the Western United States, Western Canada, and parts of Northern Mexico may participate in WREGIS. As a regional system, WREGIS is designed to verify that reported generation is counted only once in California and throughout the geographic area covered by the Western Electricity Coordinating Council (WECC).[28]

WREGIS began operation in June 2007. According to the Energy Commission's *RPS Eligibility Guidebook, Third Edition*, WREGIS data would replace the Interim Tracking System for verification of RPS-eligible energy generated on or after May 1, 2008. To enable the use of WREGIS, generating facilities, retail sellers, procurement entities, and third parties participating in California's RPS were required to register as account holders with WREGIS by January 1, 2008, with the exception of the three large IOUs (PG&E, SDG&E, and SCE), which had until May 1, 2008, to sign up and begin to use WREGIS.

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28 The WECC is one of four regional organizations that oversee the operation of the nation's bulk power grid and among the 10 regional councils of the HNorth American Electric Reliability Council (NERC). It provides coordination in operating and planning the electricity system for the Western Interconnection. HThe Western Interconnection is the geographic area containing the synchronously operated electric transmission grid in the western part of North America, which includes parts of Montana, Nebraska, New Mexico, South Dakota, Texas, Wyoming, and Mexico and all of Arizona, California, Colorado, Idaho, Nevada, Oregon, Utah, Washington, and the Canadian-provinces of British Columbia and Alberta.

However, in a joint Energy Commission – CPUC report on the operational readiness of WREGIS, *Joint Commission Tracking System Operational Report,* the two commissions noted "that it is reasonable for the Energy Commission to continue to use the Interim Tracking System through 2008 to verify generation for which there is no WREGIS data. The Commissions agreed that the Interim Tracking System will continue to be used in this manner for 2008 generation only."[29] Staff revised the *RPS Guidebook* to incorporate this approach for 2008 and future RPS compliance years.[30]

Generation is reported by a Qualified Reporting Entity to WREGIS, and retail sellers provide reports generated via WREGIS to the Energy Commission to meet the reporting requirements currently satisfied with the Interim Tracking System CEC-RPS-Track forms. The WREGIS reports will replace the need for cross-references with other databases to ensure that the RPS-eligible energy is counted only once. WREGIS includes functionality to facilitate matching NERC e-Tag data with retired RECs to verify every delivery into California from eligible out-of-state renewable generators.

Outlook for Future Reports

In its fourth edition of the *RPS Guidebook,* the Energy Commission set February 1, 2011, as the submission date for entities to report 2008 RPS-eligible procurement and generation data. The reporting update specifies that the Interim Tracking System is planned to be used along with WREGIS to report RPS procurement and generation data for 2008, but not in subsequent years.[31] In reporting 2008 procurement data tracked in WREGIS, retail sellers used the WREGIS State/Provincial/Voluntary Compliance Report, and for reporting data not provided in the WREGIS Report, used the Interim Tracking System by submitting CEC-RPS-Track and CEC-RPS-Gen forms.

Staff has collected 2008 compliance year data and has begun the initial steps of the verification efforts. This work will include reconciling the reported renewable procurement claimed by the retail sellers with the generation data from various Energy Commission programs, generation data reported to the Energy Information Administration, and information provided by counterparts in other states and from entities representing the voluntary REC market. Upon completion of the procurement verification analyses, staff will likely hold a workshop to discuss the data review and then prepare a draft *2008 Verification Report* for public comment.

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29 *Joint Commission Report on Tracking System Operational Determination*, page 7.

HHttp://www.energy.ca.gov/2008publications/CEC-300-2008-001/CEC-300-2008-001-CMF.PDFH.

30 H*Renewables Portfolio Standard (RPS) Eligibility Guidebook*H *(FOURTH Edition),* Publication # CEC-300-2010-007-CMF, adopted December 15, 2010. Posted January 5, 2011.

31 For a description of the limited exceptions, please see the *RPS Guidebook (FOURTH Edition).* Hhttp://www.energy.ca.gov/2010publications/CEC-300-2010-007/CEC-300-2010-007-CMF.PDFH.

Typically a final verification report will be issued after comments on the draft version have been reviewed and, as appropriate, incorporated into the final report. Upon Energy Commission adoption at a business meeting, the report will be transmitted to the CPUC for use in evaluating retail sellers' verified compliance reports. Starting with the 2009 compliance year, staff anticipates using only WREGIS for RPS procurement and delivery verification purposes, except in a few situations as outlined in the *RPS Guidebook*. Staff expects to begin working on the *2009 Verification Report* in 2012.

SECTION 3: Procurement Verification Findings

This section presents procurement verification findings for IOUs, MJUs, and ESPs and updates findings presented in the *2006 Verification Report* for PacifiCorp and PG&E. A facility must be certified by the Energy Commission for its generation to be eligible for the RPS. If there was a discrepancy wherein procurement exceeded generation by 5 percent or greater, staff included the excess procurement as RPS-eligible if the retail seller provided supporting documentation, such as a copy of the retail seller's invoices of the excess procurement. This section provides the verified data necessary for the CPUC to determine retail sellers' progress toward meeting their RPS obligations. At the end of this section, there is a discussion of out-of-state delivery verification requirements for California's RPS.

As noted earlier, on January 31, 2011, Energy Commission staff held an RPS Procurement Verification Data Review Workshop to present initial verification results. Staff also sought public input on two issues related to the verification results: 1) RPS procurement claims from unbundled energy contracts, and 2) RPS procurement claims for generation associated with fossil fuel usage exceeding the de minimis amount. Public comments during and after the workshop were considered and incorporated into the appropriate retail seller's section below.

Within 30 days from the posting of the Energy Commission's adopted *Final 2007 RPS Verification Report*, retail sellers will need to file verified RPS compliance reports with the CPUC using Energy Commission-verified RPS procurement data.[32] Compliance reports are served on the service list for the RPS proceeding and made publicly available on the CPUC's website and, if applicable, include the amount of procurement the retail sellers propose to use from banking and from earmarking of future contracts.[33] The retail seller compliance reports and other information on the CPUC's website are the most appropriate ways to obtain information about RPS progress.[34]

RPS Procurement Verification Results

This subsection specifically compares procurement claims from each retail seller with available generation data for 2007 and reports on the eligibility of those RPS claims. It begins with a listing and explanation of the ineligible claims and then provides tables summarizing each retail sellers' procurement claims.

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32 CPUC, November 20, 2008, Assigned Commissioner's Ruling (R.08-08-009) http://docs.cpuc.ca.gov/efile/RULINGS/94088.pdf.

33 Banking occurs when a retail seller applies surplus RPS-eligible procurement from an earlier year to a later year with an RPS deficit. Earmarking of future contracts occurs when a retail seller applies future deliveries from an RPS-eligible contract to an earlier year with an RPS deficit.

34 CPUC's website and retail sellers' compliance reports can be found at: http://www.cpuc.ca.gov/PUC/energy/Renewables/compliance.htm.

Ineligible Claims

Table 1 identifies the ineligible claims. For 2007, staff identified some ineligible claims, all of which were made by SCE. Following the table is an explanation of the ineligibility of the procurement claims.

Table 1: SCE 2007 Ineligible RPS-Procurement

Facility Name	Fuel Type	Reason Ineligible	2007 Ineligible Procurement (kWh)
Mountain View I	Wind	Procurement Of Energy Only	132,570,843
Mountain View II	Wind	Procurement Of Energy Only	73,783,007
Colmac Energy Mecca Plant	Biomass	Procurement From Facility That Exceeded Fossil Fuel Usage Limit	49,368,420
Geo East Mesa	Geothermal	Procurement From Facility Without RPS Certification	40,893,151
		Total ineligible	**296,615,421**

Source: RPS staff analysis of SCE's 2007 CEC-RPS-TRACK form.

Mountain View

While discussed at a high level of detail at the 2007 staff workshop, the eligibility of SCE's Mountain View claims were addressed at length as part of the development of the *2006 Verification Report,* and the claims were ultimately determined to be ineligible for the RPS. The Center for Resource Solution's Green-e Energy program and 3Degrees Inc. provided written comments supporting staff's recommendation to maintain consistency in not counting SCE's claims from the Mountain View facilities as RPS-eligible in the *2007 Verification Report,* as was done in the *2006 Verification Report*. These entities cited their detailed comments provided for the *2006 Verification Report* on this topic and reiterated their concerns for an upset to the voluntary REC market if SCE were to get RPS credit because: 1) other entities rightfully purchased the renewable attributes associated with the generation, 2) there is the likelihood of litigation and contractual uncertainty, 3) SCE is not the rightful owner of the environmental attributes, and 4) it would set a dangerous precedent if RPS credit was allowed for an energy-only purchase. [35,36]

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35 To see the workshop comments go to: Hhttp://www.energy.ca.gov/portfolio/notices/index.html**H.**

36 A 2009 staff workshop for the *2006 Verification Report* addressed in detail the issue of the IOUs claiming RPS procurement from facilities under contracts with the Department of Water Resources (DWR), with a particular focus on SCE's procurement claims from a contract between DWR and the owners of the Mountain View Wind facilities. In short, the contract specifically designated ownership of the Renewable Energy Credits (RECs) – or renewable attributes – to the facility owners. The facility owners subsequently sold the RECs to third parties and later sold the facility itself to another entity. In the *2006 Verification Report*, this issue was described briefly in Section 2: Method and Section 3: Procurement Verification Findings, and discussed in detail in Appendix A: IOU Procurement From Facilities Under Contract With the Department of Water Resources for California's RPS Program. Because this issue was addressed at length in the *2006 Verification Report* where SCE's Mountain View claims were determined ineligible for

In a letter written to the Energy Commission and in verbal comments at the January 31, 2011, staff workshop,[37] SCE maintained its position that the Energy Commission should accept the Mountain View claims as RPS-eligible. SCE cited its detailed comments provided for the *2006 Verification Report*. Although initially reported as eligible in previous verification reports, the RECs associated with the generation from the Mountain View facilities were not part of the Department of Water Resources (DWR) energy procurement contract agreement that was assigned to SCE to administer as a result of California's 2001 electricity crisis. The associated RECs were contractually assigned to the facility owners and had been sold, bought, and claimed on the voluntary REC market. The Energy Commission is responsible for preventing double-counting; consequently, in addition to these claims not including the RECs, these claims were not allowed to be counted for RPS purposes to prevent double-counting. The CPUC should consider the unique circumstances surrounding SCE's procurement claims associated with Mountain View in making determinations on SCE's RPS compliance.

Colmac

Another of SCE's ineligible claims for 2007 is from a portion of the generation associated with fossil fuel use at the Colmac biomass facility. SCE claimed 100 percent of the 2007 generation from Colmac, which used 13.5 percent of fossil fuel in 2007. However, because the Colmac facility participated in the Existing Renewables Facilities Program (ERFP), its annual fossil fuel use was limited to a de minimis amount of 5 percent as specified in the *RPS Guidebook*. Specifically, the *RPS Guidebook* states "De minimus for purposes of existing facilities seeking RPS eligibility and funding under the Energy Commission's Existing Renewable Facilities Program is 5 percent of all fuels used and measured on an annual energy input basis." The *RPS Guidebook* also states that, "If the annual fossil fuel use at the facility exceeds a de minimus amount, then only the renewable portion of the electricity production can qualify for the RPS…."[38,] Consequently, only the renewable portion of Colmac's generation is eligible for the RPS.

In 2008, the Energy Commission determined that Colmac was not eligible to receive ERFP funding for 100 percent of its 2007 generation, because the facility exceeded the 5 percent de minimus fossil fuel limit, and that the facility could only receive ERFP funding for the renewable portion of its generation. At that time, staff advised SCE that, consistent with the ERFP funding decision, the *RPS Guidebook,* and the *ERFP Guidebook*, only the renewable portion of Colmac's 2007 generation would be considered RPS eligible. SCE responded that Colmac is a legacy qualifying facility (QF) and should be allowed to use up to 25 percent fossil fuel annually for the RPS, as was the case for QFs not participating in the ERFP. However, biomass facilities (including QFs) participating in the RPS and the ERFP have a 5 percent fossil fuel de minimus

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the RPS, staff has likewise identified SCE's 2007 Mountain View procurement claims as ineligible for the RPS.

37 http://www.energy.ca.gov/portfolio/documents/2011-01-31_workshop/2011-01-31_Transcript.pdf.

38 California Energy Commission, *Renewables Portfolio Standard Eligibility Guidebook*, Second Edition, p. 21. March 2007. Hhttp://www.energy.ca.gov/2007publications/CEC-300-2007-006/CEC-300-2007-006-CMF.PDFH p. 12.

amount; if the annual fossil fuel generation exceeds that amount, then only the generation attributable to the renewable fuel will count as RPS-eligible.[39]

At the January 31, 2011, staff workshop, SCE raised the issue of equity in the way certain renewable projects are treated over others as the RPS program has evolved.[40] SCE requested that the Energy Commission recognize these evolutions. A biomass consultant asked about the magnitude of Colmac's fossil fuel use. After realizing that SCE could still claim approximately 86.5 percent of the generation from the Colmac facility for RPS purposes, the consultant responded that the eligible amount sounded fair. He wanted to make sure that SCE was getting appreciable credit from the facility, as the generation is mostly biomass.

Geo East Mesa (GEM)

During the verification process for the 2007 compliance year, staff identified that SCE's procurement amount from the Ormesa 1 facility was 46.19 percent over the facility's total generation, the latter of which had been reported to the Energy Commission's Electricity Analysis Office. Staff asked SCE to provide documentation supporting its Ormesa 1 procurement claim.

In its October 2010 response letter, SCE indicated that there were two facilities (Ormesa 1 & 2) flowing into one meter. Both of the Ormesa facilities are RPS certified; however, SCE did not mention that its Ormesa procurement claims also included the generation from a third facility, the GEM facility. SCE explained that:

"Regarding the Ormesa project, RPS ID No. 60311, the total energy purchased in 2007 by SCE and the total amount of RPS credit claimed by SCE is in fact an aggregation of two distinct projects. In early 2007, as a result of a legal settlement between SCE and the owners of the Ormesa project, the contracts with Ormesa Unit 1 and Unit 2 (RPS ID No. 60312) were combined and subsequently approved by the California Public Utilities Commission. The resulting, single contract went into effect March 2007 and continued through the end of the year."[41]

Staff agreed to accept SCE's overclaim because the combined generation from the Ormesa facilities matched the meter data from these facilities, and staff believed that SCE was reporting more accurate "meter" data for these facilities, as was done previously for some of SCE's 2006 claims, as described below.

The WREGIS system uses metered data to create WREGIS Certificates – RECs. However, before the use of WREGIS, utilities used their procurement data to report their RPS claims in the Interim Tracking System. Procurement data is based on megawatt hours (MWhs) that coincide

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39 The de minimis fossil fuel use for biomass facilities participating in the ERFP changed in 2008 as a result of Senate Bill 1036 (Perata, Chapter 685, Statutes of 2007), which amended existing law and made biomass facilities eligible for ERFP funding and otherwise considered an in-state renewable facility for the RPS if they met certain fuel use requirements determined by the Energy Commission.

40 http://www.energy.ca.gov/portfolio/documents/2011-01-31_workshop/2011-01-31_Transcript.pdf

41 Letter sent to Energy Commission staff on October 7, 2010, RE: SCE RPS Overclaims 2007, from SCE staff.

with energy scheduled for delivery to customers, as documented on invoices between the generator facility and the utility. During the 2006 RPS procurement verification process, the Renewables Committee approved staff's recommendation to accept SCE's request to revise its RPS procurement claims using metered data rather than its original reporting, which included the scheduled generation. The original scheduled data matched the invoice data, but staff agreed with SCE's request because metered data was more accurate and in alignment with WREGIS operations, which would soon be used instead of procurement data.

In 2005, SCE certified the Ormesa 1 and Ormesa 2 facilities for the RPS, but did not apply for RPS certification for the GEM facility; presumably SCE was not procuring from GEM at that time because of a 1998 termination agreement between GEM and SCE.

In July 2008, SCE registered the Ormesa 1, Ormesa 2, and GEM facilities with WREGIS. SCE then reported to Energy Commission staff the WREGIS Generating Unit ID numbers for the Ormesa 1 and Ormesa 2 facilities, but not the WREGIS GU ID number for the GEM facility. Staff subsequently confirmed the RPS eligibility status for the Ormesa 1 and Ormesa 2 facilities to WREGIS. Since staff did not receive a WREGIS GU ID number for the GEM facility, staff was unaware of its existence, and therefore, an eligibility confirmation was never submitted to WREGIS for GEM.

In April 2011, staff received an application from SCE for RPS certification of the GEM facility. Staff received a follow-up letter from SCE regarding its 2007 procurement claims, stating that due to "an odd confluence of circumstances," the GEM facility had not been previously RPS-certified. However, SCE had procured and claimed renewable energy from GEM for RPS dating back to 2007 by combining GEM generation data with data from the Ormesa 1 facility, and using the RPS identification number for Ormesa 1. SCE explained that it found out through a 2007 audit that GEM's generation was flowing through the combined meter. However, SCE did not submit an application for RPS certification of the GEM facility until April 2011, even though SCE had been reporting the GEM procurement under the Ormesa 1 RPS ID number since its 2007 procurement agreement and had registered the GEM facility with WREGIS in 2008.

Earlier *RPS Eligibility Guidebooks* allowed retail sellers to submit applications for RPS certification and, once certified, would allow all previous generation from that facility to count as RPS eligible. Beginning in January 2008, however, the third edition of the guidebook added limits to this practice, stating that:

> "Procurement may count toward a retail seller's RPS obligation if the generating facility was RPS certified at the time of procurement or applied for RPS certification or pre-certification at the time of procurement." [42]

This limit was put in place to encourage online renewable facilities to become RPS-certified, and to disallow generation that predated the applicant's signed attestation that accompanies the application stating that the facility met all RPS eligibility requirements.

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42 California Energy Commission, *Renewables Portfolio Standard Eligibility Guidebook Third Edition*, January 2008. CEC-300-2007-006-ED3-CMF, Page 28.

To address pre-2008 procurement from uncertified facilities, to encourage retail sellers to certify all of their facilities from which they were procuring pre-2008 generation, and to prevent having to make revisions to the Energy Commission's RPS verification findings for earlier years, the fourth edition of the *RPS Eligibility Guidebook,*[43] adopted by the Energy Commission in December 2010, updated this provision by stating:

> "This Fourth Edition provides notice that going forward, the Energy Commission will no longer count pre-2008 procurement toward a retail seller's RPS obligation unless the facility was certified at the time of the procurement or the Energy Commission receives an application for certification before March 1, 2011."

Since staff did not receive an application for RPS certification from SCE for the GEM facility until April 2011, SCE's procurement from the GEM facility before April 2011 will not count toward SCE'S RPS obligations.

Summary Tables

The following summary tables show RPS procurement for 2007:

- Total RPS Procurement Claimed
- Disallowances
- Total Disallowances
- Procurement Eligible Toward the RPS
- 2007 Annual Retail Sales

Table 2 is the summary of IOU 2007 RPS procurement claims. Table 3 is the summary of MJU RPS procurement claims. Table 4 is the summary of ESP RPS procurement claims.

Modified CEC-RPS-Track forms for all retail sellers are provided in Appendix B: Individual Retail Sellers' Modified RPS Track Forms. The modified CEC-RPS-Track forms compare each retail sellers' procurement claim for each facility with the generation totals from each facility, when available.

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43 California Energy Commission, *Renewables Portfolio Standard Eligibility Guidebook Fourth Edition*, January 2011. CEC-300-2010-007-CMF. Page 42, Footnote 68.

Table 2: Summary of IOU RPS Procurement (kWh) for 2007

	PG&E	SDG&E	SCE
Total RPS Procurement Claimed[1]	9,046,397,192	880,777,090	12,466,867,294
Disallowances			
Procurement From Facilities Without RPS-Certification[2]	0	0	40,893,151
Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater[3]	0	0	0
Procurement From Distributed Generation Facilities[4]	0	0	0
Procurement of Energy Only[5]	0	0	206,353,850
Procurement From Facilities That Exceeded Fossil Fuel Usage Limit[6]	0	0	49,368,420
Total Disallowances	0	0	296,615,421
Procurement Eligible Toward the RPS[7]	9,046,397,192	880,777,090	12,170,251,873
2007 Annual Retail Sales[8]	79,078,319,014	17,056,023,802	79,505,151,004

1 This amount was reported to the Energy Commission by the retail seller on their RPS-Track forms.

2 Facilities must be certified as RPS-eligible with the California Energy Commission for procurement to be counted toward the RPS.

3 Procurement from each facility was compared to generation reported for that facility to either the federal Energy Information Administration or various reporting programs at the Energy Commission. For facilities with more than one data source available for the generation amount, the highest amount was selected. Unless the retail seller provides documentation to support the RPS procurement claim, such as an invoice, the procurement amount exceeding the generation amount is not counted. Energy Commission staff requires supporting documentation for claims exceeding generation by 5 percent or greater.

4 Procurement from distributed generation facilities is not eligible at this time. Page 4 of the *RPS Eligibility Guidebook*, *Second Edition*, states, "The Energy Commission will certify distributed generation as RPS-eligible only if and when the CPUC authorizes applying tradable RECs toward RPS obligation."

5 Page 3 of the *RPS Eligibility Guidebook*, *Second Edition*, states, "RECs and energy procured together as a bundled commodity are eligible for the California RPS."

6 Page 21 of the *RPS Eligibility Guidebook*, *Second Edition*, states that “if the annual fossil fuel use at the facility exceeds a de minimus amount, then only the renewable portion of the electricity production can qualify for the RPS.”

7 This is the total RPS procurement for each year that excludes ineligible RPS procurement claims.

8 The CPUC uses the utility's previous year's retail sales number to calculate the Annual Procurement Target for that facility. This amount was reported to the Energy Commission by the retail seller on the RPS-Track form.

Source: RPS staff analysis of IOU’s 2007 CEC-RPS-TRACK forms.

Table 3: Summary of MJU RPS Procurement (kWh) for 2007

	PacifiCorp	Sierra Pacific Power
Total RPS Procurement Claimed[1]	56,132,145	48,833,000
Disallowances		
Procurement From Facilities Without RPS-Certification[2]	0	0
Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater[3]	0	0
Procurement From Distributed Generation Facilities[4]	0	0
Procurement of Energy Only[5]	0	0
Procurement From Facilities That Exceeded Fossil Fuel Usage Limit[6]	0	0
Total Disallowances	0	0
Procurement Eligible Towards the RPS[7]	56,132,145	48,833,000
2007 Annual Retail Sales[8]	884,865,309	544,409,790

1 This amount was reported to the Energy Commission by the retail seller on their RPS-Track forms.

2 Facilities must be certified as RPS-eligible with the California Energy Commission for procurement to be counted toward the RPS.

3 Procurement from each facility was compared to generation reported for that facility to either the federal Energy Information Administration or various reporting programs at the Energy Commission. For facilities with more than one data source available for the generation amount, the highest amount was selected. Unless the retail seller provides documentation to support the RPS procurement claim, such as an invoice, the procurement amount exceeding the generation amount is not counted. Energy Commission staff requires supporting documentation for claims exceeding generation by 5 percent or greater.

4 Procurement from distributed generation facilities is not eligible at this time. Page 4 of the *RPS Eligibility Guidebook*, *Second Edition*, states, “The Energy Commission will certify distributed generation as RPS-eligible only if and when the CPUC authorizes applying tradable RECs toward RPS obligation."

5 Page 3 of the *RPS Eligibility Guidebook*, *Second Edition*, states, "RECs and energy procured together as a bundled commodity are eligible for the California RPS."

6 Page 21 of the *RPS Eligibility Guidebook*, *Second Edition*, states that “if the annual fossil fuel use at the facility exceeds a de minimus amount, then only the renewable portion of the electricity production can qualify for the RPS.”

7 This is the total RPS procurement for each year that excludes ineligible RPS procurement claims.

8 The CPUC uses the utility's previous year's retail sales number to calculate the Annual Procurement Target for that facility. This amount was reported to the Energy Commission by the retail seller on the RPS-Track form.

Source: RPS staff analysis of MJU’s 2007 CEC-RPS-TRACK forms.

Table 4: ESP Aggregated Summary of RPS Procurement (kWh) for 2007

	2007 RPS Procurement Claims	2007 Annual Retail Sales[8]
3Phases Energy Services[1]	7,166,000	27,193,000
APS Energy Services[1]	82,759,000	2,375,000,000
Calpine PowerAmerica-CA[1]	118,824,000	991,951,867
Commerce Energy, Inc	14,807,000	587,240,668
Constellation NewEnergy[1]	101,640,000	4,493,621,288
Coral Power LLC	10,600,000	186,533,000
Pilot Power Group, Inc[1]	41,201,920	1,173,747,940
Sempra Energy Solutions[1]	180,084,068	4,575,024,000
Strategic Energy, LLC [1]	338,989,000	3,943,615,000
Total RPS Procurement Claims	**896,070,988**	**18,353,926,763**
Disallowances		
Procurement From Facilities Without RPS-Certification[2]	0	
Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater[3]	0	
Procurement From Distributed Generation Facilities[4]	0	
Procurement of Energy Only[5]	0	
Procurement From Facilities That Exceeded Fossil Fuel Usage Limit[6]	0	
Total Disallowances[7]	0	
Total Aggregated ESP Procurement Eligible Toward the RPS[6]	**896,070,988**	

1 This amount was reported to the Energy Commission by the retail seller on the CEC-RPS-Track forms.

2 Facilities must be certified as RPS-eligible with the California Energy Commission for procurement to be counted toward the RPS.

3 Procurement from each facility was compared to generation reported for that facility to either the federal Energy Information Administration or various reporting programs at the Energy Commission. For facilities with more than one data source available for the generation amount, the highest amount was selected. Unless the retail seller provides documentation to support the RPS procurement claim, such as an invoice, the procurement amount exceeding the generation amount is not counted. Energy Commission staff requires supporting documentation for claims exceeding generation by 5 percent or greater.

4 Procurement from distributed generation facilities is not eligible at this time. Page 4 of the *RPS Eligibility Guidebook, Second Edition*, states, "The Energy Commission will certify distributed generation as RPS-eligible only if and when the CPUC authorizes applying tradable RECs toward RPS obligation."

5 Page 3 of the *RPS Eligibility Guidebook, Second Edition*, states, "RECs and energy procured together as a bundled commodity are eligible for the California RPS."

6 Page 21 of the *RPS Eligibility Guidebook, Second Edition*, states that “if the annual fossil fuel use at the facility exceeds a de minimus amount, then only the renewable portion of the electricity production can qualify for the RPS.”

7 This is the total RPS procurement for each year that excludes ineligible RPS procurement claims.

8 The CPUC uses the utility's previous year's retail sales number to calculate the Annual Procurement Target for that facility. This amount was reported to the Energy Commission by the retail seller on the RPS-Track form.

Source: RPS staff analysis of ESP’s 2007 CEC-RPS-TRACK forms

Resolution of Outstanding 2007 Claims

While SCE is the only retail seller with outstanding claims for the 2007 compliance year, staff worked with retail sellers to resolve multiple potentially ineligible claims or partially ineligible claims. Most of the initial ineligible claims were due to concerns about over procurement, meaning the facility did not generate enough electricity to support the claim, or double-counting, meaning two entities claimed the same RPS procurement. Additionally, during staff collaboration with the Public Utilities Commission of Nevada (PUCN), a facility's total generation was identified as being claimed for Nevada's RPS program and also for California's RPS program. Consequently, the retail seller's procurement claim was determined not eligible for California's RPS. The retail seller removed the claim from its RPS-Track form.

In all, eight retail sellers submitted 16 revised RPS-Track forms, including revisions to procurement claims from compliance years 2004-2006. The revisions to previous procurement claims from earlier compliance years are discussed below.

Revisions to Previous Years' Procurement Claims

During the verification process, staff identified some discrepancies with procurement claims from earlier compliance years. PG&E and PacifiCorp revised their previous years' RPS-Track forms to account for these discrepancies. Because these changes affect procurement claims from previously reported compliance years, staff is including tables showing the changes to the data for previous years. Furthermore, PG&E and PacifiCorp should adjust these values in their 2007 verified compliance reports filed with the CPUC to account for these changes.

As a result of the concern identified with the Colmac facility exceeding the fossil fuel de minimus amount, staff audited multifuel facilities to better ensure that the facilities met the RPS fossil fuel requirements. During this process, PG&E identified a facility that was incorrectly certified as a multifuel facility, which was actually a cogeneration facility using roughly 30 percent fossil fuel annually. As a result of this discovery, PG&E revised its RPS-Track forms, minus the fossil fuel amount used and claiming only the renewable generation amount for years 2004-2006. Table 5 shows the revised amounts eligible for the RPS.

Table 5: PG&E's Revised RPS Procurement for Previous Years (kWh)

			2004	2005	2006
Previously Verified Procurement Eligible Toward the RPS[1]			8,660,061,189	8,706,601,484	9,118,029,879
Facility Name	**Fuel Type**	**Type of Revision**			
City of Watsonville	Digester Gas	Amount Associated with Fossil Fuel	-2,745	-3,000	-45,745
Updated Procurement Eligible Towards the RPS[2]			**8,660,058,444**	**8,706,598,484**	**9,117,984,134**

1 This amount was reported as PG&E's Procurement Eligible Towards the RPS in the *2006 Verification Report*. Due to the procurement claim revisions on PG&E's CEC-RPS-Track forms listed above, PG&E's Procurement Eligible Towards the RPS for 2004, 2005, and 2006 have been adjusted downward.

2 PG&E's correct total eligible RPS procurement for 2004, 2005, and 2006.

Source: RPS staff analysis of PG&E revised 2004 - 2006 CEC-RPS-TRACK forms.

PacifiCorp staff notified the Energy Commission of its concern about the possible double-counting of procurement from Hill Air Force Base (AFB). The issues are summarized as follows:

- PacifiCorp buys energy from a qualifying facility (QF) located on Hill AFB.
- Hill AFB reports the landfill gas (LFG) that is sent to the QF for fuel (in MMBTU) to the Energy Policy Act[44] of 2005 program (EPACT 2005).
- RECs from the QF may be ineligible to be claimed by reporting agencies (such as Hills AFB) under EPACT rules that provide: "Agencies may not count renewable energy or REC purchases from resources that are included in the utility's normal generation mix. Agencies may not count renewable energy or REC purchases that have been paid for by captive utility ratepayers unless the revenue or further sale of the renewable energy or RECs is returned to those ratepayers or used for renewable resource development."[45]
- The CPUC Decision 08-08-028 definition of a REC[46] states that a REC for compliance with California's RPS is:

> "a certificate of proof, issued through the Western Renewable Generation Information System, that one megawatt-hour of electricity was generated by an RPS-eligible renewable energy resource and delivered for consumption by California end-use retail customers. A REC includes all renewable and environmental attributes associated with the production of electricity from the eligible renewable energy resource, including any avoided emission of pollutants to the air, soil or water; any avoided emissions of carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, or any other greenhouse gases that have been determined by the United Nations Intergovernmental Panel on Climate Change, or otherwise by law, to contribute to the actual or potential threat of global climate change;[47] and the reporting rights to these avoided emissions, such as Green Tag reporting rights.[48] "

If the renewable benefits from the electricity generated by Hills AFB have been reported to the EPACT program, the procurement is not eligible for California's RPS program. PacifiCorp is working on documenting that the Hill AFB procurement claim should not have been reported to EPACT and that it would not represent double-counting if counted for California's RPS. If

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44 http://www1.eere.energy.gov/femp/pdfs/epact05_fedrenewenergyguid.pdf.

45 Ibid. 3.3.3 Purchases Not Qualified for Credit page 11.

46 Hhttp://docs.cpuc.ca.gov/published/final_decision/86954.htmH page 44.

47 Avoided emissions may or may not have any value for GHG compliance purposes. Although avoided emissions are included in the definition of the REC, this definition does not create any right to use those avoided emissions to comply with any GHG regulatory program.

48 Green Tag reporting rights are the right to report the ownership of accumulated Green Tags in compliance with federal or state law, if applicable, and to a federal or state agency or any other party and include without limitation those Green Tag reporting rights accruing under Section 1605(b) of the Energy Policy Act of 1992 and any present or future federal, state, or local law, regulation or bill, and international or foreign emissions trading program.

Energy Commission staff is able to verify PacifiCorp's claim as RPS-eligible, PacifiCorp will revise its RPS-Track form to include procurement from Hill AFB. Until then, the Hill AFB procurement is ineligible for the RPS, and PacifiCorp has removed the claim from previous RPS-Track forms for compliance years 2005-2006.

PacifiCorp also inquired about the RPS eligibility date of the Dillard Cogeneration facility from which it procured energy in 2007 and also from 2005-2006. Because the facility's RPS eligibility began in 2005, PacifiCorp revised its RPS-Track forms to include procurement from the Dillard cogeneration facility for these earlier years. Energy Commission staff determined these claims to be RPS-eligible, and they are listed in Table 6.

Table 6: PacifiCorp's Revised RPS Procurement for Previous Years (kWh)

			2005	2006
Previously Verified Procurement Eligible Towards the RPS[1]			58,656,803	70,577,239
Facility Name	**Fuel Type**	**Type of Revision**		
Hill Air Force Base	Landfill Gas	Removed Procurement Claim Because of Double-Counting Concern	-129,817	-115,933
Dillard Cogeneration Facility	Biomass	Added Procurement From an RPS-certified Facility Not Previously Claimed	0	1,250,690
Updated Procurement Eligible Towards the RPS[2]			**58,526,987[A]**	**71,711,997[A]**

1 This amount was reported as PacifiCorp's Procurement Eligible Toward the RPS in the *2006 Verification Report*. Due to the procurement claim revisions on PacifiCorp's CEC-RPS-Track forms listed above, PacifiCorp's Procurement Eligible Toward the RPS for 2005 and 2006 have been adjusted.

2 PacifiCorp's correct total RPS procurement for 2005 and 2006.

A Totals may not sum due to rounding.

Source: RPS staff analysis of PacifiCorp revised 2005 and 2006 CEC-RPS-TRACK forms.

Verification of RPS Delivery From Out-of-State Procurement

During the verification process, staff verified procurement from the one RPS-eligible out-of-state facility that was claimed. PG&E claimed RPS-eligible procurement from the Klondike Wind Power III facility located in Oregon. To report that energy from this procurement claim was delivered into California, as required in the *RPS Guidebook*, PG&E submitted a CEC-RPS-Delivery form confirming that its procurement claim met the delivery requirements from out-of-state facilities.

Staff reviewed the delivery data and requested that PG&E provide random samples of NERC e-Tags, with the confidential information redacted, to better determine that the energy delivery requirements were met. Staff verified that the NERC e-Tags included PG&E's Purchasing Selling-Entity code, the facility's RPS ID number, a point of receipt located outside California, and a final point of delivery located inside California. Since the NERC e-Tags and CEC-RPS-Delivery form contained the required delivery information, staff determined that PG&E

complied with the energy delivery requirements for out-of-state procurement and determined the out-of-state facility procurement claim was RPS-eligible.

SECTION 4: Procurement Verification Analysis

Availability of Generation Data to Verify RPS-Eligible Procurement

Energy Commission staff verifies the accuracy of RPS procurement claims with generation data reported to various programs within the Energy Commission and/or to the U.S. Energy Information Administration (EIA). In some cases, as noted earlier in this report, Energy Commission staff requested and received supporting information, such as retail seller invoices, to verify procurement when the facility-level comparison of total procurement claims with generation data indicated that procurement exceeded generation by 5 percent or greater.

As shown in Table 7, the availability of data to verify the RPS-eligible procurement claims falls into one of three categories: 1) generation data from various sources (Energy Commission or EIA programs); 2) retail seller supporting information, such as procurement invoices; and 3) procurement from utility-certified facilities for which generation data were not available. In all cases where there was no source of generation data, the facilities were utility-certified or owned.[49] Table 7 below compares the availability of generation data for 2007 RPS-eligible procurement.

Table 7: Generation Data for 2007 RPS-Eligible Procurement

Retail Seller 2007	Various Sources Generation Data [1]		Retail Seller Supporting Information[2]		Utility-Certified Facilities[3]	
	Number of Facilities	Energy Procured (MWh)	Number of Facilities	Energy Procured (MWh)	Number of Facilities	Energy Procured (MWh)
PG&E	135	6,997,875	6	876,139	90	1,172,383
SCE	99	9,154,475	9	1,357,565	71	1,658,212*
SDG&E	19	877,761	1	1,500	3	1,517
PacifiCorp	38	39,947	0	0	14	16,185
Sierra Pacific	17	46,963	0	0	1	1,870
Aggregated ESPs	47	896,071	0	0	0	0
Totals	**355**	**18,013,092**	**16**	**2,235,204**	**179**	**2,850,167***
Percent Total Claims	**64.55%**	**77.98%**	**2.91%**	**9.68%**	**32.55%**	**12.34%**

Amounts are converted from kWh to MWh. Rounding may result in total amounts listed in this table differing slightly from the total procurement eligible toward the RPS listed in retail sellers' Summary of RPS Procurement table.

1 Amounts verified with generation data from various generation sources (Energy Commission programs and the federal Energy Information Administration).

2 Amounts verified with retail seller supporting information, such as invoices.

49 As stated on page 47 in the *RPS Eligibility Guidebook, Third Edition*, the retail seller is responsible for reporting the generation data for the facilities it certifies on the facilities' behalf. This reporting requirement is satisfied though the CEC-RPS-Track forms. Therefore, for utility-certified facilities where there is no reported generation data available, the procurement amount reported on the RPS-Track form is accepted without further verification.

3 Procurement from utility-certified facilities for which generation data was not available.
*Amount updated from Draft 2007 Verification Report to remove Geo East Mesa facility procurement because the facility was not RPS-certified.

Source: RPS staff analysis of the 2007 CEC-RPS-TRACK forms received from participating retail sellers.

Also shown in Table 7, the majority of the 2007 RPS procurement claims were verified with generation data from the Energy Commission or EIA, representing 77.98 percent of the total amount of RPS-eligible procurement claimed from 64.55 percent of the total number of facilities. The absence of generation data for utility-certified procurement claims accounted for 12.34 percent of the total amount of RPS-eligible procurement, representing 32.55 percent of the total number of facilities. Procurement that was verified after receiving supporting documentation from the utility accounted for 9.68 percent of the total amount of RPS-eligible procurement from 2.91 percent of the total number of facilities.

The *2006 Verification Report* shows the availability of data for 2001 and 2003-2006.

RPS-Eligible Procurement by Resource Type

Increasing the diversity of California's energy mix is an important goal of the RPS program.[50] There is also interest in understanding which technologies are being used to meet the RPS. To see the trends over time, staff is including years 2005-2007 in Table 8 below, which presents the details of the renewable resource mix.[51]

Staff's analysis of the data demonstrates that the renewable resource mix that was used to satisfy retail sellers' RPS requirements over the years has been diverse with the different retail sellers procuring large portions of their renewable electricity from various resources. For instance, PG&E procured electricity from more biomass-fueled facilities than other resources, except in 2006 where small hydroelectric was the most procured, while SCE's resource mix had more geothermal RPS procurement. For SDG&E's procurement, wind was the largest resource, except in 2005 when the highest procurement was from biomass. As for the MJUs, PacifiCorp's procurement was largely from small hydroelectric-fueled facilities, and Sierra Pacific Power procured more geothermal electricity. Also shown in Table 8, the renewable resource type most used by the ESPs in prior years has changed perhaps due to only a few ESPs reporting for the early years of the RPS program and more reporting by 2007. In 2005, the renewable procurement from small hydroelectric was slightly higher than other resources. However, in 2006 and 2007, geothermal procurement was the main fuel source.

When comparing 2007 data with 2005 and 2006 data, proportionally, the total amounts by fuel type have remained fairly consistent, with geothermal remaining the largest renewable fuel type and biomass, wind, and small hydroelectric vying for second, third, and fourth largest over the three years.

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50 Public Utilities Code Section 399.11.

51 For 2001 and 2003-2004 see the *2006 RPS Procurement Verification Report*.

A list of RPS-eligible resource categories can be found on page 14 in the *RPS Eligibility Guidebook, Fourth Edition.* Other RPS-eligible resources, including biodiesel, MSW conversion, ocean wave, ocean thermal, and tidal current, are not included in this table because there were no procurement claims made for them during this period.

Table 8: 2005-2007 RPS-Eligible Procurement by Resource Type (MWh[1])

	PG&E	SCE	SDG&E	PacifiCorp	Sierra Pacific	ESPs[2]	Total
Biomass	2,751,441	316,324	217,967	2,791	5,147	0	3,293,670
Conduit Hydro	123,629	164,872	21,302	8,284	2,375	15,252	335,714
Digester Gas	1,939	1,060	18,466	0	0	0	21,465
Geothermal	2,702,133	7,673,202*	0	3,019	39,440	761,140	11,178,934*
Landfill Gas	150,729	579,683	153,184	0	0	57,447	941,043
MSW, Combustion	140,437	0	0	0	0	0	140,437
Photovoltaic	226	0	0	0	0	0	226
Small Hydroelectric	1,792,696	393,539	0	27,366	0	62,232	2,275,833
Solar Thermal	0	666,865	0	0	1,870	0	668,735
Wind	1,383,165	2,374,707	469,859	14,672	0	0	4,242,403
2007 Total	**9,046,395**	**12,170,252***	**880,778**	**56,132**	**48,832**	**896,071**	**23,098,462***
Biomass	2,775,320	365,831	284,031	1,251	0	0	3,426,433
Conduit Hydro	139,255	212,587	11,584	10,052	0	23,551	397,029
Digester Gas	3,927	1,329	21,243	0	0	0	26,499
Geothermal	1,790,870	7,590,196	0	3,502	0	259,065	9,643,633
Landfill Gas	161,254	733,672	179,895	0	0	16,981	1,091,802
MSW, Combustion	135,716	0	0	0	0	0	135,716
Photovoltaic	3	0	0	0	0	0	3
Small Hydroelectric	3,087,040	735,812	0	52,846	0	96,488	3,972,186
Solar Thermal	0	613,050	0	0	0	0	613,050
Wind	1,024,600	2,233,524	402,768	4,062	0	0	3,664,954
2006 Total	**9,117,985**	**12,486,001**	**899,521**	**71,713**	**0**	**396,085**	**22,971,305**
Biomass	2,920,370	361,772	298,945	0	0	0	3,581,087
Conduit Hydro	93,279	190,874	11,700	7,441	0	22,675	325,969
Digester Gas	9,378	2,473	23,768	0	0	0	35,619
Geothermal	1,680,710	7,935,304	0	3,473	0	14,503	9,633,990
Incremental Hydro	0	0	0	0	0	43,262	43,262
Landfill Gas	217,251	752,448	194,455	0	0	0	1,164,154
MSW, Combustion	139,882	0	0	0	0	0	139,882
Photovoltaic	4	0	0	0	0	0	4
Small Hydro	2,771,526	680,401	0	47,614	0	55,966	3,555,507
Solar Thermal	0	622,100	0	0	0	0	622,100
Wind	874,198	2,276,816	296,434	0	0	0	3,447,448
2005 Total	**8,706,598**	**12,822,188**	**825,302**	**58,528**	**0**	**136,406**	**22,549,022**

1 Amounts are converted from kWh to MWh. Rounding may result in total amounts listed in this table differing slightly from the total procurement eligible toward the RPS listed in retail sellers' Summary of RPS Procurement table.

2 Aggregated ESPs reporting for 2007.

*Amount updated from Draft 2007 Verification Report to remove Geo East Mesa facility procurement because the facility was not RPS-certified.

Source: RPS staff analysis of the 2005-2007 CEC-RPS-TRACK forms received from participating retail sellers.

Total RPS-Eligible Specific Purchases

Table 9 identifies the total number of specific purchases (the retail seller's procurement from a specific renewable facility) from RPS-eligible facilities and the quantity of electricity procured for 2005-2007. The table shows that RPS-eligible procurement by California's retail sellers has increased over these years. In 2007, the retail sellers claimed 23,098,462 MWh of procurement from about 550 RPS-eligible facilities for RPS compliance.

Table 9: 2005-2007 Total RPS-Eligible Specific Purchases

	2007		2006		2005	
Retail Seller	**Number of RPS-Eligible Facilities Claimed**	**RPS-Eligible Procurement (MWh)**	**Number of RPS-Eligible Facilities Claimed**	**RPS-Eligible Procurement (MWh)**	**Number of RPS-Eligible Facilities Claimed**	**RPS-Eligible Procurement (MWh)**
PG&E	231	9,046,397	225	9,117,984	226	8,706,598
SCE	179	12,170,252*	175	12,485,998	177	12,822,189
SDG&E	23	880,777	22	899,520	19	825,302
PacifiCorp	52	56,132	50	71,712	47	58,527
Sierra Pacific Power	18	48,833	0	0	0	0
Aggregated ESPs	47	896,071	17	396,085	7	136,406
***Total**	**550**	**23,098,462***	**489**	**22,971,299**	**476**	**22,549,022**

* In some cases, retail sellers may have claimed RPS procurement from the same facilities, and therefore the total number may not reflect the actual number of RPS-certified facilities in California.

Amounts have been converted from kWh to MWh for ease of reading. Due to rounding, the total amounts listed in this table may differ slightly from the total procurement eligible toward the RPS listed in the retail sellers' Summary of RPS Procurement table.

The total number of facilities claimed may appear to exceed the actual number of RPS-eligible facilities being claimed for RPS purposes because some retail sellers claim from the same facility, and the individual facility claims listed in Tables 5 would be represented more than once with each retail seller claiming from that facility.

*Amount updated from Draft 2007 Verification Report to remove Geo East Mesa facility procurement because the facility was not RPS-certified.

Source: RPS staff analysis of the 2005-2007 CEC-RPS-TRACK forms received from participating retail sellers.

New and Repowered RPS Procurement

Beginning on January 1, 2007, amendments to Public Resources Code Sections 25741 and 25743 by SB 107 changed the definition of new and repowered renewable procurement to require an initial operation or repowering date of January 1, 2005, from the previous requirement of January 1, 2002.

Based on the information submitted on CEC-RPS-Track filings for procurement of generation that staff determined to be RPS-eligible, Table 10 shows the amount of new and repowered renewable procurement by retail seller. The amounts shown represent the amount of

procurement from facilities with an initial operation or repowering date of January 1, 2005. The total amount of generation from new or repowered facilities claimed by all retail sellers represents approximately 2.75 percent of total procurement.

Table 10: 2007 New and Repowered Renewable Procurement

Retail Seller	2007 Procurement (MWh)
3Phases Energy Services	0
APS Energy Services	0
Constellation NewEnergy, Inc.	16,200
Sempra Energy Solutions	0
Strategic Energy, LLC	13,200
PacifiCorp	11,098
Sierra Pacific Power Company	10,887
PG&E	384,930
SCE	0
SDG&E	198,047
Total	**634,362**
Amounts have been converted from kWh to MWh for ease of reading. Due to of rounding, the total amounts listed in this table may differ slightly from the total procurement eligible toward the RPS listed in the retail sellers' Summary of RPS Procurement table.	

Source: RPS staff analysis of 2007 CEC-RPS-TRACK forms received from participating retail sellers.

Table 11 shows the RPS-eligible procurement from new and repowered facilities separated by fuel type. For 2007, the largest portion of RPS-eligible new and repowered procurement comes from wind powered facilities; however, there were also notable new and repowered procurement from geothermal, landfill gas, and conduit hydroelectric. Some solar also came from new and repowered facilities.

Table 11: 2007 New and Repowered Procurement by Fuel Type

Fuel Type	2007 Procurement (MWh)
Biomass	0
Biogas	0
Conduit Hydroelectric	17,519
Geothermal	64,543
Landfill Gas	32,521
Municipal Solid Waste	0
Small Hydro	0
Solar	2,096
Wind	517,684
Total Renewable Procurement	**634,363**
Amounts have been converted from kWh to MWh for ease of reading. Due to rounding, the total amounts listed in this table may differ slightly from the total procurement eligible toward the RPS listed in the retail sellers' Summary of RPS Procurement table.	

Source: RPS staff analysis of 2007 CEC-RPS-TRACK forms received from participating retail sellers.

SECTION 5: Limitations of the Interim Tracking System

This report presents Energy Commission staff's verified RPS procurement data results; however, some limitations should be noted.

The Interim Tracking System restricts the extent to which the Energy Commission staff can cross-reference California RPS procurement with other specific purchases. As mentioned in Section 2: Method, subsection Coordinating With Other States to Ensure Against Double-Counting of RECs, Energy Commission staff coordinates with staff from energy agencies in Washington, Oregon, and Nevada to cross-reference California RPS procurement with retail claims made in these states. Coordination with Oregon and Washington has focused largely on an energy information/tracking system that was funded by a U.S. Department of Energy grant.

This interstate tracking system was developed to support the administration of the Power Source Disclosure Program by enabling the participating states to determine if generation was claimed in more than one of these states. Energy Commission staff was able to obtain energy procurement data for 2007 produced by this tracking system; however, the state of Washington is no longer able to continue operation of the tracking system. Starting with the 2008 compliance year, Energy Commission staff will be using WREGIS to track generation and procurement and will no longer rely on the tracking system mentioned above.

Staff also collaborated with the Public Utilities Commission of Nevada to confirm that procurement from the 18 facilities located in Nevada and being claimed for California RPS purposes did not exceed generation when Nevada procurement amounts were combined with California procurement amounts. This staff coordination led to the identification of procurement claimed for both California's and Nevada's RPS, which was consequently determined ineligible for California's RPS. Details of this coordination are also discussed in Section 2: Method, subsection Coordinating With Other States to Ensure Against Double-Counting of RECs.

In addition, staff's ability to protect against double-counting is limited to the reporting requirements for each state. With PacifiCorp and Sierra Pacific submitting procurement claims for this report and more procurement anticipated from out-of-state, coordination with other states is becoming more important for verification purposes. Fortunately, staff anticipates concerns about double counting of RPS procurement claimed in California and in other states will be reduced with the switch from the Interim Tracking System to WREGIS.

Further, staff has limited information about specific purchases made in which RECs are sold separately from the associated electricity.[52] "Unbundled" RECs were determined eligible for

52 RECs represent the "renewable" quality of electricity generated from a renewable facility. A REC is created when a specific amount of renewable energy is generated; one MWh of renewable energy

RPS compliance in California with the CPUC's January 2011 T-REC decision. [53,54] Energy Commission staff is updating the *RPS Guidebook* to incorporate this decision, which does not affect procurement from 2007.

In other regulatory and non-regulatory markets, however, generators, marketers, or brokers may sell "unbundled" RECs as a separate commodity to individuals, companies, utilities, or other organizations. The Energy Commission does not track these voluntary transactions but has started collaborating with voluntary market organizations such as Green-e Energy.[55] As a result of this collaboration, Energy Commission staff is able to cross-check some, but not all, RPS procurement claims with unbundled RECs sold in the voluntary market, as Green-e Energy does not certify the entire voluntary REC market.

The robustness of the Interim Tracking System is also limited by the quality of the generation data. In most cases, the generation data used for this report is self-reported and not independently verified by third parties. WREGIS will help address many of these data limitations because it will track renewable energy transactions throughout the WECC (not just California, Nevada, Oregon, and Washington) and be supported in most cases by generation data from qualified reporting entities rather than self-reported generation data. WREGIS will be used for RPS verification for part of 2008 and all of 2009 and years hence, with limited exceptions.

Procurement Verification

Staff has developed an Access® database that allows for more accurate and efficient verification of RPS procurement claims. For example, the database allowed staff to revisit earlier year RPS procurement claims and compare the claims with previously unavailable generation data. Generation data is periodically updated. Using the database, if staff found a discrepancy in which total annual procurement from a specific facility appeared to exceed total annual generation from that facility by 5 percent or greater, staff requested supporting information from the retail seller(s) making the procurement claim(s).

Following this approach, Energy Commission staff requested supporting information from the retail sellers and received supplemental information in all of these cases. In some cases, staff

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represents one REC. The voluntary REC market is not regulated in California. RECs are also commonly referred to as "renewable attributes" and "green tags."

53 Public Utilities Code Section 399.16, as enacted by SB 107, allows the CPUC to authorize the use of unbundled RECs once a tracking system is developed and other conditions are met.

54 See: http://www.cpuc.ca.gov/PUC/energy/Renewables/hot/TRECs.htm.

55 Green-e Energy, a program of the Center for Resource Solutions, is an independent consumer protection program for the sale of renewable energy in the voluntary retail market. www.green-e.org/.

adjusted the procurement claims downward to match the invoices; in cases where the supporting data matched the procurement claim, the claims were accepted.

Conversely, Energy Commission staff's comparison of generation and procurement found that in some cases the generation exceeded procurement claims by 5 percent or greater. In such cases, staff did not conduct further research to identify the source of the discrepancy, but rather was satisfied that the available generation data supported the specific purchase claim; the facility produced as much or more energy than was claimed by the utility for that year.

Possible explanations for generation discrepancies may include excess generation being sold to another utility, trader, or other entity. Also, the amount procured may reflect line losses such that more energy is generated than is delivered to the load. Additionally, verifying procurement claims with generation data is especially difficult for wind facilities. For example, individual wind turbines within a group of turbines that collectively comprise a wind facility are sometimes sold to new parties. This leads to difficulties locating owners of facilities who could provide generation data and can result in variances in record keeping by the retail sellers and the facility owners. Some wind facilities report to the EIA differently than they report the generation to the retail sellers. In some cases, multiple facilities report under one EIA identification number. Further, for all technologies, the comparison of generation and procurement requires an element of professional judgment. For example, the retail seller may report a project by one name, but sources of generation data may identify a project by a different name. Energy Commission staff must be able to determine which facilities use multiple names by cross-referencing various identification numbers.

While the Energy Commission recognizes the limitations of the Interim Tracking System, it is important to recognize that this verification report reflects staff's careful review of more than 545 specific purchases reported by 14 retail sellers and other reporting entities for the 2007 compliance year. The method and results have benefited from public input and are as accurate as possible at this time.

The data shown are snapshots for that year and do not include banking from excess procurement in previous years or earmarking of future renewable energy contracts that may be available for RPS compliance purposes in future years. Retail sellers provide this information to the CPUC in their RPS compliance reports.[56] Upon notice of availability of this verification report, reporting retail sellers must submit Verified Compliance Reports to the CPUC within 30 days.

As noted before, because the CPUC is responsible for establishing the RPS baseline formulas, implementing RPS targets, determining compliance, and imposing penalties for non-compliance, staff is not evaluating retail sellers' progress in meeting their RPS obligations in this report.

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56 Compliance report filings can be found on the CPUC's website for each retail seller at: http://www.cpuc.ca.gov/PUC/energy/Renewables/compliance.htm.

GLOSSARY

AB	— Assembly Bill
APT	— annual procurement target
CCA	— community choice aggregator
CPUC	— California Public Utilities Commission
DG	— distributed generation
e-Tag	— Electronic tag created under the policies of the North American Electric Reliability Corporation to document an energy interchange transaction
ERFP	— Existing Renewable Facilities Program
ESP	— electric service provider
FERC	— Federal Energy Regulatory Commission
IOU	— investor-owned utility
IPT	— interim procurement target
kWh	— kilowatt-hour
LSE	— load-serving entity
MJU	— multijurisdictional utility
MW	— megawatt
MWh	— megawatt hour
NERC	— North American Electric Reliability Corporation
PG&E	— Pacific Gas and Electric Company
PURPA	— Public Utilities Regulatory Policies Act
QF	— Qualifying Small Power Production Facility
REC	— Renewable Energy Credit/Certificate
REP	— Renewable Energy Program
RPS	— Renewables Portfolio Standard
SB	— Senate Bill
SCE	— Southern California Edison Company
SDG&E	— San Diego Gas & Electric Company
WECC	— Western Electricity Coordinating Council
WREGIS	— Western Renewable Energy Generation Information System

APPENDICES

This report contains two appendices: Appendix A is Retail Seller Initial Baseline Procurement Amounts and Appendix B is the Individual Retail Sellers' Modified RPS Track Forms.

Appendix A provides an overview of the Initial Baseline Procurement Amount (IBPA), the Incremental Procurement Target (IPT), and the Annual Procurement Target (APT) and demonstrates the calculations used to determine the baseline and target amounts for each type of retail seller. This appendix also includes the IBPA calculations for Sierra Pacific Power, Commerce Energy, and Coral Power because 2007 is the first year that these retail sellers reported RPS-eligible procurement, and these entities were not included in the *2006 Verification Report* IBPA calculations.

Appendix B includes modified versions of the CEC-RPS-Track Filings for PG&E, SCE, SDG&E, PacifiCorp, Sierra Pacific, and certain ESPs. Examples of the modifications include a column that was added to the tables to show procurement from generating facilities by other retail sellers, such as ESPs and POUs that reported to the SB 1305 Power Source Disclosure Program and voluntary market programs. The sum of the information reported to the Power Source Disclosure Program, voluntary market programs, and the procurement information reported to the Energy Commission in the CEC-RPS-Track forms was compared to generation totals reported to the Energy Commission and/or the EIA. Another example is that a column was added to indicate the source of the generation data used for this comparison.

The modified CEC-RPS-Track filings compare each retail sellers' procurement claim for each facility with the generation totals as available. For utility-certified facilities, an asterisk is listed with the RPS identification numbers indicating that it is a utility-certified facility. As provided in the *RPS Guidebook,* CEC-RPS-Track form claims are accepted as the reported generation for utility-certified facilities.

APPENDIX A
RPS Initial Baseline Procurement Amounts

The Initial Baseline Procurement Amount (IBPA), the Incremental Procurement Target (IPT), and the Annual Procurement Target (APT) identify the initial RPS procurement, the yearly RPS procurement increase, and the annual amount of RPS procurement required for a retail seller. In the cases where RPS-obligated entities have 2001 RPS procurement, the procurement from that year is used to calculate the baseline. In 2003 and subsequent years, excess RPS-eligible procurement in one year may be applied toward RPS targets in subsequent years under the CPUC's flexible compliance rules.

The following is a discussion of the IBPA, the IPT, and the APT and how they apply to MJUs and ESPs. Because Sierra Pacific Power, Commerce Energy, and Coral Power are reporting for the first time in this verification report, the IBPAs for these entities are also provided. A description of the IBPA calculations for IOUs is not included in this report because the IOU baselines were included in the *2006 Verification Report*. Additionally, the IBPAs for retail sellers that reported RPS-eligible procurement in earlier years are not included in this report but are calculated in Appendix A of the *2006 Verification Report*.

Initial Baseline Procurement Amount

The IBPA identifies the initial RPS procurement of a retail seller. The IBPA calculation depends on the retail seller.

Incremental Procurement Target

The incremental procurement target represents the amount of RPS-eligible procurement that the retail seller must purchase, in a given year, above the total amount the retail seller was required to procure in the prior year. A retail seller's IPT equals at least 1 percent of the previous year's total electric retail sales, up to 2009.

The IPT for 2004-2009 is calculated using the following equation:

IPT = 1 percent of the prior year's retail sales.[57]

The IPT for 2010 and beyond uses the current year's total electric retail sales and represents the additional generation needed to maintain 20 percent renewable procurement due to load growth.

57 In some cases, the IPT may be the lesser of (i) 1 percent of the prior year's retail sales, or (ii) the net short for achieving the 20 percent RPS target.

Annual Procurement Target

A retail seller's Annual Procurement Target (APT) is the amount of renewable generation the retail seller must procure in that year. Generally an APT is calculated using the following equation:

Current year APT = current year IPT + prior year's APT.[58]

For 2010 and beyond, all retail sellers have an APT of 20 percent.[59]

SMJUs

The 2003 IBPA for small IOUs is equivalent to the IBPA for large IOUs. The small IOUs, Mountain Utilities and Bear Valley Electric Service, did not make any RPS procurement claims for 2001 and 2003-2007 and, therefore, are not addressed in this *2007 Verification Report*.

The 2003 IBPA for multijurisdictional utilities is calculated by considering only their retail sales to California customers using the following equation:

2003 IBPA = (CA proportion of 2001 RPS eligible procurement[60] / 2001 total CA retail sales)

X 2003 total CA retail sales + 1 percent of 2001 total CA retail sales.

The small utilities' RPS obligations began in 2004, but the first year the small utilities have an APT is in 2007. The 2007 APT is calculated using the following equation:

2007 APT = 2003 IBPA + 2004 IPT + 2005 IPT + 2006 IPT + 2007 IPT.

58 A retail seller's first year APT is based on the IBPA. For first-year APT calculations, refer to the retail sections below.

59 Once effective, SB 2 (Simitian Chapter, Statutes of 2011 Extraordinary Session) will modify the procurement targets and require all load-serving entities to procure 33 percent renewable by 2020.

60 California proportion of MJU's 2001 system RPS eligible procurement is calculated by (2001 total CA retail sales/ 2001 total system sales) X 2001 system RPS eligible procurement. For the 2001 system RPS-eligible procurement, CPUC staff has determined that this should include facilities that are not currently RPS certified, but that the MJU believes use RPS-eligible technologies. This does not include facilities that are renewable but for which the MJU does not have contractual right to the associated RECs.

Following is the IBPA calculation for Sierra Pacific Power. PacifiCorp's IBPA was included in Appendix A of the *2006 Verification Report*.

Table A-1: MJU RPS Baseline Procurement Amount (kWh)

MJU	A 2001 Total System Retail Sales	B 2001 Total CA Retail Sales	C 2001 System RPS-Eligible Procurement	D 2003 Total CA Retail Sales	E 2003 Baseline Procurement Amount*
Sierra Pacific Power	8,741,134,000	505,625,907	818,596,000	521,494,370	53,893,539
* Calculation for Baseline Procurement Amount E = (((B/A)*C)/B*D) + (0.01*B).					

Source: RPS staff worked with Sierra Pacific Power on obtaining the correct amounts in accordance with the formula.

ESPs

The following explanation of the ESPs' IBPA is included because Commerce Energy and Coral Power are ESPs that have their IBPA reported for the first time in this verification report.

For ESPs, the IBPA formula depends on the ESP's first year of retail sales.

The 2005 IBPA for ESPs is calculated using the following equation:

(2001 CA RPS-eligible Procurement / 2001 total CA retail sales) X 2005 total CA retail sales.

For ESPs beginning retail sales in California between January 1, 2002, and December 31, 2005, the analogous formula is:

(CA RPS-eligible procurement in first year of CA retail sales / first-year CA retail sales) X 2005 total CA retail sales.

For ESPs beginning retail sales after December 31, 2005, the IPBA is equal to the first year's RPS-eligible procurement.

The first year of RPS compliance for the ESPs is 2006. The 2006 APT is calculated using the following equation:

2006 APT = 2005 IBPA + 2006 IPT.

Following are the IBPA calculations for Commerce Energy, Inc., and Coral Power, LLC. For ESPs included in the *2006 Verification Report*, their IBPA calculations are in Appendix B of the *2006 Verification Report*.

Table A-2: ESP RPS Baseline Procurement Amount (kWh)

ESPs (2001 or First Year Total CA Retail Sales)	A 2001 or First Year Total CA Retail Sales[1]	B 2001 or First Year CA RPS-Eligible Procurement	C 2005 Total CA Retail Sales[1]	D 2005 Baseline Procurement Amount*
Commerce Energy, Inc. (2001)	523,292,900	0	759,407,000	**0**
Coral Power LLC (2002)	153,364,600	0	232,386,000	**0**

* Calculation for Baseline Procurement Amount is D = (B/A)*C.

[1] Retail sellers were contacted and provided annual CA retail sales amounts when these amounts were not available in the CEC-RPS-Track forms, or in the CPUC RPS Compliance Reports.

Source: RPS staff analysis of information submitted by the ESPs listed in this table.

APPENDIX B: Individual Retail Sellers' Modified RPS Track Forms

For ease of viewing, staff has provided the template below with footnotes explaining the headers for each column title in the tables that follow. This template was used for every retail seller, with the exception of PacifiCorp and Sierra Pacific Power where staff compared RPS procurement claims with public disclosure statements made in other states. For PacifiCorp and Sierra Pacific Power, the column titled ***Procurement Reported to Power Source Disclosure Program (kWh)*** is titled "***RECs Allocated to Other States***." As necessary, there are some individualized footnotes found on specific tables.

Name of Retail Seller Year RPS Procurement Claim									
CEC RPS ID Number[1]	**Facility Name[2]**	**Fuel Type[3]**	**Annual Generation Procured (kWh)[4]**	**RPS Procurement Claims by Other Retail Sellers (kWh)[5]**	**Procurement Reported to Power Source Disclosure Program/ Voluntary Programs (kWh)[6]**	**Generation Data Used for Comparison With Procurement (kWh)[7]**	**Difference Between Generation and Procurement[8]**	**Generation Data Source[9]**	**Date RPS Certified[10]**

[1] The California Energy Commission assigns this RPS Certification identification number to the generating facility when it certifies the facility as RPS-eligible.
* RPS identification numbers that end in the suffix E and show No Data in the column "Generation Data Used for Comparison with Procurement" are utility-certified facilities with no independently reported generation. As stated on page 47 in the *RPS Eligibility Guidebook, Third Edition*, the retail seller is responsible for reporting the generation data for the facilities it certifies. This reporting requirement will be satisfied though the CEC-RPS-Track forms. Therefore, the asterisk indicates that the facility is utility-certified and that the procurement amount reported is accepted as reported on the RPS-Track form and no additional generation data is available for comparison.

[2] This is the facility name as listed on the California's Renewables Portfolio Standard (RPS) Eligible Facilities database, which can be found at: http://www.energy.ca.gov/portfolio/documents/LIST_RPS_CERT.PDF. In some cases the facility name may be different than what was reported on the RPS-Track form. Energy Commission staff has attempted to match the name of the facility to match the name in the Energy Commission RPS Certification Database.

[3] This is the fuel type as listed on the California's Renewables Portfolio Standard (RPS) Eligible Facilities database, which can be found at: http://www.energy.ca.gov/portfolio/documents/LIST_RPS_CERT.PDF In some cases, the fuel type may be different than what was reported on the RPS-Track form. Energy Commission staff has attempted to match the fuel type to match with what is listed in the Energy Commission RPS Certification Database.

[4] The procurement amount shown in this column is the amount reported by the retail seller to the Energy Commission in the CEC-RPS-Track form.

[5] The figures reported in this column are the total specific purchases reported on CEC-RPS-Track forms from other retail sellers.

[6] This column lists procurement claims from specific purchases from other retail sellers for the same facilities, if applicable. Claims were reported to the Energy Commission's Power Source Disclosure Program, which collects Annual Reports from retail sellers of electricity. Energy Commission staff compare the sources of power retailers claimed to the actual sources used for electricity that is consumed in California. Energy Commission staff received information on the Voluntary REC market. In cases where there is/was concern about double counting of RPS claims against voluntary REC claims, the voluntary REC claim amounts are listed. Please note that for PacifiCorp, the header includes "Procurement Reported to Other States for Power Source Disclosure Programs."

[7] The generation totals in this column are taken from various sources that collect facility-level generation information. These agencies are listed in the footnote under "Generation Data Sources." If multiple sources had generation data for the same facility, the highest generation total was used for comparison with the procurement claim(s).

[8] The percentages that appear in this column represent the differences between the data source with the highest generation amount and the annual procurement claim.

[9] Energy Commission staff the Energy Commission compares RPS procurement claims with generation data obtained from the various sources listed below: United States Electricity Information Association (EIA); Energy Commission's Electricity Analysis Office (EAO); Energy Commission's Public Interest Energy Research (PIER) Renewable Wind Program; Invoice or Supporting Documentation (Inv/SD); Energy Commission's Existing Renewable Funding Program (ERFP)

[10] This is the date that the facility's RPS certification became effective.

3Phases Energy Services RPS Procurement Claims Analysis

3Phases Energy Services
2007 RPS Procurement Claims

CEC RPS ID Number	Facility Name	Fuel Type	Annual Generation Procured (kWh)	RPS Procurement Claims by Other Retail Sellers (kWh)	Procurement Reported to Power Source Disclosure Program/ Voluntary Programs (kWh)	Generation Data Used for Comparison With Procurement (kWh)	Difference Between Generation and Procurement	Generation Data Source	Date RPS Certified
60107	Monterey Regional Waste Mgt Dist	Landfill Gas	4,747,000	12,227,869	10,963,000	27,506,999	-1.54%	EIA	12/17/2004
60023	Central Disposal Site LFG Power Plant Phase 3	Landfill Gas	2,419,000	0	0	11,880,001	391.11%	EIA	8/19/2004

APS Energy Services RPS Procurement Claims Analysis

APS Energy Services
2007 RPS Procurement Claims Analysis

CEC RPS ID Number	Facility Name	Fuel Type	Annual Generation Procured (kWh)	RPS Procurement Claims by Other Retail Sellers (kWh)	Procurement Reported to Power Source Disclosure Program/ Voluntary Programs (kWh)	Generation Data Used for Comparison With Procurement (kWh)	Difference Between Generation and Procurement	Generation Data Source	Date RPS Certified
60006	Calpine Geothermal Unit 16	Geothermal	19,000,000	389,413,454	30,422,000	457,938,000	4.35%	EAO	6/14/2004
60007	Calpine Geothermal Unit 17	Geothermal	19,000,000	401,854,723	0	451,593,000	7.30%	EAO	6/14/2004
60008	Calpine Geothermal Unit 18	Geothermal	43,000,000	193,196,912	0	419,719,000	77.70%	EAO	6/14/2004
60107	Monterey Regional Waste Mgt Dist	Landfill Gas	1,759,000	15,215,869	10,963,000	27,506,999	-1.54%	EIA	12/17/2004

Calpine Power America-CA RPS Procurement Claims Analysis

Calpine Power America-CA
2007 RPS Procurement Claims

CEC RPS ID Number	Facility Name	Fuel Type	Annual Generation Procured (kWh)	RPS Procurement Claims by Other Retail Sellers (kWh)	Procurement Reported to Power Source Disclosure Program/ Voluntary Programs (kWh)	Generation Data Used for Comparison With Procurement (kWh)	Difference Between Generation and Procurement	Generation Data Source	Date RPS Certified
60002	Calpine Geothermal Unit 5/6	Geothermal	8,375,000	549,219,129	0	667,070,000	19.63%	EAO	6/14/2004
60003	Calpine Geothermal Unit 7-8	Geothermal	5,180,000	567,388,051	0	615,359,000	7.47%	EAO	6/14/2004
60004	Calpine Geothermal Unit 12	Geothermal	16,860,000	405,736,378	0	427,675,000	1.20%	EAO	6/14/2004
60005	Calpine Geothermal Unit 13	Geothermal	11,416,000	457,890,637	0	472,754,000	0.73%	EAO	6/14/2004
60006	Calpine Geothermal Unit 16	Geothermal	28,930,000	408,384,524	30,422,000	457,938,000	-2.09%	EAO	6/14/2004
60007	Calpine Geothermal Unit 17	Geothermal	16,225,000	420,838,498	0	451,593,000	3.32%	EAO	6/14/2004
60008	Calpine Geothermal Unit 18	Geothermal	5,525,000	236,191,387	0	419,719,000	73.64%	EAO	6/14/2004
60009	Calpine Geothermal Unit 20	Geothermal	4,040,000	216,312,192	0	326,369,000	48.11%	EAO	6/14/2004
60010	Sonoma/Calpine Geyser	Geothermal	20,484,000	258,513,265	0	330,878,000	18.60%	EAO	6/14/2004
60026	Calpine Geothermal Unit 14	Geothermal	1,789,000	354,396,093	0	418,754,774	17.57%	RPS	6/14/2004

Commerce Energy, Inc., RPS Procurement Claims Analysis

Commerce Energy, Inc.
2007 RPS Procurement Claims

CEC RPS ID Number	Facility Name	Fuel Type	Annual Generation Procured (kWh)	RPS Procurement Claims by Other Retail Sellers (kWh)	Procurement Reported to Power Source Disclosure Program/ Voluntary Programs (kWh)	Generation Data Used for Comparison With Procurement (kWh)	Difference Between Generation and Procurement	Generation Data Source	Date RPS Certified
60004	Calpine Geothermal Unit 12	Geothermal	167,000	405,586,238	0	427,675,000	5.40%	EAO	6/14/2004
60005	Calpine Geothermal Unit 13	Geothermal	1,700,000	456,202,053	0	472,754,000	3.24%	EAO	6/14/2004
60007	Calpine Geothermal Unit 17	Geothermal	7,440,000	413,414,723	0	451,593,000	7.30%	EAO	6/14/2004
60008	Calpine Geothermal Unit 18	Geothermal	5,500,000	230,696,912	0	419,719,000	77.70%	EAO	6/14/2004

Constellation NewEnergy RPS Procurement Claims Analysis

Constellation NewEnergy
2007 RPS Procurement Claims

CEC RPS ID Number	Facility Name	Fuel Type	Annual Generation Procured (kWh)	RPS Procurement Claims by Other Retail Sellers (kWh)	Procurement Reported to Power Source Disclosure Program/ Voluntary Programs (kWh)	Generation Data Used for Comparison With Procurement (kWh)	Difference Between Generation and Procurement	Generation Data Source	Date RPS Certified
60003	Calpine Geothermal Unit 7-8	Geothermal	23,520,000	543,873,231	0	615,359,000	8.45%	EAO	6/14/2004
60004	Calpine Geothermal Unit 12	Geothermal	7,000,000	398,753,238	0	427,675,000	5.40%	EAO	6/14/2004
60007	Calpine Geothermal Unit 17	Geothermal	1,600,000	419,254,723	0	451,593,000	7.30%	EAO	6/14/2004
60009	Calpine Geothermal Unit 20	Geothermal	46,000,000	170,316,232	0	326,369,000	50.88%	EAO	6/14/2004
60604	Bottle Rock Power Plant	Geothermal	16,200,000	39,255,635	570,000	55,426,300	-1.07%	RPS	7/26/2007
60480	MM Lopez Energy LLC	Landfill Gas	7,320,000	41,201,920	0	48,610,000	0.18%	EIA	9/8/2005

Coral Power LLC RPS Procurement Claims Analysis

Coral Power LLC
2007 RPS Procurement Claims

CEC RPS ID Number	Facility Name	Fuel Type	Annual Generation Procured (kWh)	RPS Procurement Claims by Other Retail Sellers (kWh)	Procurement Reported to Power Source Disclosure Program/ Voluntary Programs (kWh)	Generation Data Used for Comparison With Procurement (kWh)	Difference Between Generation and Procurement	Generation Data Source	Date RPS Certified
60005	Calpine Geothermal Unit 13	Geothermal	4,900,000	453,002,053	0	472,754,000	3.24%	EAO	6/14/2004
60006	Calpine Geothermal Unit 16	Geothermal	5,000,000	403,413,454	30,422,000	457,938,000	4.35%	EAO	6/14/2004
60007	Calpine Geothermal Unit 17	Geothermal	700,000	420,154,723	0	451,593,000	7.30%	EAO	6/14/2004

Pilot Power Group, Inc., RPS Procurement Claims Analysis

Pilot Power Group, Inc.
2007 RPS Procurement Claims

CEC RPS ID Number	Facility Name	Fuel Type	Annual Generation Procured (kWh)	RPS Procurement Claims by Other Retail Sellers (kWh)	Procurement Reported to Power Source Disclosure/ Voluntary Programs (kWh)	Generation Data Used for Comparison With Procurement (kWh)	Difference Between Generation and Procurement	Generation Data Source	Date RPS Certified
60480	MM Lopez Energy LLC	Landfill Gas	41,201,920	7,320,000	0	48,610,000	0.18%	EIA	9/8/2005

Sempra Energy Solutions RPS Procurement Claims Analysis

Sempra Energy Solutions
2007 RPS Procurement Claims

CEC RPS ID Number	Facility Name	Fuel Type	Annual Generation Procured (kWh)	RPS Procurement Claims by Other Retail Sellers (kWh)	Procurement Reported to Power Source Disclosure/ Voluntary Programs (kWh)	Generation Data Used for Comparison With Procurement (kWh)	Difference Between Generation and Procurement	Generation Data Source	Date RPS Certified
60520	Angels Unit	Conduit Hydroelectric	4,660,630	0	0	4,661,001	0.01%	EIA	4/19/2006
60521	Murphys Unit	Conduit Hydroelectric	10,591,070	0	0	10,591,001	0.00%	EIA	4/19/2006
60009	Calpine Geothermal Unit 20	Geothermal	27,000,000	189,316,232	0	326,369,000	50.88%	EAO	6/14/2004
60010	Sonoma/Calpine Geyser	Geothermal	20,400,000	238,133,749	0	330,878,000	27.98%	EAO	6/14/2004
60025	Calpine Geothermal Unit 11	Geothermal	47,700,000	272,861,963	0	552,151,000	72.24%	EAO	6/14/2004
60026	Calpine Geothermal Unit 14	Geothermal	7,500,000	346,897,882	0	418,754,774	18.16%	RPS	6/14/2004
60601	El Dorado Powerhouse (Akin Powerhouse)	Small Hydroelectric	62,232,368	0	0	62,166,000	-0.11%	EIA	2/23/2007

Strategic Energy, LLC, RPS Procurement Claims Analysis

Strategic Energy, LLC
2007 RPS Procurement Claims

CEC RPS ID Number	Facility Name	Fuel Type	Annual Generation Procured (kWh)	RPS Procurement Claims by Other Retail Sellers (kWh)	Procurement Reported to Power Source Disclosure/ Voluntary Programs (kWh)	Generation Data Used for Comparison With Procurement (kWh)	Difference Between Generation and Procurement	Generation Data Source	Date RPS Certified
60002	Calpine Geothermal Unit 5/6	Geothermal	21,300,000	527,927,504	0	667,070,000	21.46%	EAO	6/14/2004
60003	Calpine Geothermal Unit 7-8	Geothermal	88,200,000	479,193,231	0	615,359,000	8.45%	EAO	6/14/2004
60004	Calpine Geothermal Unit 12	Geothermal	31,500,000	374,253,238	0	427,675,000	5.40%	EAO	6/14/2004
60005	Calpine Geothermal Unit 13	Geothermal	6,600,000	451,302,053	0	472,754,000	3.24%	EAO	6/14/2004
60007	Calpine Geothermal Unit 17	Geothermal	9,500,000	411,354,723	0	451,593,000	7.30%	EAO	6/14/2004
60008	Calpine Geothermal Unit 18	Geothermal	3,900,000	232,296,912	0	419,719,000	77.70%	EAO	6/14/2004
60009	Calpine Geothermal Unit 20	Geothermal	57,900,000	158,416,232	0	326,369,000	50.88%	EAO	6/14/2004
60010	Sonoma/Calpine Geyser	Geothermal	72,168,000	186,365,749	0	330,878,000	27.98%	EAO	6/14/2004
60025	Calpine Geothermal Unit 11	Geothermal	34,721,000	285,840,963	0	552,151,000	72.24%	EAO	6/14/2004
60604	Bottle Rock Power Plant	Geothermal	13,200,000	42,255,635	570,000	55,426,300	-1.07%	RPS	7/26/2007

PacifiCorp RPS Procurement Claims Analysis

PacifiCorp
2007 RPS Procurement Claims

CEC RPS ID Number	Facility Name	Fuel Type	Annual Generation Procured (kWh)	RPS Procurement Claims by Other Retail Sellers (kWh)	RECs Allocated to Other States (kWh)	Generation Data Used for Comparison With Procurement (kWh)	Difference Between Generation and Procurement	Generation Data Source	Date RPS Certified
60510	Dillard Cogeneration Facility	Biomass	2,790,524	0	0	188,422,000	6652.21%	EIA	6/12/2006
60509	Eagle Point	Conduit Hydroelectric	340,927	0	0	18,520,000	5332.24%	EIA	7/19/2006
60537	Copco 1	Conduit Hydroelectric	1,754,635	0	29,080,762	95,316,000	209.11%	EAO	11/1/2006
60538	Copco 2	Conduit Hydroelectric	2,206,346	0	36,567,371	119,854,000	209.11%	EAO	11/1/2006
60540	Iron Gate	Conduit Hydroelectric	2,194,417	0	36,369,982	119,206,001	209.11%	EIA	11/1/2006
60582*	Fountain Green	Conduit Hydroelectric	11,487	0	0	N/A	N/A	No Data	10/27/2006
60583	Granite	Conduit Hydroelectric	33,062	0	0	1,795,998	5332.23%	EIA	10/27/2006
60584*	Gunlock	Conduit Hydroelectric	14,285	0	0	N/A	N/A	No Data	10/27/2006
60588*	Sand Cove	Conduit Hydroelectric	13,015	0	0	N/A	N/A	No Data	10/27/2006
60593*	Veyo	Conduit Hydroelectric	13,199	0	0	N/A	N/A	No Data	10/27/2006
60594	Viva Naughton	Conduit Hydroelectric	12,518	0	0	6,162,000	49125.69%	EIA	10/27/2006
60779E*	Ralphs Ranch	Conduit Hydroelectric	253,200	0	0	N/A	N/A	No Data	4/27/2009
60780E*	Bogus Creek - Lower Cold Springs	Conduit Hydroelectric	774,880	0	0	N/A	N/A	No Data	4/27/2009
60781E*	Bogus Creek - Upper Cold Springs	Conduit Hydroelectric	372,720	0	0	N/A	N/A	No Data	4/27/2009
60782E*	Luckey, Paul	Conduit Hydroelectric	289,000	0	0	N/A	N/A	No Data	4/27/2009
60788	Draper Irrigation Company	Conduit Hydroelectric	605	0	0	33,000	5352.07%	Inv/SD	5/12/2009
60820	Blundell I	Geothermal	2,948,783	0	0	163,925,000	5459.07%	EIA	5/1/2009
60821	Blundell II	Geothermal	70,505	0	0	163,925,000	232401.32%	EIA	5/1/2009
60507	Clearwater 1	Small Hydroelectric	688,924	0	0	34,647,000	4929.15%	EIA	7/19/2006
60508	Clearwater 2	Small Hydroelectric	834,186	0	0	45,314,999	5332.24%	EIA	7/19/2006
60513	Fish Creek	Small Hydroelectric	657,408	0	0	35,712,001	5332.24%	EIA	7/19/2006
60514	Prospect 3	Small Hydroelectric	813,642	0	0	44,198,999	5332.24%	EIA	7/19/2006

60515	Slide Creek	Small Hydroelectric	1,504,370	0	0	81,720,999	5332.24%	EIA	7/19/2006
60516	Soda Springs	Small Hydroelectric	760,184	0	0	41,294,999	5332.24%	EIA	7/19/2006
60517	Wallowa Falls	Small Hydroelectric	113,434	0	0	6,162,000	5332.24%	EIA	7/19/2006
60522	Bend	Small Hydroelectric	52,704	0	0	2,862,999	5332.24%	EIA	10/19/2006
60523	Condit	Small Hydroelectric	1,553,595	0	0	84,395,000	5332.24%	EIA	10/19/2006
60524	Eastside	Small Hydroelectric	193,953	0	0	10,528,000	5328.12%	EIA	10/19/2006
60530	Prospect 1	Small Hydroelectric	271,140	0	0	14,729,001	5332.24%	EIA	10/19/2006
60531	Prospect 4	Small Hydroelectric	37,259	0	0	2,023,999	5332.24%	EIA	10/19/2006
60532*	Westside	Small Hydroelectric	7,179	0	0	N/A	N/A	No Data	10/19/2006
60539	Fall Creek	Small Hydroelectric	240,214	0	3,981,333	13,048,999	209.10%	EIA	11/1/2006
60578	Ashton	Small Hydroelectric	569,084	0	0	30,914,002	5332.24%	EIA	10/27/2006
60579	Big Fork	Small Hydroelectric	449,814	0	0	24,435,000	5332.24%	EIA	10/27/2006
60581	Cutler	Small Hydroelectric	819,110	0	0	44,309,000	5309.41%	EIA	10/27/2006
60585	Oneida	Small Hydroelectric	679,259	0	0	36,899,000	5332.24%	EIA	10/27/2006
60586*	Paris	Small Hydroelectric	35,068	0	0	N/A	N/A	No Data	10/27/2006
60587	Pioneer	Small Hydroelectric	225,818	0	0	12,263,000	5330.47%	EIA	10/27/2006
60589	Snake Creek	Small Hydroelectric	52,225	0	0	2,836,999	5332.24%	EIA	10/27/2006
60590	Soda	Small Hydroelectric	287,230	0	0	15,156,000	5176.62%	EIA	10/27/2006
60591	Stairs	Small Hydroelectric	76,193	0	0	4,139,001	5332.24%	EIA	10/27/2006
60592*	Upper Beaver	Small Hydroelectric	131,640	0	0	N/A	N/A	No Data	10/27/2006
60595	Weber	Small Hydroelectric	303,429	0	0	16,483,001	5332.24%	EIA	10/27/2006
60777	Slate Creek	Small Hydroelectric	3,907,145	0	1,642,332	5,421,000	-2.32%	EIA	4/27/2009
60778E*	Lake Siskiyou	Small Hydroelectric	11,675,326	0	0	N/A	N/A	No Data	4/27/2009
60791	Last Chance	Small Hydroelectric	55,336	0	0	3,006,000	5332.24%	EIA	5/12/2009
60792	Olmstead	Small Hydroelectric	371,191	0	0	20,164,001	5332.24%	EIA	5/12/2009
60561	Foote Creek 1	Wind	1,050,984	0	0	121,227,000	11434.62%	EIA	11/1/2006
60562	Leaning Juniper	Wind	5,328,409	0	0	290,452,000	5351.01%	EIA	11/1/2006
60563E*	Rock River 1	Wind	2,593,847	0	0	N/A	N/A	No Data	6/7/2007
60564	Wolverine Creek	Wind	2,741,650	0	0	148,933,000	5332.24%	EIA	6/7/2007
60729	Marengo	Wind	2,957,085	0	0	160,636,001	5332.24%	EIA	10/21/2008

* RPS identification numbers that end in the suffix E and show No Data in the column "Generation Data Used for Comparison with Procurement" are utility-certified facilities with no independently reported generation. As stated on page 47 in the *RPS Eligibility Guidebook, Third Edition*, the retail seller is responsible for reporting the generation data for the facilities it certifies. This reporting requirement will be satisfied through the CEC-RPS-Track forms. Therefore, the asterisk indicates that the facility is utility-certified and that the procurement amount reported is accepted as reported on the RPS-Track form.

Sierra Pacific Power RPS Procurement Claims Analysis

Sierra Pacific Power
2007 RPS Procurement Claims

CEC RPS ID Number	Facility Name	Fuel Type	Annual Generation Procured (kWh)	RPS Procurement Claims by Other Retail Sellers (kWh)	Procurement Reported to Power Source Disclosure Program/ RECs Allocated to Other States (kWh)	Generation Data Used for Comparison With Procurement (kWh)	Difference Between Generation and Procurement	Generation Data Source	Date RPS Certified
60570	SPI - Loyalton	Biomass	5,147,245	0	15,832,857	90,765,000	332.62%	EIA	4/11/2007
60704	Fleish Hydroelectric Plant	Conduit Hydroelectric	873,563	0	4,712,024	15,959,000	185.72%	EIA	2/26/2008
60705	Verdi Hydroelectric Plant	Conduit Hydroelectric	1,189,792	0	915,239	17,530,999	732.81%	EIA	2/26/2008
60706	Washoe Hydroelectric Plant	Conduit Hydroelectric	312,086	0	1,652,612	10,107,999	414.48%	EIA	2/26/2008
60664	Richard Burdette Geothermal Plant	Geothermal	9,016,510	0	34,894,709	34,691,000	-21.00%	EIA	2/20/2008
60666	Homestretch II	Geothermal	180,203	0	623,445	6,210,999	672.85%	EIA	2/19/2008
60667	Steamboat Hills	Geothermal	1,762,534	0	6,840,516	28,998,000	237.07%	EIA	2/19/2008
60668	Empire Farms	Geothermal	1,178,895	0	4,716,377	19,824,001	236.27%	EIA	2/19/2008
60669	Stillwater 1	Geothermal	3,118,968	0	11,747,984	49,525,001	233.12%	EIA	2/19/2008
60670	Steamboat 1	Geothermal	280,027	0	883,030	4,570,000	292.93%	EIA	2/19/2008
60671	Homestretch I	Geothermal	195,193	0	713,614	6,210,999	583.42%	EIA	2/19/2008
60672	Soda Lake 1 & 2	Geothermal	4,072,345	0	14,130,161	64,406,000	253.83%	EIA	2/19/2008
60673	Steamboat 1A	Geothermal	368,139	0	1,449,640	6,535,000	259.50%	EIA	2/19/2008
60674	Brady	Geothermal	5,817,079	0	17,091,156	91,375,000	298.87%	EIA	2/19/2008
60675	Steamboat 3	Geothermal	4,359,212	0	12,295,786	66,209,999	297.54%	EIA	2/19/2008
60676	Steamboat 2	Geothermal	2,996,875	0	13,478,020	47,572,000	188.75%	EIA	2/19/2008
60677	Beowawe Power, LLC	Geothermal	6,094,168	0	23,807,564	102,669,000	243.35%	EIA	2/19/2008
60765E*	Nevada Solar One	Solar Thermal Electric	1,870,166	0	3,435,920	N/A	N/A	No Data	2/26/2009

* RPS identification numbers that end in the suffix E and show No Data in the column "Generation Data Used for Comparison with Procurement" are utility-certified facilities with no independently reported generation. As stated on page 47 in the *RPS Eligibility Guidebook, Third Edition*, the retail seller is responsible for reporting the generation data for the facilities it certifies. This reporting requirement will be satisfied through the CEC-RPS-Track forms. Therefore, the asterisk indicates that the facility is utility-certified and that the procurement amount reported is accepted as reported on the RPS-Track form.

Pacific Gas and Electric RPS Procurement Claims Analysis

Pacific Gas and Electric
2006 RPS Procurement Claims

CEC RPS ID Number	Facility Name	Fuel Type	Annual Generation Procured (kWh)	RPS Procurement Claims by Other Retail Sellers (kWh)	Procurement Reported to Power Source Disclosure/ Voluntary Programs (kWh)	Generation Data Used for Comparison With Procurement (kWh)	Difference Between Generation and Procurement	Generatio n Data Source	Date RPS Certified
60073	Burney Forest Products	Biomass	208,662,168	0	0	216,702,259	3.85%	EIA	12/17/2004
60074	Collins Pine	Biomass	26,834,067	0	0	42,231,000	57.38%	EIA	12/17/2004
60076	DG Fairhaven Power Co	Biomass	101,524,051	0	0	111,805,000	10.13%	EIA	12/17/2004
60077	Honey Lake Power Company	Biomass	130,917,595	0	0	136,854,000	4.53%	EIA	12/17/2004
60078	Mendota Biomass Power Ltd	Biomass	167,978,380	0	0	167,912,976	-0.04%	ERFP	12/17/2004
60079	Ogden Power Pacific, Inc. (Burney)	Biomass	70,246,414	0	0	72,866,643	3.73%	ERFP	12/17/2004
60080	Ogden Power Pacific, Inc. (CS)	Biomass	123,402,641	0	0	123,221,747	-0.15%	ERFP	12/17/2004
60081	Ogden Power Pacific, Inc. (Mt Lsn)	Biomass	64,744,944	0	0	67,067,982	3.59%	ERFP	12/17/2004
60082	Ogden Power Pacific, Inc. (Oroville)	Biomass	116,913,995	0	0	118,928,000	1.72%	EIA	12/17/2004
60083	Pacific Lumber Co.	Biomass	97,021,467	0	0	163,477,629	68.50%	EIA	12/17/2004
60084	Rio Bravo Fresno	Biomass	150,191,450	0	0	147,846,000	-1.56%	EIA	12/17/2004
60085	Rio Bravo Rocklin	Biomass	137,973,217	0	0	137,371,000	-0.44%	EIA	12/17/2004
60086	SPI Anderson I	Biomass	4,527,217	0	0	30,719,002	578.54%	EIA	12/17/2004
60087	Sierra Pacific Industry (Burney)	Biomass	96,610,938	0	0	117,412,000	21.53%	EIA	12/17/2004
60088	SPI Lincoln	Biomass	74,505,533	0	0	111,760,000	50.00%	EIA	12/17/2004
60089	SPI Quincy	Biomass	135,329,467	0	0	186,918,554	38.12%	EIA	12/17/2004
60091	Thermal Energy Development Corp.	Biomass	129,055,222	0	0	129,055,222	0.00%	Inv	12/17/2004
60092	Wadham Energy Limited Partnership	Biomass	129,427,968	0	0	129,283,000	-0.11%	EIA	12/17/2004
60094	Wheelabrator Shasta Energy Co	Biomass	383,344,486	0	0	404,414,000	5.50%	EAO	12/17/2004
60095	Woodland Biomass Power, Ltd.	Biomass	155,456,567	0	0	148,224,000	-4.65%	EIA	12/17/2004
60272	Community Renewable Energy Service	Biomass	84,878,000	0	0	85,032,000	0.18%	EAO	12/17/2004
60273E*	Madera Power	Biomass	60,657,000	0	0	N/A	N/A	No Data	12/17/2004
60274	Sierra Power Corporation	Biomass	43,760,400	0	0	52,147,000	19.16%	EIA	12/17/2004
60275E*	Wheelabrator Co	Biomass	21,238,116	0	0	N/A	N/A	No Data	12/17/2004

60492	Big Valley Power	Biomass	36,240,175	0	0	37,320,000	2.98%	EAO	2/14/2006
60198	Calaveras Yuba Hydro #1	Conduit Hydroelectric	403,330	0	0	403,330	0.00%	Inv	12/17/2004
60199	Calaveras Yuba Hydro #2	Conduit Hydroelectric	372,599	0	0	372,599	0.00%	Inv	12/17/2004
60200	Calaveras Yuba Hydro #3	Conduit Hydroelectric	224,476	0	0	220,513	-1.77%	RPS	12/17/2004
60271	Etiwanda Small Conduit Hydroelectric Power Plant	Conduit Hydroelectric	122,629,000	0	0	127,704,000	4.14%	EAO	12/17/2004
60108	Monterey Regional Water	Digester Gas	255,141	0	0	8,798,999	3348.68%	EIA	12/17/2004
60190E*	City Of Watsonville	Digester Gas	83,102	0	0	N/A	N/A	No Data	12/17/2004
60191E*	Langerwerf Dairy	Digester Gas	446,648	0	0	N/A	N/A	No Data	12/17/2004
60192E*	Roy Sharp Jr.	Digester Gas	49,235	0	0	N/A	N/A	No Data	12/17/2004
60101E*	MWWTP Power Generation Station	Digester Gas	1,105,038	0	0	N/A	N/A	No Data	12/17/2004
60002	Calpine Geothermal Unit 5/6	Geothermal	490,287,901	58,939,603	0	667,070,000	21.46%	EAO	6/14/2004
60003	Calpine Geothermal Unit 7-8	Geothermal	418,464,689	148,928,542	0	615,359,000	8.45%	EAO	6/14/2004
60005	Calpine Geothermal Unit 13	Geothermal	443,863,037	14,039,016	0	472,754,000	3.24%	EAO	6/14/2004
60008	Calpine Geothermal Unit 18	Geothermal	127,200,861	108,996,051	0	419,719,000	77.70%	EAO	6/14/2004
60009	Calpine Geothermal Unit 20	Geothermal	58,228,092	158,088,140	0	326,369,000	50.88%	EAO	6/14/2004
60010	Sonoma/Calpine Geyser	Geothermal	2,099,890	256,433,859	0	330,878,000	27.98%	EAO	6/14/2004
60025	Calpine Geothermal Unit 11	Geothermal	71,615,590	248,946,373	0	552,151,000	72.24%	EAO	6/14/2004
60111	Amedee Geothermal Venture I	Geothermal	4,864,115	0	0	4,877,000	0.26%	EIA	12/17/2004
60112	Bear Canyon Power Plant	Geothermal	58,897,532	0	0	114,596,999	94.57%	EIA	12/17/2004
60114	West Ford Flat Power Plant	Geothermal	208,507,614	0	0	206,224,000	-1.10%	EIA	12/17/2004
60115	Aidlin Power Plant	Geothermal	70,839,525	0	0	146,494,000	106.80%	EAO	12/17/2004
60116E*	Geothermal Energy Partnership #2	Geothermal	74,823,711	0	0	N/A	N/A	No Data	
60117	Calistoga Power Plant	Geothermal	586,827,845	0	7,200,000	586,827,845	-1.21%	Inv	12/17/2004
60193E*	Wineagle Developers 1	Geothermal	2,543,485	0	0	N/A	N/A	No Data	12/17/2004
60604	Bottle Rock Power Plant	Geothermal	26,055,635	29,400,000	0	55,426,300	-0.05%	RPS	7/26/2007
60113E*	Calpine Geysers Company (KW #2)	Geothermal	57,013,335	0	0	N/A	N/A	No Data	
60096	Waste Management Renewable Energy	Landfill Gas	48,462,886	0	0	48,729,000	0.55%	EIA	12/17/2004
60098	Covanta Pacific Power (Salinas)	Landfill Gas	9,294,136	0	0	9,687,000	4.23%	EAO	12/17/2004
60102	Gas Recovery System- American Canyon	Landfill Gas	8,629,118	0	0	8,308,000	-3.72%	EIA	12/17/2004
60103	Gas Recovery System- Guadalupe	Landfill Gas	18,883,130	0	0	18,551,000	-1.76%	EIA	12/17/2004
60104	Gas Recovery System- Menlo Park	Landfill Gas	11,636,412	0	0	11,172,000	-3.99%	EIA	12/17/2004
60105	Gas Recovery System- Newby Island II	Landfill Gas	32,507,314	0	0	31,834,000	-2.07%	EAO	12/17/2004
60107	Monterey Regional Waste Mgt Dist	Landfill Gas	10,468,843	6,506,000	0	27,506,999	62.05%	EIA	12/17/2004
60100E*	Covanta Pacific Power (Stockton)	Landfill Gas	5,318,576	0	0	N/A	N/A	No Data	12/17/2004
60106E*	Gas Recovery System- Santa Cruz	Landfill Gas	5,528,858	0	0	N/A	N/A	No Data	12/17/2004
60110	Stanislaus Resource Recovery Facility	MSW, Combustion	140,437,202	0	0	140,437,202	0.00%	Inv	12/17/2004

60255E*	Robin Williams Solar Power Gen	Photovoltaic	668	0	0	N/A	N/A	No Data	12/17/2004
60634*	AT&T Park Solar Arrays	Photovoltaic	78,502	0	0	N/A	N/A	No Data	9/24/2007
60635*	San Francisco Service Center Solar Array 1	Photovoltaic	48,575	0	0	N/A	N/A	No Data	9/24/2007
60636*	San Francisco Service Center Solar Array 2	Photovoltaic	98,308	0	0	N/A	N/A	No Data	9/24/2007
60032	A.G. Wishon PH	Small Hydroelectric	23,153,837	0	0	23,153,000	0.00%	EIA	12/21/2004
60033	Alta PH	Small Hydroelectric	2,708,104	0	0	2,709,000	0.03%	EIA	12/21/2004
60034	Centerville PH	Small Hydroelectric	14,874,251	0	0	14,873,000	-0.01%	EIA	12/21/2004
60035	Chili Bar PH	Small Hydroelectric	20,487,680	0	0	20,489,000	0.01%	EAO	12/21/2004
60036*	Coal Canyon PH	Small Hydroelectric	-4,251	0	0	N/A	N/A	No Data	12/21/2004
60037	Coleman PH	Small Hydroelectric	60,136,942	0	0	60,148,000	0.02%	EAO	12/21/2004
60038	Cow Creek PH	Small Hydroelectric	8,459,415	0	0	8,461,000	0.02%	EAO	12/21/2004
60039*	Crane Valley PH	Small Hydroelectric	773,478	0	0	N/A	N/A	No Data	12/21/2004
60040	Deer Creek PH	Small Hydroelectric	21,322,610	0	0	21,325,000	0.01%	EAO	12/21/2004
60041	De Sabla PH	Small Hydroelectric	85,156,780	0	0	85,171,000	0.02%	EAO	12/21/2004
60042	Dutch Flat No. 1 PH	Small Hydroelectric	76,550,756	0	0	76,550,000	0.00%	EIA	12/21/2004
60043	Halsey PH	Small Hydroelectric	47,923,020	0	0	47,930,000	0.01%	EAO	12/21/2004
60044	Hamilton Branch PH	Small Hydroelectric	8,253,891	0	0	8,256,000	0.03%	EAO	12/21/2004
60045	Hat Creek No. 1 PH	Small Hydroelectric	35,786,520	0	0	35,791,000	0.01%	EAO	12/21/2004
60046	Hat Creek No. 2 PH	Small Hydroelectric	49,482,501	0	0	49,489,000	0.01%	EAO	12/21/2004
60047	Inskip PH	Small Hydroelectric	44,278,520	0	0	44,286,000	0.02%	EAO	12/21/2004
60048	Kern Canyon PH	Small Hydroelectric	44,641,634	0	0	44,649,000	0.02%	EAO	12/21/2004
60049	Kilarc PH	Small Hydroelectric	16,047,022	0	0	16,050,000	0.02%	EAO	12/21/2004
60050	Lime Saddle PH	Small Hydroelectric	5,286,662	0	0	5,287,000	0.01%	EAO	12/21/2004
60051	Merced Falls PH	Small Hydroelectric	11,386,058	0	0	11,388,000	0.02%	EAO	12/21/2004
60052	Narrows No. 1 PH	Small Hydroelectric	18,932,829	0	0	18,932,000	0.00%	EIA	12/21/2004
60053	Newcastle PH	Small Hydroelectric	24,251,071	0	0	24,258,000	0.03%	EAO	12/21/2004
60054	Phoenix PH	Small Hydroelectric	6,300,319	0	0	6,334,000	0.53%	EAO	12/21/2004
60055	Potter Valley PH	Small Hydroelectric	20,849,804	0	0	20,851,000	0.01%	EAO	12/21/2004
60057	San Joaquin No. 2 PH	Small Hydroelectric	2,649,638	0	0	2,650,000	0.01%	EIA	12/21/2004
60058	San Joaquin No. 3 PH	Small Hydroelectric	3,605,422	0	0	3,606,000	0.02%	EIA	12/21/2004
60059	South PH	Small Hydroelectric	48,570,174	0	0	48,577,000	0.01%	EAO	12/21/2004
60060	Spaulding No. 1 PH	Small Hydroelectric	27,902,448	0	0	27,902,000	0.00%	EIA	12/21/2004
60061	Spaulding No. 2 PH	Small Hydroelectric	9,127,828	0	0	14,722,000	61.29%	EAO	12/21/2004
60062	Spaulding No. 3 PH	Small Hydroelectric	24,432,803	0	0	24,435,000	0.01%	EIA	12/21/2004
60063	Spring Gap PH	Small Hydroelectric	24,073,217	0	0	24,079,000	0.02%	EAO	12/21/2004
60064	Toadtown PH	Small Hydroelectric	4,024,120	0	0	4,025,000	0.02%	EAO	12/21/2004
60065	Tule PH	Small Hydroelectric	9,681,802	0	0	9,685,000	0.03%	EAO	12/21/2004
60066	Volta No. 1 PH	Small Hydroelectric	44,539,444	0	0	44,547,000	0.02%	EAO	12/21/2004
60067	Volta No. 2 PH	Small Hydroelectric	470,275	0	0	470,000	-0.06%	EAO	12/21/2004

60068	West Point PH	Small Hydroelectric	60,183,782	0	0	60,200,000	0.03%	EAO	12/21/2004
60069	Wise No. 1 PH	Small Hydroelectric	66,230,240	0	0	72,971,000	10.18%	EIA	12/21/2004
60070	Wise No. 2 PH	Small Hydroelectric	6,740,893	0	0	72,971,000	982.51%	EIA	12/21/2004
60071	Tulloch Powerhouse	Small Hydroelectric	105,977,535	0	0	108,852,000	2.71%	EAO	12/27/2004
60072	Beardsley Powerhouse	Small Hydroelectric	26,946,098	0	0	105,904,918	293.03%	RPS	12/27/2004
60151E*	American Energy, Inc (Wolfsen)	Small Hydroelectric	1,099,943	0	0	N/A	N/A	No Data	12/17/2004
60152E*	Baker Station Associates L.P.	Small Hydroelectric	3,069,182	0	0	N/A	N/A	No Data	12/17/2004
60153	Calaveras City Water District	Small Hydroelectric	7,933,190	0	0	7,947,000	0.17%	EAO	12/17/2004
60154	El Dorado (Montgomery Crk)	Small Hydroelectric	5,745,720	0	0	5,854,001	1.88%	EIA	12/17/2004
60155	Far West Power Corporation	Small Hydroelectric	139,069	0	0	11,810,000	8392.19%	EAO	12/17/2004
60156	Friant Power Authority	Small Hydroelectric	35,312,609	0	0	36,147,263	2.36%	EAO	12/17/2004
60157	Haypress Hydroelectric (LWR)	Small Hydroelectric	5,147,854	0	0	10,788,000	109.56%	EAO	12/17/2004
60158	Haypress Hydroelectric (MDDL)	Small Hydroelectric	5,449,557	0	0	10,788,000	97.96%	EAO	12/17/2004
60159	Humboldt Bay Muni Water Dist	Small Hydroelectric	4,651,332	0	0	4,570,000	-1.75%	EAO	12/17/2004
60160	Hypower, Inc.	Small Hydroelectric	19,282,100	0	0	19,662,998	1.98%	EIA	12/17/2004
60161	Indian Vly Hydro Elec Ptrn.	Small Hydroelectric	9,989,873	0	0	9,891,000	-0.99%	EAO	12/17/2004
60162	Kern Hydro Partners (Olcese)	Small Hydroelectric	21,869,689	0	0	22,439,000	2.60%	EIA	12/17/2004
60163	Madera Chowchilla	Small Hydroelectric	2,797,618	0	0	5,081,000	81.62%	EAO	12/17/2004
60164	Malacha Hydro Ltd. Partnership	Small Hydroelectric	21,790,894	0	0	22,345,000	2.54%	EIA	12/17/2004
60165	Mega Renewables (Bidwell Ditch)	Small Hydroelectric	12,327,405	0	0	12,799,000	3.83%	EIA	12/17/2004
60166	Mega Renewables (Hatchet Crk)	Small Hydroelectric	12,197,194	0	0	14,397,000	18.04%	EAO	12/17/2004
60167	Mega Renewables (Roaring Crk)	Small Hydroelectric	3,839,628	0	0	5,274,000	37.36%	EAO	12/17/2004
60168	Merced ID (Parker)	Small Hydroelectric	6,456,736	0	0	63,123,999	877.65%	EIA	12/17/2004
60169	Monterey County Water Res Agency	Small Hydroelectric	14,322,868	0	0	14,927,000	4.22%	EAO	12/17/2004
60170	Nelson Creek Power Inc.	Small Hydroelectric	1,609,667	0	0	1,647,000	2.32%	EAO	12/17/2004
60171	Nevada Power Authority	Small Hydroelectric	8,099,596	0	0	9,090,000	12.23%	EAO	12/17/2004
60172	NID/Combie South	Small Hydroelectric	2,699,862	0	0	2,680,001	-0.74%	EIA	12/17/2004
60173	NID/Scotts Flat Hydro	Small Hydroelectric	3,200,503	0	0	3,190,999	-0.30%	EIA	12/17/2004
60175	Olsen Power Partners, Inc.	Small Hydroelectric	4,514,825	0	0	4,652,000	3.04%	EIA	12/17/2004
60176	Rock Creek Limited Partnership	Small Hydroelectric	919,148	0	0	909,000	-1.10%	EIA	12/17/2004
60177	Snow Mountain Hydro LLC (Burney)	Small Hydroelectric	2,471,544	0	0	2,451,000	-0.83%	EAO	12/17/2004
60178	Snow Mountain Hydro LLC (Cove)	Small Hydroelectric	9,861,065	0	0	10,021,000	1.62%	EAO	12/17/2004
60179	Lost Creek 1	Small Hydroelectric	6,123,821	0	0	6,358,000	3.82%	EIA	12/17/2004
60180E*	Lost Creek 2	Small Hydroelectric	2,766,524	0	0	N/A	N/A	No Data	12/17/2004
60181	Snow Mntn Hydro LLC (Ponderosa)	Small Hydroelectric	815,663	0	0	827,000	1.39%	EAO	12/17/2004
60182	Sonoma County Water Agency	Small Hydroelectric	12,220,199	0	0	11,793,000	-3.50%	EIA	12/17/2004
60183	South S J ID (Frankenheimer)	Small Hydroelectric	15,540,694	0	0	15,458,000	-0.53%	EAO	12/17/2004
60184	South San Joaquin ID (Woodward)	Small Hydroelectric	5,788,095	0	0	5,564,000	-3.87%	EAO	12/17/2004

60185	STS Hydropower Ltd. (Kanaka)	Small Hydroelectric	650,309	0	0	658,000	1.18%	EAO	12/17/2004
60186	STS Hydropower Ltd. (Kekawaka)	Small Hydroelectric	5,263,219	0	0	5,438,000	3.32%	EAO	12/17/2004
60187	TKO Power (South Fork Bear)	Small Hydroelectric	2,338,267	0	0	2,437,002	4.22%	EIA	12/17/2004
60188	Tri-Dam Authority (Sandbar)	Small Hydroelectric	49,912,341	0	0	57,452,000	15.11%	EIA	12/17/2004
60189E*	Yuba County Water	Small Hydroelectric	1,424,618	0	0	N/A	N/A	No Data	12/17/2004
60194E*	Arbuckle Mountain Hydro	Small Hydroelectric	69,729	0	0	N/A	N/A	No Data	12/17/2004
60195E*	Bailey Creek Ranch	Small Hydroelectric	1,033,531	0	0	N/A	N/A	No Data	12/17/2004
60197E*	Browns Valley Irrigation Dist.	Small Hydroelectric	2,111,885	0	0	N/A	N/A	No Data	12/17/2004
60201E*	Canal Creek Power Plant (Reta)	Small Hydroelectric	528,380	0	0	N/A	N/A	No Data	12/17/2004
60202E*	Charcoal Ravine	Small Hydroelectric	742	0	0	N/A	N/A	No Data	12/17/2004
60206E*	Digger Creek Ranch	Small Hydroelectric	2,933,190	0	0	N/A	N/A	No Data	12/17/2004
60207E*	E J M McFadden	Small Hydroelectric	280,438	0	0	N/A	N/A	No Data	12/17/2004
60208E*	Eagle Hydro	Small Hydroelectric	1,389,519	0	0	N/A	N/A	No Data	12/17/2004
60209E*	Eric and Debbie Watternburg	Small Hydroelectric	107,078	0	0	N/A	N/A	No Data	12/17/2004
60210E*	Fairfield Power Plant	Small Hydroelectric	923,074	0	0	N/A	N/A	No Data	12/17/2004
60211E*	Five Bears Hydroelectric	Small Hydroelectric	108,866	0	0	N/A	N/A	No Data	12/17/2004
60214E*	Vecino Vineyards LLC	Small Hydroelectric	196,119	0	0	N/A	N/A	No Data	12/17/2004
60215E*	Hat Creek Hereford Ranch	Small Hydroelectric	322,990	0	0	N/A	N/A	No Data	12/17/2004
60216E*	Henwood Associates	Small Hydroelectric	1,699,863	0	822,219	N/A	N/A	No Data	12/17/2004
60217E*	Jackson Valley Irrigation Dist	Small Hydroelectric	273,565	0	0	N/A	N/A	No Data	12/17/2004
60218E*	James B. Peter	Small Hydroelectric	81,080	0	0	N/A	N/A	No Data	12/17/2004
60219E*	James Crane Hydro	Small Hydroelectric	7,827	0	0	N/A	N/A	No Data	12/17/2004
60220E*	John Neerhout Jr.	Small Hydroelectric	10,959	0	0	N/A	N/A	No Data	12/17/2004
60221E*	Kings River Hydro Co.	Small Hydroelectric	1,834,070	0	0	N/A	N/A	No Data	12/17/2004
60222E*	Lassen Station Hydro	Small Hydroelectric	2,251,480	0	0	N/A	N/A	No Data	12/17/2004
60223E*	Lofton Ranch	Small Hydroelectric	1,076,431	0	0	N/A	N/A	No Data	12/17/2004
60224E*	Madera Canal (1174 + 84)	Small Hydroelectric	1,100,687	0	0	N/A	N/A	No Data	12/17/2004
60225E*	Madera Canal (1923)	Small Hydroelectric	678,099	0	0	N/A	N/A	No Data	12/17/2004
60226E*	Madera Canal Station 1302	Small Hydroelectric	637,700	0	0	N/A	N/A	No Data	12/17/2004
60227E*	Mega Hydro #1 (Clover Creek)	Small Hydroelectric	3,053,751	0	0	N/A	N/A	No Data	12/17/2004
60228E*	Mega Hydro (Goose Valley Ranch)	Small Hydroelectric	392,469	0	0	N/A	N/A	No Data	12/17/2004
60229E*	Mega Renewables (Silver Springs)	Small Hydroelectric	2,101,925	0	0	N/A	N/A	No Data	12/17/2004
60230E*	Mill & Sulphur Creek	Small Hydroelectric	1,355,419	0	0	N/A	N/A	No Data	12/17/2004
60231E*	NID/Combie North	Small Hydroelectric	504,450	0	0	N/A	N/A	No Data	12/17/2004
60232	Orange Cove Irrigation District - Friant Fishwater Release Hydroelectric Facility	Small Hydroelectric	3,049,877	0	0	2,995,255	-1.79%	RPS	12/17/2004
60234E*	Placer County Water Agency	Small Hydroelectric	3,461,424	0	0	N/A	N/A	No Data	12/17/2004
60235E*	Robert W. Lee	Small Hydroelectric	36,726	0	0	N/A	N/A	No Data	12/17/2004
60236E*	Rock Creek Water District	Small Hydroelectric	1,078,871	0	0	N/A	N/A	No Data	12/17/2004
60237E*	Santa Clara Valley Water Dist.	Small Hydroelectric	530,473	0	0	N/A	N/A	No Data	12/17/2004

60238	Schaads Hydro	Small Hydroelectric	520,455	0	0	494,779	-4.93%	RPS	12/17/2004
60239E*	Shamrock Utilities (Cedar Flat)	Small Hydroelectric	930,093	0	0	N/A	N/A	No Data	12/17/2004
60240E*	Shamrock Utilities (Clover Leaf)	Small Hydroelectric	525,132	0	0	N/A	N/A	No Data	12/17/2004
60242	Sierra Energy	Small Hydroelectric	106,947	0	0	1,388,000	1197.84%	EAO	12/17/2004
60243E*	South Sutter Water	Small Hydroelectric	442,566	0	0	N/A	N/A	No Data	12/17/2004
60244E*	Steve & Bonnie Tetrick	Small Hydroelectric	268,557	0	0	N/A	N/A	No Data	12/17/2004
60246E*	Sutter's Mill	Small Hydroelectric	773,809	0	0	N/A	N/A	No Data	12/17/2004
60247E*	Swiss America	Small Hydroelectric	301,254	0	0	N/A	N/A	No Data	12/17/2004
60249E*	Tom Benninghoven	Small Hydroelectric	71,888	0	0	N/A	N/A	No Data	12/17/2004
60250E*	Water Wheel Ranch	Small Hydroelectric	2,152,359	0	0	N/A	N/A	No Data	12/17/2004
60251E*	Youth with a Mission/Spgs Of Lv Wat	Small Hydroelectric	107,162	0	0	N/A	N/A	No Data	12/17/2004
60252E*	Yuba County Water Agency	Small Hydroelectric	1,092,281	0	0	N/A	N/A	No Data	12/17/2004
60263	MID (McSwain)	Small Hydroelectric	27,329,083	0	0	220,371,000	706.36%	EIA	12/17/2004
60264	NID (Dutch Flat #2)	Small Hydroelectric	42,871,172	0	0	50,981,999	18.92%	EIA	12/17/2004
60265	NID (Rollins)	Small Hydroelectric	53,570,681	0	0	55,766,001	4.10%	EIA	12/17/2004
60266	Kelly Ridge Powerhouse	Small Hydroelectric	68,783,640	0	0	70,247,000	2.13%	EIA	12/17/2004
60267	Sly Creek Powerhouse	Small Hydroelectric	12,051,367	0	0	17,551,001	45.63%	EIA	12/17/2004
60268	PCWA (French Meadows)	Small Hydroelectric	31,501,970	0	0	32,111,999	1.94%	EIA	12/17/2004
60269	PCWA (Oxbow)	Small Hydroelectric	15,684,013	0	0	15,864,000	1.15%	EIA	12/17/2004
60270	SID (Monticello)	Small Hydroelectric	45,393,871	0	0	44,686,002	-1.56%	EIA	12/17/2004
60276	Oak Flat PH	Small Hydroelectric	5,331,094	0	0	5,332,000	0.02%	EIA	1/13/2005
60502	Three Forks Water Power Project	Small Hydroelectric	5,826,610	0	0	6,008,000	3.11%	EAO	3/7/2006
60030	Diablo Winds	Wind	66,203,450	0	0	64,756,000	-2.19%	EIA	11/19/2004
60118	Altamont Midway Ltd	Wind	16,896,220	0	0	16,664,998	-1.37%	EIA	12/17/2004
60119E*	Altamont Power LLC (3-4)	Wind	8,924,735	0	0	N/A	N/A	No Data	12/17/2004
60120E*	Altamont Power LLC (4-4)	Wind	41,119,789	0	0	N/A	N/A	No Data	12/17/2004
60122E*	Altamont Power LLC (6-4)	Wind	41,167,357	0	0	N/A	N/A	No Data	12/17/2004
60124	Buena Vista Wind Farm	Wind	83,954,000	0	0	106,888,295	27.32%	RPS	12/17/2004
60125E*	Green Ridge Power LLC (10MW)	Wind	35,562,993	0	0	N/A	N/A	No Data	12/17/2004
60126E*	Green Ridge Power LLC (100MW-A)	Wind	96,888,761	0	0	N/A	N/A	No Data	12/17/2004
60127E*	Green Ridge Power LLC (100MW-B)	Wind	40,662,831	0	0	N/A	N/A	No Data	12/17/2004
60128E*	Green Ridge Power LLC (100MW-C)	Wind	19,437,383	0	0	N/A	N/A	No Data	12/17/2004
60129E*	Green Ridge Power LLC (100MW-D)	Wind	23,203,471	0	0	N/A	N/A	No Data	12/17/2004
60130E*	Green Ridge Power LLC (110MW)	Wind	183,528,133	0	0	N/A	N/A	No Data	12/17/2004
60131E*	Green Ridge Power LLC (23.8MW)	Wind	32,460,292	0	0	N/A	N/A	No Data	12/17/2004
60133E*	Green Ridge Power LLC (5.9MW)	Wind	12,297,080	0	0	N/A	N/A	No Data	12/17/2004
60134E*	Green Ridge Power LLC (70MW-A)	Wind	30,356,075	0	0	N/A	N/A	No Data	12/17/2004

60135E*	Green Ridge Power LLC (70MW-B)	Wind	29,165,012	0	0	N/A	N/A	No Data	12/17/2004
60136E*	Green Ridge Power LLC (70MW-C)	Wind	48,903,780	0	0	N/A	N/A	No Data	12/17/2004
60137E*	Green Ridge Power LLC (70MW-D)	Wind	2,365,825	0	0	N/A	N/A	No Data	12/17/2004
60138E*	Green Ridge Power LLC (70MW)	Wind	120,422,930	0	0	N/A	N/A	No Data	12/17/2004
60139	International Turbine Research	Wind	26,990,657	0	0	26,709,209	-1.04%	EIA	12/17/2004
60140	Northwind Energy Inc.	Wind	19,043,082	0	0	19,043,082	0.00%	Inv	12/17/2004
60141E*	Patterson Pass Windfarm LLC	Wind	45,085,267	0	0	N/A	N/A	No Data	12/17/2004
60142E*	Seawest Energy (Altech)	Wind	3,926,478	0	0	N/A	N/A	No Data	12/17/2004
60143E*	Seawest Energy (CWES)	Wind	1,022,418	0	0	N/A	N/A	No Data	12/17/2004
60144E*	Seawest Energy (Seawest)	Wind	41,845	0	0	N/A	N/A	No Data	12/17/2004
60145E*	Seawest Energy (Taxvest)	Wind	7,281,072	0	0	N/A	N/A	No Data	12/17/2004
60146E*	Seawest Energy (Viking)	Wind	1,062,868	0	0	N/A	N/A	No Data	12/17/2004
60147E*	Seawest Energy (Western)	Wind	613,732	0	0	N/A	N/A	No Data	12/17/2004
60148E*	Tres Vaqueros Wind Farms, LLC	Wind	31,201,846	0	0	N/A	N/A	No Data	12/17/2004
60257E*	Donald R. Chenoweth	Wind	15,929	0	0	N/A	N/A	No Data	12/17/2004
60488	Shiloh I Wind Project	Wind	257,394,000	0	245,314,000	502,658,000	-0.01%	RPS	11/16/2005
60602	Klondike Wind Power III	Wind	17,301,430	0	0	89,171,000	415.40%	EIA	7/5/2007
60132E*	Green Ridge Power LLC (30MW)	Wind	38,664,733	0	0	N/A	N/A	No Data	12/17/2004

* RPS identification numbers that end in the suffix E and show nothing in the column "Generation Data Used for Comparison with Procurement" are utility-certified facilities with no independently reported generation. As stated on page 47 in the *RPS Eligibility Guidebook, Third Edition*, the retail seller is responsible for reporting the generation data for the facilities it certifies. This reporting requirement will be satisfied through the CEC-RPS-Track forms. Therefore, the asterisk indicates that the facility is utility-certified and that the procurement amount reported is accepted as reported on the RPS-Track form.

Southern California Edison RPS Procurement Claims Analysis

Southern California Edison
2007 RPS Procurement Claims

CEC RPS ID Number	Facility Name	Fuel Type	Annual Generation Procured (kWh)	RPS Procurement Claims by Other Retail Sellers (kWh)	Procurement Reported to Power Source Disclosure/ Voluntary Programs (kWh)	Generation Data Used for Comparison With Procurement (kWh)	Difference Between Generation and Procurement	Generation Data Source	Date RPS Certified
60286	Colmac Energy Mecca Plant[1]	Biomass	365,692,000	0	0	365,692,000	0.00%	EAO	3/30/2005
60330E*	Calleguas Municipal Water District - Conejo	Conduit Hydroelectric	449,641	0	0	N/A	N/A	No Data	4/5/2005
60333E*	Walnut Valley Water District - Unit 1	Conduit Hydroelectric	818,524	0	0	N/A	N/A	No Data	4/5/2005
60335	Calleguas MWD - Unit 2 (East Portal)	Conduit Hydroelectric	6,825,609	0	0	6,826,000	0.01%	EAO	4/5/2005
60340E*	Daniel M. Bates, et al.	Conduit Hydroelectric	401,135	0	0	N/A	N/A	No Data	4/5/2005
60341E*	Richard Moss	Conduit Hydroelectric	159,335	0	0	N/A	N/A	No Data	4/5/2005
60343E*	Three Valleys MWD (Fulton Road)	Conduit Hydroelectric	1,086,863	0	0	N/A	N/A	No Data	4/5/2005
60344E*	Three Valleys MWD (Miramar)	Conduit Hydroelectric	856,712	0	0	N/A	N/A	No Data	4/5/2005
60345E*	Three Valleys MWD (Williams)	Conduit Hydroelectric	1,726,083	0	0	N/A	N/A	No Data	4/5/2005
60347E*	Picay Hydroelectric Project	Conduit Hydroelectric	538,777	0	0	N/A	N/A	No Data	4/5/2005
60348E*	Calleguas MWD - Unit 3 (Santa Rosa)	Conduit Hydroelectric	1,152,664	0	0	N/A	N/A	No Data	4/5/2005
60349E*	City Of Santa Ana	Conduit Hydroelectric	49,256	0	0	N/A	N/A	No Data	4/5/2005
60350E*	Goleta Water District	Conduit Hydroelectric	494,609	0	0	N/A	N/A	No Data	4/5/2005
60354E*	San Bernardino MWD (Unit 3)	Conduit Hydroelectric	210,252	0	0	N/A	N/A	No Data	4/5/2005
60355E*	American Energy, Inc. (Fullerton Hydro)	Conduit Hydroelectric	1,134,118	0	0	N/A	N/A	No Data	4/5/2005
60356E*	Monte Vista Water District	Conduit Hydroelectric	1,733,933	0	0	N/A	N/A	No Data	4/5/2005
60357E*	Ontario Hydroelectric Station (Station No. 1)	Conduit Hydroelectric	190,465	0	0	N/A	N/A	No Data	4/5/2005
60358	Calleguas MWD (Springville Hydro)	Conduit Hydroelectric	2,570,668	0	0	2,571,000	0.01%	EAO	4/5/2005
60618	Sepulveda Canyon Power Plant[6]	Conduit Hydroelectric	41,502,000	0	0	41,502,001	0.00%	EIA	3/30/2005
60619	Lake Perris Power Plant[6]	Conduit Hydroelectric	26,859,893	0	0	26,860,000	0.00%	EAO	3/30/2005
60620	Venice Power Plant[6]	Conduit Hydroelectric	22,457,831	0	0	22,459,000	0.01%	EAO	3/30/2005
60621	Temescal Power Plant[6]	Conduit Hydroelectric	10,534,974	0	0	10,535,000	0.00%	EIA	3/30/2005
60622	Corona Power Plant[6]	Conduit Hydroelectric	10,243,210	0	0	10,243,000	0.00%	EIA	3/30/2005
60623	Rio Hondo Power Plant[6]	Conduit Hydroelectric	8,563,159	0	0	8,563,000	0.00%	EIA	3/30/2005
60624	Coyote Creek Power Plant[6]	Conduit Hydroelectric	6,478,122	0	0	6,478,001	0.00%	EIA	3/30/2005
60625	Red Mountain Power Plant[6]	Conduit Hydroelectric	14,927,352	0	0	14,927,001	0.00%	EIA	3/30/2005
60626	Valley View Power Plant[6]	Conduit Hydroelectric	1,284,065	0	0	1,284,002	0.00%	EIA	3/30/2005

61020	Mammoth Pool Fish Water Generator	Conduit Hydroelectric	1,623,199	0	0	259,100,000	15862.31%	EIA	3/9/2010
60279E*	Royal Farms	Digester Gas	109,087	0	0	N/A	N/A	No Data	4/5/2005
60294	Orange County Sanitation District	Digester Gas	343,332	0	0	57,928,000	16772.30%	EAO	4/5/2005
60295E*	Inland Empire Utilities Agency	Digester Gas	607,567	0	0	N/A	N/A	No Data	4/5/2005
60002	Calpine Geothermal Unit 5/6	Geothermal	37,631,228	511,596,276	0	667,070,000	21.46%	EAO	6/14/2004
60003	Calpine Geothermal Unit 7-8	Geothermal	37,203,362	530,189,869	0	615,359,000	8.45%	EAO	6/14/2004
60004	Calpine Geothermal Unit 12	Geothermal	367,069,378	38,683,860	0	427,675,000	5.40%	EAO	6/14/2004
60005	Calpine Geothermal Unit 13	Geothermal	827,600	457,074,453	0	472,754,000	3.24%	EAO	6/14/2004
60006	Calpine Geothermal Unit 16	Geothermal	384,384,524	24,028,930	30,422,000	457,938,000	4.35%	EAO	6/14/2004
60007	Calpine Geothermal Unit 17	Geothermal	382,598,498	38,256,225	0	451,593,000	7.30%	EAO	6/14/2004
60008	Calpine Geothermal Unit 18	Geothermal	56,590,526	179,606,386	0	419,719,000	77.70%	EAO	6/14/2004
60009	Calpine Geothermal Unit 20	Geothermal	27,184,100	189,132,132	0	326,369,000	50.88%	EAO	6/14/2004
60010	Sonoma/Calpine Geyser	Geothermal	163,845,375	94,688,374	0	330,878,000	27.98%	EAO	6/14/2004
60025	Calpine Geothermal Unit 11	Geothermal	166,525,373	154,036,590	0	552,151,000	72.24%	EAO	6/14/2004
60026	Calpine Geothermal Unit 14	Geothermal	346,896,093	7,501,789	0	418,754,774	18.16%	RPS	6/14/2004
60305	Heber Geothermal Company	Geothermal	305,143,000	0	0	346,826,000	13.66%	EAO	4/5/2005
60306	Mammoth Pacific L. P. (MP1)	Geothermal	32,989,500	0	0	39,012,000	18.26%	EIA	4/5/2005
60307	Del Ranch, Ltd., (Niland #2)	Geothermal	340,924,000	0	0	328,732,000	-3.58%	EIA	4/5/2005
60308	Vulcan/BN Geothermal	Geothermal	295,060,000	0	0	283,953,000	-3.76%	EAO	4/5/2005
60309	Coso Finance Partners (Navy I)	Geothermal	633,958,272	0	0	635,005,000	0.17%	EAO	4/5/2005
60310	Elmore Ltd.	Geothermal	327,481,000	0	0	314,565,000	-3.94%	EAO	4/5/2005
60311	Ormesa Geothermal I	Geothermal	279,704,651	0	0	436,986,000	56.23%	Inv	4/5/2005
60312	Ormesa Geothermal II	Geothermal	133,030,198	0	0	145,582,000	9.44%	EAO	4/5/2005
	Geo East Mesa[5]	Geothermal	40,893,151	0	0	N/A	N/A	No Data	
60313E*	Caithness Dixie Valley, LLC.	Geothermal	478,175,508	0	0	N/A	N/A	No Data	4/5/2005
60315	Mammoth Pacific L. P. I (Ples)	Geothermal	98,044,656	0	0	138,758,000	41.53%	EAO	4/5/2005
60316	Second Imperial Geothermal Co.	Geothermal	294,246,000	0	0	320,105,000	8.79%	EAO	4/5/2005
60317	Salton Sea Power Generation L.P. #3	Geothermal	392,547,000	0	0	379,893,000	-3.22%	EIA	4/5/2005
60318	Leathers L. P.	Geothermal	349,044,000	0	0	349,044,000	0.00%	EIA	4/5/2005
60319	Mammoth Pacific L P II (MP2)	Geothermal	89,787,540	0	0	138,013,000	53.71%	EAO	4/5/2005
60320	Salton Sea Power Generation L.P. #2	Geothermal	135,568,000	0	0	135,568,000	0.00%	Inv	4/5/2005
60321	Coso Power Developers	Geothermal	590,770,484	0	0	591,035,000	0.04%	EAO	4/5/2005
60322	Coso Energy Developers	Geothermal	498,873,052	0	0	497,480,000	-0.28%	EAO	4/5/2005
60323	Salton Sea Power Generation L.P. #1	Geothermal	78,356,000	0	0	78,400,000	0.06%	EIA	4/5/2005
60324	Salton Sea IV	Geothermal	348,743,000	0	0	348,743,000	0.00%	Inv	4/5/2005
60278	Generating Resource Recovery Partners, LP	Landfill Gas	15,614,328	0	0	15,983,000	2.36%	EAO	4/5/2005
60280	L.A. Co. Sanitation Dist CSD 2610	Landfill Gas	6,937,279	0	0	408,423,000	5787.37%	EAO	4/5/2005

60281	Brea I	Landfill Gas	18,518,053	0	16,408,400	36,296,000	3.92%	EAO	9/18/2006
60283	Pacific Energy Operating Group, L.P.	Landfill Gas	15,995,191	0	0	15,660,000	-2.10%	EIA	4/5/2005
60288	L.A. Co. Sanitation Dist Spadra	Landfill Gas	53,619,264	0	0	53,712,000	0.17%	EIA	4/5/2005
60289	L.A. Co. Sanitation Dist #C-2850	Landfill Gas	28,590,828	0	0	28,824,000	0.82%	EIA	4/5/2005
60290	L.A. Co. Sanitation Dist	Landfill Gas	395,214,910	0	0	408,423,000	3.34%	EAO	4/5/2005
60292	WM Energy Solutions, Inc. (El Sobrante)	Landfill Gas	12,832,963	0	0	12,355,000	-3.72%	EAO	4/5/2005
60293	WM Energy Solutions, Inc. (Simi Valley)	Landfill Gas	10,042,488	0	0	9,895,000	-1.47%	EAO	4/5/2005
60298	MM Tajiguas Energy LLC	Landfill Gas	19,795,325	0	0	19,797,000	0.01%	EAO	4/5/2005
60301E*	MM Woodville Energy LLC	Landfill Gas	2,500,166	0	0	N/A	N/A	No Data	4/5/2005
60304E*	Ventura Regional Sanitation District	Landfill Gas	22,121	0	0	N/A	N/A	No Data	4/5/2005
60326E*	Hi Head Hydro Incorporated	Small Hydroelectric	2,296,002	0	0	N/A	N/A	No Data	4/5/2005
60328E*	Henwood Associates	Small Hydroelectric	846,278	0	0	N/A	N/A	No Data	4/5/2005
60329E*	Desert Power Company	Small Hydroelectric	1,286,583	0	0	N/A	N/A	No Data	4/5/2005
60332E*	San Bernardino MWD	Small Hydroelectric	437,998	0	0	N/A	N/A	No Data	4/5/2005
60334E*	Irvine Ranch Water District	Small Hydroelectric	285,904	0	0	N/A	N/A	No Data	4/5/2005
60336	Whitewater	Small Hydroelectric	480,522	0	0	480,001	-0.11%	EIA	4/5/2005
60337E*	Snow Creek	Small Hydroelectric	296,804	0	0	N/A	N/A	No Data	4/5/2005
60338	Success Dam Power Project	Small Hydroelectric	292,664	0	0	292,664	0.00%	Inv	4/5/2005
60342	Isabella Hydroelectric Project	Small Hydroelectric	9,221,808	0	0	9,222,000	0.00%	EAO	4/5/2005
60346	Kaweah River Power Authority	Small Hydroelectric	15,970,968	0	0	24,578,000	53.89%	EAO	4/5/2005
60351	United Water Conservation District	Small Hydroelectric	1,424,484	0	0	1,411,001	-0.95%	EIA	4/5/2005
60352E*	Deep Springs College	Small Hydroelectric	14,874	0	0	N/A	N/A	No Data	4/5/2005
60353E*	Camrosa County Water District	Small Hydroelectric	5,470	0	0	N/A	N/A	No Data	4/5/2005
60444	Bishop Creek No. 2	Small Hydroelectric	13,926,310	0	0	13,881,001	-0.33%	EIA	5/11/2005
60446	Bishop Creek No. 3	Small Hydroelectric	19,219,557	0	0	19,156,000	-0.33%	EIA	5/11/2005
60447	Bishop Creek No. 4	Small Hydroelectric	18,920,113	0	0	18,771,000	-0.79%	EAO	5/11/2005
60448	Bishop Creek No. 5	Small Hydroelectric	10,170,098	0	0	10,164,000	-0.06%	EIA	5/11/2005
60449	Bishop Creek No. 6	Small Hydroelectric	7,217,514	0	0	7,213,000	-0.06%	EAO	5/11/2005
60450	Borel	Small Hydroelectric	38,359,777	0	0	38,305,000	-0.14%	EAO	5/11/2005
60451	Fontana	Small Hydroelectric	4,578,575	0	0	4,578,000	-0.01%	EAO	5/11/2005
60452	Kaweah No. 1	Small Hydroelectric	6,649,743	0	0	6,603,001	-0.70%	EIA	5/11/2005
60453	Kaweah No. 2	Small Hydroelectric	7,048,610	0	0	7,017,000	-0.45%	EIA	5/11/2005
60454	Kaweah No. 3	Small Hydroelectric	15,216,352	0	0	15,192,000	-0.16%	EAO	5/11/2005
60455	Kern River No. 1	Small Hydroelectric	102,738,830	0	0	102,739,000	0.00%	EIA	5/11/2005
60456	Lundy	Small Hydroelectric	4,417,611	0	0	4,417,000	-0.01%	EAO	5/11/2005
60457	Lytle Creek	Small Hydroelectric	2,510,001	0	0	2,510,000	0.00%	EAO	5/11/2005
60458	Mill Creek No. 1	Small Hydroelectric	3,103,810	0	0	3,102,000	-0.06%	EAO	5/11/2005
60459	Mill Creek No. 3	Small Hydroelectric	6,869,649	0	0	6,866,001	-0.05%	EIA	5/11/2005
60460	Ontario No. 1	Small Hydroelectric	2,089,224	0	0	2,074,000	-0.73%	EAO	5/11/2005

60461	Ontario No. 2	Small Hydroelectric	415,780	0	0	415,000	-0.19%	EAO	5/11/2005
60462	Poole Plant	Small Hydroelectric	18,696,204	0	0	18,694,000	-0.01%	EIA	5/11/2005
60463	Portal Power Plant	Small Hydroelectric	39,340,747	0	0	39,228,000	-0.29%	EIA	5/11/2005
60464	Rush Creek	Small Hydroelectric	22,599,808	0	0	22,599,001	0.00%	EIA	5/11/2005
60465	Santa Ana No. 1	Small Hydroelectric	2,238,504	0	0	4,434,000	98.08%	EAO	5/11/2005
60466	Santa Ana No. 3	Small Hydroelectric	2,410,591	0	0	2,363,001	-1.97%	EIA	5/11/2005
60467	Sierra	Small Hydroelectric	1,397,956	0	0	1,388,000	-0.71%	EAO	5/11/2005
60468	Tule River	Small Hydroelectric	10,543,475	0	0	20,179,000	91.39%	EAO	5/11/2005
60359	Sunray Energy, Inc.	Solar Thermal Electric	38,186,946	0	0	38,186,946	0.00%	ERFP	4/5/2005
60360	Luz Solar Partners Ltd. III	Solar Thermal Electric	65,353,536	0	0	65,366,000	0.02%	EIA	4/5/2005
60361	Luz Solar Partners Ltd. IV	Solar Thermal Electric	65,829,528	0	0	65,829,798	0.00%	ERFP	4/5/2005
60362	Luz Solar Partners Ltd. V	Solar Thermal Electric	66,053,052	0	0	66,053,052	0.00%	ERFP	4/5/2005
60363	Luz Solar Partners Ltd. VI	Solar Thermal Electric	71,068,644	0	0	71,068,644	0.00%	ERFP	4/5/2005
60364	Luz Solar Partners Ltd. VII	Solar Thermal Electric	66,238,308	0	0	66,238,308	0.00%	ERFP	4/5/2005
60365	Luz Solar Partners Ltd. VIII	Solar Thermal Electric	146,574,648	0	0	146,574,648	0.00%	ERFP	4/5/2005
60366	Luz Solar Partners Ltd. IX	Solar Thermal Electric	147,560,184	0	0	147,071,000	-0.33%	EIA	4/5/2005
60028	Sirocco	Wind	11,769,608	0	0	11,862,518	0.79%	RPS	10/10/2004
60029	Cellc 7.5 MW Tehachapi Wind Project	Wind	28,307,368	0	0	28,421,153	0.40%	RPS	10/10/2004
60284 & 60285[3]	Mountain View I & II [2]	Wind	206,353,850	0	110,000,000[4]	200,999,001	**-36.46%**	EIA	4/5/2005
60291E*	Calwind Resources Inc. II	Wind	55,311,552	0	0	N/A	N/A	No Data	4/5/2005
60368	FPL Energy Cabazon Wind, LLC	Wind	52,706,448	0	0	54,134,000	2.71%	EIA	4/5/2005
60369E*	Mogul Energy Partnership I	Wind	13,206,408	0	0	N/A	N/A	No Data	4/5/2005
60370E*	Mesa Wind Developers	Wind	57,196,674	0	0	N/A	N/A	No Data	4/5/2005
60371E*	San Gorgonio Wind Farms Inc I	Wind	8,403,750	0	0	N/A	N/A	No Data	4/5/2005
60372	Boxcar I Power Purchase Contract Trust	Wind	10,171,976	0	0	31,046,000	205.21%	EIA	4/5/2005
60373E*	Windsong Wind Park	Wind	5,769,486	0	0	N/A	N/A	No Data	4/5/2005
60374E*	Zephyr Park, Ltd	Wind	9,679,288	0	0	N/A	N/A	No Data	4/5/2005
60375E*	Ridgetop Energy, LLC (I)	Wind	165,109,248	0	0	N/A	N/A	No Data	4/5/2005
60377E*	Windpower Partners 1993 L.P.	Wind	15,753,829	0	0	N/A	N/A	No Data	4/5/2005
60378E*	EUI Management PH Inc.	Wind	41,413,488	0	0	N/A	N/A	No Data	4/5/2005
60379E*	Windpower Partners 1993 L.P.	Wind	7,101,221	0	0	N/A	N/A	No Data	4/5/2005
60380	Tehachapi Power Purchase Contract Trust	Wind	130,901,184	0	0	130,901,184	0.00%	Inv	4/5/2005
60381E*	Enron Wind Systems, LLC (VG # I)	Wind	11,751,016	0	0	N/A	N/A	No Data	4/5/2005
60382E*	Enron Wind Systems, LLC (VG #2)	Wind	7,255,864	0	0	N/A	N/A	No Data	4/5/2005
60383E*	Enron Wind Systems, LLC (VG #3)	Wind	6,613,688	0	0	N/A	N/A	No Data	4/5/2005
60384E*	Enron Wind Systems, LLC (VG #4)	Wind	6,465,696	0	0	N/A	N/A	No Data	4/5/2005
60385E*	Zond Wind Systems Partners, Series 85-A	Wind	16,246,048	0	0	N/A	N/A	No Data	4/5/2005

60386E*	Zond Wind Systems Partners, Series 85-B	Wind	23,345,488	0	0	N/A	N/A	No Data	4/5/2005
60387	Section 20 Trust	Wind	43,068,180	0	0	43,068,180	0.00%	Inv	4/5/2005
60388E*	NAWP Inc. [East Winds Proj]	Wind	7,732,596	0	0	N/A	N/A	No Data	4/5/2005
60389E*	Difwind Farms Limited V	Wind	12,369,648	0	0	N/A	N/A	No Data	4/5/2005
60391	Edom Hills Project 1, LLC	Wind	3,395,504	0	0	3,396,000	0.01%	EIA	4/5/2005
60392E*	Cameron Ridge LLC (III)	Wind	149,672,808	0	0	N/A	N/A	No Data	4/5/2005
60393	San Gorgonio Westwinds II, LLC	Wind	30,372,444	0	0	133,253,000	338.73%	EIA	4/5/2005
60394E*	Calwind Resources Inc.	Wind	16,600,016	0	0	N/A	N/A	No Data	4/5/2005
60395E*	Windridge Incorporated	Wind	1,689,400	0	0	N/A	N/A	No Data	4/5/2005
60396	Energy Development & Const. Corp.	Wind	34,550,148	0	0	34,865,000	0.91%	EAO	4/5/2005
60397	Desert Winds I Ppc Trust	Wind	91,704,960	0	0	91,704,960	0.00%	Inv	4/5/2005
60398	Section 7 Trust	Wind	60,348,147	0	0	69,992,000	15.98%	EAO	4/5/2005
60399E*	Sky River Partnership (Wilderness I)	Wind	94,550,706	0	0	N/A	N/A	No Data	4/5/2005
60400E*	Sky River Partnership (Wilderness II)	Wind	51,926,562	0	0	N/A	N/A	No Data	4/5/2005
60401E*	Sky River Partnership (Wilderness III)	Wind	52,197,930	0	0	N/A	N/A	No Data	4/5/2005
60402	Section 16-29 Trust (Altech III)	Wind	79,387,344	0	0	79,387,344	0.00%	Inv	4/5/2005
60403E*	Difwind Partners	Wind	28,672,056	0	0	N/A	N/A	No Data	4/5/2005
60404E*	CTV Power Purchase Contract Trust	Wind	35,081,208	0	0	N/A	N/A	No Data	4/5/2005
60405	Alta Mesa Pwr. Purch. Contract Trust	Wind	69,656,040	0	0	84,651,998	21.53%	EIA	4/5/2005
60406E*	Cameron Ridge LLC (IV)	Wind	39,821,424	0	0	N/A	N/A	No Data	4/5/2005
60407	Ridgetop Energy, LLC (II)	Wind	90,913,428	0	0	90,913,428	0.00%	Inv	4/5/2005
60408E*	Section 22 Trust [San Jacinto]	Wind	42,025,800	0	0	N/A	N/A	No Data	4/5/2005
60409E*	Dutch Energy	Wind	20,913,846	0	0	N/A	N/A	No Data	4/5/2005
60410E*	Westwind Trust	Wind	30,742,752	0	0	N/A	N/A	No Data	4/5/2005
60411	Boxcar II Power Purchase Contract Trst	Wind	20,947,256	0	0	31,046,000	48.21%	EIA	4/5/2005
60412E*	BNY Western Trust Company	Wind	3,749,904	0	0	N/A	N/A	No Data	4/5/2005
60413E*	Victory Garden Phase IV Partner - 6102	Wind	16,083,568	0	0	N/A	N/A	No Data	4/5/2005
60414E*	Victory Garden Phase IV Partner - 6103	Wind	12,573,160	0	0	N/A	N/A	No Data	4/5/2005
60415E*	Victory Garden Phase IV Partner - 6104	Wind	15,573,368	0	0	N/A	N/A	No Data	4/5/2005
60416E*	Caithness 251 Wind, LLC (Monolith X)	Wind	10,427,104	0	0	N/A	N/A	No Data	4/5/2005
60417E*	Caithness 251 Wind, LLC (Monolith XI)	Wind	9,149,320	0	0	N/A	N/A	No Data	4/5/2005
60418E*	Caithness 251 Wind, LLC (Monolith XII)	Wind	11,305,896	0	0	N/A	N/A	No Data	4/5/2005

60419E*	Caithness 251 Wind, LLC (Monolith XIII)	Wind	8,642,672	0	0	N/A	N/A	No Data	4/5/2005
60420E*	Enron Wind Systems, LLC (Northwind)	Wind	7,435,896	0	0	N/A	N/A	No Data	4/5/2005
60421E*	Painted Hills Wind Developers	Wind	37,055,960	0	0	N/A	N/A	No Data	4/5/2005
60422	Desert Winds II Pwr Purch Trst	Wind	236,035,440	0	0	233,505,001	-1.07%	EIA	4/5/2005
60423	Desert Wind III PPC Trust	Wind	88,877,340	0	0	175,914,000	97.93%	EIA	4/5/2005
60424E*	Windpower Partners 1993, L.P.	Wind	6,602,962	0	0	N/A	N/A	No Data	4/5/2005
60426E*	S & L Ranch	Wind	1,154	0	0	N/A	N/A	No Data	4/5/2005
60428E*	BNY Western Trust Company	Wind	27,998,136	0	0	N/A	N/A	No Data	4/5/2005
60429	Oak Creek Energy Systems Inc.	Wind	90,375,568	0	0	105,224,000	16.43%	EIA	4/5/2005

[1]A portion of the procurement claim from Colmac Energy Mecca Plant was determined ineligible for the RPS because the facility exceeded its fossil fuel use limit. Only 316,323,580 kWh of the total procurement claim are eligible for the RPS.

[2]Procurement from Mountain View I & II facilities is ineligible to count towards the California RPS because the procurement from these facilities was for energy only.

[3]SCE's procurement claim from Mountain View I facility, EIA number 55719, is 132,570,843 kWh and the amount generated by this facility reported by EIA is129,134,000 kWh. SCE's procurement claim from the Mountain View II facility, EIA number 55720, is 73,783,007 kWh and the amount generated by this facility reported by EIA is 71,865,001 kWh.

[4]Total KWh of Mountain View I and II RECs sold by Green-e® Energy on the voluntary market.

[5]Procurement from the Geo East Mesa facility is ineligible to count towards the California RPS because Geo East Mesa was not certified as an RPS eligible facility.

[6]In April 2011, SCE submitted a revised CEC-RPS-Track form breaking out the procurement claim from Metropolitan Water District between the nine individually certified RPS-eligible facilities for which this claim was comprised.

* RPS identification numbers that end in the suffix E and show nothing in the column "Generation Data Used for Comparison with Procurement" are utility-certified facilities with no independently reported generation. As stated on page 47 in the *RPS Eligibility Guidebook, Third Edition*, the retail seller is responsible for reporting the generation data for the facilities it certifies. This reporting requirement will be satisfied through the CEC-RPS-Track forms. Therefore, the asterisk indicates that the facility is utility-certified and that the procurement amount reported is accepted as reported on the RPS-Track form.

SDG&E RPS Procurement Claims Analysis

SDG&E
2007 RPS Procurement Claims

CEC RPS ID Number	Facility Name	Fuel Type	Annual Generation Procured (kWh)	RPS Procurement Claims by Other Retail Sellers (kWh)	Procurement Reported to Power Source Disclosure/ Voluntary Programs (kWh)	Generation Data Used for Comparison With Procurement (kWh)	Difference Between Generation and Procurement	Generation Data Source	Date RPS Certified
60431	AES Delano, Inc.	Biomass	217,966,957	0	0	217,981,000	0.01%	EAO	3/18/2005
60438	Badger Filtration Plant	Conduit Hydroelectric	1,499,839	0	0	1,499,839	0.00%	Inv	4/26/2005
60439	Bear Valley Hydro	Conduit Hydroelectric	968,258	0	0	967,999	-0.03%	EIA	4/26/2005
60470	Rancho Penasquitos Pressure Control Hydroelectric Facility	Conduit Hydroelectric	17,519,022	0	0	34,944,000	99.46%	EAO	5/24/2005
60441E*	Olivenhain Municipal Water District	Conduit Hydroelectric	691,906	0	0	N/A	N/A	No Data	4/26/2005
60442E*	San Francisco Peak Hydro Plant	Conduit Hydroelectric	622,694	0	0	N/A	N/A	No Data	4/26/2005
60551	Gas Utilization Facility	Digester Gas	18,465,671	0	0	39,893,829	116.04%	EIA	2/22/2007
60433	Otay Landfill 1	Landfill Gas	12,832,392	0	0	26,623,000	107.47%	EAO	4/26/2005
60434	Otay Landfill 2	Landfill Gas	12,853,323	0	0	26,623,000	107.13%	EAO	4/26/2005
60435	Gas Recovery Systems- San Marcos	Landfill Gas	9,295,243	0	0	9,295,243	0.00%	RPS	4/26/2005
60436	Sycamore Landfill	Landfill Gas	6,822,527	0	0	20,704,000	203.47%	EAO	4/26/2005
60481	MM San Diego Energy (Miramar)	Landfill Gas	29,407,327	0	0	46,783,000	59.09%	EAO	9/8/2005
60482	MM San Diego Energy (North City)	Landfill Gas	6,026,313	0	0	29,657,000	392.13%	EAO	9/8/2005
60485	Gas Recovery Systems - Coyote Canyon	Landfill Gas	18,174,680	0	0	18,159,900	-0.08%	RPS	11/2/2005
60486	Sycamore Canyon 2	Landfill Gas	13,888,728	0	0	20,704,000	49.07%	EAO	11/2/2005
60550	Jamacha Landfill	Landfill Gas	201,900	0	0	201,900	0.00%	Inv/SD	3/1/2007
60552	MM Prima Deshecha Energy, LLC	Landfill Gas	23,993,025	0	0	23,997,497	0.02%	RPS	2/28/2007
60571	Covanta Otay 3 Company	Landfill Gas	19,688,550	0	0	21,959,957	11.54%	RPS	3/21/2007
60430	Mountain View III	Wind	76,564,513	0	0	194,025,000	153.41%	EAO	3/18/2005
60432	Kumeyaay Wind Energy Facility	Wind	148,007,211	0	0	148,010,028	0.00%	RPS	4/15/2005
60443	FPL Energy Green Power Wind LLC	Wind	26,642,518	0	0	28,043,000	5.26%	EIA	5/3/2005
60445	Phoenix Wind	Wind	6,606,818	0	0	6,651,810	0.68%	EIA	5/24/2005
60489	Oasis Power Partners, LLC	Wind	212,037,673	0	0	212,013,000	-0.01%	RPS	2/6/2006

* RPS identification numbers that end in the suffix E and show No Data in the column "Generation Data Used for Comparison with Procurement" are utility-certified facilities with no independently reported generation. As stated on page 47 in the *RPS Eligibility Guidebook, Third Edition*, the retail seller is responsible for reporting the generation data for the facilities it certifies. This reporting requirement will be satisfied through the CEC-RPS-Track forms. Therefore, the asterisk indicates that the facility is utility-certified and that the procurement amount reported is accepted as reported on the RPS-Track form.