

**STATE OF CALIFORNIA**

**STATE ENERGY RESOURCES  
CONSERVATION AND DEVELOPMENT COMMISSION**

**RESOLUTION ADOPTING  
RENEWABLES PORTFOLIO STANDARD 2014-2016 VERIFICATION RESULTS  
REPORT FOR SAN FRANCISCO PUBLIC UTILITIES COMMISSION - HETCH  
HETCHY POWER FOR COMPLIANCE PERIOD 2**

**WHEREAS**, Public Utilities Code Section 399.25(b) requires the California Energy Commission to design and implement an accounting system to verify compliance with California's Renewables Portfolio Standard (RPS) by retail sellers and local publicly owned electric utilities (POUs), to ensure that electricity generated by an eligible renewable energy resource is counted only once for the purpose of meeting the renewables portfolio standard of this state or any other state, and for verifying retail product claims in this state or any other state; and

**WHEREAS**, the California Energy Commission, in collaboration with the California Public Utilities Commission, has adopted regulations and guidelines addressing its responsibilities under Public Utilities Code Section 399.25(b) as well as other provisions of the law governing California's RPS, the *Enforcement Procedures for the Renewables Portfolio Standard Local Publicly Owned Electric Utilities* (RPS POU Regulations) and the *Renewables Portfolio Standard Eligibility Guidebook, Ninth Edition (Revised)* (RPS Eligibility Guidebook), respectively; and

**WHEREAS**, in furtherance of Public Utilities Code Section 399.25(b) the California Energy Commission prepares a Renewables Portfolio Standard Verification Results report on its findings on the amount of eligible renewable energy procured each compliance period by POUs subject to California's RPS; and

**WHEREAS**, the Renewables Portfolio Standard Verification Results reports apply the statutory requirements as specified in Public Utilities Code Section 399.11, et seq., the RPS POU Regulations, RPS Eligibility Guidebook, and the Energy Commission staff *Renewables Portfolio Standard Verification Methodology Report, Second Edition*, in determining the amount of renewable energy procurement that qualifies toward each POU's California RPS procurement requirements; and

**WHEREAS**, California Energy Commission staff have prepared the Compliance Period 2 (2014-2016) verification report for San Francisco Public Utilities Commission (SFPUC) – Hetch Hetchy Power, entitled the *California Energy Commission Staff Draft Report Renewables Portfolio Standard Verification Results San Francisco Public Utilities Commission – Hetch Hetchy Power Compliance Period 2 (2014-2016)* (hereinafter the *Staff Draft Report Renewables Portfolio Standard Verification Results*); and

**WHEREAS**, California Energy Commissions staff have determined that SFPUC – Hetch Hetchy Power meets the requirements in Public Utilities Code Section 399.30(j) and RPS POU Regulations Section 3207(a)(7) to qualify for alternative annual procurement targets as detailed in the *Staff Draft Report Renewables Portfolio Standard Verification Results*; and

**WHEREAS**, the scope of the *Staff Draft Report Renewables Portfolio Standard Verification Results* includes RPS procurement verification findings for SFPUC - Hetch Hetchy Power; and

**WHEREAS**, the *California Energy Commission Staff Draft Report Renewables Portfolio Standard Verification Results* for SFPUC - Hetch Hetchy Power address the following items:

- The POU’s procurement targets.
- The amount of eligible renewable energy retired, and the amount applied to meet the RPS procurement requirements, both shown by Portfolio Content Category (PCC) and other classifications.
- Any deficits in meeting the RPS procurement requirements.
- Any optional compliance measures being applied by the POU.
- A summary of the POU’s excess procurement and historic carryover, if any, including any prior balance, the amount accumulated and used in each of the compliance years, and the ending balances; and

**WHEREAS**, the California Energy Commission has considered the *Staff Draft Report Renewables Portfolio Standard Verification Results* for SFPUC - Hetch Hetchy Power, including any minor non-substantive changes noted during the July 8, 2020 Business Meeting, and accepts and approves the *Staff Draft Report Renewables Portfolio Standard Verification Results* for SFPUC - Hetch Hetchy Power, with any noted minor, non-substantive changes; and

**THEREFORE BE IT RESOLVED**, the California Energy Commission hereby adopts the *Staff Draft Report Renewables Portfolio Standard Verification Results* for SFPUC - Hetch Hetchy Power, and authorizes the Executive Director, or his designee, to finalize the report as an Energy Commission adopted report, including making any necessary minor typographical edits, and distribute and post on the California Energy Commission website as necessary.

#### CERTIFICATION

The undersigned Secretariat to the California Energy Commission does hereby certify that the foregoing is a full, true, and correct copy of a RESOLUTION duly and regularly adopted at a meeting of the California Energy Commission held on July 8, 2020.

AYE:

NAY:

ABSENT:

ABSTAIN:

---

Cody Goldthrite,  
Secretariat

**DOCKETED**

<b>Docket Number:</b>	18-RPS-02
<b>Project Title:</b>	Renewables Portfolio Standard Compliance Period 2 (2014-2016)
<b>TN #:</b>	233501
<b>Document Title:</b>	Notice of Availability and Request for Comment on Renewables Portfolio Standard
<b>Description:</b>	2014-2016 Verification Results Staff Draft Report for San Francisco Public Utilities Commission - Hetch Hetchy Power
<b>Filer:</b>	Kevin Chou
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	6/16/2020 4:36:03 PM
<b>Docketed Date:</b>	6/16/2020

**CALIFORNIA ENERGY COMMISSION**1516 Ninth Street  
Sacramento, California 95814Main website: [www.energy.ca.gov](http://www.energy.ca.gov)  
CEC-57 (Revised 1/19)

In the matter of:	)	Docket No. 18-RPS-02
	)	
Renewables Portfolio Standard Compliance	)	RE: Publicly Owned Electric Utility
Period 2 (2014-2016)	)	Verification Results Staff Draft
_____	)	Report

**Notice of Availability and Request for Comments on**  
*Renewables Portfolio Standard*  
*Verification Results for San Francisco Public*  
*Utilities Commission - Hetch Hetchy Power*  
*Compliance Period 2 (2014-2016), Staff Draft*  
*Report*

The *Renewables Portfolio Standard Verification Results for San Francisco Public Utilities Commission – Hetch Hetchy Power, Compliance Period 2 (2014-2016) Staff Draft Report, (RPS POU Verification Results Draft Report)*, is available at <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard-1-1>, and [summary claims details](#) for San Francisco Public Utilities Commission (SFPUC) – Hetch Hetchy Power are available on the California Energy Commission’s (CEC) website at [https://ww2.energy.ca.gov/portfolio/documents/verification\\_results/cp02\\_2014-2016/pous/](https://ww2.energy.ca.gov/portfolio/documents/verification_results/cp02_2014-2016/pous/).

The *RPS POU Verification Results Draft Report* for SFPUC – Hetch Hetchy Power details CEC staff’s verification findings of renewable energy procurement claims submitted by SFPUC – Hetch Hetchy Power for Compliance Period 2 (CP 2) of the Renewables Portfolio Standard (RPS), covering the years 2014-2016. A total of 43 local publicly owned electric utilities (POUs) reported claims for CP 2. SFPUC – Hetch Hetchy Power is the final POU with pending verification results for CP 2. The CEC previously adopted the *RPS POU Verification Results Reports* for the other 42 POUs at regularly scheduled business meetings.

Summary claims details tables will be posted to provide detailed information about SFPUC – Hetch Hetchy Power’s *RPS POU Verification Results Draft Report*. The summary claims details provide the RPS claims reported by each POU for CP 2, and includes detailed information on claims deemed eligible, claims determined to be ineligible, and claims withdrawn by the reporting POU.

As part of its administrative responsibilities, the CEC verifies the RPS procurement claims of both retail sellers and POU. The *Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities* establishes the rules and procedures by which the CEC assesses a POU’s compliance with RPS procurement requirements. The methods used by the CEC to verify procurement claims for RPS program participants are generally described in the *Renewables Portfolio Standard Eligibility Guidebook, Ninth Edition (Revised)* and further detailed in the *Renewables Portfolio Standard Verification Methodology Report, Second Edition*. [These documents](#) can be found at

<https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard>

SFPUC- Hetch Hetchy Power qualifies for alternative procurements requirements pursuant to 20 CCR section 3204 (a)(7) of the Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities. Therefore, its procurement target is determined annually, instead of on a compliance period basis, and it is exempt from the portfolio balance requirements.

Stakeholders and the public have an opportunity to review and provide comments on SFPUC – Hetch Hetchy Power’s *RPS POU Verification Results Draft Report*. Staff will consider comments, and a final version of the *RPS POU Verification Results Draft Report* will be considered for adoption by the CEC at a regularly scheduled business meeting.

## **Background**

Established in 2002, California’s RPS is one of the most ambitious renewable energy policies in the nation. Enacted by Senate Bill (SB) 1078 (Sher, Chapter 516, Statutes of 2002), and accelerated and expanded by subsequent legislation, California’s RPS establishes increasingly progressive renewable energy procurement targets for the state’s load-serving entities. Originally applicable to retail sellers, the statewide mandatory RPS was expanded by SB X1-2 (Simitian, Chapter 1, Statutes of 2011, First Extraordinary Session) to include POU starting in 2011. SB 100 (De León, Chapter 312, Statutes of 2018) increased the procurement targets, requiring both retail sellers and POU to increase their procurement of eligible renewable energy resources to 60 percent of retail sales by 2030.

California’s RPS is administered by the CEC and the California Public Utilities Commission (CPUC). As part of its responsibilities, the CEC verifies the eligibility of renewable energy procured by all load-serving entities, which include retail sellers, POU, and all other entities providing retail sales of electricity in California that are obligated to participate in California’s RPS. The CEC is also responsible for certifying

RPS eligible renewable energy resources, developing a tracking system to verify renewable energy procurement for all program participants, and overseeing compliance and enforcement of the POU's. The CPUC is responsible for compliance and enforcement for retail sellers.

The verification results provided in the *RPS POU Verification Results Draft Report* are not a compliance determination. After the CEC adopts the report, staff will begin the process of determining if SFPUC – Hetch Hetchy Power complies with the RPS requirements for CP 2, as set forth in the California Code of Regulations, Title 20, Sections 1240 and 3200-3208.

The *RPS POU Verification Results Draft Report* is available on the [California Energy Commission Docket Log](#) at <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=18-RPS-02>

### **Written Comments**

Interested members of the public are encouraged to review and comment on the *RPS POU Verification Results Draft Report*. Written comments must be submitted to the Docket Unit by **5:00 p.m. on June 26, 2020**. Written and oral comments, attachments, and associated contact information, such as address, phone number, and email address, become part of the viewable public record. This information may also become available via any Internet search engine.

The CEC encourages use of its electronic commenting system. Visit [CEC E-filing Docket Number 18-RPS-02](#), which links to the comment page for this docket at <https://efiling.energy.ca.gov/EComment/ECommentSelectProceeding.aspx>.

Select or enter a proceeding to be taken to the "Add Comment" page. Enter your contact information and a comment title describing the subject of your comment(s). Comments may be included in the "Comment Text" box or attached in a downloadable, searchable Microsoft® Word (.doc, .docx) or Adobe® Acrobat® (.pdf) file. Maximum file size is 10 MB.

Written comments may also be submitted by email. Include docket number 18-RPS-02 and "RPS POU Verification Results Draft Report for CP 2" in the subject line and send to [publicadvisor@energy.ca.gov](mailto:publicadvisor@energy.ca.gov).

### **Public Advisor and Other Commission Contacts**

The CEC's Public Advisor's Office provides the public assistance in participating in CEC proceedings. For information on how to participate in this proceeding, or to request language services or other reasonable accommodations, please contact the public advisor, Noemí O. Gallardo, at [publicadvisor@energy.ca.gov](mailto:publicadvisor@energy.ca.gov), or by phone at (916) 654-4489, or toll free at (800) 822-6228. Requests for language services and reasonable accommodations should be made at least five days in advance. The CEC will work diligently to accommodate late requests.

Media inquiries should be directed to the Media and Public Communications Office at [mediaoffice@energy.ca.gov](mailto:mediaoffice@energy.ca.gov) or (916) 654-4989.

Questions on the subject matter of this meeting should be directed to Kevin Chou at [Kevin.Chou@energy.ca.gov](mailto:Kevin.Chou@energy.ca.gov) or (916) 653-1628.

/Original Signed/\_\_\_\_\_

Natalie Lee  
Deputy Director

Mail Lists:  
Renewable listserv

**DOCKETED**

<b>Docket Number:</b>	18-RPS-02
<b>Project Title:</b>	Renewables Portfolio Standard Compliance Period 2 (2014-2016)
<b>TN #:</b>	233500
<b>Document Title:</b>	Staff Draft Report - Renewables Portfolio Standard Compliance Period 2 (2014-2016)
<b>Description:</b>	San Francisco Public Utilities Commission - Hetch Hetchy Power - Staff Draft RPS Verification Results Report for Compliance Period 2
<b>Filer:</b>	Kevin Chou
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	6/16/2020 4:25:52 PM
<b>Docketed Date:</b>	6/16/2020



**CALIFORNIA  
ENERGY COMMISSION**



**CALIFORNIA  
natural  
resources  
AGENCY**

California Energy Commission

## **STAFF DRAFT REPORT**

# **Renewables Portfolio Standard Verification Results**

**San Francisco Public Utilities Commission –  
Hetch Hetchy Power  
Compliance Period 2 (2014-2016)**

**Gavin Newsom, Governor  
June 2020 | CEC-300-2020-010-SD**

# California Energy Commission

Kevin Chou  
Theresa Daniels  
Adriana Dominguez  
Sean Inaba  
Christopher Metzker  
Olga Romaso

**Primary Authors**

Roxanne Henriquez  
**Project Manager**

Jonathan Fong  
**Office Manager**  
**RENEWABLE ENERGY DIVISION**

Natalie Lee  
**Deputy Director**  
**RENEWABLE ENERGY DIVISION**

Drew Bohan  
**Executive Director**

## **DISCLAIMER**

**Staff members of the California Energy Commission prepared this report. As such, it does not necessarily represent the views of the Energy Commission, its employees, or the State of California. The Energy Commission, the State of California, its employees, contractors and subcontractors make no warrant, express or implied, and assume no legal liability for the information in this report; nor does any party represent that the uses of this information will not infringe upon privately owned rights. This report has not been approved or disapproved by the Energy Commission nor has the Commission passed upon the accuracy or adequacy of the information in this report.**

# **RPS Verification Results: Compliance Period 2 San Francisco Public Utilities Commission (SFPUC) – Hetch Hetchy Power**

---

## **Background**

Established in 2002, California’s Renewables Portfolio Standard (RPS) is one of the most ambitious renewable energy policies in the nation. Enacted by Senate Bill 1078 (Sher, Chapter 516, Statutes of 2002) and accelerated and expanded by subsequent legislation, California’s RPS establishes increasingly progressive renewable energy procurement targets for the state’s load-serving entities. Originally, California’s statewide RPS was restricted to retail sellers.<sup>1</sup> Senate Bill X1-2 (Simitian, Chapter 1, Statutes of 2011, First Extraordinary Session) expanded the statewide mandatory RPS to apply to local publicly owned electric utilities (POU) starting in 2011. Senate Bill 100 (De León, Chapter 312, Statutes of 2018) increased the procurement targets, requiring retail sellers and POUs to increase their procurement of eligible renewable energy resources to 60 percent of retail sales by 2030.

The California Energy Commission (CEC) verifies the eligibility of renewable energy procured by load-serving entities, which include retail sellers, POUs, and all other entities serving retail sales of electricity in California that are obligated to participate in California’s RPS. The CEC is also responsible for certifying RPS-eligible renewable energy resources, developing a tracking system to verify renewable energy procurement for all program participants, and overseeing compliance and enforcement for the POUs. The California Public Utilities Commission is responsible for compliance and enforcement for retail sellers.

## **Report Overview**

This report covers the verification results for POU procurement claims for Compliance Period 2, which covered 2014 through 2016. The verification results provide an overview of the identified POU’s results and tables, including:<sup>2</sup>

- The POU’s procurement targets.
- The amount of eligible renewable energy retired and the amount applied to meet the RPS procurement requirements, both shown by Portfolio Content Category (PCC) and other classifications.
- Any deficits in meeting RPS procurement requirements.
- Any optional compliance measures being applied by the POU.
- A calculation of excess procurement accumulated per year.

---

1 Public Utilities Code Section 399.12 (j) defines retail seller as an Entity engaged in the retail sale of electricity to end-use customers within the state. Retail sellers include electrical corporations, community choice aggregators, and electric service providers, but not POUs.

2 The contents of verification results reports will vary for POUs with specific exclusions, exceptions, or different procurement requirements under the RPS statutes and as described in the *Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities* based on the requirements specific to that POU.

- A summary of the POU's excess procurement and historical carryover, if any, including any prior balances, the amounts accumulated and used in each of the compliance years, and the ending balances.

In adopting this report, the CEC finds the procurement claim amounts listed in this report are consistent with RPS certification and procurement requirements specified in the [Renewables Portfolio Standard Eligibility Guidebook, Ninth Edition \(Revised\)](#) (RPS Eligibility Guidebook) and the [Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities](#)<sup>3</sup> (RPS POU Regulations) and are eligible for the RPS as indicated. Therefore, the procurement claim amounts can count toward meeting the identified POU's RPS procurement requirements. Both documents can be found at <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard>.

## Verification Process

The methods used by the CEC to verify load-serving entity procurement claims are detailed in the RPS Eligibility Guidebook and explained in the [Renewables Portfolio Standard Verification Methodology Report, Second Edition](#), which can be found at <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard>.

The verification results presented in this report are not a compliance determination. After the CEC adopts a POU's verification results, it will begin determining if the POU complies with the RPS requirements for Compliance Period 2 in accordance with the RPS POU Regulations.

## SFPUC – Hetch Hetchy Power Verification Results

Public Utilities Code (PUC) Section 399.30 (j) establishes alternative procurement requirements for a POU in a city and county that receives greater than 67 percent of its electricity sources from in-state owned hydroelectric facilities. To qualify, a POU must show that it meets the requirements of 20 CCR Section 3204 (a)(7) of the RPS POU Regulations by submitting documentation showing that it receives at least an average of 67 percent of its electricity demand in the seven years preceding each compliance period from qualifying hydroelectric generation.

If a POU can show that it meets the criteria for the alternative procurement requirements, the POU's procurement target is determined annually, instead of on a compliance period basis, and the POU is exempt from the portfolio balance requirements. If the POU has electricity demand unsatisfied by its qualifying hydroelectric generation in any given year, the POU's procurement target is set at the lesser of the following:

1. The portion of the POU's electricity demand unsatisfied by the POU's qualifying hydroelectric generation
2. The soft target corresponding to that year

---

<sup>3</sup> The *Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities* are set forth in 20 CCR §§ 1240 and 3200–3208 and establish the rules and procedures by which the CEC will assess a POU's procurement actions and determine whether those actions meet the RPS requirements.

To determine the POU's procurement target for any given year, the POU must report its electricity demand, instead of retail sales, and its qualifying hydroelectric generation.

SFPUC – Hetch Hetchy Power provided documentation demonstrating that it qualifies for the alternative procurement requirements in 20 CCR Section 3204 (a)(7) of the RPS POU Regulations during Compliance Period 2. Therefore, SFPUC — Hetch Hetchy Power must meet stand-alone procurement targets in 2014, 2015, and 2016 that are determined by the annual amount of electricity demand unsatisfied by SFPUC — Hetch Hetchy Power's qualifying hydroelectric generation. Furthermore, SFPUC — Hetch Hetchy Power does not have a Category 1 portfolio balance requirement or limitation on Category 3 procurement during Compliance Years 2014–2016.

For Compliance Year 2014, SFPUC — Hetch Hetchy Power's electricity demand unsatisfied by qualifying hydroelectric generation was equal to 88,935 renewable energy credits (RECs) or 9.04 percent of its total electricity demand. SFPUC — Hetch Hetchy Power retired and reported 792,521 renewable energy credits (RECs), and 792,521 were verified by the CEC as RPS-eligible. SFPUC – Hetch Hetchy Power applied 88,935 RECs toward the 2014 RPS procurement requirements, meeting the annual procurement target.

For Compliance Year 2015, SFPUC — Hetch Hetchy Power's electricity demand unsatisfied by qualifying hydroelectric generation was equal to 63,510 RECs or 6.50 percent of its total electricity demand. SFPUC — Hetch Hetchy Power retired and reported 63,528 RECs, and 63,528 were verified by the CEC as RPS-eligible. SFPUC – Hetch Hetchy Power applied 63,528 RECs toward the 2015 RPS procurement requirements, meeting the annual procurement target.

For Compliance Year 2016, SFPUC — Hetch Hetchy Power's electricity demand unsatisfied by qualifying hydroelectric generation was equal to 7,831 RECs or 0.82 percent of its total electricity demand. SFPUC - Hetch Hetchy Power retired and reported 10,095 RECs, and 10,095 were verified by the CEC as RPS-eligible. SFPUC – Hetch Hetchy Power applied 7,831 RECs toward the 2016 RPS procurement requirements, meeting the annual procurement target.



Procurement Target Calculation (MWh) <sup>1</sup>	Total Electricity Demand	Qualifying Hydroelectric Generation	Electricity Demand not met by Hydroelectric Generation	Soft Target Percentage	Soft Target
	983,928	894,993	88,935	20%	196,785
	<b>Procurement Target<sup>2</sup></b>				<b>88,935</b>

Verification Results	
Target	88,935
Applied	88,935
Deficit	0
Renewable Percentage	9.04%

RECs Available <sup>3</sup>	Category 0 (PCC 0)	Category 1 (PCC 1)	Pre June 2010 PCC 1	Category 2 (PCC 2)	Category 3 (PCC 3)	Pre June 2010 PCC 3	Historic Carryover	Total
Eligible RECs Retired	14,015	209	734,780	0	43,517	0		792,521
Prior Balances Available	0	0	0	0			0	0
<b>Total RECs Available</b>	<b>14,015</b>	<b>209</b>	<b>734,780</b>	<b>0</b>	<b>43,517</b>	<b>0</b>	<b>0</b>	<b>792,521</b>

RECs Applied	Category 0 (PCC 0)	Category 1 (PCC 1)	Pre June 2010 PCC 1	Category 2 (PCC 2)	Category 3 (PCC 3)	Pre June 2010 PCC 3	Historic Carryover	Total
RECs Applied to 2014	14,015	209	31,194	0	43,517	0	0	88,935

RPS Portfolio Balance Requirements (MWh) <sup>4</sup>	
Category 1 Balance Requirement	N/A
Category 1 Requirement Deficit	N/A
Category 3 Balance Limitation	N/A
Category 3 Disallowed	N/A

Optional Compliance Measures Applied	
Cost Limitation	No
Delay of Timely Compliance	No
Portfolio Balance Reduction	N/A

2014 Excess Procurement Calculation (MWh) <sup>5</sup>	Category 0 (PCC 0)	Category 1 (PCC 1)	Pre June 2010 PCC 1	Category 2 (PCC 2)
Eligible RECs Retired	14,015	209	734,780	0
RECs Applied	-14,015	-209	-31,194	0
Deductions	0	0	0	0
<b>Accumulated in 2014</b>	<b>0</b>	<b>0</b>	<b>703,586</b>	<b>0</b>

Balance of Excess Procurement and Historic Carryover (MWh)	Category 0 (PCC 0)	Category 1 (PCC 1)	Pre June 2010 PCC 1	Category 2 (PCC 2)	Historic Carryover
Beginning Balance	0	0	0	0	0
Applied in 2014	0	0	0	0	0
Accumulated in 2014	0	0	703,586	0	
<b>Ending Balance</b>	<b>0</b>	<b>0</b>	<b>703,586</b>	<b>0</b>	<b>0</b>

1. "Soft Target" is defined in section 3201 of the RPS POU Regulations.  
 2. Equal to the lesser of the Soft Target or the electricity demand not met by the qualifying hydroelectric generation.  
 3. Total RECs Available does not include Disallowed PCC 3 RECs.  
 4. Calculated as specified in section 3204(c) of the RPS POU Regulations.  
 5. Calculated as described in the RPS Verification Methodology Report, Second Edition and in section 3206(a)(1) of the RPS POU Regulations.



Procurement Target Calculation (MWh) <sup>1</sup>	Total Electricity Demand	Qualifying Hydroelectric Generation	Electricity Demand not met by Hydroelectric Generation	Soft Target Percentage	Soft Target
	976,339	912,829	63,510	20%	195,267
	Procurement Target <sup>2</sup>				<b>63,510</b>

Verification Results	
Target	63,510
Applied	63,528
Deficit	0
Renewable Percentage	6.51%

RECs Available <sup>3</sup>	Category 0 (PCC 0)	Category 1 (PCC 1)	Pre June 2010 PCC 1	Category 2 (PCC 2)	Category 3 (PCC 3)	Pre June 2010 PCC 3	Historic Carryover	Total
Eligible RECs Retired	8,636	622	1,070	0	53,200	0		63,528
Prior Balances Available	0	0	703,586	0			0	703,586
<b>Total RECs Available</b>	<b>8,636</b>	<b>622</b>	<b>704,656</b>	<b>0</b>	<b>53,200</b>	<b>0</b>	<b>0</b>	<b>767,114</b>

RECs Applied	Category 0 (PCC 0)	Category 1 (PCC 1)	Pre June 2010 PCC 1	Category 2 (PCC 2)	Category 3 (PCC 3)	Pre June 2010 PCC 3	Historic Carryover	Total
RECs Applied to 2015	8,636	622	1,070	0	53,200	0	0	63,528

RPS Portfolio Balance Requirements (MWh) <sup>4</sup>	
Category 1 Balance Requirement	N/A
Category 1 Requirement Deficit	N/A
Category 3 Balance Limitation	N/A
Category 3 Disallowed	N/A

Optional Compliance Measures Applied	
Cost Limitation	No
Delay of Timely Compliance	No
Portfolio Balance Reduction	N/A

2015 Excess Procurement Calculation (MWh) <sup>5</sup>	Category 0 (PCC 0)	Category 1 (PCC 1)	Pre June 2010 PCC 1	Category 2 (PCC 2)
Eligible RECs Retired	8,636	622	1,070	0
RECs Applied	-8,636	-622	-1,070	0
Deductions	0	0	0	0
<b>Accumulated in 2015</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Balance of Excess Procurement and Historic Carryover (MWh)	Category 0 (PCC 0)	Category 1 (PCC 1)	Pre June 2010 PCC 1	Category 2 (PCC 2)	Historic Carryover
Beginning Balance	0	0	703,586	0	0
Applied in 2015	0	0	0	0	0
Accumulated in 2015	0	0	0	0	
<b>Ending Balance</b>	<b>0</b>	<b>0</b>	<b>703,586</b>	<b>0</b>	<b>0</b>

1. "Soft Target" is defined in section 3201 of the RPS POU Regulations.  
 2. Equal to the lesser of the Soft Target or the electricity demand not met by the qualifying hydroelectric generation.  
 3. Total RECs Available does not include Disallowed PCC 3 RECs.  
 4. Calculated as specified in section 3204(c) of the RPS POU Regulations.  
 5. Calculated as described in the RPS Verification Methodology Report, Second Edition and in section 3206(a)(1) of the RPS POU Regulations.



Procurement Target Calculation (MWh) <sup>1</sup>	Total Electricity Demand	Qualifying Hydroelectric Generation	Electricity Demand not met by Hydroelectric Generation	Soft Target Percentage	Soft Target
	954,488	946,657	7,831	25%	238,622
	<b>Procurement Target<sup>2</sup></b>				<b>7,831</b>

Verification Results	
Target	7,831
Applied	7,831
Deficit	0
Renewable Percentage	0.82%

RECs Available <sup>3</sup>	Category 0 (PCC 0)	Category 1 (PCC 1)	Pre June 2010 PCC 1	Category 2 (PCC 2)	Category 3 (PCC 3)	Pre June 2010 PCC 3	Historic Carryover	Total
Eligible RECs Retired	0	0	0	0	10,095	0		10,095
Prior Balances Available	0	0	703,586	0			0	703,586
<b>Total RECs Available</b>	<b>0</b>	<b>0</b>	<b>703,586</b>	<b>0</b>	<b>10,095</b>	<b>0</b>	<b>0</b>	<b>713,681</b>

RECs Applied	Category 0 (PCC 0)	Category 1 (PCC 1)	Pre June 2010 PCC 1	Category 2 (PCC 2)	Category 3 (PCC 3)	Pre June 2010 PCC 3	Historic Carryover	Total
RECs Applied to 2016	0	0	0	0	7,831	0	0	7,831

RPS Portfolio Balance Requirements (MWh) <sup>4</sup>	
Category 1 Balance Requirement	N/A
Category 1 Requirement Deficit	N/A
Category 3 Balance Limitation	N/A
Category 3 Disallowed	N/A

Optional Compliance Measures Applied	
Cost Limitation	No
Delay of Timely Compliance	No
Portfolio Balance Reduction	N/A

2016 Excess Procurement Calculation (MWh) <sup>5</sup>	Category 0 (PCC 0)	Category 1 (PCC 1)	Pre June 2010 PCC 1	Category 2 (PCC 2)
Eligible RECs Retired	0	0	0	0
RECs Applied	0	0	0	0
Deductions	0	0	0	0
Accumulated in 2016	0	0	0	0

Balance of Excess Procurement and Historic Carryover (MWh)	Category 0 (PCC 0)	Category 1 (PCC 1)	Pre June 2010 PCC 1	Category 2 (PCC 2)	Historic Carryover
Beginning Balance	0	0	703,586	0	0
Applied in 2016	0	0	0	0	0
Accumulated in 2016	0	0	0	0	
<b>Ending Balance</b>	<b>0</b>	<b>0</b>	<b>703,586</b>	<b>0</b>	<b>0</b>

1. "Soft Target" is defined in section 3201 of the RPS POU Regulations.  
 2. Equal to the lesser of the Soft Target or the electricity demand not met by the qualifying hydroelectric generation.  
 3. Total RECs Available does not include Disallowed PCC 3 RECs.  
 4. Calculated as specified in section 3204(c) of the RPS POU Regulations.  
 5. Calculated as described in the RPS Verification Methodology Report, Second Edition and in section 3206(a)(1) of the RPS POU Regulations.