SDGE Southern California Gas Company

Sempra Energy utilities

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May 21, 2007

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Dear Commissioners:

RE: Docket No. 03-RPS-1078 (RPS Proceeding); RPS 2005 Procurement Verification Report

San Diego Gas & Electric Company ("SDG&E") appreciates this opportunity to offer its comments concerning the draft *Renewables Portfolio Standard 2005 Procurement Verification Report* (the "Report") prepared by California Energy Commission ("Commission") staff. While SDG&E believes that the draft Report is generally accurate, it notes certain errors that must be corrected prior to adoption of the Report. Corrected data intended to replace this erroneous data is noted in red in the document attached hereto as Attachment A.

Should you have any questions regarding these revisions, please do not hesitate to contact Pat Charles at (858) 637 7909.

Sincerely,

Bernie Orozco

Table 20: SDG&E RPS Procurement								
	RPS Procurement for SDG&E (MWh)[1]				Percent of Retail Sales			
	2001	2003	2004	2005	2001	2003	2004	2005
APT	na	na	446,625	604,740	na	na	2.97%	3.82%
IPT	na	na	150,439	158,116	na	na	1%	1%
Incremental Procurement[2,3]	na	na	381,666	378,741	na	na	2.41%	2.37%
Total procurement[3]	145,760	na	677,852	825,366	0.97%	3.84%	4.51%	5.22%
Procurement from Facilities Without RPS-Certification[4]	na	na	114	0	na	na	0.00%	0.00%
Procurement from Facilities in Which Procurement Exceeds Generation by 5 percent or greater[5]	na	na	na	na	na	na	na	na
Procurement from Distributed Generation Facilities[6]	na	na	na	na	na	na	na	na
Procurement Eligible Towards the APT[7]	na	na	677,852	825,366	na	na	4.51%	5.22%
Retail sales[8]	14,998,806	15,043,865	15,811,591	16,001,516	na	na	na	na

Table 21: SDG&E RPS Procurement Targets[1]				
Target	2004 Target MWh	2005 Target MWh	2004 Percent of 2003 Retail Sales	2005 Percent of 2004 Retail Sales
IPT	150,439	158,116	1.00%	1.00%
APT	446,625	604,741 ~~604,740~~	2.97%	3.82%

[1] The 2003 through 2005 targets are based on the methodology adopted in decision 06-10-050, R.06-05-027 on October 19, 2006.

Table 22: Difference Between SDG&E RPS Procurement and Targets				
Eligibility	2004 Procurement (MWh)	2005 Procurement (MWh)	2004 Percent Above Target	2005 Percent Above Target
Qualifying APT Procurement	677,852	825,366	~~51.92%~~ 51.77%	~~36.50%~~ 36.48%

	A	B	C	D	E	F	G	H	I	J
1	Facility Name	Fuel Type	CEC RPS Certification Number[1]	EIA Number[2]	CEC ID Number[3]	CEC Plant ID Number[4]	ISO Resource ID Number[5]	QF ID Number[6]	Procurement Reported on CEC-RPS-Track (kWh)[7]	Procurement From Other Retail Sellers Reported to the Power Source Disclosure Program(kWh)[8]
2	Otay Landfill	Landfill Gas	60433E	No Data	30073	E0061	OTAY_6_UNITB1	153	11,619,087	0
3	Otay Landfill		60434E	No Data	30176	E0061		154	10,486,279	0
4	San Marcos Landfill		60435E	No Data	30126	E0075	SMRCOS_6_UNIT 1	156	9,000,611	0
5	GRS - Sycamore		60486A	10387	No Data	E0094	CHILLS_7_UNITA1	No Data	8,736,000	0
6	Sycamore Landfill		60436E	No Data	30130	E0094	CHILLS_1_SYCLFL	152	10,017,538	0
7	Alvarado Hydro Facility	Conduit Hydro	60437E	No Data	No Data	H0006	No Data	151	7,453,894	0
8	Badger Filtration Plant		60438E	50147	No Data	H0016	No Data	17	2,408,036	0
9	Bear Valley Hydro		60439E	457	No Data	H0021	No Data	5000 b	1,508,904	0
10	Olivenhain Municipal Water Dist		60441E	No Data	No Data	H0369	No Data	226	1,143,972	0
11	San Francisco Peak Hydro Plant		60442E	No Data	No Data	H0439	No Data	119	618,777	0
12	Cal West Industrial Park	Solar	No Data	No Data	No Data	No Data	No Data	476	114,195	0
13	MM San Diego - Miramar	Landfill Gas	60481A	No Data	No Data	E0054	MSHGTS_6_MMARLF	No Data	27,378,000	0
14	MM San Diego - North City		60482A	No Data	No Data	E0202	NOCITY_7_ESGATE	No Data	9,926,000	0
15	MM Prima Deshecha		60552A	No Data	No Data	E0194	PRMADS_7_CPSTNO	No Data	36,737,000	0
16	GRS - Coyote Canyon		60485A	No Data	No Data	E0117	GRSCYT_6_SANTGO	No Data	65,124,000	0
17	San Diego MWD (Point Loma)		60551A	No Data	No Data	No Data	CBRLLO_6_PLSTP1	No Data	23,451,000	0
18	AES Delano	Biomass	60431A	10840	10034	E0029	PANDOL_6_UNIT	No Data	337,466,000	0
19	Oasis Power Partners	Wind	60489A	50006	No Data	No Data	VINCNT_2_WESTWD	No Data	24,000	0
20	PPM Energy	Wind	60430A 60445A	56075,56112	50048, 50084	No Data	MTWIND_1_UNIT3 PWEST_1_UNIT	No Data	75,899,644	0
21	WTE Acquisition	Wind	55396	No Data	50011	No Data	GARNET_1_UNITS	No Data	38,854,161	4,277,000

	K	L	M	N	O	P	Q	R	S	T	U
1	Procurement Reported to the Energy Commission (kWh)[9]	CEC-1304 Report Filings to the Energy Commission By Generators (MWh)[10]	EIA-906 and EIA-920 Forms Submitted to the Energy Information Administration By Generators (MWh)[11]	Data Reported to the Energy Commission's Existing Renewable Facilities Program (kWh)[12]	Data Reported to the Energy Commission's New Renewable Facilities Program (kWh)[13]	Data Reported to the Energy Commission's Wind Performance Report Summary (kWh)[14]	Reported by Generator on CEC-RPS-GEN[15]	Invoices submitted by Utility (MWh)[16]	Generation Data Used For Comparison with Procurement (Largest Value From Columns L-P)[17]	Difference between Generation and Annual Procurement (kWh)[18]	Percentage Difference Between the Highest Generation Total and Annual Procurement[19]
2	11,619,087	12,085	No Data	No Data	No Data	No Data	No Data	No Data	12,084,595	465,508	4.0%
3	10,486,279	10,907	No Data	No Data	No Data	No Data	No Data	No Data	10,907,405	421,126	4.0%
4	9,000,611	No Data	No Data	No Data	No Data	No Data	No Data	No Data	NA	NA	NA
5	8,735,000	No Data	No Data	No Data	No Data	No Data	8,626,916	No Data	8,626,918	-108,082	-1.2%
6	10,017,538	No Data	No Data	No Data	No Data	No Data	No Data	10,017	10,017	-538	0.0%
7	7,453,894	7,454	No Data	No Data	No Data	No Data	No Data	No Data	7,454,000	106	0.0%
8	2,408,036	No Data	No Data	No Data	No Data	No Data	No Data	No Data	NA	NA	NA
9	1,508,904	No Data	No Data	No Data	No Data	No Data	No Data	No Data	NA	NA	NA
10	1,143,972	No Data	No Data	No Data	No Data	No Data	No Data	No Data	NA	NA	NA
11	618,777	No Data	No Data	No Data	No Data	No Data	No Data	No Data	NA	NA	NA
12	114,195	No Data	No Data	No Data	No Data	No Data	No Data	No Data	NA	NA	NA
13	27,378,000	46,855	No Data	No Data	No Data	No Data	No Data	No Data	46,855,000	19,477,000	71.1%
14	9,926,000	30,473	No Data	No Data	No Data	No Data	No Data	No Data	30,473,000	20,547,000	207.0%
15	36,737,000	35,843	No Data	No Data	11,670,700	No Data	No Data	No Data	35,843,000	-894,000	-2.4%
16	65,124,000	64,866	No Data	No Data	No Data	No Data	65,076,592	No Data	65,076,592	-47,408	-0.1%
17	23,451,000	No Data	No Data	No Data	No Data	No Data	No Data	No Data	NA	NA	NA
18	337,466,000	337,526	344,659	343,031,399	No Data	No Data	No Data	No Data	343,031,399	5,565,399	1.6%
19	24,000	No Data	No Data	No Data	No Data	No Data	No Data	No Data	NA	NA	NA
20	75,899,644	No Data	No Data	No Data	59406827 (For 50084)	36374 (For 50048)	No Data	No Data	95,780,827	19,881,183	26.2%
21	43,131,161	No Data	47,998	No Data	No Data	No Data	No Data	No Data	47,998,000	4,866,839	11.3%

	A	B	C	D	E	F	G	H	I	J	K
1	Facility Name	Fuel Type	CEC RPS Certification Number[1]	EIA ID Number[2]	CEC ID Number[3]	CEC Plant ID Number[4]	ISO Resource ID Number[5]	QF ID Number[6]	Other Facility Identifier[7]	Annual Generation Procured (in kWh)[8]	Procurement From Other Retail Sellers Reported to the Power Source Disclosure Program(kWh)[9]
2	Otay Landfill I	Landfill Gas	60433E	No Data	30073	e0061	OTAY_6_UNIT B1	No Data	153 [a]	12,003.296	0
3	Otay Landfill I		60434E	No Data	30176	e0061	OTAY_6_UNIT B1	No Data	154 [a]	10,669.002	0
4	**Total Claims from Otay Landfill**		No Data	No Data	No Data	No Data	No Data	No Data	No Data	22,672.298	0
5	San Marcos Landfill		60436E	No Data	No Data	e0075	SMRCOS_6_UNIT 1	No Data	155 [a]	8,890.506	0
6	Sycamore Landf		60486A	No Data	No Data	No Data	CHILLS_1_SYCLFL	No Data	152 [a]	8,730.972	0
7	GRS - Sycamore		60486A	10387	No Data	E0094	CHILLS_7_UNITA1	No Data	No Data	14,502.000	0
8	**Total Claims from Sycamore**		No Data	No Data	No Data	No Data	No Data	No Data	No Data	23,232.972	0
9	Alvarado Hydro Facility	Conduit Hydro	60437E	No Data	No Data	h0006	No Data	No Data	151 [a]	2,496.708	0
10	Badger Filtration Plant		60438E	50147	No Data	h0016	No Data	No Data	17 [a]	2,311.414	0
11	Bear Valley Hydro		60439E	457	No Data	h0021	No Data	No Data	5005 [b]	4,773.248	0
12	Olivenhain Municipal Water Dist		60441E	No Data	No Data	h0369	No Data	No Data	225 [a]	1,495.220	0
13	San Francisco Peak Hydro Plant		60442E	No Data	No Data	h0439	No Data	No Data	119 [a]	687.082	0
14	MM San Diego - Miramar	Landfill Gas	60481A	No Data	No Data	e0054	MSHGTS_6_MMARLF	No Data	No Data	27,897.687	0
15	MM San Diego - North City		60482A	No Data	No Data	e0202	NOCITY_7_ESGATE	No Data	No Data	10,818.958	0
16	MM Prima Deshecha		60552A	No Data	No Data	e0194	PRMADS_7_CPSTNO	No Data	No Data	33,459.168	0
17	GRS - Coyote Canyon		60485A	No Data	No Data	e0117	GRSCYT_6_SANTGO	No Data	No Data	66,385.000	0
18	San Diego MWD (Point Loma)		60551A	No Data	No Data	No Data	CBRLLO_6_PLSTP1	No Data	No Data	23,767.912	0
19	AES Delano	Biomass	60431A	10840	10034	e0029	PANDOL_6_UNIT	No Data	No Data	298,945.000	0
20	Oasis Power Partners	Wind	60489A	No Data	50006, 50071	No Data	VINCNT_2_WESTWD	No Data	No Data	182,194.000	0
21	PPM Energy	Wind	60430A 60445A	56075, 56112	50048, 50084	No Data	MTWIND_1_UNIT3 PWESTI_1_UNIT	No Data	No Data	85,989,231	0
22	WTE Acquisition	Wind	60443A	55396	50011	No Data	GARNET_1_UNITS	No Data	No Data	28,250.763	0
23	Jamacha Landf	Biogas	60550E	No Data	No Data	No Data	No Data	No Data	No Data	1,098.518	0