



October 3, 2014

California Energy Commission
 Dockets Office, MS-4
 1516 Ninth Street
 Sacramento, CA 95814-5512
 Via e-mail at: docket@energy.state.ca.us
rps33@energy.ca.gov

RE: Docket 11-RPS-01 RPS Implementation

Comments of the City and County of San Francisco On the Proposal to Allow the Creation of Retroactive Renewable Energy Certificates and Extend the Deadline for Use of the Interim Tracking System for the Renewables Portfolio Standard (RPS)

The City and County of San Francisco, through its Public Utilities Commission (SFPUC), supports the California Energy Commission's proposal to extend the time-period that electric utilities can use their Interim Tracking System (ITS) to record renewable energy generation and/or retroactively certify this generation through WREGIS.

As noted at the January 28th workshop on this issue, current WREGIS functionality does not allow for utilities to retroactively record RECs in WREGIS more than 90 days prior to the generating unit's registration. This makes it difficult, if not impossible for utilities to record RECs for units that are retroactively eligible under RPS rules. This includes RPS facilities such as AB920 distributed generation and SBX1-2 water conveyance facilities. Allowing for these resources to be included retroactively in WREGIS is one solution to address this problem. An alternative approach, also proposed by the CEC, is to extend the time-period that utilities may use the ITS to track and record their renewable energy generation. Either approach should give the utilities the flexibility they need to ensure RECs that should be RPS eligible are appropriately accounted for.

Sincerely,

/s/ Michael Hyams

Michael Hyams,
 Acting Manager
 Regulatory and Legislative Affairs
 Power Enterprise

/s/ James Hendry

James Hendry
 Regulatory and Legislative Affairs
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cc: Barbara Hale, Assistant General Manager, Power
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