

September 30, 2013

**VIA E-MAIL RPSTRACK@  
ENERGY.CA.GOV**California Energy Commission  
Docket Office, MS-4  
**Re: Docket No. 11-RPS-01**  
1516 Ninth Street  
Sacramento, CA 95814-5512Re: 2008-2010 Renewable Portfolio Standard Verification Staff Draft Report—Comments of  
Pacific Gas and Electric Company

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to review and provide comments on the California Energy Commission (CEC) *Renewables Portfolio Standard 2008—2010 Verification Draft Staff Report* (Draft Verification Report).<sup>1</sup> The purpose of its comments are to express PG&E's support for the CEC's recommendation to accept pending out-state-claims, as described in Chapter 4,<sup>2</sup> and for the verification findings of the Draft Verification Report, as contained in Chapter 5.<sup>3</sup> Additionally, PG&E recommends CEC Staff correct minor, technical discrepancies uncovered in its review.

PG&E applauds the CEC Staff's extensive work, which is crucial to ensuring the integrity of California's RPS program. The CEC and the California Public Utilities Commission (CPUC) jointly implement California's Renewable Portfolio Standard (RPS). The CEC certifies eligible renewable energy resources and verifies the procurement claims of retail sellers. The Draft Verification Report, while not required by law, is essential to the CPUC's compliance efforts, and for informing decision makers and the public.

Overall, PG&E believes that the report is well-crafted and accurately reflects PG&E's compliance with the RPS program. However, in its review of the Draft Verification Report, PG&E identified two minor, technical discrepancies in the data. While these discrepancies are relevant to the Report's verification results, and should be corrected, they do not create material changes in the results. These discrepancies include:

1. In Table 5, on page 42 of the Report, the "Total Pending Allowances" row is equal to

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<sup>1</sup> Barkalow, G., Daniels, T., & Haile, J. (2013). *Renewables Portfolio Standard 2008-2010 Procurement Verification Draft Staff Report* (CEC-300-2013-010-SD). California Energy Commission, Renewable Energy Division. Retrieved from <http://www.energy.ca.gov/2013publications/CEC-300-2013-010/CEC-300-2013-010-SD.pdf>

<sup>2</sup> Ibid., Pg. 36-37.

<sup>3</sup> Ibid., Pg. 38-64.

4,851,200 kilowatt-hours (kWh) for the 2008 column. This appears to be overstated by 14,200 kWh. PG&E suggests that the “Total Pending Allowances” for 2008 be changed to 4,837,000 kWh, which is currently reported in the “Procurement With Outstanding Issues Regarding Electricity Delivery Verification” row.

2. Based on its review of Table 2, on page 30, and Table 5, on page 42, PG&E identified one discrepancy. Table 2 reports “RPS-Eligible Generation” and “Original WREGIS Claim” for 2009 to be 52,076 megawatt-hours (MWh) and 52,256 MWh respectively. While the difference between these values is 180 MWh, PG&E’s reported withdrawn procurement claim for 2009 in Table 5 is 1,912,000 kWh.

Should CEC Staff determine that the correct difference in “RPS-Eligible Generation” and “Original WREGIS Claims” is only 180 MWh, PG&E requests that the withdrawn amount be adjusted accordingly, reducing the withdrawn amount from 1,912,000 kWh to approximately 180,000 kWh.

In conclusion, PG&E reiterates its support for the findings of the Draft Verification Report and appreciates the consideration of these comments. Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

/s/

Matthew Plummer

cc: Gina Barkalow ([gbarkalo@energy.ca.gov](mailto:gbarkalo@energy.ca.gov))