

CALIFORNIA ENERGY COMMISSION

1516 Ninth Street
Sacramento, California 95814

Main website: www.energy.ca.gov



Request for Comments on the *Draft 2006 Procurement Verification Staff Report Regarding Tradable Renewable Energy Credits*

The California Energy Commission is requesting comments on how the California Public Utilities Commission's Decision 10-03-021 Regarding Tradable Renewable Energy Credits (TRECs) for Renewables Portfolio Standard Compliance affects public comments on the *Draft 2006 Procurement Verification Staff Report* CEC-300-2009-006-SD (*Draft 2006 Verification Report*). The *Draft 2006 Verification Report* presents the 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 draft report is available free from the Energy Commission's website at:

<http://www.energy.ca.gov/portfolio/documents/#documents>

On January 28, 2010, the Energy Commission staff sought comments on the *Draft 2006 Verification Report*. Public comments were received and are being considered for inclusion in the *Final 2006 Verification Report*. On March 11, 2010 the California Public Utility Commission (CPUC) released a decision on TRECs for RPS compliance. This decision is available at:

http://docs.cpuc.ca.gov/PUBLISHED/FINAL_DECISION/115056.htm

Considering the recent development of the CPUC's adoption of this decision, the Energy Commission's Renewables Committee is providing stakeholders with an additional opportunity to submit comments on how, if at all, the TRECs decision affects their previous comments on the *Draft 2006 Verification Report*. Other interested parties are invited to provide comments on how the TRECs decision affects their views on the *Draft 2006 Verification Report*, even if they previously did not submit comments.

Comments will be considered for incorporation into the *Final 2006 Verification Report*, after which staff will present the final report for approval at a regularly scheduled Energy Commission Business Meeting. Following Energy Commission adoption, the CPUC will use the report to determine retail sellers' compliance with the RPS program.

Background

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, electric service providers, and community choice aggregators — to procure 20 percent of their retail electricity sales from eligible sources of renewable energy by 2017. The 20 percent target was accelerated to 2010 by the enactment of Senate Bill 107 (Simitian and Perata, Chapter 464, Statutes of 2006).

The Energy Commission's previous two Verification Reports only analyzed procurement of the three large investor-owned utilities (IOUs): Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company. The scope of this *Draft 2006 Verification Report* has increased significantly relative to previous reports; it covers procurement of small and multi-jurisdictional utilities as well as electric service providers, including the three large IOUs. It also spans multiple years for retail sellers reporting for the first time or reporting adjustments from previous RPS filings.

This report verifies whether all reported procurement was generated by certified RPS-eligible facilities; verifies that there is enough eligible generation to validate the retail seller's procurement claims; determines, to the extent possible, that RPS-eligible energy procured by the retail sellers was counted only once; analyzes RPS-eligible procurement by resource type and by new and repowered generation; verifies that delivery requirements have been met; estimates incremental geothermal procurement; discusses limitations of the interim tracking system; and provides audit results of IOU procurement claims that are 5 percent or less than the facility generation amount.

Energy Commission staff held a workshop in March 2009 to review the initial verification results and solicit public comments. Staff incorporated public comments into the *Draft 2006 Verification Report*. On January 28, 2010, Energy Commission staff released the *Draft 2006 Verification Report* and comments were due February 16, 2010.

Written Comments

Written comments must be submitted by 5 p.m. April 21, 2010. Please include the docket numbers 02-REN-1038 and 03-RPS-1078 and indicate *Draft 2006 Verification Report re: CPUC TREC's Decision* in the subject line or first paragraph of your comments. Please hand deliver or mail an original copy to:

California Energy Commission
**Re: Docket No. 02-REN-1038
and Docket No. 03-RPS-1078**
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5504

The Energy Commission encourages comments by e-mail. Please include your name or organization's in the name of the file. Those submitting comments by electronic mail should provide them in either Microsoft Word format or as a Portable Document (PDF)

to [docket@energy.state.ca.us]. **One paper copy** must also be sent to the Energy Commission's Docket Unit.

Public Participation

The Energy Commission's Public Adviser provides assistance regarding participation in Energy Commission activities. Members of the public who would like information on how to participate may contact the Public Adviser's Office by phone at (916) 654-4489 or toll free at (800) 822-6228, FAX at (916) 654-4493, or e-mail at [publicadviser@energy.state.ca.us]. If you have a disability and need assistance to participate, please contact Lourdes Quiroz at (916) 654-5146.

Members of the public who have technical questions regarding this notice may contact Gina Barkalow, RPS Procurement Verification Project Manager of the Renewable Energy Office, by phone at (916) 654-4057 or by e-mail at [gbarkalo@energy.state.ca.us]. News media should direct inquiries to the Media and Public Communications Office at (916) 654-4989 or by e-mail at [mediaoffice@energy.state.ca.us].

Electronic Mail List: renewable
Mass Mail Lists: 5507, 5501, 5503, 5504
Date Mailed: April 7, 2010