

CALIFORNIA  
ENERGY  
COMMISSION

**RECONCILIATION OF  
RETAILER CLAIMS - 2003**

**COMMISSION REPORT**

OCTOBER 2004  
500-04-067CR



Arnold Schwarzenegger, Governor

# CALIFORNIA ENERGY COMMISSION

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**Principal Author**

Jim Hoffsis  
**Manager**  
TECHNOLOGY MARKET  
DEVELOPMENT OFFICE

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TECHNOLOGY SYSTEMS  
DIVISION

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Drake Johnson  
Caryn Holmes  
Andrea Gough  
Tony Goncalves  
Todd Lieberg  
Adam Pan

## Introduction

Public Utilities Code, Section 398.5(e) requires all retail providers to disclose the source of electricity sold to their customers in California. In addition, the law requires the California Energy Commission (Energy Commission) to prepare an annual report comparing the source of power retailers have disclosed to consumers with the information that the Energy Commission has received about the actual energy generated for consumption in California. The activities carried out to meet this mandate are referred to as the “Power Source Disclosure Program.”

This report, *Reconciliation of Retailer Claims, 2003* fulfills a part of that mandate for calendar year 2003. After reviewing the available data, the Energy Commission staff concludes that retailers’ claims submitted to date are accurate.

Appendix A summarizes statewide participation in the SB 1305 Power Source Disclosure Program. Additionally, Appendix A lists the renewable content of the products provided by retail providers that make specific claims about their products. Senate Bill 1078 (SB 1078, Sher, Chapter 516, Statutes of 2002), the bill mandating that retail providers of electricity meet a Renewable Portfolio Standard (RPS), also requires that publicly owned utilities provide information to their customers about the renewable content of their resource mix. Since these reporting activities constitute a specific claim that requires further participation in the Power Source Disclosure Program, we anticipate that future reconciliation reports will include an assessment of these efforts.

## Background

Enacted in 1997, Senate Bill 1305 (SB 1305, Sher, Chapter 796, Statutes of 1997) ensures that retail providers of electricity disclose to consumers “accurate, reliable, and simple to understand information on the sources of energy used to provide electric services” (Public Utilities Code, Section 398.1(b)). Toward that end, the law requires retail providers of electricity to disclose fuel source information to consumers about the electricity being sold by using a format developed by the Energy Commission. Retail providers who do not make any claims on the power content of their products may claim what the Power Source Disclosure Program refers to as the “California Power Mix” (referred to in the enabling legislation as “Net System Power”). The California Power Mix is “the mix of electricity fuel source types established by the California Energy Commission representing the sources of electricity consumed in California not disclosed as “specific purchases” by retail service providers.

However, retail providers who do make claims differentiating their power mix from the California Power Mix (“claims of specific purchases”) must provide information about the generation sources of their power to a system operator or to the Energy Commission. In addition, these retail providers are required to submit detailed information about their power purchases and retail sales to the Energy Commission after the end of the year.

Appendix A of this report lists the retail providers who made claims of specific purchases along with checkboxes that indicate what type of information they submitted to the Energy Commission for the preceding year. Information submitted by retail providers includes power content labels, annual reports on purchases and sales, and audits that verify the accuracy of the labels and annual reports. Additionally, Appendix A includes the renewable content, if available, of the retail providers' default product.

At the same time, the law requires all electricity generators who report meter data to a system operator to also report generation, fuel type, and fuel type consumed (as a percentage of generation) data to the system operator on a quarterly basis.<sup>1</sup> System operators must then make the generation and fuel source information available to the Energy Commission for the dual purposes of verifying information disclosed to consumers and calculating Net System Power (established annually by the Energy Commission). Generators whose power is claimed as a specific purchase and who don't provide this data to a system operator must provide it directly to the Energy Commission.

Using the detailed information from retail providers and generators, the Energy Commission then prepares and submits an annual report such as this one to the California Public Utilities Commission, comparing annual power source information disclosed to consumers (as directed in Public Utilities Code, Section 398.4) with information on actual electricity generated in California.

In line with SB 1305, the Energy Commission has implemented regulations specifying the following:

- 1) Guidelines and formats for disclosure of generation-related information to system operators and the Energy Commission,
- 2) Guidelines and formats for retail disclosure of fuel source information to consumers by retail providers, and
- 3) Guidelines for annual submissions to the Energy Commission by retail providers.

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<sup>1</sup> Generators that do not report information to system operators but whose electricity is being claimed as a specific purchase report these data directly to the Energy Commission.

These regulations governing the “Power Source Disclosure Program” first went into effect on October 21, 1998 and were amended March 5, 2002. They are found in Title 20 of the California Code of Regulations, beginning with Section 1390.

The format adopted for retail electricity source disclosure to consumers is called the “power content label” (pictured to the right). Using this label, consumers can compare the power “content” — or resource mix — of a given electricity product against that of the California Power Mix. The California Power Mix refers to electricity consumed on a statewide basis as differentiated by fuel type after subtracting out power that has been specifically claimed by retail providers, less self-generation.

Retail providers may use the California Power Mix as default and not make claims differentiating their power from the California Power Mix, or they may claim “specific purchases,” their actual power mix differentiated by fuel type based on purchases from specific generating facilities. Retail providers who make any claims differentiating their power from the California Power Mix are required to disclose their actual power mix as well as the California Power Mix. As such, the power content label allows retail providers of electricity to distinguish their products from other electricity products in the market on the basis of relative mix of resource or fuel type.

<b>POWER CONTENT LABEL</b>		
<b>ENERGY RESOURCES</b>	<b>PRODUCT NAME*</b> (projected)	<b>2003 CA POWER MIX**</b> (for comparison)
Eligible Renewable	54%	8%
-Biomass & waste	-	2%
-Geothermal	-	3%
-Small hydroelectric	-	2%
-Solar	-	<1%
-Wind	-	<1%
Coal	9%	18%
Large Hydroelectric	10%	20%
Natural Gas	21%	42%
Nuclear	6%	12%
Other	<1%	0%
<b>TOTAL</b>	<b>100%</b>	<b>100%</b>

\* 50% of Product Name is specifically purchased from individual suppliers.  
 \*\* Percentages are estimated annually by the California Energy Commission based on the electricity sold to California consumers during the previous year.

For specific information about this electricity product, contact Company Name. For general information about the Power Content Label, contact the California Energy Commission at 1-800-555-7794 or [www.energy.ca.gov/consumer](http://www.energy.ca.gov/consumer).

The Energy Commission also allows retail providers, at their option, to publish the gross system power (pictured below) in addition to their Power Content Label. Gross system power is defined as the sum of all in-state generation and imports by fuel type. The gross system power mix changes from year to year as generation resources are added to or removed from the generation mix. Retailers were allowed to add notes outside the label that clarifies the distinction between the “CA Power Mix” and “gross system power.” However, gross system power cannot be used in calculating the power content of a particular product and cannot be inserted in the column of the power content label as “CA power mix.”

Fuel Type	2003 Gross System Power
Eligible Renewable	10.4%
-Biomass & waste	2.0%
-Geothermal	5.0%
-Small hydroelectric	1.9%
-Solar	0.3%
-Wind	1.2%
Coal	21.3%
Large hydroelectric	16.2%
Natural gas	36.9%
Nuclear	15.2%
Other	<u>0.0%</u>
Total	100.00%

By law, all retail providers must display a label in product-specific written promotional materials, must send their customers quarterly label updates, and if specific purchases are claimed, provide them with an annual label that compares the actual annual resource mix with their projected annual mix. The annual label includes an explanation of variations greater than plus or minus five percentage points.

# Sixth Year Status

## Annual Retail Provider Reports Received

The Energy Commission received *Annual Retail Provider Reports* from 24 companies. Of this total, 22 were retail providers, and 2 were wholesalers or pools from which 18 retail providers purchased power. The following is the list of all companies that submitted reports:

- 3Phases Energy Services
- Commonwealth Energy Corporation
- Green Mountain Energy
- Alameda Power Authority
- Anaheim Public Utility District
- City of Azusa
- City of Colton
- City of Healdsburg
- City of Lodi
- City of Lompoc
- Los Angeles Department of Water and Power
- Modesto Irrigation District
- Palo Alto Electric Utility
- City of Redding
- City of Riverside
- City of Roseville
- Sacramento Municipal Utility District
- Silicon Valley Power
- Southern California Edison Company
- Surprise Valley Electrification Association
- Turlock Irrigation District
- City of Ukiah
- Bonneville Power Administration
- Northern California Power Authority

These companies collectively claimed specific purchases from 374 different generating facilities. Of the 374 generating facilities, 238 facilities are “renewable” as defined by the legislation. Of the 238 renewable facilities claimed, 137 are “registered” renewable generating facilities for purposes of the Energy Commission’s Renewable Energy Program. More than one provider claimed generation from 33 of the 374 generating facilities.

### **Comparison of Retailer Claims**

	<u>2002 Report</u>	<u>2003 Report</u>
Number of Generators Purchased From	358	374
Generators claimed by more than one Retail Provider	36	33
Renewable Generators Purchased From	218	238
Registered Renewable Generators Purchased From	117	137

Five retail providers that submitted annual reports to the Energy Commission for 2002 did not report on 2003 activity. Those retail providers that did not submit reports include two electric service providers, two power pools, and one municipal utility. The 2002 report erroneously reported that the City of Lompoc submitted an annual report but they did not submit one in 2002. In addition, the total specific purchase claims increased from the previous year's total of 96,205 gigawatt-hours to 103,241 gigawatt-hours, an increase of 7,036 gigawatt-hours.

### **Availability of Generation Data**

To prepare this report, it was necessary to gather 2003 calendar year generation data for all 374 generating facilities claimed by the 21 retail providers. In analyzing the year 2003 claims, the Energy Commission supplemented its SB 1305 generation reports with data from the United States Energy Information Administration (EIA), the Energy Commission's Electricity Office, and the Energy Commission's Renewable Energy Program, as described below.

### **Data from the Energy Information Administration**

Generating facilities with a capacity above one megawatt are required to submit generation data to the EIA using one or more various forms. The EIA has made data from some of the reporting forms publicly available on the Internet. In many cases, however, generation data are aggregated and not on a unit-specific basis. The Energy Commission staff was able to obtain generator specific generation data from EIA on utility-owned generating facilities and non-utility-owned facilities from other sources. EIA data played an important part in the development of this report because it provided primary data in some cases and served as a check for data provided as part of the Generation Data Reporting program and the Renewable Energy Program.

In addition, the Energy Commission, and energy agencies in the States of Washington and Oregon are participants in a Department of Energy grant program, with the objective of developing an energy information/tracking system that ultimately would be applicable to the Western Electric Coordinating Council (WECC). The initial database that uses EIA data sources had been developed and is in beta testing. This database assisted in the analysis needed to prepare this report. This is a different and unrelated database to the Western Renewable Energy

Generation Information System (WREGIS), which will be further discussed in a later section of this report.

## **Data from the California Energy Commission's Electricity Office**

The Energy Commission is responsible for collecting data about generation sources on a quarterly basis. The requirements for these reports are found in Title 20, California Code of Regulations, section 1301 et seq. Under these requirements, each owner of an electric power plant over 1 megawatt in California is required to report information including the plant's nameplate capacity, fuel type, generation, and fuel usage to the Energy Commission. While plants with a nameplate capacity of 1 to 10 megawatts are required to report annually, generating facilities larger than 10 megawatts are required to report quarterly.

Recent efforts by Energy Commission staff in the last year have improved the quality and quantity of data utilized to reconcile retail provider claims with available generation. Most of the data reported to the Energy Commission were for in-state power plants. In combination with information from the EIA, which has data for both in-state and out-of-state power plants, all of the necessary generation data utilized were easily accessible.

## **Data from the Renewable Energy Program**

Although many renewable generating facilities have "registered" with the Renewable Energy Program, not all are eligible to receive funding through either the Existing or New Renewable Facilities Programs. However, generating facilities that are registered and eligible for funding submit generation data to the Existing Renewable Facilities Program and the New Renewable Resources Account. These two programs have databases containing generation data for many of California's renewable generating facilities. Because other data sources do not include smaller renewable generating facilities or generators that did not report for 2003, data from the Renewable Energy Program have been useful.

For future reports, staff expects to utilize data submitted to the Energy Commission by retail providers to demonstrate compliance with the RPS. The Energy Commission is tasked with registering and certifying eligible renewable facilities that would qualify for the RPS. In 2003, the Western Governors Association and the Energy Commission began the development of WREGIS that would serve as the tracking and verification system of the RPS. We anticipate that this information will also be helpful in meeting our responsibilities under the Power Source Disclosure Program.

## **Reconciling Retail Providers' Claims**

For calendar year 2003, the actual comparison of retail claims with generation data proved to be more complicated than in the prior year. The number of retail providers (including wholesalers and pools) decreased from 26 to 24 and the number of generators increased from 358 to 374.

Despite the decrease in retail providers claiming specific purchases, the number of generators and amount of gigawatt-hours claimed increased. Retailers claimed specific purchases totaling about 103,241 gigawatt-hours from generators that produced in excess of 224,369 gigawatt-hours. The staff checked to ensure that retail claims for a given generator were less than or equal to the amount of generation reported by that generator. For purposes of the SB 1305 program, it is not necessary to determine the disposition of all the power generated by each claimed generating facility.

<b>Retail Provider Claims</b>		
	<u>2002 Report</u>	<u>2003 Report</u>
Specific Renewable Purchases (GWH)	14,473	15,127
Total Specific Purchases (GWH)	96,205	103,241
<b>Reporting Retail Providers</b>		
Investor-Owned Utility	1	1
ESP	5	3
Municipal Utility	15	17
Electric Cooperative	1	1
<u>Wholesaler/ Pool</u>	<u>4</u>	<u>2</u>
Total	26	24

Plant-specific generation data for several generating facilities could not be found from any of the data sources listed in the previous section, but affidavits or audits by third parties submitted under the Power Source Disclosure Program corroborated the claims made for those facilities. While affidavits or audits by third parties may not give the same level of assurance as meter data or data submitted to the EIA, the Energy Commission staff believes that this source is sufficient for the purposes of this report. The staff will continue to close this data collection gap for next year's report.

Given the information available, all companies reporting to the Energy Commission appear to have purchased sufficient amounts of power of the specified fuel types to meet their claims to consumers.

## **Retail Provider Compliance**

Appendix A of this report is a table that lists active retail providers along with checkboxes that indicate their compliance with SB 1305 Power Source Disclosure Program requirements in 2003. In addition to showing compliance, Appendix A indicates whether or not the retail provider makes claims, and if so, the renewable percentage of the retail provider's product.

The Energy Commission is utilizing this report as a vehicle for demonstrating program compliance because Senate Bill 1078 (SB 1078, Sher, Chapter 516, Statutes of 2002) requires that publicly owned utilities report their resource mix to their customers and their progress in meeting their own RPS. Since this type of reporting constitutes a specific claim about a retail provider's power content, this report contains an identification of whether or not publicly owned utilities who have initiated an RPS program are in compliance with the requirements of the Power Source Disclosure Program.

Out of 53 California retail electric providers, 23 retail providers claimed specific purchases for 2003. Of that group, 22 submitted annual reports to the Energy Commission. Of the retail providers that claimed specific purchases and submitted annual reports, one is an electric cooperative, three are electric service providers, one is an investor-owned utility, and 17 are publicly owned utilities.

Forty-one retail providers submitted quarterly power content labels; twenty-one of those used the California Mix and twenty used projections of their 2003 power mix. However, for the 23 retail providers that claim specific purchases, 13 submitted their annual labels.

Retail providers that claim specific purchases are required to submit an audit of their sales and procurement to the Energy Commission. The Energy Commission has received six audits from retail providers.

For most retail providers, the proportion of their default product that is renewable is unknown because most providers claimed Net System Power for 2003. In 2003, three retail providers, all of which are electric service providers, offered 100 percent renewable products as their default product in 2003. All of these providers participated in the Energy Commission's Customer Credit program through March 2003. For non Customer Credit participants, retail providers' default products ranged from having no renewables to a 56 percent renewable product.

Because of the differences between the SB 1305 definition of renewable and the definition outlined in SB 1078, the numbers posted under "% Renewable" under Appendix A may not be the same as those used to demonstrate compliance with the RPS. Unlike the SB 1305 definition, SB 1078 prohibits certain types of biomass, allows for renewables purchased in previous years, and includes ocean wave and ocean thermal power.

## **Expectations for Next Year's Report**

For the analysis of the year 2004 data, the Energy Commission anticipates having access to more complete data through filings with the Energy Commission and from the EIA. At the same time, the Energy Commission also anticipates an increase in the number of retail claims from municipal retail providers and investor-owned utilities and a reduction in the number of traditional Electric Service Providers (ESPs). The decline in the number of ESPs is the result of the changes in the regulations governing the direct access market and the increasing uncertainty of cost in serving customers during 2003.

Staff expects the number of ESPs participating in the program to decrease in 2004 because the Energy Commission no longer provides incentives to customers who purchase eligible renewables from an ESP through the Customer Credit Program. In 2003, a number of retail providers have either lost customers or have switched from offering renewable products to selling their customers Net System Power. Because ESPs that participated in the Energy Commission's Customer Credit Program comprise a shrinking proportion of specific purchase claims, this may not significantly affect the totals reported in 2004.

Although claims by ESPs are expected to decrease in 2004, staff expects additional specific claims from both investor and publicly owned utilities. The statutory requirements behind the Renewable Portfolio Standard may compel additional retail providers to make claims and retail providers that are already claiming specific purchases may claim additional amounts of specific purchases. As mentioned earlier, publicly owned utilities are required by statute to report their progress to their customers on meeting the RPS, which constitutes a claim of specific purchases, and subjects them to the more extensive reporting requirements.

A significant number of changes were made to the *Annual Retail Provider Reports* after they had been submitted on time (March 1, 2004), and a number of reports were submitted late. These changes and late submissions created problems in determining the total amount of Specific Purchases used to calculate Net System Power, which must be reported by April 15 of each year. The staff will continue to take additional steps to provide retail providers we are aware of with software packages to assist in preparing the *Annual Retail Provider Report*. The staff will continue the high level of outreach to retail providers prior to the reporting date to assist in answering questions related to the reporting of specific purchases in the *Annual Retail Provider Reports*.

In the 2002 edition of this report, staff pointed out that it will explore how the Renewable Portfolio Standard would interact with the Power Source Disclosure Program. The 2003 report includes Appendix A, which provides an indication of program participation and the proportion of sales from renewable generation. As the State develops its RPS Program, staff will continue to explore further interaction between the two programs. Facilities that could qualify for the RPS would need to register with the Energy Commission and they would also be a part of the WREGIS tracking system that is being developed by the Energy Commission and the Western Governors Association. The Power Source Disclosure Program could utilize data extracted from WREGIS for future reports.

# Appendix A: 2003 RETAIL PROVIDER COMPLIANCE

ALL retail providers are required to submit quarterly power content labels.

ONLY retail providers that claim specific purchases are required to submit an Annual Label, Annual Report, and an Audit.

This is the renewable content of the retail provider's default product, as based on the SB 1305 definition of renewable.

<i>Retail Provider</i>	<i>Specific Claims</i>	<i>1st Qtr. Label</i>	<i>2nd Qtr. Label</i>	<i>3rd Qtr. Label</i>	<i>4th Qtr. Label</i>	<i>Annual Label (True Up)</i>	<i>Annual Report</i>	<i>Audit</i>	<i>% Renewable</i>
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## Electric Cooperatives

ANZA	<input type="checkbox"/>	<input type="checkbox"/>	NA						
PLUMAS-SIERRA	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
SUPRISE VALLEY	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1%
VALLEY ELECTRIC ASSN.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NA					

## Electric Service Providers

3Phases Energy Services	<input checked="" type="checkbox"/>	100%							
APS Energy Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
Constellation NewEnergy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
Commonwealth	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	100% until 6/03				
Green Mountain	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	100%
Sempra Energy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
Strategic Energy LLC	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA

ALL retail providers are required to submit quarterly power content labels.

ONLY retail providers that claim specific purchases are required to submit an Annual Label, Annual Report, and an Audit.

This is the renewable content of the retail provider's default product, as based on the SB 1305 definition of renewable.

Retail Provider

Specific Claims

1st Qtr. Label  
2nd Qtr. Label  
3rd Qtr. Label  
4th Qtr. Label

Annual Label (True Up)  
Annual Report  
Audit

% Renewable

### Investor Owned Utilities

Retail Provider	Specific Claims	1st Qtr. Label	2nd Qtr. Label	3rd Qtr. Label	4th Qtr. Label	Annual Label (True Up)	Annual Report	Audit	% Renewable
BEAR VALLEY	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NA
MOUNTAIN UTILITIES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA				
PG&E	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
PACIFICORP	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
S.C.E.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	19%				
S.D.G.&E.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
SIERRA-PACIFIC	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA

### Power Pools

Retail Provider	Specific Claims	1st Qtr. Label	2nd Qtr. Label	3rd Qtr. Label	4th Qtr. Label	Annual Label (True Up)	Annual Report	Audit	% Renewable
Bonneville Power Administration (BPA)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	NA					
Northern California Power Authority (NCPA)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NA					
USBR-CVP	<input type="checkbox"/>	<input type="checkbox"/>	NA						
USBR-PD	<input type="checkbox"/>	<input type="checkbox"/>	NA						
WAPA	<input type="checkbox"/>	<input type="checkbox"/>	NA						

ALL retail providers are required to submit quarterly power content labels.

ONLY retail providers that claim specific purchases are required to submit an Annual Label, Annual Report, and an Audit.

This is the renewable content of the retail provider's default product, as based on the SB 1305 definition of renewable.

Retail Provider

Specific Claims

1st Qtr. Label

2nd Qtr. Label

3rd Qtr. Label

4th Qtr. Label

Annual Label (True Up)

Annual Report

Audit

% Renewable

### Publicly Owned Utilities

Retail Provider	Specific Claims	1st Qtr. Label	2nd Qtr. Label	3rd Qtr. Label	4th Qtr. Label	Annual Label (True Up)	Annual Report	Audit	% Renewable
ALAMEDA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	50%						
AZUSA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2%						
ANAHEIM	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1%						
BIGGS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
BURBANK	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
BANNING	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
CALAVERAS	<input type="checkbox"/>	<input type="checkbox"/>	NA						
COLTON	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3%
ESCONDIDO	<input type="checkbox"/>	<input type="checkbox"/>	NA						
GLENDALE	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
GRIDLEY	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
HEALDSBURG	<input checked="" type="checkbox"/>	<input type="checkbox"/>	56%						
IMPERIAL IRRIGATION DIST.	<input type="checkbox"/>	<input type="checkbox"/>	NA						
LASSEN	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
LOMPOC	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	34%				

ALL retail providers are required to submit quarterly power content labels.

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<i>Retail Provider</i>	<i>Specific Claims</i>	<i>1st Qtr. Label</i>	<i>2nd Qtr. Label</i>	<i>3rd Qtr. Label</i>	<i>4th Qtr. Label</i>	<i>Annual Label (True Up)</i>	<i>Annual Report</i>	<i>Audit</i>	<i>% Renewable</i>
LOS ANGELES D.W.P.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3%
LODI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	31%						
MERCED	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
MODESTO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4%				
NEEDLES	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0%				
PALO ALTO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	7%						
PASADENA	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
REDDING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8%						
RIVERSIDE	<input checked="" type="checkbox"/>	<input type="checkbox"/>	13%						
ROSEVILLE	<input checked="" type="checkbox"/>	<input type="checkbox"/>	14%						
S.M.U.D.	<input checked="" type="checkbox"/>	9%							
SHASTA	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
S.F.H-H	<input type="checkbox"/>	NA							
SILICON VALLEY POWER	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	26%				
TRINITY	<input type="checkbox"/>	NA							
TRUCKEE	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
TUOLUMNE	<input type="checkbox"/>	NA							

ALL retail providers are required to submit quarterly power content labels.

ONLY retail providers that claim specific purchases are required to submit an Annual Label, Annual Report, and an Audit.

This is the renewable content of the retail provider's default product, as based on the SB 1305 definition of renewable.

**Retail Provider**

**Specific Claims**

**1st Qtr. Label**   **2nd Qtr. Label**   **3rd Qtr. Label**   **4th Qtr. Label**

**Annual Label (True Up)**   **Annual Report**   **Audit**

**% Renewable**

TURLOCK	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8%						
UKIAH	<input checked="" type="checkbox"/>	<input type="checkbox"/>	56%						
VERNON	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA