



**California Energy Commission
October 19, 2026, Business Meeting Backup Materials for
Renewables Portfolio Standard 2021-2024 Verification Results Report
Group 2**

The following backup materials for the above-referenced agenda item are available as described below:

1. Proposed Resolution, attached below.
2. CEQA Memo, attached below
3. Resolution, posted immediately after business meeting approval.
4. The 18 Group 2 *Renewables Portfolio Standard 2021-2024 Verification Results for Local Publicly Owned Electric Utilities, Staff Draft Reports*, posting date was October 2, 2026, at
<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-RPS-01>.

For the complete record, please visit: Docket Number 24-RPS-01, at
<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-RPS-01>

To stay informed about this project and receive documents as they are filed, please subscribe to the proceeding “General Renewable Energy Info and CEC Renewable Energy Programs” subscription list, which can be accessed here:
<https://www.energy.ca.gov/subscriptions>. The subscription service sends out email notifications and direct links when documents are filed in the proceeding docket.

CALIFORNIA ENERGY COMMISSION
PROPOSED RESOLUTION: RESOLUTION ADOPTING
RENEWABLES PORTFOLIO STANDARD 2021-2024
VERIFICATION RESULTS REPORTS FOR
18 LOCAL PUBLICLY OWNED ELECTRIC UTILITIES FOR
COMPLIANCE PERIOD 4

RESOLUTION NO: [YY-MMDD]-XX

WHEREAS, Public Utilities Code Section 399.25(b) requires the California Energy Commission to design and implement an accounting system to verify compliance with California’s Renewables Portfolio Standard (RPS) by retail sellers and local publicly owned electric utilities (POUs), to ensure that electricity generated by an eligible renewable energy resource is counted only once for the purpose of meeting the renewables portfolio standard of this state or any other state, and for verifying retail product claims in this state or any other state; and

WHEREAS, the California Energy Commission, in collaboration with the California Public Utilities Commission, has adopted regulations and guidelines addressing its responsibilities under Public Utilities Code Section 399.25(b) as well as other provisions of the law governing California’s RPS, the *Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities* (RPS POU Regulations) and the *Renewables Portfolio Standard Eligibility Guidebook* (RPS Eligibility Guidebook), respectively; and

WHEREAS, in furtherance of Public Utilities Code Section 399.25(b), the California Energy Commission prepares Renewables Portfolio Standard Verification Results Reports on its findings regarding the amount of eligible renewable energy procured by POUs subject to California’s RPS each compliance period; and

WHEREAS, the Renewables Portfolio Standard Verification Results Reports apply the statutory requirements as specified in Public Utilities Code Section 399.11, et seq., the RPS POU Regulations, RPS Eligibility Guidebook, and the California Energy Commission staff *Renewables Portfolio Standard Verification Methodology Report, Fourth Edition*, in determining the amount of renewable energy procurement that qualifies toward each POU’s California RPS procurement requirements; and

WHEREAS, the California Energy Commission staff have prepared a Compliance Period 4 (2021-2024) verification results report for each of the 18 POUs identified in Attachment A hereto, entitled the *California Energy Commission Staff Draft Report Renewables Portfolio Standard Verification Results*; and

WHEREAS, the scope of each of the *California Energy Commission Staff Draft Report Renewables Portfolio Standard Verification Results* includes RPS

procurement verification findings for each of the POU's identified in Attachment A hereto; and

WHEREAS, the *California Energy Commission Staff Draft Report Renewables Portfolio Standard Verification Results* for each POU address the following items, as applicable, with respect to each 18 POU's identified in Attachment A hereto:

- The POU's procurement target, long-term procurement, and portfolio balance requirements and limitations.
- The amount of eligible renewable energy credits retired, and the amount applied to meet the compliance period requirements, both shown by Portfolio Content Category classification and Long-Term Procurement classification, as applicable.
- Any deficits in meeting RPS procurement requirements for the compliance period.
- Any optional compliance measures being applied by the POU for the compliance period.
- A calculation of excess procurement accumulated in this compliance period.
- A summary of the POU's excess procurement and historic carryover, if any, including any prior balance, the amount accumulated and used in the current compliance period, and remaining balance.

WHEREAS, the California Energy Commission has considered the application of the California Environmental Quality Act (CEQA) to the adoption of the *California Energy Commission Staff Draft Report Renewables Portfolio Standard Verification Results*, and concluded that the adoption of these reports is not a "project" under CEQA, but that in the event that adoption were determined to be a project, that it would nonetheless be exempt from CEQA requirements pursuant to the "common sense" exemption (CEQA Guidelines, § 15061, subd. (b)(3)).

THEREFORE, BE IT RESOLVED, that the California Energy Commission hereby adopts the 18 *California Energy Commission Staff Draft Report Renewables Portfolio Standard Verification Results* for the POU's identified in Attachment A hereto and authorizes the Executive Director, or his designee, to finalize the reports as California Energy Commission adopted reports, including making any necessary minor typographical edits, and distribute and post on the California Energy Commission website as necessary; and

FURTHER BE IT RESOLVED, that documents and other materials that constitute the proceeding record can be found at the California Energy Commission, 715 P Street, Sacramento, California, 95814 in the custody of the Docket Unit and online in

[Docket Number 24-RPS-01](https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-RPS-01),

<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-RPS-01>.

APPROVED AND ADOPTED this 19th day of October 2026, by the following vote:

AYE:

NAY:

ABSENT:

ABSTAIN:

CERTIFICATION

The undersigned Secretariat to the CEC does hereby certify that the foregoing is a full, true, and correct copy of a resolution duly and regularly approved and adopted by the affirmative vote of the CEC at a meeting held on October 19, 2026.

Kim Todd
Secretariat

Memorandum

To: Docket 24-RPS-01

From: **Josey Crosby, Attorney**
California Energy Commission
715 P Street

Sacramento, California 95814

Date: October 6, 2026

Subject: Basis for Finding that the *California Energy Commission Staff Draft Report Renewables Portfolio Standard Verification Results* are not a project, but if they were, they would still be exempt from the California Environmental Quality Act (CEQA) under the Commonsense Exemption

I. CEQA

The California Environmental Quality Act (Public Resources Code, sections 21000 *et seq.*; see also CEQA Guidelines, California Code of Regulations, Title 14, sections 15000 *et seq.*) requires that state agencies consider the environmental impact of their discretionary decisions. CEQA allows for certain projects to be exempted from its requirements. Of relevance here, and discussed further below, is the commonsense exemption. (California Code of Regulations, Title 14, section 15061(b)(3)).

II. Background and Proposed Action

The California Energy Commission (CEC) administers the state's landmark Renewables Portfolio Standard (RPS), ensures the state's utilities disclose electricity sources to consumers, supports renewable energy development, and tracks the state's progress toward its renewable energy goals. The CEC verifies the eligibility of renewable energy procured by load serving entities, which include retail sellers and local publicly owned electric utilities (POUs) that are obligated to participate in California's RPS. The CEC is also responsible for certifying RPS-eligible renewable energy resources, designing and implementing an accounting system to track and report renewable energy procurement for all program participants, and overseeing compliance and enforcement of POUs. The CEC participated in the development of the Western Renewable Energy Generation Information System (WREGIS), an independently administered renewable energy tracking system to verify renewable energy procurement for all program participants. The California Public Utilities Commission is responsible for compliance and enforcement for retail sellers.

As part of the verification process, Public Resources Code section 399.25(b) requires the CEC to prepare Renewables Portfolio Standard Verification Results Reports finding that the procurement claim amounts listed are consistent with RPS certification and procurement requirements specified in the *Renewables Portfolio Standard Eligibility Guidebook* (*RPS Eligibility Guidebook*) and the *Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities* (*RPS POU Regulations*) and are eligible for the RPS

program as indicated. These results reports are issued for each POU and adopted by the CEC at a regularly scheduled business meeting.

CEC staff have prepared Compliance Period 4 (2021-2024) verification results reports for 18 Group 2 POUs, titled the *California Energy Commission Staff Draft Report Renewables Portfolio Standard Verification Results*, which include the verification findings for these 18 POUs. A total of 43 POUs reported claims for CP 4. Staff previously completed claims verification for 25 POUs, which were based on verification results reports adopted at a publicly noticed business meeting on May 13, 2026. The CEC is considering adopting the 18 verification results reports at the October 19, 2026, CEC business meeting.

III. The proposed verification results reports are not a project.

A project under CEQA is defined as the “whole of an action which has a potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment.” (California Code of Regulations, Title 14, section 15378(a)).

The CEC prepares Renewables Portfolio Standard verification results reports on its findings on the amount of eligible renewable energy procured each compliance period by POUs subject to California’s RPS. The adoption of these findings does not impose any new requirements on POUs and is determined through a process based on the requirements specified in the *RPS Guidebook* and *RPS POU Regulations*. Therefore, the proposed verification results reports have no potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment. Accordingly, the verification results reports do not meet the definition of a project under CEQA, and therefore, the CEC is not obligated to meet the CEQA requirements that apply to projects.

IV. Even if the verification results reports were considered a project, they are exempt from CEQA under the Common Sense Exemption.

If the verification results reports were a project, the action would still be exempt from CEQA under the common sense exemption. CEQA only applies to projects that have the potential to cause a significant effect on the environment. (California Code of Regulations, Title 14, section 15061(b)(3)). A “significant effect on the environment” is defined as a substantial, or a potentially substantial, adverse change in the environment, and does not include an economic change by itself. (Public Resources Code, section 21068; California Code of Regulations, Title 14, section 15382).

As detailed above, the purpose of the verification results reports is to simply approve findings on whether the procurement claim amounts listed are consistent with RPS certification and procurement requirements and are eligible for the RPS program as indicated. It can be seen with reasonable certainty that the verification results reports will not have a significant effect on the environment.

V. Conclusion

As shown above, it can be seen with reasonable certainty that the verification results reports are not a project, as they have no potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment. In the

case that the 18 verification results reports were to be a project, they would not have a significant effect on the environment and, therefore, they are exempt pursuant to the common sense exemption under California Code of Regulations, Title 14, section 15061(b)(3).

ATTACHMENT A

Biggs Municipal Services
City of Burbank
City of Colton
City of Needles
City of Shasta Lake
Eastside Power Authority
Glendale Water and Power
Gridley Electric Utility
Imperial Irrigation District
Kirkwood Meadows PUD
Lassen Municipal Utility District
Los Angeles Department of Water and Power
Merced Irrigation District
Modesto Irrigation District
Pasadena Water and Power
San Francisco Public Utilities Commission
Silicon Valley Power
Truckee Donner Public Utility District