



**California Energy Commission
June 22, 2026, Business Meeting Backup Materials for
Renewables Portfolio Standard 2021-2024 Retail Sellers Procurement Verification
Report**

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

1. CEQA Memo, attached below.
2. Proposed Resolution, attached below.
3. Resolution, posted immediately after business meeting approval.
4. The *Renewables Portfolio Standard 2021-2024 Retail Sellers Procurement Verification Staff Draft Report*, posting date was June 05, 2026, at [Energy Commission 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>.

For the complete record, please visit: [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>

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.

Memorandum

To: Docket 24-RPS-01

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

Sacramento, California 95814

Date: June 10, 2026

Subject: Basis for Finding that the *California Energy Commission Renewables Portfolio Standard 2021-2024 Retail Sellers Procurement Verification Report Staff Draft Report* (Verification Report) is not a project, but if it was, it would still be exempt from the California Environmental Quality Act (CEQA) under the Common Sense 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. An action that is not a project is not subject to CEQA. (California Code of Regulations, Title 14, section 15060(c)). Furthermore, CEQA provides several exemptions for certain actions that do constitute a project. Of relevance here, and discussed further below, is the Common Sense 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 (CPUC) 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 the Verification Report 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. This Verification Report is issued for all retail sellers and adopted by the CEC at a regularly scheduled business meeting. The CEC then transmits the Verification Report to the CPUC, so the CPUC may determine a retail seller's compliance with California's RPS.

CEC staff have prepared the Compliance Period 4 (2021-2024) Verification Report, titled the *California Energy Commission Renewables Portfolio Standard 2021-2024 Retail Sellers Procurement Verification Staff Draft Report*, which includes the verification findings for all of the retail sellers. The CEC is considering adopting the Verification Report at the June 22, 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 the Verification Report on its findings on the amount of eligible renewable energy procured each compliance period by retail sellers subject to California's RPS. The adoption of these findings does not impose any new requirements on retail sellers and is determined through a process based on the requirements specified in the *RPS Eligibility Guidebook*. Therefore, the proposed Verification Report has 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 Report does 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 Report was considered a project, it is exempt from CEQA under the Common Sense Exemption.

If the Verification Report was 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 Report 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 Report will not have a significant effect on the environment.

V. Conclusion

As shown above, it can be seen with reasonable certainty that the Verification Report is not a project, as it has 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 Verification Report was to be a project, it would not have a significant effect on the environment and, therefore, it is exempt pursuant to the Common Sense Exemption under California Code of Regulations, Title 14, section 15061(b)(3).

CALIFORNIA ENERGY COMMISSION

**PROPOSED RESOLUTION: RESOLUTION ADOPTING RENEWABLES PORTFOLIO
STANDARD 2021-2024 RETAIL SELLERS PROCUREMENT VERIFICATION
REPORT 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, 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 (CPUC), has adopted guidelines, as set forth in the *Renewables Portfolio Standard Eligibility Guidebook, (RPS Eligibility Guidebook)*, addressing its verification responsibilities under Public Utilities Code Section 399.25(b) as well as other provisions of California’s RPS law, and has further clarified the process used to conduct its RPS verification in the *Renewables Portfolio Standard Verification Methodology Report, Fourth Edition*; and

WHEREAS, in furtherance of Public Utilities Code Section 399.25(b), the California Energy Commission prepares the *Renewables Portfolio Standard 2021–2024 Retail Sellers Procurement Verification Staff Draft Report* to report its findings on the amount of eligible renewable energy procured each year by retail sellers, subject to California’s RPS under Public Utilities Code Section 399.11, et seq.; and

WHEREAS, the Verification Report applies the statutory requirements in the Public Utilities Code, the requirements specified in the *RPS Eligibility Guidebook*, and the CPUC’s adopted RPS program rules in determining the amount of renewable energy procurement that qualifies toward each retail seller’s RPS procurement requirements; and

WHEREAS, the California Energy Commission transmits the *Renewables Portfolio Standard 2021–2024 Retail Sellers Procurement Verification Staff Draft Report* to the CPUC, so the CPUC may determine a retail seller’s compliance with California’s RPS; and

WHEREAS, California Energy Commission staff has prepared the draft Verification Report for calendar years 2021-2024, titled the *Renewables Portfolio Standard 2021–2024 Retail Sellers Procurement Verification Staff Draft Report*; and

WHEREAS, California Energy Commission staff published the *Renewables Portfolio Standard 2021–2024 Retail Sellers Procurement Verification Staff Draft Report* along

with a Notice of Availability and Request for Comments to the RPS Compliance Period 4 (2021 - 2024) Verification and Compliance docket (24-RPS-01) on June 05, 2026 for a 10-day comment period; and

WHEREAS, the scope of the *Renewables Portfolio Standard 2021–2024 Retail Sellers Procurement Verification Staff Draft Report* includes RPS procurement verification findings for 50 retail sellers, including three investor-owned utilities, three small and multi-jurisdictional utilities, 17 electric service providers, and 27 community choice aggregators; and

WHEREAS, 43 retail sellers served electricity customer loads and reported procurement claims for this compliance period. Seven retail sellers did not report procurement claims due to either no longer serving load or not planning to serve load in Compliance Period 4; however, they were still registered as retail sellers with the CPUC at the time of this report.

WHEREAS, the *Renewables Portfolio Standard 2021–2024 Retail Sellers Procurement Verification Staff Draft Report* addresses the following items with respect to each of the 43 retail sellers:

- Verifies, RPS-eligibility of the renewable energy resources (i.e., electrical generation facilities) from which each reporting retail seller has claimed renewable energy procurement;
- Verifies, that the amount of renewable energy procurement claimed by each retail seller was sufficiently generated by each RPS-eligible electrical generation facility;
- Verifies, that the claimed RPS procurement exclusively serves California’s RPS and does not support another renewable energy regulatory or voluntary market claim;
- Identifies the eligible, ineligible, and/or withdrawn RPS procurement claims per retail seller and provides the total amount of eligible RPS procurement; and
- Provides analysis of RPS-eligible procurement by resource type.

WHEREAS, California Energy Commission staff has considered the application of the California Environmental Quality Act (CEQA) to this item and determined that the adoption of the *Renewables Portfolio Standard 2021–2024 Retail Sellers Procurement Verification Staff Draft Report* 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, THE CALIFORNIA ENERGY COMMISSION FINDS:**

With regard to CEQA:

The CEC has considered the application of CEQA and concluded that, on the basis of the entire record before it, the CEC hereby adopts staff's finding that the *Renewables Portfolio Standard 2021–2024 Retail Sellers Procurement Verification Staff Draft Report* is not a "project" as it is not an activity that has the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. Even if it was a project, it is exempt from CEQA pursuant to the "Common Sense Exemption" (CEQA Guidelines, § 15061, subd. (b)(3)) because it can be seen with certainty that there is no possibility that the activity will have a significant effect on the environment; and

THEREFORE, BE IT RESOLVED, the California Energy Commission has considered and hereby adopts the *Renewables Portfolio Standard 2021–2024 Retail Sellers Procurement Verification Staff Draft Report* and directs the Executive Director, or their designee, to finalize the report, including making any necessary typographical or non-substantive changes, and transmit it to the CPUC.

FURTHER BE IT RESOLVED, that documents and other materials that constitute the entire record of this approval can be found at the CEC, 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>.

CERTIFICATION

The undersigned Secretariat to the California Energy Commission does hereby certify that the foregoing is a full, true, and correct copy of a resolution duly and regularly adopted at a meeting of the California Energy Commission held on June 22, 2026.

AYE:
NAY:
ABSENT:
ABSTAIN:

Dated:

Kim Todd
Secretariat

CALIFORNIA ENERGY COMMISSION

715 P Street
Sacramento, California, 95814

energy.ca.gov

CEC-70 (Revised 2/26)



IN THE MATTER OF:

*Renewables Portfolio Standard
Compliance Period 4 (2021-2024)
Verification and Compliance*

DOCKET NO. 24-RPS-01

NOTICE OF PROPOSED ADOPTION AT JUNE
BUSINESS MEETING

RE: Adoption of the *Renewables Portfolio
Standard 2021-2024 Retail Sellers
Procurement Verification Staff Draft Report
for Compliance Period 4*

**Notice to Consider Adoption of *Renewables Portfolio
Standard 2021-2024 Retail Sellers Procurement
Verification Staff Draft Report For
Compliance Period 4***

June 22, 2026

10:00 a.m.

In-person at: California Natural Resources Building
715 P Street, First Floor Auditorium
Sacramento, CA 95814
(Wheelchair Accessible)

Remote Access via Zoom

As part of the June 22, 2026, Business Meeting, the Energy Commission will consider adoption of the *Renewables Portfolio Standard 2021-2024 Retail Sellers Procurement Verification Staff Draft Report (Verification Report)*.

More information about the June 22, 2026, Business Meeting, including the full agenda, location, and instructions for participation is available on the CEC's website at <https://www.energy.ca.gov/proceedings/business-meetings>.

Background

The proposed *Verification Report* details verification findings of renewable energy procurement claims submitted by retail sellers for Compliance Period 4 (CP 4) of the Renewables Portfolio Standard (RPS),

covering the years 2021-2024.

As part of its administrative responsibility, the CEC verifies the RPS procurement claims of both retail sellers and local publicly owned electric utilities (POU). The methods used by the CEC to verify procurement claims for CP 4 RPS program participants are generally described in the *Renewables Portfolio Standard Eligibility Guidebook* and further detailed in the *Renewables Portfolio Standard Verification Methodology Report, Fourth Edition*. These [documents](https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard) can be found at <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard>.

As stated, the *Verification Report* applies to retail sellers, which included three large investor-owned utilities (IOU), three small and multijurisdictional utilities (SMJU), 17 electric service providers (ESP), and 27 community choice aggregators (CCA). 43 retail sellers served electricity customer loads and reported procurement claims for this compliance period. Seven retail sellers did not report procurement claims due to either no longer serving load or not planning to serve load in CP 4; however, they were still registered as retail sellers with the CPUC at the time of this report. The verification results included in the *Verification Report* provides the following information for the 43 California retail sellers that reported procurement claims for CP 4:

- Total RPS claims reports (2021-2024).
- Ineligible claims, distinguished by the reason for the ineligible finding.
- Withdrawn claims.
- Claims eligible toward the RPS.

The report also provides an analysis of the total eligible procurement claims by resource type and includes each individual retail seller's Summary Claims Reports.

On June 05, 2026, the *Verification Report* was posted for public comment, with written comments due June 19, 2026. Staff will consider the comments received and update the *Verification Report* as needed. The *Verification Report* is available at <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-RPS-01>.

Public Comment.

More information about the June 22, 2026, Business Meeting, including the full agenda, location, and instructions for participation including public comment, is available on the CEC's website at <https://www.energy.ca.gov/proceedings/business-meetings>.

Remote Access Information for Business Meetings

Zoom

- **To participate by telephone: Dial** (213) 338-8477 or (888) 475-4499 (toll free) and enter Webinar ID: 886 5692 5780.
- **To view and listen:** <https://energy.zoom.us/j/88656925780?pwd=py3OLuObci5rwPpagkvKQ6I1hefubk.1>
- You may also access Zoom at <https://join.zoom.us>. Enter event number **886 5692 5780**. The meeting password is **energy**. Zoom technical support is available at 1-888-799-9666 ext. 2.
- Public comment will be conducted through Zoom. When on the Zoom platform, press the "raise hand" feature to indicate you would like to make a comment. To raise your hand by phone, press *9 and then *6 to unmute. The Public Advisor will call on you and open your line. Before making your comment, restate and spell your name, indicate your affiliation, if

any.

Public Advisor. The CEC’s Public Advisor assists the public with participation in CEC proceedings. To request assistance, interpreting services, or reasonable modifications and accommodations, call (916) 957-7910 or email publicadvisor@energy.ca.gov as soon as possible but at least five days in advance of the workshop. The CEC will work diligently to meet all requests based on availability.

Media Inquiries. Email mediaoffice@energy.ca.gov or call (916) 654-4989.

Technical Subject Inquiries. Email CEC Staff at RPSTrack@energy.ca.gov or call (916) 653-6222.

General Inquiries: Email CEC Staff at RPSTrack@energy.ca.gov or call (916) 653-6222.

Dated: XXXX XX, 2026, in Sacramento, California.

Regina Galer
Deputy Director, Siting, Transmission and Environmental Protection Division

Subscriptions:
General Renewable Energy Info and CEC Renewable Energy Programs