

## **Renewables Portfolio Standard Reporting Year 2023 Annual Reporting Instructions**

The California Energy Commission's (CEC) Renewables Portfolio Standard (RPS) reporting deadline for retail sellers and local publicly owned electric utilities (POU), collectively known as load-serving entities (LSE), is **Monday, July 1, 2024**. The reporting requirements require each entity to submit their 2023 Western Renewable Energy Generation Information System (WREGIS) annual reports with supporting documentation.

The following instructions summarize the 2023 annual reporting requirements that must be submitted by this reporting deadline. These instructions are divided into three sections:

- I. Annual Reporting Requirements for all LSEs
- II. Annual Reporting Requirements for all POUs
- III. Annual Reporting Requirements for POUs Using Exemptions and Adjustments

### **I. Annual Reporting Requirements for All LSEs**

#### **1. WREGIS State/Provincial/Voluntary Compliance Report (WREGIS Report)**

For RPS claims retired for reporting year 2023, the LSE must authorize WREGIS to email the WREGIS Report to the CEC. See [2023 WREGIS Reporting Guidance](#).

#### **2. Attestation for WREGIS Report(s)**

For WREGIS Reports submitted for 2023, the LSE must submit an attestation in the [RPS Online System](#). The LSE will receive an attestation request notification when the WREGIS Report has been uploaded.

#### **3. WREGIS Adjustment**

LSEs may report generation that meets the requirements specified in the [Renewables Portfolio Standard Eligibility Guidebook, Ninth Edition, \(Revised\)](#) (RPS Eligibility Guidebook) through a WREGIS Adjustment. To request a WREGIS Adjustment, the LSE must complete the required information in the [RPS Online System](#). Following the CEC review, the LSE will receive notification of the approval or disapproval of the request through the [RPS Online System](#).

### **II. Annual Reporting Requirements for All POUs**

#### **1. Annual Summary Report and Supporting Documentation**

The CEC is mandated to verify POU compliance with the RPS procurement requirements, as specified in [The Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities](#) (RPS POU Regulations). To demonstrate compliance with these requirements, POUs shall report general procurement and contractual information using the [RPS Online System](#). POUs must complete and attest to the Annual Summary Report in the [RPS Online System](#). Further information on the requirements for annual summary reporting is provided in the [RPS Eligibility Guidebook](#).

**2. New and Amended POU Contract Data and Documents**

POUs must enter the required data about all new and amended contracts and ownership agreements executed during the prior year. POUs should upload all required documents and attest to the information in the [RPS Online System](#). **Please note, POUs reporting supporting contract data for contracts or resale agreements with a joint powers authority (JPA) or third-party supplier pursuant to section 3204 (d)(2)(B)2., may submit a [JPA/Third-Party Supplier Contract – POU Attestation form](#).**

**3. New, Amended, or Modified POU Contract or Resale Agreement with a JPA or Third-Party Supplier that Include Both Short-Term and Long-Term Underlying Resources**

Consistent with the CEC guidance provided in [the regulatory advisory](#) clarifying the classification of a POU contract or resale agreement with a JPA or third-party supplier containing both short-term and long-term underlying resources, POUs shall identify and report to the CEC any new, amended, or modified contracts from the previous year that contain both short-term and long-term underlying resources. POUs with these contracts should not complete and submit the [JPA/Third-Party Supplier Contract – POU Attestation form](#), as referenced above. Instead, POUs with new, amended, or modified contracts meeting the criteria described in the regulatory advisory on this topic shall submit the contracts in [RPS Online System](#) by marking the contract as Seller Type “Third-Party Supplier,” filling out all the information prompted, and providing documentation showing a long-term commitment by the JPA or third party with the RPS-certified facility. It is the POU or reporting entity’s responsibility to indicate which contracts are associated with a mix of long- and short-term resources with RPS-certified facilities and to provide proof of the JPA or third-party seller’s ownership of, or long-term underlying procurement contracts with, the underlying RPS-certified facilities with which the POU has entered a long-term procurement commitment. If you need additional guidance on how to report these contracts, please send an email requesting assistance to the CEC staff at [RPSTrack@energy.ca.gov](mailto:RPSTrack@energy.ca.gov).

**4. Newly Executed POU Prepayment Transactions Tied to an Existing PCC 0 or PCC 1 Contract**

POUs who entered a prepayment transaction or transactions tied to an existing Portfolio Content Category (PCC) 0 or PCC 1 contract in the previous year shall provide the CEC the following documentation associated with the prepayment transaction: the Limited Assignment Agreement; Electricity Purchase, Sale, and Service Agreement; Master Power Supply Agreement; and Clean Energy Purchase Contract (or their equivalents). POUs with these arrangements shall send the above documentation along with a summary of the prepayment transaction to the CEC at [RPSTrack@energy.ca.gov](mailto:RPSTrack@energy.ca.gov).

**5. Voluntary Request for Early Review of Contracts**

POUs may request voluntary early review of certain contracts executed on or after July 1, 2020, to determine if the contract qualifies as a long-term contract under the RPS POU Regulations as described in the [Instructions and Checklist for Voluntary Early Review of a Contract](#). **Contracts must meet the eligibility requirements listed in the**

**Instructions and Checklist for Voluntary Early Review of a Contract to qualify for this early review provision.**

**6. e-Tag Reporting**

POUs with PCC 1 claims and/or PCC 2 claims from facilities outside a California Balancing Authority (CBA) are required to submit an e-Tags Report to report e-Tags that are matched with claims in the Compliance Report (WREGIS Report). **For the 2023 reporting year, the CEC prefers POUs with PCC 1 and/or PCC 2 claims from non-CBA facilities submit their e-tags to the CEC using Option #2 below, using the CEC's ["e-Tag Report Form"](#) (Schedule 3 Form) following the CEC's [e-tag Report Instructions](#).**

Options for submitting e-tags to the CEC include:

Option 1: For e-Tag data available in WREGIS, POUs must associate e-Tags in the subaccount with the corresponding claim and authorize WREGIS to submit the California e-Tags Report to the CEC. Additional information on completing this process is available in the [2023 WREGIS Reporting Guidance](#).

Option 2: For e-Tag data not available in WREGIS, POUs must complete and attest to the e-Tag Report in the [RPS Online System](#). POUs can enter data or upload the data directly into the system using the [e-Tag Report Form](#) (Schedule 3 Form) template, found on the [RPS Verification and Compliance](#) webpage.

**7. Hourly Report**

For PCC 1 claims of energy scheduled into California from outside of a CBA, POUs must complete and attest to the [Schedule 4 – Annual Hourly Comparison for POU PCC 1 Claims of Generation Scheduled into a CBA](#) in the [RPS Online System](#), and on the [RPS Verification and Compliance](#) webpage.

**III. Annual Reporting Requirements for POUs Using Exemptions and Adjustments**

**1. POUs with Qualifying Large Hydroelectric Generation**

POUs with qualifying large hydroelectric generation meeting the criteria of Public Utilities Code section 399.30 (k) reporting generation for Compliance Period 4 should notify RPS staff by sending an email to [RPSTrack@energy.ca.gov](mailto:RPSTrack@energy.ca.gov).

POUs should refer to Section 3204 (b)(8) related to qualifying large hydroelectric generation in the RPS POU Regulations.

Upon receipt of notification, RPS staff will enable the data fields within the Annual Summary Report to allow POUs' representatives to report the claim amounts and supplemental narrative information in the [RPS Online System](#).

**2. POUs with Voluntary Green Pricing Programs**

POUs with a voluntary green pricing program (GPP) or shared renewable generation program reporting generation to be excluded from its 2023 retail sales, in accordance

with Public Utilities Code section 399.30 (c)(4), should notify RPS staff by sending an email to [RPSTrack@energy.ca.gov](mailto:RPSTrack@energy.ca.gov). POU's should also review to Section 3204 (b)(9) of the RPS POU Regulations related to voluntary green pricing program generation exclusion to ensure their program meets all applicable requirements.

Upon receipt of notification, the CEC will enable data fields within the Annual Summary Report to allow POU's' representatives to report the claim amounts for exclusion and supplemental narrative information demonstrating that claim amounts for exclusion meet all requirements of section 3204 (b)(9)(B). POU's may use either the "POU Contracts" reporting function or identify existing reported contracts supporting claims for GPP adjustments as "Other Narratives" in the [RPS Online System](#).

**3. POU's Meeting the Criteria of Public Utilities Code section 399.18**

POU's meeting these criteria should notify the CEC by sending an email to [RPSTrack@energy.ca.gov](mailto:RPSTrack@energy.ca.gov). POU's should also review Section 3204 (b)(5) of the RPS POU Regulations related to this exemption to ensure their POU meets all applicable requirements.

Upon receipt of notification, the CEC will enable fields within the Annual Summary Report to allow POU's' representatives to report the claim amounts for exclusion and supplemental narrative information in the [RPS Online System](#).