## Renewables Portfolio Standard

## Reporting Year 2024 Annual Reporting Instructions

The California Energy Commission’s (CEC) 2024 Renewables Portfolio Standard (RPS) reporting is now available in the RPS Online System. The deadline for Retail Sellers and local Publicly Owned electric Utilities (POU), collectively known as load-serving entities (LSE), is **Tuesday, July 1, 2025**.

Please note, in an effort to expedite the verification process, the CEC is moving towards a first-come, first-served approach to verification. All LSEs are encouraged to submit reports timely, and, when possible, before the due date to allow staff to more efficiently respond to submissions.

The reporting requirements require each entity to submit their 2024 Western Renewable Energy Generation Information System (WREGIS) annual reports with supporting documentation. The following instructions summarize the 2024 annual reporting requirements that must be submitted by this reporting deadline. These instructions are divided into three sections:

1. Annual Reporting Requirements for all LSEs
2. Annual Reporting Requirements for all POUs
3. Annual Reporting Requirements for POUs Using Exemptions and Adjustments
4. **Annual Reporting Requirements for All LSEs**
5. **WREGIS State/Provincial/Voluntary Compliance Report (WREGIS Report)**

For retired 2024 RPS claims, the LSE must authorize WREGIS to email the WREGIS Report to the CEC. See [2024 WREGIS Reporting Guidance](https://www.energy.ca.gov/media/11289).

1. **Attestation for WREGIS Report(s)**

For 2024 WREGIS Reports, the LSE must submit an attestation in the [RPS Online System](https://rps.energy.ca.gov/Login.aspx). The LSE will receive an attestation request notification when the WREGIS Report has been uploaded.

1. **WREGIS Adjustment**

LSEs may report generation that meets the requirements specified in the [*Renewables Portfolio Standard Eligibility Guidebook, Ninth Edition, (Revised)*](https://efiling.energy.ca.gov/getdocument.aspx?tn=217317) (*RPS Eligibility Guidebook*) through a WREGIS Adjustment. To request a WREGIS Adjustment, the LSE must complete the required information in the [RPS Online System](https://rps.energy.ca.gov/Login.aspx). Following the CEC review, the LSE will receive notification of the approval or disapproval of the request through the [RPS Online System](https://rps.energy.ca.gov/Login.aspx).

1. **Annual Reporting Requirements for All POUs**
2. **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*](https://www.energy.ca.gov/sites/default/files/2021-09/Final%20Regulations%20w.o.%20underline%20strikethrough%209.22_ADA.pdf)(*RPS POU Regulations*). To demonstrate compliance with these requirements, POUs shall report general procurement and contractual information using the [RPS Online System](https://rps.energy.ca.gov/). POUs must complete and attest to the Annual Summary Report in the [RPS Online System](https://rps.energy.ca.gov/Login.aspx). Further information on the requirements for annual summary reporting is provided in the [*RPS Eligibility Guidebook*](https://efiling.energy.ca.gov/getdocument.aspx?tn=217317).

1. **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](https://rps.energy.ca.gov/Login.aspx). **Please note, POUs reporting supporting contract data for contracts or resale agreements with a joint powers authority (JPA) or third-party supplier pursuant to the *RPS POU Regulations* Section 3204 (d)(2)(B)2., may submit a** [**JPA/Third-Party Supplier Contract – POU Attestation form**](https://www.energy.ca.gov/media/5882).

1. **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](https://www.energy.ca.gov/media/7286) 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**](https://www.energy.ca.gov/media/5882)**,** 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](https://rps.energy.ca.gov/Login.aspx) 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.

1. **Newly Executed POU Prepayment Transactions Tied to an Existing Portfolio Content Category (PCC) 0 or PCC 1 Contract**

Consistent with the CEC guidance provided in [the regulatory advisory](https://www.energy.ca.gov/sites/default/files/2024-12/Regulatory_Advisories_Dec_2024_ada.pdf) clarifying prepayment transactions under the *RPS POU Regulations*, POUs who entered a prepayment transaction or transactions tied to an existing 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.

1. **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](https://www.energy.ca.gov/media/6993). **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.**

1. **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 that are matched with claims in the Compliance Report (WREGIS Report). POUs must submit e-Tag submittals but not the hourly form for Pseudo-Tie and Dynamic Scheduling arrangements. **For the 2024 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 #1 below, using the CEC’s** [**“e-Tag Report Form”**](https://www.energy.ca.gov/media/4084) **(Schedule 3 Form) following the CEC’s** [**e-tag Report Instructions**](https://www.energy.ca.gov/media/4082)**.**

Options for submitting e-Tags to the CEC include:

Option 1: For e-Tag data not available in WREGIS, POUs must complete and attest to the e-Tag Report in the [RPS Online System.](https://rps.energy.ca.gov/Login.aspx) POUs can enter data or upload the data directly into the system using the [e-Tag Report Form](https://www.energy.ca.gov/media/4084)(Schedule 3 Form)template, found on the [RPS Verification and Compliance webpage](https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard).

Option 2: 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 [2024 WREGIS Reporting Guidance](https://www.energy.ca.gov/media/11289).

1. **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](https://www.energy.ca.gov/media/4085) in the [RPS Online System](https://rps.energy.ca.gov/), and on the [RPS Verification and Compliance webpage](https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard).

1. **Annual Reporting Requirements for POUs Using Exemptions and Adjustments**
2. **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. 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](https://rps.energy.ca.gov/).

1. **POUs with Voluntary Green Pricing Program (GPP) or Shared Renewable Generation Program**

POUs with a voluntary GPP or shared renewable generation program reporting generation to be excluded from its 2024 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. POUs should also review 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 POUs’ 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) of the *RPS POU Regulations*. POUs 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](https://rps.energy.ca.gov/).

1. **POUs with Qualifying Coal-fired Generation Procurement**

POUs with qualifying procurement from coal-fired generation meeting the criteria of Public Utilities Code Section 399.30 (l)(1)(A) reporting procurement for Compliance Period 4 should notify RPS staff by sending an email to RPSTrack@energy.ca.gov. In addition to sending an email to RPSTrack@energy.ca.gov, within the Annual Summary Report, POU representatives should report the following information as a supplemental narrative in the [RPS Online System](https://rps.energy.ca.gov/Login.aspx):

* 1. The total quantity, in MWh, of qualifying procurement of coal-fired generation procured by the POU during Compliance Period 4. CEC staff prefer/request that POUs report the *annual* quantity of qualifying coal generation MWhs for each year so that the MWhs sum up to the total quantity of MWhs for the entire compliance period.
	2. A copy of the POU’s procurement contract or ownership agreement for the qualifying procurement of coal-fired generation.
	3. A copy of the POU’s renewable energy resources procurement plan, if not previously provided to the CEC, demonstrating that the POU met the requirements of *RPS POU Regulation*s Section 3204 (b)(10)(B).
1. **POUs Meeting the Criteria of** [**Public Utilities Code Section 399.18**](https://california.public.law/codes/ca_pub_util_code_section_399.18)

POUs meeting these criteria should notify the CEC by sending an email to RPSTrack@energy.ca.gov. POUs 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 POUs’ representatives to report the claim amounts for exclusion and supplemental narrative information in the [RPS Online System](https://rps.energy.ca.gov).