

# **Renewables Portfolio Standard**

## **Compliance Period 5 Annual Reporting Instructions**

The California Energy Commission's (CEC) Renewables Portfolio Standard (RPS) reporting is 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 **July 1 of each year following the compliance period year**. If the due date falls on a weekend or state holiday, the due date becomes the next business day. These annual reporting instructions have been updated to include each individual year of Compliance Period 5.

- The 2025 reporting year is due July 1, 2026
- The 2026 reporting year is due July 1, 2027
- The 2027 reporting year is due July 3, 2028

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 Western Renewable Energy Generation Information System (WREGIS) annual reports with supporting documentation. The following instructions summarize the annual reporting requirements that must be submitted by the July 1 reporting deadline for each reporting year, as listed above. 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)**

- a. For retired RPS claims, the LSE must authorize WREGIS to email the WREGIS Report to the CEC. See [WREGIS Reporting Guidance](#).

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

- b. For annual WREGIS Reports for the current reporting year, 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**

- c. LSEs may report generation that meets the requirements specified in the

[Renewables Portfolio Standard Eligibility Guidebook, Tenth Edition](#) (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 POU

### 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, POU shall report general procurement and contractual information using the RPS Online System. POU 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. POU should upload all required documents and attest to the information in the [RPS Online System](#). **Please note, POU 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](#).**

### 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, POU 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. POU with these contracts **should not** complete and submit the **JPA/Third-Party Supplier Contract – POU Attestation form**, as referenced above. Instead, POU with new, amended, or modified contracts meeting the criteria described in the regulatory advisory on this topic shall submit the contracts in the [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 Portfolio Content Category (PCC) 0 or PCC 1 Contract**

Consistent with the CEC guidance provided in [the regulatory advisory](#) 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](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-Tag Report that is matched with claims in the Compliance Report (WREGIS Report). Further information on e-Tag reporting requirements is provided in the [RPS Eligibility Guidebook](#).

**Option 1 CEC e-Tag Report Form (CEC preferred):**

POUs 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 following the [CEC e-Tag Report Instructions](#), found on the [RPS Verification and Compliance](#) webpage.

**Option 2 WREGIS Report Form:**

This option is only available for e-Tags in WREGIS. POUs 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 [WREGIS Reporting Guidance](#).

#### **7. Hourly Reporting**

For PCC 1 claims of energy scheduled into California from outside of a CBA, POUs must also complete and attest to the [Hourly Report Form \(Schedule 4 form\)](#) template [following the CEC Hourly Report Instructions](#) in the [RPS Online System](#), found 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 5 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 Program (GPP) or Shared Renewable Generation Program**

POUs with a voluntary GPP or shared renewable generation program reporting generation to be excluded from their annual Compliance Period 5 retail sales, in accordance with Public Utilities Code Section 399.30 (c)(4), should annually notify RPS staff by sending an email to [RPSTrack@energy.ca.gov](mailto: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](#).

#### **3. POUs with Qualifying Gas-Fired Generation Procurement**

POUs with qualifying procurement from gas-fired generation meeting the criteria of Public Utilities Code Section 399.33(a) should refer to Section 3204 (b)(11) of the RPS POU Regulations and submit documentation specified in Section 3207 (m) to the CEC no

later than the final reporting year (RY2027).

**4. POU Meeting the Criteria of [Public Utilities Code Section 399.18](#)**

POUs meeting these criteria should notify the CEC by sending an email to [RPSTrack@energy.ca.gov](mailto: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](#).