

<b>DOCKETED</b>	
<b>Docket Number:</b>	21-RPS-02
<b>Project Title:</b>	Renewables Portfolio Standard 10th Edition Guidebook Update
<b>TN #:</b>	266306
<b>Document Title:</b>	Presentation - Staff Workshop on the Draft Renewables Portfolio Standard 10th Edition Guidebook
<b>Description:</b>	N/A
<b>Filer:</b>	Rose Saga
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	10/3/2025 2:43:33 PM
<b>Docketed Date:</b>	10/3/2025



# **Renewables Portfolio Standard Eligibility Guidebook, 10<sup>th</sup> Edition – Draft**

Siting, Transmission, and Environmental Protection Division

October 6, 2025



# Meeting Purpose and Scope

- Enhance understanding of draft language changes for RPS Guidebook 10<sup>th</sup> Ed.
- Solicit feedback from stakeholders
  - Comment/Question opportunity after each subject area
  - General comments at the end

In Scope	Out of Scope
RPS Guidebook subject matter	WREGIS or RPS Online System Issues
Stakeholder and state impacts	Verification & Compliance Results
	Other RPS issues



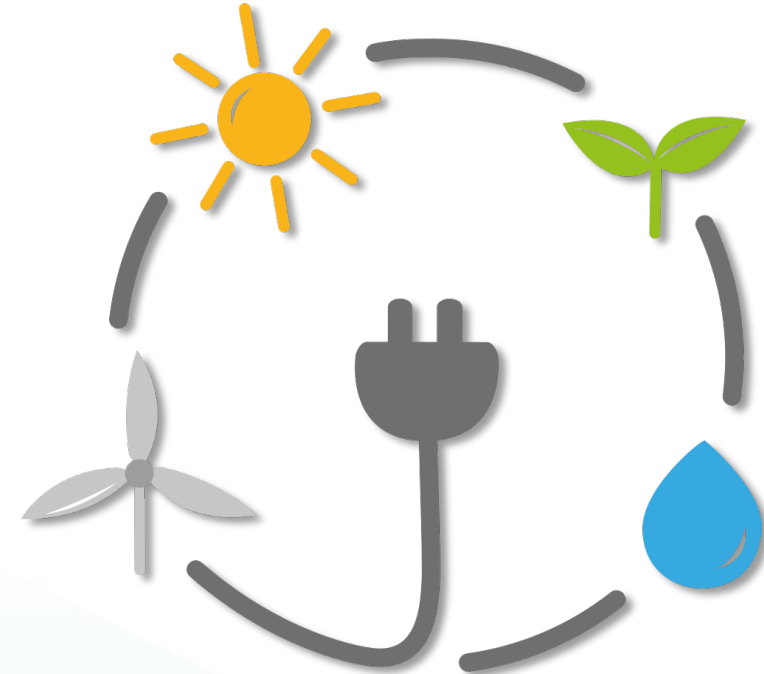
# Agenda

Time	Item
10:00am – 10:30am	<ul style="list-style-type: none"><li>• Overview/Logistics<ul style="list-style-type: none"><li>○ Meeting Purpose, Scope and Background Information</li><li>○ Opening Remarks</li><li>○ Public Participation</li></ul></li></ul>
10:30am – 12:30pm	<ul style="list-style-type: none"><li>• Proposed Updates (including public comment)<ul style="list-style-type: none"><li>1 – Document Formatting</li><li>2 – Location Eligibility</li><li>3 – Verification &amp; Compliance Updates</li><li>4 – Energy Storage</li><li>5 – Metering Requirements</li><li>6 – Distributed Generation</li><li>7 – Facilities with Air Permits</li><li>8 – Biomethane Delivery Requirements</li><li>9 – Linear Generators and Fuel Cells</li></ul></li><li>• Other Issues</li></ul>
12:30pm – 1:00pm	<ul style="list-style-type: none"><li>• Next Steps</li><li>• General Public Comment</li></ul>



# California's RPS

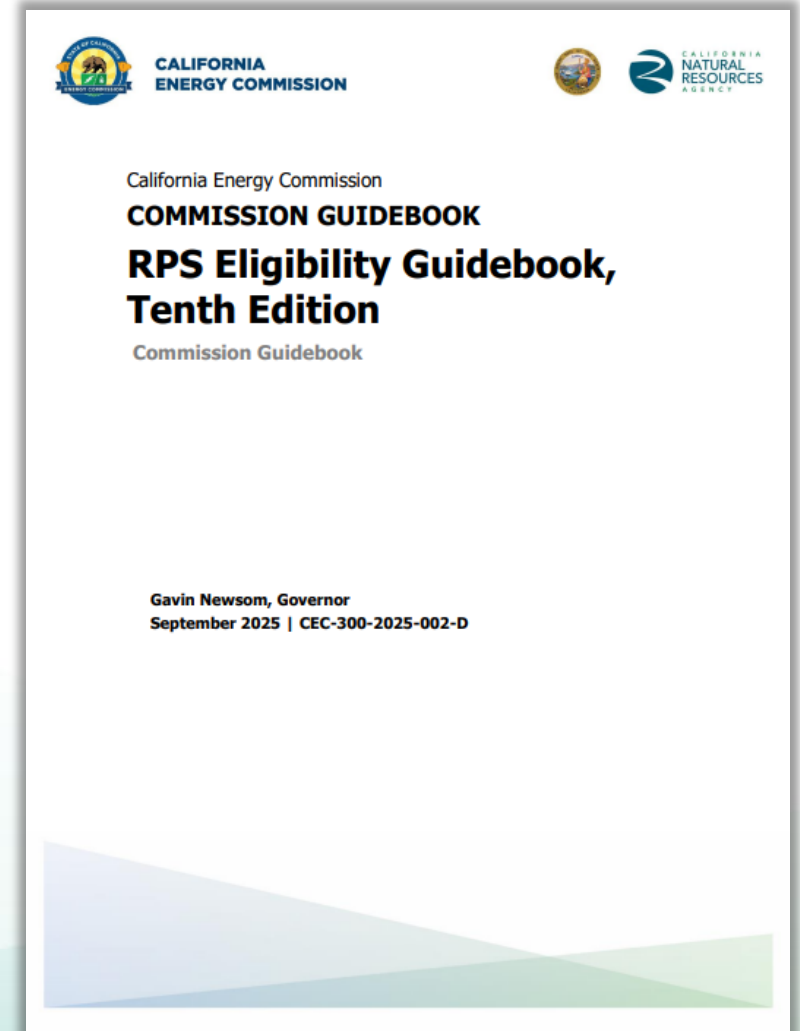
- Mandates state load-serving entities (LSE) to procure **renewable energy**
- **Procurement amounts** proportional to retail sales, measured in MWh
- Targets progressively increase to **60% in 2030** and beyond
- Many different **renewable resource types** are eligible





# The Eligibility Guidebook

- RPS facility certification requirements
- RPS eligible renewable resource definitions
- Annual reporting requirements
- [RPS Eligibility Guidebook, 9<sup>th</sup> Edition \(Revised\)](#)





# Public Process to Date

Oct 2024

- Initial scope of proposed updates
- 21 public comments received

May 2025

- Workshop on proposed updates
- 18 public comments received

Sept 2025

- Draft 10<sup>th</sup> Edition RPS Guidebook

Oct 2025

- Workshop on Draft 10<sup>th</sup> Edition





# Opening Remarks





# Presentation Structure

## 1. Background

- Current requirements and relevant terminologies

## 2. Draft Language

- Summary of drafted changes

## 3. Rationale

- Elaboration on why/why not changes were made

## 4. Public Comment / Q&A

- Stakeholder feedback



# Participation

## 1. Webinar

- Being recorded via Zoom

## 2. Public Comment Options

- Use “raise hand” feature in Zoom
- Over telephone: dial \*9 to “raise hand” and \*6 to mute/unmute
- Type your question in the Q&A window

## 3. Written Comment

- Due by **October 20, 2025**
- Submit through the e-commenting system (**21-RPS-02**) at:  
<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=21-RPS-02>
- Subscribe to CEC General Renewable Energy Programs at:  
<https://public.govdelivery.com/accounts/CNRA/signup/31911>



# Public Comment / Questions

## Instruction

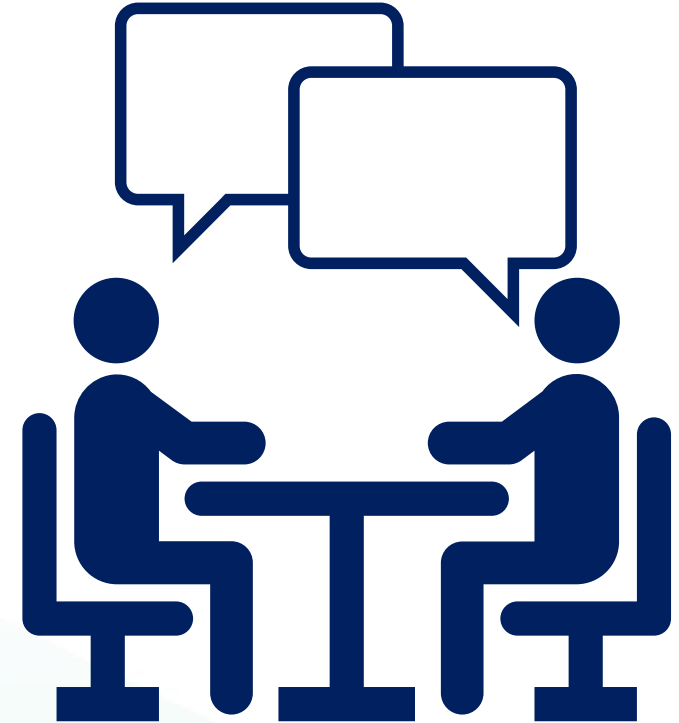
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# **Item 1: Document Formatting**



# Draft Language

Navigation pane functionality

Interactive Table of Contents

Updated information: WREGIS references,  
email options

Modified numbering list styles

Guidebook section reference / website  
hyperlinks

Modified heading style (ex: Chapter 1.1)



× Bookmarks

- ACKNOWLEDGEMENTS
- ABSTRACT
- › WHAT'S NEW IN THIS GUIDEBOOK?
- ACKNOWLEDGEMENTS
- TABLE OF CONTENTS
- LIST OF TABLES
- WHAT'S NEW IN THIS GUIDEBOOK?
- › CHAPTER 1: Introduction
- › CHAPTER 2: Energy Resource Eligibility Requirements
- › CHAPTER 3: Facility Requirements
- › CHAPTER 4: RPS Online System
- › CHAPTER 5: RPS Certification
- › CHAPTER 6: Annual Facility Reports
- › CHAPTER 7: Annual Load-Serving Entity Annual Reports



For more information, see [Chapter 1.1. RPS Legislation](#).



# Rationale

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Easier navigation of the document

Better consistency of numbering formats

Up-to-date language



# Public Comment / Questions

## Instruction

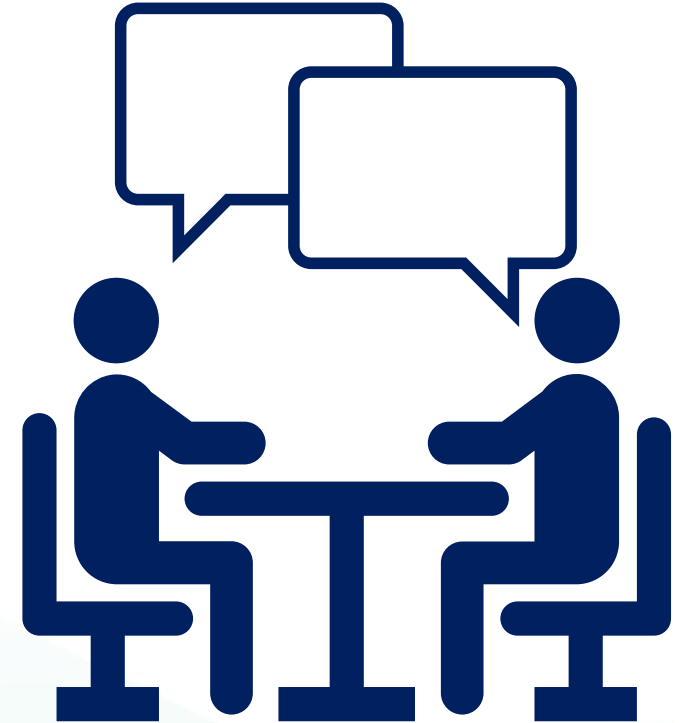
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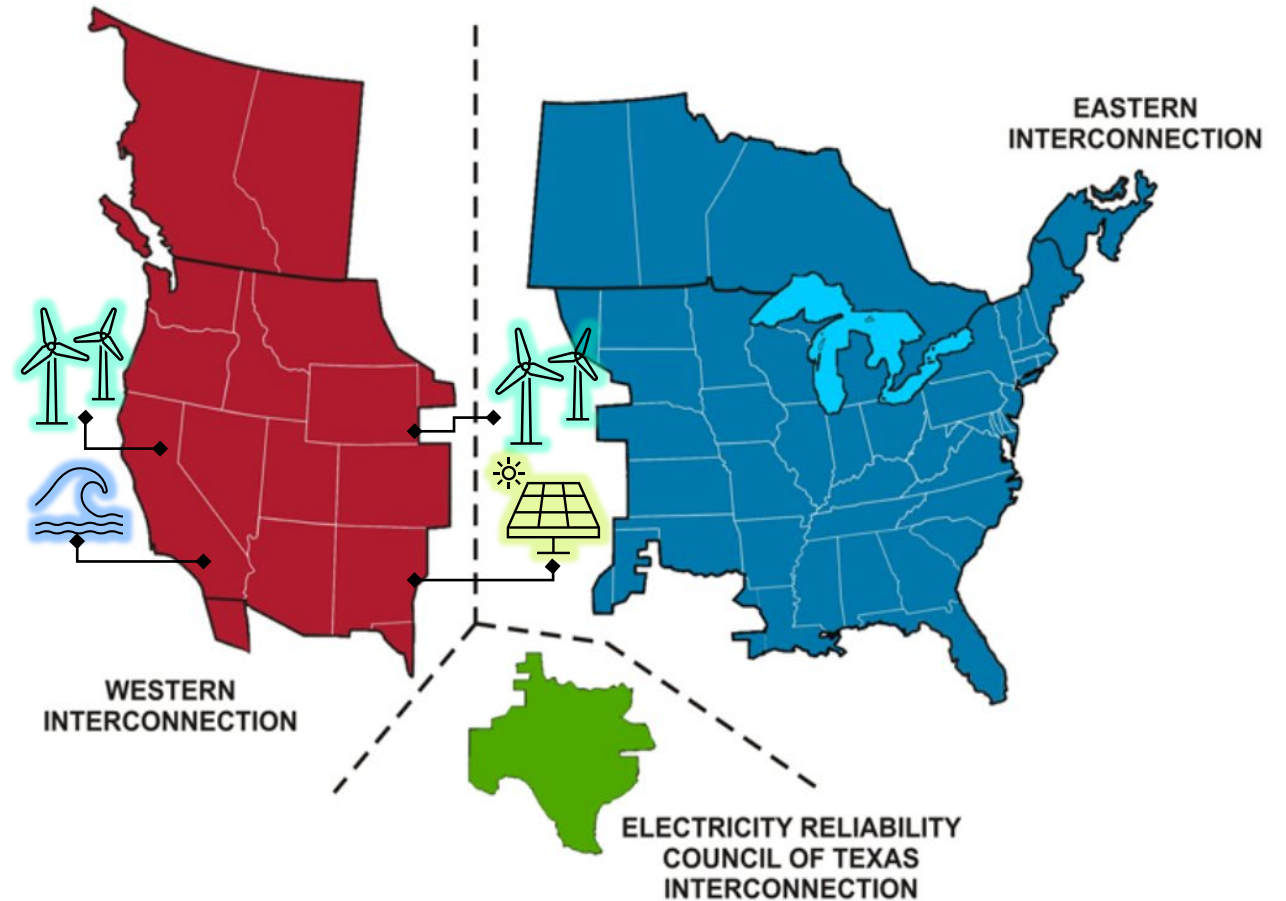


## **Item 2: Location Eligibility**



# Background

- Must have first Point of Interconnection within Western Interconnection
- No reference to physical location in WECC
- No reference to offshore facilities
- **Physical location outside Western Interconnection allowed, but...**



Source: Department of Energy



# Draft Language

Facilities may be physically outside the Western Interconnection, which includes:

- Within “California state waters”
- Within United States’ “Exclusive Economic Zone”
- Beyond United States’ “Exclusive Economic Zone”

Facilities subject to existing LORS requirements:

- Interconnection to non-California balancing authority
- Located beyond United States’ “Exclusive Economic Zone”



# Rationale

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9<sup>th</sup> Edition Guidebook doesn't specify physical location vs interconnection

Provide guidance for offshore facilities



# Public Comment / Questions

## Instruction

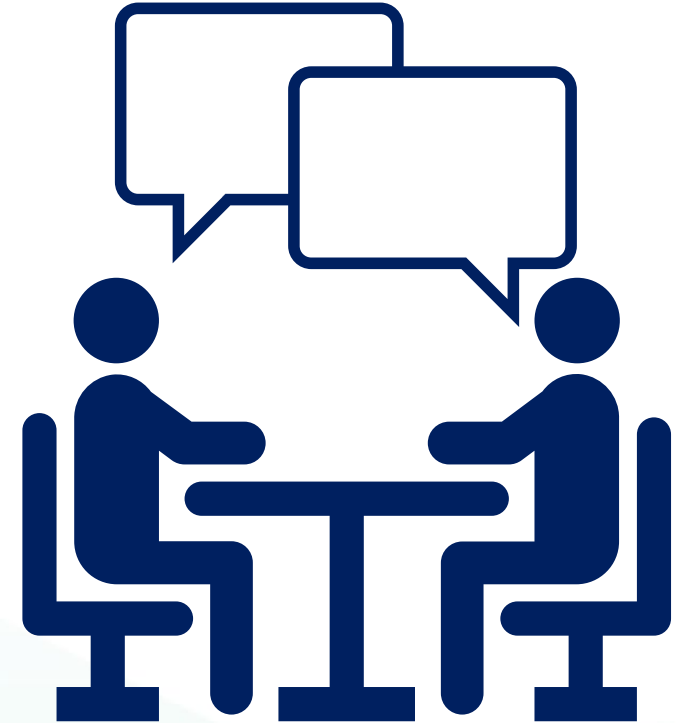
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# **Item 3: Verification & Compliance Updates**



# Verification & Compliance Updates

1 - WREGIS retirement account naming convention (POUs only)

2 - WREGIS adjustments

3 - REC retirements

4 - Reporting for pseudo-tie facilities (POUs only)





# Background

## 1 – WREGIS Retirement Account Naming Convention

- Load-serving entities (LSE) use Western Renewable Energy Generation Information System (WREGIS) to:
  - Track renewable energy credits (RECs)
  - Retire and report RECs annually to the Energy Commission
- LSEs retire RECs in WREGIS subaccounts with specified naming formats.



# Rationale

## 1 – WREGIS Retirement Account Naming Convention

- RPS POU regulations updated to include the long-term procurement contracting requirement; pursuant to Section 3207(c)(2)(D)-(E) of the RPS POU regulations.
- Formalizes annual reporting guidance and is consistent with the RPS POU regulations.



# Draft Language

## 1 – WREGIS Retirement Account Naming Convention

### LTR Codes for POUs

Long-Term Procurement Classification	Code
Long-term	LT
Short-term	ST



# Background & Rationale

## 2 – WREGIS Adjustments

### **Background:**

- Address differences or corrections
- Typos or failed meters may cause issues

### **Rationale:**

- Clarify timeframe and documentation required



# Draft Language

## 2 – WREGIS Adjustments

- Completed before Verification Report adopted at Business Meeting
- Clearly marked showing when adjustment happened
- Explain reason for WREGIS Adjustment
- Assessed on a case-by-case basis



## 3 – REC Retirements

Background - Additional clarification on REC retirements beyond what is specified in the *RPS POU Regulations* causes confusion.

Draft Language - “Furthermore, RECs cannot be counted for a reporting year earlier than the vintage year of the RECs.”

Rationale – No need to restrict or clarify the language that is in the *RPS POU Regulations*.



# Background

## 4 – Reporting for Pseudo-tie Facilities (POUs only)

- PUC code 399.16(b)(1)(B)
- Dynamic Transfers:
  - Dynamic Schedule
  - Pseudo Tie
- Non-CBA dynamic transfers: POUs submit e-Tag reports





# Draft Language

## 4 – Reporting for Pseudo-tie Facilities (POUs only)

Category	Dynamic Transfer Schedule Method	Required Docs	Annual WREGIS Reports	E-Tag Reports	Hourly Reports
PCC 1	Pseudo-tie	- PPA - Pseudo-tie agreement	Yes	<del>Yes</del> No	No
	Dynamic schedule	PPA	Yes	Yes	No



# Rationale

## 4 – Reporting for Pseudo-tie Facilities (POUs only)

### Dynamic Transfers

- Dynamic schedule
  - The resource is still under control by its host Balancing Authority Area
- Pseudo-tie
  - Attaining Balancing Authority fully controls a pseudo-tie resource



# Public Comment / Questions

## Instruction

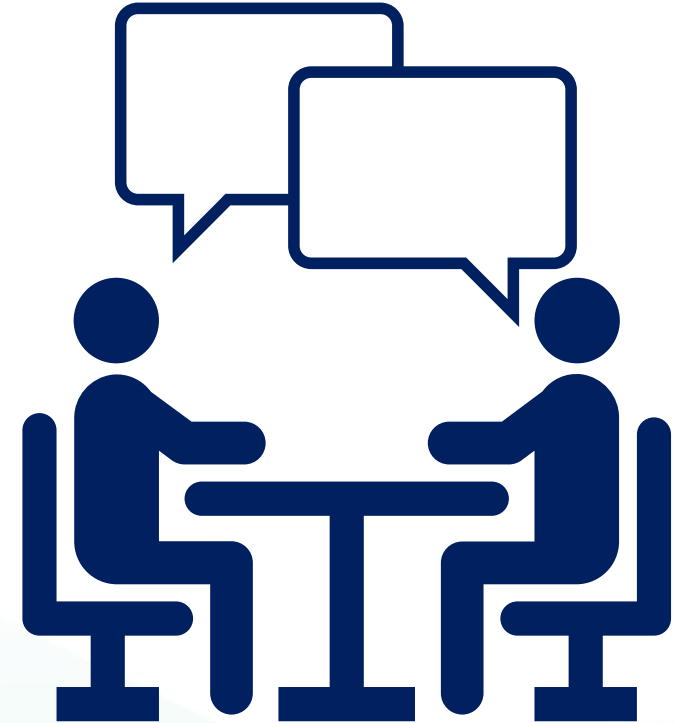
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# Item 4: Energy Storage



# Background

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Exponential increase in storage systems since last Guidebook update (2017)

Storage can be “addition or enhancement”

Additions or enhancements subject to REC accounting requirements

Confusion over accounting requirements regarding storage losses



# Draft Language

Storage designated and metered separately not subject to loss accounting

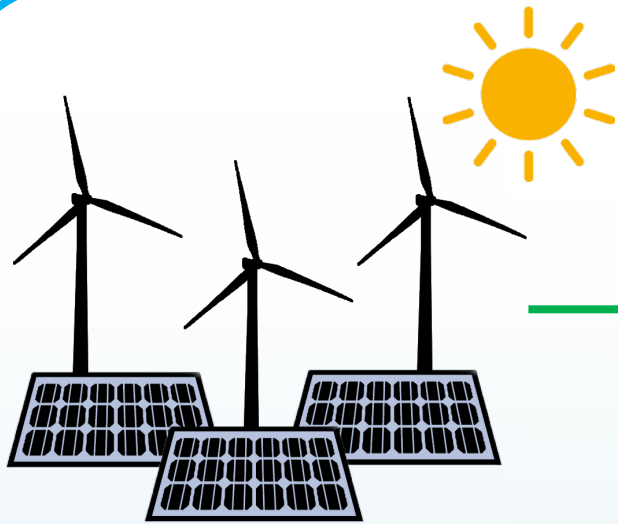
Only additions or enhancements subject to loss accounting

Losses for interconnection still netted (i.e. transformer, line loss, etc.)

Any eligible resources used as electricity inputs must be netted out (e.g. pumped hydro storage)



# Project Example



Renewables

**RPS Project**

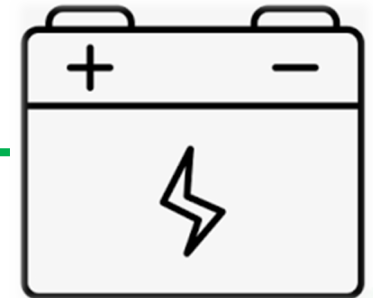


M2

M1



M3



Energy  
Storage





# Rationale

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Clarify loss accounting requirements

Avoid incentivizing/disincentivizing configurations

Remove diagrams/categories to allow flexibility



# Public Comment / Questions

## Instruction

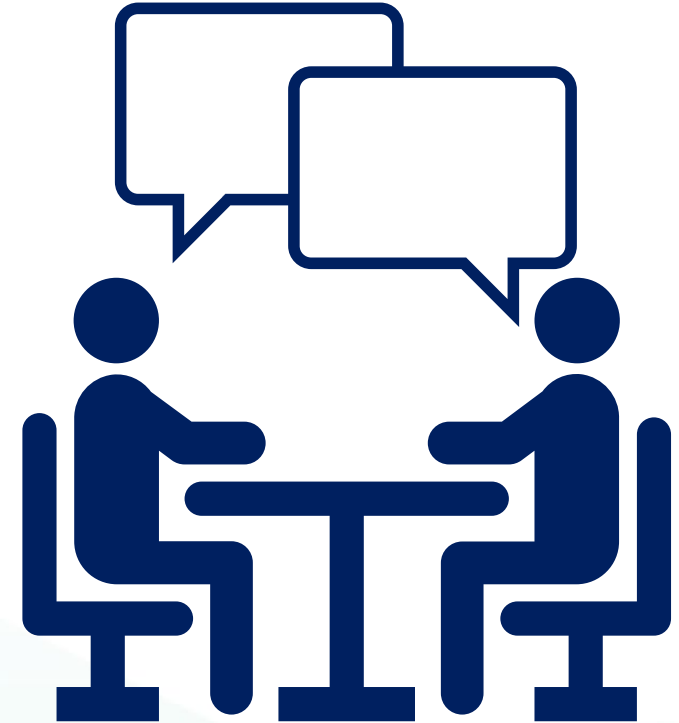
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# **Item 5: Metering Requirements**



# Background

AC & DC meters were not explicitly stated in the 9<sup>th</sup> Ed. Guidebook

- AC meters are standard
- DC meters are not standard

Accuracy requirement was first introduced in the 5<sup>th</sup> Edition Guidebook

- The 5<sup>th</sup> Edition Guidebook was adopted in May 2012

Draft language updates and clarifies requirements



# Draft Language

Statement: alternating current and direct current allowed

Meter accuracy rating updated to  $\pm 0.5\%$

Accuracy verification process moved from footnote to main body

Added language requiring generation reported need to be:

- Measured at first POI to transmission or distribution grid
- Or, adjusted to reflect energy delivered to transmission or distribution grid at high side of transformer

Effective upon adoption of the 10<sup>th</sup> Ed. Guidebook adoption



# Rationale

DC meter technology able to perform required measurement

- Convert to AC values and meet same requirements as AC meters

Allow flexibility in facility design

- DC systems have more ability to isolate renewable generation

Accuracy update to align with improving technology and standards

- WREGIS already has a  $\pm 0.5\%$  accuracy requirement

New rules don't apply to existing meters

- Will not require updates to meters if installed before adoption



# Public Comment / Questions

## Instruction

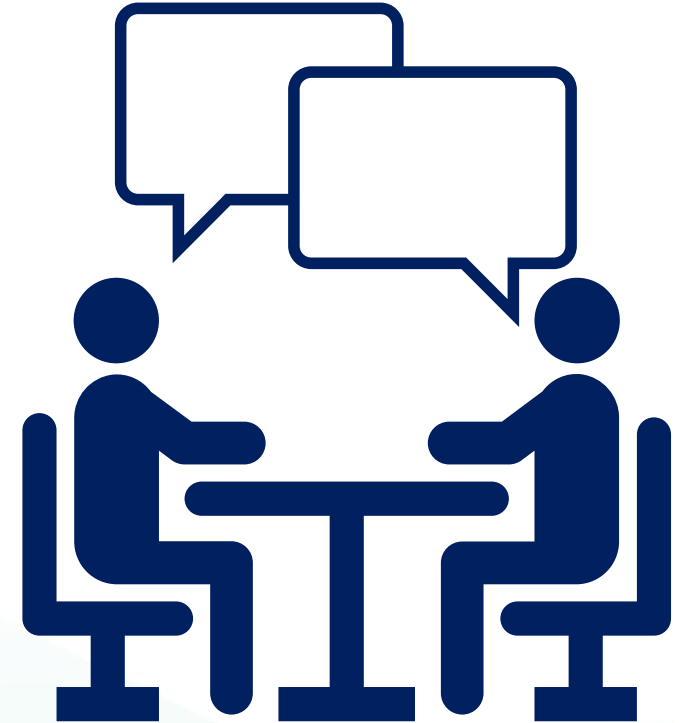
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# **Item 6: Distributed Generation**





# Background

- Collection of individual distributed energy resources (DERs)
  - Rooftop solar
  - Battery storage
  - Demand flexible appliances
- Only generating DERs are eligible for RPS
- Eligible following CPUC Decisions D.05-05-011 and D.11-12-052
- **Recent interest in participation from developers**



*Source: Energy Commission*



# Draft Language

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Term "Aggregated Unit" changed to "Distributed Generation Group"

Clarified participation in programs such as NEM allowed

Instructions for bulk quantity of DG applications

New requirement: All facilities in a group must share a balancing authority



# Rationale

## Increase in participation by stakeholders

- Need to standardize and streamline DG apps
- Need to clarify existing requirements

## No significant change to requirements

- DG has been eligible for RPS since 5<sup>th</sup> Edition Guidebook (2012)
- Flexible to process improvements



# Public Comment / Questions

## Instruction

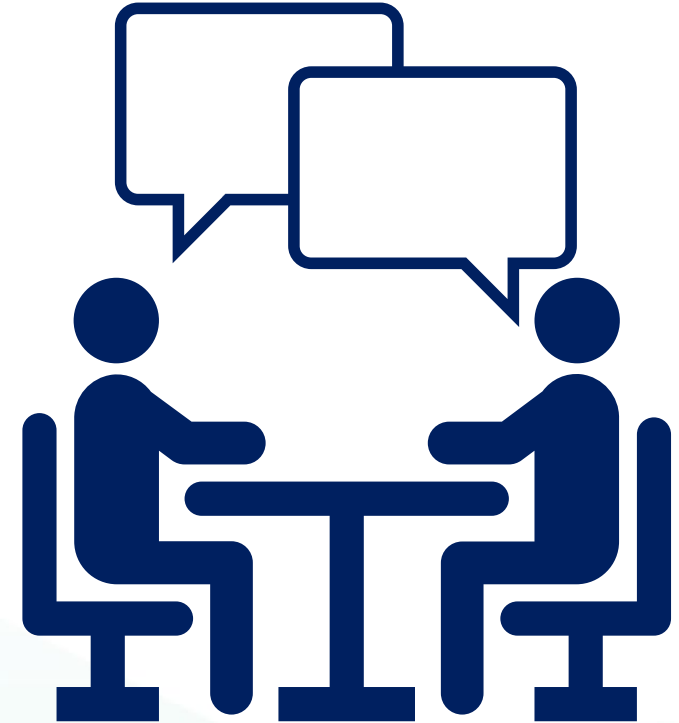
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# **Item 7: Facilities with Air Permits**



# Background

## Senate Bill (SB) 100

- 100% RPS-eligible and zero-carbon resources by 2045
  - Supply CA's electric retail sales

## Renewables Portfolio Standard

- Allows emissions under very specific circumstances
- Evolving technologies call for consideration of impact to air quality



*Source: Energy Commission*





# Draft Language

## Facilities subject to Clean Air Act Title V permitting to provide emissions documentation

- Existing docs to outline how facilities intend to operate within assigned emissions limits
  - New facilities submit emissions docs at the time of application
  - Existing facilities provide emissions docs upon request



# Draft Language

Noncompliance with environmental regulations may cause certification suspensions

“The Energy Commission, through its Executive Director, may revoke the RPS certification of any awardee if it is determined that the RPS-certified facility no longer satisfies the requisite eligibility requirements under the guidebook in place when certification was approved, or violates existing laws related to the RPS program goals, including failure to comply with licensing, permitting, and reporting regulations set by state, federal, and local agencies.”





# Rationale

Ensure facilities continue to provide intended benefits to the state (PUC 399.11) as technologies evolve

- Reducing air pollution in the state
- Meeting state's climate goals by GHG reduction

Certification may be revoked for facilities not complying with laws in a way that undermines RPS statutory goals

- Facilities whose eligibility is in question will be contacted by CEC
- Facilities may have 1 year to resolve suspension, prior to disapproval



# Public Comment / Questions

## Instruction

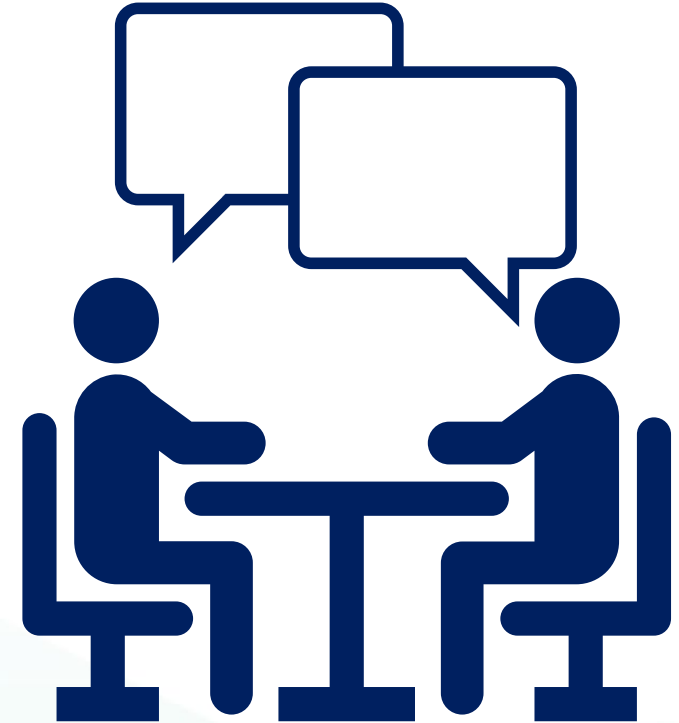
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# **Item 8: Biomethane Delivery**



# Background

## Public Utilities Code Section 399.12.6

- (3) The biomethane is delivered to a generating facility through a common carrier pipeline and meets all of the following requirements:
- (A) The source of biomethane injects the biomethane into a common carrier pipeline that physically flows within California or toward the generating facility for which the biomethane was procured under the original contract.

## RPS Eligibility Guidebook

- 3) The final delivery point of the biomethane must be the generation facility with the following exceptions:
- a) New Biomethane Procurement Contracts: The delivery requirements are satisfied if the facility is within California and receives biomethane from a biomethane production site that injects the biomethane into a common carrier pipeline that physically flows within California.



# Draft Language

## 2.3.3.2 Biomethane Delivery Requirements

...

c) The final delivery point of the biomethane must be the generation facility with the following exceptions:

1) New biomethane procurement contracts: The delivery requirements are satisfied if the facility is within California and ~~receives~~ procures biomethane from a biomethane production site that injects the biomethane into a common carrier pipeline that physically flows within California. In such cases, the final delivery point shall be the point of injection in California into a common carrier pipeline that physically flows within California.



# Rationale

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Clarify requirements and better align with statute

Reduce stakeholder confusion for fully in-state projects



# Public Comment / Questions

## Instruction

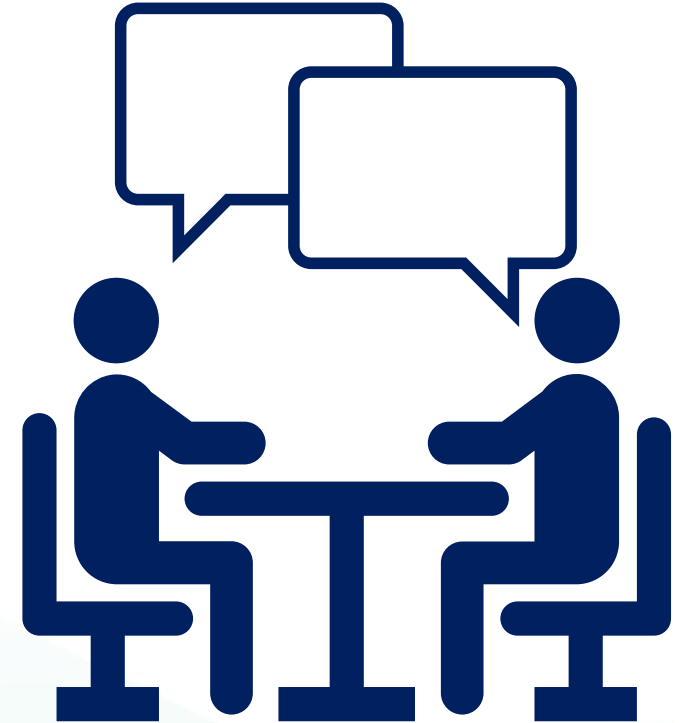
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# **Item 9: Linear Generators and Fuel Cells**





# Background

Linear generators are not listed as an eligible renewable energy resource

Fuel cells are RPS-eligible if utilizing an RPS-eligible fuel

- Non-fossil-based fuel and feedstock or qualifying hydrogen

AB 1921 (Papan, 2024)

- Added linear generators as eligible renewable energy resource



# Draft Language

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Linear generators added as an RPS-eligible resource

Same fuel eligibility requirements as fuel cells

RPS Online registration restrictions due to fuel flexibility

Fuel cell eligibility unchanged from 9<sup>th</sup> Ed. Guidebook



# Draft Language

## **2.4 Fuel Cell or Linear Generator Using ~~Renewable Fuel~~ an RPS-Eligible Renewable Energy Resource**

A facility that uses a fuel cell conversion or linear generator technology may qualify for RPS certification if the facility uses either an RPS-eligible renewable energy resource, qualifying hydrogen gas, or both, as described below.

### **2.4.1 Fuel Cells or Linear Generators Using an RPS-Eligible Renewable Energy Resource**

A facility converting gas to electricity in a fuel cell or linear generator may qualify for RPS certification if the gas is an RPS-eligible renewable energy resource as described in this guidebook.

### **2.4.2 Fuel Cells or Linear Generators Using Qualifying Hydrogen Gas**

A facility converting hydrogen gas to electricity in a fuel cell or linear generator may qualify for RPS certification if the hydrogen was derived from a non-fossil-based fuel or feedstock through a process powered using an RPS-eligible renewable energy resource. The electricity generated by a facility using this type of hydrogen gas is eligible for the RPS only if the electricity that was used to derive the hydrogen is not also counted toward an RPS compliance obligation or claimed for any other program as renewable generation. The applicant must submit information on the hydrogen production process as part of the application.



# Rationale

## Modifications to Public Resources Code 25741(a)(1)

- Per Assembly Bill 1921 (Papan, 2024)

### 25741.

As used in this chapter, the following definitions apply:

(a) “Renewable electrical generation facility” means a facility that meets all of the following criteria:

(1) The facility uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells or linear generators using fuels described in this paragraph that otherwise meet the requirements of this subdivision, small hydroelectric generation of 30 megawatts or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and any additions or enhancements to the facility using that technology.



# Public Comment / Questions

## Instruction

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# Other Revision Topics



# Other Topics



# Next Steps





# Schedule

Milestone	Anticipated Date
Written Comments Due	October 20, 2025
Post Final 10 <sup>th</sup> Ed. RPS Guidebook	November 2025
Business Meeting	December 2025



# Public Comment / Questions

## Instruction

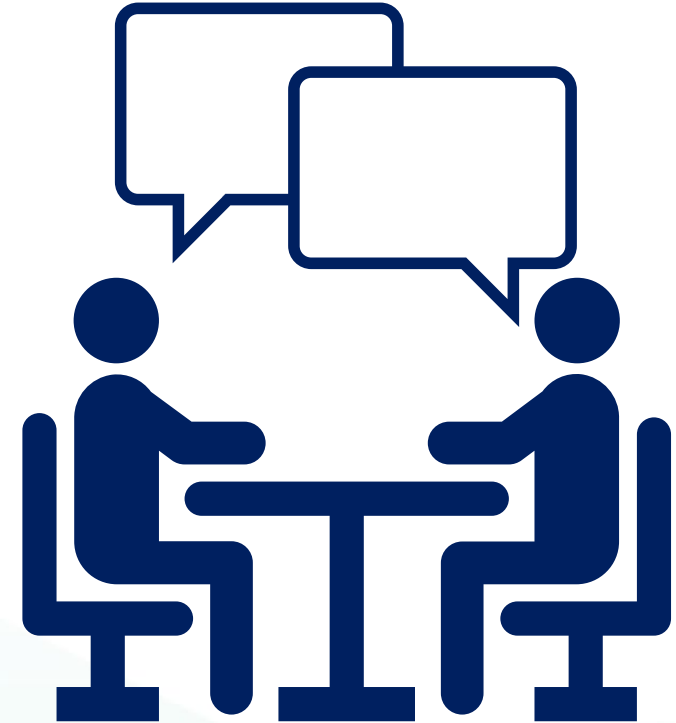
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# Thank You!

Web: [Renewables Portfolio Standard – RPS](#)  
Docket Log: [21-RPS-02](#)

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