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**CALIFORNIA
ENERGY COMMISSION**



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NATURAL
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STAFF DRAFT REPORT

Renewables Portfolio Standard Verification Results

Industry Public Utilities

Compliance Period 4 (2021–2024)

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California Energy Commission

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DISCLAIMER

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ABSTRACT

This *Renewables Portfolio Standard Verification Results Report* covers the verification results for the Industry Public Utilities for Compliance Period 4, which covers 2021 through 2024.

Keywords: Renewables Portfolio Standard, RPS, Renewable Energy Credits, RECs, renewable attributes, retail sellers, annual procurement target, certification, verification, compliance, generation, load-serving entities, Long-term Procurement Requirement, local publicly owned electric utilities, POU, Portfolio Content Categories, historic carryover, optional compliance measures, Western Renewable Energy Generation Information System, WREGIS

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RPS Verification Results: Compliance Period 4 Industry Public Utilities

Background

The California Energy Commission (Energy Commission) 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. Enacted by Senate Bill 1078 (Sher, Chapter 516, Statutes of 2002) and accelerated and expanded by subsequent legislation, California's RPS establishes increasing renewable energy procurement targets spanning multiyear compliance periods for the state's electric load-serving entities (LSEs). Originally applicable to retail sellers, the statewide mandatory RPS was expanded by Senate Bill X1-2 (Simitian, Chapter 1, Statutes of 2011, First Extraordinary Session) to include local publicly owned electric utilities (POUs). As a result of Senate Bill 100 (De León, Chapter 312, Statutes of 2018), LSEs are required to increase their procurement of eligible renewable energy resources to 60 percent of retail sales by 2030.

As part of its responsibilities, the Energy Commission verifies the eligibility of renewable energy procured by LSEs, which include retail sellers and POUs that are obligated to participate in California's RPS. The Energy Commission is also responsible for certifying RPS-eligible renewable energy resources and overseeing compliance and enforcement of POUs. The California Public Utilities Commission (CPUC) is responsible for compliance and enforcement for retail sellers.

Report Overview

This report covers the RPS verification results for POU procurement claims for Compliance Period 4, which covers 2021 through 2024. The verification report provides an overview of the identified POU's results and tables, including:¹

- The POU's procurement target and portfolio balance requirements and limitations.
- The amount of eligible renewable energy credits (RECs) retired, and the amount applied to meet the compliance period requirements, both shown by Portfolio Content Category classification and Long-Term Procurement Requirement classification, as applicable.
- Any deficits in meeting RPS procurement requirements for the compliance period.
- Any optional compliance measures being applied by the POU for the compliance period.
- A calculation of excess procurement accumulated in this compliance period.

¹ The contents of verification results reports will vary for POUs with specific exclusions, exceptions, or different procurement requirements under the RPS statutes and as described in the [Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities](#) based on the requirements specific to that POU.

- A summary of the POU's excess procurement and historic carryover, if any, including any prior balance, the amount accumulated and used in the current compliance period, and remaining balance.

In adopting this report, the Energy Commission finds the procurement claim amounts listed are consistent with RPS certification and procurement requirements specified in the [Renewables Portfolio Standard Eligibility Guidebook, Ninth Edition \(Revised\)](#) and the [Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities](#) and are eligible for the RPS as indicated. Therefore, the procurement claim amounts count toward meeting the identified POU's RPS procurement requirements.

Verification Process

The methods used by the Energy Commission to verify load-serving entity procurement claims are detailed in the [Renewables Portfolio Standard Eligibility Guidebook, Ninth Edition \(Revised\)](#) and further explained in the *Renewables Portfolio Standard Verification Methodology Report, Fourth Edition*.²

The verification results presented in this report are not a compliance determination. After the POU's verification results are adopted by the Energy Commission, staff will use the verification results to determine if the POU complied with the RPS requirements for Compliance Period 4 in accordance with the [Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities](#).³ The Energy Commission executive director will make a compliance determination informed by the verification results presented in each POU's verification results report and, if applicable, the application of optional compliance measures by the POU. The executive director will issue a letter to each POU documenting the RPS compliance determination.

Verification Results

For RPS Compliance Period 4 (2021–2024), the Industry Public Utilities retired and reported 37,274 RECs, and 36,842 RECs were verified by the Energy Commission as RPS-eligible.⁴ Each [POU's summary claims report](#), which includes claim eligibility details, is available at <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard/renewables>.

For Compliance Period 4, the Industry Public Utilities had a procurement target of 59,523 RECs, which represents the sum of all the annual soft targets of its retail sales over 2021–2024. The Industry Public Utilities applied 36,842 RECs from Compliance Period 4 RPS-eligible

2 Refer to Chapter 7 of the [Renewables Portfolio Standard Eligibility Guidebook, Ninth Edition \(Revised\)](#) and the *Renewables Portfolio Standard Verification Methodology Report, Fourth Edition*.

3 The [Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities](#), with the most recent update having taken effect July 12, 2021, are set forth in 20 CCR §§ 1240 and 3200–3208 and establish the rules and procedures by which the Energy Commission will assess a POU's procurement actions and determine whether those actions meet the RPS requirements.

4 The number of RECs verified by the Energy Commission is fewer than the number of RECs retired and reported because claims were determined ineligible due to RECs being retired more than 36 months after the vintage. Please refer to the POU's summary claims report for more detail.

RECs toward its procurement requirements, equal to 24.62 percent of its retail sales for the compliance period, and had a procurement target deficit of 22,681 RECs.

The Industry Public Utilities applied the cost limitation and delay of timely compliance optional compliance measures to meet its procurement requirements. Energy Commission staff will evaluate optional compliance measures following adoption of the Industry Public Utilities' Compliance Period 4 (2021–2024) verification results.



Compliance Period (CP) 4 RPS Requirement Calculations

Procurement Target Calculation (MWh)			
Calendar Year	Annual Retail Sales	Soft Target Percentage ¹	Soft Targets
2021	38,822	35.75	13,878
2022	39,704	38.50	15,286
2023	33,820	41.25	13,950
2024	37,295	44.00	16,409
Procurement Target			59,523

Portfolio Balance Requirement Calculation (PBR) (MWh) ²						
RECs Applied	Category 0 Applied	Total Pre June 1, 2010, Applied	Historic Carryover Applied	Category	PBR Percentage	Balance Requirements
36,842	0	0	0	Category 1 minimum	75	27,631
				Category 3 limit	10	3,684

Long-Term Procurement Requirement Calculation (MWh) ³	
65% (RECs Applied)	
65% (36,842)	
Long-Term Procurement Requirement	23,947

Compliance Period 4 Verification Results

Procurement Target (MWh)	
Target	59,523
Applied	36,842
Deficit	22,681
Renewable Percentage	24.62%
RPS Portfolio Balance Requirements (MWh)	
Category 1 Balance Requirement	27,631
Category 1 Applied	36,842
Category 1 Requirement Deficit	0
Category 3 Balance Limitation	3,684
Category 3 Applied	0
Category 3 Disallowed	0

Long-Term Procurement Requirement	
Long-Term Procurement Requirement	23,947
Long-Term Applied	26,798
Long-Term Procurement Requirement Deficit	0
Optional Compliance Measures Applied	
Cost Limitation	Yes
Delay of Timely Compliance	Yes
Portfolio Balance Reduction	No

RECs Available and Applied in Compliance Period 4

RECs Available (MWh)						
Portfolio Content Category (PCC)	Surplus RECs	Prior Balances Available		Eligible RECs Retired in CP4		Total RECs Available
		Long-Term	Short-Term	Long-Term	Short-Term	
Category 0 (PCC 0)	0	0		0		0
Pre June 2010 PCC 1	0	0		0	0	0
Pre June 2010 PCC 2	0	0		0	0	0
Pre June 2010 PCC 3	0			0	0	0
Category 1 (PCC 1)	0	0		26,798	10,044	36,842
Category 2 (PCC 2)	0	0		0	0	0
Category 3 (PCC 3)	0			0	0	0
Historic Carryover		0				0
Subtotal	0	0		26,798	10,044	
Total RECs Available						36,842

CP 4 RECs Applied (MWh)						
Portfolio Content Category (PCC)	Surplus RECs	Prior Balances Applied		Eligible RECs Retired in CP4		Total RECs Applied
		Long-Term	Short-Term	Long-Term	Short-Term	
Category 0 (PCC 0)	0	0		0		0
Pre June 2010 PCC 1	0	0		0	0	0
Pre June 2010 PCC 2	0	0		0	0	0
Pre June 2010 PCC 3	0			0	0	0
Category 1 (PCC 1)	0	0		26,798	10,044	36,842
Category 2 (PCC 2)	0	0		0	0	0
Category 3 (PCC 3)	0			0	0	0
Historic Carryover		0				0
Subtotal	0	0		26,798	10,044	
Total RECS Applied						36,842

Excess Procurement

CP 4 Excess Procurement Calculation (MWh) ⁴						
Portfolio Content Category (PCC)	CP 4 Eligible RECs Retired		CP 4 RECs Applied		CP 4 Accumulated	
	Long-Term	Short-Term	Long-Term	Short-Term	Long-Term	Short-Term
Category 0 (PCC 0)	0		0		0	
Pre June 2010 PCC 1	0	0	0	0	0	0
Category 1 (PCC 1)	26,798	10,044	26,798	10,044	0	0
Subtotal	0	0	0	0		
Total RECS Accumulated					0	

Balance of Excess Procurement and Historic Carryover (MWh)								
Portfolio Content Category (PCC)	Beginning Balance		Applied in CP4		Accumulated in CP4		Ending Balance	
	Long-Term	Short-Term	Long-Term	Short-Term	Long-Term	Short-Term	Long-Term	Short-Term
Category 0 (PCC 0)	0		0		0		0	
Pre June 2010 PCC 1	0		0		0	0	0	0
Pre June 2010 PCC 2	0		0				0	
Category 1 (PCC 1)	0		0		0	0	0	0
Category 2 (PCC 2)	0		0				0	
Historic Carryover	0		0				0	
Subtotal	0		0		0	0		
Total Ending Balance							0	

1 "Soft Target" is defined in Section 3204(a)(4) of the [RPS POU Regulations](#).

2 Calculated as specified in Section 3204(c)(3) of the [RPS POU Regulations](#).

3 Calculated as specified in Section 3204(d)(1) of the [RPS POU Regulations](#).

4 Calculated as described in the [RPS Verification Methodology Report, Fourth Edition](#) and in Section 3206(a)(1) of the [RPS POU Regulations](#).

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