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**CALIFORNIA
ENERGY COMMISSION**



**CALIFORNIA
NATURAL
RESOURCES
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California Energy Commission

STAFF DRAFT REPORT

Renewables Portfolio Standard Verification Results

Lodi Electric Utility

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 Lodi Electric Utility 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

Lodi Electric Utility

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 (POU). 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), Lodi Electric Utility retired and reported 551,482 RECs, and 547,227 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, Lodi Electric Utility had a procurement target of 680,658 RECs, which represents the sum of all the annual soft targets of its retail sales over 2021–2024. Lodi Electric Utility applied 680,658 RECs from Compliance Period 4 RPS-eligible RECs, excess

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.

procurement, and historic carryover toward its procurement requirements, equaling the number of RECs needed to meet its procurement target.



Compliance Period (CP) 4 RPS Requirement Calculations

Procurement Target Calculation (MWh)			
Calendar Year	Annual Retail Sales	Soft Target Percentage ¹	Soft Targets
2021	422,653	35.75	151,098
2022	433,154	38.50	166,764
2023	414,189	41.25	170,852
2024	436,237	44.00	191,944
Procurement Target			680,658

Portfolio Balance Requirement Calculation (PBR) (MWh) ²						
Procurement Target	Category 0 Applied	Total Pre June 1, 2010, Applied	Historic Carryover Applied	Category	PBR Percentage	Balance Requirements
680,658	339,941	0	94,502	Category 1 minimum	75	184,661
				Category 3 limit	10	24,621

Long-Term Procurement Requirement Calculation (MWh) ³	
65% (Procurement Target)	
65% (680,658)	
Long-Term Procurement Requirement	442,427

Compliance Period 4 Verification Results

Procurement Target (MWh)	
Target	680,658
Applied	680,658
Deficit	0
Renewable Percentage	39.89%
RPS Portfolio Balance Requirements (MWh)	
Category 1 Balance Requirement	184,661
Category 1 Applied	221,595
Category 1 Requirement Deficit	0
Category 3 Balance Limitation	24,621
Category 3 Applied	24,620
Category 3 Disallowed	0

Long-Term Procurement Requirement	
Long-Term Procurement Requirement	442,427
Long-Term Applied	626,109
Long-Term Procurement Requirement Deficit	0
Optional Compliance Measures Applied	
Cost Limitation	No
Delay of Timely Compliance	No
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	38,929		301,012		339,941
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		191,666	29,929	221,595
Category 2 (PCC 2)	0	0		0	0	0
Category 3 (PCC 3)	0			0	24,620	24,620
Historic Carryover		98,086				98,086
Subtotal	0	137,015		492,678	54,549	
Total RECs Available						684,242

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	38,929		301,012		339,941
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		191,666	29,929	221,595
Category 2 (PCC 2)	0	0		0	0	0
Category 3 (PCC 3)	0			0	24,620	24,620
Historic Carryover		94,502				94,502
Subtotal	0	133,431		492,678	54,549	
Total RECS Applied						680,658

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)	301,012		301,012		0	
Pre June 2010 PCC 1	0	0	0	0	0	0
Category 1 (PCC 1)	191,666	29,929	191,666	29,929	0	0
Subtotal	492,678	29,929	492,678	29,929		
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)	38,929		38,929		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	98,086		94,502				3,584	
Subtotal	137,015		133,431		0	0		
Total Ending Balance							3,584	

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](#).

References

- California Energy Commission staff. 2021. [Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities](https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/rps-enforcement-regulations-publicly). Available at <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/rps-enforcement-regulations-publicly>
- Chou, Kevin, Christopher Metzker. 2026. [Renewables Portfolio Standard Verification and Compliance Methodology Report, Fourth Edition](https://www.energy.ca.gov/publications/2026/renewables-portfolio-standard-verification-and-compliance-methodology-report). California Energy Commission, Publication Number: CEC-700-2026-003. Available at <https://www.energy.ca.gov/publications/2026/renewables-portfolio-standard-verification-and-compliance-methodology-report>
- Green, Lynette, Christina Crume. 2017. [Renewables Portfolio Standard Eligibility Guidebook, Ninth Edition](https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/previous-renewables-portfolio-standard). California Energy Commission, Publication Number: CEC-300-2016-006-ED9-CMF-REV. Available at <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/previous-renewables-portfolio-standard>