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**CALIFORNIA
ENERGY COMMISSION**



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NATURAL
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California Energy Commission
STAFF DRAFT REPORT

Renewables Portfolio Standard Verification Results

**Power and Water Resources Pooling Authority
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 Power and Water Resources Pooling Authority 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

Power and Water Resources Pooling Authority

Background

The California Energy Commission (CEC) 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 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), Power and Water Resources Pooling Authority retired and reported 488,654 RECs, and 488,322 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>.

POUs meeting requirements in 20 California Code of Regulations (CCR) Section 3204(b)(8) of the [*Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities*](#) qualify for a retail sales exemption. Between January 1, 2019, and December 31, 2030, a POU that receives more than 40 percent of its annual retail sales from large

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.

hydroelectric generation during a given year of the compliance period is not required to procure certain electricity products. The soft target shall equal the lesser of the portion of the POU's retail sales unsatisfied by the POU's large hydroelectric generation or the soft target for the relevant year of the compliance period.

Power and Water Resources Pooling Authority qualified for the procurement requirement exemption under Section 3204(b)(8) in 2023 and 2024. Power and Water Resources Pooling Authority reported 156,088 MWh of large hydroelectric generation for 2023 and 203,310 MWh of large hydroelectric generation for 2024. Energy Commission staff verified 156,088 MWh and 203,310 MWh, for 2023 and 2024 respectively, as meeting the criteria of large hydroelectric generation under Section 3204(b)(8)(A).

The large hydroelectric generation did not reduce Power and Water Resources Pooling Authority's 2023 soft target because the soft target was the lesser amount compared to the portion of Power and Water Resources Pooling Authority's 2023 retail sales unsatisfied by the large hydroelectric generation. The large hydroelectric generation had the effect of reducing Power and Water Resources Pooling Authority's 2024 soft target from 128,618 RECs to 89,004 RECs, or by 30.8 percent. The 2024 large hydroelectric generation had the effect of reducing Power and Water Resources Pooling Authority's total Compliance Period 4 target from 540,042 to 500,428 RECs, reducing the REC procurement requirement by 7.34 percent.

For Compliance Period 4, Power and Water Resources Pooling Authority had a procurement target of 500,428 RECs, which represents the sum of all the annual soft targets of its retail sales over 2021–2024. Power and Water Resources Pooling Authority applied 500,428 RECs from CP 4 RPS-eligible RECs and excess procurement toward its procurement requirements, equaling the number of RECs needed to meet their procurement target.



Compliance Period (CP) 4 RPS Requirement Calculations

Procurement Target Calculation (MWh)				
Calendar Year	Annual Retail Sales	Qualifying Hydroelectric Generation	Soft Target Percentage ¹	Soft Targets
2021	395,623	125,872	35.75	141,435
2022	389,352	56,380	38.50	149,900
2023	291,125	156,088	41.25	120,089
2024	292,314	203,310	44.00	89,004
Procurement Target				500,428

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
500,428	18,167	0	0	Category 1 minimum	75	361,695
				Category 3 limit	10	48,226

Long-Term Procurement Requirement Calculation (MWh) ³	
65% (Procurement Target)	
65% (500,428)	
Long-Term Procurement Requirement	325,278

Compliance Period 4 Verification Results

Procurement Target (MWh)	
Target	500,428
Applied	500,428
Deficit	0
Renewable Percentage	36.57%
RPS Portfolio Balance Requirements (MWh)	
Category 1 Balance Requirement	361,695
Category 1 Applied	424,035
Category 1 Requirement Deficit	0
Category 3 Balance Limitation	48,226
Category 3 Applied	50,183
Category 3 Disallowed	1,957

Long-Term Procurement Requirement	
Long-Term Procurement Requirement	325,278
Long-Term Applied	448,303
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	0		18,167		18,167
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	80,323		409,972	0	490,295
Category 2 (PCC 2)	0	0		0	10,000	10,000
Category 3 (PCC 3)	0			6,101	44,082	50,183
Historic Carryover		0				0
Subtotal	0	80,323	0	434,240	54,082	
Total RECs Available						568,645

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		18,167		18,167
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	80,323		343,712	0	424,035
Category 2 (PCC 2)	0	0		0	10,000	10,000
Category 3 (PCC 3)	0			6,101	44,082	50,183
Historic Carryover		0				0
Subtotal	0	80,323		367,980	54,082	
Total RECS Applied						502,385

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)	18,167		18,167		0	
Pre June 2010 PCC 1	0	0	0	0	0	0
Category 1 (PCC 1)	409,972	0	343,712	0	66,260	0
Subtotal	428,139	0	361,879	0		
Total RECS Accumulated					66,260	

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)	80,323		80,323		66,260	0	66,260	0	
Category 2 (PCC 2)	0		0				0		
Historic Carryover	0						0		
Subtotal	80,323		80,323		66,260	0			
							Total Ending Balance	66,260	

1 "Soft Target" is defined in Section 3204(b)(a) 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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