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<b>Document Title:</b>	Anaheim Public Utilities - Staff Draft RPS Verification Results Report for Compliance Period 4
<b>Description:</b>	<p>THIS DOCUMENT SUPERSEDES TN #269567. This Verification Results Report for Compliance Period 4 is being reposted to address minor, non-substantive errors in the Verification Results Report tables.</p> <p>During document preparation, the draft Verification Results Report tables displayed incorrect information- the subtotal row in the RECs Available table displayed an incorrect number. Please note that the final results were not affected - staff have updated the tables to reflect the accurate data.</p>
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**CALIFORNIA  
ENERGY COMMISSION**



**CALIFORNIA  
NATURAL  
RESOURCES  
AGENCY**

California Energy Commission

## **STAFF DRAFT REPORT**

# **Renewables Portfolio Standard Verification Results**

**Anaheim Public Utilities**

**Compliance Period 4 (2021–2024)**

**April 2026 | CEC-700-2026-005-SD**

# California Energy Commission

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## **DISCLAIMER**

Staff members of the California Energy Commission (Energy Commission) prepared this report. As such, it does not necessarily represent the views of the Energy Commission or the State of California. The information contained in this draft is based on staff analysis and is not approved until the Energy Commission officially adopts the final verification results report. The Energy Commission makes no claims, promises, or guarantees about the accuracy, completeness, or adequacy of its contents and expressly disclaims legal liability for the contents in this report. The purpose of this draft report is for informational purposes only, and it is not intended to be construed as legal advice.

# ABSTRACT

This *Renewables Portfolio Standard Verification Results Report* covers the verification results for the Anaheim 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 Anaheim Public Utilities

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## 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:<sup>1</sup>

- 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.

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<sup>1</sup> 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*.<sup>2</sup>

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](#).<sup>3</sup> 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 Anaheim Public Utilities retired and reported 3,063,628 RECs, and 3,063,628 RECs were verified by the Energy Commission as RPS-eligible. 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 Anaheim Public Utilities had a procurement target of 3,288,652 RECs, which represents the sum of all the annual soft targets of its retail sales over 2021–2024. The Anaheim Public Utilities applied 3,301,549 RECs from Compliance Period 4 RPS-eligible RECs and excess procurement toward its procurement requirements, exceeding the number of RECs needed to meet its procurement target.

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

<sup>3</sup> 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.

For calculating the procurement requirements, the Anaheim Public Utilities received a reduction in total retail sales to account for sales associated with a green pricing program (GPP),<sup>4</sup> which reduced the required procurement target from 3,369,000 to 3,288,652, reducing the REC procurement requirement by 2.38 percent.

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<sup>4</sup> Public Utilities Code 399.30(c)(4) allows a local publicly owned electric utility when calculating its RPS procurement requirements to exclude from its total retail sales the kilowatt-hours generated by an eligible renewable energy resource that is credited to a participating customer pursuant to a voluntary green pricing or shared renewable generation program, beginning January 1, 2014, provided specified conditions are satisfied.



**Compliance Period (CP) 4 RPS Requirement Calculations**

Procurement Target Calculation (MWh)				
Calendar Year	Annual Retail Sales	Green Pricing Program	Soft Target Percentage <sup>1</sup>	Soft Targets
2021	2,054,138	0	35.75	734,354
2022	2,203,226	3,456	38.50	846,911
2023	2,089,084	89,055	41.25	825,011
2024	2,101,494	96,092	44.00	882,376
Procurement Target				3,288,652

Portfolio Balance Requirement Calculation (PBR) (MWh) <sup>2</sup>						
Procurement Target	Category 0 Applied	Total Pre June 1, 2010, Applied	Historic Carryover Applied	Category	PBR Percentage	Balance Requirements
3,288,652	1,666,235	0	0	Category 1 minimum	75	1,216,812
				Category 3 limit	10	162,241

Long-Term Procurement Requirement Calculation (MWh) <sup>3</sup>	
65% (Procurement Target)	
65% (3,288,652)	
Long-Term Procurement Requirement	2,137,623

**Compliance Period 4 Verification Results**

Procurement Target (MWh)	
Target	3,288,652
Applied	3,301,549
Deficit	0
Renewable Percentage	39.08%
RPS Portfolio Balance Requirements (MWh)	
Category 1 Balance Requirement	1,216,812
Category 1 Applied	1,510,314
Category 1 Requirement Deficit	0
Category 3 Balance Limitation	162,241
Category 3 Applied	125,000
Category 3 Disallowed	0

Long-Term Procurement Requirement	
Long-Term Procurement Requirement	2,137,623
Long-Term Applied	2,801,542
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	1,114,172		1,475,522		2,589,694
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	232,376		1,088,099	375,007	1,695,482
Category 2 (PCC 2)	0	0		0	0	0
Category 3 (PCC 3)	0			0	125,000	125,000
Historic Carryover		0				0
<b>Subtotal</b>	<b>0</b>	<b>1,346,548</b>		<b>2,563,621</b>	<b>500,007</b>	
<b>Total RECs Available</b>						<b>4,410,176</b>

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	310,874		1,355,361		1,666,235
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	232,376		902,931	375,007	1,510,314
Category 2 (PCC 2)	0	0		0	0	0
Category 3 (PCC 3)	0			0	125,000	125,000
Historic Carryover		0				0
<b>Subtotal</b>	<b>0</b>	<b>543,250</b>		<b>2,258,292</b>	<b>500,007</b>	
<b>Total RECS Applied</b>						<b>3,301,549</b>

**Excess Procurement**

CP 4 Excess Procurement Calculation (MWh) <sup>4</sup>						
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)	1,475,522		1,355,361		120,161	
Pre June 2010 PCC 1	0	0	0	0	0	0
Category 1 (PCC 1)	1,088,099	375,007	902,931	375,007	185,168	0
<b>Subtotal</b>	<b>2,563,621</b>	<b>375,007</b>	<b>2,258,292</b>	<b>375,007</b>		
<b>Total RECS Accumulated</b>					<b>305,329</b>	

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)	1,114,172		310,874		120,161		923,459	
Pre June 2010 PCC 1	0		0		0	0	0	0
Pre June 2010 PCC 2	0		0				0	
Category 1 (PCC 1)	232,376		232,376		185,168	0	185,168	0
Category 2 (PCC 2)	0		0				0	
Historic Carryover	0		0				0	
<b>Subtotal</b>	<b>1,346,548</b>		<b>543,250</b>		<b>305,329</b>	<b>0</b>		
<b>Total Ending Balance</b>							<b>1,108,627</b>	

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>
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