

DOCKETED	
Docket Number:	24-RPS-01
Project Title:	Renewables Portfolio Standard - Compliance - Period 4 (2021–2024) Verification and Compliance
TN #:	273025
Document Title:	Imperial Irrigation District - Staff Draft RPS Verification Results Report for Compliance Period 4
Description:	N/A
Filer:	Chris Metzker
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	10/2/2026 1:33:42 PM
Docketed Date:	10/2/2026



California Energy Commission

STAFF DRAFT REPORT

Renewables Portfolio Standard Verification Results

Imperial Irrigation District

Compliance Period 4 (2021–2024)

October 2026 | CEC-700-2026-039-SD

California Energy Commission

Sophia Bird
Kevin Chou
Sean Inaba
Rong (Grace) Jiang
Chang-Hsien Liao
Chris Metzker
Primary Authors

Gina Barkalow
Supervisor

Sean Simon
Acting Branch Manager
CLEAN ENERGY INFRASTRUCTURE BRANCH

Sean Simon
Deputy Director
RENEWABLES AND ELECTRICITY PLANNING

Regina Galer
Director
**SITING, TRANSMISSION, AND ENVIRONMENTAL PROTECTION
DIVISION**

Drew Bohan
Executive Director

DISCLAIMER

Staff members of the California Energy Commission (CEC) prepared this report. As such, it does not necessarily represent the views of the CEC or the State of California. The information contained in this draft is based on staff analysis and is not approved until the CEC officially adopts the final verification results report. The CEC 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 Imperial Irrigation District 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

Please use the following citation for this report:

Bird, Sophia, Kevin Chou, Sean Inaba, Rong (Grace) Jiang, Chang-Hsien Liao, Chris Metzker. 2026. *Renewables Portfolio Standard Verification Results, Imperial Irrigation District Compliance Period 4 (2021-2024)*. California Energy Commission, Siting, Transmission, and Environmental Protection Division. Publication Number: CEC-700-2026-039-SD.

RPS Verification Results: Compliance Period 4 Imperial Irrigation District

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 CEC 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 CEC 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.
- 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.

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.

In adopting this report, the CEC 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 CEC 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 CEC, 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 CEC 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 Imperial Irrigation District retired and reported 5,791,282 RECs, and 5,791,282 RECs were verified by the CEC 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 Imperial Irrigation District had a procurement target of 5,668,062 RECs, which represents the sum of all the annual soft targets of its retail sales over 2021–2024. The Imperial Irrigation District applied 5,668,062 RECs from Compliance Period 4 RPS-eligible RECs toward its procurement requirements, equaling the number of RECs needed to meet its procurement target.

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 CEC will assess a POU's procurement actions and determine whether those actions meet the RPS requirements.



Compliance Period (CP) 4 RPS Requirement Calculations

Procurement Target Calculation (MWh)			
Calendar Year	Annual Retail Sales	Soft Target Percentage ¹	Soft Targets
2021	3,515,689	35.75	1,256,858
2022	3,604,480	38.50	1,387,724
2023	3,422,282	41.25	1,411,691
2024	3,663,157	44.00	1,611,789
Procurement Target			5,668,062

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
5,668,062	548,289	98,238	0	Category 1 minimum	75	3,766,151
				Category 3 limit	10	502,153

Long-Term Procurement Requirement Calculation (MWh) ³	
65% (Procurement Target)	
65% (5,668,062)	
Long-Term Procurement Requirement	3,684,240

Compliance Period 4 Verification Results

Procurement Target (MWh)	
Target	5,668,062
Applied	5,668,062
Deficit	0
Renewable Percentage	39.9%
RPS Portfolio Balance Requirements (MWh)	
Category 1 Balance Requirement	3,766,151
Category 1 Applied	4,752,760
Category 1 Requirement Deficit	0
Category 3 Balance Limitation	502,153
Category 3 Applied	268,775
Category 3 Disallowed	0

Long-Term Procurement Requirement	
Long-Term Procurement Requirement	3,684,240
Long-Term Applied	5,399,287
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		548,289		548,289
Pre June 2010 PCC 1	0	0		86,581	0	86,581
Pre June 2010 PCC 2	0	0		2,451	0	2,451
Pre June 2010 PCC 3	0			9,206	0	9,206
Category 1 (PCC 1)	0	0		4,875,980	0	4,875,980
Category 2 (PCC 2)	0	0		0	0	0
Category 3 (PCC 3)	0			0	268,775	268,775
Historic Carryover		0				
Subtotal	0	0		5,522,507	268,775	
Total RECs Available						5,793,733

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		548,289		548,289
Pre June 2010 PCC 1	0	0		86,581	0	86,581
Pre June 2010 PCC 2	0	0		2,451	0	2,451
Pre June 2010 PCC 3	0			9,206	0	9,206
Category 1 (PCC 1)	0	0		4,752,760	0	4,752,760
Category 2 (PCC 2)	0	0		0	0	0
Category 3 (PCC 3)	0			0	268,775	268,775
Historic Carryover		0				0
Subtotal	0	0		5,399,287	268,775	
Total RECS Applied						5,668,062

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)	548,289		548,289		0	
Pre June 2010 PCC 1	86,581	0	86,581	0	0	0
Category 1 (PCC 1)	4,875,980	0	4,752,760	0	123,220	0
Subtotal	5,510,850	0	5,387,630	0		
Total RECS Accumulated					123,220	

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	123,220	0
Category 2 (PCC 2)	0		0				0	
Historic Carryover	0		0				0	
Subtotal	0		0		0	0		
Total Ending Balance							123,220	

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>