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California Energy Commission
STAFF DRAFT REPORT

Renewables Portfolio Standard Verification Results

**Los Angeles Department of Water and Power
Compliance Period 4 (2021-2024)**

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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

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ABSTRACT

This *Renewables Portfolio Standard Verification Results Report* covers the verification results for Los Angeles Department of Water and Power 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

Los Angeles Department of Water and Power

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), Los Angeles Department of Water and Power retired and reported 34,562,684 RECs, and 34,548,810 RECs were verified by the CEC 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, Los Angeles Department of Water and Power had a procurement target of 33,631,884 RECs, which represents the sum of all the annual soft targets of its retail sales over 2021–2024. Los Angeles Department of Water and Power applied 33,631,884 RECs from Compliance Period 4 RPS-eligible RECs toward its procurement requirements, equaling the number of RECs needed to meet its procurement target.

For calculating the procurement requirements, Los Angeles Department of Water and Power received a reduction in total retail sales to account for sales associated with a green pricing

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.

4 The number of RECs verified by the CEC is fewer than the number of RECs retired and reported because claims were determined ineligible due to 13 facilities not being RPS-certified when the RECs were created. Please refer to the POU's summary claims report for more detail.

program (GPP),⁵ which reduced the required procurement target from 33,698,756 to 33,631,884, reducing the REC procurement requirement by 0.19 percent.

⁵ 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 ¹	Soft Targets	
2021	20,658,079	38,195	35.75	7,371,608	
2022	21,740,065	42,018	38.50	8,353,748	
2023	20,832,656	43,719	41.25	8,575,436	
2024	21,250,223	43,195	44.00	9,331,092	
Procurement Target				33,631,884	

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
33,631,884	6,751,395	1,151,056	0	Category 1 minimum	75	19,297,074
				Category 3 limit	10	2,572,943

Long-Term Procurement Requirement Calculation (MWh) ³	
65% (Procurement Target)	
65% (33,631,884)	
Long-Term Procurement Requirement	21,860,724

Compliance Period 4 Verification Results

Procurement Target (MWh)	
Target	33,631,884
Applied	33,631,884
Deficit	0
Renewable Percentage	39.81%
RPS Portfolio Balance Requirements (MWh)	
Category 1 Balance Requirement	19,297,074
Category 1 Applied	23,448,399
Category 1 Requirement Deficit	0
Category 3 Balance Limitation	2,572,943
Category 3 Applied	2,234,207
Category 3 Disallowed	0

Long-Term Procurement Requirement	
Long-Term Procurement Requirement	21,860,724
Long-Term Applied	31,087,434
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		6,751,395		6,751,395
Pre June 2010 PCC 1	0	0		1,151,056	0	1,151,056
Pre June 2010 PCC 2	0	0		0	0	0
Pre June 2010 PCC 3	0			0	0	0
Category 1 (PCC 1)	0	4,364,391		24,055,082	310,243	28,729,716
Category 2 (PCC 2)	0	0		46,827	0	46,827
Category 3 (PCC 3)	0			0	2,234,207	2,234,207
Historic Carryover		0				0
Subtotal	0	4,364,391	0	32,004,360	2,544,450	
Total RECs Available						38,913,201

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		6,751,395		6,751,395
Pre June 2010 PCC 1	0	0		1,151,056	0	1,151,056
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		23,138,156	310,243	23,448,399
Category 2 (PCC 2)	0	0		46,827	0	46,827
Category 3 (PCC 3)	0			0	2,234,207	2,234,207
Historic Carryover		0				0
Subtotal	0	0		31,087,434	2,544,450	
Total RECS Applied						33,631,884

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)	6,751,395		6,751,395		0	
Pre June 2010 PCC 1	1,151,056	0	1,151,056	0	0	0
Category 1 (PCC 1)	24,055,082	310,243	23,138,156	310,243	916,926	0
Subtotal	31,957,533	310,243	31,040,607	310,243		
Total RECS Accumulated					916,926	

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)	4,364,391		0		916,926	0	5,281,317	0
Category 2 (PCC 2)	0		0				0	
Historic Carryover	0						0	
Subtotal	4,364,391		0		916,926	0		
Total Ending Balance							5,281,317	

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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