

DOCKETED	
Docket Number:	24-RPS-01
Project Title:	Renewables Portfolio Standard - Compliance - Period 4 (2021–2024) Verification and Compliance
TN #:	273018
Document Title:	Pasadena Water and Power - 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 1:39:51 PM
Docketed Date:	10/2/2026



California Energy Commission
STAFF DRAFT REPORT

Renewables Portfolio Standard Verification Results

**Pasadena Water and Power
Compliance Period 4 (2021-2024)**

October 2026 | CEC-700-2026-046-SD

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 Pasadena 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

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, Pasadena Water and Power Compliance Period 4 (2021-2024)*. California Energy Commission, Siting, Transmission, and Environmental Protection Division. Publication Number: CEC-700-2026-046-SD.

RPS Verification Results: Compliance Period 4

Pasadena 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), Pasadena Water and Power retired and reported 1,606,804 RECs, and 1,607,193 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, Pasadena Water and Power had a procurement target of 1,516,078 RECs, which represents the sum of all the annual soft targets of its retail sales over 2021–2024. Pasadena Water and Power applied 1,548,622 RECs from Compliance Period 4 RPS-eligible RECs toward its procurement requirements, exceeding the number of RECs needed to meet its procurement target.

For calculating the procurement requirements, Pasadena Water and Power received a reduction in total retail sales to account for sales associated with a green pricing program

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 209 claims were withdrawn by the POU. Please refer to the POU's summary claims report for more detail.

(GPP),⁵ which reduced the required procurement target from 1,586,231 to 1,516,078, reducing the REC procurement requirement by 0.04 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	917,741	43,906	35.75	312,396
2022	1,031,349	45,671	38.50	379,486
2023	1,026,282	41,530	41.25	406,210
2024	994,840	44,870	44.00	417,986
Procurement Target				1,516,078

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
1,516,078	173,404	0	0	Category 1 minimum	75	1,007,005
				Category 3 limit	10	134,267

Long-Term Procurement Requirement Calculation (MWh) ³	
65% (Procurement Target)	
65% (1,516,078)	
Long-Term Procurement Requirement	985,450

Compliance Period 4 Verification Results

Procurement Target (MWh)	
Target	1,516,078
Applied	1,548,622
Deficit	0
Renewable Percentage	39.01
RPS Portfolio Balance Requirements (MWh)	
Category 1 Balance Requirement	1,007,005
Category 1 Applied	1,011,007
Category 1 Requirement Deficit	0
Category 3 Balance Limitation	134,267
Category 3 Applied	148,922
Category 3 Disallowed	14,655

Long-Term Procurement Requirement	
Long-Term Procurement Requirement	985,450
Long-Term Applied	985,451
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		173,404		173,404
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	45,918		733,960	320,574	1,100,452
Category 2 (PCC 2)	0	0		55,000	174,944	229,944
Category 3 (PCC 3)	0			63,030	85,892	148,922
Historic Carryover		0				0
Subtotal	0	45,918	0	1,025,394	581,410	
Total RECs Available						1,652,722

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		173,404		173,404
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		694,017	316,990	1,011,007
Category 2 (PCC 2)	0	0		55,000	174,944	229,944
Category 3 (PCC 3)	0			63,030	85,892	148,922
Historic Carryover		0				0
Subtotal	0	0		985,451	577,826	
Total RECS Applied						1,563,277

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)	173,404		173,404		0	
Pre June 2010 PCC 1	0	0	0	0	0	0
Category 1 (PCC 1)	733,960	320,574	694,017	316,990	39,943	3,584
Subtotal	907,364	320,574	867,421	316,990		
Total RECS Accumulated						43,527

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)	45,918		0		39,943	3,584	85,861	3,584
Category 2 (PCC 2)	0		0				0	
Historic Carryover	0		0				0	
Subtotal	45,918		0		39,943	3,584		
Total Ending Balance							89,445	

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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