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California Energy Commission

STAFF DRAFT REPORT

Renewables Portfolio Standard Verification Results

**San Francisco Public Utilities Commission – Hetch
Hetchy Power**

Compliance Period 4 (2021–2024)

October 2026 | CEC-700-2026-047-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 the San Francisco Public Utilities Commission – Hetch Hetchy 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 San Francisco Public Utilities Power – Hetch Hetchy 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.

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 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

As discussed more in depth below, the SFPUC – Hetch Hetchy Power's verification results are reported and evaluated under alternative procurement requirements and on an annual, rather than compliance period, basis. Public Utilities Code (PUC) Section 399.30 (j) establishes alternative procurement requirements for a POU in a city and county that receives greater than 67 percent of its electricity sources from in-state owned hydroelectric facilities. To qualify, a POU must show that it meets the requirements of 20 CCR Section 3204 (b)(3) of the RPS POU Regulations by submitting documentation showing that it receives at least an average of 67 percent of its electricity demand in the twenty years preceding each compliance period from qualifying hydroelectric generation.

If a POU can show that it meets the criteria for the alternative procurement requirements, the POU's procurement target is determined annually, instead of on a compliance period basis,

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.

and the POU is exempt from the portfolio balance requirements. If the POU has electricity demand that is not satisfied by its qualifying hydroelectric generation in any given year, the POU's procurement target is set at the lesser of the following:

1. The portion of the POU's electricity demand that is not satisfied by the POU's qualifying hydroelectric generation.
2. The soft target corresponding to that year.

To determine the POU's procurement target for any given year, the POU must report its electricity demand, instead of retail sales, and its qualifying hydroelectric generation.

The SFPUC – Hetch Hetchy Power provided documentation demonstrating that it qualifies for the alternative procurement requirements in 20 CCR Section 3204 (b)(3) of the RPS POU Regulations during Compliance Period (CP) 4. Therefore, the SFPUC – Hetch Hetchy Power must meet stand-alone procurement targets in 2021, 2022, 2023, and 2024 that are determined by the annual amount of electricity demand that was not satisfied by the SFPUC – Hetch Hetchy Power's qualifying hydroelectric generation. Furthermore, the SFPUC – Hetch Hetchy Power does not have a Category 1 portfolio balance requirement, a limitation on Category 3 procurement, or the Long-Term Procurement requirement during Compliance Years 2021-2024. Each [POU's summary claims report](https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard/renewables), 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 Year 2021, the SFPUC – Hetch Hetchy Power retired and reported 447,488 RECs, and 0 RECs were verified by the CEC as RPS-eligible.⁴ The SFPUC – Hetch Hetchy Power's electricity demand that was not satisfied by qualifying hydroelectric generation was equal to 63,972 RECs, which represents 7.3 percent of its total electricity demand. The SFPUC – Hetch Hetchy Power applied 63,972 RECs from excess procurement toward its procurement requirements, equaling the number of RECs needed to meet its annual procurement target.

For Compliance Year 2022, the SFPUC – Hetch Hetchy Power retired and reported 401,096 RECs, and 54,204 RECs were verified by the CEC as RPS-eligible.⁵ The SFPUC – Hetch Hetchy Power's electricity demand that was not satisfied by qualifying hydroelectric generation was equal to 3,135 RECs, which represents 0.34 percent of its total electricity demand. The SFPUC – Hetch Hetchy Power applied 3,135 RECs from CP 4 RPS-eligible RECs toward its procurement requirements, equaling the number of RECs needed to meet its annual procurement target.

⁴ The number of RECs verified by the CEC is fewer than the number of RECs retired and reported because in aggregate, 55,045 RECs were determined ineligible due to RECs being retired more than 36 months after the vintage and exceeded the allowable generation. An additional 392,443 RECs were withdrawn by LSE. Please refer to the POU's summary claims report for more detail.

⁵ The number of RECs verified by the CEC is fewer than the number of RECs retired and reported because 346,892 RECs were withdrawn by LSE. Please refer to the POU's summary claims report for more detail.

For Compliance Year 2023, the SFPUC – Hetch Hetchy Power retired and reported 344,170 RECs, and 81,000 RECs were verified by the CEC as RPS-eligible.⁶ The SFPUC – Hetch Hetchy Power’s electricity demand that was not satisfied by qualifying hydroelectric generation was equal to 8,200 RECs, which represents 0.87 percent of its total electricity demand. The SFPUC – Hetch Hetchy Power applied 8,200 RECs from CP 4 RPS-eligible RECs toward its procurement requirements, equaling the number of RECs needed to meet its annual procurement target.

For Compliance Year 2024, the SFPUC – Hetch Hetchy Power retired and reported 241,500 RECs, and 49,567 RECs were verified by the CEC as RPS-eligible.⁷ The SFPUC – Hetch Hetchy Power’s electricity demand that was not satisfied by qualifying hydroelectric generation was equal to 12,352 RECs, which represents 1.28 percent of its total electricity demand. The SFPUC – Hetch Hetchy Power applied 12,352 RECs from CP 4 RPS-eligible RECs toward its procurement requirements, equaling the number of RECs needed to meet its annual procurement target.

The SFPUC – Hetch Hetchy Power retired and applied sufficient RECs to meet each annual procurement target for each year 2021 – 2024.

6 The number of RECs verified by the CEC is fewer than the number of RECs retired and reported because 420 RECs were determined ineligible due to RECs being retired more than 36 months after the vintage. An additional 262,750 RECs were withdrawn by LSE. Please refer to the POU’s summary claims report for more detail.

7 The number of RECs verified by the CEC is fewer than the number of RECs retired and reported because in aggregate, 10,693 RECs were determined ineligible due to RECs being retired more than 36 months after the vintage and facility was not RPS-Certified when RECs were created. An additional 181,240 RECs were withdrawn by LSE. Please refer to the POU’s summary claims report for more detail.



Compliance Period (CP) 4 RPS Requirement Calculations

Procurement Target Calculation (MWh)					
Calendar Year	Total Electricity Demand Verified	Qualifying Hydroelectric Generation	Electricity Demand not met by Hydroelectric Generation	Soft Target Percentage ¹	Soft Targets
2021	876,315	812,343	63,972	35.75	313,282
Procurement Target					63,972

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
63,972	0	63,972	0	Category 1 minimum	75	N/A
				Category 3 limit	10	N/A

Long-Term Procurement Requirement Calculation (MWh) ³	
65% (Procurement Target)	
65% (N/A)	
Long-Term Procurement Requirement	N/A

Compliance Year 2021 Verification Results

Procurement Target (MWh)	
Target	63,972
Applied	63,972
Deficit	0
Renewable Percentage	7.3%
RPS Portfolio Balance Requirements (MWh)	
Category 1 Balance Requirement	N/A
Category 1 Applied	N/A
Category 1 Requirement Deficit	N/A
Category 3 Balance Limitation	N/A
Category 3 Applied	N/A
Category 3 Disallowed	N/A

Long-Term Procurement Requirement	
Long-Term Procurement Requirement	N/A
Long-Term Applied	N/A
Long-Term Procurement Requirement Deficit	N/A
Optional Compliance Measures Applied	
Cost Limitation	No
Delay of Timely Compliance	No
Portfolio Balance Reduction	N/A

RECs Available and Applied in Compliance Year 2021

RECs Available (MWh)						
Portfolio Content Category (PCC)	Surplus RECs	Prior Balances Available		Eligible RECs Retired in 2021		Total RECs Available
		Long-Term	Short-Term	Long-Term	Short-Term	
Category 0 (PCC 0)	0	9,452		0		9,452
Pre June 2010 PCC 1	0	1,258,896		0	0	1,258,896
Pre June 2010 PCC 2	0	0		0	0	0
Pre June 2010 PCC 3	0			0	0	0
Category 1 (PCC 1)	0	3,264		0	0	3,264
Category 2 (PCC 2)	0	0		0	0	0
Category 3 (PCC 3)	0			0	0	0
Historic Carryover		0				0
Subtotal	0	1,271,612		0	0	
Total RECs Available						1,271,612

2021 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		0		0
Pre June 2010 PCC 1	0	63,972		0	0	63,972
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		0	0	0
Category 2 (PCC 2)	0	0		0	0	0
Category 3 (PCC 3)	0			0	0	0
Historic Carryover		0				0
Subtotal	0	63,972		0	0	
Total RECS Applied						63,972

Excess Procurement

2021 Excess Procurement Calculation (MWh) ⁴						
Portfolio Content Category (PCC)	2021 Eligible RECs Retired		2021 RECs Applied		2021 Accumulated	
	Long-Term	Short-Term	Long-Term	Short-Term	Long-Term	Short-Term
Category 0 (PCC 0)	0		0		0	
Pre June 2010 PCC 1	0	0	0	0	0	0
Category 1 (PCC 1)	0	0	0	0	0	0
Subtotal	0	0	0	0		
Total RECS Accumulated						0

Balance of Excess Procurement and Historic Carryover (MWh)								
Portfolio Content Category (PCC)	Beginning Balance		Applied in 2021		Accumulated in 2021		Ending Balance	
	Long-Term	Short-Term	Long-Term	Short-Term	Long-Term	Short-Term	Long-Term	Short-Term
Category 0 (PCC 0)	9,452		0		0		9,452	
Pre June 2010 PCC 1	1,258,896		63,972		0	0	1,194,924	0
Pre June 2010 PCC 2	0		0				0	
Category 1 (PCC 1)	3,264		0		0	0	3,264	0
Category 2 (PCC 2)	0		0				0	
Historic Carryover	0		0				0	
Subtotal	1,271,612		63,972		0	0		
Total Ending Balance							1,207,640	

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](#).



Compliance Period (CP) 4 RPS Requirement Calculations

Procurement Target Calculation (MWh)					
Calendar Year	Total Electricity Demand Verified	Qualifying Hydroelectric Generation	Electricity Demand not met by Hydroelectric Generation	Soft Target Percentage ⁵	Soft Targets
2022	921,414	918,279	3,135	38.5	354,744
Procurement Target					3,135

Portfolio Balance Requirement Calculation (PBR) (MWh) ⁶						
Procurement Target	Category 0 Applied	Total Pre June 1, 2010, Applied	Historic Carryover Applied	Category	PBR Percentage	Balance Requirements
3,135	0	3,135	0	Category 1 minimum	75	N/A
				Category 3 limit	10	N/A

Long-Term Procurement Requirement Calculation (MWh) ⁷	
65% (Procurement Target)	
65% (N/A)	
Long-Term Procurement Requirement	N/A

Compliance Year 2022 Verification Results

Procurement Target (MWh)	
Target	3,135
Applied	3,135
Deficit	0
Renewable Percentage	0.34%
RPS Portfolio Balance Requirements (MWh)	
Category 1 Balance Requirement	N/A
Category 1 Applied	N/A
Category 1 Requirement Deficit	N/A
Category 3 Balance Limitation	N/A
Category 3 Applied	N/A
Category 3 Disallowed	N/A

Long-Term Procurement Requirement	
Long-Term Procurement Requirement	N/A
Long-Term Applied	N/A
Long-Term Procurement Requirement Deficit	N/A
Optional Compliance Measures Applied	
Cost Limitation	No
Delay of Timely Compliance	No
Portfolio Balance Reduction	N/A

RECs Available and Applied in Compliance Year 2022

RECs Available (MWh)						
Portfolio Content Category (PCC)	Surplus RECs	Prior Balances Available		Eligible RECs Retired in 2022		Total RECs Available
		Long-Term	Short-Term	Long-Term	Short-Term	
Category 0 (PCC 0)	0	9,452		7,838		17,290
Pre June 2010 PCC 1	0	1,194,924		45,189	0	1,240,113
Pre June 2010 PCC 2	0	0		0	0	0
Pre June 2010 PCC 3	0			0	0	0
Category 1 (PCC 1)	0	3,264		1,177	0	4,441
Category 2 (PCC 2)	0	0		0	0	0
Category 3 (PCC 3)	0			0	0	0
Historic Carryover		0				0
Subtotal	0	1,207,640		54,204	0	
Total RECs Available						1,261,844

2022 RECs Applied (MWh)						
Portfolio Content Category (PCC)	Surplus RECs	Prior Balances Applied		Eligible RECs Retired in 2022		Total RECs Applied
		Long-Term	Short-Term	Long-Term	Short-Term	
Category 0 (PCC 0)	0	0		0		0
Pre June 2010 PCC 1	0	0		3,135	0	3,135
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		0	0	0
Category 2 (PCC 2)	0	0		0	0	0
Category 3 (PCC 3)	0			0	0	0
Historic Carryover		0				0
Subtotal	0	0		3,135	0	
Total RECS Applied						3,135

Excess Procurement

2022 Excess Procurement Calculation (MWh) ⁸						
Portfolio Content Category (PCC)	2022 Eligible RECs Retired		2022 RECs Applied		2022 Accumulated	
	Long-Term	Short-Term	Long-Term	Short-Term	Long-Term	Short-Term
Category 0 (PCC 0)	7,838		0		7,838	
Pre June 2010 PCC 1	45,189	0	3,135	0	42,054	0
Category 1 (PCC 1)	1,177	0	0	0	1,177	0
Subtotal	54,204	0	3,135	0		
Total RECS Accumulated					51,069	

Balance of Excess Procurement and Historic Carryover (MWh)								
Portfolio Content Category (PCC)	Beginning Balance		Applied in 2022		Accumulated in 2022		Ending Balance	
	Long-Term	Short-Term	Long-Term	Short-Term	Long-Term	Short-Term	Long-Term	Short-Term
Category 0 (PCC 0)	9,452		0		7,838		17,290	
Pre June 2010 PCC 1	1,194,924		0		42,054	0	1,236,978	0
Pre June 2010 PCC 2	0		0				0	
Category 1 (PCC 1)	3,264		0		1,177	0	4,441	0
Category 2 (PCC 2)	0		0				0	
Historic Carryover	0		0				0	
Subtotal	1,207,640		0		51,069	0		
Total Ending Balance							1,258,709	

5 "Soft Target" is defined in Section 3204(a)(4) of the [RPS POU Regulations](#).

6 Calculated as specified in Section 3204(c)(3) of the [RPS POU Regulations](#).

7 Calculated as specified in Section 3204(d)(1) of the [RPS POU Regulations](#).

8 Calculated as described in the [RPS Verification Methodology Report, Fourth Edition](#) and in Section 3206(a)(1) of the [RPS POU Regulations](#).



Compliance Period (CP) 4 RPS Requirement Calculations

Procurement Target Calculation (MWh)					
Calendar Year	Total Electricity Demand Verified	Qualifying Hydroelectric Generation	Electricity Demand not met by Hydroelectric Generation	Soft Target Percentage ⁹	Soft Targets
2023	940,796	932,596	8,200	41.25	388,078
Procurement Target					8,200

Portfolio Balance Requirement Calculation (PBR) (MWh) ¹⁰						
Procurement Target	Category 0 Applied	Total Pre June 1, 2010, Applied	Historic Carryover Applied	Category	PBR Percentage	Balance Requirements
8,200	0	8,200	0	Category 1 minimum	75	N/A
				Category 3 limit	10	N/A

Long-Term Procurement Requirement Calculation (MWh) ¹¹	
65% (Procurement Target)	
65% (N/A)	
Long-Term Procurement Requirement	N/A

Compliance Year 2023 Verification Results

Procurement Target (MWh)	
Target	8,200
Applied	8,200
Deficit	0
Renewable Percentage	0.87%
RPS Portfolio Balance Requirements (MWh)	
Category 1 Balance Requirement	N/A
Category 1 Applied	N/A
Category 1 Requirement Deficit	N/A
Category 3 Balance Limitation	N/A
Category 3 Applied	N/A
Category 3 Disallowed	N/A

Long-Term Procurement Requirement	
Long-Term Procurement Requirement	N/A
Long-Term Applied	N/A
Long-Term Procurement Requirement Deficit	N/A
Optional Compliance Measures Applied	
Cost Limitation	No
Delay of Timely Compliance	No
Portfolio Balance Reduction	N/A

RECs Available and Applied in Compliance Year 2023

RECs Available (MWh)						
Portfolio Content Category (PCC)	Surplus RECs	Prior Balances Available		Eligible RECs Retired in 2023		Total RECs Available
		Long-Term	Short-Term	Long-Term	Short-Term	
Category 0 (PCC 0)	0	17,290		6,642		23,932
Pre June 2010 PCC 1	0	1,236,978		73,258	0	1,310,236
Pre June 2010 PCC 2	0	0		0	0	0
Pre June 2010 PCC 3	0			0	0	0
Category 1 (PCC 1)	0	4,441		1,100	0	5,541
Category 2 (PCC 2)	0	0		0	0	0
Category 3 (PCC 3)	0			0	0	0
Historic Carryover		0				0
Subtotal	0	1,258,709		81,000	0	
Total RECs Available						1,339,709

2023 RECs Applied (MWh)						
Portfolio Content Category (PCC)	Surplus RECs	Prior Balances Applied		Eligible RECs Retired in 2023		Total RECs Applied
		Long-Term	Short-Term	Long-Term	Short-Term	
Category 0 (PCC 0)	0	0		0		0
Pre June 2010 PCC 1	0	0		8,200	0	8,200
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		0	0	0
Category 2 (PCC 2)	0	0		0	0	0
Category 3 (PCC 3)	0			0	0	0
Historic Carryover		0				0
Subtotal	0	0		8,200	0	
Total RECS Applied						8,200

Excess Procurement

2023 Excess Procurement Calculation (MWh) ¹²						
Portfolio Content Category (PCC)	2023 Eligible RECs Retired		2023 RECs Applied		2023 Accumulated	
	Long-Term	Short-Term	Long-Term	Short-Term	Long-Term	Short-Term
Category 0 (PCC 0)	6,642		0		6,642	
Pre June 2010 PCC 1	73,258	0	8,200	0	65,058	0
Category 1 (PCC 1)	1,100	0	0	0	1,100	0
Subtotal	81,000	0	8,200	0		
Total RECS Accumulated					72,800	

Balance of Excess Procurement and Historic Carryover (MWh)								
Portfolio Content Category (PCC)	Beginning Balance		Applied in 2023		Accumulated in 2023		Ending Balance	
	Long-Term	Short-Term	Long-Term	Short-Term	Long-Term	Short-Term	Long-Term	Short-Term
Category 0 (PCC 0)	17,290		0		6,642		23,932	
Pre June 2010 PCC 1	1,236,978		0		65,058	0	1,302,036	0
Pre June 2010 PCC 2	0		0				0	
Category 1 (PCC 1)	4,441		0		1,100	0	5,541	0
Category 2 (PCC 2)	0		0				0	
Historic Carryover	0		0				0	
Subtotal	1,258,709		0		72,800	0		
Total Ending Balance							1,331,509	

9 "Soft Target" is defined in Section 3204(a)(4) of the [RPS POU Regulations](#).

10 Calculated as specified in Section 3204(c)(3) of the [RPS POU Regulations](#).

11 Calculated as specified in Section 3204(d)(1) of the [RPS POU Regulations](#).

12 Calculated as described in the [RPS Verification Methodology Report, Fourth Edition](#) and in Section 3206(a)(1) of the [RPS POU Regulations](#).



Compliance Period (CP) 4 RPS Requirement Calculations

Procurement Target Calculation (MWh)					
Calendar Year	Total Electricity Demand Verified	Qualifying Hydroelectric Generation	Electricity Demand not met by Hydroelectric Generation	Soft Target Percentage ¹³	Soft Targets
2024	961,296	948,944	12,352	44.00	422,970
Procurement Target					12,352

Portfolio Balance Requirement Calculation (PBR) (MWh) ¹⁴						
Procurement Target	Category 0 Applied	Total Pre June 1, 2010, Applied	Historic Carryover Applied	Category	PBR Percentage	Balance Requirements
12,352	0	12,352	0	Category 1 minimum	75	N/A
				Category 3 limit	10	N/A

Long-Term Procurement Requirement Calculation (MWh) ¹⁵	
65% (Procurement Target)	
65% (N/A)	
Long-Term Procurement Requirement	N/A

Compliance Year 2024 Verification Results

Procurement Target (MWh)	
Target	12,352
Applied	12,352
Deficit	0
Renewable Percentage	1.28%
RPS Portfolio Balance Requirements (MWh)	
Category 1 Balance Requirement	N/A
Category 1 Applied	N/A
Category 1 Requirement Deficit	N/A
Category 3 Balance Limitation	N/A
Category 3 Applied	N/A
Category 3 Disallowed	N/A

Long-Term Procurement Requirement	
Long-Term Procurement Requirement	N/A
Long-Term Applied	N/A
Long-Term Procurement Requirement Deficit	N/A
Optional Compliance Measures Applied	
Cost Limitation	No
Delay of Timely Compliance	No
Portfolio Balance Reduction	N/A

RECs Available and Applied in Compliance Year 2024

RECs Available (MWh)						
Portfolio Content Category (PCC)	Surplus RECs	Prior Balances Available		Eligible RECs Retired in 2024		Total RECs Available
		Long-Term	Short-Term	Long-Term	Short-Term	
Category 0 (PCC 0)	0	23,932		7,472		31,404
Pre June 2010 PCC 1	0	1,302,036		40,718	0	1,342,754
Pre June 2010 PCC 2	0	0		0	0	0
Pre June 2010 PCC 3	0			0	0	0
Category 1 (PCC 1)	0	5,541		1,377	0	6,918
Category 2 (PCC 2)	0	0		0	0	0
Category 3 (PCC 3)	0			0	0	0
Historic Carryover		0				0
Subtotal	0	1,331,509		49,567	0	
Total RECs Available						1,381,076

2024 RECs Applied (MWh)						
Portfolio Content Category (PCC)	Surplus RECs	Prior Balances Applied		Eligible RECs Retired in 2024		Total RECs Applied
		Long-Term	Short-Term	Long-Term	Short-Term	
Category 0 (PCC 0)	0	0		0		0
Pre June 2010 PCC 1	0	0		12,352	0	12,352
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		0	0	0
Category 2 (PCC 2)	0	0		0	0	0
Category 3 (PCC 3)	0			0	0	0
Historic Carryover		0				0
Subtotal	0	0		12,352	0	
Total RECS Applied						12,352

Excess Procurement

2024 Excess Procurement Calculation (MWh) ¹⁶						
Portfolio Content Category (PCC)	2024 Eligible RECs Retired		2024 RECs Applied		2024 Accumulated	
	Long-Term	Short-Term	Long-Term	Short-Term	Long-Term	Short-Term
Category 0 (PCC 0)	7,472		0		7,472	
Pre June 2010 PCC 1	40,718	0	12,352	0	28,366	0
Category 1 (PCC 1)	1,377	0	0	0	1,377	0
Subtotal	49,567	0	12,352	0		
Total RECS Accumulated					37,215	

Balance of Excess Procurement and Historic Carryover (MWh)								
Portfolio Content Category (PCC)	Beginning Balance		Applied in 2024		Accumulated in 2024		Ending Balance	
	Long-Term	Short-Term	Long-Term	Short-Term	Long-Term	Short-Term	Long-Term	Short-Term
Category 0 (PCC 0)	23,932		0		7,472		31,404	
Pre June 2010 PCC 1	1,302,036		0		28,366	0	1,330,402	0
Pre June 2010 PCC 2	0		0				0	
Category 1 (PCC 1)	5,541		0		1,377	0	6,918	0
Category 2 (PCC 2)	0		0				0	
Historic Carryover	0		0				0	
Subtotal	0		0		0	0		
Total Ending Balance							1,368,724	

13 "Soft Target" is defined in Section 3204(a)(4) of the [RPS POU Regulations](#).

14 Calculated as specified in Section 3204(c)(3) of the [RPS POU Regulations](#).

15 Calculated as specified in Section 3204(d)(1) of the [RPS POU Regulations](#).

16 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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