

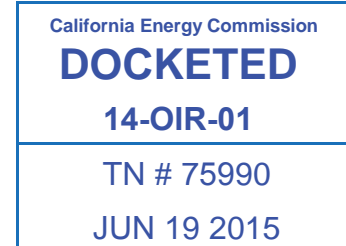


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June 19, 2015 | Submitted Electronically

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 14-OIR-01
1516 Ninth Street
Sacramento, California 95814-5512



RE: SCPPA Comments on the Rulemaking to Consider Modifications to the Electricity Generation Source Disclosure Regulations – Docket No. 14-OIR-01.

The Southern California Public Power Authority (SCPPA) appreciates the opportunity to submit these comments to help inform refinement of the Power Source Disclosure Program – and specifically revisions to the Power Content Label. Our recommendations to amendments being considered by Energy Commission staff and the need for further improvements are summarized as follows:

- **Align Reporting Deadline with WREGIS.** SCPPA recommends that the June 1 reporting deadline be retained to ensure alignment with the creation timeline of the Renewables Portfolio Standard (RPS) Program's Western Renewable Energy Generation Information System (WREGIS) Renewable Energy Certificates (RECs). An April 1 deadline would make it nearly impossible for utilities to accurately comply with reporting requirements due to the current 90-day timeframe in which WREGIS RECs are created (though RECs typically do not appear in one's WREGIS account until approximately two weeks after the 90-day cycle) – much less the need to account for any reconciliation and correcting of errors – required for reporting renewables. This is a particularly important issue for SCPPA, whose staff administers the WREGIS RECs for numerous joint renewables projects amongst our Members and requires sufficient time for the analysis and distribution of RECs and e-Tag matching across Members from those projects, which includes "true-ups" and prior period adjustments that have not been created yet or any issues with e-Tags. Furthermore, the **June 1** deadline more closely corresponds with timing for publicly-owned utilities' RPS reports; an April 1 reporting deadline would only create discrepancies between the PCL and RPS reports – particularly if a Member does not receive all RECs created or transferred into WREGIS by the end of March due to the certificate creation timeline described above.
- **Customer Considerations.** While the annual reporting of renewable energy percentages has been part of the PCL since 1997, enactment of Senate Bill X1-2 in April 2011 revised California's RPS requirements and has created a misalignment on the renewables percentage presented by the PCL on an *annual basis* and the percentage for the RPS Requirements, which is calculated for the compliance periods (on a *three-year basis*). SCPPA appreciates the Energy Commission staff's recognition of this misalignment by proposing an amendment to clarify that information provided in a PCL is different than what is reported under the RPS Program. However, it should be clearly stated that the PCL is the electricity that flowed for retail consumption and is not the regulatory compliance mechanism. Consistent with the intent of the Power Content Label, to provide customers with "accurate, reliable, and **simple to understand** information on the sources of energy that are used to provide electric services," and to avoid confusion with the "renewable percentages" set by the RPS Requirements, the Power Content Label should be modified to identify specific renewable energy resource percentages (e.g., solar, wind, biomass and waste, geothermal, small hydroelectric).
 - SCPPA therefore recommends removing the "roll up" requirement for reporting renewables as a percentage of the total on the PCL itself to avoid customer and general public confusion. Utilities are not required to "roll up" conventional generation and should similarly not be required to do so for renewables resources.

- Staff should also consider how customers can simply understand what is considered a renewable resource under California's RPS Program (e.g., why Hoover Dam is not considered a renewable resource though it generates no greenhouse gas emissions).
- **Reporting Improvements.** SCPPA recommends that the following improvements be made to streamline data reporting and minimize administrative burdens on limited staff resources, which has doubled in recent years:
 - Utilize the same upload for the RPS in a sole database.
 - Consolidate contract reporting such that "wind" resources, for example, are reported on one line, rather than listing every individual entity where the power was procured from (or list by region instead of contract if that information is absolutely required). SCPPA notes that detailed information on renewables projects is already reported through mandatory RPS reporting requirements and that information on long-term contracts is already supplied through the Integrated Energy Policy Report process as well for all electricity resources.
 - Ensure that California's prior year electricity mix is posted early enough to be used in the published document sent to publicly-owned utility customers.
 - Ensure that disclosure can be mailed **or** emailed with an acknowledgement – instead of email **and** mail for the RPS POU compliance.
 - Solicit input from end-use stakeholders that will fill out any new forms to verify that both the calculations are correct and that the data can be gathered in a streamlined manner prior to finalization.
- **RPS Integration.** The Power Source Disclosure Program should be integrated into the RPS Program to better represent a utility's progress towards meeting local and state RPS targets on a per-compliance period basis. This would significantly streamline reporting for utilities, minimize customer confusion, and help local governing boards consistently mark RPS progress and achievements. SCPPA also recommends that definitions be consistent among all renewables-related reporting, including:
 - The definition of "facility" should align with the RPS definition and allow for facilities to be registered and/or counted on a per-unit basis. We recommend that this definition remain unchanged.
 - The definition of small hydroelectric facilities should be modified as follows to be consistent with the RPS categorization of different small hydroelectric facilities:

*"Small hydroelectric" means the power source created when water flows from a higher elevation to a lower elevation and that is converted into electrical energy in one or more generators at a single facility, the sum capacity of which does not exceed 30 megawatts **OR a hydroelectric generating unit with a nameplate capacity not exceeding 40 megawatts that is operated as part of a water supply or conveyance system.***
- **Footnotes.** SCPPA recommends that language be added to the regulations allowing utilities to add their own footnotes to the Power Content Label (in addition to the mandatory footnotes required by the Energy Commission) to help minimize customer confusion and mark progress towards meeting local and state goals.

Thank you for your time and consideration of SCPPA's comments. We greatly appreciate the opportunity to provide stakeholder input on the Energy Commission staff's efforts to refine the Power Source Disclosure Program, and the Power Content Label specifically.

Respectfully submitted,



Tanya DeRivi
Director of Government Affairs