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Comments of PacifiCorp on the Future Edition of the Renewables Portfolio Standard Eligibility Guidebook

Additional submitted attachment is included below.

STATE OF CALIFORNIA

ENERGY RESOURCE CONSERVATION AND DEVELOPMENT COMMISSION

In the matter of:

Developing Guidelines for the 50 Percent
Renewables Portfolio Standard.

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**COMMENTS OF PACIFICORP ON THE FUTURE EDITION OF THE RENEWABLES
PORTFOLIO STANDARD ELIGIBILITY GUIDEBOOK**

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PORTFOLIO STANDARD ELIGIBILITY GUIDEBOOK**

PacifiCorp appreciates this opportunity to provide comments on expected changes to the California Energy Commission's (Commission's) next edition of the *Renewables Portfolio Standard Eligibility Guidebook* (RPS Guidebook). For the next RPS Guidebook, PacifiCorp recommends that the Commission: (1) defer implementing the RPS Online System until the RPS Online System has been fully vetted, and (2) avoid overly burdensome requirements of identifying the boundaries of renewable facilities.

The March 3, 2016 Notice of Staff Workshop on Future Edition of Renewables Portfolio Standard Eligibility Guidebook (March 3rd Notice) included the following topic as an expected substantive change to the RPS Guidebook:

Incorporating changes to address the launch of the RPS Online System which would change the process of submitting RPS certification applications, requests for time extension for certification applications and the creation of retroactive RECs in WREGIS, and the annual facility and load-serving entity reports.¹

Although PacifiCorp supports the Commission's effort to streamline and simplify RPS reporting through the use of the RPS Online System, PacifiCorp shares concerns expressed at the March 17th workshop that incorporating the RPS Online System into the next edition of the RPS

¹ March 3rd Notice, p. 2.

Guidebook may be overly ambitious and may not provide sufficient time to fully vet the RPS Online System. PacifiCorp appreciates that the Commission will host workshops and tutorials to provide opportunities for review and refinement to the RPS Online System. However, given that PacifiCorp has had no opportunity to date to use or review any aspect of the RPS Online System, and given the tentative schedule to release the 9th Edition of the RPS Guidebook in June, PacifiCorp is concerned that sufficient time will not be provided to fully review and optimize the RPS Online System prior to its implementation. Rather than rush to implement a potentially flawed system, PacifiCorp recommends that the Commission take a more conservative approach and provide ample time to fully vet, review, and refine the RPS Online System prior to its implementation. If, however, the Commission does move forward with incorporating the RPS Online System into the next edition of the RPS Guidebook, it is essential that the Commission provide a detailed schedule of how the RPS Online System will be developed and implemented as soon as possible, while ensuring that stakeholders are provided sufficient time for meaningful participation in the RPS Online System's design and development.

The March 3rd Notice also included the following topic as an expected nonsubstantive change to the RPS Guidebook:

Clarifying the facility location to address mapping issues and avoid overlap of neighboring facilities.²

At the March 17th workshop, staff described that this change was intended to describe facility boundaries and would require GPS or similar data to identify the boundaries of large facilities. PacifiCorp appreciates the need to identify facility locations but cautions against requiring too detailed location data as such a requirement could be overly burdensome, particularly for existing renewable facilities that have already been certified by the Commission or for many

² March 3rd Notice, p. 2.

wind and solar farms that cover extensive areas, often in remote regions with terrain that may be difficult to access. It was not made clear at the workshop that there was a current problem of facilities having overlapping location coordinates, so PacifiCorp questions whether this revision is solving a problem that does not exist. One concern expressed by staff at the workshop was that certain facilities used substation locations as the facility location. This could result in multiple facilities using the same location, when in fact those facilities are located in separate locations. To avoid this issue, it would be simpler to prohibit facilities from using substations as the facility location rather than requiring each facility to provide specific facility boundaries. This would allow distinct geographic locations without overly burdening facility owners or representatives by requiring the provision of a detailed geographic perimeter for each facility.

For the reasons described above, the Commission should avoid implementing the new RPS Online System until that system has been thoroughly vetted. Additionally, the Commission should avoid imposing a burdensome requirement of identifying facility boundaries when simpler facility location descriptions can be provided. PacifiCorp looks forward to working with the Commission and its staff in further refining the RPS program and developing the next edition of the RPS Guidebook.

Respectfully submitted,



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