

DOCKETED

Docket Number:	16-RPS-01
Project Title:	Developing Guidelines for the 50 Percent Renewables Portfolio Standard
TN #:	212445
Document Title:	Shell Energy North America (US), L.P. Comments on Draft RPS Eligibility Guidebook
Description:	N/A
Filer:	System
Organization:	Shell Energy North America
Submitter Role:	Public
Submission Date:	7/25/2016 12:22:11 PM
Docketed Date:	7/25/2016

Comment Received From: John Leslie

Submitted On: 7/25/2016

Docket Number: 16-RPS-01

16-RPS-01 Shell Energy North America (US), L.P. Comments on Draft RPS Eligibility Guidebook

Additional submitted attachment is included below.

John W. Leslie
Partner

john.leslie@dentons.com
D +1 619 699 2536

Dentons US LLP
600 West Broadway
Suite 2600
San Diego, CA 92101
United States

大成 Salans FMC SNR Denton McKenna Long
dentons.com

July 25, 2016

Via E-Mail

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 16-RPS-01: Shell Energy Comments
on Draft RPS Eligibility Guidebook, Ninth Edition

To: Energy Commission:

In accordance with the schedule established in the “notice” that was issued on July 11, 2016 in the above-referenced proceeding, Shell Energy North America (US), L.P. (“Shell Energy”) provides its comments on the Commission Staff’s draft RPS Eligibility Guidebook, Ninth Edition (hereafter, “Draft Guidebook”). Shell Energy’s comments address the following issues:

1. Prior Period Adjustments: The Draft Guidebook includes a new provision that addresses identified discrepancies between actual generation and a WREGIS certificate for a generation month. The Draft Guidebook provides that when the WREGIS system makes a prior period adjustment to correct the WREGIS Certificate total, “LSEs should claim procurement to reflect the actual generation amounts of the facility, regardless of the vintage date(s) on the WREGIS Certificates.” Draft Guidebook at p. 70.

This proposed draft language wrongly assumes that the LSE is the generator, and/or that the LSE had knowledge of the adjustment. If there are any adjustments to a WREGIS certificate made by WREGIS, WREGIS should be responsible for informing the certificate holder -- which may or may not be the generator or the LSE. In this connection, WREGIS should develop a process for updating certificates to reflect PPAs.

2. RPS Online System: The Draft Guidebook includes a new section (Chapter 4) addressing an RPS Online System created by the Commission to “streamline the RPS certification application and reporting processes.” Draft Guidebook at p. 43. The Draft Guidebook provides that when the Ninth Edition of the Guidebook takes effect, all certification applications must be submitted in the RPS Online System. Id.

In general, Shell Energy supports the Commission's transition to the RPS Online System, and applauds the Commission's efforts in implementing this new system. However, the Commission should take the following steps to ensure that the transition is seamless and that the RPS Online System is functioning properly before the RPS Online System is the sole means by which to submit certification applications and perform other compliance functions.

First, because the Commission requires Retail Sellers to report facility-specific information, e.g., latitude and longitude of the facility, interconnection agreements, etc., the Commission must require the facility owner or operator to provide that information during the registration/certification process.

Second, the Commission should allow market participants to beta test the RPS On-Line System and solicit comments on the System prior to formal implementation.

Thank you for your consideration of these comments. If you have questions regarding the issues raised in these comments, please do not hesitate to contact the undersigned.

Best regards,

A handwritten signature in blue ink, appearing to read "John W. Leslie".

John W. Leslie
of
Dentons US LLP
on behalf of
Shell Energy North America (US), L.P.