

## DOCKETED

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**STATE OF CALIFORNIA**

**ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION**

In the matter of:

Developing Guidelines for the 50 Percent  
Renewables Portfolio Standard.

Docket No. 16-RPS-01

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

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RENEWABLES PORTFOLIO STANDARD ELIGIBILITY GUIDEBOOK**

PacifiCorp appreciates this opportunity to provide comments on the California Energy Commission’s (Commission’s) draft Ninth Edition of the Renewables Portfolio Standard Eligibility Guidebook (Draft RPS Guidebook). Generally, PacifiCorp supports the revisions to the Draft RPS Guidebook and commends the Commission and staff for their efforts in improving the Draft RPS Guidebook. However, PacifiCorp does have concerns with certain revisions and requests that the Draft RPS Guidebook be clarified and revised to most effectively describe applicable RPS requirements.

**I. Additional Details are Needed for the RPS Online System**

Although PacifiCorp has not been approached by, or engaged with, the Commission on development of the RPS Online System, PacifiCorp looks forward to the implementation of the RPS Online System and a more streamlined process for reporting and certification. While PacifiCorp supports the Commission’s effort to streamline and simplify RPS reporting through the use of the RPS Online System, PacifiCorp remains concerned that additional details of the RPS Online System and the RPS Online System Manual are needed to effectively transition to using the RPS Online System. For example, PacifiCorp notes that while the Draft RPS

Guidebook provides some indication of the functionality and details of the RPS Online System, many of these details are left to the RPS Online System Manual, which has not yet been made available. The Commission must ensure that the RPS Online System Manual provides sufficient detail and instructions, including definitions and clarifications of user roles, prior to implementation of the RPS Online System.

The RPS Online System Manual will include instructions on “completing and submitting the annual and compliance reports.”<sup>1</sup> PacifiCorp seeks clarification regarding the submission of Western Renewable Energy Generation Information System (WREGIS) reports via the RPS Online System. While many reports can be uploaded directly by retail sellers, WREGIS reports are generated by WREGIS and have historically been sent to the Commission by WREGIS, not by the retail seller. PacifiCorp requests that the RPS Online System Manual clarify how WREGIS reports be submitted to the Commission to ensure retail sellers can fully comply with any new requirements.

The Draft RPS Guidebook states that all RPS certification “applications will be completed and submitted through the RPS Online System.”<sup>2</sup> PacifiCorp seeks clarification regarding facilities that have already been certified as RPS-eligible. Given that amendments, withdrawals, and changes in facility ownership will be handled through the RPS Online System, facilities that have already been certified as RPS-eligible should be incorporated into and included in the RPS Online System. This will avoid duplicative work on the part of certification applicants.

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<sup>1</sup> Draft RPS Guidebook, p. 43. (Unless otherwise noted, all page references to the Draft RPS Guidebook are to the underline/strikeout version of the Draft RPS Guidebook.)

<sup>2</sup> Draft RPS Guidebook, p. 46.

With these changes, PacifiCorp believes the RPS Online System will effectively streamline and simplify RPS reporting and certification.

## **II. RPS Certification**

For the most part, PacifiCorp supports the revisions to the RPS Certification section of the Draft RPS Guidebook, but seeks clarification regarding certain requirements. When applying for RPS certification, applicants may submit “documentation created for other purposes ... provided that the applicant lists all submitted documents, summarizes the purpose of each document, identifies which requirement each document is being submitted to fulfill, and indicates where in each document the necessary information is contained.”<sup>3</sup> Given the implementation of the RPS Online System and the fact that applications and supplemental information will be submitted via the RPS Online System, PacifiCorp requests that the RPS Online System Manual include detailed instructions for the submission of such additional information.

## **III. Annual Load Serving Entity Reports**

For the most part, PacifiCorp supports the revisions to the Annual Load Serving Entity Reports section of the Draft RPS Guidebook, but seeks clarification regarding certain requirements. When submitting documentation “in addition to or in support of the required forms ... [t]he Energy Commission will accept documentation created for other purposes ... provided that the LSE lists all submitted documents, summarizes the purpose of each document, identifies which requirement each document fulfills, and indicates where in each document ... the necessary information is contained.”<sup>4</sup> Given the implementation of the RPS Online System and the fact that annual reports and supplemental information will be submitted via the RPS

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<sup>3</sup> Draft RPS Guidebook, p. 49.

<sup>4</sup> Draft RPS Guidebook, p. 67.

Online System, PacifiCorp requests that the RPS Online System Manual include detailed instructions for the submission of such additional information.

PacifiCorp is also concerned about provisions in Section 7.D of the Draft RPS Guidebook that restrict the ability of a Local Publicly Owned Electric Utility (POU) to utilize excess renewable procurement in future compliance periods. Section 7.D does allow POU's to withdraw surplus RECs from one compliance period, but those surplus RECs may only be applied to the "RPS compliance period immediately following the compliance period for which the RECs were surplus."<sup>5</sup> Nothing in statute or in the Enforcement Procedures for the RPS for POU's prohibits a POU from applying excess procurement from one compliance period to *any* subsequent compliance period, not just the immediately subsequent compliance period.<sup>6</sup> Accordingly, the Draft RPS Guidebook should be revised to allow POU's to apply excess procurement to any subsequent compliance period.

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<sup>5</sup> Draft RPS Guidebook, p. 74.

<sup>6</sup> Pub. Util. Code Section 399.30(d)(1) allows a POU to implement excess procurement requirements found in Pub. Util. Code Section 399.13(a)(4)(B), which provides that excess procurement may be "applied to *any* subsequent compliance period." (Emphasis added.) Similarly, Section 3206(a)(1)(A) of the Enforcement Procedures for the RPS for POU's allows a POU "to apply excess procurement in one compliance period to a subsequent compliance period."

#### IV. Conclusion

For the reasons described above, the Commission should revise the Draft RPS Guidebook to provide additional detail regarding the RPS Online System. Furthermore, the RPS Online System Manual must provide detailed instructions to ensure a smooth transition to the RPS Online System. Finally, excess procurement requirements must be revised to allow POUs to apply excess procurement to any subsequent compliance period, consistent with statute. PacifiCorp looks forward to working with the Commission and its staff in further refining the RPS program and finalizing the Ninth Edition of the RPS Guidebook.

Respectfully submitted,



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