

DOCKETED

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**BEFORE THE ENERGY COMMISSION
OF THE STATE OF CALIFORNIA**

In the matter of:

Developing Guidelines for the 50 Percent
Renewables Portfolio Standard (RPS)

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Docket No. 16-RPS-01

STAFF WORKSHOP
RE: Renewables Portfolio
Standard Online System

**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER (LADWP) TO THE
CALIFORNIA ENERGY COMMISSION (CEC) STAFF WORKSHOP ON RENEWABLES PORTFOLIO
STANDARD (RPS) ONLINE SYSTEM**

Dated: August 31, 2016

Louis C. Ting
Director of Power Planning & Development
Los Angeles Department of Water and Power
111 North Hope Street, Suite 921
Los Angeles, CA 90012
Telephone: (213) 367 – 0239
Email: Louis.Ting@ladwp.com

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INTRODUCTION

The City of Los Angeles (City of LA) is a municipal corporation and charter city organized under the provisions set forth in the California Constitution. LADWP is a proprietary department of the City of LA, pursuant to the Los Angeles City Charter, whose governing structure includes a mayor, a fifteen-member City Council, and a five-member Board of Water and Power Commissioners (Board). LADWP is the third largest electric utility in the state, one of five California Balancing Authorities, and the nation's largest municipal utility, serving a population of over four million people. LADWP is a vertically integrated utility, both owning and operating the majority of its generation, transmission and distribution systems. LADWP has annual sales exceeding 23 million megawatt-hours (MWhs) and has a service territory that covers 465 square miles in the City of LA and most of the Owens Valley. The transmission system serving the territory totals more than 3,600 miles and transports power from the Pacific Northwest, Utah, Wyoming, Arizona, Nevada, and California to Los Angeles. LADWP appreciates the opportunity to comment on the California Energy Commission (CEC) Staff Workshop regarding the Renewable Portfolio Standard (RPS) Online System.

GENERAL COMMENTS ON THE RPS ONLINE SYSTEM

LADWP appreciates CEC's efforts to implement a new RPS Online System to improve the RPS certification and verification processes. While the commenting period regarding the August 18, 2016 workshop is meant to provide stakeholders an opportunity to provide comments to CEC staff on the Account Management and RPS Certification portions, LADWP would first like to express general concern regarding the swift full implementation of the RPS Online Program.

LADWP respectfully requests that the CEC delay full implementation of the RPS Online reporting system. Adequate time should be given for stakeholder collaboration with CEC staff before such a significant change is made. There is no reason that the transition to a new online system should be rushed and the current schedule provided by the CEC is too aggressive. It is difficult for interested stakeholders to participate in the process with meaningful feedback when commenting and testing deadlines are set so narrowly. To date, CEC has only conducted three stakeholder workshops, two of which were limited to focus groups, to introduce users to a preliminary version of the RPS Online System. During each of these workshops, there have been many unavailable features because the system is still not fully developed. LADWP acknowledges the CEC staff efforts in improving the RPS Online system based on comments received for the February 23, 2016 workshop and the July 26, 2016 workshop. We appreciate the progress that has been made so far. However, the progress is still not enough to allow for mandatory implementation by October 2016.

There are still many outstanding issues that should be addressed before the CEC declares the online system mandatory. For instance, the current version of the RPS Online Training manual only has sections addressing the account management and certification portions. If the RPS Online program is viewed in portions such as account management, certification, email notifications, migration of existing data and verification/reporting, then to date, stakeholders have only had access to view and test 40-50% of the functionality of a program which will be fully implemented in one month. The ninth edition of the RPS Eligibility guidebook transfers all certification and reporting to the RPS Online system on or after October 1, 2016 even though approximately 50-60% of the program is not available to view/test. As an

example, stakeholders will not have sufficient time to input data for multi-fuel reporting due in April 2017 when the reports are currently not available for viewing/testing yet and organization information has not even been migrated or checked.

SPECIFIC COMMENTS ON THE RPS ONLINE SYSTEM

LADWP thanks the CEC for providing us access to the RPS Online system and giving us the opportunity to test the account management and application portion. As such, please see the following comments regarding program features and requirements available to us at this time, followed by some general questions and recommendation for CEC staffs consideration.

PROGRAM FEATURE IMPROVEMENTS

- When filling out an Address for a facility or any other location in the RPS Online Program, the zip code should automatically designate the city and state; currently any zip code or city can be entered in the application without validating that the city and zip codes are accurate.
- The administrative user should be informed when there are changes to applications being made or other users have been given access to the program

APPLICATION FOR AGGREGATE FACILITIES

- Requiring a facility boundary for aggregated units is burdensome and unnecessary, since the CEC already requires GPS coordinates. Aggregation exists to swiftly certify multiple facilities as a single unit, requiring a facility boundaries for each facility defeats the purpose of the aggregate distinction. Although, CEC's intent for this requirement is to ensure duplicate facilities are identified if they share the same address, facilities with the same address are not common and can be addressed on an individual basis instead of requiring all aggregated facilities to have facility boundaries identified. LADWP requests that the CEC remove the requirement for facility boundaries for aggregated units, since existing certified aggregates do not have a facility boundary and adding this

requirement will not ensure that the CEC has an accurate accounting of all aggregated facilities in California anyway.

- When completing an application for certification of an aggregated unit, after the aggregate unit facility boundary is entered and saved in the *Aggregated Units GIS and Location Information* page, the form should automatically take you to the Aggregated Facilities List page instead of requiring the user to click the go back button.
- When the application is on the *Aggregated Unit Summary* page, there is a button for save & next that doesn't take you to any other screen.

NOTIFICATIONS

- During the workshop, CEC Staff mentioned that notifications on application status will be sent to every user regardless of role. LADWP recommends that only the applicant and system administrator receive all notifications. Other roles such as Attestants do not need to be informed for every status and constant notifications for several applications would be bothersome for roles that are not involved every step of the way.

QUESTIONS

- Will Biomethane Attestant roles receive email notification regarding status of applications?
- When will the reporting forms become available?
- Will stakeholders have sufficient time to input data for multi-fuel reporting due in April 2017 when these features have not been available for testing yet?
- How will retroactive RECs be accounted for?
- How will time zones be accounted for in e-Tag reports?
- How will rolling surplus RECs from one compliance period (CP) into the next work?
- How will you be allowed to explain bucket categories?
- What will be the overall system hierarchy?
- What will be the report formats and data requirements?
- How will withdrawn surplus retired RECs be reconciled with CP reports?

RECOMMENDATION

Given existing questions regarding verification and reporting, LADWP recommends that the CEC take a phased approach for the RPS Online implementation. The CEC should delay the certification implementation to the beginning of Compliance Period 3 (CP3), January 2017 and delay full implementation for reporting to January 2018 in preparation for CP3 reporting that begins in April 2018. This phased approach would ensure that there is a natural transition to the RPS Online Program associated with existing compliance period dates that are familiar to Load Serving Entities (LSE). If CEC continues with its October 12, 2016 implementation date, LADWP fears that stakeholders will encounter issues similar to those experienced during the hurried transition from the ITS to WREGIS, which resulted in numerous RECs not being properly accounted for and issues with verification which are still being resolved. There is no need to rush this process since having a fully developed program ensures that unnecessary program deficiencies do not create an additional burden to CEC staff and hinder LSEs ability to meet their renewable goals. Granting a transitional period from now until January 2017, and 2018 respectively, for the RPS Online System implementation, ensures appropriate time for stakeholder feedback and training. Moreover, LADWP requests that stakeholders have the option to submit RPS applications and reports via email or the online system during this transition period. This will give CEC staff the opportunity to conduct more instructional workshops and discuss concerns with stakeholders before the online system is mandatory.

CONCLUSION

In closing, LADWP appreciates the opportunity to provide input into improving the RPS Online System implementation. California's 50% renewable goal is a nationwide model, so ensuring seamless implementation of this RPS Online Program should be a priority. LADWP is looking forward to a future where RPS compliance is a smooth experience, so we can meet California's renewable goals and help build a cleaner California.

Respectfully Submitted,



By: Louis C. Ting
Director of Power Planning & Development
Los Angeles Department of Water and Power
111 North Hope Street, Suite 921
Los Angeles, CA 90012
Telephone: (213) 367 – 0239
Email: Louis.Ting@ladwp.com

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