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Comment Received From: William Westerfield

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SMUD Comments Re: RPS Online System Workshop

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Additional submitted attachment is included below.

STATE OF CALIFORNIA

BEFORE THE CALIFORNIA ENERGY COMMISSION

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| In the matter of: |) | Docket No. 16-RPS-01 |
| |) | |
| Developing Guidelines for the 50 Percent Renewables Portfolio Standard |) | Comments On: <i>Online System</i> |
| |) | |
| |) | August 31, 2016 |
| |) | |

**Comments of the Sacramento Municipal Utility District
(SMUD) on the New Online System**

Thank you for the opportunity to provide comments on the new Online RPS application and reporting system. SMUD appreciates the CEC staff work on development of this system, and believes that it will be a marked improvement administratively over the current download and submit structure.

With regard to specific issues in the testing of the new online system, SMUD has the following comments:

General

- We understand that there must be a clean “transition” to the on-line system, where the old forms are no longer used, the system is “trued up”, and then only the on-line system is available. However, there should be some planning about what to do with users/stakeholders that have not “come up to speed” and attempt to use the old process. It will be disruptive to the RPS market if there is a significant amount of returned applications, hurried adjustment to the on-line system, and then duplicative work to get a facility certified. The CEC should want to avoid issues similar to the change to tracking generation in WREGIS, where deadlines had to be revised several times in order to keep the RPS process functioning adequately. At the very least, the CEC should prepare for months of additional customer support on the application process and some degree of flexibility on deadlines for those getting used to a new system.
- Having the ability for new users to create their own profile and then be added to an account by the primary administrator would be helpful, rather than requiring the primary administrator of a utility account to essentially create a profile for

each new user. Specifically, the Administrator should add the name, user name, phone number, email address, etc. of any new users that need to be added and then email the new user with their user name and temporary password so they can create the rest of their profile.

- There needs to be substantially more explanatory material available for users of the system, similar to that available for WREGIS. We understand that more instructions will be available for the “go live” version, but want to point out that the current documentation is not sufficient.

User Types and Authorities

- A user on an account that is simply signing off on an attestation appears to have full edit access to the entire application. This may be problematic, particularly if the attester is simply verifying a small portion of the application, like a pipeline path attestation.

Map & Mapping Screen

- When entering an address as part of certification, the mapping page comes up and the user is taken to the center of the zip code. You then have to reenter the address. While this may not be much of an issue for facilities with a single location, it will become cumbersome for an aggregate certification that could have 10, 20, 50, or more locations to add. The mapping screen should center on the address entered, if possible.
- While the Training Manual clearly states that you need to “right” click on the map to add a point or plot, the instructions in the Online System map page simply state that you need to click on the map to add. The instructions should be updated to clearly identify the need to “right” click on the map to avoid confusion and frustration by users.
- The current map in the Online System is outdated by at least 1 ½ to 2 years when zoomed out, and much older when you zoom in. Looking at a specific location where homes started being built more than 2 years ago, the zoomed out map only shows some streets but no homes; while the zoomed in map shows only open fields. As aggregated systems may be located in newer construction areas, there should be a method to establish the parameters if the map is outdated. It is very difficult to pinpoint locations and draw a boundary when all you can see is a big open field with no reference points.

Automatic emails from Online System

- The email sent to new users with their user name and password should also include a link back to the Online System's login page to simplify the process; especially for new users who are being added by someone else. Otherwise the new user has to also have a separate reference to the login page link, and some may not know where to go for this.
- The automated email notification of changes to application status includes an invalid link to the Online System's web address.
- Email notifications of a completed application and subsequent notifications of a status change are apparently sent to the one person on the test account that completed the application, rather than to all users on the account.

Aggregate Unit Application

- On the Aggregate Unit application, you are asked to enter both the facility address and owner address, even if it is the same. It would be more user friendly to be able to indicate that these are the same to avoid having to retype this information (as in a credit card purchase), especially if the application consists of a significant number of locations.
- The last page of the Aggregate Unit application before moving to certification includes a button at the top right corner that says "e-mail", but it is unclear exactly what that button is for. When it was selected, the system moved to a page that allowed the user to send an e-mail to himself that said it was an automated e-mail sent from the RPS Online System. This button does not appear to be included on this page for the other application types. It should be made clearer what the purpose of this button is, either on the page and/or within the User Manual.

Application Structure

- When selecting to Certify a Pre-Certified Facility, the option to select a facility to certify was not made available, but instead the system moved directly into the application to certify the pre-certified facility. The status of the application was automatically changed from "Approved" (as Pre-Certified) to "In Progress" (as Certified). The system should allow users the opportunity to select the Pre-Certification facility they want to certify, or to simply back out without having the status automatically changed to "In Progress" for converting to a certified facility.

- There do not appear to be sufficient fuel types in the Certification and Pre-Certification application structures, particularly for hydro. In addition to “Small Hydro”, there should be fuel types for the other kinds of eligible hydro facilities. This may be the only omission, but the pull down lists should be checked in general for issues like this.
- The application structure forms do not appear to allow entry of a historical “on-line” date, allowing only the current date and future dates. Many applications will involve a historical on-line date so this should be supported.

/s/

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