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

In the matter of:)	Docket No. 16-RPS-01
)	
Developing Guidelines for the 50 Percent Renewables Portfolio Standard (RPS))	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**

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

In the matter of:)	Docket No. 16-RPS-01
)	
Developing Guidelines for the 50 Percent)	STAFF WORKSHOP
Renewables Portfolio Standard (RPS))	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**

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 partake in the testing of the California Energy Commission (CEC) Renewable Portfolio Standard (RPS) Online System and provide comments on how to improve the tool for certification and verification before adoption.

COMMENTS ON THE RPS ONLINE SYSTEM

LADWP appreciates the effort of the CEC to implement an RPS Online System that is intended to improve the current reporting process that involves the use of Excel spreadsheets. As a result, LADWP's focus during the testing exercise was looking for opportunities to make the Online System more user-friendly and yet aligns with the provisions in the RPS Guidebook. In cases where the Online System performed below the standards of current reporting process, LADWP recommended measures to make the tool perform at par with the current reporting process. Below are specific recommendations organized per tab of the Online System.

I. Global Home tab

1. Home | TER tab

Provide the full name of TER—Time Extension Request—as there is no readily discernable way of knowing what the abbreviation stands for without resorting to the User Help Manual.

2. Home | Verification - CCP Report

A. *CCP Report (Common Carrier Pipeline Report) section has incomplete calculations and functionality that would prevent LADWP from receiving full REC credits*

The methodology used by the Online System for calculating biomethane RECs from facilities with multiple energy resources considers only one of the several methods proposed in the draft 9th Edition Guidebook (pages 25-27) or the current 8th Edition Guidebook (pages 31-34). The options in the guidebooks for measuring renewable generation are:

- a. Thermal Conversion and Fuel Cell Technologies:
 1. Direct Energy Resource Measurement
 2. Net Renewable Energy Resources Contribution

3. Direct Measurement of the Thermal Contribution
 - b. Direct Measurement of the Generation Out
 - c. Alternative Measurement Methods

The Online System addresses only option (a) (1)—The Thermal Conversion-Direct Energy Resource Measurement—which is applicable to either a generating facility as a whole or individual generating units within a facility. This method is the algebraic product of multiplying the generated energy (MWh) by the ratio of the biomethane MMBTU to the Total Gas MMBTU.

Method (a)(1) can only be applied to facilities or units that are made of simple cycle generators. The current configuration of the RPS Online System does not offer any of the other adopted CEC RPS guidebook methods to be used for claiming RECs through the CCP report. By not including availability of all 3 methods in the RPS Online System, LADWP would be prevented from receiving credit for the total amount of RECs generated by its combined cycle units. This lost credit would be close to 30%. CEC must modify the RPS system or allow for another reporting avenue to accommodate all CCP calculation methods to be accepted in the verification process as described in the CEC RPS Guidebook.

LADWP recommends the following be implemented as part of the Online Verification System:

- Ability to account for biomethane RECs attributable to the steam generating units in a combine cycle configuration
- Ability to account for the other methods in the Guidebook

B. CCP Report – Common Carrier Pipeline – Manual Entry of Pipeline Segment Information

The Online System is supposed to make reporting easier, however, the manual entry of the CCP Pipeline Segment data is cumbersome and prone to entry errors. In a

typical three (3) year compliance period reporting scenario, where a POU is to input details 3 biomethane contracts with fifteen (15) pipeline segments, a POU staff is likely to type more than 1,600 data points. LADWP recommends CEC to include the option of uploading the data points directly into Online System.

C. CCP Report – [Biomethane] supporting Documentation

Provide a column that list the file names of supporting documents uploaded into the system; currently, there is no identifier to distinguish between files uploaded into the system on this page.

3. Home | Verification – Annual Report Summary

Provide further explanation on what the statuses mean. The generic information does not shed any light on what is required to complete the reporting process.

4. Home | Verification – Navigation Pane

Provide a navigation pane for the “Verification” section just as is in the “Applications” section to help users monitor and track progress of their work. In order to navigate the Verification section, users have to surf through several pages to be able to land on particular one they are looking for; it creates an undue burden to preempt what is needed in the hierarchy of steps to accomplish a verification task.

5. Home | Applications – Certification Application Summary and Facility - Facility Summary

Provide the dimensional unit (KW or MW) for Nameplate Capacity on the “Certification Application Summary” and “Facility Summary.” It takes away the guess work in determining which units should be assigned to the nameplate capacity.

6. Home | Applications – Certification Application Summary - Email

- A. The Email functionality does not notify the CEC staff as intended, rather it ends up sending notifications to the POU staff. Another observation was that it defaulted to a primary recipient whose user profile had been deleted from the system.
- B. The Email Template page should include a drop down list of a POU Users' list for the CC field in order to make it easier to select who else should receive notification about the communication with the CEC staff.
- C. The subject line field of the "Email Template" should also include the name and RPS ID of the facility been discussed.
- D. The outgoing notification to the POU should include the content of the Notification field; this will provide further information about the request made about the facility in question to any recipient on the notification.

II. Global Verification Reports Tab

Change the default page resulting from clicking the "Verification Reports" tab to "Claims Eligibility Report" page instead of the "Upload Supporting Documentation-Biomethane" page in order to be consistent with the behavior of the other global tabs; unlike the rest of the global tabs that defaults to the first submenu item when clicked, Verification Reports tab defaults to a Biomethane Invoice Upload page which then creates an error page when a file is uploaded.

III. Global ACCT MGT Tab

1. ACCT MGT – Select Organization

Provide the global navigation tabs to the "Select Organization" page as selecting this option from the ACCT MGT tab provides no alternative to leave the page other than to select an organization.

2. ACCT MGT - Organization Information Detail

A. User Account Deletion:

The following expectations were not met during the testing of the “Organization Information Details,” and therefore need fixing to alleviate security concerns:

- i. When a user is deleted from the Users’ list, it is expected that he or she will not be able to use the Online System going forward, however, during the test, an individual whose profile was deleted while logged in to the system was still able to modify and apply changes to the data files in the system. This poses a security concern and needs an immediate fix.
- ii. Once a user is deleted from the system, it is expected that he/she will be notified that his/her account has been deactivated, that was not the case in deleting a user. A notification will help alert the user his/her account is not active anymore.

B. User List Table

Apply the following recommendations to the user list to make it easier to use the “Organization Information Detail” page:

- i. Increase the width of the First Name and Last Name to avoid wrap-around; it makes it easier to identify the names of the users.
- ii. Include User ID field on the list that corresponds to the first and last names.
- iii. Provide a search option to make it easier look for users by role, part of or full name or any combination.
- iv. Provide the ability to export the list into Excel or CSV file formats as provide on the Home-Applications page.

C. Activate/Deactivate a User Profile

Provide options for deactivation/activating a user instead of deleting the accounts entirely—this will make it easier to reinstate a user profile to avoid re-entering the same data over again.

CONCLUSION

In closing, LADWP appreciates the opportunity to provide input into improving the RPS Online System before adoption. California's 50% renewable goal is a nationwide model, so ensuring seamless implementation of this RPS Online Program should be a priority. LADWP looks forward to continue working with the CEC to help build a cleaner California.

Respectfully Submitted,



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