

DOCKETED

Docket Number:	16-RPS-01
Project Title:	Developing Guidelines for the 50 Percent Renewables Portfolio Standard
TN #:	214544
Document Title:	Comment on E-Tag and Hourly Reporting CEC 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**

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Dated: November 21, 2016

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OF THE STATE OF CALIFORNIA**

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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 E-TAG AND HOURLY REPORTING IN THE RPS ONLINE SYSTEM

1) E-Tag Report

- a) Status does not display

After uploading the e-tag data into this report, the status field did not update with the current progress or timestamp.

Summary		
Step	Status	Last Status Date
CCP Report	Gen Data In progress	11/2/2016 1:21:27 PM
WREGIS Report	In Progress	10/13/2016 4:14:45 PM
POU Contracts		
Annual Summary Report		
e-Tag Report		
Hourly Report	In Progress	11/17/2016 1:58:07 PM

2) Hourly Report

- a) RPS ID and WREGIS GU ID

Currently, the RPS ID and WREGIS GU ID have to be entered in, prior to submitting the data. If using the 'Upload POU hourly form' option, this information should be pulled from the excel file automatically.

POU Hourly Data Submission Type

Please fix the following errors:

- RPS ID is required.
- WREGIS GU ID is required.

Instructions

- Please select how you want to enter the POU Hourly data. To enter manually select 'Manual Line Entry'. To upload POU Hourly Report select 'Upload POU Hourly form'.

*RPS ID

*WREGIS GU ID

Select Submission Type

Upload POU hourly form

Previous

Save & Next

b) Incorrect Hour Displaying

The list view shows the correct hour, but once the user selects an e-Tag to view the "POU Hourly Details", the 'Hour Ending' defaults to 25. Also, editing it to show the correct hour does not save and continues to show the incorrect Hour Ending as 25.

	e-Tag ID	Hour Ending	Hourly Final Schedule(MWh)	Hourly Meter Data(MWh)	Preliminary Estimate of Eligible PCC1 Volume
Select	SPPC_LAWM01EB00001_LDWP 1	0.00	0.00	0.00	0.00
Select	SPPC_LAWM01EB00001_LDWP 2	0.00	0.00	0.00	0.00
Select	SPPC_LAWM01EB00001_LDWP 3	0.00	0.00	0.00	0.00
Select	SPPC_LAWM01EB00001_LDWP 4	0.00	0.00	0.00	0.00
Select	SPPC_LAWM01EB00001_LDWP 5	0.00	0.00	0.00	0.00
Select	SPPC_LAWM01EB00001_LDWP 6	0.00	0.00	0.00	0.00
Select	SPPC_LAWM01EB00001_LDWP 7	0.00	0.00	0.00	0.00
Select	SPPC_LAWM01EB00001_LDWP 8	0.00	0.00	0.00	0.00
Select	SPPC_LAWM01EB00001_LDWP 9	0.00	0.00	0.00	0.00
Select	SPPC_LAWM01EB00001_LDWP 10	0.00	0.00	0.00	0.00
Select	SPPC_LAWM01EB00001_LDWP 11	0.00	0.00	0.00	0.00
Select	SPPC_LAWM01EB00001_LDWP 12	0.00	0.00	0.00	0.00
Select	SPPC_LAWM01EB00001_LDWP 13	0.00	0.00	0.00	0.00
Select	SPPC_LAWM01EB00001_LDWP 14	0.00	0.00	0.00	0.00
Select	SPPC_LAWM01EB00001_LDWP 15	2.00	2.00	2.00	2.00

1 2 3 4 5 6 7 8 9 10 ...

Add Delete

POU Hourly Details

RPS ID 61938	WREGIS GU ID W3555
*Date 11/15/2013	*Hour Ending 25
*Hourly Final Schedule 2	*e-Tag ID SPPC_LAWM01EB00001_LDWP
*Hourly Meter Data 2	*Percent Share Final Schedule(%) 1
*Percent Share of Facility Generation Output (%) 1	Preliminary Estimate of Eligible PCC1 Volume(MWh) 0.02

c) Incorrect Percentage and Eligible RECs

The “Percent Share Final Schedule (%)” shows 1, as opposed to 100. This is causing the “Preliminary Estimate of Eligible PCC1 Volume (MWh)” amount to be incorrect by a factor of 100.

POU Hourly Details

RPS ID 61938	WREGIS GU ID W3555
*Date 11/15/2013	*Hour Ending 25
*Hourly Final Schedule 2	*e-Tag ID SPPC_LAWM01EB00001_LDWP
*Hourly Meter Data 2	*Percent Share Final Schedule(%) 1
*Percent Share of Facility Generation Output (%) 1	Preliminary Estimate of Eligible PCC1 Volume(MWh) 0.02

3) Additional Comments

a) Attestation

- E-Tag Report – Currently, attesting to the uploaded data does not lock the report. Edits can still be made and saved after submitting an attestation. Should this be the case? This process is acceptable if a log is kept to track changes after an attestation is submitted.
- Hourly Report – Currently, unlike the current e-Tag Report functionality, attesting to the uploaded data locks the report and does not allow additional edits to be made. If modifications are required, an e-mail must be sent to the CEC staff to unlock the data.

It would be more efficient to include a button on the page to notify the staff requesting them to unlock it. This could be followed by a time-stamped submittal process to modify the data which has already been attested to. The CEC staff can then be notified and provided the option to review and approve it.

b) Searching Defaults

If the user uses the search function, then goes to the previous page and back to the report (either e-tag or hourly), the search is still saved. The only way to view the full amount of data uploaded is to press the search button again with a blank field.

c) Sortable Data or Ability to Download It

After uploading the information, it would be beneficial to be able to sort through the data. Currently, this is difficult to do by using just the RPS ID and/or the e-Tag ID search fields; there should be options on the columns to sort and filter the data. Also, including an option to export the data back into excel would be helpful to verify the submissions.

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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