October 3, 2014

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512
Via e-mail at: docket@energy.state.ca.us
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RE: Docket 11-RPS-01 RPS Implementation
Comments of the City and County of San Francisco On the Proposal
to Allow the Creation of Retroactive Renewable Energy Certificates
and Extend the Deadline for Use of the Interim Tracking System for
the Renewables Portfolio Standard (RPS)

The City and County of San Francisco, through its Public Utilities
Commission (SFPUC), supports the California Energy Commission's
proposal to extend the time-period that electric utilities can use their Interim
Tracking System (ITS) to record renewable energy generation and/or
retroactively certify this generation through WREGIS.

As noted at the January 28th workshop on this issue, current WREGIS
functionality does not allow for utilities to retroactively record RECs in
WREGIS more than 90 days prior to the generating unit's registration.
This makes it difficult, if not impossible for utilities to record RECs for
units that are retroactively eligible under RPS rules. This includes
RPS facilities such as AB920 distributed generation and SBX1-2 water
conveyance facilities. Allowing for these resources to be included
retroactively in WREGIS is one solution to address this problem. An
alternative approach, also proposed by the CEC, is to extend the time­
period that utilities may use the ITS to track and record their renewable
energy generation. Either approach should give the utilities the
flexibility they need to ensure RECs that should be RPS eligible are
appropriately accounted for.

Sincerely,

/s/ Michael Hyams                /s/ James Hendry
Michael Hyams,
Acting Manager
Regulatory and Legislative Affairs
Power Enterprise

cc: Barbara Hale, Assistant General Manager, Power
Theresa Cho, Deputy City Attorney

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