

**DOCKETED**

<b>Docket Number:</b>	18-IRP-01
<b>Project Title:</b>	Integrated Resource Plan
<b>TN #:</b>	223704
<b>Document Title:</b>	Comments of Roseville Electric Utility on Publicly Owned Utility Integrated Resource Plan Submission and Review Guidelines
<b>Description:</b>	This document was also docketed in Docket No. 17-IEPR-07
<b>Filer:</b>	System
<b>Organization:</b>	Roseville Electric
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	6/6/2018 10:25:34 AM
<b>Docketed Date:</b>	6/6/2018

*Comment Received From: Harinder Kaur*  
*Submitted On: 6/6/2018*  
*Docket Number: 18-IRP-01*

**ON PUBLICLY OWNED UTILITY INTEGRATED RESOURCE PLAN  
SUBMISSION AND REVIEW GUIDELINES**

*Additional submitted attachment is included below.*

<b>DOCKETED</b>	
<b>Docket Number:</b>	17-IEPR-07
<b>Project Title:</b>	Integrated Resource Planning
<b>TN #:</b>	223688
<b>Document Title:</b>	COMMENTS OF ROSEVILLE ELECTRIC UTILITY ON PUBLICLY OWNED UTILITY INTEGRATED RESOURCE PLAN SUBMISSION AND REVIEW GUIDELINES
<b>Description:</b>	N/A
<b>Filer:</b>	David Siao
<b>Organization:</b>	Roseville Electric
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	6/5/2018 3:28:05 PM
<b>Docketed Date:</b>	6/5/2018



**Roseville Electric**  
2090 Hilltop Circle  
Roseville, California 95747-9704  
*Reliable Energy. Dependable Service.*

## BEFORE THE CALIFORNIA ENERGY COMMISSION

**In the matter of,**

**2017 Integrated Energy Policy Report  
(2017 IEPR)**

**Docket No. 17-IEPR-07**

---

### COMMENTS OF ROSEVILLE ELECTRIC UTILITY ON PUBLICLY OWNED UTILITY INTEGRATED RESOURCE PLAN SUBMISSION AND REVIEW GUIDELINES

#### I. INTRODUCTION

Roseville Electric appreciates the opportunity to provide comments on the Second Edition of *the Publicly Owned Utility Integrated Resource Plan Submission and Review Guidelines* (“Guidelines”) issued on April 18, 2018 and updated on May 15, 2018. Roseville Electric is also appreciative of the workshop held on May 8, 2018 by Commission staff to explain the changes incorporating Senate Bill (SB) 338, and Commission staff’s willingness to work with stakeholders to improve the guidelines. In that spirit, Roseville Electric offers the following comments and suggestions to improve the guidelines.

#### II. COMMENTS ON THE GUIDELINES

##### A. Preferred resources should be defined in the Guidelines

On page 1 of the Guidelines, Commission staff has added the phrase “preferred resources” in reference to SB 338. This phrase is defined in neither SB 338 nor the Guidelines. Roseville Electric suggests defining “preferred resources” as, or replacing it with, the phrase “existing renewable generation, grid operational efficiencies, energy storage, and distributed energy resources, including energy efficiency,” as this appears to be the relevant statutory language added by SB 338 to Public Utilities Code 454.52(a)(3) and referenced by the Guidelines. Making this change would eliminate any

potential ambiguity and streamline the process for Publicly Owned Utilities (POUs) to conform their Integrated Resource Plans (IRP) to the applicable regulations and associated Guidelines.

### **B. Suggestions for the RPT**

Line 9 of the RPT should be eliminated. Current and future rules make it impossible for POUs to have “Excess balance/historic carryover” for Category 3 RECs, so this line will never be used. Similarly, the words “Carryover and” should be eliminated from Line 11, and Line 12 should be eliminated. Line 10 is redundant and may be eliminated or merged with Line 11.

Similarly, Roseville Electric recommends Commission staff consider separating out Category 2 RECs from Category 1 and Category 0 RECs in Lines 5-8. Post-2020 REC banking rules (see PU Code 399.13(a)(4)(B)) will prevent Category 2 RECs generated after 2020 from being categorized as “Excess balance/historic carryover.”

For Line 2 of the RPT, Roseville Electric recommends adding “self-generation,” as described in Title 20, Division 2, Chapter 13, 3201 (bb). For the purpose of RPS reporting, retail sales does not include self-generation, or “energy consumption by a POU, electricity used by a POU for water pumping, or electricity produced for onsite consumption.” Allowing POUs which exercise the option to subtract self-generation in Line 2 would be the most elegant solution for accurately calculating a POU’s RPS obligation, while preserving the “managed retail sales” number transferred from Line 14 of the Energy Balance Table (EBT) to Line 1 of the RPT.

### **C. Clarification of “every 5 years” requirement**

In Chapter 3, page 14, the Guidelines state: “On or before January 1, 2019, the governing board of a Filing POU is required to adopt an IRP and a process for updating the plan at least every five years.” It may be helpful to clarify whether the “every five years” refers to the January 1, 2019 deadline or the governing board’s adoption date. Roseville Electric recommends referencing the January 1, 2019 deadline, as this consistency will minimize the administrative burden of tracking 16 different adoption dates for the CEC.

## **III. CONCLUSION**

Roseville Electric appreciates the opportunity to provide these comments to the Commission, and looks forward to continuing to work with Commission staff on improving the Guidelines.

Dated June 5, 2018

Respectfully submitted,

David Siao

Energy Resources Analyst

Roseville Electric