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2023 CNE Power Source Disclosure Program Engagement

September 28, 2023

Constellation Audit Services

Executive Summary & Results

Constellation Audit Services (CAS) performed a review of the completeness and accuracy of the data submitted on the Constellation NewEnergy (CNE) Power Source Disclosure Program (PSDP) Annual Report for the year ended December 31, 2022. Schedules 1 & 2 of the PSDP Annual Report include details of specified and unspecified sources of power purchases and resales, as well as unbundled renewable energy credits (RECs) retired for the calendar year. Schedule 3 of the PSDP Annual Report uses the calendar year retail sales and a standard greenhouse gas emissions factor to calculate the power mix supplied to California-based customers, known as the Power Content Label.

CAS' review was conducted in accordance with California Energy Commission (CEC) requirements outlined in Title 20, Division 2, Chapter 3, Article 5, § 1394.2 – “Auditing and Verification” of the California Code of Regulations. The results of the audit procedures documented in this report are submitted to the CEC by Constellation Legal before October 1, 2023. Additionally, the Power Content Label, shown in Schedule 3, is distributed to all California-based customers before October 31, 2023. As of the date of this report, the Power Content Label has been distributed and a proof of service has been received.

CAS conducted this audit in accordance with the American Institute of Certified Public Accountants (AICPA) Statements on Auditing Standards.

The results of the audit indicate that the CNE PSDP Annual Report for the year ended December 31, 2022, is **Compliant** with the PSDP reporting requirements, as defined in the scope of this report. No exceptions were identified.

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Background

The PSDP was established in 1997 through the enactment of California Senate Bill 1305 in an effort to provide accuracy, reliability, and transparency on the sources of energy that are used to provide electric services to California consumers. The PSDP requires that electricity retail suppliers disclose which types of resources are used to generate electricity being sold to consumers. The suppliers are required to use a format developed by the CEC, titled the Power Content Label. Additionally, retail suppliers are required to complete an Annual Report template detailing their resource mix to the CEC.

CNE utilizes the Western Energy Coordinating Council's Western Renewable Energy Generation Information System (WREGIS), which is an independent, renewable energy generation registry and tracking system for the region covered by the Western Interconnection, as the source to report on the calendar year's purchases and retirements of unbundled RECs. In addition, the California Independent Service Operator's Market Results Interface System (MRI-S) is used to report the calendar year's total retail sales.

Areas In Scope

The scope of our review aligns with the requirements within Title 20, Division 2, Chapter 3, Article 5, § 1394.2 – “Auditing & Verification” of the California Code of Regulations:

- Reconciliation of specified purchases and resales by facility name, facility numbers (EIA, WREGIS and CEC-Renewable Portfolio Standard (RPS) IDs), kilowatt hours (KWhs), and fuel type for all specific purchases from source documents (i.e.- WREGIS Retirement Report and/or CEC Facility Listing) to the Annual Report.
- Reconciliation of unspecified sources of power, unbundled RECs, and resales from source documents to the Annual Report.
- Reconciliation of the total retail sales per MRI-S to total retail sales reported on the Annual Report.
- A sample of purchase transactions was selected from the WREGIS Retirement Report, and the following procedures were performed for each selection:
 - Reconciliation of the facility names, facility numbers (EIA, WREGIS and CEC- RPS IDs), KWhs, and fuel types from the invoice and/or contractual agreement to the WREGIS Retirement Report and CEC Facility Listing used to prepare Schedule 1.
 - For facilities owned by the retail supplier, agree the KWhs with meter reading made by an independent third party or confirm that the retail supplier has another internal procedure that assures facility production agrees to production claims. This procedure was not applicable as CNE does not own any generation facilities in the California territory.
 - Reconciliation of the date of generation from the invoice and/or contractual agreement to WREGIS Retirement Report used to prepare Schedule 1.
 - Verification that unbundled RECs reported on Schedule 2 were retired within the reporting year by validating the transaction/retirement date in the WREGIS Retirement Report.
- Reconciliation of the information presented in Schedule 3 of the Annual Report to the Power Content Label provided to California-based customers.
- Validation that the excluded emissions meet the requirements pursuant to section 1393(d).
- Verification of mathematical accuracy of the Annual Report.