

DOCKETED

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RPS-2024-01 RPS ONLINE one to many relationships and referential integrity issues

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The RPS ONLINE system appears to have issues with one to many relationships and referential integrity. The system falls short by not returning WREGIS GU ID in query results, making these issues difficult to detect. Below are examples that identify there are data security issues in the RPS accounting system.

Please ensure the RPS ONLINE system returns all search criteria in the results. Do so by adding WREGIS GU ID and any other data field not currently shown in the query results.

Steve Uhler
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Additional submitted attachment is included below.

RPS-2024-01 RPS ONLINE one to many relationships and referential integrity issues

The RPS ONLINE system appears to have issues with one to many relationships and referential integrity. The system falls short by not returning WREGIS GU ID in query results, making these issues difficult to detect. Below are examples that identify there are data security issues in the RPS accounting system.

Here we find a single WREGIS GU ID 4099 returns two different RPS ID, 61363 AND 64315 in the screen capture JPEG below.

Transfer: The applicant for the facility has transferred the application or the applicant has requested an update to the RPS certification of the facility.
Incomplete: The application has been deemed incomplete. The facility is ineligible for the RPS unless the applicant reapplies and the facility is approved.
Decommissioned: The facility has ceased to operate, as confirmed by the applicant or the Energy Commission.

Please Note:
The Energy Commission's RPS certification of a facility means the facility can produce electrical generation that may be used by a retail seller or POU to satisfy its RPS procurement requirements. Generation from certified facilities that is produced in the month of the eligibility date or later and tracked in WREGIS, may be used to meet RPS obligations, subject to all applicable procurement restrictions. Generation by facilities shown as "Utility Certification" in the Certification Type column are only eligible to meet the RPS obligations of the retail seller that certified the facility.

RPS ID: Suffix: Facility Name: Application Status: Resource Type: WREGIS GU ID:

Results Export To:

RPS ID	Suffix	Facility Name	Eligibility Date	Status	Primary Resource
61363	A	Solar Star California XIX, LLC	01/14/2011	Approved	Photovoltaic
64315	A	Chaparral Solar, LLC.	10/15/2019	Approved	Photovoltaic

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Here we find a single WREGIS GU ID W4099 does not return RPS ID 64315 result in the screen capture JPEG below as in the above in the screen capture JPEG.

depending on the circumstances of disapproval.

Withdrawn: The applicant for the facility has withdrawn the application or the applicant has requested an end to the RPS certification of the facility.

Incomplete: The application has been deemed incomplete. The facility is ineligible for the RPS unless the applicant reapplies and the facility is approved.

Decommissioned: The facility has ceased to operate, as confirmed by the applicant or the Energy Commission.

Please Note:

The Energy Commission's RPS certification of a facility means the facility can produce electrical generation that may be used by a retail seller or POU to satisfy its RPS procurement requirements. Generation from certified facilities that is produced in the month of the eligibility date or later and tracked in WREGIS, may be used to meet RPS obligations, subject to all applicable procurement restrictions. Generation by facilities shown as "Utility Certification" in the Certification Type column are only eligible to meet the RPS obligations of the retail seller that certified the facility.

RPS ID Suffix Facility Name Application Status Resource Type WREGIS GU ID

Search

Results

Export To:

RPS ID	Suffix	Facility Name	Eligibility Date	Status	Primary Resource
61363	A	Solar Star California XIX, LLC	01/14/2011	Approved	Photovoltaic

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Here we find WREGIS GU ID 3621 returns RPS ID 60894 in the screen capture JPEG below.

Disapproved: The facility is not eligible for California's RPS. If the facility had been previously certified, generation before disapproval may be eligible for the RPS depending on the circumstances of disapproval.

Withdrawn: The applicant for the facility has withdrawn the application or the applicant has requested an end to the RPS certification of the facility.

Incomplete: The application has been deemed incomplete. The facility is ineligible for the RPS unless the applicant reapplies and the facility is approved.

Decommissioned: The facility has ceased to operate, as confirmed by the applicant or the Energy Commission.

Please Note:

The Energy Commission's RPS certification of a facility means the facility can produce electrical generation that may be used by a retail seller or POU to satisfy its RPS procurement requirements. Generation from certified facilities that is produced in the month of the eligibility date or later and tracked in WREGIS, may be used to meet RPS obligations, subject to all applicable procurement restrictions. Generation by facilities shown as "Utility Certification" in the Certification Type column are only eligible to meet the RPS obligations of the retail seller that certified the facility.

RPS ID	Suffix	Facility Name	Application Status	Resource Type	WREGIS GU ID
<input type="text"/>	Please Select ▾	<input type="text"/>	Please Select ▾	Please Select ▾	3621

Search

Results

Export To:

RPS ID	Suffix	Facility Name	Eligibility Date	Status	Primary Resource
60894	A	Agua Caliente Solar	10/15/2009	Approved	Photovoltaic

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Find in page



Highlight All

Match Case

Match Diacritics

Whole Words



Here we find RPS ID 60894 in the screen capture JPEG below as in the results above screen capture JPEG, provides no indication of a one to many relationships with WREGIS GU ID 2576, 2668, 2782, 2812, 2838, 2844, 2925, 3240, 3621, 3829, 3953.

Please ensure RPS ONLINE system return all one to many relationships.

depending on the circumstances of disapproval.

Withdrawn: The applicant for the facility has withdrawn the application or the applicant has requested an end to the RPS certification of the facility.

Incomplete: The application has been deemed incomplete. The facility is ineligible for the RPS unless the applicant reapplies and the facility is approved.

Decommissioned: The facility has ceased to operate, as confirmed by the applicant or the Energy Commission.

Please Note:

The Energy Commission's RPS certification of a facility means the facility can produce electrical generation that may be used by a retail seller or POU to satisfy its RPS procurement requirements. Generation from certified facilities that is produced in the month of the eligibility date or later and tracked in WREGIS, may be used to meet RPS obligations, subject to all applicable procurement restrictions. Generation by facilities shown as "Utility Certification" in the Certification Type column are only eligible to meet the RPS obligations of the retail seller that certified the facility.

RPS ID	Suffix	Facility Name	Application Status	Resource Type	WREGIS GU ID
60894	Please Select ▾		Please Select ▾	Please Select ▾	

Search

Results

Export To: [Excel](#) [CSV](#)

RPS ID	Suffix	Facility Name	Eligibility Date	Status	Primary Resource
60894	A	Agua Caliente Solar	10/15/2009	Approved	Photovoltaic

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Here we find WREGIS GU ID 2668 returns RPS ID 60894 and 64917 in the screen capture JPEG below.

Incomplete: The application has been deemed incomplete. The facility is ineligible for the RPS unless the applicant reapplies and the facility is approved.
Decommissioned: The facility has ceased to operate, as confirmed by the applicant or the Energy Commission.

Please Note:

The Energy Commission's RPS certification of a facility means the facility can produce electrical generation that may be used by a retail seller or POU to satisfy its RPS procurement requirements. Generation from certified facilities that is produced in the month of the eligibility date or later and tracked in WREGIS, may be used to meet RPS obligations, subject to all applicable procurement restrictions. Generation by facilities shown as "Utility Certification" in the Certification Type column are only eligible to meet the RPS obligations of the retail seller that certified the facility.

RPS ID Suffix Facility Name Application Status Resource Type WREGIS GU ID

Search

Results

Export To:

RPS ID	Suffix	Facility Name	Eligibility Date	Status	Primary Resource
60894	A	Agua Caliente Solar	10/15/2009	Approved	Photovoltaic
64917	A	RE Slate 1 LLC - Stanford Phase	05/06/2021	Approved	Photovoltaic

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Here we find WREGIS GU ID 3953 returns RPS ID 60894 and 65241 in the screen capture JPEG below.

Incomplete: The application has been deemed incomplete. The facility is ineligible for the RPS unless the applicant reapplies and the facility is approved.
Decommissioned: The facility has ceased to operate, as confirmed by the applicant or the Energy Commission.

Please Note:
The Energy Commission's RPS certification of a facility means the facility can produce electrical generation that may be used by a retail seller or POU to satisfy its RPS procurement requirements. Generation from certified facilities that is produced in the month of the eligibility date or later and tracked in WREGIS, may be used to meet RPS obligations, subject to all applicable procurement restrictions. Generation by facilities shown as "Utility Certification" in the Certification Type column are only eligible to meet the RPS obligations of the retail seller that certified the facility.

RPS ID Suffix Facility Name Application Status Resource Type WREGIS GU ID

Search

Results Export To:

RPS ID	Suffix	Facility Name	Eligibility Date	Status	Primary Resource
60894	A	Agua Caliente Solar	10/15/2009	Approved	Photovoltaic
65241	A	K-01 Center Del Mar	07/03/2023	Approved	Photovoltaic

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In the attached email I identify gaps in RPS ID numeric values. Somehow a relationship to WREGIS certificates was made during the 2017-2020 compliance period, even though some RPS ID values were missing in the RPS ONLINE system. The RPS accounting system lacks referential integrity, therefore lacks data security.

Please ensure the RPS ONLINE system returns all search criteria in the results. Do so by adding WREGIS GU ID and any other data field not currently shown in the query results.

Steve Uhler
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