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VIA ELECTRONIC MAIL

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Re: Docket No. 21-RPS-02 Comments on Proposed Scope of the Draft RPS Guidebook 10th Edition

On October 18, 2024, California Energy Commission ("Energy Commission") staff distributed a notice requesting comments on the proposed scope of the draft Renewables Portfolio Standard ("RPS") Guidebook, 10th Edition ("RPS Guidebook"). Southern California Edison Company ("SCE") supports the scope of the RPS Guidebook with two additions and appreciates the opportunity to contribute to the Energy Commission's collaborative process for refining the scope RPS Guidebook through these written comments.

SCE addresses the following topics below, which should be considered as part of the scope of the RPS Guidebook:

- The proposed scope of the RPS Guidebook should include requiring the availability of an efficient and reliable Western Renewable Energy Generation Information System ("WREGIS") system, continuing improvements to the current WREGIS software system, and more robust testing of changes to the WREGIS software or introduction of new WREGIS software or features prior to rollout.
- The RPS Guidebook should not unfairly penalize hybrid facilities (renewables paired with storage) compared to standalone renewable facilities due to decreased Renewable Energy Credit ("REC") generation which has a material impact on their financial feasibility.

A. WREGIS Operating Rules

The participants in California's RPS program operate according to the RPS Guidebook to manage their REC related activities (e.g., Energy Commission, California Public Utilities Commission ("CPUC"), WREGIS administration, market participants purchases and sales of RECs, generators, and WREGIS accountholders creating and transferring RECs, Load Serving Entities retiring RECs to demonstrate RPS compliance). The RPS Guidebook requires an RPS participant to use the WREGIS system (RPS 9th Edition Guidebook, Chapter 3, A., 1. WREGIS). Over the last

two years, WREGIS has not operated reliably and efficiently. WREGIS had a reliable system up until the new WREGIS software system was implemented in 2022. Below is a list of functionality issues SCE, as WREGIS account holder, has encountered with the current WREGIS software system:

- REC Creation (WREGIS has put the most effort into fixing this issue over the last two years. It has mostly been fixed but still small issues remain.)
    - Over creating
    - Under creating
    - Not creating at all
- REC Transfer
    - Occasional random failure on mass transfer uploads (no error message but no transfers executed, partial set of records transferred)
    - Mass transfer upload separating each record into individual transfers
- E-Tag Matching
    - Occasional random failure on e-tag matching uploads
- Report Filters
    - Incorrect result with certain filter selections
    - Certain filter selections lead to error messages
- API (Application Programming Interface) – not functional yet
- Major changes to core software (i.e., WREGIS software system for REC tracking) must be fully tested before rollout in future

As such, the proposed scope of the RPS Guidebook should include review of requiring availability of an efficient and reliable WREGIS software system. The proposed scope should also include continuing improvements to the current WREGIS software system. Additionally, the proposed scope of the RPS Guidebook should include consideration of a requirement for more robust testing prior to rollout in production environment of: (1) changes to the WREGIS software system, or (2) introduction of new WREGIS software or features.

B. Treatment of On-Site Energy Storage

Language in the Ninth RPS Eligibility Guidebook requires that RECs for *hybrid* facilities (renewable paired with energy storage) will be reduced by any efficiency losses from charging/discharging from energy storage. This position does not align with the State's renewable goals and is inconsistent with how standalone renewable resources are treated elsewhere on the grid. Hybrid facilities should not be unfairly penalized compared to standalone renewable facilities due to decreased REC generation which has a material impact on their financial feasibility.

SCE proposes that the Energy Commission consider revising the RPS Guidebook to make no difference in how hybrids are treated since the state's substantial renewable and intermittent generation from stand-alone facilities will also be managed by stand-alone storage. This would require modifying the RPS Guidebook to measure energy production and associated RECs at a point between the renewable generator and the energy storage device. The Energy Commission should consider adding new diagrams and energy measurement methods in Chapter 3 Section F. Energy Storage to include co-located configurations.

Sincerely,

/s/ Adam Smith
Adam Smith