

DOCKETED

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Project Title:	Renewables Portfolio Standard
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Document Title:	Memo from Deputy Director Korosec to Executive Director Oglesby regarding extension request for Imperial Valley
Description:	Memorandum from Deputy Director Suzanne Korosec to Executive Director Robert Oglesby regarding retroactive REC request for Southern Power Co., SG2 - Imperial Valley , after submitted audit report was received and reviewed, recommending Executive Director Oglesby accept the audit report and forward the report to WREGIS.
Filer:	Judi Carter
Organization:	California Energy Commission
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Memorandum

To: Rob Oglesby

Date : February 23, 2016

Telephone: CALNET (XXX)
(XXX)

From : **California Energy Commission - Suzanne Korosec**
1516 Ninth Street Deputy Director, Renewable Energy Division
Sacramento CA 95814-5512

Subject: SG2 IMPERIAL VALLEY LLC'S AUDIT REPORT FOR THE CREATION OF RETROACTIVE RENEWABLE ENERGY CREDITS IN WREGIS FOR RPS CERTIFICATION

This memo is in regard to SG2 Imperial Valley LLC's audit report for the creation of retroactive renewable energy credits (RECs) in the Western Renewable Energy Generation Information System (WREGIS) for Renewables Portfolio Standard (RPS) certification for the following facilities:

Arkansas, RPS ID No. 61844A, WREGIS GU ID W4480
Sonora, RPS ID No. 61645A, WREGIS GU ID W4481
Alhambra, RPS ID No. 61646A, WREGIS GU ID W4479

RPS staff recommends that the Executive Director accept the audit report and forward the report to WREGIS based on the documentation SG2 Imperial Valley LLC submitted in the report as described below.

Audit Report for the SG2 Imperial Valley LLC Facilities

The audit report was prepared by an independent accountant or certified internal auditor in accordance with standards of the American Institute of Certified Public Accountants. Deloitte & Touche LLP performed the audit and included the findings, which confirmed that the RECs in question were not sold, traded, or otherwise transferred to any other individual or entity or used to satisfy another program.

Deloitte & Touche LLP determined that the RECs could qualify for the following states' programs: Arizona, Colorado, Michigan, Minnesota, Missouri, Montana, Nevada, New Mexico, North Carolina, North Dakota, Oregon, South Dakota, Utah, and Washington. Deloitte & Touche LLP received a letter from the administrator of each regulatory program or tracking system used by each state and confirmed that the RECs were not used to satisfy the program requirements for that state.

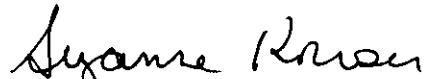
Additionally, it was confirmed that RECs could qualify under the following tracking systems: Western Renewable Energy Generation Information System (WREGIS), Midwest Renewable Energy Tracking System (M-RETS), Michigan Renewable Energy Certification System (MIRECS), and Green-e. A letter from the administrator of the tracking system used was received and confirmed the RECs were not used to satisfy the program requirements for that state.

Staff's Determination and Recommendation

Based on the supporting information provided by SG2 Imperial Valley, staff determined that SG2 Imperial Valley satisfied the requirements for the audit report. Therefore, staff recommends that the Executive Director accept the audit report for the creation of retroactive RECs in WREGIS for the Sonora, Alhambra, and Arkansas facilities for the vintage months/years of March 2014 through November 2014.

If the Executive Director accepts SG2 Imperial Valley's audit report, staff will forward the audit report to WREGIS staff for their consideration and approval. The Energy Commission will request WREGIS create the retroactive RECs consistent with the WREGIS Operating Rules Section 12.9 and invoice SG2 Imperial Valley for all costs and expenses incurred by WREGIS.

If you have any questions, please do not hesitate to contact me.



SUZANNE KOROSEC
Deputy Director, Renewable Energy Division

cc: Christina Crume
Gabe Herrera