DOCKETED	
Docket Number:	16-RPS-01
Project Title:	Developing Guidelines for the 50 Percent Renewables Portfolio Standard
TN #:	213399
Document Title:	PacifiCorp's Comments on the Renewables Portfolio Standard Online System
Description:	N/A
Filer:	System
Organization:	PacifiCorp/Pooja Kishore
Submitter Role:	Public
Submission Date:	8/31/2016 4:31:49 PM
Docketed Date:	8/31/2016

Comment Received From: Pooja Kishore

Submitted On: 8/31/2016 Docket Number: 16-RPS-01

PacifiCorp's Comments on the Renewables Portfolio Standard Online System

Additional submitted attachment is included below.

STATE OF CALIFORNIA

ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION

In the matter of:

Docket No. 16-RPS-01

Developing Guidelines for the 50 Percent Renewables Portfolio Standard Filed August 31, 2016

PacifiCorp's Comments on the Renewables Portfolio Standard Online System PacifiCorp appreciates the opportunity to provide comments on the California Energy Commission's (CEC) Renewables Portfolio Standard Online System Staff Workshop held on August 18, 2016.

Account Management

- In the Training Manual, please define and provide an explanation of the various roles and access/permission levels within an organization's account for the currently-proposed account users.
- We assume proposed use of the descriptor "External" as in "External System Admin" means external to the CEC but suggest that it is confusing to account users who would generally interpret that to mean external to the account/organization. We suggest alternate language, e.g. Account Holder System Admin.
- We suggest clarifying that the individual initially establishing an organization's account is not necessarily the primary or main user with system administration permissions. We further suggest clarifying that more than one user may have such system admin permissions.
- We find the requirement to accept login terms with every login to be redundant and recommend login terms include language stating that initial acceptance of those terms governs every subsequent login.

Certification

- Please provide clarification on who can attest to application certification. Can the person submitting the application attest to its submission?
- Once an application is submitted, we recommend a system-generated e-mail is sent to the attestant, notifying them that their attestation is required to complete the application process. Since an organization can have multiple attestants, the application submitter should be able to either a) manually input the attestant's e-mail or b) choose from a list of attestants in the system.
- We'd like to request the option to submit the longitude + latitude in decimal degrees <u>OR</u> degrees, minutes, seconds (DMS). If this is not an option, is it possible to build in a conversion calculator in the system?
- Facility Identification Numbers Recommend Updating this to Facility Identification.
- Facility Identification Numbers Facility Owner For applications where the account holder is the same as the facility owner, we request adding the functionality (a checkbox) to automatically import account holder information onto this page.

Transition to Online System

- Please confirm that all eligible facilities included in an organization's merge form will be migrated into that organization's account. This may include facilities under contract to the organization/account holder who obtained certification on behalf of the facilities, where the facility owners will not be managing the facilities in their own accounts.

- Once data is migrated to the online tool, will account holders have an opportunity to review and verify data accuracy prior to the RPS Online System going live on October 12th? What steps/processes will be available for possible data corrections?

Upcoming Workshop

- Please provide an overview of what will take place during the September 28, 2016 'Workshop to Demonstrate Accounts.'

General/Other

- Please confirm that data points not required under prior guidebooks may be presented in the online tool but are not required to be updated via an amended application unless desired by the account holder/organization.
- We recommend updating the title of the webpage from 'RPS/RPS Home' to 'CEC RPS System' to clearly identify the webpage; particularly if a user has multiple tabs open within a single browser.



PacifiCorp appreciates the opportunity to offer comments on the Renewables Portfolio Standard Online System and looks forward to working with the CEC on its implementation.

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