

## DOCKETED

<b>Docket Number:</b>	16-RPS-02
<b>Project Title:</b>	Appeal by Los Angeles Department of Water & Power re Renewables Portfolio Standard Certification Eligibility
<b>TN #:</b>	213981
<b>Document Title:</b>	Supplemental Declaration of Christina Crume
<b>Description:</b>	Declaration
<b>Filer:</b>	Darlene Burgess
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	10/12/2016 2:13:43 PM
<b>Docketed Date:</b>	10/12/2016

**BEFORE THE ENERGY RESOURCES CONSERVATION AND  
DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA**

In the Matter of:

Appeal by LADWP re  
RPS Certification or Eligibility

Docket No.: 16-RPS-02

**SUPPLEMENTAL DECLARATION OF CHRISTINA CRUME**

I, Christina Crume, declare as follows:

1. I am an Energy Commission Specialist I in the Renewables Portfolio Standard unit at the California Energy Commission. I have worked at the Energy Commission since 2012.
2. As an Energy Commission Specialist I at the Energy Commission in the Renewables Portfolio Standard unit my responsibilities include certifying electrical generation facilities as eligible renewable energy resources for the state's renewables portfolio standard (RPS); advising the Energy Commission regarding the use of biomethane and hydroelectric resources for the RPS, including conducting staff analysis for implementing legislation relating to the resources, analyzing energy data, and researching and developing rules and procedures for the RPS certification of facilities as specified in the Energy Commission's adopted RPS Eligibility Guidebook; and implementing and coordinating a web-interfaced database with GIS components with contractors to incorporate advanced spatial queries and analysis for the RPS.
3. I am authorized to make this supplemental declaration on behalf of the Energy Commission and the following matters are true and accurate to the best of my knowledge and belief.
4. Exhibit docketed as TN 213978 is a true and correct copy of the Energy Commission RPS Certificate issued to PG&E's Gateway Generating Station.
5. Exhibit docketed as TN 213969 is a true and correct copy of the Energy Commission RPS Certificate issued to SMUD's Cosumnes Power Plant.
6. Exhibit docketed as TN 213965 is a true and correct copy of the Energy Commission RPS Certificate issued to Calpine's Los Medanos Energy Center.
7. Exhibit docketed as TN 213964 is a true and correct copy of the Energy Commission RPS Certificate issued to Calpine's Pastoria Energy Facility.

8. The Pastoria Energy Facility was certified under the Energy Commission's RPS Eligibility Guidebook, Third Edition, however at the time the certificate was issued the RPS Eligibility Guidebook, Fourth Edition, was already in effect and a certificate under the RPS Eligibility Guidebook, Fourth Edition, was issued to the applicant.
9. The Los Medanos Energy Center was certified under the Energy Commission's RPS Eligibility Guidebook, Third Edition, however at the time the certificate was issued the RPS Eligibility Guidebook, Fourth Edition was already in effect and a certificate under the RPS Eligibility Guidebook, Fourth Edition, was issued to the applicant.
10. The date on RPS Certificates issued by the Energy Commission, to the PG&E, SMUD and Calpine facilities referenced above, indicated as the "Date Issued" represents that date the certificate was printed for Energy Commission Staff signature and may or may not be the date of actual certification.
11. Energy Commission Staff refers to the requirements in the Energy Commission's RPS Eligibility Guidebook, Second Edition (Second Edition Guidebook), and RPS Eligibility Guidebook, Third Edition (Third Edition Guidebook), for the delivery of biogas injected into a natural gas transportation pipeline system and delivered into California for use in an electrical generation facility as the "biomethane delivery requirements."
12. Energy Commission staff applied the "biomethane delivery requirements" in the Third Edition Guidebook to all applicants that applied for RPS certification under the Third Edition Guidebook.
13. Energy Commission Staff certified four facilities for the RPS under the Third Edition Guidebook based on the use of biogas injected into a natural gas transportation pipeline system. These facilities are the following:
  - a. Gateway Generating Station, RPS ID 60758A, owned by Pacific Gas and Electric Company (PG&E);
  - b. Cosumnes Power Plant, RPS ID 60760A, owned by Sacramento Municipal Utility District Financing Authority (SMUD);
  - c. Los Medanos Energy Center, RPS ID 61048A, owned by Los Medanos Energy Center, LLC (Calpine); and
  - d. Pastoria Energy Facility, RPS ID 61064A, owned by Pastoria Energy Facility, LLC (Calpine).

Energy Commission staff subsequently changed the RPS ID numbers for these facilities to end with an "F" instead of an "A."

14. Energy Commission Staff determined that the PG&E, SMUD and Calpine facilities referenced above satisfied the “biomethane delivery requirements” under the Third Edition Guidebook based on the documentation submitted by the applicants.
15. Energy Commission Staff determined that the documentation submitted by LADWP for the RPS certification of the Scattergood, Harbor, Valley and Haynes facilities, namely the 2009 Shell and Atmos Agreements, did not show that the biomethane procured under these agreements satisfied the “biomethane delivery requirements” as those requirements were interpreted and applied to the applications of PG&E, SMUD, and Calpine.
16. LADWP submitted documentation to the Energy Commission satisfying the biomethane delivery requirements as interpreted and applied by Energy Commission Staff under the Third Edition Guidebook for gas procured under the 2009 Shell and Atmos Agreement through a delivery contract path from Opal, Wyoming to the delivery point in California.
17. LADWP did not submit documentation to the Energy Commission to show it satisfied the biomethane delivery requirements as interpreted and applied by CEC Staff under the Third Edition Guidebook for gas procured under the 2009 Shell and Atmos Agreement from the point of injection at the designated landfills to Opal, Wyoming.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge and that this declaration was executed on October 12, 2016 at Sacramento, California.

*/S/ Christina Crume*

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**Christina Crume**

Energy Commission Specialist I  
California Energy Commission