

DOCKETED

Docket Number:	18-RPS-01
Project Title:	Complaint Against the Stockton Port District re: RPS Program Compliance
TN #:	222161-6
Document Title:	Exhibit E - Stockton Port District Complaint
Description:	Port of Stockton Response to Staff Email Transmitting Draft Verification Tables and Draft Verification Results Report for the 2011-2013 Compliance Period
Filer:	Muoi-Lynn Tran
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	1/18/2018 2:42:08 PM
Docketed Date:	1/18/2018

EXHIBIT E

**PORT OF STOCKTON RESPONSE TO STAFF EMAIL TRANSMITTING
DRAFT VERIFICATION TABLES AND DRAFT VERIFICATION RESULTS REPORT
FOR THE 2011-2013 COMPLIANCE PERIOD**

From: Tim Nichols
To: Chisholm.Emily@Energy; ["Dias, Janice"](mailto:Dias.Janice); [Villanueva, Juan@STOCKTONPORT](mailto:Villanueva.Juan@STOCKTONPORT)
Cc: ["Chris Kiriakou"](mailto:Chris.Kiriakou); [Metzker, Christopher@Energy](mailto:Metzker.Christopher@Energy); [Romazo, Olga@Energy](mailto:Romazo.Olga@Energy); [Daniels, Theresa@Energy](mailto:Daniels.Theresa@Energy); ["Tim Nichols"](mailto:Tim.Nichols)
Subject: RE: Draft RPS Verification Results Report for Compliance Period 1
Date: Tuesday, January 03, 2017 9:29:59 AM

Upon review of the Excel spreadsheet (STOCK RPS Results_Compliance Period 1) provided by the CEC on 12/23/16, the Port would request that the CEC staff add an additional check mark under:

Optional Compliance Measures Applied

Delay of Timely Compliance – Yes

As noted in the documentation provided to the CEC by the Port of Stockton in mid August 2016, throughout Compliance Period 1, the Port continued to try and develop two specific solar projects that were delayed by circumstances beyond the Port's control.

Thank You
Tim Nichols

From: Chisholm, Emily@Energy [mailto:Emily.Chisholm@energy.ca.gov]
Sent: Tuesday, December 20, 2016 10:17 AM
To: Dias, Janice; Villanueva, Juan@STOCKTONPORT
Cc: Chris Kiriakou (chris_k@cornerstoneconsulting.biz); Metzker, Christopher@Energy; Romazo, Olga@Energy; Daniels, Theresa@Energy; Tim Nichols (timn@cornerstoneconsulting.biz)
Subject: Draft RPS Verification Results Report for Compliance Period 1

Dear Publicly Owned Utility (POU) Representative:

The Energy Commission's Renewables Portfolio Standard (RPS) staff has completed the RPS verification process for Compliance Period 1 (2011-2013). Attached please find a draft version of the *Renewables Portfolio Standard Verification Results Lead Commissioner Report (Verification Results Report)* for your utility covering Compliance Period 1 (2011-2013).

The attached report contains the results of the Energy Commission's RPS verification process for Compliance Period 1 for your utility, including your POU's procurement requirements, RPS claims' eligibility, and the portfolio content category (PCC) classification of eligible RPS claims. In addition, the attached report contains the number of Renewable Energy Credits (RECs) that were applied to Compliance Period 1 and any excess procurement balance. It is important to note that this draft version of the *Verification Results Report* is not a compliance determination. The process for determining your utility's compliance with the RPS requirements will begin after the Energy Commission adopts the *Verification Results Report*.

The tables in the *Verification Results Report* contain similar data to the data that was included in the tables previously sent for your review, except that all numbers have been rounded to a whole MWh. The procurement targets have been recalculated by rounding down on the annual retail sales and rounding down on the annual target amount. All other amounts have been rounded based on standard rounding conventions, up for 0.5 and above and down if below 0.5.

Please note that the *Verification Results Report* refers to the *RPS Verification Methodology Report*, a separate document which will describe the processes Energy Commission staff use to calculate procurement requirements, verify the eligibility of RPS claims, and determine the PCC classification of claims. The *RPS Verification Methodology Report* is anticipated to be posted on the Energy Commission's website by the end of December.

Staff anticipates taking the attached *Verification Results Report* to the January 25, 2017 Energy Commission Business Meeting for Commission adoption. In advance of this, **please review the attached tables carefully, and reply to this email by close of business Wednesday, January 4, 2017, to confirm if you agree with the stated results, or if you disagree and are requesting corrections or changes.** If you disagree, please identify the specific corrections or changes you are requesting and provide documentation, as needed, to support the requested corrections or changes. Energy Commission staff will review the request and documentation provided and provide a written response to the request.

The Energy Commission appreciates your attention to this matter. If there are any questions, please reply to this email or contact Emily Chisholm at 916-654-4006, or Theresa Daniels at 916-654-4669.

Thank you,

Emily Chisholm

Renewables Portfolio Standard Unit
Renewable Energy Division
California Energy Commission
(916) 654-4006

From: Dias, Janice
To: [Energy - RPSTrack](#); Villanueva.Juan@STOCKTONPORT
Cc: chris_k@cornerstoneconsulting.biz; timn@cornerstoneconsulting.biz; Gould.Angela@Energy; Lemei.Emily@Energy; McCollough.Brian@Energy; Romazo.Olga@Energy; Metzker.Christopher@Energy; Daniels.Theresa@Energy
Subject: RE: RPS Draft Eligibility Results for Compliance Period 1 for Port of Stockton
Date: Monday, December 28, 2015 9:23:22 AM
Attachments: [121231_RPS_Procurement_Plan.pdf](#)
[130104_RPS_Procurement_Plan_Advise.pdf](#)
[151224_Port_of_Stockton_CEC_REC_Report_Support_Narrative.pdf](#)
[Port_of_Stockton_\(2011-2013\)_\(with_Port_footnote_included_12-24-15\).xlsx](#)
[PUC_399.30_POU_Deliberation_on_Procurement_Plan.docx](#)
Importance: High

While the Port conditionally agrees with the 607 RECs noted in the CEC RPS Summary Claims Report, the Port wants the report to be footnoted with a Summary Narrative that further explains the additional actions taken by the Port during Compliance Period 1. For your convenience, I have attached an updated spreadsheet with the footnote included.

Additionally, I have attached the supporting documentation that was previously provided to the CEC. If you have any questions, please contact me.

Juan G. Villanueva
Projects & Contract Administration Manager
Port of Stockton
(209)946-0246
jvillanueva@stocktonport.com

From: Energy - RPSTrack [mailto:RPSTrack@energy.ca.gov]
Sent: Friday, December 18, 2015 3:27 PM
To: Villanueva, Juan
Cc: Dias, Janice; chris_k@cornerstoneconsulting.biz; timn@cornerstoneconsulting.biz; Gould.Angela@Energy; Chisholm.Emily@Energy; McCollough.Brian@Energy; Romazo.Olga@Energy; Metzker.Christopher@Energy; Daniels.Theresa@Energy
Subject: RPS Draft Eligibility Results for Compliance Period 1 for Port of Stockton

Dear Mr. Juan G. Villanueva:

The Energy Commission's Renewables Portfolio Standard (RPS) staff has completed the initial review of the RPS eligibility of claims reported for the 2011-2013 compliance period, and prepared the attached draft Verification Results tables. **We need your assistance. Please respond by December 29, 2015, to finalize verification of the eligibility of your RPS claims for the 2011-2013 compliance period.**

These tables were prepared based on 2011-2013 claims reported using both WREGIS Reports and CEC-RPS-Track forms submitted to the Energy Commission, and using the results of analyses, such as the RPS certification eligibility check, multi-fuel analysis, and overclaim analysis.

On the attached spreadsheet, you will find a Summary Claims Report table. This table provides information about the annual generation amount claimed for each facility, and is listed by reporting year and the claim's vintage year. This table includes the following information:

Reporting Year

CEC RPS ID

Facility Name

Fuel Type

Vintage Year

Annual Generation Claimed (MWh)

Eligible Generation Amount (MWh)

Amount Ineligible

Column definitions, which can be found at the bottom of this table, provide more details on the above table headings. The total claims eligible toward the RPS for compliance period 1 is shown at the bottom of column F "Annual Generation Claimed (MWh)."

Please review the attached tables carefully, and reply to this email by December 29 to confirm if you agree with the stated results, or disagree and are requesting corrections or changes. If you disagree, please identify the specific corrections or changes you are requesting and identify any documentation you can provide to support the requested corrections or changes. If Commission staff agrees with the basis of your requested corrections or changes, you will be notified and asked to submit supporting documentation by January 12, 2016. If Commission staff does not receive the necessary supporting documentation by this date or rejects the requested changes or corrections, final drafts of the tables will be publicly posted for stakeholder comment without the requested corrections or changes, which could ultimately impact your organization's demonstration of compliance with the RPS.

The Energy Commission appreciates your attention to this matter. If there are any questions, please reply to this email or contact me at 916-654-4669 as soon as possible.

Thank you.

Theresa

Theresa Daniels
Energy Specialist 1
Renewables Portfolio Standard Unit
California Energy Commission
(916) 654-4669
Theresa.daniels@energy.ca.gov

From: Dias, Janice
To: [Energy - RPSTrack](#)
Cc: [Tim Nichols \(timn@cornerstoneconsulting.biz\)](mailto:Tim.Nichols@cornerstoneconsulting.biz); [Chris Kiriakou \(chris_k@cornerstoneconsulting.biz\)](mailto:Chris.Kiriakou@cornerstoneconsulting.biz)
Subject: RPS PCC Classification Draft Results for Port of Stockton
Date: Monday, June 13, 2016 1:15:42 PM
Attachments: [Port of Stockton \(2011-2013\) - \(with Port footnote included 12-24-15\).xlsx](#)
[121231_RPS_Procurement_Plan.pdf](#)
[141027_CEC-RPS-POU_Update.xlsx](#)
[140701_RPS_POU_Narratives.pdf](#)

For the RPS Compliance Period 1, pursuant to the legislative renewable laws for publically-owned utilities, the Port of Stockton prepared a plan to meet all of its RPS goals through the development of a large utility-scale solar project located on Port facilities. However, the Port's initial procurement plan fell through in mid-2011 due to economic circumstances beyond the Port's control. The Port began a second project plan to construct a smaller scale solar project on Port facilities and supplement the project PCC 1 RECs with the purchase of additional PCC3 RECs from the California market. During the solar project development phase, the Port expended about \$54,000 in development costs to build the local project only to find that the developing California REC market had become a more cost effective approach to meeting its future RPS goals rather than build the local project. In order to not cause a large rate impact to its small base of industrial customers, during the public meeting to adopt the Port's annual budget and set electric rates, the Port decided to reserve its local solar development until the price of installed solar panels becomes more competitive with the California bundled, PCC 1 power market. Going forward in 2014, Port management has elected to cost effectively meet its RPS goals through REC market purchases, until the smaller local project becomes more cost effective or other viable alternatives are evident.

In summary, the Port established a plan to meet the Compliance Period 1 procurement through the development of a local project. During Period 1, the Port expended funds to complete the plan.

While the Port conditionally agrees with the 607 RECs noted in the CEC RPS Summary Claims Report, the Port continues to request that the report to be footnoted with the provided Summary Narrative that further explains the additional actions taken by the Port during Compliance Period 1.

For your convenience, I have attached an updated spreadsheet with the footnote included. Additionally, I have attached the supporting documentations that have been previously provided to the CEC. If you have any questions, please contact me.

Thank You,

Juan G. Villanueva
Development & Planning Manager
Port of Stockton
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(209)946-0246

From: Energy - RPSTrack [<mailto:RPSTrack@energy.ca.gov>]
Sent: Thursday, June 02, 2016 4:15 PM
To: Villanueva, Juan@STOCKTONPORT; jdias@stocktonport.com; chris_k@cornerstoneconsulting.biz; timn@cornerstoneconsulting.biz
Cc: Chisholm, Emily@Energy; Metzker, Christopher@Energy; Daniels, Theresa@Energy
Subject: RPS PCC Classification Draft Results for Port of Stockton

Dear POU Representative:

The Energy Commission's Renewables Portfolio Standard (RPS) staff has completed the review of the portfolio content category (PCC) classification of RPS claims reported for the 2011-2013 compliance period, and prepared the attached draft RPS Procurement Classification tables.

Please review the attached tables carefully, and reply to this email by June 14, 2016, to confirm that you agree with the stated results, or disagree and are requesting corrections or changes.

If you believe corrections or changes to the results are required, please identify the specific corrections or changes, and provide any documentation that supports your request. If Energy Commission staff agrees with the basis of your requested corrections or changes, you will be notified and asked to submit supporting documentation by June 17, 2016. If Energy Commission staff does not receive the necessary supporting documentation by this date or rejects the requested changes or corrections, final drafts of the tables will be publicly posted for stakeholder comment without the requested corrections or changes. POUs will also have the opportunity to comment on the draft POU Verification Report, which will not be finalized until it's adopted by the Energy Commission at a business meeting.

Staff prepared these tables based on 2011-2013 claims reported using both WREGIS Reports and CEC-RPS-Track forms submitted to the Energy Commission, and the results of contract review, interconnection checks, and e-Tag and hourly meter and scheduling data analyses.

On the attached spreadsheet, you will find a Summary of RPS Procurement Classification by RPS ID table. This table provides information on the verified PCC of each claim, and is listed by RPSID number, reporting year, and the claim's vintage year. This table includes the following information:

- 1) RPS ID
- 2) Facility Name
- 3) PCC 0 Verified (MWh)
- 4) PCC 1 Verified (MWh)
- 5) PCC 2 Verified (MWh)
- 6) PCC 3 Verified (MWh)
- 7) Vintage Year
- 8) Reporting Year

The tab labeled "Verified Annual Totals," contains two tables. The first table lists both the reported and verified total PCC amounts. The second table shows the total PCC amounts for the entire

compliance period. These tables include the following information:

- 1) Reporting Year
- 2) Portfolio Content Category
- 3) Reported
- 4) Verified

The Energy Commission appreciates your attention to this matter. If there are any questions, please reply to this email or contact me at 916-654-4669 as soon as possible.

Thank you,

Theresa

Theresa Daniels
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