

DOCKETED	
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Project Title:	Complaint Against the Stockton Port District re: RPS Program Compliance
TN #:	224700
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**BEFORE THE ENERGY RESOURCES CONSERVATION AND
DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA**

In the Matter of:

COMPLAINT AGAINST STOCKTON PORT
DISTRICT FOR NONCOMPLIANCE WITH THE
RENEWABLES PORTFOLIO STANDARD

Docket No. 18-RPS-01

DECLARATION OF THERESA DANIELS

This declaration is provided in response to the Committee's order of September 7, 2018, *Notice of Committee Hearing* (Order), which directs Energy Commission staff (Staff) to 1) provide declarations to authenticate each of the documents included as exhibits to its complaint against the Stockton Port District (Port) and 2) re-docket each of the exhibits with Bates stamps.¹

I, Theresa Daniels, declare as follows:

1. I am an Energy Specialist II in the RPS Verification Unit of the Renewable Energy Office of the Renewable Energy Division of the California Energy Commission (CEC). I have worked at the CEC since February, 2009.
2. As an Energy Specialist II in the RPS Verification Unit my responsibilities include gathering information from local publicly owned electric utilities (POU) on procurement claims for the Renewables Portfolio Standard (RPS), evaluating such information to verify a POU's procurement claims, and determining a POU's compliance with its RPS procurement requirements.
3. As an Energy Specialist II working in the RPS Verification Unit I have personal knowledge of the information gathered from and submitted by the Port to verify its procurement claims for the RPS compliance period 1, worked on the CEC's verification of the Port's procurement claims for RPS compliance period 1, and also worked on the CEC's determinations of the Port's compliance with its RPS procurement requirements.

¹ TN 224659, p.2.


4. I am authorized to make this declaration on behalf of the CEC and the following matters are true and correct to the best of my knowledge and belief.
5. Exhibit B re-docketed as TN 224688 is a true and correct copy of i) the completed RPS Compliance Report Forms submitted by the Port to the CEC on June 5, 2014 and October 28, 2014 for RPS compliance period 1, 2011-2013, ii) documentation submitted by the Port to the CEC with its RPS Compliance Report Forms on November 22, 2013, including two confirmation agreements between the Port and Shell Energy North America (U.S.), L. P., and the Port's Compliance Report Form 2011-13 Narratives, dated July 1, 2014, iii) the Port's Renewable Portfolio Standard Compliance Period 1 Supplemental Narratives submitted to the CEC on November 22, 2013, July 1, 2014, and August 15, 2016, iv) the Port's Compliance Report Form Narratives, dated November 21, 2013 submitted to the CEC, and v) the Port's California RPS State Provincial Voluntary Compliance Report, submitted by email July 3, 2014 to the CEC. The Port's completed RPS Compliance Report Forms are Bates stamped CEC000013 - CEC000067. The Port's two confirmation agreements with Shell Energy North America are Bates stamped CEC000068 - CEC000077. The Port's Compliance Report Form 2011-13 Narratives, dated July 1, 2014, is Bates stamped CEC000078 - CEC000081. The Port's Renewable Portfolio Standard Compliance Period 1 Supplemental Narratives are Bates stamped CEC000082 - CEC000088. The Port's Compliance Report Form Narratives, dated November 21, 2013, are Bates stamped CEC000089 - CEC000092. The Port's California RPS State Provincial Voluntary Compliance Report, submitted by email July 3, 2014, are Bates stamped CEC000093 - CEC000097.
6. Exhibit C re-docketed as TN 224689 is a true and correct copy of i) the CEC's draft RPS verification results tables for compliance 1 for the Port dated December 18, 2015 and June 2, 2016 and ii) the CEC's draft RPS Verification Results report for compliance period 1 for the Port prepared by CEC on or about December 2016. The draft RPS verification results tables are Bates stamped CEC000100 - CEC000103. The draft RPS Verification Results report is Bates stamped CEC000104 - CEC000107.
7. Exhibit D re-docketed as TN 224690 is a true and correct copy of i) the CEC's email to the Port, dated August 8, 2016, transmitting the CEC's draft RPS verification results tables for compliance 1 for the Port and ii) the CEC's email to the Port, dated December 20, 2016,

transmitting the CEC's draft RPS Verification Results report for compliance period 1 for the Port, iii) the CEC's email to the Port, dated December 18, 2015, transmitting the CEC's initial review of the RPS eligibility of the Port's procurement claims and draft RPS verification results tables for compliance 1, and iv) the CEC's email to the Port, dated June 2, 2016, transmitting the CEC's review of the portfolio content category (PCC) classification of the Port's RPS procurement claims for compliance period 1 and draft RPS procurement classification tables for the Port. The CEC's email to the Port, dated August 8, 2016, is Bates stamped CEC000110. The CEC's email to the Port, dated December 20, 2016, is Bates stamped CEC000111 - CEC000112. The CEC's email to the Port, dated December 18, 2015, is Bates stamped CEC000113 - CEC000114. The CEC's email to the Port, dated June 2, 2016, is Bates stamped CEC000115 - CEC000116.

8. Exhibit E re-docketed as TN 224691 is a true and correct copy of the Port's response to Staff's email transmitting the draft verification tables and draft verification results report for the compliance period 1 to the Port. The Port's response is included in emails dated December 28, 2015, June 13, 2016, and January 3, 2017. The December 28, 2015 email is Bates stamped CEC000121 - CEC000122. The June 13, 2016 email is Bates stamped CEC000123 - CEC000125. The January 3, 2017 email is Bates stamped CEC000119 - CEC000120.
9. Exhibit G re-docketed as TN 224693 is a true and correct copy of the Port's RPS Procurement Plan, dated November 20, 2012, which was submitted to the CEC on or about January 4, 2013. The Port's RPS Procurement Plan is Bates stamped CEC000530 - CEC000540.

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.

This declaration is executed on September 13, 2018, at Sacramento, California.



Theresa Daniels
Energy Specialist II
RPS Unit of Renewable Energy Division
California Energy Commission