

DOCKETED	
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Project Title:	Complaint Against the Stockton Port District re: RPS Program Compliance
TN #:	224702
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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 KATHARINE LARSON

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, Katharine Larson, declare as follows:

1. I am an Energy Commission Specialist I in the Renewable Energy Office of the Renewable Energy Division of the California Energy Commission (CEC). Prior to this time, I was an Associate Energy Specialist in the Renewable Energy Office. I have worked at the CEC since 2014.
2. As an Associate Energy Specialist in the Renewable Energy Office my responsibilities included gathering information from local publicly owned electric utilities (POU) regarding the application of optional compliance measures for the Renewables Portfolio Standard (RPS) compliance period 1, 2011-2013, and evaluating this information to determine if a POU satisfied the requirements of optional compliance measures to excuse the POU's RPS procurement deficits.
3. As an Energy Commission Specialist I and in my prior role as an Associate Energy Specialist working in the Renewable Energy Office I have personal knowledge of the

¹ TN 224659, p.2.

information gathered from and submitted by the Port for purposes of evaluating its application of optional compliance measures for the RPS compliance period 1.

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 F re-docketed as TN 224692 is a true and correct copy of i) the evaluation performed by Staff of the optional compliance measures applied by the Port to excuse its RPS procurement deficits for compliance period 1 and ii) the materials submitted to the CEC by the Port to justify its application of optional compliance measures for compliance period 1. Staff's evaluation of the Port's application of optional compliance measures for compliance period 1 is Bates stamped CEC000128 - CEC000136. The materials submitted by the Port to the CEC to justify the Port's application of optional compliance measures are Bates stamped CEC000138 - CEC000526 and include the following documents:
 - a. Copy of the Stockton Port District Board of Commissioners Resolution #7681, dated August 2, 2010 (Bates stamped CEC000138 - CEC000139);
 - b. Certification of the passage of the Stockton Port District Board of Commissioners Resolution #7832 on June 3, 2013, approving the Port's budget for fiscal year 2013-14 (Bates stamped CEC000140);
 - c. The Port's RPS Procurement Plan, dated November 20, 2012 (Bates stamped CEC000142 - CEC000152);
 - d. The Port's Notice of its December 20, 2012, public meeting to review implementation of the Port's RPS procurement plan, submitted August 15, 2016 (Bates stamped CEC000154);
 - e. The Port notice to the CEC dated January 4, 2013, with final planning document for the Port's RPS procurement plan, submitted August 15, 2016 (Bates stamped CEC000156);
 - f. The Port's Narratives included with the Port's 2013 RPS compliance report, dated July 1, 2014 (Bates stamped CEC000158 - CEC000161);
 - g. The Port's response dated August 15, 2016, to Staff inquiry (Bates stamped CEC000162 - CEC000167);

- h. The Port's supplemental narrative and timeline for RPS compliance period 1, dated August 15, 2016 (Bates stamped CEC000168 - CEC000182);
- i. Spreadsheet of Port's RPS expenses from 2010-2015 (Bates stamped CEC000184 - CEC000190);
- j. The Port's RPS Procurement Plan 2016 Update dated August 11, 2016, submitted August 15, 2016 (Bates stamped CEC000192 - CEC000195);
- k. The Port's Response dated August 17, 2017, to Staff Data Request dated July 19, 2017 (Bates stamped CEC000196 - CEC000202);
- l. The Port's Response to Staff Data Request dated September 5, 2017 (Bates stamped CEC000204 - CEC000206);
- m. The Port's April 27, 2012 comments on pre-rulemaking for the CEC's *RPS POU Regulations*, submitted August 15, 2016 (Bates stamped CEC000208 - CEC000211);
- n. Supporting materials for the Port's purchase of Renewable Energy Credits (RECs) for compliance period 1, including a confirmation agreement with Shell Energy North America (U.S.), L.P., accounting information for the purchased RECs, WREGIS registration and REC transfer information conveyed in a memo dated January 10, 2012, and a completed WREGIS/State/Provincial/Voluntary Compliance Report and e-tag Summary Report Attestation Form, submitted August 15, 2016 (Bates stamped CEC000212 - CEC000272);
- o. The Port's supporting materials for the CAISO cluster study required for the 20 MW solar project and subsequent delay, including various Port emails, submitted August 15, 2016 (Bates stamped CEC000274 - CEC000287, CEC000290 - CEC000291);
- p. The Port's other supporting materials for the proposed 20 MW solar project, including Port study requirements, notice to Pacific Gas and Electric Company (PG&E), and notification from the developer to cease pursuit of the project, submitted August 15, 2016 (Bates stamped CEC000288 - CEC000289, CEC000292 - CEC000317);
- q. The Port's supporting materials for the required PG&E system impact studies for the 1.5-2 MW solar project, submitted August 15, 2016 (Bates stamped CEC000326 - CEC000376, CEC000380 - CEC000440);

- r. The Port's other supporting materials for the proposed 1.5-2 MW solar project, including proposed funding, notice to PG&E, consultant recommendation on project cost-effectiveness, and notification to contract bidder of Port's decision to put the project on hold, submitted August 15, 2016 (Bates stamped CEC000318 - CEC000324, CEC000378 - CEC000379);
 - s. Project proposals received by the Port and related materials, including recommendations and proposed timelines from the Port consultant, submitted August 15, 2016 (Bates stamped CEC000442 - CEC000466); and
 - t. Other miscellaneous documents including supporting materials for the Port's REC purchases in 2014, Port memo re the CEC's adoption of the *RPS POU Regulations*, Port presentation on its RPS procurement plan, and the Port's reports on cost of renewables in California, submitted August 15, 2016 (Bates stamped CEC000468 - CEC000526).²
6. Exhibit H re-docketed as TN 224694 is a true and correct copy of the Port's response to Staff's data request of September 5, 2017, dated on September 7, 2017. The Port's response to Staff's data request is Bates stamped CEC000543 - CEC000545.

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.



Katharine Larson
Energy Commission Specialist I
Renewable Energy Division
California Energy Commission

² Along with these miscellaneous documents, the Port also submitted copies of the CEC's adopted *RPS POU Regulations* from 2013 and the CEC's RPS compliance reporting forms, neither of which were included as part of Exhibit F.