

DOCKETED	
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Project Title:	Complaint Against the Stockton Port District re: RPS Program Compliance
TN #:	224809
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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

SUPPLEMENTAL DECLARATION OF KATHARINE LARSON

This supplemental declaration is provided in response to Hearing Officer Caryn Holmes September 17, 2018 Memorandum (Memo) and subsequent request at the Committee Hearing on September 18, 2018, which directed Energy Commission staff (Staff) to provide answers to questions identified in the Memo concerning evidence in the record related to the exhibits of the Complaint Against the Stockton Port District (Port).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 224735.

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 supplemental 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 to the Complaint Against Stockton Port District for Noncompliance with the Renewables Portfolio Standard (Complaint), re-docketed as TN 224692, and also identified by the Committee as Exhibit 2005, 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, which was finalized by Staff on or around December 29, 2017 (Staff Evaluation) 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. Paragraph 5 above contains more details as to the Staff Evaluation from Exhibit 2005 than the previous submitted Declaration of Katharine Larson, dated September 13, 2018 and docketed as TN 224702, to provide the additional details requested in the Memo.
7. I am only aware of the Staff Evaluation being docketed in this CEC proceeding (18-RPS-01), provided to the Port on or about December 29, 2017, and made public by the CEC as part of this CEC proceeding.
8. Item 2 from the list of materials referenced in the Staff Evaluation appearing on Bates stamped CEC000128 included in Exhibit F to the Complaint, re-docketed as TN 224692, and also identified by the Committee as Exhibit 2005, the Port's Renewable Portfolio Standard Procurement Plan dated November 20, 2012, is the same document as Exhibit G to the Complaint, re-docketed as TN 224693, and identified by the Committee as Exhibit

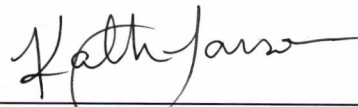
² Along with these miscellaneous documents, the Port also submitted copies of the CEC's adopted *RPS POU Regulations* from 2013 and the CEC's RPS compliance reporting forms, neither of which were included as part of Exhibit F.

2006 (Procurement Plan). This Procurement Plan is the only RPS procurement plan received by Staff from the Port for compliance period 1.

9. Item 4 from the list of materials referenced in the Staff Evaluation appearing on Bates stamped CEC000128 of Exhibit 2005 and included in Exhibit F to the Complaint, re-docketed as TN 224692, Bates stamped CEC000156 was provided to the CEC by the Port on August 15, 2016, during the CEC's RPS optional compliance measure review process for compliance period 1 without the referenced attachments. Staff has not been able to locate the original letter that was presumably sent by the Port to the CEC in 2013 with the attachments.
10. Item 11 from the list of materials referenced in the Staff Evaluation appearing on Bates stamped CEC000128 included in Exhibit F to the Complaint, re-docketed as TN 224692, and also identified by the Committee as Exhibit 2005, Bates stamped CEC000204 - CEC000206, Port Response dated September 5, 2017, is the same document as Exhibit H to the Complaint, re-docketed as TN 224694, and identified by the Committee as Exhibit 2007.

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 27, 2018, at Sacramento, California.



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