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Verification Process Overview, just like a bank audit

Approval of this verification should not be done until all generation balances are listed for the public to view. All claims for retail sales should be in the same report to ensure all accounts balance.

Additional submitted attachment is included below.

Much of the verification of “RPS 2014-2016 Retail Sellers Procurement Verification” <https://efiling.energy.ca.gov/getdocument.aspx?tn=225117> can't be audited by the public because of dead links to source material and other not supplied supporting documentation.

Below is from Renewables Portfolio Standard Verification Methodology Report, Second Edition CEC-300-2018-008-SF <https://www.energy.ca.gov/2018publications/CEC-300-2018-008/CEC-300-2018-008-SF.pdf>.

“This Renewables Portfolio Standard Verification Methodology Report, Second Edition, describes the methods Energy Commission staff uses to:

- Verify the RPS eligibility of the renewable energy facilities from which each reporting LSE is claiming procurement.
- Verify, to the extent possible, that the amount of renewable electricity procurement claimed does not exceed the amount of renewable electricity generated by each eligible facility.”

These first two steps are not verified in “RPS 2014-2016 Retail Sellers Procurement Verification” <https://efiling.energy.ca.gov/getdocument.aspx?tn=225117>. Only a statement of “The eligible procurement claims identified in this report were from Renewables Portfolio Standard certified facilities with sufficient generation to cover the procurement amounts claimed.”.

Without a accounting of each generation source, verification is not complete.

I have reported:

Claims that are greater than generation listed in EIA data and CEC QFER data.

Claims that are not shown as approved in RPS online <https://rps.energy.ca.gov/Pages/Search/SearchApplications.aspx>.

No verification that generation environmental attributes are not claimed by others such as POU's, Green-e or other marketing programs.

Structure of verification should lead off with account balances for each generation source. This balance sheet should be much like a bank statement with dates of deposits and withdrawals and RPS eligibility approval/disapproval shown from day one of the program.

To go forward, the Energy Commission will have to go back to the beginning of the RPS program and inventory all transactions, just like a bank audit.

Perhaps the use of inventory control software can completely automate the process.

Approval of this verification should not be done until all generation balances are listed for the public to view. All claims for retail sales should be in the same report to ensure all accounts balance.

Steve Uhler
sau@wwmpd.com