

DOCKETED

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Comments on RPS Compliance Period 2

Additional submitted attachment is included below.

February 27, 2019

VIA ELECTRONIC FILING

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 18-RPS-02
1516 Ninth Street
Sacramento, California 95814-5512

Re: Docket 18-RPS-02/Renewables Portfolio Standard 2014-2016 Verification:
Comments of Pacific Gas and Electric Company on Results for Local Publicly Owned
Electric Utilities Staff Draft Reports

Pacific Gas and Electric Company (PG&E) has reviewed the Renewable Portfolio Standard (RPS) Publicly Owned Utilities (POU) Verification Results Draft Reports for Compliance Period 2 (2014-2016) and appreciates the California Energy Commission's (CEC) RPS staff's extensive efforts to conduct the necessary analysis, review and verification of POU claims. While PG&E notes that the majority of POU's met or exceeded the RPS procurement quantity requirement for Compliance Period 2, PG&E is concerned that six POU's failed to meet the target.

These same six entities also failed to meet the RPS procurement requirements in Compliance Period 1 (2011-2013). In applying the RPS requirement to POU's, the intent was for all California load-serving entities to contribute equally to the achievement of this important clean energy goal. The CEC should apply the compliance and enforcement remedies available to it to ensure overall program success.

Thank you for your work on this important topic. PG&E looks forward to the issuance of the final RPS verification reports for Compliance Period 2 and will be sure to give it our attention once it becomes available.

Sincerely,

Valerie J. Winn