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**CALIFORNIA
ENERGY COMMISSION**



California Energy Commission

COMMISSION FINAL REPORT

Renewables Portfolio Standard Verification Results

Imperial Irrigation District

Compliance Period 3 (2017-2020)

Gavin Newsom, Governor

January 2024 | CEC-300-2023-018-CMF

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DISCLAIMER

The Renewables Portfolio Standard Verification Results Reports were prepared by the California Energy Commission (CEC) staff as part of the Renewables Portfolio Standard Compliance Period 3 (2017 – 2020) Program Docket #21-RPS-01. After considering public comments, this Final Compliance Report was adopted at the December 13, 2023, business meeting. The information contained in this report is intended to be final.

RPS Verification Results: Compliance Period 3 Imperial Irrigation District

Background

The California Energy Commission (CEC) administers the state's landmark Renewables Portfolio Standard (RPS), ensures the state's utilities disclose electricity sources to consumers, supports renewable energy development, and tracks the state's progress toward its renewable energy goals. Enacted by Senate Bill 1078 (Sher, Chapter 516, Statutes of 2002) and accelerated and expanded by subsequent legislation, California's RPS establishes increasing renewable energy procurement targets spanning multiyear compliance periods for the state's electric load-serving entities (LSE). Originally applicable to retail sellers, the statewide mandatory RPS was expanded by Senate Bill X1-2 (Simitian, Chapter 1, Statutes of 2011, First Extraordinary Session) to include local publicly owned electric utilities (POU). As a result of Senate Bill 100 (DeLeón, Chapter 312, Statutes of 2018), LSEs are required to increase their procurement of eligible renewable energy resources to 60 percent of retail sales by 2030.

As part of its responsibilities, the CEC verifies the eligibility of renewable energy procured by LSEs, which include retail sellers and POUs that are obligated to participate in California's RPS. The CEC is also responsible for certifying RPS-eligible renewable energy resources, designing and implementing an accounting system to track and report renewable energy procurement for all program participants, and overseeing compliance and enforcement of POUs. The CEC participated in the development of the Western Renewable Energy Generation Information System (WREGIS), an independently administered renewable energy tracking system to verify renewable energy procurement for all program participants. The California Public Utilities Commission is responsible for compliance and enforcement for retail sellers.

Report Overview

This report covers the RPS verification results for POU procurement claims for Compliance Period 3, which covers years 2017 through 2020. The verification report provides an overview of the identified POU's results and tables, including:¹

- The POU's procurement target and portfolio balance requirements and limitations.
- The amount of eligible renewable energy credits (REC) retired, and the amount applied to meet the compliance period requirements, both shown by Portfolio Content Category classification and Long-Term Procurement Requirement classification, as applicable.

¹ The contents of verification results reports will vary for POUs with specific exclusions, exceptions, or different procurement requirements under the RPS statutes and as described in the *Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities* based on the requirements specific to that POU.

- Any deficits in meeting RPS procurement requirements for the compliance period.
- Any optional compliance measures being applied by the POU for the compliance period.
- A calculation of excess procurement accumulated in this compliance period.
- A summary of the POU's excess procurement and historic carryover, if any, including any prior balance, the amount accumulated and used in the current compliance period, and remaining balance.

In adopting this report, the CEC finds the procurement claim amounts listed are consistent with RPS certification and procurement requirements specified in the *Renewables Portfolio Standard Eligibility Guidebook, Ninth Edition (Revised)* and the *Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities* and are eligible for the RPS as indicated. Therefore, the procurement claim amounts count toward meeting the identified POU's RPS procurement requirements.

Verification Process

The methods used by the CEC to verify load-serving entity procurement claims are detailed in the *Renewables Portfolio Standard Eligibility Guidebook, Ninth Edition (Revised)*² and further explained in the *Renewables Portfolio Standard Verification Methodology Report, Third Edition*, both of which can be found at <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard>.

The verification results presented in this report are not a compliance determination. After the POU's verification results are adopted by the CEC, staff will use the verification results to determine if the POU complied with the RPS requirements for Compliance Period 3 in accordance with the *Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities*.³ The CEC Executive Director will make a compliance determination informed by the verification results presented in each POU's verification results report and, if applicable, the application of optional compliance measures by the POU. The Executive Director will issue a letter to each POU documenting the RPS compliance determination.

Verification Results

² Refer to Chapter 7 of the *Renewables Portfolio Standard Eligibility Guidebook, Ninth Edition (Revised)*.

³ The Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities, with the most recent update having taken effect July 12, 2021, are set forth in 20 CCR §§ 1240 and 3200–3208 and establish the rules and procedures by which the California Energy Commission will assess a POU's procurement actions and determine whether those actions meet the RPS requirements.

For RPS Compliance Period 3 (2017–2020), Imperial Irrigation District retired and reported 4,125,841 RECs, and 4,125,830 RECs were verified by the CEC as RPS-eligible.⁴ Each [POU's Summary Claims Report](#), which includes claim eligibility details, is available at https://www.energy.ca.gov/portfolio/documents/rps_verification_pous.html.

For Compliance Period 3, Imperial Irrigation District had a procurement target of 4,125,830 RECs, which represents 30.00 percent of its retail sales over the years 2017-2020. Imperial Irrigation District applied 4,125,830 RECs from CP 3 RPS-eligible RECs toward its procurement requirements, equaling the number of RECs needed to meet its procurement target.

⁴ The number of RECs verified by the CEC is fewer than the number of RECs retired and reported because claims were determined to be ineligible due to RECs being retired more than 36 months after the vintage and claim(s) exceeding the facility's allowable generation. Please refer to the POU's Summary Claims Report for more detail.

Procurement Target Calculation (MWh) ¹	Calendar Year	Annual Retail Sales	Soft Target Percentage	Soft Targets
	2017	3,441,631	27	929,240
	2018	3,472,081	29	1,006,903
	2019	3,325,115	31	1,030,785
	2020	3,511,826	33	1,158,902
Procurement Target				4,125,830

Verification Results	
Target	4,125,830
Applied	4,125,830
Deficit	0
Renewable Percentage	30.00%

RECs Available ²	Surplus RECs	Eligible RECs Retired in CP3	Prior Balances Available	Total RECs Available
Category 0 (PCC 0)	0	650,916	0	650,916
Pre June 2010 PCC 1	0	90,538	0	90,538
Pre June 2010 PCC 2	0	0	0	0
Pre June 2010 PCC 3	0	0		0
Category 1 (PCC 1)	0	3,384,226	0	3,384,226
Category 2 (PCC 2)	0	150	0	150
Category 3 (PCC 3)	0	0		0
Historic Carryover			0	0
Total				4,125,830

RECs Applied	Surplus RECs	Eligible RECs Retired in CP3	Prior Balances Applied	Total RECs Applied
Category 0 (PCC 0)	0	650,916	0	650,916
Pre June 2010 PCC 1	0	90,538	0	90,538
Pre June 2010 PCC 2	0	0	0	0
Pre June 2010 PCC 3	0	0		0
Category 1 (PCC 1)	0	3,384,226	0	3,384,226
Category 2 (PCC 2)	0	150	0	150
Category 3 (PCC 3)	0	0		0
Historic Carryover			0	0
Total				4,125,830

RPS Portfolio Balance Requirements (MWh) ³	
Category 1 Balance Requirement	2,538,282
Category 1 Requirement Deficit	0
Category 3 Balance Limitation	338,437
Category 3 Disallowed	0

Optional Compliance Measures Applied	
Cost Limitation	No
Delay of Timely Compliance	No
Portfolio Balance Reduction	No

CP3 Excess Procurement Calculation (MWh) ⁴	Eligible RECs Retired	RECs Applied	Deductions	Accumulated in CP3
Category 0 (PCC 0)	650,916	650,916		0
Pre June 2010 PCC 1	90,538	90,538	0	0
Pre June 2010 PCC 2	0	0	0	0
Category 1 (PCC 1)	3,384,226	3,384,226	6,084	0
Category 2 (PCC 2)	150	150	150	0

Balance of Excess Procurement and Historic Carryover (MWh)	Beginning Balance	Applied in CP3	Accumulated in CP3	Ending Balance
Category 0 (PCC 0)	0	0	0	0
Pre June 2010 PCC 1	0	0	0	0
Pre June 2010 PCC 2	0	0	0	0
Category 1 (PCC 1)	0	0	0	0
Category 2 (PCC 2)	0	0	0	0
Historic Carryover	0	0		0

1. "Soft Target" is defined in section 3204(a)(3) of the RPS POU Regulations.

2. Total RECs Verified as Available during CP 3, does not include Disallowed PCC 3 RECs.

3. Calculated as specified in Section 3204(c) of the RPS POU Regulations.

4. Calculated as described in the RPS Verification Methodology Report, Third Edition and in section 3206(a)(1) of the RPS POU Regulations.