

| <b>DOCKETED</b>         |  |
|-------------------------|--|
| <b>Docket Number:</b>   | 21-RPS-02  |
| <b>Project Title:</b>   | Renewables Portfolio Standard 10th Edition Guidebook Update  |
| <b>TN #:</b>            | 263232   |
| <b>Document Title:</b>  | Presentation - May 21 2025 Public Meeting - Scoping Meeting on Proposed Updates for the RPS Eligibility Guidebook, Tenth Edition |
| <b>Description:</b>     | N/A  |
| <b>Filer:</b>           | Rose Saga  |
| <b>Organization:</b>    | California Energy Commission   |
| <b>Submitter Role:</b>  | Public Agency  |
| <b>Submission Date:</b> | 5/21/2025 1:20:06 PM   |
| <b>Docketed Date:</b>   | 5/21/2025  |



# Scoping Meeting on Proposed Updates for the RPS Eligibility Guidebook, 10<sup>th</sup> Edition

Presenter: Siting, Transmission and Environmental Protection Division

Date: May 21, 2025



# Meeting Purpose and Scope

- Present proposed updates for RPS Guidebook 10<sup>th</sup> ed.
- Solicit feedback from stakeholders
  - Comment opportunity after each subject area
  - General comments at the end

| In Scope                             | Out of Scope                       |
|--------------------------------------|------------------------------------|
| RPS Guidebook subject matter updates | WREGIS or RPS Online System Issues |
| Impacts guidebook updates may have   | Verification & Compliance Results  |
|                                      | Other RPS issues                   |



# Agenda

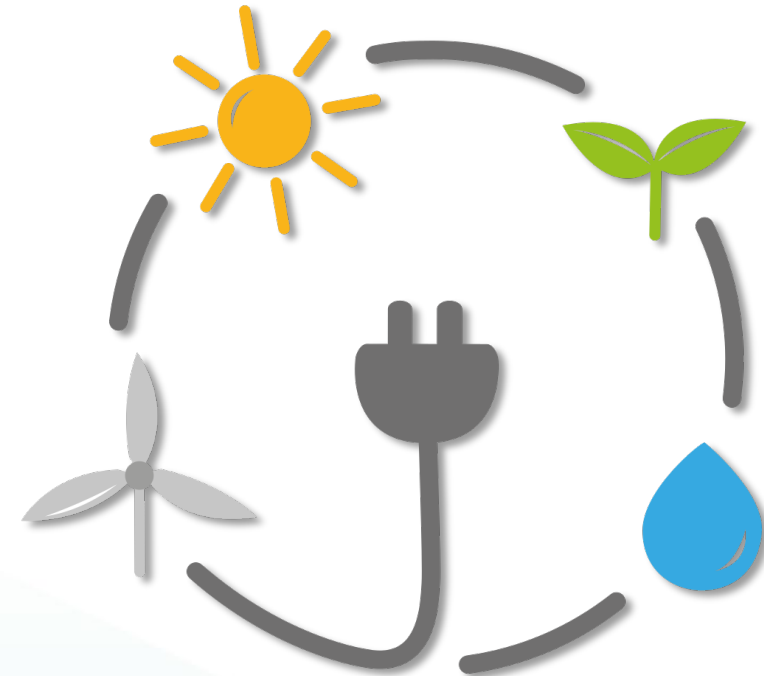
| Time              | Item  |
|-------------------|---|
| 9:00am – 9:30am   | <ul style="list-style-type: none"><li>• Overview/Logistics<ul style="list-style-type: none"><li>• Opening Remarks</li><li>• Meeting Purpose, Scope and Background Information</li><li>• Public Participation</li></ul></li></ul>  |
| 9:30am – 11:00am  | <ul style="list-style-type: none"><li>• Proposed Updates (including public comment)<ul style="list-style-type: none"><li>• 1 – Document Formatting</li><li>• 2 – Location Eligibility</li><li>• 3 – Verification &amp; Compliance Updates</li><li>• 4 – Energy Storage</li><li>• 5 – Metering Requirements</li></ul></li></ul>                  |
| 11:00am – 11:15am | <ul style="list-style-type: none"><li>• Break</li></ul>   |
| 11:15am – 12:45pm | <ul style="list-style-type: none"><li>• Proposed Updates (including public comment)<ul style="list-style-type: none"><li>• 6 – Distributed Generation</li><li>• 7 – Facilities with Air Permits</li><li>• 8 – Biomethane Delivery Requirements</li><li>• 9 – Linear Generators and Fuel Cells</li></ul></li><li>• Other Issues Raised</li></ul> |
| 12:45pm – 1:00pm  | <ul style="list-style-type: none"><li>• Schedule and Next Steps</li></ul>   |





# California's RPS

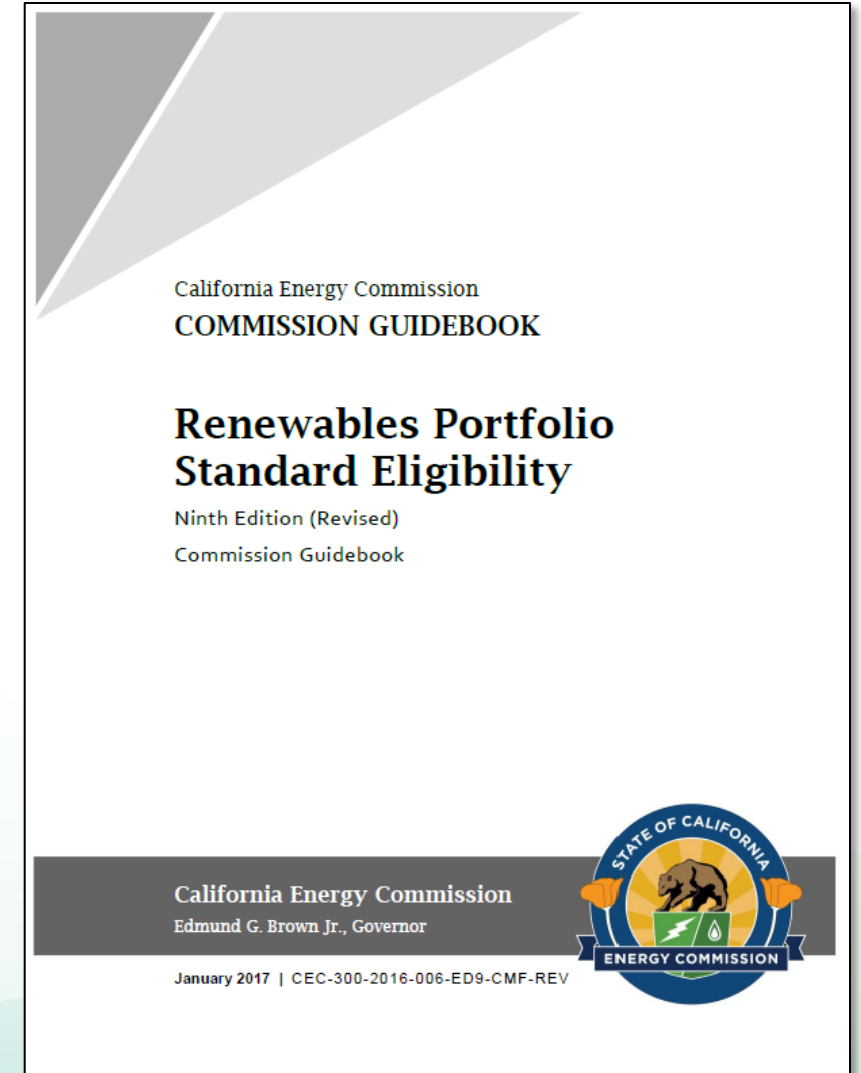
- Mandates state load-serving entities (LSE) to procure **renewable energy**
- **Procurement amounts** proportional to retail sales, measured in MWh
- Targets progressively increase, current mandate is **60% by 2030**
- Many different **renewable resource types** are eligible





# The Eligibility Guidebook

- RPS facility certification requirements
- RPS eligible renewable resource definitions
- Annual reporting requirements
- [RPS Eligibility Guidebook, 9<sup>th</sup> Edition \(Revised\)](#)





# Process to Date

Oct 2024

- Initial scope of Guidebook updates issued
- Major Topics: Energy Storage, Metering, Location, Distributed Generation, Bioenergy
- 21 organizations gave public comments

Jan 2025

- Assembly Bill 1921 (Papan, 2024) effective, linear generators eligible for RPS

May 2025

- Presentation of proposed RPS Guidebook updates
- Solicit public comments



# Opening Remarks





# Presentation Structure

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## Background

- Why this item is being addressed

## Current Requirements

- Language in current RPS Guidebook (9<sup>th</sup> edition)

## Proposed Update

- Staff concept for RPS Guidebook 10<sup>th</sup> Ed

## Questions for Stakeholders

- Guiding questions, then public comment discussion



# Participation

## 1. Webinar

- Being recorded via Zoom

## 2. Public Comment Options

- Use “raise hand” feature in Zoom
- Over telephone: dial \*9 to “raise hand” and \*6 to mute/unmute
- Type your question in the Q&A window

## 3. Written Comment

- Due by 5:00 P.M. on **June 5, 2025**
- Submit through the e-commenting system (**21-RPS-02**) at:  
<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=21-RPS-02>
- Subscribe to CEC General Renewable Energy Programs at:  
<https://public.govdelivery.com/accounts/CNRA/signup/31911>



# Public Comment / Questions

## Instruction

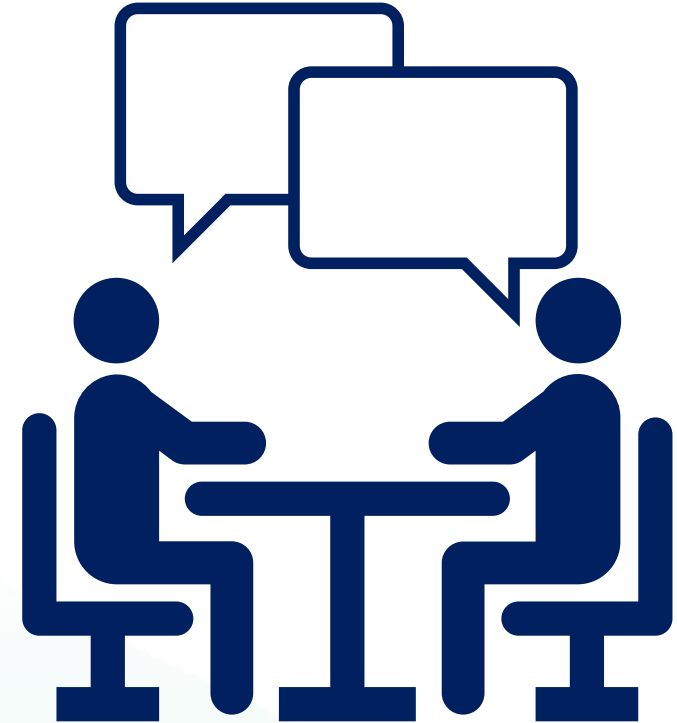
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## Zoom App

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## Telephone

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# Item 1: Document Formatting



# Guidebook Structure – 9<sup>th</sup> Edition

Alphabetical and numerical heading styles

No navigation pane / bookmarks

Non-interactive table lists

Out-of-date language, hyperlinks, etc.

## CHAPTER 4: RPS Online System

The Energy Commission developed the RPS Online System for the RPS program to streamline the RPS certification application and reporting processes. The RPS Online System is at <https://rps.energy.ca.gov/>. This chapter provides an overview of the RPS Online System, including the account management, certification application, and reporting processes. Instructions on how to use the RPS Online System will be made available within the RPS Online System.<sup>36</sup>

Applicants shall use the RPS Online System starting January 25, 2017, when the *RPS Guidebook, Ninth Edition*, takes effect. The Energy Commission requests applicants to submit applications for certification including supplemental forms using the forms in the *RPS Guidebook, Eighth Edition* no later than January 6, 2017, to allow time to transition to the RPS Online System. Applications received between January 6, 2017, and January 25, 2017, the adoption date of the *RPS Guidebook, Ninth Edition*, may be delayed during the transition to the RPS Online System.

If the RPS Online System is down for maintenance or there is a systemwide outage and users need to submit applications, reports, and other documents, users may contact RPS staff at [RPSTrack@energy.ca.gov](mailto:RPSTrack@energy.ca.gov) for assistance.

### A. Account Management

The RPS Online System will have an account structure for each LSE or facility owner called an "organization." Each organization will have the ability to add or remove individuals called "users" and assign roles such as "applicant," "attestant," or "trainee," with at least one individual assigned as the "Account Holder System Admin." Each role is defined in the RPS Online System instructions.

#### 1. Account Users

Within the organization account, the users will have permissions based on their assigned role(s). For example, a user may be assigned a role and have the ability to view an application, but may not have the ability to attest to an application. All account users will receive notifications within the RPS Online System and email alerts for specific activities taken or due to be taken.

<sup>36</sup> Any updates to the RPS Online System instructions do not need to be adopted by the Energy Commission as the instructions are procedural and do not include RPS requirements not specified in the guidebook.



# Proposal

Navigation pane functionality

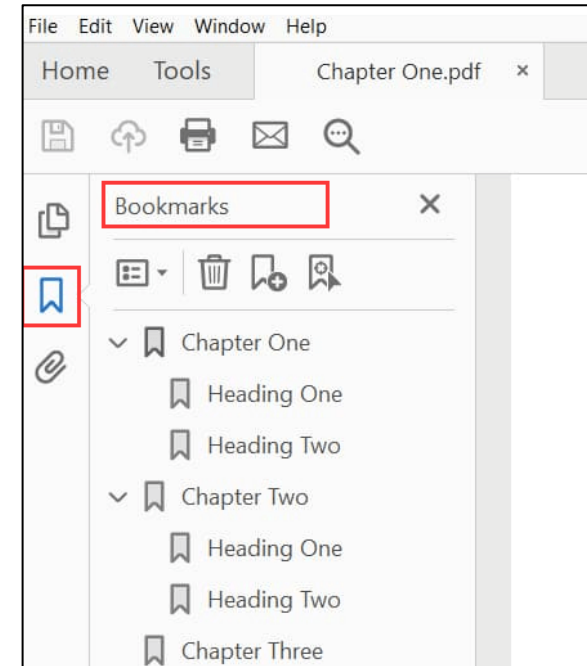
Interactive Table of Contents

Update information: WREGIS references, email options

Modify numbering list styles

Guidebook section reference / website hyperlinks

Heading Style Improvement



*Source: EasePDF*



For more information, see [Chapter 1.1. RPS Legislation.](#)

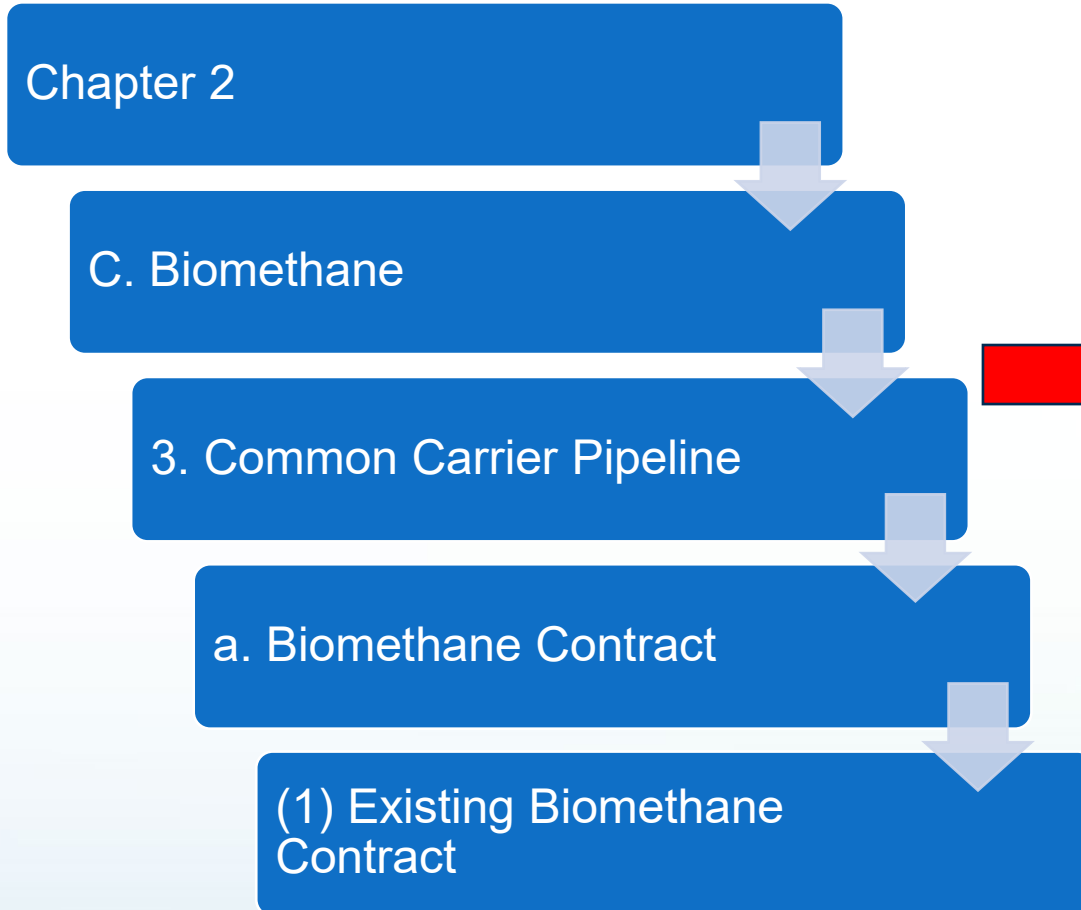
*Source: Energy Commission*



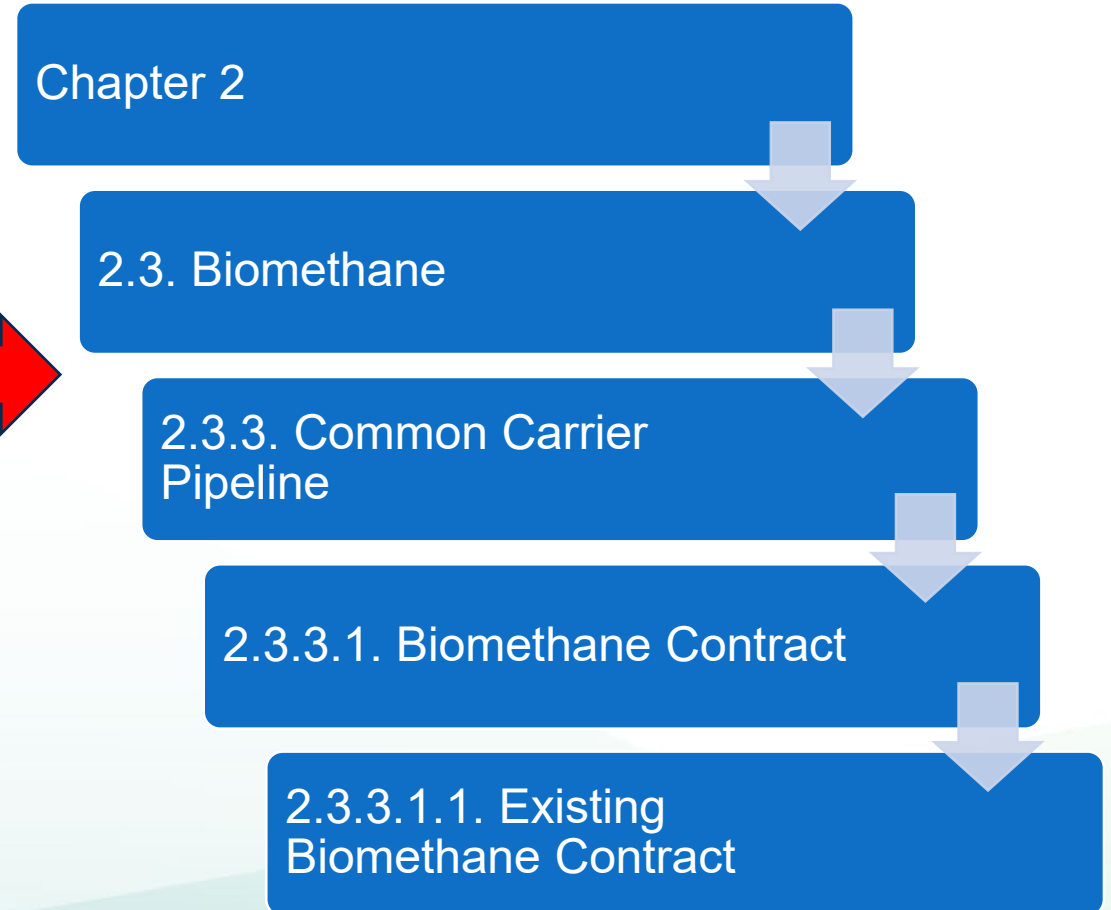


# Heading Style

- Current: 9<sup>th</sup> Edition



- Draft: 10<sup>th</sup> Edition





# Questions

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1. Suggestions for additional formatting/organizational changes?
2. Suggestions for what should not be changed?



# Public Comment / Questions

## Instruction

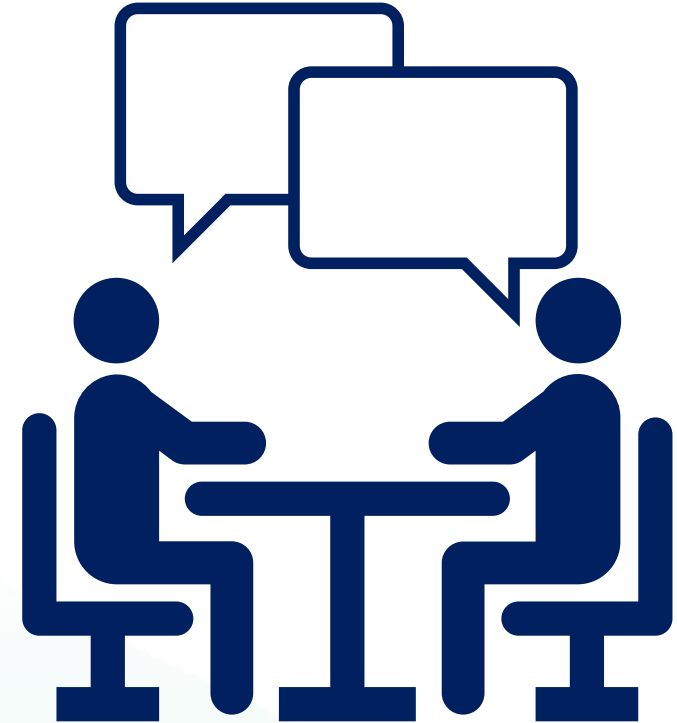
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## **Item 2: Location Eligibility**



# State Policy Initiatives

## Senate Bill (SB) 100

- RPS-eligible and zero-carbon resources
  - Supply 100% of CA's electric retail sales (2045)

## Assembly Bill (AB) 525

- Offshore Wind Strategic Plan
  - Plan for development off CA coast

## Senate Bill (SB) 605

- Wave and Tidal Offshore Renewable Energy
  - Evaluate technology feasibility, cost, and benefits
  - Identify suitable sea space for technologies

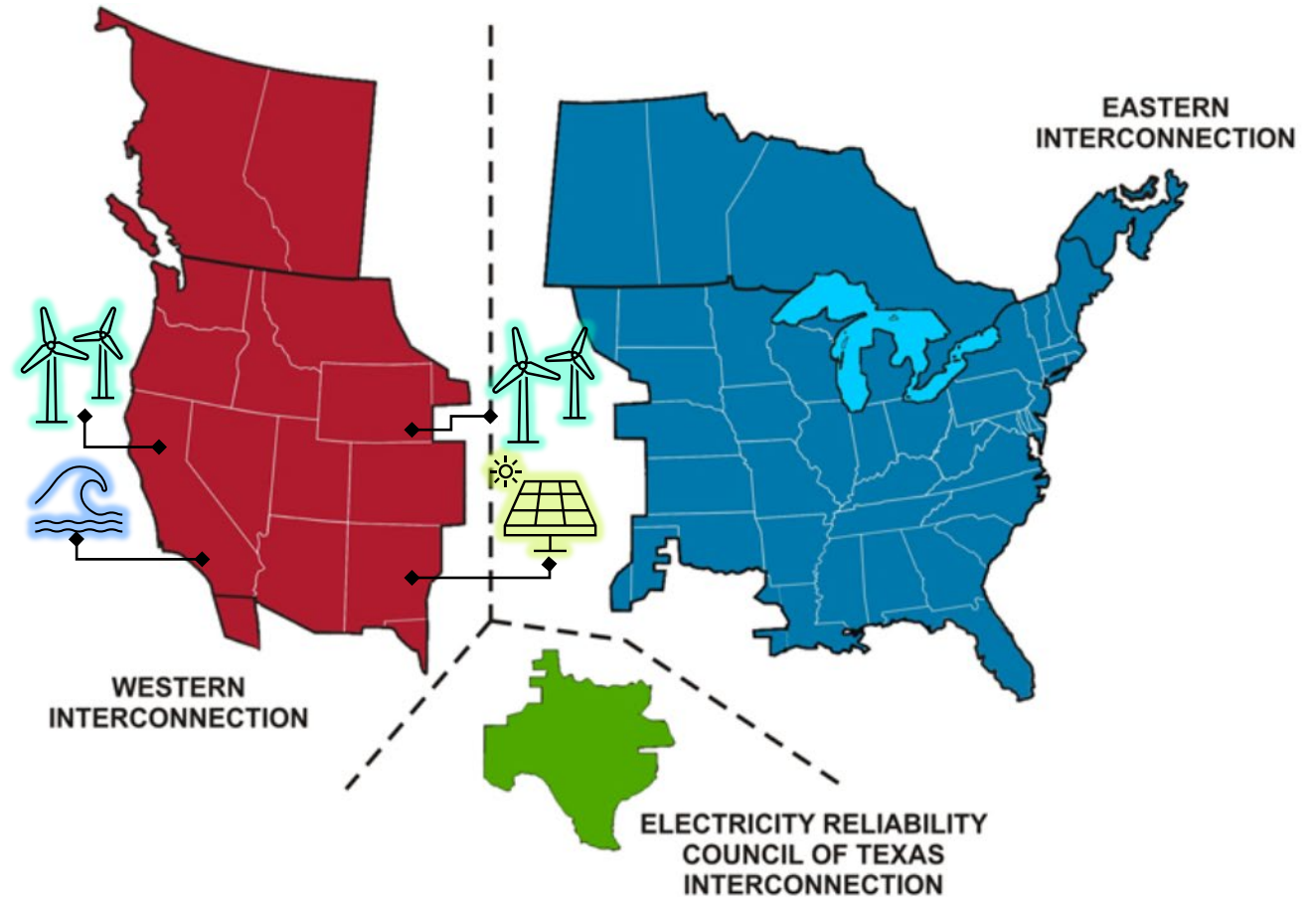


Source: Energy Commission



# Current Requirements

- Must have first Point of Interconnection within Western Interconnection
- No reference to physical location in WECC
- No reference to offshore facilities
- **Physical location outside Western Interconnection allowed, but...**



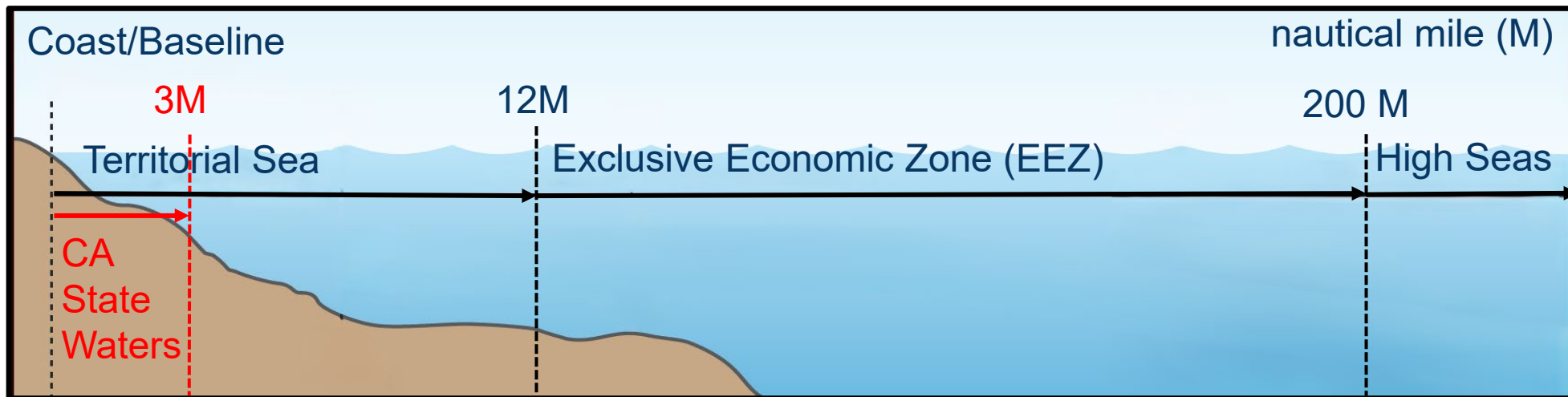
Source: Department of Energy





# L.O.R.S. Documentation

Source: NOAA



## Subject to L.O.R.S. Requirements?

|                          | Located within CA or state waters | Located outside CA or within EEZ | Located outside U.S. or international waters |
|--------------------------|-----------------------------------|----------------------------------|--|
| Interconnects to CBA     | No                                | No                               | Yes  |
| Interconnects to non-CBA | Yes                               | Yes                              | Yes  |



# Proposed Clarifications

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Maintain first point of interconnection must be within Western Interconnection

Clarify facilities may be physically outside the Western Interconnection

References to offshore facilities in L.O.R.S. section



# Public Comment / Questions

## Instruction

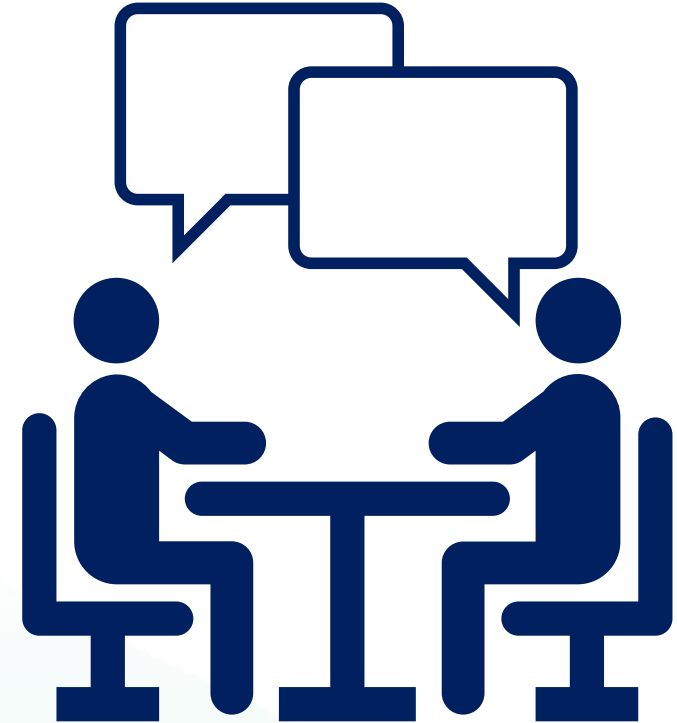
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# **Item 3: Verification & Compliance Administrative Updates and Clarifications**



# Proposed Verification & Compliance Updates

1-WREGIS retirement account naming convention

- Long-term procurement update for POUs

2-WREGIS adjustments

- Clarify timeframes and supporting documentation

3-REC retirements

- Remove inconsistent rule limiting REC usage within compliance period

4-Reporting for pseudo-tie arrangements

- Remove e-tag requirement for CEC



# Questions

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1. Are there additional clarifications related to the Verification and Compliance sections of the Guidebook that should be addressed?
2. In terms of structure and formatting, should load-serving entity reporting for verification (Chapter 7) be presented differently in the guidebook? Should it remain the same?





# Public Comment / Questions

## Instruction

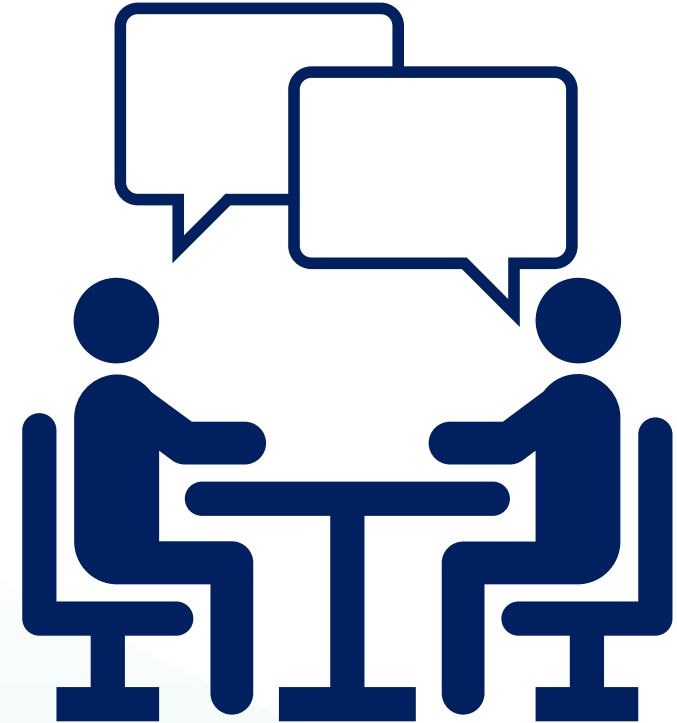
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# Item 4: Energy Storage



# Energy Storage in RPS

- Energy storage currently in the 9th edition of guidebook (2017)
- Exponential increase in storage systems from 2017 to present
- Now common for RPS resources to have energy storage onsite
- Confusion over accounting requirements regarding storage losses



*Source: Energy Commission*



# Statute

## Public Resources Code Section 25741:

(a) “Renewable electrical generation facility” means a facility that meets all of the following criteria:

(1) The facility uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells or linear generators using fuels described in this paragraph that otherwise meet the requirements of this subdivision, small hydroelectric generation of 30 megawatts or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and any additions or enhancements to the facility using that technology.

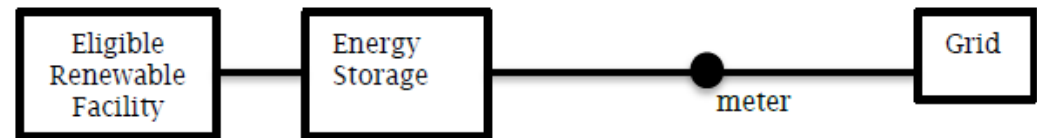


# Existing Requirements – 9<sup>th</sup> Edition

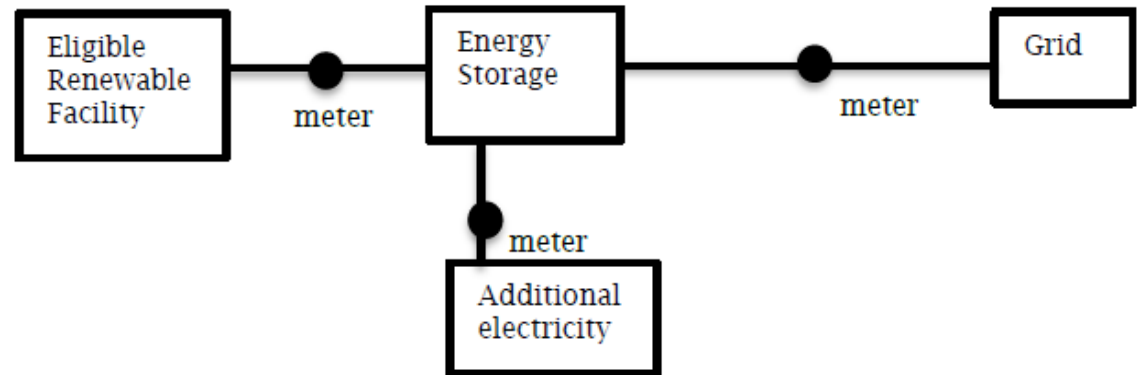
## Existing RPS Guidebook Requirements

- RECs only attributed to generation
- Standalone storage not RPS-eligible
- Storage can be an “addition or enhancement” to an RPS facility
- Additions or enhancements can be either “integrated” or “directly connected” and subject to loss accounting
- \*Unstated loss accounting when onsite storage is not considered an “addition or enhancement”

- **Integrated:**



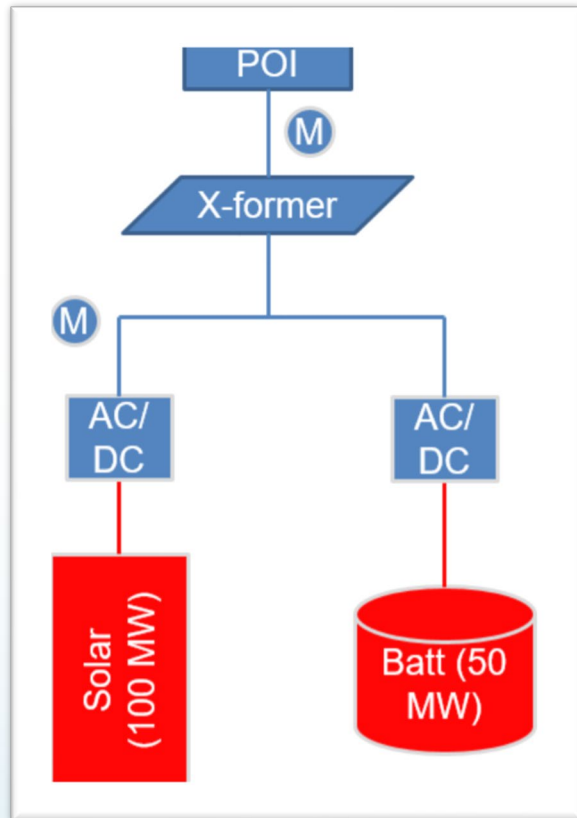
- **Directly Connected:**



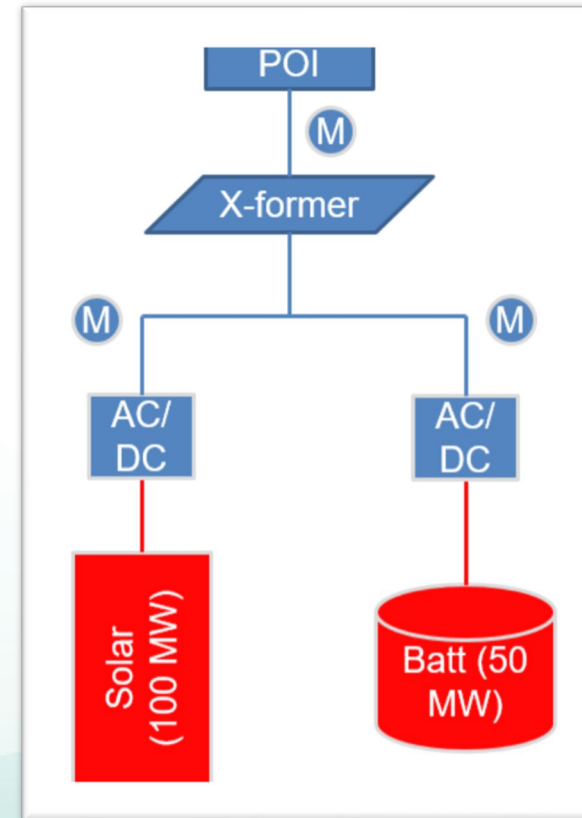


# CAISO Diagrams

## Hybrid Resource



## Co-located Resource







# 2022 Energy Storage Workshop

## Stakeholder Comments

- Misalignment with CAISO and WREGIS treatment of storage
- Requiring loss accounting for co-located storage penalizes and disincentivizes pairing storage with renewables
- Unfair treatment compared to stand-alone storage
- Disincentivizing paired storage could lead to curtailment, grid unreliability
- Need for replacement RECs could lead to increased costs to ratepayers

## Stakeholder Recommendation

- Do not deduct storage efficiency losses when determining REC eligibility



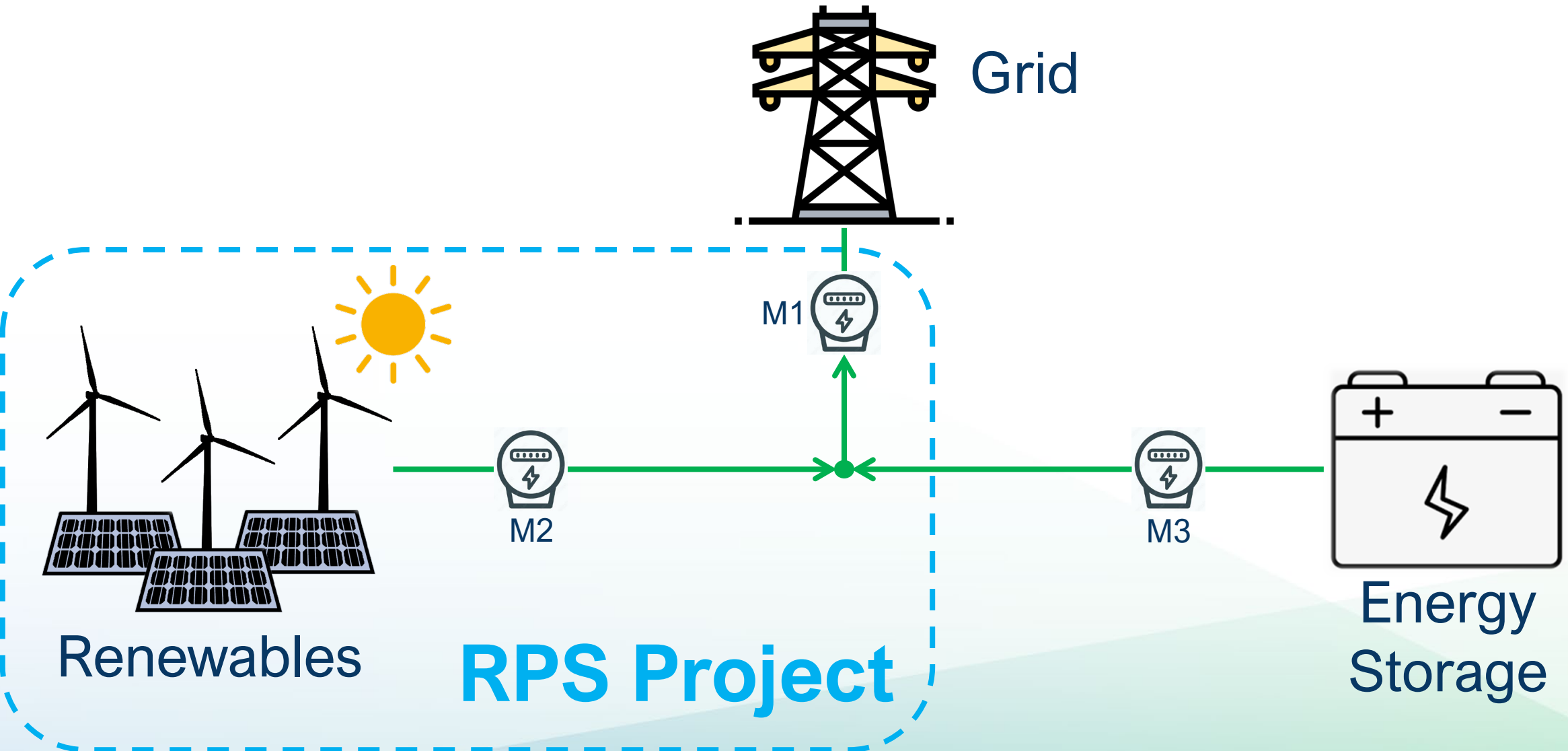
# Storage Proposal

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- 
- 1 – Diagrams/categories of energy storage removed
  - 2 – New glossary definitions added related to energy storage
  - 3 – Storage designated and metered separate from the facility not subject to loss accounting
  - 4 – Only additions or enhancements subject to loss accounting
  - 5 – All losses for interconnection needs still netted (i.e. transformer, line loss, etc.)
  - 6 – Any eligible resources used as inputs must be netted out (e.g. pumped hydro)
-



# Project Example





# Multi-stage Facilities with Storage



- Example: Solar PV feeding Pumped Storage Hydroelectric
- Proposal
  - Facilities can only claim final output as RPS-eligible
  - Input energy cannot be used for RPS compliance or any other program
  - Facility creating output electricity must be an eligible resource



# Questions

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1. Does this proposal present challenges for any specific configurations / specific technology (ie lithium-ion vs compressed air, etc)?



# Public Comment / Questions

## Instruction

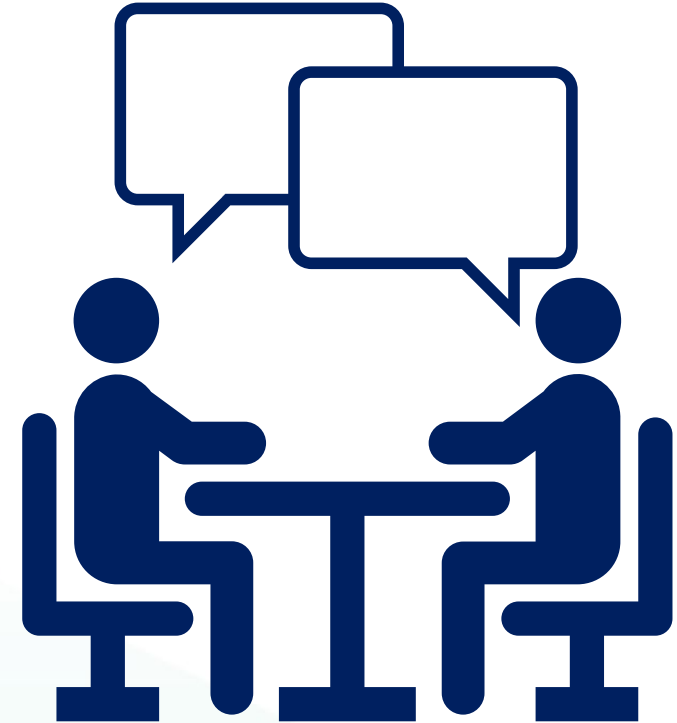
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# **Item 5: Metering Requirements**



# Current RPS Requirements

Accuracy requirement =  $\pm 2\%$

Independently verified by a third-party organization

Third-party recognized by OSHA's NRTL program

- Nationally Recognized Testing Laboratory

No direct statement a meter must measure in AC or DC

- Ambiguity on DC metering acceptance

Flexibility in generation calculation method





# WREGIS Operating Rules

RPS Facilities must meet WREGIS requirements

Measured at First Point of Interconnection

Or, adjusted to reflect energy delivered to grid

- High side of the transformer

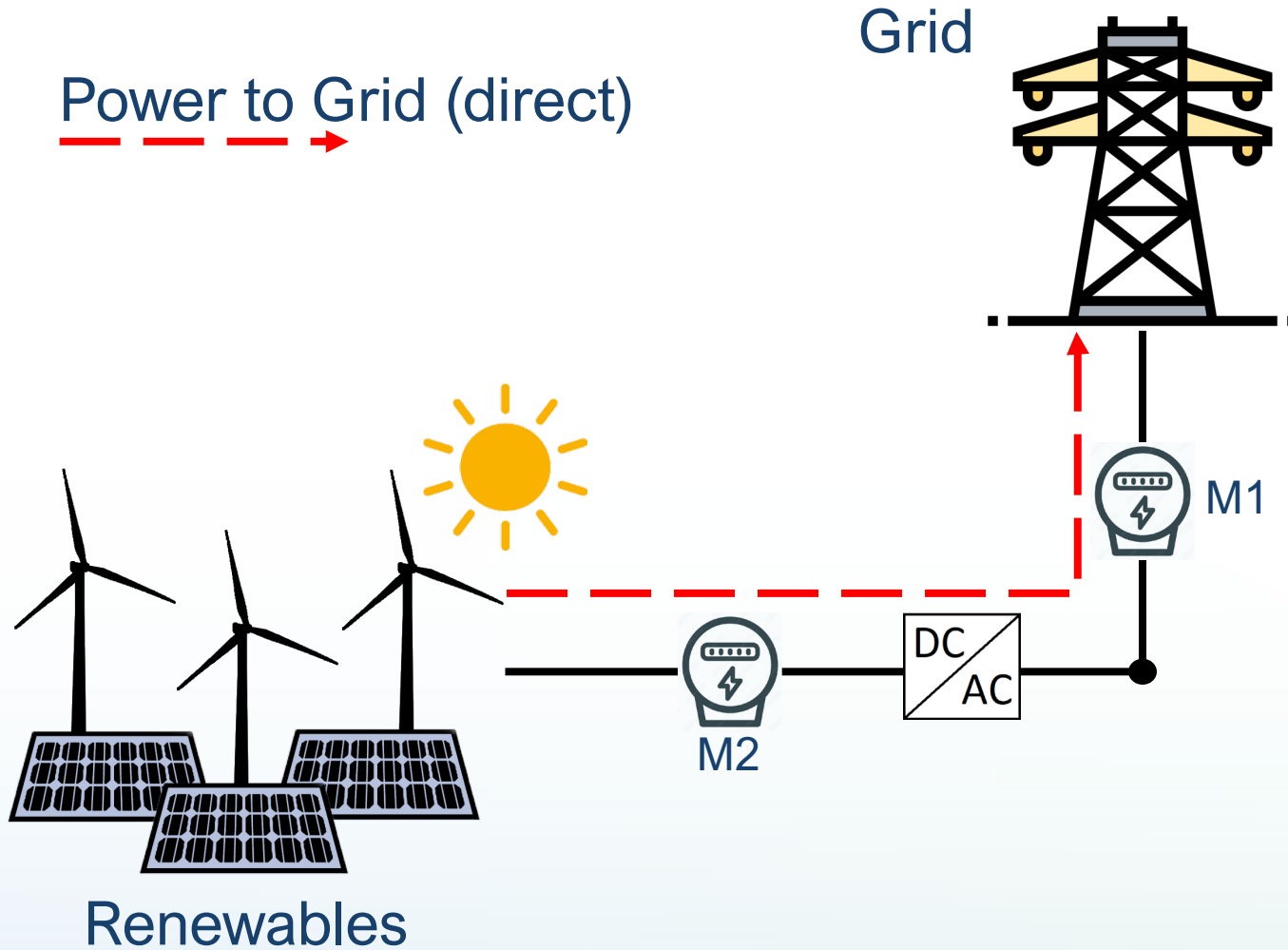
Accuracy requirement of  $\pm 0.5\%$

Flexibility under the discretion of a state program



# AC metering

Power to Grid (direct) →



- Adjustment must be made for POI or high side of transformer value
- Should credit an equivalent number of RECs for either meter

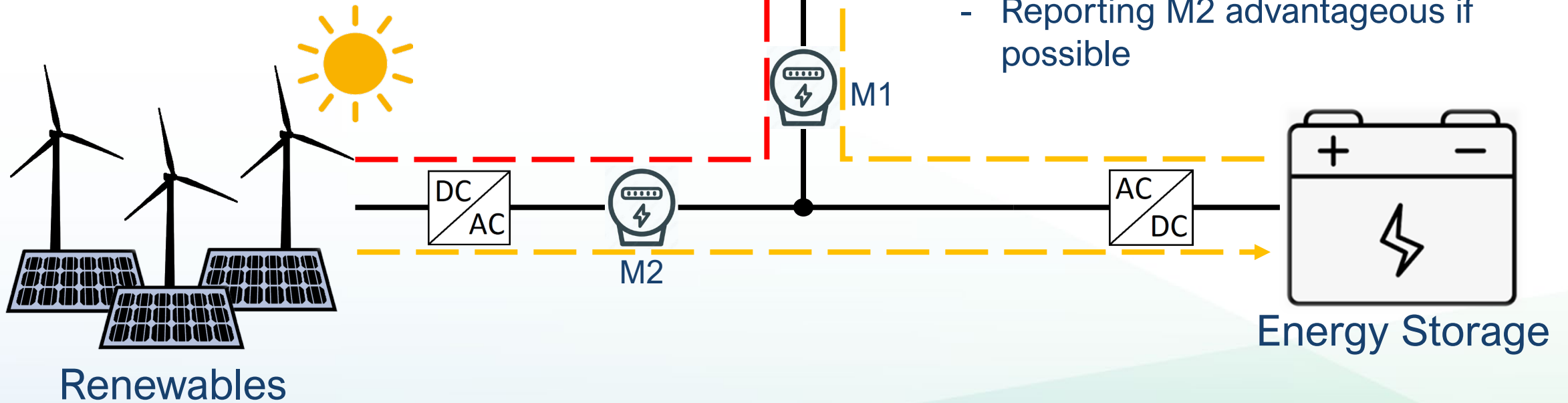


# AC-Coupled Energy Storage

Power to Grid (direct)

Power to Grid (indirect)

Grid

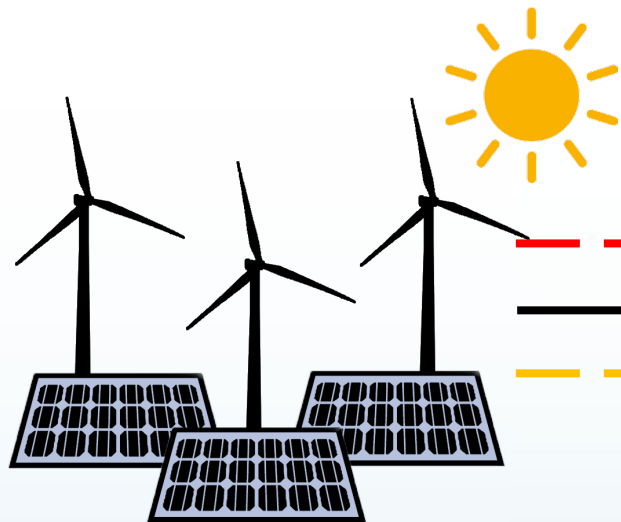




# DC-Coupled Energy Storage

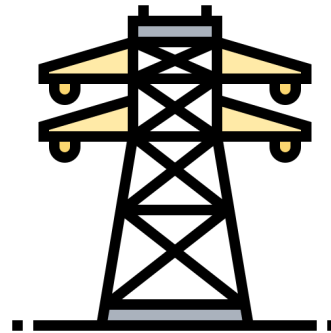
Power to Grid (direct)

Power to Grid (indirect)

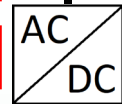


Renewables

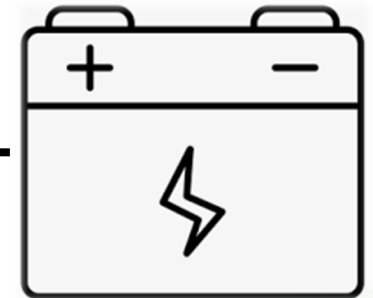
Grid



M1



M2



Energy Storage

- M2 is on DC side of system
- If reporting M1, lower generation reported due to storage
- DC meter reporting may allow same advantages of M2 of AC coupled systems



# Current Challenges

## Ambiguity on DC metering acceptance

- DC metering may not be able to meet current requirements
- Standards exist for DC metering such as ANSI C12.32-2021

## Accuracy rating has not been updated

- Established at  $\pm 2\%$  in 5<sup>th</sup> Edition Guidebook (2012)
- RPS not aligned with current WREGIS requirements



# Proposed Update

## Add language allowing DC metering

- Must be consistent with AC metering requirements:
  - Accuracy, testing, certification

## Add language requiring adjustment of DC values

- Include DC/AC conversion losses
- Adjust to value at high side of transformer
- Must be consistent with WREGIS requirements

## Update metering accuracy requirements to $\pm 0.5\%$

- A legacy clause may be added



# Public Comment / Questions

## Instruction

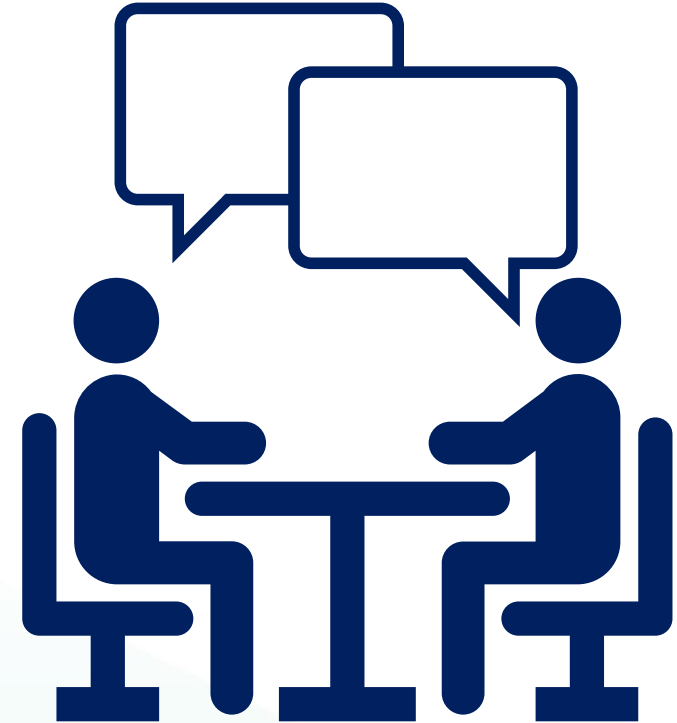
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# 15-minute Break





# **Item 6: Distributed Generation**



# Background

- Collection of individual distributed energy resources (DERs)
  - Rooftop solar
  - Battery storage
  - Demand flexible appliances
- Only generating DERs are eligible for RPS
- Increased interest in participation from developers



*Source: Energy Commission*



# Current Requirements

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Limited to wind and photovoltaic systems

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Aggregated capacity  $\leq$  250 kW

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May amend up to a max of 360 kW

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Must be commercially operational

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Precertification is not allowed

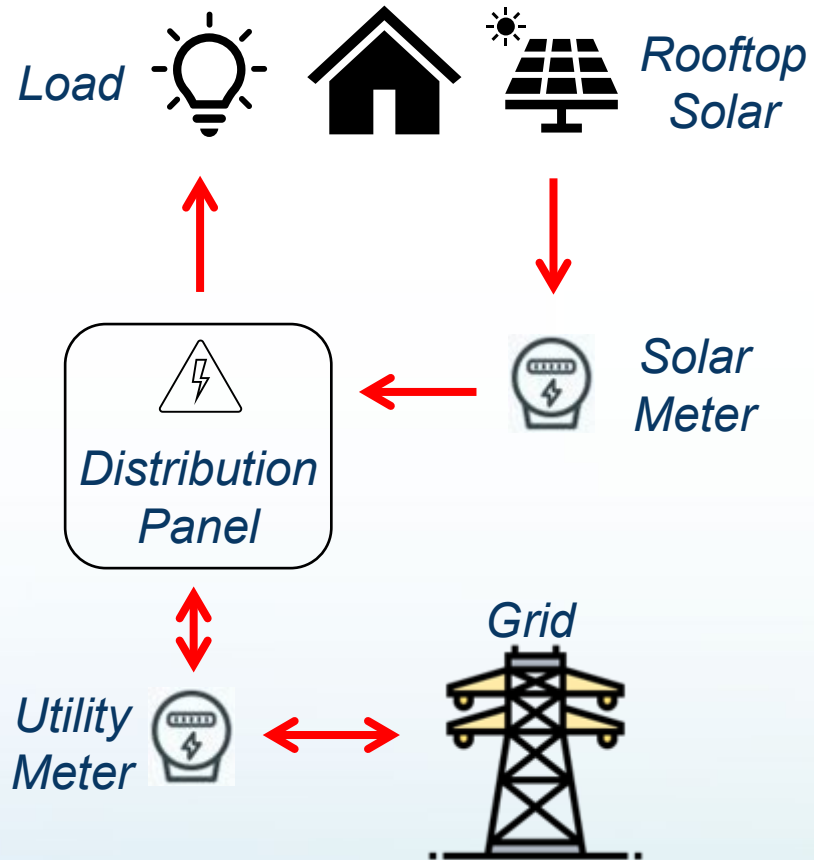
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Each individual facility meets RPS eligibility requirements

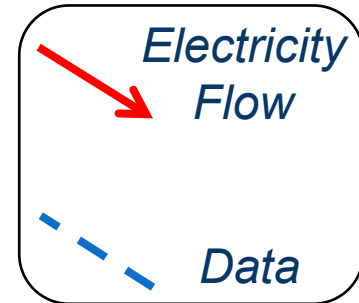
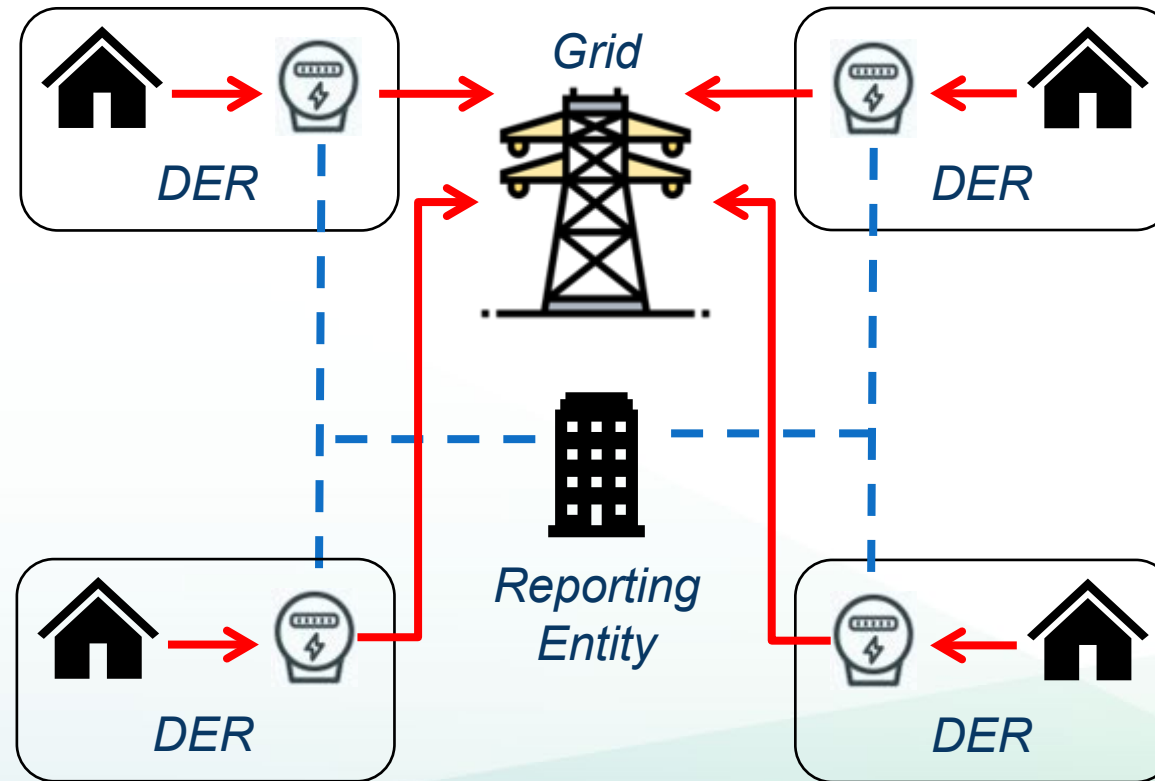


# Example Group

## Individual Facility / DER



## Overall Group





# Participation (1/3)

## Distributed Generation in California

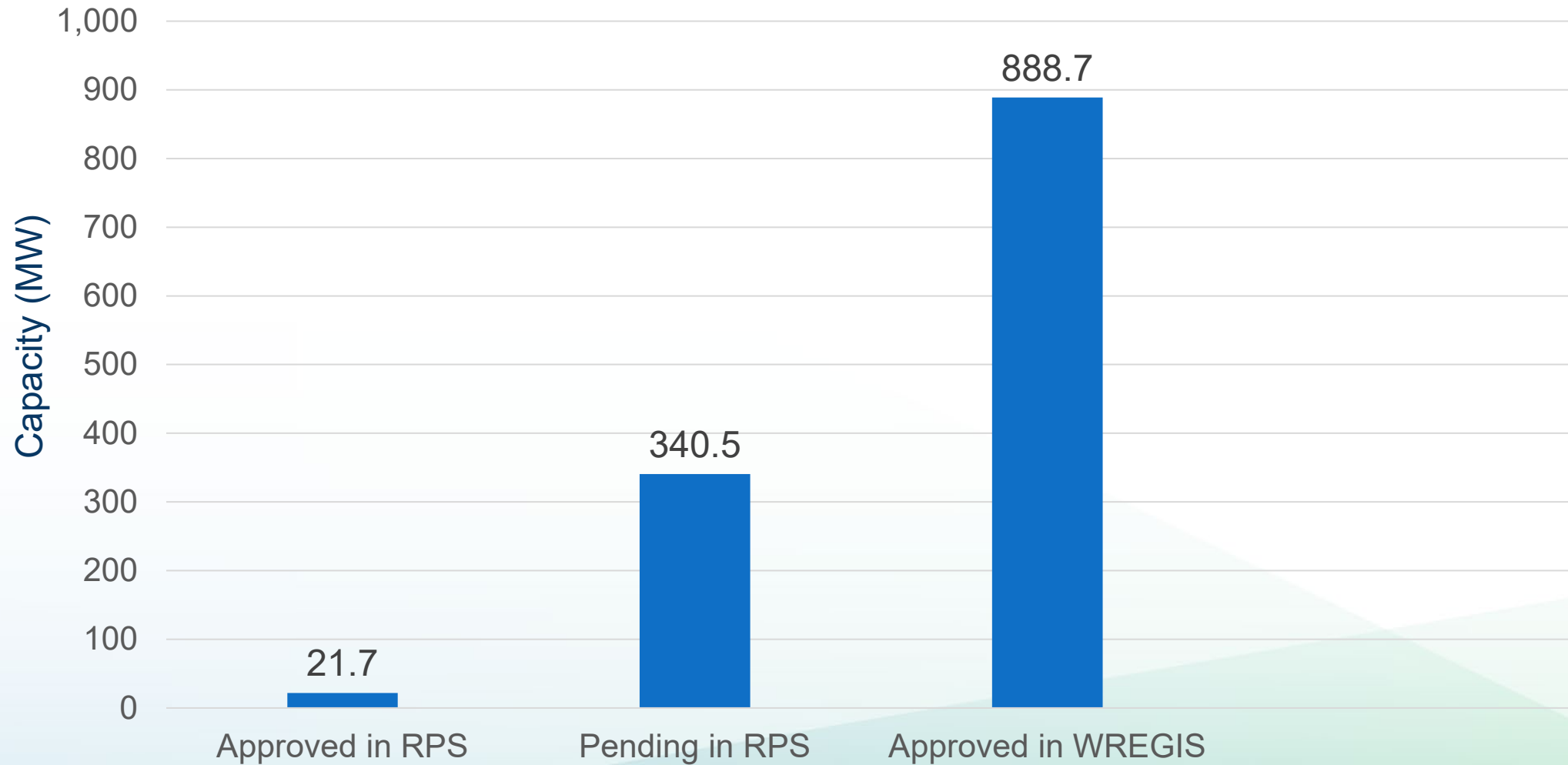


*\*As of Jan. 2025*



# Participation (2/3)

## Distributed Generation in California

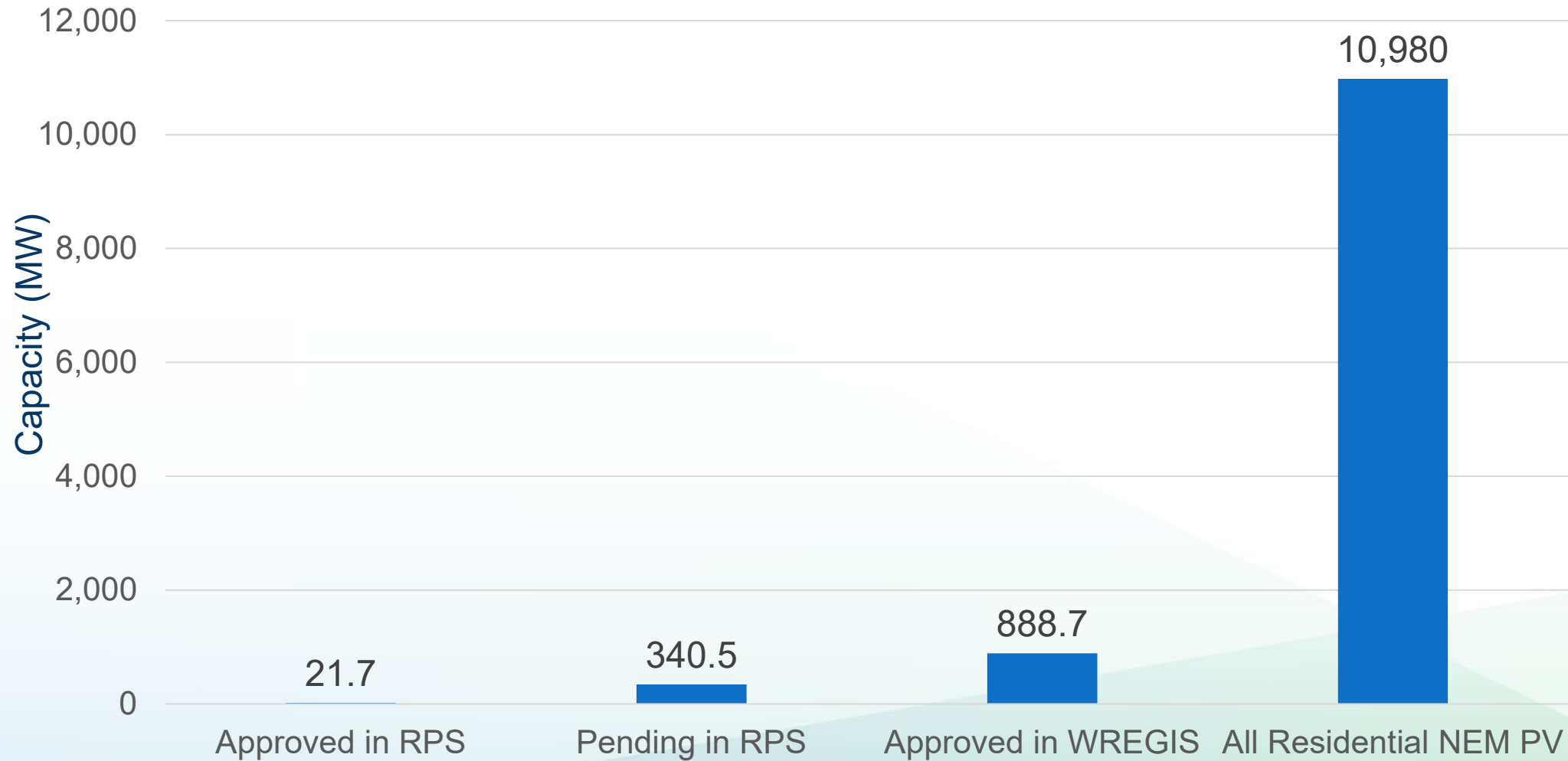


*\*As of Jan. 2025*



# Participation (3/3)

## Distributed Generation in California



*\*As of Jan. 2025*



# Proposal Overview

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1. Clarify existing language and requirements
2. Present a bulk application process
3. Add a location requirement for groups





# Proposed Clarifications

- New terminology!
  - Change “aggregated units” to **“distributed generation groups”**
  - Each unit of a group considered DERs
- Clarify allowed participation in incentive programs (e.g. Net Energy Metering)

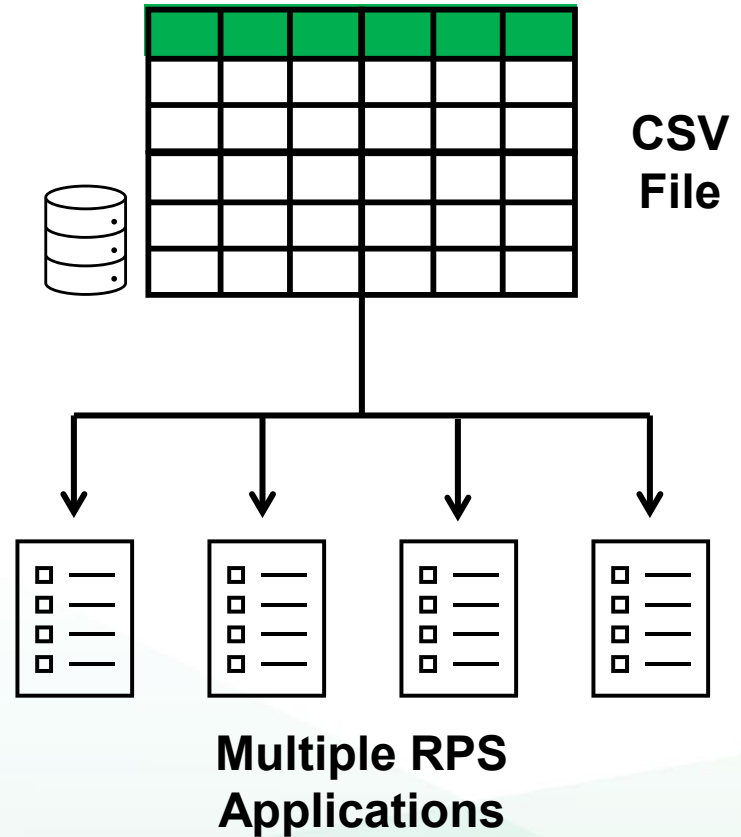


*Source: Energy Commission*



# Proposed Bulk Applications

- Option for a bulk application submission process
  - CSV Import into RPS Online
  - Prepopulates applications for you
  - Data prescreening required
  - Applicant still reviews and attests in RPS Online
- Process is subject to change
- Applicants may use either bulk or standard process

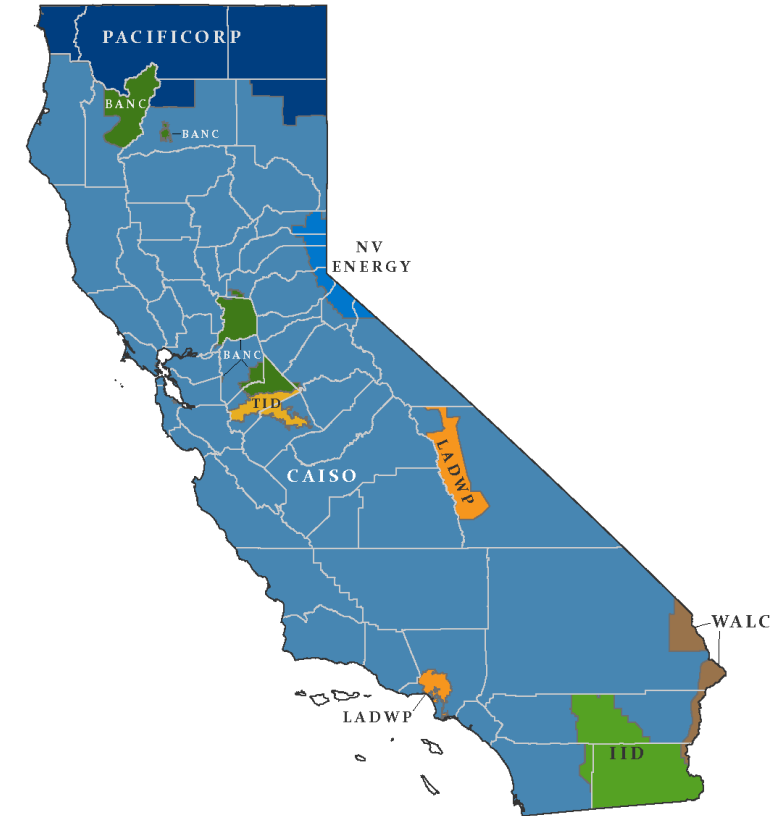




# Proposed Location Requirements

- Entire group interconnects to same balancing authority (BA)
  - Streamlines data for applications
  - Aligns requirements with other application types
- Can still have DG in different California BAs, but separate applications per BA

Balancing Authority Areas  
California, 2020



*Source: Energy Commission*



# Public Comment / Questions

## Instruction

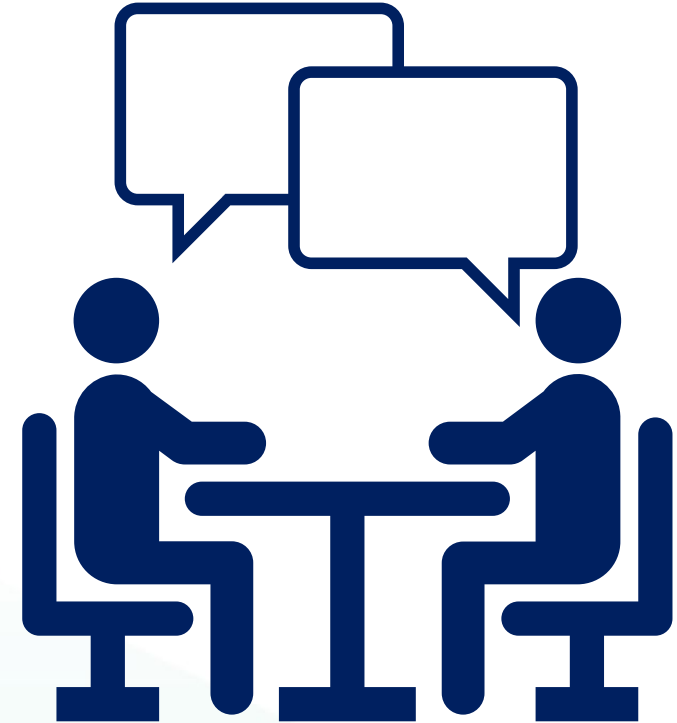
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# **Item 7: Facilities with Air Permits**



# Emissions in the RPS program

## Senate Bill (SB) 100

- 100% RPS-eligible and zero-carbon resources by 2045
  - Supply CA's electric retail sales

## Renewables Portfolio Standard

- Allows emissions under very specific circumstances
- Evolving technologies call for consideration of impact to air quality



*Source: Energy Commission*





# Program Goals

## PUC 399.11(b)

- Achieving the renewables portfolio standard through the procurement of various electricity products from eligible renewable energy resources is intended to provide unique benefits to California, including all of the following, each of which independently justifies the program:
  - ...
  - (3) Reducing air pollution, particularly criteria pollutant emissions and toxic air contaminants, in the state.
  - (4) Meeting the state's climate change goals by reducing emissions of greenhouse gases associated with electrical generation.



# Current Requirements

- Municipal Solid Waste Conversion
  - Must not produce air contaminants or emissions
- Biomethane
  - New contracts must demonstrate environmental benefit to state
- Out-of-state facilities
  - Must not violate California LORS



*Source: Energy Commission*





# Proposal

Ensure RPS facilities are providing intended benefits to California:

1. Facilities subject to CAA Title V permitting to provide emissions documentation
  - (existing documentation)
  - New facilities provide docs at time of application
  - Existing facilities provide docs upon request
2. Noncompliance with environmental regulations may cause certification suspensions



# Questions

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1. Are facilities able to provide emissions documentation at the time of application for Certification (upon Commercial Operations or within 180 days of Commercial Operations Date)?



# Public Comment / Questions

## Instruction

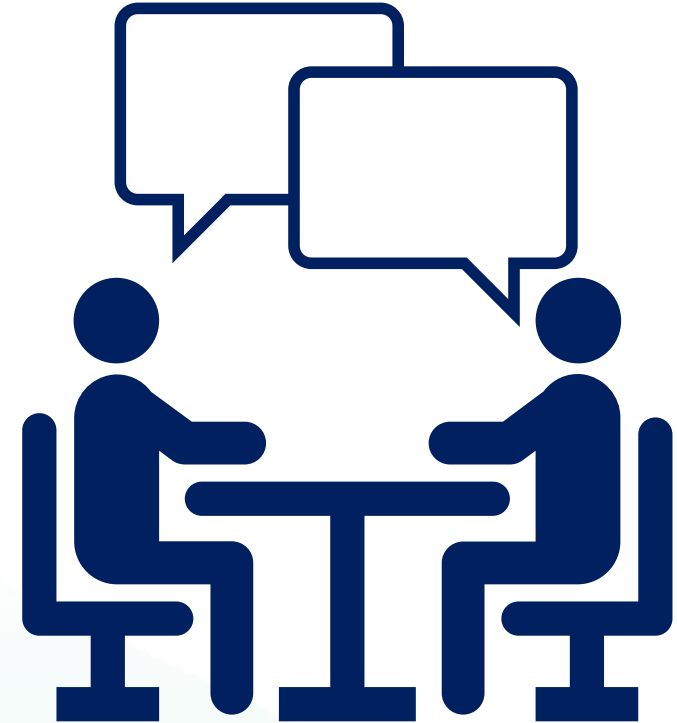
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# **Item 8: Biomethane Delivery**



# Delivery Requirements

AB 2196 (2012)

- Re-instated RPS-eligibility of biomethane
- Established delivery requirements for biomethane procurement contracts

## Existing Contracts

Facility must contract from injection point to final delivery point

Delivery can be with or against physical flow in pipeline

Final delivery point must be RPS facility

If facility is in CA, final delivery point can be:

- CA border
- Any other point in CA

## New Contracts

Facility must contract from injection point to final delivery point

Pipelines must physically flow from injection to delivery point majority of time on annual basis

Final delivery point must be RPS facility

If facility is in CA, delivery satisfied if gas is injected into CA pipeline



# Cause for Revision

## Public Utilities Code Section 399.12.6

- (3) The biomethane is delivered to a generating facility through a common carrier pipeline and meets all of the following requirements:
- (A) The source of biomethane injects the biomethane into a common carrier pipeline that physically flows within California or toward the generating facility for which the biomethane was procured under the original contract.

## RPS Eligibility Guidebook

- 3) The final delivery point of the biomethane must be the generation facility with the following exceptions:
- a) New Biomethane Procurement Contracts: The delivery requirements are satisfied if the facility is within California and receives biomethane from a biomethane production site that injects the biomethane into a common carrier pipeline that physically flows within California.



# Proposal

Clarify language for delivery requirements

Delivery requirements for in-state facilities met if contracting gas injected within CA

- No physical flow requirement from injection point to facility



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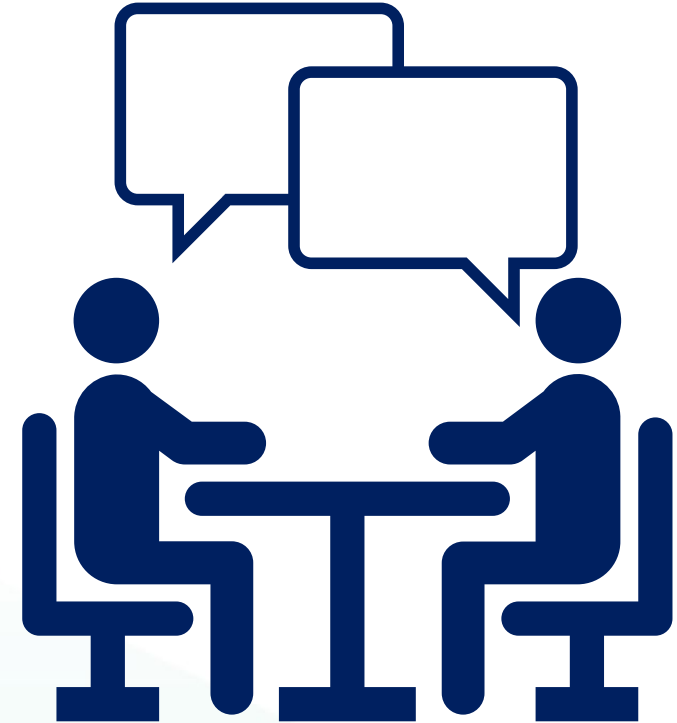
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# **Item 9: Linear Generators and Fuel Cells**



# Linear Generator Overview

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Linear generators are a recent development in electricity generation

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Compression/expansion of reacted gases results in linear motion

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Linear motion creates dispatchable electricity

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Fuel flexible: biomethane, hydrogen, natural gas, etc.

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# Current Requirements

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Linear generators are not listed as an eligible renewable energy resource

Fuel cells are RPS-eligible if utilizing an RPS-eligible fuel



# Cause for Revision

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- AB 1921 (Papan, 2024) went into effect January 2025
  - Adds linear generators using RPS-eligible fuels as an RPS-eligible resource
- Public Resources Code Section 25741(a)(1): “The facility uses...fuel cells or **linear generators using fuels described in this paragraph that otherwise meet the requirements of this subdivision...**and any additions or enhancements to the facility using that technology.”



# Proposal

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Add linear generators as an RPS-eligible resource

Linear generators will have same fuel eligibility requirements as fuel cells

Possible registration restrictions/requirements due to fuel flexibility

Fuel cell eligibility requirements to remain unchanged from 9<sup>th</sup> Edition



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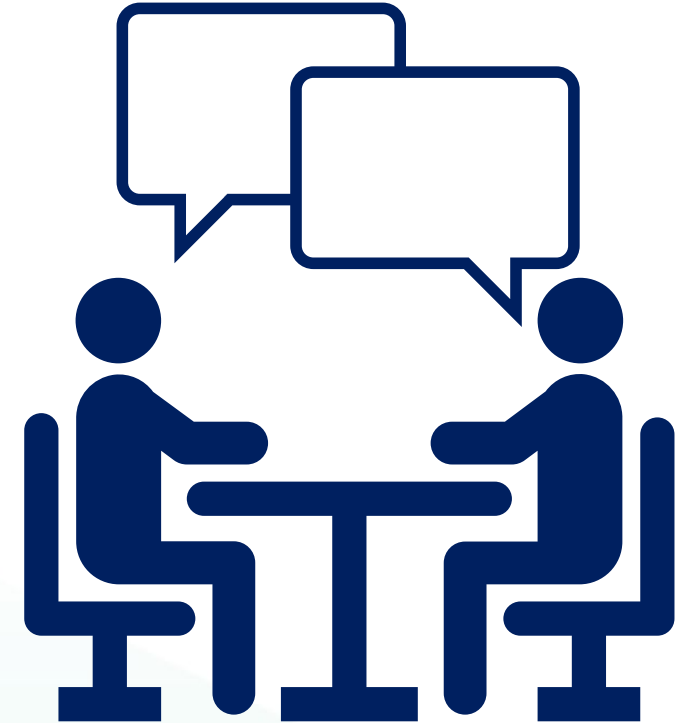
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# Other Issues Raised



# Other Issues Raised

New or expanded resource eligibility

Resources delivering to CAISO load via Subscriber Participating Transmission Owner tariff

Alternative metering requirements

Affirming no double counting





# Next Steps



# Tentative Schedule

| Milestone  | Anticipated Date |
|--|------------------|
| Written Comments Due                                 | June 5, 2025     |
| Post Draft 10 <sup>th</sup> ed RPS Guidebook         | Late-July 2025   |
| Workshop on Draft Guidebook                          | Mid-Aug 2025     |
| Written Comments Period                              | Late-Aug 2025    |
| Post Revised Draft 10 <sup>th</sup> ed RPS Guidebook | Early-Oct 2025   |
| Written Comments Period                              | Early-Oct 2025   |
| Final RPS Guidebook to Business Meeting              | Early Dec 2025   |



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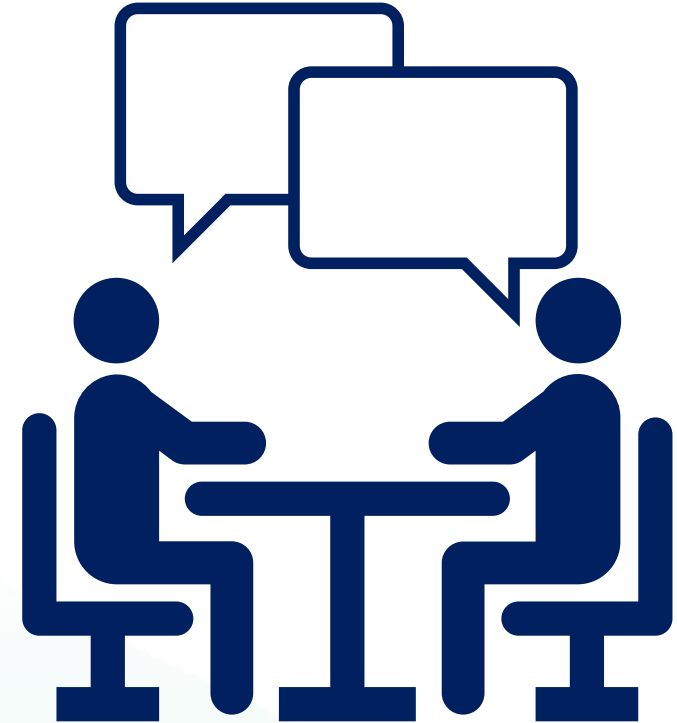
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# Thank You!

Web: [Renewables Portfolio Standard – RPS](#)  
Docket Log: [21-RPS-02](#)

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