

STATE OF CALIFORNIA - THE RESOURCES AGENCY  
BEFORE THE  
CALIFORNIA ENERGY COMMISSION (CEC)

In the matter of, )  
Implementation of Renewables ) Docket No. 03-RPS-1078 &  
Portfolio Standard ) 11-RPS-01 RPS Proceeding  
Legislation ) Docket No. 02-REN-1038  
and ) Renewable Energy Program  
Implementation of Renewables )  
Investment Plan Legislation )

11-RPS-01  
California Energy Commission  
**DOCKETED**  
03-RPS-1078  
02-REN-1038  
TN # <sup>2889</sup>2890 <sup>2891</sup>2892  
October 9 2012

**WORKSHOP**  
**Re: 2008-2010 RPS Procurement**  
**Verification and Proposed**  
**SB X 1-2 RPS Verification**

California Energy Commission  
Hearing Room A  
1516 9th Street  
Sacramento, California

Friday, September 21, 2012  
9:10 A.M.

 **ORIGINAL**

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Brian McCullough

Also Present (\* Via WebEx)

Public Comment

Valerie Winn, PG&E  
\*Tom Roth, SCPPA  
Michael Webster, LADWP  
\*Barry Dong, LADWP  
Bill Westerfield, SMUD

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## P R O C E E D I N G S

1  
2 SEPTEMBER 21, 2012

9:10 A.M.

3 MS. ZOCSETTI: So, good morning everyone. I'm  
4 Kate Zocchetti, I'm the lead for the Renewables Portfolio  
5 Standards here at the California Energy Commission

6 I'd like to welcome you to the Commission on  
7 this fine, fall day.

8 We have folks participating here in the  
9 audience. We have a reporter here that will be doing a  
10 transcript for us, for the first part of our  
11 presentation, and we also have WebEx, and folks can call  
12 in as well.

13 So, just to give you a little brief overview and  
14 then I'm going to turn it over to staff. First, I'd  
15 like to give you some housekeeping notes that, in the  
16 case of an emergency, please follow staff. We'll be  
17 going outside, across the street to the park kiddie  
18 corner to the Energy Commission, until the all-clear  
19 sign. Hopefully, that won't be an issue this morning.

20 We have restrooms located right outside this  
21 room, across the hall. And on the second story -- the  
22 second floor there is a coffee room with sandwiches and  
23 snacks.

24 What we plan to do, we sort of have three parts  
25 to today's workshop. First, we're going to have an

1 overview of the Energy Commission's RPS Procurement  
2 Verification process. Then we'll have some public  
3 comments.

4           And then we're going to give you an overview of  
5 a draft summary of the Retail Sellers' Procurement  
6 claims for the years 2008 through 2010.

7           Again, we'll have comments on those issues.

8           If we finish that early enough, maybe we'll have  
9 a break and move into the second or the third part of  
10 our presentation, our workshop which is talking about  
11 what staff is thinking about for verifying procurement  
12 for the retail sellers and the publicly-owned electric  
13 utilities for the years 2011 and thereafter under Senate  
14 Bill X1-2.

15           If we go a little bit longer this morning, then  
16 we'll just have a lunch break and then proceed with the  
17 third part in the afternoon.

18           Of course, we'll have public comments then and  
19 then there will be an opportunity for written comments,  
20 as well.

21           Let's see, okay, I already went over  
22 housekeeping. There are handouts there. I should  
23 mention that if you want to speak here, in the Energy  
24 Commission, Conference Room A, you should grab a blue  
25 card at the front desk there, and fill it out, and give

1 it to staff and then we'll call you up to the podium.

2 Please make sure that you state your name before  
3 you speak, for the court reporter, and he would  
4 appreciate it if you would give him a business card so  
5 that he spells your name correctly in the transcript.

6 I'm getting ahead of myself. Is someone -- was  
7 there someone speaking? We'd like to go ahead and mute  
8 the phone lines for now.

9 During the public comment period we will unmute  
10 the phone lines.

11 If you are participating on WebEx, you can view  
12 the slides on your computer. You can raise your hand  
13 with the little raise hand function, and we can take  
14 your question verbally or you can type it into the chat.  
15 And we have someone here monitoring your comments and  
16 questions, and we would be happy to address those at the  
17 comment period.

18 As I mentioned, the WebEx users and the phone  
19 users will be unmuted during the public comment period.

20 And if you are listening in and you want to find  
21 out how to get online, please follow our workshop notice  
22 instructions.

23 During the public comment periods we will take  
24 comments, first, from the folks here in person at the  
25 Energy Commission, followed by the WebEx participants

1 and then the phone-in participants.

2 So, I'd like to introduce the staff here today.

3 I'll be sitting right there and to my immediate left is  
4 Gabe Herrera, with our Legal Office, Gina Barkalow, who  
5 leads the verification process and James Haile who works  
6 on the verification.

7 And working the WebEx here is Brian McCullough.

8 We have other staff in the audience, too, who  
9 worked on the publicly-owned utility regulations and so  
10 they're here to answer questions, as well.

11 And so I'd like to have Gina come up and she can  
12 give you her presentation.

13 MS. BARKALOW: Hi everyone, thank you for coming  
14 today. My name's Gina Barkalow and I am the lead for  
15 the RPS Procurement Verification.

16 This slide is just a general outline of what I'm  
17 going to cover this morning. There's a lot to talk  
18 about today, so this presentation is designed to give a  
19 high level overview of the Energy Commission's role in  
20 regards to the California Renewable Portfolio Standard.

21 Theresa Daniels, as Kate mentioned, will be  
22 giving a presentation going into the details of our  
23 verification process and the results, and while I'm more  
24 focused here on discussing the main issues that have  
25 been identified.

1 Under the Renewable Portfolio Standard the  
2 Energy Commission is charged with certifying eligible  
3 renewable energy resources, designing and implementing  
4 an accounting system to verify Renewable Portfolio  
5 Standard Procurement, or RPS, establishing a system that  
6 protects against double counting of the same renewable  
7 energy credit, and developing and implementing RPS  
8 regulations for the POUs.

9 RPS Procurement Verification Reports through  
10 2010 present the amount of RPS-eligible energy procured  
11 and reported by electric retail sellers toward meeting  
12 California's RPS.

13 Staff is currently verifying years 2008 through  
14 '10, and we expect to have a draft verification report  
15 by the end of this year and a final within the first  
16 quarter of next year.

17 For 2011 and forward, staff anticipates  
18 Compliance Period Verification Reports, one for retail  
19 sellers and one for POUs, and I'll be talking more about  
20 this later today.

21 The Energy Commission was mandated to develop a  
22 system based on independently audited data to protect  
23 against double counting. Until WREGIS was operational,  
24 the Energy Commission relies on an interim tracking  
25 system, but it has inherent limitations. And they're



1 listed here on this slide.

2           So, WREGIS stands for the Western Renewable  
3 Energy Generation Information System. WREGIS tracks  
4 renewable generation to help ensure the credibility of  
5 the green value of renewable electricity.

6           WREGIS is a voluntary, independent renewable  
7 energy registry and tracking system for the Western  
8 Interconnection Transmission area. This includes 14  
9 Western States, two Canadian Provinces, and a portion of  
10 Northern Baja, Mexico.

11           WREGIS was launched in 2007. Retail sellers,  
12 POUs, renewable facilities and third parties  
13 participation in California's RPS are required to  
14 register with, and use WREGIS. Generation is reported  
15 by qualifying reporting entities, QREs.

16           The results, as of September 12th, show that  
17 there are more than 537 companies and 2,600 generators  
18 approved to be WREGIS account holders.

19           So, retail sellers began transitioning to WREGIS  
20 starting in 2008. And by 2010 almost all procurement  
21 claims were made using WREGIS.

22           WREGIS certificates are created for every one  
23 megawatt hour of generation, so there may be kilowatt  
24 hours from one year that do not make it into a  
25 certificate until the next calendar year.

1           With the interim tracking system, procurement  
2 was reported in kilowatt hours, but with WREGIS it's  
3 reported in megawatt hours through certificates.

4           For most retail sellers we saw a clean break.  
5 The interim tracking system was used January through  
6 April and then by May most all claims were made using  
7 WREGIS.

8           In cases where the facility was in WREGIS, but  
9 the retail seller did not believe the full generation  
10 amount was to be represented in WREGIS, the interim  
11 tracking system was allowed only after intense  
12 scrutinizing of the interim tracking system claim.

13           This included a three-year analysis of  
14 procurement and generation amounts to make sure the  
15 amount claimed was below the generation amount. So, we  
16 were really concerned for not allowing for double  
17 counting and during this transition period it's really  
18 important that just because something is reported on the  
19 interim tracking system, we wanted to make sure it  
20 wasn't eventually -- those kilowatt hours weren't  
21 eventually wrapped up into megawatt hours later on.

22           And so this three-year analysis looked at the  
23 total amount of procurement for those three years, and  
24 summed it up, and then summed up the generation from the  
25 facility for the three years, and compared if there was

1 an over claim or not.

2           So, this process was very timely and burdensome,  
3 and in most cases the claims ended up not being accepted  
4 and removed.

5           So, if there are any POUs in the audience, this  
6 is just sort of a lessons learned that once it gets into  
7 WREGIS it's, you know, always important to pay attention  
8 to what happens in WREGIS, but counting this little  
9 kilowatt hours is really, really, really burdensome and  
10 time consuming, so I just caution you there.

11           In 2009 and '10 there were a few RPS track  
12 claims that were accepted, but documentation was  
13 required from either WREGIS or the facility stating that  
14 the WREGIS certificates were not available.

15           And in some cases we had initial claims on the  
16 RPS track form and then when the retail seller went to  
17 go get this documentation from WREGIS, it turned out  
18 that there were WREGIS certificates there.

19           And so this was a good double check to make and  
20 I think it was worthwhile.

21           All right, now I'm just going to jump right to  
22 the issues for 2008 through '10. There are three of  
23 them. the first one is verification of procurement date  
24 relative to the vintage of the renewable energy product.

25           The second one is verification of biomethane-

1 related claims. This is just for years 2008 through  
2 '10, and then generation of energy delivery for out-of-  
3 state facilities.

4 This first issue is worth mentioning, but we  
5 don't have any pending or ineligible claims as a result.  
6 It's just things are changing in the RPS world, as I'm  
7 sure you all know.

8 The California Public Utilities Commission, the  
9 CPUC, decisions regarding TRECS and Senate Bill X1-2 now  
10 allow for procurement from one year to be applied to a  
11 later year or compliance period.

12 But procurement from contracts executed after  
13 2010 may not be used for compliance in years during the  
14 2008 -- or through 2010 reporting period.

15 So, for example, 2009 vintage certificates  
16 procured under a 2011 contract may not be used for  
17 compliance until the first compliance period.

18 This point is to really just put people on  
19 notice that while we're providing preliminary  
20 verification data results here, if we later learn that a  
21 claim was made during the 2008 through 2010 time frame,  
22 but the amounts were actually procured after 2010, we  
23 will need to make adjustments accordingly.

24 This is to really clarify in case anyone was not  
25 aware, or if they were unclear on this, that the bright

1 line for when procurement claims can be made is the  
2 procurement contract date, unless there was a special  
3 circumstance approved by the CPUC.

4 So, entities cannot make a purchase in 2011 and  
5 report it as if it was procured before then, as this  
6 would be falsely inflating their RPS progress.

7 So, in the earlier years of the RPS program we  
8 did not have the situation where procurement from one  
9 year could be reported in a later year. It was always  
10 the amount of procurement for a given year that was  
11 reported for the same reporting year.

12 So, this is just to say if you need to do any  
13 double checks on what was reported to us, please go  
14 ahead and do that, and let us know if there is anything  
15 that needs to be changed.

16 Everyone is really anxious to close the books on  
17 these years and just move forward, and we would really  
18 hate to do that and then later find out that we need to  
19 make a change.

20 So, we're aware that the CPUC is reviewing the  
21 ES -- some of the ESP contracts, so if anything comes up  
22 as a result of that, we'll know.

23 But in terms of verification, this is a  
24 difficult check for us to make because we don't normally  
25 see the contracts unless there's a red flag for any

1 particular reason.

2           So, it's really incumbent upon the retail  
3 sellers to report correctly.

4           Verification of procurement under SBX1-2 will  
5 require much more contract checking and I would expect  
6 this sort of concern to pretty much go away because we  
7 will be doing a lot of contract checks. So, it's just  
8 in these years here that it's a little bit difficult for  
9 us.

10           There are some cases where a WREGIS certificate  
11 has a vintage year different than the reporting year and  
12 this situation occurs when WREGIS certificates were  
13 created for more than there was generation.

14           And in order to correct this excess amount of  
15 WREGIS, the QRE needs to reload the adjustment amounts  
16 in WREGIS.

17           Adjustment amounts are written into the database  
18 and any increases or decreases will be applied to the  
19 next available WREGIS generation period.

20           So, for example, say 110 WREGIS certificates are  
21 created with a December 2009 vintage, but after the  
22 prior period adjustments are made it's realized that,  
23 really, only 100 WREGIS certificates should have been  
24 created. So, there are ten excess December 2009 vintage  
25 certificates that then would need to be used with the

1 January 2010 vintage.

2           And this is really just to let folks know a  
3 little bit more about how things are working in WREGIS.  
4 And staff needs to understand when this is happening to  
5 determine if we need to analyze the amounts differently,  
6 as I'll get to in the next slide.

7           So, staff identified 2008 and 2009 vintage year  
8 certificate claims reported for 2010. And while this  
9 reporting strategy does not appear to violate any  
10 specific RPS requirements, it does complicate  
11 verification.

12           So, for example, 2008 year vintage certificates  
13 for claims reported for 2010 cause over claims for 2010  
14 that can only be resolved by removing the 2008 vintage  
15 amount from staff's analysis.

16           So, it's maybe a little bit hard to understand,  
17 but the way that we look at our procurement claims is on  
18 an annual basis.

19           And so what is happening is these 2008 amounts  
20 are showing up with 2010, so it's blowing up the amount  
21 of procurement, as we see it, for 2008. So, it looks  
22 like a lot more was procurement than was generated, and  
23 that raises a flag for us.

24           So, what we had to do was remove the 2008  
25 vintage amounts, put it back into 2008, make sure there

1 were no over claims in 2008, and make sure there were no  
2 over claims in 2010, and then we were able to add it  
3 back in.

4           So, it's just a complication. It adds time and  
5 effort to our process. And our internal database is  
6 currently not set up to handle this sort of analysis.

7           We are hoping to get a more sophisticated  
8 verification system in the future because these sort of  
9 situations will probably be happening more often.

10           And, hopefully, that will help us automate these  
11 sort of checks in the future so that we can check  
12 vintage and generation amounts that may occur over  
13 multiple years.

14           So, basically, in these three cases when it was  
15 a contract date that was after 2010, the retail seller  
16 was required to remove the claim.

17           In cases where the reason for the vintage  
18 reporting mismatch was a WREGIS functionality, staff  
19 accepted the claims.

20           And in cases where vintage year and reporting  
21 year did not match staff -- if staff was able to verify  
22 that there was no double counting, then staff accepted  
23 the claims.

24           So, as I mentioned before, if we become aware of  
25 additional cases where procurement was claimed for an



1 incorrect reporting year, staff will work with the  
2 retail sellers to correct the situations and we'll  
3 document the outstanding issues in the RPS Procurement  
4 Verification Report, as appropriate.

5 So, the second topic we have is Verification of  
6 the 2008 through 2010 Biomethane Claims.

7 Listed on this slide are the requirements that  
8 have been listed from the third edition through the  
9 sixth. I'm just going to read here that, first, the gas  
10 must be produced from an RPS-eligible resource, such as  
11 biomass or digester gas.

12 Two, the gas must be injected into a natural gas  
13 pipeline system that is either within the WECC region or  
14 interconnected to a natural gas pipeline system.

15 In the WECC region, that delivers gas into  
16 California.

17 Three, the energy content produced and supplied  
18 to the transportation pipeline system must be measured  
19 on a monthly basis and reported annually, illustrated by  
20 month.

21 Reporting must be in units of energy, for  
22 example MMBtu, based on metering of gas volume and  
23 adjustment for measured heat content per volume of each  
24 gas.

25 In addition, the total amount of gas used at the

1 RPS-eligible facility must be reported in the same units  
2 measured over the same period and the electricity  
3 production must be reported in megawatt hours.

4 Four, the gas must be used at a facility that  
5 has been certified as RPS eligible. As part of the  
6 application for certification, the applicant must attest  
7 that the RPS-eligible gas will be nominated to that  
8 facility or nominated to the LSE-owned pipeline serving  
9 the designated facility.

10 And what I just read was taken from the third  
11 edition of the guidebook.

12 The two types of documentation for biomethane  
13 verification include physical and contractual data.

14 Physical data is about the physical delivery and  
15 use of the gas and it needs to come from both the source  
16 and the RPS facility.

17 Contractual data is proof of purchase of the gas  
18 and proof showing an arrangement ahead of time to have  
19 the gas delivered to California was made.

20 So, I'll talk a little bit about both of these  
21 requirements.

22 Date required for physical verification at the  
23 biomethane source are monthly metered data reported  
24 annually for the amount of biomethane injected into the  
25 pipeline.

1           The meter data can show the amount of biomethane  
2 in two ways. The first is to show both the monthly  
3 volume and the monthly average heat content, which we  
4 would then use to calculate the total energy of the gas  
5 injected each month. Or, the meter data can show the  
6 monthly total energy of the biomethane injected into the  
7 pipeline.

8           Invoices cannot be substituted for meter data.

9           Physical verification requirements for use at  
10 the RPS-certified facility; here we also require monthly  
11 meter data reported annually, showing the amount of  
12 total pipeline gas consumed at the facility.

13           And just to clarify, we are looking here for the  
14 monthly total gas removed from the pipeline by the RPS-  
15 certified facility. So, there's sort of two things  
16 here, the meter data, but also the total amount of  
17 electricity produced by the facility.

18           And again, invoices cannot be substituted for  
19 meter data.

20           We need the invoices to show that the facility  
21 did purchase the biomethane. We also compare the total  
22 amounts on the invoices to the total amount injected to  
23 verify that they match up. And if there is a  
24 difference, we take the lesser of the two.

25           So, for example, the biomethane might inject

1 more than is purchased, but the facility only gets  
2 credit for what was purchased.

3           Also, the facility might buy more than what is  
4 injected and would just then get to count the amount  
5 injected, unless the facility used stored biomethane and  
6 then additional documentation would be required.

7           So, in some cases there could be multiple  
8 sources and then the required -- all of this data is  
9 required, the same documentation is required for each  
10 source.

11           This slide here shows the status of the pending  
12 biomethane claims. This is the first time we've really  
13 had to verify biomethane claims, so it has been a  
14 learning process for us. And these claims have actually  
15 served as very good case studies.

16           So, the Xs here indicated that sufficient  
17 documentation has not yet been received, and the  
18 checkmarks indicate appropriate or complete  
19 documentation has been provided.

20           The table does not indicate that a claim has  
21 been verified as eligible or ineligible. All of the  
22 claims are pending because we still don't have the data  
23 points we need to complete the verification.

24           So again, the physical requirements include  
25 meter data, and for the RPS-certified facility it also

1 includes generation data.

2           PG&E has provided some documentation and we are  
3 continuing to work with them to complete the  
4 verification. There are two sources of biomethane for  
5 PG&E's claims, so this adds to the amount of data  
6 requirement for verification purposes.

7           And the Pastoria facility used stored  
8 biomethane, so we are working with the retail sellers to  
9 get sufficient documentation regarding storage.

10           So, there's still work to be done before we can  
11 make a determination of the eligibility of these claims.  
12 the results of our analysis will be included in the  
13 draft Verification Report.

14           It just gets a bit more complicated when there's  
15 multiple sources or when there is stored biomethane, and  
16 we just happen to have both of those situations in these  
17 claims here.

18           The next issue is on energy delivery. The RPS  
19 Eligibility Guidebook requires that a matching quantity  
20 of electricity must be delivered to an in-state point of  
21 delivery consistent with the North American Electrical  
22 Reliability Corporation, or NERC, rules and documented  
23 with a NERC e-Tag.

24           So, I do realize that this is changed and now  
25 it's being done by NASB, and we have the OATI web

1 registry. And so maybe at some point we will update it  
2 to just say e-Tags, instead of NERC e-Tags. But for now  
3 we're using NERC e-Tags.

4           And the RPS Eligibility Guidebook requires the  
5 RPS ID on the e-Tags to demonstrate that a matching  
6 amount of substitute energy was delivered into  
7 California for the RPS-certified facility.

8           The RPS Eligibility Guidebook states that the  
9 annual report to verify delivery must include the source  
10 point located out of California, and that is for the  
11 substitute energy, the final point of delivery, the POD,  
12 which is also the sink, and the RPS ID of the certified  
13 facility or facilities with which the delivered energy  
14 is being matched.

15           The California RPS ID must be shown on the  
16 miscellaneous field of the NERC e-Tag, the amount of the  
17 electricity delivered per month and annually.

18           So, because the tracking services using NERC e-  
19 Tags was not available in WREGIS in 2009, retail sellers  
20 reported using this interim tracking delivery form for  
21 2008.

22           NERC e-Tags in WREGIS are created -- or e-Tags  
23 are created when energy is scheduled to cross a  
24 balancing authority area and they're used to track the  
25 physical path.

1           E-Tags are pulled into WREGIS if the RPS ID is  
2 on the miscellaneous token field line of the physical  
3 path of the e-Tag.

4           In WREGIS account holders can match e-Tags to  
5 the corresponding WREGIS certificates to show that  
6 energy was delivered to California.

7           Retail sellers submit NERC e-Tag summary  
8 reports, along with the WREGIS compliance reports, which  
9 provide verification information included on the e-Tags.

10          So, this is the information that is provided to  
11 us on the WREGIS NERC e-Tag summary report. The  
12 generator name is the source, or the POR, and the load  
13 is the sink, or the POD, and the load-serving entity is  
14 the PSE.

15          This is the interim -- the information that is  
16 available to us on the Interim Tracking Delivery Form.  
17 So, there's two schedules. The first one includes  
18 various IDs, the POR and the POD. And then the second  
19 one includes the monthly and annual amount.

20          So, there were some cases in 2009 and '10 where  
21 retail sellers were allowed to report using the delivery  
22 form, and so we did see that in 2009 and '10, as well.

23          So, the situations that we identified through  
24 the verification process, so while we received the  
25 summary report from WREGIS, and also the delivery form

1 for the ITS reporting, that does not include the NERC e-  
2 Tags. And so to avoid having to look at every single  
3 NERC e-Tag that was generated, we just asked for random  
4 samples.

5 And during this process we found that some of  
6 the NERC e-Tags did not include the RPS ID number in the  
7 miscellaneous field, but it was in the comments section  
8 of the NERC ID.

9 So, when we asked why this occurred, their  
10 justification was that in the second edition of the RPS  
11 Eligibility Guidebook the requirement was to have the  
12 NERC ID in the comments section.

13 And so, basically, I think the argument here was  
14 there was a transition time. So, the third edition of  
15 the RPS Eligibility Guidebook came out in January 2008,  
16 and so that's what we have here.

17 There were other cases where there was just no  
18 RPS ID on the e-Tag, and the reasons for that are listed  
19 here.

20 And so, the claims in these situations are  
21 listed, currently listed as pending, so they have not  
22 been determined to be eligible or ineligible.

23 Staff has been collecting information from the  
24 retail sellers that did not meet this delivery  
25 requirement, and we will determine if claims -- you



1 know, based on this supporting documentation, staff will  
2 determine if the claims can be considered verified.  
3 And, if so, we will include a recommendation in the  
4 draft Verification Report.

5 So, basically, staff does not have the authority  
6 to go against what is in the guidebook. So, in a  
7 situation like this we want to get enough information to  
8 be able to make a recommendation one way or another.

9 It is the full Commission that votes on a  
10 decision like this.

11 So, we can now be open to public comments. Feel  
12 free to comment on any of the issues, now.

13 Theresa also will be giving her presentation and  
14 she'll be going into more detail of the various retail  
15 sellers summary slides, and so it's also possible to  
16 make comments after that presentation.

17 So, it's really up to you. We can wait for blue  
18 cards and give you some time now to see if anybody wants  
19 to comment, or you can hold your comments until later.

20 It looks like we might have a comment.

21 And if you're on WebEx, please send a request to  
22 the coordinator that you would like to ask a question or  
23 make a comment.

24 And Lorraine Gonzales will go around and maybe  
25 look for blue cards, or feel free to bring it up. Okay.

1 MS. WINN: Hi, Valerie Winn with PG&E. I  
2 believe back on slide 9 you talked about as you're doing  
3 more of the verification going forward --

4 MS. BARKALOW: Yes.

5 MS. WINN: -- that you're going to need to do  
6 more contract checks.

7 MS. BARKALOW: Yes.

8 MS. WINN: Could you say a little bit about what  
9 you're going to be looking for? Are you going to be  
10 looking for the contract, are you going to ask people to  
11 simply provide the date of the execution, or approval?  
12 What's that going to look like?

13 MS. BARKALOW: Actually, that's really a  
14 question that's more appropriate for the second portion  
15 of today's workshop.

16 MS. WINN: Okay.

17 MS. BARKALOW: We're going to be talking about  
18 that because it has to do with the role of the CPUC, as  
19 well.

20 MS. WINN: Okay, good, because that goes to my  
21 questions about confidentiality of the contract  
22 information, which was really where I was going.

23 MS. BARKALOW: Okay. Well, I could just tell  
24 you that we really do not want confidential information.  
25 We're not interested in price information. And we'd

1 really appreciate it if all confidential information is  
2 redacted. It makes our life a lot easier, too.

3 MS. WINN: Okay.

4 MS. BARKALOW: So, we usually tend to agree on  
5 how to be able to get the information submitted without  
6 a confidential request.

7 MS. WINN: Okay, thank you.

8 MS. BARKALOW: You're welcome.

9 And it's also possible to provide written  
10 comments, so if you don't feel like speaking right now,  
11 please just go ahead and submit your comments. And the  
12 information is on the notice, and it looks like maybe we  
13 have a question on -- through WebEx.

14 Okay, so Brian is going to write down the  
15 question and I will read it.

16 And folks can maybe start thinking about how we  
17 want to go about the rest of the day. So, after  
18 Theresa's presentation we can take a break. And if it's  
19 still early, then perhaps we can launch into the  
20 presentation or it's possible to break for lunch,  
21 depending on the timing. So, we can think about that  
22 and we'll just maybe probably take a vote or so, try and  
23 get a sense of what people would like to do.

24 MR. ROTH: Gina, I'm calling from WebEx, can you  
25 hear me?

1 MS. BARKALOW: Yes, go ahead.

2 MR. ROTH: Good. Yeah, this is Tom Roth calling  
3 with SCPPA.

4 You state in one of your slides. I didn't get  
5 the number. It was going faster than I could write it  
6 down.

7 MS. BARKALOW: Oh, sorry.

8 MR. ROTH: That the certified facility must show  
9 that it is the purchaser and sole possessor of the  
10 biomethane that's to be consumed for the purpose of  
11 making a qualified RPS product.

12 Certain facilities and, of course, one of which  
13 SCPPA owns and is operated by Burbank, does not purchase  
14 gas for use in the facility. It owns the facility, but  
15 the facility's gas is brought -- and this is the  
16 biomethane. It's brought to the facility by the cities  
17 that participate in the plant.

18 Does this give rise to a conflict with the proof  
19 of physical path, which we can certainly give you that,  
20 but the issue having to do with possession, title, and  
21 all those particular matters? Would you kind of tell me  
22 about that?

23 MS. BARKALOW: I'm going to ask if James Haile  
24 has anything to say, or Kate. I'm not really able to  
25 answer that question right now.

1 MR. ROTH: Okay.

2 MS. BARKALOW: We probably have to think more  
3 about how that would work.

4 Certainly, feel free to provide that question in  
5 writing, too, so we can think about it more.

6 MR. ROTH: Oh, I've made an effort -- okay, I've  
7 made an effort to do that but I'm failing miserable in  
8 the jackpot. So, I can get into it, but it isn't taking  
9 my message.

10 MS. BARKALOW: Oh, I'm sorry.

11 MR. ROTH: Anyway, you have somebody there who  
12 is doing a transcript of this so, hopefully, that  
13 will --

14 MS. BARKALOW: Yes, we will have a transcript.  
15 We will have a transcript of this, yeah, and there will  
16 be a WebEx recording, as well.

17 MS. ZOCSETTI: Tom, this is Kate Zocsetti.  
18 Thank you for your comment.

19 MR. ROTH: Yes.

20 MS. ZOCSETTI: I think probably we'll discuss  
21 plans for future verification processes in the last  
22 section of our workshop today, when we talk about how  
23 we're going to verify RPS claims under SB X 1-2.

24 Hopefully, you're going to be on the line at  
25 that time, and I think probably others will have similar

1 questions, if you don't mind?

2 MR. ROTH: That's good.

3 MS. BARKALOW: Oh, actually, I'm sorry, just to  
4 jump in, I was not actually planning to talk about  
5 verification of biomethane in the afternoon portion.

6 MS. ZOCETTI: That's true.

7 MS. BARKALOW: Just as more of the buckets so,  
8 I'm sorry.

9 MR. HERRERA: Hey, Tom, this is Gabe Herrera  
10 with the Commission's Legal Office. So, this issue is  
11 one that comes up in the context of the AB2196 which, if  
12 the Governor signs that bill, the Energy Commission will  
13 have to revise its guidebook to talk about the rules for  
14 verifying, both the delivery of the biomethane, itself,  
15 as well as the delivery path, and then the attributes.

16 So, that discussion, I think, how we verify the  
17 quantities of biomethane that were procured by SCPA on  
18 behalf of its members I think is a good point to raise  
19 when we start talking about 2196.

20 MR. ROTH: We will raise it then and at any  
21 other point in time that you suggest it's appropriate.  
22 I guess we'd like to get it front of it before, you  
23 know, it gets reported and then a year or two later it  
24 gets questions.

25 MS. ZOCETTI: Sure, understood. Just a

1 reminder to everyone, though, that these morning  
2 presentations are regarding 2008 through 2010 claims.  
3 So, the verification --

4 MR. ROTH: Okay.

5 MS. ZOCETTI: -- processes that were in place  
6 at that time are more of what's coming into play here.

7 MR. ROTH: I'll keep that in mind. Thank you,  
8 Kate.

9 MS. ZOCETTI: Thanks Tom.

10 MR. ROTH: Yeah.

11 MS. BARKALOW: I have a blue card from Michael  
12 Webster, Associate Director of Power System Planning and  
13 Development, LADWP.

14 MR. WEBSTER: Yes, Mike Webster, L.A. Water and  
15 Power.

16 I might reserve this comment, but when you said  
17 you weren't going to talk about biomethane verification,  
18 it is a very important issue to the City of Los Angeles.  
19 And I'll gen it up and maybe we can talk more about it  
20 this afternoon.

21 But we were under our rules at the time, 387  
22 delegated that authority to water and power  
23 commissioners and our city council.

24 And so while we implemented RPS with an eye  
25 towards what was going on in California, what the CEC

1 was doing under Guidebook Number 3, it was not clear to  
2 us that you were going to implement that through  
3 tracking the biomethane all the way through the  
4 pipeline.

5 While we can clearly demonstrate that it is  
6 burned in our facility, some of the tracking mechanisms  
7 that were deployed in historical verification are going  
8 to be very, very hard in the future.

9 So, I'm going to get that up and we'll talk more  
10 about it this afternoon.

11 And I'll just raise one more comment about this  
12 historical verification. We're in 2012 and you're in  
13 the process of wrapping up verification for 2008 to  
14 2010. So, when I think about the future, that's quite a  
15 long delay. And I know it's incredibly complicated, but  
16 if we were to find ourselves short in renewable energy  
17 how do we make up the difference?

18 And I'll just pose that as a question, not  
19 living with your process for all these years, how will  
20 we go back and make sure we comply when maybe two years  
21 later we find out we're deficient for whatever technical  
22 reason? Thank you.

23 MS. BARKALOW: Thanks. I would just sort of say  
24 one of the lessons learned here is that we do require  
25 documentation going back in time, so I would start



1 collecting it now and have it ready and available, so it  
2 makes it a lot easier to get when it's time to present  
3 it.

4 So, it has been hard. PG&E had to go back and  
5 look for 2008 records, and a lot of time had passed  
6 since then, so that's part of the problem in the delay  
7 of getting information.

8 So, now that we know a little bit more, I would  
9 start saving that documentation right away.

10 MS. ZOCETTI: This is Kate Zocetti. I'd also  
11 like to add a reminder that we are not planning to, as  
12 Gina pointed out, really discuss biomethane tracking in  
13 our presentation today regarding what the Energy  
14 Commission is thinking about for 2011 and thereafter,  
15 under SB X 1-2.

16 As Mr. Herrera mentioned, we're also watching  
17 carefully as to whether or not the Governor signs  
18 AB2196. And if he does, we will be charged with  
19 implementing most of that.

20 And so there's a lot that we don't know and  
21 we're trying to get ahead of the game and figure out, if  
22 it is chaptered, how we will address that.

23 And we expect to have a workshop later on this  
24 year to talk about that and other issues that will have  
25 to all be rolled into an RPS Eligibility Guidebook

1 revision process, which we'll have another at least one  
2 opportunity for public participation.

3           So, I just want to assure everyone that today is  
4 looking more at 2008 through 2010. And while we're  
5 having this workshop, we wanted to take the opportunity,  
6 while we have your attention, to also kind of just tee  
7 up our thinking, our current thinking, nothing is in  
8 stone at all, about how we might proceed with verifying  
9 2011 and thereafter.

10           So, the last presentation is more of a  
11 brainstorming, talking with you, and more informal  
12 process. We won't be having the court reporter at that  
13 time.

14           So, I sense people's concerns that we might have  
15 made decisions about how we're going to do things in the  
16 future that, you know, you might not have had a say in,  
17 and that's not the case at all.

18           So, just be watching for future notices about  
19 workshops, or webinars, or things like that as we start  
20 to begin the guidebook revision process. So, thank you.

21           MS. BARKALOW: Okay, hi, so I do have two blue  
22 cards here and I have a Barry Dong on the phone. Barry,  
23 if you'd like to go ahead and speak?

24           MR. DONG: Yeah, this is Barry Dong from L.A.  
25 Water and Power. I have a question on one of the slides

1 you showed that the June for 2010 biomethane contracts  
2 will have to be used as CEC certified facility in order  
3 to count the credits.

4 The thing is, the CEC certification was not  
5 required actually out for the SB X 1-2 is in place.

6 So, our situation applied to out, our facilities  
7 were not certified, even though we submitted  
8 verification out of that. But right now it's still  
9 under pending.

10 I was wondering what those facilities, the  
11 contracts hired 2010, would that biomethane credit would  
12 be counted in those facilities?

13 MS. BARKALOW: Just to clarify, are you asking  
14 about something that was an SB X 1-2 situation?

15 MR. DONG: No, no, our facilities were not SB X  
16 1-2 --

17 MS. BARKALOW: And, I'm sorry, could you speak  
18 up a little bit louder, it's very hard to hear you.

19 MR. DONG: Yeah, our facilities are not  
20 certified, have not been certified, yet, even though we  
21 submitted application and it has been pre-certified, but  
22 it has not been certified.

23 MS. BARKALOW: Okay.

24 MR. DONG: So, what the concern is for those  
25 pre-2010 contracts, biomethane contracts. So, because

1 on one of your slides it's showing that it has to be  
2 used in certified facilities, and our facility has not  
3 been certified. So, we are concerned on how do we count  
4 those credits?

5 MR. HERRERA: Hi. Gina, I'll address that.  
6 This is Gabe Herrera, Mr. Dong.

7 So, this presentation and these requirements are  
8 really focusing on the retail seller requirements, and  
9 so as part of the retail sellers, in order for them to  
10 claim this procurement based on biomethane use, the  
11 facility designated for use of the biomethane needed to  
12 be certified by the Energy Commission.

13 Again, these were retail sellers. Back in 2010  
14 LADWP was under no obligation, obviously, to follow the  
15 Energy Commission's rules. It had its own rules it  
16 adopted pursuant to Public Utility Code Section 387.

17 You know, going forward, starting in 2011, under  
18 Senate Bill X 1-2, the Energy Commission will need to  
19 address the situation of verifying procurement by POUs.  
20 And at that point we'll need to address L.A.'s, you  
21 know, contracts pre-June 2010 contracts.

22 But again, those rules and that discussion, I  
23 think, will need to wait until such time as the Energy  
24 Commission is implementing AB2196. Because if that bill  
25 does get enacted into law there will need to be a number

1 of changes that will be addressed in our guidebook to  
2 address the biomethane procurement issue.

3 MR. DONG: Thank you. Thank you.

4 MS. BARKALOW: Okay, I have a blue card that  
5 came in over WebEx, and the question is from Dana  
6 Griffith.

7 "I own the biomethane production facility.  
8 There will be no invoice showing a purchase. How do we  
9 meet the invoice requirement in that case?"

10 That is a good question. So --

11 MR. HAILE: Hi, James Haile here. So, you're  
12 the biomethane source facility but -- so, you're selling  
13 the biomethane but there's no invoice. I would imagine  
14 there would have to be some sort of proof of sale that  
15 would show the amount of biomethane that was sold by the  
16 source facility to someone.

17 MS. BARKALOW: Do you have any comments, Dana  
18 Griffith?

19 Okay, it's also possible to submit written  
20 comments so I just want to leave it at that.

21 Okay, yes, we have someone from --

22 MR. WESTERFIELD: Yes, I have a blue card. Bill  
23 Westerfield with SMUD --

24 MS. BARKALOW: Can you state your name and  
25 information?

1 MR. WESTERFIELD: Bill Westerfield with SMUD.

2 MS. BARKALOW: Okay.

3 MR. WESTERFIELD: Gabe, you had just made a  
4 comment and I was trying to understand kind of the basis  
5 for your comment. I think you had mentioned that should  
6 2196 be signed by the Governor, then the Energy  
7 Commission would have to look at potentially new  
8 requirements for the certification of facilities for the  
9 combustion of biomethane from pre-2011 contracts.

10 And I'm thinking over that bill and I can't  
11 remember any requirements in that bill that might impose  
12 extra requirements on the certification of facilities  
13 for those -- those older contracts, or even for the  
14 requirements for the eligibility of that fuel under the  
15 old contracts.

16 I thought those old contracts were basically  
17 grandfathered.

18 MR. HERRERA: So, you're right, so the  
19 biomethane procurement contracts, not the procurement of  
20 electricity contract, right, is what 2196 is focused on,  
21 Bill.

22 But there are provisions in there, for example,  
23 that require I think a beefed up verification process  
24 that the Energy Commission will have to use in place.

25 For example, we would need to take a look at our

1 existing rules to see if they are as rigorous as may be  
2 required by 2196, or if we need to impose some  
3 additional requirements.

4 2196 includes, for even these grandfathered  
5 provisions, a requirement that the biomethane source be  
6 online and injected into common carrier pipeline by  
7 April 1, 2014.

8 So, for example, if you had an existing contract  
9 for biomethane that included a source that wouldn't be  
10 producing gas until after that April 2014 date, then I  
11 think, you know, our rules need to address that.

12 So, there are some grandfathering -- there is a  
13 grandfather provision, but it's subject to some  
14 conditions.

15 And I think what I'm saying is we're going to  
16 need to take a look at those, those requirements in the  
17 statute and figure out how to apply them to these  
18 existing contracts.

19 MR. WESTERFIELD: Yeah, I understand the general  
20 point. But I was just wondering if you had any  
21 particulars that you had in mind.

22 I know the 2014 date, it's my recollection this  
23 only applies to contracts that were signed after March  
24 28th, 2012. So, I was just trying to think in the back  
25 of mind whether there were any particular requirements

1 that you think needed to be developed.

2 MR. HERRERA: Right. So, we can chat  
3 afterwards, Bill, but I think the provisions in the  
4 statute actually -- that March -- excuse me, that April  
5 1, 2014 date apply to contracts that were executed prior  
6 to March 29th, 2012.

7 MR. WESTERFIELD: Okay. All right thank you.

8 MS. BARKALOW: Okay, I have a blue card here  
9 from Sergio, and the question is; "Can you go over the  
10 dates of which the draft report will be released and  
11 finalized?"

12 And I don't really -- I'm not able to give any  
13 firm dates right now. We will hope to turn around right  
14 after this workshop and get ready to start drafting the  
15 Verification Report.

16 And the goal would be to have a draft released  
17 publicly by the end of this year. I really hope that's  
18 possible, but I cannot promise.

19 And then we hope to have the final one shortly  
20 after the draft, so I'm hoping within the next six  
21 months or so.

22 Any other questions?

23 Okay. All right, then, we will go ahead with  
24 Theresa Daniels' presentation.

25 MS. DANIELS: Hello everyone. My name is



1 Theresa Daniels and I'm going to discuss the 2008  
2 through 2010 RPS Procurement Verification Process and  
3 the current results of our analysis.

4           The 2008 through 2010 verification process  
5 includes procurement data from a total of 16 retail  
6 sellers; however, not all of the retail sellers  
7 reporting RPS procurement for each year.

8           As you can see, the total RPS-eligible  
9 procurement amount has increased each year. In 2008  
10 approximately 23.8 terawatt hours of renewable  
11 procurement from 520 renewable facilities will be  
12 verified as RPS eligible.

13           In 2009, approximately 29.2 terawatt hours of  
14 renewable procurement, from 529 facilities will be  
15 verified as eligible.

16           And in 2010, approximately 31.8 terawatt hours  
17 of renewable procurement, from 561 facilities will be  
18 verified as eligible.

19           Please note that the 2010 renewable procurement  
20 amounts include generation from years 2008 and 2009 that  
21 were claimed in 2010.

22           During the verification process 551 claims in  
23 2008 were verified as RPS eligible, and 608 claims in  
24 2009, and 620 claims in 2010 were verified as RPS  
25 eligible.

1           Of these, staff identified approximately 38 over  
2 claim issues, 12 multi-fuel issues, and 13 energy  
3 delivery issues.

4           Eleven over claim issues were identified and  
5 resolved through our collaboration with Green-e-Energy,  
6 a program of the Center for Resource Solutions.

7           Staff resolved the majority of these issues by  
8 having the retail seller submit supporting documentation  
9 for their claims.

10           However, in some cases retail sellers re-filed  
11 their RPS claims to remove ineligible procurement.

12           The sources of the 2008 through 2010  
13 verification data; RPS procurement claims are reported  
14 on the CEC RPS track form and WREGIS compliance reports.

15           We also use procurement data reported to the  
16 1305 Power Source Disclosure Program, and voluntary  
17 WREGIS sales information from Green-e-Energy in our  
18 analysis to determine that the RPS procurement claims  
19 are not double counted.

20           We also used generation data that we got from  
21 various Energy Commission programs, EIA, and directly  
22 from the generating facilities, themselves, on the CEC  
23 RPS GEN form.

24           This slide shows the information found on the  
25 CEC RPS Track Form. It includes the facility name, fuel

1 type, various ID numbers, and the annual procurement  
2 amount.

3           There's also a Schedule 2 of this form, which  
4 includes monthly procurement data for each claim.

5           As Gina mentioned in her presentation, this form  
6 was used to report RPS procurement data in 2008 when  
7 retail sellers and generators were transitioning to  
8 WREGIS.

9           In 2009 and 2010 this form was used for  
10 generation that was not available in WREGIS, when  
11 supporting documentation was provided confirming this.

12           This slide shows the information found on the  
13 WREGIS compliance report. Among other things, it  
14 includes the generator's name, fuel type, the vintage  
15 month and year of the certificates, the certificate  
16 quantity, the certificate serial number and the NERC e-  
17 Tag ID, if e-Tags are matched with the certificates.

18           This is the 2008 through 2010 RPS procurement  
19 verification methodology. To verify procurement is RPS  
20 eligible, Energy Commission staff checked that all  
21 claims are from RPS-certified facilities by internal  
22 collaboration with the certification staff, compare all  
23 load-serving entities' procurement claims from  
24 individual facilities with generation data to verify  
25 that there is sufficient generation for all procurement

1 claims.

2 Determine, to the extent possible, the claim was  
3 counted only once by coordinating with other states,  
4 including Oregon, Washington, Nevada and Green-e-  
5 Energy's voluntary REC PROGRAM.

6 And to verify that procurement from out-of-state  
7 facilities satisfies RPS delivery requirements through  
8 2010; the sources for this include the CEC RPS Delivery  
9 Form, NERC e-Tags, and the WREGIS NERC e-Tag Summary  
10 Report.

11 This is information that we included in the  
12 appendices of the Verification Report to demonstrate the  
13 detailed findings of our analysis.

14 We report the facility information, the annual  
15 generation procured, the procurement from other sources,  
16 annual generation of the facility, and the percent  
17 difference between the total procurement and the  
18 generation amount.

19 Staff works closely with retail sellers in the  
20 verification process to gather supplemental  
21 documentation to verify claims and to make adjustments  
22 to retail sellers' procurement claims, including adding  
23 in additional procurement claims and removing ineligible  
24 procurement claims.

25 This is our first time using -- this is our

1 first time verifying using WREGIS data and we're  
2 developing process to address issues that have been  
3 identified using WREGIS.

4 One issue is when retail sellers want to make  
5 corrections to their procurement data, WREGIS only  
6 allows for certificates to be un-retired within 12  
7 months of the retirement. After that, certificates  
8 cannot be un-retired.

9 With the ITS, retail sellers were able to submit  
10 a revised RPS Track Form with the ineligible claim  
11 removed. But corrections cannot be made this way to the  
12 WREGIS reports.

13 The process that we are using to address this is  
14 to have retail sellers submit a letter to Energy  
15 Commission staff documenting which procurement claims  
16 should be removed as an ineligible claim for the  
17 verification report.

18 In cases that WREGIS reduces the amount of  
19 certificates created in a future year to correct an  
20 error in the current year, retail sellers can submit an  
21 additional letter requesting that the procurement be  
22 reduced in the current year and credited back in the  
23 future year that WREGIS is reducing.

24 There may be cases in which the amounts claimed  
25 in the Verification Report and WREGIS will differ. The

1 end result of this is that the Verification Report  
2 should be used as the final determination of eligible  
3 procurement.

4           The RPS summary table shows the details of each  
5 retail seller's current RPS procurement eligibility.  
6 This is a template of the summary table and it includes  
7 the total procurement claimed by the retail seller, and  
8 lists the disallowances which include procurement from  
9 facilities without RPS certification, procurement from  
10 facilities in which procurement claims exceed generation  
11 by five percent or greater, procurement from distributed  
12 generation facilities, procurement of energy only,  
13 procurement from facilities that exceed fossil fuel  
14 usage limit, and procurement claimed before the  
15 beginning on -- before the facility's beginning on date.

16           This table also lists pending claims. These  
17 claims fall within the following categories; procurement  
18 without standing issues regarding electricity delivery  
19 verification and procurement without standing issues  
20 regarding biomethane gas delivery verification.

21           There are also footnotes on this table  
22 explaining each of the categories.

23           I will now go through each retail seller's  
24 individual RPS summary table.

25           Three Phases Renewables has -- Three Phases has

1 a pending 2009 claim due to the NERC e-Tags used in the  
2 delivery of their out-of-state claim not having the RPS  
3 ID number in the miscellaneous field of the tag, as  
4 required by the RPS Eligibility Guidebook.

5 Three Phases has submitted supplemental  
6 documentation in support of their claim.

7 APS Energy Service has no outstanding issues.

8 Calpine Power America also has no outstanding  
9 issues.

10 Constellation New Energy has three pending  
11 claims. One in 2008 and two in 2009, due to the NERC d-  
12 Tags used in the delivery for their out-of-state claims  
13 not having the RPS ID number of the facilities in the  
14 miscellaneous field of the e-Tags, as required by the  
15 RPS Eligibility Guidebook.

16 CNE has submitted supplemental documentation in  
17 support of their claims.

18 Commerce Energy has no outstanding issues.

19 Direct Energy has a pending 2008 claim due to  
20 the NERC e-Tags used in the delivery of their out-of-  
21 state procurement not having the RPS ID number in the  
22 miscellaneous field of the e-Tag, as required by the RPS  
23 Eligibility Guidebook.

24 Direct Energy has also submitted supplemental  
25 documentation in support of their claim.

1 Paxel Playing Field has no outstanding issues.

2 Pilot Power has a pending 2010 claim due to the  
3 biomethane gas delivery verification.

4 Noble Americas also has a pending 2010 claim due  
5 to biomethane gas delivery verification.

6 Marin Energy Authority has no outstanding  
7 issues.

8 Shell Energy has pending procurement claims in  
9 years 2008 through 2010 for the NARC e-Tags used in the  
10 delivery of its out-of-state procurement not having the  
11 RPS ID number in the miscellaneous field of the e-Tag.

12 Also, Shell's 2010 procurement amounts include  
13 vintage 2008 and 2009 generation, which Shell chose to  
14 apply to 2010.

15 PacifiCorp has no outstanding issues.

16 Sierra Pacific Power Company also has no  
17 outstanding issues.

18 PG&E resubmitted it's 2008 RPA track form to  
19 remove procurement that is also being reported in WREGIS  
20 -- in PG&E's WREGIS compliance report.

21 PG&E also has pending claims in 2008 for not  
22 having the RPS ID number in the miscellaneous field of  
23 the NARC e-Tags for the delivery of its out-of-state  
24 procurement claim.

25 And in 2009 and 2010 PG&E has pending claims due



1 to the biomethane gas delivery verification.

2 San Diego Gas and Electric has no outstanding  
3 issues.

4 This table shows Southern California Edison's  
5 2008 through 2010 eligible procurement amounts. During  
6 the verification process SCE revised their procurement  
7 claims to remove ineligible procurement.

8 SCE currently has no outstanding issues.

9 This table shows SCE's updated RPS procurement  
10 claims from 2001 and 2003, through 2007. SCE removed  
11 previously reported ineligible procurement claims from  
12 its 2001 and 2003, through 2007 total procurement  
13 claimed amounts, and also removed a portion of  
14 procurement claimed that was determined to be ineligible  
15 in each of those years, as well.

16 So, these are their updated procurement claim  
17 amounts.

18 The next steps include finishing up the  
19 verification analysis and reporting any revisions to the  
20 data in the draft 2008 through 2010 RPS Procurement  
21 Verification Report.

22 We are hoping that the draft report will be made  
23 available for public comment by the end of the year.

24 When the final report is adopted by the Energy  
25 Commission, it will be transmitted to the CPUC for

1 compliance determinations.

2           If anyone has public comments, you can provide  
3 them now.

4           Are there any comments?

5           Are there any comments for users on WebEx, WebEx  
6 participants?

7           If anybody on WebEx has any comments, you're  
8 unmuted so you can speak now, or any telephone  
9 participants.

10           MS. BARKALOW: All right. So, I guess there are  
11 no comments. Feel free to provide written comments.  
12 They are due October 1st. And the information to submit  
13 those comments is provided in the details of the  
14 workshop notice.

15           So, we have wrapped up -- yeah. So, we've  
16 wrapped up fairly early here. It's about 10:20. I  
17 propose that we take a break, maybe meet back here  
18 about, let's see, 10:40, and then we'll get started  
19 about 10:45. And we'll go through the second  
20 presentation -- or, actually, it's the presentation on  
21 SB X 1-2.

22           And for this one we will not have a court  
23 reporter, but we will include WebEx, so people can  
24 participate via WebEx.

25           And this really will be more of an informal

