

April 15, 2013

**By Electronic Mail**

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Re: Docket No. 11-RPS-01 and Docket No. 02-REN-1038; Renewables Portfolio Standard; Comments of Powerex Corp. on the Proposed Changes to the *Renewables Portfolio Standard Eligibility Guidebook, Seventh Edition Appendices*

Powerex Corp. (“Powerex Corp.”) hereby respectfully submits its comments addressing proposed changes to the *Renewables Portfolio Standard Eligibility Guidebook, Seventh Edition Appendices* (“Draft Forms”).

**Annual Hourly Comparison Spreadsheet**

The Annual Hourly Comparison Spreadsheet in Appendix B sums the eligible PCC 1 MWh and allows the equivalent MWh on NERC e-Tags to be matched, thereby avoiding stranding eligible PCC 1 volume.<sup>1</sup> However, the current language in the *Renewables Portfolio Standard Eligibility, Seventh Edition, Staff Draft Guidebook* (“Draft Guidebook”) is inconsistent with this methodology as it states that the “ ‘Used MWh’ amount should not be higher than the sum of the lesser of the hourly generation and hourly final schedule amounts.”<sup>2</sup>

The language in the Guidebook should be modified to accommodate the calculation methodology in Appendix B.

**Future Improvements to WREGIS**

As discussed in Powerex’s Comments on the Draft Guidebook (and as acknowledged in fn. 9 of Draft Appendix A):

WREGIS could develop a sufficiently detailed WREGIS NERC e-Tag “Retirement” Summary Report so that information regarding matched e-Tag/REC data would be accessible to a POU in its REC retirement account. POU’s would then be able to directly supply

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<sup>1</sup> Annual Hourly Comparison Spreadsheet, fn. 8.

<sup>2</sup> *Renewables Portfolio Standard Eligibility, Seventh Edition, Staff Draft Guidebook* (unmarked), p. 105.

the CEC with sufficient proof of delivery. This functionality was identified in WREGIS Product Change Order 165 (“PCR 165”).<sup>3</sup>

If such a WREGIS change were to be implemented, it would reduce the reporting burden on regulated entities and simplify the verification process for CEC staff. Powerex suggests that the potential for future improvements to WREGIS be acknowledged within the Guidebook to minimize the need for future changes to the Guidebook should such a change be enabled within WREGIS.

Finally, Powerex would like to thank the Energy Commission for the opportunity to provide comments on the Draft Forms. Powerex greatly appreciates all of the time, attention and effort that CEC staff has put into considering and responding to parties’ comments and concerns; and looks forward to continuing to work with the CEC on implementation of (SB) X1-2.

Very truly yours,

GOODIN, MACBRIDE, SQUERI,  
DAY & LAMPREY, LLP

*/s/ Suzy Hong*

Suzy Hong

On behalf of Powerex Corp.

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<sup>3</sup> Comments of Powerex Corp. on the Proposed Changes to the *Renewables Portfolio Standard Eligibility Guidebook*, p. 2.