

BEFORE THE CALIFORNIA ENERGY COMMISSION**Rulemaking to Establish Enforcement
Procedures for Renewables Portfolio
Standard for Publicly Owned Electric
Utilities****Docket No. 13-RPS-01****M-S-R COMMENTS ON DRAFT RPS COMPLIANCE REPORTING FORMS**

On July 29, 2013, the California Energy Commission (Commission or CEC) hosted a *Workshop for Renewable Portfolio Standard (RPS) Implementation for Local Publicly Owned Electric Utilities (POUs)* to address reporting and implementation issues regarding the POU RPS Enforcement Regulation (RPS Regulation), including proposed forms for submitting RPS compliance data to the CEC. M-S-R Public Power Agency¹ (M-S-R) appreciates the opportunity to provide these initial comments to the CEC regarding the proposed reporting forms.

The RPS Regulation requires, for the first time, that a great deal of information be provided to the CEC each year. Under the Regulation, POUs must provide static and changing data regarding RPS generation facilities and procurement. M-S-R appreciates the thoughtful consideration that has gone into compiling the draft spreadsheets and forms to be utilized for reporting this data. While M-S-R and its members understand that the spreadsheets are still considered draft, we would like to offer the following comments in the interest of further developing forms that will facilitate both ease of reporting and reviewing the data contained therein.

General Comments

As CEC staff has acknowledged, the compilation and ultimate review of the requested data is no mean feat, and will require countless hours of staff time on the part of both the POUs and the CEC. While there is no way to entirely eliminate this burden, there are several changes that can be made to the forms that should reduce it. The most immediate need is for copy and paste functionality. It is important that the forms be designed and utilized in a way that creates

¹ Created in 1980, the M-S-R Public Power Agency is a public agency formed by the Modesto Irrigation District, the City of Santa Clara, and the City of Redding. M-S-R is authorized to acquire, construct, maintain, and operate facilities for the generation and transmission of electric power and to enter into contractual agreements for the benefit of any of its members. As such M-S-R does not serve retail load within California but supplies wholesale power under long-term contracts to its retail load-serving members.

the least opportunity for errors – allowing the functionality to copy and paste data that has already been entered and calculated will reduce the chances of transposition and other minor data-entry errors that could have significant detrimental implications.

It is important that all static data only be entered once. This will ensure that errors do not occur that are the result of transcription or data entry.² As currently proposed, static data is included in several different forms. Albeit, sometimes it is requested in a slightly different form, but sometimes it is identical. The similar requests should be reconciled, and all the same data should be provided only once. Once the static data is submitted, the CEC should be able to send the POU a summary of the data as it appears in the CEC’s new database for verification by the POU.

M-S-R shares the concerns expressed by several stakeholders during the July 29 Workshop regarding the administrative effort that is required to track and report dynamic schedules and metered data. To reduce the burden, dynamic schedule or meter data should be submitted one time on a single form, and include only one identifier per resource (some of the proposed spreadsheets require three or four identifiers) and the dynamic data. There should also be the option to either use a pre-defined spreadsheet or provide the data to the CEC as an XML file created by the POU. Using a simple flat file format would allow POU’s to utilize standard spreadsheet technology to organize the data, and would allow the CEC to import that data into a database. As with the static information, once the data has been submitted, the CEC should then send a report of all dynamic data back to the POU’s to verify accuracy of the data as it exists in the CEC database, and once validated by the POU, CEC staff can then generate spreadsheet workbooks to be used for verifying compliance.

M-S-R encourages the utilizing of a database framework. Such a format would be less burdensome to administer for both the CEC and the POU’s, and would ensure a higher level of data integrity than the proposed spreadsheet-based form system.

Comments on Specific Forms

CEC_RPS_HCO: Should include copy and paste functionality; currently includes at least one more static field than necessary.

² The POU’s submit information to the CEC each year in several different formats not associated with the RPS Regulation. However, the same concerns regarding the accuracy of the data and the potential confusion that could result from slightly different definitions and data-entry errors applies equally to all data submitted to the Commission.

CEC_RPS_GEN: Includes copy and paste function, which is good; cells mix what ought to be static data with dynamic data; includes at least 3 (possibly 4) fields that are not necessary.

CEC_RPS_Etag: Should include copy and paste functionality.

CEC_RPS_Hourly: Should include copy and paste functionality; "Total Retired for Reporting Year (MWh)" field formatted as date, not number; "Contract Number" field formatted as date; data entry fields are not separated from calculated fields, would need to be rearranged to allow copy and paste.

CEC_RPS_Track: Includes copy and paste function, which is good; includes at least 5 static fields that are not required; "Matched E-Tag ID" field is not clearly explained in the footnotes. Any information not explained or defined in the footnotes should include a reference to the applicable section in the Regulation.

DRAFT_POU_RPSComplianceSpreadsheet: Summary pages should be protected, since they contain only cells calculated from other worksheets, but they are not protected; cells mix what ought to be static data with dynamic data.

Conclusion

M-S-R appreciates the opportunity to provide this feedback to the Commission regarding the forms. M-S-R is also encouraged by Staff's ongoing willingness to work with stakeholders and welcomes the opportunity to meet with Staff to discuss any of the feedback and suggested revisions addressed in these comments.

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Respectfully submitted,



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