

STATE OF CALIFORNIA

ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION

In the matter of:

Enforcement Procedures for the Renewables Portfolio
Standard for Local Publicly Owned Electric Utilities

Docket No. 13-RPS-01

**COMMENTS OF TURLOCK IRRIGATION DISTRICT ON RENEWABLES
PORTFOLIO STANDARD IMPLEMENTATION FOR LOCAL PUBLICLY OWNED
ELECTRIC UTILITIES**

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Turlock Irrigation District (“TID”) appreciates this opportunity to provide comments to the California Energy Commission (“Commission”) on Renewables Portfolio Standard (“RPS”) reporting and implementation issues for local publicly owned electric utilities (“POUs”).

Described more fully below, the Commission should extend the expected October 31, 2013 reporting deadline for the POUs’ RPS Compliance Reports until December 30, 2013.

Additionally, there are several aspects of the RPS compliance reports that will impose unnecessary administrative burdens on POUs. The Commission should simplify and streamline the reporting process by eliminating duplicative or unnecessary reporting requirements associated with the “Draft POU RPS Compliance Spreadsheet”¹ (“Compliance Report”) and other draft Commission reporting forms.

I. Timing Issues Warrant an Extension of POU Reporting Deadlines

Currently, multiple reports are expected to be due to the Commission on October 31,

¹ The Draft POU RPS Compliance Spreadsheet is available at http://www.energy.ca.gov/portfolio/documents/2013-03-14_workshop/draft_forms/Appendix_B_Draft_Forms/DRAFT_POU_RPSComplianceSpreadsheet.xlsx.

2013.² These reports include the RPS Compliance Report and the CEC-RPS-Hourly report. The current deadline presents a dilemma as the reports are still in draft form and may need to be revised if the Regulations are modified by the OAL. Although TID fully expects the Commission to extend the reporting deadline if significant changes are made to the Regulations, it would benefit all parties, including the Commission, to avoid extensive review, testing, and trouble-shooting of the draft templates until the Regulations have been officially finalized. To avoid unnecessary administrative burdens associated with the review of the draft reporting templates, the Commission should extend the reporting deadline from October 31, 2013 until December 30, 2013.

This extension would not only provide additional time to ensure that the templates report required information and avoid unnecessary administrative burdens, but an extension is warranted to ensure that all information required in the templates can be accurately reported. The Compliance Report requires POUs to report historic carryover information. However, the historic carryover report, CEC-RPS-HCO, is not expected to be due until December 30, 2013. Therefore, POUs are not required, and in fact, may not have all of the necessary information, to submit the Compliance Report by October 31, 2013. To ensure that all required information can be provided, and to provide adequate time to review and revise any reporting templates, the Compliance Report, CEC-RPS-Hourly Report, and the CEC-RPS-HCO report should be due at the same time, on December 30, 2013.

² It is important to note that the reports expected to be due on October 31, 2013, as well as other reports expected to be due later this year, are still in draft form and cannot be finalized until the Office of Administrative Law (“OAL”) has approved the Enforcement Procedures for the RPS for POUs (“Regulations”), expected to occur by August 29, 2013.

II. Reports Should be Revised to Eliminate Duplicative Entries and Requirements

To minimize administrative burdens associated with completing reporting templates, the Commission should strive to avoid duplicative entries and reporting identical information in multiple places. This will not only make reporting and review of information easier, but it will help avoid errors as the likelihood of making a mistake increases with every additional Excel cell or template that must be completed.

A. The Compliance Report Should Not Include Detailed Information About Historic Carryover

The Commission already requires POUs to submit form CEC-RPS-HCO. It is unclear why additional and more detailed information about historic carryover amounts is required to be reported in the Compliance Report as well. TID recommends that the “Static Contract Info HC10_PCC 0” tab of the Compliance Report be eliminated or significantly simplified. Instead, the Commission should collect data needed to determine historic carryover volumes using the CEC-RPS-HCO report. Providing all of the relevant information in one location makes more sense and will make completing and reviewing the report simpler and less burdensome.

B. The Commission Should Maximize Information in its Possession to Reduce Reporting Burdens

Currently, the reporting templates require POUs to report information that is already in the Commission’s possession. For example, the Compliance Report asks for detailed information about procurement information, including specific facility data (e.g., facility name, technology, fuel type, location, facility status, eligibility date, online date, RPS ID, etc.). In order to count towards the RPS, facilities must be certified by the Commission as RPS-eligible. As part of the certification process, the Commission conducts an extensive review of facilities, including much of the information requested in the Compliance Report. Rather than force POUs

to provide the Commission with data already in its possession, the reporting template should be simplified to eliminate the provision of duplicative information. This will significantly reduce the administrative burden of reporting while still ensuring that the Commission has the necessary data to verify procurement and make a compliance determination.

Accordingly, the Commission should eliminate columns in the Compliance Report that correspond to data in the Commission's possession. Specifically, columns C, D, E, F, H, I, J, M, N, and O of the "Static Contract Info PCC 1" tab, columns C, D, E, F, H, I, L, M, and N of the "Static Contract Info PCC 2 Ren" tab, columns E, F and I of the "Static Contract Info PCC 2 Sub" tab, and columns C, D, E, F, H, I, L, M, N, of the "Static Contract Info PCC 3" tab should be eliminated. TID has already explained above why the Commission should not include the "Static Contract Info HC10_PCC 0" tab in the Compliance Report, but data in that tab should also be eliminated, including columns C, D, E, F, G, H, I, L, M, and N.

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III. Conclusion

TID appreciates this opportunity to provide comments on the draft RPS reporting templates for POUs and looks forward to working with the Commission on these issues going forward. For the reasons described above, the Commission should minimize administrative burdens on reporting entities by avoiding duplicative and unnecessary reporting requirements and streamline the reporting process by simplifying the draft templates.

Respectfully submitted,



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