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October 3, 2014 | Submitted Electronically

California Energy Commission
Dockets Office, MS-4
RE: RPS Implementation – Docket No. 11-RPS-01
1516 Ninth Street
Sacramento, California 95814-5512

California Energy Commission

DOCKETED

11-RPS-01

TN 73796

OCT 03 2014

RE: SCPPA Comments on the October 7, 2014 California Energy Commission's Business Meeting Consideration of the Notice of Proposed Process to Allow Creation of Retroactive Renewable Energy Certificates and Extend the Deadline for the Interim Tracking System for the Renewables Portfolio Standard (RPS Implementation) (Docket No. 11-RPS-01)

The Southern California Public Power Authority (SCPPA) appreciates the opportunity to provide these comments regarding the California Energy Commission staff's recommendation to establish a process that would provide for the creation of retroactive Renewable Energy Credits (RECs) in the Western Renewable Energy Generation Information System (WREGIS) and to extend the deadline for publicly owned utilities to use the Interim Tracking System to report procurement of generation not tracked in WREGIS through December 31, 2013.

SCPPA is a joint powers authority consisting of eleven municipal utilities and one irrigation district. SCPPA members deliver electricity to approximately two million customers over an area of 7,000 square miles, with a total population of 4.8 million people. SCPPA members include the municipal utilities of the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District.

SCPPA joins the Northern California Power Agency and the California Municipal Utilities Association in supporting the Energy Commission staff's recommendation. We greatly appreciate staff's efforts to work with stakeholders to address process improvements through existing State rules and by working with WREGIS to retroactively ensure the proper counting of renewables procurement in specific situations as outlined in Resolution Number 14-1007-10. Doing so will ensure that stakeholder progress towards meeting California's Renewables Portfolio Standard is properly recorded.

We would also like to support comments offered by the Los Angeles Department of Water and Power that would further improve the staff's proposal and respectfully request the Energy Commission's consideration of revisions that would:

- Recognize that RECs may be created on a *unit-by-unit* basis, instead of on a *facility* basis, such that multiple requests for the creation of retroactive RECs may be necessary and, therefore, permitted.
- Minimize administrative restrictions for stakeholders on who could request the creation of retroactive RECs.
- Eliminate a multiple-audit requirement since rules to prevent double-counting of RECs are already in place.
- Address concerns with the extended use of the Interim Tracking System that may prohibit usage to report aggregated solar generation claims.

Thank you for the opportunity to provide these comments to the Energy Commission in this proceeding. SCPPA looks forward to work with the Energy Commission towards further development of the next *Renewables Portfolio Standard Eligibility Guidebook*.

Respectfully submitted,

Tanya DeRivi
Director of Regulatory Affairs