



September 29, 2014

California Energy Commission
DOCKETED
11-RPS-01
TN # 74253
JAN 05 2015

RECEIVED
OCT 07 2014
BY: _____

California Energy Commission
Attn: RPS Certification
1516 Ninth Street, MS-39
Sacramento, CA 95814

Re: Extension of Time for Facility Certification Request

Dear Executive Director:

This letter is a request for an extension of time for RPS certification with the California Energy Commission for the following three facilities:

CEC ID	WREGIS ID	Unit Name
60168E	W629	Merced ID (Parker)
60183E	W676	South SJID, (Frankenheimer)
60184E	W677	South San Joaquin ID (Woodward)

The addresses of the respective units are:

Parker powerhouse
14023 Snelling Road
Merced, CA 95348

Frankenheimer Powerhouse
10421 Frankenheimer Road
Oakdale, CA 95361

Woodward Powerhouse
15476 26 Mile Road
Oakdale, CA 95361

TID had recently started managing the energy disposition of the units mentioned above. Having been notified September 25th that these three facilities had been disapproved as certified with the CEC, we are including this request letter with the completed CEC-RPS-1 certification forms. As such, TID is requesting an extension as of June 2013, the time when these units' generation were being recorded in WREGIS. We shouldn't need any additional time to prepare the certification documents.

Executive Director
September 29, 2014
Page 2

The reason TID had not submitted the proper documentation on time was due to an accidental oversight on our part accompanied by the erroneous assumption that once a facility was certified, it would stay certified. As TID saw the RECs being accepted in WREGIS, we mistakenly assumed all was satisfactory. We apologize for this oversight.

Financial consequences, due to the number of RECs in WREGIS, of this oversight through Oct 1, 2014, are potentially represented in the following table:

Unit	2013	2014
Parker	3,670	2,651
Frankenheimer	12,392	11,653
Woodward	4,387	2,937
Totals	20,449	17,241

A conservative estimate of price for PCCO RECs is \$10.00 resulting in a potential financial loss to districts ratepayers of $\$10.00 * 37,690 = \$376,900$.

As a utility that is publicly owned, the people most affected due to an oversight on staff's part will be our ratepayers. These renewable small hydro units are not profitable in the first place, so the ability of these units to recoup some of their losses through the REC value is important for our ratepayers. TID appreciates CEC staff time and energy in consideration of this matter. Should you have any questions, please feel free to call Ken Nold at 209-883-8362.

Sincerely,



Ken Nold
Utility Analyst