

## DOCKETED

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## CALIFORNIA ENERGY COMMISSION

## STAFF WORKSHOP

In the Matter of:	) Docket No.
	) 16-RPS-01
	)
	)
Developing Guidelines for the	) Renewables Portfolio
50 Percent Renewables	) Standard Eligibility
Portfolio Standard	) Guidebook
_____	) Scoping Workshop

## CALIFORNIA ENERGY COMMISSION

THE WARREN-ALQUIST STATE ENERGY BUILDING

FIRST FLOOR, ART ROSENFELD HEARING ROOM

(HEARING ROOM A)

1516 NINTH STREET

SACRAMENTO, CALIFORNIA

THURSDAY, MARCH 17, 2016

9:30 A.M.

Reported By: Kent Odell

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Kevin Chou, Renewable Energy Office CEC

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Timothy Tutt, SMUD

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I N D E X

	<u>Page</u>
Introduction Lynette Green, RPS Verification	4
Staff Presentation on Proposed Topics Lynette Green, RPS Verification	7
Discussion/Q & A on Staff's Proposed Topics Christina Crume, RPS Certification Brian McCollough, RPS Verification Theresa Daniels, RPS Verification	13
Stakeholder Proposed Topics New topics to be identified	42
Next Steps and Closing Comments Lynette Green, RPS Verification	47
Adjournment	49
Court Reporter's Certification	50
Transcriber's Certification	51

## 1 P R O C E E D I N G S

2 MARCH 22, 2016

9:32 A.M.

3 MS. GREEN: I think we're going to go ahead and  
4 get started.5 Good morning, everyone. My name is Lynette  
6 Green. And I'm the Project Manager of the RPS Eligibility  
7 Guidebook. Welcome to today's Scoping Workshop on the next  
8 edition of our RPS Guidebook. And this Workshop is being  
9 conducted as part of the Energy Commission's RPS  
10 Proceeding.11 Joining me at the table are Brian McCollough and  
12 Theresa Daniels, staff working on verification; also  
13 Christina Crume, who works on certification, and Gabe  
14 Herrera, our Legal Counsel. I also want to acknowledge  
15 Kevin Chou, who works on certification and is assisting us  
16 on WebEx. And also, I would like to introduce Elisabeth de  
17 Jong, who is also working on certification. I believe we  
18 are also joined by Emily Chisholm, through WebEx, who works  
19 on compliance.20 Just a quick housekeeping before we get started.  
21 Restrooms are in the atrium, out the double doors and to  
22 your left. And if there's an emergency and we need to  
23 evacuate the building, please follow the staff outside to  
24 Roosevelt Park, which is diagonal to the building and wait  
25 there until it's safe to return.

1           Today's workshop is being broadcast through the  
2 WebEx conferencing system and parties need to be aware that  
3 it is being recorded, so please keep your lines on mute.  
4 We'll make an audio recording available on our website a  
5 couple of days after the workshop, and a written transcript  
6 will be posted in about two weeks.

7           I'll provide an overview of the staff's proposed  
8 substantive and non-substantive changes. And we will then  
9 provide an opportunity for comments and questions for the  
10 public.

11           We encourage that you limit your comments to five  
12 minutes to accommodate everyone who would like to provide  
13 oral comments. You're also welcome to supplement your oral  
14 comments with detailed written comments. During the public  
15 comment period, we will take comments first from the people  
16 in the room, followed by the WebEx participants and those  
17 participating by phone only.

18           If you are in the room and wish to speak, please  
19 use the microphone at the center podium, so that the people  
20 participating remotely can hear you and make sure to state  
21 your name and affiliation. It's also helpful to give the  
22 transcriber your business card after you speak, to make  
23 sure your name and affiliation are reflected correctly in  
24 the transcript.

25           For our WebEx participants, you can use either

1 the chat or raised hand function to let our WebEx  
2 coordinator know that you have a question or comment and  
3 we'll take them at the appropriate time. For those  
4 participating only by phone, we will open the lines at the  
5 end of the public comment period to give you an opportunity  
6 to ask questions or provide comments.

7 We're accepting written comments at the close of  
8 business, March 30th. And the workshop notice explains the  
9 process for submitting written comments through the Energy  
10 Commission's e-commenting system. Upon submitting your  
11 comments, they will be docketed and posted. And  
12 subscribers to the Renewable Listserv will be notified.

13 We'll then continue on to stakeholder proposed  
14 topics. This segment will be open to anyone who has a new  
15 topic to propose.

16 Finally, before we adjourn, we'll provide a  
17 tentative schedule for the guidebook development. Our goal  
18 is to finish by noon, but if we find it necessary to  
19 continue beyond that, we'll take a lunch break at the  
20 appropriate time.

21 The goal of this workshop is to seek public input  
22 on staff's proposed changes, request answers to staff's  
23 questions, and provide stakeholders an opportunity to  
24 suggest new topics for potential revisions to the next  
25 edition of the guidebook. All of your comments and

1 responses to our questions will be considered, but must be  
2 balanced with ways to ensure program integrity.

3 I wanted to identify what staff will not cover in  
4 this workshop, or include in the next guidebook revision.  
5 That's the POU Regulations, which includes compliance  
6 period past 2020, long-term contracting requirement,  
7 calculation of excess procurement, POU exemptions  
8 established under Senate Bill 350, and integrated resource  
9 plans; also any future legislation and specific  
10 certification applications. Except for the last bullet,  
11 which you may contact RPS Certification at any time, these  
12 topics will be handled either in the next POU Regulations  
13 or the Tenth Edition Guidebook. I believe the POU  
14 regulations pre-rulemaking is tentatively scheduled to  
15 start in May or June, so just to let you know.

16 So with that, I'll start with staff's proposed  
17 substantive changes. The first one triggers the need for a  
18 guidebook revision, that's Senate Bill 350. It's a new  
19 legislation approved by the Governor in October 2015, and  
20 SB 350, also known as the Clean Energy and Pollution  
21 Reduction Act of 2015, increased the amount of eligible  
22 renewable energy the utilities would procure to 50 percent  
23 by 2030.

24 It also amended the RPS eligibility requirements  
25 of a facility engaged in the combustion of municipal solid

1 waste. The law no longer considers MSW combustion to be an  
2 eligible renewable energy resource, unless the only  
3 qualified facility entered into a contract before January  
4 1st, 2017. Consequently, only electricity generated by  
5 this facility for the contract term entered into prior to  
6 January 1st, 2017, will result in the creation of RECs. So  
7 staff is proposing to reflect these changes in the next  
8 revision of the guidebook, including requiring this  
9 facility to provide documentation to validate that it meets  
10 the new requirements.

11 The second item is to amend the process for the  
12 creation of retroactive RECs in WREGIS. This is a process  
13 adopted in October 2014, through a resolution which was  
14 then incorporated into the Eighth Edition of the Guidebook.

15 After receiving two separate requests in 2015 and  
16 implementing the process, staff learned that the WREGIS  
17 process for considering and approving the Energy  
18 Commission's request was not fully taken into consideration  
19 in terms of WREGIS timing. WREGIS also requires that a  
20 copy of the Audit Report be provided for its consideration  
21 and approval. Therefore WREGIS would only start the  
22 process when the Energy Commission approves a request and  
23 forwards a complete and approved Audit Report. Based on  
24 staff experience, the entire process could take nine months  
25 at a minimum.

1           The current requirement specifies that the  
2 retroactive RECs shall not be permitted for any generation  
3 that receives the date of the request by more than 24  
4 months, or the eligibility date assigned to the facility or  
5 unit, whichever is earlier. Staff is proposing to modify  
6 the allowed time from 24 months to 12 months to avoid the  
7 issue of retroactive RECs bumping into the 36-month  
8 retirement rule.

9           Reducing the allowed time to 12 months will  
10 accommodate any unexpected delays in the overall process.  
11 And examples of that include an applicant may submit an  
12 incomplete request, which would require getting additional  
13 information, or an applicant may request a time extension  
14 to submit a complete Audit Report in addition to the  
15 required 90 days. Or WREGIS may decide to cancel their  
16 monthly WREGIS meeting, which could delay putting the item  
17 to the next month. Or the Energy Commission is not able to  
18 process a request or review an Audit Report within its 30-  
19 day intention.

20           So the question staff would like to ask is should  
21 the allowed time be reduced from 24 months to 12, when  
22 requesting creation of retroactive RECs for any generation  
23 that precedes the date of request. And if not, what is a  
24 reasonable timeframe?

25           Staff is proposing to remove the requirement of

1 90 days within commercial operations date of a facility  
2 when determining the eligibility date as long as the  
3 requirements are met. In this scenario, staff would no  
4 longer consider the 90-day requirement when processing a  
5 new certification as long as the applicant can demonstrate  
6 that the facility's operations are consistent with those  
7 described in the application. Also, the facility met the  
8 requirements of the guidebook in place at the time of  
9 application and the generation from the facilities tracked  
10 in WREGIS.

11 Staff believes that by removing this 90-day  
12 requirement applicants who missed their certification  
13 submission deadline would no longer need to request an  
14 extension of time to submit a complete RPS certification  
15 application, provided that all criteria are met.

16 The questions staff would like to raise are  
17 should the requirement of 90 days within commercial  
18 operations date be removed when determining the eligibility  
19 date of a facility. Also, is it fair to require that if a  
20 facility's not certified by the utility reporting deadline,  
21 generation cannot be reported until the next reporting  
22 period? And if not, what is a balanced approach?

23 On the extension of certification application  
24 deadlines, staff is proposing perhaps to set a limit on how  
25 far back an applicant can request to get an earlier

1 eligibility date. Currently, there is no limit to request  
2 an extension of time and we'd like to ask if we should  
3 limit this to no more than three years. And if not, what  
4 is an acceptable limit and why.

5           In the amending an RPS certification, staff is  
6 proposing to remove the simple amendments criteria and  
7 revise the conditions under substantial amendments with the  
8 following. If the use of energy storage is added, if name  
9 plate capacity has decreased, if there is an increase of  
10 nameplate capacity or removal of any facility within an  
11 aggregated unit, and if a generating unit with a new WREGIS  
12 GU ID is added to a certified facility, staff would like to  
13 know if the proposed conditions under a substantial  
14 amendments to certifications are logical. If not, how  
15 should these circumstances be handled?

16           In the Eighth Edition of the Guidebook, there is  
17 an outstanding item pertaining to renewable generation  
18 being transferred between balancing authorities under the  
19 western Energy Imbalance Market. While this is considered  
20 a substantial change, at this time, staff has nothing to  
21 report on how the RECs delivered under the EIM would be  
22 classified and reviewed. Staff is still trying to get a  
23 better understanding of how the EIM works. And in the  
24 meantime, in our plan to verify these RECs in the future,  
25 staff would like to get your feedback on the acceptable

1 documentation to verify the RECs generated by participants  
2 in EIM transactions. So your feedback will be considered  
3 when we set up an agreement with Cal-ISO for the  
4 information we will need to verify for these RECs.

5           The final substantive change being proposed is to  
6 incorporate a new process as a result of the launch of the  
7 RPS Online System. The new system would now be able to  
8 take certification applications online, including requests  
9 for extension of certification deadlines and creation of  
10 retroactive RECs in WREGIS, and ultimately reporting  
11 requirements for verification and compliance. Any  
12 references to the current RPS applications and supplemental  
13 forms including submission of requests for a time  
14 extension, and creation of retroactive RECs will be  
15 replaced with a new process using the new RPS Online  
16 System.

17           So last month, staff invited a few  
18 representatives from the IOUs and POUs to provide a hands-  
19 on demonstration and get their initial feedback on the  
20 system, particularly on creating an account and its process  
21 flow. Also, staff is planning a separate public workshop  
22 sometime in the summer, on the online system to explain how  
23 this system would work.

24           The goal is to officially launch the new online  
25 system in conjunction with the adoption of the RPS

1 Guidebook. We will also provide a how to document on RPS  
2 Online System, so that any future changes to the system  
3 will not require a guidebook change or adoption.

4 And with that, I'm going to have Christina  
5 describe the online system pertaining to the certification  
6 and then Brian can explain the verification process using  
7 the online system.

8 MS. CRUME: Okay, here we go. So the online  
9 system is going to have three components. So the first  
10 component will be the account management piece, so  
11 currently certifications are based around a facility, which  
12 has applicants and facility owners. The online system will  
13 be the reverse where an organization will create an  
14 account. And then under that account they will have the  
15 certification applications and the verification reports and  
16 compliance items.

17 And the account piece, we had a brief focus group  
18 in February to establish how to create the account. And  
19 you will have multiple users. You will be able to have  
20 additional authorized persons under there as well. And  
21 then people from the account that are authorized will be  
22 able to submit certification applications, amend your  
23 applications, apply for time extension requests and  
24 retroactive RECs through the online system.

25 You will also be able to have the search

1 features, like the current facility list that is posted on  
2 the website. It will be a dynamic, in real time, status  
3 update, so you'll be able to see the status of your  
4 applications as well.

5           And then the verification piece, Brian will go  
6 over.

7           MR. MCCOLLOUGH: Hi. This is Brian McCullough.  
8 And as far as RPS Verification goes the new online system  
9 should simplify reporting as the reporting requirements  
10 will be within the system, no longer requiring independent  
11 forms, but the forms and uploads will be conducted sort of  
12 within the environment of the system. And so that way,  
13 you'll be able to double check what you're uploading and  
14 hopefully this will help reduce some of the back and forth  
15 nature of the verification process.

16           As we move through verification then it, I think,  
17 will hopefully be greatly facilitated by this new system.

18           MS. GREEN: Okay. Thanks, Christina and Brian.

19           So moving on to the proposed minor changes to the  
20 guidebook, there are a number of eligibility and reporting  
21 requirements that needed clarifications.

22           So the first one is on the eligibility for water  
23 supply or conveyance system hydroelectric facilities. As  
24 you know, beginning January 1st, 2013 applications for  
25 certification are no longer accepted for an existing

1 hydroelectric generation unit operated as part of a water  
2 supply or conveyance system, so this was clarified and  
3 amended by Assembly Bill 1478, signed by the Governor in  
4 2014. Facilities that met the deadline requirement and  
5 eventually were certified are still subject to certain  
6 limitations in terms of its generation. Therefore staff is  
7 proposing to keep this section in the guidebook even though  
8 we no longer accept new applications.

9           The second is on the process for requesting  
10 creation of retroactive RECs. Staff would like to clarify  
11 that the following information will need to be supplied.  
12 The amount of RECs requested for each month or year; a  
13 confirmation that RECs will be used for California  
14 compliance and if not, why and where will RECs be used; the  
15 reason RECs were not created in time, including any other  
16 good cause and that documentation can substantiate good  
17 cause and reasons for the retroactive REC request.

18           Also, as part of the Audit Report requirement  
19 staff would like to clarify that the letter from the  
20 administrator that we're asking, so that should specify the  
21 name of the facility including other names, the vintage  
22 month and year of the RECs in question, and other  
23 identification to distinguish the facility. The intent is  
24 to make sure a generic letter is not used when auditors  
25 obtain these letters from the administrators.

1           Staff would also like to clarify that the process  
2 for the Energy Commission to request WREGIS to create  
3 retroactive RECs would start when both the request and the  
4 Audit Report are approved by the Energy Commission since  
5 WREGIS would not start the process without the Energy  
6 Commission approving the Audit Report.

7           Additionally, staff would like to clarify that if  
8 retroactive RECs are approved and created in WREGIS a POU  
9 may submit a revised compliance report to include the  
10 retroactive RECs prior to the final determination of REC  
11 eligibility for all LSEs.

12           Just to let you know that the Energy Commission  
13 already allows additional RECs to be retired within one  
14 year of the date of the initial submittal of the compliance  
15 period report. So that is not an issue in terms of if the  
16 RECs were created and you may have wanted to revise your  
17 compliance report.

18           The third one is to clarify that pre-  
19 certification applications for aggregated units are not  
20 allowed for the reason that an aggregated unit must be  
21 registered and approved in WREGIS when submitting an  
22 application, so facilities within the unit would have been  
23 commercially operational.

24           The fourth clarification is that daily delivery  
25 data may be requested as part of the reporting requirement

1 for common carrier pipeline for biomethane, depending on  
2 what's specified in the contract.

3           The fifth is on the nameplate capacity and staff  
4 is clarifying that the nameplate capacity of a facility in  
5 a certification application be consistent with the  
6 nameplate capacity registered in WREGIS. So staff is not  
7 proposing to redefine the nameplate capacity, but just  
8 merely to ensure that the name plate capacities being used  
9 are consistent.

10           The last clarification is on the facility  
11 location when submitting an application. And Christina can  
12 explain these changes in conjunction with the new RPS  
13 Online System.

14           MS. CRUME: All right, so the new online system  
15 will have a mapping feature built in. And for all  
16 facilities we will require the GPS points and a polygon  
17 drawn around the perimeter of the facility for solar PV  
18 facilities and wind facilities. This will be around either  
19 the panels or the turbines. For other facilities that are  
20 within one building, like a geothermal or a biomass, they  
21 would be around the building itself if there are more than  
22 one turbine within the facility. In the case of a water  
23 supplier conveyance you would just draw a portion where you  
24 would think each turbine would be.

25           MS. GREEN: And then moving on to the Interim

1 Tracking System, so initially when the workshop notice was  
2 released we had proposed to remove the extension of  
3 deadlines for POU's to use the ITS in Section III.A.2 of the  
4 guidebook since the deadline has passed, which is December  
5 2013. However, we understand that there may be limited  
6 circumstances where the ITS might still be useful. So we'd  
7 like to pose a question if we should continue using the ITS  
8 for limited circumstances, and if so, in what conditions?

9           And then finally, staff will incorporate the  
10 changes adopted by the Energy Commission last week on March  
11 9th at its Business Meeting that establish a process for  
12 POU's to move surplus retired RECs that were reported for a  
13 specified compliance period to the next, and updated the  
14 appeal section in Section VII.C of the guidebook to reflect  
15 recent amendments to Title 20 California Code of  
16 Regulations.

17           While these changes are now effective, staff  
18 would like to continue working with you to evaluate whether  
19 additional changes are appropriate. And if they are, staff  
20 would like to hear your proposed changes. Specifically on  
21 the process for moving RECs, staff would like to get your  
22 feedback if the limitation of one request for RPS  
23 compliance period is reasonable. And if not, should this  
24 requirement be modified or removed?

25           And that concludes my presentation. And we're

1 happy to take any comments or questions. So I'll post the  
2 questions here and if you have any comments or questions,  
3 please make sure to state your name and affiliation.

4 Go ahead, yes.

5 MR. PAPPAS: I'm John Pappas and I work for PG&E.  
6 Thank you for the opportunity to make some comments. And  
7 also, thanks for moving forward with these changes on the  
8 RPS Guidebook. For the most part I think they all are  
9 worthwhile and will help move along the RPS Program, but I  
10 do have a few questions.

11 One on the moving of the time limit for the  
12 retroactive RECs in WREGIS, moving it from 24 months to 12  
13 months, so if I understand it correctly it's the RECs  
14 cannot be created for any more than, at least right now, 24  
15 months prior to the date of the request?

16 MS. GREEN: Correct.

17 MR. PAPPAS: And then what you want to do is move  
18 it to 12 months. So the question I have is -- and we have  
19 a particular entity, which I know that the staff is aware  
20 of, which has worked for well over a year, if not longer,  
21 on creating these retroactive RECs going to all these  
22 different agencies throughout the country to get  
23 documentation that RECs were not created at these other  
24 places. And even prior to them beginning, they had to wait  
25 for this whole rule to get kicked in, so that they could

1 actually proceed on this process.

2           So I'm wondering is this something that would  
3 apply retroactively to them, because I think if it does  
4 there's a possibility that some of the RECs that they're  
5 seeking to create may fall outside that window. I don't  
6 know for sure. I don't think they're here, or are you  
7 looking to implement this prospectively?

8           MS. GREEN: Yeah, it's the latter. So because  
9 we're still trying to scope out the changes to the  
10 guidebook, so once it's adopted that would take effect from  
11 the adoption date. So any applications that are pending  
12 the current rules would apply.

13           MR. PAPPAS: Okay.

14           MS. GREEN: But it would be still 24 months.

15           MR. PAPPAS: Okay. So they would be fine,  
16 assuming the 24 months is fine, but I just want to make  
17 sure that's not being changed. Okay. That's good.

18           So okay, another question on the 90-day removal  
19 of the eligibility date requirement, which I would support  
20 for sure -- I just want to make sure I understand where  
21 we're going on that. When would be the limit then, or is  
22 there a limit, for an entity to then notify the CEC that --  
23 or to have filed their application? How does that exactly  
24 work?

25           MS. CRUME: So the facility will need to be

1 registered and approved in WREGIS before they can apply for  
2 certification. And then before you can claim any RECs you  
3 also must be certified. So those are the only real  
4 requirements we have, so we're just removing that 90-day  
5 requirement right in the middle.

6           So as long as you apply for a certification and  
7 are approved in WREGIS before you make any claims, you can  
8 count the generation abstract in WREGIS.

9           MR. PAPPAS: Okay. So but when do you have to  
10 apply for certification? So let's say you have your pre-  
11 certification, the thing operates on a certain date. Can  
12 you apply for certification six months later or is there  
13 any limit on that? That's what I'm wondering.

14           MS. CRUME: At this time, we're not proposing any  
15 limit. However, you cannot make any claims until you are  
16 certified. So if you expect to make a claim within the  
17 following compliance period or the following reporting  
18 year, you have to be certified first.

19           MR. PAPPAS: Okay. All right, that sounds good.  
20 Now, is there any opportunity to add topics to this list  
21 and how would that work?

22           MS. GREEN: Is it related to this topic? Or is  
23 it a new topic, because we have a section for the new  
24 topics. So we wanted to take all the comments related to  
25 the questions we raised and the proposed changes.

1 MR. PAPPAS: Okay. All right, I'll hold off on  
2 that.

3 MS. GREEN: Okay. Thank you.

4 MR. PAPPAS: All right. Thank you.

5 MS. GREEN: Any other commenters in the room? If  
6 not, we can go ahead and -- there's one in WebEx. Okay.

7 Go ahead. Can you please state your name?

8 MR. DENNIS: Yes. This is John Dennis. I'm the  
9 Director of Power System Planning and Development for the  
10 City of Los Angeles, Department of Water and Power.

11 LADWP appreciates -- we appreciate the  
12 opportunity to comment at this Scoping Workshop for the  
13 Guidebook. And we recognize the progression and the  
14 complexity of our system and the renewables that we're  
15 putting into the system. And we appreciate your continued  
16 guidance and oversight in this matter.

17 We would like to just -- you to consider the  
18 following for incorporation in the next edition of the RPS  
19 Guidebooks. Under the substantive changes the inclusion of  
20 the RPS Online System should only be included in the  
21 guidebook when the system has been thoroughly tested and  
22 user feedback has been incorporated.

23 Some of this comes from some lessons learned, but  
24 as it stands the online system is in its infancy and may  
25 require some enhancements before it can be fully utilized.

1 So we would request that you not prematurely include the  
2 RPS Online System into the guidebook.

3 Under the non-substantive changes, the CEC should  
4 modify the eligibility requirements for incremental  
5 generation to specifically include pump hydroelectric  
6 facilities. Currently the guidebook eligibility  
7 requirements are written to only accommodate efficiency  
8 upgrades for run-of-the-river hydroelectric facilities.  
9 And there should be additional eligibility requirements to  
10 accommodate efficiency upgrades for pump hydroelectric  
11 facilities.

12 Next, we would request that the CEC not request  
13 or require daily fuel and generation data for facilities  
14 using biomethane, because public release of this data could  
15 be detrimental to a utility. If market participants  
16 request this data from the CEC, and there's some CPRA  
17 Public Records Act request implications here, they could  
18 determine the heat rate for the generating facilities. And  
19 manipulate fuel and/or energy pricing to maximize profit  
20 and hurt the generator, the utility.

21 Next, at the Business Meeting on March 9th we  
22 made these comments, but the CEC adopted a resolution to  
23 allow POUs to move excess retired RECs to a future  
24 compliance period. We would request that CEC modify this  
25 process in the next guidebook to allow for utilities to

1 adjust REC claims up or down for compliance periods during  
2 the verification process.

3           The RPS compliance process should be likened to  
4 paying your taxes. You pay throughout the year and there's  
5 a true-up when you file your taxes. And at that point you  
6 should have the opportunity to either get a refund or pay  
7 to complete your tax obligation. So similarly, CEC should  
8 incorporate a REC true-up procedure for compliance periods  
9 in order to allow utilities to make a good faith effort to  
10 meet the RPS compliance targets in the most efficient  
11 manner. The CEC should also work with the stakeholders to  
12 streamline the RPS verification process, based on lessons  
13 learned from Compliance Period One.

14           Next, on the Interim Tracking System that should  
15 be used as a backup mechanism to WREGIS in order to allow  
16 utilities to claim RECs outside WREGIS in extenuating  
17 circumstances, such as delays in process for facility RPS  
18 certification or WREGIS registration. By combining WREGIS  
19 and CEC RPS track form claims, CEC can ensure that RECs are  
20 not double counted in claims if they do not exceed the  
21 annual meter data.

22           We do have some comments with regards to the  
23 particular questions that you ask. And if it's okay, I  
24 just have three notes on that; is that okay to proceed.

25           MS. GREEN: Go ahead, John.

1           MR. DENNIS: Sure, thank you. On question number  
2 one, about allowing the time reduced from 24 to 12 months,  
3 on question number one. Our answer or response to that is  
4 a creation of retroactive RECs should not be reduced to a  
5 12-month period, given the increase in renewable energy  
6 targets to 50 percent. The current 24-month allowed time  
7 is more flexible.

8           On question number three, regarding extension of  
9 certification, the extension of certification applications  
10 deadline should not be limited to two years. The extension  
11 of certification applications should be in line with the  
12 compliance period to ensure that utilities can certify  
13 resources that generated RECs for each compliance period.

14           And then lastly, on question number seven, about  
15 moving RECs. A POU should not be limited to one transfer  
16 request per RPS compliance period to withdraw or retire  
17 additional RECs during the verification process. This  
18 requirement should be removed to provide flexibility to a  
19 utility. The CEC should allow transfer requests until the  
20 completion of the verification process in order to allow  
21 full utilization of the RECs that have been procured.

22           We want to thank you for giving us the  
23 opportunity to provide these comments and in the  
24 stakeholder proposed topics at the end of the session I  
25 believe, we do have additional comments on those proposed

1 topics. But we'll wait until that point in the meeting.

2 MS. GREEN: Okay. Thank you.

3 MR. DENNIS: So thank you again for all your  
4 guidance and the opportunity to comment today and provide  
5 meaningful comments to the guidebook.

6 MR. TUTT: Good morning, Tim Tutt here, from  
7 SMUD. And I'm not as well prepared as John Dennis, from  
8 LADWP. I don't have specific responses to the questions.  
9 I have questions about the questions.

10 So first of all on question one, what's causing  
11 the proposed change to reduce from 24 months to 12 months  
12 again? Why is that even being considered?

13 MS. GREEN: So like I said we've implemented a  
14 couple of -- the process with a couple of applications.  
15 And with that request, we are realizing that it could bump  
16 into the 36-month rule and that's the main reason why we're  
17 proposing to reduce the time allowance, just because of  
18 that 36-month rule.

19 It's more of the WREGIS timing. And also how  
20 their process works, because after we process it here, it  
21 also has to be processed in WREGIS and so that takes  
22 another extra few months. And so with that, and with  
23 additional delays like one applicant requested for a time  
24 extension to submit an audit report -- we've required that  
25 report to be submitted within 90 days and that's three

1 months already.

2           So adding extra time and reviewing them and  
3 evaluating and approving and then forwarding it to WREGIS,  
4 we're really bumping into within one year of processing a  
5 request. So that's the main reason.

6           MR. TUTT: So is it fair to say that if it stayed  
7 at 24 months, that there might be some cases where you run  
8 into the 36-month retirement window, but in general there's  
9 more flexibility for all the cases where that doesn't  
10 happen. Does that make sense?

11           MS. GREEN: Yes. I think we're more concerned --  
12 depending on what vintage month and year they're requesting  
13 to be created, that's the main concern. So depending on  
14 how far back and if you're adding the process time, we  
15 could potentially using up the whole 36 months. If they're  
16 requesting the full 24 months, and then we're using the 12  
17 months to process it, even if it gets approved in WREGIS  
18 we're thinking it might bump into that 36-month or be  
19 outside that 36-month REC retirement rule -- that they may  
20 not be able to take advantage of those RECs.

21           MR. TUTT: Yeah.

22           MS. GREEN: And we realize that its costly and  
23 time consuming for both parties and staff, so we're just  
24 taking those into consideration.

25           MR. TUTT: Okay. And then on the second

1 question, I know that the current requirement of 90 days  
2 within commercial operations was adopted in the Eighth  
3 Guidebook and I think it's a good idea to support taking  
4 that requirement off. I think that provides more  
5 flexibility as I understand it, but when you say the  
6 facility is not certified by the utility reporting  
7 deadline, you're talking about which reporting deadline;  
8 the midsummer reporting deadline for an annual report or a  
9 compliance report?

10 MS. GREEN: Yeah. That would affect the  
11 verification report, yeah.

12 MR. TUTT: Okay. The verification report that  
13 you guys do, not to the -- you mean the utility annual  
14 reports or the compliance reports? So if a facility was  
15 not -- what if a facility has a commercial operation date  
16 within two months of the reporting deadline and they would  
17 have gotten 90 days beforehand, but only two months under  
18 this proposal; is that right?

19 MR. HERRERA: Potentially, Tim. This is Gabe  
20 with the Legal Office.

21 I mean that's a possibility, but let me ask you a  
22 question. I mean as we move forward I would think there  
23 would be less of a need for these special provisions that  
24 allow generators or applicants to get things done that  
25 perhaps should have been done sooner, right? There's going

1 to be, hopefully, less and less of that as we move forward  
2 and people become more familiar with the process and the  
3 CEC's rules etcetera. I mean, you know, additional  
4 education and so on. Is there, in your view, still a need  
5 for that 24-month period?

6 MR. TUTT: You mean that three-months period or  
7 the 12 --

8 MR. HERRERA: Well, actually my question was I  
9 started thinking about your first question, but it also  
10 applies to the three months, right? I think the three  
11 month, removing that three month provides more flexibility.  
12 But the 24 month in terms of retroactive RECs, I mean do  
13 you think that's still needed?

14 I know you guys were one of the folks that were  
15 affected, at least initially, that encouraged the Energy  
16 Commission to develop that rule, right?

17 MR. TUTT: Yes we did. We ended up not using it,  
18 as you know, but we had another avenue that worked better  
19 for us. And so I don't think that this is going to be used  
20 very often, either with 24 months or 12 months, so I'm not  
21 sure that making the change actually has any significant  
22 material effect.

23 What about a facility -- I'm going back to  
24 question two -- that's not certified by the reporting date,  
25 but actually for which the utility is not claiming any of

1 the generation for that report? So I mean, what's  
2 connection to the reporting date there?

3 MS. CRUME: The connection is that if you want to  
4 claim from a facility, it must be certified. So if the  
5 facility comes online two months before the reporting, but  
6 you're reporting for the prior year, this facility  
7 theoretically would not even be included in the report  
8 that's due the two months later. It's more saying that if  
9 you want to make any claims from generation, from this  
10 facility, it must be certified before you can include it in  
11 your report.

12 MR. TUTT: I see. So if you aren't claiming it  
13 in the report then this application, this doesn't apply?

14 MS. CRUME: Correct. I mean, theoretically you  
15 could come online and not claim for two years. And then  
16 apply for certification and it would have no bearing on it  
17 unless you're certified by the third compliance or the  
18 third year that you're trying to use.

19 MR. TUTT: On question three, are you seeing a  
20 lot of extension applications for certification --  
21 extension requests for certification applications? Or  
22 again, what's causing the proposal to limit it to two years  
23 if anything?

24 MS. CRUME: Yes, we are seeing a lot. And part  
25 of the limit on the years is also in part of the 90-day

1 removal. So if people miss their day by a couple days,  
2 they're no longer filling out a time-extension request,  
3 which is becoming more burdensome on both parties. And  
4 then the limit is because we want all facilities to be in  
5 WREGIS. And because WREGIS is more of a requirement, that  
6 is kind of our starting point.

7 MR. TUTT: So these mostly are facilities that  
8 are missing the 90-day window?

9 MS. CRUME: Yes.

10 MR. TUTT: I support continuing to use the ITS  
11 for limited circumstances, although I don't have any  
12 circumstances right now for which we would use it. I just  
13 think it's important to keep that flexibility option. And  
14 also, don't necessarily see any reason to limit the request  
15 of moving RECs to one request per compliance period. I  
16 don't think you're going to get very many of those requests  
17 in the first place, so I'm not sure that the limit really  
18 reduces workload or has any material effect other than  
19 reducing flexibility in the one or two cases where it might  
20 be needed.

21 Thank you.

22 MS. GREEN: Thanks, Tim. We do have one more  
23 commenter from WebEx.

24 MS. HARRELL: Hi. Can you hear me?

25 MS. GREEN: Yes

1 MS. HARRELL: Okay. Thank you. Good morning,  
2 I'm Badia Harrell on behalf of Pasadena Water and Power.  
3 And I just want to thank you first off for the opportunity  
4 to comment on these proceedings.

5 I'd like to address two issues. One of which  
6 would be the Interim Tracking System and the other would be  
7 the issue related to retroactive renewal RECs in WREGIS.

8 We understand that the deadline was extended  
9 through December 31st. But there may be instances when  
10 RECs are not created due to circumstances beyond our  
11 control.

12 And one example, for Pasadena, was that an error  
13 occurred between the QRE and the generating facility. And  
14 we were not made aware of that error until 90 days after  
15 generation, due to the WREGIS reporting lag. And then we  
16 were advised by the QRE that our generating facility had  
17 ten days to respond. And so we have the potential that our  
18 claims for the missing quantity of RECs may be deemed  
19 ineligible by the Energy Commission. And these were  
20 circumstances that frankly were not under our control.

21 And so I really just want to raise the question  
22 of how can we account for generation that we procured in  
23 good faith if the ITS process is no longer an option for  
24 us? So Pasadena definitely supports extending the ITS  
25 process.

1           And then the second issue that I'd like to bring  
2 up is in reference to the creation of retroactive RECs in  
3 WREGIS.

4           There's one piece that really sticks out in my  
5 mind. And it's the provision that talks about retroactive  
6 RECs shall be made only one for a generating facility or  
7 unit. That could potentially be problematic as we are  
8 required under SB 350 to procure at least 65 percent of  
9 long-term contracts.

10           So in other words, if I have a 20-year contract  
11 and they make a mistake Year 2, and now its Year 12 and  
12 they've made another mistake, and if that same generating  
13 facility is not allowed to use the retroactive provision  
14 again it could be problem-some.

15           And additionally, there are some generating  
16 facilities that have multiple counter parties. So let's  
17 say POU A had a mistake two years ago, and then Pasadena  
18 there's an issue that needs to be addressed; if that same  
19 facility is only allowed to do that once that could be  
20 problematic. So we'd just like to request that you kind of  
21 look at the provision and perhaps make some changes to,  
22 say, maybe once per year or once per compliance period, a  
23 generating facility can request the retroactive creation of  
24 RECs.

25           Thank you.

1 MS. GREEN: Okay. Thank you.

2 Badia, are you still there? I just have a quick  
3 question on your first point. In that scenario, would you  
4 be able to use the extension time request process?

5 MS. HARRELL: I'm not familiar with the extension  
6 time request process. I know we did attempt to use the ITS  
7 process. And we haven't heard anything. We understand  
8 that you are in Level 2 verification as we speak. Can you  
9 point me to that section in the guidebook and I can kind of  
10 maybe talk to you offline about that?

11 MS. GREEN: Sure, I believe it's on page 74.

12 MS. HARRELL: Okay.

13 MS. GREEN: And then also, I don't know if the  
14 retroactive REC request process would apply to that  
15 scenario. And that's on page 24 in the guidebook.

16 MS. HARRELL: Okay.

17 MS. GREEN: Not fully understanding the  
18 circumstance, I'm just trying to explore options for you to  
19 use.

20 MS. HARRELL: Right. Well, Lynette, would it be  
21 best to maybe set up a conference call with you at a later  
22 date to discuss this issue? I'd hate to really talk about  
23 it in the open with everyone else, but there is an issue  
24 for 2014 claims. And that's why I'm addressing it.

25 MS. GREEN: Sure.

1 MS. HARRELL: So I'll shoot you an email.

2 MS. GREEN: Okay. Thanks, Badia.

3 MS. HARRELL: Thank you.

4 MS. GREEN: Okay, Tim again?

5 MR. TUTT: Yes, hi. Thank you. One of the  
6 proposed substantive changes for which you didn't ask a  
7 question was the first one, Senate Bill 350, the new  
8 targeted MSW combustion eligibility? No question there,  
9 because you're just incorporating the 50 percent RPS target  
10 somehow --

11 MS. GREEN: Correct.

12 MR. TUTT: -- but not the compliance periods. So  
13 it's merely putting in something that says the RPS is now  
14 50 percent; is that right?

15 MS. GREEN: Correct. And that the MSW combustion  
16 is no longer -- we're no longer accepting new applications.

17 MR. TUTT: Okay. And then down on the non-  
18 substantive changes, you said that you're clarifying that  
19 pre-certification applications are not eligible or not  
20 available for aggregate units; is that right?

21 MS. GREEN: That's always been our process, our  
22 rule.

23 MR. TUTT: With the phased certification for  
24 those units, a pre-certification really all that necessary,  
25 I don't think, so okay. Because as I understand it you can

1 certify an aggregate unit and then add to it over time.

2 Otherwise --

3 MS. GREEN: Yeah, so you would amend your  
4 certified aggregate unit, if you increase your nameplate  
5 capacity or add -- or decrease your generating unit.

6 MR. TUTT: All right. And then I'm sorry, I  
7 missed what you were proposing to change for a common  
8 carrier pipeline biomethane?

9 MS. GREEN: So that relates to staff maybe  
10 requesting daily delivery data, in addition to the monthly  
11 requirement.

12 MR. TUTT: Okay. Yeah, I think I'd agree with  
13 John Dennis of LADWP that that's been a nightmare in the  
14 past. So I would hope that we don't go down that path.

15 And then on a facility location what I heard in  
16 part of the online tool is a mapping function that's going  
17 to require not just one GPS number, but something about  
18 going out to each corner of a facility or an array and  
19 mapping the coordinates of the entire structure? I guess  
20 my question is, is that really necessary?

21 MS. CRUME: Yes. The photovoltaic and the wind  
22 facilities are the primary issue that we are having where a  
23 facility -- most facilities that come in pick a GPS  
24 coordinate of a substation. And we don't know where the  
25 actual facility is, so we're unable to see if this facility

1 was already certified or if there's double counting. And  
2 being able to know more specifically where the facilities  
3 are would reduce that. And then also, when facilities  
4 change ownership, we would be able to just recertify the  
5 existing facility.

6 MR. TUTT: So if you just said that the GPS  
7 coordinates provided should not be the substation, but  
8 should be the center of the system or something like that,  
9 instead of requiring all four corners; would that work?

10 MS. CRUME: It only works in some cases. For  
11 some solar panels they are split over a couple acres. Same  
12 thing with wind facilities, how do you pick one turbine  
13 when there may be a hundred and they don't exactly come out  
14 to a square?

15 MR. TUTT: Yeah, I can see how it might be a  
16 polygon. In fact it might be separated polygons with  
17 another system in between and what do you do in that case?

18 MS. CRUME: Yes, and that's what we're talking  
19 about. So you would just plot both of the polygons, so we  
20 would know the ones say on the outside are the same  
21 facility and the one on the inside could be a different  
22 one.

23 MR. TUTT: So I mean, it strikes me that this is  
24 going to require for all of the facilities that you're  
25 talking about, somebody going out to the facility and doing

1 some GPS measurement at each corner if they don't have that  
2 data already.

3 MS. CRUME: It doesn't have to be exact to the  
4 GPS. You could look at on a Google Earth right now and be  
5 able to see the street corners. We're not asking down to  
6 the feet.

7 MR. TUTT: Okay. Thank you.

8 MS. GREEN: All right. I think we're going to  
9 open our phone lines. Is there anyone on the phone who'd  
10 like to speak?

11 MR. DENNIS: Yes, this is John Dennis from LADWP.

12 MS. GREEN: Hi, John.

13 MR. DENNIS: This is regarding the topics.  
14 Briefly, we have six quick items as far as proposed topics  
15 to consider.

16 The first item is on the SB 350 reduction in  
17 retail sales we'd like to ask for the CEC to add guidebook  
18 definitions for the terms "voluntary green pricing program"  
19 and "shared renewable generation program". Additionally,  
20 if the Commission could clearly define how POU's will be  
21 allowed to use these programs to reduce retail sales for  
22 RPS purposes as indicated in SB 350. CEC should also allow  
23 excess generation from rooftop solar installations to  
24 reduce the POU's retail sales. That's our first item on  
25 retail sales.

1           Second item just quickly, is on transportation  
2 electrification. We would ask that the CEC add a mechanism  
3 for granting RPS credit to utilities that invest in  
4 transportation electrification. As stated in SB 350  
5 "Light, medium, and heavy-duty vehicle electrification  
6 results in approximately 70 percent fewer greenhouse gasses  
7 emitted, over 85 percent fewer ozone-forming air pollutants  
8 emitted, and 100 percent fewer petroleum use."

9           So LA suggests the CEC create an RPS REC  
10 multiplier, which can be based on carbon intensity of  
11 gasoline fuels compared to the carbon intensity of  
12 utility's electric supply.

13           Third note on here is that the CEC should  
14 incorporate in the guidebook an acknowledgement and  
15 approval of economic dispatch, which is a widely utilized  
16 mechanism to dispatch fuel sources to generating facilities  
17 that use multiple fuel resources. And we've had some  
18 comments and discussion with your staff on that topic.

19           Fourth out of the six items is the RPS  
20 certification. If CEC should modify the RPS certification  
21 requirements to allow for the RPS eligibility of facilities  
22 to be evaluated based on the guidebook that was in effect  
23 at the time the resource was procured. The guidebook  
24 currently requires the facility applications to be  
25 evaluated based on the rules in effect at the time the

1 application is received by the CEC.

2           However, this requirement has proven to be  
3 problematic. Projects take multiple years to plan,  
4 construct and commission. And CEC eligibility guidebooks  
5 are modified on a yearly basis, as we're doing now. So  
6 utilities need assurance and the investor community, that  
7 when entering into procurement contracts for renewable  
8 energy, the utilities financial investment will be honored  
9 for RPS credit without risk of rules changing and RPS  
10 eligibility later denied.

11           Fifth, as far as grandfathering the CEC should  
12 modify the guidebook to specifically state that resources  
13 procured by a POU prior to the effective date of SBX1 2  
14 December 10th, 2011, which did not continue to be claimed  
15 after effective date of SBX1 2 be counted as part of the  
16 POU's resources for Compliance Period One.

17           And then lastly is the workshop material, CEC  
18 should consider publishing presentation materials for  
19 future workshops at least ten business days in advance.  
20 This will give the stakeholders ample time to review and  
21 provide thoughtful feedback as well as lead to a more  
22 fruitful conversation during the workshop.

23           I would just -- again lastly we want to thank you  
24 so much for the opportunity just to bring up these topics,  
25 to discuss them, and we do have big challenges that lie

1 ahead of us. We're right there at the halfway mark at 25  
2 percent. We're moving to 50 percent, but we do need to see  
3 that we have great diversity in our resource mix, both  
4 regionally in the technology types. And so we appreciate  
5 the guidebook reflecting that need for greater levels of  
6 complexity in our systems.

7 And we're available if you have any questions on  
8 these topics, but thank you for the opportunity.

9 MS. GREEN: Thank you, John. I think some of the  
10 items that you have brought up would be handled as part of  
11 the POU Regulations process, but we'll consider your  
12 comments on the certification or eligibility comments.

13 Thank you.

14 MR. DENNIS: Thank you.

15 MR. HERRERA: Yeah, Lynette, this is Gabe.

16 That's correct, John. Some of these items, some  
17 of the issues you brought up will be addressed as part of  
18 the amendments to the Energy Commission's POU RPS  
19 Regulations. And so work on those amendments will probably  
20 begin in earnest in a couple months, so stay tuned. You'll  
21 hear more from the Energy Commission on those.

22 MR. DENNIS: Okay. Thank you, very much. We  
23 appreciate that.

24 MS. GREEN: Yes?

25 MS. BERLIN: This is Susie Berlin. I had a quick

1 question for John. When he said the certification for  
2 facilities should be based on the eligibility guidebook in  
3 place at the time of -- and there was some interference,  
4 and I didn't catch the time of what exactly?

5 MR. DENNIS: At the time of the procurement.

6 So the guidebook currently requires the facility  
7 applications be evaluated based on the rules effective at  
8 the time that the application is received by the CEC. But  
9 this requirement has proven to be problematic. So projects  
10 take multiple years to plan, construct and commission. And  
11 the CEC eligibility guide books are modified on a yearly  
12 basis.

13 So we just need some assurance that when we enter  
14 into those procurement contracts, that our investments are  
15 honored without the risk of those rules changing.

16 MS. GREEN: Thank you. Are they still open, the  
17 lines? Yes, do we have any more comments from people from  
18 the phone?

19 (No audible response.)

20 Okay. Well, we've sort of started talking about  
21 the proposed topics, so anyone from the room here if you  
22 have any comments on new topics?

23 Go ahead Tim.

24 MR. TUTT: Tim Tutt from SMUD again. I guess a  
25 couple of things that I would say is I really appreciated

1 the amount of simplicity and simplification that went into  
2 the eighth version of the guidebook. And what I would hope  
3 to do is spend some time trying to suggest additional areas  
4 where it can be simplified, so it makes it a document  
5 that's easier to read and go through and find the key  
6 aspects. I'll take a look at that. I don't have anything  
7 specific right now.

8           And then secondly, it's still not clear to SMUD  
9 what exactly the eligibility date of distributed behind the  
10 meter generation is. We're hoping that it's January 1st,  
11 2011. And it's not anywhere written in the guidebook that  
12 we can see. So we're hoping for that clarification, either  
13 through the verification process for the first compliance  
14 period.

15           After all, we're well into the second. So we've  
16 got resources from back in January 1st, 2011 that we've  
17 claimed and we're not sure that they're going to be  
18 considered eligible. It does seem like maybe they are, but  
19 we're not sure. So that's the element of clarification I'd  
20 seek.

21           MS. GREEN: Thanks, Tim.

22           MR. PAPPAS: John Pappas from PG&E. So actually  
23 before talking about new topics, I just wanted to comment  
24 or follow up on some comments on the prior session.

25           In terms of the Interim Tracking System, PG&E

1 would also support continuing that. We don't have any  
2 particular circumstances at this point where an Interim  
3 Tracking System might be needed, but things always seem to  
4 come up. You have new players. Even though we are all  
5 getting much more familiar with everything, the generators  
6 and the counter parties, some of them are new and run into  
7 problems. And so the Interim Tracking System, I think has  
8 been useful, and on a limited basis we should probably keep  
9 it around.

10           Also, on this discussion about the 24 to 12  
11 months, you know, in terms of retroactive RECs -- and so I  
12 understand your concerns about the 36-month REC life. But  
13 I kind of view that as maybe being something that the  
14 generator has to worry about and I think they're aware of  
15 the 36 months. But giving them more flexibility and  
16 knowing that they know about the 36 months is I think is  
17 probably still better than moving it to 12. Because then  
18 effectively you may actually be, instead of giving them 36  
19 months, you might actually only be giving them say 20  
20 months or something like that in terms of being able to  
21 handle the problem. So I think it probably makes sense  
22 just to keep the existing one.

23           So just in terms of the new topics, I think just  
24 one general area, when we're talking about REC retirement  
25 processes or transferring RECs from one compliance period

1 to another or all those adjustments -- in fact the LADWP  
2 representative talked about the ability to true-up and all  
3 that. I just want to make sure that, first of all, that  
4 those changes, any changes that we do in those areas -- and  
5 I think that flexibility is probably a good idea -- that it  
6 applies to all retail sellers.

7           And we just had an exercise where -- with the I  
8 guess the ability to un-retire RECs where that kind of went  
9 through awfully quickly and it only applies to POUs. And  
10 we do understand the timing circumstances around that. But  
11 when it comes to reporting, retiring, all that stuff, all  
12 retail sellers whether they're POUs or IOUs, ESPs, or what  
13 have you it's really under the CEC's jurisdiction.

14           These are not questions that the CPUC, for us,  
15 can answer or opine on. They can give you an opinion, but  
16 in terms of the rules they have to be really in the  
17 guidebook. So I would strongly encourage that these types  
18 of changes are run through, in the guidebook, as opposed to  
19 just in the POU Regulations, because really this is the  
20 only place that you can make these changes for everyone.  
21 And so they should probably be made in the guidebook.  
22 And so hopefully the change that was just made, as far as  
23 the un-retirement of RECS, will find its way into this next  
24 edition of the guidebook.

25           But then other changes that we're talking about,

1 for example this limited one-time transfer, is that a  
2 change that's in the guide -- I don't seem to recall where  
3 that is. Is that in the guidebook or is that in the POU  
4 regs?

5 MS. GREEN: The one request per --

6 MR. PAPPAS: Compliance period.

7 MS. GREEN: That's in --

8 MR. PAPPAS: The verification period rather,  
9 yeah.

10 MS. GREEN: Oh, yeah. That's in the guidebook  
11 right now. Any additional RECs can be retired; is that  
12 what you're talking about or --

13 MR. PAPPAS: They can be.

14 MS. GREEN: -- the one time? Right, it's in  
15 there, yeah.

16 MR. PAPPAS: It's only for POUs then, right?

17 MS. GREEN: Yeah, it's only for POUs, the  
18 resolution.

19 MR. PAPPAS: Okay. So that's sort of another  
20 example. I think those types of things should be in the  
21 guidebook and they should apply to all entities.

22 MS. GREEN: So my understanding is that's more of  
23 a compliance issue for -- since you're talking about all  
24 LSEs, including retail sellers, IOUs.

25 MR. PAPPAS: Right.

1 MS. GREEN: It's more of the authority over --  
2 that's more of CPUC authority. And I believe we have a  
3 CPUC staff on WebEx. Maybe is Robert Blackney on WebEx,  
4 maybe he can respond to that question?

5 MR. BLACKNEY: Yeah, I am here. I'm sorry, one  
6 more time could I just get a brief download of the full ask  
7 here?

8 MS. GREEN: So the resolution that we just  
9 adopted last week on moving RECs from one compliance period  
10 to the next, PG&E is proposing to have that applied to all  
11 LSEs and not just the POUs. So do you have any response to  
12 that?

13 MR. BLACKNEY: We are taking a look at that.  
14 We're considering that in-house, but that will be managed  
15 by us. And I don't really have a determination one way or  
16 the other on how we will end up treating that. It is under  
17 consideration. I can tell you that much.

18 MS. GREEN: Okay. Thanks, Robert.

19 MR. PAPPAS: Okay. Thank you.

20 MS. GREEN: I think that's it for comments and  
21 proposed new topics.

22 So I think we're going to move on to the next  
23 steps in the guidebook schedule. And this is just a --  
24 right now it's tentative. So we have a written comments  
25 deadline by March 30th and after that we would consider all

1 your comments, oral comments and written comments. And  
2 then release a draft guidebook by early June.

3 And then obviously, we'll have another  
4 opportunity for the public to submit written comments two  
5 weeks after publication. And then our goal is to release a  
6 proposed final sometime in early September for a business  
7 meeting adoption in mid-September. So that's our current  
8 schedule.

9 And then just to remind you of our written  
10 comments we're now using the Energy Commission's e-  
11 commenting system, so just go to our website and the notice  
12 also provides instructions on how to submit your comments.  
13 And please remember to use the new Docket Number 16-RPS-01,  
14 when filing your comments.

15 Do you have a --

16 MR. GIBSON: Just a question on schedule, I had.  
17 Jed Gibson from Ellison, Schneider and Harris.

18 MS. GREEN: Good. Can you state your name  
19 please?

20 MR. GIBSON: Jed Gibson.

21 MS. GREEN: Thank you.

22 MR. GIBSON: With respect to the online system, I  
23 think you mentioned that that would be rolled out kind of  
24 at the same time as the guidebook was adopted? Or, okay,  
25 so we're expecting that would come out sometime in

1 September and will there be an opportunity for feedback on  
2 that online system?

3 MS. CRUME: Yes, as we develop the next phase,  
4 which is the certification application process, we will do  
5 our internal testing. And then we will have another focus  
6 group. And then we're planning on having another workshop,  
7 where people can come in and test both the account  
8 management piece and the certification piece of the  
9 database.

10 And then once Verification gets further along in  
11 their process, they will have the same type of thing.  
12 They'll have a focus group, so they could show the new  
13 verification process.

14 And then there will be an overall training as  
15 well, as well as a handout that will be posted both on the  
16 Internet and probably on the listserv. And then we will  
17 also have some type of training video to go along with that  
18 as well.

19 MR. GIBSON: Okay. Great, thank you very much.

20 MS. GREEN: Well, that concludes our workshop.  
21 If you don't have any other questions, I'd like to thank  
22 everyone for participating and thanks for coming.

23 And happy Saint Patrick's Day.

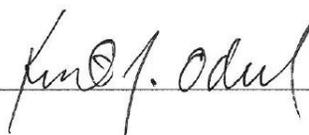
24 (Whereupon, at 10:39 a.m., the workshop  
25 was adjourned)

**REPORTER'S CERTIFICATE**

I do hereby certify that the testimony in the foregoing hearing was taken at the time and place therein stated; that the testimony of said witnesses were reported by me, a certified electronic court reporter and a disinterested person, and was under my supervision thereafter transcribed into typewriting.

And I further certify that I am not of counsel or attorney for either or any of the parties to said hearing nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 28th day of March, 2016.

A handwritten signature in cursive script, appearing to read "Kent Odell", is written over a horizontal line.

Kent Odell

CER\*\*00548

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I do hereby certify that the testimony in the foregoing hearing was taken at the time and place therein stated; that the testimony of said witnesses were transcribed by me, a certified transcriber and a disinterested person, and was under my supervision thereafter transcribed into typewriting.

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IN WITNESS WHEREOF, I have hereunto set my hand this 28th day of March, 2016.



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Myra Severtson  
Certified Transcriber  
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