# PUC_ColorSeal

**CPUC Energy Division**

**Renewable Procurement and Market Development Section**

**Updated June 2020**

**California Renewables Portfolio Standard Program**

**Compliance Reporting**

**Portfolio Content Category Classification Review Process Handbook**

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# Executive Summary

The Renewables Portfolio Standard (RPS) Portfolio Content Category (PCC) Classification Review Handbook provides retail sellers guidance on what information is required to substantiate each PCC classification implemented through CPUC Decision (D).11-12-052.

Energy Division staff will explain and update, where appropriate, the reporting spreadsheets that are used to substantiate retail seller PCC classification claims. Finally, Energy Division staff will provide process diagrams to illustrate the flow of information in Energy Division staff’s review process.

This Energy Division Portfolio Content Category Classification Review Handbook is organized into two main sections:

* Descriptions of PCC Classifications: Outlines the necessary criteria that must be met for RPS procurement to be claimed as one of the PCC classifications, as defined and implemented by D.11-12-052.
* Energy Division requirements for PCC claims: Describes the documentation required for retail sellers to demonstrate PCC classifications of RPS renewable energy credits (RECs). A process diagram for reviewing each PCC classification has been included.

# Descriptions of Portfolio Content Category Classifications

CPUC Decision (D).11-12-052 provides guidance to CPUC regulated retail sellers[[1]](#footnote-1) on how specific types of RPS procurement can meet the criteria for inclusion in each of the RPS portfolio content categories that apply to RPS procurement from contracts and ownership agreements executed after June 1, 2010. A different date applies for ESPs (January 13, 2011) and is subject to CPUC’s implementation of Public Utilities Code Section 399.16.[[2]](#footnote-2) For the purposes of the Energy Division Portfolio Content Category Classification Review Handbook, only the June 1, 2010 date will be referenced.

The following sections highlight the criteria and definitions for each of the PCCs pursuant to D.11-12-052.

## Definition of Portfolio Content Category 1 (PCC 1) - Facilities with First Point of Interconnection within a California Balancing Authority (CBA) or with Generation Scheduled into a CBA

Pursuant to D.11-12-052 (Ordering Paragraph 1), a retail seller claiming PCC 1 for RECs must provide information to Energy Division to demonstrate the generation facility from which the electricity is procured meets one of the following criteria:

* First point of interconnection to the Western Electricity Coordinating Council (WECC) transmission grid within the metered boundaries of a California balancing authority area.
* First point of interconnection with the electricity distribution system used to serve end users within the metered boundaries of a California balancing authority area.
* Generation from a facility that is scheduled into a California balancing authority without substituting electricity from any other source. If another source provides real-time ancillary services required to maintain an hourly or sub-hourly import schedule into the California balancing authority only the fraction of the schedule actually generated by the generation facility from which the electricity is procured may count toward this portfolio content category.
* Generation from a facility that is scheduled into a California balancing authority pursuant to a dynamic transfer agreement[[3]](#footnote-3)3 between the balancing authority where the generation facility is located and the California balancing authority into which the generation is scheduled.

Additional information regarding reporting requirements for PCC 1 claims can be found in section III.A-D.

## Definition of Portfolio Content Category 2 (PCC 2) -Incremental Electricity and Substitute Energy

Pursuant to D.11-12-052 (Ordering Paragraph 2), a retail seller claiming PCC 2 for RECs must provide information to the Energy Division to demonstrate all of the following:

* Buyer simultaneously purchases energy and associated RECs from the RPS-eligible generation facility without selling the energy back to the generator at the same time.
* Purchased energy must be available to the buyer, i.e., the purchased energy must not in practice be already committed to another party.
* Initial contract for substitute energy is acquired no earlier than the time the RPS-eligible energy is purchased, and prior to the initial date of generation of the RPS-eligible energy as stated in the contract.

Additional information regarding reporting requirements for PCC 2 claims can be found in section III.E.

## Definition of Portfolio Content Category 3 (PCC 3) -Electricity Products Not Qualifying as PCC 1 or PCC 2, Including Unbundled RECs

Pursuant to D.11-12-052 (Ordering Paragraph 18), any retail seller claiming PCC 3 for RECs, must provide information to Energy Division demonstrating that one or more of the following conditions are met:

* Procurement consists of unbundled renewable energy credits originally associated with electricity eligible for use in the California Renewables Portfolio Standard.
* Procurement consists of any generation eligible under the California Renewables Portfolio Standard that does not quality to be counted in either the portfolio content category described in Pub. Util. Code § 399.16(b)(1), or the portfolio content category described in Pub. Util. Code § 399.16(b)(2).
  + Example: RECs from a PCC 1 facility where meter generation is in excess of the e-Tag amount. The amount of metered generation in excess of the amount identified on the e-Tag cannot count as PCC 1 and would be counted in PCC 3.

Additional information regarding reporting requirements for PCC 3 claims can be found in section III.F.

## Definition of RECs Not Subject to Portfolio Content Category Classifications 1, 2 and 3 (PCC 0)

Procurement claims from contract/ownership agreements executed before June 1, 2010, are not subject to the PCC classifications established in D.11-12-052. For the purposes of RPS compliance, any eligible RPS RECs that are not subject to PCC 1, 2, or 3 will be placed in their own classification, which Energy Division staff categorize as PCC 0.

Pursuant to D.11-12-052, a retail seller claiming PCC 0 for RECs from a procurement contract or ownership agreement signed, or utility-owned generation in commercial operation before June 1, 2010, must provide documentation (see section III.G) to demonstrate that the original date of contract execution was prior to June 1, 2010.

If a contract or ownership agreement originally signed by a retail seller prior to June 1, 2010, is amended or modified after June 1, 2010, to increase the nameplate capacity or expected quantities of annual generation, it may not be considered PCC 0. However, the originally contracted procurement may be used for all compliance purposes, but the incremental procurement resulting from the amendment will be subject to PCCs 1, 2 and/or 3 depending on the delivery conditions of the amended contract.

Additional information regarding reporting requirements for PCC 0 claims can be found in section III.F .

# Description of Energy Division Requirements for Determining PCC Classification Claims and the Auditable Package

Retail sellers must provide detailed information to support each PCC claim for RECs retired[[4]](#footnote-4) and reported in annual and final RPS Compliance Reports. In addition, retail sellers must send WREGIS reports to the Energy Division each year. Together, this creates an “Auditable Package” for Energy Division staff to use in substantiating PCC claims of retail sellers and ultimately for determining RPS compliance. Retail sellers are required to submit a Final Verified Compliance Report for each compliance period, 30 days after the California Energy Commission issues its Final Verification Report for Retail Sellers.[[5]](#footnote-5)

The specific information required to complete the annual and final compliance review will depend on the PCC classification claimed by the retail seller, but consist of the following reporting documents:

* Energy Division RPS Compliance Report (required)
* Energy Division Hourly Meter and e-Tag Reconciliation Report (if applicable)
* Annual WREGIS e-Tag Summary Report[[6]](#footnote-6) and/or Energy Division RPS Hourly e-Tag Summary Report (if applicable)
* Annual WREGIS Compliance Report[[7]](#footnote-7) (required)
* RPS Procurement Contracts (required)

## RPS Compliance Report, Contract Details Tab

As part of the RPS Compliance Report, retail sellers must report contract information, regardless of the PCC classification, to the Energy Division staff in the “Contract Details” tab found in the RPS Compliance Report template.[[8]](#footnote-8) The Contract Details tab replaces the previous Static Contract Information tab/spreadsheet in its entirety.

Energy Division staff will verify procurement information reported in the Contract Details tab by reviewing contracts submitted to Energy Division. Depending on the PCC classification claimed by the retail Seller, Energy Division staff will require the review of RPS procurement contracts, interconnection agreements, dynamic scheduling agreements, and/or pseudo tie agreements. Retail sellers must update the Contract Details tab if any existing procurement contract is amended in a manner that may impact the PCC classification of RECs procured from that contract or facility.

Retail sellers are required to provide the following information in the Contract Details tab of the RPS Compliance Report spreadsheet: [[9]](#footnote-9)

* **LSE ID (Optional)**: Please input the retail seller’s internal ID number for the contract. If the retail seller does not maintain internal tracking contract ID numbers, please input “N/A.”
* **Reporting LSE Name**: Select the retail seller name from the drop-down list.
* **RPS Contract ID**: Enter the unique identification number of the RPS contract using the formula provided by Energy Division. To create a new RPS Contract ID for each contract, follow this format: LSE name abbreviation as specified in the drop-down list of "Reporting LSE Name" + 5-digit numbers (sequential) starting with "Technology Code Number." The technology code numbers are based on the technology type and are assigned as follows:
  1. Biogas: Landfill Gas, Biogas: Digester Gas
  2. Biomass, Biodiesel, Muni Solid Waste
  3. Geothermal
  4. Small Hydro, Conduit Hydro, Ocean/Tidal, Water Supply/Conveyance
  5. Solar PV
  6. Solar Thermal
  7. Wind
  8. REC Only
  9. Multiple Types
  10. Fuel Cell
  + Examples: PG&E Geothermal project: PG30045; SCE Wind project: SC70011; SDG&E Solar PV project: SD50001. This is a required field for all procurement reported.
  + For contract amendments or extensions, please add the corresponding amendment number to the end of the Contract ID. Examples: Pilot Power Group’s 5th Solar contract with one amendment: PPG50005-1.
  + Once the RPS Contract ID number has been generated, contracts must not be re-numbered. If the contract has stopped generating, LSEs should not re-number, and instead keep numbering in sequential order.
  + Non-IOU LSEs may use the RPS Contract ID Generator included in the “Technical Documentation” folder on the FTP site to assist in the creation of their new contract IDs.
* **Contract Execution Year:** Select the year the contract was executed from the drop-down list. If the facility is utility-owned generation (UOG), input the date the ownership agreement was originally executed or when ownership began. Retail sellers must provide a copy of the contract agreement (e.g. electronic copy of contract/agreement) to demonstrate the contract execution date. If the procurement originates from other programs such as Net Energy Metering (NEM) or Green Tariff Shared Renewables (GTSR) transfers, please select the first year where the LSE received RECs under these program originations.
* **Contract Name or Facility Name**: If using Facility Name, indicate the name of the facility, as specified on the CEC’s RPS facility search website,[[10]](#footnote-10) that generated the RECs that are being claimed for RPS compliance. If electricity products are purchased from a portfolio of assets, list all of the facilities. If the facilities are unknown, indicate unknown. If using Contract Name, please indicate the name of the contract as previously reported to the CPUC in prior Compliance Reports or the agreed upon contract name between contract counterparties.
* **Contract Status**: Select the contract or ownership agreement (UOG) status from the list of drop-down options. For IOUs’ UOG, NEM and GTSR procurement, select “CPUC approved.”
* **Facility Status**: Select the facility status (e.g. online, in development, etc.) of the project from drop-down options. For IOUs’ UOG, NEM and GTSR procurement, select “Online.” For RPS Sales, select “Online.”
* **Resource Type**: Select the type of RPS-eligible procurement from the list of drop-down options. If the contract has multiple technology types or an unknown technology type until the time of delivery, please select “Multiple Types.” This option may only be selected for contracts with future unspecified procurement. Any contracts that have multiple technology types across past and future years should separate out the procurement from that contract in separate rows using the same contract ID number.
* **Expected PCC Classification**: Select the expected PCC classification of the reported RECs.
* **Contract Length (Long/Short Term):** If the contract duration is less than 10 years, select “Short Term” and if the contract duration is more than 10 years, select “Long Term.”
* **Contract Length (Years):** Select the number of calendar years of RPS procurement that is derived from the contract.
* **Bundled/Unbundled:** Select whether the RECs are “bundled” or “unbundled” from the RPS energy under the contract.
* **Location by County, State, and Country**: Select the county, state and country that the facility is located in. If the project is located in California and spans multiple counties, please select “Multiple” from the drop-down list. Please input the Non-California county manually.
* **Contract Execution Date**: Input the date the contract was originally executed (mm/dd/yyyy). The date must match the execution date on the original procurement contract. Include the expected execution date for contracts under negotiation.
* **Commercial Online Date**: Input the Commercial Online Date specified in the RPS procurement contract (mm/dd/yyyy). If the facility or contract resource achieved COD earlier than the date specified in the contract, it is appropriate to provide the Actual COD and provide the COD specified in the contract (Guaranteed COD) for facilities not yet online. Include expected COD for projects under negotiation.
* **Delivery Term - Start Date**: Input the first date that electricity products were or will be procured by the retail seller (mm/dd/yyy) under the contract.
* **Delivery Term - End Date**: Input the last date that electricity products were or will be procured by the retail seller (mm/dd/yyy) under the contract.
* **Date of Most Recent Contract Extension / Amendment**: Input date that the original contract was extended or amended (mm/dd/yyyy).
* **Advice Letter #:** Input the AL number if the contract was approved through a CPUC AL. If the contract has been amended, retail sellers may populate this column with the AL # associated with the prior column, “Date of Most Recent Contract Extension/Amendment.”[[11]](#footnote-11)
* **Contract Volume / Contract Capacity**: Input the contract volume (MWh) and contract capacity (MW) specified in the RPS procurement contract.
* **Share of Total Facility Generation Under Contract (%):** Enter the share of total generation (between 0% and 100%) under the RPS contract that the retail seller will receive. If the contract does not have a set percentage of procurement from a resource (i.e. if contracts are delivering volumes from a pool of resources), LSEs may enter “Unknown.”
* **Contract Counterparty**: Indicate the seller of the RPS energy as specified in the contract. If the facility is utility-owned, state "UOG." If purchased from another load-serving entity, state the name of the load-serving entity.
* **Scheduling Coordinator**: Indicate the party responsible for scheduling the deliveries of RPS eligible electricity into a CBA, if applicable. If there is more than one party is designated as a “scheduling coordinator,” indicate only the primary scheduling coordinator.
* **Facility(ies) Directly Interconnected to a CBA**: Indicate if the facility is directly interconnected to a CBA by selecting “yes” or “no” from the drop-down menu. Select “yes” if the contracted facility(ies) is/are directly interconnected to a CBA, or “no” if the contracted facility(ies) is/are not directly interconnected to a CBA.
* **CBA(s) of Interconnection**: If the contract includes a facility that is directly interconnected to a CBA, select from the drop-down list the name of the CBA that the facility interconnects to. If the contract includes more than one facility or a portfolio of assets, and they are all located in a CBA, select the appropriate CBA. If the facilities under the contract are in different CBAs, select “Multiple.” If the contract is for unbundled RECs or does not include any facility that is directly interconnected to a CBA, select “N/A.”
* **Repackaged Contract**: Indicate if the contract has been repackaged, as defined in D.07-05-028, D.12-06-038 and D.17-06-026. If the contract is not repackaged, select “Not Applicable” from the drop-down list. If the contract is repackaged and the reporting LSE is the buyer, select “Repackaged – Buyer.” If the contract is repackaged and the reporting LSE is the seller, select “Repackaged – Seller.” A copy of both the repackaged contract and the original contract must be submitted to Energy Division.
* **Execution Date for Substitute Energy Agreement** (PCC 2 Only): Input the date the substitute energy agreement was originally executed.
* **Duration of Substitute Energy Agreement (PCC 2 Only**): Input the duration of the substitute energy agreement.

## RPS Contract Submission Process

* **Process for Secure RPS Contract Submission:**
* Each year, retail sellers must submit a zipped contracts file with two primary folders inside – a Confidential contract folder and a Public contract folder. If the contract has been terminated for a year or there have been deliveries under the contract for three years of more, whichever occurs sooner, the contract is automatically classified as public unless otherwise designated. All zipped contract files must be submitted through the CPUC’s secure file transfer protocol (FTP) addressed to [rpscompliance@cpuc.ca.gov](mailto:rpscompliance@cpuc.ca.gov).
* Within the confidential and public contract folders, there must be individual folders for each facility that contains all relevant contracts to that facility. Each individual folder containing all relevant contracts should be named as the facility or contract name itself (e.g. Pacific Wind Project).
  + - The relevant contracts include: the executed original power purchase agreements, amendments, and relevant energy agreements (e.g. substitute energy agreement or dynamic transfer agreement).
* Within the individual facility folders, each individual contract file should be named with the following naming convention:
  + Date of execution, facility name, type of agreement (e.g. **2010-04-14, Facility Name, PPA** or **2010-08-14, Facility Name, Amendment 1**).

## Requirements to Substantiate PCC 1 Claims from Facilities that Have a First Point of Interconnection within a California Balancing Authority

In addition to the information submitted in the Contract Details tab and a copy of the RPS contract(s), retail sellers must demonstrate that the facility’s first point of interconnection is within a CBA. If the retail seller’s contract does not specify a point of interconnection in a CBA, retail sellers can substantiate a direct interconnection by providing interconnection agreements demonstrating a first point of interconnection within a CBA, or by citing Federal Energy Regulatory Commission (FERC) dockets that illustrate a point of interconnection.

Lastly, in order to demonstrate a PCC 1 claim directly interconnected to a CBA, staff requires retail sellers to submit a copy of their WREGIS Compliance Report demonstrating the time frame which PCC 1 claims were generated and the facility source of generated amounts.

Energy Division staff may request additional information if the supporting documentation above is determined insufficient.

See Table III.B on the next page for an illustration of the Energy Division review process.

Table III.B. Energy Division Process for Reviewing Required Documents for PCC 1 Claims from Facilities that Have a First Point of Interconnection within a CBA



Compare Contract Details tab to WREGIS Compliance Reports to confirm:

Contract Details tab

Compare Contract Details tab to Contract and Interconnection Agreement to confirm:

Contract Details Tab

Contract Details Tab

Contract Details Tab

## Additional Documentation Required to Substantiate PCC 1 Claims from Facilities that Have Pseudo Tie Agreements to Deliver Generation into a CBA

In order for RPS-eligible resources from facilities with first point of interconnection outside a CBA, but delivered into CBA in real time through the use of a pseudo tie, a retail seller making a PCC 1 claim must demonstrate that the facility has engaged in the appropriate pseudo tie agreement to deliver the facility’s generation to a CBA.

Retail sellers must provide the following documents in order to substantiate PCC 1 claims from a facility delivering RPS electricity through a pseudo tie:

* + Power Purchase Agreements (PPAs) to specify the purchase of bundled RPS eligible electricity and RECs
  + A pseudo tie agreement (Interconnected Control Area Operating Agreement) between the balancing authority which the contracted RPS eligible facility is located, and the CBA where energy is to be delivered
  + A pseudo tie agreement (Pseudo Participating Generator Agreement) between the RPS eligible facility and CAISO
  + WREGIS Compliance Report

As the use of pseudo tie agreements evolve, additional forms of documentation may be included.

See table III.C on the next page for additional information on CPUC review process.

Table III.C.1. CPUC Process for Reviewing Required Documents for PCC 1 Claims from Facilities that Have Pseudo Tie Agreements to Deliver Generation into a CBA



Compare Contract Details tab to WREGIS Compliance Reports to confirm:

Compare Contract Details tab to Contract and Pseudo Tie Agreement to confirm:

Contract Details Tab

Contract Details Tab

Contract Details Tab

## Requirements to Substantiate PCC 1 Claims for RPS-Eligible Electricity Dynamically Scheduled or Scheduled into a CBA on an Hourly/Sub-hourly Basis

The PCC 1 classification includes procurement of energy and RECs from an RPS-eligible facility, where the electricity is scheduled into a CBA without substituting electricity from another source. Because ancillary services are ­often used to maintain an hourly or sub-hourly import schedule into a CBA, the final scheduled amount of electricity as indicated on an e-Tag may be larger than the actual generation amount from the RPS facility. Only the fraction of the schedule actually generated by the RPS eligible facility, procured by the retail seller and scheduled into a CBA may be classified as PCC 1. [[12]](#footnote-12)

Similarly, RECs will be created for all generated output from the RPS eligible facility, including generation that exceeds the schedule. However, only the fraction of the generation that meets the schedule will be classified as PCC 1.

In D.11-12-052, the CPUC specified that a retail seller may claim PCC 1 RECs from resources with dynamic transfer agreements[[13]](#footnote-13) provided that, “the generation from that facility is scheduled into a California balancing authority pursuant to a dynamic scheduling agreement between the balancing authority where the generation facility is located and the California balancing authority into which the generation is scheduled.”[[14]](#footnote-14)

The auditable package for PCC 1 claims scheduled into a CBA, including those with a dynamic scheduling agreement, includes the following information:

* Power Purchase Agreement (PPA) specifying the purchase of bundled RPS eligible electricity and RECs
* The WREGIS e-Tag Summary Report, and/or RPS Hourly e-Tag Summary Report for e-Tags that are not reported through WREGIS, is used to synthesize important e-Tag information for Energy Division’s PCC classification process.[[15]](#footnote-15) The information included in the WREGIS e-Tag Summary Report, and/or the RPS Hourly e-Tag Summary Report, should match the information found on individual retail seller NERC e-Tags.[[16]](#footnote-16) The following information is required for all e-Tags, either in the WREGIS e-Tag Summary Report or the RPS Hourly e-Tag Summary Report:[[17]](#footnote-17)
  + e-Tag Identification number: Input the identification number (e-Tag Code) assigned to the e-Tag for the e-Tag query period.
  + Start Date: Input the start date and time for energy flow during the e-Tag query period.
  + Stop Date: Input the stop date and time for energy flow during the e-Tag query period.
  + Generator Name as listed on e-Tag: Input the name of the source facility generating the RPS eligible electricity as it appears on the corresponding e-Tag. For the first compliance period only, if there is another source listed, the retail seller must provide a written explanation as to why this is the case and how staff can determine that the amount or percentage of the amount on the e-Tag is attributable to the specific RPS facility. Staff will evaluate the explanation to determine if the claim or a portion of the claim can be classified as PCC 1. For the second compliance period and forward, the source on the e-Tag must be the RPS-certified facility for which the PCC 1 claims are made.
  + Load as listed on e-Tag: Input the “Load” point that is registered with NERC as the “Sink Point” (aka Sink, Last Point of Delivery, POD) and listed on the e-Tag. In order to count as PCC 1 the “Load” point must be within a CBA.
  + Load Control Area (LCA) as listed on e-Tag: The LCA must represent generation scheduled into a CBA. LCAs that are not CBAs or are not located in CBAs should not be included. Generation amounts that are associated with LCAs that are not in a CBA, or cannot be located within a CBA, will not be classified as PCC 1.
  + Generator Control Area (aka Generator Balancing Area) on the e-Tag: For PCC 1 claims, this must be the Generator Control Area or the balancing authority where the RPS renewable energy resource is located
  + Total MWh on e-Tag for the time period: Input the total MWh (up to four decimal places) of RPS eligible electricity scheduled into a CBA.
  + Used MWh: Input the MWh amount of e-Tag scheduled electricity that has been successfully matched with RECs tracked in WREGIS. The “Used MWh” amount should not be higher than the sum of the lesser of the hourly generation and hourly final schedule amounts for the timeframe on the e-Tag, but may include the accumulated kWh.[[18]](#footnote-18) No more than what was generated by the RPS-certified facility and which met the final schedule should be matched per e-Tag.
  + MWh Remaining: Input the MWh amount of e-Tag scheduled electricity that has not been successfully matched with RECs tracked in WREGIS.
  + Importing Entity: The RPS ID for the Purchasing/Selling Entities (PSE) as listed on the “Importing Entity” line of e-Tag with. The “Importing Entity” must RPS ID must also be listed in the “Miscellaneous Token Field RPS\_ID” field.
  + Miscellaneous Token Field RPS\_ID: Input up to 10 Miscellaneous Token Field RPS\_ID values associated with the physical delivery path of RPS procurement delivered into a CBA.
  + Comments: For e-Tags associated with RECs tracked through WREGIS, input the “WREGIS Certificate Serial Numbers” for any RECs in WREGIS subaccounts.
* The Hourly Meter and e-Tag Reconciliation Report spreadsheet, complete with:
* Date (mm/dd/yyyy)
* Hour Ending
* E-Tag ID Number: This field the identification number for the e-Tag. In the case of multiple e-Tags per hour, report e-Tag information on its own row.
* Final e-Tag Schedule (MWh): Input the total amount of MWh from the Final e-Tag Schedule. Retail sellers may include four decimal points on MWh figures if they are converting procurement from kWh.
* RPS Facility’s Hourly Meter Data (MWh): Input the amount of MWh generated by the contracted RPS facility during the corresponding hour(s) on the e-Tag. Retail sellers may include four decimal points on MWh figures if they are converting procurement from kWh.
* Percent Share of Schedule: Enter the procuring entity’s percentage share of the total e-Tag schedule amount. If the procuring entity is entitled to the entirety of a facility’s e-Tag schedule amount, enter 100%.
* Percent share of facility’s output: [[19]](#footnote-19) This field, which is calculated, determines procuring entity’s percentage share of the facility’s hourly generation amount.
* Retail Seller Contract Reference Number or Contract ID Number.
* Eligible PCC 1 Volume: This field, which is calculated, determines the amount of MWh eligible for PCC 1 classification by comparing the retail sellers share of the final hourly schedule amount (“Final e-Tag Schedule (MWh)” times “Percent Share of Schedule”) and the “Allocated Hourly Meter Amount.”

See table III.C.2 on the next page for an illustration of the Energy Division review process.

Table III.C.2. Energy Division Process for Reviewing Require­­­­d Documents for PCC 1 Claims from Facilities Scheduling Electricity into a CBA on an Hourly or Sub-Hourly Basis



Compare Contract Details tab to Contract and Dynamic Transfer Agreement to confirm:

Compare Contract Details tab to WREGIS Compliance Reports to confirm:

Contract Details Tab

Contract Details Tab

Contract Details Tab

## Requirements to Substantiate PCC 2 Claims Using Substitute Energy to Firm and Shape

For facilities with a first point of interconnection outside a CBA and importing substitute energy, retail sellers must substantiate that substitute energy was delivered into a CBA within one calendar year. Specifically, retail sellers must provide the Energy Division with a WREGIS e-Tag Summary Report and/or RPS Hourly e-Tag Summary Report to substantiate the delivery of system energy into a CBA in the required timeframe.

Table III.D. Energy Division Process for Reviewing Required Documents for PCC 2 Claims Using Substitute Energy to Firm and Shape



Compare Contract Details tab to Contract to confirm:

Compare Contract Details tab to WREGIS Compliance Reports to confirm:

Contract Details Tab

Contract Details Tab

Contract Details Tab

## Requirements to Substantiate PCC 3 Claims

Substantiation of PCC 3 claims will require the review of procurement contract or ownership agreement to verify the date of execution, and the date/terms of contract amendments or modifications, including the purchase of RECs and the total amount of RECs purchased.

Table III.E. Energy Division Process for Reviewing Required Documents for PCC 3 Claims



Compare Contract Details tab to WREGIS Compliance Reports to confirm:

Compare Contract Details tab to Contract to confirm:

Contract Details Tab

Contract Details Tab

Contract Details Tab

## Requirements to Substantiate PCC 0 Claims

Verification of PCC 0 claims will include a review of the contract/ownership agreement to verify the date of execution, the date/terms of contract amendments or modifications, that the RPS-facility met the Energy Commission’s certification rules that were in place at the time, and other information as determined necessary.

All contractual information for PCC 0 REC claims must be reported in the “Contract Details” tab in the Annual and Final RPS Compliance Report spreadsheet and supported with a copy of the executed contract.

Table III.F. Energy Division Process for Reviewing Required Documents for PCC 0 Claims



Compare Contract Details tab to Contract to confirm:

Compare Contract Details tab to WREGIS Compliance Reports to confirm:

Contract Details Tab

Contract Details Tab

Contract Details Tab

# Timing for Retail Sellers to Submit Supporting Documentation for PCC Classification Claims

In accordance with the California Energy Commission’s RPS Eligibility Guidebook[[20]](#footnote-20) all retail sellers must submit WREGIS Compliance Reports and WREGIS e-Tag Summary Reports to the California Energy Commission and to Energy Division annually on July 1. WREGIS reports – both Compliance and e-Tag Summary – should include all generation and retirement information for the preceding year.

Additional documentation that is required to substantiate PCC classification claims shall be submitted to Energy Division with the annual RPS compliance filing on August 1.[[21]](#footnote-21) Please see the table below for a list of information that needs to be submitted to Energy Division on August 1 for each PCC classification.

| **PCC Classification Documentation Required** | |
| --- | --- |
| PCC Classification Claimed | Documentation Required Annually on August 1 |
| PCC 1 - Directly Interconnected to a CBA | * A digital copy of the executed contract sent to the CPUC’s secure FTP addressed to [rpscompliance@cpuc.ca.gov](mailto:rpscompliance@cpuc.ca.gov). * An updated “Contract Details” tab in the annual Compliance Report, that includes new entries for any contract that has been executed through the August 1 of the reporting year (e.g. contracts executed through August 1, 2020 for 2019 reporting, etc.). * A demonstration of direct interconnection to a CBA. See Section III.B of this report for more detailed information. |
| PCC 1 - Dynamic Transfer: Pseudo Tie | * A digital copy of the executed contract sent to the CPUC’s secure FTP addressed to [rpscompliance@cpuc.ca.gov](mailto:rpscompliance@cpuc.ca.gov). * An updated “Contract Details” tab in the annual Compliance Report, that includes new entries for any contract that has been executed through the August 1 of the reporting year (e.g. contracts executed through August 1, 2020 for 2019 reporting, etc.). * A demonstration of pseudo tie agreement with a CBA (Interconnected Control Area Operating Agreement and Pseudo Participating Generator Agreement). See Section III.D of this report for more detailed information. |
| PCC 1 - Dynamic Transfer: Dynamic Schedule | * A digital copy of the executed contract sent to the CPUC’s secure FTP addressed to [rpscompliance@cpuc.ca.gov](mailto:rpscompliance@cpuc.ca.gov). * An updated “Contract Details” tab in the annual Compliance Report, that includes new entries for any contract that has been executed through the August 1 of the reporting year (e.g. contracts executed through August 1, 2020 for 2019 reporting, etc.). * A digital copy of the dynamic transfer agreement to deliver RPS electricity to a CBA (Dynamic Imports Operating Agreement and Dynamic Scheduling Agreement) * An Hourly Meter and e-Tag Reconciliation Report listing all MWh that are being claimed under PCC 1. * An RPS Hourly e-Tag Summary Report for any e-Tags that are not reported and matched within the WREGIS e-Tag report. This report may also report e-Tags with clerical errors, e.g., including the wrong RPS ID in the Misc. field. |
| PCC 1 - Scheduled on an Hourly or Sub-Hourly Basis | * A digital copy of the executed contract sent to the CPUC’s secure FTP addressed to [rpscompliance@cpuc.ca.gov](mailto:rpscompliance@cpuc.ca.gov). * An updated “Contract Details” tab in the annual Compliance Report, that includes new entries for any contract that has been executed through the August 1 of the reporting year (e.g. contracts executed through August 1, 2020 for 2019 reporting, etc.). * An RPS Hourly Meter and e-Tag Reconciliation Report listing all MWh that are being claimed under PCC 1. * An RPS Hourly e-Tag Summary Report for any e-Tags that are not reported and matched within the WREGIS e-Tag report. This report may also report e-Tags with clerical errors, (e.g., including the wrong RPS ID in the Misc. field.) |

|  |  |
| --- | --- |
| PCC Classification Claimed | Documentation Required Annually on August 1 |
| PCC 2 | * A digital copy of the executed contract sent to the CPUC’s secure FTP addressed to [rpscompliance@cpuc.ca.gov](mailto:rpscompliance@cpuc.ca.gov). * An updated “Contract Details” tab in the annual Compliance Report, that includes new entries for any contract that has been executed through the August 1 of the reporting year (e.g. contracts executed through August 1, 2020 for 2019 reporting, etc.). * An RPS Hourly e-Tag Summary Report for any e-Tags that are not reported and matched within the WREGIS e-Tag report. This report may also report e-Tags with clerical errors, e.g., including the wrong RPS ID in the Misc. field. |
| PCC 3 | * A digital copy of the executed contract sent to the CPUC’s secure FTP addressed to [rpscompliance@cpuc.ca.gov](mailto:rpscompliance@cpuc.ca.gov). * An updated “Contract Details” tab in the annual Compliance Report, that includes new entries for any contract that has been executed through the August 1 of the reporting year (e.g. contracts executed through August 1, 2020 for 2019 reporting, etc.). |
| PCC 0 | * For PCC 0 claims, all IOUs will need to make a submission of all contracts executed before June 1, 2010 and include the contract in the “Contract Details” tab of the annual RPS Compliance Report. * For PCC 0 claims, all CCAs/ESPs will need to make a submission of all contracts executed before January 13, 2011. See sections II.D and III.F of this report for additional information. |

# Appendix A: Matrix of Revisions Incorporated in the PCC Classification Methodology

Revisions are based on stakeholder feedback provided through informal comments provided on the revised PCC Staff Proposal that was served to the R.11-05-005 service list on February 14, 2014.

| **Matrix of Revisions to the PCC Review Methodology – 2014** | | | |
| --- | --- | --- | --- |
|  | Commenting Party | Change Requested | Energy Division Solution |
| e-Tag Summary Report | PG&E | The definition of "Used MWh” indicates the “Used MWH” amount should not be higher than the sum of the lesser of the hourly generation and hourly final schedule amounts for the timeframe on the e-Tag, but may include the accumulated kWh. PG&E seeks clarification of the meaning of “accumulated kWh” in this context. | A footnote has been added on p. 14 to clarify the definition of “Used MWh.” |
| SDG&E | The Excel spreadsheet provided does not include the “Miscellaneous Token Field RPS\_ID” field listed in the Proposal. | The e-Tag Summary spreadsheet has been modified to include this field. |
| Meter and e-Tag Reconciliation Report | PG&E | Although on page 10 (now page 12 and 13) of the PCC Proposal provides the option to complete the RPS Hourly e-Tag Summary Report or to submit the WREGIS e-tag summary report, paragraph 1 of the instructions for the Hourly e-Tag Summary Report requires that the report be submitted for all out-of-state resources. These instructions should be amended to state that either the WREGIS report of the Hourly e-Tag support can be submitted. Should this information need to be submitted as proposed, PG&E suggests creating separate tabs for each year, to keep the size of each tab manageable, if more than one year is reported in a single report. | Each REC reported by a retail seller needs to be represented in either the WREGIS e-Tag Summary Report or RPS Hourly e-Tag Summary Report. Energy Division staff have modified the instructions for the Hourly e-Tag Summary Report. |
|  | PG&E | Should delineate when each of the tabs should be populated. E.g., hourly meter and e-tag reconciliation form should explicitly state that the form should only be populated for projects that are outside of CA and seeking PCC 1 status through a dynamic transfer agreement and/or scheduling arrangement | Timing information is covered in section IV of this report. |

|  | Commenting Party | Change Requested | Energy Division Solution |
| --- | --- | --- | --- |
| Meter and e-Tag Reconciliation Report | PG&E | PG&E suggests that this report include separate tabs for each year to keep the size of each tab manageable. | Energy Division have modified the “Meter and e-Tag Reconciliation Report” spreadsheet instructions to instruct retail sellers to include one tab per year. |
| Procurement Detail Tab | PG&E | Although the instructions for the “Fixed Volume Contract Amount (MWH) indicate that this field only relates to contracts where a retail seller has contracted for a fixed volume basis, if this field is left blank, the “Percent Share of Facility Output (%)” in the column H, “Allocated Meter” in the column I and “Eligible PPC 1 Volume” in the column K immediately to the right becomes zero. This seems to be a formula error, as these columns should only come into play if there is a non-zero value. The formula should be revised so that a null value in the “Fixed Volume Contract” column doesn’t impact the PCC 1 calculation. | The formula “Procurement Detail” spreadsheet tab that calculates “Fixed Volume” has been modified according to PG&E’s suggestion. |
| Review of PCC 1 | PG&E | As discussed in PG&E’s introductory observations above, the PCC Proposal appears to require that dynamic transfer contracts that are not grandfathered would have to provide all the hourly metering/e-Tag forms required of non-dynamically transferred PCC 1 out-of-state generation. The RPS Statute treats dynamically transferred output as distinct from out-of-state generation that is imported without a dynamic transfer | Contracts with dynamic schedules are required to provide an “Hourly Meter and e-Tag” analysis, however, contracts that use pseudo ties to deliver electricity do not need to provide an “Hourly Meter and e-Tag” analysis. This is discussed in greater detail in Appendix B. |
| Iberdrola | Recommends staff review dynamic transfers section. Iberdrola does not believe that a retail seller could execute a substitute energy agreement and then not receive energy. | Contracts with dynamic schedules are required to provide an “Hourly Meter and e-Tag” analysis, however, contracts that use pseudo ties to deliver electricity do not need to provide an “Hourly Meter and e-Tag” analysis. This is discussed in greater detail in Appendix B. |
| Review of PCC 2  Review of PCC 2 | PG&E | The bottom dash in the first box in the auditable package chart on page 15 indicates the for IOUs, the need to confirm that substitute energy agreements have to be “longer than five years.” D.11-12-052 at page 50 states that a “substitute energy contract procured by an IOU for PCC 2 products must be “at least 5 years in duration.” Therefore, the above phrase in the first box on page 15 should be changed to “5 years or longer.” | Energy Division staff have modified the language for the PCC 2 process diagram. |
| PG&E | The second dash in the lower box in the auditable package chart on page 15 indicates the need to confirm that substitute energy needs to be delivered “within one calendar year” of REC generation. D.11-12-052 at page 77 (Ordering Paragraph 2) states that substitute energy for PCC 2 products must be delivered into California and matched with RECs in WREGIS within the “same calendar year.” Therefore, the above phrase in the lower box on page 15 should be changed to “within the same calendar year” to comport with the decision. | Energy Division staff have modified the language for PCC 2 process diagram (at p. 17). |
| SDG&E | Change proposal language for PCC 2 to reflect that an agreement must run for "minimum of five years, or the length of the contract for RPS-eligible energy, whichever is shorter." | Energy Division staff have modified the language in the PCC 2 sections (at p. 16) |
| Static Contract Information Tab | SDG&E | The Excel spreadsheet provided does not include the following fields listed in the Proposal: “Type of Procurement Arrangement,” “Retail Seller Contract Reference Number, or Contract ID Number,” and “Facility Source Name.” | The “Static Contract Information” tab has been modified to include the fields listed. |
| PG&E | “Retail Seller Contract Reference Number” field: PG&E notes that this field is not one of the columns in the Static Contract Information tab. | The “Static Contract Information” tab has been modified to include this field. |
| PG&E | “Facility Source Name” field: PG&E notes that this field is not one of the columns in the Static Contract Information tab. Additionally, the instruction does not indicate what to do if interconnected directly to a CBA. | The “Static Contract Information” tab has been modified to include this field. |
| PG&E | Location (County and State, or Country if outside US): PG&E recommends providing City, County, State, and Country as separate fields, for consistency with “Procurement Detail” tab, the PDSR and the RPS Database. Additionally, PG&E recommends splitting this into separate fields to ease exporting and importing into various databases. These fields should all be consistent with RPS Database and PDSR, in that, contracts with multiple facilities should input “Multiple” for these fields. This field should also allow the response “TBD” if not yet determined. | Additional columns have been added to the “Static Contract Information” tab and the “Static Contract Information” tab instructions/data definitions have been modified. |
| Static Contract Information Tab | PG&E | “CBA(s) of Interconnection” field: PG&E suggests renaming this field and using “Balancing Authority” data field from the PDSR and the RPS Database. | The name of this field has been modified and the possible data validations include all balancing authorities in the WECC. |
| PG&E | PG&E proposes clarification on how to report data for contracts for energy from multiple facilities when the facilities do not all have the same information. PG&E proposes that for contracts to purchase energy from a small number of specific facilities, the IOU provide multiple values separated by commas, if the data type for the column allows. For contracts with a large number of facilities or an undefined or unlimited set of facilities (e.g. REC transactions), the utility should state “Multiple.” | Numerous data definitions have been modified to include various/multiple as an option (see p. 6-7). |
| PG&E | “Resale Agreement” field: PG&E recommends Energy Division clarify the definition of Resale Agreement. It is unclear to PG&E that if the Resale Agreement is referring to PCC 2 firming and shaping agreements, or the traditional “resale” in which previously procured RECs are resold to a third party. | The “Static Contract Information” tab instructions/data definitions have been modified to provide more clarity. |
| PG&E | “Owner/Seller” field: PG&E suggests renaming this field and using “Primary Developer Name” data field from the PDSR and RPS Database. | A footnote has been added to note that this field is the same as the corresponding field in the IOU Monthly database document (see p.7). |
| PG&E | “Technology” field: PG&E recommends adding “Various” or “Multiple” option in the drop-down list to capture unbundled RECs from various RPS-eligible resources. | The “Technology” data field definition has been modified (at p. 7) within the “Static Contract Information” tab spreadsheet. |
| SCE | “Resale” field: The Static Contract Information tab should offer options for both resale (sell) and resale (purchase) agreements. | The “Static Contract Information” tab instructions/data definitions have been modified to provide more clarity. |

# Appendix B: Matrix of Revisions Incorporated into the RPS Compliance Report template

Revisions are based on stakeholder feedback provided through informal comments sent to the R.18-07-003 service list in response to the Energy Division RPS Reporting Workshop held on February 27, 2020.

| **Matrix of Revisions to RPS Compliance Reporting Process and Templates – 2020** | | | |
| --- | --- | --- | --- |
|  | Commenting Party | Change Requested | Energy Division Solution |
| Compliance Reporting: Process | Joint IOUs, Public Advocates Office, Joint CCAs | Joint CCAs propose that Energy Division (ED) staff release draft versions of the templates early enough in the reporting cycles to allow parties to identify errors or recommend improvements.  Joint IOUs propose that ED should provide RPS Compliance Report templates by June 1 each year with no revisions allowed after the template has been provided. Public Advocates Office and Joint CCAs support this proposal. | Energy Division (ED) staff will release draft version of the templates at least 2.5 months before August 1. There will be a two-week informal comment period, and the final templates will be posted no later than July 1. |
| Compliance Reporting: Process | Joint IOUs | Joint IOUs propose that ED staff should clarify that the Renewable Net Short (RNS) calculations and the Siting and Permitting Status of RPS Projects tables should only be submitted with the annual Procurement Plans and not the annual Compliance Reports. | Staff clarify that the RNS calculations should only be submitted with the Procurement Plans. All retail sellers must submit information on the Siting and Permitting of new RPS resources in their Narrative Report within the annual Compliance Report, pursuant to Public Utilities Code Section 399.13(a)(3). |
| Compliance Reporting Webinar | Joint IOUs, Public Advocates Office, Joint CCAs | Joint CCAs and Joint IOUs propose annual RPS Reporting and Process Webinars with ED Staff to provide a forum where retail sellers may ask questions on requirements and processes. Public Advocates Office supports this proposal. | Staff will hold annual webinars to discuss compliance reporting at least one month before the compliance reporting deadline. |
| Compliance Report Template | SF PUC (CleanPowerSF) | SF PUC (CleanPowerSF) propose reducing the number of sheets where data is entered in the Compliance Report due to difficulties in tracking and correcting errors. | Staff has limited the sheets where data must be input in the Compliance Report to three tabs (e.g. Unique Inputs, Contract Details, REC Retirements). Staff has also included a Data Entry Guide for retail sellers to use when populating the Report. |
| Compliance Reporting: General | Shell, AReM/UC Regents, CASMU | Shell, AReM/UC Regents and CASMU propose eliminating paper submissions of the annual Compliance Reports (and supporting documents) due to the administrative burden. | Staff will eliminate the requirement for paper submissions of the annual Compliance Report and will only require electronic submissions. |
| Compliance Report Template | Shell, CASMU, AReM/UC Regents, Joint CCAs, Joint IOUs | Shell and CASMU assert that the Static Contract Information Report (SCI) is duplicative of the Contract Details (CD) tab and propose eliminating the SCI. AReM/UC Regents suggest modifying the columns in the CD tab to get more information from what is reported within the SCI. Joint IOUs and Joint CCAs support this proposal. | Staff has added several columns from the SCI to the CD tab to get more contract-specific information for PCC review and will no longer require a SCI. |
| Compliance Report Template | AReM/UC Regents, CASMU | AReM/UC Regents and CASMU propose eliminating the Narrative Report because all of the information required can be found in the Contract Details tab. | No change. PU Code 399.13(a)(3) requires LSEs to include with their Compliance Reports:  1. Current status and progress toward RPS procurement requirements, including, if applicable, the status of any necessary siting and permitting approvals from renewables procured by the retail seller, and the current status of compliance with the portfolio content requirements of subdivision (c) of Section 399.16, including procurement of eligible renewable energy resources located outside the state and within the WECC and unbundled RECs.  2. Recommendations to remove impediments to making progress toward achieving the RPS requirements.  3. For IOUs only: Progress made in upgrades to transmission and distribution facilities and other electrical system components it owns to interconnect renewables and to supply the electricity generated by those resources to load, including the status of planning, siting, and permitting transmission facilities by federal, state, and local agencies.  Narrative Reports continue to be required to provide data on items #2 and 3 as required for compliance with PU Code 399.13(a)(3).  Staff has modified #1 in the Compliance Report Instructions tab - a narrative for this item is only required if the retail seller is awaiting siting/permitting approvals from local/state/federal agencies for new RPS projects. |
| Compliance Report Template | CASMU | CASMU proposes that areas in the reporting templates where confidentiality may be claimed should be clearly identified in the template. | Staff believes this is unnecessary, and that the confidentiality of the information should be requested by the retail seller on a case by case basis (i.e. each year). Some retail sellers may choose to not claim confidentiality of their procurement information for transparency purposes (i.e. in 2019, 13 CCAs did not claim confidentiality of their compliance information). |
| Compliance Report Template: RPS Progress Summary tab | CASMU | CASMU provides a table that shows the redundant data shown in multiple tabs of the Compliance Report. | Staff has eliminated the RPS Progress Summary tab, which shows the same information as the Procurement Details tab. |
| Compliance Reporting: General | Shell | Shell argues that all retail sellers’ historical RPS procurement information should be uploaded to a centralized data warehouse where this information would be available to Energy Division. | Staff is currently working to expand the existing RPS Database to include all retail sellers’ Compliance Report submissions. |
| Compliance Report Template:  Unique Inputs, Accounting, Contract Details, Procurement Details, REC Retirements tabs | Joint IOUs, Joint CCAs, Shell, AReM/UC Regents, CleanPowerSF, Public Advocates Office, CASMU | Joint IOUs, Joint CCAs, Shell, AReM/UC Regents, CleanPowerSF, Public Advocates Office, and CASMU argue that the Compliance Reports should not include historical compliance period data that has already been verified by the CPUC. | Staff has eliminated all historical compliance period information in the Compliance Report template, with the exception of the Compliance Period 2 Excess Procurement Bank and 2014-2016 retail sales in the Unique Inputs tab. |
| Compliance Report Template: Contract Details, REC Retirements tabs | CleanPowerSF, Joint IOUs | CleanPowerSF proposes that since RPS contract data is also collected through the IRP proceeding, a contract ID number should be added for RPS resources so the datasets can be joined. Joint IOUs do not object but defer to the IRP/RPS alignment process. | An “RPS Contract ID” field has been added to the Compliance Report template for retail sellers to utilize a unique CPUC ID number for the RPS contracts reported. This RPS Contract ID number is the same as the one used monthly RPS database submissions. See pp. 6 of this handbook for more information on how to create the ID number. |

# Appendix C: Additional Information About Dynamic Transfers

**Energy Division Rationale for Separating Dynamic Transfers into Two Categories: Pseudo Ties and Dynamic Transfers**

In the first version of the staff proposal, Energy Division proposed that all dynamic transfer agreements should be subjected to an hourly meter/e-Tag analysis to ensure the metered energy was entering a CBA. This methodology was met with some opposition from retail sellers who noted that the CEC Guidebook allows RECs from procurement contracts with dynamic transfer agreements to be verified through the same process as an “in-state resource”- i.e. Energy Commission policy allows staff to verify the dynamic transfer agreements without an hourly meter/e-Tag analysis.

Energy Division consulted with R.11-05-005 stakeholders and with the ISO to determine if PCC 1 claims that use dynamic transfers to deliver electricity into a CBA required the review of hourly e-Tag information and meter data. Consequently, Energy Division staff have determined that there are two distinct types of dynamic transfers that each merit special treatment.

The first type of dynamic transfer agreement that can be used to deliver electricity into a CBA is a pseudo tie agreement. Pseudo-ties are a special type of inter-balancing authority transaction whereby a generator that physically resides outside the contiguous boundaries of a CBA is linked to a CBA so that the point transfer for the generation is analogous to a direct interconnection to the CBA. Under a pseudo tie agreement, the CBA assumes all responsibilities as scheduling coordinator for the facility.

The second type of dynamic transfer agreement that can be used to deliver electricity into a CBA is a dynamic scheduling agreement. Dynamic Scheduling occurs when two balancing authorities are linked, allowing them to request and acknowledge desired schedule changes and is able to dynamically transmit a revised schedule as changes (planned or unplanned) in energy production or demand occur. With a dynamic schedule agreement, the CBA does not assume a responsibility as the scheduling coordinator for the facility, and electricity will only reach a CBA if the retail seller, the generator, or a third party is responsible for scheduling the electricity into the CBA. Consequently, the RPS eligible electricity will not actually reach the CBA unless the energy is scheduled.

Therefore, Energy Division staff has determined that a Pseudo Tie Agreement demonstrates sufficient interconnection to a CBA, and an hourly meter/e-Tag analysis is not necessary. Dynamic Schedule agreements, however, do not delegate scheduling coordinator responsibilities to the CBA of delivery and require the RPS eligible electricity to be scheduled into CBA by the retail seller (or other third party). Consequently, Energy Division staff must perform an hourly meter/e-Tag analysis for all dynamically scheduled PCC 1 claims to ensure the RPS eligible electricity is properly scheduled into a CBA.

As the use of pseudo ties and dynamic schedules evolve, additional forms of documentation may be required for Energy Division staff’s review. [[22]](#footnote-22)

1. Retail sellers include investor-owned utilities (IOUs), electric service providers (ESPs), and community choice aggregators (CCAs). [↑](#footnote-ref-1)
2. Assembly Bill (AB) 2187 (Bradford), Stats. 2012, Ch. 604. [↑](#footnote-ref-2)
3. See the CAISO’s Dynamic Transfer page for more information: <http://www.caiso.com/participate/Pages/DynamicTransfers/Default.aspx> [↑](#footnote-ref-3)
4. Retire means to commit a renewable energy credit tracked in the WREGIS tracking system for compliance with the RPS program. [↑](#footnote-ref-4)
5. See D.12-06-038 for more information on the Final Compliance Report process and the CEC’s verification website for more information: <https://www.energy.ca.gov/portfolio/documents/rps_verification_retailsellers.html> [↑](#footnote-ref-5)
6. WREGIS e-Tag Reports are generated through the WREGIS website. For additional information on WREGIS e-Tags Reports and how to submit this information to Energy Division, please reference the [CEC Guidebook 9th Edition](http://docketpublic.energy.ca.gov/PublicDocuments/16-RPS-01/TN217317_20170427T142045_RPS_Eligibility_Guidebook_Ninth_Edition_Revised.pdf). [↑](#footnote-ref-6)
7. WREGIS Compliance Reports are generated through the WREGIS website. For additional information on WREGIS Compliance Reports and how to submit this information to Energy Division, please reference the [CEC Guidebook 9th Edition](http://docketpublic.energy.ca.gov/PublicDocuments/16-RPS-01/TN217317_20170427T142045_RPS_Eligibility_Guidebook_Ninth_Edition_Revised.pdf). [↑](#footnote-ref-7)
8. Annual Compliance Report spreadsheet templates can be found on the CPUC [RPS website](http://www.cpuc.ca.gov/General.aspx?id=3856), under the “RPS Compliance & Reporting” header. [↑](#footnote-ref-8)
9. For the IOUs (PG&E, SCE and SDG&E) various fields listed here are analogous to the fields reported in the RPS Database “Monthly Submittal” file. [↑](#footnote-ref-9)
10. <https://rps.energy.ca.gov/Pages/Search/SearchApplications.aspx> [↑](#footnote-ref-10)
11. Retail sellers may provide the AL associated with the latest contract amendment, if applicable, and not the AL that approved the original contract. [↑](#footnote-ref-11)
12. Including contracts with generating resources that have dynamic transfer agreements. [↑](#footnote-ref-12)
13. Rules and information related to CAISO’s dynamic transfer tariffs is provided in this proposal document. [Dynamic Transfers Final Proposal](http://www.caiso.com/Documents/FinalProposal-DynamicTransfers.pdf) (May 2011) [↑](#footnote-ref-13)
14. D.11-12-052, Ordering Paragraph 1 [↑](#footnote-ref-14)
15. Retail sellers are required to document all e-Tags through either the WREGIS e-Tag Summary Report, or RPS Hourly e-Tag Summary Report for e-Tags that are not reported through WREGIS. Retail sellers do not need to report an e-Tag in both reports. [↑](#footnote-ref-15)
16. The North American Electric Reliability Corporation (NERC) is the entity responsible for the implementation of the electricity tagging process. An e-Tag is an electronic record that contains the details of a transaction to transfer electricity from a seller to a buyer where the electricity is scheduled for transmission across one or more balancing authority area boundaries. [↑](#footnote-ref-16)
17. CA RPS Hourly e-Tag Summary Report spreadsheet templates can be found on the CPUC [RPS website](http://www.cpuc.ca.gov/PUC/energy/Renewables/index.htm), under the “Recent Documents/Updates” header. [↑](#footnote-ref-17)
18. A retail seller may enter up to four decimal points when populating the “Used MWh” field. The four decimal points account for accumulated kWh that are associated with a given e-Tag. Typically, these kWh would be rounded down to the nearest MWh, however, Energy Division staff have decided to allow retail sellers to include the additional kWh when reporting their e-Tags. [↑](#footnote-ref-18)
19. Energy Division staff understand that some retail sellers have RPS contracts to purchase a fixed volume of RPS generation, per hour, as opposed to a percentage share of the facilities per hour output. Consequently, Energy Division staff have included an extra tab within the Hourly Meter and e-Tag Reconciliation Report spreadsheet (the “Fixed Volume Calculation” tab) for retail sellers to calculate a percentage share value for fixed volume RPS contracts. [↑](#footnote-ref-19)
20. The latest edition of the California Energy Commission RPS Eligibility Guidebook can be found here: <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard-0> [↑](#footnote-ref-20)
21. Pursuant to D.12-06-038 the Director of Energy Division has the authority to grant an extension to the annual compliance filing. [↑](#footnote-ref-21)
22. See the CAISO’s Dynamic Transfers page <http://www.caiso.com/participate/Pages/DynamicTransfers/Default.aspx> and the Process Guidelines page <http://www.caiso.com/Documents/Process_Guidlines-DynamicTransfers.pdf> for more information. [↑](#footnote-ref-22)