

L. Jan Reid Cross Examination Exhibit 1

Response of the Joint Parties to Question 1 of Discovery Set 4

R.07-05-025
Phase III
Direct Access Issues

Fourth Set of Discovery Requests
to AReM

Q 1. The Joint Parties (JP) of which AReM is a member, state that “LSEs demonstrate RPS compliance through a process of retiring Renewable Certificates tracked through the Western Renewable Energy Generation Information System (WREGIS).” (JP Reply Testimony, p. 13)

A. Do the Joint Parties contend that RPS compliance is determined by WREGIS?

Response:

No.

B. If the Joint Parties answered affirmatively to Question 1A, please provide a citation to the California Public Utilities Commission (CPUC) decision where regulatory authority over RPS compliance was transferred from the CPUC to WREGIS.

Response:

N/A

C. If the Joint Parties believe that the state legislature transferred regulatory authority over RPS compliance from the CPUC to WREGIS, please provide a citation to the state law or Public Utilities Code section concerning the transfer of regulatory authority.

Response:

N/A