From: Redacted

Sent: 7/17/2012 5:05:08 PM

To: Blackney, Robert (robert.blackney@cpuc.ca.gov) (robert.blackney@cpuc.ca.gov)

Cc: Allen, Meredith (/O=PG&E/OU=Corporate/cn=Recipients/cn=MEAe); Mathaijackson, Grady (Law) (/O=PG&E/OU=Corporate/cn=Recipients/cn=MGML);

Redacted Simon, Sean A.

(sean.simon@cpuc.ca.gov) (sean.simon@cpuc.ca.gov); Redacted

Redacted

Bcc:

Subject: RE: RPS 20% Closing Report

Robert

Thank you for the opportunity to review and comment. Please find below PG&E's comments on the latest Closing Report Template. We would be happy to discuss this further if you have additional questions.

## Procurement Detail Tab

- 1) Rows 17 and 18 are redundant and should be removed, however, doing so would also require various adjustments that will need to be made elsewhere in the template. Rows 13 and 14 are also redundant.
- 2)Row 9 Needs to include amounts from "TRECs Approved and Delivered Prior to March 11, 2010" (Row 12). The formula needs to be revised.
- 3) Row 12 -
- > Title should be changed to "TRECs Approved and Delivered Prior to March 11, 2010"
- > The formula for year 2010 mistakenly pulls in the figures for bundled rather than TREC
- > The formula for years 2003-2009 have an error reference in the formula.
- 4) Row 13
- > Year 2010 is hardcoded as "0". It should be linked to the 25% of APT calculation from the Accounting Tab.

5) Rows 20 and 21
> Rows should deleted as the "June 1, 2010" date is relevant to the 33% regime and not the 20% program.
6) Minimum Contract Requirement comment box- what does the reference to Column Y mean? Should this be replaced with Column O? Also, in the last sentence in the TRECs section, March 11, 2010 should be replaced with March 10, 2010.
7) Column N – Similar to the Row 12 change above, the dropdown choice titled "TRECs approved Prior to March 11, 2010" should be revised to "TRECs Approved and Delivered Prior to March 11, 2010".
8) Column O – "Contract Length"
> Remove "n/a- TRECS Pre-June 2010" and "n/a Post-June 2010" options from dropdown menu and replace with "n/a - TREC signed or approved after March 10, 2010" to make consistent with the Minimum Contracting Requirement comment box.
We would be happy to discuss this further if you have additional questions.
Thank you,
Redacted
From: Blackney, Robert [mailto:robert.blackney@cpuc.ca.gov]  Sent: Friday, July 13, 2012 03:55 PM  T(Redacted  Cc: Simon, Sean A. <sean.simon@cpuc.ca.gov>; Allen, Meredith; Redacted  Grady (Law); Redacted  Subject: RE: RPS 20% Closing Report</sean.simon@cpuc.ca.gov>
Hello

Energy Division staff have reviewed your proposed changes, and has made some adjustments to the Closing Report template.

Some of the notable changes include:

- Changed title to "PROVISIONAL CLOSING REPORT FOR CALIFORNIA RENEWABLES PORTFOLIO STANDARD 20% PROGRAM"
- Changed classification information within the procurement Tab (most notably column N and O) to reflect procurement classifications of the 20% program
- Removed redundant TREC/TREC banking information from the summary section of the Procurement Detail tab (located at top of the worksheet most notably removed "Adjusted TREC Procurement Pre Bank" and "Adjusted TREC Procurement Post Bank" totals)

Before issuing the final draft to the R.11-05-005 Energy Division staff would like to allow PGE a second opportunity to review the Closing Report template. Please find attached the revised version of the drafted Closing Report for your review.

Please feel free to contact Robert Blackney (<u>rb3@cpuc.ca.gov</u> – 415.868.5506) with any questions, comments or concerns related to the RPS 20% Closing Report. All feedback related to this drafted version of the RPS 20% Closing Report must be received no later than 5:00pm on Tuesday, July 17, 2012 for consideration by Energy Division staff.

Thanks,

Robert Blackney | Renewable Energy Policy & Procurement California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102 Telephone: 415.703.3072

Robert.Blackney@cpuc.ca.gov | www.cpuc.ca.gov

From:  Sent: Tuesday, July 03, 2012 3:53 PM  To: Blackney, Robert  Cc: Simon, Sean A.; Allen, Meredith; Redacted Mathai-jackson, Grady (Law); Redacted  Subject: RE: RPS 20% Closing Report		
Robert		
Thank you for the opportunity to review and comment. PG&E has the following comments on the RPS 20% Closing Report template:		
1. The contract classification categories 1, 2 and 3 identified in column N and summed in Rows 20 through 22 of the "Procurement Detail" tab should be removed since they do not apply to pre-2011 RPS procurement. The contract classification categories in column N should be:		
a. Bundled Procurement		
b. TREC Approved Prior to March 11, 2010		
c. TREC (approved on or after March 11, 2010)		
2. Some additional changes you may want to consider include:		
a. The "Adjusted Total TREC Procurement - Pre Bank" category (Row 12 of the "Procurement Detail" tab) is not needed since earmarking from future years back to 2010 is no longer applicable.		

b. Similarly, the "Adjusted Total TREC Procurement - With Bank" category (Row 13 of the "Procurement Detail" tab) is not needed since 2010 is the only year in which the TREC limit applies and thus there would be no TREC Surplus Procurement Bank to bring forward from 2009 or earlier.

Please let me know if you have any further questions.

Thanks!

Pacific Gas and Electric

Redacted	
Redacted	

From: Blackney, Robert [mailto:robert.blackney@cpuc.ca.gov]

Sent: Tuesday, June 26, 2012 06:02 PM

To: MBoldyreva@semprautilities.com <MBoldyreva@semprautilities.com>; Laura.Genao@sce.com

<Laura.Genao@sce.com>; Allen, Meredith; Simon, Sean A. <sean.simon@cpuc.ca.gov>

Cc: sballesteros@semprautilities.com <sballesteros@semprautilities.com>; Sergio.lslas@sce.com

<<u>Sergio.lslas@sce.com</u>>; Redacted

Subject: RPS 20% Closing Report

Hello Everyone,

With the Commission's recent passage of Decision D.12-06-038, Energy Division will be requesting all California Retail Sellers submit a closing report for compliance years 2003-2010. This report will be due by close of business on Monday, August 20, 2012.

Before Energy Division issues a final report template, staff would like to get some feedback on a drafted version of the reporting template. Please find a drafted version of the RPS 20% Closing Report attached for your review. Please note that this version is a draft only, and an official final version of the report will be issued to the service list once all feedback has been processed by Energy Division staff.

Please feel free to contact Robert Blackney (<u>rb3@cpuc.ca.gov</u> – 415.868.5506) with any questions, comments or concerns related to the RPS 20% Closing Report. All feedback related to this drafted version of the RPS 20% Closing Report must be received no later than 5:00pm on Tuesday, July 3, 2012 for consideration by Energy Division staff.

Thank you,

Robert Blackney | Renewable Energy Policy & Procurement California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

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Robert.Blackney@cpuc.ca.gov | www.cpuc.ca.gov