From: Schultz, Adam

Sent: 12/6/2012 10:39:15 AM

To: Allen, Meredith (/O=PG&E/OU=Corporate/cn=Recipients/cn=MEAe)

Cc:

Bcc:

Subject: RE: SPI RECs associated with on-site generation

Thanks, Meredith. This is good. I'll let you know if anyone in the building has any follow-ups.

Adam C. Schultz, J.D. | Renewable Energy Policy & Procurement California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102 Telephone: 415.703.2692

Adam.Schultz@cpuc.ca.gov | www.cpuc.ca.gov

----Original Message----

From: Allen, Meredith [mailto:MEAe@pge.com] Sent: Thursday, December 06, 2012 10:00 AM

To: Schultz, Adam

Subject: Re: SPI RECs associated with on-site generation

Hi Adam,

A description of the WREGIS process and CEC certification is below.

Please let me know if you have questions or need additional information.

Thanks, Meredith

SPI RECs - WREGIS Tracking Process

The SPI RECs (WREGIS Certificates) are created using behind-the-meter generation serving onsite load at the Anderson, Burney, Lincoln, and Quincy Sierra Pacific Industries (SPI) facilities. The onsite load portion of each facility's generation is separately tracked from the portion exported to the grid. The onsite load generation is registered separately in WREGIS and has been assigned the following WREGIS IDs:

Anderson Onsite Load - W1733 Burney Onsite Load - W1734 Lincoln Onsite Load - W1735

Quincy Onsite Load - W1736 & W1755 (there are two generators at Quincy, one at 20 MW and one at 7.5 MW)

The Qualified Reporting Entity which reports meter data to WREGIS for the purpose of creating WREGIS Certificates is Trimark Associates, Inc. - www.trimarkassoc.com<
http://www.trimarkassoc.com/>. Trimark uses the following process to determine the onsite load amount reported to WREGIS each month. Trimark meters the gross generation at each generator, and then subtracts out parasitic loads and generation exported to the grid. Finally, Trimark further adjusts (reduces) the resulting onsite load to account for transformer losses to get to the high side of the transformer.

The above listed facilities and WREGIS processes are the same as those used to provide 2010 unbundled RECs to SDG&E, approved earlier this year (AL-2357E and approved by Resolution E-4536).

CEC Certification

The CEC has certified each of these facilities as RPS eligible and assigned them the following CEC RPS ID numbers:

SPI Anderson - 60086A SPI Burney - 60087A SPI Lincoln - 60088A SPI Quincy - 60089A

On Dec 4, 2012, at 10:45 AM, "Schultz, Adam" <adam.schultz@cpuc.ca.gov>> wrote:

Hi Meredith,

Just wanted to follow up with our call from yesterday.

Judith Ikle had asked me about the process for verifying RECs associated with on-site generation, to ensure there isn't double-counting, etc. I know that WREGIS tracks this, and the CEC must deem the source an eligible renewable resource, etc.

But Judith, and now Ed Randolph, have both asked if I could provide some background on how these RECs associated with generation consumed on-site are verified since there's no transmission of energy involved that can be measured.

Let me know if you can assist. I may also call the CEC to get their input.

Thanks, Adam

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