

November 30, 2012

California Energy Commission
Attn: Lorraine Gonzalez, Energy Specialist
Renewable Energy Office
1516 9th Street
Sacramento, CA 95814

RE: Comments on SB X1-2 RPS Reporting and Verification Working Group Meeting Held
November 30, 2012

Iberdrola Renewables (“Iberdrola”) appreciates the opportunity to comment today, and thanks staff from the California Energy Commission (CEC) and the Energy Division of the California Public Utilities Commission (CPUC) for their ongoing efforts to resolve RPS verification and compliance issues. The November 30, 2012 working group meeting held at the Energy Commission indicated several key issues requiring further attention:

- a. Devise appropriate reporting tools for varying compliance purposes – inventorying “grandfathered” renewable assets in the portfolios of Publically Owned Utilities (POUs), Energy Service Providers (ESPs), and Investor Owned Utilities (IOUs); categorizing new contracts in the applicable product content category (PCC); and tracking/verifying compliance. It remains unclear how the Excel spreadsheet presented to the working group will be deployed (and modified, as necessary) to help with before as well as after-the-fact verification of PCC claims.
- b. Utilization of these reports and clear verification tools to track key project and contractual information and also to give buyers and sellers confidence that the fulfillment of such transactions will enable all buyers to comply with the PCC requirements of Public Utilities Code Section 399.16.
- c. Develop rules that provide up-front guidance for buyers and sellers that the contracts they enter into—approved by the CPUC or by POU governing boards—will meet specified criteria for the intended PCC category.
- d. Resolution of several technical issues, particularly the use of Inter-scheduling coordinator trades (ISTs).

Iberdrola Renewables, LLC
1125 NW Couch St., Suite 700
Portland, OR 97209
Telephone (503) 796-7000
www.iberdrolarenewables.us

Enhancing up-front verification:

Iberdrola asserts the spreadsheet presented by staff, with modifications should be especially useful to regulators in assessing existing assets that contribute to RPS compliance. It would also provide a foundation of information to the CEC, now tasked with significant RPS compliance responsibility for the POUs.

What is less clear is whether this format may provide a useful role in signaling to buyers and sellers the expectations of the regulatory bodies for procurement of resources that meet the PCC requirements of the RPS law. As a seller of renewable energy products in California, Iberdrola has encountered significant uncertainty among all three types of purchasers (POUs, ESPs, and IOUs) over the requirements for meeting each of the product content categories. That uncertainty manifested itself in comments during the November 30 working group meeting.

It is virtually unheard of in any other RPS market within which Iberdrola operates (more than a dozen at present) that a required RPS compliance measure is not afforded upfront confirmation from the primary regulators that the electricity product does — or does not — meet the requirements. California’s RPS verification process, as currently contemplated, would only provide confirmation of PCC compliance after the energy has been contracted for, generated, and paid for by the buyer. This after-the-fact verification is difficult for sellers because they must incur significant up-front financial investment and expenditure of resources without certainty that their contractual arrangements will be upheld. It is difficult for buyers because they will only be found to be non-compliant after the end of the compliance period—at which point it is too late to procure additional RPS product. And while regulators have offered that over-procurement is a solution to this concern, that approach is not the most economical solution¹. Iberdrola seeks the highest level of certainty possible as soon as possible and, at a minimum, very clear instructions from the agencies responsible for compliance for the specific requirements for each PCC.

Ideally, regulators would give buyers clear upfront guidance—or even approval—on whether certain transactions meet the PCC requirements and consequently, if the requirements of such contract are followed, would be deemed a successful and “compliant” procurement of the PCC product on an after-the-fact basis. Guidance of this type would help buyers and sellers alike as they structure transactions to comply with the new requirements of the law. More sellers likely would enter the market if such guidance is offered, enhancing competition and likely saving ratepayers money.

Iberdrola recognizes that staff do not have the authority or bandwidth to provide upfront approval at this time. And while the proposed PCC spreadsheet takes a step in the right direction

¹ At the same time, it is being debated whether retail sellers may procure amounts of renewable energy products above their calculated “net short” positions. See comments of parties in Assigned Commissioner’s Ruling Issuing Procurement Reform Proposals in CPUC Rulemaking 11-05-055.

for identifying useful and relevant data, it does not in its current form meet this valuable purpose. For example, the spreadsheet does not address the PCC 2 prohibition on selling energy back to the RPS facility, nor does it identify the interconnection point for a specific substitute resource or the point of receipt and point of delivery for the substitute energy (including system power) to establish that the energy came from outside a California Balancing Authority (CBA).

Conceivably, the elements required to demonstrate eligibility for PCC 2 not currently reflected in the spreadsheet might be added as new columns to the spreadsheet. Affirming upfront that the substitute energy would not come from a CBA could be reflected in a representation by the seller in a contract. If the spreadsheet is used for upfront guidance, the existence of this representation could be included in a contract summary provided to regulators (see above). A simple “yes/no” column could be added to capture this element of a PCC 2 transaction.

At the November 30 working group meeting, participants said a clear set of guidance points is needed. Iberdrola proposed, and parties seemed to support, a set of pre-execution “checklists” sanctioned by the regulatory agencies that would guide buyers and sellers in creating transactions to meet PCC requirements with a high level of confidence. By providing such guidance to the marketplace, buyers and sellers may proceed with improved assurance that the contracts will ultimately be used for RPS compliance by utilizing the checklist elements in the contract.

Recognizing the checklists offered by Iberdrola at the working group meeting only reflect draft CEC requirements, Iberdrola nonetheless asserts the final checklists should be reflected in final CEC rules, and could be incorporated into the next available Revisions to the RPS Guidebook. In addition, the checklists may easily be adapted by the CPUC to conform to the PCC rules set forth in Decision 11-12-052. The CPUC could use these checklists as guidance for the retail sellers under its jurisdiction. Iberdrola attaches its presentation from the November 30 working group meeting, which includes proposed CEC checklists for each of the three PCCs, to these comments (“Attachment A”).

Based on comments at the November 30 workshop it is clear that both buyers and sellers value the guidance that would come from checklists that are sanctioned by the regulatory agencies. Iberdrola urges serious consideration of this approach.

Suggested Spreadsheet Refinements:

Staff have done a thorough job of devising the detailed spreadsheet that inventories a wide range of data that address various aspects of the RPS. Compiling “static” information for owned assets and power purchase agreements executed prior to June 1, 2010, is valuable to quantify and track resources that are, due to their vintage, not subject to the product content category requirements of Public Utilities Code Section 399.16.

Staff and working group participants also appeared inclined to broaden the application of the spreadsheet to assist with the categorization, tracking, and verification of resources for compliance purposes.

Iberdrola suggests strengthening and clarifying the inventory exercise by specifying data sources for each of the columns that comprise the inventory spreadsheet. For example, Footnote 8 requires proof that a renewable energy facility met CEC eligibility could be clarified by specifying that the CEC certification must be submitted as proof of eligibility.

For the Footnotes specifying “contract,” Iberdrola suggests creation of a summary or “cover sheet” for transactions providing the relevant information. Contracts submitted to the CPUC through the Advice Letter process include a summary that could be the basis for a similar sheet for this purpose. In all cases, commercially sensitive information should be protected and not made publicly available.

Below, Iberdrola suggests data sources for each spreadsheet column.

Footnote 1, Reporting Year: *Reporting entity provides this*

Footnote 2, Facility Name: *WREGIS ID or CEC eligibility pre-certification or webRegistry name (see proposal in body of these comments to merge this column with “Facility Source Name as Registered in webRegistry” column)*

Footnote 3, Technology: *WREGIS ID or CEC eligibility pre-certification/certification*

Footnote 4, Primary Fuel Type: *WREGIS ID or CEC eligibility pre-certification/certification*

Footnote 4, Secondary Fuel Type: *WREGIS ID*

Footnote 5, Owner/Seller: *Contract or “utility owned”*

Footnote 6, Location: *WREGIS ID*

Footnote 7, Facility Status: *Contract (not applicable to PCC 2 substitute energy)*

Footnote 8, Facility Met CEC Eligibility: *CEC pre-certification/certification*

Footnote 9, Contract Execution Date: *Contract (perhaps required for PCC 0 only)*

Footnote 10, Contract Start Date: *Contract*

Footnote 11, “Facility Beginning On Date”: *CEC certification*

Footnote 12: Facility Online Date: *CEC certification*

Footnote 13: Renewable Technology On-line date: *CEC certification*

Footnote 14: Contract End Date: *Contract*

Footnote 15: Contract Term: *Contract*

Footnote 16: Long Term/Short Term: *Contract*

Footnote 17: Contracted Amount: *Contract*

Footnote 18: Share of Total Generation: *Contract*

Footnote 19: Contract Termination Date: *Contract Termination Agreement*

Footnote 20: Amendments: *various*

Footnote 21, Resale? Yes/No: *Contract (all but PCC0)*

Footnote 22: Interconnection/Dynamic Transfer: *Depending on type of product: Interconnection Agreement, eTag and meter data, Dynamic Transfer Agreement*

Footnote 23: Facility Source Name as Registered in webRegistry: *webRegistry and contract (forward-looking only)*

Footnote 24: RPS ID for substitute energy (PCC 2): *CEC certification*

Footnote 25: Substitute energy executed on/after execution date for associated renewable energy: *Contract*

Iberdrola believes the spreadsheet generally captures the appropriate information in the “Portfolio Content Category 1” and “Portfolio Content Category 2 – Renewable” sections. The one area of concern is that by including “Share (%) of Total Generation” as a data point, the spreadsheet does not take into account contracts for specific volumes; this is important, as many transactions are done in this way. In addition, the spreadsheet should allow for multiple projects to be identified as the source for a single contract.

For the “Product Content Category 2 – Substitute Energy” section of the spreadsheet, Iberdrola believes it should be simplified. Given this spreadsheet is for “static” data—meaning information that would be known at the time of execution of a contract, the Substitute Energy source may not be specifically known as market or system power can be used as Substitute Energy. Thus, Iberdrola recommends simplifying this section only to request:

- Reporting Year
- Incremental to POU
- Owner/Seller
- Contract Execution Date
- Contract Term

- Contracted Amount
- Delivery Dates for Substitute Energy (new)

These key pieces of data provide a framework for answering the three key points related to Substitute Energy in the regulations: Substitute Energy is incremental to POU's supply portfolio, Substitute Energy is procured at the same time or after bundled energy & RECs are procured, and Substitute Energy is imported into CA in the same calendar year that the bundled energy & RECs are created. For the latter two points, these dates can be compared to the contract dates in the "Portfolio Content Category 2 – Renewable" section. Many of the other data requests included in the spreadsheet as presented are not applicable to Substitute Energy.

Footnote 25 should not be unique to POUs, to the extent the spreadsheet is a vehicle for verifying and tracking resources used by IOUs and ESPs for RPS compliance (see comments below).

Enhancing after-the-fact verification:

Closing the gap between upfront documentation and after-the-fact verification remains a significant concern of the entities with the RPS compliance obligation and, thus, extends to those who sell renewable energy products to them. More upfront guidance would help alleviate some of the concern. But since compliance is ultimately determined on an after-the-fact basis, clarity now about verification data requirements to be used later is also important.

Recognizing that the CEC needs time to build and implement a permanent verification data base, as described at the September 21 Workshop and the November 30 working group meeting, it needs to be clear to market participants today what data will be required to document after-the-fact categorization of specific renewable energy transactions. CEC staff have tentatively defined "Possible Documents Required to Verify" resources for the three PCCs on slide 31 of the September 21, 2012 presentation titled "RPS Procurement Reporting & Verification under SB X1-2" (Attachment "B"). Staff further clarified the documentation requirements for PCC 1 products scheduled into a CBA in slide 7 of its November 30, 2012 presentation to the verification working group. (Attachment "C"). A firm indication of the requirements is the next logical step.

For the PCC 1 products that meet the eligibility criteria laid out in the static spreadsheet, proof of the quantities of generation from eligible facilities and certifying that the underlying energy was not re-sold should satisfy the requirements for generation from facilities interconnected to a CBA or a distribution tied to a CBA.

For PCC 1 renewable generation moved to a CBA through dynamic transfer, proof of quantities and the dynamic transfer agreement as well as a certification that the power was not re-sold would demonstrate compliance.

For PCC 1 generation from an eligible renewable energy resource that is scheduled to a CBA on an hourly or sub-hourly basis, provision of WREGIS reports and a summary report of schedules from NERC e-Tags should be provided. This summary data may be backed up by meter data from the eligible renewable energy resource, NERC e-Tags (which include data on schedules and point of receipt/point of delivery tied to facilities that have RPS ID numbers which should appear on the e-Tags), and settlement invoices.

For PCC 2 products, proof of quantities of generation from the eligible facility for the calendar year, paired with quantification of the substitute energy imports in the same calendar year would establish quantities. PCC 2 products also must provide for Substitute Energy imported into a CBA, so demonstration of the source and the point of delivery of the substitute power must also be documented. This information may be obtained through the NERC e-Tags for the Substitute Energy imports.

For PCC 3 products, only a demonstration of quantities procured each year through the WREGIS ID numbers is required beyond the information on the static spreadsheet.

WREGIS reports can be utilized for all PCC verification—including total volume of RECs generated as well as NERC e-Tags for imported energy.

Technical issues:

As Iberdrola has previously described in both written comments and appearances at the September 21 workshop and November 30 working group meeting, the company seeks clarification of two important technical issues.

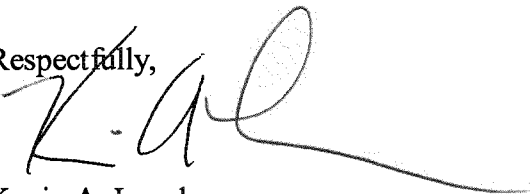
PCC 2 resales: As described above and in previous comments, the CPUC, in D. 11-12-052, sets a series of requirements to qualify transactions for PCC 2. The Commission expressly prohibits a renewable facility from buying back its own generation but makes allowances for affiliates of the renewable facility to buy energy from the renewable facility in order to effect a firming and shaping arrangement. To date, the CEC has not made clear that it will follow the same route as the CPUC. Both the draft CEC RPS rules and the presentations on verification include a simple prohibition on selling energy back to the renewable facility without clarifying that sales to an affiliate are permitted. Iberdrola strongly urges the CEC to clarify, as soon as practicable, that it is permissible for an affiliate of a renewable facility to purchase output from a renewable facility in order to firm and shape such energy for a buyer.

Inter-Scheduling Coordinator Trade (“IST”): Parties have expressed concern that requiring ISTs as a means of determining the content categorization of certain products. Iberdrola wishes to indulge all involved in this working group once more to reiterate the reasons not to require ISTs:

- An IST is a CAISO-only tool so the other four CBAs do not have the ability to use ISTs as a verification tool.
- ISTs are designed only to be used as a mechanism to settle transactions.
- ISTs do not verify physical delivery of power from sellers to buyers.
- ISTs do not verify a bundled sale of energy and RECs.
- The “point of delivery” on an IST is not required to match the energy import point or the “P-node” of an asset, thus providing no actual link to the underlying transaction.
- ISTs cost money (\$1/hour for each counterparty to a transaction).

There is more than enough information available to regulators to weigh contracts and, ultimately, completed transactions, against the eligibility criteria for each PCC. Since ISTs provide no additional useful information, in only one of the five CBAs, at a cost to buyers and sellers – and ultimately ratepayers – Iberdrola urges that regulators formally clarify that ISTs are not a required element of RPS contracts to demonstrate and document compliance with the product content categories.

Respectfully,



Kevin A. Lynch
 Vice President, External Affairs
 Iberdrola Renewables
 1125 NW Couch Street, Suite 700
 Portland, OR 97209
 (503) 796-7108
kevin.lynch@iberdrolaren.com
 copies:

-Sean Simon, *California Public Utilities Commission, Energy Division*

-Jessica Johnson, Kourtney Nelson, Carrie Plemons, Stewart Rosman, Diana Scholtes, Robin Smutny-Jones, Barrett Stambler, *Iberdrola Renewables*

Attachments:

Attachment A: Iberdrola Renewables November 30, 2012 presentation to Verification working group

Attachment B: CEC/Gina Barkalow presentation to verification Workshop, September 21, 2012, slide 26

Attachment C: CEC/Gina Barkalow presentation to verification working group, November 30, 2012, slide 7

ATTACHMENT A



**IBERDROLA
RENEWABLES**

Comments and Perspectives on RPS Verification and Implementation

November 30, 2012

Primary Goal: Clarity & Simplicity



Ongoing Clarification Needed for PCC (Bucket) Classification Rules

- Uncertainty breeds complex & costly contracting
- Buyers (fairly) fearful of after-the-fact non-compliance
- Unintended consequences in overly-conservative rule interpretation

Missing piece of puzzle: Upfront Bucket Classification

- Only IOUs obtain pre-approval of contracts & even then, don't get Bucket classification
- Bucket "Checklist" can provide clarity to all market participants
 - Complements CEC Form & can be utilized as part of upfront classification
 - Allows all market participants to understand required elements for Bucket classification
 - Published Checklists helps all market participants without putting additional burden on CEC & CPUC Staff

Checklist: Bucket 1 – In-State or In-State Equivalent

Section 3203(a) of the CEC Draft 33% RPS Pre-Rulemaking Draft Regulations, July 2012



CEC Regulation for PCC 1: One of following is a Required Element	Qualification Requirement for Up-Front Classification
<u>In-State Option #1:</u> RPS Energy generated by facility with first point of interconnection within a CA balancing authority area	<ul style="list-style-type: none"> Interconnection Agreement for Facility If IA not yet signed, Facility information in contract
<u>In-State Option #2:</u> RPS Energy generated by a facility with first point of interconnection to a distribution system (aka in the service area boundaries of a utility distribution company) within a CA balancing authority area.	<ul style="list-style-type: none"> Interconnection Agreement for Facility If IA not yet signed, Facility information in contract
<u>Out-of-State Option #1:</u> RPS Energy delivered from a facility into a CA balancing authority within the same hour it is generated ("source-to-sink" delivery) and without substituting electricity from another source (POU Board or its delegate) has approved the agreement prior to energy flowing. Only the lesser of generation and energy delivered to CA will count for this PCC1	<p>Contract includes provisions for</p> <ul style="list-style-type: none"> Source-to-sink delivery scheduling requirements Data requirement to compare scheduled and metered data on an hourly basis Delivery date starts after execution—implying consent by POU Board
<u>Out-of-State Option #2:</u> Executed dynamic transfer contract between a CA balancing authority and the balancing authority where facility is located, allowing for dynamic transfer of facility's electricity into the CA balancing authority area during the hour it is generated	<ul style="list-style-type: none"> Executed Dynamic Transfer Contract

3

Checklist: Bucket 2 – Firming & Shaping

Section 3203(b) of the CEC Draft 33% RPS Pre-Rulemaking Draft Regulations, July 2012



CEC Regulation for PCC 2: All Required Elements	Qualification Requirement for Up-Front Classification
WECC interconnected CEC-certified facility for bundled energy & RECs and substitute energy, both sourced outside of CA	<p>Contract includes provisions for</p> <ul style="list-style-type: none"> RPS Energy (RECs) sourced from CEC-Certified renewable energy projects located outside CA Substitute energy sourced outside of CA <ul style="list-style-type: none"> Sources: Market power, any asset in Seller's portfolio (including the CEC Certified project)
Substitute energy is incremental to POU's supply portfolio	<ul style="list-style-type: none"> Contract includes representation by Buyer to this effect
Substitute energy is procured at the same time or after the bundled energy & RECs are procured	<ul style="list-style-type: none"> Option #1: Substitute Energy & RPS Energy purchased in same contract Option #2: Execution Date of Substitute Energy contract on or after Execution Date of RPS Energy contract
Substitute energy is imported into CA in same calendar year that bundled energy & RECs are created	<ul style="list-style-type: none"> Contract includes specified delivery dates for Substitute Energy, matching vintage of RPS Energy
Bundled energy is not sold back to facility that generated it	<ul style="list-style-type: none"> Contract includes representation by Seller to this effect Note: IBR seeks clarification that selling to an affiliate for a Bucket 2 deal is allowed

part

4

Checklist: Bucket 3 – Unbundled RECs

Section 3203(c) of the CEC Draft 33% RPS Pre-Rulemaking Draft Regulations, July 2012



CEC Regulation for PCC 3: One of the following is a Required Element	Qualification Requirement for Up-Front Classification
Unbundled RECs	• Contract is only for RECs sourced from facilities located in the WECC
Other electricity products procured from RPS-certified facilities located within the WECC transmission grid that do not meet the requirements of either PCC1 or PCC 2.	• Any executed deal that fails to qualify as PCC1 or PCC2

5

After-the-Fact Verification: Data Sources



Facility Related Information (Location, Type, COD, Fuel, etc)

- CEC Certification Application
- WREGIS: Project registration includes all key facility information

Product Classification

- Contractual provisions

Quantity to be used for RPS Compliance:

- In-State Bucket 1: Meter Data from Facility(ies)
- Out-of-State Bucket 1 and Bucket 2:
 - Meter Data: Hourly meter data provided by facility owner and/or QRE data
 - Hourly Schedule Data: NERC eTag data (which reflects final schedule of energy delivered to CA)
 - NERC eTag data: Source, Sink, volume, date, delivery hour(s)
- WREGIS Certificates retired by LSE

6

Examples of Market Uncertainty



Inter-Scheduling Coordinator Trade ("IST"): Unnecessary & Additional Costs

- ISTs are not identified in any of the CEC or CPUC regulations for Bucket 1 or Bucket 2
- ISTs do not provide evidence of bundled transaction but rather are a settlements tool (transfers CAISO payment from one entity to another)
- Contract provides evidence bundled transaction
- In-State Bucket 1: Regulations are only for location of facility (delivery is assumed—not a specific requirement)
- Out-of-State Bucket 1 and 2: Rely on NERC eTag data for evidence of RPS Energy flowing into CA

Bucket 2 Element: "Bundled energy is not sold back to facility that generated it"

- Some entities both own facilities and can provide Firming & Shaping services
- Affiliate of a facility should be able to procure RPS Energy from such facility in this case

CPUC Bucket 2 Requirement: Too narrow of interpretation by some

- Requires: "buyer's simultaneous purchase of energy & associated RECs from the RPS-eligible generation facility without selling the energy back to the generator,"⁸⁰
- "Without selling the energy back to the generator" – same clarification needed as noted above
- Footnote 80: Allows Buyer to utilize an "agent" (aka its F&S provider) to make such purchase

7

Our Recommendations



1. Use Checklists as mechanism to guide upfront classification of PCCs to ensure market participants are confident of meeting the requirements
 - Publish Checklists in the CEC Guidebook
2. CEC and CPUC should deploy single common Checklists in order to promote a uniform marketplace
3. Confirm that ISTs are *not* a requirement for Bucket 1 and Bucket 2—other verification tools are sufficient
4. Clarification of Facility affiliate rules: Allow affiliates to
5. The CEC Form is provided by LSEs upon contract execution
 - CEC should utilize random audit rights for detailed data analysis: Hourly meter data, hourly schedule data (sum of eTag data), WREGIS reports, invoices

8

Contact Information



Regulatory: kevin.lynch@iberdrolaren.com

Origination: kourtney.nelson@iberdrolaren.com

9

Appendix: Inter-Scheduling Coordinator Trade ("IST")



- What is an IST?
 - CAISO is an LMP market, therefore buyers & sellers can *only* transact with the CAISO—no physical delivery of power like the rest of the WECC
 - In order to avoid double-payment, an IST is a settlements tool whereby the CAISO transfers funds it would have paid a Seller of energy to the other counterparty on the IST (aka the Buyer)
 - The IST does not show:
 - A physical delivery of power between the Seller and Buyer
 - A bundled sale of energy & RECs
 - The "point of delivery" identified on the IST is not required to match the delivery point of the energy (eg the import point or the asset's Pnode)
 - ISTs are burdensome because: 1) the CAISO charges parties to use an IST (\$1 per hour for both counterparties); and 2) requires extra work for both scheduling desks.
 - ISTs are strictly a tool offered by the CAISO—thus non-CASIO entities cannot use this tool. Requiring the use of an IST is an unfair compliance obligation to some market participants.
 - Regulations do not denote where payment for the product must come from—aka payment from CAISO due to its market structure should not exempt a product from proper Bucket classification.
- One Potential Solution: Invoicing Mechanism
 - Seller tracks the payments that it will receive from the CAISO for the in-state generation or imported power and sums such amount for a month.
 - Seller provides a "CAISO Credit" on the monthly invoice by which the payment the Seller receives from the CAISO for the generation or import of energy is shown as a credit on the invoice.
 - Advantages:
 - Provides simple internal tracking for both counterparties
 - Cost effective
 - Seller still receives full contract price

10

ATTACHMENT B



Verification of SB X1-2 Product Content Categories

Product Content Categories	Possible Documents Required to Verify
PCC 1 – First point of interconnection to the WECC transmission grid within the metered boundaries CBA	Copy of Interconnection Agreement WREGIS Report – Compliance Report
PCC 1 - First point of interconnection with the electricity distribution system used to serve end users within the metered boundaries of a CBA	Copy of Interconnection/Net Metering Agreement Invoice substantiating amount of AB 920 procurement WREGIS Report – Compliance Report
PCC 1 – Scheduled directly into a CBA within the hour without using substitute energy. Ancillary services allowed to meet hourly or subhourly import schedule, but only renewable fraction of the schedule actually generated is RPS eligible.	WREGIS Report – Compliance Report WREGIS Report – NERC e-Tag Summary Report Auditable Package: Hourly Meter Data; Hourly scheduled data ; NERC e-Tags; Invoices, other data as necessary.
PCC 1 - Scheduled into a California balancing authority pursuant to a dynamic transfer agreement	Copy of Dynamic Transfer Agreement WREGIS Report – Compliance Report
PCC 2 –Firming and Shaping – incremental energy scheduled into a CA balancing authority	Contract date checks for RE and substitute energy contracts WREGIS Report – Compliance Report NERC e-Tag Summary Report, NERC e-Tags, etc.
PCC 3 – Products not meeting PCC1 or PCC2 and Unbundled Renewable Energy Credit –	WREGIS Report – Compliance Report

ATTACHMENT C



4. Verification documentation for PCC1 S

After the Fact – Verification

LSEs must be prepared to provide sufficient documentation to support PCC1 HOURLY claims.

Verification documentation for claims - scheduled into a CBA:

- ✓ WREGIS Compliance Reports & WREGIS e-Tag Summary Report
- ✓ RPS Generator listed as the Source (must provide Facility Source Name as registered with webRegistry)
- ✓ RPS ID in Misc Field (enables e-tag data to be pulled into WREGIS)
- ✓ Final schedule amount sufficient to cover monthly and annual amounts.

An Auditable Package:

- ✓ Annual - hourly scheduled data pulled from individual e-Tags and put into a spreadsheet for comparison with hourly meter data also in spreadsheet form.
- ✓ Randomly selected e-Tags specified by staff
- ✓ Invoices and other supporting documentation, as necessary and available.