



December 12, 2012

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814 - 5504

RE: November 30 Working Group Meeting on Renewables Portfolio Standard Verification Process

Southern California Edison Company (“SCE”) respectfully offers these written comments on the California Energy Commission's (“CEC's”) and the California Public Utilities Commission's (“CPUC's”) November 30, 2012 joint Working Group Meeting on the Renewables Portfolio Standard (“RPS”) Verification Process (“Working Meeting”).

SCE is encouraged by the continued collaboration between the CEC and CPUC regarding the implementation of the RPS program and appreciates the agencies’ openness to input from stakeholders. The CPUC has now issued several decisions implementing Senate Bill 2 (1x)’s new RPS program requirements.¹ These rulings should provide the basis for future updates to the CEC’s RPS Eligibility Guidebook as the updates pertain to load-serving entities (“LSEs”) governed by the CPUC.

In regards to the Working Meeting, SCE provides the following written comments on three topics discussed that are of interest to SCE.

¹ Decision (“D”) 11-12-020 sets procurement quantity requirements, D.11-12-052 implements the portfolio content categories, and D.12-06-038 establishes compliance rules for the RPS program.

A. Verification of the Portfolio Content Categories for Load-Serving Entities Whose RPS Compliance is Regulated by the CPUC Falls Under the Jurisdiction of the CPUC

A portion of the Working Meeting was spent discussing a reporting template developed by the CEC for the verification of the portfolio content categories. SCE understands that the reporting template was developed by the CEC mainly for the use of publicly-owned utilities (“POUs”). During the Working Meeting, SCE stated that verification of the portfolio content categories for the investor-owned utilities, electric service providers, community choice aggregators and any other load-serving entities whose RPS compliance is regulated by the CPUC is the responsibility of the CPUC and, as such, adding another reporting requirement by the CEC for these load-serving entities would be unnecessary and duplicative. While the CPUC expressed interest in collecting similar information for purposes of verifying the portfolio content categories, this reporting requirement does not currently apply to CPUC-regulated LSEs. To the extent this information is required of LSEs whose RPS compliance is regulated by the CPUC, SCE recommends that the information should only be required by the CPUC and that arrangements between the CPUC and CEC should be made for sharing of this information if necessary.

B. The CEC Should Not Require Separate Retirement Subaccounts in WREGIS for Each Portfolio Content Category

Another topic discussed during the Working Meeting was the creation of retirement subaccounts in the Western Renewable Energy Generation Information System (“WREGIS”) for each portfolio content category. The CEC stated the reason for proposing the use of portfolio content category subaccounts in WREGIS was to assist them during the RPS verification process. SCE appreciates the CEC’s effort to streamline the verification process. However, while this proposed structure might work for POUs, SCE recommends that the investor-owned utilities and other load-serving entities whose RPS compliance is regulated by the CPUC continue retiring WREGIS Certificates using subaccounts by year (e.g., 2011, 2012, 2013, etc.). As stated earlier, the CPUC will determine compliance with the portfolio content categories for these LSEs; therefore, adding additional subaccounts in WREGIS creates unnecessary complexity to the retirement process.

C. Clear Retirement Guidelines are Needed in the Next Edition of the RPS Eligibility Guidebook

LSEs responsible for working toward the State’s 33% RPS goal need greater clarity in the CEC’s RPS verification process, particularly as it relates to the retirement of renewable energy credits (“RECs”). In order to provide much needed clarity on this matter, SCE recommends that the next edition of the RPS Eligibility Guidebook address the link between when a REC is retired, which must be within 36 months of its original generation, and the year for which the REC may be applied for compliance. Additionally, SCE recommends that the CEC provide clear guidelines on the time allowed for making procurement claim adjustments.

SCE looks forward to working with the CEC and CPUC to address these issues and other issues related to the implementation of the RPS.

Sincerely,

/s/Manuel Alvarez

Manuel Alvarez