

STATE OF CALIFORNIA
CALIFORNIA ENERGY COMMISSION

In the matter of:

Implementation of Renewables Portfolio
Standard Legislation

and

Implementation of Renewables Investment Plan
Legislation

Docket No. 03-RPS-1078 and
11-RPS-01 (RPS Proceeding)

Docket No. 02-REN-1038

**COMMENTS OF SHELL ENERGY
NORTH AMERICA (US), L.P. FOLLOWING THE
NOVEMBER 30 WORKSHOP ON
SBX1 2 RPS REPORTING AND VERIFICATION**

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Date: December 12, 2012

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Subject: RPS Proceeding

In accordance with the schedule established at the November 30, 2012 workshop in the above-referenced matter, Shell Energy North America (US), L.P. (“Shell Energy”) submits its comments on the joint California Energy Commission (“CEC”) and California Public Utilities Commission (“CPUC”) Staff workshop addressing SBX1 2 RPS reporting and verification.

Shell Energy’s comments are as follows:

1. Information Requirements

Upon review of the RPS contract information requested in the Excel spreadsheet provided at the workshop, it appears that much of the “static” information is duplicative of information that already exists in the CEC’s “List of Eligible Resources” or in WREGIS.

To the extent possible, when the information requested already exists either in the CEC’s List of Eligible Resources or in WREGIS, the CEC should create links in the spreadsheet to access the existing data and create formulas to simplify the data requirements. For example, an LSE could enter the CEC RPS ID, or WREGIS Generator ID, and the fields requesting Location (e.g., in-state or out-of-state), Facility Name, Technology, and Facility Status, could be linked to the CEC Eligible Facilities spreadsheet and the data requested would automatically populate with information that the CEC already has available.

In addition, when the data requested can be calculated, create formulas in the spreadsheet. For example, Contract Term would equal the Contract Start Date subtracted from the Contract End Date. If the result is greater than ten years, in the field requesting whether a contract is short-term or long-term, the formula would default to “long-term.”

The CEC and the CPUC should do everything possible to simplify the data transfer process. Recreating the data for multiple agencies in multiple spreadsheets is resource intensive and creates the potential for errors.

2. Verification Documentation

LSEs generally do not require copies of interconnection agreements when entering into contracts with RPS generators. The CEC currently requests this information in its renewable generator certification application for eligibility (in Section V). If this information is not provided as part of the application process, it is likely available in WREGIS. Nonetheless,

providing interconnection agreements should not be an LSE requirement. An interconnection agreement is generator- specific.

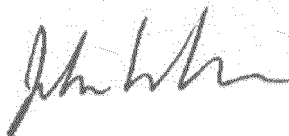
3. Product Content Categories (“PCC”)

The CEC and the CPUC should create examples and a checklist of what products or transactions meet the requirements to be classified under the various PCCs. The CEC’s previous RPS Eligibility Guidebooks provided examples. A similar approach should be followed in the draft of the next Guidebook. In addition, the CPUC’s Energy Division should provide examples on their FAQ page, and/or issue an “Advisory” that includes a checklist of the elements that must be included to “count,” for RPS compliance, a contract in a specific PCC.

4. Conclusion

Shell Energy appreciated the opportunity to participate in the November 30 workshop and further appreciates the opportunity to submit these written comments.

Respectfully submitted,



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