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JOHN W. LESLIE  
619.699.2536

# McKenna Long & Aldridge<sup>LLP</sup>

600 West Broadway • Suite 2600  
San Diego, CA 92101-3372  
Tel: 619.236.1414  
mckennalong.com

Northern Virginia  
Orange County  
Rancho Santa Fe  
San Diego  
San Francisco  
Seoul  
Washington, DC

EMAIL ADDRESS  
jleslie@mckennalong.com

June 21, 2013

## VIA E-MAIL

Robert Blackney  
Energy Division/Renewable Energy Policy  
& Procurement  
California Public Utilities Commission  
505 Van Ness Avenue

San Francisco, CA 92104

Re: **R.11-05-005**: Informal Comments of Shell Energy on the Energy Division's  
"Proposed Changes to the RPS Compliance Report Spreadsheet and New  
Reporting Documents"

Dear Mr. Blackney:

Shell Energy appreciates the opportunity to comment on the Energy Division's proposed changes to the RPS Compliance Report spreadsheet and new reporting documents related to the new RPS portfolio content categories ("PCC"). In general, Shell Energy objects to the number of proposed reports and the duplicative information requested in the proposed reports. Rather than simplifying the reporting structure to accommodate the necessary changes resulting from SBIX 2, the Energy Division has taken the original RPS compliance report and layered on additional (and duplicative) data reporting requirements. Some of the data is unnecessary to determine RPS compliance or compliance with the PCC categories. A great deal of the information requested in the proposed reports is readily available via WREGIS. Requiring the submission of paper copies is unduly burdensome.

## I.

### GENERAL COMMENTS

The Energy Division has allowed only one week for interested parties to provide comments on a complex and significantly revised RPS reporting framework. Shell Energy provides preliminary comments herein, but it also reserves the right to make further comments once other parties have contributed comments on the reporting templates.

In addition, load-serving entities (“LSE”) should not be required to submit their RPS forms to the Energy Division in a formal manner before the draft forms have been fully vetted. LSEs should be required to file the 2012 RPS reporting forms only when the final version of each template has been adopted.

Finally, these reports are intended to evidence an LSE’s compliance with the RPS. Any data related to an RPS-eligible generator is provided to the CEC and certified during its certification process. RECs generated in WREGIS evidence that certification meets the State’s RPS. There is a great deal of information in these documents that has nothing to do with LSE compliance, but rather addresses the generator and its renewable status.

Shell Energy suggests the following approach to assist the Energy Division in creating reporting templates that will make the annual RPS reporting process more efficient for all LSEs. The Energy Division should permit market participants to submit proposed templates for consideration through an informal workshop process. Written comments on the parties’ proposed templates should be permitted after the workshop. A streamlined reporting requirement will be more useful to the Energy Division and easier for LSEs to complete, while providing the Energy Division with all the information that it requires to determine RPS compliance as well as compliance with the PCC requirements.

In this connection, Shell Energy proposes that LSEs should be required to submit to the Energy Division the following information:

- 1) WREGIS “State/Provincial/Voluntary Compliance Report.”
- 2) WREGIS “Matched” Report: This will provide the Energy Division with all of the information concerning RECs that have been retired for compliance, including the NERC E-Tags associated with imports and the Certificate numbers (once WREGIS PCR 209 is operational expected July 2013). This will eliminate the need to submit the proposed “RPS Hourly E-Tag Summary Report.” The information that the Energy Division proposes to elicit in this latter report can be submitted upon request or spot-checked by the Energy Division based on the LSE’s WREGIS reports.
- 3) Annual 33% RPS Compliance Report: Only the Accounting/Procurement tabs are necessary in the Compliance Report, which can include information from the Static Report that is not provided in WREGIS.

## II.

### SPECIFIC ISSUES OF CONCERN

If the Energy Division does not pursue the informal collaborative workshop approach suggested above, the Energy Division must nevertheless modify the draft templates that were circulated on June 14. Shell Energy proposes the following modifications:

RPS Compliance Report:

- 1) The tab entitled “RECs retired to meet the procurement Quantity Requirement (“PQR”)” is duplicative and unnecessary. An LSE only utilizes retired RECs for compliance and those will be provided in the WREGIS State/Provincial/Voluntary Compliance Report.
- 2) With the exception of the “Contract Data,” the Static Report duplicates the information that is provided in WREGIS. The contract data should be included on the “Procurement” tab.

Hourly E-Tag Summary Report:

- 1) This information (with the exception of the PCC classification) is available in the WREGIS “matched” report. The Energy Division can compare the procurement claims in the Compliance Report against the volumes in the WREGIS report. Furthermore, reporting should be based on RECs retired, not “tags.” Similarly, the Hourly E-Tag Summary Report should be by certificate. PCC 1 will have NO tag if in-state, and will appear on the Hourly Meter and E-Tag Reconciliation Report if PCC 1 (S) or (DT). If PCC2 or PCC0, the certificate will have annual volume matched to monthly RECs. If the tags were not available in WREGIS, the RECs will still appear on the report as retired. Corresponding tags can be provided outside of WREGIS to ‘match’ to the retired REC volume. The Report should provide for the category an LSE is claiming - by certificate, not by tag.

Hourly Meter and E-Tag Reconciliation Report:

If this Report is required at all, it must be modified as follows:

- 1) Amount of Energy Taken by Retail Seller (Column G) is not defined.
- 2) The calculations in the spreadsheet are incorrect:
  - a. Column J: The result should equal the metered amount over the schedule. No RECs were generated above the meter. The volume of the schedule over the meter may be available to a CP as ‘incremental,’ depending on the contract.
  - b. Requiring submission of individual tags on individual lines requires a different calculation – e.g., if there are two tags in one hour represented on

two lines of data, the meter data do not change. The current draft counts the meter data multiple times, resulting in more RECs than were actually created.

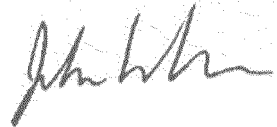
- 3) There are multiple fields listed in the instructions that are not represented on the spreadsheet.
- 4) This report should only be used to validate CP's PCC 1 (S) volume. The amount claimed in any compliance period will not necessarily be the amount represented by e-tag hourly volume. An LSE does not retire RECs by tag volume; rather, an LSE retires RECs and matches to NERC E-tags as evidence of delivery. Tags are proof of delivery, not proof of PCC 1(S). Proof of PCC 1(S) requires the certificate and the tag.

### III.

#### CONCLUSION

Because LSEs have to complete the adopted RPS reporting forms, it would be most productive at this time for LSEs and other interested parties to submit proposed templates for the Energy Division to consider. A workshop to discuss the reporting templates would serve to allow all parties to contribute to a streamlined reporting process. Parties should have an opportunity, after the workshop, to submit further written comments.

Very truly yours,



John W. Leslie  
of  
McKenna Long & Aldridge LLP

Attorneys for Shell Energy North America  
(US), L.P.

JWL/smp

cc: All Parties on Service List in R.11-05-005

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