

March 21, 2014

**By Electronic Mail
(R.11-05-005 Service List)**

Re: R.11-05-005; Comments of Powerex Corp. on RPS Portfolio Content
Category Staff Proposal and Reporting Documents

Pursuant to the February 14, 2014 email to the R.11-05-005 Service List soliciting informal comments on the CPUC Energy Division's RPS Portfolio Content Category Staff Proposal and related reporting documents, and the February 26th email granting an extension for serving comments, Powerex Corp. ("Powerex Corp.") hereby respectfully submits these informal comments.

Hourly Meter and e-Tag Reconciliation Report

Powerex's main concern is that the column labeled "Percent Share of Facility Output (%)" in the Hourly Meter and e-Tag Reconciliation Report should not be a calculated field.

The issue with the "Percent Share of Facility Output (%)" being a calculated field is that it does not accommodate the circumstance where multiple parties have independent offtake agreements (and consequently schedules) from the same facility in the same hour. The spreadsheet as proposed implicitly assumes that only one entity is scheduling off the facility in a given hour. The spreadsheet needs to take into account total schedules off the facility in a given hour in order to accurately calculate eligible Portfolio Content Category ("PCC") 1 volume. For example, if two parties have Final e-Tag Schedules of 50 MWh from the same 100 MW facility for the same hour, but the actual Hourly Meter Data for the facility during that hour was only 80 MWh, each of the two individual parties would calculate 50 MW of eligible PCC 1 volume, making a total claim between the two parties of 100 MW of PCC 1 volume. Whereas in fact only 80 MW of eligible PCC 1 was delivered (40 MW for each of the two reporting entities based on a 50% share of the revenue meter) for that hour.

The issue can be addressed by having the "Percent Share of Facility Output (%)" be entered into the report rather than being a calculated field. This would be consistent with the approach of the California Energy Commission ("CEC") in the CEC's Annual Hourly Comparison Spreadsheet; it would also be consistent with the Energy Division Staff Proposal,

which appears to contemplate that the percent share of a facility's output would be an entered value.¹

Hourly e-Tag Summary Report

The Energy Division Staff Proposal describes a "Miscellaneous Token Field RPS_ID" column in the Hourly e-Tag Summary Report² that does not appear in the actual report. Powerex would like clarification on whether there will be a separate "Miscellaneous Token Field RPS_ID" column in the summary report, or whether the information for that column should be entered in the "Importing Entity" column.

Powerex greatly appreciates this opportunity to provide comments on the RPS Portfolio Content Category Staff Proposal and related reporting documents.

Very truly yours,

GOODIN, MACBRIDE, SQUERI,
DAY & LAMPREY, LLP

/s/ Suzy Hong

Suzy Hong

On behalf of Powerex Corp.

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¹ Energy Division Staff Proposal: Portfolio Content Category Classification Review Process for RPS Compliance, p. 12.

² *Id.*