

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue)	
Implementation and Administration, and)	Rulemaking 15-02-020
Consider Further Development, of California)	(Filed February 26, 2015)
Renewables Portfolio Standard Program.)	

**SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) 2011-2013 COMPLIANCE
PERIOD 1 VERIFIED AND 2015 PRELIMINARY ANNUAL 33% RENEWABLES
PORTFOLIO STANDARD COMPLIANCE REPORT**

**CONFIDENTIAL VERSION
(Appendix A through C)**

**THIS DOCUMENT CONTAINS CONFIDENTIAL MATERIALS THAT ARE
PROTECTED PURSUANT TO CALIFORNIA PUBLIC UTILITIES COMMISSION
DECISIONS AND APPLICABLE LAW. PUBLIC DISCLOSURE IS RESTRICTED.**

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Dated: September 1, 2016

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Pursuant to California Public Utilities Code Section 399.13(a)(3), Decision (“D.”) 11-12-052, and D.12-06-038, Southern California Edison Company (“SCE”) respectfully submits its 2011-2013 Compliance period 1 Verified and 2015 Preliminary Annual 33% Renewables Portfolio Standard (“RPS”) Compliance Report (“RPS Compliance Report”). By an August 2, 2016 email, Energy Division’s Robert Blackney notified all retail sellers that the due date for RPS Compliance Reports was September 1, 2016.

I.

RPS COMPLIANCE REPORT SPREADSHEET

SCE’s RPS Compliance Report spreadsheet is included as Appendix A. The information included in SCE’s RPS Compliance Report spreadsheet is stated based on information and belief. SCE’s RPS Compliance Report spreadsheet includes contracts executed through June 30, 2016.

In addition, the sections showing RPS procurement by technology in the “First Compliance Period Summary,” “Second Compliance Period Sum.,” “33% RPS Progress Summary,” and “Procurement Detail” tabs include both a “Biomethane: Landfill gas” row and a duplicative “Landfill Gas” row that can be eliminated.

II.

SITING AND PERMITTING STATUS OF PROJECTS IN DEVELOPMENT

The Annual 33% RPS Compliance Reporting Instructions issued by Energy Division (“Reporting Instructions”) require retail sellers, pursuant to Public Utilities Code Section 399.13(a)(3), to provide the status of any necessary siting and permitting approvals from federal, state, and local agencies for those eligible renewable energy resources procured by the retail seller that have not yet attained their commercial online dates. SCE has 78 RPS-eligible projects under contract that have not yet reached commercial operation. The status of siting and permitting for each of these eligible renewable energy resources is provided in the Siting and Permitting Status Table attached as Appendix B.

III.

PROCUREMENT OF ELIGIBLE RENEWABLE RESOURCES LOCATED OUTSIDE OF CALIFORNIA

In accordance with Public Utilities Code Section 399.13(a)(3), the Reporting Instructions require identification of all procurement from eligible renewable energy resources located outside California and within the Western Electricity Coordinating Council during the period covered by this RPS Compliance Report (i.e., 2015). Below, SCE includes its procurement from contracts with such resources for 2015.

Procurement from out-of-state renewable resources:¹

<u>Out-of-State Contracts</u>	<u>Project Location</u>	<u>2015 Procurement (MWh)</u>
North Hurlburt Wind, LLC	Arlington, OR	489,302
South Hurlburt Wind, LLC	Arlington, OR	530,392
Horseshoe Bend Wind, LLC	Arlington, OR	568,073
Goshen Phase II LLC	Idaho Falls, ID	317,886
Total		1,905,653

IV.

PROCUREMENT OF UNBUNDLED RENEWABLE ENERGY CREDITS

The Reporting Instructions also require identification of all procurement of unbundled renewable energy credits (“RECs”) during the period covered by this RPS Compliance Report (i.e., 2015). SCE procured no unbundled RECs in 2015. Moreover, SCE has not executed any contracts for future delivery of unbundled RECs. SCE may procure unbundled RECs in the future; however, SCE cannot identify the potential future source(s) of any such unbundled RECs at this time.

V.

RECOMMENDATIONS FOR REMOVING IMPEDIMENTS TO MAKING PROGRESS TOWARD ACHIEVING THE 33% RPS GOAL

As provided in Public Utilities Code Section 399.13(a)(3), the Reporting Instructions request recommendations for removing impediments to making progress toward achieving the renewable energy goals established by statute and implemented by California Public Utilities Commission (“Commission”) decision. California and SCE have made significant progress toward those goals. Today, the State enjoys a mature renewables market where contracting opportunities abound. Existing procurement programs sufficiently support the development of

¹ Out-of-state renewable resources are resources located outside California and not directly connected to a California Balancing Authority.

renewable energy in the State. With a robust market for renewable energy already established, additional subsidies and incentives are neither appropriate, nor necessary.

Nevertheless, some regulatory and procedural barriers remain that can impede achievement of the State's 33% RPS goal. See Section IV of SCE's 2016 RPS Procurement Plan² filed on August 8, 2016 for a discussion of several factors that will challenge achievement of the State's RPS goals. In this compliance report, SCE identifies four primary factors that will challenge achievement of the State's 33% RPS goal: (1) the increasing proportion of intermittent resources in SCE's renewables portfolio; (2) permitting, siting, approval, and construction of both renewable generation projects and transmission; (3) a heavily subscribed interconnection queue; and (4) developer performance issues. SCE discusses each of these potential issues that could cause compliance delays and describes the steps it has taken to mitigate the effects of these challenges. SCE's recommends using the mitigation steps discussed in SCE's 2016 RPS Procurement Plan as a starting point to identify policies and rules that can help alleviate obstacles for meeting the State's 33% RPS target. The risks of meeting the State's new 50% RPS target by 2030 may be substantially different than those associated with meeting the 33% target by 2020. These risks include the possibility that formation of Community Choice Aggregators ("CCA") based primarily on procurement of short-term contracts for RECs to meet the 33% RPS target may not be able to support the long-term contracting requirements embedded in the 50% RPS target requirements. As a result, procurement to the meet the 50% RPS target may default to SCE without sufficient time for SCE to enter into necessary long-term contracts.

² See Southern California Edison Company's (U 338-E) 2016 Renewables Portfolio Standard Procurement Plan at 22-28 (August 8, 2016).

VI.

STATUS AND PROGRESS TOWARD DEVELOPMENT OF TRANSMISSION AND DISTRIBUTION FACILITIES

Consistent with Public Utilities Code Section 399.13(a)(3), the Reporting Instructions request information about the current status and progress made during the prior year toward construction of, and upgrades to, transmission and distribution facilities and other electrical system components owned by electrical corporations to interconnect eligible renewable energy resources and to supply the electricity generated by those resources to load.

California's renewable energy goals have created a need for additional transmission and distribution infrastructure in order to deliver renewable power from remote locations. Below, SCE lists the status and progress of SCE's major transmission projects that will interconnect renewables and deliver their energy to load.

A. West of Devers Upgrade Project ("WOD")

Project Description	The proposed WOD facilities will be located in San Bernardino and Riverside Counties in southern California. WOD entails the removal and rebuilding of five existing 220 kV lines (Devers-Vista #1, Devers-Vista #2, Devers-San Bernardino, Devers-El Casco, and El Casco-San Bernardino). The upgraded 220 kV lines are needed to allow full delivery of multiple generation projects interconnecting at SCE's new Colorado River and Red Bluff Substations.
Purpose Related to RPS	Construction of WOD will increase the transfer capability of the existing WOD corridor and provide for the full delivery of new renewable solar generation being developed in California.
Current Status/Major Activities Completed	Licensing and Permitting: SCE anticipates receiving a Certificate of Public Convenience and Necessity ("CPCN" from the Commission in Q3 2016 and a Record of Decision from the BLM in Q4 2016.
Expected MW of Renewable Generation Integrated	4,000 MW

B. Tehachapi Renewable Transmission Project (“TRTP”)

Project Description	TRTP is an 11-segment project consisting of new and upgraded 220 kV and 500 kV transmission lines and associated substations built primarily to assist the development of renewable energy generation projects in remote areas of eastern Kern County, California. Segments 1-3 consist of 83 miles of new transmission line and Segments 4-11 consist of 173 miles of transmission line.
Purpose Related to RPS	TRTP will support interconnection of up to 4,500 MW of generation, most of which is expected to be from renewable resources. This will improve the reliability of the California transmission grid by enabling the expansion of the transfer capability of Path 26, serving load growth in the Antelope Valley, and easing transmission constraints in the Los Angeles basin.
Current Status/Major Activities Completed	In Construction: Regulatory approvals granted for Tehachapi Segments 4-11 include: Commission CPCN in December 2009, US Forest Service Biological Opinion in July 2010, US Forest Service Record of Decision (“ROD”) in October 2010, US Army Corp of Engineers ROD in February 2011, and Angeles National Forest Special Use Permit in September 2011. SCE filed a Petition for Modification (“PFM”) with the Commission in October 2011 and a decision was obtained in October 2013. An additional PFM was filed in July 2013 and a decision was obtained in January 2014. Construction on Segments 4-11 began in 2010. All segments are in service except for the 500kV Mira Loma – Vincent forecast to be in-service in 2016, pending completion of the 500kV underground portion through the city of Chino Hills.
Expected MW of Renewable Generation Integrated	4,500 MW

C. Path 42 Upgrade

Project Description	This project, in partnership with Imperial Irrigation District (“IID”), will enable the delivery of additional renewable energy to the CAISO-controlled grid. The SCE portion of this project primarily consists of the construction of approximately 15 miles of the Devers-Mirage #1 and Devers-Mirage #2 230kV transmission lines along with various upgrades at both Devers Substation and Mirage Substation.
Purpose Related to	This project will enable transfer of renewable energy from

RPS	IID to SCE's portion of the CAISO-controlled grid.
Current Status/Major Activities Completed	The Devers-Mirage line #2 was completed on 6/22/2014. Devers-Mirage #1 was completed 11/22/2014. The Path 42 RAS will be placed in service Fall 2016. Once IID completes their portion of the RAS, this project will contribute in meeting the RPS goal of 33% of retail load served by renewable resources by 2020.
Expected MW of Renewable Generation Integrated	1,090 MW

D. Distribution System Upgrades

In addition to the transmission projects listed above, SCE has made upgrades to its distribution system to interconnect eligible renewable energy resources and to supply the electricity generated by those resources to load. Based on executed Interconnection Agreements from January 1, 2015 to December 31, 2015, SCE has installed or is in the process of installing the following distribution system upgrades in support of distributed renewable generation projects:

- 2 - Primary Metering Cabinets
- 1 – 4 way Gas Switch
- 1 – Grounding Transformer
- 1 – Ground detector
- Approximately 2.4 miles of primary and secondary cable
- 5 – Transformers
- 4 – Poles
- Approximately 4 pole replacements
- 2 – Automatic Recloser
- 5 – Circuit breakers

These upgrades represent distribution system-level upgrades. Most distribution upgrades require permitting according to local city requirements, are planned according to a standardized internal SCE process, and are paid for by generators and not directly by SCE's customers.

VII.

RENEWABLE NET SHORT UPDATE

Appendices C.1, C.2, C.3, and C.4 include SCE's forecast of its renewable procurement position and need – i.e., SCE's renewable net short ("RNS"). These Appendices use the standardized reporting template included in the Administrative Law Judge's Ruling on Renewable Net Short, R.11-05-005, dated May 21, 2014 ("RNS Ruling"). As required in the Revised Energy Division Staff Methodology for Calculating the Renewable Net Short ("Revised RNS Methodology") attached to the RNS Ruling, Appendices C.1 and C.2 include physical RNS calculations. Moreover, Appendices C.3 and C.4 include optimized RNS calculations. Appendices C.1 and C.3 include physical and optimized RNS calculations using all required assumptions for the Commission's Revised RNS Methodology. Appendices C.2 and C.4 include physical and optimized RNS calculations using SCE's assumptions. SCE based its forecasted renewable procurement position and need, using both SCE's assumptions and the Commission's assumptions, on the RPS procurement targets adopted by the Commission in D.11-12-020 and other relevant RPS program rules (e.g., rules on banking of excess procurement across compliance periods). Both forecasts include all projects under contract and assume contracted projects that are currently online will deliver 100% of their expected amount of renewable energy. Both forecasts also include generation from pre-approved procurement programs (i.e., the Renewable Auction Mechanism, the Renewable Market Adjusting Tariff, and the Solar Photovoltaic Program) at a 100% success rate before contracts are signed.³ Additionally, both forecasts incorporate current expected online dates for all projects that are not yet online.

Furthermore, both forecasts account for potential issues that could delay RPS compliance, project development status, minimum margin of procurement, and other potential risks through the use of SCE's probabilistic risk-adjusted success rates for energy deliveries from

³ After contracts from such programs are signed, they are risk adjusted in the same manner as other projects with executed contracts that are not yet online.

contracted projects that are not yet online. These probabilistic risk-adjusted success rates are intended to reflect a number of dynamic factors and are periodically adjusted based on new information. The forecasts include individual project-specific, risk-adjusted success rates for large, near-term projects and a flat 60% success rate for the remaining projects, which is based on these projects' overall weighted average success rate. The overall probabilistic risk-adjusted success rate for energy deliveries from SCE's portfolio of contracts with projects that are not yet online varies from around 89% for the second compliance period to approximately 79% in the third compliance period and approximately 74% thereafter.

The difference between the forecasts using SCE's assumptions, as reflected in Appendices C.2 and C.4, and the Commission's assumptions, as reflected in Appendices C.1 and C.3, is that SCE uses its most recent bundled retail sales forecast for all years while the Commission's assumptions use SCE's most recent bundled retail sales forecast for 2016 through 2020 the 2014 Long-term Procurement Plan ("LTPP") standardized planning assumptions for 2020 through 2024 with bundled retail sales forecast beyond 2024 projected at the average annual rate of change between the 2020-2024.⁴ SCE uses its own bundled retail sales forecast for renewable procurement planning because it is SCE's best forecast of bundled retail sales.

⁴ The Revised RNS Methodology states that retail sellers can use their own forecasts for bundled retail sales for the first five years and should use the LTPP standardized planning assumptions thereafter. *See* RNS Ruling, Attachment A at 25. In Appendices C.1 and C.3, the bundled retail sales forecast beyond 2024 is projected at the average annual rate of change between 2020 and 2024 because there is no LTPP forecast for those years.

VIII.

DOCUMENTS SUPPORTING PORTFOLIO CONTENT CATEGORY

CLASSIFICATIONS

SCE's Static Contract Information spreadsheet is included as Appendix D. The information included in SCE's Static Contract Information spreadsheet is stated based on information and belief. SCE is also providing other required documentation to Energy Division.⁵

IX.

RENEWABLE ENERGY CREDIT RETIREMENT ISSUES

SCE has retired and reported in Appendix A 46,132,127 eligible RECs for compliance period one as verified by the CEC. Of this amount, 36,581 RECs have been identified as in violation of the 36-month REC retirement rule and have been excluded from counting towards SCE's procurement requirements. SCE would like to highlight two issues with regards to these exclusions.

The first relates to a unique reporting instance with SCE's Ormesa Geothermal I contract, and request eligibility for a specific batch of renewable energy credits ("RECs") that has been identified as in violation of the 36-month REC retirement rule in Appendix A.

In 2011, SCE was made aware that the Geo East Mesa generator, one of the Ormesa Geothermal I facility's three generators, was not certified by the California Energy Commission ("CEC") as RPS-eligible. SCE worked with Ormat, the developer of the Ormesa Geothermal I facility, and the CEC to establish correct capacity allocations for each of the three generators of the Ormesa Geothermal I facility in an effort to correctly update the amount of generation that was RPS-eligible. Based on the EIA-860 form for the Ormesa Geothermal I facility, it was

⁵ SCE is not providing an Hourly Meter and e-Tag Reconciliation Report spreadsheet, a WREGIS NERC e-Tag Summary Report spreadsheet, or an Energy Division RPS Hourly e-Tag Summary Report spreadsheet because all of its RECs generated from out-of-state facilities in 2011 through 2015 are from contracts classified as portfolio content category 0.

established that approximately 37 percent of the entire facility's output belonged to the Geo East Mesa generator, and could not be retired as RPS-eligible. SCE retired RECs from the Ormesa Geothermal I facility's output according to this allocation. The CEC verified SCE's final RPS claim amount for the Ormesa Geothermal I facility for March 2007 through December 2010.⁶ Separately, SCE submitted an RPS eligibility certification application to ensure the entire output of the Geo East Mesa generator would be RPS-eligible moving forward. The CEC approved RPS eligibility for the Geo East Mesa generator starting in April 2011.

In early 2014, SCE mistakenly continued to retire RECs according to the 37 percent RPS-ineligible allocation for vintage April 2011 through December 2011, even though the entire facility's output was 100 percent RPS-eligible. SCE recognized this oversight in May 2014, and corrected it by retiring the remaining 37 percent of RECs from vintage April 2011 through December 2011. However, two batches of these RECs are considered late according to the Commission's interpretation of the 36-month REC retirement rule. SCE highlights these specific REC retirements below, and asks the Commission to consider the circumstances surrounding the retirements. SCE was applying the 37 percent ineligible allocation to the output of the Ormesa Geothermal I facility to correctly report that the Geo East Mesa generator was awaiting approval of its CEC RPS certification application for a certain period of time, and inadvertently continued to apply the allocation even after the CEC had approved the generator as 100 percent RPS-eligible.

On May 30, 2014, SCE retired 13,172 RECs⁷ for April 2011 and 13,652 RECs⁸ for May 2011, totaling 26,824 RECs. The 13,172 RECs created for April 2011 were mistakenly retired after the 36-month REC retirement deadline as explained above. The 13,652 RECs created for May 2011 were retired in May 2014, and have also been identified as in violation of the 36-

⁶ See CEC's RPS 2008-2010 Verification Report at 47-48 (November 2013) (available at <http://www.energy.ca.gov/2013publications/CEC-300-2013-010/CEC-300-2013-010-CMF.pdf>).

⁷ This represents 37 percent of the Ormesa Geothermal I facility for April 2011.

⁸ This represents 37 percent of the Ormesa Geothermal I facility for May 2011.

month REC retirement deadline, as explained above. Public Utilities Code Section 399.21(a)(6) states that “[a] renewable energy credit shall not be eligible for compliance with a renewables portfolio standard procurement requirement unless it is retired in the tracking system established pursuant to subdivision (c) of Section 399.25 by the retail seller or local publicly owned electric utility within 36 months from the initial date of generation of the associated electricity.” The Commission counts the month in which a REC is generated as one of the full 36 months within the deadline; thus a REC created for May 2011 must be retired by April 2014.⁹ However, that is not the only interpretation of Public Utilities Code Section 399.21(a)(6). Indeed, the CEC’s RPS enforcement procedures for local publicly owned electric utilities (“POUs”) provide that:

A POU may not use a REC associated with electricity products to meet its RPS procurement requirements unless it is retired within 36 months from the initial month of the generation of the associated electricity. For example, a POU can retire a REC associated with electricity generated in February 2011 no later than February 28, 2014, to claim the REC toward the POU’s RPS procurement quantity requirements.¹⁰

Accordingly, SCE’s May 2011 RECs retired in May 2014 would meet the CEC’s 36-month retirement deadline.

SCE respectfully requests that due to the “good faith” intentions in which these RECs were created in May 2011 and retired in May 2014, the Commission allow these 13,652 RECs to count toward RPS goals. The RECs were retired within 36 calendar months of generation. Moreover, as evidenced by the CEC’s interpretation of Public Utilities Code Section 399.21(a)(6), counting these RECs toward RPS targets would not violate the requirements of the statute. This interpretation and implementation of the 36-month retirement rule would ultimately allow for more RPS-eligible generation to count towards California’s RPS program targets while staying within the intent of the RPS law. SCE is not requesting a similar waiver for the 13,172 RECs from April 2011 because they were clearly retired beyond the 36-month requirement.

⁹ See D.12-06-038 at 48-49.

¹⁰ 20 C.C.R. § 3202(c).

SCE appreciates the Commission's consideration of this matter, and looks forward to any potential further dialogue.

Secondly, there are several batches of RECs from Coso Power Developers, Coso Energy Developers, and Goshen Phase II that are incorrectly listed as "failing" under the 36-month retirement rule in Appendix A as shown in the table below. RECs from these three projects were incorrectly labeled with earlier vintage months by the Western Renewable Energy Generation Information System ("WREGIS"), and must be corrected in order to avoid false violations of the 36-month retirement rule. This mislabel of RECs is a result of the way WREGIS processes negative adjustments. Specifically, RECs that are already created for a vintage month cannot be deleted or relabeled, even if a lower generation amount is later reported for that vintage month as an adjustment. As a specific example, the batch of 750 RECs labeled as vintage April 2009 for Coso Power Developers in Appendix A was originally part of 35,798 MWh reported and created for April 2009. SCE later reported an adjusted amount of 35,048 MWh (750 MWh less) for April 2009 during the April 2011 REC cycle, and retired those 35,048 RECs. Instead of discarding the extra 750 RECs for April 2009, WREGIS created 750 fewer RECs for eligible generation in February 2011. Because SCE retired 750 less RECs for April 2009, this adjustment was already reflected in SCE's earlier retirements, and 750 RECs were therefore incorrectly subtracted from eligible February 2011 generation. Even though those 750 RECs are labeled as April 2009, they correctly belong to February 2011, and therefore do not violate the 36-month REC retirement rule with the retirement date of January 31, 2014. This same issue applies to the other three batches of RECs from Coso Energy Developers and Goshen Phase II, but with different vintage months as seen below. SCE highlights these reporting issues so that the Commission can count the RECs highlighted in the table below as passing the 36-month rule. These RECs are specifically located in Appendix A within the "(2013) 36 Month Retirement" tab, rows 1861, 1893, 2758, and 7067.

CEC's RPS 2011-2013 Verification Report, dated July 2016, agrees with SCE's position, at page 18 stating that:

SCE is claiming generation with a generation (vintage) date prior to 2011. SCE reported claims from Coso Power Developers and Coso Energy Developers facilities for a total of 9,730 MWh with a vintage date of 2009 and claims from Goshen Phase II facility for 27 MWh with a vintage date of 2010. SCE has provided documentation from WREGIS showing that these claims were part of a prior period adjustment that occurred in WREGIS. Generation from these facilities was reported incorrectly in WREGIS, and too many RECs were created. When the error was discovered, WREGIS corrected it by not creating the full amount of RECs in 2011 to compensate for the error. SCE held onto the extra 2009 and 2010 RECs in those reporting years because the RECs did not represent the actual 2009 and 2010 generation of the facilities. Although the vintage year of the RECs is 2009 and 2010, these RECs represent generation that occurred in 2011. As a result, SCE has reported these RECs for Compliance Period 1.¹¹

Facility Name	Vintage Month/Year	Retirement Date (MM/DD/YYYY)	Last Month to Retire REC (Month/Year)	Do RECs "Pass" or "Fail" Requirements of 36 Month Rule:	MWh REC Quantity Retired	Actual Vintage
Coso Energy Developers - Coso Energy Developers	05/2009	01/31/2014	Apr-2012	FAIL	5987	02/2011
Coso Power Developers - Coso Power Developers	04/2009	01/31/2014	Mar-2012	FAIL	750	02/2011
Goshen Phase II LLC - Goshen Phase II LLC	09/2010	01/31/2014	Aug-2013	FAIL	27	03/2011
Coso Energy Developers - Unit 2	05/2009	01/31/2014	Apr-2012	FAIL	2993	02/2011

X.

CONFIDENTIALITY

SCE is submitting a confidential and a public version of its 2011-2013 Compliance Period 1 Verified and 2015 Preliminary Annual 33% RPS Compliance Report. Confidentiality Declarations for the 2011-2013 Compliance Period 1 Verified and 2015 Preliminary Annual 33% RPS Compliance Report are included as Appendix E.

¹¹ See, CEC's RPS 2011-2013 Verification Report, dated July 2016, p. 18, at <http://www.energy.ca.gov/2016publications/CEC-300-2016-004/CEC-300-2016-004-CMF.pdf>.

XI.

CONCLUSION

SCE respectfully submits its 2011-2013 Compliance Period 1 Verified and 2015 Preliminary Annual 33% RPS Compliance Report.

Respectfully submitted,

JANET S. COMBS
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September 1, 2016

Appendix A (CONFIDENTIAL)
RPS Compliance Report Spreadsheet

OFFICER VERIFICATION FORM

I am an officer of the reporting corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true. The spreadsheet format used to file this compliance report has not been altered from the version issued or approved by Energy Division.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 29, 2016 at Rosemead, California.

A handwritten signature in black ink, appearing to read 'Colin E. Cushnie', is written above a horizontal line.

Colin E. Cushnie, Vice President, Southern California Edison

Appendix B (CONFIDENTIAL)
Siting and Permitting Status Table

Appendix C (CONFIDENTIAL)
Renewable Net Short Calculations

Appendix D

Static Contract Information Spreadsheet

OFFICER VERIFICATION FORM

I am an officer of the reporting corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true. The spreadsheet format used to file this RPS Static Contract Information report has not been altered from the version issued or approved by Energy Division.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 29, 2016 at Rosemead, California.

A handwritten signature in black ink, appearing to read 'Colin E. Cushnie', is written over a horizontal line.

Colin E. Cushnie, Vice President, Southern California Edison

Appendix E

Confidentiality Declarations

**DECLARATION OF DAVID R. COX REGARDING THE CONFIDENTIALITY OF
CERTAIN DATA**

I, David R. Cox, declare and state:

1. I am the Principal Manager of the Renewable Contracts Management department at Southern California Edison Company ("SCE"). As such, I have reviewed the data in SCE's 2015 Preliminary Annual 33% Renewables Portfolio Standard ("RPS") Compliance Report, Appendix B, Siting and Permitting Status Table (the "Protected Materials"). I make this declaration in accordance with California Public Utilities Commission ("Commission" or "CPUC") Decisions ("D.") 06-06-066 and D.08-04-023, issued in Rulemaking ("R.") 05-06-040. I have personal knowledge of the facts and representations herein and, if called upon to testify, could and would do so, except for those facts expressly stated to be based upon information and belief, and as to those matters, I believe them to be true.

2. Listed below are the data in the Protected Materials for which SCE is seeking confidential treatment. SCE is seeking confidential treatment of certain data that is market-sensitive, but may not fall into a category on the Matrix of Allowed Confidential Treatment Investor Owned Utility ("IOU") Data ("Matrix") appended to D.06-06-066.

3. In the Siting and Permitting Status Table, the following columns contain confidential, market-sensitive information, as applicable: "Project Status" (cell A:55), "Contract Status" (cell D:55), "Site Control Status" (cells E:3-E:82), "Permit Type" (cell F:55), "Permit Status" (cells G:4, G:6-G:15, G:17, G:21, G:23-G:24, G:31-G:34, G:41, G:45, G:47-G:69, G:71-G:73, G:75, G:77, G:79-G:80 and G:82), and "Expected or Actual permitting completion date" (cells H:4, H:6-H:15, H:17, H:21, H:23-H:24, H:31-H:34, H:41, H:45, H:47-H:69, and H:71-H:73, H:75, H:77, H:79-H:80 and H:82). For the reasons discussed below, this information is confidential and market-sensitive and should not be disclosed to the public.

4. The information identified in paragraph 3 is confidential because it relates to the terms and conditions of the individual contracts entered into between SCE and the respective generators. Contractual information is protected under the Matrix under "Section VII. Bilateral

Contract Terms and Conditions – Electric (G) Renewable Resource Contracts under RPS program – Contracts without SEPs.” More specifically, Section VII.G provides that contract information shall be confidential for three years after first delivery or one year following expiration. SCE is seeking confidential treatment for contracts that have not been delivering for three years; thus, the information is protected. Additionally, the Commission also concluded that project-specific project viability information should remain confidential in D.09-06-018.

5. Information identified in paragraph 3 is also protected under Public Utilities Code Section 454.5(g) and General Order 66-C.

6. Public Utilities Code Section 454.5(g) requires the Commission to maintain the confidentiality of “market sensitive information.” It provides: “The commission shall adopt appropriate procedures to ensure the confidentiality of any market sensitive information submitted in an electrical corporation’s proposed procurement plan or resulting from or related to its approved procurement plan, including, but not limited to, proposed or executed power purchase agreements, data request responses, or consultant reports, or any combination, provided that the Office of Ratepayer Advocates and other consumer groups that are nonmarket participants shall be provided access to this information under confidentiality procedures authorized by the commission.”

7. General Order 66-C requires the Commission to protect confidential information that would place a utility at an “unfair business disadvantage” if it were publicly disclosed. It categorizes as information that is “not open to public inspection,” those “[r]eports, records, and information requested or required by the Commission which, if revealed, would place the regulated company at an unfair business disadvantage.” General Order 66-C, § 2.2(b).

8. The information identified in paragraph 3 is considered market sensitive and would place SCE at an unfair business disadvantage for several reasons.

9. Public disclosure of SCE’s judgment that a particular project is failing to meet milestones or otherwise struggling may impair the project developer’s ability to secure financing, attract investors, or raise capital. Obviously, a project’s failure to gain funding of any

type could result in the project failing. The Commission should be as concerned about the effect on the project developer of releasing SCE's assessment of the projects overall viability as it is about the effect on SCE and its customers. Disclosure of this type of information in the hope of providing greater public access to RPS data may actually have the opposite of the presumably desired effect by causing or contributing to project failure.

10. SCE maintains the confidentiality of this information not only from the public at large, but from its counterparties as well. If this information were to be released and result in the failure of a contract based on an inability to acquire financing because of publicly released negative information from SCE, then SCE could be exposed to potential litigation from developers for the release of such information.

11. SCE could be damaged by the long-term effect of the loss of trust between SCE and prospective renewable generators that would be engendered by such a disclosure. This "loss of trust" would create a competitive disadvantage for SCE in its procurement efforts on behalf of its customers.

12. Disclosure of the status of an RPS project would also hinder SCE's contract administration of all of its yet to be completed RPS projects. By revealing that certain milestones have not been reached or revealing that delays have occurred, a "floor" is created as to what SCE is willing to allow a future developer to do during the development of a project. This "floor" will disadvantage SCE in the development of RPS projects by allowing such parties to exploit concessions that SCE provided under unique circumstances even though such concessions would not be appropriate in a different context or under different facts. Simply stated, publically revealing this information may impair SCE's ability to actively manage milestones and administer contracts for projects in development, a result that would appear to be directly contrary to the desire of policy makers to bring as much renewable power on-line as soon as possible.

13. I am informed and believe and thereon allege that the information identified in paragraph 3 cannot be aggregated, redacted, summarized, masked or otherwise protected in a

manner that would allow partial disclosure of the data while still protecting confidential information.

14. I am informed and believe and thereon allege that the information identified in paragraph 3 has never been made publically available.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 1, 2016 at Rosemead, California.

A handwritten signature in black ink, appearing to read "David R. Cox", is written over a horizontal line.

David R. Cox

**DECLARATION OF ERIC LAVIK REGARDING THE CONFIDENTIALITY OF
CERTAIN DATA**

I, Eric Lavik, declare and state:

1. I am the Principal Manager of Modeling, Forecasting, and Economic Analysis in the Portfolio Reporting department at Southern California Edison Company (“SCE”). As such, I have reviewed the data in SCE’s 2011-2013 Compliance Period 1 Verified and 2015 Preliminary Annual 33% Renewables Portfolio Standard (“RPS”) Compliance Report, Appendix A, RPS Compliance Report spreadsheet (“RPS Compliance Spreadsheet”) and Appendices C.1-C.4, Renewable Net Short Calculations (collectively, the “Protected Materials”). I make this declaration in accordance with California Public Utilities Commission (“Commission” or “CPUC”) Decisions (“D.”) 06-06-066 and D.08-04-023, issued in Rulemaking (“R.”) 05-06-040. I have personal knowledge of the facts and representations herein and, if called upon to testify, could and would do so, except for those facts expressly stated to be based upon information and belief, and as to those matters, I believe them to be true.

2. Listed below are the data in the Protected Materials for which SCE is seeking confidential treatment and the categories on the Matrix of Allowed Confidential Treatment Investor Owned Utility (“IOU”) Data (“Matrix”) appended to D.06-06-066 to which these data correspond.

Data	Spreadsheet/Tab and Cell Reference	Matrix Category	Period of Confidentiality
Forecast of bundled customer energy retail sales and information that calculates back to this forecast	RPS Compliance Spreadsheet (Appendix A): 33% RPS Progress Summary tab: “Retail Sales (MWh)” (Cells H10-K10) “Annual RPS Target” (Cells	V.C LSE Total Energy Forecast – Bundled Customer (MWh)	Front three years of forecast data confidential.

	<p>H12-K12)</p> <p>“Procurement Quantity Requirement” (Cells F13-L13)</p> <p>RPS Compliance Spreadsheet (Appendix A): Accounting tab:</p> <p>“Annual Retail Sales” (Cells H18-K18)</p> <p>“Annual RPS Procurement Percentage” (Cells H21-K21)</p> <p>“Procurement Quantity Requirement (PQR)” (Cells F26-L26)</p> <p>“RECs as Percentage of Retail Sales” (Cells H32-K32)</p>		
Forecast of bundled customer energy retail sales and information that calculates back to this forecast	<p>Physical Renewable Net Short Calculations Based on CPUC Assumptions (Appendix C.1):</p> <p>“Bundled Retail Sales Forecast (LTPP)” (Cells M6-Q6, S6)</p> <p>“Gross RPS Procurement Quantity Requirement (GWh)” (Cells M8-Q8, S8)</p> <p>“Net RPS Procurement Need (GWh)” (Cells M10-Q10, S10)</p> <p>“Annual Gross RPS Position (GWh)” (Cells M24-Q24, S24)</p>	V.C LSE Total Energy Forecast – Bundled Customer (MWh)	Front three years of forecast data confidential.

	<p>“Annual Gross RPS Position (%)” (Cells M25-Q25, S25)</p> <p>“Existing Banked RECs above the PQR” (Cells O:27-Q27, S27)</p> <p>“RECs above the PQR added to Bank” (Cells M28-Q28, S28)</p> <p>“Non-bankable RECs above the PQR” (Cells M29-Q29, S29)</p> <p>“Gross Balance of RECs above the PQR” (Cells M30-Q30, S30)</p> <p>“Net Balance of RECs above the PQR” (Cells M33-Q33, S33)</p> <p>“Category 0 RECs” (Cells M34-Q34, S34)</p> <p>“Category 1 RECs” (Cells M35-Q35, S35)</p> <p>“Category 2 RECs” (Cells M36-Q36, S36)</p> <p>“Annual Net RPS Position After Bank Optimization (GWh)” (Cells M40-Q40, S40)</p> <p>“Annual Net RPS Position After Bank Optimization (%)” (Cells M41-Q41, S41)</p> <p>Physical Renewable Net Short Calculations Based on SCE Assumptions</p>		
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	<p>(Appendix C.2):</p> <p>“SCE Bundled Sales Forecast” (Cells M6-Q6, S6)</p> <p>“Gross RPS Procurement Quantity Requirement (GWh)” (Cells M8-Q8, S8)</p> <p>“Net RPS Procurement Need (GWh)” (Cells M10-Q10, S10)</p> <p>“Annual Gross RPS Position (GWh)” (Cells M24-Q24, S24)</p> <p>“Annual Gross RPS Position (%)” (Cells M25-Q25, S25)</p> <p>“Existing Banked RECs above the PQR” (Cells O:27-Q27, S27)</p> <p>“RECs above the PQR added to Bank” (Cells M28-Q28, S28)</p> <p>“Non-bankable RECs above the PQR” (Cells M29-Q29, S29)</p> <p>“Gross Balance of RECs above the PQR” (Cells M30-Q30, S30)</p> <p>“Net Balance of RECs above the PQR” (Cells M33-Q33, S33)</p> <p>“Category 0 RECs” (Cells M34-Q34, S34)</p>		
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	“Category 1 RECs” (Cells M35-Q35, S35) “Category 2 RECs” (Cells M36-Q36, S36) “Annual Net RPS Position After Bank Optimization (GWh)” (Cells M40-Q40, S40) “Annual Net RPS Position After Bank Optimization (%)” (Cells M41-Q41, S41) All of Optimized Renewable Net Short Calculations Based on CPUC Assumptions (Appendix C.3) All of Optimized Renewable Net Short Calculations Based on SCE Assumptions (Appendix C.4)		
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3. In addition to the confidential information included in both the Physical and Optimized Renewable Net Short Calculations identified in the table above, the Application of Bank and Net RPS Position (Optimized Net Short) sections of the Optimized Renewable Net Short Calculations (Appendices C.3 and C.4) should be confidential for all years because they show SCE’s portfolio optimization strategy for utilizing renewable energy credits (“RECs”) above the procurement quantity requirement (“PQR”). This is consistent with the Commission’s Revised Energy Division Staff Methodology for Calculating the Renewable Net Short (“RNS”), which states that “[t]he optimized RNS will be confidential and include a retail seller’s assumptions for its overall portfolio strategy including any plans to sell forecast RECs above the PQR, apply forecast RECs above the PQR towards a future RPS compliance requirement, or

procure more RECs above the PQR in future years.” This detailed information on SCE’s portfolio optimization strategy for utilizing RECs above the PQR is also market sensitive information that would put SCE at an unfair business disadvantage if it were publicly disclosed. Accordingly, it is protected under Public Utilities Code Section 454.5(g) and General Order 66-C. All public information in Appendices C.3 and C.4 is publicly disclosed in the Physical Renewable Net Short Calculations in Appendices C.1 and C.2.

4. This information has not been made public, and cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

5. I am informed and believe and thereon allege that SCE is complying with the limitations on confidentiality specified in the Matrix that pertain to the data listed in the table above.

6. I am informed and believe and thereon allege that the data in the table above cannot be aggregated, redacted, summarized, masked or otherwise protected in a manner that would allow partial disclosure of the data while still protecting confidential information.

7. Additionally, SCE is seeking confidential treatment of certain data that is market-sensitive, but may not fall into a category on the Matrix.

8. In the RPS Compliance Spreadsheet: Procurement Detail tab, the “Facility Status” column (Column Z) contains confidential, market-sensitive information as applicable. Specifically, this column requires SCE to indicate the status (e.g., “on schedule” or “delayed”) for RPS contracts that are not currently on-line or terminated. For the reasons discussed below, this information is confidential and market-sensitive and should not be disclosed to the public.

9. The information identified in paragraph 8 is confidential because it relates to the terms and conditions of the individual contracts entered into between SCE and the respective

generators. Contractual information is protected under the Matrix under “Section VII. Bilateral Contract Terms and Conditions – Electric (G) Renewable Resource Contracts under RPS program – Contracts without SEPs.” More specifically, Section VII.G provides that contract information shall be confidential for three years after first delivery or one year following expiration. SCE is seeking confidential treatment for contracts that have not been delivering for three years or expired for one year; thus, the information is protected. In addition, and in accordance with the level of protection afforded under the Matrix, SCE has not redacted the individual contract summaries, which include counterparty name, resource type, location, capacity, and length of contract. Finally, the Commission also concluded that project-specific project viability information should remain confidential in D.09-06-018.

10. Information identified in paragraph 8 is also protected under Public Utilities Code Section 454.5(g) and General Order 66-C.

11. Public Utilities Code Section 454.5(g) requires the Commission to maintain the confidentiality of “market sensitive information.” It provides: “The commission shall adopt appropriate procedures to ensure the confidentiality of any market sensitive information submitted in an electrical corporation’s proposed procurement plan or resulting from or related to its approved procurement plan, including, but not limited to, proposed or executed power purchase agreements, data request responses, or consultant reports, or any combination, provided that the Office of Ratepayer Advocates and other consumer groups that are nonmarket participants shall be provided access to this information under confidentiality procedures authorized by the commission.”

12. General Order 66-C requires the Commission to protect confidential information that would place a utility at an “unfair business disadvantage” if it were publicly disclosed. It

categorizes as information that is “not open to public inspection,” those “[r]eports, records, and information requested or required by the Commission which, if revealed, would place the regulated company at an unfair business disadvantage.” General Order 66-C, § 2.2(b).

13. The information identified in paragraph 8 is considered market sensitive and would place SCE at an unfair business disadvantage for several reasons.

14. Public disclosure of SCE’s judgment that a particular project is failing to meet milestones or otherwise struggling may impair the project developer’s ability to secure financing, attract investors, or raise capital. Obviously, a project’s failure to gain funding of any type could result in the project failing. The Commission should be as concerned about the effect on the project developer of releasing SCE’s assessment of the projects overall viability as it is about the effect on SCE and its customers. Disclosure of this type of information in the hope of providing greater public access to RPS data may actually have the opposite of the presumably desired effect by causing or contributing to project failure.

15. SCE maintains the confidentiality of this information not only from the public at large, but from its counterparties as well. If this information were to be released and result in the failure of a contract based on an inability to acquire financing because of publicly released negative information from SCE, then SCE could be exposed to potential litigation from developers for the release of such information.

16. SCE could be damaged by the long-term effect of the loss of trust between SCE and prospective renewable generators that would be engendered by such a disclosure. This “loss of trust” would create a competitive disadvantage for SCE in its procurement efforts on behalf of its customers.

17. Disclosure of the status of an RPS project would also hinder SCE's contract administration of all of its yet to be completed RPS projects. By revealing that certain milestones have not been reached or revealing that delays have occurred, a "floor" is created as to what SCE is willing to allow a future developer to do during the development of a project. This "floor" will disadvantage SCE in the development of RPS projects by allowing such parties to exploit concessions that SCE provided under unique circumstances even though such concessions would not be appropriate in a different context or under different facts. Simply stated, publically revealing this information may impair SCE's ability to actively manage milestones and administer contracts for projects in development, a result that would appear to be directly contrary to the desire of policy makers to bring as much renewable power on-line as soon as possible.

18. I am informed and believe and thereon allege that the information identified in paragraph 8 cannot be aggregated, redacted, summarized, masked or otherwise protected in a manner that would allow partial disclosure of the data while still protecting confidential information.

19. I am informed and believe and thereon allege that the information identified in paragraph 8 has never been made publically available.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 26, 2016 at Rosemead, California.

A handwritten signature in black ink, reading "Eric Lavik", is written over a horizontal line.

Eric Lavik