

Sonoma Clean Power Authority

2015 Annual 33% RPS Compliance Report

Narrative Reporting Requirements

1. 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 on-line dates.
 - a. 50001 SCWA North and South Ponds – under development (on schedule)
 - b. 50002 SCWA R1 & R2 Ponds – under development (on schedule)
 - c. 50003 SCWA R4 Pond – under development (on schedule)
 - d. 50004 SCWA R5 Pond – under development (on schedule)
 - e. Golden Hills Wind – under development (on schedule)
2. Identification of all procurement from eligible renewable energy resources located outside California and within the WECC during the period covered by the report. Retail sellers should submit a list of facilities in a matrix format including: facility name, location (City and State), and the amount of renewable energy credits (RECs) procured during the year covered by the report (i.e. 2015 for this report).

Contract Detail/Facility Name	Total RECs Procured from Out of State Generators (2015)	Facility City	Facility State
Constellation Phase 1 PCC 3 - Biomass One, LP (61204A; W2546)	19,548	White City	OR
Constellation Phase 1 PCC 3 - Northern Colorado Wind II (60897A; W1305)	2,442	Peetz	CO
Constellation Phase 1 PCC 3 - Cedar Creek II (61384A; W1900)	57,558	New Raymer	CO
Constellation Phase 1 PCC 3 - High Mesa (62361A; W3391)	9,000	King Hill	ID
Constellation Phase 1 PCC 2 - Seven Mile Hill I and I (60807A & 60808A; W975 & W976)	27,225	Medicine Bow	WY
Constellation Phase 1a PCC 2 - Top of the World (61199A; W1749)	35,771	Glenrock	WY
Constellation Phase 1a/2 PCC 2 - Wolverine Creek (60564A; W188)	8,772	Bingham County	ID
Constellation Phase 1a/2 PCC 1 - Juniper Canyon (61202A; W1690)	49,891	Bickleton	WA
Constellation Phase 2 PCC 2 - Campbell Hill (61017A; W1383)	18,398	Glenrock	WY
Constellation Phase 2 PCC 2 - Dunlap I (61188A; W1687)	34,819	Medicine Bow	WY
Constellation Phase 2 PCC 2 - Elkhorn Valley Wind Farm (60134A; W186)	48,000	Union	OR
Constellation Phase 2 PCC 2 - Glenrock I and III (60805A & 60804A; W964 & W965)	24,638	Glenrock	WY
Constellation Phase 2 PCC 2 - Goodnoe Hills (60819A; W536)	12,631	Goldendale	WA

Constellation Phase 2 PCC 2 - High Plains (60899A; W1334)	17,385	Rock River	WY
Constellation Phase 2 PCC 1 & 2 - Leaning Juniper I (60562A; W200)	62,584	Arlington	OR
Constellation Phase 2 PCC 2 - Marengo I & II (60729A & 60730A; W185 & W772)	25,011	Dayton	WA
Constellation Phase 2 PCC 2 - McFadden Ridge (60899A; W1341)	4,906	Rock River	WY
Constellation Phase 2 PCC 2 - Neal Hot Springs Unit #1 (62427A; W3155)	25,883	Vale	OR
Constellation Phase 2 PCC 2 - Rolling Hills (60806A; W928)	16,331	Glenrock	WY
NextEra Energy Power Marketing LLC - Vanscycle II (60944A; W1458)	25,000	Umatilla County	OR
Morgan Stanley Capital Group - Seneca Sustainable Energy (61090A; W2045)	2,109	Eugene	OR
Shell Energy North America - Limon Wind III (62859A; W4269)	49,531	Limon	CO
Cargill Power Markets, LLC - Tucannon River Wind (63027; W4482) & various	39,559	Dayton	WA
TOTAL RECS PROCURED	616,992		

3. Identification of all procurement of unbundled RECs during the period covered by the report. Retail sellers should submit a list of facilities in a matrix format including: facility name, location (City and State), and the amount of unbundled RECs procured during the year covered by the report (i.e. 2015 for this report).

Contract Detail/Facility Name	Total Unbundled RECs Procured (2015)	Facility City	Facility State
Biomass One, LP (61204A; W2546)	19,548	White City	OR
Northern Colorado Wind II (60897A; W1305)	2,442	Peetz	CO
Cedar Creek II (61384A; W1900)	57,558	New Raymer	CA
High Mesa (62361A; W3391)	9,000	King Hill	ID
TOTAL RECS PROCURED	88,548		

4. Recommendations to remove impediments to making progress toward achieving the renewable energy resources procurement requirements established by statute and implemented by Commission decision.

Sonoma Clean Power Authority ("SCPA") has no recommendations at this time. However, we would like to note the following regarding reporting requirements:

- The reporting requirements for the RPS Procurement Plan and Annual Compliance Report do not appear to align with other reporting requirements at the California Public Utilities Commission and the California Energy Commission. Specifically, reporting REC procurement by contract is inconsistent with reporting to the California Energy Commission on REC procurement by vintage, and is also inconsistent with retirement of RECs in WREGIS. Furthermore, the formulae applied in the RPS compliance spreadsheet require selection of a single resource for each contract. Where contracts are for multiple renewable resources, this causes the outcome

in terms of resource mix to look different from other disclosures made to various reporting agencies, as well as to SCPA's customers.

- SCPA has multiple contracts that are "seller's choice," meaning the seller has the choice of which certified generating unit(s) to apply to the contract. This means it is difficult to meet the reporting requirements to provide specific generating units associated by contract in the RPS Annual Compliance Report and Static Contract Sheet. For example, SCPA has designated certain RECs that were retired for 2015 compliance as under contract year 2014 when they were provided under contracts signed in 2013 and 2014 but not distinguished by the seller.
- The requested information for which balancing authorities energy flows through can be interpreted ambiguously. SCPA has contracts that generate energy in one Balancing Authority Area ("BAA"), flow through another, and then arrive in the CAISO. In that case, clarity on whether the generating BAA or the last BAA the energy flows through before arriving in the CAISO should be reflected would be helpful.