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5-22-15  
09:38 AM

CAP/jt2 5/22/2015

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

Order Instituting Rulemaking to Continue  
Implementation and Administration, and  
Consider Further Development, of California  
Renewables Portfolio Standard Program.

Rulemaking 15-02-020  
(Filed February 26, 2015)

**ASSIGNED COMMISSIONER'S RULING IDENTIFYING ISSUES AND  
SCHEDULE OF REVIEW FOR 2015 RENEWABLES PORTFOLIO  
STANDARD PROCUREMENT PLANS**

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**ASSIGNED COMMISSIONER'S RULING IDENTIFYING ISSUES AND  
SCHEDULE OF REVIEW FOR 2015 RENEWABLES PORTFOLIO  
STANDARD PROCUREMENT PLANS**

**1. Summary**

Pursuant to the authority provided in Pub. Util. Code § 399.13(a)(1),<sup>1</sup> today's ruling identifies issues and sets a schedule for the Commission's review of the 2015 Renewables Portfolio Standard (RPS) Procurement Plans and of related documents for electric corporations. Pursuant to § 365.1<sup>2</sup> and Decision (D.) 11-01-026,<sup>3</sup> this ruling also identifies the filing requirements applicable to electric service providers (ESPs).

The Commission has adopted a framework for consideration of RPS Procurement Plans for electric corporations in prior decisions. The most recent

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<sup>1</sup> Pub. Util. Code § 399.13(a)(1) orders the Commission to "direct each electric corporation to annually prepare a renewable energy procurement plan...to satisfy its obligations under the renewables portfolio standard." All subsequent code section references are to the Public Utilities Code unless otherwise indicated.

<sup>2</sup> § 365.1 was enacted by Senate Bill (SB) 695 (Kehoe, Stats. 2009, ch.337) and provides, among other things, for the phased and limited reopening of direct access transactions in the service territories of the three large utilities. The statute also requires that, once the Commission has begun the process of reopening direct access, the Commission shall equalize certain program requirements between the three large utilities and "other providers," including ESPs. Section 365.1 expressly exempts community choice aggregators from its requirements and does not address small and multi-jurisdictional utilities. Consequently, D.11-01-026 did not address RPS procurement requirements as they apply to community choice aggregators or small and multi-jurisdictional utilities.

<sup>3</sup> Pursuant to § 365.1, D.11-01-026 *Decision Revising Rules for the Renewables Portfolio Standard Pursuant to Senate Bill 695* found that almost all significant RPS requirements currently apply equally to large investor-owned utilities (IOUs) and ESPs. The decision adds to the RPS obligations of ESPs, such as the filing of RPS Procurement Plans for Commission approval. D.11-01-026 at Ordering Paragraph 1.

decision is D.14-11-042.<sup>4</sup> Consistent with the general process referred to in D.14-11-042, other prior Commission decisions, and the requirements in SB 2 1X,<sup>5</sup> this ruling requires the filing of proposed RPS Procurement Plans for 2015 and sets forth the information required therein. After the Commission considers these proposed procurement plans, the Commission will issue a decision on these plans, consistent with the direction set forth in § 399.13(a)(1).<sup>6</sup>

Additional background on the RPS procurement process, such as the solicitation timeline, is set forth below together with the issues to be considered and the procedural schedule at Attachment A.

## **2. General Requirements for 2015 RPS Procurement Plans**

The Order Instituting Rulemaking (OIR) initiating this proceeding was adopted by the Commission on February 26, 2015. An initial prehearing conference was held on April 16, 2015.

In D.12-11-016, the Commission refined the RPS Procurement process as part of its implementation of SB 2 1X. The Commission has now implemented SB 2 1X in several Commission decisions, including D.11-12-020,<sup>7</sup> D.11-12-052,<sup>8</sup>

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<sup>4</sup> *Decision Conditionally Accepting 2013 Renewables Portfolio Standard Procurement Plans and Integrated Resource Plan On-Year Supplement* (November 14, 2013, R.11-05-005). In D.13-11-024, the Commission adopted RPS Procurement Plans for the year 2013.

<sup>5</sup> SB 2 1X (Simitian, Stats. 2011, ch.1) enacted in the First Extraordinary Session of the Legislature (effective December 10, 2011).

<sup>6</sup> § 399.13(a)(1) states that the Commission shall review and accept, modify, or reject each utilities' RPS Procurement Plan prior to the commencement of renewable energy procurement pursuant to this Article 16 of the Pub. Util. Code.

<sup>7</sup> *Decision Setting Procurement Quantity Requirements for Retail Sellers for the Renewables Portfolio Standard Program*, December 1, 2011.

D.12-05-035,<sup>9</sup> D.12-06-038,<sup>10</sup> D.13-05-034,<sup>11</sup> and D.14-12-023.<sup>12</sup> These Commission decisions contain directives that require modifications to the RPS Procurement process. Compliance with those directives when developing all future RPS procurement plans is required. The details of these decisions are not repeated here.

Consistent with the Commission's decisions and applicable legislative changes, compliance with all of the requirements set forth below is required by Pacific Gas and Electric Company (PG&E), Southern California Electric Company (SCE), San Diego Gas & Electric Company (SDG&E) (collectively investor-owned utilities or IOUs). Small and multi-jurisdictional utilities are subject to a subset of the requirements set forth below. ESPs are also subject to a subset of these requirements, as described below.

Attachment A is the procedural schedule for the Commission's review of the 2015 RPS Procurement Plans. Updates to the filed proposed 2015 RPS

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<sup>8</sup> *Decision Implementing Portfolio Content Categories for the Renewables Portfolio Standard Program*, December 15, 2011.

<sup>9</sup> *Decision Revising Feed-In Tariff Program, Implementing Amendments to § 399.20 Enacted by SB 380, SB 32, and SB 2 1X, and Denying Petition for Modification of D.07-07-027*, May 24, 2012. D.13-01-041 denied rehearing of D.12-05-035 as modified, *Order Modifying Decision (D.) 12-05-025, and Denying Rehearing of Decision, as Modified*, January 24, 2013.

<sup>10</sup> *Decision Setting Compliance Rules for the Renewable Portfolio Standard Program*, June 21, 2012.

<sup>11</sup> *Decision Adopting Joint Standard Contract for Section 399.20 Feed-In Tariff Program and Granting, in Part, Petitions for Modification of Decision 12-05-035*, May 23, 2013.

<sup>12</sup> *Decision Setting Enforcement Rules for the Renewables Portfolio Standard Program, Implementing Assembly Bill 2187, and Denying Petitions for Modification of Decision 12-06-038*, December 4, 2014.

Procurement Plans may be provided consistent with the schedule at Attachment A.

In the OIR , it was preliminarily scoped to explore increasing the RPS procurement requirement pursuant to authority given to the Commission by Assembly Bill (AB) 327 (Perea), Stats. 2013, ch. 611. In addition, Governor Edmund G. Brown Jr. has recently expressed plans to increase the amount of renewable energy to address the state’s greenhouse gas reduction goals and has issued Executive Order B-30-15 to reduce greenhouse gas emissions. Given that the Commission or Legislature may consider an increase in the RPS procurement requirements, it is reasonable for this year’s RPS Procurement Plans to consider both the current procurement quantity requirements, as implemented in D.11-12-020, and the following increased requirements.

**Table 1: Higher RPS Requirement**

<b>Compliance period</b>	<b>Procurement percentage</b>
2021	33%
2022	37%
2023	37%
2024	40%

Therefore, all draft 2015 RPS Plans should include responses to the *Specific Requirements for 2015 RPS Procurement Plans* (Section 6), considering both a 33 percent by 2020 requirement and a 40 percent by 2024 requirement. For example, when describing RPS portfolio supplies and demands, responses

should consider the two different quantity requirements. For instances where a response would not differ, that should be clearly stated.<sup>13</sup>

### **3. Utilities Subject to § 399.17**

SB 2 1X revised the RPS procurement requirements for multi-jurisdictional utilities and their successors<sup>14</sup> to allow these utilities to meet their RPS procurement obligations without regard to the portfolio content category limitations in § 399.16.<sup>15</sup> It also continued the ability of a multi-jurisdictional utility, i.e., PacifiCorp, to use an Integrated Resource Plan (IRP) prepared for regulatory agencies in other states to satisfy the annual RPS Procurement Plan requirement so long as the IRP complies with the requirements specified in § 399.17(d). PacifiCorp prepares its IRP on a biennial schedule, filing its plan in odd numbered years. It files a supplement to this plan in even numbered years.

As required by D.08-05-029, PacifiCorp must file and serve its IRP in Rulemaking (R.) 06-05-027 or its successor proceeding at the same time it files with the jurisdictions requiring the IRP and an IRP Supplement within 30 days of filing its IRP. PacifiCorp filed its 2015 IRP on March 31, 2015 and its “on year” supplement to its 2015 IRP on April 30, 2015. Pursuant to D.11-04-030,

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<sup>13</sup> If preferred, 2015 RPS Plans could be filed as two distinct versions. That is, one version that includes all procurement plan requirements in the context of a 33 percent RPS requirement and a separate version that includes all procurement plan requirements in the context of a 40 percent by 2024 RPS requirement.

<sup>14</sup> PacifiCorp is a multi-jurisdictional utility for RPS purposes. Liberty Utilities LLC is a successor entity under § 399.17 and not a multi-jurisdictional utility because it has customers only in California.

<sup>15</sup> § 399.17(b).

PacifiCorp will not file a comprehensive supplement this year because it filed its IRP this year.<sup>16</sup>

Liberty Utilities LLC, on the other hand, does not prepare an IRP because it is not subject to the jurisdiction of another state. It should, therefore, prepare an RPS Procurement Plan subject to the same requirements as a small utility under § 399.18.

#### **4. Utilities Subject to § 399.18**

SB 2 1X makes special provisions for the two small utilities existing at the time the legislation was drafted.<sup>17</sup> Section 399.18(b) allows a small utility to meet the RPS procurement obligations without regard to the portfolio content category limitations in § 399.16.

A small utility must file a procurement plan pursuant to § 399.13(a)(5), but it should be tailored to the limited customer base and the limited resources of a small utility.

Accordingly, BVES, as well as Liberty Utilities LLC, should prepare an RPS Procurement Plan providing the information required in Section 4 of this ruling.

#### **5. Electric Service Providers**

As provided in D.11-01-026, ESPs must file RPS Procurement Plans. Many of the requirements of § 399.13(a)(5) do not reasonably apply to ESPs because the

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<sup>16</sup> In years that PacifiCorp does not file an IRP, a supplement is filed by July 15. This supplement is to include an analysis of how the IRP and supplement comply with the requirements in § 399.17(d).

<sup>17</sup> § 399.18(a)(1) describes Bear Valley Electric Service (BVES); § 399.18(a)(2) describes the former Mountain Utilities. Mountain Utilities was purchased by Kirkwood Public Utility per D.11-06-032. Mountain Utilities is no longer considered a retail seller subject to the Commission's RPS jurisdiction.



Commission does not set their rates or rates of return. Therefore, each ESP must file a proposed RPS Procurement Plan that complies with the requirements of sections below.

**6. Specific Requirements for 2015 RPS Procurement Plans**

As discussed in this section, the 2015 Procurement Plans must include all information required by statute as well as quantitative analysis supporting the retail seller's assessment of its portfolio and future procurement decisions.

Responses to all sections, except Sections 6.5 and 6.9, shall be provided qualitatively in writing. Responses to Section 6.5 shall be provided in a numerical/quantitative format to support the written responses to Sections 6.1 - 6.4, and 6.6. The information in the Procurement Plans should be non-confidential, to the greatest extent possible, and all sources of information must be identified with citations, if any. All assumptions underlying these responses must be clearly stated.

When filed with the Commission, all of the proposed 2015 RPS Procurement Plans must achieve the following:

1. Describe the overall plan for procuring RPS resources for the purposes of satisfying the RPS program requirements while minimizing cost and maximizing value to ratepayers. This includes, but is not limited to, any plans for building utility-owned resources, investing in renewable resources, and engaging in the sales of RPS eligible resources.
2. The various aspects of the plans themselves must be consistent. For instance, the bid solicitation protocol should be consistent

- with any statements and calculations regarding a utility's renewable net short position.<sup>18</sup>
3. The plans should be complete in describing and addressing procurement (and sales) of RPS eligible resources such that the Commission may accept or reject proposed contracts based on consistency with the approved plan, including any calculation of RPS procurement net short position.<sup>19</sup>
  4. IOUs should work collaboratively to make the format of the plans as uniform as possible to enable parties, bidders, and the Commission to easily access, review and compare the plans.
  5. All plan elements should comply with the requirements set out in Section 2.1.

**6.1. Assessment of RPS Portfolio Supplies and Demand - § 399.13(a)(5)(A)**

Provide a written description assessing annual and multi-year portfolio supplies and demand in relation to RPS requirements, the RPS program, and the RPS program's overall goals to determine the retail seller's optimal mix of eligible renewable energy resources.

The assessment should consider, at a minimum, a 20-year time frame with a detailed 10-year planning horizon that takes into account both portfolio supplies and demand. This written description must include the retail seller's need for RPS resources with specific deliverability characteristics, such as, peaking, dispatchable, baseload, firm, and as-available capacity as well as any additional factors, such as ability and/or willingness to be curtailed, operational flexibility, etc.

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<sup>18</sup> As of the date of this ruling, the methodology can be found at the May 21, 2014 ruling, *Administrative Law Judge's Ruling on Renewable Net Short*.

<sup>19</sup> Section 399.13(d)

This written description must also explain how the proposed renewable energy portfolio will align with expected load curves and durations, as well as how it optimizes cost, value, and risk for the ratepayer. Where applicable, the assessment should also identify and incorporate impacts of overall energy portfolio and system requirements (not just RPS portfolio requirements), recent legislation, other Commission proceedings (e.g., R.13-12-010, the long-term procurement plans proceeding), other agencies requirements, and other policies or issues that would impact RPS demand and procurement.

The written description should also explicitly and specifically address, both qualitatively and quantitatively, to the extent possible, how the buyer intends to increase the diversity in its portfolio overall, to address issues of grid integration, potential for overgeneration, and ratepayer value.

Additionally, the assessment should describe and incorporate RPS lessons learned over the past year, including RPS trends and potential future trends. Lastly, it must also explain how the quantitative analysis provided in response to section 6.5 supports the assessment.

**6.2. Project Development Status Update -  
§ 399.13(a)(5)(D)**

Provide a written status update on the development schedule of all eligible renewable energy resources currently under contract but not yet delivering generation. This written status update should differentiate status updates based on whether projects are pre-construction, in construction, or post-construction. The status updates provided in the written description must be reflected in the quantitative analysis provided in response to Section 6.5, below. Given this analysis, discuss how the status updates will impact the retail seller's net short

and its procurement decisions for the next two years and on a ten-year planning horizon.

**6.3. Potential Compliance Delays -  
§ 399.13(a)(5)(B)**

Describe in writing any potential issues that could delay RPS compliance, including, but not limited to, inadequate transmission capacity, delayed substation construction, permitting, financing, unanticipated curtailment, and the relationship, if any, to project development delays, reduced generation, and compliance delays. Describe the steps taken to account for and minimize these potential compliance delays. The potential compliance delays included in the written description must be reflected in the quantitative analysis provided in response to Section 6.5. Given this analysis, discuss how the potential compliance delays will impact the retail seller's RPS net short and its procurement decisions.

**6.4. Risk Assessment - § 399.13(a)(5)(F)**

Provide a written assessment of the risk in the RPS portfolio in relation to RPS compliance requirements. Risk assessment should describe risk factors such as those described above regarding compliance delays, as well as, but not limited to, the following: lower than expected generation, variable generation, resource availability (e.g., biofuel supply, water, etc.), load changes, and impacts to eligible renewable energy resource projects currently under contract. The risk assessment provided in the written description must be reflected in the quantitative analysis provided in response to Section 6.5. Given this analysis, discuss how the risk assessment will impact the retail seller's net short and its procurement decisions. The written assessment must explain how quantitative analysis provided in response to Section 6.5 supports this response.

**6.5. Quantitative Information - §§ 399.13(a)(5)(A), (B), (D) and (F)**

In addition to the written descriptive responses to Sections 6.1 through 6.4, provide quantitative data, methodologies, and calculations relied upon to assess the retail seller's RPS portfolio needs and RPS procurement net short. This quantitative analysis must take into account, where appropriate, the quantitative discussion requirement by Sections 6.1-6.4, above. Any RPS-eligible procurement that has or will occur outside of the RPS program should also be included.<sup>20</sup> As stated above, the portfolio assessment should be for a minimum of 20 years in the future. The responses must be clear regarding the quantitative progress made towards RPS requirements and the specific risks to the electrical corporation's RPS procurement portfolio. Risks may include, but are not limited to, project development, regulatory, and market risks. The quantitative response must be provided in an Excel spreadsheet based on the most recently directed renewable net short methodology.<sup>21</sup>

**6.6. "Minimum Margin" of Procurement - § 399.13(a)(4)(D)**

Section 399.13(a)(4)(D) provides, in part, that the Commission shall adopt, by rulemaking, "[a]n appropriate minimum margin of procurement above the minimum procurement level necessary to comply with the renewables portfolio standard to mitigate the risk that renewable projects planned or under contract are delayed or canceled."

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<sup>20</sup> For example, RPS-eligible procurement to replace generation from the retired San Onofre Nuclear Generation Station that will be applied towards RPS requirements should be included.

<sup>21</sup> As of the date of this ruling, the methodology directed in the Administrative Law Judge's May 21, 2014 ruling, *Administrative Law Judge's Ruling on Renewable Net Short* is the most recent renewable net short methodology.

This ruling directs PG&E, SCE, and SDG&E to identify in their proposed 2015 RPS Procurement Plans the assumed minimum margin of procurement above the minimum procurement level necessary to comply with the RPS program to mitigate the risk that renewable projects under contract are delayed or terminated.

Each proposed 2015 RPS Procurement Plan shall include a methodology and inputs regarding the utility's proposed minimum margin of over-procurement metric. The methodology should be representative of and consistent with the utility's inputs and assumptions in Section 6.5. Also, the metric should be used to calculate the utility's procurement needs pursuant to Section 6.5. Additionally, use of any sensitivities or scenarios should be described. If the utility's assumed minimum margin of over-procurement is not used to calculate a utility's net short provided in response to Section 6.5, then the utility should clearly describe the reasons and any assumptions or other additional methodologies used to calculate the utility's proposed over-procurement. Reasons and assumptions should be supported with quantitative information to the extent possible.

**6.7. Bid Solicitation Protocol, Including Least Cost Best Fit Methodologies - § 399.13(a)(5)(C) and D.04-07-029**

Pursuant to § 399.13(a)(5)(C), 2015 RPS Procurement Plans must include a bid solicitation protocol setting forth the need for eligible renewable energy resources. If selling eligible renewable energy is part of a 2015 RPS Plan, then a solicitation protocol setting forth the available eligible renewable energy should also be included. Solicitations shall be consistent with portfolio assessment provided in Sections 6.1 through 6.5 and the utility's renewable net short position. Additionally, solicitations should be specific regarding what quantity

of products are being requested (or offered) and the required deliverability characteristics, online dates, term lengths, and locational preferences. The bid solicitation protocols should include, an overview of the solicitation process, a solicitation schedule, pro forma agreement(s), and a detailed description of the utility's least-cost best-fit (LCBF) methodology. The LCBF methodology should be consistent with D.04-07-029, D.11-04-030, and D.12-11-016. Also, it should clearly describe criteria (e.g., energy value, congestion cost, locational preference, term length, ability to be curtailed, operational flexibility, etc.) and how bids will be valued and evaluated based on the LCBF methodology. Any qualitative measures that will be used in LCBF methodology should also be described, both in terms of the criteria and how they will be used in the methodology.

As stated above, RPS Procurement Plans should take into account not only procurement needs to meet or exceed RPS requirements,<sup>22</sup> but also overall energy portfolio needs and system requirements. The LCBF process is one particular area where the intersection of issues is vital because not only is the cost of the potential contract evaluated, but also costs and benefits related to transmission, congestion, and capacity. In D.14-11-042, PG&E, SCE, and SDG&E were required to provide bid rankings using resource adequacy valuations calculated with Net Qualifying Capacities based on (1) the exceedance methodology and (2) an effective load carrying capability methodology.

An integration cost adder is currently part of the Commission's required LCBF bid evaluation methodology. In D.14-11-042 the Commission adopted an

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<sup>22</sup> Both current RPS requirements and the additional requirements proposed in Section 2.1 must be included.

interim integration adder methodology and stated that going forward a comprehensive methodology would be considered in coordination with the LTPP proceeding and that a decision adopting a final integration cost adder valuation may occur in either proceeding. Additionally, the Commission stated that the interim cost adder valuation is to remain in place until a final valuation is adopted by the Commission. At this time, a final integration cost adder has not yet been adopted.<sup>23</sup> As such, PG&E, SCE, and SDG&E shall include in their 2015 solicitation protocol the interim integration adder valuation methodology adopted in D.14-11-042.

**6.8. Consideration of Price Adjustment Mechanisms - § 399.13(a)(5)(E)**

Pursuant to § 399.13(a)(5)(E), describe how price adjustments (e.g., index to key components, index to Consumer Price Index, price adjustments based on exceeding transmission or other cost caps, etc.) will be considered and potentially incorporated into contracts for RPS-eligible projects with online dates occurring more than 24 months after the contract execution date. Discuss how the price adjustments will maximize value for ratepayers and minimize potential risks to ratepayers.

In D.14-11-042, the Commission approved curtailment terms and conditions in PG&E, SCE's, and SDG&E's pro forma contracts; required multiple bid variants related to economic curtailment; and directed reporting on

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<sup>23</sup> On March 27, 2015 *Administrative Law Judge's Ruling directing Southern California Edison Company to perform production cost simulations for the interim variable integration cost adder* was issued in R.13-12-010, which directed the IOUs to run simulation modeling to refine the interim renewable integration adder by developing California-specific variable component values.



curtailment frequency, forecasting, and costs. In addition, D.14-11-042 stated that the utilities should continue to report on observations and issues related to economic curtailment as well as any actions and analysis.

### **6.9. Expiring Contracts**

PG&E, SCE, and SDG&E are directed to include in their 2015 RPS Procurement Plans information on contracts expected to expire in the next ten years. This information should be provided in a list form, such as an Excel document or similar format that includes the following data: name of the facility, MW, expected annual generation (GWh), contract expiration year, technology, contract type, and location. Assumptions related to expiring contracts and effects on RPS portfolios and planned procurement should also be noted, where relevant, in response to several of the above sections (e.g., Sections 6.1 and 6.5).

### **6.10. Cost Quantification**

Pursuant to SB 836 (Padilla, Stat. 2011, ch. 600, § 1)<sup>24</sup> and SB 2 1X, the Commission provided reports to the California Legislature on May 1, 2015. The Commission's May 2015 Padilla Report included cost data on all procurement contracts for eligible renewable energy resources approved by the Commission.<sup>25</sup> The information in the report was provided to the Commission by PG&E, SCE, and SDG&E and is grouped into the following broad categories: the utility, the type of technology, and the year (for each year from 2003 through 2013). The

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<sup>24</sup> Adding § 911 to the Pub. Util. Code.

<sup>25</sup> *The Padilla Report to the Legislature, The Costs of Renewables in Compliance with Senate Bill 836 (Padilla, 2011)*. This report can be found at <http://www.cpuc.ca.gov/PUC/energy/Renewables/index.htm>.

Commission’s Section 910 Report provided data on PG&E’s, SCE’s, and SDG&E’s 2014 direct and indirect costs associated with the RPS program and distributed generation programs, as well as other information related to the three large utilities’ procurement and administrative activities.<sup>26</sup>

To support the Commission’s reporting to the Legislature pursuant to §§ 836 and 910, PG&E, SCE, SDG&E, Bear Valley, Liberty Utilities LLC, and PacifiCorp are required to include the information described in Table 1, below, in their proposed 2015 RPS Procurement Plans.

The electrical corporations shall coordinate to provide responses using a standardized methodology and format. Responses should be non-confidential to the greatest extent possible.

**Table 1**  
**RPS Procurement Information Related to Cost Quantification**

Row	Item	Description
1.	Actual Direct Expenditures - per year	Total dollars expended on all RECs <sup>27</sup> for every year from 2003 to present year.  Direct Expenditures shall be reported by resource and technology type and reported for each year.
2.	Actual REC Procurement (MWh) - per year	Total REC procurement for every year from 2003 to present year.  Amounts shall be reported by resource and technology type and reported for each year.

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<sup>26</sup> Commission’s Report to the Legislature in Compliance with Pub. Util. Code § 910. This report can be found <http://www.cpuc.ca.gov/PUC/energy/Renewables/index.htm>.

<sup>27</sup> For all information provided in response to Table 1, REC-only contracts should be listed separately.

3.	Forecast Direct Expenditures - per year	Total forecasted dollar expenditures for all RPS-eligible procurement approved to date <sup>28</sup> . Forecasts Direct Expenditures shall be reported by resource and technology type and reported for each year from 2015-2030.
4.	Forecast REC Procurement (MWh) - per year	Total forecasted REC procurement approved to date. Forecasts shall be reported by resource and technology type and reported for each year.
5.	Incremental Rate Impact - per year	Total actual and forecasted annual rate impacts from RPS procurement from 2003-2030.

### 6.11. Imperial Valley

In D.14-11-042, the Commission stated that “PG&E, SCE, and SDG&E shall provide a specific assessment of the offers and contracted projects in Imperial Valley region in future RPS Procurement Plans filed with the Commission pursuant to §§ 399.11 *et seq.* until directed otherwise.”<sup>29</sup>

While restating this directive here is not necessary, we do so to further support our commitment to the continued monitoring of the utilities’ procurement activities in the Imperial Valley area and renewable projects’ utilization of the Sunrise Powerlink Transmission Project in recognition of the Commission’s commitment that Sunrise Powerlink is “used efficiently, equitably and wisely.”<sup>30</sup> This directive refers to the Commission’s prior determinations that granted SDG&E a Certificate of Public Convenience and Necessity for the Sunrise Transmission project and directed the Commission to consider several

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<sup>28</sup> “to date” means the date this ruling is issued.

<sup>29</sup> D.14-11-042 at 19.

<sup>30</sup> D.09-06-018 at 15.

proposals so that the renewable resources that are facilitated by Sunrise are developed on a timely basis.<sup>31</sup>

The Commission's commitment to this matter was most recently reaffirmed in the decision accepting the 2014 RPS Procurement Plans.<sup>32</sup>

Specifically, we direct PG&E, SCE, and SDG&E to report on the Imperial Valley results from the 2014 solicitation, any CPUC-approved RPS power purchase agreements for projects in the Imperial Valley that are under development, and any RPS projects in the Imperial Valley that have recently achieved commercial operation.

#### **6.12. Important Changes to Plans Noted**

A statement identifying and summarizing the important changes between the 2014 and 2015 RPS Procurement Plans must be included. This summary should not be a reprint of the two plans with strike-out and underlined inserts. In addition to identifying and summarizing the important changes, the plan should also include an explanation and justification of the reasonableness for each important change from 2014 to 2015.

#### **6.13. Redlined Copy of Plans Required**

A version of the 2015 RPS Procurement Plan that is "redlined" to identify the changes from the 2014 plan must be included with the 2015 RPS Procurement Plans. The IOUs must provide a redlined copy for the Commission's Energy

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<sup>31</sup> D.08-12-058, *Decision Granting a Certificate of Public Convenience and Necessity for the Sunrise Powerlink Transmission Project* at 266-268; D.09-06-018 directed a special Imperial County bidders' conference and specific monitoring of Imperial Valley proposals at 11-16.

<sup>32</sup> D.14-11-042 at 15-19.

Division Staff, the ALJ, and any party who requests a copy. (This is separate from the Important Changes item above.)

#### **6.14. Safety Considerations**

As stated in D.11-11-042, all entities filing RPS Procurement Plans must incorporate a section on safety considerations.

#### **7. Schedule**

Parties may file comments, reply comments and other pleadings in response to the RPS Procurement Plans and the Supplement. The schedule is set forth at Attachment A. After review of the record in the proceeding, the Commission will accept, modify, or reject each plan or Supplement as required by §§ 399.14(a)(1) and (c).

#### **IT IS RULED that:**

1. As required by Section 399.13(a)(5) of the Public Utilities Code, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall each file a proposed 2015 Renewables Portfolio Standard Procurement Plan that addresses the elements stated herein.
2. As required by Section 399.13(a)(5) of the Public Utilities Code and Decision 08-05-029, PacifiCorp shall file its proposed Supplement that address the elements stated herein.
3. As required by Section 399.13(a)(5) of the Public Utilities Code, Bear Valley Electric Service and Liberty Utilities LLC shall file a proposed 2015 Renewables Portfolio Standard Procurement Plans that addresses the elements stated herein.
4. As required by Section 365.1 of the Public Utilities Code and Decision 11-01-026, each Electric Service Provider shall file a proposed 2015 Renewables Portfolio Standard Procurement Plans to address the elements stated herein.

5. The procedural schedule for the Commission's consideration of the 2015 Renewables Portfolio Standard Procurement Plans and Supplement is set forth at Attachment A. This schedule may be adjusted as needed by the assigned Commissioner or Administrative Law Judge.

6. Comments on the issues and questions set forth herein may be submitted consistent with the schedule set forth at Attachment A.

Dated May 22, 2015, at San Francisco, California.

/s/ CARLA J. PETERMAN

Carla J. Peterman  
Assigned Commissioner

# **ATTACHMENT A**

**Attachment A**  
**Procedural Schedule**  
**2015 Renewables Portfolio Standard Procurement Plans**

<b>Row #</b>	<b>ITEM</b>	<b>DATE</b>
1	Assigned Commissioner's Ruling setting scope and schedule for annual RPS Procurement Plans	5/22/15
2	IOUs, Small Utilities, and ESPs file proposed annual RPS Procurement Plans	7/22/15
3	PacifiCorp files supplement to 2015 IRP.	7/22/15
4	Comments and Reply comments on Supplement	8/6/15, 8/11/15
5	Comments filed on RPS Plans, Supplement, and Issues and Questions in this Ruling	8/24/15
6	Motions requesting evidentiary hearing (note: If a motion is filed and granted, the ALJ may need to issue a revised schedule.)	8/28/15
7	Reply comments on RPS Plans, IRP and Ruling Issues/Questions	9/8/15
8	Motion to update RPS Plans [note 1 below]	9/30/15
9	Projected date for issuance of Proposed Decision	4th Quarter 2015
10	Projected date for Commission vote on Proposed Decision	4th Quarter 2015
11	IOUs issue Request For Offers for Solicitations or otherwise pursue approved RPS Procurement Plan	4th Quarter 2015

Note 1: Updates are not intended to alter the form and format of the plan but may be appropriate for limited elements based on changed circumstances or recent information (e.g., new legislation, recent Commission decision, new regulation of the California Independent System Operator, harmonization of definitions within contract for specific terms).

**(END OF ATTACHMENT A)**