



June 17, 2014

Rajinder Sahota
Chief, Climate Change Program Planning & Management Branch
California Air Resources Board
1001 I Street
Sacramento, CA 95812-2828

Filed Electronically

RE: TID Comments on June 2, 2014 Discussion Draft Amendments to the Mandatory Reporting Regulation.

Dear Ms. Sahota:

Turlock Irrigation District (“TID”) submits the following informal comments regarding the California Air Resources Board (“ARB”) June 2, 2014 *Proposed Amendments to the Mandatory Reporting Regulation* (“June 2nd Discussion Draft”). TID’s comments focus on the need to further refine and provide guidance on the requirements set forth in Section 95111(g)(1)(N): collection of meter data for electricity imports. As discussed below, TID supports the ARB’s proposed amendment to Section 95111(g)(1)(N), which would clarify that the meter data comparison requirement only applies to zero emissions and RPS eligible facilities. Consistent with requirements in the current RPS Guidebook, the meter data requirement should be further clarified to exclude “Grandfathered Resources” and unspecified imports that are used to firm and shape a Bucket 2 RPS transaction. TID also requests that the ARB provide guidance language with examples of how the meter data comparison should be conducted.

TID appreciates the ARB’s attentiveness to the administrative concerns TID and other parties raised in the 2013 MRR rulemaking. The proposed amendments to Section 95111(g)(1)(N) in the June 2nd Discussion Draft strike a reasonable balance between addressing administrative concerns, and the concerns of other parties regarding over-scheduling of RPS resources. Since the RPS verification process already requires a comparison of schedule data and generation data, the proposed amendments will minimize the administrative burden by allowing reporting entities to make efficient use of their RPS verification data.

The ARB should seek additional parity with RPS requirements by excluding “Grandfathered Resources” from the “lesser-of-analysis”. Grandfathered Resources are RPS-contracts or resources procured before June 1, 2010 that meet the requirements for

RPS procurement when the contracts were executed.¹ Grandfathered Resources do not have a direct delivery requirement and have been specifically excluded from a lesser-of-analysis for purposes of RPS verification.² TID requests that Section 95111(g)(1)(N) be further clarified to achieve parity with the RPS laws and specifically exclude Grandfathered Resources.

In addition, the Regulation should be clarified to only apply to specified resources. It would be infeasible to prepare a lesser-of-analysis for the unspecified imports needed to support a “Bucket 2” firming and shaping transaction.

To effectuate these changes, Section 95111(g)(1)(N) should be revised as follows (TID’s proposed revisions are in bold and underline):

(N) For verification purposes, retain meter generation data **from all specified sources** to document that the power claimed by the reporting entity was generated by the facility or unit at the time the power was directly delivered. For all imports from specified sources for which ARB has calculated an emission factor of zero, and for imports from California Renewable Portfolio Standard (RPS) eligible resources (excluding RPS eligible resources that qualify as “count-in-full” under Public Utilities Code Section 399.16(d)) a lesser of analysis is required, and must be conducted according to the follow equation:

Sum of Lesser of MWh = $\Sigma HM_{sp} \min(MG_{sp}, TG_{sp})$

Where:

ΣHM_{sp} = Sum of the Hourly Minimum of MG_{sp} and TG_{sp} (MWh).

MG_{sp} = metered facility or unit net generation (MWh).

TG_{sp} = tagged or transmitted energy at the transmission or sub-transmission level imported to California (MWh).

Finally, TID requests that the ARB issue guidance language on Section 95111(g)(1)(N) prior to the next reporting deadline. It would be helpful to see illustrative examples of the lesser-of-analysis, including a discussion of how a multi-hour e-tags would be addressed in the lesser-of-analysis. TID appreciates the opportunity to provide these comments and looks forward to working with the ARB on this and other reporting issues germane to the electricity sector. If you have any questions about these comments, please contact Ken R. Nold at knold@tid.org

Sincerely,

/s/

Ken R. Nold
Turlock Irrigation District

¹ Cal. Pub. Util. Code Sec. 399.16(d).

² See *Renewable Portfolio Standard Eligibility, Seventh Edition, Commission Guidebook*, p. 98, available at: <http://www.energy.ca.gov/2013publications/CEC-300-2013-005/CEC-300-2013-005-ED7-CMF-REV.pdf>