Procurement and Use of Energy for Green Power Service Customers

Procurement and utilization of energy for customers taking service under Pasadena's "Green power service" option ("Green Power Option") are addressed the Renewable Portfolio Standard ("RPS") procurement plan and enforcement program documents. These documents are reviewed and approved by the City Council on a periodic basis. Relevant excerpts from the current versions of these documents, as adopted by the City Council on December 10, 2018, are shown below.

RPS Procurement Plan:

For a customer participating in the Green Power Option or any shared renewable generation project, the RECs associated with electricity credited to such customer under the program will not be used by PWP for compliance with state mandated RPS procurement requirements. The RECs will be retired on behalf of the participating customer, and may not be further sold, transferred, or otherwise monetized for any purpose. Under these programs, PWP will seek to procure generation from eligible renewable energy resources that are located in reasonable proximity to participants to the extent possible.

SB 350 further clarifies that Retail Sales may exclude sales to customers taking service under the optional Green Power Option or any shared renewable generation program...

RPS Enforcement Program:

Retail Sales may exclude sales to customers taking service under the optional Green Power Option (PMC 13.04.179) or any shared renewable generation program.

For a customer participating in the Green Power Option or any shared renewable generation project, if the renewable energy is excluded from the calculation of Retail Sales, the Portfolio Content Category ("PCC") 1 Renewable Energy Credits ("RECs") associated with the electricity credited to such customer under the program will not be used by PWP for compliance with state mandated RPS procurement requirements. The RECs will be retired on behalf of the participating customer, and may not be further sold, transferred, or otherwise monetized for any purpose. To the extent possible, the electricity products excluded from retail sales will be procured by PWP from eligible renewable energy resources that are located in the PWP service territory and in reasonable proximity to program participants.

If the City Council establishes RPS goals for PWP higher than the California Procurement Targets, or procures energy to serve PWP Green Power Option customers taking service under PMC 13.04.179 or a shared renewables program, the eligible renewable resources procured in excess of the statutory minimum shall be deemed voluntary and not subject to:

- 1. Any mandatory enforcement provisions under State rules or regulations;
- 2. Any restriction from carry over or banking provisions to subsequent Compliance Periods; sale, purchase or exchange; or any other use;
- 3. Any requirements for or restrictions on portfolio content categorization; or,
- 4. Any reporting or Public Notice required by the CEC.