RESOLUTION NO. 2018 - 66

RESOLUTION ADOPTING AN AMENDMENT TO THE TURLOCK IRRIGATION DISTRICT'S RENEWABLE ENERGY RESOURCES PROCUREMENT PLAN

WHEREAS, Senate Bill 1078 requires the governing body of each local publicly owned electric utility to implement and enforce a Renewable Portfolio Standard; and

WHEREAS, Turlock Irrigation District (TID) adopted said policy on February 3, 2004, and amended said policy on June 27, 2006, July 17, 2007, and April 14, 2009 in accordance with the requirements of Senate Bill 1078; and

WHEREAS, Senate Bill 2 (First Extraordinary Session) was signed into law by California Governor Edmund G. Brown on April 12, 2011; and

WHEREAS, Senate Bill 2 (First Extraordinary Session) establishes that the governing board of the local publicly owned electric utility shall adopt a renewable resources procurement plan; and

WHEREAS, the California Energy Commission adopted final regulations, Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities, which implements the requirements of Senate Bill 2 (First Extraordinary Session) on October 1, 2013; and

WHEREAS, Provisions in the Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities establish that the governing body of a local publicly owned electric utility must adopt a Renewable Resources Procurement Plan within 60 days of the effective date of said regulations (December 1, 2013); and

WHEREAS, Senate Bill 350 was signed into law by California Governor Edmund G. Brown on October 7, 2015; and

WHEREAS, Senate Bill 350 establishes that the governing board of the local publicly owned electric utility shall adopt a renewable resources procurement plan; and

WHEREAS, the California Energy Commission adopted final regulations, Renewables Portfolio Standard Eligibility, which implements the requirements of Senate Bill 350 on April 27, 2017; and

WHEREAS, Senate Bill 100 was signed into law by California Governor Edmund G. Brown on September 10, 2018; and

WHEREAS, Senate Bill 100 establishes that the governing board of the local publicly owned electric utility shall adopt a renewable resources procurement plan; and

WHEREAS, the California Energy Commission adopted final regulations, Renewables Portfolio Standard Eligibility, which implements the requirements of Senate Bill 100 on September 10, 2018.
NOW THEREFORE, BE IT RESOLVED by the Board of Directors of the Turlock Irrigation District that the TID Renewable Energy Resources Procurement Plan, which is attached and made part of this resolution, is hereby adopted effective December 18, 2018, in accordance with the requirements of Senate Bill 100.

Moved by Director Santos, seconded by Director Macedo, that the foregoing resolution be adopted.

Upon roll call the following vote was had:

Ayes: Directors Santos, Frantz, Alamo, Macedo, Fernandes
Noes: Directors - None
Absent: Directors - None

The President declared the resolution adopted.

I, Tami Wallenburg, Executive Secretary to the Board of Directors of the TURLOCK IRRIGATION DISTRICT, do hereby CERTIFY that the foregoing is a full, true and correct copy of a resolution duly adopted at a regular meeting of said Board of Directors held the 18th day of December, 2018.

[Signature]
Executive Secretary to the Board of Directors of the Turlock Irrigation District
POWER SUPPLY ADMINISTRATION

MEMORANDUM

TO: Board of Directors

PREPARED BY: Ken Nold

DATE: 12-12-2018

RE: RPS Procurement Plan

Action Requested
Request the Board to Amend the Renewable Portfolio Standard Procurement Plan.

Discussion
In September of 2018, Governor Brown signed SB 100, modifying the Renewable Portfolio Standard (RPS) and establishing a statewide requirement for utilities to meet the goal of serving their retail load with 60% renewable energy by 2030. SB 100 reaffirmed the roles for the California Energy Commission (CEC) and the California Air Resources Board (CARB) with respect to the monitoring, compliance, and enforcement of the Publicly Owned Utilities (POU) RPS regulations and code. The CEC monitors, measures, and validates compliance. In any case of non-compliance the CEC refers their findings to CARB for potential enforcement action under the Health & Safety Code. The TID Board of Directors, along with TID management, has responsibility for developing, implementing, enforcing, and oversight of the TID Renewable Portfolio Standard (RPS) Program. The RPS Procurement Plan, originally adopted in Resolution 2004-9, was later amended in Resolutions 2006-46, 2007-62, 2009-24, and again in 2013-109 due to the California legislature enacting laws modifying the Renewable Portfolio Standard.

TID is on track to meet established procurement goals through our continued layering of incremental renewable energy purchases, e.g. Sunpower solar PPA and Loyalton biomass PPA, yet there is work to do to be compliant with regulations. The code implementing the RPS for POU’s per Public Utilities Code (PUC) Section 4, 399.30 is as follows:

(a). (1) To fulfill unmet long-term generation resource needs, each local publicly owned electric utility shall adopt and implement a renewable energy resources procurement plan that requires the utility to procure a minimum quantity of electricity products from eligible renewable energy resources, including renewable energy credits, as a specified percentage of total kilowatthours sold to the utility’s retail end-use customers, each compliance period, to achieve the targets of subdivision (c).

(2) Beginning January 1, 2019, a local publicly owned electric utility subject to Section 9621 shall incorporate the renewable energy resources procurement plan required by this section as part of a broader integrated resource plan developed and adopted pursuant to Section 9621.
The attached TID Renewable Resources Procurement Plan details how TID plans to comply with the RPS targets in the law and the regulation.
INTRODUCTION
Senate Bill (SB) 100, enacted in the 2018 Session of the California Legislature, modified the state's renewable portfolio standard (RPS) program and set forth new RPS requirements applicable to publicly owned utilities (POUs). TID, as a POU, must comply with the provisions of SB 100.

The TID Renewable Resources Procurement Plan consists of:
A. Purpose of the Procurement Plan
B. Compliance Periods
C. Procurement Targets
D. Portfolio Content Category definitions
E. Portfolio Content Category requirements
F. TID Renewable Portfolio
G. TID Renewable Projections, Compliance Plan
H. Optional Compliance Measures
I. Reporting

A. Purpose
In order to comply with Public Utilities Code §399.30(a), which states "To fulfill unmet long-term generation resource needs, each local publicly owned electric utility shall adopt and implement a renewable energy resources procurement plan that requires the utility to procure a minimum quantity of electricity products from eligible renewable energy resources, including renewable energy credits, as a specified percentage of total kilowatt-hours sold to the utility's retail end-use customers..." in order to achieve the procurement targets specified in SB 100.

B. Compliance Periods
   a. Compliance Periods- Defined in Public Utilities Code § 399.30(b)
      i. Compliance Period 1: January 1, 2011 to December 31, 2013, inclusive
      ii. Compliance Period 2: January 1, 2014 to December 31, 2016, inclusive
      iii. Compliance Period 3: January 1, 2017 to December 31, 2020, inclusive
      iv. Compliance Period 4: January 1, 2021 to December 31, 2024 inclusive
      v. Compliance Period 5: January 1, 2025 to December 31, 2027, inclusive
      vi. Compliance Period 6: January 1, 2028 to December 31, 2030, inclusive.

C. Procurement Targets of Renewable Energy Resources for each Compliance Period
   a. Renewable Energy Resources Procurement Targets- Defined in Public Utilities Code §399.30 (c)(1) and (2)
i. During Compliance Period 1, January 1, 2011 to December 31, 2013, TID shall procure eligible renewable energy resources equivalent to an average of twenty percent (20%) of retail sales.

ii. By the end of Compliance Period 2, December 31, 2016, TID shall procure eligible renewable energy resources equivalent to not less than twenty five percent (25%) of retail sales.

iii. By the end of Compliance Period 3, December 31, 2020, TID shall procure eligible renewable energy resources equivalent to not less than thirty three percent (33%) of retail sales.

iv. By the end of Compliance Period 4, December 31, 2024, TID shall procure eligible renewable energy resources equivalent to not less than forty four percent (44%) of retail sales.

v. By the end of Compliance Period 5, December 31, 2027, TID shall procure eligible renewable energy resources equivalent to not less than fifty two percent (52%) of retail sales.

vi. By the end of Compliance Period 6, December 31, 2030, TID shall procure eligible renewable energy resources equivalent to not less than sixty percent (60%) of retail sales.

vii. Commencing in 2031, and for each multiyear compliance period to be established by the California Energy Commission, TID shall procure eligible renewable energy resources equivalent to not less than sixty percent (60%) of retail sales.

D. Portfolio Content Categories

a. Portfolio Content Category 1 (PCC1)- (PUC § 399.16 (b)(1)(A,B))-Resources in this category must meet the following criteria:

i. Have a first point of interconnection with a California balancing authority, have a first point of interconnection with distribution facilities used to serve end users within a California balancing authority area, or are scheduled from the eligible renewable energy resource into a California balancing authority without substituting electricity from another source. The use of another source to provide real-time ancillary services required to maintain an hourly or sub-hourly import schedule into a California balancing authority shall be permitted, but only the fraction of the schedule actually generated by the eligible renewable energy resource shall count toward this portfolio content category.

ii. Have an agreement to dynamically transfer electricity to a California balancing authority.

b. Portfolio Content Category 2 (PCC2)- (PUC § 399.16 (b)(2))-Resources in this category are:

i. Firmed and shaped eligible renewable energy resource electricity products providing incremental electricity and scheduled in to a California balancing authority.

c. Portfolio Content Category 3 (PCC3)- (PUC § 399.16 (b)(3))- Resources in this category include:

i. Eligible renewable energy resource electricity products or any fraction of the electricity generated, including unbundled renewable energy credits that do not qualify as PCC1 or PCC2.

d. Portfolio Content Category 0 (PCC0)- (PUC § 399.16 (d))- Resources in this category include:

i. Any contract or ownership arrangement originally executed prior to June 1, 2010 for eligible renewable energy resources, and shall count in full towards the procurement requirements, if
all the conditions below are met. Grandfathered resources shall be counted for RPS compliance without regard to the limitations on the use of each portfolio content category as described in section E.

1. The renewable energy resource was eligible under the rules in place as of the date when the contract was executed.

2. Any contract amendments or modifications occurring after June 1, 2010, do not increase the nameplate capacity or expected quantities of annual generation, or substitute a different renewable energy resource.

3. The duration of the contract may be extended if the original contract specified a procurement commitment of fifteen or more years.

4. "Eligible renewable energy resource" means an electrical generating facility that meets the definition of a "renewable electrical generation facility" in section 25741 of the Public Resources Code, subject to the following: "A facility approved by the governing board of a local publicly owned electric utility prior to June 1, 2010, for procurement to satisfy renewable energy procurement obligations adopted pursuant to former section 387, shall be certified as an eligible renewable energy resource by the Energy Commission pursuant to this article, if the facility is a "renewable electrical generation facility" as defined in section 25741 of the Public Resources Code." (§ 399.12(e) (1) (C).)

E. Portfolio Content Category Requirements

a. Compliance Period 1 Procurement Requirements: For Compliance Period 1, TID shall procure not less than fifty percent (50%) of the eligible renewable energy resource products associated with contracts executed after June 1, 2010 from PCC 1, and not more than twenty five percent (25%) from PCC 3.

b. Compliance Period 2 Procurement Requirements: For Compliance Period 2, TID shall procure not less than sixty five percent (65%) of the eligible renewable energy resource products associated with contracts executed after June 1, 2010 from PCC 1, and not more than fifteen percent (15%) from PCC 3.

c. Compliance Period 3 Procurement Requirements: For Compliance Period 3, TID shall procure not less than seventy five percent (75%) of the eligible renewable energy resource products associated with contracts executed after June 1, 2010 from PCC 1, and not more than ten percent (10%) from PCC 3.

d. Annual Procurement Requirements After 2020: Beginning in calendar year 2021, TID shall procure not less than seventy five percent (75%) of the eligible renewable energy resource products associated with contracts executed after June 1, 2010 from PCC 1, and not more than ten percent (10%) from PCC 3.

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1 It should be noted that even though Publicly Owned Utilities were able to count Large Hydro under former section 387, this precludes Large Hydro (over 30 MW) from counting towards RPS requirements, as Public Resource Code 25741 defines "renewable electrical generation facility" as follows: "The facility uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and any additions or enhancements to the facility using that technology."

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e. Requirements Matrix:

<table>
<thead>
<tr>
<th>Compliance Period</th>
<th>Year</th>
<th>CEC Renewables Procurement Target</th>
<th>Portfolio Balancing</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>PCC 1</td>
</tr>
<tr>
<td>Compliance Period 1</td>
<td>2011</td>
<td>Average of 20%</td>
<td>≥ 50%</td>
</tr>
<tr>
<td></td>
<td>2012</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2013</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compliance Period 2</td>
<td>2014</td>
<td>20%</td>
<td>≥ 65%</td>
</tr>
<tr>
<td></td>
<td>2015</td>
<td>20%</td>
<td></td>
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<tr>
<td></td>
<td>2016</td>
<td>25%</td>
<td></td>
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<tr>
<td>Compliance Period 3</td>
<td>2017</td>
<td>27%</td>
<td>≥ 75%</td>
</tr>
<tr>
<td></td>
<td>2018</td>
<td>29%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>2019</td>
<td>31%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>2020</td>
<td>33%</td>
<td></td>
</tr>
<tr>
<td>Compliance Period 4</td>
<td>2024</td>
<td>44%</td>
<td>≥ 75%</td>
</tr>
<tr>
<td>Compliance Period 5</td>
<td>2027</td>
<td>52%</td>
<td>≥ 75%</td>
</tr>
<tr>
<td>Compliance Period 6</td>
<td>2030</td>
<td>60%</td>
<td>≥ 75%</td>
</tr>
</tbody>
</table>

F. Long-Term Procurement Requirement
a. Beginning January 1, 2021, at least sixty-five (65) percent of the procurement TID counts toward the renewables portfolio standard requirement of each compliance period shall be from its contracts of 10 years or more in duration or in its ownership or ownership agreements for eligible renewable energy resources.

G. TID Renewable Portfolio
a. Tuolumne Wind Project: 136.6 MW Wind Farm owned and operated by TID.
   i. Location: Klickitat County, WA
   ii. Expected Annual Generation: 432,851 Megawatt-hours (MWh)
   iii. Contract/Ownership Start Date: May 2009
   iv. Portfolio Content Category: PCC 0 (Grandfathered)

b. NCPA Geothermal: TID owns a share of the NCPA Geothermal Plants 1 & 2
   i. Location: Middletown, California
   ii. Expected Annual Generation: Roughly 50,000 MWh2
   iii. Contract/Ownership Start Date: 1986
   iv. Portfolio Content Category: PCC 0 (Grandfathered)

2 The geothermal project generation is expected to diminish gradually over time due to the slow degradation of the steam field used to power the units. This number represents the average expected generation from 2011-2020.
c. **TID Small Hydro**: TID owns and operates a fleet of four small Hydro units along the Tuolumne River and the TID Canal system (La Grange, Dawson, Turlock Lake, and Hickman). TID also operates, maintains, and has rights to the electrical output of five other small hydro units external to the TID service area (Frankenheimer, Woodward, Parker, Canal Creek, and Fairfield).
   i. Location: California
   ii. Expected Annual Generation: 80,000 MWh
   iii. Contract/Ownership Start Date:
       1. La Grange - 1907
       2. Dawson - 1983
       3. Turlock Lake - 1980
       4. Hickman - 1979
       5. Frankenheimer - 1983
       6. Woodward - 1982
       7. Parker - 1982
       8. Canal Creek - 1983
   iv. Portfolio Content Category: PCC 0 (Grandfathered)

d. **TID Solar Facility**: TID owns a 70 kW solar facility that that integrated into the TID parking structure.
   i. Location: California
   ii. Expected Annual Generation: 60 MWh
   iii. Contract/Ownership Start Date: 2009
   iv. Portfolio Content Category: PCC 0 (Grandfathered)

e. **TID Solar PPA**: TID has contracted a 20 year PPA with Sunpower for a 54 MW utility scale solar PV facility.
   i. Location: Kern County, California
   ii. Expected Annual Generation: 155,000 MWh
   iii. Contract Start Date: 2017
   iv. Portfolio Content Category: PCC 1

f. **TID SB1 Solar Rebates**: TID has rebated our customers on behind the meter solar PV installations.
   i. Location: TID Territory, California
   ii. Expected Annual Generation: 16,000 MWh
   iii. Contract Start Date: PCC1 prior to June 1, 2010 start date, PCC3 post June 1, 2010
   iv. Portfolio Content Category: PCC1 and PCC 3

g. **TID Bio-mass PPA**: TID has contracted a 5 year PPA with Loyalton bio-mass facility.
   i. Location: Loyalton, Californi
   ii. Expected Annual Generation: 10,000 MWh
   iii. Contract Start Date: April 2018
   iv. Portfolio Content Category: PCC 1

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3 Based on average hydro conditions
H. TID Renewable Projections, Compliance Plan:

a. TID shall retain exclusive control and discretion over the mix of eligible renewable energy resources procured by TID and those additional generation resources procured by TID for purposes of ensuring resource adequacy and reliability, and the reasonable costs incurred by TID for eligible renewable energy resources owned by it, pursuant to § 399.30(m)

### TID RPS Compliance Projection

<table>
<thead>
<tr>
<th>Category</th>
<th>Compliance Period 1</th>
<th>Compliance Period 2</th>
<th>Compliance Period 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retail Sales (MWh)</td>
<td>1,894,540</td>
<td>1,956,531</td>
<td>1,985,531</td>
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<tr>
<td>RPS Requirements</td>
<td>378,908</td>
<td>391,306</td>
<td>397,106</td>
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<tr>
<td>PCCO</td>
<td>525,970</td>
<td>454,712</td>
<td>467,338</td>
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<tr>
<td>PCC1</td>
<td>0</td>
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</tr>
<tr>
<td>PCC3</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>HCO</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Annual Surplus/(Deficit)</td>
<td>147,062</td>
<td>63,406</td>
<td>70,232</td>
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<tr>
<td>Compliance Period Carryover</td>
<td>280,700</td>
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<table>
<thead>
<tr>
<th>Category</th>
<th>Compliance Period 4</th>
<th>Compliance Period 5</th>
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<tbody>
<tr>
<td></td>
<td>2021</td>
<td>2022</td>
<td>2023</td>
</tr>
<tr>
<td>Retail Sales (MWh)</td>
<td>2,133,560</td>
<td>2,139,409</td>
<td>2,147,236</td>
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<tr>
<td>RPS Requirements</td>
<td>762,748</td>
<td>823,673</td>
<td>885,735</td>
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<td>PCCO</td>
<td>503,063</td>
<td>499,679</td>
<td>500,217</td>
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<td>PCC1</td>
<td>167,513</td>
<td>167,114</td>
<td>162,356</td>
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<td>PCC3</td>
<td>18,613</td>
<td>18,568</td>
<td>18,040</td>
</tr>
<tr>
<td>Annual Surplus/(Deficit)</td>
<td>(73,559)</td>
<td>(138,312)</td>
<td>(204,123)</td>
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<tr>
<td>Compliance Period Carryover</td>
<td>205,365</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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4 RPS projections based on average hydro and wind conditions, and base case retail load projections.
I. Optional Compliance Measures

a. Excess Procurement:

i. Through 2020, TID can apply excess procurement from one compliance period to a subsequent compliance period, subject to the following provisions:
   1. Procurement classified in PCC3 may not be counted as excess procurement
   2. Procurement from contracts less than 10 years may not be counted as excess procurement.
   3. Excess Procurement accrual may start no earlier than January 1, 2011.

ii. After 2020, TID can apply excess procurement from one compliance period to a subsequent compliance period, subject to the following provisions:
   1. Procurement classified as PCC2 or PCC3 may not be counted as excess procurement.
   2. Excess procurement may be applied towards any future compliance period, including compliance years following 2020.
   3. Excess procurement shall be calculated as follows:
      - Compliance Period 1
        o EPx= Electricity products retired and applied toward the RPS procurement target for the compliance period X
        o RPSx= The RPS procurement target calculated in section C for compliance period X
        o S3x = Retired PCC 3 RECs in excess of the maximum allowed per section E
        o STCx= All electricity products that meet the criteria of section E, are associated with contracts less than 10 years in duration, and are retired and applied toward the RPS procurement target for compliance period X
      - Compliance Period 2
      - Compliance Period 3
      - Compliance Period 4
        o S2x = Retired PCC 2 RECs in excess of the maximum allowed per section E
      - Compliance Period 5
        o Excess Procurement = (EP2025-2027) — (RPS2025-2027 + S32025-2027 + S22025-2027)
      - Compliance Period 6
b. Waiver of Timely Compliance: Enforcement of timely compliance shall be waived if TID demonstrates that any of the following conditions are beyond the control of TID and will prevent timely compliance:

i. **Inadequate Transmission:** There is inadequate transmission capacity to allow sufficient electricity to be delivered from the TID Renewable Portfolio. Consideration of:
   1. Whether TID has undertaken, in a timely fashion, reasonable measures under its control and consistent with obligations under local, state, and federal laws and regulations, to develop and construct new transmission lines or upgrades to existing lines intended to transmit electricity generated by the TID Renewable Portfolio.
   2. Whether TID has taken all reasonable operational measures to maximize cost-effective deliveries of electricity from eligible renewable energy resources in advance of transmission availability.

ii. **Permitting, interconnection, or other delays,** that delay eligible renewable resource projects, or there is an insufficient supply of eligible renewable energy resources available to TID. Consideration should be given whether TID has:
   1. Prudently managed portfolio risks;
   2. Sought to develop its own renewable resources, transmission to connect to renewable resources, or energy storage used to integrate renewable energy resources.
   3. Procured an appropriate minimum margin of procurement above the minimum procurement level.
   4. Taken reasonable measures to procure cost effective distributed generation and allowable renewable energy credits.

iii. Unanticipated curtailment of renewable energy resources necessary to address the needs of a balancing authority.

iv. Other actions beyond the control of TID which impact timely deliveries of eligible renewable energy resources.

c. Cost Limitations- TID is committed to make every reasonable effort at complying with the requirements of the 33% RPS by 2020 and 60% by 2030, but will not do so "at any cost", or unreasonable or imprudent expense to TID's ratepayer owners. As such, the TID Board of Directors has authority to invoke a "not to exceed" cost limitation on TID's RPS expenditures. In considering these cost limitations, the Board shall ensure that the cost limitation measures are consistent with PUC §399.15(c), §399.30(d)(3), and the CEC RPS Regulations (3206 (a)(3), and ensure the following:

i. The level prevents disproportionate impacts.

ii. The costs of all procurement credited toward achieving the RPS are counted toward the limitation.

iii. Procurement expenditures do not include:
   1. Imbalance energy charges
   2. Sale of excess energy
   3. Decreased generation from existing sources
4. Transmission upgrades
5. Costs of relicensing any POU-owned hydroelectric facilities
   iv. That the expected cost of building, owning, and operating eligible renewable energy
       sources be considered.
   iv. That a plan of action to implement in the event the cost limitations are invoked be considered.

d. Prior Deficits: In no event shall a deficit from a prior compliance periods be added to future compliance periods

e. Portfolio Balance Requirement Reduction: TID may reduce the portfolio balance requirement for PCC1 for a specific Compliance Period, consistent with PUC §399.16(c) and the following:
   i. The need to reduce the portfolio balance requirements for PCC1 must have resulted because of circumstances beyond TID's control.
   ii. TID may not reduce its portfolio balance requirements for PCC1 below sixty-five percent (65%).
   iii. Should TID reduce its portfolio balance requirements for PCC1, it must:
       1. Adopt the changes at a publicly noticed meeting with at least 10 calendar days advance notice to the CEC including:
          a. The compliance period for which the reduction may be adopted.
          b. The level to which a POU has reduced the requirement.
          c. The reason or reasons the POU has proposed for adopting the reduction.
          d. An explanation of how the needed reduction resulted from conditions beyond TID's control as provided in Section H (b).
       2. Send the CEC a revised Renewable Resources Procurement Plan.

f. Historical Carryover: TID, as an early adopter in renewable energy received 421,529 allowances as Historic Carryover that have been applied to Compliance Period 2 procurement obligation. This is over and above the requirements delineated in Section 3206 (a) (5) for use in Compliance Period 2.

J. Reporting
a. Deliberations on Procurement Plan (399.30(f)):
   i. Public Notice: TID shall post notice as required by the Public Utilities Code (30 days in advance) if the TID Board will deliberate on this Procurement Plan. Notice to the California Energy Commission ("CEC"): Contemporaneous with the posting of a notice for deliberations, TID shall notify the CEC of the date, time, and location of the meeting so that the CEC can post publicly on the CEC website.

   ii. Documents and Materials Related to the TID Procurement Plan: TID shall make available publicly, via electronic copy, all information and documents related to the TID Procurement Plan to the CEC. In addition, TID will make this information available to the public.

b. Compliance Reporting
   i. TID shall submit the required reports to the CEC per Section 3207 of the California Code of Regulations, Title 20, Division 2, Chapter 13 (Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities).