



TURLOCK IRRIGATION DISTRICT
PROGRAM FOR ENFORCEMENT OF THE
RENEWABLE PORTFOLIO STANDARD POLICY

Adopted December 6, 2011

Amended and Adopted August 12, 2025

PURPOSE

The purpose of this Enforcement Program, established in compliance with California Public Utilities Code (PUC) § 399.30, is to create a program to review TID's annual compliance with the mandates of Senate Bill 100, regarding California's Renewable Portfolio Standard (RPS).

In conformance with PUC § 399.30, TID shall replace its RPS Policy for the Board of Directors (Board) with the TID Renewable Resources Procurement Plan. The TID Renewable Resources Procurement Plan, at minimum, will:

- Require TID to procure a minimum quantity of electricity products from eligible renewable energy resources as a specified percentage of total kilowatt hours sold to the utility's retail end-use customers, each compliance period to achieve the targets of subdivision § 399.30 (c)(1) and (2);
 - During Compliance Period 1, January 1, 2011 to December 31, 2013, TID shall procure renewable energy resources equivalent to an average of twenty percent (20%) of retail sales.
 - By the end of Compliance Period 2, December 31, 2016, TID shall procure renewable energy resources equivalent to twenty-five percent (25%) of retail sales.
 - By the end of Compliance Period 3, December 31, 2020, TID shall procure renewable energy resources equivalent to thirty-three percent (33%) of retail sales.

- By the end of Compliance Period 4, December 31, 2024, TID shall procure renewable energy resources equivalent to forty-four percent (44%) of retail sales.
 - By the end of Compliance Period 5, December 31, 2027, TID shall procure renewable energy resources equivalent to fifty-two percent (52%) of retail sales.
 - By the end of Compliance Period 6, December 31, 2030, TID shall procure renewable energy resources equivalent to sixty percent (60%) of retail sales.
 - Ensure reasonable progress in each of the intervening years of each compliance period.
- Include requirements consistent with PUC section 399.16(b) regarding the appropriate portfolio content categories for RPS procurement.
- Include provisions regarding the treatment of contract or ownership agreements originally executed prior to June 1, 2010 for renewable energy resources (§ 399.16(d))
- Include a measure to apply excess procurement from one compliance period to subsequent compliance periods, pursuant to § 399.30(d)(1), and in the same manner as §399.13(a)(4)(B).
- Include a measure to waive timely compliance pursuant to § 399.30(d)(2)(A) and consistent with § 399.15(b)(5)).
- Include a measure to establish a cost limitation for all eligible renewable energy resources used to comply with the renewables portfolio standard pursuant to § 399.30(d)(2)(B) and consistent with § 399.15(c).
- Include a measure that in all matters regarding compliance with the TID Renewable Resources Procurement Plan, 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).
- Include a provision to post annually public notice whenever the TID Board will deliberate in public on the Renewable Resources Procurement Plan pursuant to § 399.30(f).

- Include a provision regarding an annual report to California Energy Commission (CEC) regarding RPS contracts execution pursuant to § 399.30(g);
- Include a provisions regarding an annual report to the CEC and TID customers pursuant to § 399.30(1).

ENFORCEMENT PROGRAM

1. Enforcement Program: TID shall have a program for the enforcement of the TID Renewable Resources Procurement Plan, which shall include all of the provisions set forth herein and shall be known as TID's "RPS Enforcement Program";
2. Effective Date: The RPS Enforcement Program was first made effective January 1, 2012 and shall be updated from time to time at the discretion of the TID Board;
3. Notice of Revisions: Not less than ten (10) days' advance notice shall be given to the public before any meeting is held to make a substantive change to the RPS Enforcement Program;
4. Annual Review: Annually, TID's General Manager shall cause to be reviewed, TID's Renewable Resources Procurement Plan to determine TID's compliance;
5. Elements of the Annual Review: Annual review of the TID Renewable Resources Procurement Plan shall include consideration of each of the following elements:
 - A. By the end of each year and each Compliance Period:
 - Verify for the TID Board that TID has met the goals set forth in the Renewable Resources Procurement Plan for the appropriate annual and Compliance Period with eligible renewable resources from the specified Content Categories for the applicable period.
 - If targets are not met, TID must:
 - Review the applicability of applying Excess Procurement from a previous Compliance Period consistent with the provisions of the TID Renewable Resources Procurement Plan,
 - Ensure that any Waiver of Timely Compliance was compliant with the provisions in the TID Renewable Resources Procurement Plan,
 - Review applicability and appropriateness of excusing performance based on the Cost Limitations on Expenditures provisions of the RPS Policy.
6. Portfolio Balance Requirement Reduction
 - Verify for the TID Board that any reduction in Portfolio Balance requirement is consistent with the TID Renewable Resources Procurement Plan and PUC §399.16(e).
7. Procedures Upon Approving Waiver: In the event of a Waiver of Timely Compliance due to any of the factors above, TID shall implement the following procedures:
 - Establish additional reporting to the TID Board for intervening years to show demonstration of reasonable actions under TID control are being taken.

- Require a demonstration to the TID Board that all reasonable actions within TID's control have been taken to ensure compliance in order to grant the waiver.
8. Non Compliance: If it is determined that the TID has failed to comply with the provisions of the TID Renewable Resources Procurement Plan, the TID Board shall take steps to correct any untimely compliance, including:
- a. Direct staff to confirm compliance with the adopted cost limitation, if applicable;
 - b. Direct staff to develop and present to the Board a plan to bring the District into compliance;
 - c. Direct staff to review TID' s RPS Policy to determine what changes, if any, are necessary to ensure compliance in the next Compliance Period;
 - d. Direct staff to report quarterly to the Board regarding the progress being made toward meeting the compliance obligation;
 - e. Direct staff to report to the Board regarding the status of meeting subsequent compliance targets, and all steps being taken to ensure that the obligation is timely met.