

# VALLEY CLEAN ENERGY ALLIANCE

## Staff Report – Item 12

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TO: Board of Directors

FROM: Gordon Samuel, Assistant General Manager and Director of Power Services

SUBJECT: Accept and attest to the veracity of VCE’s Power Content Label for the Standard Green and Ultra Green products for 2019

DATE: November 12, 2020

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### RECOMMENDATION

Attest to the veracity of the information presented in Valley Clean Energy’s 2019 Power Source Disclosure Annual Reports and Power Content Label for the Standard Green and Ultra Green products.

### BACKGROUND

California Public Utilities Code requires all retail sellers of electric energy, including Valley Clean Energy (VCE), to disclose “accurate, reliable, and simple-to-understand information on the sources of energy” that are delivered to their respective customers.<sup>1</sup> Applicable regulations direct retail sellers to provide such communications no later than October 1<sup>st</sup> of each year. Due to a delay in the release of the Power Content Label template, the California Energy Commission (CEC) has extended this year’s deadline from October 1, 2020 to December 31, 2020. The format for requisite communications is highly prescriptive, offering little flexibility to retail sellers when presenting such information to customers. This format has been termed the “Power Content Label” by the CEC.

Information presented in the Power Content Label includes the appropriate share of total energy supply based on resource type, including both renewable and conventional fuel sources. In the event that a retail seller meets a certain percentage of its supply obligation from unspecified resources, the report must identify such purchases as “unspecified sources of power.” Unspecified sources of power refers to electricity that cannot be sourced back to a specific generator, such as energy purchased through open market transactions.

During the 2019 calendar year, VCE delivered a substantial portion of its electric energy supply from various renewable energy sources, including eligible hydroelectric, solar, and wind. For VCE Standard Green customers, 45.3% of the energy delivered was from renewable energy resources. For Ultra Green customers, 100% of the energy delivered was generated from

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<sup>1</sup> California Public Utilities Code Section 398.1(b).

renewable energy resources. A copy of VCE's Power Content Label listing the energy resources used during 2019 is attached.

Consistent with applicable regulations and CEC guidance, VCE will complete required customer communications in accordance with the December 31, 2020 deadline. All customers currently enrolled in the VCE program will receive the Power Content Label via mail.

To fulfill its Power Content Label reporting obligation, VCE may provide the CEC with the Board's attestation regarding the veracity of the information presented in VCE's 2019 Power Source Disclosure Annual Reports and Power Content Label for the Standard Green and Ultra Green products. Staff recommends VCE self-certify both the Standard Green and Ultra Green products in lieu of submitting them to a third-party Certified Public Accountant for a formal audit. VCE's technical consultants (SMUD) prepared the Power Source Disclosure annual reports and Power Content Label, which were subsequently reviewed by another VCE consultant (EQ Research). EQ Research's review, as detailed in the attached report, verified that the information contained in the annual reports and Power Content Label is accurate.

Based on the foregoing, staff requests that the Board accept this determination and attest to the veracity of the information included in VCE's Power Source Disclosure annual reports and Power Content Label for the Standard Green and Ultra Green products for the 2019 calendar year.

#### **ATTACHMENTS**

1. 2019 Annual Power Source Disclosure Report for the Standard Green Product
2. 2019 Annual Power Source Disclosure Report for the Ultra Green Product
3. 2019 Power Content Label
4. EQ Research Report re 2019 Power Source Disclosure Annual Reports and Power Content Label



**ANNUAL REPORT TO THE CALIFORNIA ENERGY COMMISSION: Power Source Disclosure**  
**For the Year Ending December 31, 2019**

Retail suppliers are required to use the posted template and are not allowed to make edits to this format. Please complete all requested information.

## GENERAL INSTRUCTIONS

<b>RETAIL SUPPLIER NAME</b>
Valley Clean Energy Alliance

<b>ELECTRICITY PORTFOLIO NAME</b>
Standard Green

### CONTACT INFORMATION

<b>Name</b>	Gordon Samuel
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<b>Title</b>	Assistant General Manager & Director of Power Services
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<b>Mailing Address</b>	604 2nd Street
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<b>City, State, Zip</b>	Davis, CA 95616
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<b>Phone</b>	1-855-699-8232
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<b>E-mail</b>	<a href="mailto:info@valleycleanenergy.org">info@valleycleanenergy.org</a>
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<b>Website URL for PCL Posting</b>	<a href="https://valleycleanenergy.org/power-sources/">https://valleycleanenergy.org/power-sources/</a>
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Submit the Annual Report and signed Attestation in PDF format with the Excel version of the Annual Report to PSDprogram@energy.ca.gov. Remember to complete the Retail Supplier Name, Electricity Portfolio Name, and contact information above, and submit separate reports and attestations for each additional portfolio if multiple were offered in the previous year.

**NOTE:** Information submitted in this report is not automatically held confidential. If your company wishes the information submitted to be considered confidential an authorized representative must submit an application for confidential designation (CEC-13), which can be found on the California Energy Commissions's website at <https://www.energy.ca.gov/about/divisions-and-offices/chief-counsels-office>.

If you have questions, contact Power Source Disclosure (PSD) staff at PSDprogram@energy.ca.gov or (916) 654-3954.



## INTRODUCTION

Retail suppliers are required to submit separate Annual Reports for each electricity portfolio offered to California retail consumers in the previous calendar year. Enter the Retail Supplier Name and Electricity Portfolio Name at the top of Schedule 1, Schedule 2, Schedule 3, and the Attestation.

A complete Annual Report includes the following tabs:

PSD Intro
Instructions
Schedule 1 - Procurements and Retail Sales
Schedule 2 - Retired Unbundled Renewable Energy Credits (RECs)
Schedule 3 - Annual Power Content Label Data
Asset-Controlling Supplier (ACS) Procurement Calculator
PSD Attestation

## INSTRUCTIONS

### Schedule 1: Procurements and Retail Sales

Retail suppliers of electricity must complete this schedule by entering information about all power procurements and generation that served the identified electricity portfolio covered in this filing in the prior year. The schedule is divided into sections: directly delivered renewables, firm-and-shaped imports, specified non-renewables, and procurements from ACSs. Insert additional rows as needed to report all procurements or generation serving the subject product. Provide the annual retail sales for the subject product in the appropriate space. At the bottom of Schedule 1, provide the retail suppliers' other electricity end-uses that are not retail sales, such as transmission and distribution losses.

**Any retail supplier that offered multiple electricity portfolios in the prior year must submit separate Annual Reports for each portfolio offered.**

**Specified Purchases:** A Specified Purchase refers to a transaction in which electricity is traceable to specific generating facilities by any auditable contract trail or equivalent, such as a tradable commodity system, that provides commercial verification that the electricity claimed has been sold once and only once to retail consumers. For specified purchases, include the following information for each line item:

**Facility Name** - Provide the name used to identify the facility.

**Fuel Type** - Provide the resource type (solar, natural gas, etc.) that this facility uses to generate electricity.

**Location** - Provide the state or province in which the facility is located.

**Identification Numbers** - Provide all applicable identification numbers from the Western Renewable Energy Generation Information System (WREGIS), the Energy Information Agency (EIA), and the California Renewables Portfolio Standard (RPS).

**Gross Megawatt Hours Procured** - Provide the quantity of electricity procured in MWh from the generating facility.

**Megawatt Hours Resold** - Provide the quantity of electricity resold at wholesale.

**Net Megawatt Hours Procured** - The Schedule automatically calculates the quantity of electricity procured minus resold electricity.

**Unspecified Power:** Unspecified Power refers to electricity that is not traceable to specific generation sources by any auditable contract trail or equivalent, or to power purchases from a transaction that expressly transferred energy only and not the RECs associated from a facility. Do not enter procurements of unspecified power. The schedule will calculate unspecified power procurements automatically.

### Schedule 2: Retired Unbundled RECs

Complete this schedule by entering information about unbundled REC retirements in the previous calendar year.

Unbundled RECs will be automatically displayed on Schedule 3 as a percentage of retail sales.

### Schedule 3: Annual Power Content Label Data

This schedule is provided as an automated worksheet that uses the information from Schedule 1 to calculate the power content, or resource mix, for each electricity portfolio. The percentages calculated on this worksheet should be used for your Power Content Label.



## **ACS Resource Mix Calculator**

Retail suppliers may report specified purchases from ACS system power if the ACS provided its fuel mix of its specified system mix to the Energy Commission. Use the calculator to determine the resource-specific procurement quantities, and transfer them to Schedule 1.

## **Attestation**

This template provides the attestation that must be submitted with the Annual Report to the Energy Commission, stating that the information contained in the applicable schedules is correct and that the power has been sold once and only once to retail consumers. This attestation must be included in the package that is transmitted to the Energy Commission. Please provide the complete Annual Report in Excel format and the complete Annual Report with signed attestation in PDF format as well.



**ANNUAL REPORT TO THE CALIFORNIA ENERGY COMMISSION: Power Source Disclosure**  
**SCHEDULE 1: PROCUREMENTS AND RETAIL SALES**  
**For the Year Ending December 31, 2019**  
**Valley Clean Energy Alliance**  
**Standard Green**

Instructions: Enter information about power procurements underlying this electricity portfolio for which your company is filing the Annual Report. Insert additional rows as needed. All fields in white should be filled out. Fields in grey auto-populate as needed and should not be filled out. For firm-and-shaped imports, provide the EIA ID of the substitute power, not the generator ID of the RECs. For EIA IDs for unspecified power or specified system mixes from asset-controlling suppliers, enter "unspecified", "BPA," "Powerex,", or "Tacoma" as applicable. For specified procurements of ACS power, use the ACS Procurement Calculator to calculate the resource breakdown comprising the ACS system mix. Procurements of unspecified power must not be entered as line items below; unspecified power will be calculated automatically in cell L9. Unbundled RECs must not be entered on Schedule 1 ; these products must be entered on Schedule 2. At the bottom portion of the schedule, provide the other electricity end-uses that are not retail sales including, but not limited to transmission and distribution losses or municipal street lighting. Amounts should be in megawatt-hours.

Retail Sales (MWh)	<b>641,646</b>
Net Specified Procurement (MWh)	491,514
Unspecified Power (MWh)	150,132
Procurement to be adjusted	-
Net Natural Gas	-
Net Coal & Other Fossil Fuels	-
Net Nuclear, Large Hydro & Renewables	491,514

**DIRECTLY DELIVERED RENEWABLES**

Facility Name	Fuel Type	State or Province	WREGIS ID	RPS ID	N/A	EIA ID	Gross MWh		Adjusted Net MWh		N/A
							Procured	MWh Resold	Procured	Procured	
Indian Valley Hydro - Indian Valley Hydro	Eligible hydro	CA	W607	60161A		50129	7,944		7,944	7,944	
American Falls Solar II, LLC - American Falls Solar	Solar	ID	W5375	63451A		60012	1,709		1,709	1,709	
American Falls Solar, LLC - American Falls Solar	Solar	ID	W5376	63450A		60011	789		789	789	
Campbell Hill - Campbell Hill	Wind	WY	W1383	61017A		57090	12,389		12,389	12,389	
Elkhorn Valley Wind Farm - Elkhorn Valley Wind Farm	Wind	OR	W186	61034A		56623	14,496		14,496	14,496	
Grand View 2 West - Grand View 2 West	Solar	ID	W5070	61595A		60068	18,393		18,393	18,393	
Grand View 5 East - Grand View 5 East	Solar	ID	W5069	61595A		60068	6,359		6,359	6,359	
ID Solar 1 - ID Solar 1, LLC	Solar	ID	W5076	63560A		60445	16,492		16,492	16,492	
Murphy Flat - Murphy Flat Power, LLC	Solar	ID	W5395	63449A		60009	1,044		1,044	1,044	
Neal Hot Springs Unit #1 - Neal Hot Springs Geothermal	Geothermal	OR	W3155	62427A		58022	4,044		4,044	4,044	
Orchard Ranch Solar, LLC - Orchard Ranch Solar	Solar	ID	W5373	63448A		60010	1,265		1,265	1,265	
Seven Mile Hill II - Seven Mile Hill II	Wind	WY	W976	60808A		56843	273		273	273	
Simcoe Solar, LLC - Simcoe Solar, LLC	Solar	ID	W5372	63447A		60748	1,314		1,314	1,314	
Spring Canyon - Spring Canyon	Wind	CO	W896	60775A		56320	1,161		1,161	1,161	
Top of the World - Top of the World	Wind	WY	W1749	61199A		57327	21,288		21,288	21,288	
North Sky River - North Sky River - Phase I	Wind	CA	W3206	61385A		58154	31,652		31,652	31,652	
Topaz Solar Farms LLC - Topaz 10-16	Solar	CA	W3226	61698A		57695	27,519		27,519	27,519	
Biglow Canyon Wind Farm - Biglow Canyon 3	Wind	OR	W1588	63056A		56485	4,327		4,327	4,327	
Biglow Canyon Wind Farm - Biglow Phase 2	Wind	OR	W1268	63055A		56485	998		998	998	
Centinela Solar Energy - CSE - Block 1F	Solar	CA	W3961	60837A		58430	8,541		8,541	8,541	
Centinela Solar Energy - CSE - Block 1G	Solar	CA	W3964	60837A		58430	121		121	121	
Centinela Solar Energy - CSE - Block 1H	Solar	CA	W4011	60837A		58430	14,738		14,738	14,738	





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END USES OTHER THAN RETAIL SALES	MWh
Distribution losses	41,464





## ANNUAL REPORT TO THE CALIFORNIA ENERGY COMMISSION: Power Source Disclosure

### SCHEDULE 2: PRORCUREMENTS AND RETAIL SALES

For the Year Ending December 31, 2019

#### Valley Clean Energy Alliance Standard Green

INSTRUCTIONS: Enter information about retired unbundled RECs associated with this electricity portfolio. Insert additional rows as needed. All fields in white should be filled out. Fields in grey auto-populate as needed and should not be filled out.

RETIRED UNBUNDLED RECS											Total Unbundled RECs	-
Facility Name	Fuel Type	Location (State or Province)	RPS ID	N/A	N/A	Total Retired (in MWh)	N/A	N/A	N/A	N/A	N/A	



**ANNUAL REPORT TO THE CALIFORNIA ENERGY COMMISSION: Power Source  
 SCHEDULE 3: ANNUAL POWER CONTENT LABEL DATA  
 for the year ending December 31, 2019  
 Valley Clean Energy Alliance  
 Standard Green**

Instructions: No data input is needed on this schedule. Retail suppliers should use these auto-populated calculations to fill out their Power Content Labels.

	<b>Adjusted Net Procured (MWh)</b>	<b>Percent of Total Retail Sales</b>
<b>Renewable Procurements</b>	290,853	45.3%
Biomass & Biowaste	-	0.0%
Geothermal	4,044	0.6%
Eligible Hydroelectric	7,944	1.2%
Solar	133,548	20.8%
Wind	145,317	22.6%
Coal	-	0.0%
Large Hydroelectric	200,661	31.3%
Natural gas	-	0.0%
Nuclear	-	0.0%
Other	-	0.0%
Unspecified Power	150,132	23.4%
<b>Total</b>	<b>641,646</b>	<b>100.0%</b>

<b>Total Retail Sales (MWh)</b>	<b>641,646</b>
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<b>Percentage of Retail Sales Covered by Retired Unbundled RECs</b>	<b>0.0%</b>
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**ASSET CONTROLLING SUPPLIER RESOURCE MIX CALCULATOR**

Instructions: Enter total net specified procurement of ACS system resources into cell A8, A23, or A38. In Column E, the calculator will determine quantities of resource-specific net procurement for entry on Schedule 1.

<b>Powerex</b>				
Net MWH Procured	N/A	Resource Type	Resource Mix Factors	Resource-Specific Procurements from ACS
		Biomass & biowaste		-
		Geothermal		-
		Eligible hydroelectric		-
		Solar		-
		Wind		-
		Coal		-
		Large hydroelectric	0.915	-
		Natural gas	0.013	-
		Nuclear	0.006	-
		Other	0.032	-
		Unspecified Power	0.034	-

<b>Bonneville Power Administration</b>				
Net MWH Procured	N/A	Resource Type	Resource Mix Factors	Resource-Specific Procurements from ACS
		Biomass & biowaste		-
		Geothermal		-
		Eligible hydroelectric		-
		Solar		-
		Wind		-
		Coal		-
		Large hydroelectric	0.85	-
		Natural gas		-
		Nuclear	0.11	-
		Other		-
		Unspecified Power	0.04	-

<b>Tacoma Power</b>				
Net MWH Procured	N/A	Resource Type	Resource Mix Factors	Resource-Specific Procurements from ACS
		Biomass & biowaste		-
		Geothermal		-
		Eligible hydroelectric		-
		Solar		-
		Wind		-
		Coal		-
		Large hydroelectric	0.896	-
		Natural gas		-
		Nuclear	0.064	-
		Other		-
		Unspecified Power	0.04	-



**ANNUAL REPORT TO THE CALIFORNIA ENERGY COMMISSION: Power Source Disclosure  
ATTESTATION FORM  
for the year ending December 31, 2019  
Valley Clean Energy Alliance  
Standard Green**

I, Gordon Samuel, Assistant General Manager & Director of Power Services, declare under penalty of perjury, that the statements contained in this report including Schedules 1, 2, and 3 are true and correct and that I, as an authorized agent of Valley Clean Energy Alliance, have authority to submit this report on the company's behalf. I further declare that the megawatt-hours claimed as specified purchases as shown in these Schedules were, to the best of my knowledge, sold once and only once to retail customers.

Name: Gordon Samuel

Representing (Retail Supplier): Valley Clean Energy Alliance

Signature: \_\_\_\_\_

Dated: July 16, 2020

Executed at: Davis, California



**ANNUAL REPORT TO THE CALIFORNIA ENERGY COMMISSION: Power Source Disclosure**  
**For the Year Ending December 31, 2019**

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## GENERAL INSTRUCTIONS

<b>RETAIL SUPPLIER NAME</b>
Valley Clean Energy Alliance

<b>ELECTRICITY PORTFOLIO NAME</b>
UltraGreen

### CONTACT INFORMATION

<b>Name</b>	Gordon Samuel
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<b>Title</b>	Assistant General Manager & Director of Power Services
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<b>Mailing Address</b>	604 2nd Street
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<b>City, State, Zip</b>	Davis, CA 95616
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<b>Phone</b>	1-855-699-8232
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<b>E-mail</b>	<a href="mailto:info@valleycleanenergy.org">info@valleycleanenergy.org</a>
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<b>Website URL for PCL Posting</b>	<a href="https://valleycleanenergy.org/power-sources/">https://valleycleanenergy.org/power-sources/</a>
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If you have questions, contact Power Source Disclosure (PSD) staff at PSDprogram@energy.ca.gov or (916) 654-3954.



# INTRODUCTION

Retail suppliers are required to submit separate Annual Reports for each electricity portfolio offered to California retail consumers in the previous calendar year. Enter the Retail Supplier Name and Electricity Portfolio Name at the top of Schedule 1, Schedule 2, Schedule 3, and the Attestation.

A complete Annual Report includes the following tabs:

PSD Intro
Instructions
Schedule 1 - Procurements and Retail Sales
Schedule 2 - Retired Unbundled Renewable Energy Credits (RECs)
Schedule 3 - Annual Power Content Label Data
Asset-Controlling Supplier (ACS) Procurement Calculator
PSD Attestation

# INSTRUCTIONS

## Schedule 1: Procurements and Retail Sales

Retail suppliers of electricity must complete this schedule by entering information about all power procurements and generation that served the identified electricity portfolio covered in this filing in the prior year. The schedule is divided into sections: directly delivered renewables, firm-and-shaped imports, specified non-renewables, and procurements from ACSs. Insert additional rows as needed to report all procurements or generation serving the subject product. Provide the annual retail sales for the subject product in the appropriate space. At the bottom of Schedule 1, provide the retail suppliers' other electricity end-uses that are not retail sales, such as transmission and distribution losses.

**Any retail supplier that offered multiple electricity portfolios in the prior year must submit separate Annual Reports for each portfolio offered.**

**Specified Purchases:** A Specified Purchase refers to a transaction in which electricity is traceable to specific generating facilities by any auditable contract trail or equivalent, such as a tradable commodity system, that provides commercial verification that the electricity claimed has been sold once and only once to retail consumers. For specified purchases, include the following information for each line item:

**Facility Name** - Provide the name used to identify the facility.

**Fuel Type** - Provide the resource type (solar, natural gas, etc.) that this facility uses to generate electricity.

**Location** - Provide the state or province in which the facility is located.

**Identification Numbers** - Provide all applicable identification numbers from the Western Renewable Energy Generation Information System (WREGIS), the Energy Information Agency (EIA), and the California Renewables Portfolio Standard (RPS).

**Gross Megawatt Hours Procured** - Provide the quantity of electricity procured in MWh from the generating facility.

**Megawatt Hours Resold** - Provide the quantity of electricity resold at wholesale.

**Net Megawatt Hours Procured** - The Schedule automatically calculates the quantity of electricity procured minus resold electricity.

**Unspecified Power:** Unspecified Power refers to electricity that is not traceable to specific generation sources by any auditable contract trail or equivalent, or to power purchases from a transaction that expressly transferred energy only and not the RECs associated from a facility. Do not enter procurements of unspecified power. The schedule will calculate unspecified power procurements automatically.

## Schedule 2: Retired Unbundled RECs

Complete this schedule by entering information about unbundled REC retirements in the previous calendar year. Unbundled RECs will be automatically displayed on Schedule 3 as a percentage of retail sales.

## Schedule 3: Annual Power Content Label Data

This schedule is provided as an automated worksheet that uses the information from Schedule 1 to calculate the power content, or resource mix, for each electricity portfolio. The percentages calculated on this worksheet should be used for your Power Content Label.



## **ACS Resource Mix Calculator**

Retail suppliers may report specified purchases from ACS system power if the ACS provided its fuel mix of its specified system mix to the Energy Commission. Use the calculator to determine the resource-specific procurement quantities, and transfer them to Schedule 1.

## **Attestation**

This template provides the attestation that must be submitted with the Annual Report to the Energy Commission, stating that the information contained in the applicable schedules is correct and that the power has been sold once and only once to retail consumers. This attestation must be included in the package that is transmitted to the Energy Commission. Please provide the complete Annual Report in Excel format and the complete Annual Report with signed attestation in PDF format as well.





**ANNUAL REPORT TO THE CALIFORNIA ENERGY COMMISSION: Power Source Disclosure**  
**SCHEDULE 1: PROCUREMENTS AND RETAIL SALES**  
**For the Year Ending December 31, 2019**  
**Valley Clean Energy Alliance**  
**UltraGreen**

Instructions: Enter information about power procurements underlying this electricity portfolio for which your company is filing the Annual Report. Insert additional rows as needed. All fields in white should be filled out. Fields in grey auto-populate as needed and should not be filled out. For firm-ed-and-shaped imports, provide the EIA ID of the substitute power, not the generator ID of the RECs. For EIA IDs for unspecified power or specified system mixes from asset-controlling suppliers, enter "unspecified", "BPA," "Powerex,", or "Tacoma" as applicable. For specified procurements of ACS power, use the ACS Procurement Calculator to calculate the resource breakdown comprising the ACS system mix. Procurements of unspecified power must not be entered as line items below; unspecified power will be calculated automatically in cell L9. Unbundled RECs must not be entered on Schedule 1 ; these products must be entered on Schedule 2. At the bottom portion of the schedule, provide the other electricity end-uses that are not retail sales including, but not limited to transmission and distribution losses or municipal street lighting. Amounts should be in megawatt-hours.

Retail Sales (MWh)	<b>1,006</b>
Net Specified Procurement (MWh)	1,006
Unspecified Power (MWh)	-
Procurement to be adjusted	-
Net Natural Gas	-
Net Coal & Other Fossil Fuels	-
Net Nuclear, Large Hydro & Renewables	1,006

**DIRECTLY DELIVERED RENEWABLES**

Facility Name	Fuel Type	State or Province	WREGIS ID	RPS ID	N/A	EIA ID	Gross MWh		Adjusted Net MWh		N/A
							Procured	MWh Resold	Procured	Procured	
North Sky River - North Sky River - Phase I	Wind	CA	W3206	61385A		58154	329		329	329	
Centinel Solar Energy - CSE - Block 1F	Solar	CA	W3961	60837A		58430	171		171	171	
Centinel Solar Energy - CSE - Block 2B	Solar	CA	W4132	60837A		58430	165		165	165	
Indian Valley Hydro - Indian Valley Hydro	Eligible hydro	CA	W607	60161A		50129	341		341	341	
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**FIRMED-AND-SHAPED IMPORTS**







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END USES OTHER THAN RETAIL SALES	MWh
Distribution losses	70





**ANNUAL REPORT TO THE CALIFORNIA ENERGY COMMISSION: Power Source  
 SCHEDULE 3: ANNUAL POWER CONTENT LABEL DATA  
 for the year ending December 31, 2019  
 Valley Clean Energy Alliance  
 UltraGreen**

Instructions: No data input is needed on this schedule. Retail suppliers should use these auto-populated calculations to fill out their Power Content Labels.

	<b>Adjusted Net Procured (MWh)</b>	<b>Percent of Total Retail Sales</b>
<b>Renewable Procurements</b>	1,006	100.0%
Biomass & Biowaste	-	0.0%
Geothermal	-	0.0%
Eligible Hydroelectric	341	33.9%
Solar	336	33.4%
Wind	329	32.7%
Coal	-	0.0%
Large Hydroelectric	-	0.0%
Natural gas	-	0.0%
Nuclear	-	0.0%
Other	-	0.0%
Unspecified Power	-	0.0%
<b>Total</b>	<b>1,006</b>	<b>100.0%</b>

<b>Total Retail Sales (MWh)</b>	<b>1,006</b>
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<b>Percentage of Retail Sales Covered by Retired Unbundled RECs</b>	<b>0.0%</b>
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**ASSET CONTROLLING SUPPLIER RESOURCE MIX CALCULATOR**

Instructions: Enter total net specified procurement of ACS system resources into cell A8, A23, or A38. In Column E, the calculator will determine quantities of resource-specific net procurement for entry on Schedule 1.

<b>Powerex</b>				
Net MWH Procured	N/A	Resource Type	Resource Mix Factors	Resource-Specific Procurements from ACS
		Biomass & biowaste		-
		Geothermal		-
		Eligible hydroelectric		-
		Solar		-
		Wind		-
		Coal		-
		Large hydroelectric	0.915	-
		Natural gas	0.013	-
		Nuclear	0.006	-
		Other	0.032	-
		Unspecified Power	0.034	-

<b>Bonneville Power Administration</b>				
Net MWH Procured	N/A	Resource Type	Resource Mix Factors	Resource-Specific Procurements from ACS
		Biomass & biowaste		-
		Geothermal		-
		Eligible hydroelectric		-
		Solar		-
		Wind		-
		Coal		-
		Large hydroelectric	0.85	-
		Natural gas		-
		Nuclear	0.11	-
		Other		-
		Unspecified Power	0.04	-

<b>Tacoma Power</b>				
Net MWH Procured	N/A	Resource Type	Resource Mix Factors	Resource-Specific Procurements from ACS
		Biomass & biowaste		-
		Geothermal		-
		Eligible hydroelectric		-
		Solar		-
		Wind		-
		Coal		-
		Large hydroelectric	0.896	-
		Natural gas		-
		Nuclear	0.064	-
		Other		-
		Unspecified Power	0.04	-



**ANNUAL REPORT TO THE CALIFORNIA ENERGY COMMISSION: Power Source Disclosure  
ATTESTATION FORM  
for the year ending December 31, 2019  
Valley Clean Energy Alliance  
UltraGreen**

I, Gordon Samuel, Assistant General Manager & Director of Power Services, declare under penalty of perjury, that the statements contained in this report including Schedules 1, 2, and 3 are true and correct and that I, as an authorized agent of Valley Clean Energy Alliance, have authority to submit this report on the company's behalf. I further declare that the megawatt-hours claimed as specified purchases as shown in these Schedules were, to the best of my knowledge, sold once and only once to retail customers.

Name: Gordon Samuel

Representing (Retail Supplier): Valley Clean Energy Alliance

Signature: \_\_\_\_\_

Dated: July 16, 2020

Executed at: Davis, California

<b>2019 POWER CONTENT LABEL</b>			
<b>Valley Clean Energy</b>			
<b><a href="https://valleycleanenergy.org/power-sources/">https://valleycleanenergy.org/power-sources/</a></b>			
<b>ENERGY RESOURCES</b>	<b>Standard Green</b>	<b>UltraGreen</b>	<b>2019 CA Power Mix</b>
<b>Eligible Renewable<sup>1</sup></b>	<b>45.3%</b>	<b>100.0%</b>	<b>31.7%</b>
Biomass & Biowaste	0.0%	0.0%	2.4%
Geothermal	0.6%	0.0%	4.8%
Eligible Hydroelectric	1.2%	33.9%	2.0%
Solar	20.8%	33.4%	12.3%
Wind	22.6%	32.7%	10.2%
<b>Coal</b>	<b>0.0%</b>	<b>0.0%</b>	<b>3.0%</b>
<b>Large Hydroelectric</b>	<b>31.3%</b>	<b>0.0%</b>	<b>14.6%</b>
<b>Natural Gas</b>	<b>0.0%</b>	<b>0.0%</b>	<b>34.2%</b>
<b>Nuclear</b>	<b>0.0%</b>	<b>0.0%</b>	<b>9.0%</b>
<b>Other</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.2%</b>
<b>Unspecified sources of power<sup>2</sup></b>	<b>23.4%</b>	<b>0.0%</b>	<b>7.3%</b>
<b>TOTAL</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
<b>Percentage of Retail Sales Covered by Retired Unbundled RECs<sup>3</sup></b>	<b>0.0%</b>		
<p><sup>1</sup>The eligible renewable percentage above does not reflect RPS compliance, which is determined using a different methodology.</p> <p><sup>2</sup>Unspecified power is electricity that has been purchased through open market transactions and is not traceable to a specific generation source.</p> <p><sup>3</sup>Renewable energy credits (RECs) are tracking instruments issued for renewable generation. Unbundled renewable energy credits (RECs) represent renewable generation that was not delivered to serve retail sales. Unbundled RECs are not reflected in the power mix or GHG emissions intensities above.</p>			
For specific information about this electricity product, contact:	<b>Valley Clean Energy</b> <b>1-855-699-8232</b>		
For general information about the Power Content Label, please visit:	<a href="http://www.energy.ca.gov/pcl/">http://www.energy.ca.gov/pcl/</a>		
For additional questions, please contact the California Energy Commission at:	Toll-free in California: 844-454-2906 Outside California: 916-653-0237		

# Valley Clean Energy Alliance

POWER SOURCE DISCLOSURE INDEPENDENT REVIEW OF  
STANDARD GREEN PRODUCT AND ULTRAGREEN PRODUCT  
FOR REPORTING YEAR 2019

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To: Gordon Samuel, Asst. General Manager & Director of Power Resources

From: Miriam Makhyou, CEO, EQ Research, LLC  
Blake Elder, Sr. Energy Policy Research Analyst, EQ Research, LLC

Date: October 27, 2020

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## Introduction

Valley Clean Energy Alliance (VCEA) has engaged EQ Research, LLC (EQ Research) to assist with an independent review of VCEA's Standard Green Power Source Disclosure (PSD) Annual Report and UltraGreen PSD Annual Report (together, the "Annual Reports") for the year ending December 31, 2019. We have performed the procedures enumerated below to assist VCEA with complying with the auditing and verification requirements of the PSD Program, as defined in Section 1394.2 of the California Code of Regulations, Title 20.

EQ Research obtained the underlying documentation<sup>1</sup> used by VCEA to complete the Annual Reports from VCEA and accepts the accuracy of the information provided by VCEA. EQ Research did not access VCEA's Western Renewable Energy Generation Information System (WREGIS) account information to verify the authenticity of the information provided by VCEA but was provided an export of information from WREGIS.<sup>2</sup>

## Review Procedures and Findings

EQ Research based its detailed review of the Annual Reports on the audit procedures detailed in Section 1394.2(b) of the PSD program regulations. The procedures and associated findings for the Annual Reports is detailed below.

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<sup>1</sup> All files referenced in this report can be accessed at: <https://eqresearch.sharefile.com/d-s9d43479fc1a4e28b>.

<sup>2</sup> See 2019 Standard Green RPS Retirement and 2019 UltraGreen RPS Retirement files in the Sharefile link.



## Standard Green PSD Report Review and UltraGreen PSD Report Review

### *(b) Audit Procedures (1)(A)*

EQ Research used the following primary publicly available sources in order to validate the information in the Annual Reports:

Source 1 (EIA): Energy Information Administration (EIA), Form EIA-923 detailed data, 2019 Zip File, EIA923\_Schedules\_2\_3\_4\_5\_M\_12\_2019\_Final.xlsx, Page 1 Generation and Fuel Data, accessed on September 21, 2020 from <https://www.eia.gov/electricity/data/eia923/>

Source 2 (CEC): California Energy Commission (CEC), California's Renewables Portfolio Standard (RPS) Public Search exported to Excel, accessed on October 18, 2020 from <https://rps.energy.ca.gov/Pages/Search/SearchApplications.aspx>

EQ Research agreed the specified purchases<sup>3</sup> by (a) facility name, (b) facility number provided by EIA, RPS ID, (c) kilowatt-hours, and (d) fuel type from the information used to prepare used to prepare the Annual Reports is consistent with what is presented in the Annual Reports Schedule 1<sup>4</sup> with three exceptions regarding the facility names in the Annual Reports as compared to the facility names from EIA and CEC:

For Standard Green, "Grand View 5 East" is "Grand View PV Solar Two" (EIA ID 60068 and RPS ID 61595).

For Standard Green, "CSolar IV South" is "Tenaska Imperial Solar Energy Center South" (EIA ID 57490 and RPS ID 61657).

The above two exceptions have been clarified by VCEA through screenshots of its WREGIS accounts. See Appendix A. Facility Name Differences Validated by WREGIS Account Screenshots.

On Row 62 of the Standard Green Annual Report the large hydro plant listed as "Kerr" (after Kerr Dam) has been officially known since 2015 as the Seli's Ksanka Qlispe' Dam. It is listed in the EIA 923 Data as "Selis Ksanka Qlispe" (EIA Plant ID 2188).

The final above exception is identified in Appendix B. Specified Facility Review Results.

EQ Research verified that the MWh listed in the Annual Reports do not exceed the annual MWhs from EIA 923 data as expected (see Appendix B. Specified Facility Review Results).

EQ Research also tested the mathematical accuracy of Schedule 1 and noted no exceptions.

### *(b) Audit Procedures (1)(B)(1)*

EQ Research agreed the facility name, facility numbers provided by EIA and RPS, kilowatt hours, and the fuel type from the invoice match the information used to prepare Schedule 1 of the Annual Reports.

EQ Research verified the above information by reviewing a sample of nine invoices of power purchases represented in the 2019 Annual Reports against the information used to prepare Schedule 1 of the Annual Reports and against the CEC and EIA data mentioned in (b) Audit Procedures (1)(A) above.

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<sup>3</sup> There were no resales.

<sup>4</sup> This information was checked against information in the following links: Source for RPS IDs: <https://rps.energy.ca.gov/Pages/Search/SearchApplications.aspx>; Source for EIA IDs: <https://www.eia.gov/electricity/data/eia923/>

See Appendix C. Sample of Purchases VCEA used to Prepare Schedule 1 which shows two limitations to EQ Research's review that have been clarified by VCEA as being limited only by the sample provided with no exceptions to note otherwise:

VCEA confirmed that outside of the sample of nine invoices reviewed by EQ Research, there are additional invoices that were not reviewed by EQ Research for the remaining 54,252 RECs from SDG&E amounting to 59,000 RECs.

VCEA confirmed that there is another invoice that was not reviewed by EQ Research for the remaining 6,073 RECs from the Indian Valley Hydro Project amounting to 8,285 RECs.

*(b) Audit Procedures (1)(B)(2)*

This is not applicable since there are no facilities in the Annual Reports owned by VCEA.

*(b) Audit Procedures (1)(B)(3)*

EQ Research verified a match between the date of generation from the nine invoices in the sample to the reporting period of the information used to prepare Schedule 1.

See the "Energy Delivery Term" column in Appendix C. Sample of Purchases VCEA used to Prepare Schedule 1.

*(b) Audit Procedures (1)(B)(4)*

This requirement is not applicable since VCEA did not use unbundled recs in its Annual Reports.

*(b) Audit Procedures (1)(C)*

The requirement that the auditor shall agree any excluded emissions meet the requirements pursuant to section 1393(d) is not applicable to 2019 deliveries for the 2020 reports but VCEA has taken notice of this requirement for 2020 deliveries for the 2021 reports.

*(b) Audit Procedures (2)*

EQ Research obtained a copy of the 2019 Power Content Label to be provided to VCE customers for the Standard Green and UltraGreen products. EQ Research verified that the resource portfolio percentages listed for each product on the 2019 Power Content Label match the respective percentages listed in Schedule 3 of the Annual Reports.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be and should not be used by anyone other than those specified parties.

# Appendix A. Facility Name Differences Validated by WREGIS Account Screenshots

RPS ID: 
 Suffix: 
 Facility Name: 
 Application Status: 
 Resource Type: 
 WREGIS GU ID:

**Search**

**Results**

Export To:

RPS ID	Suffix	Facility Name	Eligibility Date	Status	Primary Resource
61595	A	Grand View PV Solar Two	07/06/2011	Approved	Photovoltaic

RPS ID: 
 Suffix: 
 Facility Name: 
 Application Status: 
 Resource Type: 
 WREGIS GU ID:

**Search**

**Results**

Export To:

RPS ID	Suffix	Facility Name	Eligibility Date	Status	Primary Resource
61657	A	Tenaska Imperial Solar Energy Center South	08/08/2011	Approved	Photovoltaic

# Appendix B. Specified Facility Review Results

Renewable?	Ultragreen?	Standard Green?	EIA ID	RPS ID	Facility Name Vlookup using EIA ID	Facility Name VLOOKUP using RPS ID	Facility Name from VCEA Annual Reports	MWh Generation Vlookup using EIA ID	MWh Generation Annual EIA - Adjusted Net MWh Procured by VCEA in 2019	Adjusted Net MWh Procured in 2019 by VCEA	EIA MWh - VCEA Reported MWh	% EIA MWh to VCEA Reported MWh	Technology VLOOKUP using RPS ID	Fuel Type VCEA
1	1	1	58154	61385A	North Sky River Energy LLC	North Sky River	North Sky River - North Sky River - Phase I	425,137	424,808	329	(329)	-0.08%	Wind	Wind
1	1	1	58430	60837A	Centinela Solar Energy	Centinela Solar Energy	Centinela Solar Energy - CSE - Block 1F	483,717	483,546	171	(171)	-0.04%	Photovoltaic	Solar
1	1	1	58430	60837A	Centinela Solar Energy	Centinela Solar Energy	Centinela Solar Energy - CSE - Block 2B	483,717	483,552	165	(165)	-0.03%	Photovoltaic	Solar
1	1	1	50129	60161A	Indian Valley Dam Hydro Project	Indian Vly Hydro Elec Ptm.	Indian Valley Hydro - Indian Valley Hydro	8,285	7,944	341	(341)	-4.23%	Small Hydroelectric	Eligible hydro
1	1	1	58154	61385A	North Sky River Energy LLC	North Sky River	North Sky River - North Sky River - Phase I	425,137	393,485	31,652	(31,652)	-8.04%	Wind	Wind
1	1	1	58430	60837A	Centinela Solar Energy	Centinela Solar Energy	Centinela Solar Energy - CSE - Block 1F	483,717	475,176	8,541	(8,541)	-1.80%	Photovoltaic	Solar
1	1	1	58430	60837A	Centinela Solar Energy	Centinela Solar Energy	Centinela Solar Energy - CSE - Block 2B	483,717	479,109	4,608	(4,608)	-0.96%	Photovoltaic	Solar
1	1	1	50129	60161A	Indian Valley Dam Hydro Project	Indian Vly Hydro Elec Ptm.	Indian Valley Hydro - Indian Valley Hydro	8,285	341	7,944	(7,944)	-2329.62%	Small Hydroelectric	Eligible hydro
1	1	1	60012	63451A	American Falls Solar II	American Falls Solar II, LLC	American Falls Solar II, LLC - American Falls Solar II, LLC	44,078	42,369	1,709	(1,709)	-4.03%	Photovoltaic	Solar
1	1	1	60011	63450A	American Falls Solar II	American Falls Solar II, LLC	American Falls Solar II, LLC - American Falls Solar II, LLC	43,789	43,000	789	(789)	-1.83%	Photovoltaic	Solar
1	1	1	57090	61017A	Campbell Hill Windpower	Campbell Hill - Three Buttes	Campbell Hill - Campbell Hill	323,963	311,574	12,389	(12,389)	-3.84%	Wind	Wind
1	1	1	56623	61034A	Elkhorn Valley Wind Farm	Elkhorn Valley Wind Farm	Elkhorn Valley Wind Farm - Elkhorn Valley Wind Farm	305,671	291,175	14,496	(14,496)	-4.98%	Wind	Wind
1	1	1	60068	61595A	Grand View Solar Two	Grand View PV Solar Two	Grand View 2 West - Grand View 2 West	180,168	161,775	18,393	(18,393)	-11.37%	Photovoltaic	Solar
1	1	1	60068	61595A	Grand View Solar Two	Grand View PV Solar Two	Grand View 5 East - Grand View 5 East	180,168	173,809	6,359	(6,359)	-3.66%	Photovoltaic	Solar
1	1	1	60445	63560A	ID Solar	ID Solar 1, LLC	ID Solar 1 - ID Solar 1, LLC	94,128	77,636	16,492	(16,492)	-21.24%	Photovoltaic	Solar
1	1	1	60009	63449A	Murphy Flat Solar	Murphy Flat Power, LLC	Murphy Flat - Murphy Flat Power, LLC	46,442	45,398	1,044	(1,044)	-2.30%	Photovoltaic	Solar
1	1	1	58022	62427A	Neal Hot Springs Geothermal Project	Neal Hot Springs Unit 1	Neal Hot Springs Unit #1 - Neal Hot Springs Geothermal	185,456	181,412	4,044	(4,044)	-2.23%	Geothermal	Geothermal
1	1	1	60010	63448A	Orchard Ranch Solar	Orchard Ranch Solar, LLC	Orchard Ranch Solar, LLC - Orchard Ranch Solar, LLC	48,438	47,173	1,265	(1,265)	-2.68%	Photovoltaic	Solar
1	1	1	56843	60808A	Seven Mile Hill II	Seven Mile Hill II	Seven Mile Hill II - Seven Mile Hill II	385,943	385,670	273	(273)	-0.07%	Wind	Wind
1	1	1	60748	63447A	Simcoe Solar	Simcoe Solar, LLC	Simcoe Solar, LLC - Simcoe Solar, LLC	48,338	47,024	1,314	(1,314)	-2.79%	Photovoltaic	Solar
1	1	1	56320	60775A	Spring Canyon	Spring Canyon Energy	Spring Canyon - Spring Canyon	171,157	169,996	1,161	(1,161)	-0.68%	Wind	Wind
1	1	1	57327	61199A	Top of the World Windpower Project	Top of the World	Top of the World - Top of the World	548,878	527,590	21,288	(21,288)	-4.03%	Wind	Wind
1	1	1	57695	61698A	Topaz Solar Farm	Topaz Solar Farms LLC	Topaz Solar Farms LLC - Topaz 1D-1E	1,255,722	1,228,203	27,519	(27,519)	-2.24%	Photovoltaic	Solar
1	1	1	56485	63056A	Biglow Canyon Wind Farm	Biglow Canyon Wind Farm Phase 3	Biglow Canyon Wind Farm - Biglow Canyon 3	983,163	978,836	4,327	(4,327)	-0.44%	Wind	Wind
1	1	1	56485	63055A	Biglow Canyon Wind Farm	Biglow Canyon Wind Farm Phase 2	Biglow Canyon Wind Farm - Biglow Canyon 2	983,163	982,165	998	(998)	-0.10%	Wind	Wind
1	1	1	58430	60837A	Centinela Solar Energy	Centinela Solar Energy	Centinela Solar Energy - CSE - Block 1G	483,717	483,596	121	(121)	-0.03%	Photovoltaic	Solar
1	1	1	58430	60837A	Centinela Solar Energy	Centinela Solar Energy	Centinela Solar Energy - CSE - Block 1H	483,717	468,979	14,738	(14,738)	-3.14%	Photovoltaic	Solar
1	1	1	58430	60837A	Centinela Solar Energy	Centinela Solar Energy	Centinela Solar Energy - CSE - Block 2C	483,717	480,776	2,941	(2,941)	-0.61%	Photovoltaic	Solar
1	1	1	58430	60837A	Centinela Solar Energy	Centinela Solar Energy	Centinela Solar Energy - CSE - Block 2D	483,717	481,985	1,732	(1,732)	-0.36%	Photovoltaic	Solar
1	1	1	58430	60837A	Centinela Solar Energy	Centinela Solar Energy	Centinela Solar Energy - CSE - Blocks 1A, 1B, & 1C	483,717	476,550	7,167	(7,167)	-1.50%	Photovoltaic	Solar
1	1	1	58430	60837A	Centinela Solar Energy	Centinela Solar Energy	Centinela Solar Energy - CSE - Blocks 1D & 1E	483,717	467,175	16,542	(16,542)	-3.54%	Photovoltaic	Solar
1	1	1	57490	61657A	Imperial Solar Energy Center South	Tenaska Imperial Solar Energy Center South	CSolar IV South - ISEC South 1-3	281,501	279,227	2,274	(2,274)	-0.81%	Photovoltaic	Solar
1	1	1	61582	63686A	Voyager Wind II	Voyager Wind 2	Voyager Wind 2 - Voyager Wind 2	458,595	399,862	58,733	(58,733)	-14.69%	Wind	Wind
1	1	1	6433		Boundary	N/A	Boundary Hydroelectric Units	3,300,777	3,243,701	57,076	(57,076)	-1.76%	N/A	Large hydro
1	1	1	2188		Sells Kanka Qlisp	N/A	Kerr	836,964	824,789	12,175	(12,175)	-1.48%	N/A	Large hydro
1	1	1	3888		Wanapum	N/A	Mid-C Hydro - Wanapum (Grant County PUD)	4,252,008	4,241,686	10,322	(10,322)	-0.24%	N/A	Large hydro
1	1	1	3886		Wells	N/A	Mid-C Hydro - Wells (Douglas County PUD)	3,687,032	3,645,944	41,088	(41,088)	-1.13%	N/A	Large hydro
1	1	1	425		Middle Fork	N/A	Middle Fork Hydro	788,857	788,857	80,000	(80,000)	-11.29%	N/A	Large hydro

# Appendix C. Sample of Purchases VCEA used to Prepare Schedule 1

Contract	Total MWh on Invoice	Total from CPUC		Energy Delivery Term	Invoice or		Resource	Match Check	Match T/F	Remaining MWh	
		Contract Spreadsheet	VCEA MWh		PO#	PCC1/2					
0819 PGAE REC.pdf	159,500	59,500	59,500	04/01/2019 - 04/30/2019	146415		1 North Sky River and Topaz Solar Farms	59,500	TRUE	-	MATCHED
1119 SDGE.pdf	4,748	59,000	4,748	Nov-19	156215		1	4,748	FALSE	54,252	VCEA confirmed that there are additional invoices for the remaining 54,252 RECs from SDG&E amounting to 59,000 RECs.
1219 PGE29 VCEA.pdf	4,327	5,325	4,327	Aug-19	393715		2 Biglow Canyon Wind Farm	5,325	TRUE	-	MATCHED
012020 PGE29 VCEA.pdf	998		998	Sep-19	396010		2 Biglow Canyon Wind Farm				
1907 Indian Valley Hydro Project.pdf	2,212	8,285	2,212	Jul-19	4500110130		1 Indian Valley Hydro	2,212	FALSE	6,073	VCEA confirmed that there is another invoice for the remaining 6,073 RECs.
DTET_VALLEYCEA - BU_US\$ _136032.60 _2932191_3.pdf	18,540	101,016	18,540	3/25/19	2932191		2 Various	101,016	TRUE	-	MATCHED
DTET_VALLEYCEA - BU_US\$ _221914.75 _2843711_3.pdf	33,950		33,950	10/29/19	2843711		2 Various				
DTET_VALLEYCEA - BU_US\$ _304912.90 _2941879_3.pdf	48,526		48,526	4/13/2019-4/14/2019	2941879		2 Various				
SENA76.pdf	2,070	58,733	2,070	N/A 2019	2347991		1 Voyager Wind 2	58,733	TRUE	-	MATCHED
SENA76.pdf	1,004		1,004	N/A 2019	2348007		1 Voyager Wind 2				
SENA76.pdf	55,569		55,569	N/A 2019	2348009		1 Voyager Wind 2				
SENA76.pdf	90		90	N/A 2019	2350446		1 Voyager Wind 2				