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UNIVERSITY OF CALIFORNIA OFFICE OF THE PRESIDENT
ETHICS, COMPLIANCE AND AUDIT SERVICES
INTERNAL AUDIT

POWER SOURCE DISCLOSURE PROGRAM
Project No. P25A005
January 2025

Work Performed by:
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Introduction

Office of the President (UCOP) Internal Audit Services performed an audit of the University of California Power Source Disclosure Program. The Regents of the University of California is a registered Electric Service Provider (ESP) that provides electricity to many of the UC campuses and medical centers and is subject to reporting requirements.

Background

As an ESP, the University is subject to the regulations and reporting requirements of all ESPs – one of which is an annual reporting of power content to the California Energy Commission. The Power Content Label describes the sources of electricity that are directly delivered to the California power grid by the ESP on behalf of participating campuses.

The Power Source Disclosure reporting process consists of three steps – the first of which occurred June 27, 2024 when the Renewable Energy Analyst, Energy & Sustainability, UC Office of the President, submitted attestation forms, signed by the Clean Power Program Director, summarizing the electricity purchases and sales for the calendar year 2023. This audit fulfills the second requirement in which an independent certified public accountant or a certified internal auditor verifies that the 2023 Annual Report to the California Energy Commission (Schedules 1, 2 and 3) on power procurement and resale is accurate and complete. The third step consists of populating a Power Content Label template with the percentage values calculated in the Schedule 3 of the Annual Report and submitting it, along with the audit attestation to the California Energy Commission by January 31, 2025.¹

Objectives and Scope

The primary objectives of this audit project were to follow the audit procedures as listed in the Modifications of Regulations Governing the Power Source Disclosure Program, § 1394.2, Auditing and Verifications, and perform the following:

- Verify that power purchases and sales as listed on the 2023 Annual Report to the California Energy Commission: Power Source Disclosure Program (Schedules 1 and 2) agree with supporting documentation.
- Verify that the power mix percentages reported on the 2023 Power Content Label agreed to 2023 Schedule 3 information.
- Verify that 2023 Schedules 1, 2 and 3, and the 2023 Power Content Label are mathematically accurate.

Procedures Performed

¹ Normally the due date is October 1st, however due to software issues within the Western Renewable Energy Generation Information System, the California Energy Commission extended this year's due date to January 31, 2025.

To accomplish the project objectives and scope, the following procedures were performed:

1. Obtained and reviewed existing documentation, including Renewable Energy Credit contracts, certificates, and meter data reports used to prepare 2023 Schedules 1 and 2.
2. Agreed the purchases and sales by facility name, unique identification number, megawatt hours and fuel type to supporting documentation.
3. Agreed the power mix data on the 2023 Schedule 3 to the 2023 Power Content Label.
4. Tested the mathematical accuracy of the 2023 Schedules 1, 2 and 3, and the 2023 Power Content Label.

Conclusion

Based on our review of the supporting documentation, we conclude that Schedules 1, 2 and 3 of the Annual Report to the California Energy Commission: Power Source Disclosure Program, prepared by the University of California for the calendar year 2023, are complete and accurately reflect supporting documentation for power procurement (specific and unspecified purchases). We also conclude that the 2023 Power Content Label was accurate.

As required by the audit procedures, we have prepared and attached a separate memo to the California Energy Commission summarizing that the results of our review did not disclose any exceptions and that the audit was performed by a Certified Internal Auditor in good standing with the Institute of Internal Auditors.