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CRS Comments on Updates to the RPS Guidebook

Additional submitted attachment is included below.



October 20th, 2025

California Energy Commission (CEC)

Docket Unit, MS-4

Docket No. 21-RPS-02

715 P Street, Sacramento, California 95814

**RE: COMMENTS OF CENTER FOR RESOURCE SOLUTIONS (CRS) ON RENEWABLE
PORTFOLIO STANDARD (RPS) 10TH EDITION GUIDEBOOK UPDATE. DOCKET NO.
21-RPS-02**

Dear California Energy Commission Staff,

The Center for Resource Solutions appreciates the opportunity to submit comments in response to the Notice of Availability, Request for Comments, and Staff Workshop on the Draft Renewables Portfolio Standard 10th Edition Guidebook.

CRS supports the California Energy Commission's (CEC) efforts to improve transparency, consistency, and market integrity within the RPS framework. However, the draft 10th Edition of the RPS Eligibility Guidebook does not address prior comments submitted by CRS and the U.S. EPA's Green Power Partnership (GPP) regarding ambiguities in Renewable Energy Certificate (REC) retirement procedures and their implications for both compliance and voluntary markets.

CRS urges the CEC to adopt explicit corrective language in Chapter 7 of the RPS Guidebook to clarify REC retirement procedures and ensure alignment with CPUC Decision 17-06-026 and federal consumer protection standards on renewable energy claims.

BACKGROUND ON CRS AND GREEN-E®

CRS is a 501(c)(3) nonprofit organization that creates policy and market solutions to advance sustainable energy. CRS provides technical guidance to policymakers and regulators on matters related to renewable energy policy design, program implementation, energy and attribute accounting, certificate tracking and verification, market interactions, and disclosures and consumer protection. CRS also administers the Green-e® programs. For over 20 years, Green-e® has been the leading independent certification for voluntary renewable electricity products in North America. In 2023, Green-e® certified retail sales of nearly 125 million megawatt-hours (MWh), serving over 1.3 million retail purchasers of Green-e® certified renewable energy, including nearly 300,000 businesses.¹

Outstanding Concern: Ambiguity in REC Retirement for RPS Subaccounts

The draft Guidebook continues to allow LSEs to retire RECs in their RPS compliance subaccounts in excess of RPS obligations, without sufficient guidance on how such retirements interact with voluntary market claims. This creates several risks, including market confusion, inconsistency with CPUC Decision 17-06-026, and undermining of consumer protection and market integrity. RECs retired in an RPS compliance subaccount cannot credibly support voluntary claims and should not be marketed as such.

Recommended Insertions to Chapter 7 of the RPS Eligibility Guidebook

CRS recommends that the CEC insert the following clarifying language into Chapter 7 (“Annual Load-Serving Entity Reports”) of the 10th Edition Guidebook:

“All Renewable Energy Certificates (RECs) retired within an LSE’s RPS compliance subaccount in WREGIS are used exclusively for RPS compliance and may not form the basis of any voluntary renewable energy claim.”

¹ See the 2024 (2023 Data) Green-e® Verification Report here for more information: <https://resource-solutions.org/g2024/>.

If an LSE retires RECs in excess of its RPS compliance requirement, those RECs must either: (1) remain banked for future RPS compliance periods, or (2) be retired in a separate voluntary subaccount in WREGIS, labeled accordingly, if intended to support voluntary renewable energy claims.”

This distinction ensures that RECs retired for compliance are not concurrently or subsequently claimed for voluntary purposes, consistent with CPUC Decision 17-06-026 and with consumer protection standards regarding double counting and double claims.

Additional Recommendation: Staff Guidance and Outreach

CRS recommends that, upon adoption of the revised Guidebook, the CEC issue staff guidance explaining how these clarifications apply to Community Choice Aggregators (CCAs) and other LSEs with “100% renewable” or “opt-up” products, coordinate with WREGIS administrators to ensure proper use of voluntary subaccounts, and conduct outreach to ensure that local governments and LSE customers understand how these updates affect eligible claims.

Conclusion

CRS appreciates the CEC’s continued engagement with stakeholders on strengthening California’s RPS and ensuring market transparency. We urge the Commission to adopt the clarifying language above in the final RPS Eligibility Guidebook, 10th Edition to preserve the credibility of both compliance and voluntary renewable energy markets and to align California’s framework with national best practices.

Sincerely,

Lucas Grimes

Senior Manager, Policy