

DOCKETED	
Docket Number:	21-RPS-02
Project Title:	Renewables Portfolio Standard 10th Edition Guidebook Update
TN #:	266691
Document Title:	Steve Uhler Comments - RPS-2021-02 Rooftop PV Ratepayer guidelines
Description:	N/A
Filer:	System
Organization:	Steve Uhler
Submitter Role:	Other Interested Person
Submission Date:	10/20/2025 3:31:50 PM
Docketed Date:	10/20/2025

*Comment Received From: Steve Uhler
Submitted On: 10/20/2025
Docket Number: 21-RPS-02*

RPS-2021-02 Rooftop PV Ratepayer guidelines

RPS-2021-02 Rooftop PV Ratepayer guidelines

Please see that there is a way to ensure rooftop solar is not double counted by allowing ratepayers to register their system so no one else can claim renewable energy credit.

Steve Uhler
sau@wwmpd.com

Additional submitted attachment is included below.

DOCKETED

Docket Number:	21-RPS-02
Project Title:	Renewables Portfolio Standard 10th Edition Guidebook Update
TN #:	239569
Document Title:	Steve Uhler Comments - RPS-21-02 Rooftop PV Ratepayer guidelines
Description:	N/A
Filer:	System
Organization:	Steve Uhler
Submitter Role:	Other Interested Person
Submission Date:	8/31/2021 10:16:24 PM
Docketed Date:	8/31/2021

*Comment Received From: Steve Uhler
Submitted On: 8/31/2021
Docket Number: 21-RPS-02*

RPS-21-02 Rooftop PV Ratepayer guidelines

RPS-21-02 Rooftop PV Ratepayer guidelines

There needs to be guidelines for rooftop PV Ratepayers.

To prevent double counting of renewable attributes, if a ratepayer uses a non-WREGIS renewable energy certificate tracking system or no tracking at all, there needs to be a way to register with the Energy Commission to prevent anyone else from registering their renewable energy facility with WREGIS.

Many homes with rooftop PV may have more than one meter tracking generation.

New homes will be built to Title 24 JA11.5.1 Remote Monitoring Capability, some with PV system revenue grade metering with read tolerances of $\pm 0.5\%$. Existing homeowners may also choose a JA11.5.1 revenue grade metering system for their rooftop PV.

The JA11.5.1 revenue grade meter will most likely be in a system that has a revenue grade meter in use by their electric service for net energy metering. To prevent against the PV facility owner's wishes, the inadvertent registering with WREGIS, the PV facility by the electric service, a tracking system to prevent double or unauthorized registering is required.

Pursuant to Public Utilities Code - PUC 399.21. (a) (1), The Public Utilities Commission and the Energy Commission shall ensure that the tracking system established pursuant to subdivision (c) of Section 399.25, is operational, is capable of independently verifying that electricity earning the credit is generated by an eligible renewable energy resource, and can ensure that renewable energy credits shall not be double counted by any seller of electricity within the service territory of the WECC.

Pursuant to Public Utilities Code - PUC 399.25. (b), The Energy Commission is to design and implement an accounting system to verify compliance with the renewables portfolio standard by retail sellers and local publicly owned electric utilities, to ensure that electricity generated by an eligible renewable energy resource is counted only once for the purpose of meeting the renewables portfolio standard of this state or any other state, to certify renewable energy credits produced by eligible renewable energy resources, and to verify retail product claims in this state or any other state.

Steve Uhler
sau@wwmpd.com