

DOCKETED	
Docket Number:	25-OIR-02
Project Title:	Energy Data Collection - Phase 3 Gas Data
TN #:	268011
Document Title:	Steve Uhler Comments - Additions to express terms and missing docket public records
Description:	N/A
Filer:	System
Organization:	Steve Uhler
Submitter Role:	Other Interested Person
Submission Date:	12/20/2025 1:36:58 PM
Docketed Date:	12/22/2025

Comment Received From: Steve Uhler
Submitted On: 12/20/2025
Docket Number: 25-OIR-02

Additions to express terms and missing docket public records

Additions to express terms and missing docket public records

Perhaps energy from biomethane use will be double counted?

Please reference the system for tracking and verifying the use of biomethane under RPS, in the express terms.

399.12.6. (d) PUC-ARTICLE 16. California Renewables Portfolio Standard Program
399.11-399.33

(d) All sellers and purchasers of biomethane shall comply with a system for tracking and verifying the use of biomethane, as established by the Energy Commission, that is equivalent to the system required by subdivision (c) of Section 399.25.

399.25. (c) PUC-ARTICLE 16. California Renewables Portfolio Standard Program
399.11-399.33

(c) Establish a system for tracking and verifying renewable energy credits that, through the use of independently audited data, verifies the generation of electricity associated with each renewable energy credit and protects against multiple counting of the same renewable energy credit. The Energy Commission shall consult with other western states and with the WECC in the development of this system.

Perhaps CCR 20 Section 2507. Disclosure of Confidential Records should be included in the 25-OIR-02 rulemaking to ensure references remain correct?

Use of the terms "End User" and "Customer" appear inconsistent when the term "end use customer" is used. Express terms state "End user" means any company that consumes electricity or natural gas for its own use and not for resale. It also states "Customer" means an active billed account, of a UDC, an LSE, or a gas utility. Section 1350. Exemptions. (b)(2) "Small gas utility" means a gas utility that has delivered 50 billion cubic feet of natural gas or less to end use customers in both of the two calendar years preceding the required filing date.

Please file in docket 25-OIR-02, the OAL approved Form 400 with OAL File Number that was submitted and approved to publish notice of the rulemaking in the California Regulatory Notice Register.

Steve Uhler
sau@wwmpd.com