

## DOCKETED

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**on 15-Day Language**

*Additional submitted attachment is included below.*

STATE OF CALIFORNIA ENERGY RESOURCES CONSERVATION  
AND DEVELOPMENT COMMISSION

In the Matter of:

Rulemaking to Consider Modifications to the  
Electricity Generation Source Disclosure Regulations

Docket No. 14-OIR-01

**CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION  
COMMENTS ON 15-DAY LANGUAGE**

The California Municipal Utilities Association (“CMUA”) appreciates the opportunity to provide comments to the California Energy Commission (“Commission”) on the proposed *15-Day Language*, issued on March 29, 2016. CMUA commends Commission staff for working to address many of the key concerns raised by stakeholders in this proceeding. The 15-Day Language revisions reduce confusion and unnecessary administrative burdens, while maintaining the integrity of the program. In particular, CMUA supports the proposed revisions that will: (1) allow a public agency to self-attest at least one electric service product, even if more than one product is provided by the public agency; (2) remove the reference to “non-California eligible renewable products”; and (3) delete the requirement to report WREGIS certificate numbers. CMUA urges the Commission to adopt the Express Terms as proposed in the 15-Day Language.

While CMUA supports the adoption of the 15-Day Language, CMUA strongly recommends that the Commission initiate a new proceeding to address the many outstanding issues with the Power Source Disclosure Program (“PSDP”). The primary focus of this successor proceeding should be addressing the confusion that can result due to differences

between the PSDP regulations and the Renewables Portfolio Standard (“RPS”) Program. Despite the statutory limitations on the Commission’s ability to reform the PSDP, there are likely additional steps that the Commission can take to make the Power Content Label more useful for customers. For example, the Power Content Label should use terminology that is more consistent with the RPS, provide simple information that highlights the differences between the two programs, and also direct consumers and interested stakeholders to where additional information can be found.

CMUA appreciates the opportunity to provide comments on the 15-Day Language.

Dated: April 14, 2016

Respectfully submitted,



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