

DOCKETED	
Docket Number:	26-PSDP-01
Project Title:	Power Source Disclosure Program - 2025
TN #:	273064
Document Title:	CEC Staff Explanation of 2025 Unspecified Power Fuel Mix and Greenhouse Gas Emissions Intensity Calculations
Description:	N/A
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Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	10/7/2026 10:02:27 AM
Docketed Date:	10/7/2026



MEMORANDUM

TO: Reporting Entities and All Persons Interested in the Power Source Disclosure Program
FROM: Energy Assessments Division Staff
SUBJECT: CEC Staff Explanation of 2025 Unspecified Power Fuel Mix and Greenhouse Gas Emissions Intensity Calculations
DATE: October 7, 2026

Background

Retail suppliers are required to annually disclose on a Power Content Label (PCL) the power mix and greenhouse gas emissions intensity associated with each electricity portfolio offered to their customers. As amended on June 18, 2025, Title 20 of the California Code of Regulations requires two new elements to be included on the Power Content Label starting this year. This memo provides context to these additions, including the calculations used to generate the information.

- Section 1393.1(c)(7) requires that the unspecified power derived primarily from either renewable and zero-carbon resources or fossil fuels be displayed as percentages on the Power Content Label starting in 2026 (reporting 2025 data).
 - Section 1393.1(l)(3) states that a “footnote [on the PCL] shall also provide the percentage of the secondary resource group, as specified under Section 1393.1(c)(2)(A)-(B), serving unspecified power in the previous year.”
- Section 1392(b)(4) requires California Energy Commission (CEC) staff to calculate the annual GHG emissions intensity of unspecified power. That emissions intensity “shall be calculated as the sum of all GHG emissions associated with unspecified imports, unclaimed in-state natural gas resources, and oversupply divided by the sum of all MWh associated with unspecified imports, unclaimed in-state natural gas resources, and oversupply, taking cogeneration into account using the method provided in Section 1392(a)(6)(E).”

2025 Unspecified Power Fuel Mix and Greenhouse Gas (GHG) Emissions Intensity

92% of unspecified power was derived from fossil fuels and 8% was derived from renewables and zero-carbon resources. The 2025 GHG emissions intensity associated with procurements of unspecified power was 0.463 metric tons of carbon dioxide equivalent per megawatt hour (MT CO₂e/MWh). Below is an explanation of these calculations.

Total California loss-adjusted load

Section 1393.1(a)(3) requires the CEC to provide the fuel mix and GHG emissions intensity of total California loss-adjusted load, which is the sum of all electricity supporting retail sales in CA

after accounting for transmission and distribution losses, as reported to the PSD program. The 2025 PCL will display that for the California Utility Average.

Fuel Mix Calculations

For the 2025 PCL, the fuel mix of unspecified power was calculated based on the resources reported on the 2025 Power Source Disclosure (PSD) annual reports (see Docket No. 26-PSDP-01) in excess of retail suppliers' loss-adjusted loads (oversupply), in-state natural gas generation that was not claimed as a specified procurement on PSD annual reports, and unspecified imports.

- Of the 8,153,171 MWh of generation reported as oversupply on 2025 PSD annual reports, 4,469,323 MWh came from fossil fuel resources, and 3,683,848 MWh came from renewables and zero-carbon resources.
- Energy Commission staff compared 2025 PSD reported in-state specified natural gas procurements with 2025 Quarterly Fuel and Energy Report (QFER) in-state natural gas generation and identified 38,684,574 MWh of unclaimed in-state natural gas generation that was available to serve retail load.
- All unspecified imports identified under the 2025 Total System Electric Generation were reported to PSD either as a direct procurement or as part of a bulk purchase from an asset-controlling supplier. Consequently, those unspecified imports were already claimed by California retail suppliers and there were no additional unspecified imports to account for in the 2025 unspecified power mix.

The resulting unspecified power fuel mix calculations are as follows:

Data Set	Fossil Fuels	Renewables and Zero-Carbon Resources
Oversupply Disclosed on PSD Annual Reports	4,469,323	3,683,848
Unclaimed In-State Natural Gas (QFER – PSD)	38,684,574	0
Unspecified Imports	0	0
Total (MWh)	43,153,897	3,683,848
Unspecified Power Fuel Mix %	92%	8%

GHG Emissions Intensity Calculations

In prior years the GHG emissions intensity of unspecified power reported on PSD annual reports was assigned a default emissions factor of 0.428 MT CO₂e/MWh. For 2025 PSD and PCL data and subsequent years, the unspecified power GHG emissions factor will be calculated based on oversupply, unclaimed in-state natural gas, and unspecified imports.

- In 2025, the 8,153,171 MWh of oversupply reported on PSD annual reports emitted 2,067,731 MT CO₂e.
- The 38,684,574 MWh of unclaimed in-state natural gas generation emitted 19,615,078 MT CO₂e.
- As noted above, there were no additional unspecified imports into California according to 2025 Total System Electric Generation.

The resulting unspecified power GHG emissions factor calculations are as follows:

Data Set	GHG Emissions (MT CO₂e)	MWh	GHG Emissions Intensity (MT CO₂e/MWh)
Oversupply Disclosed on PSD Annual Reports	2,067,731	8,153,171	0.254
Unclaimed In-State Natural Gas (QFER – PSD)	19,615,078	38,684,574	0.507
Unspecified Imports	0	0	0.428
Total	21,682,809	46,837,745	0.463

The 2025 GHG emissions intensity for unspecified power consumed in California was **0.463 MT CO₂e/MWh**. This value exceeds the previously static emissions intensity for unspecified power (0.428 MT CO₂e) because unclaimed in-state gas resources had a relatively high average emission intensity compared to the other streams of unspecified power.

Discrepancies Between PSD and QFER data

Energy Commission staff identified instances in which specified procurements of natural gas reported on PSD annual reports exceeded QFER natural gas net generation totals. Staff did not factor out any potential overclaims of PSD-reported gas generation and the total quantity of such generation was less than half a percent of the total unclaimed in-state natural gas generation.