



California Municipal Utilities Association

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July 1, 2015

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 14-OIR-01
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

14-OIR-01

TN 76014

JUL 01 2015

Re: **14-OIR-01: Power Source Disclosure Program & Power Content Label Amendments**

The California Municipal Utilities Association (CMUA) appreciates the opportunity to submit post-workshop comments on issues raised at the May 28th workshop as part of Pre-Rulemaking Draft Regulations for Power Source Disclosure (PSD) program, and changes to the Power Content Label (PCL). CMUA provided verbal comments at the workshop and provides these comments on the CEC's draft amendments. Also, individual CMUA members will provide additional comments on proposed rule amendments.

CMUA represents the vast majority of California's publically-owned utilities (POUs) and members' interests on both energy and water issues. CMUA members have demonstrated leadership on environmental initiatives including, reducing the impacts of climate change, and implementing local utility energy-efficiency and Renewable Portfolio Standard (RPS) programs to meet a 33 percent RPS goal by 2020.

A. CMUA supports a comprehensive change to PSD/PCL annual reporting program and the June 1st reporting date.

CMUA participated in the May 28th workshop and supports the CEC to amend the current PSD/PCL program to better reflect the CEC's RPS program. CMUA encourages the CEC to adjust the program to better align with the RPS program, helping to provide consistent information to California utility customers. Currently, PCL information reflects the past year's energy portfolio, and unfortunately does not accurately reflect the utility's retired renewable energy credit (REC) amounts versus total energy procured through the RPS reporting platform: the Western Renewable Energy Generation Information System (WREGIS).

We also support under Section 1394, the revised annual reporting due date of June 1st each calendar year. And as we have suggested in previous regulatory efforts, the CEC should re-examine the amount of information that POUs are currently reporting to the CEC annually, with the goal to eliminate any conflicting or redundant reporting requirements.

B. CMUA suggests that the PCL be adjusted to provide greater clarity to the energy consumer.

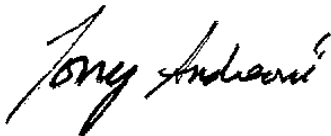
On page A-5 in CEC's Power Source Disclosure Program Draft Regulations staff report, the modified PCL needs to reflect current information, and be clear to all California energy customers. As an example, the CEC is proposing to add a number of footnotes in the PCL to better describe the annual power mix. Unfortunately, the added footnotes and any correlation with CEC's RPS program are not obvious to energy customers. The PCL template needs to be simple and straightforward for customers.

CMUA suggests the following changes to the draft PCL to help better define utility specific power mix, including renewables and RECs, within the template:

- The draft PSD/PCL rule defines "electricity products" and "REC Only" with a REC defined within the "REC Only" definition, creating further confusion. The CEC should use what is in statute, "electric sources."
- "Small" hydroelectric resources should be classified as "eligible hydroelectric" resources, as required by AB 162.
- CMUA agrees with verbal comments made by NCPA at the CEC workshop that no additional attestation of PCL data is required, as the information sent to the CEC by a local utility comes from the authorized agent.
- "RECs Only" should be included under the applicable category (e.g., wind, solar, etc.) consistent with state law.
- The CEC should consider structural changes to the PCL form that allow utilities to show deferred RPS eligible generation from the current year carried into a future year.

CMUA appreciates the opportunity to submit these comments to the CEC as a final rule is developed. Should you have any questions, please contact me at 916.326.5800.

Sincerely;



Tony Andreoni, P.E.
Director of Regulatory Affairs