

## DOCKETED

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## **California Cogeneration Council comments on proposed amendments to QFER data requirements**

The CEC is proposing to amend its regulations specifying data collection and disclosure found in the CA Code of Regulations, Title 20, sections 1301 et seq. and 2501 through 2511. CEC states this is necessary to help the Commission implement provisions of SB 350 and AB 802.

California Cogeneration Council member facilities will be impacted by the changes proposed to Section 1304 Power Plant Reports “ refer to pages 19 “ 22.

Below is the specific language that will require additional information from cogenerators, regardless of size:

8. for cogenerators providing thermal energy to an entity on site, monthly useful thermal energy production of each cogenerator, in British thermal units;
9. for cogenerators providing thermal energy to commercial end users or industrial end-users, sales of useful thermal energy to those end users, classified by Customer Classification Code, in British thermal units, excluding sales to the wholesale market or LSEs; and

Instead of requiring just data for fuel attributable to useful thermal, CEC will require the thermal energy production, and sales of thermal to end users. The CCC suggests that, since this exercise is pursuant to the goals of SB 350 and AB 802, the CEC synchronize its data requirements with data already collected by ARB under the Mandatory Reporting Regulation. This information is collected by several different entities and could be easily calculated with the information in the market, thus it is not confidential (as it once was). We don't expect it will be a burden on the cogenerator to comply with this data request, however, the agencies should strive for standardization.