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<th><strong>Docket Number:</strong></th>
<th>16-OIR-05</th>
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<tr>
<td><strong>Project Title:</strong></td>
<td>Power Source Disclosure - AB 1110 Implementation Rulemaking</td>
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<tr>
<td><strong>TN #:</strong></td>
<td>222428</td>
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<tr>
<td><strong>Document Title:</strong></td>
<td>Steve Uhler Comments Wrong silo</td>
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<tr>
<td><strong>Description:</strong></td>
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<td><strong>Filer:</strong></td>
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<td><strong>Organization:</strong></td>
<td>Steve Uhler</td>
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<td><strong>Submission Date:</strong></td>
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Wrong silo?

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Perhaps Energy Assessments Division would be a better silo than Renewable Energy Division for AB1110 power source disclosure?

Renewables don't have to load follow. Power source disclosure should make that clear that renewables don't have to load follow. When a customer makes a decision to purchase power by flipping a switch, the customer should know when they are causing fossil fuels to be burned. 100% renewables customers should pay attention to this when being told by a retail supplier they can deliver 100% renewables.

Renewables must load follow to get to zero emissions. No more time should be wasted in changing renewables so they must load follow. Renewables can't load follow if they are not connected so they are delivered to to customer who flips the switch.

By law, all retail suppliers must display a label in product-specific written promotional materials, and must send their customers annual label updates. The retail supplier must validate these claims at the end of the year through an independent audit. In this way, consumers can feel confident that retailers purchase what the consumer "pays for."

As found on http://energy.ca.gov/pcl/background.html

Consumers can't feel confident that retailers purchase what the consumer "pays for" if the Energy Commission does not follow up on reports of power source disclosure violations. Perhaps the Renewable Energy Division is judged only the quantity of renewables and not the delivered quality?

Not much use for stoichiometry in renewables, I would think that stoichiometry would of been the first way to do greenhouse gas power source disclosure?

Most of power source disclosure could be done with zero burden on the retail seller and done scientifically instead of marketing speak.

Energy Assessment Division's modeling should be able to produce a power content label that can be used to make decisions on what type and where the public will purchase energy. This would reduce the pig in a poke natural of the current power source disclosure system.

A pig in a poke means you buy not knowing what you get until after the purchase, when the pig is let out of the bag. This can lead to disappointment for the consumer, which is generally frowned upon.

ever onward,

Steve Uhler
sau@wwmpd.com

Additional submitted attachment is included below.
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