

DOCKETED

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OIR-16-05 Electricity service product definition and other questions

Additional submitted attachment is included below.

Power Source Disclosure - AB 1110 Implementation Rulemaking, 16-OIR-05

Why is “electric service product” used on the power content label examples and in Section 1392, yet is crossed out in 1391. Definitions and elsewhere in the regulations?

Renewable Energy Credits (RECs) are a concept used in the RPS program. It appears that Power Source Disclosure uses the same definition, how will double counting be prevented?

Should voluntary electricity portfolios customers be notified on the power content label, if the retail supplier is using the customers renewable energy use to reduce their retail sales under the RPS program 399.30(c)(4)?

Why does the power content label examples show kilograms, when 1394(c)(3) call for pounds?

Why does subdivision 1394(h)(2) reference non-existing subdivision 1394(g)(1)?

Why is unbundled RECs percentage blank in the “CA Total Mix” column in example power content labels?

Are product content labels the same as power content labels under CEC regulations?

How does a retail supplier provide a power content label for any new marketing or retail product claims related to the GHG emissions intensity of a new electricity portfolio?

Why doesn't Facility Name populate when the EIA ID is entered in Schedule 1?

Why does Schedule 3 say “Percentage of Retail Sales Covered by Retired Unbundled RECs” and example power content labels say “Unbundled RECs are not reflected in the power mix or GHG emissions intensities above.”? This appears to not be consistent as to power mix as required by the second 1394(a)(1). There appears to be two 1394 sections. First one is Data Reporting, second is Retail Disclosure to Consumers.

Are unbundled RECs in voluntary electricity portfolios (electric service products?) conveyed as property of the retail customer and are not to be counted for RPS compliance?

May customers of voluntary electricity portfolios claim these unbundled RECs listed on the power content label as offsets for non-electricity energy use?

How will the retail customer be notified of any resold RECs per 1393(a)(2)?

Are unbundled RECs included in the reporting requirements of 1393(a)(2)?

Staff have allowed retail suppliers to not supply a power content labels to voluntary green product customers. Do the regulations allow the staff to waive the customer's right to a power content label?

Will retail suppliers be allowed to submit power content labels that don't comply with the format, such as https://www.energy.ca.gov/pcl/labels/2009_labels/3%20Phases%202009%20PCL.pdf as found on https://www.energy.ca.gov/pcl/labels/2009_index.html . In this example, is this what 3 Phases submitted, or is it a personation? See <https://en.wikipedia.org/wiki/Personation> .

Thanks,

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