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1391. Definitions.

"Total California system electricity" means the sum of all in-state generation and net electricity imports by fuel type.

1394.1 (c) (3) shows new amendments (underlined) requiring disclosure of the greenhouse gas emissions intensity for California total system electricity.

1394.1. Retail Disclosure to Consumers (c) (3)

GHG emissions intensity of each electricity portfolio and of California total system electricity in accordance with the calculation method specified in subdivision 1393(c), expressed in pounds of CO₂e per megawatt hour. This information shall also be displayed graphically in a bar chart.

1393 (c) does not define an equation for statewide retail electricity sales based on the greenhouse gas emissions for total California system electricity that matches equations in subsection 1393 (a).

The Energy Commission shall implement Public Utilities Code - PUC 398.4. (k) (2) (B).

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(B) Calculate the greenhouse gas emissions intensity associated with statewide retail electricity sales based on the greenhouse gas emissions for total California system electricity.

If 1393. Accounting Methodology (c) (4) (B) describes the equation greenhouse gas emissions for total California system electricity and total California system electricity is defined as the sum of all in-state generation and net electricity imports by fuel type (wholesale). There will be a GHG comparing of wholesale to retail, if 1393 (a) (6) is used to calculate the greenhouse gas emissions intensity associated with retail electricity portfolios.

1393. Accounting Methodology (c) (4) (B)

Divide the sum of all GHG emissions attributable to the electricity portfolio by the retail sales of the electricity portfolio as follows:

Equation 9: $EI = E / RS$

Where:

EI = GHG emissions intensity of electricity portfolio for the reporting period

E = Sum of GHG emissions attributable to electricity portfolio

RS= Retail sales of electricity portfolio

Perhaps the equations in 1393 (a) are not consistent with PUC 398.4. (k) (2) (B) to calculate the greenhouse gas emissions intensity associated with statewide retail electricity sales based on the greenhouse gas emissions for total California system electricity?

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