

DOCKETED

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Powerex Comments on the Modification of Regulations Governing the Power Source Disclosure Program

See attached

Additional submitted attachment is included below.

October 28, 2019

California Energy Commission Docket Office
Docket No. 16-OIR-05
1516 Ninth Street, MS-45
Sacramento, CA 95814

Re: Docket 16-OIR-05: Powerex Corp.'s Comments on the Modification of Regulations Governing the Power Source Disclosure Program

Powerex Corp. ("Powerex") appreciates the opportunity to submit comments on the Modification of Regulations Governing the Power Source Disclosure Program (the "Proposed Modifications"). The California Energy Commission (the "CEC") initiated this rulemaking in order to implement AB 1110, which requires, among other things, the CEC to adopt a method to disclose the greenhouse gas ("GHG") intensity of the electricity provided by retail suppliers to their customers. Additionally, as part of the rulemaking process, the CEC has taken certain steps to clarify the methodology for determining and reporting the power mix of the electricity that retail suppliers provide to their customers.

Powerex, with its principal place of business in Vancouver British Columbia, is the wholly-owned energy marketing subsidiary of the British Columbia Hydro and Power Authority ("BC Hydro"), a provincial Crown Corporation owned by the Government of British Columbia. Powerex sells wholesale power in the United States pursuant to market-based rate authority, first granted by the Federal Energy Regulatory Commission ("FERC") in September 1997.

Powerex has a long history of delivering low-carbon, zero-carbon and renewable energy to California. Powerex sells power from a portfolio of resources in the United States and Canada, including Canadian Entitlement resources made available under the Columbia River Treaty, BC Hydro system capability, and various other power resources acquired from other sellers within the United States and Canada.

Powerex is also registered with the California Air Resource Board ("CARB") as an Asset Controlling Supplier ("ACS"). The Powerex ACS system mix is dominated by zero-carbon hydroelectric resources, although it does contain other technology types, and has a low-carbon intensity.¹

Pursuant to the Proposed Modifications, energy that is directly delivered to California from an ACS system shall be considered, under the Power Source Disclosure program, at the CARB-assigned carbon emission factor. Additionally, an ACS may provide its system mix, consistent with its CARB-assigned emission factor, to the CEC by February 1 of each year. If the ACS provides its system mix to the CEC, the ACS energy directly delivered to California in the previous year will be broken down into its respective technology types for power mix disclosure

¹ Powerex's CARB-assigned ACS emission factor has ranged from about 0.0205 MT CO₂e per MWh to about 0.0469 MT CO₂e per MWh compared to 0.428 MT CO₂e per MWh for unspecified energy. ACS emission factors are available on the CARB website at <https://ww2.arb.ca.gov/mrr-acs>



purposes (e.g. hydro, wind, solar, unspecified etc...). If the ACS does not provide its system mix to the CEC, Powerex understands that the ACS energy directly delivered to California in the previous year shall be considered as unspecified energy for power mix disclosure purposes, but will still be considered at its CARB-assigned carbon emission factor for carbon intensity purposes.

Powerex requests clarification on one issue related to its ACS system mix. Powerex has a number of renewable resources that form part of its ACS system that are not California eligible renewable energy resources. For example, Powerex may have solar, wind and biomass facilities within its portfolio of resources that are not CEC certified facilities. For power mix purposes, Powerex asks for clarification on how should a renewable resource, that is not a California eligible renewable energy resource, within Powerex's ACS portfolio be listed on its ACS system mix disclosure filing with the CEC.

Powerex wants to specifically recognize and thank CEC staff for their diligent efforts during both the pre-rulemaking process and the rulemaking process. CEC staff have worked collaboratively with stakeholders throughout the process and Powerex greatly appreciates the efforts staff have made to create fair and transparent rules for ACS systems to participate in the Power Source Disclosure program.

Kind regards,

/s/

Mike Benn
Energy Trade Policy Analyst
Powerex Corp.