

**DOCKETED**

<b>Docket Number:</b>	16-OIR-05
<b>Project Title:</b>	Power Source Disclosure - AB 1110 Implementation Rulemaking
<b>TN #:</b>	230951
<b>Document Title:</b>	Steve Uhler Comments - OIR-16-05 Inconsistent use, Generator versus Generating unit
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Steve Uhler
<b>Submitter Role:</b>	Other Interested Person
<b>Submission Date:</b>	12/2/2019 1:53:00 PM
<b>Docketed Date:</b>	12/2/2019

*Comment Received From: Steve Uhler*  
*Submitted On: 12/2/2019*  
*Docket Number: 16-OIR-05*

## **OIR-16-05 Inconsistent use, Generator versus Generating unit**

OIR-16-05 Inconsistent use, Generator versus Generating unit

There appears to be inconsistent use of "Generator" when "Generating unit" is intended based on 1391 Definitions. These uses of "Generator" when "Generating unit" is intended are in 1391, 1392, 1393 and 1394.

Reason I believe this is, form EIA-923 applies to power plant and prime mover level, not generators. See 1393. Accounting Methodology (c)(2)(E) for reference to generator and form EIA-923.

Please review the use of "Generator" when "Generating unit" is intended in 1391, 1392 ,1393 and 1394.

1391. Definitions.

"Generating unit" means a device that converts mechanical, chemical, electromagnetic, or thermal energy into electricity and that:

- (1) has an electric output capable of being separately identified and metered;
- (2) is connected to the Western Electricity Coordinating Council interconnected grid; and
- (3) is capable of producing electrical energy in excess of a generation station's internal power requirements.

"Generator" means the initial seller of electrical energy produced by a generating unit.

Steve Uhler  
sau@wwmpd.com