

**DOCKETED**

<b>Docket Number:</b>	16-OIR-05
<b>Project Title:</b>	Power Source Disclosure - AB 1110 Implementation Rulemaking
<b>TN #:</b>	231088
<b>Document Title:</b>	Silicon Valley Clean Energy comments on the Revised Modifications of Regulations Governing the Power Source Disclosure Program
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Silicon Valley Clean Energy/Hilary Staver
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	12/10/2019 4:27:28 PM
<b>Docketed Date:</b>	12/10/2019

*Comment Received From: Hilary Staver*  
*Submitted On: 12/10/2019*  
*Docket Number: 16-OIR-05*

**Silicon Valley Clean Energy comments on the Revised Modifications of Regulations Governing the Power Source Disclosure Program**

*Additional submitted attachment is included below.*



333 W El Camino Real, Suite 290 | Sunnyvale, CA 94087 | 1-844-474-SVCE (7823) | [SVCleanEnergy.org](http://SVCleanEnergy.org)

December 10, 2019

California Energy Commission  
Docket Unit, MS-4

1516 Ninth Street  
Sacramento, CA 95814-5512

**Re: SVCE Comments on the Revised Modifications of Regulations Governing the Power Source Disclosure Program, Docket No. 16-OIR-05**

Dear Commissioners:

Silicon Valley Clean Energy ("SVCE"), a community choice aggregator ("CCA") that provides electricity to twelve cities and the unincorporated areas of Santa Clara County, respectfully submits the following comments on the 15-Day Language on Modifications of Regulations Governing the Power Source Disclosure Program released by the CEC on November 25, 2019.

SVCE requests that the definition of "specified purchase" in §1391 be amended to allow CCA customers to claim the benefits of GHG-free resources they have already paid for via the Power Charge Indifference Adjustment ("PCIA") on their Power Content Labels ("PCLs") for the 2019 and 2020 portfolios.

As part of an ongoing process of PCIA reform at the California Public Utilities Commission, CCAs, Pacific Gas & Electric, and other stakeholders have jointly developed a proposal whereby CCA customers can be allocated the benefits of GHG-free resources they have already paid for through the PCIA (see PG&E AL 5705-E). However, as detailed in the comments of the California Community Choice Association ("CalCCA"), the current definition of "specified purchase" makes it infeasible to implement this proposal in time to be reflected on the PCLs for the 2019 and 2020 portfolios. SVCE supports CalCCA's proposed amendments to this definition, or alternative solutions from the CEC that achieve the same result.

Thank you for your consideration of this issue and for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Hilary Staver".

Hilary Staver  
Manager of Regulatory and Legislative Affairs