

**DOCKETED**

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## **SB-100-19 Rulemaking required to comply with PUC 454-53(d)(1)**

SB-100-19 Rulemaking required to comply with PUC 454.53(d)(1)

What programs have been identified to need rulemaking to comply with not allowing resource shuffling and Public Utilities Code - PUC 454.53. (d) (1) Utilize programs authorized under existing statutes to achieve the policy described in subdivision (a)?

One program that is known to the Energy Commission to use resource shuffling is the power source disclosure program. Resource shuffling is used to balance equations for greenhouse gas calculations. This excludes the electricity consumed by line, switching and transformer losses. It allows the shuffling of greenhouse gas producing generation out of these equations.

All that is required to correct this is to sum the losses and count the greenhouse gases against the products sold in retail sales.

The Energy Commission will be knowingly in violation of PUC 454.53(a) until a rulemaking to correct this known resource shuffling is completed.

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