

DOCKETED

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PSDP-19-01 Resource Shuffling and 2018 power content labels

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Perhaps Energy Commission staff have overlooked Public Utilities Code - PUC 454.53. (Added by Stats. 2018, Ch. 312, Sec. 5. (SB 100)) became effective January 1, 2019.

What is the Energy Commission doing to ensure the commission complies with Public Utilities Code - PUC 454.53. (a)?

PUC 454.53. (a) It is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. The achievement of this policy for California shall not increase carbon emissions elsewhere in the western grid and shall not allow resource shuffling. The commission and Energy Commission, in consultation with the State Air Resources Board, shall take steps to ensure that a transition to a zero-carbon electric system for the State of California does not cause or contribute to greenhouse gas emissions increases elsewhere in the western grid, and is undertaken in a manner consistent with clause 3 of Section 8 of Article I of the United States Constitution. The commission, the Energy Commission, the State Air Resources Board, and all other state agencies shall incorporate this policy into all relevant planning.

The attached SMUD power content label claims wind power.

Pursuant to Section 1391. Definitions. (b):

(b) "Electric service product" means the electrical energy produced by a generating facility that a retail seller offers to sell to consumers in California under terms and conditions specific to an offer or to a tariff. It does not include the provision of electric services on site, sold through an over-the-fence transaction, as defined in Section 218 of the Public Utilities Code, or sold or transferred to an affiliate, as defined in subdivision (a) of Section 372 of the Public Utilities Code.

SMUD does not deliver wind power to SMUD customers based on EIA data.

What allows SMUD to claim and the Energy Commission to produce a power content label for SMUD that claims SMUD customers have received wind power?

SMUD SolarShares is not the retail sale of electrical energy produced by a generating facility. Why does it appear on the power content label?

End the use of resource shuffling now, correct the power content labels to comply with Public Utilities Code - PUC 454.53. (a).

Steve Uhler
sau@wwmpd.com

Additional submitted attachment is included below.

2018 POWER CONTENT LABEL					
Sacramento Municipal Utility District					
smud.org/SMUDPCL					
ENERGY RESOURCES	SMUD	Greenergy Partner	Greenergy PartnerPlus	SolarShares	2018 CA Power Mix**
Eligible Renewable	20%	100%	100%	100%	31%
Biomass & Biowaste	8%	0%	4%	0%	2%
Geothermal	2%	0%	0%	0%	5%
Eligible Hydroelectric	1%	0%	0%	0%	2%
Solar	2%	100%	86%	100%	11%
Wind	7%	0%	10%	0%	11%
Coal	0%	0%	0%	0%	3%
Large Hydroelectric	26%	0%	0%	0%	11%
Natural Gas	54%	0%	0%	0%	35%
Nuclear	0%	0%	0%	0%	9%
Other	0%	0%	0%	0%	<1%
Unspecified sources of power*	<1%	0%	0%	0%	11%
TOTAL	100%	100%	100%	100%	100%
* "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources.					
** Percentages are estimated annually by the California Energy Commission based on the electricity generated in California and net imports as reported to the Quarterly Fuel and Energy Report database and the Power Source Disclosure program.					
For specific information about this electricity product, contact:	Sacramento Municipal Utility District (SMUD) 888-742-7683				
For general information about the Power Content Label, please visit:	http://www.energy.ca.gov/pcl/				
For additional questions, please contact the California Energy Commission at:	Toll-free in California: 844-454-2906 Outside California: 916-653-0237				