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RPS-16-03 PUC 399-30(c)(4)-Participating customer-Retail sales-LTR-proximity

RPS-16-03 PUC 399.30(c)(4)-Participating customer-Retail sales-LTR- proximity

Tracking who is a "participating customer" so any renewable energy credits associated with electricity credited to a participating customer can be retired on behalf of the participating customer needs to be clarified.

The participating customer may be claiming renewable energy credits for themselves. They may be claiming credit when selling a home that is required to be powered by renewable generation pursuant to Section 10-115 of Title 24. Section 10-115(a)3A requires utility energy reduction credits that will result in virtual reductions in the building's energy consumption that is subject to energy bill payments. Section 10-115(a)5 requires the community shared solar electric generation system shall provide the energy savings benefits specified in Section 10-115(a)3 exclusively to the dedicated building. Those energy savings benefits shall in no way be attributed to other purposes or transferred to other buildings or property.

Before any subtraction from retail sales, the energy use has to be shown to produce a retail sale. Voluntary green pricing programs such as community shared solar electric generation system pursuant to Section 10-115 of Title 24 will result in virtual reductions in the building's energy consumption that is subject to energy bill payments and do not produce a retail sale of energy.

Staff proposes establishing the Long-Term Procurement Requirement as a procurement requirement in proposed section 3204 (d)(1). Any retail sales of kilowatthours generated by an eligible renewable energy resource that is credited to a participating customer pursuant to a voluntary green pricing or shared renewable generation program can not be used for compliance with procurement requirements.

Pursuant to Public Utilities Code - PUC 399.30. (c) (4), Beginning January 1, 2014, in calculating the procurement requirements under this article, a local publicly owned electric utility may exclude from its total retail sales the kilowatthours generated by an eligible renewable energy resource that is credited to a participating customer pursuant to a voluntary green pricing or shared renewable generation program. Any exclusion shall be limited to electricity products that do not meet the portfolio content criteria set forth in paragraph (2) or (3) of subdivision (b) of Section 399.16. Any renewable energy credits associated with electricity credited to a participating customer shall not be used for compliance with procurement requirements under this article, shall be retired on behalf of the participating customer, and shall not be further sold, transferred, or otherwise monetized for any purpose. To the extent possible for generation that is excluded from retail sales under this subdivision, a local publicly owned electric utility shall seek to procure those eligible renewable energy resources that are located in reasonable proximity to program participants.

The kilowatthours generated by an eligible renewable energy resource will need to be derated based on proximity. Transmission and distribution losses have to be considered. Voltage drop in transmission and distribution that require step-up transformers reduce the yield from the generation source. Voltage drop between generation and end use can be used to calculate the yield. Smart meters measure voltage and current, simple calculations can be done to find losses. Only renewable energy that reaches the end user as a retail sale can be subtracted from retail sales.

In closing,

Participating customer, how will they be tracked to ensure no double counting of credits.

Retail sales, to be subtracted or be considered a percentage of retail sales, the kilowatthours have to be sold at retail and sold only once to an end user.

Long-Term Procurement Requirement, the kilowatthours used to reduce retail sales pursuant to Public Utilities Code - PUC 399.30.(c)(4) can not be counted for Long-Term Procurement Requirement.

Proximity, the nearer the renewable generation source is to the retail end user, the easier it is to show the amount sold at retail due to lower losses in transmission and distribution.

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