

**DOCKETED**

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<b>Project Title:</b>	Amendments to Regulations Specifying Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities
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<b>Document Title:</b>	Steve Uhler Comments - RPS-16-03 SB 350 and ensuring that renewable energy credits shall not be double counted
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*Comment Received From: Steve Uhler*  
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## **RPS-16-03 SB 350 and ensuring that renewable energy credits shall not be double counted**

RPS-16-03 SB 350 and ensuring that renewable energy credits shall not be double counted

A section under Title 20 is required for the enforcement of the statutory provision pursuant to Public Utilities Code - PUC 399.21. (a) (1), The commission and the Energy Commission shall ensure that the tracking system established pursuant to subdivision (c) of Section 399.25, is operational, is capable of independently verifying that electricity earning the credit is generated by an eligible renewable energy resource, and can ensure that renewable energy credits shall not be double counted by any seller of electricity within the service territory of the WECC.

A section under Title 20 is required for the enforcement of the statutory provision pursuant to Public Utilities Code - PUC 399.21. (a) (2), Each renewable energy credit shall be counted only once for compliance with the renewables portfolio standard of this state or any other state, or for verifying retail product claims in this state or any other state.

Pursuant to SB 350, De Leon. Clean Energy and Pollution Reduction Act of 2015, the Energy Commission shall ensure that the tracking system established pursuant to subdivision (c) of Section 399.25, is operational, is capable of independently verifying that electricity earning the credit is generated by an eligible renewable energy resource, and can ensure that renewable energy credits shall not be double counted by any seller of electricity within the service territory of the WECC.

Pursuant to Public Utilities Code - PUC 399.21. (a) (1), The commission and the Energy Commission shall ensure that the tracking system established pursuant to subdivision (c) of Section 399.25, is operational, is capable of independently verifying that electricity earning the credit is generated by an eligible renewable energy resource, and can ensure that renewable energy credits shall not be double counted by any seller of electricity within the service territory of the WECC.

Pursuant to Public Utilities Code - PUC 399.21. (a) (2), Each renewable energy credit shall be counted only once for compliance with the renewables portfolio standard of this state or any other state, or for verifying retail product claims in this state or any other state.

Pursuant to Public Utilities Code - PUC 399.30. (n), The Energy Commission shall adopt regulations specifying procedures for enforcement of this article. The regulations shall include a public process under which the Energy Commission may issue a notice of violation and correction against a local publicly owned electric utility for failure to comply with this article, and for referral of violations to the State Air Resources Board for penalties pursuant to subdivision (o).

A method to enforce that each renewable energy credit shall be counted only once for compliance with the renewables portfolio standard of this state or any other state, or for verifying retail product claims in this state or any other state is required.

From planning of procurement to retirement of renewable energy credits, multiple counting of renewable energy credits shall be prevented.

For an accounting system to ensure that no multiple counting exists, all records in the accounting system must be ensured to not be counted multiple times for compliance with the renewables portfolio standard of this state or any other state, or for verifying retail product claims in this state or any other state.

Independent verification must be ensured. Any multiple counting of renewable energy credits shall be removed from the accounting system and renewable energy credit balances shall be recalculated.

Time does not confirm a void act.

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