

DOCKETED

Docket Number:	16-RPS-03
Project Title:	Amendments to Regulations Specifying Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities
TN #:	231485
Document Title:	Steve Uhler Comments - Exclude, Subtract, and Monetize
Description:	N/A
Filer:	System
Organization:	Steve Uhler
Submitter Role:	Other Interested Person
Submission Date:	1/13/2020 9:58:56 PM
Docketed Date:	1/14/2020

*Comment Received From: Steve Uhler
Submitted On: 1/13/2020
Docket Number: 16-RPS-03*

RPS-16-03 Exclude, Subtract, and Monetize

RPS-16-03 Exclude, Subtract, and Monetize

Exclude means to keep something out.

Subtract means to take something away.

Monetize means convert into or express in the form of currency.

No math is required to exclude. If you need to know the amount that were excluded, you count the excluded items. Exclusion never causes another amount to be less than zero. You don't have prohibit any amounts that are less than zero.

To subtract, you first identify a amount to take away, then you use math to subtract the amount from another amount. Subtraction can result in amounts less than zero if less than zero amounts are not prohibited.

You can monetize renewable energy credits by gaining new customers by telling them you have been using renewable energy for a length of time. Each new customer is additional revenue. You can also monetize renewable energy credits by meeting the requirements of Title 24 10-115 and selling new homes. These are prohibited pursuant to Public Utilities Code - PUC 399.30. (c) (4), if the local publicly owned electric utility excludes from its total retail sales the kilowatthours generated.

Public Utilities Code - PUC 399.30. (c) (4) allows kilowatthours to be excluded from retail sales. Subtraction would require the kilowatthours to be sold as part of retail sales to ensure that subtraction does not result in amounts less than zero.

Pursuant to Public Utilities Code - PUC 399.21. (a) (2) requirements 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. This requires the Energy Commission to confirm if kilowatthours were sold as a retail sale or for verifying retail product claims such as voluntary green pricing or shared renewable generation programs.

Perhaps the Energy Commission has overlooked the lack of Title 20 regulations for enforcing Public Utilities Code - PUC 399.21. (a) (2) pursuant to Public Utilities Code - PUC 399.21. (a) (1)?

There is a thread that runs through Public Utilities Code - PUC 399.30. (c) (4) and Public Utilities Code - PUC 399.21. (a) (2). That thread is that a renewable energy credit shall not be

used for compliance with procurement requirements if it is from kilowatthours that are excluded from retail sales or used for verifying retail product claims such as voluntary green pricing or shared renewable generation programs included as retail sales of kilowatthours.

Attached is a short video clip describing the pricing structure of SMUD SolarShares, a voluntary green pricing or shared renewable generation program. In order to reduce enforcement costs, the Energy Commission should write regulations for the voluntary green pricing or shared renewable generation programs that are allowed to be used pursuant to Public Utilities Code - PUC 399.30. (c) (4) to ensure not double counting of credits under Title 20 and Title 24.

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Additional submitted attachment is included below.

