

DOCKETED

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Comment Received From: Steve Uhler
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BSTD-19-08 SMUD to guarantee solar output

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Dear Energy Commission Commissioners,

How will the Energy Commission ensure, with respect to rates and charges, that ratepayers that do not receive service pursuant to the SolarShares tariff are indifferent to whether a ratepayer receives service pursuant to the SolarShares tariff for the 20 year period required by the 2019 Building Standards?

How will the Energy Commission ensure, the allocation adjustments required to guarantee solar output, will not reduce renewable energy that other ratepayers would otherwise receive for the 20 year period required by the 2019 Building Standards?

SMUD will retire RECs in the Western Renewable Energy Generation Information system (WREGIS) on the behalf of program participants, making these RECs unavailable to the Regional Portfolio Standard (RPS) market.

SMUD will retire allowances commensurate with the allocated solar generation via participation in the Air Resources Board's (ARB's) Voluntary Renewable Energy program (VRE). The VRE program allows purchasers of voluntary renewable products to back up claims of GHG reductions within a capped system without the expense of purchasing and retiring allowances. This goes beyond the rooftop benefit of fewer GHG emissions from the electric sector (the Neighborhood SolarShares program matches and exceeds this benefit) to demonstratable GHG reductions overall in the Cap and Trade structure. With rooftop solar, while GHG reductions in the electric sector are likely, there is no guarantee that allowances will be retired, and the Cap and Trade program implies that an equivalent amount of GHG emissions will be allowed elsewhere under the Cap without such retirement.

The Voluntary Renewable Electricity (VRE) Program allows purchasers of eligible voluntary renewable electricity to request retirement of allowances, through the retirement of renewable energy credits, on their behalf under the Cap-and-Trade Program. The VRE Program supports purchases of renewable electricity and renewable energy credits (RECs) that are not mandated by the Renewables Portfolio Standard and provides a mechanism for the recognition of voluntary purchases of renewable electricity or RECs in the Cap-and-Trade Program. The Cap-and-Trade Regulation specifies a percentage of vintage 2013-2020 allowances to be set aside each year into a Voluntary Renewable Electricity Reserve Account for the VRE Program.

Retiring allowances commensurate with the allocated solar generation via participation in the Air Resources Board's (ARB's) Voluntary Renewable Energy program (VRE) requires the retirement of renewable energy credits. If these are the same mandated renewable energy credits retired in

the Western Renewable Energy Generation Information system for the Renewable Portfolio Standard program pursuant to PUC 399.30 (c) (4), this appears to be double-counting renewable energy credits.

Is claiming of credit for kilowatthours in more than one program double-counting?

How will the Energy Commission ensure no double counting of credit for solar generation allocated to each participant SolarShares tariff for the 20 year period required by the 2019 Building Standards?

How will the Energy Commission recover its costs of monitoring SMUD's SolarShares program that would otherwise be monitored by the program participant pursuant to JA11.5 for the 20 year period required by the 2019 Building Standards?

Please watch the attached video on SMUD ratemaking methods. Please consider the effect on ratepayers that do not receive service pursuant to the SolarShares tariff.

I asked that the Commissioners not approve SMUD's application without docketed written answers to the questions, thereby providing the commission with the most comprehensive record feasible in the proceeding.

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Additional submitted attachment is included below.

