

**DOCKETED**

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## **DECARB-20-01 You are what you eat**

DECARB-20-01 You are what you eat

One should consider the actual electricity sources and losses when working to remove carbon from one's footprint.

Programs such as Public Utilities Code ARTICLE 16. California Renewables Portfolio Standard Program [399.11 - 399.33] and ARTICLE 14. Disclosure of Sources of Electrical Generation [398.1 - 398.5] and the associated Title 20 regulations allow resource shuffling.

Resource shuffling will hide carbon from the end user and falsely encourage electrification.

In California there are eight balancing authorities:

Balancing Authority of Northern California (BANC)  
California Independent System Operator (CAISO)  
Imperial Irrigation District (IID)  
Los Angeles Department of Water and Power (LADWP)  
PacifiCorp-West  
NV Energy  
Turlock Irrigation District (TID)  
Western Area Lower Colorado (WALC)

The below links show EIA Balancing Authority hourly data that has been charted to animate each day, showing carbon content for local (within the balancing authority's control) electricity sources.

EIA data charted for all of California  
<https://wwmpd.com/energy/iq/cal/index.html>

EIA data charted for Balancing Authority of Northern California  
<https://wwmpd.com/energy/iq/banc/index.html>

EIA data charted for California Independent System Operator  
<https://wwmpd.com/energy/iq/ciso/index.html>

EIA data charted for Imperial Irrigation District  
<https://wwmpd.com/energy/iq/iid/index.html>

EIA data charted for Los Angeles Department of Water and Power  
<https://wwmpd.com/energy/iq/ldwp/index.html>

EIA data charted for PacifiCorp West  
<https://wwmpd.com/energy/iq/pacw/index.html>

EIA data charted for Nevada Power Company  
<https://wwmpd.com/energy/iq/nevp/index.html>

EIA data charted for Turlock Irrigation District  
<https://wwmpd.com/energy/iq/tidc/index.html>

EIA data charted for Western Area Power Administration - Desert Southwest Region  
<https://wwmpd.com/energy/iq/walc/20200724.html>

Committed carbon is that which due to early conversion to electricity and energy conversion losses, will add to the greenhouse gases, that would not happen if the fossil fuel were used to directly produce the necessary heat for the end user.

Perhaps the below link shows a hour on one of the lowest carbon days.

<https://wwmpd.com/energy/iq/ciso/20200628.html>

At 14:00, the Carbon was 9.92% for locally controlled generation.

How many years before the above listed hour is the normal state of decarbonation for the whole day?

What data is the Energy Commission using to determine the amount of committed carbon that should be allowed?

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