

**DOCKETED**

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| <b>Docket Number:</b>   | 16-RPS-03   |
| <b>Project Title:</b>   | Amendments to Regulations Specifying Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities |
| <b>TN #:</b>            | 234567  |
| <b>Document Title:</b>  | SFPUC Comments on CEC 2nd 15-Day Package - ATTACHMENT 1   |
| <b>Description:</b>     | N/A   |
| <b>Filer:</b>           | System  |
| <b>Organization:</b>    | SFPUC/James Hendry  |
| <b>Submitter Role:</b>  | Public Agency   |
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*Comment Received From: James Hendry  
Submitted On: 9/2/2020  
Docket Number: 16-RPS-03*

## **SFPUC Comments on CEC 2nd 15-Day Package - ATTACHMENT 1**

This is ATTACHMENT 1 to the SFPUC Comments on the CEC's 2nd 15-Day Comment Package

*Additional submitted attachment is included below.*

SFPUC Comments on CEC RPS Rulemaking Submitted September 2, 2020

DOCKET: 16-RPS-03

**ATTACHMENT 1**

**ECONOMIC BENEFITS OF PARTICIPATING IN CARB’s LCFS PROGRAM**

(Comparison of CEC and SFPUC interpretation of PU Code Sec. 399.30(c)(4) Requirements for LCFS Participation)

|                             | Renewable Energy Credits (RECs) |     |              |      | LCFS  |         |         | Net Revenue Calculation |                 |                             | Results                       |        |                  |
|-----------------------------|---------------------------------|-----|--------------|------|-------|---------|---------|-------------------------|-----------------|-----------------------------|-------------------------------|--------|------------------|
|                             | MWh                             | RPS | Green Tariff | LCFS | TOTAL | Credits | Value   | \$/MWh                  | Additional RECs | Increased Green Tariff Cost | Increased Revenue to Customer |        |                  |
| <b>CURRENT (Baseline)</b>   |                                 | 33  | 0            | 0    | 33    | 25      | \$5,000 | \$50                    | BASELINE        |                             |                               |        |                  |
| <b>GREEN TARIFF (SFPUC)</b> |                                 | 0   | 100          |      | 100   | 35      | \$7,000 | \$70                    | 67              | \$1,005                     | \$2,000                       | \$995  | GAIN TO CUSTOMER |
| <b>GREEN TARIFF (CEC)</b>   |                                 | 0   | 100          | 100  | 200   | 35      | \$7,000 | \$70                    | 167             | \$2,505                     | \$2,000                       | -\$505 | LOSS TO CUSTOMER |

ASSUMPTIONS

|  | Modeled | Current Price |
|--|---------|---------------|
| REC PRICE                                  | \$15    | \$16-18       |
| LCFS Credits per 100 MWh *CA Grid Average) | 25      |               |
| LCFS Credits per 100 MWh (green tariff)    | 35      |               |
| LCFS Credit Value                          | \$200   | \$197-205     |

