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Submitted On: 12/21/2021
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Silicon Valley Clean Energy Comments to Proposed Regulatory Changes to the Power Source Disclosure Program

Additional submitted attachment is included below.

SILICON VALLEY CLEAN ENERGY

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December 21, 2021

California Energy
Commission Docket Office,
MS-4
Re: Docket No. 21-OIR-01
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Comments of Silicon Valley Clean Energy to the California Energy Commission Docket No. 21-OIR-01: Proposed Regulatory Changes to the Power Source Disclosure Program

Dear Commissioners:

Silicon Valley Clean Energy (SVCE) appreciates the opportunity to submit comments to the California Energy Commission (CEC or Commission) regarding the Proposed Changes to the Power Source Disclosure Program Regulations.

SVCE is a community choice aggregator (CCA) serving thirteen communities in the San Francisco Bay Area. SVCE's mission is to reduce dependence on fossil fuels by providing carbon-free, affordable and reliable electricity and innovative programs within the community.

SVCE submits the following comments for consideration by the CEC.

1. <u>The Commission should provide additional opportunities to modify existing accounting methodologies</u>

Current accounting methodologies for the Power Source Disclosure (PSD) Program are misaligned with similar reporting requirements by the California Public Utilities Commission's (CPUC) Renewables Portfolio Standard (RPS) Program. Specifically, accounting methodologies in the PSD template calculations starting for reporting year 2020, reduce over procurement of "specified" generation to meet reported retail sales megawatt hour figures, and allow specified generation of natural gas resources to be selected first for reduction to meet retail sales. If natural gas is not present on a Load Serving Entity's (LSE) PSD report, all other reported generation is reduced to meet total reported retail sales MWh. This results in inaccurate reporting of energy purchased by LSEs.

Many CCAs are transitioning to 100% carbon-free resources in advance of state goals by procuring specified renewable and carbon-free resources, in lieu of natural gas resources. Many LSEs procure specified renewable and carbon-free resources above retail sales volumes to account for system losses and ensure grid reliability. The accounting methodology calculation currently present in PSD template does not truly reflect an LSE's specified generation procurement to meet retail load.

Specifically, SVCE's 2020 PSD template showed 42.5% renewables to meet load. However, SVCE's 2020 Renewable Portfolio Standard (RPS) Report to the CPUC reflected a more accurate 49.5% procurement of renewables to meet retail load. In short, there is a disconnect between how an LSE reports specified generation to meet retail load to the CEC and how it is reported to the CPUC in the annual RPS report.

Because current PSD accounting methodologies do not allow for accurate PSD reporting of LSE procurement to meet load, SVCE proposes modifications of current PSD accounting methodology to ensure it accurately reflects LSE efforts towards meeting California's clean energy initiatives and is better aligned with similar reporting in the CPUC's RPS Procurement Plans. To that end, SVCE urges that this docket expand its scope to consider modifications to the Regulation Governing the Power Source Disclosure Program document, Docket # 20-PSDP-01, effective May 4, 2020 and this docket consider modifications to "Accounting Methodology" Section 1393 (a) (6).

SVCE thanks the CEC for consideration of the above comments and commends your leadership. If you should have any questions, please contact SVCE's Director of Power Resources, Monica Padilla at monica.padilla@svcleanenergy.org.

SVCE looks forward to a continued collaboration with the CEC and other stakeholders in this docket.

Sincerely,

/s/Melicia Charles

Director of Legislative and Regulatory Policy,
Silicon Valley Clean Energy