

DOCKETED

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**RPS-2021-01 CEC-300-2022-012-SF-REV methodology guideline
and 21-RPS-02**

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Additional submitted attachment is included below.

RPS-2021-01 CEC-300-2022-012-SF-REV methodology guideline and 21-RPS-02

CEC-300-2022-012-SF-REV does not reflect statute and regulation.

Perhaps the CEC-300-2022-012-SF-REV methodology report is a guideline that should be considered under the proceeding Renewables Portfolio Standard 10th Edition Guidebook Update under docket 21-RPS-02?

CEC-300-2022-012-SF-REV has a number of uncertain statements.

Uncertain Statement on page 7: Footnote "8 This REC reflects the requirements for a renewable energy credit under Public Utilities Code section 399.12, subdivision (h)."

WREGIS does not track ownership of generation environmental attributes.

How does a WREGIS created renewable energy credit reflect PUC 399.12(h) certificate of proof associated with the generation of electricity from an eligible renewable energy resource, issued through the accounting system established by the Energy Commission (CEC)?

WREGIS does not track ownership of generation of electricity from an eligible renewable energy resource to ensure that electricity generated by an eligible renewable energy resource is counted only once.

The CEC implemented accounting system to ensure that electricity generated by an eligible renewable energy resource is counted only once pursuant to PUC 399.25(b) is not reflected by a WREGIS renewable energy credit that does not track ownership of electricity generated by an eligible renewable energy resource as the methodology report claims.

Uncertain Statement on page 9: "Generation Eligibility Analysis As stated above, WREGIS issues and tracks RECs representing renewable energy generation for the region covered by the WECC. WREGIS was designed to ensure that generation is accurately reported, recorded, and counted only once for any regulatory or voluntary program. As such, CEC staff relies on the generation information as reported to WREGIS."

See uncertain statement for page 7 key point WREGIS does not track ownership of environmental attributes.

Uncertain Statement on page 17: "Contract Review and Matching"

The methodology report "Contract Review and Matching" section does not explain how a retail customer can submit procurement contracts or receipts for the purchase of electricity generated by an eligible renewable energy resource for CEC's review.

Please add information to the methodology report explaining how the public can submit ownership claims.

Uncertain Statements on page 14: "The CEC collaborates with CEC staff from other states within the WECC and can confirm data as needed and based on the reporting requirements and availability of data in each state." and "In addition, CEC staff coordinates with other state agencies"

Please explain the methodology report statement **"The CEC collaborates with CEC staff from other states within the WECC and can confirm data as needed and based on the reporting requirements and availability of data in each state."** found on page 14 under **"Coordinating with Other State and Voluntary Programs"**.

Does the CEC have staff in other states?

Please explain **"In addition, CEC staff coordinates with other state agencies"** found on page 14 under **"Coordinating with Other State and Voluntary Programs"**.

What other state agencies track ownership of electricity generated by an eligible renewable energy resource?

How do these tracking methods ensure that electricity generated by an eligible renewable energy resource is counted only once?

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