

DOCKETED

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RPS-2021-01 Balancing SMUD's RPS compliance account, do not approve staff verification

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There is not enough detail in the verification report (PDF) and summary (XLSX) to balance SMUD's RPS compliance account.

Verification for SMUD is not complete, do not approve staff verification.

Steve Uhler
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Additional submitted attachment is included below.

RPS-2021-01 Balancing SMUD's RPS compliance account, do not approve staff verification

There is not enough detail in the verification report (PDF) and summary (XLSX) to balance SMUD's RPS compliance account.

Links to report and summary:

Report: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=252993>

Summary: <https://www.energy.ca.gov/filebrowser/download/5831>

"Portfolio content category" (PCC) refers to one of three categories (PCC 1, PCC 2, and PCC 3) of electricity products procured from an eligible renewable energy resource, as specified in section 3203.

The reported reduction in total retail sales to account for sales associated with a green pricing program does not identify the source of the Renewable Energy Credits (REC). These RECs are required to be Product Content Category 1 (PCC 1). Any exclusion shall be limited to electricity products that do not meet the portfolio content criteria set forth in paragraph (2) or (3) of subdivision (b) of Section 399.16.

The report and summary do not identify RECs for reduction in total retail sales, and Product Content Categories are not identified in the summary for any of the RECs claimed.

The Energy Commission's accounting system does not live up to the U.S. Environmental Protection Agency (EPA), and Center for Resource Solutions (CRS) view of how RECs are to be used and accounted.

EPA: https://www.youtube.com/watch?v=_12VYXms6-c

CRS: <https://www.youtube.com/watch?v=opJMrzNauFO>

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