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RPS-2021-01 How are Green Pricing Program RECs certified

RPS-2021-01 How are Green Pricing Program RECs certified?

Beginning January 1, 2014, in calculating the procurement requirements under RPS, a local publicly owned electric utility may exclude from its total retail sales the kilowatthours generated by an eligible renewable energy resource that is credited to a participating customer pursuant to a voluntary green pricing or shared renewable generation program. 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. Any renewable energy credits associated with electricity credited to a participating customer shall not be used for compliance with procurement requirements under this article, shall be retired on behalf of the participating customer, and shall not be further sold, transferred, or otherwise monetized for any purpose. To the extent possible for generation that is excluded from retail sales under this subdivision, a local publicly owned electric utility shall seek to procure those eligible renewable energy resources that are located in reasonable proximity to program participants.

How are Green Pricing Program RECs certified for 100 percent solar voluntary green pricing or shared renewable generation programs?

Example, a 100 percent solar voluntary green pricing or shared renewable generation program that does not have storage will require unbundled RECs to claim 100 percent renewable energy use. The participating customer that uses the bulk of their electricity when the sun is not shining will require unbundled RECs in order to claim 100 percent renewable energy use. These unbundled RECs are not allowed to be double counted.

Are these unbundled RECs identified as ineligible for exclusion from retail sales and RPS compliance?

Please provide a listing identifying all voluntary green pricing or shared renewable generation programs' unbundled RECs. The list should identify any unbundled RECs claimed for the Power Source Disclosure Program to ensure no REC is double counted pursuant to PUC 399.21(a)(1).

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