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California Energy Commission
Docket Number 21-OIR-01
715 P Street
Sacramento, CA 95814

RE: Proposed Changes to the Power Source Disclosure Program Regulations

Pacific Gas and Electric Company (PG&E) hereby submits these comments on the California Energy Commission's (CEC) *Proposed Changes (45-Day Language) to the Power Source Disclosure Program Regulations*, published on May 17, 2024 (Proposed PSD Regulations). PG&E believes that the Proposed PSD Regulations align well with the intent of Senate Bill (SB) 1158 and Assembly Bill (AB) 242. The Proposed PSD Regulations are intended to provide customer transparency, ensure accurate reporting for retail suppliers in California, and maintain environmental integrity of the electric sector's contribution to California's clean energy goals through hourly generation and emissions intensity reporting.

In these comments, PG&E requests minor modifications to the 2028 Consolidated Reporting Template to align with, and better implement, provisions of the Proposed PSD Regulations. PG&E also requests minor modification to the line-loss methodology in the Proposed PSD Regulations.

I. The 2028 Consolidated Reporting Template does not scale back the resources during hours of oversupply in the manner set forth in the Proposed PSD Regulations.

During periods of oversupply, the Proposed PSD Regulations remove excess supply in the following order until net specified purchases equal the loss-adjusted load:

1. Natural gas generation
2. All other resources proportionally, except coal

However, PG&E's examination of the 2028 Consolidated Reporting Template indicates that the spreadsheet does not scale back the resources in this order (i.e., natural gas generation first, etc.). The CEC may have intended to develop this functionality, but it is not yet reflected in the template. As such, PG&E recommends the hourly template be modified to scale back excess generation in the manner contemplated by the Proposed PSD Regulations.

II. Line-loss factors should be applied to generation rather than load.

Under the Proposed PSD Regulations, each retail supplier is assigned a single line-loss factor based on the latest demand forecast for their planning region. The Proposed PSD Regulations will then apply line-loss factors to hourly or annual load. This effectively increases the load by the loss factor percentage.

PG&E believes a more precise and equitable method would be to apply the line-loss factors to the generation source rather than to load. By applying line-losses to load rather than generation, the CEC is effectively equating out-of-state to in-state generation even though out-of-state generation has greater line-losses. This could skew the results to favor retail suppliers having a greater reliance on out-of-state generation. Although applying line-losses to load may be simpler to implement, PG&E recommends applying the line-loss factors to generation to ensure more accurate and transparent reporting.

PG&E appreciates the CEC's continued efforts throughout this proceeding to thoughtfully consider stakeholder input towards the development of the Proposed PSD Regulations. PG&E believes the transition to hourly reporting represents a key milestone in more accurate disclosure of electric generation and emissions intensity reporting.

Please reach out to me if you have any questions regarding PG&E's comments.

Sincerely,

Josh Harmon
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