

**DOCKETED**

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<b>Project Title:</b>	Rulemaking to Amend Regulations Governing the Power Source Disclosure Program
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Mr. Jordan Scavo  
Technical Lead, Power Source Disclosure  
Renewable Energy Division  
California Energy Commission  
715 P Street  
Sacramento, CA 95814-5512

**RE: Input Regarding the Accessibility of the California Energy Commission's Power Content Label**

Docket 21-OIR-01

August 22, 2024

Dear Mr. Scavo,

Peninsula Clean Energy Authority (PCE) submits this feedback to the California Energy Commission (Commission) to help inform the accessibility of the Power Content Label (PCL) for all customer demographics. PCE shares the Commission's commitment to improving the transparency and accessibility of the PCL.

As part of our efforts to ensure all customers can engage with important information regarding their energy supply, PCE obtained feedback from customers who utilize screen readers on how the PCL can be made more accessible. PCE submits the following recommendations for improvements of the PCL for your consideration.

- Present the PCL in text presentation (i.e. proper column headers and rows) to be useable by a screen reader.
- Avoid using .jpeg (or any other image files) as main tables, since image files are not optimally readable as optical character recognition (OCR) drops table headings and rows, making it difficult to associate different numbers and headers with tabular information.
- Use "plain text" to code the table to help the screen reader utility read up and down a column, as well as left to right across a row.
- Code headings so screen readers read the headings, not the heading numbers.
- Declare column headings so a screen reader can navigate to them for the customer to recognize which column the data is associated.
- If images are included in a table, code the information as a table so a person can navigate them. If that entry is an image, the screen reader will attempt to do an OCR and speak any of the text it can find.

We appreciate the opportunity to provide input to the Commission on the PCL. If you have any questions or additional information is required, please contact Jenna Sharp at [jsharp@peninsulacleanenergy.com](mailto:jsharp@peninsulacleanenergy.com).



Sincerely,

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