DOCKETED	
Docket Number:	21-OIR-01
Project Title:	Rulemaking to Amend Regulations Governing the Power Source Disclosure Program
TN #:	259416
Document Title:	Steve Uhler Comments - The portion of annual sales derived from unbundled renewable energy credits shall be included
Description:	N/A
Filer:	System
Organization:	Steve Uhler
Submitter Role:	Other Interested Person
Submission Date:	10/2/2024 2:07:01 AM
Docketed Date:	10/2/2024

Comment Received From: Steve Uhler

Submitted On: 10/2/2024 Docket Number: 21-OIR-01

OIR-2021-01 The portion of annual sales derived from unbundled renewable energy credits shall be included

OIR-2021-01 The portion of annual sales derived from unbundled renewable energy credits shall be included

The portion of annual sales derived from unbundled renewable energy credits needs to be specified by transactions that are traceable to specific retail customers.

The portion of annual sales derived from unbundled renewable energy credits shall be included in the disclosures in a format determined by the Energy Commission. This format is not included in the proposed regulations.

Steve Uhler sau@wwmpd.com

Additional submitted attachment is included below.

OIR-2021-01 The portion of annual sales derived from unbundled renewable energy credits shall be included

The portion of annual sales derived from unbundled renewable energy credits needs to be specified by transactions that are traceable to specific retail customers.

Only ten percent of total retail sales as a measure of unbundled renewable energy credits are eligible for RPS compliance.

Pursuant to ARTICLE 14. Disclosure of Sources of Electrical Generation [398.1 - 398.6] under 398.4(h)(7), the portion of annual sales derived from unbundled renewable energy credits shall be included in the disclosures in a format determined by the Energy Commission. A retail supplier may include additional information related to the sources of the unbundled renewable energy credits.

"Renewable energy credit" or "REC" means a 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 pursuant to Public Utilities Code section 399.25, that one unit of electricity was generated and delivered by an eligible renewable energy resource.

"Unbundled REC" means a REC from an eligible renewable energy resource that is not procured as part of the same agreement or ownership arrangement with the underlying energy from that eligible renewable energy resource; this includes a REC that was originally procured as a bundled product but was subsequently resold separately from the underlying energy.

Pursuant to ARTICLE 16. California Renewables Portfolio Standard Program [399.11 - 399.33] under 399.21(a)(1), renewable energy credits shall not be double counted by any seller of electricity within the service territory of the WECC.

Entities offering electric services in California shall not double count unbundled RECs; this includes a REC that was originally procured as a bundled product but was subsequently resold separately from the underlying energy.

The portion of annual sales derived from unbundled renewable energy credits shall be included in the disclosures in a format determined by the Energy Commission. This format is not included in the proposed regulations.

Steve Uhler sau@wwmpd.com