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PG&E Comments RE Scope of Draft Renewables Portfolio Standard Eligibility Guidebook, Tenth Edition

Additional submitted attachment is included below.



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1 November 2024

California Energy Commission
Docket Number 21-RPS-02
715 P Street
Sacramento, CA 95814

RE: Scope For Draft Renewables Portfolio Standard Eligibility Guidebook, Tenth Edition

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the Scope of the California Energy Commission's (CEC) draft 10th Edition of the RPS Eligibility Guidebook released on 18 October 2024. PG&E welcomes the CEC's efforts to update the RPS Eligibility Guidebook and looks forward to participating in the update process. PG&E generally concurs with CEC's proposed scope for the draft 10th Edition of the Guidebook, except for the two comments as detailed below.

1. Fuel Cells using renewable fuels, including hydrogen gas, should continue to be RPS eligible.

The proposed scoping plan introduces a change to Chapter 2.D. of the 9th Edition of the RPS Eligibility Guidebook which would remove the eligibility of fuel cells using "renewable fuels," which effectively eliminates the eligibility of fuel cells using hydrogen gas. This proposed RPS Guidebook change was introduced pursuant to Assembly Bill (AB) 1921 (Papan, 2024). PG&E believes the elimination of the eligibility of fuel cells using renewable fuels, including hydrogen gas, was not the intention of AB 1921. Therefore, PG&E recommends removing this change in RPS eligibility status for fuel cells using renewable fuels from the proposed scope of RPS Eligibility Guidebook changes.

2. Updating the naming convention for WREGIS Retirement Accounts for Load-Serving Entity Reports to include information on long-term/short-term REC claims would add unnecessary complexity to the REC retirement process.

The proposed scoping plan introduces a change to Chapter 7.A. of the 9th Edition of the RPS Guidebook which would update the naming convention for WREGIS Retirement Accounts for Load-Serving Entity Reports to include information on long-term/short-term REC claims. PG&E believes this change would add unnecessary complexity to the REC retirement process. Currently the distinction between long-term and short-term RECs is made downstream of WREGIS retirements via entries in the CPUC's RPS retirement report template. As such, any corrections to a retirement category between long-term and short-term can be readily made by changing the category on the RPS compliance report template.

However, if this distinction were to occur within the WREGIS retirement accounts then any changes would require a cumbersome and potentially unsuccessful request to WREGIS to move the retirement from one account to another. PG&E notes that Section 6.2.2 of the WREGIS Operating Rules states that

“customers cannot withdraw Certificates from a Retirement Account. The WREGIS Administrator has the ability, but not the obligation, to withdraw Certificates from an Organization’s Retirement Account that were placed there in error. If such a withdrawal is to be granted, the WREGIS Administrator will require documentation and may require consent from a program.”

Further complicating this process, WREGIS requires that the *“certificate(s) was retired within 12 months of the date of the withdrawal request”* and that the account holder *“can demonstrate that the Retired Certificate(s) has not yet been applied toward a state or provincial RPS, or other regulatory program or renewable obligation, nor has it been applied toward a renewable obligation under a voluntary program.”* Should miscategorizations of long-term and short-term categories occur, correcting these errors in WREGIS would be highly impractical and, in some instances under current WREGIS Operating Rules, impossible. Therefore, PG&E recommends removing this proposed change in the naming convention for WREGIS Retirement Accounts for Load-Serving Entity Reports from the proposed scope of RPS Eligibility Guidebook changes.

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PG&E appreciates the opportunity to comment on the scope of the draft 10th Edition of the RPS Eligibility Guidebook and looks forward to continuing to collaborate with the CEC. Please reach out to me if you have any questions.

Sincerely,

Josh Harmon
State Agency Relations