

DOCKETED

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California Energy Commission
Docket Number 21-OIR-01
715 P Street
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RE: Power Source Disclosure Program Regulations Updated 45-Day Language

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the California Energy Commission's (CEC) updated amendments to the Power Source Disclosure Regulations, ("45-Day Language"), which were released on October 4, 2024.

PG&E recommends clarifying *Section 1393 Annual Submission to the Energy Commission* to eliminate potential confusion on the timing for reporting loss-adjusted load and hourly generation data.

Section 1393 (a)(3) states "Beginning January 1, 2028, retail suppliers shall report the data identified in subdivision (b)(2)-(7) for each hour of the year." To eliminate potential confusion regarding which reporting year this provision applies to, PG&E recommends adding the words "For the reporting year" at the start of the sentence so it reads: "For the reporting year beginning January 1, 2028, retail suppliers shall report the data identified in subdivision (b)(2)-(7) for each hour of the year."

Similarly, section 1393 (b)(2) (B) states "Beginning January 1, 2026, retail suppliers shall report transmission and distribution losses associated with each procurement." To eliminate any potential confusion regarding which reporting year this provision applies to, PG&E recommends adding the words "For the reporting year" at the start of the sentence so it reads: "For the reporting year beginning January 1, 2026, retail suppliers shall report transmission and distribution losses associated with each procurement."

The above recommended changes would clarify that *hourly generation data reporting* begins with the power source disclosure report due on June 1, 2029. Similarly, the above recommendations would clarify that *the reporting of transmission and distribution losses associated with each procurement* begins with the power source disclosure report due on June 1, 2027. PG&E believes these clarifications align with the CEC's intent for the reporting dates of these new data requirements.

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PG&E appreciates this opportunity to further comment on the proposed Amendments to the Power Source Disclosure Regulations. Please reach out to me if you have any questions.

Sincerely,

Josh Harmon
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