

DOCKETED

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AVANGRID RENEWABLES COMMENTS ON CEC DOCKET 16-OIR-05

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Additional submitted attachment is included below.



Robin Smutny-Jones
California Policy and Regulation

October 30, 2017

California Energy Commission
Docket Unit, MS-4
Docket No. 16-OIR-05
1516 Ninth Street
Sacramento, CA 95814-5512

**RE: AVANGRID RENEWABLES COMMENTS ON ASSEMBLY BILL 1110 DRAFT PROPOSAL:
GREENHOUSE GAS INTENSITY AND POWER SOURCE DISCLOSURE REQUIREMENTS**

Submitted Electronically to the California Energy Commission in Docket 16-OIR-05

Avangrid Renewables hereby submits comments below regarding the California Energy Commission's (CEC) implementation of AB 1110 (Ting—Chapter 656, Statutes of 2016) requiring GHG emissions information on the Power Content Disclosure label.

Avangrid Renewables is the third largest generator of renewable energy in the US and is an active market participant in the California RPS market. Avangrid Renewables sells the output of numerous renewable generation projects to California retail sellers and has additional resources in development hoping to serve the California market.

Avangrid Renewables appreciates the work done to date by CEC staff and finds much of the proposal acceptable. We are concerned, however, that the Draft Proposal inaccurately conveys the GHG intensity of renewable products and is fundamentally contrary to the purpose of the Power Source Disclosure Content labeling program. Pursuant to comments below, Avangrid Renewables respectfully requests that the CEC amend the Draft Proposal to properly account for the GHG attributes contained in all renewable electricity products and that the GHG intensity calculation reflects the emission-free nature of energy associated with such products. Following are a couple of specific flaws we find with the Draft Proposal:

Undermines REC Definition

A REC under California law very clearly contains the environmental and GHG attributes, including the emissions profile associated with the REC.¹ To separate the emissions profile from

¹ (2) 'Renewable energy credit' includes all renewable and environmental attributes associated with the production of electricity from the eligible renewable energy resource, except for an emissions reduction credit issued pursuant to Section 40709 of the Health and Safety Code and any credits or payments associated with the reduction of solid waste and treatment benefits created by the utilization of biomass or biogas fuels." [See CPUC Decision 08-08-028].

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the associated REC directly violates definition of a REC and does not provide the REC's full benefit paid for by the California ratepayers.

Inconsistent with AB 1110 and Power Content Disclosure Program

Avangrid Renewables respectfully disagrees with TURN's assertion that the GHG intensity factor for the Power Content Disclosure program should be based off of the CARB's Mandatory Reporting Regulations (MRR) program. While it is correct that the RPS Program is different from the CARB's GHG tracking program, this does not change the fact that AB 1110 relates to the disclosure of GHG intensity of *products* (not hours or electron flow). The MRRs are designed to geographically track GHG emissions according to what is emitted within California and what is imported into California. AB 1110's purpose, on the other hand, is to describe the "GHG intensity" of electricity *products* sold or offered for sale in California. It is, therefore, not sensible to fit the square shape of CARB's GHG emissions "tracking" program within the round hole of a GHG intensity "product content" program.

Conclusion

In sum, Avangrid Renewables implores the CEC to respect and acknowledge the GHG emissions attributes of RECs under California law as requested above. These changes will ensure proper valuation of renewable energy in load serving entity portfolios and, thus, preserve the integrity of the RPS products and market.

Sincerely,

ROBIN SMUTNY-JONES
Director, California Policy and Regulation