

DOCKETED

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Comment Received From: Steve Uhler
Submitted On: 12/10/2017
Docket Number: 16-OIR-05

Double Counting RECs

2017.12.10

Double Counting RECs

Steve Uhler's further comment on implementation of AB1110 Power Content Labels.

Which comes first the environmental attributes of the electricity generation or the Renewable Energy Credit (REC)?

The environmental attributes of electricity generation are physical properties that must first exist before the Renewable Energy Credit can be created.

The Renewable Energy Credit can be produced by the owner of the environmental attributes of the electricity generation if the owner of property rights to the generation facility has obtained the proper certifications.

If someone has purchased the environmental attributes or the property rights of the electricity generation facility prior to generation of electricity, the Renewable Energy Credit can not be produced and transferred to someone else without double counting the environmental attributes of the electricity generation, if the original owner of the environmental attributes claimed the environmental attributes for their own use. This is explained in the Center for Resource Solutions Document dated October 7, 2010 Version 1.1, <https://www.green-e.org/docs/energy/Best%20Practices%20in%20Public%20Claims.pdf>.

Attached is a document LEG 2016-0747 that claims the standard for claiming environmental attributes for renewable energy that is considered double counting was changed sometime after 2013.

The advantage of the RPS laws appear to have been established for a public reason, therefore the RPS law cannot be contravened by private agreement.

It appears that those who try to certify Renewable Energy Credits still need the help of the Energy Commission in stopping the type of double counting of environmental attributes of carbon free energy as shown in the attached document LEG 2016-0747. This is a separate activity from the Power Content Label requirements.

Looking forward to the Energy Commission's validation of Renewable Energy Credits for the first RPS period. I will then know who also claimed the environmental attributes from my ownership of pro rata shares of SMUD SolarShares electricity generation facility for which I have been given the right to make claim to environmental attributes as identified in the attached document LEG 2016-0747 through the Power Content Label and Solar window sticker.

ever onward,
Steve Uhler
sau@wwmpd.com

Additional submitted attachment is included below.



Via Electronic Delivery: Steve Uhler <sau@wwmpd.com>

Re: Public Records Act Request dated September 20, 2016
PRA No. LEG-2016-0747

Mr. Steve Uhler :

SMUD acknowledges receipt of your California Public Records Act (PRA) request, received on October 20, 2016. In brief, you request the availability of writings showing the ownership of all renewable and environmental attributes associated with the production of electricity from the eligible renewable energy resource, related to purchase and SMUD's billing under account 527100, for SolarShares. A copy of your PRA request is attached.

This letter constitutes a response under the PRA. SMUD has not identified any records in response to your PRA request¹. Your participation in SolarShares from the years 2008 to 2013 was at a time before we began associating the solar RECs with customer usage and retiring them on participant's behalf. The program was originally designed to use the SolarShares generation as part of our RPS portfolio of resources.

When we created SolarShares, it was a one of a kind program and the best practices regarding REC treatment had not yet been established. We now associate the customer's usage with generation and retire the RECs on the customer's behalf, but this was not the case during your participation.

If you have any questions, I may be reached directly at (916) 732-5603. If I am out of the office, please call (916) 732-6119 for a delegate to assist you.

Sincerely,

A handwritten signature in blue ink that reads "Marilyn King".

Marilyn King
Paralegal

From: [Steve Uhler](#)
To: [PRA](#)
Subject: What is the availability of writings showing the ownership of all renewable and environmental attributes?
Date: Thursday, October 20, 2016 2:57:34 AM
Attachments: [PCLsolarShares.png](#)
[PowerByCleanSolarEnergy.png](#)

.....**CAUTION EXTERNAL SENDER:** Do not open links/attachments if uncertain about the sender.....

2016.10.20

Dear pra@smud.org,


What is the availability of writings showing the ownership of all renewable and environmental attributes associated with the production of electricity from the eligible renewable energy resource, related to my purchase and SMUD's billing under account 527100, for SolarShares with claimed power content as shown in the attached power content label and window decal, allowing me the right to make claim I have used renewable energy for my voluntary contributions that is consistent with California's regulatory policy and the policy of voluntary offset markets?

thanks,

Steve Uhler

Energy Facts SolarShares Solar Power Project	
Solar Farm Size	1M _W ac (17,172 panels)
Location	Sacramento County, CA
Fuel Source	Sun
Type of Energy	Clean and Renewable
Number of Homes Served	600-1,200
Land Used	8.5 acres
Greenhouse Gas Emissions	None
Annual Avoided Consumption	3,139 barrels of oil

Using renewable energy is proven to slow the pace of climate change and provide a healthy environment for our community.



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**This home is powered by
clean solar energy.**



SMUD

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