DOCKETED		
Docket Number:	16-OIR-05	
<b>Project Title:</b>	Power Source Disclosure - AB 1110 Implementation Rulemaking	
TN #:	221930	
<b>Document Title:</b>	Double Counting RECs	
Description:	N/A	
Filer:	System	
Organization:	SMUD/Steve Uhler	
Submitter Role:	Public	
Submission Date:	12/10/2017 2:33:20 PM	
Docketed Date:	12/10/2017	

Comment Received From: Steve Uhler Submitted On: 12/10/2017 Docket Number: 16-0IR-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 request<sup>1</sup> 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,

Marely King

Marilyn King Paralegal

From:	Steve Uhler	
То:	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	
	PowerdByCleanSolarEnergy.png	

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

## 2016.10.20

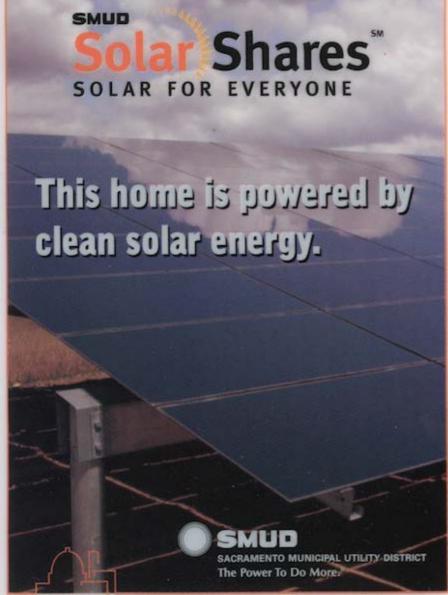
## Dear pra@smud.org,

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 Location	IMWAC (17,172 panels) Sacramento County, CA		
Fuel Source Type of Energy Number of Homes Served	Sun Clean and Renewable 600-1,200		
Land Used Greenhouse Gas Emissions Annual Avoided Consumption	8.5 acres None 3,139 barrels of oil		
Solar	rgy is proven to slow the ge and provide a healthy community. Shares EVERYONE		



<sup>6</sup> A registered service mark of Sacramento Municipal Utility District. 07/08-0951\_4.375x6