

DOCKETED

Docket Number:	16-OIR-05
Project Title:	Power Source Disclosure - AB 1110 Implementation Rulemaking
TN #:	222426
Document Title:	Steve Uhler Comments WYSIWYG
Description:	N/A
Filer:	System
Organization:	Steve Uhler
Submitter Role:	Public
Submission Date:	2/4/2018 8:15:12 PM
Docketed Date:	2/4/2018

Comment Received From: Steve Uhler

Submitted On: 2/4/2018

Docket Number: 16-OIR-05

WYSIWYG

WYSIWYG

What You See Is What You Get.

For the information to be timely, it has to be useful.

I believe the customer should get actionable information, not information that disappoints without recourse of value.

The need is for information, not to feel confident. Confidence will come with truth and the shunning of falsehoods.

One can be made to feel confident by things like <https://www.c-span.org/video/?c4502670/buy-solar-shares-true-video>. Did SMUD purchase what the consumer "pays for"? Energy Commission staff have told me SMUD did not purchase the solar fields. How is the portion of energy that comes from rooftop solar that the home owner uses treated when it comes to RPS? Did SMUD SolarShares follow all of the Net Metering laws? How do the State's climate goals benefit from these confident reducing actions.

The Energy Commission's Power Content Label (PCL) is fundamentally flawed.

By law, all retail suppliers must display a label in product-specific written promotional materials, and must send their customers annual label updates. The retail supplier must validate these claims at the end of the year through an independent audit. In this way, consumers can feel confident that retailers purchase what the consumer "pays for."

As found on <http://energy.ca.gov/pcl/background.html>

The use of the word "feel" is the type of word one uses when one wishes to make a claim but does not want any blame. Does the Energy Commission believe the Legislature merely wants the public to "feel" confident that retailers purchase what the consumer "pays for"?

ARTICLE 14. Disclosure of Sources of Electrical Generation [398.1 - 398.5] does not contain the word "feel". It does contain the words reliable, accurate, timely, and consistent.

Is it enough to just "feel" there is carbon free energy nearby and brought to SMUD service territory to reduce energy related climate change in Sacramento County where greenhouse gases for electricity generation has more than doubled since 2005? The largest increase in California, based on Energy Commission QFER data.

See http://ugemrp.com/1066/0001/questions/20170624/co2_i_2005_2016.htm

2014 SMUD customer owners paid rates that were increased in part to get more renewables and got 27% eligible renewables. This is a 2% increase from 2013.

2016 rates were increased in part to get more renewables but got less at 20% eligible renewables.

This reduction in renewables happened while renewable costs were going down. This SMUD video clip talks of

budget savings from lower renewables costs.

https://youtu.be/uhZp_p5Z4AY?t=159s

The link below is SMUD's 2014 PCL that SMUD must display such a label in product-specific written promotional materials, and must send their customers annual label updates. It claims 27% Eligible Renewable. This is the information from which consumers are to "feel" confident that SMUD will purchase what the consumer "pays for" in the year 2016.

[http://www.energy.ca.gov/pcl/labels/2014_labels/all_labels/Sacramento_Municipal_Utility_District_\(SMUD\).pdf](http://www.energy.ca.gov/pcl/labels/2014_labels/all_labels/Sacramento_Municipal_Utility_District_(SMUD).pdf)

Here is the proof the SMUD customer owners expecting 27% or better are misled that they should get 27%.

http://www.energy.ca.gov/pcl/labels/2016_labels/Sacramento_Municipal_Utility_District.pdf

The label claims 20% Eligible Renewables, yet SMUD customer owners were only told of the ability to get 27% Eligible Renewables.

Is a pig in a poke the best the Energy Commission can do when it comes to informing the energy customer?

Will SMUD customer owners be made whole in the 27% SMUD advertised eligible renewables in the 2014 power content label? If not, then no actionable information is conveyed in the label. SMUD Customers has to accept what they got with no recourse of value.

Why do any of this if customers don't get a label sent to them as the law requires?

One section of statute that AB1110 amended 398.1 adds the associated emissions of greenhouse gases, that are used to provide electric services.

<http://leginfo.legislature.ca.gov/faces/displayCodeAndBill.xhtml?sectionNum=398.1.&billVersionSectionId=185810&lawCode=PUC>

The Legislature finds and declares that there is a need for reliable, accurate, timely, and consistent information regarding fuel sources for electric generation offered for retail sale in California.

For the Energy Commission's PCL to be reliable, accurate, timely, consistent, the retail energy consumer must be informed before the production of the greenhouse gases to cause a change in behavior to prevent the greenhouse gases.

In SMUD's case there is audited proof they did not get what they were told. Please explain why the Energy Commission has accepted an audit that SMUD claimed only retail sales of renewables when the Energy Commission has been told of the renewables that were claimed were not sold at retail. SolarShares was not the purchase of energy, it was the rental of the equipment so one could produce their own just like rooftop solar.

My prior comment explains SMUD claims about SolarShares sources and double counting.

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=216582>
<https://efiling.energy.ca.gov/GetDocument.aspx?tn=221930>

Is it true that best practices preventing double counting regarding REC treatment had not been established until 2013

as SMUD says in claiming RPS eligible REC from my purchase of SolarShares equipment rental?

For a Energy Commission's AB1110 Power Content Label to have currency, counterfeit Power Source Disclosure has to be prohibited and policed with recourse of value.

I want to know if I am lying about being solar powered by displaying a solar powered sign provided by SMUD, not unlike the one in the Energy Commission's lobby claiming 100% renewable powered with a picture of a wind turbine.

Is the Energy Commission aware that the commission own data lists SMUD's nearby Solano Wind power as being sold to PG&E?

See http://energy.ca.gov/almanac/power_plant_data/Power_Plants.xlsx

Are the RPS eligible RECs being double counted by the Energy Commission displaying the sign provided by SMUD, or is it inconsistent data on the Energy Commission part?

SMUD's Tim Tutt says "SMUD also has a situation where we have a lot of renewable contracts where the power isn't delivered to our service territory". The people of Sacramento County need to know that they live in a desert when it come to renewable energy.

See <https://efiling.energy.ca.gov/GetDocument.aspx?tn=220318>

The Energy Commission must enforce the requirement that the retail seller sends printed PCLs to their customers.

The Energy Commission says, by law, all retail suppliers must send their customers annual label updates. The retail supplier must validate these claims at the end of the year through an independent audit.

Does SMUD claim they sent PCLs to all of their customer owners? Did the Energy Commission ask after hearing customers did not get Power Content Labels? If so, has the Energy Commission received validation of SMUD's claim that they sent PCLs to all of their customer owners?

If the Energy Commission has not validated that SMUD customer owners consistently received a PCL then the PCL will not be a consistent and reliable method of meeting the need for accurate, timely information regarding fuel sources for electric generation offered for retail sale in California.

The Energy Commission's AB1110 PCL does little to correct the type of things that can mislead the energy consumer, as spoke of in the twenty year old report "Green Buyers Beware" warning consumers when buying "Green" energy products

<https://www.citizen.org/sites/default/files/greenbuy.pdf>

I wonder what the author of "Green Buyers Beware" has to say about this SMUD video clip where a SMUD executive appears to want to sell a "green" product for a additional charge. The costs are already captured in their rate system. This being done just to get more revenue for a not for profit monopoly, believing the customer gets what they want. No additional reductions of greenhouse gases will be achieved.

<https://youtu.be/d9DSodlnbqw>

I heard the Energy Commission,s building is now powered in part by SMUD SolarShares.

<https://www.dgs.ca.gov/dgs/Newsroom/tabid/72/ArticleID/205/State-Office-Buildings-Go-Solar-in-2018.aspx>

Please show us the PCLs that go with the Department of General Services (DGS) purchases of SMUD Greenergy and SolarShares. If you don't have these PCLs, use the proposed AB1110 PCL system to produce PCLs and then have them independently audited.

Test your prototype AB1110 PCL system through the building of PCLs for the DGS purchases of energy. I believe you will find flaws in the system and the purchases reported, report the flaws and correct them. I will review the flaws the Energy Commission reports and see if they match the ones I have found.

The Energy Commission appears to think of itself as a leader in the energy field. The leader should be one who makes use of modern methods of informing the public as to energy and climate and power content disclosure.

Below is a example of Power Source Disclosure you need to better to be considered a leader in the energy field.

It is called GridCarbon.

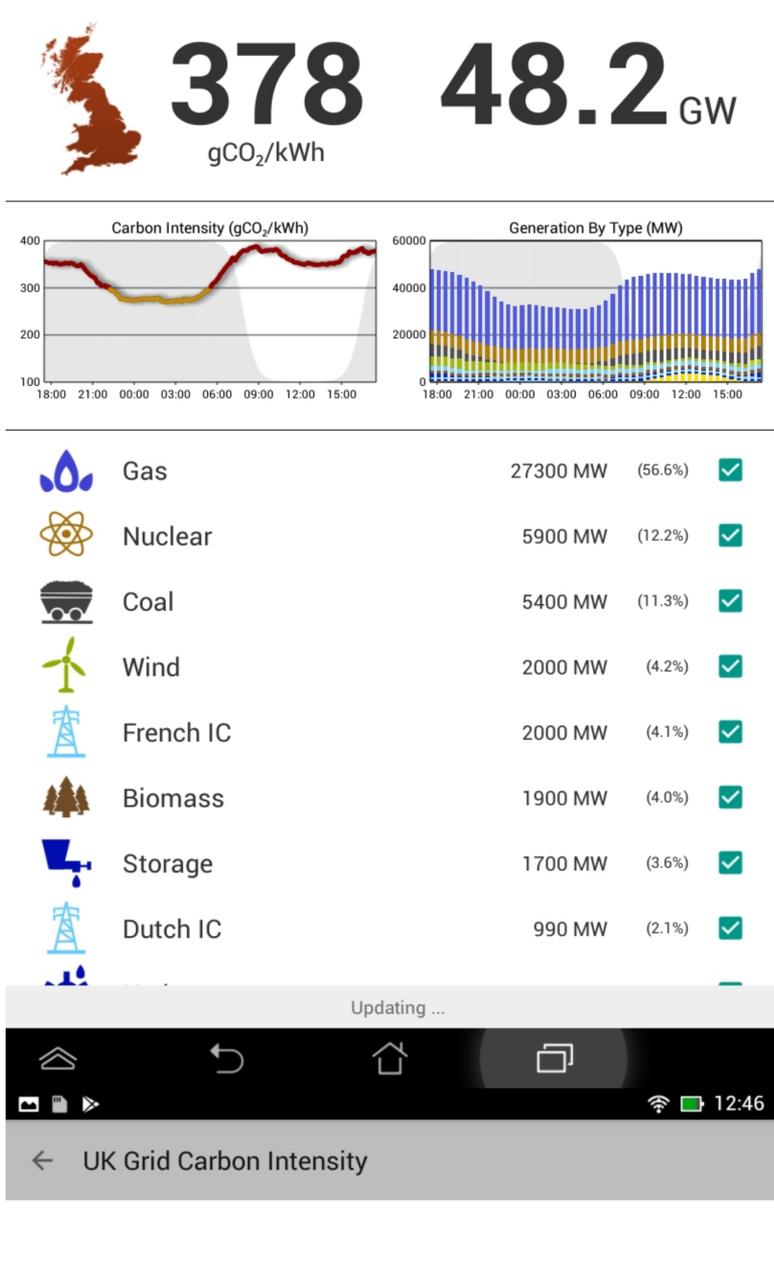
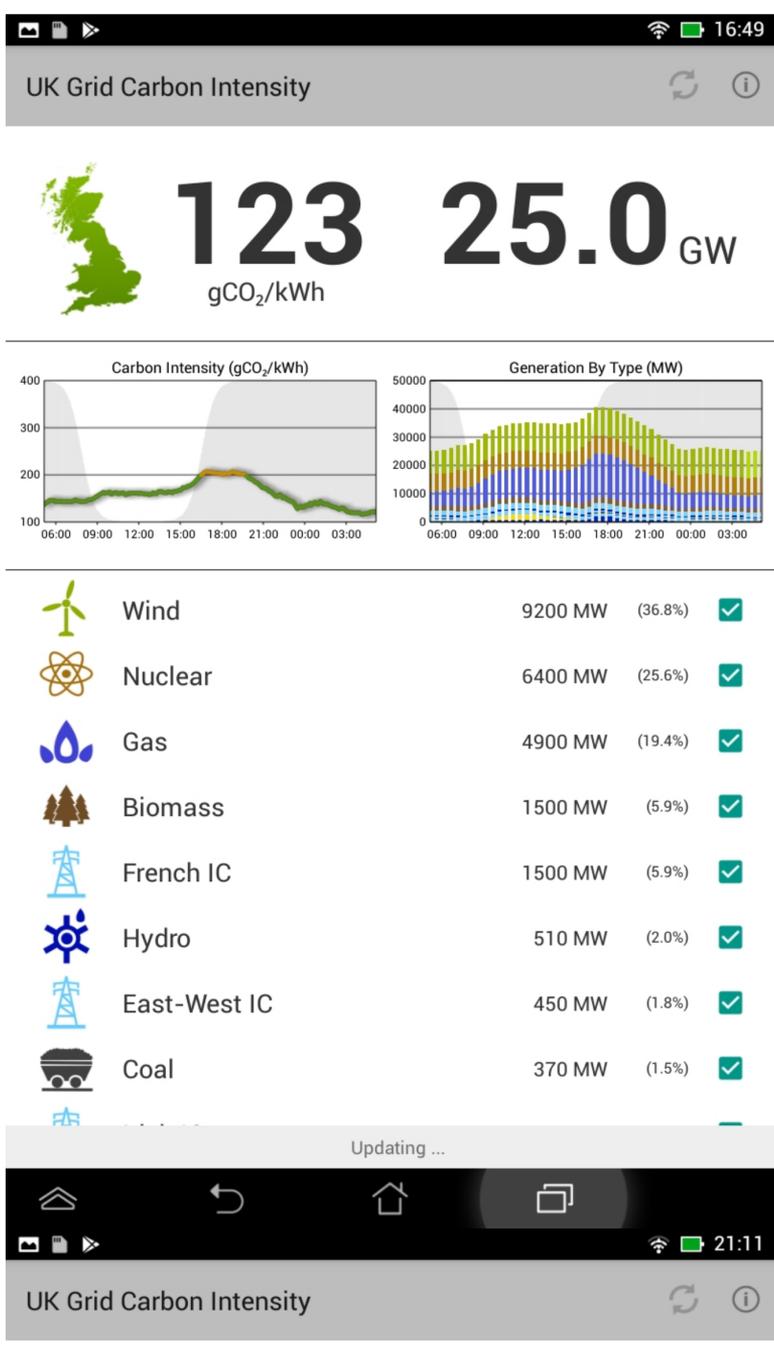
It makes obsolete the Legislature's AB1110 statute and Energy Commission's Power Content Label.

The choice is yours, please use modern methods to disclose power content.

ever onward,

Steve Uhler
sau@wwmpd.com

Additional submitted attachment is included below.



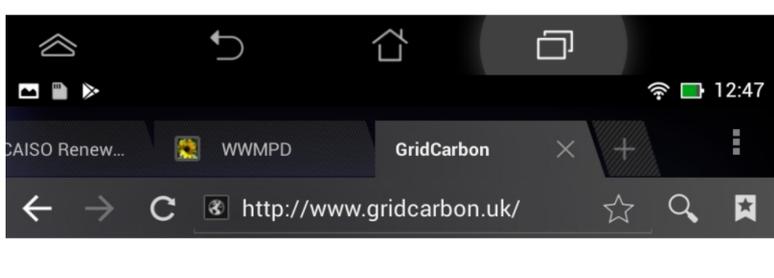
GridCarbon
Version 2.5

Deferring your use of electricity to off-peak times, when the grid carbon intensity is low, can help reduce your carbon footprint. For more information, please see:

www.gridcarbon.uk

This app uses live grid data available through the ELEXON portal.

Done



GridCarbon presents a summary of the generation mix data broken down into major categories of fuel type and various interconnectors. This data is converted into a grid carbon intensity value by weighting each generation type by its contribution to total generation and by its individual carbon intensity. See our [paper](#) describing the full methodology.



GridCarbon is maintained by Prof. Alex Rogers (iOS) and Dr. Oliver Parson (Android) at the University of Oxford and British Gas Connected Homes. To provide feedback, report bugs or request new features, please contact them at oliver.parson@bgch.co.uk and alex.rogers@cs.ox.ac.uk. For news about updates and new features, please follow [@GridCarbon](#).

