

DOCKETED

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Annual Report Form

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Please note, the annual report form on the workshop website appears to differ from the report form presented at the AB1110 workshop. Please see that the form shown at the workshop is made available in a timely manner. Also provide a theory of operation for the input form so the public does not have to reverse engineer the form to comment fully.

- Plant IDs

Consistent information starts with identification control.

Plants ID need to be uniform across all domains. The Energy Commission has many IDs for the same generating plant, this generates a need for a cross reference list. It wastes resources, Energy Commission has been around for more than forty years, yet still does have a uniform power plant ID system.

Energy Almanac QFER has a list but is not complete. Energy Almanac also has cross reference list that is incomplete.

Is the Energy Commission like SMUD where some staff create their own versions of data sets and withhold information? See <https://youtu.be/u4e7H1x8D14> SMUD video. This is easy to fix, its called PEN 502(c), see http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PEN&ionNum=502.

Please supply the table of power plants with unique IDs. Please consolidate the Energy Commission power plant item master and product structures files.

- Is manual input the only way to populate retail supplier data?

Is there a data format for import such as a tuple table, data interchange format (DIF), SQL, XML or other standard data import format that can be used to fill in the form?

The generation of the import table should be easily done from the retail suppliers business software programs. For example, SAP has a ad hoc reporter that is very capable and can easily programed to produce such a import table as well as produce the finished Power Content Label automatically and see that a printed copy is sent to the retail customer.

I would think anyone running a viable company that sells electricity would have a system capable enough to produce a import table in any format chosen and produce a finished label and send it automatically.

The use of spreadsheets is prone to error, as seen in the current set of Power Content Labels. Multiple versions of the labels are what the retail customer sees when they look to compare how well their utility does in comparison to what their utility views as the utility's "competitor".

I produced a set of webpages from the current set of Power Content Labels on the Commission's website to easily

compare utilities.

This was done from a system that can import, process and display on the Internet automatically.

The system can be distributed as a runtime and completely replace the Energy Commission's Annual Report Form. For those not familiar with what a runtime is, it is software designed to support the execution of computer programs written in some computer language. Runtime are similar to what is now called a "App".

Please view this Power Content comparison <http://wwmpd.com/psd/cec/2016/index.htm>

From this list it was easy to see that the categories did not match statute. Two version of renewables for hydro and bio, note two number 2s and number 4s in the item column.

What is the source of this error?

Most likely it's retail supplier is not using the current input form. This appears to be the fault of the Energy Commissions not supplying the form at a common location in a timely manner.

- Why not do the whole process using stoichiometry?

It's fast, it's easy and it makes a good sanity check of the Energy Commission's bureaucratic Power Source Disclosure process.

Don't let the perfect be the enemy of good, timeliness is required.

The current method leaves the customer having to buy a pig in a poke, never knowing what they got until almost two years later.

No actionable information is produced, except when the customer gets a Power Content Label showing less than expected without any prior notice they were not getting what they thought they were paying for. Then they find there is no recourse of value. This is a good way to loose a customer, the Energy Commissions customer, the energy buy public tired of being misinformed.

Now to the stoichiometry method.

Someone at the Energy Commission must already know this method, perhaps someone working in another silo?

For each generator:

Request the amount of fossil fuel used for each type of fuel.

For each retail supplier:

Request the amount of retail sales kWh for each portfolio offering.

Note The Energy Commission already collects the first to set of data.
Maybe you can request the data from someone working in another silo?

Use stoichiometry to calculate the greenhouse gases produced for each portfolio offering.

Divide the greenhouse gases by the kWh to get the generation greenhouse gas CO₂e pounds per kWh.

Disclose as generation greenhouse gas CO₂e pounds per kWh as single value like the way protein is listed on a nutrition label. Use only the units of measure that are on the customers electric bill. Keep it simple to understand, use kWh and pounds, we didn't go metric, use pounds, change to kilograms when ground beef is sold by the kilo.

List renewable source percentages without reference to RPS eligible RECs. The RPS system is not consistent and should not be shown on the power content label. Who cares what percentage RPS REC renewables are when coal is still involved.

Make it WYSIWYG, What You See Is What You Get, no footnotes, comparisons should not require a lot of squinting at the fine print.

ever onward,

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