

DOCKETED

Docket Number:	16-OIR-05
Project Title:	Power Source Disclosure - AB 1110 Implementation Rulemaking
TN #:	222693
Document Title:	Powerex's Comments on Draft Staff Paper " Revised Assembly Bill 1110 Implementation Proposal for Power Source Disclosure
Description:	N/A
Filer:	System
Organization:	Powerex Corp./Mike Benn
Submitter Role:	Public
Submission Date:	2/23/2018 1:08:11 PM
Docketed Date:	2/23/2018

Comment Received From: Mike Benn

Submitted On: 2/23/2018

Docket Number: 16-OIR-05

**Powerexâ€™s Comments on Draft Staff Paper â€™ Revised Assembly Bill 1110
Implementation Proposal for Power Source Disclosure**

Additional submitted attachment is included below.

February 23, 2018

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

Submitted Electronically

Re: Docket 16-OIR-05: Powerex’s Comments on Draft Staff Paper – Revised Assembly Bill 1110 Implementation Proposal for Power Source Disclosure

Powerex Corp. (“Powerex”) appreciates the opportunity to submit comments on the California Energy Commission (“CEC”) January 2018 *Draft Staff Paper - Revised Assembly Bill 1110 Implementation Proposal for Power Source Disclosure* (the “Revised Proposal”).

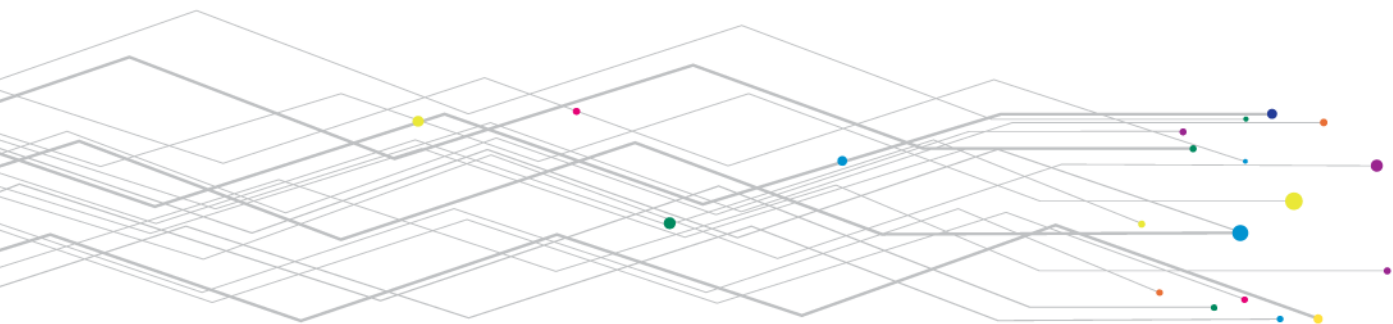
Powerex has been a California Air Resource Board (“CARB”) registered Asset Controlling Supplier (“ACS”) since 2013 and provides these limited comments with respect to the treatment of electricity that is sourced from ACS systems.

Specified System Mixes of Asset-Controlling Suppliers

In the Revised Proposal, the CEC has clarified that for power mix purposes, electricity sourced from an ACS system will no longer be reported as unspecified power, but rather retail suppliers will be allowed to report such electricity at the ACS-specific system mix. In other words, electricity sourced from an ACS system may be disaggregated into its respective resource mix. As the CEC identified in the Revised Proposal,¹ ACS systems have resource mixes that are composed primarily of large hydroelectric plants, with a small portion comprised of other generation sources (e.g. wind, solar, biomass, thermal units, unspecified purchases etc.).

The CEC intends to post ACS resource mix factors and ACS system emission intensity factors for each respective ACS system by April 1 of each year. Retail suppliers will then use these resources factors to determine the GHG intensity and the resource mix breakdown of electricity sourced from ACS systems.

¹ Revised Proposal at 22



Pursuant to the Revised Proposal, California customers will be informed that electricity sourced from an ACS system is primarily composed of large hydroelectric resources (with a small percentage of other resources) for power mix purposes, and this treatment aligns with the ACS system's low-GHG emissions intensity factor for GHG reporting purposes.

Powerex supports the modifications in the Revised Proposal related to the treatment of electricity sourced from an ACS system. Disaggregating electricity sourced from an ACS system into its respective resource mix will give California customers additional information of the composition of the ACS electricity that they consume and will avoid unnecessary customer confusion between the resource mix treatment and the GHG treatment of an ACS system.

Asset-Controlling Supplier Reporting

As Powerex wrote in its previous comments, the California Air Resources Board ("CARB") has developed a robust reporting framework to determine the GHG emissions factors for ACS systems.² Pursuant to section 95111(b)(3) of the Mandatory Reporting Regulations, CARB already publishes GHG emissions factors for all approved ACS on an annual basis.

In order to utilize the framework already developed by CARB, Powerex encourages the CEC to explore whether CARB can provide the CEC generator data aggregated based on resource type to determine the resource mix of each approved ACS. Alternatively, should CARB be unwilling or unable to provide such data directly to the CEC, an entity that is approved by and registered with CARB as an ACS could potentially provide generator data aggregated based on resource type directly to the CEC.

As an ACS supplier since 2013, Powerex believes its experience with the CARB reporting framework could be of assistance to CEC staff in developing a suitable reporting framework to determine the resource mix of an ACS system.

Powerex appreciates the opportunity to submit these comments and thanks you for your consideration. If you have any questions, please do not hesitate to contact the undersigned.

Kind regards,

/s/

Michael Benn
Energy Trade Policy Analyst
Powerex Corp.
mike.benn@powerex.com
604.891.6074

² See Powerex's Comments on Staff Pre-Rulemaking Workshop on Updates to the Power Source Disclosure Regulations dated August 11, 2017 available at http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-05/TN220701_20170811T151604_Mike_Benn_Comments_Docket_16OIR05_Powerex%E2%80%99s_Comments_on_Staff_P.pdf