

**DOCKETED**

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*Comment Received From: Steve Uhler*  
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## **Amending prior Power Source Disclosure filings and power content labels**

Comments on:  
TN224928\_20181009T085355\_AB\_1110\_Implementation\_Proposal\_Third\_Version.pdf  
<https://efiling.energy.ca.gov/GetDocument.aspx?tn=224928>

PSD is a truth-in-advertising program, designed to provide consumers information about the electricity products offered by their service provider.

If a rule allows any amount of renewable energy credits associated with directly delivered renewable generation above a threshold limit to be subsequently resold and amended power content labels are produced it appears to allow bait and switch in advertising of electricity products.

{16 CFR 238.1 Bait advertisement.

No advertisement containing an offer to sell a product should be published when the offer is not a bona fide effort to sell the advertised product.}

By allowing the amending of the power content label, regulations would then add bait and switch to the already pig in a poke nature of the label. Bait and switch means to advertise one thing and deliver something that is of less value. Pig in poke means to buy without knowing what you will get.

{PUC 398.4 (a) Every retail supplier that makes an offering to sell electricity that is consumed in California shall disclose its electricity sources and the associated greenhouse gases emissions intensity for the previous calendar year.

(b) The disclosures required by this section shall be made to potential end-use consumers in all product-specific written promotional materials that are distributed to consumers by either printed or electronic means, including the retail supplier's Internet Web site, if one exists, except that advertisements and notices in general circulation media shall not be subject to this requirement.}

Product-specific written promotional materials are advertisements such as the attached SMUD Greenergy brochure obtained at the 2018 Earth Day Event. Brochures are promotional documents often used for advertising.

Power content labels need to be WYSIWYG (What You See Is What You Get), delivered energy product needs to be bona fide (genuine; real), as advertised.

Ever onward,

Steve Uhler  
sau@wwmpd.com

*Additional submitted attachment is included below.*

Detach before mailing



**SMUD**

**BUSINESS REPLY MAIL**

FIRST-CLASS MAIL PERMIT NO.704 SACRAMENTO CA

POSTAGE WILL BE PAID BY ADDRESSEE

SACRAMENTO MUNICIPAL UTILITY DISTRICT  
GREENERGY, MS A203  
P O BOX 15830  
SACRAMENTO CA 95852-9974



NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES

We're proud of the fact that we exceed the minimum environmental and consumer protection standards set forth by the Center for Resource Solutions (CRS) through its Green-e Energy program. You can find more information on Green-e Energy certification standards at [green-e.org](http://green-e.org) or by calling 1-888-63-GREEN (4733).



[smud.org/greenergy](http://smud.org/greenergy)  
1-888-742-SMUD (7683)

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**Greenergy®**

Together we can  
make a difference

Powering forward.  
Together.



## One choice can change the world

People often wonder if their choices can really make a difference in our community and for our environment. They sure can.

Since 1997, more than 74,000 of your neighbors have made one small decision – to join SMUD’s Greenery. Participation in the program will help build new, cleaner energy resources, reducing the need to build polluting power plants.

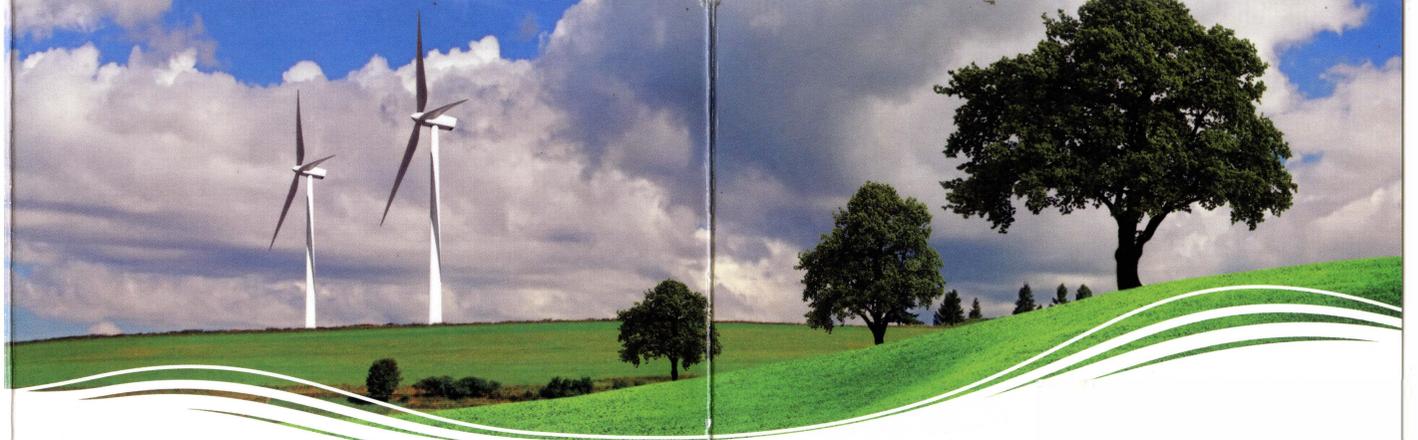
To date, our Greenery partners have enabled us to build:

**Wind** 3 turbines at the SMUD Solano Wind Farm

**Water** Rebuild Slab Creek, one of the dams on the Upper American River

**A little goes a long way**

*Prospective resource mix for 2016 includes: 30% Biomass, (CA, ID, NV, OR, WA or British Columbia), 10% Solar (CA), and 60% Wind (CA, ID, OR, WA or British Columbia).*



Detach before mailing

By joining Greenery, we will meet half or all of your electricity needs with power made from renewable sources, like wind, water, sun and biomass. And the cost is so reasonable – only \$3 or \$6 more per month – which we’ll simply add to your bill.

### Make a difference today!

Please check one of the following options:

- Yes!** I want to make a difference at the **\$3 per month level**, where 50 percent of my monthly electricity usage will be met with power generated from renewable sources.
- Yes!** I want to make a difference at the **\$6 per month level**, where 100 percent of my monthly electricity usage will be met with power generated from renewable sources.

Name \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State/Zip \_\_\_\_\_

Phone \_\_\_\_\_ Email \_\_\_\_\_

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