

DOCKETED

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Renewable generation has no value without retail sales

Additional submitted attachment is included below.

Renewable generation has no value without retail sales.

Comments on:

TN224928_20181009T085355_AB_1110_Implementation_Proposal_Third_Version.pdf

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=224928>

Power Source Disclosure that changes environmental attributes of generation is not accurate.

It takes more than generation. It takes transmission, distribution and ability to balance power for any generation to have value.

Null power does not exist without retail end users. Credit or blame for power use must go to retail end users.

Null Power is the underlying power remaining when the RECs have been stripped off and sold elsewhere. Null power is not renewable but is the unspecified and undifferentiated power that has the attributes of the overall system mix or the residual mix where specified power purchases have been removed. See <https://www.green-e.org/glossary>. This is a construct of the Renewable Portfolio Standards (RPS) and will create inaccuracies in the Power Source Disclosure labeling.

Large hydroelectric power is not eligible renewable and has no Renewable Energy Certificate (REC) associated with it. Any generation that produces no greenhouse gases (GHG) must retain clean attributes when quantified on Power Content Labels supplied to retail end users of such power.

Curtailment or simply not scheduling renewable generation because the inability to balance generation limits the available renewable output. Curtailment appears to be increasing. See http://ugemrp.com/caiso/dashboard/curtail/curtail_0.svg

Qualities and quantities listed on the Power Content Label must acknowledge the ability to balance and deliver and use clean power.

ever onward,

Steve Uhler

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