

**DOCKETED**

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*Comment Received From: Michael Benn  
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**Powerexâ€™s Comments on the Updates to the Power Source Disclosure Regulations.**

See attachment

*Additional submitted attachment is included below.*

October 25, 2018

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

**Re: Docket 16-OIR-05: Powerex's Comments on the Updates to the Power Source Disclosure Regulations.**

Powerex Corp. ("Powerex") welcomes the opportunity to submit comments on the California Energy Commission ("CEC") *Assembly Bill 1110 Implementation Proposal for Power Source Disclosure, Third Version* (the "Staff Paper"). Powerex appreciates the work that Energy Commission staff have done to date to include California Air Resource Board ("CARB") asset-controlling suppliers ("ACS") in the proposed updates to the Power Source Disclosure Regulations.

The Staff Paper proposes that energy procurements from an ACS system will be assigned the ACS-specific GHG emissions factor reported and verified under the CARB Mandatory Reporting Regulations ("MRR"). Additionally, for fuel mix purposes, ACS energy will no longer be reported as unspecified power, but rather at the underlying resource mix of the ACS system. The CEC will post resource mix and system GHG emissions intensity factors for ACS system power by April 1 of each year.

Powerex requests clarity as to whether there will be any additional reporting requirements to the CEC for ACS systems. Powerex notes that CARB has developed a robust reporting framework to determine the GHG emissions factors for ACS systems. Pursuant to section 95111(b)(3) of the MRR, 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.

Kind regards,

/s/

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

