

DOCKETED

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RPS-18-02 Does this mean SMUD only increased 1.62 percent in renewable output in compliance period 2?

Additional submitted attachment is included below.

Does this mean SMUD only increased 1.62 percent in renewable output in compliance period 2?

Is SMUD RPS compliant for Compliance Period 2 at 21.62 percent renewables?

In PUC 399.30 (a)(1) it says "a specified percentage of total kilowatthours sold to the utility's retail end-use customers, each compliance period, to achieve the targets of subdivision (c)."

The above words call for average specified percentage value per compliance period.

The specified percentage targets for each compliance period in (c) are:

20 percent by December 31, 2013, 20 percent on average no requirement to increase year to year.

25 percent by December 31, 2016, required to increase each year for average specified percentage of 25 percent per compliance period.

33 percent by December 31, 2020, required to increase each year for average specified percentage of 33 percent per compliance period.

44 percent by December 31, 2024, required to increase each year for average specified percentage of 44 percent per compliance period.

52 percent by December 31, 2027, required to increase each year for average specified percentage of 52 percent per compliance period.

60 percent by December 31, 2030, required to increase each year for average specified percentage of 60 percent per compliance period.

not less than 60% for all subsequent years.

Based on this Energy Commission approved report <https://efiling.energy.ca.gov/GetDocument.aspx?tn=226538> SMUD failed to increase in each of the intervening year to ensure 25 percent of total kilowatt hours were renewables sold to the utility's retail end-use customers in compliance period 2.

No other percentages are specified.

SMUD told their retail customers they only got 20 percent renewables in 2016 and had no green pricing products in that year as seen in this power content label.

https://www.energy.ca.gov/pcl/labels/2016_labels/Sacramento_Municipal_Utility_District.pdf

Perhaps there has been a inadvertent miscalculation?

thanks,

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