

DOCKETED

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CalWEA on Notice of Staff Pre-Rulemaking Workshop on Updates to the Power Source Disclosure Regulation

Additional submitted attachment is included below.



California Wind Energy Association

March 20, 2019

California Energy Commission
Docket Office
1516 Ninth Street
Sacramento CA 95814

Submitted Electronically to Docket 16-OIR-05

Re: CalWEA Comments on Notice of Staff Pre-Rulemaking Workshop on Updates to the Power Source Disclosure Regulations

The California Wind Energy Association (CalWEA) wishes to endorse the March 20, 2019, comments made jointly by Pacific Gas & Electric (PG&E) and Southern California Edison (SCE).

In particular, CalWEA supports:

- Allocating to load-serving entities (LSEs) the GHG emissions associated with how much they benefit from Cost Allocation Mechanism (CAM) resources. Although a small portion of the gas-fired system integration resources that serve all LSEs, this would be a step in the right direction of correctly informing consumers about the resources that are actually serving them.
- A commitment by the Energy Commission to consider an hourly accounting methodology in a new phase of this rulemaking so that consumers can eventually (and sooner rather than later) be properly informed about the resources that their LSEs are using to serve them. The labeling methodology that Energy Commission staff currently propose to adopt is, in large part, fiction.
- The sunset date for grandfathered “firmed and shaped” resources should not be removed.
- Unbundled RECs are not a source of energy that is used to provide electric services and, as such, are properly relegated to a footnote.
- Audit requirements should not be waived.

Sincerely,

/s/

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