

DOCKETED

Docket Number:	16-RPS-03
Project Title:	Amendments to Regulations Specifying Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities
TN #:	229638
Document Title:	Steve Uhler Comments Repackaged Contracts and PUC 399.13 (b), RPS-16-03
Description:	N/A
Filer:	System
Organization:	Steve Uhler
Submitter Role:	Public
Submission Date:	9/3/2019 9:58:05 PM
Docketed Date:	9/3/2019

Comment Received From: Steve Uhler
Submitted On: 9/3/2019
Docket Number: 16-RPS-03

Repackaged Contracts and PUC 399.13 (b), RPS-16-03

Repackaged Contracts and PUC 399.13 (b), RPS-16-03

How will "Repackaged Contracts" be addressed?

Staff paper (<https://efiling.energy.ca.gov/GetDocument.aspx?tn=229626>) appears to not address "Repackaged Contracts"

See 3.1.4.3.1. Repackaged Contracts found on page 21 of CPUC Decision 17-06-026 (<http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M191/K530/191530416.PDF>)

Will long term repackaged contracts that are repackaged as voluntary green pricing or shared renewable generation programs be considered for use for compliance with procurement requirements under PUC 399.13 (b)?

Here is a example of repackaged contracts, <https://www.c-span.org/video/?c4502670/buy-solar-shares-true>

How will a repackaged contract for net metered electricity, as in the above video, be addressed?

Steve Uhler
sau@wwmpd.com