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Are unbundled RECs retired in association with each electricity portfolio when listed on the power content label property of the retail supplier's customers?

1394.1. Retail Disclosure to Consumers (c) (5)

Quantity of unbundled RECs retired in association with each electricity portfolio, expressed as a percentage of retail sales.

1394.1. Retail Disclosure to Consumers (l) (1)

Footnote 1, which shall read, "Renewable energy credits (RECs) are tracking instruments issued for renewable generation. Unbundled renewable energy credits (RECs) represent renewable investments that do not deliver electricity to the retail supplier's customers. Unbundled RECs are not reflected in the power mix or GHG emissions intensities above. The eligible renewable percentage above does not reflect RPS compliance, which is determined using a different methodology."

If unbundled renewable energy credits represent renewable investments that do not deliver electricity to the retail supplier's customers, what is the worthwhile result of this investment?

If net metering is not retail sales and only retail sales are counted for renewable energy credits and power content labels, why does SMUD say that annual Power Content Labels will be published and made publicly available in their Title 24 10-115 Community Solar Application TN229860?

Please confirm the Energy Commission position on net metering as it applies the power content labels.

In Title 24 10-115 Community Solar Application TN229860, SMUD expects to utilize voluntary green pricing or shared renewable generation program portfolios pursuant to PUC 399.30. (c) (4) of which the Energy Commission has yet to adopt regulations specifying procedures for enforcement pursuant to PUC 399.30. (n). Please confirm the Energy Commission's position on use of procedures for enforcement that are not adopted by the commission's legislative body.

1394. Annual Submission to the Energy Commission (b) (2) (c) says,
Upon request by the Energy Commission, the retail supplier shall authorize WREGIS to confirm unbundled REC retirements associated with each electricity portfolio.

Please ensure that the WREGIS systems will prevent multiple counting of unbundled renewable energy credits through the use of adopted regulations specifying procedures for enforcement of PUC 399.21. (a) (1).

With current language in 1394.1. Retail Disclosure to Consumers (l) (1) and placing unbundled renewable energy credits on the power content label and claiming the unbundled renewable energy credits for Renewables Portfolio Standard, it appears to be multiple counting of the same unbundled renewable energy credits. It needs to be very clear who owns the unbundled renewable energy credits.

I find no value in reading about renewable energy I did not receive. The power content label needs to be what you see is what you get (wysiwyg). Don't list anything that is not the property of the retail supplier's customers.

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