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https://ww2.energy.ca.gov/pcl/power content label.html says:

You can think of the power content label as a "nutrition label" for electricity. The power content label provides information about the energy resources used to generate electricity that is put into the power grid. Just as a nutrition label provides information about the food you eat, the power content label provides information about your electricity sources.

Public Utilities Code - PUC 398.1. (a) says:

(a) The Legislature finds and declares that there is a need for reliable, accurate, timely, and consistent information regarding fuel sources for electric generation offered for retail sale in California.

My questions are related to what is included and excluded on the AB 1110 power content label.

For the example of the attached power content label, https://ww2.energy.ca.gov/pcl/labels/2017_labels/SMUD_2017_PCL.pdf

SolarShares which is net metered electricity usage and is not electric generation offered for retail sale in California is shown on the label.

Greenergy is available for 100% and 50% of electricity usage, yet the label only shows 100% Greenergy.

Where in the current and proposed regulations does it allow net metered electricity usage such as SolarShares to be included on the label?

Where in the current and proposed regulations does it allow retail sales such as 50% Greenergy to not be included on the label?

The current and proposed regulations do not provide reliable, accurate, timely, and consistent information for electric generation offered for retail sale in California without substantial changes in regulatory language.

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Additional submitted attachment is included below.

Version: July 2018

2017 POWER CONTENT LABEL

Sacramento Municipal Utility District

ENERGY RESOURCES	SMUD	Greenergy Partner	Greenergy PartnerPlus	Solar Shares	2017 CA Power Mix**
Eligible Renewable	19%	100%	100%	100%	29%
Biomass & biowaste	8%	0%	0%	0%	2%
Geothermal	1%	0%	0%	0%	4%
Eligible hydroelectric	2%	0%	0%	0%	3%
Solar	2%	100%	59%	100%	10%
Wind	5%	0%	41%	0%	10%
Coal	0%	0%	0%	0%	4%
Large Hydroelectric	35%	0%	0%	0%	15%
Natural Gas	44%	0%	0%	0%	34%
Nuclear	0%	0%	0%	0%	9%
Other	0%	0%	0%	0%	<1%
Unspecified sources of power*	2%	0%	0%	0%	9%
TOTAL	100%	100%	100%	100%	100%

^{* &}quot;Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources.

For specific information about this electricity product, contact:

Sacramento Municipal Utility District (SMUD)

888-742-7683

For general information about the Power Content Label, please visit:

http://www.energy.ca.gov/pcl/

For additional questions, please contact the California Energy Commission at:

844-454-2906

^{**} Percentages are estimated annually by the California Energy Commission based on the electricity sold to California consumers during the identified year.