

**DOCKETED**

<b>Docket Number:</b>	16-OIR-05
<b>Project Title:</b>	Power Source Disclosure - AB 1110 Implementation Rulemaking
<b>TN #:</b>	230371
<b>Document Title:</b>	Steve Uhler Comments - OIR-16-05 Unbundled RECs, Voluntary Markets and Double Counting
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Steve Uhler
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	10/27/2019 3:14:33 PM
<b>Docketed Date:</b>	10/28/2019

*Comment Received From: Steve Uhler*  
*Submitted On: 10/27/2019*  
*Docket Number: 16-OIR-05*

## **OIR-16-05 Unbundled RECs, Voluntary Markets and Double Counting**

OIR-16-05 Unbundled RECs, Voluntary Markets and Double Counting

When a utility customer contracts for renewable energy, the customer takes credit for use of renewable energy and expects no one else can further sell, transfer, or otherwise monetized their renewable energy credits for any purpose.

The Energy Commission must take care that multiple counting of RECs is not encouraged by showing RECs on the power content label.

Perhaps stakeholders suggesting calculations based on bundled and unbundled RECs combined (with the disclaimer that there may be double-counting of RE and GHG-benefits) have overlooked the Energy Commission obligations to prevent double counting of RECs (Renewable Energy Credits).

Perhaps the Energy Commission has overlooked their obligations pursuant to Public Utilities Code - PUC 399.30. (n).

Public Utilities Code - PUC 399.21. (a) (1) says,

(1) The commission and the Energy Commission shall ensure that the tracking system established pursuant to subdivision (c) of Section 399.25, is operational, is capable of independently verifying that electricity earning the credit is generated by an eligible renewable energy resource, and can ensure that renewable energy credits shall not be double counted by any seller of electricity within the service territory of the WECC.

Public Utilities Code - PUC 399.30. (n) says,

(n) The Energy Commission shall adopt regulations specifying procedures for enforcement of this article. The regulations shall include a public process under which the Energy Commission may issue a notice of violation and correction against a local publicly owned electric utility for failure to comply with this article, and for referral of violations to the State Air Resources Board for penalties pursuant to subdivision (o).

The Energy Commission shall adopt regulations specifying procedures for enforcement of Public Utilities Code - PUC 399.21. (a) (1), as it says above, before codifying the use of RECs on the power content label.

Steve Uhler  
sau@wwmpd.com