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M-S-R Comments re Power Source Disclosure Regulation 15-day Changes

Additional submitted attachment is included below.

**STATE OF CALIFORNIA ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION**

In the Matter of:

AB 1110 Implementation Rulemaking

Docket No. 16-OIR-05

**M-S-R PUBLIC POWER AGENCY COMMENTS ON PRE-RULEMAKING
AMENDMENTS TO THE POWER SOURCE DISCLOSURE PROGRAM**

The M-S-R Public Power Agency (M-S-R)¹ provides these comments to the California Energy Commission (Commission) on the November 25, 2019 Proposed 15-Day Language to the Power Source Disclosure Program proposed amendments.

Section 1394.1(a). M-S-R urges the Commission to adopt the proposed change to Section 1394.1(a) that would reflect implementation of the proposed amendments to the Power Source Disclosure (PSD) regulation in the 2021-reporting year based on generation and deliveries beginning on January 1, 2020. This change, although still allowing for less time to implement the new rules than what was anticipated under the statute, allows the Commission and reporting parties alike time to refine the various reporting templates and data collection/monitoring mechanisms to ensure that all of the necessary information can be timely and accurately reported.

Section 1392(a). The PSD regulation includes provisions in section 1392(a) and (b) that are not relevant to the PSD regulation or the Commission's responsibilities vis-à-vis the PCL. In order to avoid duplicative reporting obligations, the regulation should be amended to clearly state this. In the alternative, the regulation should only require generators that do not already report to EIA to report data to their balancing authority under section 1392 to provide the data. This change would avoid duplicative requirements, reduce the potential for error, and ensure greater efficiencies and consistency. M-S-R urges the Commission to recognize this overlap in the PSD regulation. (See M-S-R October 28, 2019, Comments on Proposed Amendments).

M-S-R appreciates the opportunity to provide this feedback to the Commission, and urges the Commission to incorporate these revisions into the proposed amendments to the PSD regulation.

Dated December 10, 2019

Respectfully submitted,



Martin R. Hopper
General Manager
M-S-R Public Power Agency

¹ Created in 1980, the M-S-R Public Power Agency is a public agency formed by the Modesto Irrigation District, the City of Santa Clara, and the City of Redding.