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| Docket Number: | 16-OIR-05 |
| Project Title: | Power Source Disclosure - AB 1110 Implementation Rulemaking |
| TN #: | 231072 |
| Document Title: | Steve Uhler Comments - No resource shuffling in power source disclosure program |
| Description: | N/A |
| Filer: | System |
| Organization: | Steve Uhler |
| Submitter Role: | Other Interested Person |
| Submission Date: | 12/10/2019 2:49:23 PM |
| Docketed Date: | 12/10/2019 |

Comment Received From: Steve Uhler
Submitted On: 12/10/2019
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Title 20 Section 1393. Accounting Methodology (a)(6) as proposed will allow resource shuffling that is prohibited by Public Utilities Code - PUC 454.53.

Pursuant to Public Utilities Code - PUC 454.53, the Energy Commission, the State Air Resources Board, and all other state agencies shall incorporate this no resource shuffling policy into all relevant planning. This is to be done by utilizing programs authorized under existing statutes so as to achieve the policy of no resource shuffling described in subdivision (a) Public Utilities Code - PUC 454.53.

ARTICLE 14. Disclosure of Sources of Electrical Generation [398.1 - 398.5] program authorized under existing statutes is a relevant program for disclosing the full effect of electric service in California and the western grid. From fuel input into generating units to the retail sales on the end user side of the revenue meter of the retail customer, every gram of greenhouse gas is to be counted to plan how to achieve the goal pursuant to Public Utilities Code - PUC 454.53. (a) that states:

"It is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. The achievement of this policy for California shall not increase carbon emissions elsewhere in the western grid and shall not allow resource shuffling. The commission and Energy Commission, in consultation with the State Air Resources Board, shall take steps to ensure that a transition to a zero-carbon electric system for the State of California does not cause or contribute to greenhouse gas emissions increases elsewhere in the western grid, and is undertaken in a manner consistent with clause 3 of Section 8 of Article I of the United States Constitution. The commission, the Energy Commission, the State Air Resources Board, and all other state agencies shall incorporate this policy into all relevant planning."

Do not adopt Title 20 Section 1393. Accounting Methodology as proposed in the express terms in docket 16-OIR-05.

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