

DOCKETED

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Additional submitted attachment is included below.



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December 10, 2019

California Energy Commission
Docket Unit, MS-4

Re: Docket No. 16-OIR-05

1516 Ninth Street
Sacramento, CA 95814-5512

Marin Clean Energy Comments on the 15-Day Language Modification of Regulations Governing the Power Source Disclosure Program

Marin Clean Energy (“MCE”) submits the following limited comments on the *15-Day Language Modification of Regulations Governing the Power Source Disclosure Program*, issued by the California Energy Commission (“Commission”) on November 25, 2019.

MCE appreciates the Commission’s continued efforts to refine and clarify the proposed regulations to implement Assembly Bill (“AB”) 1110. MCE is particularly appreciative and supportive of the new revisions in Sections 1394(b) and 1394.1(a) that defer GHG-data reporting to calendar year 2021. This revision helps minimize market disruption and customer confusion by not penalizing load-serving entities that procured to existing regulatory requirements in 2019. It also bolsters market stability in the electricity sector by demonstrating that new regulatory requirements will not have a retroactive impact on past procurement.

MCE reiterates its appreciation for the Commission’s diligent efforts in this docket. MCE looks forward to continued collaboration with staff to ensure the final regulations facilitate reliable, accurate, and timely reporting of GHG-emissions related to electricity retail sales without causing undue customer confusion and costs.

Respectfully submitted,

Dawn Weisz
Chief Executive Officer
Marin Clean Energy