DOCKETED	
Docket Number:	16-RPS-03
Project Title:	Amendments to Regulations Specifying Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities
TN #:	231378
Document Title:	Steve Uhler Comments - RPS-16-03 PUC 399-33-(b)(3) Resource Shuffling
Description:	N/A
Filer:	System
Organization:	Steve Uhler
Submitter Role:	Other Interested Person
Submission Date:	1/4/2020 7:53:49 PM
Docketed Date:	1/6/2020

Comment Received From: Steve Uhler Submitted On: 1/4/2020 Docket Number: 16-RPS-03

RPS-16-03 PUC 399-33-(b)(3) Resource Shuffling

RPS-16-03 PUC 399.33.(b)(3) Resource Shuffling

Pursuant to Public Utilities Code - PUC 399.33. (b) (3), The local publicly owned electric utility has attempted to mitigate against the reduction of generation to below 20 percent of the powerplant's total capacity by attempting to sell the powerplant or attempting to sell the generation from the powerplant to the extent it is practicable and does not result in resource shuffling.

What is the definition of "resource shuffling"?su

Steve Uhler sau@wwmpd.com