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Pursuant to Public Utilities Code - PUC 399.16. (a) Various electricity products from eligible renewable energy resources located within the WECC transmission network service area shall be eligible to comply with the renewables portfolio standard procurement requirements in Section 399.15. These electricity products may be differentiated by their impacts on the operation of the grid in supplying electricity, as well as meeting the requirements of this article.

Perhaps Energy Commission staff have overlooked key electricity products that are sold to the customer as a retail sale in defining the staff's "Electricity product".

Various electricity products have impacts on the operation of the grid in supplying electricity, as well as meeting renewables portfolio standard procurement requirements.

It would be impossible to meet renewables portfolio standard procurement requirements without these electricity products that the local publicly owned electric utility requires their retail customers to pay a tariff.

Section 3201 has this definition:

Section 3201. Definitions. (m) (m) "Electricity product" means either:

Section 3201. Definitions. (m) (1)

(1) Electricity and the associated renewable energy credit generated by an eligible renewable energy resource.

Section 3201. Definitions. (m) (2)

(2) An unbundled renewable energy credit.

To the above definition, these electricity products that have impacts on the operation of the grid in supplying electricity must be added:

Section 3201. Definitions. (m) (3)

(3) Transmission lines.

Section 3201. Definitions. (m) (4)

(4) Distribution lines.

Section 3201. Definitions. (m) (5) (5) Substations.

Section 3201. Definitions. (m) (6) (6) Transformers.

Section 3201. Definitions. (m) (7)

(7) Revenue meters.

Each of these electricity products have costs that the retail customer pays for. They all cause losses in the amount of kilowatthours that can be supplied the retail customer.

The local publicly owned electric utility recovers the costs for losses of kilowatthours in these grid components mostly through service charges to the retail customer.

The difference in kilowatthours between the metered generation and the metered customer is the amount of kilowatthours that the retail customer pays for in service charges.

The kilowatthours need to be accounted for in the tracking system pursuant to Public Utilities Code - PUC 399.25. (b) so the Energy Commission can ensure pursuant to Public Utilities Code - PUC 399.21. (a) (1) 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.

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