

DOCKETED

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Please explain how a renewable energy credit can be counted for compliance with the renewables portfolio standard and be counted in the below listed programs and not be double counted pursuant to Public Utilities Code - PUC 399.21. (a) (2).

CARB's Voluntary Renewable Electricity Program

CARB's Low Carbon Fuel Standard (LCFS) program (How does WREGIS ensure no double counting?)

Community solar program pursuant to Title 24, Part 1, section 10-115, of the California Code of Regulations

The description of Section 3204 (b)(9)(b)3.i in the initial statement of reasons appears to say the environmental attributes associated with the production of electricity are not counted and have no value when counted in other accounting systems.

Please also explain how 3204 (b)(9)(b)3.i is comporting with Public Utilities Code - PUC 399.21. (a) (2) Each renewable energy credit shall be counted only once for compliance with the renewables portfolio standard of this state or any other state, or for verifying retail product claims in this state or any other state.

These inquiries are submitted pursuant to Government Code - GOV 11346.5. (b).

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