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Pursuant to Public Utilities Code - PUC 398.1. (b) The purpose of ARTICLE 14. Disclosure of Sources of Electrical Generation [398.1 - 398.5] is to establish a program under which entities offering electric services in California disclose accurate, reliable, and simple to understand information on the sources of energy, and the associated emissions of greenhouse gases, that are used to provide electric services.

Pursuant to Title 20 Section 1391, "Electricity portfolio" means the electricity products that a retail supplier offers to sell to consumers in California under terms and conditions specific to an offer or to a tariff.

Please define "products" when paired with "electricity", as in "electricity products". Where is the point at which the "electricity" enters the stream of commerce and becomes a marketable form of "product" for retail sale to retail end users? If the Energy Commission's definition differs from product liability law as it may apply to electricity, please justify your definition. See *Fong v. Pacific Gas & Elec. Co.*(1988) 199 C.A.3d 30, 38, 245 C.R. 436 [rejecting contention that electricity had become a product since delivery lines had crossed plaintiffs' property line; test is whether it has been metered], *Witkin*. See also <https://law.justia.com/cases/california/court-of-appeal/3d/199/30.html>

Please define "services" when paired with "electric", as in "electric services".

Please define "electric service product" found in Title 20 Section 1392 (d).

Please describe how the disclosure of accurate, reliable, and simple to understand information on the sources of energy, and the associated emissions of greenhouse gases, that are used to provide electric services is achieved on the power content label in a manner that will not confuse electric services with electricity products.

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