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RPS-18-02 Where does electricity become a product

RPS-18-02 Where does electricity become a product?

Dear Energy Commission Commissioners,

Where does electricity become a product?

This should not be difficult to answer.

I have made written and verbal inquiries to the Energy Commission as to where electricity becomes a product.

These inquiries remain unanswered by Energy Commission staff.

RPS law requires POUs to procure a minimum quantity of electricity products from eligible renewable energy resources, including renewable energy credits.

Any enforcement of verification process or adoption of verification results that does not define where electricity becomes a product should not be used to enforce RPS procurement requirements.

Please see that the Energy Commission defines where electricity becomes a product for the record to avoid the use of underground regulations in specifying procedures for enforcement of RPS.

Don't consider, adopt or use any verification results filed in docket 18-RPS-02 for compliance enforcement until where electricity becomes a product is defined in procedures for enforcement of RPS.

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