

**DOCKETED**

<b>Docket Number:</b>	16-RPS-03
<b>Project Title:</b>	Amendments to Regulations Specifying Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities
<b>TN #:</b>	234017
<b>Document Title:</b>	Steve Uhler Comments - exclusion shall be limited to electricity products
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Steve Uhler
<b>Submitter Role:</b>	Other Interested Person
<b>Submission Date:</b>	7/27/2020 8:31:30 AM
<b>Docketed Date:</b>	7/27/2020

*Comment Received From: Steve Uhler  
Submitted On: 7/27/2020  
Docket Number: 16-RPS-03*

## **RPS-16-03 exclusion shall be limited to electricity products**

RPS-16-03 exclusion shall be limited to electricity products

A participating customer may not always consume their allotted capacity of kilowatts generated by an eligible renewable energy resource. This unused capacity will be sold to other retail customers. The electricity product credited to a participating customer for the kilowatthours not consumed by a participating customer will be PCC-3, unbundled renewable energy credits.

Pursuant to Public Utilities Code - PUC 399.30. (c) (4), beginning January 1, 2014, in calculating the procurement requirements under this article, a local publicly owned electric utility may exclude from its total retail sales the kilowatthours generated by an eligible renewable energy resource that is credited to a participating customer pursuant to a voluntary green pricing or shared renewable generation program.

Any exclusion shall be limited to electricity products that do not meet the portfolio content criteria set forth in paragraph (2) or (3) of subdivision (b) of Section 399.16.

How will the Energy Commission ensure that only PCC-1 renewable energy credits for the electricity products credited to a participating customer pursuant to a voluntary green pricing or shared renewable generation program may be excluded from the publicly owned electric utility's total kilowatthours sold to the utility's retail end-use customers, each compliance period?

Steve Uhler  
sau@wwmpd.com