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RPS-16-03 Tracking product procurement and customer participation

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Dear Energy Commission Commissioners,

The California Renewables Portfolio Standard Program requires each local publicly owned electric utility to procure a minimum quantity of electricity products from eligible renewable energy resources.

Electricity is not a product before it is metered as a retail sale.

A Renewable Energy Credit (REC), also known as a "WREGIS Certificate" does not track product procurement.

The Renewables Portfolio Standard Eligibility Ninth Edition (Revised) Commission Guidebook references a RPS Online System.

Perhaps the RPS Online System is where products such as electricity products are tracked.

The guidebook provides an overview of the RPS Online System and describes the process for establishing an account for organizations wishing to participate in the RPS program.

There appears to be no process for establishing an RPS Online System account for customers wishing to participate in the RPS program pursuant to a voluntary green pricing or shared renewable generation program.

Customers pursuant to a voluntary green pricing or shared renewable generation program have no way of controlling their participation in the RPS program.

Customers pursuant to a voluntary green pricing or shared renewable generation program may wish to monetize Renewable Energy Credits for kilowatthours that local publicly owned electric utility may wish to exclude from total retail sales.

Please table any agenda item for adopting regulations for California Renewables Portfolio Standard Program section 399.30(c)(4) until the RPS Online System is updated to allow customers to participate in the RPS program pursuant to a voluntary green pricing or shared renewable generation program.

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