

DOCKETED

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RPS-16-03 3204(b)(9) exclusion of unbundled RECs

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Renewable energy credits (RECs) are tracking instruments issued for renewable generation. Unbundled renewable energy credits (RECs) represent renewable generation that was not delivered to serve retail sales.

SMUD Renewable Energy Resources Procurement Plan (RPS Procurement Plan) April 2019 speaks of excluding renewable energy from overall retail sales prior to calculating SMUD's RPS obligation.

See paragraph starting with "These two voluntary programs result in SMUD customers engaging in renewable procurement..." on PDF page 10.

<https://www.smud.org/-/media/Documents/Corporate/About-Us/Board-Meetings-and-Agendas/2019/Apr/Policy-Info-Packet--Apr-3-2019.pdf#page=10>

SMUD's 2019 power content label <https://www.smud.org/SMUDPCL> shows "Greenenergy" portfolios with Percentage of Retail Sales Covered by Retired Unbundled RECs.

How will the Energy Commission prevent the exclusions from retail sales for Greenenergy portfolios covered by unbundled RECs? This renewable generation was not delivered to serve retail sales by definition contained on the label.

How will the Energy Commission prevent unbundled RECs claimed on power content labels from being counted for RPS?

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Additional submitted attachment is included below.

2019 POWER CONTENT LABEL**Sacramento Municipal Utility District****smud.org/SMUDPCL**

ENERGY RESOURCES	SMUD General Mix	Greenergy PartnerPlus	Greenergy Partner	SolarShares Commercial	SolarShares Residential	SolarShares Developer	2019 CA Power Mix
Eligible Renewable¹	27.8%	19.0%	0.0%	100.0%	100.0%	100.0%	31.7%
Biomass & Biowaste	6.7%	0.0%	0.0%	0.0%	0.0%	0.0%	2.4%
Geothermal	2.8%	0.0%	0.0%	0.0%	0.0%	0.0%	4.8%
Eligible Hydroelectric	1.3%	0.0%	0.0%	0.0%	0.0%	0.0%	2.0%
Solar	1.2%	2.0%	0.0%	100.0%	100.0%	100.0%	12.3%
Wind	15.8%	17.1%	0.0%	0.0%	0.0%	0.0%	10.2%
Coal	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.0%
Large Hydroelectric	44.3%	0.0%	0.0%	0.0%	0.0%	0.0%	14.6%
Natural Gas	26.6%	81.0%	100.0%	0.0%	0.0%	0.0%	34.2%
Nuclear	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	9.0%
Other	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%
Unspecified sources of power²	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	7.3%
TOTAL	100%	100%	100%	100%	100%	100%	100%
Percentage of Retail Sales Covered by Retired Unbundled RECs³	2.8%	81.0%	100.0%	0.0%	0.0%	0.0%	

¹The eligible renewable percentage above does not reflect RPS compliance, which is determined using a different methodology.

²Unspecified power is electricity that has been purchased through open market transactions and is not traceable to a specific generation source.

³Renewable energy credits (RECs) are tracking instruments issued for renewable generation. Unbundled renewable energy credits (RECs) represent renewable generation that was not delivered to serve retail sales. Unbundled RECs are not reflected in the power mix or GHG emissions intensities above.

**If you are a participant in a product that shows a “Percentage of Retail Sales Covered by Retired Unbundled RECs”, SMUD purchased unbundled RECs to match all or a portion of your energy usage. For more information about the renewable sources of these unbundled RECs, please refer to our webpage listed above.
Some customers may be served by more than one electricity portfolio.**

For specific information about this electricity product, contact:

**Sacramento Municipal Utility District (SMUD)
888-742-7683**

For general information about the Power Content Label, please visit:

<http://www.energy.ca.gov/pcl/>

For additional questions, please contact the California Energy Commission at:

Toll-free in California: 844-454-2906
Outside California: 916-653-0237

For more information on unbundled RECs, go to smud.org/en/Corporate/Environmental-Leadership/Power-Sources.