

**DOCKETED**

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**RPS-21-02 Accommodating changes in tracking requirements**

*Additional submitted attachment is included below.*

## RPS-21-02 Accommodating changes in tracking requirements

Much has changed since the last revision of the Renewables Portfolio Standard Eligibility Guidebook.

Energy storage is the future of any electric system that hopes to produce ever larger amounts kilowatt hours from renewable energy sources.

The ability to place energy storage at the most efficient opportunity on the electric grid should be supported by policy.

It has been said that electric generators sell watt hours, while having to produce volt amp hours. The ratio of watts to volt amps is known as power factor. Some energy storage methods are capable of improving power factor, but can only do so if placed in a location where they are effective.

Improving power factor will reduce the amount of volt amp hours per watt hour required. This is a efficiency improvement that reduces need for additional power sources.

Associating energy storage with a renewable source can be done by tracking methods that determine ownership of the all renewable and environmental attributes associated with the production of electricity.

WREGIS may ensure renewable energy credits will not be double counted for Renewable Portfolio Standard (RPS) procurement requirements.

WREGIS does not ensure renewable energy credits will not be double counted by any seller of electricity within the service territory of the WECC.

Perhaps this is why the Energy Commission wishes to discuss and solicit comments on the Renewables Portfolio Standard treatment and requirements for energy storage devices associated with renewable resources participating in the RPS.

By tracking ownership of all renewable and environmental attributes associated with the production of electricity, the Energy Commission could ensure renewable energy credits will not be double counted by any seller of electricity within the service territory of the WECC.

This ownership tracking would allow energy storage to be placed at the most efficient opportunity on the electric grid.

By requiring energy storage system owners to show ownership of all renewable and environmental attributes associated with the production of electricity, the association with renewable resources participating in California's RPS is proven.

Law changes require ownership tracking all renewable and environmental attributes associated with the production of electricity.

Title 24 requirements for Photo Voltaic systems, and policies that encourage battery storage in new homes require tracking of ownership to prevent double counting.

Title 24 provisions for community renewable energy sources to fulfill requirement for Photo Voltaic systems, and policies that encourage battery storage in new homes require tracking of ownership to prevent double counting.

Net energy metering laws and tariffs require tracking of ownership to prevent double counting.

Pursuant to Public Utilities Code 399.21(a)(1), The Energy Commission shall ensure that the tracking system established pursuant to subdivision (c) of Public Utilities Code Section 399.25, is operational, is capable of independently verifying that electricity earning the credit is generated by an eligible renewable energy resource, and can ensure that renewable energy credits shall not be double counted by any seller of electricity within the service territory of the WECC.

Pursuant to Public Utilities Code 399.25(c), The Energy Commission shall establish a system for tracking and verifying renewable energy credits that, through the use of independently audited data, verifies the generation of electricity associated with each renewable energy credit and protects against multiple counting of the same renewable energy credit. The Energy Commission shall consult with other western states and with the WECC in the development of this system.

Perhaps changes to WREGIS will be required due to the fact that WREGIS accounting system does not track ownership of all renewable and environmental attributes associated with the production of electricity. WREGIS only accounts the location of the certificates.

There may be need to find more cost effective ways than use of WREGIS to track ownership of all renewable and environmental attributes associated with the production of electricity.

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