DOCKETED	
Docket Number:	21-RPS-01
Project Title:	Renewables Portfolio Standard Compliance Period 3 (2017 - 2020) Verification and Compliance
TN #:	247730
Document Title:	Steve Uhler Comments - RPS-2021-01 Ensuring the tracking system is operational
Description:	N/A
Filer:	System
Organization:	Steve Uhler
Submitter Role:	Other Interested Person
Submission Date:	11/28/2022 9:43:45 AM
Docketed Date:	11/28/2022

Comment Received From: Steve Uhler Submitted On: 11/28/2022 Docket Number: 21-RPS-01

RPS-2021-01 Ensuring the tracking system is operational

RPS-2021-01 Ensuring the tracking system is operational

How does commission staff match retail contracts for renewable energy with generation to ensure that generation is accurately reported, recorded, and counted only once for any regulatory or voluntary program?

What regulations implement 399.21. (a)(1) of PUC-ARTICLE 16. California Renewables Portfolio Standard Program 399.11-399.33?

Steve Uhler sau@wwmpd.com

Additional submitted attachment is included below.

RPS-2021-01 Ensuring the tracking system is operational

CEC staff rely on the generation information as reported to WREGIS.

WREGIS was designed to ensure that generation is accurately reported, recorded, and counted only once for any regulatory or voluntary program.

Pursuant to 399.21. (a) (1) of PUC-ARTICLE 16. California Renewables Portfolio Standard Program 399.11-399.33, The commission and the Energy Commission shall ensure that the tracking system established pursuant to subdivision (c) of 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 399.12. (h)(2) of PUC-ARTICLE 16. California Renewables Portfolio Standard Program 399.11-399.33, "Renewable energy credit" includes all renewable and environmental attributes associated with the production of electricity from the eligible renewable energy resource, except for an emissions reduction credit issued pursuant to Section 40709 of the Health and Safety Code and any credits or payments associated with the reduction of solid waste and treatment benefits created by the utilization of biomass or biogas fuels.

How does WREGIS ensure that generation is accurately reported, recorded, and counted only once for any regulatory or voluntary program, when a retail contract for renewable energy exists?

How does WREGIS track title to ownership of all renewable and environmental attributes associated with the production of electricity from the eligible renewable energy resource?

How does commission staff match retail contracts for renewable energy with generation to ensure that generation is accurately reported, recorded, and counted only once for any regulatory or voluntary program?

What regulations implement 399.21. (a) (1) of PUC-ARTICLE 16. California Renewables Portfolio Standard Program 399.11-399.33?

Steve Uhler sau@wwmpd.com