

**DOCKETED**

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**RPS-2021-01 Perhaps CEC's accounting system is counting more than once**

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Please table approval of the Renewables Portfolio Standard 2017-2020 Retail Sellers Procurement Verification Staff Draft Report until all of the ineligible renewable energy credits are accounted for.

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*Additional submitted attachment is included below.*

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Any energy from eligible renewable energy resources that is consumed by a load-serving entity (LSE) would be counted more than once if the credit is used for the purpose of meeting the renewables portfolio standard (RPS).

Eligible renewable energy resources consumed on site by retail sellers are allowed to be used to create renewable energy credits after certain procedures and losses are accounted for. A LSE would be counting more than once if these credits are used for the purpose of meeting the RPS.

Eligible renewable energy resources consumed by retail sellers while providing retail electric service are allowed to be used to create renewable energy credits. A LSE would be counting more than once if these credits are used for the purpose of meeting RPS requirements.

The Renewables Portfolio Standard 2017-2020 Retail Sellers Procurement Verification Staff Draft Report does not describe what happens to generating a percentage of total retail sales of electricity in California from eligible renewable energy resources, if generation consumed retail sellers while providing retail electric service is allowed to be used to create renewable energy credits that are later used for the purpose of meeting RPS requirements.

Perhaps CEC's accounting system is counting more than once if the eligible renewable energy resources consumed retail sellers while providing retail electric service are not considered and reported prior to any other RPS verification is considered?

Please table approval of the Renewables Portfolio Standard 2017-2020 Retail Sellers Procurement Verification Staff Draft Report until all of the ineligible renewable energy credits are accounted for.

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