

DOCKETED

Docket Number:	21-OIR-01
Project Title:	Rulemaking to Amend Regulations Governing the Power Source Disclosure Program
TN #:	252690
Document Title:	Steve Uhler Comments Meeting the need for reliable, accurate, timely, and consistent energy information that is simple to under
Description:	Meeting the need for reliable, accurate, timely, and consistent energy information that is simple to understand
Filer:	System
Organization:	Steve Uhler
Submitter Role:	Other Interested Person
Submission Date:	10/24/2023 4:35:47 AM
Docketed Date:	10/24/2023

*Comment Received From: Steve Uhler
Submitted On: 10/24/2023
Docket Number: 21-OIR-01*

OIR-2021-01 Meeting the need for reliable, accurate, timely, and consistent energy information that is simple to understand

OIR-2021-01 Meeting the need for reliable, accurate, timely, and consistent energy information that is simple to understand

Steve Uhler
sau@wwmpd.com

Additional submitted attachment is included below.

OIR-2021-01 Meeting the need for reliable, accurate, timely, and consistent energy information that is simple to understand

Power Source Disclosure is a program under which retail suppliers offering electric services in California disclose accurate, reliable, and simple to understand information on the sources of energy, and the associated emissions of greenhouse gases, that are used to provide electric services.

"Retail supplier" means an entity that offers an electricity product for sale to retail consumers in California, including an electrical corporation, local publicly owned electric utility, electric service provider, and community choice aggregator.

Regulation amendments and additions required pursuant SB1158 and AB242 will need to consider legislative bills and case law not yet implemented in regulations. Not currently included in 21-OIR-01 Rulemaking to Amend Regulations Governing the Power Source Disclosure Program is the requirement in SB100 to not allow resource shuffling, and the effect of SB253 requirement to disclose greenhouse gas emissions. Case law in Fong versus PG&E 1977 defines electricity as a product has not been implemented in Power Source Disclosure, and Renewables Portfolio Standard that Power Source Disclosure relies on. Renewables Portfolio Standard's WREGIS accounting does not track ownership of environmental attributes of generation, and considers electricity a product before it is at a marketable voltage. Electricity not at a marketable voltage can't be sold to retail customers.

There is no need to implement a "Modernized Database", there are ample data in public databases. Greenhouse gas sources and hourly generation data for electricity is available from the Energy Information Administration. Smart meters can provide hourly retail sales and alternating current system losses currently not considered. There are many off the shelf reporting systems available that can meet and exceed power content labeling requirements. Accuracy of labels can be proven by the reporting system's ability to identify data errors that are often missed by systems that use averages and factors.

The regulations should require the Energy Commission to produce a basic power content label and greenhouse gas report for each retail supplier. If a retail supplier wishes to offer other portfolios and adjust basic greenhouse gas reports, they shall be required to provide all data to support any additional portfolios and adjustments.

Steve Uhler
sau@wwmpd.com