

**DOCKETED**

<b>Docket Number:</b>	21-RPS-01
<b>Project Title:</b>	Renewables Portfolio Standard Compliance Period 3 (2017 - 2020) Verification and Compliance
<b>TN #:</b>	253254
<b>Document Title:</b>	Steve Uhler Comments - RPS-2021-01 The portion of annual sales derived from unbundled renewable energy credits
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Steve Uhler
<b>Submitter Role:</b>	Other Interested Person
<b>Submission Date:</b>	11/19/2023 8:12:09 AM
<b>Docketed Date:</b>	11/20/2023

*Comment Received From: Steve Uhler  
Submitted On: 11/19/2023  
Docket Number: 21-RPS-01*

**RPS-2021-01 The portion of annual sales derived from unbundled renewable energy credits**

RPS-2021-01 The portion of annual sales derived from unbundled renewable energy credits

No adoption of any RPS verification shall be done without verification ownership of environment attributes of renewable generation.

Attached are examples where double counting of environment attributes of renewable generation have not been verified as not occurring.

Steve Uhler  
sau@wwmpd.com

*Additional submitted attachment is included below.*

RPS-2021-01 The portion of annual sales derived from unbundled renewable energy credits

Pursuant to subsection 398.4(h)(7) of the Public Utilities Code, the portion of annual sales derived from unbundled renewable energy credits shall be included in the disclosures in a format determined by the Energy Commission. A retail supplier may include additional information related to the sources of the unbundled renewable energy credits.

There are no listings identifying these 398.4(h)(7) unbundled renewable energy credits in the CEC's RPS verification. Perhaps amounts listed as "Green Pricing Program" include 398.4(h)(7) unbundled renewable energy credits notwithstanding 399.30(c)(4) of the Public Utilities Code? 398.4(h)(7) unbundled renewable energy credits require a separate listing in CEC's RPS verification to ensure no double counting of environment attributes of renewable generation, and no improper exclusions of retail sales.

RPS compliance verification is not complete without accounting of ownership of environment attributes of renewable generation. WREGIS produced renewable energy credits do not track ownership of environment attributes of renewable generation, and do not ensure there has not been any double counting of environment attributes of renewable generation pursuant to section 399.21 of the Public Utilities Code.

The CEC, by law has access to additional information that has not been considered in verification for any of the RPS compliance periods.

Electric utilities have, through written contracts to derive sales from environment attributes of renewable generation, sold to their retail customers these attributes, and have been required to mail to these customers a power content label each year. RPS prohibits the double counting of these environment attributes of renewable generation.

No adoption of any RPS verification shall be done without verification ownership of environment attributes of renewable generation.

Attached are examples where double counting of environment attributes of renewable generation have not been verified as not occurring.

Steve Uhler  
sau@wwmpd.com