

DOCKETED

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Riverside Public Utilities - Comments on Rulemaking to Amend Regulations Governing the Power Source Disclosure Program

Additional submitted attachment is included below.



February 21, 2024 | [Submitted electronically](#)

California Energy Commission
Docket No. 21-OIR-01
715 P Street
Sacramento, CA 95814-5512

RE: Rulemaking to Amend Regulations Governing the Power Source Disclosure Program

Riverside Public Utilities (“RPU”) is pleased to provide feedback on the pre-rulemaking amendments to the Power Source Disclosure (“PSD”) program released on January 31, 2024.¹ RPU appreciates the opportunity to continue working with California Energy Commission (“CEC”) staff on this program.

RPU fully supports the CEC staff recommendation to remove GHG emissions associated with geothermal resources on the Power Content Label (“PCL”). As RPU stated in its previous communications with CEC staff, the inclusion of fugitive carbon emissions on the PCL associated with CEC-certified renewable geothermal resources is confusing to customers and counter-productive. Geothermal facilities have a well-established reputation for providing clean and sustainable energy within California and have been recognized as certified renewable energy resources by the CEC for many years. The ability of geothermal energy to provide a stable and reliable power source, independent of weather conditions, marks it as a cornerstone for our energy security and sustainability as California continues to strive for a net-zero carbon future.

These proposed revised regulations removing geothermal emissions from the PCL will now accurately align the label with GHG emissions subject to a compliance obligation under section 95852.2 of the Cap-and-Trade MRR. RPU greatly appreciates that the CEC recognizes the importance of aligning these two regulatory paradigms and commends CEC staff for taking this necessary step towards harmonizing these GHG reporting requirements.

RPU is generally supportive of the concurrent comments being submitted by SCPPA and CMUA. More specifically, RPU supports the proposed updated Hourly Accounting rules and the proposed elimination of the “Other Electricity End Uses” category from the revised PCL. RPU is also supportive of a 2025 effective date for changes to the annual PCL reporting requirements.

Respectfully,

Todd Corbin
General Manager

¹ Reference TN #254257 and TN #254272.