

DOCKETED

Docket Number:	21-OIR-01
Project Title:	Rulemaking to Amend Regulations Governing the Power Source Disclosure Program
TN #:	254615
Document Title:	Southern California Public Power Authority Comments on Power Source Disclosure Pre-Rulemaking Amendments
Description:	N/A
Filer:	System
Organization:	Southern California Public Power Authority
Submitter Role:	Public Agency
Submission Date:	2/21/2024 4:30:56 PM
Docketed Date:	2/21/2024

*Comment Received From: Southern California Public Power Authority
Submitted On: 2/21/2024
Docket Number: 21-OIR-01*

SCPPA Comments on Power Source Disclosure Pre-Rulemaking Amendments

Additional submitted attachment is included below.



Southern California Public Power Authority
1160 Nicole Court
Glendora, CA 91740
(626) 793-9364

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

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

RE: Pre-Rulemaking Proposed Amendments to the Power Source Disclosure Program

The Southern California Public Power Authority¹ (“SCPPA”) is pleased to provide feedback on the pre-rulemaking amendments to the Power Source Disclosure Program released on January 31, 2024.² SCPPA appreciates the opportunity to work with CEC staff on this program. As a member of the California Municipal Utilities Association (CMUA), SCPPA supports their written comments, and highlight the following for CEC staff:

- Support for adopting the hourly accounting structure proposed in the Revised Proposed Updates;
- Retail suppliers should be allowed to provide proxy load data;
- Support for technical and administrative clarifications; and
- The importance of having a sufficient opportunity for implementing changes in reporting.

In addition to those comments by CMUA, SCPPA thanks the CEC for their consideration of SCPPA’s request to eliminate GHG emissions associated with geothermal resources on the Power Content Label (PCL).³ SCPPA strongly supports the proposed change in the CEC’s pre-rulemaking amendments to “align the [PCL] with the GHG emissions subject to a compliance obligation under Cap-and-Trade.”⁴ This accommodation for geothermal recognizes the natural occurrence of GHG emissions from geothermal areas, the potential for customer confusion, the nuances of geothermal emissions captured in CARB’s Cap-and-Trade program, and the well-established public policies that promote geothermal procurement. SCPPA is encouraged by this treatment that reflects the unique nature of geothermal resources which do not use combustion to generate electricity, do not emit combustion-related air contaminants, and for which the source of GHGs is part of the natural geothermal resource cycle.

¹ SCPPA is a joint powers authority whose members include the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District. Each Member owns and operates a publicly owned electric utility (POU) governed by a board of local officials. Our Members collectively serve nearly five million people throughout Southern California. Together they deliver electricity to over two million customers throughout Southern California, spanning an area of 7,000 square miles.

² See Pre-Rulemaking Amendments to the Power Source Disclosure Program, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=254257&DocumentContentId=89605>

³ See Southern California Public Power Authority Comments on Rulemaking to Amend PSD Program, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=252711&DocumentContentId=87791>

⁴ See Summary of Changes and FAQs, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=254272&DocumentContentId=89637>

The Members of Southern California Public Power Authority work together to power sustainable communities.





Southern California Public Power Authority
1160 Nicole Court
Glendora, CA 91740
(626) 793-9364

Thank you for the opportunity to provide comments on the Power Source Disclosure Program and for CEC staff's time and attention on these issues.

Natalie Seitzman
Energy Policy Advocate
Southern California Public Power Authority
915 L St., Suite 1410
Sacramento, CA 95814

The Members of Southern California Public Power Authority work together to power sustainable communities.

