

DOCKETED

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Perhaps the CEC should remove WREGIS from the processes for compliance with PSDP and RPS. WREGIS could be replaced by EIA and FERC data which are currently used to certify RECs.

Steve Uhler
sau@wwmpd.com

Additional submitted attachment is included below.

OIR-2021-01 WREGIS does not track electricity products

WREGIS does not track electricity at voltages used at retail, therefore WREGIS does not track electricity as a product as defined by California Court of Appeal, First District, Division 4 in Fong v. Pacific Gas and Electric (1988). Electricity still in the distribution system is a service, not a product.

The Power Source Disclosure Program (PSDP) and the California Renewables Portfolio Standard Program (RPS) require procurement of electricity products to be sourced from eligible renewable energy resources for any renewable energy use claims made.

WREGIS certificates are not the "Renewable energy credit" (REC) that means a certificate of proof associated with the generation of electricity from an eligible renewable energy resource, issued through the accounting system established by the Energy Commission (CEC) pursuant to PUC section 399.25, that one unit of electricity was generated and delivered by an eligible renewable energy resource.

WREGIS does not track legal title to the renewable and environmental attributes of electricity use.

A REC can not be used for PSDP or RPS compliance before it is certified pursuant to PUC section 399.25(a).

Perhaps the CEC should remove WREGIS from the processes for compliance with PSDP and RPS. WREGIS could be replaced by EIA and FERC data which are currently used to certify RECs.

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