

DOCKETED

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CRS Comments on Updates to the RPS Guidebook

Additional submitted attachment is included below.



November 1, 2024

California Energy Commission (CEC)
Docket Unit, MS-4
Docket No. 21-RPS-02
715 P Street, Sacramento, California 95814

RE: COMMENTS OF CENTER FOR RESOURCE SOLUTIONS (CRS) ON RENEWABLE PORTFOLIO STANDARD (RPS) 10TH EDITION GUIDEBOOK UPDATE. DOCKET NO. 21-RPS-02

Dear CEC Staff:

CRS appreciates this opportunity to submit comments in response to the Notice and Request for Comment on Proposed Scope for the RPS Guidebook 10th Edition released October 18th, 2024. Our comments pertain specifically to the inclusion of updated WREGIS account retirement guidelines within the scope of potential updates, as well as other updates that support clearer RPS reporting requirements.

BACKGROUND ON CRS AND GREEN-E®

CRS is a 501(c)(3) nonprofit organization that creates policy and market solutions to advance sustainable energy and has been providing renewable energy and carbon policy analysis and technical assistance to policymakers and other stakeholders in California for over 25 years. CRS also administers the Green-e® programs. For over 25 years, the Green-e® Energy program has been the leading independent certification for voluntary renewable electricity products in North America. In 2022, the Green-e® Energy program certified retail sales of over 114 million megawatt-hours (MWh), serving over 1.3 million retail purchasers of Green-e® certified renewable energy, including over 314,000 businesses.¹

CRS COMMENTS

CRS supports the inclusion of clarifications regarding WREGIS account retirements within the scope of these updates. Addressing this issue is crucial, as the current lack of clarity on RPS reporting and WREGIS retirement requirements is not only impacting Community Choice Aggregators (CCAs) seeking Green Power Partnership (GPP) recognition but also potentially affecting a broad range of entities engaged in renewable energy compliance and certification.

¹ See the 2023 (2022 Data) *Green-e® Verification Report* here for more information: <https://resource-solutions.org/g2023/>.

Ensuring that WREGIS retirement processes are clear and streamlined will support accurate and transparent reporting across the industry. This clarity will reduce administrative burdens, facilitate smoother certification for compliance purposes, and support the overall effectiveness of the RPS framework for all stakeholders. If this issue remains within the scope, CRS looks forward to collaborating with CEC staff on specific updates that could enhance guidance and consistency in RPS reporting requirements.

Thank you for considering our input on this important topic. We look forward to contributing to further discussions that strengthen California's renewable energy policies and reporting mechanisms.

Sincerely,
Lucas Grimes
Manager, Policy