

DOCKETED

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Power source disclosure regulations depend on the accounting system in the RPS guidebook. That guidebook is being revised in docket 21-RPS-02.

Postpone rulemaking until RPS guidebook is adopted to ensure CEC's use of renewable energy credits agree with EPA's standards.

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Additional submitted attachment is included below.

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The EPA's comment in 21-RPS-02

<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=21-RPS-02>, US EPA Green Power Partnership Comments on Proposed Scope for the RPS Guidebook TN259858

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=259858> points out that voluntary and compliance use of renewable energy credits need to be accounted separately. No double counting.

The EPA points out: "Per the CPUC's Decision Memo 17-06-026, 'RECs retired for RPS compliance may be used for no purposes other than RPS compliance' (pg. 35).",

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M191/K530/191530416.PDF#page=37>.

"The U.S. EPA recognizes voluntary green power as renewable electricity that is surplus to regulation and retired for voluntary purposes."

The EPA says: "Overall, we suggest clarifying all RECs retired in an LSE's RPS subaccount are only for RPS compliance. If an LSE retires more RECs than required for CA RPS compliance, these surplus RECs should not be marketed to the LSE's customers as an incremental or voluntary green power."

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