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| Project Title: | Rulemaking to Amend Regulations Governing the Power Source Disclosure Program |
| TN #: | 260704 |
| Document Title: | Staff Correspondence with Shelby Kitt, Powerex, 12-17-24 |
| Description: | N/A |
| Filer: | Logan Clendening |
| Organization: | California Energy Commission |
| Submitter Role: | Commission Staff |
| Submission Date: | 12/18/2024 12:54:35 PM |
| Docketed Date: | 12/18/2024 |

Clendening, Logan@Energy

From: Energy - psdprogram <psdprogram@energy.ca.gov>
Sent: Tuesday, December 17, 2024 10:41 AM
To: Kitt, Shelby
Subject: Re: Question about the Power Source Disclosure rulemaking

Hi Shelby,

Thank you for reaching out, and let me know if there are any other questions that arise. I appreciate that feedback and will pass it on to Jordan when he's back in the office.

Best,

Logan Clendening

Power Source Disclosure Unit
Energy Assessments Division



From: Kitt, Shelby <Shelby.Kitt@powerex.com>
Sent: Tuesday, December 17, 2024 9:12 AM
To: Energy - psdprogram <psdprogram@energy.ca.gov>
Subject: RE: Question about the Power Source Disclosure rulemaking

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Hi Logan,

Thanks again for clarifying this with me yesterday (and over the phone).

We are not intending on submitting comments, but informally I wanted to give the feedback that I think the rules could benefit from adding this clarity that you provided for me. I understood how these 3 factors play into the emissions *intensity* for annual unspecified power (revised section 1392 (b)(4)) but it wasn't clear that these would also be used to calculate the % for the unspecified source categories. Possibly a minor addition that could improve clarity.

Thanks, have a great day

Shelby Kitt

Market Policy Analyst | Powerex Corp.
1300 - 666 Burrard Street | Vancouver, BC | V6C 2X8
Cell 778.893.4448



From: Energy - psdprogram <psdprogram@energy.ca.gov>
Sent: Monday, December 16, 2024 12:20 PM
To: Kitt, Shelby <Shelby.Kitt@powerex.com>
Subject: Re: Question about the Power Source Disclosure rulemaking



Hello Shelby,

Jordan is out of the office until Wednesday, but I can help with answering your questions. Among the proposals in the Power Source Disclosure rulemaking are the following two points:

- 1) PSD is proposing to group all resources on the power content label into two larger supercategories, either **fossil fuels** or **renewables and zero-carbon resources**, and to display that information in pie charts as shown in this [sample PCL](#).
- 2) PSD is also proposing to calculate and display on the PCL the percentage of fossil fuels or renewables and zero-carbon resources that comprised unspecified power.

To determine the percentage of unspecified power that came from these two supercategories, the PSD program is proposing to use three data points:

- 1) Annual in-state natural gas generation that retail suppliers did not purchase as a specified resource through an existing contract. This in-state gas is presumed to be sold on the open market to meet marginal retail demand.
- 2) Annual unspecified imports (presumed to be all fossil fuels).
- 3) Oversupply, which is specified generation reported by retail suppliers in excess of their total load and losses. This excess generation is presumed to help meet the demand of other retail suppliers that relied on unspecified power.

PSD would use QFER data to determine unclaimed in-state gas and unspecified imports, and would use PSD annual reports to determine oversupply.

Please let me know if you have any follow-up questions. I'm available for a phone call anytime after 1 pm today at the number below.

Best,

Logan Clendening
Power Source Disclosure Unit
Energy Assessments Division
916-805-7439



From: Kitt, Shelby <Shelby.Kitt@powerex.com>
Sent: Friday, December 13, 2024 10:11 AM
To: Energy - psdprogram <psdprogram@energy.ca.gov>
Subject: Question about the Power Source Disclosure rulemaking

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Hello,

I just left a voicemail with Jordan Scavo but following up here – I’m a policy analyst with Powerex and I have a question about the Power Source Disclosure rulemaking that I’m hoping I could get some insights on.

Specifically, I’m wondering about the proposal to display information on the PCL about *“whether the unspecified power was provided primarily by “fossil fuels” or “renewables and zero-carbon resources”*

I’m trying to make sure I understand how this would work, and where this information would come from.

Thank you in advance! I am available to talk any time this afternoon or next week. My number is below or please let me know if there is a time that would work for me to call back.

Shelby Kitt

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