CalWEA

California Wind Energy Association

September 6, 2017

California Energy Commission
Docket No. 16-OIR-05
Docket Office
1516 Ninth Street
Sacramento CA 95814

Submitted Electronically via CEC website to Docket 16-OIR-05

Re: Comments on Assembly Bill 1110 Implementation Proposal for Power Source Disclosure

The California Wind Energy Association (CalWEA) offers these brief comments on the Staff Draft Paper "Assembly Bill 1110 Implementation Proposal for Power Source Disclosure" (Staff Draft Proposal). We hope that our comments will be considered despite being filed after the established written comment period, given that the rulemaking is still in the pre-rulemaking phase.

CalWEA supports the Staff Draft Proposal's proposed treatment of unbundled renewable energy credits (RECs). CalWEA is one of the earliest champions of California's Renewables Portfolio Standard (RPS), including the tradable RECs system that is used for RPS compliance. However, we agree that RPS rules are not appropriate for application to Power Content Labels because RECs do not represent actual delivered energy, and because RPS compliance does not occur on an annual basis.

While we are supportive of the Staff Draft Proposal, we nevertheless strongly encourage the Commission to develop a more robust emissions accounting methodology that will more closely reflect the resources that are actually used to meet each load-serving entity's (LSE) load. In early-filed comments, PG&E presented just such a methodology. CalWEA agrees with PG&E that its proposed "Clean Net Short" methodology would more closely conform to the requirements of AB 1110 (Public Utilities Code 398.1(b)), which requires "simple to understand information on the sources of energy, and the associated emissions of greenhouse gases, that are *used to provide electric service*." (Emphasis added.)

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A significant and growing fraction of California's population has a choice of electricity providers. The exercise of that choice will have an impact on the state's greenhouse gas (GHG) emissions and its related policy goals. The Commission must therefore strive to ensure that customers' decisions are accurately informed, and that the sum of all LSE Power Content Labels matches the Air Resources Board's accounting of emissions.

PG&E's proposed methodology would properly account for the GHG emissions associated with the sources of energy actually used to serve each LSE's load on an hourly basis. In turn, this will encourage LSEs to assemble balanced renewable energy portfolios that match their loads, rather than relying on paper transactions that are often disconnected from serving those loads. Weaning California's electricity system off of fossil fuels will require all LSEs to work towards physically serving their loads with renewable energy.

For these reasons, we strongly support PG&E's proposal and encourage the Commission to give it careful consideration.

Sincerely,

/s/
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Executive Director
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