



October 23, 2023

California Energy Commission  
Docket Unit, MS-4  
Docket No. 21-OIR-01  
715 P Street, Sacramento, California 95814

**RE: COMMENTS OF CENTER FOR RESOURCE SOLUTIONS (CRS) ON RULEMAKING TO AMEND REGULATIONS GOVERNING THE POWER SOURCE DISCLOSURE PROGRAM**

Dear CEC Staff:

CRS appreciates this opportunity to submit comments in response to the Rulemaking to Amend Regulations Governing the Power Source Disclosure (PSD) Program. Our comments pertain specifically to supporting the changes to the annual reporting requirements and keeping those requirements separate from hourly reporting. Our comments also provide information about how to communicate with stakeholders regarding these changes to the PSD program.

**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 20 years. CRS also administers the Greene® programs. For over 20 years, the Green-e® program has been the leading independent certification for voluntary renewable electricity products in North America. In 2021, the Green-e® Energy program certified retail sales of over 110 million megawatt-hours (MWh), serving over 1.3 million retail purchasers of Green-e® certified renewable energy, including over 309,000 businesses.<sup>1</sup>

**CRS COMMENTS**

**1. Support for Separating Hourly and Annual Reporting**

CRS supports the staff proposal for separating hourly and annual data, and maintaining the annual basis for the Power Content Label (PCL). This approach is crucial for consumer transparency and comparability. As stated in the Staff proposal, “annual data will remain the basis for the power content

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<sup>1</sup> See the 2022 (2021 Data) Green-e® Verification Report (soon to be published) here for more information: <https://www.greene.org/verification-reports>

label, the consumer information tool that allows customers to compare electric services.”<sup>2</sup> This distinction is essential for consumers to make informed choices about their electricity providers.

## 2. Additional Disclosure Under SB 1158<sup>3</sup>

To avoid consumer confusion and to enable electricity customers to understand the differences between different GHG emissions reporting in California and effectively use this information make decisions about their own use, including the time of use as well as choice of suppliers and retail product/portfolio (where available), the GHG reporting required by SB 1158 can be accompanied by the following information.

- a. An explanation of the differences between the following electricity and GHG emissions reporting/information in California:

<b>Name</b>	<b>Agency</b>	<b>Timeframe</b>	<b>Historical/ projected</b>	<b>Scope</b>	<b>Generation included</b>	<b>Transactions included</b>
<i>RPS RE percentage</i>	CPUC & CEC	<i>Multi-year</i>	<i>Historical</i>	<i>Supplier-specific</i>	<i>Percentage of the generation sold to retail customers</i>	<i>All transactions of power and generation attributes; includes firmed and shaped RE and ≤ 10% unbundled REC procurements</i>
<i>IRP GHG targets</i>	CPUC & CEC	<i>Annual planning, Hourly accounting of emissions for IOUs</i>	<i>Projected based on utility modeling</i>	<i>Supplier-specific</i>	<i>GHG target for generation owned and purchased by suppliers to physically serve/support retail load</i>	<i>Transactions of power but not generation attributes</i>
<i>PSD GHG intensity</i>	CEC	<i>Annual</i>	<i>Historical</i>	<i>Retail Product/Portfolio-specific</i>	<i>GHG emissions intensity/rate of generation sold to retail customers (contractual</i>	<i>All transactions of power and generation attributes except firmed and shaped RE and unbundled REC procurements</i>

<sup>2</sup> California Energy Commission. STAFF REPORT. Power Source Disclosure Proposals on Hourly and Annual Accounting (pg. 1) (Sept 2023). Available at <https://www.energy.ca.gov/event/workshop/2023-09/staff-pre-rulemaking-workshop-updates-power-source-disclosure-regulations>

<sup>3</sup> Acronyms CARB: California Air Resources Board CEC: California Energy Commission CPUC: California Public Utilities Commission GHG: Greenhouse Gas IOU: Investor-owned Utility IRP: Integrated Resource Planning PSD: Power Source Disclosure MRR: Mandatory Reporting Regulation RE: Renewable Energy REC: Renewable Energy Certificate RPS: Renewable Portfolio Standard

					<i>delivery to retail customers)</i>	
<i>MRR GHG emissions</i>	CARB	<i>Annual</i>	<i>Historical</i>	<i>Generator /importer-specific and statewide</i>	<i>Source GHG emissions from instate generators and out-of-state generation imported to physically serve/support state load</i>	<i>Transactions of power to the state but not generation attributes</i>

- b. An explanation of how the GHG reporting required by this bill relates to the GHG emissions reporting above. For example:

This hourly GHG information is intended to be used by customers differently than other GHG information provided by the state, which helps explain the hourly format. Customers can use this new information to help make hourly load management decisions, e.g., shifting electricity consumption to a different time of day, when to charge an electric vehicle, to create emissions benefits. Customers should use RPS and PSD information to make decisions regarding suppliers and the generation they purchase to create emissions benefits. Customers can use CARB's MRR statewide emissions information to evaluate emissions from the state's electricity sector overall.

In addition, suppliers can provide a weighted average annual total of the GHG emissions reported per this bill (SB 1158 GHG emissions) to allow customers to compare it to the PSD GHG intensity, with the context of the differences in calculation methodology.

<b>Name</b>	<b>Agency</b>	<b>Timeframe</b>	<b>Historical/ projected</b>	<b>Scope</b>	<b>Generation included</b>	<b>Transactions included</b>
<i>SB 1158 GHG emissions</i>	CEC	Hourly	<i>Historical</i>	<i>Supplier-specific</i>	<i>GHG emissions from generation used by suppliers to physically serve/support retail load</i>	<i>Transactions of power but not attributes</i>

- c. Additional informational resources, including:
- i. The full methodologies and regulatory text for each emissions total/reporting above.

- ii. General information on different types of RE and GHG emissions accounting frameworks (CRS can contribute resources).

Sincerely,

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Lucas Grimes  
Manager, Policy