

DOCKETED

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SFPUC Comments on CEC 2nd 15-Day Package - ATTACHMENT 2

This is ATTACHMENT 2 to the SFPUC Comments on CEC 2nd 15-Day Comment Package

Additional submitted attachment is included below.

SFPUC Comments on CEC RPS Rulemaking

Submitted September 2, 2020

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ATTACHMENT 2

RECOMMENDED CHANGES TO FINAL STATEMENT OF REASONS

Section 3204 (b)(9)(B)3.i – This subdivision was added to clarify the definition of “monetized” for purposes of this RPS retail sales reduction and is based on the plain meaning of “monetize.” This definition does not preclude the use of the RECs retired on behalf of participating customers in CARB’s Voluntary Renewable Electricity Program, as the program currently exists, to substantiate emissions reductions claims on behalf of those customers. This definition also would not preclude participation in either a community solar program pursuant to Title 24, Part 1, section 10-115, of the California Code of Regulations, as the regulations currently exist, or participation in CARB’s Low Carbon Fuel Standard (LCFS) program, as it currently exists, assuming all other requirements are satisfied.

~~This definition would preclude a POU from retiring RECs on behalf of the participating customer for both the RPS retail sales reduction and participation in CARB’s Low Carbon Fuel Standard (LCFS) program, as it currently exists. RECs retired for purposes of the current LCFS are used to substantiate claims of low carbon electricity and factor into the determination of LCFS credits, which have a monetary value accrued to a specific entity and represent a further monetization of retired RECs.~~

This addition is necessary to clarify and provide guidance to POUs on how the CEC will interpret “monetized” when assessing a POU’s procurement actions to reduce its retail sales.