

Steve [REDACTED]'s Report and recommendations on alternatives to the rate schedule changes and additions proposed by SMUD general manager.

Subject: SSR rate schedule, Renewable Energy Credit ownership, and burden to other SMUD customers.

This report is submitted pursuant to Public Utilities Code section 14403.5(b).

SMUD rates staff have made this reply to my example below: "Yes, assuming the metering complies with WREGIS requirements. Additional equipment installed by a customer is the responsibility of that customer to ensure compliance."

My example: "The PV/storage installation would be compliant with Title 24, JA11. The metering would comply with JA11.5.1 Remote Monitoring Capability and have a read tolerance of +/-0.5% and provide real-time data pursuant to JA11.5.1(f). The renewable energy credits would be based on the JA11.5.1 metering that meets WREGIS metering requirements. The SMUD meter would be billing and crediting for only the energy (null power)."

The SSR rate schedule states a renewable electrical generation facility is a facility that is eligible for certification as a renewable energy resource as defined by the California Energy Resources Conservation and Development Commission (CEC). See the CEC's most current Renewable Portfolio Standard (RPS) Eligibility Guidebook for the purposes of providing the technical definitions of a renewable electrical generation facility.

A facility shall be registered and approved in WREGIS and RPS Online systems before the Energy Commission will approve an application for certification.

The customer may Self-Report generation as Classes I or J, or use a Small-Scale Aggregator. This will allow the customer to keep legal title to the renewable energy credits (RECs).

Do customers that wish to be on the SSR rate, have to register and in WREGIS and RPS Online System before SMUD will allow enrollment in the SSR rate schedule?

Can a customer PV/storage system that is registered and approved in WREGIS, and is eligible for certification as a renewable energy resource as defined by the CEC, but the customer does not apply for certification from the CEC, be on the SSR rate?

If a customer that wishes to be on the SSR rate schedule does not want their PV/storage facility registered with WREGIS and RPS Online

systems, will SMUD respect their wishes and not register their facility with WREGIS and RPS Online systems?

Null power is renewable sourced electricity that has the renewable energy credits stripped off. Null power has no renewable energy attributes, credits or rights to claim renewable energy use. Null power can't be claimed as renewable energy in calculating for RPS compliance.

Will the SMUD meter billing and crediting for customers on the SSR rate schedule, be for only the energy as null power?

If not, what how much will SMUD pay the SSR rate schedule customer to obtain legal title to each REC?

In either case, other customers will be burdened with the cost of the renewable energy credits required to comply with RPS for the null power SMUD receives from such a customer on the SSR rate schedule.

My recommendations are to clearly state in the SSR rate schedule, REC ownership and that a customer with such a facility shall transfer legal title for RECs at no cost to SMUD so other customers will not be burdened.

Perhaps SMUD staff have overlooked posting all of my comments on [Rate change public comments](#)?

Attached are the email comments and staff replies related to the GM report, between myself and ContactUs@smud.org, rates@smud.org, and CustSvc@smud.org.

SMUD board, please ask SMUD staff to answer my questions at the public hearing so the public can comment about my report at the hearing before action is taken.

I thank the SMUD board for considering at the Tuesday, August 31, 2021 Public Hearing, my report and recommendations submitted in writing on alternatives to the rate changes proposed by the general manager, pursuant to Public Utilities Code section 14403.5(b).

I look forward to commenting after hearing staff rebuttal and SMUD board's consideration of my report, before any action is taken by the SMUD board at the Public Hearing.

thanks,

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