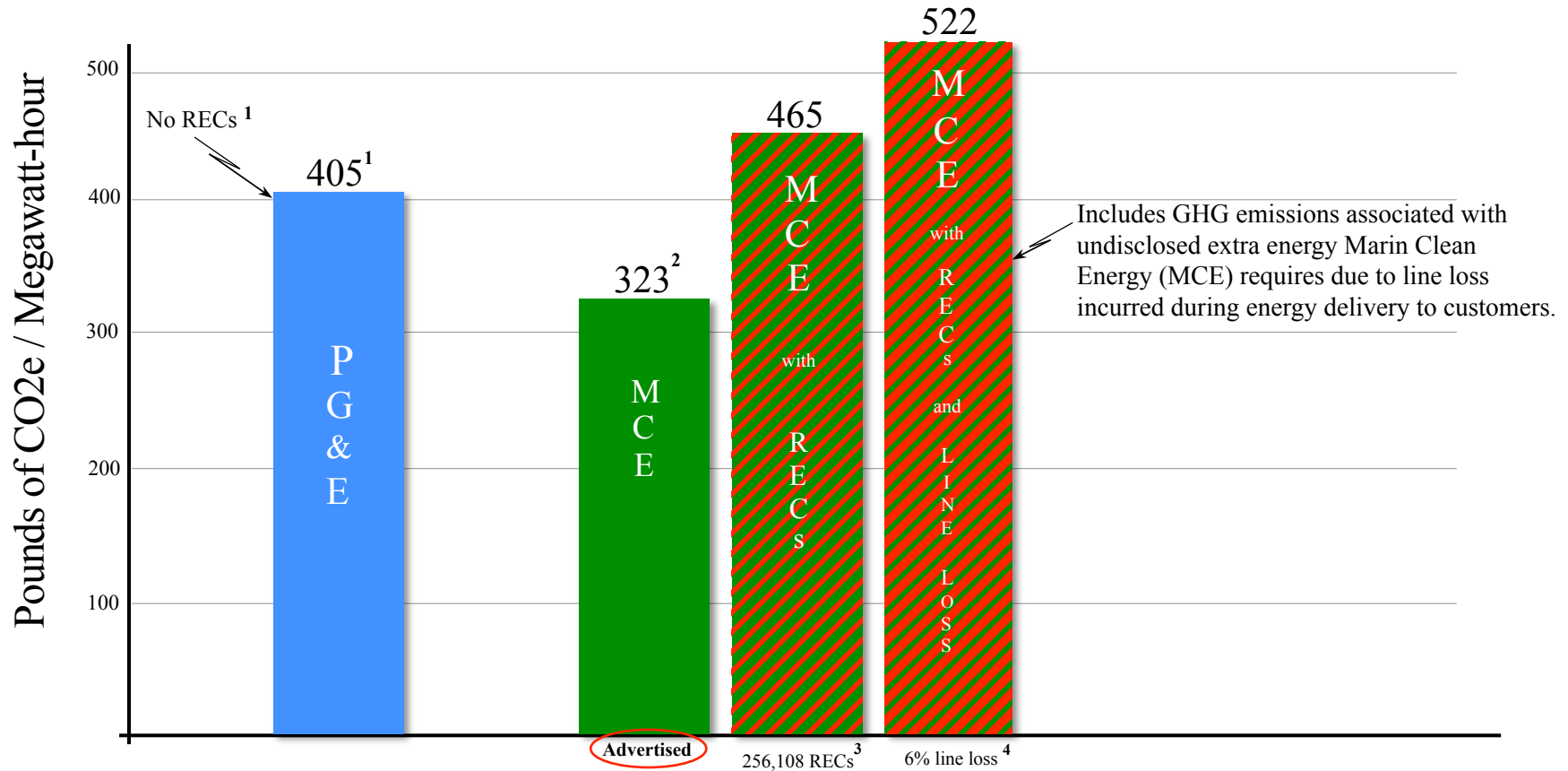


# 2015 *actual* Greenhouse Gas (GHG) Emission Rate

Includes emissions associated with unbundled renewable energy certificates (RECs) and line loss



<sup>1</sup> <http://www.pgecurrents.com/2017/02/09/pge-cuts-carbon-emissions-with-clean-energy-2/>

<sup>2</sup> MCE May 18, 2017 Board Agenda, Item #06: "UNDERSTANDING MCE'S GHG EMISSION FACTORS – CALENDAR YEAR 2015," page 1.

<sup>3</sup> 256,108 RECs found on Schedule 1 of MCE's Power Source Disclosure Report for CY 2015, filed with California Energy Commission. This contrasts with MCE's issued-for-public-consumption "UNDERSTANDING MCE'S GHG EMISSION FACTORS – CY2015," dated May 18, 2015, which omits (transparent) reference to "RECs" and "unbundled RECs" (aka "PCC3," "Type 3," or "Bucket 3").

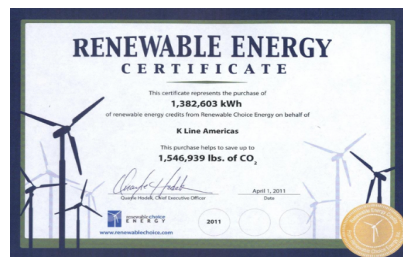
<sup>4</sup> MCE Integrated Resource Plan for 2015 (Approved by Board of Directors 10/15/15), p. 33 of 33, Appendix A-1: Load and Resource Tables identifies Retail Load at 1,672 (GWh), plus *Distribution Line Losses and Unaccounted For Energy* = 100 (GWh). Total Energy Requirements = 1,773 (sic) GWh. 100/1,672 = 6% Line Loss.

# Green-washing with RECs

Same power from “Grid” (electric system)



dirty power



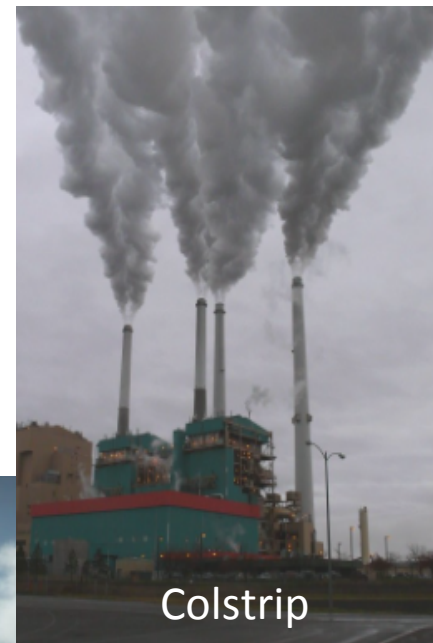
MCE adds REC



local community

Same power but MCE tells you it's “clean.”

# MCE's "clean" delivered energy (coal & nuclear)



**PROPOSED ANNUAL REPORT TO THE CALIFORNIA ENERGY COMMISSION: Power Source Disclosure Program**  
June 2016

**For the Year Ending December 31, 2015**  
**SCHEDULE 1: RETAIL SALES**  
**Applicable to: Load Serving Entities**

**MCE**

**ALL PROCUREMENTS (Specified and Unspecified)**

Facility Name	Unit Number	Fuel Type	Location (State or Province)	WREGIS GU ID	EIA ID	CEC Plant ID	FERC QF ID	Gross kWh Procured
Camp Reed Wind Park (REC Only)		Wind	ID	W1875				2500000
Campbell Hill (REC Only)		Wind	WY	W1383				38737000
Double A Dairy Digester - AgPower Jerome, LLC (REC Only)		Biogas	ID	W2775				7,220,000
Dunlap 1 (REC Only)	1	Wind	WY	W1687				3,766,000
Glenrock I (REC Only)		Wind	WY	W964				2,902,000
Glenrock III (REC Only)		Wind	WY	W965				1,075,000
Goodnoe Hills (REC Only)		Wind	WA	W536				804,000
High Plains (REC Only)		Wind	WY	W1334				3,000,000
Leaning Juniper I (REC Only)		Wind	OR	W200				4,346,000
Lower Snake River (LSR) - Phalen Gulch (REC Only)		Wind	WA	W2670				2,700,000
Marengo (REC Only)		Wind	WA	W185				2,202,000
Marengo II (REC Only)		Wind	WA	W772				1,070,000
2McFadden Ridge (REC Only)		Wind	WY	W1341				1,074,000
Meadow Creek Wind Farm - Five Pine Project (REC Only)		Wind	ID	W3186				13,517,000
Meadow Creek Wind Farm - North Point Wind Farm (REC Only)		Wind	ID	W3185				96,977,000
Meadow Creek Wind Farm - Pine Project (REC Only)		Wind	ID	W3186				14,506,000
Mountain Air Wind Projects (REC Only)		Wind	ID	W2869				13,391,000
Nine Canyon Phase 3 (REC Only)		Wind	WA	W697				4,167,000
Rising Tree Wind Farm LLC (REC Only)		Wind	CA	W4444				2,071,000
Rising Tree Wind Farm II LLC (REC Only)		Wind	CA	W4445				605,000
Rolling Hills (REC Only)		Wind	WY	W928				217,000
Salmon Falls Wind Park (REC Only)		Wind	ID	W1885				3,727,000
Seven Mile Hill I (REC Only)		Wind	WY	W975				3,113,000
Seven Mile Hill II (REC Only)		Wind	WY	W976				1,004,000
Top of the World (REC Only)		Wind	WY	W1749				7,447,000
Wild Horse (REC Only)		Wind	WA	W183				17,574,000
Wolverine Creek (REC Only)		Wind	ID	W188				2,064,000
Yahoo Creek Wind Park (REC Only)		Wind	ID	W1874				4,332,000
Cedar Creek		Wind	CO	W892				50000000
City of Corcoran Solar		PV Solar	CA	W4150				20,772,000
Corona - MWD Corona		Small Hydro	CA	W471				12,785,000
Calpine Delta Energy Center		Natural Gas	CA		55333	G0783		194,185,000
Diamond Valley Lake Hydroelectric Plant - MWD DVL		Small Hydro	CA	W1287				7,298,000

## Mary Nichols, Chair of California Air Resources Board

----- Original Message -----

**From:** Nichols, Mary D. @ARB

**To:** [Jim Phelps](#)

**Sent:** Tuesday, December 10, 2013 9:49 AM

**Subject:** Re: No-burn day solution

Whatever they are doing, it has nothing to do with AB32 or air regulations **it may be consumer fraud**, but that's not my jurisdiction.

Sent from my ARB iPhone

----- Original Message -----

**From:** [Jim Phelps](#)

**To:** [Nichols, Mary D. @ARB](#)

**Sent:** Tuesday, December 10, 2013 9:45 AM

**Subject:** Re: No-burn day solution

Hi Mary --

I am confused and would appreciate your clarification. You write that REC's in California are not used for GHGs. However, **the use of REC's is exactly how our local clean energy company "out-greens" everyone**. For instance, the clean energy company waits for PG&E to declare its annual emission rate, then the company purchases applicable vintage REC's and retroactively retires them in order to report a lower-than-PG&E emission rate. The clean energy company reports those retroactive REC's rather than the actual system power that it purchases for consumers. The clean energy folks refer to this process as a "true-up."

Am I missing something?

Thanks,  
Jim Phelps