

From: Allen, Meredith
Sent: 12/13/2010 9:04:32 AM
To: 'Schwartz, Andrew' (as2@cpuc.ca.gov); Murtishaw, Scott (sgm@cpuc.ca.gov)
Cc:
Bcc:
Subject: Renewables GHG: Reg Language & Customer Cost Impact - \$125 million

Andy, Scott,

Below is language that we believe should be included in the Mandatory Reporting Regulation to address the issues that we discussed last week. Additional clean up would also be needed but the primary concept is below.

Also, if PG&E's CPUC approved contracts are not granted this treatment, it would result in **\$125 million** in additional costs for renewables out-of-state purchases between 2012 and 2020. This amount does not include the contracts that are pending approval. This calculation uses 0.436 ton/MWh assumption per CARB staff guidance and \$30/ton allowance price.

Please let me know if you need additional information.

Thanks,
Meredith

8) Renewable Electricity Imports. Electricity imported and matched via a NERC e-tag with a WREGIS certificate will be considered specified imports from the eligible renewable energy resource identified in the WREGIS certificate. The electricity importer will show ownership of the WREGIS certificate and that such certificate is matched with a NERC e-tag documenting delivery of electricity into California.