



**DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT & TOURISM**

DAVID Y. IGE
GOVERNOR
MIKE MCCARTNEY
DIRECTOR
CHUNG I. CHANG
DEPUTY DIRECTOR

No. 1 Capitol District Building, 250 South Hotel Street, 5th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804
Web site: dbedt.hawaii.gov

Telephone: (808) 586-2355
Fax: (808) 586-2377

Statement of
MIKE MCCARTNEY
Director

Department of Business, Economic Development, and Tourism
before the

SENATE COMMITTEE ON ENERGY, ECONOMIC DEVELOPMENT, AND TOURISM

Monday, March 14, 2022
3:00 PM

State Capitol, Conference Room #224 & Videoconference

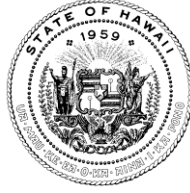
In consideration of
HB2089, HD1
RELATING TO RENEWABLE PORTFOLIO STANDARDS.

Chair Wakai, Vice Chair Misalucha, and members of the Committee.

The Department of Business, Economic Development and Tourism (DBEDT) strongly supports this Administrative measure, HB2089, HD1, that amends the definition of renewable portfolio standard to be a percentage of electrical energy generation, rather than sales.

This bill will simplify the calculation, using renewable generation in the numerator and total generation in the denominator and allow the results of the calculation (the math) to better match Hawai'i's stated energy goal (the language).

Thank you for the opportunity to testify.



DAVID Y. IGE
GOVERNOR

JOSH GREEN
LT. GOVERNOR

**STATE OF HAWAII
OFFICE OF THE DIRECTOR
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS**

335 MERCHANT STREET, ROOM 310
P.O. BOX 541
HONOLULU, HAWAII 96809
Phone Number: 586-2850
Fax Number: 586-2856
cca.hawaii.gov

CATHERINE P. AWAKUNI COLÓN
DIRECTOR

JO ANN M. UCHIDA TAKEUCHI
DEPUTY DIRECTOR

Testimony of the Department of Commerce and Consumer Affairs

**Before the
House Committee on Energy, Economic Development, and Tourism
Monday, March 14, 2022
3:00 PM
Conference Room 224 & Videoconference**

**On the following measure:
H.B. 2089, HD1, RELATING TO RENEWABLE PORTFOLIO STANDARDS**

Chair Wakai and Members of the Committee:

My name is Dean Nishina, and I am the Executive Director of the Department of Commerce and Consumer Affairs' (Department) Division of Consumer Advocacy. The Department supports this bill.

The purpose of this bill is to amend the definition of "renewable portfolio standard" to be a percentage of electrical energy generation, rather than sales, excluding customer-sited fossil fuel generation; and, to expand the events or circumstances that are beyond an electric utility company's reasonable control to include non-renewable energy generated by electric generation facilities over or of which the electric utility does not have direct control or ownership.

This HD1 version amends the bill by excluding customer-sited, grid-connected fossil fuel generation from the definition of "renewable portfolio standard", and by expanding the events or circumstances that are beyond an electric utility company's reasonable control to include non-renewable energy generated by electric generation

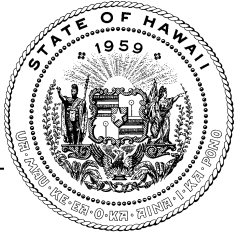
facilities over which or of which the electric utility company does not have direct control or ownership.

The Department continues to support the State's goal of 100% renewable energy on its electric grids by 2045, and so the Department supports the proposal to modify the existing Renewable Portfolio Standards (RPS) calculation in Hawaii Revised Statutes (HRS) section 269-91 by replacing "sales" with "generation" in the calculation, effective July 1, 2022. This modification will eliminate the existing "loophole" that could allow the State to achieve a 100% RPS but still have a significant contribution from fossil-fueled generation sources, as well as suggest that more than 100% of generation is from renewable energy.

The Department notes how this bill modifies the calculation of the interim 2030 and 2040 calculations and offers that, when the RPS calculation is modified, the corrected calculation will automatically require more grid-connected renewable energy than is currently required.

The Department notes that proposed subsection (e) requires electric utility companies to report data and trends relating to customer retention or attrition. The Department supports the notion of tracking such data and trends but adding the proposed reporting to another section of HRS 269 may be more appropriate.

Thank you for the opportunity to testify on this bill.



HAWAII STATE ENERGY OFFICE STATE OF HAWAII

DAVID Y. IGE
GOVERNOR

SCOTT J. GLENN
CHIEF ENERGY OFFICER

235 South Beretania Street, 5th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-3807
Web: energy.hawaii.gov

Testimony of
SCOTT J. GLENN, Chief Energy Officer

before the
SENATE COMMITTEE ON ENERGY, ECONOMIC DEVELOPMENT, AND TOURISM

Monday, March 14, 2022
3:00 PM
State Capitol, Conference Room 224 & Videoconference

**SUPPORT
HB 2089, HD1
RELATING TO RENEWABLE PORTFOLIO STANDARDS.**

Chair Wakai, Vice Chair Misalucha, and Members of the Committee, the Hawai'i State Energy Office (HSEO) strongly supports HB 2089, HD1, an Administration measure, which amends the definition of "renewable portfolio standard" to be a percentage of electrical energy generation, rather than sales. It clarifies that customer-sited fossil fuel generation is beyond an electric utility company's reasonable control.

HSEO finds that HD1 acknowledges the importance of activities and policies beyond those of the utility, while clarifying and increasing the statutory renewable energy requirements applicable to Hawai'i's electric utilities after 2030.

Importantly, the bill allows the law's existing provisions for necessary adjustment by the Public Utilities Commission, including adjustments of requirements, and penalties and incentives, to remain in place.

It has been generally understood for several years that the calculation should and must change to be consistent with public understanding, Hawai'i's policies (including the enactment in 2018 of Hawai'i's carbon net negative goal),¹ and increasing concerns over continued reliance on imported fossil fuels.

Making this change now, just after completing the 2020 milestone and several years in advance of the 2030 milestone, gives a greater degree of clarity and certainty

¹ [Section 225P-5, Hawai'i Revised Statutes.](#)

to Hawai'i's electric utilities, as well as to the public, regarding Hawai'i's "100% renewable" objective.

It is important that we make this change at this time. As noted in the bill, it would be possible to reach the "100 per cent renewable portfolio standard" (with the current definition, based on sales) with only 79 per cent of Hawai'i's electricity produced from renewable sources and the other 21 per cent still generated from fossil fuel.

When the original version of the renewable portfolio standards law was enacted, over twenty years ago, there were several competing objectives that led to the bill language as it exists today, in which a formula is used to calculate the renewable energy percentage in a way that does not accurately capture the amount of renewable energy on the system and allows for greater use of fossil fuels. HSEO believes that the more intuitively correct approach to the RPS calculation, in addition to numerous policies, incentives, requirements, and other constraints, will together accelerate the reduction in the use of fossil fuels to generate electricity in Hawai'i.

I thank the Committee for hearing this bill and respectfully request your approval of it.

Thank you for the opportunity to testify.

TESTIMONY OF
JAMES P. GRIFFIN, Ph.D.
CHAIR, PUBLIC UTILITIES COMMISSION
STATE OF HAWAII

TO THE
SENATE COMMITTEE ON
ENERGY, ECONOMIC DEVELOPMENT, AND TOURISM

March 14, 2022
3:00 p.m.

Chair Wakai and Members of the Committee:

MEASURE: H.B. No. 2089, HD1

TITLE: RELATING TO RENEWABLE PORTFOLIO STANDARDS.

DESCRIPTION: Amends the definition of "renewable portfolio standard" to be a percentage of electrical energy generation, rather than sales, excluding customer-sited fossil fuel generation. Expands the events or circumstances that are beyond an electric utility company's reasonable control to include non-renewable energy generated by electric generation facilities over or of which the electric utility does not have direct control or ownership. Effective 7/1/2100. (HD1)

POSITION:

The Public Utilities Commission ("Commission") supports this administration measure and offers the following comments for consideration.

COMMENTS:

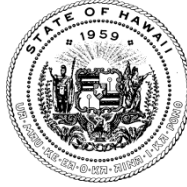
The Commission believes that calculating renewable portfolio standard ("RPS") achievement in the manner proposed by this measure will present a more accurate picture of how much of the state's electricity is produced from renewable energy sources, ensuring alignment with the intent of the renewable portfolio standards goals.

The definition proposed in this measure is consistent with the RPS achievement performance incentive mechanism for Hawaiian Electric ("RPS-A PIM") under the performance-based regulation framework, which is calculated as the total system renewable generation divided by total generation of electricity.

The Commission notes that expressing RPS requirements in terms of electricity generation rather than utility sales will require a higher level of renewable generation to achieve the same target level. The Commission will continue to support renewable energy efforts and create a regulatory environment that facilitates achievement of the State's energy goals.

Thank you for the opportunity to testify on this measure.

DAVID Y. IGE
GOVERNOR



TESTIMONY BY:

JADE T. BUTAY
DIRECTOR

Deputy Directors
ROSS M. HIGASHI
EDUARDO P. MANGLALLAN
PATRICK H. MCCAIN
EDWIN H. SNIFFEN

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

March 14, 2022
3:00 p.m.
State Capitol, Teleconference

H.B. 2089, H.D. 1
RELATING TO RENEWABLE PORTFOLIO STANDARDS.

Senate Committee on Energy, Economic, Development and Tourism

The Department of Transportation (DOT) **supports** this Administration bill to amend the renewable portfolio standard (RPS) definition to more accurately reflect the amount of renewable energy generation in Hawaii by amending the RPS calculation to be based on electrical energy generation as opposed to electrical energy sales.

By accurately defining the RPS, the Legislature will ensure that the intent of Act 97(15) is met; namely, to establish a one hundred per cent renewable portfolio standard by 2045 in order to transition the State away from imported fuels and toward renewable local resources. This further supports DOT's pursuit of clean energy in the transportation sector. In particular, it supports the cost-effective electrification of transportation using indigenous renewable resources while simultaneously helping to reduce our State's carbon pollution.

Thank you for the opportunity to provide testimony.



To: The Senate Committee on Energy, Economic Development and Tourism
From: Sherry Pollack, Co-Founder, 350Hawaii.org
Date: Monday, March 14, 2022, 3pm

In support of HB2089 HD1

Aloha Chair Wakai, Vice Chair Misalucha, and Committee members,

I am Co-Founder of the Hawaii chapter of 350.org, the largest international organization dedicated to fighting climate change. 350Hawaii.org is in **support of HB2089 HD1** which would amend the renewable portfolio standard (RPS) to more accurately reflect the percentage of renewable energy penetration in the State.

This bill provides a simple, yet necessary correction to how the RPS is calculated by changing reference to energy “sales” to energy “generation”, helping to correct the overestimation of renewable energy produced in the state, and also accounting for energy losses that occur from energy transmission. It is important that this calculation is corrected to ensure that the intended outcome is achieved.

But while it is very important to correct this calculation, it is also important to ensure our targets better reflect the current science. The UN IPCC report makes clear we must limit warming to 1.5 degrees Celsius, and that to do this it requires a major and immediate transformation across all sectors to achieve the needed emissions reductions. In light of this scientific information about the climate emergency, we need to accelerate our adoption of renewable energy.

But aside from the climate benefits, modeling studies have demonstrated that a fast, decisive shift to clean, renewable energy will yield significant economic benefits. Bottomline: going faster is cheaper.

That said, we respectfully recommend that the renewable energy target for 2030 be increased from the current 40% to 80% of generation. **Accelerating our pathway to transition to 100% renewable energy is not only critically necessary, but doable, and with the added benefit that it will save us money.** We urge you to consider this amendment.

Mahalo for the opportunity to testify in **support** of this very important measure.

Sherry Pollack
Co-Founder, 350Hawaii.org



Environmental Caucus of The Democratic Party of Hawai'i

Energy & Climate Action Committee

Monday, March 14, 2022, 3:00 pm

Senate Committee on Energy, Economic Development, Tourism, and Technology
HOUSE BILL 2089 – RELATING TO RENEWABLE PORTFOLIO STANDARDS

Position: Strong Support

Me ke Aloha, Chair Wakai, Vice-Chair Misalucha, and Members of the Committee on Energy, Economic Development, Tourism, and Technology:

The Energy and Climate Action Committee of the Environmental Caucus of the Democratic Party strongly supports SB3057 in the effort to more accurately reflect the percentage of renewable energy use in the State, an important State goal.

The bill redefines both the numerator and the denominator in measuring renewable energy use. As things currently stand, the numerator is the sales percentage of renewable sources, allowing a quotient of the total distributed energy to easily be well over 100%, whereas we want to track progress toward 100% renewable sources. The bill amends the definition of the numerator as percentage of energy generation, rather than sales.

In addition, we support changing the denominator of the renewable portfolio standard to include energy generated by customers on-site. Under the current RPS definition, customer-sited, grid-connected distributed energy is only included in the numerator. The current definitions overstate the electric utility's actual progress on renewable energy adoption; and the new definitions are corrective.

Mahalo for the opportunity to address this matter.

/s/ Charley Ice & Ted Bohlen, Co-Chairs, Energy and Climate Action Committee
Environmental Caucus of the Democratic Party



Email: communications@ulupono.com

SENATE COMMITTEE ON ENERGY, ECONOMIC DEVELOPMENT, & TOURISM
Monday, March 14, 2022 — 3:00 p.m.

Ulupono Initiative supports HB 2089 HD 1, Relating to Renewable Portfolio Standards.

Dear Chair Wakai and Members of the Committee:

My name is Micah Munekata, and I am the Director of Government Affairs at Ulupono Initiative. We are a Hawai'i-focused impact investment firm that strives to improve the quality of life throughout the islands by helping our communities become more resilient and self-sufficient through locally produced food; renewable energy and clean transportation; and better management of freshwater and waste.

Ulupono supports HB 2089 HD 1, which amends the definition of renewable portfolio standard (RPS) to be a percentage of electrical energy generation rather than sales, excluding customer-sited fossil fuel generation and expands the events or circumstances that are beyond an electric utility company's reasonable control to include non-renewable energy generated by electric generation facilities over or of which the electric utility does not have a Power Purchase Agreement (PPA), direct control or ownership.

Ulupono remains supportive of amending the RPS definition to more accurately reflect the percentage of renewable energy use in the State by including customer-sited generation distributed energy resources (DER) into the denominator of the RPS calculation. Under the current RPS definition, customer-sited, grid-connected DER is only included in the numerator. This overstates the electric utility's actual progress on the State's level of renewable energy adoption. Pursuant to Act 97, SLH 2015 (Act 97), for the year 2020, Hawai'i was to generate 30 percent of the state's electricity from renewable resources. According to Hawaiian Electric's 2020 RPS Status Report, under the current RPS definition, the utility reported a consolidated RPS of 34.5 percent, of which customer-sited generation accounted for 47.3 percent of the total consolidated megawatt hours (MWh) of electrical energy generated from renewable energy sources.¹ In comparison, if the corrected RPS definition was applied for 2020, Hawaiian Electric's consolidated RPS would be 25.6 percent, 8.9 percent less than the reported consolidated RPS total for 2020, and 4.4 percent less than 2020 RPS target established by Act 97.

Investing in a Sustainable Hawai'i



If passed, this measure would more accurately reflect the legislative intent of Act 97, SLH 2015, and would be appropriately aligned with the Public Utilities Commission's (PUC) recent decision in the Performance-Based Regulation docket, to provide the electric utility with financial rewards for exceeding interim year RPS targets based on the corrected RPS percentage.ⁱⁱ

As Hawai'i's energy issues become increasingly complex and challenging, we appreciate this committee's efforts to look at policies that support the continued implementation of renewable energy resources throughout the islands.

Thank you for this opportunity to testify.

Respectfully,

Micah Munekata
Director of Government Affairs

ⁱSee Hawai'i Public Utilities Commission, Docket 2007-0008, [Hawaiian Electric's 2020 Renewable Portfolio Standard Status Report](#), filed February 12, 2021.

ⁱⁱSee Hawai'i Public Utilities Commission, Docket 2018-0088 – Instituting a Proceeding to Investigate Performance Based Regulation, Decision and Order 37507 at 116. "The structure of the [Renewable Portfolio Standard-Accelerated] PIM is as follows...the metric will be the Companies' annual compliance with the RPS (% and year-based milestone), on a consolidated basis. The PIM will utilize a "corrected" methodology, where the RPS will be calculated based on the total system renewable generation divided by total system generation of electricity, rather than division by net sales."



**Hawaiian
Electric**

**TESTIMONY BEFORE THE SENATE COMMITTEE ON
ENERGY, ECONOMIC DEVELOPMENT, AND TOURISM**

H.B. 2089 H.D.1

Relating to Renewable Portfolio Standards

Monday, March 14, 2022

3:00 pm, Agenda Item #5

State Capitol, Conference Room 224 & Videoconference

Marc Asano

Director, Integrated Grid Planning

Hawaiian Electric

Chair Wakai, Vice Chair Misalucha, and Members of the Committee:

My name is Marc Asano and I am testifying on behalf of Hawaiian Electric Company **in support of H.B. 2089 HD1**, Relating to Renewable Portfolio Standards.

H.B. 2089 HD1 amends the definition of renewable portfolio standard for electric utility companies to be a percentage of electrical energy generation, rather than sales.

Hawaiian Electric supports HD1 to change the RPS definition for an electric utility from a percentage of sales to a percentage of generation, excluding customer-sited fossil fuel generation. In 2021, Hawaiian Electric achieved an RPS of 38 percent as a percentage of sales, which translated to roughly 31.5 percent of renewable electrical energy generation. Hawaiian Electric expects to continue to make significant progress on the RPS over the next few years. This includes executing on our ambitious Climate Change Action Plan to reduce carbon emissions in 2030 by as much as 70 percent below 2005 levels. Over the next eight years we anticipate a steady pace of cost-effective renewable energy resources coming online to reduce the use of fossil fuels to generate electricity. Key elements of Hawaiian Electric's 2030 plan include:

- Shutting down the state's last coal plant in 2022;

- Adding nearly 50,000 rooftop solar systems to the 90,000 now online;
- Retiring at least 6 fossil-fueled generating units and significantly reducing the use of others as new renewable resources come online;
- Adding renewable energy projects capable of generating a total of at least 1 gigawatt, including shared solar (community-based renewable energy);
- Using more grid-scale and customer-owned energy storage;
- Expanding geothermal resources; and
- Creating innovative programs that provide customers incentives for using clean, lower-cost energy at certain times of the day and using less fossil-fueled energy at night.

Hawaiian Electric notes a couple of policy implications of this bill. First, calculating RPS as a percentage of generation versus sales, will require more renewable generation to achieve the same percentage. Therefore, additional land may be required to site renewable energy projects. As indicated above, in 2021 there was about a 6.5 percent difference in RPS between the current RPS calculation and the proposed calculation under this bill.

Second, to truly achieve the state's net negative decarbonization goal pursuant to H.R.S. §225P-5, the availability of fossil fuels for use in the State should be addressed at a broader policy level to ensure that transportation, industry, electricity, and other sectors, are mandated to comply with State energy policy. For example, customers choosing to generate their own electricity using fossil fuels, would be counterproductive to achieving the State's decarbonization goals. Today, there are large customers who have on-site generation that use fossil fuels. In the future, this could increase if, for example, renewable energy is more expensive than fossil fuels,

and makes economic sense for large (or residential) customers to therefore supply their own load with fossil fueled generation.

Accordingly, Hawaiian Electric supports H.B. 2089 HD1 while offering other comments for your consideration. Thank you for this opportunity to testify.



SENATE COMMITTEE ON ENERGY, ECONOMIC DEVELOPMENT, AND TOURISM

March 14, 2022, 3:00 P.M.

Conference Room 224 & Video Conference

TESTIMONY IN SUPPORT OF HB 2089 HD1

Aloha Chair Wakai, Vice Chair Misalucha, and members of the Committee:

Blue Planet Foundation **supports HB 2089, which would implement an accounting correction for the state’s renewable portfolio standard (RPS) calculation.** Currently, the state’s RPS calculation can provide utilities with “double credit” for some distributed energy sources, such as rooftop solar. This leads to the outcome that the calculated RPS can be greater than the actual percentage of renewable energy on Hawaii’s electric grids. House Bill 2089 would revise the RPS accounting calculation to address this outcome.

While power supply planning to date has not been hampered by this faulty calculation, it nonetheless creates uncertainty and lack of clarity for consumers. This is a long-standing problematic feature of Hawaii’s energy targets. As an example, the circa-2008 clean energy initiative goal of 70% renewable energy was actually a 40% renewable energy goal, with a supporting energy efficiency goal of 30%. Consumers were endlessly confused by the reference to “70%.”

Fixing the RPS calculation is intended to avoid repeating that mistake. **100% renewable energy should mean 100% renewable energy.**

Thank you for the opportunity to provide testimony.

HB-2089-HD-1

Submitted on: 3/13/2022 2:57:21 PM

Testimony for EET on 3/14/2022 3:00:00 PM

| Submitted By | Organization | Testifier Position | Testify |
|--------------|---|--------------------|-------------------|
| Ted Bohlen | Testifying for Climate Protectors Hawai'i | Support | Remotely Via Zoom |

Comments:

To: The Honorable Senators Glenn Wakai, Chair, Bennette Misalucha, Vice Chair, and Energy, Economic Development and Tourism Committee members

From: Climate Protectors Hawai'i (by Ted Bohlen)

RE: Hearing HB2089 HD1 RELATING TO RENEWABLE PORTFOLIO STANDARDS, Monday, March 14, 2022, 3:00 pm

Aloha Chairs Wakai and Moriwaki, Vice Chairs Misalucha and Dela Cruz, and members of the Committees:

Position: **Climate Protectors Hawai'i strongly support HB2089 HD1**

This bill would amend the renewable portfolio standard (RPS) definition to more accurately reflect the percentage of renewable energy use in the State, by basing it on generation rather than sales. It would add customer-sited generation distributed energy resources (DER) into the denominator of the RPS calculation. Under the current RPS definition, customer-sited, grid-connected DER is only included in the numerator. This overstates the electric utility's actual progress on renewable energy adoption.

This change is needed to accurately track utilities' renewable energy percentages.

Please pass this bill! Mahalo!

Climate Protectors Hawai'i (by Ted Bohlen)

LATE



Environmental Caucus of The Democratic Party of Hawai'i

To: The Honorable Glenn Wakai, Chair
The Honorable Bennette E. Misalucha, Vice Chair
Committee on Energy, Economic Development

Re: **HB 2089 HD 1 – RELATING TO RENEWABLE PORTFOLIO STANDARDS.**
Hearing: Monday, March 14, 2022, 3:00 p.m., Conference Room 224 & Videoconference
Position: **Strong support**

Aloha, Chair Wakai, Vice Chair Misalucha and Members of the Committee on Energy, Economic Development, and Tourism:

The Environmental Caucus of the Democratic Party of Hawai'i stands in strong support of HB 2089 HD 1. This measure would amend the definition of “renewable portfolio standard” to be a percentage of electrical energy generation, rather than sales, excluding customer-sited fossil fuels generation. This bill would also expand the events or circumstances that are beyond an electric utility company’s reasonable control to include non-renewable energy generated by electric generation facilities over or of which the electric utility does not have direct control or ownership.

The Environmental Caucus supports this bill as the current calculation, based on electrical energy sales rather than on electrical energy generation, overestimates the amount of renewable energy serving Hawaii’s electric utility customers and does not accurately reflect Hawaii’s progress towards its stated energy and climate goals of 100% renewable energy by 2045.

Further, in 2016, according to the Power Supply Improvement Plan by HECO, the 100% renewable portfolio standard level (with the current definition based on sales) could theoretically be reached with only 79% of the electricity being renewable and the other 21% still being fossil fuel. Changing the renewable portfolio standard to be based on generation, rather than sales, would ensure that the intended outcome is achieved and not misconstrued.

Given that the current measurement based on sales is skewed and not a true reflection of how the renewable portfolio standard should be calculated, amending the narrative to reflect a percentage of electrical energy generation rather than a percentage based on sales, appears to be reasonable, justifiable, and long overdue.

Please support and pass this bill.

Melodie Adyja

Alan Burdick Co-Chairs, Environmental Caucus of the Democratic Party of Hawai'i

HB 2089 HD 1 TESTIMONY

To: Senate Committee on Energy, Economic Development, and Tourism
Hearing on March 14, 2022 at 3:00 p.m.

From: John Kawamoto

Position: Support

The Hawaii Legislature passed the renewable portfolio standard law more than 20 years ago to ensure that the generation of electrical energy transitions from fossil fuels to renewable energy.

The current standard based on sales is misleading because it can overestimate the proportion of electricity generated by renewables. A 100% renewable portfolio standard level can be attained when actually only 79% of the electricity is renewable and 21% still fossil fuel. Changing the renewable portfolio standard so that it is based on generation, rather than sales, would ensure that the intended outcome is achieved.

For the foregoing reasons I support the bill.