



Adrian Bankhead &lt;abankhead@avaenergy.org&gt;

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## Bright Choice Carbon Emissions (2022)

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Tom Kelly <tkelly@kyotousa.org>  
To: Adrian Bankhead <abankhead@ebce.org>  
Cc: Anne Olivia Eldred <anneolivia.eldred@gmail.com>

Mon, Dec 18, 2023 at 3:11 PM

Dear Adrian,

Please provide copies of this message to members of the CAC. Thank you.

Below and attached is a summary of the data from Ava's 2022 Power Source Disclosure (PSD) report for Bright Choice. The data was compiled by the CEC based on information provided to it by Ava. Here's what the data tells us:

1. EBCE purchased 5,076,143 MWh of electricity for retail sales to EBCE's Bright Choice customers in 2022.
2. Approximately 25% of that total come from PCC-2 (or Bucket 2) renewables located in British Columbia, Oregon, Idaho, Wyoming, Washington, Colorado. The CA Energy Commission gives EBCE Renewable Portfolio Standard credit for that renewable power, however, since none of that electricity was delivered to, or consumed by, customers in California, EBCE had to procure a similar amount of "system power" for its customers. System power is primarily natural gas and comes with a significant emissions factor.
3. The CEC calculates that, based on EBCE's purchases in 2022, Bright Choice was responsible for an astounding 1,141,956 metric tons of CO<sub>2</sub>e.
4. The US EPA has pegged the "social cost of carbon" at \$190/ton. If Ava was responsible for paying that for the carbon emissions for which it is responsible, it would cost the agency (via its customers) \$217,000,000. See, [https://www.nytimes.com/2023/12/02/climate/biden-social-cost-carbon-climate-change.html?unlocked\\_article\\_code=1.G00.-wNC.563xkzUimtW1&smid=url-share](https://www.nytimes.com/2023/12/02/climate/biden-social-cost-carbon-climate-change.html?unlocked_article_code=1.G00.-wNC.563xkzUimtW1&smid=url-share)


If you find this unacceptable, then I urge you to step up and speak out. Ava's reserves are healthy enough to easily eliminate all carbon emissions associated with Bright Choice in 2024.

Tom Kelly  
Berkeley

2022 Bright Choice Data  
Retail Sales (MWh)  
5,076,143  
Net Specified Procurement (MWh)  
3,640,534  
Unspecified Power (MWh)  
1,435,609  
Procurement to be adjusted

-  
Net Specified Natural Gas  
-  
Net Specified Coal & Other Fossil Fuels  
-  
Net Specified Nuclear, Large Hydro, Renewables, and ACS Power  
3,640,534  
GHG Emissions (excludes grandfathered emissions)  
1,141,956  
GHG Emissions Intensity (in MT CO<sub>2</sub>e/MWh)  
0.2250

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 **2022 Bright Choice data (CEC).pdf**  
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2022 Bright Choice Data

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Unspecified Power (MWh)	1,435,609
Procurement to be adjusted	-
Net Specified Natural Gas	-
Net Specified Coal & Other Fossil Fuels	-
Net Specified Nuclear, Large Hydro, Renewables, and ACS Power	3,640,534
GHG Emissions (excludes grandfathered emissions)	1,141,956
GHG Emissions Intensity (in MT CO <sub>2</sub> e/MWh)	0.2250