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CalWEA Comments on RPS Eligibility Guidebook Workshop

Additional submitted attachment is included below.

California Wind Energy Association

June 5, 2025

California Energy Commission
Docket Office
Docket No. 21-RPS-02
715 P Street
Sacramento CA 95814

Submitted Electronically via CEC website to Docket 21-RPS-02

Re: Scoping Meeting on Proposed Updates for the Renewables Portfolio Standard Eligibility Guidebook, Tenth Edition

The California Wind Energy Association (CalWEA) appreciates this opportunity to comment on California Energy Commission's (CEC) May 21, 2025, Workshop on the Renewables Portfolio Standard (RPS) Eligibility Guidebook, Tenth Edition.

CalWEA's comments focus on Staff's proposed changes to "modernize" the guidebook terminology and application processes for distributed generation groups. Staff suggested in the workshop that these changes could enable much of the existing 10 gigawatts (GW) of rooftop solar and other distributed generation to become eligible to participate in the RPS program, which would grow over time.

The staff's proposed changes are not merely technical. They have important policy implications that require a broader policy discussion that should also be held in the CPUC's Integrated Resources Planning (IRP) process, and possibly its Net Energy Metering (NEM) docket addressing consumer protection. This is necessary because distributed generation (DG) is already accounted for in the load forecast prepared by the CEC for use in the CPUC's IRP process. Thus, DG is not "severely underrepresented in the RPS" as stated by staff in the workshop.

The CPUC uses this load forecast in planning the resources necessary to achieve California's greenhouse gas (GHG) goals. Accounting for DG in the load forecast reduces the load against which RPS percentage requirements apply. The staff proposal would therefore result in double-counting a portion (e.g., the 60% RPS percentage requirement in 2030) of those DG resources. Allowing the RECs associated with the DG systems to be sold into the

RPS market would effectively reduce the renewable energy that would otherwise be built and undermine achievement of the CPUC's (and potentially municipal utilities') RPS and GHG goals. Many, if not most, customers who install solar systems do so in part because they believe they are advancing, not undercutting, California's GHG goals. This is true regardless of the fine print that may be included in contracts that allocate RECs to the solar installation company. Moreover, these systems have already been installed; enabling the solar company owners of the RECs to sell those RECs will have no bearing on the future generation from these systems.

Further, the NEM tariff that has supported most of the 10 GW already online has been very lucrative for rooftop solar companies, and the associated costs have dramatically increased ratepayer bills.[1] Allowing those companies to profit further from what all ratepayers have already massively subsidized, and enabling GHG emissions to increase as a result, would be unjust and unfair.

For these reasons, the staff should shelve its proposal on this topic and encourage this Commission to work with the CPUC to address this issue holistically.

Sincerely,

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[1] See, e.g., CPUC Public Advocates Office, "Rooftop solar incentive to cost customers without solar an estimated $8.5 billion by the end of 2024" (August 2024). Available at: https://www.publicadvocates.cpuc.ca.gov/-/media/cal-advocates-website/files/press-room/reports-and-analyses/240822-public-advocates-office-2024-nem-cost-shift-fact-sheet.pdf