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Large-scale Solar Association Comments on draft RPS Guidebook 10th Edition

Additional submitted attachment is included below.

LARGE-SCALE SOLAR ASSOCIATION (LSA) COMMENTS ON DRAFT RENEWABLES PORTFOLIO STANDARD ELIGIBILITY GUIDEBOOK, TENTH EDITION

October 20th, 2025

The Large-scale Solar Association (LSA) appreciates this opportunity to comment on the draft California Energy Commission (CEC or Commission) Renewables Portfolio Standard Eligibility Guidebook (Tenth Edition).

LSA strongly supports the CEC's efforts to update the current Guidebook (9th Edition). As the CEC Staff has recognized, much has changed in the energy markets since 9th Edition was issued in 2017, and this update will greatly increase the clarity and usefulness of the Guidebook.

LSA's comments here focus on the treatment of Mixed-Fuel Resources (MFRs) – in particular, storage and RPS resource combinations under Section 3.6.1 - Paired Energy Storage.

LSA is encouraged that the revisions seem more relevant to the types of MFR configurations more in use today. LSA strongly supports the Guidebook clarification that, in projects with separately metered storage and RPS Resources (including the "Co-located Resource" (CLR) configuration (separate Resource IDs) under the CAISO tariff, though the language does not reference CAISO definitions or configurations), the storage facility would not be considered an "addition or enhancement" warranting subtraction of round-trip losses (RTLs) from the RPS resource output measurements for WREGIS and RPS reporting purposes.

However, LSA is still concerned about the treatment of MFRs under a "Hybrid Resource" (HR - single Resource ID) configuration, as described further below. We are also concerned about the complete removal of any project diagrams from the text, though this might be workable with a timely release of the proposed separate documentation discussed at the recent workshop.

Treatment of Hybrid Resources

Section 3.6.1 states that storage paired with an eligible RPS resource behind a single point of interconnection can either be:

- **Stand-alone** (separately metered from the RPS resource for WREGIS and RPS reporting), in which case RTLs need not be subtracted from the metered RPS energy for REC-issuance purposes, even though physically some of the RPS energy could flow into the storage before reaching the electrical grid. As noted above, this category clearly seems to include the CLR configuration under the CAISO tariff, where the storage and RPS resource have separate Resource IDs and CAISO meters used for settlement.

- **An "addition or enhancement"**, where the storage is "located behind the meter used to report generation to both WREGIS and the Energy Commission." In this configuration, RTLs for the RPS energy must be subtracted for REC-issuance purposes. Depending on interpretation of this definition, this category may include the HR configuration under the CAISO tariff, where the storage and RPS resource have a single Resource ID and CAISO meter used for settlement, even in situations where the RPS resource has an additional separate meter.

LSA believes that the definition of an "addition or enhancement" should not be based on the location of the meter used for settlement but instead should consider the functionality of the separate portions of the project.
In particular, the definition of an "addition of enhancement" should be clarified to exclude HR projects that have a separate meter for the RPS resource, even if such meter is not used for CAISO settlement, to better reflect the design and use of the two portions of an HR configuration project.

While we appreciate the need for a separate meter for the RPS resource to facilitate REC issuance without subtraction of RTLs, such meter should not have to be the meter used for CAISO settlement, and the location of the meters does not change the fundamental design or operation of an HR project as an RPS resource paired with storage, which is very similar to both: (1) CLR-configured projects; and (2) stand-alone storage and RPS resources connected to the same point of interconnection (e.g., a substation).

In actual operation, CLRs and HRs can be expected to operate in roughly the same manner. When RPS generation is plentiful, projects in either configuration would likely generate as much RPS energy as possible, and much of that generation could charge the associated storage facilities, as energy prices would likely be low. When RPS generation is low and energy prices are high, the storage facilities would likely be discharging that energy into the electrical grid.

In other words, the location and nature of the meters do not change the likelihood that some of the RPS output would go through storage before injection into the grid. As long as an HR project can provide separate meter data for the RPS resource output, there is no reason to treat it any differently than a resource in the CLR configuration with respect to RTL subtraction.

This argument is even stronger when comparing MFRs to stand-alone storage and RPS generation projects that connect to the same point of grid interconnection (e.g., substation or line), though they are completely separate projects. Much of the RPS project generation may also be used to charge the storage project generation, but there is no requirement for RTL subtraction in that situation.

In summary, LSA asks the Commission to consider clarifying the definition of an "addition or enhancement" to remove the RTL subtraction requirement for projects where the scheduling and settlement functions (e.g., with CAISO) may be combined behind a single meter but where the project provides a separate RPS metered output measurement that meets the accuracy standards for RPS reporting.

Diagrams

LSA remains concerned about the complete removal of project configuration diagrams from the Section 3.6.1. We can see the potential efficiencies of the approach suggested by Commission staff at the workshop, i.e., providing a link to a separate document that would contain different project configurations for guidance and could be updated as needed. Given the long intervals in the past between Guidebook updates, this could be a workable approach to ensuring that Commission guidance is timely and relevant.

However, the current Guidebook draft does not contain any such link. It is also not clear how often this separate document would be updated or the process for doing so (e.g., whether stakeholders could suggest inclusion of additional configuration diagrams. LSA suggests that the Commission provide this information prior to or concurrent with the publication of the final Guidebook.