

DOCKETED

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Document Title:	Peninsula Clean Energy Comments on RPS Guidebook
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California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, California 95814

Submitted Electronically

Subject: Docket No. 21-RPS-02 Peninsula Clean Energy Comments on the *Draft Renewables Portfolio Standard Eligibility Guidebook, Tenth Edition*

Dear Commissioner Gallardo, Ms. Huber, and Staff,

Peninsula Clean Energy appreciates the opportunity to comment on the Draft California Renewables Portfolio Standard Guidebook 10th Edition (“RPS Guidebook”).

Peninsula Clean Energy supports the treatment of separately metered storage as separate from renewable energy generation component of a hybrid resources. Storage in front of the meter used to report renewable energy generation to WREGIS cannot affect the renewable energy exported from the renewable generation, so it would be illogical to subtract the effects of round-trip losses. This is consistent with the treatment of other stand-alone storage, which do not subtract losses from the grid-connected generation used to charge the storage. Furthermore, penalizing renewable generation if storage is added in front of the generation meter would harm reliability by disincentivizing the addition of storage to existing renewable generation. In light of these considerations, Peninsula Clean Energy applauds the proposed clarifications on the treatment of storage in the RPS Guidebook.

Peninsula Clean Energy welcomes further conversation on RPS issues and looks forward to working collaboratively toward the continued success of the program.

Respectfully submitted,

/s/

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