

DOCKETED

Docket Number:	21-RPS-02
Project Title:	Renewables Portfolio Standard 10th Edition Guidebook Update
TN #:	266712
Document Title:	10th RPS Guidebook
Description:	N/A
Filer:	System
Organization:	American Clean Power- California
Submitter Role:	Public
Submission Date:	10/20/2025 5:26:00 PM
Docketed Date:	10/21/2025

Comment Received From: American Clean Power- California
Submitted On: 10/20/2025
Docket Number: 21-RPS-02

ACP-CA Comments on 10th RPS Guidebook

Additional submitted attachment is included below.



October 20, 2025

California Energy Commission
Docket Unit, MS-4
Docket No. 21-RPS-02
715 P Street
Sacramento, California 95814

Re: American Clean Power – California Comments on Draft RPS Guidebook, Tenth Edition
(21-RPS-02)

American Clean Power – California (“ACP-California”)¹ appreciates this opportunity to provide the following comments on the Draft Renewables Portfolio Standard Eligibility Guidebook (“RPS Guidebook”), Tenth Edition and California Energy Commission (“CEC”) staff’s October 6, 2025 workshop on the same topic. Our comments are summarized as follows:

1. ACP-California Supports the Revisions to Section 3.6 (Energy Storage).
2. ACP-California appreciates the CEC removing the requirement of preparing an e-tag matching analysis for pseudo-tied resources, consistent with CPUC verification procedures. However, we do not support the caveat on P.73 that contemplates requiring e-tag or hourly data when “additional information” may be required.

DISCUSSION

1. Energy Storage

ACP-California supports the proposed revisions to Section 3.6 of the Draft RPS Guidebook. We have long been concerned that reductions in renewable energy credit (“REC”) value due to loss accounting can create a disincentive for pairing storage with RPS resources. As noted in our June 5, 2025 comments, deducting roundtrip efficiency losses from hybrid resources can discourage the efficient use of land or increase costs due to configuring projects to avoid the

¹ The American Clean Power Association (“ACP”) is the voice of companies from across the clean power sector that are providing cost-effective solutions to the climate crisis while creating jobs, spurring massive investment in the American economy, and driving high-tech innovation across the United States. ACP’s mission is to transform the U.S. power grid to a low-cost, reliable, and renewable power system. ACP-California is a state project of ACP, representing companies who develop, own and operate utility-scale solar, storage, land-based wind, offshore wind, geothermal and transmission assets to power a clean and renewable economy for California and the West.



loss of REC value when a project would otherwise be optimized to CAISO's requirements. ACP-California appreciates that the draft revisions would streamline this process and provide greater clarity on the limited set of metering configurations that would be subject to netting of round-trip efficiency losses. We also appreciate the clarification that stand-alone energy storage devices behind the same point of interconnection but not located behind the meter used to report the generation to WREGIS would not be considered an "addition or enhancement" and thus not subject to loss accounting.

2. E-Tag Reporting and Matching

ACP-California appreciates the CEC's recognition that pseudo-tied resources should not be subject to e-tag and meter-data matching. However, the Draft Revisions to the Guidebook include a broad carve out that we are concerned will leave Load Serving Entities guessing as to whether e-tag matching will be required at some point in the future. We recommend removing the following language from the Draft Guidebook:

Where additional information is needed to verify electricity was scheduled into a CBA, including dynamic scheduling and pseudo-tie facilities, the Energy Commission may request additional reporting, such as e-Tag or hourly data for scheduling arrangements not routinely required to report this information.

The inclusion of this language sets an unfair standard that could be applied many years after RPS sales have been settled among counterparties. Moreover, if enforced, this language would amount to an illegal retroactive regulation that fails the basic due process requirements of clarity and notice of regulations. If the CEC is going to require e-tag matching it must provide forward notice so that counterparties can build these requirements into their contracts and scheduling.

CONCLUSION

ACP-California appreciates this opportunity to provide these comments on the Draft RPS Guidebook, Tenth Edition.

Sincerely,

/s/

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