



July 27, 2012

In the Matter of:

Rulemaking to Consider Modification of Regulations Establishing a Greenhouse Gases Emission Performance Standard For Baseload Generation of Local Publicly Owned Electric Utilities

Docket No. 12-OIR-1
Rulemaking Workshop

California Energy Commission

DOCKETED
12-OIR-1

TN # 66384

JUL 27 2012

Comments of the Solar Energy Industries Association

Dear Commissioner Weisenmiller,

The Solar Energy Industries Association appreciates the Commission opportunity to comment in this rulemaking. We thank you for opening this rulemaking to ensure full compliance and enforcement of California's Emissions Performance Standard (EPS). The EPS is a critical component of California's strategy to reduce global warming pollution. By ensuring no new long-term financial commitments to the dirtiest power plants, the EPS creates markets for clean energy technologies, thereby facilitating compliance with AB 32, the California Global Warming Solutions Act and the 33% Renewable Portfolio Standard (RPS).

For these reasons, we support increased transparency and reporting of POU investments and investment plans at non-compliant, dirty, power plants. We also support the Commission's tentative conclusion, in accordance with the 2007 Final Statement of Reasons, that expenditures for environmental upgrades or to meet regulatory requirements do indeed trigger the EPS. (CEC Tentative Conclusions, July 9, 2012, p. 5). If California Utilities are to reduce their greenhouse gas requirements, they must no longer invest in power plants that can't meet the EPS. The best way to reduce pollution from dirty coal plants is to invest instead in zero-emissions, renewable power.

Again, we appreciate the opportunity to comment in this important matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sara Birmingham", written in dark ink.

Sara Birmingham
Director of Western States, SEIA