

From: Zocchetti, Kate@Energy
To: Gould, Angela@Energy; Gonzalez, Lorraine@Energy;
Chisholm, Emily@Energy;
Subject: FW: POU RPS Rules on Banking Short-Term Contracts
Date: Monday, April 29, 2013 2:24:13 PM

fyi

From: Nancy Rader [mailto:nrader@calwea.org]
Sent: Monday, April 29, 2013 1:50 PM
To: Douglas, Karen@Energy; Weisenmiller, Robert@Energy; McAllister, Andrew@Energy; McDonnell, Kathleen@Energy; Parrow, Donna@Energy
Cc: Cross, Catherine@Energy; Awolowo, Ollie@Energy; Lorton, Michele@Energy; Zocchetti, Kate@Energy
Subject: POU RPS Rules on Banking Short-Term Contracts

Dear Commissioners,

I wanted to express CalWEA's serious concern regarding the removal of the prohibition on the banking of short-term RPS contracts by publicly owned utilities (POUs) from the latest staff draft of the Commission's [Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities](#).

The wind industry has made, and continues to make, very substantial investments towards achievement of California's clean-energy goals, including multi-year, site-specific environmental and grid-interconnection studies, and participation in important study and planning efforts that will lay the foundation for moving beyond 33% renewables. We have already witnessed a significant "chipping away" at the RPS through biomethane contracts that make no contribution to California's infrastructure or energy mix. Further erosion of RPS market opportunities by enabling the banking of short-term contracts will further undermine developers' confidence that California is committed to meaningfully achieving its RPS goals, such that continued investment in new projects can be justified.

The prohibition on banking short-term contracts not only would bring regulation of POU compliance into alignment with that of investor-owned utilities, it is required under the RPS statute [see PU Code §399.13(a)(4)(B) and §399.30(d)(1)].

I urge you to ensure that this egregious error in the latest draft is corrected.

Sincerely,

Nancy

Nancy Rader

Executive Director

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