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Docket Number:	16-OIR-01
Project Title:	General Rulemaking Proceeding for Developing Regulations, Guidelines and Policies for Implementing SB 350 and AB 802
TN #:	214731
Document Title:	Independent Energy Producers Association Comments on Proposed Title 20 Data Collection Regulatory Changes
Description:	N/A
Filer:	System
Organization:	Independent Energy Producers Association
Submitter Role:	Public
Submission Date:	12/9/2016 3:51:48 PM
Docketed Date:	12/9/2016

Comment Received From: Amber Blixt

Submitted On: 12/9/2016

Docket Number: 16-OIR-01

IEP Comments on CEC Title 20 Data Collection Regulatory Changes

Additional submitted attachment is included below.

December 9, 2016

**Comments of the Independent Energy Producers Association
On the California Energy Commission's
Proposed Title 20 Data Collection Regulatory Changes**

The Independent Energy Producers Association (IEP) appreciates the opportunity to comment on the California Energy Commission's (CEC) Energy Data Collection workshop convened on November 16, 2016 and on the Proposed Language for Discussion regarding the Title 20 Data Collection Regulations. IEP plans to participate in this rulemaking as the CEC develops these regulations in 2017. In general IEP supports regulations that streamline reporting requirements across agencies, avoid redundant reporting requirements where possible, and reduce the administrative burden on reporting entities.

With these principles in mind, IEP recommends that the CEC, when collecting information from power plants as part of these Title 20 Data Collection Regulations, gather information in the same format and utilize information already submitted to other agencies to the maximum extent possible. For example, under Section 1304(a)(3)(A)(1) of the Proposed Language for Discussion, the Energy Commission is requesting new and additional information related to water supplies used by power plants. Much of this information may already be requested from power plants by the State Water Resources Control Board as part of their reporting processes. To the extent that this information is already reported to the water resource agencies, IEP recommends that the CEC accept the same information, in the same format to avoid duplicative reporting requirements on electric generators. This will reduce the

administrative burden on reporting entities and streamline the reporting process across multiple agencies.

IEP looks forward to participating in this rulemaking process during 2017 and providing more input on the Proposed Title 20 Data Collection Regulatory Changes.

Respectfully Submitted,



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