

## DOCKETED

<b>Docket Number:</b>	16-RPS-01
<b>Project Title:</b>	Developing Guidelines for the 50 Percent Renewables Portfolio Standard
<b>TN #:</b>	212461
<b>Document Title:</b>	SDG&E Comments: On RPS Eligibility Guidebook, Ninth Edition
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	SDG&E
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	7/25/2016 4:00:36 PM
<b>Docketed Date:</b>	7/25/2016

*Comment Received From: Debran Jones Reed*

*Submitted On: 7/25/2016*

*Docket Number: 16-RPS-01*

**RPS Eligibility Guidebook, Ninth Edition**

*Additional submitted attachment is included below.*



Heidi Barsuglia  
Director  
State Governmental Affairs

925 L Street, Suite 650  
Sacramento, CA 95814  
(916) 492-4244  
hbarsuglia@semprautilities.com

July 25, 2016

California Energy Commission  
Dockets Office, MS-4  
RE: Docket No. 16-RPS-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

**RE: SDG&E Comments on Draft Renewables Portfolio Standard Eligibility Guidebook,  
Ninth Edition**

Dear Commissioners:

SDG&E respectfully submits the comments on the Draft to the RPS Eligibility Guidebook, Ninth Edition:

RPS Online System

SDG&E reserves comments until it observes and has experience with the new system once it is available.

2. WREGIS Adjustments a. Prior Period Adjustments states LSEs should claim procurement to reflect the actual generation amounts of the facility, regardless of the vintage dates(s) on the WREGIS Certificates.

Providing examples in the revised manual of an overproduction and underproduction would be helpful to ensure accurate reporting of prior period adjustments.

Chapter 7. D. allows POUs to withdraw RECs from a specified compliance period to be used for the following compliance period –

SDG&E notes that this clause as written provides an unfair competitive advantage for POUs over IOUs. Recognizing jurisdictional limitations of the CEC SDG&E believes that the CEC and CPUC must address and amended this clause so IOUs are afforded the same right.

Thank you for considering SDG&E's comments.

A handwritten signature in black ink that reads "Heidi Barsuglia". The signature is written in a cursive, flowing style.

c: Ms. Lynette Green