

## DOCKETED

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<b>Project Title:</b>	Developing Guidelines for the 50 Percent Renewables Portfolio Standard
<b>TN #:</b>	214962
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*Comment Received From: California Municipal Utilities Association*

*Submitted On: 12/20/2016*

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**on Draft Final Renewables Portfolio Standard Eligibility Guidebook, Ninth Edition**

*Additional submitted attachment is included below.*

STATE OF CALIFORNIA ENERGY RESOURCES CONSERVATION  
AND DEVELOPMENT COMMISSION

In the Matter of:

Developing Guidelines for the 50 Percent  
Renewables Portfolio Standard

Docket No. 16-RPS-01

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**COMMENTS OF THE  
CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION  
ON DRAFT FINAL RENEWABLES PORTFOLIO STANDARD  
ELIGIBILITY GUIDEBOOK, NINTH EDITION**

The California Municipal Utilities Association (“CMUA”) appreciates the opportunity to provide comments to the California Energy Commission (“Commission”) on the Draft Final *Renewables Portfolio Standard Eligibility Guidebook, Ninth Edition*, (“Draft Final Guidebook”) issued on December 7, 2016. CMUA commends staff for their hard work in preparing this new edition of the guidebook.

While CMUA may provide further oral comments at the January 25, 2017 Business Meeting, CMUA wishes to identify one concern in these written comments. On page 41 of the Draft Final Guidebook, the following language was added:

Energy storage technologies using pumped storage hydroelectric may qualify for RPS if 1) the facility meets the eligibility requirements for conduit hydroelectric, small hydroelectric, or incremental hydroelectric facilities, and 2) the electricity used to pump the water into the storage reservoir qualifies as RPS-eligible. The amount of energy that may qualify for the RPS is the amount of electricity dispatched from the pumped storage facility.

This issue was discussed and commented on as part of the development process for the Seventh Edition of the Eligibility Guidebook.<sup>1</sup> However, it is CMUA's understanding that the currently effective Eighth Edition of the Eligibility Guidebook does not expressly address any specific requirements for pumped hydroelectric facilities in the context of energy storage. It is also CMUA's understanding that no parties provided comments on this issue in the current proceeding. In light of the fact that several years have passed since there was any substantive debate on this issue, CMUA recommends that the Commission delay including the language identified above until the next edition of the guidebook. This will allow parties sufficient time to fully consider and comment on this proposal.

CMUA appreciates the opportunity to provide comments on the Final Draft Guidebook.

Dated: December 20, 2016

Respectfully submitted,



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<sup>1</sup> See e.g., CMUA Comments on the Proposed Revisions to the Renewables Portfolio Standard Eligibility Guidebook at 5, March 25, 2013 (available at: <http://doCKETpublic.energy.ca.gov/PublicDocuments/Migration-12-22-2015/Non-Regulatory/2000-2011%20Proceedings/11-RPS-01/2013/TN%2070069%2003-25-13%20CMUA%20Comments%20on%20CEC's%207th%20Edition%20RPS%20Eligibility%20Guidebook.pdf>).