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11-RPS-01

DOCKET

02-REN-1038

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November 2, 2011

California Energy Commission
Dockets Office, MS-4
RPS Proceeding
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 11-RPS-01 and Docket No. 02-REN-1038

To the California Energy Commission:

Thank you for the opportunity to provide comments on the proposed changes to the California Energy Commission's RPS Eligibility Guidebook.

We appreciate the effort the CEC is going through to make changes to further promote the development of California's RPS requirements. Our comments are focused on the application requirements for aggregated, distributed generation solar facilities.

As it currently stands, WREGIS only allows aggregations to be in sizes of 360kW or less. It would be advisable to reevaluate this restriction to allow for aggregations to have no maximum capacity, but be open-ended in how much capacity can be added to the aggregation. An example of this is found in the way the Massachusetts Department of Energy Resources has structured its solar aggregation requirements. Aggregators submit an initial application to be approved as an aggregator by the state. The aggregator will then submit applications on behalf of applicants to be included in the aggregator's facility group.

Additionally, we suggest that the eligibility of an individual facility not affect the RPS eligibility of an entire aggregation, and be handled on a facility-by-facility basis. Thus, if a single new system was to not meet specific RPS criteria or require additional clarification, the aggregated group would not suddenly become ineligible during the period in which the necessary amended materials for the individual ineligible facility are submitted. A similar structure has been set up in Massachusetts to handle the addition of new facilities to an aggregated group.

Lastly, please consider the expected volume of distributed generation systems to request CA RPS eligibility. Through our experience, it is most beneficial to have application procedures take place electronically and limit the amount of physical paperwork to be signed and mailed. We believe this will help limit the amount of resources required by the CEC to manage the program.

Thank you for your consideration and please do not hesitate to contact us for further clarification on these matters.

Best,

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