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Via Email:

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March 25, 2013

California Energy Commission
Dockets Office, MS-4

Re: Docket Nos. 11-RPS-01; 02-REN-1038

RPS Proceeding

1516 Ninth Street

Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

02-REN-1038

TN # 70078

MAR 25 2013

RE: Proposed Changes to the Renewable Portfolio Standard (RPS) Eligibility Guidebook

To Whom It May Concern:

The California Biomass Energy Alliance ("CBEA") appreciates the opportunity to comment on the Proposed Revisions to the Renewable Portfolio Standard Eligibility Guidebook (Seventh Edition, Staff Draft Guidebook). As you know CBEA is the trade association of the State's 33 solid fuel biomass power producers which generate roughly 600 MWs of reliable, baseload power. The Alliance is comprised of facilities with a variety of types of contracts including legacy Qualifying Facility SO4s and contracts as a result of bilateral agreements and utility RPS solicitations.

CBEA's comments at this time are limited to two issues: RPS tracking, reporting and verification (and certification); and, the definition of Station Service. CBEA would like to be on record supporting the comments and positions on these two issues made by the Independent Energy Producers Association ("IEP") in their testimony at the March 14th workshop and official comments docketed today. Specifically, on these two issues:

- CBEA supports clarifying that electric generators operating under contracts, if not conveying environmental attributes, yet whose generation is being counted for purposes of meeting a retail seller's RPS obligation, are excluded from the reporting obligations detailed in Section III (and elsewhere as appropriate). As is current practice, the reporting requirements for these facilities should be handled by the retail seller with the compliance, reporting, and verification obligations.
- CBEA supports applying the FERC definition for Station Service. We believe this will enhance regulatory stability, particularly in terms of supporting the crucial state and federal nexus; support rather than hinder the commercial transactions that underlie the development of RPS eligible renewable facilities (in California and within the WECC);

and, significantly enhance business and developer certainty. The need for consistency in the treatment of station power between the states and federal agencies should be a paramount goal. Accordingly, CBEA supports IEP recommendation that the CEC adopt the FERC definition for Station Service, and then work to ensure that WREGIS does the same to the extent they are not.

Thank you for giving CBEA the opportunity to comment on this draft document. We know merging two Guidebooks and recent statutory changes is complex venture so we remain available if you have any further questions or issues.

Sincerely,

A handwritten signature in black ink, reading "Julee Malinowski Ball". The signature is fluid and cursive, with the first name "Julee" being the most prominent.

Julee Malinowski Ball, Executive Director
California Biomass Energy Alliance

JMB/kmg