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

California Energy Commission

DOCKETED
11-RPS-01

TN # 70452
APR. 25 2013

RE: Docket Number 11-RPS-01 & Docket Number 02-REN-1038, Developing Regulations and Guidelines for the 33 percent Renewables Portfolio Standard

Greetings:

Global Geothermal Ltd and its subsidiary Recurrent Engineering LLC are technology suppliers to the geothermal power industry. Accordingly, we are following the events and discussion associated with "station service" with great interest and concern.

We strongly recommend that the CEC adopt the Federal Energy Regulatory Commission's definition for "station service." This fair and well established definition importantly provides clear and consistent guidelines to the industry, regardless of project location. We simply cannot imagine what benefit a change from the existing national standard would provide.

Thanks for the opportunity to present our opinion. Please feel free to contact me for further discussion.

Sincerely,
GLOBAL GEOTHERMAL & RECURRENT ENGINEERING

A handwritten signature in black ink, appearing to read "Bruce Levy". The signature is written in a cursive, flowing style.

Bruce Levy
Chief Executive