



November 5, 2014

Governor Jerry Brown
State of California
State Capitol, Suite 1173
Sacramento, CA

California Energy Commission

DOCKETED

11-RPS-01

TN 73969

NOV 6 2014

Dear Governor Brown,

We write in support of a statewide policy that would recognize and appropriately count distributed solar generation systems in California as renewable resources. Doing so would complement your Administration's efforts to advance localized renewable resources – which avoid impacts associated with new transmission lines – to support the growing demand by utility customers, and would support California's Renewables Portfolio Standard (RPS).

More should be done to incentivize the installation of locally-sited distributed generation in California. Unfortunately, current state regulatory policy discourages utilities from facilitating development of “behind the meter” distributed renewable generation resources located at customers' facilities. Indeed, some public power utilities may be faced with *rejecting* such “behind the meter” renewable distributed generation projects because, under current RPS accounting policies, generation from such resources does not count toward RPS compliance. This is wrong. The State should amend applicable regulations to encourage utilities to work with customers to increase development of local distributed generation systems at the customer site. Distributed solar generation is amongst the State's most valuable renewable resources and should be accounted for accordingly.

As California begins to work towards meeting the federal government's proposed rules to further reduce carbon emissions from the power sector, now is the ideal time to revisit existing rules to remove road blocks that would hinder the achievement of those targets as efficiently and effectively as possible. The utility sector will play a critical role in this process. We urge your leadership to further enhance the outreach and collaboration between the State's utilities and customers by ensuring that distributed generation is appropriately counted to reflect California's true progress towards meeting the RPS. Failure to do so would result in *undercounting* California's *progress* towards achieving its RPS and greenhouse gas reduction goals.

Thank you for your time and consideration.

Sincerely,



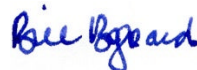
Chuck Reed
Mayor, San Jose



Eric Garcetti
Mayor, Los Angeles



Ed Lee
Mayor, San Francisco



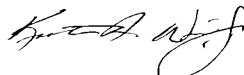
Bill Bogaard
Mayor, Pasadena



Miguel Pulido
Mayor, Santa Ana



Tom Tait
Mayor, Anaheim



Ken Weir
Vice Mayor, Bakersfield



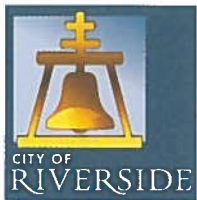
Robert Garcia
Mayor, Long Beach



Kevin Johnson
Mayor, Sacramento

/S/ Deborah Franklin

Deborah Franklin
Mayor, Banning



Office of the Mayor
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October 24, 2014

Governor Jerry Brown
State of California
State Capitol, Suite 1173
Sacramento, CA

Dear Governor Brown,

We write in support of a statewide policy that would recognize and appropriately count distributed solar generation systems in California as renewable resources. Doing so would complement your Administration's efforts to advance localized renewable resources – which avoid impacts associated with new transmission lines – to support the growing demand by utility customers, and would support California's Renewables Portfolio Standard (RPS).

More should be done to incentivize the installation of locally-sited distributed generation in California. Unfortunately, current state regulatory policy discourages utilities from facilitating development of "behind the meter" distributed renewable generation resources located at customers' facilities. Indeed, some public power utilities may be faced with rejecting such "behind the meter" renewable distributed generation projects because, under current RPS accounting policies, generation from such resources does not count toward RPS compliance. This is wrong. The State should amend applicable regulations to encourage utilities to work with customers to increase development of local distributed generation systems at the customer site. Distributed solar generation can contribute toward California's RPS goal and should be accounted for accordingly.

As California begins to work towards meeting the federal government's proposed rules to further reduce carbon emissions from the power sector, now is the ideal time to revisit existing rules to remove road blocks that would hinder the achievement of those targets as efficiently and effectively as possible. The utility sector will play a critical role in this process. We urge your leadership to further enhance the outreach and collaboration between the State's utilities and customers by ensuring that distributed generation is appropriately counted to reflect California's true progress towards meeting the RPS. Failure to do so would result in undercounting California's progress towards achieving its RPS and greenhouse gas reduction goals.

Thank you for your time and consideration.

Sincerely,

Mayor Rusty Bailey



October 27, 2014

MAYOR

Sarah S. Zamora

COUNCIL MEMBERS

David J. Toro
District 1

Frank A. Gonzales
District 2

Frank J. Navarro
District 3

Susan M. Oliva
District 4

Deirdre H. Bennett
District 5

Isaac T. Suchil
District 6
Mayor Pro Tem

The Honorable Governor Jerry Brown
State of California
State Capitol Building, Room 1173
Sacramento, CA 95814

Dear Governor Brown,

The City of Colton supports a statewide policy that would recognize and appropriately count distributed solar generation systems in California as renewable resources. As such, this would complement your Administration's efforts to advance localized renewable resources—which prevent impacts associated with new transmission lines. Further supporting the growing demands by utility customers and California's Renewables Portfolio Standard (RPS).

More should be done to incentivize the installation of locally-sited distributed generation in California. Unfortunately, current state regulatory policy discourages utilities from facilitating development of "behind the meter" distributed renewable generation resources located at customers' facilities. Indeed, some public power utilities may be faced with rejecting such "behind the meter" renewable distributed generation projects because, under current RPS accounting policies, generation from such resources does not count toward RPS compliance. This is wrong.

Distributed solar generation is amongst the State's most valuable renewable resources and should be accounted for accordingly. As a result, the State should amend applicable regulations that encourage public power utilities to work with customers to increase development of local distributed generation systems at the customer site.

It is my understanding that California has begun work to fulfill the federal governments proposed rules to further reduce carbon emissions from the power sector. We must be as efficient and effective as possible. As we work to achieve targeted goals, the utility sector will inevitably play a critical role in this process. Given this, Colton believes now is the ideal time to review and amend existing rules and remove road blocks that hinder our progress.

On behalf of the Colton City Council and the constituents we all serve, I urge your leadership to further enhance the outreach and collaboration between the State's utilities and customers by ensuring that distributed generation is appropriately counted to reflect California's true progress towards meeting the RPS. Failure to do so would result in undercounting California's progress towards achieving its RPS and greenhouse gas reduction goals.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Sarah S. Zamora".
Mayor Sarah S. Zamora

cc: Members of the Colton City Council
Colton Acting City Manager Amer Jakher
Colton Public Utilities Director David Kolk



DAVE ROBERTS

SUPERVISOR, THIRD DISTRICT
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Tierrasanta

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October 29, 2014

Governor Jerry Brown
State of California
State Capitol, Suite 1173
Sacramento, CA

Dear Governor Brown:

I am writing in support of a statewide policy that would recognize and appropriately count distributed solar generation systems in California as renewable resources. Doing so would complement your Administration's efforts to advance localized renewable resources – which avoids impacts associated with new transmission lines – to support the growing demand by utility customers, and would support California's Renewables Portfolio Standard (RPS).

More should be done to incentivize the installation of locally-sited distributed generation in California. Unfortunately, current state regulatory policy discourages utilities from facilitating development of "behind the meter" distributed renewable generation resources located at customers' facilities. Indeed, some public power utilities may be faced with *rejecting* such "behind the meter" renewable distributed generation projects because, under current RPS accounting policies, generation from such resources does not count toward RPS compliance. This is wrong. The State should amend applicable regulations to encourage utilities to work with customers to increase development of local distributed generation systems at the customer site. Distributed solar generation is amongst the State's most valuable renewable resources and should be accounted for accordingly.

As California begins to work toward meeting the federal government's proposed rules to further reduce carbon emissions from the power sector, now is the ideal time to revisit existing rules to remove road blocks that would hinder the achievement of those targets as efficiently and effectively as possible. The utility sector will play a critical role in this process. We urge your leadership to further enhance the outreach and collaboration between the State's utilities and customers by ensuring that distributed generation is

appropriately counted to reflect California's true progress towards meeting the RPS. Failure to do so would result in *undercounting* California's *progress* towards achieving its RPS and greenhouse gas reduction goals.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink that reads "Dave Roberts". The signature is written in a cursive, flowing style.

Dave Roberts
Supervisor, Third District
San Diego County Board of Supervisors

DR/sk