

October 23, 2015

Energy Commission Executive Director
California Energy Commission
1516 9th Street, MS-39
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

11-RPS-01

TN # 762JJÁ

OCT 23 2015

Re: Lake Mendocino Hydroelectric Plant, RPS ID 62781
Application for RPS Certification

To Whom It May Concern,

The City of Ukiah Electric Utility is requesting an extension of time to submit a complete application for RPS certification for the Lake Mendocino Hydroelectric Plant, PRS ID 62781, for the first compliance period. Per email dated September 23, 2015, the highlighted text below is added for clarification. Should additional information be necessary please feel free to contact Diann Lucchetti at 707-467-5711.

1. The Lake Mendocino Hydroelectric Plant is located at 1229 Lake Mendocino Drive, Ukiah, CA 95482. It was in commercial operation first in 5/1/1987. After refurbishment in the post 2010 operating started in 6/1/2006.
2. The City of Ukiah is requesting 5 months (December 31, 2013 through May 31, 2014) of additional time to complete the RPS certification application.

3. Ukiah Electric Utility is a small Municipal utility with an administrative staff of two. The circumstances were outside the staff's control since requested documents between the City of Ukiah and the US Corps. Of Engineers were not locatable with historical records and knowledgeable personnel were long since retired.

Plant records were not available and had to be located from other organizations and/or former employees to help locate the required documents. This was a time consuming effort with a relatively new City staff. The plant was refurbished and made operational with few records retained.

4. If the extension of time is not granted, financial loss from losing the Lake Mendocino REC value would directly impact the electric rate payer in Ukiah. As with any small utility every dollar matters. The loss of these funds would impact our ratepayers on the order of \$200,000 to 300,000 for loss REC revenue which for a small utility is substantial. The Utility is currently reviewing electric rates and this amount will have a first year impact of 2.7 percent increase to the rate payer.
5. The City of Ukiah has a long history promoting and investing in renewable energy resources with a 2014 renewable content of fifty eight percent. This includes large and small Hydro, Geothermal and the 1987 Mendocino Hydroelectric facility. Considering the City's long term commitment to clean carbon free energy, availability of required documents and the economic impact to our small community, receiving full 2011 through 2014 REC credit value will make .

Granting this request will reduce future rate increase and encourage the Ukiah City Council to continue supporting carbon reduction and promoting clean energy resources.

Thank you for your consideration,

Mel Grandi, Electric Utility Director
City of Ukiah
411 W. Clay Street
Ukiah, CA 95482
(707) 463-6295

MG/dl