

<b>DOCKETED</b>	
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<b>Project Title:</b>	Renewable Energy for Agriculture Program
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<b>Document Title:</b>	Wonderful Company REAP Comments
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*Comment Received From: Melissa Frank*  
*Submitted On: 10/22/2018*  
*Docket Number: 18-MISC-03*

## **Wonderful Company REAP Comments**

On behalf of The Wonderful Company, please find our comments on the Second Staff Version of the Renewable Energy for Agriculture Program's DRAFT Guidelines attached.

*Additional submitted attachment is included below.*



October 22, 2018

VIA ELECTRONIC SUBMISSION

Geoff Dodson  
California Energy Commission  
Docket Unit, MS-4  
1516 Ninth Street  
Sacramento, CA 95814

**Re: Renewable Energy for Agriculture Program DRAFT Guidelines, Second Staff Version  
(Docket # 18-MISC-03)**

Dear Mr. Dodson,

The Wonderful Company LLC ("Wonderful") appreciates the opportunity to provide comments to the California Energy Commission ("CEC") on the Renewable Energy for Agriculture Program ("REAP") Second Staff Version of the DRAFT Guidelines.

Wonderful and its related entities farm and process almonds, pistachios, citrus, pomegranates, nursery stock, and wine grapes throughout California. Every year we grow, harvest, package and ship healthy products to our customers on a global scale. We view the REAP program as an important tool to assist California agriculture in expanding its environmental stewardship, contributing to improved air quality and reduced greenhouse gas emissions.

We generally support the current draft REAP guidelines; however, we request that additional clarity be added regarding the types of ownership structures eligible for participation. Specifically, participation of Power Purchase Agreements ("PPAs") should be allowed. As we understand, the ultimate goal of REAP is to reduce greenhouse gas emissions. As such, it is prudent that CEC include participation of all forms of ownership into the grant program to provide maximum flexibility and encourage investment in renewable energy technology. Specifically, we support CEC adding a clause to the "Eligible Projects" section of the guidelines that reads:

*"All projects are required to show a reduction in GHG emissions and install commercially available onsite renewable energy technology to serve agricultural operations. Eligible installed commercial renewable technologies can include: direct ownership, lease options, and/or power purchase agreements with third party developers."*

As currently drafted, the guidelines lack clarity regarding the types of ownership structures allowed under the Program. Therefore, we recommend providing clarification on this point to explicitly allow PPAs as an eligible project.

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In addition, we encourage the CEC to consider adding additional resources to the REAP to encourage and incentivize investment in large scale renewable energy projects at agricultural facilities.

Wonderful applauds the CEC for its attention to this important program and appreciates the opportunity to provide feedback.

We would be happy to discuss our comments at your convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Melissa Frank', with a stylized, flowing script.

Melissa Frank  
Senior Counsel/Director of Government Affairs