

DOCKETED

Docket Number:	16-RPS-03
Project Title:	Amendments to Regulations Specifying Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities
TN #:	234225
Document Title:	Roseville Electric Comments - COMMENTS OF ROSEVILLE ELECTRIC UTILITY ON 15-DAY LANGUAGE MODIFICATION OF REGULATIONS FOR RPS FOR LOCAL POUS
Description:	N/A
Filer:	System
Organization:	Roseville Electric Utility
Submitter Role:	Public Agency
Submission Date:	8/4/2020 4:57:01 PM
Docketed Date:	8/4/2020

*Comment Received From: Roseville Electric
Submitted On: 8/4/2020
Docket Number: 16-RPS-03*

**COMMENTS OF ROSEVILLE ELECTRIC UTILITY ON 15-DAY
LANGUAGE MODIFICATION OF REGULATIONS FOR RPS FOR
LOCAL POUS**

Additional submitted attachment is included below.



Roseville Electric
2090 Hilltop Circle
Roseville, California 95747-9704
Reliable Energy. Dependable Service.

BEFORE THE CALIFORNIA ENERGY COMMISSION

In the matter of,

**RPS Enforcement Regulations for Publicly
Owned Utilities**

Docket No. 16-RPS-03

COMMENTS OF ROSEVILLE ELECTRIC UTILITY ON THE 15-DAY LANGUAGE MODIFICATION OF REGULATIONS SPECIFYING ENFORCEMENT PROCEDURES FOR THE RENEWABLES PORTFOLIO STANDARD FOR LOCAL PUBLICLY OWNED ELECTRIC UTILITIES

Roseville Electric Utility (Roseville) appreciates the opportunity to provide comments to the California Energy Commission (CEC or Commission) on the 15-Day Language released July 21, 2020, for *Modification of Regulations Specifying Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities*. Roseville supports many of the changes made in the 15-Day Language, specifically the following:

- Section 3204(d)(2)(H)(3) preserves contractual flexibility for developers and POUs;
- “Continuous” in section 3204(d)(2)(A) has been clarified as referring to the underlying contract term;
- Section 3204(d)(2)(G) has been added to clarify that eligible Portfolio Content Category 3 products shall be classified as long-term.

These changes not only preserve the integrity of the RPS program and advance California’s climate change goals, but also shields ratepayers from the burden of paying for higher cost, higher risk new/repowered renewables in California.

Roseville is also encouraged by the changes made to the wording in section 3204(b)(11); however, the implementation of Senate Bill (SB) 1110 does not yet appear consistent with the intent of the statute, which is to apply on a yearly basis. Roseville requests the CEC make clarifying changes as described in Roseville’s prior comments submitted on June 22 as an administrative change to section 3204 (b)(11).