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**COMMENT OF GOLDEN STATE CLEAN ENERGY ON  
RENEWABLES PORTFOLIO STANDARD REQUIREMENTS FOR  
ENERGY STORAGE DEVICES**

*Additional submitted attachment is included below.*

**BEFORE THE ENERGY COMMISSION  
OF THE STATE OF CALIFORNIA**

*Renewables Portfolio Standard 10th  
Edition Guidebook Update.*

21-RPS-02  
(July 9, 2021)

**COMMENT OF GOLDEN STATE CLEAN ENERGY ON  
RENEWABLES PORTFOLIO STANDARD REQUIREMENTS FOR  
ENERGY STORAGE DEVICES**

Golden State Clean Energy (“GSCE”), the developer of the Westlands Solar Park, appreciates the opportunity to submit this comment on the Commission’s RPS workshop held on February 8, 2022. GSCE supports the Commission’s review of storage participation in the RPS program and immediate program changes to revise RPS requirements that result in inefficient resource development and problems with RPS accounting. Namely, the Commission should modify the RPS treatment of storage to measure just the energy production from the renewable resource and not penalize mixed-fuel projects for losses from energy storage.

California’s grid is experiencing a rapid transformation as energy storage resources are being developed and coming online. This is very desirable from both a grid reliability and GHG policy standpoint. The RPS eligibility requirements need to recognize the policy benefits that storage provides and ensure that RPS counting is not discouraging certain desirable projects or creating disparate treatment among project configurations that equally further state policy. The current rules, however, differentiate between standalone renewable projects and mixed-fuel renewable projects that are paired with storage. A facility that has an energy storage device may count only the generation that is exported to the grid (subtracting storage losses), whereas standalone renewables can count their full output regardless of whether that energy eventually flows through a standalone storage device and incurs round trip efficiency losses. Pairing storage with renewables is an efficient use of the grid and ratepayer resources, and the market is heading in a direction where most new solar is considering adding storage. The RPS rules need to be revised to adapt to these evolving market realities.

Limited changes to the guidebook could be made to quickly eliminate the inefficiency the current storage rules are creating. In addition, the RPS eligibility guidebook could address some of the confusion surrounding storage participation in RPS by including additional diagrams to explicitly address hybrid, co-located, and standalone resource configurations.

GSCE appreciates the Commission’s recognition of the issues surrounding storage participation in the RPS program and the Commission’s decision to review the RPS eligibility guidebook. We

hope the Commission can move forward with revisions to the RPS eligibility guidebook quickly, and we thank the Commission for considering this comment.

Dated: February 22, 2022

Respectfully submitted,

/s/ Daniel Kim

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