

DOCKETED

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Comment Received From: Eric Eberhardt

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University of California comments re: Proposed POU RPS Regulations

Additional submitted attachment is included below.



OFFICE OF THE ASSOCIATE VICE PRESIDENT -
ENERGY AND SUSTAINABILITY

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September 9, 2016

Chair Robert Weisenmiller
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Regarding: Docket No. 16-RPS-03, Regulations for Enforcement Procedures for the Renewables Portfolio Standard (RPS) for Local Publicly Owned Electric Utilities (RPS Regulations)

Dear Chair Weisenmiller,

The University of California (UC) would like to thank you for this opportunity to provide comments on this rulemaking on RPS regulations for Publicly Owned Utilities (POUs).

In support of UC's system-wide goal to achieve carbon neutrality by 2025, our campuses are eager to make extensive use of "voluntary green pricing or shared renewable generation programs" as defined in the proposed regulations. Such programs would allow the University to decarbonize our electricity supplies more quickly than required by current RPS regulations. We have been actively working with the City of Riverside and Sacramento Municipal Utility Company (SMUD) to establish programs for UC Riverside and UC Davis. We anticipate developing similar programs with Los Angeles Department of Water and Power (LADWP) for the UCLA campus.

We support most of the language proposed in Section 3204.b.8. However, we would like to express concern regarding the proposed Section 3204.b.8.C that states "To the extent possible, the electricity products excluded from retail sales shall be procured by the POU from eligible renewable energy resources that are located in the POUs service territory and in reasonable proximity to program participants." While UC understands the intent of the language, we request that this language be deleted or modified, as it would constrain UC and our partner POUs from cost-effectively achieving our goals for increased renewable energy supplies.

UC is striving to develop scalable solutions to make our operations carbon neutral. As such, we have created internal policies to guide our decisions on the procurement of renewable energy supplies. The location of our generation supplies is one factor in our selection process. However, many other factors are equally important. As written, the proposed language in the RPS Regulations would constrain the POUs in their offerings, greatly limiting the choice available for large institutional customers like UC. We anticipate that POUs with small and/or densely populated service territories would be challenged to develop the competitive utility-scale renewable resources within their boundaries required to serve the needs of larger customers.

The University supports comments submitted by the City of Riverside (City) that this would be especially problematic for our UC Riverside (UCR) campus. The City and UCR have developed a contractual arrangement where UCR has the option to call upon the City to deliver increasing volumes of 100% renewable energy to the campus in order for UCR to achieve carbon neutrality by 2025. The City has stated that it will not be possible for them to cost effectively deliver on the current agreement with renewable resources located solely within the City's service territory boundaries.

As a result, UC respectfully requests that the CEC remove or modify the proposed language in section 3204 (b).(8).(C), to accommodate the existing agreement between UCR and the City by clarifying the POUs' ability to procure renewable resources outside of their service territories for voluntary green pricing or shared renewable programs.

We commend the Commission for pursuing these RPS regulations, and we encourage the Commission to finalize and implement them as soon as possible.

Sincerely,

A handwritten signature in black ink that reads "David Phillips". The signature is written in a cursive, flowing style.

David Phillips
Associate Vice President, Energy and Sustainability
University of California - Office of the President

cc: docket@energy.state.ca.us