

**DOCKETED**

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*Comment Received From: Steve Uhler*  
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## **RPS-16-03 Targets each compliance period**

RPS-16-03 Targets each compliance period

Perhaps as Energy Commission staff work to propose the soft targets for the compliance periods after December 31 2030, they will identify that the specified percentage of total kilowatthours sold to the utility's retail end-use customers, each compliance period is the target of 60 (sixty) percent.

To achieve the targets of subdivision (c) of Public Utilities Code - PUC 399.30, the soft targets will have to be based on the compliance period's prior years performance with the final year of the compliance period having a soft target set to achieve the target of the specified percentage of total kilowatthours sold to the utility's retail end-use customers, each compliance period.

Pursuant to Public Utilities Code - PUC 399.30. (a) (1), To fulfill unmet long-term generation resource needs, each local publicly owned electric utility shall adopt and implement a renewable energy resources procurement plan that requires the utility to procure a minimum quantity of electricity products from eligible renewable energy resources, including renewable energy credits, as a specified percentage of total kilowatthours sold to the utility's retail end-use customers, each compliance period, to achieve the targets of subdivision (c).

Amending Title 20 section 3204 will require the calculations to reflect that the targets for each compliance period apply to the whole compliance period and not just the final year of the compliance period.

The number of years in each compliance period may need to be set by each utility to allow the flexibility to match each utility's changes in generation sources.

Utilities that hit targets, with ample delivered renewable energy of greater than 85 (eighty-five) percent and use less than 15 (fifteen) percent unbundled renewable energy credits, may wish short, one or two year compliance periods.

Utilities that miss targets, that deliver renewable energy at less than 85 (eighty-five) percent and use more than 15 (fifteen) percent unbundled renewable energy credits, may wish for compliance periods of 5 (five) years or more.

The specified percentage of total kilowatthours sold to the utility's retail end-use customers, each compliance period for the compliance period beginning January 1, 2011, and ending December 31, 2013 appears in Title 20 3204 (a). All other compliance periods are missing their specified percentage of total kilowatthours sold to the utility's retail end-use customers, each compliance period.

Perhaps staff have overlooked that pursuant to Title 20 Section 3201. (aa), "RPS procurement target" means the specified percentage of retail sales that a POU must procure of electricity products from eligible renewable energy resources for each compliance period as defined in Public Utilities Code section 399.30 (c).

In amending Title 20 Section 3204 (a) please add the specified percentage of retail sales that a POU must procure of electricity products from eligible renewable energy resources for each compliance period as defined in Public Utilities Code section 399.30 (c).

Steve Uhler  
sau@wwmpd.com