

**DOCKETED**

<b>Docket Number:</b>	16-RPS-03
<b>Project Title:</b>	Amendments to Regulations Specifying Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities
<b>TN #:</b>	234584
<b>Document Title:</b>	Imperial Irrigation District Comments - CEC Enforcement Procedures
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Imperial Irrigation District
<b>Submitter Role:</b>	Public Agency
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<b>Docketed Date:</b>	9/3/2020

*Comment Received From: Imperial Irrigation District*  
*Submitted On: 9/3/2020*  
*Docket Number: 16-RPS-03*

**IID Comment Letter - CEC Enforcement Procedures**

*Additional submitted attachment is included below.*



# IID

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September 3, 2020

Chair David Hochschild  
Commissioner Karen Douglas  
Commissioner J. Andrew McAllister  
Commissioner Janea A. Scott  
Commissioner Patty Monahan

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

Docket No. 16-RPS-03

Dear Commissioners:

As a publicly owned utility, Imperial Irrigation District has worked diligently to implement policies that reflect our state's clean energy and climate goals. However, I write today to express great concern with proposed language in pending regulations for the RPS program.

Changes made in the recently released 15-day language would require Commission staff to make determinations on the long-term status of our utility's contracts. We fully understand the statutory provisions related to procurement from long-term contracts as well as ownership agreements. However, we believe the proposed regulatory language does not recognize the responsibility or accountability of our governing board and instead expands the Commission's role. In addition to being a public power provider, IID is also an independent balancing authority and has a responsibility to comply with the state's renewable energy goals, achieve regulatory compliance and ensure the delivery of affordable energy to its customers. Specifically, the proposed 15-day language grants Commission staff added discretion in making a determination on the sufficiency of contract provisions relating to resource quantity, term, and delivery. The absence of any timeline in the proposal may result in added compliance costs and hinders on our responsibilities.

For this reason, we respectfully urge you to reconsider this proposal and work with the public power community to address these concerns. Thank you for your attention.

Sincerely,

Enrique B. Martinez  
General Manager

cc: Assemblymember Eduardo Garcia, A.D. 56