

DOCKETED

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Project Title:	Amendments to Regulations Specifying Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities
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Document Title:	City of Pasadena, Water and Power Department Comments - on Third 15-Day RPS Regulations
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*Comment Received From: City of Pasadena, Water and Power Department
Submitted On: 12/16/2020
Docket Number: 16-RPS-03*

Pasadena Comments on Third 15-Day RPS Regulations

The City of Pasadena, Water and Power is pleased to submit comments on the 15-day Amended RPS Regulations .

Additional submitted attachment is included below.



P A S A D E N A
Water & Power

December 16, 2020

California Energy Commission
Dockets Office, MS-4
RE: Docket No. 16-RPS-03
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET# 16-RPS-03

Submission Type: efile

Subject: Notice of New Public Hearing Date and Notice of Availability of Third 15-Day Language

Pasadena Water and Power ("PWP") appreciates the proposed language in the regulations by the California Energy Commission ("CEC"). We believe the proposed language addresses the concerns brought up by PWP in previous comments. PWP supports the comments filed by the California Municipal Utilities Association ("CMUA") on this subject.

For the implementation of the regulations, PWP is available to assist the CEC in developing templates to streamline the contract review and the annual review processes.

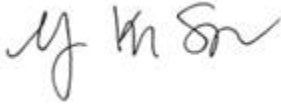
PWP looks forward to working with the CEC to implement the regulations in a programmatic and economically responsible manner. We may seek guidance on the implementation of the Long Term Procurement Requirement, specifically, third party/marketer contracts, grandfathering of contracts, additional reporting requirements, early review of contracts, etc.

Lastly, PWP appreciates the hard work of the CEC Staff on the Third 15-day Language. We appreciate your continued review of our comments and opportunities for feedback.

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Language
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Should you have any questions, please contact me at (626) 744-7493 or
msamra@cityofpasadena.net

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "M K Samra". The signature is written in a cursive, flowing style.

Mandip Kaur Samra
Power Resource Planning Manager