

**DOCKETED**

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*Comment Received From: Jason Maruca  
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Docket Number: 21-RPS-02*

## **City of Burbank Comments**

*Additional submitted attachment is included below.*



**WATER AND  
POWER**

November 1, 2024

California Energy Commission  
Docket Unit, MS-4  
Docket No. 21-RPS-02  
715 P Street,  
Sacramento, CA 95814

**RE: Comments of the City of Burbank on the Notice and Request for Comment on the Proposed Scope for the Draft Renewables Portfolio Standard Eligibility Guidebook, Tenth Edition [CEC Docket #21-RPS-02]**

Dear Commissioner Gallardo and Commission Staff,

The City of Burbank (Burbank) respectfully submits these comments to the California Energy Commission (Commission) on the *Notice and Request for Comment on the Proposed Scope for the Draft Renewables Portfolio Standard Eligibility Guidebook, Tenth Edition* (Proposed Scope), issued on October 18, 2024. Burbank greatly appreciates staff's efforts to identify areas for potential modifications to the RPS Guidebook. Burbank urges the Commission to hold multiple workshops and provide ample opportunity for stakeholder input.

The California Municipal Utilities Association (CMUA) has submitted comments on behalf of its members. Burbank supports these comments and encourages the Commission to implement these proposals to support the Publicly Owned Utilities in California.

Burbank suggests that the Commission expand the scope to clarify how it treats REC production when using renewable energy to create and store hydrogen for use when the energy is more in demand. We urge the CEC to treat REC generation based on the renewable facility's metered generation and not the amount of energy from the electricity used at times when demand/value is highest. Utilities like Burbank are already investing in storage and incurring additional costs to defer electricity usage to when it is needed more. There is no need to add additional costs by further restricting the REC counting.

We urge the CEC to declare green hydrogen an eligible fuel for fuel cells and linear generators. We define green hydrogen as hydrogen created from a zero-carbon resource (wind, solar, hydro, nuclear, etc.).

Finally, we also request that the scope of work include clarification that renewable energy owned by a load-serving entity (LSE) and located on customer property is classified as Portfolio Content Category 1 if it is directly connected to an LSE's utility system and not behind the meter.

Thank You

City of Burbank