

DOCKET	
02-REN-1038	03-RPS-107
DATE	JAN 25 2007
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COMMENTS ON RPS GUIDEBOOK

In furtherance of the Workshop held by the California Energy Commission Docket Nos. 02-REN-1038 and 03-RPS-1078, on January 10, 2007, PacifiCorp respectfully submits the following comments on the Renewables Portfolio Standard Eligibility Guidebook -Staff Draft of December 2006, CEC-300-2006-007ED2SD.

1. Page 29 line 14:

"out-of-state must, in lieu of the foregoing criteria, meet the following criteria to be eligible for the RPS"

This underlined language is suggested to ensure clarity that the two previous sets of criteria for out-of-state facilities set forth in Section D, commencing on page 27, are not in addition to the criteria set forth on page 29 for small multi-jurisdictional utilities.

2. Page 44 lines 4-9:

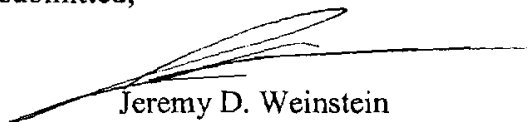
"a) a comprehensive list and description of all applicable California environmental quality laws, ordinances, regulations and standards (collectively referred to as "LORS") that may be directly or indirectly impacted by the facility's development or operation, and b) an assessment as to whether the facility's development or operation will cause or contribute to a violation of any of these LORS in California."

Page 44 line 32:

"Southern California may differ from the air quality standards in Northern California. A facility several states away from California may have no applicable LORS."

The underlined language is suggested to ensure clarity that California is not seeking to apply its environmental laws to the territories of other states, or to govern power plant developments in other states, which are governed by the laws, ordinances, regulations and standards of those other states, except to the extent those power plants have actual physical contact with California land, air or water.

Respectfully submitted,


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