



CALPINE

10350 SOCRATES MINE ROAD
MIDDLETOWN, CALIFORNIA 95461
707.431.6000

March 16, 2007

DOCKET
03-RPS-1078

DATE MAR 16 2007

RECD. MAR 16 2007

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket No. 06-IEP-1c and No. 03-RPS-1078

While listening to the **Workshop on Incentives for Wind Repowering** this past Tuesday, one thought which occurred to us was that most renewable technologies experience the same issues and provide the same benefits as Wind Repowering, so we ask that the Energy Commission consider broadening any resolution or policy on Repowering to include all renewable technologies.

In support of this request we note that under the points in Attachment A of the workshop notice 1) existing geothermal and biomass facilities are (also) currently interconnected and can be brought on line more quickly than resources that require new transmission lines, and 2) the federal production tax credit encourages development of repowered facilities but in many cases makes it difficult to qualify. While repowering these other renewables may not have the same avian impacts as does wind resources, in the case of geothermal we do have information available on the benefits of repowering two of our facilities in 2002. Lastly, it seems to us that more efficiently using the existing resource is consistent with AB-32 and Executive Order S-20-06.

Calpine notes its appreciation that the CEC staff added Item 11 to Attachment A to begin the discussion of behind-the-meter RECs. We believe that formalizing a process for behind-the-meter RECs will recognize and quantify a benefit which is already being realized by the environment. We look forward to working with CEC and WREGIS on this topic in the future.

Sincerely,

Dean Cooley
Director, Asset Management

cc: John Farison, Geysers Director Govt/Reg