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To: "Heather Raitt" <Hraitt@energy.state.ca.us>, <docket@energy.state.ca.us>
Date: 10/3/2007 5:12 PM
Subject: Comments on RPS Eligibility Staff Draft Guidebook; third edition

CC: "Denniston, Derek C (Energy supply)" <DCDg@pge.com>, "Lee, Evelyn C (Law... Heather-

On behalf of Horizon, I am pleased to submit the following comments to on RPS Eligibility Staff Draft Guidebook; third edition dated September, 2007:

1) page 30, Section II, E, Delivery Requirements second paragraph: insert "/or" between "banked and shaped", strike "to allow delivery of a "firmed" product into California" and insert "within the calendar year" at the end of the sentence. The revised sentence would read: "In practical terms, out-of-state energy may be "banked and/or shaped" within the calendar year."

Page 31, Section II,E, Delivery Requirements footnote 11: add "or non firm" after firm in each of the examples 1 and 2.

My concern here is to not limit the banking and shaping to firmed energy as it can be non firm as well.

2) page 39, Section III, B, Renewing Certification and Pre-Certification, first paragraph and other places where this concept is referenced: insert "other than wind energy [insert other technologies which this would also apply to], which will not be required to renew its certification but will be required to provide updates to the CEC each time there is a change in ownership or a change in the facility size."

Please feel free to contact me if you have any questions regarding Horizon's comments.

Best Regards,

Brenda

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