

Written comments of Gregory Archbald

Re: Docket numbers **No. 09-IEP-1G** and **No. 03-RPS-1078** and **Draft Report on Renewable Energy "Feed-In" Tariffs**

Dear CEC staff,

I commend the CEC for its recent workshop and effort to develop a "recommended policy path for expanded feed-in tariffs in California."

Developing effective responses to the threat of disruptive global climate change is perhaps the single greatest work of our times. I am a concerned citizen, a member and supporter of the Environmental Defense Fund, and a career-long conservationist. I was co-founder and first general counsel of The Trust For Public Land; now retired and living in Nevada City, CA.

I strongly support setting feed-in tariffs for renewable energy based on the cost of generation plus a reasonable profit. This is the essence of successful program in Europe and it should be at the heart of a program adopted in California.

In addition, I have these detailed comments, based on recommendations made by the wind energy and feed-in tariff expert, Paul Gipe:

1. Drop the 20MW project size limitation.
2. Contract terms should be no less than 20 years.
3. Inflation protection should be primarily for protecting capital at risk.
4. Give greater attention to the French system of differentiated tariffs for wind energy or the proposed variation in Ontario, Canada.
5. Include *resource intensity* (in applicable technologies) as well as technology and size in setting tariff differentiation. As Paul Gipe says, "The latter is an absolute necessity for wind energy, especially development by farmers and community groups who can't migrate to the windy passes."
5. " Degression should be use only sparingly if at all."

Thank you,

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