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DOCKET

03-RPS-1078

DATE JUL 08 2010

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July 8, 2010

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 03-RPS-1078
Re: Docket No. 02-REN-1038
1516 Ninth Street
Sacramento, CA 95814-5512

**RE: California Energy Commission Draft 2006 Procurement Verification Report;
Comments of the Center for Resource Solutions Regarding CPUC TRECs Decision**

Dear Commissioners,

Center for Resource Solutions ("CRS") appreciates the opportunity to provide comments on the **Draft 2006 Procurement Verification Staff Report** ("Draft 2006 Report").¹ On April 3rd, 2009, February 16th, 2010, and April 20th, 2010, CRS submitted comments relating to the treatment of RECs from Mountain View I and II wind facilities ("Mountain View") and Southern California Edison's ("SCE") RPS obligations. CRS supports the treatment of these critical issues put forth in the Draft 2006 Report, wherein generation from Mountain View is ineligible for compliance with the California RPS by SCE, regardless of any California Public Utility Commission ("CPUC") decision on the use of TRECs for RPS compliance, specifically CPUC Order D 10-03-021. Such a determination by the California Energy Commission and the CPUC will ensure the integrity of thousands of contracts and marketing claims, and provide stability in the voluntary renewable energy market, as well as clear guidance for the entities subject to the California RPS.

Thank you for your consideration.

Sincerely,

Alex Pennock
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Center for Resource Solutions
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¹ Barkalow, Gina, Theresa Daniels, Lorraine Gonzales. 2010. *Renewables Portfolio Standard 2006 Procurement Verification Draft Staff Report*. California Energy Commission. CEC-300-2009-006-SD