

**STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION**

DOCKET
02-REN-1038

DATE	NOV 26 2010
RECD.	NOV 26 2010

In the matter of:

Implementation of Renewables Portfolio Standard
Legislation

and

Implementation of Renewables Investment Plan
Legislation

Docket No. 03-RPS-1078

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**COMMENTS OF THE SOLAR ALLIANCE ON
RENEWABLES PORTFOLIO STANDARD ELIGIBILITY GUIDEBOOK
AND THE OVERALL PROGRAM GUIDEBOOK FOR THE RENEWABLE ENERGY
PROGRAM**

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November 26, 2010

Attorneys for the Solar Alliance

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The Solar Alliance¹ appreciates the opportunity to comment on the Renewables Portfolio Standard Eligibility Guidebook and the Overall Program Guidebook for the Renewable Energy Program. The *RPS Guidebook* describes the eligibility requirements and process for certifying renewable resources as eligible for California's RPS and describes how the Energy Commission verifies compliance with the RPS. The *Overall Guidebook* describes specific aspects of how the Renewable Energy Program is administered. While the Solar Alliance has previously provided comments in this process, it submits these additional comments in order to address one minor clarification to the RPS Guidebook.

I. COMMENTS

The RPS Guidebook should be revised to clarify the requirements associated with systems that are specific to the program established under SB 32. As currently drafted, the

¹ The comments contained in this filing represent the position of the Solar Alliance as an organization, but not necessarily the views of any particular member with respect to any issue.

Guidebook language could be misinterpreted such that provisions intended to apply solely to SB 32 systems are made applicable to other systems. To ensure clarity, the Solar Alliance recommends the following changes in language:

The passage of SB 32 and AB 920 allows the Energy Commission to expand the RPS eligibility of distributed generation for some facilities that have received ratepayer-funded incentives in the past or are participating in a net metering tariff. Senate Bill 32 creates a new tariff for facilities up to 3 MW and provides for generation from such facilities to be RPS eligible. Facilities that *participate in SB 32 and have* received ratepayer-funded incentives may now be RPS eligible if it has been demonstrated to the CPUC, or applicable authority, that the facility has provided sufficient benefit to the ratepayers or has repaid the funds it has received, and it enters into a new tariff or standard contract after exiting its net-metering tariff, if applicable. Once the CPUC has provided guidance for reimbursement of ratepayer funds or on how it will determine that the facility has provided sufficient benefit to the ratepayers, the Energy Commission will address the eligibility of these facilities in a future revision to this guidebook.²

II. CONCLUSION

The Solar Alliance appreciates the opportunity to present its comments on the RPS Guidebook and respectfully urges the Commission Staff, as it prepares the final revisions to the RPS Guidebook for Commission vote, to revise the RPS Guidebook to clarify Section 2 is specific to SB 32 systems as set forth above.

² RPS Guidebook at p. 7

Respectfully submitted this November 26, 2010, at San Francisco, California.

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