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03-RPS-1078

DATE JUL 08 2011

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**THE STATE OF CALIFORNIA
BEFORE THE
CALIFORNIA ENERGY COMMISSION**

In the Matter of:)
)
Renewable Portfolio Standard) Docket No. 03-RPS-1078
)
)

**COMMENTS OF
PITTSBURG POWER COMPANY DBA ISLAND ENERGY**

Pursuant to the procedures established by the California Energy Commission (“Commission” or “CEC”) by written notice issued June 7, 2011, as amended at the Staff Workshop held June 17, 2011, the staff of Pittsburg Power Company doing business as Island Energy on Mare Island in Vallejo, California respectfully submits these Comments on the scope and schedule for renewable portfolio standard (“RPS”) regulations applicable to local publicly-owned electric utilities (“POU”).

Island Energy supports and agrees with the comments provided separately by the California Municipal Utility Association (“CMUA”). As a very small utility with an average load of approximately 4 megawatts, Island Energy urges the Commission to consider the impact the rules it crafts for implementation of RPS goals will have on small utilities. We support the intended goals of SB 2 (1X) and look forward to developing a plan that will allow us to fulfill them in a cost effective manner. However, Island Energy hopes the Commission recognizes the extra burden SB 2 (1X) and its associated accounting requirements place on utilities with small administrative staffs and will provide for appropriate flexibility.

Dated: July 8, 2011

Respectfully submitted,
Peter Guadagni
General Manager
Island Energy