



Sierra Pacific Industries

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October 31, 2011

RE: Docket Numbers 02-REN-1038 and 11-RPS-01

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DOCKET

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Comments of Sierra Pacific Industries
on the
Staff Draft
of the

Fifth Edition of the Renewables Portfolio Standard Eligibility Guidebook.

Sierra Pacific Industries (SPI) is pleased to have the opportunity to provide these comments on the Staff Draft of the Fifth Edition of the Renewables Portfolio Standard Eligibility Guidebook. SPI appreciates the level of effort expended by staff to revise the guidebook to conform with recent changes to the Public Utilities Code of the State of California, and suggests only one, minor modification to the draft.

SPI's primary business is the manufacture of forest products. We operate five saw mills in California and two in Washington that utilize saw mill residue to fire boilers to raise steam for use in kilns to dry lumber and to generate electricity. Some of that electricity is consumed onsite by the industrial processes associated with saw mill activity and excess generation is sold through bilateral agreements.

This edition of the guidebook explicitly recognizes that unbundled or tradable RECs associated with onsite load served by CEC certified RPS-eligible generation may be used for RPS compliance subject to certain conditions.

Specifically, the draft states at the second paragraph of Section F, that "Applicants wishing to certify a renewable facility that serves onsite load must meet all RPS eligibility requirements in the fifth edition of this guidebook including, but not limited to, participation in WREGIS and reporting eligible generation based on a meter with an independently verified accuracy rating of 2 percent or higher accuracy."

SPI wishes to point out that the physical reality of an industrial facility, such as a saw mill, may not lend itself to the use of a single meter, but instead may require multiple meters to capture eligible onsite load. This circumstance is recognized by WREGIS in its Operating Rule 9.6

In order to accommodate the circumstance referred to above SPI requests that the second paragraph of Section F be modified as follows:

"Applicants wishing to certify a renewable facility that serves onsite load must meet all RPS eligibility requirements in the fifth edition of this guidebook including, but not limited to, participation in WREGIS and reporting eligible generation based on a meter [or meters](#) with an independently verified accuracy rating of 2 percent or higher accuracy."

Thank you for your consideration of this matter.

A handwritten signature in black ink, appearing to read "D. Branchcomb". The signature is fluid and cursive, with a large initial "D" and "B".

David R. Branchcomb
Sierra Pacific Industries
Power Contracts