

May 2, 2012

California Energy Commission
Docket Office, MS-4
Re: Docket No. 11-RPS-01 and
Docket No. 02-REN-1038
RPS Proceeding
1516 Ninth Street
Sacramento, CA 95814-5512

**Re: Proposed Revisions to the Renewables Portfolio Standard
Eligibility Guidebook (Docket No. 11-RPS-01 and Docket No.
02-REN-1038)**

Southern California Edison Company (“SCE”) respectfully offers these comments to the California Energy Commission (“Energy Commission”) on the proposed revisions to the Renewables Portfolio Standard Eligibility Guidebook (“RPS Guidebook”). As discussed below, SCE urges the Energy Commission to make a few minor revisions to the RPS Guidebook.

**A. The Energy Commission Should Clarify the October 1, 2012 Certification
Deadline for Utility-Certified Facilities**

Under Section III, Certification Process, the RPS Guidebook states that the RPS certification of facilities certified by a utility on the CEC-RPS-2 form prior to the adoption of the Renewables Portfolio Standard Eligibility Guidebook, Fourth Edition, is void in the event the facility’s contract with the utility expires, is voluntarily extended, or is otherwise renegotiated.¹ The RPS Guidebook further provides that if the facility operator, or agent thereof, submits an application for certification to the Energy Commission by October 1, 2012, then the utility may continue to count the generation under contract with such facility toward the RPS.² However, it is not clear whether October 1, 2012 is a deadline that must be met by all utility-certified facilities regardless of when their contract actually expires, is extended, or renegotiated. SCE asks the Energy Commission to clarify the intent of the October 1, 2012 deadline in order for all market participants to have clear guidance on how to comply with this requirement.

¹ Revised RPS Guidebook at 79.

² *Id.*

B. The Methodology for Measuring Contributions of Multiple Fuels Should Be Revised

With respect to the preapproved methods for measuring the contribution of each fuel or energy source in renewable facilities using multiple energy sources that are noncombustion, thermal technologies, it is not clear if the intent under option (a)³ is to reward or penalize facilities with a high-conversion efficiency rate. As the equation stands, high-efficient facilities are penalized with a lower percentage output from renewables and low-efficient facilities are rewarded with a higher percentage output from renewables.

Under the current methodology of option (a), when calculating the percentage of output from renewables, operators have the option to choose either their facility's actual conversion efficiency rate or 0.425. A facility with a conversion efficiency rate greater than 0.425 is driven to use the lower rate of 0.425; while a low-efficient plant would be better off using their lower conversion efficiency rate because, as calculated by the equation under option (a), it yields a higher output from renewables. For example, a facility using 100 MMBTUs of non-renewable fuel, producing 100 MWh with a conversion efficiency rate of 0.425 would yield 87.5 percent output from renewables. Whereas, a facility using the same amount of non-renewable fuel and producing the same amount of MWh, but with a conversion efficiency rate of 0.47, yields only 86 percent output from renewables.

This methodology seems to contradict the value provided by facilities with high conversion efficiency rates. Accordingly, SCE recommends the following revision to this method of measuring the contribution of multiple fuel sources, which removes judgment on the conversion efficiency rate:

(eff)plant = The actual conversion efficiency of the facility

C. The Energy Commission Should Correct the RPS Guidebook's Discussion of WREGIS ID Numbers

Finally, the last sentence of footnote 122 in the RPS Guidebook states that applicants must register with and be approved by WREGIS to receive a WREGIS ID number.⁴ This statement should be corrected. A WREGIS ID is generated as soon as the online registration form is submitted and remains the same as the registration moves from pending to approved status.

³ See *id.* at 48.

⁴ *Id.* at 78.

SCE appreciates this opportunity to comment. For all the foregoing reasons, SCE requests that the Energy Commission make the modifications suggested above to the RPS Guidebook.

Very truly yours,

/s/ Manuel Alvarez

Manuel Alvarez