



**Pacific Gas and
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VIA E-MAIL
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California Energy Commission
Dockets Office, MS-4
Re: Docket No. 11-RPS-01
And Docket No. 02-REN-1038
RPS Proceeding
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED
02-REN-1038

TN # 66150

JUL 06 2012

Re: Comments of Pacific Gas and Electric Company on the Proposed 6th Edition of the RPS Eligibility Guidebook

Pacific Gas and Electric Company ("PG&E") appreciates the opportunity to provide comments on the Draft of the Renewables Portfolio Standard ("RPS") Eligibility Guidebook (6th Ed.) (the "Guidebook"), which is on the agenda for discussion at the California Energy Commission's ("Commission") Business Meeting scheduled for July 11, 2012.

PG&E supports the proposed revisions to the Guidebook as additional and incremental improvements. In particular, PG&E appreciates changes that recognize a prior inconsistency with the RPS statute in the description of renewable energy resources connecting outside of a California Balancing Authority but within the Western Electricity Coordinating Council.

PG&E continues to believe that additional changes and revisions should be made to the Guidebook, including the following: (1) the burdensome and costly RPS eligibility criteria for surplus generation from net metered customers under Assembly Bill ("AB") 920 should be revised; (2) the Guidebook should provide regulatory certainty once precertifications for RPS eligibility have been approved; (3) the Guidebook needs to better distinguish between sub-categories of RPS-eligible hydroelectric facilities; (4) the Guidebook should provide additional clarity concerning what "significant" change in the use of fuel at a multifuel facility requires amendment of an RPS certification; and (5) the Commission should change the RPS reporting deadline from June 1 to July 1 of each year for the prior year's generation. Each of these recommended changes, in addition to other minor or technical recommended changes not yet

adopted, is described in more detail in the comments that PG&E filed in these dockets on May 2, 2012 concerning adoption of the 5th Edition of the Guidebook.

While PG&E urges the Commission to make these additional changes in the next edition of the Guidebook, PG&E supports the proposed changes in the 6th Edition as incremental, necessary improvements and recommends their adoption.

Best regards,

/s/

M. Grady Mathai-Jackson

cc: Valerie Winn, PG&E
John Pappas, PG&E