

From: [Jewell Hargleroad](#)
To: [Energy - Docket Optical System;](#)
Subject: Comment on the 33% RPS, Docket # 11-RPS-01
Date: Monday, September 17, 2012 12:11:57 PM

Sep 17, 2012

California Energy Commission
CA

Dear Energy Commission,

This is to urge you to establish a strong and transparent renewable energy program for the state's publicly owned utilities (POUs).

According to a new report by the Union of Concerned Scientists, some utilities are on their way towards reaching the 2020 goals, while others have a lot to do to catch up. The California Energy Commission can help keep utilities on track by holding them accountable to make progress between compliance periods, and take actions to reduce perceived hurdles to reaching 33 percent renewables by 2020. This goes to your siting program too. Unless just recently modified, your "alternative" section for thermal gas fired power plants fails to seriously consider sustainable alternatives and how else production may be achieved, such as roof top solar. Likewise, presently the determination of "need" lies in the hands of the CPUC, while the CEC siting analysis ignores existing plants if the procurement contract has expired. In order to really achieve reduction of carbon emissions, there needs to be a real analysis on the need for dirty thermal fossil fuels plants.

This likewise relates to the necessity for the commission to specify how the utilities will make "reasonable progress" in their efforts to gradually increase their use of renewable energy between now and 2020, rather than being allowed to wait and then attempt to buy all their renewable power at the last minute. They can submit this kind of information in the annual reports that state law requires the utilities to file with the commission.

Thanks again for your leadership. Regarding Docket Number 11-RPS-01, please do all you can to ensure there is strong oversight in how California's POUs comply with the state's vitally important renewable energy standard.

Sincerely,

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