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March 22, 2013

California Energy Commission
Dockets Office, MS-4
Re: Docket Nos. 11-RPS-01; 02-REN-1038
RPS Proceeding
1516 Ninth Street
Sacramento, California

RE: Proposed Changes to the Renewable Portfolio Standard (RPS) Eligibility Guidebook

Dear Members of the Commission and Staff,

The Geothermal Energy Association (GEA) appreciates the opportunity to comment on the Proposed Revisions to the Renewable Portfolio Standard Eligibility Guidebook (Seventh Edition, Staff Draft Guidebook). The proposed revisions were discussed at the CEC workshop March 14, 2013.

We support clarifying the definition of station service to align it with FERC's definition. This makes clear that station use does not include the extraction of fuel and transportation. Not only does this approach maintain a measure of regulatory certainty/consistency across regulatory agencies (federal/state), but this is a critical issue for geothermal development. To the extent that adjacent operating plants share common infrastructure the energy consumed to operate those common facilities should be allocated between each in proportion to their use.

GEA thanks the CEC for the opportunity to comment on the Draft Renewable Portfolio Standard Eligibility Guidebook, Fifth Edition.

Sincerely,

A handwritten signature in black ink, appearing to read "Karl Gawell". The signature is fluid and cursive, with the first and last names being more prominent.

Karl Gawell
Executive Director