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California Energy Commission  
Dockets Office, MS-4  
RPS Proceeding  
1516 Ninth Street  
Sacramento, CA 95814-5512

California Energy Commission

**DOCKETED**  
**11-RPS-01**

TN # 70033

MAR. 22 2013

Re: Docket No. 11-RPS-01 and Docket No. 02-REN-1038

Gentlemen,

U.S. Geothermal (USG) has reviewed the Renewables Portfolio Standard Eligibility, Seventh Edition, Staff Draft Guidebook that is currently under public review.

Our comment relates to page 129 and the definition of “Station Service”. The Federal Energy Regulatory Commission (FERC) has established the definition of Station Service. The FERC definition provides consistency for all power plant operators and from state to state. An alternative definition has the potential to cause unnecessary confusion and conflicts.

USG recommends that the CEC adopt the Federal Energy Regulatory Commission’s definition of “Station Service”. Specifically, “Station Service is the electric energy used for the heating, lighting, air-conditioning, and office equipment needs of the buildings on a generating facility’s site, and for operating the electric equipment that is on the generating facility’s site such as lights, fans, pumps, electric motors, instrumentation, and pollution control equipment. Station service does not include fuel delivery loads such as compressor station loads for pipeline gas; gathering system loads for landfill gas; collection, transportation, chipping and processing of biomass fuel; pumping loads for delivery of water to fuel a geothermal field; and pumping loads to extract and transport geothermal fluids from a geothermal field.”

Thank you for the opportunity to comment.

*/Scott H Nichols/*

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