

**ATMOCEAN, INC. & OCEAN HYDROPOWER SYSTEMS LTD.**

Comments Regarding California Energy Commission  
Proposed Changes to the Renewables Portfolio Standard Eligibility Guidebook

Slide 19 of the Workshop Proceedings contains the following text:

**Proposed Revisions: *Facility Requirements***

19

**Energy Storage –New Sub-Section**

- Integrated storage devices must only be capable of storing energy from the RPS-eligible generation facility and from no other energy inputs.
- Storage devices not integrated must be located and metered as the same facility and owned by the same entity to be considered as part of the RPS-eligible generation facility. Meter must measure the total output of the storage device and the renewable generator as if it were a single facility.
- Electricity from the renewable generator to the storage device is treated as internal power flow and cannot produce RECs.
- The ratio of renewable fuel to conventional fuel used to generate electricity would be applied to the output of the facility.

We want to alert the Commission of future energy generation & storage architectures, specifically ocean wave energy generation & storage as sketched below, and urge the Commission to adopt very generalized definitions of energy generation, and storage, so that future innovative and “different” concepts are not disadvantaged.

Comments or questions may be sent to:

Philip Kithil  
CEO  
Atmocean, Inc.  
1274 Vallecita  
Santa Fe, NM 87501 USA  
[atmocean.kithil@gmail.com](mailto:atmocean.kithil@gmail.com)  
505-310-2294

Figure 1 – Wave Energy System Overview

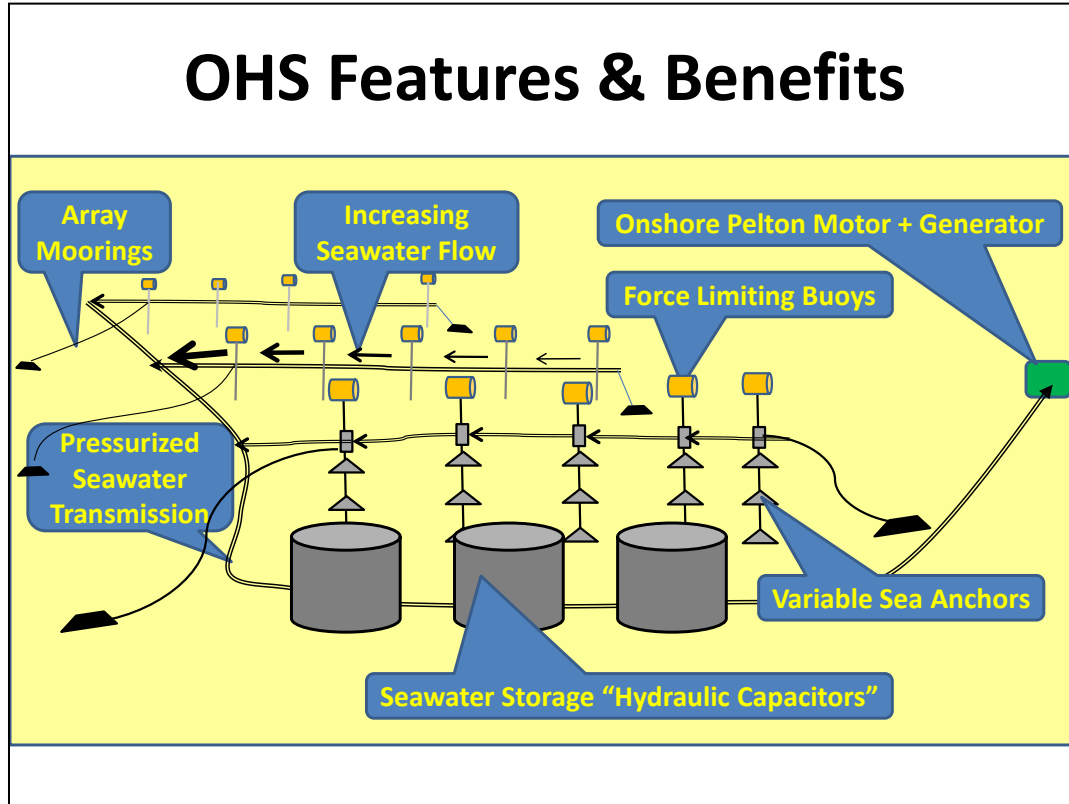


Figure 2 - Energy Storage System Components – Offshore Wave Energy Technology

