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April 25, 2013

California Energy Commission Dockets Office, MS-4 RPS Proceeding 1516 Ninth Street Sacramento, CA 95814 DOCKETED
02-REN-1038

TN # 70453

APR. 25 2013

RE: Docket Number 11-RPS-01 & Docket Number 02-REN-1038, Developing Regulations and Guidelines for the 33 percent Renewables Portfolio Standard

## Greetings:

Global Geothermal Ltd and its subsidiary Recurrent Engineering LLC are technology suppliers to the geothermal power industry. Accordingly, we are following the events and discussion associated with "station service" with great interest and concern.

We strongly recommend that the CEC adopt the Federal Energy Regulatory Commission's definition for "station service." This fair and well established definition importantly provides clear and consistent guidelines to the industry, regardless of project location. We simply cannot imagine what benefit a change from the existing national standard would provide.

Thanks for the opportunity to present our opinion. Please feel free to contact me for further discussion.

Sincerely,
GLOBAL GEOTHERMAL & RECURRENT ENGINEERING

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Bruce Levy Chief Executive