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April 25, 2013

California Energy Commission
Docket Office
1516 Ninth Street
Sacramento, California 95814-5512

RE: Docket Numbers 11-RPS-01 and 02-REN-1038, Developing Regulations and Guidelines for the 33 Percent Renewables Portfolio Standard Proposed Changes to the Renewable Portfolio Standard (RPS) Eligibility Guidebook

Dear Members of the Commission,

The Geothermal Energy Association (GEA) wishes to call to the Commission's attention a proposal in the "Proposed Revisions to the Renewable Portfolio Standard Eligibility Guidebook" which we urge you to correct.

As we expressed in our earlier comments filed on March 22, GEA 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.

We appreciate the efforts of the staff in preparing the Draft Renewable Portfolio Standard Eligibility Guidebook, but we believe the proposed treatment of station service would add additional costs to geothermal projects in the state unfairly burdening the industry. California receives significant benefit from its geothermal power, and CEC should be seeking to encourage its expansion. GEA just today has released a new report showing that "geothermal provides approximately \$117 million in externality benefits per year to the states of Nevada and California by avoiding fossil fuel emissions."

Sincerely,

A handwritten signature in black ink, appearing to read "Karl Gawell", written in a cursive style.

Karl Gawell
Executive Director