

Public Utilities Department
Resources Division

California Energy Commission

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May 6, 2013

California Energy Commission
Dockets Office, MS-4
Docket No. 13-RPS-01
RPS Proceeding
1516 Ninth Street
Sacramento, CA 95814-5512

RE: The City of Riverside Comments on Proposed Regulations: Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities

The City of Riverside (Riverside) appreciates the opportunity to provide further comments on the *Proposed Regulations: Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities* (Proposed Regulations), issued on April 19, 2013. Riverside is very appreciative that CEC staff have carefully considered comments made by California Municipal Utilities Association (CMUA) and Southern California Public Power Authority (SCPPA) in general and Riverside's comments in particular and made some substantive changes that addressed Riverside's concerns. The comments below provide Riverside's remaining recommendations.

A. General Comments

Riverside supports the comments provided by California Municipal Utilities Association (CMUA) and Southern California Public Power Authority (SCPPA) in this proceeding and urges the Commission to incorporate them in the final regulations.

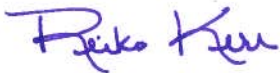
B. Historic Carry-Over Provisions

Riverside is very appreciative that the Commission considered our concerns regarding the 36-month REC retirement requirement and removed Section 3206 (a) (5) (E) in the proposed regulations as Riverside recommended. The proposed regulations strike a proper balance between the reality that some of the RECs that POUs eligible for historic carryover purposes are currently not retired within WREGIS or tracked through WREGIS, and the need to avoid double counting of these RECs. Riverside urges the Commission to adopt changes to historic carryover provisions in the proposed regulations.

C. Grandfathered Electricity Products

Riverside remains concerned that the Commission did not consider our comments regarding the categorization of pre-June 1, 2010 RPS contracts. However, Riverside is mindful that time is short for further deliberations before the Commission needs to put into place these regulations to provide the needed certainty to POUs for RPS compliance purposes. Nevertheless, Riverside urges the Commission to continue the dialogue with POUs and reconsider this issue in future revisions to the regulations.

Respectfully submitted,



Reiko Kerr

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