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September 9, 2013

California Energy Commission  
Dockets Office, MS-4  
**Re: Docket No. 11-RPS-01**  
RPS Proceeding  
1516 Ninth Street  
Sacramento, CA 95814-5512

Submitted by email to: [docket@energy.ca.gov](mailto:docket@energy.ca.gov) and [RPS33@energy.ca.gov](mailto:RPS33@energy.ca.gov).

Dear CEC,

Geothermal power projects are unique. They seek to tap the energy within the earth, and are expanding their application by developing geothermal technology that can increasingly use lower temperature resources. This has resulted in the expanded use of binary power plants, and it is expected that some modification of a binary power plant will be utilized with Enhanced Geothermal Systems technology as it develops.

Unfortunately, the approach CEC is taking will impose increased penalties on the very geothermal technologies -- lower temperature binary power systems -- that are expanding its use, lowering its emissions, and offering the greatest future energy potential. Notably, this type of geothermal powerplant has essentially zero greenhouse gas emissions.

Also, excluding the power used for fluid delivery will not provide an incentive for plant efficiency. The need to pump a well-field is not a factor of the efficiency of a power plant but is more an issue of the temperature and pressure of the resource. So, there is no inherent benefit to exclude energy used to move hot geothermal fluid from the well to the power plant from receiving REC's.

Simply put, the energy used to pump wells and deliver geothermal fluid to the power plant are not parasitic. It is symbiotic. Without the fuel, the geothermal power plant would simply not produce electricity.

Thus, we would urge the California Energy Commission to exclude the energy used to move the geothermal fluid from the underground resource to the power plant from being considered as "station usage." To do otherwise would be to penalize geothermal technologies that the state should be seeking to promote as it expands California's commitment to carbon free power. We understand this is consistent with the position FERC policies, as well.

Sincerely,

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

Karl Gawell, Executive Director