

**Geysers Power Company, LLC**

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California Energy Commission

**DOCKETED**  
**11-RPS-01**

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

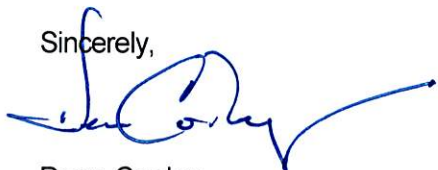
Geysers Power Company, LLC (GPC) appreciates this opportunity to provide comments on the Staff Workshop on Station Service in the Renewables Portfolio Standard Program, and GPC wishes to thank staff for its efforts in organizing and holding the recent workshop.

GPC agrees with the presentations and comments at this workshop saying that because of the many different electric generation technologies and power cycles it may never be possible to develop a concise, standard definition of station service. And we welcome the open and collaborative discussion that took place at this workshop.

However, GPC does not support Staff's recommendation in the Conclusion of **Appendix A: Station Service** that "further clarification regarding how to apply the definition of station service [as it applies to California RPS] be deferred to the WREGIS Administrator." While we understand the RPS requirement to register with WREGIS, and GPC actively works with the WREGIS Administrator and her staff and participates in the WREGIS Stakeholder Advisory Committee, we do not believe that the WREGIS Administrator is in the best position to, in many respects, determine California RPS policy and business outcomes.

Thank-you for considering our comments.

Sincerely,



Dean Cooley  
Director, Asset Management  
Geysers Power Company, LLC  
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