



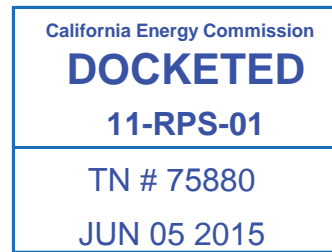
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**VIA E-MAIL**  
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California Energy Commission  
Docket Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: Docket No. [11-RPS-01] --Pacific Gas and Electric Company's Comments on Staff Final Renewables Portfolio Standard Eligibility Guidebook, Eighth Edition

Pacific Gas and Electric Company ("PG&E") submits these comments on the Staff Final version of the California Energy Commission's ("Energy Commission") Renewables Portfolio Standard Eligibility Guidebook, Eighth Edition ("Guidebook"). The Staff Final version of the Guidebook incorporates most of PG&E's February 17, 2015 comments on the previously circulated Staff Draft version. However, it overlooks PG&E's suggestions concerning the inclusion of energy storage devices within Renewable Energy Resource facilities. PG&E takes this opportunity to refine its comments and hopes that they will be reflected in the Guidebook as ultimately adopted by the Energy Commission.

On page 43 of the Staff Final Guidebook, Section III.F. (Energy Storage) describes two scenarios by which a storage device may be used in the delivery of energy from a renewable resource to the grid. The first scenario involves the integration of the storage device into the renewable facility, so that the device only stores energy generated by the renewable generator. The facility's exports should all be renewable in this case.

The second arrangement is one in which the energy storage device is "Directly connected to the facility, such that electricity is delivered to the energy storage device behind the meter used for RPS purposes and any electricity from a source other than the renewable generator is included as an energy input to the facility." Under this scenario, the storage device may be charged from the grid, in which case the facility is a "Renewable Resource Using Multiple Energy Sources" as described in Section III.B. PG&E recommends the addition of the following text, to integrate the multiple energy source requirement into this energy storage-specific section:

If the storage unit is capable of being charged from the utility grid, the facility must comply with the “dual fuel” requirement for exports from the facility set out in Section III.B. by identifying the renewable energy output either through direct measurement as described in Section III.B.1 (a) through III.B.1(c)(1) or by counting only the electricity leaving the facility in excess of the imported grid electricity as described in Section III.B.1(c) (2).

The CEC should be aware of a certain counting issue associated with Net Energy Metered (“NEM”) renewable generators paired with storage. Exports of NEM renewable generation to the grid are eligible for NEM credit, i.e., compensation at the retail rate. However, exports from a NEM-paired storage facility measured in real time could be derived from either the grid or the NEM generator,<sup>1/</sup> and therefore, may or may not be eligible for NEM credit. The Guidebook provides for an annual eligibility determination for net exports from a renewable facility. PG&E is concerned that the amount of renewable generation eligible for NEM credit might be counted incorrectly due to the difference between the CEC’s one-year netting interval for determining the eligibility of output for the RPS program and the real-time basis of NEM credit eligibility. PG&E intends to clarify this matter in the CPUC rulemaking on NEM, R.14-07-002.

PG&E withdraws its recommendation regarding station power associated with energy storage, as this issue will be taken up by the California Public Utilities Commission in its energy storage rulemaking (R.15-03-011.)

Thank you for your consideration of these comments.

Sincerely,

*/s/ Evelyn C. Lee*

Evelyn C. Lee

ECL/dl

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1/ Or any combination of the two, especially for storage systems under 10 kW where separate metering of the NEM generator is not required.