

STATE OF CALIFORNIA

ENERGY RESOURCE CONSERVATION AND DEVELOPMENT COMMISSION

In the matter of:

Developing Regulations and Guidelines for the 33
Percent Renewables Portfolio Standard.

Docket No. 11-RPS-01

California Energy Commission

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**COMMENTS OF PACIFICORP ON THE STAFF FINAL EIGHTH EDITION OF THE
RENEWABLES PORTFOLIO STANDARD ELIGIBILITY GUIDEBOOK**

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PacifiCorp appreciates this opportunity to provide comments on the California Energy Commission's (Commission's) staff final eighth edition of the *Renewables Portfolio Standard Eligibility Guidebook* (RPS Guidebook) released on June 1, 2015. PacifiCorp thanks staff for its careful consideration of PacifiCorp's February 17, 2015 comments on the RPS Guidebook and commends staff for the thoughtful and clarifying revisions made to the RPS Guidebook.

The updated RPS Guidebook incorporates PacifiCorp's feedback to provide clarity that off-line station service should not be netted against the total generation of a Generating Unit. This more appropriately ensures that renewable energy is allowed to count for the RPS program, and that station service will not be deducted from total generation when renewable energy credits (RECs) are not being generated, consistent with the overall goals of the RPS program.

PacifiCorp also appreciates the updates to the RPS Guidebook to provide additional clarity about REC reporting required at the various agencies. Specifically, new footnote 111¹ to the RPS Guidebook now provides clarity to load serving entities (LSEs) that use of a REC for

¹ This is the footnote number in the underline/strikeout format version of the RPS Guidebook. This is footnote number 35 in the clean format version.

RPS compliance does not preclude that LSE from using that same REC to report a specified import or use the RPS adjustment in accordance with the California Air Resources Board's (CARB) Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Regulation or MRR) and Cap-and-Trade Regulation. This clarification is helpful as it will avoid confusion between regulatory agencies and ensure that a REC may be used for other regulatory compliance purposes as required by CARB. Although the updated RPS Guidebook did not modify the REC definition as requested by PacifiCorp to make clear that use of RECs for the RPS program will not restrict an LSE's ability to claim those same RECs for an RPS adjustment under the CARB Cap-and-Trade Regulation, PacifiCorp believes footnote 111 of the RPS Guidebook provides sufficient clarity about the use of RECs.

Finally, though the RPS Guidebook was not modified to specifically address how renewable electricity transferred between balancing authorities under the western Energy Imbalance Market (EIM) will qualify for the RPS program, the RPS Guidebook was modified to list this as an outstanding issue to be addressed in the future. PacifiCorp looks forward to working with the Commission, the California Independent System Operator, and the California Public Utilities Commission to determine how RECs associated with electricity scheduled under the EIM will be classified.

PacifiCorp appreciates the efforts taken in updating and modifying the RPS Guidebook and looks forward to working with the Commission and its staff in further refining the RPS program. For the reasons set forth herein and provided in PacifiCorp's February 17, 2015 comments, the Commission should adopt the staff final eighth edition of the RPS Guidebook released on June 1, 2015.

Respectfully submitted,



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