

## **Comment 1 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Amber  
Last Name: Riesenhuber  
Email Address: amber@iepa.com  
Affiliation: IEP

Subject: IEP Comments on Proposed Regulation for a California Renewable Electricity Standard  
Comment:

Attached are IEP's comments on the CARB's Proposed Regulation for a California Renewable Electricity Standard.

Attachment: [www.arb.ca.gov/lists/res2010/1-iep\\_comments\\_re\\_carb\\_proposed\\_regulation\\_for\\_res\\_june\\_2010\\_--\\_final.doc](http://www.arb.ca.gov/lists/res2010/1-iep_comments_re_carb_proposed_regulation_for_res_june_2010_--_final.doc)

Original File Name: IEP Comments RE CARB Proposed Regulation for RES June 2010 -- FINAL.doc

Date and Time Comment Was Submitted: 2010-06-21 15:01:22

No Duplicates.

## **Comment 2 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Shawn

Last Name: Bailey

Email Address: sbailey@semprageneration.com

Affiliation: Sempra Generation

Subject: Proposed Regulation for a California Renewable Energy Standard

Comment:

Sempra Generation appreciates this opportunity to provide comments on CARB's Proposed Regulation for a California Renewable Energy Standard, dated June 2010. Sempra Generation is an owner and developer of renewable and fossil energy resources principally serving markets in the southwest United States.

The Renewable Energy Standard ("RES") regulation at §97011 subsection (a) calls for the Executive Officer, in coordination with the CEC, CPUC and CAISO, to conduct three reviews of the RES program to improve implementation progress. These reviews are to consider, among other things, the feasibility and cost of advances in renewable technology, impacts on electric rates and economic growth, and to propose possible compliance interval adjustments to reduce costs and increase program effectiveness.

The CARB should carefully consider the impact of program changes on new renewable and infrastructure development. Certainty in the program elements and compliance provides developers with the stability necessary to make investments and move renewable projects forward. The potential to change key program elements such as compliance intervals or to account for unproven non-commercial technologies could have a chilling effect on development and be counter-productive to achieving the RES objectives. Sempra Generation recommends that the three program reviews by December 31 of 2013, 2016 and 2018, be replaced by a single review for the purpose of proposing program amendments by December 31, 2016. This balances the need for program stability with the opportunity to alter program elements to achieve specific goals.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-06-23 13:38:37

No Duplicates.

### **Comment 3 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Keith

Last Name: Nakatani

Email Address: knakatani@calhrc.org

Affiliation: California Hydropower Reform Coalition

Subject: Comments on draft 2010 RES

Comment:

The California Hydropower Reform Coalition submits these comments on the proposed 2010 Renewable Electricity Standard. We support ARB's draft RES which has no changes to existing definitions of renewable resources, especially for hydropower. PG&E recommends changing the definition to allow eligibility for out-of-state run-of-river hydro up to 50 MW. Doing so would result in extensive damage to rivers in British Columbia, which is the primary location of out-of-state run-of-river hydro, and would mean a protective hydro standard for California and a lesser standard for out-of-state hydro.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-06-25 14:40:07

No Duplicates.

## **Comment 4 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Lily

Last Name: Mitchell

Email Address: lmittell@hanmor.com

Affiliation: SCPPA

Subject: SCPPA comments on RES regulation

Comment:

Please find attached the comments of the Southern California Public Power Authority on the Proposed Regulation for a California Renewable Electricity Standard.

Attachment: [www.arb.ca.gov/lists/res2010/4-300226001lmm07021001\\_res\\_reg\\_45-day\\_comment.pdf](http://www.arb.ca.gov/lists/res2010/4-300226001lmm07021001_res_reg_45-day_comment.pdf)

Original File Name: 300226001lmm07021001 RES reg 45-day comment.pdf

Date and Time Comment Was Submitted: 2010-07-02 12:45:33

No Duplicates.

## **Comment 5 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: M. Grady  
Last Name: Mathai-Jackson  
Email Address: mgml@pge.com  
Affiliation: Pacific Gas and Electric Company

Subject: PG&E Comments on RES Proposed Regulation  
Comment:

Please find attached the comments of Pacific Gas and Electric Company on ARB's Proposed Regulation for the Renewable Energy Standard.

Attachment: [www.arb.ca.gov/lists/res2010/5-final\\_pg\\_e\\_comments\\_on\\_the\\_formal\\_res\\_proposed\\_regulation\\_\\_00102121\\_.pdf](http://www.arb.ca.gov/lists/res2010/5-final_pg_e_comments_on_the_formal_res_proposed_regulation__00102121_.pdf)

Original File Name: Final PG E Comments on the Formal RES Proposed Regulation (00102121).PDF

Date and Time Comment Was Submitted: 2010-07-02 15:10:46

No Duplicates.

## **Comment 6 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Marc  
Last Name: Ulrich  
Email Address: Marc.Ulrich@sce.com  
Affiliation:

Subject: SCE Comments on RES Proposed Regulation  
Comment:

Attached please find SCE's Comments on the RES Proposed Regulation.

Attachment: [www.arb.ca.gov/lists/res2010/6-southern\\_california\\_edison\\_comments\\_on\\_res\\_proposed\\_regulation.pdf](http://www.arb.ca.gov/lists/res2010/6-southern_california_edison_comments_on_res_proposed_regulation.pdf)

Original File Name: Southern California Edison Comments on RES Proposed Regulation.pdf

Date and Time Comment Was Submitted: 2010-07-02 15:40:33

No Duplicates.

**Comment 7 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Andy

Last Name: Brown

Email Address: abb@eslawfirm.com

Affiliation: Attorney for PacifiCorp

Subject: RES Comments on ARB's Proposed Regulatory Order

Comment:

Please find attached PacifiCorp's Comments on the Renewable Electricity Standard Proposed Regulatory Order for Board consideration and modification. Kind Regards, Deric Wittenborn, Paralegal.

Attachment: [www.arb.ca.gov/lists/res2010/7-100709\\_pacificorp\\_comments\\_on\\_res\\_pro\\_fin.pdf](http://www.arb.ca.gov/lists/res2010/7-100709_pacificorp_comments_on_res_pro_fin.pdf)

Original File Name: 100709\_PacifiCorp Comments on RES PRO\_fin.pdf

Date and Time Comment Was Submitted: 2010-07-09 13:18:42

No Duplicates.

## **Comment 8 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Diana

Last Name: Lee

Email Address: [diana.lee@cpuc.ca.gov](mailto:diana.lee@cpuc.ca.gov)

Affiliation: Division of Ratepayer Advocates

Subject: Division of Ratepayer Advocates Comments on RES

Comment:

Attached on DRA's comments on the RES.

Attachment: [www.arb.ca.gov/lists/res2010/8-dra\\_comments\\_to\\_arb\\_on\\_res.doc](http://www.arb.ca.gov/lists/res2010/8-dra_comments_to_arb_on_res.doc)

Original File Name: DRA\_Comments\_to\_ARB\_on\_RES.DOC

Date and Time Comment Was Submitted: 2010-07-12 10:26:57

No Duplicates.



## **Comment 9 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Timothy

Last Name: Tutt

Email Address: ttutt@smud.org

Affiliation: Sacramento Municipal Utility

Subject: Proposed Regulatory Order for the Renewable Energy Standard

Comment:

Thank you for the opportunity to make comments on the proposed Renewable Energy Standard regulations. The attached file contains comments from the Sacramento Municipal Utility District.

Attachment: [www.arb.ca.gov/lists/res2010/9-smud\\_res\\_comments\\_7-14-2010.pdf](http://www.arb.ca.gov/lists/res2010/9-smud_res_comments_7-14-2010.pdf)

Original File Name: SMUD RES Comments 7-14-2010.pdf

Date and Time Comment Was Submitted: 2010-07-14 12:29:09

No Duplicates.

**Comment 10 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Karen

Last Name: Mills

Email Address: kmills@cbbf.com

Affiliation: California Farm Bureau Federation

Subject: Comments of the California Farm Bureau Federation on Proposed RES

Comment:

In addition on this same date the original and 20 copies of the Comments are being mailed to the Clerk of the Board.

Attachment: [www.arb.ca.gov/lists/res2010/10-comments\\_of\\_cbbf\\_-\\_proposed\\_res.doc.pdf](http://www.arb.ca.gov/lists/res2010/10-comments_of_cbbf_-_proposed_res.doc.pdf)

Original File Name: Comments of CBBF - Proposed RES.doc.pdf

Date and Time Comment Was Submitted: 2010-07-14 14:08:30

No Duplicates.

**Comment 11 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Arthur

Last Name: O'Donnell

Email Address: arthur@resource-solutions.org

Affiliation: Center for Resource Solutions

Subject: CRS Comments on RES Proposed Regulation

Comment:

Please find attached the comments of the Center for Resource Solutions on ARB's Proposed Regulation for the Renewable Energy Standard.

Attachment: [www.arb.ca.gov/lists/res2010/11-crs\\_comment\\_carb\\_res\\_7.16.10.pdf](http://www.arb.ca.gov/lists/res2010/11-crs_comment_carb_res_7.16.10.pdf)

Original File Name: CRS Comment CARB RES 7.16.10.pdf

Date and Time Comment Was Submitted: 2010-07-16 15:23:10

No Duplicates.

**Comment 12 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: harvey  
Last Name: eder  
Email Address: harveyederpspc@yahoo.com  
Affiliation: Public Solar Power Coalition

Subject: Article 11/09 Sci Am/ Ca. 100% Solar by 2020/Wld 2030  
Comment:

Dear CARB Staff RES/BOARD,

See Attached/ article from November 2009 Scientific American on converting the World to Solar Energy by 2030, which includes a reference to a study to convert California to 100% Solar by 2020.

The Sun is the Engine of Our Ecosystem. It makes the Wind Blow, the Water Flow and the Plants Grow. Or it can be used directly. It's the way the World Works.

Rather than 33% RES Solar by 2020, California can and should impliment 100% Solar Conversion by 2020, and Lead the World to Total Solar Conversion by 2030.

Solarly,thanks,take care,  
harvey eder  
Public Solar Power Coalition  
(310)3932589  
harveyederpspc@yahoo.com

Attachment: [www.arb.ca.gov/lists/res2010/12-a\\_path\\_to\\_sustainable\\_energy\\_by\\_2030.docx](http://www.arb.ca.gov/lists/res2010/12-a_path_to_sustainable_energy_by_2030.docx)

Original File Name: A PATH TO SUSTAINABLE ENERGY BY 2030.docx

Date and Time Comment Was Submitted: 2010-07-19 10:41:10

No Duplicates.

**Comment 13 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Bill

Last Name: Powers

Email Address: bpowers@powersengineering.com

Affiliation: Powers Engineering

Subject: comment letter on June 2010 proposed RES staff report

Comment:

Please find attached the July 22, 2010 comments of Powers Engineering on CARB's June 2010 "Proposed Regulation for a California Renewable Electricity Standard - Staff Report: Initial Statement of Reasons."

Attachment: [www.arb.ca.gov/lists/res2010/13-22-july-10\\_powers\\_egr\\_comment\\_ltr\\_carb\\_33\\_\\_res\\_staff\\_report.pdf](http://www.arb.ca.gov/lists/res2010/13-22-july-10_powers_egr_comment_ltr_carb_33__res_staff_report.pdf)

Original File Name: 22-july-10\_Powers Egr\_comment ltr\_CARB 33% RES staff report.pdf

Date and Time Comment Was Submitted: 2010-07-22 19:53:07

No Duplicates.

**Comment 14 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Elizabeth  
Last Name: Hadley  
Email Address: ehadley@reupower.com  
Affiliation: Modesto/Redding/Turlock

Subject: Comments on the RES Proposed Regulation Order  
Comment:

Please find the attached comments on the RES Proposed Regulation Order from the Modesto Irrigation District, Redding Electric Utility, and Turlock Irrigation District.

Attachment: [www.arb.ca.gov/lists/res2010/14-comments\\_to\\_res\\_pro\\_from\\_mid\\_reu\\_tid.pdf](http://www.arb.ca.gov/lists/res2010/14-comments_to_res_pro_from_mid_reu_tid.pdf)

Original File Name: Comments to RES PRO from MID\_REU\_TID.pdf

Date and Time Comment Was Submitted: 2010-07-26 16:49:49

No Duplicates.

**Comment 15 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Susie

Last Name: Berlin

Email Address: sberlin@mccarthyllaw.com

Affiliation: Northern California Power Agency

Subject: Comments on RES

Comment:

NCPA Comments on RES 45-day language

Attachment: [www.arb.ca.gov/lists/res2010/15-comments\\_re\\_6-2-10\\_res\\_proposed\\_regulation\\_\\_final\\_7-30-10\\_.pdf](http://www.arb.ca.gov/lists/res2010/15-comments_re_6-2-10_res_proposed_regulation__final_7-30-10_.pdf)

Original File Name: comments re 6-2-10 RES proposed regulation \_final 7-30-10\_.pdf

Date and Time Comment Was Submitted: 2010-08-03 14:07:03

No Duplicates.

**Comment 16 for California Renewable Electricity Standard (res2010) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.



**Comment 17 for California Renewable Electricity Standard (res2010) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 18 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Ctr of Econ Devel.

Last Name: SCLC

Email Address: Non-web submitted comment

Affiliation: Southern California Leadership Council

Subject: Implementation of California's AB 32 Global Warming Legislation

Comment:

Please see attached comment letter.

Attachment: [www.arb.ca.gov/lists/res2010/19-sclc.pdf](http://www.arb.ca.gov/lists/res2010/19-sclc.pdf)

Original File Name: SCLC.pdf

Date and Time Comment Was Submitted: 2010-09-08 11:29:28

No Duplicates.

**Comment 19 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Martin

Last Name: Hopper

Email Address: [msr.general.manager@gmail.com](mailto:msr.general.manager@gmail.com)

Affiliation: M-S-R Public Power Agency

Subject: RES Proposed Regulation

Comment:

Attached hereto, please find the comments of the M-S-R Public Power Agency regarding the June 2, 2010 Renewable Electricity Standard Proposed Regulation.

Attachment: [www.arb.ca.gov/lists/res2010/20-m-s-r\\_comments\\_re\\_res\\_proposed\\_reg-isor\\_\\_9-8-10\\_-\\_final\\_.pdf](http://www.arb.ca.gov/lists/res2010/20-m-s-r_comments_re_res_proposed_reg-isor__9-8-10_-_final_.pdf)

Original File Name: M-S-R comments re RES proposed reg-ISOR \_9-8-10 - final\_.pdf

Date and Time Comment Was Submitted: 2010-09-08 14:55:19

No Duplicates.

**Comment 20 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Michael

Last Name: Murray

Email Address: mmurray@semprautilities.com

Affiliation: Regional Vice President

Subject: Renewable Electricity Standard

Comment:

Attached are comments from San Diego Gas & Electric Company regarding the Board's proposed regulation for a Renewable Electricity Standard.

Attachment: [www.arb.ca.gov/lists/res2010/21-sdg\\_e\\_cmmts\\_carb\\_res\\_9.10.10.pdf](http://www.arb.ca.gov/lists/res2010/21-sdg_e_cmmts_carb_res_9.10.10.pdf)

Original File Name: SDG&E cmmts CARB RES 9.10.10.pdf

Date and Time Comment Was Submitted: 2010-09-10 13:07:52

No Duplicates.

**Comment 21 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Bruce  
Last Name: McLaughlin  
Email Address: mclaughlin@braunlegal.com  
Affiliation: State Water Contractors

Subject: Comments on the RES NOPA  
Comment:

Please find attached the Comments, Objections, and Recommendations of the State Water Contractors on the Renewable Energy Standard Proposed Regulation.

Attachment: [www.arb.ca.gov/lists/res2010/22-20100921\\_sw\\_c\\_res.pdf](http://www.arb.ca.gov/lists/res2010/22-20100921_sw_c_res.pdf)

Original File Name: 20100921\_SWC\_RES.pdf

Date and Time Comment Was Submitted: 2010-09-20 15:06:21

No Duplicates.

## **Comment 22 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Koji  
Last Name: Kawamura  
Email Address: kawamura@wapa.gov  
Affiliation:

Subject: Comments by Western Area Power Admin  
Comment:

These comments are in response to the California Air Resources Board (CARB) Notice of Public Hearing to Consider Adoption of Proposed Regulations for a California Renewable Electricity Standard - set for hearing on September 23, 2010.

Western Area Power Administration (Western), a federal agency, appreciates the CARB's acknowledgement of Western's previous comments; however, as previously stated, Western continues to express concerns that the CARB's regulations include Western as a regulated entity. Western refers the CARB to Western's previous comments and Western will not restate those comments here.

Rather than continuing to identify Western as a regulated entity, the CARB should create a new definition in Section 97002 titled "Cooperating Agency". The CARB could then define Cooperating Agency to include Western. Western notes there are numerous places where the proposed regulations specifically identify Western and the Department of Water Resources for different treatment than other Regulated Parties. In the proposed regulations, CARB often treats Western and DWR in the same fashion. As a result, rather than identifying Western and DWR as a "Regulated Party" in the regulations, Western encourages the CARB to create a new definition for Western and DWR. For instance: (1) CARB could remove the references to Western and DWR from Section 97006 (a)-(d) and change 97006(f) to "Reporting by Cooperating Agencies -- Beginning July 1, 2013, and July 1st of each year thereafter, Cooperating Agencies shall voluntarily submit the following information for the prior calendar year to ARB:"; (2) Remove the references to Western and DWR from Section 97004(a) and change 97004(d) by deleting DWR and Western and substituting Cooperating Agency. Along these same lines, Western also would recommend creating a new subsection (c) in 97009 that states "No part of this section 97009 shall apply to a Cooperating Agency."

If you have any questions with regard to the above, please feel free to contact me at (720) 962-7017 or kawamura@wapa.gov.

Koji Kawamura

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-09-21 09:15:34

No Duplicates.

**Comment 23 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Clare  
Last Name: Breidenich  
Email Address: clare@wptf.org  
Affiliation: Western Power Trading Forum

Subject: Comments on Proposed Renewable Energy Standard Regulation  
Comment:

Please confirm receipt.  
Thank you, Clare Breidenich

Attachment: [www.arb.ca.gov/lists/res2010/24-9-22-10\\_wptf\\_comments\\_to\\_arb\\_on\\_the\\_res\\_proposed\\_regulation-1.pdf](http://www.arb.ca.gov/lists/res2010/24-9-22-10_wptf_comments_to_arb_on_the_res_proposed_regulation-1.pdf)

Original File Name: 9-22-10 WPTF Comments to ARB on the RES proposed regulation-1.pdf

Date and Time Comment Was Submitted: 2010-09-22 10:32:05

No Duplicates.



**Comment 24 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Geoff

Last Name: Bromaghim

Email Address: gbromaghim@ttcorp.com

Affiliation: Renewable Energy Markets Association

Subject: REMA Comments on Proposed RES Regulation

Comment:

Please find attached the comments of the Renewable Energy Markets Association on ARB's Proposed Regulation for the Renewable Energy Standard.

Attachment: [www.arb.ca.gov/lists/res2010/25-rema\\_comments\\_to\\_the\\_carb\\_\\_9.22.2010.pdf](http://www.arb.ca.gov/lists/res2010/25-rema_comments_to_the_carb__9.22.2010.pdf)

Original File Name: REMA comments to the CARB, 9.22.2010.pdf

Date and Time Comment Was Submitted: 2010-09-22 11:14:53

No Duplicates.

**Comment 25 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Nancy

Last Name: Rader

Email Address: nrader@calwea.org

Affiliation: California Wind Energy Association

Subject: CalWEA Comments on Proposed RES Regulation

Comment:

Please see attached letter regarding the proposed regulation on the Renewable Electricity Standard.

Attachment: [www.arb.ca.gov/lists/res2010/26-calwea\\_comments\\_on\\_proposed\\_res\\_regulation\\_9-22-10.pdf](http://www.arb.ca.gov/lists/res2010/26-calwea_comments_on_proposed_res_regulation_9-22-10.pdf)

Original File Name: CalWEA Comments on Proposed RES Regulation 9-22-10.pdf

Date and Time Comment Was Submitted: 2010-09-22 11:03:38

No Duplicates.

**Comment 26 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Laura

Last Name: Wisland

Email Address: [lwisland@ucsusa.org](mailto:lwisland@ucsusa.org)

Affiliation: Union of Concerned Scientists

Subject: UCS Comments on Proposed 33% RES Regulation

Comment:

Please accept the attached comments from the Union of Concerned Scientists regarding the proposed adoption of a 33% Renewable Electricity Standard.

Attachment: [www.arb.ca.gov/lists/res2010/27-ucs\\_comments\\_on\\_res\\_09\\_22\\_10\\_1.pdf](http://www.arb.ca.gov/lists/res2010/27-ucs_comments_on_res_09_22_10_1.pdf)

Original File Name: UCS comments on RES 09\_22\_10\_1.pdf

Date and Time Comment Was Submitted: 2010-09-22 11:41:50

No Duplicates.

**Comment 27 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Ian  
Last Name: McGowan  
Email Address: imcgowan@3degreesinc.com  
Affiliation:

Subject: 3Degrees' comments on the PRO for ARB's RES  
Comment:

Hello,

3Degrees appreciates the opportunity to submit the attached comments. Please let me know if you have any questions.

Thank you,  
Ian

Attachment: [www.arb.ca.gov/lists/res2010/28-3degrees\\_comments\\_on\\_6.2\\_res\\_pro\\_9.22.10.pdf](http://www.arb.ca.gov/lists/res2010/28-3degrees_comments_on_6.2_res_pro_9.22.10.pdf)

Original File Name: 3Degrees Comments on 6.2 RES PRO\_9.22.10.pdf

Date and Time Comment Was Submitted: 2010-09-22 11:48:48

No Duplicates.

**Comment 28 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Bernadette  
Last Name: Del Chiaro  
Email Address: bernadette@environmentcalifornia.org  
Affiliation: Environment California

Subject: Proposed RES regulations  
Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/res2010/29-res\\_comments.pdf](http://www.arb.ca.gov/lists/res2010/29-res_comments.pdf)

Original File Name: res comments.pdf

Date and Time Comment Was Submitted: 2010-09-22 11:53:32

No Duplicates.

**Comment 29 for California Renewable Electricity Standard (res2010) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 30 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: Darrell  
Last Name: Steinberg  
Email Address: Kip.Lipper@SEN.CA.GOV  
Affiliation:

Subject: California Legislature  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/res2010/31-comment.pdf](http://www.arb.ca.gov/lists/res2010/31-comment.pdf)

Original File Name: comment.pdf

Date and Time Comment Was Submitted: 2010-09-23 16:08:15

No Duplicates.

## **Comment 31 for California Renewable Electricity Standard (res2010) - 45 Day.**

First Name: James  
Last Name: Hendry  
Email Address: jhendry@sfgwater.org  
Affiliation:

Subject: CCSF  
Comment:

From: Hendry, James  
Sent: Wednesday, September 22, 2010 11:44 AM  
To: 'Collord, Gary@ARB'  
Cc: Broome, Bart; Ramirez, Manuel  
Subject: CCSF Comment on RES language -- Suggested change

Gary - Sorry for the late notice, but in reviewing the ISOR, we are concerned that the RES standard could hold the City and County of San Francisco (CCSF) to a RES greater than the 33% that all other utilities are responsible for, and could do so even prior to 2020.

The proposed language is inconsistent with both SB722 and AB32.

The 67% language contained in SB722 was designed to be self-enforcing. As long as CCSF was greater than 67% hydro, then the remaining energy needs would be met by RPS resources. Should CCSF fall below the 67% threshold, then CCSF would be subject to the same requirements as any other utility

Under the proposed regulations as explained in the ISOR, however, CCSF could face a RES obligation that "could be less than, or in excess of, the RES percentages in Table 1" (ISOR p. VIII-7). For example, if in 2012, there was a significant outage of CCSF's hydro generation and it fell to only 60% of our requirements, CCSF would be obligated to meet a 40% RES requirement in 2012, while all other utilities (all of which have significantly higher GHG-emissions) are only subject to a 20% RES requirement.

This does not comport with either the intent of SB722 or the requirements of AB32. As noted above, the intent of SB722 was that it would be a self-enforcing alternative that would not apply if CCSF otherwise met the requirements of the RPS (now REC) standard.



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Under the proposed regulations, CCSF, with a GHG emission level much lower than other utilities would be held to a much higher standard than any other utility in the state. We think you agree that this is a problem.

The attached language fixes this problem.

Please feel free to contact me at (415) 867-9596 or Bart Broome at (415) 554-0706 if you have any questions

Attachment: [www.arb.ca.gov/lists/res2010/41-hendry.pdf](http://www.arb.ca.gov/lists/res2010/41-hendry.pdf)

Original File Name: Hendry.pdf

Date and Time Comment Was Submitted: 2010-10-26 09:24:44

No Duplicates.

**Comment 1 for California Renewable Electricity Standard (res2010). (At Hearing)**

First Name: Sara  
Last Name: Kamins  
Email Address: tbo@cpuc.ca.gov  
Affiliation:

Subject: Public Utilities Commission  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/res2010/32-sara.pdf](http://www.arb.ca.gov/lists/res2010/32-sara.pdf)

Original File Name: Sara.pdf

Date and Time Comment Was Submitted: 2010-09-28 14:35:45

No Duplicates.

**Comment 2 for California Renewable Electricity Standard (res2010). (At Hearing)**

First Name: Danielle

Last Name: Osborn Mills

Email Address: Non-web submitted comment

Affiliation:

Subject: CEERT

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/res2010/34-danielle.pdf](http://www.arb.ca.gov/lists/res2010/34-danielle.pdf)

Original File Name: Danielle.pdf

Date and Time Comment Was Submitted: 2010-09-28 14:35:45

No Duplicates.

**Comment 3 for California Renewable Electricity Standard (res2010). (At Hearing)**

First Name: Tedi

Last Name: Curee

Email Address: Non-web submitted comment

Affiliation:

Subject: 40% RPS Compliance Target

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/res2010/35-tedi.pdf](http://www.arb.ca.gov/lists/res2010/35-tedi.pdf)

Original File Name: Tedi.pdf

Date and Time Comment Was Submitted: 2010-09-28 14:35:45

No Duplicates.

**Comment 4 for California Renewable Electricity Standard (res2010). (At Hearing)**

First Name: Rahmon

Last Name: Momoh

Email Address: Non-web submitted comment

Affiliation:

Subject: CA Public Utilities Commission

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/res2010/36-rahmon.pdf](http://www.arb.ca.gov/lists/res2010/36-rahmon.pdf)

Original File Name: Rahmon.pdf

Date and Time Comment Was Submitted: 2010-09-28 14:35:45

No Duplicates.

**Comment 5 for California Renewable Electricity Standard (res2010). (At Hearing)**

First Name: Mark

Last Name: Krausse

Email Address: Non-web submitted comment

Affiliation:

Subject: PG&E

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/res2010/37-mark.pdf](http://www.arb.ca.gov/lists/res2010/37-mark.pdf)

Original File Name: MArk.pdf

Date and Time Comment Was Submitted: 2010-09-28 14:35:45

No Duplicates.

**Comment 6 for California Renewable Electricity Standard (res2010). (At Hearing)**

First Name: Matthew

Last Name: Freedman

Email Address: Non-web submitted comment

Affiliation:

Subject: TURN

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/res2010/38-matthew.pdf](http://www.arb.ca.gov/lists/res2010/38-matthew.pdf)

Original File Name: Matthew.pdf

Date and Time Comment Was Submitted: 2010-09-28 14:35:45

No Duplicates.

**Comment 7 for California Renewable Electricity Standard (res2010). (At Hearing)**

First Name: Elizabeth

Last Name: Klebaner

Email Address: bheeley@adamsbroadwell.com

Affiliation:

Subject: Adams Broadwell Joseph & Cardozo

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/res2010/39-elizabeth.pdf](http://www.arb.ca.gov/lists/res2010/39-elizabeth.pdf)

Original File Name: Elizabeth.pdf

Date and Time Comment Was Submitted: 2010-09-28 14:35:45

No Duplicates.