



## California Wind Energy Association

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March 25, 2019

The Honorable Ben Hueso  
Chair, Senate Committee on Energy, Utilities and Communications  
State Capitol Room 4305  
Sacramento, CA 95814

**RE: SB 386 (Caballero) – OPPOSE**

Dear Chairman Hueso:

On behalf of the California Wind Energy Association (CalWEA), a 19-year-old trade association representing wind energy and related companies focused on the California market, primarily including owners and operators of wind energy projects located in California, I write in opposition to Senate Bill 386.

SB 386 would erode the effectiveness of the California Renewables Portfolio Standard (RPS) program by enabling large, existing hydroelectric facilities to be credited towards RPS compliance obligations if they are owned by one or more irrigation districts. This exception, itself unwarranted, would establish a precedent that could be sought by other load serving entities owning large hydroelectric resources. As hydro supplies as much as 15 percent of total retail sells, depending on annual precipitation levels, such exceptions could lead to a significant reduction in the amount of renewable energy purchased by load-serving entities, representing a concomitant setback for achieving California's greenhouse-gas-reduction goals.

In addition, SB 386 would grant an unfair advantage to one set of retail providers. The Legislature has already acted twice to relax RPS program requirements for any local publicly owned electric utility if the combination of its large hydroelectric generation and its RPS compliance target exceeds its total retail sales. Those changes were reasonable. The changes proposed in SB 386, including enabling irrigation districts to sell excess power generated by large hydroelectric resources as RPS-eligible energy to other retail sellers and local publicly owned electric utilities, are wholly unjustified and would undermine the effectiveness of the RPS program.

Finally, we note that large hydropower is eligible to count towards the 100% zero-energy goal established under SB 100, adopted last year.

March 25, 2019  
Page 2

Sincerely,

A handwritten signature in cursive script that reads "Nancy Rader".

Nancy Rader  
Executive Director

cc: Members and Staff, Senate Energy, Utilities and Communications Committee  
Senator Anna Caballero

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