

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue
Implementation and Administration, and Consider
Further Development of, California Renewables
Portfolio Standard Program.

Rulemaking 15-02-020
(Filed February 26, 2015)

**COMMENTS OF THE
CALIFORNIA WIND ENERGY ASSOCIATION
ON PROPOSED DECISION ACCEPTING
2015 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLANS**

December 7, 2015

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**COMMENTS OF THE
CALIFORNIA WIND ENERGY ASSOCIATION
ON DRAFT 2015 RPS PROCUREMENT PLANS AND
RELATED QUESTIONS IN ASSIGNED COMMISSIONER’S RULING**

I. INTRODUCTION AND SUMMARY

Pursuant to the California Public Utilities Commission’s (“Commission”) Rule of Practice and Procedure 14.3, the California Wind Energy Association (“CalWEA”) respectfully submits these comments on the November 16, 2015, *Proposed Decision of Administrative Law Judge Mason Accepting Draft 2015 Renewables Portfolio Standard Procurement Plans* (“PD”).

As explained further below, CalWEA generally supports the PD – in particular, its proposed actions relating to: denying Southern California Edison’s (“SCE”) proposal to require sellers to execute an exclusivity agreement with shortlisted projects; requiring the investor-owned utilities (“IOUs”) to enable the use of shared transformers and low-side metering; and ensuring that there is no double counting of costs between the Integration Cost Adder in the Least-Cost, Best-Fit (“LCBF”) methodology and other Net Market Value (“NMV”) components. However, as discussed below, CalWEA recommends that the Commission revise the PD to articulate the latter two decisions in the ordering paragraphs, and to authorize the IOUs to offer amendments to existing PPAs to allow the utilization of shared transformers and low-side metering.

II. ARGUMENTS

A. **The PD’s Requirement Enabling the Use of Shared Transformers and Low-Side Metering is Reasonable, and Should Be Extended to Authorize Corresponding Amendments to Existing PPAs**

CalWEA applauds the PD for recognizing that the utilities’ past practices of prohibiting projects from utilizing shared transformers or prohibiting low-side metering are not justified, and therefore unjustifiably raise costs and increase environmental impacts. The PD appropriately points to the California Independent System Operator (“CAISO”) tariff, which permits these practices with the CAISO’s prior approval of metering arrangements.

To encourage the correction of past practices that may hinder repowering efforts, we urge the Commission to modify the PD to expressly authorize the IOUs to offer amendments to existing PPAs, including PPAs executed under the RAM program, to allow the projects subject to those PPAs to utilize shared transformers and low-side metering.¹

B. **The Commission Should Articulate its Findings in the Ordering Paragraphs of this Decision**

We note that the PD’s ordering paragraphs do not reflect the PD’s findings on two issues: that the IOUs should include a description of how their process ensures that there is no double counting between the Integration Cost Adder and the NMV components in the LCBF methodology section of the RPS plan; and that the IOUs should permit shared facilities and low-side metering. With regard to the latter, as discussed above, we request that the Commission also expressly authorize modification of existing PPAs to enable shared transformers. We therefore request that two additional ordering paragraphs be included in the final decision as follows:

“PG&E, SCE and SDG&E shall include a description of how their process ensures that there is no double counting between the IC adder and NMV components in the LCBF methodology section of the RPS plans.”

and

¹ Commission precedent supports this approach. In Resolution E-4655, the Commission authorized SCE to offer amendments to its RAM 3 and RAM 4 PPAs to conform the guaranteed resource adequacy provisions in those PPAs to the newly adopted guaranteed resource adequacy provisions, with the amendments to be approved via Tier 2 advice letter. Resolution E-4655 at 17-19.

“PG&E, SCE and SDG&E shall revise their pro forma terms and conditions to expressly permit projects with shared facilities, including shared transformers, and projects using low-side metering. These utilities may, in addition, offer amendments to existing PPAs, including PPAs executed under the RAM program, to allow the projects subject to those PPAs to utilize shared transformers and low-side metering, and may file Tier 2 advice letters seeking approval of such amendments.”

III. CONCLUSION

For the foregoing reasons, the Commission should adopt the recommendations set forth in these comments.

Respectfully submitted,

/s/ Nancy Rader

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VERIFICATION

I, Nancy Rader, am the Executive Director of the California Wind Energy Association. I am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing copy of *Comments of the California Wind Energy Association on Proposed Decision Accepting Draft 2015 RPS Procurement Plans* are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 7, 2015, at Berkeley, California.

/s/ Nancy Rader

Nancy Rader
Executive Director, California Wind Energy Association