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VIA E-MAIL (docket@energy.state.ca.us) AND U.S. MAIL

John L. Geesman
Commissioner and Presiding Member
Renewables Committee
California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Jackalyne Pfannenstiel
Vice Chair and Associate Member
Renewables Committee
California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Re: **RPS Eligibility Guidebook revisions**
Docket No. 03-RPS-1078
Docket No. 02-RPS-1038

Dear Commissioners,

PacifiCorp Corporation provides the following comments to the Proposed Changes to the Renewables Portfolio Standard Eligibility Guidebook (RPS Guidebook) and Procurement Verification Report (Verification Report). PacifiCorp provides these comments from the perspective of one of two multi-jurisdictional utilities whose RPS obligations have been uniquely prescribed by Assembly Bill 200 (Leslie, Chapter 50, Statutes of 2005). The intent of AB 200 (now codified at Public Utilities Code ("PUC") section 399.17) is to provide PacifiCorp with flexibility to meet its California RPS obligations from renewable resources pooled across six states of its service territory because it does not procure specific resources for its northern California customers. (Senate Rules Committee, Floor Analysis Report at p. 3.) The CEC Staff seems to have recognized this purpose by proposing several important changes, particularly exemptions from out-of-state eligibility and delivery requirements, to make the guidelines compatible with the new law and the design of PacifiCorp's electrical system. Accordingly, PacifiCorp supports the proposed changes and submits the following minor suggestions to maintain consistency of purpose throughout the RPS Guidebook and Verification Report.

RPS Guidebook

Page 21, insert, following the last complete sentence on the page: *Generation procured by them from out-of-state- facilities need not meet the "Delivery requirements" set forth below.*

Page 31, in line one of the chapeau paragraph under Supplemental Instructions: Insert *"both"* between the words "for" and "RPS". This change clarifies that the additional information is required of facilities seeking certification for both SEPs and RPS.

Page 39, in line two of last paragraph on page, insert "or telemeter" after "NERC tag". This is because some out-of-state facilities may provide unit contingent energy directly into a utility's control area without pre-scheduling.

Appendix A, CEC-RPS-Track, Retail Sellers Attestation Form, at the end of the paragraph add: *The requirements of the two foregoing sentences do not apply to retail sellers subject to AB 200.*

Appendix A, CEC-RPS-GEN, Generators Attestation Form, at the end of item 5 add: *(Not applicable to out-of-state facilities procured by retail sellers subject to AB 200)*

Appendix A, CEC-RPS-1, Question 27 following the No answer: *(Except facility generation procured by retail sellers subject to AB 200)*

Verification Report

Page 24, second paragraph, second sentence: Replace the phrase "must remain" with *"are currently"*. PacifiCorp believes that this change is more consistent with CPUC Decision 05-11-025.

PacifiCorp appreciates the opportunity to make these brief comments and thanks Commission Staff for their consideration.

Very truly yours,

John A. McKinsey

cc: Bob Lively
Jeremy Weinstein, Esq.