CRS center for resource solutions

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02-REN-1038	
DATE	SEP 09 2010
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September 9, 2010

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 03-RPS-1078
and
Docket No. 02-REN-1038
RPS Proceeding
1516 Ninth Street
Sacramento, CA 95814-5512

To Whom It May Concern,

Center for Resource Solutions, which administers the Green-e certification programs for renewable energy and carbon offsets, appreciates the ability to provide comments to the California Energy Commission on the matter of potential changes to the California RPS guidebooks. We have provided comments below on Attachment B.

Please do not hesitate to contact us if CEC staff has any questions or comments about the feedback provided.

Best regards,

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Attachment B: Questions Concerning Possible Changes to the Renewables Portfolio Standard Eligibility Guidebook

1. Multi-Fuel Facilities and the De Minimis Quantity of Nonrenewable Fuels

The Green-e Energy National Standard recently completed a revision in which co-firing calculations and a similar de minimis threshold was discussed, and ultimately rejected. We received stakeholder feedback advocating that the de minimis threshold be dropped, because a) if a facility can measure that it is below the threshold, it can just as easily deduct the MWh attributable to the non-renewable fuel(s), and b) for a biomass generation facility of 20MW, for example, 2% of annual output would be over 3,500 MWh easily identifiable as coming from fossil fuels, but allowed to be called renewable.

CRS recommends that the CEC also do away with a de minimis threshold when it comes to co-firing renewable and non-renewable energy sources. We further recommend that similar language be struck from "6. Renewable Facilities Using Multiple Fuels" at the end of "Attachment B" and where applicable in "RENEWABLES PORTFOLIO STANDARD ELIGIBILITY Draft Staff Guidebook Fourth Edition".

2. Retroactive Renewable Energy Credits in WREGIS

CRS is interested in the ongoing development of this issue and would be happy to contribute to the discussion. We are supportive of retro REC creation only if safeguards are put in place to prevent issuance of retro RECs from causing double counting. We are interested in collaborating on the development of such safeguards if the retro REC issue moves forward, as we have a great interest in preventing double counting of renewable generation.

4. Municipal Solid Waste as an Eligible Biomass Feedstock

In the criterion requiring that "[t]he facility processes solid waste from which, as much as possible, all recyclable materials and marketable green waste compostable materials have been removed before the solid waste conversion process", it would be beneficial to include more specific language on recycling and composting than "as much as possible". The Green-e Energy program's MSW requirements are extremely close to the CEC's and we have received numerous questions about the practical application of these recycling and composting requirements. Users of the Guidebook likely have similar questions, and clarification of this language would benefit both programs' participants.

Regarding question b, in thinking through the matter of calculating electricity derived from any organic materials remaining after compostables are removed, we have found that in practice this calculation would be quite difficult and perhaps not very reliable. We do not have a formal recommendation for the CEC on this other than caution. We have not yet made our own determination of whether or how to work with such electricity from organic materials, but believe that treatment of electricity from such organic matter as renewable could be problematic if not handled very delicately.