



CALIFORNIA ENERGY COMMISSION

STAFF WORKSHOP

PROPOSED REVISIONS TO THE RPS ELIGIBILITY GUIDEBOOK AND THE OVERALL PROGRAM GUIDEBOOK

Mark Kootstra
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Renewable Energy Office

Hearing Room A
10 AM PST, August 30, 2010

*Thank you for your participation – the workshop will begin shortly.
Please take advantage of the WebEx call-back function.*



Workshop Agenda

- Welcome & Housekeeping
- Staff Presentation
 - New Legislation
 - Overview of proposed guidebook revisions
- Public comments and questions on proposed guidebook revisions
- BREAK
- Staff presentation on outstanding issues being considered
- Public comments and questions on outstanding issues
- Next Steps



Housekeeping

- Handouts on desk at room entrance
- Restrooms located on 1st floor
- Snack bar on 2nd floor
- Several restaurants within walking distance
- Emergency evacuation procedures
- WebEx
 - For interactive participation use WebEx



WebEx Participation

- WebEx users can:
 - View slides
 - “Raise hand” to ask a question
 - “Chat” to the WebEx host
- WebEx users are muted on entry
- WebEx users will be un-muted during Q&A
- Login details are on page 4 of the Workshop Notice



Ground Rules

- Use blue cards to make speaking request
 - Blue cards available on table at room entrance
 - Submit blue cards to Energy Commission staff
 - Before speaking, provide business card to court reporter
 - Must use microphone at podium to speak
- WebEx and phone-only participants can also ask questions during Q&A



Public Comments & Questions

- We plan to take comments and questions in the following order:
 - Audience in Attendance
 - Blue cards
 - WebEx participants
 - Click the “Raise Hand” button to ask a question
 - We can then un-mute your phone line to take your question verbally
 - Alternatively, you can “chat” your question to WebEx “Host”
 - Phone-only participants
 - We will un-mute all phone lines for open ‘mic’ questions
 - Please only un-mute your phone to ask a question



Staff Workshop on RPS Eligibility for 20% by 2010

- The draft revisions to these guidebooks are proposed by staff with approval of the Renewables Committee
 - Commissioners Boyd and Weisenmiller
- Pending legislation (SB 722, Simitian) does not affect the guidebooks at this time.
- The CPUC's Proposed Decision Modifying its Decision on Tradable RECs for the RPS does not affect the guidebooks at this time.
- The ARB's Renewable Electric Standard draft regulations would apply to 33% by 2020 RPS.



New Legislation Affecting RPS

- **Assembly Bill 3048 (2008)**
 - Addresses the RPS-eligibility of existing renewable generation owned by or under contract with a local publicly-owned electric utility (POU)
- **Senate Bill 380 (2008)**
 - Expands feed-in tariffs for small renewable generators (up to 1.5 MW) in the service territories of the large IOUs
 - Raises the program cap from 250 MW to 500 MW
- **Assembly Bill 1351 (2009)**
 - Requires that hydroelectric facilities must be owned by a retail seller or publicly owned electric utility for their incremental generation due to eligible efficiency improvements to count as eligible for the RPS
 - Expands RPS eligibility of incremental hydroelectric generation to facilities located outside California

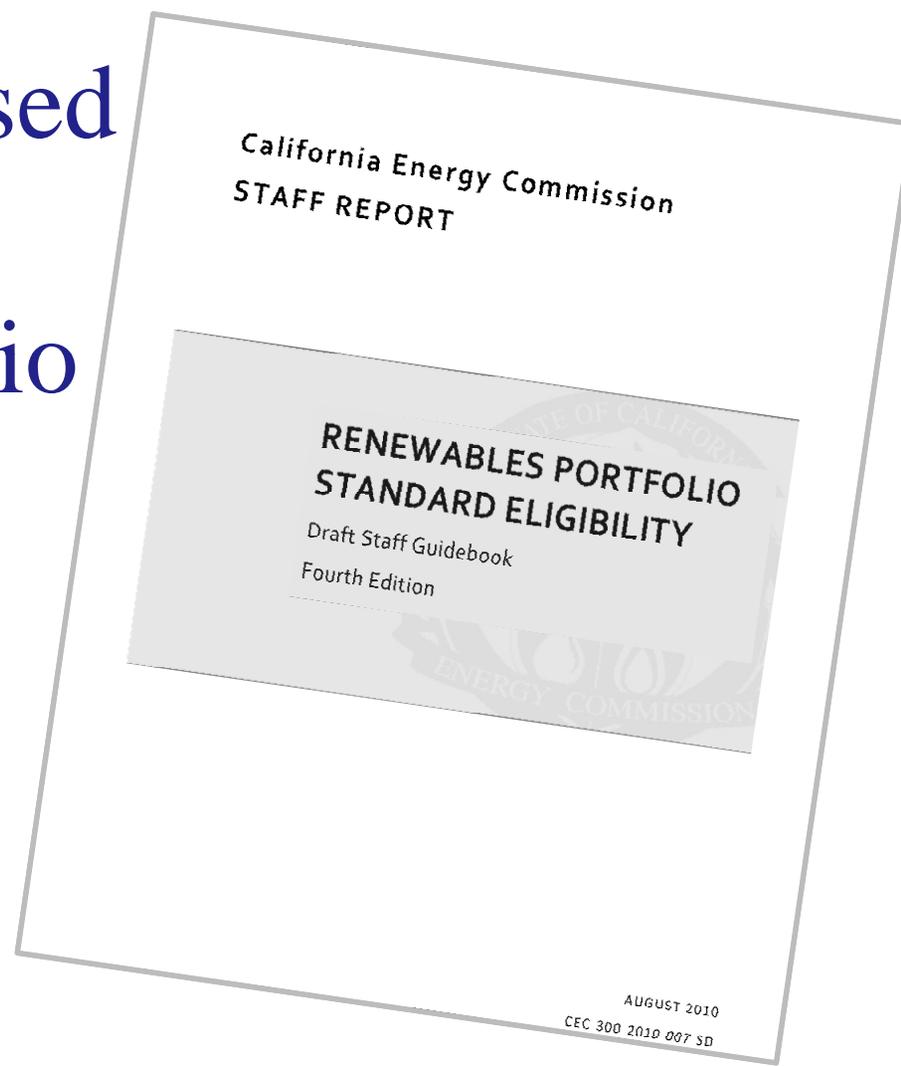


New Legislation – cont'd

- Assembly Bill 920 (2009)
 - Requires electric utilities to develop a standard contract or tariff for eligible wind and solar distributed energy generators that provides for surplus net metering
 - The utility may count this surplus generation toward its RPS obligation
- Senate Bill 32 (2009)
 - Expands the eligible project size of the feed-in tariff from 1.5 MW to 3 MW in size
 - Raises the program cap from 500 MW to 750 MW
 - Requires POUs to comply with this statute
 - Must be implemented through a CPUC proceeding before projects can utilize the new tariff



Overview of Proposed Revisions to the Renewables Portfolio Standard Eligibility Guidebook





Proposed Revisions to RPS Eligibility and the Certification Process

Mark Kootstra

Energy Analyst, RPS Unit

Renewable Energy Office



RPS Eligibility and Overall Program Guidebook: *Proposed Revisions are Primarily in these Categories*

- Biodiesel
- Biogas
- Biomass
- Fuel Cells
- Hydroelectric
- Municipal Solid Waste
- Multi-Fuel
- Publicly Owned Utilities
- Out-of-State
- Application Process
- Certification Process
- Verification Process
- WREGIS & Interim Tracking System
- Glossary of Terms
- Appeals process



RPS Eligibility Guidebook: *Proposed Revisions*

- **Biodiesel**

- Adds requirement that facility operator and fuel production supplier must provide attestations that fuel meets RPS eligibility requirements.

- **Biogas**

- Clarifies that biogas may be used to generate electricity at the fuel processing site or transported to an RPS-eligible electric generating facility.
- Provides acceptable methods of transporting biogas from fuel processing site to electric generating facility.
- Expands the eligibility of biogas to include electric generating facilities located outside California (but within the WECC).
- Clarifies the documentation required to demonstrate that requirements for delivery are satisfied.



RPS Eligibility Guidebook: *Proposed Revisions*

- **Biomass**

- Clarifies the de minimis nonrenewable fuel requirements for biomass facilities.
 - 5% nonrenewable fuel if facility participates in the Existing Renewable Facilities Program; 2% if only participates in RPS.
- Adds requirement that facility operator must provide attestation that fuel meets RPS eligibility requirements.

- **Fuel Cells**

- Clarifies eligibility requirements for fuel cells using renewable fuels in electrochemical reaction to generate electricity.
 - Landfill gas, digester gas, or other RPS-eligible gases
 - Hydrogen or hydrogen-rich gases derived from a non-fossil fuel or feedstock through the use of power generated by an RPS-eligible resource.



RPS Eligibility Guidebook: *Proposed Revisions*

- **Hydroelectric**

- Incorporates changes in law addressing eligibility of small hydroelectric and incremental hydroelectric facilities as follows:
 - Implements Assembly Bill 3048, allowing RPS eligibility for existing small hydroelectric facilities owned or under contract with local POUs before January 2006.
 - Implements Assembly Bill 1351, allowing incremental hydroelectric generation from out-of-state facilities to receive Section 401 certification under the federal Clean Water Act from the applicable state board or agency, and requires incremental generation from hydroelectric facilities to be owned by a retail seller or a POU.



RPS Eligibility Guidebook: *Proposed Revisions*

• **Municipal Solid Waste Conversion**

- Expands eligibility and clarifies requirements for MSW conversion facilities.
 - Allows facilities located outside of California to be RPS eligible by submitting operating permits from the local governing body responsible for permitting solid waste facilities in that region.
 - California Integrated Waste Management Board is now the California Department of Resources Recycling and Recovery (CalRecycle).
 - CalRecycle adopted regulations that were previously pending under CIWMB in earlier guidebooks.
 - Permit now required from CalRecycle or other “Enforcement Agency.”



RPS Eligibility Guidebook: *Proposed Revisions*

- **Out-of-State Facilities**
 - Requires submission of environmental documentation to support the analysis submitted on Laws, Ordinances, Regulations and Standards (LORS) requirements.
 - Adds “Noise” to the list of categories to be analyzed under LORS requirements.



RPS Eligibility Guidebook: *Proposed Revisions*

- **Multiple Fuel Facilities – Measurement Methods**
 - Requires all facilities using multiple energy inputs to select and submit an appropriate measurement method, or submit an alternative, that will be used to measure the contribution of each resource.
 - Provides appropriate measurement methods for three categories of renewable technologies:
 - Combustion and fuel cell technologies
 - Non-combustion thermal technologies
 - Non-thermal electric generating technologies (excluding fuel cells)



RPS Eligibility Guidebook: *Proposed Revisions*

- **Certification Process**
 - Allows existing small hydroelectric and out-of-state baseline facilities owned or under contract to a POU to be RPS eligible.
 - Describes the process for receiving a biogas delivery approval letter from Energy Commission staff.
 - Adds limitations on the eligibility of past generation from eligible facilities not yet certified for the RPS.
 - Pre-2008 generation not yet RPS-certified may count if certification application submitted by January 1, 2011.
 - Clarifies requirements for registration in WREGIS, and places limits on the use of the Interim Tracking System.



RPS Eligibility Guidebook: *Proposed Revisions*

- **Application Process**

- The CEC-RPS-2 form will no longer be accepted as a valid application form for RPS certification or pre-certification.
 - Retail sellers or publicly owned electric utilities may still certify facilities, but they must do so as a facility's agent on a CEC-RPS-1A form.
- Certification forms must now be submitted electronically, via email, in addition to the signed original submitted by regular mail.



Proposed Revisions for RPS Tracking, Reporting, and Verification Using



Kate Zocchetti

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Renewable Energy Office



RPS Eligibility Guidebook: *Proposed Revisions*

- Tracking & Verification for 2008, 2009 & 2010
 - 2008 Compliance Year: *Interim Tracking & WREGIS*
 - Interim Tracking System extended for 2008 generation and procurement if not tracked in WREGIS–Use RPS-Track and Gen Forms
 - Use CEC-RPS-Delivery Form to report NERC-E tag data
 - 2009 and 2010 Compliance Years: *All WREGIS Most of the Time*
 - Interim Tracking System allowed only if WREGIS data are unavailable under these situations and with CEC staff approval:
 - For test energy until WREGIS tracks generation that occurs before commercial online date (C.O.D.)
 - For delivery verification – beginning in 2009 and in subsequent years, retail sellers must use WREGIS to document delivery from out of state facilities unless that service was not used or available (for 2009 and 2010 only).



RPS Eligibility Guidebook: *Proposed Revisions*

- Tracking & Verification for 2011 and Subsequent Years: ***All WREGIS All the Time***
 - WREGIS only must be used to verify procurement and delivery, except as follows and with CEC staff approval:
 - For test energy until WREGIS tracks generation that occurs before C.O.D.
 - For delivery verification from out of state resources until WREGIS can verify delivery for retail sellers who use third party importers



RPS Eligibility Guidebook: *Proposed Revisions*

- Reporting and Due Dates for Retail Sellers
 - 2008 Compliance Year: Reports due December 1, 2010
 - For procurement tracked in WREGIS (i.e. retired RECs), retail sellers must use WREGIS State/Provincial/Voluntary Compliance Report
 - For procurement NOT tracked in WREGIS, retail sellers use RPS-Track Form to report monthly and annual procurement per facility
 - For generation NOT tracked in WREGIS, generators (unless utility-owned) use RPS-Gen Form to report monthly and annual generation data
 - 2009 Compliance Year: Reports due March 1, 2011
 - WREGIS must be used for procurement reports (except for test energy)
 - WREGIS must be used to verify delivery (unless that service was not used or available)



RPS Eligibility Guidebook: *Proposed Revisions*

- Reporting and Due Dates for Retail Sellers
 - 2010 Compliance Year and Subsequent Years
 - Reports due June 1, 2011, and June 1 every subsequent year for procurement/retirement in the previous year
 - WREGIS must be used for procurement and delivery verification
 - 2010 - WREGIS must be used for delivery unless that service was not used or available
 - 2011 and subsequent years - Exceptions allowed only with CEC staff approval
- Reporting and Due Dates for POUs
 - Reports due June 1 for the previous year
 - New consolidated reporting format beginning with 2008 compliance year: CEC-REO-POU Form
 - Allows POUs to report for RPS, Power Source Disclosure, and Electricity Analysis Office (AB 380, 2005 IEPR)



RPS Eligibility Guidebook: *Summary of Reporting Using the Interim Tracking System and WREGIS*

Year	Generation and Procurement Tracking and Reporting	Out-of-State Delivery Information
2008	WREGIS and/or Interim Tracking System	Interim Tracking System
2009 and 2010	WREGIS Only ¹	WREGIS and/or Interim Tracking System
2011 and subsequent years	WREGIS Only	WREGIS ²

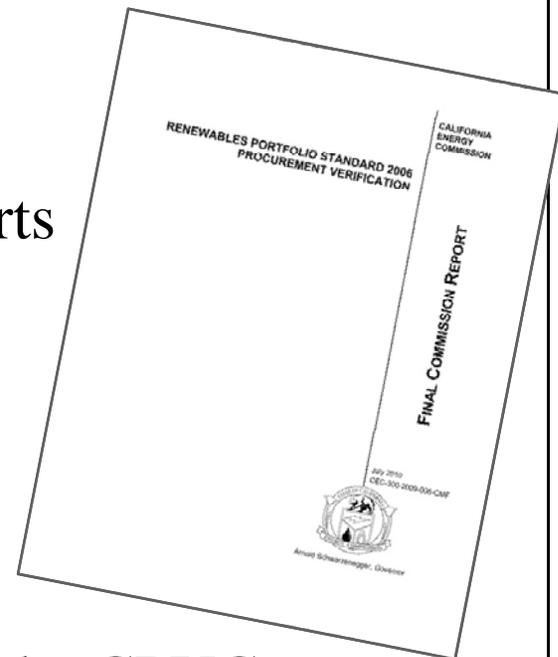
¹ The Energy Commission will accept test energy procurement reported using the Interim Tracking System until WREGIS tracks test energy, as determined by Energy Commission staff.

² In cases where third parties provide scheduling services for delivery into California on behalf of the retail seller, the retail sellers' ability to report using WREGIS may not be available. Until this issue is resolved, staff will accept delivery information using the Interim Tracking System.



RPS Eligibility Guidebook: *RPS Verification Report*

- RPS Procurement Verification Report for Retail Sellers
 - CEC analyzes WREGIS compliance reports to determine:
 - RPS eligibility of RPS claims
 - Procurement does not exceed generation per facility
 - There is not double-counting
 - CEC submits final Verification Report to the CPUC
 - Retail sellers must submit “Verified Compliance Report” to CPUC within 30 Days
 - CPUC applies flexible compliance rules to determine compliance with RPS





RPS Eligibility Guidebook: *Initial Steps for Using WREGIS for California's RPS*

1. Create one CA RPS retirement subaccount for each compliance year.
2. Complete and submit a form authorizing WREGIS to release your company's RPS compliance information to the Energy Commission. The WREGIS authorization form can be downloaded from the WREGIS website: www.wregis.org
3. Coordinate with generators to ensure that all appropriate California RPS-eligible WREGIS Certificates are transferred to your WREGIS account for each compliance year.
4. If you are retiring WREGIS Certificates for out-of-state generation, you must demonstrate to the Energy Commission that energy was delivered to California using NERC E-tags.*

*** Delivery requirements do not apply to multi-jurisdictional facilities that fall under the provisions of Public Utilities Code Section 399.17.**



RPS Eligibility Guidebook: *Initial Steps for Reporting NERC E-Tag Information Using WREGIS*



- Retail sellers must apply with the WREGIS Administrator to begin using delivery service, which imports E-tag data from North American Electric Reliability Corporation (NERC) using Open Access Technology International. Sign up for WREGIS E-Tag delivery service as soon as it is known that it will be needed.
- To apply send an email to the WREGIS Administrator to: wregisadmin@wecc.biz requesting to be added to the delivery service participant list.
- Retail sellers must also provide the WREGIS administrator a list of their Purchasing Selling Entity (PSE) codes.



RPS Eligibility Guidebook

Appendix A: WREGIS Instructions



- Create designated “CA RPS” retirement subaccounts
- Retire WREGIS Certificates into retirement subaccounts
- Import NERC E-tags into your account – ***Beginning in 2009 for users who must demonstrate energy delivery into California from out of state facilities***
- How to file a State/Provincial/Voluntary Compliance Report to demonstrate monthly procurement claims per facility per year



RPS Eligibility Guidebook *Appendix B: RPS Forms*

Interim Tracking System

- CEC-RPS-Track
- CEC-RPS-GEN
- CEC-RPS-Delivery **NEW!**
- CEC-REO-POU **NEW!**

WREGIS

- WREGIS
State/Provincial/Voluntary
Compliance Report Attestation
Form **NEW!**

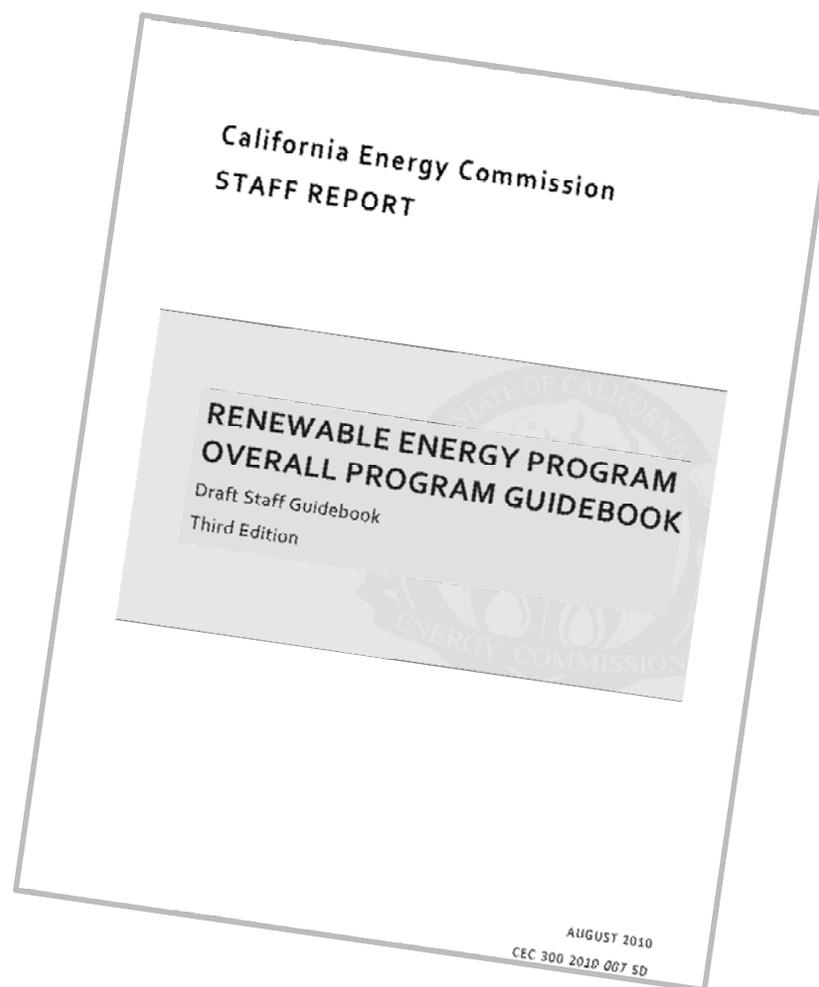
Certification

- Instructions/Notes for Completing the CEC-RPS-1A/B Application Forms
- CEC-RPS-1A, Application for RPS Certification
- Certification Supplement Forms for Biopower, Hydroelectric and Out-of-State Facilities
- CEC-RPS-1B, Application for RPS Pre-Certification
- Pre-Certification Supplement Forms for Biopower, Hydroelectric and Out-of-State Facilities



Overview of Proposed Revisions to the Overall Program Guidebook for the Renewable Energy Program

Mark Kootstra





Overall Program Guidebook: *Proposed Revisions*

- Removes reference to the New Renewable Facilities Account.
 - Under SB 1036, the New Renewable Resources Account was terminated in 2008 and funds were transferred to retail sellers for Above-Market Funds.
- The Commission Appeals section under the Disputes of Funding Award Payments has been removed.
 - The appropriate process for challenging the Executive Director's determination is the Arbitration process.



Overall Program Guidebook: *Proposed Revisions*

The following terms have been revised or added in the Glossary of Terms:

- Biogas
- Biomass
- Central Station
- Commercial Operation
- Distributed Generation
- Hydroelectric
- Local Publicly Owned Electric Utility
- Nonrenewable Energy Resource
- On-site Generation
- PTC (PVUSA Test Conditions)
- Renewable Energy Certificate
- Self-generation
- WECC Interconnection
- Western Renewable Energy Generation Information System (WREGIS)



Overall Program Guidebook: *Proposed Revisions*

- *Changes to the Biopower definitions:*
 - *Biogas* — clarified to include digester gas, landfill gas, and any gas derived from an eligible biomass feedstock.
 - *Biomass* — any organic material not derived from fossil fuels, including, but not limited to, ...



Overall Program Guidebook: *Proposed Revisions*

- ***Central Station and Distributed Generation***

- Central station facilities primarily serve the needs of a large number of offsite customers.
- Distributed generation facilities primarily offset all or some of the customer's onsite load.
- On-site generation and self-generation now reference the definition for Distributed Generation.

NEW!

- ***Commercial Operation***

- The date when a generation facility ceases to generate electricity for testing purposes and first generates electricity solely for the purpose of consumption by the facility or any customer or for sale to any procuring retail seller.



Overall Program Guidebook: *Proposed Revisions*

- ***Hydroelectric*** — a technology that produces electricity by using the kinetic energy of flowing or falling water to turn a turbine generator, referred to as hydro. See also “small hydro.”
- ***Nonrenewable energy resource*** — refers to any energy resource that does not meet the definition of a “Renewable” resource described below.
- ***PTC*** — PVUSA Test Conditions, developed to test and compare PV systems as part of the PVUSA (Photovoltaics for Utility Scale Applications) project.

NEW!



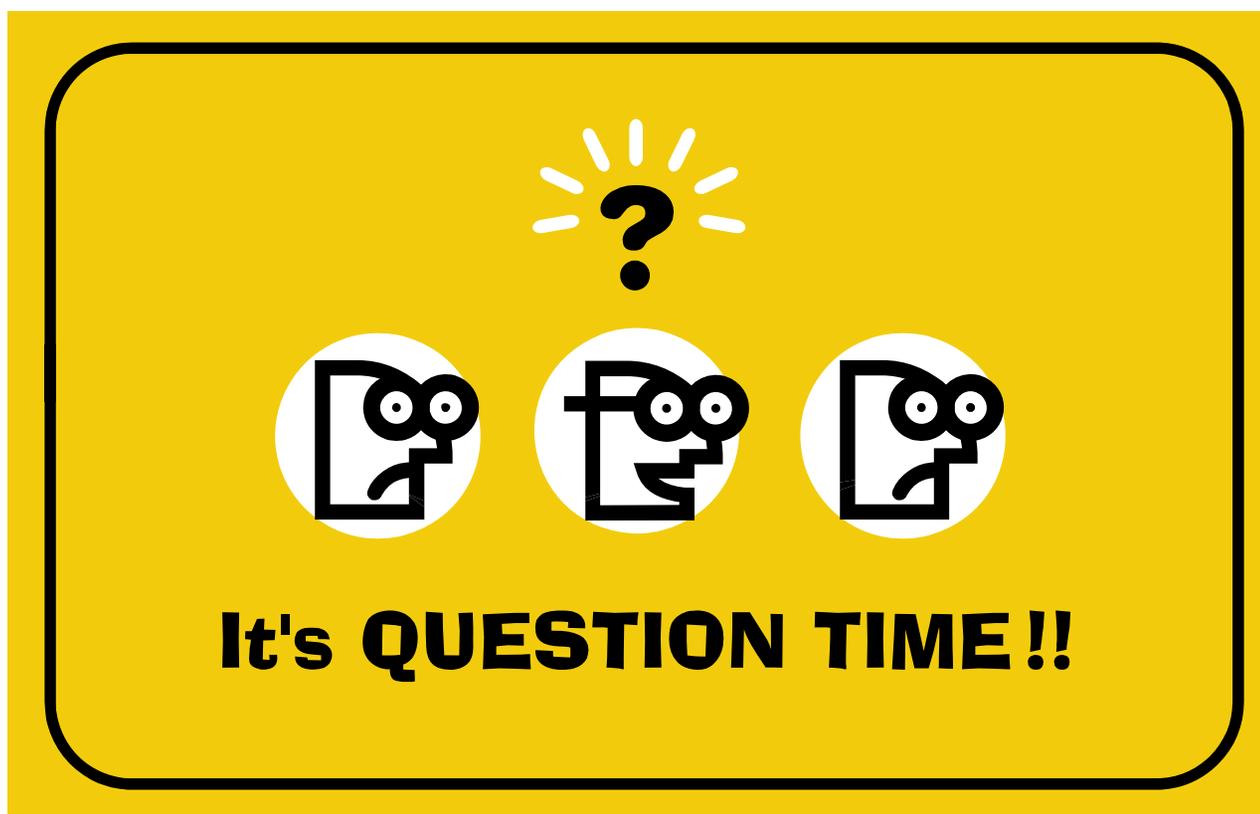
Overall Program Guidebook: *Proposed Revisions*

NEW!

- ***Renewable Energy Certificate*** — adds reference to the CPUC's 2008 decision defining a REC
- ***WECC interconnection*** — the substation where radial lines from a given power plant first interconnect to the WECC transmission system
- ***Western Renewable Energy Generation Information System (WREGIS)*** — the electronic system for tracking Renewable Energy Certificates (RECs) for the states and provinces in the WECC interconnection.



Questions and Comments about Proposed Guidebook Revisions?





Break



Overview of Outstanding Issues under Consideration for the Renewables Portfolio Standard Eligibility Guidebook



RPS Eligibility Guidebook: *Outstanding Issues*

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

Public Utilities Code 399.12(e)(3) states:

“No electricity generated by an eligible renewable energy resource attributable to the use of nonrenewable fuels, beyond a de minimis quantity, as determined by the Energy Commission, shall result in the creation of a renewable energy credit.”

- The Energy Commission set the de minimis quantity at 2% nonrenewable fuel for new facilities for 100% of the generation to count for RPS. Nonrenewable fuel is measured on an annual total energy input basis.
- If the nonrenewable fuel input exceeds 2% on an annual basis, then no nonrenewable fuel can contribute to the generation of RECs that are eligible for California’s RPS.



Existing Multi-Fuel Facilities and the use of Nonrenewable Fuels for RPS

- WREGIS creates “fossil-fuel” RECs eligible for California RPS for nonrenewable generation from:
 - An existing renewable facility using up to 25% nonrenewable fuels that came online and was certified and operational as a renewable qualifying small power production facility (QF) under federal Public Utility Regulatory Policies Act (PURPA) before 2002, and currently certified as a renewable QF may count 100% of its generation for RPS.
 - An existing renewable facility that was in a retail seller’s baseline from the 2002-2003 Interim RPS Solicitation may use up to 25% nonrenewable fuels and count 100% toward RPS.
 - A 5% de minimis quantity of nonrenewable fuel input applies to facilities that participate in the Existing Renewable Facilities Program.



RPS Eligibility Guidebook: *Outstanding Issues*

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

- **Should the Energy Commission reconsider its approach for new facilities? If so...**
 - **What uses of nonrenewable fuels should be counted as contributing to the electric generation?**
 - **What amount of nonrenewable fuel used at a facility should constitute a “de minimis amount” and be eligible as renewable in California’s RPS?**
 - **Should different de minimis values be awarded to an individual facility or a grouping of facilities? If so, please suggest reasonable criteria and describe any parameters that should be used to make this determination.**



RPS Eligibility Guidebook: *Outstanding Issues*

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

- **Should a measurement methodology based on plant operations or efficiencies be allowed rather than actual energy input?**
- **Should the measurement methodology consider the input time of the nonrenewable fuel?**
- **For facilities that exceed the de minimis, but use less than 25% nonrenewable fuels, should an amount equal to the de minimis percentage be credited towards the facilities' RPS eligible generation?**



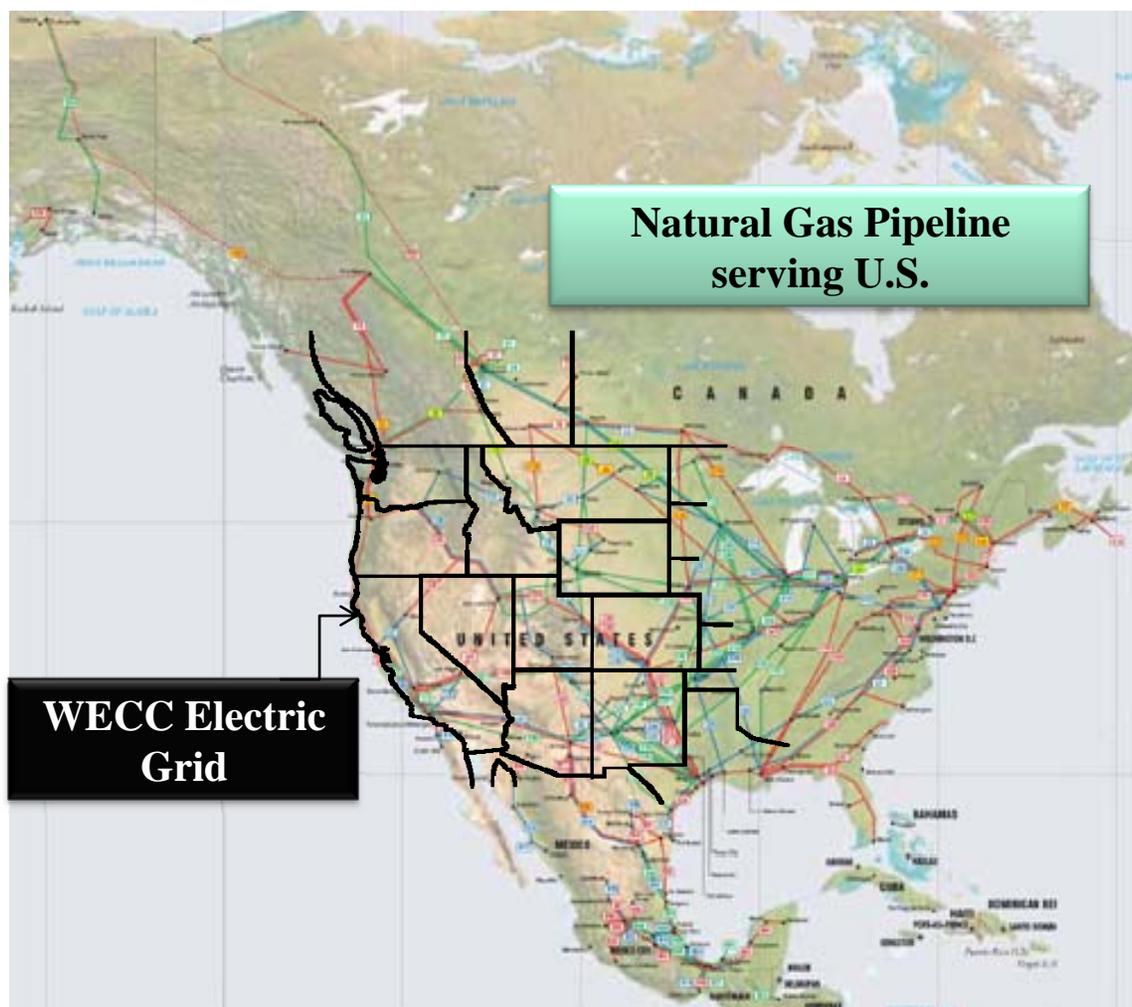
RPS Eligibility Guidebook: *Outstanding Issues*

Biogas Delivery via Injection into Natural Gas Pipeline

- RPS-eligible biogas may be injected into a natural gas transportation pipeline system and delivered into California (or as proposed, delivered to the electric generation facility if the electric generation facility is located outside of California).
- Eligible biogas fuel delivered via the natural gas pipeline system to a RPS eligible facility must be contractually delivered under contracts with the necessary pipeline operators. This is the only physical restriction placed on biogas sources that produce an RPS eligible fuel.



Biogas Delivery via Injection into Natural Gas Pipeline



- Should the Energy Commission consider further restricting the location of eligible biogas production facilities to participate in California's RPS?
- If so, please suggest reasonable and verifiable parameters.
- If other restrictions should be considered, what should those restrictions be?



RPS Eligibility Guidebook: *Outstanding Issues*

- **Biogas Delivery via Injection into the Natural Gas Pipeline System & Storage**

- The RPS Guidebook does not exclude the use of biogas storage facilities or other storage agreements along a delivery path.

- **Should the use of storage facilities be disallowed in the delivery of biogas to an RPS-eligible biogas electricity generating facility? If yes, why and under what conditions?**

- **Should the use of natural gas storage facilities to store biogas in a natural gas pipeline system be treated differently than the transportation of biogas through a natural gas pipeline system? If yes, please explain.**



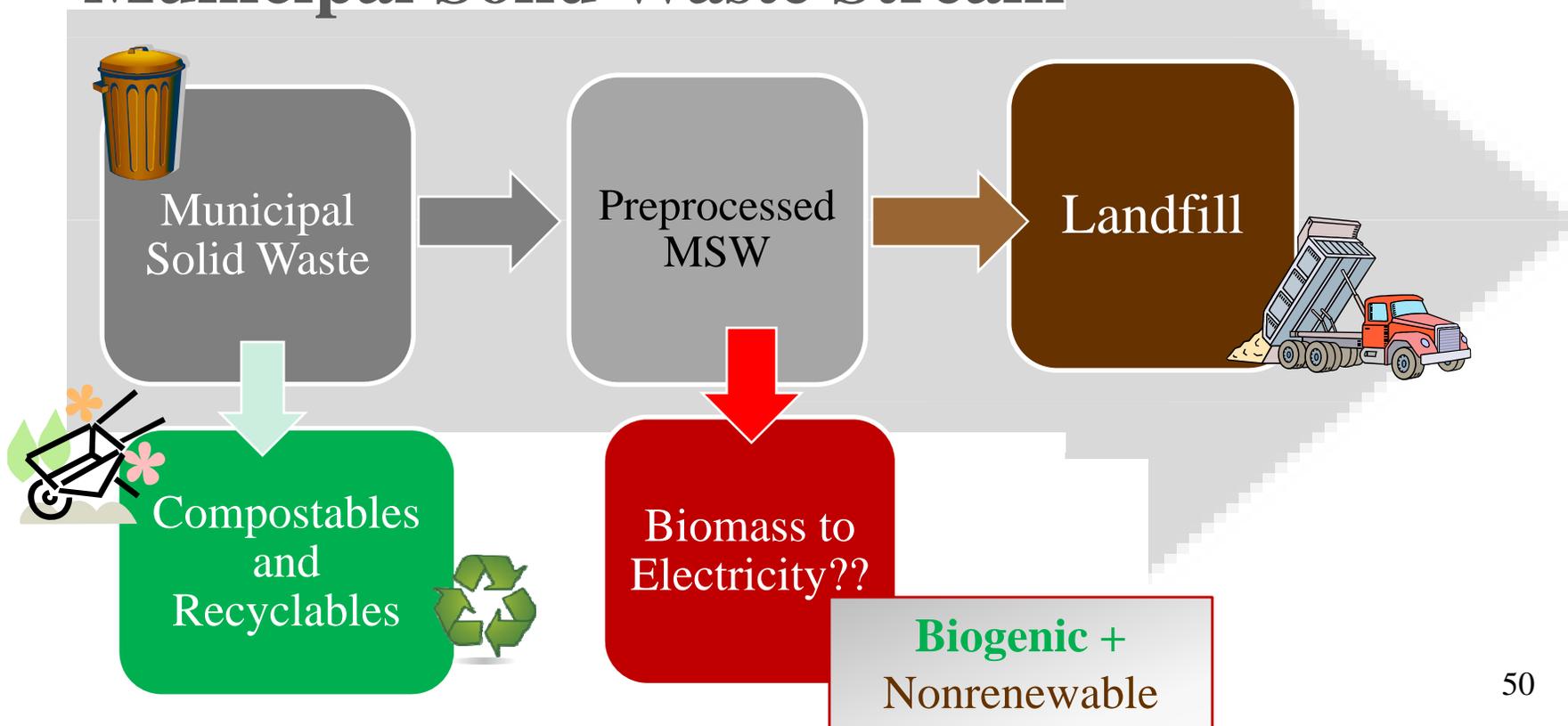
RPS Eligibility Guidebook: *Outstanding Issues*

- **Municipal Solid Waste as an Eligible Biomass Feedstock**
 - The RPS program currently classifies any material extracted from a comingled waste stream as MSW despite processing that may have been performed on the material.
 - Because MSW contains a mixture of organic and inorganic and fossil-fuel based materials, the Energy Commission does not consider MSW as an eligible biomass feedstock.
 - **If MSW is pre-processed and handled such that CalRecycle makes a determination that it is no longer solid waste, should the Energy Commission reconsider MSW as an eligible biomass fuel for the RPS?**



If MSW is handled and processed into a different or new product for a purpose other than for a landfill, as determined by CalRecycle, then it is no longer regulated by CalRecycle as “solid waste.”

Municipal Solid Waste Stream





RPS Eligibility Guidebook: *Outstanding Issues*

- **Municipal Solid Waste as an Eligible Biomass Feedstock**
 - After MSW has been processed there is the possibility of contamination of the biogenic portion with other material derived from fossil fuels or other nonrenewable sources.
 - **Is the remaining contamination insignificant enough such that 100% of the material could be considered renewable for purposes of the RPS?**
 - **If not, what is a reasonable amount of remaining material from fossil fuel that could render 100% of the material as an eligible biomass feedstock?**
 - **Is the fossil fuel fraction remaining after processing measurable? If so, how?**



RPS Eligibility Guidebook: *Outstanding Issues*

- **Retroactive Renewable Energy Credits in WREGIS**
 - **Test Energy**
 - Using the Interim Tracking System, the Energy Commission accepts procurement of all generation, so long as the facility becomes RPS certified according to the RPS Eligibility Guidebook requirements.
 - WREGIS will only create RECs for energy generated during the month of “Commercial Online Date” and going forward. WREGIS is working to change the process so that test energy is captured in WREGIS RECs.
 - Until WREGIS creates RECs for test energy, the Energy Commission will continue to allow test energy using the Interim Tracking System.
 - **Beyond Test Energy**
 - Some parties are exploring the pros and cons of allowing WREGIS to create RECs for generation from facilities that are online but not previously registered with WREGIS (“Retroactive RECs”).



RPS Eligibility Guidebook: *Outstanding Issues*

• **Retroactive Renewable Energy Credits in WREGIS**



- **If WREGIS changes its process and functionality, should the Energy Commission allow generation from facilities already online but not previously registered in count retroactive RECs for generation prior to the 75-day reporting period for RPS?**
 - **If no, should retroactive RECs be limited to test energy? Why or why not?**
- **Should there be a time limit for generation prior to the upload date, and if so, what should the limit be for RPS (up to the two years that WREGIS allows for Prior Period Adjustments)?**



Questions and Comments about Outstanding Issues Being Considered?





Next Steps

- Public comments are due by 5 pm on Sept. 10, 2010
- Follow filing instructions in Workshop Notice
- Staff will revise these draft guidebooks to incorporate public comments, as appropriate, with direction from the Renewables Committee
- Final Draft guidebooks planned for adoption at Energy Commission's November 17, 2010 Business Meeting
- Guidebooks become effective immediately upon adoption



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