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02-REN-1038
DOCKET
11-RPS-01
DATE 11-1-11
RECD. 11-3-11

November 1st, 2011

California Energy Commission
Dockets Office, MS-4
Re: Docket Nos. 11-RPS-01; 02-REN-1038
RPS Proceeding
1516 Ninth Street
Sacramento, CA 95814

RE: Changes Proposed to the Renewable Portfolio Standard Eligibility Guidebook

SolarReserve appreciates this opportunity to comment on the California Energy Commission workshop on the proposed changes to the RPS Eligibility Guidebook.

In Section B, "Outstanding Issues," on page 10 of the document, new text reads, "The only energy storage technologies currently eligible for the RPS are pumped-storage hydroelectric and fuel cells using renewable fuel..." We believe that molten salt energy storage should be included in this section.

On December 15th, 2010, the CEC itself approved an Application for Certification (AFC) for the Rice Solar Energy Project (RSEP), which utilizes SolarReserve's concentrating solar power (CSP) technology with molten salt energy storage.

In the hearing granting the AFC in December 2010, Commissioner Eggert opined that "So, I guess my one comment is it would be excellent if we could have some renewables projects that were this straight forward."[1] In the same transcript, Commissioner Weisenmiller says, "And so, again, it was a very easy project to get to yes, and the fact that it has storage. It's really, I think in a lot of respects, moving us to where we wanted to go."[2] There can be little doubt that this CSP facility is RPS eligible or that it uses energy storage. We suggest that Section B of the revised Guidebook be corrected to reflect this fact.

Respectfully submitted,

Tom Georgis
Senior Vice President
SolarReserve

[1] http://www.energy.ca.gov/business_meetings/2010_transcripts/2010-12-15_Transcript.pdf. See p. 195, line 23.
[2] *Ibid.*, see p. 215, line 2.

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