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California Energy Commission
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California Energy Commission
Dockets Office, MS-4
Docket No. 13-RPS-01
RPS Proceeding
1516 Ninth Street
Sacramento, CA 95814-5512

**COMMENTS OF THE CITY OF AZUSA
ON THE CALIFORNIA ENERGY COMMISSION'S PROPOSED 15-DAY LANGUAGE
REGARDING REGULATIONS ESTABLISHING ENFORCEMENT PROCEDURES
FOR THE RENEWABLES PORTFOLIO STANDARD
FOR LOCAL PUBLICLY OWNED ELECTRIC UTILITIES**

I. INTRODUCTION

The City of Azusa Light & Water ("Azusa") is a publicly owned utility that has been serving the electricity and water needs of City of Azusa residents for over 100 years. Azusa is governed by a five member Utility Board - a local regulatory authority comprising of individuals appointed by the Azusa City Council. Azusa is a member of the Southern California Public Power Authority (SCPPA) and California Municipal Utilities Association (CMUA).

Azusa would like to thank the CEC Commissioners and staff for their diligent work on the proposed RPS Regulations and for providing stakeholders another opportunity to comment. Azusa supports the comments submitted concurrently by SCPPA and the CMUA.

II. COMMENTS

At this time, Azusa wishes to emphasize its continuing concern regarding the treatment of pre-June 1, 2010 Grandfathered Renewable Resources.

We urge the CEC to view the **"count in full"** provision of the RPS statute from an objective, rational, and fair perspective. We strongly believe that the appropriate interpretation of the "count in full" provision is that, if desired, grandfathered and RPS - compliant contracts can be considered with <u>ALL</u> their attributes (hence "full"), to include their potential inclusion into a specific Portfolio Content Category. The proposed

interpretation of "count in full" is harmful to entities such as Azusa whose pre-June1, 2010 contracts qualify for Portfolio Content Category 1.

III. CONCLUSION

Azusa would like to again thank CEC staff for the time and efforts spent in developing the proposed RPS Regulations and accompanying documentation. Azusa looks forward to working collaboratively with the CEC on these important matters.

Respectfully Submitted,

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