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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue  
Implementation and Administration, and  
Consider Further Development of, California  
Renewables Portfolio Standard Program

Rulemaking 15-02-020  
(Filed February 26, 2015)

**RESPONSE OF THE LARGE-SCALE SOLAR ASSOCIATION ON THE JOINT  
PARTIES MOTION TO AMEND THE RPS PLANS RULING**

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June 15, 2016

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Pursuant the Commission’s Rules of Practice and Procedure, the Large-Scale Solar Association (“LSA”) respectfully submits the following response to the *Motion Of The California Biomass Energy Alliance, California Wind Energy Association, Calpine Corporation, Geothermal Energy Association And Ormat Nevada, Inc., To Amend Assigned Commissioner And Assigned Administrative Law Judge’s Ruling Identifying Issues And Schedule Of Review For 2016 Renewables Portfolio Standard Procurement Plans* (“Joint Parties Motion”).

The Joint Parties Motion raises questions related to the management and use of curtailment provisions, allocation of risk and costs of potential oversupply, similar to those raised by LSA in its June 7th motion. LSA supports the examination of these issues in this proceeding as it relates to RPS compliance, procurement evaluation and risk allocation. LSA recommends the Commission act on the Joint Parties Motion by taking the following steps:

- 1) Grant LSA’s motion to amend the RPS Plans Ruling so that the specific questions related to these issues as recommended by LSA are addressed in addition to the Joint Parties more general questions. LSA expects that the answers to these questions will provide some of the necessary information to allow all parties to better understand these issues

and facilitate further productive discussion about how best the Commission can support RPS compliance while we transition to a low-carbon, high renewables grid.

- 2) In light of those responses, the Commission should assess the range of solutions under development and in progress by the CAISO and the Commission as part of efforts to modernize the grid. This should include looking at how the participation of all resources and the traditional market structures enable or block the ability of the grid to efficiently utilize high levels of renewables – ensuring that the entire pool of resources is considered when assessing issues of potential oversupply. It should also include evaluation of the Joint Parties recommendation to shift the risk for CAISO directed curtailment to the utilities. This recommendation is of great interest to LSA, however, we find more information is necessary in order to assess its potential value.
  
- 3) In response to the Joint Parties request for information on how curtailment costs are being addressed in procurement decisions, LSA understands the interest of other renewable technologies in understanding how the potential costs of oversupply are being considered in procurement and recommends the Commission include this topic as part of least-cost, best-fit (“LCBF”) reform. Given the multiple parallel changes to the grid that are underway, including those looking at harnessing oversupply as a benefit like electrification and matinee pricing, LSA is concerned with the prospect of yet another complex and lengthy modeling exercise. Given this, LSA recommends the Commission approve the Joint Parties request for further information on how the utilities are accounting for curtailment in LCBF with particular a focus on how the current congestion adders work, whether these adders are a good proxy for curtailment costs more generally and if not, why not.

Finally, LSA supports the utilization of the paid economic curtailment rights under existing contracts and agrees with the Joint Parties that the utilization of these rights are an important tool to mitigate potential reliability-related curtailment. This is true not only for RPS contracts but for the overall pool of resources, most notably imports, where improvement in the economic bidding and scheduling of these resources has the potential to significantly reduce curtailment of renewables.

### **Conclusion**

LSA respectfully requests the Commission act on the Joint Parties Motion as recommended above.

Dated: June 15, 2016

Respectfully Submitted,

/s/ Rachel Gold  
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## VERIFICATION

I, Rachel Gold, am the Policy Director of the Large-scale Solar Association. I am authorized to make this Verification on its behalf. I declare that the statements in the foregoing copy of the *Response Of The Large-Scale Solar Association To the Joint Parties Motion to Amend The 2016 RPS Plans Ruling* are true of my own knowledge, except as to the matters, which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 15, 2016 at Berkeley, California.

/s/ Rachel Gold

Rachel Gold  
Policy Director  
Large-scale Solar Association