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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)

**REPLY COMMENTS OF THE LARGE-SCALE SOLAR ASSOCIATION ON
THE DRAFT 2016 RPS PLANS**

Rachel Gold
Policy Director
Large-scale Solar Association
2501 Portola Way
Sacramento, California 95818
rachel@largescalesolar.org
(510) 629-1024

September 16, 2016

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Pursuant the Commission’s Rules of Practice and Procedure, the Assigned Commissioner and the May 17th Assigned Administrative Law Judge’s Ruling Identifying Issues and Schedule of Review For 2016 Renewables Portfolio Standard Procurement Plans Ruling (the “Ruling”) and the June 13th Motion Granting the investor owned utilities’ (“IOU”) extension request, the Large-Scale Solar Association (“LSA”) respectfully submits the following reply comments on the Draft 2016 RPS Plans.

1. California’s Policy Goals Required Continued Ongoing RPS Procurement

LSA strongly supports the Independent Energy Producers (“IEP”) comments on the Draft RPS Plans.¹ IEP’s comments are aligned with LSA’s opening comments that recommend continued and clear procurement opportunities as necessary to support a robust renewables market and achieve California’s aggressive climate goals. Now that the California’s 2030 climate targets have been signed into law, the Commission is in a key position to act expeditiously and aggressively to ensure these requirements are met. For the electricity sector, that means not only further reductions of greenhouse gas emissions overall but building on the success to date by

¹ Comments of IEP on Draft RPS Procurement Plans (Sep. 1, 2016), p 2.

preparing to shoulder increased load due to electrification of vehicles and buildings. According to the Pathways analysis, achieving emissions reductions needed to reach 40% below 1990 levels by 2030 will likely require 60% renewables by 2030. This is not an RPS target that is somewhat fungible via the use of banking but a projected need that 60% of generation provided by renewables annually by 2030.²

IEP's opening comments provides important analysis that highlights why continued procurement, above the minimum RPS requirements, is necessary not only to achieve climate goals but due to the savings that will otherwise be lost should the utilities not take advantage of the extension of federal tax credits.³ LSA concurs with IEP that RPS solicitations can and should be held in 2017 so that the long-term benefit of these provisions accrue to California ratepayers. In addition, LSA agrees that 2017-2018 solicitation could allow Pacific Gas and Electric ("PG&E") to take advantage of the federal tax credit extensions and opportunities to bring renewables online with those extensions in time to replace Diablo Canyon.⁴ For example, a mid-2017 RPS solicitation could have advice letters filed as early as late 2017/early 2018 and possible Commission approval before the end of 2018. This timing would allow solar projects to commence construction in 2019, enabling those projects to qualify for the 30% Investment Tax Credit and be online by 2024, before Unit 1 of Diablo Canyon retires.

LSA also observed in reviewing the plans of the other retail sellers, as others did, that little to no information about future procurement was provided in their Draft RPS Plans. LSA supports the Joint Utilities recommendation that all retail sellers provide complete information in

² Slide Presentation, E3, California Pathways GHG Scenario Results (Apr, 6, 2015), Slides 27, *available at*: https://ethree.com/documents/E3_PATHWAYS_GHG_Scenarios_Updated_April2015.pdf

³ IEP Comments, p 5.

⁴ *Id.* p 10.

the RPS Plans.⁵ In addition to the items described by the Joint Utilities (cost quantification, solicitation documentation, etc.) this should include specific information about upcoming solicitation schedules and expected needs. This information will assist parties and the Commission in determining how best to support ongoing renewable procurement, a continued robust renewables market, a clear course for achieving what will be required by SB 32 and opportunities to capture ratepayers savings from federal tax credits.

2. Least-Cost, Best-Fit Reform Should Continue But Not Delay Solicitations.

LSA appreciates the Joint Parties interest in Least-Cost, Best-Fit Reform (LCBF) and was pleased to see the information provided by Southern California Edison (“SCE”) revealed that SCE is accounting for solar penetration impacts and additional curtailment.⁶ LSA strongly supports additional explanation and information from the utilities on how the LCBF methodologies account for (but do not double count) the capabilities and likely costs of different resources. Based on the information shared to date, it is not clear to LSA why these elements are insufficient to address the Joint Parties needs or whether the additional elements suggested by the Joint Parties are appropriate for inclusion in LCBF. LSA looks forward to further discussion of these issues and prior to that urges SCE to respond to the Joint Parties questions so that questions surrounding resource valuation can be cleared up and addressed. LSA supports timely resolution of these issues and methodologies that are both transparent and fairly value the attributes of all renewable resources. However, given SCE’s recent record of procuring from a wide range of

⁵ Joint Comments of SDG&E, SCE and PG&E on the Draft 2016 RPS Procurement Plans (Sep. 1., 2016), pp. 1-2; IEP Comments, p. 24.

⁶ Comments Of The California Biomass Energy Alliance, California Wind Energy Association, Calpine Corporation, Geothermal Energy Association And Ormat Nevada, Inc. (the “Joint Parties”), On The RPS Procurement Plans Of The Investor-Owned Utilities (Sep. 1, 2016), p. 4-5, Data Request Question 1.

resources in and outside of California following the 2014 Solicitation (including, Wind, Geothermal and Solar PV and Solar Thermal) and the pending implementation of long-term ELCC values and changing TOD periods, LSA questions the premise of the Joint Parties that LCBF unfairly favors solar PV resources. For these reasons, and the need for procurement opportunities to support a vibrant renewables market as a whole, LSA does not support any delay in planned solicitations should LCBF reform not be resolved in a timely fashion.

Conclusion

LSA appreciates the opportunity to provide reply comments on the Draft 2016 RPS Plans and requests the final plans be revised as recommended above.

Dated: September 16, 2016

Respectfully Submitted,

/s/ Rachel Gold

Rachel Gold

Policy Director

Large-scale Solar Association

2501 Portola Way

Sacramento, California 95818

Tel: (510) 629-1024

Email: rachel@largescalesolar.org

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 *Reply Comments Of The Large-Scale Solar Association On The Draft 2016 RPS Plans* 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 September 16, 2016 at Berkeley, California.

/s/ Rachel Gold

Rachel Gold
Policy Director
Large-scale Solar Association