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

Order Instituting Rulemaking to Continue  
Implementation and Administration of the  
California Renewables Portfolio Standard  
Program.

Rulemaking 11-05-005  
(Filed May 5, 2011)

**COMMENTS OF BP WIND ENERGY NORTH AMERICA INC.  
ON PROPOSED DECISION IMPLEMENTING PORTFOLIO CONTENT  
CATEGORIES FOR THE RENEWABLES PORTFOLIO STANDARD PROGRAM**

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Attorney for BP Wind Energy North  
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Dated: October 27, 2011

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**CATEGORIES FOR THE RENEWABLES PORTFOLIO STANDARD PROGRAM**

On October 7, 2011, the Proposed Decision of Administrative Law Judge Anne E. Simon Implementing Portfolio Content Categories for the Renewables Portfolio Standard Program ("PD") was issued for comment. The PD focuses on new Section 399.16 of the Public Utilities Code enacted by SB2 (1X) and, among other things, interprets and implements the new statutory provisions establishing three new portfolio content categories for the Renewable Portfolio Standard ("RPS") program.

BP Wind Energy North America Inc. ("BP Wind Energy") supports the PD's interpretation and implementation of the portfolio content categories. As noted in the comments submitted by BP Wind Energy in this proceeding on August 8, 2011 ("August 8 Comments"), BP Wind currently owns and operates through a subsidiary the Edom Hills wind farm located in Riverside County, California. BP Wind also operates and has an ownership interest in a 125 MW wind facility located in Bonneville County, Idaho, the entire output of which is sold to Southern California Edison Company under a 20-year power purchase agreement. With respect to development, BP Wind Energy is developing both wind and solar projects inside the State of California. Additionally, as described in more detail in the August 8 Comments, BP Wind

Energy has two wind projects under development outside the State that could help California achieve its RPS goals and benefit California's consumers.

The PD provides greater clarity and certainty to purchasers under the RPS program as well as to developers and producers of clean, renewable energy and especially those, such as BP Wind Energy, developing and operating wind generation facilities located outside of California that are interested in supplying California with clean, renewable energy to assist the State in meeting the nation's most ambitious clean energy standard. That clarity and certainty is essential to the underlying foundation of the RPS program and RPS markets in general until these advanced technologies are fully commercialized.

Therefore, BP Wind Energy strongly urges the Commission to adopt the PD.

DATED: October 27, 2011

/s/ Seth D. Hilton

Seth D. Hilton

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**VERIFICATION**

I am the attorney for BP Wind Energy North America Inc. (“BP Wind Energy”), and am authorized to make this verification on BP Wind Energy’s behalf. BP Wind Energy is unable to verify the foregoing document in person as BP Wind Energy is located outside of the County of San Francisco, where my office is located. I have read the foregoing **COMMENTS OF BP WIND ENERGY NORTH AMERICA INC. ON PROPOSED DECISION IMPLEMENTING PORTFOLIO CONTENT CATEGORIES FOR THE RENEWABLES PORTFOLIO STANDARD PROGRAM** and am informed and believe, and on that ground allege, that the matters stated are true and correct to the best of my knowledge.

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

Executed this 27th day of October, 2011, at San Francisco, California.

*/s/ Seth D. Hilton*  
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