BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Develop Additional Methods to Implement the California Renewables Portfolio Standard Program.	Rulemaking 06-02-012 (February 16, 2006)

POST-WORKSHOP COMMENTS OF THE CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES ON TRADABLE RENEWABLE ENERGY CREDITS

November 13, 2007

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POST-WORKSHOP COMMENTS OF THE CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES ON TRADABLE RENEWABLE ENERGY CREDITS

The Center for Energy Efficiency and Renewable Technologies (CEERT) respectfully submits its Post-Workshop Comments on Tradable Renewable Energy Credits (TRECs). These comments are timely filed and served on the service lists for Order Instituting Rulemaking (R.) 06-02-012, R.06-05-027, R.06-03-004, and R.06-04-009, with paper copy provided to ALJ Simon, as required by the Administrative Law Judge's Ruling issued in this proceeding on October 16, 2007 (October 16 ALJ's Ruling).

I.

THE "STRAW PROPOSAL" IS THE APPROPRIATE FOCUS FOR THE POST-WORKSHOP COMMENTS AND A COMMISSION DECISION APPROVING USE OF TRADABLE RECS FOR RPS COMPLIANCE.

CEERT, along with several of its participating environmental organizations and renewable energy developers, attended and contributed to the Commission's workshop on the use of tradable renewable energy credits (TRECs) for compliance with California's Renewable Portfolio Standard (RPS) Program held on September 5 through 7, 2007. CEERT, which also filed pre-workshop comments on August 17, 2007, believes that the three-day workshop, along with relevant party comments, provide a robust record on which the Commission can adopt and incorporate tradable RECs among the procurement options available to RPS-obligated load serving entities (LSEs) for meeting their RPS targets.

In particular, the Energy Division's "straw proposal" for using tradable RECs for RPS compliance offered on the final day of the workshop provided an appropriate, basic framework for incorporating this important procurement option in the RPS Program. With some minor changes, CEERT generally supported the "straw proposal."

The October 16 ALJ's Ruling, while offering a revised version of that "straw proposal" for party comment, has also re-introduced a layer of complexity to this issue, which was part of the pre-workshop ALJ's Ruling and which continues to be both unwarranted and unnecessary. Like the earlier ruling, many of the questions asked by the October 16 ALJ's Ruling are either irrelevant or simply cannot be, and do not need to be answered, for the Commission to decide that tradable RECs *can* be included among the *options* available to RPS-eligible generators and obligated LSEs to permit them to produce and procure the renewable energy needed to meet RPS goals. In addition, CEERT is disappointed that additional or changed conditions and limits on the use of tradable RECs for RPS compliance have been added to the Energy Division's "straw proposal," as appended to the ruling, since it was first presented at the close of the workshop (September 7, 2007).

The October 16 ALJ's Ruling also asks extensive questions about (1) the economic analysis on REC market design in California presented by Dr. Jurgen Weiss at the workshop and (2) the applicable standard term definition for REC attributes. CEERT, however, believes that, at this point, the focus of these comments, and the Commission's attention, should be on the "straw proposal," which was a direct outcome of the 3 days of workshops and was responsive to the robust record developed on this issue during the workshop, including *all* of the presentations, panel discussions, and participants' comments. Exclusive reliance on Dr. Weiss's presentation, as opposed to the full workshop record, has limited value since his analysis relates almost

exclusively to trading RECs on the spot market and not procuring RECs by contracts that will be longer term, less volatile, and less costly. Dr. Weiss's presentation also incorrectly assumes, without support, that RPS markets are the same as REC markets.

As to the definition of REC "attributes," many of the questions asked in the October 16 ALJ's Ruling, as in the pre-workshop ALJ's Ruling, relate to implementation details of Assembly Bill (AB) 32 (greenhouse gas (GHG) emissions reduction) that remain unknown at this time and do not need to be resolved to include TRECs among an LSE's procurement options used to comply with its RPS targets. For now, absent further legislation, the RPS-adopted standard terms and conditions governing REC attributes do not require change to facilitate the use of tradable RECs for RPS compliance.

Again, CEERT remains concerned, as stated in its Pre-Workshop Comments, that the approach being taken in the questions posed in both the pre-workshop and post-workshop ALJ's Rulings, add "unwarranted complexity to the task at hand" and even read "as a challenge to the ongoing effectiveness and relevancy of the RPS itself."[1] As noted by CEERT in its pre-workshop comments, and apparently still relevant now:

> "While other procurement policies may [be] evolving today (i.e., GHG emissions reduction), none require that the RPS Program be displaced and instead [these policies] will be well served by ongoing enforcement of the RPS procurement mandate. The RPS Program has been *in effect* for more than 4 years. Enormous time and resources have been spent on its implementation, and it continues to impose on an obligated load serving entity (LSE) the central requirement to increase its renewables procurement to meet 20% of its retail sales by 2010. The only question pending now before the Commission is whether and how a single, additional and voluntary procurement option [TRECs] can be added to the already existing RPS-compliant procurement options to further the RPS goal and the EAP II goal of 33% renewables by 2020."[2]

[1] CEERT Pre-Workshop Comments, at p. 3.
[2] CEERT Pre-Workshop Comments, at p. 3; emphasis original.

CEERT believes that this question has been answered in large part by the Energy Division's "straw proposal," as it was presented at the close of, and based on the full record from, the TREC workshops. For this reason, CEERT's focus in these comments is on the "straw proposal," as now modified in the October 16 ALJ's Ruling. CEERT responds to the other questions posed by the October 16 ALJ's Ruling to the extent they are relevant or add value to the "straw proposal" and CEERT's position on that proposal. In general, CEERT continues to support the "straw proposal," but believes that changes are required to ensure that tradable RECs will be effectively incorporated as a valuable and meaningful procurement option in the RPS Program.

II.

CEERT SUPPORTS THE "STRAW PROPOSAL" WITH MODIFICATIONS.

A. Overview

CEERT first notes that several significant, substantive changes were made by Energy Division between its "straw proposal" as originally offered at the conclusion of the TREC Workshop (September 7 "straw proposal") and as attached to the October 16 ALJ's Ruling (Attachment E "straw proposal"). While CEERT had concluded that certain modifications of the original "straw proposal" were in order, it has greater concerns with some of the changes and additions made in the Attachment E "straw proposal." While CEERT would prefer to work from the September 7 "straw proposal," to avoid any confusion in trying to compare the two "straw proposals," CEERT will offers its comments and suggested revisions based on the Attachment E "straw proposal," offering, only where appropriate, any reinstatement of recommendations from the previous straw proposal. As stated above, CEERT has incorporated responses to the

questions posed regarding the "straw proposal" included at pages 8 to 11 of the October 16 ALJ's Ruling, as relevant.

B. The Commission Should Avoid Creating Inappropriate Barriers to the Use of Tradable RECs or Other Procurement Options that Can Facilitate RPS Compliance.

In Questions 1 and 2 of the October 16 ALJ's Ruling, and their multiple subparts, parties are essentially asked to forecast and quantify what the precise impacts will be of including tradable RECs among RPS procurement options. While CEERT clearly sees a value in developing a framework for incorporating tradable RECs as *one*, among many, RPS procurement options, this level of certainty cannot be achieved today for *any* RPS procurement option.

CEERT does not believe that limited state and stakeholder resources should be applied to foretelling the future impacts of any kind RPS procurement option, especially as compared to or integrated with a non-existent and only "possible market of tradable allowances for compliance" with AB 32.[3] Instead, the focus should be on understanding the overall value of *adding* tradable RECs *among* RPS-compliant procurement options and developing a process for incorporating this option in the current RPS Program that recognizes this value and fairly treats and protects all participants, especially ratepayers.

With respect to that value, those who offered input and comment at the workshop agreed that adding REC contracts as a procurement option for RPS compliance has significant value. CEERT's own views on this issue, as stated in its Pre-Workshop Comments, were re-enforced by many parties at the workshop and remain relevant as a response to related questions posed by the October 16 ALJ's Ruling:

> "There are also multiple benefits to buyers and sellers of renewable generation in permitting REC transactions to be included in RPS compliant procurement options. For both, having the ability to transact RECs enhances the

[3] October 16 ALJ's Ruling, at p. 9.

ability to meet RPS requirements and optimize renewable resources used to produce electric generation. In contrast, a single method of contracting with a single set of buyers does not necessarily promote a robust market or liquidity.

. . . . . .

"REC transactions among multiple counterparties, will aid in developing liquidity and forming a robust market to support the development of renewable resources in California and throughout the WECC. This robust market will help renewable project developers to have some insight into what revenue streams may be available from the REC market, which in turn will allow those developers to more effectively evaluate the economics and viability of a given project.

"In particular, adding REC transactions to other RPS-compliant procurement options recognizes that each LSE has different needs, and increasing options will increase the potential for finding products that better match these needs. In addition, short-term REC transactions can help increase compliance in the event of other contract failures or energy delivery shortfalls. Procurement of RECs generated from eligible out-of-state facilities located within the WECC region will add to the procurement options available to LSEs to meet their RPS annual procurement targets (APTs) and will also facilitate renewable energy projects being developed in the most cost-effective regional locations.

"Finally, given the track record of other well-functioning REC tracking and trading systems in the country that have been designed by the same team that has designed WREGIS (APX, Inc.), the procurement, transfer, and tracking of RECs to meet RPS requirements should be extremely efficient and provide consumer confidence. WREGIS certainly can serve to facilitate REC transactions, as intended."[4]

As to appropriate integration of this option into the RPS Program, CEERT believes that the basic structure of the Energy Division's "straw proposal" can achieve this end with certain modifications. Below CEERT addresses the Attachment E "straw proposal" and offers its position and recommended changes, if any, on each topic area.

C. With Modifications, the Attachment E "Straw Proposal" Should Be Adopted by the Commission to Authorize Use of Tradable RECs for RPS Compliance.

CEERT offers the following comment and suggested modifications to each topic area of the Attachment E "straw proposal." As modified, the "straw proposal" should be used by the Commission to authorize the use of tradable RECs for RPS compliance.

[4] CEERT Pre-Workshop Comments, at pp. 22-24.

MARKET PARTICIPANTS

Attachment E:

The Attachment E "straw proposal" recommends that there be "no limits on market participation" in the California compliance REC market.[5] However, in answering the question of whether the REC trading rules should differ for non RPS-obligated entities, the Attachment E "straw proposal" states: "To the greatest extent possible, rules should be consistent for all participants."[6]

CEERT Position/Proposed Modifications:

CEERT asks that the Commission modify this recommendation slightly by adopting a policy that will impose no limits on tradable REC market participation and that will ensure that tradable REC rules will be consistent for all participants. On this latter point, CEERT does not support the preface "to the greatest extent possible," added by the Attachment E "straw proposal." Such language only creates uncertainty and unnecessary confusion, as the rationale offered for adding the language does not explain on what basis the rules would be considered "consistent."

Therefore, CEERT recommends that the recommendations on "Market Participation" read as follows:[7]

"There are no limits on market participation."

"~~**To the greatest extent possible,**~~ Rules should be consistent for all participants."

[5] October 16 ALJ's Ruling, Attachment E, at p. 1.
[6] October 16 ALJ's Ruling, Attachment E, at p. 1.
[7] All additions are indicated in bold time; all deletions are indicated by bolds strikethrough.

TREC USAGE LIMITS

Attachment E:

The Attachment E "straw proposal" recommends that a "minimum quota mechanism, similar to the one set forth in D.07-05-028 for short term contracts, will be applied to TRECs."[8] According to Attachment E, this minimum quota will restrict LSEs, in any calendar year, from counting tradable REC contracts for RPS compliance unless, in the same calendar year, the LSE signs long-term bundled contracts or bundled contracts with new facilities whose aggregated annual expected deliveries total at least 0.25% of its prior year's retail sales.

CEERT Position/Proposed Modifications:

CEERT is quite concerned about the application of the "minimum quota" adopted in D.07-05-028 to tradable RECs transactions, an issue that was not considered at the time of this decision. Specifically, this approach requires an LSE to sign either long-term bundled contracts or bundled contracts with new facilities as a prerequisite to permitting tradable REC procurement. CEERT can well imagine years in which the LSE *does not sign any* long-term or new facility bundled *contracts* or can guarantee that those it does sign will eventually result in energy deliveries totally at least 0.25% of its prior year's sales. During such years, the "minimum quota" described in the "straw proposal" would preclude LSEs from using tradable RECs, thus deterring LSEs from ever entering a long-term tradable REC contract. In addition, LSEs would be precluded from signing contracts for short-term tradable RECs, even if they were a more cost-effective means for an LSE to meet its RPS targets in any given year.

It must be remembered that a tradable REC is *only* a procurement *option* and it makes little sense to restrict such an option, especially when it will never, on its own, diminish or

[8] October 16 ALJ's Ruling, Attachment E, at p. 1.

replace long-term contracts as the primary means of developing new renewable projects. In fact, given the Commission specifically recognized in D.07-05-028 that, pursuant to Public Utilities (PU) Code Section 399.14(b)(2), it had the discretion to set the minimum quantity at any level that reasonably contributes to the goals of the RPS program," including "*zero.*"[9]

Under these circumstances, CEERT believes that the Commission should conclude that the minimum quantity or quota applied to tradable RECs, especially at the inception of its use as an RPS-compliant procurement option, should be set at zero to increase market liquidity and participation. Preferably, of course, the minimum quantity or quota should be set to zero for all RPS procurement options to encourage their use, as appropriate to the circumstances, in meeting RPS targets.

For these reasons, it is CEERT's *primary recommendation* that *no "minimum quota"* or quantity of bundled contracts be adopted as a condition precedent for use of tradable RECs. However, in the spirit of compromise and to expedite the approval of a process that will permit REC transactions, CEERT asks *alternatively* that the Attachment E "straw proposal" at least be modified to read:

> "A minimum quota mechanism, similar to the one set forth in D.07-05-028 for short term contracts, will be applied to **short-term** ~~T~~RECs **contracts**. **No minimum quota will be applied to long term (10 years or more) REC contracts.**
>
> **"**The minimum quota will allow, in any calendar year, LSEs to count short-term REC contracts for RPS compliance only if, in the same calendar year, the LSE signs **or receives energy deliveries from** long-term bundled or unbundled contracts or bundled contracts with RPS-eligible facilities whose aggregated annual expected deliveries total at least 0.25% of its prior year's retail sales."

[9] D.07-05-028, at pp. 12-14; emphasis added.

In response to whether the CPUC should require a certain portion of TREC contracts to be long-term, the September 7 "straw proposal" recommended that the Commission should not require TREC contracts of any particular length. This recommendation should be incorporated into the Attachment E "straw proposal" on TREC Usage Limits as follows:

"**The Commission should not require REC contracts of particular lengths.**"

FLEXIBLE COMPLIANCE: BANKING

***Attachment E**:*

Attachment E recommends: (1) In order for tradable RECs to be used for RPS compliance, they must be retired in WREGIS within 3 compliance years (including the compliance year in which it was generated), and (2) after RECS are retired in WREGIS, they can be banked indefinitely for RPS compliance purposes. Attachment E also adds the following "tracking" mechanism: "The flexible compliance for RECs and RPS bundled procurement will be tracked by the Compliance Spreadsheets submitted as part of the biannual Compliance Reports."[10]

CEERT Position/Proposed Modifications:

CEERT agrees with this approach and has no proposed modifications to make to these recommendations.

FLEXIBLE COMPLIANCE: EARMARKING

***Attachment E**:*

Attachment E recommends that "[n]o tradable RECs can be used for earmarking." Attachment E also states that "[n]o forward REC contracts can be used for earmarking."[11]

[10] October 16 ALJ's Ruling, Attachment E, at p. 2.
[11] October 16 ALJ's Ruling, Attachment E, at p. 4.

CEERT Position/Proposed Modifications:

CEERT agrees with this approach and has no proposed modifications to make to these recommendations.

TREATMENT OF BUNDLED CONTRACTS

Attachment E:

Attachment E recommends: (1) Beginning January 1, 2009, an LSE can unbundle and sell the RECs (that are tracked in WREGIS) from currently operational RPS projects, but once the RECs are sold, they cannot be used for RPS compliance by the selling LSE and the "null power" also cannot be used for RPS compliance by any LSE; (2) beginning January 1, 2009, LSEs can unbundle and sell RECs (that are tracked in WREGIS), on a forward basis, from CPUC-approved RPS projects that are not yet online, but once the RECs are sold, they cannot be used for RPS compliance by the selling LSE, and the null power also cannot be used for RPS compliance; and (3) LSEs cannot unbundle the first year of a bundled contract if it has been set aside for RPS earmarking, but can unbundle subsequent years of such a contract.[12]

CEERT Position/Proposed Modifications:

CEERT has no objection or proposed modification to the basic resolution of this issue, with one exception. CEERT believes that the reference to "null power" is incorrect, as "null power" could never be used for RPS-compliance. If this language is left in, it could confusion among those participating in REC transactions. Specifically, the only issue before the Commission today is whether a tradable REC can be used for RPS compliance. Once power has been stripped of its REC, it is no longer eligible for the RPS Program.

[12] October 16 ALJ's Ruling, Attachment E, at pp. 5-6.

For this reason, CEERT asks that the following sentence be eliminated in each of the recommendations made on this topic area in Attachment E as follows:

"**~~The null power also cannot be used for RPS compliance by any LSE~~**."

COST RECOVERY

Attachment E:

Attachment E includes three subjects for recommendation, stated as follows: (1) review process, (2) "price evaluation" (to evaluate whether a REC contract price is reasonable), and (3) use of standard terms and conditions in TREC contracts.[13] As to the *review process*, Attachment E recommends that long term REC contracts (10 years or more), either from a solicitation or bilateral negotiation, be filed with the CPUC by advice letter; short term REC contracts should follow the same approval process established for short-term bundled contracts, even though the Commission has yet to issue a decision on that process, which, therefore, remains unknown today. For *price evaluation criteria*, Attachment E recommends that IOUs should solicit REC contracts in their annual renewable RFOs and, as part of this process, the IOUs must modify their least cost, best fit (LCBF) evaluation methodologies to short list the most competitive REC contracts. Attachment E further recommends that the LCBF methodology should compare the benefits and costs of bundled contracts with REC transactions and evaluate them relative to the LSE's entire RPS portfolio. Significantly, Attachment E adds a recommendation that was not part of the original "straw proposal," which imposes a "*price cap*" for any REC contract (short term or long term; solicitation-based or bilateral) set at $35/REC levelized using the IOU's approved discount rate. For *standard terms and conditions*, Attachment E requires each REC

[13] October 16 ALJ's Ruling, Attachment E, at pp. 6-8.

contract to contain the CPUC-approved term identifying the RECs and their attributes transferred to the buyer, and this term is non-modifiable.

CEERT Position/Proposed Modifications:

One of the values of a REC transaction is that it can permit an RPS-obligated LSE to quickly respond to opportunities to procure available and qualified RECs. For this reason, an elaborate or prolonged review process for short-term REC contracts will defeat the purpose of having this option available to meet RPS targets. To that end, while CEERT, as it indicated in its Pre-Workshop Comments, recognizes a value in establishing at least an overall benchmark of cost reasonableness for REC procurement, CEERT does not think that, at this early stage of using RECs for RPS compliance, this benchmark should be stated as a strict "cap" nor should it be set at a price that is inconsistent with the applicable penalty. In particular, CEERT believes, as it stated in its pre-workshop comments, that the Commission should be guided by the "Alternate Compliance Payment" approach that has been used by other states in their RPS Programs.[14]

In this regard, Attachment E seems to suggest that setting a cap below the penalty is appropriate. CEERT strongly disagrees. Further, Attachment E offers no basis or record for selecting a $35/REC value, other than it "is not economically reasonable for a utility to buy a $50 REC."[15]

A REC is a market mechanism, and the market, characterized by supply and demand, will determine the value. Obligated LSEs are not going to procure RECs at a cap or benchmark price just because that is the cap. Any action taken by the Commission to cap that price today will

[14] CEERT Pre-Workshop Comments, at pp. 20-21.
[15] October 16 ALJ's Ruling, Attachment E, at p. 7.

only create disincentives to renewables procurement and serve to inappropriately influence and constrain the RECs market. Such a step should, therefore, clearly be avoided.

As an example, by setting a cap ($35/REC) below the current penalty for failure to meet RPS targets ($50/REC), the result is that an obligated LSE would be required to forego a REC purchase and pay more for failing to meet its RPS obligations if the cost of the REC were above the cap ($40/REC), but below the penalty ($50). California is certainly not benefited from such an outcome, which effectively puts a chill on increasing renewables generation in this state. The economic reasonableness for procuring tradable RECs will change over time and should be established by the willing buyers and sellers, subject to review by the Commission.

For these reasons and as discussed in CEERT's pre-workshop comments,[16] CEERT strongly recommends that *no price cap* be placed on REC procurement prices and, *at the most,* only a "reasonableness benchmark" be adopted that is the same as the penalty for RPS non-compliance. Further, the adopted review process should be one that enhances, not detracts, from having RECs available as a procurement option. Any such process should also be one that can be identified today and not subject to a future decision and unknown outcome. As noted above, the "approval process" for "short-term bundled contracts" has not yet been decided by the Commission.

Therefore, Attachment E should be modified as follows:

[16] In CEERT's Pre-Workshop Comments, CEERT proposed the following:

> "CEERT proposes that on an annual basis each LSE report to the Commission on the number of REC transactions each has completed in the year, the individual cost and length of each transaction, the cumulative cost of these transactions, and the percentage of the LSE's annual and overall RPS targets represented by REC transactions. Consistent with PU Code §399.16, cost recovery of this procurement by electric corporations should be allowed, with the "penalty" of $50/MWhr serving as the upfront and per se reasonableness standard for a REC transaction of less than five years in length. If the Commission determines that a correction in its rules governing REC transactions is required, that direction can be made by the Commission at the time of its annual review to respond with a rule revision made effective on a prospective basis." (CEERT Pre-Workshop Comments, at p. 21.)

"Review Process: ~~Long-term REC contracts (either solicitation-based or bilateral) must be filed with the Commission by advice letter. All short-term REC contracts should follow the same approval process that is established in R.06-02-012 for short-term bundled contracts.~~ **On an annual basis, each LSE should report to the Commission the number of REC transactions it has completed in the year, the individual cost and length of each transaction, the cumulative cost of these transactions, and the percentage of the LSE's annual RPS targets represented by REC transactions. An LSE should be permitted to enter short-term REC transactions, regardless of source, without Commission pre-approval, but may seek such pre-approval by advice letter. Only long-term REC contracts (either solicitation-based or bilateral) should require Commission approval by advice letter.**

"Price Evaluation Criteria: IOUs ~~should~~**can** solicit REC contracts in their annual renewable RFOs. As part of this process, the **IOUs**' ~~IOUs must modify their~~ least-cost, best fit (LCBF) evaluation**s** ~~methodologies~~ to short list the most competitive REC contracts~~. The LCBF methodology~~ should compare the benefits and costs of bundled contracts with REC transactions**.** ~~and evaluation of them relative to the LSE's entire RPS portfolio.~~

"A ~~price cap~~ **price reasonableness benchmark** will also be used to protect ratepayers from unreasonable costs. The **price reasonableness benchmark** ~~price cap~~ for any REC contract (short term or long term; solicitation-based or bilateral) **must be the same as the penalty for non-compliance to avoid creating any incentives for RPS non-compliance and inappropriately influencing the market. The penalty is currently $50/MWh**~~is $35/REC levelized using the IOU's approved discount rate~~.

"~~Bilateral REC contracts are allowed also and are subject to the $35/REC levelized price cap~~."

Standard terms and conditions: Each REC contract must contain a Commission-approved term identifying the RECs and their attributes transferred to the buyer. This term is not modifiable."

D. Evidentiary Hearings Are Not Required.

As stated above, it is CEERT's position that the three days of workshops on using tradable RECs for RPS compliance, coupled with relevant party comments, provide a robust record on which the Commission can approve and incorporate the use of tradable RECs for RPS compliance. There are no material issues of fact relevant to such a decision that are in dispute, and no evidentiary hearings are required.

V.

CONCLUSION

CEERT appreciates the time and attention that have been devoted by this Commission and the California Energy Commission and their respective staffs to timely review and resolution of the issue of using tradable RECs for RPS compliance. With the launch of WREGIS, CEERT asks that the Commission quickly move to permit the use of tradable RECs for RPS compliance based on the recommendations offered by the Energy Division's Straw Proposal in Attachment E to the October 16 ALJ's Ruling, as modified as recommended by CEERT in these post-workshop comments.

Respectfully submitted,

November 13, 2007

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CERTIFICATE OF SERVICE

I, Sara Steck Myers, am over the age of 18 years and employed in the City and County of San Francisco. My business address is 122 - 28th Avenue, San Francisco, California 94121.

On November 13, 2007, I served the within document **POST-WORKSHOP COMMENTS OF THE CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES ON TRADABLE RENEWABLE ENERGY CREDITS,** in R.06-02-012, by electronic service on the service lists in R.06-02-012, R.06-05-027, R.06-04-009, and R.06-03-004 (attached), with a hard copy provided to ALJ Simon by U.S. Mail, as prescribed by Rule 1.10 of the Commission's Rules of Practice and Procedure and the ALJ's Ruling of October 16, 2007, at San Francisco, California.

Executed on November 13, 2007, at San Francisco, California.

/s/ SARA STECK MYERS
Sara Steck Myers

R06-02-012, R06-05-027, R06-04-009, and R06-03-004
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R06-03-004

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R06-02-012

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