



Submitted Comments on Clarification of Station Service Discussion

8/19/2011

I urge the WREGIS Committee to reject the proposed changes to the definition of Station Service in the WREGIS Operating Rules.

Thank you.

Ron Bingaman

Sierra Green Energy, LLC.

8/15/2011

Comment to WREGIS on Clarification of Station Service Discussion

The California Biomass Energy Alliance (CBEA) is a trade association comprised of the State's solid fuel biomass electricity generating facilities. There are 33 such biomass facilities spread throughout 19 counties in California, generating over 600 MWs of renewable power, which is approximately 1½% of the overall power generated in the State, and 17½% of all the renewable power. All of these facilities are having WREGIS Certificates created for their RPS-eligible output, either as individual account holders, or through their purchasing utilities.

CBEA supports the changes that have been suggested for Section 9.6 of the Operating Rules. However, we strongly oppose the changes suggested for the definition of Station Service. The existing, single-sentence definition is the industry-standard definition of station service, and is entirely appropriate for use in the Operating Rules. It is the definition that authorities overseeing the various renewables programs that use WREGIS for purposes of monitoring compliance would reasonably expect to be used. There is no question that the WREGIS certificate today, with the existing definition for Station Service in place, is fully accepted by all of the programs that require its use, and as far as we know, no party has questioned its integrity.

As an industry that routinely has to transport fuel, we see no reason why that activity should legitimately be folded into Station Service, any more than the transport of chemicals and supplies should be. While the energy for biomass-fuel delivery currently is supplied by non-electrical means, we believe that instituting what would in effect be a penalty for the conversion of fuel-delivery equipment to operate on electricity, as this proposed change would do, is completely contrary to overarching public-policy goals to reduce emissions of all varieties, and it is not in any way needed to enhance the acceptability of WREGIS certificates in the marketplace.

We urge the WREGIS Committee to reject the proposed changes to the definition of Station Service in the WREGIS Operating Rules.

Thank you for the opportunity to comment.

Julee Malinowski-Ball

California Biomass Energy Alliance (CBEA)

8/15/2011

Sierra Pacific Industries (SPI) appreciates the opportunity to comment on the proposed changes to the definition of Station Service and to Rule 9.6.

Regarding the definition of Station Service, SPI opposes the proposed language changes. First, the existing definition is perfectly adequate, and is widely accepted and has been in use in the industry for quite some time. Second, SPI is concerned that the inclusion of the phrase "including any electrically driven fuel delivery, while the Generating Unit is generating electricity" is overly broad and may have serious, unintended consequences. For example, SPI may determine that at some point front loaders that are currently diesel powered would be replaced with electric drive units. The result of this proposed language would be to reduce the RECs created at our biomass cogeneration facilities simply because SPI took action to reduce diesel emissions.

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As to the proposed changes to Rule 9.6, SPI finds the existing rule adequate and not in need of change. The proposed penultimate paragraph is confusing and does not supplement clarity of the operating rules.

Finally, as SPI understands the purpose of WREGIS, it is to serve as a clearing house for REC certificates with a principle purpose to avoid double counting of those certificates. WREGIS is not intended to be a policy making entity. Therefore, the determination of whether Station Service should be counted toward certificate creation (as it is in Nevada) or not, should be left to each program administrator, and not WREGIS.

David Branchcomb

Sierra Pacific Industries

8/15/2011

The WREGIS proposed rule change regarding Station Service could create severe hardship and cause financial distress to both operators and utility off-takers, if this rule were to take effect.

Incidental electrical use by an unrelated facility should not result in a penalty to a solid fuel generating facility as the processes used to create the biomass fuel are not necessarily ancillary to the generation process. A lumber mill or other processing facility does not use electricity, or other energy to create biomass fuel. The fuel is a by-product of the process mill's wood processes.

Additionally, this rule, as others have pointed out here, could result in a processors switching to hydrocarbon driven machinery to minimize the loss of REC value to the end user.

Station Service or Parasitic Load has always been clearly defined as just that, power generated and consumed in the related on-site processes. Any change from that concept could wreak havoc in the biomass community. Please reconsider.

Thom Shelton

Industrial Power Technology

8/15/2011

Shell Energy North America (US), L.P. ("Shell Energy") respectfully submits its comments on WREGIS' proposed change to the definition of "Station Service" in its Operating Rules. Shell Energy opposes that portion of the proposed definition that includes "any electrically driven fuel delivery" that may occur upstream of the generating unit. The proposed language is overly broad. The proposed language is beyond WREGIS' authority as set forth in its Charter. The proposed language, if adopted, would improperly reduce the number of renewable energy credits ("RECs") that may be claimed based on the output of an eligible renewable energy resource.

The current definition of Station Service is properly limited to the "electrical supply for the ancillary equipment used to operate a generating station or substation." The proposed language, however, appears to include, as a part of Station Service, any electrical power that is required to deliver a renewable fuel (e.g., biogas) from the source of the fuel to the generating unit. The language is overbroad and would include electrical power that is physically and technologically removed from the "operation [of] a generating station or substation."

For biogas that is delivered to a generating unit via pipeline, the proposed definition would include the electrical power (if any) used in compressors along the pipeline. This electrical power is accounted for in the price of gas transportation, however. Moreover, this electrical power does not diminish the amount of biogas that is delivered to the generating unit, and it does not diminish the quantity of electricity produced at the generating unit.

If the compressors along the pipeline are gas-fired, there may be an in-kind fuel adjustment to the shipper's delivered gas volumes. The in-kind fuel adjustment made by the gas pipeline company, which can be accounted for with other natural gas supplies, does not reduce the quantity of biogas that is delivered to the generating unit. The REC generated at the generating unit should reflect the output associated with all of the biogas delivered to the generating unit, less only the amount of electrical power for "equipment used to operate [the] generating unit"

The proposed language - "any electrically driven fuel delivery" - would improperly broaden the definition of Station Service to include electric power that is associated with upstream production or transportation of a renewable fuel. This language is inconsistent with the concept of Station Service and should not be adopted by WREGIS. WREGIS' mission, as set forth in its Charter, is to "track renewable energy generation from units that register in the system using verifiable data and create[] [RECs] for this generation." Nothing in WREGIS' Mission or Charter allows WREGIS to reduce the output from a registered generating unit by the amount of electrical power used in the production or transportation of a fuel that is delivered to the generation unit.

Shell Energy respectfully requests that WREGIS eliminate this language from the proposed definition. Shell Energy would be willing to participate in a workshop to discuss this issue in greater detail.

John Leslie

Attorney for Shell Energy North America

8/15/2011

I do not believe that the amount of transportation fuel used to bring fuel to the plants should be used to calculate the parasitic load of the renewable energy facility. This is not what is used by the Federal Energy Regulatory Commission as an industry standard. This new rule could dramatically reduce the REC's that we generate and could cause our plant to be in jeopardy of having monetary fines under our contract with the investor owned utility. This new change to the rule would give wind and PV credit while hurting biomass renewable plants.

John Richardson

Community Renewable Energy Services, Inc.

8/15/2011

The Station Load Proposal, as presently drafted, is confusing and undoubtedly will have unintended consequences which will harm, rather than help, renewable development and REC certification. The Independent Energy Producers Association ("IEP") recommends delaying any pending decision on this matter. For example, additional editing will be required to clarify what "electrically driven fuel delivery" means. Similarly, the reference to "electricity consumed by the Generating Unit while it is not generating electricity" remains unclear.

IEP appreciates your attention to this matter.

Steven Kelly

IEP

8/15/11

SDG&E would like to see the appropriate agency define station service in line with the policies as set forth for RPS Compliance.

Linda Watts

San Diego Gas & Electric

8/15/2011

TSS Consultants is biomass development and consulting firm established in 1986 to service the biomass industry in the United States. Being located in California, we are particularly cognizant of the industry here and current challenges it faces now and into the future. Having the largest biomass electric power generation capacity in the United States, California has developed a substantial biomass processing network which draws from urban, agricultural and forestry woody biomass sources. Specifically 95% of fuel generated for CA's biomass plants ranging from .5MW to 50MW comes from the use of 400hp - 1200hp diesel grinders.

The California Air Resources Board, (CARB), and local air districts in California strongly support and encourage the conversion of stationary grinding operations, or those that could become stationary, to convert from diesel-fired grinders to electric grinders. CARB and the districts continue to look for, and even mandate, ways to eliminate the use of diesel emission sources especially in the highly polluted Central Valley and nearly all of the urban areas in California

The Station Service rule proposed by WREGIS is counter intuitive. It will penalize biomass plants from purchasing and consuming biomass fuel processed by electric grinders; grinders that now, or in the future, could use renewable biomass power generation. The proposed Station Service rule will not penalize a plant's WREGIS Certificates allotment for fueled generated by a non-renewable energy source, i.e. diesel-fired grinders, and will give an advantage and encourage the continued use of diesel-fired vs. renewable electric grinders. Biomass operators will now need to consider these penalties and likely make the justifiable business decision to receive the most WREGIS Certificates available through using biomass fuel processed through diesel-fired grinders and not the renewable electricity power they are generating.

TSS Consultants firmly believes that the use of electric grinders should be highly encouraged over the use of diesel-fired grinders. We would like our biomass power clients to be able to support and encourage those industries currently using electricity over diesel, or can and are willing to convert from non-renewable to renewable power consumption. WREGIS should not take the opposite approach by adopting the proposed new Station Service definition.

Frederick Tornatore

TSS Consultants

8/15/2011

Comments of Raser Technologies Inc. on Proposal to Change Definition of Station Service under WREGIS Operating Rules

Raser Technologies, Inc. appreciates this opportunity to comment on the proposed change to the definition of "Station Service" under the WREGIS Operating Rules. Under the current rules, "Station Service" is defined as "The electric supply

for the ancillary equipment used to operate a generating station or substation.”

We believe the existing definition is consistent with widely accepted industry practice in that it is restricted to electricity required to operate ancillary equipment that is (i) located within the generating station and (ii) used to operate the generating station itself, rather than electric service used for loads that are (i) physically separate from the generating station and (ii) are not required for the operation of the generating station itself.

“The first option takes the ratio of the total nonrenewable energy (grid electricity and nonrenewable energy inputs) *contributing thermal energy* to the system compared to the total generation of the facility, and subtracts it from one. The contribution of the nonrenewable fuel will be measured by the generation that an equivalent amount of MMBTUs of natural gas would produce at a combined cycle natural gas facility. (emphasis added)

The second option for non-combustion, thermal renewable technologies is to measure the change in the heat content of the medium used to collect the heat attributable to the thermal contribution of the renewable technology. This is done by measuring the heat content of the medium before the heat energy from the renewable source is absorbed and after that heat is absorbed. To use this method, the applicant must provide a single line drawing of the electric generating system identifying every heat source and the proposed points to measure the change in the heat content of the medium. If multiple mediums are used to collect heat at the facility from the thermal sources, the heat added to the system shall be measured using the medium that turns the electric generating turbine.” See pages 33-34 of the CEC Guidebook.

Proposing to include within the definition of “Station Service” electricity utilized for the conveyance or transfer of fuel to a generating station is beyond the WREGIS mandate, and is proposing a change that is contrary to standard industry practice. Station service has traditionally been defined as the electricity required to run lights, pumps, motors, and related equipment located within the generating facility itself. The delivery of fuel to a renewable energy facility is a function that is completely separate from, and independent of, the generation of electricity.

Extending the Definition of Station Power to Electricity Driven Fuel Supply Systems Creates an Arbitrary Distinction that may actually increase Adverse Impacts on the Environment

By singling out fuel delivery systems that are driven by electricity, as opposed to some other energy source, the rule introduces an arbitrary distinction that has troublesome foundation. Under the new rule, if the fuel delivery system is powered by electricity, it is part of “Station Service.” If it is powered by some other fuel source, it doesn’t count as “Station Service.”

Under the new definition, for a geothermal plant, if the geothermal brine is pumped to the generating facility using pumps driven directly by gas turbines or diesel engines, the energy utilized to move the geothermal brine to the plant presumably will not count as “Station Service,” even if the total amount of non-renewable, fossil fuels used to fuel the gas turbines or diesel engines exceeds the equivalent amount of fossil fuel that is required to generate a comparable amount of “brown power” used to run electric driven pumps.

Large fossil fueled electric generating plants normally use fossil fuels more efficiently than smaller, natural gas turbine driven, or diesel fired pumps, and hence, the new definition may actually be counter productive. The adverse environmental impact of using smaller, direct fossil fuel fired pumps to pull the brine from the wells and move it to the generating facility may be greater than utilizing electric driven pumps to accomplish the same purposes. If one is truly concerned about the ultimate environmental impact of the proposed rules, we believe this process should delve more deeply before creating distinctions that have no meaning except within the WREGIS context.

To illustrate yet another inconsistent outcome of the proposed new rule, assume that the brine used to provide heat to a geothermal power plant is pumped into large elevated storage reservoirs during off peak hours and then gravity fed to the generating plant (similar to pumped storage hydro projects). Under this scenario, presumably the electricity used to pump the brine into the reservoirs would not be considered “Station Service” since the fuel was ultimately delivered to the plant by gravity, and the electricity utilized to pump the brine to the storage reservoir would have been purchased during off peak periods. Yet, if the electricity used to pump the brine into elevated storage reservoirs is produced from fossil fuels, the adverse impact on the environment, in terms of air pollution and consumption of fossil fuels, will be the same (or perhaps even greater) as if the electricity had been used to drive electric pumps that provide direct transportation of the brine to the generating facility from the well field.

The CEC Guidebook on the Renewables Portfolio Standard for California does not support the Proposed Change in the Definition of “Station Power”

The Fourth Edition of the California Energy Commission Guidebook entitled *Renewables Portfolio Standard Eligibility*, January 2011, (CEC - 300 - 2010 - 007 - CMF) (“CEC Guidebook”) also does not support the new proposed language. Under both alternative formulas that are authorized to determine the percentage of electricity produced by geothermal plants that is eligible for RPS treatment, there is no requirement that electric energy used to move the geothermal brine to the generating facility be deducted from the output of the plant. Indeed, both formulas focus solely on deductions for the use of non-renewable resources that either (i) increase the temperature of the generating facility’s heat source, or (ii) the temperature of the working fluid that absorbs the heat from the renewable energy source, *not on the electricity used to move the source of thermal energy to the generating facility itself.*

The New Definition of “Station Service,” if adopted, will put Geothermal Generating Facilities at a Competitive

Disadvantage and Discourage the Development of this Important Renewable Energy Resource

Unlike many other forms of renewable energy, geothermal resources provide electricity 24 hours per day, seven days per week. They impose very few negative externalities on the surrounding environment and the use of the surface. Low temperature geothermal resources are becoming increasingly important. They are relatively abundant, but do require higher brine flow rates due to the relatively low btu content of the heat source, and hence the collection of geothermal brine from a larger area (i.e. more wells) in order to provide sufficient heat to the generating plant. Often, these wells must also be drilled deeper, adding to the cost of bringing the brine to the surface.

If the proposed change in the definition of "Station Service" is adopted, low temperature geothermal resources will be placed at a distinct competitive disadvantage with respect to other renewable energy sources, even though low temperature geothermal resources (i) can deliver more electricity over time (including electricity during peak usage periods) per dollar of investment than many other forms of renewable energy, and (ii) offer substantial reliability and other environmental benefits.

In addition, larger flash resource based geothermal plants will also be placed at a considerable disadvantage since they rely on numerous sources of water, often great distances from the generating plant, to be delivered to the steam beds which comprise their fuel source.

Application of the New Definition, if adopted, should be Prospective only, and should not be Retroactively Applied to existing Projects

At a minimum, the modified definition should be applied prospectively only, and should only cover Renewable Energy Projects started after the date the new definition is adopted. If the rule is applied retroactively it will be manifestly unfair to developers of existing projects who relied on the existing definition of Station Service, and never contemplated that the definition would be extended to electrically driven fuel delivery systems. Furthermore, the new definition creates artificial distinctions based on delivery system fuel choices made long ago, and ignores the broader energy and environmental objectives behind the development of renewable energy sources, particularly low temperature geothermal resources.

In Raser's case, had Raser known that the definition of "Station Service" would be extended to include electrically driven fuel delivery systems, Raser would have elected to utilize well field pumps powered by natural gas or diesel fuel for its Thermo project in Utah. Unfortunately, Raser had no idea that a change in the definition would be proposed after it had completed its Thermo project, and now faces severe financial penalties if the rule is applied retroactively. Such a retroactive application would not only be unfair, but would violate Raser's due process rights under applicable law.

Conclusion

For all these reasons, Raser recommends that WREGIS not adopt the new definition, and retain the existing definition of "Station Service."

Nick Goodman

Raser Technologies

8/15/2011

PG&E has concerns with the proposed modifications to the definition of "Station Service." These modifications (e.g., the inclusion of "electrically driven fuel delivery") appear to expand the scope of the Station Service definition -- and therefore the exclusion -- beyond the CEC's original definition.

The CEC and other state regulatory agencies are the appropriate entities to interpret laws and develop policies regarding eligibility and compliance in accordance with the states' renewable portfolio standards. WREGIS's role is to administer the tracking system and develop rules to implement those interpretations and policies. Expanding upon the CEC's interpretation would exceed WREGIS's authority under its charter.

To ensure that the WREGIS rules are consistent with state RPS requirements, PG&E recommends that WREGIS seek guidance from the CEC and other regulatory agencies in the WECC prior to expanding the definition of Station Service. Absent a conclusive showing from these various jurisdictions, WREGIS should create RECs based upon the clear and unambiguous scope of the current definition of Station Service.

Bill Reinwald

Pacific Gas & Electric Company

8/15/2011

Seattle City Light is a municipal public utility that purchases WREGIS Certificates from wind, biogas and biomass resources for meeting Washington State's renewable portfolio standard (RPS).

The revised Operating Rules, Section 9.6 On-Site Load, Station Service and Off-Grid Generation needs further clarification.

On the one hand, paragraph 1 states that, in effect, WREGIS Certificates may be created for renewable energy production service to on-site load, such as Station Service. In contrast, a newly added paragraph indicates that "WREGIS Certificates will not be created for generation supplying Station Service ... regardless of whether such electricity or Station Service is self-provided ...".

Seattle City Light supports the creation of WREGIS Certificates from generation supplying station service, which we believe qualify under Washington's RPS.

Seattle City Light cannot support the proposed changes and requests further consideration and clarification of these issues consistent with Washington state law.

Gedion Haile

Seattle City Light

8/15/2011

We have reviewed the proposed changes to the definition of Station Service and are concerned that the inclusion of the words "electrically driven fuel production" would discourage the electrification of diesel driven pumps, conveyor drives and processing equipment used in solid fuelled renewable power plants such as RDF, biomass and biofuels. This would be counterproductive with respect to other agencies' goals of improving air quality and reducing particulate emissions, particularly here in the San Joaquin valley. We would favor retaining the current Station Service definition.

Steve Ketler, PE

Liberty Energy Resources Inc.

8/15/2011

Phoenix Energy develops and operates small CHP biomass gasification plants under 3MW for distributed generation and selling direct to the grid. Currently our primary market is California. California has a well-established biomass fuel's procession network drawing from specified urban, agricultural and forestry biomass. Easily 95% of fuel generated for CA's biomass plants ranging from .5MW to 50MW comes from the use of 400hp - 1200hp diesel grinders.

The statewide California Air Resources Board, (CARB), and local air district strongly support and encourage the conversion of stationary grinding operations, or those that could become stationary, to convert from diesel grinders to electric grinders for obvious reason especially in the highly polluted central valley of CA and the urban areas of the LA Basin and San Francisco Bay Area.

The new Station Service rule proposed by WREGIS is counter intuitive. It will penalize biomass plants from purchasing and consuming biomass fuel processed by electric grinders; grinders that now or in the future could use renewable biomass power generation. The new Station Service rule will not penalize a plant's REC allotment for fueled generated by a non-renewable energy source; diesel grinders. This new rule will give an advantage and encourage the continued use of diesel vs. renewable electric. Biomass operators will now need to consider these penalties and likely make the justifiable business decision to receive the most REC's allotted by WREGIS through using biomass fuel generated by diesel and not the power they are generating, renewable electric.

Phoenix Energy wants to support and encourage those industries currently using electricity over diesel, or can and are willing to convert from non-renewable to renewable power consumption. WREGIS should not take the opposite approach by adopting the proposed new Station Service definition.

Paul Elias

Phoenix Energy

08/15/2011

[Below] are Broadrock's comments to the proposed clarification of the definition of Station Service. Copies of the rulings by RI, MA and CT as referenced in the comments are available on request.

Please accept these comments of Broadrock Renewables, LLC ("Broadrock") with respect to the proposed clarification of "Station Service" as defined in Section 9.6 of the WREGIS Operating Rules.

Broadrock, a developer, owner and operator of clean energy projects specializing in technologies such as landfill gas, is currently constructing a landfill gas-to-energy generating plant at Olinda Alpha Landfill in Orange County, California (approximately 32.5 MW gross). The plant is contracted to sell the net output of the facility (approximately 28 MW) to the City of Anaheim for compliance with the California Renewables Portfolio Standard (RPS). We believe the new proposed definition is unduly broad and may potentially encompass categories of activities that are not truly "station service" as described below.

A portion of the gross output of the new plant (approximately 1 MW) will be utilized for true power plant station service, including pumps, fans, motor controls and other balance of plant functions. However, a portion of the gross output of the

new plant (approximately 3.5 MW) will be used for the collection, pretreatment and compression of the landfill gas at a nearby facility ("Gas Processing Facility"). As illustrated on the diagram attached, the gas collected, pretreated and compressed at the Gas Processing Facility will be used, not only by the new power plant, but also by a nearby existing power plant and by three existing landfill gas flares.

Broadrock is concerned that the proposed definition of "station service" could be construed to include the electricity consumed by the Gas Processing Facility because some of these activities could be characterized as "fuel delivery".

Broadrock believes that this usage should be excluded from the definition, and therefore should qualify for renewable energy credits. The following are some of the arguments for this position:

The collection and destruction of landfill gas is required by federal and state law. This can be accomplished by (i) flaring, (ii) processing (e.g. conversion to pipeline quality gas) or (iii) combustion in an engine or turbine for electricity generation. Even in the absence of electrical generation, many of the activities at the Gas Process Plant would be required for flaring and virtually all of the activities would be required for processing. Accordingly the activities of the Gas Processing Plant should be characterized as "additional" or "independent" of the generation of the electricity at the new power plant.

If, instead of using the landfill gas to generate electricity at nearby generating facilities, the landfill gas were used to create pipeline quality gas which was then shipped to one or more remote natural gas-fueled electricity generating facilities, the load associated with the Gas Processing Facility would not be treated as "station service" of the remote generating facilities. There is no basis for discriminating against the Gas Processing Facility simply because it elects to use the gas at nearby generating facilities.

If, instead of utilizing electric-driven compressors, Broadrock were to have selected natural gas-driven compressors, the gross electricity output of the new electricity generating facility as measured by the GIS would be increased proportionately, and all of the net output would be treated as renewable energy. There is no basis for discriminating against the Gas Processing Facility because it elects to use electric, rather than natural gas-driven compressors.

Compression of ordinary natural gas at pipeline compressor stations has never been included as "station service" or "parasitic load" of an ordinary natural gas plant. There is no basis for treating landfill gas differently.

The power required by the Gas Processing Facility could otherwise be supplied by a retail electricity grid connection, rather than by the electricity produced by the new generating plant. This would have the effect of increasing the new output through the GIS meter, all of which would be treated as renewable energy. There is no basis for discriminating against the Gas Processing Facility because it elects to self-supply.

The Gas Processing Facility's load will be separately metered and reported to GIS and will exclude the true power plant station service load. Therefore, there is no risk that the balance of plant and other true electric generation station service would be eligible for renewable energy credits.

There is ample precedent in other states for excluding the Gas Processing Facility's load from the definition of "station service." Broadrock is constructing a virtually identical power plant and gas processing facility in Rhode Island and the states of Rhode Island, Massachusetts and Connecticut have all recognized that the self-supplied gas processing facility electricity load should be excluded from the definition of "station service" and therefore should give rise to the production of renewable energy credits. There is no reason that California should reach a different result than all of the other states that have considered this issue.

We would recommend a minor modification to the proposed language to more clearly specify that the parasitic load does not include the collection, treatment and compression of biogas. We propose the following modification to the definition:

Station Service: The electric supply for the ancillary equipment used to operate a generating station or substation while it is generating electricity. Also called "Parasitic Load," it is the load that contributes to the process of electricity production; it is the power that is consumed by the Generating Unit as part of its normal operation, including any electrically driven fuel delivery, *but not including any fuel collection, treatment and compression of biogas*, while the Generating Unit is generating electricity.

Thank you for your consideration of our position. We would welcome a discussion with WREGIS staff regarding this issue to ensure a mutually agreeable disposition of this matter.

Thank you for your consideration.

Stephen Galowitz

Broadrock Renewables LLC

8/15/2011

Kiara Solar is not in favor of this change.

1. We have an existing PPA agreement, and this change in definition will retroactively change the number of RECs we can supply to our customer. At a minimum this change should exempt existing agreements.

2. This will create an additional clerical burden for our staff, in that they will now have to gather information on our lumber mill partners' use of power and factor that into our WREGIS reporting.

Lew Rubin

Kiara Solar

8/12/2011

I would like to add a sentence in Section 9.6 that states that the requirement to register multiple meters to measure the on-site load is not applicable to customer-sited generation.

Also, we have several instances where two wind farms, owned by different counterparties connect and are measured in aggregated at the same interconnection point, but were built at two separate times. Once the new wind farm was energized, there were several hours when the new wind farm was not generating and consuming house power while the first wind farm was generating. Therefore, the existing wind farm is sourcing the new wind farm with house power while the new wind farm is not generating and the measured generation amount at the interconnection point is less than it should be. How can we account for this within this revised definition of station service?

	Generation	House Power Consumption
Existing Windfarm	100	0
New Windfarm	0	10
Total from Submeters (with losses)	100	10
Metered at Interconnection Point	90	0

Thank you.

Kari Chilcott Clark

Xcel Energy

8/12/2011

Having read and considered the proposed changes to WREGIS Operating Rule 9.6, Geysers Power Company offers the following comments:

Geysers Power Company (GPC) is not certain that the proposed changes "clarify" what constitutes Station Service. We note that many agencies including the Federal Energy Regulatory Commission, state energy and public utility commissions, and electric industry groups have defined or issued decisions regarding Station Service (aka Parasitic Load or House Power) which are similar but not completely in agreement, and the proposed language is yet-another definition rather than a definitive one.

With many differing designs and technologies of (renewable) power plants throughout the WECC it is doubtful that a broad Station Service definition will ever bring true clarity to this subject. GPC actually finds the proposed language somewhat confusing as the definition of Station Service takes a 'while a unit is generating electricity' context while the new paragraph four in Section 9.6 takes a 'while a unit is not generating' perspective. To some degree this implies that what constitutes Station Power is dependent on whether a generator is paralleled to the grid.

Finally, GPC's view is that it should be the Program Administrators who determine whether generation through a meter at a generating resource qualifies as "renewable" under that Program's guidelines, and we are concerned that the proposed language implies that WREGIS's criteria is different and possibly more restrictive than that of our Program Administrator.

Consequently, GPC favors retaining the existing language.

Dean Cooley

Geysers Power Company

8/11/2011

WREGIS Staff is requesting further comment for Clarification of Station Service as defined in the WREGIS Operating Rules, and has proposed language on their website. If this proposed change is allowed to be made:

1. It creates significant concerns regarding the netting of electrical usage beyond station service.
2. It also establishes a precedent in which WREGIS now becomes a rule making entity.

Therefore, we believe that:

1. This proposed change should not be made.
2. Rule making is best left to State Legislative bodies, Public Service Commissions, or FERC.

Thank you.

Halley Dickey

TAS Energy

7/27/2011

The language used in the "[Station Service-Section 9.6 WREGIS Operating Rules](#)" is difficult to understand. We've had two graduate level employees and our senior electrician review the language and we are still seeking clarity and understanding. Does the language simply say that if we can pull off the separate metering either by direct metering or certified "netting," then, so long as we are generating, we can get RECs for all our station load? The language "[WREGIS Certificates may be created for any renewable energy production serving a load that would have been served by the grid if not for the generator \(on-site load\)](#)" seems to argue for inclusion, not exclusion, provided everything is metered separately and the QRE meets the associated requirements. And then there is the following introductory modifying clause that also seems to say yes: "[In order for on-site load to contribute to Certificates...](#)"

What are we missing?

Jer Camarata

Farmer's Irrigation District