

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

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

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

**COMMENTS OF THE INDEPENDENT ENERGY PRODUCERS
ASSOCIATION ON THE PROPOSED DECISION SETTING
PROCUREMENT QUANTITY REQUIREMENTS**

**INDEPENDENT ENERGY PRODUCERS
ASSOCIATION**

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Attorneys for the Independent Energy Producers
Association

Dated: November 17, 2011

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The Proposed Decision (PD) of Administrative Law Judge Anne Simon on the procurement quantity requirements adopts a logical set of procurement requirements based on the provisions of Public Utilities Code section 399.15(b), enacted as part of Senate Bill 2 of the First Extraordinary Session. The PD reaches the same conclusions expressed in the comments of the Independent Energy Producers Association (IEP) filed on August 30, 2011, and IEP agrees with the determinations of the PD on the procurement quantity requirements.

IEP spotted one typographic error. On page 4 of the PD is a reference to comments that were filed on August 20, 2011. August 20 was a Saturday, and comments were in fact filed on August 30, 2011.

With that correction, IEP respectfully urges the Commission to approve the PD without significant modification.

Respectfully submitted this 17th day of November, 2011 at San Francisco, California

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By /s/ Brian T. Cragg

Brian T. Cragg

Attorneys for the Independent Energy
Producers Association

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VERIFICATION

I am the attorney for the Independent Energy Producers Association in this matter. IEP is absent from the City and County of San Francisco, where my office is located, and under Rule 1.11(d) of the Commission's Rules of Practice and Procedure, I am submitting this verification on behalf of IEP for that reason. I have read the attached "Comments of the Independent Energy Producers Association on the Proposed Decision Setting Procurement Quantity Requirements," dated November 17, 2011. I am informed and believe, and on that ground allege, that the matters stated in this document are true.

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

Executed on this 17th day of November, 2011, at San Francisco, California.

/s/ Brian T. Cragg

Brian T. Cragg