

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

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

**R. 11-05-005**  
(Filed May 5, 2011)

**REPLY COMMENTS OF SIERRA CLUB CALIFORNIA ON THE PROPOSED  
DECISION ON PROCUREMENT QUANTITY REQUIREMENTS**

November 22, 2011 Jim Metropulos, Senior Advocate

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## I. INTRODUCTION

Pursuant to Rules 14.3 and 14.6 of the Commission's Rules of Practice and Procedure, Sierra Club California respectfully submits the following Reply Comments on the Proposed Decision on Procurement Quantity Requirements. Sierra Club California is comprised of more than 150,000 members and ratepayers throughout California. Sierra Club California supports successful implementation of the Renewable Portfolio Standard for the earliest implementation of renewable energy goals, and strongly supports the Proposed Decision (PD).

Sierra Club California agrees with Union of Concerned Scientists, Green Power Institute, Alliance for Retail Energy Markets and Retail Energy Supply Association in supporting the PD's linear trend projection for determining quantity targets for years which the legislation does not specify the applicable target and supporting the PD's culmination of the annual procurement targets to determine compliance period obligations. This guides the ramp-up to 33 percent and is a pertinent part of the obligation for the multi-year compliance periods. This linear ramp-up helps the renewables industries maintain a steady and stable renewables market in an otherwise uncertain economic outlook, and provides early integration of renewable energy into the electric grid. This is also consistent with the statutory requirement to make "reasonable progress" in the intervening years of each compliance period.<sup>1</sup> The plain meaning of "progress" is "a forward or onward movement," supporting the use of a linear trajectory in each intervening year.<sup>2</sup> As UCS describes, both SCE and PG&E propose 2011 RPS Procurement Plans that are consistent with the PD's linear trend approach, and the IOU proposal to limit progress to 1% over the prior year would lower the overall procurement target.

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<sup>1</sup> Public Utilities Code Section 399.15(b)(2)(B).

<sup>2</sup> Merriam-Webster Dictionary, m-w.com.

The PD directs the Energy Division to update the RPS Compliance Spreadsheet to comply with the new law. Sierra Club California, like Green Power Institute, holds that this process should be accessible to the public. If the revised spreadsheet is not easily understood by the public, a public participation process, or accurate materials easily understood by the public should be required.

The PD only addresses the procurement quantities portion of ALJ Simon's July 15, 2011 Ruling, which also requested comment on enforcement mechanisms. Sierra Club California urged in its Comments on the ALJ's Ruling that strong enforcement is necessary to enforce the RPS, and like GPI respectfully requests that the Commission address enforcement mechanisms to ensure compliance in a future Decision.

/s/ Jim Metropulos  
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## VERIFICATION

I am the Senior Advocate with Sierra Club California and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in this pleading are true.

I declare under penalty of perjury that the matters stated in this pleading are true and correct.

Executed on the **22nd day of November, 2011**, at Sacramento, California.

/s/ Jim Metropulos

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