

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
(Filed May 5, 2011)

NOTICE OF EX PARTE COMMUNICATION

Tam Hunt
Attorney for:
Clean Coalition
16 Palm Ct
Menlo Park, CA 94025
(805) 705-1352

February 6, 2012

NOTICE OF EX PARTE COMMUNICATION

Pursuant to Rule 8.3 of the Commission's Rules of Practice and Procedure, the Clean Coalition hereby gives notice of the following *ex parte* communication. On February 2, 2012, Ted Ko, Associate Executive Director of the Clean Coalition, met with Sara Kamins, energy advisor to Commissioner Ferron, in person, for approximately 30 minutes.

In the meeting, Mr. Ko provided background information and expressed the Clean Coalition's positions on four active matters within Commissioner Ferron's purview.

- Implementation of SB 32: Mr. Ko expressed the need to ensure that the pricing methodology in SB 32 included full consideration of locational benefits, including avoided transmission grid costs that were left out of the E3 analysis. He provided that rationale for using the current Transmission Access Charge (TAC) rates as a reasonable proxy for those costs.
- Proposed Decision on AB 1954 cost-recovery: Mr. Ko expressed that the Proposed Decision was too vague in the determination of whether a transmission project was likely needed to meet the state's RPS goals and stated that the burden is on the utility requesting cost recovery for transmission planning expenses to show that alternatives to transmission were fully considered, consistent with FERC Order 1000
- Proposed Decision to transfer 250 MW of SCE SPVP to the RAM: Mr. Ko reiterated the position from comments that SCE had not adequately proven the cost savings that justify the extreme program change. He also expressed that because there is no assurance that 1-2 MW wholesale DG projects would succeed in the RAM or SB 32, the Proposed Decision is drastically damaging the market segment that the original PUC Decision on SPVP purported to be targeting to support.
- SCE Petition for Modification of D10-12-048: Mr. Ko reiterated the Clean Coalition support for the RAM Decision to remain as is with respect to publishing grid information on maps. SCE's claims regarding CII do not legally apply in this instance and the energy security concerns were not convincingly presented.

Mr. Ko also provided the attached Brief as well as the attached slides as additional background information.

Respectfully submitted,

TAM HUNT

A handwritten signature in black ink, appearing to read 'TH', with a long horizontal flourish extending to the right.

Attorney for:
Clean Coalition
2 Palo Alto Square
3000 El Camino Real, Suite 500
Palo Alto, CA 94306
(805) 705-1352

Dated: February 6, 2012