

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

**Order Instituting Rulemaking to)
Continue Implementation and) Rulemaking 11-05-005
Administration of California) (Filed May 5, 2011)
Renewables Portfolio Standard)
Program)**

**COMMENTS OF ALLCO RENEWABLE ENERGY LIMITED IN SUPPORT OF THE
PETITION OF THE SOLAR ENERGY INDUSTRIES ASSOCIATION FOR
MODIFICATION OF D.13-05-034**

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December 5, 2013

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OF THE STATE OF CALIFORNIA**

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Allco Renewable Energy Limited files these comments in support of the Petition of the Solar Energy Industries Association (“SEIA”) for Modification of D. 13-05-034 dated November 15, 2013 (the “SEIA Petition”). There are many reasons why full and complete disclosure of all information is appropriate. On the other hand, there is no reasonable justification (from either a policy or business perspective) for any of the IOUs to operate their program in secrecy. But that is exactly what is being done. Moreover, the lack of full and complete disclosure interferes with the operation of the Re-MAT program.

First, the interference with the operation of the program is easily illustrated by the lack of disclosure in an energy category when less than 5 applicants are in a category. The only information disclosed is merely that less than 5 applicants were in that category. For example, in the case of SDG&E, there is 9.5MW overall in each category and 3MW for a bi-monthly period. If there were four 3.0MW projects submitted in a category that would eliminate the capacity in that category for the entire program. On the other hand, if no projects were submitted in a category, there would be no way for a developer to know whether there was any capacity remaining for a project that might be developed. If there were capacity remaining in a category

presumably it would be useful for a developer to know that so a rationale business decision could be made as to whether a developer should invest the cost and time to develop a project that could be submitted to that category. The absence of full information interferes with the Legislature's goal of California Public Utilities Code Section 399.20, which is to have 750MW of certain renewable resources built statewide.

Second, as SEIA stated in the SEIA Petition, interested generators that have already submitted a project and that are in the queue must continue to incur significant development costs just to maintain the status of a project in the queue. The minimal information provided by the IOUs with respect to their respective queues does not allow any developer the ability to reasonably assess whether those costs should be continued to be incurred to stay in the queue.

Third, with respect to each type of energy bucket, it is important for the integrity of the program for all interested parties to see all relevant information. For example, it is important for interested parties to know whether the price adjustment mechanisms are operating properly, and are furthering the goals of the statute.

Full and complete disclosure of all information related to projects submitted, projects in the queue and capacity availability are necessary for the proper implementation of the Re-MAT program. As a result, Allco supports the SEIA Petition and urges the Commission to have the IOUs provide full and complete disclosure as soon as possible.

Respectfully submitted,

/s/ Thomas Melone

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VERIFICATION

I, Thomas Melone, am the President of Allco Renewable Energy Limited and am authorized to make this verification on its behalf. I have read the foregoing *COMMENTS OF ALLCO RENEWABLE ENERGY LIMITED IN SUPPORT OF THE PETITION OF THE SOLAR ENERGY INDUSTRIES ASSOCIATION FOR MODIFICATION OF D.13 -05-034*. The statements in the foregoing document are true based upon my knowledge. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of December 2013 at New York, NY.

/s/ Thomas Melone

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