

**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 08-08-009
(Filed August 21, 2008)

**COMMENTS OF THE CALIFORNIA WIND ENERGY
ASSOCIATION AND THE LARGE-SCALE SOLAR ASSOCIATION
ON THE SAN DIEGO GAS & ELECTRIC COMPANY AND PACIFIC
GAS AND ELECTRIC COMPANY FURTHER AMENDED DRAFT
2010 RENEWABLE PROCUREMENT PLANS**

Joseph M. Karp
Thomas W. Solomon
Winston & Strawn LLP
101 California Street, 39th Floor
San Francisco, California 94111-5894
Telephone: (415) 591-1000
Facsimile: (415) 591-1400
Email: jkarp@winston.com
tsolomon@winston.com

April 23, 2010

*Attorneys for the California Wind Energy Association
and the Large-scale Solar Association*

**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 08-08-009
(Filed August 21, 2008)

**COMMENTS OF THE CALIFORNIA WIND ENERGY
ASSOCIATION AND THE LARGE-SCALE SOLAR ASSOCIATION
ON THE SAN DIEGO GAS & ELECTRIC COMPANY AND PACIFIC
GAS AND ELECTRIC COMPANY FURTHER AMENDED DRAFT
2010 RENEWABLE PROCUREMENT PLANS**

Pursuant to the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure and the *Administrative Law Judge's Ruling* issued on March 19, 2010 in this proceeding, the California Wind Energy Association ("CalWEA") and the Large-scale Solar Association ("LSA") respectfully submit these comments on Pacific Gas and Electric Company's ("PG&E") motion for updates to its 2010 RPS procurement plan (the "PG&E Motion") and San Diego Gas & Electric Company's ("SDG&E") further amended draft 2010 renewable procurement plan.

On January 19, 2010, CalWEA and LSA filed comments in this proceeding on the draft 2010 renewables portfolio standard ("RPS") procurement plans submitted by PG&E and SDG&E ("Opening Comments"). On March 4, 2010, CalWEA and LSA also filed a response in this proceeding to PG&E's first motion for updates to its 2010 renewable energy procurement plan ("PG&E Response").

The amended RPS procurement plans filed by PG&E and SDG&E on April 9, 2010 do not resolve many of the issues raised by CalWEA and LSA in the Opening Comments and

PG&E Response. While PG&E did file a reply to the PG&E Response on March 15, 2010, in which PG&E agreed with many of the revisions proposed by CalWEA and LSA, PG&E's April 9, 2010, motion does not include revised language reflecting such agreement. Therefore, CalWEA and LSA reiterate the requests for relief set forth in the Opening Comments and the PG&E Response in connection with the amended RPS procurement plans filed by PG&E and SDG&E.

Respectfully submitted,



Joseph M. Karp
Thomas W. Solomon
Winston & Strawn LLP
101 California Street, 39th Floor
San Francisco, California 94111-5894
Telephone: (415) 591-1000
Facsimile: (415) 591-1400
Email: jkarp@winston.com
tsolomon@winston.com

April 23, 2010

***Attorneys for the California Wind Energy Association
and the Large-scale Solar Association***

VERIFICATION

I, Nancy Rader, am the Executive Director of the California Wind Energy Association. I am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing copy of *Comments of the California Wind Energy Association and the Large-scale Solar Association on the San Diego Gas & Electric Company and Pacific Gas and Electric Company Further Amended Draft 2010 Renewable Procurement Plans* are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters I believe them to be true.

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

Executed on April 23, 2010 at Berkeley, California.



Nancy Rader

Executive Director, California Wind Energy Association

VERIFICATION

I, Shannon Eddy, am the Executive Director of the Large-scale Solar Association. I am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing copy of *Comments of the California Wind Energy Association and the Large-scale Solar Association on the San Diego Gas & Electric Company and Pacific Gas and Electric Company Further Amended Draft 2010 Renewable Procurement Plans* are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters I believe them to be true.

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

Executed on April 23, 2010 at Sacramento, California.

/s/ Shannon Eddy

Shannon Eddy

Executive Director, Large-scale Solar Association

Certificate of Service

I hereby certify that I have this day served a copy of the

**COMMENTS OF THE CALIFORNIA WIND ENERGY
ASSOCIATION AND THE LARGE-SCALE SOLAR ASSOCIATION
ON THE SAN DIEGO GAS & ELECTRIC COMPANY AND PACIFIC
GAS AND ELECTRIC COMPANY FURTHER AMENDED DRAFT
2010 RENEWABLE PROCUREMENT PLANS**

on all known parties to R.08-08-009 by sending a copy via electronic mail and by mailing a properly addressed copy by first-class mail with postage prepaid to each party named in the official service list without an electronic mail address.

Executed on April 23, 2010, at San Francisco, California.

/s/ Marcus Hidalgo
Marcus Hidalgo