



## California Wind Energy Association

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April 11, 2017

The Honorable Kevin Mullin  
California State Assembly  
State Capitol  
Sacramento, CA 95814

RE: AB 1405 - Concern

Dear Assembly Member Mullin:

The California Wind Energy Association (CalWEA) is a 17-year-old trade association representing wind energy companies focused on the California market, including owners and operators of projects located in California. CalWEA has concerns regarding your Assembly Bill 1405, which would require the PUC to ensure that each load-serving entity procures a minimum percentage of electricity delivered during specified peak load times from eligible renewable energy resources or energy storage systems.

CalWEA agrees that the costs and greenhouse gases (GHGs) associated with serving net load are an increasing source of concern that deserve attention. However, we expect that the state energy agencies' implementation of the Integrated Resource Planning (IRP) requirements established in 2015 under SB 350 will address these issues and foster a resource mix that cost-effectively balances the resource portfolio so as to minimize the cost and GHGs associated with grid-integration services, including ramping requirements.

Adding the goal of minimizing the use of fossil fuels during particular periods of time will add a constraint on an already complex IRP process that could raise costs unless the bill specifies otherwise. In addition, the bill's definition of "peakload time period" ("a four-hour time period comprising the one hour prior to and two hours following the peak demand hour") should be made consistent with the concerns represented by the CAISO's "duck curve."

We would welcome the opportunity to discuss these issues with you.

Sincerely,

Nancy Rader  
Executive Director

cc: Members of the Assembly Committee on Energy and Utilities  
Members of the Assembly Committee on Natural Resources