



# California Wind Energy Association

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December 12, 2016

California Energy Commission  
Docket Office  
Re: Docket No. 16-OIR-03  
1516 Ninth Street  
Sacramento CA 95814

***Submitted Electronically to Docket 16-OIR-03***

**Re: 16-OIR-03 – Title 20 Data Collection Regulations – Comments on Proposed Language for Discussion at the November 16, 2016, Commissioner Workshop**

The California Wind Energy Association (CalWEA) offers the following comments on the document titled “Proposed Language for Discussion at the November 16, 2016, Commissioner Workshop” regarding Title 20 Data Collection Regulations. We focus specifically on the proposed regulatory language pertaining to the Section 1385 Information Requirements for Wind Project Operators.

In summary, CalWEA urges the Commission to abandon the proposed new requirements or, at a minimum, reconsider them after dialogue with wind project operators and wind energy experts. We agree with the October 17, 2016, comments of the Sacramento Municipal Utility District (SMUD) that the proposed changes “are not in all cases easily available, relevant on a going forward basis, or important for any policy purpose.”

Specifically, while a few of the proposed new reporting requirements, or proposed requirement modifications, do not present problems (e.g., items 5 and 23), most ask for information that is problematic for a variety of reasons. Some of the requested data is potentially confidential (e.g., items 25 and 26) or may be unavailable or not readily available and thus burdensome to collect (e.g., items 17, 18, 21, 22, 24, 25 and 26), particularly for 1980s-vintage projects. We elaborate on these concerns below.

More importantly, however, the Commission has not made clear how this information will be used to support any specific and worthy purpose, public policy or otherwise, nor is it obvious what such purpose would be. At the September 26, 2016, workshop, Commission staff stated, “With this new data, we plan to analyze the generation in more depth to better understand time variations in production, to better understand the generator equipment, and the sites, to evaluate productivity and efficiency in production, and to support other

State energy goals.”<sup>1</sup> Staff did not, however, provide any indication of what type of analyses would be performed or how the results (assuming meaningful analysis would be possible) might inform or support State energy goals. CalWEA can envision no such purpose.

We provide two examples to indicate the lack of meaningful purpose of the additional data proposed to be collected. First, during the September 26 workshop, Commissioner McAllister inquired whether the data would help to understand the important issue of energy curtailment. Staff responded that the data could be used “to infer curtailment by looking [at] when production is occurring, and when it’s not occurring. So, we can make certain conclusions about that. But we don’t specifically collect that type of data.”<sup>2</sup> Staff went on to confirm that the Commission could do “some analysis” on curtailment based on the data collected.<sup>3</sup> However, the data proposed to be collected cannot meaningfully inform curtailment issues, nor is any project-specific data collection necessary to do so. The proposed requirements request only general production data and no information regarding economic or reliability curtailment instructions pursuant to offtake agreements or the CAISO tariff. Nor would any such information requirements be necessary, since the CAISO already collects and reports retrospective curtailment data, for both wind and solar projects.<sup>4</sup> (The Commission’s proposed wind information requirements do not even extend to solar projects.) Similarly, CPUC studies have and will continue to evaluate prospective curtailment under various RPS scenarios and portfolios as part of its planning efforts.

As a second example, consider the extremely detailed information that is requested in items 21-27, such as “height above ground surface (in m) of the center of the blade hub for each turbine group...” and “statistical parameters which best characterize the wind speed distribution at the project site.” It is inconceivable how such information (even if it were available – see below) could meaningfully support the implementation of Senate Bill 350 (the intended purpose of the proposed regulations), such as promoting the repowering of aging turbines, or any other public policy purpose. Likewise, any analysis that might be produced would be unlikely to add to the project owner’s already detailed knowledge of its project and would, at best, be of marginal use.

### Comments Regarding Specific Proposed Wind Information Requirements

**Items 17 and 18** [*Quarterly or monthly production per turbine (kWh), depending on project capacity, and annual production per turbine (kWh)*] – This information (as well as the same

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<sup>1</sup> [“Transcript of the 09/26/2016 Staff Workshop on Title 20 Data Collection Regulations to Support New Analytical Needs,”](#) at p. 36.

<sup>2</sup> *Id* at p. 36-37.

<sup>3</sup> *Id* at p. 37.

<sup>4</sup> See, e.g., CAISO, “Wind and Solar Curtailment November 18, 2016,” available at [http://www.aiso.com/Documents/Wind\\_SolarReal-TimeDispatchCurtailmentReportNov18\\_2016.pdf](http://www.aiso.com/Documents/Wind_SolarReal-TimeDispatchCurtailmentReportNov18_2016.pdf).

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information on a projected basis under the current requirements), is extremely burdensome for project operators to collect, particularly for 1980s-vintage projects that can have over 200 wind turbines per project. Moreover, the kwh meters for many of these “legacy” wind turbines are no longer in service.

If these requirements are not eliminated altogether, at a minimum, they should be per Turbine Group and not per turbine, and projects under 10 MW should be exempt. A small-project exemption for this and other similar new requirements would parallel the Section 1304 Power Plant Reports at (a)(2) (A), which provides for annual (rather than more granular) data submissions for projects under 10 MW. Small wind project operators may need to hire outside consultants to fulfill more detailed information requests.

**Item 21** [*For each turbine group, whether turbine (yaw) direction is fixed in position or follows wind direction, and if fixed, direction it faces*] – While many projects can readily report yawing information by turbine group, for some 1980s-vintage projects, the yaw will vary by turbine even within a turbine group, as turbines become inoperable or are returned to operation.

**Item 22** [*For each turbine group, type of wind direction and wind speed sensors installed*] – Many legacy wind turbines are equipped with wind vanes and/or anemometers, however, each turbine model utilizes the sensors differently. On many legacy turbines, the data is utilized by the turbine to yaw, start, and stop, but it is not provided to the operator, so knowing the sensor type would not give the Commission any useful information. It is possible to access wind speed data from modern wind turbines that are connected to a SCADA system, but any data extraction would come at an added expense to the operator.

**Item 24** [*Elevation of the ground surface above sea level (in m) at the geographic center of each turbine group*] – This information could be provided, but it will not be informative for the many projects located in complex-terrain environments. Further, some projects do not have neatly defined groups of turbines, nor is there any standard method to determine the “geographic center” of such groups.

**Item 25** [*Average wind speed (in m/s) at the project site, along with the height above ground surface (in m) at which the speed is measured. The speed data shall be reported on the same time basis that the energy produced is reported*] – This information is highly confidential. Projects that report wind speed data to the CAISO do so with encryption. The CEC might be able to obtain generic information from the investor-owned utilities, which collect wind speed data from meteorological stations that they control throughout the wind resource areas of California. At a minimum, confidential treatment should be assured.

**Item 26** [*Statistical parameters which best characterize the wind speed distribution at the project site. For example, where the Weibull distribution fits the wind speeds at the site, the Weibull shape and scale parameters, along with the height where these apply, shall be stated. If the speed distribution parameters are not known, this shall be stated on the reporting form*] – The wind speed data from wind sites in California do not fit within a Weibull distribution. CalWEA members are not aware of any statistical distribution curves that comport with the wind speed conditions at California wind power plants. Consequently, projects are likely to

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report that the wind speed distribution parameters are unknown. Moreover, any available statistical parameters would be proprietary and confidential.

**Item 27** [*Qualitative type of surface (vegetative) cover at the project site and numeric value of the parameter quantifying the surface cover (for example, the roughness length). If the value for the roughness parameter is not known, this shall be stated on the reporting form, and the qualitative type shall be stated*] – Most project operators are likely to report that the roughness parameter is unknown.

Given the lack of stated purpose for collecting the wind data discussed above, and the various problems described above that would be associated with those information requirements, CalWEA respectfully requests that the proposed Section 1385 Information Requirements for Wind Project Operators be rejected. At a minimum, the need for this type of information should be clearly articulated and then discussed among a working group of wind project operators and wind energy experts.

Thank you for considering CalWEA's views.

Sincerely,

A handwritten signature in cursive script that reads "Nancy Rader".

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