

From: Allen, Meredith
Sent: 8/24/2010 3:09:42 PM
To: 'Baker, Amy C.' (amy.baker@cpuc.ca.gov)
Cc:
Bcc:
Subject: RE: A few PV program items

Hi Amy,

Attached is the redline of the PPA in response to question 3. It also includes a few clean up items.

We can discuss on tomorrow's call, if you have questions.

Thanks,
Meredith

From: Baker, Amy C. [mailto:amy.baker@cpuc.ca.gov]
Sent: Tuesday, August 24, 2010 9:41 AM
To: Allen, Meredith
Subject: A few PV program items

Hi Meredith,

I was hoping you could help me with a few items.

1. DRA protested PG&E's UOG advice letter (3691-E). DRA states that "PG&E should be required to agree to the same Resource Adequacy ("RA")-related requirements that it demands of its counterparties in the Power Purchase Agreement ("PPA") portion of the PV Program." PG&E responded stating: "PG&E believes that the requirement that it make reasonable efforts to secure any available value related to its PV UOG facilities for the benefit of its customers, including any future RA credit, is consistent with its normal business practices and is implicit in the Commission's approval of the PV Program."

If this is normal business practice, I'm guessing PG&E has written this down somewhere, for example in the LTPP? Would you mind providing me with a citation where PG&E stated something related to this topic (or Commission order)?

2. Republic Solar protested PG&E's PPA advice letter (3674-E) and states: "The Solicitation Protocols and form PPAs limit a project to a generation or generators located on the same or contiguous parcels with a single CAISO revenue meter and grid interconnection point." PG&E responds with "In allowing small PV facilities to be aggregated so long as they interconnect through a single meter, PG&E struck a balance between accommodating the reasonable need of facilities on multiple, contiguous parcels to qualify for the minimum 1 MW program size while ensuring that deliveries from the facilities, along with all terms and

conditions of the PPA, could be easily tracked and verified without substantial modifications to the form PPA that would defeat the intended streamlined approval process. I realize the Commission adopted this in the large PPA, but this is still up for discussion in the small PPA. I'd like to talk with someone at PG&E to better understand why PG&E thinks this limitation is necessary. At this point it isn't clear to me how hard it would be to track multiple facilities or why it would require substantial modifications to the PPA.

3. Could you provide me with a copy of the form PPA for 3-20 MW that includes redlines of the changes adopted by D.10-04-052 (ordering paragraph 18)?

4. Solar Alliance disagrees with some of PG&E's PPA protocols filed with AL 3674-E relating to the waiver of certain legal rights. PG&E states: "In reality, the PV PPA protocol strikes a reasonable balance between limiting the potential for paralyzing lawsuits while ensuring that any participant is free to challenge the conduct or the results of any particular PV PPA solicitation at the Commission." I'd like to get a better understanding of how PG&E sees the process for challenging the results of a solicitation working under the protocols filed in the advice letter.

Items 1 and 3 can be answered in a written response which I'd like by noon tomorrow.

Items 3 and 4 we'll probably want to set up a call for. Is it possible to set this up for tomorrow?

Thanks,

Amy

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