

**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 11-05-005  
(Filed May 5, 2011)

**MOTION FOR PARTY STATUS OF TENASKA SOLAR VENTURES**

Laurence G. Chaset  
KEYES, FOX & WIEDMAN, LLP  
436 14th Street, Suite 1305  
Oakland, CA 94612  
Phone: 510.314.8201  
Fax: 510.225.3848  
[lchaset@keyesandfox.com](mailto:lchaset@keyesandfox.com)

Counsel to Tenaska Solar Ventures

June 6, 2012

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**MOTION FOR PARTY STATUS OF TENASKA SOLAR VENTURES**

Tenaska Solar Ventures (Tenaska Solar) hereby moves to become a party in the above-captioned proceeding under Rules 1.4(a)(4) and (b) of the Commission's Rules of Practice and Procedure.

**I. TENASKA SOLAR'S INTEREST IN THIS PROCEEDING**

Tenaska Solar's interest in this proceeding is related to its existing and planned development of projects aimed at achieving the goals of California's Renewable Portfolio Standard (RPS). Tenaska Solar, an affiliate of Tenaska, Inc., is dedicated to developing, owning and operating solar projects in California and other parts of North America. Tenaska, Inc. is an independent energy company headquartered in Omaha, Nebraska, that has developed approximately 9,000 MW of generating capacity across the United States, including traditional generation facilities, combined heat and power plants and renewable energy projects. Tenaska, Inc.'s affiliates operate and manage eight power plants in six states totaling more than 6,700 MW of generating capacity, owned in partnership with other companies. The company also has extensive experience in the natural gas, biofuels and electric power markets. The Natural Resource Defense Council repeatedly lists Tenaska Inc.'s fleet as among the best for controlling emissions.

Tenaska Solar is developing two projects in California with Tenaska, Inc.'s affiliates CSOLAR IV South, LLC, and CSOLAR IV West, LLC (Tenaska South and Tenaska West, respectively). Tenaska South is a 130 MW solar photovoltaic (PV) project located near El Centro, CA that has executed a 25-year power purchase agreement (PPA) with San Diego Gas & Electric Company (SDG&E). The Commission approved the Tenaska South PPA on July 28, 2011.<sup>1</sup> Construction has begun on the project with a commercial on-line date set for January 1, 2014.<sup>2</sup> Tenaska West is a 150 MW PV project also located near El Centro, CA that has also executed a 25-year PPA with SDG&E. The Commission approved the Tenaska West PPA on December 15, 2011.<sup>3</sup> Construction is expected to begin on the Tenaska West project in late 2012, with a commercial on-line date set for December 31, 2015.<sup>4</sup>

## **II. THE FACTUAL AND LEGAL CONTENTIONS THAT TENASKA SOLAR INTENDS TO MAKE IN THIS PROCEEDING ARE PERTINENT TO THE ISSUES ALREADY PRESENTED**

This proceeding's Order Instituting Rulemaking,<sup>5</sup> Scoping Ruling,<sup>6</sup> and recent Assigned Commissioner's Ruling<sup>7</sup> all include the consideration of proposed modifications and revisions to the RPS procurement rules. Tenaska Solar's track record in developing projects that achieve California's RPS goals, and its affiliate's in-depth experience in developing, owning and

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<sup>1</sup> Resolution E-4408 (July 28, 2011).

<sup>2</sup> *Id.*

<sup>3</sup> Resolution E-4446 (December 15, 2011).

<sup>4</sup> *Id.*

<sup>5</sup> Order Instituting Rulemaking 11-05-005 (May 5, 2011).

<sup>6</sup> ~~Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge, R.11-05-005 (July 8, 2011).~~

<sup>5</sup> Order Instituting Rulemaking 11-05-005 (May 5, 2011).

<sup>6</sup> Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge, R.11-05-005 (July 8, 2011).

<sup>7</sup> Assigned Commissioner's Ruling Identifying Issues and Schedule of Review for 2012 Renewable Portfolio Standard Procurement Plans Pursuant to Public Utilities Code Sections 399.11 Et Seq. and Requesting Comments on New Proposals, R.11-05-005 (April 5, 2012).

maintaining independently owned generating assets, make it a valuable participant in this proceeding. Tenaska Solar has the expertise to offer credible and well-developed commentary on any proposed modifications and revisions to the RPS procurement rules. Its goal in this proceeding is to ensure that those rules maintain a successful balance between promoting viable projects, maintaining grid reliability, and providing cost-effective renewable energy for California's ratepayers.

### **III. SERVICE LIST**

Tenaska Solar respectfully requests that the Commission list Laurence G. Chaset as its representative in this matter, with the following information:

Laurence G. Chaset  
KEYES, FOX & WIEDMAN, LLP  
436 14th Street, Suite 1305  
Oakland, CA 94612  
510.314.8201 phone  
510.225.3848 fax  
[lchaset@keyesandfox.com](mailto:lchaset@keyesandfox.com)

### **IV. CONCLUSION**

The Commission should grant Tenaska Solar status as a party in this proceeding with all of the rights that attach thereto.

Respectfully submitted,



Laurence G. Chaset  
KEYES, FOX & WIEDMAN, LLP

Counsel to Tenaska Solar Ventures

June 6, 2012

## VERIFICATION

I am the attorney for Tenaska Solar Ventures (Tenaska Solar) in this matter. Tenaska Solar is absent from the County of Alameda, where my office is located, and under Rule 1.11(d) of the Commission's Rules of Practice and Procedure, I am submitting this verification on behalf of Tenaska Solar for that reason. I have read the attached **MOTION FOR PARTY STATUS OF TENASKA SOLAR VENTURES**. I am informed and believe, and on that ground allege, that the matters stated in this document are true.

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

Executed this 6th day of June, 2012, at Oakland, California.



Laurence G. Chaset  
KEYES, FOX & WIEDMAN LLP  
436 14th Street, Suite 1305  
Oakland, CA 94612  
Telephone: (510) 314-8385  
E-mail: lchaset@keyesandfox.com