

**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)

**NOTICE OF EX PARTE COMMUNICATION BY THE LARGE-SCALE
SOLAR ASSOCIATION**

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December 5, 2012

NOTICE OF EX PARTE COMMUNICATION BY THE LARGE-SCALE SOLAR ASSOCIATION

Pursuant to Rule 8.4 of the Commission's Rules of Practice and Procedure, the Large-scale Solar Association (LSA) respectfully reports the following *ex parte* communications.

The meetings took place on December 3, 2012 at the Commission's offices at 505 Van Ness Avenue, San Francisco, California. The meetings were scheduled at LSA's request. All communications were oral and no written materials were provided.

At 2:30pm Rachel Gold, Policy Director met with Matthew Tisdale, Advisor to Commissioner Michel Peter Florio for approximately 30 minutes. The conversation focused on the Second Assigned Commissioner's Ruling Issuing Procurement Reform Proposals for the Renewables Portfolio Standard Program. Ms. Gold discussed concerns with both the lack of regular and predictable procurement opportunities and with recommendations made by environmental groups to incorporate environmental standards of review in the procurement process. Ms. Gold recommended the Commission focus on its mandate and avoid improper litigation of environmental matters.

At 3:00 pm Ms. Gold met with Sara Kamins and Michael Colvin, Advisors to Commissioner Mark J. Ferron for approximately 30 minutes. The conversation focused on the Second Assigned Commissioner's Ruling Issuing Procurement Reform Proposals for the Renewables Portfolio Standard Program. Ms. Gold discussed concerns with both the lack of regular and predictable procurement opportunities and with recommendations made by environmental groups to incorporate environmental standards of review in the procurement process. Ms. Gold recommended the Commission focus on its mandate and

avoid improper litigation of environmental matters. Ms. Gold also discussed specific concerns with regards to the standards of review (SOR) for expedited, amended and non-standard contracts. Ms Gold recommended that the Commission, in any expedited process, allow for sufficient flexibility in the pro forma to ensure the resulting process is used and useful. Ms. Gold also recommended carefully define terms for the SOR for amended and non-standard contracts and cautioned that setting up an Application process for emerging technologies may stifle innovation.

To request a copy of this notice, please contact the undersigned by email or telephone.

Dated: December 5, 2012

Respectfully submitted,

/s/Rachel Gold
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