

Joff Morales Regulatory Affairs 8330 Century Park Court San Diego, CA 92123-1548 Tel: 858-650-4098 Fax: 858-654-1879 JMorales@semprautilities.com

June 25, 2013

CPUC Energy Division Attention: Tariff Unit 505 Van Ness Avenue, Room 4005 San Francisco, CA 94102

Re: Substitute Sheet for San Diego Gas & Electric Advice Letter 2483-E, Request for Approval of Bundled Energy Sales with Exelon Generation Company, Pilot Power Group, Inc and Noble America's Energy Solutions LLC

Please find enclosed the original and four copies of page 2, 3 and 4 of San Diego Gas & Electric (SDG&E) Advice Letter (AL) 2483-E submitted on May 29, 2013.

On June 18, 2013, a response to the AL was filed by Independent Energy Producers Association (IEP) whereby IEP points out that the list set forth in AL 2483-E of projects from which SDG&E may draw for the requested sales appears to include projects that may be subject to restrictions on transfer of renewable energy credits (RECs).

A reply to IEP was concurrently filed with this Substitute Sheet letter noting that SDG&E would correct the error. SDG&E hereby replaces the table found on pages 2, 3 and 4 with the table below:

Name of Facility	Resource	Location	CEC RPS ID	Host Balancing Authority
AES Delano Inc	Biomass	Delano, CA	60431A	CAISO
AES Mt Signal 1 Solar	Solar PV	Imperial Valley, CA		CAISO
Arlington	Solar PV	Hassayampa, AZ		CAISO
Blue Lake Power, LLC	Biomass	Blue Lake, CA	60690A	CAISO
Borrego PV Solar I	Solar PV	Borrego Springs, CA	61211C	CAISO
Calpine Geysers	Geothermal	Sonoma & Lake County, CA	60002A	CAISO
			60003A	CAISO
			60004A	CAISO
			60005A	CAISO
			60006A	CAISO
			60007A	CAISO
			60008A	CAISO
			60009A	CAISO
			60012D	CAISO

			60013D	CAISO
			60014C	CAISO
			60015C	CAISO
			60016C	CAISO
Gestamp Calipatria	Solar PV	Calipatria, CA		CAISO
Manzana Wind	Wind	Tehachapi, CA	61671C	CAISO
Mesa Wind Farm	Wind	Riverside County, CA	60370A	CAISO
MM Prima Deshecha Energy, LLC	Biogas	San Juan Capistrano, CA	60552A	CAISO
MM San Diego - Miramar	Biogas	San Diego, CA	60481A	CAISO
MMR Campo Verde	Solar PV	Imperial Valley		CAISO
Mushroom Power - CRE (FIT)	Biomass	San Diego,CA		CAISO
Ocotillo Wind Energy Facility	Wind	Imperial Valley, CA	61400C	CAISO
Otay Landfill I	Biogas	Chula Vista, CA	60433E	CAISO
Otay Landfill II	Biogas	Chula Vista, CA	60434E	CAISO
Otay Landfill V - CRE (FIT)	Landfill gas	San Diego,CA		CAISO
Otay Landfill VI - CRE (FIT)	Landfill gas	San Diego,CA		CAISO
Pacific Wind, LLC	Wind	Tehachapi, CA	61555C	CAISO
Phoenix West	Wind	Riverside County, CA	60445A	CAISO
RAM (To be added)	Solar PV	Various in SD County		CAISO
Regenerate Seville	Solar PV	El Centro, CA		CAISO
Rugraw Lassen Lodge Hydro	Small Hydro	Lassen, CA		CAISO
San Marcos Landfill	Biogas	San Marcos, CA	60435A	CAISO
SDG&E SEP (UOG)	Solar PV	Various in SD County		CAISO
SDG&E Sustainable	Solar PV	Various in SD County	Various	CAISO
Soitec Desert Green	Solar PV	Borrego Springs, CA		CAISO
Soitec Eastland	Solar PV	Boulevard, CA		CAISO
Soitec Rugged	Solar PV	Boulevard, CA		CAISO
Soitec TDS	Solar PV	Boulevard, CA		CAISO
Soitec Westland	Solar PV	Boulevard, CA		CAISO
Sol Orchard	Solar PV	San Diego County, CA (distributed)		CAISO
Solargen2	Solar PV	Imperial Valley, CA		CAISO
SunEdison Cascade	Solar PV	SunFair , CA		CAISO
Tenaska South	Solar PV	Calexico, CA		CAISO
Tenaska West	Solar PV	Imperial Valley, CA		CAISO
Victor Mesa Linda B	Solar PV	Victorville, CA		CAISO
Western Antelope Dry Ranch	Solar PV	Lancaster, CA		CAISO
Zodiac Power Solar A - CRE (FIT)	Solar PV	Potrero, CA		CAISO

Zodiac Solar E - CRE (FIT)	Solar PV	Potrero, CA		CAISO
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An asterisk has been reflected in the upper right corner of the pages referenced above.

The attached substitute sheets are being served to interested parties in R.11-05-005.

Sincerely

Joff Morales Rates, Regulations & Tariffs

(cc list enclosed)

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a twenty-four (24) month term and involves delivery from a list of wind, solar, biomass, biogas and/or geothermal operating California facilities. All of the facilities listed in the Proposed Agreement have been previously included in CPUC-approved SDG&E Advice Letters and are in SDG&E's current RPS Portfolio. The Noble Proposed Agreement establishes a firm initial delivery date of January 1, 2014.

This transaction will help facilitate SDG&E's satisfaction of its procurement requirement under California's Renewable Portfolio Standard ("RPS") program, especially in Compliance Period 2, at lower costs to its ratepayers as it optimizes value across compliance categories SDG&E has entered into these agreements on reasonable terms, as set forth in more detail below. The revenues, net of costs, from this transaction will be credited to SDG&E's customers via SDG&E's Energy Resource Recovery Account, helping to reduce overall procurement costs as well as the costs of the Renewables Portfolio Standard ("RPS") program. As set forth in greater detail in Part 2 of this Advice Letter, the Proposed Agreements provide greater value to SDG&E's customers than other options available to SDG&E in optimizing its RPS portfolio.

B. <u>SUBJECT OF THE ADVICE LETTER</u>

1. <u>PROJECT NAME</u>: Various projects certified by the California Energy Commission ("CEC") that are part of SDG&E's portfolio as being RPS-eligible located throughout California ("Projects") as follows:

Name of Facility	Resource	Location	CEC RPS ID	Host Balancing Authority
AES Delano Inc	Biomass	Delano, CA	60431A	CAISO
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Arlington	Solar PV	Hassayampa, AZ		CAISO
Blue Lake Power, LLC	Biomass	Blue Lake, CA	60690A	CAISO
Borrego PV Solar I	Solar PV	Borrego Springs, CA	61211C	CAISO
Calpine Geysers	Geothermal	Sonoma & Lake County,	60002A	CAISO
		CA	60003A	CAISO
			60004A	CAISO
			60005A	CAISO
			60006A	CAISO
			60007A	CAISO
			60008A	CAISO
			60009A	CAISO
			60012D	CAISO
			60013D	CAISO

Sales to Exelon, Pilot & Noble:

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			60014C	CAISO
			60015C	CAISO
			60016C	CAISO
Gestamp Calipatria	Solar PV	Calipatria, CA		CAISO
Manzana Wind	Wind	Tehachapi, CA	61671C	CAISO
Mesa Wind Farm	Wind	Riverside County, CA	60370A	CAISO
MM Prima Deshecha Energy, LLC	Biogas	San Juan Capistrano, CA	60552A	CAISO
MM San Diego - Miramar	Biogas	San Diego, CA	60481A	CAISO
MMR Campo Verde	Solar PV	Imperial Valley		CAISO
Mushroom Power - CRE (FIT)	Biomass	San Diego,CA		CAISO
Ocotillo Wind Energy Facility	Wind	Imperial Valley, CA	61400C	CAISO
Otay Landfill I	Biogas	Chula Vista, CA	60433E	CAISO
Otay Landfill II	Biogas	Chula Vista, CA	60434E	CAISO
Otay Landfill V - CRE (FIT)	Landfill gas	San Diego,CA		CAISO
Otay Landfill VI - CRE (FIT)	Landfill gas	San Diego,CA		CAISO
Pacific Wind, LLC	Wind	Tehachapi, CA	61555C	CAISO
Phoenix West	Wind	Riverside County, CA	60445A	CAISO
RAM (To be added)	Solar PV	Various in SD County		CAISO
Regenerate Seville	Solar PV	El Centro, CA		CAISO
Rugraw Lassen Lodge Hydro	Small Hydro	Lassen, CA		CAISO
San Marcos Landfill	Biogas	San Marcos, CA	60435A	CAISO
SDG&E SEP (UOG)	Solar PV	Various in SD County		CAISO
SDG&E Sustainable	Solar PV	Various in SD County	Various	CAISO
Soitec Desert Green	Solar PV	Borrego Springs, CA		CAISO
Soitec Eastland	Solar PV	Boulevard, CA		CAISO
Soitec Rugged	Solar PV	Boulevard, CA		CAISO
Soitec TDS	Solar PV	Boulevard, CA		CAISO
Soitec Westland	Solar PV	Boulevard, CA		CAISO
Sol Orchard	Solar PV	San Diego County, CA (distributed)		CAISO
Solargen2	Solar PV	Imperial Valley, CA		CAISO
SunEdison Cascade	Solar PV	SunFair , CA		CAISO
Tenaska South	Solar PV	Calexico, CA		CAISO
Tenaska West	Solar PV	Imperial Valley, CA		CAISO
Victor Mesa Linda B	Solar PV	Victorville, CA		CAISO

Western Antelope Dry Ranch	Solar PV	Lancaster, CA	CAISO
Zodiac Power Solar A - CRE (FIT)	Solar PV	Potrero, CA	CAISO
Zodiac Solar E - CRE (FIT)	Solar PV	Potrero, CA	CAISO

- 2. <u>TECHNOLOGY (INCLUDING LEVEL OF MATURITY</u>): The Projects that the Category 1 energy and RECs are being sold from consist of various renewable technologies including: biomass, biogas, and geothermal renewable resources – all mature and proven technologies.
- 3. <u>GENERAL LOCATION AND INTERCONNECTION POINT</u>: The Projects are all located within California and are all interconnected with the California Independent System Operator ("CAISO") grid.

4. <u>OWNER(S) / DEVELOPER(S)</u>:

- a. **Name(s):** The owners of the Projects are listed above.
- b. Type of entity(ies) (e.g. LLC, partnership):

The owners of the facilities providing the bundled renewable energy and RECs are all limited liability companies.

The Buyers are:

The first agreement, the Exelon Proposed Agreement, is with Exelon Generation Company. Exelon is an energy company engaged in the generation and marketing of electricity. It has a diversified electricity generation portfolio which comprises of fossil, hydro, nuclear and renewable generation facilities.

Headquartered in Chicago, Exelon has operations and business activities in 47 states, the District of Columbia and Canada. The company is one of the largest competitive U.S. power generators, with approximately 34,700 megawatts of owned capacity comprising one of the nation's cleanest and lowest-cost power generation fleets. Its Constellation business unit provides energy products and services to approximately 100,000 business and public sector customers and approximately 1 million residential customers. Exelon's utilities deliver electricity and natural gas to more than 6.6 million customers in central Maryland (BGE), Northern Illinois (ComEd) and Southeastern Pennsylvania (PECO).

Exelon's subsidiary, Constellation NewEnergy, Inc., is one of the largest Energy Service Provider's (ESP's) in the State of California with service to direct access retail and commercial power consumers.

a twenty-four (24) month term and involves delivery from a list of wind, solar, biomass, biogas and/or geothermal operating California facilities. All of the facilities listed in the Proposed Agreement have been previously included in CPUC-approved SDG&E Advice Letters and are in SDG&E's current RPS Portfolio. The Noble Proposed Agreement establishes a firm initial delivery date of January 1, 2014.

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Arlington	Solar PV	Hassayampa, AZ		CAISO
Badger Filtration Plant	Conduit Hydro	Rancho Santa Fe, CA	60438E	CAISO
Bear Valley Hydro	Conduit Hydro	Escondido, CA	60439E	CAISO
Blue Lake Power, LLC	Biomass	Blue Lake, CA	60690A	CAISO
Borrego PV Solar I	Solar PV	Borrego Springs, CA	61211C	CAISO
Calpine Geysers	Geothermal	Sonoma & Lake County, CA	60002A	CAISO
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			60005A	CAISO
			60006A	CAISO
			60007A	CAISO
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			60009A	CAISO
			60012D	CAISO

Sales to Exelon, Pilot & Noble:

Sol Orchard	Solar PV	(distributed)		CAISO
		San Diego County, CA		
Soitec Westland	Solar PV Solar PV	Boulevard, CA		CAISO
Soitec TDS	Solar PV Solar PV	Boulevard, CA		CAISO
Soitec Rugged	Solar PV Solar PV	Boulevard, CA Boulevard, CA		CAISO
Soitec Desert Green	Solar PV Solar PV	Borrego Springs, CA		CAISO CAISO
Soitec Desert Green	Solar PV Solar PV	· · · ·	Various	
SDG&E SEP (UOG) SDG&E Sustainable	Solar PV Solar PV	Various in SD County Various in SD County	Various	CAISO CAISO
	Biogas Solar PV			
San Francisco Peak Hydro Plant San Marcos Landfill	Hydro	Oceanside, CA San Marcos, CA	60442E 60435A	CAISO CAISO
Rugraw Lassen Lodge Hydro	Small Hydro Conduit	Lassen, CA		CAISO
Regenerate Seville	Solar PV	El Centro, CA		CAISO
Rancho Penasquitos	Conduit Hydro	San Diego, CA	60470A	CAISO
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Otay Landfill I	Biogas	Chula Vista, CA	60433E	CAISO
Olivenhain Municipal	Hydro	Olivenhain, CA	60441E	CAISO
Ocotillo Wind Energy Facility	Wind Conduit	Imperial Valley, CA	61400C	CAISO
Oasis Power Partners, LLC	Wind	Mojave, CA	60489A	CAISO
Oasis Power Partners	Wind	Mojave, CA		CAISO
Mushroom Power - CRE (FIT)	Biomass	San Diego, CA		CAISO
Mountain View III	Wind	Riverside County, CA	60430A	CAISO
MMR Campo Verde	Solar PV	Imperial Valley		CAISO
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MM Prima Deshecha Energy, LLC	Biogas	San Juan Capistrano, CA	60552A	CAISO
Mesa Wind Farm	Wind	Riverside County, CA	60370A	CAISO
Manzana Wind	Wind	Tehachapi, CA	61671C	CAISO
Kumeyaay Wind Energy Facility	Wind	Boulevard, CA	60432A	CAISO
GRS - Sycamore	Biogas	Santee, CA	60486A	CAISO
Gestamp Calipatria	Solar PV	Calipatria, CA		CAISO
			60016C	CAISO
			60015C	CAISO
			60014C	CAISO
			60013D	CAISO

Solargen2	Solar PV	Imperial Valley, CA		CAISO
SunEdison Cascade	Solar PV			CAISO
Sycamore Landfill	Biogas	Santee, CA	60886A	CAISO
Tenaska South	Solar PV	Calexico, CA		CAISO
Tenaska West	Solar PV	Imperial Valley, CA		CAISO
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Zodiac Solar E - CRE (FIT)	Solar PV	Potrero, CA		CAISO

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