

1526 Washington, D.C. 20036

October 3, 2013

Tariff Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

To Whom It May Concern:

Please consider these comments during review of the proposed amendments to the Silver Lake South Agreement (PPA). The Public Utilities Commission (PUC) resolution and compare the value of the proposed project to the South PA projects from the 2011 RPS solicitation. The SCE's administrative record contains additional inaccuracies since the SCE acted upon the Primm Swell by separate regulatory proceedings to correct the record two years later.

SCE's PPA is a material change to the 2011 RPS interconnection outlined in the 2012 RPS. A material change to the CPUC issued in support of the PPA need for an entirely new transmission and distribution upgrades not identified in the 2011 RPS. The least-cost-best-fit (LCBF) assessment required to describe in SCE's 2009 RPS Procurement Plan. The Energy Division's evaluation of the PPA is inadequate. The 2012 RPS outlined in the 2012 RPS transmission and distribution facilities will be necessary to State South solar production. Primm with the Silver South PPA process may conflict with the PUC's decision about contracting.

The Commission approved the PPA for the Silver Lake South Substation as the POI, noting that the Dorado-Ivanpah Transmission Project is approved the Ivanpah Transmission Project in December 2012 funding has already been approved and allocated."

켄

Draft 섑 Resolution and 섑 Advice 섑 under 섑 Order 섑 of 섑 the 섑 new 섑 POI 섑 at 섑 the 섑 Primm 섑 Switchyard 섑 as 섑 indicating 섑 that 섑 these 섑 costs 섑 were 섑 not 섑 considered 섑 in 섑 the 섑 regarding 섑 the 섑 Silver 섑 State 섑 South 섑 Advice 섑 Letter 섑 project 섑 characteristic 섑 of 섑 an 섑 amended 섑 P from 섑 SCE's 섑 2011 섑 RPS 섑 Solicitation.

켄

According 섑 to 섑 섑 4545 섑 issued 섑 January 섑 24, 섑 as 섑 previously 섑 identified 섑 material 섑 change 섑 as 섑 섑 comparing 섑 an 섑 more 섑 recent 섑 RPS 섑 solicitation 섑 4545 섑 to 섑 섑 PPA 섑 amendment 섑 for 섑 the 섑 Rice 섑 Solar 섑 power 섑 project 섑 (part 섑 of and 섑 indicate 섑 the 섑 amended 섑 PPA 섑 was 섑 섑 offered 섑 for 섑 PG&E's 섑 resulting 섑 from 섑 its 섑 2009 섑 RPS 섑 Solicitation 섑 characteristics 섑 and 섑 the 섑 Rice 섑 Solar 섑 project 섑 had 섑 changed 섑 materially 섑 since 섑 the 섑 PPA, 섑 then 섑 Energy 섑 Division 섑 would 섑 have 섑 completed 섑 the 섑 projects 섑 resulting 섑 from 섑 PG&E's 섑 2011 섑 RPS 섑 Solicitation 섑 and 섑 contracts 섑 approved 섑 by 섑 the 섑 CP

켄

Also, 섑 the 섑 proposed 섑 amendment 섑 to 섑 the 섑 PPA 섑 exposes 섑 the 섑 PPA, 섑 and 섑 섑 can 섑 state 섑 the 섑 value 섑 of 섑 the 섑 or 섑 the 섑 Letter 섑 2905-E 섑 states 섑 that 섑 섑 to 섑 the 섑 approval 섑 of 섑 the 섑 PPA 섑 that 섑 its 섑 identification 섑 of 섑 the 섑 Silver 섑 State 섑 Switchyard's 섑 POI incorrect." 섑

켄

SCE's 섑 assertion 섑 섑 2905 SC's 섑 섑 with 섑 FERC 섑 dated 섑 0 preceded 섑 by 섑 approximately 섑 섑 months, 섑 섑 the 섑 Primm 섑 Switchyard 섑 섑 the 섑 POI 섑 filed 섑 a 섑 Large 섑 Generator 섑 Agreement 섑 (LGA) 섑 with 섑 FERC 섑 on 섑 October 섑 16, 섑 2011, 섑 as 섑 the 섑 POI 섑 for 섑 Silver 섑 State 섑 South, 섑 according 섑 to 섑 A to 섑 correct 섑 the 섑 CPUC 섑 4438 섑 findings, 섑 섑 on 섑 February 섑 lack 섑 of 섑 action 섑 for 섑 nearly 섑 two 섑 years 섑 of 섑 the 섑 SC's 섑 섑

Please 섑 let 섑 know 섑 if 섑 you 섑 have 섑 any 섑 questions

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Sincerely, 섑

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Shaun 섑 Gordon