

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 amending the Silver South agreement (PPA). The Public Utilities Commission (PUC) resolution and compare the value of the South PPA projects from 2011 to 2012. Solicitation. The SCE's administrative review of the inaccuracies since the SCE acted upon the Primm separate regulatory process to correct the record two years later.

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

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

