

December 13, 2013

 Advice 4313-E-A  
 (Pacific Gas and Electric Company ID U39 E)

Public Utilities Commission of the State of California

Subject: Supplemental Filing for Advice Letter Filing of PG&E's Fourth Renewable Auction Mechanism Power Purchase Agreement

## I. Purpose

In Advice Letter 4313-E ("Advice Letter"), Pacific Gas and Electric Company ("PG&E") submitted to the California Public Utilities Commission ("Commission" or "CPUC") four Power Purchase Agreements ("PPAs") executed as a result of its fourth Renewable Auction Mechanism ("RAM") Program auction ("Fourth RAM Solicitation").<sup>1</sup> In the Advice Letter, PG&E indicated that it would be making this supplemental filing to include a fifth RAM PPA resulting from the Fourth RAM Solicitation.

PG&E has now entered into a PPA with Blackwell Solar Park, LLC, ("Blackwell PPA") as follows:

Seller	Technology	Capacity (MW)	Location	Est. Annual Deliveries (GWh)	Commercial Operation Date (COD)	Term (years)
Blackwell Solar Park, LLC	Solar PV	20.0	Lost Hills	48.2	01/01/2016	20

The Blackwell PPA increases the amount of base capacity purchased by PG&E under the Fourth RAM Solicitation such that the total capacity contracted in the as-available peaking category is 48 MW, and the total capacity contracted in the overall solicitation is 73.3 MW, which satisfies the contracting goals adopted by the Commission for the Fourth RAM Solicitation.<sup>2</sup>

<sup>1</sup> Supplemental Advice Letters are authorized under General Order ("GO") 96-B, General Rules Section 7.5.1.

<sup>2</sup> 62 MW +/- 20 MW, and 82 MW +/- 20 MW, respectively.

In this supplement, PG&E also updates Appendix (Solicitation Map) to the map to accurately reflect locations of the RAM offers.

## II. Background

On November 15, 2013, PG&E submitted the Advice Letter seeking Commission approval of four PPAs that PG&E entered into as a result of the Fourth RAM Solicitation attached on June 28, 2013. These four PPAs have a combined capacity of 53.3 MW, which is not enough to fulfill the overall solicitation target of 82 MW, plus or minus 20 MW. The two as-available peaking PPAs in this group total 28 MW, which does not meet the as-available peaking category target of 62 MW, plus or minus 20 MW. PG&E executed the fifth RAM PPA, which is the subject of this Advice Letter, to meet these two targets.

## III. Request for Commission Approval

PG&E requests the Commission approve the RAM Program PPAs, including the Blackwell PPA, through an Energy Division disposition letter issued within 30 days of the filing of this supplement (by January 12, 2014), including adoption of the following findings of fact and conclusions of law:

1. Each of the Fourth RAM Solicitation PPAs be approved in entirety, including payments to be made by PG&E pursuant to each PPA, subject to the Commission's review of PG&E's administration of the PPA;
2. A finding that the selection of the RAM Solicitation PPAs was consistent with PG&E's approved RAM Program Solicitation protocol and that the terms of each PPA, including the price of delivery, are reasonable and prudent;
3. A finding that any procurement pursuant to the Fourth RAM Solicitation PPAs constitutes procurement from an eligible energy resource for purposes of determining PG&E's compliance with any obligation that it may have to procure eligible renewable energy resources pursuant to the California Public Utilities Code Section 399.11 et seq.), Decision (D.) 03-06-071, D.06-10-050, D.10-12-048, D.11-12-020, D.11-12-052, Resolution E-44 or applicable law;
4. A finding that, subject to after-the-fact verification that applicable criteria have been met, the Energy Division accepts PG&E's stipulation that deliveries from the Fourth RAM Solicitation PPAs should be categorized as procurement under the portfolio content category specified in Public Utilities Code Section 399.16 (b)(1)(A);
5. Adoption of the following findings with respect to compliance with the EPS adopted in Rulemaking (R.) 06-04-009:
  - a. The Rising Tree Wind Farm II LLC PPA is pre-approved as meeting the EPS because it is for a wind facility by conclusion of Law 35 (b) of D.07-01-039;

- b. The Kekawaka Creek Hydroelectric Facility and three available peaking PPAs executed as part of the FVSB solicitation are not subject to the EPS because each of the respective facilities as a forecast capacity factor of less than 60 percent and, therefore, are generation under Paragraphs 1(a)(ii) and 3(2)(b) of the Adopted Inter-PPA Rules; and
- c. A finding that PG&E has provided notice of procurement required by D.06-01-038 in this Advice Letter; and
6. A finding that all procurement and administrative costs, as provided by Public Utilities Code section 399.14(g), associated with the RAMP program PPA shall be recovered in rates and all of the 'stranded costs' under the RAMP shall be recovered through PG&E's Energy Resource Recovery Account and recover any stranded costs consistent with D.08-09-012.

#### IV. Request for Confidential Treatment

In support of this supplemental filing, PG&E has provided the following confidential information: the executed Blackwell PPA and information that more specifically describes the rights and obligations of the parties, and the confidential details of the solicitation. This information is being submitted in the material by D.08-04-023 and the August 22, 2006 Administrative Law Judge's Ruling Clarifying Procedures for Complying with D.06-06-066 to demonstrate the confidentiality of material and to the protection of confidential utility information provided under the terms of the IOU Matrix, Appendix 1 of D.06-06-066 and Appendix C of D.08-04-023, or General Order 66-C. A separate Declaration Seeking Confidential Treatment is being filed concurrently with this supplement.

#### Confidential Attachments:

- Confidential Appendix A: Solicitation Project and Development Milestones for Executed Contracts (Redacted version included with public filing)
- Confidential Appendix D: Net Market Value Table
- Confidential Appendix E: Independent Evaluator Report (Redacted version included with public filing)
- Confidential Appendix F-5: Executed Contract

#### Protests

Anyone wishing to protest this filing may do so by U.S. mail, facsimile or E-mail, no later than January 2, 2014, which is 20 days after the date of this filing. Protests submitted to:

CPUC Energy Division  
 ED Tariff Unit  
 505 Van Ness Avenue, 4<sup>th</sup> Floor  
 San Francisco, California 94102

Facsimile: (415) 703-2200  
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E by email or U.S. mail (and by facsimile, if possible) at the address shown below on the date the protest is mailed or delivered to the Commission:

Brian K. Cherry  
Vice President, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, California 94177

Facsimile: (415) 973-7226  
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, organizations) may protest to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice protested; grounds for protest; supporting factual information or legal argument; name, telephone, postal address, (where appropriate) e-mail address of the protester; and a statement that the protest was submitted no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

#### Effective Date

Accordingly, PG&E requests that the Energy Division issue a decision approving PG&E's five RAM Program PPAs within the initial period, which will expire within 30 days of the filing of this supplemental filing (by 2:00 PM on January 14, 2014). Pursuant to General Order 96-B, the Advice Letter will be effective upon approval.

#### Notice

In accordance with General Order 96-B, Section IV, a copy of this letter is being sent electronically and via U.S. mail to the parties shown on the attached and the service list for R.11-05-005. Address changes to the General Order 96-B list and electronic approvals should be directed to PGETariffs@pge.com. For changes to other services, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Advice letter filings can also be electronically filed at: <http://www.pge.com/tariffs>.

Brian Cherry /IG

Vice President – Regulatory Relations

Attachments

cc: Paul Douglas – Energy Division  
Sean Simon – Energy Division  
Adam Schultz – Energy Division  
Service List for R.11-05-005

Limited Access to Confidential Material:

The portions of this Advice Letter marked Confidential Material are submitted under the confidentiality protection of Section 583 and 454.5(g) of the Public Utilities Code and General Order 66-C. This material is protected from public disclosure because it consists of, among other items, the contracts themselves and the information of a proposed RPS-eligible RAM contract, which are protected pursuant to D.06-06-066 and D.08-04-023. A separate Declaration seeking Confidential Treatment regarding the confidential information is filed concurrently herewith.

Attachments:

- Confidential Appendix A: Solicitation Data and Development Milestones for Executed Contracts (Redacted version included with public filing)
- Confidential Appendix D: Net Market Evaluation Table
- Confidential Appendix E: Independent Evaluator (Redacted version included with public filing)
- Confidential Appendix F-5: Executed Contract

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPU Utility: Pacific Gas and Electric Company (ID: U39E)

Utility type:

ELC     GAS

PLC     HEAT     WATER

Contact Person: Anupama Ege and Igor Grinberg

Phone #: (415) 973-7600 and (415) 973-8580

E-mail: a1vb@pge.com, ixg8@pge.com and PGETariffs@pge.com

EXPLANATION OF UTILITY TYPE

(Date Filed/ Received Stamp by CPUC)

ELC= Electric  
PLC= Pipeline

GAS= Gas  
HEAT= Heat

WATER= Water

Advice Letter (AL) # 13-E-A

Tier: 2

Subject of AL: Supplemental Filing for the Advice Letter Filing of PG&E's Fourth Renewable Auction Mechanism Power Purchase Agreement

Keywords (choose from CPU listing): Contracts, Portfolio

AL filing type: Monthly    Quarterly    Annual     One-Time    Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision D19-12-018 and Resolution E-4414

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarized differences between the AL and the prior withdrawn or rejected AL: \_\_\_\_\_

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for? See the attached matrix that identifies all of the confidential information.

Confidential information will be made available to those who have executed a nondisclosure agreement: Yes

All members of PG&E's Procurement Review Group who have signed nondisclosure agreements will receive the confidential information.

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: Dennis L. Sullivan (415) 973-4666

Resolution Required?  Yes     No

Requested effective date: January 12, 2014

No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests, dispositions, and all other correspondence regarding this AL are due no later than 20 days after the date otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission

Energy Division

ED Tariff Unit

505 Van Ness Ave., 4th Fl.

San Francisco, CA 94102

E-mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Pacific Gas and Electric Company

Attn: Brian Cherry

Vice President, Regulatory Relations

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)

**DECLARATION OF DENNIS L. SULLIVAN  
SEEKING CONFIDENTIAL TREATMENT  
FOR CERTAIN DATA AND INFORMATION CONTAINED IN  
ADVICE LETTER 4313-E-A  
(PACIFIC GAS AND ELECTRIC COMPANY - U 39 E)**

I, Dennis L. Sullivan, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"). I am a Renewable Energy Principal in PG&E's Energy Procurement organization. In this position, my responsibilities include management of PG&E's Renewable Auction Mechanism Power Purchase Agreements Request for Offers and finalization of the Power Purchase Agreements submitted for approval in this Advice Letter. In carrying out these responsibilities, I have acquired knowledge of such sellers in general and, based on my experience in dealing with facility owners and operators, I am familiar with the types of data and information about their operations that such owners and operators consider confidential and proprietary.

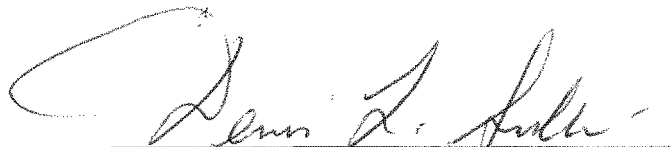
2. Based on my knowledge and experience, and in accordance with Decision ("D") 08-04-023 and the August 22, 2006 "Administrative Law Judge's Ruling Clarifying Interim Procedures for Complying with Decision 06-06-066," I make this declaration seeking confidential treatment of Appendix A, D, E and F to PG&E's Advice Letter 4313-E-A, submitted on December 13, 2013.

3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes the particular type of data and information listed in Appendix 1 of D.06-06-066 and Appendix C of D.08-04-023 ("the IOU Matrix"). The matrix also specifies the category or categories in the IOU Matrix to which the data and information corresponds, if applicable, and why confidential protection is justified. Finally, the matrix specifies that: (1)

PG&E is complying with the limitations specified in the IOU Matrix for that type of data or information, if applicable; (2) the information is not already public; and (3) the data cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that to the best of my knowledge, the foregoing is true and correct.

Executed on December 13, 2013, San Francisco, California.



DENNIS L. SULLIVAN



PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)

Advice Letter 4313-E-A

December 13, 2013

IDENTIFICATION OF CONFIDENTIAL INFORMATION PER DECISION 06-06-066 AND DECISION 08-04-023

Redaction Reference	1) The material submitted constitutes a particular type of data listed in the Matrix, appended as Appendix I to D.06-06-066 (Y/N)	2) Which category or categories in the Matrix the data correspond to:	3) That it is complying with the limitations on confidentiality specified in the Matrix for that type of data (Y/N)	4) That the information is not already public (Y/N)	5) The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure (Y/N)	PG&E's Justification for Confidential Treatment	Length of Time
Document: Advice Letter 4313-E-A							
Appendix A	Y	Item VIII B) Specific quantitative analysis involved in scoring and evaluation of participating bids.	Y	Y	Y	<p>This Appendix contains confidential net market value information from the Fourth RAM Solicitation. Disclosure of this information would provide valuable market sensitive information to competitors. Finally, this information has been obtained in confidence from the counterparties under an expectation of confidentiality. It is in the public interest to treat such information as confidential because if such information were made public, it could have a damaging effect on current and future negotiations with other counterparties in other renewables programs.</p>	For information covered under Item VIII B), remain confidential for three years after winning bidders selected.

PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)

Advice Letter 4313-E-A

December 13, 2013

IDENTIFICATION OF CONFIDENTIAL INFORMATION PER DECISION 06-06-066 AND DECISION 08-04-023

Redaction Reference	1) The material submitted constitutes a particular type of data listed in the Matrix, appended as Appendix 1 to D.06-06-066 (Y/N)	2) Which category or categories in the Matrix the data correspond to:	3) That it is complying with the limitations on confidentiality specified in the Matrix for that type of data (Y/N)	4) That the information is not already public (Y/N)	5) The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure (Y/N)	PG&E's Justification for Confidential Treatment	Length of Time
Appendix D	Y	<p>Item VII G) Renewable Resource Contracts under RPS program – Contracts without SEPs</p> <p>Item VIII A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids.</p> <p>Item VII (un-numbered category following VII G) Score sheets, analyses, evaluations of proposed RPS projects.</p>	Y	Y	Y	<p>This Appendix contains the confidential summary and discussion of expected customer benefits of these PPAs, brief overview of need, confidential pricing information and net market value calculations.</p> <p>Disclosure of this information would provide valuable market sensitive information to competitors. It is in the public interest to treat such information as confidential because if such information were made public, it could have a damaging effect on current and future negotiations with other counterparties in other renewables programs.</p>	<p>For information covered under Item VII G) remain confidential for three years after the commercial operation date, or one year after expiration (whichever is sooner).</p> <p>For information covered under Item VIII A), remain confidential until after final contracts submitted to CPUC for approval.</p> <p>For information covered under Item VIII B), remain confidential for three years after winning bidders selected.</p> <p>For information covered under un-numbered category following VII G), remain confidential for three years after the commercial operation date.</p>

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)**

**Advice Letter 4313-E-A**

**December 13, 2013**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION PER DECISION 06-06-066 AND DECISION 08-04-023**

Redaction Reference	1) The material submitted constitutes a particular type of data listed in the Matrix, appended as Appendix 1 to D.06-06-066 (Y/N)	2) Which category or categories in the Matrix the data correspond to:	3) That it is complying with the limitations on confidentiality specified in the Matrix for that type of data (Y/N)	4) That the information is not already public (Y/N)	5) The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure (Y/N)	PG&E's Justification for Confidential Treatment	Length of Time
Appendix E	Y	<p>Item VII G) Renewable Resource Contracts under RPS program – Contracts without SEPs</p> <p>Item VII (un-numbered category following VII G) Score sheets, analyses, evaluations of proposed RPS projects.</p> <p>Item VIII A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids.</p>	Y	Y	Y	This Appendix contains the Independent Evaluator Report which includes confidential information on the bids and bid evaluations. Disclosure of this information would provide valuable market sensitive information to competitors.	<p>For information covered under Item VII G) and un-numbered category following VII G), remain confidential for three years after the commercial operation date.</p> <p>For information covered under Item VIII A), remain confidential until after final contracts submitted to CPUC for approval.</p> <p>For information covered under Item VIII B), remain confidential for three years after winning bidders selected</p>
Appendix F	Y	Item VII G) Renewable Resource Contracts under RPS program - Contracts without SEPs.	Y	Y	Y	This Appendix contains the PPA for which PG&E seeks approval in the Advice Letter filing. Disclosure of this information would provide valuable market sensitive information to competitors. Furthermore, the counterparty to the PPA has an expectation that the terms of the PPA will remain confidential.	For information covered under Item VII G), remain confidential for three years after the commercial operation date, or one year after expiration (whichever is sooner).

## **Appendix A**

### **Solicitation Data and Project Development Milestones for Executed Contracts**

**(Redacted version included with public filing)**

**Table 1. Overview of fourth RAM RFO**

	<b>Seller's (Developer's) Name</b>	<b>Number of bids submitted</b>	<b>Full Capacity project</b>	<b>Energy Only project</b>	<b>Number of bids shortlisted</b>	<b>Number of executed contracts</b>
1	8minutenergy Saferay Holding 1LLC	1			N/A	1
2	Adera Solar, LLC (Pacific Valley)	1			N/A	
3	AES Tehachapi Wind, LLC	2			N/A	
4	Altamont Winds	2			N/A	
5	Brookfield Renewable Energy Partners (coram)	2			N/A	
6	Bull Moose Energy, LLC	1			N/A	
7	CalWind Resources, Incorporated	2			N/A	
8	EC&R NA Solar PV, LLC	2			N/A	
9	EDF Renewable Development, Inc.	9			N/A	
10	EDP Renewables North America LLC	1			N/A	1
11	Element Power US, LLC	1			N/A	
12	Energy Development & Construction Corporation	3			N/A	
13	Eurus Energy America LLC	1			N/A	
14	First Solar	12			N/A	
15	Frontier Renewables LLC / Activ Solar GmbH	6			N/A	1
16	GCL-SR LLC	2			N/A	
17	Gestamp Asetym Solar North America, Inc.	5			N/A	
18	Gradient Resources Inc.	1			N/A	
19	Greenleaf Power	3			N/A	
20	Hanwha Q Cells USA Corp. ("Q Cells")	1			N/A	1
21	Helios Renewables LLC / Canadian Solar (USA) Inc	2			N/A	
22	Infigen	2			N/A	
23	Montauk Energy	1			N/A	
24	Native American Energy Resources, LLC	1			N/A	
25	New Dimension Energy Company, LLC	3			N/A	
26	NextEra Energy Resources, LLC	6			N/A	
27	Northbrook Energy	2			N/A	1
28	Northlight Power, LLC	2			N/A	
29	NRG Solar	2			N/A	
30	Pristine Sun, LLC	3			N/A	
31	Recurrent Energy	8			N/A	
32	Ridgeline Energy LLC	1			N/A	
33	Sempra U.S. Gas and Power	1			N/A	
34	Sierra Power Corporation	1			N/A	
35	Silverado Power	21			N/A	
36	SKIC Solar, LLC	1			N/A	
37	Solar Electric Solutions, LLC	1			N/A	
38	Solar Projects Solutions, LLC	1			N/A	
39	SolarReserve, LLC	1			N/A	
40	SRPV, LLC	1			N/A	
41	SunEdison	2			N/A	
42	Terra-Gen Development Co.	3			N/A	
43	Trina Solar US Development	1			N/A	
44	W Power, LLC	1			N/A	
45	WDG Capital Partners I, LP	2			N/A	
46	Windland, Inc.	1			N/A	

Note: Given the structure of the RAM program, the concept of a shortlist is not applicable.

**Table 2. Overview of fourth RAM RFO by Capacity**

	<b>Contract Size (MW)</b>	<b>Number of Bids Submitted</b>	<b>Number of Bids Shortlisted</b>	<b>Number of executed contracts</b>
1	3-5	10	N/A	0
2	>5-10	21	N/A	1
3	>10-15	18	N/A	2
4	>15-20	80	N/A	2

Note: Given the structure of the RAM program, the concept of a shortlist is not applicable.

**Table 3. Overview of fourth RAM RFO by Technology**

	<b>Participating Technology</b>	<b>Number of Bids Submitted</b>	<b>Number of Bids Shortlisted</b>	<b>Number of executed contracts</b>
1	<b>Solar PV</b>	99	N/A	3
2	<b>Wind</b>	21	N/A	1
3	<b>Geothermal</b>	1	N/A	0
4	<b>Biogas</b>	1	N/A	0
5	<b>Biomass</b>	5	N/A	0
6	<b>Small Hydro</b>	2	N/A	1

Note: Given the structure of the RAM program, the concept of a shortlist is not applicable.

**Table 4. Detailed Summary of fourth RAM RFO selection by Technology Type - All Bids**

Technology Type	Total # of Bids into RFO	Total # of Eligible Bids	Total # of Bids Shortlisted	Total # of Executed Contracts	Mean RFO Bid Size (MW)	Mean Shortlist Bid Size (MW)	Mean Contract Size (MW)	No. of RFO Bids that Failed Each Viability Screen				
								Dev. Exp.	Site Control	CommercializedTech.	Interconnection	COD >24 mos
1 Solar PV	99	97	N/A	2	16.5	N/A	16	0	0	0	2	27
2 Wind	21	21	N/A	1	12.4	N/A	19.8	0	0	0	0	0
3 Geothermal	1	1	N/A	0	20.0	N/A	0	0	0	0	0	0
4 Biomass	1	1	N/A	0	16.3	N/A	0	0	0	0	0	0
5 Biogas	5	5	N/A	0	20.0	N/A	0	0	0	0	0	0
6 Small Hydro	2	2	N/A	1	5.5	N/A	5.5	0	0	0	0	0

**Note:** Given the structure of the RAM program, the concept of the shortlist is not applicable.



**Table 5. All Bids**

Net Market Value Overview by Project Size (MW)						
	RAM RFO			RAM Shortlist		
	Min.	Max.	Mean	Min.	Max.	Mean
3-5				N/A	N/A	N/A
>5-10				N/A	N/A	N/A
>10-15				N/A	N/A	N/A
>15-20				N/A	N/A	N/A

**Table 6. All Bids**

Net Market Value Overview by Technology Type						
	RAM RFO			RAM Shortlist		
	Min.	Max.	Mean	Min.	Max.	Mean
Solar PV				N/A	N/A	N/A
Wind				N/A	N/A	N/A
Geothermal				N/A	N/A	N/A
Biogas				N/A	N/A	N/A
Biomass				N/A	N/A	N/A
Small Hydro				N/A	N/A	N/A

Note: Given the structure of the RAM program, the concept of the shortlist is not applicable.

Table 7. Project Development Milestones for Executed RAM Contracts

Project Overview										
Project Name	Contract Manager	Company Name (Parent Company/Developer)	Project Status (Delayed/On Schedule)	Product Category	Technology Type	Location (City / County)	RAM RFO Number	Original Bid Capacity (MW)	Installed Capacity (MW)	Full Buy/Sell or Excess Sales
Mammoth G3	Ryan Susanto	Ormat Nevada, Inc.	On Schedule	Baseload	Geothermal	Mammoth Lakes/ Mono County	RFO 1	14	15	Excess Sales
West Antelope	Ryan Susanto	Canadian Solar (USA) Inc.	On Schedule	As Available Peaking	Solar PV	Lancaster/ Los Angeles County	RFO 1	20	20	Full Buy/Sell
Western Antelope Blue Sky Ranch A	Ryan Susanto	Silverado Power	On Schedule	As Available Peaking	Solar PV	Lancaster/ Los Angeles County	RFO 1	20	20	Full Buy/Sell
Wind Resource 1	Ryan Susanto	CalWind Resources, Inc.	On Schedule	As Available Non-Peaking	Wind	Tehachapi/ Kern County	RFO 1	8.71	8.71	Full Buy/Sell
Mammoth G1	Jessica Tse	Ormat Technologies, Inc.	On Schedule	Baseload	Geothermal	Mammoth / Mono County	RFO 2	7.5	7.5	Excess Sales
Wind Resource II	Ryan Susanto	Calwind Resources, Inc.	On Schedule	As Available Non-Peaking	Wind	Tehachapi / Kern County	RFO 2	19.95	19.95	Full Buy/Sell
SPS, White River West, LLC	Jessica Tse	Solar Projects Solutions	On Schedule	As Available Peaking	Solar PV	Alpaugh / Tulare County	RFO 2	19.75	19.75	Full Buy/Sell
GASNA 27P, LLC (Peabody RB)	Tim Della Maggiore	Gestamp Asetym Solar North America, Inc.	On Schedule	As Available Peaking	Solar PV	Yacaville / Unincorporated area of Solano County	RFO 2	14	14	Full Buy/Sell
Columbia Solar Energy, LLC	Tim Della Maggiore	LS Power	On Schedule	As Available Peaking	Solar PV	Pittsburg / Contra Costa County	RFO 2	20	20	Full Buy/Sell
Alamo Solar, LLC	Tim Della Maggiore	E.ON Climate & Renewables	On Schedule	As Available Peaking	Solar PV	Oro Grande / San Bernardino County	RFO 2	20	20	Full Buy/Sell
Corcoran Irrigation District Solar PV Project	Ryan Susanto	EDF Trading North America, LLC	On Schedule	As Available Peaking	Solar PV	Corcoran / Kings County	RFO 2	19.76	19.76	Full Buy/Sell
Sand Hill Wind	Jessica Tse	FloDesign Wind Turbine Corp.	On Schedule	As Available Non-Peaking	Wind	Tracy / San Joaquin County	RFO 3	20	20	Full Buy/Sell
RE Old River One LLC	Ryan Susanto	Recurrent Energy	On Schedule	As Available Peaking	Solar PV	Bakersfield / Kern County	RFO 3	20	20	Full Buy/Sell
Shafter Solar	Jessica Tse	NextEra Energy Resources, LLC	On Schedule	As Available Peaking	Solar PV	Shafter / Kern County	RFO 3	19.98	19.98	Full Buy/Sell
GASNA 31P, LLC (Twisselman 1 Solar)	Tim Della Maggiore	Gestamp Asetym Solar North America, Inc.	On Schedule	As Available Peaking	Solar PV	Lost Hills / Kern County	RFO 3	15	15	Full Buy/Sell
Rising Tree Wind Farm II LLC	Jessica Tse	EDP Renewables North America LLC	On Schedule	As Available Non-Peaking	Wind	Mojave/Kern	RFO 4	19.8	19.8	Full Buy/Sell
Kekawaka Creek Hydroelectric Facility	Jessica Tse	Northbrook Energy	On Schedule	As Available Non-Peaking	Hydro	Zenia/Trinity and Humboldt Counties	RFO 4	5.5	5.6	Full Buy/Sell
STRL SME LLC (Woodmere Solar Farm)	Jessica Tse	Sminutenergy Saferay Holding LLC	On Schedule	As Available Peaking	Solar PV	Edison/Kern County	RFO 4	15	15	Full Buy/Sell
Three Rocks Solar	Jessica Tse	Hanwha Q Cells USA Corp.	On Schedule	As Available Peaking	Solar PV	Three Rocks/Fresno	RFO 4	13	13	Full Buy/Sell
Blackwell Solar Park	Jessica Tse	Blackwell Solar Park, LLC	On Schedule	As Available Peaking	Solar PV	Lost Hills / Kern County	RFO 4	20	20	Full Buy/Sell

Table 7. Project Development Milestones for Executed RAM Contracts

Project Name	Contract Manager	Company Name (Parent Company/Developer)	Regulatory			Commercial Operation Date			Necessary Permitting and Government Approvals				Interconnection (IC) Status		
			CPUC Non-Appealable Approval Date	6-Month Regulatory Delay (Yes/No)	Reason for Reg. Delay	Contract GCDD	Actual COD	Construction Started (Y/N)	Necessary Permits/Govt. Approvals Received (Y/N)	Necessary Permits/Govt. Approvals Filed (Y/N)	If Filed, Expected Date for Permits/Govt. Approval	If not Filed, Expected File Date	IC Agreement Signed (Y/N)	IC Application Deemed Complete (Y/N)	Stage in IC Process (Study/Agreement/Construction)
Mammoth G3	Ryan Susanto	Ormat Nevada, Inc.	5/14/2012	No	N/A	11/14/2013	4/1/2013	N/A (Existing)	Y	Y	Complete	N/A	Y	Y	Agreement
West Antelope	Ryan Susanto	Canadian Solar (USA) Inc.	5/14/2012	Yes	Transmission Delay	5/14/2014	TBD	N	N	Y	11/20/2013	N/A	Y	Y	Agreement
Western Antelope Blue Sky Ranch A	Ryan Susanto	Silverado Power	5/14/2012	Yes	Transmission Delay	5/14/2014	TBD	N	N	Y	3/31/2014	N/A	Y	Y	Agreement
Wind Resource 1	Ryan Susanto	CalWind Resources, Inc.	5/14/2012	No	N/A	11/14/2013	12/17/2012	N/A (Existing)	Y	Y	Complete	N/A	Y	Y	Agreement
Mammoth G1	Jessica Tse	Ormat Technologies, Inc.	11/20/2012	No	N/A	11/20/2014	TBD	N/A (Existing)	Y	Y	Complete	N/A	Y	Y	Agreement
Wind Resource II	Ryan Susanto	Calwind Resources, Inc.	11/20/2012	No	N/A	11/20/2014	9/30/2013	N/A (Existing)	Y	Y	Complete	N/A	Y	Y	Agreement
SPS, White River West, LLC	Jessica Tse	Solar Projects Solutions	11/20/2012	Yes	Permitting Delay	5/20/2015	TBD	N	Y	Y	Complete	N/A	Y	Y	Agreement
GASNA 27P, LLC (Peabody RB)	Tim Della Maggiore	Gestamp Asetyn Solar North America, Inc.	11/20/2012	No	N/A	11/20/2014	TBD	N	N	Y	6/30/2014	N/A	Y	Y	Agreement
Columbia Solar Energy, LLC	Tim Della Maggiore	LS Power	11/20/2012	No	N/A	11/20/2014	TBD	N	Y	Y	Complete	N/A	Y	Y	Agreement
Alamo Solar, LLC	Tim Della Maggiore	E.On Climate & Renewables	11/20/2012	Yes	Transmission Delay	5/20/2015	TBD	N	N	Y	2/15/2014	N/A	Y	Y	Agreement
Corcoran Irrigation District Solar PV Project	Ryan Susanto	EDF Trading North America, LLC	11/20/2012	No	N/A	11/20/2014	TBD	N	Y	Y	Complete	N/A	Y	Y	Agreement
Sand Hill Wind	Jessica Tse	FlDesign Wind Turbine Corp.	6/10/2013	No	N/A	6/10/2015	TBD	N	Y	Y	Complete	N/A	Y	Y	Agreement
RE Old River One LLC	Ryan Susanto	Recurrent Energy	6/10/2013	No	N/A	6/10/2015	TBD	N	Y	Y	Complete	N/A	Y	Y	Agreement
Shafter Solar	Jessica Tse	NextEra Energy Resources, LLC	6/10/2013	No	N/A	6/10/2015	TBD	N	Y	Y	Complete	N/A	Y	Y	Agreement
GASNA 31P, LLC (Twisselman 1 Solar)	Tim Della Maggiore	Gestamp Asetyn Solar North America, Inc.	6/10/2013	No	N/A	6/10/2015	TBD	N	N	Y	6/30/2014	N/A	Y	Y	Agreement
Rising Tree Wind Farm II LLC	Jessica Tse	EDP Renewables North America LLC	TBD	No	N/A	24 Months from CPUC Approval	TBD	N	N	Y	3/15/2014	N/A	Y	Y	Agreement
Kekawaka Creek Hydroelectric Facility	Jessica Tse	Northbrook Energy	TBD	No	N/A	24 Months from CPUC Approval	TBD	N/A (Existing)	Y	Y	Complete	N/A	Y	Y	Agreement
87RL SME LLC (Woodmere Solar Farm)	Jessica Tse	Sminutenergy Saferay Holding LLC	TBD	No	N/A	24 Months from CPUC Approval	TBD	N	N	Y	3/1/2014	N/A	Y	Y	Agreement
ThreeRocks Solar	Jessica Tse	Hanwha Q Cells USA Corp.	TBD	No	N/A	24 Months from CPUC Approval	TBD	N	Y	Y	Complete	N/A	Y	Y	Agreement
Blackwell Solar Park	Jessica Tse	Blackwell Solar Park, LLC	TBD	No	N/A	24 Months from CPUC Approval	TBD	N	N	Y	3/31/2015	N/A	N	Y	Agreement

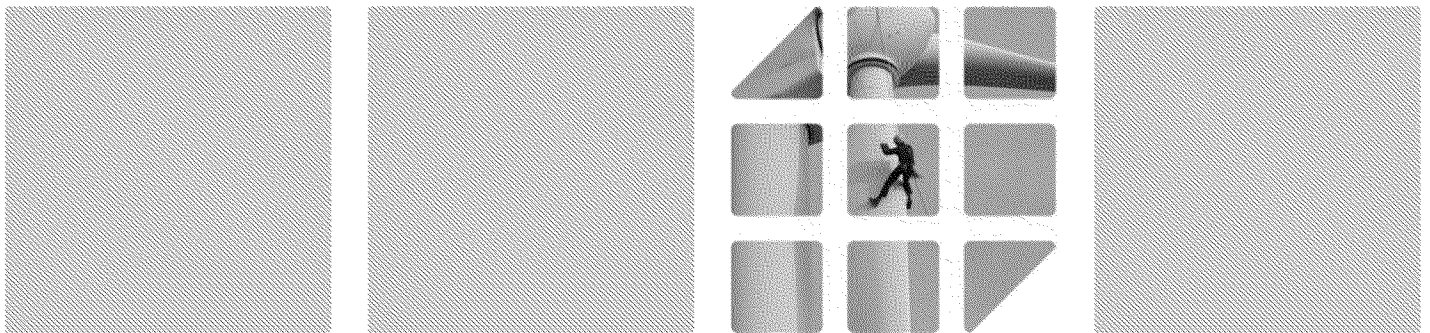
**Confidential Appendix E**

**Independent Evaluator Report**

**(Redacted version included with public filing)**

## Independent Evaluator Report (Amended)

Advice Letter Filing of the Fourth Renewable Auction Mechanism  
("RAM") Agreements in Accordance with the PG&E RAM Request for  
Offers ("RFO")



December 6, 2013

**SUBJECT: Advice Letter Filing of Fourth Renewable Auction Mechanism (“RAM”) Agreements in Accordance with the PG&E RAM Request for Offers (“RFO”).**

**Describe in detail the role of the IE throughout the solicitation and negotiation process.**

Pacific Gas & Electric (“PG&E”) retained Charles Adkins, of Ventyx LLC, to provide Independent Evaluator (“IE”) Services for PG&E’s Fourth RAM RFO (“RAM RFO”). Specifically, Mr. Adkins worked with PG&E to ensure that offers were evaluated consistently and appropriately in accordance with the solicitation protocol and in accordance with applicable rules and processes of the California Public Utilities Commission (“CPUC”). The role of the Independent Evaluator is defined in Resolution E-4582, Appendix A; “Utilities will employ an Independent Evaluator to assess the competitiveness and integrity of each RAM auction and submit the IE’s report with its Tier 2 advice letter requesting approval of contracts resulting from those auctions. Mr. Adkins has been involved with PG&E’s RAM RFO throughout the process.

Mr. Adkins active involvement began in May of 2013. On May 9, 2013, the CPUC issued their revised rules for the RAM RFO, Resolution E-4582. Mr. Adkins and the PG&E solicitation team conducted a project kick-off meeting, June 11, 2013, where the overall RAM RFO schedule was discussed. Mr. Adkins reviewed the PG&E draft protocols, Resolution E-4582, Appendix A, and PG&E’s filed Compliance Filing Advice Letter 4225-E; Appendix B. Mr. Adkins reviewed PG&E’s solicitation documents and found them consistent with Resolution E-4582 and Advice Letter E-4225-E. Mr. Adkins reviewed the standard power purchase agreement (“PPA”) and the proposed bidder list for outreach. Prior to the issuance of the RAM RFO, Mr. Adkins reviewed the PG&E web site ([www.pge.com/rfo/RAM](http://www.pge.com/rfo/RAM)) from a bidder’s perspective to ensure that all registrations were valid and all links were live. Mr. Adkins reviewed the forms associated with the RAM RFO to validate the ease of use and completeness of the forms. The last issue addressed by Mr. Adkins prior to bid release was the nature of affiliate bids. PG&E did not have any affiliate bids in the RAM RFO.

Upon release of the RAM RFO, May 28, 2013, Mr. Adkins was involved in all bidder communications. PG&E’s RAM RFO clearly spelled out that the IE was to be included in all communications. Mr. Adkins reviewed and tracked bidder questions and PG&E’s responses. On June 12, 2013, Mr. Adkins attended the PG&E RAM RFO Bidder’s Webinar. Prior to the RAM RFO Offers due date of June 28, 2013, Mr. Adkins continued to review and track bidder questions and PG&E’s responses.

On June 28, 2013, Mr. Adkins received and processed the bids. PG&E staff submitted their master list of received bids on July 1, 2013. Mr. Adkins reviewed and compared the received bid list and found them to be consistent. None of bidders failed to include Mr. Adkins on their original offering. Mr. Adkins performed an electronic review of the Bid Forms to determine the completeness of the bidder’s responses. While PG&E conducted their review of the bids, Mr. Adkins reviewed PG&E’s detailed internal processes for offer scoring and selection.

From June to the September, Mr. Adkins reviewed and monitored discussions between bidders and PG&E staff regarding bid confirmations, bid deficiency notices, and general issues/questions. Mr. Adkins and PG&E reviewed and discussed the initial bid evaluations and deficiency notices. Mr. Adkins provided a preliminary assessment of the RAM RFO evaluation in PG&E’s Steering Committee meeting on July 26, 2013. Mr. Adkins attended several meetings with PG&E Staff; PG&E Steering Committee, July 26, 2013. Unfortunately, personal issues prevented Mr. Adkins from attending the PRG meeting on August 13, 2013. Mr. Adkins was asked by the PRG to investigate issues related to the Baseload Category, to be discussed later. At these meetings, Mr. Adkins presented his opinion of PG&E’s satisfactory conduct throughout the solicitation and evaluation process.

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## **How did the IOU conduct outreach to bidders, and was the solicitation robust?**

PG&E has posted all relevant information regarding the RAM RFO on the PG&E Website under the Wholesale Electric Power Procurement section of the Energy Supply page. A Google search of "PG&E RAM RFO" adequately directed web users to the PGE RAM RFO web page. Given the depth and quality of potential bidders noted in Mr. Adkins' previous three Advice Letters, Mr. Adkins did not see a need for a detailed review of PG&E's potential bidder list.

On May 28, 2013, PG&E e-mailed the RAM RFO to the potential bidders. On June 12, 2013, PG&E conducted a Bidder's Webinar that was open to the public. 61 bidders attended the Webinar. Mr. Adkins also attended the Bidder's Webinar.

PG&E staff was committed and responsive to questions from potential bidders. Between the period the RFP was issued and the Bidder Webinar, PG&E received a number of questions from potential bidders. PG&E's responses were timely, usually answered the same day. PG&E responses were consistent with the RAM RFO protocol.

The Bidder's Webinar was the first formal venue for potential bidders to directly speak with PG&E Staff. On June 12, 2013, PG&E conducted a Bidder's Webinar that was open to the public. The purpose of the Bidder's Webinar was to assist participants who may submit Offers to PG&E's Fourth Renewable Auction Mechanism (RAM) RFO or future RAM RFO's. Bidders could ask questions via e-mail to the RAM RFO mailbox. The bidder conference covered: 1) the PGE RAM RFO procurement targets, 2) Technical updates from the Third RAM RFO, 3) RAM 4 RFO Schedule, 4) Role of the Independent Evaluator, 5) Eligibility Requirements, 6) Power Purchase Agreement ("PPA") overview, 7) Time of Delivery ("TOD") Factors, 8) Evaluation Methodology, 8) Offer Submittal Process and Offer Form, 9) Keys to a successful proposal, 10) Offer Price Assumptions, 11) Offer Submittal, 12) Required Offer Submission Forms, 13) Communications and Website, 14) Offer Form Structure, 15) Offer Form Instructions, 16) Interconnection Information, and 17) Questions and Answers. PG&E had adequate staff available to respond to bidder questions. Sixteen questions were posed by the bidders. PG&E responded to all questions in a timely and thorough basis.

Following the determination of PG&E's selected bidders, PG&E provided feedback sessions, upon request, with bidders that were not selected. The purpose of these meetings was to address any outstanding questions that the bidders may have and to provide feedback as to the statistical quartile ranking of their bid.

## **Was the outreach sufficient and materials clear such that the bids received meet the needs the solicitation was intending to fill?**

Mr. Adkins finds that sufficient publicity surrounded the RAM RFO release. In addition to PG&E's RAM RFO, other California utilities were issuing similar RAM RFO's. Mr. Adkins has no recommendations to extend the bidder outreach.

Mr. Adkins further reviewed the list of questions posed by the potential bidders to identify any potential communication issues. Based upon the questions posed by bidders and PG&E responses, Mr. Adkins does not find any deficiencies with the PG&E's solicitation or their communication with the bidders.

Mr. Adkins was unable to attend all of the feedback sessions. Of the sessions that Mr. Adkins was able to attend, he found PG&E feedback to be clear and consistent.

**Please evaluate the fairness of the IOU's bidding and selection process. (i.e. quantitative and qualitative methodology used to evaluate bids, consistency of evaluation methods with criteria specified in bid documents, etc.)?**

PG&E received a total of 129 offers from 46 developers. The received offers are broken down into the following categories:

- Baseload, seven offers, five offers and 2 offer variations, for a total offered capacity of 84.5 MW;
- As Available Non-Peaking, 23 offers, 14 offers and 9 offer variations, for a total offered capacity of 180.1 MW; and
- As Available On-Peak, 99 offers, 80 offers and 19 offer variations, for a total offered capacity of 1,281.7 MW.

PG&E eliminated two offers as non-conforming in the As Available Peak category.

Resolution E-4582 defines the selection process. "Each product is selected on the basis of price, least expensive first until the capacity limit in each solicitation is reached; IOU may normalize (adjust) bids to place bids on an equivalent basis before making least cost selection using method approved, if any, in the advice letter implementing RAM; IOUs should add the estimated transmission upgrade costs to the bids for ranking purposes." PG&E compared offers based on their levelized post-TOD price per megawatt hour ("\$/MWh"), including transmission adders, RA value, and Adjusted RA. Each offer provided a price and generation profile.

In addition to price, Resolution E-4582 authorizes PG&E to use a seller concentration limit of 20 MW per seller per auction.

In the Baseload category, PG&E did not select any baseload products. PG&E did consider one alternative portfolio that included 20 MW of Baseload capacity. This alternative was rejected on the basis of economics. The inclusion of one Baseload category offer increased PG&E average total cost by [REDACTED].

In the Baseload category, Mr. Adkins agrees with PG&E's decision to not include any baseload projects on the basis of economics. Mr. Adkins' review of the Baseload category confirms PG&E's assessment. Following the August PRG Meeting, Mr. Adkins was asked by the PRG to investigate the process for obtaining Baseload category offers.

PG&E receives Baseload Category offers through a public solicitation. First, each proposal is screened for meeting the minimum threshold requirements. Each bidder provides a pre-TOD ("Time of Delivery") price. PG&E then applies standard TOD adjustments to the price to arrive at a post-TOD price. The process for applying the TOD adjustments are clearly defined in the Solicitation protocols. Next, PG&E adds transmission cost taken from the applicable study. Finally, PG&E adjusts the price to reflect resource adequacy requirements resulting in the Total Cost, to be used for comparison.

In the selection process, PG&E has a defined Baseload Category target 10.0 MW. At PG&E's discretion, PG&E may procure up to 20 MW more or less. Translated, PG&E may anywhere from 0 MW to 30.0 MW. PG&E selected no Baseload Category offers.

From a process standpoint, PG&E has conducted this evaluation within the guidelines of the solicitation. From an economic perspective, PG&E rejected the Baseload Category offers because the most competitive Baseload Category offer was higher in cost than both the As-Available Non-Peaking and As-Available Peaking Categories. The most competitive Baseload offer was [REDACTED] \$/MWh. The recommended proposal for the As-Available Non-Peaking category was [REDACTED] \$/MWh. The Baseload offer was [REDACTED] % higher. In addition, the highest cost proposal from the As-Available Non-Peaking category was [REDACTED] \$/MWh. The Baseload offer was [REDACTED] % higher. The lowest cost proposal for the As-Available Peaking category was [REDACTED] \$/MWh. The Baseload offer was [REDACTED] % higher. In addition, the highest cost proposal from the As-Available Peaking category was [REDACTED] \$/MWh. The Baseload offer was [REDACTED] % higher.



Mr. Adkins finds that PG&E's recommendation is consistent with the procedural requirements and Mr. Adkins finds PG&E's recommendation economically justified. Selecting any Baseload offers will result in undue cost burdens to PG&E ratepayers. Mr. Adkins also found strong economic evidence that competitive pressures are driving down the prices in the As-Available Non-Peaking and As-Available Peaking categories.

In the As-Available Non-Peaking category, PG&E selected the [REDACTED]. PG&E's preferred recommendation is to go with 19.8 MW, which is 9.8 MW above the category target and 10.2 MW below the maximum category target. Adding the next best offer would have resulted in the execution of contracts that were not competitive and/or exceeding the category maximum target. Mr. Adkins agrees with PG&E's recommendation to select the one offer.

In the As-Available On-Peak category, PG&E selected three of the top four proposals for a total of 60 MW which is 2 MW less than the category target of 62 MW. The top two proposals in the As-Available On-Peak category included a base offer and a variation, PG&E elected to select the base offer. PG&E did not include a seller concentration limit, because the implementation of a seller concentration limit would result in higher costs in the As-Available On-Peak category.

Mr. Adkins agrees with PG&E's recommendation to select three offers in the As-Available On-Peak category. Furthermore, Mr. Adkins agrees with PG&E's decision not to enforce the seller concentration limit.

PG&E's targets for the Baseload, As-Available Non-Peaking, and As-Available On-Peak categories were 10 MW, 10 MW, and 62 MW each, plus or minus 20 MW; at PG&E's discretion. PG&E has selected 0 MW from the Baseload category, 19.8 MW from the As-Available Non-Peaking category, and 60 MW from the As-Available On-Peak category. PG&E's total recommended capacity is 79.8 MW. PG&E's recommendation meets all the minimum category requirements for all categories.

Mr. Adkins agrees and supports PG&E's recommendation for all of the categories.

**If applicable, describe safeguards and methodologies employed by the IOU to compare affiliate bids or UOG ownership proposals. If a utility selected a bid from an affiliate or a bid that would result in utility asset ownership, explain and analyze whether the IOU's selection of such bid(s) was appropriate.**

This section is not applicable; PG&E neither expected nor received an affiliate bid.

**Based on the complete bid process, is (are) the IOU contract(s) the best overall offer(s) received by the IOU?**

Yes, Mr. Adkins finds that PG&E's bid solicitation and evaluation process has resulted in identifying and executing the best overall offers received in its RAM RFO.

Mr. Adkins agreed with PG&E's initial selection of the following contracts as the primary offers:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Subsequent to PG&E's notification of selected and back up offers, PG&E experienced numerous difficulties in procuring executed contracts within the As-Available Peak Category. All three of the selected offers in the As-Available Peaking Category declined to go forward with contract execution.

At this stage of the process, PG&E was unable to meet its minimum category in the As-Available Peaking Category. In response, PG&E turned to their back up offers in both the As-Available Peaking Category and the As-Available Non-Peaking Category:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

In addition, five of the seven back-up offers also declined to go forward with contract execution. The primary reason was that the bidders elected to pursue higher contracted prices in other markets. One bidder admitted that they were unable to achieve the pricing that they offered. At this point, PG&E was only able to secure 15.0 MW in the As-Available Peaking Category and 5.5 MW in the As-Available Non-Peaking Category.

	<b>Contracted</b>	<b>Target</b>	<b>Minimum Target</b>
Baseload	0.0 MW	10 MW	0 MW
As-Available Non-Peaking	25.3 MW	10 MW	0 MW
As-Available Peaking	15.0 MW	62 MW	42 MW
<b>Total</b>	<b>40.3 MW</b>	<b>82 MW</b>	<b>42 MW</b>

Concerned with meeting the minimum As-Available Peaking category target of 42 MW, PG&E's only available option was to expand their back up list to include an additional eight proposals.

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Unfortunately, as these offers had been released, seven of the eight had elected to pursue contracts with other utilities. PG&E did execute a contract for an additional 13 MW, bringing their capacity in the As-Available Peak Category to 28.0 MW.

	<b>Contracted</b>	<b>Target</b>	<b>Minimum Target</b>
Baseload	0.0 MW	10 MW	0 MW
As-Available Non-Peaking	25.3 MW	10 MW	0 MW
As-Available Peaking	28.0 MW	62 MW	42 MW
<b>Total</b>	<b>53.3 MW</b>	<b>82 MW</b>	<b>42 MW</b>

As of the writing of this IE advice letter, PG&E has not secured enough capacity to meet its Minimum As-Available Peak Category target. Pursuing additional proposals will only result in higher costs. Mr. Adkins finds no fault with PG&E's protocols or its staff actions. Mr. Adkins agrees with and supports PG&E's actions in this Fourth RAM solicitation.

Following the filing of this IE advice letter, PG&E contacted the next As-Available Peak Category contract [REDACTED] October 30, 2013. The addition of this contract brings the As-Available Peaking category to 48.0 MW which is above the minimum target of 42 MW.

	<b>Contracted</b>	<b>Target</b>	<b>Minimum Target</b>
Baseload	0.0 MW	10 MW	0 MW
As-Available Non-Peaking	25.3 MW	10 MW	0 MW
As-Available Peaking	48.0 MW	62 MW	42 MW
<b>Total</b>	<b>73.3 MW</b>	<b>82 MW</b>	<b>42 MW</b>

Mr. Adkins agrees with and supports PG&E's actions to achieve the minimum category targets in this Fourth RAM solicitation.

**If the contract does not directly reflect a product solicited and bid in an RFO, is the contract superior to the bids received on the products solicited in the RFO? Explain.**

Not applicable, the requirement of Resolution E-4582 states that no negotiations are allowed for non-price terms and conditions. PG&E's contracts are directly related to the products solicited and received by PG&E.

**Is the contract a reasonable way of achieving the need identified in the RFO?**

Yes, the stated objective of Resolution E-4582 was "to lower transaction costs and promote the development of supply-side renewable distributed generation". The CPUC implemented a standard purchase power agreement for PG&E. No negotiations are allowed for the non-price terms and conditions. Mr. Adkins finds PG&E's standard contract sufficient to achieve the needs stated in the RAM RFO. Furthermore, Mr. Adkins reviewed the recommended contracts and found the implementation consistent with the Bidder's proposed intent and consistent with the rules of the RAM RFO.

**Based on your analysis of the RFO bids, the bid process, and the overall market, does the contract merit Commission approval? Explain.**

Yes, PG&E has conducted a thorough solicitation and evaluation consistent with the rules identified in Resolution E-4582. The role of PG&E's Independent Evaluator is to assess the competitiveness and integrity of the RAM RFO. There are two aspects involved in assessing the competitiveness of the RAM RFO. The abstract quality of competition is related to the depth and texture of willing market participants in each of the categories. Mr. Adkins was satisfied with the depth of willing market participants in all categories, based on past experience. Mr. Adkins found that the RAM RFO solicitation and the public outreach were sufficient to notify all available market participants. The second aspect of assessing the competitiveness of the RAM RFO is observing the practical RFO solicitation and evaluation activities and determining if they demonstrate a fair contest. Mr. Adkins has found that PG&E's RFO solicitation and evaluation activities were fair and provided no undue bias to any individual bidder. Mr. Adkins further finds that PG&E's RAM RFO solicitation and evaluation activities were conducted in accordance with the complete rules set forth in Resolution E-4582.

**Based on the complete bid process, should some component(s) be changed to ensure future RFOs are fairer or provide a more efficient, lower cost option?**

No. Mr. Adkins believes that this fourth RAM RFO continues to operate efficiently. In response to the PRG's concerns regarding the competitiveness of the Baseload Category. PG&E could investigate additional potential bidders for its next RAM RFO. However, Mr. Adkins does not believe this action will materially affect the competitiveness of the Baseload Category. In response to the issue of bidders refusing to go forward with contracting, Mr. Adkins believes the only action available to PG&E is to expand their list of back-up proposals.

## **Public Appendix G**

### **Summary of Solicitation Participation**

**APPENDIX G**

**Names of participating companies and the number of offers per company**

indicates winning counterparty  
 Additional winning counterparty

<b>CONFORMING OFFERS</b>		
<b>item:</b>	<b>Developers</b>	<b>Number of Offers Submitted</b>
1	8minutenergy Saferay Holding 1LLC	1
2	Adera Solar, LLC (Pacific Valley)	1
3	AES Tehachapi Wind, LLC	2
4	Altamont Winds	2
5	Brookfield Renewable Energy Partners (coram)	2
6	Bull Moose Energy, LLC	1
7	CaWind Resources, Incorporated	2
8	EC&R NA Solar PV, LLC	2
9	EDF Renewable Development, Inc.	9
10	EDP Renewables North America LLC	1
11	Element Power US, LLC	1
12	Energy Development & Construction Corporation	3
13	Eurus Energy America LLC	1
14	First Solar	10
15	Frontier Renewables LLC / Activ Solar GmbH	6
16	GCL-SR LLC	2
17	Gestamp Asetym Solar North America, Inc.	5
18	Gradient Resources Inc.	1
19	Greenleaf Power	3
20	Hanwha Q Cells USA Corp. ("Q Cells")	1
21	Helios Renewables LLC / Canadian Solar (USA) Inc	2
22	Infigen	2
23	Montauk Energy	1
24	Native American Energy Resources, LLC	1
25	New Dimension Energy Company, LLC	3
26	NextEra Energy Resources, LLC	6
27	Northbrook Energy	2
28	Northlight Power, LLC	2
29	NRG Solar	2
30	Pristine Sun, LLC	3
31	Recurrent Energy	8
32	Ridgeline Energy LLC	1
33	Sempra U.S. Gas and Power	1
34	Sierra Power Corporation	1
35	Silverado Power	21
36	SKIC Solar, LLC	1
37	Solar Electric Solutions, LLC	1
38	Solar Projects Solutions, LLC	1
39	SolarReserve, LLC	1
40	SRPV, LLC	1
41	SunEdison	2
42	Terra-Gen Development Co.	3
43	Trina Solar US Development	1
44	W Power, LLC	1
45	WDG Capital Partners I, LP	2
46	Windland, Inc.	1
		127
<b>NON CONFORMING (did not pass viability screen)</b>		
1	First Solar	2
<b>Total Non Conforming</b>		<b>2</b>
<b>Total Offers</b>		<b>129</b>

<b>CONFORMING OFFERS</b>				
Baseload Product Category				
Item No:	Counterparty	ERR Type	Contract Capacity (MW)	Annual Generation (GWh)
1	Bowerman Power LFG, LLC	Landfill Gas	20.0	159.2
2	Sierra Power Corporation	Biomass	6.0	54.8
3	Gradient Resources, Inc.	Geothermal	20.0	162.6
4	Thermal Energy Development Partnership, LP	Biomass	18.5	134.6
5	Bull Moose Energy, LLC	Biomass	20.0	157.7
6	Thermal Energy Development Partnership, LP	Biomass	18.5	134.6
7	Thermal Energy Development Partnership, LP	Biomass	18.5	134.6
<b>7</b>	<b>Total Baseload</b>		<b>84.5</b>	<b>668.9</b>

As Available Off-Peak				
Item No:	Counterparty	ERR Type	Contract Capacity (MW)	Annual Generation (GWh)
1	Rising Tree Wind Farm LLC	Wind	19.8	68.9
2	EDF-RE	Wind	19.8	71.2
3	STS HydroPower, Ltd.	Hydro	5.5	13.3
4	AES TEHACHAPI WIND, LLC	Wind	14.7	31.5
5	New Dimension Energy Company, LLC	Wind	16.0	47.1
6	STS HydroPower, Ltd.	Hydro	5.5	13.3
7	AES TEHACHAPI WIND, LLC	Wind	8.0	18.9
8	New Dimension Energy Company, LLC	Wind	7.7	22.7
9	New Dimension Energy Company, LLC	Wind	8.2	24.4
10	Cameron Ridge, LLC	Wind	12.7	35.9
11	Altamont Winds Inc.	Wind	20.0	45.1
12	Windland Refresh, LLC	Wind	7.8	20.1
13	Clearvista Energy, LLC	Wind	10.0	22.4
14	Cameron Ridge, LLC	Wind	12.7	35.8
15	Altamont Winds Inc.	Wind	10.0	22.8
16	Clearvista Energy, LLC	Wind	10.0	22.4
17	Coram Energy, LLC	Wind	7.5	26.1
18	Coram Energy, LLC	Wind	7.5	26.1
19	Energy Development & Construction Corporation	Wind	12.0	32.9
20	CalWind Resources, Incorporated	Wind	16.2	46.4
21	CalWind Resources, Incorporated	Wind	16.2	46.4
22	Energy Development & Construction Corporation	Wind	12.0	32.4

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23	Energy Development & Construction Corporation	Wind	12.0	32.0
23	<b>Total As Available Off-Peak</b>		<b>180.1</b>	<b>508.0</b>

As Available On-Peak				
Item No:	Counterparty	ERR Type	Contract Capacity (MW)	Annual Generation (GWh)
1	87RL 8ME LLC	PV	15.0	32.9
2	Adelanto Greenworks A LLC	PV	4.0	11.0
3	Adera Solar, LLC	PV	20.0	42.2
4	Alta Solar B2, LLC	PV	20.0	51.8
5	Arco Solar 1, LLC	PV	20.0	48.5
6	Aspiration Solar D LLC, Aspiration Solar E LLC, Citizen Sol	PV	20.0	47.6
7	Aspiration Solar E LLC	PV	20.0	47.6
8	Aspiration Solar G LLC	PV	9.0	22.0
9	BAR 13 Solar, LLC.	PV	18.0	54.9
10	Blackwell Solar Park, LLC	PV	20.0	48.2
11	Blackwell Solar Park, LLC	PV	20.0	48.2
12	Blackwell Solar Park, LLC	PV	20.0	48.2
13	Citizen Solar C LLC	PV	20.0	47.6
14	Citizen Solar D LLC	PV	20.0	47.6
15	Clearvista Energy, LLC	PV	5.0	10.6
16	EC&R NA Solar PV, LLC	PV	18.0	52.1
17	EC&R NA Solar PV, LLC	PV	20.0	51.6
18	EDF Renewable Energy, INC	PV	20.0	56.9
19	EDF Renewable Energy, INC	PV	20.0	56.9
20	EDF Renewable Energy, INC	PV	20.0	56.9
21	EDF Renewable Energy, INC	PV	20.0	57.7
22	EDF Renewable Energy, INC	PV	20.0	58.9
23	EDF Renewable Energy, INC	PV	8.0	19.8
24	EE Kettleman Land LLC	PV	20.0	48.7
25	EE Kettleman Land LLC	PV	20.0	48.7
26	EE Stratford Land LLC	PV	20.0	51.5
27	Element Power US, LLC	PV	20.0	49.0
28	First Solar Development, LLC or an affiliate	PV	20.0	47.6
29	First Solar Development, LLC or an affiliate	PV	20.0	47.6



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30	GASNA 6P, LLC	PV	20.0	47.5
31	GASNA 6P, LLC	PV	20.0	47.5
32	GCL-SR	PV	18.0	43.7
33	GCL-SR	PV	15.8	39.5
34	Gestamp Asetym Solar North America, Inc.	PV	20.0	47.5
35	Gestamp Asetym Solar North America, Inc.	PV	20.0	47.5
36	Gestamp Asetym Solar North America, Inc.	PV	20.0	47.5
37	Gettysburg Solar, LLC	PV	20.0	49.7
38	Gettysburg Solar, LLC	PV	20.0	49.7
39	Giffen Solar Park, LLC	PV	20.0	47.3
40	Giffen Solar Park, LLC	PV	20.0	47.3
41	Giffen Solar Park, LLC	PV	20.0	47.3
42	Joshua Tree Solar Farm, LLC	PV	20.0	58.0
43	Joshua Tree Solar Farm, LLC	PV	20.0	58.0
44	Kingbird Solar, LLC	PV	20.0	54.8
45	Kingbird Solar, LLC	PV	20.0	54.8
46	Kingbird Solar, LLC	PV	20.0	54.8
47	Kingbird Solar, LLC	PV	20.0	54.8
48	Little Rock Solar, LLC.	PV	4.6	13.5
49	Lovern Solar Holding LLC	PV	20.0	45.0
50	Native American Energy Resources, LLC	PV	18.3	35.3
51	NLP Granger A82 LLC	PV	5.0	12.2
52	NLP Porter Ranch G18 LLC	PV	6.0	16.1
53	NRG Solar Blythe II LLC	PV	20.0	60.4
54	NRG Solar Oasis LLC	PV	20.0	64.7
55	Portal Ridge Solar, LLC	PV	15.0	36.9
56	Portal Ridge Solar, LLC	PV	20.0	49.2
57	Portal Ridge Solar, LLC	PV	15.0	36.9
58	Portal Ridge Solar, LLC	PV	20.0	49.2
59	RE Antelope LLC	PV	20.0	29.8
60	RE Clearwater LLC	PV	20.0	57.8
61	RE Clearwater LLC	PV	20.0	57.8
62	RE Columbia Two LLC	PV	15.0	43.0
63	RE Columbia Two LLC	PV	15.0	43.0
64	RE Grangeville LLC	PV	20.0	51.6
65	RE Lincoln LLC	PV	12.0	30.8
66	RE Lincoln LLC	PV	12.0	30.8

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67	Ridgeline Energy LLC	PV	20.0	49.2
68	Rio Bravo Solar I, LLC	PV	20.0	51.2
69	SEPV Mojave West, LLC	PV	20.0	57.9
70	SGS Antelope Valley Development, LLC	PV	20.0	52.6
71	Silverado Power	PV	9.0	24.9
72	Silverado Power LLC	PV	20.0	50.7
73	Silverado Power LLC	PV	5.0	13.8
74	Silverado Power LLC	PV	7.0	19.2
75	Silverado Power LLC	PV	20.0	50.7
76	Silverado Power LLC	PV	14.0	38.7
77	Silverado Power LLC	PV	5.0	13.8
78	Silverado Power LLC	PV	20.0	47.2
79	Silverado Power LLC	PV	20.0	47.2
80	Silverado Power LLC	PV	5.0	12.1
81	Silverado Power LLC	PV	4.0	11.1
82	Silverado Power LLC	PV	5.0	13.8
83	Sirius Solar, LLC	PV	20.0	52.4
84	Sirius Solar, LLC	PV	20.0	52.4
85	SKIC Solar, LLC	PV	10.0	24.7
86	SPS Atwell Island West, LLC	PV	20.0	42.6
87	SRPV, LLC	PV	9.0	25.8
88	Three Rocks Solar LLC	PV	13.0	33.4
89	Victorville Landfill Solar, LP	PV	10.0	27.6
90	Wellhead Renewable Energy, LLC	PV	3.0	7.6
91	Western Antelope Blue Sky Ranch A LLC	PV	20.0	50.7
92	Western Antelope Dry Ranch LLC	PV	10.0	25.4
93	Westside Solar, LLC (for mailing purposes: c/o NextEra E	PV	20.0	52.9
94	Westside Solar, LLC (for mailing purposes: c/o NextEra E	PV	20.0	52.9
95	Wildwood Solar II, LLC	PV	15.0	36.3
96	Wistaria Ranch Solar, LLC	PV	20.0	53.2
97	Zodiac Solar LLC	PV	20.0	50.2
<b>97</b>	<b>Total As-Available On-Peak</b>		<b>1,270.7</b>	<b>3,241.2</b>

<b>127</b>	<b>Total Conforming Offers Received</b>		<b>1,535.3</b>	<b>4,418.1</b>
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**NON CONFORMING OFFERS (Offer(s) that did not meet viability screen)**

	Counterparty	ERR Type	Contract Capacity (MW)	Annual Generation (GWH)	Reason
2	Cielo Del Sol, LLC	PV	11.0	32.1	Interconnection Issues

129	Total Offers Received		1,546.3	4,450.2
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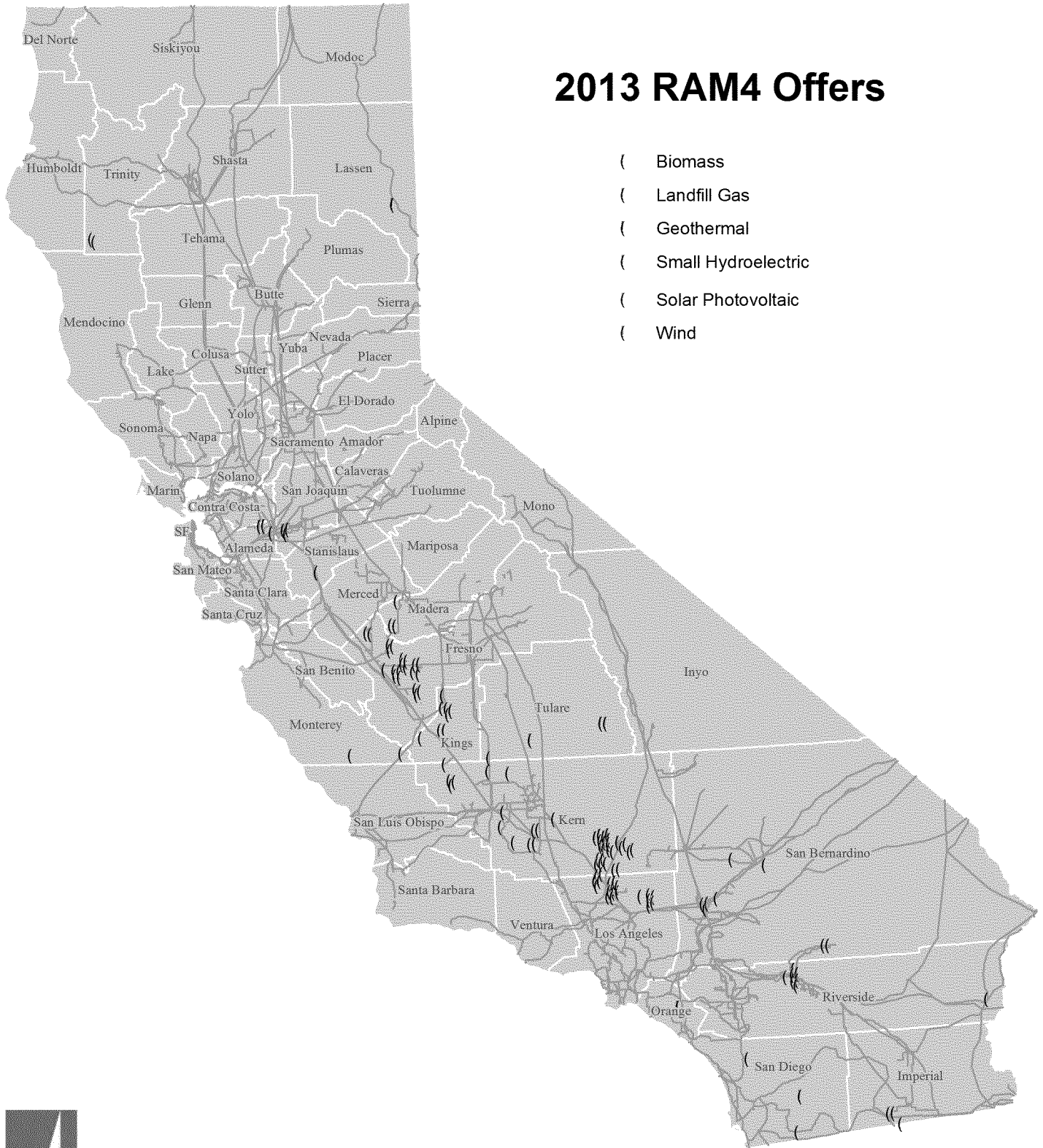
**Note:** The MW totals and annual GWh for each product category do not include project variations.

## **Public Appendix H**

### **Location of Bids**

# 2013 RAM4 Offers

- ( Biomass
- ( Landfill Gas
- ( Geothermal
- ( Small Hydroelectric
- ( Solar Photovoltaic
- ( Wind



Ext4 (GIS Unit) 7/12/2013 E:\Current\_Workspace\RAM4\_2013\overview.mxd

PG&E Gas and Electric  
Advice Filing List  
General Order 96-B, Section IV

1st Light Energy	Douglass & Liddell	OnGrid Solar
AT&T	Downey & Brand	Pacific Gas and Electric Company
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	Praxair
Anderson & Poole	G. A. Krause & Assoc.	Regulatory & Cogeneration Service, Inc.
BART	GenOn Energy Inc.	SCD Energy Solutions
Barkovich & Yap, Inc.	GenOn Energy, Inc.	SCE
Bartle Wells Associates	Goodin, MacBride, Squeri, Schlotz & Ritchie	SDG&E and SoCalGas
Braun Blasing McLaughlin, P.C.	Green Power Institute	SPURR
CENERGY POWER	Hanna & Morton	San Francisco Public Utilities Commission
California Cotton Ginners & Growers Assn	In House Energy	Seattle City Light
California Energy Commission	International Power Technology	Sempra Utilities
California Public Utilities Commission	Intestate Gas Services, Inc.	SoCalGas
California State Association of Counties	K&L Gates LLP	Southern California Edison Company
Calpine	Kelly Group	Spark Energy
Casner, Steve	Linde	Sun Light & Power
Center for Biological Diversity	Los Angeles Dept of Water & Power	Sunshine Design
City of Palo Alto	MRW & Associates	Tecogen, Inc.
City of San Jose	Manatt Phelps Phillips	Tiger Natural Gas, Inc.
Clean Power	Marin Energy Authority	TransCanada
Coast Economic Consulting	McKenna Long & Aldridge LLP	Utility Cost Management
Commercial Energy	McKenzie & Associates	Utility Power Solutions
County of Tehama - Department of Public Works	Modesto Irrigation District	Utility Specialists
Crossborder Energy	Morgan Stanley	Verizon
Davis Wright Tremaine LLP	NLine Energy, Inc.	Water and Energy Consulting
Day Carter Murphy	NRG Solar	Wellhead Electric Company
Defense Energy Support Center	Nexant, Inc.	Western Manufactured Housing Communities Association (WMA)
Dept of General Services	North America Power Partners	
Division of Ratepayer Advocates	Occidental Energy Marketing, Inc.	