



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking to Continue
Implementation and Administration of California
Renewables Portfolio Standard Program

Rulemaking 08-08-009
(Filed August 21, 2008)

**SILVERADO POWER'S REQUEST FOR MODIFICATION OF
DECISION 10-12-048 ADOPTING THE RENEWABLE AUCTION
MECHANISM**

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Pursuant to Rule 16.4 of the Commission’s Rules of Practice and Procedure, Silverado Power (“Silverado”) respectfully petitions the Commission for modification of Decision 10-12-048 Adopting the Renewable Auction Mechanism (“RAM”) in accordance with the proposals set forth below.

Silverado Power is a utility-scale developer of solar projects, with over 600 megawatts (“MW”) of power under development in California and beyond. Silverado intends to participate in the RAM and is interested in ensuring the long-term success of the market for wholesale-distributed generation in California.

I. BACKGROUND

On December 17, 2010, the Commission issued Decision 10-12-048 adopting the RAM. The Decision sets forth an auction process for the procurement of renewable power from projects 20 MW or less. It requires that the three major investor-owned utilities (“IOUs”) procure 1,000 MW of power over a two-year period, holding two auctions per year.¹ The decision imposes four project viability criteria, requiring: 1) demonstration of site control upon bid submission, 2) demonstration of developer experience, 3) deployment of a commercialized technology, and 4)

¹ D.10-12-048 at 87.

the filing of an interconnection application by the time of bid submission.² To remain RAM eligible, the decision requires that projects begin commercial operation within 18-months of contract execution, with the option of one 6-month extension for regulatory delays.³ The decision allows an IOU to reject bids “if it determines that one or more bids are not cost competitive or if there is evidence of market manipulation.”⁴

Silverado is concerned that the RAM process outlined above sets up a restricted, imperfect market that will lead to uncompetitive auctions that favor older, sub-optimal projects that were not previously selected in past competitive solicitations. Silverado also believes that recent changes in the California Independent System Operator’s (CAISO) interconnection process have not been appropriately taken into account in structuring the RAM, and due to current transmission build schedules, many of the best projects in California will be ineligible for RAM auctions. In order to ensure that the RAM is a functional procurement process for developers, ratepayers and utilities, Silverado respectfully seeks modification of the decision to better conform the RAM procurement process to current realities in California. Specifically, we seek to align RAM auctions with the interconnection process and with planned transmission upgrades in California by changing the number of auctions per year and by changing the requirement that projects be commercially operational within 18 months. We believe that changing the COD requirement from 18-months to 24-months will ensure that there is a competitive solicitation that allows for participation by new, optimally sited projects. Silverado believes this will result in lower cost to ratepayers and a more efficient market. Furthermore, we propose that projects bidding into the first auction have until at least December 31, 2013 to reach

² *Id.* at 91.

³ *Id.* at 90.

⁴ *Id.* at 89.

COD, with one extension of up to 6 months for regulatory delays or interconnection build delays, in order to allow for certain approved network upgrades to come online, which allows projects in many of the sunniest areas in California to participate. Finally, we seek to align RAM auctions with the newly approved CAISO interconnection procedures to minimize gaming and speculation.

II. AN UNCOMPETITIVE AUCTION DOES NOT SERVE THE COMMISSION, UTILITIES OR RATEPAYER INTERESTS

Silverado understands and is in complete alignment with the Commission's goal of developing a procurement mechanism for renewable power that will achieve competitive pricing while also ensuring that projects get built expeditiously, with low contract failure rates, and overall administrative efficiency. We are concerned, however, that some of the program elements designed to help achieve those goals will have unintended consequences that will increase overall costs and undermine those very same goals. As will be explained further below, we believe that the failure to coordinate auctions with the interconnection process will unnecessarily screen out a large number of viable projects, resulting in uncompetitive auctions with overall project bids that are higher than otherwise could be achieved with a process that better integrates procurement with interconnection.

A. THE NEWLY REFORMED INTERCONNECT PROCESS WILL TAKE OVER 500 DAYS TO COMPLETE, MAKING NEW PROJECTS INELIGIBLE FOR THE RAM

On the same day that the RAM decision was issued, the Federal Energy Regulatory Commission ("FERC") approved the CAISO's suggested reforms to its Small Generator

Interconnection Procedures (“SGIP”).⁵ This approval merges virtually all interconnection applications into one yearly “cluster study” process, as opposed to the serial study process previously in place for small generators. Since the new CAISO process was approved, Southern California Edison (“SCE”) and Pacific Gas & Electric (“PG&E”) have undertaken processes for reforming their SGIPs and are proposing to mirror the CAISO cluster study timelines.⁶ Though the utilities have not yet finalized their modifications, both have said that their timelines for the cluster studies will be identical to those in the CAISO tariff. While the cluster study approach offers a number of improvements over the preexisting study process, it has two major drawbacks that are relevant here: it takes over 18-months to complete and it occurs only once per year.

Counting from the very last day that an interconnection customer could submit an application and participate in a cluster, the process from submittal of an application to the signing of an interconnection agreement will take roughly 17 to 19 months. This does not include the time it will take for interconnection facilities to be constructed. Construction can take up to a year or more to complete depending on the extent of necessary modifications. The 17 to 19 month timeframe to an interconnection agreement also does not take into account waiting for the annual cluster window; it assumes that applications will be filed on the exact last day the window is open. Applications that miss this window will have to wait a full year for the next cluster,

⁵ 133 FERC ¶ 61,223, December 16, 2010. The latest version of the CAISO tariff can be found here: <http://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=12537358>.

⁶ Neither SCE nor PG&E has submitted their proposed modifications to their SGIP to FERC yet. Thus, the references herein will be to the latest drafts issued by each utility. SCE’s second draft is dated 2/04/2011 and is available at:

http://asset.sce.com/Regulatory/Open%20Access%20Information%20-%20WDAT/SCE_WDAT_GIP_SecondDraftPosted020411.pdf. PG&E’s draft was released on January 14, 2011 and is available at: http://www.pge.com/includes/docs/word_xls/b2b/newgenerator/wholesalegenerators/WDT_SGI_P_draft.doc.

resulting in a time of 29 to 31 months to get an interconnection agreement, not counting the additional time needed for the construction of interconnection facilities.

The intent of these reforms is to ensure that virtually all projects are studied at the same time, and thus the two alternatives to this process are only accessible to a very limited number of projects.⁷ The first alternative is the Fast Track process. Projects interconnecting to the CAISO transmission system under the Fast Track process will have to be sized under 5 MWs and will have to pass six screens designed to identify projects that will have virtually no grid impacts and therefore can be interconnected without additional study.⁸ Projects interconnecting on utility distribution grids will likely have an even more restrictive size limit (2 MWs for most circuits) and will face similar screens.⁹ It is not known how many projects will be able to pass the screens, but historically the process has not been heavily used except for rooftop systems or systems located where there is an existing retail service.

The second alternative is the Independent Study Process (“ISP”) which allows projects that are “electrically independent” from other projects in the queue to proceed through a faster study process. However, for the CAISO ISP process, only projects that already have a COD will be eligible.¹⁰ Since projects under the RAM will not have their COD until a power purchase agreement is signed, and the RAM decision requires that interconnection applications have been filed by the time bids are submitted,¹¹ developers cannot use the ISP process adopted by CAISO. Although the modifications that PG&E and SCE have proposed to their SGIPs have eliminated

⁷ The tariffs also contain a third option for inverter projects 10 kw or smaller, since projects of this size are unlikely to bid into the RAM this process will not be discussed herein.

⁸ CAISO Tariff sections 5.1 and 5.3.

⁹ PG&E’s draft allows for projects up to 2 MWs on their 12kV lines, 3 MWs on their 21kV lines, and 5 MWs on all other lines, *see* PG&E Draft section 2.1. Projects in SCE’s territory will be subject to a 2 MW limit, *see* SCE Draft section 1 at page 9.

¹⁰ CAISO Tariff at 4.1.1.

¹¹ D.10-12-048 at 68 and 91.

the COD eligibility requirement,¹² there are over 40 GWs currently in IOU interconnection queues, so the likelihood that potential RAM projects will be electrically independent may be small. Moreover, this backlog of applications means that it may take some time to complete interconnection studies for ISP projects. Accordingly, Silverado Power does not feel that the ISP processes is a realistic option for the majority of projects wishing to participate in the RAM.

In light of these new interconnection realities, the pool of projects that could bid into the first, and possibly subsequent, auctions could be quite limited. As described above, projects that go through the new cluster study process will have difficulty meeting the 18 month COD requirement from contract approval even if they make it into the first cluster study, which is unlikely given that the first cluster window closes in less than 2 months. As a result, the limited pool of projects that will be able to participate in RAM auctions will largely be those that have been under development for a considerable amount of time but that have not won a power purchase agreements in prior solicitations. This pool will be heavily skewed towards legacy projects that did not have a sufficiently low enough price to be awarded a contract in prior solicitations, resulting in less competitive RAM auctions, higher RAM prices, and a potential windfall for developers with otherwise uncompetitive projects.

Another significant problem that the currently approved RAM program raises is that projects seeking to connect to the East Kern Wind Resource Area (EKWRA) 66kV Reconfiguration Project will not be able to participate because they will not be able to come online prior to December of 2013. This is a major upgrade in a prime location for solar resources. Excluding these projects from the RAM (by requiring commercial operation within 18-months) will eliminate many of the most attractively priced projects from the program.

¹² PG&E Draft at 3.1; SCE Draft at 5.4.

Finally, looking beyond the interconnection process, there are a number of other hurdles that a developer may face that make an 18-month COD requirement with one 6-month extension excessively risky. In particular, it is quite likely that California Environmental Quality Act review of ground-mounted projects will take up to a year or more to complete for some projects. For projects approaching the 20MW size, it will be necessary to give sufficient time for legitimate environmental concerns to be addressed in order to avoid the potential for costly and time-consuming litigation. The 18 month COD requirement that is presently included in the RAM decision will not allow many of these projects to participate, which will further limit the pool of competitively priced projects.

Assuming the CAISO is able to meet the lengthy timeframes it has proposed for completing its cluster studies,¹³ projects that participate in the cluster study for 2011 will not have interconnection agreements until November of 2012, and if one assumes between six and twelve months for the construction of upgrades, it will be unrealistic for projects to be commercially operable prior to mid-to-late 2013. Thus, an extension of the 18-month COD window is necessary to enable competitively priced projects to participate in the RAM and to ensure that projects that are selected will remain viable. Without this modification, the RAM auctions are likely to be less competitive as they will screen out most new projects and projects located in some of the most solar-rich resource areas in California.¹⁴

¹³ Since the cluster studies have not yet been conducted in this manner, involving quite so many projects, it is not yet clear whether the estimates provided by the CAISO and utilities are realistic.

¹⁴ One of the Commission's express goals was to create a procurement process for projects up to 20MW in accordance with recommendations from the California Energy Commission. D.10-12-048 at 41. However, since only the Fast Track and ISP processes will be available for newly proposed projects, the RAM may result in a disproportionate number of small projects being approved.

We propose two changes that will make the COD deadline more realistic for developers without sacrificing the Commission's goals. First, we believe the COD window should be extended to 24-months, with the allowance of day-for-day extensions of up to six-months in the case of delays due to the construction of interconnection facilities or regulatory hurdles. This will provide sufficient time to complete the cluster study while also allowing a cushion for delays that are outside developer control. Additionally, the COD requirement should be measured from the time that the Commission approves a contract, not from the date of contract execution. Even if Commission approval is obtained quickly, investors are rarely comfortable moving ahead with major deposits for interconnection facilities if a power purchase agreement has not yet been given regulatory approval. The IOUs each recognized this reality and set commercial operation deadlines in their respective PV programs to begin after Commission approval. Finally, for the first auction, the commercial operation date should be no sooner than December 31, 2013, which is when the EKWRA upgrade is planned to be complete.

Making these modifications may result in projects coming on-line a bit later, but many more projects will be able to compete in the RAM process with fewer contract failures, and at a much lower cost to ratepayers, than will result from the RAM program as currently approved.

B. INTEGRATION OF THE INTERCONNECTION PROCESS WITH THE RAM AUCTIONS WILL REDUCE DELAYS, LOWER COSTS AND RESULT IN A MORE COMPETITIVE PROCESS

Silverado urges the Commission to adopt an auction process that achieves the twin goals of ensuring that projects successfully come online while also ensuring a competitive pool of projects. Specifically, we believe the Commission should modify the RAM decision to allow the utilities to integrate the auction process with interconnection processes by removing the requirement that two auctions be conducted per year.

The PV programs being run by the IOUs provide a good illustration of the importance of integrating interconnection with the bidding process. As learned in the recent Solar PV Program Forum hosted by SCE, the need for coordination of procurement and interconnection was the single largest issue for program participants.¹⁵ SDG&E has attempted to address this issue in its PV program. SDG&E's proposal for implementing its PV program allows for a window of "approximately six months" for interconnection applications to be processed between the short-listing of bids and final bid selection. While this process appears to have been designed for use with SDG&E's WDAT process, which proceeds faster than the cluster study performed by the CAISO or other utilities, it provides an example of how the process could be better integrated.

As there will only be one cluster study conducted per year, we are concerned that holding two auctions a year will result in uneven auctions and introduce a significant potential for gaming of bids submitted into RAM auctions. With the exception of a very limited number of small projects that are able to use Fast Track and IOU ISP processes, most projects submitting bids into any particular auction will be in the same cluster study and therefore will be working on the same development timeframe. Having multiple auctions for the same projects could open up the RAM to gaming whereby developers could submit a higher bid into one auction knowing that they if their bid isn't selected, they will have a second bite at the apple in a subsequent auction competing against a similar pool of projects. At the least, most developers will want to bid into the auction most closely aligns with their realistic COD, which may make one auction much more competitive than the others. This concern is particularly true for the first auction, which will likely occur too early for projects participating in the first cluster study to confidently participate.

¹⁵ See Presentation Slides from SCE's 2010 Solar PV Program Forum, at page 10, 21, 26, and 28, available at <http://www.sce.com/spvp-ipp>.

Following a close look at the timeline for the cluster study process, we believe it is only reasonable to hold one auction per year without risking the introduction of gaming that may increase prices bid into all auctions. To address this problem, we propose that the Commission modify the RAM decision to allow utilities to hold only one auction per year.

III. CONCLUSION

For the reasons stated herein, the Commission should modify D.10-12-048 to extend the deadline for commercial operation in the following ways:

1. It should replace the 18-month deadline with a deadline of 24-months from Commission approval, with the possibility of day-by-day extensions of up to six months for delays due to the construction of interconnection facilities or regulatory delays outside of the control of the developer.
2. For the first auction, it should require that no project be forced to go online prior to December 31, 2013.
3. It should align the RAM auctions with the interconnection process by removing the requirement that IOU's conduct two simultaneous auctions per year. It should direct the IOU's to structure the auctions around the FERC approved interconnection procedures to enable participants to bid once after receiving Phase 1 studies.

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Implementing these three proposed changes will increase the number of projects eligible for the RAM solicitations, ensure a more competitive market, and help reduce the potential for gaming.

Respectfully submitted this February 15, 2011.

/s/ Sky C. Stanfield

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Verifications

I am the attorney for Silverado Power LLC (Silverado); Silverado is absent from the County of Alameda, California where I have my office, and I make this verification for Silverado for that reason; the statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 15, 2011, at Oakland, California.

/s/ Sky C. Stanfield

Sky C. Stanfield

Attorney for Silverado Power LLC

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of this *Silverado Power's Request for Modification of Decision 10-12-048 Adopting the Renewable Auction Mechanism* on all known parties of record in this proceeding by delivering a copy via electronic mail or mailing a properly addressed copy by first-class mail with postage prepaid to each party named in the official service list without an electronic mail address.

I have also sent a hard copy by U.S First Class mail to Administrative Law Judge Anne E. Simon, Administrative Law Judge Burton Mattson, and Commissioner Michael R. Peevey.

Executed on February 15, 2011, at Oakland, California.

/s/ Sky C. Stanfield

Sky C. Stanfield

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