



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

**FILED**  
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Order Instituting Rulemaking to Continue  
Implementation and Administration, and Consider  
Further Development, of California Renewables  
Portfolio Standard Program.

Rulemaking 15-02-020  
(Filed February 26, 2015)

**NOTICE OF ORAL AND WRITTEN EX PARTE COMMUNICATIONS**

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Attorneys for the Solar Energy Industries  
Association and Solar Electric Solutions, LLC

Dated: September 30, 2016

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Pursuant to Rule 8.3 of the Commission’s Rules of Practice and Procedure, the Solar Energy Industries Association (SEIA) and Solar Electric Solutions, LLC (SES) submit this Notice of Oral and Written Ex Parte Communications.

On September 28, 2016, Brandon Smithwood, Manager, California for SEIA and Freeman Hall, President of SES, held a telephone conversation with Ehren Seybert, Advisor to Commissioner Carla Peterman. The call lasted approximately twenty-five minutes. During this conversation Mr. Hall, Mr. Smithwood and Mr. Seybert discussed the status of the Renewable Market Adjusting Tariff (ReMAT) and the Commission’s efforts to revisit the ReMAT program as outlined in the Scoping Memo issued in the proceeding in February 2016. Prior to the telephone call, for the purpose of assisting in the discussion, Mr. Freeman transmitted to Mr. Seybert a copy of a document entitled “Update: ReMAT Program Status” which is appended to this notice.

For a copy of this notice please contact Wendy Peña at 415-392-7900 or [wpena@goodinmacbride.com](mailto:wpena@goodinmacbride.com).

Respectfully submitted this September 30, 2016, at San Francisco, California.

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By  /s/ Jeanne B. Armstrong  
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3619/001/X182357.v2

# **ATTACHMENT**

# Update: ReMAT Program Status

*Solar Electric Solutions, LLC*

*September 2016*

## Status of ReMAT Program Capacity by Product Type and IOU <sup>[1][2][3][4][5][6][7]</sup>

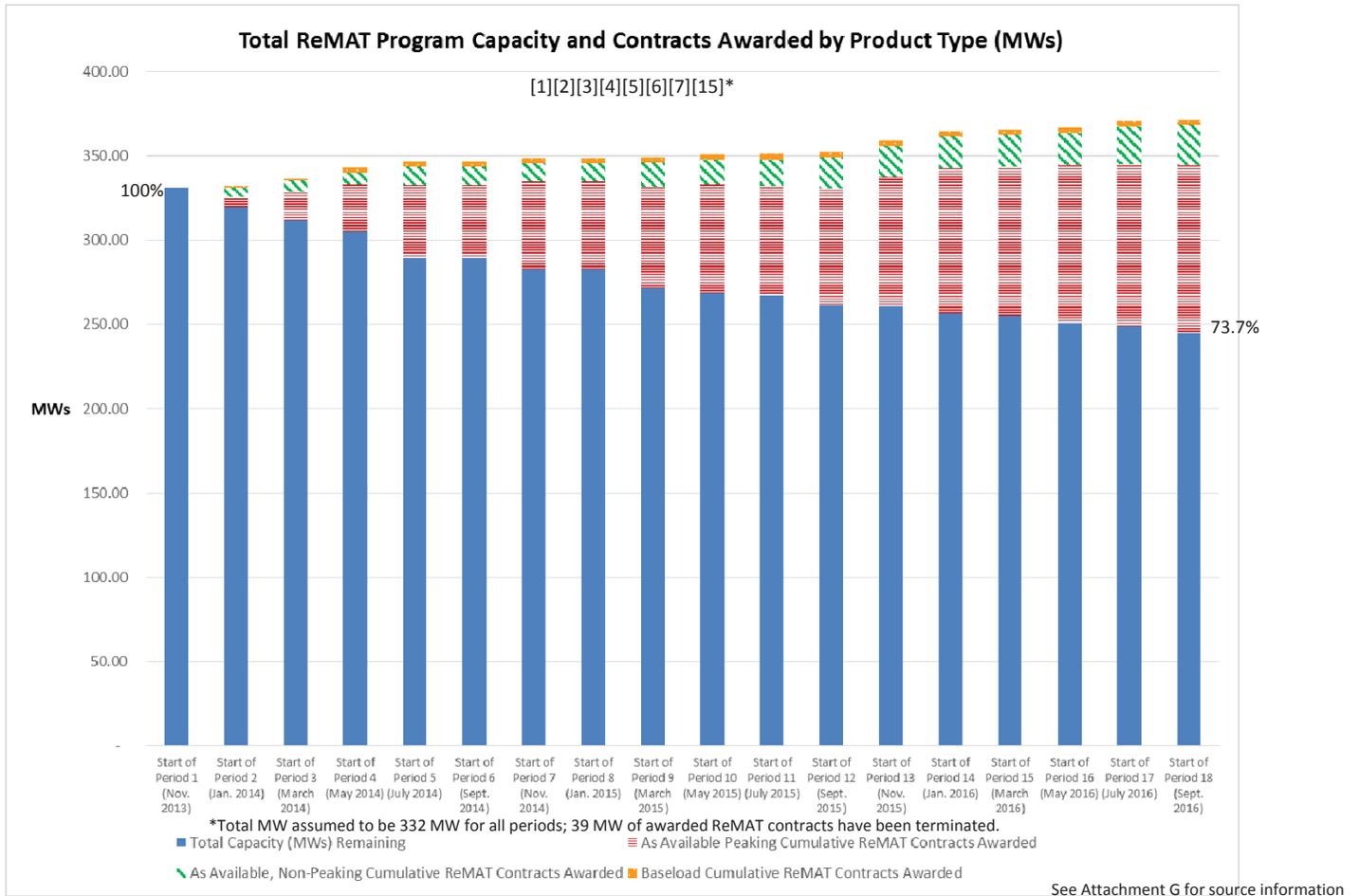
ReMAT Capacity Calculations	Start of Period 18 (Sept. 2016)			Total
	SCE	PGE	SDGE*	
*SDGE terminated their Re-MAT program as of June 30, 2016				
Original Allocation (1)	226.00	218.80	48.80	493.60
Signed CREST Contracts	126.71	108.76	18.80	254.27
Total MWs to Begin ReMAT Program	99.29	110.04	30.00	239.33
CREST Contracts Terminated (2)	40.70	43.06	8.40	92.16
Total MW	139.99	153.10	39.39	332.48
Cumulative ReMAT Contracts Awarded	55.79	53.58	17.18	126.56
ReMAT Contracts Awarded Prior Period	3.00	1.48	-	4.48
Cumulative ReMAT Contracts Terminated	13.59	15.79	9.60	38.99
Total Capacity (MWs) Remaining	97.79	115.31	31.81	244.91
<b>% of Allocation Remaining</b>	<b>70%</b>	<b>75%</b>	<b>81%</b>	<b>73.7%</b>
<b>By Product Type</b>				
<b>Baseload</b>				
Allocation to Begin ReMAT Program	33.10	36.68	10.00	79.78
Allocation of Terminated CREST Contracts	13.57	14.35	2.80	30.72
Total Allocation	46.66	51.03	13.13	110.83
Cumulative ReMAT Contracts Awarded	-	1.00	2.25	3.25
ReMAT Contracts Awarded Prior Period	-	-	-	-
Cumulative ReMAT Contracts Terminated	-	-	-	-
Total Remaining MWs	46.66	50.03	10.88	107.58
<b>% of Allocation Remaining</b>	<b>100%</b>	<b>98%</b>	<b>83%</b>	<b>97%</b>
<b>As Available Non-Peaking</b>				
Allocation to Begin ReMAT Program	33.10	36.68	10.00	79.78
Allocation of Terminated CREST Contracts	13.57	14.35	2.80	30.72
Total Allocation	46.66	51.03	13.13	110.83
As Available, Non-Peaking Cumulative ReMAT Contracts Awarded	9.05	14.78	-	23.83
ReMAT Contracts Awarded Prior Period	-	1.48	-	1.48
Cumulative ReMAT Contracts Terminated	-	-	-	-
Total Remaining MWs	37.61	36.25	13.13	87.00
<b>% of Allocation Remaining</b>	<b>81%</b>	<b>71%</b>	<b>100%</b>	<b>78%</b>
<b>As Available, Peaking</b>				
Allocation to Begin ReMAT Program	33.10	36.68	10.00	79.78
Allocation of Terminated CREST Contracts	13.57	14.35	2.80	30.72
Total Allocation	46.66	51.03	13.13	110.83
As Available Peaking Cumulative ReMAT Contracts Awarded	46.74	37.81	14.93	99.48
ReMAT Contracts Awarded Prior Period	3.00	-	-	3.00
Cumulative ReMAT Contracts Terminated	13.59	15.79	9.60	38.99
Total Remaining MWs	13.51	29.02	7.80	50.33
<b>% of Allocation Remaining</b>	<b>29%</b>	<b>57%</b>	<b>59%</b>	<b>45%</b>
As Available, Peaking Queue Size (3)	31.50			

### Notes:

- (1) D12-05-35, p. 74
- (2) Total Crest Terminated Contracts as of Period 18
- (3) SCE's As Available Peaking Queue Period – 31.5 MW – 10 different applicants with 14 projects.

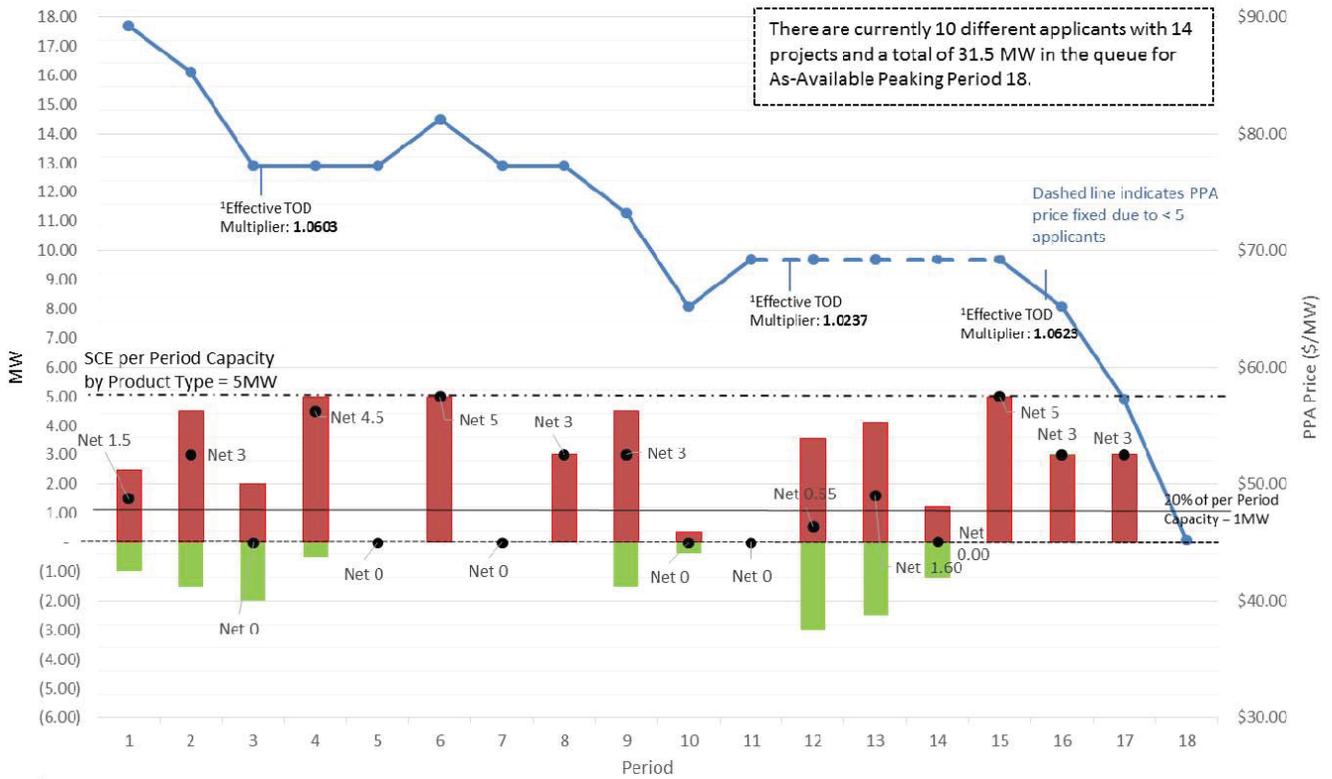
See Attachment G for source information.

74% of ReMAT program capacity is unallocated after 3 years and 18 award periods; the program 's capacity was originally envisioned to be fully awarded after two years.



### SCE's As Available Peaking: Price, Capacity Awarded, & Queue per Period

[5][6]

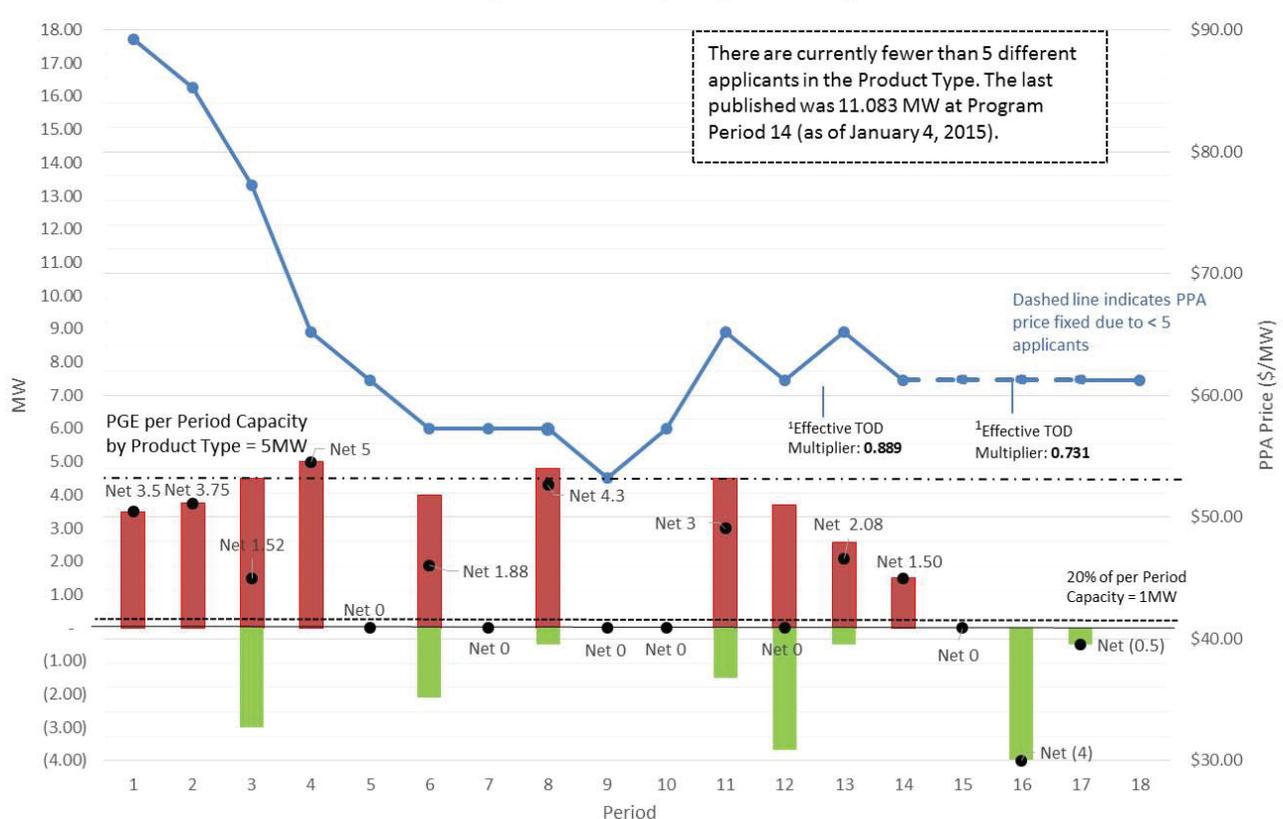


<sup>1</sup>TOD Multiplier represents the effective impact on the nominal PPA price paid to Seller based on the time of delivery of energy from an indicative solar PV project.

■ MW awarded    ■ MW Terminated    ● PPA Price (\$/MWh)    ● Net MW

See Attachment G for source information

### PGE's As Available Peaking: Price and Capacity Awarded per Period <sup>[1][2][3]</sup>



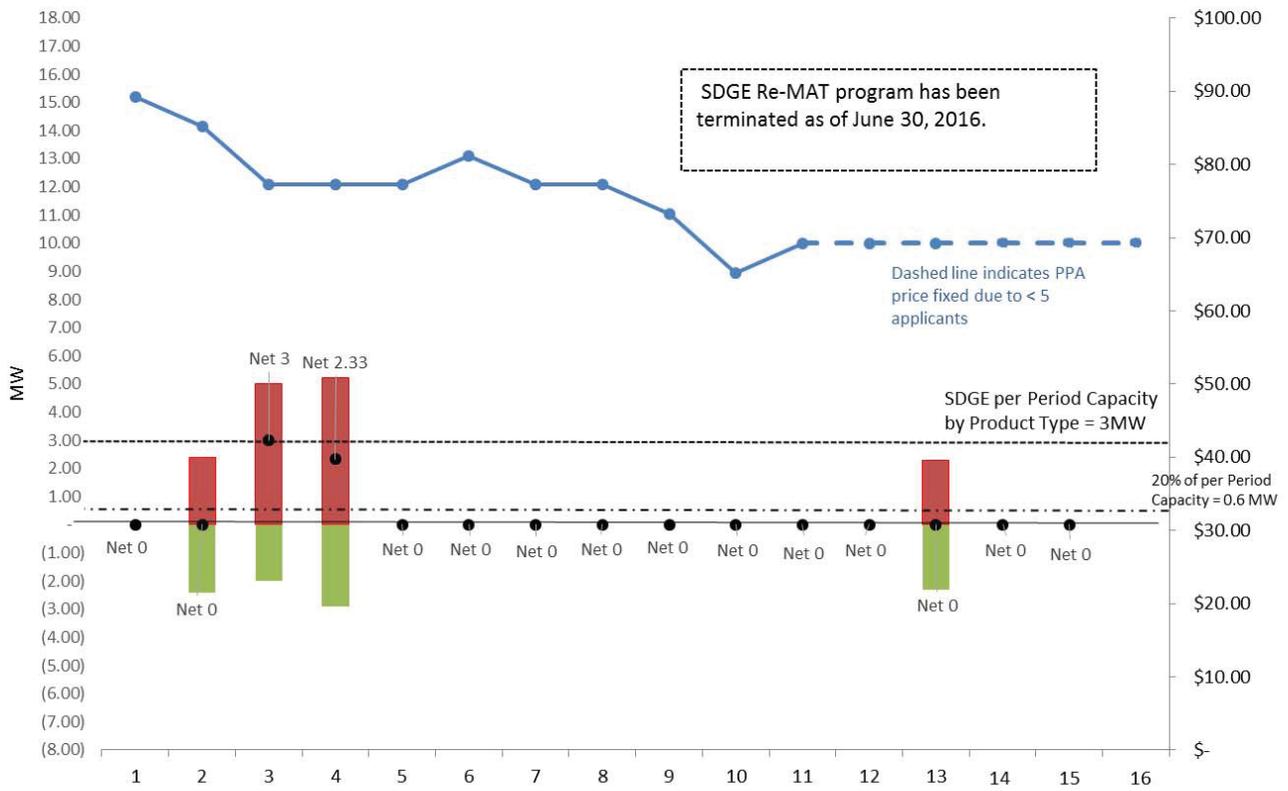
There are currently fewer than 5 different applicants in the Product Type. The last published was 11.083 MW at Program Period 14 (as of January 4, 2015).

Dashed line indicates PPA price fixed due to < 5 applicants

<sup>1</sup>TOD Multiplier represents the effective impact on the nominal PPA price paid to Seller based on the time of delivery of energy from an indicative solar PV project.

- MW awarded
- MW Terminated
- PPA Price (\$/MWh)
- Net MW per Period

### SDGE's As Available Peaking: Capacity Awarded and Net Capacity [4][7]



<sup>1</sup>Where the Facility Size is less than or equal to 5MW of exporting capacity ; Not including: projects Under Construction, In Service

■ MW awarded ■ MW Terminated ● PPA Price (\$/MWH) ● Net MW per Period

See Attachment G for source information

## Appendix A

The entire ReMAT program capacity, whether contracts have been awarded or not, appears to already be counted by IOUs toward their RPS requirements.

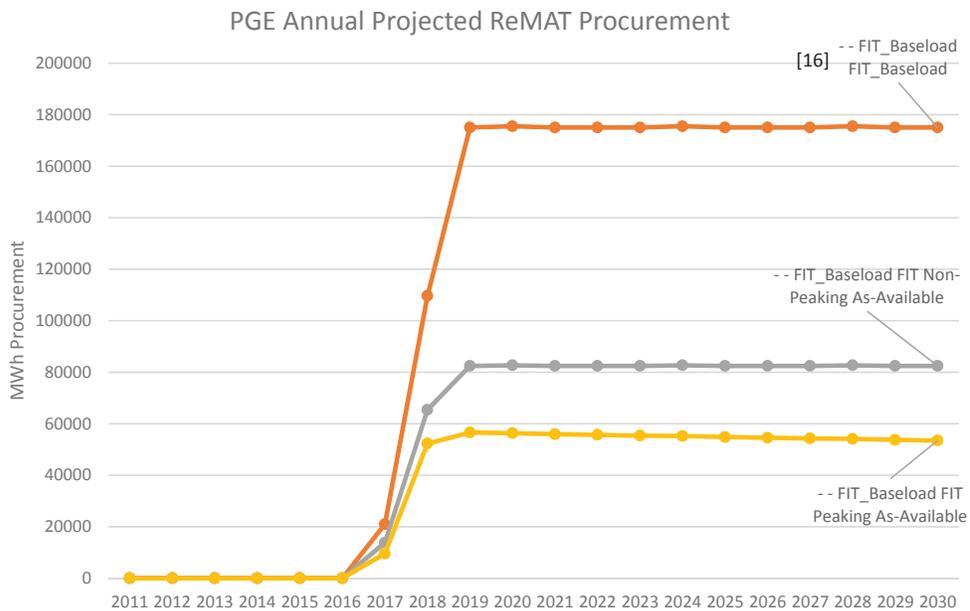
■ SCE appears to already count the entire ReMAT program capacity, whether contracts have been awarded or not, toward its RPS requirements.

“SCE based its forecasted renewable procurement position and need, using both SCE’s assumptions and the Commission’s assumptions...Both forecasts include all projects under contract and assume contracted projects that are currently online will deliver 100% of their expected amount of renewable energy. **Both forecasts also include generation from pre-approved procurement programs (i.e., the Renewable Auction Mechanism, the Renewable Market Adjusting Tariff, and the Solar Photovoltaic Program) at a 100% success rate before contracts are signed.**”  
– SCE 2016 RPS Compliance Report, p.8 [15]

[15] SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) 2011-2013 COMPLIANCE PERIOD 1 VERIFIED AND 2015 PRELIMINARY ANNUAL 33% RENEWABLES PORTFOLIO STANDARD COMPLIANCE REPORT). Southern California Edison, Public Utilities Commission of the State of California, Sept. 2016. Web

PGE appears to already count the entire ReMAT program capacity, whether contracts have been awarded or not, toward its RPS requirements.

“General Assumptions #4: The projects included in this report are from PG&E's executed portfolio (i.e., all contractual obligations entered into), PG&E's utility-owned generation portfolio, **all pre-approved procurement and ownership programs** (i.e., ReMAT, PV Program, and Renewable Auction Mechanism) and future bioenergy procurement legislatively mandated through SB 1122. ; #8: There is no appropriate category among the choices for facility status for generic volumes (FIT, RAM and SB 1122). PG&E chose "online" as the most suitable of the choices.” – PGE RPS Compliance Report, Appendix A-12 [16]



[16] 2015 ANNUAL 33% RPS COMPLIANCE REPORT AND FINAL VERIFIED 2011-2013 RPS COMPLIANCE REPORT OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) (PUBLIC VERSION). Pacific Gas and Electric, Public Utilities Commission of the State of California, Sept. 2016. Web.



## Appendix B

ReMAT Qualifying Projects in each IOU's Interconnection Queue

SCE Interconnection Queue as of July 6, 2016 [10]					
where the Facility Size is less than or equal to 5MW of exporting capacity					
<b>Potential As Available Peak Capacity (MW)</b>	<b>101.8</b>	<b>Potential As Available Non-Peak Capacity</b>	<b>12.9</b>	<b>Potential Baseload Capacity</b>	<b>-</b>
<b>Not including: Under Construction, In Service</b>		<b>Not including: Under Construction, In Service</b>		<b>Not including: Under Construction, In Service</b>	
<i>As Available Peaking Generation Technologies:</i>		<i>As Available Non-Peaking Generation Technologies:</i>		<i>Baseload Generation Technologies:</i>	
<i>Photovoltaic, Solar</i>		<i>Wind, Run of River Hydro</i>		<i>Geothermal, Biomass, Biogas, Landfill gas</i>	
Technology	Photovoltaic	Technology	Wind	Technology	Geothermal
Sum of Facility Export (if<5MW)		Sum of Facility Export (if<5MW)		Sum of Facility Export (if<5MW)	
Current Phase	Total	Current Phase	Total	Current Phase	Total
In-Service	204.8	System Impact Study In Progress	5.05	Application Review Complete	0
Construction	86.677	Supplemental Review In Progress	3	IA Negotiation	0
In-Service (Conditional PTO)	51.732	In-Service	3.705	<b>Grand Total</b>	<b>0</b>
IA Negotiation	18.287	Application Review In Progress	3		
Phase II In Progress	15	Construction	1.5		
IA Amendment	10.3	Material Modification	0	Technology	(Multiple Items)
Application Review In Progress	8.74	<b>Grand Total</b>	<b>16.255</b>		Biogas/landfill gas
Transferred to WDAT	8.16			Sum of Facility Export (if<5MW)	
Fast Track Initial Review Complete	6.84			Current Phase	Total
Interconnection Agreement	5.976	Technology	(Multiple Items)	In-Service	4.3
Application Review Complete	5.22		Hydro	Construction	0
System Impact Study In Progress	5	Sum of Facility Export (if<5MW)		In-Service (Conditional PTO)	0
Material Modification	5	Current Phase	Total	<b>Grand Total</b>	<b>4.3</b>
Fast Track Initial Review In Progress	4.48	In-Service	4.482		
Phase I Complete	3	IA Negotiation	1.82	Technology	Geothermal
Transferred to Rule 21	2.5	In-Service (Conditional PTO)	1.4		
System Impact Study Complete	1.92	<b>Grand Total</b>	<b>7.702</b>	Sum of Facility Export (if<5MW)	
Supplemental Review In Progress	0.959			Current Phase	Total
IA - FERC Unexecuted	0.374			Application Review Complete	0
Technical Assessment In Progress	0			IA Negotiation	0
Facilities Assessment In Progress	0			<b>Grand Total</b>	<b>0</b>
Phase I In Progress	0				
Restudy In Progress	0				
<b>Grand Total</b>	<b>444.96</b>				
Technology	Solar				
Sum of Facility Export (if<5MW)					
Current Phase	Total				
In-Service	6.2				
Construction	0				
In-Service (Conditional PTO)	0				
<b>Grand Total</b>	<b>6.2</b>				

See Attachment G for source information



**SDGE Interconnection Queue as of October 23, 2015** <sup>[8]</sup>

where the Facility Size is less than or equal to 5MW of exporting capacity

<b>Potential As Available Peak Capacity (MW)</b>	<b>29.8</b>
<b>Not including: Under Construction, In Service</b>	

*As Available Peaking Generation Technologies:  
Photovoltaic, Solar*

Fuel Type	PV
-----------	----

IA Status	Sum of Facility Max Export (if<5)
SGIA Complete	8.00
FIT	6.50
In Progress	6.25
System Impact Study Complete	6.00
IA Complete	3.00
Project Completed	1.6
<b>Grand Total</b>	<b>31.35</b>

<b>Potential As Available Non-Peak Capacity (MW)</b>	<b>0.0</b>
<b>Not including: Under Construction, In Service</b>	

*As Available Non-Peaking Generation Technologies:  
Wind, Run of River Hydro*

<b>Potential As Available Baseload Capacity (MW)</b>	<b>0.0</b>
<b>Not including: Under Construction, In Service</b>	

*Baseload Generation Technologies:  
Geothermal, Biomass, Biogas*

Fuel Type	Land Fill Gas
-----------	---------------

IA Status	Sum of Facility Max Export (if<5)
Project Completed	3.20
<b>Grand Total</b>	<b>3.20</b>

## Sources

- [1] "Archived Program Capacity." *ReMAT Feed-in Tariff (Senate Bill 32) Website*. Pacific Gas & Electric, 1 Sept. 2015.
- [2] "10 Day Reporting Requirement." *ReMAT Feed-in Tariff (Senate Bill 32) Website*. Pacific Gas & Electric, 15 Sept. 2015.
- [3] "Program Period (12 &13)." *ReMAT Feed-in Tariff (Senate Bill 32) Website*. Pacific Gas & Electric, Nov. 2015.
- [4] "Program Period (12 &13)." *Renewable Market Adjusting Tariff for Small Renewable Generation Website*. San Diego Gas & Electric, Nov. 2015.
- [5] "ReMAT 10 Day Reporting Table." *ReMAT Program Documents; Supporting Documents*. Southern California Edison Website, 10 Aug. 2015.
- [6] "Re-MAT Capacity Calculations Program Period (12 & 13)." *ReMAT Program Documents; Supporting Documents*. Southern California Edison, 14 Oct. 2015. Web.
- [7] "ReMAT PPA Summary Report." *Renewable Market Adjusting Tariff for Small Renewable Generation Website*. San Diego Gas & Electric, June 2014.
- [8] "SDG&E WDAT & Rule 21 Interconnection Queue." *Wholesale Generator Transmission Information Website*. San Diego Gas & Electric, 23 Oct. 2015.
- [9] "Public Queue." *Wholesale Electric Generation Interconnection; Interconnection to the PG&E Grid Website*. Pacific Gas & Electric,
- [10] "Public WDAT-Rule 21 Queue; Interconnection Queue. SCE-WDAT and Rule 21 Interconnection Requests." *Open Access Information Website*. Southern California Edison, 24 Sept. 2015.
- [11] "Electric Schedule E-REMAT; Renewable Market Adjusting Tariff (REMAT)." *Advise 4246-E. Decision Number 13-05-034*. Pacific Gas & Electric. 24 June, 2013.
- [12] "Schedule Re-MAT; Renewable Market Adjusting Tariff." *Cal. PUC Sheet Number 52964-E. Advise 2916-E. Decision Number 13-05-034*. Southern California Edison. 24 June, 2013.
- [13] "Schedule Re-MAT; Renewable Market Adjusting Tariff." *Cal. PUC Sheet Number 23593-E. Advise 2492-E. Decision Number 13-05-034*. San Diego Gas & Electric Company. 24 June, 2013.
- [14] "Queue Information Effective After Program Period 9." *ReMAT Program Documents; Supporting Documents*. Southern California Edison, May. 2015. Web.
- [15] SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) 2011-2013 COMPLIANCE PERIOD 1 VERIFIED AND 2015 PRELIMINARY ANNUAL 33% RENEWABLES PORTFOLIO STANDARD COMPLIANCE REPORT). Southern California Edison, Public Utilities Commission of the State of California, Sept. 2016. Web
- [16] 2015 ANNUAL 33% RPS COMPLIANCE REPORT AND FINALVERIFIED 2011-2013 RPS COMPLIANCE REPORT OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) (PUBLIC VERSION). Pacific Gas and Electric, Public Utilities Commission f the State of California, Sept. 2016. Web.

Source [14]

**Queue Information Effective for Program Period 18 as of 09/01/2016**

Please note that the information provided is subject to change as new projects come into the queue, PPRs are marked complete, projects withdraw, etc. SCE believes the information offered to be accurate as of the date provided, however, no guaranty of accuracy or completeness is made.

**As-Available Peaking:** There are currently 10 different applicants with 14 projects and a total of 31.5 MW in the queue for this Product Type. All of the projects in this Product Type are solar.

1500 kW  
1500  
1500  
1500  
1500  
1500  
3000  
3000  
3000  
3000  
3000  
3000  
1500  
3000

**As-Available Non Peaking:** There are currently fewer than 5 applicants in this Product Type.

**Baseload:** There are currently fewer than 5 applicants in this Product Type.



## Notes on Potential Discrepancies

- Data in Attachments A/B assume a constant Total ReMAT capacity consistent for Periods 12 and 13 across all periods for SCE, PGE, and SDGE. PGE's Archived Program Capacity [1] reflects a fluctuating Total ReMAT Capacity such that the Remaining ReMAT Capacity may slightly differ between Attachments A/B and PGE's Archived Program Capacity.
- Data in this filing take into consideration all terminated contracts by removing the terminated MW from the ReMAT Contracts Allocated category and adding them back into the Remaining ReMAT Capacity. SCE and PGE Published Data [1][2][6] do not incorporate some of these terminated MWs. These discrepancies are noted as Revisions in Attachment G Source [15].