

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Agenda Item 30

Agenda ID # 12673

RESOLUTION E-4637

January 16, 2014

ENERGY DIVISION

REDACTED

R E S O L U T I O N

Resolution E-4637. San Diego Gas & Electric Company requests approval of amendments to power purchase agreements (PPAs) with Tierra del Sol Solar Farm, LLC, LanWest Solar Farm, LLC, LanEast Solar Farm, LLC, and Rugged Solar, LLC.

PROPOSED OUTCOME: This Resolution approves cost recovery for the long-term renewable energy power purchase agreements, as amended, between San Diego Gas & Electric Company and Tierra del Sol Solar Farm, LLC, LanWest Solar Farm, LLC, LanEast Solar Farm, LLC, and Rugged Solar, LLC. The amendments result in several modifications, including: later commercial online date, new site location, new interconnection point, and other conforming changes to make the amendments consistent. They are approved without modifications.

SAFETY CONSIDERATIONS:

Based on the information before us, Tierra del Sol Solar Farm, LLC, LanWest Solar Farm, LLC, LanEast Solar Farm, LLC, and Rugged Solar, LLC power purchase agreements, as amended, do not appear to result in any adverse safety impacts on the facilities or operations of SDG&E.

ESTIMATED COST: Costs of the power purchase agreements, as amended, are confidential at this time.

By Advice Letter 2552-E filed on November 27, 2013.

SUMMARY

San Diego Gas & Electric Company's power purchase agreements, as amended, with Tierra del Sol Solar Farm, LLC, LanWest Solar Farm, LLC, LanEast Solar Farm, LLC, and Rugged Solar, LLC comply with the Renewables Portfolio Standard (RPS) procurement guidelines and are approved without modification

San Diego Gas & Electric Company (SDG&E) filed Advice Letter (AL) 2552-E on November 27, 2013, requesting California Public Utilities Commission (Commission) review and approval of amendments to renewable energy power purchase agreements (PPAs) between SDG&E and Tierra del Sol Solar Farm, LLC, LanWest Solar Farm, LLC, LanEast Solar Farm, LLC, and Rugged Solar, LLC. The original PPAs were 25-year contracts for generation from four new concentrating solar photovoltaic facilities that are being developed by Soitec, Inc. near Calexico, Imperial County, California.¹

Changes to the original PPAs pursuant to the proposed amendments include:

1. Modification of the Commercial Online Dates;
2. Modification of the site locations;
3. Modification of the interconnection and delivery points;
4. Increased project capacity factors;
5. Addition of excess delivery terms; and
6. Addition and modification of definitions, milestone dates, and operational/technical sections of the PPAs to make them consistent with the amendments.

The amendments do not affect contract term length or the PPAs' prices and the unamended terms of the original PPAs remain in full force and effect. In AL 2552-E, SDG&E asserts that the amendments will increase the viability of the projects because the new project sites already have all of the required major permits and an executed interconnection agreement.

¹ The original contracts were approved in Resolution E-4439 on November 10, 2011.

SDG&E’s execution of these amendments are consistent with SDG&E’s 2012 RPS Procurement Plan, approved in Decision 12-11-016. This resolution approves the amendments to the Tierra del Sol Solar Farm, LLC, LanWest Solar Farm, LLC, LanEast Solar Farm, LLC, and Rugged Solar, LLC PPAs without modification. Payments for deliveries from the Tierra del Sol Solar Farm, LLC, LanWest Solar Farm, LLC, LanEast Solar Farm, LLC, and Rugged Solar, LLC PPAs, as amended, are fully recoverable in rates over the life of the PPAs, subject to Commission review of SDG&E’s administration of the amended PPAs.

The following table provides a summary of the Tierra del Sol Solar Farm, LLC, LanWest Solar Farm, LLC, LanEast Solar Farm, LLC, and Rugged Solar, LLC PPAs:

Table 1: Summary of Proposed PPAs

Generating Facility	Technology Type	Term (Years)	Capacity (MW)	Energy (GWh/year)	Online Date	Location
LanEast	Concentrating PV	25	12 - 22	59.3	12/31/2015	Calexico, CA
LanWest	Concentrating PV	25	3.5 - 6.5	16.5	12/31/2015	Calexico, CA
Rugged	Concentrating PV	25	60 - 80	207.6	12/31/2015	Calexico, CA
Tierra del Sol	Concentrating PV	25	35 - 45	123.9	12/31/2015	Calexico, CA
			114 - 160	407.3		

BACKGROUND

Overview of the Renewables Portfolio Standard (RPS) Program

The California RPS program was established by Senate Bill (SB) 1078, and has been subsequently modified by SB 107, SB 1036, and SB 2 (1X).² The RPS program is codified in Public Utilities Code Sections 399.11-399.31.³ Under SB 2 (1X), the RPS program requires each retail seller to procure eligible

² SB 1078 (Sher, Chapter 516, Statutes of 2002); SB 107 (Simitian, Chapter 464, Statutes of 2006); SB 1036 (Perata, Chapter 685, Statutes of 2007); SB 2 (1X) (Simitian, Chapter 1, Statutes of 2011, First Extraordinary Session).

³ All further references to sections refer to Public Utilities Code unless otherwise specified.

renewable energy resources so that the amount of electricity generated from eligible renewable resources be an amount that equals an average of 20 percent of the total electricity sold to retail customers in California for compliance period 2011-2013; 25 percent of retail sales by December 31, 2016; and 33 percent of retail sales by December 31, 2020.⁴

Additional background information about the Commission's RPS Program, including links to relevant laws and Commission decisions, is available at <http://www.cpuc.ca.gov/PUC/energy/Renewables/overview.htm> and <http://www.cpuc.ca.gov/PUC/energy/Renewables/decisions.htm>.

NOTICE

Notice of Advice Letter 2552-E was made by publication in the Commission's Daily Calendar. SDG&E states that copies of the Advice Letter was mailed and distributed in accordance with Section IV of General Order 96-B.

PROTESTS

SDG&E Advice Letter 2552-E was not protested.

DISCUSSION

San Diego Gas & Electric Company requests approval of renewable energy power purchase agreements, as amended, with Tierra del Sol Solar Farm, LLC, LanWest Solar Farm, LLC, LanEast Solar Farm, LLC, and Rugged Solar, LLC.

The Tierra del Sol Solar Farm (Tierra del Sol), LanWest Solar Farm (LanWest), LanEast Solar Farm (LanEast), and Rugged Solar (Rugged) projects are new concentrating solar photovoltaic (CPV) facilities to be located near Calexico in Imperial County, California. On November 10, 2011, the Commission approved Resolution E-4439, which approved the original PPAs between SDG&E and Tierra del Sol, LanWest, LanEwast, and Rugged for RPS-eligible energy and

⁴ D.11-12-020 established a methodology to calculate procurement requirement quantities for the three different compliance periods covered in SB 2 (1X) (2011-2013, 2014-2016, and 2017-2020).

associated RECs generated from the facilities.⁵ On November 27, 2013, SDG&E filed AL 2552-E requesting Commission approval of amendments to the original PPAs with Tierra del Sol, LanWest, LanEast, and Rugged. SDG&E asserts in AL 2552-E that the purpose of the proposed amendments is to enhance project viability by moving projects to a permitted site with an approved interconnection agreement.⁶

The amendments modify the original PPAs in several aspects:

1. Modifies the Commercial Online Dates (“COD”) to December 31, 2015;
2. Modifies project site locations;
3. Modifies interconnection and delivery points to the Imperial Valley substation;
4. Modifies capacity factors;
5. Adds excess delivery terms; and
6. Adds or modifies definitions, milestone dates, and operational/technical sections of the PPAs to make them consistent with the amendments.

The amendment does not affect contract term length or contract price.

SDG&E requests that the Commission issue a resolution that:

1. The PPAs, as amended, are reasonable and consistent with SDG&E’s Commission-approved RPS Plan and; procurement from the PPAs, as amended, will contribute towards SDG&E’s RPS procurement obligation.
2. SDG&E’s entry into the amendments and the terms of such proposed amendments are reasonable; therefore, the proposed amendments are approved in its entirety and all costs of the purchase associated with the PPAs, as amended by the proposed amendments, including costs for energy, green attributes, and resource adequacy, are fully recoverable in rates over the life of the PPAs, as amended, by the proposed amendments,

⁵ Prior to Commission approval of Tierra del Sol, LanWest, LanEast, and Rugged PPAs in Resolution E-4439 the PPAs were amended. This Resolution refers to the PPAs, as amended by the first amendments, as “original PPAs.”

⁶ SDG&E AL 2552-E, p. 2.

subject to Commission review of SDG&E's administration of the PPAs, as amended, by the proposed amendments.

3. Generation procured pursuant to the PPAs, as amended by the proposed amendments, constitutes generation from eligible renewable energy resources for purposes of determining SDG&E's compliance with any obligation that it may have to procure eligible renewable energy resources pursuant to the California Renewable Portfolio Standard program (Public Utilities Code §§ 399.11, *et seq.* and/or other applicable law) and relevant Commission decisions.
4. The PPA, as amended by the proposed amendments, will contribute to SDG&E's minimum quantity requirement established in D.12-06-038.

Energy Division evaluated the Tierra del Sol, LanWest, LanEast, and Rugged PPAs, as amended, using the following criteria:

- Consistency with SDG&E's 2012 RPS Procurement Plan and RPS Portfolio Need;
- Consistency with SDG&E's Least-Cost, Best-Fit requirements;
- Cost Reasonableness and Net Market Value;
- Independent Evaluator review;
- Procurement Review Group participation; and
- Project Viability Assessment and Development Status.

Consistency with SDG&E's 2012 RPS Procurement Plan

Pursuant to statute, SDG&E's RPS Procurement Plan (Plan) includes an assessment of supply and demand to determine the optimal mix of renewable generation resources; description of potential RPS compliance delays; status update of projects within its RPS portfolio; an assessment of the project failure and delay risk within its RPS portfolio; and bid solicitation protocol setting forth the need for renewable generation of various operational characteristics.⁷

California's RPS statute also requires that the Commission review the results of a renewable energy resource solicitation submitted for approval by a utility.⁸ The

⁷ Pub. Util. Code § 399.13(a)(5).

⁸ Pub. Util. Code § 399.13(d).

Commission reviews the results to verify that the utility conducted its solicitation according to its Commission-approved procurement plan.⁹

In SDG&E's 2012 RPS Plan, SDG&E expressed a commitment to meet its RPS requirements in a cost-effective manner.¹⁰ SDG&E's 2012 RPS Plan also called for SDG&E to issue competitive solicitations for the purchase and sale of RPS-eligible energy and/or RECs and that bilateral offers would be considered if they were competitive when compared against recent solicitation offers and provide benefits to SDG&E customers. Specifically, SDG&E expressed a preference for CODs beginning in 2017. In addition, SDG&E stated that it would consider short-term contracts when it is short in the most immediate Compliance Period, but long in the subsequent Compliance Period. SDG&E also noted that it would consider procurement strategies that maximize the product category limitations in order to optimize ratepayer value across compliance periods. Lastly, SDG&E's Plan discussed utility plans to pursue renewable energy generation development partnerships and utility-owned resources.

SDG&E's 2012 RPS Plan, as noted above, included an assessment of SDG&E's supply and demand of renewable generation resources. Energy Division also completed an analysis of SDG&E's RPS need and forecasts SDG&E to have excess renewable generation in all three Compliance Periods.¹¹ This Energy Division forecast risk-adjusts SDG&E's RPS net long/short position to take into account a certain amount of contract failure within SDG&E's RPS procurement portfolio.^{12,13}

⁹ SDG&E's 2012 RPS Procurement Plan was approved by D.12-11-016 on November 8, 2012.

¹⁰ While the proposed amendments were filed with the Commission after SDG&E's 2013 RPS Procurement Plan was approved, SDG&E had not yet filed its final 2013 RPS Procurement and the negotiation of the amendments began prior to Commission approval. Thus, Energy Division compared the consistency of the PPAs, as amended, with SDG&E's 2012 RPS Plan.

¹¹ In addition to increasing California's RPS requirement to 33 percent from 20 percent, SB 2 (1X) (Simitian, Chapter 1, Statutes of 2011, First Extraordinary Session) establishes three different compliance periods. In D.11-12-020 the Commission defined the compliance periods (2011-2013; 2014-2016; and 2017-2020) and the methodology for calculating the RPS procurement quantity requirements for each compliance period.

¹² Energy Division staff's forecast of SDG&E's RPS Procurement Portfolio is based on SDG&E's 2012 Preliminary Annual 33% RPS Compliance Report and the Commission's RPS Project Status

Footnote continued on next page

All or a portion of the forecasted excess procurement from a compliance period could potentially be applied towards future RPS requirements, and thus could reduce SDG&E's future RPS procurement needs. As Commission-approved PPAs, the Tierra del Sol, LanWest, LanEast, and Rugged PPAs were assumed in Energy Division's RPS need analysis. Thus, the amendments would only slightly increase the amount of expected RECs in SDG&E's portfolio.

The amendments change the projects' CODs to December 31, 2015.¹⁴ That change reduces the amount SDG&E is over contracted in Compliance Period 2014-2016. Accordingly, the modification improves the fit of the Tierra del Sol, LanWest, LanEast, and Rugged PPAs with SDG&E's RPS need. Based on the characteristics of the amended Tierra del Sol, LanWest, LanEast, and Rugged agreements, they fit SDG&E's renewable resource needs as identified in its 2012 RPS Plan. Therefore, the amended Tierra del Sol, LanWest, LanEast, and Rugged PPAs are consistent with SDG&E's 2012 RPS Procurement Plan, as approved by D.12-11-016.

Consistency with SDG&E's least-cost best-fit (LCBF) methodology

In D.04-07-029, the Commission directs the utilities to use certain criteria in their LCBF selection of renewable resources.¹⁵ The decision offers guidance regarding the process by which the utility ranks bids in order to select or "shortlist" the bids with which it will commence negotiations. As described in its RPS Procurement Plan, SDG&E's LCBF bid evaluation includes a quantitative

Table. The Energy Division's forecast does not include any contracts pending Commission approval, contracts executed - but not filed, nor contracts under negotiation.

¹³ Energy Division staff made several assumptions in developing its forecast: 1) operational projects will generate 100% of contracted generation; 2) projects under development will have a 75 percent rate of meeting the terms and conditions of the PPAs; 3) no carrying over of forecasted excess generation from one compliance period to another because SDG&E may or may not choose to apply all excess procurement towards subsequent requirements (but, if all forecasted eligible excess procurement is applied to future compliance periods, SDG&E is forecasted to have a net long position, instead of a net short position, for Compliance Period 2017-2020); and 4) prior deficits will need to be satisfied.

¹⁴ The Tierra del Sol, LanWest, LanEast, and Rugged PPAs' CODs were originally, December 31, 2014, February 28, 2014, October 31, 2014, and December 31, 2014, respectively.

¹⁵ See § 399.14(a)(2)(B).

analysis and qualitative criteria. SDG&E's quantitative analysis or market valuation includes evaluation of price, time of delivery factors, transmission costs, congestion costs, and resource adequacy. SDG&E's qualitative analysis focuses on comparing similar bids across numerous factors, such as location, benefits to minority and low income areas, resource diversity.

SDG&E negotiated the proposed amendments bilaterally; therefore, the amended Tierra del Sol, LanWest, LanEast, and Rugged PPAs did not compete directly with other RPS projects. In AL 2552-E, SDG&E explains that it evaluated the amended Tierra del Sol, LanWest, LanEast, and Rugged PPA using the same LCBF evaluation methodology it employs for evaluating bids from its annual RPS solicitations. Thus, SDG&E used its LCBF methodology to evaluate the amended Tierra del Sol, LanWest, LanEast, and Rugged PPAs. See the "Cost Reasonableness and Net Market Value" section of this resolution for a discussion of the cost and value of the amended PPAs. In addition, see Confidential Appendix A for SDG&E's LCBF evaluation of the project.

The amended Tierra del Sol, LanWest, LanEast, and Rugged PPAs were evaluated consistent with the LCBF methodology identified in SDG&E's RPS Procurement Plan

Cost Reasonableness and Net Market Value

The Commission's reasonableness review for RPS PPAs includes a comparison of the proposed PPA's price and net market value (the result of the LCBF calculation) relative to other RPS offers received in recent RPS solicitations and to contracts executed in the 12 months prior to the proposed PPA's execution date. Using this methodology, the Commission found the original Tierra del Sol, LanWest, LanEast, and Rugged PPAs' costs were reasonable. Based on the analysis provided by SDG&E in AL 2552-E, the Commission determines that the total net market value of the amended Tierra del Sol, LanWest, LanEast, and Rugged PPA has improved slightly over the original PPAs and that the expected costs of the amended Tierra del Sol, LanWest, LanEast, and Rugged PPAs are not significantly changed. (See Confidential Appendix A for a discussion of the contractual pricing terms.)

The Tierra del Sol, LanWest, LanEast, and Rugged PPAs, as amended, have slightly improved net market value in comparison to the original PPAs.

Payments made by SDG&E under the Tierra del Sol, LanWest, LanEast, and Rugged PPAs, as amended, are fully recoverable in rates over the life of the amended PPAs, subject to Commission review of SDG&E's administration of the amended PPAs.

Independent Evaluator Review

SDG&E retained independent evaluator (IE) Jonathan Jacobs of PA Consulting Group to oversee SDG&E's amendment negotiations with Tierra del Sol, LanWest, LanEast, and Rugged and to evaluate the overall merits for Commission approval of the amendment. AL 2552-E included a public and confidential independent evaluator's report. Because the IE reviewed the original PPA, he revised his original report to reflect the proposed amendments. In the revised IE report, the IE states that the proposed amendments should increase the viability of projects and the costs of the projects have not significantly changed.

Consistent with D.06-05-039 and D.09-06-050, an independent evaluator oversaw SDG&E's negotiations with Tierra del Sol, LanWest, LanEast, and Rugged.

Procurement Review Group Participation

The Procurement Review Group (PRG) was initially established in D.02-08-071 as an advisory group to review and assess the details of the IOUs' overall procurement strategy, solicitations, specific proposed procurement contracts and other procurement processes prior to submitting filings to the Commission.¹⁶ SDG&E asserts that the proposed amendments to the Tierra del Sol, LanWest, LanEast, and Rugged PPA was discussed at PRG meetings in September, October, and November of 2013.

Pursuant to D.02-08-071, SDG&E's Procurement Review Group participated in the review of the proposed amendments to the Tierra del Sol, LanWest, LanEast, and Rugged PPAs.

¹⁶ SDG&E's PRG includes representatives of the Union of Concerned Scientists, the Coalition of California Utility Employees, The Utility Reform Network, the Commission's Energy Division and the Office of Ratepayer Advocates, and the California Department of Water Resources.

Project Viability Assessment and Development Status

SDG&E asserts that the Tierra del Sol, LanWest, LanEast, and Rugged projects continue to be viable and that the proposed amendments will increase their viability. SDG&E bases its assertion on its evaluation of the project's viability using the Commission-approved project viability calculator, which uses standardized criteria to quantify a project's strengths and weaknesses in key areas of renewable project development. Additionally, SDG&E provided the following information about the projects' development status.

Site control and permitting status

The proposed facilities are to be re-located to private land that SDG&E asserts is under full site control by the site owner. SDG&E provides in AL 2552-E that the site owner has obtained a land use permit from Imperial County and a Certificate for Public Convenience and Necessity for the required transmission and substation. All necessary remaining permits are expected to be obtained.

Interconnection and transmission

Tierra del Sol, LanWest, LanEast, and Rugged will interconnect at the Imperial Valley Substation. In AL 2552-E, SDG&E describes its expectation that the projects will be able to use an existing interconnection agreement which can fully accommodate the full capacity of the four projects.

RPS Eligibility and CPUC Approval

Pursuant to Pub. Util. Code § 399.13, the CEC certifies eligible renewable energy resources. Generation from a resource that is not CEC-certified cannot be used to meet RPS requirements. To ensure that only CEC-certified energy is procured under a Commission-approved RPS contract, the Commission has required standard and non-modifiable "eligibility" language in all RPS contracts. That language requires a seller to warrant that the project qualifies and is certified by the CEC as an "Eligible Renewable Energy Resource," that the project's output delivered to the buyer qualifies under the requirements of the California RPS, and that the seller uses commercially reasonable efforts to maintain eligibility should there be a change in law affecting eligibility.¹⁷

¹⁷ See, e.g. D.08-04-009 at Appendix A, STC 6, Eligibility.

The Commission requires a standard and non-modifiable clause in all RPS contracts that requires “CPUC Approval” of a PPA to include an explicit finding that:

“any procurement pursuant to this Agreement is procurement from an eligible renewable energy resource for purposes of determining Buyer's compliance with any obligation that it may have to procure eligible renewable energy resources pursuant to the California Renewables Portfolio Standard (*Public Utilities Code Section 399.11 et seq.*), Decision 03-06-071, or other applicable law.¹⁸

Notwithstanding this language, the Commission has no jurisdiction to determine whether a project is an eligible renewable energy resource, nor can the Commission determine prior to final CEC certification of a project that “any procurement” pursuant to a specific contract will be “procurement from an eligible renewable energy resource.”

Therefore, while we include the required finding here, this finding has never been intended, and shall not be read now, to allow the generation from a non-RPS-eligible resource to count towards an RPS compliance obligation. Nor shall such a finding absolve the seller of its obligation to obtain CEC certification, or the utility of its obligation to pursue remedies for breach of contract. Such contract enforcement activities shall be reviewed pursuant to the Commission’s authority to review the utilities’ administration of contracts.

Confidential Information

The Commission, in implementing Pub. Util. Code § 454.5(g), has determined in D.06-06-066, as modified by D.07-05-032, that certain material submitted to the Commission as confidential should be kept confidential to ensure that market sensitive data does not influence the behavior of bidders in future RPS solicitations. D.06-06-066 adopted a time limit on the confidentiality of specific terms in RPS contracts. Such information, such as price, is confidential for three years from the date the contract states that energy deliveries begin, except contracts between IOUs and their affiliates, which are public.

¹⁸ See, e.g. D.08-04-009 at Appendix A, STC 1, CPUC Approval.

The confidential appendices, marked "[REDACTED]" in the public copy of this resolution, as well as the confidential portions of the advice letter, should remain confidential at this time.

COMMENTS

This is an uncontested matter in which the resolution grants the relief requested. Accordingly, pursuant to Pub. Util. Code § 311(g)(2), the otherwise applicable 30-day period for public review and comment is being waived.

FINDINGS AND CONCLUSIONS

1. The Tierra del Sol Solar Farm, LLC, LanWest Solar Farm, LLC, LanEast Solar Farm, LLC, and Rugged Solar, LLC (Tierra del Sol, LanWest, LanEast, and Rugged) PPAs, as amended, are consistent with SDG&E's 2012 RPS Procurement Plan, as approved by D.12-11-016.
2. The Tierra del Sol, LanWest, LanEast, and Rugged PPAs, as amended, were evaluated consistent with the least-cost best-fit methodology identified in SDG&E's 2012 RPS Procurement Plan.
3. The Tierra del Sol, LanWest, LanEast, and Rugged PPAs, as amended, have slightly improved net market value in comparison to the original Tierra del Sol, LanWest, LanEast, and Rugged PPAs.
4. Payments made by SDG&E under the Tierra del Sol, LanWest, LanEast, and Rugged PPAs, as amended, are fully recoverable in rates over the life of the PPAs and amendments, subject to Commission review of SDG&E's administration of the PPAs and amendments.
5. Pursuant to D.02-08-071, SDG&E's Procurement Review Group participated in the review of the amendments to the Tierra del Sol, LanWest, LanEast, and Rugged PPAs.
6. SDG&E asserts that the Tierra del Sol, LanWest, LanEast, and Rugged projects are viable and will provide renewable energy according to the terms and conditions in the Tierra del Sol, LanWest, LanEast, and Rugged PPAs, as amended.

7. Procurement pursuant to the amended Tierra del Sol, LanWest, LanEast, and Rugged PPAs is procurement from eligible renewable energy resources for purposes of determining SDG&E's compliance with any obligation that it may have to procure eligible renewable energy resources pursuant to the California Renewables Portfolio Standard (Public Utilities Code Section 399.11 et seq.), D.03-06-071 and D.06-10-050, or other applicable law.
8. The immediately preceding finding shall not be read to allow generation from a non-RPS eligible renewable energy resource under these amended PPAs to count towards an RPS compliance obligation. Nor shall that finding absolve SDG&E of its obligation to enforce compliance with these amended PPAs.
9. The confidential appendices, marked "[REDACTED]" in the public copy of this Resolution, as well as the confidential portions of the advice letter, should remain confidential at this time.
10. AL 2552-E should be approved effective today without modification.

THEREFORE IT IS ORDERED THAT:

1. San Diego Gas & Electric Company's Advice Letter 2552-E, requesting Commission review and approval of amendments to renewable power purchase agreements with Tierra del Sol Solar Farm, LLC, LanWest Solar Farm, LLC, LanEast Solar Farm, LLC, and Rugged Solar, LLC, is approved without modification.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on January 16, 2014; the following Commissioners voting favorably thereon:

PAUL CLANON
Executive Director

Confidential Appendix A

Evaluation Summary of the Amended Tierra del Sol,
LanWest, LanEast, and Rugged PPAs

[Redacted]