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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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

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

**ASSIGNED COMMISSIONER'S RULING
REGARDING POTENTIAL RENEWABLES PORTFOLIO STANDARD
DEVELOPMENT IN IMPERIAL VALLEY AND EVALUATION
OF RENEWABLE PROCUREMENT CONTRACTS**

On December 18, 2008, the Commission granted a Certificate of Public Convenience and Necessity for the construction of the Sunrise Powerlink Transmission Project (Sunrise). (Decision (D.) 08-12-058.) The Commission authorized this project noting that approval of Sunrise will help unlock the potential of one of the richest renewable energy regions in California, but that approval is only the first step toward fully developing renewable energy in the Imperial Valley. The Commission stated its intent to use all regulatory tools at its disposal so that the renewable resources enabled by Sunrise are developed. (*Id.*, p. 258.) It also noted that the principal means through which the Commission can ensure that Imperial Valley renewable resources are developed is by means of the utilities' annual renewables portfolio standard (RPS) procurement plans. (*Id.*, p. 261.)

The Commission identified three proposals related to development of renewable resources in the Imperial Valley. It also identified four issues that more generally apply to renewable resource procurement throughout the state,

but which could encourage the development of renewable projects facilitated by Sunrise. The Commission directed the assigned Commissioner in this proceeding to issue a ruling putting forth those proposals and issues for comment. (*Id.*, pp. 261-263; Ordering Paragraph 14.) This ruling carries out that direction.

The Commission expects the assigned Commissioner to expeditiously bring a proposed decision to the Commission addressing these items. (*Id.*, p.263.) The 2009 RPS procurement plans are now under review. It is important to hear from parties on these proposals and issues now so that the best ideas can be included in the 2009 Plans, without waiting for a later opportunity (e.g., RPS procurement plans in 2010 or later).

It is also worth noting that the four issues in the Sunrise order are directly linked to one of the key issues identified as part of the initial scope of this proceeding. Specifically, the order identified review of the least cost-best fit (LCBF) methodology, including the relationship of LCBF to project viability and seller non-performance, along with further consideration regarding uniform application of LCBF criteria. (See September 26, 2008 Scoping Memo and Ruling of Assigned Commissioner, Issue 3.3, pp. 4-5.) The directions to the assigned Commissioner in the Sunrise order provide a unique opportunity to efficiently enhance the record to further consider Issue 3.3 in the context of the 2009 Plans.

To help expedite consideration of these items, proposals and issues are stated in Attachment A, including background information on the range of issues. Further, Energy Division has expeditiously developed a proposal seeking to harmonize and advance treatment of the issues. This proposal is in Attachment B.

It is important to hear from respondents and parties on these matters, develop the record as it relates to the 2009 Plans, and provide the Commission with recommendations to integrate any modifications for the 2009 RPS solicitations. This ruling puts forth the proposals and issues, and sets a schedule for comments and reply comments. It also addresses the schedule for motions for hearing and responses to motions. (See September 26, 2008 Scoping Memo and Ruling of Assigned Commissioner, pp. 7-8.) Respondents and parties are reminded that pleadings must be verified; the same outline must be used for similar pleadings, to the fullest extent feasible; and motions for hearing must include certain specific items. (*Id.*, p. 7, Ordering Paragraphs 3, 5 and 6.)

IT IS RULED that:

1. Respondent utilities shall file and serve comments on proposals and issues stated in Attachment A and the accompanying Staff Proposal in Attachment B. Respondent utilities for the purpose of this ruling are Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company. Other respondents and parties may file and serve comments on proposals and issues, including the accompanying Staff Proposal. Respondent utilities, other respondents, and parties may file and serve reply comments.

2. Comments shall be filed and served within 21 days of the date of this ruling. Reply comments shall be filed and served within seven days of the date comments are filed. Motions for hearing shall be filed and served within seven days of the date reply comments are filed, and responses to motions within five days of the date motions are filed.

Dated February 3, 2009, at San Francisco, California.

/s/ MICHAEL R. PEEVEY

Michael R. Peevey
Assigned Commissioner

ATTACHMENT A
PROPOSALS AND ISSUES

Three proposals and four issues are identified by the Commission regarding development of the renewable resource potential in the Imperial Valley. (See D.08-12-058, pp. 258-263, and Ordering Paragraph 14 at p. 291.) Respondent utilities shall, and other respondents and parties may, file comments and reply comments, and may address any other related proposal or issue as discussed below. Respondent utilities for this purpose are Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E). Comments and reply comments may include assertions of facts and law and, to be most useful, must include clearly articulated support for each assertion and/or recommendation.

PROPOSALS

Proposal 1: Special Imperial County Bidder's Conference

In approving the Sunrise Powerlink Transmission Project (Sunrise), the Commission stated that the principal means by which it can ensure that Imperial Valley renewable resources are developed is through the annual renewables portfolio standard (RPS) procurement plan (Plan) filed by each utility. (D.08-12-058, p.261 citing § 399.14(a).) The Commission noted that it expects the approval of Sunrise to prompt proposals from RPS-eligible renewable developers for viable, competitively priced projects in the Imperial Valley in response to each utility's upcoming 2009 RPS solicitation. To increase the likelihood of this outcome and to highlight the opportunities for the Imperial Valley created by Sunrise, the Commission suggested that each respondent utility hold a special bidders conference in Imperial County.

Therefore, it is proposed that PG&E, SCE, and SDG&E each hold a special bidder's conference in Imperial County before the receipt of bids as part of its 2009 RPS solicitation. In its comments, each respondent utility (PG&E, SCE, SDG&E) shall provide specific information, as appropriate, on how it proposes to include the conference in its proposed schedule for the 2009 RPS procurement, and any other specific information and details necessary for the Commission to reach an informed decision on this proposal.

Proposal 2: Specific Monitoring of Imperial Valley Proposals

The Commission also discussed the possibility of a specific role for the Commission's Energy Division in determining whether attractive Imperial Valley projects do in fact make it through each utility's RPS procurement process. Respondent utilities would need to provide certain information, and updated information, for Energy Division to perform this role. This might also be true for other RPS-obligated load serving entities (LSEs).

Therefore, it is proposed that Energy Division specifically monitor Imperial Valley RPS project proposals. To help accomplish this, each respondent utility shall separately (a) identify the proposals from the Imperial Valley submitted in response to its 2009 RPS solicitation and (b) identify those that are shortlisted. Each respondent utility shall provide this information (and updates to this information) as requested by Energy Division. Other RPS-obligated LSEs shall also provide information (and updates) on specific RPS projects in the Imperial Valley to the extent requested by Energy Division.

Comments on this proposal should include specific information and recommendations, as appropriate, regarding identification of project proposals from Imperial Valley by each respondent utility (and, if relevant, other RPS-obligated LSEs), and how and when the information might be updated.

Comments should also include any other information necessary for the Commission to reach an informed decision on the proposal.

Proposal 3: Remedial Measures for 2010 Solicitation

The Commission stated that if Imperial Valley renewable projects resulting from the 2009 RPS solicitation are not approved by the Commission prior to the Commission's approval of the 2010 RPS Plans, then the Commission will consider remedial measures. In particular, it is proposed that some or all of the following remedial measures be adopted:

- Require utilities to automatically shortlist all Imperial Valley proposals that are received in the solicitation so that the projects receive special consideration;
- Include an Imperial Valley bid evaluation metric in the least cost-best fit methodology to give preference to Imperial Valley resources; and
- Require each utility to conduct a special Imperial Valley RPS solicitation.

Comments should include the party's position on whether or not any, some, or all of these measures should be adopted, and why or why not. Comments should also include a statement and description of other measures, if any, that should be adopted, and why. Past experience suggests that the Commission may or may not approve the 2010 RPS Plans prior to having approved contracts from the 2009 RPS solicitation. Therefore, comments should include specifics, as appropriate, of how and when to implement and administer each measure. Comments shall also include all other information reasonably necessary for the Commission to make an informed decision.

ISSUES

The Commission also said this ruling should address issues that more generally apply to renewable resource procurement throughout the state. (D.08-12-058, p. 262.) The decision specifically identified four issues for comment. Background on these issues is provided here, with the goal of helping inform comments. In addition, Energy Division has developed a proposal to address these issues. The proposal is contained in Attachment B. Respondent utilities shall, and parties may, comment on the issues and Energy Division's Staff Proposal.

Issue 1: Changes to Rules Regarding Contract Failure

What changes, if any, should the Commission make to its existing rules that pertain to situations in which a renewable contract fails?

Background

Power generation contracts (both RPS and conventional generation) can fail for a variety of reasons. Failures can happen up to, or after, the commercial online date (COD). We primarily address the project development period, i.e., up to the COD, and into the three-year period of flexible compliance.

(See D.06-10-050.)

A power purchase agreement (PPA) for the procurement of energy from a new RPS-eligible facility is typically executed before the facility has commenced commercial operation. In order to successfully develop a project (i.e., achieve commercial operation), the developer must achieve several milestones (e.g., obtain financing, obtain permits, perform resource studies, secure site control, achieve access to transmission, perform final engineering, complete construction, perform initial start-up testing). In some cases, the project's

technology requires additional development before it is commercially viable. There is risk associated with each of these project development milestones, and as a result, there is risk that contracts for new generation may fail.

To account for this possibility, each utility assumes that there will be some level of contract failure in its procurement decisions. The Commission does not set a specific level, but requires that each procurement plan include a reasonable margin of safety. (D.08-02-008, pp. 26-29.) Further, the Commission requires that investor-owned utilities (IOUs) submit Project Development Status Reports semi-annually to keep the Commission informed on the progress of each project meeting its development and commercial operation milestones. (D.06-05-039.)

RPS compliance rules allow an LSE to carry forward certain procurement deficits without penalty if it can demonstrate “seller non-performance.” (D.03-06-071.)¹ If an IOU uses seller non-performance as an excuse, however, that IOU must also show that it took all reasonable actions to meet its RPS obligations.

Staff Proposal and Comments

The Staff Proposal addresses methods for determining project viability and the relationship between project viability and RPS flexible compliance rules. (See Staff Proposal in Attachment B, Section 3). Parties should comment on the question posed above, and on the treatment suggested in the Staff Proposal.

¹ The claim of seller non-performance applies to conditions due to factors beyond the control of the IOU. If the IOU is responsible for the seller’s non-performance, this excuse is not permitted. (D.03-06-071, p. 50, footnote 43.)

Issue 2: Criteria Regarding Contract Viability and Failure

What criteria should the Commission use to assess the continuing viability of a contract once it has been approved, including criteria that can be used to determine whether a contract has failed?

Background

Prior to recommending approval of a PPA, Energy Division assesses project viability by reviewing several factors including (but not limited to) the following elements of project development: technology maturity, developer experience, project site control, equipment procurement, accessibility to financing, and availability of transmission.

After Commission approval of a PPA, Energy Division regularly receives updates on project development and estimates the likelihood of actual energy delivery per the contracted COD. This information, along with data from Project Development Status Reports, is used to identify project-specific and statewide barriers to successful project development. Energy Division does not treat a PPA as a failed contract until the utility informs Energy Division that the PPA has been cancelled.

Staff Proposal and Comments

The Staff Proposal recommends a process for assessing the viability of all Commission-approved RPS contracts. This assessment may then be used in a determination of contract failure. (See Staff Proposal, Sections 2(c), 2(b) and 3.) Parties should comment on the question posed above, and on the treatment suggested in the Staff Proposal.

Issue 3: Changes to Rules to Ensure Viable Projects are Selected

What changes in RPS rules need to be made to ensure that projects with demonstrated indicia of viability, including site control and sufficient financing, are given appropriately greater weight in the procurement selection process?

Background

RPS rules currently provide that IOUs may shortlist projects from solicitations after all bids are evaluated and ranked on a least cost-best fit (LCBF) basis. (D.04-07-029.) The LCBF evaluation assesses a project based on many factors including market valuation, portfolio fit, credit and collateral requirements, transmission cost adders and integration costs, and viability. Projects are then ranked against others in the selection process based on their individual evaluation.

The utilities are required to submit a written description of their LCBF evaluation methodology and bid selection process with their annual RPS Plan. Parties submit comments and reply comments on the utility's Plan, including the LCBF methodology, which inform the Commission's decision whether or not to accept the Plan as submitted; accept an amended version; or reject the Plan.

While evaluation methodologies may vary among the utilities and may also include criteria in addition to those listed above, the fundamental point is that the viability of each proposed project is considered. Specifically, all three utilities evaluate a project's viability based on predetermined criteria and each project receives a project viability score which is factored into the LCBF evaluation and resulting ranking of bids.

The RPS procurement selection process also involves the utility's procurement review group (PRG) and the public. The PRG is consulted by the IOU throughout the selection process. The IOU may report PRG comments in

various filings with the Commission, and the PRG or individual members may provide their own comments directly to the Commission. Further, the public may comment on an advice letter (AL) when the AL seeking Commission approval of an RPS contract is filed by an IOU.

Beginning with the 2006 RPS solicitation, the IOUs are also required to enlist an Independent Evaluator (IE) to oversee the RPS solicitation and resulting PPA negotiations. (D.06-05-039.) The IE's role is to ensure that the solicitation process is undertaken in a fair and consistent manner. An IE Report is required for each solicitation, which addresses the entire process (i.e., bid, solicitation, evaluation, selection). In addition, a PPA-specific IE Report is submitted with each AL seeking approval for a shortlisted project. The report discusses project specific information in detail (e.g., project viability, price, PPA contract terms and conditions). The oversight of an IE during each IOU's procurement process increases the likelihood that the LCBF resources are selected and acquired consistent with the solicitation guidelines and the utility's annual RPS Plan.

Staff Proposal and Comments

The Staff Proposal addresses this issue and recommends the utilities be required to employ standardized project viability criteria in their LCBF evaluation methodology. (See Staff Proposal, Section 1(a).) Additionally, the Staff Proposal seeks to increase transparency regarding an IOU's determination of project viability. (See Staff Proposal, Section 1(b).) Parties should comment on the question posed above, and on the treatment suggested in the Staff Proposal.

Issue 4: Changes to Rules Regarding Milestones, Credit, Collateral, and Deposits

What changes to RPS rules should be made to existing milestone requirements or credit, collateral, and deposit provisions to ensure that the most viable projects are awarded PPAs?

Background

Each utility's annual RPS Plan includes a *pro forma* contract. Terms and conditions regarding milestones, credit, collateral, and deposits are included in that contract. Within the Commission's guidelines for standard terms and conditions, each IOU may have somewhat different terms and conditions regarding these provisions, and the IOU may change the terms and conditions from one year to another.

In their draft 2009 RPS Plans, PG&E and SCE propose to increase the project development security required for their 2009 RPS solicitations. Increasing project development security may provide additional security to the utility that the project will adhere to PPA terms and conditions. Also, higher security may screen out projects that lack financial ability to achieve commercial operation, although it may also eliminate potentially viable projects that cannot provide the security and collateral requirements at the time required.

Staff Proposal and Comments

The Staff Proposal addresses this issue and recommends that a project's viability score be aligned with the three elements of the Proposal: (a) project development security, (b) the ongoing administration of Commission-approved contracts, and (c) the rules for assessing contract failure. (See Staff Proposal, Sections 1(c), 2(b) and 3.) Parties should comment on the question posed above, and on the treatment suggested in the Staff Proposal.

OTHER

In comments, respondents and parties should make any other proposals, or identify any other issues, that may facilitate potential RPS development in the Imperial Valley, or more generally throughout California. Such comment should include a clear statement of the proposal or issue, and any other information (including assertions of facts and law) reasonably needed for the Commission to make an informed decision on the proposal or issue.

(END OF ATTACHMENT A)

ATTACHMENT B

Staff Proposal to refine Project Viability Evaluation Methodology

Overview

Energy Division's staff proposal (Staff Proposal) outlines standardized criteria for assessing the viability of projects bid into the investor owned utilities' (IOUs') Renewables Portfolio Standard (RPS) solicitation. The Staff Proposal impacts three key components of the RPS program: 1) IOU procurement process, 2) Commission contract review and approval process and 3) IOU RPS flexible compliance provisions. Standardizing project viability criteria will increase consistency, transparency, and effectiveness of the RPS procurement process for IOUs, renewable developers, and the Commission.

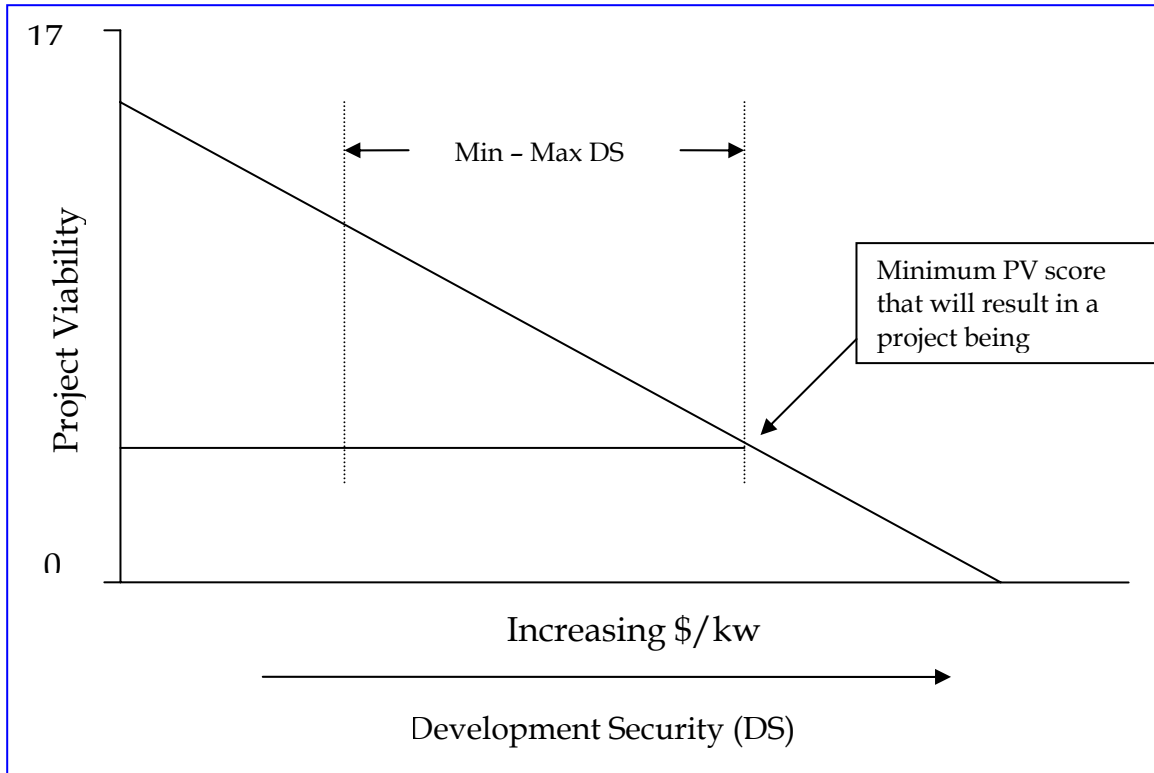
Staff proposal for the treatment of project viability

1. IOU Procurement Process

Purpose: To increase transparency and uniformity of the State's procurement of renewable energy through the IOUs' RPS solicitation process; ensure that projects with demonstrated indicia of viability are given appropriate weight in the Least Cost-Best Fit (LCBF) evaluation process; and tie project viability to credit and collateral requirements.

- a. Standardize Project Viability (PV) criteria for bid evaluation
 - i. Require all IOUs to use a standardized PV methodology that attributes a certain weighting to a minimum set of PV criteria.
 - See sample PV calculator (page 7 of Attachment B).
 - IOUs are allowed to modify the criteria weightings and/or add additional PV criteria, but may not delete any criteria. All changes to PV calculator must be identified in the IOU's bid evaluation materials for its solicitations and documented in the Independent Evaluator (IE) solicitation shortlist report.
 - IOUs are required to include the PV calculator in the solicitation bid package.
- b. Increase transparency regarding IOU's PV assessment of bids

- i. IOUs must identify in the public version of the advice letter, through which the IOU seeks approval of an RPS power purchase agreement (PPA):
 - Minimum, maximum, mean and median PV scores for shortlisted bids.
 - PPA-specific PV score (aggregate).
 - PPA-specific scores for PV criteria that are subsumed in the aggregate PV score.
 - ii. IOUs must include in the public version of the advice letter, the IE's PPA-specific report (public). The IE solicitation shortlist report (IE Report) must validate and/or discuss the IOU's representation of the proposed project's viability.
 - iii. IE must identify in the public version of the IE Report:
 - Minimum, maximum, mean and median PV scores for all bids.
 - Minimum, maximum, mean and median PV scores for shortlisted bids.
 - iv. IE must indicate in the confidential version of the IE Report, and PPA-specific IE Report, whether any project that was more viable was not shortlisted. If yes, the IE must explain why the project was not shortlisted and whether they agree with the IOU's decision not to shortlist the project.
- c. Link the PPA-specific PV score to PPA development security (DS)
- i. IOUs must identify in the solicitation bid package the level of development security required relative to a PPA-specific PV score. See below for a graphical representation (illustrative) of the relationship between PV and DS.



- ii. The above graph highlights the expectation that there would be a minimum and maximum DS. The DS would be greater than zero and less than some maximum number because a project with a PV score below a minimum threshold would not be shortlisted.

2. Commission contract review and approval process

Purpose: Establish minimum PV criteria for Commission approval and develop rules for amendments of approved contracts.¹

¹ The Staff Proposal focuses on procurement opportunities pursuant to the RPS solicitation process, which primarily concerns projects that rely on commercially demonstrated technologies. However, the RPS solicitation does not prohibit bids for

Footnote continued on next page

- a. Energy Division's contract review process primarily focuses on price, standard terms and conditions, and project viability. Staff reviews PPA price and contract terms and conditions pursuant to Commission decisions, while PV is assessed on a case by case basis. Standardized PV criteria should facilitate a more objective contract review process.
 - i. Energy Division will require a minimum PV score for Commission approval (for projects that utilize commercially demonstrated technology).
 - ii. Standardized PV criteria and standards will facilitate streamlined contract review, lowering regulatory risk.
- b. PPA-specific PV score determines the extent that a Commission-approved PPA can be amended by the IOU and its counterparty
 - i. Table below identifies 3 categories of PV
 - Contracts in Category A may not be approved by the Commission, and therefore, treatment of amendments is not applicable.
 - Contracts in Category B are eligible for approval but only limited amendments will be permitted once the Commission has approved the contract².
 - a. Amendments will be limited to terms and conditions that do not affect the cost to ratepayers (i.e., contract price), the proposed project's commercial online date (COD), or require Commission approval by resolution.

emerging technology projects, which inherently carry greater viability risk. The rules proposed here may not apply to emerging technology projects.

² While a Category B contract indicates significant development risk, this Commission does not intend to foreclose on any opportunities to achieve the State's RPS goal. However, Category B contracts will be approved (provided the contract is deemed reasonable), with conditions.

- Contracts in Category C are eligible for approval and are allowed major amendments if the buyer and seller can justify the amendments.
 - a. Major amendments could include, for example, price, project online date, and force majeure.
 - i. PPAs requiring a price amendment will have to submit to Energy Division appropriate documentation that justifies the change in price and/or COD.

Table 1: Contract Categories based on Project Viability Score

Project Viability Score	Eligible for CPUC Approval	PPA Amendments Permitted
Category A: 0 to 4	No	N/A
Category B: 5 to 9	Yes	limited amendments permitted
Category C: 10 to 17	Yes	major amendments permitted*

*only with appropriate documentation (e.g., cash-flow model etc)

- c. IOUs are required to apply standardized PV criteria to existing Commission-approved projects that are not forecast to be online within the next 6 months.
 - i. Approved PPAs (not commercially online) must be categorized as A, B, or C based on each project's aggregate PV score. How the project's PV is categorized will dictate whether PPA amendments will be allowed and to what extent.
3. IOU RPS Flexible Compliance

Purpose: Align IOU flexible compliance rules with project viability. Differentiating contracts by PV score may assist the Commission in determining the reasonableness of an IOU's request for flexible compliance.

- a. Pursuant to RPS legislation and Commission decisions, IOUs are authorized to use several reasons, with appropriate documentation, for justifying an RPS compliance deficit. The allowable reasons for non-compliance are:
 - i. Insufficient response to RFO;
 - ii. contracts already executed will provide future deliveries sufficient to satisfy current year deficits (earmarking);
 - iii. inadequate public goods funds to cover above-market costs;
 - iv. seller non-performance;
 - v. lack of effective competition;
 - vi. deferral promotes ratepayer interests and RPS objectives;
 - vii. showing of other good cause;
 - viii. insufficient transmission.
- b. Category A contracts have been identified as projects that face significant project development risk. Therefore, Category A contracts should not be relied upon for the purpose of compliance. Accordingly, Category A contracts may not be eligible for the excuse of seller non-performance to defer a current year deficit greater than 0.25 percent of the prior year's retail sales.
- c. Contracts classified as Category B and Category C projects may be eligible to use seller non-performance as a basis for deferring an RPS procurement deficit in appropriate circumstances.

Project Viability Calculator

The Project Viability Calculator quantifies project viability based on key project development milestones and barriers.

Project Viability Criteria	Project Score	Viability Scale	Notes
Developer Experience			
Total Years of Development Experience		0/1/2	<5 Yrs = 0, 5-15 Yrs=1, >15 Yrs=2
RFO Experience		0/1	Experienced in any RFO=1, None=0
Project Financing Experience		0/1	Yes=1, None=0
Facility Ownership Experience		0/1	Yes=1, None=0
Facility Operations Experience		0/1	Yes=1, None=0
Seller Concentration in RFO		-1/0	Yes=-1, None=0
<i>Developer Experience Score</i>		0-6	
Technical Viability			
Technology Development		0/1/2	Concept/Testing=0, Minor Install=1, Major Install=2
<i>Technical Viability Score</i>		0-2	
Project Viability			
Turbines, Solar Panels/Thermal, or Transformer Procurement		0/1	If either a Major Hurdle=0, Otherwise=1
Transmission Lead Time		0/1/2	Facility Study=2, Feasibility Study or System Impact Study=1, No Study=0
Project Development Lead Time		0/1	Reasonable=1, Otherwise=0
Network Upgrade or Interconnection: Scope and Cost		0/1	If either a Major Hurdle=0, Otherwise=1
Site Control		0/1/2	Achieved=2, OK=1, Major Hurdle=0
Permitting		0/1	OK=1, Major Hurdle=0
Pricing Structure		0/1	Indexed ⁴ to key development cost component(s)=1, Standard=0
<i>Project Viability Score</i>		0-9	
Total Project Viability Score		0-17	

⁴ For example, price may be indexed to turbine or solar panel prices, and/or an industry standard construction const indices. Long-term RPS contracts should not be indexed to gas prices.

(END OF ATTACHMENT B)

INFORMATION REGARDING SERVICE

I have provided notification of filing to the electronic mail addresses on the attached service list.

Upon confirmation of this document's acceptance for filing, I will cause a Notice of Availability of the filed document to be served upon the service list to this proceeding by U.S. mail. The service list I will use to serve the Notice of Availability of the filed document is current as of today's date.

Dated February 3, 2009, at San Francisco, California.

/s/ OYIN MILON

Oyin Milon