

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

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

Rulemaking 08-08-009

(Filed August 21, 2008)

**COMMENTS OF THE
LARGE-SCALE SOLAR ASSOCIATION
ON THE ENERGY DIVISION STAFF PROPOSAL FOR A
PROJECT VIABILITY CALCULATOR**

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I. Introduction and Summary

In response to the February 3, 2009, Energy Division (“ED”) staff proposal¹ on Renewable Portfolio Standard (“RPS”) procurement and the February 17th ED workshop to discuss that proposal, the Large-scale Solar Association (“LSA”) provides these comments.

LSA is a trade organization representing eleven of the nation’s largest developers and providers of utility-scale solar generating resources, collectively having over 5 gigawatts of clean, sustainable solar power under contract to California load-serving entities (“LSEs”). Its members represent various types of utility-scale solar technologies, including photovoltaic and solar thermal system designs. LSA, and its individual member companies, are leaders in the renewable energy industry, advancing solar generation technologies and advocating for competitive market structures that facilitate significant integration of renewable energy throughout the western United States. LSA is actively involved in California, Arizona, and Nevada as well as regional and federal venues when appropriate.

LSA appreciates the opportunity to comment on the ED Staff proposal, and supports ED Staff’s stated policy objectives of effectuating greater transparency in the RPS procurement process. It is important to note at the outset that renewable development in California is fraught with development-related hurdles. Even if it were possible to design a process that perfectly identified which projects have the greatest indicia of success at the time the contract is signed,

¹ R.08-08-009, *Assigned Commissioner Ruling Regarding Potential Renewable Portfolio Standard Development in Imperial Valley and Evaluation of Renewable Procurement Contracts* (Feb. 3, 2009), see Attachment B, available at: <http://docs.cpuc.ca.gov/efile/RULINGS/97168.pdf>

that process would do little to ensure that viable contracts are fulfilled and renewable power is actually delivered. In other words, while LSA acknowledges the valid goals of the ED proposal, even if constructed carefully, project viability assessments would primarily treat the symptom (contract non-performance), rather than the disease (development-related hurdles).

LSA believes that without modification, there is a significant risk that the viability calculator will pose an additional hurdle to renewable development. In moving forward with the ED proposal, LSA urges ED Staff to carefully address whether the benefit of heightened transparency in the RPS solicitation process outweighs the potential benefits of providing utilities with greater discretion to choose projects that may appear to have lower viability based on a predetermined set of criteria, but might ultimately better serve RPS goals and ratepayer interests. LSA suggests that to protect against disfavoring projects that are in fact viable but may not score well, the calculator results should not be dispositive of a project's likelihood of coming online. Instead the scores should be viewed as indicative, providing reason for further inquiry into a project's viability. In addition, LSA also offers its specific recommendations to make the calculator less ambiguous and to allow for a more accurate assessment of a project's likelihood of actually coming online.

II. Discussion

A. While LSA Supports Increasing Transparency Through Standardized Project Viability Scoring, LSA Is Concerned That Ambiguous Metrics May Cause Viable Projects To Be Disfavored.

Energy Division staff should carefully balance the overarching policy considerations of the ED proposal. Even though there is currently no standardized scoring methodology, the Investor Owned Utilities ("IOUs") nevertheless currently analyze the probability that a given project in the solicitation process will come online in accordance with the contractual terms. Standardizing

this process would provide transparent insight into the criteria that both IOUs and ED Staff use to evaluate viability. Standardization would also provide a means of testing whether those criteria actually correlate with performance. At the same time, the calculator would do little to remove the subjectivity in the viability analysis. Further, projects that do not fit well within the assumptions inherent in the viability scores may be disfavored, posing an additional impediment to otherwise viable projects in a process that is already fraught with hurdles. Indeed, by providing the appearance of an objectively calculated result, the calculator may do more harm than good.

One of the benefits of the discretion the IOUs currently have is that when the viability of a project is analyzed, IOUs can account for the spectrum of a project's attributes that make the project more or less likely to come online. While transparency is a valuable attribute in the RPS solicitation process, LSA believes that the viability calculator should be portrayed as indicative and not dispositive of a project's likelihood of coming online. That is, rather than using the results of the calculator to group contracts into categories with rigid limitations outlining how the contract may be treated by the utility or the Commission, the Commission should use such results as one factor in its overall assessment of the project. A low score should not constitute a verdict in its own right, but should instead serve only as reason to look more closely into the project's viability. For instance, if a project does not score well, the CPUC may decide to collect more information on a project to determine whether other project attributes not reflected in the calculator suggest the project is in fact viable. This information, along with evaluations of the relationship of the success of projects with their calculator score should be used to improve the calculator over time.

1. The Seller metric should be clarified to include a broad range of experience.

LSA is concerned that certain projects that are in fact viable would be unnecessarily disfavored by the ambiguous parameters of the project viability metrics. As discussed at the February 17th workshop, the calculus for seller renewable development related experience is troublesome. It is unclear to LSA whether the development experience would be evaluated based on the single-purpose entity that is likely the contracting counterparty, the company's history, the experience of the individuals on the project team, executive team, parent company, controlling shareholder or member of a joint venture.

Company experience alone is an inaccurate gauge of potential project success, even if parent companies are included. Company experience alone fails to account for both: 1) the disadvantage faced by companies that have been unable to retain their most successful and experienced staff; and 2) the benefit of startups led by highly experienced individuals. This is particularly true for LSA's membership. The solar industry is itself in a developmental stage, but has attracted many of the most talented and experienced development personnel in the energy field. Furthermore, several of LSA's member companies are in the process of commercializing new technologies at utility-scale for the first time. Almost by definition, the developer of the project in such an instance is also the developer of the technology, and has the greatest experience with that technology. A methodology that assesses only the experience of the "company" alone will fail to recognize the true qualifications which enable a company to bring projects to successful completion. Such qualification may come in the form of highly-experienced executives and staff, or funding partners with significant development experience.

The experience metric should be measured more broadly than the counterparty company's experience. Should ED Staff seek to preserve the experience metric, it should reflect the totality

of experience relevant to bring the project to successful completion, including the experience of the individuals on the project team, company executives, parent company and major investors.

2. The Development Issues metrics are vague.

The Development Issues metrics are vague in several regards. ED Staff should develop clarifying language as to what exactly is meant by “transmission lead time,” “project development lead time,” and “site control.” LSA recommends that the site control metric should be clarified to follow the California Independent System Operator Corporation (“CAISO”) Generator Interconnection Process Reform (“GIPR”) definition for “site control.”² Moreover, it is unclear at what point a development issue becomes a “major” hurdle. All, if not most of the issues identified in the calculator could be said to be hurdles for any renewable project, but the point at which the hurdle becomes “major” is a purely subjective judgment call. This issue merits further discussion.

3. The viability calculator should be re-weighted to favor the metrics most indicative of a project’s viability and a new category should be created to account for developer commitment.

LSA is concerned that the viability calculator weights too many metrics as equal, when certain issues tend to be far more indicative of a project’s likelihood to succeed than others. Specifically, developer commitment is directly related to the likelihood that a project will be brought online within the terms of a PPA. The more financial and human resources a company has devoted to a project, the more the company stands to lose if the project does not come online within the terms of the PPA. In fact, after extensive discussion, the CAISO GIPR process

² CAISO tariff § 25.3 defines “Site Control” to include: Documentation reasonably demonstrating: (1) ownership of, a leasehold interest in, or a right to develop a site for the purpose of constructing the Generating Facility; (2) an option to purchase or acquire a leasehold site for such purpose; or (3) an exclusivity or other business relationship between Interconnection Customer and the entity having the right to sell, lease or grant Interconnection Customer the right to possess or occupy a site for such purpose. The CAISO tariff is available at: <http://www.caiso.com/2012/2012c70a7880.pdf>

adopted an approach relying on deposits to reduce its queue to the projects most likely to come to completion. For instance, if a developer has the wherewithal to commit the \$250,000 necessary to remain in the CAISO queue, and therefore also the confidence that this commitment makes sense in light of its own assessment of its ability to succeed, then that project has demonstrated its likelihood of success to a greater degree than a project with no plans for transmission interconnection. Thus, LSA believes the most accurate viability factor is developer commitment, and that the standardized viability score should properly account for it. LSA recommends that a new section F be created that would account for factors including: 1) Permit applications (such as CEC AFC for thermal projects above 50 MW, or county equivalent for other resources) have been filed; 2) Whether the AFC is data adequate or the applicant has otherwise met all of the permitting requirements needed for review; 3) The amount of money spent on permitting, land acquisition, environmental and wildlife studies; and 4) The overall dollars spent on the project.

4. ED Staff should ensure that projects are only penalized once for an issue related to viability.

LSA is concerned that the calculator results may be distorted, as a single viability related issue may be “counted” under more than one metric within the proposal, leading to unfair and improper penalty. For example, site control is scored as a metric under A. “Development Issues,” and then again under B. “Site.” If ED Staff’s intention is to accord greater weight to certain viability criterion, then it is unclear why the IOUs would have the discretion to change the weighting of viability metrics. LSA does believe, as discussed above, that not all factors are equal and that proper weighting, based on the relationship of the factor to viability, is a necessity.

This weighting should utilize a clear multiplying factor to be consistent with the intent of providing a transparent evaluation process, rather than repeating values in different formulas.

B. If An Emerging Technology Bucket Is Created, ED Staff Should Avoid Creating A Renewable Ghetto Where Economically Viable Technologies Are Discouraged Solely Because They Are Not Assessed As Part Of The Standardized Renewable Project Viability Scoring.

LSA appreciates ED Staff's concern that certain untested technologies may be hindered by standardized viability scoring, and that an emerging technology bucket may help avoid this result. However, LSA believes that the presence of an emerging technology bucket may in and of itself hinder projects grouped into that bucket. It is unclear how, if at all the objectives of the standardized viability calculator (i.e. provide transparency and ensure viable projects are not unfairly excluded from the short list) would be applied to an emerging technology bucket. In other words, what would be done to ensure that viable projects characterized as emerging technologies are not excluded from the short list when these projects cannot be evaluated relative to non-emerging technologies that made the short list? To avoid creating a "renewable ghetto," ED staff should seek to create protective provisions for emerging technology projects similar to those of non-emerging technologies. For example, ED Staff should include in its proposal a requirement for independent evaluators and the IOUs to provide explanations for why viable emerging technologies did not make the short list, just as the proposal would call for such explanations as to non-emerging technology projects.

In addition, the emerging technology bucket should be narrowly defined to exclude projects that have been demonstrated and are currently in the process of becoming commercialized. Instead, the emerging technology bucket should be narrowly defined as: "a. projects less than 20MW," and "b. non-demonstrated projects and projects that are not currently undergoing

commercialization.” LSA’s primary concern here is that commercially viable solar technologies would be disfavored in the RPS process by virtue of being a relatively new technology.

III. Conclusion

LSA appreciates the opportunity to comment on the ED Staff proposal on the creation of a standardized project viability calculator, and applauds ED Staff’s efforts of creating greater transparency in the RPS solicitation process. LSA supports the notion that viable projects must not be disfavored in the short bid process. To this end, LSA recommends providing greater clarity in terms of how each viability metric is to be evaluated. Certain metrics should be weighted more heavily, such as developer commitment, based on their relative likelihood of contributing to success. Above all, ED Staff should seek to avoid the counterproductive result of discouraging viable projects through the use of ambiguous criteria, and should not allow the viability calculator to become a dispositive indicator of whether a project is viable.

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Respectfully submitted,



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CERTIFICATE OF SERVICE

I, Deric J. Wittenborn, am over the age of 18 years and employed in the City and County of Sacramento. My business address is 2600 Capitol Avenue, Suite 400, Sacramento, California 95816-5905.

On February 27, 2009, I served the within document **COMMENTS OF THE LARGE-SCALE SOLAR ASSOCIATION ON THE ENERGY DIVISION STAFF PROPOSAL FOR A PROJECT VIABILITY CALCULATOR**, in Rulemaking 08-08-009, with prescribed electronic service on the service list in R.08-08-009, with additional delivery by U.S. Mail of hard copies to President Peevey and Assigned Commissioner's ALJ's Simon and Mattson, at San Francisco, California.

Executed on February 27, 2009, at Sacramento, California.



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Proof of Service
Docket No. Rulemaking 08-08-009
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