

**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)

**MOTION OF THE CALIFORNIA WIND ENERGY ASSOCIATION AND THE LARGE-  
SCALE SOLAR ASSOCIATION FOR AN ORDER SHORTENING TIME TO RESPOND  
TO EMERGENCY MOTION SEEKING AN EXPEDITED ORDER ON CURTAILMENT  
ISSUES IN SCE'S 2010 RPS PROCUREMENT PLAN**

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February 16, 2010

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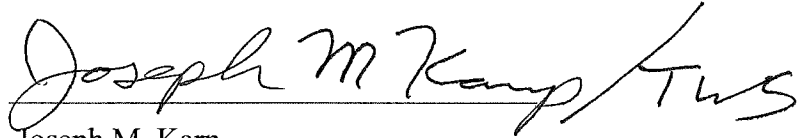
Pursuant to the California Public Utilities Commission's ("Commission") Rule of Practice and Procedure 11.1, the California Wind Energy Association ("CalWEA") and the Large-scale Solar Association ("LSA") respectfully request the issuance of an order shortening the time for any party to respond to the CalWEA/LSA Emergency Motion For An Expedited Order On Curtailment Issues In Southern California Edison's ("SCE") 2010 Renewables Portfolio Standard ("RPS") Procurement Plan (the "Motion").

As more fully described in the Motion, SCE's 2010 RPS Procurement Plan contains statements of SCE's interpretation of its curtailment rights under prior versions of its pro forma power purchase agreement ("PPA") and a set of proposed curtailment provisions to be included in its 2010 pro forma PPA that will significantly impair the ability of a project under contract to SCE and subject to these curtailment terms to obtain financing. In addition, CalWEA and LSA understand that many of these projects require access to the "cash grant" available under Section 1603 of the American Recovery and Reinvestment Act of 2009, which requires that a project commence construction by December 31, 2010, to remain economically viable. CalWEA and LSA request a ruling on the Motion on an expedited basis because delayed resolution of the

curtailment issues in SCE's 2010 RPS Procurement Plan will impair developers' ability to meet ARRA deadlines for eligibility for the cash grant and therefore impair project viability.

Accordingly, in order to facilitate a ruling on the Motion in a timely manner, CalWEA and LSA respectfully request that any party wishing to respond to the Motion be required to respond by February 22, 2010.

Respectfully submitted,



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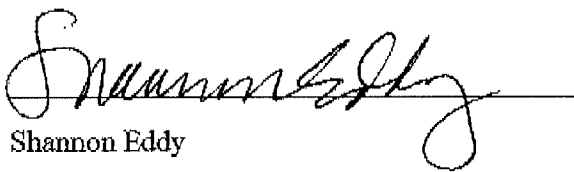
***Attorneys for the California Wind Energy Association  
and the Large-scale Solar Association***

## VERIFICATION

I, Shannon Eddy, am the Executive Director of the Large-scale Solar Association. I am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing copy of *Motion of the California Wind Energy Association and the Large-scale Solar Association For An Order Shortening Time To Respond To Emergency Motion Seeking An Expedited Order On Curtailment Issues In SCE's 2010 RPS Procurement Plan* are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 16, 2010 at Sacramento, California.



Shannon Eddy

Executive Director, Large-scale Solar Association

Attn: Tom Solomon - 415 591 1400

## VERIFICATION

I, Nancy Rader, am the Executive Director of the California Wind Energy Association. I am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing copy of *Motion of the California Wind Energy Association and the Large-scale Solar Association For An Order Shortening Time To Respond To Emergency Motion Seeking An Expedited Order On Curtailment Issues In SCE's 2010 RPS Procurement Plan* are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 16, 2010 at Berkeley, California.



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Nancy Rader

Executive Director, California Wind Energy Association

## Certificate of Service

I hereby certify that I have this day served a copy of the

**MOTION OF THE CALIFORNIA WIND ENERGY ASSOCIATION AND THE LARGE-SCALE SOLAR ASSOCIATION FOR AN ORDER SHORTENING TIME TO RESPOND TO EMERGENCY MOTION SEEKING AN EXPEDITED ORDER ON CURTAILMENT ISSUES IN SCE'S 2010 RPS PROCUREMENT PLAN**

on all known parties to R.08-08-009 by sending a copy via electronic mail and by mailing a properly addressed copy by first-class mail with postage prepaid to each party named in the official service list without an electronic mail address.

Executed on February 16, 2010, at San Francisco, California.



Marcus Hidalgo