

MIC Renewable Energy Holdings LLC

California Energy Commission

DOCKETED

11-RPS-01

TN # 74241

JAN 05 2015

July 8, 2014

California Energy Commission
Office of the Executive Director
1516 9th Street, MS-39
Sacramento, CA 95814-5512

RE: Requests for RPS Certification Application Deadline Extension

Dear Sir or Madam:

Attached to this cover are four separate requests for extension to the application deadline for RPS final certification. These four requests represent 4 distinct projects sited at two separate locations. All four projects were constructed simultaneously.

We point this out only to note that the reason for our deadline extension request is the same for all four projects, and though they are indeed 4 separate projects, administratively they were handled in parallel. We missed one step in our administrative process, and that mistake crossed all four projects.

We thank you in advance for considering our requests.

Best regards,



Bill Green
President
MIC Renewable Energy Holdings LLC
Sol Orchard San Diego 20 LLC
Direct: 415-640-5422

RECEIVED

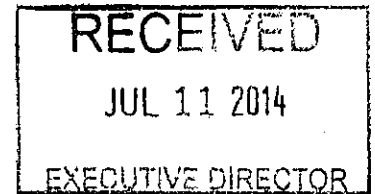
JUL 11 2014

EXECUTIVE DIRECTOR

MIC Renewable Energy Holdings LLC

July 8, 2014

California Energy Commission
Office of the Executive Director
1516 9th Street, MS-39
Sacramento, CA 95814-5512



RE: Request for RPS Certification Application Deadline Extension
61840C/A

Dear Sir or Madam:

I am writing to formally request an extension of the application deadline specified in the RPS Guidebook for submittal of the RPS-1 certification form used to convert a Pre-Certified generation facility to a fully Certified facility following the process outlined in the State of California, State Energy Resources Conservation and Development Commission Resolution No. 14-0422-11.

The information required as outlined in Section 3 a) through f) of the Resolution is detailed below:

- a) **Name of applicant and facility identifying information:** The name of the applicant is Bill Green, President, Sol Orchard San Diego 20, LLC, 125 West 55th Street, New York, NY 10019, bill.green@macquarie.com. The application forms were completed by Hugh Kuhn, hugh.kuhn@micrenewables.com who can be reached with any questions at 415-385-1614.

The name of the facility is Ramona 1 aka Sol Orchard San Diego 20 LLC and is identified by Pre-Certification number 61840C or Certification number 61840A. The address of the facility is 1650 Warnock Road, Ramona CA, 92065. The WREGIS registration number is W3863.

- b) **Extension requested:** Our updated RPS-1 form requesting final RPS certification was provided to the CEC RPS Certification department on June 9, 2014. Additional information was requested by the department, which has also been provided. We are requesting an extension of the deadline to submit a completed application of an additional 90 days (to June 30, 2014) from the 90-day window specified in the RPS Guidebook after commencement of Commercial Operations in the desire that our RPS Eligibility Date can be aligned with the project's actual COD date of 12/31/2013.
- c) **Explanation of circumstances:** MIC Renewable Energy Holdings missed the deadline to submit the updated RPS-1 form due to an internal oversight. The extensive interconnection and PPA compliance checklists we followed with San Diego Gas and Electric did not reference the need to resubmit RPS-1 although there were several other WREGIS, CAISO and DOE items on our lists. It was only when our asset manager was compiling and filing all project documents into a new data repository did we note that the

only CEC RPS document we had was a pre-certification. After that discovery we called the CEC RPS Certification team who verified that projects are required to submit an updated RPS-1 and indeed, they confirmed they had not received our updated RPS-1. This is our first series of solar projects with a California REC off-taker (SDG&E) and therefore our first time completing the CEC RPS process. We were unaware of the requirement, and simply put, an (important!) administrative ball was dropped.

- d) **Financial consequences:** We are contractually obligated to provide SDG&E with RPS Certified RECs as of 12/31/2013 (COD date and anniversary date of our PPA with them). Electricity production has been metered by SDG&E and provided to WREGIS and RECs have been provided by WREGIS to us and then assigned to SDG&E since COD. Financially, we could be obligated to backfill the non-RPS Certified RECs for SDG&E or, alternatively, we could be deemed in breach of our contractual obligations. Should the latter be the case clearly the financial consequences would be catastrophic.
- e) **Explanation of good cause to grant extension:** We understand that this request is a burden on the CEC RPS certification team and we apologize for our oversight. We respectfully request that the Executive Director consider this request because:
- a. Nothing material related to this solar power plant has changed since our initial RPS-1 pre-certification application and our error is administrative in nature only.
 - b. We have done everything else required to ensure that SDG&E receives the RECs they are expecting:
 - i. all CAISO process steps were completed in 2013,
 - ii. all SDG&E process steps were completed in 2013,
 - iii. the project's WREGIS registration was properly established,
 - iv. PIRP certification was achieved, and the project was pre-certified with the CEC.

Although our inexperience with the CEC process resulted in our failing to meet the this last 90-day-from-COD RPS-1 resubmittal requirement, we believe we have acted in good faith as outlined above and hope that we can work with the California Energy Commission, as outlined in Resolution No. 14-0422-11 (which acknowledges the significant financial and legal consequences projects may face for missing an application deadline) to address this oversight with the Commission through this formal request for extension.

We thank you in advance for considering our request.

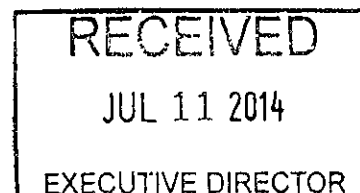
Best regards,



Bill Green
President

MIC Renewable Energy Holdings LLC
Sol Orchard San Diego 20 LLC

MIC Renewable Energy Holdings LLC



July 8, 2014

California Energy Commission
Office of the Executive Director
1516 9th Street, MS-39
Sacramento, CA 95814-5512

RE: Request for RPS Certification Application Deadline Extension
62435C/A

Dear Sir or Madam:

I am writing to formally request an extension of the application deadline specified in the RPS Guidebook for submittal of the RPS-1 certification form used to convert a Pre-Certified generation facility to a fully Certified facility following the process outlined in the State of California, State Energy Resources Conservation and Development Commission Resolution No. 14-0422-11.

The information required as outlined in Section 3 a) through f) of the Resolution is detailed below:

- a) **Name of applicant and facility identifying information:** The name of the applicant is Bill Green, President, Sol Orchard San Diego 21, LLC, 125 West 55th Street, New York, NY 10019, bill.green@macquarie.com. The application forms were completed by Hugh Kuhn, hugh.kuhn@micrenewables.com who can be reached with any questions at 415-385-1614.

The name of the facility is Ramona 2 aka Sol Orchard San Diego 21 LLC and is identified by Pre-Certification number 62435C or Certification number 62435A. The address of the facility is 1650 Warnock Road, Ramona CA, 92065. The WREGIS registration number is W3864.

- b) **Extension requested:** Our updated RPS-1 form requesting final RPS certification was provided to the CEC RPS Certification department on June 9, 2014. Additional information was requested by the department, which has also been provided. We are requesting an extension of the deadline to submit a completed application of an additional 90 days (to June 30, 2014) from the 90-day window specified in the RPS Guidebook after commencement of Commercial Operations in the desire that our RPS Eligibility Date can be aligned with the project's actual COD date of 12/31/2013.
- c) **Explanation of circumstances:** MIC Renewable Energy Holdings missed the deadline to submit the updated RPS-1 form due to an internal oversight. The extensive interconnection and PPA compliance checklists we followed with San Diego Gas and Electric did not reference the need to resubmit RPS-1 although there were several other WREGIS, CAISO and DOE items on our lists. It was only when our asset manager was compiling and filing all project documents into a new data repository did we note that the

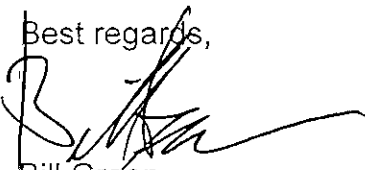
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- d) **Financial consequences:** We are contractually obligated to provide SDG&E with RPS Certified RECs as of 12/31/2013 (COD date and anniversary date of our PPA with them). Electricity production has been metered by SDG&E and provided to WREGIS and RECs have been provided by WREGIS to us and then assigned to SDG&E since COD. Financially, we could be obligated to backfill the non-RPS Certified RECs for SDG&E or, alternatively, we could be deemed in breach of our contractual obligations. Should the latter be the case clearly the financial consequences would be catastrophic.
- e) **Explanation of good cause to grant extension:** We understand that this request is a burden on the CEC RPS certification team and we apologize for our oversight We respectfully request that the Executive Director consider this request because:
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 - b. We have done everything else required to ensure that SDG&E receives the RECs they are expecting:
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 - ii. all SDG&E process steps were completed in 2013,
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Although our inexperience with the CEC process resulted in our failing to meet the this last 90-day-from-COD RPS-1 resubmittal requirement, we believe we have acted in good faith as outlined above and hope that we can work with the California Energy Commission, as outlined in Resolution No. 14-0422-11 (which acknowledges the significant financial and legal consequences projects may face for missing an application deadline) to address this oversight with the Commission through this formal request for extension.

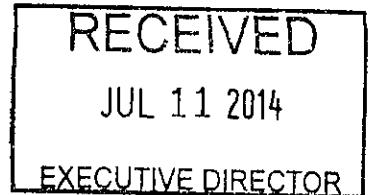
We thank you in advance for considering our request.

Best regards,



Bill Green
President
MIC Renewable Energy Holdings LLC
Sol Orchard San Diego 21 LLC

MIC Renewable Energy Holdings LLC



July 8, 2014

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RE: Request for RPS Certification Application Deadline Extension
61839C/A

Dear Sir or Madam:

I am writing to formally request an extension of the application deadline specified in the RPS Guidebook for submittal of the RPS-1 certification form used to convert a Pre-Certified generation facility to a fully Certified facility following the process outlined in the State of California, State Energy Resources Conservation and Development Commission Resolution No. 14-0422-11.

The information required as outlined in Section 3 a) through f) of the Resolution is detailed below:

- a) **Name of applicant and facility identifying information:** The name of the applicant is Bill Green, President, Sol Orchard San Diego 22, LLC, 125 West 55th Street, New York, NY 10019, bill.green@macquarie.com. The application forms were completed by Hugh Kuhn, hugh.kuhn@micrenewables.com who can be reached with any questions at 415-385-1614.

The name of the facility is Valley Center 1 aka Sol Orchard San Diego 22 LLC and is identified by Pre-Certification number 61839C or Certification number 61839A. The address of the facility is 15155 Vesper Road, Valley Center CA, 92082. The WREGIS registration number is W3865.

- b) **Extension requested:** Our updated RPS-1 form requesting final RPS certification was provided to the CEC RPS Certification department on June 9, 2014. Additional information was requested by the department, which has also been provided. We are requesting an extension of the deadline to submit a completed application of an additional 90 days (to June 30, 2014) from the 90-day window specified in the RPS Guidebook after commencement of Commercial Operations in the desire that our RPS Eligibility Date can be aligned with the project's actual COD date of 12/31/2013.
- c) **Explanation of circumstances:** MIC Renewable Energy Holdings missed the deadline to submit the updated RPS-1 form due to an internal oversight. The extensive interconnection and PPA compliance checklists we followed with San Diego Gas and Electric did not reference the need to resubmit RPS-1 although there were several other WREGIS, CAISO and DOE items on our lists. It was only when our asset manager was compiling and filing all project documents into a new data repository did we note that the

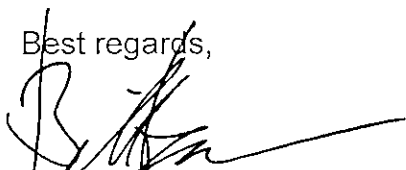
only CEC RPS document we had was a pre-certification. After that discovery we called the CEC RPS Certification team who verified that projects are required to submit an updated RPS-1 and indeed, they confirmed they had not received our updated RPS-1. This is our first series of solar projects with a California REC off-taker (SDG&E) and therefore our first time completing the CEC RPS process. We were unaware of the requirement, and simply put, an (important!) administrative ball was dropped.

- d) **Financial consequences:** We are contractually obligated to provide SDG&E with RPS Certified RECs as of 12/31/2013 (COD date and anniversary date of our PPA with them). Electricity production has been metered by SDG&E and provided to WREGIS and RECs have been provided by WREGIS to us and then assigned to SDG&E since COD. Financially, we could be obligated to backfill the non-RPS Certified RECs for SDG&E or, alternatively, we could be deemed in breach of our contractual obligations. Should the latter be the case clearly the financial consequences would be catastrophic.
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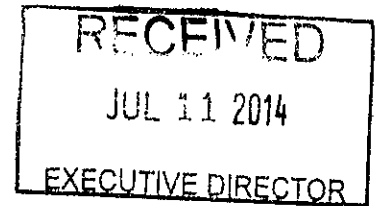
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Best regards,



Bill Green
President
MIC Renewable Energy Holdings LLC
Sol Orchard San Diego 22 LLC

MIC Renewable Energy Holdings LLC



July 8, 2014

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Sacramento, CA 95814-5512

RE: Request for RPS Certification Application Deadline Extension
62436C/A

Dear Sir or Madam:

I am writing to formally request an extension of the application deadline specified in the RPS Guidebook for submittal of the RPS-1 certification form used to convert a Pre-Certified generation facility to a fully Certified facility following the process outlined in the State of California, State Energy Resources Conservation and Development Commission Resolution No. 14-0422-11.

The information required as outlined in Section 3 a) through f) of the Resolution is detailed below:

- a) **Name of applicant and facility identifying information:** The name of the applicant is Bill Green, President, Sol Orchard San Diego 23, LLC, 125 West 55th Street, New York, NY 10019, bill.green@macquarie.com. The application forms were completed by Hugh Kuhn, hugh.kuhn@micrenewables.com who can be reached with any questions at 415-385-1614.

The name of the facility is Valley Center 2 aka Sol Orchard San Diego 23 LLC and is identified by Pre-Certification number 62436C or Certification number 62436A. The address of the facility is 15155 Vesper Road, Valley Center CA, 92082. The WREGIS registration number is W3866.

- b) **Extension requested:** Our updated RPS-1 form requesting final RPS certification was provided to the CEC RPS Certification department on June 9, 2014. Additional information was requested by the department, which has also been provided. We are requesting an extension of the deadline to submit a completed application of an additional 90 days (to June 30, 2014) from the 90-day window specified in the RPS Guidebook after commencement of Commercial Operations in the desire that our RPS Eligibility Date can be aligned with the project's actual COD date of 12/31/2013.
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