

## DOCKETED

<b>Docket Number:</b>	11-RPS-01
<b>Project Title:</b>	Renewables Portfolio Standard
<b>TN #:</b>	207113
<b>Document Title:</b>	Pristine Sun Request for Extension of Time on Final Certification
<b>Description:</b>	N/A
<b>Filer:</b>	Patty Paul
<b>Organization:</b>	Pristine Sun, LLC
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	12/24/2015 9:56:06 AM
<b>Docketed Date:</b>	12/22/2015



Pristine Sun, LLC  
101 Mission Street  
Suite 1050  
San Francisco, CA 94105



Tuesday, October 27, 2015

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

Dear Executive Director,

I am writing to you concerning the final certification for facility 2065 Rogers located at 9401 Rogers Ct., Gerber, CA 96035 with CEC-RPS ID number 62060A. We would like to request the effective date on the final certification to change from December 23, 2013 to July 12, 2013 or a date before July 2013.

We are requesting this change because our utility, Pacific Gas & Electric (PG&E), who we sell energy to, informed us that they are not accepting our Renewable Energy Credits (RECs) given to them before December 2013. According to PG&E, the RECs we provided to them from August to November 2013 were not CEC certified and thus not in compliance with the California Renewables Portfolio Standard. Because of this, we violated the terms in our agreement with PG&E which requires all RECs delivered to be CEC certified. As a result, they recently notified us that we owe them a significant amount of money unless the effective date can be changed on the final certification document.

Attached to this letter is an email and document from PG&E which will support the information provided.

Please consider our request and send us a new final certification as the payment we owe to PG&E will put a financial burden on our company. If you have any questions please contact me at [alexander.li@pristinesun.com](mailto:alexander.li@pristinesun.com) or (415) 848-8143.

Sincerely,

A handwritten signature in black ink that reads "Alexander Li".

Alexander Li  
Asset Analyst



Pristine Sun, LLC  
101 Mission Street  
Suite 1050  
San Francisco, CA 94105



Tuesday, October 27, 2015

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

Dear Executive Director,

I am writing to you concerning the final certification for facility 2103 Hill located at 5475 Jack Creek Road, Templeton, CA 93465 with CEC-RPS ID number 62066A. We would like to request the effective date on the final certification to change from June 3, 2014 to February 20, 2014 or a date before February 2014.

We are requesting this change because our utility, Pacific Gas & Electric (PG&E), who we sell energy to, informed us that they are not accepting our Renewable Energy Credits (RECs) given to them before June 2014. According to PG&E, the RECs we provided to them from February to May 2014 were not CEC certified and thus not in compliance with the California Renewables Portfolio Standard. Because of this, we violated the terms in our agreement with PG&E which requires all RECs delivered to be CEC certified. As a result, they recently notified us that we owe them a significant amount of money unless the effective date can be changed on the final certification document.

Attached to this letter is an email and document from PG&E which will support the information provided.

Please consider our request and send us a new final certification as the payment we owe to PG&E will put a financial burden on our company. If you have any questions please contact me at [alexander.li@pristinesun.com](mailto:alexander.li@pristinesun.com) or (415) 848-8143.

Sincerely,

A handwritten signature in black ink that reads "Alex Li".

Alexander Li  
Asset Analyst

G

## Alexander Li

---

**From:** Patrick Lynch  
**Sent:** Monday, October 26, 2015 10:41 AM  
**To:** Alexander Li  
**Subject:** FW: Action requested - Pristine Sun Rogers CEC RPS certification  
**Attachments:** 20151023\_PristineSunRogers\_WREGISCertificateDeficit.pdf; 20151023\_PristineSunHill\_WREGISCertificateDeficit.pdf

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**From:** Salinas, Andrew H. [mailto:AHS0@pge.com]  
**Sent:** Friday, October 23, 2015 4:06 PM  
**To:** Troy Helming <troy.helming@pristinesun.com>; Peter Coughlin <peter.coughlinsr@pristinesun.com>; Patrick Lynch <patrick.lynch@pristinesun.com>  
**Cc:** Iwahashi, Greg <Gxl6@pge.com>  
**Subject:** RE: Action requested - Pristine Sun Rogers CEC RPS certification

Troy, Peter, and Patrick,

To follow-up on this request, please find the attached letters for the Pristine Sun Rogers and Pristine Sun Hill facilities. The RECs associated with the delivery of energy from December 2013 for Pristine Sun Rogers and June 2014 for Pristine Sun Hill are not in compliance with the California Renewables Portfolio Standard. Therefore, a WREGIS Certificate Deficit exists for both projects.

Please let me know if you have any questions.

Best,  
**Andrew Salinas**  
Contract Management Analyst, Associate | Developing Generation  
Energy Procurement | Pacific Gas & Electric Company  
415-973-4645 | [AHS0@pge.com](mailto:AHS0@pge.com)

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**From:** Iwahashi, Greg  
**Sent:** Wednesday, September 23, 2015 9:38 AM  
**To:** [troy.helming@pristinesun.com](mailto:troy.helming@pristinesun.com); [peter.coughlinsr@pristinesun.com](mailto:peter.coughlinsr@pristinesun.com); [Patrick.Lynch@pristinesun.com](mailto:Patrick.Lynch@pristinesun.com)  
**Cc:** Salinas, Andrew H.  
**Subject:** Action requested - Pristine Sun Rogers CEC RPS certification

Hi Troy, Peter, and Patrick,

**Action requested** - Apply for an "Extensions of Certification Application Deadlines" on page 74:  
<http://www.energy.ca.gov/2015publications/CEC-300-2015-001/CEC-300-2015-001-ED8-CMF.pdf>

**Background:** The Facility known as Pristine Sun Rogers (33R178AB) has a CEC RPS certification effective date of 12/23/13. However, the facility has been paid for generation dating back to August 1, 2013. RECs have been created starting on 8/1/13, but they are not RPS eligible until 12/23/13 due to the CEC RPS certification application being late. The CEC extension process above, may allow the CEC RPS certification to include generation prior to 12/23/13.

Per section 3.1 of the PPA, the Green Attributes are a part of the Product associated with the purchases from 8/1/13-12/22/13 owed to the Buyer, and therefore, the Seller has not delivered the Product to Buyer. Failure to deliver the Product to Buyer may result in withholding from a future invoice.

If you have any questions, please let me know.

Best,

**Gregory Iwahashi**

Contract Management Analyst | Developing Generation

Energy Procurement | Pacific Gas and Electric Co.

415.973.0799 | [Gxi6@pge.com](mailto:Gxi6@pge.com)



October 23, 2015

Troy Helming  
Pristine Sun Fund 5 LLC  
101 Mission St., 10<sup>th</sup> Floor  
San Francisco, CA 94105

**Subject: Pristine Sun Fund 5 LLC (PG&E Log No.33R178AB) WREGIS Certificate Deficit**

Dear Troy Helming,

Pacific Gas and Electric Company ("PG&E" or "Buyer") and Pristine Sun Fund 5 LLC ("Seller") are parties to a Power Purchase Agreement with an Execution Date of August 17, 2011 ("Agreement") for the 2065-Rogers Facility ("Pristine Sun Rogers"). All capitalized terms not defined herein shall have the meaning set forth in the Agreement.

Pristine Sun Rogers had a Initial Energy Delivery Date of July 12, 2013, which began the Delivery Term of the Agreement. In accordance with section 4.3.1(d) of the Agreement, "Seller . . . represents and warrants that throughout the Delivery Term of this Agreement the Renewable Energy Credits transferred to Buyer conform to the definition and attributes required for compliance with the California Renewables Portfolio Standard."

Based on the CEC RPS Certification, the RPS eligibility of the facility began on December 23, 2013. Therefore, the Renewable Energy Credits (RECs) associated with the delivery of energy from the Project before December 2013 are not in compliance with the California Renewables Portfolio Standard and therefore the Seller has not met its obligations under Sections 3.1 and 3.2 of the Agreement, which require Seller to transfer all Green Attributes, including WREGIS Certificates, from the facility to PG&E corresponding to the delivery of all energy from the Project. Seller has not delivered acceptable WREGIS Certificates to Buyer for the following periods:

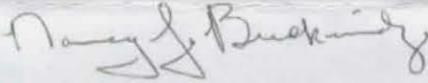
REC Vintage	Deficit (RECs - MWh)
2013/08	(70)
2013/09	(52)
2013/10	(48)
2013/11	(29)

Therefore, a WREGIS Certificate Deficit exists for the aforementioned periods.

Based on the amount of the WREGIS Certificate Deficit for August – November 2013, the amount owed to PG&E as the result of the deficits is \$30,370.16. Beginning with the next billing cycle (the invoice for energy delivered in October 2015), PG&E will reduce future payments to Seller until this amount owed has been recouped.

If you have any questions about this letter, please contact Andrew Salinas at [AHS0@pge.com](mailto:AHS0@pge.com) or at (415) 973-4645.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nancy J. Breckenridge".

Nancy Breckenridge  
Manager, Contracts and Reporting  
Energy Contract Management



October 23, 2015

Troy Helming  
Pristine Sun Fund 5 LLC  
101 Mission St., 10<sup>th</sup> Floor  
San Francisco, CA 94105

**Subject: Pristine Sun Fund 5 LLC (PG&E Log No.33R204AB) WREGIS Certificate Deficit**

Dear Troy Helming,

Pacific Gas and Electric Company ("PG&E" or "Buyer") and Pristine Sun Fund 5 LLC ("Seller") are parties to a Power Purchase Agreement with an Execution Date of August 31, 2011 ("Agreement") for the 2103-Hill Facility ("Pristine Sun Hill"). All capitalized terms not defined herein shall have the meaning set forth in the Agreement.

Pristine Sun Hill had a Initial Energy Delivery Date of February 20, 2014, which began the Delivery Term of the Agreement. In accordance with section 4.3.1(d) of the Agreement, "Seller . . . represents and warrants that throughout the Delivery Term of this Agreement the Renewable Energy Credits transferred to Buyer conform to the definition and attributes required for compliance with the California Renewables Portfolio Standard."

Based on the CEC RPS Certification, the RPS eligibility of the facility began on June 3, 2014. Therefore, the Renewable Energy Credits ("RECs") associated with the delivery of energy from the Project before June 2014 are not in compliance with the California Renewables Portfolio Standard. Therefore, the Seller has not met its obligations under Sections 3.1 and 3.2 of the Agreement, which require Seller to transfer all Green Attributes, including WREGIS Certificates, from the facility to PG&E corresponding to the delivery of all energy from the Project. Seller has not delivered acceptable WREGIS Certificates to Buyer for the following periods:

REC Vintage	Deficit (RECs - MWh)
2014/02	(12)
2014/03	(5)
2014/05	(64)

Therefore, a WREGIS Certificate Deficit exists for the aforementioned periods.

Based on the amount of the WREGIS Certificate Deficit for February, March, and May 2014, the amount owed to PG&E as the result of the deficits is \$9,434.03. Beginning with the next billing cycle (the invoice for energy delivered in October 2015), PG&E will reduce future payments to Seller until this amount owed has been recouped.

If you have any questions about this letter, please contact Andrew Salinas at [AHS0@pgc.com](mailto:AHS0@pgc.com) or at (415) 973-4645.

Sincerely,

A handwritten signature in cursive script that reads "Nancy Breckenridge". The signature is written in black ink and is positioned above the typed name.

Nancy Breckenridge  
Manager, Contracts and Reporting  
Energy Contract Management

## Alexander Li

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**From:** Patrick Lynch  
**Sent:** Monday, October 26, 2015 10:41 AM  
**To:** Alexander Li  
**Subject:** FW: Action requested - Pristine Sun Rogers CEC RPS certification  
**Attachments:** 20151023\_PristineSunRogers\_WREGISCertificateDeficit.pdf; 20151023\_PristineSunHill\_WREGISCertificateDeficit.pdf

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**From:** Salinas, Andrew H. [mailto:AHS0@pge.com]  
**Sent:** Friday, October 23, 2015 4:06 PM  
**To:** Troy Helming <troy.helming@pristinesun.com>; Peter Coughlin <peter.coughlinsr@pristinesun.com>; Patrick Lynch <patrick.lynnch@pristinesun.com>  
**Cc:** Iwahashi, Greg <Gxl6@pge.com>  
**Subject:** RE: Action requested - Pristine Sun Rogers CEC RPS certification

Troy, Peter, and Patrick,

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Please let me know if you have any questions.

Best,  
**Andrew Salinas**  
Contract Management Analyst, Associate | Developing Generation  
Energy Procurement | Pacific Gas & Electric Company  
415-973-4645 | [AHS0@pge.com](mailto:AHS0@pge.com)

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**From:** Iwahashi, Greg  
**Sent:** Wednesday, September 23, 2015 9:38 AM  
**To:** [troy.helming@pristinesun.com](mailto:troy.helming@pristinesun.com); [peter.coughlinsr@pristinesun.com](mailto:peter.coughlinsr@pristinesun.com); [Patrick.Lynch@pristinesun.com](mailto:Patrick.Lynch@pristinesun.com)  
**Cc:** Salinas, Andrew H.  
**Subject:** Action requested - Pristine Sun Rogers CEC RPS certification

Hi Troy, Peter, and Patrick,

Action requested - Apply for an "Extensions of Certification Application Deadlines" on page 74:  
<http://www.energy.ca.gov/2015publications/CEC-300-2015-001/CEC-300-2015-001-ED8-CMF.pdf>

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If you have any questions, please let me know.

Best,

**Gregory Iwahashi**

Contract Management Analyst | Developing Generation  
Energy Procurement | Pacific Gas and Electric Co.  
415.973.0799 | [Gxi6@pge.com](mailto:Gxi6@pge.com)

## Crume, Christina@Energy

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**From:** Alexander Li <alexander.li@pristinesun.com>  
**Sent:** Wednesday, November 18, 2015 10:12 AM  
**To:** Crume, Christina@Energy  
**Subject:** RE: RPS Certification Time Extension Request

Hi Christina,

These projects were not submitted on time compared to other applications because we did not know that the effective dates on the certifications were vital when transferring Renewable Energy Credits (RECs) to the utility, PG&E. PG&E did not communicate to us that the effective dates were important in ensuring the RECs were CEC certified until recently. They solely emphasized that the final certification was the only thing they needed. As a result, submitting projects for CEC certification in the past were not done with a sense of urgency and unfortunately this affected 2065 Rogers and 2103 Hill. Going forwards we will ensure this will not occur again as we are more familiar with the PG&E and CEC terms.

Regards,

Alexander Li, Asset Analyst, *Pristine Sun, LLC and subsidiaries*



[Alexander.Li@pristinesun.com](mailto:Alexander.Li@pristinesun.com) | W 415.848.8143

**OUR ADDRESS CHANGED!**

101 Mission St, Suite 1050, San Francisco, CA 94105

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**From:** Crume, Christina@Energy [<mailto:Christina.Crume@energy.ca.gov>]  
**Sent:** Thursday, November 12, 2015 7:24 AM  
**To:** Alexander Li <[alexander.li@pristinesun.com](mailto:alexander.li@pristinesun.com)>  
**Subject:** RE: RPS Certification Time Extension Request

Hi Alexander,

Can you provide more explanation on how Pristine Sun failed to submit an application for these facilities when applications were submitted for other Pristine Sun facilities during the same timeframe.

Best,

Christina

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**From:** Alexander Li [<mailto:alexander.li@pristinesun.com>]  
**Sent:** Friday, November 06, 2015 11:16 AM  
**To:** Crume, Christina@Energy  
**Subject:** RE: RPS Certification Time Extension Request

Hi Christina,

Please see my responses to items #3 and #5 for facilities 2065 Rogers and 2103 Hill.

3. As a startup company, Pristine Sun has gone through many changes including the *resignations and hiring of* employees. As such, former employees responsible for submitting the CEC applications did not train current ones nor made them privy to the CEC guidelines that had to be followed. This caused a delay in workflow and resulted in the certification applications to not be submitted in a timely fashion.

5. Granting a time extension would be extremely helpful as the money we save from PG&E will go towards further developing our solar projects. As a small company, this cash would allow Pristine Sun to achieve their goal of providing renewable energy across the United States and to promote the use of cleaner energy. In addition, we are currently engaged with investors who want to finance our projects however they cannot as these facilities require additional development. The money we save from PG&E would greatly help Pristine Sun satisfy this requirement as we are currently tight on cash.

Thank you for considering our request and we hope this can be resolved.

Regards,

Alexander Li, Asset Analyst, *Pristine Sun, LLC and subsidiaries*



[Alexander.Li@pristinesun.com](mailto:Alexander.Li@pristinesun.com) | W 415.848.8143

**OUR ADDRESS CHANGED!**

101 Mission St, Suite 1050, San Francisco, CA 94105

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**From:** Crume, Christina@Energy [<mailto:Christina.Crume@energy.ca.gov>]

**Sent:** Wednesday, November 04, 2015 8:04 AM

**To:** Alexander Li <[alexander.li@pristinesun.com](mailto:alexander.li@pristinesun.com)>

**Subject:** RPS Certification Time Extension Request

Hello,

The Executive Director has received your letter for the time extension request for the 2065 Rogers and 2103 Hill facilities on October 30, 2015 and their office is currently reviewing the request. In addition, sometimes the Executive Director seek staff recommendation and in order to assist you please provide missing information to your explanation of the circumstances why Pristine Sun was unable to submit a timely application for certification (item #3) and the explanation of good cause for granting the time extension request (item #5).

For more information, please refer to the *RPS Eligibility Guidebook, Eighth Edition*, pages 74-76.

<http://www.energy.ca.gov/2015publications/CEC-300-2015-001/CEC-300-2015-001-ED8-CMF.pdf>

Let me know if you have any questions.

Thank you.

*Christina Crume*

RPS Certification

Renewable Energy Division

California Energy Commission

1516 9<sup>th</sup> Street MS – 45  
Sacramento, CA 95814  
916-654-4674  
[christina.crume@energy.ca.gov](mailto:christina.crume@energy.ca.gov)