

DOCKETED

Docket Number:	11-RPS-01
Project Title:	Renewables Portfolio Standard
TN #:	210736
Document Title:	Letter and documents from Southern California Edison Regarding Salton Sea Request for Extension and Waiver
Description:	Letter and documents from Southern California Edison requesting an extension and waiver of RPS certification application deadlines to reinstate the original RPS eligibility date of April 5, 2005 for three Salton Sea geothermal facilities: Salton Sea Power Generation Co. #3, Salton Sea Power Generation Co. #1 and Salton Sea Power Generation Co. #4.
Filer:	Judi Carter
Organization:	Southern California Edison
Submitter Role:	Public
Submission Date:	3/15/2016 2:40:24 PM
Docketed Date:	3/15/2016



February 10, 2016

Robert Oglesby
Executive Director
California Energy Commission
1516 9th Street, MS-39
Sacramento, CA 95814-5512

Dear Mr. Oglesby:

Southern California Edison Company (SCE) is requesting an extension and waiver of Renewables Portfolio Standard (RPS) certification application deadlines to reinstate the original RPS eligibility date of April 5, 2005 for three Salton Sea geothermal facilities: 60317A – Salton Sea Power Generation Co #3, 60323A – Salton Sea Power Generation Co #1, and 60324A – Salton Sea Power Generation Co #4 (the Salton Sea facilities).

As shown in the attached RPS eligibility certifications, the three Salton Sea facilities were certified by the California Energy Commission (Energy Commission) as RPS eligible effective April 5, 2005. The Salton Sea facilities are all delivering energy to SCE under 30-year qualifying facility power purchase agreements (PPAs) that have been in effect since before 2005. The three PPAs are attached to this letter. None of these PPAs have been terminated. All three Salton Sea facilities have been in SCE's portfolio since before 2005 and are still delivering under their original PPAs.

In 2011, it came to SCE's attention that the RPS certifications for the Salton Sea facilities were disapproved as of October 2008. After communications with Energy Commission Staff in 2012, as shown in the attached emails, SCE learned that the RPS certifications for the Salton Sea facilities were disapproved because the Energy Commission had mistakenly classified the facilities' PPAs as terminated as of October 2008. In fact, the Salton Sea facilities' PPAs were not terminated. The Salton Sea facilities are still delivering pursuant to the same PPAs with SCE as they were when the facilities were utility-certified effective April 5, 2005. It is not clear to SCE why the Energy Commission classified the Salton Sea facilities' PPAs as terminated. SCE believes the classification may have been an administrative error because the RPS certifications for the Salton Sea facilities were changed to disapproved effective October 2008, one day after the September 30, 2008 issuance of the RPS eligibility certifications stating the facilities were RPS eligible beginning on April 5, 2005.

In 2012, SCE worked with Energy Commission Staff to resolve the mistaken disapproval of the Salton Sea facilities' RPS certifications. At the request of Energy Commission Staff, SCE resubmitted RPS certification applications for the three Salton Sea facilities in May 2012. Given that the Salton Sea facilities' PPAs had not terminated, SCE did not believe this would change the RPS eligibility dates for the facilities. The Salton Sea facilities' RPS certifications were eventually reinstated. Unfortunately, this further complicated the situation by resetting the RPS eligibility dates for the facilities to May 7, 2012, the application processing date for the resubmitted applications, rather than the original April 5, 2005 RPS eligibility date. SCE recently became aware of this problem during the verification process for 2011-2013 generation when Energy Commission Staff preliminarily determined that SCE's generation from the Salton Sea facilities from 2011 through April 2012 (which amounts to approximately 1,000,000 MWh) is ineligible because of the facilities' May 7, 2012 RPS eligibility date.

SCE is requesting that the Energy Commission grant an extension and waiver and reinstate the April 5, 2005 RPS eligibility date for the Salton Sea facilities. An April 5, 2005 RPS eligibility date for the Salton Sea facilities is fully consistent with the rules set forth in the Energy Commission's RPS Eligibility Guidebooks. The Salton Sea facilities' RPS certifications were approved by the Energy Commission effective as of April 5, 2005 and the 2008 disapproval of those certifications was in error. The Salton Sea facilities have continued to operate under the same long-term PPAs with SCE since they were utility-certified as RPS eligible. Moreover, the Salton Sea facilities are geothermal facilities located in the Salton Sea region that meet all requirements for RPS eligibility. SCE's customers have also paid hundreds of millions of dollars for generation from the Salton Sea facilities and should receive RPS credit for the generation they paid for. For all these reasons, Salton Sea facilities' RPS eligibility date should be reinstated.

SCE would like to work with Energy Commission Staff to remedy these issues. Please see the following information required by the Eighth Edition of the RPS Eligibility Guidebook.

1. The name and address of the applicant and the name, location, and other identifying information of the electrical generation facility for which the applicant has or will seek RPS certification, including any certification or precertification ID numbers issued by the Energy Commission and any WREGIS registration numbers.

Southern California Edison is the applicant for all three applications (filed by Barry Gilman), with address 2244 Walnut Grove Avenue, Rosemead, CA 91770. Other identifying information unique to each facility are listed separately below.

- a. RPS ID # 60317A – Salton Sea Power Generation Co #3; 6922 Crummer Roads, Calipatria, CA 92233; WREGIS ID # W455

- b. RPS ID # 60323A – Salton Sea Power Generation Co #1; 6920 Lack Road, Calipatria, CA 92233; WREGIS ID # W461
 - c. RPS ID # 60324A – Salton Sea Power Generation Co #4; 6922 Crummer Road, Calipatria, CA 92233; WREGIS ID # W462
2. The amount of additional time being requested for the applicant to submit a complete application for RPS certification or an amended application for RPS certification, as applicable, unless the request for an extension of time includes a completed application for certification or amended certification.

SCE is not requesting additional time to submit an application. SCE is requesting that the RPS eligibility dates for all three Salton Sea facilities be reinstated to April 5, 2005 without any ineligibility period through the present, as indicated on the initial certifications attached.

3. An explanation of the circumstances why the applicant is or was unable to submit a timely application for certification and/or supporting documentation by the deadline specified in the RPS Guidebook, and whether these circumstances were beyond the applicant's control.

As discussed above, SCE successfully submitted and received approval of the RPS certifications for all three Salton Sea facilities under the criteria established in the Third Edition of the RPS Eligibility Guidebook effective as of April 5, 2005. The RPS certifications for the Salton Sea facilities were disapproved as of October 2008 because the Energy Commission mistakenly classified the facilities' PPAs as terminated. This termination was in error. The Salton Sea facilities' PPAs were not terminated. The Salton Sea facilities are still delivering pursuant to the same PPAs with SCE as they were when the facilities were utility-certified effective April 5, 2005.

To rectify this issue, SCE resubmitted RPS certification applications for each of the three Salton Sea facilities in 2012 as instructed by Energy Commission Staff. The RPS certifications for the facilities were reinstated; however, the RPS eligibility date was changed to May 7, 2012 – the application processing date of the resubmitted applications – rather than reinstated to the April 5, 2005 eligibility date.

SCE recently became aware of this problem during the verification process for 2011-2013 generation when Energy Commission Staff preliminary determined that SCE's generation from the Salton Sea facilities from 2011 through April 2012 (which amounts to approximately 1,000,000 MWh) is ineligible because of the facilities' May 7, 2012 RPS eligibility date.

4. An explanation of the financial consequences or other consequences to the applicant and/or facility owner or operator if an extension of time is not granted.

If the April 5, 2005 RPS eligibility date is not reinstated, SCE will lose RPS credit for 1,061,434 MWh for the January 2011 through April 2012 time period. SCE's customers paid a total of \$98,096,092.47 for that period under the Salton Sea facilities' PPAs. Additionally, for the period of October 2008 through December 2010, SCE claimed 1,907,935 MWh, which was a paid total of \$177,206,379.81.

5. An explanation of any other good cause that exists for granting the request for an extension of time.

See above.

6. Documentation, if available, to support the information provided in items (1) through (5).

- a. Email1 - CEC Certification - Salton Sea Power Generation.pdf
- b. Email2 - CEC Certification - Salton Sea Power Generation.pdf
- c. Email3 - Salton Sea Power Generation - RPS Verification Email between CEC and SCE.pdf
- d. 3039 - 60323E.pdf
- e. 3025 - 60317E.pdf
- f. 3050 - 60324E.pdf
- g. 60317E - Power Purchase Contract.pdf
- h. 60323E - Power Purchase Contract.pdf
- i. 60324E - Power Purchase Contract.pdf

Please contact me with any questions you may have about this request. SCE looks forward to your response and to resolving this issue.

Sincerely,



Eric Lopez
Manager
Contract Compliance & Technical Services
Energy Procurement & Management
Southern California Edison

Additional Documentation for SCE Salton's Sea Letter

Christina Ly

From: Crume, Christina@Energy <Christina.Crume@energy.ca.gov>
Sent: Thursday, January 14, 2016 10:37 AM
To: Simon Chang
Cc: Christina Ly
Subject: RE: (External):RPS Verification Beginning On Date Check - SCE

Hi Simon,

Unfortunately I do not have the original contract in place at the time of certification because it was not required or submitted. The information in the file referenced the original contract ending in September 2008, which is why the facility was disapproved. For utility certifications, the facility is eligible under the original contract that was in place during the certification under the First RPS Eligibility Guidebook in 2004. If the contract has been voluntarily renegotiated, extended, modified, cancelled, or terminated, then the eligibility of the facility would also end.

The certifications that were issued in 2012 specified that the eligibility date was 2012, so I am unsure of why there was an assumption the eligibility date was different.

If you would like to fill out a time extension waiver request for an earlier eligibility date, please follow the requirements in the RPS Eligibility Guidebook.

Best,
Christina

From: Simon Chang [mailto:Simon.Chang@sce.com]
Sent: Thursday, December 31, 2015 1:48 PM
To: Crume, Christina@Energy
Cc: Christina Ly
Subject: RE: (External):RPS Verification Beginning On Date Check - SCE

Hi Christina,

Thanks for the information and suggestion. I am somewhat familiar with the time extension waiver. However, I still don't understand why the records would indicate those contracts ended in 2008. Was there something submitted by SCE which indicated the contracts ended in 2008? I think we had this same question back in 2012, but ended up just submitting applications as suggested by Mark Kootstra, without questioning further. Now that this has come up again, I feel we should get some clarity on how the CEC records show such contract end date. I just want to make sure there was no mistake in marking the certifications as disapproved in the first place. Thank you.

Simon Chang | simon.chang@sce.com | 626-302-9070
Energy Contracts | Southern California Edison
2244 Walnut Grove Avenue | Rosemead, CA 91770

From: Crume, Christina@Energy [mailto:Christina.Crume@energy.ca.gov]
Sent: Wednesday, December 30, 2015 3:00 PM
To: Simon Chang <Simon.Chang@sce.com>
Cc: Christina Ly <Christina.Ly@sce.com>
Subject: RE: (External):RPS Verification Beginning On Date Check - SCE

Hi Simon,

Our records indicated that the original contract that was in place at the time of certification in 2004 ended in 2008 which is why the facilities were marked as disapproved in September 2008.

If you would like to request a time extension waiver, you may do so by following the guidelines in the RPS Eligibility Guidebook, 8th Edition, specifically on pages 74-76.

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

Best,

Christina Crume

RPS Certification
Renewable Energy Division
California Energy Commission
1516 9th Street MS – 45
Sacramento, CA 95814
916-654-4674
christina.crume@energy.ca.gov

From: Simon Chang [<mailto:Simon.Chang@sce.com>]
Sent: Monday, December 28, 2015 10:49 AM
To: Crume, Christina@Energy
Cc: Christina Ly
Subject: RE: (External):RPS Verification Beginning On Date Check - SCE

Hi Christina,

Sorry I haven't followed up on this in a couple of months. I was reminded of this issue when Theresa Daniels brought it to my attention recently with the RPS claims verification report.

For 60317, 60323, 60324 the original PPAs are still active. They are all 30 year contracts, and the earliest one to expire is in 2017. I recall this same question came up in 2012 when we were working with Mark Kootstra on this. There were some communication back and forth, and I don't think there were ever any records indicating the contracts had ended. Eventually, Mark just asked us to submit the application so he has them on record and can properly close this out. We did as such, but were not expecting the eligibility date to be reset.

Unfortunately I don't have much of email archives during that period due to a hard drive crash. This is mainly based on my memory, so the details are sketchy. I'm asking my colleague Sergio Islas (he's out on vacation until next Monday) to see if he still has old email communication regarding this subject. If you have any old documents that can clarify this, please let us know.

As for 61993, we are following up with our counterparty to resolve the issue.

Simon Chang | simon.chang@sce.com | 626-302-9070
Energy Contracts | Southern California Edison
2244 Walnut Grove Avenue | Rosemead, CA 91770

From: Crume, Christina@Energy [<mailto:Christina.Crume@energy.ca.gov>]
Sent: Monday, October 05, 2015 6:59 AM
To: Simon Chang <Simon.Chang@sce.com>; Daniels, Theresa@Energy <Theresa.Daniels@energy.ca.gov>
Cc: Gould, Angela@Energy <Angela.Gould@energy.ca.gov>; Chisholm, Emily@Energy <Emily.Chisholm@energy.ca.gov>

McCollough, Brian@Energy <Brian.McCollough@energy.ca.gov>
Subject: RE: (External):RPS Verification Beginning On Date Check - SCE

Hi Simon,

It appears that for 60317, 60323, and 60324 the original PPAs ended in September 2008 and the facilities were not applied for until May 2012. Therefore there is a gap in the certification from October 2008 thru April 2012.

For 61993, the facility did not apply for certification until January 2013, which is the eligibility date. Any generation before January 2013 is not eligible.

Let me know if you have additional questions.

Christina Crume
RPS Certification
Renewable Energy Division
California Energy Commission
1516 9th Street MS – 45
Sacramento, CA 95814
916-654-4674
christina.crume@energy.ca.gov

From: Simon Chang [<mailto:Simon.Chang@sce.com>]
Sent: Friday, October 02, 2015 5:52 PM
To: Daniels, Theresa@Energy
Cc: Gould, Angela@Energy; Chisholm, Emily@Energy; McCollough, Brian@Energy; Crume, Christina@Energy
Subject: RE: (External):RPS Verification Beginning On Date Check - SCE

Thanks for the notification, Theresa. I do recall having to submit applications for 60317, 60323, 60324 a couple of years back due to some issues. I thought the issues were resolved, but perhaps not. I will check my records and work with Christina Crume. I was not aware of any issues with 61993. I will check with our counterparty for that facility.

Simon Chang | simon.chang@sce.com | 626-302-9070
Energy Contracts | Southern California Edison
2244 Walnut Grove Avenue | Rosemead, CA 91770

From: Daniels, Theresa@Energy [<mailto:Theresa.Daniels@energy.ca.gov>]
Sent: Thursday, September 24, 2015 12:30 PM
To: Simon Chang <Simon.Chang@sce.com>
Cc: Gould, Angela@Energy <Angela.Gould@energy.ca.gov>; Chisholm, Emily@Energy <Emily.Chisholm@energy.ca.gov>;
McCollough, Brian@Energy <Brian.McCollough@energy.ca.gov>; Crume, Christina@Energy
<Christina.Crume@energy.ca.gov>
Subject: (External):RPS Verification Beginning On Date Check - SCE

This is an EXTERNAL email. If the sender is not recognized, do not open attachments or click on any Internet links within the message.

Hi Simon,

We are working on verifying SCE's 2011-2013 RPS claims, and in our verification analysis we found that SCE retired RECs from 4 facilities (RPS IDs 60317, 60323, 60324, and 61993) which were generated before the facilities' RPS certification beginning on dates. RECs with a vintage prior to a facility's "Beginning On Date" are not eligible to be claimed for the RPS. The RPS claims with this issue are listed in the attached spreadsheet along with each claim's vintage year/month date and the facilities' Beginning On dates. These claims have been marked as ineligible for the RPS in our verification analysis.

However, there is a process in our Guidebook for "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>

If the RPS certified facilities listed in the attached spreadsheet are able to successfully request a time extension, we will be able to reassess whether the RECs in question are eligible. I recommend researching why the facilities' application weren't received until the Beginning On Dates listed in the attached spreadsheet, and the consequences of the request not being granted.

Please let me know if you have any questions! The actual waiver request will be processed by Christina Crume, so I recommend contacting her if you have any questions on that process.

Thank you,
Theresa

Theresa Daniels
Energy Specialist 1
Renewables Portfolio Standard Unit
California Energy Commission
(916) 654-4669
Theresa.daniels@energy.ca.gov

{In Archive} Re: Salton Sea Projects Certification Status 

Simon Chang to: Mark Kootstra

04/04/2012 06:07 PM

On: Sergio Islas

Archive: This message is being viewed in an archive.



FOR INTERNAL USE ONLY

Hi Mark,

I am not sure if you had a chance to listen to the voicemail message from either me or Sergio. Basically we stated that none of the four facilities are terminated. They are all active under the original contracts. We would like to discuss this a little more before re-submitting the applications.

In the meantime, I'm attaching the spreadsheet for utility certification that was done in 2005. It's a large file, so it may slow down your system. Also attached are the four CEC certificates issued to us for the four facilities.

I will try to call you again on Friday. Please let me know if you have any questions. Thank you.



2004-05-25_CEC-RPS-2 v2.xls SaltonSea-CEC-RPS-Certificates.pdf

-Simon Chang
Renewable & Alternative Power
626-302-9070

Mark Kootstra

Hi Simon, Per the phone message I left you I am...

03/30/2012 02:23:00 PM

From: Mark Kootstra <MKootstr@energy.ca.gov>
To: <Simon.Chang@sce.com>
Date: 03/30/2012 02:23 PM
Subject: Re: Salton Sea Projects Certification Status

Hi Simon,

Per the phone message I left you I am requesting that SCE, or the facility owner, submit an RPS application for each of these facilities for the Energy Commission to process. Along with the application please provide information on the termination date of the original contract SCE had with each facility that was used to apply for certification on the CEC-RPS-2 form at the beginning of the RPS program.

Once we get this information will process the applications as quickly as we can so the certification can be included in the verification report. If it turns out the contract termination date was the reason the certification was revoked in 2008 we should be able to reverse the disapproval after the adoption of the fifth edition of the RPS guidebook.

If at all possible please submit this information by Friday of next week so the information can be incorporated into the verification process.

If you have any questions please feel free to contact me. I start classes again on Monday so I will only be able to talk Monday and Wednesday mornings before 11 am, or anytime on Friday, but feel free to email me if you have questions at other times.

Sincerely,

Mark Kootstra
Renewables Portfolio Standard Program
California Energy Commission
1516 9th Street, MS-45
Sacramento, CA 95814
phone: (916) 653-4487
mkootstr@energy.ca.gov

>>> <Simon.Chang@sce.com> 2/17/2012 1:19 PM >>>

Hi Mark,

I haven't had a chance to search through documents for these projects yet. It will likely be next week before I can provide the documents and talk to you. Thank you.

-Simon Chang
Renewable & Alternative Power
626-302-9070

From: Mark Kootstra <mkootstr@energy.ca.gov>
To: <Simon.Chang@sce.com>
Date: 02/16/2012 03:17 PM
Subject: Re: Salton Sea Projects Certification Status

Hi Simon,

Sorry to take so long to reply to you.

As I believed we discussed I am having difficulty generating an accurate timeline for these facilities. Until I am able to get some general timeline we are hesitant to identify the best way to proceed with the facilities. To help expedite this process please provide, if available, a copy of:

The original CEC-RPS-2 application
Any official correspondence from the Energy Commission concerning this facility.
A list of project/contractual milestones, including contract start and termination dates or dates of revisions

I will be in the office tomorrow and we can talk more about the process then, but the more information you are able to provide the easier our decision process will be, and the faster I can move it along.

Sincerely,

>>> <Simon.Chang@sce.com> 01/12/12 1:31 PM >>>
Hi Mark,

I am following up on the Disapproved status for the following three facilities.

60317E - Salton Sea Power Generation L.P. #3
60323E - Salton Sea Power Generation L.P. #1
60324E - Salton Sea IV

Please let me know how we can change the status to Approved. Last we spoke, there was no record indicating how/why the facilities were disapproved. Thank you.

-Simon Chang
Renewable & Alternative Power
626-302-9070

{In Archive} MWD Diamond Valley Lake & Salton Sea Projects

Simon Chang
to:
Mark Kootstra
09/13/2011 05:59 PM

Cc:
Barry Gilman, Mike Marelli

From:
Simon Chang/SCE/EIX

To:
Mark Kootstra <MKootstr@energy.state.ca.us>

Cc:
Barry Gilman/SCE/EIX@SCE, Mike Marelli/SCE/EIX@SCE

Archive:
This message is being viewed in an archive.

FOR INTERNAL USE ONLY

Hi Mark,

To summarize our phone conversation today regarding the two items brought up last week:

- 1) W1287 Metropolitan Water District Diamond Valley Lake
 - transfer of WREGIS registration from MWD to SCE resulted in CEC RPS ID (60901A) being wiped out
 - upon initial look, no standing problem that will prevent you from validating the the certification and repopulating the ID field in WREGIS
 - you will notify us if any problem comes up during the process
- 2) Salton Sea 1, 3, 4 (CEC RPS IDs 60323E, 60317E, 60324E respectively)
 - certification status Disapproved for the 3 facilities, going back as far as 2008
 - no recent record as to how or why they were disapproved, you will look into older records
 - can change certification status if no records found for disapproval, may need to re-submit application for record keeping

Aside from the above, going forward, I will provide a monthly list of CEC fully certified facilities which are missing the CEC RPS ID in WREGIS. In

addition, we will continue to notify CEC whenever we find facilities with duplicate certifications, as we have done for the Coram facilities in the 2008 Compliance Report. Thank you for helping us with the issues.

-Simon Chang
Renewable & Alternative Power
626-302-9070

{In Archive} CEC Certification - Salton Sea Power Generation Co #1, #3, #4

Simon Chang for RPSTrack

05/03/2012 06:17 PM

cc: Mark Kootstra, Barry Gilman, Sergio Islas

Archiver: This message is being viewed in an archive.



FOR INTERNAL USE ONLY

As requested by Mark Kootstra, SCE is re-submitting the RPS Certification application for each of the three Salton Sea projects. Please accept the attached three CEC-RPS-1A forms in Excel format. The original signed application forms will be in the mail tomorrow. Also attached are scanned images of the original issued RPS Certificates.



SaltonSea1-CEC-RPS-1A.xlsx



SaltonSea3-CEC-RPS-1A.xlsx



SaltonSea4-CEC-RPS-1A.xlsx



SaltonSea-CEC-RPS-Certificates.pdf

Thank You

-Simon Chang
Renewable & Alternative Power
626-302-9070

Certified Eligible for California's Renewables Portfolio Standard

This is to certify that

Salton Sea Power Generation L.P. #3

Beginning on: April 5, 2005

Located in: Calipatria, CA

Owned/Operated by: Southern California Edison

Fuel Type: Geothermal

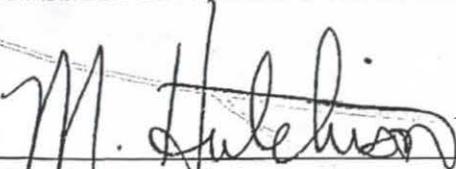
Size: 49.80 MW

Annual Fossil Fuel Usage: 0 %

*Has been certified by the California Energy Commission as eligible for California's Renewables Portfolio Standard under the criteria established in the **Renewables Portfolio Standard Eligibility Guidebook, 3rd Edition**, publication number CEC-300-2007-006-ED3-CMF, January 2008, and assigned CEC-RPS-ID number:*

60317E

THIS FACILITY HAS BEEN CERTIFIED BY SOUTHERN CALIFORNIA EDISON.
CERTIFICATION IS LIMITED TO THE GENERATION PROCURED UNDER THE CONTRACT
BETWEEN SALTON SEA POWER GENERATION L.P. #3 AND SOUTHERN CALIFORNIA EDISON.



Mark Hutchison

September 30, 2008
Date Issued

Certified Eligible for California's Renewables Portfolio Standard

This is to certify that

Salton Sea Power Generation L.P. #1

Beginning on: April 5, 2005

Located in: Calipatria, CA

Owned/Operated by: Southern California Edison

Fuel Type: Geothermal

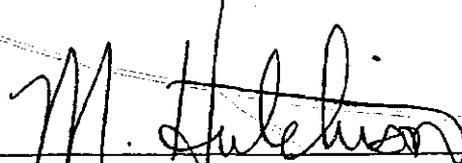
Size: 10.00 MW

Annual Fossil Fuel Usage: 0 %

*Has been certified by the California Energy Commission as eligible for California's Renewables Portfolio Standard under the criteria established in the **Renewables Portfolio Standard Eligibility Guidebook, 3rd Edition**, publication number CEC-300-2007-006-ED3-CMF, January 2008, and assigned CEC-RPS-ID number:*

60323E

THIS FACILITY HAS BEEN CERTIFIED BY SOUTHERN CALIFORNIA EDISON.
CERTIFICATION IS LIMITED TO THE GENERATION PROCURED UNDER THE CONTRACT
BETWEEN SALTON SEA POWER GENERATION L.P. #1 AND SOUTHERN CALIFORNIA EDISON.



Mark Hutchison

September 30, 2008
Date Issued

Certified Eligible for California's Renewables Portfolio Standard

This is to certify that
Salton Sea IV

Beginning on: April 5, 2005

Located in: Calipatria, CA

Owned/Operated by: Southern California Edison

Fuel Type: Geothermal

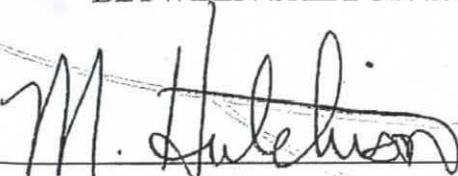
Size: 36.00 MW

Annual Fossil Fuel Usage: 0 %

*Has been certified by the California Energy Commission as eligible for California's Renewables Portfolio Standard under the criteria established in the **Renewables Portfolio Standard Eligibility Guidebook, 3rd Edition**, publication number CEC-300-2007-006-ED3-CMF, January 2008, and assigned CEC-RPS-ID number:*

60324E

THIS FACILITY HAS BEEN CERTIFIED BY SOUTHERN CALIFORNIA EDISON.
CERTIFICATION IS LIMITED TO THE GENERATION PROCURED UNDER THE CONTRACT
BETWEEN SALTON SEA IV AND SOUTHERN CALIFORNIA EDISON.


Mark Hutchison

September 30, 2008
Date Issued

UNION OIL

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CLD NO. 386939

POWER PURCHASE CONTRACT
BETWEEN
SOUTHERN CALIFORNIA EDISON COMPANY
AND
UNION OIL COMPANY
SALTON SEA III

EXECUTION COPY

Please refer to this
Contract/Project as:
Union Oil Company
Salton Sea III

QF ID NO. 3025

UNION OIL

1.5 Expected Firm Operation for each generating unit(s): January 1, 1989.

1.6 Contract Term: 30 years.

1.7 Operating Option pursuant to Section 5: Operating Option I. Entire Generator net output committed to Edison. No electric service or standby service required.

1.8 The Capacity Payment Option selected by Seller pursuant to Section 9.1 shall be: Option B - Firm Capacity, based on Standard Offer No. 2 Capacity Payment Schedule in effect at time of Contract execution.

Contract Capacity Price: \$175/kW-yr. based on Firm Operation in 1989.

1.9 The Energy Payment Option selected by Seller pursuant to Section 9.2 shall be: (Check One)

Option 1 - Forecast of Annual Marginal Cost of Energy in effect at date of execution of this Contract. (Appendix B)

Option 2 - Levelized Forecast of Marginal Cost of Energy in effect at date of execution of this Contract. Levelized Forecast for expected date of Firm Operation is 9.8¢/kWh.

For the energy payment refund pursuant to Section 9.5 under Option 2, Edison's incremental cost of capital is 15 %.

UNION OIL

23. MULTIPLE ORIGINALS

This Contract is executed in two counterparts, each of which shall be deemed an original.

SIGNATURES

IN WITNESS WHEREOF, the Parties hereto have executed this Contract this 16th of April, 1985.

APPROVED AS TO FORM:
JOHN R. BURY
Vice President and General Counsel
By Conrad H. Rovito
April 16, 1985 Attorney

SOUTHERN CALIFORNIA EDISON COMPANY

By [Signature]
EDWARD A. MYERS, JR.
Vice President

UNION OIL COMPANY OF CALIFORNIA,
UNION GEOTHERMAL DIVISION

By [Signature]
CAREL OTTE
President
Union Geothermal Division
and Its Attorney In Fact

20 //
21 //
22 //
23 //
24 //
25 //
26 //

CONFORMED COPY

EARTH ENERGY

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CONTRACT
FOR THE PURCHASE AND SALE OF ELECTRIC POWER FROM
THE SALTON SEA GEOTHERMAL GENERATING FACILITY
BETWEEN
SOUTHERN CALIFORNIA EDISON COMPANY
AND
EARTH ENERGY, INC.

CLD NO. 403804

QF ID NO. 3039

Document No. 5007C

EARTH ENERGY

1 metering shall be different and separate for
2 Phases I and II as set forth in this Contract.

3 1.5 Expected Date of Firm Operation:

4 Phase I - July 1, 1987 - 10,000 kW

5 Phase II - July 1, 1995 - All incremental
6 additions up to
7 20,000 kW under
8 Phase II

9 1.6 Contract Term: 30 years commencing on July 1,
10 1987, applicable to Phase I and Phase II.

11 1.7 Pursuant to Section 5, entire Generator net output
12 committed to Edison. No electric service or
13 standby service required.

14 1.8 The Contract Performance Payment Price shall be
15 \$105/kW-yr as of the Fourth Quarter of 1986
16 subject to quarterly adjustments thereafter
17 pursuant to Section 9.1 and Firm Operation in 1987.

18 1.9 The Monthly Energy Payment shall be calculated
19 using a Base Price subject to quarterly
20 adjustments pursuant to Section 9.2.

21 //

22 //

23 //

24 //

25 //

26 //

EARTH ENERGY

1 22. MULTIPLE ORIGINALS

2 This Contract is executed in two counterparts, each of
3 which shall be deemed an original.

4 SIGNATURES

5 IN WITNESS WHEREOF, the Parties hereto have executed this
6 Contract this 8th of May,
7 1987.

8 SOUTHERN CALIFORNIA EDISON COMPANY

9 BY *Glenn J. Bjorklund*
10 GLENN J. BJORKLUND
11 Vice President

12 EARTH ENERGY, INC.

13 BY *Paul Otte*
14 CAREL OTTE
15 President

14 //
15 //
16 //
17 //
18 //
19 //
20 //
21 //
22 //
23 //
24 //
25 //
26 //

APPROVED AS TO FORM:
JOHN R. BURY
Vice President and General Counsel
BY *John R. Bury*
Attorney
May 7, 1987

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CONSOLIDATED, AMENDED, AND RESTATED

POWER PURCHASE AGREEMENT

AMONG

SOUTHERN CALIFORNIA EDISON COMPANY,

FISH LAKE POWER COMPANY,

AND

SALTON SEA POWER GENERATION L.P.

QFID (3050)

EFFECTIVE May 27, 1995

(DATE)

POWER PURCHASE AGREEMENT
FISH LAKE POWER COMPANY AND SALTON SEA POWER GENERATION, L.P.
QFID 3050

1 2.4 Location of Edison Operating Switching Center:

2 Energy Control Center
3 501 So. Marengo Avenue
4 Alhambra, CA 91802

5 2.5 Contract Capacity: 34,000 kW

6 2.5.1 Estimated as-available capacity:
7 2,000 kW

8 2.6 Expected annual production: 252,288,000 kWh.

9 2.7 Expected Date of Firm Operation: The date
10 specified in the Quarterly Status Reports submitted
11 to Edison pursuant to Section 6.2(a), as amended
12 from time to time pursuant to Section 6.2(a).

13 2.8 Contract Term: The Contract Term shall be for
14 thirty (30) years, commencing with the date of Firm
15 Operation, provided that the date of Firm Operation
16 occurs prior to the Sunset Date.

17 2.9 Operating Option: Seller dedicates the entire
18 Generator output, net of Station Use, to Edison,
19 with no electric service or standby service
20 required from Edison.

21 2.10 Capacity Payments: The firm and as-available
22 capacity payments shall be paid pursuant to
23 Section 10.1 and shall be based on the following:

- 24 a. The "Salton Sea Price" shall be
25 \$121.72/kW-yr, adjusted quarterly per
26 Section 10.1.7. The Unit Reference
 Quarter shall be the second (2nd) quarter
 of 1992.

POWER PURCHASE AGREEMENT
FISH LAKE POWER COMPANY AND SALTON SEA POWER GENERATION, L.P.
QFID 3050

1 29. EFFECTIVE DATE: This PPA shall become effective upon the
2 occurrence of each and every condition set forth in
3 Section 25 hereof. Edison shall give prompt written notice
4 to Seller upon effectiveness of this PPA.

5 FISH LAKE POWER COMPANY

6
7 By: *RW Boeker*
8 Name: RALPH W. BOEKER
9 Title: PRESIDENT
10 Date: NOVEMBER 22, 1994

11 SALTON SEA POWER GENERATION, L.P.

12 BY: SALTON SEA POWER COMPANY,
13 General Partner

14 By: *RW Boeker*
15 Name: RALPH W. BOEKER
16 Title: DIRECTOR & VICE CHAIRMAN OF
17 Date: NOVEMBER 22, 1994 THE BOARD

18 SOUTHERN CALIFORNIA EDISON COMPANY

19 By: *V. Vikram Budhraja*
20 Name: Vikram S. Budhraja
21 Title: Vice President
22 Date: November 29, 1994

23 //
24 //
25 //
26 //

