

DOCKETED

Docket Number:	16-RPS-02
Project Title:	Appeal by Los Angeles Department of Water & Power re Renewables Portfolio Standard Certification Eligibility
TN #:	213750
Document Title:	Declaration of Robert Campbell in 16-RPS-02 (09.20.16)
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STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION

In the Matter of:)	Docket No. 16-RPS-02
)	
Appeal by LADWP re)	RE: Declaration of Robert Campbell
RPS Certification or Eligibility)	in 16-RPS-02
)	
)	

DECLARATION OF ROBERT CAMPBELL

I, Robert Campbell, declare as follows:

1) I am a Managing Director at Powerex Corp.¹ (“Powerex”), headquartered in the City of Vancouver, Province of British Columbia, Canada. I have worked at Powerex since November 2006.

2) As a Managing Director at Powerex, I am responsible for environmental products, including renewable electricity.

3) I am authorized to make this declaration for and on behalf of Powerex and the following matters are true and correct to the best of my knowledge and belief as of the date hereof.

Powerex-LADWP Power Purchase Agreement Nos. BP-020-A and BP-020-B

4) Powerex and the Los Angeles Department of Water and Power (“LADWP”) entered into two contracts for the purchase of renewable energy: Power Purchase Agreement No. BP 05-020-A (16-RPS-02 Docket TN# 212419) referred to herein as “Contract A” and Power Purchase Agreement No. BP-020-B (16-RPS-02 Docket TN# 212420) referred to herein as “Contract B.” TN# 212419 and TN# 212420 are referenced as Exhibit 18 (Bates Nos. LA000118-LA000195)

¹ Powerex Corp., doing business in California as Powerex Energy Corp.

and Exhibit 19 (LA Bates nos. LA000196-LA000273) respectively in the Declaration of Louis C. Ting in 16-RPS-02 (TN# 212401).

5) TN# 213387 referenced as Exhibit 328 (Bates Nos. LA001570-LA001573) in the Supplemental Declaration of Louis C. Ting in 16-RPS-02 (TN# 213035) is a true and correct copy of the Designation Letters addressed to LADWP dated November 29, 2010 for Contract A and Contract B (“2010 Designation Letters”).

6) Exhibit 395 (Bates Nos. LA002910-LA002913) is a true and correct copy of the Designation Letters addressed to LADWP dated December 7, 2009 for Contract A and Contract B (together with the 2010 Designation Letters, the “Powerex Designation Letters”).

7) Schedule 1 of the Powerex Designation Letters contained in Exhibit 328 (TN# 213387) and Exhibit 395 identified the designated generating facilities under Contract A and Contract B for the period covering January 1, 2011 to December 31, 2011.

8) TN# 213374 through and including TN# 213385 (Bates Nos. LA001532-LA001567) referenced as Exhibit 315 through and including Exhibit 326 in the Declaration of Sharat Batra in 16-RPS-02 (TN# 213346) are true and correct copies of the monthly attestations delivered to LADWP by Powerex with respect to Contract A and Contract B for the period of January 1, 2011 to December 31, 2011 (the “Powerex Attestations”). Each of the Powerex Attestations state that the Renewable Energy Credits associated with the Renewable Energy sold to LADWP during the applicable monthly period from January 1, 2011 to December 31, 2011 were generated from a blend of 100 percent small hydroelectric generation with a nameplate capacity of 30 MWs or less.

9) Exhibit 396 (Bates No. LA002914) is a true and correct copy of a map generated and made publicly available by British Columbia Hydro and Power Authority reflecting the location

of certain independent power producer generation facilities in the Province of British Columbia as at April 1, 2016 (“IPP Map”). The IPP Map includes the location of the named designated facilities set forth in Schedule 1 of the Powerex Designation Letters (as referenced in paragraph 7 above), which locations have not, to the best of my knowledge, materially changed since 2011. It should be noted that (i) the IPP Map clusters together four small hydroelectric generating facilities (Fire Creek Power Plant, Douglas Creek Power Plant, Stokke Creek Power Plant, and Tipella Creek Power Plant) under the name Kwalsa Energy (item 61 in the IPP Map) and (ii) Purcell Power Project is now known as Skookumchuck Power Plant (item 20 in the IPP Map).

I declare that the foregoing is true and correct to the best of my knowledge and that this declaration was executed on September 20, 2016, at the City of Vancouver, Province of British Columbia, Canada.

/s/Robert Campbell

Robert Campbell
Managing Director
Powerex Corp.