

LightBeam Power Company Gridley Main LLC
LightBeam Power Company Gridley Main Two LLC
c/o Trina Solar (US) Development LLC
100 Century Center Court, Suite 501
San Jose, CA 95112

California Energy Commission
DOCKETED
11-RPS-01
TN # 74243
JAN 05 2015

June 25, 2014

California Energy Commission
Office of the Executive Director
1516 9th Street, MS-39
Sacramento, CA 95914-5512
Attn: Executive Director

Re: LightBeam Power Company Gridley Main LLC (CEC-RPS-ID Number 62042C)
LightBeam Power Company Gridley Main Two LLC (CEC-RPS-ID Number 62043C)

Dear Executive Director:

For the reasons stated below, we are requesting that the CEC modify the date on which LightBeam Power Company Gridley Main LLC ("GM1") and LightBeam Power Company Gridley Main Two LLC ("GM2") were certified as eligible renewable energy resources ("ERR") to an earlier date that is within 90 days of the commercial operation dates ("COD") of GM1 and GM2. This would enable the renewable energy certificates ("RECs") associated with GM1 and GM2 to be certified as RPS compliant RECs within 90 days of these plants achieving COD, versus April 3, 2014 which is the current date these plants were certified RPS compliant.

The background on GM1 and GM2 is as follows:

GM1 is a 1 MW solar energy production facility, located in Gridley, CA which has signed and operates under a 25 year Power Purchase Agreement with the Northern California Power Agency ("NCPA"). GM1 was granted a pre-certification on August 14, 2012 and achieved commercial operation on March 1, 2013.

GM2 is a 2.5 MW solar energy production facility, located in Gridley, CA which has signed and operates under a 25 year Power Purchase Agreement with the NCPA. GM2 was granted a pre-certification on August 14, 2012 and achieved commercial operation on April 1, 2013.

The following is a summary of events regarding the filing of the final applications for RPS certification:

- (1) During the period following the granting of the pre-certification for GM1 and GM2, four employees that were involved in the full certification filing process resigned from their positions within a few months of each other (which accounted for approximately 50% of the project team working on GM1 and GM2).

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- (2) Due to these resignations, management had to spend time to reallocate the responsibilities of the former employees to the remaining project team members. It was not until after such reallocation of responsibilities to the remaining project development employees that management discovered that final certification applications had not been filed.
- (3) Subsequent to management's discovery that these final certifications had not been made, GM1 and GM2 project team members took immediate action to resolve this issue as quickly as possible including submitting a series of applications for final certification as detailed below:
 - a. Electronic and handwritten hard copies of the application were sent to the CEC on December 26, 2013 (and subsequently rejected by the CEC as to the handwritten form of these applications on January 6, 2014);
 - b. Electronic and typed hard copies of the application were sent to the CEC on December 30, 2013 (the electronic copy was received by CEC but the hard copy was apparently lost in the mail over the holiday season as the CEC said they did not receive it); and
 - c. An additional typed hard copy application was sent to the CEC on March 12, 2014 (receipt of such copy was confirmed by the CEC).

CEC has advised us that final RPS certifications for GM1 and GM2 were issued on April 3, 2014 based on the application resubmitted to the CEC on March 12, 2014 which was a duplicate of the original typed hard copy submitted previously to the CEC on December 30, 2013.

As a result of the delays in receiving final RPS certifications for GM1 and GM2 until April 3, 2014, GM1 and GM2 have produced non-RPS compliant RECs during the period between each project's respective COD date and respective certification date of April 3, 2014. As such, we request that the CEC retroactively apply RPS certifications to these RECs to make them RPS compliant from a date that is within 90 days of the COD of GM1 and GM2 respectively.

Pursuant to the terms of the GM1 and GM2 Power Purchase Agreements with NCPA ("PPAs"), GM1 and GM2 are required to obtain a final RPS certification within 90 days of the projects achieving COD and to deliver such RPS compliant RECs to NCPA within 90 days of the COD dates of GM1 and GM2.

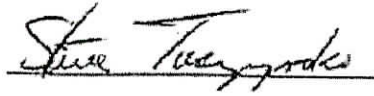
As a result of the final RPS certifications for GM1 and GM2 being issued on April 3, 2014 versus a date that is within 90 days of each plants COD, GM1 and GM2 face significant financial hardship associated with meeting the RECs certification requirements as set forth in the PPAs. Additionally, failure to meet such RECs certifications as required in the PPAs may put the PPAs at risk for both GM1 and GM2.

In summary, we ask that you consider our request to change the RPS certification dates of GM1 and GM2 to a date that is within 90 days of the COD of these projects based on our good faith efforts to obtain final RPS certifications, the pending significant financial hardship for GM1 and GM2 as well as the risk to the PPAs resulting from the current RPS certification dates of April 3, 2014 for these plants.

Please feel free to contact Mike Nelson, Senior Counsel, at mike.neslon@trinasolar.com or at 408.459.6691 with any questions.

Thank you for your consideration.

Very truly yours,

A handwritten signature in cursive script that reads "Steve Tuszynski". The signature is written in black ink and is positioned above a horizontal line.

Steve Tuszynski, Secretary
LightBeam Power Company Gridley Main LLC
LightBeam Power Company Gridley Main Two LLC