



SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY  
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IMPERIAL IRRIGATION DISTRICT

January 15, 2015

California Energy Commission

**DOCKETED**

**1) -9PS-01**

**TN # 74211**

**JAN 11 2015**

California Energy Commission  
EPS Compliance  
1516 Ninth Street  
Sacramento, CA 95814-512  
Attention: Compliance Filing

Re: EPS Compliance Filing for Heber-1 Geothermal Energy Project

Dear Sir or Madam:

Please be advised that on May 16, 2013, the Board of Directors of the Southern California Public Power Authority ("SCPPA"), at a noticed public meeting, approved and authorized execution and delivery of a Power Purchase Agreement ("PPA") between SCPPA and ORNI 37 LLC ("Seller") for energy, capacity and associated environmental attributes from the Heber-1 geothermal energy generation facility located in Imperial County, California ("Project").

SCPPA is a joint powers agency formed in 1980 pursuant to the Joint Exercise of Powers Act (Cal. Govt. Code § 6500 *et seq.*). SCPPA is comprised of eleven cities and one irrigation district ("Members"), each of which owns and operates an electric utility within its jurisdictional boundaries. SCPPA entered into the PPA on behalf of two Members – the City of Los Angeles and the Imperial Irrigation District ("Participating Members") – each of which will receive its proportionate share of energy and capacity pursuant to individual Power Sales Agreements ("PSA's") with SCPPA.

This compliance filing is made on behalf of the Participating Members as well as for SCPPA's own account pursuant to the Commission's Emission Performance Standard ("EPS") regulations (20 CCR. § 2900 *et seq.*). SCPPA executed the PPA on September 19, 2013, but did not submit a compliance filing within the time prescribed in 20 CCR § 2909 based on a misunderstanding regarding the application of the EPS regulations to the Project given that it is "determined to be compliant with the EPS" under 20 CCR § 2903(b)(1). This filing is thus made belatedly, and SCPPA apologizes to the Commission for any inconvenience.