

Southern Power
600 North 18th Street
Birmingham, Alabama 35203-2206

205-257-6385

California Energy Commission
DOCKETED
11-RPS-01
TN # 76121
AUG 19 2015



July 17, 2015

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



Re: Authorization of the Creation of Retroactive Renewable Energy Credits for the Arkansas Solar Facility (CEC-RPS-ID # 61844A)

Dear Mr. Oglesby:

In compliance with the process prescribed in Section III.A.1.a of the Commission's Renewables Portfolio Standard Eligibility Guidebook, 8th edition, SG2 Imperial Valley, LLC submits this request for authorization of the creation of retroactive renewable energy credits (RECs) for the Arkansas Solar Facility (CEC-RPS-ID # 61844A).

In support of this request, SG2 Imperial Valley, LLC submits the following information, as required by the Guidebook:

<p>a. The name and address of the authorized representative submitting the request and the name, location, and other identifying information of the generation facility or unit for which the creation of retroactive RECs is being requested.</p>	<p>Joseph R. Styslinger Asset & Trading Manager Southern Power Company 600 North 18th Street Birmingham, AL 35203</p> <p>Arkansas Solar Facility 802 East Wilkinson Road Calipatria, CA 92233</p>
<p>b. The generating facility or unit RPS identification number issued by the Energy Commission.</p>	<p>61844A</p>
<p>c. The generating facility or unit WREGIS GU ID.</p>	<p>W4480</p>
<p>d. The vintage month(s) and year(s) of the generating facility or unit generation for which the creation of retroactive RECs is being requested.</p>	<p>March 2014 April 2014 May 2014 June 2014 July 2014 August 2014 September 2014 October 2014 November 2014</p>
<p>e. The reason(s) why retroactive RECs are needed.</p>	<p>A miscommunication occurred during the acquisition process between the project developer, First Solar, and Southern Power Company (SPC), which acquired the membership interest in SG2 Imperial Valley, LLC, the project owner. This error resulted in the failure to register the Arkansas Solar Facility in the WREGIS System within the 75-day period required for WREGIS to create certificates for the eligible renewable energy generated by the facility before the Commercial Operation Date. In January of 2015 SPC took action to register the project in WREGIS. This action was taken within the 75-day period. However, SPC remained unaware until March 9, 2015, that WREGIS still required additional documentation to</p>

	<p>complete the registration request. Upon discovery, SPC promptly provided the required additional documentation and WREGIS approved this generating unit. SPC clearly demonstrated its intent to meet the established deadline. The miscommunication left SPC unaware that the required documentation had not been previously transmitted, which in turn resulted in the failure to meet the WREGIS 75-day deadline.</p>
<p>f. Documentation, if available, to support the information provided in items (a) through (e).</p>	<p>The following documents are attached to this request:</p> <ol style="list-style-type: none"> 1. Timeline describes the circumstances leading up to the request in more detail. 2. WREGIS event log concerning the registration for this project. 3. Email between SPC and WREGIS concerning the need for additional information (attachments omitted).
<p>g. An attestation by the authorized representative of the generating facility or unit declaring</p>	<p>Follows the signature page.</p>

For the reasons stated above, Southern Power Company, on behalf of SG2 Imperial Valley, LLC, respectfully requests the creation of retroactive RFCs for the renewable energy the Arkansas Solar Facility generated from March 2014 until November 30, 2014. SPC and SG2 Imperial Valley, LLC appreciate your consideration of this request. Please let me know if you have any questions about this request or require additional information.

Respectfully submitted,



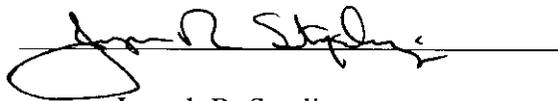
Joseph R. Styslinger
 Asset & Trading Manager
 Southern Power Company

ATTESTATION

I, Joseph R. Styslinger, hereby attest to the following:

1. The RECs associated with generation by the Arkansas Solar Facility for the vintage months and year listed in item "d" in the attached letter have not been sold, traded, or otherwise transferred to any other individual or entity or used to satisfy any state regulatory or voluntary program.
2. I will submit an audit report as specified in the Commission's Renewables Portfolio Standard Eligibility Guidebook, 8th edition, within 90 days after this request is approved.
3. SG2 Imperial Valley, LLC, the owner of the Arkansas Solar Facility, will pay for all costs and expenses incurred by WREGIS staff to create the retroactive RECs, if this request is approved.
4. The information contained in this request and the supporting documentation provided with this request is true, correct, and complete to the best of my knowledge.

Dated: July 16, 2015



Joseph R. Styslinger

ATTACHMENT 1

TIMELINE

Timeline

- **January 28, 2014**
 - Per WREGIS Event Log, First Step of Account Registration process completed. Final step must still be completed by account Administrator.
- **February 24, 2014**
 - Per WREGIS Event Log, SG2 Imperial Valley LLC account approved
- **June 30, 2014**
 - First Solar, per Due Diligence Log, states “WREGIS registration has been completed.”
- **Commercial Operation Date – November 25, 2014**
 - *Below excerpt from WREGIS Operating Rules*

No generation prior to the earliest active certificate cycle at the time the generator is approved will be eligible for Certificate creation. Account Holders with eligible generating units may request permission from the WREGIS Administrator for the creation of WREGIS Certificates for pre-COD (test) energy. The criteria listed below must be met for a unit to be eligible to have pre-COD (test) energy generation data uploaded and subsequent WREGIS Certificates created.

- The unit must be in a WREGIS-approved status
- The unit must have a COD no greater than two years in the past at the time the Pre-COD creation request is submitted to the WREGIS Administrator
- The unit must have been approved in WREGIS within 75 days of the unit's COD
- The entity must submit all documentation needed to verify the claim to the WREGIS Administrator

Generating Units meeting these criteria may make a request through an email request to the WREGIS Administrator.

- **75 Days** of the unit's COD is February 8, 2015



Timeline

- **January 9, 2015**
 - Z-Global informs First Solar that WREGIS account has not been set up for SG2
- **January 28, 2015**
 - SPC registers the 3 generators with WREGIS into account previously activated by First Solar
- **January 29, 2015**
 - SG2 Facilities “inserted and created” in WREGIS (still pending approval by WREGIS)
- **March 9, 2015**
 - SPC inquires about status of generator approval
 - WREGIS informs SPC that they had yet to receive the required documentation
- **March 9 - 10, 2015**
 - SPC submits documentation requested by WREGIS via email
- **March 18, 2015**
 - WREGIS approves Generating Units



ATTACHMENT 2
WREGIS EVENT LOG

My Event Log - All events - Account Holder ID:925

Date	Event Information	Login Name
03/18/2015 12:26:09	<p>WREGIS Generating Unit Approved</p> <p>Congratulations, the WREGIS Administrator has approved your Sonora Solar Facility - Sonora Solar Facility generating unit (WREGIS Unit ID: W4481). You can now begin loading generation data and creating certificates.</p> <p>The following registration elements related to Fuel Sources/Other Eligibility Criteria and the State, Provincial and/or Voluntary Programs were verified by the WREGIS Administrator at the time of your generating units Approval: #Active-Verified Elements#</p> <p>Please note that only those elements that have been set to Active-Verified by the WREGIS Administrator will be tracked for reported generation on created Certificates. Check your generating unit's registration screen to verify which elements have been verified by the WREGIS Administrator.</p> <p>The following Reporting Entity and Reporting Entity Unit ID was selected/entered for generation data reporting purposes: Imperial Irrigation District: 61654C</p> <p>Lastly, the Generation Activity log for this generating unit has been created, and the generating unit has been assigned to the Default - 4803 Active Sub-Account.</p> <p>If you have any questions, please contact the WREGIS Administrator. WREGIS Administrator Tel: 1-888-225-4213 Email: wregishelp@wecc.biz</p>	WREGIS Administrator
03/18/2015 12:26:09	The 'Sonora Solar Facility - Sonora Solar Facility' facility has been modified.	WREGIS Administrator
03/18/2015 12:25:00	<p>WREGIS Generating Unit Approved</p> <p>Congratulations, the WREGIS Administrator has approved your Arkansas Solar Facility - Arkansas Solar Facility generating unit (WREGIS Unit ID: W4480). You can now begin loading generation data and creating certificates.</p> <p>The following registration elements related to Fuel Sources/Other Eligibility Criteria and the State, Provincial and/or Voluntary Programs were verified by the WREGIS Administrator at the time of your generating units Approval: #Active-Verified Elements#</p> <p>Please note that only those elements that have been set to Active-Verified by the WREGIS Administrator will be tracked for reported generation on created Certificates. Check your generating unit's registration screen to verify which elements have been verified by the WREGIS Administrator.</p> <p>The following Reporting Entity and Reporting Entity Unit ID was selected/entered for generation data reporting purposes: Imperial Irrigation District: 61844C</p> <p>Lastly, the Generation Activity log for this generating unit has been created, and the generating unit has been assigned to the Default - 4803 Active Sub-Account.</p> <p>If you have any questions, please contact the WREGIS Administrator. WREGIS Administrator Tel: 1-888-225-4213 Email: wregishelp@wecc.biz</p>	WREGIS Administrator
03/18/2015 12:25:00	The 'Arkansas Solar Facility - Arkansas Solar Facility' facility has been modified.	WREGIS Administrator
03/18/2015 12:23:25	<p>WREGIS Generating Unit Approved</p> <p>Congratulations, the WREGIS Administrator has approved your Alhambra Solar facility - Alhambra Solar Facility generating unit (WREGIS Unit ID: W4479). You can now begin loading generation data and creating certificates.</p> <p>The following registration elements related to Fuel Sources/Other Eligibility Criteria and the State, Provincial and/or Voluntary Programs were verified by the WREGIS Administrator at the time of your generating units Approval: #Active-Verified Elements#</p> <p>Please note that only those elements that have been set to Active-Verified by the WREGIS Administrator will be tracked for reported generation on created Certificates. Check your generating unit's registration screen to verify which elements have been verified by the WREGIS Administrator.</p> <p>The following Reporting Entity and Reporting Entity Unit ID was selected/entered for generation data reporting purposes: Imperial Irrigation District: 61646C</p> <p>Lastly, the Generation Activity log for this generating unit has been created, and the generating unit has been assigned to the Default - 4803 Active Sub-Account.</p> <p>If you have any questions, please contact the WREGIS Administrator. WREGIS Administrator Tel: 1-888-225-4213 Email: wregishelp@wecc.biz</p>	WREGIS Administrator

My Event Log - All events - Account Holder ID:925

Date	Event Information	Login Name
03/18/2015 12:23:25	The 'Alhambra Solar facility - Alhambra Solar Facility' facility has been modified.	WREGIS Administrator
03/10/2015 10:39:58	The 'Sonora Solar Facility - Sonora Solar Facility' facility has been modified.	royckskinner
03/10/2015 10:39:58	The 'Sonora Solar Facility - Sonora Solar Facility' facility has been modified.	royckskinner
03/10/2015 10:39:15	The 'Alhambra Solar facility - Alhambra Solar Facility' facility has been modified.	royckskinner
03/10/2015 10:39:15	The 'Alhambra Solar facility - Alhambra Solar Facility' facility has been modified.	royckskinner
03/10/2015 10:33:50	The 'Arkansas Solar Facility - Arkansas Solar Facility' facility has been modified.	royckskinner
03/10/2015 10:33:50	The 'Arkansas Solar Facility - Arkansas Solar Facility' facility has been modified.	royckskinner
03/09/2015 10:59:38	The 'SG2 Imperial Valley LLC' account has been modified.	royckskinner
02/12/2015 08:42:00	The 'Sonora Solar Facility - Sonora Solar Facility' facility has been modified.	royckskinner
02/12/2015 08:41:59	The 'Sonora Solar Facility - Sonora Solar Facility' facility has been modified.	royckskinner
02/12/2015 08:41:03	The 'Arkansas Solar Facility - Arkansas Solar Facility' facility has been modified.	royckskinner
02/12/2015 08:41:03	The 'Arkansas Solar Facility - Arkansas Solar Facility' facility has been modified.	royckskinner
02/12/2015 08:39:49	The 'Alhambra Solar facility - Alhambra Solar Facility' facility has been modified.	royckskinner
02/12/2015 08:39:49	The 'Alhambra Solar facility - Alhambra Solar Facility' facility has been modified.	royckskinner
01/29/2015 06:47:57	The 'Sonora Solar Facility - Sonora Solar Facility' facility has been created.	royckskinner
01/29/2015 06:47:57	The 'Sonora Solar Facility - Sonora Solar Facility' facility has been inserted.	royckskinner
01/29/2015 06:42:43	The 'Arkansas Solar Facility - Arkansas Solar Facility' facility has been created.	royckskinner
01/29/2015 06:42:43	The 'Arkansas Solar Facility - Arkansas Solar Facility' facility has been inserted.	royckskinner
01/29/2015 06:37:03	The 'Alhambra Solar facility - Alhambra Solar Facility' facility has been created.	royckskinner
01/29/2015 06:37:03	The 'Alhambra Solar facility - Alhambra Solar Facility' facility has been inserted.	royckskinner
02/24/2014 14:11:37	The 'SG2 Imperial Valley LLC' account has been approved.	WREGIS Administrator
01/28/2014 14:33:14	<p>The SG2 Imperial Valley LLC WREGIS account has been activated. The registration information is now available in your New Account Administrator Inbox.</p> <p>If you have any questions, please contact the WREGIS Administrator. WREGIS Administrator Tel: 1-888-225-4213 Email: wregishelp@wecc.biz</p>	royckskinner
01/28/2014 12:58:54	<p>Congratulations, you have completed the first step of the Account Registration process. The final step must still be completed by your account Administrator.</p> <p>https://portal2.wregis.org/myModule/reg/actAcc.asp?id=2058</p> <p>The final step requires you take action to activate Your Account. Click on the following link in this e-mail and then login to the WREGIS Application. Once you have completed the login, you will have completed the final step. If an error message appears when you click on the link, or if your window does not function properly, copy the link, paste it into the address line on your browser window, and press the Enter key to access the WREGIS system. Make sure you select the entire link. Once activated, you will have limited access and functionality until the WREGIS administrator approves your account. Approval should take no longer than one week. You will receive an e-mail message with approval verification or with request for more information.</p> <p>If you have any questions, please contact the WREGIS Administrator.</p>	royckskinner

My Event Log - All events - Account Holder ID:925

Date	Event Information	Login Name
	WREGIS Administrator Tel: 1-888-225-4213 Email: wregishelp@wecc.biz	

ATTACHMENT 3
EMAIL EXCHANGES WITH WREGIS

Dawson, Robert (SPC)

From: Dawson, Robert (SPC)
Sent: Friday, July 10, 2015 5:15 PM
To: Dawson, Robert (SPC)
Subject: FW: WREGIS account for SG2 Imperial Valley, LLC

From: WREGIS ADMIN [<mailto:wregisadmin@wecc.biz>]
Sent: Monday, March 09, 2015 1:37 PM
To: Dawson, Robert (SPC)
Cc: WREGIS ADMIN
Subject: RE: WREGIS account for SG2 Imperial Valley, LLC

Robert,

WREGIS has yet to receive the required documentation for the three generating units listed below. Please see the Generating Unit Registration portion of the [Join WREGIS](#) page of www.wregis.org for a full list of required documentation. Feel free to let me know if you have any questions.

Kind Regards,

Chloé Herrman
Program Coordinator, WREGIS
Western Electricity Coordinating Council
155 North 400 West
Suite 200
Salt Lake City, Utah 84103-1114
801-883-6898
www.wecc.biz

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From: Dawson, Robert (SPC) [<mailto:ROBDAWSO@southernco.com>]
Sent: Monday, March 09, 2015 12:25 PM
To: Frantz, Mary
Subject: WREGIS account for SG2 Imperial Valley, LLC

Good afternoon Mary,

I am writing to inquire about the status of the WREGIS accounts for SG2 Imperial Valley, LLC. The project names are Alhambra (W4479), Sonora (W4481) and Arkansas (W4480).

Is that something you can help with?

Robert G. Dawson, Jr.

SPC - Asset Management

Office (205) 257-5718

Cell (205) 617-6479

Dawson, Robert (SPC)

From: Dawson, Robert (SPC)
Sent: Friday, July 10, 2015 5:10 PM
To: Dawson, Robert (SPC)
Subject: FW: SG2 Imperial Valley, LLC

From: Dawson, Robert (SPC)
Sent: Monday, March 09, 2015 3:10 PM
To: wregisadmin@wecc.biz
Cc: 'Lee Samaie'; Dawson, Robert (SPC)
Subject: SG2 Imperial Valley, LLC

Good afternoon,

I am about to send several emails containing the rest of the required documentation for SG2 Imperial Valley, LLC. I have broken the information into 5 different emails due to the size of some documents.

The information contained is:

- EIA 860 for most recent year
- Utility Interconnection Agreement
- Manufacturer's specifications
- Revenue meter ID
- Purchase Power Agreement
- Rights to environmental attributes (rights to register generator in WREGIS)
- Notification of Commercial Operation (i.e. Substantial Completion Certificate)

Robert G. Dawson, Jr.

SPC - Asset Management
Office (205) 257-5718
Cell (205) 617-6479