

CALIFORNIA ENERGY COMMISSION

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SACRAMENTO, CA 95814-5512
www.energy.ca.gov



August 19, 2015

California Energy Commission

DOCKETED**11-RPS-01**

TN # 761HE

AUG 19 2015

Mr. Joseph R. Styslinger
Asset & Trading Manager
Southern Power Company
600 North 18th Street
Birmingham, AL 35203

RE: SG2 Imperial Valley LLC's Request for the Creation of Retroactive RECs in WREGIS for Sonora (CEC-RPS-ID No. 61645A), Alhambra (CEC-RPS-ID No. 61646A), and Arkansas (CEC-RPS-ID No. 61844A)

Dear Mr. Styslinger:

This is in response to SG2 Imperial Valley LLC's July 17, 2015, request for the creation of retroactive renewable energy credits (RECs), consistent with WREGIS Operating Rules Section 12.9. The Energy Commission adopted Resolution No. 14-1007-10 at its October 7, 2014, business meeting which established a process to allow the Executive Director to authorize the creation of retroactive RECs in WREGIS for RPS certified facilities in certain circumstances, and specified the criteria and process for requesting such creation of retroactive RECs in WREGIS. This Resolution was subsequently incorporated into the *RPS Eligibility Guidebook, 8th Edition*, which was also adopted at its June 10, 2015, business meeting.

Energy Commission staff has reviewed the documentation submitted by SG2 Imperial Valley LLC, pursuant to Resolution No. 14-1007-10. Based on the explanation of the circumstances surrounding SG2 Imperial Valley LLC's inability to register and obtain approval in WREGIS in a timely manner and the financial consequences of not granting the creation of retroactive RECs in WREGIS, I have determined it is appropriate to approve your request for the generation of the three facilities from March 2014 through November 2014.

Energy Commission staff will forward this request to WREGIS staff for its consideration and approval to create retroactive RECs in WREGIS and invoice SG2 Imperial Valley LLC for all costs and expenses incurred by WREGIS staff. Meanwhile, SG2 Imperial Valley LLC is required to submit an audit report for the three facilities, consistent with the criteria listed in the *RPS Eligibility Guidebook, 8th Edition*, within 90 days from this approval date. The Energy Commission will notify you regarding the approval of retroactive RECs in WREGIS and once all the requirements are met.

If you have further questions about this matter, please contact Christina Crume at Christina.Crume@energy.ca.gov or 916-654-4674.

Sincerely,

Robert P. Oglesby
Executive Director

cc: Christina Crume
Gabe Herrera