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November 13, 2015

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

California Energy Commission

DOCKETED

11-RPS-01

TN # 76398

NOV 19 2015

Re: Request for Extension of Due Date for Submission of Audit Report

Dear Mr. Oglesby:

SG2 Imperial Valley, LLC ("SG2") respectfully requests a 60-day extension of the due date for submission of the audit report supporting SG2's request for retroactive creation of Renewable Energy Credits ("RECs") for the Sonora Solar Facility (CEC-RPS-ID # 61645A), Alhambra Solar Facility (CEC-RPS-ID # 61646A), and Arkansas Solar Facility (CEC-RPS-ID # 61844A) under the process prescribed in Section III.A.1.a of the Commission's Renewables Portfolio Standard Eligibility Guidebook, 8th edition ("Guidebook"). SG2 submits this request pursuant to Section VII.D.4 of the Guidebook.

In accordance with the Guidebook, the audit report is due 90 days after the request for creation of retroactive RECs is approved by the Executive Director. You approved SG2's request in your letter of August 19, 2015, and the audit report is due on November 17, 2015.

SG2 initially submitted the audit report dated November 3, 2015 and received by the California Energy Commission on November 4, 2015, on the understanding that a letter from the Western Renewable Energy Generation Information System (WREGIS), an independent, renewable energy tracking system for the region covered by the Western Electricity Coordinating Council (WECC), would meet the requirements. However, after discussions with Commission staff, it appears that additional information is needed to complete the report. Specifically, SG2 and its auditor may need to obtain additional letters confirming that the RECs were not generated in other state regulatory or voluntary programs, in addition to WREGIS confirmation the RECs were not created. The WREGIS letter (in the format of an email) addressed to the auditors was submitted via email on November 11, 2015 as part of a proposed audit report revision.

An extension is needed to allow sufficient time to obtain these letters from other state and voluntary programs. SG2 became aware of the need to obtain these letters only during discussions with Commission staff earlier this week. SG2 understands that its request is the first such request for creation of retroactive RECs, and accordingly a proven path for compliance with the Guidebook's requirements has not yet been established. SG2 will work diligently to obtain these letters, but at this point we are unlikely to receive the letters before the November 17 deadline. In addition, a more extensive audit may be required that will require more than 30 days to complete. For that reason, we are requesting an extension of 60 days.

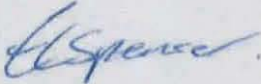
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The retroactive RECs that SG2 is seeking were generated during an extended period before the projects began commercial operation. The value that the counterparty to the purchase power agreement is attributing to these RECs if SG2 is unable to deliver them is approximately \$4 million.

SG2 appreciates your consideration of this request and respectfully asks you to grant its requested extension before November 17, 2015 the current due date.

Please let me know if you require any additional information.

Sincerely,



Elliott Spencer
Comptroller & Corporate Secretary
Southern Power Company & SG2 Imperial Valley, LLC