

PUBLIC UTILITIES COMMISSION

SAN FRANCISCO, CA 94102-3298



April 2, 2012

Advice Letter 2547-E/E-A

Akbar Jazayeri
Vice President, Regulatory Operations
Southern California Edison Company
P O Box 800
Rosemead, CA 91770

**Subject: Submission of Contracts for Procurement of Renewable Energy Resulting
from Renewables Standard Contracts Program and Supplemental Filing**

Dear Mr. Jazayeri:

Advice Letter 2547-E/E-A are effective December 15, 2011 per Resolution E-4445.

Sincerely,

A handwritten signature in cursive script that reads "Edward F. Randolph".

Edward F. Randolph, Director
Energy Division

April 15, 2011

ADVICE 2547-E-A
(U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Supplement to Submission of Contracts for Procurement of
Renewable Energy Resulting From Renewables Standard
Contracts Program

On January 31, 2011, Southern California Edison Company ("SCE") filed Advice 2547-E, which seeks California Public Utilities Commission ("Commission" or "CPUC") approval of 20 Renewables Portfolio Standard ("RPS") power purchase agreements ("RSC Contracts") resulting from SCE's 2010 Renewables Standard Contracts ("RSC") Program.

The purpose of this advice filing is to: (1) provide amendments to the RSC Contracts to include the new standard terms and conditions required for bundled RPS contracts under Decision ("D.")10-03-021, as modified by D.11-01-025, (2) provide an amendment to the RSC Contract with Sierra View Solar V LLC and (3) supplement Advice 2547-E in order to make minor corrections.

SCE has entered into an amendment for each of the RSC Contracts ("RSC Contracts Amendments") to include the new standard terms and conditions required for bundled RPS contracts under D.10-03-021, as modified by D.11-01-025. Confidential Attachment 6 to this advice filing provides the RSC Contracts Amendments to the Commission. The RSC Contracts now include all non-modifiable standard terms and conditions required by the Commission.

SCE is also submitting Amendment No. 1 to the RSC Contract with Sierra View Solar V LLC, which was amended to make a minor change in location.¹

¹ The RSC Contracts Amendments are all first amendments with the exception of the amendment with Sierra View Solar V LLC, for which Amendment No. 2 provides the new standard terms and conditions.

Finally, SCE is submitting certain revised pages of the Advice Letter and attachments to make minor corrections. These revised pages include revised pages of the Independent Evaluator Report with similar minor corrections. These minor revisions do not change the evaluation of the RSC Contracts presented in Advice 2547-E. Accordingly, SCE requests that the Commission expeditiously approve Advice 2547-E.

In accordance with General Order (“GO”) 96-B, the confidentiality of information included in this advice filing is described below. This advice filing contains both confidential and public attachments as listed below.

Attachment 1: Confidentiality Declaration

Attachment 2: Corrected Page of Advice Letter

Confidential Attachment 3: Corrected Page of Confidential Appendix B – 2010 RSC Program Solicitation Overview and 2009 Solicitation Workpapers

Attachment 4: Corrected Pages of Public Appendix C - Independent Evaluator Report

Confidential Attachment 5: Corrected Page of Confidential Appendix C – Confidential Appendix A to Independent Evaluator Report

Confidential Attachment 6: RSC Contracts Amendments

Confidential Attachment 7: Amendment No. 1 to the RSC Contract with Sierra View Solar V LLC

BACKGROUND

SCE filed Advice 2547-E seeking Commission approval of the RSC Contracts on January 31, 2011. SCE submits this supplement to include the RSC Contracts Amendments for each of the RSC Contracts. As demonstrated in Advice 2547-E, the RSC Contracts already included the Commission’s non-modifiable standard terms and conditions on: (1) “CPUC Approval;” (2) “RECs and Green Attributes;” (3) “Eligibility;” and (4) “Applicable Law.” In D.10-03-021, as modified by D.11-01-025, the Commission added two new non-modifiable standard terms and conditions for bundled RPS contracts: (1) “Transfer of Renewable Energy Credits;” and (2) “Tracking of RECs in WREGIS.” These terms were added to the RSC Contracts through the RSC Contracts Amendments, which are attached as Attachment 6 to this advice filing. Accordingly, the RSC Contracts now include all of the Commission’s required non-modifiable standard terms and conditions.

SCE is also submitting Amendment No. 1 to the RSC Contract with Sierra View Solar V LLC, which was amended to make a minor change in location. This amendment is attached as Attachment 7 to this advice filing.

Finally, SCE submits this supplement to Advice 2547-E to make minor corrections to certain information in the Advice Letter and in Confidential Appendix B. SCE is including corrected pages for the public and confidential versions of the Independent Evaluator Report, which was prepared by the Independent Evaluator and which provides similar minor corrections. The corrected pages of the Advice Letter and Confidential Appendix B, with the changes shown in redline, are included as Attachments 2 and 3. The corrected pages for the public and confidential versions of the Independent Evaluator Report, with the changes shown in redline, are included as Attachments 4 and 5. These minor revisions do not change the evaluation of the RSC Contracts presented in Advice 2547-E. Accordingly, SCE requests that the Commission expeditiously approve Advice 2547-E.

CONFIDENTIALITY

SCE is requesting confidential treatment of Confidential Attachments 3, 5, 6 and 7 to this advice filing. The information for which SCE is seeking confidential treatment is identified in the Confidentiality Declaration attached as Attachment 1. The confidential version of this advice filing will be made available to appropriate parties (in accordance with SCE's Proposed Protective Order, as discussed below) upon execution of the required non-disclosure agreement. Parties wishing to obtain access to the confidential version of this advice filing may contact Joni Templeton in SCE's Law Department at Joni.Templeton@sce.com or (626) 302-6210 to obtain a non-disclosure agreement. In accordance with GO 96-B, a copy of SCE's Proposed Protective Order was attached as Appendix X to Advice 2547-E. It is appropriate to accord confidential treatment to the information for which SCE requests confidential treatment in the first instance in the advice letter process because such information is entitled to confidentiality protection pursuant to D.06-06-066 and is required to be filed by advice letter as part of the process for obtaining Commission approval of RPS power purchase agreements.

The information in this advice filing for which SCE requests confidential treatment, the pages on which the information appears, and the length of time for which the information should remain confidential, are provided in Attachment 1. This information is entitled to confidentiality protection pursuant to D.06-06-066 (as provided in the Investor-Owned Utility ("IOU") Matrix). The specific provisions of the IOU Matrix that apply to the confidential information in this advice filing are identified in Attachment 1.

TIER DESIGNATION

Pursuant to GO 96-B, Energy Industry Rule 5.3, SCE submits this advice filing with a Tier 3 designation (effective after Commission approval).

EFFECTIVE DATE

SCE requests that this advice filing become effective on July 29, 2011, subject to review and approval by the Commission.

PROTESTS

SCE asks that the Commission maintain the original protest and comment period as designated in Advice 2547-E and not reopen the protest period or allow additional comments. The minor corrections included in this supplemental advice filing do not change the overall evaluation or reasonableness of the RSC Contracts.

NOTICE

In accordance with Section 4 of GO 96-B, SCE is furnishing copies of this advice filing to the interested parties shown on the attached R.08-08-009, R.06-02-012, and GO 96-B service lists. Address change requests to the GO 96-B service list should be directed to AdviceTariffManager@sce.com or at (626) 302-2930. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at ProcessOffice@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by filing and keeping the Advice Letter at SCE's corporate headquarters. To view other SCE advice letters filed with the Commission, log on to SCE's web site at <http://www.sce.com/AboutSCE/Regulatory/adviceletters/>.

All questions concerning this Advice Letter should be directed to Laura Genao at (626) 302-6842 (E-mail: Laura.Genao@sce.com).

Southern California Edison Company

Akbar Jazayeri

AJ:lg:sq
Enclosures

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: James Yee

Phone #: (626) 302-2509

E-mail: James.Yee@sce.com

E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
 PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2547-E-A

Tier Designation: 3

Subject of AL: Supplement to Submission of Contracts for Procurement of Renewable Energy Resulting From Renewables Standard Contracts Program

Keywords (choose from CPUC listing): Compliance, Contracts, Procurement

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

D.10-03-021 and D.11-01-025

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: _____

Summarize differences between the AL and the prior withdrawn or rejected AL¹: _____

Confidential treatment requested? Yes No

If yes, specification of confidential information: See Attachment 1

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement.

Name and contact information to request nondisclosure agreement/access to confidential information:

Joni Templeton, Law Department, at (626) 302-6210 or Joni.Templeton@sce.com.

Resolution Required? Yes No

Requested effective date: 7/29/11 No. of tariff sheets: -0-

Estimated system annual revenue effect: (%): _____

Estimated system average rate effect (%): _____

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: None

Service affected and changes proposed¹: _____

Pending advice letters that revise the same tariff sheets: _____

¹ Discuss in AL if more space is needed.

All other correspondence regarding this AL shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Ave.,
San Francisco, CA 94102
inj@cpuc.ca.gov and mas@cpuc.ca.gov

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2244 Walnut Grove Avenue
Rosemead, California 91770
Facsimile: (626) 302-4829
E-mail: AdviceTariffManager@sce.com

Bruce Foster
Senior Vice President, Regulatory Affairs
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San Francisco, California 94102
Facsimile: (415) 929-5540
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Marc Ulrich
Vice President, Renewable and Alternative Power
c/o Mike Marelli
Southern California Edison Company
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Rosemead, California 91770
Facsimile: (626) 302-1103
E-mail: Mike.Marelli@sce.com

With a copy to:

Joni A. Templeton
Attorney
Southern California Edison Company
2244 Walnut Grove Avenue, 3rd Floor
Rosemead, California 91770
Facsimile: (626) 302-1935
E-mail: Joni.Templeton@sce.com

Attachment 1

Confidentiality Declaration

**DECLARATION OF CARRIE THOMPSON REGARDING THE CONFIDENTIALITY
OF CERTAIN DATA**

I, Carrie Thompson, declare and state:

1. I am a Project Manager in the Renewable and Alternative Power Department of Southern California Edison Company (“SCE”). As such, I have reviewed this advice filing. I make this declaration in accordance with California Public Utilities Commission Decisions (“D.”) 06-06-066 and D.08-04-023, issued in Rulemaking 05-06-040. I have personal knowledge of the facts and representations herein and, if called upon to testify, could and would do so, except for those facts expressly stated to be based upon information and belief, and as to those matters, I believe them to be true.

2. Listed below are the data in this advice filing for which SCE is seeking confidential protection and the categories of the Matrix of Allowed Confidential Treatment Investor Owned Utility (“IOU”) Data (“Matrix”) appended to D.06-06-066 to which these data correspond.

Data	Pages	Matrix Category	Limitations on Confidentiality Specified in Matrix
Corrected page B-1 for 2009 Solicitation Overview and Workpapers	Confidential Attachment 3	VII.F/VII.G RPS Contracts VII.H Score sheets, analyses, evaluations of proposed RPS projects VIII.A Bid Information VIII.B Specific quantitative analysis involved in the scoring and evaluation of participating bids	RPS contracts confidential for three years, or until one year following expiration, whichever comes first. Score sheets, analyses, evaluations of proposed RPS projects confidential for three years. For bid information, total number of projects and megawatts bid by resource type public after final contracts submitted to CPUC for approval. Specific quantitative analysis involved in the scoring and evaluation of participating bids confidential for three years after winning bidders selected.

Corrected page 12 of Confidential Appendix A to Independent Evaluator Report	Confidential Attachment 5	VII.F/VII.G RPS Contracts VII.H Score sheets, analyses, evaluations of proposed RPS projects VIII.A Bid Information VIII.B Specific quantitative analysis involved in the scoring and evaluation of participating bids	RPS contracts confidential for three years, or until one year following expiration, whichever comes first. Score sheets, analyses, evaluations of proposed RPS projects confidential for three years. For bid information, total number of projects and megawatts bid by resource type public after final contracts submitted to CPUC for approval. Specific quantitative analysis involved in the scoring and evaluation of participating bids confidential for three years after winning bidders selected.
RSC Contracts Amendments	Confidential Attachment 6	VII.F/VII.G RPS Contracts	RPS contracts confidential for three years, or until one year following expiration, whichever comes first.
Amendment No. 1 to the RSC Contract with Sierra View Solar V LLC	Confidential Attachment 7	VII.F/VII.G RPS Contracts	RPS contracts confidential for three years, or until one year following expiration, whichever comes first.

3. I am informed and believe and thereon allege that the data in the table in paragraph 2 above cannot be aggregated, redacted, summarized, masked or otherwise protected in a manner that would allow partial disclosure of the data while still protecting confidential information, because the data request requires that the data be provided in this form.

4. I am informed and believe and thereon allege that the data in the table in paragraph 2 above has never been made publicly available.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 14, 2011 at Rosemead, California.



Carrie Thompson

Attachment 2

Corrected Page of Advice Letter 2547-E

highest levelized price up to the 250 MW program cap. SCE seeks approval in this Advice Letter for 20 contracts executed through the 2010 RSC Program.²

All of the RSC Contracts are for 20-year terms and are for solar photovoltaic (“PV”) projects constructing new facilities. Solar PV is a mature and proven renewable energy technology that has been supplying a substantial amount of renewable energy to SCE and other California load-serving entities (“LSEs”) for several years. All RSC Contracts are priced below the approved 2009 market price referents (“MPRs”), the most current MPRs available when the offers for the RSC Contracts were received.³

The table below provides information regarding each of the 20 RSC Contracts. Additional information regarding the owners and developers of the 20 projects can be found in section III.A.

Project name	Technology	General Location	Interconnection Point	Owner(s) / Developer(s)	Project background	Source of agreement
Lancaster Dry Farm Ranch B	Solar PV	Lancaster	Switchgear on site	Silverado Power	New Project	RSC RFO
Sierra Solar Greenworks	Solar PV	Lancaster	Switchgear on site	Silverado Power	New Project	RSC RFO
Lancaster WAD B	Solar PV	Lancaster	Switchgear on site	Silverado Power	New Project	RSC RFO
Central Antelope Dry Ranch B	Solar PV	Lancaster	Switchgear on site	Silverado Power	New Project	RSC RFO
Central Antelope Dry Ranch C	Solar PV	Lancaster	Switchgear on site	Silverado Power	New Project	RSC RFO
Victor Dry Farm Ranch A	Solar PV	Victorville	Switchgear on site	Silverado Power	New Project	RSC RFO
Victor Dry Farm Ranch B	Solar PV	Victorville	Switchgear on site	Silverado Power	New Project	RSC RFO
North Lancaster Ranch	Solar PV	Lancaster	Switchgear on site	Silverado Power	New Project	RSC RFO
American Solar	Solar PV	Lancaster	Switchgear on site	Silverado Power	New Project	RSC RFO

² A total of 21 contracts were originally executed through the 2010 RSC Program. One contract is pending termination and is therefore not included in this filing. ~~was subsequently terminated.~~

³ The 2009 MPRs were approved on December 17, 2009, in Resolution E-4298. No 2010 MPRs have been issued by the CPUC.

Confidential Attachment 3

**Corrected Page of Confidential Appendix B – 2010 RSC Program
Solicitation Overview and 2009 Solicitation Workpapers**

Attachment 4

Corrected Pages of Pubic Appendix C - Independent Evaluator Report

CONTRACTS SIGNED BY SCE FOR 2010 RENEWABLE STANDARD CONTRACTS RFO				
Project Sponsor	Project	Location	Capacity (MW AC)	Est. Online Date
Amonix, Inc.	Blythe Solar Power Generation Station 1 LLC	Blythe	4.7	June-13
Amonix, Inc.	Garnet Solar Power Generation Station 1 LLC	North Palm Springs	4.8	June-13
Amonix, Inc.	Littlerock Solar Power Generation Station 1 LLC	Littlerock	5.0	Apr-13
Amonix, Inc.	Lucerne Solar Power Generation Station 1 LLC	Lucerne Valley	14.0	Mar-14
Clear Peak Energy, Inc.	Holiday Solar Array	Lancaster	8.5	Dec-13
Foresight Renewables, LLC	Nicolis, LLC	Weldon	20.0	Sep-13
Foresight Renewables, LLC	Tropico, LLC	Rosamond	14.0	Sep-13
juwi solar inc.	Sierra View Solar IV	Lancaster	19.0	Dec-13
juwi solar inc.	Sierra View Solar V	Mojave	19.0	Dec-13
Recurrent Energy	RE Columbia 2	Mojave	20.0	Jan-14
Recurrent Energy	RE Columbia 3	Mojave	10.0	Jan-14
Silverado Power	American Solar Greenworks	Lancaster	15.0	Apr-14
Silverado Power	Central Antelope Dry Ranch B	Lancaster	5.0	Apr-14
Silverado Power	Central Antelope Dry Ranch C	Lancaster	20.0	Apr-14
Silverado Power	Lancaster Dry Farm Ranch B	Lancaster	5.0	Apr-14
Silverado Power	Lancaster WAD B	Lancaster	5.0	Apr-14
Silverado Power	North Lancaster Ranch	Lancaster	20.0	Apr-14
Silverado Power	Sierra Solar Greenworks	Lancaster	20.0	Apr-14
Silverado Power	Victor Dry Farm Ranch A	Victorville	5.0	Apr-14
Silverado Power	Victor Dry Farm Ranch B	Victorville	5.0	Apr-14
Spinnaker Energy, LLC	Cabazon West Wind	Cabazon	19.5	Sep-12
# of Contracts		21		
# of Project Sponsors		7		
# of MWs		258.5		
Technology: All Projects are Solar PV except for Cabazon West Wind, which is a wind energy project.				

~~Subsequently, the~~ The power purchase agreement (“PPA”) with Spinnaker Energy, LLC ~~was pending termination.~~ As a result, SCE is seeking approval for 20 RSCs for projects with 239 MW of installed capacity.

some projects had moved up from the provisional short list. In addition, the amount of projects and MWs on the provisional shortlist had dropped substantially.³⁵

Based on our involvement, our assessment is that SCE reasonably followed the criteria set forth in the RFO Participant Instruction in the evaluation and selection process portion of the solicitation. As stated previously, our recommendation is that in future solicitations that (a) the seller concentration limits be explicitly addressed in the RFO program design documents so that all bidders are informed of them before bids are submitted and (b) the analysis that would be conducted regarding ability to achieve commercial operation by a specified date be explained before the submission of bids. With that being said, we believe that the evaluation that was conducted was consistent and equitable among different Offerors and proposed projects. No evidence of bias was present.

Based on our assessment of the evaluation process relative to the above criteria, it is our opinion that all Offerors were treated fairly and consistently and all generally had access to the same amount and quality of information.

As indicated previously, SCE maintained a website dedicated to the 2010 RSC RFO and posted the RFO documents on the website as well as presentations from the two web conferences, questions and answers and audio recordings of the web conferences. We observed no difference in the treatment of Offerors regarding clarification questions, correspondence and communications with Offerors, and follow-up contacts.

We did have concerns, however, with the way that SCE communicated the relationship between its willingness to go forward with the RSC program to contract execution and the pending Commission decision on RAM. SCE's statement to prospective bidders one week before offers were due that "SCE will not execute contracts from this solicitation" "if . . . the RAM proposed decision is not satisfactorily resolved by November 15" raised a number of questions from the IE's perspective. Would making such a statement shortly before offers were due discourage prospective bidders from participating in the solicitation and produce a suboptimal level of competition? On the other hand, since the RSC was a voluntary program and SCE was considering not going forward with it unless it would receive "credit" from the CPUC toward its obligations under a RAM decision, would it have been inappropriate for SCE *not* to provide notice to prospective bidders regarding the potential for conclusion of the RSC RFO without signed contracts? Assuming that it was appropriate to provide notice to prospective bidders, did SCE do it in a reasonable fashion by stating that it "will not" execute contracts if it did not receive a satisfactory RAM decision?

Importantly, the market's response to the solicitation was very strong—the solicitation was highly competitive. There is no indication that any prospective bidder in fact decided not to submit an offer due to SCE's statements prior to the due date for offers. Further, we concur with SCE's decision to inform prospective bidders regarding the potential for not executing contracts as a result of the solicitation due to the interaction

³⁵ As indicated previously, one project for which a PPA was executed is not the subject of SCE's advice letter because the PPA ~~was subsequently pending~~ terminated.

Confidential Attachment 5

**Corrected Page of Confidential Appendix C -
Confidential Appendix A to Independent Evaluator Report**

Confidential Attachment 6
RSC Contracts Amendments

Confidential Attachment 7

**Amendment No. 1 to the RSC Contract with
Sierra View Solar V LLC**