



Feed In Tariff Workshop Survey

May 29, 2014

Interest: Developer/Installer Current Owner/Investor Prospective Owner/Investor Advocate

Technology: Solar Electric Solar Thermal Wind Biomass Biofuel Other all renewables

Specific Questions:

1 What can we do to streamline local project development?

To the extent that permitting and interconnection are outside the purview of SCP offering clarity and certainty to the greatest extent practical will support interest and participation in the FIT. The PPA application and reservation list should be publicly posted to help indicate how much capacity remains available in the program Utilizing the PG&E project ID will maintain confidentiality while providing valuable insight on project status through PG&E's public queue data

2 Do you prefer a reservation system or full interconnection agreement requirement at time of application? Why?

The requirements for FIT application are significant. It is appropriate to require completion of studies (PG&E tendered GIA) prior to signing a PPA, and to require commitment within 60 days (sign GIA & submit GIA deposits). However, with the 60 day limit, there is no need to rush an applicant through PG&E final negotiations. SCP and other applicants are protected by the 60 day commitment milestone.

3 Temporary (5 year) bonuses are proposed on top of the fixed tariff for certified local contractors and local project labor (both currently defined using Solar Action Alliance methodology). In your opinion, what will be the impact of this bonus on project development?

The proposed bonuses offer significant incentive to increase preferred features, however it is not clear that the marginal changes for qualification will significantly alter projects that will apply anyway under the first-come/first-served approach and program cap.

4 Temporary (5 year) bonuses are proposed on top of the fixed tariff for previously disturbed sites. As written, previously disturbed sites are those for which the area has been developed, compacted or contaminated; land disturbed for agricultural and/or forestry purposes does not comply. In your opinion, what will be the impact of this bonus on project development?

(See above)

Topical Comments:

5 Participation Limits

These appear reasonable and support supplier diversity, increasing the likelihood of local participation. Note that the limit is effectively a single 1 MW PV project per owner.

Legal definition of ownership will require attention to enforce effectively; this may reference the names of persons associated with the company, rather than the corporate ID.

6 Penalties and Fees

Penalties: Per discussion at the workshop, adoption of PG&E's ReMAT standards is recommended. These are familiar to applicants and should achieve the goals intended, while the draft penalties may be excessive.

Fees: The application fee and \$2/kW deposit is reasonable to secure a PPA, but too low to influence on completion of development.

We recommend increasing the development deposit to \$10/kW within no less than 6 months of the PPA COD.

7 Application Schedule and Milestones

Per above: we support the proposed schedule and milestones.

A 60 day window following reservation of signing of a FiT PPA to submit a final Interconnection Agreement and payment of interconnection deposits provides a balance of assurance and flexibility. As an added milestone we recommend increasing the development deposit to \$10/kW within no less than 6 months of the PPA COD.

8 Tariffs and Bonus

The offered price of \$105/MWh should be sufficient to fulfill the program capacity, but is likely to support only a very few projects finding ideal siting opportunities; further development will be inhibited by the scheduled reduction in Federal ITC. The failure of PG&E to pass through transmission savings from projects serving local loads deserves further attention as this represents a 2.7¢/kWh 20 year levelized local value. Likewise, CAISO Deliverability value should be clarified.

9 In your opinion, how important are the following to the success of the program?

Scale: 1 not at all, 2 slightly unimportant, 3 neutral, 4 important, 5 very important

Participation equity for all contractors		1	2	3	4	5	N/A
Base price paid per kWh	very important	1	2	3	4	5	N/A
Bonus price paid per kWh	important	1	2	3	4	5	N/A
Balance between price and ease of implementation	neutral	1	2	3	4	5	N/A
Length of power purchase agreements	important	1	2	3	4	5	N/A
Minimized regulatory hurdles	important, but jurisdiction issues	1	2	3	4	5	N/A
Minimized time before PPA	certainty is more important than time	1	2	3	4	5	N/A
Upfront cost and fees	SCP fees = neutral, other = very important	1	2	3	4	5	N/A

10 Any additional feedback on the Feed In Tariff as proposed?

Site Control: per PG&E requirements for interconnection so as to maintain consistent standards.

11 Any additional feedback on the format of the workshop?

submitted per email

12 What additional informational and/or public input workshop topics are of interest to you?

Name (optional): Sahm White

Organization: Clean Coalition

May we contact you with additional questions? Yes No Preferred contact method: Phone Email

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