

## RAM 4 Q&As

1. Q: Are projects that intend to interconnect utilizing a CAISO queue position greater than 20 MW eligible to participate in RAM?

A: Such a project would not be immediately disqualified from RAM eligibility and may be eligible to participate in RAM. The Respondent would need to demonstrate that the proposed project is a stand-alone project and not a subdivided part of a larger whole. The project size limit the Commission has adopted for the RAM program is 20MW. Breaking up or subdividing larger projects to circumvent the Commission adopted 20 MW project size limit is prohibited. SDG&E will look at the totality of circumstances with respect to a Respondent's bid to determine whether the project is eligible for RAM. Note, SDG&E's current pro-forma RAM PPA does not contain the provisions necessary to address the need for shared facilities. Significant deviations and alterations in the already Commission approved pro-forma RAM PPA may lead to delay or rejection of an executed PPA submitted to the Commission for approval.

2. Q: When are Respondents required to post the necessary Development Period Security? What is the significance of the September 13<sup>th</sup>, 2013 date in the May 2013 RAM RFO schedule?

A: Pursuant to the RAM Decision and the RAM RFO document, Respondents are to post the necessary Development Period Security **on or before** the date the RAM PPA is signed/executed by SDG&E, which is expected to be October 18th. Please see Section C of the May 2013 RAM RFO document for more details. The September 13<sup>th</sup>, 2013 date in the May 2013 RAM RFO schedule is the date by which a shortlisted bidder must either accept or reject its position on SDG&E's shortlist.

3. Q: What defines whether a project is located within the service territory of one of the three investor owned utilities, is it the location of the actual site, point of interconnection, or point of delivery? Would a project site located in San Diego County, but in the Imperial Irrigation District's service territory qualify to participate in the current RAM solicitation?

A: SDG&E cannot restrict a Respondent from proposing a bid, however current RAM rules state that to be eligible for RAM, the project itself (i.e. its physical site location) must be located within the service territory of SDG&E, PG&E, or SCE.

4. Q: Would the aggregation of two 1.5 MW projects under CREST (SCE's CPUC Rule 21 Tariff) connecting to the same pricing node and with a total nameplate capacity of 3 MW, be eligible for this RAM 4 RFO?

A: RAM no longer allows for separate projects to be aggregated to meet the minimum eligibility size necessary to qualify for RAM. However, projects of this size may be eligible for the Feed-in-Tariff or Revised Feed-in-Tariff (Re-MAT) programs.

5. Q: At the time bids are due, Respondent has a binding option to purchase Land A to develop the proposed project and access the point of interconnection. Respondent also has an executed term sheet with a seller for an option to purchase Land B, which is expected to be executed 30 days after the date in which the RAM bids are due. Land B is closer to the point of interconnection, and is the preferred project site due to its closer proximity to the point of interconnection. Would the combination of these sites be considered sufficient for site control, in particular, Land B?

A: RAM eligibility criteria specify that the Respondent, at the time of bidding, must have site control (e.g. direct ownership, a lease, or option to lease or purchase upon PPA approval) for the duration of the 10, 15, or 20-year power purchase agreement. Accordingly, the Land B project site would not be eligible for RAM assuming only a term sheet is executed by the time bids are due (i.e. June 28, 2013). That being said, the Land A project site likely meets RAM site control eligibility requirements as there is a binding option to purchase the land.