Regional Renewable Choice: Question and Answer

General Questions:

- 1. SCE requires all projects to be submitted with a 10-year offer. Does PG&E also require a 10-year offer? No, contract terms of 10, 15, or 20 years are allowable in this RFO. There is no requirement for a ten-year offer.
- 2. Can the PPA rate with the customers differ from the offer rate submitted to PG&E in this offer?

 Yes, PG&E is not a party to the agreement between the customer and the developer. The developer is welcome to have any arrangement or rate with the customer and it does not need to match the offer submitted into the RFO.
- 3. Do Phase 1 marketing materials have to be approved prior to close of auction? Is submittal of marketing materials for review prior to auction close sufficient?
 PG&E requires that participants have completed the marketing material review process at the time of offer submittal.
- 4. SCE requires 5% of Power sold to the utility. Is this true for PG&E?

 No, there is a provision against selling subscriptions that exceed a 100% of the project capacity, but there is no minimum requirement.
- 5. Why does it take 2 months from PPA execution to filing for CPUC approval? How long after filing is CPUC approval expected?

The schedule outlines only one month between the target time frame for execution of agreements which we have as May 10^{th} and the target advice letter filing date of June 10^{th} . The minimum timeframe for CPUC after filing would be 30 days, but if the CPUC needs more time, the approval timeframe can be extended beyond that.

6. Our project has Rule 21 Interconnection Agreements with PG&E and we are looking to submit an offer into the Regional Renewable Choice program. I was curious if our IA would be impacted if our PPA is through the Regional Renewable Choice program.

Under the Project Viability Eligibility Requirements of Section III (page 7) of the Summer and Winter 2018 Regional Renewable Choice Request for Offers Protocol, it states:

"Projects must obtain a wholesale interconnection agreement under FERC jurisdiction prior to operation. Note that Electric Rule No. 21 is not under FERC jurisdiction and does not result in a wholesale interconnection agreement under FERC jurisdiction. Wholesale procedures, both the CAISO and PG&E Wholesale Distribution Tariff generation interconnection procedures, can also be viewed on the PG&E website at: http://www.pge.com/wholesale/."

7. Will projects that fail the distribution provider's Fast Track screen but pass the Fast Track supplemental review be accepted for the RFO?

Projects with passed Supplemental Review studies would be eligible to participate in the solicitation.

8. Why is storage not allowed?

The Regional Renewable Choice program, as currently designed and approved by the CPUC, may source energy solely from renewable generators. Energy storage, including storage charged by renewable resources, has not been addressed in the program to date.

9. Where should participants submit their marketing materials?

Marketing submissions can be made to <u>solarchoicemarketing@pge.com</u>. Green-e plays a significant role in the review of these materials as the bulk of the requirements for the materials stem from Green-e compliance. When materials are submitted to PG&E, they will be forwarded to Green-e and Green-e may liaise directly with some developers on any questions regarding the requirements.

10. In the offer form, what is the difference between an "offer" versus a "variant"?

Sellers may choose the option to bid a single project (offer) with four (4) variations. Variations include project size, term, capacity type, pricing, fixed vs. escalating price, etc.

11. What is the difference between the "technology operating experience" section (in the Product Description tab) versus the Developer Experience tab?

The developer experience section is referring to the developer while the technology operating experience is referring to the personnel performing operations and maintenance.

12. Why is PG&E requiring Full Capacity Deliverability Status (FCDS) for all solicitations launched in 2019 and beyond?

Energy Only (EO) projects connect to the grid, but are not studied for line upgrades through the interconnection process. EO projects may be asked to shut down (be curtailed) if electrical constraints occur.

Full Capacity Deliverability Status (FCDS) projects can physically get the power to where it's most needed on the grid. A fully deliverable project means that there are no chokepoints on the grid stopping power from getting to an end point.

Transmission lines have limited capacity and can only handle a definite portion of energy. Interconnecting projects to the grid that are not fully deliverable can lead to an increased potential for the line being overloaded and risk of being curtailed with the increased congestion. Requiring FCDS will help to prevent these issues for your project and all projects in the area connected to and sharing the capacity of the same transmission line.

13. Can a large project over 20 megawatts bid in a portion of its generation in order to stay under the required thresholds?

Project eligibility for this RFO is capped at 20 megawatts. The project cannot be over 20 megawatts, and if it's part of a larger project, the 20-megawatt portion would need to be separately metered in order to be eligible for the solicitation.

14. If a developer has load that it wants to designate to off-takers or subscribers to fully subscribe an eligible project, can that developer participate in this RFO without fulfilling the marketing process obligations?

In order to be able to market to customers both for community interest and at the time of enrollment, those marketing materials must be approved by Green-e and PG&E.

You can submit your marketing materials to the <u>solarchoicemarketing@pge.com</u> and we'll work with you to complete that process.

Community Interest

15. Does PG&E require account number and service agreement ID information for Expression of Interest or Commitment to Enroll Forms? This information may be challenging to receive from the customer.

The Expression of Interest (EOI) and Commitment to Enroll (CTE) forms may be found on our <u>website</u> under the program-specific requirements for developers. A complete community interest packet must include either the EOI or CTE forms with all completed fields including: customer name, street address, county, account number, service agreement ID, and subscription level.

Please direct the customer to view their <u>PG&E energy statement</u> or log-in to <u>Your Account</u>. The customer's account number is located on the front of the bill in the top right-hand corner and the service agreement ID is on the details of electric charges page. If the customer is having trouble accessing their account number and service agreement ID, the Regional Renewable Choice team will work with the customer directly to identify their correct information. For additional questions, please email us at <u>regionalrenewablechoice@pge.com</u>.

16. Can I start soliciting customer interest/marketing to customers prior to the Demonstration of Community Interest schedule as part of a solicitation?

Once a project has completed the marketing material review process and has its Marketing Review Completeness letter, the developer may commence direct marketing to customers to obtain community interest.

17. Regarding the Community Interest requirement, why is nameplate capacity in MW used rather than estimated annual energy production?

This requirement is derived from CPUC D. 16-05-006.

18. Community Interest: Is the ability to provide guaranteed subscription limited to only municipalities and counties, or does it extend to other public agencies as well?

The community interest requirements are as follows:

- 1. Documentation that community members have:
 - Committed to enroll in 30 percent of the project's capacity or
 - Provided expressions of interest in the project sufficient to reach 51 percent of the project's capacity
- 2. Demonstration that at least 50% (by number of customers) and at least 1/6th (by load) of the demonstrated community interest in the project is from residential subscribers, and
- 3. Demonstration that projects sized from 3 to 20 MWs have a minimum number of unique subscribers equivalent to the nameplate capacity of the project. Projects sized 0.5 MW up to 3 MWs must have a minimum of three different subscribers

D 15-01-051 "if the guarantee is from a municipality working to develop ECR projects in its community, then this guarantee is a sufficient demonstration of community interest" (section 4.10.2.4, page 68). Municipalities or counties may provide a guaranteed subscription rate to demonstrate community interest. This guarantee is subject to the requirements listed above.