

SDG&E 2014 All Source RFO

Questions & Answers / FAQs

Distributed Generation Related Questions

1. Bidder is looking for more clarity on the question/answer below -

The site control specified in section A, paragraph 12 from the DG RFO document seems overly restrictive for a DG asset for initial delivery as late as 2022. Is SDG&E open to evaluating offers that are not able to demonstrate site control at the time of the bidding?

Respondents must have, at time of bidding, site control for the duration of the contract term proposed in their offer. Site control may be evidenced by documentation of:

- a. direct ownership;
- b. a lease; or
- c. an option to lease or purchase upon contract approval. The option must be an exclusive option to the Bidder that will last until the completion of the RFO cycle.

2. Bidder is looking for clarification as to whether fuel cells, micro CHP, and natural gas generators qualify and be considered within the DG category in this RFO?

As stated in the DG conformance document, respondents that believe their resource will fall into the DG category should contact SDG&E at their earliest convenience to discuss the nature of their resource so that SDG&E may provide guidance as to the proper product type. In general, any generation resource that meets the criteria for a specific product type other than DG should fill out the bid forms for that product type (ie: CHP for the CHP resource and conventional for the natural gas generator). Projects that interconnect at distribution voltage and do not meet the criteria for one of the specific product categories may qualify for the RFO as a DG resource. SDG&E would need to discuss specifics in order to give a definitive answer. Also, please note the 'Participation Criteria' within the DG conformance document (section 2.0, A starting on page 14). With regard to small, conventional generation resources - note that the GHG emissions of the resource must be equal to or less than the California Air Resources Board default emission factor of .428 metric tons of CO₂e per MWh - (see See: <http://www.ccdsupport.com/confluence/display/calhelp/Reporting+Form+Instructions> ; scroll down to the row that has "Electric Power Entities" in far left

column and click on the link titled: "Updated 2013 EFs.xls (Updated 8/8/2014 Rev 2). Within the spreadsheet, '2013 EFs' tab, scroll down to row 355 titled "Unspecified --- retail Provider Replacement Poer, per 95111(c)(3)(C)(2), column P).

- 3. Is there any sort of expression of interest required deadline (date) for DG technologies? I understand there was one for storage, is there any deadline or registration that would prevent us from proposing a project by the Jan 5, 2015 offer deadline?**

Please refer to DG RFO schedule on the webpage, <http://www.sdge.com/sdge-2014-request-offers-seeking-dg-power-purchase-agreements>

In short, there is no requirement to provide an expression of interest in the DG product type.

- 4. What is the definition of DG? Please provide an example of DG.**

Any generation resource that interconnects at distribution voltage could be considered Distributed Generation (DG). As far as an example of DG being sought by SDG&E in this all source RFO, small facilities of any of the generation resource types (for example, renewable, CHP or conventional) could be considered an example of DG if the plant is small enough to interconnect at distribution voltage. If, however, the resource type is one of these three, please observe the requirements in the corresponding RFO (renewable, CHP, conventional). However, to the degree that a resource does not fit clearly and cleanly into one of these categories, the DG conformance document provides the conformance requirements for other DG resources that fall outside the defined resource types. See: <http://www.sdge.com/all-source-2014-rfo> and click on the 'Distributed Generation' link.

- 5. What if my bid includes behind the meter dispatchable resources such as Wind, Solar and Energy storage?**

Wind and solar resources are generally considered 'as available' resources and are not generally dispatchable. If your offer is a wind or solar facility, please look to the renewables RFO for guidance. If your offer is for energy storage, please see the energy storage RFO. If your resource is designed as a 'behind the customer meter' resource, please look to the Demand Response (DR) RFO for guidance and requirements. If your resource is a combination of resources, depending on the specifics of the proposal, the energy storage PPTA could serve as the basis for the operation of the facility, or other appropriate contract vehicle.