

Electric Power Daily

Wednesday, January 2, 2013

AEP set to unveil job reductions as part of restructuring

Layoffs could be coming as soon as this week at American Electric Power, one of the largest electric utilities in the US, as the company confronts a host of changes, including a move to market-based rates in its native Ohio and the planned closing of older coal-fired power plants.

"Ohio is deregulating, so our generation will be competitive in Ohio," AEP spokeswoman Melissa McHenry said Monday about one of the key challenges facing the Columbus-based company. In Ohio, AEP plans to hold four power auctions over the next couple of years to facilitate its move to fully competitive generation rates by May 31, 2015.

McHenry declined to say how many of AEP's 18,700 employees in 11 states will be affected by the upcoming work force reorganization, which could be publicly disclosed as soon as Wednesday. "This is not a voluntary severance," she stressed.

For the past several months, a management consultant retained by AEP has
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North Carolina lawmakers may 'freeze' RPS mandate

North Carolina's Republican-dominated General Assembly in 2013 is likely to enact legislation that would "freeze" the state's version of a renewable portfolio standard at its current mandate of only 3%, a key Republican lawmaker said Monday.

The "vast majority" of the 54 members of the North Carolina House of Representatives who were elected for the first time in either 2010 or 2012 would support a bill to amend the state's "renewable energy and energy efficiency portfolio standard" law — better known as S.B. 3 — as would many more veteran legislators, Representative Mike Hager, Republican of Rutherfordton, said in an interview.

"That clearly gives us a majority" in the House, said Hager, who is chairman of the House Public Utilities Committee and the House's newly elected majority whip. "Counting votes is my job," he added.

Hager, a former Duke Energy Carolinas coal-plant engineer who described himself as "a free-market conservative," said that S.B. 3 has increased costs for ratepay-
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Pennsylvania PUC approves PPL plan to increase rates

The Pennsylvania Public Utility Commission approved a \$71 million annual increase in PPL Electric Utilities' distribution rates, which will help offset the cost of system improvements and strengthen PPL's ability to attract capital funding needed to further modernize its grid.

"We're investing \$3.6 billion through 2016 to upgrade our transmission and distribution systems as part of a long-term commitment to strengthen reliability, replace aging infrastructure and improve our service," said Gregory Dudkin, president of PPL Electric Utilities.

The new rates, Dudkin said, will allow PPL to begin recovering the costs from distribution system upgrades made over the past two years and help the utility to attract needed capital funding. The PUC approved the increase Friday.

In 2012, PPL rebuilt hundreds of miles of power lines, added substations and automated parts of its distribution system, as well as stepped up line inspections

J.P. Morgan preparing to monetize wind assets

J.P. Morgan Capital is preparing to monetize a portion of the tax equity in six of the US wind farms in which it holds interests, possibly as soon as mid-January with an offering for an income trust in Canada.

Some details remain unclear, but the basic outlines were laid out in a recent regulatory filing.

J.P. Morgan Capital is selling some of its equity in six wind farms to a newly formed entity known as Threshold Power.

Threshold Power is a wholly owned subsidiary of Threshold Power Holdings, an Ontario corporation. Threshold Power Holdings, in turn, is a wholly owned subsidiary of Threshold Power Trust, an unincorporated open-ended limited purpose trust established under the laws of the Province of Ontario for the purpose of acquiring equity interests in US power projects, according to the filing with the Federal Energy Regulatory Commission.

The FERC filing does not specify the size of J.P. Morgan's holdings in the wind farms,
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California IOUs hold 194 PPAs for renewables

Renewable power under contract with the three largest investor-owned utilities in California is projected to nearly triple by 2015, according to a year-end review of state data by Platts.

The state's three largest IOUs combined have signed 194 power purchase agreements for a total of 16,012 MW to be generated by renewable capacity, according to data provided by the California Public Utilities Commission.

According to the CPUC data posted on its website, Pacific Gas & Electric, Southern California Edison, and San Diego Gas and Electric have 96 long-term contracts for projects that have been approved since 2003 and are currently online. The combined capacity of those facilities is 5,893 MW.

Those same IOUs have subsequently signed an additional 98 PPAs with developers that are currently building projects that will add 10,119 MW of combined capacity.

Of the 96 renewable projects in operation,
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and tree trimming, PPL said in a release.

This year dozens of projects will help PPL deliver power “safely and reliably” for years to come, as well as create jobs and other economic benefits, Dudkin said.

New projects include everything from installing poles, wires and electrical equipment, to investments in smart grid technology, which can help detect where a problem occurs on the line, such as a fallen tree, animal contact or vehicle accident, and automatically reroute power from other lines, Bryan Hay, PPL spokesman, said in an email.

The distribution rate increase and other rate changes, effective Tuesday, will result in a 3% increase in the total monthly bill for an average residential customer using 1,000 kWh a month, who receives generation from PPL, and a 1% increase for small business owners using 1,000 kWh a month. Bills for customers who have switched to other suppliers will depend on the supplier’s prices in 2013.

The new rates will be offset by lower generation charges, PPL said. The average residential customer’s total monthly bill, according to PPL, will be 10% less than what it was at the beginning of 2011, and 12% less than January 2010, when PPL’s generation rate caps expired.

— Gail Roberts

Munis not likely to copy LADWP on decoupling

The Los Angeles Department of Water and Power is likely to remain the only municipal utility in the country with a revenue decoupling mechanism to foster energy efficiency, a spokesman for the American Public Power Association said Monday.

Municipal utilities have efficiency programs that reflect the goals of their customers and communities, but their different governance and regulatory structure compared with investor-owned utilities mean they take different steps and are not likely to approve revenue decoupling, said Nick Braden, spokesman for APPA.

When LADWP adopted the decoupling measure in the fall, the move was hailed by efficiency and environmental advocates as a progressive step for a municipal utility.

In recent years, state regulators have made significant changes to help IOUs promote efficiency programs without hamstringing the utilities’ bottom line through reduced power sales or deliveries. Measures such as lost revenue recovery for reduced usage or revenue decoupling that separates utility earnings from being totally based on energy usage are in place in almost 25 states, with several states debating such step.

The Los Angeles City Council approved the LADWP board’s recommendation on revenue decoupling, setting new power rates that became effective in November, allowing LADWP to collect an agreed upon amount of base revenue. If electricity revenue deviates from the target, the difference is made up the following year through a surcharge or credit, enhancing LADWP’s effectiveness in promoting efficiency programs, said LADWP spokeswoman Carol Tucker.

The revenue decoupling will ensure LADWP “will recover the needed base rate revenue without providing a financial disincentive for the department’s energy efficiency programs,” the LADWP board said.

Combined with LADWP’s efficiency investments, the move “represents a monumental shift in outlook” at the municipal utility, said Ralph Cavanagh, senior attorney and co-director of the energy and transportation program at the Natural Resources Defense Council. LADWP’s leadership through embracing decoupling “will reverberate across the 2,900 other non-profit utilities serving rural and urban America,” Cavanagh said in a blog posted on the NRDC site.

But APPA knows of no other municipal utility with a decoupling mechanism, Braden said. “Typically, public power utilities have greater flexibility to adjust rates on a timely basis, and so, can make changes to rate structures if energy efficiency programs are limiting their ability to fully recover fixed costs,” he said.

— Tom Tiernan

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Georgia Power to issue draft RFP this month

Georgia Power will release the draft version of a request for proposals for 120 MW of utility-scale solar power on January 14, and issue the final version of the RFP on April 12, the utility said Monday. Bids will be due May 7.

Southern Company's largest subsidiary also laid out the first-come/first-served process for selecting the first of two planned 45-MW tranches of smaller, distribution-scale solar projects of less than 1 MW in 2013. A second 45-MW tranche will be picked in 2014.

"Solar costs have dropped dramatically over the last few years," Georgia Power spokesman John Kraft said in explaining why the utility decided that now is the time to solicit its largest batch yet of solar power—a total of 210 MW by the end of 2014.

"Based on cost and other factors, we feel this is the right time to bring a program like this to market," Kraft said. "We've long said we need an 'all arrows in the quiver' approach to generating sources and this program more than triples existing solar resources in Georgia."

The Georgia Public Service Commission on November 20 unanimously approved an accelerated version of Georgia Power's "advanced solar initiative," which originally called for adding a total of 180 MW of utility-scale solar over the next three years at a pace of 60 MW/year, and for adding a total of 30 MW of distribution-scale solar over the same three-year period, at a pace of 10 MW/year.

The PSC-approved plan instead required the utility to add a total of 120 MW of utility-scale solar capacity in 2013-14, as well as 45 MW of smaller, distribution-scale projects in 2013 and 45 MW in 2014.

In the upcoming utility-scale RFP, Georgia Power will consider solar projects of up to 20 MW each. Bidders will submit priced proposals with per-kWh price offers not to exceed 12 cents/kWh. The winners will enter into 20-year power purchase agreements.

Georgia Power said Monday that it will hold a February 20 bidders conference for the utility-scale RFP. Comments on the draft version of the RFP to be issued January 14 will be due February 25, the utility said, and the final version of the RFP will be filed at the PSC on March 21. As noted, the final version of the RFP will be issued April 12.

After bids are received on May 7, Georgia Power will evaluate the proposals and determine a "competitive tier" of finalists by July 31. Negotiations with the short-listed bidders will be completed on or about October 1, it said, and the resulting PPAs will be filed at the PSC on November 15. All of the selected solar projects must begin commercial operation by January 1, 2015.

For the distribution-scale part of Georgia Power's plan, the draft versions of the small-scale (less than 100 kW) and medium-scale (100-kW to 1 MW) "solar service agreements" are now available at: www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=145262

The final versions of the agreements will be issued on January 25, and the application process will begin on March 1,

the utility said.

The capacity of each project proposed under the small- and medium-scale programs cannot exceed the demand of the customer at which the solar facility will be installed. Participants in the small and medium-scale programs will be paid a flat 13 cents/kWh for the power they provide during the 20-year PPAs. Participants in the medium-scale program can opt to receive an escalating price for power that begins at about 8.5 cents/kWh in 2013 and rises to more than 17 cents/kWh by the end of the 20-year agreement.

"There is currently a waiting list ... comprising approximately 5.5 MW" of small-scale projects, "and we suspect a number on the waiting list will take advantage of the program," said Kraft.

Georgia Power noted that if it receives more than 45 MW of approved distribution-scale applications in 2013, "a waiting list will be established" for the 2014 process, when another 45 MW will be accepted.

— Housley Carr

Move to MISO will not affect PPAs: Entergy

Power purchase agreements between Entergy utilities in Texas and Louisiana would not be affected by Entergy joining the Midwest Independent Transmission System Operator, a filing submitted by Entergy to Texas regulators maintains.

On December 21, the Public Utility Commission Texas staff filed a memo describing their discovery that the Louisiana Public Service Commission had begun a proceeding to determine how the move to MISO would affect the PPAs and that "it was the LPSC staff position that some of the PPAs ... would terminate upon the Entergy operating companies joining MISO."

But on Friday afternoon, Entergy Texas filed a memo stating that Entergy Gulf States Louisiana "has made clear its position that joining MISO does not terminate the contracts."

"Importantly, the LPSC staff's position ... conflicts directly with the LPSC's own order approving EGSL's change-of-control to MISO," Entergy's memo says.

At stake are four PPAs involving 5,731 MW, of which 2,269 MW is within Texas and 3,462 MW is in Louisiana. In the PPAs, Entergy Texas sells 57.5% of the Texas facilities' output to Entergy Gulf States Louisiana, and Entergy Gulf States Louisiana sells 42.5% of its units' power to Entergy Texas.

Entergy's operating companies participate in a generation-sharing arrangement known as the Entergy System Agreement, although Arkansas and Mississippi units are planning to exit this agreement in December 2013 and November 2015, respectively.

"EGSL has explained that as members of the ESA, [Entergy Texas'] and EGSL's units will continue to be controlled and dispatched by the Entergy system operator," the Entergy Texas memo states. "The system operator will determine how the generation units owned by ESA members will participate in the MISO market. As a factual matter, the LPSC staff is simply incorrect in its assertion that MISO will assume operational control

of the Entergy operating companies' generators."

But Entergy also plans to seek a determination from the Federal Energy Regulatory Commission on whether the PPAs "terminate when the Entergy operating companies join MISO."

"Entergy Services' position is, and in the forthcoming filing, will be that the contracts do not terminate in this situation," Entergy Texas' filing at the PUC states.

But the PUC asked Entergy to state its position regarding the status of the PPAs if Entergy Texas exits the Entergy System Agreement, and the Entergy Texas memo states that the PPAs "would terminate if Entergy Texas exited the ESA."

Therefore, "to guard against potential adverse effects to Entergy Texas customers due to the termination of the ... PPAs resulting from Entergy Texas' exit from the ESA ... Entergy Texas" committed to update its analysis of the cost of terminating the PPAs, determine whether it would result in unreasonable shifts in production costs between the two companies and, if necessary, set up contracts to maintain the allocation of the costs associated with the PPAs, if allowed by FERC.

— Mark Watson

SPP opts for central counterparty approach

The Southwest Power Pool wants to follow the lead of other independent system operators and become the central counterparty for its markets to comply with the Federal Energy Regulatory Commission's credit reform order, according to a Friday filing.

In its credit reform order, FERC directed the ISOs to ensure that they would be able to net a market participant's purchases and sales in the event of a default (Docket No. RM10-13). FERC gave the ISOs four options for how to comply with its netting rule: become a central counterparty; require market participants who net within or across categories to provide a security interest in their transactions; propose an alternative that would offer the "same degree of protection" as a central counterparty or security interest; or establish a credit requirement based on the market participant's gross obligations.

Although compliance filings on this aspect of Order 741 were due in April, SPP requested and received an eight-month extension to consider how netting will work under the day-ahead market that is developing, which is also known as the integrated marketplace. The other ISOs, which already have day-ahead markets, all chose the central counterparty option.

SPP said in a Friday filing that it would also like to become a central counterparty for its market (Docket No. ER13-661).

Under SPP's proposal, the grid operator will become central counterparty for any transactions in the integrated marketplace for which it is impossible to identify a contract between specific market participants. SPP would not become central counterparty to point-to-point transmission transactions, network integration transmission service and ancillary services agreements, according to the filing.

SPP said it is excluding these types of transactions because

they "are not 'pooled' transactions but are subject to pro forma service agreements whereby the buyer and seller are identifiable for an individual transaction. Therefore, these types of tariff services do not require counterparty status for [SPP]."

SPP said also it would not become the central counterparty for bilateral transactions, including the bilateral transfer of auction revenue rights or transmission congestion rights, which are also known as financial transmission rights in other markets.

The central counterparty approach is supported by SPP's credit practices working group as well as its markets and operations policy committee and its board of directors. SPP said in its filing that the change will not require any changes to the collateral requirements or credit management system that it is currently developing to support the integrated marketplace.

SPP requested that the change become effective on March 1, 2014, when its Integrated Marketplace begins. Comments on the filing are due January 18.

— Juliana Brint

AEP set to unveil job reductions ... from page 1

thoroughly examined the company's businesses and made recommendations for possible changes, she said.

By the end of 2016, she noted, AEP also intends to retire up to 6,000 MW of older coal units in several states to comply with new Environmental Protection Agency rules. The company also is focusing more on electric transmission, and its projected annual expenditure for transmission projects, some through separate transmission companies or transcos, is to increase over the next several years.

And, she added, "There's the fact that, at least for the immediate forecast, demand isn't picking back up."

Indeed, the company in late October cited a drop in demand as one of the reasons for a 48% decline in third-quarter earnings. By the end of September, 37.849% of AEP Ohio's load had switched to competitive suppliers, according to the Public Utilities Commission. AEP Ohio includes the recently merged Ohio Power and Columbus Southern Power. Together, they serve nearly 1.5 million customers in the Midwestern state.

That AEP is forced to respond to a changing utility market by reducing staffing levels is not surprising, Paul Patterson, an analyst with Glenrock Associates, said. That is especially true, he said, "considering what we're seeing with the merchant power sector. There may be some realignments in the workforce."

AEP is not unlike some other electric utilities, including its northern Ohio rival FirstEnergy, in the difficult market issues it is facing, he said.

"AEP is facing all of these issues now, and you have to get ready for the reality. The bottom line is that it's a difficult market right now."

McHenry said the company expects to know soon, probably later this week, "what positions we had were aligned for the goals of the company going forward. By the beginning of

February, we'll be completely restaffed."

Employees whose jobs will be eliminated will have an opportunity to apply for another job within the company, she said. "People will have the month of January to seek other opportunities where they might fit."

Several management changes already have taken place. On December 14 the company announced that Charles Zebula, currently treasurer and senior vice president for investor relations, will become executive vice president for energy supply, a newly created position. Julie Sloat, currently vice president for regulatory case management, will become treasurer and senior vice president.

Altogether, AEP owns about 38,000 MW of generating capacity, nearly 25,000 MW of which is coal-fired.

— *Bob Matyi*

North Carolina lawmakers may ... *from page 1*

ers because it requires utilities to generate or buy premium-price solar and other renewable energy. S.B. 3 "picks winners and losers" among generation types, he said.

"Where do you stop? ... We want to create a level playing field" so utilities can select the lowest-cost, most reliable power sources without a government mandate, Hager said. He said that the capacity factor of solar facilities in North Carolina is about 16%, and that solar energy costs several times as much traditional, around-the-clock sources like coal-fired power.

Hager said that by freezing the requirements of S.B. 3 at their current level — rather than ramping them up to 6% in 2015, 10% in 2018, and, for investor-owned utilities but not municipal utilities or electric cooperatives, 12.5% in 2021 — utilities, co-ops and renewables developers could maintain and honor existing power purchase agreements without entering into new ones.

Hager said he is optimistic that the North Carolina Senate, where Republicans will hold a 33-17 advantage over Democrats, also will back the RPS-freeze bill.

Asked for comment, Brandon Greife, spokesman for Senator Phil Berger, Republican and the Senate's president pro tempore, said "Unfortunately, since it is the holidays I've been unable to speak with any members of Senate leadership about Representative Hager's bill or their view on renewables mandates."

Steve Kalland, executive director of the North Carolina Solar Center, said that legislators who "would like to monkey with [S.B. 3] are tied to the American Legislative Exchange Council," a group that has been pressing for state legislative changes aimed at a more "free-market" and "limited-government" approach to energy and other industries.

Despite Hager's optimism, Kalland said, "I don't think that [the RPS-freeze effort] will have a lot of legs [in North Carolina] ... My expectation is that the whole thing will be much ado about nothing."

Asked whether the bill he envisions is based upon model anti-RPS legislation advanced by ALEC, Hager said that he has

not seen ALEC's measure so he is "not sure of any commonality ... What I know is that the idea of subsidies is not something that sits well with most Republicans and most conservatives."

Spokesmen for ALEC did not respond to a request for comment, but according to the Washington-based group's website, ALEC said that its stance on renewable energy has been "very clear. ALEC believes that free markets in energy produce more options, more energy, lower prices and less economic disruptions. Also, ALEC believes that mandates to transform the energy sector and use renewable energy sources place the government in the unfair position of choosing winners and losers, keeping alive industries that are dependent on special interest lobbying."

ALEC noted that it "fully supports voluntary efforts to expand and advance renewable energy and does not discourage the marketing of 'green' power and 'green' pricing such that willing buyers and sellers of renewable energy sources are free to negotiate the terms and conditions of such sales, and no technology or class of technologies is given an unfair competitive advantage."

Asked where Duke Energy, corporate parent of Duke Energy Carolinas and Progress Energy Carolinas, stands on the matter, Duke spokesman Jason Walls said, "There are a lot of rumors right now about possible legislation, but we can't speculate until we see an actual bill." Walls noted that, in general, Duke does not like the idea of revisiting carefully crafted legislation like S.B. 3 so soon after its enactment.

North Carolina is not the only state where conservative Republican legislators, bolstered by election gains in November, are planning efforts to freeze or roll back their state's RPS.

In Kansas, Republicans in the tea party wing plan a 2013 assault on the state's 2009 RPS, which calls for 10% of utility generating capacity to be renewable in the 2011-15 period, rising to 15% in the 2016-19 period, and 20% in 2020 and beyond.

— *Housley Carr*

J.P. Morgan preparing to monetize ... *from page 1*

nor what percentage will be transferred to Threshold. J.P. Morgan will retain a stake in the wind farms.

Threshold Power Trust is 44% owned by an affiliate of NGEN Partners, 22% by Susan Nickey, 13% by Elizabeth Young, about 9% by Martin Crotty, about 6% by Persimmon Tree Capital Fund, which is owned by Alexis Sant and Jason Hicks, and about 6% is owned by Roger Sant, co-founder and chairman emeritus of AES.

Nickey and Crotty are also CEO and COO, respectively, of Threshold Power, based in Chicago.

On its website, Threshold Power says its strategy is to acquire interests in operating renewable and clean energy projects that use proven technologies with an initial focus on acquiring interests in wind power assets that have "predictable revenues, dependable cash flows and solid operating performance, without the development risk."

Threshold Power Trust could come to market in Ontario as

early as mid-January. It is unclear from the filing, but the funds raised in the offering could be used to repay investments in Threshold Power or could be channeled to J.P. Morgan.

The power trust structure, if successful, could represent the attainment of a long sought goal that bankers and developers have been seeking for renewable energy assets. Being able to fund renewable energy projects using publicly traded financial instruments could broaden the investor base for those assets and help to lower capital costs, stakeholders say.

The attraction of a Canadian income trust is that it passes distributions to investors at a low tax rate and higher yields than many other investments. However, in 2010 the Canadian government closed income trusts for Canadian assets, but foreign assets still qualify. Some are calling income trusts for foreign assets foreign asset income trusts or FAITs.

J.P. Morgan has tried in the past to bundle renewable assets and float them in a public vehicle, but the investors had difficulty raising the required capital, according to a lawyer familiar with the process who requested anonymity.

It also was not clear from the filing how large the public offering might be, but based on the capacity of the assets, it could be as large as \$500 million.

It is not clear if Threshold Power needs to raise capital for its investment.

Multiple calls to J.P. Morgan and Threshold Power were not returned by press time.

The project companies that are being transferred are Blue Canyon Windpower, a 74.25-MW facility in Comanche and Caddo Counties, Oklahoma; Caprock Wind, an approximately 80-MW wind station in Quay County, New Mexico; Cedar Creek Wind Energy, an approximately 300-MW wind farm in Colorado; Crescent Ridge which owns and operates a 54.45-MW wind plant in Bureau County, Illinois; Jersey-Atlantic Wind, owner of a 7.5-MW wind farm in Atlantic County, New Jersey, and Wind Park Bear Creek, a 24-MW wind farm in Luzerne County, Pennsylvania.

The wind farms all entered service between 2005 and 2007.

— Peter Maloney

California IOUs hold 194 PPAs ... from page 1

PG&E is being supplied by 38 facilities with combined capacity of 2,085 MW, SoCal Edison has 35 with 2,928 MW, and SDG&E has 23 long-term supply deals with renewable facilities that can generate 880 MW of power.

According to the CPUC data, of the 98 approved PPAs for projects still under construction but due to come online between now and the end of 2015, SoCal Edison has 43 approved contracts with facilities with combined capacity of 3,099 MW, while PG&E has 33 with combined capacity of 5,133 MW, and SDG&E has 23 with 1,887 MW.

When broken down by types of renewables currently supplying each IOU, wind generation is most prominent.

PG&E has 15 wind projects with 1,118 MW of capacity, eight biomass with 185 MW, six utility-scale solar photovoltaic facilities with 108 MW of capacity, three small hydropower facilities with 30 MW, and two biogas with 4 MW.

SoCal Edison has 16 wind PPAs for 2,210 MW. It has six biogas with 27 MW, five geothermal with 597 MW, five small hydro with 52 MW, one solar PV facility with 21 MW, one solar thermal facility with 26 MW and one biomass facility with 16 MW of capacity.

SDG&E, according to the CPUC data, has 10 wind PPAs with 644 MW of capacity, seven biogas with 39 MW, three biomass with 60 MW, two facilities listed as "various" with 132 MW, and one 5 MW small hydro.

Approved contracts for facilities in development are dominated by solar facilities.

PG&E has approved PPAs for 18 solar PV facilities that will have, once completed, 2,438 MW of capacity, and it has five PPAs for concentrating solar thermal facilities that will have 1,898 MW of capacity.

Additionally, PG&E has PPAs for five more wind facilities that will provide 713 MW of capacity, three biomass facilities with 56 MW of capacity and two biogas with 28 MW.

SoCal Edison has contracts for 18 utility-scale solar PV facilities with 1,961 MW of capacity and one concentrating solar thermal facility for 117 MW.

According to the CPUC data, SoCal Edison has contracts for 15 "ground-mounts," which are local distributed solar PV facilities typically under 20 MW. Developers will supply 199 MW of such power to the IOU.

Also, SoCal Edison has contracts with six wind farms for 674 MW of supply and three geothermal facilities for 148 MW.

SDG&E has 15 approved PPAs for 1,073 MW of solar PV, one for 49 MW of concentrating solar thermal and four wind PPAs for 765 MW.

— Jeffrey Ryser

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