

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

RE Barren Ridge 1 LLC

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Docket No. EG15- -000

**RE BARREN RIDGE 1 LLC  
NOTICE OF SELF-CERTIFICATION OF  
EXEMPT WHOLESALE GENERATOR STATUS**

Pursuant to the Public Utility Holding Company Act of 2005 (“PUHCA 2005”)<sup>1</sup> and Section 366.7 of the Federal Energy Regulatory Commission’s (“Commission”) regulations<sup>2</sup>, RE Barren Ridge 1 LLC (“Barren Ridge”) hereby submits this Notice of Self-Certification of Exempt Wholesale Generator (“EWG”) Status (“Notice”) with respect to its ownership and operation of an approximately 60 MW solar photovoltaic generation facility and related assets located in Kern County, California (“Facility”), which is within the Los Angeles Department of Water and Power (“LADWP”) balancing authority area.

**I. COMMUNICATIONS**

All correspondence and communications regarding this proceeding should be addressed and directed to the following persons:

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<sup>1</sup> Pub. L. No. 109-58, §§ 1261-1277, 119 Stat. 594, 972-78 (2005).

<sup>2</sup> 18 C.F.R. § 366.7

(\* ) Persons denoted with an asterisk are designated for service and should be included on the official service list in this proceeding. Barren Ridge requests waiver of Rule 203(b)(3)<sup>3</sup> so that a copy of any communications in the proceeding referenced above may be served on all persons listed above.

## **II. DESCRIPTION OF BARREN RIDGE**

Barren Ridge is a Delaware limited liability company that owns and operates the Facility. Barren Ridge anticipates that the Facility will commence commercial operation by 12/31/15. The Facility will be interconnected to the distribution system owned by the Southern California Edison Company (“SCE”) and all of the output from the Facility will be sold exclusively at wholesale pursuant to a 20-year power purchase agreement with The City of Los Angeles acting by and through the Department of Water and Power.

Barren Ridge is wholly owned by Recurrent Energy Development Holdings, LLC, whose membership interests are, in turn, wholly owned by Recurrent Energy, LLC (“Recurrent”), all of which are Delaware limited liability companies. Recurrent’s principal place of business is in San Francisco, California.

## **III. REPRESENTATIONS**

Pursuant to Sections 366.1 and 366.7 of the Commission’s regulations,<sup>4</sup> Barren Ridge represents that it satisfies the requirements for EWG status, as follows:

1. Barren Ridge is a Delaware limited liability company that will own and operate the Facility.

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<sup>3</sup> 18 C.F.R. § 385.203(b)(3) (2013).

<sup>4</sup> 18 C.F.R. §§ 366.1, 366.7.

2. Barren Ridge engages exclusively in the business of owning and operating the Facility and selling electric energy at wholesale.

3. Barren Ridge will not make foreign retail sales of electric energy from the Facility.

4. The Facility is an eligible facility as defined in Section 32(a)(2) of the Public Utility Holding Company Act of 1935, which is incorporated by reference in Section 1262(6) of PUHCA 2005,<sup>5</sup> and Section 366.1 of the Commission's regulations<sup>6</sup>.

5. The electricity produced by the Facility will be sold exclusively at wholesale.

6. The Facility consists of a 60 MW solar photovoltaic generating facility, and will use a substation, switchyard, and other equipment necessary to interconnect the Facility to the transmission grid.

7. The interconnection facilities that are associated with the Facility serve only to connect the project to LADWP's transmission system for purposes of delivering energy and capacity to the LADWP controlled grid. Those facilities, therefore, qualify as "interconnecting transmission facilities necessary to effect a sale of electric energy at wholesale" and are included as part of Barren Ridge's eligible facility.<sup>7</sup>

8. No portion of the Facility is owned or operated by an electric utility company that is an affiliate or an associate company of Barren Ridge (other than an electric utility company that is an EWG),<sup>8</sup> as those terms are defined in Section 366.1 of the Commission's regulations.

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<sup>5</sup> 42 U.S.C. § 16451(6) (2006).

<sup>6</sup> 18 C.F.R. § 366.1

<sup>7</sup> 15 U.S.C. § 79z-5a(a)(2) (repealed).

<sup>8</sup> The Commission has determined that partial ownership of interconnection facilities by multiple EWGs does not affect their respective EWG status. *See, e.g., Buffalo Gap Wind Farm 2, LLC*, 118 FERC ¶ 61,069 (2007); *Sagebrush, et al.*, 103 FERC ¶ 61,332 (2003).

9. No rate or charge for, or in connection with, the construction of the Facility, or for the electric energy produced by the Facility, was in effect under the laws of any state on October 24, 1992. As such, no determination or certification by any state commission is necessary prior to certification of Barren Ridge as an EWG.

10. Concurrently with the filing of this Notice with the Commission, Barren Ridge is filing a copy of this Notice with the California Public Utilities Commission, which is the state regulatory authority of the state in which the Facility will be located.

#### IV. CONCLUSION

Based on the foregoing facts and representations, Barren Ridge requests that the Commission accept this notice of self-certification and grant Barren Ridge status as an EWG.

Respectfully submitted,

/s/ Brian Biering  
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