



RCEA FEED-IN TARIFF Q&A

1. Would RCEA purchase energy without the Renewable Energy Certificates (RECs)?

No, RCEA requires FIT projects to provide RECs bundled with the energy.

2. Can FIT projects pursue full capacity deliverability status (FCDS) after their commercial operation date (COD) and what happens if the project eventually does not get FCDS awarded?

RCEA prefers that projects seek FCDS in their interconnection process, but in the case that is infeasible or unsuccessful, the PPA allows for extension of the RA Guarantee Date up to one year beyond COD without penalty due to FCDS delay, during which the Seller can complete its deliverability study. If the project doesn't achieve FCDS during this extension, penalties will start incurring at the [CPM Soft Offer Cap](#) rate for another year. After that, penalties will cease, and the PPA Capacity Rate will be reduced to \$0.00 kW-month unless and until the project does achieve FCDS.

3. What does RCEA mean by “initial interconnection study results” that are required to apply for the FIT Program?

RCEA requires that projects have at least an initial estimate of their interconnection costs at the time of application to prevent against early contract termination in the case that costs come in much higher than expected. The following are acceptable interconnection study milestones depending on the interconnection process under PG&E's Wholesale Distribution Access Tariff (WDAT).

WDAT Interconnection Process	Study Report
Fast Track	Initial Review
Independent Study	System Impact
Cluster Study	Phase I

4. How do RCEA's FIT projects participate in the CAISO market and who gets the market revenue? Does this impact payments to the project under the FIT PPA?

1-5 MW projects will be scheduled, dispatched and settled in the CAISO market, and RCEA will receive the market revenues. <1 MW projects will not be scheduled and simply reduce RCEA's day-ahead load schedule. CAISO market participation does not affect payments to the project by RCEA under the FIT PPA, except for excess generation during negative pricing hours as detailed in the Exhibit C. Also note that the project still gets paid if RCEA



curtains generation for economic reasons, per the Buyer Curtailment provisions.

5. What is the boundary of the Humboldt Local Capacity Area that defines eligible projects?

The Humboldt LCA is the electrical proxy of RCEA’s service territory and how we define the boundary for local power projects. It is inclusive of all of Humboldt County, plus a small sliver of western Trinity County. A project is considered eligible for RCEA’s FIT Program if it is interconnecting to any substation in the Humboldt LCA, which is defined in CAISO’s [2024 Local Capacity Technical Report](#) as follows:

3.3.1 Humboldt Area

3.3.1.1 Area Definition

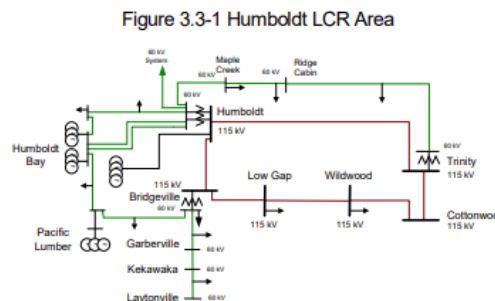
The transmission tie lines into the area include:

- Bridgeville-Cottonwood 115 kV line #1
- Humboldt-Trinity 115 kV line #1
- Laytonville-Garberville 60 kV line #1
- Trinity-Maple Creek 60 kV line #1

The substations that delineate the Humboldt Area are:

- Bridgeville is in, Low Gap, Wildwood and Cottonwood are out
- Humboldt is in, Trinity is out
- Kekawaka and Garberville are in, Laytonville is out
- Maple Creek is in, Trinity and Ridge Cabin are out

Humboldt LCR Area Diagram



6. Do standalone storage projects qualify for RCEA’s FIT Program?

No, only generation plus storage or standalone generation qualifies for the FIT Program. RCEA will also accept storage that is virtually/contractually paired with generation (see next question).

7. Would RCEA consider solar and storage projects that are not co-located?

Yes, RCEA’s FIT can accommodate generation and storage projects with different points of interconnection if both facilities are 1) located in the Humboldt Local Capacity Area, 2) submitted in the same application, and 3) contracted under the same PPA as virtually paired resources. RCEA is in process of modifying our FIT PPA and Application to accommodate this configuration, which we expect to complete by January 1, 2025. The modifications will address how virtually paired resources will be compensated for energy products delivered at the different points of interconnection.