Frequently Asked Questions PG&E BioMAT Feed-in Tariff Program

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1. THE BASICS

What is the BioMAT FIT Program?

BioMAT, or the Bioenergy Market Adjusting Tariff, is a renewable energy feed-in tariff (FIT) established by California Public Utilities Commission (CPUC) Decisions (D.) 14-12-081 and (D.) 15-09-004 to implement Senate Bill (SB) 1122. BioMAT offers 10, 15 or 20-year power purchase agreements (PPAs) to purchase wholesale power generated from small renewable bioenergy projects with nameplates up to 5 MW, provided that not more than 3 MW is delivered to the grid at any time. Details on the program are posted here: www.pge.com/rfo/biomat. For pricing information, see this FAQ's section on "Price and Payment".

How many megawatts are available under the BioMAT program?

Available capacity (along with current pricing) are available on <u>PG&E's BioMAT</u> online platform.

Can I see a list of projects that have been awarded a PPA?

Yes. PG&E posts a list of executed PPAs within 10 business days of execution. Currently, this report is posted on the <u>PG&E's BioMAT online platform</u> hosted by Accion Power under the <u>Program Documents</u> tab.

Where can I find information on the BioMAT queues?

The three investor-owned utilities (IOUs) post BioMAT queue information based on the Statewide Pricing Category Queues. See FAQ's section on "Price and Payment". Depending on the "market depth" (i.e. the number of unaffiliated applicants in the applicable Statewide Pricing Queue) and number of projects in the Statewide Pricing Queue, the IOUs may or may not disclose queue information. See Queue Disclosure Policy and Queue Information reports on <u>PG&E's BioMAT online platform</u> under the <u>Program Documents</u> tab.

I have a property upon which I would like to develop a bioenergy project to sell power to PG&E. Would PG&E be interested in installing a project on my property or be willing to recommend a developer to install it?

No. Under BioMAT, PG&E purchases power from a third-party that owns/operates a renewable energy facility. PG&E does not develop projects under BioMAT and does not recommend developers/business partners to others.

2. ELIGIBILITY

For detailed information on BioMAT eligibility: See the E-BioMAT Tariff and slides 12-13 of the <u>BioMAT Webinar Presentation</u> on the BioMAT webpage: <u>www.pge.com/rfo/biomat</u>. An audio file for the presentation is also posted.

A. <u>FUEL</u>

How do I know which Category my proposed project qualifies for?

You can find the Category definitions in the Definitions section of the E-BioMAT tariff. If you still have questions, please contact PG&E at <u>feed-intariffs@pge.com</u>.

Can I use any feedstock/fuels that are not described in the Fuel Resource Category definition I am applying for?

It depends. Category 2 (Dairy) must use 100% of its feedstock from dairy digester gas. All other Categories may utilize up to 20% of their feedstock from another qualifying BioMAT Category.

Can I use a small amount of non-renewable fuels as normally allowed by the California Energy Commission?

No. See above.

Can I switch Fuel Resource Categories for my project after I receive a queue number?

No, not without withdrawing your PPR from the queue and reapplying.

Is landfill gas eligible for BioMAT?

No. On page 10 of <u>Decision 14-12-081</u>, the CPUC explicitly states that while landfill gas is deemed an Eligible Renewable Resource by the California Energy Commission, it is not eligible for BioMAT. Please see the excerpt below:

"A significant reason that an RPS-eligible facility using biogas generation may not be eligible to participate in the bioenergy FiT under SB 1122 is that the feedstock used is not one of the four listed in SB 1122 for the biogas category: wastewater treatment, municipal organic waste diversion, food processing, and codigestion. An example is landfill gas. This source is included in the language of our "biogas" definition for purposes of implementing SB 1122; it is considered to be RPS-eligible by the CEC; but it is not eligible for the bioenergy FiT because it is not on the list of resources set out in SB 1122 for the biogas category."

B. INTERCONNECTION

Can I apply to BioMAT without a valid interconnection study?

No, unless the project is a Category 3 (sustainable forest biomass project) per CPUC Decision 16-10-025 (See Section 5.2(b) of the BioMAT Tariff). For Category 1 and Category 2 projects, interconnection studies must correspond to an active status in the public distribution interconnection queue managed by Electric Generation Interconnection. All projects must promptly notify PG&E if the project no longer meets the eligibility requirements for the BioMAT program (See Section 5.2(h) of the BioMAT Tariff).

My project has not met the eligibility criteria for interconnection yet, but will soon. Can I apply now and submit interconnection documentation later, when my project becomes eligible?

No. An Applicant must have an interconnection study as outlined in the Eligibility section of the E-BioMAT Tariff to apply for BioMAT. This pertains to all project categories. Further, with the exception of Category 3 projects, the study must correspond to an "active" status in PG&E's <u>public interconnection queue</u>. If these eligibility criteria cannot be met with interconnection documentation dated on or before the PPR submission date, the PPR will be rejected. An Applicant can submit a new PPR for a project that has been rejected once the eligibility criteria are met.

C. <u>SIZING</u>

Can I have a 5 MW project and export only 3 MW to qualify for BioMAT?

Yes, Assembly Bill 1923 has been implemented which allows a project nameplate up to 5 MW, provided that no more than 3 MW is delivered to the grid at any time.

If I have two separate meters, can I break up my 6 MW project into two parts and secure two PPAs?

No. That would violate the Daisy Chaining provision in the E-BioMAT Tariff. The project being considered must be the only exporting project by the Applicant or Applicant affiliates on any single or contiguous pieces of property. This does not preclude co-located net energy metering (NEM) projects. PG&E considers allowances for co-located projects of a different technology (e.g. solar PV).

D. INCENTIVES

I have a generator currently under a net energy metering (NEM) agreement. Can this generator participate in BioMAT?

Yes. You may apply for BioMAT but must terminate your NEM agreement for the project prior to achieving Commercial Operation under the BioMAT PPA. Keep in mind the requirement that the project must commence operations on or after June 1, 2013 per Section 4.13 of the BioMAT Tariff.

My project has received Self Generation Incentive Program (SGIP) funds. Can the project participate in BioMAT?

It depends. A project is ineligible for the E-BioMAT tariff if the generator has received SGIP incentives in the past 10 years. However, PG&E will accept projects that are sourcing biogas from a digester that is also providing gas to an SGIP-funded generator.

E. COMMERCIAL OPERATION DATE

Can I repower an existing facility to qualify for BioMAT given the requirement to commence operations on or after June 1, 2013 per Section 4.14 of the BioMAT Tariff?

Yes, provided it meets the requirements for repowering a facility under the California Energy Commission's RPS Eligibility Guidebook. Repowered facilities can secure a new commercial operations date.

3. HOW TO APPLY

Where can I find an application?

The BioMAT application is called a Program Participation Request (PPR) and can be submitted through <u>PG&E's BioMAT online platform</u>. A PPR includes a PPR form, supporting documentation, and a non-refundable PPR fee.

When can I apply?

PPRs can be submitted at any time while the BioMAT program is open. PG&E began accepting PPRs on December 1, 2015.

Do I need to pay a fee? If so, how do I pay it? Is it refundable?

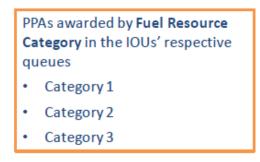
Yes. There is a fee of \$2/kW to submit a BioMAT PPR, which can be can be paid by check or wire transfer. More detailed instructions regarding payment will be communicated upon PPR submittal. The fee is not refundable. In addition, Category 3 projects with an inactive interconnection study submit a deposit as described in Section 5.2 (b) of the BioMAT Tariff.

What happens after I apply?

If the PPR is deemed complete, a BioMAT Queue Number will be assigned based on the project's Fuel Resource Category and the time of the initial submission, provided it contained only minor deficiencies. If the PPR is incomplete, PG&E may allow the applicant to cure minor deficiencies within 10 business days of being notified of the deficiencies.

How soon can I get a PPA?

Six (6) megawatts of PPA capacity are made available in each Fuel Resource Category each bi-monthly Program Period. Applicants are awarded a PPA based on their acceptance of the posted price for the project and on the project's BioMAT Queue Number. The amount of time that it may take for a project to secure a PPA will depend on the price competiveness of projects within a Statewide Pricing Queue (i.e. the cumulative queue by the Statewide Pricing Category from each of the three investor-owned utilities or "IOUs") and a project's BioMAT queue number in PG&E's Fuel Resource Category Queue. See the Subscription section of the E-BioMAT Tariff and slides 18 and 19 of the <u>BioMAT Webinar Presentation</u>.



How long will the E-BioMAT Tariff be available?

The E-BioMAT Tariff makes up to 6 MW available per Product Type for each bimonthly Program Period. BioMAT will open for up to \sim 60 months. See "Final Period" of the E-BioMAT Tariff.

4. PRICE AND PAYMENT

What is the contract price?

While PPAs are awarded by BioMAT Queue Number in the applicable Fuel Resource Category with PG&E, the Contract Price is determined by a market adjusting mechanism applied to the Statewide Pricing Queue (i.e. the cumulative queue by the Statewide Pricing Category from each of the three investor-owned utilities or "IOUs"). During the first Program Period (Program Period 1), which commenced on February 1, 2016, the Contract Price offered in each Statewide Pricing Category is \$127.72/MWh. Every bi-monthly Program Period ("auction") thereafter, the available price has the potential to adjust independently among the Statewide Pricing Categories.



How is the available price calculated?

The price in each subsequent bi-monthly Program Period may adjust independently for each Statewide Pricing Category based on the Statewide Subscription for that Statewide Pricing Category (i.e. the queue's total MW acceptance of the price offered in the previous Program Period). Prices cannot adjust if the "market depth" requirements are not met (i.e. there must be at least 3 or 5 unaffiliated applicants in the queue).

Statewide Subscription Rate (%)	=	Statewide Subscription (MW)
(,		The lesser of (i) Statewide Available Allocation (MW) or (ii) the total capacity (MW) in the Statewide Pricing Queue

Price Adjustment Thresholds	Price Adjustment
< 20%	Price Increases
≥ 20% and < 100%	No Price Adjustment
≥100%	Price Decreases

For further details on pricing, see the Section 8 (Pricing) and Section 14 (Definitions) of the E-BioMAT Tariff and pages 20-23 of the <u>BioMAT Webinar</u> <u>Presentation.</u> The IOUs also filed a "Joint IOU Statewide Pooled Pricing Administration" document, which further illustrates BioMAT pricing. You can find this on <u>PG&E's BioMAT online platform</u> hosted by Accion Power under the <u>Program</u> <u>Documents</u> tab)

Where can I find the current contract price being offered?

Prior to each Program Period, PG&E will post the Contract Price to be offered during that Program Period on <u>PG&E's BioMAT online platform</u> hosted by Accion Power on the home page.

Does the contract price escalate to account for inflation?

No. The price is fixed over the Delivery Term of the PPA. Applicants must account for inflation when accepting a Contract Price.

Does the price vary depending on the Delivery Term?

No. The Contract Price offered applies to all Delivery Terms (10, 15 or 20 years).

Are there Time of Delivery factors?

Yes. The current version of the BioMAT PPA contains a set of time of delivery payment allocation factors ("TOD factors"). See Appendix C of the BioMAT PPA for more details.

Why are the Energy-Only and Full Capacity Deliverability Payment Allocation Factors the same?

Prior to PG&E's advice letter filing on January 22, 2016, the payment allocation factors were different. However, pursuant to PG&E's CPUC-approved 2015 Renewable Portfolio Standard Plan, capacity has become significantly less valuable and so PG&E has simplified its PPAs to include only a single set of TOD factors to be applied to both energy-only and fully deliverable resources.

How often are payments made under the PPA?

PG&E pays Sellers on a monthly basis. See Section 2.7 of the BioMAT PPA.

5. INTERCONNECTION PROCESS

How do I interconnect to PG&E's grid?

Assembly Bill 1923 has been implemented which allows projects to interconnect to PG&E's distribution or transmission system. Applicants must apply for interconnection with PG&E's Electric Generation Interconnection (EGI) department or with the CA Independent System Operator (CAISO) as described in Section 4.6 of the BioMAT Tariff. Please see the following webpages for interconnection and contact information:

https://www.pge.com/en US/for-our-business-partners/interconnectionrenewables/export-power/export-power.page?ctx=large-business

http://www.caiso.com/planning/Pages/Generatorinterconnection/Default.aspx

Can PG&E provide guidance on the best locations for interconnection?

Projects must be located in PG&E's electric service territory and interconnected to PG&E's distribution or transmission system. PG&E's EGI Department provides a map with distribution system information that project developers may find useful in evaluating project sites (<u>PVRAM Map</u>).

What is the difference between PG&E's distribution and transmission systems?

PG&E's distribution system voltage is less than 60 kV, while PG&E's transmission system operates at higher voltages and is controlled by the California Independent System Operator (CAISO).

What is the difference between Rule 21 and the Wholesale Distribution Tariff (WDT)?

Rule 21 is a CPUC-jurisdictional interconnection process that is available to "PURPA" PPAs, selling energy to PG&E. The Wholesale Distribution Tariff (WDT) is a FERCjurisdictional interconnection process for projects on the distribution system (no "PURPA" PPA requirement and no requirement to sell to PG&E). BioMAT applicants may choose to interconnect under either Rule 21 or WDT. See PG&E's Electric Generation Interconnection webpage for more details:

http://www.pge.com/en/b2b/newgenerator/fasttrack/index.page.

6. OTHER PPA TERMS

Can I serve onsite load and export the remaining energy to PG&E?

Yes. A project may serve "Site Host Load" and export remaining energy to PG&E under an "Excess Sale" transaction as per the terms in the BioMAT PPA. Notwithstanding an exception for "Site Host Load", you may not sell any "Product" from the Facility to a third party. See the definitions of Site Host Load and Product in Appendix A of the BioMAT PPA.

Can I sign a PPA with a 25-year delivery term?

No. BioMAT only allows for 10, 15, or 20-year delivery terms.

Do I get to keep the renewable energy credits (RECs)?

No. RECs are part of the "Product" purchased by PG&E under the terms of the BioMAT PPA.

Do I need to get a CAISO meter?

Projects sized 500 kW (AC) or greater must obtain a CAISO meter and be in compliance with the CAISO Tariff as a Participating Generator Agreement (PGA). See Section 5.1 of the BioMAT PPA as well as the latest CAISO Tariff.

Does the project need to obtain Full Capacity Deliverability Status (FCDS)?

No. BioMAT Sellers have the option, but not the obligation, to secure Full Capacity Deliverability Status. See Section 3.4.3 of the BioMAT PPA. However, pursuant to Section 3.4.4 of the BioMAT PPA, seller shall cooperate in good faith with, and comply with unburdensome requests of, Buyer and the CAISO to enable Buyer and/or the CAISO to assign Capacity Attributes and Resource Adequacy Benefits to the Facility.

What other contractual obligations are there?

We encourage all interested parties to review the PPA closely to understand the entirety of seller obligations, but some key requirements include: performance (MWh delivery) obligations outlined under Guaranteed Energy Production (Section 11); Fuel Resource Requirements (Section 4.4.2); forecasting requirements for the expected generation output (Appendix D); insurance requirements (Section 9), collateral requirements (Section 12); and the requirements to achieve and maintain status as an Eligible Renewable Resource with the California Energy Commission, and the transfer of all RECs to PG&E.