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ABENGOA SOLAR

Arizona Solar One LLC

1250 Simms Street, Unit 101
Lakewood, CO. 80401

Phone: 303-928-8500
Fax: 303-233-2738



ORIGINAL

Docket No. L-00000GG-08-0407-00139, Decision No. 70638
Docket No. L-00000GG-08-0408-00140, Decision No. 70639

Solana Generating Facility

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Compliance Section
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Arizona Corporation Commission
DOCKETED

FEB 11 2015

DOCKETED BY

February 10, 2015

ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

FEB 11 A 9:57

RECEIVED

Re: Docket No. L-00000GG-08-0407-00139, Decision No. 70638
Docket No. L-00000GG-08-0408-00140, Decision No. 70639

This letter is in response to your courtesy letter, dated December 04, 2014, in which you provide Arizona Solar One LLC notice of certain compliance actions ordered by the Arizona Corporation Commission (Commission) that will become due in the near future. In the same notice, you attached a Compliance Notice that describes certain compliance actions that will require from us to file documents by certain due dates and/or time schedules.

In this sense, Arizona Solar One LLC would like to clarify that it has never been its intention to unilaterally stop submitting the annual self-report to the Arizona Corporation Commission, the Arizona Attorney General and the Department of Commerce Energy Office, as both the CEC Condition No. 20 (Decision 70638) and Condition No. 17 (Decision 70639) state. On the contrary, it was a decision based on the literal interpretation of both conditions, which state:

"The Applicant, or its assignee(s), shall submit a self-certification letter annually, identifying progress made with respect to each condition contained in the Certificate, including which conditions have been met. Copies of each letter along with the corresponding documentation shall be submitted to the Arizona Attorney General and Department of Commerce Energy Office. The requirement for the self-certification shall expire on the date the Project is placed into operation."
[Intentionally highlighted by the subscriber]

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Docket No. L-00000GG-08-0407-00139, Decision No. 70638
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On November 25, 2013 Arizona Solar One LLC submitted to the Docket Control and Compliance Section of the Arizona Corporation Commission, the Governor's Office of Energy Policy, and the Arizona Attorney General its 2013 annual self-certification, which indicates that the "Solana Generating Station" entered into operation in October 8, 2013.

It is our understanding that by entering Solana Generating Station into operation triggered the expiration of the requirement for the annual self-certification, being, then, the 2013 annual self-certification the last certification Arizona Solar One submitted to the honorable entities aforementioned.

However, if the Arizona Corporation Commission considers that our interpretation is not accurate, please advise us at your earliest convenience, that we would gladly resume the annual self-certification, starting with the year 2014.

In addition, in your same courtesy letter of December 04, 2014, you notified to Arizona Solar One LLC that the "Decision may also contain provisions that require compliance, although there are no compliance dates or time schedules."

Arizona Solar One LLC hereby recognizes these conditions, and is working diligently along with Abengoa corporate headquarters to fulfill some of them, in particular the Conditions dedicated to Educational Programs. We believe that by the end of this month we will submit to the Arizona Corporation Commission, the Arizona Attorney General and the Department of Commerce Energy Office our Educational Program for the years to come.

Please accept our apologies for the inconvenience, and consider us your true friends.

Sincerely,

A handwritten signature in black ink, appearing to read "Emiliano Garcia Sanz".

Emiliano Garcia Sanz
Solana – General Director
Arizona Solar One LLC - Treasurer

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Docket No. L-00000GG-08-0407-00139, Decision No. 70638
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Solana Generating Facility

February 10, 2015

Leisa Brug
Governor's Office of Energy Policy
1700 West Washington, Suite 220
Phoenix, Arizona 85007

Mark Brnovich
Arizona Attorney General
1275 West Washington
Phoenix, Arizona 85007

Re: Solana Generating Station – Arizona Solar One's Response to a courtesy letter from the Arizona Corporation Commission

Dear Ms. Brug and Mr. Brnovich,

On December 11, 2008, the Arizona Corporation Commission (ACC) granted a Certificate of Environmental Compatibility (CEC) for the Solana Generating Station. The Solana Generating Station as approved is a 280 megawatt (MW) gross output (250 MW nominal output) concentrating solar power (CSP) electric generating plant located on an approximately 3,100 acre site situated at Gila Bend, Arizona, at the northwest corner of Interstate 8 and Painted Rock Dam Road.

In response to a courtesy letter from the Arizona Corporation Commission, we would like to provide you with the following:

- A copy of Arizona Solar One LLC's response (Attachment 1) to a courtesy letter from the Arizona Corporation Utilities Division dated December 4, 2014, attached herewith (Attachment 2).

Sincerely,

A handwritten signature in black ink, appearing to read "Emiliano Garcia Sanz".

Emiliano Garcia Sanz
Solana – General Director
Arizona Solar One LLC - Treasurer

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Docket No. L-00000GG-08-0407-00139, Decision No. 70638
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Attachment 1

Arizona Solar One LLC's response to a courtesy letter from the Arizona Corporation
Utilities Division dated December 4, 2014

ABENGOA SOLAR

Arizona Solar One LLC

1250 Simms Street, Unit 101
Lakewood, CO. 80401

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Docket No. L-00000GG-08-0407-00139, Decision No. 70638
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Solana Generating Facility

February 10, 2015

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Compliance Section
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Re: Docket No. L-00000GG-08-0407-00139, Decision No. 70638
Docket No. L-00000GG-08-0408-00140, Decision No. 70639

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"The Applicant, or its assignee(s), shall submit a self-certification letter annually, identifying progress made with respect to each condition contained in the Certificate, including which conditions have been met. Copies of each letter along with the corresponding documentation shall be submitted to the Arizona Attorney General and Department of Commerce Energy Office. The requirement for the self-certification shall expire on the date the Project is placed into operation."
[Intentionally highlighted by the subscriber]

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Emiliano Garcia Sanz
Solana – General Director
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Docket No. L-00000GG-08-0407-00139, Decision No. 70638
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Attachment 2

Notice of Future Compliance from the Arizona Corporation Utilities Division

COMMISSIONERS
BOB STUMP - Chairman
GARY PIERCE
BRENDA BURNS
BOB BURNS
SUSAN BITTER SMITH



JODI JERICH
Executive Director

ARIZONA CORPORATION COMMISSION

**ARIZONA CORPORATION
UTILITIES DIVISION
1200 W. WASHINGTON STREET
PHOENIX, AZ 85007**

Notice of Future Compliance

December 3, 2014

Arizona Solar One, LLC
4505 E. Chandler Blvd. - #120
Phoenix, AZ 85048-0000

RE: DOCKET L-00000GG-08-0407-00139

DECISION NO: 70638

This is not a letter of delinquency. This letter is being sent to you as a courtesy to provide you with notice of certain compliance actions ordered by the Arizona Corporation Commission (Commission) that WILL become due in the near future. Attached is a Compliance Notice that describes certain compliance actions that will require you to file documents by certain due dates and/or time schedules. In addition to the included items, the Decision may also contain provisions that require compliance, but does not have compliance dates or time schedules. Please read the Decision carefully and comply with all of its provisions. Also included is a Compliance Filing Instruction sheet to assist you in filing documents appropriately.

If you have any questions, please contact Carmel Hood at (602) 542-0847 or Shannon Kanlan at (602) 542-0895 in the Compliance section.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian K. Bozzo".

Brian K. Bozzo
Manager, Compliance and Enforcement
Utilities Division

Enclosure/s

Future Compliance Due within 30 days: 12/3/2014

UTILITY: Arizona Solar One, LLC

DOCKET: L-00000GG-08-0407-00139 DECISION # 70638

RULE:

ACTION: Shall submit a SELF-CERTIFICATION LETTER annually, identifying progress made with respect to each condition contained in the Certificate, including which conditions have been met. Each letter shall be submitted to the Commission Docket Control on December 1, beginning 2009. Attached to each certification letter shall be documentation explaining how compliance with each condition was achieved. Copies of each letter along with the corresponding documentation shall be submitted to the Arizona Attorney General and Department of Commerce Energy Office. The requirement for the self-certification shall expire on the date the Project is placed into operation.

DUE: 12/1/2014

PERIOD: ANNUALLY

DOCKET: L-00000GG-08-0408-00140 DECISION # 70639

RULE:

ACTION: Shall submit a SELF-CERTIFICATION LETTER annually, identifying progress made with respect to each condition contained in the Certificate, including which conditions have been met. Each letter shall be submitted to the Commission Docket Control on December 1, beginning 2009. Attached to each certification letter shall be documentation explaining how compliance with each condition was achieved. Copies of each letter along with the corresponding documentation shall be submitted to the Arizona Attorney General and Department of Commerce Energy Office. The requirement for the self-certification shall expire on the date the Project is placed into operation.

DUE: 12/1/2014

PERIOD: ANNUALLY

AZCC COMPLIANCE FILING INSTRUCTIONS

Please read the ordering paragraphs of the Decision carefully and comply with all of its provisions.

When the Decision or the Compliance Notice requires the filing of documents with the Commission, or is silent as to where to file the documents, you MUST file an original and thirteen (13) copies of these documents with:

**Docket Control Center
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007**

Plus file one copy to:

**Compliance Section
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007**

Some Decisions may require you to file the documents with the Director of the Utilities Division, the Compliance Section or Staff. This can be accomplished by following the docketing instructions shown above, as both the Director and the Compliance section receive docketed filings (and the filing is then electronically filed by Docket Control). If the Company prefers to file the item directly with the individual party outlined in the decision, please file a copy of the documents with that individual party using the address shown below:

**Director of Utilities Division (or Compliance or Staff)
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007**

Plus file an original and thirteen (13) copies of the documents to Docket Control as listed above.

If for any reason you cannot comply by the time specified in the Commission's Decision, you may request an extension of time. This request must be made at least ninety (90) days prior to the due date for compliance in order to allow for consideration by the Commission. In your request, please outline the Decision Number with the page and line number of the compliance item for which you seek an extension of time. In addition, your request must clearly identify the compliance item, the original due date and the new due date that the Company is seeking. Finally, the request must describe, in detail, all of the individual reasons why the Company could not comply with the original Commission due date. Please be aware that the Company's reasons for requesting the extension of time will serve as the basis for Staff's recommendation as to whether the extension of time should be granted by the Commission. Address your request, with an original and thirteen (13) copies, to the Docket Control Center shown at the top of this page.

Please reference the Docket Number and Decision Number on all copies of Compliance Notices or Filings. Also, please refer to the Docket Control filing requirements at azcc.gov, for questions and/or additional information.