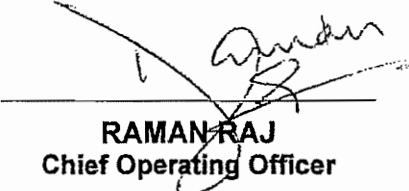
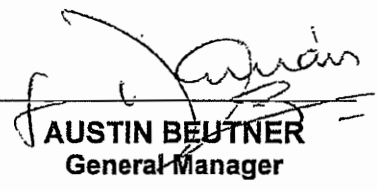
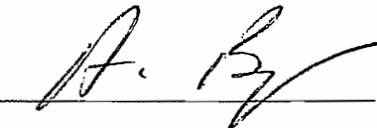



LADWP BOARD APPROVAL LETTER

TO: BOARD OF WATER AND POWER COMMISSIONERS		DATE: September 20, 2010
<div style="display: flex; justify-content: space-around;"><div style="text-align: center;"> RAMAN RAJ Chief Operating Officer</div><div style="text-align: center;"> AUSTIN BEUTNER General Manager</div></div> <div style="display: flex; justify-content: space-around; margin-top: 20px;"><div style="text-align: center;"> ARAM BENYAMIN Senior Assistant General Manager – Power System</div><div style="text-align: center;"> LORRAINE A. PASKETT Senior Assistant General Manager – Sustainability Programs and External Affairs</div></div>		SUBJECT: Los Angeles Department of Water and Power (LADWP) Solar Incentive Program (SIP) Modifications
		FOR COMMISSION OFFICE USE: RESOLUTION NO. _____
CITY COUNCIL APPROVAL REQUIRED: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	IF YES, BY WHICH CITY CHARTER SECTION:	

PURPOSE

Transmitted for approval by your Honorable Board is a Resolution, approved as to form and legality by the City Attorney, recommending approval of modifications to the current LADWP SIP Guidelines (Guidelines). The attached resolution also establishes the effective date of the modifications to be active for projects with applications received beginning November 1, 2010.

BACKGROUND

On June 6, 2000, the LADWP Board of Water and Power Commissioners (Board) adopted Resolution No. 000-288, establishing the LADWP Residential and Commercial Photovoltaic (PV) Buydown Incentive Program (Program). The Program commenced on September 1, 2000.

On July 25, 2006, the Board adopted Resolution No. 007-019, revising the Guidelines to implement an estimated performance-based incentive program. This revised Program commenced on August 15, 2006, and continued the Board's commitment to provide \$150 million to support solar PV projects through June 30, 2011.

On August 21, 2006, the Governor of California approved Senate Bill 1 (SB1). SB1 enacted the California Solar Initiative (CSI), declaring a State goal to install 3,000 megawatts (MW) of solar PV energy systems by 2017, to establish a self-sufficient solar industry in which solar PV energy systems are a viable mainstream

option for both homes and businesses in ten years, and to place solar PV energy systems on 50 percent of new homes in 13 years.

On September 4, 2007, the Board adopted Resolution No. 008 – 053, which modified the Guidelines to comply with the provisions of SB1. This modified Program commenced on October 1, 2007, and worked to extend the Board's commitment to provide \$313 million to support solar PV projects through December 31, 2016, with a goal of achieving 280 MW of solar PV systems.

On January 21, 2009, the board adopted Resolution No. 009-164, approving modifications retroactive to October 2007. The modifications allowed for more customer participation in the SIP by providing increased program flexibility for potential solar power users.

This Program is a component of LADWP's Renewable Portfolio Standard that was modified by the Board on April 17, 2007. LADWP has a goal to supply 20 percent of its retail energy by 2010 and 35 percent by 2020. Energy produced by 280 MW of customer-owned solar PV systems will equate to approximately 2 percent of LADWP's retail sales in 2016.

As of this date, the LADWP SIP has paid over \$100 million to customers for solar incentives. LADWP currently has 21.9 MW worth of customer installed solar capacity connected to the grid, generating 36,100,000 kilowatt-hours (kWh) a year. In 2009, the SIP received over 1,200 applications for solar incentives and facilitated the installation of 4.8 MW, proving that the Los Angeles solar industry is still growing through the economic downturn.

The SIP is on pace to receive approximately 1,800 solar incentive applications this year. Staff is seeing the amount of requested funds exceed the yearly \$33 million budgeted for the life of the program, proving that program is a success. Currently the SIP has 29 MW of pending applications in the incentive process. This amounts to \$89 million dollars of incentive payments which will be paid over the next three years. The program presently has a participation rate of requested dollars which doubles the annual budgeted amount.

The program has grown significantly over the last two years due to the increased Residential Federal Investment Tax Credit and lower solar material costs. In an effort to facilitate solar production among more Los Angeles residents, it is proposed that the incentive rates be modified to a level consistent with the State utilities. The proposed rates will allow for an additional 30 MW to be incentivized and will remain among the most lucrative in the state. At the present rate, staff is anticipating that with the proposed incentive rates all funds from the SIP will be exhausted in only 2 to 3 years.

The dollar per Watt (W) cost of a PV system is the highest of all the renewable technologies. As the funds for solar incentives are ratepayer funded, the California

Energy Commission (CEC) has issued a set of energy efficiency requirements to encourage efficiency measures that aid in reducing a home or business owner's net energy consumption. Efficiency measures are often less expensive to implement and reduce the need for a larger PV system. The Guidelines for California's Solar Electric Incentive Programs (SB1 Guidelines) issued by the CEC lays out a comprehensive set of requirements and standards with regards to commercial and residential energy efficiency. These measures differ for new and existing buildings and all owners wishing to receive solar incentive payments are now required to meet certain efficiency requirements. In response to these requirements, and in an effort to reach more customers and improve the SIP, a revision to the Guidelines is appropriate.

In 2007 and 2008, the SIP received an average of 40 incentive applications a month. In 2009, the SIP saw that number increase to approximately 100 applications a month. Presently, the SIP is receiving an average of 150 solar incentive applications a month. The current process requires staff to manually check the status. The new proposed process will provide transparency by allowing the applicant to check the status of his/her application online at any time and reduce this burden from staff. This will be conducted through PowerClerk, an online web tool that allows customers to complete, submit, and monitor their incentive applications over the internet. In addition to this change, staff also recommends modifications to the incentive formula and incentive rates to facilitate program consistency with other utilities and simplify the process.

Modifications

The following modifications to the Guidelines are hereby proposed:

1. Energy Efficiency Requirements

The SB1 Guidelines solar PV customers receiving incentive payments to meet certain energy efficiency requirements before they can receive an incentive payment. Different requirements are set for existing and newly constructed buildings, as well as residential and commercial customers.

Existing Buildings

The SB1 Guidelines require that all incentive applicants with existing buildings complete an energy efficiency audit to maximize their awareness of efficiency measures that could be taken to reduce their energy consumption. Efficiency investments can reduce the need for a large solar system, decreasing the net cost for solar customers. The results from these audits will allow building owners to see what efficiency measures can be taken and how much electricity savings they can achieve. Residential applicants will complete their audit on the web while commercial applicants will be required to contract a third party to conduct their audit.

In addition to the energy audit, the SB1 Guidelines requires commercial customers to perform a benchmarking evaluation on the building on which the solar system will be installed. Benchmarking will be performed using the online tool Portfolio Manager. This tool allows commercial customers to receive a number score comparing their building's energy efficiency to those of similar buildings.

The SB1 Guidelines also requires that all SIP applicants sign and submit a disclosure form. The purpose of the form is to ensure that the building owner is informed of all of the available efficiency measures that are applicable to their building. There will be two separate disclosure forms: one for commercial and one for residential. In addition to the two disclosure forms, a commitment agreement will be added to the Guidelines. The commitment agreement will need to be signed by commercial customers with a benchmark rating less than 75 and a building square footage larger than 100,000. This agreement allows the customer to keep their confirmed reservation but requires them to retrofit their building with more efficient equipment or appliances to improve their benchmark rating to exceed 75. A retrocommissioning report detailing the list of measures taken to improve the buildings rating past 75 will be required before an incentive payment is issued.

Newly Constructed Buildings

Applicants with newly constructed buildings will be required to prove that their building's energy efficiency is at least 15 percent above Title 24 Standards. This will be done through the submission of a completed CF-1R or PERF-1 signed by a Certified Energy Plans Examiner. This document will be required with the incentive application.

For commercial buildings that are constructed in phases with the shell built first and further energy systems installed in later phases as tenant improvements, an agreement shall be made between the building owner and the tenant. This agreement shall obligate future tenant improvements to install lighting, heating, ventilating, air conditioning, and water heating equipment necessary to meet the overall building tier level that was committed to by the building owner. A copy of the agreement shall be included with the PV system incentive application.

2. Modification of Incentive Formula

To facilitate consistency and continuity with utilities throughout the State, staff recommends that the method in which solar incentives are calculated be modified and based on the CSI Estimated Performance Based Buydown (EPBB) incentive structure. The EPBB incentive structure is based on the expected performance of a proposed solar system and provides higher incentives to well designed solar systems.

The current incentive formula is based on the expected kWh production of the solar system over 20 years; a cent per kWh pay rate is multiplied by the expected 20 year

output to calculate the incentive amount. The EPBB formula provides a more accurate representation of the system's expected performance. This calculation promotes the installation of summer optimized solar systems, benefiting LADWP by encouraging maximum solar energy production during the high peak season. Incentive amounts calculated with this formula will be rounded to the dollar.

The EPBB incentive incorporates the system's CEC- Alternating Current (AC) rating and utilizes a design factor in its calculation. The design factor essentially is a ratio that compares the expected performance of the proposed solar system to the performance of an optimal solar system in optimal conditions. This component of the new calculation is what encourages the installation of summer optimized solar systems. Furthermore, it considers solar system factors previously unaccounted for in the current formula, such as the installation method and additional PV module specifications, thus promoting quality, well designed installations.

3. Modification of the Incentive Rates

The popularity of the LADWP SIP resulted in a record number of incentive applications last year. Current incentive application submittal rates are exceeding LADWP's budgeted expenditure rate of \$33 million annually by over two times. This is largely due to the decrease in price of solar PV modules and the recent changes to the Federal Investment Tax Credit (ITC). The extension of the Federal ITC and removal of the \$2,000 cap on residential Federal ITCs has initiated an upsurge of activity in PV solar systems.

The LADWP SIP has a ten-step declining incentive, triggered by the MW of solar PV installed and interconnected to LADWP's electric grid which is consistent with other utilities in the State. Currently, residential, commercial, and government/non-profit incentives are paid using the Step 4 incentive rates. LADWP incentive applicants have the option of retaining the Renewable Energy Credits (RECs) or giving LADWP ownership. Applicants who agree to give LADWP ownership of the RECs receive incentives at the higher rates while applicants who elect ownership of the RECs receive incentives at the lower REC rate.

Converted to dollars per W, the current incentive rates for optimal, well designed solar systems would equate to the values seen in Table 1 below.

Table 1
Current Equivalent Incentive Rates
(\$/W)

Steps 1-10	Commercial	Residential	Government & Non-Profit	REC Ownership Option
1	\$3.56	\$4.53	\$4.53	\$2.81
2	\$3.24	\$4.21	\$4.21	\$2.52
3	\$2.91	\$3.88	\$3.88	\$2.23
4	\$2.59	\$3.56	\$3.56	\$1.91
5	\$2.26	\$3.24	\$3.24	\$1.62
6	\$1.94	\$2.91	\$2.91	\$1.32
7	\$1.62	\$2.59	\$2.59	\$1.03
8	\$1.29	\$2.26	\$2.26	\$0.74
9	\$0.97	\$1.94	\$1.94	\$0.42
10	\$0.64	\$1.62	\$1.62	\$0.12

In an effort to ensure that funds are available for all applicants and facilitate widespread participation in the SIP, it is recommended that the base incentive rates be lowered to State mandated levels. The proposed incentive rates would allow for funds to be distributed to more applicants seeking to install solar systems. There is no longer a need to provide base incentives exceeding the State mandated minimum levels because the cap on the Federal ITCs has been removed, the price of PV solar has decreased, and LADWP electric rates have increased. Incentives were originally set high at the inception of the SIP due to high solar equipment costs, the \$2,000 cap on residential Federal ITCs associated with installing solar, and low electric rates.

New incentive rates are hereby proposed in Table 2 for applicants who give LADWP ownership of the RECs. These proposed rates for applicants who opt out of REC retention are \$0.40/W higher than the State incentive rates, as LADWP provides the higher incentive to retain ownership of the RECs. Residential incentives are more than \$0.40/W higher than the State rates in step 4 and step 5 to facilitate the transition into the lower incentive. From step 6 on, residential, commercial, and government/non-profit base incentive rates will be equivalent to the State incentive rate structure for EPBB. The SIP has valued the worth of the REC to be \$0.40/W, thus this is the amount being offered to the customer for LADWP to retain ownership. Residential customers who choose to retain ownerships of RECs will see a \$0.90/W reduction in incentives, which is consistent with the State incentive levels in Step 4.

Table 2
 Proposed Incentive Rates
 (LADWP Owns RECs)

Steps 1-10	Commercial	Residential	Government & Non-Profit
1	----	----	----
2	----	----	----
3	----	----	----
4	\$2.30	\$2.80	\$3.05
5	\$1.95	\$2.20	\$2.70
6	\$1.50	\$1.50	\$2.25
7	\$1.05	\$1.05	\$1.80
8	\$0.75	\$0.75	\$1.50
9	\$0.65	\$0.65	\$1.30
10	\$0.60	\$0.60	\$1.10

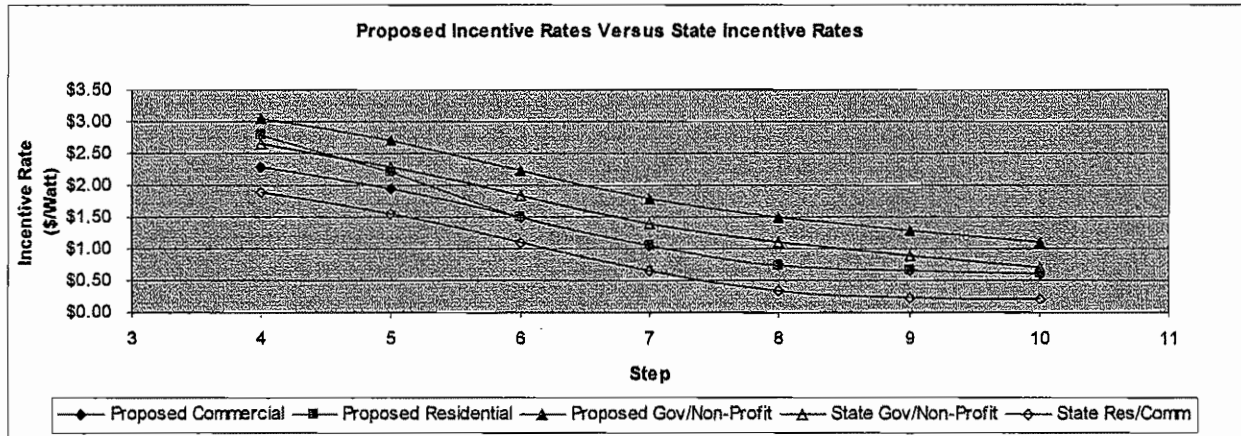
Applicants who elect ownership of the RECs will receive incentives at the State incentive levels as seen in Table 3.

Table 3
 Proposed Incentive Rates.
 (Customer Owns REC)

Steps 1-10	Commercial	Residential	Government & Non-Profit
1	----	----	----
2	----	----	----
3	----	----	----
4	\$1.90	\$1.90	\$2.65
5	\$1.55	\$1.55	\$2.30
6	\$1.10	\$1.10	\$1.85
7	\$0.65	\$0.65	\$1.40
8	\$0.35	\$0.35	\$1.10
9	\$0.25	\$0.25	\$0.90
10	\$0.20	\$0.20	\$0.70

See chart 1 below for a comparison of the proposed rates to the State incentive rates.

Chart 1
 Proposed Incentive Rates Versus State Incentive Rates



Applicants who install with Building Integrated Photovoltaic Panels (BIPV) or panels that qualify for the Los Angeles Manufacturing Credit (LAMC) will continue to receive a supplement incentive in addition to the base incentives noted above. Commercial applicants will receive an additional \$0.30/W to their base incentive while Residential and Government/Nonprofit applicants will receive an additional \$0.60/W. See Table 4 below. The \$0.30/W and \$0.60/watt incentives are roughly equivalent to the \$0.01/kWh and \$0.02/kWh incentives currently given for BIPV and LAMC installations.

Table 4
 BIPV and LAMC Supplement Incentive Rates (Step 4)

Customer Type	Base Incentive Rate (\$/W)	LAMC or BIPV Supplement (\$/W)	Maximum Incentive Rate (\$/W)
Residential	\$2.80	\$0.60	\$3.40
Commercial	\$2.30	\$0.30	\$2.60
Govt. & Non-Profit	\$3.05	\$0.60	\$3.65

Current Incentive Comparison to EPBB Incentive

The following table compares incentive amounts of the EPBB and LADWP incentives using the proposed and current incentive rates, respectively, with the RECs being assigned to LADWP. The comparisons are modeled after optimal, well designed systems. Since the current formula and EPBB incentive formula favor annual and summer optimized solar systems respectively, the following EPBB incentives will be calculated using a solar system with a summer optimized

configuration while incentives using the current incentive formula will be calculated using a system optimized for annual production. See Table 5 below.

Table 5
Incentive Formula Comparisons

Steps 4-10	Incentive Formula	4kW Residential	30kW Commercial	100kW Gov/Non- Profit
4	Proposed Formula	\$11,200	\$69,000	\$305,000
	Current Formula	\$14,256	\$77,760	\$356,400
5	Proposed Formula	\$8,800	\$58,500	\$270,000
	Current Formula	\$12,960	\$68,040	\$324,000
6	Proposed Formula	\$6,000	\$45,000	\$225,000
	Current Formula	\$11,664	\$58,320	\$291,600
7	Proposed Formula	\$4,200	\$31,500	\$180,000
	Current Formula	\$10,368	\$48,600	\$259,200
8	Proposed Formula	\$3,000	\$22,500	\$150,000
	Current Formula	\$9,072	\$38,880	\$226,800
9	Proposed Formula	\$2,600	\$19,500	\$130,000
	Current Formula	\$7,776	\$29,160	\$194,400
10	Proposed Formula	\$2,400	\$18,000	\$110,000
	Current Formula	\$6,480	\$19,440	\$162,000
Assuming Optimal Configuration and Location				

One of the original intentions during the development of the SIP was to encourage the installation of residential solar during a time when residential Federal ITCs were capped at \$2,000. Now that the residential Federal ITC has been extended and the cap removed, staff recommends lowering incentive rates to a level consistent with the State incentive rates.

The differences in residential incentive amounts presented between the formulas and rates in Table 5 are not nearly as large when you consider that the current rates were set with a capped Federal ITC of \$2,000 in mind. For example, a 4 kiloWatt (kW) residential system will cost a customer roughly \$36,000 and result in a Step 4 incentive of approximately \$14,256 with the current program. This means that with the addition of a \$2,000 Federal ITC (capped in this example to keep with the original intention of the program), a residential customer would have received a net incentive of roughly \$16,256. Under current conditions the incentive with the proposed formula and rates would be \$11,200, plus a Federal ITC of \$7,440, totaling a net incentive of \$18,640. Customers would actually receive a higher net incentive with the proposed incentive rates when you take into account that the current incentive rates were set with a capped Federal ITC in mind.

4. Software Automation (PowerClerk)

The popularity and success of the LADWP SIP has led to an accelerated volume of submitted applications. In an effort to facilitate the application process for both applicants and staff, staff is acquiring software to automate portions of the application process. Staff is procuring PowerClerk, an online application submission tool that allows applicants to complete, submit, and monitor their incentive applications over the web. This benefits the applicant tremendously as they can complete and monitor their application electronically and minimize the number of errors that administrative staff has to correct. Application Forms will be completed, submitted, and monitored through PowerClerk. PowerClerk is already used by several other utilities including the three major investor owned utilities.

5. Other Changes

The revised SIP Guidelines also include several minor changes to clarify existing requirements, improve safety and technical reviews, and clearly indemnify the LADWP. These modifications are:

1. Change all interconnection requirement references in the Guidelines from 11kW to 10kW to be consistent with the rate ordinance pertaining to this requirement.
2. Require applicants with proposed solar systems 10 kW or greater to complete and submit a Preliminary Review Information Sheet to determine the installation feasibility of the proposed solar system. This document asks technical and project specific questions pertaining to the proposed solar installation. The purpose of this document is to determine the practicability of a proposed solar project before installation. Confirmed reservations for systems 10 kW and greater will not be given until program administrators have received and approved this form.
3. Require that contractors for solar projects greater than or equal to 20 kW AC have a valid "C-10" (Electrical Contractor) or "A" (General Engineering) license. The reasoning is that projects above 20 kW AC require engineering review at LADWP and tend to be more complicated. Staff feels the license requirements for such projects should be more stringent. The current license requirements will remain for projects smaller than 20 kW AC – in addition to "A" and "C-10" licenses, valid "B" (General Building) or "C-46" (Solar Specialty) licenses will be required.
4. Addition of the following clauses to the leasing requirements:
 - Require notification to SIP Administrators when a lessor modifies a lease after LADWP and City Attorney review;
 - Require lessor to explicitly identify in the lease who is acquiring ownership of the RECs; and
 - Require that incentive recipients who fail to keep the system operational and in place for the entire duration upon which the incentive was based to

- reimburse LADWP (on a pro rated basis) for the portion of the incentive received during which time the system was not in operation.
5. Require applicants installing Battery Backups on their solar system to submit an Operational Listing detailing a precise list of steps of what were to happen if the LADWP grid were to lose power.
 6. Require customers to notify LADWP if they intend to install a Battery Backup to their solar system after LADWP inspection.
 7. Increase the 50 percent of system cost incentive eligibility limit for government and non-profit entities to 75 percent. Currently, incentives for non-taxable non-residential entities are limited to 50 percent of the gross installed cost of the system. As customers install larger and more efficient PV systems, economies of scale allow for lower system costs. Government and non-profit entities incentives often reach this limit, thus staff recommends raising the eligibility limit to 75 percent.
 8. Removal of the Section 2.3 of the Guidelines pertaining to Affordable Housing Projects. This clause in the Guidelines ensures that \$1 million per fiscal year is set aside for Affordable Housing Projects. This section is not needed as funding for solar projects regardless of customer categorization is available until the total program funds are depleted.
 9. Removal of section 6.3 of the Guidelines pertaining to Orientation Adjustment Allowance. This clause is no longer needed as the design factor in the proposed EPBB formula favorably treats PV systems oriented between 180° and 270° equally.
 10. Removal of Section 7.4 pertaining to the LAMC substitution allowance. This clause allowed non Los Angeles manufactured modules to receive the LAMC credit when modules were to be replaced by those produced in Los Angeles. This provision is difficult to enforce and creates an opportunity for misappropriation. We will still provide the LAMC but only for modules that are actually manufactured in Los Angeles which is the intent of this section.
 11. Addition of a signatures section making it clear to applicants and their contractors that they are bound by the Guidelines.
 12. Addition of a section indemnifying LADWP against claims associated with a customer's participation in the SIP.

All of these modifications have been incorporated as revisions into the Program Guidelines for approval by your Honorable Board.

RECOMMENDATION

It is recommended that your Honorable Board adopt the attached Resolution authorizing the revised Guidelines be implemented starting November 1, 2010. These changes are subject to future modifications based on development of the Los Angeles Comprehensive Solar Plan and any other financial, legislative, or regulatory changes that may impact the Solar Incentive Program.

Board of Water and Power Commissioners
Page 12
September 20, 2010

KP:ec

Attachment

e-c/att: Austin Beutner

Raman Raj

Richard M. Brown

Aram Benyamin

James B. McDaniel

Cecilia K.T. Weldon

Mario C. Ignacio

Maria Sison-Roces

John R. Dennis

Michael S. Webster

William D. Glauz

John D. Gutenberger

Kenneth Pritchett

RESOLUTION NO. _____

WHEREAS, the Los Angeles Department of Water and Power (LADWP) Board of Water and Power Commissioners (Board) adopted Resolution No. 000-288 on June 6, 2000, establishing LADWP's Residential and Commercial Photovoltaic Buydown Incentive Program; and

WHEREAS, the Board adopted Resolution No. 007-019 on July 25, 2006, approving revised design and performance-based Solar Incentive Program (SIP) Guidelines (Guidelines) to be in place through 2010; and

WHEREAS, the Governor of California approved Senate Bill No. 1 (SB1) on August 21, 2006, enacting the California Solar Initiative, declaring, among other things, a State goal to install 3,000 megawatts (MW) of solar energy systems by 2017; and

WHEREAS, SB1 added Section 387.5 to the Public Utilities Code, requiring local publicly owned electric utilities to, among other things, offer customers an initial monetary incentive of at least \$2.80 per installed watt for the installation of solar energy systems, and setting a cap amount of \$784 million over ten years for these utilities; and

WHEREAS, LADWP's portion of the State goal is 280 MW with a cap of \$313 million over ten years; and

WHEREAS, the Board adopted Resolution No. 008-053 on September 4, 2007, re-establishing the SIP Guidelines to be effective from October 1, 2007, through December 31, 2016; and

WHEREAS, the Board adopted Resolution No. 009-164 on January 21, 2009, approving revisions to the LADWP SIP Guidelines; and

WHEREAS, the LADWP SIP seeks to increase the use of solar energy throughout the City of Los Angeles; and

WHEREAS, SIP funding will continue to be allocated among the following categories: Residential and Non-Residential, including taxable and non-taxable customers; and

WHEREAS, flexibility is provided to LADWP staff to allow funds to be moved between these categories to meet SIP needs and customer demand as necessary, at the discretion of the General Manager; and

WHEREAS, the cap on residential federal investment tax credits has been removed, solar equipment prices have decreased, and LADWP would like to streamline the incentive process, facilitate program consistency with the State, and allow for widespread participation in the SIP.

NOW, THEREFORE, BE IT RESOLVED that in effort to comply with SB1, modify the incentive payment formula and rates, and improve the incentive process for potential solar power users, the attached SIP Guidelines, as amended are hereby approved and adopted by the Board and shall be effective as of November 1, 2010.

BE IT FURTHER RESOLVED that SIP funding will continue to average \$33 million annually over the entire life of the program, and

BE IT FURTHER RESOLVED that LADWP staff are authorized to make non-substantive technical modifications to the SIP Guidelines as necessary to correct errors or improve clarity, and

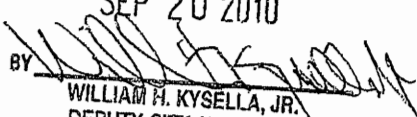
BE IT FURTHER RESOLVED that the Chief Accounting Employee of LADWP, upon proper certification, is authorized and directed to draw demands on the Power Revenue Fund in payment of the obligations arising under this resolution and Resolution Nos. 009-164, 008-053, 007-019, 005-069 and 003-313, and

BE IT FURTHER RESOLVED that the President, Vice President, or the General Manager, or such person as the General Manager shall designate in writing, shall continue to have authority through December 31, 2016, to execute any and all agreements connected to the SIP for and on behalf of LADWP, including, without limitation, self-generation interconnection agreements and Solar Incentive Claim Forms.

I HEREBY CERTIFY that the foregoing is a full, true, and correct copy of the resolution adopted by the Board of Water and Power Commissioners of the City of Los Angeles at its meeting held

Secretary

APPROVED AS TO FORM AND LEGALITY
CARMEN A. TRUTANICH, CITY ATTORNEY

SEP 20 2010
BY 
WILLIAM H. KYSELLA, JR.
DEPUTY CITY ATTORNEY