

August 5, 2022

VIA E-FILING

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: Solar Star California XII, LLC, et al., Docket Nos. QF10-136-___, et al.
Informational Filing**

Dear Secretary Bose:

MN8 Energy LLC (“MN8 Energy”),¹ on behalf of its portfolio companies that directly own qualifying facilities (“QF”), is submitting this filing in the dockets listed in Attachment 1² hereto to inform the Federal Energy Regulatory Commission (the “Commission” or “FERC”) of its intent to recertify the 455 small power production QFs in its portfolio over the course of the next thirty (30) business days to reflect a material change that occurred on August 4, 2022.

In *Irradiant Partners, LP*, the Commission recognized that “the regulations do not explicitly state when a QF must file for recertification to reflect a material change.”³ Nevertheless, the Commission clarified that “recertification is required when the material change is made.”⁴ In so clarifying, the Commission noted that “if the material change and the date of the change can be reasonably anticipated,” the Form No. 556 could be filed in advance of the change “to ensure continued compliance.”⁵ The Commission also noted that it “reviews recertifications (i.e., the filing of an updated Form No. 556) on a case-by-case basis to ensure that the recertification is timely filed.”⁶

In the wake of *Irradiant Partners* and in anticipation of a material change, the exact nature and timing of which was not finalized until recently, counsel for MN8 Energy solicited

¹ MN8 Energy was formerly known as Goldman Sachs Renewable Power LLC.

² MN8 Energy is submitting the filing in multiple batches to manage administratively filing in 455 dockets.

³ 178 FERC ¶ 61,215 at P 17 (2022) (“*Irradiant Partners*”).

⁴ *Id.*

⁵ *Id.* at n.36.

⁶ *Id.* at P 17.

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informal advice from FERC Staff in the Commission's Office of Enforcement, Office of the General Counsel, and Office Energy Market Regulation regarding how best to balance the improbability of submitting 455 QF recertifications "when the material change is made" with ensuring continued compliance. Based on conversations with FERC Staff, MN8 Energy intends to strike a balance by submitting the 455 QF recertifications over the course of the next thirty (30) business days and in any event by no later than September 16, 2022.

Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

/s/ Margaret H. Claybour
Margaret H. Claybour

ATTORNEY FOR MN8 ENERGY LLC

Attachment

cc: Cristina Melendez (Office of Enforcement)
Jerilyn Sodee (Office of the General Counsel)
Thomas Bayly (Office of Energy Market Regulation)

ATTACHMENT 1

Applicant	Root Docket No.
Solar Star California XII, LLC	QF10-136
Solar Star California VII, LLC	QF10-182
Solar Star New Jersey IV, LLC	QF10-548
Solar Star YC, LLC	QF10-673
Solar Star Arizona I, LLC	QF11-176
RE Bruceville 3 LLC	QF11-428
RE Dillard 1 LLC	QF11-429
RE Dillard 3 LLC	QF11-430
RE Dillard 4 LLC	QF11-431
RE Bruceville 2 LLC	QF11-432
RE Kammerer 1 LLC	QF11-433
RE Kammerer 2 LLC	QF11-434
RE Kammerer 3 LLC	QF11-435
RE Dillard 2 LLC	QF11-436
RE Bruceville 1 LLC	QF11-437
RE McKenzie 1 LLC	QF11-438
RE McKenzie 3 LLC	QF11-439
RE McKenzie 4 LLC	QF11-440
RE McKenzie 5 LLC	QF11-441
RE McKenzie 6 LLC	QF11-442
RE McKenzie 2 LLC	QF11-444
RE Victor Phelan Solar One LLC	QF12-196
RE Rosamond Two LLC	QF12-197
RE Rio Grande LLC	QF12-198
RE Columbia 3 LLC	QF12-199
Solar Star California XV, LLC	QF12-20
RE Rosamond One LLC	QF12-223
RE Gillespie 1 LLC	QF12-258
Solar Star Oceanside, LLC	QF13-145
Solar Star Arizona III, LLC	QF13-216
Picture Rocks Solar, LLC	QF13-22
Bryan Solar, LLC	QF13-23
SunE DM, LLC	QF13-545
SunE DM, LLC	QF13-549
Sol Orchard San Diego 21, LLC	QF13-653
Sol Orchard San Diego 22, LLC	QF13-654
Sol Orchard San Diego 23, LLC	QF13-655
Sol Orchard San Diego 20, LLC	QF13-656
Solar Star Arizona V, LLC	QF14-151

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Applicant	Root Docket No.
Solar Star Arizona VI, LLC	QF14-152
Solar Star Arizona IV, LLC	QF14-187
SBS Energy Partners, LLC	QF14-361
GRE 314 East Lyme LLC	QF14-782
Solar Star California XXIX, LLC	QF14-783
Utah Red Hills Renewable Park, LLC	QF14-784
GRE Fund I Projectco 1 LLC	QF14-810
GRE Fund I Projectco 1 LLC	QF14-813
GRE Fund I Projectco 1 LLC	QF14-814
GRE Fund I Projectco 1 LLC	QF14-816
GRE Fund I Projectco 1 LLC	QF14-817
GRE Fund I Projectco 1 LLC	QF14-818
WCMD Spear Point Solar I, LLC	QF15-1011
GRE Fund I Projectco 2 LLC	QF15-106
GRE Fund I Projectco 2 LLC	QF15-107
GRE Fund I Projectco 2 LLC	QF15-108
GRE Fund I Projectco 2 LLC	QF15-109
GRE Fund I Projectco 2 LLC	QF15-110
GRE Fund I Projectco 2 LLC	QF15-111
GRE Fund I Projectco 2 LLC	QF15-112
Solar Star California XXVIII, LLC	QF15-191
GRE Fund I Projectco 3 LLC	QF15-302
GRE Fund I Projectco 3 LLC	QF15-305
GRE Fund I Projectco 3 LLC	QF15-307
GRE Fund I Projectco 3 LLC	QF15-310
GRE Fund I Projectco 3 LLC	QF15-313
Klamath Falls Solar 2, LLC	QF15-719
WCMD Spear Point Solar II, LLC	QF15-799
Solar Star California XL, LLC	QF16-1010
GRE Fund II Projectco 7 LLC	QF16-1095
GRE Fund II Projectco 7 LLC	QF16-1096
GRE Fund II Projectco 7 LLC	QF16-1097
GRE Fund II Projectco 7 LLC	QF16-1098
GRE Fund II Projectco 7 LLC	QF16-1099
GRE Fund II Projectco 7 LLC	QF16-1100
GRE Fund II Projectco 7 LLC	QF16-1101
GRE Fund II Projectco 7 LLC	QF16-1102
GRE Fund II Projectco 7 LLC	QF16-1103
GRE Fund II Projectco 7 LLC	QF16-1104

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Applicant	Root Docket No.
CEC Solar #1063, LLC	QF16-1161
CEC Solar #1114, LLC	QF16-1163
GRE Fund II Projectco 8 LLC	QF16-1178
GRE Fund II Projectco 8 LLC	QF16-1179
GRE Fund II Projectco 8 LLC	QF16-1180
GRE Fund II Projectco 8 LLC	QF16-1181
GRE Fund II Projectco 8 LLC	QF16-1182
GRE Fund II Projectco 8 LLC	QF16-1183
GRE Fund II Projectco 8 LLC	QF16-1184
GRE Fund II Projectco 8 LLC	QF16-1185
GRE Fund II Projectco 8 LLC	QF16-1186
GRE Fund II Projectco 8 LLC	QF16-1204
GRE Fund II Projectco 8 LLC	QF16-1205
GRE 331 Canterbury LLC	QF16-1277
GRE Fund II Projectco 9 LLC	QF16-1278
GRE Fund II Projectco 9 LLC	QF16-1279
GRE Fund II Projectco 9 LLC	QF16-1280
GRE Fund II Projectco 9 LLC	QF16-1282
GRE Fund II Projectco 9 LLC	QF16-1283
WCMD Spear Point Solar IV, LLC	QF16-201
GRE Fund II Projectco 1 LLC	QF16-321
GRE Fund II Projectco 1 LLC	QF16-322
GRE Fund II Projectco 1 LLC	QF16-323
GRE Fund II Projectco 1 LLC	QF16-324
GRE Fund II Projectco 1 LLC	QF16-325
GRE Fund II Projectco 1 LLC	QF16-326
GRE Fund II Projectco 1 LLC	QF16-327
GRE Fund II Projectco 1 LLC	QF16-328
GRE Fund II Projectco 1 LLC	QF16-329
GRE Fund II Projectco 1 LLC	QF16-330
WCMD Spear Point Solar III, LLC	QF16-541
GRE Fund II Projectco 2 LLC	QF16-676
GRE Fund II Projectco 2 LLC	QF16-677
GRE Fund II Projectco 2 LLC	QF16-678
GRE Fund II Projectco 2 LLC	QF16-679
GRE Fund II Projectco 2 LLC	QF16-680
GRE Fund II Projectco 2 LLC	QF16-681
GRE Fund II Projectco 2 LLC	QF16-682
GRE Fund II Projectco 2 LLC	QF16-683

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