



CPS ENERGY  
P.O. BOX 1771  
SAN ANTONIO, TX 78296-1771  
<https://www.cpsenergy.com/bids>

### Questions & Answers

**Project:** RFP No. 7000161070– *FlexPOWER Bundle*

**Deadline for Respondent’s Questions:** August 5, 2020 by 5:00 p.m. (Central Time)

**CPS Energy Responses to Submitted Questions:** August 12, 2020 by 5:00 p.m. (Central Time)

**Note:** Although the Question and Answer period has ended for technical questions, respondents are welcome to ask questions regarding the RFP and its process at any time.

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**General Statement:** For this Request for Information (RFI), CPS Energy allows Respondents to be creative and propose innovative solutions with limited constraints. Please keep this in mind when reviewing our answers to the following questions. After receiving and reviewing Responses to the RFI, CPS Energy plans to issue an RFP that would have more defined specifications for resources and solutions. Responses to this RFI will help CPS Energy further develop and refine specifications for that RFP.

Category	Count	Question Number
Energy Storage	19	2, 3, 4, 5, 6, 29, 31, 34, 39, 40, 41, 43, 59, 74, 77, 79, 80, 81, 82
Demand Side Resources - EE/DR	8	13, 14, 24, 51, 52, 53, 59, 64
Electric Vehicles	4	26, 27, 54, 55
Firming Capacity	3	7, 11, 22
Solar	3	8, 9, 12
Emerging Technologies	2	16, 46
Global Projects	1	17
Miscellaneous	56	1, 10, 15, 18, 19, 20, 22, 23, 25, 28, 30, 32, 33, 35, 36, 37, 38, 43, 44, 45, 47, 48, 49, 50, 56, 57, 60, 61, 62, 63, 65, 66, 67, 68, 69, 70, 71, 72, 73, 75, 76, 78, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94
<b>Total Questions</b>	<b>94</b>	



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1. Regarding in-front-of-the-meter opportunities, do you prefer delivery to the ERCOT bus or hub? If hub, can you please share which hub(s) is/are preferred?

Answer: CPS Energy has not specified a preferred delivery location(s) for this RFI other than the projects be in ERCOT. As stated in section V.B.12 of the RFI, "CPS Energy will be looking to minimize congestion risk".

**Please refer to General Statement.**

2. What would be the intended use case for the battery, and how would CPS plan on scheduling it? Further, if we are bidding solar+storage, does CPS have any requirements regarding grid charging?

Answer: CPS Energy may use a battery for capacity, energy, ancillaries, and/or other services, depending on the particular project. Use cases and scheduling would be determined at a later time.

For this RFI, CPS Energy has not specified charging requirements or configurations for solutions incorporating solar and/or storage.

**Please refer to General Statement.**

3. Is a stand-alone battery storage project preferred over a co-located offering?

Answer: For this RFI, CPS Energy is not specifying a preference for stand-alone batteries or co-located offerings. CPS Energy will review proposed solutions for both stand-alone and co-located battery storage offerings.

**Please refer to General Statement.**

4. What is CPS looking for in terms of fixed capacity or flexible capacity over the term, what is the desired duration for the battery, and how many cycle times per day is desired?

Answer: CPS Energy has not specified total capacities or capacity ratios for this RFI. CPS Energy has also not specified a desired battery duration or cycling schedule. CPS Energy is interested in ideas of the Respondents that are competitively priced and can optimize value.

**Please refer to General Statement.**

5. What is the desired contract term length for a battery; would it be more on the 10 years or more on the 25 year end of the spectrum provided?

Answer: CPS Energy has not specified a desired contract term for a battery further than what is stated in section V.B.5 of the RFI.

***V.B.5 - Proposed Term** for which Respondent has or would have capacity, energy, or demand side savings available to commit. Should CPS Energy issue an RFP after this RFI, it will be*



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*seeking long-term commitments of approximately 10 to 25 years for solar, storage, and demand side Resources and 4 to 10 years for other Resources that may provide firm capacity and energy.*

CPS Energy is interested in hearing Respondent positions on contract terms that may provide the greatest value for both parties.

6. When is CPS desiring the battery (and other resources) to achieve COD?

Answer: As stated in section V.B.6 of the RFI, CPS Energy would like projects to be available as soon as possible but does not have a hard-set deadline on Commercial Operation Date.

7. The RFI states that: "In this document, CPS Energy also refers to "low-emitting" as having an emissions profile similar to or better than that of a Natural Gas Combined Cycle resource." Can CPS explain if that is on a carbon intensity basis (i.e., CO<sub>2</sub>/MWh) or total emissions over the year? If the former, can CPS confirm that combustion turbines will not be considered eligible for this RFI.

Answer: CPS Energy is interested in the emissions rates for your proposed resources. The comparison reference to Natural Gas Combined Cycle resources is meant to be a general guideline for the purposes of this RFI. There are no absolute technology exclusions. For this RFI, CPS Energy is interested in information on solutions from any and all sources that can meet goals stated in the RFI and of our FlexPATH strategy.

**Please refer to General Statement.**

8. Is there an internal estimate of desired ratio for the 900MW of Solar CPS Energy has indicated it will pursue: Utility/Community/Market/City Services/Rooftop?

Answer: For this RFI, CPS Energy has not specified quantities or ratios for project types.

**Please refer to General Statement.**

9. Can COMPANY respond to this RFI as a module manufacturer (module supplier) to supply solar modules?

Answer: For this RFI, CPS Energy is not interested in information that would indicate Respondent would just furnish modules. CPS Energy is requesting turnkey solutions that can provide energy or demand savings.

10. We would like to suggest local content preference, what is the best way to address this?

Answer: CPS Energy welcomes feedback through this RFI process and looks forward to receiving and reviewing all information and suggestions.



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11. Please define types of products that makeup this capacity

Answer: As stated in the RFI, CPS Energy is open to reviewing information on solutions from any and all sources that can meet the goals of our Flexible Path strategy.

12. New solar panel module technology can be in this category?

Answer: See answer on question 9.

13. Will financing from flex step help fund the above?

Answer: We are seeking demand sided solutions that could be a good fit for *FlexSTEP* as new and innovative additions to the portfolio.

14. Can you provide some Flex Step details?

Answer: *FlexSTEP* is envisioned as our next generation energy management and conservation program. *FlexSTEP* builds on the success of our original Save for Tomorrow Energy Plan (STEP). In this solicitation, we are seeking demand side solutions that can potentially become a part of the *FlexSTEP* portfolio. The focus is on new and innovative approaches to helping customers save energy and/or participate in renewable energy.

15. Will the incentive that CPSE offers for local content be applicable to FlexPower Bundle Projects and the FlexSTEP financing?

Answer: **Please refer to General Statement.**

16. Scenario - The bidder is a new technology vendor with a technology that is not commercially available yet (still at prototype stage), and 2. this bidder does not have a site-specific project (because the bidder would be a vendor), does it fall under the RFI? Or should this company use a different route (R&D department of CPS) for its prototype?

Answer: For technologies not currently commercially available, see section V.B.18 in the RFI. Additional details, including technical descriptions and non-biased expert analyses, should be provided where they exist. All other information requested by CPS Energy in the RFI should be provided as available and applicable.

17. The technology that I am proposing is a form of non-battery energy storage that is being developed by COMPANY. Can a foreign company respond to your FYI solicitation directly or must it be an American company representing the foreign entity?



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Answer: Yes, foreign companies may respond. We are interested in global solutions, so responses may originate from around the world. Ultimately, whenever CPS Energy partners with solution providers, compliance with applicable U.S. trade law and any trade restrictions will be required.

18. Can our response be a general statement explaining our technology or must it also describe in some detail how it fits in with your specific needs?

Answer: Responses should follow the submittal requirements discussed in the RFI as close as possible.

19. Can we propose multiple projects with multiple offers (different PPA term and prices)? Is there a maximum number of offers that we can propose?

Answer: There is no maximum number of offers that you may propose. You may propose multiple projects with multiple offers.

20. We're proposing to sell energy and RECs as a developer of the solar projects. In my understanding, we're proposing as a supply side solution, but what does it mean to be a demand side solution in this RFI?

Answer: A demand side solution is one which reduces customers' need for energy. This could encompass energy efficiency, demand response, solar, etc. So, for example, a solar project on the customer side of the meter would be demand side.

21. In the RFI, can you clarify more what does it mean by "firm capacity"?

Answer: In section II, RESOURCES AND SOLUTIONS OF INTEREST, we define how we use "firming" Resources in the RFI document:

*"In this document, CPS Energy refers to "firming" resources as Resources that can provide reliable generation capacity with availability during all hours, year-round, and through all-weather events, with low emissions."*

This is also meant to apply to how we have used "firm capacity and energy" in section B.5.

22. Proposed Contracting Solutions. CPS Energy is primarily interested in power purchase options but is open to other possible arrangements or structures.

Regarding these comments, if possible, could you provide the previous examples that CPS energy successfully executed?



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We're facing various structures in the market and will be happy to learn and propose if CPS has any preferences.

Answer: Per RFI, V.B.15, "CPS Energy is primarily interested in power purchase options but is open to other possible arrangements or structures."

**Please refer to General Statement.**

23. Does CPS Energy have preferred volume, PPA term and settlement point? If any, we'll be glad to refer to it.

Answer: CPS Energy has not specified a preferred delivery location(s) for this RFI other than that the projects be in ERCOT. As stated in section V.B.12 of the RFI, "CPS Energy will be looking to minimize congestion risk".

**Please refer to General Statement.**

24. Can you confirm that CPS would be interested in receiving more information from COMPANY?

Answer: For this RFI, CPS Energy is interested in solutions that can provide energy (MWh) or demand savings. If your solution can provide energy or demand savings and meet the goals stated in the RFI, we are interested in reviewing information about your solution. Ultimately, whenever CPS Energy partners with solution providers, compliance with applicable U.S. trade law and any trade restrictions will be required.

25. Is the program to be offered just in CPS service territory?

Answer: Retail energy solutions would apply in just the CPS Energy service territory. Wholesale solutions would apply in the ERCOT grid.

26. Do you know the number of EVs in this service territory?

Answer: The number of EV's in zip codes served by CPS Energy is estimated to be between 3860 (as of 5/31/20) and 4250 (as of 3/31/20). The former number represents vehicle registration records and the latter represents vehicles in operation records. Our numbers are received monthly, with a 6-12-week lag.

27. Has CPS collected any data on EV Charging behavior

Answer: For customer privacy reasons, CPS Energy cannot disclose customer data, but does have access to data.



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28. Do you have a pro forma standalone storage term sheet/PPA doc upon which bids can be based?

Answer: For this RFI, CPS Energy is not providing a standardized term-sheet. This RFI intentionally has limited constraints to give Respondents the ability to be innovative.

**Please refer to General Statement.**

29. Should standalone storage bids be submitted on a \$/kW-mo basis?

Answer: \$/kW-month is an acceptable basis. Respondents are not required to use this basis.

**Please refer to General Statement.**

30. Do you have locational preferences for renewables or storage?

Answer: CPS Energy has not specified preferred delivery location(s) for this RFI other than that the projects be in ERCOT. As stated in section V.B.12 of the RFI, "CPS Energy will be looking to minimize congestion risk".

**Please refer to General Statement.**

31. Do you have a preference on how standalone battery storage is bid (AS only, full toll, etc)?

Answer: CPS Energy has not stated a preference for this RFI.

**Please refer to General Statement.**

32. What is your expectation regarding unit availability?

Answer: CPS Energy has not stated a preference for this RFI.

**Please refer to General Statement.**

33. For Ancillary Services products, do you require physical delivery or can it be financial?

Answer: CPS Energy is interested in physical delivery.

34. What is your expectation regarding degradation/capacity maintenance?

Answer: CPS Energy has not stated an expectation in this RFI, but would expect respondent to clearly identify the firm amount of capacity that would be available for the term of a proposed agreement.



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35. When do you expect the RFP to be issued?

Answer: CPS Energy plans to issue an RFP by the 1<sup>st</sup> Qtr. 2021.

36. How many non-residential (business and public institution) accounts and meters does CPS serve?

<b>Rate Category</b>	<b>Electric*</b>	<b>Gas*</b>
General Service PL (PL)	84,193	
Large Lighting & Power (LLP)	2,067	
Extra Large Power (ELP)	298	
Super Large Power (SLP)	284	
Industrial Gas Class B (Class B)		1,335
Large Volume Gas (LVG)		250

37. Is a breakdown of this information by peak demand or rate classification available (e.g. small, medium, large customer classification)?

Answer: See answer to question 38.

38. Does CPS want an RFI response for each generation/power technology (Wind/Solar/ Storage) or would one response from a development company, which includes all technologies be acceptable? Our ERCOT development which we plan to introduce includes all three of these technologies on one development site.

Answer: One response would be acceptable.

39. Does Battery Energy Storage qualify as a new technology solution (i.e. for the 500MW firming capacity)?

Answer: Solutions incorporating any and all sources that can meet the goals stated in the RFI are of interest.

In section II of the RFI, CPS Energy refers to “firming” resources as Resources that can provide reliable generation capacity with availability during all hours, year-round, and through all-weather events, with low emissions.

40. For the 50 MW ESS, does it need to be stand-alone system or can it be tied to solar (i.e. behind the same Point of Interconnection)?



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Answer: Refer to answers on question 2 and 3 and General Statement.

41. What is preferred (or intended) duration, annual cycles and minimum capacity for ESS?

Answer: Refer to answer on question 4 and General Statement.

42. What is preferred (or intended) application type/use case the 50 MW ESS? Is preferred use case ancillary service (Fast Responding Regulation service, Fast Frequency Response etc.), Demand Response, 4CP, solar shifting or a combination of all use cases?

Answer: Refer to answer on question 2 and General Statement.

43. Please could you provide more color on what other possible arrangement or structures CPS is open to under Proposed Contracting Solutions (Section V.B.15)?

Answer: Refer to answer on question 23 and General Statement.

44. If an RFP is issued, will the process and/or award be governed by procurement procedures for municipalities or the procurement procedures alternative?

Answer: As we are in the RFI stage, we have not yet determined any certainty regarding if, how or when an RFP will be issued.

45. If CPS Energy were to move towards an RFP, will there be multiple awards?

Answer: CPS Energy would make that determination after it finalized an RFP and evaluated responses to that RFP.

46. CPS Energy has historically been on the forefront of implementing new technologies. Will CPS Energy consider new technology as part of their Flexible Path

Answer: Definitely! Part of the purpose of this RFI is to learn of and understand what new technology solutions may be available.

47. Do respondents need to have site control or shovel-ready projects in order to respond to a potential RFP?

Answer: As stated in the 1<sup>st</sup> paragraph of section II of the RFI, we are interested in existing, in-development, planned, and potential solutions.

48. What is the system wide peak and its duration?

Answer: The CPS Energy record retail peak demand is 5,159 MW, set on August 26, 2019 during the hour ending 1900.



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Peak energy durations can vary. CPS Energy operational details and load and demand profiles will not be shared as a part of this RFI.

**Please refer to General Statement.**

49. Are there any locations or segments of the grid would benefit from capacity resources? (i.e. reliability resiliency or infrastructure deferral)?

Answer: For this RFI, CPS Energy has not specified locational preferences.

**Please refer to General Statement.**

50. Are there any sub-system level peaks?

Answer: Please see answer to question 50.

51. Does CPS envision any demand response programs focused on specific demographics in the service territory? (such as something focused on Low Income)?

Answer: CPS Energy envisions our demand response program be open and available for all customers. The product and delivery may vary by specific customer segment.

52. Are there any specific geographic areas of CPS Energy's grid where there is congestion or other reasons for specific targeted demand response?

Answer: See Answer to question 51.

53. Does CPS want to utilize the demand response / DER program to facilitate customer engagement with any specific customer segment? (e.g. – Small Businesses, Medium Businesses, etc.?)

Answer: CPS Energy envisions our demand response program be open and available for all customers. The product and delivery may vary by specific customer segment.

54. Does CPS Energy consider electric vehicle charging to be a demand side resource that can be part of a larger DR solution?

Answer: Yes.

55. Can CPS Energy provide data or information on EV charging patterns in the territory?



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Answer: For customer privacy reasons CPS Energy cannot disclose any data or information on EV charging patterns.

56. Does CPS have any properties that could be used in an enhanced use, or other format, lease to locate a project?

Answer: CPS Energy would be open to RFI responses that propose a solution that could be located on CPS Energy property.

57. For clarification the phrase “competitively priced power and demand side energy savings.” Suggests that there is a desire for power will be proposed through a PPA type agreement and the demand side energy savings would be proposed as blocks of demand reduction. Is that a correct characterization?

Answer: Per RFI, V.B.15, “CPS Energy is primarily interested in power purchase options but is open to other possible arrangements or structures.”

For demand side solutions, CPS Energy has not specified preferred pricing structure for the RFI.

58. Is CPS open to an Energy Storage Lease EaaS ( Energy as a Service) structure?

Answer: For this RFI, CPS Energy is open to exploring ideas including reviewing information on Energy Storage Lease structures.

59. Are stipulated savings/reductions acceptable for the blocks of demand side energy savings? Or is an M&V protocol required?

Answer: A M&V protocol would be required for most demand side energy claimed savings. When applicable, CPS Energy follows they protocols laid out on the Texas TRM for energy efficiency savings. For demand response claimed savings, CPS Energy will follow M&V protocols and applied the findings as deemed savings.

60. Is the expectation that the systems supplied will need to actively communicate with the grid operator or CPS Energy distribution controllers? If so, are there any particular protocols that are preferred?

Answer: For this RFI, CPS has limited specification requirements. CPS Energy is leaving it to the Respondents to propose information on their best solutions. Shortly after reviewing information from this RFI, CPS Energy plans to issue an RFP that will have more defined specifications.



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61. Where can we obtain customer demographic/stratification data on the underserved customer segments?

Answer: For this RFI, CPS Energy is leaving it to the Respondents to propose information on their best solutions.

62. If a company wishes to propose both Supply-Side and Demand-Side Solution, should they submit two separate responses?

Answer: It would not be necessary to submit two separate responses, but please clearly indicate which part of the response is for a Supply-Side solution and which is for a Demand-Side solution, along with the associated stand-alone pricing for the respective solution.

63. Are there any minimum project sizes with respect to Capacity and Energy?

Answer: For this RFI, there is no specification on size with respect to Capacity and Energy. Shortly after reviewing information from this RFI, CPS Energy plans to issue an RFP that will have more defined specifications.

64. Is the expectation that the demand side programs would be administered by CPS (customer acquisition/administration) or by the proposer and presented as blocks of reduction?

Answer: Traditionally, CPS Energy and our partner worked together in program delivery.

65. As for indicative pricing request, what is the desired formatting of the pricing? (e.g. \$/MW supplied, \$/MW reduction)

Answer: CPS Energy would look to the respondent to provide all relevant details related to energy/demand, savings and costs.

66. Are there any existing or planned incentives from CPS for demand reduction that could material figure into buying down the cost of the implementations.

Answer: Yes, CPS Energy does offer incentives for demand reduction. For this RFI, CPS Energy does not specify program or incentive design. CPS Energy is looking to the respondent to provide program ideas and design.

67. Are there any existing demonstration projects that can add understanding and color to our appreciation for CPS' objectives and approaches.



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Answer: Our website has a wealth of knowledge on information about the *Flexible* Path. More information about STEP programs can be found at <https://www.sanantonio.gov/sustainability/Energy/SaveForTomorrow>

68. COMPANY is interested in proposing improvements to some of the CPS existing GT and CC units. To facilitate, can CPS provide a current operational profile for these units (Lee East & West peaking, Rio Nogales CC)?
- a. Hours/year, hours/start, typical operation - daily, seasonal
  - b. Heat rates
  - c. Ramp rates
  - d. Operation determined by?
    - i. Serving CPS load & AS
    - ii. ERCOT Energy, AS & SCED/RUC
  - e. Operating constraints from
    - i. Fuel supply
    - ii. NOx & CO emissions permits

Answer: Operational details of CPS Energy's generation fleet will not be shared as part of this RFI.

69. Would CPS recognize any benefit from Ancillary Services provided by one of its own resources?

Answer: Respondent is encouraged to discuss all potential benefits of their Solutions in the RFI Response.

70. COMPANY and CPS currently have a Non-Disclosure Agreement together. Do the terms of this NDA supersede the confidentiality provisions of this RFI?

Answer: CPS Energy cannot provide legal advice. Please seek guidance from your legal counsel.

71. Is it possible to clarify how transmission fees, if any, will be incorporated into the overall power delivery pricing structure for a proposed project? Or, in evaluating a proposed project, will CPS consider only the cost of generation?

Answer: When evaluating proposed projects, CPS Energy will consider all potential costs to CPS Energy and its customers.

**Please refer to General Statement.**

72. Would CPS consider investing or part ownership in future projects stemming from this RFI?



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Answer: Please see answer to Question 23 and General Statement.

73. Can you tell us if there is a minimum size or maximum size for a storage project?

Answer: See answer to question 65.

74. Is standalone storage preferred or paired storage?

Answer: See answer to question 3.

75. How many total MW of storage is CPS Energy looking to procure through their RFP?

Answer: For this RFI, CPS Energy has no specified total capacity. Shortly after evaluating responses to this RFI, CPS Energy plans to issue an RFP that would have more defined specifications on desired capacities.

76. We have both distribution and transmission level projects, is there a preference?

Answer: There is no preference specified for this RFI. Shortly after evaluating responses to this RFI, CPS Energy plans to issue an RFP that would have more defined specifications on volumes of transmission and distribution projects.

77. What is the preferred duration of the storage project?

Answer: See answer to question 4.

78. Does CPS Energy have a preference for location? South Zone (closer to load) or West Zone (closer to wind and solar supply)? Can you provide even more granular guidance in terms of node or specific location?

Answer: See answer to question 1.

79. What type of flexibility is CPS Energy looking for? For instance how many cycles a day a storage asset can provide?

Answer: See answer to question 4.

80. What is the preferred transaction start date?

Answer: See answer to question 6.

81. What tenors is CPS Energy looking for in a potential transaction?

Answer: See answer to question 2.



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82. Are you looking for just a tolling product or is CPS Energy interested in energy and A/S products on a stand alone basis?

Answer: See answer to question 2.

83. If a respondent proposes a pure solar solution, does CPS have any preference about time of day of delivery that respondent should take into account when laying out the solar arrays relative to the sun in order to shift the peak output to an earlier or later time of the day?

Answer: For this RFI, CPS Energy has not specified this information. Shortly after reviewing responses for this RFI, CPS Energy plans to issue an RFP that will have more defined specifications. Information from this RFI will help CPS Energy further refine specifications for an RFP.

84. If a respondent proposes a solar/battery storage solution, during what hours would CPS want to see the stored energy released?

Answer: See answer to question 85.

85. If a respondent proposes a solar/battery storage solution, would CPS prefer a single PPA rate or separate rates for directly transmitted solar versus solar energy that is stored in batteries?

Answer: For this RFI we have not specified a pricing basis. Shortly after CPS Energy reviews responses to this RFI, we plan to issue an RFP that may have more defined specifications for rate structures and basis.

86. If a respondent proposes a solar/battery storage solution, does CPS have any scenario which would entail not releasing all of the stored energy each day? If so, would there be a rate for energy stored and not released and for released energy?

Answer: CPS Energy has not specified use cases or scenarios for this RFI.

87. When an RFP is issued, how long a response time will be established?

Answer: The answer to this question would be addressed in the RFP.

88. Once RFP responses are returned, what is the CPS average time between RFP due date and award date?

Answer: The answer to this question will be addressed in the RFP.

89. Will an RFP contain any minimum thresholds of respondent experience? If so, what are those thresholds?

Answer: For this RFI Q&A, CPS Energy is not discussing criteria for a future RFP. Details for an RFP will be influenced by information received in this RFI.



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90. Are any reports or analyses available regarding performance or other characteristics of the solar/battery installation made near the Southwest Research Institute? If so, are those available for respondent use in preparing an RFP response?

Answer: CPS Energy does not have information to share for the SWRI project as part of this RFI Q&A.

91. What voltages will be available for interconnection to provide power under the RFP to be issued? Is there a preferred interconnection voltage?

Answer: When CPS Energy issues an RFP, it will have a Q&A to address questions for the RFP document.

92. Will the RFP allow respondents to propose optional extension terms such as two terms at 5 years each that could be exercised at the end of the initial term of a PPA contract?

Answer: CPS Energy will review all information for this RFI. In section V.B.5 of the RFI, CPS Energy discusses preferred term ranges that would be sought in an RFP.

93. Would CPS consider interconnection at transmission line voltage? If so, are there any limitations with respect to transmission lines, voltages, etc.?

Answer: For this RFI, CPS Energy has not specified and transmission limitations or location preferences. CPS Energy plans to issue an RFP shortly after this RFI that would have more defined specifications for locations.

**Please refer to General Statement.**

94. Does CPS define FlexGen as a green diesel fueled generation? If not, what is FlexGen?

Answer: "FlexGen" or "flexible generation" is terminology CPS Energy uses to represent new and/or undetermined future resources that can help us on our journey of transforming our generation fleet to cleaner resources.



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**END OF QUESTIONS & ANSWERS**