



Filing Receipt

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Public Utility Commission of Texas
1701 N. Congress Avenue or P.O. Box 13326
Austin, Texas 78711-3326
512-936-7000
Web address: www.puc.texas.gov

Registration and Re-registration Form for Power Generation Companies (PGC) and Self-Generators

(In accordance with 16 Texas Administrative Code (TAC) § 25.109)

Part A – Type of Registration Applicable to Every Registrant

1. Type of registration

Check only one of the following.

- | | |
|---|---|
| <input checked="" type="checkbox"/> New power generation company (PGC) registration | <input type="checkbox"/> New self-generator registration |
| <input type="checkbox"/> Amendment of PGC registration | <input type="checkbox"/> Amendment of self-generator registration |
| <input type="checkbox"/> PGC re-registration | <input type="checkbox"/> Self-generator re-registration |
| <input type="checkbox"/> PGC compliance update | <input type="checkbox"/> Self-generator compliance update |

2. Amendments

If filing an amendment, check all applicable boxes and fill in only the sections of this form that are applicable to your amendment:

- | | |
|--|--|
| <input type="checkbox"/> Name change amendment | <input type="checkbox"/> Facility output capacity change |
| <input type="checkbox"/> Change in ownership/control | <input type="checkbox"/> New generating facility or unit of a current facility |
| <input type="checkbox"/> Registration relinquishment | <input type="checkbox"/> Other |

Registration number: _____

Provide a brief explanation of amendment:

3. Biannual renewal of registration – This box is not applicable until February 2024.

If filing a re-registration, fill in the box below if the registrant's information has not changed from the previous registration.

- ☐ No information has changed from the previous registration. The Affidavit is required to be completed and filed if this box is checked.

4. Compliance with Project No. 52796 – PGCs and self-generators already registered on, or that applied for registration before, April 26, 2023, must complete this box to come into compliance with 16 Texas Administrative Code (TAC) § 25.109 on or before June 1, 2023.

If filing a compliance update, provide the registrant's registration number and check the box below once the form has been completed.

Registration number: _____

☐ Registrant has completed the entire form, as applicable to its type of registration.

Part B – Registration Information Applicable to Every Registrant

1. Registrant

Legal business name: GAIA Solar, LLC

Business address: 105 Eastern Avenue, Suite 203

City: Annapolis	State: Maryland	ZIP: 21403
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Business email: legalnotices@sunraycer.com	Business phone: (410) 402-5505
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Physical address (i.e. not a P.O. box), if different than business address. If the physical address is the same as the business address, enter "N/A". A single physical address provided under this section may be used for the Primary and Secondary Emergency Contacts , as required by 16 TAC §25.109(c)(1)(B).

N/A

City:	State:	ZIP:
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2. Primary Emergency Contact Information

Name: Nathan Krieger	Title: Senior Vice President of Commercial
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Business address: 105 Eastern Avenue, Suite 203

City: Annapolis	State: Maryland	ZIP: 21403
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Email: nkrieger@sunraycer.com	Phone: (470) 834-5690
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3. Secondary Emergency Contact Information

Name: Ayesha Fareedi	Title: Senior Transmission & Interconnection Manager
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Business address: 105 Eastern Avenue, Suite 203

City: Annapolis	State: Maryland	ZIP: 21403
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Email: afareedi@sunraycer.com	Phone: 916-286-9875
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4. Regulatory Contact Information

Name: David Lilleflore	Title: Chief Executive Officer
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Email: dlilleflore@sunraycer.com	Phone: 410-948-3148
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Check the relevant box below indicating whether the registrant's regulatory contact is an internal staff member of the registrant.

☒ Yes, the registrant's regulatory contact is an internal staff member of the registrant.

☐ No, the registrant's regulatory contact is not an internal staff member of the registrant.

5. Description of the types of services provided by the registrant that relate to the generation of electricity

Solar power generation and storage.

6. For qualified facilities and exempt wholesale generators, provide as an attachment a copy of any Federal Energy Regulatory Commission (FERC) registrations

- ☐ Registrant is a qualified facility and has attached a copy of a FERC registration.
- ☒ Registrant is an exempt wholesale generator and has attached a copy of a FERC registration.
- ☐ Registrant is not a qualified facility or exempt wholesale generator.

Part C - Applicable to Registration of Power Generation Companies

7. Names and, if applicable, the Commission registration of the registrant's corporate parent companies (if parent company does not have a Commission registration then mark "N/A") (add additional pages as attachments as necessary)

Names of Corporate Parent: Sunraycer Renewables LLC	Type of Commission registration (if applicable): N/A
Names of Corporate Parent:	Type of Commission registration (if applicable):
Names of Corporate Parent:	Type of Commission registration (if applicable):

8. Names of the registrant's affiliates and affiliates of the registrant's corporate parent identified by name that buy and sell electricity at wholesale in Texas, sell electricity at retail in Texas, or is an electric cooperative or municipally owned utility in Texas (add additional pages as attachments as necessary)

Affiliate Name: Midpoint Solar, LLC	Type of Commission registration (if applicable): PGC
Affiliate Name:	Type of Commission registration (if applicable):
Affiliate Name:	Type of Commission registration (if applicable):

9. Interchange Project Number where registrant's Emergency Operation Plan is filed and Item Number of filing

Project Number: 53385

Item Number: 3551

Part D - Applicable to Every Registrant

AFFIDAVIT

(Must be notarized by a public notary)

STATE OF

Maryland

COUNTY OF

Anne Arundel

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BEFORE ME, the undersigned authority, on this day personally appeared the undersigned, who, after being duly sworn, stated on his or her oath that he or she is entitled to make this Affidavit, and that the statements contained below and in the foregoing are true and correct.

Check one of the following boxes:

☐ I am an authorized representative of the registrant, which is a **self-generator** and swear and affirm that either:

◆ (A) the company

(i) is not a power generation company; and

(ii) does not intend to generate electricity intended to be sold at wholesale; or

(B) if the company is a QF

(i) the company either does not sell electricity; or

(ii) provides electricity only to the purchaser of the facility's thermal output.

☒ I am an authorized representative of the registrant, which is a **power generation company** and swear and affirm that the company:

◆ (A) Generates electricity that is intended to be sold at wholesale;

(B) Does not own a transmission or distribution facility in this state other than an essential interconnecting facility, a facility not dedicated to public use, or a facility otherwise excluded from the definition of "electric utility" under 16 Texas Administrative Code § 25.5; and

(C) Does not have a certificated service area.

I swear and affirm that I have personal knowledge that none of registrant's principals (1) were principals of a Commission-regulated person whose license was revoked by Commission order when the person was principal, (2) were principals of any party registered with the Electric Reliability Council of Texas (ERCOT) whose standard form market participant agreement (SFA) was terminated by ERCOT for misconduct within the prior six months of when they were a principal, or (3) are otherwise prohibited by Commission order from acting as a principal of a Commission-regulated entity.

I swear and affirm that I have personal knowledge of the facts stated in the attached registration, that I am competent to testify to them, and that I have the authority to submit this registration form on behalf of the registrant. I further swear and affirm that all statements made in the registration form are true, correct and complete and that any substantial changes in such information will be provided to the Public Utility Commission of Texas in a timely manner. I swear and affirm that the registrant understands and will comply with all requirements of the applicable law and rules.

David Lileflore

Signature of Authorized Representative

DAVID Lileflore

Printed Name

GAIA Solar, LLC

Name of Registrant

Sworn and subscribed before me this

8th of April, 2025

Day

Month

Year

Christine Munnelly

Notary Public Signature

Notary Public in and for the State of

Maryland

CHRISTINE MUNNELLY
Notary Public - Maryland
Anne Arundel County
My Commission Expires
04/08/2028

Part E – Applicable to Every Registrant

Provide information for each generating unit. If more room is needed to list all generating units, attach additional copies of Part E.

All Registrants							Self-Generators Only
Generating Unit's Name	Physical Address of Unit	County of Unit	Interconnecting Transmission Service Provider	Power Region	Total Capacity Rating in MW	Type(s) of Generation*	MW Consumption of Co-Located Load
Gaia Solar	1075 NE CR 3020, Kerens, TX	Navarro	Oncor Electric Delivery Company LLC	ERCOT	144.02	Solar	
Gaia Storage	1075 NE CR 3020, Kerens, TX	Navarro	Oncor Electric Delivery Company LLC	ERCOT	78.81	Storage	

*i.e., biomass, wind, geothermal, solar, hydro, nuclear, landfill gas, energy storage, hydrogen, diesel, coal, natural gas, other (provide an explanation)

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

GAIA Solar, LLC

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Docket No. EG25-____-000

**NOTICE OF SELF-CERTIFICATION OF
EXEMPT WHOLESALE GENERATOR STATUS OF
GAIA SOLAR, LLC**

Pursuant to Section 1266 of the Public Utility Holding Company Act of 2005¹ and section 366.7(a) of the regulations of the Federal Energy Regulatory Commission (“Commission”),² GAIA Solar, LLC (“GAIA”) hereby submits this notice of self-certification of its status as an exempt wholesale generator (“EWG”), as defined in section 366.1 of the Commission’s regulations.³ In support of this notice, GAIA states as follows:

I. CORRESPONDENCE AND COMMUNICATIONS

All communications and correspondence regarding this notice should be sent to the following persons who are authorized to receive service:

Tyler Hall
Vice President, Legal
Sunraycer Renewables LLC
105 Eastern Avenue, Suite 203
Annapolis, MD 21403
Tel: (410) 402-5505
Email: thall@sunraycer.com

Chimera N. Thompson
Kimberly B. Frank
K&L Gates LLP
1601 K Street, NW
Washington, DC 20006
Tel: (202) 778-9000
Email: chimera.thompson@klgates.com
kimberly.frank@klgates.com

II. DESCRIPTION OF GAIA

GAIA is a Delaware limited liability company with its principal place of business in

¹ Energy Policy Act of 2005, §§ 1261-77, Pub. L. No. 109-58, 119 Stat. 594 (2005).

² 18 C.F.R. § 366.7(a) (2025).

³ *Id.* § 366.1.

Annapolis, Maryland. GAIA is developing, and will own and operate, an approximately 143.2 megawatt (“MW”) (nameplate) solar-powered electric generating facility and a co-located 78.81 MWh battery energy storage system (“BESS”), to be located in Navarro County, Texas (the “Facility”). The Facility will include limited interconnection facilities necessary to effectuate wholesale power sales, and will interconnect with the transmission system owned by Oncor Electric Delivery Company, LLC within the Electric Reliability Council of Texas, Inc. (“ERCOT”). The Facility is expected to be placed in service on May 23, 2025.

GAIA Solar, LLC is a wholly owned subsidiary of Sunraycer Assets I LLC, a Delaware limited liability company. Sunraycer Assets I LLC is a wholly owned subsidiary of Sunraycer HPS Borrower LLC, which in turn, is a wholly owned subsidiary of Sunraycer HPS Parent LLC, which in turn, is a wholly owned subsidiary of Sunraycer Renewables LLC, a Delaware limited liability company. Sunraycer Renewables LLC is a wholly owned subsidiary of Sunraycer Holdings LLC, a Delaware limited liability company.

III. REPRESENTATIONS REGARDING EXEMPT WHOLESALE GENERATOR STATUS

In accordance with the Commission’s regulations, GAIA makes the following representations demonstrating that it meets the definition of an EWG under Section 366.1 of the Commission’s regulations:

1. GAIA will be engaged directly, or indirectly through one or more affiliates as described in Section 366.1 of the Commission’s regulations, and exclusively in the business of owning or operating, or both owning and operating, all or part of one or more eligible facilities and selling electric energy at wholesale.⁴

⁴ The Commission has held that a BESS “can qualify as an ‘eligible facility’ for purposes of determining whether [an entity that owns or operates such a storage system] meets the requirements of EWG status” where such entity “will [own and/or] operate the [storage system] in such a manner that it will be engaged directly and exclusively in selling electric energy at wholesale.” *AES ES Westover, LLC*, 131 FERC ¶ 61,008, at PP 5-7 (2010). In addition, several entities that own and operate generation plus battery storage facilities have previously self-certified their EWG status and

2. The Facility is an “eligible facility” because it will (i) be used for the generation of electric energy exclusively for sale at wholesale and (ii) include only those interconnecting transmission facilities that are necessary to effect a sale of electric energy at wholesale.
3. No rate or charge for, or in connection with, the construction of the Facility, or for electric energy produced by the Facility (other than any portion of a rate or charge which represents recovery of the cost of a wholesale rate or charge), was in effect under the laws of any state on October 24, 1992. Therefore, no determinations by a state commission are necessary for this self-certification to become effective.
4. There are no lease arrangements through which GAIA will lease the Facility to a public utility company or any other party.
5. GAIA will not sell electricity at retail to any customer.
6. No portion of the Facility will be owned or operated by an electric utility company that is an affiliate or associate company of GAIA, as defined in section 366.1 of the Commission’s regulations other than an affiliate or associate company that is an EWG.

IV. OTHER POTENTIAL INCIDENTAL ACTIVITIES

In connection with operating the Facility, GAIA may engage in the following incidental activities that the Commission has found to be permissible:

- the sale of ancillary services;⁵
- the resale or reassignment of excess transmission capacity;⁶
- the purchase and sale of congestion revenue rights needed to operate the Facility;⁷

the Commission has allowed the EWG status of such entities to become effective by operation of 18 C.F.R. § 366.7(a). *See, e.g., AES Lawa’i Solar, LLC*, Notice of Effectiveness of Exempt Wholesale Generator Status, Docket No. EG19-74-000 (issued June 6, 2019); *AES Lawa’i Solar, LLC*, Notice of Self-Certification of Exempt Wholesale Generator Status, Docket No. EG19-74-000 (filed Mar. 15, 2019) (self-certifying EWG status of the owner and operator of a photovoltaic solar power generation facility with an approximate capacity of 28 MW (direct current), combined with a 100 MWh battery storage system direct current, coupled to a 20 MW (alternating current) power conversion system in Hawaii).

⁵ *See, e.g., Duke Energy Oakland LLC*, 83 FERC ¶ 61,304, at pp. 62,251-52 (1998); *Sithe Framingham LLC*, 83 FERC ¶ 61,106, at p. 61,504 (1998).

⁶ *See, e.g., Compañía Hidroeléctrica Doña Julia S. De R.L.*, 85 FERC ¶ 61,336, at pp. 62,317-18 (1998); *CNG Power Servs. Corp.*, 71 FERC ¶ 61,026, at pp. 61,103-04 (1995).

⁷ *See Duquesne Power, L.P.*, 106 FERC ¶ 61,104, at PP 6-7 (2004).

- acquiring or trading emission allowances consistent with the Commission's limitation that an EWG may engage in such trading so long as the emission allowances were originally obtained in the normal course of operating the Facility;⁸
- engaging in project development and financing activities associated with the Facility, including but not necessarily limited to due diligence; site investigations; feasibility studies; preliminary design and engineering; licensing and permitting; negotiation of asset and land acquisitions; negotiation of contractual commitments with lenders, equity investors, governmental authorities, and other project participants; negotiation of power sales contracts or hedge agreements; equipment purchases; fuel supply; engineering, construction, interconnection, and related matters; and preparation and submission of bid proposals;⁹
- the sale of "green" power certificates or credits consistent with the Commission's limitation that an EWG may sell such certificates or credits where they are associated with power produced by the Facility;¹⁰ and
- other activities incidental to the sale of electric energy at wholesale that are consistent with the Commission's EWG precedent.

V. STATE COMMISSION NOTIFICATION

As required by section 366.7(a) of the Commission's regulations, a copy of this notice is concurrently being filed with the Public Utility Commission of Texas, which is the state regulatory authority in the state in which the Facility will be located.

⁸ See *UGI Dev. Co.*, 89 FERC ¶ 61,192, at pp. 61,587-88 (1999).

⁹ See *Empresa Valle Hermoso, S.A.*, 72 FERC ¶ 61,306, at p. 62,288 (1995).

¹⁰ See *Madison Windpower, LLC*, 93 FERC ¶ 61,270, at p. 61,871 (2000).

VI. CONCLUSION

For the foregoing reasons, GAIA satisfies the requirements for EWG status and respectfully requests that the Commission accept its notice of self-certification of EWG status.

Respectfully submitted,

/s/ *Chimera Thompson*

Chimera Thompson
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1601 K Street, N.W.
Washington, DC 20006
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Tel: (202) 778-4371

Dated: March 13, 2025