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9 SHANGHAI ELECTRIC POWER JAPAN CO., LTD. and
10 TERRA ENERGY, INC.

**BEFORE THE PUBLIC AUDITOR
PROCUREMENT APPEALS
TERRITORY OF GUAM**

11 IN THE APPEAL OF

12 SHANGHAI ELECTRIC POWER
13 JAPAN CO., LTD. and TERRA
14 ENERGY, INC.,

Appellants.

Appeal No. OPA-PA-17-008

**EXHIBIT LIST OF SHANGHAI
ELECTRIC POWER JAPAN CO., LTD.
and TERRA ENERGY, INC.**

15 The Appellants Shanghai Electric Power Japan Co., Ltd. and Terra Energy, Inc.
16 ("SEPJ") submit the following as their Exhibit List.

17 SEPJ assumes that all documents in the procurement record are admissible if
18 relevant to the issues on this appeal, and may be referenced by the parties as necessary
19 at the Hearing. The following exhibits are submitted for the convenience of the SEPJ
20 witnesses, the Public Auditor, the Hearing Officer, and the opposing parties. The
21 relevant portions of certain exhibits have been highlighted.

EXHIBITS

Exhibit No. Description

- 24 1. Excerpt from Amendment IV to IFB
- 25 2. Email from John J. Cruz, Jr. dated May 31, 2017
- 26 3. Excerpt from draft Power Purchase Agreement ("PPA") between GPA
27 and Hanwha dated June 19, 2017

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4. CCU Resolution No. 2017-25 dated June 6, 2017
5. Agenda of CCU Board Meeting of July 25, 2017
6. Hanwha Site 1 Micro Grid Operation Price for Site 1
7. Hanwha Site 2 Micro Grid Operation Price for Site 2
8. SEPJ Micro Grid Operation Price for Site 1
9. SEPJ Micro Grid Operation Price for Site 2
10. KEPCO Micro Grid Operation Price for Site A
11. KEPCO Micro Grid Operation Price for Site B
12. Excerpt from IFB (page 1 of Commercial Terms & Conditions)
13. Excerpt from IFB (General Terms and Conditions)
14. Excerpt from KEPCO letter dated July 29, 2017
15. Excerpt from Technical Qualification Proposal Requirements of IFB
16. Excerpt from Amendment II to the IFB
17. Letter from GPA to KEPCO dated February 3, 2017
18. Letter from KEPCO to GPA dated February 6, 2017
19. Priced Proposal Evaluation
20. Excerpt from Amendment IX to IFB
21. Excerpt from Abstract of Bids regarding SolarCity
22. Excerpt from Amendment II to IFB
23. Document re LEAC from GPA website
24. Excerpt from Energy Dictionary regarding avoided cost
25. Excerpt from Independent Energy Producers Association regarding avoided cost
26. FERC definition of avoided cost
27. CFR definition of avoided cost
28. PUC Order dated June 11, 2012
29. GPA Summary of renewable energy prices

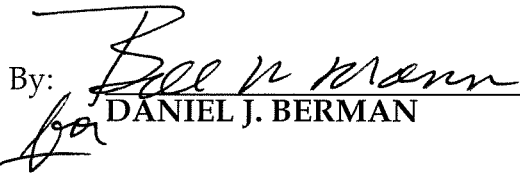
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- 30. PUC Order dated February 26, 2013
- 31. Curriculum Vitae of Dale Gauthier, PE
- 32. Any exhibit endorsed or offered by any other party.

DATED this 16th day of October, 2017.

Respectfully submitted,

BERMAN O'CONNOR & MANN
Attorneys for Appellants
*SHANGHAI ELECTRIC POWER JAPAN CO.,
LTD. and TERRA ENERGY, INC.*

By: 
DANIEL J. BERMAN