

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue
Implementation and Administration of California
Renewables Portfolio Standard Program.

Rulemaking 11-05-005
(Filed May 5, 2011)

**SUPPLEMENT TO
MARCH 2012 RPS PROGRESS REPORT
OF DIRECT ENERGY BUSINESS, LLC**

Direct Energy Business, LLC (“DEB”) submits the supplement to its March 2012 RPS Procurement Progress Report to document certain issues that it has identified with the template for said report:

- 1) DEB entered into transactions for RPS-eligible energy supply that includes pre-2011 deliveries that the company intends to allocate toward its RPS obligations for the 2011-2013 compliance period.
- 2) The format of the template for the aforementioned report does not allow for the reporting of the pre-2011 deliveries; therefore, DEB has not included the pre-2011 deliveries in the report.
- 3) As a result, the procurement position reflected in the report does not represent DEB’s actual compliance status.

DEB further notes that since the Commission has yet to address compliance issues in the rulemaking on the implementation of Senate Bill 2 (1X), it is premature for the Commission to require RPS-obligated entities to submit RPS compliance reports.

Respectfully submitted,



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February 28, 2012

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the attached *Supplement to March 2012 RPS Procurement Progress Report of Direct Energy Business, LLC* on all parties of record in proceedings *R.11-05-005* by serving an electronic copy on their email address of record and by mailing a properly addressed copy by first-class mail with postage prepaid to each party for whom an email address is not available.

Executed on February 28, 2012, at Woodland Hills, California.



Michelle Dangott