## **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)

## RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN OF TIGER NATURAL GAS, INC.

#### (PUBLIC)

In accordance with the April 5, 2012 Assigned Commissioner's Ruling, Tiger Natural Gas, Inc. ("TNG") hereby submits this Renewables Portfolio Standard ("RPS") Procurement Plan for the period of 2012-2022.

#### 1. Assessment of RPS Portfolio Supplies and Demand - § 399.13(a)(5)(A)

TNG currently serves a relatively small portion of the state's direct access (DA) load and, absent legislation further increasing the amount of load that is eligible for DA service, TNG does not expect that portion to change significantly during the ten-year planning period covered by this RPS Procurement Plan. TNG has been able to meet its pre-2011 RPS obligations and to make significant progress toward its RPS obligations for the 2011-2013 compliance period though a mix of bundled and REC-only transactions. Similarly, TNG plans to meet its future RPS obligations through a mix of bundled and REC-only transactions. The exact portfolio mix will depend the pricing that is available for various products, as well as the applicable portfolio category requirements; however, TNG anticipates that most if not all of the RPS-eligible energy

procures will be from in-state resources and/or resources that have their first point of interconnection with a California balancing authority. TNG does not expect to make any capital investments in new renewable generation capacity during the planning period; however, TNG will plan to comply with the minimum long-term contracting quota, which will indirectly support the development of such capacity.

## 2. Potential Compliance Delays - § 399.13(a)(5)(B)

Given the straightforward nature of TNG's RPS procurement strategy (see Section 1 above), TNG does not anticipate any compliance delays. If, however, fundamental barriers to the development of new renewable generation facilities that may be needed to meet the state's 33% RPS goal arise during the 2012-2022 planning period, any corresponding deficiency in the overall amount of RPS products could possibly result in compliance delays for TNG. If and when any such potential compliance delays become evident, TNG will identify those barriers and address in future RPS Procurement Plans the steps it plans to take to account for and minimize their impact on the company's RPS compliance.

# 3. Project Development Status Update - § 399.13(a)(5)(D)

TNG has no information to report in this section, as TNG has not entered into any contracts with facilities that are not yet in commercial operation.

### 4. Risk Assessment - § 399.13(a)(5)(F)

TNG has no information to report in this section, as TNG has not entered into any contracts with facilities that are not yet in commercial operation.

# 5. Quantitative Information - §§ 399.13(a)(5)(A), (B), (D) and (F)

TNG's forecast load and associated RPS obligations, as set forth in TNG's March 2012 RPS Procurement Progress Report, were calculated by assuming that TNG's current load will not change over the forecast period. The same assumption underlies the following quantitative information about TNG's forecast customer demand and RPS procurement attached hereto as Attachment A.

Respectfully submitted,

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#### Attachment A - TNG 2012 RPS Procurement Plan Quantitative Informaton

| RPS Procurement and Targets (MWh) | Actual Forecast |       |       |       |        |        |        |        |        |        |        |        |
|-----------------------------------|-----------------|-------|-------|-------|--------|--------|--------|--------|--------|--------|--------|--------|
|                                   | 2011            | 2012  | 2013  | 2014  | 2015   | 2016   | 2017   | 2018   | 2019   | 2020   | 2021   | 2022   |
| Annual Retail Sales               |                 |       |       |       | 26,700 | 26,700 | 26,700 | 26,700 | 26,700 | 26,700 | 26,700 | 26,700 |
| Annual Percentage Targets         | 20.0%           | 20.0% | 20.0% | 21.7% | 23.3%  | 25.0%  | 27.0%  | 29.0%  | 31.0%  | 33.0%  | 33.0%  | 33.0%  |
| Annual Procurement Targets (MWh)  |                 |       |       |       | 6,221  | 6,675  | 7,209  | 7,743  | 8,277  | 8,811  | 8,811  | 8,811  |
| Actual RPS Procurement            | 0               |       |       |       | 6,221  | 6,675  | 7,209  | 7,743  | 8,277  | 8,811  | 8,811  | 8,811  |
| Actual RPS Procurement Percentage | 0%              | 29.2% | 29.2% | 21.7% | 23.3%  | 25.0%  | 27.0%  | 29.0%  | 31.0%  | 33.0%  | 33.0%  | 33.0%  |