

**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
3 PHASES RENEWABLES**

(PUBLIC)

In accordance with the April 5, 2012 Assigned Commissioner's Ruling, 3 Phases Renewables (3PR) 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)

3PR 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, 3PR does not expect that portion to change significantly during the ten-year planning period covered by this RPS Procurement Plan. 3PR 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 through a mix of bundled and REC-only transactions. Similarly, 3PR plans to meet its future RPS obligations through a mix of bundled and REC-only transactions. The exact portfolio mix will depend on the pricing that is available for various products, as well as the applicable portfolio category requirements; however, 3PR 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. 3PR does not expect to make any capital investments in new renewable generation capacity during the planning period; however, 3PR 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 3PR's RPS procurement strategy (see Section 1 above), 3PR 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 3PR. If and when any such potential compliance delays become evident, 3PR 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)

3PR has no information to report in this section, as 3PR has not entered into any contracts with facilities that are not yet in commercial operation.

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

3PR has no information to report in this section, as 3PR 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)

According to the ACR, "The Commission's Energy Division Staff will hold a workshop for retail sellers and all interested parties to develop a methodology, inputs, and format, as needed, for reporting the quantitative information required... Once a methodology is developed it shall be incorporated in either the draft or final 2012 Procurement Plans, depending on the availability of the final methodology." No workshops have been held yet, and the methodology for quantitative information has not yet been developed. According, no quantitative analysis is provided at this time.

Respectfully submitted,



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