

**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)

**2012 CALIFORNIA RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN FOR  
CONSOLIDATED EDISON SOLUTIONS, INC.**

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Dated: May 23, 2012

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Pursuant to the April 5, 2012 Assigned Commissioner’s Ruling Identifying Issues and Schedule of Review for 2012 Renewables Portfolio Standard Procurement Plans Pursuant to Public Utilities Code Sections 399.11 Et. Seq. and Requesting Comments on New Proposals in Rulemaking 11-05-005 (“April 5 Ruling”), Consolidated Edison Solutions, Inc. (“ConEdison Solutions” or “CES”), respectfully submits its 2012 Renewables Portfolio Standard Procurement (“RPS”) Plan.

**I. Introduction**

ConEdison Solutions is registered as an Electric Service Provider in the State of California (ESP #1382, registered January 17, 2012). In the April 5 Ruling, all ESPs were directed to submit 2012 RPS Procurement Plans by May 23, 2012, as required by Section 365.1 of the Public Utilities Code and this Commission’s Decision 11-01-026. The April 5 Ruling also found that many of the requirements for Procurement Plans specified in Section 399.13(a)(5) of the Public Utilities Code do not apply to ESPs and directed ESPs to submit Procurement Plans containing the following information:

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

Provide a written description assessing annual or multi-year portfolio supplies and demand to determine the retail seller’s optimal mix of eligible renewable energy resources.

**6.2. Potential Compliance Delays - § 399.13(a)(5)(B)**

Describe in writing any potential issues that could delay RPS compliance, including inadequate transmission capacity and the relationship, if any, to deliveries and project development delays by, for example, permitting, interconnection, or other circumstances.

**6.3. Project Development Status Update - § 399.13(a)(5)(D)**

Provide a written status update on the development schedule of all eligible renewable energy resources currently under contract but not yet delivering generation.

**6.4. Risk Assessment - § 399.13(a)(5)(F)**

Provide a written assessment of the risk of failure to build or of construction delay for eligible renewable energy resource projects currently under contract.

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

In addition to the written descriptive responses to section 6.1 through 6.4, provide quantitative data, methodologies, and calculations relied upon to assess the retail seller's RPS portfolio needs and procurement net short.

**II. ConEdison Solutions' 2012 Procurement Plan**

As a newly registered ESP in California, ConEdison Solutions is still in the early stages of developing its business plans for the California market. ConEdison Solutions currently does not serve retail customers in California and has no immediate plans to begin serving customers in the near term. Accordingly, ConEdison Solutions has not undertaken specific RPS procurement activity as doing so would constitute a premature, speculative and imprudent business practice. ConEdison Solutions serves customers in many other states that have adopted direct access. Many of these states, including Connecticut, Delaware, Illinois, Maryland, Massachusetts, New Hampshire, New Jersey, and Pennsylvania, have RPS requirements that are applicable to ESPs. Therefore, ConEdison Solutions possesses the necessary capabilities and expertise to fully comply with the RPS program in California once it acquires customers and assumes an RPS procurement obligation.

Nevertheless, ConEdison Solutions, hereby submits the following information as required by Sections 6.1 through 6.5 of the April 5 Ruling.

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

Provide a written description assessing annual or multi-year portfolio supplies and demand to determine the retail seller's optimal mix of eligible renewable energy resources.

**Response:** As a newly-registered ESP, ConEdison Solutions currently has no customers in California and thus has not yet determined what its optimal portfolio mix should be. ConEdison Solutions has not conducted a formal projection of anticipated future load for the California market because the company has not finalized its California market entry business planning process. ConEdison Solutions and its affiliates ConEdison Energy and ConEdison Development have significant experience in procuring renewable energy through the purchase of Renewable Energy Credits, the development of renewable energy projects and the execution of power purchase agreements with renewable energy generation facilities. Accordingly, ConEdison Solutions has the requisite experience needed to fully comply with the California RPS

requirements once it acquires customers and assumes an RPS obligation. In future RPS Procurement Plans, ConEdison Solutions will provide a comprehensive description of its California load obligations, RPS procurement obligations, and RPS portfolio.

**6.2. Potential Compliance Delays - § 399.13(a)(5)(B)**

Describe in writing any potential issues that could delay RPS compliance, including inadequate transmission capacity and the relationship, if any, to deliveries and project development delays by, for example, permitting, interconnection, or other circumstances.

**Response:** ConEdison Solutions is currently assessing the California market in a number of areas as it determines how to best meet all of its various regulatory and legislative requirements going forward. The company intends to comply with its RPS requirements on a timely basis and is not currently aware of any potential issues that could delay its RPS compliance. Should such issues come to its attention in the future, they will be reported in subsequent RPS Procurement Plans filed by the company. As with any ESP or load serving entity, should there be a market-wide shortage of renewable energy supplies, ConEdison Solutions' ability to comply with the RPS requirements may be affected.

**6.3. Project Development Status Update - § 399.13(a)(5)(D)**

Provide a written status update on the development schedule of all eligible renewable energy resources currently under contract but not yet delivering generation.

**Response:** ConEdison Solutions currently has no California RPS-related eligible renewable energy resources under contract as it has not yet begun serving customers in California. Future Procurement Plans will respond to this question more fully.

**6.4. Risk Assessment - § 399.13(a)(5)(F)**

Provide a written assessment of the risk of failure to build or of construction delay for eligible renewable energy resource projects currently under contract.

**Response:** ConEdison Solutions currently has no California RPS-related eligible renewable energy resources under contract as it has not yet begun serving customers in California. Future Procurement Plans will respond to this question more fully.

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

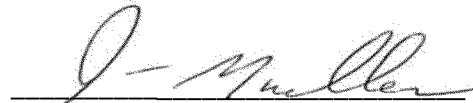
In addition to the written descriptive responses to section 6.1 through 6.4, provide quantitative data, methodologies, and calculations relied upon to assess the retail seller's RPS portfolio needs and procurement net short.

**Response:** ConEdison Solutions has no quantitative information or supporting calculations related to its RPS Procurement Plan as it is not currently serving customers in California and has no immediate future plans to begin serving customers. ConEdison Solutions has not prepared a formal projection of its expected future load in California as it has not finalized its market entry planning process.

**III. Conclusion**

Please accept the above submitted information as constituting ConEdison Solutions' 2012 California RPS Procurement Plan.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "J. Mueller", is written over a horizontal line.

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