

**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  
EDF INDUSTRIAL POWER SERVICES (CA), LLC**

In accordance with the April 5, 2012 Assigned Commissioner’s Ruling, EDF Industrial Power Services (CA), LLC (“EDF”) 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)**

EDF only recently registered with this Commission as an electric service provider (“ESP”),<sup>1</sup> and the company has yet to begin service to retail customers in California. EDF also has yet to determine what its optimal RPS portfolio mix should be. In other states where EDF is actively serving retail customers, the company maintains a portfolio that relies primarily on the procurement of tradable renewable energy credits in the markets in which it is active. These markets include Illinois and the ERCOT market in Texas. This is of course not determinative of the portfolio mix that EDF will ultimately develop in California, as it will need to satisfy the more detailed RPS requirements that exist in California. If and when EDF starts serving retail

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<sup>1</sup> EDF’s ESP registration only became effective on May 1, 2012.

customers in California, the company will provide a fuller description of its efforts and strategies for meeting its California RPS obligations in future RPS Procurement Plan filings.

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

EDF is still in the process of assessing the California market in a number of areas, including how best to meet all of the various regulatory and legislative requirements applicable to ESPs going forward. EDF intends to comply with all RPS requirements on a timely basis and currently is not aware of any potential issues that could delay its RPS compliance. Should such issues come to EDF's attention in the future, they will be identified and addressed in the company's subsequent RPS Procurement Plan filings.

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

EDF has no information to report in this section, as the company has not entered into any contracts with any renewable generation facilities, operational or otherwise, to serve load in California.

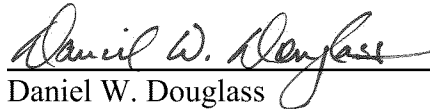
**4. Risk Assessment - § 399.13(a)(5)(F)**

EDF has no information to report in this section, as the company has not entered into any contracts with any renewable generation facilities, operational or otherwise, to serve load in California.

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

Since EDF does not currently serve any retail customers in California and has yet to enter into any contracts for RPS-eligible products to serve such load, it has no basis upon which to provide a quantitative analysis of the company's net procurement requirements or RPS portfolio needs.

Respectfully submitted,



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Daniel W. Douglass  
Gregory S. G. Klatt

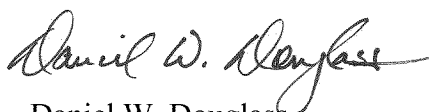
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May 23, 2012

**VERIFICATION**

I, Daniel Douglass, am counsel for the EDF Industrial Power Services (CA), LLC and am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing copy of the Renewables Portfolio Standard (“RPS”) Procurement Plan for EDF Industrial Power Services (CA), LLC, filed in R.11-05-005, are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

Executed on May 23, 2012, at Woodland Hills, California.



Daniel W. Douglass  
DOUGLASS & LIDDELL

Attorney for the  
EDF INDUSTRIAL POWER SERVICES (CA), LLC