

**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)

**CALPINE POWERAMERICA-CA, LLC's
UPDATED PROPOSED 2012 RENEWABLES PORTFOLIO
STANDARD PROCUREMENT PLAN**

(PUBLIC VERSION)

Jeffrey P. Gray
Olivia Para
Davis Wright Tremaine LLP
Suite 800
505 Montgomery Street
San Francisco, CA 94111-6533
Tel. (415) 276-6500
Fax. (415) 276-6599
Email: jeffgray@dwt.com

August 15, 2012

Attorneys for Calpine PowerAmerica-CA, LLC

**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)

**CALPINE POWERAMERICA-CA, LLC's
UPDATED PROPOSED 2012 RENEWABLES PORTFOLIO
STANDARD PROCUREMENT PLAN
(PUBLIC VERSION)**

I. INTRODUCTION

Pursuant to the procedural schedule set forth in the April 5 and August 2, 2012 Assigned Commissioner's Ruling,¹ Calpine PowerAmerica-CA, LLC ("CPA") submits this updated proposed 2012 Renewables Portfolio Standard ("RPS") Procurement Plan.²

**II. ASSESSMENT OF RPS PORTFOLIO SUPPLIES AND DEMAND
(§ 399.13(A)(5)(A))**

CPA has developed a ~~40~~ 20-year supply/demand forecast to identify its expected RPS compliance obligations and net RPS procurement requirements going forward.³ CPA serves a single customer and its forward demand forecast is based on its customer's historical load growth.

The forecast also identifies expected long-term contracting requirements and addresses optimal procurement for each of the three RPS content categories.

¹ *Assigned Commissioner's Ruling Identifying Issues and Schedule for Review of 2012 Renewables Portfolio Standard Procurement Plans Pursuant to Public Utilities Code Sections 399.11 et seq. and Requesting Comments on New Proposals* (R.11-05-005) at 30 (Ruling Paragraph 4); *Administrative Law Judge's Ruling (1) Adopting Renewable Net Short Calculation Methodology (2) Incorporating the Attached Methodology into the Record, and (3) Extending the Date for Filing Updates to 2012 Procurement Plans* (R.11-05-005) at 3 (Ruling Paragraph 1).

² CPA is concurrently filing a Motion for Leave to File its Confidential Updated Proposed 2012 Renewables Portfolio Procurement Plan Under Seal, which requests a Commission order granting leave to file the confidential version of Appendix A of CPA's Updated Proposed 2012 Renewables Portfolio Procurement Plan under seal.

³ Note: CPA's existing customer contract does not extend through the entire ~~40~~ 20 year forecast period. Accordingly, unless the customer contract is renewed/extended, or CPA obtains a new retail customer (or customers), CPA will not provide retail service throughout the entire forecast period.

With respect to procurement within the three RPS content categories, CPA expects to procure up to the maximum limits for Content Category 2 and 3 resources. To the extent CPA is unable to procure sufficient amounts of Content Category 2 resources (either because of regulatory uncertainty related to the acceptable structure for such transactions or the lack of a market for Content Category 2 resources), CPA would procure additional Content Category 1 resources.

Historically, CPA has procured RPS eligible resources through bilateral transactions with eligible resources that are operational and delivering generation. CPA expects to utilize this same approach going forward.

With respect to specific deliverability characteristics, such as, peaking, dispatchable, baseload, firm, and as-available capacity, CPA meets its deliverability needs using CAISO imbalance mechanisms.

Attached at Appendix A is CPA's quantitative analysis supporting the above assessment.

III. POTENTIAL COMPLIANCE DELAYS (§ 399.13(A)(5)(B))

CPA does not currently forecast any potential issues related to the lack of transmission capacity and/or project development delays that would delay RPS compliance. To mitigate potential delays in RPS compliance, CPA does not expect to execute any contracts with RPS eligible renewable resources that are not yet delivering generation.

IV. PROJECT DEVELOPMENT STATUS UPDATE (§ 399.13(A)(5)(D))

CPA does not expect to execute any contracts with RPS eligible renewable resources that are not yet delivering generation.

V. RISK ASSESSMENT (§ 399.13(A)(5)(F))

As discussed above in Sections III and IV, to mitigate risks associated with “failure to build” and construction delays, CPA does not expect to execute contracts with RPS eligible resources that are not fully operational with sufficient transmission to the grid.

VI. QUANTITATIVE INFORMATION (§ 399.13(A)(5)(A), (B), (D), AND (F))

See Appendix A.

/s/ Jeffrey P. Gray

Jeffrey P. Gray
Olivia Para
Davis Wright Tremaine LLP
Suite 800
505 Montgomery Street
San Francisco, CA 94111-6533
Tel. (415) 276-6500
Fax. (415) 276-6599
Email: jeffgray@dwt.com

August 15, 2012

Attorneys for Calpine PowerAmerica-CA, LLC

Appendix A

Public Version

Calpine Power America - CA, LLC

2012 RPS Procurement Plan (Includes Existing Contracts Only)

Procurement Targets	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Retail Sales (MW)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	1,025,715	1,035,973	1,046,332	1,056,796	1,067,364	1,078,037	1,088,818	1,099,706
Total Procurement Target (% of Retail Sales)	20%	20%	20%	22%	23%	25%	27%	29%	31%	33%	33%	33%
Category 1 (% of Total Procurement Target)	50%	50%	50%	65%	65%	65%	75%	75%	75%	75%	75%	75%
Category 2 (% of Total Procurement Target)	25%	25%	25%	20%	20%	20%	15%	15%	15%	15%	15%	15%
Category 3 (% of Total Procurement Target)	25%	25%	25%	15%	15%	15%	10%	10%	10%	10%	10%	10%
Total Procurement Target (MW)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	238,992	258,993	282,510	306,471	330,883	355,752	359,310	362,903
Category 1 (MW)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	155,345	168,346	211,882	229,853	248,162	266,814	269,482	272,177
Category 2 (MW)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	47,798	51,799	42,376	45,971	49,632	53,363	53,896	54,435
Category 3 (MW)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	35,849	38,849	28,251	30,647	33,088	35,575	35,931	36,290

Long Term Contracting Requirement	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Contracting Requirement (% of Retail Sales)	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%
Contracting Requirement (MW)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	2,564	2,590	2,616	2,642	2,668	2,695	2,722	2,749

Procurement Summary	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Carry Forwards (generated prior to 2011)	37,812	0	0	0	0	0	0	0	0	0	0	0
Carry Forwards Category 1 (MW)	37,812	0	0	0	0	0	0	0	0	0	0	0
Carry Forwards Category 2 (MW)	0	0	0	0	0	0	0	0	0	0	0	0
Carry Forwards Category 3 (MW)	0	0	0	0	0	0	0	0	0	0	0	0
Total Procurement (MW)	133,229	194,046	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000
Procurement Category 1 (MW)	83,229	194,046	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000
Procurement Category 2 (MW)	0	0	0	0	0	0	0	0	0	0	0	0
Procurement Category 3 (MW)	50,000	0	0	0	0	0	0	0	0	0	0	0
Total Applicable Procurement	171,041	194,046	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000
Net Position	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	-208,992	-228,993	-252,510	-276,471	-300,883	-325,752	-329,310	-332,903
Net Position %	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	-87%	-88%	-89%	-90%	-91%	-92%	-92%	-92%

SB_GT&S_0562518

2023	2024	2025	2026	2027	2028	2029	2030	2031	2032
1,110,703	1,121,810	1,133,028	1,144,358	1,155,802	1,167,360	1,179,033	1,190,824	1,202,732	1,214,759
33%	33%	33%	33%	33%	33%	33%	33%	33%	33%
75%	75%	75%	75%	75%	75%	75%	75%	75%	75%
15%	15%	15%	15%	15%	15%	15%	15%	15%	15%
10%	10%	10%	10%	10%	10%	10%	10%	10%	10%
366,532	370,197	373,899	377,638	381,415	385,229	389,081	392,972	396,902	400,871
274,899	277,648	280,424	283,229	286,061	288,922	291,811	294,729	297,676	300,653
54,980	55,530	56,085	56,646	57,212	57,784	58,362	58,946	59,535	60,131
36,653	37,020	37,390	37,764	38,141	38,523	38,908	39,297	39,690	40,087

2023	2024	2025	2026	2027	2028	2029	2030	2031	2032
0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%
2,777	2,805	2,833	2,861	2,890	2,918	2,948	2,977	3,007	3,037

2023	2024	2025	2026	2027	2028	2029	2030	2031	2032
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000
30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000
-336,532	-340,197	-343,899	-347,638	-351,415	-355,229	-359,081	-362,972	-366,902	-370,871
-92%	-92%	-92%	-92%	-92%	-92%	-92%	-92%	-92%	-93%


Procurement Summary By Compliance Period	Obligation	Purchases	Net Position	Net Position %
Compliance Period 1 (2011 - 2013)	██████████	395,087	██████████	██████████
Compliance Period 2 (2014 - 2016)	██████████	90,000	██████████	██████████
Compliance Period 3 (2017 - 2020)	1,275,615	120,000	-1,155,615	-91%

OFFICER VERIFICATION FORM

I am an officer of the reporting corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document 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.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 15, 2012 at Houston, TX.



Jennings Goodman - Vice President