

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue  
Implementation and Administration of the  
California Renewables Portfolio Standard  
Program

Rulemaking 11-05-005  
(Filed May 5, 2011)

**AUGUST 2012 PROVISIONAL CLOSING REPORT FOR THE CALIFORNIA  
RENEWABLES PORTFOLIO STANDARD 20% PROGRAM OF  
SIERRA PACIFIC POWER COMPANY (U 903-E)**

Pursuant to Decision (“D.”) 12-06-038 and the “Instructions” tab of the “Provisional 20% RPS Closing Report – Small” template, Sierra Pacific Power Company (“Sierra”) hereby respectfully submits this Provisional Closing Report for the California Renewables Portfolio Standard 20% Program (“Provisional Closing Report”). Although Sierra is no longer a California utility subject to the jurisdiction of the California Public Utilities Commission (“Commission”) as its former retail territory is now served by California Pacific Electric Company, LLC (“CalPeco” or “Liberty”)<sup>1</sup>, Sierra provides this Provisional Closing Report to “close the books” on the renewable procurement undertaken during the 20% renewables portfolio standard (“RPS”) program when it still owned the system.

As Sierra is no longer subject to Commission jurisdiction, it only recently learned of the submission requirements for the Provisional Closing Reports and therefore provides its Provisional Closing Report at this time. If there are questions concerning Sierra’s Provisional Closing Report, please contact the undersigned.

---

<sup>1</sup> D.10-10-017 approved the transfer of Sierra’s California service territory to CalPeco. Sierra makes this submission simply to assist Energy Division with the closing of the 20% program. Sierra does not concede jurisdiction to the Commission as it is no longer a public utility in California nor a retail seller as defined in Public Utilities Code Section 399.12(j).

Dated: August 23, 2012

Respectfully Submitted,



---

Jedediah J. Gibson  
Ellison, Schneider & Harris, L.L.P. 2600  
Capitol Avenue, Suite 400  
Sacramento, California 95816-5905  
Telephone: (916) 447-2166  
Facsimile: (916) 447-3512  
Email: [jjg@eslawfirm.com](mailto:jjg@eslawfirm.com)

Attorneys for Sierra Pacific Power  
Company

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 10, 2011)

**Sierra Pacific Power Company (U 903-E)**

PROVISIONAL CLOSING REPORT FOR CALIFORNIA RENEWABLES  
PORTFOLIO STANDARD 20% PROGRAM

23-Aug-12

Name: Thomas O'Brien  
Title: Sr. Financial Analyst  
Email: [tobrien@nvenergy.com](mailto:tobrien@nvenergy.com)  
Phone: 702-402-5453  
Fax: 702-402-5495  
Address: PO Box 98910 MS13/ D264  
Las Vegas, NV 89151-0001

# CALIFORNIA'S RENEWABLES PORTFOLIO STANDARD

## Provisional RPS 20% Closing Report Worksheet Instructions

1. D.12-06-038 requires Investor Owned Utilities (IOU), Multi-Jurisdictional Utilities (MJU), Electric Service Providers (ESP), and Community Choice Aggregators (CCAs) to file a Closing Report that calculates RPS procurement from 2003-2010. The Closing Report spreadsheets are automated to calculate a retail seller's net deficit/surplus figure for compliance years 2003-2010 compliance years. Parties may refer to Commission Decision D.12-06-038 for additional details relating to the calculations within the closing report spreadsheet.
2. Any retail seller seeking confidentiality protection for the Closing Report should file a declaration. Confidentiality requests shall comply with the substantive and procedural rules set forth in D.06-06-066, as modified by D.08-04-023, the Commission's decision in its Confidentiality proceeding, Rulemaking (R.) 05-06-040, and any subsequent decisions issued in the same or successor proceeding. A declaration for confidentiality should identify all redacted information by tab name and cell reference, not to be confused with the line numbers provided in the Accounting tab.
3. RPS closing reports will be submitted to the Commission as specified below:

- a) Serve a public version on the service list in proceeding R.11-05-005. All pages must be legible: If reports need to be printed and scanned to be issued to the service list, please ensure that scanned documents are not blurry or distorted. Retail sellers are responsible for maintaining confidentiality when serving a redacted report. **No more than 35 CPUC e-mail addresses can be included in the same e-mail.**
- b) **File a confidential Excel version utilizing the locked spreadsheet with the Energy Division by e-mailing an electronic version to robert.blackney@cpuc.ca.gov and rpscompliance@cpuc.ca.gov. Please only submit Excel documents in .xls format (.xism and .xlsx files will NOT be accepted).**
- c) Send paper copies (confidential and public) to each of the assigned Administrative Law Judges (ALJs):

Regina M. DeAngelis and Anne E. Simon  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

d) **Do not send paper copies of the confidential version to anyone except the persons listed above, unless specifically requested.**

e) **All ESP's and CCA's must submit their RPS eligible contracts to the Commission (D.12-06-038). All contract documents should be provided in a digital pdf format. Please write all digital documents (pdf's) to a CD-R or DVD-R and mail to:**

Robert Blackney  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

4. Any questions regarding the completion and/or filing of this report can be directed to:  
Robert Blackney, Energy Division, California Public Utilities Commission:robert.blackney@cpuc.ca.gov, (415) 703-3072
5. Include the Title Page and fill out the following information:
  - a) Name of the retail seller serving the Closing Report
  - b) Date the Closing Report is being served
  - c) Contact information
6. Complete the Officer Verification Form in the format provided (Rule 1.11)
7. Yellow cells throughout the spreadsheet indicate user supplied data by the retail seller where and when applicable.
8. All data must be entered in MWh out to three decimal points to accurately account for retail sales, procurement and targets. The spreadsheet will display MWh throughout. Do not round any reporting data, as this may trigger some cells to turn red.
9. The spreadsheet included in this report has locked cells to ensure that the computation of the net deficit/surplus are accurately calculated and reported based on the data provided by the user. An unprotected version of the spreadsheet is also available by request.
10. Line #'s in the "Accounting" tab hyperlink to the "Calculations" tab, which provides additional information on the particular line item or section of the "Accounting" tab.

ACCOUNTING TAB

11. Begin by entering the relevant data for Lines 1-3, this will calculate the retail seller's Baseline Procurement Amount. Enter actual and forecasted sales figures to generate Incremental Procurement Targets (IPTs) and Annual Procurement Targets (APT's).

PROCUREMENT DETAIL TAB

12. Procurement Summary: *Total RPS Eligible Procurement* is differentiated by three categories, *existing and or signed contracts*, *short-listed/under negotiation/pending approval*, and *generic future contracts*. This section is populated by completing the Contract Detail section below. If the retail seller has entered into contracts that are short-term or with existing facilities but cannot meet its Annual Minimum Contracting Requirement, then deliveries from those contracts may not be used for compliance in any year (D.07-05-028).

a) *Annual Contracting Quota Requirement*: Retail sellers must enter into long-term contracts or contracts with new facilities for energy deliveries equivalent to at least 0.25% of that retail seller's prior years' retail sales, if it intends to use deliveries from short-term contracts and/or existing facilities, for RPS compliance purposes. Retail sellers must submit supporting documentation proving that the requirement has been met (i.e. a power purchase agreement for a long-term and/or new contract). If the retail seller has provided the power purchase agreement in a prior report or filing, it does not need to be provided again.

- Contracts are differentiated by Contract term-length and type (row 13:14). All deliveries from "long-term and/or new" are automatically entered into "Cumulative Surplus Contracting Quota Bank" (row 17).

13. RPS Eligible Procurement by Resource Type: This report must state the amount procured or projected to be procured from each resource type (D.05-07-039, Appendix A, D.06-10-050, page 47-48). This information is reported in rows 23:36 in the "Procurement Detail" tab and populated by completing the "Contract Detail" section.
14. Contract Detail: For each contract, enter actual and forecasted delivery data throughout the contract term. Do not assume that an expiring contract will be renegotiated.
- a) *Pre-2002 Contracts*: Input total annual deliveries by resource type
  - b) *2002-2010 Contracts*: List contracts by name, annual deliveries (MWh), project status, facility status and resource type.
  - c) *2005-2010 Contracts*: In addition to the requirements above, contracts from these years should be identified by term-length, short-term (less than 10 years) and long-term, as well as, by type, existing or new (defined below). 2005 and 2006 contracts that were signed prior to 2007 can be identified as "n/a" for this purpose.
    - "*Contract Length / Type*" (Column "X") Pursuant to D.07-05-028, starting in 2007, each RPS-obligated retail seller must, in order to be able to count for any RPS compliance purpose energy deliveries from contracts of less than 10 years' duration ("short-term") with RPS-eligible facilities that commenced commercial operation prior to January 1, 2005 ("existing facilities"), in each calendar year enter into contracts with facilities of at least 10 years' duration ("long-term") and/or short-term contracts with facilities that commenced commercial operation on or after January 1, 2005 ("new facilities") for energy deliveries equivalent to at least 0.25% of that retail seller's prior year's retail sales ("minimum quantity").
    - "*Contract Volume*" (Column "Y") Input the total MWh over the term of the contract identified in the power purchase agreement. Compliance with the minimum quota requirement is measured by contracted-for-energy, not deliveries.
15. Contract Execution Date: The date the contract was signed. If the parties signed on different dates, or there are contract amendments, use the most recent date signed.
16. If any procurement data for a specific contract differs from what is entered into the CEC-RPS-Track form for that year, the specific cell should be highlighted and the discrepancy should be explained.

**Spreadsheet user notes**

- a) Protecting confidential data: Individual cells may be formatted black, which will serve to redact info when excel file is converted to pdf. Select cell - click on "fill color" icon - choose black. Note: Once converted to pdf, additional steps are necessary to ensure redacted data is not accessible.
- b) Adding and/or deleting rows. The "Earmarking Detail" tab and "Procurement Detail" tab allows users to add to or delete rows. Within the desired section, highlight entire row(s) by selecting the excel row number(s) - right click and select "copy" - right click again and select "insert copied cells"



Provisional RPS 20% Closing Report: Procurement Detail


Input Required  
Forecasted Data  
Actual Data

Sierra Pacific Power Company (U 903-E)  
23-Aug-12

Procurement Summary	Actual MWh								
	2003	2004	2005	2006	2007	2008	2009	2010	2011
Total RPS Eligible Procurement	0	0	0	0	49,833	85,635	117,346	99,499	99,499
Existing and/or Signed Contracts	0	0	0	0	49,833	85,635	117,346	99,499	99,499
Annual Contracting Quota Requirement	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
RPS Contracts - long term and/or new facilities	N/A	N/A	N/A	N/A	0	0	0	0	0
RPS Contracts - short term with existing facilities	N/A	N/A	N/A	N/A	0	0	0	0	0
Surplus Contracting Quota Bank as of Prior Year	N/A	N/A	N/A	N/A	0	0	0	0	0
Current Year Banked MWh Available Annual Quota	N/A	N/A	N/A	N/A	0	0	0	0	0
Current Year Surplus Contracting Quota Bank	N/A	N/A	N/A	N/A	0	0	0	0	0
Minimum Annual Contracting Quota Shortfall	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

RPS Eligible Procurement by Resource Type	2003	2004	2005	2006	2007	2008	2009	2010	2011
Biomass	0	0	0	0	5,147	6,544	0	0	0
Digester Gas	0	0	0	0	0	0	0	0	0
Biodiesel	0	0	0	0	0	0	0	0	0
Landfill Gas	0	0	0	0	0	0	0	0	0
Mun Solid Waste	0	0	0	0	0	0	0	0	0
Geothermal	0	0	0	0	38,040	71,630	117,346	99,499	99,499
Small Hydro	0	0	0	0	3,776	3,625	0	0	0
Conduithydro	0	0	0	0	0	0	0	0	0
Solar PV	0	0	0	0	0	0	0	0	0
Solar Thermal	0	0	0	0	1,870	3,867	0	0	0
Wind	0	0	0	0	0	0	0	0	0
Ocean/Tidal	0	0	0	0	0	0	0	0	0
Fuel Cells	0	0	0	0	0	0	0	0	0

**TRECs**  
Refer to D-10-03-021 as modified by D-11-01-025 for detailed TREC rules.  
As of March 11, 2010, a transaction for purposes of compliance with the California renewables portfolio standard shall be considered a transaction that procures only renewable energy credits if that transaction either:  
a. Expressly transfers only renewable energy credits and not energy from the seller to the buyer; or  
b. Transfers both renewable energy credits and energy from the seller to the buyer but does not meet the Commission's criteria for considering a procurement transaction a bundled transaction for purposes of compliance with the California renewables portfolio standard. **TREC contracts with deliveries prior to March 11, 2010 and after March 11, 2010 should be listed as separate lines in this spreadsheet.**  
All deliveries from transactions described in subsection b above, made prior March 11, 2010 will be counted as bundled deliveries of both renewable energy credits and energy for purposes of compliance with the California renewables portfolio standard. **TREC contracts with deliveries prior to March 11, 2010 and after March 11, 2010 should be listed as separate lines in this spreadsheet.**  
The following types of transactions shall be treated as bundled transactions for purposes of compliance with the California renewables portfolio:  
a. Transactions in which energy is acquired from a generator certified as eligible for the California renewables portfolio standard and the generator has its first point of interconnection with the Western Electricity Coordinating Council interconnected transmission system with a California balancing authority; and  
b. Transactions in which energy is acquired from a generator certified as eligible for the California renewables portfolio standard and the energy from the transaction is dynamically transferred to a California balancing authority area.  
If the deliveries from a contract approved prior March 11, 2010 would put an LSE over the 25% usage limit in any year, the limit will not apply to the deliveries from the previously approved contract. Because the cap would be exceeded, however, no additional REC-only deliveries in excess of the usage limit would be allowed to count for RPS compliance in that year.

**Minimum Contracting Requirement**  
Starting in 2007, RPS obligated LSEs must, in each calendar year, enter into long-term contracts and/or short-term contracts with new facilities for energy deliveries equivalent to at least 0.25% of that LSE's prior year's retail sales ("minimum quantity") in order to be able to count energy deliveries from short-term contracts with existing RPS-eligible facilities, for any RPS compliance purpose. (D 07-05-028, R 06-02-012)  
**TRECs**  
D-10-03-021 as modified by D-11-01-025 concludes that TRECs do not contribute to and are not subject to the minimum quantity requirement. Therefore any TREC contracts executed (ESF) or approved (OUS) after March 11, 2010 should be classified as N/A in Column O.  
**Contract Term Definitions**  
- Long-term contract: At least 10 years' duration  
- Short-term contract: Less than 10 years' duration  
- New Facility: Commenced commercial operation on or after January 1, 2005  
- Existing Facility: Commenced commercial operation prior to January 1, 2005  
- N/A: Executed prior to 2007 TREC transaction after March 11, 2010

Contract Detail	2003	2004	2005	2006	2007	2008	2009	2010	Contract Status	Facility Status	Resource Type	Contract Length / Type	Contract Execution Date
<b>Pre-2002 Contracts</b>	0	0	0	0	29,477	40,748	63,783	44,774					
Biomass	0	0	0	0	5,147	6,544	0	0	executed - no op	online	Biomass		
Digester Gas	0	0	0	0	0	0	0	0			Digester Gas		
Biodiesel	0	0	0	0	0	0	0	0			Biodiesel		
Landfill Gas	0	0	0	0	0	0	0	0			Landfill Gas		
Mun Solid Waste	0	0	0	0	0	0	0	0			Mun Solid		
Geothermal	0	0	0	0	22,929	34,067	52,703	44,774	executed - no op	online	Geothermal		
Small Hydro	0	0	0	0	1,450	1,437	0	0	executed - no op	online	Small Hydro		
Conduithydro	0	0	0	0	0	0	0	0			Conduithydro		
Solar PV	0	0	0	0	0	0	0	0			Solar PV		
Solar Thermal	0	0	0	0	0	0	0	0			Solar Thermal		
Wind	0	0	0	0	0	0	0	0			Wind		
Ocean/Tidal	0	0	0	0	0	0	0	0			Ocean/Tidal		
Fuel Cells	0	0	0	0	0	0	0	0			Fuel Cells		
<b>2002 Contracts</b>	0	0	0	0	1,870	3,867	49,324	22,617	Contract Status	Facility Status	Resource Type	Contract Length / Type	Contract Execution Date
Nevada Solar One - total generation	0	0	0	0	31,509	45,344	49,324	22,617	executed - no op	online	Solar Thermal		
CA RPS Eligible Deliveries	0	0	0	0	1,870	3,867	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					
Project Name - total generation	0	0	0	0	0	0	0	0					
CA RPS Eligible Deliveries	0	0	0	0	0	0	0	0					





ContractDetail	2003	2004	2005	2006	2007	2008	2009	2010					
----------------	------	------	------	------	------	------	------	------	--	--	--	--	--

n/a - TRCC's Pre-June 1, 2010  
 n/a - TRCC's Post-June 1, 2010  
 n/a - Contractor's 2007  
 2007 long-term  
 2007 short-term new  
 2007 short-term existing  
 2008 long-term  
 2008 short-term new  
 2008 short-term existing  
 2009 long-term  
 2009 short-term new  
 2009 short-term existing  
 2010 long-term  
 2010 short-term new  
 2010 short-term existing

Bundled  
 TRCC  
 TRCC Approved through March 11, 2010

**Provisional RPS 20% Closing Report: Calculations**

RPS Baseline Inputs (MWh)		
Line#	Calculation	Notes
1	User supplied data	Pursuant to D.07-03-046, the <b>2003 Initial Baseline Procurement Amount</b> for the investor owned utilities (IOUs) is calculated using the following equation:
1a	User supplied data	<b>step 1)</b> 2001 CA sales (MWh) / 2001 System sales (MWh) = 2001 System's CA sales (%)
	User supplied data	<b>step 2)</b> 2001 System's CA sales (%) * 2001 System RPS-eligible procurement (MWh) = 2001 CA RPS-eligible procurement (MWh)
2		
3	User supplied data	<b>step 3)</b> 2001 CA RPS-eligible procurement (MWh) / 2001 CA sales (MWh) = 2001 CA RPS-eligible procurement (%)
4	<b>Baseline formula</b>	<b>step 4)</b> (2001 CA RPS-eligible procurement (%) * 2003 CA sales) + (1% * 2001 CA sales) = Initial Baseline Procurement Amount (MWh)

RPS Procurement and Targets (MWh)		
	Calculation	Notes
5	User supplied data	Annual Retail Sales
6	Data from "Procurement Detail" tab	In current and past years, this line should equal Total RPS Eligible Procurement in procurement detail tab
7	Prior year Line 7 + Line 8	
8	1% of line 5 {Y-1}	
9	Line 6 - Line 7	
10	Prior to 2010: Line 6 / Line 5 {Y-1} 2010 : Line 6 / Line 5	For all years prior to 2010, Actual Procurement Percentage equals prior year retail sales (current year RPS Procurement/Prior Year Retail Sales). For 2010 the calculation is 2010 Retail Sales/2010 RPS Procurement.

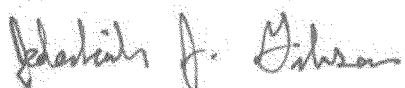
Surplus Procurement Bank		
	Calculation	Notes
11	Line 13 {Y-1}	
12	If Row 9 has a deficit, applies bank from	
13	Sum of lines 9 + 11	

Surplus/(Deficit) for RPS Compliance Years, Prior to 2011		
	Calculation	Notes
14	Line 9 (in year 2010 only)	Since this report tracks TREC Bank independent of Banking for Bundled Procurement, this cell computes a total excess/deficit figure for the entirety of the RPS 20% Program.

## ATTORNEY VERIFICATION FORM

I am an attorney for the reporting corporation herein, and am authorized to make this verification on its behalf. An officer of the corporation is absent from the county of Sacramento, wherein I have my office, and for that reason I make this verification. 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. The spreadsheet format used to file this RPS 20% Closing Report has not been altered from the version issued or approved by Energy Division except for the contents of this Attorney Verification Form. The information provided in this RPS 20% Closing Report adheres to the Commission's orders in D.12-06-038.

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

A handwritten signature in black ink, appearing to read "Jonathan J. Johnson". The signature is written in a cursive style with some loops and flourishes.

Executed on August 23, 2012 at Sacramento, CA