

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)

Liberty Power Holdings, LLC

2011 Preliminary Annual 33% RPS Compliance Report

Reporting progress towards meeting the procurement quantity requirements for California's RPS
Program

PUBLIC VERSION

December 28, 2012

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CALIFORNIA'S RENEWABLES PORTFOLIO STANDARD

2011 Preliminary Annual 33% RPS Compliance Reporting Instructions

Annual RPS compliance reports submitted by retail sellers include qualitative and quantitative elements, as required by the public utilities code 399.13 and Commission decisions, notably, Decision (D.) 11-12-020, D.11-12-052 and D.12-06-038. Specific procedural guidelines, reporting requirements and general explanations about the RPS compliance spreadsheet are detailed below. Any questions concerning RPS compliance matters should be directed to Robert Blackney robert.blackney@cpuc.ca.gov, (415) 703-3072.

Procedural Guidelines

1. D.12-06-038 requires Investor Owned Utilities (IOU), Multi-Jurisdictional Utilities (MJU), Electric Service Providers (ESP), and Community Choice Aggregators (CCAs) to submit an annual report on its compliance with the California RPS program. Refer to D.12-06-038 for additional details related to the calculations within the RPS compliance spreadsheet.
2. Any retail seller seeking confidentiality protection for information required by the Compliance 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.
3. RPS Compliance reports must 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. **The most current version of the service list can be found on the Commission's webpage :**
http://www.cpuc.ca.gov/service_lists/R1105005_79864.htm
 - b) **Submit 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 (.xlsm 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.**
4. Include the Title Page and fill out the following information:
 - a) Name of the retail seller serving the Compliance Report
 - b) Date the Compliance Report is being served
 - c) Contact information
5. Complete the Officer Verification Form in the format provided (Rule 1.11)

Narrative Reporting Requirements

Pursuant to Public Utilities Code Section 399.13(a)(3), each retail seller must include the following narrative information in each annual compliance report and in the final report for each compliance period:

1. The status of any necessary siting and permitting approvals from federal, state, and local agencies for those eligible renewable energy resources procured by the retail seller that have not yet attained their commercial on-line dates.
2. Identification of all procurement from eligible renewable energy resources located outside California and within the WECC during the period covered by the report.
3. Identification of all procurement of unbundled renewable energy credits (RECs) during the period covered by the report.
4. Recommendations to remove impediments to making progress toward achieving the renewable energy resources procurement requirements established by statute and implemented by Commission decision.

Each retail seller that is also an electrical corporation must, in addition to the four items set forth above, include the following narrative information in each annual compliance report and in the final report for each compliance period:

1. The current status and progress made during the prior year toward construction of, and upgrades to, transmission and distribution facilities and other electrical system components owned by that electrical corporation to interconnect eligible renewable energy resources and to supply the electricity generated by those resources to load. The narrative must specifically include, but is not limited to, the status of planning, siting, and permitting of transmission facilities by federal, state, and local agencies.

RPS Compliance Report Spreadsheet Instructions

General Instructions

1. Orange cells throughout the spreadsheet indicate data provided by the retail seller.
2. All data must be entered in megawatt-hours (MWh) out to three decimal points to accurately account for reported retail sales, quantity or renewable energy credits (RECs) and targets. The spreadsheet will display MWh throughout. Do not round any reporting data, as this may result in calculation errors.
3. The RPS compliance spreadsheet has locked cells to ensure accurate calculations. An unprotected version of the spreadsheet is available by request.
4. 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.

Accounting tab instructions

The Accounting tab is where the primary RPS compliance calculations are made.

Information from the 20% RPS Program: 2010 retail sales figure (cells C11:D11) is needed to calculate the long-term contracting requirement for the first compliance period. Enter the "Surplus/(Deficit) Carried Forward" value from the "Provisional 20% RPS Closing Report" (cells C12:D12). Pursuant to D.12-06-038, all CA retail sellers are required to file a Closing Report to calculate their surplus/(deficit) procurement amount from the 20% RPS program.

Annual RPS Procurement and Percentages: This section calculates retail seller's annual percentage target and procurement made towards those targets, prior to the application of specific compliance rules.

Procurement Quantity Requirement: This section calculates retail seller's Procurement Quantity Requirement (PQR) for a given compliance period, and shows the total amount of RECs applied to the PQR (data sourced from the "RECs Retired to meet PQR Detail" tab).

Portfolio Balance Requirements: This section calculates (i) whether the retail seller met the minimum procurement requirement for Category 1 RECs, and (ii) whether the retail sellers procured Category 3 RECs within the limit for each compliance period.

Excess Procurement Calculation: This section calculates the quantity and classification of RECs that qualify as for excess procurement. Retail sellers will classify any RECs that qualify as excess procurement (row 57) as either a Pre-June 1, 2010 REC, a Category 1 REC or a Category 2 REC (rows 58-60).

Excess Procurement Bank: This section shows the amount of excess procurement available for future RPS compliance, and a retail seller's application of excess procurement RECs towards a procurement quantity requirement, as applicable.

RPS Compliance Status: This section shows whether or not a retail seller met its procurement quantity requirement and the deficit amount, if any. Enforcement rules for RPS compliance have yet to be determined.

Deficit from the 20% Closing Report: This section how the retail seller will satisfy its net deficit from the 20% RPS Program, as reported in the Closing Report, if any.

Procurement Detail tab

Procurement Summary: This section differentiates the reported RECs procured by classification (i.e., pre-June 1, 2010, Category 1, Category 2 or Category 3) and calculates whether the retail seller met the long-term contracting requirements, if any short-term (< 10 yrs) contracts were executed in a compliance period.

Contract Detail: For each contract, enter actual and forecasted data (MWh) for each year 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) 2002-2020 Contracts: List contracts by CPUC ID Number, name, annual contracted deliveries (MWh), contract status, facility status, resource type, expected portfolio content category (i.e. Category 1, Category 2, etc.), contract length (i.e. short-term/long-term), whether contracted RECs are bundled/unbundled, the facility location (City and State), contract execution date, and the total MWh volume of the contact.
- c) "Contract Volume" (Column "W") Input the total MWh over the term of the contract identified in the power purchase agreement.
- d) Contract Execution Date: The date the original contract was signed. If the parties signed on different dates, or there are any contract amendments or modifications occurring after June 1, 2010, that increase the nameplate capacity or expected quantities of annual generation, or substitute a different renewable energy resource, use the most recent execution/signing date.
- e) If any data for a specific contract differs from what is reported to the CEC or included in an RPS Verification Report of the CEC for that year, the specific cell should be highlighted and the discrepancy should be explained.

RECs Retired and Applied to PQR

The information provided in this tab is largely the same as the information within the "Procurement Detail tab"; however, rather than including all RPS eligible RECS procured, retail sellers should provide only the MWh figures of RECs retired through WREGIS **and** applied to their Procurement Quantity Requirement.

	A	B	C	D	E	F
1						
2			RPS Compliance Report: Summary			
3						
4			2011 Annual Summary			
5			Report Date			
6						
7				2011		
8			RPS Summary Report		MWh	% of Total Retail Sales
9			Total Retail Sales	0	n/a	
10			Annual RPS Target	0	20.0%	
11			Total RPS Eligible RECs Procured	0	0.0%	
12			Total RPS Eligible RECs Retired for Compliance	0	0.0%	
13						
14			RPS Procurement Resource Mix			
15						
16				2011		
17			RPS Procurement		MWh	% of Total RPS Procurement
18			Biomass	0	0.0%	
19			Digester Gas	0	0.0%	
20			Biodiesel	0	0.0%	
21			Landfill Gas	0	0.0%	
22			Muni Solid Waste	0	0.0%	
23			Biopower Subtotal	0	0.0%	
24			Geothermal	0	0.0%	
25			Small Hydro	0	0.0%	
26			Conduit Hydro	0	0.0%	
27			Solar PV	0	0.0%	
28			Solar Thermal	0	0.0%	
29			Wind	0	0.0%	
30			Ocean/Tidal	0	0.0%	
31			Fuel Cells	0	0.0%	
32			Total RPS Eligible Procurement	0		
33						
34			Claimed Portfolio Content Category of RPS Procurement			
35						
36				2011		
37			Portfolio Content Category		MWh	% of Total RPS Procurement
38			RECs Procured from Contracts Executed Prior to June 1, 2010	0	0.0%	
39			RECs Procured from Category 1 Eligible Resources	0	0.0%	
40			RECs Procured from Category 2 Eligible Resources	0	0.0%	
41			RECs Procured from Category 3 Eligible Resources	0	0.0%	
42				0		
43						
44						

	A	B	C	D	E	F	G	H	I	J	K	L	M	
1														
2			RPS Compliance Report: Summary											
3			2011-13 Compliance Period											
4			Report Date											
5														
6														
7														
8			RPS Summary Report											
9				2011	2012	2013	CP TOTAL							
10			MWh	MWh	MWh	MWh	MWh	%	of Total Retail Sales					
11			Total Retail Sales	0	0	0	0	n/a						
12			Annual RPS Targets and Compliance Period Procurement Requirement	0	0	0	0	20.0%						
13			Total RPS Eligible RECs Procured	0	0	0	0	0.0%						
14			Total RPS Eligible RECs Retired	0	0	0	0	0.0%						
15			RPS Procurement Resource Mix											
16														
17			RPS Procurement											
18				2011	2012	2013	CP TOTAL							
19			MWh	MWh	MWh	MWh	MWh	%	of Total RPS Procurement					
20			Biomass	0	0	0	0	0.0%						
21			Digester Gas	0	0	0	0	0.0%						
22			Biodiesel	0	0	0	0	0.0%						
23			Landfill Gas	0	0	0	0	0.0%						
24			Muni Solid Waste	0	0	0	0	0.0%						
25			Biopower Subtotal	0	0	0	0	0.0%						
26			Geothermal	0	0	0	0	0.0%						
27			Small Hydro	0	0	0	0	0.0%						
28			Conduit Hydro	0	0	0	0	0.0%						
29			Solar PV	0	0	0	0	0.0%						
30			Solar Thermal	0	0	0	0	0.0%						
31			Wind	0	0	0	0	0.0%						
32			Ocean/Tidal	0	0	0	0	0.0%						
33			Fuel Cells	0	0	0	0	0.0%						
34			Total RPS Eligible Procurement	0	0	0	0							
35			Claimed Portfolio Content Category of RPS Procurement											
36														
37			Portfolio Content Category											
38				2011	2012	2013	CP TOTAL							
39			MWh	MWh	MWh	MWh	MWh	%	of Total RPS Procurement					
40			RECs Procured from Contracts Executed Prior to June 1, 2010	0	0	0	0	0.0%						
41			RECs Procured from Category 1 Eligible Resources	0	0	0	0	0.0%						
42			RECs Procured from Category 2 Eligible Resources	0	0	0	0	0.0%						
43			RECs Procured from Category 3 Eligible Resources	0	0	0	0	0.0%						
44			Total	0	0	0	0							

This amount represents total procurement quantity requirement

This amount represents quantity of RECs retired for this compliance period

A B C D E F G H I J K L M

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 2 Data Reported by:
 3 Liberty Power Holdings, LLC
 4 December 28, 2012
 5

6 **Compliance Summary and Charts**

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
10 Retail Sales (MWh)						28,467	28,467	28,467	28,467	28,467
11 Annual % Target	20.0%	20.0%	20.0%	21.7%	23.3%	25.0%	27.0%	29.0%	31.0%	33.0%
12 Annual RPS Target						7,117	7,686	8,255	8,825	9,394
13 Procurement Quantity Requirement									34,160	

15 **Resource Mix**

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
19 Total RPS Procurement	0	0	0	0	0	0	0	0	0	0
20 <i>Biomass</i>	0	0	0	0	0	0	0	0	0	0
21 <i>Digester Gas</i>	0	0	0	0	0	0	0	0	0	0
22 <i>Biodiesel</i>	0	0	0	0	0	0	0	0	0	0
23 <i>Landfill Gas</i>	0	0	0	0	0	0	0	0	0	0
24 <i>Muni Solid Waste</i>	0	0	0	0	0	0	0	0	0	0
25 <i>Biopower Subtotal</i>	0	0	0	0	0	0	0	0	0	0
26 <i>Geothermal</i>	0	0	0	0	0	0	0	0	0	0
27 <i>Small Hydro</i>	0	0	0	0	0	0	0	0	0	0
28 <i>Conduit Hydro</i>	0	0	0	0	0	0	0	0	0	0
29 <i>Solar PV</i>	0	0	0	0	0	0	0	0	0	0
30 <i>Solar Thermal</i>	0	0	0	0	0	0	0	0	0	0
31 <i>Wind</i>	0	0	0	0	0	0	0	0	0	0
32 <i>Ocean/Tidal</i>	0	0	0	0	0	0	0	0	0	0
33 <i>Fuel Cells</i>	0	0	0	0	0	0	0	0	0	0

A B C D E F G H I J K L M

35 **Portfolio Content Category Mix**

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	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Category 0 RECs (Pre-June 1, 2010)	0	0	0	0	0	0	0	0	0	0
Category 1 RECs	0	0	0	0	0	0	0	0	0	0
Category 2 RECs	0	0	0	0	0	0	0	0	0	0
Category 3 RECs	0	0	0	0	0	0	0	0	0	0

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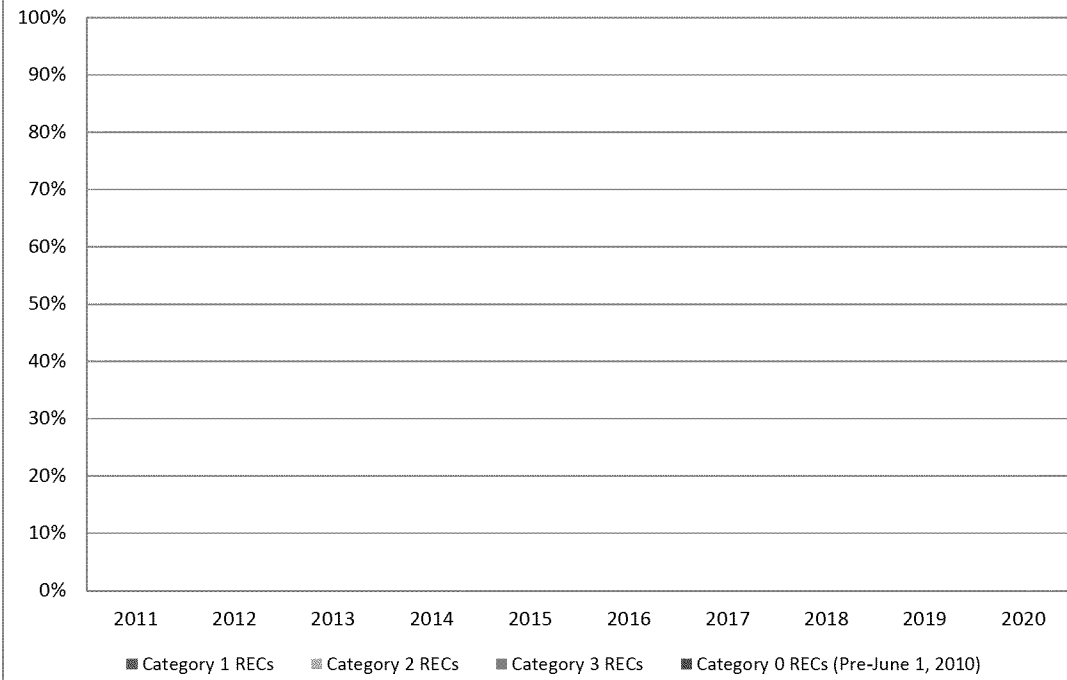
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Resource Mix Per Year



Portfolio Content Category Mix of RPS Procurement



	A	B	C	D	E	F	G	H	I	J	K	L	M
1													
2		Annual RPS Compliance Report: Compliance Status											
3		Data Reported by:											
4		Liberty Power Holdings, LLC											
5		December 28, 2012											
6													
7													
8													
9		Information from the 20% RPS Compliance Program (MWh)											
10		Actual											
11		Total Retail Sales in 201C											
12		Net Surplus/(Deficit) from 20% RPS Closing Report											
13													
14													
15													
16													
17		Annual RPS Procurement and Percentages (MWh)											
18													
19													
20													
21													
22													
23													
24													
25		Procurement Quantity Requirement (MWh)											
26													
27													
28													
29													
30													
31													
32													
33													
34													
35													
36													
37													
38		Portfolio Balance Requirements (MWh)											
39													
40													
41													
42													
43													
44													
45													
46													

A	B	C	D	E	F	G	H	I	J	K	L	M
47												
48		Compliance Period 1			Compliance Period 2			Compliance Period 3				
49	Excess Procurement Calculation (MWh)	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	
50	RECs applied to PQR from contracts executed prior to June 1, 2010		0			n/a				n/a		
51	Long-Term Category 1 RECs applied to PQR		0			n/a				n/a		
52	Short-Term Category 1 RECs applied to PQR		0			n/a				n/a		
53	Long-Term Category 2 RECs applied to PQR		0			n/a				n/a		
54	Short-Term Category 2 RECs applied to PQR		0			n/a				n/a		
55	Long-Term Category 3 RECs applied to PQR		0			n/a				n/a		
56	Short-Term Category 3 RECs applied to PQR		0			n/a				n/a		
57	Excess RECs Eligible for Banking		0			n/a				n/a		
58	Excess Pre-June 1, 2010 RECs		0			n/a				n/a		
59	Excess Category 1 RECs		0			n/a				n/a		
60	Excess Category 2 RECs		0			n/a				n/a		
61	Remaining Excess RECs Eligible for Banking and Requiring a Category Assignment		0			n/a				n/a		
62												
63												
64		Compliance Period 1			Compliance Period 2			Compliance Period 3				
65	Excess Procurement Bank (MWh)	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	
66	Pre-June 1, 2010 Bank		0			n/a				n/a		
67	Category 1 Bank		0			n/a				n/a		
68	Category 2 Bank		0			n/a				n/a		
69	Application of Pre-June 1, 2010 Banked RECs		0			n/a				n/a		
70	Application of Category 1 Banked RECs		0			n/a				n/a		
71	Application of Category 2 Banked RECs		0			n/a				n/a		
72	Cumulative Pre-June 1, 2010 Bank		0			n/a				n/a		
73	Cumulative Category 1 Bank		0			n/a				n/a		
74	Cumulative Category 2 Bank		0			n/a				n/a		
75												
76												
77		Compliance Period 1			Compliance Period 2			Compliance Period 3				
78	RPS Compliance Status (MWh)	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	
79	Additional RECs Needed to meet RPS Procurement Quantity Requirement					n/a				n/a		
80												
81												
82	Provisional 20% Closing Report	2011	2012	2013								
83	Deficit from Provisional 20% RPS Closing Report		(126)									
84	RECs applied to PQR from contracts executed prior to June 1, 2010		0									
85	Long-Term Category 1 RECs applied to PQR		0									
86	Short-Term Category 1 RECs applied to PQR		0									
87	Long-Term Category 2 RECs applied to PQR		0									
88	Short-Term Category 2 RECs applied to PQR		0									
89	Long-Term Category 3 RECs applied to PQR		0									
90	Short-Term Category 3 RECs applied to PQR		0									
91	Application of Pre-June 1, 2010 RECs to 20% Closing Report Deficit		0									
92	Application of Long-term Category 1 RECs to 20% Closing Report Deficit		0									
93	Application of Short-term Category 1 RECs to 20% Closing Report Deficit		0									
94	Application of Long-term Category 2 RECs to 20% Closing Report Deficit		0									
95	Application of Short-term Category 2 RECs to 20% Closing Report Deficit		0									
96	Application of Long-term Category 3 RECs to 20% Closing Report Deficit		0									
97	Application of Short-term Category 3 RECs to 20% Closing Report Deficit		0									
98	Cumulative Closing Report Deficit		(126)									
99												

CPIC ID	Original Contract Year	Entered Contracts Expiring Before 2020											Notes	Recurring Type			
		Contract Name															
		Contract Name															
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RPS Procurement Progress Report: Retirement Detail

Data Reported by:
 Liberty Power Holdings, LLC
 December 28, 2012

	Input Required
	Actual Data
	Forecasted Data

Retirement Summary (MWh)	Actual MWh		Forecasted MWh								
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	
Total Annual Retirements	0	0	0	0	0	0	0	0	0	0	0
Retirements from Long-Term Contracts Executed Prior to June 1, 2010	0	0	0	0	0	0	0	0	0	0	0
Retirements from Short-Term Contracts Executed Prior to June 1, 2010	0	0	0	0	0	0	0	0	0	0	0
Long-Term Category 1 RECs Retired	0	0	0	0	0	0	0	0	0	0	0
Short-Term Category 1 RECs Retired	0	0	0	0	0	0	0	0	0	0	0
Long-Term Category 2 RECs Retired	0	0	0	0	0	0	0	0	0	0	0
Short-Term Category 2 RECs Retired	0	0	0	0	0	0	0	0	0	0	0
Long-Term Category 3 RECs Retired	0	0	0	0	0	0	0	0	0	0	0
Short-Term Category 3 RECs Retired	0	0	0	0	0	0	0	0	0	0	0
Total RECs Retired per Compliance Period	0	0	0	0	0	0	0	0	0	0	0
Amount of Category 1 Short-Term RECs Excluded from PQR	0	0	0	0	0	0	0	0	0	0	0
Amount of Category 2 Short-Term RECs Excluded from PQR	0	0	0	0	0	0	0	0	0	0	0
Amount of Category 3 Short-Term RECs Excluded from PQR	0	0	0	0	0	0	0	0	0	0	0
Retired RECs Eligible for Compliance	0	0	0	0	0	0	0	0	0	0	0

RPS-Eligible Procurement By Resource Type	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Biomass	0	0	0	0	0	0	0	0	0	0
Digester Gas	0	0	0	0	0	0	0	0	0	0
Biodiesel	0	0	0	0	0	0	0	0	0	0
Landfill Gas	0	0	0	0	0	0	0	0	0	0
Muni Solid Waste	0	0	0	0	0	0	0	0	0	0
Biopower Subtotal	0	0	0	0	0	0	0	0	0	0
Geothermal	0	0	0	0	0	0	0	0	0	0
Small Hydro	0	0	0	0	0	0	0	0	0	0
Conduit Hydro	0	0	0	0	0	0	0	0	0	0
Solar PV	0	0	0	0	0	0	0	0	0	0
Solar Thermal	0	0	0	0	0	0	0	0	0	0
Wind	0	0	0	0	0	0	0	0	0	0
Ocean/Tidal	0	0	0	0	0	0	0	0	0	0
Fuel Cells	0	0	0	0	0	0	0	0	0	0

Retirement Detail	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	Resource Type	Expected Classification
Retirement from Pre-2002 Contracts	0	0	0	0	0	0	0	0	0	0		
Biomass	0	0	0	0	0	0	0	0	0	0	Biomass	
Digester Gas	0	0	0	0	0	0	0	0	0	0	Digester Gas	
Biodiesel	0	0	0	0	0	0	0	0	0	0	Biodiesel	
Landfill Gas	0	0	0	0	0	0	0	0	0	0	Landfill Gas	
Muni Solid Waste	0	0	0	0	0	0	0	0	0	0	Muni Solid Waste	
Geothermal	0	0	0	0	0	0	0	0	0	0	Geothermal	
Small Hydro	0	0	0	0	0	0	0	0	0	0	Small Hydro	
Conduit Hydro	0	0	0	0	0	0	0	0	0	0	Conduit Hydro	
Solar PV	0	0	0	0	0	0	0	0	0	0	Solar PV	
Solar Thermal	0	0	0	0	0	0	0	0	0	0	Solar Thermal	
Wind	0	0	0	0	0	0	0	0	0	0	Wind	
Ocean/Tidal	0	0	0	0	0	0	0	0	0	0	Ocean/Tidal	
Fuel Cells	0	0	0	0	0	0	0	0	0	0	Fuel Cells	

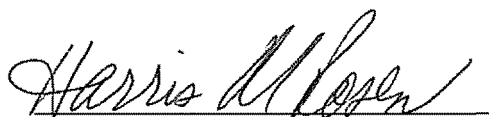
CPUC ID	Contract Year	Post 2002 Contract Detail	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	Resource Type	Expected Classification	Contract Length	Short Term Contract Eligibility
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				
		Contract Name	0	0	0	0	0	0	0	0	0	0				

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. The spreadsheet format used to file this compliance report has not been altered from the version issued or approved by Energy Division.

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

Executed on December 27, 2012 at Fort Lauderdale, Florida

A handwritten signature in cursive script, reading "Harris M. Rosen", written over a horizontal line.

Harris Rosen - VP, Law and General Counsel