

**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)

**2013 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN OF  
CONSOLIDATED EDISON SOLUTIONS, INC.**

In accordance with the May 10, 2013 Assigned Commissioner’s Ruling (“May 10 Ruling”), Consolidated Edison Solutions, Inc. (“ConEdison Solutions”) hereby submits this 2013 Renewables Portfolio Standard Procurement Plan (“RPS Plan”).

**I. Introduction**

ConEdison Solutions is registered as an Electric Service Provider (“ESP”) in the State of California (ESP #1382, registered January 17, 2012). In the May 10 Ruling, all ESPs were directed to submit 2013 RPS Procurement Plans by June 14, 2013, as required by Section 365.1 of the Public Utilities Code and this Commission’s Decision 11-01-026.<sup>1</sup> The May 10 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 and multi-year portfolio supplies and demand in relation to RPS requirements, the RPS program, and the RPS program’s overall goals to determine the retail seller’s optimal mix of eligible renewable energy resources.

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<sup>1</sup> The due date for 2013 RPS Procurement Plans was subsequently extended to June 28, 2013.

**6.2. 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.

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

Describe in writing any potential issues that could delay RPS compliance, including, but not limited to inadequate transmission capacity, delayed substation construction, financing, permitting, and the relationship, if any, to deliveries and project development delays.

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

Provide a written assessment of the risk in the RPS portfolio in relation to RPS compliance requirements.

**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 RPS procurement net short.

**6.6. Portfolio Optimization Strategy**

Based on the above assessment provided in response to sections 6.1 – 6.5, include an RPS Portfolio optimization strategy for the next ten years.

**II. ConEdison Solutions' 2013 RPS Procurement Plan**

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 6.6 of the May 10 Ruling.

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

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

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.

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

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.

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

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)**

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.

**6.6. Portfolio Optimization Strategy**

ConEdison Solutions currently has no California RPS-related eligible renewable energy resources under contract nor does it have any immediate plans to procure such resources as it has not yet begun serving customers in California. Future Procurement Plans will respond to this question more fully.

**III. Conclusion**

Please accept the above submitted information as constituting ConEdison Solution's 2013 California RPS Procurement Plan.

Respectfully submitted,

*Paul F. Mapelli*

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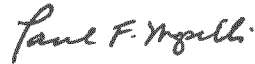
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Date: June 21, 2013

## VERIFICATION

I, Paul F. Mapelli, am Vice President, General Counsel and Secretary, for Consolidated Edison Solutions, Inc., and am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing 2013 Renewables Portfolio Standard Procurement Plan filed in Rulemaking 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 June 21, 2013, at Valhalla, New York.



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