

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

In accordance with the May 10, 2013<sup>2</sup> Assigned Commissioner’s Ruling, EDF Industrial Power Services (CA), LLC (“EIPS”) hereby submits this 2013 Renewables Portfolio Standard Procurement Plan (“RPS Plan”).

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

EIPS currently serves a relatively small portion of the state’s direct access (“DA”) load and, absent legislation further increasing the amount of load that is eligible for DA service, EIPS does not expect that portion to change significantly during the ten-year planning horizon covered by this RPS Plan. EIPS expects to meet its RPS obligations for the 2011-2013 compliance period through a mix of bundled and REC-only transactions. Similarly, EIPS plans to meet its future RPS obligations through a mix of bundled and REC-only transactions. The exact portfolio mix will depend on the pricing that is available for various products, as well as the applicable portfolio category requirements; however, EIPS anticipates that most if not all of the RPS-eligible energy procured will be from in-state resources and/or resources that have their first point of interconnection with a California balancing authority. EIPS does not expect to make any capital investments in new renewable generation capacity during the planning period;

however, EIPS will plan to comply with the minimum long-term contracting quota, which will indirectly support the development of such capacity.

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

EIPS has no information to report in this section, as EIPS has not entered into any contracts with facilities that are not yet in commercial operation.

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

Given the straightforward nature of EIPS's RPS procurement strategy (see Section 1 above), EIPS does not anticipate any compliance delays. If, however, fundamental barriers to the development of new renewable generation facilities that may be needed to meet the state's 33% RPS goal arise during the 2013-2033 planning period, any corresponding deficiency in the overall amount of RPS products could possibly result in compliance delays for EIPS. If and when any such potential compliance delays become evident, EIPS will identify those barriers and address in future RPS Procurement Plans the steps it plans to take to account for and minimize their impact on the company's RPS compliance.

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

EIPS has no information to report in this section, as EIPS has not entered into any contracts with facilities that are not yet in commercial operation.

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

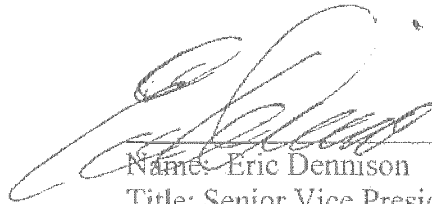
EIPS's actual and forecast customer demand and RPS supply is set forth in the spreadsheet attached hereto as Appendix A. EIPS's forecast load and associated RPS obligations were calculated by assuming that EIPS's current load will not change over the forecast period.

**6. Portfolio Optimization Strategy**

So as to minimize and control procurement costs while optimizing our RPS portfolio, EDF intends to procure the following RPS resources in the amounts indicated during the 20 year time frame covered by this plan:

- Portfolio Procurement Category (“PCC”) 1 resources in the minimum amounts required under 399.16(c)(1).
- PCC 3 resources in the maximum amounts allowed under § 399.16(c)(2).
- PCC 2 resources in such amounts as needed to cover any remaining RPS requirements.

Respectfully submitted,



Name: Eric Dennison  
Title: Senior Vice President, General Counsel & Secretary  
Company: EDF Industrial Power Services (CA), LLC  
Mailing address: 4700 W. Sam Houston Parkway N.  
Suite 250  
Houston, TX 77041  
Telephone: 281-653-5811  
Email: eric.dennison@edftrading.com

Date: June 27, 2013

## VERIFICATION

I, Gregory S. G. Klatt, counsel for EDF Industrial Power Services (CA), LLC, 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 28, 2013, at Woodland Hills, California.



---

Gregory S.G. Klatt  
DOUGLASS & LIDDELL  
21700 Oxnard Street, Suite 1030  
Woodland Hills, California 91367  
Telephone: (818) 961-3002  
Facsimile: (818) 961-3004  
Email: [Klatt@energyattorney.com](mailto:Klatt@energyattorney.com)

Attorney for  
EDF Industrial Power Services (CA), LLC

