

**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
DIRECT ENERGY SERVICES, LLC**

In accordance with the May 10, 2013² Assigned Commissioner’s Ruling (“May 10 Ruling”), Direct Energy Services, LLC (“DES”) hereby submits this 2013 Renewables Portfolio Standard Procurement Plan (“RPS Plan”).¹

I. 2013 RPS Procurement Plan

DES does not currently serve retail customers in California and has no plans to begin serving customers in the near term. Accordingly, DES has not undertaken any RPS procurement. However, DES serves customers in other states that have adopted direct access and possesses the necessary capabilities and expertise to fully comply with the California RPS program if and when it acquires customers in the state.

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

DES currently has no customers in California and thus no RPS obligations.

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

DES currently has no California RPS-eligible renewable energy resources under contract.

¹ 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. DES is registered with this Commission as an electric service provider (“ESP”), ESP #1341, registered August 6, 1998. The due date for 2013 RPS Procurement Plans was subsequently extended to June 28, 2013. DES was subsequently informed via an email from Cheryl Lee of the CPUC that it is required to submit this RPS Plan despite the fact that, as explained below, the company is not currently serving any customers in California.

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

If and when DES starts serving customers in California, 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 the same.

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

DES currently has no California RPS-eligible renewable energy resources under contract.

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

DES currently has no customers in California and thus no RPS obligations.

6.6. Portfolio Optimization Strategy

DES currently has no California RPS-eligible renewable energy resources under contract, nor does it have any immediate plans to procure such resources as it is not serving customers in California.

II. Conclusion

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

Respectfully submitted,

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July 16, 2013

VERIFICATION

I, Gregory Klatt, counsel for Direct Energy Services, 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 July 16, 2013, at Woodland Hills, California.



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