

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)

EDF Industrial Power Services (CA), LLC

2012 Preliminary Annual 33% RPS Compliance Report

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

August 1, 2013

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RPS Compliance Report: Summary

2011 Annual Summary
1-Aug-13

RPS Summary Report	2011	
	MWh	% of Total Retail Sales
Total Retail Sales	0	n/a
Annual RPS Target	0	0.0%
Total RPS Eligible RECs Procured	0	0.0%
Total RPS Eligible RECs Retired for Compliance	0	0.0%

RPS Procurement Resource Mix

RPS Procurement	2011	
	MWh	% of Total RPS Procurement
Biomass	0	0.0%
Digester Gas	0	0.0%
Biodiesel	0	0.0%
Landfill Gas	0	0.0%
Muni Solid Waste	0	0.0%
Biopower Subtotal	0	0.0%
Geothermal	0	0.0%
Small Hydro	0	0.0%
Conduit Hydro	0	0.0%
Solar PV	0	0.0%
Solar Thermal	0	0.0%
Wind	0	0.0%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	0	

Claimed Portfolio Content Category of RPS Procurement

Portfolio Content Category	2011	
	MWh	% of Total RPS Procurement
RECs Procured from PCC 0 Eligible Resources	0	0.0%
RECs Procured from PCC 1 Eligible Resources	0	0.0%
RECs Procured from PCC 2 Eligible Resources	0	0.0%
RECs Procured from PCC 3 Eligible Resources	0	0.0%
	0	

RPS Compliance Report: Summary

2012 Annual Summary
1-Aug-13

RPS Summary Report	2012	
	MWh	% of Total Retail Sales
Total Retail Sales	0	n/a
Annual RPS Target	0	0.0%
Total RPS Eligible RECs Procured	0	0.0%
Total RPS Eligible RECs Retired for Compliance	0	0.0%

RPS Procurement Resource Mix

RPS Procurement	2012	
	MWh	% of Total RPS Procurement
Biomass	0	0.0%
Digester Gas	0	0.0%
Biodiesel	0	0.0%
Landfill Gas	0	0.0%
Muni Solid Waste	0	0.0%
Biopower Subtotal	0	0.0%
Geothermal	0	0.0%
Small Hydro	0	0.0%
Conduit Hydro	0	0.0%
Solar PV	0	0.0%
Solar Thermal	0	0.0%
Wind	0	0.0%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	0	

Claimed Portfolio Content Category of RPS Procurement

Portfolio Content Category	2012	
	MWh	% of Total RPS Procurement
RECs Procured from PCC 0 Eligible Resources	0	0.0%
RECs Procured from PCC 1 Eligible Resources	0	0.0%
RECs Procured from PCC 2 Eligible Resources	0	0.0%
RECs Procured from PCC 3 Eligible Resources	0	0.0%
	0	

RPS Compliance Report: Summary

2011-13 Compliance Period
1-Aug-13

RPS Summary Report	2011	2012	2013	CP TOTAL	% of Total Retail Sales
	MWh	MWh	MWh	MWh	
Total Retail Sales	0	0			n/a
Annual RPS Targets and Compliance Period Procurement Requirement	0	0			20.0%
Total RPS Eligible RECs Procured	0	0	12,424	12,424	
Total RPS Eligible RECs Retired	0	0	0	0	0.0%

This amount represents total procurement quantity requirement

This amount represents quantity of RECs retired for this compliance period

RPS Procurement Resource Mix

RPS Procurement	2011	2012	2013	CP TOTAL	% of Total RPS Procurement
	MWh	MWh	MWh	MWh	
Biomass	0	0	0	0	0.0%
Digester Gas	0	0	0	0	0.0%
Biodiesel	0	0	0	0	0.0%
Landfill Gas	0	0	0	0	0.0%
Muni Solid Waste	0	0	0	0	0.0%
Biopower Subtotal	0	0	0	0	0.0%
Geothermal	0	0	1,320	1,320	18.0%
Small Hydro	0	0	3,000	3,000	41.0%
Conduit Hydro	0	0	0	0	0.0%
Solar PV	0	0	0	0	0.0%
Solar Thermal	0	0	0	0	0.0%
Wind	0	0	3,000	3,000	41.0%
Ocean/Tidal	0	0	0	0	0.0%
Fuel Cells	0	0	0	0	0.0%
Total RPS Eligible Procurement	0	0	7,320	7,320	

Claimed Portfolio Content Category of RPS Procurement

Portfolio Content Category	2011	2012	2013	CP TOTAL	% of Total RPS Procurement
	MWh	MWh	MWh	MWh	
RECs Procured from PCC 0 Eligible Resources	0	0	0	0	0.0%
RECs Procured from PCC 1 Eligible Resources	0	0	6,424	6,424	51.7%
RECs Procured from PCC 2 Eligible Resources	0	0	3,000	3,000	24.1%
RECs Procured from PCC 3 Eligible Resources	0	0	3,000	3,000	24.1%
Total	0	0	12,424	12,424	

Data Reported by:
 EDF Industrial Power Services (CA), LLC
 August 1, 2013

Compliance Summary and Charts

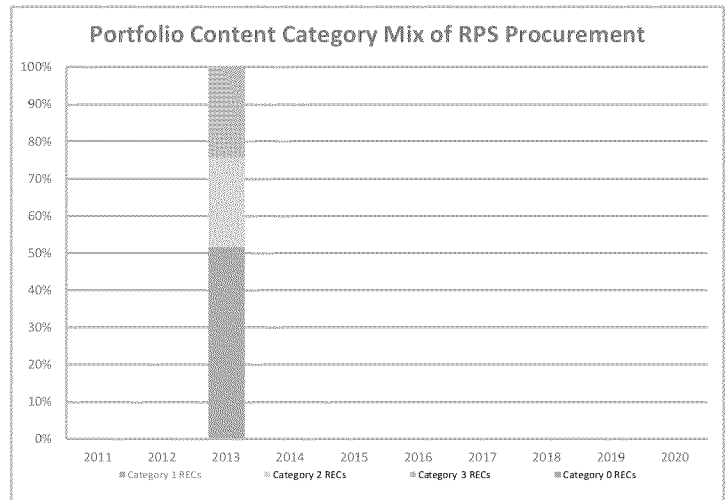
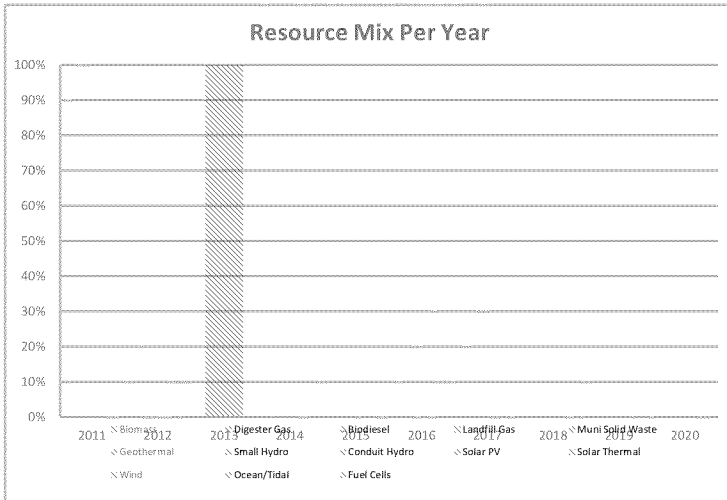
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Retail Sales (MWh)	0	0					0	0	0	0
Annual % Target	20.0%	20.0%	20.0%	21.7%	23.3%	25.0%	27.0%	29.0%	31.0%	33.0%
Annual RPS Target	0	0					0	0	0	0
Procurement Quantity Requirement									0	

Resource Mix

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Total RPS Procurement	0	0	7,320	0	0	0	0	0	0	0
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	1,320	0	0	0	0	0	0	0
Small Hydro	0	0	3,000	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	3,000	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

Portfolio Content Category Mix

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Category 0 RECs	0	0	0	0	0	0	0	0	0	0
Category 1 RECs	0	0	6,424	0	0	0	0	0	0	0
Category 2 RECs	0	0	3,000	0	0	0	0	0	0	0
Category 3 RECs	0	0	3,000	0	0	0	0	0	0	0



Annual RPS Compliance Report: Compliance Status

Data Reported by:

EDF Industrial Power Services (CA), LLC

August 1, 2013

Input Required
Actual Data
Forecasted Data
Information is Hard Coded

Information from the 20% RPS Compliance Program (MWh)	Actual
Total Retail Sales in 2010	0
Net Surplus/(Deficit) from 20% RPS Closing Report	0

Annual RPS Procurement and Percentages (MWh)	Compliance Period 1			Compliance Period 2			Compliance Period 3			
	Actual			Forecast			Forecast			
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Annual Retail Sales	0	0	12,424	0	0	0	0	0	0	0
Annual RPS Procurement	0	0	20.0%	21.7%	23.3%	25.0%	27.0%	29.0%	31.0%	33.0%
Annual Percentage Targets	20.0%	20.0%	20.0%	21.7%	23.3%	25.0%	27.0%	29.0%	31.0%	33.0%
Annual RPS Procurement Percentage	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Procurement Quantity Requirement (MWh)	Compliance Period 1			Compliance Period 2			Compliance Period 3			
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Procurement Quantity Requirement (PQR)	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
PCC 0 RECs Retired (Annual)	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
PCC 1 RECs Retired (Annual)	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
PCC 2 RECs Retired (Annual)	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
PCC 3 RECs Retired (Annual)	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Annual Percentage Targets	20.0%	20.0%	20.0%	n/a	n/a	n/a	n/a	n/a	n/a	n/a
RECs Retired as Percentage of Retail Sales	0.0%	0.0%	0.0%	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Total RECs Retired (Compliance Period)	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Portfolio Balance Requirements (MWh)	Compliance Period 1			Compliance Period 2			Compliance Period 3			
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
PCC 1 RECs Retired (Compliance Period)	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
PCC 2 RECs Retired (Compliance Period)	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
PCC 3 RECs Retired (Compliance Period)	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
PCC 1 Balance Requirement	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Excess/(Shortfall) Retirements from PCC 1	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
PCC 3 Balance Limitation	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Ineligible Category 3	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Excess Procurement Calculation (MWh)	Compliance Period 1			Compliance Period 2			Compliance Period 3			
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
PCC 0 RECs applied to PQR	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long-Term PCC 1 RECs applied to PQR	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Short-Term PCC 1 RECs applied to PQR	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long-Term PCC 2 RECs applied to PQR	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Short-Term PCC 2 RECs applied to PQR	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long-Term PCC 3 RECs applied to PQR	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Short-Term PCC 3 RECs applied to PQR	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Excess RECs Eligible for Banking	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Excess PCC 0 RECs	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Excess PCC 1 RECs	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Excess PCC 2 RECs	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Remaining Excess RECs Eligible for Banking and Requiring a Category Assignment	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Excess Procurement Bank (MWh)	Compliance Period 1			Compliance Period 2			Compliance Period 3			
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
PCC 0 Bank	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
PCC 1 Bank	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
PCC 2 Bank	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Application of PCC 0 Banked RECs	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Application of PCC 1 Banked RECs	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Application of PCC 2 Banked RECs	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Cumulative PCC 0 Bank	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Cumulative PCC 1 Bank	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Cumulative PCC 2 Bank	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a

RPS Compliance Status (MWh)	Compliance Period 1			Compliance Period 2			Compliance Period 3			
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Additional RECs Needed to meet RPS Procurement Quantity Requirement	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Provisional 20% Closing Report	2011	2012	2013
	Deficit from Provisional 20% RPS Closing Report	0	N/A
PCC 0 RECs applied to PQR	0	0	0
Long-Term PCC 1 RECs applied to PQR	0	0	0
Short-Term PCC 1 RECs applied to PQR	0	0	0
Long-Term PCC 2 RECs applied to PQR	0	0	0
Short-Term PCC 2 RECs applied to PQR	0	0	0
Long-Term PCC 3 RECs applied to PQR	0	0	0
Short-Term PCC 3 RECs applied to PQR	0	0	0
Application of PCC 0 RECs to 20% Closing Report Deficit	0	0	0
Application of Long-term PCC 1 RECs to 20% Closing Report Deficit	0	0	0
Application of Short-term PCC 1 RECs to 20% Closing Report Deficit	0	0	0
Application of Long-term PCC 2 RECs to 20% Closing Report Deficit	0	0	0
Application of Short-term PCC 2 RECs to 20% Closing Report Deficit	0	0	0
Application of Long-term PCC 3 RECs to 20% Closing Report Deficit	0	0	0
Application of Short-term PCC 3 RECs to 20% Closing Report Deficit	0	0	0
Cumulative Closing Report Deficit	0	N/A	0

Line Item	Amount	Actual	Remaining
1000	1000	1000	0
2000	2000	2000	0
3000	3000	3000	0
4000	4000	4000	0
5000	5000	5000	0
6000	6000	6000	0
7000	7000	7000	0
8000	8000	8000	0
9000	9000	9000	0
10000	10000	10000	0

Line Item	Amount	Actual	Remaining
1000	1000	1000	0
2000	2000	2000	0
3000	3000	3000	0
4000	4000	4000	0
5000	5000	5000	0
6000	6000	6000	0
7000	7000	7000	0
8000	8000	8000	0
9000	9000	9000	0
10000	10000	10000	0

Line Item	Amount	Actual	Remaining
1000	1000	1000	0
2000	2000	2000	0
3000	3000	3000	0
4000	4000	4000	0
5000	5000	5000	0
6000	6000	6000	0
7000	7000	7000	0
8000	8000	8000	0
9000	9000	9000	0
10000	10000	10000	0
11000	11000	11000	0
12000	12000	12000	0
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19000	19000	19000	0
20000	20000	20000	0
21000	21000	21000	0
22000	22000	22000	0
23000	23000	23000	0
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92000	92000	92000	0
93000	93000	93000	0
94000	94000	94000	0
95000	95000	95000	0
96000	96000	96000	0
97000	97000	97000	0
98000	98000	98000	0
99000	99000	99000	0
100000	100000	100000	0

Input Required
 Actual Data
 Projected Data

Retirement Summary (Details)	Actual MWh		Forecast MWh											
	2011	2012	1	2	3	4	5	6	7	8	9	10	11	12
Total Annual Retirement MWh	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Amount of RPS 12-month RPS Exceeded from RPS	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Amount of RPS 12-month RPS Exceeded from RPS	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Amount of RPS 12-month RPS Exceeded from RPS	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Amount of RPS 12-month RPS Exceeded from RPS	0	0	0	0	0	0	0	0	0	0	0	0	0	0

RPS Exceedance Breakdown by Category	Actual MWh		Forecast MWh											
	2011	2012	1	2	3	4	5	6	7	8	9	10	11	12
Category	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Category	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Category	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Category	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Category	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Category	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Category	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Category	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Category	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Category	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Category	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Category	0	0	0	0	0	0	0	0	0	0	0	0	0	0

ID	Contract	Contract Name	Description	Actual MWh		Forecast MWh												Contract Type	Contract Duration	Contract Status	Start Term Contract Expiry
				2011	2012	1	2	3	4	5	6	7	8	9	10	11	12				
1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
2	2	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
3	3	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
4	4	4	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
5	5	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
6	6	6	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
7	7	7	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
8	8	8	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
9	9	9	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
10	10	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
11	11	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
12	12	12	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
13	13	13	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
14	14	14	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
15	15	15	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
16	16	16	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
17	17	17	17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
18	18	18	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
19	19	19	19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
20	20	20	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
21	21	21	21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
22	22	22	22	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
23	23	23	23	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
24	24	24	24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
25	25	25	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
26	26	26	26	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
27	27	27	27	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
28	28	28	28	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
29	29	29	29	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
30	30	30	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
31	31	31	31	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
32	32	32	32	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
33	33	33	33	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
34	34	34	34	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
35	35	35	35	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
36	36	36	36	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
37	37	37	37	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
38	38	38	38	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
39	39	39	39	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
40	40	40	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
41	41	41	41	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
42	42	42	42	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
43	43	43	43	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
44	44	44	44	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
45	45	45	45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
46	46	46	46	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
47	47	47	47	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
48	48	48	48	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
49	49	49	49	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
50	50	50	50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		

EDF Industrial Power Services (CA), LLC
2012 Preliminary Annual 33% RPS Compliance Report
Narrative Reporting Requirements

1. To date, EIPS has not entered into any supply contracts for California RPS-eligible products from facilities that have not yet attained their commercial on-line dates.
2. EIPS did not procure any California RPS-eligible products in 2012, but so far in 2013 has completed the following procurement of RECs produced by RPS-eligible facilities located outside of California but within the WECC:

<u>FacilityName</u>	<u>Location</u>	<u>Amount</u>
White Creek Wind I	Roosevelt, WA	3,000
Garland Canal Hydroelectric Project	Powell, WY	3,000
	TOTAL	6,000

3. EIPS did not procure any California RPS-eligible products in 2012, but so far in 2013 has completed the following procurement of unbundled RECs:

<u>FacilityName</u>	<u>Location</u>	<u>Amount</u>
Garland Canal Hydroelectric Project	Powell, WY	3,000
	TOTAL	3,000

4. EIPS has no recommendations at this time with regard to removing impediments to making progress toward achieving California RPS procurement requirements.

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 July 30, 2013 at Houston, TX.

A handwritten signature in black ink, appearing to read "Eric Dennison", with a large, stylized flourish at the end.

Eric Dennison, Sr. Vice President