## 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)

## SAFETY SUPPLEMENT TO 2013 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN OF DIRECT ENERGY SERVICES, LLC

In accordance with the July 24, 2013 Administrative Law Judge's Ruling, Direct Energy Services, LLC ("DES") hereby submits this supplement to its 2013 Renewables Portfolio Standard Procurement Plan ("RPS Plan"). Given that DES does not own, operate or control any RPS-eligible generation facilities, its RPS Plan does not give rise to any safety considerations.

Respectfully submitted,

/s/

Jay Robertson Senior Manager, CAISO, AZ and Renewables Portfolio Management DIRECT ENERGY 12 Greenway Plaza, Suite 250 Houston, Texas 77046

Telephone: 713-877-5712

Email: Jay.Robertson@directenergy.com

August 28, 2013

## **VERIFICATION**

I, Gregory S. G. 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 Safety Supplement to 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 August 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

Attorney for

**DIRECT ENERGY SERVICES, LLC**