# 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)

# Commerce Energy, Inc.

# 2012 Preliminary Annual 33% RPS Compliance Report

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

# **PUBLIC VERSION**

August 1, 2013

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#### CALIFORNIA'S RENEWABLES PORTFOLIO STANDARD

#### 2012 Preliminary Annual 33% RPS Compliance Reporting Instructions

Annual RPS compliance reports submitted by retail sellers include qualitative and quantitative elements, as required by the Public Utilities Code 399.13 and Commission decisions, notably, Decision (D.) 11·12·020, D.11·12·052 and D.12·06·038. Specific procedural guidelines, reporting requirements and general explanations about the RPS compliance spreadsheet are detailed below. Any questions concerning RPS compliance matters should be directed to Robert Blackney robert.blackney@cpuc.ca.gov, (415) 703·3072.

#### Procedural Guidelines

- D.12-06-038 requires Investor Owned Utilities (IOU), Multi-Jurisdictional Utilities (MJU), Electric Service Providers (ESP), and Community Choice Aggregators (CCAs) to submit an annual report on its compliance with the California RPS program. Refer to D.12-06-038 for additional details related to the calculations within the RPS compliance spreadsheet.
- Any retail seller seeking confidentiality protection for information required by the Compliance Report should file a declaration. Confidentiality requests shall comply with
  the substantive and procedural rules set forth in 0.06-06-066, as modified by 0.08-04-023, the Commission's decision in its Confidentiality proceeding, Rulemaking (R.) 0506-040, and any subsequent decisions issued in the same or successor proceeding. A declaration for confidentiality should identify all redacted information by tab name
  and cell reference.
- 3. RPS Compliance reports must be submitted to the Commission as specified below:
  - a. Serve a public version on the service list in proceeding R.11-05-005. All pages must be legible: If reports need to be printed and scanned to be issued to the service list, please ensure that scanned documents are not blurry or distorted. Retail sellers are responsible for maintaining confidentiality when serving a redacted report.

    The most current version of the service list can be found on the Commission's webpage:

http://www.cpuc.ca.gov/service\_lists/R1105005\_79864.htm

- b) Submit a confidential Excel version utilizing the locked spreadsheet with the Energy Division by e-mailing an electronic version to robert.blackney@cpuc.ca.gov and rpscompliance@cpuc.ca.gov. Please only submit Excel documents in .xls format (.xlsm and .xlsx files willNOT be accepted).
- c) Send paper copies (confidential and public) to each of the assigned Administrative Law Judges (ALJs):

Regina M. DeAngelis and Anne E. Simon California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

- d) Do not send paper copies of the confidential version to anyone except the persons listed above, unless specifically requested.
- 4. Include the Title Page and fill out the following information:
  - a) Name of the retail seller serving the Compliance Report
  - b) Date the Compliance Report is being served
  - c) Contact information
- 5. Complete the Officer Verification Form in the format provided (Rule 1.11)

#### Narrative Reporting Requirements

Pursuant to Public Utilities Code Section 399.13(a)(3), each retail seller must include the following narrative information in each Annual Compliance Report and in the final report for each compliance period:

- 1. The status of any necessary siting and permitting approvals from federal, state, and local agencies for those eligible renewable energy resources procured by the retail seller that have not yet attained their commercial on-line dates.
- 2. Identification of all procurement from eligible renewable energy resources located outside California and within the WECC during the period covered by the report. Retail sellers should submit a list of facilities in a matrix format including: facility name, location (City and State), and the amount of renewable energy credits (RECs) procured during the year covered by the report (i.e. 2012 for this report). If a retail seller did not procure any RECs from out of state facilities, please include a brief summary on whether the retail seller intends to procure RECs from facilities located out of state in the future, and if so where these facilities may be located.
- 3. Identification of all procurement of unbundled RECs during the period covered by the report. Retail sellers should submit a list of facilities in a matrix format including: facility name, location (City and State), and the amount of unbundled RECs procured during the year covered by the report (i.e. 2012 for this report). If a retail seller did not procure any unbundled RECs, please include a brief summary on whether the retail seller intends to procure unbundled RECs in the near future, and if so where these RECs originate.
- 4. Recommendations to remove impediments to making progress toward achieving the renewable energy resources procurement requirements established by statute and implemented by Commission decision.

Each retail seller that is also an electrical corporation must, in addition to the four items set forth above, include the following narrative information in each annual compliance report and in the final report for each compliance period:

1. The current status and progress made during the prior year toward construction of, and upgrades to, transmission and distribution facilities and other electrical system components owned by that electrical corporation to interconnect eligible renewable energy resources and to supply the electricity generated by those resources to load. The narrative must specifically include, but is not limited to, the status of planning, siting, and permitting of transmission facilities by federal, state, and local agencies. If a retail seller does not currently own any transmission lines, describe any plans to own transmission lines in the future, if at all.

### **RPS Compliance Report Spreadsheet Instructions**

#### **General Instructions**

- 1. Orange cells throughout the spreadsheet indicate data provided by the retail seller.
- 2. All data must be entered in megawatt-hours (MWh) out to three decimal points to accurately account for reported retail sales, quantity or renewable energy credits (RECs)

and targets. The spreadsheet will display MWh throughout. Do not round any reporting data, as this may result in calculation errors.

- 3. The RPS compliance spreadsheet has locked cells to ensure accurate calculations. An unprotected version of the spreadsheet is available by request.
- 4. Protecting confidential data: Individual cells may be formatted black, which will serve to redact info when excel file is converted to pdf. Select cell click on "fill color" icon choose black. Note: Once converted to pdf, additional steps are necessary to ensure redacted data is not accessible.

#### Accounting tab instructions

The Accounting tab is where the primary RPS compliance calculations are made.

<u>Information from the 20% RPS Program</u>: 2010 retail sales figure (cells C11:D11) is needed to calculate the long-term contracting requirement for the first compliance period. Enter the "Surplus/(Deficit) Carried Forward" value from the "Provisional 20% RPS Closing Report" (cells C12:D12). Pursuant to D.12-06-038, all CA retail sellers are required to file a Closing Report to calculate their surplus/(deficit) procurement amount from the 20% RPS program.

<u>Annual RPS Procurement and Percentages</u>: This section calculates retail seller's annual percentage target and procurement made towards those targets, prior to the application of specific compliance rules.

<u>Procurement Quantity Requirement</u>: This section calculates retail seller's Procurement Quantity Requirement (PQR) for a given compliance period, and shows the total amount of RECs applied to the PQR (data sourced from the "RECs Retired to meet PQR Detail" tab).

<u>Portfolio Balance Requirements</u>: This section calculates (i) whether the retail seller met the minimum procurement requirement for Category 1 RECs, and (ii) whether the retail sellers procured Category 3 RECs within the limit for each compliance period.

<u>Excess Procurement Colculation</u>: This section calculates the quantity and classification of RECs that qualify as for excess procurement. Retail sellers will classify any RECs that qualify as excess procurement (row 57) as either a Pre-June 1, 2010 REC, a Category 1 REC or a Category 2 REC (rows 58-60).

<u>Excess Procurement Bank</u>: This section shows the amount of excess procurement available for future RPS compliance, and a retail seller's application of excess procurement RECs towards a procurement quantity requirement, as applicable.

<u>RPS Compliance Status</u>: This section shows whether or not a retail seller met its procurement quantity requirement and the deficit amount, if any. Enforcement rules for RPS compliance have yet to be determined.

Deficit from the 20% Closing Report: This section how the retail seller will satisfy its net deficit from the 20% RPS Program, as reported in the Closing Report, if any.

#### Procurement Detail tab

<u>Procurement Summary</u>: This section differentiates the reported RECs procured by classification (i.e., PCC 0, PCC 1, PCC 2 or PCC 3) and calculates whether the retail seller met the long-term contracting requirements, if any short-term (< 10 yrs) contracts were executed in a compliance period.

<u>Contract Detail</u>: For each contract, enter actual and forecasted data (MWh) for each year throughout the contract term. Do not assume that an expiring contract will be renegotiated.

- a) For ALL RPS Eligible Contracts: List contracts by CPUC ID Number, name, annual contracted deliveries (MWh), contract status, facility status, resource type, expected portfolio content category (i.e. PCC 1, PCC 2, etc.), contract length (i.e. short-term/long-term), whether contracted RECs are bundled/unbundled, the facility location (City and State), contract execution date, and the total MWh volume of the contact.
- b) "Contract Volume" (Column "AG") Input the total MWh over the term of the contract identified in the contract.
- c) Contract Execution Date: The date the original contract was signed. If the parties signed on different dates, or there are any contract amendments or modifications occurring after June 1, 2010, that increase the nameplate capacity or expected quantities of annual generation, or substitute a different renewable energy resource, use the most recent execution/signing date.
- d) Date of Most Recent Contract Extension: The date the most recent contract extension was signed. If a contract or ownership agreement originally signed by a retail seller as defined in Public Utilities Code Section 399.12(j) prior to June 1, 2010 is amended or modified after June 1, 2010, to increase the nameplate capacity or expected quantities of annual generation, the originally contracted procurement may be used for all compliance purposes, but the incremental procurement resulting from the amendment or modification will be subject to the then-applicable rules for portfolio balance, long-term contracting, and excess procurement.
- e) If any procurement data for a specific contract differs from what is reported to the CEC or included in an RPS Verification Report of the CEC for that year, the specific cell should be highlighted and the discrepancy should be explained.
- f) Procurement claims from contract/ownership agreements executed before June 1, 2010, or January 13, 2011 for ESPs, are not subject to the PCC classifications established in D.11-12-052. For the purposes of RPS compliance any eligible RPS RECs that are not subject to PCC 1, 2, or 3 will be placed in their own classification, that CPUC staff will henceforth refer to as PCC 0.

#### RECs Retired to meet PQR

The information provided in this tab is largely the same as the information within the "Procurement Detail tab"; however, rather than including all RPS eligible RECS procured, retail sellers should provide only the MWh figures of RECs retired through WREGIS and applied to their Procurement Quantity Requirement.

#### 36 Month Retirement tab instructions

This tab includes formulas to determine the retirement deadline for all RPS RECs and whether the RECs retired "Pass" or "Fail" the requirements of the 36 month retirement limit.

CPUC ID: The identification number provided to facility by the CPUC.

RPS ID: The identification number provided to facility by the CEC.

 $\underline{\textit{WREGIS ID}}$  : The identification number provided to facility by WREGIS.

<u>Facility Name</u>: For Facilities NOT interconnected to a CBA, - Retail sellers must enter the facility's source name, as registered with OATI's webRegistry. This applies mainly to facilities not directly connected to a CBA.

<u>Vintage Year/Month of RECs</u>: Enter the year and month which the RECs were generation. Please create one line per combination of REC vintage and retirement date. For example RECs that have the same vintage are retired on two separate dates, please include one line per retirement date. Likewise if RECs of different vintages (e.g. June 2013 and July 2013) are retired on the same date, please include one line per vintage.

<u>REC Retirement Date</u>: Enter the date that RECs were retired - enter one line per vintage and retirement date combination. If RECs with the same vintage month/year are retired on separate date, please enter one line for each of the distinct retirement dates.

Last Month/Year to Retire RECs: This is a calculated field that determines the last month and year that RECs of a given vintage can be retired.

<u>Do RECs "Pass" or "Fail" Requirements of 36 Month Rule</u>: This is a calculated field that determines if RECs were retired within the required 36-month timeframe.

<u>MWh REC Quantity Retired</u>: Enter the quantity of RECs, with a given vintage and retirement date combination, that were retired for compliance.

# **RPS Compliance Report: Summary**

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2011 Annual Summary
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1-Aug-13

	2011	
RPS Summary Report	MWh	% of Total Retail Sales
Total Retail Sales	490,483	n/a
Annual RPS Target	98,097	20.0%
Total RPS Eligible RECs Procured	89,000	18.1%
Total RPS Eligible RECs Retired for Compliance	89,000	18.1%

# RPS Procurement Resource Mix

	2011	
RPS Procurement	MWh	% of Total RPS Procurement
Biomass	0	0.0%
Digester Gas	0	0.0%
Biodiesel	0	0.0%
andfill Gas	23,450	26.3%
Muni Solid Waste	0	0.0%
Biopower Subtotal	23,450	26.3%
Geothermal	22,550	25.3%
Small Hydro	0	0.0%
Conduit Hydro	0	0.0%
olar PV	0	0.0%
Solar Thermal	0	0.0%
<i>N</i> ind	43,000	48.3%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	89,000	

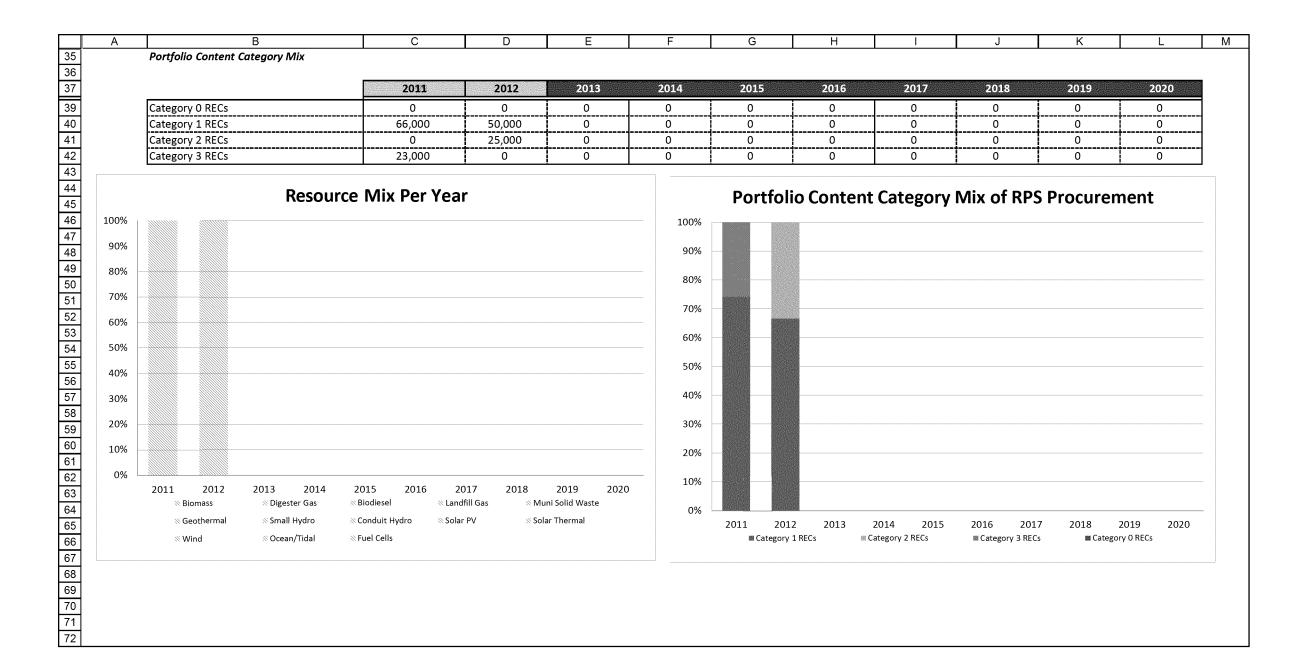
# Claimed Portfolio Content Category of RPS Procurement

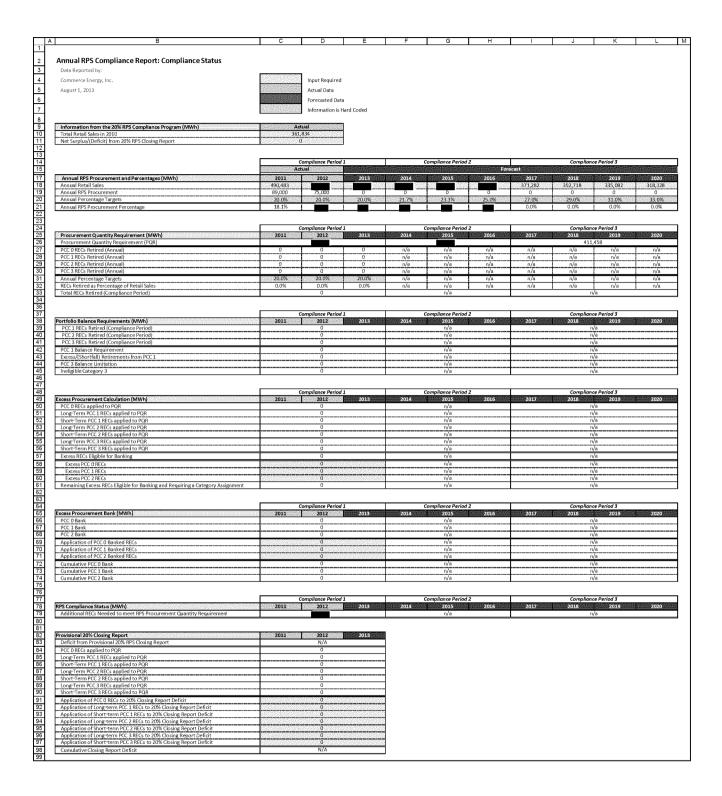
	2011	
Portfolio Content Category	MWh	% of Total RPS Procurement
RECs Procured from PCC 0 Eligible Resources	0	0.0%
RECs Procured from PCC 1 Eligible Resources	66,000	74.2%
RECs Procured from PCC 2 Eligible Resources	0	0.0%
RECs Procured from PCC 3 Eligible Resources	23,000	25.8%
	89,000	

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	RPS Compliance Report: Summary		
	2012 Annual Summary		
	1-Aug-13		
		2012	1
	RPS Summary Report	MWh	% of Total Retail Sales
	Total Retail Sales		n/a
	Annual RPS Target		20.0%
	Total RPS Eligible RECs Procured	75,000	
	Total RPS Eligible RECs Retired for Compliance	75,000	12.6%
	RPS Procurement Resource Mix		
			ma.
	,	2012	<b></b>
	RPS Procurement	MWh	% of Total RPS
	Biomass	25,000	Procurement 33.3%
	Digester Gas	23,000	0.0%
	Biodiesel		0.0%
	Landfill Gas	14,935	19.9%
	Muni Solid Waste	0	0.0%
	Biopower Subtotal	39,935	53.2%
	Geothermal	35,000	46.7%
	Small Hydro	0	0.0%
	Conduit Hydro	0	0.0%
	Solar PV	0	0.0%
	Solar Thermal	0	0.0%
	Wind	65	0.1%
	Ocean/Tidal	0	0.0%
	Fuel Cells	0	0.0%
	Total RPS Eligible Procurement	75,000	
	<u> </u>		3
	Claimed Portfolio Content Category of RPS Procurement		
	cialinea Fortjono content category of KF3 Frocurement		
		2012	B
			% of Total RPS
	Portfolio Content Category	MWh	Procurement
	RECs Procured from PCC 0 Eligible Resources	0	0.0%
	RECs Procured from PCC 1 Eligible Resources	50,000	66.7%
	RECs Procured from PCC 2 Eligible Resources	25,000	33.3%
	RECs Procured from PCC 3 Eligible Resources	0	0.0%
		75,000	

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RPS Compliance Report: Summary								
	2011-13 Complian	ce Period						
1-Aug-13								
	2611	2012	2013	CP TOTAL				
RPS Summary Report	MWh	MWh	MWh	MWh	% of Total Retail Sales	This amount		
Total Retail Sales	490,483				n/a	requirement	ement quant	ity
Annual RPS Targets and Compliance Period Procurement Requirement	98,097				20.0%		•	
Total RPS Eligible RECs Procured	89,000	75,000	0 1	164,000		¥		_
Total RPS Eligible RECs Retired	89,000	75,000	0	164,000	10.6%		t represents	,
					The state of the s	this complia	RECs retired f	or
RPS Procurement Resource Mix						triis compila	————	
	2011	2012	2013	CP TOTAL	ı			
RPS Procurement	MWh	MWh	MWh	MWh	% of Total RPS			
: 					Procurement			
Biomass	0	25,000	0	25,000	15.2%			
Digester Gas	0	0	0	0	0.0%			
Biodiesel	0	0	0	0	0.0%			
Landfill Gas	23,450	14,935	0	38,385	23.4%			
Muni Solid Waste	0	0	0	0	0.0%			
Biopower Subtotal	23,450	39,935		63,385	38.6%			
Geothermal	22,550	35,000	0	57,550 0	35.1%			
Small Hydro		n	0		0.0%			
Conduit Hydro Solar PV	0	0	U		0.0%			
SolarPV	. (	0	0		0.0%			
Wind	43,000	65	0	0 43.065	26.3%			
Ocean/Tidal	43,000	0	0	43,065	0.0%			
	Secretaria de la constante de							
Fuel Cells	0	0	0	0	0.0%			
Total RPS Eligible Procurement	89,000	75,000	0	164,000				
Claimed Portfolio Content Category of RPS Procurement								
,	2011	2012	2013	CP TOTAL	<b>I</b>			
Portfolio Content Category	MWh	MWh	MWh	MWh	% of Total RPS Procurement			
RECs Procured from PCC 0 Eligible Resources	0	0	0	0	0.0%			
RECs Procured from PCC 1 Eligible Resources	66,000	50,000	0	116,000	70.7%			
RECs Procured from PCC 2 Eligible Resources	0	25,000	0	25,000	15.2%			
	23,000	0	0	23,000	14.0%			
RECs Procured from PCC 3 Eligible Resources	23,000	0 ;	0 .					

	Α	В	С	D	E	F	G	Η	I	J	K	L	M
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2	D	Data Reported by:											
3	C	Commerce Energy, Inc.											
4	A	August 1, 2013											
5													
6	Cor	mpliance Summary and Charts											
7													
8			2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	
10	Ret	tail Sales (MWh)	490,483						371,282	352,718	335,082	318,328	1
11		inual % Target	20.0%	20.0%	20.0%	21.7%	23.3%	25.0%	27.0%	29.0%	31.0%	33.0%	7
12		nual RPS Target	98,097						100,246	102,288	103,875	105,048	7
13	Pro	ocurement Quantity Requirement								411	.,458	•	
14													
15	Res	source Mix											
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# Annual RPS Compliance Report: Retirement Detail Data Reported by: Commerce Energy, Inc. August 1, 2009.

Input Required
Actual Data
Forecasted Data

	Act	ual MWh					ŗ	Forecasted P	AWh .			
Retirement Summary (MIWh)	2011	2012	20	)13	2014	2015	2016		2017	018	2019	2020
Total Annual Retirements	89,000	75,000		) :	0	 0	0		0	 0	. 0	0
Long-Term PCC 0 RECs Retired	0	. 0	1	)	0	0	0		0	0	. 0	0
Short-Term PCC 0 RECs Retired	0	: 0		) :	0	 0	0		0	0	0	 0
Long-Term PCC1 RECs Retired	0	. 0		)	0	0	0		0	0	0	0
Short-Term PCC 1 RECs Retired	66,000	50,000		)	0	0	0		0	 0	. 0	0
Long-Term PCC2 RECs Retired	0	. 0	J 1	)	0	 0	0		0	0	. 0	 0
Short-Term PCC2 RECs Retired	0	25,000		)	0	0	0		0	0	0	0
Long-Term PCC 3 RECs Retired	0	. 0		)	0	0	0		0	0	0	0
Short-Term PCC 3 RECs Retired	23,000	. 0		0 :	0	 0	0		0	 0	0	 0
Total RECs Retired per Compliance Period		164,000				0					)	
Amount of PCC 1 Short-Term RECs Excluded from PQR	66,000	50,000		0	0	0	0		. 0	0	0	. 0
Amount of PCC 2 Short-Term RECs Excluded from PQR	0	25,000		0	0	0	0		0	0	. 0	0
Amount of PCC 3 Short-Term RECs Excluded from PQR	23,000	. 0		D :	0	0	0		0	0	0	0
Retired RECs Eligible for Compliance		0				0				{	)	

RPS Eligible Procurement By Resource Type	20	11	2012	2013	20	014	20	015	20	)16	20	117	,	2018		2019	2020
Biomass	: 0		25,000	0		0	-	0		0		0		0		0	 0
Digester Gas	. 0		0	0		0		0		D		D		0		0	0
Biodiesel	. 0		0	0		0		0		D		D		0		0	0
Landfill Gas	23,4	50	14,935	 0		0		0		D		D		0	12 - 12 - 12	0	 0
Muni Solid Waste	. 0		0	0		0		0		D		0		0		0	0
Biopower Subtotal	23,4	50 ;	39,935	0		0		0		D		D		0		0	 0
Geothermal	: 22,5	50	35,000	0		0	1 1	0		D	1 1	0		0		0	0
Small Hydro	. 0		. 0	0		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	1	0	1 1	0		0		0	0
Solar Thermal	. 0		0	0		0		0		D		0		0		0	0
Wind	43,0	00	65	 0		0	i	0		0		0		0		0	 0
Ocean/Tidal	. 0		0	0		0		0		D		0		0		0	0
Fuel Cells	. 0		0	0		0		0		0		0		0		0	 0

ALBERTAN ARTHUR AND ARTHUR ART	Retirement Detail	2011	2012	2013	2014 2015	2016	2017	2018	2019	2020	and the second second second second second	PARAMANAN NA KANDARAN NA K	KONTONIA SONIA SONIA SOSSISSI A SONIA SONIA SINS	AND CONTRACTOR OF CONTRACTOR O
Contract Year	Contract Detail	89,000	75,000	0	0 0			0 :			Resource Type	Expected Classification	Contract Length	Short Term Contract Eligibilit
2011	Calpine - Pastoria Biogas (Sep 2011)	2,000	- 6	Ð	0 0	. 0	. 0	0	0	0	Landfill Gas	PGC 1	Short-term	ineligible Short-term
2011	Nextera - White Creek 1 (Wind)	2,160	0	. 0	0 0	0	- 0	. 0	0	0	Wind	PCC3	Short-term	Ineligible Short-term
2011	Nextera - Leaning Juniper (Wind)	20,840	- 0	0	0 0	0	. 0	0	. 0	0	Wind	PEC 3	Short-term	ineligible Short-term
2011	Calpine - Pastoria Biogas (Oct Dec 2011)	21,450	0	. 0	0 0	- 0	0	0	0	0	Landfill Gas	PCC1	Shortterm	ineligible Short-term
2011	Calpine - Geysers Unit 18 (Oct-Dec 2011)	22,550	0	0	0 0	- 0	0	0	0	0	Geothermal	PCC 1	Short term	ineligible Short-term
2011	EDF * Cassia (Wind)	20,000	0	0	0 0	. 0	0	. 0	0	0	Wind	PCC1	Short term	Ineligible Short term
2012	EDF - Geysers Powerplant-Calpine Geyser	0	13,419	0	0 0	- 0	0	0	0	0	Geothermal	PCC 1	Short-term	ineligible Short-term
2012	EDF - Geysers Power Plant - Calpine Geothermal U 18	0	21,500	0	0 0	. 0	0	0	0	0	Geothermal	PCC1	Short term	Ineligible Short term
2012	EDF - Geysers Power Plant - Calpine Geothermal U 20	0	81	0	0 0	0	. 0	.0	0	0	Geothermal	PCC 1	Shart-term	Ineligible Short-term
2012	Roosevelt Biogas 1 = LFG Engines 7-9 = LFG Phase II	. 0	11,245	. 0	0 0	0	- 6	0	0 )	0	Landfill Gas	PCC1	Short-term	Ineligible Short-term
2012	Dokle Wind Energy Project	0	65	8	0 0		0	0	0	0	Wind	PCC 1	Short-term	Ineligible Short-term
2012	Roosevelt Biogas 1 = LFG Engines 7-9 = LFG Phase II	0	3,690	0	0 0		0	0	0	0	Landfill Gas	PCC 1	Short-term	Ineligible Short-term
2012	Seneca Sustainable Energy "Seneca Sustainable Energy		25,000	0 .	0 0	0	. 0	0	0	0	Biomass	PCC 2	Short term	Ineligible Short term
	Contract Name	0	0	0	0 0	0	. 0		0	0				E.
	Contract Name	0	0	0	0 0	0	0	0	0	Ø				
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	Contract Name	0	0	0	0 0	0	. 0	0	0	0				ă
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	Contract Name	0	0	0	0 0	0	O	O.	. 0	0				

# Annual RPS Compliance Report: (2011) 36 Month Retirement

Data Reported by:

Commerce Energy, Inc.

August 1, 2013

Input Required
Information is Hard Coded (No Input Required)

Note: Please create one line per combination of REC vintage and REC retirement date. For example RECs that have the same vintage are retired on two separate dates, please include one line per retirement date. Likewise if RECs of different vintages (e.g. June 2013 and July 2013) are retired on the same date, please include one line per vintage.

CPUC ID	RPS ID	WREGIS_ID	Facility Name	Vintage Month/Year	Retirement Date (DD/MM/YYYY)	Last Month to Retire REC (Month/Year)	Do RECs "Pass" or "Fail" Requirements of 36 Month Rule:	MWh REC Quantity Retired
	60008A	W125	Geysers Power Plant - Calpine Geothermal Unit 18	Nov-11	7/28/2013	Oct-2014	COMPLIANT	7306
	60008A	W125	Geysers Power Plant - Calpine Geothermal Unit 18	Oct-11	7/28/2013	Sep-2014	COMPLIANT	7.305
	60008A	W125	Geysers Power Plant - Calpine Geothermal Unit 18	Dec-11	7/28/2013	Nov-2014	COMPLIANT	7939
	60942A	W823	Cassia Gulch Wind Park - Cassia Gulch Wind Park LL	Jan 11	7/28/2013	Dec-2013	COMPLIANT	3657
	60942A	W823	Cassia Gulch Wind Park - Cassia Gulch Wind Park LL	Feb-11	7/28/2013	Jan-2014	COMPLIANT	3566
	60942A	W823	Cassia Gulch Wind Park - Cassia Gulch Wind Park LL	Mar-11	7/28/2013	Feb-2014	COMPLIANT	4575
	60942A	W823	Cassia Gulch Wind Park - Cassia Gulch Wind Park LL	Apr-11	7/28/2013	Mar-2014	COMPLIANT	1731
	60943A	W822	Cassia Wind Farm - Cassia Wind Farm LLC	Mar-11	7/28/2013	Feb-2014	COMPLIANT	2469
	60943A	W822	Cassia Wind Farm - Cassia Wind Farm LLC	Feb-11	7/28/2013	Jan-2014	COMPLIANT	2015
	60943A	W822	Cassia Wind Farm - Cassia Wind Farm LLC	Jan-11	7/28/2013	Dec-2013	COMPLIANT	1987
	61064A	W1809	Pastoria Energy Facility - LEBEC	Sep-11	7/28/2013	Aug-2014	COMPLIANT	2000
	61064A	W1809	Pastoria Energy Facility - LEBEC	Oct-11	7/28/2013	Sep-2014	COMPLIANT	5544
	61064A	W1809	Pastoria Energy Facility - LEBEC	Dec-11	7/28/2013	Nov-2014	COMPLIANT	7986
	61064A	W1809	Pastoria Energy Facility - LEBEC	Nov-11	7/28/2013		COMPLIANT	7920
	60721A	W360	Nextera - White Creek 1 (Wind)	Sep-11	12/29/2011	Aug-2014	COMPLIANT	2160
	61200A	W1689	Nextera Leaning Juniper (Wind)	Jul 11	12/29/2011	Jun-2014	COMPLIANT	20840
						33.1		
							12	
							7.5	

# Annual RPS Compliance Report: (2012) 36 Month Retirement

Data Reported by:

Commerce Energy, Inc.

August 1, 2013

Input Required
Information is Hard Coded (No Input Required)

Note: Please create one line per combination of REC vintage and REC retirement date. For example RECs that have the same vintage are retired on two separate dates, please include one line per retirement date. Likewise if RECs of different vintages (e.g. June 2013 and July 2013) are retired on the same date, please include one line per vintage.

rements of 36 MWh REC Quantity Retired	Do RECs "Pass" or "Fail" Requirements of 36 Month Rule:	Last Month to Retire REC (Month/Year)	Retirement Date (DD/MM/YYYY)	Vintage Month/Year	Facility Name	WREGIS_ID	RPS ID	CPUC ID
DMPLIANT 21500	COMPLIANT	Jan-2015	7/28/2013	Feb-12	Geysers Power Plant - Calpine Geothermal Unit 18	W125	60008A	
DMPLIANT 81	COMPLIANT	Feb-2015	7/28/2013	Mar-12	Geysers Power Plant - Calpine Geothermal Unit 20	W126	60009A	
MPLIANT 65	COMPLIANT	May-2015	7/28/2013	Jun-12	Dokie Wind - Dokie Wind	W1992	61360A	
MPLIANT 11245	COMPLIANT	Apr-2015	7/28/2013	May-12	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	W2398	60974A	
DMPLIANT 3690	COMPLIANT	May-2015	7/28/2013	Jun-12	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	W2398	60974A	
	COMPLIANT	May-2015	7/28/2013	Jun-12	Seneca Sustainable Energy - Seneca Sustainable Ene	W2045	61090A	
MPLIANT 9516	COMPLIANT	Jul-2015	7/28/2013	Aug-12	Seneca Sustainable Energy - Seneca Sustainable Ene	W2045	61090A	
DMPLIANT 1	COMPLIANT	May-2015	7/28/2013		Seneca Sustainable Energy - Seneca Sustainable Ene	W2045	61090A	
DMPLIANT 2957	COMPLIANT	Apr-2015	7/28/2013		Seneca Sustainable Energy - Seneca Sustainable Ene	W2045	61090A	
DMPLIANT 4378	COMPLIANT	Jun-2015	7/28/2013	Jul-12	Seneca Sustainable Energy - Seneca Sustainable Ene	W2045	61090A	
MPLIANT 13419	COMPLIANT	Feb-2015	7/28/2013	Mar-12	Geysers Power Plant - Sonoma/Calpine Geyser	W127	60010A	
(A) U	13							
						+		
MPLI MPLI	COMPLI COMPLI	Jun-2015	7/28/2013	Jul-12	Seneca Sustainable Energy - Seneca Sustainable Ene	W2045	61090A	

# 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 August 1, 2013 at La Palma, California.

Blake Lasuzzo, Vice President, Supply