

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)

**Pilot Power Group, 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

1. 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.
2. 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 D.06-06-066, as modified by D.08-04-023, the Commission's decision in its Confidentiality proceeding, Rulemaking (R.) 05-06-040, 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](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 (.xslm and .xlsx files will NOT 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.

**Information from the 20% RPS Program**: 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.

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

**Procurement Quantity Requirement**: 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).

**Portfolio Balance Requirements**: 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.

**Excess Procurement Calculation**: 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).

**Excess Procurement Bank**: 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.

**RPS Compliance Status**: 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**

**Procurement Summary**: 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.

**Contract Detail**: 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 contract.
- 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.

**RPS Compliance Report: Summary**

<b>2011 Annual Summary</b>
1-Aug-13

RPS Summary Report	2011	
	MWh	% of Total Retail Sales
Total Retail Sales	1,431,856	n/a
Annual RPS Target	286,371	20.0%
Total RPS Eligible RECs Procured	366,235	25.6%
Total RPS Eligible RECs Retired for Compliance	366,235	25.6%

**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	198,091	54.1%
Muni Solid Waste	0	0.0%
<i>Biopower Subtotal</i>	198,091	54.1%
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	168,144	45.9%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
<b>Total RPS Eligible Procurement</b>	<b>366,235</b>	

**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	198,091	54.1%
RECs Procured from PCC 2 Eligible Resources	125,144	34.2%
RECs Procured from PCC 3 Eligible Resources	43,000	11.7%
	366,235	

**RPS Compliance Report: Summary**

<b>2012 Annual Summary</b>
1-Aug-13

RPS Summary Report	2012 MWh	% of Total Retail Sales
Total Retail Sales		n/a
Annual RPS Target		20.0%
Total RPS Eligible RECs Procured	295,544	
Total RPS Eligible RECs Retired for Compliance	295,544	

**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	206,588	69.9%
Muni Solid Waste	0	0.0%
<i>Biopower Subtotal</i>	206,588	69.9%
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	88,956	30.1%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
<b>Total RPS Eligible Procurement</b>	<b>295,544</b>	

**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	206,588	69.9%
RECs Procured from PCC 2 Eligible Resources	63,956	21.6%
RECs Procured from PCC 3 Eligible Resources	25,000	8.5%
	295,544	

**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	1,431,856				n/a
Annual RPS Targets and Compliance Period Procurement Requirement	286,371				20.0%
Total RPS Eligible RECs Procured	366,235	295,544	260,027	921,806	
Total RPS Eligible RECs Retired	366,235	295,544	0	661,779	

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	198,091	206,588	134,707	539,386	58.5%
Municipal Solid Waste	0	0	0	0	0.0%
<i>Biopower Subtotal</i>	198,091	206,588	134,707	539,386	58.5%
Geothermal	0	0	0	0	0.0%
Small Hydro	0	0	0	0	0.0%
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	168,144	88,956	125,320	382,420	41.5%
Ocean/Tidal	0	0	0	0	0.0%
Fuel Cells	0	0	0	0	0.0%
<b>Total RPS Eligible Procurement</b>	<b>366,235</b>	<b>295,544</b>	<b>260,027</b>	<b>921,806</b>	

**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	198,091	206,588	134,707	539,386	58.5%
RECs Procured from PCC 2 Eligible Resources	125,144	63,956	0	189,100	20.5%
RECs Procured from PCC 3 Eligible Resources	43,000	25,000	125,320	193,320	21.0%
<b>Total</b>	<b>366,235</b>	<b>295,544</b>	<b>260,027</b>	<b>921,806</b>	

Data Reported by:  
Pilot Power Group, Inc.  
August 1, 2013

**Compliance Summary and Charts**

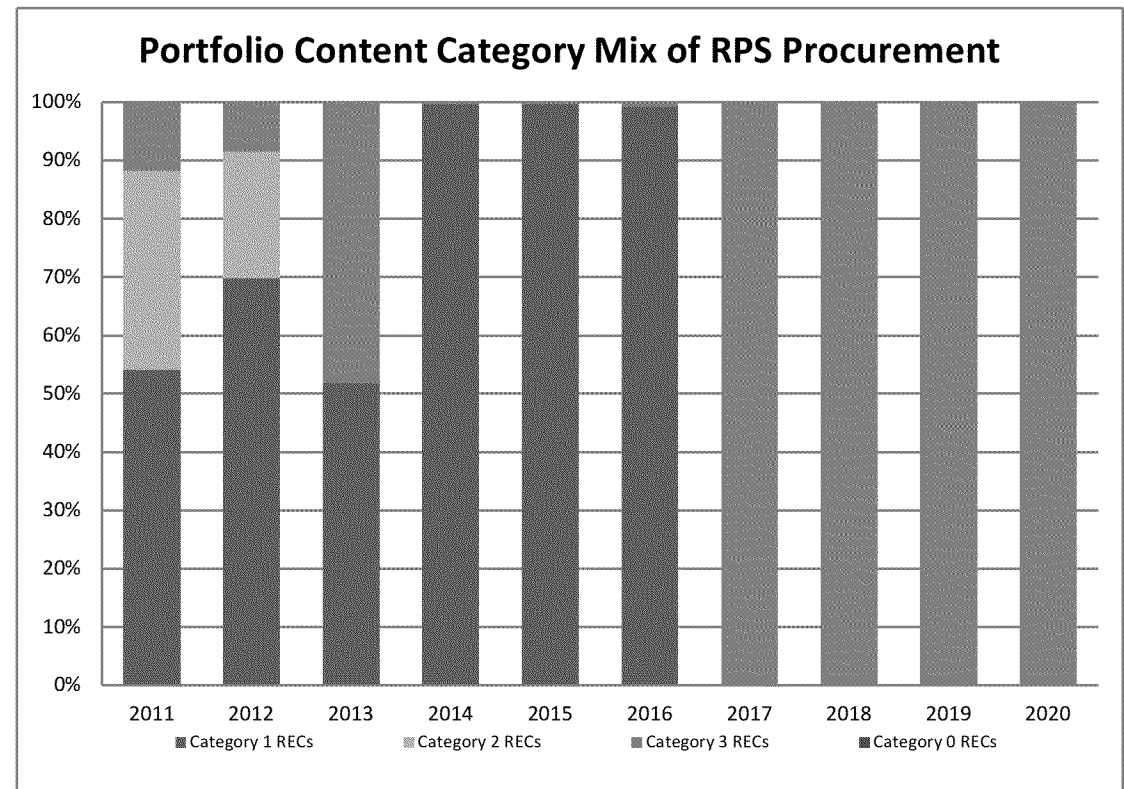
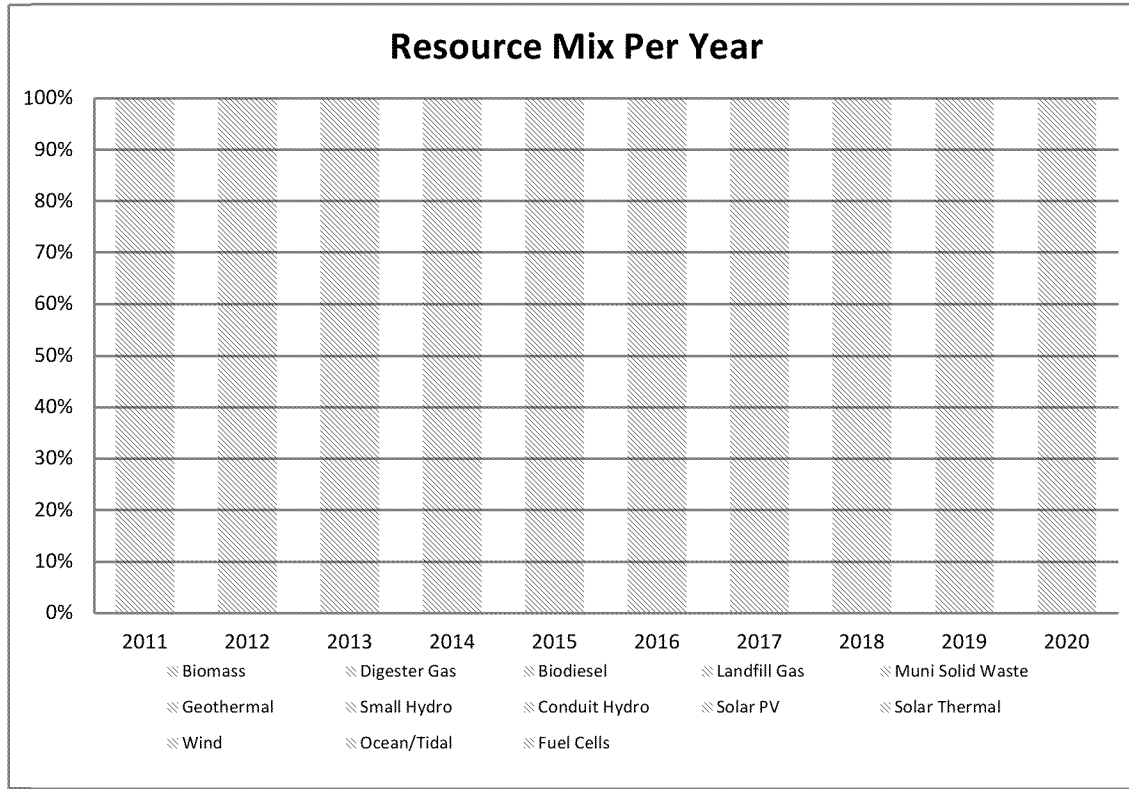
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Retail Sales (MWh)	1,431,856					1,474,639	1,474,639	1,474,639	1,474,639	1,474,639
Annual % Target	20.0%	20.0%	20.0%	21.7%	23.3%	25.0%	27.0%	29.0%	31.0%	33.0%
Annual RPS Target	286,371					368,660	398,153	427,645	457,138	486,631
Procurement Quantity Requirement							1,769,567			

**Resource Mix**

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
<b>Total RPS Procurement</b>	<b>366,235</b>	<b>295,544</b>	<b>260,027</b>	<b>89,948</b>	<b>89,948</b>	<b>46,148</b>	<b>320</b>	<b>320</b>	<b>320</b>	<b>320</b>
<i>Biomass</i>	0	0	0	0	0	0	0	0	0	0
<i>Digester Gas</i>	0	0	0	0	0	0	0	0	0	0
<i>Biodiesel</i>	0	0	0	0	0	0	0	0	0	0
<i>Landfill Gas</i>	198,091	206,588	134,707	89,628	89,628	45,828	0	0	0	0
<i>Muni Solid Waste</i>	0	0	0	0	0	0	0	0	0	0
<i>Biopower Subtotal</i>	198,091	206,588	134,707	89,628	89,628	45,828	0	0	0	0
<i>Geothermal</i>	0	0	0	0	0	0	0	0	0	0
<i>Small Hydro</i>	0	0	0	0	0	0	0	0	0	0
<i>Conduit Hydro</i>	0	0	0	0	0	0	0	0	0	0
<i>Solar PV</i>	0	0	0	0	0	0	0	0	0	0
<i>Solar Thermal</i>	0	0	0	0	0	0	0	0	0	0
<i>Wind</i>	168,144	88,956	125,320	320	320	320	320	320	320	320
<i>Ocean/Tidal</i>	0	0	0	0	0	0	0	0	0	0
<i>Fuel Cells</i>	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	198,091	206,588	134,707	89,628	89,628	45,828	0	0	0	0
Category 2 RECs	125,144	63,956	0	0	0	0	0	0	0	0
Category 3 RECs	43,000	25,000	125,320	320	320	320	320	320	320	320





	A	B	C	D	E	F	G	H	I	J	K	L	M
1													
2		<b>Annual RPS Compliance Report: Compliance Status</b>											
3		Data Reported by:											
4		Pilot Power Group, Inc.											
5		August 1, 2013											
6													
7													
8													
9		<b>Information from the 20% RPS Compliance Program (MWh)</b>											
10		Total Retail Sales in 2010											
11		Net Surplus/(Deficit) from 20% RPS Closing Report											
12													
13													
14													
15													
16													
17		<b>Annual RPS Procurement and Percentages (MWh)</b>											
18		Annual Retail Sales											
19		Annual RPS Procurement											
20		Annual Percentage Targets											
21		Annual RPS Procurement Percentage											
22													
23													
24													
25		<b>Procurement Quantity Requirement (PQR)</b>											
26		Procurement Quantity Requirement (PQR)											
27		PCC 0 RECs Retired (Annual)											
28		PCC 1 RECs Retired (Annual)											
29		PCC 2 RECs Retired (Annual)											
30		PCC 3 RECs Retired (Annual)											
31		Annual Percentage Targets											
32		RECs Retired as Percentage of Retail Sales											
33		Total RECs Retired (Compliance Period)											
34													
35													
36													
37		<b>Portfolio Balance Requirements (MWh)</b>											
38		PCC 1 RECs Retired (Compliance Period)											
39		PCC 2 RECs Retired (Compliance Period)											
40		PCC 3 RECs Retired (Compliance Period)											
41		PCC 1 Balance Requirement											
42		Excess (Shortfall) Requirements from PCC 1											
43		PCC 3 Balance Limitation											
44		Ineligible Category 3											
45													
46													
47													
48		<b>Excess Procurement Calculation (MWh)</b>											
49		PCC 0 RECs applied to PQR											
50		Long-Term PCC 1 RECs applied to PQR											
51		Short-Term PCC 1 RECs applied to PQR											
52		Long-Term PCC 2 RECs applied to PQR											
53		Short-Term PCC 2 RECs applied to PQR											
54		Long-Term PCC 3 RECs applied to PQR											
55		Short-Term PCC 3 RECs applied to PQR											
56		Excess RECs Eligible for Banking											
57		Excess PCC 0 RECs											
58		Excess PCC 1 RECs											
59		Excess PCC 2 RECs											
60		Excess PCC 3 RECs											
61		Remaining Excess RECs Eligible for Banking and Requiring a Category Assignment											
62													
63													
64													
65		<b>Excess Procurement Bank (MWh)</b>											
66		PCC 0 Bank											
67		PCC 1 Bank											
68		PCC 2 Bank											
69		Application of PCC 0 Banked RECs											
70		Application of PCC 1 Banked RECs											
71		Application of PCC 2 Banked RECs											
72		Cumulative PCC 0 Bank											
73		Cumulative PCC 1 Bank											
74		Cumulative PCC 2 Bank											
75													
76													
77		<b>RPS Compliance Status (MWh)</b>											
78		Additional RECs Needed to meet RPS Procurement Quantity Requirement											
79													
80													
81													
82		<b>Provisional 20% Closing Report</b>											
83		Deficit from Provisional 20% RPS Closing Report											
84		PCC 0 RECs applied to PQR											
85		Long-Term PCC 1 RECs applied to PQR											
86		Short-Term PCC 1 RECs applied to PQR											
87		Long-Term PCC 2 RECs applied to PQR											
88		Short-Term PCC 2 RECs applied to PQR											
89		Long-Term PCC 3 RECs applied to PQR											
90		Short-Term PCC 3 RECs applied to PQR											
91		Application of PCC 0 RECs to 20% Closing Report Deficit											
92		Application of Long-term PCC 1 RECs to 20% Closing Report Deficit											
93		Application of Short-term PCC 1 RECs to 20% Closing Report Deficit											
94		Application of Long-term PCC 2 RECs to 20% Closing Report Deficit											
95		Application of Short-term PCC 2 RECs to 20% Closing Report Deficit											
96		Application of Long-term PCC 3 RECs to 20% Closing Report Deficit											
97		Application of Short-term PCC 3 RECs to 20% Closing Report Deficit											
98		Cumulative Closing Report Deficit											
99													

Requirement	Quantity	Unit	Minimum Bid Price	Maximum Bid Price	Accepted Bid Price	Accepted Bid Date
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14

Requirement	Quantity	Unit	Minimum Bid Price	Maximum Bid Price	Accepted Bid Price	Accepted Bid Date
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14

Requirement	Quantity	Unit	Minimum Bid Price	Maximum Bid Price	Accepted Bid Price	Accepted Bid Date	Comments	Agency Name	Agency Title	Agency Email	Agency Phone	Agency Fax	Agency Website	Agency Address	Agency City	Agency State	Agency Zip	Agency Country	Agency Postal Code
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14													
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14													
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14													
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14													
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14													
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14													
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14													
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14													
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14													
CONCRETE CURBS	100	LINEAL FEET	100.00	100.00	100.00	10/15/14													



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

Data Reported by:  
Pilot Power Group, 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

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
		W703	FMG - Mid Valley - FMG - Mid Valley	01/2011	7/25/2013	Dec-2013	COMPLIANT	1022
		W703	FMG - Mid Valley - FMG - Mid Valley	02/2011	7/25/2013	Jan-2014	COMPLIANT	1035
		W703	FMG - Mid Valley - FMG - Mid Valley	03/2011	7/25/2013	Feb-2014	COMPLIANT	1165
		W703	FMG - Mid Valley - FMG - Mid Valley	04/2011	7/25/2013	Mar-2014	COMPLIANT	1127
		W703	FMG - Mid Valley - FMG - Mid Valley	05/2011	7/25/2013	Apr-2014	COMPLIANT	1274
		W703	FMG - Mid Valley - FMG - Mid Valley	06/2011	7/25/2013	May-2014	COMPLIANT	1252
		W703	FMG - Mid Valley - FMG - Mid Valley	07/2011	7/25/2013	Jun-2014	COMPLIANT	1141
		W703	FMG - Mid Valley - FMG - Mid Valley	08/2011	7/25/2013	Jul-2014	COMPLIANT	1155
		W703	FMG - Mid Valley - FMG - Mid Valley	09/2011	7/25/2013	Aug-2014	COMPLIANT	1226
		W703	FMG - Mid Valley - FMG - Mid Valley	10/2011	7/25/2013	Sep-2014	COMPLIANT	995
		W703	FMG - Mid Valley - FMG - Mid Valley	11/2011	7/25/2013	Oct-2014	COMPLIANT	998
		W703	FMG - Mid Valley - FMG - Mid Valley	12/2011	7/25/2013	Nov-2014	COMPLIANT	1194
		W702	FMG - Milliken - FMG - Milliken	01/2011	7/25/2013	Dec-2013	COMPLIANT	1104
		W702	FMG - Milliken - FMG - Milliken	02/2011	7/25/2013	Jan-2014	COMPLIANT	496
		W702	FMG - Milliken - FMG - Milliken	03/2011	7/25/2013	Feb-2014	COMPLIANT	986
		W702	FMG - Milliken - FMG - Milliken	04/2011	7/25/2013	Mar-2014	COMPLIANT	1011
		W702	FMG - Milliken - FMG - Milliken	05/2011	7/25/2013	Apr-2014	COMPLIANT	1041
		W702	FMG - Milliken - FMG - Milliken	06/2011	7/25/2013	May-2014	COMPLIANT	1088
		W702	FMG - Milliken - FMG - Milliken	07/2011	7/25/2013	Jun-2014	COMPLIANT	1107
		W702	FMG - Milliken - FMG - Milliken	08/2011	7/25/2013	Jul-2014	COMPLIANT	1047
		W702	FMG - Milliken - FMG - Milliken	09/2011	7/25/2013	Aug-2014	COMPLIANT	1028
		W702	FMG - Milliken - FMG - Milliken	10/2011	7/25/2013	Sep-2014	COMPLIANT	1107
		W702	FMG - Milliken - FMG - Milliken	11/2011	7/25/2013	Oct-2014	COMPLIANT	1039
		W702	FMG - Milliken - FMG - Milliken	12/2011	7/25/2013	Nov-2014	COMPLIANT	971
		W1306	Harvest Wind - Harvest Wind	01/2011	7/25/2013	Dec-2013	COMPLIANT	4565
		W1306	Harvest Wind - Harvest Wind	02/2011	7/25/2013	Jan-2014	COMPLIANT	4557
		W1306	Harvest Wind - Harvest Wind	03/2011	7/25/2013	Feb-2014	COMPLIANT	4639
		W1306	Harvest Wind - Harvest Wind	04/2011	7/25/2013	Mar-2014	COMPLIANT	6673
		W1306	Harvest Wind - Harvest Wind	05/2011	7/25/2013	Apr-2014	COMPLIANT	4759
		W1306	Harvest Wind - Harvest Wind	06/2011	7/25/2013	May-2014	COMPLIANT	5685
		W1306	Harvest Wind - Harvest Wind	07/2011	7/25/2013	Jun-2014	COMPLIANT	5126
		W1306	Harvest Wind - Harvest Wind	08/2011	7/25/2013	Jul-2014	COMPLIANT	5051
		W1306	Harvest Wind - Harvest Wind	09/2011	7/25/2013	Aug-2014	COMPLIANT	3271
		W1306	Harvest Wind - Harvest Wind	10/2011	7/25/2013	Sep-2014	COMPLIANT	4410
		W1306	Harvest Wind - Harvest Wind	11/2011	7/25/2013	Oct-2014	COMPLIANT	3984
		W1306	Harvest Wind - Harvest Wind	12/2011	7/25/2013	Nov-2014	COMPLIANT	2792
		W237	Klondike III - Klondike Wind Power III LLC	01/2011	7/25/2013	Dec-2013	COMPLIANT	3405
		W237	Klondike III - Klondike Wind Power III LLC	02/2011	7/25/2013	Jan-2014	COMPLIANT	4305
		W237	Klondike III - Klondike Wind Power III LLC	03/2011	7/25/2013	Feb-2014	COMPLIANT	1
		W237	Klondike III - Klondike Wind Power III LLC	03/2011	7/25/2013	Feb-2014	COMPLIANT	3799
		W237	Klondike III - Klondike Wind Power III LLC	03/2011	7/25/2013	Feb-2014	COMPLIANT	1
		W237	Klondike III - Klondike Wind Power III LLC	04/2011	7/25/2013	Mar-2014	COMPLIANT	7962
		W237	Klondike III - Klondike Wind Power III LLC	04/2011	7/25/2013	Mar-2014	COMPLIANT	1
		W237	Klondike III - Klondike Wind Power III LLC	05/2011	7/25/2013	Apr-2014	COMPLIANT	7761
		W237	Klondike III - Klondike Wind Power III LLC	06/2011	7/25/2013	May-2014	COMPLIANT	9424
		W237	Klondike III - Klondike Wind Power III LLC	07/2011	7/25/2013	Jun-2014	COMPLIANT	7907
		W237	Klondike III - Klondike Wind Power III LLC	08/2011	7/25/2013	Jul-2014	COMPLIANT	9404
		W237	Klondike III - Klondike Wind Power III LLC	09/2011	7/25/2013	Aug-2014	COMPLIANT	4218
		W237	Klondike III - Klondike Wind Power III LLC	10/2011	7/25/2013	Sep-2014	COMPLIANT	4241
		W237	Klondike III - Klondike Wind Power III LLC	11/2011	7/25/2013	Oct-2014	COMPLIANT	4589
		W237	Klondike III - Klondike Wind Power III LLC	12/2011	7/25/2013	Nov-2014	COMPLIANT	2654
		W476	MM Lopez Energy - MM Lopez Energy, LLC	01/2011	7/25/2013	Dec-2013	COMPLIANT	2056
		W476	MM Lopez Energy - MM Lopez Energy, LLC	02/2011	7/25/2013	Jan-2014	COMPLIANT	2516
		W476	MM Lopez Energy - MM Lopez Energy, LLC	03/2011	7/25/2013	Feb-2014	COMPLIANT	4312
		W476	MM Lopez Energy - MM Lopez Energy, LLC	04/2011	7/25/2013	Mar-2014	COMPLIANT	4121
		W476	MM Lopez Energy - MM Lopez Energy, LLC	05/2011	7/25/2013	Apr-2014	COMPLIANT	4215
		W476	MM Lopez Energy - MM Lopez Energy, LLC	06/2011	7/25/2013	May-2014	COMPLIANT	3996
		W476	MM Lopez Energy - MM Lopez Energy, LLC	07/2011	7/25/2013	Jun-2014	COMPLIANT	4305
		W476	MM Lopez Energy - MM Lopez Energy, LLC	08/2011	7/25/2013	Jul-2014	COMPLIANT	4056
		W476	MM Lopez Energy - MM Lopez Energy, LLC	09/2011	7/25/2013	Aug-2014	COMPLIANT	3980
		W476	MM Lopez Energy - MM Lopez Energy, LLC	10/2011	7/25/2013	Sep-2014	COMPLIANT	4240
		W476	MM Lopez Energy - MM Lopez Energy, LLC	11/2011	7/25/2013	Oct-2014	COMPLIANT	4130
		W476	MM Lopez Energy - MM Lopez Energy, LLC	12/2011	7/25/2013	Nov-2014	COMPLIANT	3901
		W1809	Pastoria Energy Facility - LEBEC	01/2011	7/25/2013	Dec-2013	COMPLIANT	9724
		W1809	Pastoria Energy Facility - LEBEC	02/2011	7/25/2013	Jan-2014	COMPLIANT	9068
		W1809	Pastoria Energy Facility - LEBEC	03/2011	7/25/2013	Feb-2014	COMPLIANT	11261
		W1809	Pastoria Energy Facility - LEBEC	04/2011	7/25/2013	Mar-2014	COMPLIANT	9548
		W1809	Pastoria Energy Facility - LEBEC	05/2011	7/25/2013	Apr-2014	COMPLIANT	10932
		W1809	Pastoria Energy Facility - LEBEC	06/2011	7/25/2013	May-2014	COMPLIANT	12960
		W1809	Pastoria Energy Facility - LEBEC	07/2011	7/25/2013	Jun-2014	COMPLIANT	9866
		W1809	Pastoria Energy Facility - LEBEC	08/2011	7/25/2013	Jul-2014	COMPLIANT	10513
		W1809	Pastoria Energy Facility - LEBEC	09/2011	7/25/2013	Aug-2014	COMPLIANT	12240
		W1809	Pastoria Energy Facility - LEBEC	10/2011	7/25/2013	Sep-2014	COMPLIANT	7763
		W1809	Pastoria Energy Facility - LEBEC	11/2011	7/25/2013	Oct-2014	COMPLIANT	11140
		W1809	Pastoria Energy Facility - LEBEC	12/2011	7/25/2013	Nov-2014	COMPLIANT	11639

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

Data Reported by:  
Pilot Power Group, 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

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
		W1890	Central Oregon Siphon Power Project - SPP	01/2012	7/25/2013	Dec-2014	COMPLIANT	3420
		W1989	Cowiche - Cowiche	05/2012	7/25/2013	Apr-2015	COMPLIANT	116
		W703	FMG - Mid Valley - FMG - Mid Valley	01/2012	7/25/2013	Dec-2014	COMPLIANT	1328
		W703	FMG - Mid Valley - FMG - Mid Valley	02/2012	7/25/2013	Jan-2015	COMPLIANT	1197
		W703	FMG - Mid Valley - FMG - Mid Valley	03/2012	7/25/2013	Feb-2015	COMPLIANT	1521
		W703	FMG - Mid Valley - FMG - Mid Valley	04/2012	7/25/2013	Mar-2015	COMPLIANT	1310
		W703	FMG - Mid Valley - FMG - Mid Valley	05/2012	7/25/2013	Apr-2015	COMPLIANT	1187
		W703	FMG - Mid Valley - FMG - Mid Valley	06/2012	7/25/2013	May-2015	COMPLIANT	1283
		W703	FMG - Mid Valley - FMG - Mid Valley	07/2012	7/25/2013	Jun-2015	COMPLIANT	968
		W703	FMG - Mid Valley - FMG - Mid Valley	08/2012	7/25/2013	Jul-2015	COMPLIANT	1246
		W703	FMG - Mid Valley - FMG - Mid Valley	09/2012	7/25/2013	Aug-2015	COMPLIANT	1186
		W703	FMG - Mid Valley - FMG - Mid Valley	10/2012	7/25/2013	Sep-2015	COMPLIANT	1177
		W703	FMG - Mid Valley - FMG - Mid Valley	11/2012	7/25/2013	Oct-2015	COMPLIANT	1050
		W703	FMG - Mid Valley - FMG - Mid Valley	12/2012	7/25/2013	Nov-2015	COMPLIANT	1101
		W702	FMG - Milliken - FMG - Milliken	01/2012	7/25/2013	Dec-2014	COMPLIANT	838
		W702	FMG - Milliken - FMG - Milliken	02/2012	7/25/2013	Jan-2015	COMPLIANT	975
		W702	FMG - Milliken - FMG - Milliken	03/2012	7/25/2013	Feb-2015	COMPLIANT	1073
		W702	FMG - Milliken - FMG - Milliken	04/2012	7/25/2013	Mar-2015	COMPLIANT	1025
		W702	FMG - Milliken - FMG - Milliken	05/2012	7/25/2013	Apr-2015	COMPLIANT	1099
		W702	FMG - Milliken - FMG - Milliken	06/2012	7/25/2013	May-2015	COMPLIANT	827
		W702	FMG - Milliken - FMG - Milliken	07/2012	7/25/2013	Jun-2015	COMPLIANT	1102
		W702	FMG - Milliken - FMG - Milliken	08/2012	7/25/2013	Jul-2015	COMPLIANT	1101
		W702	FMG - Milliken - FMG - Milliken	09/2012	7/25/2013	Aug-2015	COMPLIANT	883
		W702	FMG - Milliken - FMG - Milliken	10/2012	7/25/2013	Sep-2015	COMPLIANT	981
		W702	FMG - Milliken - FMG - Milliken	11/2012	7/25/2013	Oct-2015	COMPLIANT	1138
		W702	FMG - Milliken - FMG - Milliken	12/2012	7/25/2013	Nov-2015	COMPLIANT	1021
		W127	Geysers Power Plant - Sonoma/Calpine Geysers	11/2012	7/25/2013	Oct-2015	COMPLIANT	10161
		W127	Geysers Power Plant - Sonoma/Calpine Geysers	12/2012	7/25/2013	Nov-2015	COMPLIANT	12648
		W1862	Golden Valley Wind Park - Golden Valley Wind Park	08/2012	7/25/2013	Jul-2015	COMPLIANT	165
		W1892	Juniper Ridge Hydroelectric Facility	01/2012	7/25/2013	Dec-2014	COMPLIANT	65
		W1892	Juniper Ridge Hydroelectric Facility	02/2012	7/25/2013	Jan-2015	COMPLIANT	96
		W1892	Juniper Ridge Hydroelectric Facility	03/2012	7/25/2013	Feb-2015	COMPLIANT	66
		W1892	Juniper Ridge Hydroelectric Facility	04/2012	7/25/2013	Mar-2015	COMPLIANT	858
		W1892	Juniper Ridge Hydroelectric Facility	05/2012	7/25/2013	Apr-2015	COMPLIANT	2280
		W1892	Juniper Ridge Hydroelectric Facility	06/2012	7/25/2013	May-2015	COMPLIANT	2261
		W1892	Juniper Ridge Hydroelectric Facility	07/2012	7/25/2013	Jun-2015	COMPLIANT	2451
		W1892	Juniper Ridge Hydroelectric Facility	08/2012	7/25/2013	Jul-2015	COMPLIANT	2503
		W237	Klondike III - Klondike Wind Power III LLC	01/2012	7/25/2013	Dec-2014	COMPLIANT	4246
		W237	Klondike III - Klondike Wind Power III LLC	02/2012	7/25/2013	Jan-2015	COMPLIANT	4558
		W237	Klondike III - Klondike Wind Power III LLC	03/2012	7/25/2013	Feb-2015	COMPLIANT	5921
		W237	Klondike III - Klondike Wind Power III LLC	04/2012	7/25/2013	Mar-2015	COMPLIANT	5214
		W237	Klondike III - Klondike Wind Power III LLC	05/2012	7/25/2013	Apr-2015	COMPLIANT	7107
		W237	Klondike III - Klondike Wind Power III LLC	06/2012	7/25/2013	May-2015	COMPLIANT	7778
		W237	Klondike III - Klondike Wind Power III LLC	07/2012	7/25/2013	Jun-2015	COMPLIANT	8021
		W237	Klondike III - Klondike Wind Power III LLC	08/2012	7/25/2013	Jul-2015	COMPLIANT	7082
		W237	Klondike III - Klondike Wind Power III LLC	09/2012	7/25/2013	Aug-2015	COMPLIANT	4607
		W237	Klondike III - Klondike Wind Power III LLC	10/2012	7/25/2013	Sep-2015	COMPLIANT	3249
		W237	Klondike III - Klondike Wind Power III LLC	11/2012	7/25/2013	Oct-2015	COMPLIANT	2092
		W237	Klondike III - Klondike Wind Power III LLC	12/2012	7/25/2013	Nov-2015	COMPLIANT	4081
		W200	Leaning Juniper I - Leaning Juniper I	08/2012	7/25/2013	Jul-2015	COMPLIANT	233
		W1805	Los Medanos Energy Center - LMEC	03/2012	7/25/2013	Feb-2015	COMPLIANT	11289
		W1805	Los Medanos Energy Center - LMEC	04/2012	7/25/2013	Mar-2015	COMPLIANT	9282
		W1805	Los Medanos Energy Center - LMEC	05/2012	7/25/2013	Apr-2015	COMPLIANT	12648
		W1805	Los Medanos Energy Center - LMEC	06/2012	7/25/2013	May-2015	COMPLIANT	12240
		W1805	Los Medanos Energy Center - LMEC	07/2012	7/25/2013	Jun-2015	COMPLIANT	11013
		W1805	Los Medanos Energy Center - LMEC	08/2012	7/25/2013	Jul-2015	COMPLIANT	9804
		W1805	Los Medanos Energy Center - LMEC	09/2012	7/25/2013	Aug-2015	COMPLIANT	9256
		W1805	Los Medanos Energy Center - LMEC	10/2012	7/25/2013	Sep-2015	COMPLIANT	10271
		W1805	Los Medanos Energy Center - LMEC	11/2012	7/25/2013	Oct-2015	COMPLIANT	2079
		W476	MM Lopez Energy - MM Lopez Energy, LLC	01/2012	7/25/2013	Dec-2014	COMPLIANT	4153
		W476	MM Lopez Energy - MM Lopez Energy, LLC	02/2012	7/25/2013	Jan-2015	COMPLIANT	3000
		W476	MM Lopez Energy - MM Lopez Energy, LLC	03/2012	7/25/2013	Feb-2015	COMPLIANT	4097
		W476	MM Lopez Energy - MM Lopez Energy, LLC	04/2012	7/25/2013	Mar-2015	COMPLIANT	4224
		W476	MM Lopez Energy - MM Lopez Energy, LLC	05/2012	7/25/2013	Apr-2015	COMPLIANT	3769
		W476	MM Lopez Energy - MM Lopez Energy, LLC	06/2012	7/25/2013	May-2015	COMPLIANT	2350
		W476	MM Lopez Energy - MM Lopez Energy, LLC	07/2012	7/25/2013	Jun-2015	COMPLIANT	3124
		W476	MM Lopez Energy - MM Lopez Energy, LLC	08/2012	7/25/2013	Jul-2015	COMPLIANT	4161
		W476	MM Lopez Energy - MM Lopez Energy, LLC	09/2012	7/25/2013	Aug-2015	COMPLIANT	4047
		W476	MM Lopez Energy - MM Lopez Energy, LLC	10/2012	7/25/2013	Sep-2015	COMPLIANT	3867
		W476	MM Lopez Energy - MM Lopez Energy, LLC	10/2012	7/25/2013	Sep-2015	COMPLIANT	136
		W476	MM Lopez Energy - MM Lopez Energy, LLC	11/2012	7/25/2013	Oct-2015	COMPLIANT	3731
		W476	MM Lopez Energy - MM Lopez Energy, LLC	12/2012	7/25/2013	Nov-2015	COMPLIANT	4141
		W1882	Oregon Trail Wind Park, LLC - Oregon Trail Wind Park	01/2012	7/25/2013	Dec-2014	COMPLIANT	3423
		W1882	Oregon Trail Wind Park, LLC - Oregon Trail Wind Park	02/2012	7/25/2013	Jan-2015	COMPLIANT	3220
		W1882	Oregon Trail Wind Park, LLC - Oregon Trail Wind Park	03/2012	7/25/2013	Feb-2015	COMPLIANT	2357
		W1809	Pastoria Energy Facility - IEBEC	01/2012	7/25/2013	Dec-2014	COMPLIANT	12648
		W1809	Pastoria Energy Facility - IEBEC	02/2012	7/25/2013	Jan-2015	COMPLIANT	11832
		W1844	PaTu Wind Farm - PaTu Wind	06/2012	7/25/2013	May-2015	COMPLIANT	1486

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue Implementation		Rulemaking 11-05-005
And Administration of California Renewables Portfolio		(Filed May 5, 2011)
Standard Program.		
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**Pilot Power Group, Inc.**

**2012 Preliminary Annual 33% RPS Compliance Report**

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

Pursuant to Public Utilities Code Section 399.13(a)(3), Pilot Power Group, Inc. ("Pilot Power") provides the following narrative information with its 2012 Preliminary Annual 33% Compliance Report:

- 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.**

Pilot Power believes that all necessary siting and permitting approvals from federal, state, and local agencies have been procured by the suppliers for those eligible renewable energy resources procured by Pilot Power.

- 2. Identification of all procurement from eligible renewable energy resources located outside California and within the WECC during the period covered by the report.**

Pilot Power has procured from the following sources located outside California and within the WECC during the period covered by this report:

<b>Contract</b>	<b>Facility</b>	<b>Quantity</b>
2011 - EWEB #2	Harvest Wind and Klondike III	125,144
2012 - EWEB #3	Klondike III	63,956



**3. Identification of all procurement of unbundled renewable energy credits (RECs) during the period covered by the report.**

<b>Contract</b>	<b>Facility</b>	<b>Quantity</b>
2011 - Powerex	Harvest Wind	43,000
2012-2023 - EnergyOne	Any CEC Certified eligible under RPS	153,200

**4. Recommendations to remove impediments to making progress toward achieving the renewable energy resources procurement requirements established by statute and implemented by Commission decision.**

Making continuous changes to the RPS rules and regulations causes Electric Service Providers to purchase minimal, and shorter term renewable energy resources, in order to prevent becoming out of compliance, or over-purchasing, due to rule/regulation changes. If it is a goal of RPS to encourage significant, longer-term RPS purchases, it is recommended that all involved work to minimize rule/regulatory changes, and the effects of any that are made on existing and future ESP RPS purchases.

**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 San Diego, California.

A handwritten signature in black ink, appearing to read "Thomas R. Darton", written over a horizontal line.

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Thomas R. Darton, Vice President