

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)

Marin Energy Authority

2012 Preliminary Annual 33% RPS Compliance Report

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

July 31, 2013

Name: Dawn Weisz
Title: Executive Officer
Email: dweisz@marinenergy.com
Phone: (415) 464-6010
Fax: (415) 459-8095
Address: 781 Lincoln Avenue, Suite 320
San Rafael, CA 94901

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
 - 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 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

2011 Annual Summary	
31-Jul-13	

RPS Summary Report	2011	
	MWh	% of Total Retail Sales
Total Retail Sales	185,493	n/a
Annual RPS Target	37,099	20.0%
Total RPS Eligible RECs Procured	51,525	27.8%
Total RPS Eligible RECs Retired for Compliance	51,525	27.8%

RPS Procurement Resource Mix

RPS Procurement	2011	
	MWh	% of Total RPS Procurement
Biomass	17,319	33.6%
Digester Gas	6,203	12.0%
Biodiesel	0	0.0%
Landfill Gas	19,801	38.4%
Muni Solid Waste	0	0.0%
<i>Biopower Subtotal</i>	43,323	84.1%
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	8,202	15.9%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	51,525	

Claimed Portfolio Content Category of RPS Procurement

Portfolio Content Category	2011	
	MWh	% of Total RPS Procurement
RECs Procured from PCC 0 Eligible Resources	39,119	75.9%
RECs Procured from PCC 1 Eligible Resources	6,203	12.0%
RECs Procured from PCC 2 Eligible Resources	6,203	12.0%
RECs Procured from PCC 3 Eligible Resources	0	0.0%
	51,525	

RPS Compliance Report: Summary

2012 Annual Summary	
31-Jul-13	

RPS Summary Report	2012	
	MWh	% of Total Retail Sales
Total Retail Sales	570,144	n/a
Annual RPS Target	114,029	20.0%
Total RPS Eligible RECs Procured	166,522	29.2%
Total RPS Eligible RECs Retired for Compliance	166,522	29.2%

RPS Procurement Resource Mix

RPS Procurement	2012	
	MWh	% of Total RPS Procurement
Biomass	22,890	13.7%
Digester Gas	12,000	7.2%
Biodiesel	0	0.0%
Landfill Gas	31,015	18.6%
Muni Solid Waste	0	0.0%
<i>Biopower Subtotal</i>	65,905	39.6%
Geothermal	0	0.0%
Small Hydro	10,000	6.0%
Conduit Hydro	0	0.0%
Solar PV	165	0.1%
Solar Thermal	0	0.0%
Wind	90,452	54.3%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	166,522	

Claimed Portfolio Content Category of RPS Procurement

Portfolio Content Category	2012	
	MWh	% of Total RPS Procurement
RECs Procured from PCC 0 Eligible Resources	39,238	23.6%
RECs Procured from PCC 1 Eligible Resources	69,553	41.8%
RECs Procured from PCC 2 Eligible Resources	32,731	19.7%
RECs Procured from PCC 3 Eligible Resources	25,000	15.0%
	166,522	

RPS Compliance Report: Summary

31-Jul-13 2011-13 Compliance Period

RPS Summary Report	2011	2012	2013	CP TOTAL	% of Total Retail Sales
	MWh	MWh	MWh	MWh	
Total Retail Sales	185,493	570,144	1,050,403	1,806,039	n/a
Annual RPS Targets and Compliance Period Procurement Requirement	37,099	114,029	210,081	361,208	20.0%
Total RPS Eligible RECs Procured	51,525	166,522	281,613	499,660	27.7%
Total RPS Eligible RECs Retired	51,525	166,522	623	218,670	22.0%

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	17,319	22,890	11,091	51,300	10.3%
Digester Gas	6,203	12,000	38,000	56,203	11.2%
Biodiesel	0	0	0	0	0.0%
Landfill Gas	19,801	31,015	119,483	170,299	34.1%
Muni Solid Waste	0	0	0	0	0.0%
Blower Subtotal	43,323	65,905	168,574	277,802	55.6%
Geothermal	0	0	0	0	0.0%
Small Hydro	0	10,000	49,295	59,295	11.9%
Conduit Hydro	0	0	0	0	0.0%
Solar PV	0	165	1,650	1,815	0.4%
Solar Thermal	0	0	0	0	0.0%
Wind	8,202	90,452	62,094	160,748	32.2%
Ocean/Tidal	0	0	0	0	0.0%
Fuel Cells	0	0	0	0	0.0%
Total RPS Eligible Procurement	51,525	166,522	281,613	499,660	

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	39,119	39,238	39,119	117,476	23.5%
RECs Procured from PCC 1 Eligible Resources	6,203	69,553	121,400	197,156	39.5%
RECs Procured from PCC 2 Eligible Resources	6,203	32,731	62,094	101,028	20.2%
RECs Procured from PCC 3 Eligible Resources	0	25,000	59,000	84,000	16.8%
Total	51,525	166,522	281,613	499,660	

Data Reported by:
 Marin Energy Authority
 July 31, 2013

Compliance Summary and Charts

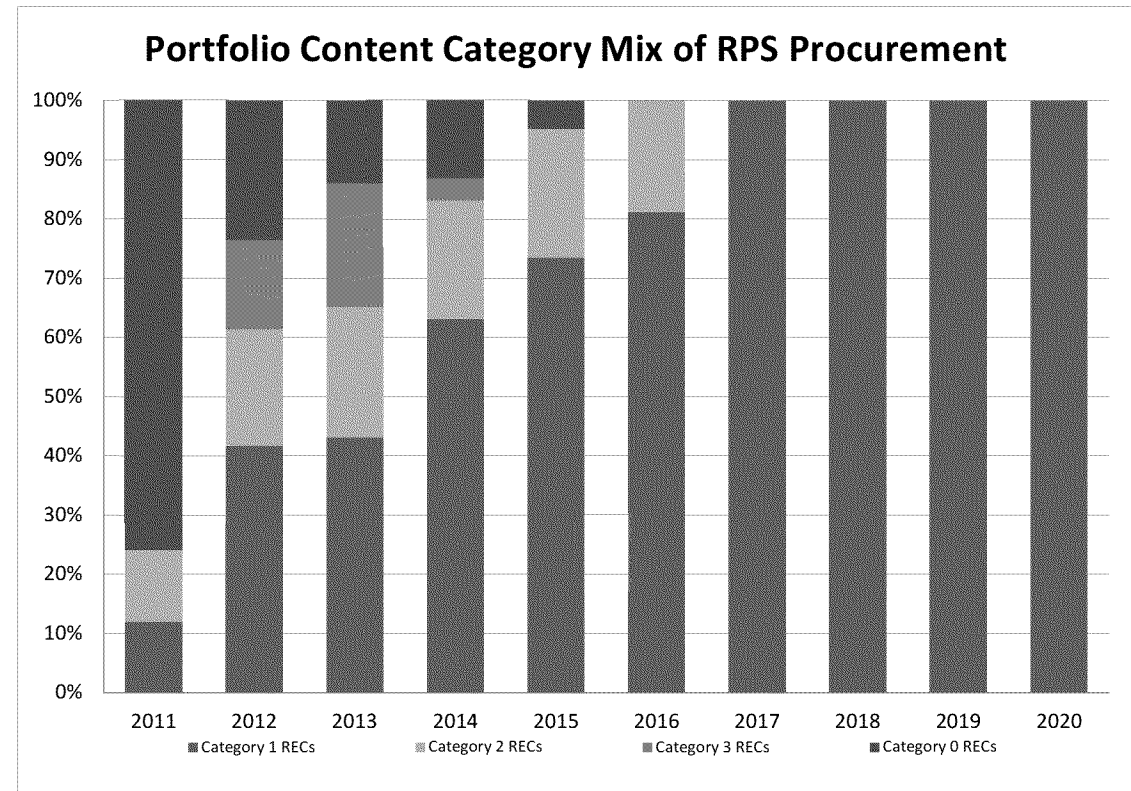
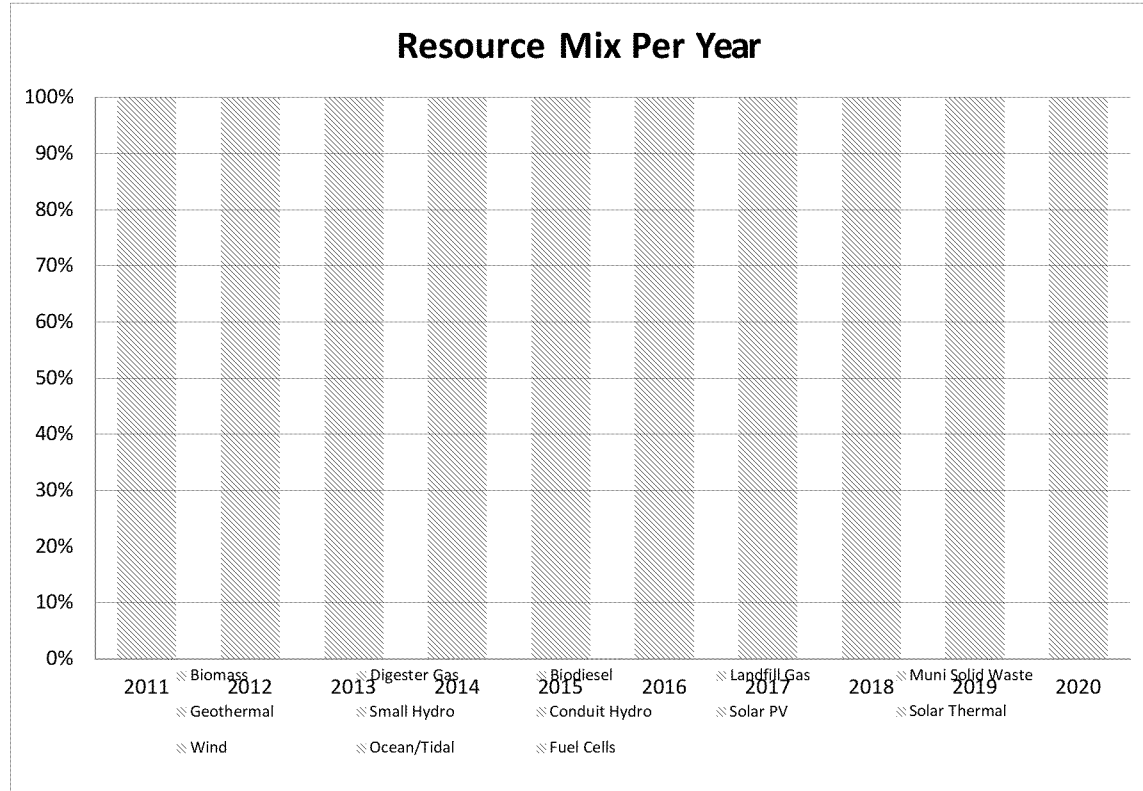
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Retail Sales (MWh)	185,493	570,144	1,050,403	1,228,604	1,224,192	1,221,231	1,220,808	1,218,100	1,218,100	1,218,100
Annual % Target	20.0%	20.0%	20.0%	21.7%	23.3%	25.0%	27.0%	29.0%	31.0%	33.0%
Annual RPS Target	37,099	114,029	210,081	266,607	285,237	305,308	329,618	353,249	377,611	401,973
Procurement Quantity Requirement	361,208		857,151			1,462,451				

Resource Mix

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Total RPS Procurement	51,525	166,522	281,613	299,403	297,591	271,650	251,250	202,250	202,250	202,250
<i>Biomass</i>	17,319	22,890	11,091	0	0	0	0	0	0	0
<i>Digester Gas</i>	6,203	12,000	38,000	0	0	0	0	0	0	0
<i>Biodiesel</i>	0	0	0	0	0	0	0	0	0	0
<i>Landfill Gas</i>	19,801	31,015	119,483	159,271	137,140	119,000	59,000	59,000	59,000	59,000
<i>Muni Solid Waste</i>	0	0	0	0	0	0	0	0	0	0
<i>Biopower Subtotal</i>	43,323	65,905	168,574	159,271	137,140	119,000	59,000	59,000	59,000	59,000
<i>Geothermal</i>	0	0	0	26,200	0	0	87,600	87,600	87,600	87,600
<i>Small Hydro</i>	0	10,000	49,295	11,000	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	165	1,650	42,650	95,650	101,650	104,650	55,650	55,650	55,650
<i>Solar Thermal</i>	0	0	0	0	0	0	0	0	0	0
<i>Wind</i>	8,202	90,452	62,094	60,282	64,801	51,000	0	0	0	0
<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	39,119	39,238	39,119	39,119	13,977	0	0	0	0	0
Category 1 RECs	6,203	69,553	121,400	189,002	218,813	220,650	251,250	202,250	202,250	202,250
Category 2 RECs	6,203	32,731	62,094	60,282	64,801	51,000	0	0	0	0
Category 3 RECs	0	25,000	59,000	11,000	0	0	0	0	0	0



	A	B	C	D	E	F	G	H	I	J	K	L	M	
1														
2		Annual RPS Compliance Report: Compliance Status												
3		Data Reported by:												
4		Marin Energy Authority												
5		July 31, 2013												
6														
7														
8														
9		Information from the 20% RPS Compliance Program (MWh)												
10			Actual											
11		Total Retail Sales in 2010	91,219											
12		Net Surplus/(Deficit) from 20% RPS Closing Report	24,543											
13														
14			Compliance Period 1			Compliance Period 2			Compliance Period 3					
15			Actual			Forecast			Forecast					
16			2011	2012	2013	2014	2015	2016	2017	2018	2019	2020		
17		Annual RPS Procurement and Percentages (MWh)												
18		Annual Retail Sales	185,493	570,144	1,050,403	1,228,604	1,224,192	1,221,231	1,220,808	1,218,100	1,218,100	1,218,100		
19		Annual RPS Procurement	51,525	166,522	281,613	299,403	297,591	271,650	251,250	202,250	202,250	202,250		
20		Annual Percentage Targets	20.0%	20.0%	20.0%	21.7%	23.3%	25.0%	27.0%	29.0%	31.0%	33.0%		
21		Annual RPS Procurement Percentage	27.8%	29.2%	26.8%	24.4%	24.3%	22.2%	20.6%	16.6%	16.6%	16.6%		
22														
23														
24			Compliance Period 1			Compliance Period 2			Compliance Period 3					
25		Procurement Quantity Requirement (MWh)	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020		
26		Procurement Quantity Requirement (PQR)		361,208			857,151							
27		PCC 0 RECs Retired (Annual)	39,119	39,238	623	n/a	n/a	n/a	n/a	n/a	n/a	n/a		
28		PCC 1 RECs Retired (Annual)	6,203	69,553	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a		
29		PCC 2 RECs Retired (Annual)	6,203	32,731	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a		
30		PCC 3 RECs Retired (Annual)	0	25,000	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a		
31		Annual Percentage Targets	20.0%	20.0%	20.0%	n/a	n/a	n/a	n/a	n/a	n/a	n/a		
32		RECs Retired as Percentage of Retail Sales	27.8%	29.2%	0.1%	n/a	n/a	n/a	n/a	n/a	n/a	n/a		
33		Total RECs Retired (Compliance Period)		218,670			n/a							
34														
35														
36														
37			Compliance Period 1			Compliance Period 2			Compliance Period 3					
38		Portfolio Balance Requirements (MWh)	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020		
39		PCC 1 RECs Retired (Compliance Period)		75,756			n/a							
40		PCC 2 RECs Retired (Compliance Period)		38,934			n/a							
41		PCC 3 RECs Retired (Compliance Period)		25,000			n/a							
42		PCC 1 Balance Requirement		69,845			n/a							
43		Excess/(Shortfall) Retirements from PCC 1		5,911			n/a							
44		PCC 3 Balance Limitation		34,923			n/a							
45		Ineligible Category 3		0			n/a							
46														
47														
48			Compliance Period 1			Compliance Period 2			Compliance Period 3					
49		Excess Procurement Calculation (MWh)	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020		
50		PCC 0 RECs applied to PQR		78,980			n/a							
51		Long-Term PCC 1 RECs applied to PQR		4,553			n/a							
52		Short-Term PCC 1 RECs applied to PQR		71,203			n/a							
53		Long-Term PCC 2 RECs applied to PQR		0			n/a							
54		Short-Term PCC 2 RECs applied to PQR		38,934			n/a							
55		Long-Term PCC 3 RECs applied to PQR		0			n/a							
56		Short-Term PCC 3 RECs applied to PQR		25,000			n/a							
57		Excess RECs Eligible for Banking		0			n/a							
58		Excess PCC 0 RECs		0			n/a							
59		Excess PCC 1 RECs		0			n/a							
60		Excess PCC 2 RECs		0			n/a							
61		Remaining Excess RECs Eligible for Banking and Requiring a Category Assignment		0			n/a							
62														
63														
64			Compliance Period 1			Compliance Period 2			Compliance Period 3					
65		Excess Procurement Bank (MWh)	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020		
66		PCC 0 Bank		24,543			n/a							
67		PCC 1 Bank		0			n/a							
68		PCC 2 Bank		0			n/a							
69		Application of PCC 0 Banked RECs		0			n/a							
70		Application of PCC 1 Banked RECs		0			n/a							
71		Application of PCC 2 Banked RECs		0			n/a							
72		Cumulative PCC 0 Bank		24,543			n/a							
73		Cumulative PCC 1 Bank		0			n/a							
74		Cumulative PCC 2 Bank		0			n/a							
75														
76														
77			Compliance Period 1			Compliance Period 2			Compliance Period 3					
78		RPS Compliance Status (MWh)	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020		
79		Additional RECs Needed to meet RPS Procurement Quantity Requirement		142,538			n/a							
80														
81														
82		Provisional 20% Closing Report	2011	2012	2013									
83		Deficit from Provisional 20% RPS Closing Report		N/A										
84		PCC 0 RECs applied to PQR		78,980										
85		Long-Term PCC 1 RECs applied to PQR		4,553										
86		Short-Term PCC 1 RECs applied to PQR		71,203										
87		Long-Term PCC 2 RECs applied to PQR		0										
88		Short-Term PCC 2 RECs applied to PQR		38,934										
89		Long-Term PCC 3 RECs applied to PQR		0										
90		Short-Term PCC 3 RECs applied to PQR		25,000										
91		Application of PCC 0 RECs to 20% Closing Report Deficit		0										
92		Application of Long-Term PCC 1 RECs to 20% Closing Report Deficit		0										
93		Application of Short-Term PCC 1 RECs to 20% Closing Report Deficit		0										
94		Application of Long-Term PCC 2 RECs to 20% Closing Report Deficit		0										
95		Application of Short-Term PCC 2 RECs to 20% Closing Report Deficit		0										
96		Application of Long-Term PCC 3 RECs to 20% Closing Report Deficit		0										
97		Application of Short-Term PCC 3 RECs to 20% Closing Report Deficit		0										
98		Cumulative Closing Report Deficit		N/A										
99														

Item	2008	2007	2006	2005	2004	2003	2002	2001	2000	1999	1998	1997	1996	1995	1994	1993	1992	1991	1990	1989	1988	1987	1986	1985	1984	1983	1982	1981	1980	1979	1978	1977	1976	1975	1974	1973	1972	1971	1970	1969	1968	1967	1966	1965	1964	1963	1962	1961	1960	1959	1958	1957	1956	1955	1954	1953	1952	1951	1950	1949	1948	1947	1946	1945	1944	1943	1942	1941	1940	1939	1938	1937	1936	1935	1934	1933	1932	1931	1930	1929	1928	1927	1926	1925	1924	1923	1922	1921	1920	1919	1918	1917	1916	1915	1914	1913	1912	1911	1910	1909	1908	1907	1906	1905	1904	1903	1902	1901	1900	1899	1898	1897	1896	1895	1894	1893	1892	1891	1890	1889	1888	1887	1886	1885	1884	1883	1882	1881	1880	1879	1878	1877	1876	1875	1874	1873	1872	1871	1870	1869	1868	1867	1866	1865	1864	1863	1862	1861	1860	1859	1858	1857	1856	1855	1854	1853	1852	1851	1850	1849	1848	1847	1846	1845	1844	1843	1842	1841	1840	1839	1838	1837	1836	1835	1834	1833	1832	1831	1830	1829	1828	1827	1826	1825	1824	1823	1822	1821	1820	1819	1818	1817	1816	1815	1814	1813	1812	1811	1810	1809	1808	1807	1806	1805	1804	1803	1802	1801	1800	1799	1798	1797	1796	1795	1794	1793	1792	1791	1790	1789	1788	1787	1786	1785	1784	1783	1782	1781	1780	1779	1778	1777	1776	1775	1774	1773	1772	1771	1770	1769	1768	1767	1766	1765	1764	1763	1762	1761	1760	1759	1758	1757	1756	1755	1754	1753	1752	1751	1750	1749	1748	1747	1746	1745	1744	1743	1742	1741	1740	1739	1738	1737	1736	1735	1734	1733	1732	1731	1730	1729	1728	1727	1726	1725	1724	1723	1722	1721	1720	1719	1718	1717	1716	1715	1714	1713	1712	1711	1710	1709	1708	1707	1706	1705	1704	1703	1702	1701	1700	1699	1698	1697	1696	1695	1694	1693	1692	1691	1690	1689	1688	1687	1686	1685	1684	1683	1682	1681	1680	1679	1678	1677	1676	1675	1674	1673	1672	1671	1670	1669	1668	1667	1666	1665	1664	1663	1662	1661	1660	1659	1658	1657	1656	1655	1654	1653	1652	1651	1650	1649	1648	1647	1646	1645	1644	1643	1642	1641	1640	1639	1638	1637	1636	1635	1634	1633	1632	1631	1630	1629	1628	1627	1626	1625	1624	1623	1622	1621	1620	1619	1618	1617	1616	1615	1614	1613	1612	1611	1610	1609	1608	1607	1606	1605	1604	1603	1602	1601	1600	1599	1598	1597	1596	1595	1594	1593	1592	1591	1590	1589	1588	1587	1586	1585	1584	1583	1582	1581	1580	1579	1578	1577	1576	1575	1574	1573	1572	1571	1570	1569	1568	1567	1566	1565	1564	1563	1562	1561	1560	1559	1558	1557	1556	1555	1554	1553	1552	1551	1550	1549	1548	1547	1546	1545	1544	1543	1542	1541	1540	1539	1538	1537	1536	1535	1534	1533	1532	1531	1530	1529	1528	1527	1526	1525	1524	1523	1522	1521	1520	1519	1518	1517	1516	1515	1514	1513	1512	1511	1510	1509	1508	1507	1506	1505	1504	1503	1502	1501	1500	1499	1498	1497	1496	1495	1494	1493	1492	1491	1490	1489	1488	1487	1486	1485	1484	1483	1482	1481	1480	1479	1478	1477	1476	1475	1474	1473	1472	1471	1470	1469	1468	1467	1466	1465	1464	1463	1462	1461	1460	1459	1458	1457	1456	1455	1454	1453	1452	1451	1450	1449	1448	1447	1446	1445	1444	1443	1442	1441	1440	1439	1438	1437	1436	1435	1434	1433	1432	1431	1430	1429	1428	1427	1426	1425	1424	1423	1422	1421	1420	1419	1418	1417	1416	1415	1414	1413	1412	1411	1410	1409	1408	1407	1406	1405	1404	1403	1402	1401	1400	1399	1398	1397	1396	1395	1394	1393	1392	1391	1390	1389	1388	1387	1386	1385	1384	1383	1382	1381	1380	1379	1378	1377	1376	1375	1374	1373	1372	1371	1370	1369	1368	1367	1366	1365	1364	1363	1362	1361	1360	1359	1358	1357	1356	1355	1354	1353	1352	1351	1350	1349	1348	1347	1346	1345	1344	1343	1342	1341	1340	1339	1338	1337	1336	1335	1334	1333	1332	1331	1330	1329	1328	1327	1326	1325	1324	1323	1322	1321	1320	1319	1318	1317	1316	1315	1314	1313	1312	1311	1310	1309	1308	1307	1306	1305	1304	1303	1302	1301	1300	1299	1298	1297	1296	1295	1294	1293	1292	1291	1290	1289	1288	1287	1286	1285	1284	1283	1282	1281	1280	1279	1278	1277	1276	1275	1274	1273	1272	1271	1270	1269	1268	1267	1266	1265	1264	1263	1262	1261	1260	1259	1258	1257	1256	1255	1254	1253	1252	1251	1250	1249	1248	1247	1246	1245	1244	1243	1242	1241	1240	1239	1238	1237	1236	1235	1234	1233	1232	1231	1230	1229	1228	1227	1226	1225	1224	1223	1222	1221	1220	1219	1218	1217	1216	1215	1214	1213	1212	1211	1210	1209	1208	1207	1206	1205	1204	1203	1202	1201	1200	1199	1198	1197	1196	1195	1194	1193	1192	1191	1190	1189	1188	1187	1186	1185	1184	1183	1182	1181	1180	1179	1178	1177	1176	1175	1174	1173	1172	1171	1170	1169	1168	1167	1166	1165	1164	1163	1162	1161	1160	1159	1158	1157	1156	1155	1154	1153	1152	1151	1150	1149	1148	1147	1146	1145	1144	1143	1142	1141	1140	1139	1138	1137	1136	1135	1134	1133	1132	1131	1130	1129	1128	1127	1126	1125	1124	1123	1122	1121	1120	1119	1118	1117	1116	1115	1114	1113	1112	1111	1110	1109	1108	1107	1106	1105	1104	1103	1102	1101	1100	1099	1098	1097	1096	1095	1094	1093	1092	1091	1090	1089	1088	1087	1086	1085	1084	1083	1082	1081	1080	1079	1078	1077	1076	1075	1074	1073	1072	1071	1070	1069	1068	1067	1066	1065	1064	1063	1062	1061	1060	1059	1058	1057	1056	1055	1054	1053	1052	1051	1050	1049	1048	1047	1046	1045	1044	1043	1042	1041	1040	1039	1038	1037	1036	1035	1034	1033	1032	1031	1030	1029	1028	1027	1026	1025	1024	1023	1022	1021	1020	1019	1018	1017	1016	1015	1014	1013	1012	1011	1010	1009	1008	1007	1006	1005	1004	1003	1002	1001	1000	999	998	997	996	995	994	993	992	991	990	989	988	987	986	985	984	983	982	981	980	979	978	977	976	975	974	973	972	971	970	969	968	967	966	965	964	963	962	961	960	959	958	957	956	955	954	953	952	951	950	949	948	947	946	945	944	943	942	941	940	939	938	937	936	935	934	933	932	931	930	929	928	927	926	925	924	923	922	921	920	919	918	917	916	915	914	913	912	911	910	909	908	907	906	905	904	903	902	901	900	899	898	897	896	895	894	893	892	891	890	889	888	887	886	885	884	883	882	881	880	879	878	877	876	875	874	873	872	871	870	869	868	867	866	865	864	863	862	861	860	859	858	857	856	855	854	853	852	851	850	849	848	847	846	845	844	843	842	841	840	839	838	837	836	835	834	833	832	831	830	829	828	827	826	825	824	823	822	821	820	819	818	817	816	815	814	813	812	811	810	809	808	807	806	805	804	803	802	801	800	799	798	797	796	795	794	793	792	791	790	789	788	787	786	785	784	783	782	781	780	779	778	777	776	775	774	773	772	771	770	769	768	767	766	765	764	763	762	761	760	759	758	757	756	755	754	753	752	751	750	749	748	747	746	745	744	743	742	741	740	739	738	737	736	735	734	733	732	731	730	729	728	727	726	725	724	723	722	721	720	719	718	717	716	715	714	713	712	711	710	709	708	707	706	705	704	703	702	701	700	699	698	697	696	695	694	693	692	691	690	689	688	687	686	685	684	683	682	681	680	679	678	677	676	675	674	673	672	671	670	669	668	667	666	665	664	663	662	661	660	659	658	657	656	655	654	653	652	651	650	649	648	647	646	645	644	643	642	641	640	639	638	637	636	635	634	633	632	631	630	629	628	627	626	625	624	623	622	621	620	619	618	617	616	615	614	613	612	611	610	609	608	607	606	605	604	603	602	601	600	599	598	5
------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	---

Description	2021		2022		2023	
	2021	2022	2021	2022	2023	2024
Assets (1) - Non-qualified plan assets	0	0	0	0	0	0
Assets (2) - Qualified plan assets	0	0	0	0	0	0
Assets (3) - Other assets	0	0	0	0	0	0
Assets (4) - Total assets	0	0	0	0	0	0
Liabilities (1) - Non-qualified plan liabilities	0	0	0	0	0	0
Liabilities (2) - Qualified plan liabilities	0	0	0	0	0	0
Liabilities (3) - Other liabilities	0	0	0	0	0	0
Liabilities (4) - Total liabilities	0	0	0	0	0	0

Description	2021		2022		2023	
	2021	2022	2021	2022	2023	2024
Income (1) - Dividends	0	0	0	0	0	0
Income (2) - Interest	0	0	0	0	0	0
Income (3) - Other income	0	0	0	0	0	0
Income (4) - Total income	0	0	0	0	0	0
Expenses (1) - Dividends	0	0	0	0	0	0
Expenses (2) - Interest	0	0	0	0	0	0
Expenses (3) - Other expenses	0	0	0	0	0	0
Expenses (4) - Total expenses	0	0	0	0	0	0


Description	2021		2022		2023	
	2021	2022	2021	2022	2023	2024
Assets (1) - Non-qualified plan assets	0	0	0	0	0	0
Assets (2) - Qualified plan assets	0	0	0	0	0	0
Assets (3) - Other assets	0	0	0	0	0	0
Assets (4) - Total assets	0	0	0	0	0	0
Liabilities (1) - Non-qualified plan liabilities	0	0	0	0	0	0
Liabilities (2) - Qualified plan liabilities	0	0	0	0	0	0
Liabilities (3) - Other liabilities	0	0	0	0	0	0
Liabilities (4) - Total liabilities	0	0	0	0	0	0
Income (1) - Dividends	0	0	0	0	0	0
Income (2) - Interest	0	0	0	0	0	0
Income (3) - Other income	0	0	0	0	0	0
Income (4) - Total income	0	0	0	0	0	0
Expenses (1) - Dividends	0	0	0	0	0	0
Expenses (2) - Interest	0	0	0	0	0	0
Expenses (3) - Other expenses	0	0	0	0	0	0
Expenses (4) - Total expenses	0	0	0	0	0	0

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 31, 2013 at San Rafael, California.



_____, Executive Officer

(Signature and Title of Corporate Officer)