

**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)

**2014 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN OF
TIGER NATURAL GAS, INC.
(PUBLIC)**

I. INTRODUCTION

In accordance with the March 26, 2014 Assigned Commissioner’s Ruling Identifying Issues and Schedule of Review for 2014 Renewables Portfolio Standard Plans (“ACR”) and the May 29, 2014 email ruling of Administrative Law Judge (“ALJ”) DeAngelis extending the due date for the submission of such plans, Tiger Natural Gas, Inc. (“TNG”) hereby submits this 2014 Renewables Portfolio Standard Procurement Plan (“RPS Plan”). As required by the ACR, TNG’s RPS Plan consists of the information described in sections 6.1, 6.2, 6.3, 6.4, 6.6, 6.12 and 6.14 of the ACR. TNG does not have any comments on the issues in section 7 of the ACR.

In accordance with the May 21, 2014 Administrative Law Judge’s Ruling on Residual Net Short (“ALJ Ruling”), this RPS Plan also includes a Residual Net Short (“RNS”) filing in the form of the template attached as Appendix C to Attachment A of the ALJ Ruling, as well as responses to the questions posed in Appendix D to Attachment A of said ruling.

II. RPS PROCUREMENT PLAN

6.1. Assessment of RPS Portfolio Supplies and Demand - § 399.13(a)(5)(A)

TNG currently serves a relatively small portion of the state's direct access ("DA") load under contracts with annual or month-to-month terms. Absent legislation further increasing the amount of load that is eligible for DA service, TNG does not expect that portion to change significantly during the ten-year planning horizon, much less the twenty-year time frame, covered by this RPS Plan. TNG expects to meet its RPS obligations for the 2014-2017 compliance period through a mix of bundled and REC-only transactions. Similarly, TNG plans to meet its RPS obligations for future compliance periods through a mix of bundled and REC-only transactions. The exact portfolio mix will depend on the pricing that is available for various products, as well as the applicable portfolio category requirements; however, TNG anticipates that most if not all of the RPS-eligible energy procured will be from in-state resources and/or resources that have their first point of interconnection with a California balancing authority. TNG does not expect to make any capital investments in new renewable generation capacity during the planning period; however, TNG will plan to comply with the minimum long-term contracting quota, which will indirectly support the development of such capacity.

6.2. Project Development Status Update - § 399.13(a)(5)(D)

TNG has no information to report in this section, as TNG has not entered into any contracts with facilities that are not yet in commercial operation.

6.3. Potential Compliance Delays - § 399.13(a)(5)(B)

Given the straightforward nature of TNG's RPS procurement strategy (see Section 1 above), TNG does not anticipate any compliance delays for the 2014-2017 compliance period. If, however, fundamental barriers to the development of new renewable generation facilities that may be needed to meet the state's overall 33% RPS goal arise during the 2014-2033 period, any

corresponding deficiency in the overall amount of RPS products could possibly result in compliance delays for TNG. If and when any such potential compliance delays become evident, TNG will identify those barriers and address in future RPS Procurement Plans the steps it plans to take to account for and minimize their impact on the company's RPS compliance.¹

6.4. Risk Assessment - § 399.13(a)(5)(F)

TNG has no information to report in this section, as TNG has not entered into any contracts with facilities that are not yet in commercial operation.

6.6. “Minimum Margin of Procurement” - § 399.13(a)(4)(D)

TNG has no information to report in this section, as TNG has not entered into any contracts with facilities that are not yet in commercial operation.

6.12. Important Changes to Plans Noted

TNG has not made any important changes in this RPS plan as compared to the company's 2013 RPS Plan.

6.14. Safety Considerations

Given that TNG does not own, operate or control any RPS-eligible generation facilities, the company's RPS plan does not give rise to any safety considerations.

¹ TNG encountered unexpected difficulty at the end of 2013 in purchasing the additional bundled RPS products needed to meet its residual RPS compliance obligations for the 2011-2013 compliance period. At that time, TNG was informed by the company's procurement agents that Category 2 and Category 1 products had been largely if not completely bought up by the end of September and the end of November, respectively. In light of that experience, TNG will endeavor to purchase sufficient RPS products to meet all of its estimated residual RPS obligations for the 2014-2017 compliance period earlier in the last year of the compliance period.

III. RESPONSES TO ALJ QUESTIONS

RPS Compliance Risk

1. **How do current and historical performance of online resources in your RPS portfolio impact future projections of RPS deliveries and your subsequent RNS?**

There is no impact, as TNG currently does not have any RPS contracts with forward delivery obligations that are dependent on the performance of a specific RPS-eligible generator.

2. **Do you anticipate any future changes to the current bundled retail sales forecast? If so, describe how the anticipated changes impact the RNS.**

As a non-utility retail seller, TNG does not forecast “bundled retail sales.”

3. **Do you expect curtailment of RPS projects to impact your projected RPS deliveries and subsequent RNS?**

No, unless the impact is so large as to impair the ability of non-utility retail sellers to meet their RPS obligations.

4. **Are there any significant changes to the success rate of individual RPS projects that impact the RNS?**

TNG has no information on this subject.

5. **As projects in development move towards their COD, are there any changes to the expected RPS deliveries? If so, how do these changes impact the RNS?**

TNG has no information on this subject.

RECs above the Procurement Quantity Requirement

6. **What is the appropriate amount of RECs above the PQR to maintain? Please provide a quantitative justification and elaborate on the need for maintaining banked RECs above the PQR.**

This topic is not applicable to TNG, as the company is not under any requirement to procure RECs in excess of the company’s RPS obligations.

7. **What are your strategies for short-term management (10 years forward) and long-term management (10-20 years forward) of RECs above the PQR? Please discuss any plans to use RECs above the PQR for future RPS compliance and/or to sell RECs above the PQR.**

See response to Question 6.

Voluntary Margin of Over-Procurement

8. **Provide VMOP on both a short-term (10 years forward) and long-term (10-20 years forward) basis. This should include a discussion of all risk factors and a quantitative justification for the amount of VMOP.**

See response to Question 6.

9. **Please address the cost-effectiveness of different methods for meeting any projected VMOP procurement need, including application of forecast RECs above the PQR.**

See response to Question 6.

Cost-effectiveness

10. **Are there cost-effective opportunities to use banked RECs above the PQR for future RPS compliance in lieu of additional RPS procurement to meet the RNS?**

TNG currently has no opinion on this topic.

11. **How does your current RNS fit within the regulatory limitations for PCCs? Are there opportunities to optimize your portfolio by procuring RECs across different PCCs?**

TNG currently has no opinion on this topic.

IV. CONFIDENTIALITY

Ordering Paragraph 9 of Decision (“D.”) 08-04-023 provides that “An ESP or IOU need not seek confidentiality of regular compliance filings every time it files, but only the first time. The ESP or IOU may simply cite a prior ruling or motion when making subsequent compliance filings.” On June 27, 2013, TNG filed a motion to file the company’s 2013 RPS Plan under seal, wherein TNG requested, pursuant to D.06-06-006 the ESP Matrix (as modified by D.08-04-023),

that the Commission maintain the confidentiality of certain information set forth in the 2013 RPS Plan. TNG's 2013 RPS Plan was approved in D.13-11-024. TNG cites the aforesaid motion in requesting confidential treatment for such information as has been redacted in the Public version of this RPS Plan.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "R. F. Smith". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

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June 11, 2014

Variable	Calculation	Item	Deficit from RPS prior to Reporting Year	2011 Actuals	2012 Actuals	2013 Actuals	2014 Forecast	2015 Forecast	2016 Forecast	2014-2016
		Forecast Year								CPI
		Annual RPS Requirement								
A		Blindfold Retail Sales Forecast (LTPP)		24,794	32,569					
B		RPS Procurement Quantity Requirement (%)								
C	A*B	Gross RPS Procurement Quantity Requirement (GWh)								
D		Voluntary Margin of Over-procurement								
E	C+D	Net RPS Procurement Need (GWh)								
		RPS-Eligible Procurement								
Fa		Risk-Adjusted RECs from Online Generation		-	5,148					
Faa		Forecast Failure Rate for Online Generation (%)								
Fb		Risk-Adjusted RECs from RPS Facilities in Development								
Fbb		Forecast Failure Rate for RPS Facilities in Development (%)								
Fc		Pre-Approved Generic RECs								
Fd		Executed REC Sales								
F	Fa + Fb + Fc - Fd	Total RPS Eligible Procurement (GWh)		-	5,148					
F0		Category 0 RECs		-	-					
F1		Category 1 RECs		-	4,048					
F2		Category 2 RECs		-	-					
F3		Category 3 RECs		-	1,100					
		Gross RPS Position (Physical Net Short)								
Ga	F-E	Annual Gross RPS Position (GWh)		0	5,148					
Gb	F/A	Annual Gross RPS Position (%)		0	15.8					
		Application of Bank								
Ha	H - Hc (from previous year)	Existing Banked RECs above the PQR								
Hb		RECs above the PQR added to Bank								
Hc		Non-bankable RECs above the PQR								
H	Ha+Hb	Gross Balance of RECs above the PQR								
Ia		Planned Application of RECs above the PQR towards RPS Compliance								
Ib		Planned Sales of RECs above the PQR								
J	Ia-Ib	Net Balance of RECs above the PQR								
J0		Category 0 RECs								
J1		Category 1 RECs								
J2		Category 2 RECs								
		Expiring Contracts								
K		RECs from Expiring RPS Contracts								
		Net RPS Position (Optimized Net Short)								
La	$\frac{G_a + H_b - I_a - J_0 - J_1 - J_2}{A}$	Annual Net RPS Position after Bank Optimization (GWh)		-	5,148					
Lb	$\frac{G_b + H_c - I_a - J_0 - J_1 - J_2}{A}$	Annual Net RPS Position after Bank Optimization (%)		-	15.8					

Note: Fields in grey are protected as Confidential under CPUC Confidentiality Rules

Note: Values are shown in GWhs

Facility Name	Technology	Contract Expiration Date	MW	Expected Annual Generation (GWh)	Location	PCC Classification
Unspecified	Unspecified	2022 N/A		50 MWh	Unspecified	Category 3

VERIFICATION

I, Gregory S. G. Klatt, attorney for Tiger Natural Gas, Inc., am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing 2014 Renewables Portfolio Standard Procurement Plan filed in Rulemaking 11-05-005 are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

Executed on June 11, 2014, at Woodland Hills, California.



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