

**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  
EDF INDUSTRIAL POWER SERVICES (CA), LLC  
(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, EDF Industrial Power Services (CA), LLC (“EDF”) hereby submits this 2014 Renewables Portfolio Standard Procurement Plan (“RPS Plan”). As required by the ACR, EDF’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. EDF 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)**

EDF 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, EDF 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. EDF expects to meet its RPS obligations for the 2014-2017 compliance period through a mix of bundled and REC-only transactions. Similarly, EDF 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, EDF 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. EDF does not expect to make any capital investments in new renewable generation capacity during the planning period; however, EDF 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)**

EDF has no information to report in this section, as EDF 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 EDF's RPS procurement strategy (see Section 1 above), EDF 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 EDF. If and when any such potential compliance delays become evident, EDF 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.

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

EDF has no information to report in this section, as EDF 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)**

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

**6.12. Important Changes to Plans Noted**

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

### 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 EDF 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, EDF 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?**

EDF 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?**

EDF 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 EDF, 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?**

EDF 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?**

EDF 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 28, 2013, EDF filed a motion to file the company’s 2013 RPS Plan under seal, wherein EDF requested, pursuant to D.06-06-006 and the ESP Matrix, that the Commission maintain the confidentiality of certain information set forth in the 2013 RPS Plan, which motion was granted in D.13-11-024. EDF cites the aforesaid motion in requesting confidential treatment for the information redacted in the Public version of this RPS Plan.

Respectfully submitted,

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| Variable                                       | Calculation                 | Forecast Year | Item   | Deficit from RPS prior to Reporting Year | 2011 Actuals | 2012 Actuals | 2013 Actuals | 2011-2013 | 2014 Forecast | 2015 Forecast | 2016 Forecast | 2014-2016 |
|--|-----------------------------|---------------|--|--|--------------|--------------|--------------|-----------|---------------|---------------|---------------|-----------|
|  |                             | Forecast Year |  |  |              |              |              | CPI       | 1             | 2             | 3             | CPI2      |
| <b>Annual RPS Requirement</b>                  |                             |               |  |  |              |              |              |           |               |               |               |           |
| A  |                             |               | Bundled Retail Sales Forecast (LTPP)                             | -  |              |              |              |           |               |               |               |           |
| B  |                             |               | RPS Procurement Quantity Requirement (%)                         |  |              |              |              | 2010      | 2011          | 2012          | 2013          | 2014      |
| C  | A*B                         |               | Gross RPS Procurement Quantity Requirement (GWh)                 | -  |              |              |              |           |               |               |               |           |
| D  |                             |               | Voluntary Margin of Over-procurement                             |  |              |              |              |           |               |               |               |           |
| E  | C+D                         |               | Net RPS Procurement Need (GWh)                                   |  |              |              |              |           |               |               |               |           |
| <b>RPS-Eligible Procurement</b>                |                             |               |  |  |              |              |              |           |               |               |               |           |
| Fa   |                             |               | Risk-Adjusted RECs from Online Generation                        |  |              |              |              |           |               |               |               |           |
| 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)                             |  |              |              |              |           |               |               |               |           |
| F0   |                             |               | Category 0 RECs  |  |              |              |              |           |               |               |               |           |
| F1   |                             |               | Category 1 RECs  |  |              |              |              |           |               |               |               |           |
| F2   |                             |               | Category 2 RECs  |  |              |              |              |           |               |               |               |           |
| F3   |                             |               | Category 3 RECs  |  |              |              |              |           |               |               |               |           |
| <b>Gross RPS Position (Physical Net Short)</b> |                             |               |  |  |              |              |              |           |               |               |               |           |
| Ga   | F-E                         |               | Annual Gross RPS Position (GWh)                                  |  |              |              |              |           |               |               |               |           |
| Gb   | F/A                         |               | Annual Gross RPS Position (%)                                    |  |              |              |              |           |               |               |               |           |
| <b>Application of Bank</b>                     |                             |               |  |  |              |              |              |           |               |               |               |           |
| 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  | H-Ia-Ib                     |               | Net Balance of RECs above the PQR                                |  |              |              |              |           |               |               |               |           |
| J0   |                             |               | Category 0 RECs  |  |              |              |              |           |               |               |               |           |
| J1   |                             |               | Category 1 RECs  |  |              |              |              |           |               |               |               |           |
| J2   |                             |               | Category 2 RECs  |  |              |              |              |           |               |               |               |           |
| <b>Expiring Contracts</b>                      |                             |               |  |  |              |              |              |           |               |               |               |           |
| K  |                             |               | RECs from Expiring RPS Contracts                                 |  |              |              |              |           |               |               |               |           |
| <b>Net RPS Position (Optimized Net Short)</b>  |                             |               |  |  |              |              |              |           |               |               |               |           |
| La   | Ga + Ia - J0 - J1 - J2      |               | Annual Net RPS Position after Bank Optimization (GWh)            |  |              |              |              |           |               |               |               |           |
| Lb   | (F + Fb - Fc - Fd) / A      |               | Annual Net RPS Position after Bank Optimization (%)              |  |              |              |              |           |               |               |               |           |

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 |
|---------------------------|-------------|--------------------------|----|----------------------------------|-------------|--------------------|
| Neal Hot Springs - Unit 1 | Geothermal  | 12/31/2014               |    | 3.2                              | Oregon      | PCC2               |
| Unspecified               | Unspecified | 12/31/2014               |    | 20.625                           | Unspecified | PCC2               |
| Unspecified               | Unspecified | 12/31/2014               |    | 17.93                            | Unspecified | PCC3               |
| Unspecified               | Unspecified | 12/31/2015               |    | 77                               | Unspecified | PCC1               |
| Unspecified               | Unspecified | 12/31/2023               |    | 0.03                             | Unspecified | PCC3               |

## VERIFICATION

I, Gregory S. G. Klatt, attorney for EDF Industrial Power Services (CA), LLC, 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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