

## Praxair Plainfield, Inc., 2013 Preliminary Annual 33% RPS Compliance Report Narrative Reporting Requirements

In accordance with Public Utilities Code Section 399.13(a)(3) and the “Instructions” tab of the 2013 Preliminary Annual 33% RPS Compliance Report template, Praxair Plainfield, Inc. (“Plainfield”) provides the following narrative response along with its 2013 Preliminary Annual 33% RPS 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.

**Response:** Plainfield has not served any retail customers since 2008 and has no renewable procurement.

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

**Response:** Plainfield has not served any retail customers since 2008 and has no renewable procurement from eligible renewable energy resources located outside California and within the WECC.

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

**Response:** Plainfield has not served any retail customers since 2008 and has no renewable procurement.

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

**Response:** Plainfield has no comments at this time, but respectfully reiterates its request, made in its June 11, 2012 RPS Plan filing<sup>1</sup> as well as its July 17, 2013 Motion for a Provisional Waiver from Future RPS Compliance Requirements<sup>2</sup> that it be granted a “provisional waiver” for the submission of any RPS-related compliance filings as a registered ESP until such time as it resumes making retail sales. Plainfield intends to maintain its ESP Registration, but at present does not anticipate serving retail loads, and believes that submission of compliance materials showing no loads or associated procurement obligations would not harm the Commission process or the public interest, and would be administratively efficient.

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<sup>1</sup> See, <http://docs.cpuc.ca.gov/PublishedDocs/EFILE/RESP/169241.PDF>.

<sup>2</sup> See, <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M075/K728/75728595.PDF>.