

**Commercial Energy of California's 2013 Preliminary Annual 33% Compliance Report
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.

Response: Commercial has not contracted with any renewable facilities that are not yet online.

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. 2013 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.

Response: Please refer to Table 1 that lists all procurement from facilities that are certified by the California Energy Commission that are located outside of California and within WECC.

Table 1			
Facility Name	Facility City	Facility State	RECs Procured (2013)
Middle Fork Irrigation District - Hydro system	Parkdale	Oregon	2039
Copper Dam Plant - Plant 2 (Units 1& 2)	Hood River	Orgeon	1466
Peters Drive Dam - Plant 3	Hood River	Orgeon	534

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. 2013 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.

Response: All unbundled RECs procured for the period were generated at the out of state facilities and in the volumes detailed in Table 1 above.

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: Commercial requests to reserve the opportunity to file a waiver request for the period following the Final Rulemaking on Compliance and Enforcement Issues.