

Liberty Power Holdings LLC 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, Liberty Power Holdings LLC (“Liberty Power”) 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:

Liberty Power has no procurement from any facilities 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.

Response:

The table below lists the eligible renewable energy resources located outside of California and within the WECC. Additional details about the resources listed below, and other resources, may be found on the “Procurement Detail” and “RECs Retired to meet PQR” tabs of Liberty Power’s 2013 Preliminary Annual 33% RPS Compliance Report.

Facility	Facility Location (City, State)	2013 RECs Procured
White Creek Wind 1 - White Creek	Klickitat, WA	14,200
Post Falls HED - Post Falls 4	Kootenai, ID	2,635

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

Response:

The table below lists procurement of unbundled renewable energy credits included in Liberty Power's 2013 Preliminary Annual 33% RPS Compliance Report. Additional details about the procurement listed below may be found on the "Procurement Detail" and "RECs Retired to meet PQR" tabs of Liberty Power's 2013 Preliminary Annual 33% RPS Compliance Report.

Facility	Facility Location (City, State)	2013 RECs Procured
Post Falls HED - Post Falls 4	Kootenai, ID	2,635
Total Energy Facility - TEF - GEN2	Carson, CA	1,741
Total Energy Facility - TEF - GEN3	Carson, CA	1,741
LSD - Endeavour JB-935142-00 - LSD - Endeavour JB-935142-00	Lancaster, CA	8
LSD - Jack Northup JB-935137-00 - LSD - Jack Northup JB-935137-00	Lancaster, CA	38
LSD - Piute 2/2 JB-935146-00 - LSD - Piute 2/2 JB-935146-00	Lancaster, CA	40
Sonoma County Family YMCA JB-954059-00 - Sonoma County Family YMCA JB-954059-00	Santa Rosa, CA	24
Total Energy Facility - TEF - GEN2	Carson, CA	102
Woodland Joint USD - Plainfield JB-9561362-00 - Woodland Joint USD-Plainfield Elementary	Woodland, CA	10
Chico USD, Hank Marsh Jr HS JB-959121-00 - Chico USD, Hank Marsh Jr High	Chico, CA	17

School JB-959121-00		
City of Lancaster - Maintenance Yard JB-935034-00 - City of Lancaster - Maintenance Yard JB-935034-00	Lancaster, CA	1
City of Lancaster - PAC JB-935033-00 - City of Lancaster - PAC JB-935033-00	Lancaster, CA	18
LSD - West Wind JB-935149-00 - LSD - West Wind JB-935149-00	Lancaster, CA	27
Sonoma Country Day School JB-954088-00 - Sonoma Country Day School JB-954088-00	Santa Rosa, CA	23
Sonoma County Family YMCA JB-954059-00 - Sonoma County Family YMCA JB-954059-00	Santa Rosa, CA	14
Woodland Joint USD - Pioneer HS JB-9561359-00 - Woodland Joint USD - Pioneer HS JB-9561359-00	Woodland, CA	23
Woodland Joint USD Zamora Elementary JB-9561361-00 - Woodland Joint USD Zamora Elementary JB-9561361-00	Woodland, CA	7

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:

Liberty Power believes that implementing all aspects of the RPS program, such as enforcement and waiver processes, prior to retail sellers having to comply with the program will help ensure that there are fewer impediments and complications in making progress toward achieving the renewable energy resources procurement requirements. Noncompliance penalties should not be assessed until the enforcement process has been finalized and in place.