

## Noble Americas Energy Solutions LLC 2014 Preliminary Annual 33% RPS Compliance Report

### Narrative Reporting Requirements

#### I. Introduction

The following sets forth the supplementary material needed to meet the requirements set forth in Public Utilities Code Section 399.13(a)(3) for Noble Americas Energy Solutions LLC's Preliminary Annual 33% RPS Compliance Report.

#### II. Narrative Reporting Requirements – Eligible Renewable Energy Resources

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:

Noble Americas Energy Solutions LLC ("Noble Solutions") is informed and believes that all the necessary siting and permitting approvals from federal, state, and local agencies for those eligible renewable energy resources procured by Noble Solutions that have not yet attained their commercial on-line dates have been obtained.

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. 2014 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:

The following list identifies the facilities that are certified by the California Energy Commission that are located outside of California and within the WECC that were included in Noble Solutions' 2014 Preliminary Annual 33% RPS Compliance Report:

Facility Name	Location	RECs Procured
Cape Scott Wind	Port Hardy, B.C.	123,598
Dokie Ridge	Chetwynd, B.C.	39,537
Juniper Canyon	Klickitat, WA	50,443
Kettle Falls Woodwaste Plant	Stevens, WA	4,987
Leaning Juniper II	Gilliam, OR	68,989
Quality Wind	Tumbler Ridge, B.C.	148,237
Red Mesa Wind	Seboyeta, NM	154,143
Roosevelt Biogas	Roosevelt, WA	21,639
Vansycle II Wind Energy Center	Athena, OR	94,669
Wheatfield	Arlington, OR	36,376

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. 2014 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:

The following list identifies the facilities that are certified by the California Energy Commission from which procurement of unbundled renewable energy credits was included in Noble Solutions' 2014 Preliminary Annual 33% RPS Compliance Report:

Facility Name	Location	RECs Procured
Foote Creek I	Carbon, WY	10,756
Harvest Wind	Klickitat, WA	1,510
Meadow Creek Wind Farm	Bonneville, WA	85,042
Middle Fork Irrigation District	Hood River, OR	1,387
Rolling Hills - Rolling Hills	Converse, WY	4,495
Seven Mile Hill I	Carbon, WY	2,188
Top of the World	Converse, WY	980

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:

Noble Solutions offers the following specific recommendation: The Commission should provide non-IOU retail sellers a voluntary process in which the non-IOU retail seller can ask, on a contract-by-contract basis, that a preliminary Product Content Category determination be provided by the Commission. This voluntary process would help remove regulatory uncertainties that currently exist due to the timeline of the current RPS verification process. Currently, RPS Product Content Category determination is completed by the Commission well after the RPS contracts are executed and the RPS energy is delivered. In fact, the RPS Product Content Category determination(s) is expected take place at the end of the 3-year compliance period(s). This lag between contract execution and energy delivery versus Product Content Category determination is creating regulatory uncertainty and is impeding commercial activities related to RPS procurement.

### III. Additional Narrative Reporting Requirements – Transmission Planning

Each retail seller that is also an electrical corporation must, in addition to the four items set forth above, include the following narrative information in each annual compliance report and in the final report for each compliance period:

1. The current status and progress made during the prior year toward construction of, and upgrades to, transmission and distribution facilities and other electrical system components owned by that electrical corporation to interconnect eligible renewable energy resources and to supply the electricity generated by those resources to load. The narrative must specifically include, but is not limited to, the status of planning, siting, and permitting of transmission facilities by federal, state, and local agencies. If a retail seller does not currently own any transmission lines, describe any plans to own transmission lines in the future, if at all.

Response:

This question does not apply to Noble Solutions. Noble Solutions is not an electrical corporation.