

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue
Implementation and Administration, and
Consider Further Development, of California
Renewables Portfolio Standard Program.

Rulemaking 15-02-020
(Filed February 26, 2015)

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933-E)'s NARRATIVE
REPORTING PORTION OF THE 2014 PRELIMINARY ANNUAL 33% RPS
COMPLIANCE REPORT**

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**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
(Issued May 10, 2011)

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933-E)'s NARRATIVE
REPORTING PORTION OF THE 2014 PRELIMINARY ANNUAL 33% RPS
COMPLIANCE REPORT**

Pursuant to Public Utilities Code Section 399.13(a)(3) and the *Energy Division
Director's Response to Requests for Extension of the August 3, 2015, Renewable Portfolios
Standard Annual Compliance Submission*,¹ Liberty Utilities (CalPeco Electric) LLC (U 933-E)
("Liberty Utilities") provides the following narrative information with its 2014 Preliminary
Annual 33% Compliance Report.

I. NARRATIVE REPORTING REQUIREMENTS

A. Narrative Reporting Requirements for all Retail Sellers

- 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.**

Liberty Utilities has no contracts to purchase any Renewable Portfolio Standards ("RPS") power from resources that are in the development and/or construction stage and thus there are no "necessary siting and permitting approvals" associated with its current procurement of RPS power.

¹ July 17, 2015 *Energy Division Director's Response to Requests for Extension of the August 3, 2015, Renewable Portfolios Standard Annual Compliance Submission* (extended the deadline to September 4, 2015).

2. Identification of all procurement from eligible renewable energy resources located outside California and within the Western Electricity Coordinating Council (“WECC”) during the period covered by the report.

The vast majority, and potentially all, of Liberty Utilities’ RPS procurement from NV Energy, comes from eligible geothermal facilities located outside California and within the WECC. NV Energy will identify the specific facilities when it actually transfers the Renewable Energy Credits (“RECs”) to Liberty Utilities’ Western Renewable Energy Generation Information System (“WREGIS”) account. However, at this time Liberty Utilities is unable to identify the specific 2014 procurement from each specific facility. As noted in the spreadsheet, all of Liberty Utilities’ RPS procurement from NV Energy in 2014 came from geothermal facilities.

3. Identification of all procurement of unbundled RECs during the period covered by the report.

All of Liberty Utilities’ procurement from NV Energy is for bundled energy with the associated RECs.

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

Liberty Utilities has no recommendations at this time.

B. Narrative Reporting Requirements for Electrical Corporations

- 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.**

Liberty Utilities owns no FERC-jurisdictional transmission facilities. Liberty Utilities has undertaken distribution facility improvements and upgrades in its service territory in the past year. The Commission recently approved Liberty Utilities Application 10-08-024 in Decision 15-03-020 and as a result Liberty Utilities has begun to upgrade its existing distribution facilities surrounding Lake Tahoe. However, it has undertaken no specific construction of, or upgrade to, distribution facilities and other electrical system components in order to interconnect eligible renewable energy resources and to supply the electricity generated by those resources to load.