

Commerce Energy, Inc. 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 Commerce Energy's 2014 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:

Commerce Energy 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 "(2014) 36 Month Retirement" tabs of Commerce Energy's 2014 Preliminary Annual 33% RPS Compliance Report.

Facility	Facility Location (City, State)	2014 RECs Procured
Falls Creek Hydroelectric Project, LP.	Sweet Home, OR	4,000
Vansycle II	Umatilla County, OR	30,000

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 Commerce Energy's 2014 Preliminary Annual 33% RPS Compliance Report. Additional details about the procurement listed below may be found on the "Procurement Detail" and "(2014) 36 Month Retirement" tabs of Commerce Energy's 2014 Preliminary Annual 33% RPS Compliance Report.

Facility	Facility Location (City, State)	2014 RECs Procured
Falls Creek Hydroelectric Project, L.P.	Sweet Home, OR	4,000

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:

Commerce Energy believes that additional flexible compliance options should be made available to help retail sellers ensure they meet their RPS procurement obligations. Additionally, clarity surrounding the RPS enforcement and waiver process should be provided.