

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 15-02-020
(Filed August 17, 2015)

Liberty Power Delaware LLC

Preliminary Annual 33% RPS Compliance Report

**Reporting progress towards meeting the procurement quantity requirements for California's RPS
Program in the second compliance period (2014-2016)**

August 25, 2015

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CALIFORNIA'S RENEWABLES PORTFOLIO STANDARD

Annual 33% RPS Compliance Reporting Instructions

Annual RPS compliance reports submitted by retail sellers include qualitative and quantitative elements, as required by the Public Utilities Code 399.13 and Commission decisions, notably, Decision (D.) 11-12-020, D.11-12-052, D.12-06-038 and D.14-12-023. Specific procedural guidelines, reporting requirements and general explanations about the RPS compliance spreadsheet are detailed below. Any questions concerning RPS compliance matters should be directed to Robert Blackney robert.blackney@cpuc.ca.gov, (415) 703-3072.

Procedural Guidelines

1. D.11-12-052 requires Investor Owned Utilities (IOU), Multi-Jurisdictional Utilities (MJU), Electric Service Providers (ESP), and Community Choice Aggregators (CCAs) to submit information to Energy Division sufficient to demonstrate that renewable energy credits (RECs) retired to meet an obligation of the California renewable portfolio standard meet the requirements of the portfolio content category (PCC) classification in which they are claimed. Consequently, retail sellers must submit this hourly e-Tag summary report to determine the proper PCC classification of RECs generated from facilities located outside of a California balancing authority area. Refer to D.11-12-052 for additional details related to RPS portfolio content category classification.
2. Any retail seller seeking confidentiality protection for information required by the RPS Hourly e-Tag Summary Report should file a declaration. Confidentiality requests shall comply with the substantive and procedural rules set forth in D.06-06-066, as modified by D.08-04-023, the Commission's decision in its Confidentiality proceeding, Rulemaking (R.) 05-06-040, and any subsequent decisions issued in the same or successor proceeding. A declaration for confidentiality should identify all redacted information by tab name and cell reference.
3. RPS Hourly e-Tag Summary Reports must be submitted to the Commission as specified below:
 - a. Serve a public version on the service list in proceeding R.15-02-020. All pages must be legible: If reports need to be printed and scanned to be issued to the service list, please ensure that scanned documents are not blurry or distorted. Retail sellers are responsible for maintaining confidentiality when serving a redacted report. **The most current version of the service list can be found on the Commission's webpage :**

http://www.cpsc.ca.gov/service_lists/R1502020_82917.htm
 - b) **Submit a confidential Excel version utilizing the locked spreadsheet with the Energy Division by e-mailing an electronic version to robert.blackney@cpuc.ca.gov and rpscompliance@cpuc.ca.gov. Please only submit Excel documents in .xls format (.xlsm and .xlsx files are acceptable).**
 - c) Send paper copies (confidential and public) to each of the assigned Administrative Law Judges (ALJs):

Robert Mason and Anne Simon
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
 - d) **Do not send paper copies of the confidential version to anyone except the persons listed above, unless specifically requested.**
4. Include the Title Page and fill out the following information:
 - a) Name of the retail seller serving the Compliance Report
 - b) Date the Compliance Report is being served
 - c) Contact information
5. Complete the Officer Verification Form in the format provided (Rule 1.11)

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

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.

RPS Compliance Report Spreadsheet Instructions

General Instructions

1. Orange cells throughout the spreadsheet indicate data provided by the retail seller.
2. All data must be entered in megawatt-hours (MWh) out to three decimal points to accurately account for reported retail sales, quantity or renewable energy credits (RECs) and targets. The spreadsheet will display MWh throughout. Do not round any reporting data, as this may result in calculation errors.
3. The RPS compliance spreadsheet has locked cells to ensure accurate calculations. An unprotected version of the spreadsheet is available by request.
4. Protecting confidential data: Individual cells may be formatted black, which will serve to redact info when excel file is converted to pdf. Select cell - click on "fill color" icon - choose black. Note: Once converted to pdf, additional steps are necessary to ensure redacted data is not accessible.

Accounting tab instructions

The Accounting tab is where the primary RPS compliance calculations are made.

Information from the 20% RPS Program: 2010 retail sales figure (cells C11:D11) is needed to calculate the long-term contracting requirement for the first compliance period. Enter the "Surplus/(Deficit) Carried Forward" value from the "Provisional 20% RPS Closing Report" (cells C12:D12). Pursuant to D.12-06-038, all CA retail sellers are required to file a Closing Report to calculate their surplus/(deficit) procurement amount from the 20% RPS program.

Annual RPS Procurement and Percentages: This section calculates retail seller's annual percentage target and procurement made towards those targets, prior to the application of specific compliance rules.

Procurement Quantity Requirement: This section calculates retail seller's Procurement Quantity Requirement (PQR) for a given compliance period, and shows the total amount of RECs applied to the PQR (data sourced from the "RECs Retired to meet PQR Detail" tab).

Portfolio Balance Requirements: This section calculates (i) whether the retail seller met the minimum procurement requirement for Category 1 RECs, and (ii) whether the retail sellers procured Category 3 RECs within the limit for each compliance period.

Excess Procurement Calculation: This section calculates the quantity and classification of RECs that qualify as for excess procurement. Retail sellers will classify any RECs that qualify as excess procurement (row 57) as either a Pre-June 1, 2010 REC, a Category 1 REC or a Category 2 REC (rows 58-60).

Excess Procurement Bank: This section shows the amount of excess procurement available for future RPS compliance, and a retail seller's application of excess procurement RECs towards a procurement quantity requirement, as applicable.

RPS Compliance Status: This section shows whether or not a retail seller met its procurement quantity requirement and the deficit amount, if any. Enforcement rules for RPS compliance have yet to be determined.

Deficit from the 20% Closing Report: This section how the retail seller will satisfy its net deficit from the 20% RPS Program, as reported in the Closing Report, if any.

Procurement Detail tab

Procurement Summary: This section differentiates the reported RECs procured by classification (i.e., PCC 0, PCC 1, PCC 2 or PCC 3) and calculates whether the retail seller met the long-term contracting requirements, if any short-term (< 10 yrs) contracts were executed in a compliance period.

Contract Detail: For each contract, enter actual and forecasted data (MWh) for each year throughout the contract term. Do not assume that an expiring contract will be renegotiated.

- a) For ALL RPS Eligible Contracts: List contracts by CPUC ID Number, name, annual contracted deliveries (MWh), contract status, facility status, resource type, expected portfolio content category (i.e. PCC 1, PCC 2, etc.), contract length (i.e. short-term/long-term), whether contracted RECs are bundled/unbundled, the facility location (City and State), contract execution date, and the total MWh volume of the contract.
- b) "Contract Volume" (Column "AG") Input the total MWh over the term of the contract identified in the contract.
- c) Contract Execution Date: The date the original contract was signed. If the parties signed on different dates, or there are any contract amendments or modifications occurring after June 1, 2010, that increase the nameplate capacity or expected quantities of annual generation, or substitute a different renewable energy resource, use the most recent execution/signing date.
- d) Date of Most Recent Contract Extension: The date the most recent contract extension was signed. If a contract or ownership agreement originally signed by a retail seller as defined in Public Utilities Code Section 399.12(j) prior to June 1, 2010 is amended or modified after June 1, 2010, to increase the nameplate capacity or expected quantities of annual generation, the originally contracted procurement may be used for all compliance purposes, but the incremental procurement resulting from the amendment or modification will be subject to the then-applicable rules for portfolio balance, long-term contracting, and excess procurement.
- e) If any procurement data for a specific contract differs from what is reported to the CEC or included in an RPS Verification Report of the CEC for that year, the specific cell should be highlighted and the discrepancy should be explained.
- f) Procurement claims from contract/ownership agreements executed before June 1, 2010, or January 13, 2011 for ESPs, are not subject to the PCC classifications established in D.11-12-052. For the purposes of RPS compliance any eligible RPS RECs that are not subject to PCC 1, 2, or 3 will be placed in their own classification, that CPUC staff will henceforth refer to as PCC 0.

36 Month Retirement tab instructions

This tab includes formulas to determine the retirement deadline for all RPS RECs and whether the RECs retired "Pass" or "Fail" the requirements of the 36 month retirement limit.

CPUC ID: The identification number provided to facility by the CPUC.

RPS ID: The identification number provided to facility by the CEC.

WREGIS ID: The identification number provided to facility by WREGIS.

Facility Name: For Facilities NOT interconnected to a CBA, - Retail sellers must enter the facility's source name, as registered with OATI's webRegistry. This applies mainly to facilities not directly connected to a CBA.

Vintage Year/Month of RECs: Enter the year and month which the RECs were generation. Please create one line per combination of REC vintage and retirement date. For example RECs that have the same vintage are retired on two separate dates, please include one line per retirement date. Likewise if RECs of different vintages (e.g. June 2013 and July 2013) are retired on the same date, please include one line per vintage.

REC Retirement Date: Enter the date that RECs were retired - enter one line per vintage and retirement date combination. If RECs with the same vintage month/year are retired on separate date, please enter one line for each of the distinct retirement dates.

Last Month/Year to Retire RECs: This is a calculated field that determines the last month and year that RECs of a given vintage can be retired.

Do RECs "Pass" or "Fail" Requirements of 36 Month Rule: This is a calculated field that determines if RECs were retired within the required 36-month timeframe.

MWh REC Quantity Retired: Enter the quantity of RECs, with a given vintage and retirement date combination, that were retired for compliance.

Liberty Power Delaware LLC's 2014 Preliminary Annual 33% RPS Compliance Report
Narrative Reporting Requirements
August 25, 2015

In accordance with Public Utilities Code Section 399.13(a)(3) and the “Instructions” tab of the Preliminary Annual 33% RPS Compliance Report template, Liberty Power Delaware LLC (“Liberty Delaware”) provides the following narrative response along with its 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 Delaware 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: Liberty Delaware has no procurement from eligible renewable energy resources located outside California and within the WECC.

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

Response: Liberty Delaware has no procurement of unbundled 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.

Response: Liberty Delaware has no recommendations to remove impediments to making progress toward achieving the renewable energy resources procurement requirements as Liberty Delaware serves no load and has no procurement, renewable or otherwise.

RPS Compliance Report: 2011-2013 Compliance Period Summary

2011-13 Compliance Period
25-Aug-15

RPS Summary Report	2011 MWh	2012 MWh	2013 MWh	CP TOTAL MWh	% of Total Retail Sales
Total Retail Sales	0	0	0	0	n/a
Annual RPS Targets and Compliance Period Procurement Requirement	0	0	0	0	0.0%
Total RPS Eligible RECs Procured	0	0	0	0	0.0%
Total RPS Eligible RECs Retired	0	0	0	0	0.0%

This amount represents total procurement quantity requirement

This amount represents quantity of RECs retired for this compliance period

RPS Procurement Resource Mix

RPS Procurement (2011-13)	2011 MWh	2012 MWh	2013 MWh	CP TOTAL MWh	% of Total RPS Procurement
Biomass	0	0	0	0	0.0%
Biomethane: Digester gas	0	0	0	0	0.0%
Biomethane: Landfill gas	0	0	0	0	0.0%
Biodiesel	0	0	0	0	0.0%
Landfill Gas	0	0	0	0	0.0%
Muni Solid Waste	0	0	0	0	0.0%
Biopower Subtotal	0	0	0	0	0.0%
Geothermal	0	0	0	0	0.0%
Small Hydro	0	0	0	0	0.0%
Conduit Hydro	0	0	0	0	0.0%
Water supply and conveyance	0	0	0	0	0.0%
Solar PV	0	0	0	0	0.0%
Solar Thermal	0	0	0	0	0.0%
Wind	0	0	0	0	0.0%
Ocean wave	0	0	0	0	0.0%
Ocean thermal	0	0	0	0	0.0%
Tidal current	0	0	0	0	0.0%
Fuel Cells	0	0	0	0	0.0%
Total RPS Eligible Procurement	0	0	0	0	

Claimed Portfolio Content Category of RPS Procurement

Portfolio Content Category Retirements (2011-13)	2011 MWh	2012 MWh	2013 MWh	CP TOTAL MWh	% of Total RPS Procurement
RECs Procured from PCC 0 Eligible Resources	0	0	0	0	0.0%
RECs Procured from PCC 1 Eligible Resources	0	0	0	0	0.0%
RECs Procured from PCC 2 Eligible Resources	0	0	0	0	0.0%
RECs Procured from PCC 3 Eligible Resources	0	0	0	0	0.0%
Total	0	0	0	0	

RPS Compliance Report: 2014-2016 Compliance Period Summary

2014-16 Compliance Period
25-Aug-15

RPS Summary Report	2014 MWh	2015 MWh	2016 MWh	CP TOTAL MWh	% of Total Retail Sales
Total Retail Sales	0	0	0	0	n/a
Annual RPS Targets and Compliance Period Procurement Requirement	0	0	0	0	0.0%
Total RPS Eligible RECs Procured	0	0	0	0	0.0%
Total RPS Eligible RECs Retired	0	N/A	N/A	0	0.0%

This amount represents total procurement quantity requirement

This amount represents quantity of RECs retired for this compliance period

RPS Procurement Resource Mix

RPS Procurement (2015-2016)	2014 MWh	2015 MWh	2016 MWh	CP TOTAL MWh	% of Total RPS Procurement
Biomass	0	0	0	0	0.0%
Biomethane: Digester gas	0	0	0	0	0.0%
Biomethane: Landfill gas	0	0	0	0	0.0%
Biodiesel	0	0	0	0	0.0%
Landfill Gas	0	0	0	0	0.0%
Muni Solid Waste	0	0	0	0	0.0%
Biopower Subtotal	0	0	0	0	0.0%
Geothermal	0	0	0	0	0.0%
Small Hydro	0	0	0	0	0.0%
Conduit Hydro	0	0	0	0	0.0%
Water supply and conveyance	0	0	0	0	0.0%
Solar PV	0	0	0	0	0.0%
Solar Thermal	0	0	0	0	0.0%
Wind	0	0	0	0	0.0%
Ocean wave	0	0	0	0	0.0%
Ocean thermal	0	0	0	0	0.0%
Tidal current	0	0	0	0	0.0%
Fuel Cells	0	0	0	0	0.0%
Total RPS Eligible Procurement	0	0	0	0	

Claimed Portfolio Content Category of RPS Procurement

Portfolio Content Category Procurement (2014-2016)	2014 MWh	2015 MWh	2016 MWh	CP TOTAL MWh	% of Total RPS Procurement
RECs Procured from PCC 0 Eligible Resources	0	0	0	0	0.0%
RECs Procured from PCC 1 Eligible Resources	0	0	0	0	0.0%
RECs Procured from PCC 2 Eligible Resources	0	0	0	0	0.0%
RECs Procured from PCC 3 Eligible Resources	0	0	0	0	0.0%
Total	0	0	0	0	

Data Reported by:
Liberty Power Delaware LLC
August 25, 2015

2011-2020 Compliance Summary and Charts

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Retail Sales (MWh)	0	0	0	0	0	0	0	0	0	0
Annual % Target	20.0%	20.0%	20.0%	21.7%	23.3%	25.0%	27.0%	29.0%	31.0%	33.0%
Annual RPS Target	0	0	0	0	0	0	0	0	0	0
Procurement Quantity Requirement	0			0			0			

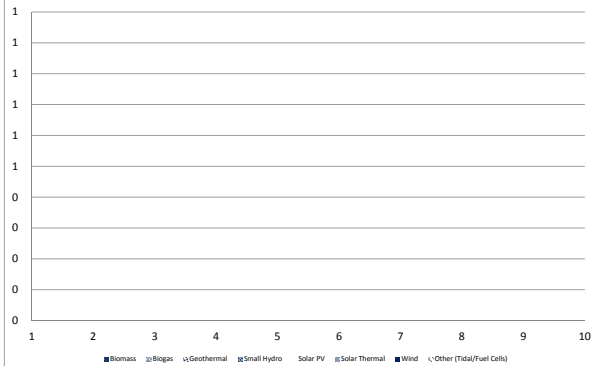
Resource Mix

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Total RPS Procurement	0	0	0	0	0	0	0	0	0	0
Biomass	0	0	0	0	0	0	0	0	0	0
Biomethane: Digester gas	0	0	0	0	0	0	0	0	0	0
Biomethane: Landfill gas	0	0	0	0	0	0	0	0	0	0
Biodiesel	0	0	0	0	0	0	0	0	0	0
Landfill Gas	0	0	0	0	0	0	0	0	0	0
Muni Solid Waste	0	0	0	0	0	0	0	0	0	0
Biopower Subtotal	0	0	0	0	0	0	0	0	0	0
Geothermal	0	0	0	0	0	0	0	0	0	0
Small Hydro	0	0	0	0	0	0	0	0	0	0
Conduit Hydro	0	0	0	0	0	0	0	0	0	0
Water supply and conveyance	0	0	0	0	0	0	0	0	0	0
Solar PV	0	0	0	0	0	0	0	0	0	0
Solar Thermal	0	0	0	0	0	0	0	0	0	0
Wind	0	0	0	0	0	0	0	0	0	0
Ocean wave	0	0	0	0	0	0	0	0	0	0
Ocean thermal	0	0	0	0	0	0	0	0	0	0
Tidal current	0	0	0	0	0	0	0	0	0	0
Fuel Cells	0	0	0	0	0	0	0	0	0	0

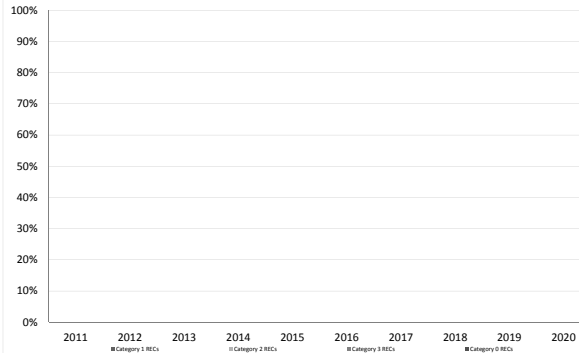
Portfolio Content Category Mix

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Category 0 RECs	0	0	0	0	0	0	0	0	0	0
Category 1 RECs	0	0	0	0	0	0	0	0	0	0
Category 2 RECs	0	0	0	0	0	0	0	0	0	0
Category 3 RECs	0	0	0	0	0	0	0	0	0	0

Resource Mix of RPS Procurement



Portfolio Content Category Mix of RPS Procurement



Data Reported by:
Liberty Power Delaware LLC
August 25, 2015

[illegible][illegible][illegible]

Annual RPS Compliance Report: (2011) 36 Month Retirement

Data Reported by:

Liberty Power Delaware LLC

August 25, 2015

Input Required

Information is Hard Coded (No Input Required)

Note : Please create one line per combination of REC vintage and REC retirement date. For example RECs that have the same vintage are retired on two separate dates, please include one line per retirement date. Likewise if RECs of different vintages (e.g. June 2013 and July 2013) are retired on the same date, please include one line per vintage.

[illegible]

Annual RPS Compliance Report: (2012) 36 Month Retirement

Data Reported by:

Liberty Power Delaware LLC

August 25, 2015

Input Required

Information is Hard Coded (No Input Required)

Note : Please create one line per combination of REC vintage and REC retirement date. For example RECs that have the same vintage are retired on two separate dates, please include one line per retirement date. Likewise if RECs of different vintages (e.g. June 2013 and July 2013) are retired on the same date, please include one line per vintage.

[illegible]

Annual RPS Compliance Report: (2013) 36 Month Retirement

Data Reported by:

Liberty Power Delaware LLC

August 25, 2015

Input Required
 Information is Hard Coded (No Input Required)

Input Required

Information is Hard Coded (No Input Required)

Note : Please create one line per combination of REC vintage and REC retirement date. For example RECs that have the same vintage are retired on two separate dates, please include one line per retirement date. Likewise if RECs of different vintages (e.g. June 2013 and July 2013) are retired on the same date, please include one line per vintage.

[illegible]

Annual RPS Compliance Report: (2014) 36 Month Retirement

Data Reported by:
Liberty Power Delaware LLC
August 25, 2015

Input Required
Information is Hard Coded (No Input)

Note : Please create one line per combination of REC vintage and REC retirement date. For example RECs that have the same vintage are retired on two separate dates, please include one line per retirement date. Likewise if RECs of different vintages (e.g. June 2013 and July 2013) are retired on the same date, please include one line per vintage.

[illegible]

Annual RPS Compliance Report: (2015) 36 Month Retirement

Data Reported by:
Liberty Power Delaware LLC
August 25, 2015

Input Required
Information is Hard Coded (No Input)

Note : Please create one line per combination of REC vintage and REC retirement date. For example RECs that have the same vintage are retired on two separate dates, please include one line per retirement date. Likewise if RECs of different vintages (e.g. June 2013 and July 2013) are retired on the same date, please include one line per vintage.

[illegible]

OFFICER VERIFICATION FORM

I am an officer of the reporting corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true. The spreadsheet format used to file this compliance report has not been altered from the version issued or approved by Energy Division.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 8-17-2015 at Fort Lauderdale, FL



[Officer of Liberty Power Delaware]