

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 February 26, 2015)

Commerce Energy, Inc.

33% RPS Compliance Report

Reporting RPS Compliance Status for the First Compliance Period (2011-2013)

PUBLIC VERSION

September 1, 2016

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First year of operation: Pre-2011

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 Compliance 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
 - d) The first year of operation for the IOU, ESP or CCA. If the first year of operation is before 2011, please use the pre-2011 option.
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.

**Commerce Energy, Inc. 2015 Preliminary Annual and First Compliance Period (2011-2013) 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 2015 Preliminary Annual and First Compliance Period (2011-2013) 33% RPS Compliance Report (“2015 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 “(2015) 36 Month Retirement” tabs of Commerce Energy’s 2015 RPS Compliance Report.

Facility	Facility Location (City, State)	2015 RECs Procured
Falls Creek Hydroelectric Project, LP.	Sweet Home, OR	2,000
Dokie Wind Energy Project	Chetwynd, BC	10,000
Biomass One, LP	White City, 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 2015 RPS Compliance Report. Additional details about the procurement listed below may be found on the "Procurement Detail" and "(2015) 36 Month Retirement" tabs of Commerce Energy's 2015 RPS Compliance Report.

Facility	Facility Location (City, State)	2014 RECs Procured
Falls Creek Hydroelectric Project, L.P.	Sweet Home, OR	2,000
Biomass One, LP	White City, OR	30,000

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.

RPS Compliance Report: 2011-2013 Compliance Period Summary

2011-13 Compliance Period
1-Sep-16

RPS Summary Report	2011 MWh	2012 MWh	2013 MWh	CP TOTAL MWh	% of Total Retail Sales
Total Retail Sales	480,269	611,914	484,485	1,576,668	n/a
Annual RPS Targets and Compliance Period Procurement Requirement	96,054	122,383	96,897	315,334	20.0%
Total RPS Eligible RECs Procured	89,000	125,000	82,000	296,000	18.8%
Total RPS Eligible RECs Retired	89,000	75,000	132,000	296,000	18.8%

This amount represents total procurement quantity requirement

This amount represents quantity of RECs retired for this compliance period

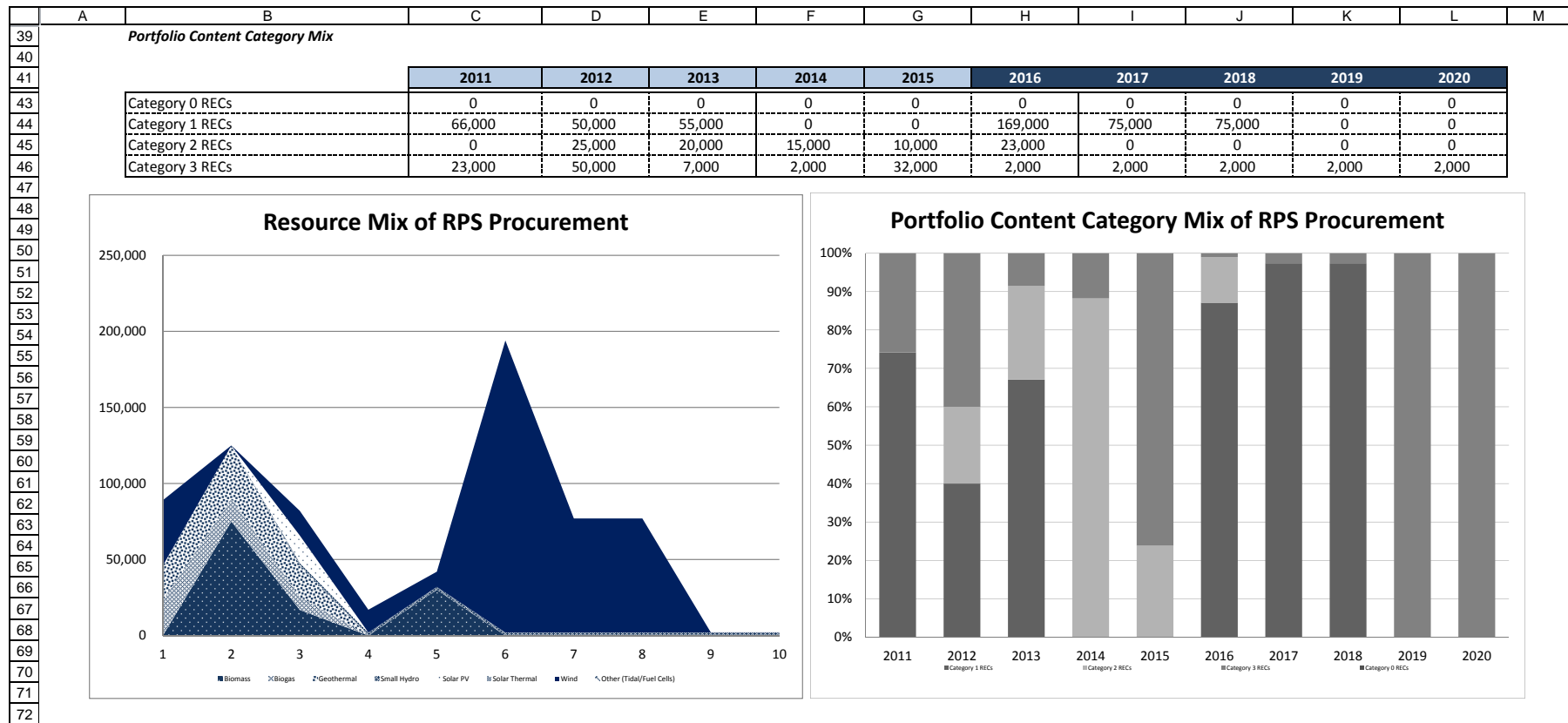
RPS Procurement Resource Mix

RPS Procurement (2011-13)	2011 MWh	2012 MWh	2013 MWh	CP TOTAL MWh	% of Total RPS Procurement
Biomass	0	75,000	16,816	91,816	31.0%
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	23,450	14,935	8,625	47,010	15.9%
Muni Solid Waste	0	0	0	0	0.0%
Biopower Subtotal	23,450	89,935	25,441	138,826	46.9%
Geothermal	22,550	35,000	20,988	78,538	26.5%
Small Hydro	0	0	1,358	1,358	0.5%
Conduit Hydro	0	0	0	0	0.0%
Water supply and conveyance	0	0	0	0	0.0%
Solar PV	0	0	18,000	18,000	6.1%
Solar Thermal	0	0	0	0	0.0%
Wind	43,000	65	16,213	59,278	20.0%
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	89,000	125,000	82,000	296,000	

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	66,000	50,000	55,000	171,000	57.8%
RECs Procured from PCC 2 Eligible Resources	0	25,000	20,000	45,000	15.2%
RECs Procured from PCC 3 Eligible Resources	23,000	50,000	7,000	80,000	27.0%
Total	89,000	125,000	82,000	296,000	

[illegible]



A	B	C	D	E	F	G	H	I	J	K	L
65											
66		Compliance Period 1			Compliance Period 2			Compliance Period 3			
67	Excess Procurement Bank (MWh)	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
68	PCC 0 Bank		0			0				N/A	
69	PCC 1 Bank		0			0				N/A	
70	PCC 2 Bank		0			0				N/A	
71	Application of PCC 0 Banked RECs		0			N/A				N/A	
72	Application of PCC 1 Banked RECs		0			N/A				N/A	
73	Application of PCC 2 Banked RECs		0			N/A				N/A	
74	Cumulative PCC 0 Bank		0			N/A				N/A	
75	Cumulative PCC 1 Bank		0			N/A				N/A	
76	Cumulative PCC 2 Bank		0			N/A				N/A	
77											
78											
79		Compliance Period 1			Compliance Period 2			Compliance Period 3			
80	RPS Compliance Status (MWh)	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
81	Additional RECs required to meet RPS Procurement Quantity Requirement		25,334			N/A				N/A	
82	Total RECs not in compliance with RPS Procurement Balance Requirement		6,000			N/A				N/A	
83											
84											
85		Compliance Period 1			Compliance Period 2			Compliance Period 3			
86	RPS Penalty Calculation	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
87	Total Penalty		\$1,266,680			N/A				N/A	
88											
89											
90	Provisional 20% Closing Report	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
91	Deficit from Provisional 20% RPS Closing Report		N/A			N/A in Compliance Period 2				N/A in Compliance Period 3	
92	PCC 0 RECs applied to PQR		0			N/A in Compliance Period 2				N/A in Compliance Period 3	
93	Long-Term PCC 1 RECs applied to PQR		0			N/A in Compliance Period 2				N/A in Compliance Period 3	
94	Short-Term PCC 1 RECs applied to PQR		171,000			N/A in Compliance Period 2				N/A in Compliance Period 3	
95	Long-Term PCC 2 RECs applied to PQR		0			N/A in Compliance Period 2				N/A in Compliance Period 3	
96	Short-Term PCC 2 RECs applied to PQR		45,000			N/A in Compliance Period 2				N/A in Compliance Period 3	
97	Long-Term PCC 3 RECs applied to PQR		0			N/A in Compliance Period 2				N/A in Compliance Period 3	
98	Short-Term PCC 3 RECs applied to PQR		80,000			N/A in Compliance Period 2				N/A in Compliance Period 3	
99	Application of PCC 0 RECs to 20% Closing Report Deficit		0			N/A in Compliance Period 2				N/A in Compliance Period 3	
100	Application of Long-term PCC 1 RECs to 20% Closing Report Deficit		0			N/A in Compliance Period 2				N/A in Compliance Period 3	
101	Application of Short-term PCC 1 RECs to 20% Closing Report Deficit		0			N/A in Compliance Period 2				N/A in Compliance Period 3	
102	Application of Long-term PCC 2 RECs to 20% Closing Report Deficit		0			N/A in Compliance Period 2				N/A in Compliance Period 3	
103	Application of Short-term PCC 2 RECs to 20% Closing Report Deficit		0			N/A in Compliance Period 2				N/A in Compliance Period 3	
104	Application of Long-term PCC 3 RECs to 20% Closing Report Deficit		0			N/A in Compliance Period 2				N/A in Compliance Period 3	
105	Application of Short-term PCC 3 RECs to 20% Closing Report Deficit		0			N/A in Compliance Period 2				N/A in Compliance Period 3	
106	Cumulative Closing Report Deficit		N/A			N/A in Compliance Period 2				N/A in Compliance Period 3	

Annual RPS Compliance Report: Procurement Detail

Data Reported by:
Commerce Energy, Inc.



Input Required
Actual Data
Forecasted Data

[illegible]

[illegible]

Annual RPS Compliance Report: (2011) 36 Month Retirement

Data Reported by:
Commerce Energy, Inc.
September 1, 2016

	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.

CPUC ID	RPS ID	WREGIS_ID	Facility Name	Expected PCC Classification	Contract Year	Contract Length	Short Term Contract Eligibility	Vintage Month/Year	Retirement Date (MM/DD/YYYY)	Last Month to Retire REC (Month/Year)	Do RECs "Pass" or "Fail" Requirements of 36 Month Rule:	MWh REC Quantity Retired
	60008A	W125	Geysers Power Plant - Calpine Geothermal U	PCC 1	2011	Short-term	Eligible Short-term	Nov-16	7/28/2013	Oct-2014	PASS	7306
	60008A	W125	Geysers Power Plant - Calpine Geothermal U	PCC 1	2011	Short-term	Eligible Short-term	Oct-16	7/28/2013	Sep-2014	PASS	7305
	60008A	W125	Geysers Power Plant - Calpine Geothermal U	PCC 1	2011	Short-term	Eligible Short-term	Dec-16	7/28/2013	Nov-2014	PASS	7939
	60942A	W823	Cassia Gulch Wind Park - Cassia Gulch Wind	PCC 1	2011	Short-term	Eligible Short-term	Jan-16	7/28/2013	Dec-2013	PASS	3657
	60942A	W823	Cassia Gulch Wind Park - Cassia Gulch Wind	PCC 1	2011	Short-term	Eligible Short-term	Feb-16	7/28/2013	Jan-2014	PASS	3566
	60942A	W823	Cassia Gulch Wind Park - Cassia Gulch Wind	PCC 1	2011	Short-term	Eligible Short-term	Mar-16	7/28/2013	Feb-2014	PASS	4575
	60942A	W823	Cassia Gulch Wind Park - Cassia Gulch Wind	PCC 1	2011	Short-term	Eligible Short-term	Apr-16	7/28/2013	Mar-2014	PASS	1731
	60943A	W822	Cassia Wind Farm - Cassia Wind Farm LLC	PCC 1	2011	Short-term	Eligible Short-term	Mar-16	7/28/2013	Feb-2014	PASS	2469
	60943A	W822	Cassia Wind Farm - Cassia Wind Farm LLC	PCC 1	2011	Short-term	Eligible Short-term	Feb-16	7/28/2013	Jan-2014	PASS	2015
	60943A	W822	Cassia Wind Farm - Cassia Wind Farm LLC	PCC 1	2011	Short-term	Eligible Short-term	Jan-16	7/28/2013	Dec-2013	PASS	1987
	61064A	W1809	Pastoria Energy Facility - LEBEC	PCC 1	2011	Short-term	Eligible Short-term	Sep-16	7/28/2013	Aug-2014	PASS	2000
	61064A	W1809	Pastoria Energy Facility - LEBEC	PCC 1	2011	Short-term	Eligible Short-term	Oct-11	7/28/2013	Sep-2014	PASS	5544
	61064A	W1809	Pastoria Energy Facility - LEBEC	PCC 1	2011	Short-term	Eligible Short-term	Dec-11	7/28/2013	Nov-2014	PASS	7986
	61064A	W1809	Pastoria Energy Facility - LEBEC	PCC 1	2011	Short-term	Eligible Short-term	Nov-11	7/28/2013	Oct-2014	PASS	7920
	60721A	W360	Nextera - White Creek 1 (Wind)	PCC 3	2011	Short-term	Eligible Short-term	Feb-11	12/29/2011	Dec-2013	PASS	699
	60721A	W360	Nextera - White Creek 1 (Wind)	PCC 3	2011	Short-term	Eligible Short-term	Mar-11	12/29/2011	Dec-2013	PASS	695
	60721A	W360	Nextera - White Creek 1 (Wind)	PCC 3	2011	Short-term	Eligible Short-term	01/2011	12/29/2011	Dec-2013	PASS	766
	61200A	W1689	Nextera - Leaning Juniper (Wind)	PCC 3	2011	Short-term	Eligible Short-term	Jul-11	12/29/2011	Dec-2013	PASS	20840

Annual RPS Compliance Report: (2013) 36 Month Retirement

Data Reported by:		Input Required	Input Required
Commerce Energy, Inc.		Information is Hard Coded (No Input Required)	Information is Hard Coded (No Input Required)
September 1, 2016			

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.

CPUC ID	RPS ID	WREGIS_ID	Facility Name	Expected PCC Classification	Contract Year	Contract Length	Short Term Contract Eligibility	Vintage Month/Year	Retirement Date (MM/DD/YYYY)	Last Month to Retire REC (Month/Year)	Do RECs "Pass" or "Fail" Requirements of 36 Month Rule:	MWh REC Quantity Retired
	61751A	W1010	Black Butte Hydro - Black Butte Hydro	PCC 1	2013	Short-term	Eligible Short-term	2013/12/1	6/30/2014	Nov-16	PASS	5
	60652C	W3591	Campo Verde Solar Project - Campo Verde Solar	PCC 1	2013	Short-term	Eligible Short-term	2013/11/1	6/30/2014	Oct-16	PASS	18,000
	60272A	W981	CRES - Community Renewable Energy Services dba Dinuba	PCC 1	2013	Short-term	Eligible Short-term	2013/11/1	6/30/2014	Oct-16	PASS	6,607
	60272A	W981	CRES - Community Renewable Energy Services dba Dinuba	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	2,760
	60272A	W981	CRES - Community Renewable Energy Services dba Dinuba	PCC 1	2013	Short-term	Eligible Short-term	2013/12/1	6/30/2014	Nov-16	PASS	7,449
	61360A	W1992	Dokie Wind - Dokie Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	8
	61360A	W1992	Dokie Wind - Dokie Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	33
	61360A	W1992	Dokie Wind - Dokie Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	38
	61360A	W1992	Dokie Wind - Dokie Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/11/1	6/30/2014	Oct-16	PASS	12
	61360A	W1992	Dokie Wind - Dokie Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	27
	61360A	W1992	Dokie Wind - Dokie Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	6
	61360A	W1992	Dokie Wind - Dokie Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	1
	61360A	W1992	Dokie Wind - Dokie Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	1
	61360A	W1992	Dokie Wind - Dokie Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	21
	61206A	W1565	G2 Energy Ostrom Rd - G2 Energy Ostrom RD	PCC 1	2013	Short-term	Eligible Short-term	2013/12/1	6/30/2014	Nov-16	PASS	974
	62040A	W1255	Geothermal 1 Unit 2 - Geothermal 1	PCC 1	2013	Short-term	Eligible Short-term	2013/12/1	6/30/2014	Nov-16	PASS	501
	62040A	W1256	Geothermal 2 Unit 3 - Geothermal2	PCC 1	2013	Short-term	Eligible Short-term	2013/12/1	6/30/2014	Nov-16	PASS	487
	61935A	W1252	Grizzly Powerhouse - GRIZZLY 1 UNIT1	PCC 1	2013	Short-term	Eligible Short-term	2013/12/1	6/30/2014	Nov-16	PASS	911
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/11/1	6/30/2014	Oct-16	PASS	1
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	406
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	408
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/11/1	6/30/2014	Oct-16	PASS	1
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/11/1	6/30/2014	Oct-16	PASS	1
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	384
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	802
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	408
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	478
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	422
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	854
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	419
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	432
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	386

	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	1
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	8
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	928
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	456
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	423
	60974A	W2398	Roosevelt Biogas 1 - LFG Engines 7-9 - LFG Phase II	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	432
	62427A	W3155	Neal Hot Springs Unit #1 - Neal Hot Springs Geothermal	PCC 2	2013	Short-term	Eligible Short-term	2013/11/1	6/30/2014	Oct-16	PASS	3,994
	62427A	W3155	Neal Hot Springs Unit #1 - Neal Hot Springs Geothermal	PCC 2	2013	Short-term	Eligible Short-term	2013/12/1	6/30/2014	Nov-16	PASS	16,006
	62006A	W3185	Meadow Creek Wind Farm - North Point Wind Farm	PCC 3	2013	Short-term	Eligible Short-term	2013/02/1	6/30/2014	Jan-16	PASS	7,000
	61555A	W2779	Pacific Wind, LLC - Pacific Wind, LLC	PCC 1	2013	Short-term	Eligible Short-term	2013/12/1	6/30/2014	Nov-16	PASS	8,680
	62247A	W3160	Quality Wind - Quality Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	38
	62247A	W3160	Quality Wind - Quality Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	8
	62247A	W3160	Quality Wind - Quality Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/09/1	6/30/2014	Aug-16	PASS	1
	62247A	W3160	Quality Wind - Quality Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	12
	62247A	W3160	Quality Wind - Quality Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	38
	62247A	W3160	Quality Wind - Quality Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	30
	62247A	W3160	Quality Wind - Quality Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	38
	62247A	W3160	Quality Wind - Quality Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	38
	62247A	W3160	Quality Wind - Quality Wind	PCC 1	2013	Short-term	Eligible Short-term	2013/10/1	6/30/2014	Sep-16	PASS	38
	61580A	W1260	Spicer_1 Units - Spicer Meadow Project	PCC 1	2013	Short-term	Eligible Short-term	2013/12/1	6/30/2014	Nov-16	PASS	440
	61750A	W1011	Stony Gorge Hydro Aggregate - Stony Gorge	PCC 1	2013	Short-term	Eligible Short-term	2013/12/1	6/30/2014	Nov-16	PASS	2
	60750A	W806	Wheat Field - Wheat Field	PCC 1	2013	Short-term	Eligible Short-term	2013/11/1	6/30/2014	Oct-16	PASS	12
	60750A	W806	Wheat Field - Wheat Field	PCC 1	2013	Short-term	Eligible Short-term	2013/11/1	6/30/2014	Oct-16	PASS	36
	60750A	W806	Wheat Field - Wheat Field	PCC 1	2013	Short-term	Eligible Short-term	2013/11/1	6/30/2014	Oct-16	PASS	97
	61204A	W2556	Biomass One, LP - Biomass One LP	PCC 3	2012	Short-term	Eligible Short-term	Mar-12	6/30/2014	Feb-15	PASS	8,189
	61204A	W2556	Biomass One, LP - Biomass One LP	PCC 3	2012	Short-term	Eligible Short-term	Jan-12	6/30/2014	Dec-14	PASS	9,734
	61204A	W2556	Biomass One, LP - Biomass One LP 2	PCC 3	2012	Short-term	Eligible Short-term	Apr-12	6/30/2014	Mar-15	PASS	5,534
	61204A	W2546	Biomass One, LP - Biomass One LP 2	PCC 3	2012	Short-term	Eligible Short-term	Sep-12	6/30/2014	Aug-15	PASS	7,300
	61204A	W2546	Biomass One, LP - Biomass One LP 2	PCC 3	2012	Short-term	Eligible Short-term	Apr-12	6/30/2014	Mar-15	PASS	5,534
	61204A	W2546	Biomass One, LP - Biomass One LP 2	PCC 3	2012	Short-term	Eligible Short-term	Mar-12	6/30/2014	Feb-15	PASS	8,189
	61204A	W2546	Biomass One, LP - Biomass One LP 2	PCC 3	2012	Short-term	Eligible Short-term	Feb-12	6/30/2014	Jan-15	PASS	5,520

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.

	Input Required
	Information is Hard Coded (No Input Required)

[illegible]

Annual RPS Compliance Report: (2015) 36 Month Retirement

Data Reported by:
Commerce Energy, Inc.
September 1, 2016

	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.

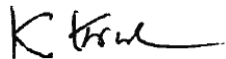
CPUC ID	RPS ID	WREGIS_ID	Facility Name	Expected PCC Classification	Contract Year	Contract Length	Short Term Contract Eligibility	Vintage Month/Year	Retirement Date (MM/DD/YYYY)	Last Month to Retire REC (Month/Year)	Do RECs "Pass" or "Fail" Requirements of 36 Month Rule:	MWh REC Quantity Retired
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	01/2015	8/1/2015	Dec-2017	PASS	200
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	01/2015	8/1/2015	Dec-2017	PASS	368
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	01/2015	8/1/2015	Dec-2017	PASS	800
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	01/2015	8/1/2015	Dec-2017	PASS	352
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	01/2015	8/1/2015	Dec-2017	PASS	560
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	01/2015	8/1/2015	Dec-2017	PASS	800
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	01/2015	8/1/2015	Dec-2017	PASS	630
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	01/2015	8/1/2015	Dec-2017	PASS	800
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	01/2015	8/1/2015	Dec-2017	PASS	490
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	03/2015	5/12/2016	Feb-2018	PASS	297
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	02/2015	5/12/2016	Jan-2018	PASS	420
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	02/2015	5/12/2016	Jan-2018	PASS	560
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	02/2015	5/12/2016	Jan-2018	PASS	87
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	02/2015	5/12/2016	Jan-2018	PASS	20
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	02/2015	5/12/2016	Jan-2018	PASS	6
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	02/2015	5/12/2016	Jan-2018	PASS	3
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	02/2015	5/12/2016	Jan-2018	PASS	2
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	02/2015	5/12/2016	Jan-2018	PASS	2
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	02/2015	5/12/2016	Jan-2018	PASS	448
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	02/2015	5/12/2016	Jan-2018	PASS	1,281
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	02/2015	5/12/2016	Jan-2018	PASS	389
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	02/2015	5/12/2016	Jan-2018	PASS	254
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	02/2015	5/12/2016	Jan-2018	PASS	91
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	02/2015	5/12/2016	Jan-2018	PASS	103
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	Feb-15	5/12/2016	Jan-2018	PASS	39
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	Feb-15	5/12/2016	Jan-2018	PASS	548
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	Feb-15	5/12/2016	Jan-2018	PASS	426
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	Feb-15	5/12/2016	Jan-2018	PASS	2
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	Feb-15	5/12/2016	Jan-2018	PASS	2
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	Feb-15	5/12/2016	Jan-2018	PASS	18
	61360A	W1992	Dokie Wind - Dokie Wind	PCC2	2015	1 year	Ineligible Short-term	Feb-15	5/12/2016	Jan-2018	PASS	2
	61375A	W225	Falls Creek Hydro - Falls Creek H	PCC3	2015	Long-term	Long-term - N/A	Apr-15	6/24/2016	Mar-2018	PASS	1,434
	61375A	W225	Falls Creek Hydro - Falls Creek H	PCC3	2015	Long-term	Long-term - N/A	May-15	6/24/2016	Apr-2018	PASS	566
	61204A	W2546	Biomass One, LP - Biomass One	PCC3	2015	1 year	Ineligible Short-term	Oct-15	6/24/2016	Sep-2018	PASS	9,347
	61204A	W2556	Biomass One, LP - Biomass One	PCC3	2015	1 year	Ineligible Short-term	Oct-15	6/24/2016	Sep-2018	PASS	9,347
	61204A	W2546	Biomass One, LP - Biomass One	PCC3	2015	1 year	Ineligible Short-term	Nov-15	6/24/2016	Oct-2018	PASS	7,896
	61204A	W2556	Biomass One, LP - Biomass One	PCC3	2015	1 year	Ineligible Short-term	Sep-15	6/24/2016	Aug-2018	PASS	3,410

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 September 1, 2016 at Houston, Texas.



Krishnan Kasiviswanathan, Senior Vice President, Supply and Strategic Development