

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)

Liberty Power Holdings LLC

33% RPS Compliance Report

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

PUBLIC VERSION

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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.cpub.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.

Liberty Power Holdings LLC 2015 Annual 33% RPS Compliance Report Narrative Reporting Requirements

In accordance with Public Utilities Code Section 399.13(a)(3) and the “Instructions” tab of the 33% RPS Compliance Report template (reporting RPS compliance status for the first compliance period (2011-2013)), Liberty Power Holdings LLC (“Liberty Power”) provides the following narrative response along with its 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 Power 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 Power procured the following RECs from eligible renewable energy resources located outside California and within the WECC.

WREGIS Generating Unit ID #	Facility Name	City	State	RECs
W186	Elkhorn Valley Wind Farm	Union	OR	3,000

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

Response:

In addition to the 3,000 unbundled RECs identified in response to question 2, above, Liberty Power procured 1,000 other unbundled RECs in 2015 from the following facilities.

WREGIS Generating Unit ID #	Facility Name	City	State	RECs
W4225	Oxnard Elem School District - Chavez	Ventura	CA	13

	Elementary School - Oxnard ESD			
W4225	Oxnard Elem School District - Chavez Elementary School - Oxnard ESD	Ventura	CA	20
W4225	Oxnard Elem School District - Chavez Elementary School - Oxnard ESD	Ventura	CA	18
W3945	Cabrillo Unified SD - Half Moon Bay HS - CUSD - HMBHS JB-9401736-00	San Mateo	CA	49
W3945	Cabrillo Unified SD - Half Moon Bay HS - CUSD - HMBHS JB-9401736-00	San Mateo	CA	31
W3945	Cabrillo Unified SD - Half Moon Bay HS - CUSD - HMBHS JB-9401736-00	San Mateo	CA	31
W4222	East Bay MUD-Water Treatment Plant - East Bay MUD-Camanche South Shore	Calaveras	CA	18
W4222	East Bay MUD-Water Treatment Plant - East Bay MUD-Camanche South Shore	Calaveras	CA	16
W4222	East Bay MUD-Water Treatment Plant - East Bay MUD-Camanche South Shore	Calaveras	CA	31
W3354	LSD - Discovery JB-935317-00 - LSD - Discovery JB-935317-00	Los Angeles	CA	18
W3354	LSD - Discovery JB-935317-00 - LSD - Discovery JB-935317-00	Los Angeles	CA	23
W3354	LSD - Discovery JB-935317-00 - LSD - Discovery JB-935317-00	Los Angeles	CA	33
W3370	LSD - Piute 2/2 JB-935146-00 - LSD - Piute 2/2 JB-935146-00	Los Angeles	CA	43
W3370	LSD - Piute 2/2 JB-935146-00 - LSD - Piute 2/2 JB-935146-00	Los Angeles	CA	30
W3370	LSD - Piute 2/2 JB-935146-00 - LSD - Piute 2/2 JB-935146-00	Los Angeles	CA	25
W3967	San Jose - Roosevelt Community Cent - JB-951438-00 - San Jose - Roosevelt Community Cent - JB-951438-00	Santa Clara	CA	4
W3967	San Jose - Roosevelt Community Cent - JB-951438-00 - San Jose - Roosevelt Community Cent - JB-951438-00	Santa Clara	CA	3
W3967	San Jose - Roosevelt Community Cent - JB-951438-00 - San Jose - Roosevelt Community Cent - JB-951438-00	Santa Clara	CA	9
W3972	San Jose Alum Rock Library JB-951431-00 - San Jose Alum Rock Library JB-951431-00	Santa Clara	CA	10
W3972	San Jose Alum Rock Library JB-951431-00 - San Jose Alum Rock Library JB-951431-00	Santa Clara	CA	6
W3972	San Jose Alum Rock Library JB-951431-00 - San Jose Alum Rock Library JB-951431-00	Santa Clara	CA	6
W3970	San Jose Evergreen Library - JB-951428-00 - San Jose Evergreen Library - JB-951428-	Santa Clara	CA	7

	00			
W3970	San Jose Evergreen Library - JB-951428-00 - San Jose Evergreen Library - JB-951428-00	Santa Clara	CA	7
W3970	San Jose Evergreen Library - JB-951428-00 - San Jose Evergreen Library - JB-951428-00	Santa Clara	CA	11
W3969	San Jose Pearl Library - JB-951436-00 - San Jose Pearl Library - JB-951436-00	Santa Clara	CA	6
W3969	San Jose Pearl Library - JB-951436-00 - San Jose Pearl Library - JB-951436-00	Santa Clara	CA	4
W3969	San Jose Pearl Library - JB-951436-00 - San Jose Pearl Library - JB-951436-00	Santa Clara	CA	3
W3968	San Jose Tully Community Library - JB- 951430-00 - San Jose Tully Community Library - JB-951430-00	Santa Clara	CA	10
W3968	San Jose Tully Community Library - JB- 951430-00 - San Jose Tully Community Library - JB-951430-00	Santa Clara	CA	12
W3968	San Jose Tully Community Library - JB- 951430-00 - San Jose Tully Community Library - JB-951430-00	Santa Clara	CA	17
W3971	San Jose Willow Community Center JB- 951442-00 - San Jose Willow Community Center JB-951442-00	Santa Clara	CA	12
W3971	San Jose Willow Community Center JB- 951442-00 - San Jose Willow Community Center JB-951442-00	Santa Clara	CA	7
W3971	San Jose Willow Community Center JB- 951442-00 - San Jose Willow Community Center JB-951442-00	Santa Clara	CA	7
W3975	Santa Cruz - Westlake Elementary JB- 9501929-00 - Santa Cruz - Westlake Elementary JB-9501929-00	Santa Cruz	CA	6
W3975	Santa Cruz - Westlake Elementary JB- 9501929-00 - Santa Cruz - Westlake Elementary JB-9501929-00	Santa Cruz	CA	7
W3975	Santa Cruz - Westlake Elementary JB- 9501929-00 - Santa Cruz - Westlake Elementary JB-9501929-00	Santa Cruz	CA	11
W3315	Sonoma County Family YMCA JB-954059- 00 - Sonoma County Family YMCA JB- 954059-00	Sonoma	CA	17
W3315	Sonoma County Family YMCA JB-954059- 00 - Sonoma County Family YMCA JB- 954059-00	Sonoma	CA	32

W3315	Sonoma County Family YMCA JB-954059-00 - Sonoma County Family YMCA JB-954059-00	Sonoma	CA	19
W3977	Temple Isaiah - JB-945661-00 - Temple Isaiah - JB-945661-00	Contra Costa	CA	10
W3977	Temple Isaiah - JB-945661-00 - Temple Isaiah - JB-945661-00	Contra Costa	CA	10
W3977	Temple Isaiah - JB-945661-00 - Temple Isaiah - JB-945661-00	Contra Costa	CA	15
W3976	Warehouse Paradise USD - JB-959045-00 - Warehouse Paradise USD - JB-959045-00	Butte	CA	9
W3976	Warehouse Paradise USD - JB-959045-00 - Warehouse Paradise USD - JB-959045-00	Butte	CA	5
W3976	Warehouse Paradise USD - JB-959045-00 - Warehouse Paradise USD - JB-959045-00	Butte	CA	6
W4102	Woodland High School - WHS-9562555	Woodland	CA	51
W4102	Woodland High School - WHS-9562555	Woodland	CA	41
W4102	Woodland High School - WHS-9562555	Woodland	CA	77
W3934	Woodland Joint USD (Whitehead Elementary) - WJUSD - JB-9562559-00	Yolo	CA	18
W3934	Woodland Joint USD (Whitehead Elementary) - WJUSD - JB-9562559-00	Yolo	CA	9
W3934	Woodland Joint USD (Whitehead Elementary) - WJUSD - JB-9562559-00	Yolo	CA	12
W3973	Woodland Joint USD - Freeman ES JB-9561358-00 - Woodland Joint USD - Freeman ES JB-9561358-00	Yolo	CA	6
W3973	Woodland Joint USD - Freeman ES JB-9561358-00 - Woodland Joint USD - Freeman ES JB-9561358-00	Yolo	CA	5
W3973	Woodland Joint USD - Freeman ES JB-9561358-00 - Woodland Joint USD - Freeman ES JB-9561358-00	Yolo	CA	9
W3314	Woodland Joint USD - Pioneer HS JB-9561359-00 - Woodland Joint USD - Pioneer HS JB-9561359-00	Yolo	CA	26
W3314	Woodland Joint USD - Pioneer HS JB-9561359-00 - Woodland Joint USD - Pioneer HS JB-9561359-00	Yolo	CA	21
W3314	Woodland Joint USD - Pioneer HS JB-9561359-00 - Woodland Joint USD - Pioneer HS JB-9561359-00	Yolo	CA	24
W3362	Woodland Joint USD - Plainfield JB-9561362-00 - Woodland Joint USD-Plainfield Elementary	Yolo	CA	8
W3362	Woodland Joint USD - Plainfield JB-	Yolo	CA	6

	9561362-00 - Woodland Joint USD- Plainfield Elementary			

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:

Any efforts by the Commission to coordinate with the California Energy Commission and the Western Renewable Energy Generation Information System (“WREGIS”) to facilitate tracking, availability, and verification of data needed to substantiate renewable procurement eligibility as well as the portfolio content category of procurement will help reduce the administrative burden faced by retail sellers to compile such data in RPS compliance reports.

RPS Compliance Report: 2011-2013 Compliance Period Summary

2011-13 Compliance Period
31-Aug-16

RPS Summary Report	2011 MWh	2012 MWh	2013 MWh	CP TOTAL MWh	% of Total Retail Sales
Total Retail Sales	15,726	62,171	62,374	140,271	n/a
Annual RPS Targets and Compliance Period Procurement Requirement	3,145	12,434	12,475	28,054	20.0%
Total RPS Eligible RECs Procured	0	0	20,588	20,588	14.7%
Total RPS Eligible RECs Retired	0	0	20,588	20,588	14.7%

This amount represents total procurement quantity requirement

This amount represents quantity of RECs retired for this compliance period

RPS Procurement Resource Mix

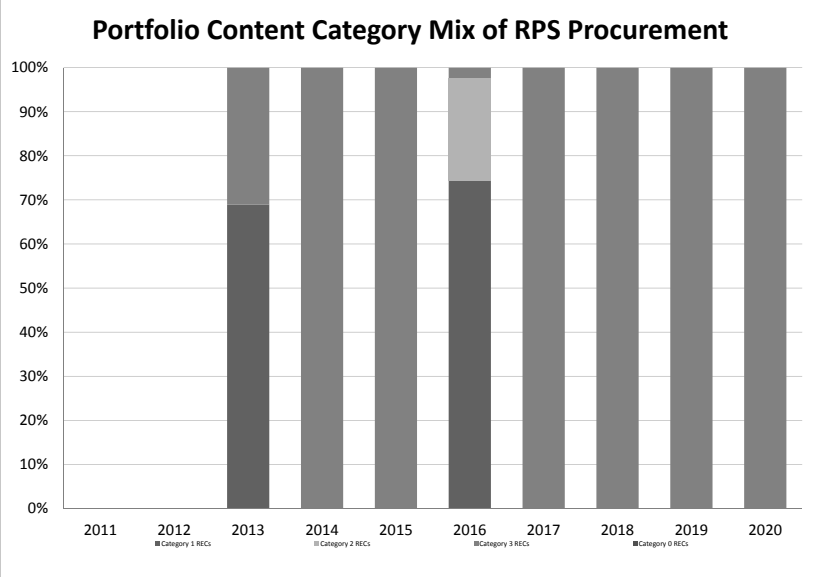
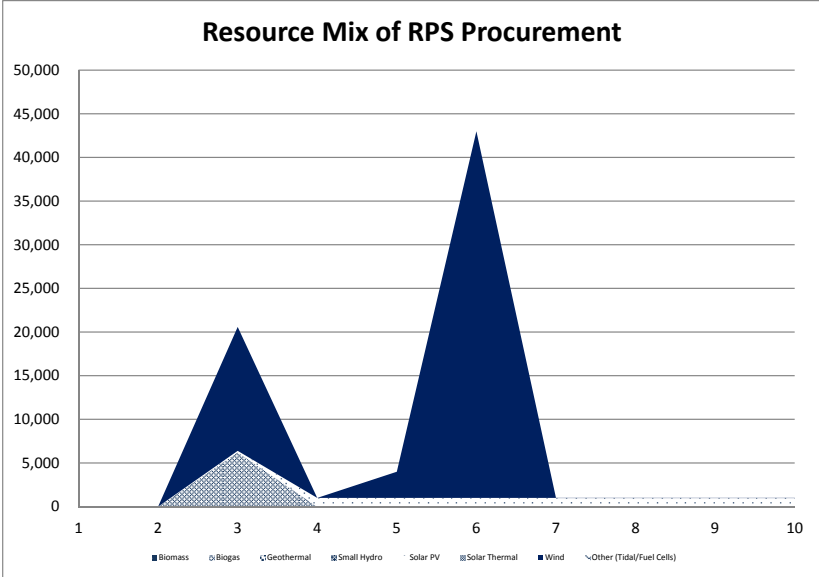
RPS Procurement (2011-13)	2011 MWh	2012 MWh	2013 MWh	CP TOTAL MWh	% of Total RPS Procurement
Biomass	0	0	0	0	0.0%
Biomethane: Digester gas	0	0	0	0	0.0%
Biomethane: Landfill gas	0	0	6,219	6,219	30.2%
Biodiesel	0	0	0	0	0.0%
Landfill Gas	0	0	0	0	0.0%
Muni Solid Waste	0	0	0	0	0.0%
Biopower Subtotal	0	0	6,219	6,219	30.2%
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	169	169	0.8%
Solar Thermal	0	0	0	0	0.0%
Wind	0	0	14,200	14,200	69.0%
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	20,588	20,588	

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	14,200	14,200	69.0%
RECs Procured from PCC 2 Eligible Resources	0	0	0	0	0.0%
RECs Procured from PCC 3 Eligible Resources	0	0	6,388	6,388	31.0%
Total	0	0	20,588	20,588	

[illegible]

	A	B	C	D	E	F	G	H	I	J	K	L	M
39		Portfolio Content Category Mix											
40													
41			2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	
43		Category 0 RECs	0	0	0	0	0	0	0	0	0	0	
44		Category 1 RECs	0	0	14,200	0	0	32,000	0	0	0	0	
45		Category 2 RECs	0	0	0	0	0	10,000	0	0	0	0	
46		Category 3 RECs	0	0	6,388	1,000	4,000	1,000	1,000	1,000	1,000	1,000	
47													
48													
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A	B	C	D	E	F	G	H	I	J	K	L
1											
2	Annual RPS Compliance Report: Compliance Status										
3	Data Reported by:										
4	Liberty Power Holdings LLC										
5	August 31, 2016										
6											
7											
8											
9	Information from the 20% RPS Compliance Program (MWh)										
10	Total Retail Sales in 2010										
11	Net Surplus/(Deficit) from 20% RPS Closing Report										
12											
13											
14											
15											
17	Annual RPS Procurement and Percentages (MWh)										
18	Annual Retail Sales										
19	Annual RPS Procurement										
20	Annual Percentage Targets										
21	Annual RPS Procurement Percentage										
22											
23											
24											
25	Procurement Quantity Requirement (MWh)										
26	Procurement Quantity Requirement (PQR)										
27	PCC 0 RECs (Annual)										
28	PCC 1 RECs (Annual)										
29	PCC 2 RECs (Annual)										
30	PCC 3 RECs (Annual)										
31	Annual Percentage Targets										
32	RECs as Percentage of Retail Sales										
33	Total RECs (Compliance Period)										
34											
36											
37											
38	Portfolio Balance Requirements (MWh)										
39	PCC 1 RECs Retired (Compliance Period)										
40	PCC 2 RECs Retired (Compliance Period)										
41	PCC 3 RECs Retired (Compliance Period)										
42	PCC 1 Balance Requirement										
43	Excess/(Shortfall) Retirements from PCC 1										
44	Calculated PCC 2 Balance Limitation										
45	Ineligible Category 2										
46	PCC 3 Balance Limitation										
47	Ineligible Category 3										
48											

A	B	C	D	E	F	G	H	I	J	K	L
49											
50		Compliance Period 1			Compliance Period 2			Compliance Period 3			
51	Excess Procurement Calculation (MWh)	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
52	PCC 0 RECs applied to PQR		0			N/A				N/A	
53	Long-Term PCC 1 RECs applied to PQR		0			N/A				N/A	
54	Short-Term PCC 1 RECs applied to PQR		14,200			N/A				N/A	
55	Long-Term PCC 2 RECs applied to PQR		0			N/A				N/A	
56	Short-Term PCC 2 RECs applied to PQR		0			N/A				N/A	
57	Long-Term PCC 3 RECs applied to PQR		0			N/A				N/A	
58	Short-Term PCC 3 RECs applied to PQR		6,272			N/A				N/A	
59	Excess RECs Eligible for Banking		0			N/A				N/A	
60	Excess PCC 0 RECs		0			N/A				N/A	
61	Excess PCC 1 RECs		0			N/A				N/A	
62	Excess PCC 2 RECs		0			N/A				N/A	
63	Remaining Excess RECs Eligible for Banking and Requiring a Category Assignment		0			N/A				N/A	
64											
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		8,620			N/A				N/A	
82	Total RECs not in compliance with RPS Procurement Balance Requirement		1,154			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		\$431,014			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		(116)			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		14,200			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		0			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		6,272			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		116			N/A in Compliance Period 2				N/A in Compliance Period 3	
106	Cumulative Closing Report Deficit		0			N/A in Compliance Period 2				N/A in Compliance Period 3	

Annual RPS Compliance Report: Procurement Detail

Data Reported by:
Liberty Power Holdings LLC
August 31, 2016

	Input Required
	Actual Data
	Forecasted Data

[illegible][illegible]

Annual RPS Compliance Report: (2011) 36 Month Retirement

Data Reported by:

Liberty Power Holdings LLC

August 31, 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.

[illegible]

Annual RPS Compliance Report: (2012) 36 Month Retirement

Data Reported by:

Liberty Power Holdings LLC

August 31, 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.

[illegible]

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)

Input Required

Information is Hard Coded (No Input Required)

[illegible]

Annual RPS Compliance Report: (2014) 36 Month Retirement

Data Reported by:
Liberty Power Holdings LLC
August 31, 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.

[illegible]

Annual RPS Compliance Report: (2015) 36 Month Retirement

Data Reported by:

Liberty Power Holdings LLC

August 31, 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.

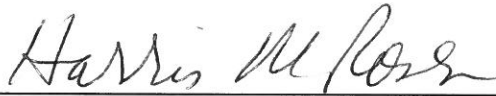
[illegible]

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 33 Percent RPS 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 31st day of August, 2016 at Fort Lauderdale, FL

A handwritten signature in cursive script, reading "Harris M. Rosen", is written over a horizontal line.

Harris Rosen, Vice President, Law and General Counsel