

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



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

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

**2016 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN
OF EDF INDUSTRIAL POWER SERVICES (CA), LLC**

(PUBLIC)

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August 8, 2016

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**2016 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN
OF EDF INDUSTRIAL POWER SERVICES (CA), LLC**

I. INTRODUCTION

In accordance with the May 17, 2016 Assigned Commissioner and Administrative Law Judge’s Ruling Identifying Issues and Schedule of Review for 2016 Renewables Portfolio Standard Procurement Plans (“May 17 Ruling”) and the June 13, 2016 email ruling of Administrative Law Judge (“ALJ”) Mason revising the procedural schedule set forth in the May 17 Ruling, EDF Industrial Power Services (CA), LLC (“EDF”) hereby submits this 2016 Renewables Portfolio Standard Procurement Plan (“RPS Plan”).¹ EDF’s RPS Plan consists of the information described in Sections 6.1-6.5, 6.7, 6.8, and 6-12-6.14 of the Ruling.² In accordance with the May 21, 2014 ALJ’s Ruling on Residual Net Short, EDF’s RPS Plan also includes a Residual Net Short (“RNS”) report and responses to the questions posed in said ruling.

¹ EDF is registered with the Commission as an electric service provider (“ESP”) authorized to provide direct access (“DA”) service to retail customers in the service territories of Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company.

² Because the Commission does not regulate the rates or terms and conditions of service offered by ESPs (*see* Pub. Util. Code § 394(f)) and its oversight of the participation of ESPs in the RPS program is largely limited to compliance and enforcement matters (*see, generally*, D.05-11-025), much of the RPS procurement planning information requested in the Ruling is either inapplicable or ungermane to ESPs.

II. RPS PROCUREMENT PLAN

6.1. Assessment of RPS Portfolio Supplies and Demand – § 399.13(a)(5)(A)

EDF is well on its way to meeting its RPS obligations for the 2014-2016 compliance period using a mix of bundled and REC-only transactions. EDF plans to meet its RPS obligations for future compliance periods through a similar mix of bundled and REC-only transactions; the exact portfolio mixes for the current and future compliance periods will reflect the applicable portfolio category requirements and limitations, and will largely be dependent on the pricing of the various RPS-eligible products available. EDF does not have any need for RPS resources with specific deliverability characteristics. Given the relatively small size of the load it serves compared to overall system load, EDF does not have any plans to diversify its overall RPS portfolio in response to grid integration issues or the potential for overgeneration. None of the other information specified in Section 6.1 of the ruling is applicable or germane to EDF's RPS procurement planning.³ Lastly, EDF anticipates that its RPS procurement planning will remain largely the same under the 50% RPS.

6.2 Project Development Status Update – § 399.13(a)(5)(D)

EDF has no information to report in this section, as EDF has not entered into any contracts with facilities that are not yet in commercial operation.

6.3. Potential Compliance Delays – § 399.13(a)(5)(B)

EDF does not anticipate any compliance delays for the 2014-2016 compliance period. If any compliance impediments become evident in the future, EDF will identify and address them in future RPS Procurement Plans.

³ EDF does not expect to make any direct capital investments in new renewable generation capacity during the 10-year planning period specified in Section 6.1 of the Ruling; however, EDF will comply with the minimum long-term RPS contracting requirement, which will indirectly support the development of new capacity.

6.4. Risk Assessment – § 399.13(a)(5)(F)

EDF has no information to report in this section, as EDF has not entered into any contracts with facilities that are not yet in commercial operation.

6.5. Quantitative Information – §§ 399.13(a)(5)(A), (B), (D) and (F)

Please see the RNS report attached hereto as Appendix A.

6.7. Bid Solicitation Protocol, Including Least-Cost Best-Fit Methodologies – § 399.13(a)(5)(C) and D.04-07-029

The information identified in Section 6.7 of the Ruling is neither applicable nor germane to EDF's RPS procurement and the Commission's limited oversight thereof.

6.8. Consideration of Price Adjustment Mechanisms – § 399.13(a)(5)(E)

The information identified in Section 6.8 of the Ruling is neither applicable nor germane to EDF's RPS procurement and the Commission's limited oversight thereof.

6.12. Important Changes to Plans Noted

EDF has not made any important changes in this RPS plan as compared to the company's 2015 RPS Plan.

6.13. Redlined Copy of Plans Required

A redlined copy of this RPS Plan showing the changes from EDF's 2015 RPS Plan is attached hereto as Appendix B.

6.14. Safety Considerations

Given that EDF does not own, operate or control any RPS-eligible generation facilities, the company's RPS plan does not give rise to any safety considerations.

III. RESPONSES TO ALJ QUESTIONS

RPS Compliance Risk

1. **How do current and historical performance of online resources in your RPS portfolio impact future projections of RPS deliveries and your subsequent RNS?**

There is no impact, as EDF currently does not have any RPS contracts with forward delivery obligations that are dependent on the performance of a specific RPS-eligible generator.

2. **Do you anticipate any future changes to the current bundled retail sales forecast? If so, describe how the anticipated changes impact the RNS.**

As a non-utility retail seller, EDF does not forecast “bundled retail sales.”

3. **Do you expect curtailment of RPS projects to impact your projected RPS deliveries and subsequent RNS?**

No, unless the impact is so large as to impair the ability of non-utility retail sellers to meet their RPS obligations.

4. **Are there any significant changes to the success rate of individual RPS projects that impact the RNS?**

EDF has no information on this subject.

5. **As projects in development move towards their COD, are there any changes to the expected RPS deliveries? If so, how do these changes impact the RNS?**

EDF has no information on this subject.

RECs above the Procurement Quantity Requirement

6. **What is the appropriate amount of RECs above the PQR to maintain? Please provide a quantitative justification and elaborate on the need for maintaining banked RECs above the PQR.**

This topic is not applicable to EDF, as the company is not under any requirement to procure RECs in excess of the company’s RPS obligations.

7. **What are your strategies for short-term management (10 years forward) and long-term management (10-20 years forward) of RECs above the PQR? Please discuss any plans to use RECs above the PQR for future RPS compliance and/or to sell RECs above the PQR.**

See response to Question 6.

Voluntary Margin of Over-Procurement

8. **Provide VMOP on both a short-term (10 years forward) and long-term (10-20 years forward) basis. This should include a discussion of all risk factors and a quantitative justification for the amount of VMOP.**

See response to Question 6.

9. **Please address the cost-effectiveness of different methods for meeting any projected VMOP procurement need, including application of forecast RECs above the PQR.**

See response to Question 6.

Cost-effectiveness

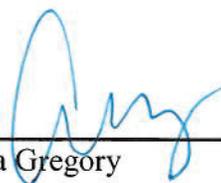
10. **Are there cost-effective opportunities to use banked RECs above the PQR for future RPS compliance in lieu of additional RPS procurement to meet the RNS?**

EDF currently has no opinion on this topic.

11. **How does your current RNS fit within the regulatory limitations for PCCs? Are there opportunities to optimize your portfolio by procuring RECs across different PCCs?**

EDF currently has no opinion on this topic.

Respectfully submitted,



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August 8, 2016

APPENDIX A

RESIDUAL NET SHORT REPORT

Variable	Calculation	Item	Deficit from RPS prior to Reporting Year	2011 Actuals	2012 Actuals	2013 Actuals	2011-2013	2014 Actuals	2015 Actuals	2016 Forecast	2014-2016
		Forecast Year		-	-	-	CP1	-	-	1	CP2
Annual RPS Requirement											
A		Bundled Retail Sales Forecast (LTPP)				118	118	407			
B		RPS Procurement Quantity Requirement (%)				20.0%	20.0%	21.7%	23.3%	25.0%	23.3%
C	A*B	Gross RPS Procurement Quantity Requirement (GWh)				24	24	88			
D		Voluntary Margin of Over-procurement									
E	C+D	Net RPS Procurement Need (GWh)				24	24	88			
RPS-Eligible Procurement											
Fa		Risk-Adjusted RECs from Online Generation				24.52	24.52	24.14	146.54	251.49	422.17
Faa		Forecast Failure Rate for Online Generation (%)					-				-
Fb		Risk-Adjusted RECs from RPS Facilities in Development					-				-
Fbb		Forecast Failure Rate for RPS Facilities in Development (%)					-				-
Fc		Pre-Approved Generic RECs					-				-
Fd		Executed REC Sales					-				-
F	Fa + Fb + Fc - Fd	Total RPS Eligible Procurement (GWh)				24.52	24.52	24.14	146.54	251.49	422.17
F0		Category 0 RECs									
F1		Category 1 RECs				12.67	12.67	-	114.14	160.00	274.14
F2		Category 2 RECs				5.92	5.92	24.11	32.40	30.00	86.51
F3		Category 3 RECs				5.93	5.93	0.03	-	61.49	61.52
Gross RPS Position (Physical Net Short)											
Ga	F-E	Annual Gross RPS Position (GWh)				1	1	(64)			
Gb	F/A	Annual Gross RPS Position (%)				21%	21%	6%			
Application of Bank											
Ha	H - Hc (from previous year)	Existing Banked RECs above the PQR				-	-	-	-	-	-
Hb		RECs above the PQR added to Bank									
Hc		Non-bankable RECs above the PQR									
H	Ha+Hb	Gross Balance of RECs above the PQR				-	-	-	-	-	-
Ia		Planned Application of RECs above the PQR towards RPS Compliance									
Ib		Planned Sales of RECs above the PQR									
J	H-Ia-Ib	Net Balance of RECs above the PQR				-	-	-	-	-	-
J0		Category 0 RECs									
J1		Category 1 RECs									
J2		Category 2 RECs									
Expiring Contracts											
K		RECs from Expiring RPS Contracts				24.52	24.52	24.14	146.54	251.49	422.17
Net RPS Position (Optimized Net Short)											
La	Ga + Ia - Ib - Hc	Annual Net RPS Position after Bank Optimization (GWh)				1	1	(64)			
Lb	(F + Ia - Ib - Hc)/A	Annual Net RPS Position after Bank Optimization (%)				21%	21%	6%			

Facility Name	Technology	Contract Expiration Date	Expected Annual		Location	PCC Classification
			MW	Generation (GWh)		
Rising Tree Wind Farm LLC - Rising Tree Wind Farm LLC	Wind	12/31/2015	34.305	California	PCC 1	
Rising Tree Wind Farm LLC - Rising Tree Wind Farm LLC	Wind	12/31/2015	43.362	California	PCC 1	
Unspecified	Unspecified	12/31/2015	26.375	Unspecified	PCC 1	
Unspecified	Unspecified	12/31/2015	10.100	Unspecified	PCC 1	
Unspecified	Unspecified	12/31/2016	20.000	Unspecified	PCC 1	
Unspecified	Unspecified	12/31/2016	40.000	Unspecified	PCC 1	
Unspecified	Unspecified	12/31/2016	20.000	Unspecified	PCC 1	
Unspecified	Unspecified	12/31/2016	55.000	Unspecified	PCC 1	
Unspecified	Unspecified	12/31/2016	25.000	Unspecified	PCC 1	
Leaning Juniper II - Leaning Juniper II	Wind	12/31/2014	12.625	Oregon	PCC 2	
Neal Hot Springs Unit #1 - Neal Hot Springs Geothermal	Geothermal	12/31/2014	3.200	Oregon	PCC 2	
Seneca Sustainable Energy - Seneca Sustainable Energy	Biomass	12/31/2014	8.000	Oregon	PCC 2	
Elkhorn Valley Wind Farm - Elkhorn Valley Wind Farm	Wind	12/31/2015	15.000	Oregon	PCC 2	
Juniper Canyon - Juniper Canyon	Wind	12/31/2015	14.300	Oregon	PCC 2	
Juniper Canyon - Juniper Canyon	Wind	12/31/2015	3.100	Oregon	PCC 2	
Unspecified	Unspecified	12/31/2016	30.000	Unspecified	PCC 2	
Unspecified	Unspecified	12/31/2014	38.102	Unspecified	PCC 3	
Top of the World - Top of the World	Wind	12/31/2015	10.000	Wyoming	PCC 3	
Unspecified	Unspecified	12/31/2015	2.329	Unspecified	PCC 3	
Unspecified	Unspecified	12/31/2016	11.000	Unspecified	PCC 3	
Unspecified	Unspecified	12/31/2023	0.300	Unspecified	PCC 3	

APPENDIX B

REDLINE OF 2016 RPS PLAN

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**2015-2016 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN OF
EDF INDUSTRIAL POWER SERVICES (CA), LLC**

I. INTRODUCTION

In accordance with the ~~May 28, 2015 Assigned Commissioner's May 17, 2016 Assigned Commissioner and Administrative Law Judge's~~ Ruling Identifying Issues and Schedule of Review for ~~2015-2016~~ Renewables Portfolio Standard Plans ("~~ACR~~ May 17 Ruling") and the ~~June 30, 2015 June 13, 2016~~ email ruling of Administrative Law Judge ("ALJ") Mason ~~extending the due date for the submission of such plans revising the procedural schedule set forth in the May 17 Ruling,~~ EDF Industrial Power Services (CA), LLC ("EDF") hereby submits this ~~2015~~2016 Renewables Portfolio Standard Procurement Plan ("RPS Plan").¹ ~~As required by the ACR,~~ EDF's RPS Plan consists of the information described in Sections ~~6.1, 6.2, 6.3, 6.4, 6.6, 6.13 and 6.15 of the ACR~~6.1-6.5, 6.7, 6.8, and 6-12-6.14 of the May 17 Ruling.² In accordance with the May 21, 2014 Administrative law Judge's Ruling on Residual Net Short ("ALJ Ruling"), ~~this EDF's~~ RPS Plan also includes a Residual Net Short ("RNS") ~~report filing in the form of the template attached as~~

¹ EDF is registered with the Commission as an electric service provider ("ESP") authorized to provide direct access ("DA") service to retail customers in the service territories of Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company.

² Because the Commission does not regulate the rates or terms and conditions of service offered by ESPs (*see* Pub. Util. Code § 394(f)) and its oversight of the participation of ESPs in the RPS program is largely limited to compliance and enforcement matters (*see, generally*, D.05-11-025), much of the RPS procurement planning information requested in the Ruling is either inapplicable or ungermane to ESPs.

~~Appendix C to Attachment A of the ALJ Ruling, as well as and~~ responses to the questions posed in ~~Appendix D to Attachment A of~~ said ruling.

II. RPS PROCUREMENT PLAN

6.1. Assessment of RPS Portfolio Supplies and Demand - § 399.13(a)(5)(A)

~~EDF currently serves a relatively small portion of the state's direct access ("DA") load under contracts with annual or month-to-month terms. Absent legislation further increasing the amount of load that is eligible for DA service, EDF does not expect that portion to change significantly during the ten-year planning horizon, much less the twenty-year time frame, covered by this RPS Plan. Tiger expects to meet its RPS obligations for the 2014-2016 compliance period though EDF is well on its way to meeting its RPS obligations for the 2014-2016 compliance period using a mix of bundled and REC-only transactions. Similarly, EDF plans to meet its RPS obligations for future compliance periods through a similar mix of bundled and REC-only transactions; the exact portfolio mix for the current and future compliance periods will reflect the applicable portfolio content categories, and will largely be dependent on the pricing that is available for the various RPS-eligible products available, as well as the applicable portfolio category requirements. EDF does not have any need for RPS resources with specific deliverability characteristics. Given the relatively small size of the load it serves compared to overall system load, EDF does not have any specific plans to diversify its overall RPS portfolio in response to grid integration issues or the potential for overgeneration. None of the other information specified in Section 6.1 of the ruling is applicable or germane to EDF's RPS procurement planning.³ EDF also does not expect to make any capital investments in new renewable generation capacity during~~

³ EDF does not expect to make any direct capital investments in new renewable generation capacity during the 10-year planning period specified in Section 6.1 of the Ruling; however, EDF will comply with the minimum long-term RPS contracting requirement, which will indirectly support the development of new capacity.

~~the planning period; however, EDF will plan to comply with the minimum long-term contracting quota, which will indirectly support the development of such capacity. Lastly, EDF anticipates that its RPS procurement planning will remain largely the same under the 50% RPS.~~

6.2. Project Development Status Update - § 399.13(a)(5)(D)

EDF has no information to report in this section, as EDF has not entered into any contracts with facilities that are not yet in commercial operation.

6.3. Potential Compliance Delays - § 399.13(a)(5)(B)

~~Given the straightforward nature of EDF's RPS procurement strategy (see Section 1 above), Tiger does not anticipate any compliance delays for the 2014-2016 compliance period. If, however, fundamental barriers to the development of new renewable generation facilities that may be needed to meet the state's overall 33% RPS goal arise during the 2015-2034 forecast period, any corresponding deficiency in the overall amount of RPS products could possibly result in compliance delays for EDF. If and when any such potential compliance delays become evident, EDF will identify those barriers and address in future RPS Procurement Plans the steps it plans to take to account for and minimize their impact on the company's RPS compliance. EDF does not anticipate any compliance delays for the 2014-2016 compliance period. If any compliance impediments become evident in the future, EDF will identify and address them in future RPS Procurement Plans.~~

6.4. Risk Assessment - § 399.13(a)(5)(F)

EDF has no information to report in this section, as EDF has not entered into any contracts with facilities that are not yet in commercial operation.

6.5. Quantitative Information – §§ 399.13(a)(5)(A), (B), (D) and (F)

Please see the RNS report attached hereto as Appendix A.

~~6.6. “Minimum Margin of Procurement” – § 399.13(a)(4)(D)~~

~~EDF has no information to report in this section, as EDF has not entered into any contracts with facilities that are not yet in commercial operation.~~

6.7. Bid Solicitation Protocol, Including Least-Cost Best-Fit Methodologies – § 399.13(a)(5)(C) and D.04-07-029

The information identified in Section 6.7 of the Ruling is neither applicable nor germane to EDF’s RPS procurement and the Commission’s limited oversight thereof.

6.8. Consideration of Price Adjustment Mechanisms – § 399.13(a)(5)(E)

The information identified in Section 6.8 of the Ruling is neither applicable nor germane to EDF’s RPS procurement and the Commission’s limited oversight thereof.

6.12. Important Changes to Plans Noted

EDF has not made any important changes in this RPS plan as compared to the company’s ~~2014-2015~~ RPS Plan.

6.13. Redlined Copy of Plans Required

A redlined copy of this RPS Plan showing the changes from EDF’s 2015 RPS Plan is attached hereto as Appendix B.

6.14. Safety Considerations

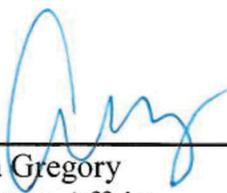
Given that EDF does not own, operate or control any RPS-eligible generation facilities, the company’s RPS plan does not give rise to any safety considerations.

[NO OTHER CHANGES BEYOND THIS POINT]

VERIFICATION

I, Angela Gregory, am authorized to make this verification on the behalf of EDF Industrial Power Services (CA), LLC. I declare under penalty of perjury that the statements in the foregoing *2016 Renewables Portfolio Standard Procurement Plan of EDF Industrial Power Services (CA), LLC* 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.

Executed on August 8, 2016, at Houston, Texas.



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