

**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)

**2018 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN
OF EDF INDUSTRIAL POWER SERVICES (CA), LLC**

(PUBLIC)

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August 20, 2018

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OF THE STATE OF CALIFORNIA**

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**2018 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN
OF EDF INDUSTRIAL POWER SERVICES (CA), LLC**

I. INTRODUCTION

In accordance with the June 21, 2018 *Assigned Commissioner and Administrative Law Judge’s Ruling Identifying Issues and Schedule of Review for 2018 Renewables Portfolio Standard Procurement Plans etc.* (“June 21 Ruling”) and the July 13, 2018 email ruling of Administrative Law Judge (“ALJ”) Mason revising the procedural schedule set forth in the June 21 Ruling, EDF Industrial Power Services (CA), LLC (“EDF”) hereby submits this 2018 Renewables Portfolio Standard Procurement Plan (“RPS Plan”).¹ EDF’s RPS Plan consists of the information described in Sections 5.1-5.5, 5.8, and 5.11-5.13 of the June 21 Ruling.² In

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 June 21 Ruling is either inapplicable or ungermane to ESPs. For the same reasons, EDF respectfully declines to provide RPS procurement cost information of the kind described in Section 5.10 of the June 21 Ruling.

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.

II. RPS PROCUREMENT PLAN

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

EDF has procured sufficient RPS products to meet 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 the 2017-2020 compliance period and 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.

5.2 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.

³ EDF currently has no plans to make direct capital investments in new renewable generation capacity during the 10-year planning period specified in Section 5.1 of the Ruling; however, EDF will comply with the minimum long-term RPS contracting requirements, which will indirectly support the development of new capacity.

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

EDF does not anticipate any compliance delays for the 2017-2020 compliance period. If any compliance impediments become evident in the future, EDF will identify and address them in future RPS Procurement Plans.

5.4. 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.

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

Please see the RNS report attached hereto as Appendix A.

5.8. 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.

5.11. Important Changes to Plans Noted

EDF has not made any important changes in this RPS plan as compared to the company's 2017 RPS Plan.

5.12. Redlined Copy of Plans Required

A redlined copy of this RPS Plan showing the changes from EDF's 2017 RPS Plan is attached hereto as Appendix B.

5.13. 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 solely 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

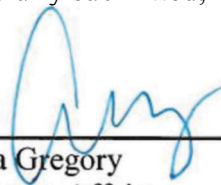
- 10. Are there cost-effective opportunities to use banked RECs above the PQR for future RPS compliance in lieu of additional RPS procurement to meet the RNS?**

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 20, 2018

APPENDIX A

RESIDUAL NET SHORT REPORT

Renewable Net Short Calculations - 2018 RPS Procurement Plans

EDF Industrial Power Services (CA), LLC
20-Aug-18

Input required No input required Head-coded

Variable	Calculation	Item	Reporting Year	2011 Actual	2012 Actual	2013 Actual	2014 Actual	2015 Actual	2016 Actual	2017 Actual	2018 Forecast	2019 Forecast	2020 Forecast	2021 Forecast	2022 Forecast	2023 Forecast	2024 Forecast	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029 Forecast	2030 Forecast		
A	-	Annual RPS Requirement	2017 Actual	118,897	118,897	118,897	497,098	88,156	71,861	17,141	30.1%	30.1%	30.1%	30.1%	30.1%	30.1%	30.1%	30.1%	30.1%	30.1%	30.1%	30.1%	30.1%	30.1%	
B	-	RPS Procurement Quantity Requirement (%)	2017 Actual	20.0%	20.0%	20.0%	21.7%	23.3%	25.1%	23.3%	27.0%	29.0%	31.0%	31.0%	31.0%	31.0%	31.0%	31.0%	31.0%	31.0%	31.0%	31.0%	31.0%	31.0%	
C	-	Gross RPS Procurement Quantity Requirement (GWh)	2017 Actual	23,661	23,661	23,661	107,891	20,566	18,043	3,984	9,060	10,227	11,414	11,414	11,414	11,414	11,414	11,414	11,414	11,414	11,414	11,414	11,414	11,414	
D	-	Voluntary Margin of Over Procurement	2017 Actual	-	-	-	88,321	135,866	198,483	348,951	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
E	-	Net RPS Procurement Need (GWh)	2017 Actual	23,661	23,661	23,661	88,321	135,866	198,483	348,951	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Fa	-	RPS-Eligible RPS from Nuclear Generation	2017 Actual	24,802	24,802	24,802	72,957	144,809	204,862	421,888	258,900	175,860	60,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	
Fb	-	RPS-Eligible RPS from Gas Generation	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fc	-	RPS-Eligible RPS from RPS Facilities in Development	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fd	-	Forecasted Future RPS for RPS Facilities in Development (%)	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fe	-	Pre-Approved Generic RPS	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ff	-	Forecasted Generic RPS	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fg	-	Total RPS-Eligible Procurement (GWh)	2017 Actual	24,802	24,802	24,802	72,957	144,809	204,862	421,888	258,900	175,860	60,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	
Fh	-	Category 0 RPS	2017 Actual	12,672	12,672	12,672	37,821	74,642	107,463	214,926	129,000	86,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	
Fi	-	Category 1 RPS	2017 Actual	6,300	6,300	6,300	19,000	37,800	56,700	113,400	70,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	
Fj	-	Category 2 RPS	2017 Actual	5,930	5,930	5,930	17,136	34,272	51,408	102,816	69,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	
Fk	-	Category 3 RPS	2017 Actual	1,100	1,100	1,100	3,130	6,260	9,390	18,780	12,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	
Ga	-	Gross RPS Position (Physical Net Sheet)	2017 Actual	1,141	1,141	1,141	3,397	6,794	10,191	20,382	17,546	60,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	
Gb	-	Annual Gross RPS Position (GWh)	2017 Actual	0.0%	0.0%	0.0%	17.9%	35.8%	53.7%	107.4%	75.4%	25.1%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	
Gc	-	Annual Net RPS Position (GWh)	2017 Actual	0.0%	0.0%	0.0%	17.9%	35.8%	53.7%	107.4%	75.4%	25.1%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	
Ha	-	Remaining Banked RPS above the PQR	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Hb	-	Remaining Banked RPS below the PQR	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Hc	-	Net Bankable RPS above the PQR	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Hd	-	Net Bankable RPS below the PQR	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
He	-	Gross Balance of RPS above the PQR	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Hf	-	Planned Application of RPS above the PQR towards RPS Compliance	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Hg	-	Planned Scales of RPS above the PQR	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ha	-	Net Balance of RPS above the PQR	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Hb	-	Category 0 RPS	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Hc	-	Category 1 RPS	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Hd	-	Category 2 RPS	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ja	-	Expiring Contracts	2017 Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
K	-	RPS from Expiring RPS Contracts	2017 Actual	24,802	24,802	24,802	72,957	144,809	204,862	421,888	258,900	175,860	60,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	
La	-	Net RPS Position (Optimized Net Sheet)	2017 Actual	1,141	1,141	1,141	3,397	6,794	10,191	20,382	17,546	60,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	50,060	
Lb	-	Annual Net RPS Position after Bank Optimization (GWh)	2017 Actual	0.0%	0.0%	0.0%	17.9%	35.8%	53.7%	107.4%	75.4%	25.1%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	
Lc	-	Annual Net RPS Position after Bank Optimization (%)	2017 Actual	0.0%	0.0%	0.0%	17.9%	35.8%	53.7%	107.4%	75.4%	25.1%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	16.7%	

Note: Values are in GWh unless otherwise noted.

APPENDIX B

REDLINE OF 2017 RPS PLAN

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

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)

**201~~87~~ RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN
OF EDF INDUSTRIAL POWER SERVICES (CA), LLC**

I. INTRODUCTION

In accordance with the June 21, 2018~~May 26, 2017~~ *Assigned Commissioner and Administrative Law Judge’s Ruling Identifying Issues and Schedule of Review for 201~~87~~ Renewables Portfolio Standard Procurement Plans etc.* (“June 21~~May 26~~ Ruling”) and the July 13, 2018~~June 19, 2017~~ email ruling of Administrative Law Judge (“ALJ”) Mason revising the procedural schedule set forth in the June 21~~May 26~~ Ruling, EDF Industrial Power Services (CA), LLC (“EDF”) hereby submits this 201~~87~~ Renewables Portfolio Standard Procurement Plan (“RPS Plan”).¹ EDF’s RPS Plan consists of the information described in Sections 5.1-5.5, 5.8, and 5.11-5.13~~6.1-6.5, 6.7, 6.8, and 6.12-6.14~~ of the June 21~~May 26~~ Ruling.² In accordance with

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 June 21~~May 26~~ Ruling is either inapplicable or ungermane to ESPs. For the same reasons, EDF respectfully declines to provide RPS procurement cost information of the kind described in Section 5.10 of the June 21 Ruling.

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.

II. RPS PROCUREMENT PLAN

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

EDF has procured sufficient RPS products to meet 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 the 2017-2020 compliance period and 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.

65.2 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.

³ EDF currently has no plans to make direct capital investments in new renewable generation capacity during the 10-year planning period specified in Section 65.1 of the Ruling; however, EDF will comply with the minimum long-term RPS contracting requirements, which will indirectly support the development of new capacity.

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

EDF does not anticipate any compliance delays for the 2017-2020 compliance period. If any compliance impediments become evident in the future, EDF will identify and address them in future RPS Procurement Plans.

65.4. 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.

65.5. 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.~~

65.8. 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.

5.116.12. Important Changes to Plans Noted

EDF has not made any important changes in this RPS plan as compared to the company's 20176 RPS Plan.

5.126.13. Redlined Copy of Plans Required

A redlined copy of this RPS Plan showing the changes from EDF's 20176 RPS Plan is attached hereto as Appendix B.

5.136.14. 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 solely dependent on the performance of a specific RPS-eligible generator.

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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.

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- 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.**

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

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Cost-effectiveness

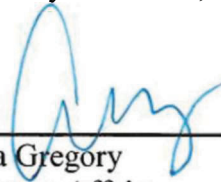
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EDF currently has no opinion on this topic.

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.

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| [August 20, 2018](#) [July 21, 2017](#)

I, Angela Gregory, am authorized to make this verification on behalf of EDF Industrial Power Services (CA), LLC. I declare under penalty of perjury that the statements in the foregoing ***2018 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 20, 2018, at Houston, Texas.



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