

PUBLIC UTILITIES COMMISSION

SAN FRANCISCO, CA 94102-3298



October 12, 2011

**Advice Letters 2442-E and 2442-E-A**

Akbar Jazayeri  
Vice President, Regulatory Operations  
Southern California Edison Company  
P O Box 800  
Rosemead, CA 91770

**Subject: Withdrawal of the above ALs – Submission of Contract for Procurement  
of Renewable Energy from SCE's 2008 Renewables Portfolio Standard  
Solicitation**

Dear Mr. Jazayeri:

Advice Letters 2442-E and 2442-E-A are withdrawn as requested in your letter dated August 29, 2011.

Sincerely,

A handwritten signature in blue ink, appearing to read "Julie A. Fitch".

Julie A. Fitch, Director  
Energy Division

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May 19, 2011

**ADVICE 2442-E-A**  
**(U 338-E)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
ENERGY DIVISION

**SUBJECT:** Supplement to Submission of Contract for Procurement of  
Renewable Energy from SCE's 2008 Renewables Portfolio  
Standard Solicitation

**I. INTRODUCTION AND BACKGROUND**

On February 17, 2010, Southern California Edison Company ("SCE") filed Advice 2442-E, which seeks California Public Utilities Commission ("Commission" or "CPUC") approval of a renewables portfolio standard ("RPS") power purchase agreement (the "WWPP Contract") between SCE and Western Water and Power Production Limited, LLC ("WWPP"). Under the WWPP Contract, SCE is purchasing RPS-eligible energy and related green attributes from the WWPP project, a new 32 MW biomass generating facility to be constructed in Estancia, New Mexico. The project's expected annual net energy production is 252 GWh per year.

On March 11, 2010, the Commission adopted Decision ("D.") 10-03-021, which authorized the procurement and use of tradable renewable energy credits ("TRECs" or "RECs") for compliance with California's RPS program. Among other things, D.10-03-021 reclassified most out-of-state bundled renewable contracts (including executed contracts) as REC-only. Under D.10-03-021, bundled transactions for purposes of compliance with the RPS are defined as: (1) transactions in which energy is acquired from an RPS-eligible generator and the generator has its first point of interconnection with the Western Electricity Coordinating Council ("WECC") interconnected transmission system with a California balancing authority; and (2) transactions in which energy is acquired from an RPS-eligible generator and the energy from the transaction is dynamically transferred to a California balancing authority.<sup>1</sup> REC-only transactions are transactions that: (1) expressly transfer only TRECs and not energy from the seller to the buyer; or (2) transfer both TRECs and energy from the seller to the buyer but do not

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<sup>1</sup> D.10-03-021, as modified by D.11-01-025, Ordering Paragraph 7.

meet the Commission's criteria for a bundled transaction noted above.<sup>2</sup> D.10-03-021 also adopted new standard terms and conditions for both bundled and REC-only RPS contracts, and required that certain information be included in advice letters seeking approval of REC-only contracts.

SCE is purchasing both RPS-eligible energy and green attributes, including TRECs, under the WWPP Contract. However, the WWPP project's first point of interconnection with the WECC interconnected transmission system will not be with a California balancing authority and there is currently no arrangement for the energy delivered under the WWPP Contract to be dynamically transferred to a California balancing authority. Therefore, the WWPP Contract is currently considered a REC-only contract pursuant to D.10-03-021. It is possible that the energy delivered under the WWPP Contract will be dynamically transferred to a California balancing authority. In that case, the WWPP Contract would be a bundled contract pursuant to D.10-03-021, and SCE reserves all rights to argue that the WWPP Contract should be classified as a bundled contract.

On May 6, 2010, the Commission stayed D.10-03-021 pending resolution of two petitions for modification of that decision.<sup>3</sup> The Commission also placed a temporary moratorium on Commission approval of any contracts signed after the issuance of D.10-05-018 that would be defined under D.10-03-021 as REC-only transactions.<sup>4</sup> The WWPP Contract was not subject to the temporary moratorium because it was signed before D.10-05-018 was issued.

On January 13, 2011, the Commission adopted D.11-01-025, which resolved the petitions for modification of D.10-03-021 and lifted the stay of D.10-03-021 and the temporary moratorium on Commission approval of certain REC-only contracts.<sup>5</sup> Although the Commission largely denied the petitions for modification, the Commission modified some portions of D.10-03-021. In particular, D.11-01-025 made revisions to the new standard terms and conditions for bundled and REC-only RPS contracts adopted in D.10-03-021.<sup>6</sup> Additionally, D.11-01-025 authorized the Director of the Energy Division to request supplemental information needed for review of pending advice letters seeking approval of REC-only contracts.<sup>7</sup> The Director of the Energy Division requested such information through a January 24, 2011 letter ("January 24 Energy Division Letter").

The purpose of this advice filing is to supplement Advice 2442-E to comply with D.10-03-021, as modified by D.11-01-025. On February 11, 2011, SCE and WWPP entered

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<sup>2</sup> *Id.*, Ordering Paragraph 6. Deliveries from these REC-only transactions that occurred prior to March 11, 2010 are still considered bundled. *Id.* at 37-38.

<sup>3</sup> D.10-05-018, Ordering Paragraph 1.

<sup>4</sup> *Id.*, Ordering Paragraph 2.

<sup>5</sup> There are several pending applications for rehearing of D.10-03-021 and D.11-01-025, including two filed by SCE. The treatment of the WWPP Contract could change depending on the resolution of those applications for rehearing.

<sup>6</sup> D.10-03-021, as modified by D.11-01-025, Ordering Paragraphs 35-36.

<sup>7</sup> *Id.*, Ordering Paragraph 38.

into Amendment No. 1 to the WWPP Contract (“Amendment No. 1”) to include the new standard terms and conditions required by D.10-03-021, as modified by D.11-01-025. Amendment No. 1 is included as Confidential Attachment 5 to this advice filing. Additionally, this advice filing includes additional information in compliance with D.10-03-021, as modified by D.11-01-025, and the January 24 Energy Division Letter.

The WWPP Contract is consistent with SCE’s RPS Procurement Plan and SCE’s portfolio needs. In particular, the WWPP Contract satisfies SCE’s need for RPS-eligible energy and TRECs, and will contribute toward achievement of SCE’s RPS procurement goals with 252 GWh per year of RPS-eligible energy and green attributes (including TRECs) over a 20-year term. Additionally, by supporting a new biomass generating facility in the WECC region, the WWPP Contract helps to protect public health, improve environmental quality, stimulate economic development throughout the WECC, and create new employment opportunities. Furthermore, the WWPP Contract increases the demand for renewable energy in the market which further encourages the development of renewable energy resources. Accordingly, the WWPP Contract should be expeditiously approved by the Commission.

In accordance with General Order (“GO”) 96-B, the confidentiality of information included in this advice filing is described below. This advice filing contains both confidential and public attachments as listed below.

Confidential Attachment 1:	WWPP Contract Information
Confidential/Public Attachment 2:	SCE’s TREC Position
Confidential Attachment 3:	TREC Prices for Commission-defined REC-only Contracts
Confidential Attachment 4:	WWPP Contract’s TREC Price and Renewable Premium
Confidential Attachment 5:	Amendment No. 1
Attachment 6:	Confidentiality Declaration

## **II. STANDARD TERMS AND CONDITIONS**

In D.10-03-021, as modified by D.11-01-025, the Commission adopted new non-modifiable standard terms and conditions on “Transfer of Renewable Energy Credits” and “Tracking of RECs in WREGIS” to be included in both bundled and REC-only RPS contracts.<sup>8</sup> The Commission also adopted a new version of the non-modifiable standard term and condition on “CPUC Approval” for REC-only contracts and found that the Commission’s non-modifiable standard term and condition on “Applicable Law” also

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<sup>8</sup> *Id.*, Ordering Paragraph 35.

applies to REC-only contracts.<sup>9</sup>

As explained above, the WWPP Contract is currently defined as a REC-only contract under D.10-03-021, as modified by D.11-01-025. Accordingly, the Commission’s non-modifiable standard terms and conditions on “Transfer of Renewable Energy Credits,” “Tracking of RECs in WREGIS,” and the REC-only version of “CPUC Approval” were added to the WWPP Contract through Amendment No. 1. The WWPP Contract already included the Commission’s non-modifiable standard term and condition on “Applicable Law.” The section and page numbers where such terms are located are included in the table below.

Non-Modifiable Term	Section Number	Page Number
STC REC-1 “Transfer of Renewable Energy Credits”	Section 1 of Amendment No. 1 added this term to Section 10.02(d) of the WWPP Contract	Amendment No. 1, page 2
STC REC-2 “Tracking of RECs in WREGIS”	Section 1 of Amendment No. 1 added this term to Section 10.02(e) of the WWPP Contract	Amendment No. 1, page 2
STC REC-3 “CPUC Approval”	Section 2 of Amendment No. 1 added this term to Exhibit A of the WWPP Contract	Amendment No. 1, pages 2-3
STC 17 “Applicable Law”	WWPP Contract, Section 10.07	WWPP Contract, page 61

**III. COMPLIANCE WITH D.10-03-021, AS MODIFIED BY D.11-01-025**

Ordering Paragraph 32 of D.10-03-021, as modified by D.11-01-025, provides that the following information should be included in advice letters seeking approval of REC-only contracts:

- whether the generation facility or facilities producing the energy eligible for the California RPS that is associated with the TRECs to be procured entered commercial operation prior to January 1, 2005, or after January 1, 2005, or was not in commercial operation at the time the contract was signed;
- the sum of all delivered and expected TRECs purchased through contracts executed by the utility to date and how this compares to any applicable annual limit on the use of TRECs for compliance with the California RPS;

<sup>9</sup> *Id.*, Ordering Paragraph 36.

- the sum of all delivered and expected TRECs purchased by that utility through contracts for the procurement of RECs only with facilities that are or were already online as of the execution date of their associated contract for procurement of TRECs, and how this compares to the applicable annual limit on the use of TRECs for compliance with the California RPS;
- the sum of all delivered and expected TRECs purchased by that utility through contracts for the procurement of RECs only with facilities that are not or were not online as of the execution dates of their associated contracts, and how this compares to the applicable annual limit on the use of TRECs for compliance with the California RPS;
- a comparison of the price of the TRECs in the contract that is the subject of the advice letter and the price of TRECs from all contracts for the procurement of RECs only with facilities that were online as of the execution date of their associated contracts; and
- a comparison of the price of the TRECs in the contract that is the subject of the advice letter and the price of TRECs from all contracts for the procurement of RECs only with facilities that were not yet online as of the execution date of their associated contracts.

As noted in Advice 2442-E, the WWPP project is a new biomass generating facility that was not in commercial operation at the time the WWPP Contract was signed, and is still not in commercial operation.

In D.10-03-021, as modified by D.11-01-025, the Commission established a temporary usage limit on the amount of TRECs the investor-owned utilities (“IOUs”) can use for RPS compliance.<sup>10</sup> The IOUs can meet no more than 25% of their annual procurement targets (“APTs”) with TRECs procured from REC-only contracts starting with the 2010 compliance year.<sup>11</sup> The Commission did not prohibit procurement of TRECs in excess of 25% of the APT. Indeed, if an IOU acquires TRECs that exceed 25% of APT in any year, it may carry over the TRECs for future years (subject to any TREC usage limit applicable to the later year).<sup>12</sup> Additionally, REC-only contracts may be used for flexible compliance in the same way as bundled contracts, subject to the TREC usage limit, with the exception of certain limits on earmarking of REC-only contracts.<sup>13</sup>

In compliance with Ordering Paragraph 32 of D.10-03-021, as modified by D.11-01-025, and the January 24 Energy Division Letter, Attachment 2 includes the sum of all delivered and expected TRECs purchased through Commission-defined REC-only

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<sup>10</sup> *Id.*, Ordering Paragraph 17. The temporary usage limit shall terminate December 31, 2013. *Id.*, Ordering Paragraph 19.

<sup>11</sup> *Id.*, Ordering Paragraph 17. The temporary usage limit also applies to electric service providers through a separate decision. D.11-01-026, Ordering Paragraph 3.

<sup>12</sup> D.10-03-021, as modified by D.11-01-025 at 45.

<sup>13</sup> *Id.* at 71-73.

contracts executed by SCE, and a comparison of such TRECs to SCE's TREC usage limits for 2010 through 2013. A comparison is included for all Commission-defined REC-only contracts, all Commission-defined REC-only contracts with facilities that were online when the contract was executed, and all Commission-defined REC-only contracts with facilities that were not online when the contract was executed. SCE has also included comparisons with and without the WWPP Contract, and before and after the use of flexible compliance. SCE's APTs, TREC usage limits, and available TREC balances for 2012 and 2013 are confidential because they are based on SCE's confidential forecast of retail sales for those years. Accordingly, that information is redacted in the public version of Attachment 2. SCE notes that its available balance below the TREC usage limit is very limited in 2012 and 2013 before the use of flexible compliance, and that SCE's available balance of TRECs may be significantly higher in 2012 and 2013 after the use of flexible compliance.

The Commission also adopted a temporary price cap of \$50 per TREC for IOUs in D.10-03-021, as modified by D.11-01-025.<sup>14</sup> If an IOU enters into a contract for both TRECs and energy that is classified as REC-only by the Commission, the price for the TRECs is compared to the price cap.<sup>15</sup> As explained in Advice 2442-E, under the WWPP Contract, SCE is purchasing RPS-eligible energy and related green attributes, including TRECs.

In compliance with Ordering Paragraph 32 of D.10-03-021, as modified by D.11-01-025, and the January 24 Energy Division Letter, confidential information about the WWPP Contract's TREC price is discussed in Confidential Attachments 1 and 4. The WWPP Contract's TREC price is below the temporary price cap of \$50 per TREC. Moreover, as explained in Confidential Attachment 1, the WWPP Contract's pricing compares favorably to the other Commission-defined REC-only contracts executed by SCE. The TREC prices for all of SCE's Commission-defined REC-only contracts (broken down by contracts where the facility was online when the contract was executed and contracts where the facility was not online when the contract was executed) are included in Confidential Attachment 3.

#### **IV. CONFIDENTIALITY**

SCE is requesting confidential treatment of Confidential Attachments 1 and 3 through 5 and the confidential version of Attachment 2 to this advice filing. The information for which SCE is seeking confidential treatment is identified in the Confidentiality Declaration attached as Attachment 6. The confidential version of this advice filing will be made available to appropriate parties (in accordance with SCE's Proposed Protective Order, as discussed below) upon execution of the required non-disclosure agreement. Parties wishing to obtain access to the confidential version of this advice filing may contact Cathy Karlstad in SCE's Law Department at

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<sup>14</sup> *Id.*, Ordering Paragraph 20. The temporary price cap shall terminate December 31, 2013. *Id.*, Ordering Paragraph 21.

<sup>15</sup> *Id.* at 60.

Cathy.Karlstad@SCE.com or (626) 302-1096 to obtain a non-disclosure agreement. In accordance with GO 96-B, a copy of SCE's Proposed Protective Order was attached as Appendix H to Advice 2442-E. It is appropriate to accord confidential treatment to the information for which SCE requests confidential treatment in the first instance in the advice letter process because such information is entitled to confidentiality protection pursuant to D.06-06-066 and is required to be filed by advice letter as part of the process for obtaining Commission approval of RPS power purchase agreements. SCE would object if the information were disclosed in an aggregated format.

The information in this advice filing for which SCE requests confidential treatment, the pages on which the information appears, and the length of time for which the information should remain confidential, are provided in Attachment 6. This information is entitled to confidentiality protection pursuant to D.06-06-066 (as provided in the IOU Matrix). The specific provisions of the IOU Matrix that apply to the confidential information in this advice filing are identified in Attachment 6.

#### **V. REQUEST FOR COMMISSION APPROVAL**

SCE continues to request approval of the WWPP Contract, now as amended. In addition to the other findings requested by SCE in Advice 2442-E, SCE requests a finding that the WWPP Contract's TREC price is below the Commission's temporary price cap of \$50 per TREC.

#### **VI. TIER DESIGNATION**

Pursuant to GO 96-B, Energy Industry Rule 5.3, SCE submits this advice filing with a Tier 3 designation (effective after Commission approval).

#### **VII. EFFECTIVE DATE**

SCE requests that the Commission approve the WWPP Contract as soon as possible, and that this advice filing become effective concurrently with Advice 2442-E.

#### **VIII. PROTESTS**

SCE asks that the Commission maintain the original protest and comment period as designated in Advice 2442-E and not reopen the protest period or allow additional comments. This advice filing does not include any changes to the WWPP Contract other than the new standard terms and conditions required by the Commission.

#### **IX. NOTICE**

In accordance with Section 4 of GO 96-B, SCE is furnishing copies of this advice filing to the interested parties shown on the attached R.11-05-005 and GO 96-B service lists. Address change requests to the GO 96-B service list should be directed to [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com) or at (626) 302-4039. For changes to any other service



list, please contact the Commission's Process Office at (415) 703-2021 or at [ProcessOffice@cpuc.ca.gov](mailto:ProcessOffice@cpuc.ca.gov).

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by filing and keeping the Advice Letter at SCE's corporate headquarters. To view other SCE advice letters filed with the Commission, log on to SCE's web site at <http://www.sce.com/AboutSCE/Regulatory/adviceletters/>.

All questions concerning this advice filing should be directed to Laura Genao at (626) 302-6842 (E-mail: [Laura.Genao@sce.com](mailto:Laura.Genao@sce.com)).

**Southern California Edison Company**

Akbar Jazayeri

AJ:lg:jm  
Enclosures

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

- ELC       GAS  
 PLC       HEAT       WATER

Contact Person: James Yee

Phone #: (626) 302-2509

E-mail: [James.Yee@sce.com](mailto:James.Yee@sce.com)

E-mail Disposition Notice to: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas  
 PLC = Pipeline      HEAT = Heat      WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2442-E-A      Tier Designation: 3

Subject of AL: Supplement to Submission of Contract for Procurement of Renewable Energy from SCE's 2008 Renewables Portfolio Standard Solicitation

Keywords (choose from CPUC listing): Compliance, Contracts, Procurement

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: \_\_\_\_\_

Summarize differences between the AL and the prior withdrawn or rejected AL<sup>1</sup>: \_\_\_\_\_

Confidential treatment requested?  Yes  No

If yes, specification of confidential information: See Attachment 6.

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement.

Name and contact information to request nondisclosure agreement/access to confidential information:

Cathy Karlstad, Law Department, at (626) 302-1096 or [Cathy.Karlstad@sce.com](mailto:Cathy.Karlstad@sce.com).

Resolution Required?  Yes  No

Requested effective date: Upon Commission Approval      No. of tariff sheets: -0-

Estimated system annual revenue effect: (%): \_\_\_\_\_

Estimated system average rate effect (%): \_\_\_\_\_

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: None

Service affected and changes proposed<sup>1</sup>: \_\_\_\_\_

Pending advice letters that revise the same tariff sheets: \_\_\_\_\_

<sup>1</sup> Discuss in AL if more space is needed.

**All correspondence regarding this AL shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Ave.,  
San Francisco, CA 94102  
[inj@cpuc.ca.gov](mailto:inj@cpuc.ca.gov) and [mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)

Akbar Jazayeri  
Vice President of Regulatory Operations  
Southern California Edison Company  
2244 Walnut Grove Avenue  
Rosemead, California 91770  
Facsimile: (626) 302-4829  
E-mail: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)

Bruce Foster  
Senior Vice President, Regulatory Affairs  
c/o Karyn Gansecki  
Southern California Edison Company  
601 Van Ness Avenue, Suite 2040  
San Francisco, California 94102  
Facsimile: (415) 929-5540  
E-mail: [Karyn.Gansecki@sce.com](mailto:Karyn.Gansecki@sce.com)

Marc Ulrich  
Vice President, Renewable and Alternative Power  
c/o Mike Marelli  
Southern California Edison Company  
2244 Walnut Grove Avenue, Quad 4D  
Rosemead, California 91770  
Facsimile: (626) 302-1103  
E-mail: [Mike.Marelli@sce.com](mailto:Mike.Marelli@sce.com)

With a copy to:

Cathy Karlstad  
Attorney  
Southern California Edison Company  
2244 Walnut Grove Avenue, 3<sup>rd</sup> Floor  
Rosemead, California 91770  
Facsimile: (626) 302-1935  
E-mail: [Cathy.Karlstad@sce.com](mailto:Cathy.Karlstad@sce.com)

**Confidential Attachment 1**

**WWPP Contract Information**

**Confidential Protected Materials – Public Disclosure Prohibited**

**Public Attachment 2**

**SCE's TREC Position**

# SCE's TREC Position

Project Name  
Project Facility Status / Commercial Operation

Western Water and Power Production Ltd  
Not yet online

## TREC POSITION BEFORE FLEXIBLE COMPLIANCE

### TREC POSITION WITH PROJECT

All TREC Contracts (GWh)	2010	2011	2012	2013
Annual Procurement Target <sup>1</sup>	15,028	14,865		
25% TREC Limit	3,757	3,716		
TREC Deliveries <sup>2</sup>	1,352	1,255	2,850	3,834
<b>Available Balance</b>	<b>2,405</b>	<b>2,461</b>		

TREC Contracts with Facilities Online When Contract was Executed (GWh)	2010	2011	2012	2013
Annual Procurement Target	15,028	14,865		
25% TREC Limit	3,757	3,716		
TREC Deliveries	1,258	883	1,164	835
<b>Available Balance</b>	<b>2,499</b>	<b>2,833</b>		

TREC Contracts with Facilities Not Online When Contract was Executed (GWh)	2010	2011	2012	2013
Annual Procurement Target	15,028	14,865		
25% TREC Limit	3,757	3,716		
TREC Deliveries	94	372	1,685	2,999
<b>Available Balance</b>	<b>3,663</b>	<b>3,344</b>		

### TREC POSITION WITHOUT PROJECT

All TREC Contracts (GWh)	2010	2011	2012	2013
Annual Procurement Target <sup>1</sup>	15,028	14,865		
25% TREC Limit	3,757	3,716		
TREC Deliveries <sup>2</sup>	1,352	1,255	2,850	3,622
<b>Available Balance</b>	<b>2,405</b>	<b>2,461</b>		

TREC Contracts with Facilities Online When Contract was Executed (GWh)	2010	2011	2012	2013
Annual Procurement Target	15,028	14,865		
25% TREC Limit	3,757	3,716		
TREC Deliveries	1,258	883	1,164	835
<b>Available Balance</b>	<b>2,499</b>	<b>2,833</b>		

TREC Contracts with Facilities Not Online When Contract was Executed (GWh)	2010	2011	2012	2013
Annual Procurement Target	15,028	14,865		
25% TREC Limit	3,757	3,716		
TREC Deliveries	94	372	1,685	2,787
<b>Available Balance</b>	<b>3,663</b>	<b>3,344</b>		

## TREC POSITION AFTER FLEXIBLE COMPLIANCE<sup>3</sup>

### TREC POSITION WITH PROJECT

All TREC Contracts (GWh)	2010	2011	2012	2013
Annual Procurement Target <sup>1</sup>	15,028	14,865		
25% TREC Limit	3,757	3,716		
TREC Deliveries <sup>2</sup>	2,475	2,090	1,164	2,711
<b>Available Balance</b>	<b>1,282</b>	<b>1,627</b>		

TREC Contracts with Facilities Online When Contract was Executed (GWh)	2010	2011	2012	2013
Annual Procurement Target	15,028	14,865		
25% TREC Limit	3,757	3,716		
TREC Deliveries	1,258	883	1,164	835
<b>Available Balance</b>	<b>2,499</b>	<b>2,833</b>		

TREC Contracts with Facilities Not Online When Contract was Executed (GWh)	2010	2011	2012	2013
Annual Procurement Target	15,028	14,865		
25% TREC Limit	3,757	3,716		
TREC Deliveries	1,218	1,206	0	1,876
<b>Available Balance</b>	<b>2,540</b>	<b>2,510</b>		

### TREC POSITION WITHOUT PROJECT

All TREC Contracts (GWh)	2010	2011	2012	2013
Annual Procurement Target <sup>1</sup>	15,028	14,865		
25% TREC Limit	3,757	3,716		
TREC Deliveries <sup>2</sup>	2,475	2,090	1,164	2,499
<b>Available Balance</b>	<b>1,282</b>	<b>1,627</b>		

TREC Contracts with Facilities Online When Contract was Executed (GWh)	2010	2011	2012	2013
Annual Procurement Target	15,028	14,865		
25% TREC Limit	3,757	3,716		
TREC Deliveries	1,258	883	1,164	835
<b>Available Balance</b>	<b>2,499</b>	<b>2,833</b>		

TREC Contracts with Facilities Not Online When Contract was Executed (GWh)	2010	2011	2012	2013
Annual Procurement Target	15,028	14,865		
25% TREC Limit	3,757	3,716		
TREC Deliveries	1,218	1,206	0	1,664
<b>Available Balance</b>	<b>2,540</b>	<b>2,510</b>		

**TREC PROJECT DELIVERIES BEFORE FLEXIBLE COMPLIANCE**

**TREC Projects (GWh) <sup>4</sup>**

	2010	2011	2012	2013
North Hurlburt Wind, LLC	0	0	658	657
South Hurlburt Wind, LLC	0	0	505	719
Horseshoe Bend Wind, LLC	0	0	40	719
Puget Sound Energy, Inc.	892	201	0	0
Goshen Phase II, LLC	94	372	373	372
Echanis, LLC	0	0	109	321
Puget Sound Energy, Inc. II	0	0	640	640
PacifiCorp	245	328	329	0
Puget Sound Energy, Inc. III	121	159	0	0
Western Water and Power Production Ltd	0	0	0	212
TransAlta Energy - Blue Trail	0	195	195	195
<b>Total <sup>2</sup></b>	<b>1,352</b>	<b>1,255</b>	<b>2,850</b>	<b>3,834</b>

**Notes:**

<sup>1</sup> Annual Procurement Target based on SCE's October 2010 bundled sales forecast.

<sup>2</sup> TREC Deliveries excludes deliveries made before 3/11/10 from TREC contracts.

<sup>3</sup> This represents SCE's TREC position under one flexible compliance scenario. SCE reserves the right to reallocate TREC deliveries as permitted under flexible compliance rules.

<sup>4</sup> February 2011 forecast of new generation is based on current expected project online dates, capacities, and energy deliveries at 100% project success rate.

**Confidential Attachment 3**

**TREC Prices for Commission-defined REC-only Contracts**

**Confidential Protected Materials – Public Disclosure Prohibited**



**Confidential Attachment 4**

**WWPP Contract's TREC Price and Renewable Premium**

**Confidential Protected Materials – Public Disclosure Prohibited**

**Confidential Attachment 5**

**Amendment No. 1**

**Confidential Protected Materials – Public Disclosure Prohibited**

**Attachment 6**

**Confidentiality Declaration**

**DECLARATION OF LIZETTE AMARO REGARDING THE CONFIDENTIALITY OF  
CERTAIN DATA**

I, Lizette Amaro, declare and state:

1. I am a Project Manager in the Renewable and Alternative Power Department of Southern California Edison Company ("SCE"). As such, I have reviewed this Advice 2442-E-A. I make this declaration in accordance with California Public Utilities Commission Decisions ("D.") 06-06-066 and D.08-04-023, issued in Rulemaking 05-06-040. I have personal knowledge of the facts and representations herein and, if called upon to testify, could and would do so, except for those facts expressly stated to be based upon information and belief, and as to those matters, I believe them to be true.

2. Listed below are the data in Advice 2442-E-A for which SCE is seeking confidential protection and the categories of the Matrix of Allowed Confidential Treatment Investor Owned Utility ("IOU") Data ("Matrix") appended to D.06-06-066 to which these data correspond.

<b>Data</b>	<b>Pages</b>	<b>Matrix Category</b>	<b>Limitations on Confidentiality Specified in Matrix</b>
Information on WWPP Contract price and other evaluation metrics and evaluation of other projects	Confidential Attachment 1, pages 1-4	VII.F/VII.G RPS Contracts  VII.H Score sheets, analyses, evaluations of proposed RPS projects  VIII.A Bid Information  VIII.B Specific quantitative analysis involved in the scoring and evaluation of participating bids	RPS contracts confidential for three years, or until one year following expiration, whichever comes first.  Score sheets, analyses, evaluations of proposed RPS projects confidential for three years.  For bid information, total number of projects and megawatts bid by resource type public after final contracts submitted to CPUC for approval.  Specific quantitative analysis involved in the scoring and

			evaluation of participating bids confidential for three years after winning bidders selected.
Forecast of bundled customer energy retail sales for 2012 and 2013 and information that easily calculates back to this forecast	Confidential Attachment 1, page 1 Grey highlighted information in Confidential Attachment 2, which is redacted in Public Attachment 2 (Annual Procurement Target, 25% TREC Limit, and Available Balance for 2012 and 2013 under various scenarios)	V.C LSE Total Energy Forecast – Bundled Customer (MWh)	Front three years of forecast data confidential.
TREC prices for Commission-defined REC-only contracts	Confidential Attachment 3	VII.F/VII.G RPS Contracts VII.H Score sheets, analyses, evaluations of proposed RPS projects VIII.A Bid Information VIII.B Specific quantitative analysis involved in the scoring and evaluation of participating bids	RPS contracts confidential for three years, or until one year following expiration, whichever comes first. Score sheets, analyses, evaluations of proposed RPS projects confidential for three years. For bid information, total number of projects and megawatts bid by resource type public after final contracts submitted to CPUC for approval. Specific quantitative analysis involved in the scoring and evaluation of participating bids confidential for three years after winning bidders selected.
WWPP Contract's TREC Price and Renewable Premium	Confidential Attachment 4	VII.F/VII.G RPS Contracts VII.H	RPS contracts confidential for three years, or until one year following expiration,

		Score sheets, analyses, evaluations of proposed RPS projects VIII.A Bid Information VIII.B Specific quantitative analysis involved in the scoring and evaluation of participating bids	whichever comes first. Score sheets, analyses, evaluations of proposed RPS projects confidential for three years. For bid information, total number of projects and megawatts bid by resource type public after final contracts submitted to CPUC for approval. Specific quantitative analysis involved in the scoring and evaluation of participating bids confidential for three years after winning bidders selected.
Amendment No. 1	Confidential Attachment 5	VII.F/VII.G RPS Contracts	RPS contracts confidential for three years, or until one year following expiration, whichever comes first.

3. I am informed and believe and thereon allege that the data in the table in paragraph 2 above cannot be aggregated, redacted, summarized, masked or otherwise protected in a manner that would allow partial disclosure of the data while still protecting confidential information, because Advice 2442-E-A requires that the data be provided in this form.

4. I am informed and believe and thereon allege that the data in the table in paragraph 2 above has never been made publicly available.

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

Executed on May17, 2011 at Rosemead, California.

  
Lizette Amaro