

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

Order Instituting Rulemaking to Develop an
Electricity Integrated Resource Planning
Framework and to Coordinate and Refine Long-
Term Procurement Planning Requirements.

Rulemaking 16-02-007
(Filed February 19, 2016)

**2018 INTEGRATED RESOURCE PLAN OF
EDF INDUSTRIAL POWER SERVICES (CA), INC.**

(PUBLIC)

Gregory Klatt
DOUGLASS & LIDDELL
411 E. Huntington Drive #107-356
Arcadia, CA 91006
Telephone: (626) 802-5733
Email: klatt@energyattorney.com

Attorney for
EDF INDUSTRIAL POWER SERVICES (CA), LLC

August 1, 2018

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OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Develop an
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**2018 INTEGRATED RESOURCE PLAN OF
EDF INDUSTRIAL POWER SERVICES (CA), INC.**

In accordance with Ordering Paragraph 14 of Decision 18-02-018, EDF Industrial Power Services (CA), LLC hereby submits this 2018 Integrated Resource Plan,¹ including the following documents attached hereto and incorporated herein by reference:

- Alternate LSE Plan (Type 1)
- Conforming Portfolio
- Alternative Portfolios
- CEC Form S-1: Capacity Resource Accounting Table
- CEC Form S-2: Energy Balance Accounting Table
- Power Source Disclosure Program 2017 Annual Report
- Officer Verification

Respectfully submitted,



Gregory S.G. Klatt
DOUGLASS & LIDDELL

Attorney for
EDF INDUSTRIAL POWER SERVICES (CA), LLC

August 1, 2018

¹ Spreadsheets and reports containing confidential information are not attached to this public version of EDF's 2018 Integrated Resource Plan.

(PUBLIC)

Alternative LSE Plan

EDF INDUSTRIAL POWER SERVICES (CA), LLC

2018 INTEGRATED RESOURCE PLAN

August 1, 2018

Table of Contents

1. Executive Summary	1
2. Study Design	1
3. Study Results	2
3.1. Preferred and Conforming Portfolios	2
3.2. Disadvantaged Communities Impacts	3
3.3. Cost and Rate Analysis	4
3.4. Local Needs Analysis	4
4. Action Plan	4
5. Lessons Learned	4
6. Confidentiality	4

1. Executive Summary

This 2018 Integrated Resource Plan (2018 IRP) of EDF Industrial Power Services (CA), LLC (“EDF”) consists of the following forms, reports and information:

- CEC Form S-1: Capacity Resource Accounting Table.¹
- CEC Form S-2: Energy Balance Accounting Table.
- EDF’s Power Source Disclosure Program 2017 Annual Report.
- A description of EDF’s treatment of disadvantaged communities.
- A description of how EDF’s planned future procurement is consistent with EDF’s individual Greenhouse Gas Benchmark.
- EDF’s Conformed Portfolio.
- EDF’s Preferred Portfolio, including identification and justification for deviations in assumptions from the Reference System Portfolio.
- A description of how EDF’s Preferred Portfolio is consistent with each relevant statutory and administrative requirement.
- An action plan for implementing EDF’s 2018 IRP.
- A discussion of lessons learned from this IRP and suggestions for improving the IRP process.

2. Study Design

EDF used the following process to develop its 2018 IRP:

1. EDF used its 2019 Resource Adequacy Year-Ahead Load Forecast (RA Load Forecast) as is “assigned load forecast,” which served as the basis for calculating:
 - EDF’s annual energy requirement inputs for the GHG Calculator²;
 - EDF’s annual capacity requirements as reported in CEC Form S-1³;

¹ Load serving entities (LSEs) use Form S-1 and Form S-2 to report electricity supply resource plan information to the California Energy Commission (CEC) as part of the CEC’s data collection for the biennial *Integrated Energy Policy Report*. However, EDF was not required to file an electricity supply resource plan for the 2017 IEPR, given that EDF’s peak load was less than 200 megawatts (MW) in both 2015 and 2016. EDF prepared the S-1 and S-2 forms that are being submitted as part of this 2018 IRP solely for that purpose. Accordingly, the electricity supply resource plan information reported in forms S-1 and S-2 is limited to the current IRP Planning Period (i.e., 2018-2030) and does not include historical information. Moreover, to minimize inconsistencies with the load data used for the GHG Calculator, the load data reported in forms S-1 and S-2 is derived from the same data set that was used for EDF’s 2019 Resource Adequacy Year-Ahead Load Forecast.

² The energy requirements in EDF’s 2019 RA Load Forecast include distribution losses, while the GHG Calculator adds transmission and distribution losses to inputted energy requirements. Therefore, to calculate the energy requirement inputs for the GHG Calculator, EDF deducted distribution losses from the energy requirements reported in its 2019 RA Load Forecast.

³ Whereas the peak loads reported in the RA Load Forecast are *monthly* peak loads by *service territory*, the instructions for CEC Form S-1 call for LSEs to forecast their *annual non-coincident system* peak loads.

- EDF's annual energy requirements as reported in CEC Form S-2⁴;
 - EDF's individual GHG Emissions Benchmark.
2. EDF used its assigned load forecast and the methodology set forth in Decision 18-02-018 to calculate its individual GHG Emissions Benchmark.⁵
 3. EDF produced a Conforming Portfolio based on:
 - EDF's assigned load forecast;
 - EDF's estimated Renewables Portfolio Standard (RPS) procurement obligations for 2018, 2022, 2026 and 2030;
 - EDF's estimated Energy Storage procurement obligations⁶;
 - Inputs and assumptions matching those used in developing the Reference System Portfolio.
 4. EDF used the Clean Net Short Methodology and the GHG Calculator to estimate the GHG emissions produced by its Conforming Portfolio.
 5. EDF produced an Alternative Portfolio using the same inputs and assumptions that it used to produce its Conforming Portfolio, with one exception: EDF assumed the load associated with Home Electric Vehicle Charging was zero in each of the forecast years.
 6. EDF used the Clean Net Short Methodology and the GHG Calculator to estimate the GHG emissions produced by its Alternative Portfolio.
 7. EDF used the resources and methodology referenced in staff's guidance to identify customers in disadvantaged communities.

3. Study Results

3.1. Preferred and Conforming Portfolios

For EDF's Conforming Portfolio, EDF projected its historical RPS procurement across the IRP Planning Horizon. The estimated GHG emissions associated with EDF's Conforming Portfolio total [REDACTED] MMtCO₂/yr., which exceeds EDF's GHG Benchmark by 18.2%. Because of the complexity of the GHG Calculator, it is difficult to determine the causes of that result with any precision. However, EDF believes it is mostly, perhaps entirely, due to the significant (25.7%) increase in EDF's

Thus, while the forecast 2019 annual system peak load reported in Form S-1, which serves as the forecast peak load reported in Form S-1 for each year of the 2018-2030 forecast period, was calculated using the same data set that was used to develop the monthly peak loads for each service territory reported in EDF's 2019 RA Load Forecast, the former is not the simple sum of the latter.

⁴ The annual energy requirements reported in Form S-2 mirror the energy requirement inputs for the GHG Calculator.

⁵ EDF's individual GHG Emissions Benchmark is [REDACTED] MMtCO₂/yr.

⁶ As an electric service provider (ESP), EDF is required to procure energy storage equal to 1% of its 2020 peak load, with the procured energy storage to be in commercial operation by no later than 2024.

forecast 2030 energy requirements that is attributable to inputs and assumptions built into the GHG Calculator.

To test this hypothesis, EDF made one minor adjustment to the GHG calculator, which was to set the assumed “Electric Vehicle Load - Home Charging Only” load input to zero.⁷ This small adjustment and the resulting decrease in EDF’s load forecast reduced EDF’s estimated GHG emissions for 2030 to [REDACTED] MMtCO₂/yr. under this First Alternative Portfolio, thereby reducing the extent to which EDF’s attributed GHG emissions exceed the benchmark to 10.8%.

Importantly, EDF does not serve any residential load, thus making the zeroing out of Home EV Charging Load an eminently reasonable adjustment. Moreover, the total amount of DA load is capped by statute, thus making the attribution of any significant amount of incremental load to EDF questionable. Thus, its First Alternative Portfolio, while based on forecast energy requirements that are still artificially high, more closely approximates EDF’s planned portfolio and estimated GHG emissions than EDF’s Conforming Portfolio. Accordingly, EDF requests that its First Alternative Portfolio be certified as its Preferred Portfolio.⁸

3.2. Disadvantaged Communities Impacts

EDF estimates that 32.7% of its current customers are in disadvantaged communities (DACs).⁹ All such customers are either commercial or industrial customers. That is, EDF does not serve any residential customers in DACs. Therefore, the IRP descriptive requirements for DACs are inapplicable to EDF.

EDF has no DAC-specific activities or programs. However, EDF’s customers help fund utility activities and programs aimed at customers in DACs through public purpose program charges.

EDF has no planned procurement from generation resources located in DACs. Therefore, the IRP requirements related to estimating and minimization of local air pollution in DACs are inapplicable to EDF.

⁷ The inputs for same appear in the GHG Calculator Dashboard at Line 33.

⁸ EDF prepared a Second Alternative Portfolio with an additional adjustment: EDF increased the forecast renewables procurement for 2030 to match the sum of the required PCC1 REC procurement and allowed PCC 2 procurement associated with its unadjusted 2030 energy requirement forecast. This action reduced EDF’s estimated GHG emissions for 2030 to [REDACTED] MMtCO₂/yr., which is less than EDF’s benchmark. Assuming the PCC1 RECs would cost \$7.50 more than PCC2 RECs, EDF estimates the cost of this mitigation measure would be \$ [REDACTED]

⁹ Calculated as a percentage of the total number of meter accounts EDF currently serves.

3.3. Cost and Rate Analysis

Because the direct access market is both competitive and capped, EDF endeavors to secure and retain customers by procuring energy and capacity products, including statutorily mandated products (e.g., RA capacity and RPS products), at the lowest cost possible. EDF plans to continue this practice throughout the IRP forecast period.

3.4. Local Needs Analysis

EDF's local capacity procurement needs will likely vary over the IRP forecast period, as such needs are dependent on the make-up and location of EDF's customers, which will vary over time. Whatever those needs may be, however, EDF will use its best efforts to procure Local RA capacity in the locations and amounts required to meet EDF's assigned Local RA obligations.

4. Action Plan

EDF's 2018 IRP Plan closely reflects EDF's current procurement practices, which are to (a) procure RA and RPS products in the amounts required to satisfy EDF's regulatory obligations and (b) procure its energy requirements primarily from CAISO markets. It does not appear that any changes to those practices will be required to meet EDF's individual GHG Emissions Benchmark.

5. Lessons Learned

EDF's focus in this first IRP cycle has been simply to understand and satisfy the IRP requirements. Energy Division staff has been exceptionally helpful in that regard. Prior to the next IRP cycle, however, EDF recommends that the Energy Division hold a workshop with the aim of identifying IRP data and information requirements that, given the differences between EDFs and other classes of LSEs, can safely be simplified or eliminated for EDFs without detracting from the Commission's ability to meet statutory requirements.

6. Confidentiality

EDF is requesting confidentiality for portions of its 2018 IRP.

CONFORMING PORTFOLIO

FIRST ALTERNATIVE PORTFOLIO

SECOND ALTERNATIVE PORTFOLIO



EDF Industrial Power Services (CA), LLC

Yellow fills indicate confidentiality is being requested pursuant to Appendix A.
 2018 MW numbers are illustrative.

Where cell specifies more than one datum separate data with a semicolon.

Bold font cells sum automatically. Data input by User are in dark green font.

line	Capacity Resource Accounting Table (MW)	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
	PEAK LOAD CALCULATIONS	(↓ Prior Forecasts ↓)		(Forecast Supply ⇒)													
1	Forecast Total Peak-Hour 1-in-2 Demand																
2a	ESP Demand Existing Customer Contracts																
2b	ESP Demand New and Renewed Contracts																
2c	ESP Demand in PG&E service area																
2d	ESP Demand in SCE service area																
2e	ESP Demand in SDG&E service area																
3	Additional Achievable Energy Efficiency (-)																
4	Demand Response / Interruptible Programs (-)																
5	Adjusted Demand: End-Use Customers	0	0	0													
6	Coincidence Adjustment (-)																
7	Coincident Peak-Hour Demand	0	0	0													
8	Required Planning Reserve Margin	0	0	0													
9	Credit for Imports That Carry Reserves (-)																
10	Firm Sales Obligations																
11	Firm LSE Procurement Requirement	0	0	0													

line	Capacity Resource Accounting Table (MW)	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
	CAPACITY SUPPLY RESOURCES																
12a	Total Fossil Fuel Supply	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12b	[state fuel then list each resource e.g. Fossil Unit 1]																
12c	[state fuel; then list each resource, e.g. Natural Gas; Fossil Unit 2]																
12d	[state fuel; then list each resource, e.g. Natural Gas; Fossil Unit N; list planned resources last]																
13a	Total Nuclear Supply	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13b	[Nuclear Unit 1]																
13c	[Nuclear Unit 2]																
14a	Total Hydroelectric Supply	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14b	Total Hydro Supply from Plants larger than 30 MW																
14c	Total Hydro Supply from Plants 30 MW or less																
15a	Total Utility-Controlled Renewable Supply	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15b	[state fuel then list each resource e.g. Renewable Plant 1]																
15c	[state fuel; then list each resource, e.g. Geothermal Renewable Project 2]																
15d	[state fuel; then list each resource, Wind Renewable Project N; list planned resources last]																
17a	Total Qualifying Facility (QF) Contract Supply	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17b	Biofuels																
17c	Geothermal																
17d	Small Hydro																
17e	Solar																
17f	Wind																
17g	Natural Gas																
17h	Other																
18a	Total Renewable Contract Supply	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18b	Renewable DG Supply																
18c	[state fuel then Renewable Contract 1 (Supplier Name)]																
18d	[Small Hydro; then Renewable Contract 2 (Supplier Name)]																
18e	[Solar then Renewable Contract N list planned resources																
19a	Total Other Bilateral Contract Supply	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19b	Non-Renewable DG Supply																
19c	Solar (RA Contract)																
19d	QF Natural Gas (RA Contract)																
19e	Other (Forecast RA Contracts)																
19f	[System Other Bilateral Contract N (Supplier Name)]																
19n	Planned Resources list each on lines inserted below this line.																
20	Short-Term and Spot Market Purchases (and Sales)																

line	CAPACITY BALANCE SUMMARY	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
21	Total: Existing and Planned Supply	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22	Firm LSE Procurement Requirement	0	0	0													
23	Net Surplus (or Need)	0	0	0													
24	Generic Renewable Supply																
25	Generic Non-Renewable Resources																
26	Specified Planning Reserve Margin				15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%

line	Historic LSE Peak Load:	MW Year 2015	MW Year 2016
27	Annual Peak Load / Actual Metered Deliveries		
28	Date of Peak Load for Annual Peak Deliveries	/15	/16
29	Hour Ending (HE) for Annual Peak Deliveries		
30	Interruptible Load called on during that hour (+)		
31	Self-Generation and DG Adjustments		
32	Adjustments for Major Outages		
33	Adjusted Annual Peak Load	0.0	0.0

Lines	Notes
x	
x	



EDF Industrial Power Services (CA), LLC

Yellow fills indicate confidentiality is being requested pursuant to Appendix A.
 2018 GWh numbers are illustrative.

Where cell specifies more than one datum separate data with a semicolon.

Bold font cells sum automatically. Data input by User are in dark green font.

line	Energy Balance Table (GWh)	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
	ENERGY DEMAND CALCULATIONS	(↓ Actual Supply ↓)		(Forecast Supply ⇒)													
1	Forecast Total Energy Demand / Consumption																
2a	ESP Demand Existing Customer Contracts																
2b	ESP Demand New and Renewed Contracts																
2c	ESP Demand in PG&E service area																
2d	ESP Demand in SCE service area																
2e	ESP Demand in SDG&E service area																
3	Additional Achievable Energy Efficiency (-)																
4	Demand Response/ Interruptible Programs (-)																
5	Adjusted Demand: End-Use Customers																
6	Coincidence Adjustment [does not apply to S-2 form]																
7	Coincident Peak-Hour Demand [does not apply to S-2]																
8	Required Planning Reserve [does not apply to S-2]																
9	Credit for Imports That Carry Reserves [does not apply]																
10	Firm Sales Obligations																
11	Firm LSE Procurement Requirement	0	0	0													
	ENERGY SUPPLY RESOURCES																
12a	Total Fossil Fuel Supply	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12b	[state fuel then list each resource e.g. Fossil Unit 1]																
12c	[state fuel then list each resource e.g. Natural Gas Fossil																
12d	[state fuel; then list each resource, e.g. Natural Gas; Fossil Unit N; list planned resources last]																
13a	Total Nuclear Supply	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13b	[Nuclear Unit 1]																
13c	[Nuclear Unit 2]																
14a	Total Hydroelectric Supply	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14b	Total Hydro Supply from Plants larger than 30 MW																
14c	Total Hydro Supply from Plants 30 MW or less																
line	Energy Balance Table (GWh)	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
15a	Total Utility-Controlled Renewable Supply	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15b	[state fuel then list each resource e.g. Renewable Plant 1]																
15c	[state fuel; then list each resource, e.g. Geothermal Renewable Project 2]																
15d	[state fuel; then list each resource, Wind Renewable Project N; list planned resources last]																
17a	Total Qualifying Facility (QF) Contract Supply	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17b	Biofuels																
17c	Geothermal																
17d	Small Hydro																
17e	Solar																
17f	Wind																
17g	Natural Gas																
17h	Other																
18a	Total Renewable Contract Supply	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18b	Renewable DG Supply																
18c	[state fuel; then Renewable Contract 1 (Supplier Name)]																
18d	[Small Hydro; then Renewable Contract 2 (Supplier Name)]																
18e	[Solar then Renewable Contract N list planned resources																
19a	Total Other Bilateral Contract Supply	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19b	Non-Renewable DG Supply																
19c	[state fuel if known; then name Other Bilateral Contract 1 (Supplier Name)]																
19d	[state fuel then list each resource e.g. Natural Gas Other																
19e	[Portfolio Other Bilateral Contract 3 (Supplier Name)]																
19f	[System Other Bilateral Contract N (Supplier Name)]																
19g	Planned Resources list each on lines inserted below this line.																
20	Short Term and Spot Market Purchases (and Sales)																
	ENERGY BALANCE SUMMARY																
21	Total: Existing and Planned Resources	0	0	0													
22	Firm LSE Procurement Requirement	0	0	0													
23	Net Surplus (or Need)																
24	Generic Renewable Supply																
25	Generic Non-Renewable Supply																

line	Notes
x	
x	



**ANNUAL REPORT TO THE CALIFORNIA ENERGY COMMISSION:
 Power Source Disclosure Program
 Schedule 1 and 2, applicable to: Load Serving Entities
 For the Year Ending December 31, 2017**

Load serving entities are required to use the posted template and are not allowed to make edits to this format.
 Please fill out the company name and contact information.

GENERAL INSTRUCTIONS

COMPANY NAME	
	EDF Industrial Power Services (CA), LLC
PRODUCT NAME (If Multiple Products Offered)	
CONTACT INFORMATION	
Name	Byron Pollard
Title	Vice President
Mailing Address	4700 W Sam Houston Parkway North Suite 250
City, State, Zip	Houston, Texas 77041
Phone	(281) 653-1641
E-mail	Byron.Pollard@EDFEnergyServices.com
Website for PCL Posting	http://www.edfenergyservices.com/

Please fill out the schedules that apply to your company's filing requirements. Provide the annual report and attestation together in PDF format and the annual report in an excel file by email to PSDprogram@energy.ca.gov. Remember to fill in the company name above, submit separate reports and attestations for each additional product if multiple electric service products are offered. Report procurements in MWh (not kWh).

NOTE: Information submitted in this report is not automatically held confidential. If your company wishes the information submitted to be considered confidential an authorized representative must submit an application for confidential designation (CEC-13), which can be found on the California Energy Commissions's website at http://www.energy.ca.gov/commission/chief_counsel/documents/CEC13.pdf

If you have questions, contact PSD staff at PSDprogram@energy.ca.gov or (916) 653-6222.



ANNUAL REPORT TO THE CALIFORNIA ENERGY COMMISSION: Power Source Disclosure Program

For the Year Ending December 31, 2017

SCHEDULE 1: POWER PROCUREMENTS AND RETAIL SALES

Applicable to: Load Serving Entities

INSTRUCTIONS: Enter information about power procurements supporting all electricity products for which your company is filing the Annual Report. If you need additional rows, add them from the INSERT menu. Please list all purchases (Specified and Unspecified purchases) as line items under the Facility Name heading. If a procurement was for unbundled RECs include the term "REC Only" in parentheses after the facility name in the Facility Name column, and categorize the power as the fuel type of the generating facility from which the unbundled REC was derived. If procured power was from a transaction that expressly transferred energy only and not the RECs associated with that energy, identify the power as "Unspecified Power" in the Fuel Type column.

ALL PROCUREMENTS (Specified and Unspecified)												
Facility Name	Unit No.	Fuel Type	Location (State or Province)	RPS ID	WREGIS GU ID	EIA ID	FERC QF ID	Gross MWh Procured	MWh Resold or Self-Consumed	Net MWh Procured		
CAISO Markets	N/A	Unspecified	N/A	N/A	N/A							
AV Solar Ranch 1, LLC - Antelope Solar Ranch - Block 7	N/A	Solar	CA	60790	W3474							
AV Solar Ranch 1, LLC - AVSR1 - Antelope Solar Ranch - Block 1 & 2	N/A	Solar	CA	60790	W4141							
AV Solar Ranch 1, LLC - AVSR1 - Antelope Solar Ranch - Block 3	N/A	Solar	CA	60790	W2803							
AV Solar Ranch 1, LLC - AVSR1 - Antelope Solar Ranch - Block 4	N/A	Solar	CA	60790	W3274							
AV Solar Ranch 1, LLC - AVSR1 - Antelope Solar Ranch - Block 5	N/A	Solar	CA	60790	W3275							
AV Solar Ranch 1, LLC - AVSR1 - Antelope Solar Ranch - Block 6	N/A	Solar	CA	60790	W3280							
Geysers Power Plant - Calistoga Power Plant	N/A	Geothermal	CA	60117	W486							
Geysers Power Plant - Calpine Geothermal Unit 18	N/A	Geothermal	CA	60008	W125							
Geysers Power Plant - Calpine Geothermal Unit 20	N/A	Geothermal	CA	60009	W126							
Cassia Gulch Wind Park - Cassia Gulch Wind Park LLC (REC Only)	N/A	Wind	ID	60942	W823							
Cassia Wind Farm - Cassia Wind Farm LLC (REC Only)	N/A	Wind	ID	60943	W822							
Geysers Power Plant - Sonoma/Calpine Geysers	N/A	Geothermal	CA	60010	W127							
Spanish Fork Wind Park - Spanish Fork Wind (REC Only)	N/A	Wind	UT	63434	W1021							

Total Net Purchases

Total Retail Sales



**ANNUAL REPORT TO THE CALIFORNIA ENERGY COMMISSION:
 Power Source Disclosure Program
 For the Year Ending December 31, 2017
 SCHEDULE 2: ANNUAL POWER CONTENT LABEL CALCULATION
 Applicable to: Load Serving Entities**

INSTRUCTIONS: Total specific purchases (by fuel type) and enter these numbers in the first column. Null power purchases should be included with Unspecified Power. REC only purchases should be included as part of the fuel type they represent. Total retail sales information from Schedule 1 will autopopulate on this schedule. Any difference between total net purchases and total retail sales will be applied pro-rata to each non-renewable fuel type. Each fuel type total will then be divided by retail sales to calculate fuel mix percentages.

	Net Purchases (MWh)	Percent of Total Retail Sales (MWh)
Specific Purchases		
Renewable		30%
Biomass & Biowaste		0%
Geothermal		17%
Eligible hydroelectric		0%
Solar		9%
Wind		4%
Coal		0%
Large Hydroelectric		0%
Natural Gas		0%
Nuclear		0%
Other		0%
Total Specific Purchases		30%
Unspecified Power (MWh)		70%
Total		100%
Total Retail Sales (MWh)		

COMMENTS:



**ANNUAL REPORT TO THE CALIFORNIA ENERGY COMMISSION:
Power Source Disclosure Program
For the Year Ending December 31, 2017
ATTESTATION FORM
Applicable to: All participants in the Power Source Disclosure Program**

I, Gregory Klatt, Attorney-at-Law, declare under penalty of perjury, that the statements contained in Schedules 1 and 2 are true and correct and that I, as an authorized agent of EDF Industrial Power Services (CA), LLC, have authority to submit this report on the company's behalf. I further declare that the megawatt-hours claimed as specific purchases as shown in these Schedules were, to the best of my knowledge, sold once and only once to retail consumers.

Signed:

A handwritten signature in black ink, appearing to read "Gregory Klatt", written over a light blue horizontal line.

Dated: June 1, 2018

Executed at: Arcadia, CA

VERIFICATION

I, Gerald Nemec, am an officer of EDF Industrial Power Services (CA), LLC, and I am authorized to make this verification on its behalf. I have read the foregoing 2018 Integrated Resource Plan, including all attachments thereto, and affirm the contents thereof are true of my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 1, 2018, at Houston, Texas.



Gerald Nemec
General Counsel