BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

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COMMENTS OF THE CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION, THE CALIFORNIA MANUFACTURERS & TECHNOLOGY ASSOCIATION AND THE ENERGY USERS FORUM ON THE PROPOSED DECISION ISSUED NOVEMBER 3, 2009

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Introduction

The California Large Energy Consumers Association ("CLECA"), the California Manufacturers & Technology Association ("CMTA") and the Energy Users Forum ("EUF") are pleased to have this opportunity to offer comments on the proposed decision ("PD") of ALJ Wetzell issued November 3, 2009. These organizations were active participants in the workshops held by the Commission in Phase Two of this Rulemaking. CLECA, CMTA and EUF were members of the Bilateral Trading Group ("BTG")[1], whose positions it helped to develop and bring to the attention of the Commission. In particular, CLECA, CMTA and EUF support the BTG's recommendation that the Commission transition the current Resource

[1] The BTG is an *ad hoc* group of consumer organizations and retail and wholesale market participants that includes: the California Large Energy Consumers Association (CLECA), the California Manufacturers & Technology Association (CMTA), the City and County of San Francisco (CCSF), Shell Energy North America, (US) L.P. (formerly known as Coral Power, LLC), the Division of Ratepayer Advocates (DRA), the Energy Users Forum, J. Aron & Company, The Utility Reform Network (TURN), and Direct Energy, LLC (formerly known as Strategic Energy, LLC).

Adequacy ("RA") system of separate procurement of capacity and energy, to an energy-only market, as discussed more fully below.

CLECA, CMTA and EUF also believe that any future changes to the RA program must address the re-opening of the Direct Access market, pursuant to Senate Bill 695, which is now before the Commission for implementation beginning prior to mid-2010. We appreciate the PD's responsiveness to several BTG concerns, including problems of compatibility of proposals for a centralized capacity market ("CCM") run by the California Independent System Operator ("CAISO") with the State's energy policy goals and providing for adequate representation of the interests of end-use customers in the development of future mechanisms for procuring needed new electrical generating capacity. However, CLECA, CMTA and EUF believe that the solution proposed by the PD, i.e. a five-year forward RA procurement requirement for all load-serving entities ("LSEs"), is not a viable solution. In addition, we believe that implementation of any mechanism for the procurement of additional generating capacity must follow from the development of a formal record, not simply sets of comments and reply comments. This proceeding has not provided the type of evidentiary support for some of the apparent conclusions that are reached in the PD. CLECA, CMTA and EUF stand ready to participate in any future proceedings to build such a record.

An Energy-Only Market End Point Should Not Be So Readily Dismissed

The BTG recommended that the current RA requirement be phased out as part of a transition to an energy-only market, in which revenue from energy (and ancillary services) payments support generation, in lieu of separate energy and capacity payments. An energy-only market is most likely to provide wholesale price signals that will support the Commission's dynamic pricing goals. The PD does not provide a reasoned or valid basis for rejecting adoption of a long-run goal of an energy-only market. Its apparent conclusion, on page 14 of the PD, that

an energy-only market is not compliant with Section 380 (c) of the P.U. Code results from an inaccurate reading of the statute. Section 380 (c) provides that:

> (c) Each load-serving entity shall maintain physical generating capacity adequate to meet its load requirements, including, but not limited to, *peak demand* and planning and operating reserves. The generating capacity shall be deliverable to locations and at times as may be necessary to provide reliable electric service. (Emphasis added.)

However, this provision of law simply states that there must be enough generating capacity to serve load. It does not establish that this generation should be paid separately for its capacity and energy attributes. An energy-only market pays for capacity through high energy payments at certain times of the year, payments that exceed the variable costs of the facility and thereby provide revenue for recovery of the fixed costs. The Commission should reconsider whether the continuation of separate capacity and energy markets, as proposed in this PD, will support the Commission's other goals such as dynamic pricing. Indeed, the Commission's current plans for dynamic pricing, in the form of "critical peak pricing", involve the use of an arbitrary on-peak energy charge having nothing to do with actual generation costs incurred by the utilities during peak periods.

The PD Too Readily Dismisses the Consequences for Direct Access

The PD ignores the fact that Direct Access ("DA") will soon be reopened. SB 695 was signed as an urgency matter and new P. U. Code Section 365.1(b) directs that the DA market be reopened six months after the law was chaptered, or April 2010. We believe that the viability of this market is likely to be seriously impeded by a five-year forward, 80% RA capacity purchase requirement, for reasons presented below.

The PD states that "any program redesign should, to the extent possible, support or avoid undermining the broad objective of a competitive retail market." (PD, at p. 61.) We concur. Yet the PD cites no record evidence to support its conclusion that it would not undermine DA.

Its statement: "Because the future form of direct access is being reviewed in other proceedings elsewhere and remains uncertain, it would be premature to conclude that a more rigorous forward RA requirement cannot or should not be adopted because of concerns regarding direct access impacts" (PD, Ibid.), is inconsistent with the certainty of the passage of SB 695 and its requirement that the Commission reopen DA within a short time frame.

The PD also states: "It would be premature to conclude that a more rigorous forward RA requirement cannot or should not be adopted because of concerns regarding direct access impacts. The better policy approach is to ensure that implementation of a more forward RA requirement is appropriately coordinated with the development of retail competition." (PD at p. 76.) We can only assume that this language was written well before SB 695 was signed into law. The PD's proposed RA requirements will go into effect in 2012 and the re-opening of DA will occur in 2010. The Commission no longer has the leisure or the luxury to consider the implications of forward RA requirements on DA at some point in the future.

Because this proceeding included no evidentiary hearings, there is no evidence to support the Commission's expectation that ESPs can financially sustain a five-year forward capacity procurement obligation or that generators will want to engage in five-year forward contracts with them. Indeed, CLECA, CMTA and EUF believe that ESPs are unlikely to be able to undertake such obligations without imposing some additional demands upon their customers, e.g. exit fees if the customers leave before the five years are over. This then would make the customers captive to their ESPs, without a process for evaluating the reasonableness of such fees. It is important to keep in mind that the Commission does not regulate the rates charged by ESPs. This risk would severely undermine DA at the very time it will reopen. The Commission should not adopt a five-year forward bilateral RA obligation without developing a formal record to consider whether such an obligation is feasible for ESPs and/or customers. We suspect that it may kill DA service, either because the ESPs cannot make the commitment or because

customers will be unwilling to incur additional exit fees. That would run directly to the policy of this Commission and, indeed, of the State.

The PD also ignores the provision of the new Section 365.1(c) of the P.U. Code (again from SB 695) that effectively authorizes the continued operation of the Capacity Allocation Mechanism ("CAM"). Under the CAM, the net capacity costs (i.e. costs net of energy and ancillary services value) of third-party generation contracts or utility-owned generation can be allocated to DA and CCA customers as well as bundled customers, along with the associated RA benefits. Thus, the use of the CAM continues to be a viable alternative to either a multi-year forward obligation for LSEs or a CCM. The CAM is not without its flaws, but it may represent a means to preserve the DA option for customers without a CCM, if the Commission supports a multi-year forward obligation. At least the CAM is subject to Commission review, whereas an ESP exit fee would not be.

Will a Five-Year Forward RA Obligation Result in New Generation?

The PD reaches the conclusion that five-year forward bilateral RA procurement will provide a basis for the construction of new generation.

> "Additionally, a multi-year forward commitment should stimulate merchant generator investment, supporting our policy not to rely solely on Commission-directed forward procurement by IOUs to provide the investment needed for new generation." (PD, at p. 34.)

There is no record evidence to support the PD's apparent conclusion. After participating actively in this proceeding, we are not convinced that this is the case. Nor were other parties. SDG&E, while a supporter of a CCM, argued that a ten-year forward commitment would be necessary. If a longer-term commitment is required to secure new generation, it is even less likely that ESPs will be able to undertake it. In such a case, the only viable alternatives are likely to be the CAM or a CCM, neither of which is proposed in the PD.

A CCM Will Not Meet the Commission's Energy Policy Goals (except, perhaps, at the margin)

The PD recognizes that what is needed is not just generic new generation but new generation that meets the state's energy policy goals, including most prominently the addition of renewable generation over a period of years to achieve a goal of generating 33% of total retail kWh from renewable resources, as well as mitigation of greenhouse gas ("GHG") emissions from electric generation. Nor will it necessarily achieve other state policy goals, such as the provision in the SB 32 Scoping Plan for increasing the amount of Combined Heat and Power ("CHP") in the state. However, the PD fails to consider, either for a bilateral or centralized procurement approach, how to acquire the right mix of resources to meet its policy goals. Any policy for acquiring new generation resources must result in the right type of new resources for the system as a whole, in the right places, or customers will pay too much in aggregate. Furthermore, new generation in the right locations must be procured in such a way that it avoids undue market power by providers. We respectfully suggest that the following questions need to be answered before the Commission devises a plan for acquisition and payment for new resources. The PD's proposal to spend up to a million dollars a year on consultants to address these issues in the future leaves this critical matter to future resolution when it needs to be addressed up front.

Indeed, consultant studies will not provide for the development of an evidentiary record either. Furthermore, if the Commission relies on them and another workshop process, the due process rights of parties whose interests are vitally affected by the Commission's decisions will not be met.

- What is needed and where? This requires an assessment of what types of resources will be coming on line per state policy and what else is needed to accommodate them. With the impact of the recession and ever-larger investments in EE and DR, the amount of new generating capacity that is needed over the next decade is not clear. The Commission should perform an assessment of whether existing generation can provide sufficient RA capacity for load for the next five years and in the right locations. If it cannot, the Commission should determine what amount of new resources is needed over and above those likely to be provided through the state's renewable procurement goals and in what

locations.

- Secondly, simply adding generic capacity will not meet California system needs. The PD recognizes that what is needed is generation to support the large increases in renewable generation that are going to be added. This is part of the reason that the PD rejects a CCM, because the latter will procure generic capacity, perhaps by location, but without specificity as to how it can be used to support the state's renewable and other policy goals. However, even in the bilateral model, any non-renewable and non-CHP generation will have to be able to help integrate these new resources, such as by providing ancillary services, ramping, and shaping. The question is how to best acquire the right type of resources.

- It may be that the generation needed to support renewable and GHG goals may best be determined and paid for through CAISO ancillary services requirements, which can then be met through the CAISO markets or self-provision. The RA program was not designed to provide these characteristics. Longer-term RA commitments *per se* are unlikely to provide the types of resources and attributes that are needed. All they provide is a contribution to peak capacity. Furthermore, given the problems with existing generation with once-through cooling ("OTC"), new generation that replaces it will also have to provide inertia and voltage support and be required in specific locations. If there are constraints on permitting new resources that can provide these attributes, even localized RA procurement is not likely to result in acquisition of these specific characteristics, whether it is performed bilaterally or through a CCM.

- The reality is that, once the CAISO determines what is required to integrate larger amounts of intermittent renewables and to replace facilities that may be forced to retire due to OTC, there will be a need to undertake a systematic planning process, like the upcoming LTPP, and determine what mix of attributes new capacity must have. We still have not done this. A requirement for five-year forward procurement of generic capacity that meets RA requirements but is neutral on other attributes is likely to lead to precisely the type of overpayment by consumers that the Commission fears. If this capacity cannot provide the needed attributes, other additional capacity will need to be added to integrate renewables, at an additional cost.

Jurisdictional Issues

The PD makes it clear that one of the PD's primary motivations in opting for a bilateral multi-year RA commitment is to preserve the Commission's jurisdiction, thereby allowing it to accomplish the State's energy policy goals. CLECA, CMTA and EUF concur that the PD's preferred proposal would indeed maintain the Commission's influence over procurement, at least by the investor-owned utilities it regulates. With respect to the impact on the achievement of the State's energy policy objectives, we agree that it is unlikely that the required/desired renewable

energy and CHP will be procured through a CCM. The renewable obligation is in terms of kWh, not MW. The Commission has ruled that the net qualifying capacity ("NQC") counting rules must reflect the availability of the renewable resource on-peak. Combined with the high capacity cost and low variable costs of most renewables, it would be difficult for them to compete in a CCM. Whether a CCM is a good way to procure non-renewable resources, when compared to bilateral contracting, is a separate matter. If there is not much need for non-renewable capacity given the State's 33% RPS policy, an assessment of the cost and efficacy of setting up a CCM, compared to a bilateral mandate, is key. While the PD concludes that the cost of setting up a CCM is not material (PD, at p. 64), such an assessment has not yet been undertaken in this proceeding.

> "In particular, by preserving the Commission's jurisdiction and authority to make changes to the program in response to evolving market conditions, and by encouraging the development of the specialized types of resources that are most appropriate for California's needs, this option may contribute substantially to lowering generation costs that are ultimately paid by ratepayers."

CLECA, CMTA and EUF share the Commission's concern that the creation of a centralized capacity market under the aegis of the CAISO will shift jurisdiction over this market to FERC. There is ample evidence, as cited in the PD, that FERC is not a friendly forum for state regulators or end-use customers. Furthermore, participation in FERC proceedings is very challenging for retail consumer advocates due to the high cost of maintaining a physical presence in Washington, DC for proceedings and settlement conferences.

However, CLECA, CMTA and EUF are not sure that maintaining state jurisdiction will lead to lower generation costs as long as the Commission does not emphasize cost minimization in its decision-making (e.g. with respect to renewable procurement, where such emphasis is notably lacking) and as long as the Commission concludes, as it has done in the PD, that new and existing generation should receive the same payments for capacity.

Conclusion

CLECA, CMTA and EUF appreciate the amount of effort that has gone into the preparation of this PD. However, we respectfully submit that its conclusions are not supported by any real evidence and that it is unlikely to further the Commission's goals in implementing State energy policy or retail competition goals. We recommend that the Commission open a new proceeding to address these issues with a formal evidentiary record. These parties stand prepared to participate in this new proceeding from the perspective of the large electricity consumers who will be paying a significant part of the bill for new procurement. Our members take both bundled and DA service, so we have no interest in any solution that favors one set of consumers over another. We also recognize the need for new generation. Given the potential cost consequences of meeting the State's various, and sometimes conflicting, energy policy objectives, it is vitally important that future procurement be designed to minimize costs and unnecessary procurement to the greatest extent possible.

Dated: December 2, 2009

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I, the undersigned, declare that I am employed in the County of Contra Costa, California, that I am over the age of eighteen years and not a party to the within action. My business address is 67 Carr Drive; Moraga, CA 94556.

On December 2, 2009, I electronically served a true copy of the document described as **COMMENTS OF THE CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION, THE CALIFORNIA MANUFACTURERS & TECHNOLOGY ASSOCIATION AND THE ENERGY USERS FORUM ON THE PROPOSED DECISION ISSUES NOVEMBER 3, 2009** attached hereto on the accompanying service list. :

SEE ATTACHED SERVICE LIST

Executed on December 2, 2009 at Moraga, California.

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

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