

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking to Consider  
Refinements to and Further Development of the  
Commission's Resource Adequacy  
Requirements Program.

Rulemaking 05-12-013

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**OPENING COMMENTS OF SHELL  
ENERGY NORTH AMERICA (US), L.P. ON THE  
PRESIDING JUDGE'S PROPOSED DECISION**

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**Recommended Changes to the Proposed Decision**

1. Reject that portion of the PD that recommends that the Commission adopt a multi-year forward capacity commitment.
  
2. Modify the PD to provide that the proposed bulletin board should be integrated with commercially available trading platforms.

## **TABLE OF AUTHORITIES**

None

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In accordance with Rule 14.3 of the Commission's Rules of Practice and Procedure, Shell Energy North America (US), L.P. ("Shell Energy") files its opening comments on the proposed decision ("PD") that was circulated by Presiding Judge Mark Wetzell on November 3, 2009 in the above-referenced proceeding.

Shell Energy is an active participant in wholesale and retail markets in California. Shell Energy is an Energy Service Provider ("ESP") and accordingly is subject to the resource adequacy ("RA") obligations imposed upon load-serving entities ("LSE"). Shell Energy has been an active participant in this proceeding through its alignment with the Bilateral Trading Group. The opening comments submitted herein are exclusively the comments of Shell Energy, however.

## I.

### INTRODUCTION

Shell Energy's opening comments address three recommendations in the Judge's PD: First, Shell Energy supports the PD's recommendation to continue the current bilateral contracting approach with respect to the procurement of RA capacity. Second, the Commission should reject the PD's recommendation to impose a multi-year forward commitment on LSEs. Third, Shell Energy supports the PD's recommendation to establish an electronic bulletin board for RA capacity transactions. The Commission should integrate the bulletin board approach with commercially available trading platforms.

Proposed findings of fact and conclusions of law are set forth in Appendix A.

## II.

### THE CURRENT BILATERAL CONTRACTING APPROACH SHOULD BE AFFIRMED

Shell Energy operates in seven ISO control areas in the United States. The bilateral contracting mechanism that currently is in place in California is the most successful capacity procurement mechanism of the markets in which Shell Energy operates. Shell Energy supports the Presiding Judge's recommendation to continue with the current bilateral contracting approach to the procurement of RA, and encourages the Commission to continue allowing this procurement mechanism to work.

The PD suggests that there is a need to add requirements to the RA construct that would incent new generation construction. However, parallel decisions associated with RPS and LTPP provide other mechanisms for IOUs to procure new generation, and thus the RA mechanism has not been the primary vehicle for new capacity procurement.

By default, LSEs are procuring RA capacity in an environment of excess supply capacity. Accordingly, new generation is not presently being constructed under the RA mechanism. However, this situation will self-correct as the Commission moves to reliance on RA, and LSEs will be forced to contract for new generation to meet their load forecast obligations.

Although the current RA construct requires annual reporting of RA procurement by LSEs, LSEs are not constrained to engage exclusively in annual procurement, and some LSEs procure forward, on a voluntary basis, as they make economic decisions relative to the availability of capacity. It is reasonable for LSEs to continue to procure capacity due to their RA obligations. As scarcity conditions develop, LSEs will contract forward as economics dictate, whether that is limited by credit or driven by economics associated with the procurement of existing or new generation.

Shell Energy urges the Commission to resist the temptation to change the RA procurement mechanism. The RA program should be allowed to achieve its original intended goals. It is simply too early to determine that changes need to be made. Implementing new RA procurement requirements would add to the existing perception of regulatory uncertainty that is currently associated with California.

### **III.**

#### **A FIVE-YEAR MULTI-YEAR FORWARD COMMITMENT WOULD RESULT IN UNINTENDED ECONOMIC HARM, INCREASE CREDIT REQUIREMENTS AND REDUCE COMPETITION**

A five-year multi-year forward commitment (“MFC”) would result in substantial credit obligations imposed on contracting parties, whether in wholesale or retail markets. Many ESPs cannot carry the enormous burden of the additional credit requirements associated with a five-year procurement of RA capacity. These LSEs would likely seek mechanisms to shift these costs

onto end-use customers, potentially requiring new rules that would allow customers to take their RA capacity with them as they change providers.

Another deleterious consequence of an MFC would be the likely reduction of the number of ESPs that can participate in retail markets due to the higher credit requirements for RA procurement. Finally, wholesale entities, both generators and buyers, would require significant credit availability to transact. The Commission should remove the five-year MFC or defer consideration of this issue to another proceeding.

If the Commission were to choose to implement an MFC at this time, a two-year MFC would be more reasonable, as this is a conservative estimate of the time needed to procure and construct back-stop generation resources such as peakers, in the event that an LSE were to be deficient in its annual filing. This mechanism, in which an LSE would have capacity procured on its behalf (and be required to pay backstop procurement costs associated with its compliance), has provided an incentive to encourage LSEs to contract forward to ensure that they have sufficient capacity for their annual filings. To date, this has been a successful framework.

The PD suggests that a five-year MFPC would result in the construction of new generation resources. However, five years is too short a term for financing new generation. Most new generation construction requires a minimum of a ten-year contract. The PD's proposed five-year MFC would be insufficient to provide financing for new generation resources, and would result in significant credit requirements for market participants, with the unintended consequence of reducing competition in both wholesale and retail markets.

**IV.**

**THE PD'S PROPOSED BULLETIN BOARD APPROACH SHOULD BE INTEGRATED WITH COMMERCIALY AVAILABLE TRADING PLATFORMS, SUCH AS INTERCONTINENTALEXCHANGE**

As an RA standard capacity product ("SCP") develops, locational RA products will be more easily transacted, and will then be available for open trading on bulletin board systems as suggested in the PD. Commercially available platforms, such as IntercontinentalExchange ("ICE"), are currently providing similar functions for energy, providing liquidity and price transparency. RA capacity, with an SCP, would also benefit from liquidity and price transparency by using a commercially available trading platform, and would be a reasonable outgrowth of an SCP.

**V.**

**CONCLUSION**

The PD should be modified to eliminate the multi-year forward commitment for RA capacity. The PD also should be modified to integrate the proposed bulletin board approach with commercially available trading platforms such as ICE.

Proposed findings of fact and conclusions of law are set forth in Appendix A.

Respectfully submitted,

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Date: December 2, 2009

## APPENDIX A

### PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW

#### A. Proposed Revised Findings of Fact (FOF):

1. Eliminate FOF Nos. 3 and 4. Replace with the following:

The RA program structure should continue in its current form to allow the market to operate to provide incentives to construct new generation. Multi-year forward commitments for RA resources should not be required but should be allowed to continue on a voluntary basis.

2. Eliminate FOF No. 15.

#### B. Proposed Revised Conclusions of Law (“COL”):

1. Eliminate COL Nos. 2 and 5.
2. In COL No. 7, eliminate the words “combined with a multi-year forward commitment . . . .”





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