



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA

**FILED**

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Order Instituting Rulemaking to Integrate and )  
Refine Procurement Policies and Consider Long )  
Term Procurement Plans )  
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R.10-05-006  
(Filed May 6, 2010)

**SUPPLEMENTAL COMMENTS OF SOUTHERN CALIFORNIA EDISON  
COMPANY (U 338-E) ON PROPOSED PLANNING STANDARDS AND ASSUMPTIONS**

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Dated: **July 02, 2010**

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Pursuant to an e-mail message from Administrative Law Judge (ALJ) Victoria Kolakowski, received today at approximately 10:32 a.m., Southern California Edison Company (SCE) provides the following supplemental comments with respect to Energy Division Staff's (Staff) Proposed Planning Standards and Assumptions (Part 1).

Staff requests SCE's input on a variety of base case assumptions from Attachments 2 and 4 to ALJ Kolakowski's May 28 Ruling on Procurement Planning Standards and Setting Schedule for Comments and Workshops (May 28 Ruling). It is SCE's understanding that this input is requested to assist Staff in the development of required inputs and assumptions for the Commission-Directed Resource Plan and Commission-Directed Bundled Procurement Plan. This document represented SCE's efforts to provide the requested feed back under an expedited time frame. Although SCE offers these as its best suggestions to Staff in light of Staff's directions, constraints, currently proposed assumptions, and objectives, SCE does not offer an opinion as to whether all of the planning sources and assumptions ultimately adopted by Staff will represent the best possible planning sources and assumptions, and reserves the right to offer

suggestions for improvement and/or analyses that use different planning sources and assumptions on July 12, July 16 and/or at any subsequent opportunity, as appropriate.

These suggestions maintain the distinction between system and bundled planning, and in fact, some of the suggested sources are different for the system and bundled plans. These responses are provided in the order requested, but are not provided in the Matrix format requested by Staff due to space constraints. SCE added a reference column to the spreadsheet Matrix (included as Attachment 1) to avoid confusion in correlating its response to the Matrix.

## I.

### **RESOURCE PLANNING ASSUMPTIONS**

#### **A. Demand Response (DR)**

SCE supports the use of the Load Impact Protocols (LIP) for Demand Response (DR) values in the LTPP. LIPs are the basis for DR values used in the Resource Adequacy (RA) program and thus would put DR on a comparable basis with generation in the LTPP analysis (assuming net qualifying capacity values are being used for generation in the LTPP analysis). Appropriate accounting for the DR programs must also include the 15% planning reserve benefits of such programs.

#### **B. Resource Additions and Requirements**

SCE believes the base case should reflect a realistic estimate of resource additions and retirements. It is SCE's view that the California Independent System Operator's (CAISO) Renewable Integration Study provides a good starting point. That said, the report should not stand alone, as this analysis modeled only the year 2020. New planning information should always be used to update the CAISO Renewable Integration Study to the extent practical. While the IOUs have updated information, especially for new renewable contracts and other Commission-approved solicitations, the Commission should also look to energy service

providers, independent power producers, publicly-owned utilities and others to contribute information for any updates.

**C. System Assumptions – Cost**

**1. Generic Conventional Resource Cost and Performance**

SCE suggests that the California Energy Commission (CEC) estimates for conventional resources are likely the most public source. That said, SCE has reservations about accepting all of those estimates without detailed evaluation. Combustion turbine costs in the CEC data, in particular, do not appear to be reflective of SCE's experience.

**2. New Generation Tax and Financing Assumptions (Non-renewable)**

SCE believes that financial assumptions about new generation should be based on actual merchant experience and that system planning should be based on a referent price (possibly a value that all the IOUs and merchants could jointly develop) with a 30-year life. The life of the resource is an important issue, since it is somewhat different for the bundled plan where contract costs related to ten-year payback are more appropriate.

**3. Transmission Cost Assumptions (Non-renewable)**

SCE has considered many of the transmission cost studies and the underlying assumptions. RETI appears to be a reasonable public source for these costs. However, SCE questions the relevance of non-renewable transmission costs as a category in light of the fact that the new transmission envisioned to accommodate renewables will serve new conventional resources equally well, if such resources can be sited near these renewable lines. With this question in mind, SCE's recommendation should be treated as tentative.

#### **4. GHG Policy Assumptions**

SCE appreciates Staff's desire to anticipate greenhouse gas (GHG) policy. It questions, however, the utility of trying to decide on information sources prior to the development of the GHG policy itself. For that reason, SCE declines to guess at appropriate information resources. Joint agreement on such assumptions, closer to the time when the modeling is done, might be a solution, as policy issues can change very quickly.

#### **D. System Assumptions – Sensitivities**

##### **1. Natural Gas**

For gas price sensitivity, SCE would concur with the 90%-10% confidence range offered by Pacific Gas and Electric Company and a base case from the California Gas Report or CEC Forecast.

##### **2. CO<sub>2</sub> Price**

For CO<sub>2</sub>, SCE suggests using the Synapse High and Low-Cases resulting from the Market Price Referent (MPR) forecast methodology.

##### **3. Need Level**

SCE sees need level as a variable more reasonably treated through development of likely scenarios. SCE's experience with need level is that varying the assumptions about technology and costs produces material variations in need level so that scenario selection for examination is the more pertinent question rather than sensitivity of need.

##### **4. Technology Cost**

It is likely that costs will decline for many new technologies. Accurately predicting those declines by technology, however, is quite difficult. Because the market will ultimately dictate the most appropriate technology, and therefore the technology that will have production and

deployment rates high enough to support lower prices, assuming a decay rate for costs may under-price future technologies and result in over-procurement of those technologies. In addition, history has shown that it is very difficult to predict future technology costs.

This way of thinking about technology changes leads to the idea that technology options are best performed as a scenario with fixed prices rather than as a sensitivity analysis. These scenarios can then be updated biennially through the LTPP proceeding. In this way, current pricing and technologies can continually inform the resource plans.

## **II.**

### **BUNDLED PLANNING ASSUMPTIONS**

#### **A. Bundled Assumptions – Bundled Need**

##### **1. DR**

SCE supports the use of the same sources of DR estimates as are used in the System Resource Plans.

#### **B. Bundled Assumptions – Cost**

##### **1. Generic Conventional Resource Cost and Performance**

In the bundled plan, SCE recommends that the cost of energy from generic resources needed to fill a short position be based on the gas price forecast, which is the primary driver for energy market prices. For capacity, SCE suggests that the Commission's RA penalty price would provide a reasonable estimate of cost, as it provides a rough ceiling for RA purchase prices. A further benefit would be that likely changes in that penalty could easily be reflected in the analysis.

## **2. Generic Renewable Resource Cost and Performance**

In the case of renewable resource cost, SCE does not expect a substantial quantity of renewables to be offered in its all-source RFOs, and its contract pricing in this case is not a reliable predictor of future prices.

## **3. GHG Policy Assumptions**

As stated in the discussion about the System planning analysis, SCE believes it is prudent to wait for the GHG rules to be finalized before building assumptions about their nature.

## **C. Bundled Assumptions – Sensitivities**

### **1. Natural Gas**

SCE agrees with the sensitivity method suggested by PG&E. That is, to maintain the dispatch by maintaining a base case heat rate and then determining a new power curve that reflects the new gas price. SCE would prefer to use a +/- \$1 range for this analysis, rather than looking to a distribution curve to determine appropriate levels. This said, the range should be a target and not a binding requirement for the study.

### **2. CO<sub>2</sub> Price**

CO<sub>2</sub> price sensitivity for bundled assumptions can be the same as is used for the system analysis.

### **3. Need Level**

Scenarios for bundled customer need could be developed based on economic growth and Direct Access penetration levels. However, such scenarios would be of a very different nature than system assessment scenarios, which would focus on technology, transmission, phase-out of resources that utilize once-through-cooling, etc. In order to avoid the need to develop new

scenarios, SCE recommends that high and low case sensitivities be developed as +/- 5% around the base case bundled need.

Respectfully submitted,

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*/s/ Deana Michelle Ng*

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July 02, 2010

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of the **SUPPLEMENTAL COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON PROPOSED PLANNING STANDARDS AND ASSUMPTIONS** on all parties identified on the attached service list(s).

Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **2nd day of July, 2010**, at Rosemead, California.

*/s/ Raquel Ippoliti* \_\_\_\_\_

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