



**FILED**

07-02-10  
04:59 PM

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

Order Instituting Rulemaking to  
Integrate and Refine Procurement  
Policies and Consider Long-Term  
Procurement Plans.

Rulemaking 10-05-006  
Filed May 6, 2010

**REPLY COMMENTS OF  
THE COGENERATION ASSOCIATION OF CALIFORNIA  
REGARDING RESOURCE PLANNING ASSUMPTIONS – PART 1**

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July 2, 2010

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

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.

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REGARDING RESOURCE PLANNING ASSUMPTIONS – PART 1**

The Cogeneration Association of California (CAC)<sup>1</sup> provides the following reply to parties' comments dated June 25, 2010 in this matter. These comments clarify that the amount of existing CHP resources on the IOUs' systems is an established capacity amount. The Commission should properly rely upon this capacity figure as an explicit planning assumption for system resource and bundled procurement plans.

This proceeding has two material guidelines for the parties. First, the proceeding is not an opportunity to re-litigate issues already determined in another proceeding. Second, the proceeding is to refine and implement Commission policies and decisions related to procurement.<sup>2</sup> CAC's comments follow the OIR's directive regarding implementation. CAC is not re-litigating issues related to CHP procurement. Rather, CAC urges the implementation of

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<sup>1</sup> CAC represents the combined heat and power and cogeneration operation interests of the following entities: Coalinga Cogeneration Company, Mid-Set Cogeneration Company, Kern River Cogeneration Company, Sycamore Cogeneration Company, Sargent Canyon Cogeneration Company, Salinas River Cogeneration Company, Midway Sunset Cogeneration Company and Watson Cogeneration Company.

<sup>2</sup> *Order Instituting Rulemaking*, R.10-05-006, May 6, 2010.

adopted CPUC policy with CHP specific capacity figures from the IOUs' own reports.

In D.07-09-040, the Commission required that the IOUs offer new standard contracts to all existing QFs.<sup>3</sup> The term QF in this instance referred to Qualifying Facilities including CHP cogeneration QFs. Additionally, in D.07-12-052, the Commission ordered the IOUs "to at least maintain their current QF capacity over the next decade," subject to PURPA obligations.<sup>4</sup> These prior decisions of the Commission remain valid and set a prerequisite for all procurement plans in terms of QF resources, requiring any procurement plans to recognize the continued use of existing QFs, including CHP QFs.

The issue over the amount of QF versus CHP QF capacity is a relevant implementation issue. CHP QFs are a subset of total QF capacity as referenced in D.07-12-052. However, using the IOUs' own reports that distinguish CHP QFs from QFs generally is not a re-litigated issue. It is a specific clarification of the CHP capacity to be sustained or procured.

CAC's comments set the current level of CHP capacity at 4,596 MW. The semi-annual reports of QF resources published by the IOUs document this amount of CHP QF capacity.<sup>5</sup> The planning assumptions should separate CHP

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<sup>3</sup> D.07-09-040, at p. 120.

<sup>4</sup> D.07-12-052, at p. 85.

<sup>5</sup> The January 2010 Cogeneration and Small Power Production Annual Reports enable determination of existing CHP QF levels distinct from renewable QF levels. CAC's proposal subtracted coal-fired CHP from total CHP to arrive at 4,596 MW.

Utility	Total CHP Capacity	Capacity from Coal CHP	Current CHP Capacity
SCE (Pages 8 to 10)	2,206.768 MW	(200.500 MW)	2,006.268 MW

facilities from the remainder of QFs given that the Commission has separate programs to protect and encourage renewable QF development. This separation of CHP QFs from other QF resources is also appropriate given the scoping order in this case. The scoping order contemplates separate planning assumptions for renewable and fossil-fueled generation.

TURN and DRA refer to the “QF Summit” settlement negotiations addressing some of the issues relevant to this proceeding. TURN suggests *“the scoping memo should anticipate a successful settlement process and provide that CHP procurement issues will only be considered in this proceeding if the settlement talks collapse.”*<sup>6</sup> DRA believes *“[t]he Commission should not make a determination on need for incremental CHP in this proceeding, as this is an issue in the QF global settlement negotiation, which is ongoing.”*<sup>7</sup> Given the confidentiality imposed on the QF Summit, the Commission cannot anticipate any progress or outcome from the negotiations. By its very nature, a settlement negotiation, until successfully finalized, is an uncertain process. The Commission must regard the settlement negotiations as a black box: if it produces a result, that result can be incorporated in the procurement process;

PG&E (Pages 1-1 to 1-3 )	2,439.633 MW	(180.400 MW)	2,259.233 MW
SDG&E ("Project Status Summary" tab)	331.276 MW	( 0.000 MW)	331.276 MW
		Total	4,596.777 MW

The reports are available online at:

PG&E: <http://www.pge.com/b2b/energysupply/qualifyingfacilities/cogeneration/>;

SCE: [http://www.sce.com/NR/rdonlyres/E4ABE892-DCEB-4788-BA19-B1047B5088C2/0/1001\\_QFSemiAnnualReport.pdf](http://www.sce.com/NR/rdonlyres/E4ABE892-DCEB-4788-BA19-B1047B5088C2/0/1001_QFSemiAnnualReport.pdf);

SDG&E: [http://www2.sdge.com/srac/Jul Dec 2009.htm](http://www2.sdge.com/srac/Jul_Dec_2009.htm)).

<sup>6</sup> TURN Comments, June 25, 2010, p. 5.

<sup>7</sup> DRA Comments, June 25, 2010, p. 5.

otherwise, it must be ignored. Given the Commission's holding that all prior procurement decisions will be honored in this case, the scoping order must be based on those decisions and not on any unknown and uncertain outcome of settlement negotiations.

Respectfully submitted,

A handwritten signature in black ink, reading "Michael Alcantar". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Michael Alcantar

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July 2, 2010

## CERTIFICATE OF SERVICE

I, Kari Harteloo hereby certify that I have on this date caused the attached **REPLY COMMENTS OF THE COGENERATION ASSOCIATION OF CALIFORNIA REGARDING RESOURCE PLANNING ASSUMPTIONS – PART 1** to be served to all known parties by either United States mail or electronic mail, to each party named in the attached official service list obtained from the Commission's website pursuant to the Commission's Rules of Practice and Procedure.

Dated July 2, 2010, at Portland, Oregon.

A handwritten signature in black ink that reads "Kari Harteloo" followed by a long horizontal flourish.

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