



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

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Order Instituting Rulemaking to Continue  
Implementation and Administration of California  
Renewables Portfolio Standard Program.

Rulemaking 08-08-009  
(Filed August 21, 2008)

**REPLY COMMENTS OF CALIFORNIANS FOR RENEWABLE ENERGY, INC.  
(CARE) ON THE PROPOSED DECISION (PD) ADOPTING THE RENEWABLE  
AUCTION MECHANISM**

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October 7<sup>th</sup>, 2010

In accordance with Rule 14.3 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, and by leave of the ALJ extending the filing of reply comments to October 7, 2010, Californians for Renewable Energy, Inc. (CARE) respectfully submits the following reply comments regarding the Proposed Decision of ALJ Mattson Adopting the Renewable Auction Mechanism (“PD”).

The proposed decision should be withdrawn because it violates the FERC’s exclusive statutory authority under the Federal Power Act to regulate the rates for wholesale energy and ancillary services. According to the following Parties’ opening comments they all support the PD’s renewable auction mechanism (RAM) feed-in tariff (FIT). L. Jan Reid’s comments support the RAM with a 120% SPT. According to Fuel Cell Energy Inc. it supports “a RAM designed to facilitate development of diverse renewable resources, including fuel cell technologies”. ”CALSEIA supports Reverse Auction Mechanism for renewable projects 3MW and above and a fixed price (Feed in Tariff) for projects 3MW and below, consistent with SB 32 (Negrete-McLeod, 2009)”. ”DRA supports the adoption of the RAM since it should spur the development of low-cost renewable projects at the distribution level in the near term and provide an effective new tool for renewable energy procurement”. ”Recurrent Energy strongly supports the Proposed Decision”. “The Solar Alliance applauds the PD in its proposed adoption of a Renewable Auction Mechanism (RAM) mechanism for transactions up to 20 MW“. “Axio is largely supportive of the PD”. “LS Power strongly supports the PD”,<sup>1</sup> and according to enXco, Inc. “[w]e reiterate our strong support for the PD on the renewable auction mechanism”.<sup>2</sup>

These Parties presume wrongly the PD’s RAM proposal does not violate the Federal Energy Regulatory Commission’s jurisdictional authority over wholesale rates. As SCE states in its comments at 5 “[t]he RAM, as proposed in the PD, compels the IOUs to purchase wholesale power if it is offered at or below 150% of the MPR. As set forth in SCE’s prior filings outlining the scope of FERC’s jurisdiction,<sup>3</sup> the Federal Power Act (“FPA”) grants exclusive jurisdiction to the FERC to regulate wholesale sales of electricity in interstate commerce. One exception to this general rule provides that a state may regulate the sales from Qualifying Facilities (“QFs”),

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<sup>1</sup> Prior Parties listed comments at page 1.

<sup>2</sup> enXco, Inc. comments at 21

<sup>3</sup> See SCE’s Opening and Reply Briefs on Jurisdiction in the Setting of Prices for a Feed-in Tariff, dated June 18, 2009 and July 10, 2009.

but the rate for such sales cannot exceed the avoided cost of the purchasing utility pursuant to the Public Utility Regulatory Policies Act of 1978 (“PURPA”).<sup>[4]</sup> Accordingly, a pricing structure such as the RAM which mandates the purchase of power at a price above avoided cost is unlawful, even if that structure is set within an auction framework.”

PG&E agrees stating at 4 “the PD’s proposed RAM program structure, a must-take obligation up to a specified price (the SPT), runs the risk of violating the Federal Power Act and the restrictions on a state’s ability to set rates for wholesale energy sales in interstate commerce. The Federal Power Act could be implicated if auction results demonstrate an absence of real competition. For example, a Federal Power Act violation could occur if all or virtually all bids into an auction are priced at just below the SPT. Because the PD would require the IOUs to take all of these identically priced offers up to the capacity cap, the RAM could effectively result in the setting of a wholesale power price and face a Federal Power Act challenge...”

Likewise SDG&E at 4 to 5 states “[t]he PD proposes the RAM as a “competitive market approach for setting the FIT price.”<sup>[5]</sup> Because participants in the RAM FIT program are not required to have Qualifying Facility (“QF”) status under the federal Public Utility Regulatory Policies Act of 1978 (“PURPA”), exclusive authority to set wholesale rates for the generation sold through the program rests with the Federal Energy Regulatory Commission (“FERC”).<sup>[6]</sup> The PD acknowledges this jurisdictional limitation and asserts that “RAM does not result in our setting the price, but relies on a market mechanism that is compatible with FERC’s rate-setting in the wholesale market.”<sup>[7]</sup> In essence, the PD concludes that by relying on a market-based pricing mechanism rather than incorporating Commission-approved rates, “RAM avoids or eliminates the jurisdictional issue.”<sup>[8]</sup>...The analysis underlying this conclusion is flawed and incomplete.”

Interestingly even the FIT Coalition reluctantly admits at 15 “[i]t will also be important for FIT projects to register as Qualifying Facilities, again pursuant to the July FERC decision. The PD opts against requiring QF registration to qualify as a RAM project and we are not suggesting that the Commission should require such. However, it is clear under recent FERC

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<sup>4</sup> See 16 U.S.C. §824a-3(b); 18 C.F.R. §292.304(a)(2).

<sup>5</sup> PD, p. 26.

<sup>6</sup> See, e.g., *Nantahala Power & Light Co. et al. v. Thornburg, Attorney General of North Carolina, et al.*, 476 U.S. 953, 966 (1986); *Federal Power Commission v. Florida Power & Light*, 404 U.S. 453 (1972).

<sup>7</sup> PD, p. 40.

<sup>8</sup> *Id.*

guidance that for this value-based FIT program to be compliant with federal law that projects receiving FIT contracts will have to register as QFs.”

One of the problems with the RAM FIT is it treats all types of renewable energy sellers capacity value the same irrespective of the type of renewable resource. This under values the resources like PV solar because PV solar has a higher capacity value during peak demand compared to wind power for example. Most forms of renewable energy (except for hydro power) are intermittent and unreliable during periods of peak demand. Even hydro is unreliable during a drought. Solar has the highest capacity factor during peak demand when people are operating air conditioners, while wind power has the lowest capacity factor during peak demand because its highest production occurs in the early morning, late evening, and the middle of the night. This means increased emissions (counter to AB 32’s purposes) will be incurred by new wind projects in the form of more reliable gas turbine power during periods of peak demand in comparison to PV solar.

A QF FIT Seller isn’t just paid for their delivered “energy” as envisioned in the RAM but they are also directly compensated for their installed “capacity” as well, i.e. a QF contract is for energy and capacity. Because the Commission has failed to properly value of different types of renewable resources in the RAM FIT it undervalues the capacity value of PV solar and over-values the capacity value of wind power.

“enXco is a major developer of wind and solar projects in the U.S., Canada and Mexico. Headquartered in San Diego, enXco has developed nearly 2,000 MW of wind projects, and has 89 MW of solar photovoltaic (“PV”) capacity in operation or under construction in the U.S. and Canada.”<sup>9</sup> Why else would enXco give its “strong support for the PD on the renewable auction mechanism” except because its investments are more than twenty times greater in wind power capacity than in PV solar?

CARE agrees with the valuation methodology for installed PV solar capacity based on the IOUs own UOG costs for PV solar as described in Solutions for Utilities comments at 8.

[W]e would suggest the CPUC consider adopting a FERC/CPUC price mechanism as described here. One way of determining what the utility would pay is to look to the Utility Owned Generation portion of the SPVP of SCE in Rulemaking R.08-08- 009. This SPVP program is of comparative size to the 1.5-

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<sup>9</sup> enXco, Inc. comments at 2.

3MW Feed-In Tariff generator. SCE describes, in its 7-1-10 filing entitled "SCE (U 338-E) Annual Compliance Report on the Solar Photovoltaic Program", found at: <http://docs.cpuc.ca.gov/EFILE/REPORT/120795.htm>, at page 3, Commission approved (per D.09-06-049) direct capital expenditures of \$3.50 per watt (dc) with a 10% contingency; totaling \$3.85 per watt (dc).

However, on page 6 of that same document, SCE describes a reasonableness cap of \$5.50 per watt (See SCE's SPVP Testimony; A.08-03- 015 at 43); and then goes on to state, quote:

**"SCE's actual capital expenditures for the first two UOG sites are lower than the reasonableness threshold of \$5.50 per watt (dc). UOG Site 1 has an installed cost of \$4.95 per watt (2009 dollars) and UOG Site 2 has an installed cost of \$4.94 per watt (2009 dollars). Accordingly, these expenditures are deemed reasonable pursuant to D.0-06-049."**

Therefore, the Commission would be acting reasonably, based on FERC's guidelines, to set the rate for the Feed-In-Tariff for 1.5-3MW projects at SCE's own cost of **\$4.94-\$4.95** per watt (dc) for capacity only.

With the caveat that the FIT seller be a QF CARE supports Sierra Club's pricing strategy at 2 to3.

Sierra Club supports feed-in tariff prices that meet the following criteria:

- a) Prices are established in advance to control costs, create transparency, and reduce market risk for both project developers and consumers;
- b) Prices are differentiated by technology to support a diverse portfolio of energy resources, by design;
- c) Prices are sufficient to recover normal costs of each technology, plus a reasonable rate of profit, to insure that projects are financially viable.

We also agree with Sierra Club that "[d]istributed generation (DG) provides several key benefits to California: DG reduces the environmental footprint of renewable energy development, DG avoids much of the cost and delay inherent in transmission projects, DG creates jobs in local communities, DG increases grid resources in demand centers, DG reduces air pollution and damage to public health in non-attainment zones and disadvantaged communities" and CARE also supports a PD with "a more expansive and inclusive FIT pricing structure that allows for wide participation of homeowners, small businesses and a wide range of community scale projects and technologies."

Respectfully Submitted,



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October 7<sup>th</sup>, 2010

**Verification**

I am an officer of the Intervening Corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except 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 this 7<sup>th</sup> day of October 2010, at San Francisco, California.



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Lynne Brown Vice-President  
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## Certificate of Service

I hereby certify that I served the foregoing document “*REPLY COMMENTS OF CALIFORNIANS FOR RENEWABLE ENERGY, INC. (CARE) ON THE PROPOSED DECISION (PD) ADOPTING THE RENEWABLE AUCTION MECHANISM*” under CPUC Docket R.08-08-009. Each person designated on the official service list, has been provided a copy via e-mail, to all persons on the attached service lists on October 7, 2010 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.

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

Executed on this 7<sup>th</sup> day of October 2010, at Soquel, California.



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