

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



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Order Instituting Rulemaking to Develop Additional  
Methods to Implement the California Renewables  
Portfolio Standard Program.

Rulemaking 06-02-012  
(Filed February 16, 2006)

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

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

**JOINT REPLY COMMENTS OF THE ALLIANCE FOR RETAIL ENERGY  
MARKETS, THE DIRECT ACCESS CUSTOMER COALITION, THE CALIFORNIA  
STATE UNIVERSITY, THE SCHOOL PROJECT FOR UTILITY RATE REDUCTION,  
WALMART STORES, COMMERCE ENERGY, 3 PHASES RENEWABLES AND THE  
WESTERN POWER TRADING FORUM  
ON THE REVISED PROPOSED DECISION OF COMMISSIONER PEEVEY**

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**ON BEHALF OF THE JOINT PARTIES**

November 12, 2010

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WALMART STORES, COMMERCE ENERGY, 3 PHASES RENEWABLES  
AND THE WESTERN POWER TRADING FORUM  
ON THE REVISED PROPOSED DECISION OF COMMISSIONER PEEVEY**

In accordance with the October 27, 2010 Administrative Law Judge’s Ruling (“ALJ’s Ruling”), the Alliance for Retail Energy Markets (“AReM”),<sup>1</sup> the Direct Access Customer Coalition, The California State University, the School Project for Utility Rate Reduction, Walmart Stores, Inc., Commerce Energy, Inc., 3 Phases Renewables, LLC, and the Western Power Trading Forum (collectively, the “Joint Parties”) respectfully submit these joint reply comments on the Revised Proposed Decision of Commissioner Peevey (“Revised PD”).

**I. INTRODUCTION**

The illogic of interpreting new Section 365.1 of the Public Utilities Code as prohibiting the Commission from differentiating between the different classes of load-serving entities (“LSEs”) in the rules it adopts to implement the Renewable Portfolio Standard (“RPS”) is amply illustrated in the opening comments of Pacific Gas and Electric Company (“PG&E”) and Southern California Edison Company (“SCE”) on the Revised PD. Adopting the contorted logic

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<sup>1</sup> The positions taken in this filing represent the views of AReM and its members but not necessarily the affiliates of its members with respect to the issues addressed herein.

of PG&E and SCE would transform each and every rule adopted in Decision (“D.”) 10-03-021 to govern the use of tradable renewable energy credits (“TRECs”) for RPS compliance into a “requirement” that must be applied “equally” to all LSEs. As such, according to PG&E and SCE, TREC rules adopted specifically to protect the IOUs’ captive ratepayers must be imposed—lock, stock and barrel—on electric service providers (“ESPs”), regardless of the fact that their customers are free to change providers at will.<sup>2</sup>

Moreover, PG&E’s and SCE’s claims that anything short of “equal” application of all the TREC rules adopted in D.10-03-021 to ESPs would unfairly disadvantage the IOUs are wholly without merit. In fact, the IOUs’ regulatory framework provides them guaranteed recovery of their RPS investments, a fact that provides the IOUs with significant advantages over ESPs in competing for RPS-eligible resources that clearly outweigh any of the alleged disadvantages that they claim accrue as a result of the imposition of a temporary limit on their use of TRECs. Furthermore, making ESPs subject to the TREC usage limit retroactively, as PG&E and SCE insist Section 365.1 requires, would violate the rule against retroactive rulemaking. Likewise, it would be both unfair and unlawful for the Commission to retroactively categorize as “REC-only” any transactions with out-of-state RPS-eligible resources that ESPs made in reliance on the “safe harbor” for such transactions provided under D.10-05-018.

## II. REPLY COMMENTS

### A. **Making ESPs Subject to All of the TREC Rules Adopted in D.10-03-021 Would Be Absurd and Contrary to the Legislature’s Intent.**

In their opening comments, both PG&E and SCE assert the Commission is required by Section 365.1 to make ESPs subject to all of the TREC rules adopted in D.10-03-021. Under their interpretation of Section 365.1, the Commission must either (a) eliminate the TREC usage limit and the TREC price cap altogether, or (b) make ESPs subject to both rules retroactively and despite the lack of any compelling reason or statutory imperative for doing so.

Obviously, it makes no sense to make ESPs subject to the TREC price cap, as the price cap is only relevant to the Commission’s determination of what TREC transactions the Commission will approve so that the IOUs may recover the associated costs in rates. Since the Commission has no authority to regulate the rates and terms and conditions of service offered by

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<sup>2</sup> Direct access customers may change providers at any time subject only to the terms of their freely negotiated service contracts and the notice requirements provided in the Direct Access Switching Rules)

ESPs, there is no basis upon which the Commission could enforce their compliance with a TREC price cap. Indeed, neither PG&E nor SCE offer any sort of explanation as to how the TREC price cap would be applied to or enforced against ESPs. PG&E's and SCE's insistence that Section 365.1 eliminates all Commission discretion with respect to the application of RPS program rules to ESPs when they cannot offer any way that the certain of those rules could even be applied to ESPs or enforced reveals just how illogical and misplaced their arguments truly are.

The Commission's description of both the TREC usage limit and the TREC price cap in D.10-03-021 as "ratepayer protection" mechanisms was unequivocal. Their sole intended purpose and effect is to give the Commission some control over the IOUs' expenditures for TRECs, which otherwise would be completely unrestrained given the IOUs' statutory guarantee of fully recovering their RPS compliance costs in rates. As there is no need for the Commission to control the spending of ESPs in their efforts to meet their RPS requirements, and indeed the Commission has no authority in that regard, there is no compelling reason for the Commission to try to impose either the TREC usage limit or the TREC price cap on ESPs. Stated another way, it makes no sense for the Commission to be "required" to apply bundled customer ratepayer protection rules to ESPs, and it thus makes no sense to interpret Section 365.1 as requiring that outcome.

**B. TURN's Arguments for Extending the TREC Usage Limit to ESPs Are Flawed and Parochial.**

Contrary to TURN's contention that it would constitute "legal error" for the Commission to adopt usage limits for the IOUs and not ESPs, Section 399.16(a)(7) does not require the Commission the adopt TREC usage limits for any retail seller, and the Commission is free to adopt a TREC usage limit for only one class of retail seller or not adopt any TREC usage limit at all. Moreover, TURN's narrow view of the relationship between TRECs and RPS program benefits is inconsistent with the extensive record in this proceeding concerning the potential impact a TREC market could have in terms of furthering the goals of the RPS program, including the development of in-state resources.

**C. The TREC Usage Limit Would Impair the Ability of ESPs to Meet the 20% RPS Requirement.**

If ESPs are made subject to the TREC usage limit, it will make it more difficult for ESPs to meet the 20% RPS requirement while having little if any practical effect on the IOUs' compliance efforts. If the Commission does not retain the exemption for ESPs from the TREC

usage limit, to mitigate the unfairly and unlawfully discriminatory impact on ESPs, the Commission should consider modifying D.10-03-021 so that the TREC percentage limit is not a limit on the portion of a LSE's APT that can be met with TRECs, but rather a percentage limit on the total deliveries under new contracts on a going forward basis. While this would not result in perfect parity between the IOUs and ESPs in terms of the practical effect of the TREC usage limit, it would be far closer than under the percentage of APT limit adopted in D.10-03-021.

As an example, consider an IOU that has already reached at least 14% of the 20% RPS target and needs 6% or less of additional procurement (as a percentage of its total retail sales) to meet that target. The IOU would be able to meet the entire remaining RPS procurement target within the 30% TREC limit proposed in the Revised PD by virtue of the fact that all deliveries under its existing RPS contracts would be grandfathered and therefore not count towards the 30% TREC usage limit. Thus, the TREC limit as adopted in D.10-03-021 (and modified under the Revised PD) would have no effect on the RPS procurement for an IOUs as long as it is already at or above the 14% RPS compliance mark. Consistent with this premise, it is noteworthy that PG&E's opening comments do not take any issue with the lowering of the proposed TREC limit from 40% to 30%. In contrast, ESPs without the same level of grandfathered long-term contracts to achieve the same level of RPS compliance for future years would be more significantly impacted by the proposed TREC limitation, creating a discriminatory result even though ostensibly reflecting "equal" treatment.

An alternative TREC limit that applies as a percent of total deliveries on a going forward basis, would level the impact of the TREC limitation on both IOUs and ESPs. For example, a retail seller that has reached the 14% RPS mark in a future year would only be able to procure and additional 1.8% (i.e., 30% of the remaining 6%) as TRECs under this alternate design. Such a limit while more restrictive than the one proposed in D.10-03-021 for IOUs, but would be less discriminatory in that it actually has an impact on both IOUs and ESPs and not just the ESPs.

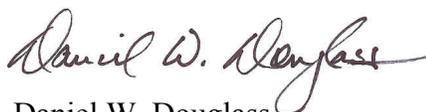
To be clear, the Joint Parties are NOT suggesting that the Commission adopt a more restrictive TREC limit for any retail seller including the IOUs; indeed the Joint Parties do not support any restrictions on the use of TRECs for any party. Rather, the Joint Parties are merely alerting the Commission to the discriminatory result that would arise if the TREC limits proposed in D.10-03-021 were to be applied to ESPs. The simplest solution is to exempt the ESPs from the proposed TREC limits as has been thoroughly supported in earlier proposed

decisions. The alternative TREC limit applicable to a percentage of going-forward deliveries should only be considered if the Commission determines that it must apply a TREC limitation to ESPs. Even in this instance, any TREC limitation on ESPs must only be applied prospectively.

### **III. CONCLUSION**

For the reasons above, the Commission should reject the interpretation of Section 365.1 advocated by PG&E and SCE, recognize that it has lawful discretion to impose a TREC usage limit on the IOUs, and not on EPS, and then do so. If, nevertheless, the TREC usage limit is to be extended to ESPs, the Commission must ensure that it is done so only on a prospective basis, and should also take other measures as described in these reply comments and the Joint Parties' opening comments to ensure that ESPs are not unfairly disadvantaged compared to the IOUs in terms of their ability to meet the 20% RPS requirement in 2010 and beyond.

Respectfully submitted,



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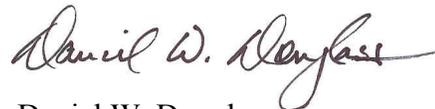
**ON BEHALF OF THE JOINT PARTIES**

November 12, 2010

## VERIFICATION

I, Daniel Douglass, am counsel for the Alliance for Retail Energy Markets, the Direct Access Customer Coalition, the Western Power Trading Forum and on behalf of the Joint Parties and am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing *Joint Reply Comments of the Alliance for Retail Energy Markets, the Direct Access Customer Coalition, The California State University, the School Project for Utility Rate Reduction, Wal-Mart Stores, Inc., Commerce Energy, Inc., 3 Phases Renewables, LLC, and the Western Power Trading Forum on the Revised Proposed Decision of Commissioner Peevey*, filed in *R.06-02-012* and *R.08-08-009*, are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

Executed on November 12, 2010, at Woodland Hills, California.



Daniel W. Douglass  
DOUGLASS & LIDDELL

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing *Joint Reply Comments of the Alliance for Retail Energy Markets, the Direct Access Customer Coalition, The California State University, the School Project for Utility Rate Reduction, Wal-Mart Stores, Inc., Commerce Energy, Inc., 3 Phases Renewables, LLC, and the Western Power Trading Forum on the Revised Proposed Decision of Commissioner Peevey* on all parties of record in proceeding *R.06-02-012* and *R.08-08-009* by serving an electronic copy on their email addresses of record and by mailing a properly addressed copy by first-class mail with postage prepaid to each party for whom an email address is not available.

Executed on November 12, 2010, at Woodland Hills, California.

  
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Michelle Dangott

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