

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



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In the matter of the Application of Pacific Corp (U901E) for approval to implement a Net Surplus Compensation Rate.

Application 10-03-001
(Filed March 1, 2010)

And Related Matters.

Application 10-03-010
Application 10-03-012
Application 10-03-013
Application 10-03-017

**COMMENTS OF THE CITY OF SAN DIEGO
ON THE PROPOSED DECISION OF
ADMINISTRATIVE LAW JUDGE DOROTHY DUDA**

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In the matter of the Application of Pacific Corp (U901E) for approval to implement a Net Surplus Compensation Rate.

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I. Introduction

Pursuant to Rule 14.3 of the California Public Utilities Commission's (Commission or CPUC) Rules of Practice and Procedure, the City of San Diego (City) submits these comments on the Proposed Decision (PD) of Administrative Law Judge (ALJ) Dorothy Duda.

The City appreciates the PD's effort to implement a Net Surplus Compensation Rate (NSCR) pursuant to Assembly Bill (AB) 920. In these comments, the City requests clarification of the PD regarding eligibility for the NSCR. The City also recommends that if the Commission adopts Pacific Gas & Electric's (PG&E's) proposal for using average prices from the default load aggregation points (DLAPs) for determination of NSCR that the PD be revised to average those prices over the hours in which most Net Energy

Metering (NEM) customers inject power into the grid, which will be a shorter time frame than the hours of daylight. Finally, the City also notes that the Commission has wide latitude to determine the appropriate avoided cost rates and, thus, the City urges the Commission to adopt a NSCR that is consistent with previous Commission decisions and the efforts of the California Legislature to promote renewable power.

II. The Commission Should Clarify Eligibility Requirements

The City recommends that the Commission modify the PD to clarify that NEM customers are eligible to receive compensation under the NSCR program even if the customer does not own the renewable energy credit (REC) or chooses not to certify the REC because it may be effectively impossible or administratively burdensome to comply with California Energy Commission (CEC) and Western Renewable Energy Generation Information System (WREGIS) requirements. This interpretation appears to be consistent with the PD and is implied, but not explicitly stated. In addition, the Commission should make explicit that customers should receive compensation for the “value of the electricity itself,” but not the “value of the renewable attributes of the electricity,”¹ if they cannot provide RECs associated with their surplus generation to the purchasing utility.

The PD appears to allow customers that cannot or do not provide their RECs to the purchasing utility to participate in the NSCR program. For example, the PD discusses the specific case where a customer has sold its RECs and states that “[A]ny NEM

¹ California Public Utilities Code, Section 2827(h)(4)(A).

customer seeking NSC payments for the renewable attributes of its generation must certify it owns the RECs associated with its generating facility.”² In addition, the PD states that “RECs are the appropriate measure of a generator’s renewable attributes and we believe that it is appropriate to compensate NEM customers for RECs conveyed to the utility with excess generation, *separate from the compensation for their electricity.*”³ These passages clearly imply that customers that cannot certify that they own the RECs associated with their generating facility should receive compensation, albeit not for their renewable attributes. The City recommends that the Commission make this explicit in the decision. Consistent with the above clarification, the Commission should also clarify that the appropriate compensation for surplus generation in the case where the customer does not provide the RECs to the purchasing utility is the “value of the electricity” as outlined in Section 5 of the PD.

The City also believes that the Commission should clarify that customers that provide surplus compensation to the utilities should be compensated for the “value of the electricity” even if a RECs market does not exist. This appears to be consistent with the intent of the PD. For example, the PD states that “the NEM customer should not be compensated for the renewable attributes of electricity in the form of RECs until such time as they actually create RECs and make them available to the utility,”⁴ thus implying that the NEM customer will be paid for the excess electricity in the interim.

The City believes that it would not make sense to delay compensation for the “value of the electricity itself” until such time as the REC market is operating, given the considerable obstacles and certain delays noted in the PD. For example, the PD noted

² Proposed Decision of ALJ Duda, November 3, 2010, p. 44. (Emphasis added.)

³ Proposed Decision of ALJ Duda, November 3, 2010, p. 46. (Emphasis added.)

⁴ Proposed Decision of ALJ Duda, November 3, 2010, p. 43.

that “At this time, almost no customer-side DG is RPS-eligible, except DG systems under AB 1969 tariffs,[] and it is unclear whether systems on net metering tariffs have meters that comply with WREGIS accuracy requirements” and “most current installations are not in fact RPS-eligible because they have not been certified by the CEC and cannot be certified until the CEC revises its *RPS Eligibility Guidebook*.”⁵ Furthermore, the PD states that “It is unclear whether WREGIS systems can track and otherwise account for RECs that would be split between the utility and the customer in such a fashion. In addition, RECs for RPS compliance are accounted for in 1 megawatt-hour (MWh) increments and it is unclear if the utilities or another entity may aggregate the net surplus generation of multiple small NEM customers to create RECs in the appropriate 1 MWh increments.”⁶ Given that it is unclear if and when these administrative obstacles associated with RECs can be cleared, the Commission should authorize the utilities to pay the NEM customers for the “value of the electricity itself” in the interim, or risk ensuring that the time and energy devoted to this issue and decision are effectively moot. Furthermore, this interpretation is consistent with the legislation, which does not *require* REC ownership to obtain compensation.

III. The Commission Should Revise the Applicable Hours to the Hours that NEM Customers Provide Excess Energy to the Utilities

The PD adopted PG&E’s proposal to use the simple average of the prices at the default load aggregation point (DLAP) “between the hours of 7 a.m. and 5 p.m., or the hours of daylight when NEM customers generally produce power, over the 12-month

⁵ Proposed Decision of ALJ Duda, November 3, 2010, pp. 39-40.

⁶ Proposed Decision of ALJ Duda, November 3, 2010, p. 42.

true-up period.”⁷ The PD concludes that “We agree with PG&E that these hours reasonably correspond to the hours that most NEM customers-generators produce power.”⁸ The basis of PG&E’s proposal is a footnote, which states, “The range of hours is an approximation, over a year, of hours with daylight.”⁹

The PD errs in making this conclusion. For example, in San Francisco, on December 21, 2010, the shortest day of the year, sunrise is at 7:21 a.m. and sunset is 4:54 p.m., making it mathematically impossible that 7 a.m. and 5 p.m. approximates the hours of daylight over the year. More importantly, NEM customers inject energy into the system at times when the gross output from their generating system exceeds the onsite load. Thus, it is very unlikely that a NEM customer would inject any energy into the system during the early morning or late afternoon hours of the day. Instead, these customers would inject energy into the system during the mid-morning to mid-afternoon hours. The City recommends that if the Commission adopts the use of the DLAP prices for determining the “value of the electricity” under the NSCR program then the Commission should modify the hours over which the averaging occurs to the hour ending 10 a.m. to the hour ending 5 p.m. This appears to be consistent with the intent of the PD, which indicated that prices should be based on the hours “that most NEM customer-generators produce power.”¹⁰

⁷ Proposed Decision of ALJ Duda, November 3, 2010, p. 15.

⁸ Proposed Decision of ALJ Duda, November 3, 2010, p. 28.

⁹ Application of Pacific Gas and Electric Company (U 39 E) to Implement Assembly Bill 920 (2009) Setting Terms and Conditions for Compensation for Excess Energy Deliveries by Net Metered Customers, March 15, 2010, p. 4, fn. 2.

¹⁰ Proposed Decision of ALJ Duda, November 3, 2010, p. 28.

If the Commission does not choose to make this modification to the PD, then it should, at the very least, adopt the hours of 7 a.m. to 7 p.m., which are the approximate sunrise and sunset times on the fall and spring equinoxes.

IV. The Commission Has Wide Latitude to Determine the Appropriate Avoided Cost Rates

In its recent decision, the Federal Energy Regulatory Commission (FERC)¹¹ found that the “concept of a multi-tiered avoided cost rate structure can be consistent with the avoided cost rate requirements set forth in PURPA and our regulations”¹² and that “permitting states to set a utility’s avoided costs based on all sources able to sell to that utility means that where a state requires a utility to procure a certain percentage of energy from generators with certain characteristics, generators with those characteristics constitute the sources that are relevant to the determination of the utility’s avoided cost for that procurement requirement.”¹³ Accordingly, the City urges the Commission to consider using an avoided cost measure that takes into consideration the fact that the excess energy from NEM facilities avoids energy from other renewable resources, given the state’s renewable procurement requirements. Taking this approach would ensure that this decision is consistent with previous Commission decisions (e.g., D.09-12-042) and promotes the California Legislature’s effort to encourage use of renewable power in the state.

V. Conclusion

¹¹ 133 FERC ¶ 61,059, Order Granting Clarification and Dismissing Rehearing (Issued October 21, 2010), Docket No. EL10-64-001, and Docket No. EL10-66-001.

¹² 133 FERC ¶ 61,059, para. 26.

¹³ 133 FERC ¶ 61,059, para. 29.

The City appreciates the PD's effort to implement a NSCR pursuant to AB 920. With respect to eligibility, the City requests that the Commission require the utilities to pay the NEM customers for the "value of the electricity itself" in those cases where the customer either does not own the REC or chooses not certify the REC because it may be effectively impossible or administratively burdensome to comply. The City also recommends that if the Commission adopts PG&E's proposal that it revise the applicable hours to correspond to the hours in which NEM customers inject energy into the system (i.e., hour ending 10 a.m. through hour ending 5 p.m.) or, at the very least, to the approximate hours of daylight (from hour ending 7 a.m. through hour ending 7 p.m.) Finally, the Commission has wide latitude to determine the appropriate avoided cost rates and, thus, the City urges the Commission to adopt a rate that is consistent with previous Commission decisions and with efforts of the California Legislature to promote renewable power.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **COMMENTS OF THE CITY OF SAN DIEGO ON THE PROPOSED DECISION OF ADMINISTRATIVE LAW JUDGE DOROTHY DUDA** on all parties of record in proceedings A.10-03-001, A.10-03-010, A.10-03-012, A.10-03-013, and A.10-03-017 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 this November 23, 2010, in Oakland, California.

/s/

ELAINE CHIODI



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