

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



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

Rulemaking 10-05-006
(Filed May 6, 2010)

**MOTION OF THE INDEPENDENT ENERGY PRODUCERS
ASSOCIATION FOR RECONSIDERATION OF THE SCHEDULE
FOR THIS PROCEEDING**

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Date: January 26, 2011

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In accordance with Rule 11.1 of the Commission’s Rules of Practice and Procedure, the Independent Energy Producers Association (IEP) submits its motion requesting reconsideration of the schedule proposed for this proceeding in the *Assigned Commissioner and Administrative Law Judge’s Joint Scoping Memo and Ruling* (Scoping Memo), issued on December 3, 2010.

The schedule for Track II of this proceeding was revised by the *Assigned Commissioner’s and Administrative Law Judge’s Scoping Memo for Track II Bundled Procurement Plans*, issued on January 13, 2011. IEP’s motion does not directly address or proposed to affect the schedule for Track II. Instead, this motion addresses the schedule and sequencing of the issues falling into Tracks I and III of this proceeding.

Track I is designed to “consider issues related to the overall long-term need for new system and local reliability resources, including adoption of ‘system’ resource plans for

each of the three utilities' service area[s].”¹ Track I includes consideration of the challenges of maintaining system reliability while integrating a greater proportion of renewable resources into the grid, replacing capacity retired or reduced due to Once-Through Cooling (OTC) regulations, maintaining local reliability, and meeting greenhouse gas (GHG) emissions reductions goals. To date, Track I has confronted competing models, sophisticated and time-consuming model runs, and consideration of a host of input assumptions, among many other issues.

Track III includes policy issues that went unaddressed in the last long-term procurement plan (LTPP) proceeding. Track III includes important issues like consideration of refinements to the bid evaluation criteria employed by the utilities (and in particular the evaluation and comparison of utility-owned generation projects and projects sponsored by independent power producers) and procurement necessitated by OTC regulations.

In light of the revision to the schedule for Track II issues and the apparent delay in key modeling work necessary for completion of Track I issues, it is timely to reconsider the schedule for this proceeding, with the goal of commencing the consideration of Track III issues during the First Quarter of 2011, rather than in Spring 2011 as is currently scheduled. In addition, regardless of which modeling approach is applied to model renewables integration, the LTPP modeling and analysis should incorporate a full range of plausible economic and resource outcomes, and the Commission should modify the schedule as required to enable this modeling to be completed. Each of these matters is discussed more thoroughly below.

I. THE TRACK I ANALYSES SHOULD BE THOROUGH AND COMPREHENSIVE

Even in less challenging circumstances, the analyses that inform Track I need to be thorough and comprehensive. Track I serves the important purpose of determining whether

¹ Scoping Memo, p. 3.

new resources are needed over the 10-year planning horizon to maintain the grid's reliability. If the resulting resource plan overestimates need, too many resources will be procured, at an unnecessary cost to ratepayers. If the plan underestimates need, the state could be caught short when demand increases, and the reliable operation of the grid could be jeopardized.

The normal challenges associated with Track I are exacerbated in this proceeding by the need to consider a number of legal and policy requirements:

- meeting the state's GHG emissions reductions goals will require significant reliance on renewable energy resources. The California Air Resources Board has established a Renewable Energy Standard (RES) requiring 33% of the state's energy use to be provided from renewable sources by 2020.
- achieving a 33% RES goal (or a corresponding increase in the statutory Renewable Portfolio Standard) by 2020 could require additional resources (beyond those needed to meet the planning reserve margin) and new products to support the integration of higher levels of renewable resources, particularly intermittent resources.
- retirements due to OTC regulations will eliminate significant amounts of flexible generating capacity in load centers and in constrained local areas that would otherwise be available to help in the integration of renewable resources.

In addition, the economic downturn has presented a forecasting challenge. While recent trends have been incorporated into lowered demand forecasts, history shows that demand can increase rapidly when the state recovers from a recession. The Track I resource plans should incorporate a degree of flexibility and nimbleness well beyond what is required in more stable times.

For all these reasons, it is critical for the Track I analyses to be thorough and comprehensive. Building a solid Track I resource plan may require more extensive modeling, scenario analysis, and sensitivity testing than in previous LTPP proceedings to account for greater uncertainty about future load and resources.

Up to now, two models have been offered to perform the Track I analyses. Although the Renewable Integration Model (RIM) proposed by Pacific Gas and Electric Company (PG&E) is simple and can complete model runs quickly, a recent evaluation of the competing models by Lawrence Berkeley National Laboratory and the National Renewable Energy Laboratory has noted some significant problems with the RIM. The other modeling approach, the PLEXOS production simulation model used by the California Independent System Operator (CAISO) to perform its Step 2 analyses, is complicated and takes a significant amount of time to develop, test, and produce robust results. According to Appendix A attached to the Administrative Law Judge's Ruling of December 23, 2010, the CAISO can complete only one to three scenarios by March 2011.

The Scoping Memo requires the utilities to evaluate multiple scenarios and sensitivities for Track I, and the Energy Division has proposed nine "priority" sensitivities. Due to the complications of the PLEXOS model and the length of time and level of resources required to complete each scenario analysis, the CAISO will complete only a subset of the defined scenarios and sensitivities by June 2011, the time Track I testimony is due under the current schedule. A complete Track I analysis, however, should frame the full range of outcomes, including the scenario in which the state's preferred policy outcomes fail to materialize; it is this scenario, not the preferred policy outcome, that will provide the greatest strain on the electric system and that will present the greatest planning challenges.

To provide a complete frame for a fully informed consideration of the Track I issues, the CAISO should also run a scenario that assumes that the state's preferred policy outcomes are **not** achieved, *i.e.*, a scenario characterized by low levels of demand-side reductions. Assuming that the state's policy goals will be achieved could lead to later surprises that the resource planning process should strive to avoid. In that context, IEP notes that the California Energy Commission's Staff recently found a significant discrepancy between *reported* energy efficiency savings and *verified* savings:

[M]easurement and verification studies completed on 2006–2008 programs found that *verified* efficiency program savings were substantially less than *reported*. The investor-owned utilities reported achieving 151 percent of their net energy savings goals during 2006-2008; however, the evaluation report indicated that the utilities achieved only 62 percent of their goals for that period.²

In light of this discrepancy, the Track I analysis should not assume optimistic levels of demand-side reductions; rather, the effect of lower levels of demand-side reductions should be tested through an additional scenario that also incorporates existing assumptions for the High Load scenario.

II. THE SCHEDULE FOR THIS PROCEEDING SHOULD BE MODIFIED

According to statements made by CAISO representatives at the prehearing conference, completing four of the seven target scenario analyses is expected to take until June. Analyzing the additional scenarios, including the high load, low demand-side reduction scenario proposed above, would require additional time. Delay is rarely desirable, but in this proceeding, the time required to perform the thorough analyses to inform the development of the Track I resource plan creates a unique opportunity to accelerate the consideration and resolution of other

² *Achieving Cost-Effective Energy Efficiency for California: 2009 AB 2021 Progress Report*, p. 1, available at <http://www.energy.ca.gov/2010publications/CEC-200-2010-006/CEC-200-2010-006.PDF>.

issues. Moreover, the depressed level of current demand and the recent addition of new generation resources,³ make it unlikely that the Commission will find it necessary in the very near future to authorize new generating resources that are the focus of the Track I. In other words, a delay in the completion of Track I, particularly a delay that is required to perform a complete scenario analysis, is unlikely to have any significant near-term effect on system reliability.

At the same time, the time required to perform a thorough analysis of the Track I opens up an opportunity to focus on Track III issues. Track III includes policy issues that went unaddressed in the last LTPP proceeding. The schedule outlined in the Scoping Memo vaguely assigns the consideration of Track III issues to “Spring 2011” (which extends into June), with a proposed decision slotted for “Fall 2011” (which extends into December). The vague schedule for Track III and the recent commitment in the Track II Scoping Memo to concentrate on Track II issues during the first half of 2011 raises the specter that Track III policy issues will again be shunted aside and possibly pushed over into the next LTPP proceeding.

Some of the key Track III issues are central to implementation of the Commission’s hybrid market structure, and thus resolving these issues is not a theoretical exercise to be completed at the Commission’s leisure. The Track III issues include refinements to bid evaluation in competitive solicitations, particularly with regard to bids for utility-owned generation (UOG), and procurement rules to comply with OTC policies. The need for refinements to bid evaluation and in particular the evaluation of UOG projects has already confronted the Commission in several contexts. In the proceeding on the results of PG&E’s

³ According to a database maintained by the California Energy Commission, 3359 MW of new thermal generating resources began operating in 2009 and 2010, in addition to new renewable resources not tracked in this database.

2008 long-term request for offers (A.09-09-021), for example, some parties with access to confidential information concluded that the benefits attributed to a turnkey proposal (*i.e.*, a project that would become a UOG plant at the completion of construction) were highly uncertain and were concentrated in the later years of the plant's assumed 30-year useful life, which distorted the comparison to 10-year Power Purchase Agreements for projects sponsored by independent power producers.⁴ If the Commission had already considered the comparison methodology issues, the resulting refined bid evaluation methodology would have allowed the Commission and the parties in A.09-09-021 to perform a fairer and more transparent comparison of the two structures.

Similarly, the issues related to the procurement necessitated by OTC regulations are already before the Commission. OTC plants (*e.g.*, South Bay, Contra Costa Units 6 & 7) are already shut down or in the process of retiring, and ensuring that the grid can be operated reliably in their absence is an issue in this proceeding that will affect both Track I and Track II.

For these reasons, the Commission should take advantage of the need to extend the schedule for Track I to complete the modeling required for a comprehensive assessment of system resource needs and should accelerate the consideration of Track III issues. IEP respectfully asks the Commission to revise the schedule for this proceeding and to commence Track III as soon as possible in the First Quarter of 2011 and not to wait until Spring, as the schedule currently provides. Similarly, the schedule for the issuance of the proposed decision on at least the most critical Track III issues—refinement of the bid evaluation methodology and

⁴ See, *e.g.*, *Concurrent Opening Brief of The Utility Reform Network*, A.09-09-021, April 14, 2010, p. 14.

procurement necessitated by OTC regulations—should be moved up from the Fall 2011 set forth in the Scoping Memo, to no later than the Third Quarter of 2011.

Respectfully submitted this 26th day of January, 2011 at San Francisco,
California.

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CERTIFICATE OF SERVICE

I, Melinda LaJaunie, certify that I have on this 26th day of January 2011 caused a copy of the foregoing

**MOTION OF THE OF THE INDEPENDENT ENERGY
PRODUCERS ASSOCIATION FOR RECONSIDERATION
OF THE SCHEDULE FOR THE PROCEEDING**

to be served on all known parties to R.10-05-006 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 26th day of January 2011 at San Francisco, California.

/s/ Melinda LaJaunie
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