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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)

**ASSIGNED COMMISSIONER AND ADMINISTRATIVE LAW JUDGE'S
JOINT SCOPING MEMO AND RULING**

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**ASSIGNED COMMISSIONER AND ADMINISTRATIVE LAW JUDGE'S
JOINT SCOPING MEMO AND RULING**

1. Overview

This scoping memo and ruling, which follows a prehearing conference held on June 12, 2010, affirms the preliminary categorization of this proceeding as “ratesetting,” sets forth the scope and procedural schedule for the proceeding, including evidentiary hearings, pursuant to the requirements of Section 1701.1,¹ and assigns Administrative Law Judge Victoria S. Kolakowski and Peter V. Allen as the presiding officers. It also addresses discovery, service, and other procedural issues for the proceeding. Parties can appeal this ruling only as to the category of this proceeding under the procedures in Rule 7.6.²

2. Background

This long-term procurement proceeding (LTPP) was initiated by an Order Instituting Rulemaking (OIR) to continue the Commission’s efforts to ensure a reliable and cost-effective electricity supply in California through integration and refinement of a comprehensive set of procurement policies, practices and procedures underlying long-term procurement plans, and to provide the appropriate forum in to consider the Commission’s electric resource procurement policies and programs and how to implement them.³

¹ Unless otherwise stated, all section references are to the California Public Utilities Code.

² Unless otherwise stated, all references to a “Rule” or to “Rules” are to the Commission’s Rules of Practice and Procedure.

³ This is the successor proceeding to Rulemaking (R.) 08-02-007, R.06-02-013, R.04-04-003, and R.01-10-024, the rulemakings initiated by the Commission to ensure

Footnote continued on next page

The OIR established a multi-track proceeding separately addressing several issues.

In Track I, we shall consider issues related to the overall long-term need for new system and local reliability resources, including adoption of “system” resource plans⁴ for each of the three utilities’ service area that will inform the next available cycle of bundled procurement plans. These resource plans will allow the Commission to comprehensively consider the impacts of state energy policies on the need for new resources.

In Track II, we shall consider adoption of “bundled” procurement plans⁵ pursuant to AB 57 (Stats. 202, ch. 83, Sec. 3) (codified as Pub. Util. Code § 454.5) for the three major electric IOUs, i.e., Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE) to authorize their procurement needs for their bundled customers.

In Track III, we shall also consider a number of rule and policy issues related to procurement plans. Track III will be split into two phases. Phase 1

that California’s major investor-owned utilities (IOUs) could resume and maintain procurement responsibilities on behalf of their customers.

⁴ We define “system” as pertaining to the loads and resources in each IOU’s service area. “Service area” generally corresponds to the IOUs’ respective distribution service territories, inclusive of bundled, direct access, and community choice aggregator loads, but exclusive of embedded publicly-owned utility loads. To distinguish filings related to system reliability needs from bundled Assembly Bill (AB) 57 procurement plans, we will refer to these as “resource plans.”

⁵ We define “bundled” as pertaining to an IOU’s load and resources in its role as a Load Serving Entity (LSE). To distinguish filings related to bundled AB 57 obligations from separate filings related to system reliability needs (e.g., the resource plans), we will refer to these as “procurement plans.”

covers issues requiring immediate resolution and includes convergence bidding and amendments to the Cost Allocation Mechanism. Phase 2 will consist of all other matters detailed in the Track III discussion below.

While the three tracks shall be conducted concurrently, any interim decisions and rulings from one track may inform future activities in the other tracks as described below.

All resource and procurement planning in this proceeding will be done in the context of the Energy Action Plan II (EAP II)⁶ and other state energy policies.

The OIR includes a preliminary scoping memo which identified issues that are in the scope of this proceeding, as well as some issues which are not within the scope of this proceeding.⁷ Any issue identified in the preliminary scoping memo as being within the scope of this proceeding is affirmed herein to the extent that this Scoping Memo does not clearly modify or supersede its provisions, and any issue identified in the preliminary scoping memo as being outside the scope of this proceeding is excluded unless specifically noted herein.

3. Scope of the Proceeding

3.1. Track I

As noted in the OIR, the purpose of the "system" planning track, Track I, is to identify California Public Utilities Code (CPUC)-jurisdictional needs for

⁶ Energy Action Plan I (EAP I) was issued jointly on May 8, 2003, by the Commission, the California Energy Commission (CEC) and the California Consumer Power and Conservation Financing Authority. EAP I was updated with the adoption of EAP II, as a joint policy plan of the Commission and the CEC, in October 2005. See www.energy.ca.gov/energy_action_plan/2005-09-21_EAP2_FINAL.PDF.

⁷ OIR at 11-19.

new resources to meet system or local resource adequacy over the 2011-2020 planning horizon, including issues related to long-term renewables planning and need for replacement generation infrastructure to eliminate reliance on power plants using Once Through Cooling (OTC). In addition to maintaining an adequate reserve margin, we anticipate that system requirements to: 1) integrate renewables; 2) support OTC policy implementation; 3) maintain local reliability; and 4) meet greenhouse gas (GHG) goals will be primary drivers for any need for new resources identified in this proceeding. Furthermore, we may address or reassess the Energy Efficiency (EE) and Demand Response (DR) assumptions utilized in determining future need.⁸

Finally, the Commission will need comprehensive information on which to base resource policy choices applicable to all jurisdictional LSEs. While 33% renewables portfolio standards (RPS) implementation scenarios will likely be a central focus of this proceeding, additional information may be required to assess other cost-effective strategies to achieve GHG goals, including considering GHG adders, transmission, distributed generation, and OTC may also be considered.

3.1.1. General Process for Developing System Resource Plans

Administrative Law Judge (ALJ) Victoria S. Kolakowski issued a ruling on May 28, 2010 (May 28 Ruling) setting forth the initial schedule and process for

⁸ We will not consider new EE goals in this proceeding. However, we may review the energy efficiency planning assumptions adopted in Decision (D.) 08-07-047 for procurement purposes. Additionally, we may consider any new information about EE projections after parties file proposals in response to a subsequent ruling served in both this proceeding and R.09-11-014.

discussing the various elements of Track I. The May 28 Ruling announced that system resource plans⁹ would be developed based upon plans generated by the IOUs based upon a variety of scenarios¹⁰ to be described in this Scoping Memo. IOUs and other parties may prepare alternative proposed resource plans or other analyses relevant to developing such plans. More specifically, the May 28 Ruling stated:

- Required renewable portfolios shall be initially proposed by Energy Division staff (Staff).
- Required non-renewable inputs shall be initially proposed by the IOUs (or any party, in the case of energy efficiency inputs).
- Any party or respondent may comment on any proposal and make any alternative proposal; Staff may, however, establish guiding principles for alternative proposals.
- Following this series of Staff, IOU and party proposals, the Scoping Memo shall establish standardized planning assumptions for the system resource plans conducted by the IOUs, consistent with the direction in the OIR.
- The IOUs shall complete and file system resource plans that fulfill the standardized planning assumptions set forth in the Scoping Memo.

⁹ Resource Plan: A filing before the Commission containing information and analysis on all portfolios developed and evaluated, including complete documentation of each portfolio's performance under required evaluation criteria.

¹⁰ Scenario: A possible future state of the world encompassing assumptions about policy requirements, market realities and resource development choices.

- In filed testimony, the IOUs or any other party or respondent may submit supplemental analyses based on alternative assumptions.¹¹

The required standardized planning assumptions to be used in developing the studied system resource plans were released in three separate parts, each of which was the subject of a separate workshop and round of comments and reply comments. We have reviewed these comments, and standardized planning assumptions are contained in Attachments 1 and 2 to this ruling and are discussed in further detail below.

Ultimately, the purpose of these required scenarios is to model potential outcomes of a wide variety of policy choices using common assumptions to allow plans developed by each IOU to be compared together. While not exhaustive, Staff intends these scenarios to represent a wide practical range of potential resource futures. Absent such pre-established assumptions, each IOU would likely develop proposals for their service territory based upon incompatible assumptions which could not be readily compared and combined to create a meaningful overall system resource plan.

The appropriate use for these system resource plans is within the scope of this proceeding, and has been the source of comment by parties. We shall not seek definitive resolution of these questions in this Scoping Memo. However, the system plans utilized in this proceeding may be utilized or modified in other proceedings as deemed appropriate by the ALJ or assigned Commissioner's office for the proceeding in question.

¹¹ May 28 Ruling at 5-6.

To the extent that such questions arise regarding specific elements of the system resource plans, they are discussed in further detail below.

3.1.2. Standardized Planning Assumptions (Part 1)

The first part of the Resource Planning Assumptions was released with the May 28 Ruling. It sought to establish a number of common value¹² assumptions and definitions, including: evaluation criteria related to cost, risk and GHG emissions; base case assumptions for each scenario including load and resource (L&R) variables and cost variables as well as standardized L&R tables.

Additionally, it recommended requiring sensitivity analysis regarding natural gas prices; carbon dioxide (CO₂) prices; need levels; and technology costs. The Planning Standards attachments to the May 28 Ruling have been revised and are attached hereto as Attachment 1 - Standardized Planning Assumptions (Part 1).

3.1.2.1. Evaluation Criteria

3.1.2.1.1. Cost

Some parties, including Cogeneration Association of California (CAC), Energy Producers and Users Coalition (EPUC), PG&E, and SDG&E,¹³ commented that cost calculations for a wide range of renewable scenarios are too difficult and time consuming to model in production simulations in the LTPP proceeding. The Commission's procurement policies are not envisioned to

¹² Common value: A set of input assumptions and parameters that represent the expected or most likely values for each scenario. All required scenarios shall have the same common value assumptions, whereas supplemental scenarios may consider alternative assumptions.

¹³ CAC June 21st Comments at 5-6; EPUC June 21st Comments at 5-6; PG&E June 11th Comments at 5; and SDG&E June 21st Comments at 8.

include an exhaustive list of possible scenarios. The required scenarios described in this scoping memo have been selected to narrow the cost modeling burden on parties in this proceeding.

3.1.2.1.2. Risk

Risk analysis in the context of the LTPP proceeding raises issues related to the efficacy of Time to Expiration for the Value at Risk (TEVaR) over a 10 year horizon. In comments both SDG&E and PG&E opposed the utilization of TEVaR, while Jan Reid proposed utilities risk management plans must change over time with the “dynamics of both energy markets and risk management practices.” (June 4th 2010, 1-2.) In opposing Reid’s position, SDG&E argues “Track I addresses risk by examining multiple scenarios and sensitivities” (June 25th 2010, 6) and should not utilize TEVaR to otherwise measure long term risk exposure. SDG&E is correct that relative risks can be examined by comparing and contrasting multiple scenarios and sensitivities, but TEVaR remains the leading, although not the only, metric for measuring risk in IOU positions in the LTPP proceeding. In light of these concerns, the Commission will give each metric, including TEVaR, its appropriate weight in its assessment of risk.

3.1.2.1.3. GHG Emissions

See Section 3.A.2b.3 below for discussion of all GHG issues.

3.1.2.1.4. Other Potential Criteria

Natural Resources Defense Council (NRDC) and Union of Concerned Scientists (UCS) argue in comments¹⁴ that the proposed GHG metrics capture

¹⁴ NRDC and UCS June 21st Comments at 4.

many of the state's objectives, but do not capture all of them. NRDC and UCS suggests that an environmental impact assessment (EIA) be an additional required portfolio metric. The EIA would measure the environmental impacts of different procurement portfolios based on criteria determined by the Commission.

The scenarios required herein are built upon indicative portfolios, and meet the state's environmental goals, such as the RPS, and OTC retirements. Given that, along with the nature of the process at issue here, and the uncertainty about what will ultimately be built, it is unnecessary and premature to attempt the detailed level of analysis suggested by NRDC and UCS.

3.1.2.2. Common Assumptions

3.1.2.2.1. Loads & Resources

The L&R tables are designed to provide guidance on the forecast of system demand and supply between 2011 and 2020. The assumptions underlying these tables are based upon numerous publicly available data sources, including the demand forecast, taken from the CEC, forecasts of demand-side programs, and forecasted retirements and additions.

3.1.2.2.1.1. Physical Location of Generation

Since the IOUs are not directed to create a single, system-wide plan, allocation of resources by their physical location is the easiest way to deal with the individual footprint. Existing, planned, and retiring generation will be allocated to North of Path 26 (NP26), South of Path 26 (SP26), or San Diego based on its physical location, regardless of the contracting entity. This allocation is derived from the physical siting location of units in the system in Track I, rather

than the contractual obligations of units. Contractual obligations are considered in the bundled plans.

The impacts of dividing all resources by their physical path location will greatly alter the landscape of RPS-eligible resource capacity. For example, RPS-eligible resources are location-dependent, which means most of the capacity value from a given scenario might be assigned to SP26. Similarly, RPS-tagged imports from outside of California Independent System Operator Corporation (CAISO) service area will also be associated with either NP26 or SP26.

By comparison, the allocation of RPS-eligible resources from a contractual, or bundled, perspective will see much more equal distribution since the ability to contract (within Commission and State rules and policy) is much more flexible than physically siting the resources themselves.

3.1.2.2.1.2. Net Interchange

Net Interchange represents the firm amount of capacity in megawatts (MW) that is expected to be delivered into a particular service territory or balancing authority net of exports and taking into account path limits on transmission lines. For the System Resource Plans, the Net Interchange for each service territory will be established from the sum of two values. These values are derived from a physical perspective of the system, and not a contractual perspective. It is expected that the results presented for the PG&E, SCE, and SDG&E service areas will differ from the contractual plans presented in Track II due to the different types of analyses performed in the different tracks.

**3.1.2.2.1.2.1. Imports/Exports from
Outside the CAISO Control
Area**

The Maximum Import Capability will be determined by summing import capability of intertie lines into the CAISO control area that deliver into PG&E's service territory, SCE's service territory, or SDG&E's service territory based on the transmission resource's Maximum Available Import Capability for purposes of the Import Allocation process.¹⁵

**3.1.2.2.1.2.2. Net Interchange of In-State
Resources Across Paths**

The net transfer of resources on peak across Paths between IOU service areas is recommended to be considered as part of any eventual final decision outcome, and will be included in the calculation of the residual net short or long in the service areas. In light of the physical look, we must address differences in location of physical resources or we are implicitly adopting a cross-subsidy between IOU ratepayers. To address this issue, we adopt a mechanism that calculates transfers across the path based on excess resources being transferred to areas with too few resources. As part of this calculation, there is the presumption that there are no exports across the Paths from a capacity-scarce service area during the time of that service area's peak.

Transfers across the path will be calculated based on excess existing resources in a capacity-rich side of the path¹⁶ to the capacity-scarce side¹⁷ of the

¹⁵ Maximum Import Capability posted to the Commission website here: <http://www.caiso.com/27c6/27c675b81c230.pdf>.

¹⁶ Greater than 117% of the demand forecast.

path. This calculation would be capped in one of three cases. First, is when the maximum resource adequacy (RA) value of the Path's transmission capacity rating at peak is reached. Second, is when the transfers reduce the capacity-rich side of the path's residual net long position to 117% of the demand forecast. Third, is when the capacity-scare side of the path's residual net short position meets the Planning Reserve Margin (PRM) of 115%.

3.1.2.2.2. Prices

3.1.2.2.2.1. Natural Gas

The 2009 Market Price Referent (MPR) model incorporates the 22-day (22 trading days for one month from July 27, 2009 to August 25, 2009) average of New York Mercantile Exchange (NYMEX) closing prices for year 2010 to 2021. PG&E raises the issue during the Planning Standard Part 1 workshop and via its written comments that the MPR model should be updated with more recent quote dates.¹⁸ We agree that the NYMEX gas price inputs should be updated to capture the most up-to-date gas futures. Therefore, the IOUs should utilize the 2009 MPR gas price methodology, with the NYMEX future price inputs based on the 22 trading day average over one month, from July 26, 2010 to August 24, 2010.

¹⁷ Less than 115% of the demand forecast.

¹⁸ PG&E June 21 Comments at 8.

3.1.2.2.2. CO₂

The IOUs shall use the latest MPR methodology to determine CO₂ prices, for the same time period as employed for the gas price.¹⁹

3.1.2.2.3. GHG-Related Issues

This proceeding has a number of GHG related issues which we will consider in this section.

3.1.2.2.3.1. Carbon Offset Prices

On October 28, 2010 the Air Resources Board (ARB) released a proposed mechanism to implement a cap and trade program with an expected vote on the proposal on December 2, 2010. Until ARB releases its final carbon regulations, the utilities shall assume that offsets will be valued at the same price of carbon allowances for each year. After ARB finalizes its offset policies, parties shall discuss with Staff how to revise the offset assumptions to more appropriate outcomes expected under regulations under AB 32, stats.2006, ch 488.

3.1.2.2.3.2. GHG Cost Containment

In its OIR comments, PG&E encouraged the Commission to include cost containment policies in its GHG assumptions. We agree that these assumptions are important; however, the ARB has not finalized what cost containment policies it will be using in its regulation. The ARB released a draft version of these policies on October 28, 2010. In accordance with that draft at this time we

¹⁹ The 2009 MPR model is available at:
http://www.cpuc.ca.gov/NR/rdonlyres/1406475F-6F1E-4A3F-85AF-6EA53419BA01/0/2009_MPR_Model.xls.

require the IOUs to base their analysis upon the carbon cost schedule provided in Attachment 1, Appendix B.

3.1.2.2.3.3. Allocation Policy Assumptions

In comments on the OIR, several parties²⁰ expressed an interest in receiving specific guidance from the Commission regarding assumptions that should be used for GHG allowance allocation policy. We recommend that portfolios be designed under the assumption that no allowances will be provided to utilities. The allocation policy will be determined by the ARB and included in their final draft carbon regulation. ARB has not provided any public announcements regarding specific electricity sector allocation proposals, but it has indicated an interest in auctioning some allowances and giving utilities some of the revenue from these sales to support their GHG-reduction efforts.

The ARB released its draft regulation October 28, 2010. Following the release of ARB's allowance allocation proposal, utilities should update their portfolios to reflect the value of the allowances or allowance revenue that they receive. The value of these allowances should be consistent with the allowance prices provided in this Scoping Memo.

In addition, IOUs should include in their portfolios information regarding how allowance allocation revenue will be used to support GHG mitigation efforts. As stated in the CPUC CEC Joint Recommendation to ARB on allowance

²⁰ PG&E June 11th Comments at 5; CAC June 25th Comments at 4-5; and EPUC June 25th Comments at 4-5.

allocation policy (R.04-06-009),²¹ the Commission expects that all allowance value will be used to support GHG mitigation efforts. Procurement portfolios should include specific documentation outlining how much allocation value is used for different mitigation efforts.

Because of the opportunity costs associated with any allocation, the amount of free allocation that each utility receives should not impact the carbon cost of its procurement decisions. This is because the GHG costs associated with procurement will relate to the carbon cost passed on by generators and the carbon costs associated with utility-owned generation. The primary drivers of these costs are the allowance price and the procurement method. Neither of these factors is influenced by the allocation of allowances – whether allowances are allocated by auction or freely distributed. The price of allowances is determined by supply and demand for allowances, which is not affected by the allowance allocation schemes being considered by ARB.²²

²¹ Interim Opinion on GHG Regulatory Strategies available at: <http://docs.cpuc.ca.gov/efile/PD/78643.pdf>.

²² As discussed in the Commission Staff paper on allowance allocation in the electricity sector, an output-based allocation could impact the price of allowances, but only in the case that it was used for a significant portion of total allowances and used over a long period of time. We do not anticipate that ARB will use this approach to allowance allocation in the electricity sector. Available at: [http://www.climatechange.ca.gov/eaac/documents/state_reports/CPUC-CEC Staff Paper on Allocation.pdf](http://www.climatechange.ca.gov/eaac/documents/state_reports/CPUC-CEC_Staff_Paper_on_Allocation.pdf).

3.1.2.2.3.4. Allocation of GHG Emissions from Combined Heat and Power Facilities

While it is difficult to determine a precise system average heat rate (HR) for combined heat and power (CHP) expected to come online in the next decade, the CEC's CHP Market Assessment²³ provides some guidance. This report assesses the technical potential for CHP in the State and compares this capacity with various market scenarios. The sum of these market scenarios, or the "All-In" case in the report, includes a mix of large and small CHP providing on-site and exported electricity. The weighted average HR for CHP systems in the All-In case is 8,893 British thermal units (Btu) / kilowatt-hours (kWh) without line losses. (For supply-side resources, a line loss factor may be added to the HR to account for less efficient electricity delivered to the grid.)

We believe the weighted average HR provided in the CEC report's All-In market scenario represents an appropriate estimate for new CHP in the next decade. While the overall market penetration of CHP is higher in the All-In case than what is proposed in this proceeding, the characteristics of the market are reflective of we expect to see develop. That is, we expect a CHP build out roughly evenly split between new CHP above and below 20 MW, with exports to the grid dominated by large systems and a carbon payment that will stimulate the CHP market based on the social, environmental and economic benefits of emissions reductions provided by CHP-generated power that is more efficient than the displaced grid electricity.

²³ Combined Heat and Power Market Assessment is available at: <http://www.energy.ca.gov/2009publications/CEC-500-2009-094/CEC-500-2009-094-D.PDF>.

3.1.2.2.3.5. Time of Use and Seasonal Marginal Emissions

We recommend that IOUs develop their own assumptions regarding the emissions of the marginal generator during different time periods and seasons. These assumptions are used to calculate the carbon cost associated with sales of self-owned generation, market purchases from other LSEs, bilateral purchases from other LSEs, purchases from Qualifying Facilities (QFs) and market purchases from the CAISO market.

3.1.2.2.3.6. Average Emissions of the CAISO Market Pool

Staff recommends that the emissions associated with CAISO market pool purposes should reflect the average emissions of all of the CAISO market pool during a particular time period and season. However, we will not direct IOUs to use specific assumptions regarding average emissions from CAISO pool purposes. Instead, IOUs are encouraged to discuss their proposed assumptions with the Staff prior to submitting their portfolio results.

3.1.2.2.3.7. Allocation of GHG from CHP Facilities

IOUs and parties will follow the methodology in the Standardized Planning Assumptions (Part 1) for allocating the proportion of GHG emissions from CHP to the electric industry.

3.1.2.2.4. OTC and Non-OTC Retirements

We adopt a set of assumptions about OTC retirements. These assumptions are based upon the State Water Resource Control Board (SWRCB) adopted policy, with the following modifications: (i) certain OTC plants with permit restrictions or repowering agreements that would become active before the SWRCB adopted policy schedule are placed in earlier years, due to publicly

known arrangements; (iii) OTC in Los Angeles Basin remaining as of 2016 and slated to become compliant in 2020 was evenly spread over 2016 - 2019; (iii) several plants were assumed to not retire, such as the nuclear units and Moss Landing units 1 and 2. The 15 MW South Bay Gas Turbine is counted under OTC units retiring, although it itself is not an OTC unit.

As to non-OTC aging plants, this scoping memo directs use of the forecast retirements listed in the CAISO's OTC scenario analysis tool, under Category 10.

3.1.2.2.5. Demand Response

The common values used in the required scenarios should reflect the reasonable levels of DR resources that the Commission has authorized funding, directed in its DR policy decisions, and relied on the benefits for approving funding for other projects.

Specifically, the levels of DR assumed in the required scenarios shall reflect currently adopted 2009-2011 DR programs in D.09-08-027 and DR programs approved through other Commission proceedings. The Common Value should also include load impact from reasonably anticipated DR programs/resources such as those enabled by the IOUs' Advanced Metering Infrastructure (AMI) systems ("AMI Enabled DR"), of which the estimated benefits were included in the Commission approved AMI decisions.

The forecasted values shall include AMI-enabled DR, such as price-responsive programs adopted or directed by the Commission, but yet to be implemented,²⁴ and any default and optional dynamic rates expected in the forecast period. In addition, the forecasts should include the PTR program and

²⁴ These include, for example, PG&E's Peak Time Rebate (PTR).

the Programmable and Communicating Thermostat program underling the AMI related DR benefit assumptions in the Commission AMI decisions.²⁵

The estimated ex-ante load impact forecast filed in this proceeding shall be based on the April 1, 2010 Load Impact Report Compliance Filing pursuant to Ordering Paragraph (OP) 4, D.08-04-050. The utilities should report DR portfolio load impact forecast (2011-2020) for the 2010 LTPP using the August Monthly System Peak Load Day under a 1-in-2 Weather Condition.

Pursuant to the Commission orders in PG&E's and SCE's AMI decisions,²⁶ we anticipate that the IOUs would include the ex-ante load impact forecasts for the AMI Enabled DR in their April 1 Load Impact Reports (April filings). However, except for SDG&E, some of these programs have not been implemented; therefore, PG&E and SCE did not include any ex-ante forecast for these programs in their April 2010 filings. Neither PG&E nor SCE provided the information in their initial comments on the OIR neither in June 2010 nor in the supplemental comments in July 2010.

In absence of the IOU inputs, it is reasonable to rely on the load impact forecast adopted in the AMI decisions to develop the AMI Enabled DR values for this ruling. The common value also includes the ex-ante DR portfolio load impact forecast for other programs provided in the IOUs' April 2010 filings.

²⁵ D.09-03-026 (PG&E), D.08-09-039 (SCE), and D.07-04-043 (SDG&E).

²⁶ D.09-03-026, OP 10 and D.08-09-039, OP 3.

3.1.2.2.6. Local Need Requirements

A number of parties, from SCE to The Utility Reform Network (TURN),²⁷ indicated the importance of locally constrained areas. As such, we are requiring the IOUs to conduct a needs analysis for locally constrained areas. The needs analysis shall include a methodology for the most appropriate and cost effective ways to address the shortages. As part of this analysis, we expect that the IOUs will not use simple L&R spreadsheets, instead they shall use modeling techniques such as power flow analyses to demonstrate the results of their methodology.

These analyses shall be completed according to the schedule laid out herein and in subsequent ALJ rulings.

3.1.2.3. Sensitivities

3.1.2.3.1. Natural Gas

In the sensitivity analysis for natural gas prices, the IOUs shall use low and high natural gas prices of \$2 per million British thermal units (MMBtu) and \$10 per MMBtu respectively based on feasible extremes of long-term gas prices. These values are established based on the current status of the natural gas industry.

3.1.2.3.2. CO₂

In the sensitivity analysis for CO₂ prices, the IOUs shall use low and high carbon prices that reflect a 25% variance from the MPR value for each year.

²⁷ SCE June 11th Comments at 4-5; TURN June 25th Comments at 6; and WPTF June 4th Comments at 7.

3.1.2.3.3. Need

In the sensitivity analysis for demand levels for both gigawatt hour (GWh) and MW, the IOUs shall use high and low demand levels that reflect a 10% variance from the demand forecast value for each year. This value is reflective of any combination of future uncertainties (e.g., increased or decreased load growth or programmatic performance).

3.1.2.3.4. Technology Cost

Staff initially proposed consideration of a technology cost sensitivity. However, there are a number of distinct technologies used for different resources procured by IOUs. Because differences between technology costs adjustments can shift the resource allocation, use of distinct sensitivities for different technologies would be appropriate. This would require the use of numerous sensitivities, which would introduce complexities that would outweigh the benefits of the analysis. Additional discussion on photovoltaic costs is included later in this scoping memo. Therefore, we will not require use of a technology cost sensitivity in this proceeding.

3.1.2.4. Other Issues

3.1.2.4.1. CHP Assumptions

The common values regarding CHP were based on parties' comments. The Cogeneration Association of California (CAC) and the Energy Producers and Users Coalition (EPUC)²⁸ recommended that 4,596 MW of existing CHP should be retained by the IOUs. Additionally, CAC and EPUC recommended between 2,000 and 4,000 MW of new incremental CHP between now and 2020. SCE

²⁸ CAC June 11th Comments at 2 and EPUC June 4th Comments at 2.

replied,²⁹ amongst other comments related to CHP, that the Commission has a QF, not a CHP policy, and that existing capacities are required only through 2016.

The common values assumptions developed by Staff and adopted herein anticipates increases in CHP in IOU service territories at the midpoint between no incremental CHP and the IOUs' portion of the nearly 4,000 MW of incremental state-wide CHP that ARB targets in its AB 32 Scoping Plan. This assumption is an attempt to balance current state policy goals, including AB 32 and AB 1613, Stats. 2007, ch. 713³⁰(which fosters new, small and highly efficient CHP facilities) with reliability concerns that could result from under-procurement if these CHP goals are not fully achieved by 2020. We will re-evaluate our CHP adoption assumptions in future LTPP proceedings, after review of actual incremental CHP capacity adoption rates.

Additionally, we make several assumptions for CHP. First, existing CHP capacity will be maintained through 2020. Second, incremental CHP growth is evenly split between on-site use and exports to the grid. Third, the ratio of capacity between the IOUs' territories remains constant at the 2010 percentages for supply-side and demand-side CHP. Fourth, the 2020 values are evenly distributed back to 2010.

3.1.2.4.2. PRM

We are using existing assumptions regarding the PRM as adopted in D.04-01-050. R.08-04-012 was closed without altering the PRM.

²⁹ SCE June 25th Comments at 8-11.

³⁰ Codified as Cal. Pub. Util. Code §§ 2840 through 2845.

3.1.3. Standardized Planning Assumptions (Part 2 - Renewables)

The second part of the Planning Standards were issued in a ruling mailed June 22, 2010 (RPS Ruling) and related to RPS assumptions, including proposals for the four RPS portfolios/scenarios to be included in developing the required system resource plans.

3.1.3.1. Required Scenarios:

We require that the IOUs study four different RPS scenarios that achieve a 33% RPS by 2020, as well as a 20% by 2020 scenario. Additionally, two sensitivities around the 33% trajectory scenario with high and low load are required. Staff and its consultants, Energy and Environmental Economics, Inc. (E3) and Aspen Environmental Group, sized these portfolios based upon: the CEC's 2008 Net Systems Power Report, as updated by Staff records of newly online resources;³¹ the CEC's 2009 Integrated Energy Policy Report process for load forecasts;³² and modifications to the load forecasts based upon assumptions regarding demand-side programs.

Each portfolio includes a "discounted core" consisting of projects with signed power purchase agreements and filed applications for major permits. To fill the remaining gap between the "discounted core" and the total RPS need in 2020, staff and E3 considered renewable potential identified in: the Energy Division database of projects under contract and negotiation; the Renewable Energy Transmission Initiative's Phase 2B database; E3's GHG calculator; and

³¹ CEC, *2008 Net System Power Report*. CEC-200-2009-010.

³² CEC, *California Energy Demand 2010-2020, Adopted Forecast*. CEC-200-2009-012-CMF.

E3/Black & Veatch estimates of statewide distributed generation (DG) potential.³³ Cost, environmental concern, and time factors were assigned to resources,³⁴ and portfolios were developed by varying the weight given to these factors in the project ranking and portfolio selection process.

The following portfolios were developed:

- (1) Trajectory: Intended to model a future similar to the IOU's current contracting and procurement activities. It weights commercial rankings at 60% and costs and environment rankings at 20% each, giving no weight to the time factor. Three versions of the trajectory scenario will be studied: the first assuming high demand, the second assuming the common value demand and the third assuming low demand. These changes to demand are consistent with the need sensitivity, and the changes to both demand and additional required RPS-eligible resources are located in the corresponding L&R Table.
- (2) Time Constrained: Focuses on resources that can come online most quickly, weighting the time factor at 95% and the environmental factor at 5%. The environmental score is included as a tie-breaker, given the limited differentiation between the timing scores, which depend only upon first full year of commercial operation. The environmental criterion was chosen as the tie-breaker because of the impact that environmental concerns could have on a project's permitting and construction timelines.
- (3) Cost Constrained: Focuses on resources that are lowest cost, weighting the cost factor at 100%.

³³ RPS Ruling, Attachment 1 at 10-11.

³⁴ The weighting process is described in detail in the attached Standardized Planning Assumptions (Part 2 - Renewables).

- (4) Environmentally Constrained: Focuses on the resources that scored highest according to the environmental scoring methodology described in the attached Standardized Planning Assumptions (Part 2 - Renewables), weighting the environmental factor at 100%.

Parties commented on the definitions assigned and values calculated regarding each of the foregoing inputs into these four portfolios.

3.1.3.2. High DG

Pacific Environment, Sierra Club California, and California Energy Storage Alliance (CESA) request that the Commission specifically adopt a “High DG” scenario as one of the required scenarios for the 2010 plans. We decline to adopt such a scenario as required, for several reasons.

First, the Environmentally-Constrained Scenario is in fact already a “High DG,” though not “All DG,” scenario, as it includes over 9,000 MW of wholesale distributed photovoltaic (PV) – system-side projects each less than or equal to 20 MW. This represents an approximately 200-fold increase over the current installed capacity of these types of projects in California. In fact, through the inclusion in the discounted core of 1,052 MW of wholesale DG, all of the required scenarios assume a significant acceleration in the installation of small-scale wholesale PV, relative to past trends in California.

Second, we agree with the comments by parties that more information is needed regarding the feasibility of such high levels of PV penetration, from both a system impact and project development perspective. Parties offered little comment on the staff-proposed timing assumptions for the deployment of wholesale DG (Table 6 of the draft Long-Term Renewable Resource Planning Standards), and these assumptions drive the amount of PV that is selected in the

Environmentally-Constrained and Time-Constrained Scenarios, where cost has little impact on portfolio selection.

We thus agree with comments from parties including Sierra Club California, that work is needed to identify and address the barriers that today constrain DG deployment. The CPUC is developing the Renewable Distributed Energy Collaborative (Re-DEC) for this purpose, and we hope to soon have better information on development time-frames. We encourage parties interested in this issue to contribute to the Re-DEC's work as it develops.

Should any party believe that a scenario with higher levels of DG would in fact meet the guiding principle of "reasonably feasible," that party may submit the complete scenario and justification for consideration by all parties according to the schedule laid out in this Scoping Memo.

3.1.3.2.1. Storage

CESA, Green Power Institute (GPI), NRDC and UCS, and Pacific Environment commented on the need for a storage scenario, particularly in relation to renewables integration.³⁵ While energy storage can potentially provide grid services to help integrate renewables, it is not the only technology type that can do so. The IOUs should choose the most environmentally-sound and cost-effective resources for procuring to the level of identified need.

The Commission has already approved ratepayer funding for storage research and demonstration projects in a number of proceedings,³⁶ and is

³⁵ CESA July 9 2010 Comments at 2, GPI July 16 2010 Reply Comments at 1, NRDC and UCS July 9 2010 Comments at 3 and 6, and PE July 9 2010 Comments at 5.

³⁶ D.10-01-025 authorized PG&E to recover up to \$24.9 million in ratepayer funding to study the feasibility of a Compressed Air Energy Storage facility. Resolution 4355-E

Footnote continued on next page

currently investigating the economic and operational benefits associated with energy storage.³⁷ Until these investigative efforts provide the Commission with better information regarding storage technologies' commercial viability and benefits, we agree with SCE that "it is premature to foreclose other alternatives based on the current state of energy storage development."³⁸

Thus, we do not require storage in a separate scenario, nor order its inclusion across all portfolios.

3.1.3.3. Employment of Scenarios

Many parties requested clarity about the proposed use of the RPS scenarios in this proceeding. Specifically, all three IOUs, the Center for Energy Efficiency and Renewable Technologies (CEERT), GPI, the Large-Scale Solar Association and others requested that the Commission not use the scenarios to constrain or proscribe RPS procurement in any way. This Scoping Memo clarifies for parties the Commission's intended use of these scenarios.

Given the uncertainty in long term planning, it is prudent to use the best information available at the time to develop a plan. Using the best information available to both the Commission and the public, the Commission has selected 5

approved SCE's request to construct a battery demonstration facility at Tehachapi. D.09-08-027 also approved funding for permanent load shifting technologies.

³⁷ See CPUC Policy and Planning Division Staff White Paper, *Electric Energy Storage: An Assessment of Potential Barriers and Opportunities*, at: <http://www.cpuc.ca.gov/NR/rdonlyres/71859AF5-2D26-4262-BF52-62DE85C0E942/0/CPUCStorageWhitePaper7910.pdf>.

Also, AB 2514 was enacted on September 29, 2010, which requires the CPUC to initiate a proceeding to consider energy storage policies.

³⁸ SCE July 16th 2010 Comments at 3.

scenarios, representing various policy objectives. While certainly not exhaustive or definitive, the required scenarios represent a reasonable subset of possible renewable development outcomes for which the IOUs would have to build conforming renewable integration plans in this planning cycle.

RPS procurement authority is not an outcome of this proceeding, and any Commission decisions about RPS procurement would be considered in the appropriate RPS proceedings – R.06-02-012, R.08-08-009, or its successor. However, long-term renewable resource planning is within the scope of this proceeding. The RPS analysis presented in this Scoping Memo is the Commission’s first attempt at this long-term RPS planning, which also includes renewable integration. As parties are aware, the pattern of renewable generation development over the next ten years will be linked directly to when and where transmission gets built, to which areas of the state are determined to be appropriate for large generation installations, and to emerging information about renewable integration needs, as well as to commercial interest.

The plans submitted by the IOUs will provide this Commission with extremely valuable information about the extent to which the state’s residual net short or long, transmission, and integration needs vary in response to alternative forecasts of renewable development. If the need for new integration resources varies significantly across renewable generation scenarios – and the procurement authorizing resulting from the 2010 LTPP may thus accommodate one particular set or range of RPS resources but not another – then it would be appropriate to consider with parties the implications for RPS procurement. Any such implications could be addressed as appropriate in other proceedings at the Commission. Similarly, the scenarios utilized in this proceeding may be utilized

or modified in other proceedings as deemed appropriate by the ALJ or assigned Commissioner's office for the proceeding in question.³⁹

3.1.3.4. Specific Elements of Scenario Proposal

3.1.3.4.1. Discounted Core

While most parties agreed with the idea of holding a “discounted core” of resources constant across scenarios for RPS planning, several parties commented on the makeup of and criteria for inclusion in the discounted core. Division of Ratepayer Advocates (DRA), for example, suggests that all signed contracts should be included in the discounted core, while GPI, UCS and NRDC, FiT Coalition, and SCE suggest that the Commission apply some discount factor to all projects in addition to, or in place of, the deterministic approach proposed by Staff, which includes or excludes each individual project based on certain criteria.

No party provided justification for use of specific alternative discount factors for evaluation. Therefore, in the attached updated standardized assumptions (Attachment 2), the discounted core is essentially unchanged from the one provided to parties in the Staff proposed Planning Standards (Part II).

3.1.3.4.2. Photovoltaic Costs

Several parties recommended that the RPS analysis consider cost reductions for photovoltaic and, to a more limited extent, other technologies – either as a base case assumption or as a sensitivity. Given long-term trends and uncertainty regarding what portion of recent PV cost

³⁹ The scenarios utilized in this proceeding are also expected to be used by the CAISO in its transmission planning process, which may in turn result in applications for specific projects before this Commission.

declines can be attributed to changes in fundamentals, rather than to short-term shifts in supply and demand, we do not share the optimism of some parties regarding the extent to which PV prices may decline over the next 10 years.

We continue to find it most prudent to use current cost estimates for all technologies, but parties are welcome to test lower PV costs in the 33% RPS Calculator and to submit alternative scenarios as they believe warranted.

We note that cost does not affect resource selection for either the Environmentally-Constrained or the Time-Constrained scenario, and contributes only very slightly to resource selection in the Trajectory Scenario. Thus, a change in assumptions about the cost of PV would significantly affect the amount of PV in only 1 of the 4 required scenarios.

3.1.3.4.3. Timing Assumptions

In response to comments by several parties that the development timing assumptions in the RPS analysis were overly ambitious, we have revised some of the assumptions, as noted on the cover page to the updated standardized assumptions (Attachment 2). Staff also noted that the lack of obvious new, major transmission lines in most of the cases has a significant impact on the overall timing of the scenarios, and we anticipate revisiting the results of the timing analysis when the CAISO completes its high-level analysis of the transmission needs associated with each of the RPS scenarios.

Much of the work done by Staff in the June 2009 Implementation Analysis⁴⁰ to estimate the overall impact of “external risks” on the state’s ability

⁴⁰ <http://www.cpuc.ca.gov/NR/rdonlyres/1865C207-FEB5-43CF-99EB-A212B78467F6/0/33PercentRPSImplementationAnalysisInterimReport.pdf>.

to achieve a 33% RPS involved applying challenges and delays to transmission lines, technologies, and zones that were chosen relatively at random. This analysis was informative, as it attempted to illustrate whether a particular risk was likely to materialize as a delay *somewhere* in the state, with implications for the state's achievement of a 33% RPS.

However, applying such a methodology in the LTPP is more difficult – we know that certain risks are real, but zones and technologies should not be chosen at random for delay, given the potential real impacts for planning.

Here, we agree with parties including the California Wind Energy Association (CalWEA) and the Large-scale Solar Association (LSA) that a key goal of LTPP must be to identify major areas of uncertainty and risk, and to use that information to develop “robust long-term procurement principles designed to allow procurement and transmission planning to respond adroitly no matter how the uncertainties are resolved.”⁴¹

3.1.3.4.4. Environmental Scoring

The environmental scoring methodology proposed in an appendix to the RPS Ruling received a great deal of comment, though most parties agreed that environmental concerns could significantly affect renewable generation development over the LTPP's planning horizon and should thus be considered in long-term planning. We have performed several changes to the methodology in response to comments and these changes are reflected in the Standardized Planning Assumptions (Part 2 - Renewables).

Parties including LSA, CEERT and GPI expressed concern about the extent to which the proposed methodology diverged from, without improving upon,

the one developed by the Renewable Energy Transmission Initiative (RETI). In the revised standards, the new Disturbed Lands criterion remains, the High Desert and Air Quality criteria included in the draft have been removed, and RETI's measures of sensitive lands within and near a competitive renewable energy zone (CREZ) are now included.

Further, the technology-specific weightings proposed in the draft have also been removed, and are replaced by a calculation of acres/unit of energy/year that is specific to each technology and CREZ.⁴²

Comments by CEERT, GPI and LSA raised the issue of the need to evaluate a renewable resource's effect on overall system dispatch and emissions when considering the true environmental concern associated with any portfolio of renewable resources. We hope to address this issue, to some extent, through review of the integration needs associated with each scenario and the GHG emissions metric used to evaluate each plan.

3.1.3.4.5. Capacity Value

In response to party comments about the capacity valuation methodology employed in the RPS analysis, we agree with SCE and PG&E that consistency with the Commission-adopted net qualifying capacity methodology is warranted

⁴¹ LSA Comments, July 9 2010 at 4.

⁴² This approach mimics RETI's convention of "normalizing" each CREZ's score on each criterion by the total amount of energy in that CREZ, but accounts for the fact that the 33% RPS Calculator ranks projects individually and then sorts them into transmission "bundles" that may not reflect the overall resource mix of that CREZ. The energy metric that RETI used to normalize each CREZ's environmental score was specific to that CREZ's resource mix, so staff and its consultants developed an approach that maintained the intent of the RETI methodology, but reflected the appropriate new resource mix.

for the present analysis. However, we also understand the limitations of the reliance on capacity only as a methodology for long term planning as expressed by PG&E, LSA, CalWEA, Zephyr and Pacific Environment. We note, for example, that preliminary results from the work on renewables integration done by PG&E and CAISO raise questions about the capacity value of incremental resources as the “net” system peak shifts at very high levels of renewable penetration. This issue is not in scope in the current proceeding, but the Commission may address it in another proceeding, as appropriate.

3.1.3.4.6. Renewables Integration Modeling

The CAISO, with input from a working group of a number of stakeholders and PG&E are developing two independent models for addressing Renewables Integration in California for use in the LTPP proceeding. The CAISO and PG&E have presented methodologies and assumptions for a portion of the models in workshops held on August 24 and 25, 2010. Parties have commented on the information presented at those workshops. On October 22, 2010 PG&E presented the remainder of the model methodologies and assumptions, in addition to initial completed results, at a workshop. Parties are expected to comment on PG&E’s model shortly. At the same workshop, CAISO presented on its model methodologies and assumptions. An additional workshop is expected on the remainder of CAISO’s model during the last quarter of 2010. The renewables integration models are expected to be rerun with the planning assumptions detailed in this scoping memo with an initial release of information as detailed in the schedule. While the schedule details a release date for this information, we would encourage CAISO and PG&E to file results as they become available.

The results of these updated planning assumptions runs are expected to be presented according to the time line in the schedule. Parties will have had the opportunity to utilize the PG&E model, which is freely available, or any other model of their choice to develop other renewables scenarios for discussion at the February workshop as addressed below. Because of the extensive use of models in this proceeding, parties are reminded that access to computer models and related databases and documentation is required to be consistent with Rules 10.3 and 10.4 and Pub. Util. Code § 1822.

3.1.4. Planning Standards Part 3 – EE Assumptions

The third part of the Resource Planning Assumptions, related to EE, was issued in a ruling that mailed June 22, 2010 (EE Ruling). This ruling sought party inputs into EE inputs in two main areas: appropriate base case assumptions; and appropriate high and low sensitivity case assumptions.⁴³

Two specific questions were: (1) whether to deviate from the Commission's policy of using one hundred percent of Total Market Gross as the base case scenario; and (2) whether to deviate from the Commission's policies requiring utilities replace fifty percent of measure decay.⁴⁴

Most parties supported the Mid Case with variations. PG&E, SDG&E, TURN, NRDC, and DRA used the Mid Case as their recommendation for the starting value. By comparison, the Sierra Club of California (SCCA) supported using the High Case, and SCE the Low Case or the 2008 EE Goals. Reid

⁴³ EE Ruling at 4.

⁴⁴ *Id.* at 5.

indicated that the 2008 EE Goals should serve as the starting point, with changes to known variants such as the Title 20 and Title 24 Codes and Standards.

Parties are split on how much of the Big Bold Energy Efficiency Strategies (BBEES) savings to include in the analysis. The IOUs, recommended against including any savings from BBEES in the analysis. However, the IOUs already have programmatic designs in place for the 2010 - 2012 EE program cycle which will provide savings in this category.⁴⁵ In contrast, other parties⁴⁶ recommended using 100% of the BBEES savings.⁴⁷ Given the uncertainties raised by parties over BBEES in particular, we have decremented the savings attributed by BBEES by employing the low case values from the CEC's final Committee Report on Incremental Uncommitted Energy Efficiency (Incremental Uncommitted EE Report).⁴⁸

The CEC, in its final Committee Report on Incremental Uncommitted Energy Efficiency, recommended that the Commission adopt the EE savings decay for the committed period as a downward adjustment to the base Integrated Energy Policy Report (IEPR) forecast. The CEC conducted this additional analysis once it better understood the CPUC's policy on decay

⁴⁵ PG&E July 2nd Comments at 6-7; SCE July 2nd Comments at 11; and SDG&E July 2nd Comments at 13.

⁴⁶ DRA July 2nd Comments at 8-9; NRDC July 2nd Comments at 9; SCCA July 2nd Comments at 8; and TURN July 9th Comments at 2-3.

⁴⁷ Forecast peak savings attributable to BBEES, in the CEC's Incremental Uncommitted EE mid goals case in 2020, are 2,056 MW; Energy savings are 2,167 GWh.

⁴⁸ Forecast peak savings attributable to BBEES, in the CEC's Incremental Uncommitted EE low goals case in 2020 are 1,552 MW; Energy savings are 1,809 GWh.

replacement; however this analysis came after the adoption of the 2009 IEPR and thus was not included in the base forecast.

DRA, TURN, SCCA, NRDC, and Reid all support the inclusion of savings decay replacement, while the three IOUs oppose including savings decay replacement.

We have revised the Planning Standards (Part 3) and the resulting assumptions are contained in the Standardized Planning Assumptions (Part 1). For the common values, parties will use the Mid Case Incremental Uncommitted results, with the exception of the Low Case results for BBES. Additionally, the demand forecast will be further reduced by the inclusion of the CEC's recommended decrement for EE measure savings decay.

3.1.5. Alternative Scenarios Portfolios

Aside from the Commission required scenarios, parties are encouraged to file their own alternative scenarios and portfolios. We expect that all alternative scenarios and portfolios filed in this proceeding will conform to the Guiding Principles:

- A. Assumptions should take a realistic view of expected policy-driven resource achievements in order to ensure reliability of electric service and track progress toward resource policy goals.
- B. Assumptions should reflect the behavior of market participants, to the extent possible.⁴⁹
- C. Resource plans should be informed by an open and transparent process.⁵⁰

⁴⁹ A possible exception is confidential market price data, which may be reasonably substituted with public engineering- or market-based price data.

- D. Resource plans should consider whether substantial new investment in transmission and flexible resources would be needed to reliably integrate and deliver new resources to loads.
- E. Resource scenarios should provide useful information and resource portfolios should be substantially unique from each other.
- F. Filed plans should include “active” or “live” spreadsheets for the metrics and portfolio results.

To this end, we anticipate that parties will file documentation in a clear manner, including providing their own alternative load and resource tables, justification for changes from the standardized planning assumptions, and stating where they have left the common value assumptions unchanged. As stated earlier, we encourage use of the E3 calculator. To the extent that an alternative methodology is used, we expect that it will: explain why the E3 calculator is insufficient and present an equal depth of analysis. Alternative methodologies will be weighed individually on their own merit. Parties must explain any departures from the common value assumptions. Portfolio information must also conform to the “Portfolio Evaluation Criteria” established in the Standardized Planning Assumptions (Part 1). Alternative scenarios and portfolios will be filed concurrently with the scenarios detailed in this scoping memo run by the CAISO and PG&E, based on the schedule discussed herein.

⁵⁰ We believe that the renewable generation scenarios developed by Energy Division have been developed according to a transparent and vetted methodology. However, as stated in Guiding Principle B, there are benefits to having commercial activity reflected in renewable generation portfolios. These scenarios thus include some aggregated confidential information from the IOUs’ RPS solicitations. Access to disaggregated market data may be restricted to non-market participants who sign a non-disclosure agreement, pursuant to D.06-06-066 and its successors.

3.2. Track II – IOU Bundled Procurement Plans

The OIR noted that Track II will consider individual IOU procurement plans pursuant to § 454.5, in light of any guidance derived from Tracks I and III adopted no later December 31, 2010. The selection of a date certain for incorporation of Track III changes into Track II filings was reasonable when the range of possible action in Track III was broad. However, we delineate two distinct phases of Track III. The first phase is sufficiently limited in scope that we expect a date no later than the end of the year for Track III, Phase 1 issues to be incorporated in Track II. We expect no decision on Track III, Phase 2 issues prior to the filing of the Track II IOU bundled procurement plan. Each IOU shall file its individual bundled plan consistent with the schedule included in Section 5 below or as modified by the Track II Scoping Memo. Additional guidance will be provided in a subsequent Track II Scoping Memo. We anticipate that Track II will begin no later than January 2011.

In this track, we anticipate that the IOUs shall file their bundled plans and associated testimony, to be followed by intervenor testimony. Evidentiary hearings are anticipated, followed by a round of post-hearing briefs and reply briefs. Regardless of any modifications to the above schedule, we anticipate issuance of one or more proposed decisions on the IOU bundled plans no later than December 2011.⁵¹

Based on the record in R.08-02-007, we find it reasonable to direct the IOUs' filing of bundled LTPPs to be based on a limited set of standardized

⁵¹ The Commission is aware that the authorizations granted in D.07-12-052 only extend through 2016, and that the IOUs may need some decision on procurement authority by December 2011.

planning assumptions, consistent with those adopted here, using the best information available as described in the Track II Scoping Memo. While we envision that Track II plans will be based on currently effective conformed LTPP plans, our intent is to ensure that the IOUs' plans can be more easily compared to each other and to maintain consistency across utilities to the extent possible. Additional guidance will be provided by ALJ Rulings and/or by issuance of a revised Scoping Memo.

3.3. Track III – Procurement Rules

The OIR identified a number of issues that may be addressed in Track III, and noted that some must be resolved prior to the initiation of Track II of this proceeding.⁵² We prioritize several issues for resolution, including those issues that will be addressed in a second phase of Track III later in the proceeding, time permitting. We expect proposed decisions on the issues of Phase 1 of Track III by the end of the year and modify the schedule in the May 6, 2010 OIR with regard to the November 19, 2010 deadline as described above.

3.3.1. Phase 1

3.3.1.1. Updates to Procurement Rules to Comply with SB 695 and Refinements to the D.06-07-029 Cost Allocation Methodology

Senate Bill (SB) 695 (Stats. 2009, ch. 337, effective October 11, 2009) addresses many of the same issues addressed in the Cost Allocation Methodology (CAM) which we adopted in D.06-07-029. SB 695 applies to both Utility Owned Generation (UOG) and Independent Power Producer-owned

⁵² OIR at 14-17.

(IPP) generation, and provides that a cost allocation must be “on a fully nonbypassable basis consistent with departing load provisions as determined by the Commission.”⁵³

Thus, this proceeding will consider any necessary modifications to the CAM-related rules needed to implement SB 695 and also address refinements to the CAM process. Modifications to CAM-related rules to ensure statutory compliance do not raise disputed issues of fact, and will be resolved by concurrent briefs and reply briefs, as detailed in an ALJ Ruling issued September 14, 2010. CAM issues that are broader than those related to SB 695 are expected to be addressed in the 2nd phase of Track III.

3.3.1.2. CAISO Corporation Market-Related Procurement Implementation Issues

The CAISO instituted a new market structure in 2009, previously known as the Market Redesign and Technology Upgrade. This proceeding will consider LTPP issues that arise from the new CAISO market design, with a particular focus on the upfront standard for IOU procurement activity in congestion revenue rights (CRR) and convergence bidding markets.

Due to the complexity of the issues involved and the need to reach a resolution this year, ALJ Kolakowski issued a ruling (First Convergence Bidding Ruling) on July 1, 2010 regarding IOU participation in the CAISO’s planned convergence bidding market. The First Convergence Bidding Ruling set forth a schedule for IOU proposals, comments and reply comments, and workshops. The First Convergence Bidding Ruling also asked a series of questions directed to parties’ analysis of the risks and benefits of IOU participation in the CAISO

⁵³ Section 365.1(c)(2)(A).

convergence bidding market, as well as any potential limitations on that participation.

In response to a July 9, 2010 motion from PG&E, DRA and TURN, ALJ Kolakowski issued a Second Convergence Bidding Ruling on July 16, 2010, modifying the schedule.

Parties have provided comments and reply comments related to the questions from the First Convergence Bidding Ruling, and PG&E, SCE, and SDG&E have filed their individual proposals for participation. An additional round of comments concluded by September 7, 2010. These issues were included in a Proposed Decision which issued on November 15, 2010.

Issues regarding CRR procurement activities and any other CAISO market related issues shall be considered in the 2nd phase of Track III of this proceeding if conditions merit it.

3.3.2. Phase 2

3.3.2.1. Procurement Rules to Comply with OTC Policies

This proceeding will consider a number of procurement policies related to IOU-owned or contracted OTC generation units.⁵⁴ Examples of such policies include, but are not limited to, policies encouraging retirement of OTC units; Request for Offer (RFO) design to procure new greenfield or repowered projects for local RA, while minimizing market power; and RFO bid evaluation protocols

⁵⁴ We anticipate that changes to procurement rules may be necessary to ensure that IOU procurement activity is in accordance with any adopted OTC policy.

to allow comparison of retrofitting projects.⁵⁵ To the extent possible, these issues shall be resolved as part of the 2nd phase of Track III, as informed by the concurrent development of Track I.

3.3.2.2. Clarification / Refinement of Existing Procurement-Related Requirements in Support of the Development of a Procurement Requirements Summary Document (a.k.a. “Rulebook”)

A Staff draft of a procedural requirements summary document or “Rulebook” was attached to a June 2, 2010 ruling (Rulebook Ruling) by ALJ Kolakowski. While this document is known informally as the “Rulebook,” its final implementation may be in one of several different forms. A workshop was held on the Rulebook on June 11, 2010, and comments and reply comments were filed by parties.

One of the key issues discussed by the parties in comments was whether the Rulebook would serve as a compendium of existing rules and policies, or whether it would replace prior Commission action and serve as a single comprehensive governing document, much like a General Order. Other than SCE, all commenting parties favored treating this document as a compendium. This issue will be addressed in the 2nd phase of Track III.

⁵⁵ Retrofitting refers to a modification of an existing plant through the installation of a cooling system that complies with an adopted OTC policy. Retrofitting projects do not add new capacity to the system.

3.3.2.3. Refinements to Bid Evaluation in Competitive Solicitations (particularly with respect to UOG Bids)

D.07-12-052 identified several concerns related to the process for evaluating UOG bids against Power Purchase Agreements bids. These concerns focus on the need to ensure that the bid evaluation process is fair, just and reasonable, and include the need to determine whether and how bid criteria can be developed to improve head-to-head comparisons of UOG and IPP bids.

Issues which may be considered include:

- How IOU bid development costs would be addressed (“at-risk” or ratepayer-guaranteed);
- The extent to which penalty and reward components are or should be added to UOG bids to make them consistent with IPP bids;
- What measures should be taken to prevent sharing of sensitive information between utility staff involved in developing utility bids and staff who create bid evaluation criteria and that select the winning bids;
- How failed contracts should be handled within the IOU RFO/procurement process; and
- Whether parties might agree on a common set of risk factors better managed by IOUs as compared to IPPs, to simplify the standard terms and conditions in the IOUs’ pro forma contracts and subsequent counterparty contract negotiations.

As with the broader range of SB 695 issues, these issues may benefit from the developments of Track I and shall be considered later in Phase 2 of Track III.

3.3.2.4. GHG Compliance Products and Risk Management Strategies

This proceeding will also consider the GHG compliance products that IOUs will be authorized to procure to meet their anticipated California GHG

compliance obligations. Included in this authorization will be the GHG risk management approaches the IOUs plan to employ to manage this new risk.⁵⁶ Due to the timing of the ARB's schedule for announcing the details of their proposed GHG regulations, this issue shall be addressed later in the proceeding after an ALJ ruling setting a process and schedule for review.

**3.3.2.5. Refinements to the Timelines
Associated with IOU RFOs for RA
Products**

D.06-06-064 instructs the IOUs to develop "least cost/best fit" portfolios and to sell contracted resources that are not needed. To meet this obligation, IOUs need to provide the excess resources to the market with sufficient time that other LSEs have an opportunity to purchase them to meet their resource obligations. We shall evaluate potential schedule milestones that IOUs can adopt to allow for smoother LSE compliance with RA filing deadlines.

3.3.2.6. Other Procurement Rule Changes

Staff has identified several issues in the Quarterly Compliance Report approval process: (1) net debtor IOU transactions with non-investment grade counterparties and collateral requirements; (2) refinements to Independent Evaluator (IE) guidelines (e.g., restrictions on IEs engaging in other business with the utility while being an IE); (3) clarifications related to the timing and availability of public information related to the Procurement Review Groups;

⁵⁶ The Commission may also authorize in Track III interim IOU authority to procure a limited amount of these products, since the adoption of final ARB Cap and Trade Program regulations is anticipated in advance of the Track II decision in which bundled procurement authority will be addressed.

and (4) acceptable timeframes for IOU procurement staff to sign their codes of conduct.

These issues shall be addressed in the 2nd phase of Track III in this proceeding.

4. Evidentiary Hearings

Evidentiary hearings are anticipated in Track I. Evidentiary hearings may be held in Track II of this proceeding on appropriate issues (if necessary), to be set forth in subsequent rulings by the assigned Commissioner or ALJ.

5. Schedule

Track I

Date	Item
November 30, 2010	Workshop on step 2 results for CAISO model (a separate ruling will set dates for workshop comments.)
March 11, 2011	PG&E files renewables integration (RI) results for all runs, CAISO files RI results for runs completed to date ⁵⁷
March 18, 2011	Parties file alternative scenarios, metrics and common values; IOUs also file required scenarios and metrics
Late March 2011	Workshops presenting completed scenarios and outputs from updated RI runs
April 1, 2011	Requests for hearings due
April 8, 2011	Comments due on RI results
April 15, 2011	Reply comments due on RI results

⁵⁷ To the extent individual runs are available before a particular due date, results should be distributed to all parties.

April 22, 2011	Comments due on data adequacy of required and alternative scenarios and metrics filed by parties
April 29, 2011	Reply comments due on data adequacy of required and alternative scenarios and metrics filed by parties
May 2011	Ruling on data sufficiency of filings
May 31, 2011	Supplemental data filings on scenarios and metrics (if necessary)
June 2011	Filed Testimony
July 2011	Hearings (if necessary)
July 15, 2011	Comments due on possible Commission actions
July 22 2011	Reply comments due on possible Commission actions
August 2011	Briefs and Reply Briefs
November 2011	Track I proposed decision

Track II

Date	Item
January 14, 2011	Utilities file bundled procurement authority plan and supporting testimony
February 18, 2011	Non-IOU Party testimony
March 18, 2011	Reply testimony
March 31, 2011	Request for hearings due
April 2011	Hearings (if necessary) or workshops
May - June 2011	Opening briefs on bundled procurement authority plan
May - June 2011	Reply briefs on bundled procurement authority plan

September 2011	Track II proposed decision
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Date	Item
Spring 2011	Scoping, workshops (if necessary) and briefing of Phase 2 of Track III issues
Fall 2011	Track III, Phase 2 proposed decision

6. Attachments

We direct the use of the attached Standardized Planning Assumptions documents, Attachment 1 - Standardized Planning Assumptions (Part 1) for System Resource Plans, Attachment 2 - Standardized Planning Assumptions (Part 2 - Renewables) for System Resource Plans. The original Staff proposed Planning Standards have been updated based on party comments and the workshops held on June 2010 on the 11th, 18th, and 25th and are now replaced with this Scoping Memo’s Standard Planning Assumptions.

7. Discovery

A party of which a discovery request has been made shall provide a complete response within 10 working days of each request. If the responding party needs clarification of the request, it shall seek that clarification within two working days of receiving the request. If the responding party cannot provide a complete response within 10 working days, it shall communicate that fact to the requesting party within four working days, along with providing a firm date for a complete response. A party issuing a discovery request shall simultaneously provide a copy of that request to all other parties. A responding party shall provide a copy of its discovery response to each party that makes a request for that specific response. Electronic copies of discovery requests and discovery responses are sufficient unless the receiving party requests a paper copy.

Parties shall undertake a “meet and confer” process in a good faith effort to resolve any discovery dispute. The meeting may occur telephonically if that is more convenient than an in-person meeting. If that attempt does not resolve the dispute, the parties shall so inform the ALJ. If there is not a timely opportunity to use that forum, the disputing parties may send an e-mail to the ALJ regarding the dispute. The assigned ALJ may schedule a conference call, ask for written motions, refer the discovery dispute to the Law and Motion ALJs, or take other steps as deemed appropriate. The assigned ALJ’s e-mail address is vsk@cpuc.ca.gov.

8. Filing, Service, and Service List

All formally filed documents in this proceeding must be filed with the Commission’s Docket Office and served on the service list for the proceeding. Article 1 of the Rules contains all of the Commission’s filing requirements. Parties are encouraged to file electronically whenever possible as it speeds processing of the filings and allows them to be posted on the Commission’s website. More information about electronic filing is available in Rule 1.13 and at <http://www.cpuc.ca.gov/PUC/efiling>. We will follow the electronic service protocols adopted by the Commission in Rule 1.10 of the Commission’s Rules of Practice and Procedure for all documents, whether formally filed or just served. This Rule provides for electronic service of documents, in a searchable format, unless the appearance or state service list member did not provide an e-mail address. If no e-mail address was provided, service should be made by United States mail. In this proceeding, we require concurrent e-mail service to ALL persons on the service list for whom an e-mail address is available, including those listed under “Information Only.” Parties are expected to provide paper copies of served documents upon request.

E-mail communication about this case should include, at a minimum, the following information on the subject line of the e-mail: R.10-05-006-2010 LTPP. In addition, the party sending the e-mail should briefly describe the attached communication; for example, *Brief*. Paper format copies, in addition to electronic copies, shall be served on the assigned Commissioner and the ALJ.

The official service list for this proceeding is available on the Commission's web page. Parties should confirm that their information on the service list is correct, and serve notice of any errors on the Commission's Process Office, the service list, and the ALJ. Prior to serving any document, each party must ensure that it is using the most up-to-date service list. The list on the Commission's web site meets that definition.

Any person interested in participating in this proceeding who is unfamiliar with the Commission's procedures or who has questions about the electronic filing procedures should contact the Commission's Public Advisor at (866) 849-8390 or in San Francisco at (415) 703-2074, or (866) 836-7825 (TTY-toll free), or send an e-mail to public.advisor@cpuc.ca.gov.

9. Intervenor Compensation

The prehearing conference in this matter was held June 12, 2010. Pursuant to § 1804(a)(1), a customer who intended to seek an award of compensation but has not done so already should have already filed and served a notice of intent (NOI) to claim compensation. In one or more separate ruling(s), the ALJ will address eligibility to claim compensation for the pending NOIs.

10. Categorization, Need for Hearings, *Ex Parte* Rules, and Designation of Presiding Officer

The Commission preliminarily categorized this proceeding as "ratesetting" as defined in Rule 1.3(e) and determined that the matter should be

set for hearing. No party has disputed the Commission's preliminary categorization of this proceeding as "ratesetting." We affirm that preliminary determination. This ruling, as to category, is appealable pursuant to Rule 7.6.

In a ratesetting proceeding, Rule 13.2 defines the presiding officer as the person designated as such by the assigned Commissioner prior to the first hearing in the proceeding. The assigned Commissioner has designated ALJ Victoria S. Kolakowski and ALJ Peter V. Allen as the presiding officers. The provisions of § 1701.3(a) apply. The applicable *ex parte* rules are set forth in Rule 8.2(c).

IT IS RULED that:

1. This ruling confirms the Commission's preliminary finding that the category for this proceeding is ratesetting, and finds that hearings will be necessary. This ruling, only as to category, is appealable under Rule 7.6.
2. Administrative Law Judge (ALJ) Victoria S. Kolakowski and ALJ Peter V. Allen are the presiding officers for this proceeding.
3. The scope of this proceeding is as set forth in Section 3 of this ruling.
4. The schedule for this proceeding is as set forth in Section 5 of this ruling.
5. The assigned ALJ may make any revisions or provide further direction regarding the scope of this proceeding and the manner in which issues shall be addressed, as necessary for a full and complete development of the record.
6. The ALJ may modify the schedule adopted herein as necessary for the reasonable and efficient conduct of this proceeding.

7. Parties shall serve all filings as set forth in Section 8 of this ruling.

Dated December 3, 2010, at San Francisco, California.

/s/ MICHAEL R. PEEVEY

Michael R. Peevey
Assigned Commissioner

/s/ JANET A. ECONOME for

Victoria S. Kolakowski
Administrative Law Judge

/s/ JANET A. ECONOME for

Peter V. Allen
Administrative Law Judge

INFORMATION REGARDING SERVICE

I have provided notification of filing to the electronic mail addresses on the attached service list.

Upon confirmation of this document's acceptance for filing, I will cause a Notice of Availability of the filed document to be served upon the service list to this proceeding by U.S. mail. The service list I will use to serve the Notice of Availability of the filed document is current as of today's date.

Dated December 3, 2010, at San Francisco, California.

/s/ OYIN MILON
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N O T I C E

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address to ensure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

The Commission's policy is to schedule hearings (meetings, workshops, etc.) in locations that are accessible to people with disabilities. To verify that a particular location is accessible, call: Calendar Clerk (415) 703-1203.

If specialized accommodations for the disabled are needed, e.g., sign language interpreters, those making the arrangements must call the Public Advisor at (415) 703-2074 or TDD# (415) 703-2032 five working days in advance of the event.

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